

Public Comment periods for Formal Amendments 2025.060 2025.070, 2025.080, 2025.090, & 2025.100

Major revisions to the Transportation Improvement Program (TIP) are typically addressed through the TIP Development process. That process provides opportunities for public involvement that satisfy federal regulations. Public involvement and feedback were the cornerstone for the development of the RTA Next plan, up to and including voter approval. Implementing the plan requires several major amendments that add new projects for FY 2027 outside of the normal TIP Development cycle. Therefore, additional public comment periods were held as soon as amendments were recommended for approval by the Transportation Planning Committee, so that they could be submitted to the PAG Regional Council for their consideration prior to the September 24, 2026, meeting, where action is requested for these amendments.

FY 2025 - FY 2029 PAG TIP Amendment(s) 2025.060, 2025.070, 2025.080, 2025.090

Comment Period: August 24, 2026 - September 8, 2026

Comments and Responses

Comment 1 - Mr. Ed Hawley

"Continue to build it and I will drive it!!"

Response 1

Thank you taking the time to review the amendments to the FY 2025 – FY 2029 TIP. Your comment will be shared with representatives from the PAG member agencies.

Comment 2 - Amy Porterfield

"Saavi Services for the Blind submits these comments on the proposed amendments to the FY 2025 to FY 2029 Transportation Improvement Program. Saavi operates NBPCB-certified Structured Discovery training centers in Tucson and Phoenix, serving blind and low vision Arizonans who rely on public transportation to reach training, employment, medical care, and community life. Our comments address programming, funding, timing, and implementation of these amendments, consistent with the scope PAG identified.

Program the Safety, ADA and Active Transportation element with visible annual amounts. As these amendments load RTA Next projects into the TIP, we ask that the Safety, ADA and Active

Transportation element appear as an identified line with a dollar figure in each of the five programmed years rather than as a lump sum deferred to the out-years. Accessibility work that is programmed only in years four and five is accessibility deferred. Timing is the substance of this request.

Program complementary paratransit cost in the same amendment that changes fixed-route service. ADA complementary paratransit under 49 CFR Part 37 is a legal consequence of fixed-route operation, not an optional service. Where an amendment adds, extends, or rebalances fixed-route transit programming, we ask that the corresponding paratransit operating and capital cost be programmed in the same amendment. We further ask that PAG program funding for same-day and on-demand paratransit capability, including the scheduling technology required to support it, and that this programming be shown as derived from PAG's Public Transit-Human Services Coordinated Transportation Plan as FTA Section 5310 requires. Next-day reservation windows are a barrier to employment for blind riders in a way that a same-day capability directly resolves.

Write accessible boarding areas and continuous accessible sidewalk into project scopes, not into later phases. For each roadway corridor and arterial reconstruction project affected by these amendments, we ask that the programmed scope explicitly include accessible boarding areas at every transit stop within the project limits, continuous accessible pedestrian path, compliant curb ramps, detectable warning surfaces, and accessible pedestrian signals at signalized crossings, funded inside the project rather than as an unfunded future improvement. A stop without an accessible boarding pad and a connecting sidewalk is not a usable stop.

Report the baseline. We ask that PAG report, at the time these amendments are adopted, how many transit stops in the region currently meet accessibility standards and how many are programmed for improvement within this five-year TIP. Without that baseline the public cannot evaluate whether the programming in these amendments is adequate.

Make the amendment materials accessible. We ask that TIP amendment documents be posted in formats that are readable with a screen reader, that project tables carry proper structure rather than being distributed as untagged PDF, and that the online comment form be tested for screen reader usability. A 15-day comment window is short. It is functionally shorter for a blind resident who must first work around an inaccessible document."

Response 2

Thank you taking the time to review the amendments to the FY 2025 – FY 2029 TIP. Prior to addressing each point raised, there are several important things to note.

1. Your comments will be formally shared with the PAG Regional Council. Additionally, our staff will reach out to you for further discussion and understanding of your concerns.
2. The materials presented for comment are all amendments to the current Transportation Improvement Program, which contains the programming of regionally significant projects for fiscal years 2025 through 2029. It observes the state fiscal year starting July 1 and ending June 30. The majority of these changes are for the current fiscal year, FY 2027, meaning that they appear in the third year of the table.
3. The TIP Development process begins this fall, which will create a full project list, an air quality conformity determination, new traffic and congestion analysis, a demonstration of financial constraint, and supporting documentation for fiscal years 2028 through 2032. Not only are your comments being considered at present, but they will be shared with the Transportation Planning Committee for consideration during the development of the next full TIP.

Each of the eight member jurisdictions listed in the RTA Next plan has an allocation of funding in the Safety, ADA and Active Transportation element that they may request at any time, as opposed to a fixed amount of programming set in each year. The prioritization of the projects within this element, further categorized by ballot, are left to the individual jurisdictions, so long as the projects themselves conform to the details identified in the RTA Administrative Code for each ballot. For example, funding was requested by the City of Tucson in this element for the Safe Routes to School Program, and by the Town of Oro Valley for a new traffic signal at Tangerine Rd. and Musette Dr., both shown in Amendment #2025.080. Additional projects in FY 2028 and beyond will be programmed at the request of member jurisdictions during the next TIP Development cycle. As previously mentioned, we will formally share their comments with the Jurisdictions so they are aware and may be able to include in their upcoming plans for projects in the Safety Element, and one of our staff members will be reaching out to discuss your concerns and can direct you to additional resources to share your feedback regarding the need for projects.

Transit services in our region conform to Federal ADA and Title VI guidelines, and specific programs funded through FTA Grants conform to those fund-type-related requirements as well. Neither this set of amendments nor the upcoming Transit amendment which was alluded to above represent any changes to existing fixed routes. Certain features beyond those federal requirements, like same-day scheduling for paratransit services, would incur costs that far exceed the funding available in the plan for the Transit element. However, the RTA and its member jurisdictions consistently participate in efforts to gain efficiencies in the Transit system wherever possible, collectively seek new funding sources to supplement existing services, and research the cost and feasibility of service enhancements. Our staff can share additional information about these efforts during an upcoming discussion.

Each roadway project in the existing RTA Plan and the RTA Next plan includes design elements for ADA-compliant bike and pedestrian facilities, sometimes under the wording “modernization.” Local jurisdictions utilize safety data to identify the greatest points of need for existing facilities, including Transit facilities, and they welcome feedback from the public on specific locations where additional improvements are desired.

Jurisdictions are required to have their own ADA Transition Plans. Our understanding is that these transition plans are where an evaluation on meeting the standards would be addressed. If the standards aren’t being met on the broader network, the transition plan would address how those needs will be addressed. We will share this suggestion with the jurisdictions to make the accessibility baseline information more easily accessible to the public.

The TIP document and amendment tables are examined during each TIP Development Cycle for opportunities to enhance their accessibility. We welcome your suggestions and will look to incorporate full tabular data in the FY 2028 – FY 2032 TIP version.

The amendments included in this public notice are all related to the implementation of the RTA Next plan projects starting in FY 2027 (July 1, 2026, through June 30, 2027). That plan incorporated over 6 years of public input and citizen-led committee effort, more than 150 outreach activities both in-person and online, and was ultimately approved by the voters of Pima County. This comment period is an extension of those efforts, and as such, utilizes a 15-day comment period, reflecting the most recent federal guidance from the FHWA. The annual TIP Development cycle will incorporate the full measure of public participation strategies outlined in our Public Involvement Policy required by CFR 450.316(a). Again, we greatly appreciate your feedback and will pass along your comments to the jurisdictions and the PAG Regional Council so that they can keep them in mind as we begin the development of the FY 2028 – FY 2032 TIP later this fall.

Comment 3 - Donald Porterfield

“The National Federation of the Blind of Arizona submits these comments on the proposed amendments to the FY 2025 to FY 2029 Transportation Improvement Program. We are the oldest and largest organization of blind Arizonans, with chapters across the state including Tucson, and we speak for ourselves rather than about ourselves. Our comments address the programming, funding, timing, and implementation of these amendments.

Earlier this month we held our 80th Annual State Convention in Tucson. Several hundred blind Arizonans traveled to this region and moved through it on foot and on transit for four days. That experience is the basis of what follows.

Blind people do not drive. Public transportation is not a convenience for us and it is not a social service. It is the infrastructure that determines whether a blind Arizonan can hold a job,

keep a medical appointment, attend a class, or take a child to school. Every one of these amendments is therefore an employment decision and a civil rights decision, whether or not it is framed that way in the project list.

Do not defer the Safety, ADA and Active Transportation element to the out-years. As RTA Next projects are programmed into this TIP, we ask that the Safety, ADA and Active Transportation element carry an identified dollar amount in each of the five programmed years. Accessibility funding placed in years four and five is accessibility that a blind rider does not get to use for four years, and that is a timing decision this body is making right now.

Program same-day and on-demand paratransit, and program complementary paratransit alongside any fixed-route change. ADA complementary paratransit under 49 CFR Part 37 follows automatically from fixed-route service. Where an amendment adds, extends, or rebalances fixed-route programming, the paratransit operating and capital cost belongs in the same amendment rather than arriving later as an unfunded obligation. Beyond the federal floor, we ask that this TIP program funding for same-day and on-demand paratransit capability, including the scheduling technology it requires, and that the programming be shown as derived from PAG's Public Transit-Human Services Coordinated Transportation Plan as FTA Section 5310 requires. A next-day reservation requirement is not a scheduling inconvenience. It is a barrier that removes blind applicants from consideration for jobs with variable shifts, disqualifies us from same-day interviews, and forces us to choose between an urgent medical appointment and no ride at all. No sighted rider in this region is asked to plan every trip 24 hours ahead. We are asking that this TIP fund the capability to stop asking it of us.

Build the accessible boarding area and the sidewalk with the road, not after it. For every roadway corridor and arterial reconstruction project touched by these amendments, we ask that the programmed scope explicitly include accessible boarding areas at each transit stop inside the project limits, continuous accessible pedestrian path, compliant curb ramps, detectable warning surfaces, and accessible pedestrian signals at signalized crossings, funded within the project. A blind traveler locates a stop by a firm, findable, connected landing area. A sign planted in gravel with no sidewalk reaching it is not a transit stop that we can use, and a bus route serving stops we cannot reach is service the region is paying for and we are not receiving. This is a scope and funding question on projects already in front of you.

Publish the accessibility baseline. We ask that PAG report, when these amendments are adopted, how many transit stops in the region currently meet accessibility standards and how many are programmed for improvement inside this five-year window. Members of the public, including blind members of the public, cannot evaluate whether this programming is adequate against a number that has never been stated.

Make TIP materials usable by the people most affected by them. TIP amendment documents should be posted in formats that work with screen readers, project tables should carry real table structure rather than being distributed as untagged PDF, and the online comment form should be tested with a screen reader. A 15-day comment period is already short. For a blind Arizonan who must first find a workaround for an inaccessible document, it is shorter still, and that has consequences under Title VI and the ADA for the validity of this participation proc”
[end of comment]

Response 3

Thank you taking the time to review the amendments to the FY 2025 – FY 2029 TIP. Prior to addressing each point raised, there are several important things to note.

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Each of the eight member jurisdictions listed in the RTA Next plan has an allocation of funding in the Safety, ADA and Active Transportation element that they may request at any time, as opposed to a fixed amount of programming set in each year. The prioritization of the projects within this element, further categorized by ballot, are left to the individual jurisdictions, so long as the projects themselves conform to the details identified in the RTA Administrative Code for each ballot. For example, funding was requested by the City of Tucson in this element for the Safe Routes to School Program, and by the Town of Oro Valley for a new traffic signal at Tangerine Rd. and Musette Dr., both shown in Amendment #2025.080. Additional projects in FY 2028 and beyond will be programmed at the request of member jurisdictions during the next TIP Development cycle. As previously mentioned, we will formally share their comments with the Jurisdictions so they are aware and may be able to include in their upcoming plans for projects in the Safety Element, and one of our staff members will be reaching out to discuss your concerns and can direct you to additional resources to share your feedback regarding the need for projects.

Transit services in our region conform to Federal ADA and Title VI guidelines, and specific programs funded through FTA Grants conform to those fund-type-related requirements as well. Neither this set of amendments nor the upcoming Transit amendment which was alluded to above represent any changes to existing fixed routes. Certain features beyond those federal requirements, like same-day scheduling for paratransit services, would incur costs that far exceed the funding available in the plan for the Transit element. However, the RTA and its member jurisdictions consistently participate in efforts to gain efficiencies in the Transit system wherever possible, collectively seek new funding sources to supplement existing services, and research the cost and feasibility of service enhancements. Our staff can share additional information about these efforts during an upcoming discussion.

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Jurisdictions are required to have their own ADA Transition Plans. Our understanding is that these transition plans are where an evaluation on meeting the standards would be addressed. If the standards aren’t being met on the broader network, the transition plan would address how those needs will be addressed. We will share this suggestion with the jurisdictions to make the accessibility baseline information more easily accessible to the public.

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Comment 4 - Ms. Victoria Stephens

"Buses are causing more crime. Tucson caters to the homeless and does not provide safety to those on the loop."

Response 4

Thank you taking the time to review the amendments to the FY 2025 – FY 2029 TIP. Your comment will be shared with representatives from the PAG member agencies.

The RTA Next plan provides \$51,000,000 across 20 years for Safety and Security of the Regional Transit System. PAG/RTA will be working closely with all our member jurisdictions to develop the next Transportation Improvement Program later this fall that will cover the fiscal years of 2028 through 2032 (July 2027 through June 2032) to identify programs and projects within this ballot designed to improve the safety and security of the Regional Transit System utilizing these funds.

For additional context, here is the description for this ballot item and the funding as described in the RTA Administrative Code: "Funding for safety and security of the transit system is available for both operations and capital improvements needed to assure public safety on the region's transit system. Eligible operational activities include provision of dedicated security and de-escalation personnel who are engaged in monitoring security on transit vehicles and at transit stops, investigation of incidents on transit vehicles or transit properties, active monitoring of security technologies and cleaning/disposal of hazardous materials. Capital improvements may include but are not limited to security upgrades on transit vehicles, park-n-ride locations, and transit stops/stations/locations, which include dedicated security technologies and physical security improvements... Project funding shall consist of \$51,000,000. Project funding recommendations shall be developed by the transit system operators and reviewed by the RTA Transit Working Group prior to consideration by the RTA Board."

FY 2025 - FY 2029 PAG TIP Amendment(s) 2025.100

Comment Period: September 3, 2026 - September 18, 2026

Comments and Responses

No comments were submitted for this period.