

PAG Management Committee Meeting Summary

Meeting Summary of March 12, 2025, Meeting

Full Video Recording (YouTube): [YouTube Video Recording](#)

Committee Members Present: Terry Rozema, Town of Marana
Beth Abramovitz, for Shane Dille, Town of Sahuarita
Tim Thomure, City of Tucson
Josué Licea, for Veronica Moreno, City of South Tucson
Anthony Casselman, ADOT
Carmine DeBonis, for Jan Leshner, Pima County

Committee Members Absent: Jeff Wilkins, Town of Oro Valley
Jason Bahe, Pascua Yaqui Tribe
Damascus Francisco, Tohono O'odham Nation

AGENDA

1. Call to Order

The meeting was called to order at 8:31 a.m.

2. Approval of January 8, 2025, Meeting Summary

Motion was made by Terry Rozema, Town of Marana, seconded by Carmine DeBonis, Pima County, and unanimously carried that the Management Committee of Pima Association of Governments approve the meeting summary of Jan. 8, 2025.

3. Regional Mobility and Accessibility Plan (RMAP) Update

[Item-3-RMAP-Update-Presentation.pdf](#)

PAG Transportation Planning Director Jeanette DeRenne provided the Management Committee with an update on the development of the 2055 RMAP, which is PAG's federally required long-range transportation plan. Discussion

included RMAP requirements, financial plan, plan summary, identified priorities and approval timeline.

Terry Rozema, Town of Marana, stated that the RMAP survey results are not congruent with the priorities that were identified by people who took the survey for the RTA Next plan and asked what the differences are between the two surveys and how the priorities are compared.

PAG Transportation Planning Director Jeanette DeRenne, explained that the two surveys are different. The RMAP survey consisted of general categories where the RTA Next survey got into specific projects. The RMAP survey, it was explained, presented participants with the opportunity to select if they want to see expanded transit services but did not include specifics of which services or how those could be expanded.

PAG Executive Director Farhad Moghimi, added that the biggest difference is that the long-range plan is establishing goals, objectives and outcomes throughout the entire planning effort versus RTA Next, which is specific to 34 items, limiting what participants could comment.

At the request of Tim Thomure, City of Tucson, Mr. Moghimi explained the key requirements for inclusion of all anticipated federal grant funded projects and projects pursuing direct federal appropriations in the RMAP as it relates to the current federal surface transportation reauthorization bill. Mr. Moghimi also detailed what the ramifications would be if RTA Next fails. The RMAP is a document that needs to make reasonable assumptions, Mr. Moghimi explained, adding that the reasonable assumption is within the next 4 years there will be additional RTA revenue. If not, adjustments would be made to the financial plan.

The Management Committee continued discussions regarding the recent project inclusions to the RMAP from the towns of Sahuarita and Marana and the discussion that took place on the subject at a recent Regional Council meeting. Mr. Moghimi shared a memo with the Management Committee (attached) from Beth Abramovitz of the Town of Sahuarita that addresses the concerns that were raised at the Regional Council meeting.

It was also noted that the projects were added following a request from PAG asking if any member jurisdiction had any roadway projects that they are considering submitting for federal grant funding within the next five years.

Other discussion topics included TPC's role in approving the project list, the status of TIP amendments and the Federal Highway Administration's lapse of air quality conformity as it relates to funding of federal grants.

This is an information item; no action taken.

4. Regional Transportation Revenues Update

Mr. Moghimi explained that this item is an ongoing update on the status of revenues. PAG tracks various revenue sources to make sure there is an opportunity to see how revenues are trending and performing, which is important to help the conversation going.

PAG Budget Manager James Towe provided the Management Committee with a detailed report on regional transportation revenue information and a summary of year-to-date FY 2024-2025 regionwide Highway User Revenue Fund (HURF) revenues. Detailed financial tables are available within the meeting packet materials.

This is an information item; no action taken.

5. Adjournment

The meeting adjourned at 9:10 a.m.

Management Cmte
03-12-25



MEMORANDUM

OFFICE OF THE TOWN MANAGER

To: Farhad Moghimi, Executive Director, PAG/RTA
CC: PAG Regional Council / Management Committee
From: Beth Abramovitz, Assistant Town Manager
Date: March 6, 2025
Re: RMAP Update - Town of Sahuarita Projects

At the RTA Board meeting of March 3, 2025, questions were asked about the inclusion of the Phoenix Zoo Access Road project in the RMAP update. The Town of Sahuarita would like to address the concerns raised about this project.

As part of the RMAP update process, PAG staff contacted all jurisdictions and requested that they submit new projects for inclusion in this process through several emails and through the committee process. In addition to these emails a memo was issued dated June 26, 2024, to the PAG Regional Council Members which outlined the differences between the RMAP update process and an RMAP amendment. This memo was later clarified by Thomas Benavidez, PAG Legal Counsel (email dated July 30, 2024), and Dan Gabiou of FHWA (email dated November 14, 2024) confirming the RMAP amendment designation. These emails were shared with members of the Regional Council.

In response to the initial PAG RMAP update request, Town staff reviewed our future capital improvement plan to determine if we had any projects that would require inclusion. During our review we found we had projects in our capital improvement plan that are currently unfunded but have been submitted for federal grant fund consideration. In follow-up discussions with PAG they indicated that any project that met those criteria should also be considered. Town staff worked with PAG staff to ensure that all information about the projects that was necessary for the update was promptly provided.

On January 8, 2025, PAG issued a memo to the PAG Management Committee which stated:

Federal regulations also require that projects submitted for federal discretionary grants align with the fiscally constrained long-range plan. Therefore, to assist in the process, please review the attached committee recommended in-plan project list. Let us know as soon as possible if there are any roadway projects you are considering submitting for federal grant funding within the next five years.

Additionally, at the January 8, 2025, Management Committee meeting, staff noted that the Town had added the Phoenix Zoo Access Road project. Timothy Thomure, the City Manager for Tucson, asked for clarification on the Town project (approximately 7 minutes into the meeting). Shane Dille, the Town Manager for Sahuarita, explained the purpose of the project, was thanked by Mr. Thomure, and the meeting continued with no objections to the inclusion of this project.

Again, the Town would like to clarify that our projects were submitted as part of the RMAP update process, and not as RMAP amendment requests.



From: Gabiou, Dan (FHWA) <dan.gabiou@dot.gov>

Sent: Thursday, November 14, 2024 7:55 AM

To: Thomas Benavidez <tbenavidez@benavidezlaw.com>

Cc: fmoghimipagregion.com <fmoghimipagregion.com>; Rex Scott <rex.scott@pima.gov>; Hansen, Alan (FHWA) <Alan.Hansen@dot.gov>; Truely, Romare (FHWA) <Romare.Truely@dot.gov>; Belleau, Tony (FTA) <anthony.belleau@dot.gov>; Jennifer Hobert <jhobert@azdot.gov>; Tina Munoz <tmunoz@azdot.gov>

Subject: RE: Tucson's Proposed Stone Avenue Bus Rapid Transit [BRT] Project

Hello Mr. Benavidez,

The Federal Highway Administration (FHWA) agrees with the Pima Association of Government (PAG) that when amending its adopted Regional Transportation Plan (RTP) (aka Metropolitan Transportation Plan, or MTP), PAG must comply with all applicable federal requirements. With all RTP amendments (as defined in [23 CFR 450.104](#)), FHWA expects Transportation Management Agencies (TMAs) to follow their agreed upon procedures, and redemonstrate fiscal constraint and air quality conformity per [23 CFR 450.104 "Amendment"](#). The most applicable regulations associated with RTP amendment compliance (inclusive of requested regulations on performance measures, air quality conformity, and fiscal constraint) include: [23 USC 134 \(Metropolitan transportation planning\)](#), [23 CFR 450.104 \(Definitions\)](#), [23 CFR 450.316 \(Interested parties, participation, and consultation\)](#), [23 CFR 450.324 \(Development and content of the metropolitan transportation plan\)](#), [40 CFR 93.104 \(Frequency of conformity determinations\)](#), [40 CFR 93.105 \(Consultation\)](#), and [40 CFR 93.112 \(Criteria and procedures: consultation\)](#). Guidance to achieve fiscal constraint compliance can be found on [FHWA's Federal Highway Policy & Guidance Center website](#).

As you correctly note, any time PAG completes an amendment, a joint FHWA-FTA review, federal conformity determination, and acceptance are required, with FHWA serving as the lead federal agency to facilitate acceptance in Arizona per the current FHWA-FTA Memorandum of Agreement (MOA).

If PAG determines to amend its 2045 RMAP per the City of Tucson's request, it is recommended to schedule an interagency consultation meeting (per [40 CFR 93.105](#) and [40 CFR 93.112](#)) to discuss appropriate steps to achieve a joint federal conformity determination and acceptance of the amendment.

Please contact Mr. Anthony (Tony) Belleau with the Federal Transit Agency (FTA) to validate the following assumption: "As we understand the federal statute, projects must be included in the adopted RMAP and TIP with local match commitments secured before the FTA will consider funding new projects."

If additional clarification is needed, please feel free to contact me.

Respectfully,

Dan Gabiou
Community Planner

FHWA – AZ Division
602-382-8966
dan.gabiou@dot.gov

From: Thomas Benavidez <tbenavidez@benavidezlaw.com>
Sent: Tuesday, July 30, 2024 5:10 PM
To: Gabiou, Dan (FHWA) <dan.gabiou@dot.gov>
Cc: fmoghimipagregion.com <fmoghimipagregion.com>; Rex Scott <rex.scott@pima.gov>
Subject: Tucson's Proposed Stone Avenue Bus Rapid Transit [BRT] Project

Mr. Gabiou:

Subject: Tucson's Proposed Stone Avenue Bus Rapid Transit [BRT] Project

As you are aware, PAG staff are reviewing a request to proceed with the above-referenced amendment to the adopted 2045 Regional Mobility and Accessibility Plan (RMAP). The stated purpose for the BRT amendment is to enable the City of Tucson to pursue a federal grant to fund the BRT project. As we understand the federal statute, projects must be included in the adopted RMAP and TIP with local match commitments secured before the FTA will consider funding new projects.

In our view, the BRT would be a new, significant project added to the 2045 RMAP. Therefore, we believe: 1) PAG must comply with all applicable federal regulatory planning requirements derived from 23 USC 134; and 2) this RMAP amendment will require final review and approval by the Federal Highway Administration (FHWA).

To ensure that we are applying the correct federal standards to our review of the City's request for an amendment to the 2045 RMAP, we are asking that you provide us with references to the regulations you believe outline the appropriate steps we are required to follow to accommodate this BRT amendment request, including performance measures, air quality conformity and financial constraints demonstration requirements. Additionally, please include any other elements of the RMAP that you anticipate will need to be updated as part of the proposed amendment process to ensure full compliance with federal laws and regulations.

Your assistance will help us greatly in making sure that we are following FHWA's requirements prior to the submittal of the amendment for your review.

We thank you for your anticipated assistance with this project.

Sincerely,

Thomas Benavidez, PAG Legal Counsel
Farhad Moghimi, PAG Executive Director

cc: Rex Scott, PAG Chair

Date: July 26, 2024

To: PAG Regional Council Members

From: Farhad Moghimi, PAG Executive Director



Cc: Thomas Benavidez, PAG Legal Counsel
Dave Atler, Deputy Executive Director
Jeanette DeRenne, Transportation Planning Director
Jamie Brown, Director of Strategic Planning, Programing and Policy

Re: Amendment process for the 2045 Regional Mobility and Accessibility Plan (RMAP) Update for the proposed Tucson Bus Rapid Transit (BRT) Project

Since we did not have an opportunity to update the Regional Council as requested at the planned July 25, 2024, meeting, this memo outlines the amendment process required for the Regional Mobility and Accessibility Plan (RMAP), also known as the Regional Transportation Plan (RTP), with respect to the proposed Tucson Bus Rapid Transit (BRT) project.

To ensure compliance with federal and state laws and regulations, following this amendment process is critical.

As the federally designated Metropolitan Planning Organization (MPO), Pima Association of Governments has a statutory responsibility to comply with all rules and regulations governing its operations, including state laws. Compliance ensures public confidence in the integrity of regional planning efforts and the required public input process.

Under 23 U.S.C. 134 and 49 U.S.C. 5303, any project seeking federal funding must be included in the metropolitan area's RMAP.

The proposed BRT project is viewed as a major revision to the 2045 RMAP.

Major revisions to the RMAP are defined as:

- Adding or deleting projects.
- Making significant changes to project costs, initiation dates, or scopes.

Requirements to make an amendment:

The PAG Regional Council has authorized staff to start the process for a major update to the RMAP. As discussed during the May 30, 2024, Regional Council meeting, an amendment process is linear and takes up to nine months to complete and would run parallel to the major update process, if the amendment process is approved. During an amendment process, the following requirements must be followed:

- **Public Involvement and Fiscal Constraint**

- Any draft amendment to the RMAP requires public review and comment in accordance with PAG's adopted Public Involvement Plan (PIP).
- An RMAP amendment requires a Title VI Analysis to be completed to demonstrate compliance with federal requirements.
- Once a draft RMAP amendment is developed, it is initially reviewed by the Federal Highway Administration (FHWA) and Arizona Department of Transportation (ADOT) before a formal public comment period begins, followed by an official public hearing.
- An amendment must demonstrate fiscal constraint, ensuring that the project can be realistically funded.
 - Currently, the proposed BRT project is not a fiscally constrained project in the PAG Regional Council-adopted 2045 RMAP
 - As a result, the City of Tucson will need to demonstrate all anticipated funding sources in an amendment for the BRT project.

- **Revenue and Cost Estimates**

- All revenue and cost estimates must be updated based on reasonable financial principles and information (**23 C.F.R. § 450.324(f)(11)(iv)**).
- **In accordance with CFR 450.324 (11) (viii)**, the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) will not approve any updated or amended metropolitan transportation plan unless it includes a revised revenue situation as part of its financial constraint analysis.

- Incidentally, an update to the RTA revenue projections is necessary, including recent substantial cost escalations reflected in the adopted Transportation Improvement Program (TIP). Due to the timing of the proposed amendment, the new projections would also need to be accounted for in this analysis.
 - Similarly, as part of the RMAP major update or an amendment to the existing document, revised revenue and cost estimates would be required for projects that are seeking significant changes to project costs, initiation dates, and scopes. This would include the four deferred RTA projects and First Ave. project, which all include significant scope and cost changes.
- **Air Quality Conformity:**
 - An Air Quality Conformity determination must be approved by the Environmental Protection Agency (EPA). Coordination with the EPA, FHWA, and ADOT is ongoing to address this in the TIP.
 - Without approval of the TIP from the EPA, only minor administrative changes to the RMAP will be accepted by the FHWA. The proposed BRT is not exempt from this requirement.

Additional Requirements:

- **Modeling**
 - The BRT project must be modeled for the travel demand and air quality conformity analyses.
 - Land use modeling updates are required to reflect proposed higher density land use and scope changes or changes to roadway configurations proposed on First Ave. and Stone Ave., ensuring consistency with the RMAP's performance goals and air quality conformity requirements. Land use plans must be adopted by the jurisdiction's legislative body prior to being included in the regional model. To date, we have not received the information needed to begin the modeling process.

- **Financial Constraint**

- **The RMAP must be financially constrained as per 23 CFR 450.324,** including a realistic estimate of expected revenues and identification of all necessary funding to implement proposed projects.

- **Capital Investment Grants (CIG) Program**

- **Administered by the FTA under 49 U.S.C. 5309,** the CIG program requires projects to go through a multi-step, multi-year process including Project Development, Engineering, and Full Funding Grant Agreement (FFGA). Projects must be included in the RMAP and Transportation Improvement Program (TIP) during the Project Development phase including commitment of the local match requirements.

PAG is committed to following all federal and state regulations in the amendment process for the RMAP. Additionally, the FHWA staff concurs with the information requested and is also encouraging the City of Tucson to submit all required information for review so we can proceed with the formal consultation process.

To ensure the successful implementation of the Tucson BRT project and to potentially secure federal funding, it is essential to comply with the requirements for an amendment for the Regional Council's consideration.

Please let me know if you have any questions.