

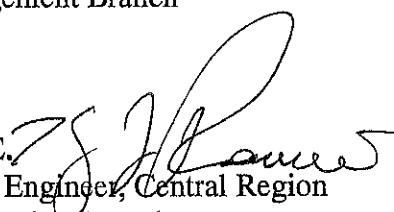
Memorandum

*Serious drought.
Help save water!*

To: DAVID GOULD
Environmental Planner
Southern San Joaquin Valley Cultural Resources Branch
Environmental Management Branch

Date: November 12, 2019

File: 06-0V110
0616000208
KIN-41
PM30.6/33.0

From: KEN ROMERO, P.E. 
Senior Transportation Engineer, Central Region
Environmental Engineering Branch

**Subject: AIR QUALITY MEMO FOR THE STRATFORD KINGS RIVER BRIDGE
REPLACEMENT PROJECT**

Project Description

The California Department of Transportation proposes to demolish and construct a new replacement bridge at the existing bridge location at Post Mile (PM) 32.3 on State Route (SR) 41 in Kings County, California.

The project is exempt under 40 CFR 93.126 Table 2, "Reconstructing bridges (no additional travel lanes).

However, the project will complete cut access to through-traffic along SR-41 in the project area. As SR-41 serves as the main access road to the Central Coast for goods movement as well as a majority of Central Valley motorists, a detour has been proposed.

Due the closure of the only direct route to the Coast from the Central Valley, project duration, and length of the proposed detour, the project's detour was presented to the Interagency Consultation Partners and ask that for concurrence that the project's detour is not a "Project of Air Quality Concern". Caltrans (acting NEPA agency) and the US EPA concurred on October 29, 2019.

Detour Description:

The detour distance will be 32.5 miles, and consists of the following segments:

- SB SR-41 traffic will be detoured onto WB SR-198 and continue to Avenal Cutoff road. The distance is 3.9 miles
- Avenal Cutoff road continues southwest towards I-5. Traffic wishing to access I-5 will take the NB diverge towards the left bound traffic will use the northbound diverge to merge onto SR-269, then access the onramps for I-5. The distance is 18.6 miles

- Motorists will continue southwards on the I-5 until the I-5/SR-41 junction. The distance is 10 miles
- Temporary signal lights will be placed at locations yet to be determined
 - Alternative 1: Route 269/Avenal Cutoff Rd and Route 269/I-5 NB ramps
 - Alternative 2: Route 269/I5 SB ramps and Route 269/I-5 NB ramps

Purpose and Need

The project's purpose and need is to replace the outdated bridge.

The project is needed to reduce every-increasing maintenance costs and worker's exposure to unsafe conditions, as well as provide Complete Street features to increase safety and accessibility for pedestrians and bicyclists.

Transportation Conformity

The Federal Clean Air Act requires that all transportation plans and programs pass the air quality conformity test. This process involves forecasting future vehicle emissions of air pollutants to determine whether the amount of future vehicle poll resulting from the plan or program would be within the allowable limit for motor vehicle emissions.

Kings County is in non-attainment status for the Federal 8-hour Ozone and Particulate Matter (PM) 2.5 standards and in attainment for the Federal Particulate Matter (PM) 10 standards. Kings County is in non-attainment status for the State Ozone, PM10, and PM 2.5 standards.

The Stratford Kings River Bridge Replacement project is exempt from conformity under Table 2 of 40 CFR § 93.126 – "Reconstructing bridges (no additional travel lanes)."

The detour was presented to the Interagency Consultation Partners and was found to be not a "Project of Air Quality Concern". Concurrence from Caltrans and EPA was received on October 29, 2019.

This project is not expected to cause any operational effects on air pollutants.

Construction emissions for the detour were estimated. The project will generate 477 tons of CO₂ over a period of 200 working days.

Please contact Maya Hildebrand at (559) 445-6426 if you have questions concerning this memo.

Transportation Air Quality Conformity Findings Checklist

| | | | |
|-------------------------|---|--|--|
| Project Name: | Stratford Kings River Bridge Replacement Project | | |
| Dist-Co-Rte-PM: | 06-KIN-41-PM-32.3 | EA: | 06-0V110 |
| Federal-Aid No.: | | | |
| Document Type: | <input checked="" type="checkbox"/> 23 USC 326 CE | <input type="checkbox"/> 23 USC 327 CE | <input type="checkbox"/> EA <input type="checkbox"/> EIS |

Step 1. Is the project located in a nonattainment or maintenance area for ozone, nitrogen dioxide, carbon monoxide (CO), PM2.5, or PM10 per EPA's Green Book listing of non-attainment areas?

If no, go to Step 17. **Transportation conformity does not apply to the project.**

If yes, go to Step 2.

Step 2. Is the project exempt from conformity per 40 CFR 93.126 or 40 CFR 93.128

If yes, go to Step 17. **The project is exempt from all project-level conformity requirements (40 CFR 93.126 or 128) (check one box below and identify the project type, if applicable).**

40 CFR 93.126 Project type: Reconstructing bridges; no additional travel lanes

40 CFR 93.128

If no, go to Step 3.

Step 3. Is the project exempt from regional conformity per 40 CFR 93.127

If yes, go to Step 8. **The project is exempt from regional conformity requirements (40 CFR 93.127) (identify the project type). Project type:**

If no, go to Step 4.

Step 4. Is the project located in a region with a currently conforming RTP and TIP?

If yes, **the project is included in a currently conforming RTP and TIP per 40 CFR 93.115. The project's design and scope have not changed significantly from what was assumed in RTP conformity analysis (40 CFR 93.115[b])** Go to Step 8.

If no and the project is located in an isolated rural area, go to Step 5.

If no and the project is not located in an isolated rural area, STOP and do not proceed until a conforming RTP and TIP are adopted.

Step 5. For isolated rural areas, is the project regionally significant per 40 CFR 93.101, based on review by Interagency Consultation?

If yes, go to Step 6.

If no, go to Step 8. **The project, located in an isolated rural area, is not regionally significant and does not require a regional emissions analysis (40 CFR 93.101 and 93.109[1]).**

Step 6. Is the project included in another regional conformity analysis that meets the isolated rural area analysis requirements per 40 CFR 93.109, including Interagency Consultation and public involvement?

If yes, go to Step 8. **The project, located in an isolated rural area, has met its regional analysis requirements through inclusion in a previously-approved regional conformity analysis that meets current requirements (40 CFR 93.109[1]).**

If no, go to Step 7.

Step 7. The project, located in an isolated rural area, requires a separate regional emissions analysis.

Regional emissions analysis for regionally significant project, located in an isolated rural area, is complete. Regional conformity analysis was conducted that includes the project and reasonably foreseeable regionally significant projects for at least 20 years. Interagency Consultation and public participation were conducted. Based on the analysis, the interim or emission budget conformity tests applicable to the area are met (40 CFR 93.109[1] and 95.105).¹ Go to Step 8.

Step 8. Is the project located in a CO nonattainment or maintenance area?

If no, go to Step 9. **CO conformity analysis is not required.**

If yes, **hot-spot analysis requirements for CO per the CO Protocol (or per EPA's modeling guidance, CAL3QHCR can be used with EMFAC emission factors²) have been met. Project will not cause or contribute to a new localized CO violation (40 CFR 93.116 and 93.123)³. Go to Step 9.**

Step 9. Is the project located in a PM10 and/or a PM2.5 nonattainment or maintenance area?

If no, go to Step 13. **PM2.5/PM10 conformity analysis is not required.**

If yes, go to Step 10.

¹ The analysis must support this conclusion before going to the next step.

² Use of the CO Protocol is strongly recommended due to its use of screening methods to minimize the need for modeling. When modeling is needed, the Protocol simplifies the modeling approach. Use of CAL3QHCR must follow U.S. EPA's latest CO hot spot guidance, using EMFAC instead of MOVES; see: <http://www.epa.gov/otaq/stateresources/transconf/projectlevel-hotspot.htm#co-hotspot>.

³ As of October 1, 2007, there are no CO nonattainment areas in California. Therefore, the requirements to not worsen existing violations and to reduce/eliminate existing violations do not apply.

Step 10. Is the project considered to be a Project of Air Quality Concern (POAQC), as described in EPA's Transportation Conformity Guidance for PM 10 and PM 2.5?

- If no, **the project is not a project of concern for PM10 and/or PM2.5 hot-spot analysis based on 40 CFR 93.116 and 93.123 and EPA's Hot-Spot Analysis Guidance. Interagency Consultation concurred with this determination on [redacted]. Go to Step 12.**
- If yes, go to Step 11.

Step 11. The project is a POAQC.

- The project is a project of concern for PM10 and/or PM2.5 hot-spot analysis based on 40 CFR 93.116 and 93.123, and EPA's Hot-Spot Guidance. Interagency Consultation concurred with this determination on [redacted]. Detailed PM hot-spot analysis, consistent with 40 CFR 93.116 and 93.123 and EPA's Hot-Spot Guidance, shows that the project would not cause or contribute to, or worsen, any new localized violation of PM10 and/or PM2.5 standards. Go to Step 12.**

Step 12. Does the approved PM SIP include any PM10 and/or PM2.5 control measures that apply to the project, and has a written commitment been made as part of the air quality analysis to implement the identified SIP control measures? [Control measures can be found in the applicable Federal Register notice at: <https://www.epa.gov/state-and-local-transportation/conformity-adequacy-review-region-9#ca>]

- If yes, **a written commitment is made to implement the identified SIP control measures for PM10 and/or PM2.5 through construction or operation of this project (40 CFR 93.117).** Go to Step 14.
- If no, go to Step 13.

Step 13a. Have project-level mitigation or control measures for CO, PM10, and/or PM2.5, included as part of the project's design concept and scope, been identified as a condition of the RTP or TIP conformity determination? AND/OR

Step 13b. Are project-level mitigation or control measures for CO, PM10, and/or PM2.5 included in the project's NEPA document?

AND

Step 13c (applies only if Step 13a and/or 13b are answered "yes"). Has a written commitment been made as part of the air quality analysis to implement the identified measures?

- If yes to 13a and/or 13b and 13c, **a written commitment is made to implement the identified mitigation or control measures for CO, PM10, and/or PM2.5 through construction or operation of this project. These mitigation or control measures are identified in the project's NEPA document and/or as conditions of the RTP or TIP conformity determination¹ (40 CFR 93.125(a)).** Go to Step 14.
- If no, go to Step 14

Step 14. Does the project qualify for a 771.117(c)(22), (c)(23), (c)(26), (c)(27), or (c)(28)⁴ Categorical Exclusion pursuant to 23 USC 326 and is an Air Quality Conformity Analysis required to document any analysis required by Steps 1 through 13 of this form?⁵

- If yes, then Caltrans prepares the Air Quality Conformity Analysis and makes the conformity determination. No FHWA involvement is required. See the AQCA Annotated Outline. Go to Step 17.
- If no, go to Step 15.

Step 15. Does the project qualify for any Categorical Exclusion pursuant to 23 USC 326 (including 771.117(c)(22), (c)(23), (c)(26), (c)(27), or (c)(28) when NO Air Quality Conformity Analysis is required)?

- If yes, then no FHWA involvement is required and Caltrans makes the conformity determination through its signature on the CE form. **An Air Quality Conformity Analysis (AQCA) is not needed.** Go to Step 17.
- If no, go to Step 16.


Step 16. Does the project require preparation of a Categorical Exclusion, EA, or EIS pursuant to 23 USC 327?

- If yes, then Caltrans submits a conformity determination to FHWA for FHWA's conformity determination. **An AQCA is needed.** See the AQCA Annotated Outline.

Date of FHWA air quality conformity determination: [redacted]

Go to Step 17.

Step 17. STOP as all air quality conformity requirements have been met.

Signature: 

Printed Name: Maya Hildebrand

Title: Air Quality Coordinator

Date: 11/19/2019

⁴ Please note that certain activities covered by these categorical exclusions may require that Caltrans prepare an Air Quality Conformity Analysis rather than documenting the conformity determination with the Senior Environmental Planner's signature on the Categorical Exclusion form.

⁵ Please note that for ALL projects the project file must include evidence that one of the three following situation applies: 1) Conformity does not apply to the project area; or 2) The project is exempt from all conformity analysis requirements; or 3) The project is subject to project-level conformity analysis (and possibly regional conformity analysis) and meets the criteria for a conformity determination. The project file must include all supporting documentation and this checklist.