
TWG Meeting Summary

June 4, 2026

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** will schedule a training session to review existing conformity tools and processes, including QA tool, National scan results, Checklists, and Current streamlining efforts to avoid duplication of work
- **Venugopal** will explore organizing a discussion/workgroup on grouped projects and conformity, including how grouped CSJs relate to conformity and emissions, and clarifying that grouped projects are not automatically exempt from conformity
- **Clint Anderson** will coordinate a follow-up discussion on “project list snapshot in time” (Clarify when the project list is effectively “locked” for conformity review)
- **Anderson** will take lead on organizing a working group on Regionally Significant project definitions to improve statewide consistency (while maintaining MPO authority)
- **Venugopal** and **Anderson** will explore discussion opportunities for improved statewide consistency in formats, definitions, and practices. Coordination with MPOs to support alignment across regions

Next Meeting

- TWG Advisory Meeting - Thursday, **July 2, 2026** (tentative)
- TWG Quarterly Meeting - Thursday, **September 10, 2026** (tentative)

Participants

About 46 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

- **Clint Anderson** (TxDOT) presented on “Comment Lookback: Patterns and Lessons from Recent Conformity Determinations”
 - AAMPO asked for clarification on “snapshot in time” concept for project lists (submission vs review vs board approval timing).
 - Concern raised that project lists often change during long review periods, complicating consistency.
 - The group discussed the need for clearer, consistent guidance on what constitutes the correct reference point for project lists during conformity

review.

- o **Janie Temple** (TxDOT) clarified that consistency must exist at the initial submission stage (public involvement and policy board approval), establishing a clear “starting block” project list for conformity review.
- o Process improvement topics included:
 - Clarifying when the project list is “locked” for review.
 - Reviewing and improving definitions of “regionally significant” projects
 - Better guidance on handling grouped projects in conformity
- o **Tim Wood** noted ongoing confusion due to multiple project lists at different stages and emphasized that only one “effective” project list exists at a time, even if multiple drafts are in circulation. He suggested better tracking and clarity between active vs. draft lists.
- o **Anderson's** presentation and the ensuing discussion highlighted broader needs:
 - A follow-up session on project list timing and process.
 - Review and improve “regionally significant” definitions
 - Explore grouped project handling in conformity.
 - Revisit existing streamlining tools and resources to avoid duplication.
- **EPA Reconsideration Items Relevant to the TWG** – Jeff Riley was unable to attend but shared EPA updates which can be found in the next section below.
- **Updates on Pending Conformity Determinations** - See MPO notes below for more details.

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.

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 sought to block implementation of the strengthened NAAQS. On November 24, 2025, 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. We await the court's ruling.

Title I of the Clean Air Act requires that after EPA sets a new NAAQS or revises an existing standard, we must then designate areas in the United States as being in "attainment" or "nonattainment" with the standard. CAA Section 107(d)(1)(B) specifically requires the EPA to issue these initial area designations within 2 years of promulgating a new or revised NAAQS. The 2024 revision to the PM2.5 NAAQS was promulgated February 7, 2024, and on February 7, 2026, we passed that statutory deadline without having issued area designations.

On February 10, 2026, Earthjustice sent a Notice of Intent letter to the EPA Administrator on behalf of 18 organizations to commence a civil action against the EPA Administrator for failure to perform the nondiscretionary duty under the CAA to promulgate area designations nationally within 2 years of the February 7, 2024, promulgation of the revised primary annual PM2.5 NAAQS. On April 13, 2026, Earthjustice filed a Complaint for Declaratory and Injunctive Relief in the Northern District of California Court.

EPA will share information on reconsideration of the 2024 annual PM2.5 NAAQS as it becomes available.

Rescission of the Greenhouse Gas (GHG) Endangerment Finding and Motor Vehicle GHG Emission Standards Under the Clean Air Act

On February 12, 2026, EPA finalized its rescission of the 2009 GHG Endangerment Finding, which served as a prerequisite for regulating GHG emissions from new motor vehicles and new motor vehicle engines. Absent this finding, EPA lacks statutory authority under Section 202(a) of the Clean Air Act to prescribe standards for GHG emissions. EPA also finalized the repeal of all subsequent GHG emission standards from its regulations for light-, medium-, and heavy-duty on-highway vehicles and engines. As a result of these changes, engine and

vehicle manufacturers no longer have any future obligations for the measurement, control, and reporting of GHG emissions for any highway engine and vehicle, including model years manufactured prior to this final rule. This final action is only related to the GHG emissions element of the standards and does not impact the 'traditional' air pollutant (NOx, VOCs, PM) co-benefits of the highway vehicle/engine standards.

On February 18, the American Public Health Association and 16 other parties filed a [petition for review](#) of EPA's final rule in the DC Circuit.

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. EPA OTAQ has indicated plans to develop and release MOVES6 by the end of 2026 to address the final rescission of the GHG standards. MOVES6 updates will also include revised projections of EV adoption.

Revision of Tier 4 Criteria Pollutant Standards, Part 1: Amendments to Phase-In Schedule for Light-Duty and Medium-Duty Vehicles

On May 14, EPA proposed the first phase of a two-part Tier 4 standards rulemaking. This Part 1 action is intended to allow EPA more time for reconsideration of the Tier 4 standards themselves before they are implemented, followed with a future Part 2 rulemaking for EPA to address potential updates to Tier 4 standards and related program elements. EPA is proposing to amend the phase-in schedule for the Tier 4 criteria pollutant standards for certain vehicles, highlighting changing circumstances and feasibility concerns. These amendments, if finalized, would extend the Tier 3 standards for certain vehicles to MYs2027 and 2028 such that the Tier 4 standards for these vehicles would phase in starting with MY2029. The EPA is also proposing other changes to the test protocols used to evaluate emissions performance for certification and related regulatory issues.

The [proposal](#) published in the Federal Register May 18, 45-day comment period closes July 6. ([More info](#))

TCEQ, Sarah Thomas

Sarah Thomas had no comments.

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

Cecilio Martinez – AAMPO conducted an initial PACP meeting and is working on updates to incorporate feedback received. Aiming for follow-up meetings in mid-late June and requested partner availability. Submitted clean list updates for November determination.

Bob Dickinson – Beaumont submitted TIP and MTP amendments and is working on 2055 travel demand model demographics.

Claudia Valles – El Paso completed public involvement and received TPB adoption of plans (MTP and conformity report). Preparing documents for consultation review submission. Expressed strong interest in a regionally significant definition discussion due to recent comments received.

Madeline Statkewicz – H-GAC received FHWA comments (March 27), responded April 22, received additional comments May 29, and is now in a third response cycle. Next conformity cycle planned for October 2026. Expressed interest in streamlining and regional significance discussions. (Post-meeting note: H-GAC transmitted its responses in the third response cycle on Tuesday, June 9, 2026.)

Vivek Thimmavajhala – NCTCOG received conformity determination April 30, restarting the 4-year clock (through 2030). Emphasized the need for consistency in how data is presented, in addition to definitions and streamlining efforts.

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

Clint Anderson (TPP) emphasized the need to use correct contact points and encouraged participants to refer to the updated consultative partners contact list on the AQ portal. Registration encouraged for PLANCON26 (July 15-16), including a conformity workshop (July 14, pre-conference session).

Post-meeting note: The workshop titled *Managing Change and Risk in Transportation Conformity and Air Quality* will run July 14 from 9:30 – 12:00 and will bring together Texas nonattainment MPOs and TxDOT partners to discuss common sources of uncertainty (e.g., project changes, data and schedule dependencies, evolving requirements), share practical strategies for managing them, and identify opportunities to improve consistency and efficiency in the conformity process statewide.

Tim Wood (ENV) encouraged registration for the Environmental Conference (Sep 1-3, Round Rock). **Glendora Lopez** noted a general air quality update session, and a session regarding how project changes affect planning to letting, including how changes can impact conformity, and best practices for coordinating and communicating changes.

Janie Temple congratulated **Venugopal** on receiving TTI's Dock Burke Legacy Award (2026).

TTI, Madhu Venugopal

Venugopal shared that TTI is continuing the development of tools and data improvements.

- QA and Automation Tools: MPO self-service QA platform allowing users to upload networks, staging tables, and run checks independently.
- Project Classification Validation: Additional QA checks to verify project classification (exempt vs non-exempt)
- AQMS prototype currently under review (TPP), with a future demonstration meeting planned
 - Editable schedules for MPOs
 - Comparison of planned vs actual timelines
 - Scenario testing capability
- Data Standardization: Annual release of standardized datasets (Nov–Dec), aligned with TxDOT data cycles, to ensure consistent inputs across conformity processes.

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)