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Southern California Association of Governments  
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**To:** Transportation Conformity Working Group (TCWG)

**From:** Naresh Amatya, Manager Transportation Planning and Programming  
Pablo Gutierrez, Program Manager, FTIP Program

**Subject:** 2021 FTIP Modeling Amendment/2023 FTIP/Connect SoCal Consistency  
Amendment to address Conformity Changes due to the expiration of  
EMFAC14 on August 16, 2021

**Date:** July 27, 2021

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**Issues:**

Grace period (24 months) for the use of EMFAC 2014 (Emission Factor Model developed by ARB and approved by US EPA) by the MPOs to demonstrate transportation conformity for Plans (RTP) and Programs (FTIP) will end on August 15, 2021. Starting on August 16, 2021, MPOs must use the most currently approved EMFAC model, which is EMFAC 2017 to demonstrate transportation conformity. Key issues:

- Without timely and substantial emissions reduction adjustments from ARB based on their recently adopted major regulations, 2023 FTIP will not be able to demonstrate transportation conformity due to the required use of ARB's EMFAC2017 model.
- It will be a challenge for ARB to provide the needed adjustments in the near term due to their magnitude. The challenge is likely to be further complicated by the discussion between legal teams of US EPA and ARB regarding the Federal Clean Air Act waiver of preemption requirements as related to major ARB regulations adopted since December 2017.
- Should 2023 FTIP fail to demonstrate conformity, new or amendment of the following capacity expansion projects would not receive federal funding or approval:
  - ✓ Non-exempt projects (mainly mixed-flow highway projects)
  - ✓ TCM projects (HOT/HOV, transit, active transportation, and ITS projects) not in federally approved SIP unless previously authorized

**Proposed SCAG approach to mitigating the situation**

In order to mitigate the potential impacts of conformity lock down past August 16, 2021, SCAG proposes initiating the following:

- Undertake a modeling 2021 FTIP Amendment/2023 FTIP/Connect SoCal Consistency Amendment to account for critical near term capacity projects that would otherwise be

included in 2023 FTIP. And, initiate emissions modeling work before August 16, 2021 using EMFAC2014 and complete all transportation model runs by that date.

- In order to minimize impacts to the 2023 FTIP adoption, SCAG will initiate the modeling of the 2021 FTIP Amendment/2023 FTIP/Connect SoCal Consistency Amendment with the following tentative timeline:
  - ✓ July 1, 2021 – Receive modeling changes from the County Transportation Commissions (CTCs) for the 2021 FTIP Amendment/2023 FTIP/Connect SoCal Consistency Amendment modeling projects
  - ✓ January 6, 2022 – all 2023 FTIP project submittal due to SCAG, including Exempt projects. If it can be determined at this point that there is no need for a separate and early adoption of the model amendment to the 2021 FTIP based on the CTC needs, staff will consolidate the 2021 FTIP amendment into the Draft 2023 FTIP
  - ✓ July 2022 – Present the Draft 2023 FTIP and Consistency Amendment to the Connect SoCal, if needed, to SCAG Polity Committees and Regional Council to release for a 30-day public review.
  - ✓ September 1, 2022 – SCAG adoption of the 2023 FTIP and Consistency Amendment to the Connect SoCal, if needed, and submit to Caltrans.
  - ✓ December 16, 2022 –Federal Approval of the final 2023 FTIP
- If the EMFAC issue is resolved prior to the final project submittal in January 2022, SCAG will perform a full regular 2023 FTIP update, including conformity analysis.
- Two Tentative Schedules under Two Scenarios:

Scenario 1. No EMFAC2017 adjustments available by June 2022

- 1) Submittal of modeling projects to SCAG for the 2021 FTIP Modeling Amendment: July 1, 2021.  
(The purpose of the 2021 FTIP Modeling Amendment is to mitigate potential impact of the conformity lockdown after August 15, 2021)
- 2) Complete all 14 regional transportation model runs/interpolations and start EMFAC2014 model runs: by August 15, 2021.
- 3) Complete all EMFAC2014 model runs by September 30, 2021.
- 4) Submittal of additional NON-MODELING projects such as exempt projects to SCAG: January 6, 2022. NO additional transportation model runs NOR additional EMFAC2014 model runs.
- 5) Public release of Draft 2021 FTIP Modeling Amendment: February/March 2022.
- 6) SCAG Regional Council adoption of 2021 FTIP Modeling Amendment: June/July 2022.
- 7) FHWA/FTA final approval: September/October 2022.

Scenario 2. Adequate EMFAC2017 adjustments available by June 2022

(Draft EMFAC2017 adjustments will need to be provided to SCAG in early May 2022 in order to meet the July public release deadline under this scenario)

- 1) Submittal of modeled projects to SCAG for the 2023 FTIP and 2020 RTP Consistency Amendment #2: July 1, 2021.  
(Note that the projects are the same as those under Scenario 1 above)
- 2) Submittal of additional modeled and non-modeled projects to SCAG: January 6, 2022.
- 3) Complete all regional transportation model runs: April 2022.
- 4) Complete all EMFAC2017 model runs with EMFAC2017 adjustments: April/May 2022.
- 5) Public release of Draft 2023 FTIP and 2020 RTP Consistency Amendment #2: July 2022.
- 6) SCAG Regional Council adoption of 2023 FTIP and 2020 RTP Consistency Amendment #2: September/October 2022.
- 7) FHWA/FTA final approval: December 2022.

If you have any questions, please feel free to contact me at [gutierrez@scag.ca.gov](mailto:gutierrez@scag.ca.gov) , 213-236-1929 or Naresh Amatya at [amatya@scag.ca.gov](mailto:amatya@scag.ca.gov) , (213) 236-1885.