



30 August 2021

Edward Woolford
Federal Highway Administration
2520 West 4700 South, Suite 9A
Salt Lake City, UT 84118

RE: Conformity Determination for the Mountainland MPO Transportation Improvement Program 2022-2026

Dear Ed,

Attached you will find the Mountainland MPO Transportation Improvement Program 2022-2026 document (TIP). The final document was approved by the Regional Planning Committee in their 05 August 2021 meeting.

The 30-day public comment period for the TIP concluded on August 3rd. No comments that would have impacted the proposed projects were received.

The current Transportation Authorization Bill - the Surface Transportation Reauthorization Act of 2021 - and the Clean Air Act Amendments (CAAA) require that all regionally significant highway and transit projects in air quality non-attainment and maintenance areas be derived from a "conforming" Transportation Plan (Plan) and Transportation Improvement Program (TIP).

A conforming Plan is one which has been analyzed for emissions of controlled air pollutants and found to satisfy emission level limits established in the State Implementation Plan (SIP) for air quality and must meet the requirements of EPA's Conformity Regulations for the Utah County and Provo City non-attainment areas. These conformity analyses are made by the Mountainland MPO, as the Metropolitan Planning Organization (MPO) for the region, and then submitted to the Utah Department of Transportation, the Federal Highway Administration, and the Federal Transit Administration for their concurrence. This conformity determination has been prepared under the appropriate conformity regulations issued jointly by the EPA and US Department of Transportation.

Section 93.122(g)(1) of the Transportation Conformity Rule (40 CFR part 93) states, "The TIP may be demonstrated to [conform]... without new regional emissions analysis if the regional emissions analysis already performed for the plan also applies to the TIP."

This section includes the following three conditions. First, the TIP must include all projects that must be started within the TIP timeframe in order to achieve the transportation network envisioned in the



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Plan. Secondly, all regionally significant projects in the TIP are included in the regional emissions analysis. Third, the design concept and scope for TIP projects have not changed significantly from the plan.

Long Range Transportation Plan Conformity

The 2050 Mountainland MPO Plan as of August 2020 was found to conform to state air quality requirements as documented in MAG's Air Quality Conformity analysis dated August 2020. FHWA and FTA had concurred with this analysis in their conformity finding memorandum dated 14 August 2020. The submitted TIP contains projects that are consistent with the 2050 MAG Plan, and are included in the regional emissions analysis.

Regional Significance

All regionally significant projects, regardless of funding source (federal, state, or local) are included in the TIP and Plan. All regionally significant projects are also included in the regional emissions analysis of the Plan.

Concept and Scope

The design concept and scope of all regionally significant projects in the TIP have not changed significantly from the design and scope identified in the Plan. The TIP and Plan were developed simultaneously and therefore projects that require conformity analysis are derived from the new Plan.

In conclusion:

The FY 2022 MPO TIP conforms to the applicable controls and goals of the State Implementation Plan for PM10 in Utah County. All projects in Utah County included in the TIP may go forward.

The FY 2022 MPO TIP conforms to the applicable controls and goals of the State Implementation Plan for PM2.5 in Utah County. All projects in Utah County included in the TIP may go forward.

The FY 2022 MPO TIP conforms to the applicable controls and goals required for Carbon Monoxide in Provo City. All projects in Provo City included in the TIP may go forward.

The FY 2022 MPO TIP for Utah County meets the conditions of CFR 93.122(G)(1) and therefore conforms to the State Implementation Plans for air quality for all applicable non-attainment and maintenance areas and pollutants. Therefore, all the transportation projects in Utah County included in this TIP may be found to conform.



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Please let me know if I can assist you with any questions you may have.

Sincerely,

Shauna K Mecham

Air Quality Program Manager

CC: Kevin Osborn, FTA
Becky Close, EPA
Elden Bingham, UDOT
Richard McKeague III, DAQ
Robert Allen, MAG