

TWG Meeting Summary
December 4, 2025
10:00 am – 12:00 pm
Microsoft Teams

Follow-up Actions from THIS MEETING

- **Anna Fildes** will prepare a summary of this meeting.
- **Madhu Venugopal and Fildes** to coordinate with **Jeff Riley** on sharing EPA information as it becomes available.

Next Meeting

- TWG Advisory Meeting - Thursday, **January 8, 2026** (tentative)
- TWG Quarterly Meeting - Thursday, **March 5, 2026** (tentative)

Participants

About 45 TWG participants attended via Microsoft TEAMS.

Venugopal led the meeting and began by welcoming attendees.

Updates and Introductions

Venugopal stated prior action items were completed.

Primary Discussion Item

- **Venugopal (TTI)** presented on [MOVES3 versus MOVES5 Sensitivity Study](#).
- **Jeff Riley (EPA)** led a discussion on EPA Reconsideration Items Relevant to the TWG. See notes below in the EPA section.
- **Venugopal** led a discussion on Pending Conformity Determination Updates.
 - **Cecilio Martinez (AAMPO)** - Conformity determination was completed in early November, and letters were received from partners and FHWA. Praised team effort and support from **Venugopal, Janie Temple, Travis Nedrich**, and TWG members. Preparing a Pre-Consensus Plan for the updated TIP (2027–2030).
 - **Claudia Valles (El Paso)** - On November 20th El Paso presented a new Pre-Consensus Plan for RMS 2052 (for the new TIP 2027-2030). Currently addressing FHWA comments and will be following up with FHWA to reschedule a meeting with them.
 - **Andrew DeCandis (HGAC)** - Conformity determination was approved by the policy council and submitted to partners before Thanksgiving. Preparing for conformity to support 2050 RTP, with an anticipated start in late 2026.
 - **Vivek Thimmavajhala (NCTCOG)** - The 2025 conformity review is going well. EPA has no comments and is ready to issue a letter once other partners

finish. Comments from TxDOT and FHWA arrived before Thanksgiving, and the team is working on responses to send back soon.

Agency Information & Updates

EPA, Jeff Riley

2024 Annual PM2.5 National Ambient Air Quality Standard – Designations/Implementation

On March 12, EPA Administrator Lee Zeldin issued an [announcement](#) that the agency will undertake 31 deregulatory actions affecting a variety of sectors of the economy. Among the 31 deregulatory actions identified:

- Reconsideration of [EPA’s February 7, 2024, strengthening of the National Ambient Air Quality Standards for Particulate Matter \(PM NAAQS\)](#), setting the level of the primary (health-based) annual PM2.5 standard at 9.0 micrograms per cubic meter to provide increased public health protection, consistent with the available health science.

The Administrator’s announcement represents a statement of agency priorities for this administration, and a “path forward”. Since the March 12 announcement, EPA has issued no policy statements, press releases or other communications on status of the 2024 PM2.5 NAAQS.

A lawsuit filed in the U.S. Court of Appeals for the D.C. Circuit (DC Circuit) by Kentucky’s attorney general and 23 other state attorneys general in March 2024 to block implementation of the strengthened NAAQS could soon provide a status update on the NAAQS. The case has been fully briefed on both sides, and oral argument was back in December 2024.

More recently, on September 4, 2025, the DC Circuit granted EPA’s request for an additional 45-day abeyance in the PM2.5 NAAQS litigation, directing EPA to file motions to govern further proceedings by October 20. The Federal government shutdown October 1- November 13 delayed EPA’s timely filing; on November 24 EPA filed a motion for the court to vacate the 2024 PM2.5 NAAQS final rule instead of keeping the case in abeyance. In the motion, EPA argues that the final rule should be vacated because EPA’s review of the NAAQS was not based on the latest scientific knowledge & used the same materials as the Agency’s December 2020 decision to retain the level of the 2012 PM2.5 NAAQS.

Environmental groups oppose EPA’s motion for vacatur and have filed to extend the responsive filing deadline to December 16, 2025. EPA will share information on reconsideration of the 2024 annual PM2.5 NAAQS as it becomes available.

Reconsideration of Ozone Reclassification Requirements Rule (O3R3) “Leftover” SIPs Policy

On June 3, EPA announced reconsideration of the January 2025 *“State Implementation Plan Submittal Deadlines and Implementation Requirements for Reclassified Nonattainment Areas*

Under the Ozone National Ambient Air Quality Standards" final rule. In a supplemental [September 15 announcement](#), EPA clarified that the subject of reconsideration is the "leftover" SIPs requirements; unresolved requirements applicable to a nonattainment area's former classification after the area is reclassified.

This reconsideration is of more significance to State air quality planning agencies, but it relates to SIP elements for a lower nonattainment classification the state must still submit to EPA upon a nonattainment area's reclassification to a higher classification (Moderate, Serious, etc.) There could be some significance to transportation partners if MVEBs in attainment demonstration SIPs or RFP SIPs are determined to no longer be required for lower classifications. Further, EPA's reconsideration may also impact highway sanctions for situations like EPA findings of failure to submit, etc. EPA is currently developing a proposed reconsideration rule & anticipates signature end of 2025/beginning of 2026.

Reconsideration of the 2009 Endangerment Finding and Greenhouse Gas Vehicle Standards

On July 29, 2025, EPA [proposed to rescind](#) the 2009 GHG Endangerment Finding and repeal all GHG emission standards for light-duty, medium-duty, and heavy-duty vehicles and engines. The Endangerment Finding is a prerequisite for regulating emissions from new motor vehicles and new motor vehicle engines. Absent this finding, EPA lacks statutory authority under Section 202 of the Clean Air Act to prescribe standards for GHG emissions. Therefore, EPA has also proposed to repeal GHG regulations for light-, medium-, and heavy-duty on-highway vehicles. The [proposed rule](#) "Reconsideration of the 2009 Endangerment Finding and Greenhouse Gas Vehicle Standards" was published in the Federal Register August 1, the public comment period was [extended](#) to September 22.

The main transportation conformity-related concern of the repeal relates to EPA's definition of the "most current" version of the MOVES model: MOVES4 includes the 2022 heavy-duty engine/vehicle standards, MOVES5 includes the 2024 light & medium-duty multipollutant rule & the heavy-duty GHG emissions Phase 3 rule. If these standards are repealed, MOVES4/MOVES5 may no longer reflect the current applicable motor vehicle emissions standards. To date, EPA OTAQ has not indicated plans to revise the MOVES model or change policy for model version use in response to the July proposed reconsideration; such plans will likely depend upon the details of the final GHG vehicle standards rulemaking, which may be signed 1st quarter 2026.

TCEQ, Sarah Thomas

Sarah Thomas shared the following updates:

- On September 24, 2025, the commission adopted the House Bill 3297 and Senate Bill 2102 Implementation Inspection and Maintenance State Implementation Revision and associated rulemaking.

- On October 22, 2025, the commission adopted the TCEQ Section 185 Penalty Fee Program specific to the 2008 eight-hour ozone National Ambient Air Quality Standard.

MPO – State Roundtable (For those in attendance) – Status & Updates

Cecilio Martinez – Introduce **Kenneth Loebeck** as their new short-range planner. Asked about EPA adequacy determination for emission budgets, and **Riley** clarified no set timeline yet.

Bob Dickinson – Beaumont-MPO is working with TxDOT TPP to update the 2055 Travel Demand Model and preparing a Pre-Analysis Consensus Plan for the next MTP update.

Claudia Valles - El Paso has started coding projects and will review the network with consultation agencies before sending it for emissions assessment.

Andrew DeCandis – Introduced **Madeline Statkewicz** who will lead future conformity efforts starting late 2026.

Vivek Thimmavajhala – NCTCOG working on CPRG grant, deadline extended to **June 1, 2026**.

Federal – State Roundtable (For those in attendance) – Status & Updates

Jose Campos (FHWA) had no additional comments other than to note that staffing is reduced following Barbara Maley’s retirement and others' departure, so they are focused on cross-training the team on air quality issues.

Laura Norton (TPP) noted **Temple** is out due to TEMPO meeting but shared that interviews for open positions are complete, offers are in progress, and new hires should start January 1. One of these positions will focus on air quality.

Glendora Lopez (ENV) noted **Tim Wood** is out due to the TEMPO meeting and had no updates to share.

TTI, Madhu Venugopal

Venugopal shared the following TTI updates:

- MOSER strategy tool will be published soon.
- New PACP and conformity templates are being developed to incorporate feedback.
- MOVES5 utilities package will be available soon.
- Training modules available via the [TX AQ Portal](#) and in-person training can be scheduled in coordination with TTI and TxDOT.

The next TWG advisory meeting is on **January 8th** and the quarterly meeting is on **March 5th**.

Finally, participants are encouraged to reach out to **Fildes** or **Venugopal** if they have something to present or share that would benefit TWG participants.

(Meeting Concluded)