

# **Air Quality Report**

OR-126B: 54th St Signal Improvements

Lane County

Key Number 20209

Prepared by: Robert Schiavone, Region 1 Air Quality and Noise Specialist Reviewed by: Natalie Liljenwall, Air Quality Program Coordinator and Noise Engineer, P.E.

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# **Summary**

This Air Quality Report was prepared to support the OR126B at 54th St. Project, National Environmental Policy Act (NEPA) Programmatic Categorical Exclusion (CE). The project is adding turning lanes to OR126 which is located within Springfield; and is within the Eugene-Springfield PM10 Limited Maintenance Area within Lane County, Oregon. The project is subject to conformity as turning lanes are not exempt from project level conformity. Through interagency consultation on July 28th, 2021, it was determined that this project is not a Project of Air Quality Concern (POAQC) and does not require a quantitative hot spot analysis. The PM10 concentrations with the project would be well below the National Ambient Air Quality Standards (NAAQS); therefore, the project would not impact air quality. All other criteria pollutants are in attainment with the NAAQs. Relative to existing conditions, mobile source air toxics (MSATs) are expected to decrease in the future. This project is not expected to impact air quality.

# **Project Description**

The intersection at OR-126B and 54<sup>th</sup> St in Springfield, OR has been identified as a hot spot for higher than normal frequency or severity of vehicle crashes (Figure 1). To help improve safety at this intersection, the project will do the following:

- Add left turn lanes on 54th Street.
- Upgrade signals to add a dedicated turn light for the new turn lanes to allow cars to turn safely.
- Update signal timing to allow pedestrians to cross during a dedicated walk phase.
- Update lighting at intersection for better visibility.
- Update signal and install ADA compliant curb ramps to improve accessibility.



# **Traffic Data**

The traffic data was prepared by Arielle Ferber, ODOT Traffic Analysis Engineer, on March 30, 2021 for this project and is summarized in Table 1. The traffic data was based on the data available for the Existing Year 2018, Opening Year 2024, and Design Year 2044.

OR-126 is a state highway that connects coastal, western, and central parts of Oregon. This highway has a business loop (OR-126B) centered in Springfield starting at I-205 and ending at McKenzie Hwy (OR-126). The highway section traveling through the project area has an Existing Year (2018) traffic count of 15,700 vehicle with 10% of these being diesel trucks. The expected increase at the Design Year (2044) is 23,520 vehicles with 10% of these being diesel trucks.

Table 1: Traffic data for PM10 analysis

	Existing Year	Opening Year	Opening Year	Design Year	Design Year
	2018	2024	2024	2044	2044
	No Build	No Build	Build	No Build	Build
AADT	15,700	17,500	17,500	23,520	23,520
Speed	35 MPH	35 MPH	35 MPH	35 MPH	35 MPH
% diesel	10%	10%	10%	10%	10%

# **Existing Air Quality**

Eugene-Springfield completed their 20 years under a CO maintenance plan on February 4, 2014. There are no longer any transportation conformity requirements for CO in the Eugene-Springfield Area.

Eugene-Springfield became a limited maintenance area for PM<sub>10</sub> on May 13, 2013. Limited maintenance plans do not require regional emission analysis for conformity. A PM<sub>10</sub> project level conformity analysis is still required for projects in the. The Lane County Council of Governments (LCOG) is responsible for regional transportation conformity in the Eugene-Springfield area.

# PM<sub>10</sub> Analysis

Project level conformity is required in because the project is within the Eugene-Springfield PM<sub>10</sub> Limited Maintenance Area and the project adds turning lanes which is considered channelization under 40 CFR 93.127. Projects in PM<sub>10</sub> areas must be assessed to determine if they are a Project of Local Air Quality Concern (POAQC) according to 40 CFR 93.123(b)(1)(i-v). POAQC projects are required to have a quantitative PM<sub>10</sub> hot spot analysis. An interagency consultation was held with FHWA, FTA, DEQ and EPA to determine if the project is a POAQC. Through interagency consultation on July 28, 2021, it was determined that this project is not a POAQC. See Appendix A for additional information. A summary of the project findings to each criteria is given below.

The build AADT volume for the Opening Year (2024) is 15,700 and the No Build/Build Design Year (2037) is 23,520 (Table 1). The maximum percentage of diesel vehicles across all links in both the opening and years is 10%. The project area is in a mostly sparsely populated rural area with some residential housing tracts.

## This project does not apply to the criteria in 40 CFR 93.123(b)(1)(i-v).

- (i) These numbers are well below the EPA example of a POAQC project having an AADT of 125,000 AADT; and though the percentage of diesel vehicles is above the example of 8%, the total number of vehicles is far enough below the example that the actual number of diesel trucks will be low. (EPA, 2015)
- (ii) No intersection with LOS of D, E or F.
- (iii) No new bus or rail terminals or transfer points are part of this project.
- (iv) No expanded bus or rail terminals or transfer points are part of this project.
- (v) The SIP does not indicate specific intersection/interchanges.

Since the project is not a Project of Local Air Quality Concern, the requirement of the Clean Air Act and Amendments (CAAA) and 40 CFR 93.116 are met without a hot-spot analysis. The project is designed to improve vehicle and pedestrian safety, and would be expected to have a neutral influence on PM<sub>10</sub> emissions.

# **Project-level Conformity With State Implementation Plan**

Conformity determination statement:

- The Project is the same in design concept and scope as the project that is listed in the Central Lane Metropolitan Planning Organization (MPO) 2021-2024 Metropolitan Transportation Improvement Program (MTIP) for key number 20209 (Figure 4) (Central Lane MPO 2020).
- The Project will not cause or contribute to any new hot spot violations of the NAAQs
- The Project will not increase the severity and frequency of an existing NAAQS violation or standard
- The Project will not delay timely attainment of NAAQS or any regulation.

Consequently, the Project will be in conformance with the SIP.

OR126B at 54th St.		Add intersection imp	rovements to er	nhance safety				RTP (	Objective #1; TSI F	loadway	EXEMP.	T / Safety - HSIP	
(Springfield)	40					S	S	Polic	y #1				
20209 20	18 PE	\$212,500.00	HSIP ZS32	\$0.00	ODOT		\$212,50	00.00				\$212,500.00	
20209 20	22 RW	\$4,057.68	HSIP ZS30	\$342.32	ODOT		\$4,4	00.00				\$4,400.00	
20209 20	22 UR	\$50,444.34	HSIP ZS30	\$4,255.66	ODOT		\$54,7	00.00				\$54,700.00	
20209 20	23 CN	\$1,263,137.34	HSIP ZS30	\$106,562.66	ODOT	\$:	1,369,7	00.00				\$1,369,700.00	
TOT	AL	\$1,530,139.36		\$111,160.64		\$1	1,641,30	00.00	\$0.00			\$1,641,300.00	

Figure 2: MTIP entry

# **Mobile Source Air Toxics (MSAT) Analysis**

This project is considered categorically excluded under 23 CFR 771.117(c)(26)

"Modernization of a highway by resurfacing, restoration, rehabilitation, reconstruction, adding shoulders, or adding auxiliary lanes (including parking, weaving, turning, and climbing lanes), if the action meets the constraints in paragraph (e) of this section."

The purpose of this project is to reduce the number and severity of vehicle crashes at this intersection by installing left hand turn lanes on 54<sup>th</sup> St in conjunction with installing lighting and flashing left hand turn lights. This project has been determined to

generate minimal air quality impacts for Clean Air Act criteria pollutants and has not been linked with any special mobile source air toxic (MSAT) concerns. As such, this project will not result in changes in traffic volumes, vehicle mix, basic project location, or any other factor that would cause a meaningful increase in MSAT impacts of the project from that of the no-build alternative.

Moreover, Environmental Protection Agency (EPA) regulations for vehicle engines and fuels will cause overall MSAT emissions to decline significantly over the next several decades. Based on regulations now in effect, an analysis of national trends with EPA's MOVES2014 model forecasts a combined reduction of over 90 percent in the total annual emissions rate for the priority MSAT from 2010 to 2050; while vehicle-miles of travel are projected to increase by over 45 percent (Updated Interim Guidance on Mobile Source Air Toxic Analysis in NEPA Documents, Federal Highway Administration, October 12, 2016). This will both reduce the background level of MSAT as well as the possibility of even minor MSAT emissions from this project.

# **Indirect Source Construction Permit**

Highway OR126b in the project area is anticipated to have an increase of AADT to 20,000 within 10 years after completion, based upon the Design Year AADT of 23,530. The Lane Regional Air Protection Agency Title 20, Section 20.115 (2) (a) (B) states:

"Any highway section being proposed for construction with an anticipated annual Average Daily Traffic volume of 20,000 or more motor vehicles per day within ten years after completion, or being modified so that the annual Average Daily Traffic on that highway section will be increased to 20,000 or more motor vehicles per day or will be increased by 10,000 or more motor vehicles per day within ten years after completion."

However, Section 20-110 (15) defines a highway section:

"Highway Section" means a highway of substantial length between logical termini (major crossroads, population centers, major traffic generators, or similar major highway control elements) as normally included in a single location study or multi-year highway improvement program."

The project area only encompasses a single intersection on OR-126b; therefore an Indirect Source Construction Permit will not be required for this project.

## **Construction Activities**

Construction would result in temporary and localized increases in PM10 and other air pollutant levels. These emissions are the result of fossil fuel combustion by heavy construction equipment and lowered traffic speeds.

## Construction Mitigation

Mitigation measures for potential temporary construction impacts normally include best management practices for dust suppression. Construction contractors are required to comply with Division 208 of Oregon Administrative Rules (OAR 340), which addresses visible emissions and nuisance requirements. Subsection of OAR 340-208 places limits on fugitive dust that causes a nuisance or violates other regulations. Violations of the regulations can result in enforcement action and fines. The regulation provides that the following reasonable precautions be taken to avoid dust emissions (OAR 340-208, Subsection 210):

- Use, where possible, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads or the clearing of land;
- Application of water or other suitable chemicals on unpaved roads, materials stockpiles, and other surfaces which can create airborne dusts;
- Full or partial enclosure of materials stockpiles in cases where application of water or other suitable chemicals are not sufficient to prevent particulate matter from becoming airborne;
- Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials;
- Adequate containment during sandblasting or other similar operations;
- Covering, at all times when in motion, open bodied trucks transporting materials likely to become airborne;
- The prompt removal from paved streets of earth or other material that does or may become airborne.

ODOT also requires construction contractors comply with the ODOT standard specification Section 290. These control measures, which include vehicle and equipment idling limitations, are designed to minimize vehicle track-out and fugitive dust. These measures would be documented in the erosion and sediment control plan the contractor is required to submit prior to the preconstruction conference. To reduce the impact of construction delays on traffic flow and resultant emissions, road or lane closures should be restricted to non-peak traffic periods, when possible.

## References

Central Lane Metropolitan Planning Organization, 2020. "Metropolitan Transportation Improvement Program." Approved November 5<sup>th</sup>, 2020.

City of Springfield, Springfield Urban Growth Boundary [Map]. Technical Services Division. April 5, 2011.

Determining Conformity of Federal Actions to State or Federal Implementation Plans, 40 C.F.R. § 93 (2021). Retrieved July 2021.

Environmental Impact and Related Procedures, 23 C.F.R. § 771 (2021). Retrieved July 2021.

Environmental Protection Agency (EPA), 2015. "Transportation Conformity Guidance for Quantitative Hot-spot Analyses in PM2.5 and PM10 Nonattainment and Maintenance Areas." Transportation and Climate Division, Office of Transportation and Air Quality. November 2015.

Federal Highway Administration (FHWA), 2016. "Updated Interim Guidance on Mobile Source Air Toxic Analysis in NEPA Documents." Memorandum from Emily Biondi, Director of Office of Natural Environment. October 18, 2016

Ferber, A. 2021. "Traffic for Air Quality.xlsx". Requested from ODOT Traffic. Original email/spreadsheet received March 30, 2021.

Lane Regional Air Protection Agency (LRAPA), 1990. Title 20 Indirect Sources. Retrieved September 2021.

Oregon Department of Transportation (ODOT), 2018. ODOT Air Quality Manual. October 2018.

Oregon Department of Environmental Quality (DEQ). "Oregon Administrative Rules, Chapter 340, Division 254, Rules for Indirect Sources." Retrieved July 2021.

Oregon Department of Environmental Quality (ODEQ). "Oregon Administrative Rules, Chapter 340, Division 252, Transportation Conformity". Retrieved July 2021.

Oregon Department of Transportation (ODOT), 2021. "ACTIVE 2021-2024 STIP STATEWIDE TRANSPORTATION IMPROVEMENT PROGRAM". Printed July 11<sup>th</sup>, 2021.



The purpose of this checklist is to provide the required PROJECT LEVEL documentation to aid the interagency consultation group in the determination of project type, i.e.

- 1) **Exempt -** Exempt from PM10 or PM2.5 project-level conformity determination,
- 2) Not Exempt, Not of Concern- Not Exempt, but not of local air quality concern (does not require further analysis), or
- 3) Of Concern Of local air quality concern and, therefore, requiring a hot-spot analysis.

This checklist is only intended as a tool to assist with the  $PM_{2.5}$  project-level conformity determination and does not replace regulatory requirements in the Transportation Conformity Rule (40 CFR Part 93), nor associated guidance. Any decisions regarding a particular conformity determination or hot-spot analysis will be made based on the statute and regulations, after appropriate public input. A statement regarding the  $PM_{2.5}$  hot-spot consideration should be included as an element in NEPA documentation. This completed and signed checklist, along with a copy of the  $PM_{2.5}$  project-level conformity determination, if required, should also be included. Additionally, proof of interagency consultation and public involvement, if required, as well as any other supporting documentation, should be included.

Use the "Tab" or "Page Down" key to maneuver within this document.

#### **STEP 1: PROJECT IDENTIFICATION**

A. STIP Number: 20209

Project Name/Short Description: OR-126B: 54th St Improvement: This is a safety project.

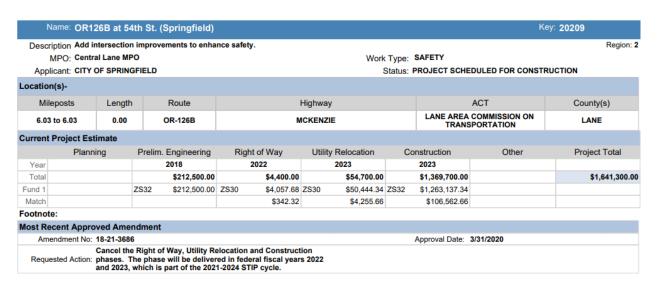
- Install left turn lanes on 54th Street.
- Upgrade signals to add a dedicated turn light for the new turn lanes to allow cars to turn safely.
- Update signal timing to allow pedestrians to cross during a dedicated walk phase.
- Update lighting at intersection for better visibility.
- Update signal and install ADA compliant curb ramps to improve accessibility.
- B.
- C. County: Lane
- D. PM<sub>10</sub> or PM <sub>2.5</sub> Nonattainment or Maintenance Area Eugene Springfield Limited Maintenance area
- E. PM<sub>10</sub> Designation : Maintenance
- **F. PM<sub>10</sub> Standard Associated with Designation:** 24 hours, not to exceed 150 ug/m<sup>3</sup> more than once per year on average over 3 years
- **G. Additional Project Information:** OR126B at 54<sup>th</sup> Street, Springfield. Only left turn lanes are being added. MP 6.03 to 6.03. Not capacity adding

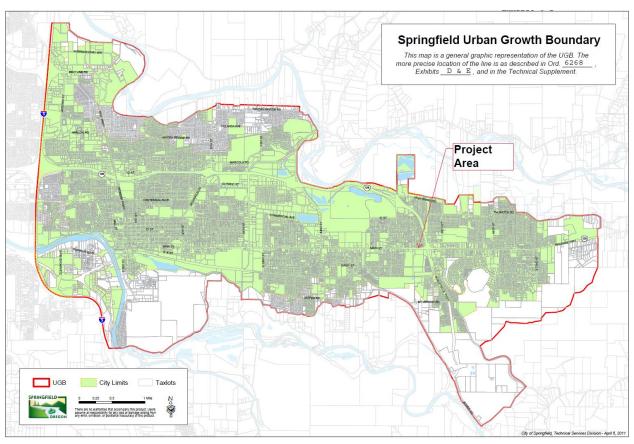
Information should include, but is not limited to:

- a. Purpose and need of the project.
- b. Route name, route number, project length, and mile point locations
- c. Number of current and future lanes (clearly indicate if any lanes are "turn lane only")
- d. Identify as "Capacity Adding" or "Non Capacity Adding" project
- e. Identify intersecting roads that will be impacted
- H. NEPA Document Type: CE
- I. Project Sponsor (click on box & select from drop-down menu): City of Springfield (if "other", describe)

# J. Included in a "Conforming" MPO TIP or STIP? yes (MPO-Metropolitan Planning Organization; Transportation Improvement Program (TIP); State Transportation Improvement Program (STIP))

K. Location of project in TIP/STIP (list name of document and page number or amendment number): STIP 20209





## STEP 2: EXEMPT STATUS

NOT AN EXEMPT PROJECT. Go to STEP 3.
EXEMPT PROJECT (those listed in 40 CFR 93.126 and traffic signal synchronization projects under 93.128).  IAC review and approval are required to confirm that project is exempt. Select one from the list below. Include IAC review and approval documentation with this checklist, but no PM <sub>2.5</sub> project-level conformity is required and no further documentation is needed. Go to STEP 6
Air Quality ☐ Bicycle and pedestrian facilities ☐ Continuation of ride-sharing and van-pooling promotion activities at current levels
Mass Transit  Construction of new bus or rail storage/maintenance facilities categorically excluded in 23 CFR part 771  Construction of small passenger shelters and information kiosks  Construction or renovation of power, signal, and communications systems  Operating assistance to transit agencies  Purchase of new buses and rail cars to replace existing vehicles or for minor expansion of the fleet. In PM10 and PM2.5 nonattainment or maintenance areas, such projects are exempt only if they are in compliance with control measures in the applicable implementation plan  Purchase of office, shop, and operating equipment for existing facilities  Purchase of operating equipment for vehicles (e.g., radios, fareboxes, lifts, etc.)  Purchase of support vehicles  Reconstruction or renovation of transit building and structures (e.g., rail or bus building, storage and maintenance facilities, stations, terminals and ancillary structures)  Rehabilitation of transit vehicles – In PM10 and PM2.5 nonattainment or maintenance areas, such projects are exempt only if they are in compliance with control measures in the applicable implementation plan  Rehabilitation or reconstruction of track structures, track, and trackbed in existing rights-of-way
Safety Adding medians Emergency relief (23 U.S.C. 125) Emergency truck pullovers Fencing Guardrails, median barriers, crash cushions Hazard Elimination Program Increasing Sight Distance Lighting improvements Pavement marking demonstration Pavement resurfacing and/or rehabilitation Railroad/highway crossing Railroad/highway crossing warning devices Reconstructing bridges (no additional travel lanes) Safet y improvement program Safety improvement program Safety improvements Skid treatments Truck Climbing lanes outside the urbanized area Widening narrow pavement (no additional travel lanes)
Other
<ul> <li>Federal-aid systems revisions</li> <li>Grants for training and research programs</li> <li>Planning activities conducted pursuant to titles 23 and 49 USC</li> <li>Planning and technical studies</li> <li>Traffic signal synchronization (40 CFR 93.128)</li> <li>Transportation enhancement activities (except rehabilitation and operation of historic transportation buildings, structures, or facilities)</li> </ul>

## **STEP 3: TRAFFIC INFORMATION**

#### A. Worst Case Scenario

- a. Location (usually an intersection): OR126B and 54th St in Springfield
- **b.** Year (usually the open-to-traffic year): 2024
- c. Justification for worst case year chosen (include forecasting assumptions): Opening year

### **B.** Project Data

#### a. Project Data for Current Year

(use worst case scenario; if at an intersection, include both roadways individually and in total; if at an intersection, average AADT on either side of intersection to obtain AADT for roadway at intersection)

- i. Annual Average Daily Traffic (AADT): 15,700
- ii. Percentage and/or number of diesel vehicles (trucks and buses): 10%
- iii. Intersections at Level of Service D, E, or F: none, LOS A
  Level of Service (LOS) refers to a standard measurement used by transportation officials which reflects the relative
  ease of traffic flow on a scale of A to F, with free-flow being rated LOS-A and congested conditions rated as LOS-F.

#### b. Project Data for Worst Case Year for No Action Scenario

(use worst case scenario; if at an intersection, include both roadways individually and in total)

- i. Annual Average Daily Traffic (AADT): 17,500
- ii. Percentage and number of diesel vehicles (trucks and buses): 10%
- iii. Intersections at Level of Service D, E, or F: none, LOS B
  Level of Service (LOS) refers to a standard measurement used by transportation officials which reflects the relative
  ease of traffic flow on a scale of A to F, with free-flow being rated LOS-A and congested conditions rated as LOS-F.
- iv. Impact of No Action: None

#### c. Project Data for Worst Case Year for Build Scenario

(use worst case year and location; if at an intersection, include both roadways individually and in total)

- i. Annual Average Daily Traffic (AADT): 23,520
- ii. Percentage and number of diesel vehicles (trucks and buses): 10%
- iii. Intersections at Level of Service D, E, or F: none, LOS B
  Level of Service (LOS) refers to a standard measurement used by transportation officials which reflects the relative
  ease of traffic flow on a scale of A to F, with free-flow being rated LOS-A and congested conditions rated as LOS-F.
- iv. Impact of Project: none

## **Additional Traffic Data**

	OR 126B at 54th Street										
		Existing \	ear 2018	Opening Year 2024		Opening	Year 2024	Design Y	ear 2044	Design Year 2044	
	Parameters	No Build		No Build		Build		No Build		Build	
		AM	PM	AM	PM	AM	PM	AM	PM	AM	PM
	Sum of approaching volumes	1145	1620	1383	1980	1383	1980	1808	2595	1808	2595
Intersection	Level of Service (LOS)	А	А	А	В	В	В	А	В	В	В
intersection	Intersection Delay (seconds)	6.9	7.9	8.2	10.4	10.6	14.0	9.6	14.5	11.9	18.0
	Volume to Capacity Ratio (V/C)	0.44	0.52	0.51	0.59	0.47	0.63	0.61	0.74	0.57	0.68
	AADT	15,700		17,500		17,500		23,520		23,520	
Road Link	Speed	35 MPH		35 MPH		35 MPH		35 MPH		35 MPH	
(OR 126B)		1570		1750		1750		2352		2352	
	% diesel	10%		10%		10%		10%		10%	

Figure of Project Area



## STEP 4: AIR QUALITY CONCERN DETERMINATION

NOT PROJECT OF AIR QUALITY CONCERN. Hot-spot analysis is NOT required. However, InterAgency Consultation (IAC) approval is required. Provide checklist and other relevant documentation to IAC. IAC will determine level of public involvement required. Use space provided to summarize data and rationale for this conclusion.  (Refer to EPA's November 2015 guidance, EPA420-B-15-084, and FHWA's FAQ document, for complete details).
IAC Approval through Teams meeting July 28, 2021. IAC members included Adam Clark/EPA, Rachael Tupica/FHWA, Jeremy Borrego/FTA and Max Hueftle/LRAPA.
Go to STEP 6.
☐ PROJECT OF AIR QUALITY CONCERN. Select one from the list below. Hot-spot analysis IS required. Convene interagency consultation (IAC) meeting and begin to create the hot-spot analysis document. <b>Go to STEP 5.</b>
New or expanded highway projects with a significant number of, or increase in, diese vehicles (e.g., 125,000 AADT and 10,000 (8%) diesel truck traffic) Note: The example of 125,000 AADT and 10,000 (8%) diesel truck traffic are not exact threshold values and should not be viewed as such.  Traffic volumes are much lower than 125,000 AADT (23,520). Truck volumes are much less than 10,000 AADT (2352) although % diesel is higher than 8%
Project affecting intersections that are at LOS D, E, or F with a significant number of diesel vehicles, or those that will change to LOS D, E, or F because of increased traffic volumes from a significant number of diesel vehicles related to the project.  No intersection with LOS of D, E or F
<ul> <li>         ☐ New bus and rail terminals and transfer points that have significant number of diesel vehicles congregating at a single location.     </li> <li>No new bus or rail terminals or transfer points are part of this project</li> </ul>
Expanded bus and rail terminals and transfer points that significantly increase the number of diesel vehicles congregating at a single location.  No expanded bus or rail terminals or transfer points are part of this project.
☐ Projects in or affecting locations, areas, or categories of sites which are identified in the PM₁₀ and PM₂.₅ applicable implementation plan or implementation plan submissions, as appropriate, as sites of violation or possible violation.  The SIP does not indicate specific intersection/interchanges.

### STEP 5: ANALYSIS AND DOCUMENTATION (for Project of Air Quality Concern)

The following is a summary of documentation to be included for PM<sub>2.5</sub> hot-spot analysis and does not replace information that will be provided for a full quantitative analysis if this analysis is required.

## Documentation to be Included for the PM<sub>2.5</sub> Hot-spot Analysis

- Description of project (location, design and scope; date project is expected to be open, i.e., what part of 93.123(b) (1) applies)
- Description of type of emissions considered in the analysis
- Contributing Factors
  - Air Quality
  - Transportation and traffic conditions
  - Built and natural environment
  - Meteorology, climate and seasonal data
  - Adopted emissions control measures
- Consider full time frame of area's LRTP
- Description of existing conditions
- Description of changes resulting from project
- Description of method chosen
- Description of analysis years
- Examine year in which emissions are expected to peak
- Profession judgment of impact
- Discussion of why project will not cause a violation of either the annual or 24-hour standard
- Discussion of any mitigation measures
- Written commitments for mitigation
- Conclusion on how project meets 40 CFR 93.116 and 93.123

## STEP 6: MEETING, NOTICES, DATES

#### A. IAC Approval Date: 7/28/21

(Project sponsor is lead; attach meeting minutes, if applicable, and/or hard copies of applicable e-mails showing IAC review request and approval)

#### B. Public Involvement

- a. Public review & comment period (should be consistent with NEPA process; list dates, and if applicable, attach copy of public notice and newspaper proof of publication): Will take place through the NEPA Process
- b. Public concerns addressed (if applicable include hard copy or e-mails with cc to IAC):

	STEP 7: SIGNATURES		
Jeffrey Lange	Jeffrey Lange	09/14/21	
Project Manager	108	Date	
S. Natalie Liljenwall	17 Tiljenwall	8/9/21	
Division of Environmental Analysis	Date		