



Draft
**Air Quality
Conformity
Determination**



Chicago Metropolitan
Agency for Planning

Purpose

MPO Policy Committee’s approval to release the 2026 RTP (All RCPs) and FFY 27-32 TIP (Conformity Determination) Plan Revision for public comment.

Transportation Conformity

Transportation Conformity is a requirement of the Clean Air Act section 176(c). Federal regulations contained in [40 CFR Part 93, Subpart A § 93.104](#) state that:

- (1) Each new transportation plan must be demonstrated to conform before the transportation plan is approved by the MPO or accepted by DOT.
- (2) All transportation plan amendments must be found to conform before the transportation plan amendments are approved by the MPO or accepted by DOT, unless the amendment merely adds or deletes exempt projects listed in §93.126 or §93.127. The conformity determination must be based on the transportation plan and the amendment taken as a whole.

The 2026 Regional Transportation Plan (RTP) and the FFY 2027-2032 Transportation Improvement Program (TIP) are required to have a conformity determination that is approved by the MPO Policy Committee. The 2026 RTP (All RCPs) and FFY 27-32 TIP (Conformity Determination) Plan Revision and this memo provides the information and support for a conformity determination.

2026 RTP (All RCPs) and FFY 27-32 TIP (Conformity Determination) Plan Revision

The 2026 Regional Transportation Plan (RTP) and the FFY 2027-2032 Transportation Improvement Program (TIP) must demonstrate they are fiscally constrained and conformed. This Plan Revision includes projects recommended as [Regional Capital Projects](#) in the draft 2026 RTP. There are 100 recommended RCPs included on this Plan Revision, 78 of which are not exempt from transportation conformity requirements and 22 that are exempt. There are also 4 projects included on this plan revision that had a conformity-related TIP change as shown in Table 1.

Table 1. Summary of projects included in plan revision

Type of project	# of projects
Total RCPs	100
RCPs that are not exempt from conformity	22
RCPs that are exempt from conformity	78
Non-RCPs included in Plan Revision	4
Total Projects included in Plan Revision	104

The 104 projects contained in this plan revision are not addressing just one issue or making one improvement but are addressing a multitude of issues and have complex scopes of work. What is shown in Table 2 is the primary improvement type associated with each project.

Table 2: Primary improvement type of projects included in the plan revision

Primary improvement type	# of Projects
Reconstruction/Resurfacing	11
Adding Travel Lanes	41
Interchange Improvements	8
Transit Modernization	6
Transit Capacity Increase	11
BRT and or Bus Priority Corridor	17
Intersection Improvements	4
New Train Station	4
Grade Separation	1
New Interstate	1
Total	104

CMAP’s [eTIP public website](#) displays information about projects on the plan revision. Projects submitted and analyzed as part of this plan revision can also be viewed on the public website under PLAN REVISIONS, by clicking on plan revision [CMAP/TIP 2027-2031/ 2026 RTP \(All RCPs\) and FFY 27-32 TIP \(Conformity Determination\) Plan Revision](#)

Emissions modeling

All 78 RCPs that are not exempt from transportation conformity requirements and the 4 projects in the TIP that submitted conformity TIP revisions were included in CMAP’s emissions modeling process. The regional travel demand model was updated to reflect updates to the modeling process and changes related to the 2026 RTP, such as a revised socioeconomic forecast. The travel demand model results, including vehicle miles traveled (VMT) by vehicle class, speed, time of day, and facility type were entered into the U.S. Environmental Protection Agency’s (U.S. EPA) MOVES4 model for emissions modeling.

The Chicago Nonattainment area is within the CMAP region and is classified as Serious Nonattainment for Ozone. Ozone is a gas that is formed by the reaction of Volatile Organic Compounds (VOC) and Oxides of Nitrogen (NO_x) in the atmosphere in the presence of sunlight (VOC and NO_x are referred to as ozone precursors). Illinois EPA has an approved State Implementation Plan (SIP) to reduce Ozone levels in the CMAP region to meet the current National Ambient Air Quality Standards (NAAQS). A revision to the SIP was approved in the Federal Register on May 14, 2026 (91 FR 27207) that included a revised Motor Vehicle Emissions budget (MVEB) for VOC and NO_x that CMAP needs to demonstrate conformity. Using MOVES4, CMAP modeled on-road emission estimates for ozone precursors VOC and NO_x in each analysis year that is required.

The emission analysis shown in the table below demonstrates that 2026 RTP and the FFY 2027-2032 TIP conform to the Motor Vehicle Emissions Budget for VOC and NO_x as required. The conformity modeling process CMAP used, and the emission results were discussed at an interagency consultation meeting on May 18, 2026, where support for CMAP’s process was given.

A public comment period for the 2026 RTP (All RCPs) and FFY 27-32 TIP (Conformity Determination) plan revision and this conformity determination will run concurrently with the draft 2026 RTP and draft FFY 2027-2032 TIP comment period from June 15 to July 31, 2026. Final consideration of these items is anticipated in October 2026.

VOC and NO_x Emissions in Tons per Summer Day for Ozone Conformity

Year	Volatile Organic Compounds		Nitrogen Oxides	
	Northeastern Illinois	SIP Budget	Northeastern Illinois	SIP Budget
2026	51.53	52.47	111.35	165.78
2030	44.13	52.47	68.15	165.78
2035	37.94	52.47	43.01	165.78
2040	32.98	52.47	34.60	165.78
2050	26.44	52.47	30.74	165.78

Conformity is demonstrated by comparison of analysis year emissions to the SIP budgets

Notes:

Off-model benefits are not included in the total emissions estimates

Results updated as of May 2026