Pre-Analysis Consensus Plan (PACP)

1. Parameter	Preparer's input
MPO	NCTCOG
RTP/MTP	Mobility 2050
RTP/MTP Years Covered	2026-2050
TIP	2025 - 2028 Transportation Improvement Program
TIP Years Covered	2025-2028
Base Year	N/A
Analysis Years	2026, 2035, 2040, 2050

Note: N/A = not applicable

PACP Submission Information

Prepared by	North Central Texas Council of Governments
Date	Details
3/27/2025	Present to the Consultation Partners the Draft Pre-Analysis Consensus Plan for Review
7/18/2025	Present to the Consultation Partners the Revised Draft Pre- Analysis Consensus Plan for Review
7/31/2025	Present to the Consultation Partners the Revised Draft Pre- Analysis Consensus Plan for Review
7/31/2025	Present to the Consultation Partners the Final Pre-Analysis Consensus Plan

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1. The Purpose of Transportation Conformity Emissions Analysis

Table 1: Reasons for the Transportation Conformity Emissions Analysis (40 CFR § 93.104)

Check Box	Reasons	Years Covered
Х	a. New Metropolitan/Regional Transportation Plan (demographics, horizon year, etc.)	2026 - 2050
	b. Modify Existing Metropolitan/Regional Transportation Plan (interim year adjustments)	
	c. New or Amended Transportation Improvement Program	
	d. State Implementation Plan (SIP) Requirements	
	e. Newly Designated Non-Attainment Area	
	f. Other	

Explanation:

a. Mobility 2050 is the upcoming Metropolitan Transportation Plan for North Central Texas. The horizon year would be 2050. New demographic inputs will be developed and utilized for the four analysis years. Mobility 2050 is expected to include a majority of the ultimate recommendations from transportation projects identified in Mobility 2045: 2022 Update and will refine those project recommendations for implementation across all modes of transportation. The funding element of this financially constrained plan will incorporate new revenue sources and will seek to strike a balance between tax- and toll-funded infrastructure. The Regional Transportation Council (RTC) is scheduled to take action on the approval of Mobility 2050 in June 2025.

2. Timeline for the Transportation Conformity Document Development

Table 2: Anticipated Transportation Conformity Timeline

#	Task Items	Timeframe
1	Pre-Analysis Consensus Plan Review and Approval	03/27/2025 - 07/31/2025
2	Travel Model Networks Development and Emissions Analysis	03/01/2025 - 05/23/2025
3	Public Meetings and Comment Period	05/05/2025 - 06/12/2025
4	Regional Policy Board Information	05/08/2025
	Regional Policy Board Adoption	06/12/2025
5	Consultative Partner Review Period	08/15/2025 - 12/15/2025
6	U.S. Department of Transportation - Transportation	12/15/2025
	Conformity Determination Anticipated	
7	Transportation Conformity Lapse Grace Period begins	12/15/2026
	(4-year clock ends)	

3. Metropolitan Transportation Plan(MTP)/Transportation Improvement Program (TIP)

Table 3: MTP/TIP

Plan or Programs	Years Covered
Mobility 2050: The Metropolitan Transportation Plan for North Central Texas	2026 - 2050
2025–2028 Transportation Improvement Program for North Central Texas	2025 - 2028

A regionally significant project means a transportation project (other than projects that may be grouped in the TIP and/or Statewide Transportation Improvement Program or exempt projects as defined in EPA's transportation conformity regulation [40 CFR § part 93]) that is on a facility that serves regional transportation needs (e.g., 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, 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 guided way transit facilities that offer a significant alternative to regional highway travel. A more comprehensive definition and set of criteria considered to determine regionally significant roadways can be provided upon request.

4. Applicable State Implementation Plan, Related Emissions Budget, and Transportation Control Measures (TCM)

Table 4: Applicable SIP and Emissions Budget(s)

SIP Element	Description
Title of Applicable SIP(s)	Dallas-Fort Worth (DFW) Serious Classification Reasonable Further Progress (RFP) (TCEQ Adopted: 03/04/2020; EPA SIP revision approval, including Motor Vehicle Emissions Budgets (MVEBs) Effective: 05/24/2023)
Motor Vehicle Emissions Budgets	Current MVEBs for 2020 (2008 Ozone NAAQS Serious - Attainment Year RFP SIP) NO _x : 107.25 tons/day VOC: 62.41 tons/day

Transportation Conformity Pre-Analysis Consensus Plan (§93.105)

Table 5: TCM

SIP Element	Description
	Dallas-Fort Worth 1997 8-Hour Ozone Moderate Nonattainment Area Attainment Demonstration State Implementation Plan Revision (TCEQ Adoption/Action 05/23/2007, EPA Approval 01/14/2009)
Transportation Control	Environmental Speed Limit Revision for the Dallas/Fort Worth 8-Hour Ozone Nonattainment Area (TCEQ Adoption/Action 08/25/2010, EPA Approval 01/09/2014)
Measures	Environmental Speed Limit Revision for the Dallas-Fort Worth 8-Hour Ozone Nonattainment Area Notice of Administrative Change, Approval of Substitution for Transportation Control Measures (TCEQ Adoption/Action 11/24/2014, EPA Approval in 79 FR 1596 on 03/03/2015)
	HOV Lane TCM Replaced with Traffic Signalization Projects (Adopted 5/31/2016; Approved 11/09/2016) and Transportation Control Measure Substitution in Dallas-Fort Worth Ozone Nonattainment Area (TCEQ Adoption/Action 2/18/2020, EPA Approval 6/17/2020)

5. Conformity Analysis Years

Per CFR § 93.106(a)(1)(i), analysis years cannot be more than 10 years apart.

Table 6: Conformity Analysis Years

Requirement	Year
Conformity Base Year	N/A
Attainment Year	The existing 10 DFW nonattainment counties were reclassified as a severe nonattainment area for the 2008 8-hour Ozone NAAQS with an attainment date of July 20, 2027 (attainment year would be 2026) 9 of those 10 DFW nonattainment counties (excluding Rockwall County) were reclassified as a serious nonattainment area for the 2015 8-hour Ozone NAAQS with an attainment date of August 03, 2027 (attainment year would be 2026)
Last Year of Maintenance Plan	N/A
Analysis Years	2026, 2035, 2040, 2050
Other	N/A

6. Demographics Used in Conformity Analysis

Table 7: Demographics

Data Element	2026, 2035, 2040, and 2050 Analysis Years Detail and Source of Data
Population	The forecast was developed using observed data from 2010, 2015, and 2019. County control totals are based on various independent estimates. The distribution of smaller geographic areas within counties was determined using a land use/demographic model, comprehensive plans, and input from local governments. Population estimates for years between 2019 and 2035 were calculated through a linear interpolation between 2019 and the long-term forecast for 2035. Population estimates for years between 2035 and 2050 were calculated through a linear interpolation between the long-term forecast for 2035 and long-term forecast for 2050.
Employment	The forecast was developed using observed data from 2010, 2015, and 2019. County control totals are based on various independent estimates. The distribution of smaller geographic areas within counties was determined using a land use/demographic model, comprehensive plans, and input from local governments. Employment estimates for years between 2019 and 2035 were calculated through a linear interpolation between 2019 and the long-term forecast year for 2035. Employment estimates for years between 2035 and 2050 were calculated through a linear interpolation between the long-term forecast for 2035 and long-term forecast for 2050.
Other	N/A

7. Travel Demand Model

Table 8: Zone Structure

Model Factor	Detail
Study Area (sq-mi)	10,480
Traffic Analysis Zones	5,352
Counties Covered by Model	Collin, Dallas, Denton, Ellis, Hood, Hunt, Johnson, Kaufman, Parker, Rockwall, Tarrant, Wise, and Hill (Hill employed for travel modeling purposes only and will not be reported. While Hood and Hunt counties are part of the Metropolitan Planning Area (MPA), they will also not be reported since they are outside the nonattainment area). All nonattainment counties are contained within modeled area.

Table 9: Validation and HPMS

Model Factor	Detail
Model Validation Year	2019
Software	TransCAD, Transportation Analytical Forecasting Tool (TAFT)
Vehicle Miles Travel (VMT) Adjustments (Highway Performance Monitoring System (HPMS) Factor)	0.9438
Other	N/A

Table 10: Seasonal Factors

Model Factor	Detail
Seasonal Factors	Represents summer weekday from non-summer weekday activities; based on an average from 2022-2023 TxDOT Permanent Stations Automatic Traffic Recorder (ATR) factors. Detailed Factors can be provided upon request.

Table 11: Hourly Distribution Factors

Model Factor	Detail
Hourly Distribution Factors	Regionally specific hourly VMT distributions reflected in the hourly link-VMT estimates; based on 2022-2023 TxDOT Permanent Stations Automatic Traffic Recorder (ATR) factors. Detailed Factors can be provided upon request.

8. Emissions Modeling

Table 12: Emissions Modeling Parameters and External Conditions

Parameters	Detail
Pollutants	Oxides of Nitrogen (NO _X) & Volatile Organic Compounds (VOC)
Emission Model Version	MOVES3.1
Analysis Year Runs	2026, 2035, 2040, and 2050
Time Periods	Hourly
Functional Class	Urban Restricted, Rural Restricted, Urban Unrestricted, and Rural Unrestricted
VMT Mix	EPA's 24-vehicle class; applied post-process; Texas A&M Transportation Institute (TTI) provided the data. Four-period, time-of-day VMT mixes for conventional gasoline and diesel source-use type by functional class estimated using the latest vehicle classification count (2013–2021) and associated year-end registration data. No seasonal adjustments are made for VMT mix).
Speed	1-75 miles per hour (mph) at 5 mph increments; in between speeds are interpolated
Vehicle Age Distribution Data	End-of-year 2021
Base Year	N/A
Analysis Years	2026, 2035, 2040, and 2050 (Attainment demonstration year and plan forecast years)
Evaluation Month	July

Table 13: MOVES Input Parameters and Source

-	Table 15. WOVEO Input 1 arameters and oburde					
Input Parameter Name	Description	Source				
Source Type Population	Input the number of vehicles in the geographic area, which is to be modeled for each vehicle, and apply the appropriate growth factors for each analysis year.	End-of-year 2021 TxDMV registration data				
Source Type Age Distribution	Input that provides the distribution of vehicle counts by age for each calendar year and vehicle type. TxDMV registration data is used to estimate the age distribution of vehicle types up to 31 years. The distribution of Age fractions should sum up to 1.0 for all vehicle types for each analysis year.	End-of-year 2021 TxDMV registration data; MOVES defaults for refuse trucks, motor homes, and buses				
Vehicle Type VMT	County specific VMT is distributed to HPMS Vehicle types.	Travel Model Output				
Average Speed Distribution	Input average speed data specific to vehicle type, road type, and time of day/type of day into 16 speed bins. The sum of speed distribution to all speed bins for each road type, vehicle type, and time/day type is 1.0.	Travel Model Output				
Road Type Distribution (VMT Fractions)	Input County specific VMT by road type. VMT fraction is distributed between the road type and must sum to 1.0 for each source type.	Travel Model Output				
Fuel Supply	Input to assign existing fuels to counties, months, and years, and to assign the associated market share for each fuel.	TTI, TCEQ, EPA Fuel Surveys and default MOVES input where local data unavailable				
Fuel Formulation	Input county specific fuel properties in the MOVES database.	TTI, TCEQ, EPA Fuel Surveys and default MOVES input where local data unavailable				
Meteorology	County specific data on temperature, relative humidity and barometric pressure.	Regional data from TCEQ				
Inspection and Maintenance (I/M) Coverage	Input I/M coverage record for each combination of pollutants, process, county, fuel type, regulatory class, and model year are specified using this input.	TCEQ				
Fuel Engine Fraction/Diesel Fraction	Input fuel engine fractions (i.e. Gasoline vs. Diesel Engines types in the vehicle population) for all vehicle types.	End-of-year 2021 TxDMV registration data for particular source type diesel fractions; MOVES defaults for other source types (TTI provided the data. The evaluation year-specific local diesel fractions for the MOVES single unit and combination truck source use types were developed using the TxDMV data, for all analysis years, aggregated to the statewide level).				

Table 14: Fuel Supply

Fuel Formulation ID	Market Share	Market Share CV ¹
2678	1	0
30600	1	0

Table 15: Fuel Properties²

Fuel Type	Gasoline	Diesel
Fuel Formulation ID	2678	30600
Fuel Subtype ID	12	21
RVP	7.09	0
Sulfur Level	10	6
ETOH Volume	9.56	0
MTBE Volume	0	0
ETBE Volume	0	0
TAME Volume	0	0
Aromatic Content	16.98	0
Olefin Content	10.08	0
Benzene Content	0.37	0
e200	46.96	0
e300	85.00	0
Vol to Wt Percent Oxy	0.3653	0
BioDieselEster Volume	N/A	2.82
Cetane Index	N/A	N/A
PAH Content	N/A	N/A
T50	210.50	0
T90	325.10	0

¹ Market Share CV – the coefficient variation of the market share

² RFG is based on the EPA's data from the 2020 Summer Study. Future years (2024+) diesel sulfur was set to the current expected future year value (6 ppm). The BD ester volume percentages for future years were the latest available (2022) DOE state-level transportation sector BD consumption estimates. (published in June 2024).

Table 16: Meteorological Data (2011 Hourly Temperatures)³

		1 41		otool olog	loai Bata (2	OTT HOUTIY		100)		
Hour	Collin	Dallas	Denton	Ellis	Johnson	Kaufman	Parker	Rockwall	Tarrant	Wise
12:00 AM	85.18	85.18	85.18	85.18	85.55	85.18	85.55	85.18	85.55	85.55
1:00 AM	84.01	84.01	84.01	84.01	84.40	84.01	84.40	84.01	84.40	84.40
2:00 AM	82.97	82.97	82.97	82.97	83.06	82.97	83.06	82.97	83.06	83.06
3:00 AM	81.91	81.91	81.91	81.91	81.82	81.91	81.82	81.91	81.82	81.82
4:00 AM	80.79	80.79	80.79	80.79	80.87	80.79	80.87	80.79	80.87	80.87
5:00 AM	79.73	79.73	79.73	79.73	79.56	79.73	79.56	79.73	79.56	79.56
6:00 AM	78.85	78.85	78.85	78.85	78.64	78.85	78.64	78.85	78.64	78.64
7:00 AM	80.01	80.01	80.01	80.01	79.29	80.01	79.29	80.01	79.29	79.29
8:00 AM	82.83	82.83	82.83	82.83	82.76	82.83	82.76	82.83	82.76	82.76
9:00 AM	86.30	86.30	86.30	86.30	86.59	86.30	86.59	86.30	86.59	86.59
10:00 AM	89.61	89.61	89.61	89.61	89.88	89.61	89.88	89.61	89.88	89.88
11:00 AM	92.62	92.62	92.62	92.62	93.30	92.62	93.30	92.62	93.30	93.30
12:00 PM	95.10	95.10	95.10	95.10	95.90	95.10	95.90	95.10	95.90	95.90
1:00 PM	97.02	97.02	97.02	97.02	97.72	97.02	97.72	97.02	97.72	97.72
2:00 PM	98.43	98.43	98.43	98.43	99.34	98.43	99.34	98.43	99.34	99.34
3:00 PM	99.36	99.36	99.36	99.36	100.26	99.36	100.26	99.36	100.26	100.26
4:00 PM	99.83	99.83	99.83	99.83	100.72	99.83	100.72	99.83	100.72	100.72
5:00 PM	99.57	99.57	99.57	99.57	100.42	99.57	100.42	99.57	100.42	100.42
6:00 PM	98.38	98.38	98.38	98.38	99.30	98.38	99.30	98.38	99.30	99.30
7:00 PM	96.03	96.03	96.03	96.03	97.18	96.03	97.18	96.03	97.18	97.18
8:00 PM	92.57	92.57	92.57	92.57	93.54	92.57	93.54	92.57	93.54	93.54
9:00 PM	89.93	89.93	89.93	89.93	90.73	89.93	90.73	89.93	90.73	90.73
10:00 PM	88.10	88.10	88.10	88.10	88.71	88.10	88.71	88.10	88.71	88.71
11:00 PM	86.49	86.49	86.49	86.49	86.90	86.49	86.90	86.49	86.90	86.90

³ Data provided by the TCEQ based on combined data from LEADS, NWS, and U.S. Air Force.

Table 16 (continued): Meteorological Data (2011 Hourly Relative Humidity Data)⁴

	T dblc 1	lo (contin	laca). Wic	, LCOI OIO	gicai Data (TCIALIVE	Tidifficity Da	lu)	
Hour	Collin	Dallas	Denton	Ellis	Johnson	Kaufman	Parker	Rockwall	Tarrant	Wise
12:00 AM	50.15	50.15	50.15	50.15	46.12	50.15	46.12	50.15	46.12	46.12
1:00 AM	52.90	52.90	52.90	52.90	49.02	52.90	49.02	52.90	49.02	49.02
2:00 AM	55.75	55.75	55.75	55.75	52.67	55.75	52.67	55.75	52.67	52.67
3:00 AM	58.76	58.76	58.76	58.76	56.13	58.76	56.13	58.76	56.13	56.13
4:00 AM	61.87	61.87	61.87	61.87	58.63	61.87	58.63	61.87	58.63	58.63
5:00 AM	64.62	64.62	64.62	64.62	61.78	64.62	61.78	64.62	61.78	61.78
6:00 AM	67.70	67.70	67.70	67.70	64.12	67.70	64.12	67.70	64.12	64.12
7:00 AM	66.62	66.62	66.62	66.62	63.75	66.62	63.75	66.62	63.75	63.75
8:00 AM	61.31	61.31	61.31	61.31	57.63	61.31	57.63	61.31	57.63	57.63
9:00 AM	54.11	54.11	54.11	54.11	50.25	54.11	50.25	54.11	50.25	50.25
10:00 AM	47.49	47.49	47.49	47.49	43.90	47.49	43.90	47.49	43.90	43.90
11:00 AM	41.71	41.71	41.71	41.71	37.73	41.71	37.73	41.71	37.73	37.73
12:00 PM	37.19	37.19	37.19	37.19	33.36	37.19	33.36	37.19	33.36	33.36
1:00 PM	33.77	33.77	33.77	33.77	30.55	33.77	30.55	33.77	30.55	30.55
2:00 PM	31.20	31.20	31.20	31.20	27.84	31.20	27.84	31.20	27.84	27.84
3:00 PM	29.42	29.42	29.42	29.42	26.27	29.42	26.27	29.42	26.27	26.27
4:00 PM	28.42	28.42	28.42	28.42	25.32	28.42	25.32	28.42	25.32	25.32
5:00 PM	28.30	28.30	28.30	28.30	25.17	28.30	25.17	28.30	25.17	25.17
6:00 PM	29.47	29.47	29.47	29.47	26.04	29.47	26.04	29.47	26.04	26.04
7:00 PM	32.42	32.42	32.42	32.42	28.45	32.42	28.45	32.42	28.45	28.45
8:00 PM	37.26	37.26	37.26	37.26	32.77	37.26	32.77	37.26	32.77	32.77
9:00 PM	41.36	41.36	41.36	41.36	36.64	41.36	36.64	41.36	36.64	36.64
10:00 PM	44.22	44.22	44.22	44.22	39.91	44.22	39.91	44.22	39.91	39.91
11:00 PM	47.42	47.42	47.42	47.42	43.27	47.42	43.27	47.42	43.27	43.27

⁴ Data provided by the TCEQ based on combined data from LEADS, NWS, and U.S. Air Force.

Table 16 (continued): Meteorological Data (2011 Barometric Pressure Data)⁵

County	Barometric Pressure
Collin	29.87
Dallas	29.87
Denton	29.87
Ellis	29.87
Johnson	29.85
Kaufman	29.87
Parker	29.85
Rockwall	29.87
Tarrant	29.85
Wise	29.85

⁵ Data provided by the TCEQ based on combined data from LEADS, NWS, and U.S. Air Force.

Table 17: I/M Descriptive Inputs for Subject Counties

2026								
Collin, Dallas, Denton, Elli	Collin, Dallas, Denton, Ellis, Johnson, Kaufman, Parker, Rockwall, and Tarrant I/M Data ⁶							
I/M Program ID	20	Differentiates I/M programs						
Pollutant Process ID	101, 102, 201, 202, 301, 302	112	Identifies the pollutant and vehicle process					
Source Use Type	21, 31, 32	21, 31, 32	Identifies the vehicle type					
Begin Model Year	2002	2002	Model year I/M Program begins					
End Model Year	2024	2024 2024						
Inspection Frequency	1	1 1						
Test Standards Description	Exhaust OBD Check	I Can and OBD I						
Test Standards ID	51	Identifies test with MOVES3.1 database test standards IDs						
I/M Compliance	93.90% for source source t 70.67% for	Expected compliance (%) - MOVES3.1 Default						

⁶ Wise County does not have I/M program.

Table 17 (continued): I/M Descriptive Inputs for Subject Counties

2035								
Collin, Dallas, Denton, E	Collin, Dallas, Denton, Ellis, Johnson, Kaufman, Parker, Rockwall, and Tarrant I/M Data							
I/M Program ID	20	20 24						
Pollutant Process ID	101, 102, 201, 202, 301, 302	112	Identifies the pollutant and vehicle process					
Source Use Type	21, 31, 32	21, 31, 32	Identifies the vehicle type					
Begin Model Year	2011	2011	Model year I/M Program begins					
End Model Year	2033	2033	Model year I/M Program ends					
Inspection Frequency	1	1	Annual testing; program specifications					
Test Standards Description	Exhaust OBD Check	Evaporative Gas Cap and OBD Check	Identifies test type					
Test Standards ID	51 45		Identifies test with MOVES3.1 database test standards IDs					
I/M Compliance	93.90% for source source 70.67% for	Expected compliance (%) - MOVES3.1 Default						

Table 17 (continued): I/M Descriptive Inputs for Subject Counties

2040								
Collin, Dallas, Denton, Ellis, Johnson, Kaufman, Parker, Rockwall, and Tarrant I/M Data								
I/M Program ID	20	24	Differentiates I/M programs					
Pollutant Process ID	101, 102, 201, 202, 301, 302	112	Identifies the pollutant and vehicle process					
Source Use Type	21, 31, 32	21, 31, 32	Identifies the vehicle type					
Begin Model Year	2016	2016	Model year I/M Program begins					
End Model Year	2038	2038	Model year I/M Program ends					
Inspection Frequency	1	1	Annual testing; program specifications					
Test Standards Description	Exhaust OBD Check	Evaporative Gas Cap and OBD Check	Identifies test type					
Test Standards ID	51	45	Identifies test with MOVES3.1 database test standards IDs					
I/M Compliance	93.90% for source source ty 70.67% for s	Expected compliance (%) - MOVES3.1 Default						

Table 17 (continued): I/M Descriptive Inputs for Subject Counties

2050					
Collin, Dallas, Denton, Ellis, Johnson, Kaufman, Parker, Rockwall, and Tarrant I/M Data					
I/M Program ID	20	24	Differentiates I/M programs		
Pollutant Process ID	101, 102, 201, 202, 301, 302	112	Identifies the pollutant and vehicle process		
Source Use Type	21, 31, 32	21, 31, 32	Identifies the vehicle type		
Begin Model Year	2026	2026	Model year I/M Program begins		
End Model Year	2048	2048	Model year I/M Program ends		
Inspection Frequency	1	1	Annual testing; program specifications		
Test Standards Description	Exhaust OBD Check	Evaporative Gas Cap and OBD Check	Identifies test type		
Test Standards ID	51	45	Identifies test with MOVES3.1 database test standards IDs		
I/M Compliance	93.90% for source type 21, 90.25% for source type 31 and 70.67% for source type 32		Expected compliance (%) - MOVES3.1 Default		

Table 18: MOVES Emissions Factor Post-Processing to Be Performed by County and Year

Strategy and Post-processing Result	Detail
Texas Low Emission Diesel Fuel (TxLED)	Not Applied ⁷ to all modeled counties

Table 19: Emissions Controls Used for Conformity Credit

Emission Reduction Strategy and Years Covered	Modeling or Post- Processing Approach	Analysis Year
Intersection Improvements	Post Processed	2026
Transit Service	Modeled	All
High Occupancy Vehicle/Managed Lanes	Modeled	All
Park-n-Ride Lots	N/A	N/A
Vanpools	N/A	N/A
Grade Separations	Modeled	All
Traffic Signal Improvements	N/A	N/A
Intelligent Transportation Systems	Post Processed	2026
Clean Vehicle Commitments	N/A	N/A
Bicycle/Pedestrian Facilities	Post Processed	2026
Employer Trip Reduction Programs	N/A	N/A
Sustainable Development	N/A	N/A
Public Education/Ozone Season Fare Reduction	N/A	N/A

Note: N/A = not applicable

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⁷ NCTCOG will not apply TxLED since using EPA's recent guidance will yield negligible benefits Page 21 of 21