

TWG Meeting Summary

March 5, 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 training sessions and demonstrations for the updated conformity documentation platform, emissions strategies tool, and the air quality master schedule.
- **Clint Anderson** will reach out to MPOs to form a subcommittee on conformity documentation automation and standardization.

Next Meeting

- TWG Advisory Meeting - Thursday, **April 4, 2026** (tentative)
- TWG Quarterly Meeting - Thursday, **June 4, 2026** (tentative)

Participants

About 55 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

- **Vivek Thimmavajhala** (NCTCOG) presented on [MOVES Model Experiences, Results, and Observations](#)
 - **Glendora Lopez** posed a general question to the group regarding potential litigation risk of using regional analyses based on MOVES4/5 for project-level conformity.
 - **Jeff Riley** said EPA typically recommends using the most current MOVES model, but acknowledged the situation is complicated and there is no clear legal answer yet.
 - **Janie Temple** added that project-level analyses rely on additional datasets beyond the regional model and that issues would be identified early through consultation if concerns arise.
 - **Venugopal** emphasized continued use of EPA's approved model while also incorporating local data and sensitivity analyses to understand impacts of changing assumptions.

- **Bumsik Kim** (TTI) presented on [Quantifying the Real Impact of Transportation Activity on Regional Ozone](#)
 - **Chris Klaus** asked whether reduced traffic still implies reduced emissions; **Kim** said yes for most pollutants, but ozone behaves differently in VOC-limited areas.
 - **Tao Li** questioned why modeling was used instead of monitors; **Kim** explained that a no-COVID scenario requires modeling, but results were validated against observations.
 - **Venugopal** asked about model bias and comparison with CAMx; **Kim** said bias was small but did not have numbers available and noted they did not compare against CAMx.
 - **Klaus** and **Andrew DeCandis** raised broader questions about changing NOx/VOC regimes, long-term trends, and implications for SIP photochemical modeling; **Kim** agreed this warrants further study.
- **Janie Temple** reminded members that TWG can support additional research proposals if members identify specific technical needs.
- **Jeff Riley (EPA)** discussed EPA Reconsideration Items Relevant to the TWG. See notes below in the EPA section.
- **Venugopal** led a discussion on Pending Conformity Determination Updates.
 - **Klaus** requested that TWG reevaluate the assumed 150-day review timeline, as recent conformity determinations have taken longer and could affect MPO scheduling. **Clint Anderson** acknowledged the concern and said TxDOT will coordinate with MPOs to review recent experiences and adjust expectations as warranted.
 - **Genevieve Bales** reported that FHWA is working through several CMAQ reporting submissions and has encountered instances of negative emissions values, which require MPOs to correct and resubmit their reports. FHWA is also cross-training more staff so that conformity and air quality responsibilities are not reliant on only one or two individuals, ensuring faster and more consistent reviews.
 - **Phillip Tindall** added that he personally saw at least one example of negative emissions data that he could not correct in the system. He explained that he approved the submission only so that it could proceed to the next processing step, then immediately asked **Jose Campos** to reject it and return it to the MPO for proper correction. He confirmed that FHWA is actively coordinating with the MPOs involved to fix the errors and keep the reporting process on track.

- Additional conformity updates provided in the MPO section below.

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 ([Notice of Intent](#)) 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.

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. To date, EPA OTAQ has not indicated plans to revise the MOVES model or change policy for model version use in response to the final rescission of the GHG standards.

TCEQ, Sarah Thomas

Sarah Thomas had no comments.

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

Cecilio Martinez – AAMPO’s next conformity cycle is beginning soon. AAMPO reached out to TTI to schedule conformity training for April to ensure readiness before modeling and documentation work begins.

Bob Dickinson – Beaumont has executed its modeling contract and will begin developing demographic and modeling inputs for its 2055 travel demand model update. Development of their FY 2027–2030 TIP is underway. Thanks to TxDOT staff, particularly Tammye Fontenot, for their support.

Claudia Valles – El Paso is currently waiting for FHWA’s approval of its final conformity Pre-Analysis Consensus Plan (PACP). Their regional travel demand model is already finalized and ready for emission modeling once the PACP is approved. They are also completing final touches on their new Metropolitan Transportation Plan, which will go out for public involvement alongside the conformity report upon approval.

Andrew DeCandis – H-GAC’s conformity determination was submitted in November and they have received several rounds of comments from FHWA, TxDOT, and TCEQ. H-GAC is awaiting follow-up comments and currently remain in a holding pattern (107 days as of the meeting date).

Vivek Thimmavajhala – NCTCOG is in the final stages of its 2025 conformity determination for the Mobility 2050 plan. NCTCOG has prepared responses to the set of FHWA comments but has requested a meeting with FHWA to clarify a few points before sending them. NCTCOG hopes to get a conformity determination soon.

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

Clint Anderson (TPP) had no additional comments.

TTI, Madhu Venugopal

Venugopal shared the following TTI updates:

- TTI has updated the conformity documentation template based on all corrections and feedback from the previous conformity cycle, and a revised draft is nearly ready for distribution.
- The emissions reduction strategies have been fully migrated from Excel to a new web-based platform, with user comments incorporated; a virtual walkthrough session will be scheduled soon.
- TTI has developed a new Air Quality Master Schedule tool that allows MPOs to enter

and adjust their own timelines and identify overlaps or conflicts with other regions and federal actions.

- A training and demonstration session for both the strategies platform and master schedule will be arranged, with scheduling information to be sent by **Fildes**.
- All meeting presentations are already posted on the TWG portal, and the meeting summary will be uploaded once finalized.
- The next TWG meeting is planned for June, and members are encouraged to share any date conflicts.

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)