

**Date:** September 22, 2026

**To:** Jamie Brown, Director of Strategic Planning, Programming, and Policy

**From:** Dustin Fitzpatrick, *DF* Environmental Planning Administrator

**Subject:** Transportation Conformity Determination for Amendment #2025.070 to the FY 2025 – FY 2029 Transportation Improvement Program (TIP)

### Overview

Transportation conformity is required by the Clean Air Act section 176(c) (42 U.S.C. 7506(c)) to ensure that federal funding and approval are given to highway and transit projects that conform to the air quality goals established by a state air quality implementation plan (SIP). Conformity, for the purpose of the SIP, means that transportation activities will not cause new air quality violations, worsen existing violations, or delay timely attainment of the National Ambient Air Quality Standards (NAAQS). Conformity applies to transportation plan updates and amendments, transportation improvement program updates and amendments, and highway and transit projects funded or approved by the FHWA and FTA in all nonattainment and maintenance areas. It applies to transportation-related criteria pollutants (ozone, carbon monoxide (CO), nitrogen dioxide (NO<sub>2</sub>), particles with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM<sub>10</sub>) and particles with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers (PM<sub>2.5</sub>)) for which the area is designated nonattainment or has a maintenance plan.

The major components of transportation conformity are: interagency consultation/public involvement; latest planning assumptions and emissions model; implementation of transportation control measures; regional emissions analysis; and fiscal constraint.

Amendment #2025.070 to the FY 2025 - FY 2029 TIP moves 2055 Regional Mobility and Accessibility Plan (RMAP) Project ID 37.00 I-10 West #H: Moore Rd TI into the FY 2025 - FY 2029 TIP as Project ID 16.26, "Moore Rd / I-10 TI". The project is regionally significant and located within the Rillito PM<sub>10</sub> nonattainment area. The regional emissions analysis conducted for the 2055 RMAP included the emissions from Project ID 37.00 in the 2035, 2045 and 2055 analysis years. All FY 2025 - FY 2029 TIP projects were included in the previous regional emissions analysis and the design concept and scope of the projects have not significantly changed. The design phase of Project ID 16.26 will be funded in the FY 2025 - FY 2029 TIP and construction completion is anticipated in FY 2031. FHWA/FTA issued a finding of conformity on September 5, 2025, for the 2055 RMAP.

### Interagency consultation/public involvement

Within PAG's transportation planning area, the Rillito planning area is designated moderate nonattainment with the NAAQS. The SIP does not contain an approved motor vehicle

emission budget for the Rillito PM10 nonattainment area; therefore, the interim emissions test applies per 40 CFR §93.109(c)(3).

Interagency consultation was conducted during the TIP amendment process.

Correspondence detailing reliance on previous regional emissions analysis for proposed Amendment #2025.070 to the FY 2025 - FY 2029 TIP was shared with agencies on July 20, 2026. A single comment was received from staff from the Environmental Protection Agency (EPA) with concerns that the Moore Rd / I-10 TI project was not modeled within the timeframe of the FY 2025 - FY 2029 TIP. A meeting was held with PAG, EPA and FHWA staff on August 4, 2026, to discuss the comment. Following the meeting, EPA staff advised that they agreed with PAG's proposed reliance on the previous regional emissions analysis used for the 2055 RMAP. PAG notified the interagency consultation group on August 5, 2026, that the EPA comment was resolved.

PAG held a public comment period from August 25, 2026, to September 8, 2026, to provide opportunity for comment on the air quality conformity analysis conducted for Amendment #2025.070 to the FY 2025 - FY 2029 TIP. PAG's Public Involvement Policy does not specify a comment timeframe for TIP amendments and FHWA has permitted 15-day comment periods for similar past actions. No public comments related to transportation conformity were received for Amendment #2025.070.

### **Latest planning assumptions and emissions model**

The latest planning assumptions are detailed in the 2055 RMAP Technical Addendum. Forecasted population and employment estimates, land use modeling and travel demand modeling continue to apply for the FY 2025 - FY 2029 TIP.

EPA's Motor Vehicle Emissions Simulator model, MOVES4, was utilized for onroad motor vehicle emissions modeling for PM10 from vehicle exhaust, tire wear and brake wear in the Rillito PM10 Nonattainment Area for analysis years 2030, 2035, 2045 and 2055. Analysis was conducted using the TDM to estimate average daily VMT, speeds and travel pattern characteristics for the various road types in the regional roadway network for the following "Action" scenarios: 2030, 2035, 2045 and 2055. MOVES model inputs include the most recent local data for meteorology, vehicle registration, speeds, travel patterns and gasoline and diesel fuel properties. The EPA MOVES4 model accounts for all current and future regulatory changes expected over the 2025-2055 period. Version MOVES5 will be required for future regional emissions analysis after December 11, 2026.

EPA Compilation of Air Pollutant Emission Factors, AP-42, emission factors were used to calculate PM10 emissions from re-entrained dust produced by vehicles traveling on paved (section 13.2.1.3) and unpaved (section 13.2.2) roads in the Rillito PM10 nonattainment area for analysis years 2030, 2035, 2045 and 2055.

### **Transportation control measures**

Transportation control measures (TCMs) required by the SIP for the Tucson Air Planning Area (TAPA), such as PAG's Travel Reduction Program (TRP) and the Pima County Department of Environmental Quality's (PDEQ) Voluntary No-Drive Days/Clean Air Program, remain in effect per Arizona Revised Statute §49-404 and Clean Air Act 110(l) and result in PM10 emission reductions from onroad motor vehicles in the Rillito PM10 nonattainment area. The Rillito

PM10 nonattainment area is within the TAPA. The TRP and PDEQ Voluntary No-Drive Days/Clean Air Program are funded by ADEQ through the Vehicle Emissions Inspection fund (ARS §49-544).

There are no new TCMs applicable to the Rillito PM10 nonattainment area SIP.

### Regional emissions analysis

The below table details the results of PM10 emissions calculated using MOVES4 and AP-42 for the Rillito PM10 nonattainment area for PAG's 2055 RMAP. The regional emissions analysis for PAG's 2055 RMAP included all FY 2025 - FY 2029 TIP projects and the design concept and scope of the projects have not significantly changed.

### PM10 Results (U.S. tons/year) for Conformity Interim Emissions (Action/Baseline) Test

| Analysis Year          | Rillito PM <sub>10</sub> Nonattainment Area PM <sub>10</sub> (tons/yr) |
|------------------------|------------------------------------------------------------------------|
| <b>1990 Baseline</b>   | <b>921.90</b>                                                          |
| 2030 "Action" Scenario | 418.37                                                                 |
| 2035 "Action" Scenario | 454.15                                                                 |
| 2045 "Action" Scenario | 488.60                                                                 |
| 2055 "Action" Scenario | 392.45                                                                 |

As demonstrated by the PM10 emission modeling results in above table, completing the TIP projects as stipulated in the FY 2025 - FY 2029 TIP satisfies the requirements of the interim emissions test prescribed by 40 CFR §93.119. Total regional onroad motor vehicle emissions of PM10 in the Rillito PM10 nonattainment area associated with implementation of Amendment #2025.070 to the FY 2025 - FY 2029 TIP for all years tested are projected to be less under the "Action" scenarios than under the 1990 Baseline. Additionally, the emissions are reasonably expected to be less during the periods between analysis years.

40 CFR § 93.122 *Procedures for determining regional transportation-related emissions (g) Reliance on previous regional emissions analysis*, provides for reliance on PAG's regional emissions analysis conducted for the 2055 RMAP for Amendment #2025.070 to PAG's FY 2025 - FY 2029 TIP.

### Fiscal constraint

Amendment #2025.070 to PAG's FY 2025 - FY 2029 TIP is fiscally constrained. It programs \$371,694,851 in FY 2027 - FY 2029, compared to a total budget amount of \$374,273,540.

### Summary

Based upon the preceding analysis and documentation, PAG makes the determination that the FY 2025 - FY 2029 TIP and Amendment #2025.070 conform with requirements set forth in 40 CFR part 93, subpart A, as required by 23 CFR part 450, subpart C, § 450.326(a).

cc: Michael Ortega, P.E.  
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