**Metropolitan Transportation Commission**

# MTC Planning Committee

**March 13, 2026** **Agenda Item 8b**

## MTC Resolution No. 4748. Transportation-Air Quality Conformity Analysis for Plan Bay Area 2050+ and the Amended 2025 Transportation Improvement Program

**Subject:**

Request referral of MTC Resolution No. 4748. Transportation-Air Quality Conformity Analysis for Plan Bay Area 2050+ and the Amended 2025 Transportation Improvement Program to the Commission for approval.

**Background:**

Federal regulations under the Clean Air Act require Metropolitan Planning Organizations to demonstrate that their long-range transportation plans and short-range transportation funding programs will not worsen air quality or interfere with attainment or maintenance of the National Ambient Air Quality Standards (NAAQS). This requirement, known as transportation conformity, applies to Plan Bay Area 2050+ (the "plan") and the Amended 2025 Transportation Improvement Program (the "TIP").

In the Bay Area, transportation conformity applies to pollutants for which the region does not meet federal air quality standards—specifically ground-level ozone and fine particulate matter ($PM_{2.5}$). Conformity is demonstrated by showing that emissions from implementation of the plan and TIP are consistent with the region's federally approved air quality plan, known as the State Implementation Plan (SIP), prior to approval.

MTC conducted a transportation conformity analysis for the plan and TIP in accordance with U.S. Environmental Protection Agency (EPA) transportation conformity regulations and the EPA-approved Bay Area transportation conformity SIP, as implemented through the Bay Area Air Quality Conformity Protocol (MTC Resolution No. 3757). The analysis used the latest planning assumptions and EPA-approved models to estimate future travel activity and motor vehicle emissions.

Regional travel forecasts were developed in spring 2025 using MTC's Travel Model (Version 1.6.1), and emissions were estimated in fall 2025 using the California Air Resources Board's EMission FACtor model (EMFAC2021 version 1.0.2) with EPA-approved CARB adjustment factors. Ozone conformity was evaluated using the emissions budget test based on the 2001 Ozone Attainment Plan, and $PM_{2.5}$ conformity was evaluated using the baseline interim emissions test, which compares projected emissions to 2008 baseline levels.

Development of the conformity analysis was informed by ongoing interagency consultation with the Air Quality Conformity Task Force, which includes representatives from the U.S. EPA, Federal Highway Administration, Federal Transit Administration, Caltrans, and the Bay Area Air District. The Task Force reviewed the analysis methodology, assumptions, and draft findings during meetings held in October and December 2025.

The draft conformity analysis was released for a 30-day public review and comment period from December 22, 2025, through January 21, 2026, and was made available online. MTC received five comment letters during the public comment period. One comment addressed the scope and documentation of the conformity analysis, while the remaining comments raised broader policy or planning issues outside the scope of the federal transportation conformity process. The Task Force reviewed public comments in January 2026 and reviewed the final conformity analysis in February 2026. All Task Force meetings were conducted remotely and were open to the public.

**Findings**

Based on the transportation conformity analysis, interagency consultation, and public review process, MTC finds that implementation of Plan Bay Area 2050+ and the Amended 2025 TIP meets all applicable federal transportation conformity requirements. The analysis demonstrates that the plan and TIP will not cause new air quality violations, worsen existing violations, or delay attainment of the NAAQs.

Accordingly, the following transportation conformity findings are made for the plan and the Amended 2025 TIP:

(A) Conforms to the applicable provisions of the SIP and the applicable transportation conformity budgets in the SIP approved for the national 8-hour ozone standard and to the interim conformity emissions test for the national fine particulate matter standard; and

(B) Provides for the timely implementation of transportation control measures (TCMs) pursuant to the applicable SIP.

**Recommendation:**

Staff requests that the MTC Planning Committee find Plan Bay Area 2050+ and the Amended 2025 TIP to be in conformance with the applicable federal air quality plan for ground-level ozone and fine particulate matter (PM2.5) and refer MTC Resolution No. 4748 to the Commission for approval.

**Issues:**

None identified.

**Attachments:**

- MTC Resolution No. 4748
  - Attachment A

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