U.S. Department of Transportation
Federal Highway Administration

ARIZONA DIVISION

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July 11, 2017

In Reply Refer To:
(TRAP 19 - MPO)
Phoenix Non-attainment Area
Western Pinal County Non-attainment Area
Maricopa Association of Governments
Sun Corridor Metropolitan Planning Organization
Conformity Finding

Mr. Dennis Smith, Executive Director
Maricopa Association of Governments
302 North First Avenue
Phoenix, Arizona 85003

Ms. Irene Higgs, Director
Sun Corridor Metropolitan Planning Organization
211 N Florence Street, Ste 103
Casa Grande, Arizona 85122

Dear Mr. Smith:
Dear Ms. Higgs:

In accordance with the Clean Air Act Amendments of 1990, a conformity finding of the transportation plans and programs in a non-attainment area is required of the U.S. Department of Transportation. Based on our evaluation of the Maricopa Association of Governments (MAG) and Sun Corridor Metropolitan Planning Organization (SCMPO) Metropolitan Planning Organizations (MPOs) finding of conformity and related documentation submitted in your June 29, 2017 and June 14, 2017 letters, in coordination with the Environmental Protection Agency (EPA), the MPOs and the State Department of Transportation, the Federal Highway Administration and Federal Transit Administration have determined that the Phoenix, Arizona and the Casa Grande, Arizona urbanized areas have met the requirements of the EPA Transportation Conformity Rule (40 CFR Parts 51 and 93). This includes the West Pinal PM-10 and West Central Pinal PM-2.5 non-attainment areas, portions of which are located in each of the respective MPO Planning Area Boundaries as well as the Maricopa non-attainment and maintenance areas.

A Finding of Conformity is hereby made with respect to the subject FY2018-2022 MAG Transportation Improvement Program (TIP) and 2040 Regional Transportation Plan as approved by MAG Regional Council on June 28, 2017 and the amended FY2016-2025 Transportation Improvement Program and Regional Transportation Plan 2040 as approved by the SCMPO Executive Board on June 13, 2016. A Finding of Conformity was made previously on the

MAG Updated Regional Transportation Plan and FY 2017-2021 TIP on July 11, 2016. The conformity finding for the SCMPO FY2016-2025 TIP and 2040 RTP was also made on July 11, 2016.

This conformity determination is in effect until such time as a new determination is required either by new regulatory requirements, major revision of transportation plans, or a State Implementation Plan (SIP) revision.

Sincerely,

for Anthony Sarhan
Karla S. Petty
Division Administrator

ec: dsmith@azmag.gov; ihiggs@scmpo.org; Gregory Byres ADOT (gbyres@azdot.gov), Dominique Paukowits (FTA Region 9) , Colleen McKaughan EPA (mckaughan.colleen@epa.gov); banderson@azdot.gov; bchenausky@azdot.gov

Internal ec (Do not show on original): KPetty, ASarhan, AHansen, EStillings, TDeitering, FHWA Arizona

ESS

SCMPO

Conformity Analysis Documentation

FHWA Checklist for MPO TIPs/RTPs

February 18, 2005

40 CFR	Criteria	Page	Comments
§93.102	Document the applicable pollutants and precursors for which EPA designates the area as nonattainment or maintenance. Describe the nonattainment or maintenance area and its boundaries.	1	PM-10 PM2.5
§93.104 (b, c)	Document the date that the MPO officially adopted, accepted or approved the TIP/RTP and made a conformity determination. Include a copy of the MPO resolution. Include the date of the last prior conformity finding.	cover page 1	7-11-16
§93.104 (e)	If the conformity determination is being made to meet the timelines included in this section, document when the new motor vehicle emissions budget was approved or found adequate.	page	NA
§93.106 (a)(2)ii	Describe the regionally significant additions or modifications to the existing transportation network that are expected to be open to traffic in each analysis year. Document that the design concept and scope of projects allows adequate model representation to determine intersections with regionally significant facilities, route options, travel times, transit ridership and land use.	TIP	list of projects
§93.108	Document that the TIP/RTP is financially constrained (23 CFR 450).	TIP	visible revenue
§93.109 (a, b)	Document that the TIP/RTP complies with any applicable conformity requirements of air quality implementation plans (SIPs) and court orders.	NA	
§93.109 (c-k)	Provide either a table or text description that details, for each pollutant and precursor, whether the interim emissions tests and/or the budget test apply for conformity. Indicate which emissions budgets have been found adequate by EPA, and which budgets are currently applicable for what analysis years.	P. 1/2	interim tests. Budgets are me
§93.110 (a, b)	Document the use of latest planning assumptions (source and year) at the "time the conformity analysis begins," including current and future population, employment, travel and congestion. Document the use of the most recent available vehicle registration data. Document the date upon which the conformity analysis was begun.	P3 Table 2	ok
USDOT/EPA guidance	Document the use of planning assumptions less than five years old. If unable, include written justification for the use of older data. (1/18/02)	P3 Table 2	yes
§93.110 (c,d,e,f)	Document any changes in transit operating policies and assumed ridership levels since the previous conformity determination. Document the use of the latest transit fares and road and bridge tolls. Document the use of the latest information on the effectiveness of TCMs and other SIP measures that have been implemented. Document the key assumptions and show that they were agreed to through Interagency and public consultation.	NA	
§93.111	Document the use of the latest emissions model approved by EPA.	3.	yes
§93.112	Document fulfillment of the interagency and public consultation requirements outlined in a specific implementation plan according to §51.390 or, if a SIP revision has not been completed, according to §93.105 and 23 CFR 450. Include documentation of consultation on conformity tests and methodologies as well as responses to written comments.	4.	consultation ok
§93.113	Document timely implementation of all TCMs in approved SIPs. Document that implementation is consistent with schedules in the applicable SIP and document whether anything interferes with timely implementation. Document any delayed TCMs in the applicable SIP and describe the measures being taken to overcome obstacles to implementation.	3-4	NA. No Plans. w TCMs.
§93.114	Document that the conformity analyses performed for the TIP is consistent with the analysis performed for the Plan, in accordance with 23 CFR 450.324(f)(2).	1	ok

40 CFR	Criteria	Page	Comments
§93.118 (a, c, e)	For areas with SIP budgets: Document that emissions from the transportation network for each applicable pollutant and precursor, including projects in any associated donut area that are in the Statewide TIP and regionally significant non-Federal projects, are consistent with any adequate or approved motor vehicle emissions budget for all pollutants and precursors in applicable SIPs.	NA	
§93.118 (b)	Document for which years consistency with motor vehicle emissions budgets must be shown.	1	2018 2025 2035 2040
§93.118 (d)	Document the use of the appropriate analysis years in the regional emissions analysis for areas with SIP budgets, and the analysis results for these years. Document any interpolation performed to meet tests for years in which specific analysis is not required.	1-2	Yes. all meet
§93.119 [1]	For areas without applicable SIP budgets: Document that emissions from the transportation network for each applicable pollutant and precursor, including projects in any associated donut area that are in the Statewide TIP and regionally significant non-Federal projects, are consistent with the requirements of the "Action/Baseline", "Action/1990" and/or "Action/2002" interim emissions tests as applicable.	NA	
§93.119 (g)	Document the use of the appropriate analysis years in the regional emissions analysis for areas without applicable SIP budgets.	1-2	yes
§93.119 (h,i)	Document how the baseline and action scenarios are defined for each analysis year.	1-2	ok
§93.122 (a)(1)	Document that all regionally significant federal and non-Federal projects in the nonattainment/maintenance area are explicitly modeled in the regional emissions analysis. For each project, identify by which analysis it will be open to traffic. Document that VMT for non-regionally significant Federal projects is accounted for in the regional emissions analysis	3 TIP	ok
§93.122 (a)(2, 3)	Document that only emission reduction credits from TCMs on schedule have been included, or that partial credit has been taken for partially implemented TCMs. Document that the regional emissions analysis only includes emissions credit for projects, programs, or activities that require regulatory action if: the regulatory action has been adopted; the project, program, activity or a written commitment is included in the SIP; EPA has approved an opt-in to the program, EPA has promulgated the program, or the Clean Air Act requires the program (indicate applicable date). Discuss the implementation status of these programs and the associated emissions credit for each analysis year.	NA	
§93.122 (a)(4,5,6)	For nonregulatory measures that are not included in the STIP, include written commitments from appropriate agencies. Document that assumptions for measures outside the transportation system (e.g. fuels measures) are the same for baseline and action scenarios. Document that factors such as ambient temperature are consistent with those used in the SIP unless modified through interagency consultation.	NA	
§93.122 (b)(1)(i) [2]	Document that a network-based travel model is in use that is validated against observed counts for a base year no more than 10 years before the date of the conformity determination. Document that the model results have been analyzed for reasonableness and compared to historical trends and explain any significant differences between past trends and forecasts (for per capita vehicle-trips, VMT, trip lengths mode shares, time of day, etc.).	Table 2	ok
§93.122 (b)(1)(ii) [2]	Document the land use, population, employment, and other network-based travel model assumptions.	Table 2	ok
§93.122 (b)(1)(iii) [2]	Document how land use development scenarios are consistent with future transportation system alternatives, and the reasonable distribution of employment and residences for each alternative.	Table 2	ok
§93.122 (b)(1)(iv) [2]	Document use of capacity sensitive assignment methodology and emissions estimates based on a methodology that differentiates between peak and off-peak volumes and speeds, and bases speeds on final assigned volumes.	NA	

40 CFR	Criteria	Page	Comments
§93.122 (b)(1)(v) [2]	Document the use of zone-to-zone travel impedances to distribute trips in reasonable agreement with the travel times estimated from final assigned traffic volumes. Where transit is a significant factor, document that zone-to-zone travel impedances used to distribute trips are used to model mode split.	NA	—
§93.122 (b)(1)(vi) [2]	Document how travel models are reasonably sensitive to changes in time, cost, and other factors affecting travel choices.	NA	—
§93.122 (b)(2) [2]	Document that reasonable methods were used to estimate traffic speeds and delays in a manner sensitive to the estimated volume of travel on each roadway segment represented in the travel model.	NA	—
§93.122 (b)(3) [2]	Document the use of HPMS, or a locally developed count-based program or procedures that have been chosen through the consultation process, to reconcile and calibrate the network-based travel model estimates of VMT.	Table 2	yes.
§93.122 (d)	In areas not subject to §93.122(b), document the continued use of modeling techniques or the use of appropriate alternative techniques to estimate vehicle miles traveled	NA	—
§93.122 (e, f)	Document, in areas where a SIP identifies construction-related PM10 or PM 2.5 as significant pollutants, the inclusion of PM10 and/or PM 2.5 construction emissions in the conformity analysis.	NA	—
§93.122 (g)	If appropriate, document that the conformity determination relies on a previous regional emissions analysis and is consistent with that analysis.	NA	—
§93.126, §93.127, §93.128	Document all projects in the TIP/RTP that are exempt from conformity requirements or exempt from the regional emissions analysis. Indicate the reason for the exemption (Table 2, Table 3, traffic signal synchronization) and that the interagency consultation process found these projects to have no potentially adverse emissions impacts.	TP	ok

[1] Note that some areas are required to complete both interim emissions tests.

[2] 40 CFR 93.122(b) refers only to serious, severe and extreme ozone areas and serious CO areas above 200,000 population

Disclaimers

This checklist is intended solely as an informational guideline to be used in reviewing Transportation Plans and Transportation Improvement Programs for adequacy of their conformity documentation. It is in no way intended to replace or supercede the Transportation Conformity regulations of 40 CFR Parts 51 and 93, the Statewide and Metropolitan Planning Regulations of 23 CFR Part 450 or any other EPA, FHWA or FTA guidance pertaining to transportation conformity or statewide and metropolitan planning. This checklist is not intended for use in documenting transportation conformity for individual transportation projects in nonattainment or maintenance areas. 40 CFR Parts 51 and 93 contain additional criteria for project-level conformity determinations.

MAG

Conformity Analysis Documentation

FHWA Checklist for MPO TIPs/RTPs
February 18, 2005

40 CFR	Criteria	Page	Comments
§93.102	Document the applicable pollutants and precursors for which EPA designates the area as nonattainment or maintenance. Describe the nonattainment or maintenance area and its boundaries.	ES 4,12 ES-3 11-15	ok map
§93.104 (b, c)	Document the date that the MPO officially adopted, accepted or approved the TIP/RTP and made a conformity determination. Include a copy of the MPO resolution. Include the date of the last prior conformity finding.	cover	June 28, 2017 7-11-16
§93.104 (e)	If the conformity determination is being made to meet the timelines included in this section, document when the new motor vehicle emissions budget was approved or found adequate.	20-23	well detailed
§93.106 (a)(2)ii	Describe the regionally significant additions or modifications to the existing transportation network that are expected to be open to traffic in each analysis year. Document that the design concept and scope of projects allows adequate model representation to determine intersections with regionally significant facilities, route options, travel times, transit ridership and land use.	RTP TIP	ok
§93.108	Document that the TIP/RTP is financially constrained (23 CFR 450).	ch. 1	ok
§93.109 (a, b)	Document that the TIP/RTP complies with any applicable conformity requirements of air quality implementation plans (SIPs) and court orders.	Ch. 1	ok
§93.109 (c-k)	Provide either a table or text description that details, for each pollutant and precursor, whether the interim emissions tests and/or the budget test apply for conformity. Indicate which emissions budgets have been found adequate by EPA, and which budgets are currently applicable for what analysis years.	various	yes very detailed
§93.110 (a, b)	Document the use of latest planning assumptions (source and year) at the "time the conformity analysis begins," including current and future population, employment, travel and congestion. Document the use of the most recent available vehicle registration data. Document the date upon which the conformity analysis was begun.	chapter 3 starts on 25	ok
USDOT/EPA guidance	Document the use of planning assumptions less than five years old. If unable, include written justification for the use of older data. (1/18/02)	"	ok
§93.110 (c,d,e,f)	Document any changes in transit operating policies and assumed ridership levels since the previous conformity determination. Document the use of the latest transit fares and road and bridge tolls. Document the use of the latest information on the effectiveness of TCMs and other SIP measures that have been implemented. Document the key assumptions and show that they were agreed to through Interagency and public consultation.	NA	
§93.111	Document the use of the latest emissions model approved by EPA.	Ch4	ok
§93.112	Document fulfillment of the interagency and public consultation requirements outlined in a specific implementation plan according to §51.390 or, if a SIP revision has not been completed, according to §93.105 and 23 CFR 450. Include documentation of consultation on conformity tests and methodologies as well as responses to written comments.	cover and Appendix	ok. no comments were received
§93.113	Document timely implementation of all TCMs in approved SIPs. Document that implementation is consistent with schedules in the applicable SIP and document whether anything interferes with timely implementation. Document any delayed TCMs in the applicable SIP and describe the measures being taken to overcome obstacles to implementation.	Ch 5	ok
§93.114	Document that the conformity analyses performed for the TIP is consistent with the analysis performed for the Plan, in accordance with 23 CFR 450.324(f)(2).		ok

40 CFR	Criteria	Page	Comments
§93.118 (a, c, e)	For areas with SIP budgets: Document that emissions from the transportation network for each applicable pollutant and precursor, including projects in any associated donut area that are in the Statewide TIP and regionally significant non-Federal projects, are consistent with any adequate or approved motor vehicle emissions budget for all pollutants and precursors in applicable SIPs.	23	ok
§93.118 (b)	Document for which years consistency with motor vehicle emissions budgets must be shown.	23	2018 2025 2035 2040
§93.118 (d)	Document the use of the appropriate analysis years in the regional emissions analysis for areas with SIP budgets, and the analysis results for these years. Document any interpolation performed to meet tests for years in which specific analysis is not required.	23	
§93.119 [1]	For areas without applicable SIP budgets: Document that emissions from the transportation network for each applicable pollutant and precursor, including projects in any associated donut area that are in the Statewide TIP and regionally significant non-Federal projects, are consistent with the requirements of the "Action/Baseline", "Action/1990" and/or "Action/2002" interim emissions tests as applicable.	23	
§93.119 (g)	Document the use of the appropriate analysis years in the regional emissions analysis for areas without applicable SIP budgets.	23	2018 2025 2035 2040
§93.119 (h,i)	Document how the baseline and action scenarios are defined for each analysis year.	23	
§93.122 (a)(1)	Document that all regionally significant federal and non-Federal projects in the nonattainment/maintenance area are explicitly modeled in the regional emissions analysis. For each project, identify by which analysis it will be open to traffic. Document that VMT for non-regionally significant Federal projects is accounted for in the regional emissions analysis	TIP RTP	ok
§93.122 (a)(2, 3)	Document that only emission reduction credits from TCMs on schedule have been included, or that partial credit has been taken for partially implemented TCMs. Document that the regional emissions analysis only includes emissions credit for projects, programs, or activities that require regulatory action if: the regulatory action has been adopted; the project, program, activity or a written commitment is included in the SIP; EPA has approved an opt-in to the program, EPA has promulgated the program, or the Clean Air Act requires the program (indicate applicable date). Discuss the implementation status of these programs and the associated emissions credit for each analysis year.	Ch. 5	ok
§93.122 (a)(4,5,6)	For nonregulatory measures that are not included in the STIP, include written commitments from appropriate agencies. Document that assumptions for measures outside the transportation system (e.g. fuels measures) are the same for baseline and action scenarios. Document that factors such as ambient temperature are consistent with those used in the SIP unless modified through interagency consultation.	NA	
§93.122 (b)(1)(i) [2]	Document that a network-based travel model is in use that is validated against observed counts for a base year no more than 10 years before the date of the conformity determination. Document that the model results have been analyzed for reasonableness and compared to historical trends and explain any significant differences between past trends and forecasts (for per capita vehicle-trips, VMT, trip lengths mode shares, time of day, etc.).	Ch 3	Detailed info.
§93.122 (b)(1)(ii) [2]	Document the land use, population, employment, and other network-based travel model assumptions.	Ch 2	ok
§93.122 (b)(1)(iii) [2]	Document how land use development scenarios are consistent with future transportation system alternatives, and the reasonable distribution of employment and residences for each alternative.	Ch 2	ok
§93.122 (b)(1)(iv) [2]	Document use of capacity sensitive assignment methodology and emissions estimates based on a methodology that differentiates between peak and off-peak volumes and speeds, and bases speeds on final assigned volumes.	Ch 2	ok

40 CFR	Criteria	Page	Comments
§93.122 (b)(1)(v) [2]	Document the use of zone-to-zone travel impedances to distribute trips in reasonable agreement with the travel times estimated from final assigned traffic volumes. Where transit is a significant factor, document that zone-to-zone travel impedances used to distribute trips are used to model mode split.	Ch 2	ok
§93.122 (b)(1)(vi) [2]	Document how travel models are reasonably sensitive to changes in time, cost, and other factors affecting travel choices.	ch 2	ok
§93.122 (b)(2) [2]	Document that reasonable methods were used to estimate traffic speeds and delays in a manner sensitive to the estimated volume of travel on each roadway segment represented in the travel model.	ch 2-3	ok
§93.122 (b)(3) [2]	Document the use of HPMS, or a locally developed count-based program or procedures that have been chosen through the consultation process, to reconcile and calibrate the network-based travel model estimates of VMT.	ch 2 3	ok
§93.122 (d)	In areas not subject to §93.122(b), document the continued use of modeling techniques or the use of appropriate alternative techniques to estimate vehicle miles traveled	NA	
§93.122 (e, f)	Document, in areas where a SIP identifies construction-related PM10 or PM 2.5 as significant pollutants, the inclusion of PM10 and/or PM 2.5 construction emissions in the conformity analysis.	Ch 4	Yes.
§93.122 (g)	If appropriate, document that the conformity determination relies on a previous regional emissions analysis and is consistent with that analysis.	NA	
§93.126, §93.127, §93.128	Document all projects in the TIP/RTP that are exempt from conformity requirements or exempt from the regional emissions analysis. Indicate the reason for the exemption (Table 2, Table 3, traffic signal synchronization) and that the interagency consultation process found these projects to have no potentially adverse emissions impacts.	TIP RTP	yes

[1] Note that some areas are required to complete both interim emissions tests.

[2] 40 CFR 93.122(b) refers only to serious, severe and extreme ozone areas and serious CO areas above 200,000 population

Disclaimers

This checklist is intended solely as an informational guideline to be used in reviewing Transportation Plans and Transportation Improvement Programs for adequacy of their conformity documentation. It is in no way intended to replace or supercede the Transportation Conformity regulations of 40 CFR Parts 51 and 93, the Statewide and Metropolitan Planning Regulations of 23 CFR Part 450 or any other EPA, FHWA or FTA guidance pertaining to transportation conformity or statewide and metropolitan planning. This checklist is not intended for use in documenting transportation conformity for individual transportation projects in nonattainment or maintenance areas. 40 CFR Parts 51 and 93 contain additional criteria for project-level conformity determinations.

SunCorridor
Metropolitan Planning Organization

June 14, 2017

Ms. Karla Petty, Administrator
Arizona Division, Federal Highway Administration
4000 North Central Avenue, Suite 1500
Phoenix, Arizona 85012

Dear Ms. Petty:

The Sun Corridor Metropolitan Planning Organization (MPO) is requesting that the Federal Highway Administration and Federal Transit Administration initiate the process to make a new conformity determination with respect to a proposed amendment to the FY 2016-2025 Sun Corridor MPO Transportation Improvement Program (TIP) and the Regional Transportation Plan (RTP) 2040 for the Pinal County PM-10 and PM-2.5 nonattainment areas. On June 13, 2017, the Sun Corridor MPO Executive Board approved a new Finding of Conformity for the proposed amendment to the FY 2016-2025 Sun Corridor MPO TIP and RTP 2040.

On April 26, 2017, the Sun Corridor MPO transmitted a conformity assessment that included the 2017 Conformity Analysis for the FY 2016-2025 Sun Corridor MPO TIP and RTP 2040 to you for consultation.

In addition, the FY 2016-2025 Sun Corridor MPO TIP, RTP 2040, and the 2017 Conformity Assessment were made available on the Sun Corridor MPO website for the 30-day public review period beginning on April 26, 2017. No comments were received from the public.

Supporting documentation on the conformity assessment for the proposed amendment to the FY 2016-2025 Sun Corridor MPO TIP, RTP 2040, and 2017 Conformity Analysis, is enclosed.

If you have any questions, please contact me at (520) 705-5143.

Sincerely,

Irene Higgs

Irene Higgs
Sun Corridor MPO Executive Director

Enclosure

MARICOPA ASSOCIATION of GOVERNMENTS

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50th Anniversary 1967-2017

June 29, 2017

Ms. Karla Petty, Administrator
Federal Highway Administration, Arizona Division
4000 North Central Avenue, Suite 1500
Phoenix, Arizona 85012

Dear ~~Ms. Petty:~~ Karla

On June 28, 2017, the Maricopa Association of Governments Regional Council approved the FY 2018-2022 MAG Transportation Improvement Program, the 2040 MAG Regional Transportation Plan, and 2017 MAG Conformity Analysis. At this time, it is requested that the Federal Highway Administration and Federal Transit Administration initiate the process to make a joint conformity determination with respect to the FY 2018-2022 MAG Transportation Improvement Program and 2040 MAG Regional Transportation Plan for the Maricopa nonattainment and maintenance areas and the Pinal nonattainment areas.

On April 26, 2017, MAG transmitted copies of the Draft FY 2018-2022 MAG Transportation Improvement Program, Draft 2040 MAG Regional Transportation Plan, and Draft 2017 MAG Conformity Analysis for consultation. The draft documents were the subject of a public hearing on May 9, 2017 and comments were requested by May 25, 2017. Comments and responses regarding the Draft FY 2018-2022 MAG Transportation Improvement Program and 2040 MAG Regional Transportation Plan are documented in the FY 2017 MAG Final Phase Input Opportunity Report. No comments were received on the Draft Conformity Analysis.

We are transmitting copies of the FY 2018-2022 MAG Transportation Improvement Program, 2040 MAG Regional Transportation Plan, and the 2017 MAG Conformity Analysis. In addition, a copy of the FY 2017 Mid-Phase and Final Phase Input Opportunity reports is enclosed.

If you have any questions about these documents, please contact Dean Giles at (602) 254-6300.

Sincerely,

Dennis Smith
Executive Director

Enclosures

cc: Ed Stillings, FHWA Arizona Division