

5. EMISSIONS FACTOR ESTIMATION

A regional emissions analysis must be conducted for multiple analysis years to satisfy the requirements of 40 CFR Part 93.109 of the conformity rule for ozone nonattainment areas. Specifically, the regional emissions analysis is used to conduct the emission budget test (or interim emission tests) and to determine any contributions to emission reductions. The procedures for determining regional transportation-related emissions are described in [40 CFR Part 93.118](#) of the conformity rule. The following sections discuss the analysis years, and a description of the modeling processes used to conduct the analysis.

5.1 EMISSIONS FACTOR ESTIMATION MODEL

According to [40 CFR 93.111](#) of the conformity rule, the determination must be based on the latest emission estimation model. The EPA released the MOVES model, MOVES3.1 that was released in 2021, with an effective date January 7, 2021. The grace period to use MOVES3 for conformity analysis ends on September 12, 2025.

As outlined in the Pre-Analysis Consensus Plan (PACP), included in Appendix F.1 – Approved PACP, the Interagency Consultation Partners approved the use of MOVES3.1 to develop 2026, 2035, 2040, and 2050 vehicle emission factors. Emission factors are one component to determine VOC and NO_x emissions from the region’s on-road vehicles.

MOVES3.1 input parameters are listed in Table 5 1 through Table 5 9 with the appropriate data source and/or methodology applied. The information listed applies to all counties and analysis years unless otherwise specified.

Table 5-1. MOVES Input Parameters and data source

| 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 |

| Input Parameter Name | Description | Source |
|---|--|---|
| 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 | Input fuel engine fractions (i.e. Gasoline vs. Diesel Engine 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 5-2. Fuel Supply

| Fuel Formulation ID | Market Share | Market Share CV ⁷ |
|---------------------|--------------|------------------------------|
| 2678 | 1 | 0 |
| 30600 | 1 | 0 |

Table 5-3. Fuel Properties

| 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 |

Note: N/A = not applicable

⁷ Market Share CV – the coefficient variation of the market share
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Table 5-4. Meteorological Data - 2011 Summer Hourly Temperatures(°F)

| Hour | Collin | Dallas | Denton | Ellis | Johnson | Kaufman | Parker | Rockwall | Tarrant | Wise |
|-----------------------|--------|--------|--------|-------|---------|---------|--------|----------|---------|--------|
| 00:00 a.m.–01:00 a.m. | 85.18 | 85.18 | 85.18 | 85.18 | 85.55 | 85.18 | 85.55 | 85.18 | 85.55 | 85.55 |
| 01:00 a.m.–02:00 a.m. | 84.01 | 84.01 | 84.01 | 84.01 | 84.40 | 84.01 | 84.40 | 84.01 | 84.40 | 84.40 |
| 02:00 a.m.–03:00 a.m. | 82.97 | 82.97 | 82.97 | 82.97 | 83.06 | 82.97 | 83.06 | 82.97 | 83.06 | 83.06 |
| 03:00 a.m.–04:00 a.m. | 81.91 | 81.91 | 81.91 | 81.91 | 81.82 | 81.91 | 81.82 | 81.91 | 81.82 | 81.82 |
| 04:00 a.m.–05:00 a.m. | 80.79 | 80.79 | 80.79 | 80.79 | 80.87 | 80.79 | 80.87 | 80.79 | 80.87 | 80.87 |
| 05:00 a.m.–06:00 a.m. | 79.73 | 79.73 | 79.73 | 79.73 | 79.56 | 79.73 | 79.56 | 79.73 | 79.56 | 79.56 |
| 06:00 a.m.–07:00 a.m. | 78.85 | 78.85 | 78.85 | 78.85 | 78.64 | 78.85 | 78.64 | 78.85 | 78.64 | 78.64 |
| 07:00 a.m.–08:00 a.m. | 80.01 | 80.01 | 80.01 | 80.01 | 79.29 | 80.01 | 79.29 | 80.01 | 79.29 | 79.29 |
| 08:00 a.m.–09:00 a.m. | 82.83 | 82.83 | 82.83 | 82.83 | 82.76 | 82.83 | 82.76 | 82.83 | 82.76 | 82.76 |
| 09:00 a.m.–10:00 a.m. | 86.30 | 86.30 | 86.30 | 86.30 | 86.59 | 86.30 | 86.59 | 86.30 | 86.59 | 86.59 |
| 10:00 a.m.–11:00 a.m. | 89.61 | 89.61 | 89.61 | 89.61 | 89.88 | 89.61 | 89.88 | 89.61 | 89.88 | 89.88 |
| 11:00 a.m.–12:00 p.m. | 92.62 | 92.62 | 92.62 | 92.62 | 93.30 | 92.62 | 93.30 | 92.62 | 93.30 | 93.30 |
| 12:00 p.m.–13:00 p.m. | 95.10 | 95.10 | 95.10 | 95.10 | 95.90 | 95.10 | 95.90 | 95.10 | 95.90 | 95.90 |
| 13:00 p.m.–14:00 p.m. | 97.02 | 97.02 | 97.02 | 97.02 | 97.72 | 97.02 | 97.72 | 97.02 | 97.72 | 97.72 |
| 14:00 p.m.–15:00 p.m. | 98.43 | 98.43 | 98.43 | 98.43 | 99.34 | 98.43 | 99.34 | 98.43 | 99.34 | 99.34 |
| 15:00 p.m.–16:00 p.m. | 99.36 | 99.36 | 99.36 | 99.36 | 100.26 | 99.36 | 100.26 | 99.36 | 100.26 | 100.26 |
| 16:00 p.m.–17:00 p.m. | 99.83 | 99.83 | 99.83 | 99.83 | 100.72 | 99.83 | 100.72 | 99.83 | 100.72 | 100.72 |
| 17:00 p.m.–18:00 p.m. | 99.57 | 99.57 | 99.57 | 99.57 | 100.42 | 99.57 | 100.42 | 99.57 | 100.42 | 100.42 |
| 18:00 p.m.–19:00 p.m. | 98.38 | 98.38 | 98.38 | 98.38 | 99.30 | 98.38 | 99.30 | 98.38 | 99.30 | 99.30 |
| 19:00 p.m.–20:00 p.m. | 96.03 | 96.03 | 96.03 | 96.03 | 97.18 | 96.03 | 97.18 | 96.03 | 97.18 | 97.18 |
| 20:00 p.m.–21:00 p.m. | 92.57 | 92.57 | 92.57 | 92.57 | 93.54 | 92.57 | 93.54 | 92.57 | 93.54 | 93.54 |
| 21:00 p.m.–22:00 p.m. | 89.93 | 89.93 | 89.93 | 89.93 | 90.73 | 89.93 | 90.73 | 89.93 | 90.73 | 90.73 |
| 22:00 p.m.–23:00 p.m. | 88.10 | 88.10 | 88.10 | 88.10 | 88.71 | 88.10 | 88.71 | 88.10 | 88.71 | 88.71 |
| 23:00 p.m.–00:00 a.m. | 86.49 | 86.49 | 86.49 | 86.49 | 86.90 | 86.49 | 86.90 | 86.49 | 86.90 | 86.90 |

Table 5-5. Meteorological Data - 2011 Summer Hourly Relative Humidity Data (%)

| Hour | Collin | Dallas | Denton | Ellis | Johnson | Kaufman | Parker | Rockwall | Tarrant | Wise |
|-----------------------|--------|--------|--------|-------|---------|---------|--------|----------|---------|-------|
| 00:00 a.m.–01:00 a.m. | 50.15 | 50.15 | 50.15 | 50.15 | 46.12 | 50.15 | 46.12 | 50.15 | 46.12 | 46.12 |
| 01:00 a.m.–02:00 a.m. | 52.90 | 52.90 | 52.90 | 52.90 | 49.02 | 52.90 | 49.02 | 52.90 | 49.02 | 49.02 |
| 02:00 a.m.–03:00 a.m. | 55.75 | 55.75 | 55.75 | 55.75 | 52.67 | 55.75 | 52.67 | 55.75 | 52.67 | 52.67 |
| 03:00 a.m.–04:00 a.m. | 58.76 | 58.76 | 58.76 | 58.76 | 56.13 | 58.76 | 56.13 | 58.76 | 56.13 | 56.13 |
| 04:00 a.m.–05:00 a.m. | 61.87 | 61.87 | 61.87 | 61.87 | 58.63 | 61.87 | 58.63 | 61.87 | 58.63 | 58.63 |
| 05:00 a.m.–06:00 a.m. | 64.62 | 64.62 | 64.62 | 64.62 | 61.78 | 64.62 | 61.78 | 64.62 | 61.78 | 61.78 |
| 06:00 a.m.–07:00 a.m. | 67.70 | 67.70 | 67.70 | 67.70 | 64.12 | 67.70 | 64.12 | 67.70 | 64.12 | 64.12 |
| 07:00 a.m.–08:00 a.m. | 66.62 | 66.62 | 66.62 | 66.62 | 63.75 | 66.62 | 63.75 | 66.62 | 63.75 | 63.75 |
| 08:00 a.m.–09:00 a.m. | 61.31 | 61.31 | 61.31 | 61.31 | 57.63 | 61.31 | 57.63 | 61.31 | 57.63 | 57.63 |
| 09:00 a.m.–10:00 a.m. | 54.11 | 54.11 | 54.11 | 54.11 | 50.25 | 54.11 | 50.25 | 54.11 | 50.25 | 50.25 |
| 10:00 a.m.–11:00 a.m. | 47.49 | 47.49 | 47.49 | 47.49 | 43.90 | 47.49 | 43.90 | 47.49 | 43.90 | 43.90 |
| 11:00 a.m.–12:00 p.m. | 41.71 | 41.71 | 41.71 | 41.71 | 37.73 | 41.71 | 37.73 | 41.71 | 37.73 | 37.73 |
| 12:00 p.m.–13:00 p.m. | 37.19 | 37.19 | 37.19 | 37.19 | 33.36 | 37.19 | 33.36 | 37.19 | 33.36 | 33.36 |
| 13:00 p.m.–14:00 p.m. | 33.77 | 33.77 | 33.77 | 33.77 | 30.55 | 33.77 | 30.55 | 33.77 | 30.55 | 30.55 |
| 14:00 p.m.–15:00 p.m. | 31.20 | 31.20 | 31.20 | 31.20 | 27.84 | 31.20 | 27.84 | 31.20 | 27.84 | 27.84 |
| 15:00 p.m.–16:00 p.m. | 29.42 | 29.42 | 29.42 | 29.42 | 26.27 | 29.42 | 26.27 | 29.42 | 26.27 | 26.27 |
| 16:00 p.m.–17:00 p.m. | 28.42 | 28.42 | 28.42 | 28.42 | 25.32 | 28.42 | 25.32 | 28.42 | 25.32 | 25.32 |
| 17:00 p.m.–18:00 p.m. | 28.30 | 28.30 | 28.30 | 28.30 | 25.17 | 28.30 | 25.17 | 28.30 | 25.17 | 25.17 |
| 18:00 p.m.–19:00 p.m. | 29.47 | 29.47 | 29.47 | 29.47 | 26.04 | 29.47 | 26.04 | 29.47 | 26.04 | 26.04 |
| 19:00 p.m.–20:00 p.m. | 32.42 | 32.42 | 32.42 | 32.42 | 28.45 | 32.42 | 28.45 | 32.42 | 28.45 | 28.45 |
| 20:00 p.m.–21:00 p.m. | 37.26 | 37.26 | 37.26 | 37.26 | 32.77 | 37.26 | 32.77 | 37.26 | 32.77 | 32.77 |
| 21:00 p.m.–22:00 p.m. | 41.36 | 41.36 | 41.36 | 41.36 | 36.64 | 41.36 | 36.64 | 41.36 | 36.64 | 36.64 |
| 22:00 p.m.–23:00 p.m. | 44.22 | 44.22 | 44.22 | 44.22 | 39.91 | 44.22 | 39.91 | 44.22 | 39.91 | 39.91 |
| 23:00 p.m.–00:00 a.m. | 47.42 | 47.42 | 47.42 | 47.42 | 43.27 | 47.42 | 43.27 | 47.42 | 43.27 | 43.27 |

**Table 5-6. Meteorological Data 2011 Summer 24-hr Barometric Pressure Data
(Inches of Mercury- inHg)**

| 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 |

Table 5-7. I/M Descriptive Inputs for Subject Counties

| 2026 | | | |
|--|---|-----------------------------------|---|
| Collin, Dallas, Denton, Ellis, Johnson, Kaufman, Parker, Rockwall, and Tarrant I/M Data ⁸ | | | |
| 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 | 2002 | 2002 | Model year I/M Program begins |
| End Model Year | 2024 | 2024 | 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 |

Note: Begin Model Year and End Model Year define the range of vehicle model years covered by I/M program.

⁸ Wise County does not have I/M program.
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Table 5-7 (continued): I/M Descriptive Inputs for Subject Counties

| 2035 | | | |
|---|---|-----------------------------------|---|
| 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 | 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 type 21, 90.25% for source type 31, and 70.67% for source type 32 | | Expected compliance (%) - MOVES3.1 Default |

Note: Begin Model Year and End Model Year define the range of vehicle model years covered by I/M program.

Table 5-7 (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 type 21, 90.25% for source type 31, and 70.67% for source type 32 | | Expected compliance (%) - MOVES3.1 Default |

Note: Begin Model Year and End Model Year define the range of vehicle model years covered by I/M program.

Table 5-7 (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 |

Note: Begin Model Year and End Model Year define the range of vehicle model years covered by I/M program

Table 5-8. 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 ⁹ to all modeled counties |

Table 5-9. Emission Controls 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. Conformity Credits from strategies listed as ‘Post Processed’ are provided solely for informational purposes and are not applied to the regional emissions totals.

⁹ TxLED will not be applied since using EPA’s recent guidance will yield negligible benefits
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5.2 MODELED EMISSION ESTIMATES

Modeled emission estimates are calculated using TTI emission inventory estimation utilities using moves: MOVES3Utils, developed by TTI for MOVES. This utility combines vehicle activity and emissions factors to create emission estimates at the link level.

5.2.1 Vehicle Registration Distribution

Vehicle registration (age) distributions were developed using the latest available TxDMV analysis year-specific county vehicle registration data. 2021 data was used for the analysis years 2026, 2035, 2040, and 2050. MOVES defaults were used where the required information was not available in the TxDMV data.

The input values for each vehicle class are 31 age fractions representing the fraction of vehicles by age for that vehicle class as of December of the evaluation year. These age fractions start with the evaluation year as the 1st age fraction and work back in annual increments to end with the 31st fraction, which represents the fraction of vehicles of age 30 years and older. The fractions are calculated as the model-year-specific registrations in a class divided by the total vehicles registered in that class.

5.2.2 Alternative Fuel Vehicle Technology

Alternative Fuel Vehicle Technology (AVFT) fractions were developed using the latest available TxDMV analysis year-specific county vehicle registration data. 2021 data was used for the analysis years 2026, 2035, 2040, and 2050. MOVES defaults were used where the required information was not available in the TxDMV data.

TTI developed the evaluation year-specific local diesel fractions for the MOVES single unit and combination truck source use types using the latest TxDMV data, for all analysis years, aggregated to the statewide level. For all source types, Compressed Natural Gas (CNG) and electricity fractions were set to zero and the gasoline/diesel/flex-fuel fractions were normalized (sum to 1.0) for each source type and model year. Fuel usage for flex-fuel vehicles was set to 100% gasoline (in the fuel usage fraction input table).

5.2.3 VMT Mix

VMT mix (or fractions) is very important to be able to estimate link emissions. The VMT mix is applied to the emission factors in a post-process methodology. The VMT mix enables the assignment of emission factors by vehicle type to VMT to calculate emissions on a specified roadway facility or functional class. VMT mix is estimated for four MOVES roadway types: Rural Restricted (rural freeways), Rural Unrestricted (rural arterials and collectors), Urban Restricted (urban freeways), and Urban Unrestricted (urban arterials and collectors) for daily time periods for each of the modeled counties. Each county's roadway sections are classified as rural or urban by the vehicle activity behavior and the demographics of the county. The VMT

mix methodology utilizes data, assumptions, and procedures from the TxDOT, TTI, and the Dallas Fort Worth region TDM.

Consistent with the prior analysis, the VMT mixes were produced in five-year increments and applied to analysis years as follows:

- 2015 VMT mix – for 2013 through 2017 analysis years,
- 2020 VMT mix – for 2018 through 2022 analysis years,
- 2025 VMT mix – for 2023 through 2027 analysis years, etc.

Using the latest available vehicle classification counts 2013-2021 and MOVES3.1 defaults, TTI estimated the time-of-day (AM Peak, Mid-Day, PM Peak, Overnight) VMT mixes by the four MOVES road types. No seasonal adjustments are made for VMT mix.