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MEMORANDUM

DATE: August 26, 2026

TO: Interagency Consultation Review Group

FROM: Brian Lasagna, Regional Analyst

SUBJECT: ICR Review of BCAG's Draft 2027 FTIP Air Quality Emissions Analysis and Conformity Determination

DISCUSSION: The purpose of this memo is to provide the ICR with the opportunity to comment on BCAG's Draft 2027 Federal Transportation Improvement Program (FTIP) Air Quality Emissions Analysis and Conformity Determination in accordance with the BCAG public participation plan and the federal consultation requirements of 40 CFR 93.105.

Butte County is designated marginal non-attainment under the 2008 federal 8-hour ozone National Ambient Air Quality Standards (NAAQS). Further, Butte County was designated marginal non-attainment under the federal 2015 8-hour ozone NAAQS. Because of these designations, the Butte County Association of Governments (BCAG) is required to perform an air quality conformity determination for the 2027 FTIP.

REQUESTED ACTION

The ICR is being provided with the opportunity to comment on BCAG's Draft 2027 FTIP Air Quality Emissions Analysis and Conformity Determination and to concur with BCAG's use of the latest planning assumptions as required under 40 CFR 93.110. In addition, the ICR is being asked to concur with changes to four (4) existing projects carried over from the 2025 FTIP.

Latest Planning Assumptions

Planning assumptions have been carried over from the 2024 RTP emissions analysis with changes to account for the latest off-model adjustments approved by US EPA, as described below.

BCAG used the most current federally approved emissions model to prepare the regional emissions analysis. At the time this document was updated for the 2027 FTIP, July 2026, EMFAC 2021 was the latest federally approved model in California. In addition, two off-model adjustments were included to: 1) remove the estimated emissions benefits attributed to California's Advanced Clean Trucks (ACT), Zero-Emission Airport Shuttle, Heavy-Duty Vehicle and Engine Emission Warranty and Maintenance Provisions (Warranty Phase 1), and Heavy-Duty Omnibus (Omnibus) regulations from EMFAC2021, as approved by US EPA on November 21, 2025, and; 2)

account for California's Heavy-Duty Vehicle Inspection and Maintenance Program (HD I/M Program), as approved by the US EPA on February 6, 2026.

The latest planning assumptions have been summarized and are included in **Attachment #1**.

Changes to Existing Exempt Carry-Over Projects

The following projects have been carried over from the 2025 FTIP with changes to either project title, description, and/or exemption reference.

City of Oroville – Washington Ave. and Table Mountain Complete Streets Project. Project scope has been expanded to include roundabouts. This change includes an update to the exemption reference. The project is exempt from a regional emissions analysis per the Environmental Protection Agency's Transportation Conformity Rule Section 93.127, Table 3. Projects Exempt from Regional Emissions Analysis, indicating that intersection channelization projects are exempt.

Town of Paradise – Go Paradise: Pentz Student Pathway. Project title changed for consistency with Town's bike and pedestrian improvement program.

Town of Paradise – Roe Road Extension Pentz to South Libby – Phase 1 Class II Bike Lanes. Project title and description changed to reflect change in scope from Class I to Class II bike lanes.

Town of Paradise – South Libby to SR 191 / Clark Rd – Phase 2 Class II Bike Lanes. Project title and description changed to reflect change in scope from Class I to Class II bike lanes.

A complete listing of exempt and non-exempt projects has been included in Appendix A and Appendix B of the Draft 2027 FTIP Air Quality Emissions Analysis and Conformity Determination.

New Regional Emissions Analysis

The 2027 FTIP includes no new non-exempt projects. However, new off-model emissions adjustments were approved by US EPA for EMFAC 2021, therefore, a new regional emission analysis and conformity determination are required.

For the proposed action, BCAG states for the record:

1. Non-Exempt Projects: No new non-exempt projects are included in the 2027 FTIP.
2. TCM Implementation: There are no Transportation Control Measures in the approved Carbon Monoxide (CO) SIP and there is no approved Ozone or PM_{2.5} SIP applicable to Butte County. Because there are no TCMs in an approved SIP for Butte County, Butte County currently has no TCMs in place and therefore timely TCM implementation requirements do not apply.
3. Financial Constraint: The 2024 RTP and 2027 FTIP has been financially constrained in accordance with the requirements of 40 CFR 93.108 and consistent with the U.S. DOT metropolitan planning regulations (23 CFR Part 450).

4. Interagency and Public Consultation: The following portion applies after all consultation is complete - *for the 2027 FTIP, BCAG initially consulted on this amendment with its Interagency Consultation Review (ICR) group on August 26, 2026. BCAG staff provided a 30-day public review and comment period in compliance with BCAG's adopted Public Participation Plan (PPP). On August 12, 2026, legal notices were posted on the BCAG website. The proposed amendment has been circulated among staff from Federal Highway Administration (FHWA), Environmental Protection Agency (EPA), Federal Transit Agency (FTA), and Caltrans. Appendices contain copies of public notices and responses to public comments.*

ADDITIONAL INFORMATION

2027 FTIP Regional Emissions Analysis

Included for the ICRs information is a copy of the Draft 2027 FTIP Regional Emissions Analysis which includes the listing of all federal and regionally significant projects expected to occur in the non-attainment areas of the BCAG region which have been included in the regional emissions analysis for the 2027 FTIP and 2024 RTP.

Schedule

Included below is the schedule of activities for completing the 2027 FTIP regional emissions analysis and conformity determination.

August 12, 2026,	Release Draft 2027 FTIP for 30-day public comment period and hold Public Workshop
August 26, 2026,	BCAG Interagency Consultation Review (15-day period)
September 11, 2026,	30-day public review period concludes
September 24, 2026,	BCAG Board of Directors considers adoption.

STAFF REQUEST: BCAG staff requests the ICR review and provide comments regarding BCAG's proposed action. In addition, BCAG staff requests that EPA and Caltrans concur with BCAG's proposed action.

ATTACHEMNT #1

Summary of Latest Planning Assumptions for the BCAG Conformity Analysis 40 CFR 93.110

Assumption	Year and Source of Data (MPO Action)	Modeling	Next Scheduled Update
Population	Base Year: 2022 CA DOF Projections: based on BCAG's <i>Butte County Long-Term Regional Growth Forecasts 2022-2045</i> , prepared March 2023. Modeling utilizes "medium scenario" included in the plan.	Included in developing latest BCAG regional transportation model and land use allocations for the years 2025, 2035, and 2045.	Next update to population forecasts is anticipated to be adopted December 2028.
Employment	Base Year: 2022 CA EDD Projections: based on BCAG's <i>Butte County Long-Term Regional Growth Forecasts 2022-2045</i> , prepared March 2023. Modeling utilizes "medium scenario" included in the plan.	Included in developing latest BCAG regional transportation model and land use allocations for the years 2025, 2035, and 2045.	Next update to employment forecasts is anticipated to be adopted December 2028.
Traffic Counts	Base Year: 2022 The transportation model was validated to the base year using year 2022 traffic counts collected by Caltrans, local jurisdictions, and BCAG.	Latest BCAG regional transportation model was validated using counts.	Traffic counts are updated every 4 years, depending upon availability of funding.
Vehicle Miles of Travel	The transportation model was validated in 2024 to the 2022 base year.	Cube is the model used to estimate VMT for the BCAG regional transportation model.	VMT is an output of the transportation model; VMT is affected by the RTP/FTIP project updates and is included in each new emissions analysis.
Speeds	The transportation model uses industry-standard volume delay curves. Baseline speeds are set according to posted and surveyed speeds and the speeds are sensitive to the amount of traffic on the roadway segments.	Cube and EMFAC 2021 (v1.0.2)	Speed data is updated every 4 years, dependent upon availability of funding.
Vehicle Registration	EMFAC 2021 was the most recent federally approved model for use in California conformity analysis when the 2024 RTP was developed. Vehicle registration is included by ARB in the model and cannot be updated by the user.	EMFAC 2021 (v1.0.2) with November 21, 2025, adjustment factors and HD I/M Regulation adjustment factors (2/6/2026).	EMFAC 2021 will be used for any analysis on or after November 15, 2024
Transit	Base Year: Butte Regional Transit (2022) and Butte County Transit and Non-Motorized Plan (2022) Projections: Butte County Transit and Non-Motorized Plan (2022).	Cube	TBD