

JULIE WILLOUGHBY  
MAJORITY WHIP  
1700 WEST WASHINGTON, SUITE H  
PHOENIX, ARIZONA 85007-2844  
CAPITOL PHONE: (602) 926-4153  
TOLL FREE: 1-800-352-8404  
jwilloughby@azleg.gov

DISTRICT 13



COMMITTEES:  
APPROPRIATIONS  
ARTIFICIAL INTELLIGENCE &  
INNOVATION  
RULES

ETHICS  
LEGISLATIVE COUNCIL

## Arizona State Legislature

March 27, 2026

Matthew Poppen  
Director of Environmental Planning  
Maricopa Association of Governments  
302 N. First Ave., Suite 200  
Phoenix Arizona, AZ 85003  
[MPoppen@azmag.gov](mailto:MPoppen@azmag.gov)

**RE: Response to Preliminary Modeling Showing No Change in Ozone Concentrations from Switching from Arizona Cleaner Burning Gas with 7.0 RVP to Federal Reformulated Gasoline with 7.4 RVP, and Request to Model Federal Reformulated Gasoline with 7.8 RVP.**

Director Poppen,

Thank you for working with me to address the state's higher cost of gasoline and for conducting the fuel blend-emissions modeling I requested in February. As you recall, I requested the Environmental Division to model the ozone impacts of changing the state's higher-cost boutique blend of fuel with a Reid Vapor Pressure (RVP) of 7.0 pounds per square inch (psi) to either: (a) Federal Reformulated Gasoline with a RVP of 7.4 psi; or (b) Conventional Gasoline with RVP of 9.0 psi—keeping all else equal and utilizing the 2023 modeling year with the federal government's recognition of international transport from Asia and Mexico.

On March 3, you provided MAG's preliminary evaluation of the change in mobile source emissions, and on March 13, you provided MAG's updated analysis including the impacts of those changes on ozone concentration. **As a result of these analyses, MAG's mobile source emissions modeling demonstrated that switching from our current blend of 7.0 RVP to a more widely available and less-costly-to-produce option of 7.4 RVP would result in *little to no change* in air quality impacts in the Maricopa County area, thereby suggesting that a request to revise our State Implementation Plan to effectuate this change may be both supported by evidence and approved the federal Environmental Protection Agency.** The key findings were as follows:

**Comprehensive Air Quality Model with Extensions (CAMx v7.32) Results –** *No change* in the reported 2023 DVA occurs at any monitoring site, with the maximum 2023 DVA remaining at 80.00 ppb at the Mesa and JLG Supersite monitoring sites.

**Community Multiscale Air Quality (CMAQ v5.5) Results –** *A maximum impact of 0.01 ppb* is predicted at three sites: Falcon Field, South Scottsdale, and High School.

These results present good news for the millions of Arizonans in Maricopa and Pinal counties who have been asking for solutions to Arizona's rising costs and fuel supply challenges—providing a tangible step toward addressing our state's costly boutique fuel blend and supply resiliency issues in a way that is both supported by science and consistent with federal air quality regulations.

And because you sent a copy of your positive results to the Arizona Department of Environmental Quality and the Weights and Measures Services Division of the Arizona Department of Agriculture, Governor Hobbs should now be aware of the findings and could take action at any time to submit a revision request to the federal government, if she wanted to.

In the spirit of these results, I would like to discuss the following during our follow-up meeting on Monday, March 30, 2026: next steps for utilizing these findings, including explaining the process for submitting a State Implementation Plan revision, identifying who is responsible for or has the authority to submit such a request, and detailing the minimum pieces of information that must be included with the request to support the change and obtain a favorable outcome.

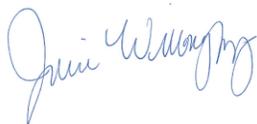
Additionally, as I have continued to work on this issue, I have learned of another blend of reformulated gasoline that is or may have been used in parts of other western states—including Colorado, Utah, and Texas—that has an **RVP of 7.8 psi**.

Although these states are located in different Petroleum Administration Defense Districts (PADDs) than Arizona (Arizona is in PADD 5, Utah and Colorado are in PADD 4, and Texas is in PADD 3), and, to the best of my understanding, Federal Reformulated Gasoline of 7.8 RVP has not been authorized in PADD 5—the fact that these PADDs are adjacent to Arizona, share some of the same interstate oil and gas infrastructure, and are served by some of the same multinational oil and gas companies makes one wonder whether: (a) the blends available in those PADDs could be made available to Arizona; and (b) whether, if they could be made available, bringing them into our state could help to alleviate both Arizona's gas cost and supply assurance challenges.

**Accordingly, for our Monday meeting, I would also like to discuss the process of approving a new blend in a PADD and respectfully request MAG to conduct additional mobile source emissions modeling for Federal Reformulated Gas of RVP 7.8.**

I look forward to our meeting on Monday and again appreciate your willingness to work with me as we seek to achieve an affordable and abundant fuel supply for Arizona families.

Respectfully,



Julie Willoughby  
Representative, Legislative District 13  
Arizona House of Representatives

