

# Federal Requirements Analysis for 2025 RTIP Amendment No. 11

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## Metropolitan Planning and Transportation Conformity

The U.S. Department of Transportation (U.S. DOT) Metropolitan Planning Regulations<sup>1</sup> and U.S. Environmental Protection Agency (U.S. EPA) Transportation Conformity Regulations<sup>2</sup> establish six criteria requirements which the RTIP must satisfy. The metropolitan planning regulations require that: (1) the RTIP be financially constrained and (2) make progress toward achieving federal performance targets. The transportation conformity regulations state that the RTIP must: (3) be consistent with San Diego Forward: The Regional Plan (Regional Plan); (4) meet regional emissions tests; (5) include timely implementation of transportation control measures (TCMs); and 6) include inter-agency consultation and public involvement.

The 2025 RTIP meets all six tests required under federal metropolitan planning and transportation conformity regulations. SANDAG made these findings for the 2025 RTIP under the required federal tests on September 27, 2024. On December 16, 2024, Federal Highways and the Federal Transit Administration found that the 2025 RTIP conforms with the provisions of 40 CFR Parts 51 and 93. Amendment No. 11 continues to meet all federal requirements.

### Financial Constraint Test

Federal regulations 23 CFR Section 450.326(j) require the 2025 RTIP to be a revenue-constrained document with programmed projects based upon available or committed funding and/or reasonable estimates of future funding. Chapter 4 of the 2025 RTIP discusses in detail the financial capacity analysis of major program areas, including a discussion of available revenues.

*Finding:* The projects contained within the 2025 RTIP, including Amendment No. 11, are reasonable when considering available funding sources as demonstrated in Tables 3a through 3c, including a comparison from the prior approved version (changes are highlighted in yellow.)

### Performance Management Test

Federal regulations 23 CFR Section 450.326(c) require the 2025 RTIP to be designed such that once implemented, it makes progress toward achieving the performance targets established under 450.306(d) and shall include, to the maximum extent practicable, a description of the anticipated effect of the RTIP toward achieving the performance targets identified in the transportation plan, linking investment priorities to those performance targets. Appendix H of the 2025 RTIP provides information on the projects which support safety and transit asset management performance management requirements.

*Finding:* The projects contained within the 2025 RTIP, including Amendment No. 11, make progress toward achieving the performance targets for all performance-based planning requirements established by the Board of Directors.

### Consistency with San Diego Forward: The Regional Plan Test

*Finding:* The 2025 RTIP, through Amendment No. 11, is consistent with San Diego Forward: The Amended 2021 Regional Transportation Plan (2021 Regional Plan) adopted on December 10, 2021 (policies, programs, and projects). All projects conform to the scope, cost, and schedule included in the 2021 Regional Plan.

## Regional Emissions Tests

These findings are based on the regional emissions analyses' tests shown in Table 5-2 in Chapter 5 of the 2025 RTIP.

*Finding:* The regional emissions analyses for the 2025 RTIP through Amendment No. 11 are consistent with the emissions analyses for the 2021 Regional Plan.

*Finding:* The proposed amendment does not reflect a change in the design, concept, or scope of the projects or the conformity analysis years as modeled for the regional emissions analysis of the 2021 Regional Plan and the 2025 RTIP, as amended.

*Finding:* The 2025 RTIP, including Amendment No. 11, remains in conformance with the applicable State Implementation Plan<sup>3</sup> (SIP).

## Timely Implementation of TCM Test

*Finding:* The TCMs, established as Transportation Tactics in the 1982 SIP, have been fully implemented and Amendment No. 11 continues to fund the four TCMs, which include: (1) ridesharing; (2) transit improvements; (3) traffic flow improvements; and (4) bicycle facilities and programs.

## Inter-Agency Consultation and Public Involvement Test

*Finding:* The 2025 RTIP complies with all federal and state requirements for public involvement by following the strategies described in Board Policy No. 025: Public Participation Plan Policy. Amendment No. 11 was posted for a 20-day public comment period from November 14, 2025, through December 4, 2025.

*Finding:* The SANDAG Conformity Working Group (CWG), including members from the San Diego County Air Pollution Control District, Caltrans, California Air Resources Board, SANDAG, U.S. DOT, and U.S. EPA, serve as a forum to meet the federal and state requirements for interagency consultation for the 2025 RTIP. All exempt projects in Amendment No. 11 were submitted to the CWG on November 14, 2025, for its review and members concurred with the exempt categorization.

<sup>1</sup> 23 Code of Federal Regulation (CFR) Part 450, subpart C

<sup>2</sup> 40 CFR part 93, subpart A

<sup>3</sup> 2020 Plan for Attaining the National Ozone Standards Plan for San Diego County, which were found adequate for transportation conformity purposes by the U.S. Environmental Protection Agency effective October 2021