Air Quality Conformity User's Guide

MEMPHIS URBAN AREA MPO – August 2025

Memphis MPO
METROPOLITAN PLANNING ORGANIZATION

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Strengthening Regional Transportation

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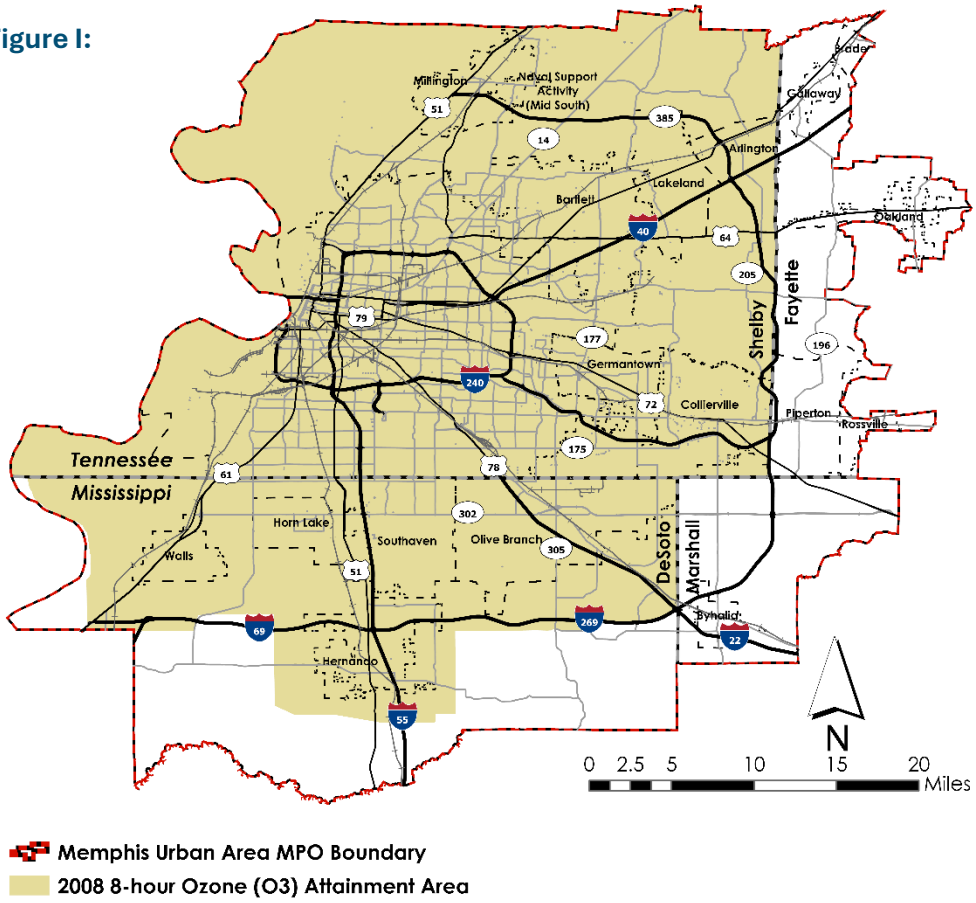
Air Quality Conformity User's Guide

Section I: Purpose

This document is intended to serve as a tool for assisting the Memphis Urban Area Metropolitan Planning Organization (MPO) Interagency Consultation Committee (IAC) members in the air quality conformity process. As shown in **Figure I**, The Memphis, TN-MS-AR area is a designated maintenance area for the 2008 8-hour Ozone National Ambient Air Quality Standards (NAAQS), which includes Shelby County, Tennessee, northern portion of DeSoto County, Mississippi (as shown below), and Crittenden County, Arkansas. The Memphis MPO is required to demonstrate conformity for the Tennessee and Mississippi portion of the maintenance area and Interagency Consultation requirements are outlined in 40 CFR 93.105. For the Memphis MPO maintenance area, transportation conformity requirements for the 2008 8-hour ozone standard, extend through 2036, which is the ending year of the 2nd 10-year maintenance plan. The Memphis MPO will be required to perform conformity analysis through this period, unless there is a redesignation of the region or other change, impacting the end date.

Figure I:



The NAAQS are a federal standard which establish an air quality concentration to protect the public's health. The Memphis, TN-MS, AR area is required to demonstrate conformity for the criteria pollutant, Ozone.

The Air Quality Conformity User's Guide was developed in consultation with the Memphis MPO's IAC members. The guide is intended to aid in the consistency and continuity of the air quality conformity process and will be updated as applicable with changing rules and regulations, in consultation with the IAC.

Section II: IAC Structure

The Interagency Consultation Committee is a standing advisory committee for the Memphis MPO which is established as per 40 CFR 93.105. The IAC advises on local, state, or federal air quality standards and the impacts on transportation planning matters. Additionally, the IAC reviews plans and amendments to the plans including air quality conformity reports and other related items to maintain compliance with Federal regulations related to air quality. The IAC consists of representatives from various regional, State, and Federal agencies responsible for air quality control programs, local representatives from the Memphis MPO's Engineering and Technical Committee (ETC), and the West Memphis MPO.

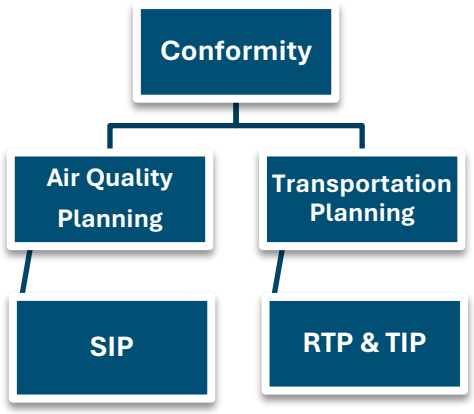
IAC Representatives:

- Environmental Protection Agency (EPA) – Region IV
- Federal Highway Administration (FHWA) – Tennessee Division
- Federal Highway Administration (FHWA) – Mississippi Division
- Federal Transit Administration (FTA) – Region IV
- Tennessee Department of Environment and Conservation (TDEC) – Air Pollution Control Division
- Mississippi Department of Environmental Quality (MDEQ)
- Arkansas Department of Energy and Environment (ADEQ)
- Tennessee Department of Transportation (TDOT)
- Mississippi Department of Transportation (MDOT)
- Arkansas Department of Transportation (ARDOT)
- Shelby County Health Department (SCHD)
- West Memphis Metropolitan Planning Organization (WMPO)
- Memphis MPO ETC Local Jurisdictions and Member Agency Representatives

Interagency consultation is the central coordinating mechanism for public agency involvement in the air quality conformity process.

Section III Background and History

Figure II: Link between Air Quality & Transportation Planning



Resource: *FHWA*

The 1990 Clean Air Act Amendments (CAAAs) and the Tennessee and Mississippi Transportation Conformity Rules require Regional Transportation Plans, Transportation Improvement Programs (TIP), and transportation projects to conform to the purpose of the State Implementation Plan (SIP) in Tennessee and Mississippi (**Figure II**). Conformity to a SIP means that federal funds will not be spent on projects that cause or contribute to any new violations of the NAAQS; increase the frequency or severity of NAAQS violations; or delay timely attainment of the NAAQS or any required interim milestone. The Transportation Equity Act for the 21st Century (TEA-21) and its successor legislations, the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU), Moving Ahead for Progress in

the 21st Century Act (MAP-21), the Fixing America's Surface Transportation Act (FAST Act), and the Bipartisan Infrastructure Law (BIL) reinforce the need for coordinated transportation and air quality planning through the metropolitan planning provisions. **Table I** provides a timeline of the Ozone Designation history for the Memphis region. Attainment for Carbon Monoxide (CO) NAAQS was reached on December 27, 2016 and transportation conformity requirements are no longer required for CO.

Table I: Ozone (O_3) Designation History

Effective Date	Designation/Redesignation	Federal Register	Publication Date
January 6, 1992	Shelby County: Marginal Non-Attainment 1-hour ozone standard	56 FR 56694	November 6, 1991
February 16, 1995	Shelby County: Attainment 1-hour ozone standard	60 FR 3352	January 17, 1995
June 15, 2004	Memphis, TN-AR: 1997 8-hour ozone moderate non-attainment area[1]	69 FR 23858	April 30, 2004
November 22, 2004	Memphis, TN-AR: 1997 8-hour ozone marginal non-attainment area	EPA Final Rule	September 22, 2004
February 3, 2010	Memphis, TN-AR: Attainment 1997 8-hour ozone standard[2]	75 FR 56	January 4, 2010
July 20, 2012	Memphis, TN-MS-AR: 2008 8-hour ozone marginal non-attainment area[3]	77 FR 30088	May 21, 2012
May 9, 2016	DeSoto County portion redesignated from non-attainment to attainment for 2008 8-hour ozone standard	81 FR 20543	April 8, 2016
July 25, 2016	Shelby County portion redesignated from non-attainment to attainment for 2008 8-hour ozone standard	81 FR 40816	June 23, 2016
May 25, 2016	Crittenden County portion redesignated from non-attainment to attainment for 2008 8-hour ozone standard	81 FR 24030	April 25, 2016
January 16, 2018	Shelby County, TN, DeSoto County, MS, and Crittenden County, AR were designated as Attainment/Unclassifiable for the 2015 8-hour ozone standard[4]	82 FR 54232	November 16, 2017

Notes:

[1]8-hour standard superseded the 1-hour standard to address the impacts of exposure to ozone for longer periods of time. Included: Shelby County, TN & Crittenden County, AR.
[2]10-Year Maintenance Plan was established (2021 was the last year).
[3]Included: Shelby County, TN, portion of DeSoto County, MS (in MPO boundary at the time of designation), and Crittenden County, AR (West Memphis MPO)
[4]Demonstration of conformity is not required for the 2015 8-hour ozone NAAQS

In 2023, the Shelby County Health Department (SCHD), the Mississippi Department of Environmental Quality (MDEQ), and the Arkansas Department of Energy and Environment (ADEQ), volunteered to participate in EPA's Ozone Advance Program. The Ozone Advance Program is a collaborative effort to improve public health and ensure areas currently attaining the ozone NAAQS continue to take steps to improve the local air quality. In an effort to ensure that healthy ozone levels are maintained, the SCHD, MDEQ, ADEQ, and other stakeholders are continuing to work with EPA through the Ozone Advance Program.

Air Quality Modeling:

EPA's Motor Vehicle Emission Stimulator (MOVES) is an emission modeling system that estimates emissions for mobile sources for criteria pollutants, greenhouse gases, and air toxics. EPA released the original version of the MOVES model platform in 2010, which updated its predecessor, MOBILE6. For the Memphis MPO region the MOVES model is used to model emissions for the ground-level ozone precursors: Volatile Organic Compounds (VOC) and Oxide of Nitrogen (NOx). Since the original release of the MOVES model, updates have been made to the MOVES modeling platform as shown in **Table II** below. As noted within the table, for significant changes to the model and major new releases, EPA provides a two-year grace period before the latest version of the model is required to be used for regional conformity analysis. Following an announcement for model updates, the Memphis MPO reviews the changes to the model and how the changes may impact modeled emissions. The Memphis MPO shares this information with the IAC and ensures the use of the latest model in advance of the two-year conformity grace period.

Table II: Air Quality Model History

Model Version	Release Date	2-Year Grace Period Ending Date	MPO Use of the Model Update
MOBILE6	Predecessor to the updated MOVES model platform.		
MOVES2010	March 2010	March 2013[1]	February 2012
MOVES2014	October 2014	October 2016	January 2016
MOVES2014a	November 2015	N/A	August 2017
MOVES2014b	August 2018	N/A	September 2019
MOVES3.0	January 2021	January 2023	August 2021
MOVES3.1	November 2022	N/A	February 2023
MOVES4.0	September 2023	September 2025	N/A
MOVES5.0	November 2024	November 2026	September 2025

Notes:

[1]The two-year grace period was extended by 1-year for the use of the MOVES model for regional conformity analyses.

Section IV: Rules & Regulations

Following are the rules and regulations that guide the air quality transportation conformity process, and a brief description of what is contained in each. For the full description, please see the appropriate CFR and/or document(s).

Rules and Regulations:

- Clean Air Act Section 176(c) (42 U.S.C. 7506(c))
    - **"Limitations on Certain Federal Assistance"** - Transportation conformity is required by the Clean Air Act to ensure that federally funded projects are consistent with the air quality goals established in the State Implementation Plans (SIP). For the Memphis MPO this includes the Tennessee and Mississippi SIPs.

- United States Code of Federal Regulations, Title 40 Part 93 (40 CFR 93)
    - **"Determining Conformity of Federal Actions to State or Federal Implementation Plans"** – This rule contains related requirements to implement the Clean Air Act, conformity determination requirements, interagency consultation procedures, and other applicability.

- United States Code of Federal Regulations, Title 40 Part 51(40 CFR 51)
    - **"Requirements for Preparation, Adoption, and Submittal of Implementation Plans"** – This rule contains air emission reporting requirements and other procedural requirements. For the Memphis MPO, Motor Vehicle Emissions Budgets (MVEB) are established for the ozone precursors, Nitrogen Oxides (NOx) and Volatile Organic Compounds (VOC).

- United States Code of Federal Regulations, Title 23 Part 450 (23 CFR 450)
    - **"Planning Assistance and Standards"** – Included within this rule are requirements for metropolitan transportation planning and programming, which includes the development and content included in the RTP and TIP and the air quality conformity requirements related to the MPOs planning documents.

- Tennessee Transportation Conformity Rules, Chapter 1200-03-34
    - **"Transportation Conformity Interagency Consultation and General Provisions"** and **"Conformity of General Federal Actions"** – The Tennessee Transportation Conformity Rules include state regulations and define interagency consultation procedures, public participation process, and other procedures for conformity to the Tennessee SIP, for the Shelby County portion of the Memphis MPO.

- Mississippi Transportation Conformity Rules
    - Similar to noted above, conformity determinations for the DeSoto County portion of the Memphis MPO must be performed according to state regulations, prescribed in Mississippi.

Section V: IAC Consultation

In non-attainment and maintenance areas, a transportation conformity analysis is conducted to estimate the effects of transportation projects and plans on air quality. These analyses determine if the plan(s) can be implemented without increasing the severity/frequency of violations of any applicable NAAQS. The IAC process brings together the air quality partners during the development of the MPO's applicable plans, programs, and associated conformity determinations. Additional reviews may be requested to ensure compliance with Federal regulations related to air quality.

Plans and Programs for IAC Review and/or Coordination:

- Regional Transportation Plan (RTP)
    - New Planning Document
    - Project List
    - Amendment Request
- Transportation Improvement Program (TIP)
    - New Programming Document
    - Project List
    - Amendment Request
- Associated Air Quality Conformity Reports (RTP & TIP)
- Pre-Analysis Consensus Memorandum
- Consultation on updates to the Motor Vehicle Emissions Simulator (MOVES) Model and air quality issues in the region

- Updates on data or plans (i.e. travel, air quality, etc.)

Additional information on the IAC consultation process can be found in **Section VII**.

Section VI: Terminology and Definitions

Following are key terminology and definitions to assist the IAC, with pertinent information related to the Transportation Conformity process.

Air Quality Conformity Determination:

An air quality conformity determination shows that the total emissions projected for the Memphis MPO's Regional Transportation Plan (RTP) and the Transportation Improvement Program (TIP) are within the on-road mobile source emissions limits or budgets established within the SIP. An air quality conformity determination is made for each respective state since Tennessee and Mississippi have separate budgets. In the instances where there are multiple RTP and/or TIP amendments impacting the model, one air quality conformity report for each state is developed. After the model is run, any changes to the amendments (ie: adding a project, removing a project, change in project scope, etc), would require a new model run and an updated report. Please note that air quality conformity analysis is conducted for the entire plan and is not a project-level analysis. Further information on the Memphis MPO's RTP and TIP can be found in **Section VII** below.

Conformity determinations, for the RTP and TIP, are made by FHWA and FTA, in coordination with EPA and must be made at a minimum:

- Every 4-years
    - Note: For the Memphis MPO this occurs on a more frequent basis (ie: development of each new/updated RTP and TIP, and non-exempt plan amendments)
- 24-months after new/updated SIP MVEB's are found adequate or approved
- 12-months after new nonattainment designations become effective

If a conformity determination is not made within the minimum requirements, a one-year grace period is given before there is a lapse and the use of federal funds is restricted. During the one-year grace period only exempt projects, as defined below, and projects or phases that are already authorized can proceed. To all possible extents, the Memphis MPO develops RTP and TIP timelines, coordinates with the State of Tennessee and State of Mississippi regarding any updates to the SIP and consults with the IAC and state and federal partners to ensure that all requirements are met.

Exempt Projects:

In evaluating the emissions impact of transportation activities in the conformity process, regulations exempt certain projects included in a RTP or TIP from conformity analysis. This decision is based on the assumption that these projects do not directly impact transportation-related air emissions or that they may not be able to be precisely analyzed. Exempt projects found in 40 CFR 93.126 and 93.127 are listed in the **Table III** below. Additional information on Regionally Significant Projects is included below.

Table III: Exempt Projects

Exempt Projects – 40 CFR 93.126	
Safety	
Railroad/highway crossing	Railroad/highway crossing warning devices
Projects that correct, improve, or eliminate a hazardous location or feature[1&2]	Traffic control devices and operating assistance other than signalization projects
Safer non-Federal aid system roads	Pavement marking demonstration
Shoulder improvements	Fencing
Increasing sight distance	Skid treatments
Highway Safety Improvement Program implementation[2]	Safety roadside rest areas
Guardrails, median barriers, crash cushions	Adding medians
Pavement resurfacing and/or rehabilitation	Truck climbing lanes outside the urbanized area
Emergency relief (23 U.S.C. 125)	Widening narrow pavements or reconstructing bridges (no additional travel lanes)
Lighting improvements	Emergency truck pullovers
Mass Transit	
Operating assistance to transit agencies	Purchase of support vehicles
Rehabilitation of transit vehicles	Construction of small passenger shelters and information kiosks
Purchase of office, shop, and operating equipment for existing facilities	Purchase of operating equipment for vehicles (e.g., radios, fare boxes, lifts, etc.)
Construction or renovation of power, signal, and communications systems	Reconstruction or renovation of transit buildings and structures (e.g., rail or bus buildings, storage and maintenance facilities, stations, terminals, and ancillary structures)
Rehabilitation or reconstruction of track structures, track, and track bed in existing rights-of-way	Purchase of new buses and rail cars to replace existing vehicles or for minor expansions of the fleet
Construction of new bus or rail storage/maintenance facilities categorically excluded in 23 CFR part 771	
Air Quality	
Continuation of ridesharing and van-pooling promotion activities at current levels	Bicycle and pedestrian facilities
Other specific activities which do not involve or lead directly to construction	
Planning and technical studies	Grants for training and research programs
Planning activities conducted pursuant to titles 23 and 49 U.S.C.	Federal aid systems revisions
Engineering to assess social, economic, and environmental effects of the proposed action or alternatives to that action	Emergency or hardship advance land acquisitions (23 CFR 710.503)
Acquisition of scenic easements	Noise attenuation
Plantings, landscaping, etc.	Sign removal
Transportation enhancement activities (except rehabilitation and operation of historic transportation buildings, structures, or facilities)	Repair of damage caused by natural disasters, civil unrest, or terrorist acts, except projects involving substantial functional, locational or capacity changes
Directional and informational signs	
Exempt Projects – 40 CFR 93.127	
Intersection channelization projects	Intersection signalization projects at individual intersections
Interchange reconfiguration projects	Changes in vertical or horizontal alignments
Truck size and weight inspection stations	Bus terminals and transfer points

Notes:
To ensure national consistency in how transportation conformity requirements are implemented, EPA, in consultation with FHWA, provided clarifications on its interpretations of several exempt project types below:

[1] **Auxiliary Lanes** – If an auxiliary lane is less than 1 mile in length, it can be considered under the item: "Projects that correct, improve, or eliminate a hazardous location or facility."

[1] **Ramp Metering** – Are exempt under the item: "Projects that correct, improve, or eliminate a hazardous location or facility."

[2] **Road Diets** – If a road diet is part of a state's Highway Safety Improvement Program, the road diet is exempt under the item: "Highway Safety Improvement Program implementation." If not, a road diet could still be exempt under the item "Projects that correct, improve, or eliminate a hazardous location or facility."

Project Groupings:

The Memphis MPO's RTP and TIP utilizes groupings for some of these exempt project types. The use of project groupings is permitted under 23 CFR 450.326(h) for projects that are not considered to be of appropriate scale for individual identification. Projects included within the groupings, must be non-regionally significant, environmentally neutral, and exempt from air quality conformity. Example groupings in the RTP and/or TIP include Resurfacing/Roadway Operation and Maintenance, Pedestrian and Bicycle, Signalization/ITS, Bridge, Transportation Plans and Studies, Air Quality and Emissions Reduction, and Safety projects. New groupings may be added if they meet the requirements as defined under 23 CFR 450,326(h).

Regionally Significant Projects:

Regionally significant projects are defined as transportation projects (other than exempt projects), that are on a facility that serves regional transportation needs (such as access to and from the area outside the region; major activity centers in the region; major planned developments such as new retail malls, sports complexes, or employment centers; or transportation terminals) and would normally be included in the modeling of the metropolitan area's transportation network. At a minimum, this includes all principal arterial highways and all fixed guideway transit facilities that offer a significant alternative to regional highway travel as defined under 23 CFR 450.104.

Prior to each RTP and TIP update, the IAC will review the list of projects, as outlined in **Table IV**. The project list will include, at a minimum, all Regionally Significant Projects. The following criteria will help to assist the Memphis MPO's IAC consultation process with determining whether a transportation project is Regionally Significant with respect to air quality conformity, which are not explicitly identified in the federal regulations. It is important to mention, that the Memphis MPO' s Travel Demand Model network includes all principal arterial roadways and above as well as some lower functionally classified roadways to ensure that the model performs correctly. Inclusion in the model is not a sole indicator of regionally significant roadways.

Regionally Significant Project Screening Criteria:

Examples of Projects that are Regionally Significant, by definition:

- Interstates and Freeways or Expressways
- Principal Arterials
- Fixed Guideway Transit Facilities

Regionally Significant Screening Criteria, to assist with other projects that are not explicitly defined:

- Is the project on a roadway functionally classified as a Principal Arterial or higher and non-exempt from air quality conformity analysis?
    - If yes, this is an example of a Regionally Significant project by definition and the other criteria would not apply.

- Does the roadway provide a direct connection between two roadways classified as Principal Arterial or higher?
    - If yes, in most cases, these types of projects can be defined as Regionally Significant.

- Can the project be modeled in the Memphis MPO's Travel Demand Model?
    - If no, in most cases, these types of projects, are not considered to be Regionally Significant. Example projects can be found in **Table III** above.
    - As noted above, inclusion in the model is not a sole indicator of regionally significant roadways.

- Is the project on a facility, that provides a connection to "major activity centers"?
    - If yes, these types of projects, are considered to be Regionally Significant. For the Memphis MPO region, examples of major activity centers include:
        - Major airport
        - Regional intermodal facilities
        - Major regional retail centers and malls
        - Major hospitals and regional medical centers
        - Major colleges and universities
        - Tourist destinations
        - Major regional sports complexes and arenas

- Does the project provide significant vehicular capacity?
    - If yes, in most cases, these types of projects can be defined as Regionally Significant.

- Does the project provide additional through traffic lanes and/or a new roadway segment greater than 1-mile in length?
    - If yes, in most cases, these types of projects can be defined as Regionally Significant.

Please note, the Regionally Significant Project Screening Criteria are intended to serve as a guide. For projects that are not clearly defined, the IAC will review regional significance on a case-by-case project basis through the IAC consultation process, as needed.

Transportation Control Measures:

Transportation Control Measures (TCMs) are the steps taken to reduce vehicle emissions and improve air quality by reducing or changing the flow of traffic. TCMs identified in an applicable SIP as enforceable measures are required to be implemented and are relied on for a reduction in vehicle emissions. TCMs can be implemented voluntarily even though they are not identified in a SIP as an enforceable measure. Currently, there are no enforceable control measures identified in the Tennessee or Mississippi SIPs.

Section VII: IAC Consultation Process

Regional Transportation Plan (RTP) and Transportation Improvement Program (TIP)

The following section documents the IAC consultation process for the development of new and/or updates to the Memphis MPO's Regional Transportation Plan (RTP) and the Transportation Improvement Program (TIP) and amendments to the RTP and TIP.

Figure III:

RTP & TIP New Plan/Program:

The Memphis MPO's RTP is updated every 4 years and the TIP is updated every 3 years. **Figure III** provides a snapshot of the timeline for the development of new RTP and TIP documents. The Moving Together 2050 RTP was adopted in August 2023 and the upcoming RTP update is planned for adoption by July 2027. The FY 2023-26 TIP was adopted in September 2022 and the next TIP update covering FY 2026-29 is planned for adoption by September 2025.

Table IV outlines the key IAC review milestones for new RTP and TIP development. As noted in the table, the initial step is the distribution of the schedule to IAC with the key milestones and review periods. IAC will be notified of any updates to the schedule throughout the plan/program development. Additionally, IAC calls will be scheduled as needed during the associated review periods.

Table IV: IAC Review of New RTP & TIP documents

IAC Review – New Plan/Program: RTP, TIP, and associated Conformity Reports		
Key Milestones	**Plan/Program**	**Review Period**
IAC Review Schedule Distributed	RTP & TIP	N/A (updated as needed and shared with IAC)
Pre-Analysis Consensus Memorandum[1]	RTP & TIP	14-day (if updated/changed)
Project List[2]	RTP & TIP	14-day
Draft Document & associated Air Quality Conformity Reports[3]	RTP & TIP	30-day

Notes:

[1] The Pre-Analysis Consensus Memorandum details the assumptions and procedures used in preparation of the air quality conformity analysis.

[2] The Project List and Pre-Analysis Consensus Memorandum may be shared together within one IAC review period.

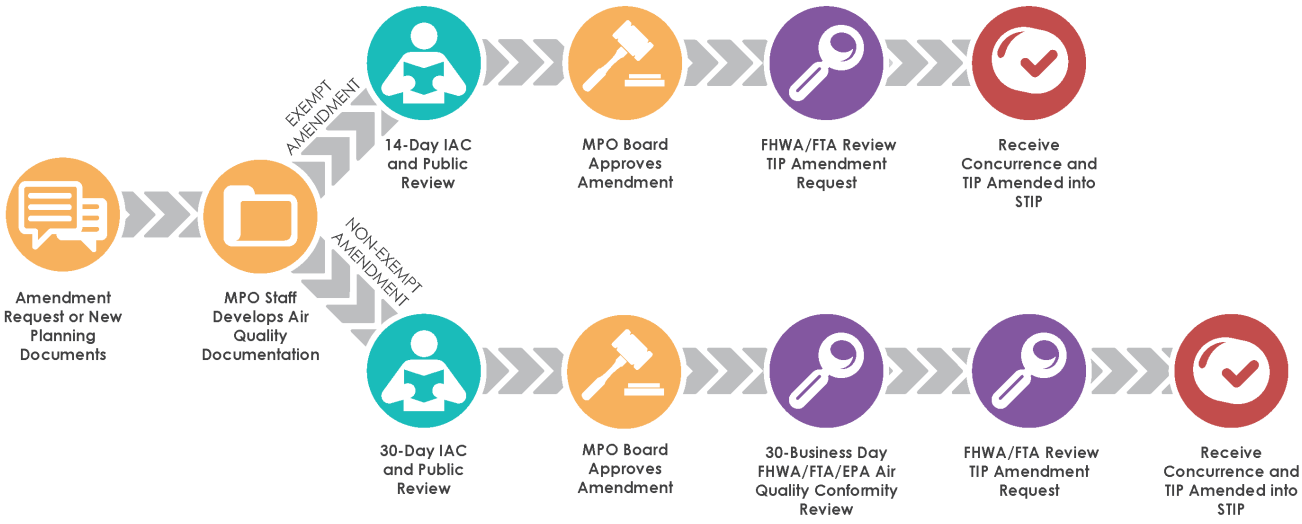
[3] Separate CDRs are developed for TN and MS since each respective state has their own established budgets.

Project List: As part of the development of the RTP and TIP, the IAC will review the list of projects to be included in each plan. The IAC's review of the project list will include information such as the project name, termini, description, project length, Conformity Status (Exempt/Non-Exempt), Regional Significance, as discussed in the section above, and if the project can be modeled. For the TIP, the project list is taken to the MPO's Transportation Policy Board (TPB) for approval, following the IAC and public review. Once the IAC has concurred on the project list, MPO staff will begin the development of the associated conformity documentation.

RTP & TIP Changes (Amendments vs Administrative Modifications):

Amendment: An amendment is a revision that involves major changes to a project or the overall program, and must meet the requirements regarding transportation conformity, re-demonstration of fiscal constraint, and public review and comment. Project sponsors notify MPO staff of requested changes to the RTP or the TIP. Once a request is received, MPO staff in consultation with appropriate agencies, as needed, will review the requested change to make an initial determination, regarding the revision falling under the category of an amendment of an administrative modification. If the revision falls under the category of an amendment, the air quality conformity process may take up to 180 days depending on the project or program and scope of the associated review, as shown in **Figure V,** and included in the Memphis MPO's 2024 Public Participation Plan (PPP) Appendix.

Figure V:



Notes:

For **Exempt Amendments** - Following the MPO Board approval, MPO staff will prepare the STIP amendment packet, and send to TDOT and/or MDOT to forward to FHWA/FTA for the STIP amendment approval. The STIP amendment packet will include the TIP amendment pages, signed MPO Board resolution, signed Metropolitan Transportation Planning Process Certification, meeting and conformity review documentation, and any IAC or public comments received.

For **Non-Exempt Amendments** - Following the MPO Board approval, MPO staff will prepare the Air Quality Conformity packet and send to TDOT (along with state and local air agency) and/or MDOT to forward to FHWA/FTA for approval of the conformity documents. FHWA will forward the documents to EPA for review. The Air Quality Conformity Packet will include the signed MPO Board resolution(s), RTP and/or TIP amendment pages, air quality conformity documentation including any IAC or public comments received, meeting and conformity review documentation, and the appropriate Transportation Conformity checklist. Once the conformity determination approval is received MPO staff will prepare the STIP amendment packet, which will also include the final conformity determination letter, signed Metropolitan Transportation Planning Process Certification, and applicable TIP amendments, and send to TDOT and/or MDOT to forward to FHWA/FTA for the STIP amendment approval.

In addition to the IAC review, public review and comment periods are held, in accordance with the SIP and the PPP. The TIP amendment schedule, as noted in **Table V**, allows for the IAC and public review periods to be held independently, but in instances where a concurrent IAC and public review is needed, IAC will be consulted. IAC correspondence will be conducted via email and virtual meetings and calls will be scheduled, as needed. Public review materials will be made available on the MPO's website, in the MPO office by appointment during regular business hours, and at public meetings or events.

Administrative Modification: An administrative modification is a minor change from the approved RTP or TIP and does not require public review and comment, re-demonstration of fiscal constraint, or a conformity determination. Examples of changes that would be considered administrative modifications include a minor change to the total project cost, a minor change to the project description that does not impact air quality conformity, corrections to fix minor discrepancies, and changes to Project Groupings, as defined in the section above. Additional examples and information are included in the Memorandum of Agreement (MOA) Regarding the Definition and Need for Amendments/Administrative Modifications to the Statewide TIP (STIP) and TIP in TN and MS, and documentation in the RTP. Administrative modifications are processed by MPO staff and sent to TDOT and MDOT for inclusion in the STIP, shared with FHWA/FTA, and uploaded to the MPO's website.

If additional clarification is needed to make a determination, MPO staff will consult with the IAC regarding the requested change, to determine if an amendment is needed. If it is determined that a RTP and/or TIP amendment is needed, MPO staff will review the MPO meeting calendar with the project sponsor requesting the amendment to ensure that all review periods can be met for the proposed amendment to be heard at the next MPO board meeting. **Table V**, below, outlines the key milestones for amendments to the TIP and RTP.

Table V: IAC Review of RTP & TIP Amendments

IAC Review – Amendments: RTP, TIP, and associated Conformity Reports		
Key Milestones	**Plan/Program**	**Review Period**
TIP Amendment Requests Received	RTP & TIP	Approx. 3 times a year[1]
MPO staff emails IAC a list of the amendments received and timeframe for review.[2]	RTP & TIP	N/A
MPO staff emails IAC the project amendment(s), fiscal constraint documentation, and associated Air Quality Conformity Reports and/or Memo for review	RTP & TIP	14-day: Air Quality Memo (Exempt) 30-day: Short & Full Conformity (Non-Exempt)

Notes:

[1] The MPO meeting calendar and TIP amendment timeframes are established to ensure that all required review periods are met.

[2] If the status of the project is unclear, Exempt vs. Non-Exempt, IAC will be consulted to determine status in advance of the preparation and review of the associated Air Quality Conformity documents.

The project type (exempt or non-exempt) and the amendment type (requested changes), determine the type of air quality documents that are prepared for IAC review. **Figure VI** provides RTP and TIP amendment examples and the associated air quality documents. When an amendment relies on a previous emissions analysis to demonstrate conformity, a short conformity determination report is developed to document the details of the project changes and the unchanged air quality conformity status of a project.

Figure VI:

Air Quality Exempt Memo Packet	• **Project is an Exempt Project -** Based on the location of the project (Figure I) and the type of project (Table III) • **RTP/TIP Amendment Examples** - Changes to projects classified as Exempt
Air Quality Short Conformity Demonstration Report (CDR)	• **Project is a Non-Exempt Project** • **RTP/TIP Amendment Examples** - Project changes which do not require new TDM and AQ model runs (ie: fiscal constraint changes, minor changes to a project termini and scope which do not impact the model, removing a project phase which does not impact the horizon year, etc.)
Air Quality Conformity Demonstration Report (CDR)	• **Project is a Non-Exempt Project** • **RTP/TIP Amedment Examples** - Project changes which require new TDM and AQ model runs (ie: change in horizon year, adding/removing project, major changes to a project termini and scope impacting the horizon year, etc.)

Note: Examples shown for general guidance. All projects and requested amendments are reviewed on a case-by-case basis.

In the instance, when there are both short and full CDR amendment types, one full CDR (for each state) will be developed and include all non-exempt projects. Separate CDRs are developed for TN and MS since each respective state has their own established budgets.

Section VIII: Summary

The Air Quality Conformity User's Guide is intended to serve as a tool for assisting the Memphis Urban Area Metropolitan Planning Organization (MPO) Interagency Consultation Committee (IAC) members in the air quality conformity process. The guide is intended to aid in the consistency and continuity of the air quality conformity process, and will be updated as applicable with changing rules and regulations, in consultation with the IAC.