

MAG MPO  
TransPlan50 Amendment 3  
Emissions Analysis Report  
Prepared August 11, 2025

Public Comment Period Oct 13, 2025 - Nov 13, 2025  
MPO Board Approval November 13, 2025



M A G

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## TERMS AND ABBREVIATIONS

CAA	Clean Air Act
CFR	Code of Federal Regulations
CMAQ	Congestion Mitigation and Air Quality
CO	Carbon Monoxide
BIL Act	Bipartisan Infrastructure Investment and Jobs Act of 2021
GPI	Kem C. Gardner Policy Institute
HDDV	Heavy Duty Diesel Vehicle (8501 lbs. and heavier gross vehicle weight)
HOV	High Occupancy Vehicle
HPMS	Highway Performance Monitoring System
I/M	Inspection and Maintenance
LDGV	Light Duty Gas Vehicle (0-6000 lbs. gross vehicle weight)
LDGT1	Light Duty Gas Truck 1 (0-6,000 lbs. Gross vehicle weight)
LDGT2	Light Duty Gas Truck 2 (6,001-8,500 lbs. Gross vehicle weight)
LEV	Low Emission Vehicle
MOVES	Motor Vehicle Emission Simulator
MPO	Metropolitan Planning Organization
RTP	Regional Transportation Plan
NAAQS	National Ambient Air Quality Standards
NEPA	National Environmental Policy Act
NO <sub>x</sub>	Oxides of Nitrogen
OBD	On Board Diagnostics
O <sub>3</sub>	OZONE
PM10	Particulate matter smaller than or equal to 10 microns
PM2.5	Particulate matter smaller than or equal to 2.5 microns
REMM	Real Estate Market Model
RFG	Reformulated Gasoline
RVP	Reid Vapor Pressure
SIP	State Implementation Plan
STIP	State Transportation Improvement Program
TCM	Transportation Control Measures
TDM	Travel Demand Model
TIP	Transportation Improvement Program
VMT	Vehicle Miles Traveled

## AGENCIES

MAG	Mountainland Association of Governments
DAQ	Division of Air Quality
EPA	Environmental Protection Agency
FHWA	Federal Highway Administration
FTA	Federal Transit Administration
UDOT	Utah Department of Transportation
UTA	Utah Transit Authority
WFRC	Wasatch Front Regional Council
CMPO	Cache MPO
DWS	Department of Workforce Services

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**MAG MPO Board resolution adopting MAG TransPlan50 Amendment 3 and associated Air Quality Emissions Analysis**

**WHEREAS**, Mountainland Association of Governments (MAG) is the designated Metropolitan Planning Organization (MPO) for transportation planning in the Urbanized Area of Utah County; and

**WHEREAS**, the Bipartisan Infrastructure Investment and Jobs Act (BIL) of 2021 and the Clean Air Act Amendments (CAA) require the MPO to develop TransPlan50 - Regional Transportation Plans (RTP) and short-range Transportation Improvement Programs (TIP) that conform with the applicable State Implementation Plan (SIP) for air quality; and

**WHEREAS**, MAG TransPlan50 was developed to meet the requirements of the CAA and the BIL Act, and to address the short- and long-term transportation needs of the Region, and

**WHEREAS**, MAG TransPlan50 has been developed in compliance with 23 CFR 450.322, Metropolitan Transportation Planning Process through appropriate technical and review processes, and

**WHEREAS**, the Conformity Determination Report covering the TransPlan50 has been developed to meet the requirements of 40 CFR 93 and the emission limits set for SIP for the State of Utah, and

**WHEREAS**, MAG TransPlan50 in its entirety was developed in cooperation with the MPO's planning partners and reflects local commitment for project implementation.

**NOW, THEREFORE, BE IT RESOLVED** that MAG MPO Board adopts the MAG TransPlan50 and the Conformity Determination Report in its entirety.

**BE IT FURTHER RESOLVED** that MAG MPO Board authorizes staff, with approval of the Chairman of the Committee, to make non-substantive technical corrections to the final document as necessary.

APPROVED AND PASSED THIS 13 of November, 2025

  
\_\_\_\_\_  
MPO BOARD CHAIR, MAYOR Bill Wright

ATTEST: 



## U.S. Department of Transportation

Federal Transit Administration  
1961 Stout Street, Suite 13501  
Denver, CO 80294-3007

Federal Highway Administration  
2520 West 4700 South, Suite 9A  
Salt Lake City, UT 84129

December 18, 2025

In reply refer to:  
HDA-UT

Mr. Carlos Braceras  
Executive Director  
Utah Department of Transportation  
4501 South 2700 West  
Salt Lake City, Utah 84119

Ms. Michelle Carroll  
Executive Director  
Mountainland Association of Governments  
586 East 800 North  
Orem, UT 84097

Subject: MAG Regional Transportation Plan 2023-2050 [Transplan50] Amendment #3  
**Conformity Determination**

Dear Mr. Braceras and Ms. Carroll:

This letter responds to your December 9, 2025, request for a conformity determination for Amendment #3 to the Emissions Analysis Report for the Mountainland Association of Governments (MAG) 2023–2050 Regional Transportation Plan (RTP), referred as [Transplan50](#), for the Utah Valley urbanized area. The regional emissions analysis report and Transplan50 [Amendment #3](#) were adopted by the MAG Board on November 13, 2025. Interagency consultation and the public comment period have been completed, and the U.S. EPA provided FHWA/FTA with concurrence on this conformity determination on December 12, 2025. FHWA/FTA have determined that the [emissions analysis report](#) dated August 11, 2025, demonstrates that Amendment #3 to the MAG 2023–2050 RTP conforms to all applicable air quality requirements in 40 CFR Part 93, subpart A.

The Provo PM<sub>2.5</sub> maintenance plan received final EPA approval on November 19, 2025, with an effective date of December 19, 2025. However, EPA previously determined the maintenance plan's budgets to be adequate through the process described in 40 CFR 93.118(f)(2). Under paragraph 93.118(f)(2)(iii), when EPA issues an adequacy finding as part of a final rulemaking that approves the SIP submission, the adequacy finding becomes effective on the date the approval is published in the Federal Register. Accordingly, the effective date of the PM<sub>2.5</sub> maintenance plan budgets for transportation conformity purposes is November 19, 2025.

Because this adequacy finding became effective after MAG Board adoption of Amendment #3 but prior to FHWA's request for a conformity determination, EPA has advised that applying the budget test for the PM<sub>2.5</sub> conformity analysis in this amendment is reasonable and appropriate. EPA further noted that the MAG Board's adopting resolution allows technical revisions. Therefore, EPA recommends that the conformity determination reflect that MAG has met the budget test requirements under 40 CFR 93.118 for the Provo PM<sub>2.5</sub> area, [contingent upon a technical revision](#) to the emissions analysis report that

clearly states that the PM<sub>2.5</sub> budget test has been satisfied.

If you have any questions regarding this conformity determination, please contact Edward Woolford at (801) 955-3524.

Sincerely,

Ivan Marrero, P.E.  
Division Administrator

cc: Kerry Doane, UTA  
Andrea Olson, UDOT  
Rick McKeague, UDAQ  
Greg Lohrke, EPA  
Wayne Bennion, WFRC  
Tracey MacDonald, FTA  
Peter Hadley, FTA  
LaNiece Davenport, MAG  
Shauna Mecham, MAG  
Kevin Feldt, MAG  
Robert Allen, MAG  
Edward Woolford, FHWA  
Kelly Lund, FHWA

## EXECUTIVE SUMMARY

This report is a new emissions analysis for MAG TransPlan50 Amendment 3.

As the MPO, MAG is responsible for developing, producing, and adopting the Metropolitan Transportation Plan (MTP), TIP, and the Unified Planning Work Program (UPWP). MAG has the responsibility to ensure that the MAG TransPlan50 for the Utah Valley urbanized area **conforms** to the air quality requirements of the State Implementation Plan (SIP) and the Environmental Protection Agency (EPA) budget and interim emissions tests for all pollutants in non-attainment or maintenance areas (40 CFR 93.118 and 40 CFR 93.119). This responsibility will be fulfilled when the MAG MPO Board approves the Conformity Determination Report. Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) review this document in consultation with the EPA to ensure that all relevant planning regulations have been adequately addressed.

"Under 23 CFR Part 450 and the BIL Act, federally funded projects cannot be approved, funded, advanced through the planning process, or implemented unless those projects are in a Fiscally Constrained and Conforming Transportation Plan and Transportation Improvement Program."

### Summary Of Amendment

MAG is proposing adding and changing 4 RTP projects. These amendments result from recommendations made by the Utah Transportation Commission in May 2025, updates from the Nebo Beltway Study. The result is two new roadway projects in Fiscally Constrained (FC) Phase 1 and two projects added to the needs-based (not fiscally constrained) plan, which are not modeled for air quality since only the FC plan is considered. For more information on the amended projects, see [magutah.gov/rtp-amendment-3](https://magutah.gov/rtp-amendment-3), which is live during the public comment period of October 13 to November 13, 2025.

**Amended RTP Projects**

# I-15; Payson to Santaquin

Payson 800 South to Utah County Line

Phase 1 Fiscally constrained

Estimated Cost: \$164.5M

From Transportation Commission



## I-15/Santaquin Main ST Interchange

Santaquin Main St

Phase 1 Fiscally constrained

Estimated Cost: \$115M

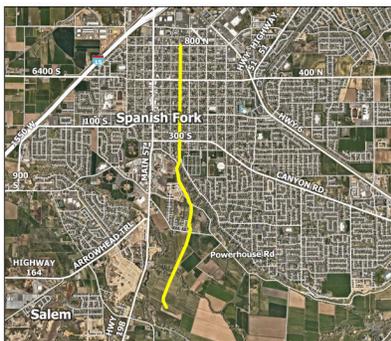
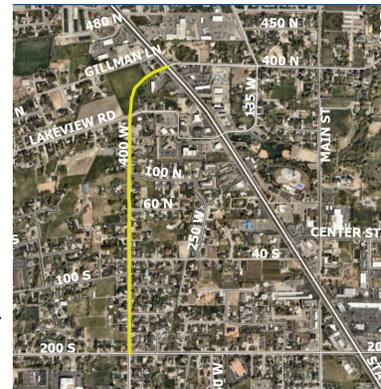
From Transportation Commission Recommendation

Needs-Based Projects (not included in air quality model)

## Lindon 400 W

Estimated Cost: \$13m

Multiple Phases: Adding connection on north end, adding signal on State Street, widening southern portion to minor arterial cross sections



## Spanish Fork 300 E

Spanish Fork 900 N to Salem 400 N

Not fiscally constrained

Estimated Cost: \$51.7M

## **Transportation Conformity**

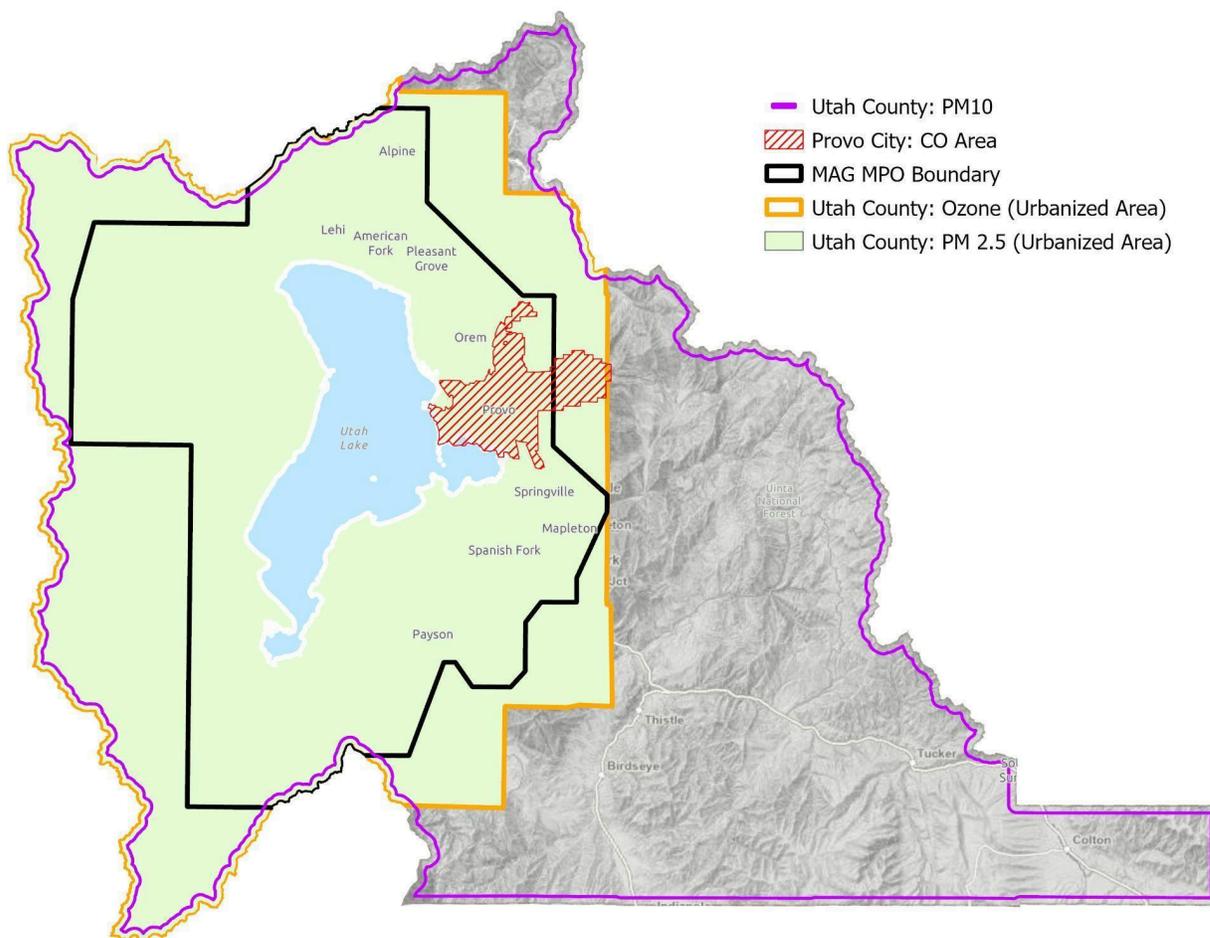
A Basic Guide for State and Local Officials United States Department of Transportation (US-DOT)

This report updates the conformity analysis and describes the changes made to the travel model transportation networks.

Approval of these documents by FHWA and FTA allows the policies, programs, and projects to be implemented using Federal Funding.

All assumptions used in this determination report were found to be consistent with federal regulations at various stages of the development of MAG TransPlan50.

## Utah County Non-Attainment and Maintenance Areas Map



Provo City is designated as a Maintenance Area for Carbon Monoxide. Utah County is designated as a maintenance area for PM10, and the Urbanized area of Utah County is a non-attainment area for 2006 PM2.5 (pending the EPA's approval of the Maintenance Plan) and marginal non-attainment for 2015 Ozone. The MAG TDM includes the entirety of Utah County, not just the MPO, and models the non-attainment areas within the MPO boundary and the donut areas for Ozone, PM2.5, and PM10, respectively.

## CONFORMITY TESTS

Conformity Analysis Tests Table summarizes the specific quantitative conformity tests required by the conformity rules based on the SIP for each non-attainment or maintenance area pollutant in the MAG area.

PM10: Effective March 27, 2020, Utah County was redesigned as a maintenance area for PM10 with the associated Maintenance Plan and 2030 NOx and PM10 Motor Vehicle Emissions Budgets.

CO: Effective July 13, 2020, Provo City entered its 2<sup>nd</sup> 10-year Carbon Monoxide (CO) maintenance plan. This plan follows the provisions/requirements of the CO Limited Maintenance Plan (LMP) Policy. The CO LMP does not require a regional emissions test for a conformity determination. Other aspects of transportation conformity, such as consultation, fiscal constraint, and hot spot analysis, still apply. According to the EPA, "... it is unreasonable to expect that an LMP area will experience so much growth in that period that a violation of the CO NAAQS would result. Therefore, for the Provo CO maintenance area, all actions that require conformity determinations for CO under our conformity rule provisions are considered to have already satisfied the regional emissions analysis and "budget test" requirements in 40 CFR 93.118."

PM2.5 Effective May 10, 2019, Utah County was declared a Clean Data PM2.5 non-attainment area. In collaboration with stakeholders, the State is required to prepare a PM2.5 Maintenance Plan. Until the EPA approved the plan, the MPO must perform interim conformity tests for the 2006 PM2.5 non-attainment area.

(Technical revision Dec 22, 2025)

The EPA proposed approval of Utah's PM2.5 SIP with the associated Maintenance Plan and 2034 emissions budgets in the Federal Register on November 6, 2020. The Provo PM2.5 maintenance plan received final EPA approval on November 19, 2025, with an effective date of December 19, 2025. However, EPA previously determined the maintenance plan's budgets to be adequate through the process described in 40 CFR 93.118(f)(2). Under paragraph 93.118(f)(2)(iii), when EPA issues an adequacy finding as part of a final rulemaking that approves the SIP submission, the adequacy finding becomes effective on the date the approval is published in the Federal Register. Accordingly, the effective date of the PM2.5 maintenance plan budgets for transportation conformity purposes is November 19, 2025. Because this adequacy finding became effective after MAG Board adoption of Amendment #3 but prior to FHWA's request for a conformity determination, EPA has advised that applying the budget test for the PM2.5 conformity analysis in this amendment is reasonable and appropriate. EPA further noted that the MAG Board's adopting resolution allows technical revisions. Therefore, EPA recommended that the conformity determination reflect that MAG has met the budget test requirements under 40 CFR 93.118 for the Provo PM2.5 area.

Ozone: Effective August 3, 2018, Utah County was declared a Marginal OZONE non-attainment area with the requirement to perform an interim conformity test for the 2015 Ozone non-attainment area. Effective November 7, 2022, EPA determined that the Southern Wasatch Front marginal area (MAG) attained the standards by August 3, 2021, the applicable attainment date. After the State submits a Limited Maintenance Plan for the Southern Wasatch Front, MAG will only be required to complete a qualitative conformity assessment for ozone. MAG will continue to use the interim emissions tests until the SIP and associated mobile emissions budget are approved. The TDM excludes portions of the county not in the Ozone Non-Attainment area.

### Conformity Analysis Tests Table

Area	Non-attainment and SIP Status	Pollutants	Test Period	Quantitative Tests
<b>Provo CO</b>	Approved Maintenance SIP	CO	Limited Maintenance Plan	None
<b>Utah County PM 10</b>	Approved Maintenance SIP	NOX precursor Direct PM10	Maintenance Plan	Emissions Budget
<b>Utah County Ozone</b>	Attained in 2021 (Limited Maintenance SIP Pending)	NOX precursor VOC precursor	Interim Test	Build ≤ 2017
<b>Utah County PM 2.5</b>	2006 PM2.5 Approved Maintenance SIP	NOX precursor VOC precursor Direct PM2.5	Maintenance Plan	Emissions Budget

The conformity rules outline specific analysis requirements that non-attainment areas must follow depending on the severity of the non-attainment problem and the time frame established by the Clean Air Act to maintain National Ambient Air Quality Standards.

The following list describes the appropriate subsections of 40 CFR Part 93 the plan must

meet:

- 93.110 – Latest Planning Assumptions
- 93.111 – Latest Emission Model
- 93.112 – Consultation

TransPlan50 and TIP:

- 93.113(b) – Transportation Control Measures (RTP)
- 93.113(c) – Transportation Control Measures (TIP)
- 93.118 or 93.119 – Emission Budget(s) or Emission Reduction

## 93.110 - LATEST PLANNING ASSUMPTIONS

Section 93.110 of the transportation conformity rule defines the requirements for the most recent planning assumptions that must be in place during the conformity determination process. The planning assumptions relate to the socio-economic forecasts, transit operating policies, transit capital program policies, and transit fare policies that impact the travel demand modeling. All planning assumptions have been reviewed and agreed to through the interagency consultation process at various stages of the TransPlan50 development.

MAG initially ran MOVES for 2019, 2028, 2032, 2042, and 2050 with all needs-based projects. The results were within established budgets. The emissions shown in this document are based on the fiscally constrained project list as of May 2025.

### Analysis Years

Conformity must be determined for TransPlan50, which includes the TIP in the non-attainment and/or maintenance areas. While other requirements of the Metropolitan Transportation Planning Process dictate the financial feasibility and related programming and planning procedures, conformity is based largely on analyzing specific years chosen according to the criteria found under Section 93.118. The following rules have been followed to define the analysis years in the MAG study area:

- Any year for which the implementation plan establishes a Motor Vehicle Emission Budget—PM10 2030 is a budget year under the new maintenance plan. For the CO maintenance plan, 2015 was a budget year, though quantitative analysis is no longer required.
- The first horizon year must be no more than 10 years from the first year of the plan (2023)
- If the attainment year (2003 for PM10, 2014 for CO, 2021 for Ozone) is within the transportation plan's time span, it must be a horizon year.
- For PM2.5 - The first horizon year must be no more than 5 years from the analysis year.
- For PM2.5 - 2035 is an analysis year
- For Ozone - the baseline year is 2017
- For Ozone - The first horizon year must be no more than 5 years from the analysis year until the LMP is approved.
- Horizon years may be no more than 10 years apart.
- The final horizon year must be the last year of the transportation plan, and 2050 applies to all analyses.

Conformity Analysis Years Table summarizes the analysis years for the three

non-attainment areas in the MAG modeling area.

### Conformity Analysis Years

Area	Pollutant	Analysis Year(s)
Utah County	PM10	2030 2040 2050
Utah County	PM2.5	2028 2035 2042 2050
Utah County	Ozone	2028 2032 2042 2050

### Socio-Economic Forecasts

Perhaps the greatest influence on the magnitude of pollutant emissions resulting from the transportation system is the growth rate of people, jobs, households, and related socio-economic measures. The conformity rules require that the socio-economic inputs used in the analysis represent the latest available estimates. Added socio-economic variables for dwelling units, automobile ownership, and stratified household size are also forecast by MAG down to the individual traffic zone level. Due to difficulties with 2020 census data, MAG used the county assessor's and American Community Survey data for the residential base year. For the employment base year, MAG used building square foot data from the county assessor's and Department of Workforce Services (DWS) employment data.

### Land Use Allocations

In addition to review by local municipalities, land use allocations feeding into the model were reviewed by a group of stakeholders, including developers, environmentalists, and other concerned and interested citizens.

### Zonal Data

Travel models create a unique spatial framework for describing travel demand. The study area is subdivided into small geographic units called Traffic Analysis Zones (TAZ).

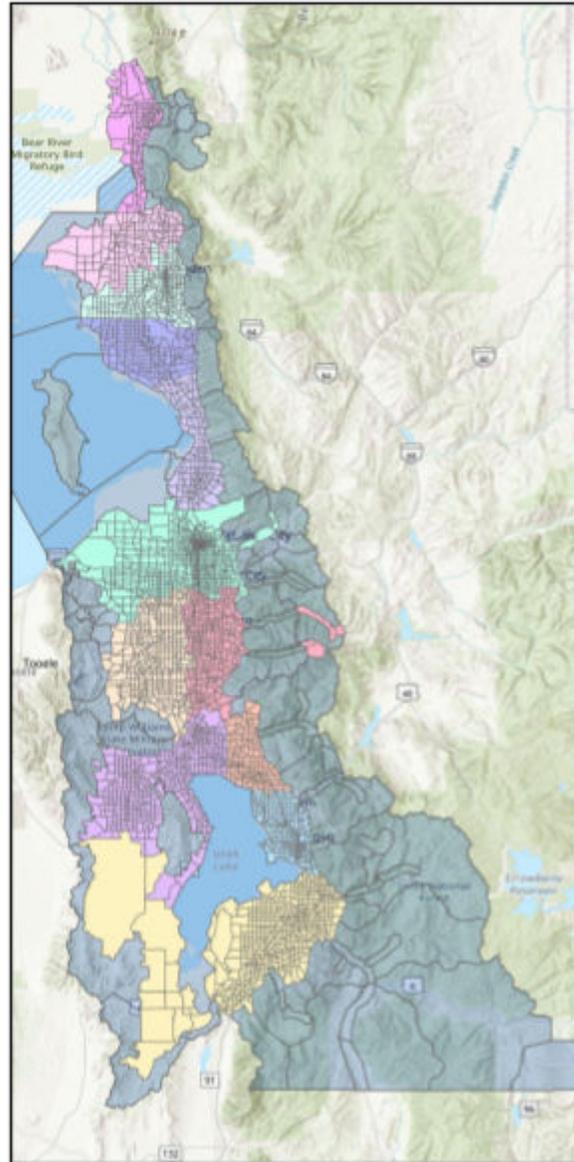
The zonal systems for this effort are a 1,311-zone system for the Salt Lake Area, a 428-zone system for the Ogden Area, and a 1,316-zone system for the Utah County Area. Census tract boundaries do not bisect zones; thus, each area's census tract contains one or more TAZ.

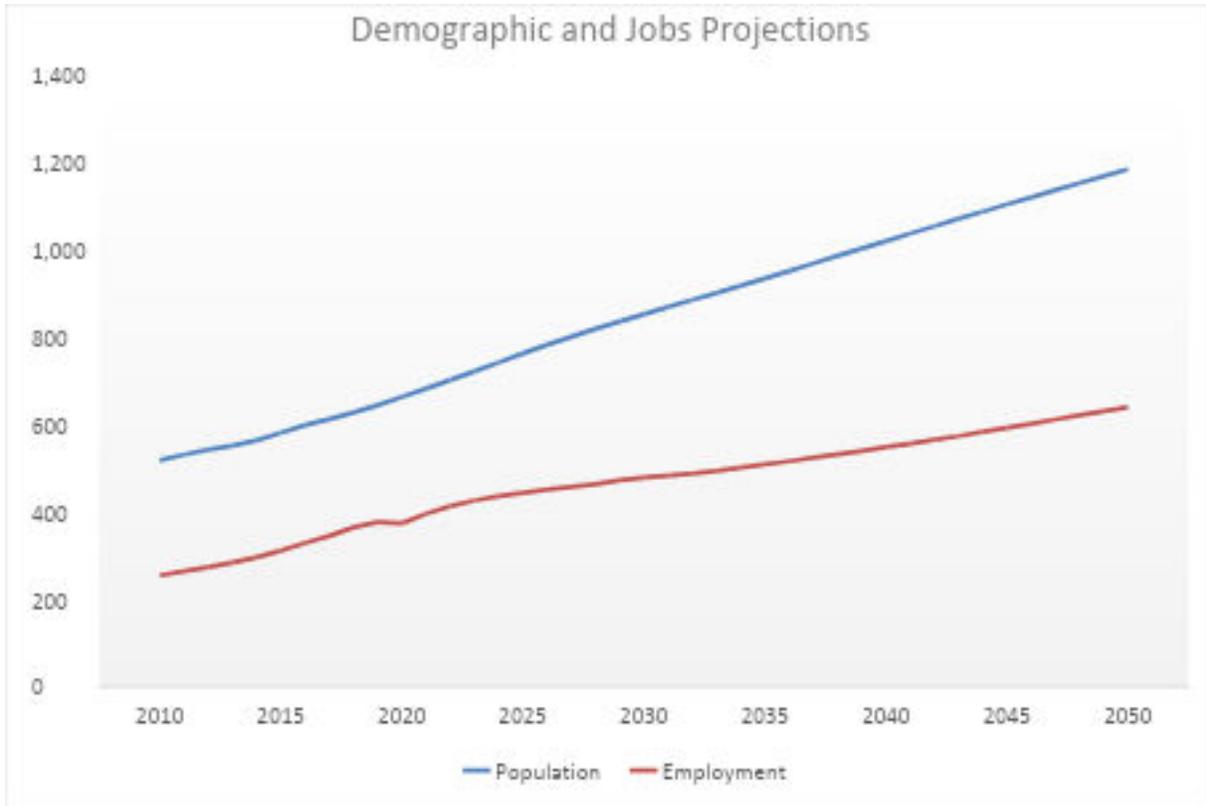
### Population & Employment

MAG and the Wasatch Front Regional Council (WFRC) estimate TAZ's economic and demographic data using information provided by GPI and employment data provided by the DWS. Future-year projections of socio-economic data begin with control totals provided by the Center. These are the state's official demographic estimates and forecasts, which are published for each county in the state.

Each MPO allocates the population, households, and employment to the TAZ. The zone allocation is done based on local master plans and with local planners. Detailed projections are made for 2020, 2030, 2040, and 2050, beginning in 2015. Estimates for intermediate years are not post-processed but exist as raw land use model output. Household data has been stratified by (1) the number of persons per household and (2) the number of vehicles used by the household. The model applies a set of equations to this data to calculate the expected number of person-trips for each household based on *household size/number of vehicles* combination totals for each TAZ.

**Wasatch Front Travel Model TAZ Zone Map**





### Projects In The TIP and Regional Transportation Plan

All the projects identified in TransPlan50 are included in the regional emissions analysis. The plan is fiscally constrained – containing only projects with an identified funding source. Estimated funding levels are based on current funding levels and reasonable assumptions that these funds will be continued in the future.

**Regionally Significant Projects** (40 CFR 93.101): a transportation project (other than an exempt project) on a facility that serves regional transportation needs. This includes access to and from the area outside of the region, major activity centers in the region, major planned developments such as new retail malls, sports complexes, etc., or transportation terminals) and would normally be included in modeling a metropolitan area's transportation network, including at minimum all principal arterial highways and all fixed guideway transit facilities that offer an alternative to regional highway travel."

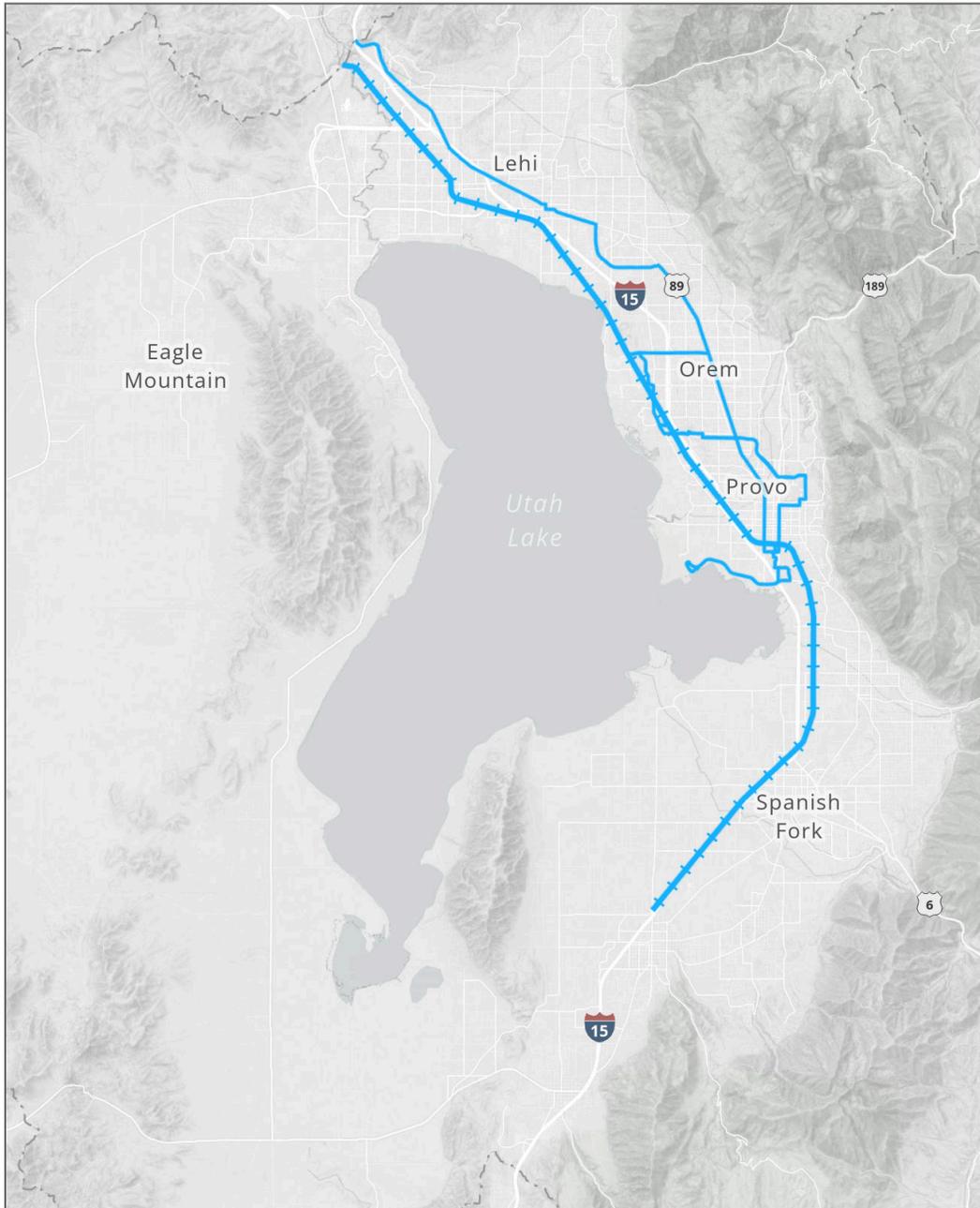
MAG's definition of highway networks meets the EPA's. The regional travel model includes all principal arterial and passenger rail projects. Also, projects on minor arterials, collectors, and local transit services are included—therefore, they are included in the emission analysis—even though they do not serve regional transportation needs as defined by the EPA.

For a complete list of the projects included in this conformity analysis, see

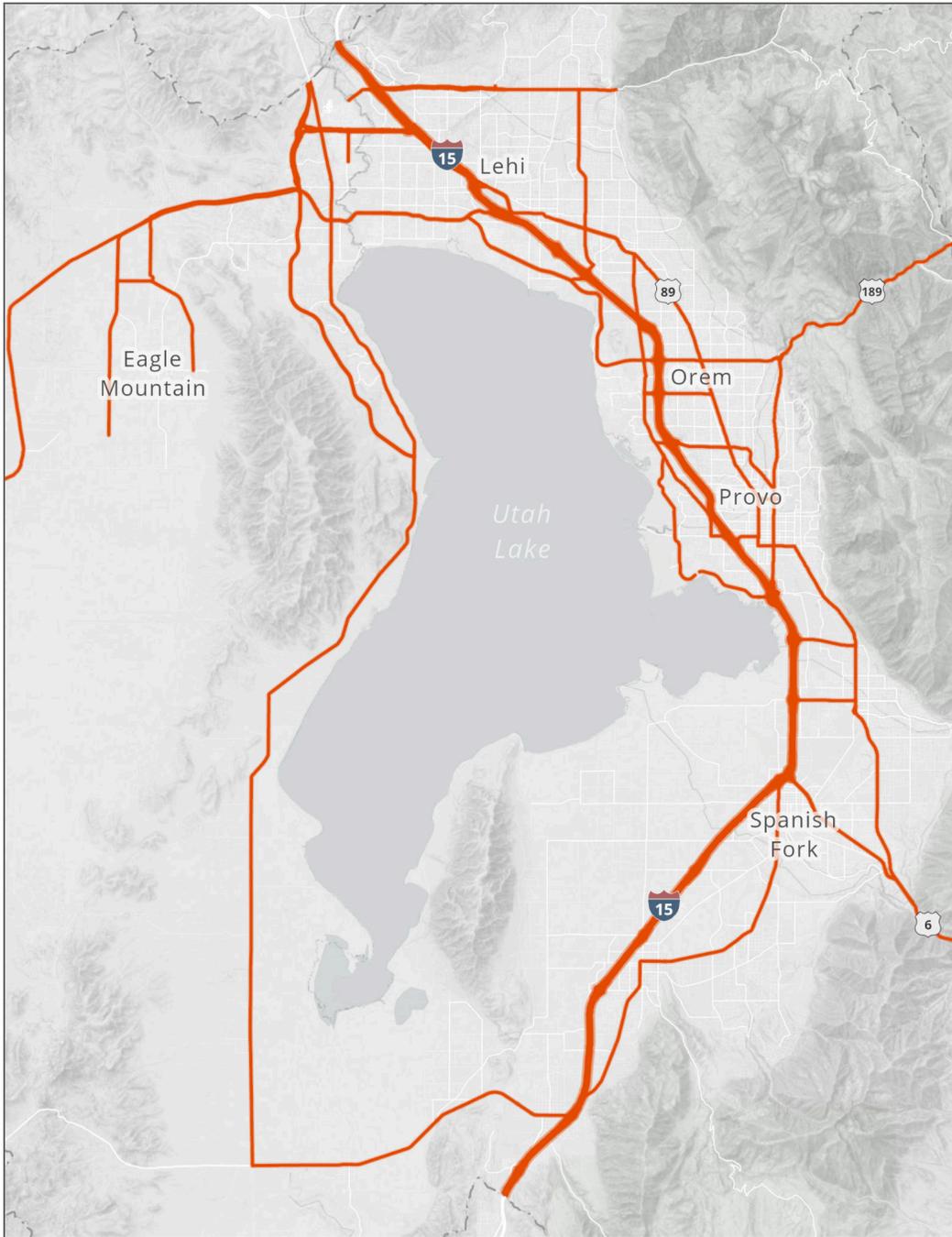
<https://magutah.gov/rtp2023/>.

Regionally significant projects may not proceed under a conformity lapse, but this conformity analysis finds that the transportation plan conforms.

### Utah County - Regionally Significant Corridors Transit Map



## Utah County - Regionally Significant Corridors Highway Map



### Future Years Travel Demand Model Network

All projects included in the TransPlan50, including baseline projects, were modeled to determine their impact on air quality. This approach models conformity for the entire plan, but in the case of failure to demonstrate conformity, only exempt projects may proceed.

To remain consistent with past modeling practices, MAG included the analysis of all planned transportation capacity increase projects on facilities functionally classified as Collector, Minor Arterial, and Principal Arterial streets.

The highway projects list from TransPlan50 and maps of the transportation networks used for the emissions analysis are included in the appendix. The following "Build" model runs reflect the Plan.

- Baseline* = Includes existing network as of 2019
- 2028 = Includes project on current TIP and existing
- 2032 = Includes projects up to and including year
- 2042 = Includes projects up to and including year
- 2050 = Includes projects up to and including year

In addition to the TransPlan50 networks mentioned above, additional years were interpolated – 2030, 2035, and 2040 to provide transportation data needed to assess the air quality impacts on the PM<sub>10</sub> Ozone and PM<sub>2.5</sub> analysis years.

**Concept and Scope:** The design concept and scope of all regionally significant capacity-increasing projects in the TIP have not changed significantly from those identified in the plan.

## The Regional Travel Demand Model

The Wasatch Front Regional Travel Demand Model (TDM) is an integrated land-use, transportation, and air quality model for various analyses. The MAG MPO and the Wasatch Front Regional Council share the model, covering all four Wasatch Front urban counties (Davis, Salt Lake, Utah, Weber). It includes several advanced features that place it on the cutting edge of improved modeling methods required to meet the BIL Act and the Clean Air Act. In addition, several features recommended by the Travel Model Improvement Program of the US-DOT, FHWA, FTA, and the EPA are incorporated into the model.

Some of the most useful model outputs include:

- Origin-Destination flows
- Directional link vehicle volumes
- Vehicular travel times and speeds
- Transit ridership numbers
- The model produces forecasts four times of day:
  - AM Peak: 6-8:59 AM
  - Midday: 9 AM – 2:59 PM
  - PM Peak: 3-5:59 PM

- Evening/Off-peak: 6 PM – 5:59 AM

### Model Coverage

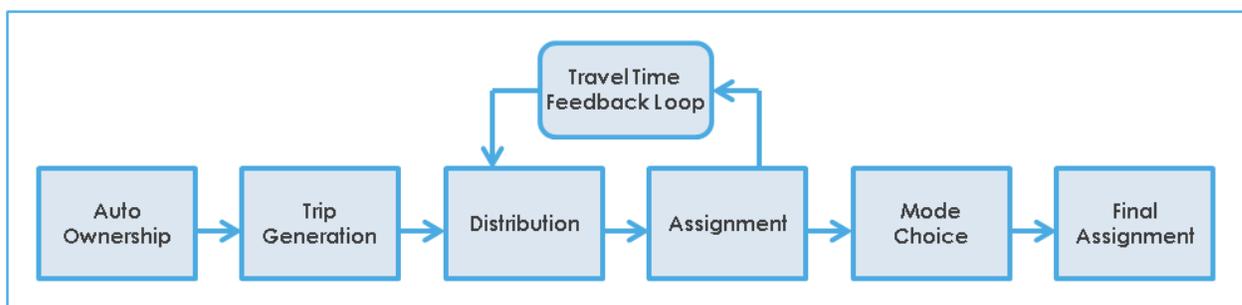
The model covers Utah, Salt Lake, Davis, western Weber, and a portion of Box Elder counties. Significant commuting is from Summit County (Park City) and Tooele County. In both cases, the population centers are separated by more than 15 miles from the urban portions of Salt Lake County. The issue of how to treat these growing travel flows may need to be dealt with in the future. Currently, the commuting levels are not of a magnitude that treating the flows as an external-internal flow compromises the urban models significantly.

### Model Structure

System-wide transportation planning models are typically based on a four-step modeling process: trip generation, trip distribution, mode split, and trip assignment. The regional model incorporates these steps and adds an auto ownership model sensitive to urban design variables.

The model has a feedback loop between trip distribution and traffic assignment, which ensures consistency between travel congestion and times that *influence* trip distribution patterns and are also an *outcome* of trip assignment. Travel time, or, more generally speaking, *accessibility*, is calculated based on outputs from the assignment model but is also an important determinant of trip distribution and mode split. Therefore, it is customary to iterate these three models to reach a convergent solution.

### Conceptual Overview Of The WFRC/MAG Model



At the start of a full model run, the auto ownership model estimates household auto ownership levels, and then the trip generation model uses land use data and auto ownership to calculate trip ends at the TAZ level. The distribution model pairs these trip ends into origins and destinations. In the mode split model, a mode of travel is selected for each trip. Vehicle trips are assigned to the highway network in the assignment model. The travel time feedback loop in the model is accomplished before mode choice by converting person trips to vehicle trips based on observed data.

## Model Components

Although considered a five-step process, as stated above, the model comprises several steps, and each step is programmed or scripted separately. These steps include, but are not limited to:

- *A land use allocation model (REMM)* allocates future land use (e.g., housing and jobs) based on accessibility, land availability (through physical constraints and zoning), and the location of existing land uses.
- *The auto ownership model* estimates the likelihood of each household in the region owning 0, 1, 2, or 3+ cars. Auto ownership is a function of the household's characteristics and where the household lives. Auto ownership and availability are strong predictors of trip-making and mode-choice behavior.
- *The trip generation model* calculates the number of person trips generated within each TAZ. The parameters are developed from the WFRC/MAG [2012 Household Travel Survey](#). The number of trips to and from a place is a function of the amount and types of land-use activity within the zone.
- *The trip distribution model* pairs the origins and destinations for each zone for each trip purpose. Trip generation estimates the number of trips to or from each TAZ, and trip distribution completes the trip by describing which trip origins are linked with which trip destinations. The result is a person trip matrix for each trip type. Trip distribution links trip-ends of the same type based primarily on the spatial separation of different land uses and observed sensitivities to trip length. One output of trip distribution is the person trip table for home-to-work that can be compared to the "Journey-to-Work" data provided by the Bureau of the Census.
- *The highway/transit skim builder* finds the best available travel path via each explicitly modeled travel mode. Several modes are explicitly modeled, including auto, transit modes (local bus, bus rapid transit, light rail, commuter rail), and non-motorized modes. Skims are reasonable approximations of the travel time and cost between all pairs of TAZs, and skims are described for each travel mode. The path-finding algorithms are calibrated based on observed travel paths and observed relationships between volumes and congested speeds.
- *The mode split model* calculates which mode people will likely take based on availability and mode-specific parameters (e.g., time, cost, transit frequency). It provides a breakdown of person trips by mode for captive riders (people without automobiles) and the total population. The mode split model is developed based on observed data on mode preferences and what those preferences imply about

sensitivities to mode attributes.

- *The vehicle assignment model* locates the “best” routes between each origin/destination pair and assigns the vehicle trips to the highway network. Important outputs of this module include the number of vehicles on each roadway segment by time period and turning movements at intersections. Several other pieces of data can be extracted, including operating speeds, travel times, VMT, VHT, and V/C on links and at intersections. In addition, one can configure the vehicle assignment to save all the vehicle trips that use a single link in either direction (select link analysis) or all the vehicle trips that originate or are destined for a zone (select zone analysis).
- *Transit assignment* uses the transit trip table output from mode split and assigns person trips using transit to the appropriate transit route. This provides a means of viewing transit ridership graphically and understanding the relative effectiveness of different transit network segments.
- *The model automatically* summarizes its output, including regional statistics (e.g., VMT, VHT, transit shares, and trip lengths), corridor and segment performance statistics (e.g., delay, volume, and ridership), district and county-level trip flows, MOVE emissions model inputs, and calibration statistics.

### **Traffic Analysis Zone Structure**

There are 1,316 TAZs in Utah County, summarizing travel between the TAZs, land use, and socioeconomic data.

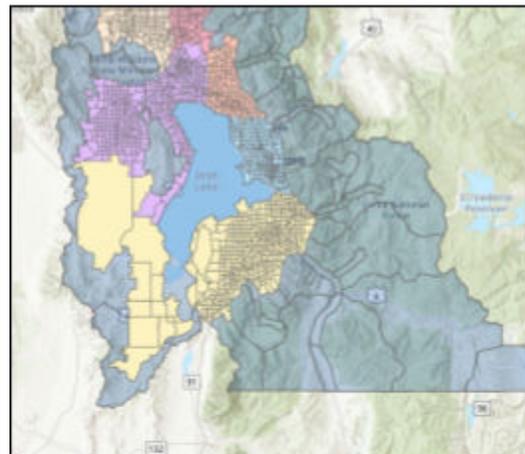
### **Network Structure**

The road network includes all facilities functionally designated as collectors or above for modeling purposes. It has approximately 50,000 road links.

### **Model Calibration**

The model is calibrated to reasonably represent 2019 “base year” travel conditions and patterns, a process in which model output is checked or “validated” against real-world data. Trip rates, transit ridership and highway volumes are examples of types of model outputs that are validated. When the model results do not match the base-year values within an acceptable tolerance, parameters are adjusted until the model is acceptable. For future forecast years, the model output is reviewed for “reasonableness” to validate model results, and model sensitivities can be assessed.

**MAG MPO Model Geography/TAZ Structure Map**



## Quality Control And Monitoring

Due to the vast amount of data required as input to the modeling process, numerous quality control tools have been developed to help ensure the integrity of that data, which in turn enhances the model's reliability. These automated features include the following:

- Summaries of key demographic data – these are used to compare magnitudes and trends and to check for accuracy.
- Summaries of county-to-county flow magnitudes and trends help check for accuracy and reasonableness.
- Cross-checks to detect conflicting network data.
- Visual inspection of differences between the highway networks.
- Screen line summaries to compare general traffic volumes.
- Check links for the correct county and city tag.
- Check that link speeds and volumes are within reasonable ranges.
- Numerous other network detail checks.

## Transportation Modeling

**Utah County 2019 AADT Adjustment Factors**

<b>Facility Type</b>	<b>Model AADT VMT</b>	<b>HPMS AADT VMT</b>	<b>TDM Model to AADT Factors</b>
<b>Freeways</b>	5,500,075	5,680,241	1.033
<b>Arterials</b>	6,550,962	5,875,649	0.897
<b>Local Roads</b>	863,796	2,390,541	2.767

AADT: Average Annual Daily Traffic | VMT: Vehicle Miles Traveled

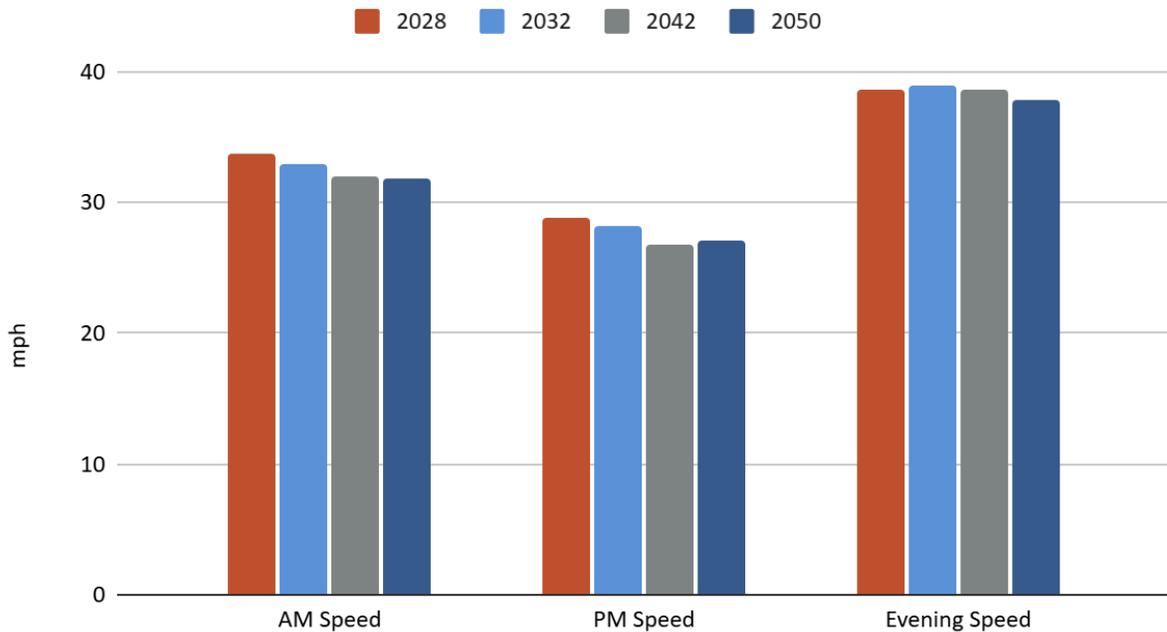
HPMS: Highway Performance Management System (UDOT traffic counts)

Each road segment in the TDM has an associated monthly adjustment factor. The default winter factor is 0.974, and summer is 1.07 for road segments without a factor.

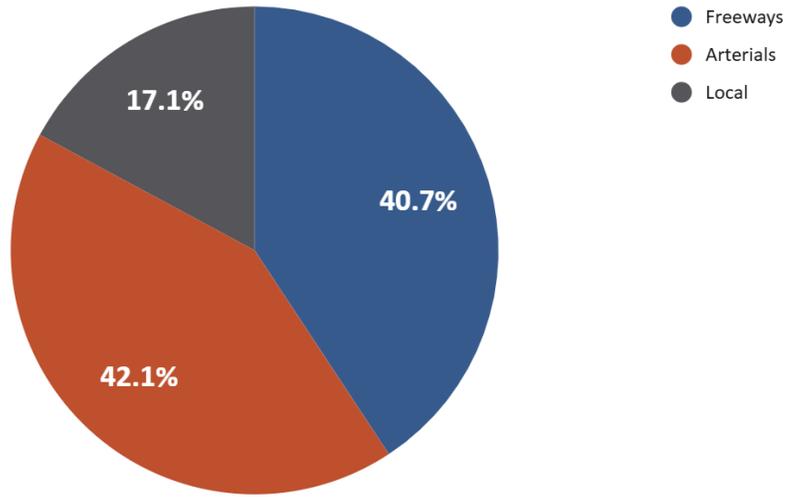
## Utah County Travel Characteristics

Average Speeds by Time of Day and Facility Type		2028	2032	2042	2050
Road Type					
Arterial	AM Speed	31.3	31.4	30.8	30.9
	PM Speed	28.3	27.1	26.1	26.5
	Evening Speed	34.9	35.0	34.8	34.7
Freeway	AM Speed	57.1	54.7	52.1	51.8
	PM Speed	45.2	44.6	41.3	42.0
	Evening Speed	68.1	68.8	68.3	66.1
Local	AM Speed	12.9	12.9	12.9	12.9
	PM Speed	12.9	12.9	12.9	12.9
	Evening Speed	12.9	12.9	12.9	12.9

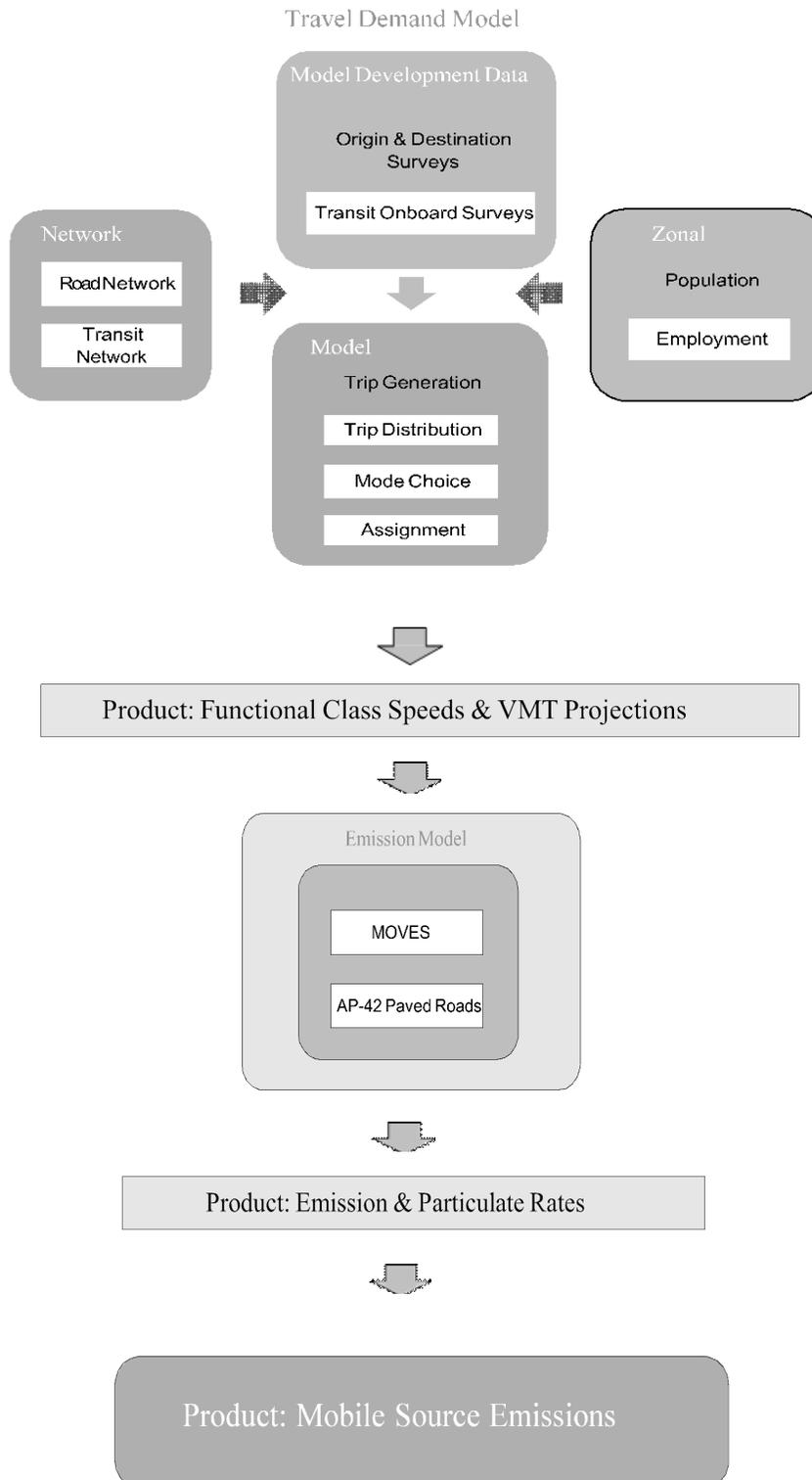
### Average Speeds



2019 Vehicle Miles Traveled by Road Type



## Travel Model and Mobile Emission Model Interaction Diagram



## **Modeling Domain For PM10 and Co Maintenance Areas, as well as PM2.5 and Ozone Non-Attainment Areas**

MAG's modeled area covers the entire county.

PM10, PM2.5, and ozone conformity must be found for all designated non-attainment areas. CO conformity must be found for the Provo City boundary, though only a qualitative analysis is required per the LMP.

## 93.111 - LATEST VEHICLE EMISSION MODEL

The Mobile Source emissions factor data is derived from employing two EPA models. For Oxides of Nitrogen emission factors and Particulates, MAG employed the approved MOVES 4.0.1 model. For determining Road Dust emission rates, the AP-42 equation was used as summarized below:

### **Secondary PM10 Pollutants**

MOVES - NO<sub>x</sub>  
AP-42- Chapter 13 - Road dust

### **PM10 Pollutants - Direct**

MOVES – Exhaust, Tire & Brake wear

### **2006 PM2.5 Precursor**

MOVES – NO<sub>x</sub>, VOC

### **2006 PM2.5 Pollutants - Direct**

MOVES Total PM2.5, Break and Tire Wear

### **2015 Ozone Precursor**

MOVES – NO<sub>x</sub>, VOC

Once the emission rates have been determined for each facility type, the corresponding rates (in grams/mile) are multiplied by the seasonal daily VMT for that facility for that calendar year. As per the following formula:

***Emission Rate (gram/mile) x Vehicle Miles Traveled (miles/day) = Emissions (gram/day)***

The total emissions for the County are determined by adding the rates of all 3 facility types (Freeways, Arterials, and Local roads)

### **Moves Air Quality Model**

The EPA-approved air quality model MOVES 4.0.1 was used to prepare the plan for conformity. Though MOVES5 was recently released, MAG is still within the grace period for using MOVES 4.0.1.

### **I/M Programs**

Until 1996, Utah County's I/M program was a basic two-speed idle, classified as a Test and Repair Program. In 1996 and later, the EPA approved Utah County's I/M Program for credit as a centralized test-only program with Technician Training credits.

Effective February 29, 2000, the Utah County I/M Program consists of a two-speed idle test on all gasoline vehicles of model years 1968 through 1995 and OBD testing on all gasoline vehicles of model year 1996 or newer. A vehicle that passes the OBD test will be given a certificate of compliance for registration purposes. If a vehicle fails the OBD test, it must pass the two-speed idle test to receive a certificate of compliance.

For modeling purposes, model years 1996 and above are tested under the OBD procedure. H.B.172 went into effect in January 2003, requiring biennial emission testing

on the newest six-year-old car models.

### **Moves Input Files**

The MOVES model is a data-intensive computer program based on the MYSQL database software. Input files utilized in the conformity analysis follow the agreed-upon procedures and data established through consultation with the DAQ and EPA to prepare SIPs and Maintenance Plans. The input files were adapted for the projection inventories to reflect changes in the local I/M programs, vehicle standards, and other parameters as they evolve – per the Interagency Consultation process that reflects the established local conditions. Vehicle activity input files are generated by the WFRC/MAG Regional Travel Demand Model.

The EPA User's Guide to MOVES found on the EPA's website, details MOVES procedures and proper use and explains all command lines and external files used in the modeling.

<b>Input File</b>	<b>Source</b>
Vehicle Population	DAQ
Age Distribution	DAQ
Inspection Programs	DAQ
Fuel Formulation & Usage	DAQ
Meteorology	State SIPs or DAQ/EPA
Vehicle Miles Traveled	TDM
Road Type Distribution	TDM
Speeds	TDM

### **Primary Particulate Emissions – Moves, and AP-42 Chapter 13 - Paved Roads**

The conformity analysis for Particulate Matter 10 (PM10) was estimated using the MOVES model for Exhaust, Tire, and Brake Wear. Road Dust was estimated using AP-42.

The MOVES guidance documentation and Chapter 13 of the fifth edition of AP-42 provide detailed discussions of the methodology.

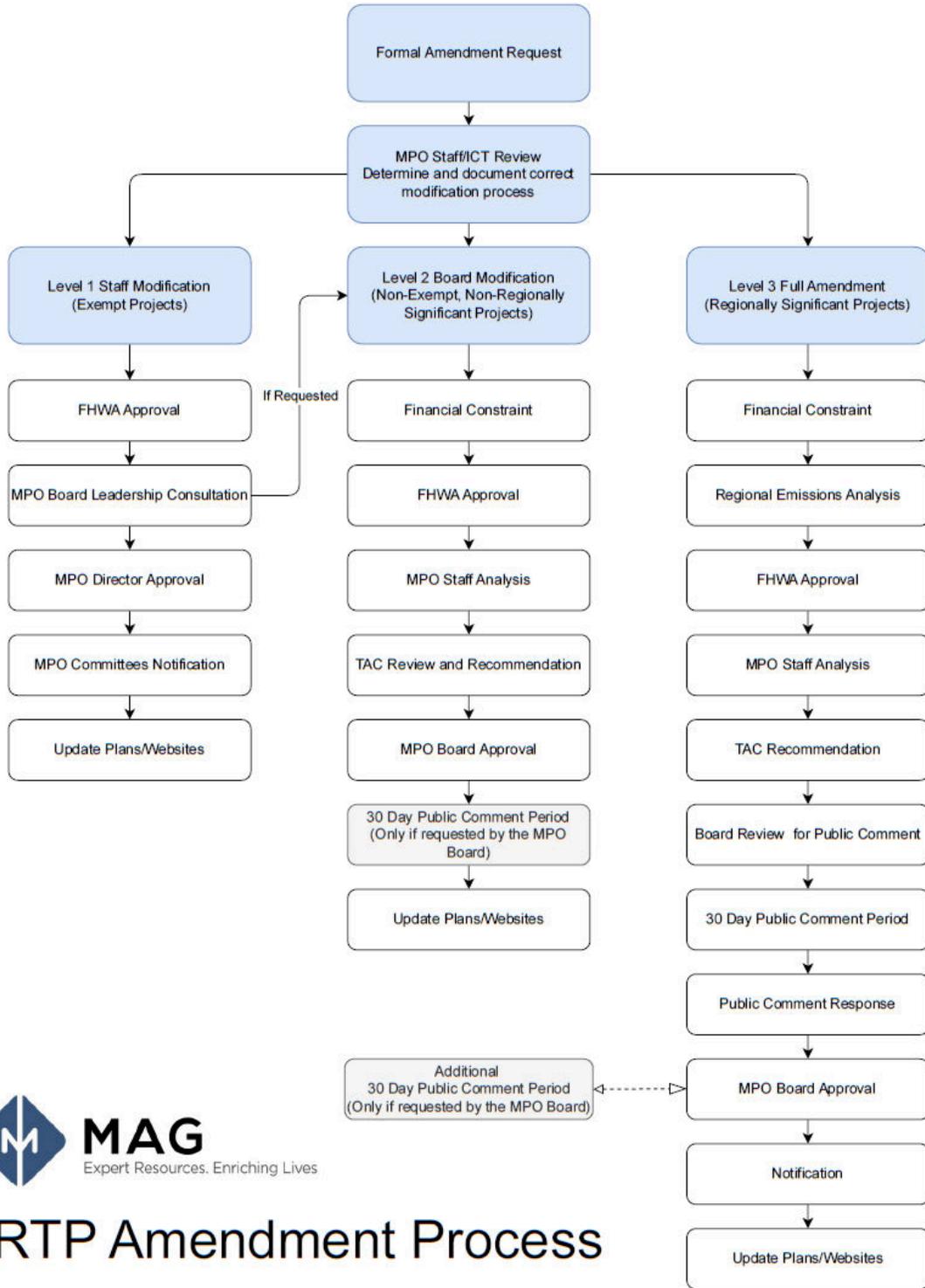
More information can be found at

<https://www.epa.gov/air-emissions-factors-and-quantification/ap-42-compilation-air-emissions-factors>.



# 93.112 - CONSULTATION

RTP Amendment process adopted in June 2024.



## RTP Amendment Process

Each modification to the RTP must follow one of three procedures:

Level 1, Staff Modifications, requires MAG MPO Director approval in coordination with FHWA and the Interagency Consultation Team (ITC).

Level 2, Board Modifications for Non-Regionally Significant Projects, requires MPO Board approval, a conformity determination from FHWA, and review by the ITC, city planners, elected officials, the TAC, a possible 30-day public comment period.

Level 3, Full Amendment for Regionally Significant Projects, requires MPO Board approval, a new air quality conformity finding, a new regional emission analysis, and review by the ITC, city planners, elected officials, the TAC, and a 30-day public comment period.

**WFRC / MAG Regional Transportation Model:** MAG, in collaboration with WFRC, employs a travel demand model using the traditional four-step travel demand process. The model is run using the Voyager program developed by Bentley Systems.

**DAQ / MAG Emission Input Parameters:** MAG, in collaboration with the DAQ has developed, through consultation, the environmental conditions (such as ambient temperature profile, altitude, and humidity) used in the MOVES model. These parameters were employed in the preparation of the State Maintenance Plans. A detailed discussion of the environmental conditions and parameters is included in the plan Technical Support Documents (TSDs) found in the SIPs.

**Clean Air Agencies Consultation:** As stated in the transportation bill, "In metropolitan areas which are non-attainment for ozone or carbon monoxide under the Clean Air Act, the metropolitan planning organization shall coordinate the development of a long-range plan with the process for the development of the transportation control measures of the State Implementation plans required by the Clean Air Act." A Consultation Procedures SIP was adopted by the State AQ Board and Approved by EPA in September 2009.

The presence of the DAQ on our MAG MPO Board and the MPO Technical Advisory Committee contributes to improved communications between Air Quality and Transportation Planning activities. In conjunction with the conformity determination, we have established an Interagency Coordination Committee that includes FHWA, UDOT, DAQ, UTA, EPA, MAG, and WFRC representatives. These meetings have greatly improved the consultation process, resulting in a successful plan consistent with federal planning regulations and the SIP.

Employing the Interagency Consultation process articulated in 40 CFR 93.105, MAG has

worked closely with the appropriate agencies to develop a process that established a set of transportation, land use, and air quality planning assumptions used in this conformity determination. The participants included staff representing the following agencies:

UDOT  
FHWA/FTA  
DAQ  
EPA/Region 8  
CMPO

UTA  
Utah County Government  
Utah County Cities  
WFRC

MAG presented Amendment 3 to the ICT on August 13, 2025. Any significant comments received will be included in the final version of this document.

## 93.113 - TRANSPORTATION CONTROL MEASURES

The PM10 SIP for Utah County and the Provo CO Maintenance Plan do not identify mandatory Transportation Control Measures (TCM).

***Transit Improvements:*** The TransPlan50 identifies strategic options for the role of public transit in Utah County. This plan identifies mass transit needs and intercity travel between Utah County and the Salt Lake Valley with a thirty-year horizon.

UTA is funded through portions of the sales tax for operation and capital expenses. Additional revenue is received through fares paid and federal grants received annually for capital expenses. While there have been some short-term fluctuations in transit patronage in response to fare increases or pandemics, the implementation of commuter rail service and other transit improvements have increased transit patronage within the levels anticipated by the Plan.

Plans for expanding and increasing commuter rail service, extending Bus Rapid Transit to American Fork, and adding commuter rail in South Utah County are moving forward. These transit goals are featured in the Plan, and the steps necessary to achieve them are moving forward, including a proposal for voter approval of additional revenue for transit funding. A detailed discussion of public transit is included in the TransPlan50 document.

## 93.118 - EMISSION BUDGETS

### Utah County PM10 Conformity Determination

The Utah County PM10 Maintenance Plan requires conformity determinations for NOx and Primary PM (a combination of Direct PM10 and Dust). Construction-related PM<sub>10</sub> (§93.122(d)) is unnecessary because the PM10 SIP does not identify construction-related dust as contributing to the PM<sub>10</sub> non-attainment.

In 2005, the State introduced a Trading Rule for Salt Lake County (R307 – 110) that allows the WFRC MPO to apply a potential surplus in its budget for Primary PM<sub>10</sub> to a potential shortfall in its budget for NOx at a one-to-one ratio.

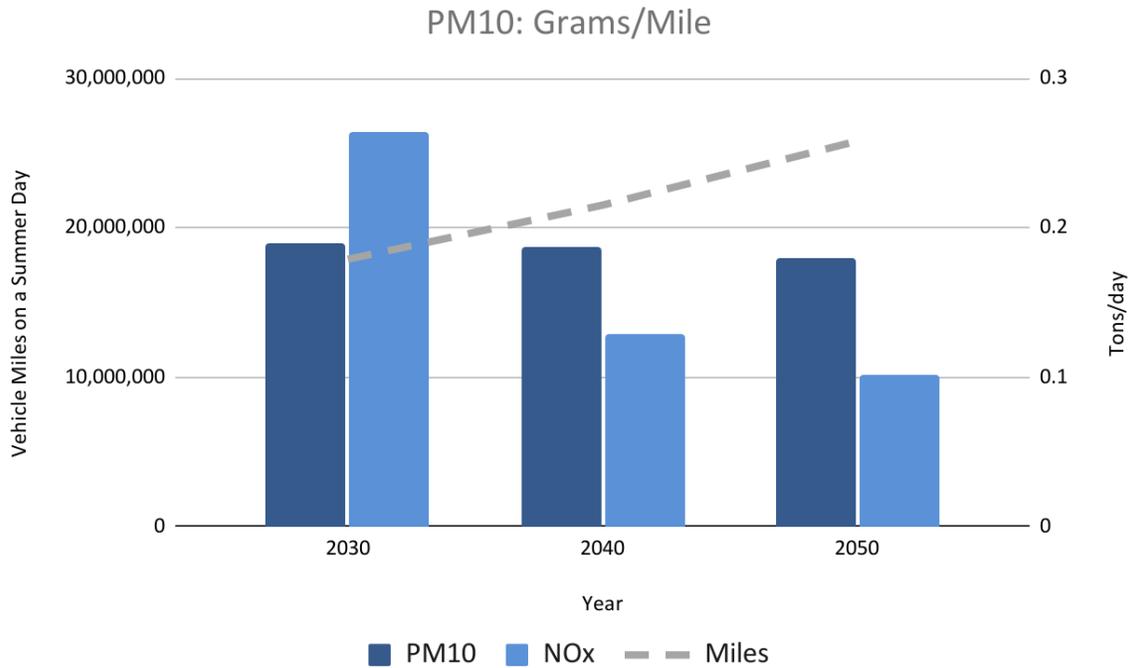
MAG also requested that the state expand this existing rule to Utah County. The new Rule addressing Utah County, R307 – 111, was incorporated into the state code and became effective March 5, 2015. The final Trading Rule for Utah County was published in the Federal Register on July 17, 2015.

In 2020, PM10 was redesigned to attainment with a Motor Vehicle Emissions Budget for 2030.

### Utah County PM10 Emission Modeling Results

The following tables summarize the emissions from MOVES and EPA’s Dust Calculation tool (AP-42 -Paved Roads).

Emissions Rates grams/mile			
Year	2030	2040	2050
Miles	17,898,904	21,519,276	25,809,862
PM10	0.190	0.187	0.180
NOx	0.264	0.129	0.102
Dust	0.138	0.138	0.133
PM10-Exhaust	0.009	0.004	0.004
PM10-Brakewear	0.033	0.035	0.033
PM10-Tirewear	0.010	0.011	0.010
*PM10 = Dust + Direct PM10 (Exhaust+Brakewear+Tirewear)			

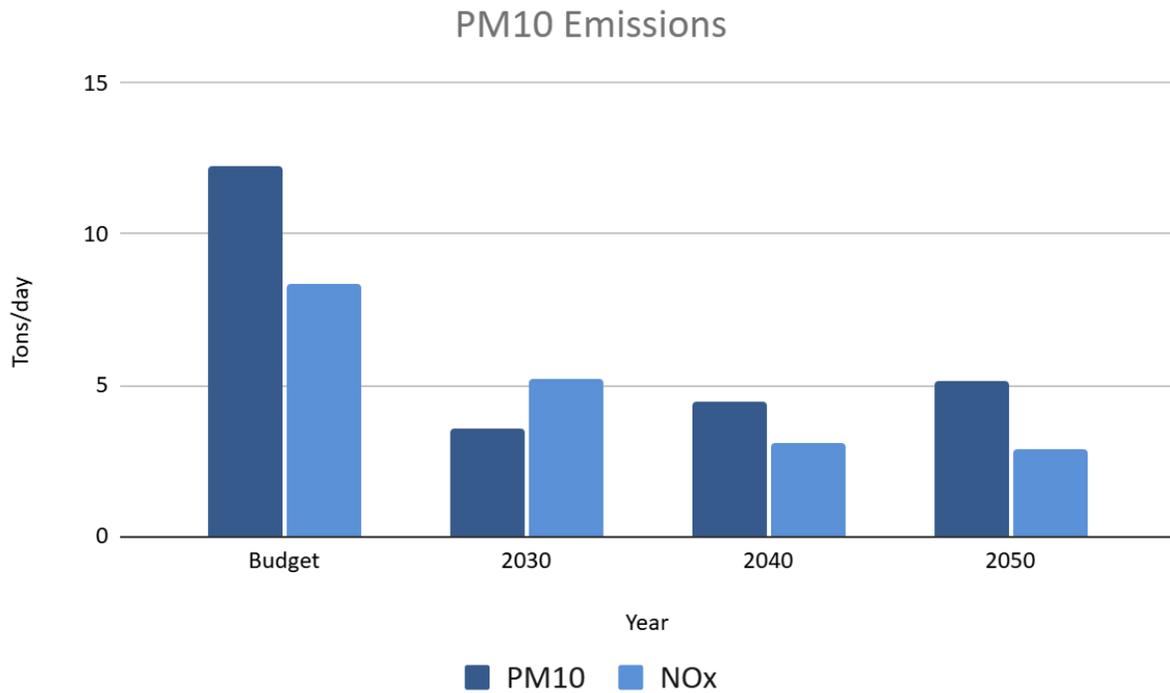


The table below summarizes the budget test associated with each required analysis year for the precursor pollutant NOx and Direct PM10. Direct PM10 is the sum of various component elements related to small particulates resulting from vehicle travel. These include exhaust, brake, tire wear, and fugitive dust, as the EPA AP-42, chapter 13—Paved Roads model results. TransPlan50 and the TIP conform to the emissions budget test for all PM10 pollutants.

### Utah County PM10 Conformity Budget Test

PM10 Budget Conformity Test				
Emissions from all road types and on-road vehicles in tons/winter day				
Pollutant	Budget	2030	2040	2050
PM10*	12.28	3.581	4.442	5.108
NOx Precursor	8.34	5.21	3.07	2.9
Dust		2.561	3.272	3.778
PM10-Exhaust		0.17	0.1	0.1
PM10-Brakewear		0.65	0.82	0.94
PM10-Tirewear		0.2	0.25	0.29
<b>Result</b>		<b>Pass</b>	<b>Pass</b>	<b>Pass</b>

\*PM10 = Dust + Direct PM10 (Exhaust+Brakewear+Tirewear)



**Utah County PM10 Final Conformity Determination**

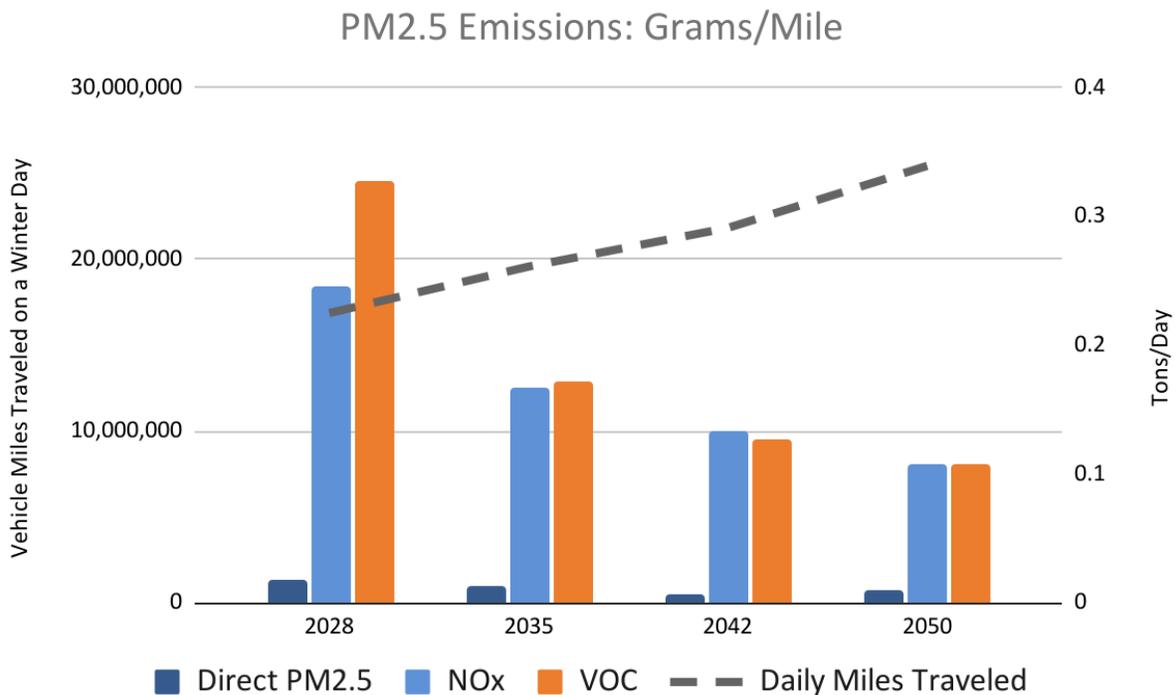
Based on this report's findings, a positive conformity determination for PM10 is made for the TransPlan50 and TIP.

## Utah County PM2.5 Conformity Determination

A conformity determination for PM2.5 is required for NOx, direct PM2.5, and VOC.

PM2.5 Grams/Mile				
For all on-road vehicles on all roads in the PM2.5 maintenance area				
year	2028	2035	2042	2050
Miles	16,878,944	19,584,528	21,840,884	25,454,286
Direct PM2.5*	0.0177	0.0123	0.0073	0.0098
VOC	0.2451	0.1678	0.133	0.1072
NOx	0.3273	0.1715	0.1269	0.1069
PM2.5 - Exhaust	0.0118	0.0068	0.0012	0.0042
PM2.5 - Brakewear	0.0043	0.0041	0.0045	0.0042
PM2.5 - Tirewear	0.0016	0.0014	0.0016	0.0014

\*Direct PM2.5 = Exhaust + Brakewear + Tirewear



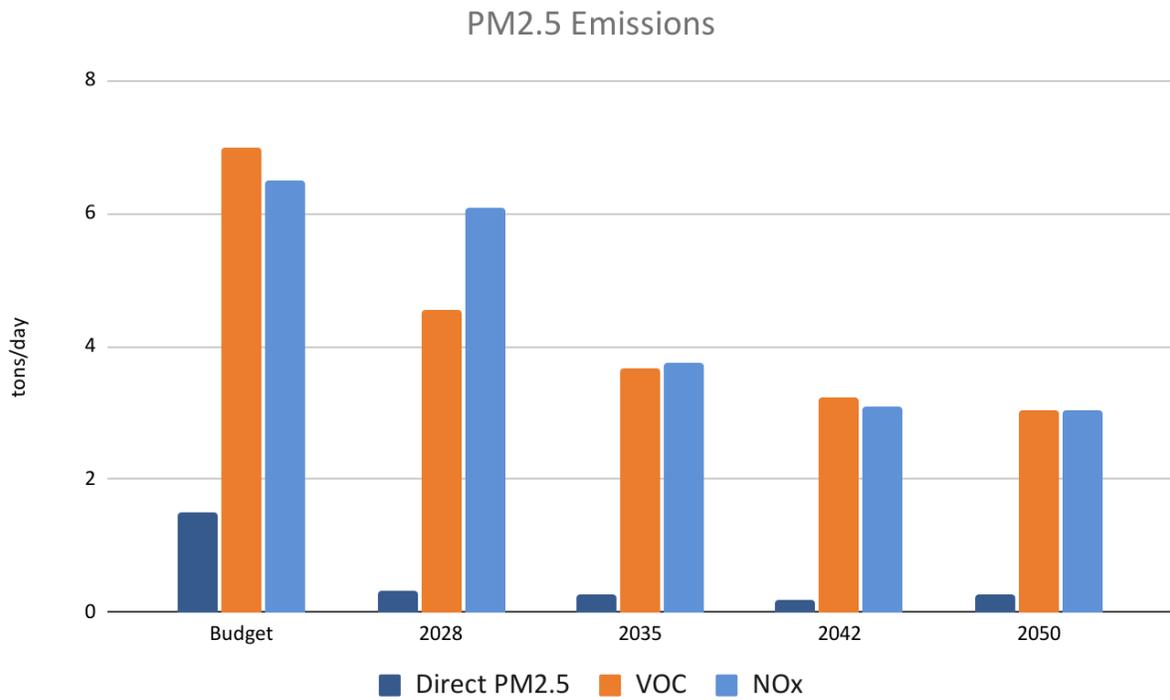
The tables below summarize the test results associated with each required analysis year for PM2.5 emissions for the precursor pollutant of NOx and Direct PM2.5. The

EPA's Motor Vehicle Emissions Budgets are applicable.

<b>SIP Maintenance Budget</b>	
<b>Pollutant</b>	<b>Tons per Day</b>
<b>Direct PM2.5</b>	1.5
<b>NOx</b>	6.5
<b>VOC</b>	7.0

<b>PM2.5 Emissions</b>						
<b>For all on-road vehicles on all roads in the PM2.5 maintenance area</b>						
<b>Pollutant</b>	<b>Budget</b>	<b>2028</b>	<b>2035</b>	<b>2042</b>	<b>2050</b>	
Direct PM2.5	1.5	0.33	0.26	0.18	0.28	
VOC	7	4.56	3.67	3.24	3.03	
NOx	6.5	6.09	3.76	3.1	3.04	
Primary Exhaust PM2.5 - Total		0.22	0.15	0.03	0.12	
Primary PM2.5 - Brakewear Particulate		0.08	0.09	0.11	0.12	
Primary PM2.5 - Tirewear Particulate		0.03	0.03	0.04	0.04	
<b>Result</b>		<b>Pass</b>	<b>Pass</b>	<b>Pass</b>	<b>Pass</b>	

\*Direct PM2.5 = Exhaust + Brakewear + Tirewear



TransPlan50 and the TIP conform to PM2.5 Budget.

### Utah County PM2.5 Final Conformity Determination

Based on the findings of this report, a positive conformity determination for PM2.5 is made for the TransPlan50 Plan and TIP.

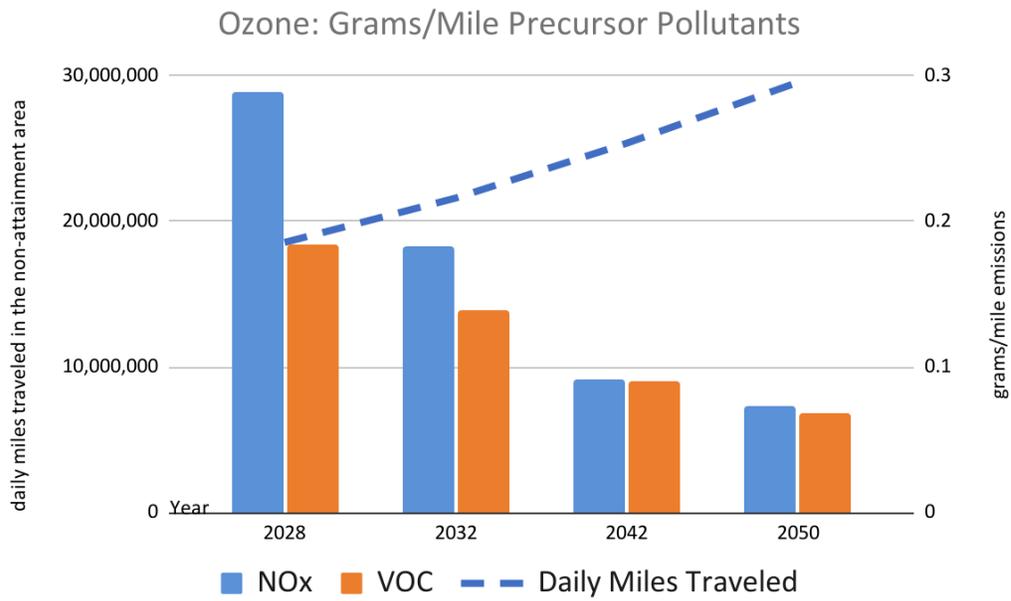
## Utah County Ozone Conformity Determination

The Southern Wasatch Front Area, namely Utah County, was designated as a marginal non-attainment area for ozone by EPA effective December 2018. Utah County achieved the standard by the 2021 attainment date and is working with the State to submit a Limited Maintenance Plan (LMP), under which a qualitative conformity analysis is acceptable. Until the EPA approves the LMP, conformity requires an analysis of TransPlan50 projects based on an interim test comparing the plan analysis years to the Ozone Inventory of 2017 (as the base year). The analysis year inventories should be  $\leq$  (less or equal) to the base year. Since ozone exceedances in Utah County were observed in the summer, the VMTs have been adjusted to reflect that season. The TDM analysis excludes areas of Utah County outside the Ozone Non-Attainment Area.

Conformity determinations are required for NO<sub>x</sub> and VOC, Ozone’s precursor pollutants.

### Utah County Ozone Emission Modeling Results

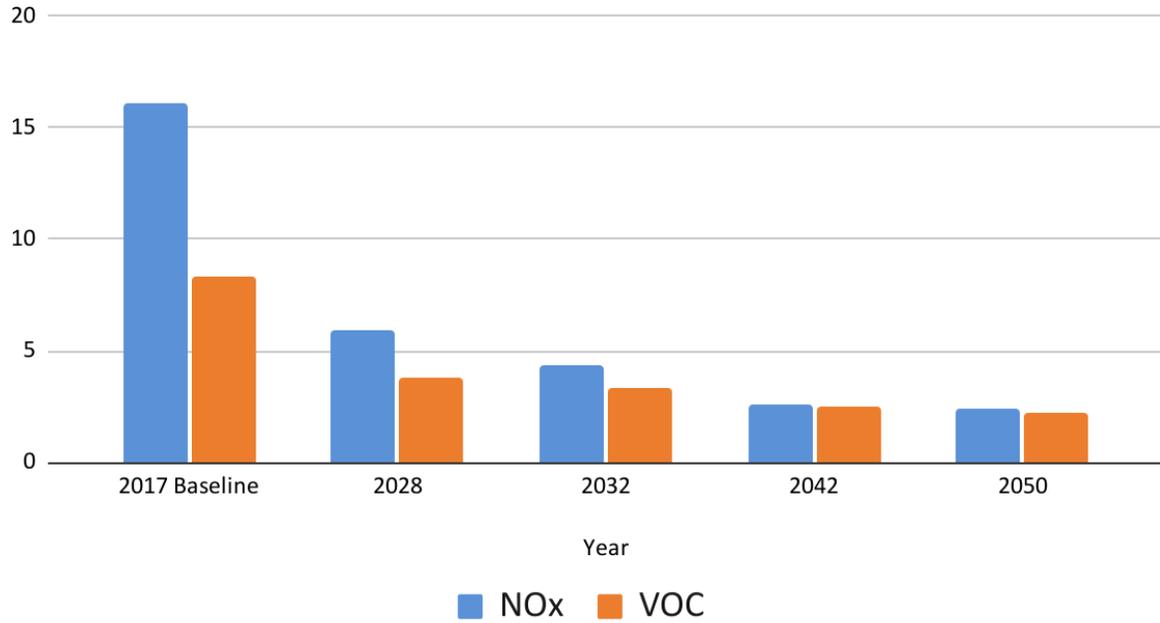
<b>Ozone: Grams/Mile Precursor Pollutants</b>				
<b>For all on-road vehicles on all roads in the ozone non-attainment area</b>				
Miles	18,559,548	21,609,424	25,381,842	29,562,848
Pollutant	2028	2032	2042	2050
NO <sub>x</sub>	0.2884	0.1835	0.0919	0.0733
VOC	0.1843	0.1385	0.0904	0.0681



The following table summarizes the interim test results (analysis year ≤ 2017) associated with each required analysis year for OZONE emissions for the precursor pollutants NOx and VOC.

<b>Ozone: Daily Tons of Emissions</b>					
<i>Pollutant</i>	2017 Baseline	2028	2032	2042	2050
NOx	16.11	5.9	4.37	2.57	2.39
VOC	8.31	3.77	3.3	2.53	2.22
Result		<b>Pass</b>	<b>Pass</b>	<b>Pass</b>	<b>Pass</b>

## Ozone: Daily Tons of Emissions



### Utah County Ozone Final Conformity Determination

Based on the findings of this report, a positive conformity determination for OZONE is made for the TransPlan50 Plan and TIP.

## **Provo City CO Conformity Determination**

Effective July 13, 2020, Provo City entered its 2<sup>nd</sup> 10-year Carbon Monoxide maintenance plan. This plan follows the provisions/requirements of the CO LMP Policy. The CO LMP does not require a regional emissions test for a conformity determination. According to the EPA, "... it is unreasonable to expect that an LMP area will experience so much growth in that period that a violation of the CO NAAQS would result. Therefore, for the Provo CO maintenance area, all actions that require conformity determinations for CO under our conformity rule provisions are considered to have already satisfied the regional emissions analysis and "budget test" requirements in 40 CFR 93.118."

Based on our analysis, a qualitative conformity determination for Provo City for carbon monoxide can be made based on the LMP Provisions described under the transportation conformity rule.

## **Provo City Co Final Conformity Determination**

Based on an analysis consistent with these rules, a positive determination can be made for the TransPlan50 and TIP in the Provo City Carbon Monoxide maintenance area.

## **Additional Information**

2024-2050 Highway Project List See <https://magutah.gov/rtp/>

2024 TransPlan50 Amendment website <https://magutah.gov/rtp-amendments/>

The MOVES models' input and output database files used in the analysis can be obtained upon request from MAG: 801.229.3800 or [smecham@mountainland.org](mailto:smecham@mountainland.org).

## **Appendix A: Public Comment Posting**

Public notice was posted on the [magutah.gov website](https://magutah.gov), the [State of Utah Public Notice website](#), in the MAG office, and on the MAG social media accounts on Facebook and LinkedIn.

### **Website and Social Media Public Comment Writeup**

Mountainland Association of Governments (MAG) invites the public to provide feedback on the draft of Amendment #3 to the 2023-2050 Regional Transportation Plan (RTP), also known as TransPlan50, and the Air Quality Conformity Report draft.

What is the Regional Transportation Plan?

The Regional Transportation Plan (RTP) is the regional long-term strategy for our Region's future transportation system from now to 2050. MAG develops the plan with transportation partners, local communities, organizations, stakeholders, and residents.

What is the Public Comment Period For?

Every four years, MAG prepares and adopts an RTP. MAG adopted the current TransPlan50 in June 2023. While the RTP receives considerable review before being formally adopted, circumstances may warrant a change after its initial adoption, including funding availability, changing local and state needs, the outcomes of environmental analyses and other planning studies, or updated timelines on the development of projects.

Amendment #3 includes changes to several roadway and active transportation projects developed in consultation with transportation partners and local communities throughout Utah County. Notable changes include the future Cory Wride Freeway, Cedar Valley Highway alignment, and Highline Canal Trail.

The public comment period for the Amendment #3 projects runs from October 13, 2025, to November 13, 2025. Changes to RTP projects and the Air Quality Conformity Report are available for review and comment here: <https://magutah.gov/rtp-amendment-3/> on October 13, 2025.

If you would like to give your comments or ask questions, you can do so by:

- Mail: PEP Comments, Attn. Kendall Willardson, 586 East 800 North, Orem, UT 84097
- Email: [kwillardson@mountainland.org](mailto:kwillardson@mountainland.org)
- Website: [www.magutah.gov/public](http://www.magutah.gov/public)
- Phone: 801-229-3800

### **Comments and Action**

Comments received and actions taken will be listed here after the comment period has ended.



**M A G**

Expert Resources. Enriching Lives.

The MAG MPO TransPlan50 Amendment 3 is prepared by the MAG Metropolitan Planning Organization (MPO) as part of the Mountainland Association of Governments (MAG)

[www.magutah.gov](http://www.magutah.gov)

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Orem, UT 84097

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