

June 12, 2026

Ms. Amy Sherwood
Principal, Sikich
333 John Carlyle Street, Suite 500
Alexandria, VA 22314

Dear Ms. Sherwood:

MAG has completed its review of the final draft report of the Performance Audit of the Maricopa Association of Governments Regional Transportation Plan that we received on June 5, 2026. MAG appreciates the auditors' work and agrees that performance management is an important element of regional planning; however, several of the recommendations, while constructively received, would be impractical in execution. Specifically, MAG respectfully disagrees with the representation of the Transportation Performance Management framework (TPM) as a viable tool for establishing uniform project-level targets and goals. Further, the report mistakenly conflates the ability to measure project impact post-construction with the ability to produce credible and methodologically defensible targets.

The portfolio of transportation projects managed by a metropolitan planning organization (MPO) covers a broad spectrum, from individual crosswalk improvements to multi-billion dollar freeway infrastructure investments. Utilizing scarce transportation resources to collect the voluminous amounts of data needed to authentically measure the individual impact of the many hundreds of projects MAG undertakes is both impractical and prohibitively expensive. Further, MAG is unaware of any other MPO in the nation that attempts to set project-specific performance targets for all its projects. Transportation system performance is influenced by regional growth, land use, economic cycles, and traveler behavior, and these factors that cannot be isolated to individual projects with scientific defensibility. MAG will continue conducting post-implementation project evaluations as appropriate, consistent with federal TPM guidance

MAG remains committed to continuous improvement, transparency, and strengthening how performance information is communicated to policymakers and the public. Arizona Revised Statutes 28-6313 directs the performance audit to evaluate the regional transportation plan and the transportation system as a whole, which aligns with MAG's statutory role as the region's MPO. While the statute does not reference project-level target setting, MAG's system-level performance approach is consistent with the statute's focus and with established national MPO practice.

More Than 50 Years of Serving the Region

However, MAG prides itself on being on the leading edge of national best practices and does see an opportunity to further expand its comprehensive and federally compliant performance management efforts. While traditionally we review performance at the system-level, thus being inclusive of the many projects completed around the region, MAG recognizes that large-scale, high-capacity infrastructure investments *may* have a measurable regional impact conducive to target setting. MAG will endeavor to set data-driven, measurable, timebound targets for upcoming large-scale, high-capacity projects to further reinforce the value these transportation investments bring to the region. As this is the first planning cycle under Proposition 479, systemwide trend evaluation will appropriately emerge over time as new data becomes available. Other projects will continue to be assessed programmatically in accordance with federal guidance and consistent with standard MPO practice nationwide.

MAG's data program and regional travel demand model are widely recognized as among the most sophisticated in the nation, and MAG will continue to leverage these nationally regarded tools to advance performance informed planning. MAG's performance practices are strongly aligned with the federal TPM framework, which was deliberately designed as a system-level management tool, not a project-level forecasting mechanism. MAG's commitment to responsible stewardship of taxpayer dollars also requires that performance activities remain meaningful, scalable, and cost-effective, rather than diverting resources toward methodologies that are not nationally recognized or technically defensible.

Our agency has a long history of implementing prior audit recommendations, and we appreciate the constructive partnership of the Auditor General and her office throughout this process. We remain committed to strengthening transparency, improving documentation clarity, and reinforcing long-range performance expectations in future plan cycles, particularly as Proposition 479 enters its early implementation years and MAG continues to build the data foundation needed for long-range performance evaluation.

MAG again wants to thank you and your team for the efforts and recommendations on how MAG, along with our implementation partners, can continue to deliver improvements to the regional transportation system. As requested, please find our formal response to your finding and individual recommendations herein.

Sincerely,

A handwritten signature in black ink, appearing to read 'Audra Koester Thomas', written over a horizontal line.

Audra Koester Thomas
Executive Director

Chapter 3: MAG has opportunities to better demonstrate whether the regional transportation system and individual projects funded by the half-cent sales tax have achieved their intended outcomes by further incorporating key elements of performance management

MAG's response: The finding is agreed to.

Recommendation 1: Develop and implement a process for establishing system-wide objectives and targets for each of the goals and performance measures included in the 2025 RSTIIP.

MAG's response: The audit recommendation will be implemented in a different manner.

Response explanation: Chapter 8 of the MOMENTUM 2050 plan (referred to by the auditors as the 2025 RSTIIP) already provides the systemwide performance metrics and modeled outcomes for each RTP goal. This includes the industry-standard “with-investment” and “without-investment” scenario comparisons, which MPOs nationwide use to evaluate and communicate long-range system performance expectations. Collectively, these modeled outcomes represent the RTP’s systemwide performance expectations and reflect established federal and MPO best practice. MAG agrees that the linkage between goals, performance measures, and modeled outcomes can be made more explicit for readers. Accordingly, MAG will enhance the clarity of the planned-investment scenario presentation to more directly illustrate how the forecasted outcomes support the adopted goals and performance measures. As this is the first RTP/RSTIIP under Proposition 479, longitudinal outcome tracking is not yet possible. However, MAG will incorporate longitudinal tracking in future RTP updates as data becomes available. To further strengthen long-range transparency, MAG will reinforce systemwide performance expectations directly within the RTP, ensuring it continues to serve as the region’s definitive long-range performance framework under Proposition 479.

Recommendation 2: Develop and implement a system-wide performance monitoring process that ties directly to the goals, performance measures, and targets identified in the 2025 RSTIIP.

MAG's response: The audit recommendation will be implemented in a different manner.

Response explanation: The conclusion that MAG lacks a systemwide performance monitoring process overlooks the substantial monitoring framework already in place. The key performance metrics presented in Chapter 8 of MOMENTUM 2050 were deliberately developed to support repeatable, system-level monitoring over time, using industry standard modeling and performance analysis techniques. These metrics were selected precisely because they are measurable, reproducible, and suitable for long range trend evaluation at the regional scale. MAG already publishes annual systemwide performance reporting through its System Performance Report, which includes federal target tracking, Congestion Management Process updates, and trend analysis of key RTP measures. Several RTP metrics are already monitored and publicly reported through this process. MAG agrees to make the alignment between these reported measures and the RTP goals more explicit in future publications. Because this is the first RTP/RSTIIP under Proposition 479, Proposition 479 specific trend monitoring is not yet possible. MAG will incorporate systemwide performance trends and outcomes into future RTP updates as real-world data becomes

available. This approach ensures that performance monitoring occurs at the correct scale—the regional transportation system—where multi-year trends, rather than single year fluctuations, provide meaningful insight into the effectiveness of long-range infrastructure investments.

Recommendation 3: Develop and implement a process for implementing partners and member agencies which requires project documentation to explicitly identify project-specific goal(s), objective(s), performance measure(s), metric(s), and target(s).

MAG's response: The audit recommendation will be implemented in a different manner.

Response explanation: MAG will work with implementing partners and member agencies to ensure future project submissions include clear and consistent information on project goals, the performance measures the project may influence, and the systemwide goals each project supports. MAG will also expand existing TIP submittal practices to incorporate the key performance metrics identified in the MOMENTUM 2050 RTP, creating a more uniform and transparent submittal process. However, we want to emphasize that MAG is unaware of any MPO that requires project-specific, quantitative performance targets for *all* of the diverse and multi-faceted projects within their purview. The methodology implied in the audit report misinterprets the purpose and design of the Transportation Performance Management (TPM) program. TPM was created to establish a baseline, system-level performance framework for state DOTs, not to serve as a project-level target setting tool. Applying it in that manner is inconsistent with national practice and with Congress' and FHWA's intent. Unlike TPM reporting, MAG already applies performance data directly and meaningfully in its RTP development and project selection processes. MAG will require consistent project documentation upon submission while reserving detailed, target-based performance assessments for large-scale, high-capacity projects where measurement is meaningful, feasible, technically defensible, and aligned with best practices. This ensures credible, authentic performance monitoring without imposing unrealistic or non-actionable requirements on implementing partners. It should also be noted that this recommendation extends well beyond major MPO practice across nationwide; project-level performance monitoring is not part of the FHWA TPM framework nor is it a federal expectation. MAG will therefore focus ongoing project performance assessments on major projects, applying monitoring timelines that reflect each project's scale, complexity, and data feasibility rather than imposing a one-size-fits-all requirement and across the entire RTP portfolio.

Recommendation 4: Develop and implement a process for implementing partners and member agencies which requires project documentation to explicitly identify the system-wide goal(s) the project supports.

MAG's response: The audit recommendation will be implemented.

Response explanation: MAG already identifies the federal performance measures supported by each project through its Transportation Improvement Program. MAG will expand this practice to include the key performance metrics identified in the MOMENTUM 2050 RTP, ensuring clearer and more consistent alignment between individual projects and the systemwide goals they support.

Recommendation 5: Develop and implement a process for implementing partners and member agencies which requires project documentation to explicitly identify reasonable project milestones or timelines to assess progress toward identified goals and targets.

MAG's response: The audit recommendation will be implemented in a different manner.

Response explanation: MAG agrees that large-scale projects and programs—where the scope, cost, data availability, and regional impact justify a detailed performance approach—should be assessed at regular intervals. MAG will therefore establish project-specific assessment timelines for major investments, using measurement strategies that are technically sound, feasible, and aligned with national best practice. However, establishing project-specific metrics and targets for every project in the RTP is impractical, inauthentic, prohibitively expensive, and would not produce reliable or actionable information. This recommendation also extends well beyond major MPO practice nationwide; moreover, project-level performance monitoring is not the standard practice referenced in FHWA's Transportation Performance Management framework. MAG will instead focus its ongoing project performance assessments on major projects and programs, applying monitoring timelines that reflect each project's individual scale, complexity, and data feasibility rather than imposing a one-size-fits-all timeline and measurement requirement across the entire RTP portfolio.