



U.S. Department  
of Transportation

**Federal Highway Administration**

Arizona Division

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**Federal Transit Administration**

Region IX

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August 1, 2019

In Reply Refer To:

(TRAP 19 – MPO)

Tucson Non-attainment Area  
Pima Association of Governments  
Conformity Finding  
(Maintenance Area)

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

Dear Mr. <sup>Farhad</sup>Moghimi:

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 Pima Association of Governments (PAG) finding of conformity and related documentation submitted in your June 13, 2019 letter, 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 Tucson, Arizona urbanized area has met the requirements of the EPA Transportation Conformity Rule (40 CFR Parts 51 and 93).

A Finding of Conformity is hereby made with respect to the unchanged 2045 Regional Mobility and Accessibility Plan and FY 2020-2024 Transportation Improvement Program (TIP) as approved by PAG Regional Council on May 23, 2019. A Finding of Conformity was made previously on the 2045 Regional Mobility and Accessibility Plan and the FY 2018-2022 TIP on July 7, 2017.

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.

If you have questions or would like additional information, please contact Mr. Ed Stillings of FHWA Arizona Division at (602) 382-8966 or [ed.stillings@dot.gov](mailto:ed.stillings@dot.gov); or Ms. Dominique Kraft of FTA Region IX at (415) 734-9469 or [dominique.kraft@dot.gov](mailto:dominique.kraft@dot.gov).

Sincerely,

A handwritten signature in blue ink that reads "Karla S. Petty". The signature is written in a cursive style with a large, stylized "K" and "P".

Karla S. Petty  
Division Administrator  
FHWA Arizona Division

cc: [Fmoghimip@pagregion.com](mailto:Fmoghimip@pagregion.com); Gregory Byres ADOT ([gbyres@azdot.gov](mailto:gbyres@azdot.gov)), Dominique Kraft (FTA Region 9), Jerry Wamsley EPA ([wamsley.jerry@epa.gov](mailto:wamsley.jerry@epa.gov)); [banderson@azdot.gov](mailto:banderson@azdot.gov); [bchenausky@azdot.gov](mailto:bchenausky@azdot.gov)



June 13, 2019

Ms. Karla Petty, Division Administrator  
Federal Highway Administration – Arizona Division  
4000 N. Central Ave., Suite 1500  
Phoenix, AZ 85012-3500

Dear Ms. Petty:

This transmittal constitutes a formal request for a finding of transportation conformity by the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) for Pima Association of Governments' (PAG) 2020-2024 Transportation Improvement Program (TIP). The PAG Regional Council made a transportation conformity determination on May 23, 2019, for the 2020-2024 TIP. In support of this request, PAG is submitting the TIP 2020-2024 Public Hearing Final Action Report from the PAG Regional Council, to indicate the unanimous approval of the 2020-2024 TIP and the air quality conformity determination.

State Implementation Plan (SIP) transportation control measures continue to be implemented on schedule as required by 40 CFR 93.113; the PAG 2020-2024 TIP complies with the fiscal constraint requirement as required by 40 CFR 93.108; the interagency consultation procedures required by 40 CFR 93.105 are being met; no adverse comments regarding conformity were received during the public participation process held by PAG policy and planning committees, and no carbon monoxide (CO) monitors in the Tucson Air Planning area exceeded 7.65 ppm CO during the past five years (85 percent of the National Ambient Air Quality Standard for CO).

Thank you for your consideration of this request. Should you have any questions regarding this matter, please contact Nathan Barrett, PAG Senior Transportation Planner at [nbarrett@pagregion.com](mailto:nbarrett@pagregion.com) or call (520) 495-1093, at your convenience.

Sincerely,



Farhad Moghimi, Executive Director  
Pima Association of Governments

June 17, 2019