

Transportation Conformity Demonstration:

*Update: Connections 2050 Long-Range Plan,
FFY 2026 TIP for New Jersey,
FFY 2025 TIP for Pennsylvania*



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The Delaware Valley Regional Planning Commission (DVRPC) is the federally designated Metropolitan Planning Organization for the Greater Philadelphia region, established by an Interstate Compact between the Commonwealth of Pennsylvania and the State of New Jersey. Members include Bucks, Chester, Delaware, Montgomery, and Philadelphia counties, plus the City of Chester, in Pennsylvania; and Burlington, Camden, Gloucester, and Mercer counties, plus the cities of Camden and Trenton, in New Jersey.

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Glossary of Acronyms and Terms

AQ	Air Quality	Nonattainment Area	Area currently not meeting the NAAQS
CAA	Clean Air Act (as amended)	NO_x	Nitrogen Oxides
CFR	Code of Federal Regulations	NRS	Not Regionally Significant
CO	Carbon Monoxide	PATCO	Port Authority Transit Corporation
DEP	State Department of Environmental Protection	PennDOT	Pennsylvania Department of Transportation
DOT	State Department of Transportation	PM	Particulate Matter
DRPA	Delaware River Port Authority	PM_{2.5}	Fine Particulate Matter
DVRPC	Delaware Valley Regional Planning Commission	PM₁₀	Coarse Particulate Matter
FHWA	Federal Highway Administration	ppm	Parts per Million
Final Rule	Current conformity guidance under CAA	SIP	State Implementation Plan
FR	<i>Federal Register</i>	SEPTA	Southeastern Pennsylvania Transportation Authority
FTA	Federal Transit Administration	SO_x	Sulfur Oxides
FY	Fiscal Year	TAZ	Traffic Analysis Zone
LRP	DVRPC's Long-Range Plan	TCICG	Transportation Conformity Interagency Consultation Group
Maintenance Area	Area that previously did not meet NAAQS	TCM	Transportation Control Measure
MOVES	Motor Vehicle Emissions Simulator: the most recent emissions estimation model approved by the U.S. EPA	TDM	Travel Demand Model
MPO	Metropolitan Planning Organization	TIP	Transportation Improvement Program
MVEB	Motor Vehicle Emissions Budget	U.S.C.	U.S. Code
NAAQS	National Ambient Air Quality Standards	U.S. EPA	U.S. Environmental Protection Agency
NH₃	Ammonia	VMT	Vehicle Miles Traveled
NJT	New Jersey Transit	VOCs	Volatile Organic Compounds

Executive Summary

Where is Transportation Conformity required?

Nonattainment Areas:

a region that currently does not meet the NAAQS.

Maintenance Areas:

a region that **previously** violated air quality standards but currently meets the standards and has an approved Clean Air Act (CAA) section 175(a) maintenance plan.

Overview

Transportation conformity is the process by which metropolitan planning organizations (MPOs) or departments of transportation (DOTs) demonstrate that transportation projects included in a region's Long-Range Plan (LRP) or Transportation Improvement Program (TIP) do not cause new air quality violations, worsen existing violations, or delay timely attainment of the National Ambient Air Quality Standards (NAAQS).

A transportation conformity demonstration is required at least once every four years or when an MPO: (1) adopts a new LRP or TIP; or (2) amends, adds, or deletes a regionally significant, nonexempt project in a LRP or TIP. This conformity demonstration is required due to a new long-range plan, *Update: Connections 2050*; a new Draft Federal Fiscal Year (FFY) 2026-2029 TIP for New Jersey; and amendments to the FFY 2025-2028 TIP for Pennsylvania.

The Delaware Valley Regional Planning Commission (DVRPC) region includes a complex combination of nonattainment and maintenance areas for ozone and fine particulate matter (PM_{2.5}). The region's ozone nonattainment area encompasses the entire nine-county DVRPC region, while the PM_{2.5} maintenance areas encompass various portions of the region. The region is required to demonstrate transportation conformity for each of these standards in each of the appropriate geographic areas covered by the nonattainment and maintenance areas.

This Executive Summary highlights DVRPC's conformity demonstration for:

Volatile Organic Compounds (VOCs) and Nitrogen Oxides (NO_x) meeting the 1997, 2008, and 2015 Eight-Hour Ozone NAAQS requirements in:

- the DVRPC portion of the Philadelphia–Wilmington–Atlantic City, PA–NJ–MD–DE Ozone Nonattainment Area; and

Direct PM_{2.5} and precursor NO_x meeting the 2006 24-Hour and 2012 Annual PM_{2.5} NAAQS requirements in:

- the DVRPC portion of the Philadelphia–Wilmington, PA–NJ–DE 24-Hour PM_{2.5} Maintenance Area,
- the DVRPC portion of the New York–Northern New Jersey–Long Island, NY–NJ–CT 24-Hour PM_{2.5} Maintenance Area, and
- the Delaware County, PA Annual PM_{2.5} Maintenance Area.

This summary serves as an inclusive document that demonstrates the transportation conformity of the Draft DVRPC Long-Range Plan, Draft TIP for New Jersey, and TIP for Pennsylvania with all applicable SIPs and NAAQS requirements for the above pollutants within the noted areas.

Analysis Approach

Regional Emissions Analysis of LRP and TIP Projects

The federal Final Conformity Rule (Final Rule) requires that all regionally significant and nonexempt projects that are funded in the Long-Range Plan and TIP be included in the regional transportation conformity analysis. Areas designated as nonattainment or maintenance areas must conduct a regional emissions analysis to demonstrate conformity. Emissions analysis is conducted by including all existing and planned, regionally significant and non-exempt projects from the LRP and TIP in the regional Travel Demand Model (TDM). Emissions from those modeled projects are then quantified using the latest U.S. Environmental Protection Agency (U.S. EPA) approved emissions modeling system, in this case the Motor Vehicle Emissions Simulator version 5 (MOVES 5).

Areas that have demonstrated maintenance of the NAAQS for ten years are eligible for a limited maintenance plan. Once that plan is approved by U.S. EPA, emissions analyses are no longer required to demonstrate transportation conformity for that NAAQS. The U.S. EPA approved limited maintenance plans for PM_{2.5} in New Jersey in March 2024. All other conformity requirements still apply to the PM_{2.5} NAAQS in New Jersey.

Conformity Test

Modeled emissions results from the projects in the LRP and TIPs are then compared to Motor Vehicle Emissions Budgets (MVEBs) contained in the SIPs to meet the NAAQS. When modeled emissions are less than the SIP budgets, the transportation conformity requirements have been met. This process is referred to as the “budget test.”

New Jersey and Pennsylvania have approved SIP MVEBs for the 1997 Eight-Hour Ozone Standard. Pennsylvania has approved budgets for the 2006 24-Hour PM_{2.5} standards, and 2012 Annual PM_{2.5} standards. Future SIP revisions may make the emissions budgets stricter or establish additional budgets for future years. Figures 5 and 6 provide examples of emissions budgets becoming stricter over time. Emissions budgets are used to demonstrate conformity for all of the current NAAQs requirements.

Analysis Years

When performing the budget test, DVRPC identifies a series of analysis years. Analysis years are benchmarks for the projects that are included in the TDM and emissions analysis. All projects that are expected to be open to traffic by the beginning of that analysis year are included in that year’s emissions analysis. The Final Rule includes guidance on the selection of analysis years. Analysis years must include SIP budget years, NAAQS attainment dates, the final year of the LRP, and interim analysis years that are no more than 10 years apart extending out to the horizon year of the LRP.

MVEBs are established in each state’s SIP for specific years. The MVEBs set the emissions limits moving forward. For example, the 2025 PM_{2.5} SIP budgets in Pennsylvania establish emissions limits for all projects that are open to traffic after 2025 and until such time as a new SIP budget is approved by the U.S. EPA.

To demonstrate conformity for the ozone NAAQS, projected VOC and NO_x emissions in all analysis years must be below the SIP MVEBs for the given analysis years. VOCs and NO_x, which are heat-sensitive ozone precursors, are estimated for a typical summer week workday.

To demonstrate conformity for the PM_{2.5} NAAQS, emissions are estimated for direct PM_{2.5} and the PM_{2.5} precursor chemical NO_x. The SIP budgets for PM_{2.5} are expressed in terms of annual emissions; therefore, conformity analyses are conducted for annual PM_{2.5} emissions.

In the DVRPC region, the analysis years are 2026, 2030, 2040, and 2050.

Table 1. identifies the mobile source emissions analysis years for this conformity demonstration.

Table 1: Mobile Source Analysis Years

Year	Ozone	PM _{2.5} (PA only)	Note
2026	√	√	2015 Ozone Attainment Year
2030	√	√	PM2.5 SIP budget year and interim year
2040	√	√	Year within 10 years of previous analysis
2050	√	√	DVRPC Long-Range Plan horizon year

Source: DVRPC, 2025

Findings

The DVRPC LRP and TIPs are found to be in conformity with the current New Jersey and Pennsylvania SIPs under the CAA. The forecasted emissions levels of VOCs, NO_x, and PM_{2.5} do not exceed the respective budgets established by the states' departments of environmental protection (DEPs) in accordance with the Final Rule under the current NAAQS governing applicable pollutants.

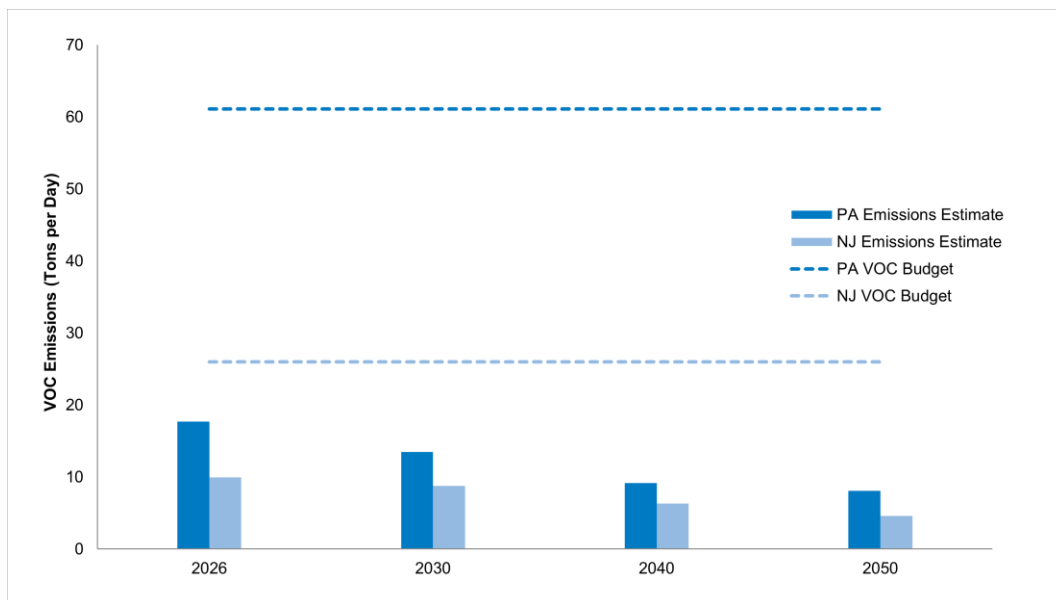
The transportation conformity analysis meets all applicable conformity criteria, including, but not limited to, the following:

- that the LRP and the TIPs are fiscally constrained [40 CFR 93.108];
- that this determination is based on the latest planning assumptions [40 CFR 93.110];
- that this determination is based on the latest emissions estimation model available [40 CFR 93.111];
- that DVRPC has made the determination according to the applicable consultation procedures [40 CFR 93.112];
- that the LRP and the TIPs do not interfere with the timely implementation of transportation control measures (TCMs)¹ [40 CFR 93.113]; and
- that the LRP and the TIPs are consistent with the MVEBs in the applicable SIPs [40 CFR 93.118].

Figures 1 through 6 detail the emissions analysis results for transportation projects included in the LRP and TIPs for New Jersey and Pennsylvania. The data for these figures is detailed beginning on page 25 of the full conformity document. These estimates of emissions results confirm that the transportation projects in the LRP and TIP conform to the respective SIP and Final Rule conformity requirements.

¹TCMs are strategies that reduce transportation-related air pollution and fuel use by reducing vehicle miles traveled and improving roadway operations.

Figure 1: VOCs Emissions Analysis Results (Tons/Day) for the DVRPC Region

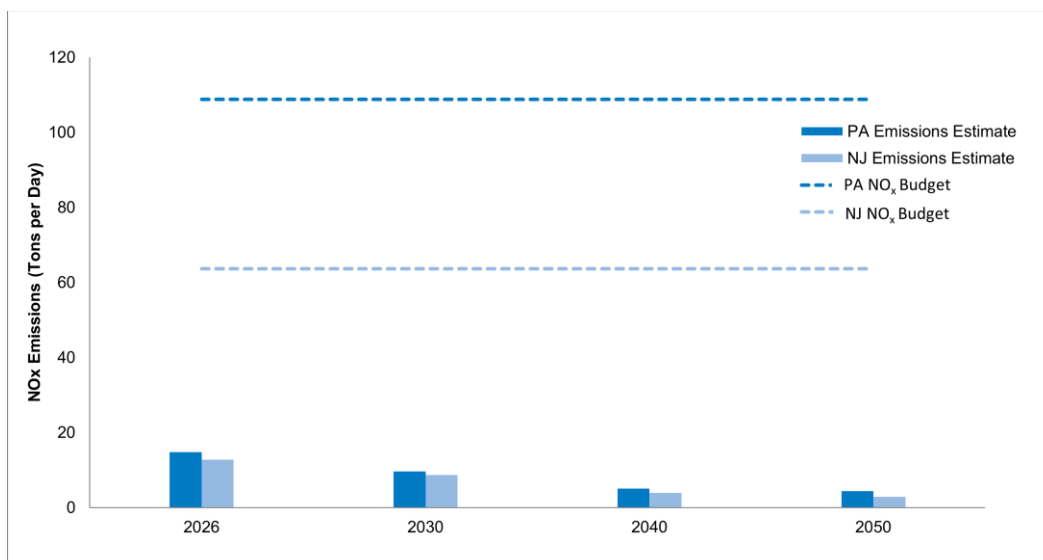


The most recent Eight-Hour Ozone SIP MVEBs apply to all future analysis years.

Source: DVRPC, 2025

The current VOC emissions in the Pennsylvania subregion are estimated at 17.71 tons per day and are projected to decline to 8.08 tons per day by 2050. This is well below the SIP budget of 61.09 tons per day. In the New Jersey subregion emissions are estimated at 9.93 tons per day and are projected to decline to 4.59 tons per day by 2050. This is well below the SIP budget of 25.98 tons per day.

Figure 2: NO_x Emissions Analysis Results (Tons/Day) for the DVRPC Region

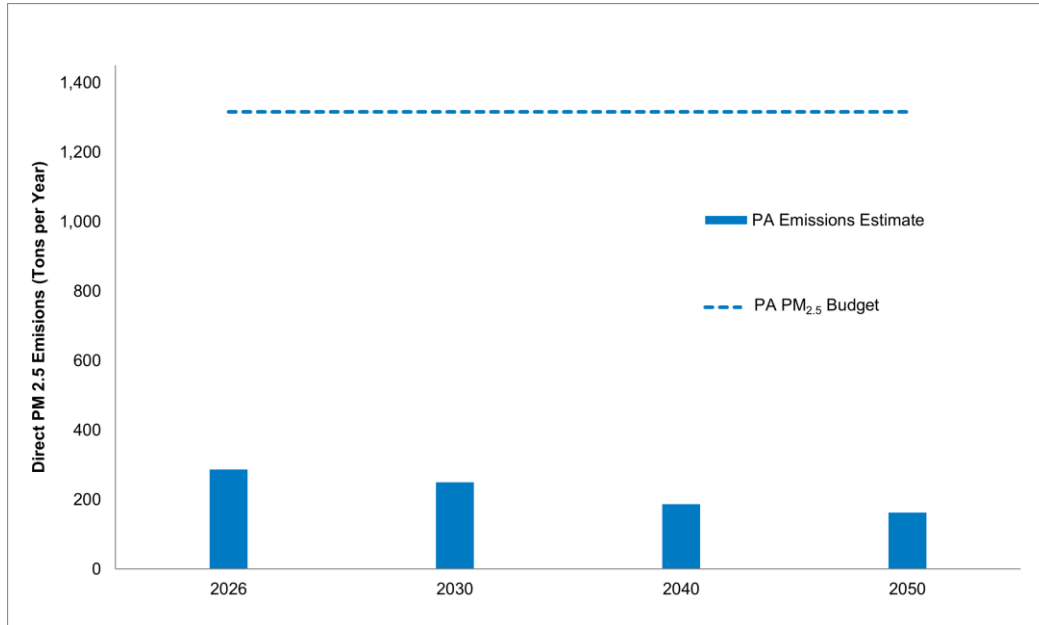


The most recent Eight-Hour Ozone SIP MVEBs apply to all future analysis years.

Source: DVRPC, 2025

The current NO_x emissions in the Pennsylvania subregion are estimated at 14.79 tons per day and are projected to decline to 4.37 tons per day by 2050. This is well below the SIP budget of 108.78 tons per day. In the New Jersey subregion emissions are estimated at 12.80 tons per day and are projected to decline to 2.84 tons per day by 2050. This is well below the SIP budget of 63.66 tons per day.

Figure 3: 24-Hour Direct PM_{2.5} Emissions Analysis Results (Tons/Year) for the DVRPC Region

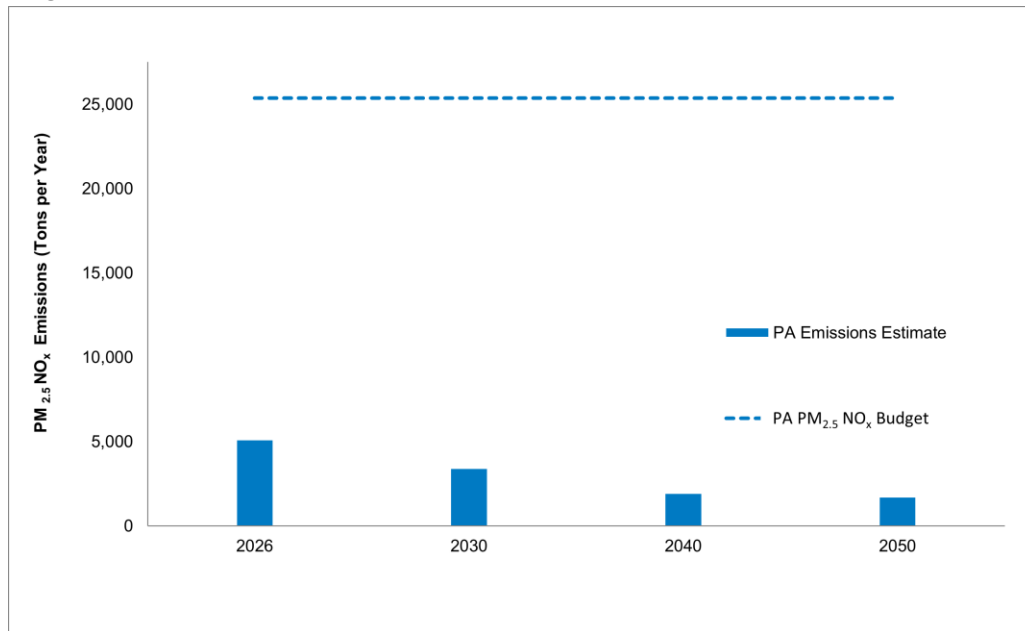


The most recent MVEBs apply to all future analysis years.

Source: DVRPC, 2025

The current Direct PM_{2.5} emissions in the Pennsylvania subregion are estimated at 340 tons per year and are projected to decline to 194 tons per year by 2050. This is well below the SIP budget of 1,316 tons per year.

Figure 4: 24-Hour NO_x Precursor Emissions Analysis Results (Tons/Year) for the DVRPC Region

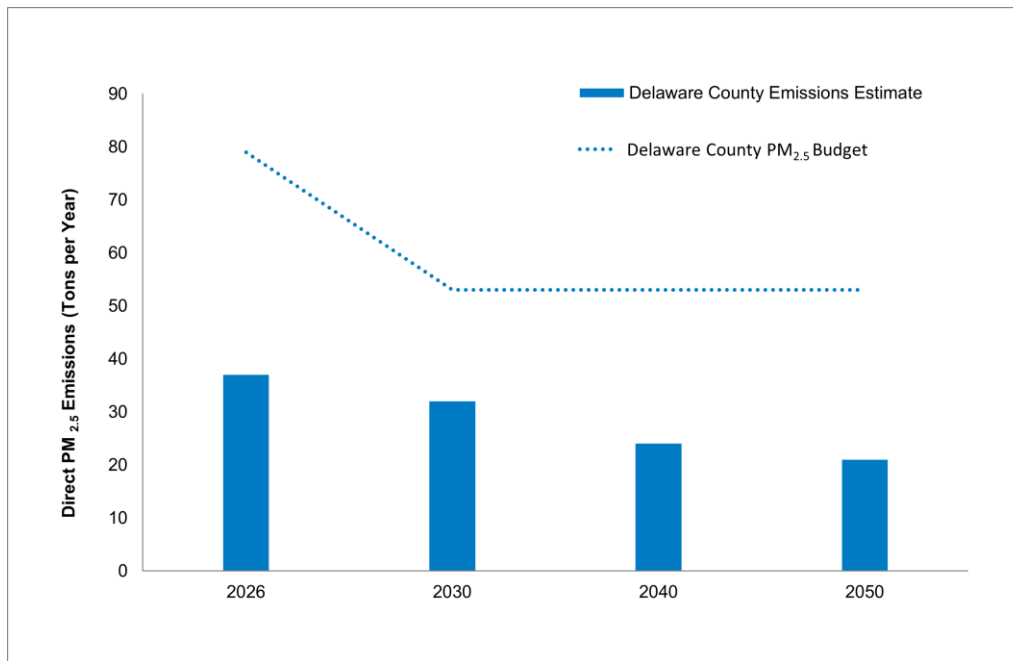


The most recent MVEBs apply to all future analysis years.

Source: DVRPC, 2025

The current Precursor NO_x PM_{2.5} emissions in the Pennsylvania subregion are estimated at 7,160 tons per year and are projected to decline to 2,284 tons per year by 2050. This is well below the SIP budget of 25,361 tons per year.

Figure 5: Delaware County Annual Direct PM_{2.5} Emissions Analysis Results (Tons/Year) for Delaware County, Pennsylvania

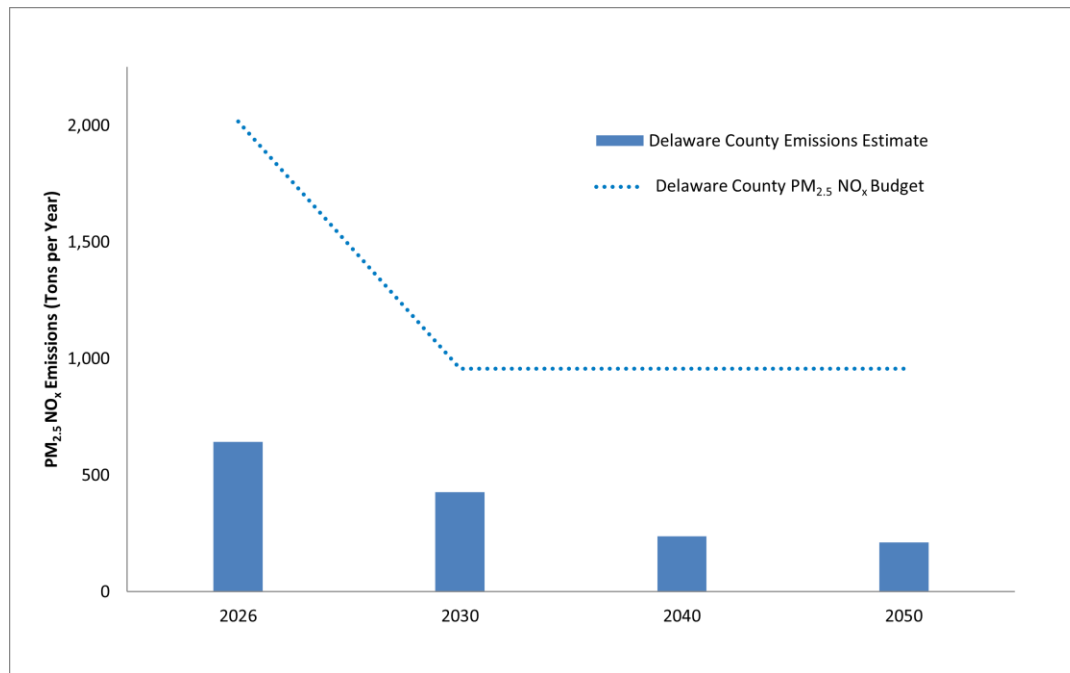


The most recent MVEBs apply to all future analysis years.

Source: DVRPC, 2025

The current Direct PM_{2.5} emissions in the Delaware County, Pennsylvania subregion are estimated at 37 tons per year and are projected to decline to 21 tons per year by 2050. This is well below the SIP budget of 79 tons per year.

Figure 6: Delaware County Annual NO_x Precursor Emissions Analysis Results (Tons/Year) for Delaware County, Pennsylvania



The most recent MVEBs apply to all future analysis years.

Source: DVRPC, 2025

The current Precursor NO_x PM_{2.5} emissions in the Pennsylvania subregion are estimated at 643 tons per year and are projected to decline to 211 tons per year by 2050. This is well below the SIP budget of 2,016 tons per year.

These findings demonstrate transportation conformity of the DVRPC Draft *Update: Connections 2050* Long-Range Plan, Draft FFY 2026 TIP for New Jersey, and FFY 2025 TIP for Pennsylvania with the state SIPs and the Final Rule requirements under CAA, including:

- the 1997, 2008, and 2015 Eight-Hour Ozone NAAQS in the Philadelphia–Wilmington–Atlantic City, PA–NJ–MD–DE Ozone Nonattainment Area;
- the 2006 24-Hour PM_{2.5} NAAQS in the Philadelphia–Wilmington, PA–NJ–DE PM_{2.5} Maintenance Area;
- the 2006 24-Hour PM_{2.5} NAAQS in the New York–Northern New Jersey–Long Island, NY–NJ–CT Annual and 24-Hour PM_{2.5} Maintenance Area, and
- the 2012 Annual PM_{2.5} Delaware County, PA Maintenance Area.

CHAPTER 1: Introduction

Overview

This report demonstrates that DVRPC's *Update: Connections 2050* Long-Range Plan, FFY 2026 TIP for New Jersey, and FFY 2025 TIP for Pennsylvania conform with the relevant state SIPs and applicable NAAQS requirements under the CAA, as amended.

Specifically, transportation conformity is demonstrated for the following NAAQS and designation areas:

VOCs and NO_x meeting the 1997, 2008, and 2015 Eight-Hour Ozone NAAQS requirements in:

- the DVRPC portion of the Philadelphia–Wilmington–Atlantic City, PA–NJ–MD–DE Ozone Nonattainment Area; and

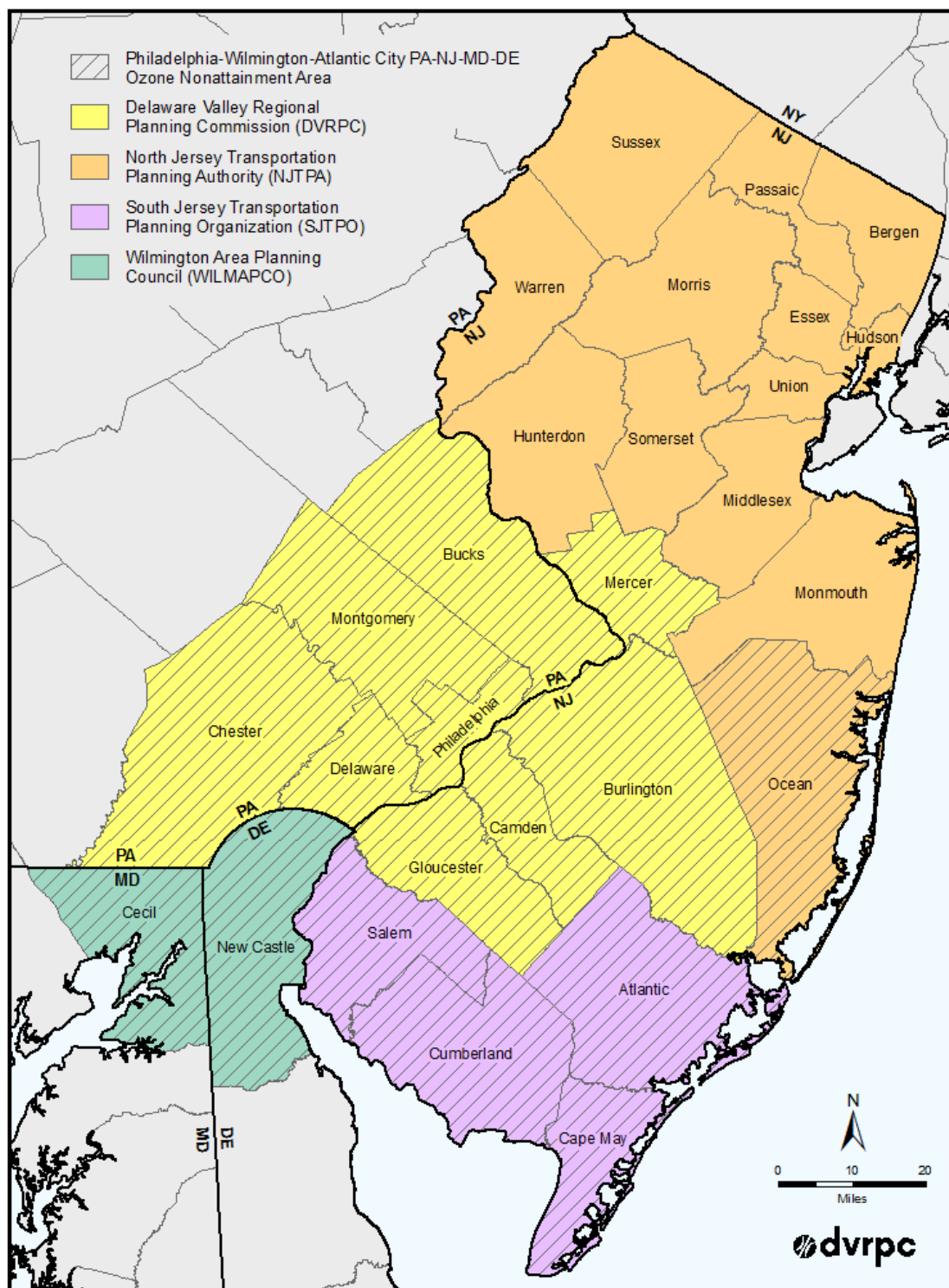
Direct PM_{2.5} and precursor NO_x meeting the 2006 24-Hour and 2012 Annual PM_{2.5} NAAQS requirements in:

- the DVRPC portions of the Philadelphia–Wilmington, PA–NJ–DE 24-Hour PM_{2.5} Maintenance Area,
- the DVRPC portion of the New York–Northern New Jersey–Long Island, (NY–NJ–CT) 24-Hour PM_{2.5} Maintenance Area; and
- the Delaware County, PA Annual PM_{2.5} Maintenance Area.

In July 2013, the U.S. EPA revoked the 1997 Ozone Standard with the publication of the Implementation Rule for the 2008 Ozone Standard. In February 2018, the District of Columbia Court of Appeals ruled in the case of *South Coast Air Quality Management District v. EPA* that the implementation of this revocation of the standard violated the CAA. Subsequent court rulings and U.S. EPA guidance declared that states with SIP budgets whose 1997 Ozone Nonattainment Areas are contained within the 2008 Ozone Nonattainment Areas meet the 1997 conformity requirements by demonstrating conformity to the 2008 standard.

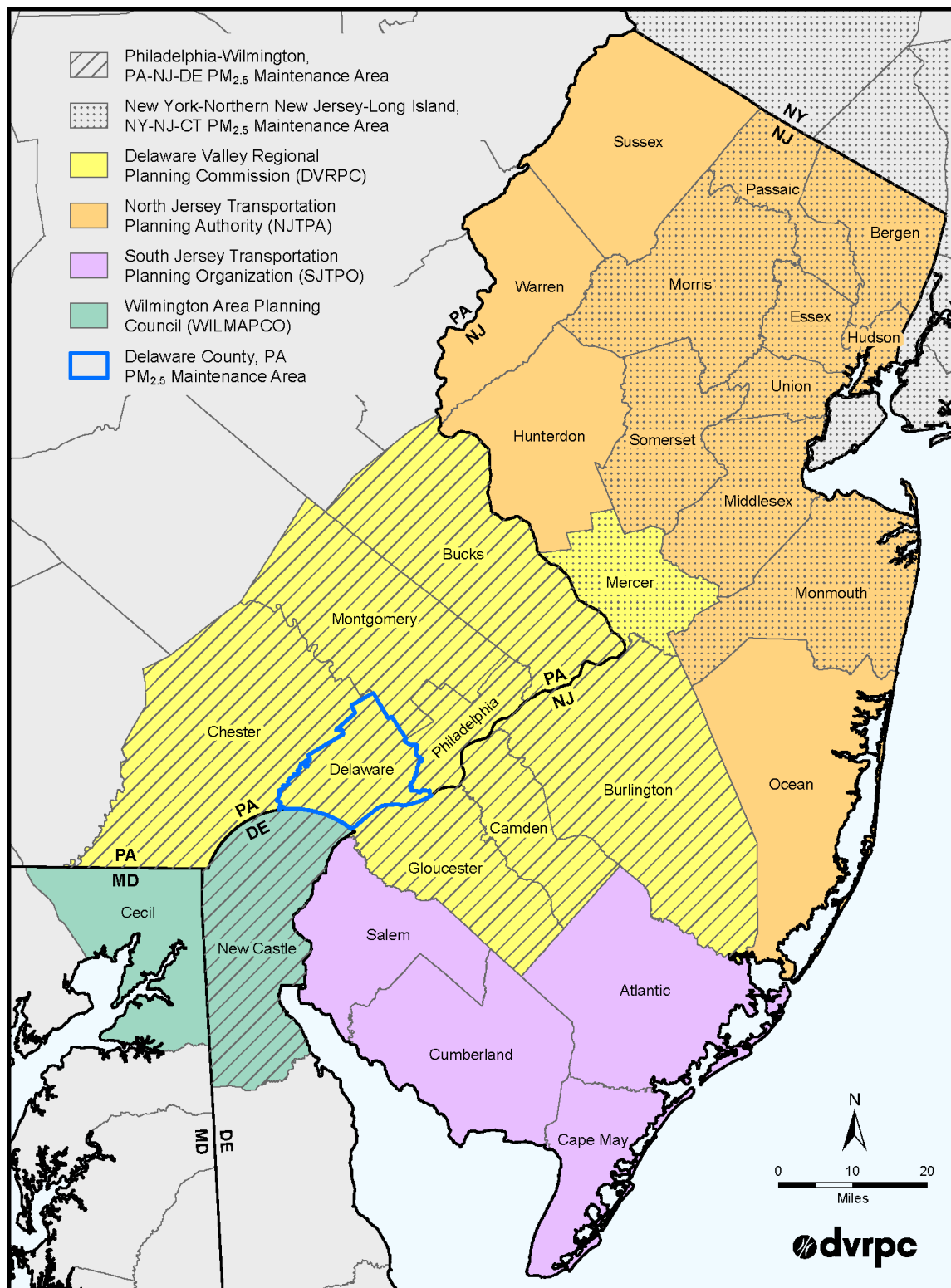
The Philadelphia Ozone Nonattainment Area encompasses the entire DVRPC region, the entire South Jersey Planning Organization (SJTPPO) area, the entire Wilmington Area Planning Council (WILMAPCO) region, and Ocean County, New Jersey. The Philadelphia PM_{2.5} Maintenance Area covers eight counties in the DVRPC region, the entire SJTPPO area, and New Castle County, Delaware (part of the WILMAPCO area). Mercer County, in the DVRPC region, is part of the New York – Northern New Jersey PM_{2.5} Maintenance Area and Delaware County, Pennsylvania is a stand-alone Maintenance Area for the 2012 Annual PM_{2.5} Standard. Figures 7 and 8 detail the current ozone and PM_{2.5} nonattainment and maintenance areas that are relevant to the DVRPC region.

Figure 7: Philadelphia–Wilmington–Atlantic City PA–NJ–MD–DE Eight-Hour Ozone Nonattainment Area



Source: DVRPC, 2025

Figure 8: DVRPC Annual and 24-Hour PM_{2.5} Maintenance Areas



Source: DVRPC, 2025

NAAQS

The CAA, first enacted in 1963 and last amended in 1990, requires that the U.S. EPA set national air quality standards for air pollutants that are considered harmful to public health and the environment. The CAA also requires the agency to periodically review the standards and to update those standards as necessary to provide an ample margin of safety to protect public health and welfare.

The U.S. EPA has set NAAQS for several principal air pollutants, referred to as criteria pollutants. The NAAQS criteria pollutants include ozone, carbon monoxide, coarse and fine particulate matter (PM₁₀ and PM_{2.5}, respectively), sulfur dioxide, nitrogen dioxide, and lead.

The DVRPC region must demonstrate transportation conformity for ozone and PM_{2.5}. Table 2 lists the current NAAQS for ozone and PM_{2.5} and the date of adoption by the U.S. EPA. In May 2024, the U.S. EPA finalized the update to the annual PM_{2.5} standard. Nonattainment designations for this standard are pending and DVRPC will continue to demonstrate conformity to the 2006 and 2012 standards as required.

Table 2: Current NAAQs

NAAQS	Standard	Date Adopted	Final NAA Designations	FR Notice
Ozone (2015)	70 ppb	October 2015	June 2018	80 FR 65292
Annual PM _{2.5} (2012)	12 µg/m ³	December 2012	April 2015	78 FR 3086
Annual PM _{2.5} (2024)	9 µg/m ³	May 2024	Pending	89 FR 16202
24-Hour PM _{2.5} (2006)	35 µg/m ³	October 2006	December 2009	71 FR 61144

Source: U.S. EPA, 2025

Note: NAA = Nonattainment Area; FR = Federal Register.

When a region is designated as a nonattainment area by the U.S. EPA, states are required to develop SIPs that outline how the state plans to meet or “attain” the NAAQS. Implemented SIPs contain an MVEB. Regional emissions estimates are compared against these budgets to determine progress toward meeting air quality goals.

The nonattainment areas for each of the criteria pollutants can be viewed at: www.epa.gov/green-book. Detailed information on the SIPs can be viewed at: www.epa.gov/air-quality-implementation-plans/sip-status-reports.

Public Health Impacts

Ozone is a photochemical oxidant and a major component of smog. Ozone is not emitted directly into the air but is formed through complex chemical reactions between precursor emissions of VOCs and NO_x in the presence of sunlight. Although ozone in the upper atmosphere shields and protects the Earth from harmful radiation from the sun, high concentrations of ozone at ground level are a serious health and environmental concern. Even at low levels, ozone can damage lung tissue, reduce lung function, and sensitize the respiratory system to other irritants. Additionally, scientific evidence has indicated that ambient levels of ozone not only affect people with pulmonary conditions, such as asthma, but also normal, healthy adults and children.

Particulate Matter (PM) includes both solid particles and liquid droplets found in air. Many man-made and natural sources emit PM directly or emit other pollutants that react in the atmosphere to form PM. These solid and liquid particles come in a wide range of sizes. The coarse particles, less than 10 micrometers (µm) in diameter (PM₁₀), pose a health concern since they can be inhaled into and accumulate in the respiratory system. The fine particles, less than 2.5 µm in diameter (PM_{2.5}), are believed to pose even greater health risks. Due to their small size, these fine particles can lodge deep in the lungs. Individuals particularly sensitive to PM_{2.5} exposure include older adults, people with heart and lung disease, and children. Health studies have shown a significant association between exposure to PM_{2.5} and premature mortality.

PM_{2.5} can be emitted directly from combustion engines or chemically formed in the atmosphere when certain gases are present. Direct PM_{2.5} emissions can result from particles in exhaust fumes, from brake and tire wear, from road dust kicked up by vehicles (called fugitive road dust), and from highway and transit construction. Indirect PM_{2.5} emissions can result from one or more of several exhaust components, including VOCs, NO_x, sulfur oxides (SO_x), and ammonia (NH₃).

Transportation Conformity

The CAA section 176(c) (42 US Code [U.S.C.] 7506(c)) requires that federally funded highway and transit project activities “conform to” state air quality goals found in SIPs. This process ensures that transportation and air quality agencies consult with one another to look for strategies to relieve traffic congestion, improve air quality, and provide communities with a safe and efficient transportation system.

The transportation conformity process is required in areas that have been designated by the U.S. EPA as nonattainment or maintenance areas (see Figures 7 and 8 on pages 10 and 11). A transportation conformity demonstration is required at least once every four years; or when an MPO adopts a new LRP or TIP; adds or deletes a regionally significant, nonexempt project in a LRP or TIP, or when an MPO significantly amends the scope or timing of construction of a nonexempt project.

Transportation conformity is demonstrated when federally funded highway and transit activities are determined not to cause new air quality violations, worsen existing violations, or delay timely attainment of the NAAQS. The Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) jointly make conformity determinations within air quality nonattainment and maintenance areas to ensure that federal actions are consistent with corresponding SIPs. The U.S. Department of Transportation cannot fund, authorize, or approve federal actions to support programs or projects that are not found to conform to the CAA requirements governing the current NAAQS for transportation conformity.

This conformity demonstration is based on the current Final Rule under the CAA, including 40 CFR Part 93, as revised. The Final Rule dictates that conformity findings within the DVRPC planning area must be based on the applicable SIP budgets in all target analysis years. The demonstration process estimates emissions that will result from the region's transportation system and determines whether those emissions are within the limits outlined in respective SIPs and other applicable NAAQS requirements.

In multi-state nonattainment and maintenance areas that have SIP MVEBs for each state's portion of the nonattainment or maintenance area, conformity can be demonstrated for each state's subregion of the area. For example, because DVRPC's Pennsylvania counties have SIP MVEBs, DVRPC can demonstrate conformity for the Pennsylvania portion of the Philadelphia Ozone Nonattainment Area separately from the rest of the nonattainment area in New Jersey, Delaware, and Maryland.

CHAPTER 2: Conformity Demonstration Overview

DVRPC LRP and TIP

The *Update: Connections 2050* Long-Range Plan provides a broad planning framework for the region. The transportation component of the LRP includes a comprehensive long-range transportation plan for

There are three categories of projects in the Plan and TIP:

Regionally Significant Project: a nonexempt highway or transit project on a facility that, regardless of its length, serves regional needs and is normally included in the regional travel demand model.

Exempt Project: a project listed in Table 2 or Table 3 of the Final Rule (40 CFR 93) that primarily enhances safety or aesthetics, maintains mass transit, continues current levels of ridesharing, or builds bicycle and pedestrian facilities.

Not Regionally Significant Project/Nonexempt: a nonexempt highway or transit project on a facility that does not serve regional needs or is not normally included in the regional travel simulation model and does not fit into an exempt project category in Table 2 or Table 3 of the Final Rule (40 CFR 93).

the DVRPC region. The *Update: Connections 2050* Long-Range Plan includes over \$78.4 billion from traditional sources for regional transportation improvements. The fiscally constrained LRP prioritizes transportation funding for rebuilding the region's infrastructure but also includes new major regional transportation projects. The LRP also sets a vision and goals for the region's orderly growth and development and identifies a set of strategies to help achieve the vision.

The LRP's financial component reflects current and projected federal authorization levels. Estimated costs for LRP projects have been adjusted to account for inflation and to reflect the year of expenditure, as required by the FHWA/FTA Final Rule on Statewide and Metropolitan Transportation Planning and Programming.²

The New Jersey and Pennsylvania TIPs are staged, multiyear, intermodal programs of transportation projects covering the nine counties in the DVRPC planning area. The DVRPC TIPs are consistent with the LRP and are developed, pursuant to 23 CFR Part 450, to meet the federal requirement of being financially constrained to a funding level that is available to the region as established in the financial guidance provided by the respective states. All LRP and TIP project descriptions have been reviewed and approved by DVRPC's Transportation Conformity Interagency Consultation Group (TCICG) for appropriate Air Quality (AQ) code and analysis years. The Appendix in this document lists all air quality significant projects in the LRP and TIPs, along with their designated AQ code and analysis years.

The CAA requires that, in nonattainment or maintenance areas, all regionally significant and nonexempt projects included in a LRP or TIP on facilities classified as principal arterials or higher—that is, those that can impact regional air quality—meet the conformity requirements established in the Final Rule. DVRPC must identify these projects and, where required, conduct an emissions analysis in order to demonstrate that projects included in the LRP or TIP do

² See 23 CFR 450.216(1), 23CFR 450.322(f) (10) (iv), and 23 CFR 450.23(h).

not worsen air quality or inhibit the region's progress toward meeting the NAAQS.

The project set, analyzed for conformity, includes the existing transportation network, all regionally significant projects funded in the LRP,³ those in the current TIPs, and those that have been introduced in previous TIPs but are not yet completed. Each project is classified by the first year that the project is included in the regional emissions analysis, also known as the analysis year. The emissions estimate for a particular analysis year include all of the projects that are expected to be open to traffic by that year.

DVRPC AQ Code

DVRPC has developed an AQ coding scheme to identify projects that are included in the emissions analysis and the project's analysis year. The coding scheme is also used to identify which projects are exempt from the emissions analysis. All regionally significant, nonexempt projects are assigned a five-character alphanumeric AQ code that begins with a four-digit analysis year followed by the letter "M" to indicate that it was included in the TDM. For instance, a LRP or TIP project may have an AQ code of 2026M, in which case the project is identified as a regionally significant, nonexempt project, the emissions estimates of which are (1) included in the 2026 and all subsequent future analysis years, and (2) performed using the TDM network analysis technique.

DVRPC has also developed an internal coding scheme to identify each exempt project type based on those defined in the Final Rule. Table 3 shows the exempt project categories in the Final Rule and their corresponding DVRPC AQ codes. In cases in which multiple codes can apply to a project, the most representative code is assigned. The AQ code for each project is shown in the respective LRP and TIP documents.

Projects that have been determined to be not regionally significant as defined in the Final Rule, and do not fit into an exempt category, are labeled as "NRS." The TCICG has reviewed all projects and concurred on all assigned AQ codes in the LRP and the TIP.

³ The *Update: Connections 2050* Plan also includes a list of unfunded aspirational projects that are consistent with the Plan's vision, but can be not funded within fiscal constraint. As a result, these projects are not included in the Conformity analysis.

Table 3: AQ Codes for Exempt and Not Regionally Significant Projects in the LRP and TIPs

	Exempt Project Category†	AQ Code		Exempt Project Category†	AQ Code
Safety Projects	Railroad/highway crossing	S1	Air Quality Projects	Continuation of ridesharing and vanpooling promotion activities at current levels	A1
	Hazard elimination program	S2		Bicycle and pedestrian facilities	A2
	Safer non-federal-aid system roads	S3	Other Projects	Specific activities that do not involve or lead directly to construction, such as planning and technical studies	X1
	Shoulder improvements	S4		Grants for training and research programs	X2
	Increasing sight distance	S5		Planning activities conducted pursuant to title 23 and 49 U.S.C.	X3
	Safety improvement program	S6		Federal aid systems revisions	X4
	Traffic control device and operating assistance other than signalization projects	S7		Engineering to assess social, economic, and environmental effects of the proposed action or alternatives to that action	X5
	Railroad/highway crossing warning devices	S8		Noise attenuation	X6
	Guardrails, median barriers, crash cushions	S9		Advance land acquisitions (23 CFR 712 or 23 CFR 771)	X7
	Pavement resurfacing and/or rehabilitation	S10		Acquisition of scenic easements	X8
	Pavement marking demonstration	S11		Plantings, landscaping, etc.	X9
	Emergency relief (23 U.S.C. 125)	S12		Sign removal	X10
	Fencing	S13		Directional and informational signs	X11
	Skid treatments	S14		Transportation enhancement activities (except rehabilitation and operation of historic transportation buildings, structures, or facilities)	X12
	Safety roadside rest areas	S15		Repair of damage caused by natural disasters, civil unrest, or terrorist acts, except projects involving substantial functional, locational, or capacity changes	X13
	Adding medians	S16	No Regional Emissions Analysis Required	Intersection channelization projects	R1
	Truck-climbing lanes outside the urbanized area	S17		Intersection signalization projects at individual intersections	R2
	Lighting improvements	S18		Interchange reconfiguration projects	R3
	Widening narrow pavements or reconstructing bridges (no additional travel lanes)	S19		Changes in vertical and horizontal alignment	R4
	Emergency truck pullovers	S20		Truck size and weight inspection stations	R5
				Bus terminals and transfer points	R6
Mass Transit Projects	Operating assistance to transit agencies	M1	Not Regionally Significant	Projects determined to be “Not Regionally Significant” and do not fit into an exempt category	NRS
	Purchase of support vehicles	M2			
	Rehabilitation of transit vehicles	M3			
	Purchase of office, shop, and operating equipment for existing facilities	M4			
	Purchase of operating equipment for vehicles (e.g., radios, fare boxes, lifts, etc.)	M5			
	Construction or renovation of power, signal, and communications systems	M6			
	Construction of small passenger shelters and information kiosks	M7			
	Reconstruction or renovation of transit buildings and structures	M8			
	Rehabilitation or reconstruction of track structures, track, and tracked-in existing rights-of-way	M9			
	Purchase of new buses and rail cars to replace existing vehicles or for minor expansions of the fleet	M10			
	Construction of new bus or rail storage/maintenance facilities categorically excluded in 23 CFR part 771	M11			

Source: DVRPC, 2025

†40 CFR 93 Sections 126 and 127.

Analysis Year

Required analysis years include SIP budget years, designated NAAQS attainment dates, and the LRP horizon year. All other analysis years must be no more than 10 years apart.

The analysis years for this conformity demonstration are listed in Table 4. The years 2026 (Ozone attainment year), 2030 (PM_{2.5} SIP budget year for Delaware County only), and 2050 (the LRP horizon year) are required analysis years, and 2030 and 2040 are interim years within 10 years of the previous analysis.

Table 4: Mobile Source Analysis Years

Year	Ozone	PM _{2.5}	Note
2026	√	√	Ozone attainment year
2030	√	√	PM _{2.5} SIP budget year (Delaware County only and interim year)
2040	√	√	Year within 10 years of previous analysis
2050	√	√	Horizon year of the LRP

Source: DVRPC, 2025

Table 5 describes the project sets that are considered in each future-year analysis.

Table 5: Projects Included in the Regional Emissions Analysis

Analysis Year	Project Set
2026 (TIP year and PM _{2.5} SIP budget year)	All regionally significant highway and transit facilities, services, and activities currently in place and Additional highway and transit projects that are scheduled to open prior to 2026
2030 (SIP budget year for Delaware County, PA only and interim year)	All regionally significant highway and transit projects in the 2026 model network and Additional highway and transit projects that are scheduled to open from 2026 to 2029
2040 (interim year)	All regionally significant highway and transit projects in the 2030 model network and Additional highway and transit projects that are scheduled to open from 2030 to 2039
2050 (DVRPC LRP horizon year)	All regionally significant highway and transit projects in the 2040 model network and Additional highway and transit projects that are scheduled to open from 2040 to 2049

Source: DVRPC, 2025

Emissions Analysis

Once the regionally significant and nonexempt projects in the LRP and TIP are identified and analysis years are assigned, regional emissions estimates are developed through a series of models that simulate travel demand in the region and then convert those travel characteristics into estimates of emissions of the pollutants of concern.

LRP and TIP projects are coded into the DVRPC TDM (Travel Improvement Model version 2.5.1). The TDM represents the regional transportation network and uses inputs like population, employment, and land use data to develop estimates for trip length, vehicle miles traveled (VMT), and traffic volumes on the

transportation network. The model includes the base transportation network of roads and transit projects that have been constructed, and new networks are built to include projects from the LRP and TIP according to the projects' analysis years.

Outputs of the TDM are then processed and entered into the emissions estimation model, MOVES 5. The MOVES model will then take the TDM outputs, information on meteorology, fuel information, data on vehicle types and vehicle populations, and other critical inputs to develop projected emissions estimates for a given analysis year and pollutant, which is then compared against the SIP MVEB to demonstrate conformity.

Latest Planning Assumptions

The Final Rule requires that the most current available planning assumptions be used in determining transportation conformity. In addition to the LRP and TIP projects that are included in the conformity analysis, planning assumptions are critical inputs to the TDM. These include population and employment estimates, transit and toll road pricing, land use assumptions, VMT, travel time of day patterns, transit ridership, and vehicle fleet mix and age.

Planning assumptions are updated following U.S. EPA and FHWA joint guidance (EPA420-B-08-901) that clarifies the implementation of the latest planning assumption requirements in 40 CFR 93.110. This analysis utilizes the best available latest traffic, vehicle fleet, and environmental data to estimate regional highway emissions.

In New Jersey, the New Jersey Department of Transportation (NJ DOT) updates many of the planning assumptions to meet the transportation conformity requirements. For this conformity determination, NJ DOT has updated vehicle age distribution assumptions using 2023 vehicle registration data provided by the New Jersey Department of Motor Vehicles. VMT were also adjusted to the latest available Highway Performance Monitoring System (HPMS) factors, which are from 2023.

In Pennsylvania, the Pennsylvania Department of Transportation (PennDOT) updates the key planning assumptions on a triennial basis to support the U.S. EPA's National Emissions Inventory and FHWA's latest planning assumption requirements for transportation conformity. The PennDOT triennial data update is used to inform the planning assumptions for the future analysis years used for transportation conformity. PennDOT has updated vehicle age distribution assumptions using 2023 vehicle registration data provided by the Pennsylvania Department of Motor Vehicles. VMT were also adjusted to the latest HPMS factors, which are from 2023.

All other data assumptions for the conformity analysis relied on the latest available planning assumptions or national/local defaults consistent with methods used for past conformity analyses and the U.S. EPA's technical guidance. This includes information and characteristics related to fuels, inspection and maintenance program parameters, heavy-truck long duration idling, and environmental data (e.g., temperatures and humidity).

Planning assumptions, as well as the list of LRP and TIP projects, are reviewed and approved by the TCICG before DVRPC begins the regional emissions analysis.

The planning assumptions and project lists used in this demonstration are the latest and most current assumptions available as of June 10, 2025, which serves as the "start of analysis" date for the conformity determination.

Population and Employment Estimates

The population and employment estimates used in this conformity determination are the latest available at the traffic analysis zone (TAZ) level. DVRPC's 2050 version 2.1 population and employment forecasts were adopted by the DVRPC Board on May 22, 2025. These estimates include forecasts for the LRP horizon year of 2050 and are posted on the DVRPC website under the Quick Links at <https://www.dvrpc.org/plan/>. This data can also be reviewed upon request.

Transit and Toll Road Policies

Current transit operations and road toll structure are considered as part of the latest planning assumptions. The transit person trips produced by the modal split component of the DVRPC TDM are considered “linked” in the sense that they do not include any transfers that may have occurred either during transit trips or between auto approaches and transit lines. The transit assignment model simultaneously assigns trip origin and destination to routes in the network. While not capacity constrained, this transit assignment procedure accomplishes two major tasks. First, the transit trips are “unlinked” to include transfers; and second, these “unlinked” transit trips are associated with specific transit facilities to produce link, line, and station volumes.

All fares entering the transit network are “blended” by operating entity. For each operator, different existing fare types (e.g., cash; transfer charge; and daily, weekly, and monthly passes) are blended into a single fare policy based on the percentage of each fare type and use in the 2019 fare structure. Then the future fare for each operator is held constant in current dollars. All current operating plans, ridership, and service levels are built into the transit network and incorporated into the future-year networks. Future-year transit networks are augmented with any new services identified in the corresponding DVRPC LRP and TIPs. Table 6 details all transit operators included in the transit network and their operational assumptions.

Other transportation-related costs, such as automobile operating costs, gasoline costs, parking costs, and road/bridge tolls, are also based on current and available data and are held constant in current dollars into the future analysis years.

Transit and toll policies used in this conformity determination are current as of the start of analysis date (June 10, 2025) and do not reflect potential transit service levels impacted by the FY2026 Pennsylvania State Budget.

Table 6: Transit Operation Assumptions

Transit Companies	Fares	Operating Plan /Service Level
SEPTA City Transit Division	Specified in the transit network by operator and by analysis year; held constant in year 2019 dollars	Specified in the transit network by operator and by analysis year
SEPTA Suburban Victory Division		
SEPTA Suburban Frontier Division		
SEPTA Regional Rail Division		
NJ Transit Mercer Division		
NJ Transit Southern Division		
NJ Transit Railroad Division		
PATCO High-Speed Line (DRPA)		
Pottstown Area Rapid Transit		
Krapf's Coaches		

Source: DVRPC, 2025

Note: SEPTA = Southeastern Pennsylvania Transportation Authority; NJ Transit = New Jersey Transit; DRPA = Delaware River Port Authority; PATCO = Port Authority Transit Corporation.

Travel Demand Simulation

DVRPC's TDM is a four-step process that ultimately assigns travel patterns among and within TAZs using the built transportation networks, along with the planned highway and transit networks described by the LRP and the TIPs. DVRPC's TDM was validated in 2019 following FHWA guidance and features an expanded geography to improve travel simulation within, through, and across the region. Additional adjustments were made to the model to reflect current conditions using recent HPMS data from NJDOT and PennDOT.

The current model includes a detailed transportation network for the nine-county DVRPC region, and a less detailed network for the 16 counties surrounding the DVRPC region (the "Extended Area"). The current model also includes updated socio-demographic input data (households, population, and employment). The DVRPC TDM meets the federal transportation authorization and planning requirements, as well as requirements included in the CAA and the Final Rule. Travel model output is then run through a postprocessor in preparation for emissions analysis by MOVES 5. The TCICG has reviewed and approved DVRPC's travel demand modeling process.

Emissions Model

The CAA requires the U.S. EPA to regularly update emissions models. In 2009, the U.S. EPA required that the MOVES model become the official emissions estimation model used for SIP development and transportation conformity determinations. The MOVES family of models estimates on-road mobile emissions based on an operational mode that accounts for different driving patterns and emissions profiles from various vehicle types. Beginning in December 2026, MPOs and state DOTs are required to use the MOVES 5 emissions model to demonstrate transportation conformity. DVRPC used the MOVES 5 model for this determination. For a detailed description of the MOVES model, please visit: www.epa.gov/moves.

Conformity Tests

The DVRPC region must demonstrate transportation conformity for ozone and PM_{2.5}. Governing SIPs are in place for these pollutants in New Jersey and Pennsylvania. DVRPC used the applicable SIP budgets to demonstrate transportation conformity for ozone and PM_{2.5} (in Pennsylvania). The U.S. EPA has approved limited maintenance plans for the PM_{2.5} Maintenance Areas in the New Jersey portions of the DVRPC region and DVRPC is no longer required to perform emissions analysis to demonstrate conformity to the PM_{2.5} standards in Burlington, Camden, Gloucester, or Mercer Counties in New Jersey (89 FR 45658).

The DVRPC region was designated as a marginal nonattainment area for the 2015 Ozone Standard on June 4, 2018. Implementation guidance for this standard was released by the U.S. EPA in December 2018, and this conformity determination was conducted following the 2015 Eight-Hour Ozone NAAQS implementation guidance (83 FR 62988). The Philadelphia Ozone Nonattainment Area (NAA) did not meet the August 2021 designated attainment date for ozone and in November 2022, the U.S. EPA finalized the rule to re-designate the NAA to moderate nonattainment for the 2015 Ozone Standard.

The Philadelphia Ozone NAA subsequently did not meet the August 2024 attainment date for moderate nonattainment and the U.S. EPA has re-designated the area to serious nonattainment. The attainment date for areas designated as serious nonattainment for the 2015 Ozone Standard is August 2027 (89 FR 61025).

This demonstration shows conformity to the 2009 Ozone SIP budget in New Jersey and the 2008 Ozone SIP budget in Pennsylvania. These budgets were approved by the U.S. EPA for conformity purposes in May 2009 (73 FR 41068) and February 2011 (76 FR 6559), respectively. All ozone budgets have been established by the state DEPs using MOBILE 6.2. The regional emissions analysis for ozone was conducted using MOVES 5. Analysis is conducted for ozone emissions for a typical summer work weekday.

The U.S. EPA has approved maintenance plans for the 2006 24-Hour PM_{2.5} standards in Pennsylvania counties in the DVRPC region in April 2015 (80 FR 22112) and the 2012 Annual PM_{2.5} standard in Delaware County in November 2019 (84 FR 51420). Both SIPs contain MVEBs for direct PM_{2.5} and precursor NO_x to be used to demonstrate transportation conformity. All PM_{2.5} MVEBs are expressed in tons of emissions per year for both the annual and 24-hour standards.

The U.S. EPA has ruled that exhaust and brake/tire wear must be included in the regional analysis of direct PM_{2.5} emissions but has also ruled that fugitive road dust does not need to be included in this analysis in the DVRPC region. Thus, the only components of direct PM_{2.5} emissions in this DVRPC conformity iteration are tailpipe exhaust and brake/tire wear.

For the indirect PM_{2.5} emissions (also called PM_{2.5} precursors), the U.S. EPA has identified four potential transportation-related PM_{2.5} precursors: VOCs, NO_x, SO_x, and NH₃. The State DEPs have determined that NO_x is contributing to regional PM_{2.5} formation and therefore must be included in the PM_{2.5} precursor analysis.

Tables 7–9 show the governing MVEBs to be utilized in this iteration of conformity demonstration.

Table 7: Ozone Emissions Budgets (Tons/Day)

Pollutant	Budget†	Pennsylvania Subregion (tons/day)	New Jersey Subregion (tons/day)
VOCs	2008 Budget	61.09 (all counties)	
	2009 Budget		25.98 (all counties)
NOx	2008 Budget	108.78 (all counties)	
	2009 Budget		63.66 (all counties)

Source: DVRPC, 2025

†Ozone budgets are reported to the second decimal in accordance with the SIP. SIP budgets for ozone are for a typical July day.

Table 8: Pennsylvania PM_{2.5} Emissions Budgets (Tons/Year)

Pollutant	Budget†	Pennsylvania Subregion (tons/year)
24-Hour Direct PM _{2.5} ◆	2025 Budget (tons per year)	1,316
24-Hour Precursor NO _x ◆		25,361

Source: DVRPC, 2025

†PM_{2.5} budgets are rounded off to the nearest integer in accordance with the SIP.

◆SIP budgets for Annual and 24-Hour PM_{2.5} are the same value expressed in tons/year.

Table 9: Delaware County PM_{2.5} Emissions Budgets (Tons/Year)

Pollutant	Budget†	Delaware County (tons/year)
Annual Direct PM _{2.5} ◆.	2022 Budget (tons per year)	79
Annual Precursor NO _x ◆		2,016
Annual Direct PM _{2.5} ◆.	2030 Budget (tons per year)	53
Annual Precursor NO _x ◆.		956

Source: DVRPC, 2025

†PM_{2.5} budgets are rounded off to the nearest integer in accordance with the SIP.

◆SIP budgets for Annual and 24-Hour PM_{2.5} are the same value expressed in tons/year.

CHAPTER 3: Regional Emissions Analysis

Travel Demand Simulation Results

Quantitative analyses for this iteration of transportation conformity determination for the DVRPC region began on June 10, 2025. All planning assumptions utilized in this demonstration are the latest and most current as of that date. The TDM analysis includes all regionally significant and nonexempt projects from the *Update: Connections 2050* Long-Range Plan, FFY 2026 TIP for New Jersey, and FFY 2025 TIP for Pennsylvania segregated into networks according to the anticipated date that the facilities will be open to traffic.

Results from the TDM, including speed distribution, VMT by vehicle type, road-type distribution, ramp fraction, VMT by day and month, and VMT by hour, were input into the MOVES 5 emissions analysis model. These input files are provided to the U.S. EPA for review and are available upon request.

For ozone analysis, a second speed distribution is performed before being analyzed by the MOVES 5 model. The postprocessor applies a factor to the assigned volumes from the TDM that increases the annual average weekday volume to an average July weekday volume (these factors vary by county and functional class). This speed distribution is then organized into a MOVES-formatted input file, and the daily speed distribution is used for ozone emissions analysis to determine VOC and NO_x emissions estimates for a typical summer work weekday.

Emissions Estimate Results

Mobile source emissions estimates are outputs of the MOVES 5 model. The regional emissions analysis must meet all conformity tests in the Final Rule. Specifically, emissions of VOCs, NO_x, and PM_{2.5} must be less than the approved MVEBs.

Tables 10 and 11 present the results of these calculations for the transportation conformity simulation for the critical ozone precursors. The Final Rule requires that until MVEBs are established for the 2008 or 2015 Eight-Hour Ozone NAAQS, the approved SIP MVEB for the 1997 Ozone Standard are to be used to demonstrate conformity.

Table 10: VOCs Emissions Analysis Results (Tons/Day)

		2008 SIP MVEB†	2009 SIP MVEB†	2026 Emissions	2030 Emissions	2040 Emissions	2050 Emissions
New Jersey	Emissions from MOVES 5	–	25.98	9.93	8.77	6.30	4.59
Pennsylvania	Emissions from MOVES 5	61.09	–	17.71	13.49	9.14	8.08

Source: DVRPC, 2025

†The most recent Eight-Hour Ozone SIP MVEBs will apply to all future analysis years. All emissions are rounded off to the nearest hundredths of a ton per day.

Table 11: NO_x Emissions Analysis Results (Tons/Day)

		2008 SIP MVEB†	2009 SIP MVEB†	2026 Emissions	2030 Emissions	2040 Emissions	2050 Emissions
New Jersey	Emissions from MOVES 5	–	63.66	12.80	8.69	3.91	2.84
Pennsylvania	Emissions from MOVES 5	108.78	–	14.79	9.61	5.08	4.37

Source: DVRPC, 2025

†The most recent Eight-Hour Ozone SIP MVEBs will apply to all future analysis years. All emissions are rounded off to the nearest hundredths of a ton per day.

*Pending

Table 12 provides the emissions estimate results for the 2006 PM_{2.5} Maintenance Area in Pennsylvania, and Table 13 provides the emissions estimates and MVEB for the Delaware County 2012 Annual PM_{2.5} Maintenance Area.

Since the PM_{2.5} SIPs provide MVEBs expressed in annual values (tons/year), conformity is demonstrated by comparing emissions estimates against these budgets in those terms. Each future-year emissions estimate needs to be less than its associated SIP MVEB budget.

Table 12: 2006 24-Hour Direct PM_{2.5} and NO_x Emissions Analysis Results (Tons/Year) for Pennsylvania

		2025 SIP MVEB†	2026 Emissions	2030 Emissions	2040 Emissions	2050 Emissions
Direct PM _{2.5}	DVRPC—PA	1,316	340	228	199	194
PM _{2.5} Precursor (NO _x)	DVRPC—PA	25,361	7,160	2,826	2,315	2,284

Source: DVRPC, 2025

†The most recent MVEBs apply to all future analysis years. All emissions are rounded to the nearest integer.

Table 13: 2012 Annual Direct PM_{2.5} and NO_x Emissions Analysis Results (Tons/Year) for Delaware County, Pennsylvania

		2022 SIP MVEB†	2026 Emissions	2030 SIP MVEB†	2030 Emissions	2040 Emissions	2050 Emissions
Direct PM _{2.5}	Delaware County	79	37	53	32	24	21
PM _{2.5} Precursor (NO _x)	Delaware County	2,016	643	956	427	237	211

Source: DVRPC, 2025

† Associated 2022 and 2030 MVEBs apply to all future analysis years. All emissions are rounded to the nearest integer.

Meeting the Conformity Criteria

Collectively, these tables show that the estimated emissions of VOCs, NO_x, and PM_{2.5} do not exceed the respective MVEBs included in approved SIPs discussed in the previous sections of this conformity demonstration. Tables 10 through 13 cumulatively demonstrate that the LRP and the TIPs conform to the SIPs with respect to the MVEBs in the corresponding analysis year.

Table 14 indicates DVRPC's responses to the evaluation criteria for the LRP and TIPs, as well as the conformity evaluation criteria from 40 CFR Part 93.

Table 14: Evaluation of the LRP, TIPs, and Conformity Determination Criteria

Corresponding 40 CFR Part 93 Section(s)	Evaluation Criteria	DVRPC Response
§93.106(a)(1)	Are the transportation plan horizon years correct?	Yes. The analysis years of 2026, 2030, 2040, and 2050 correspond to the attainment, SIP budget, interim years within a 10-year timeframe, and the DVRPC LRP horizon year.
§93.106(a)(2)(i)	Does the Plan quantify and document the demographic and employment factors influencing transportation demand?	Yes. The <i>Update: Connections 2050</i> Long-Range Plan does quantify and document demographic and employment factors influencing transportation demand. Future population and employment forecasts were developed with member counties and adopted by the DVRPC Board.
§93.106(a)(2)(ii)	Is the highway and transit system adequately described in terms of regionally significant additions or modifications to the existing transportation network that the transportation Plan envisions to be operational in horizon years?	Yes. The regionally significant additions and modifications to the network utilized in this conformity analysis are listed and described. Detailed information regarding each project can be found in the respective LRP and TIP documents.
§93.108	Are the transportation LRP and TIPs fiscally constrained?	Yes. The LRP and the TIP are constrained to reasonably anticipated financial resources, as required by federal regulations, and are based on year-of-expenditure costs.
§93.109(c)	Are the regional conformity test requirements met for all nonattainment and maintenance areas?	Yes. PM _{2.5} , VOCs, and NO _x MVEBs have been approved by the U.S. EPA. DVRPC performs budget tests to demonstrate the PM _{2.5} and ozone conformity of the LRP and the TIPs. A limited maintenance plan is approved for PM _{2.5} in New Jersey and no regional emissions analysis are required.

<continued>

Corresponding 40 CFR Part 93 Section(s)	Evaluation Criteria	DVRPC's Response
§93.110	Is the conformity determination, with respect to all other applicable criteria in §93.111-93.119, based upon the most recent planning assumptions in force at the time that the conformity determination began?	Yes. This conformity determination utilizes the most recent planning assumptions as of June 10, 2025, the start of analysis dates for this conformity determination for the LRP and TIPs.
	Are the assumptions derived from the estimates of current and future population, employment, travel, and congestion the most recently developed by the MPO or other designated agency? Is the conformity determination based upon the latest assumptions about current and future background concentrations?	Yes. This conformity determination utilizes the most recent demographic and employment data, which were adopted by the DVRPC Board in October 2024 and May 2025, respectively. Also, other planning assumptions and travel data are derived from the most current information available to DVRPC.
	Are any changes in the transit operating policies (including fares and service levels) and assumed transit ridership discussed in the determination?	Yes. Applicable transit operating policies and transit ridership are discussed in this document and were verified through the consultation process. (See Chapter 2, pp. 20–21).
	Does the conformity determination include reasonable assumptions about transit service and increases in transit fares and road and bridge tolls over time?	Key transit and toll assumptions outlined in this document were verified through the consultation process. (See Chapter 2, pp. 20–21).
	Does the conformity determination use the latest existing information regarding the effectiveness of the TCMs and other implementation plan measures that have already been implemented?	Currently, there are no adopted TCMs in the corresponding SIPs.
	Are key assumptions specified and included in the draft documents and supporting materials used for interagency and public consultation, as required by §93.105?	Key assumptions are specified, and other supporting documents are included in this conformity determination document, which is available to the TCICG and the public.

<continued>

Corresponding 40 CFR Part 93 Section(s)	Evaluation Criteria	DVRPC's Response
§93.111	Is the conformity determination based upon the latest emissions model?	Yes. The transportation conformity determination for the LRP and the TIPs are based on MOVES 5 analysis.
§93.112	Did the MPO make the conformity determination according to the consultation procedures of the Final Rule or the state's conformity SIP?	Yes. Formal interagency consultation meetings with the U.S. EPA, FHWA, FTA, and state environmental and transportation agencies were held according to the consultation procedures consistent with the requirements of all applicable regulations, including §93.105(a) and (e), to consider input assumptions and to review findings regarding transportation conformity. In compliance with 23 CFR 450, a 30-day public comment period and public meetings were held to receive comments regarding the transportation conformity of the LRP and the TIPs under all governing NAAQS.
§93.113(b) §93.113(c)	Are TCMs being implemented in a timely manner?	There are currently no adopted TCMs in the SIPs.
§93.118	For areas with SIP Budgets: is the LRP, TIP, or project consistent with the established MVEB(s) in the applicable SIP?	Yes. Projects contained in the LRP and the TIPs result in fewer emissions than the established budgets for all applicable pollutants in each analysis year.
§93.122(a)(1)	Does the conformity analysis include all regionally significant projects?	Yes. The project sets for the LRP and the TIPs include all regionally significant projects.
§93.122(a)(6) §93.122(a)(7)	Are reasonable methods and factors used for the regional emissions analysis consistent with those used to establish the emissions budget in the applicable SIP?	Yes. The ambient temperatures and other factors used in the analysis, including the methods for off-network VMT and speed, have been reviewed by the TCICG and deemed reasonable.
§93.122(b)	Is there a network-based travel model of reasonable methods to estimate traffic speed and delays for the purpose of transportation-related emissions estimates?	Yes. DVRPC uses a network-based model that runs iteratively to obtain convergence on input/output highway and transit travel speed. It is sensitive to travel time, costs, and other factors affecting travel choices.

Source: DVRPC, 2025

CHAPTER 4: Stakeholder Participation

Interagency Consultation Group Meetings

DVRPC participated in a series of TCICG meetings and correspondence for this iteration of the transportation conformity demonstration of the LRP and the TIPs.

For New Jersey, a TCICG meeting was held via video conference on June 5, 2025. Prior to the meeting DVRPC provided the TCICG with the proposed conformity schedule, the lists of planning assumptions and MOVES model inputs for the emissions analysis, and the lists of projects from the Draft LRP and Draft FFY 2026 TIP for New Jersey that would be analyzed for this conformity determination. The TCICG reviewed the planning and model inputs and project lists and approved DVRPC to start the conformity analysis on June 10, 2025.

In Pennsylvania, consultation with the TCICG was conducted through email. Planning assumptions, model inputs, and project lists from the Draft LRP and Pennsylvania TIP were discussed and approved by the TCICG. FHWA submitted comments regarding project coding to DVRPC, and all comments were resolved and submitted to the TCICG by June 6, 2025. June 10, 2025 was the official start of analysis date.

Final decisions on items of discussion were summarized and shared with the TCICG in each state.

Represented federal, state, and local partners on the TCICG included U.S. EPA Region II and III offices, FHWA NJ Division Office, FHWA PA Division Office, FTA Region II, New Jersey Department of Transportation, NJ Transit, NJ DEP, Pennsylvania DEP, PennDOT, and SEPTA. The consultant firm of Michael Baker Jr., Inc., also participated in the TCICG process because of its extensive involvement and expertise in the transportation conformity processes in both Pennsylvania and New Jersey.

Public Participation

DVRPC opened a mandated 30-day public comment period beginning on August 4, 2025, to receive comments on the draft conformity findings. The announcement for the public comment period for the conformity determination of the LRP and the TIPs appeared in five major newspapers throughout the region during the week of July 28, 2025. Announcement of the public comment period was included in DVRPC's July and August newsletters, which go to nearly 13,000 subscribers. This draft conformity document was made available online at www.dvrpc.org/AirQuality/Conformity/.

Hard copies of the Executive Summary of the draft document were made available at 42 libraries throughout the region and at DVRPC's offices.

As part of the comment period, an in-person public information session was held on August 5, 2025, at 6:00 PM at the Gloucester County Public Library, and a hybrid in-person/online meeting was held on August 7, 2025, at 6:00 PM at DVRPC's office and via webinar and a call-in function. The meeting presentations are recorded and posted on the DVRPC website for additional access to the public. The comment period closed on September 5, 2025, at 5:00 PM.

Written public comments and questions were accepted in one of the following ways:

- online at www.dvrpc.org/AirQuality/Conformity/,
- by email at airconformity@dvrpc.org; and
- by mail at the address at the end of this document, Attention: TIP/Plan/Conformity Comments.

Comments and responses were presented to stakeholders and the DVRPC Board prior to adopting the updated LRP, the final recommended program of priority transportation projects for the region's TIPs, and this conformity analysis. DVRPC staff presented these comments at the regularly scheduled Board meeting on Thursday, September 25, 2025.

Public Comments

DVRPC received one public comment on the Draft Conformity finding. The email comment content and DVRPC's response are reproduced below.

Comment from lt35phila@hotmail.com:

"Obviously this plan was written by some urban planner with too many degrees and who does not live in the real world.

Air quality.

Transportation conformity is the process by which metropolitan planning organizations (MPOs) or departments of transportation (DOTs) demonstrate that transportation projects included in a region's Long Range Plan (LRP) or Transportation Improvement Program (TIP) do not cause new air quality violations, worsen existing violations, or delay timely attainment of the National Ambient Air Quality Standards (NAAQS).

Few will be taking buses, or trains in 2050. As seen with current SEPTA low ridership, why is this not taken into account?

In less than 10 years, people will be using electric robotaxis.

If you want to keep the air clean and reduce ozone now, widen lanes where traffic sits day in and day out with cars and trucks idling. Think I 476, I 76. 2 lanes to 3 lanes in both directions. Get people in and out of the city and airport as fast and easy as possible.

Have the 1950 designed highway systems been evaluated as part of this study?

Go visit other large cities and see how they handle the sitting traffic problems.

Other transportation-related costs, such as automobile operating costs, gasoline costs, parking costs, and road/bridge tolls, are also based on current and available data and are held constant in current dollars into the future analysis years.

These costs increase daily. Why are they held constant?"

DVRPC Response:

The transportation conformity process is required by the Clean Air Act to account for levels of transit service and ridership when calculating transportation demand and emissions from the transportation network. Current and projected transit ridership, including SEPTA, New Jersey Transit, DRPA PATCO, Pottstown Area Rapid Transit, and Krapf Coach services are taken into account when performing this analysis for the DVRPC region.

While increasing highway capacity may lessen congestion in the short term, capacity adding projects have been demonstrated, in studies of cities from around the world, to worsen air quality as the new highway capacity is consumed by additional vehicles. The Clean Air Act requires that the current and planned highway network be evaluated for transportation demand and emissions when demonstrating transportation conformity.

*According to the U.S. Census Bureau “**Current dollars** is a term describing income in the year in which a person, household, or family receives it.” Holding costs constant in current dollars accounts for inflation and rising costs and considers the impacts of inflation on the costs of transportation to the consumer.*

CHAPTER 5: Conclusion

The DVRPC LRP, FFY 2026 TIP for New Jersey, and FFY 2025 TIP for Pennsylvania are found to be in conformity with the current state SIPs under the CAA. The forecasted emissions levels of VOCs, NO_x, and PM_{2.5} do not exceed the respective budgets established by the states in accordance with the Final Rule under the current NAAQS governing applicable pollutants. DVRPC is no longer required to perform emissions analysis in New Jersey for PM_{2.5} in order to demonstrate conformity to this standard. DVRPC confirms that the transportation conformity analysis meets all applicable conformity criteria, including, but not limited to, the following:

- that the LRP and the TIPs are fiscally constrained [40 CFR 93.108];
- that this determination is based on the latest planning assumptions [40 CFR 93.110];
- that this determination is based on the latest emissions estimation model available [40 CFR 93.111];
- that DVRPC has made the determination according to the applicable consultation procedures [40 CFR 93.112];
- that the LRP and the TIPs do not interfere with the timely implementation of TCMs [40 CFR 93.113]; and
- that the LRP and the TIPs are consistent with the MVEBs in the applicable SIPs [40 CFR 93.118].

These findings demonstrate transportation conformity of the DVRPC *Update: Connections 2050* Long-Range Plan, FFY 2026 TIP for New Jersey, and FFY 2025 TIP for Pennsylvania with the corresponding state SIPs and the Final Rule requirements under the CAA, including:

- the 1997, 2008, and 2015 Eight-Hour Ozone NAAQS in the Philadelphia–Wilmington–Atlantic City, PA–NJ–MD–DE Ozone Nonattainment Area;
- the 2006 24-Hour PM_{2.5} NAAQS in the Philadelphia–Wilmington, PA–NJ–DE PM_{2.5} Maintenance Area;
- the 2006 24-Hour PM_{2.5} NAAQS in the New York–Northern New Jersey–Long Island, NY–NJ–CT Annual and 24-Hour PM_{2.5} Maintenance Area, and
- the 2012 Annual PM_{2.5} Delaware County, PA Maintenance Area.



Appendix

Appendix: Regionally Significant and Nonexempt Projects in the *Update: Connections 2050* Long-Range Plan, FFY 2026 TIP for New Jersey, and FFY 2025 TIP for Pennsylvania

The projects listed in this Appendix were included in the regional conformity analysis. Full descriptions of LRP and TIP projects are available in the relevant documents by referencing the Major Regional Project (MRP) ID and MPMS numbers.

Air Quality Significant New Jersey Draft *Update: Connections 2050* Long-Range Plan MRPs

MRP ID	Project Title	AQ Analysis Code
Highway - Externally Funded		
NJX001	NJ Turnpike Interchanges One to Four Capacity Enhancements Program	2050M
NJX003	AC Expressway Third Lane Widening	2050M
Highway - Regional		
NJR002	I-295 at NJ 38 Missing Moves	2040M
NJR003	I-295 Direct Connect through I-76/NJ 42	2040M
NJR004	US 1 Alexander Rd. to Mapleton Road	2040M
NJR007	NJ 73 from Dutch Road to NJ 70	2040M
NJR008	NJ 73 and Church Road	2040M
NJR009	US 322 Bypass near Rowan University	2050M
NJR019	I-295, Sloan Avenue to Princeton Pike	2040M

Source: DVRPC, 2025

Note: AQ Codes for Long-Range Plan projects indicate when the project is expected to be complete. Phases of these projects are often programmed in the TIP as breakout projects. These phases are analyzed for conformity when the breakout project is expected to open to traffic.

Air Quality Significant Pennsylvania *Update: Connections 2050* Long-Range Plan MRPs

MRP ID	Project Title	AQ Analysis Code
Highway - Externally Funded		
PAX002	I-95 and I-276 (PA Turnpike) Interchange (Stage 2)	2040M
PAX003	I-95 and I-276 (PA Turnpike) Interchange (Stage 3)	2050M
PAX004	I-276 (PA Turnpike) widening through Interchange 351 (Section A)	2050M
PAX005	I-276 (PA Turnpike) widening from Galloway Road to Bensalem Boulevard (Section C)	2050M
PAX009	PA Turnpike (I-76) Reconstruction and Widening - MP 320-324	2040M
PAX010	PA Turnpike (I-76) Reconstruction and Widening MP 298-302	2050M
PAX011	PA Turnpike (I-76) Reconstruction and Widening MP 302-308	2050M
PAX012	PA Turnpike (I-76) Reconstruction and Widening MP 308-312	2050M
PAX013	PA Turnpike (I-76) Reconstruction and Widening - MP 312-316	2040M
PAX014	PA Turnpike (I-76) Reconstruction and Widening - MP 316-319	2040M
PAX020	I-276 / Lafayette Street Interchange	2040M
PAX022	I-276 (PA Turnpike) Fort Washington Interchange	2040M
Highway - Regional		
PAR003	US 1 at PA 352 and 452	2050M
PAR004	US 1 at PA Turnpike	2040M
PAR006	US 30 / Coatesville-Downingtown Bypass (Western)	2050M
PAR007	US 322 from Clayton Park Drive to I-95	2040M
PAR008	Henderson Road and South Gulph Road	2040M
PAR009	PA 309 Connector Road	2040M
PAR010	Ridge Pike Reconstruction	2040M

MRP ID	Project Title	AQ Analysis Code
PAR011	I-95 Philadelphia North (Sector A)	2040M
PAR016	I-95 / US 322 / Highland Avenue Interchange	2040M
PAR019	Bristol Road Extension	2040M
PAR020	Belmont Avenue at I-76 Interchange	2050M
PAR021	US 202 at US 1 Loop Road and PA 926	2030M
PAR024	I-476 Active Traffic Management	2040M
PAR025	I-76 Integrated Corridor Management	2050M
PAR027	US 30 / Coatesville-Downingtown Bypass (Eastern)	2050M
PAR028	I-95 Delaware County Active Traffic Management	2050M
PAR035	I-95 at PA 132 (Street Road)	2050M
PAR036	PA 663 / John Fries Highway	2040M
PAR041	Keystone Boulevard Extension	2050M
PAR060	PA 100 Northbound at Exton Station	2050M
PAR063	PA 663 from Portzer to Hickory	2040M
PAR075	US 1 (Roosevelt Boulevard) Operational Improvements – Phase 1	2030M
PAR084	Traffic Signal Upgrades & Modernization	2040M
Transit		
PAT020	Eastwick Intermodal Station Phase 2	2050M
PAT023	Bus Revolution: Bus Stop and Transit Priority Enhancements	2050M
PAT028	Trolley Modernization: Expansion	2050M

Source: DVRPC, 2025

Note: AQ Codes for Long-Range Plan projects indicate when the project is expected to be complete. Phases of these projects are often programmed in the TIP as breakout projects. These phases are analyzed for conformity when the breakout project is expected to open to traffic.

Air Quality Significant Projects in the FFY 2026 TIP for New Jersey

DB Number	Project Title	AQ Analysis Code
Highway		
Burlington County		
D2502	Automated Traffic Management System Expansion and Upgrade Project	2030M
12307	NJ 38, South Church Street (CR 607) to Fellowship Road (CR 673), Operational and Safety Improvements	2040M
12380	NJ 73, Church Road (CR 616) and Fellowship Road (CR 673) Intersections	2040M
13319	NJ 73, Dutch Road to NJ 70	2040M
21311	I-295 and NJ 38 Interchange Operational Improvements	2040M
Camden County		
25380	Widening of the Atlantic City Expressway (ACE) and NJ 42	2030M
16319	US 30, Gibbsboro Road (CR 686)	2040M
19607B	NJ 38, NJ 70 to Route 73, ATS C#1	2030M
355D	I-295/NJ 42/I-76, Direct Connection, Contract 3	2040M
355E	I-295/NJ 42/I-76, Direct Connection, Contract 4	2040M
Mercer County		
D2023	Circulation Improvements Around Trenton Transit Center	2040M
17419	US 1, Alexander Road to Mapleton Road	2040M
18353	I-295, Sloan Avenue (CR 649) to CR 583 (Princeton Pike)	2040M

Source: DVRPC, 2025

Air Quality Significant Projects in the FFY 2025 TIP for Pennsylvania

MPMS Number	Project Title	AQ Analysis Code
Highway		
Bucks County		
12923	Bristol Road Extension	2040M
13549	US 1 (Bridges) Design (Section 03S)	2040M
93445	US 1 Improvements - North (Section RC2)	2030M
93446	US 1 Improvements Frontage Corridor (Section RC3)* Note: Emissions analysis was included in project modelling for MRP ID PAR004	2040M
99431	Route 663 (John Fries Highway) Widening	2040M
110309	I-95/US 13/PA 132 Slip Ramp Operation Improvement	2040M
110310	Almshouse Road at Jacksonville Road Intersection Improvement	2040M
115418	Route 113 & Minsi Trail Road Roundabout	2030M
115419	US 202/Route 263 (York Road) Roundabout	2030M
118020	Bustleton Pike/Second Street Pike Roundabout	2030M
118022	US 202/PA 179 Roundabout	2040M
119730	I-95, I-295, PA Turnpike Interchange Stage 2	2040M
Chester County		
14532	US 30, Coatesville Downingtown Bypass Reconstruction Design	2040M
87781	US 30, Coatesville Downingtown Bypass (CER-Eastern Section)	2050M
102708	PA 41 at PA 841 Improvements	2040M
107553	US30 and Airport Road Interchange Improvement	2050M
118025	PA 100 Northbound at Exton Station	2040M
118552	Harvey's Bridge Road over West Bridge Brandywine Creek	2040M
120278	Marshallton-Thorndale and Poorhouse Road Roundabout	2030M
Delaware County		
15477	I-95/322/Conchester Highway. Interchange/ Improvements.	2040M
69817	US 322, Featherbed Lane to Chelsea Parkway (Section 102)	2040M
79329	Bridgewater Road Extension	2030M
95429	US 202 and US 1 Intersection Area Improvements	2030M
104821	I-476 Travel Management	2030M
107642	Smithbridge Road Corridor	2030M
110951	Macdade Boulevard Corridor Safety Improvements	2030M
111022	Chichester Avenue Corridor Safety Improvements	2030M
114034	US 322: Chelsea Parkway to Market Street Interchange (Section 103)	2040M
114102	West Chester Pk & 476 (Competitive CMAQ)	2030M
114112	Media Bypass ITS (Competitive CMAQ)	2030M
115427	Lansdowne Avenue Corridor Safety Improvements	2030M
118029	Bethel Roundabout	2040M
119435	SR 452/I-95 Improvements	2040M
119917	Concord Road / Bethel Road / Engle Street Intersection Improvement (Sec DBE)	2040M
120688	State Road 3007 Sec DMB Preliminary Design for Concord Road / McDonald Boulevard and Concord Road/Sunfield Drive Intersection Improvements	2040M
Montgomery County		
16438	PA 309, Connector Project - Phase I	2040M
16577	Ridge Pike: Harmon Road to Crescent Avenue	2040M
48172	PA 23 Moore to Allendale and Trout Creek Road Bridge	2040M
48174	PA 63, PA 152, Norristown Road at Maple Glen Triangle	2040M

MPMS Number	Project Title	AQ Analysis Code
48175	Ridge Pike: Belvoir Road to Chemical Road	2030M
48187	Henderson/Gulph Road Widen near I-76 Ramps	2040M
57176	PA 611 Bridge over PA Turnpike Willow Grove Interchange Ramps	2040M
63486	US 202, Johnson Highway to Township Line Road (61S)	2030M
64795	Belmont Rd/Rock Hill Rd Widening: I-76 Ramps to Rock Hill Road	2040M
81893	Marshall and Forrest Intersection R10	2026M
102273	Ridge/Germantown Intersection Realignment - Phase 1, Perkiomen Crossing	2030M
105803	PA 309 Connector: Souderton Pike to PA 309 (HT3)	2040M
106662	I-76 Integrated Corridor Management	2040M
110971	Main Street Safety Improvements	2030M
115429	Belmont Avenue and St. Asaphs Road Roundabout	2030M
116838	I-76 Flex Lanes: US 202 to I-476	2040M
116839	I-76 Flex Lane WB: US 1-Belmont Avenue	2040M
118032	Dekalb Street Two-Way Reconstruction	2040M
120281	South Collegeville Road (PA 29) at Perkiomen Boulevard	2030M
Philadelphia County		
17821	I-95: Race Street to Ann Street (GIR) - Design	2040M
47811	I-95: Bridge Street Design (Section BSR)	2040M
47812	I-95: Betsy Ross Interchange (BRI) - Design	2040M
47813	I-95: Ann Street to Wheetshaeaf Lane (AFC)	2040M
79828	I-95 Northbound: Race - Shackamaxon (GR5)	2040M
79905	I-95: Betsy Ross Mainline Northbound (BR3)	2040M
87784	I-95: Aramingo/Harbrson: Church Street to Amtrak (Section BS3)	2050M
96223	Philadelphia Signal Retiming	2030M
103553	I-95 Southbound: Race to Shackamaxon Streets (GR6)	2040M
103557	I-95 Northbound and Southbound: Tioga Street to Wheetshaeaf Lane (AF3)	2040M
103558	I-95 Northbound and Southbound: Ann Street to Tioga Street (AF4)	2040M
103559	I-95: Betsy Ross Mainline Southbound (BR4)	2040M
103563	I-95: Delaware Avenue Extension (BS5)	2050M
107648	North 5th Street Reformatting Signals	2030M
110958	Castor Avenue Roundabout	2026M
115434	Frankford Avenue Corridor Safety Improvements	2030M
115435	63rd Street Corridor Safety Improvements	2040M
115440	Washington Lane Corridor Safety Improvements	2030M
115687	I-95: Allegheny & Castor Ave Interchange	2040M
118035	5th Street Improvements	2040M
119822	US 1: Broad Street - Adams Avenue	2030M
119836	US 1: Adams Avenue - Old Lincoln Highway	2030M
Transit		
60540	Regional Parking Improvements	2030M
115472	SEPTA Projects of Significance	2040M

Source: DVRPC, 2025

Transportation Conformity Demonstration

Update: Connections 2050 Long-Range Plan, FFY 2026 TIP for New Jersey, and FFY 2025 TIP for Pennsylvania

Publication Number: 26106

Date Published: September 2025

Geographic Area Covered:

The nine-county DVRPC planning area, which covers the counties of Bucks, Chester, Delaware, Montgomery, and Philadelphia in Pennsylvania; and Burlington, Camden, Gloucester, and Mercer in New Jersey.

Key Words:

Air Quality, *Update: Connections 2050* Long-Range Plan, Multijurisdictional Nonattainment Area, National Ambient Air Quality Standards, Nonattainment Area, NO_x, Ozone, State Implementation Plan (SIP), Transportation Conformity, Transportation Improvement Program (TIP), Volatile Organic Compounds (VOCs).

Abstract:

The Delaware Valley Regional Planning Commission (DVRPC) demonstrates transportation conformity of its Draft *Update: Connections 2050* Long-Range Plan, Draft FFY 2026 TIP for New Jersey, and FFY 2025 TIP for Pennsylvania. A transportation conformity demonstration is required at least once every four years or when a metropolitan planning organization: (1) adopts a new LRP or TIP; or (2) amends, adds, or deletes a regionally significant, nonexempt project in a LRP or TIP. This conformity finding of the DVRPC LRP and TIP shows that they meet the National Ambient Air Quality Standards requirements governing ozone and fine particulate matter. This conformity finding reflects all amendments to the LRP and TIPs through June 2025.

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