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Federal Transit
Administration –
Region 9

Transportation Management Area Planning Certification Review

Pima Association of Governments Tucson, AZ

August 24, 2023

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Summary Report





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1.0 EXECUTIVE SUMMARY

On April 18, 2023, the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) conducted the certification review of the transportation planning process for the Tucson urbanized area. The Pima Association of Governments (PAG) is the metropolitan planning organization (MPO)/responsible party for transportation planning for the Tucson urbanized area.

FHWA and FTA are required to jointly review and evaluate the transportation planning process for each urbanized area over 200,000 in population at least every four years to determine if the process meets Federal transportation planning requirements.

1.1 Previous Findings and Disposition

PAG's transportation planning process was last certified in June 2019. FHWA and FTA found the transportation planning process to meet federal regulations. The specific findings and disposition of the findings that resulted from that review can be found in Appendix B.

1.2 Summary of Current Findings

As a result of the review on April 18, 2023, FHWA and FTA find the transportation planning process of PAG continues to meet federal planning requirements. A letter certifying this finding was transmitted with this final report. A copy of the letter can be found in Appendix F of this report.

There are recommendations in this report that PAG might consider to strengthen its transportation planning process. The recommendations listed in this report are areas where the federal review team sees room for continued improvement, but do not indicate deficiencies in the MPO's planning process. The report also highlights some areas that the MPO is performing very well in that are to be commended.

2.0 INTRODUCTION

2.1 Background

Pursuant to 23 U.S.C. 134(k) and 49 U.S.C. 5303(k), the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) must jointly certify the metropolitan

transportation planning process in Transportation Management Areas (TMAs) at least every four years. A TMA is defined as an urbanized area over 200,000 in population based on Census figures.

The planning certification review process is individually tailored to focus on topics of significance in each TMA. The federal team prepares a certification report to document the results of the review process. This review focuses on compliance with federal regulations, challenges, successes, and experiences of the cooperative relationship between PAG, FHWA, FTA, the Arizona Department of Transportation (ADOT), the Regional Transportation Authority (the voter-approved regional transportation taxing authority in the Tucson urbanized area) and operators of public transportation, such as Sun Tran (the metropolitan transit operator).

In general, the planning certification review consist of three primary activities: a site visit, a review of planning products (before and during the site visit), and preparation of a report that summarizes the review and offers findings. The certification review also includes a public input period opportunity. The Federal team distributes notice of the opportunity with the assistance of PAG staff. The notice is distributed to PAG's electronic distribution list. The notice invites stakeholders and the public to provide input to the federal team relating to the transportation planning process for the PAG region. Some of the planning products reviewed include the:

- **Unified Planning Work Program (UPWP).** The UPWP is a biennial statement of work that outlines an MPO's proposed planning activities, resulting products and associated costs with completing this work. The UPWP also includes budget tables that document the MPO's administrative costs.
- **Regional Transportation Plan (RTP).** The RTP is a federally-required planning document that requires MPOs to establish regional transportation priorities for the next 20 years. MPOs must update this document every four or five years, depending on a region's air quality designation.
- **Transportation Improvement Program (TIP).** The TIP is a federally-required document, which lists all transportation projects within an MPO that are either set to receive federal funding or that have been identified as "regionally significant," irrespective of whether the project will receive federal funding. The TIP focuses on projects that are programmed to be funded within upcoming years. FHWA and FTA only recognize the first four years of TIP project listings, as required under 23 CFR 450.326(a). Any project listings beyond that time frame are considered informational only.
- **Air quality conformity determinations** (in nonattainment and maintenance areas). Air quality conformity determinations are required in metropolitan areas that have been

identified as being in violation, or non-attainment, of air quality standards established by the Clean Air Act, either in the past or currently.

The certification review process is one of several methods FHWA and FTA use to assess the quality of the region's metropolitan transportation planning process, compliance with applicable federal statutes and regulations, and the level and type of technical assistance that may be needed to enhance the effectiveness of the metropolitan transportation planning process.

2.2 Purpose and Objective

Since the enactment of the Intermodal Surface Transportation Efficiency Act (ISTEA) of 1991, FHWA and FTA are required to jointly review and evaluate the transportation planning process in all urbanized areas over 200,000 population to determine if the process meets the federal planning requirements in 23 U.S.C. 134, 40 U.S.C. 5303, and 23 CFR 450. The Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU), extended the minimum allowable frequency of certification reviews to at least every four years. FHWA and FTA's most recent certification reviews of PAG were completed in 2011, 2015, and 2019. The Bipartisan Infrastructure Law, as enacted in the Infrastructure Investment and Jobs Act did not change this requirement.

Certification of the planning process is a prerequisite to the approval of federal funding for transportation projects in such areas. The certification review is also an opportunity to provide technical assistance on new programs and to enhance the ability of the metropolitan transportation planning process to provide decision makers with the knowledge they need to make well-informed capital and operating investment decisions.

The Pima Association of Governments (PAG) is the designated MPO for the Tucson Transportation Management area. PAG is comprised of eight member agencies which include:

- City of Tucson
- City of South Tucson
- Town of Marana
- Town of Oro Valley
- Town of Sahuarita
- Tohono O'odham Nation
- Pascua Yaqui Tribe
- Pima County

One elected official representing each of those member agencies, along with a representative from the Arizona State Transportation Board, compose the nine-member PAG Regional Council. The Regional Council serves as PAG's governing body. The Arizona Department of Transportation (ADOT) is the responsible state agency. Sun Tran is the metropolitan public transportation operator and provides services alongside other transit operators such as the RTA (which provides services outside the metropolitan and urbanized areas) and the Town of Oro Valley (which provides dial-a-ride and paratransit services within its jurisdiction). PAG also manages the Regional Transportation Authority (RTA), which is the fiscal manager of a \$2.1 billion, 20-year sales tax approved by Pima County voters in 2006.

3.0 SCOPE AND METHODOLOGY

3.1 Review Process

In addition to FHWA and FTA (the federal review team), participants in the review included representatives from PAG and ADOT. A list of participants is included in Appendix A.

A desk audit of current planning products, documents and correspondence was completed prior to and during the site visit. The desk audit enabled FHWA and FTA to focus the site visit on emerging topics and topics in which the agencies had additional questions, eliminating topic areas where it is apparent that the region's planning process is compliant with current federal laws and regulations. In addition to the formal review, routine oversight mechanisms provide a major source of information upon which to base the certification findings.

In addition, the federal review team sought input from the public and other stakeholders on the transportation planning process in the region during the certification review process. With assistance from PAG staff, the team utilized an electronic media outreach approach through PAG's extensive email list to solicit input from stakeholders. Prior to the 2019 review, the federal team would hold in person public feedback sessions in conjunction with certification reviews that were sparsely attended. For the 2019 and this review, public input was collected electronically following email blasts by PAG staff. The public input was collected in March, April and May 2023. Input was received by various stakeholders, including but not limited to members of the public, member agencies, associations, and committee members. The input ranged from supporting and positive to concern of processes and transparency. The comments received are included in Appendix C. The federal review team discussed and considered the comments during the review. No comments led to a decision to not recertify.

The certification review covers the transportation planning process conducted cooperatively by the MPO, State, and public transportation operators. Background information, status, key findings, and recommendations are summarized in the body of the report for the following subject areas:

- Metropolitan Planning Area Boundaries
- MPO Structure and Agreements
- Unified Planning Work Program (UPWP)
- Regional Transportation Plan (RTP)
- Transit Planning
- Transportation Improvement Program (TIP)
- Public Participation
- Civil Rights (Title VI, EJ, LEP, ADA)
- Consultation and Coordination
- List of Obligated Projects
- Freight Planning
- Environmental Mitigation/Planning Environmental Linkage
- Transportation Safety
- Transportation Security Planning
- Nonmotorized Planning/Livability
- Integration of Land Use and Transportation
- Travel Demand Forecasting
- Air Quality
- Congestion Management Process / Management and Operations
- Performance Management

3.2 Documents Reviewed

The following PAG documents were evaluated as part of this planning process review:

- FY 2022-2023 and FY 2024-2025 Unified Planning Work Programs (UPWP)
- 2045 RMAP (Regional Mobility and Accessibility Plan)
- PAG Congestion Management Process (CMP)
- PAG Title VI and Environmental Justice Plan
- PAG Public Involvement Plan
- 2019 PAG Certification Report

4.0 PROGRAM REVIEW

4.1 Metropolitan Planning Area Boundaries

4.1.1 Regulatory Basis

23 U.S.C. 134(e) and 23 CFR 450.312(a) state the boundaries of a Metropolitan Planning Area (MPA) shall be determined by agreement between the MPO and the governor. At a minimum, the MPA boundaries shall encompass the entire existing urbanized area (as defined by the Bureau of the Census) plus the contiguous area expected to become urbanized within a 20-year forecast period for the MTP.

4.1.2 Status

On May 9, 2013 the region's Urbanized Area Boundary (UAB) and Metropolitan Planning Area (MPA) were adjusted to reflect 2010 Census data. The boundary expansions were primarily around the outlying communities of Sahuarita, Marana and Vail.

As a result of the 2020 Census, the US Census Bureau expanded the Tucson urbanized area. PAG will expand its Metropolitan Planning Area (MPA) to reflect such changes before the December 29, 2026 deadline.

4.1.3 Findings

As documented in the 2019 certification report, the redesignation actions of 2013 were compliant with 23 U.S.C. 134(e) and 23 CFR 450.312(a), and the provisions that regulate redesignation in 23 CFR 450.310(b).

4.2 MPO Agreements and Structure

4.2.1 Regulatory Basis

23 U.S.C. 134(d) and 23 CFR 450.314(a) state the MPO, state DOT (Department of Transportation), and the public transportation operators shall cooperatively determine their mutual responsibilities in carrying out the metropolitan transportation planning process. These responsibilities shall be clearly identified in written agreements among the MPO, the State, and the public transportation operators serving the MPA.

4.2.2 Status

PAG has written planning agreements with ADOT, the Regional Transportation Authority and the regional public transportation provider, Sun Tran.

PAG was established in 1970 as a Council of Governments (COG) that serves as the regional planning and policy agency for the Tucson metropolitan area. In 1973, Governor Jack Williams designated PAG as the region's MPO. PAG consists of eight member agencies, including two tribal governments. PAG is governed by its Regional Council, comprised of elected officials or a designee from the agency's member jurisdictions.

In 2004, enabled by state legislation, PAG established the Regional Transportation Authority (RTA). The state legislation charged the RTA with developing a 20-year regional transportation plan along with a ½ cent sales tax to fund the roadway, transit, safety, environmental and economic vitality improvements contained in the plan. Both the plan and the sales tax were approved by Pima County voters in 2006. The \$2.1 billion RTA plan and the related sales tax that funds the RTA are currently set to expire in 2026. PAG indicated that an extension of the RTA sales tax beyond 2026, currently titled as "RTA Next," will be up for voter approval in the next several years.

4.2.3 Findings

The region is currently meeting the requirements of 23 USC 134(d) and 23 CFR 450.314(a).

4.3 Unified Planning Work Program

4.3.1 Regulatory Basis

23 CFR 450.308 sets the requirement that planning activities performed under Titles 23 and 49 U.S.C. be documented in a Unified Planning Work Program (UPWP). The MPO, in cooperation with the State and public transportation operator, shall develop a UPWP that includes a discussion of the planning priorities facing the MPA and the work proposed for the next one- or two-year period by major activity and task in sufficient detail to indicate the agency that will perform the work, the schedule for completing the work, the resulting products, the proposed funding, and sources of funds.

4.3.2 Status

The UPWP adheres to the state's fiscal year calendar which runs from July 1st – June 30th. This current document is the MPO's first UPWP that covers two fiscal years. This schedule adjustment in the UPWP cycle is reflective of a similar shift made by ADOT and Arizona remaining MPOs, all have adopted this approach of two fiscal years. FHWA approved the FY 2024-2025 UPWP in June 2023.

4.3.3 Findings

PAG is meeting the requirements of 23 CFR 450.308.

4.4 Regional Transportation Plan

4.4.1 Regulatory Basis

23 U.S.C. 134(c), (h) & (i) and 23 CFR 450.324 set forth requirements for the development and content of the Regional Transportation Plan (RTP). Among the requirements are that the RTP address at least a 20-year planning horizon and that it includes both long and short range strategies that lead to the development of an integrated and multi-modal system to facilitate the safe and efficient movement of people and goods in addressing current and future transportation demand.

The RTP is required to provide a continuing, cooperative, and comprehensive (3C) multimodal transportation planning process. The plan needs to consider all applicable issues related to the

transportation systems development, land use, employment, economic development, natural environment, and housing and community development.

23 CFR 450.324(c) requires the MPO to review and update the RTP at least every four years in air quality nonattainment and maintenance areas and at least every 5 years in attainment areas to reflect current and forecasted transportation, population, land use, employment, congestion, and economic conditions and trends.

Under 23 CFR 450.324(f), the RTP is required, at a minimum, to consider the following:

- Projected transportation demand
- Existing and proposed transportation facilities
- Operational and management strategies
- Congestion management process
- Capital investment and strategies to preserve transportation infrastructure and provide for multimodal capacity
- Design concept and design scope descriptions of proposed transportation facilities
- Potential environmental mitigation activities
- Pedestrian walkway and bicycle transportation facilities
- Transportation and transit enhancements
- A financial plan

4.4.2 Status

PAG's current multimodal Regional Transportation Plan, *2045 RMAP (Regional Mobility and Accessibility Plan)*, covers the region's long-range transportation plan until 2045. *2045 RMAP*, originally approved by PAG Regional Council on May 26, 2016, was updated in September 2020. FHWA and FTA issued its most recent conformity finding for the 2045 RMAP on January 20, 2021.

2045 RMAP contains more than 40 performance-based measurements and targets, in addition to the elements listed above, satisfying the requirements the Bipartisan Infrastructure Law. Transportation projects that receive funding through the MPO must be consistent with the plan.

PAG is developing the *2055 RMAP*, which will serve as the new Regional Transportation Plan. 2055 RMAP is scheduled for completion in 2026.

At the time of this report, PAG is updating demographic data, revenue assumptions, and updating its project list. The ultimate project list will depend on the success of the extension of the RTA beyond 2026, which will require voter approval in a future election.

Several public comments stated the PAG transportation planning process ignores non-motorized road users. Those comments are contained in Appendix E.

4.4.3 Findings

2045 RMAP is compliant with applicable Federal regulations.

Recommendation:

- The Federal team encourages PAG to ensure that regional transportation investments are multimodal, not favoring the movement of single-occupancy vehicles over alternative forms of transportation.

4.5 Transit Planning

4.5.1 Regulatory Basis

49 U.S.C. 5303 and 23 U.S.C. 134 require the transportation planning process in metropolitan areas to consider all modes of travel in the development of their plans and programs. Federal regulations cited in 23 CFR 450.314 state that the MPO in cooperation with the State and operators of publicly owned transit services shall be responsible for carrying out the transportation planning process.

4.5.2 Status

Tucson's regional transit network includes bus operations, paratransit services and a 3.9-mile long streetcar line.

2045 RMAP, the FY 2022-2026 TIP and the Regional Transportation Authority (RTA) plan have a strong multimodal focus. The current RTA plan includes \$534 million worth of regional transit investments for the period of 2006-2026. Short-range programming of major transit projects, including the purchase of new buses and vans, maintenance, equipment replacement, new transit stations and annual service operations are contained within the region's TIP. Since March 2020 due to the COVID-19 pandemic, the following transit services have been made free

to public and extended until December 2023: Sun Tran, Sun Link, Sun Van, Sun On Demand, Sun Express and Sun Shuttle.

Additionally, PAG/RTA has an active Transit Working Group that develops and maintains a Short-Range Transit Plan containing a five-year schedule of regional transit capital and operating expenditures, similar to the TIP.

4.5.3 Findings

The MPO is compliant with 49 USC 5303 and 23 USC 134.

Recommendation:

- PAG's transit performance measures should be made publicly accessible, including transit asset management and transit safety in the RTP and TIP development/update process.

4.6 Transportation Improvement Program

4.6.1 Regulatory Basis

23 U.S.C. 134(c),(h) & (j) set forth requirements for the MPO to cooperatively develop a Transportation Improvement Program (TIP). Under 23 CFR 450.326, the TIP must meet the following requirements:

- Must cover at least a four-year horizon and be updated at least every four years.
- Surface transportation projects funded under Title 23 U.S.C. or Title 49 U.S.C., except as noted in the regulations, are required to be included in the TIP.
- List project description, cost, funding source, and identification of the agency responsible for carrying out each project.
- Projects need to be consistent with the adopted RTP.
- Must be fiscally constrained.
- The MPO must provide all interested parties with a reasonable opportunity to comment on the proposed TIP.

4.6.2 Status

PAG's Fiscal Year (FY) 2022-2026 TIP was approved by the PAG Regional Council on May 27, 2021. FHWA issued a conformity finding FY 2022-2026 TIP on June 22, 2021. PAG is currently developing the FY 2024-2028 TIP. PAG expects the TIP to be finalized once there is greater certainty about the probability of the passage of the Tucson region's RTA Next initiative.

The federal team received several comments from members of PAG's Citizens Advisory Committee (CAC) and the City of Tucson citing a lack of transparency from PAG during the FY 2022-2026 TIP programming process. Those comments are contained within Appendix C.

4.6.3 Findings

The TIP is developed, maintained, and projects are selected in accordance with the requirements of 23 CFR 450.326, 328 and 332.

Recommendation: The federal team encourages PAG to review its processes to enhance coordination and transparency with committees and member agencies.

4.7 Public Participation

4.7.1 Regulatory Basis

Sections 134(i)(5), 134(j)(1)(B) of Title 23 and Section 5303(i)(5) and 5303(j)(1)(B) of Title 49, require a Metropolitan Planning Organization (MPO) to provide adequate opportunity for the public to participate in and comment on the products and planning processes of the MPO. The requirements for public involvement are detailed in 23 CFR 450.316(a) and (b), which require the MPO to develop and use a documented participation plan that includes explicit procedures and strategies to include the public and other interested parties in the transportation planning process.

Specific requirements include giving adequate and timely notice of opportunities to participate in or comment on transportation issues and processes, employing visualization techniques to describe metropolitan transportation plans and TIPs, making public information readily available in electronically accessible formats and means such as the world wide web, holding public meetings at convenient and accessible locations and times, demonstrating explicit consideration and response to public input, and periodically reviewing the effectiveness of the participation plan.

4.7.2 Status

PAG's Public Involvement Policy (PIP) was approved by the Regional Council in 2018. The 2018 document was an update to the PIP originally prepared in 1994. That policy was updated in 2006 to include all of PAG's planning and program areas. The plan was amended once again in 2012 to satisfy the FTA's public participation process for transit projects. PAG intends to update the current PIP in 2028. However, the MPO is prepared to update the PIP sooner should there be additional federal requirements concerning public involvement.

Due in part to the COVID-19 pandemic, PAG utilizes extensive virtual and hybrid tools to conduct public involvement, in addition to more traditional in-person meetings. The virtual public meeting options have resulted in greater attendance at meetings. For example, the FY 2022-2026 TIP virtual open house, held in April 2021, had 60 attendees versus an average of 18 at in-person open houses.

PAG's policy typically allows for a 30-day public comment period on draft plans, including the RTP and TIP. PAG uses its discretion in employing the PIP for activities that do not significantly affect the public or alter public policy.

PAG communicates information to the public via its website, email distribution, social media, documents, advertising, direct mail, news releases, focus groups and surveys, public meetings (including open houses, workshops and events), and comment forms. PAG uses a variety of visual techniques, including maps, photos and charts. As part of PAG's Title VI policy, the agency holds meetings in accessible locations and materials are provided in accessible formats and in languages other than English upon request.

PAG uses taglines in Spanish on agendas and documents. The MPO also has bilingual staff available at open house to translate shared information. For the 2055 RMAP update, PAG is administering public involvement surveys in English and Spanish, as well as ensuring that related webpages can be translated via Google options.

4.7.3 Findings

PAG is meeting the public involvement requirements of Sections 134(i)(5), 134(j)(1)(B) of Title 23 and Section 5303(i)(5) and 5303(j)(1)(B) of Title 49.

Recommendations:

- The Federal team encourages PAG to continue enhancing public involvement and engagement opportunities for citizen participation in the regional transportation planning process by updating its Public Involvement Policy to include Virtual Public Involvement strategies, as well as demonstrating adequate and timely consideration and response to public input.
- PAG's Public Involvement Policy should be updated within twelve months of this report to include Virtual Public Involvement strategies.

4.8 Civil Rights (Title VI, EJ, LEP, ADA)

4.8.1 Regulatory Basis

Title VI of the Civil Rights Act of 1964, prohibits discrimination based upon race, color, and national origin. Specifically, 42 U.S.C. 2000d states that "No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance." In addition to Title VI, there are other Nondiscrimination statutes that afford legal protection. These statutes include the following: Section 162 (a) of the Federal-Aid Highway Act of 1973 (23 U.S.C. 324), Age Discrimination Act of 1975, and Section 504 of the Rehabilitation Act of 1973/Americans with Disabilities Act (ADA) of 1990. ADA specifies that programs and activities funded with Federal dollars are prohibited from discrimination based on disability.

Executive Order #12898 (Environmental Justice) directs federal agencies to develop strategies to address disproportionately high and adverse human health or environmental effects of their programs on minority and low-income populations. In compliance with this Executive Order, USDOT and FHWA issued orders to establish policies and procedures for addressing environmental justice in minority and low-income populations. The planning regulations, at 23 CFR 450.316(a)(1)(vii), require that the needs of those "traditionally underserved" by existing transportation systems, such as low-income and/or minority households, be sought out and considered.

Executive Order # 13166 (Limited-English-Proficiency) requires agencies to ensure that limited English proficiency persons can meaningfully access the services provided consistent with and without unduly burdening the fundamental mission of each federal agency.

4.8.2 Status

PAG's current Title VI Implementation Plan was adopted by the Regional Council on May 24, 2018. The plan contains the agency's Title VI policy that reflects PAG's commitment to comply with the requirements of Title VI of the Civil Rights Act of 1964 and related federal statutes and regulations.

Staff within PAG periodically perform basic assessments to identify the location of protected Title VI and Environmental Justice (EJ) populations. PAG maintains online maps and data that display zip codes of Title VI/EJ populations. This information is used to ensure compliance with applicable Title VI provisions by demonstrating PAG's outreach efforts to these communities. During the development of the 2045 RMAP RTP, PAG staff performed analyses to measure the impact that proposed projects over the next 20-25 years will have on Title VI/EJ communities. Similar regional analyses are performed with each update of PAG's TIP. Additionally, project sponsors are required to ensure Title VI/EJ compliance as part of the planning and construction of individual projects.

PAG's Limited English Proficiency (LEP) plan identifies Spanish as the predominant language spoken by those in the PAG service area who identify as speaking English "less than very well." Spanish translations are made, without special request, for meeting notifications. Additional public information, including public meeting handouts, are translated upon request. Members of the public who call PAG and require over-the-phone Spanish interpretation can be directed to PAG staff who are proficient in Spanish.

4.8.3 Findings

PAG is compliant with Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000d, 23 U.S.C. 324, the Age Discrimination Act of 1975, Section 504 of the Rehabilitation Act of 1973/Americans with Disabilities Act of 1990, and other related provisions.

4.9 Consultation and Coordination

4.9.1 Regulatory Basis

23 U.S.C. 134(g and i)(5-6) and 23 CFR 450.316(b-e) set forth requirements for consultation in developing the RTP and TIP. Consultation is also addressed specifically in connection with the RTP in 23 CFR 450.324(g)(1-2) and in 23 CFR 450.324(f)(10) related to environmental mitigation.

In developing the RTP and TIP, the MPO shall, to the extent practicable, develop a documented process that outlines roles, responsibilities, and key decision points for consulting with other governments and agencies as described below:

- Agencies and officials responsible for other planning activities (State, local, economic development, environmental protection, airport operations, or freight)
- Other providers of transportation services
- Indian Tribal Government(s)
- Federal land management agencies

4.9.2 Status

PAG has a formal documented process that provides tribal governments and federal land management agencies participation in the development of the TIP, RTP, Congestion Management Plan (CMP), Title VI Analysis, air quality conformity analysis and public involvement. PAG's member agencies participate in the development and approval of these documents.

The Federal team received several comments that cited a lack of transparency and collaboration between PAG, member agencies, and subcommittees. Those comments can be found in Appendix C.

4.9.3 Findings

PAG fully meets the requirements of 23 CFR 450.316.

Recommendation:

- The federal team encourages PAG to review its processes to enhance coordination and transparency with committees and member agencies.

4.10 Air Quality

4.10.1 Regulatory Basis

42 U.S.C. 7401 and provisions under Titles 23 and 49 require the integration of air quality into the metropolitan transportation planning process, such that transportation investments support clean air goals. 23 CFR 450.324(m) requires that a conformity determination must be made on any updated or amended transportation plan in accordance with the Clean Air Act and associated EPA regulations.

4.10.2 Status

PAG is the designated air quality planning agency for Pima County. PAG, the Arizona Department of Environmental Quality (ADEQ), and the Pima County Department of Environmental Quality (PDEQ) communicate regular through PAG's environmental and transportation committees to coordinate their responsibilities in implementing the appropriate strategies to comply with the Clean Air Act of 1990. PAG maintains the regional air quality planning process, which includes the administration of an air quality subcommittee. This subcommittee provides information, coordination and advice on the priority air quality issues facing the region's stakeholders.

PAG, the Pima County Department of Environmental Air Quality (PDEQ), the Arizona Department of Environmental Quality (ADEQ), and ADOT work closely to ensure the Tucson Air Planning Area's (TAPA) compliance with National Ambient Air Quality Standards (NAAQS).

A maintenance plan for the Tucson carbon monoxide (CO) maintenance area was completed in 2020. Transportation conformity requirements no longer apply for CO. The TAPA is currently in attainment for ozone, at 0.069 parts per million (PPM), just below the federal standard of 0.070 PPM.

Two subareas within the TAPA are in maintenance and/or nonattainment for the PM10 pollutant. A revision to the State Implementation Plan (SIP) related to the Rillito PM10 non-attainment is under development. The Ajo PM10 maintenance was redesignated by the EPA in September 2020. Regional emissions analysis is not required after EPA's insignificance finding for motor vehicle emissions. However, project level conformity still applies. At the time of this report, a State Implementation Plan to address regional haze will require dust control measures for unpaved roadways that intersect with paved roads with annual average daily traffic volumes of or greater than 2700 vehicles.

4.10.3 Findings

PAG fully meets the requirements of 23 CFR.324(m), 42 U.S.C. 7401 and all related EPA provisions.

4.11 List of Obligated Projects

4.11.1 Regulatory Basis

23 U.S.C. 134(j)(7) and 23 CFR 450.334 requires that the State, the MPO, and public transportation operators cooperatively develop a listing of projects for which Federal funds under 23 U.S.C. or 49 U.S. C. Chapter 53 have been obligated in the previous year. The listing must include all federally funded projects authorized or revised to increase obligations in the preceding program year and, at a minimum, the following for each project:

- The amount of funds requested in the TIP
- Federal funding obligated during the preceding year
- Federal funding remaining and available for subsequent years
- Sufficient description to identify the project
- Identification of the agencies responsible for carrying out the project

4.11.2 Status

PAG includes the required information in the TIP for projects obligated in the previous fiscal year.

4.11.3 Findings

PAG fully meets the requirements of 23 CFR 450.334.

4.12 Freight Planning

4.12.1 Regulatory Basis

The MAP-21 surface transportation act established in 23 U.S.C. 167 a policy to improve the condition and performance of the national freight network and achieve goals related to economic competitiveness and efficiency; congestion; productivity; safety, security, and resilience of freight movement; infrastructure condition; use of advanced technology;

performance, innovation, competition, and accountability, while reducing environmental impacts.

In addition, 23 U.S.C. 134 and 23 CFR 450.306 specifically identify the need to address freight movement as part of the metropolitan transportation planning process.

4.12.2 Status

In 2017, the FAST Act established a National Highway Freight Network (NHFN) to direct federal resources and policies toward improved performance on the NHFN. The NHFN consists of the following four subsystems: 1) Primary Highway Freight System (PFHS); 2) portions of the Interstate system not on the PFHS; 3) Critical Rural Freight Corridors (CRFCs); and 4) Critical Urban Freight Corridors. PAG assisted ADOT in the identification of 103 miles of Critical Urban Freight Corridor mileage in the Tucson and Phoenix areas.

The PAG Regional Freight Plan was adopted in 2018. While there has been no update to the regional freight plan, PAG was an active participant in the update of 2021 update of the Arizona State Freight Plan.

4.12.3 Findings

PAG fully addresses the planning related freight requirements.

4.13 Environmental Mitigation/Planning Environmental Linkage

4.13.1 Regulatory Basis

23 U.S.C. 134(i)(2)(D) 23 CFR 450.324(f)(10) requires environmental mitigation be set forth in connection with the RTP. The RTP is required to include a discussion of types of potential environmental mitigation activities for the transportation improvements and potential areas to carry out these activities, including activities that may have the greatest potential to restore and maintain the environmental functions affected by the plan.

23 U.S.C. 168 and Appendix A to 23 CFR Part 450 provide for linking the transportation planning and the National Environmental Policy Act (NEPA) processes. A Planning and Environmental Linkages (PEL) study can incorporate the initial phases of NEPA through the consideration of natural, physical, and social effects, coordination with environmental resource agencies, and public involvement. This will allow the analysis in the PEL study to be referenced in the

subsequent NEPA document once the project is initiated, saving time and money with project implementation.

4.13.2 Status

The PAG long range transportation planning process is structured to make planning decisions and prepare planning products that are sensitive to environmental mitigation and resource conservation considerations. These activities are consistent with federal metropolitan transportation planning requirements for consultation with state and local agencies regarding inventories of natural or historic resources, as well as consultation with federal, state, tribal, wildlife, and regulatory agencies on potential environmental activities.

Within the 2045 RMAP update, PAG identified \$166 million to projects and strategies to address environmental stewardship. One of the goals of RMAP involves environmental stewardship, which is consistent with one of FHWA's ten planning factors, which calls for protecting and enhancing the environment.

4.13.3 Findings

PAG is in compliance with 23 USC 134(i)(2)(D) and 23 CFR 450.324(f)(10).

4.14 Transportation Safety

4.14.1 Regulatory Basis

23 U.S.C. 134(h)(1)(B) requires MPOs to consider safety as one of ten planning factors. As stated in 23 CFR 450.306(a)(2), the planning process needs to consider and implement projects, strategies, and services that will increase the safety of the transportation system for motorized and non-motorized users.

In addition, SAFETEA-LU established a core safety program called the Highway Safety Improvement Program (HSIP) (23 U.S.C. 148), which introduced a mandate for states to have Strategic Highway Safety Plans (SHSPs). 23 CFR 450.306 (d) requires the metropolitan transportation planning process should be consistent with the SHSP, and other transit safety and security planning.

4.14.2 Current Status

PAG has an active Transportation Systems Subcommittee that meets every other month on issues regarding transportation safety and operations. PAG addresses transportation safety extensively throughout its planning process. One of the goals of 2045 RMAP is ensuring the safety and security for all transportation users, which is aligned with one of USDOT's Planning Factors. This translates into transportation safety being examined from a multimodal perspective, including the safety of drivers, pedestrians, bicyclists, transit users, and freight movers. 2055 RMAP will continue a safety performance objective of reducing the number of roadway injuries and fatalities first identified in 2045 RMAP.

PAG utilizes its publicly accessible electronic Safety Explorer mapping tool as a visualization technique to display crash and injury related data at intersections around the region. The Safety Explorer is used by PAG staff for a variety of purposes, including performance metrics and informing transportation investment decisions. PAG will use this tool in the development of 2055 RMAP, which is an ongoing effort as of the completion of this report.

4.14.3 Findings

PAG is meeting the requirements of 23 CFR 450.306(a)(2) regarding safety.

4.15 Transportation Security Planning

4.15.1 Regulatory Basis

23 U.S.C. 134(h)(1)(C) requires MPOs to consider security as one of ten planning factors. As stated in 23 CFR 450.306(a)(3), the Metropolitan Transportation Planning process provides for consideration of security of the transportation system.

The regulations state that the degree and consideration of security should be based on the scale and complexity of many different local issues. Under 23 CFR 450.324(h), the MTP should include emergency relief and disaster preparedness plans and strategies and policies that support homeland security, as appropriate.

4.15.2 Current Status

The revised projects and strategies within the 2045 RMAP update continue to adhere to FHWA's ten planning factors, which include increasing the security of the transportation system

for motorized and non-motorized users. The projects and strategies within 2055 RMAP will continue to align with applicable planning factors.

PAG staff, along with transportation and emergency services staff from member agencies continue to participate in security planning and preparation activities, including:

- the State of Arizona Emergency Response and Recovery Plan (updated 2017)
- Pima County Emergency Operations Plan (updated in 2021)
- the Pima County Multi-Jurisdictional Hazard Mitigation Plan (updated in November 2022).

4.15.3 Findings

PAG is meeting the requirements of 23 CFR 450.306(a)(3)&(9).

4.16 Nonmotorized Planning/Livability

4.16.1 Regulatory Basis

23 U.S.C. 217(g) states that bicyclists and pedestrians shall be given due consideration in the comprehensive transportation plans developed by each MPO under 23 U.S.C. 134. Bicycle transportation facilities and pedestrian walkways shall be considered, where appropriate, in conjunction with all new construction and reconstruction of transportation facilities.

23 CFR 450.306 sets forth the requirement that the scope of the metropolitan planning process "will increase the safety for motorized and non-motorized users; increase the security of the transportation system for motorized and non-motorized users; and protect and enhance the environment, promote energy conservation, improve the quality of life.

4.16.2 Current Status

The Tucson area was the first region of the country to be designated as gold-level bicycle friendly by the League of American Bicyclists. PAG continues to engage in extensive planning for nonmotorized users of its transportation system. The RTA referendum, approved by voters in 2006, has resulted in the construction of nearly 400 miles of bike lanes in the Tucson region, nearly 80 pedestrian crossings, and 179 miles of new sidewalks.

The 2045 RMAP updated, completed in 2020, contains projects that will result in the construction of 360 miles of new bicycle and pedestrian facilities, representing an estimated investment of over \$600 million by 2045.

PAG maintains several publicly accessible bicycle and pedestrian related visualization tools on its website. This includes a listing of bike shops and rental locations throughout the region, printable and interactive regional bike maps, and links to jurisdictional cycling resources. Additionally, PAG conducts annual bicycle and pedestrian counts at numerous intersections. PAG maintains a Pedestrian Data Explorer, which provides a map of bicycle and pedestrian counts, as well as information about age and observed direction.

The 2055 RMAP will continue to address FHWA's ten planning factors, including those related to livability principles:

- Increasing the safety and security of the transportation system for motorized and non-motorized users
- Increasing accessibility and mobility of people and freight
- Enhancing the integration and connectivity of the transportation system, across and between modes, for people and freight

4.16.3 Findings

PAG meets the requirements of 23 USC 217(g) and 23 CFR 450.306. Several public comments stated the PAG transportation planning process ignores non-motorized road users. Those comments are contained in Appendix C.

Recommendation:

- PAG should consult with ADOT in the development of Arizona's Vulnerable Road User Safety Assessment. 23 USC 148(1)(4)(B) requires states to consult with local governments and metropolitan planning organizations (MPOs), and regional transportation planning organizations that represent a high-risk area for vulnerable road users (bicyclists, pedestrians, etc.).
- The Federal team encourages PAG to ensure that regional transportation investments are multimodal, not favoring the movement of single-occupancy vehicles over alternative forms of transportation.

4.17 Integration of Land Use and Transportation

4.17.1 Regulatory Basis

23 U.S.C. 134 encourages MPOs to consult with officials responsible for other types of planning activities that are affected by transportation in the area (including State and local planned growth, economic development, environmental protection, airport operations, and freight movements) or to coordinate its planning process, to the maximum extent practicable, with such planning activities.

4.17.2 Current Status

PAG utilizes an activity based model CT-RAMP, to develop land use and population scenarios for the Tucson region. The integration of land use and transportation planning is interwoven throughout the 2045 RMAP updated plan, including freight and logistics as well as environmental considerations. Member jurisdictions maintain state-mandated, voter approved general plans. General plans serve as comprehensive land use plans that guide future growth within a jurisdiction. PAG works with member jurisdictions to ensure that transportation decisions are in line with jurisdictional land use goals and objectives.

4.17.3 Findings

PAG meets the requirements of 23 U.S.C. 134 and 23 CFR 450.306(a)(5).

4.18 Travel Demand Forecasting

4.18.1 Regulatory Basis

23 CFR 450.324(f)(1) requires that the Metropolitan Transportation Plan include the projected transportation demand of persons and goods in the metropolitan planning area over the period of the transportation plan. Travel demand forecasting models are used in the planning process to identify deficiencies in future year transportation systems and evaluate the impacts of alternative transportation investments. In air quality non-attainment and maintenance areas, they are also used to estimate regional vehicle activity for use in mobile source emission models that support air quality conformity determinations.

4.18.2 Current Status

PAG utilizes several population, employment, travel and traffic data sources for travel demand modeling purposes. PAG gathers information from the Census, Pima County Assessor's office, Arizona Office of Economic Opportunity (AOEO), in addition to building permits for population forecasting. Employment data is collected from the University of Arizona's Economic and Business Research Center (EBRC), a countywide employment database that PAG developed in partnership with the Maricopa Association of Governments (MAG), in addition to general commercial, administrative, parcel, and Google data.

PAG uses an activity-based model (ABM) that was developed in 2019, Coordinated Travel Regional Activity-Based Modeling Platform (CT-RAMP). PAG conducted the first peer review of CT-RAMP in 2020, with eleven national ABM practitioners providing input, including FHWA, ADOT, the Maricopa Association of Governments, and Arizona State University. PAG is seeking to host another peer exchange to reflect the development of telework, airport, and freight sub-models and sensitivity analyses, as well as to follow up on recommendations from the 2020 peer exchange.

PAG is considering the development of a regional household travel survey to better understand regional travel behavior and improve the ABM.

4.18.3 Findings

PAG is meeting the requirements of 23 CFR 450.324(f)(1) as they pertain to travel demand forecasting.

4.19 Congestion Management Process

4.19.1 Regulatory Basis

23 U.S.C. 134(k)(3) and 23 CFR 450.322 set forth requirements for the Congestion Management Process (CMP) in TMAs. The CMP is a systematic approach for managing congestion through a process that provides for a safe and effective integrated management and operation of the multimodal transportation system. TMAs designated as non-attainment for ozone must also provide an analysis of the need for additional capacity for a proposed improvement over travel demand reduction, and operational management strategies.

4.19.2 Current Status

PAG was one of the first MPOs to implement a Congestion Management Process. PAG's CMP is interwoven throughout the agency's RMAP and TIP. A CMP checklist is required for all TIP project applications to gauge whether a proposed project is in line with CMP strategies. To measure recurring congestion, PAG utilizes its Regional Synchro Model which uses turning movement data for peak-hour traffic congestion estimates and identifies signalized intersections on the arterial network. PAG uses its traffic forecasting model to monitor regional traffic conditions and the potential impacts of proposed TIP and RMAP projects on regional congestion. PAG utilizes INRIX data provided by ADOT to refine forecast models and its calculation of performance measures. To measure non-recurring congestion, PAG uses Tucson's regional traveler information source, Transview, collecting and logging traffic incidents and construction projects.

PAG has established four congestion related performance measures with 2045 targets within the current 2045 RMAP. Progress toward achieving those targets is reported in updates to the TIP and RMAP. With the FAST Act, PAG opted to adopted statewide congestion performance targets.

PAG plans continue to improve CMP related strategies, including refining the agency's TIP project selection criteria, implementing new strategies to measure non-recurring congestion, and assessing the role of Dynamic Traffic Assignment modeling in the execution of the CMP.

4.19.3 Findings

PAG's CMP addendum meets all requirements under 23 USC 134(k)(3) and 23 CFR 450.322.

4.20 Performance Management

4.20.1 Regulatory Basis

The Bipartisan Infrastructure Law, signed into law November 15, 2021, continues the cooperative, continuous, and comprehensive framework for making transportation investment decisions in metropolitan areas, jointly overseen by the FHWA/FTA, via § 1201 and 23 USC § 134.

The following citations pertain to requirements for MPOs under performance management:

23 CFR 450.306(d)(2) states that each MPO shall establish performance targets that address the performance measurements and standards established under 23 CFR part 490 (where applicable), 49 U.S.C. 5326(c), and 49 U.S.C. 5329(d) to use in tracking progress toward attainment of critical outcomes for the metropolitan transportation organization. The Bipartisan Infrastructure Law also continues all metropolitan planning requirements in effect under MAP-21 and the FAST Act.

The selection of targets that address performance measures described in 23 U.S.C. 150(c) shall be in accordance with the appropriate target setting framework established in 23 CFR part 490, and shall be coordinated with the relevant state(s) to ensure consistency, to the maximum extent practicable.

The selection of performance targets that address performance measures described in 49 U.S.C. 5326(c) and 49 U.S.C. 5329(d) shall be coordinated, to the maximum extent practicable, with public transportation providers to ensure consistency with performance targets that public transportation providers establish under 49 U.S.C. 5326(c) and 49 U.S.C. 5329(d).

23 CFR 450.306(d)(3) states that each MPO shall set performance targets not later than 180 days after the State or public transportation provider establishes performance targets under the national stated goals.

23 CFR 450.324(d)(4) states that MPO shall integrate into the metropolitan transportation planning process, directly, or by reference, the goals, objectives, performance measures, and targets described in other State transportation plans and transportation processes, as well as any plans developed under 49 U.S.C. chapter 53 by providers of public transportation, required as part of a performance-based transportation planning program, including:

- The State asset management plan for the National Highway System (NHS), as defined in 23 U.S.C. 119(e) and Transit Asset Management Plan (TAMP), as discussed in 49 U.S.C. 5326;
- Applicable portions of the Highway Safety Improvement Program (HSIP), including the Strategic Highway Safety Plan (SHSP), as specified in 23 U.S.C. 148
- The Public Transportation Agency Safety Plan (PTASP) in 49 U.S.C. 5329(d)
- Other safety and security planning and review processes, plans, and programs, as appropriate
- The Congestion Mitigation and Air Quality Improvement Program performance plan in 23 U.S.C. 149(l), as applicable
- Appropriate (metropolitan) portions of the State Freight Plan (MAP-21 Section 1118)
- The congestion management process, as defined by 23 CFR 450.322, if applicable

- Other State transportation plans and transportation process required as part of performance-based program.

23 CFR 450.324(f)(3) and (4) outline requirements to the LRTP. The MPO LRTP shall include:

- a description of the (Federally required) performance measures and performance targets used in assessing the performance of the transportation system.
- a system performance report evaluating the condition and performance of the transportation system with respect to the (Federally required) performance targets including progress achieved by the MPO towards the performance targets.

23 CFR 450.218(q) and 23 CFR 450.326(d) require that, to the maximum extent practicable, a description of the anticipated effect of the TIP toward achieving the performance targets identified by the MPO in the LRTP. TIPs shall link investment priorities to achievement of performance targets in the plan.

23 CFR 450.314(h) requires that the MPO, State, and providers of public transportation shall jointly agree upon and develop specific written provisions for cooperatively developing and sharing information related to:

- transportation performance data
- the selection of performance targets
- the reporting of performance targets
- the reporting of performance to be used in tracking progress toward attainment of critical outcomes for the region of the MPO (see 450.306(d)) and the collection of data for the State asset management plan for the NHS

4.20.2 Current Status

PAG remains compliant with federal regulations that have guided the development of performance measurements. PAG utilizes performance metrics in its planning process to monitor the impact that regional transportation investment decisions have toward achieving regional transportation goals. PAG's performance measures fall within seven categories:

- System maintenance – bridge and pavement condition
- Transportation safety – crash severity and frequency
- System performance – congestion and travel times
- Multi-modal choices – transit, bike, and walk commutes
- Environmental stewardship – air quality and vehicle emissions
- Freight and economic growth – freight share and reliability

- Land use and transportation – employment and housing accessibility

These seven categories align with most of the seven national performance metric categories:

- Safety
- Infrastructure
- Congestion reduction
- System reliability
- Freight movement and economic vitality
- Environmental sustainability
- Reduced project delivery delays

PAG has developed several notable tools to assist staff, member jurisdictions and the public with monitoring the region's progress toward achieving and/or maintaining performance goals. The goals are contained throughout PAG's planning documents, including the TIP, RTP and Congestion Management Process (CMP). PAG has also established numerous short and long-term performance objectives to assist in achieving and/or maintaining these goals. PAG developed and utilizes an interactive, online data dashboard that contains real-time information on the current performance of the transportation system, trend information, and performance targets. The tool allows users to access background information on the rationale behind the performance metric, the importance of the metric to the region, and how the metric is incorporated into the large performance-based planning picture. The dashboard contains additional information about whether the performance metric is tied to a federal Infrastructure Investment and Jobs Act requirement, the data source for the metric, and the frequency at which the metric's data is updated.

This tool allows the user to access information including crash data, pavement condition, interaction with riparian areas, freight reliability and presence of sidewalks. This information assists PAG member jurisdictions in developing proposals of projects to be programmed in the TIP. The data also ensures that PAG can make more informed decisions about project prioritization related to achieving regional performance goals. Once a project has been completed, PAG can monitor the impact that the project has had toward achieving regional performance targets. In addition to displaying the performance of the transportation network within the PAG region, the tool also has a Project Explorer that captures the performance of roadway segments and intersections projects that have been programmed into PAG's TIP.

4.20.3 Findings

PAG is following all Bipartisan Infrastructure Act performance requirements under 23 CFR 450.

Commendation:

- PAG continues to utilize its online performance-based Transportation Network Data Portal (TNDP) to assist member agencies with transportation investment decisions. The tool houses GIS-based mapping capabilities that display performance metrics including pavement condition, safety-related data, and traffic volumes throughout the Tucson metropolitan area.
- PAG continues to utilize its performance based planning strategies for regional planning decisions. The MPO maintains roughly 50 performance measures to guide investment decisions in a variety of areas including safety, pavement condition and travel times.

Recommendation:

- The Federal team encourages PAG to ensure that regional transportation investments are multimodal, not favoring the movement of single-occupancy vehicles over alternative forms of transportation.

5.0 CONCLUSION, CORRECTIVE ACTION, COMMENDATIONS, AND RECOMMENDATIONS

The federal review team found the review to be very productive and would like to thank PAG and its partners for their cooperation. Based on our review and understanding of the transportation planning process in the PAG transportation planning area, we have noted strengths through listing commendations in Section 5.1 below, made several recommendations for improvements, and issued no corrective actions. As stated in Section 1.2, it is important to note that the recommendations listed in this report are areas where the federal review team sees room for improvement, but do not indicate deficiencies in the MPO's planning process.

5.1 Conclusion

FHWA and FTA hereby jointly certify that the metropolitan transportation planning process, as carried out by PAG, meets the requirements of 23 CFR 450 and 49 CFR 613. As mentioned in the executive summary, PAG was notified in advance of this written report on April 18, 2023 that they had been certified by FHWA and FTA.

The FHWA and FTA review found that the metropolitan transportation planning process conducted in the PAG urbanized area meets Federal planning requirements. We offer the following for your consideration.

5.2 Corrective Actions

There are no corrective actions identified during this review.

5.3 Commendations

The following are noteworthy practices that the Pima Association of Governments is doing well in the transportation planning process:

- PAG continues to utilize its online performance-based Transportation Network Data Portal (TNDP) to assist member agencies with transportation investment decisions. The tool houses GIS-based mapping capabilities that display performance metrics including pavement condition, safety-related data, and traffic volumes throughout the Tucson metropolitan area. (See Section 4.20 – Performance Management)
- PAG continues to utilize its performance-based planning strategies for regional planning decisions. The MPO maintains roughly 50 performance measures to guide investment decisions in a variety of areas including safety, pavement condition and travel times. (See Section 4.20 – Performance Management)

5.4 Recommendations

The following are recommendations to encourage PAG to strengthen its transportation planning process:

- The federal team encourages PAG to ensure that regional transportation investments are multimodal, not favoring the movement of single-occupancy vehicles over alternative forms of transportation. (See Section 4.4 – Regional Transportation Plan and 4.16 – Non-Motorized Planning/Livability)
- PAG’s transit performance measures should be made publicly accessible, including transit asset management and transit safety in the RTP and TIP development/update process. (See Section 4.5 – Transit Planning)
- The Federal team encourages PAG to continue enhancing public involvement and engagement opportunities for citizen participation in the regional transportation planning process by updating its Public Involvement Policy to include Virtual Public Involvement strategies, as well as demonstrating adequate and timely consideration and response to public input. (See Section 4.7 – Public Participation)
- The federal team encourages PAG to review its processes to enhance coordination and transparency with committees and member agencies. (See Section 4.9 – Consultation and Coordination)
- PAG should consult with ADOT in the development of Arizona’s Vulnerable Road User Safety Assessment. 23 USC 148(1)(4)(B) requires states to consult with local governments and metropolitan planning organizations (MPOs), and regional transportation planning organizations that represent a high-risk area for vulnerable road users (bicyclists, pedestrians, etc.). (See Section 4.16 – Non-Motorized Planning/Livability)

APPENDIX A - PARTICIPANTS

The following individuals were involved in the PAG planning certification on-site review:

FHWA Arizona:

- Anthony Sarhan, Deputy Division Administrator
- Alan Hansen, Planning, Environment, Air Quality, Right-of-Way, Civil Rights Team Leader
- Romare Truely, Senior Transportation Planner

FTA Region 9:

- Arianna Valle, General Engineer
- Samuel Diaz, Community Planner

Pima Association of Governments

- Farhad Moghimi, Executive Director
- Dave Atler, Deputy Director
- Jeanette DeRenne, Transportation Planning Director
- Jamison Brown, Strategic Planning, Programming and Policy Director
- Sheila Storm, Communications Director
- Hyunsoo Noh, PhD., Modeling Coordinator
- Paki Rico, Community Affairs Administrator
- Mary Carter, Director of Partnerships and Development
- Peter Krawczak, Senior Application Developer
- David Mitchell, Senior Transportation Planner
- David Zynda, Program and Policy Coordinator
- Dustin Fitzpatrick, Air Quality Planning Coordinator

Arizona Department of Transportation

- Clemenc Ligocki, Planning and Program Manager
- Jill Dusenberry, Transit Group Manager
- Mark Hoffman, Regional Transportation Planner
- Angela Estrada, Financial Specialist

APPENDIX B - STATUS OF FINDINGS FROM LAST REVIEW

One of the priorities of each certification review is assessing how well the planning partners in the area have addressed corrective actions and recommendations from the previous certification review. This section identifies the corrective actions and recommendations from the previous certification report, which was finalized in 2019, and summarizes discussions of how they have been addressed.

Recommendation 1: PAG has used Census block group data to more effectively target specific demographic groups for public census outreach. The federal team encourages PAG to continue using census block data group data in other outreach efforts.

Disposition: PAG continues to employ number tools and techniques to expand public outreach. PAG uses in house and sociodemographic information to solicit participation from a variety of groups, including limited-English population (LEP) and low income residents.

Recommendation 2: The federal team encourages PAG to continue to explore methods that may help in engagement of additional citizens on its task force to better reflect the region's demographics.

Disposition: PAG continues to expand citizen engagement activities. PAG does not track the demographic information of citizens task forces. PAG encourages citizen participation through extensive outreach activities.

Recommendation 3: PAG should amend its complaint section in its 2020 Title VI Plan update to send all complaint to ADOT versus investigating complaints in house.

Disposition: PAG amended its 2020 Title VI Plan to ensure all civil rights complaints are sent to ADOT. PAG has not received any complaints since the federal team's 2019 certification review.

APPENDIX C – PUBLIC COMMENTS

The section has been revised to account for two additional comments the federal team received during the public input period. The federal team received 21 comments from 20 individuals. Some comments have been redacted to remove e-mail exchanges, comments outside of the scope of the transportation planning process, and other personal information.

The federal team has determined that the addition of Comment #20 and Comment #21 do not warrant revisions to any other section of this report.

Comment 1:

PAG ignores induced demand and sprawl created by road widening and expects Tucsonans to suffer the consequences of an ever increasing number of larger and larger vehicles driving into and out of our city, leaving pollution and tire particulate and killing more and more cyclists and pedestrians annually. PAG expects Tucsonans to subsidize the lifestyle excesses of their regional neighbors who over and over again choose to form their own school districts in their distant, wealthier enclaves so that they have no responsibility to contribute towards TUSD all while depending on Tucson for their jobs.

PAG and the RTA have hijacked resources that are supposed to serve the majority of residents in the Santa Cruz Valley but are serving a small portion of the wealthier segment of residents instead.

The formation of its suburbs destroyed Tucson's economy. Tucson needs proportional representation on the RTA and leadership who embody the goal of decreasing economic segregation.

Tucson needs to be able to protect its subset of residents who responsibly choose to walk and bike to the destinations. It's impossible to protect vulnerable road users while allowing drivers in and out of the city at high speeds.

If Pima County residents want to work in Tucson and live tens of miles away, let them pay the outsized portion of the infrastructure costs these choices necessitate. Let them install rail lines that connect their wealthier suburb with the City they rely on and leave their cars out of our city.

Tucson needs to invest in alternative transit options, reduce its overall amount of road surface dramatically. It can not do so while catering to the convenience of greater Pima County residents.

I have been hit by cars twice while biking in Tucson, while obeying traffic laws, because our streets prioritize car flow volume and speed over every other use and over safety. I regularly see handicapped neighbors in extremely dangerous situations in Tucson streets because Tucson can't afford to bring all its pre-ADA streets up to usable standards. Why? It wastes billions maintaining excessive amounts of streets surfaces per capita so that its suburbanites can drive in and out at low costs to them.

PAG has not been effective at governance for the region and shouldn't continue to be certified.

Comment 2:

It is absolutely imperative for the future of Tucson to invest in tracking the climate crisis, transitioning to clean energy, and finding solutions for equitable and accessible transportation. Our city needs funding to adapt to our growing city and changing climate, while focusing on safety for cyclists and pedestrians.

Comment 3:

I am a resident of Tucson, AZ 85716 and I would like to tell you how critical rail and bus routes and improved bike lanes street crossings are to me and my community members. By improving the roads for pedestrian traffic you are helping clean energy, traffic reduction and lifting up equity for all citizens of Tucson. Please give us the chance to get people walking and biking and busing to concerts, sporting events and museums.

Comment 4:

Thank you for the opportunity to provide comments regarding the recertification of the Pima Association of Governments/Regional Transportation Authority. I request that you promptly acknowledge receipt of this email.

I have been affiliated with this MPO since 1978, first as an employee, and then as a member of various committees, and also as a retained consultant on many projects.

Even though this is a very serious issue, I'll keep this brief. My primary comment today deals with PAG's refusal to fill requests for public information. This is evidence of an intentional lack of transparency fostered by PAG administration. PAG claims immunity from public records laws due to PAG being a government funded nonprofit organization. As a recent example, PAG refused to provide any information about the recertification process to me, and instead referred me to your office when it clearly had the information being requested. Indeed, the Public Notice regarding recertification was apparently not published and not even placed on the PAG/RTA website. Despite the remarks on page 30 of your September 4, 2019 PAG certification report, the recertification process is a well kept secret here, at least from a public stakeholder perspective.

As a current member of a PAG/ RTA Committee and a frequent media editorial contributor, I often need information not accessible on the PAG/RTA website. Formal requests for routine public information by me and others are routinely denied by PAG. Such denial has compelled me to file complaints with State officials, and to try to obtain the requested information using workaround strategies.

Although PAG is a 501(c)(4) nonprofit according to the IRS, it is fully funded with public revenue, all its member jurisdictions are subject to public records laws, PAG employees are members of a public retirement system, and the federal government itself considers PAG a public entity. It would seem prudent for PAG to comply with public records laws for the sake of transparency, just as the Maricopa Association of Governments (also a 501(c)(4)) and others have done. Interestingly, I've had to obtain information related to PAG from MAG, after PAG denied my information request. Something is clearly wrong with this situation.

My recommendation regarding recertification is simply this: In the light of CCC mandates, PAG needs to strive for transparency rather than practice self-destructive opaqueness. A crucial step is to be forthcoming with public information and to comply willingly and consistently with public records laws.

If you would like information to support any of my comments herein, I'd be happy to provide to provide extensive documents and citations to you.

Comment 5:

I am writing to submit my comments opposing the Pima Association of Government's (PAG) recertification as a Metropolitan Planning Organization (MPO) without some level of oversight and reform. My opinions are my own, but they are informed by my time spent as a volunteer in

the Regional Transportation Authority plan development, and my work within Pima County at the Department of Environmental Quality.

The Regional Transportation Authority is tasked with developing long range regional transportation plans. I have been a volunteer on the Citizens Advisory Committee (CAC) since January 2022. I applied to serve on the CAC in August 2021, and just did not hear anything back until December 2021 when I was appointed. My time with the CAC has revealed that PAG staff has no interest in a community-driven process, transparency, or accountability.

I apologize that my list of complaints seems petty, but they must all be written out to show that none of these individual issues is a one-off.

The CAC meetings are held at a time determined long before the current membership, during the middle of the working day. This may have worked for the previous volunteer cohort, which was predominantly people of retirement age, but it does not work for the younger working crew. There have been numerous requests to revisit the meeting time, all ignored. Meetings are now twice monthly, for 2-3 hours, during the work day.

PAG staff has consistently misinterpreted transparency laws to stifle conversation and make vague legal threats against CAC members. I imagine I will receive another letter threatening me with some sort of disciplinary action for submitting this email. PAG's interpretation of the state's various open meeting laws is wildly inaccurate and counter to the purpose of the laws. Various uses of PAG's magic lawyering have included: advising us that we cannot email agenda items for future meetings to meeting chairs, because that would be something done outside the public eye; but we similarly cannot suggest new agenda items in meetings, because the new agenda items themselves are not in the agenda; we cannot reply-all to the CAC membership list to share one-way informational items, such as publicly available webinars on the topic of transportation, or tours of new bus routes. I'm a lawyer, and they have been quick to tell me that I cannot share the actual statutes that they are misinterpreting. PAG's own lawyer is nowhere to be seen when PAG staff is interpreting law, although we did receive a memorandum from him stating that we are bound by PAG's interpretation of the law. This is quite simply not how law works.

While we have been told not to share information, PAG's director Farhad Moghimi has engaged in blatant behind the scenes communication in an effort to overturn popular votes by the CAC. Another CAC member submitted a Public Records Request that revealed emails between Mr. Moghimi and two regional council members, in which he fed them the exact lines they later used in memoranda chastising the CAC not to consider policy. In an email dated August 4, 2022, Farhad Moghimi wrote to Ed Honea, the mayor of member jurisdiction Marana, "Per our

conversation here is a the list of concerns we discussed the other day." He then wrote a list explicitly aimed at countering the CAC's unanimously adopted Guiding Principles. That list from Mr. Moghimi's email ended up in a letter sent to CAC members from Mr. Honea. I did not attach these documents to this email because I was concerned the email would not go through, but I have them and can do so if requested. The public records request had to go through the other jurisdictions' offices, because public records requests to PAG go through Mr. Moghimi.

PAG's inverted interpretations of laws have been used to attempt to discipline various volunteer members of its committees, as well as former PAG employees. I was one of 3 members of the CAC who received a disciplinary notice in December 2022 for alleged violations of open meeting laws and various internal codes of conduct. A member of another volunteer oversight committee, a former PAG employee, also received such a letter at the same time. Recently, other former PAG employees have received letters threatening them with disciplinary action if they violate vague PAG codes of conduct.

I can no longer keep track of how many times PAG staff have misconstrued the CAC's recommendations to the other interconnected governing bodies, and vice versa. Most recently, the RTA Board was led to believe that the CAC had ranked a list of projects in order of prioritization, and so the RTA Board cut the lowest listed projects in order to save money, a perfectly sensible action. The CAC had not ranked those projects by priority. PAG staff that was present at that meeting knew that.

I have no hope that the current leadership of PAG will allow a community-driven, data-driven, thoughtful transportation plan. This is a pity, because this region has already conducted multiple studies and projections for plans that will serve the region's transportation needs in the face of growing inequity and climate crisis.

In my non-volunteer life, I now work in the air regulatory agency for Pima County. We regulate stationary sources, and PAG regulates mobile sources. PAG has been less than forthcoming about any of the work that it is doing on this, including a recent Carbon Reduction Grant. PAG staff, led by Mr. Moghimi, continue to prioritize private vehicle use in the RTA Next planning, so it does not make them an obvious partner in cutting emissions across the board.

I do not know what the alternative would be to having PAG serve as our region's MPO. PAG certainly has some excellent staff and resources, but so long as Mr. Moghimi is in charge they will not be able to do meaningful, community-centered, transparent work.

I am available to answer additional questions or send any of the documents I referenced in this email.

Comment 6:

I'm writing in response to a request for input from the public, which includes me. I am a resident of the City of Tucson. The PAGMPO affects me through the Regional Transportation Authority (RTA). I am not involved at all. I would like to be, but information is hard to come by. I don't know how to be involved and I do not think my input will be considered. While I'll accept most blame for this situation, I do believe PAG has not made it easy for me to be involved.

In addition, consider the fact that citizens of Tucson comprise roughly half the citizens of the metropolitan area yet have only one vote on the ten member RTA commission. This is unacceptable to me. I do not believe the decisions made by the RTA are in my best interest. Soon we will be asked to reauthorize RTA for another 20 years. As things stand now, I will be voting no.

Comment 7:

It is important to acknowledge and appreciate the invaluable work of the Pima Association of Governments (PAG) in regional transportation planning. PAG's dedication to creating transportation solutions that cater to the changing demographics of our community is admirable and essential to address local needs. With federal, state, regional, and local funding, PAG has made significant improvements to our transportation options, ranging from the implementation of bike lanes and pedestrian-friendly infrastructure to innovative public transit solutions.

As the newly elected Vice-Chair of the PAG Regional Council, I can attest to the fact that PAG is committed to collaborative approaches to addressing our regional challenges. Unfortunately, like in many other communities, the needs are great and resources are becoming increasingly limited. However, we have not and will not allow these challenges to hinder our collective efforts to work together with civility and respect towards the greater good.

PAG's team is admirable in its dedication to community outreach and engagement, working ceaselessly to keep us informed. We cannot overemphasize the importance of the Regional Council's collaboration in addressing transportation challenges. Our efforts to leverage new funding sources such as the RTA sales tax for transportation infrastructure benefit our community in countless ways. PAG staff does necessary work in support of the Regional Council's efforts.

As we look towards the future of transportation in our region, all the jurisdictions that make up the Regional Council must continue to work hand-in-hand with each other. We extend our sincere gratitude to our partners at PAG for their vital work in advancing regional transportation solutions. Anything that we do together that is good and sustainable will be supported by their efforts.

Please contact me if you have questions, or needs for additional information.

Comment 8:

I would like to take this opportunity to comment on the 2023 certification review of Pima Association of Governments (PAG) scheduled for April 18, 2023.

Specifically, as an older female former PAG employee who recently retired, I would like to address what I would describe as a toxic work atmosphere at PAG and which is impacting staff's ability to produce exceptional work. For example, the very recent departure of five of the best and brightest deputy directors, directors and coordinators has left a gap of over 70 years of incredible knowledge, leaving the agency devoid of institutional knowledge as well as pride and hope.

These departures are a direct result of how the executive director, Farhad Moghimi, operates and his insistence on always having the last and most times only word on ideas and projects and how he stifles staff's professional input and creativity. Morale has become so bad that recently morale boosting "best team ever" posters have been placed all over PAG's walls - as if this would help.

I write to you because I believe the atmosphere will affect the certification process and PAG's ability to carry out its part in this process. PAG is no longer the trusted agency where jurisdictions and public stakeholders came to be led through a process of consensus based on decision making. It has become an agency known for imposing its will and forcing a process where the public and jurisdictional technical staff have little to no say in decisions and policies that are made and issued unilaterally without awareness, discussion or buy-in by the Regional Council itself.

As I write, I have filed official charges against PAG for discrimination and retaliation and would not have retired at this time had PAG not become such a difficult place to work due to upper management.

PAG staff have always been dedicated and knowledgeable but the turnover has been enormous recently - 65% turnover just in the past five years alone. This seems likely to affect both current and future projects as well as undermine the very purpose of the MPO, to ensure regional cooperation and planning. PAG is no longer known for those things and it is damaging the region and the long standing legacy of one of the most effective medium sized MPO's in the country. Talented workers are leaving or avoiding the agency as it is no longer a place for collaboration, innovation and service.

I believe it would behoove you to interview current and former PAG staff at various levels, from directors on down in an attempt to validate why PAG has seen so many valuable employees depart over the past years. It would also be helpful to determine whether the agency is fulfilling its core functions of establishing and managing a fair and impartial setting for effective regional decision-making, evaluating and providing transportation alternatives as options for transportation investment, and equitably involving the general public in the planning process.

Thank you.

Comment 9:

As a 53-year-old nonprofit focused on sustainability issues, Arizona Forward is appreciative of the opportunity to comment on the regional transportation planning efforts of the Pima Association of Governments (PAG).

We appreciate the regional transportation planning work of Pima Association of Governments as a federally required metropolitan planning organization and its programming of federal, state, regional and local dollars to improve our regional transportation network. These improvements are important to the ongoing changes in our demographics to provide a variety of transportation options to meet the needs of everyone.

As a stakeholder in Arizona, we are very aware that PAG continues to work as a collaborative organization with its member jurisdictions and its transportation stakeholders. The ability to work together to address regional solutions is a long-standing tradition of Pima Association of Governments.

Arizona Forward fully understands that transportation dollars are limited to address the state and region's transportation demands. We value PAG's work in trying to leverage new dollars in collaboration with its members and others as well. Arizona Forward is also committed to achieving mobility solutions and we realize that we need to build consensus with metro and

rural areas and provide community outreach to educate the public about the benefits of current and future alternative mobility solutions.

At Arizona Forward, we realize that achieving better transportation systems and cleaner air requires education, technology advancements and transportation policies and planning changes. It all depends on a concerted effort to work toward the greater good through solutions and their widespread adoption.

Thank you for this opportunity to share our support for the collaborative solutions that PAG brings to the regional table.

Comment 10:

As you take comments regarding the effectiveness of Regional Planning Organizations, the members of the Southern Arizona Leadership Council (SALC) would like to express our appreciation and support for the Pima Association of Governments (PAG). On a regular basis, we see the benefit of PAG's work in regional transportation planning. The importance of regional planning and projects with respect to infrastructure cannot be overstated.

PAG's collaborative approach with its member jurisdictions and transportation stakeholders is commendable. We appreciate their ongoing outreach initiatives to engage the public. We also appreciate the regular updates about PAG programs and services through its staff outreach, newsletters, website, and email communications. Their regional approach has contributed to making our Southern Arizona region a better place for our residents, businesses, and visitors.

We recognize that transportation resources are limited and the public's demand greatly outstrips those resources. Wise stewardship is imperative to allocate available resources most effectively. PAG has made significant improvements to our regional transportation network by skillfully programming federal, state, regional, and local dollars. These improvements have proven to be vital in service to the changing demographics of our region, ensuring that all have access to a variety of transportation options to meet their transportation needs. Therefore, we highly value PAG's efforts in leveraging new resources in collaboration with its members and other organizations.

We want to express our unwavering support for the collaborative solutions that PAG brings to the regional table. Thank you for your partnership with ADOT and PAG and for your continued dedication to advancing transportation improvements that will have a lasting impact on our region and its communities.

Comment 11:

As a Pima County resident and an acquisition and relocation assistance consultant and to the projects developed by the Pima Association of Governments (PAG), I support the recertification of PAG. It has been my experience that PAG supports the regulations found in 49 CFR Part 24. When they have a question, they never hesitate to reach out to myself or my local manager for some lively discussion.

Comment 12:

Thank you for your invitation for public comment. At the April 11, 2023, meeting of the Tucson–Pima County Historical Commission (TPCHC), a motion passed unanimously to submit comment on the FHWA & FTA recertification of the Pima Association of Governments (PAG), related to the transportation planning process and public outreach activities associated with the Regional Mobility and Accessibility Plan, and the Transportation Improvement Program. We submit comment in the form of a list of Historic Preservation Best Practices for Transportation Projects that can and should be applied to all transportation projects.

Public Outreach

- Notify nearest Historical Commission(s)/Preservation Commission(s) of public outreach.
- Perform preliminary historic/archaeological/cultural resource inventory before public outreach and before approval of project.

Transparency

- Create large, easy-to-understand maps of the project areas.
- Clearly show all historic buildings and cultural resources that could potentially be demolished, even if the alignment is not finalized.
- Create an objective, digital mock-up of a representative section of roadway, and/or conduct a public site visit.
- When conducting opinion surveys, offer a “no-build” or “just fix potholes” option.

Planning and Construction

- Notify nearest Historical Commission(s)/Preservation Commission(s) early in the planning process.

- Use design flexibility recommended by AASHTO Green Book, 7th edition, 2018, sub-chapters 1.1, 1.9, 2.4.5, 8.2.3, 9.2.4, etc., to design projects with a goal of zero demolitions of historic and potentially historic buildings.
- Allow, encourage, publicly advertise, and facilitate moving of historic or potentially historic structures that are slated for demolition.
- Do not demolish buildings until construction is fully funded and imminent.
- For large, long-term projects, divide projects into phases. The most historically sensitive phase should be built last.
- Transportation needs can change unexpectedly due to unforeseen factors (climate change, energy costs, pandemics, etc.), therefore projects should sunset and be reviewed every 5 years.
- An even higher level of care is required if the *roadway itself* is historic or potentially historic. Discuss preservation of historic features such as guard rails, lighting fixtures, etc. with the State Historic Preservation Officer and nearest Historical Commission(s)/Preservation Commission(s).

Please do not hesitate to reach out to me if you have any questions about this letter. We respectfully request that as part of the PAG recertification related to the transportation planning process and public outreach activities associated with the Regional Mobility and Accessibility Plan, and the Transportation Improvement Program that PAG be encouraged to incorporate these best practices.

Comment 13:

PAG Regional Council meeting:

“My name is David Higuera. As a concerned taxpayer and member of the public, *and* as a representative of Supervisor Matt Heinz and the residents of Pima County District 2, I’d like to address this PAG Regional Council’s ‘Call to the Audience’ protocol itself – a protocol that appears to be in place for many, if not all, PAG committees and subcommittees as well. On your publicly-noticed Agendas it states the following, in relevant part, regarding Call to the Audience:

“SPECIAL NOTICE: In accordance with the social distancing guidelines recommended by the Centers for Disease Control and Prevention (CDC) and other authorities relating to the COVID-19 pandemic, the meeting room will be open to the public.

[I’m sure when we were doing social distancing two and three years ago, that used to say

“Closed”. It continues:]

However, members of the public are invited to attend the meeting via the public access link above due to ongoing public health concerns.

[The link to the YouTube page, which makes it nearly impossible to ever see who is speaking. It continues:]

*In accordance with the Attorney General’s guidelines for conducting remote meetings, members of the public may submit written comments relating to this meeting, **in lieu of the call to the audience**, to info@PAGregion.com within one hour of the posted start time for the meeting. **These comments will be filed with the meeting’s records.***

[Having our questions and concerns “filed with the meeting’s records” – or insufficiently summarized by a PAG Staff member -- is a FAR CRY from being able to address our questions and concerns directly to the decision-makers at this table. The Special Notice continues:]

Alternatively, a virtual call-in option -- subject to technological availability -- may be available for comments under the Call to the Audience item on the PAG Regional Council meeting agenda.

*Interested members of the public should email info@PAGregion.com or call (520) 792-1093 **at least 24 hours prior to the start of the meeting** to confirm your interest in participating in the virtual Call to the Audience.*

[And furthermore, on the Agenda Item itself, it states:]

*“Speakers are limited to a three-minute oral presentation **telephonically**, subject to technological availability, and may submit written comments ...*

*Those wishing to address the Council should follow the instructions above under the Special Notice prior to the meeting **to specify the topic to be addressed.***

So, in conclusion: The written Agenda Materials make it sound like the public is ABSOLUTELY NOT welcome to simply show up, fill out a Comment Card, and address the body directly. In fact, it makes it sound like if you haven’t gotten your comments or questions in at least 24 hours in advance, you simply will not be heard.

As many fellow citizens are fond of reminding the Pima County Board of Supervisors at every

one of their meetings, you work for us.

Please demand that staff make the necessary changes immediately – for the Regional Council Agenda, the RTA Board Agenda, and for all PAG and RTA committee and subcommittee meetings as well -- to welcome the Public back into the process. Thank you.

RTA Board Meeting:

My name is David Higuera. I am here representing Supervisor Heinz.

On March 3rd, Supervisor Heinz addressed some questions to Supervisor Scott regarding the ongoing RTA Next development process, in hopes that Sup. Scott would see fit to raise some or all of them here with the full RTA Board. As Sup. Heinz concluded in that memo, which I've brought copies of today:

"I truly believe that if the RT A Board ensures these tough conversations are had – and diverse viewpoints heard *and incorporated* - we will be able to come up with an RTA Next plan that can garner majority public support."

Sup. Heinz raised the following questions, among others:

- How can we fix the broken CAC process, in which CAC members are pleading to be heard;
- How will we decide which Roadway projects must be cut, to stay within fiscal constraints;
- Are we comfortable with projected revenues, "pessimistic" or not, that are *still 25% higher* than revenues will have been for the first 20 years of the sales tax;
- The fact that the Framework is currently *silent* on the issue of Maintenance of roads we've already built, or will build, with RTA funds;
- The fact that the Framework is currently *silent* on the issue of *flexibility* and *adaptability* as we get 10, 15 years down the road – to meet actual demands and not outdated projections;
- The lack of adequate investment so far in the Safety Element, considering how poorly we're doing as a region in meeting our own Safety Goals as outlined in the RMAP2045; *and finally*,
- How do we avoid the situation of Fund Sweeps that we've seen with RTA1 *for the past 10 years*, which have meant that ALL the categorical elements got a LOT LESS investment than what was promised to the voters?

On the numerous community priorities within the **Safety, Environmental, and Transit Elements**, we've come up 40% short, 50% short or more! How does this square with keeping our promise to the voters, ***and how do we avoid making the same mistake again?***

In the March 6th letter **from** Chairman Yucupicio and Mr. Moghimi in response to Supervisor Heinz's concerns – *And Thank you Supervisor Scott for forwarding the concerns along* – the answers are incomplete and in some cases misleading.

For example, the memo states that, quote, *"the CAC has provided us with a list of recommended named projects."* But some of those projects were added or scrapped last minute – without adequate CAC deliberation, approved after the CAC had dragged on well beyond their supposed end time.

It says, quote, *"The CAC Transit Element Subcommittee has recommended percentages for each of the Transit sub-elements."* Again, not true. They have requested more data, as has the full CAC!

Meanwhile, the CAC has been told repeatedly that the size of each bucket is fixed, based on, quote, *"RTA Board direction."*

But the RTA Board direction was to use the 2006 Bucket sizes AS A *"STARTING POINT"* for figuring out the appropriate bucket sizes here, *and then to further refine them, with input from the CAC and others. It was not the end point – though staff is acting as if it were.*

And this CAC went through AN EXTENSIVE process last Fall to amend and adopt updated **Guiding Principles** to guide the development of the RTA Next Plan – **principles that uphold our communities' values and chief concerns**. Yet they are being handcuffed in trying to apply them.

Please do not allow the RTA staff to dictate the outcomes here. You can assert your authority, and we hope you will. Thank you.

Comment 14:

Comments regarding TDM/Commuter Services, Activity Code 39

The best way to see what activities actually occur during the year is to look at the money spent over that year, not the proposed strategies and tasks outlined in the OWP or the

budgets. TDM/Commuter Services, Activity Code 39 receives \$985,000/year in zero match STBGP federal dollars according to the TIP. However, the OWP shows only

\$558,275 available in FY22 and \$0 in FY23 (Appendix D Table 1 and Appendix E Table 1). Where is the remaining \$1,412,000 and what was it spent on?

In the FY22/FY23 OWP the Commuter Services budget shows the following expenditures for FY22:

- Personnel \$186,278
- Project \$190,000 including school pool software \$7,000, Sun Rideshare marketing \$30,000, vanpool subsidies \$110,000 and consultant for traffic signalization program \$50,000

FY23:

- Personnel \$190,743
- Project \$290,433 including school pool software \$7,000, marketing \$30,000, vanpool subsidies \$150,000, and consultant for traffic signalization program \$50,000

I requested invoices for PAG expenditures from ADOT so I could compare the actual expenditures with the OWP budgets. In my experience as a former PAG employee, the actual expenditures are dramatically different from the OWP budgets and no one, including ADOT makes that comparison.

I did not request PAG expenditures from PAG, because I know that PAG will not provide this information. When others have submitted Freedom of Information requests to PAG they have been denied by Mr. Moghimi claiming that PAG is a private entity and does not have to fulfill FOI requests.

ADOT provided PAG invoices for October 2021 to January 2023 or 16 months. In my review of these files I learned that PAG does not always provide receipts or invoices for expenditures. When I requested the missing backup documents, ADOT made no effort to obtain them from PAG.

I did not receive a full fiscal year, but I have enough information to draw conclusions as to how money is being spent on the Commuter Services program (Activity Code 3904 on the PAG invoices).

1. There are no personnel expenditures for Commuter Services. \$377,021 budgeted for FY22/23 will not be spent.
2. There are no marketing expenditures for Commuter Services. \$60,000 budgeted for FY22/23 will not be spent.
3. The highest expenditure for vanpool subsidies in one month was \$3,150, so the annual estimate for vanpool subsidies is \$37,800 or \$75,600 for FY22/23 combined. The budget shows \$260,000.
4. The school pool program is defunct so the \$14,000 for school pool software will not be spent.
5. The only expenditure for Commuter Services that matches the budget is \$48,775 (CY 2022) for consultant for traffic signalization program at \$50,000.

What the PAG invoices, my 12 years of work experience at PAG and my in-depth research show is that most of the activities listed in the FY22/23 OWP are not being attempted or accomplished.

- There is no community outreach. See attached opinion column published in the *Arizona Daily Star* on October 17, 2022.
- There are no promotions to increase ridesharing participation
- There is no program to reduce traffic congestion at area schools
- There is no promotion of alternative fuel vehicles to area employers
- There is no real-time ridesharing app or program to promote informal ridesharing
- The vanpool program is down to nine vans, most receiving \$300/month subsidy. The subsidy was \$500/month in 2019.
- Sun Rideshare marketing materials are generally three years old or more and the infomercials are over five years old.
- Sun Rideshare newsletters cannot be found on the pagregion.com website.
- The sunrideshare.org website has no relevant or current information available.

Sun Rideshare Commuter Services has no dedicated staff, no outreach campaigns, no community engagement, no incentives, no marketing, no advertising, no promotions, no website, no public education, and no guaranteed ride home. Sun Rideshare has no presence on social media including Twitter, Instagram and Facebook. With the elimination of the Clean Cities Program by Mr. Moghimi PAG has no alternative fuels or electric vehicles program.

In FY2023 and FY2024, PAG will receive over \$3,000,000 per year (STBGP and Carbon Reduction Program funding) to implement programs that reduce auto emissions. PAG has no

programs to do that (see Call to the Audience comments below). As the funding for TDM and air quality programs grows, PAG's commuter services program continues to shrink as can be seen in the proposed OWP for FY2024 and FY2025. So where is all that money going and how will auto emissions be reduced?

Opinion column published in the *Arizona Daily Star* on October 17, 2022

Thank you Pima County Department of Environmental Quality (PDEQ) for hosting the Activate Your Commute event on October 18 at the Public Works building downtown. This great event is free and open to the public. Anyone interested can learn about all the alternative transportation modes available for your commute trip to work or your personal travel. You can learn more about the event on Facebook or Pima County's website.

This event is particularly important now, because of the need to reduce auto emission. This past summer 11 air quality advisories were issued for poor air quality due to high levels of ozone and particulate matter. We also know that auto emissions are a major source of greenhouse gases leading to climate change. Reducing car trips and using other forms of mobility reduces those unhealthy tailpipe emissions.

Activate Your Commute was created back in 2018 by PDEQ in partnership with Pima Association of Governments (PAG). There were exhibitors in the library plaza and workshops in the library conference room. Around 200 people attended from a variety of downtown employers. It was a great success and very much appreciated by all the attendees.

All the mobility providers like Sun Tran, Commute with Enterprise, TuGo, Razor, and Spin will be exhibiting at this year's event. Pima County and the City of Tucson will also be sharing information on their environmental programs and transportation options.

One major source of commuter information and a local transportation provider will not be there and that's PAG/RTA. PAG/RTA is the one organization specifically funded by the state of Arizona, the federal government and your tax dollars to promote and provide alternative transportation and transit.

Mr. Moghimi, the executive director of PAG/RTA, is refusing to participate in this event. PAG receives over one million dollars per year for alternative mode programs, yet refuses to participate in a free community event hosted by two of the jurisdictional members of the PAG Regional Council and the RTA Board.

Under Mr. Moghimi's leadership, PAG/RTA has also terminated its participation and funding of all community events including Cyclovia, Bike to Work Day, Walk-N-Roll to School Week, and Earth Day. All these events are free to the public, promote clean air, healthy living, and active transportation. A one million dollar budget should easily help fund all these events plus some. Once again, PAG has failed in its mission to enhance our region's mobility, sustainability and livability.

Comments for Call to the Audience at the RTA Next Citizen's Advisory Committee Meeting on March 20, 2020.

My name is Ruth Reiman. I recently retired from PAG where I worked as the Transportation Demand Management or TDM Manager for 12 years.

I attended the last CAC meeting and listened to the discussion about how to increase transit ridership and build community awareness. It was very hard for me not to wave my hands and shout out that there's existing programs for that called Sun Rideshare and the Travel Reduction Program.

These programs were created decades ago for the purpose of reducing air pollution and congestion. Over the years Sun Rideshare and TRP became the region's commuter assistance program and the clearinghouse for all things TDM. However, over the last two to three years these programs have been defunded and gutted by PAG management. It is not due to a lack of funding but due to management decisions.

In the TIP there is 1.2 million zero match dollars appropriated for TDM. However, only 40% of that money is being spent on TDM. The other 60% is going unspent or redirected to other PAG programs. For comparison, the Capitol Rideshare program, which serves 20,000 state employees in Phoenix, has more resources dedicated to the promotion of alternative transportation than PAG, which serves 400,000 commuters.

Over the last two years key program elements and initiatives, standard in most TDM programs, including Sun Rideshare and TRP have been terminated, such as:

- Learn to ride the bus and streetcar workshops
- Incentives, such as free daily bus passes
- Community and employer outreach
- Advertising, promotions and marketing
- Newsletters

- Information sharing across all the jurisdictions
- Educational infomercials for the workplace
- Recognition for successful employer programs
- Trip planning software
- Carpool matching software
- Commuter assistance for new businesses
- And my favorite, Guaranteed Ride Home, which was the safety net for alternative mode users

All terminated.

My position at PAG has not been filled. The TRP Outreach Coordinator position has not been filled. For the first time in 25 years there is no TDM professional at PAG. All these program elements when implemented, along with knowledgeable and dedicated staff have historically produced real successes.

So I suggest to this committee if you want to shift the paradigm, educate the community and improve the public's awareness about their transportation options, as well as reduce congestion and auto emissions, your first step should be to ask PAG's executive director to use all the available TDM funds on TDM programs, such as Sun Rideshare and the Travel Reduction Program.

Comment 15:

The members of The Greater Vail Area Chamber of Commerce wish to express our strong support for the recertification of the Pima Association of Governments (PAG) as the Metropolitan Planning Organization (MPO) for the Tucson Urbanized Area by the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA). As one of the primary organizations focused on the Southeast Pima County growth areas, we are keenly aware of the vital role that PAG plays in coordinating transportation planning efforts and promoting balanced development in our community.

PAG has a long history of effectively managing transportation planning and funding for Greater Pima County and the Tucson Metropolitan Area. PAG's collaborative approach involves local governments, transportation agencies, transportation providers, and the public in developing and implementing transportation plans that address the diverse needs of our growing region. PAG's efforts have resulted in significant advancements in transportation infrastructure, improved public transit options, and increased safety for commuters and pedestrians alike.

In addition, PAG has consistently demonstrated its commitment to sustainable and equitable transportation planning. PAG has incorporated policies and initiatives to promote environmentally friendly transportation options and has made efforts to ensure transportation planning takes into account the needs of underserved communities and promotes social equity by addressing disparities in access to transportation services.

Furthermore, PAG's engagement with the public and stakeholders is commendable and PAG is committed to expanding its outreach and opportunities for input. PAG regularly seeks input from the community through public meetings, workshops, surveys, and other outreach efforts. PAG's inclusive approach ensures that the needs and perspectives of our diverse community are taken into consideration in the decision-making process. With a large number of established communities within unincorporated Pima County, PAG's strategic outreach efforts are valued.

As the Tucson region continues to grow and evolve, the importance of effective transportation planning cannot be overstated. PAG's expertise, dedication, and collaborative approach make it well-suited to continue serving as the MPO for the Tucson Urbanized Area.

Thank you. Please contact me if you have any questions or require further information.

Comment 16:

I want to believe in PAG and RTA, but nearly every project has gone over budget and the aspects of the projects cut are always pedestrian, bicycle, or transit infrastructure. I drive, ride a bike, take transit, and walk around Pima County. The lack of effort to make an equitable and balanced transit system is blinding. We move so few cars on such a large and expensive infrastructure and relegate everyone else to the shoulder. I am tired of promises of multi-modal transit system with glossy images of HAWK crossings and bikeways as the advertisement followed by Grant Road, Broadway, or Downtown Links.

I will not vote for RTA Next currently. I have no trust that the needs of all members of our community are being represented. For something to change, I would need assurance that more than only car infrastructure will be delivered.

Comment 17:

Thank you for the opportunity to submit comments regarding the transportation planning process and public outreach activities. The City of Tucson, as the largest incorporated city

within the Metropolitan Planning Area (MPA) representing over 50% of the region's population, has concerns about PAG's changing processes and planning efforts in the last several years.

For decades, PAG has been a trusted regional partner, providing a forum for member agencies to discuss and address matters of regional importance through jointly developed, predictable, and transparent planning and programming processes. The City of Tucson asks that the MPO be asked to consider the following items during the Federal Recertification process:

Provide Better Clarity in the Transportation Improvement Program (TIP) Process

Over the last several cycles, the TIP process and programming funds through the MPO has grown increasingly unpredictable.

During the prior 2022-2026 TIP update cycle, PAG staff introduced a new TIP processes and Notices of Funding Authorizations (NOFAs). In 2021, PAG staff sought a recommendation approval of the 2022-2026 TIP from PAG's technical committees that was incomplete and did not include all projects and funds. PAG technical committees ultimately withheld approval of the document until PAG could fully account for funding.

Additionally, PAG issued three NOFAs in quick succession during the same TIP cycle. The new process called for project funding considerations under the July 9, 2021 RTA NOFA to take three new alternative routes by 1) going straight to the RTA Board (with no other committee review), 2) possibly being reviewed by the TMC project review task force, and 3) possibly being reviewed by the RTA Citizens Accountability for Regional Transportation (CART) committee. It is unclear which process will be applied when and to which funding requests. These processes had never been executed previously and do not include the subject matter experts of TIP Subcommittee and Transportation Planning Committee. This resulted in considerable confusion among implementing agencies and members of the public, with no single committee understanding the full picture of

available funding. These separated processes were unprecedented, unnecessary, and created more obstacles for member agencies to get the necessary funding to deliver projects.

As a jurisdictional member, we would like to see consistency and clarity in the process from year to year.

Provide Clearer Information on Programming of Carbon Reduction Program Funds

PAG was the recipient of \$2 million in new funding under the Carbon Reduction Program under the Bipartisan Infrastructure Bill (BIL). PAG staff has approached the use of these funds as an administrative matter and included the funding in their Overall Work Program. We would like to see PAG involve the member jurisdictions in the planning of the use of these funds for the region.

Failure to Address Federal Planning Emphasis Areas

In 2021, FHWA and FTA released the updated Planning Emphasis Areas (PEAs), which include Tackling the Climate Crisis, Equity and Justice⁴⁰ in Transportation Planning, Complete Streets, Public Involvement, and Planning and Environmental Linkages, among other items. We have not seen a proactive approach by PAG to address the updated PEAs.

In recent months, we feel PAG has fell short of meeting the mission of the organization, which is “to build consensus among its members and the public on regional planning for transportation, watershed and air quality, and economic vitality.”

Please feel free to contact me directly if you have any follow-up questions to our comments.

Comment 18:

Thank you for the opportunity to submit comments and documentation regarding the federal certification process of the Pima Association of Governments (PAG) as a federally designated Metropolitan Planning Organization (MPO).

We prefer to remain anonymous for fear of retaliation and hope that these comments will not be shared verbatim with the MPO but will rather be summarized as a list of issues or concerns to be cataloged or addressed. Attachments are included which tell the story in PAG’s own words of the issues that are itemized in this correspondence. There exist several examples of potential retaliation being exercised by PAG executive leadership in numerous reprimand memos, rebuke memos, threats of removal and threats of legal action with accusations of harassment from PAG issued to citizen volunteers and other stakeholders who have criticized the MPO and its leadership since the last certification review.

The information provided below has been prepared with help from a variety of individuals who are providing anonymous oversight related to the activities of the Metropolitan Planning Organization and providing fact-based observations.

Beyond this, it remains unclear whether the MPO is transparently delivering on its obligation of a continuing, cooperative, and comprehensive ("3-C") planning process and whether the agency is fulfilling its planning obligations, upholding the spirit of its planning factors and planning emphasis areas. We know that MPO's have an obligation of establishing and managing a fair and impartial setting for effective regional decision-making, evaluating and providing transportation alternatives as options for transportation investment, and equitably involving the general public in the planning process.

In recent years, under the current executive leadership of the organization, there has been an erosion of trust between jurisdictional staff/citizens/stakeholders and the leadership of PAG/RTA that has made building consensus more difficult if not impossible. The collaborative decision-making process has been sacrificed in favor of a PAG/RTA staff-driven decision-making model. This model is unpredictable, non-transparent, non-inclusive, non-consensus building and designed and dictated by the executive director.

There have been numerous attempts by jurisdictional member agencies to request changes to the process to facilitate a "continuing, cooperative, and comprehensive ("3-C") planning process, yet the course taken by the current executive leadership has been to dismiss the involvement of the jurisdictional technical staff and has only increased antagonism between jurisdictional staff and PAG/RTA, making previously straightforward decisions, such as approval of the TIP and OWP, much more difficult.

Furthermore, this approach has led to unilateral decisions by the executive leadership that ignore long-standing programs that the MPO has been engaged with calling them "Extraneous Matters" or "liability concerns."

The steps taken by the MPO may not fully constitute a violation of its federal requirements, but it appears that its actions run counter to the spirit of the MPO to facilitate a cooperative planning process through collaboration with governments, interested parties, and the public. The role, services and value of the MPO to its members, the public, and its administrators has deteriorated alarmingly. The trust between PAG and its member agencies has been significantly eroded due to unclear and ever-changing processes and procedures, reduced transparency, increased unilateral decision making by PAG staff, and continual efforts to stifle discussions of regional significance by member agencies and the public. The process being executed by the executive leadership is divisive and damaging to the regional partners. The public has recognized that PAG is no longer the place that stakeholders come to for opportunities to collaborate on regional issues. It is failing to fulfill its core responsibilities and is in need of significant course correction.

Specific areas of concern are summarized below:

PAG Overall Work Program development and review process

There has been what appears to be an unauthorized alteration of the PAG OWP development and review process to eliminate opportunities for input and review. The PAG executive director altered the OWP process to enable consent approval of a \$26M budget with no consultation or authorization. Consent approval of OWP and budget (up to \$28M) was established immediately after the current executive director took over in 2014. Prior to that, OWP development was done in a more transparent manner with regular discussion and action agenda items two to three times a year including Regional Council (RC), Management Committee (MC), Transportation Planning Committee (TPC) as well as additional input from other subcommittees and stakeholders.

When asked what actual input to the draft OWP was given by member jurisdictions, the executive director replied that the draft OWP builds upon the continuation of previous Regional Council action. However, the current 2-year OWP was approved in 2019 through consent action. It was never presented to or discussed by the Regional Council during that process. No presentations were made by PAG staff describing the content, nor did the RC discuss the work elements or PAG budget. No OWP discussion has occurred at any committee since before 2017. Only one Regional Council member was on the Council during the last opportunity for any committee discussion.

This apparent unauthorized change to the development and review process led to the denial by the PAG Management Committee to recommend approval of the OWP due to inadequate information and review.

There has also been what appears to be an unauthorized change to the powers and duties of PAG committees without direction or consent by full Regional Council, as required in the bylaws. The executive director unilaterally eliminated the role of the PAG Transportation Planning Committee (TPC) and PAG Management Committee to develop recommendations for funding and recommend approval for TIP and OWP. After requesting recommendation of approval and not getting it for the draft PAG OWP, the executive director unilaterally determined that role was not one the Management Committee should have, even though they have had that role for decades. A memo outlining this decision was prepared by the executive director for the newly appointed RC chair, stripping MC of the duty to make recommendations on the draft PAG OWP. The PAG Bylaws clearly identify that authority lies with the Regional

Council by stating "The Regional Council shall authorize and define the powers and duties of all committees established by the Regional Council", not the executive director or the Regional Council chair.

This new process led to PAG's failure to deliver an approved PAG work program and budget before the start of the new FY 2022-2023 time period, the first time in perhaps its entire history. The process designed by the executive director did not include steps for review and input from member agencies and other stakeholders. The process led to the tabling of approval of the draft PAG OWP FY 2022 and FY 2023 and the addition of time, meetings and materials to allow for review and input to take place as insisted by the PAG Management Committee. This process led to nearly losing regional funding and unnecessary administrative maneuvers to ensure that funding was retained.

OWP - Carbon Reduction Program

In June 2022, PAG processed an OWP Administrative Amendment with no notification to or consultation with PAG Regional Council whereby it added \$2.1M of "CRP Grant" funding into the PAG budget replacing a \$2M budget line item in the PAG FY 2022 and FY 2023 OWP entitled "Future Funding." PAG's executive director has since released memos taking the position that the CRP funding is to be incorporated into the PAG OWP for already existing OWP activities. We have not found another MPO that takes the position that the new Carbon Reduction Program funds are theirs to use for work they are already doing within the MPO. We have seen that most MPO's throughout the country have administered a process by releasing calls for projects to their member jurisdictions to use the CRP funds for eligible carbon reduction projects focusing on implementation projects.

PAG's unilateral decision-making on the best use of the CRP funds clearly does not meet the requirements of this guidance, therefore, it is imperative that jurisdictional and public involvement be incorporated into the decision-making process for the use of these funds. Without an opportunity to discuss this item at committee meetings, it ensures that this requirement will not be met. Many OWP items appear to be either defunct or have no activity (transportation safety education in schools, school pool, carpool/rideshare program, transportation safety curriculum, safety PSAs, Air Quality Subcommittee, Intelligent Transportation Systems planning and architecture, Congestion Management Process, etc). The PAG member agencies are no longer involved in the development of the PAG OWP and the Regional Council has now approved OWPs through its consent agenda with no discussion whatsoever. There is little detail, no budget, and no opportunities for input from any parties outside the Regional Council. In the past, member agencies contributed to the OWP's content to best address the needs of the region through a cooperative process. The OWP has now been

framed as a “contractual matter” between PAG and ADOT and the PAG Regional Council and all advisory committees have been notified that they are “expressly prohibited from interfering in the administrative affairs of PAG/RTA and their operations.” (PAG/RTA IGA (pg. 156) <https://pagrta.app.box.com/s/6rk1pgwaul3d0mr2v8sszer3ha3tbfou>)

It appears that the executive director has attempted to alter the role and oversight responsibilities of the Regional Council and RTA Board themselves through the incorporation of “No Interference” language in the MOU between PAG and RTA. This unauthorized change to the authority of the governing bodies appears to be in direct violation of the bylaws. The MOU warns that “He (Executive Director) will coordinate all activities of the PAG Council and RTA Board and Committees to facilitate accomplishment of the Mission without interference by others.” The MOU further warns the RC and RTA Board to stay out of the executive director’s affairs by stating:

“No Interference. PAG Council and the RTA Board, including all their affiliated advisory Committees, have no administrative powers and are expressly prohibited from interfering in the administrative affairs of PAG/RTA and their operations. Individual PAG Councilmembers or RTA Board members shall not direct or in any manner take part in the administration of PAG/RTA operations. Except for the purpose of inquiry, PAG Council and RTA Board and their members shall deal with the administration of PAG/RTA solely through the Executive Director and neither the PAG Council, RTA Board nor any official from PAG/RTA jurisdictional members shall give orders to any subordinates of the Executive Director, either publicly or privately, related to the administration of PAG or RTA or their affiliated programs.”

The 2023 Committee fact sheet developed by PAG further states:

“The PAG Regional Council and RTA Board, including all their affiliated advisory Committees, are not authorized to conduct PAG or RTA administrative duties. Administrative duties are the sole responsibility of PAG’s professional staff. Individual committee members shall not direct or in any manner take part in the administration of PAG/RTA operations.” (PAG 2023 Committee Fact Sheet Pg. 4, https://pagregion.com/wp-content/docs/pag/2022/01/Committee_Fact_Sheets.pdf)

Under normal circumstances, this language would not raise much concern. However, when considered in the context of the broad definition PAG legal counsel is applying to “administrative functions” and “extraneous matters,” a pattern becomes clear of PAG/RTA staff empowering itself to determine which matters are and are not “administrative functions” or “extraneous matters” and using that determination to curtail regional discussions through PAG

committees. Efforts by committee members to bring issues to the table for discussion or to seek to agendaize items, such as safety planning, Carbon Reduction Program funding or requests to discuss the regional pavement program, are then deemed “interference in administrative functions” by PAG staff and the items are not discussed. (PAG Attorney Memorandum Re: Involvement in Road Safety and Pavement Maintenance, page 3, attached)

(Sources, PAG public records; PAG Management Committee May 12, 2021 - <https://youtu.be/ElErjBJiVjw>)

(Sources, Regional Council public records; PAG public records; PAG Management Committee May 12, 2021 - <https://youtu.be/ElErjBJiVjw>)

(Sources, PAG Bylaws, PAG committee records, MOU between PAG and RTA for FY 2021/2022, PAG Carbon Reduction Strategies Memo 2023-04-06, attached)

Unilateral decision to eliminate PAG Department of Energy Clean Cities Program

In 2020, PAG’s executive director eliminated the successful and renowned PAG Tucson Clean Cities program without any consultation, direction, or action from the Regional Council through what appears to be an unauthorized, unilateral decision making process. This was done at a critical time when the region was looking at significant investment opportunities under the Biden administration, and it has significantly diminished the region’s chances to land important grant funding. The program status was reclassified to “inactive”, and it was removed from the national Clean Cities Coalition due to a significant decline in community activities, diminished frequency of meetings, reduction in territory served, unacceptable performance, and unauthorized withdrawal of Federal funds before programs were delivered.

PAG Regional Council was never provided the opportunity by staff to determine whether they wanted to recommit the organization to the program during the eight-month conditional period. They had no input into whether PAG would continue in its Clean Cities role. While we recognize that Clean Cities was not an FHWA/FTA administered program, it is another demonstration of PAG not emphasizing tackling the climate crisis and making decisions at the staff level without involving its policy board.

This appears to be a failure to fulfill fiduciary duties and obligations by misappropriating federal funding from the U.S. Department of Energy by executing unauthorized withdrawal of Federal funds before work tasks and deliverables were completed and approved.

Collection of Clean Cities membership dues during the probationary period in the final two months of the program ending January 6, 2020 when the program was designated “inactive” due to concerns and issues identified by US Department of Energy and unaddressed by PAG.

Dues collected from November 2019 through January 6, 2020 “inactive” designation were never returned to coalition members even after several requests. Dues collected and held by PAG were in the range of \$25,000.

(Source, PAG committee records, U.S. Department of Energy correspondence with PAG, Tucson Clean Cities Coalition, attached)

Regional Partnering Center – Use of Public Funding

PAG has established and is operating a Regional Partnering Center that is closed to the public and jurisdictional staff, is not representative of PAG’s member agencies, yet uses public (STBGP) funding loaned by PAG to the RPC to conduct smart region work that is unclear to the Regional Council and member agencies.

(Source, PAG committee records)

Federal Planning Emphasis Areas

In 2021, FHWA and FTA released the updated Planning Emphasis Areas (PEAs), which include Tackling the Climate Crisis, Equity and Justice⁴⁰ in Transportation Planning, Complete Streets, Public Involvement, and Planning and Environmental Linkages, among other items. There has been no effort made by PAG, to our knowledge, to address any of the listed PEAs. PAG’s approach of CRP is contrary to the intent of tackling the climate crisis, and their lack of transparency and efforts to stymie legitimate public criticism and debate do not foster meaningful public involvement.

Committee Process – Repeated Denial of Requests for Discussion

Over the last several months, member agencies have requested discussion and agenda items for regional safety planning, the regional pavement program and the Carbon Reduction Program. All requests have been repeatedly denied by PAG numerous times. PAG staff provided the organization’s rationale in a March 14th staff memo and complementary opinion from PAG’s legal counsel, stating that the jurisdictions are requesting items that are “not required of the MPO.” They then stated that “risk management is an administrative function” and that “the Executive Director and designees have the authority to manage administrative decisions” thereby limiting opportunities for discussion amongst PAG’s technical committees.

PAG’s legal counsel summarizes PAG’s position by stating:

“PAG does not have any legal authority over public rights of way. Moreover, roadways generate a great deal of litigation and liability. For a nonprofit corporation, without any governmental

liability protection or access to a governmental risk pool, to expose itself to the county-wide risks of evaluating public roadway conditions and safety, would unreasonably jeopardize its core missions.”

This is an extension of PAG’s position that they cannot involve themselves in “extraneous matters,” a justification they have also used to limit discussions at meetings of their technical committees under administrative fiat. (Communications regarding administrative matters and extraneous matters attached)

It should be noted here that PAG is establishing a position through these communications that it only needs to address the bare minimum requirements of the MPO and all other matters are “extraneous” or “administrative decisions.” Furthermore, it is establishing itself as the sole party to determine what is “extraneous” or “administrative” with no criteria for either. This position is alarming for a number of reasons:

1. The region is in the midst of a transportation safety crisis, and to see an MPO that leaves its member agencies on their own is disheartening to say the least. We have not found another MPO that takes this position or anything close to it. All MPO’s we have ever seen embrace the challenge of improving transportation safety and work collaboratively with their member agencies and the public.
2. The pavement program has been operating in the region for over 25 years and suddenly there is a liability issue associated with it? The program has collected pavement condition data on the entire Federal Aid Network throughout that time and was established to provide pavement condition information to member jurisdictions to assist them in the management of the pavement assets that they own. It has always been understood that prioritizing funding and making roadway improvements were the responsibility of the owning agency. Again, seeing an MPO pulling away from supporting its member agencies when they need collaboration and valuable performance data most, is disheartening.
3. These communications were issued without the direction of the MPO Regional Council and were sent directly from PAG staff to members of the technical committee. There was no policy discussion at the Regional Council.
4. Emphasizing the preservation of the existing transportation system and increasing the safety of the transportation system are explicitly listed as within the scope of the metropolitan planning process § 450.306(b), so it is unclear how staff has determined they are outside of the MPO’s core mission.

(PAG Attorney Memorandum Re: Involvement in Road Safety and Pavement Maintenance, attached)

Transportation Improvement Program (TIP) Process

Over the last several cycles, the TIP process and programming process through the MPO have grown increasingly unpredictable.

PAG/RTA leadership have unilaterally, and without direction from policy boards, created new processes for distributing funding in the region that increases confusion and reduces the role of member jurisdictions and other PAG/RTA committee members in informing consensus decisions.

PAG staff have issued TIP Amendments for approval by the Regional Council superseding the responsibility issued by Regional Council to TIP Subcommittee and Transportation Planning Committee to oversee the TIP and recommending fund programming adjustments directly to the Regional Council. There have been instances where previously available federal STBG funding underwent no notification process as outlined in the TIP Policies and Procedures and was simply programmed through TIP Amendment upon direction of the executive director, such as with additional funding being programmed on Ruthrauff Rd traffic interchange.

The PAG-led programming only surfaced when jurisdictional staff noticed additional federal funding appearing on a project within the 200+ project table in the draft TIP. Had technical staff not been watching closely, the addition would have likely moved through the committees without comment, resulting in funding decisions being made entirely by the executive director. The fact that the jurisdictions, and therefore the public, were excluded from the decision while information was buried within a larger document is concerning and in direct conflict with the role of an MPO. Had technical staff not noticed the additional funding, it would have moved through the committees and then been presented by PAG/RTA leadership as if having been approved unanimously.

In the most recent TIP development cycle, PAG has refused to program funds for 2027 and 2028 on anything but Arizona Department of Transportation (ADOT) and airport projects, stating that TIP development is a “step-by-step” process. When challenged on this premise by member agencies, PAG responded by delaying the update of the TIP and instead defaulting to just continuing to amend the existing document. This provides no clarity to the implementing agencies and adds unnecessary barriers to predictable project delivery. (PAG FY 2024-2028 TIP development process memo to TIP, attached).

During the prior 2022-2026 TIP update cycle, PAG staff again introduced new, and unauthorized TIP processes and Notices of Funding Availability (NOFAs). In 2021, PAG staff sought a recommendation of approval of the 2022-2026 TIP from PAG's technical committees that was incomplete and did not include all projects and funds. PAG technical committees ultimately withheld recommendation to approve the document until PAG could fully account for funding.

Additionally, PAG issued three NOFAs in quick succession during the same TIP cycle. The new, and never before seen, process designed by the PAG/RTA Executive Director called for project funding considerations under the July 9, 2021 RTA NOFA to take three new alternative routes by 1) going straight to the RTA Board (with no other committee review), 2) possibly being reviewed by the RTA TMC project review task force, and 3) possibly being reviewed by the RTA Citizens Accountability for Regional Transportation (CART) committee. It was unclear which process will be applied when and to which funding requests. These processes had never been executed previously and did not include the subject matter experts of TIP Subcommittee and Transportation Planning Committee. This resulted in considerable confusion among implementing agencies and members of the public, with no single committee understanding the full picture of available funding. These separated processes were unprecedented, unnecessary, and created more obstacles for member agencies to get the necessary funding to deliver projects. The new processes establish further disenfranchisement of the member jurisdictions by cutting their experts out of the recommendation process and not allowing anyone to see the full funding picture.

Additionally, if the participants themselves are not provided clarity on how decisions are made at the organization, where does that leave members of the public who wish to have a say in how transportation planning and programming is conducted in the region?

Predictable processes exist for a reason at an MPO. They are there to create certainty and buy-in amongst members who are attempting to come together to make regionally important decisions and provide transparency to the public. Unilateral and arbitrary changes to processes that have been developed jointly and agreed to over many decades is like the referee changing the rules in the middle of the match and then choosing the winner based on his own scoring system.

As of the writing of this comment letter, there are hundreds of millions of dollars in regional funds that remain unprogrammed as implementing agencies await clarity from PAG on how and when funds will be made available for programming.

Opportunity for jurisdictional technical experts to develop recommendations for programming of funds has virtually been eliminated.

The jurisdictional staff were shown programming recommendations in the form of separate projects lists by PAG/RTA staff and asked to approve each of them on the spot at committee meetings.

It is unconscionable to think that our MPO is keeping the available funding picture from its member jurisdiction transportation experts (and its own Council/Board), all while sitting on over \$100M of unprogrammed regional funding. It is as though our MPO does not want others to know how much money is available! Why? Doesn't that make project delivery more difficult and keep the delivery of the projects in "unknown" status?

(Sources, PAG committee records, July 9, 2021 Notice of Funding Availability, PAG Call for Projects for the PAG Fiscal Year 2023-2026 Competitive, attached)

Long Range Transportation Plan – Public Engagement

The 2020 Update of the Regional Mobility and Accessibility Plan 2045 was updated with minimal public input. PAG simply “rolled over” the public engagement from the 2016 version of RMAP to the 2020 Plan noting, “Public input was actively sought throughout the development of the plan adopted in 2016 [the previous version of the RMAP].” PAG took this “light touch” update to the RMAP so as to not confuse the public with the on-going RTA Next planning activities, in another example of how the MPO responsibilities have become secondary to the RTA. This is deeply concerning. While we recognize the importance of voter-approved funding for transportation, PAG has noted, the RTA Next plan only represents 6% of the region’s transportation needs. It appears that comprehensive planning is being sacrificed for an opportunity to address 6% of the region’s transportation needs. PAG/RTA staff are also now claiming that they are basing the RTA Next plan on the current 2045 RMAP, which is based on public input from over seven years ago.

Now almost three years past the approval of the 2020 edition of the RMAP, the RTA Next planning process continues, even as PAG prepares for the 2055 RMAP, with required adoption less than 18-months away. It remains unclear how the RTA Next and RMAP planning processes will interrelate, for a second time.

(Sources, PAG committee records, PAG 2045 RMAP Update, page 4, https://pagregion.com/wp-content/docs/pag/2021/08/2045_RMAP_Update-2.pdf)

Transportation Alternatives (TA) Set-Aside - Lack of Transparency in Awarding Funds

FHWA guidance for TA Set-Aside funds recommends that “MPO’s provide for adequate public involvement and transparency as they develop their competitive processes. A competitive process should allow project sponsors to understand the project selection evaluation criteria and how projects will be evaluated.” The most recent PAG Call for Projects for the TA Set-Aside program deviates from long standing practice and runs counter to this guidance.

PAG developed a new process for TA Set-Aside funds with no input from others. The process and the development thereof does not appear to have involved the public or provided for transparency explicitly required in the FHWA guidance. The member agencies and more importantly, the public were not involved in the development of the competitive process as explicitly stated in the FHWA guidance. There appears to have been no transparency in the development of the process or the administration of it.

The evaluation criteria for how projects were selected was not made available to project sponsors prior to award, in spite of requests from applicant agencies and contrary to guidance provided by FHWA. In fact it was not revealed until project selection had been made and a memo stating that member jurisdictions were not allowed to contest the results was issued by PAG.

The selection process outlined in the Call for Projects represents a break from the long-standing practice of involving the PAG Bicycle & Pedestrian subcommittee (which has not convened since before the previous certification review from what we can tell) as the selection panel to review and recommend projects for RTAG (aka TA) funding, and instead describes an unnamed selection committee that will review projects and make a recommendation to the TPC. Yet another new process. Jurisdictional members with candidate projects have recently been expressly restricted from participating on the selection panel. Yet another new process. Jurisdictional members were restricted by PAG from seeking future regional funding for any of the projects requested should the awarded funds end up not being sufficient to deliver the project(s). A new policy with no Regional Council action or awareness.

What is more, the Call for Projects restricted funds only to projects that could advance the goals of the Regional Transportation Authority. This was not made clear to applicants and appears to contradict the guidance provided by FHWA. A new policy restricting funding eligibility to RTA Category #41 projects at the direction of PAG staff and not the MPO’s policy board.

The new process administered for the RTAG funding does not appear to have followed the primary funding source, in this case federal Transportation Alternatives funding.

FHWA Transportation Alternatives Set-Aside Implementation Guidance cited in the MPO's call for project memo clarifies:

"States and MPOs have discretion in establishing project priorities, or whether to fund (or not fund) particular eligible categories, although the competitive process used must prioritize project location and impact in high-need areas as defined by the State, such as low-income, transit[1]dependent, rural, or other areas. 23 U.S.C. 133(h)(4)(D). The competitive process may include other criteria giving priority to projects that meet the desired goals of the States or MPOs."

While PAG stated that federal requirements were followed and bonus points were provided to low-income Transportation Analysis Zone (TAZ) areas, this non-transparent afterthought hardly constitutes "prioritizing" project location and high-need areas.

Additionally, the Bipartisan Infrastructure Law Transportation Alternatives Fact Sheet specifically states under the state and local competitive grant program:

"FHWA staff should encourage every State and MPO to prioritize using TA Set-Aside funding to advance the purposes of the program to promote safety, equity, and climate sustainability consistent with FHWA Policy."

These purposes do not appear to have been representative in the selection process that was shared after project awards were made.

(Sources, PAG committee records, FHWA Memorandum Transportation Alternatives Set-Aside Implementation Guidance, March 30, 2022, https://www.fhwa.dot.gov/environment/transportation_alternatives/guidance/ta_guidance_2022.pdf)

MPO Staffing - Instability

Since the last certification review, 34 of roughly 50 PAG staff have left the agency or come and gone from the agency. This includes losing over 30% of PAG RTA workforce (16 employees) in less than 24 months, including four Directors, the RTA Finance team, and the RTA Transit team. Staff morale at PAG RTA is rated as "extremely low." Staff are "fearful of leadership," have

rated opportunity for career growth as “below average”, have identified the agency reputation as at its “lowest in years”, and have identified possibility of any change as “little to none.”

It appears that the MPO staff that are critical of the agency’s leadership may have been rooted out or have abandoned the MPO that no longer shows any signs of growth or innovation.

(Source, PAG employment records, interview surveys with current and former PAG RTA staff)

Summary

While PAG has always been careful to follow the letter of the rules and regulations, they appear to regularly violate the spirit of the mission of the organization and of MPO’s “to build consensus among its members and the public on regional planning for transportation, watershed and air quality, and economic vitality.”

We have not seen much evidence of collaborative planning or consensus building in recent years.

Comment 19:

AARP is writing in support of the Pima Association of Governments (PAG) recertification as a metropolitan planning organization for the Tucson urbanized area.

We appreciate the regional transportation planning work of PAG as a federally required metropolitan planning organization and its programming of federal, state, regional and local dollars to improve our regional transportation network.

These improvements are important to the ongoing changes in our demographics to provide a variety of transportation options to meet the needs of everyone.

Through its public outreach efforts, we see that PAG continues to work as a collaborative organization with its member jurisdictions and its transportation stakeholders. The ability to work together to address regional solutions is a long-standing tradition of Pima Association of Governments.

We are aware of opportunities to participate in providing input of feedback to PAG through its newsletters and other email communications, as we appreciate being alerted to the programs

and services Pima Association of Governments is providing for our region to make it a better place to live for all our residents, businesses and visitors.

We know that transportation dollars are limited to address our many transportation demands, and we value PAG's work in trying to leverage new dollars in collaboration with its members and others as well.

Thank you for this opportunity to share our support for the collaborative solutions that PAG brings to the regional table. We hope to see PAG earn its recertification and continue to be a valuable resource to AARP's members.

Comment 20:

In the other cities I have lived and worked in I have seen the collaborative nature of the MPO's interactions with the communities they serve. I have also been fortunate to meet staff from MPO's across the country at conferences, seminars, and training sessions. I have learned about their community engagement strategies and the wide range of opportunities for public participation.

In recent years, I am sorry to say that PAG does not resemble those cities or MPOs, because it has drastically reduced the opportunity for the public to participate in the planning process. There is little to no community engagement except when required, such as a public hearing or open house for a new plan or the TIP. There is no active recruitment of residents for PAG committees. EPAC has multiple openings for citizen representatives, which are going unfilled. Even learning how to participate in the PAG certification process was problematic and required multiple inquiries to FHWA. I never received a notice from PAG, nor was one posted on the website.

The TIP development process in May 2021 is a good example of the limited public participation in the planning process. PAG held two virtual open houses, a 30 day comment period and a public hearing as required. The public hearing was held during the Regional Council meeting where the Regional Council was scheduled to take action on approving the TIP. This would indicate that any comments submitted during the public hearing would be given little consideration, since a vote was to follow immediately after the hearing.

During the 30 day comment period, 64 people submitted comments. That is a huge increase from the two comments submitted for the prior TIP and shows an engaged, knowledgeable community. However, PAG made absolutely no changes to the TIP as a result of those

comments. I submitted comments on the TIP and got a very unsatisfactory response. It did not address my concerns directly, nor answer the many questions I submitted. PAG complied with the minimal requirements of the law by collecting public comments, but failed to comply with the intent of the law by not listening and seriously considering the public's commentary on the TIP.

Comment 21:

Thank you for this opportunity to submit comments and documentation regarding the federal certification of Pima Association of Governments (PAG) MPO here in Pima County, Arizona.

My experience with PAG began in the early 2000s when then Tucson Mayor Bob Walkup brought vision and community mandates to his role in leading PAG and initiating the Regional Transportation Authority which is administered by PAG. As a citizen and past-chair of the Tucson-Pima Metropolitan Energy Commission I worked on PAG's Strategic Energy Plan in 2006 which called for a broad phase-in of "electrification of transportation," now called "mobility and access."

Mayor Walkup took the top results of City-wide forums calling for "better alternatives to automobile transportation" combined with his passion for electric vehicles and electric public transit and led the RTA to pass the breakthrough Regional Transportation Plan in 2006. This Plan brought a highly successful Modern Streetcar project to central Tucson and greatly expanded bus service and infrastructure for pedestrian and bicycle mobility. But as the Great Recession, driving behavior, and land-use changed many of the assumptions in the 2006 Plan, there was strong resistance to adapt to change and continue to embrace Walkup's visionary leadership. And now that social equity and the climate crisis are a priority at every level of government, including the Bipartisan Infrastructure Law, PAG continues to resist adapting to change.

In particular, since 2013 the leadership of Executive Director Farhad Moghimi (supported by the PAG/RTA Board) has widely limited public engagement on key public infrastructure issues and continues to bias road-widening projects in allocating regional funds.

The region's population growth rate has slowed significantly compared to previous decades and land-use patterns have become much more urbanized. City of Tucson residents are the majority in the region, provide 60% of RTA funding, and bear at least 70% of the use of public infrastructure burden in the region. And yet, PAG/RTA continues to push suburban solutions to a community which has voiced strong demand for urban solutions. The growing alienation of

Tucson voters to any future 20-year RTA plans threatens both election failure and lost opportunities for effective and sustainable regional solutions. The inability of the PAG/RTA Board to foster positive change is underscored by the fact they have not even conducted an open performance evaluation of the Director for many years.

My interest in the climate/energy transportation issues has been prominent in my requests to the PAG/RTA Board over many years. But I can say along with many of my fellow citizens that I have never been responded to including this comment I wrote in 2021 for the last 2045 Long-Range Transportation Plan:

“Don’t be fooled by PAG’s deceptive public relations

The Pima Association of Governments’ current public relations campaign to sell people on voting another Regional Transportation Authority sales tax increase implies PAG/RTA’s planning is leading the region to a climate friendly future.

PAG’s Draft 2022-2026 Transportation Improvement Plan includes the statement that “air quality for our region is being tracked, and the amount of emissions from vehicles and other on-road sources are decreasing at a rapid pace, putting the region on track to achieve all 2045 Regional Mobility and Access Plan targets.”

In 2009 the Environmental Protection Agency formally stated that greenhouse gases (GHG) were a public threat. But at the time it did not incorporate them in the National Ambient Air Quality Standards (NAAQS) which apply to transportation-related pollutants: ozone, carbon monoxide, nitrogen dioxide, and specific size particles.

Since these transportation standards do not apply to GHGs carbon dioxide and methane, PAG doesn’t have to show federal conformity regarding these climate-changing emissions. This loop hole appears in how PAG conflates what they call Air Quality Assessment with what they label as “tracking overall GHG emissions.”

PAG’s Air Quality Assessment positioned under a graph depicting projected GHG declines to 2045 includes information on the NAAQS gases but none on GHGs. The so-called “tracking” of GHGs shown in the graph is not from measuring actual gases but based on computer simulations used to produce the periodic PAG Regional Greenhouse Gas Inventory. Leaked emissions of methane from natural gas production and distribution are not covered in the PAG GHG Inventory.

Methane is an extremely powerful greenhouse gas, responsible for roughly 30 per cent of warming since the pre-industrial era. In the first 20 years after release, methane is more than 80 times more powerful as a heat-trapping gas than carbon dioxide, justifying its reputation as a “global warming multiplier.”

The oil and gas industry is responsible for approximately half of overall methane emissions. A recent UN study finds that cutting methane is the strongest lever we have to slow climate change over the next 25 years and complements necessary efforts to reduce carbon dioxide. PAG’s transportation plans which tout natural gas (methane) burning engines and electric vehicles powered by fossil fuel-based electricity are indirectly promoting more methane emissions.

Even setting the methane issue aside, PAG’s own 25-year projection of on-road transportation emissions shows that by 2045 our region would still be generating 88% of 2020 GHGs.

Currently, in order to avoid the worst climate consequences, the broad scientific consensus is we have to bring GHG emissions down to zero between 2030 and 2050. There in plain view is the disconnect between PAG/RTA planning and the City and County’s commitment to the Paris Climate Agreement as recorded in their respective Climate Emergency Resolutions.

The scariest part of this existential crisis: There is presently no scalable corrective means except ending carbon emissions as the climate progresses toward an increasingly hotter, unlivable planet. If there is to be hope, the jurisdictions, with or without the RTA, will have to craft real solutions to the climate challenge soon, not illusory plans.

Robert Cook

Three-term current member, Pima County Planning and Zoning Commission

Two-term past member, RTA Citizens’ Accountability for Regional Transportation Committee

Past Chair, Tucson-Pima Metropolitan Energy Commission”

In the last two years, I wrote two Guest Opinions concerning PAG/RTA published in the Arizona Daily Star, our local newspaper. You can access these at:

https://tucson.com/opinion/local/tucson-opinion-the-2006-regional-transportation-authority-is-%20the-past-not-the-future/article_d66dc39c-bdbf-11eb-9dc8-8bbdf5d92032.html

https://tucson.com/opinion/local/local-opinion-the-rta-is-not-the-city-s-only-option/article_8c63e6fe-7d50-11ec-8f33-bf169e9c3320.html

In conclusion, without fundamental change in the leadership and direction of PAG/RTA, it is my belief that the City of Tucson is better off withdrawing support of any future RTA planning and funding and continuing to pursue its own planning which in the past five years has been exemplary. Move Tucson is oriented to a resilient and sustainable future and should be the framework for a regional vision going forward.

APPENDIX D – LIST OF ACRONYMS

3C: Continuing, cooperative, and comprehensive
ADA: Americans with Disabilities Act
ADOT: Arizona Department of Transportation
AMPO: Association of Metropolitan Planning Organizations
BIL: Bipartisan Infrastructure Law (Infrastructure Investment and Jobs Act)
CAA: Clean Air Act
CFR: Code of Federal Regulations
CMP: Congestion Management Process
CO: Carbon Monoxide
CRFC: Critical Rural Freight Corridor
CUFC: Critical Urban Freight Corridor
DOT: Department of Transportation
EJ: Environmental Justice
FAST: Fixing America’s Surface Transportation Act
FHWA: Federal Highway Administration
FTA: Federal Transit Administration
FY: Fiscal Year
HSIP: Highway Safety Improvement Program
ITS: Intelligent Transportation Systems
LEP: Limited-English-Proficiency
MAP-21: Moving Ahead for Progress in the 21st Century
MPA: Metropolitan Planning Area
MPO: Metropolitan Planning Organization
NHFN: National Highway Freight Network
PAG: Pima Association of Governments
PM10: Particulate Matter
RMAP: Regional Mobility and Accessibility Plan
RTA: Regional Transportation Authority
RTP: Regional Transportation Plan
NO₂: Nitrogen Dioxide
SAFETEA-LU: Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users
SHSP: Strategic Highway Safety Plan
STIP: State Transportation Improvement Program
TDM: Travel Demand Management
TIP: Transportation Improvement Program

TMA: Transportation Management Area

U.S.C.: United States Code

UPWP: Unified Planning Work Program

USDOT: United States Department of Transportation



U.S. Department
of Transportation

Federal Highway Administration

[Arizona Division](#)

4000 N Central Ave, Ste 1500
Phoenix, AZ 85012-3500
(602) 379-3646 – Main
(602) 382-8998 – FAX

Federal Transit Administration

[Region IX](#)

90 7th St, Ste 15-300
San Francisco, CA 94103
(415) 734-9490 – Main
(415) 734-9489 – FAX

September 11, 2023

In Reply Refer To:

(TRAP 19 – MPO)

Pima Association of Governments MPO
Federal Certification Review

Via e-mail: fmoghimi@pagregion.com

Mr. Farhad Moghimi, Executive Director
Pima Association of Governments
1 East Broadway, Suite 401
Tucson, Arizona 85701

Dear Mr. Moghimi:

The Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) jointly conducted a certification review of the transportation planning process for the Pima Association of Governments on April 18, 2023. Planning certification reviews are conducted per 23 USC 134 and 49 USC 5303, which require a review of the transportation planning process for all urbanized areas with population greater than 200,000 at least every four years. The objective of the review is to determine whether the metropolitan transportation planning process meets the Federal requirements.

Following the April 18, 2023 site visit, FHWA and FTA preliminarily certified PAG as having met the Federal requirements. Upon review of numerous public and stakeholder comments that FHWA and FTA received in conjunction with the certification review in April and May 2023, the agencies opted to maintain the certification of the transportation planning process for the Pima Association of Governments. That certification remains valid until June 25, 2027.

Enclosed for your information is the final MPO Certification Review Report that documents the various components of the FHWA/FTA certification review of the Pima Association of Governments.

If you have questions about the certification review process, please contact Mr. Romare Truely of FHWA Arizona Division at (602) 382-8978 or romare.truely@dot.gov; or Ms. Arianna Valle of FTA Region IX at (602) 382-8967 or arianna.valle@dot.gov.

Sincerely,

Karla S. Petty
Division Administrator
FHWA Arizona Division

Ray Tellis
Regional Administrator
FTA Region IX

APPENDIX F – PAG RESPONSE LETTER

Included in following pages:

- Letter from PAG Executive Director to FHWA and FTA
- PAG Responses to Recommendations from FHWA and FTA
- Resolution of Support
 - Tucson Metro Chamber
 - Southern Arizona Home Builders Association
 - Association of General Contractors, Arizona Chapter
 - Oro Valley Chamber
 - Arizona Transportation Builders Association
 - Greater Vail Area Chamber of Commerce
- Confirmation of PAG's Policy Against Discrimination, Harassment and Retaliation
- Policy Reminder Memo from PAG Executive Director to PAG staff

September 5, 2023

Mr. Romare Truely, Community Planner
Federal Highway Administration – Arizona Division
4000 N. Central Ave., Ste. 1500
Phoenix, Arizona 85012
Romare.Truely@dot.gov

Dear Mr. Truely:

I am writing to extend my gratitude for the diligent effort put forth by the Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) team in conducting the federal certification review and desk audit of our planning process at Pima Association of Governments (PAG) on April 18, 2023. We sincerely appreciate the valuable insights and recommendations provided by your organizations.

We are pleased to acknowledge that your thorough examination has resulted in a list of commendations, which recognizes our team's dedication and hard work. These commendations serve as a motivation for all of us at PAG to continue our commitment to excellence and to uphold the highest standards in regional governance and transportation planning.

Furthermore, we understand the significance of the recommendations made by the FHWA and FTA. We view them as essential guidelines that will help us enhance our planning process further and ensure that we are better equipped to meet the transportation needs of the community we serve. Your input is invaluable to us, and we are already working diligently to incorporate your suggestions into our strategies and procedures.

We appreciate the recommendations and consider them as opportunities for enhancing our process to align better with federal objectives. Our specific response to each recommendation is attached to this letter. We are confident that, with your support and guidance, we can implement these recommendations.

Once again, we express our gratitude for the time and effort invested by the FHWA and FTA in conducting the review and providing us with these valuable insights.

Our Regional Council's commitment to promoting excellence in regional governance and collaborative regional decision-making is truly commendable, and as an agency we are dedicated to implementing these recommendations promptly and effectively. We look forward to your continued partnership and collaboration to create a well-integrated and sustainable transportation system that benefits our region.

If you have any further questions or require additional information, please do not hesitate to contact me. Thank you again for your invaluable support.

Sincerely,



Farhad Moghimi
Executive Director

cc: Karla Petty, FHWA
Ray Tellis, FTA
Amy Changchien, FTA
Anthony Sarhan, FHWA
Alan Hansen, FHWA
Mervin Acebo, FTA
Arianna Valle, FTA
Dave Adler, PAG
Shelia Storm, PAG
Jamie Brown, PAG
Jeanette DeRenne, PAG

Attachment: PAG responses to FHWA and FTA recommendations

PAG 2023 Federal Certification Review
PAG Responses to Recommendations from FHWA and FTA

FHWA/FTA Recommendation 1:

The federal team encourages PAG to ensure that regional transportation investments are multimodal, not favoring the movement of single-occupancy vehicles over alternative forms of transportation.

PAG Response:

Transportation needs in the PAG region are substantial, and PAG's goal continues to be to address the diverse needs of system users through implementation of multimodal transportation improvements. PAG's unwavering mission is to champion collaborative regional governance to best apply our region's available, but extremely limited transportation funding sources. A commitment to collaborative regional governance to achieve this goal is evident through an extremely strong track record of over 95% unanimous decisions made by the Regional Council on vital matters.

As we develop a public-driven, legislatively authorized 20-year regional transportation plan and sales tax initiatives for voter consideration, the decision-making power to secure Regional Transportation Authority continued funding for another 20 years ultimately rests with the voters. This flexible regional resource allocation is guided by public input to ensure success at the ballot. A successful outcome will result in more than \$2.3 billion of supplemental regional transportation funding.

PAG and the RTA, as regional organizations, are legally bound to embrace and respect the wishes of Pima County voters. The 2006-voter approved multimodal plan stands as an example of a regionally balanced, long-term investment strategy. Project scopes of RTA plan corridor improvements address needs for all transportation modes, leaving no one behind.

In addition to the multimodal corridor improvements, the RTA plan addresses much-needed transit and safety enhancements across the region. Safety enhancements include dedicated investments in bicycle and pedestrian infrastructure.

PAG's federally mandated long-range transportation plan (the Regional Mobility and Accessibility Plan, or RMAP) and unanimously adopted Long-Range Regional Transit Plan further reinforce PAG's unwavering commitment to aligning all regional

investments with the desires of the public, based on their input during the development of both planning documents.

Additionally, PAG uses its performance-based planning strategies for regional planning decisions and to guide investment decisions in a variety of areas including safety, pavement condition and travel times. The unanimous adoption of these updated plans in 2020 by the PAG Regional Council exemplifies the dedication to keeping regional transportation investments multimodal and impartial, refusing to show any favoritism toward any specific mode of transportation.

With PAG's successful record of working with diverse stakeholders and garnering overwhelming support for its voter initiative, the region can forge ahead with a high level of confidence in building a transportation system that truly serves and reflects the wishes of its people. (see attached letters of support for RTA Next development)

FHWA/FTA Recommendation 2:

PAG's transit performance measures should be made publicly accessible, including transit asset management and transit safety in the RTP and TIP development/update process.

PAG Response:

Several transit performance measures have been made publicly accessible through inclusion within the long-range transportation plan (i.e., RMAP) and the Transportation Improvement Program (TIP). The 2045 RMAP Update, unanimously adopted in September 2020 and the FY 2022 – FY 2026 TIP, unanimously approved in May 2021, include the following four transit-specific performance measures: Total Transit Trip, Average Transit Travel Time, Average Transit Speed, and Regional Jobs Reachable by Transit within 45 minutes. Additionally, two other performance measures address transit, including (1) Walk, Bike, or Transit to Work Rate and (2) Walk, Bike, and Transit Mode Share, All Trips. For each of these six performance measures, the tables within the RMAP and TIP include the 2015 baseline, current data, 2020 benchmark, 2025 benchmark, 2045 target, desired trend, and status. This information is publicly accessible within each of these documents, which are published on the PAG website. Moreover, as the RMAP and TIP are updated, this information will continue to be publicly accessible within the documents and as part of the public participation process.

For transit asset management and transit safety, we will take the necessary steps to incorporate these additional transit performance measures into our comprehensive performance measures dashboard and are committed to ensuring public access through our existing reporting channels. Adding transit performance to the dashboard will further expand our robust system for tracking and evaluating the performance of our transit services as part of our overall transportation planning and programming efforts.

FHWA/FTA Recommendation 3:

The federal team encourages PAG to continue enhancing public involvement and engagement opportunities for citizen participation in the regional transportation planning process by updating its Public Involvement Policy to include Virtual Public Involvement strategies, as well as demonstrating adequate and timely consideration and response to public input.

PAG Response:

As public outreach tools and techniques are constantly evolving, PAG staff consistently explore and apply new techniques, such as virtual or hybrid public involvement, and looks to incorporate effective transportation survey tools, such as MetroQuest, into the input process. PAG continues its commitment to broad outreach as part of the current long-range transportation planning process to ensure that individuals leading busy lives have ample opportunities to participate to ensure diverse engagement and participation. We anticipate opportunities for peer exchanges with partner agencies to learn and share best practices, innovative ideas and collaborative opportunities. Finally, staff members are reviewing the recommended public involvement best practices documents, such as the TPB Participation Plan Implementation Evaluation Report, etc.

Additionally, we have successfully integrated Virtual Public Involvement strategies into our public participation activities, as allowed through the flexibility of the adopted Public Involvement Policy. This policy enables subset public participation plans to be customized to be responsive to evolving public participation platforms, including to offer new virtual public involvement options to the mix of expansive traditional participation methods. PAG conducted a virtual open house for the FY 2022-FY 2026 TIP update in 2021 with an increase in attendance via the webinar compared to prior in-person open houses.

During the COVID-19 pandemic, a notable instance of our flexibility was demonstrated starting in 2020. To ensure continuous public access to all our public meetings, we swiftly adopted virtual public participation measures. By offering this digital platform, we

not only improved accessibility but also enabled a broader range of people the opportunity to engage and contribute to the transportation planning process, regardless of their physical location or constraints. Moreover, the shift to digital platforms enables PAG to maintain an audio/video archive of all meetings on the internet. This allows anyone who may have missed a meeting to stay informed by watching the meeting at a later time at their convenience. This process also included opportunities to submit written comments in advance of the meetings and people also had the option to call in during Regional Council meetings to participate in an online call to the audience.

This established practice of virtual public involvement has been successful, and virtual methods will be incorporated into all public participation plans moving forward as another public participation option to obtain input or feedback.

PAG will continue to demonstrate its long-established practices of being responsive in a timely fashion to requests for relevant information.

FHWA/FTA Recommendation 4:

The federal team encourages PAG to review its processes to enhance coordination and transparency with committees and member agencies.

PAG Response:

PAG's mission is dedicated to fostering collaborative regional governance and member coordination to ensure a transparent process. This commitment is demonstrated by the overwhelming support of over 95% unanimous decisions made by the PAG Regional Council on significant matters (i.e., RMAP, TIP, etc.) over the last ten years.

Although, on rare occasions, there might be a few issues that do not receive unanimous approval, we ensure that all recommendations are presented to the Regional Council with meticulous detail for thorough discussion and consideration.

Our primary aim is to achieve consensus at all stages of our collaborative process through information sharing and open and honest dialogue. However, it's possible for one or two committee members to find themselves at odds with the majority.

Additionally, it's crucial to highlight that in recent years, we've welcomed numerous new members to the committees who might not be well-versed in the various rules and regulations. It's even more important to emphasize that the Regional Transportation

Authority (RTA) operates as a special taxing district, and the allocation and utilization of RTA funds are governed by specific state statutes and a voter-approved plan. These guidelines are distinct from the Metropolitan Planning Organization (MPO)-related Transportation Improvement Program (TIP) programming of funds or long-range transportation plan (i.e., the RMAP) development processes.

Transparency is a fundamental principle that we follow and prioritize. Our Meeting and Events page provides public and committee access to each meeting via our calendar which contains the agendas, meeting summaries and meeting packets. The Meetings and Events page also includes a link to our Meeting and Administrative Documents library for access to all committee information, which is searchable by committee name and year. During the actual meetings, the public may view and listen to the meetings via live streaming on YouTube. During the meeting, this live stream link can be accessed directly from the Meeting and Events page or via the meeting agenda link.

In strict adherence to the Arizona open meeting law, we record all committee meetings, and these recordings serve as the official minutes. Links to the video/audio are made available via each committee agenda and detailed information is available on the agenda regarding the availability of the audio recording. We also post legal action reports for committees as required by law. For further transparency, we provide meeting summaries in the meeting packets for subsequent public meetings, and these are posted online once the committee has reviewed a summary to rectify any concerns, if needed, and then approves it.

Regrettably, an alarming trend has emerged in our society in recent years, where a small number of dissenting committee members persistently undermine the collaborative process in an attempt to influence others. This behavior contradicts our democratic procedures and presents a new challenge we are attempting to address in order to maintain focus on the larger goal of data-driven transportation planning and adequate and broad-based public participation to ensure effective outcomes for all.

In our assessment, these individuals are part of the bigger societal challenges we are facing at all levels of debate where some individuals are not willing to accept the rules of engagement and are not respectful of our civil discourse process. In this very unusual atmosphere of discourse in our nation and our region, we are continuing to address misinformation, disinformation and false narratives by presenting factual information and providing reminders of policy and regulatory information on a continuous basis.

In some instances, individual committee members have violated PAG's rules of conduct or the open meeting law by choosing not to follow the guidance provided by PAG staff.

Following the rules of conduct and the open meeting law are mandatory requirements for all committee members.

As a response to these violations, appropriate actions have been authorized by our governing board and taken to ensure compliance with the laws and regulations related to participation on our committees.

Upholding the integrity of our process is of utmost importance to us so that we can develop plans with adequate time for regional public participation. Holding these individual committee members accountable has been challenging and has caused retaliatory actions by these committee members and others. (See memo attached from the Chairman of the PAG Regional Council)

FHWA/FTA Recommendation 5:

PAG should consult with ADOT in the development of Arizona's Vulnerable Road User Safety Assessment. 23 USC 148(1)(4)(B) requires states to consult with local governments and metropolitan planning organizations (MPOs), and regional transportation planning organizations that represent a high-risk area for vulnerable road users (bicyclists, pedestrians, etc.).

PAG Response:

We acknowledge that the state takes the lead in this effort, and we will support ADOT accordingly. PAG's current Safety Assessment was adopted by the PAG Regional Council in 2016 and can be utilized to provide input.



Resolution of Support for a New RTA Plan

April 6, 2023

The Tucson Metro Chamber is committed to working with the Regional Transportation Authority (RTA) of Pima County to build support for the plan development and voter approval of a new 20-year, \$2.3 billion regional transportation plan initiative.

This new investment in regional transportation improvements would benefit the region's long-term economic vitality by improving regional mobility and accessibility to enhance the region's quality of life, business climate, and future growth and development. A new RTA plan will build on the transparent and accountable governance of the RTA through continued regional collaboration.

The Chamber believes all governing bodies must continue to respect the will of the voters and honor voter promises made in the past or in the future, and a successful regional transportation plan can only be achieved through sincere unity on common ground and consensus of desired outcomes.

To successfully compete for future economic development opportunities, which can bring quality jobs and ongoing revenue to all communities in our region, we believe the RTA is a critical and flexible transportation funding source all regional stakeholders should support to meet our ongoing transportation needs.

As an organization that represents 1,400 businesses employing more than 160,000 employees in Tucson and Pima County, the Chamber supports the development of a new RTA plan to enhance the prosperity of our region, including the transportation and business communities.

A handwritten signature in black ink, reading "Michael Guymon", with a long horizontal flourish extending to the right.

Michael Guymon
President & CEO



**Southern Arizona
Home Builders
Association**

2840 N. Country Club Rd.
Tucson, AZ 85716
P: 520.795.5114
www.sahba.org

PRESIDENT & CEO

David M. Godlewski

EXECUTIVE OFFICERS

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Randy Agron
A.F. Sterling Homes

Immediate Past Chair

Michael Del Castillo
Richmond American Homes

Affiliated With



RESOLUTION IN SUPPORT OF REGIONAL TRANSPORTATION

April 20, 2023

Since its voter approved creation in 2006, the Regional Transportation Authority has proven to be a model for the benefits that can be achieved through regional cooperation and coordination. To date, nearly 930 projects and services have been delivered for our communities.

Safe and efficient surface mobility infrastructure is critical to both economic development and quality of life in our region. Therefore, it is essential that our region has a plan in place to bolster progress made so far and assure that the infrastructure necessary to accommodate future needs can be completed in a timely and effective manner.

The Southern Arizona Homebuilders Association strongly supports the development of a new RTA plan that will improve the conditions of existing roadways, provide efficient cross town travel options, reduce congestion and improve safety for all our residents. Such a collaborative approach to infrastructure planning is critical to our collective prosperity and success.

David M. Godlewski
President & CEO



Resolution of Support

for



New Regional Transportation Authority (RTA) Plan

WHEREAS, reliable transportation infrastructure safely and efficiently move people and goods, and attract new business investment and jobs to the region; and

WHEREAS, since 2006 the voter-approved half-cent sales tax resulted in more than \$1.4 billion in RTA economic investments in the greater Tucson region to date; and

WHEREAS, the public and private sectors infused another \$1 billion-plus into the region's economy for related infrastructure improvements; and

WHEREAS, the RTA sales tax provides the largest amount of funding for transportation improvements; and

WHEREAS, the region continues to require capacity, operational enhancements and multimodal connectivity improvements; and

WHEREAS, the RTA has demonstrated transparency, accountability and proven methods for project delivery to date, as validated in both its 10-year and 15-year state-mandated, independent performance audits.

NOW, THEREFORE, The Board of Directors of the *Arizona Chapter of the Associated General Contractors of America, Inc.* (AZAGC) unanimously support the RTA of Pima County's proposal to seek voter approval of a new 20-year regional transportation plan that will:

- Benefit the region's long-term economic vitality by improving regional mobility and accessibility to enhance the region's quality of life, business climate, and future growth and development.
- Build on the transparent and accountable governance of the RTA through long-established regional collaboration.
- Continue to respect the will of the voters and honor voter promises made in the past or in the future.
- Enhance the prosperity of all communities in our region, including the region's transportation and business stakeholders.

Adopted April 26, 2023



Chair
Eric Renaud
*Pima Federal Credit
Union*

Vice Chair
Jeremy Thompson
Cox

Secretary / Clerk
Dinny Cosyns
NorthStar Strategies

Treasurer
Ron Arenas
*Picture Rocks Cooling,
Heating and Plumbing*

**Executive Committee
Member**
Susan Swan
Swan Pilates

Directors

Lisa Bayless
Long Realty

Zoe Burcham
Kinghorn Law / Financial

Michael Burns
Red Coyote Services

Lydia Camarillo
Golder Ranch Fire District

Shelby Francom
*El Conquistador Tucson,
A Hilton Resort*

Tom Hebner
*Roche Tissue
Diagnostics*

Cameron Lewis
*Northwest Healthcare /
Oro Valley Hospital*

Kelly Palmiero
Sierra Tucson

Robert Ramirez
Robert V. Ramirez CPA

Jack Talmage
Oro Valley Country Club

Paul Tees
*Commerce Bank of
Arizona*

Dan Wesson
The Post Workspaces

Ex-officio
Paul Melcher
Town of Oro Valley

May 4, 2023

Pima County Board of Supervisors:

The Oro Valley Chamber of Commerce is committed to working with the **Regional Transportation Authority** (RTA) of Pima County to build support for plan development and voter approval of a new 20-year, \$2.3 billion regional transportation plan initiative.

This new investment in regional transportation improvements would benefit the region's **long-term economic vitality** by improving regional mobility and accessibility to enhance the region's quality of life, business climate, and future growth and development. A new RTA plan and tax will build on the **transparent** and **accountable** governance of the RTA through long-established regional collaboration.

A successful regional transportation plan can only be achieved through **sincere unity** on common ground and consensus of desired outcomes.

To successfully compete for future economic development opportunities, which can bring **quality jobs** and **long-term revenue** to **all communities in our region**, the RTA is a **critical** and flexible transportation funding source all regional stakeholders should support to meet our ongoing transportation needs.

As an organization financially vested in the region, we support development of a new RTA plan to enhance the prosperity of all communities in our region, including the region's transportation and business stakeholders.

Kristen Sharp
President / CEO
Greater Oro Valley Chamber of Commerce



Arizona Transportation Builders Association

1842 West Grant Road, Suite 103 • Tucson, AZ 85745
(p) 520.623.0444 • www.MovingOurEconomy.org

Arizona Transportation Builders Association is committed to working with the Regional Transportation Authority (RTA) of Pima County to build support for plan development and voter approval of a new 20-year, \$2.3 billion regional transportation plan initiative.

Regional transportation improvements will be supported by continued funding and would benefit the region's long-term economic vitality by improving regional mobility and accessibility to enhance the region's quality of life, business climate, and future growth and development. A new RTA plan and continued tax will build on the transparent and accountable governance of the RTA through long-established regional collaboration.

We believe all governing bodies must continue to respect the will of the voters and honor promises made in the past and the future.

We believe a successful regional transportation plan can only be achieved through sincere unity on common ground and consensus of desired outcomes.

We believe that to successfully compete for future economic development opportunities, which can bring quality jobs and long-term revenue to all communities in our region, the RTA is a critical and flexible transportation funding source all regional stakeholders should support to meet our ongoing transportation needs.

As an organization financially vested in the region, we support development of a new RTA plan to enhance the prosperity of all communities in our region, including the region's transportation and business stakeholders.



The Greater Vail Area Chamber of Commerce (GVACC) expresses its support for the passage of RTA Next and encourages diverse stakeholders with varied interests to come together to support this vital initiative. We all know the transportation needs of our region far exceed our available resources. Together, we have an opportunity to unite and provide the funding for our transportation future. RTA Next will directly and indirectly benefit our community, local businesses, and residents alike.

The Greater Vail Area, situated in southeast Pima County, is a rapidly growing and dynamic region. **In the last 20 years, the Vail Census Designated Place (CDP) grew by over 500%** ([see attached table](#)). RTA Next represents regional transportation investment for the next 25 years. The southeast and Greater Vail Area will continue to grow. With two new hospitals along Houghton Road, several existing major employment campuses, thousands of acres of planned state land, and logistics and manufacturing companies evaluating the southeast; RTA Next is a significant opportunity to support critical roadways in the southeast region necessary to create a more connected and accessible community. ([see attached list of southeast roadways](#)) In addition to roadway connectivity, the growing southeast area employers, hospitals and schools need additional and expanded transit routes, additional numbers of stops and increased frequency of service. Current routes do not go beyond Houghton Rd. (Routes 450, 7, 9, 17, 4 and 108X) ([see attached map](#)). The southeast is a regional asset, serving central Tucson, the urban core, southwest, and northern area.

One of the key advantages of RTA Next is its focus on a multimodal approach. By integrating various transportation modes such as new and improved roads, expanded bus services, enhanced pedestrian and cycling infrastructure, we can create a more balanced and accessible transportation system. This will not only benefit our residents but also foster an environment conducive to economic growth and one attractive to businesses in the area. GVACC is committed to fostering a vibrant and prosperous business environment in our region and understands the importance of efficient transportation infrastructure for enhancing economic growth and improving quality of life for our residents.

Moreover, the passage of RTA Next will bolster our reputation as a forward-thinking and progressive community. By investing in modern transportation solutions, we demonstrate our commitment to embracing innovation and improving the overall livability of our region. This will undoubtedly attract talented professionals, entrepreneurs, and businesses that seek a community with our quality of life and future focus.

As the voice of the southeast business community, and their employee and customer families, GVACC knows the passage of RTA Next is essential. We urge those charged with developing the final RTA Next plan to consider the needs of growth areas in the next 25 years. We urge all members of our community, including public officials, residents, and businesses, to recognize the benefits that this initiative will bring. Together, we can shape a better future for the Greater Vail Area, driving economic growth, enhancing connectivity, and improving the overall quality of life for current and future residents and businesses.

Regional Infrastructure Planning - U.S. CENSUS POPULATION GROWTH RATE BY DECADE								
	2000 Pop.	2010 Pop.	2000-2010 Growth Rate	2010 Pop.	2020 Pop.	2010-2020 Growth Rate	2000-2020 Growth Rate	2000-2020 Net Pop. Increase
Tucson	486591	520116	6.89%	520116	542629	4.33%	11.52%	56,038
South Tucson	5490	5652	2.95%	5652	4613	-18.38%	-15.97%	-877
Oro Valley	29662	41011	38.26%	41011	47070	14.77%	58.69%	17,408
Marana	13443	34961	160.07%	34961	51908	48.47%	286.13%	38,465
Sahuarita	3242	25259	679.12%	25259	34134	35.14%	952.87%	30,892
Pima County NW CDPs	13087	15613	19.30%	15613	15120	-3.16%	15.53%	2,033
Picture Rocks	7976	9563	19.90%	9563	9551	-0.13%	19.75%	1,575
Avra Valley	5111	6050	18.37%	6050	5569	-7.95%	8.96%	458
Pima County SW CDPs	41305	54877	32.86%	54877	58877	7.29%	42.54%	17,572
Tucson Estates	9915	12192	0.00%	12192	12069	-1.01%	21.72%	2,154
Drexel Heights	23691	27749	17.13%	27749	27523	-0.81%	16.17%	3,832
Valencia West	2451	9355	281.68%	9355	14101	50.73%	475.32%	11,650
Three Points	5248	5581	6.35%	5581	5184	-7.11%	-1.22%	-64
Pima County NE CDPs	146269	158480	8.35%	158480	162832	2.75%	11.32%	16,563
Flowing Wells	15071	16419	8.94%	16419	15657	-4.64%	3.89%	586
Casas Adobes	53897	66795	23.93%	66795	70973	6.25%	31.68%	17,076
Catalina	7182	7569	5.39%	7569	7551	-0.24%	5.14%	369
Catalina Foothills	53560	50796	-5.16%	50796	52401	3.16%	-2.16%	-1,159
Tanque Verde	16559	16901	2.07%	16901	16250	-3.85%	-1.87%	-309
Pima County SE CDPs	23572	47,785	102.72%	47,785	55,796	16.76%	136.70%	32,224
Rincon Valley	N/A	5,139	0.00%	5,139	5,612	9.20%	N/A	N/A
Vail	2164	10208	4	10208	13604	33.27%	528.65%	11,440
Corona de Tucson	800	5675	6	5675	9240	62.82%	1055.00%	8,440
Summit	3274	5372	1	5372	4724	-12.06%	44.29%	1,450
Green Valley	17334	21391	0	21391	22616	5.73%	30.47%	5,282
Pima County All	843746	980263	16.18%	980263	1043433	6.44%	23.67%	199,687

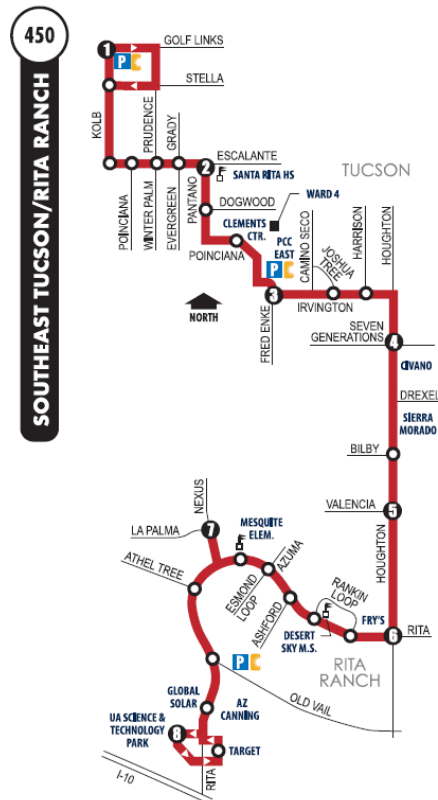
SOUTHEAST PIMA COUNTY CRITICAL ROADWAYS

- Aerospace Parkway
- Alvernon Way
- Andrada Rd
- Brekke Rd
- Camino Loma Alta
- Colossal Cave Rd
- Dawn Rd
- Escalante Rd
- Freeman Rd
- Wentworth Rd
- Harrison Rd
- Houghton Rd
- Irvington St
- I-19 Hwy
- Kolb Rd
- Los Reales Rd
- March Station
- Mary Ann Cleveland
- Melpomene Way
- Wilmot Rd
- Old Nogales Hwy
- Old Spanish Trail
- Pistol Hill Rd
- Sahuarita Rd
- Sonoita Hwy
- Sonoran Corridor
- Swan Rd
- Tanque Verde
- Valencia Rd

Sun-Tran Transit Map



Bus Route 450



To: All PAG employees

From: Mayor Joe Winfield 
PAG Chairman

Cc: PAG Regional Council
Thomas Benavidez

Re: Confirmation of PAG's Policy Against Discrimination, Harassment and Retaliation

Date: November 10, 2022

As a follow up to the Executive Director's memo attached dated October,17, 2022, PAG has a responsibility to cooperate with state and federal authorities as deemed appropriate and necessary by our legal advisors to adhere to relevant requirements from the agreements between PAG and ADOT and by extension FTA or FHWA, or provide ADOT with relevant information, data, or reports to aid in ADOT's compliance.

This Memorandum shall serve as a reminder that PAG is committed to maintaining high standards of conduct and prohibits adverse actions against all employees who engage in lawfully protected activity in good faith. As stated in PAG's Policy Against Discrimination, Harassment and Retaliation.

PAG's Rules of Conduct requires PAG employees and Regional Council members, as representatives of PAG, to observe high standards of conduct and personal ethics in the conduct of their duties and responsibilities. PAG employees, Regional Council members and committee members must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws, regulations, and contracts.

This includes that PAG acts to comply with all applicable laws to ensure that all of our employees are afforded their legal rights and protections. PAG's policy is clear. A protected activity includes opposing, in good faith, any practices prohibited by state and federal law or public policy by making a formal or informal good faith complaint about or reporting discriminatory, harassing, or retaliatory activity, testifying, assisting, or participating in any manner in an investigation, proceeding or hearing relating to discrimination, harassment, retaliation, or any other practice prohibited by law and PAG's policy.

Accordingly, employees who cooperate in good faith are protected. PAG will take all reasonable steps to protect against any and all retaliation on this basis or for any other reason prohibited by law.

Please remember to help PAG ensure that its employees are protected, it is the responsibility of all Regional Council members, committee members and employees to comply with and to report violations or suspected violations of the Rules of Conduct, PAG policies, or laws in accordance with PAG's policy.

This includes actions by PAG Regional Council members, employees, or third parties.

Our employees are critical to the success of PAG, and we owe it to you to make sure that you are afforded your legal rights at work. If you have any questions or want to discuss any of this, please let me know.

MEMO

TO: PAG Staff

FROM: Farhad Moghimi
Executive Director



DATE: October 17, 2022

SUBJECT: Policy Reminder

In the last few years, we have all seen how the tone and tenor of public discourse has changed in society and at all levels of government. Most noticeably, facts and truths are often dismissed in favor of conveying opinions and preferences.

Closer to home, we have heard hostile comments and abusive falsehoods spread by a few individuals related to our work or our organization. We also have directly received and reported these recent false accusations and harassment concerns to our PAG/RTA Board or committee chairs.

A few of our staff have asked how we should respond when such comments come up at meetings. During the meetings, the committee chairs will enforce our code of conduct. However, if you are questioned or asked to respond, the best approach is through conveying the facts. The truth will always prevail.

PAG has a zero-tolerance policy against discrimination, harassment and retaliation (Please review the policy in ADP). Threatening our staff verbally or otherwise is unlawful and legally actionable. Please do not hesitate to report any and all concerns to me and/or Human Resources so that we can address those concerns immediately. We value PAG employees and want to ensure you of a safe workplace.

We are all stewards of public funds, and it comes with significant responsibility and accountability. It is PAG's legal duty to protect our employees in performing our fiduciary responsibilities.

Let's keep our focus on our mission of serving the public and making a difference in the lives of the people who live or work here or visit our region.



For questions or more
information, please contact the:

Arizona FHWA Division Office

4000 N Central Avenue, Suite 1500

Phoenix, AZ 85012

Phone: 602 379-3646