



U.S. Department
of Transportation
**Federal Highway
Administration**

ARIZONA DIVISION

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April 25, 2016

In Reply Refer To:
(TRAP 19 – MPO)
(727)

Western Pinal County Non-attainment Area
Sun Corridor Metropolitan Planning Organization
Conformity Finding

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

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 Sun Corridor Metropolitan Planning Organization (SCMPO) finding of conformity and related documentation submitted in your March 15, 2016 letter, in coordination with the Environmental Protection Agency (EPA), the Maricopa Association of Governments (MAG) and the State Department of Transportation, the Federal Highway Administration and Federal Transit Administration have determined that the Casa Grande, Arizona urbanized area has 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 SCMPO and MAG MPO Planning Area Boundaries.

A Finding of Conformity is hereby made with respect to the subject FY2016-2025 Transportation Improvement Program (TIP) and 2040 Regional Transportation Plan as approved by the SCMPO Executive Board on March 15, 2016. A Finding of Conformity was made previously on the SCMPO Listing of Transportation Projects on July 9, 2015.

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,

Karla S. Petty
Division Administrator

ecc: Dennis Smith MAG (dsmith@azmag.gov), Michael Kies ADOT (mkies@azdot.gov), Dominique Paukowits (FTA Region 9), Colleen McKaughan EPA (mckaughan.colleen@epa.gov)
Internal



TO: Susanna Struble, Coolidge
Duane Eitel, Casa Grande
Lance Dunagan, Eloy
Kathy Borquez, Pinal Co.
Jerry James, ADOT Tucson District
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Jill Dusenberry, Coolidge
Charla Glendening, ADOT
Dennis Smith, MAG

Leslie Rogers, Federal Transit Administration
Karla Petty, Federal Highway Administration
Mike Kies, ADOT
Misael Cabrera, ADEQ
Ken Hall, Central Arizona Governments
Jerry Wamsley, U.S. EPA, Region IX
Dominique Paukowits, Federal Transit Administration
Ed Stillings, Federal Highway Administration

FROM: Irene Higgs, Sun Corridor MPO Acting Director

DATE: February 3, 2016

SUBJECT: Consultation on a Conformity Assessment for a the Draft FY 2016-2025 Sun Corridor MPO Transportation Improvement Program, Draft Regional Transportation Plan 2040, and the Draft 2016 Conformity Analysis

In accordance with the federal Clean Air Act, the Sun Corridor Metropolitan Planning Organization (MPO) is providing for consultation the Draft FY 2016-2025 Sun Corridor MPO Transportation Improvement Program (TIP) and Draft Regional Transportation Plan 2040 (RTP) for the Sun Corridor MPO planning area. The conformity assessment indicates that the Draft TIP and RTP satisfy the requirements of the federal transportation conformity rule and are in conformance with applicable air quality plans. Comments are requested on the enclosed documents by 1:00 pm on March 7, 2016.

A copy of the Draft 2016 Sun Corridor MPO Conformity Analysis (Attachment A) and draft TIP (Attachment B) is being provided for your review. A copy of the Draft RTP is available on the Sun Corridor MPO website at www.scmpo.org.

The minimum 30-day public comment period will be followed with a public hearing to be conducted on Tuesday, March 8, 2016 at 9 a.m. in Casa Grande, Arizona. It is anticipated that the Draft TIP and Draft Regional Transportation Plan (RTP) 2040, as well as the corresponding new conformity determination on the Draft TIP and Draft Regional Transportation Plan 2040, will be on the agenda for the March 8, 2016 Sun Corridor MPO Executive Board meeting. The Draft 2016 Sun Corridor MPO Conformity Analysis was prepared in accordance with the latest conformity criteria and consultation requirements issued by the U.S. Environmental Protection Agency.

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

Attachments

cc: Dean Giles, MAG
Teri Kennedy, MAG

ATTACHMENT A

CONSULTATION ON CONFORMITY ASSESSMENT FOR THE DRAFT FY 2016–2025 SUN CORRIDOR MPO TRANSPORTATION IMPROVEMENT PROGRAM AND DRAFT 2040 REGIONAL TRANSPORTATION PLAN

The Sun Corridor Metropolitan Planning Organization is conducting consultation on a conformity assessment for the Draft FY 2016–2025 Sun Corridor MPO Transportation Improvement Program (TIP) and the Draft 2040 Regional Transportation Plan (RTP). A new conformity determination is required on the draft TIP and 2040 Regional Transportation Plan. The conformity assessment indicates that the draft TIP and RTP satisfy the criteria specified in the federal transportation conformity rule for a conformity determination. A finding of conformity is therefore supported.

The federal conformity regulations at 40 CFR Parts 51 and 93 specify the criteria and procedures for conformity determinations for transportation plans, programs, and projects and their respective amendments. Under the federal transportation conformity rule, the principal criteria for a determination of conformity for transportation plans and programs are: (1) the TIP and Regional Transportation Plan must pass an emissions budget test with a budget that has been found to be adequate or approved by the U.S. Environmental Protection Agency (EPA) for transportation conformity purposes, or an interim emissions test; (2) the latest planning assumptions and emissions models specified for use in air quality implementation plans must be employed; (3) the TIP and Regional Transportation Plan must provide for the timely implementation of transportation control measures (TCMs) specified in the applicable air quality implementation plans; and (4) consultation.

The latest conformity determination on the Sun Corridor MPO Listing of Transportation Projects for the Pinal County nonattainment areas was made by the Federal Highway Administration and Federal Transit Administration on July 9, 2015. The results of the regional emissions analysis for the Pinal County nonattainment areas are described below and in Table 1.

Pinal County Nonattainment Areas Regional Emissions Analysis

For the Pinal County nonattainment areas, there are no adequate or approved motor vehicle emissions budgets for conformity. Therefore, the conformity interim emissions tests were applied. In selecting analysis years, the transportation conformity rule indicates that the years must be no more than ten years apart, the first year must be no more than five years beyond the year in which the conformity determination is being made, and the last year must be aligned with the transportation plan. The baseline and action tests were conducted for

PM-10 for the West Pinal PM-10 Nonattainment Area and for PM-2.5 and NOx for the West Central Pinal PM-2.5 Nonattainment Area for the analysis years of 2020, 2030, 2035 and 2040. For each test, the required emissions estimates were developed using the transportation and emission modeling approaches required under the federal transportation conformity rule.

The Maricopa Association of Governments and the Sun Corridor Metropolitan Planning Organization have coordinated on this amendment for inputs to the transportation model and for consultation on the conformity analysis. Both the MAG Metropolitan Planning Area Boundary and the Sun Corridor Metropolitan Planning Area Boundary include portions of the West Pinal PM-10 Nonattainment Area and West Central Pinal PM-2.5 Nonattainment Area. Both nonattainment areas are covered by the boundaries of the two metropolitan planning organizations. Consequently, transportation conformity is required to be demonstrated for both nonattainment areas by both metropolitan planning organizations.

For PM-10, the projected emissions for the action scenario are not greater than the projected emissions for the baseline scenario for each of the years analyzed: 2020, 2030, 2035 and 2040. Since the PM-10 emissions predicted for the action scenarios are not greater than the PM-10 emissions predicted for the baseline scenarios, the conformity interim emission test is satisfied. It is also reasonable to expect the action emissions would not exceed the baseline emissions for the time periods between the analysis years.

For PM-2.5, the projected emissions for the action scenario are not greater than the projected emissions for the baseline scenario for each of the years analyzed: 2020, 2030, 2035 and 2040. Since the PM-2.5 emissions predicted for the action scenarios are not greater than the PM-2.5 emissions predicted for the baseline scenarios, the conformity interim emission test is satisfied. It is also reasonable to expect the action emissions would not exceed the baseline emissions for the time periods between the analysis years.

For NOx, the projected emissions for the action scenario are not greater than the projected emissions for the baseline scenario for each of the years analyzed: 2020, 2030, 2035 and 2040. Since the NOx emissions predicted for the action scenarios are not greater than the NOx emissions predicted for the baseline scenarios, the conformity interim emission test is satisfied. It is also reasonable to expect the action emissions would not exceed the baseline emissions for the time periods between the analysis years.

Latest Planning Assumptions and Emissions Models

In accordance with federal conformity requirements, the latest planning assumptions and emissions models specified for use in air quality implementation plans were employed for this conformity determination. The latest planning assumptions used for this conformity determination are consistent with the January 2014 MAG Conformity Analysis for the FY

2014–2018 Transportation Improvement Program and the 2035 Regional Transportation Plan and the January 2014 Sun Corridor Metropolitan Planning Organization 2014 Conformity Analysis, with the following exceptions:

1. On October 7, 2014, EPA published a notice of availability of the MOVES2014 mobile source emissions model which began a two-year grace period that ends on October 7, 2016, after which MOVES2014 is required to be used for transportation conformity. EPA released a revised version, MOVES2014a, on November 4, 2015. The November 2015 version of MOVES2014a is used for this regional emissions analysis. MAG has also developed a MOVESLink2014 model that coordinates the TransCAD traffic assignment output with the MOVES2014a model.
2. The most recently available vehicle registration data was used in this conformity analysis. July 2015 vehicle registration data was obtained from the Arizona Department of Transportation (ADOT) for both Maricopa County and Pinal County.
3. MOVES2014a “Regulatory Class” output was used with the July 2015 vehicle registration data to estimate VMT distributions by weight-based vehicle class for each conformity traffic assignment. These vehicle weights were used to calculate the paved road PM-10 emissions in the Pinal PM-10 Nonattainment Area for the action and baseline scenarios in 2020, 2030 and 2040. The 2035 paved road emissions estimates were interpolated using the 2030 and 2040 values.
4. The latest projects included in the MAG FY 2014–2018 TIP and 2035 RTP, as well as projects in the new Sun Corridor MPO FY 2016–2025 TIP and 2040 RTP, were coded in the 2020, 2030, and 2040 traffic assignments used to estimate the action scenario emissions. The 2035 action scenario emissions were interpolated using the 2030 and 2040 values.

The traffic network coded in the 2020, 2030 and 2040 traffic assignments used to estimate baseline emissions for the Pinal PM-10 and PM-2.5 nonattainment areas includes regionally significant highways open to traffic, as well as transit service in operation, by December 31, 2015. In accordance with Section 93.119(h) of EPA conformity regulations, the baseline network also includes all regionally significant projects in the Pinal PM-10 Nonattainment Area, regardless of funding source, which are currently under construction or undergoing right-of-way acquisition; are programmed in FY 2015 of the previously conforming MAG FY 2014–2018 TIP; or have completed the National Environmental Policy Act (NEPA) process. The 2035 baseline emissions estimates were interpolated using the 2030 and 2040 values.

Emission reduction credit for projects in the MAG FY 2014–2018 TIP and the 2035 Regional Transportation Plan that pave unpaved roads in the Pinal PM-10 Nonattainment Area has been assumed in this conformity analysis for the 2020, 2030, 2035 and 2040 action scenarios.

In addition, emission reductions for paving projects in the Sun Corridor MPO TIP and 2040 Regional Transportation Plan are applied to the 2020, 2030, 2035 and 2040 action scenarios.

All analyses were conducted using the latest planning assumptions and emissions models in force at the time the conformity analysis began on January 5, 2016. A summary of the latest planning assumptions, including population, employment, and vehicle registrations data used in the regional emissions analysis, is provided in Table 2.

Timely Implementation of Transportation Control Measures

As noted in the 2014 Sun Corridor Conformity Analysis, a status report on Transportation Control Measures (TCMs) is not necessary since there are no applicable plans for the West Pinal PM-10 Nonattainment Area and West Central Pinal PM-2.5 Nonattainment Area.

Consultation

In compliance with federal and state rules, Sun Corridor MPO is required to provide reasonable opportunity for consultation with state air and transportation agencies, local agencies, U.S. Department of Transportation, Environmental Protection Agency, and other interested parties. For this conformity analysis, a 30-day consultation period is being provided on the conformity assessment contained in this memorandum. Consultation is concluded by notifying the agencies and other interested parties of any approval action taken by the Sun Corridor MPO Executive Board and any comments received during the period of consultation.

TABLE 1
 CONFORMITY INTERIM EMISSION (ACTION/BASELINE) TEST RESULTS
 (KILOGRAMS/DAY)
 PINAL COUNTY PM NONATTAINMENT AREAS

	PM-10 Nonattainment Area	PM-2.5 Nonattainment Area	
<i>Pollutant</i>	<i>PM-10</i>	<i>PM-2.5</i>	<i>NO_x</i>
2020			
- Action	81,805	25	1,028
- Baseline	83,646	26	1,077
2030			
- Action	82,591	19	815
- Baseline	84,486	21	1,028
2035			
- Action	83,257	23	891
- Baseline	85,108	26	1,269
2040			
- Action	84,043	26	967
- Baseline	85,730	30	1,510

TABLE 2. LATEST PLANNING ASSUMPTIONS FOR MAG CONFORMITY DETERMINATIONS

<u>Assumption</u>	<u>Source</u>	<u>MAG Models</u>	<u>Next Scheduled Update</u>
Population and Employment	Under the Governor’s Executive Order 2011-04, official County projections are updated every 3 to 4 years. These official projections are used by all agencies for planning purposes. Following the release of the 2010 U.S. Census data, the Arizona Department of Administration (ADOA) prepared a new set of Maricopa County projections in December 2012. MAG developed a set of employment projections for Maricopa County that are consistent with the ADOA population projections and also prepared subcounty population and employment projections. The MAG Regional Council approved the subcounty socioeconomic projections in June 2013. In addition, Central Arizona Governments (CAG) approved the Pinal County subcounty socioeconomic projections, based on the ADOA Pinal County projections, in June 2013.	AZ-SMART (UrbanSim/ OPUS)	Under the Governor’s Executive Order 2011-04, official county socioeconomic projections will be developed by the Arizona Department of Administration (ADOA). It is anticipated that ADOA will complete the county level projections in 2015 and MAG will prepare subcounty socioeconomic projections for adoption by the MAG Regional Council within six months after receipt of the ADOA county level projections.
Traffic Counts	The highway models were validated in 2013 for the 2011 base year, using approximately 3,300 traffic counts collected in 2011.	TransCAD	Region-wide traffic counts are typically collected by MAG every 2-4 years, if funds are available.
Vehicle Miles of Travel	The passenger travel demand models were calibrated in 2012-2013 using data from the 2008-2009 home interview survey, 2009 Transearch data, 2010-2011 regional transit on-board survey, 2011 Truck GPS data, and 2012 Airport and ASU surveys. The recalibration effort included a complete update of the regional travel demand model based on the relevant data sets listed above. Trip generation and trip distribution were recalibrated based on the 2008-2009 National Household Travel Survey Arizona Add-On sample and 2006 - 2009 American Community Survey and Public Use Microdata Sample data sets. Mode choice was recalibrated based on the 2010 on-board survey. The truck model was recalibrated based on the new 2009 Transearch data and 2011 Truck GPS data from ATRI. Special generator sub-models were recalibrated based on 2012 regional airports and ASU travel surveys. The external travel model was recalibrated in 2011 based on the 2008 external travel study. Volume-delay functions were recalibrated in 2012-2013 based on the 2011 commercial speed data. The overall base year for the recalibrated and validated model is 2011.	TransCAD	MAG has completed a major update, development and recalibration of the regional transportation model in FY 2013. The FY 2014 Unified Planning Work Program (UPWP) includes funding for the initiation of the next series of travel surveys in calendar years 2014-2016. These surveys will form a foundation for the next round of model development and updates. Various commercial data sources will be used to maintain and incrementally update the models in between the major recalibration updates.
Speeds	The highway models were validated using 49 million traffic speed records purchased from NOKIA for calendar year 2011.	TransCAD	Travel speed studies are conducted periodically to validate the transportation models. MAG has also purchased commercial speed data for future estimation and model calibration purposes.



TO: Susanna Struble, Coolidge
Duane Eitel, Casa Grande
Lance Dunagan, Eloy
Kathy Borquez, Pinal Co.
Jerry James, ADOT Tucson District
Scott DiBiase, Pinal Co. Air Quality
Jill Dusenberry, Coolidge
Charla Glendening, ADOT
Dennis Smith, MAG

Leslie Rogers, Federal Transit Administration
Karla Petty, Federal Highway Administration
Mike Kies, ADOT
Misael Cabrera, ADEQ
Ken Hall, Central Arizona Governments
Jerry Wamsley, U.S. EPA, Region IX
Dominique Paukowits, Federal Transit Administration
Ed Stillings, Federal Highway Administration

FROM: Irene Higgs, Sun Corridor MPO Acting Director

DATE: March 21, 2016

SUBJECT: Notification of Conclusion of Consultation on a Conformity Assessment for the Draft FY 2016-2025 Sun Corridor MPO Transportation Improvement Program, Draft Regional Transportation Plan 2040, and the Draft 2016 Conformity Analysis

On February 3, 2016, the Sun Corridor Metropolitan Planning Organization (MPO) transmitted a conformity assessment for the Draft FY 2016-2025 Sun Corridor MPO Transportation Improvement Program, Draft Regional Transportation Plan 2040, and the Draft 2016 Conformity Analysis.

This memorandum completes the consultation process by notifying the agencies listed above and other interested parties of the Sun Corridor MPO Executive Board approval of the Draft FY 2016-2025 Sun Corridor MPO Transportation Improvement Program, Draft Regional Transportation Plan 2040, and the Draft 2016 Conformity Analysis and any comments received during the period of consultation. A copy of the response to comments received during the consultation period is attached. Copies of the conformity assessment may be obtained from the Sun Corridor MPO. Copies of the Executive Board meeting agendas and approved minutes are available at www.scmpo.org, or they may also be requested from the Sun Corridor MPO.

If you have any questions or comments, please contact Irene Higgs at (520) 705-5143.

cc: Dean Giles, MAG
Teri Kennedy, MAG

RESPONSE TO COMMENTS ON THE DRAFT FY 2016-2025 SUN CORRIDOR MPO TRANSPORTATION
IMPROVEMENT PROGRAM, DRAFT REGIONAL TRANSPORTATION PLAN 2040, AND THE DRAFT 2016
CONFORMITY ANALYSIS

February 21, 2016

On February 3, 2016, the Sun Corridor Metropolitan Planning Organization (MPO) transmitted a conformity assessment for the Draft FY 2016-2025 Sun Corridor MPO Transportation Improvement Program, Draft Regional Transportation Plan 2040, and the Draft 2016 Conformity Analysis. In addition, on March 8, 2016, the Sun Corridor Metropolitan Planning Organization (MPO) held a public hearing for the Draft FY 2016-2025 Sun Corridor MPO Transportation Improvement Program, Draft Regional Transportation Plan 2040, and the Draft 2016 Conformity Analysis. The following represents the Sun Corridor MPO response to the comments received.

COMMENTS FROM MIKE KIES, ADOT MULTIMODAL PLANNING DIVISION (Comments were received from Charla Glendening on Behalf of Mike Kies via email on March 4, 2016)

DRAFT REGIONAL TRANSPORTATION PLAN 2040

Comments: Pages 27-29: The three population density maps (current and 2 future projection density maps) could benefit by including a boldly visual and easily identifiable title to identify each maps as 2015, 2025, and 2040 population densities respectively. While this distinction is captured within the legend of each map, given the similarities between the three maps this distinction may not be quickly/easily seen.

Response: Will revise as noted and include in final copy of RTP.

Comments: Pages 35-37: Same map labeling comment as stated above.

Response: Will revise as noted and include in final copy of RTP.

Comments: Page 39: Is the “female head of household” definition the most accurate and contemporary definition available?

Response: Will change to: “Female Head of Household: Household in which female is primary income provider and no husband is present.”

Comments: Pages 55-57: Same map labeling comment as stated above.

Response: Will revise as noted and include in final copy of RTP.

Comments: Page 62: Pie chart of Casa Grande in Table 1 includes the wrong percentage for Good, very good, or excellent condition (should read 82% not 62%).

Response: Will revise as noted and include in final copy of RTP.

Comment: Page 72: Is there data to show a distinction between enplanements, recreational flights, and freight/commercial flights within the general term of “annual operations” indicating general take-offs and landings.

Response: Revised Table 11 to include a breakdown of information on annual operations that is provided by the FAA:

- Commercial Operations
- Commuter Services
- Air Taxi operations
- General Aviation Local operations (within 20 miles of airport)
- General Aviation Itinerant Operations(excludes commercial and air taxi, and local)
- Military Aircraft Operations

Comments: Page 88: If available, include a higher resolution image for this page.

Response: Will revise as noted and include in final copy of RTP.

Comments: Appendix Maps: Same map labeling comment as stated above for each additional map may be beneficial.

Response: Will revise as noted and include in final copy of RTP

EXECUTIVE SUMMARY

Comments: Page 1: The “What is a Metropolitan Planning Organization” should be “What is a Regional Transportation Plan”.

Response: Will be included in final copy of RTP.

Comments: Page 5: Pie chart of Casa Grande in Table 1 includes the wrong percentage for Good, very good, or excellent condition (should read 82% not 62%).

Response: Will revise as noted and include in final copy of RTP.

Comments: Pages 9-11: Are there tangible and measurable goals for the 2020 Target statements? (ex. Targeted % decrease in annual vehicle hours traveled or % increase in annual vehicle revenue miles)

Response: TAC discussion and decision was that specific targets would not be established at this point. As the RTP is updated, and state targets are established, it will be discussed how Sun Corridor MPO targets can be set and inform the state targets. No changes recommended.

Comments: Page 11: The Recommended Investment Strategy chart does not align with the description provide in Figure 6 on page 8 in regards to Expansion vs. Capacity.

Response: Will revise as noted and include in final copy of RTP.

COMMENTS FROM MR. JAMES KENNY, ON BEHALF OF INTERSTATE 11 COALITION (Comments received at the March 8, 2016 - SCMPO Public Hearing)

DRAFT REGIONAL TRANSPORTATION PLAN 2040

Comment: Here at the nexus of Interstate 8 and Interstate 10, Casa Grande and its neighbors have experienced the transformative benefit of transportation related economic development. I know that funding is scarce; however, as we move forward with the RTP and TIP, I hope that we can address I-11 and bring it forward into the four year plan. ADOT has just completed multiple years of studies on the

corridor and just launched the Tier I Environmental Impact Statement (EIS). Governor Ducey, this week or late last week announced a MOU with the Governor of Mexico, in which Mexico committed \$2.1 billion to the improvement of surface transportation south of the border that will connect Mexico City all the way up to Nogales. I believe it is time for us to do our part to get Arizona in that game. We need access to north-south to markets to Intermountain West Corridor, as well as Canada and Mexico itself. This transportation project, for every billion dollars spent, according to the WP Carey School, will add 30,000 to 34,000 permanent jobs for every billion dollars spent. So I respectfully submit that this has the greatest game change potential and is required to handle the future growth in this region that we all know is coming. So I urge the Board to use its influence to address and adopt I-11 in the TIP. Any influence you can have with the State Transportation Board will enable as ADOT moves forward with the Tier 1, any evidence for inclination for its funding will help us line up P3 Partners. Because we know this will become a Public Private Partnership to get built. To underscore I-11 is probable the biggest chance we have to do game changing economic benefit for our region.

Response: The future Interstate 11 is supported in the Regional Transportation Plan. The Sun Corridor MPO RTP 2040: Creating Connectivity includes a description of I-11 on page 101, under "Strategic Projects". The Sun Corridor MPO supports development of the I-11 Corridor. Sun Corridor MPO staff and Technical Advisory Committee member agencies will continue to participate in technical advisory committee meetings and other activities required to support corridor definition and development. Sun Corridor MPO is a member of CAN-DO: The Interstate 11 Coalition.

COMMENT FROM MR. JON THOMPSON, CITIZEN (Comments received at the March 8, 2016 - SCMPO Public Hearing)

DRAFT REGIONAL TRANSPORTATION PLAN 2040

Comment: It was brought to my attention right at the beginning of this meeting, regarding the Sun Corridor Regional Transportation Plan 2040, our engineer mentioned to me under the item vehicle mobility, the City of Coolidge asks that SR87 be added to the prioritization matrix for vehicle mobility in the 10 point category, because the City does not have connectivity to I-10 or I-8.

Response: The RTP implements a performance-based planning process. The project selection criteria are intended to lead to projects that provide the most regional benefit, consistent with the scoring criteria. Under "Vehicle Mobility", "Project improves connectivity to Project improves regional connectivity", and "Project is located on a route that provides direct connectivity to I-10 or I-8, or project completes a missing link/segment: 10 points", SR 87 would be considered a roadway that connects directly to I-10. As such, improvements to SR 87 would receive 10 points. We will revise the scoring criteria to provide examples of roadways that connect to I-10, so that the criteria will read: "Project is located on a route that provides direct connectivity to I-10 or I-8 (examples include SR 87, Florence Blvd, and other roadways with an interchange connection to I-10), or project completes a missing link/segment: 10 points"

COMMENT FROM MS. OLIVIA B. GUERRERO, PINAL GILA SENIOR COUNCIL (Comments received at the March 8, 2016 - SCMPO Public Hearing)

DRAFT REGIONAL TRANSPORTATION PLAN 2040 and DRAFT FY 2016-2025 SUN CORRIDOR MPO TRANSPORTATION IMPROVEMENT PROGRAM

Comment: I would like to thank you, the cities and the towns for coming together to work on transportation issues in the Sun Corridor. Seniors rely heavily on your current 5310/5311 programs in each one of your towns. However, we need a future study for 5307 and a study for 5311 in Eloy would really help us for connectivity of the transit system currently operating under the 5310 program. These programs provide great resources for each one of the senior centers, getting people back and forth, getting people to the grocery store maybe once a week, specific medical appointments especially with our rapid growth of senior population and one of the fastest growing senior populations in the state. We are just not keeping up. So I advocate, do these studies and do them well. Help us to seek the funding to get these transit systems operating, plus connecting the different routes in the local communities.

Response: The Sun Corridor MPO supports transit planning activities and coordination among all transit providers in both Pinal and Gila counties. The Sun Corridor RTP has established a goal to increase the number of residents and visitors served by transit in the region. The goal will be achieved by our continued partnership with the Central Arizona Governments (CAG). CAG provides the FTA/ADOT required Mobility Management and Transit Coordination activities for the Sun Corridor MPO region. The Sun Corridor MPO has received Federal Transit Administration (FTA) 5304 planning funds to conduct a Transit Feasibility Study for the City of Casa Grande. This study will benefit the overall wellbeing of the community and MPO region by identifying the specific needs for coordination with neighboring transit programs, gaps in service and alternative modes of transportation. It will promote cooperative, continuous, and comprehensive coordination with the state to ensure public transportation performance measures are obtained. This study is scheduled to begin in the Fall of 2016. The Sun Corridor MPO, in coordination with the City of Eloy, will pursue future FTA grant funding to do a Transit Feasibility Study for the City of Eloy.

Vehicle Registrations	July 2015 vehicle registrations were provided by ADOT.	MOVES2014a	When newer data become available from ADOT.
Implementation Measures	Latest implementation status of commitments in prior SIPs.	N/A	Updated for every conformity analysis.