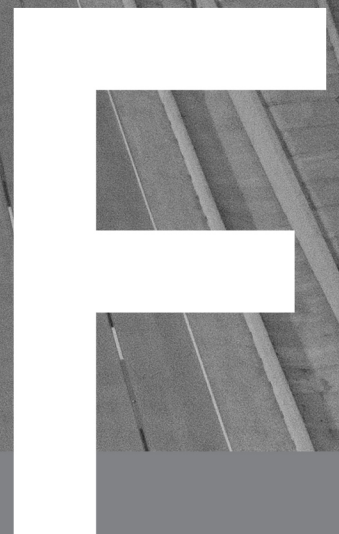


APPENDIX: INTERAGENCY CONSULTATION



Transportation Conformity Pre-Analysis Consensus Plan

EL PASO METROPOLITAN PLANNING ORGANIZATION



PACP Submission Information

Prepared by	El Paso Metropolitan Planning Organization
Meeting Date	Purpose of Meeting
12/14/2023	Present to the Consultation Partners the Pre-Consensus Plan for review

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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
	a. New Metropolitan/Regional Transportation Plan (demographics, horizon year, etc.)	
X	b. Modify Existing Metropolitan/Regional Transportation Plan (interim year adjustments)	2022-2050
X	c. New or Amended Transportation Improvement Program	2023-2026
	d. State Implementation Plan (SIP) Requirements	
	e. Newly Designated Non-Attainment Area	
	f. Other	

A. Explanation:

The El Paso Metropolitan Planning Organization (EPMPO) is proposing an amendment to the current RMS 2050 Metropolitan Transportation Plan (MTP) (approved on November 4, 2022). The Transportation Policy Board (TPB) approved several proposed changes to the RMS 2050 MTP.

B. Non-attainment status:

The City of El Paso (1991 city limits) is in non-attainment for particulate matter of 10 microns (Effective on January 6, 1991) and a portion of Doña Ana County near Sunland Park, NM is marginal non-attainment for 2015 Ozone NAAQS (Effective on June 4, 2018).

Effective December 30, 2021, EPA expanded the Sunland Park 2015 Ozone NAAQS marginal non-attainment area to include El Paso County. On June 30, 2023, the U.S. Court of Appeals for the District of Columbia Circuit ("D.C. Circuit") issued a decision that reversed EPA's designation of El Paso County as marginal non-attainment for the 2015 Ozone NAAQS. Currently, EPA is evaluating response options to this D.C. Circuit decision. The interagency partners have elected to evaluate El Paso County NOx and VOC emissions as part of this conformity analysis in case EPA issues a nonattainment designation for El Paso County in response to the D.C. Circuit decision before completion of this conformity process.

For this conformity determination, regional emissions analysis for Carbon Monoxide (CO) will not be conducted based upon the EPA approval of the El Paso CO Limited Maintenance Plan (LMP) in September 2017. In accordance with CO LMPs a regional emissions analysis for analysis years beyond 2020 is not required. The Travel Demand Model (TDM) has a conformity base year of 2017 and was developed with analysis years of 2022, 2032, 2040, and 2050. Since there are no adequate or approved budgets for the

Doña Ana County ozone nonattainment area, an interim emissions test will be used. And an interim emissions test year (2027) has been included to satisfied the conformity rule's interim emissions test requirement (40 CFR 93.119(g)(1) the first analysis year must be no more than five years beyond the year in which the conformity determination is being made. Demographics Control totals for the MPO area have been developed for the stated analysis years based on Texas Demographic Center projections (Table 7). The TIP will cover the Fiscal Years (FY) 2023-2026.

C. Projects to be amended:

1. MESA PARK DR. FROM I-10 TO MESA ST. (A126X-CAP)

Mesa Park project will be replaced with Montecillo Blvd. extension from I-10 to Montecillo Blvd. The project description will be the same - Build 4-Lane Divided. The only difference is the alignment. Montecillo Blvd. is connected to Mesa St. approximately half a mile north of Mesa Park Dr. The project will be connected at the same location on the IH-10 end.

2. DOWNTOWN 10 EXECUTIVE CENTER TO SL478 COPIA (I063X-CAP)

Project description will be updated to remove the adaptive lane in each direction and detail coding will be updated to follow preferred alternative with proposed frontage roads and ramps.

3. ST. FRANCIS DRIVE EXTENSION FROM PETE DOMENICI MEMORIAL HWY (NM 136) TO SUNLAND PARK EXTENSION (A606X)

St. Francis Drive extension project will be replaced with Border Highway Connector with four lane (4LN) principal arterial instead of a two lane (2LN) major collector as it was coded in the RMS 2050. The project limits will also change at the eastern end to McNutt Blvd. (NM 213) instead of Sunland Park Extension.

4. I-10 SEG3A from Copia to Paisano (I064X-CAP)

Project description will be updated to remove the adaptive lane in each direction and model coding will be updated accordingly.

5. I-10 SEG3B from Paisano to Airway (I065X-CAP)

Project description will be updated to remove the adaptive lane in each direction and model coding will be updated accordingly.

6. I-10 SEG1G from Thorn to Executive (I067X-CAP)

Project description will be updated to remove the adaptive lane in each direction and model coding will be updated accordingly.

7. I-10 SEG3C from Airway to Yarbrough (I068X-CAP)

Project description will be updated to remove the adaptive lane in each direction and model coding will be updated accordingly.

8. I-10 SEG3D1 from Yarbrough to FM659 (I069X-CAP)

Project description will be updated to remove the adaptive lane in each direction and model coding will be updated accordingly.

9. I-10 SEG3D2 from FM659 to Eastlake (I070X-CAP)

Project description will be updated to remove the adaptive lane in each direction and model coding will be updated accordingly.

Additional Model Updates

Technical Memorandum will be provided as an Appendix in the Transportation Conformity Report. Including in the model updates is the following project:

US 62/180 MONTANA AVE. EXPRESSWAY & FRONTAGE ROADS, PHASE I (F407A-CAP)

Phase I of Montana Ave. is a project in the previous MTP (Amended Destino 2045 MTP). The project was coded in the 2022 network for the RMS 2050 MTP as a completed project but it has not been open to the public due to several unforeseen complications. The project will be moved to the 2032 network as a clean-up of the TDM network coding and will now be in the same network year as Phase II (F407B-CAP). Phase II is a project in the RMS 2050 MTP.

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	12/01/2023 – 04/05/2024
2	Travel Model Networks Development and Emissions Analysis	12/01/2023 - 03/25/2024
3	Regional Technical and Policy Board Information	12/15/2023 – 06/21/2024
4	Public Meetings and Comment Period	04/15/2024 -05/14/2024
5	Consultative Partner Review Period	06/21/2024 - 10/15/2024
6	USDOT Air Quality Conformity Determination Anticipated	10/15/2024
7	Deadline for MTP Update	11/04/2026

3 METROPOLITAN TRANSPORTATION PLAN (MTP) OR REGIONAL TRANSPORTATION PLAN (RTP) / TRANSPORTATION IMPROVEMENT PROGRAM (TIP)

Table 3. MTP or RTP / TIP

Plan / Program Name	Years Covered	Fiscally Constrained
Amended RMS 2050 Metropolitan Transportation Plan	2022-2050	Yes
RMS Transportation Improvement Program	2023-2026	Yes

3.1 DEFINITION OF REGIONALLY SIGNIFICANT PROJECTS (FROM 40 CFR § 93.101)

A regionally significant project means a transportation project (other than projects that may be grouped in the TIP and/or Statewide Transportation Improvement Program (STIP) or exempt projects as defined in EPA's transportation conformity regulation [40 CFR § part 93]) is a facility that serves regional transportation needs (such as 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, or 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.

4 APPLICABLE STATE IMPLEMENTATION PLAN (SIP), RELATED EMISSIONS BUDGET, AND TRANSPORTATION CONTROL MEASURES (TCM)

Table 4. Applicable SIP and Emissions Budget(s)

SIP	Area Boundary	Pollutant	Emission Budget (TPD)
1987 PM ₁₀ SIP	El Paso (1991 city limits)	PM ₁₀	12.05
1-hour Ozone SIP ¹	El Paso County	VOC	36.23
1-hour Ozone SIP ¹	El Paso County	NO _x	39.76
N/A ²	Sunland Park (a portion of Doña Ana County near Sunland Park, NM)	VOC	N/A
N/A ²	Sunland Park (a portion of Doña Ana County near Sunland Park, NM)	NO _x	N/A

¹ The interagency partners have elected to evaluate El Paso County NO_x and VOC emissions as part of this conformity analysis in case EPA issues a nonattainment designation for El Paso County in response to the D.C. Circuit decision before completion of this conformity process. The VOC and NO_x budget is based on the 1996 one-hour ozone SUPER SIP.

² Since there are no adequate or approved budgets for the Doña Ana County ozone nonattainment area, an interim emissions test will be used.

Table 5. TCM strategies, if applicable.

#	TCM	Strategies	Effective Date
1	TCM	N/A	N/A

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

Variable	Information
Baseline Conformity Year, if applicable.	2017 ¹
Attainment Year	N/A ^{1,2}
Analysis Years	2022, 2027 ³ , 2032, 2040, and 2050
TIP year(s)	2023-2026
Last Year of Maintenance Plan (if applicable)	N/A
Other	N/A

¹Since there are no adequate or approved budgets for the Doña Ana County ozone nonattainment area, an interim emissions test will be used.

²Attainment years for the 1987 PM10 NAAQS and the 2015 Ozone NAAQS marginal classification predate the years covered by the MTP and TIP, and therefore will not be evaluated as an analysis year.

³An interim emissions test year (2027) has been included to satisfied the conformity rule's interim emissions test requirement (40 CFR 93.119(g)(1) the first analysis year must be no more than five years beyond the year in which the conformity determination is being made.

6 DEMOGRAPHIC USED IN CONFORMITY ANALYSIS

Table 7. Demographics

(If using data other than the latest available (i.e., 2020 US Census), please include an explanation.)

Variables	Forecasting method
Population	At the TAZ level, the data was gathered from a mixture of sources, including public domain data sources, published commercial datasets, stakeholder input via the Delphi Process, table-top GIS analysis, and limited field review of the study area. To allocate demographics to the TAZ level, 2017 population and household estimates were developed at the block level. The county control total for household population, group quarter population, and total households are first allocated to the census block group level based on 2017 ACS 5-year block group level data. The block group level group quarter population was directly allocated to the block level based on the 2010 census block level group quarter population. There was a lack of detailed information on growth patterns below the block group level. Therefore, the change in the number of workers living in each block from 2010 to 2017 (reported in the 2010 and 2017 LEHD LODES data set) and the number of households (from 2010 U.S. Census and 2017 ACS 5-year data) were used to estimate changes in the number of households at the block level. To ensure accuracy of the 2017 household total at the block level, ACS 2017 block group level household data were used as a population control, and accuracy checks were performed to ensure the accuracy of high-growth areas. The population (in households) in each block was estimated multiplying total households by household size (averages from 2010 data). The subarea control totals were used as population growth constraints. The subarea growth in the number of households was derived in proportion to subarea total population growth.
Employment	The data was gathered from a mixture of sources, including public domain data sources, published commercial datasets, stakeholder input via the Delphi Process, table-top GIS analysis, and limited field review of the study area. 2017 base year employment was allocated to the TAZ level using the 2017 InfoUSA data. Since the InfoUSA data contains latitude and longitude attributes, the data can be directly aggregated to the TAZ level. To ensure accuracy, an extensive review of the InfoUSA data was conducted. This review focused on the accuracy of the locational information of the businesses and reasonableness of the level of employment presented in the data. Once reviewed and any necessary adjustments made, employment was aggregated to the TAZ level. The subarea employment growth within each subarea by employment type was first developed proportionally to the

Variables	Forecasting method
	county level employment growth by employment type. The subarea employment-by-type growth rate was assumed to be the same as the county's.
Socio-economic	The development of 2050 demographics adopted a Delphi process to develop subarea control totals. The interim year demographics was developed based on interpolation of base year 2017 and forecast year 2050. As part of the development of reasonable horizon year forecasts for the El Paso TDM at TAZ level, a Delphi Process was conducted to help formulate population and employment projections for the region based on local knowledge. 74 community leaders throughout the El Paso region with expertise in a variety of areas participated as panel members in the El Paso Delphi Process.
Other	Socioeconomic forecasts for years 2022,2027,2032,2040, and 2050 were established using the Texas Demographics Center's control totals and guidelines. Allocation of these control totals down to the TAZ level was done through a Delphi process, considering constraints and opportunities as well as the availability of developable land and existing development density.

7 TRAVEL DEMAND MODEL

Table 8. Land-Use Model

Model Factor	Detail and Methodology
Study Area (sq-mi)	1,235
Traffic Analysis Zones (TAZs)	848
Counties	El Paso, Doña Ana, Otero

Table 9. Projects

Project Element	Description
Regionally Significant Definition	<i>Regionally significant projects</i> is defined in 3.1 (above) and 40 CFR §93.101 . EPMPO includes its agreed upon definition in the Transportation Conformity Report under section 2.5 <i>Regionally Significant Travel Projects/Programs</i> .
Capacity Changes	EPMPO identifies capacity changes to the RMS 2050 MTP in Chapter 8: Staged Improvement Plan. Please refer to projects identified with "New/Expanded Roadway" under "type" column.
CMAQ Projects	EPMPO identifies projects funded with CMAQ funds in RMS 2023-2026 TIP within the TIP pages. Please refer to the funding category within each TIP page.
Non-Federal Projects	EPMPO identifies regionally significant projects in RMS 2023-2026 TIP within the TIP pages that do not receive

	federal funding (local initiatives, private ventures, etc.). Please refer to the funding category within each TIP page.
Exempt Projects	EPMPPO identifies exempt projects in the RMS 2023-2026 TIP within the TIP pages according to the specifications outlined in the Conformity Regulations (40 CFR §93.126 , §93.127 , and/or §93.128).
Other	N/A.

Table 10. Travel Demand Model

Model Factor	Detail and Methodology
Model Validation Year	2017
Software	TransCAD
HPMS Factor	1.037120
Mode Split Method	Multinomial logit model
Countries Covered by Model	El Paso County, Southern Doña Ana County, and a portion of Otero County.
Other	N/A

Table 11. Seasonal Factor

Factor	Information	
Base Data	TxDOT El Paso County ATR data	
Year of the Base Data	2013-2021	
Season	Summer	Winter
Seasonal Period	June, July, August	December, January, February
Adjustment Factor¹	0.96285 ¹ 0.99254 ²	1.03184 ¹

¹The adjustment factor converts annual non-summer weekday to seasonal weekday for analysis years 2022, 2027, 2032, 2040 and 2050.

²The adjustment factor converts travel demand model (TDM) VMT to seasonal weekday adjusted TxDOT's annual Roadway Inventory Functional Classification Record (RIFCREC) Control totals for analysis years 2017.

Table 12. Hourly Distribution Factors

Factor	Information	
Season	Summer	Winter
Hour	Hourly Factor¹	
00:00-1:00	0.010813	0.009656
1:00-2:00	0.007174	0.006595
2:00-3:00	0.005817	0.00549

3:00-4:00	0.005831	0.005575
4:00-5:00	0.008485	0.007866
5:00-6:00	0.019771	0.017402
6:00-7:00	0.038042	0.037260
7:00-8:00	0.061580	0.063090
8:00-9:00	0.062322	0.064049
9:00-10:00	0.055301	0.056040
10:00-11:00	0.053025	0.053491
11:00-12:00	0.055167	0.055808
12:00-13:00	0.058213	0.058949
13:00-14:00	0.059641	0.060769
14:00-15:00	0.062067	0.063428
15:00-16:00	0.066343	0.069107
16:00-17:00	0.070696	0.074336
17:00-18:00	0.072223	0.074267
18:00-19:00	0.062148	0.063221
19:00-20:00	0.048714	0.047639
20:00-21:00	0.039459	0.036502
21:00-22:00	0.032720	0.029863
22:00-23:00	0.025940	0.023235
23:00-24:00	0.018508	0.016362
Total²	1.00	1.00

¹ The hourly factors for summer weekday scenario and winter weekday scenario are calculated based on the 2013 to 2021 TxDOT El Paso County ATR data.

² The sum of hourly factors over the 24-hour period must add up to 1. Highlight the values in the "Total" row and press the "F9" key to refresh and verify the total sum.

8 EMISSION MODELING

Table 13. Emission Modeling

Pollutants Reported		
Pollutants	PM ₁₀ , VOC, and NO _x	PM ₁₀
Emission Factor Development		
Emission Model Version¹	MOVES 3.1.0	MOVES 3.1.0
Years Modeled	2017, 2022, 2027 ² , 2032, 2040, 2050	2022, 2027 ² , 2032, 2040, 2050
Time periods	Summer Weekday	Winter Weekday
Functional Class	Urban restricted, Rural restricted, Urban unrestricted, Rural unrestricted	Urban restricted, Rural restricted, Urban unrestricted, Rural unrestricted

VMT mix	Four-period, time-of-day VMT mixes for conventional gasoline and Diesel source-use type by functional class will be estimated using latest vehicle classification count (2013-2021) and MOVES3 defaults. No seasonal adjustments are made for VMT mix.	Four-period, time-of-day VMT mixes for conventional gasoline and Diesel source-use type by functional class will be estimated using latest vehicle classification count (2013-2021) and MOVES3 defaults. No seasonal adjustments are made for VMT mix.	
Speed	MOVES county scale/emission rates mode will be used to model urban and rural, restricted, and unrestricted access functional class emissions factors for each of the 16 speed bin average speeds (i.e., 2.5 and 5 through 75 at 5 mph increments).	MOVES county scale/emission rates mode will be used to model urban and rural, restricted, and unrestricted access functional class emissions factors for each of the 16 speed bin average speeds (i.e., 2.5 and 5 through 75 at 5 mph increments).	
Vehicle Registration	The 2018 registration data will be used for the 2017 baseline year, and the latest registration data (year-end 2021) will be used for all future years.	The latest registration data (year-end 2021) will be used for age distribution.	
MOVES External Condition			
Calendar Year	Baseline Year, if Applicable	2017	N/A
	Other Years	2022, 2027 ² , 2032, 2040, 2050	2022, 2027 ² , 2032, 2040, 2050
Evaluation Month		July	January

¹ The emission model used in this analysis is EPA's MOVES 3.1.0 (referred to as just MOVES in this document). The latest version of MOVES is MOVES4, which was released on September 12, 2023. However, there is a 2-year conformity grace period in effect with the release and ends on September 12, 2025. After this date, MOVES4 must be used for new transportation conformity analyses. The federal register notifying this release is available at:

<https://www.federalregister.gov/documents/2023/09/12/2023-19116/official-release-of-the-moves4-motor-vehicle-emissions-model-for-sips-and-transportation-conformity>

² Since there are no adequate or approved budgets for the Doña Ana County ozone nonattainment area, an interim emissions test will be used. And an interim emissions test year (2027) has been included to satisfied the conformity rule's interim emissions test requirement (40 CFR 93.119(g)(1) the first analysis year must be no more than five years beyond the year in which the conformity determination is being made.

9 MOVES INPUT

Table 14. MOVES Input Parameters and data source

Input Parameter	Description	Base Data Source	Notes
Vehicle Population by Source Type	Input the number of vehicles in the geographic area which is to be modeled for each vehicle.	TxDMV data (year-end 2021), MOVES defaults for rates runs.	<ul style="list-style-type: none"> Local gasoline and diesel-powered source type populations by analysis year is estimated for use external to MOVES in the estimation of county level vehicle starts and source-hours-parked, needed in the external emissions calculations, per TTI's rates-per-activity, TDM-based method. Populations by SUT and fuel type are a function of TxDMV year-end vehicle registration data and VMT mix, and in the case of base and future years, population scaling factors.
Fleet Age Distribution by Source Type	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.	TxDMV data (year-end 2018 and 2021), MOVES defaults for refuse trucks, motor homes, and buses.	<ul style="list-style-type: none"> Age distributions will be developed using TxDMV registration data aggregated at the county level for all source types except the single-unit long-haul source types, which will be statewide level. Since no 2017 registration data is available for use with the 2017 baseline, the 2018 TxDMV data will be used for the 2017 baseline for age fraction. For all future analysis years 2021 TxDMV data will be used. The distribution of Age fractions should sum up to 1.0 for each source use type for each analysis year.
Fleet VMT by HPMS Vehicle Type	County specific VMT is distributed to 6 HPMS Vehicle types	MOVES defaults for rates runs.	<ul style="list-style-type: none"> Local activity estimates are applied in emissions calculations external to MOVES.
Road Type VMT distributions	fractions of VMT across the four MOVES road types, for each source type. .	MOVES defaults for rates runs.	<ul style="list-style-type: none"> Local activity estimates are applied in emissions calculations external to MOVES. VMT fraction is distributed between the road type and must sum to 1.0 for each source type.
Average Speed Distribution	Input average speed data specific to vehicle type, road type, and	MOVES defaults for rates runs.	<ul style="list-style-type: none"> Local activity estimates are applied in emissions calculations external to MOVES.

Input Parameter	Description	Base Data Source	Notes
	time of day/type of day into 16 speed bins.		<ul style="list-style-type: none"> The sum of speed distribution to all speed bins for each road type, vehicle type, and time/day type would be 1.0.
Fuel Supply (Table 15)	Input to assign existing fuels to counties, months, and years, and to assign the associated market share for each fuel	Combination of MOVES defaults and local information	<ul style="list-style-type: none"> For each analysis year and season, the local fuel supply will consist of one conventional gasoline formulation and one biodiesel formulation. (Although only the predominant fuels gasoline and diesel will be modeled, the other MOVES fuel type formulations will be input as required to run the MOVES model.)
Fuel Formulation (Table 16)	Input county specific fuel properties in the MOVES database.	El Paso fuel survey data, Department of Energy (DOE) state-level biodiesel (BD) consumption estimates and MOVES defaults for parameters.	<ul style="list-style-type: none"> Conventional gasoline (CG) formulations based on TCEQ's summer 2017 and summer 2023 (latest available) fuel survey samples from El Paso County. <ul style="list-style-type: none"> The 2017 CG properties are actual 2017 averages (fuel grade averages weighted by relative sales volumes). The 2022 CG properties are actual 2023 averages (fuel grade averages weighted by relative sales volumes). The Future Years (2024+) CG properties are latest available actual 2023 averages except with RVP, average sulfur level, and average benzene content set to the "expected" values (MOVES3 defaults, consistent with the pertinent regulatory standards). The 2017 diesel sulfur level is the statewide average from TCEQ's 2017 survey. The 2022 diesel sulfur level is the statewide average from TCEQ's 2023 survey. Future years (2024+) diesel sulfur was set to the current expected future year value (6 ppm), which is conservative and consistent with the statewide diesel sulfur average from TCEQ's latest (2023) survey. The BD ester volume percentages for 2017 and future years were based on 2017 and the latest available (2021) DOE

Input Parameter	Description	Base Data Source	Notes
			<p>state-level transportation sector BD consumption estimate.</p> <ul style="list-style-type: none"> Fuel subtype IDs 12 and 21 are 10% ethanol-blend gasoline and biodiesel, respectively.
Fuel Engine Fraction / Diesel Fraction	Input fuel engine fractions (i.e., Gasoline vs. Diesel Engines types in the vehicle population) for all vehicle types.	<p>TxDMV data (year-end 2018 and 2021), on particular source type diesel fractions; MOVES defaults for other source types.</p>	<ul style="list-style-type: none"> Locality-Specific/MOVES default (renormalized with setting CNG fractions to zero). Since no 2017 registration data is available for use with the 2017 baseline, the 2018 TxDMV data will be used for the 2017 baseline for fuel engine fraction. For all future analysis years 2021 TxDMV data will be used. TTI developed the evaluation year-specific local diesel fractions for the MOVES single unit and combination truck source use types aggregated to the statewide level.
Meteorology (Table 17)	County Specific data on temperature and humidity	Average hourly from weather stations within El Paso County	<ul style="list-style-type: none"> The summer and winter season temperature and humidity data are the same values used in the previous MOVES2014b-based Regional Mobility Strategy 2050 MTP emissions analysis. These inputs were based on 2017 El Paso County weather station data, provided by TCEQ, and are consistent with the TCEQ's latest (2017) El Paso periodic emissions inventory submittal to EPA required under the Air Emissions Reporting Rule [AERR]).
I/M Coverage (Table 18)	Input I/M coverage record for each combination of pollutants, process, county, fuel type, regulatory class and model year is specified using this input.		<ul style="list-style-type: none"> Begin and end model year (X, Y) define the range of model years covered – where X and Y, respectively, are calculated as YearID – 24, and YearID – 2. For analysis year 2017, I/M compliance factor estimates were applied the same compliance factors in the previous MOVES2014b-based Regional Mobility Strategy 2050 MTP emissions analysis. For future years, I/M compliance factor estimates calculated by TTI using TCEQ 2021 statewide compliance data and MOVES3 I/M compliance factor equation in MOVES3 Technical Guidance (Source: E- mail from Mobile Source Programs

Input Parameter	Description	Base Data Source	Notes
			<p>Team, values confirmed January 11, 2023, Based on Calendar Year 2021 I/M Program Data); El Paso I/M-program-specific I/M waiver rates and failure rates, and statewide average I/M compliance rates; in combination with MOVES3 regulatory class coverage adjustments.</p> <ul style="list-style-type: none"> • The model processes/pollutants affected are start and running exhaust HC, CO, NOx, and tank vapor venting HC; fuel type is gasoline; frequency is annual.

Table 15. Fuel Supply

Fuel Type	Fuel Formulation ID	Market Share	Market Share CV¹
Gasoline	17703, 2313, 2373, 2473	1.0	N/A
Diesel	30176, 30236, 30600	1.0	N/A

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

²E85, CNG and electricity MOVES default IDs will be used, per MOVES3 requirement to run the model, even though those fuel types do not affect the emissions results.

Table 16. Fuel Properties

Factor	Information						
Fuel Type	Gasoline	Gasoline	Gasoline	Gasoline	Diesel	Diesel	Diesel
Fuel Formulation ID	17703	2313	2373	2473 ¹	30176	30236	30600 ²
Fuel Subtype ID	12	12	12	12	21	21	21
Analysis Year	2017	2022+	2022	2024+	2017	2022	2024+
Season	Summer	Winter	Summer	Summer	Summer and Winter	Summer and Winter	Summer and Winter
RVP	6.94	11.50	7.11	7.00	0	0	0
Sulfur Level	19.56	10.00	9.39	10.00	6.37	5.91	6.00
ETOH Volume	9.6	10.00	9.89	9.89	0	0	0
MTBE Volume	0	0	0.00	0.00	0	0	0
ETBE Volume	0	0	0.00	0.00	0	0	0
TAME Volume	0	0	0.00	0.00	0	0	0
Aromatic Content	26.67	22.90	27.10	27.10	0	0	0
Olefin Content	5.50	11.14	5.62	5.62	0	0	0
Benzene Content	1.13	0.67	1.07	0.70	0	0	0
e200	48.74	49.86	45.96	45.96	0	0	0
e300	87.84	85.17	85.80	85.80	0	0	0
Vol to Wt Percent Oxy	0.3653	0.3653	0.3653	0.3653	0	0	0
BioDieselEster Volume	N/A	N/A	N/A	N/A	4.68	3.13	3.13
Cetane Index	N/A	N/A	N/A	N/A	N/A	N/A	N/A
PAH Content	N/A	N/A	N/A	N/A	N/A	N/A	N/A
T50	206.12	199.39	207.76	207.76	0	0	0
T90	306.72	320.54	315.98	315.98	0	0	0

¹ Summer conventional gasoline (CG) - TTI based the CG formulations on TCEQ's summer 2017 and summer 2023 (latest available) fuel survey samples from El Paso County. The 2017 CG properties are actual 2017 averages (fuel grade averages weighted by relative sales volumes). The 2022 CG properties are the latest available actual 2023 averages. Future Years (2024+) CG properties are latest available actual 2023 averages except with RVP, average sulfur level, and average benzene content set to the "expected" values (MOVES3 defaults, consistent with the pertinent regulatory standards). Winter CG – MOVES defaults.

² The 2017 diesel sulfur level is the statewide average from TCEQ's 2017 survey. The 2022 diesel sulfur level is the statewide average for TCEQ's 2023 survey. Future years (2024+) diesel sulfur was set to the current expected future year value (6 ppm), which is conservative and consistent with the statewide diesel sulfur average from TCEQ's latest (2023) survey. The biodiesel (BD) ester volume percentages for 2017 and future years were based on 2017 and the latest available (2021) DOE state-level transportation sector BD consumption estimates. Fuel subtype IDs 12 and 21 are 10% ethanol-blend gasoline and biodiesel, respectively.

Table 17. Hourly Meteorological Data

Factor	Information			
County/Area(s)	El Paso County, Southern Doña Ana County, and a portion of Otero County.	El Paso County, Southern Doña Ana County, and a portion of Otero County.	El Paso County, Southern Doña Ana County, and a portion of Otero County.	El Paso County, Southern Doña Ana County, and a portion of Otero County.
Season	Summer	Summer	Winter	Winter
Hour	Temperature (°F)	Relative Humidity (%)	Temperature (°F)	Relative Humidity (%)
00:00-1:00	79.77	42.73	48.57	45.01
1:00-2:00	78.51	45.05	47.44	46.81
2:00-3:00	77.31	47.11	46.44	48.65
3:00-4:00	76.27	49.05	45.46	50.32
4:00-5:00	75.38	50.63	44.62	51.63
5:00-6:00	74.47	52.45	43.71	53.29
6:00-7:00	73.96	53.51	43.08	54.26
7:00-8:00	75.19	51.26	43.39	52.85
8:00-9:00	77.54	46.95	45.76	48.11
9:00-10:00	80.13	42.42	48.91	43.16
10:00-11:00	82.81	37.98	52.31	38.25
11:00-12:00	85.38	33.88	55.29	34.22
12:00-13:00	87.54	30.66	57.39	31.80
13:00-14:00	89.27	28.03	59.07	29.61
14:00-15:00	90.68	25.90	60.29	27.94
15:00-16:00	91.85	24.01	60.83	27.40
16:00-17:00	92.09	24.18	60.37	28.06
17:00-18:00	91.62	24.77	58.77	30.20
18:00-19:00	90.74	25.75	56.88	32.70
19:00-20:00	89.02	28.24	55.16	35.17
20:00-21:00	86.68	32.05	53.66	37.07
21:00-22:00	84.78	34.61	52.16	39.26
22:00-23:00	82.97	37.00	50.77	41.34
23:00-24:00	81.28	40.04	49.58	42.97

Table 18. I/M Inputs

Factor	I/M Information			
Test Standards Description	Two-mode, 2500 RPM/Idle Test	Evaporative Gas Cap Check	Exhaust OBD Check	Evaporative Gas Cap and OBD Check
Test Standards ID	12	41	51	45
Year ID	2017	2017	2017, 2022, 2027, 2032, 2040, 2050	2017, 2022, 2027, 2032, 2040, 2050
Source Use Type	21, 31, 32	21, 31, 32	21, 31, 32	21, 31, 32
Begin Model Year	X	X	X	X
End Model Year	1995	1995	Y	Y
I/M Compliance	21 – 95.20% 31 – 93.30% 32 – 87.58%	21 – 95.20% 31 – 93.30% 32 – 87.58%	2017 21 – 95.20% 31 – 93.30% 32 – 87.58% Future Years 21 – 94.00% 31 – 90.35% 32 – 70.74%	2017 21 – 95.20% 31 – 93.30% 32 – 87.58% Future Years 21 – 94.00% 31 – 90.35% 32 – 70.74%

Source use type: 21 – Passenger Car, 31 – Passenger Truck, 32 – Light Commercial Truck

Table 19. MOVES Emissions Factor Post-Processing to be Performed by County and Year

Strategy and Post-processing Result	Analysis Year	Counties
Texas Low Emission Diesel Fuel (TxLED)	N/A	N/A

Table 20. Emission Controls Used for Conformity Credit

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

Pre-Analysis Consensus Plan Comment and EPMPO Response Matrix

January 3rd, 10th, and 17th 2024– Follow up Comments

COMMENTS FROM TCEQ ON EL PASO MPO PREANALYSIS PLAN FOR DESTINO 2050 MTP AND 2023-2026 TIP UPDATES

DOCUMENT: PREANALYSIS PLAN FOR CONSENSUS

Page	Section	TCEQ Comment/Suggestion, dated January 3, 10 & 17, 2024	EPMPO Response
4	Section 1-B. Non-attainment status	Comment: Consider adding information here about El Paso County, ozone, and the recent court reversal. If this conformity will cover a potential El Paso County ozone nonattainment area demonstration, a brief summary of the situation is warranted.	Response: The document has been revised with the EPA’s suggested additional language which has been added in 2 nd paragraph: <ul style="list-style-type: none">“Effective December 30, 2021, EPA expanded the Sunland Park 2015 Ozone NAAQS marginal non-attainment area to include El Paso County. On June 30, 2023, the U.S. Court of Appeals for the District of Columbia Circuit (“D.C. Circuit”) issued a decision that reversed EPA’s designation of El Paso County as marginal non-attainment for the 2015 Ozone NAAQS. Currently, EPA is evaluating response options to this D.C. Circuit decision. The interagency partners have elected to evaluate El Paso County NOx and VOC emissions as part of this conformity analysis in case EPA issues a nonattainment designation for El Paso County in response to the D.C. Circuit decision before completion of this conformity process.”
8	Section 4, Table 4. Applicable SIP and Emissions Budget(s)	Comment: a) Consider adding a note to the table to explain why the El Paso County 1979 one-hour ozone NAAQS SIP budgets are being included. b) Did the partners discuss what to do with the “Attainment Year” column? c) Also consider adding information explaining that there are no applicable budgets associated with the Sunland Park ozone NAAQS nonattainment area – maybe an additional reference to the footnote referenced in Table 5?	Response: a) The document has been revised and the following language has been added as a footnote: “ ² The interagency partners have elected to evaluate El Paso County NOx and VOC emissions as part of this conformity analysis in case EPA issues a nonattainment designation for El Paso County in response to the D.C. Circuit decision before completion of this conformity process. The VOC and NOx budget is based on the 1996 one-hour ozone SUPER SIP.” b) An email will be sent to request the partners’ preference for keeping/deleting the “Attainment Year” column? c)EPA’s suggested footnote was incorporated:

			<p>“¹Since there are no adequate or approved budgets for the Doña Ana County ozone nonattainment area, an interim emissions test will be used. Per §93.119(g), the first analysis year may be no more than five years beyond the year in which the determination is being made.”</p>
8	Section 5, Table 6. Conformity Analysis Years	<p>Comment: It would be helpful to provide a note associated with the attainment year row to clarify why it’s not applicable for PM or ozone.</p>	<p>Response: The document has been revised and the following footnote has been added: “³ On January 18, 1994, the EPA approved the El Paso PM-10 SIP revision, and approved the attainment demonstration SIP as meeting the requirements of Section 179B, showing that the area would timely attain the PM-10 standard but for emissions from Mexico. On February 28, 2022, the TCEQ submitted an FCAA, §179 Demonstration to the EPA for the El Paso County portion of the El Paso-Las Cruces, Texas-New Mexico nonattainment area. The demonstration documented that El Paso County would have attained the 2015 eight-hour ozone NAAQS by the August 3, 2021 attainment date "but for" emissions emanating from outside the U.S.”</p>
12	Table 12. Emission Modeling	<p>Comment: Indicates MOVES, with explanation in Footnote 2. Recommend using MOVES 3.1.0 in the table with the same footnote explaining why not MOVES4</p>	<p>Response: Agreed, as recommended MOVES3.1.0 is added in the Table 12 along with a footnote explaining why MOVES4 was not used.</p>
15	Table 13. MOVES Input Parameters and data source	<p>Comment: For last row, I/M Coverage (Table 17), information needs to include 2017 as a separate set of values. Information is correct for all future years (2021 is most recent). 2017 uses 2017 values for compliance factors --- update information to include the historical values for 2017.</p>	<p>Response: Updated the Table 13 with 2017 I/M factors.</p>
18	Table 17. I/M Inputs	<p>Comment: Information needs to be updated to show 2017 inputs consistent with 2017 historical compliance factors. Compliance factors for future years use most recent. Compliance factors for historical years use historical program information. Information is correct for all future years</p>	<p>Response: Updated the Table 17 with 2017 I/M factors.</p>
8	Table 6. Conformity Analysis Years	<p>Comment: If the partners agree, I suggest simplifying Footnote 3, associated with Table 6, using language EPA provided in its comment on the Attainment Year row: “Attainment years for the</p>	<p>Response: The document has been revised.</p>

		1987 PM10 NAAQS and the 2015 Ozone NAAQS marginal classification predate the years covered by the MTP and TIP, and therefore will not be evaluated as an analysis year.”	
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EPA REGION 6 COMMENTS / EL PASO MPO RMS 2050 MTP AND RMS 2023-2026 TIP UPDATES PRE-ANALYSIS CONSENSUS PLAN

Page	Section	EPA Comment/Suggestion, dated January 5,2024	EPMPPO Response 1/8/2024
4	Section 1 – The Purpose of Transportation Conformity Emissions Analysis / B. Nonattainment Status	<ul style="list-style-type: none">•This may be an appropriate place in the PACP to explain the partners’ decision to include El Paso County NOx & VOC emissions in this analysis. Suggested additional language (as a 2nd paragraph): <p>O “Effective December 30, 2021, EPA expanded the Sunland Park 2015 Ozone NAAQS marginal non-attainment area to include El Paso County. On June 30, 2023, the U.S. Court of Appeals for the District of Columbia Circuit (“D.C. Circuit”) issued a decision that reversed EPA’s designation of El Paso County as marginal non-attainment for the 2015 Ozone NAAQS. Currently, EPA is evaluating response options to this D.C. Circuit decision. The interagency partners have elected to evaluate El Paso County NOx and VOC emissions as part of this conformity analysis in case EPA issues a nonattainment designation for El Paso County in response to the D.C. Circuit decision before completion of this conformity process.”</p>	Response: The document has been revised and the suggested additional language has been added.

Page	Section	EPA Comment/Suggestion, dated January 5,2024	EPMPO Response 1/8/2024																														
8	Table 4. Applicable SIP and Emissions Budget(s)	<p>a) I’m unclear as to the inclusion of 2015 as the attainment year for the El Paso County 1979 1-hour Ozone MVEBs. The attainment year for these MVEBs is 1996.</p> <ul style="list-style-type: none">Given the age of the El Paso PM10 MVEB and the El Paso County NOx and VOC MVEBs, inclusion of the associated attainment years in this table may be more confusing than clarifying. I defer to the partners’ preference for keeping/deleting these MVEB attainment years. <p>b) It may be helpful to add an “area boundary” column to distinguish how these SIPs apply to the area being evaluated.</p> <p>c) Agree with TCEQ’s suggestion to use footnote 1 to explain Sunland Park lack of MVEBs.</p> <ul style="list-style-type: none">I’m unclear for the benefit/need of the second sentence in footnote 1: “When reclassified to moderate, the attainment year for the Doña Ana County ozone nonattainment area will be 2023”. I recommend removal of this sentence. <p>A revised version of Table 4 incorporating these suggested edits, for the partners’ consideration:</p> <table><tr><th>SIP</th><th>Area Boundary</th><th>Attainment Year</th><th>Pollutant</th><th>Emission Budget (TPD)</th></tr><tr><td>1987 PM10 SIP</td><td>El Paso (1991 city limits)</td><td>1994</td><td>PM10</td><td>12.05</td></tr><tr><td>1-hour Ozone SIP</td><td>El Paso County</td><td>1996</td><td>VOC</td><td>36.23</td></tr><tr><td>1-hour Ozone SIP</td><td>El Paso County</td><td>1996</td><td>NOx</td><td>39.76</td></tr><tr><td>N/A</td><td>Sunland Park</td><td>N/A</td><td>VOC</td><td>N/A¹</td></tr><tr><td>N/A</td><td>Sunland Park</td><td>N/A</td><td>NOx</td><td>N/A¹</td></tr></table> <p>¹Since there are no adequate or approved budgets for the Doña Ana County ozone nonattainment area, an interim emissions test will be used. Per §93.119(g), the first analysis year may be no more than five years beyond the year in which the determination is being made.</p>	SIP	Area Boundary	Attainment Year	Pollutant	Emission Budget (TPD)	1987 PM10 SIP	El Paso (1991 city limits)	1994	PM10	12.05	1-hour Ozone SIP	El Paso County	1996	VOC	36.23	1-hour Ozone SIP	El Paso County	1996	NOx	39.76	N/A	Sunland Park	N/A	VOC	N/A ¹	N/A	Sunland Park	N/A	NOx	N/A ¹	<p>a) An email will be sent to request the partners’ preference for keeping/deleting the “Attainment Year” column?</p> <p>b) The revised version of Table 4 incorporating these suggested edits has been incorporated to the document.</p> <p>c) The document has been revised and footnote suggested has been incorporated.</p>
SIP	Area Boundary	Attainment Year	Pollutant	Emission Budget (TPD)																													
1987 PM10 SIP	El Paso (1991 city limits)	1994	PM10	12.05																													
1-hour Ozone SIP	El Paso County	1996	VOC	36.23																													
1-hour Ozone SIP	El Paso County	1996	NOx	39.76																													
N/A	Sunland Park	N/A	VOC	N/A ¹																													
N/A	Sunland Park	N/A	NOx	N/A ¹																													

Page	Section	EPA Comment/Suggestion, dated January 5,2024	EPMPO Response 1/8/2024
8	Table 6. Conformity Analysis Years	Agree with TCEQ’s suggestion to clarify “N/A” for Attainment Year variable. Attainment years for the 1987 PM10 NAAQS and the 2015 Ozone NAAQS marginal classification predate the years covered by the MTP and TIP, and therefore will not be evaluated as an analysis year. To the best of my memory, the 2022 analysis year was used in the previous El Paso area conformity analysis to satisfy the interim year requirement under §93.119(g), as well as the § 93.106(a)(1)(i) requirement that analysis years be no more than 10 years apart.	<p>Response: The document has been revised and the following footnote has been added:</p> <p>“³On January 18, 1994, the EPA approved the El Paso PM-10 SIP revision, and approved the attainment demonstration SIP as meeting the requirements of Section 179B, showing that the area would timely attain the PM-10 standard but for emissions from Mexico. On February 28, 2022, the TCEQ submitted an FCAA, §179 Demonstration to the EPA for the El Paso County portion of the El Paso-Las Cruces, Texas-New Mexico nonattainment area. The demonstration documented that El Paso County would have attained the 2015 eight-hour ozone NAAQS by the August 3, 2021 attainment date "but for" emissions emanating from outside the U.S.”</p>
8	Table 6. Conformity Analysis Years	Under §93.119(g)(1), when using an interim emissions test, the first analysis year must be no more than 5 years beyond the year in which the conformity determination is being made. Footnote 1 to ‘Table 6: Conformity Analysis Years’ of the revised PACP captures this language, but EPA does not see an analysis year established to serve this purpose. The current conformity determination is being made in 2024, 2022 is a past year, and the PACP does not identify another analysis year until 2032. To satisfy the 5-year requirement for Sunland Park, EPA recommends including an interim emissions test analysis year for Sunland Park somewhere between 2024-2029.	<p>Response: The document has been revised and an additional interim emissions test analysis year (2027) has been added. An additional 30-day public comment period for the Amended RMS 2050 MTP will be conducted from April 15,2024 to May 14,2024.</p>

FHWA-TX-PPD-AQ COMMENTS / EL PASO MPO RMS 2050 MTP AND RMS 2023-2026 TIP UPDATES PRE-ANALYSIS CONSENSUS PLAN

Page	Section	FHWA-TX-PPD-AQ Comment/Suggestion, dated January 19, 2024	EPMPO Response 02/13/2024
Multi	Table 1 to 19	<p>General. For clarity, notes should be placed at the base of each table (vs. using endnotes to cover multi tables).</p> <p>Also, when table notes are superscripted with a number, the superscripted number should be found within the table.</p> <p>While not a comprehensive list, examples of the above include: Table 4, 6, 12, 14.</p>	Response: Agreed, the foot notes have been converted to table notes.
5 of 20	N/A	Former PACP 'Table 8. Projects.' should be included, as applicable.	Response: As recommended the 'Table8.Projects' table has been added and all other table numbers updated accordingly.
	Table 8	Please include the sources of the project listing	Response: The table has been revised.
7 of 20	Table 2	Timeframe. Given #5, #3 ending date should likely read 'March 22, 2024' (Friday TPB date) versus 'March 31, 2024' Sunday.	Response: The # 3 ending date has been modified to 3/22/2024 to match the # 5 date.
7 of 20	Table 2	Task Item. Rather than 'Lapse of Conformity...' this should be revised to 'Deadline for MTP update'.	Response: The text description of the task item has been revised to the recommended text.
8 of 20	Table 4	Sunland Park VOC. Include nonattainment area similar to PM ₁₀ area boundary.	Response: The text description Sunland Park (a portion of Doña Ana County near Sunland Park, NM) has been added to describe the nonattainment boundary.
8 of 20	Table 4	Sunland Park NOx. Include nonattainment area similar to PM ₁₀ area boundary.	
13 of 20	Table 12	Vehicle Registration. Given the availability of 2018 TxDMV YR end data should this be used in lieu of 2021 TxDMV data? Please advise.	Response: The 2021 year-end TxDMV registration data is the

Page	Section	FHWA-TX-PPD-AQ Comment/Suggestion, dated January 19, 2024	EPMPO Response 02/13/2024
13 or 20	Table 13	Vehicle Population by Source Type. Given the availability of 2018 TxDMV YR end data should this be used in lieu of 2021 TxDMV data? Please advise.	latest available data for estimating vehicle population, age distribution, and Alternate Vehicle and Fuel Technology (AVFT). It is recommended to use the 2021 year-end data for this conformity analysis for future years. The 2018 year-end data is used for 2017 analysis year for age distribution and AVFT. The vehicle population estimates are scaled from 2021 registration data for all analysis years.
13 or 20	Table 13	Fleet Age Distribution of Source Type. Given the availability of 2018 TxDMV YR end data should this be used in lieu of 2021 TxDMV data? Please advise.	
19 of 20	Table 18	TxLED. Given 'Counties' is 'N/A', it seems 'Analysis Year' be 'N/A'. Please advise.	Response: As recommended to avoid confusion, the analysis year value has been revised to 'N/A'.

TCEQ Comments and EPMPO Response Matrix
COMMENTS FROM TCEQ ON EL PASO MPO TRANSPORTATION CONFORMITY REPORT FOR AMENDED 2050 MTP AND 2023-2026 TIP
Tuesday, August 20, 2024

Page	Descr.	TCEQ Comment	EPMPO Response
8	Conformity Requirements	<p>TCEQ SIP revisions related to the nonattainment/maintenance areas for this conformity were not required for marginal areas.</p> <p>Recommend revising first sentence of the section to: "The TCEQ and New Mexico Environmental Department (NMED) prepared State Implementation Plans (SIPs) relevant to the nonattainment and maintenance areas covered by this conformity demonstration, as described in the following subsections."</p>	Document has been revised.
9	New Mexico Ozone SIP	<p>If the 179B for Dona Ana has been approved, that would be helpful information to include as it will lock the area into marginal nonattainment SIP requirements.</p>	<p>EPMPO reached New Mexico Environmental Department and was confirmed that the 179B has not been approved, "No, our 179B demonstration has still not made any progress. We have not received an approval and am not expecting one until the next administration. In the meantime, a bump up in nonattainment designation from marginal to moderate is not expected".</p>
12	Motor Vehicle Emissions Budgets	<p>Table 1: Recommend deleting the "Classification" row in the Table.</p> <p>These budgets are not for a marginal nonattainment area.</p>	Document has been revised and "Classification" row has been deleted.

13	Conformity Tests	First paragraph on page – one long sentence. Recommend breaking up the sentence for readability.	Document has been revised and the long sentence has been broken on bullets, to indicate the recommendations.
Document: Appendix A – Applicable SIPs			
3	First bullet	Update link: https://www.tceq.texas.gov/downloads/air-quality/sip/archive/elp_pm_nov1991_archive.pdf	The link has been replaced: https://wayback.archiveit.org/414/20210528100257/https://www.tceq.texas.gov/assets/public/implementation/air/sip/elp/ELP_PM_Nov1991-2012_currentplan.pdf
3	Second Bullet	Update link: https://wayback.archive-it.org/414/20210527180823/https://www.tceq.texas.gov/assets/public/implementation/air/sip/elp/ELP_CO_Jan2008.pdf	The link has been replaced: https://wayback.archiveit.org/414/20210527180823/https://www.tceq.texas.gov/assets/public/implementation/air/sip/elp/ELP_CO_Jan2008.pdf
3	Third Bullet	Update link: https://www.tceq.texas.gov/downloads/air-quality/sip/archive/elp_co_imp_9-2016_archive.pdf	The link has been replaced: https://www.tceq.texas.gov/downloads/air-quality/sip/archive/elp_co_imp_9-2016_archive.pdf
Documents: Appendix I-A-1-InputOutput MOVES Description			
4	MOVES3 Based Emissions Files	Change MOVES2014 to MOVES3.	Document has been revised.

General Comments

Recommend an overall proofreading review of documents for consistency.
TCEQ reviewed appendices D, F, and I and confirmed fuel inputs.

#	Project ID	CSJ	TTI's Comment	MPO Response
1	1063X-CAP	2121-02-166	Project show drop in lane that TTI could not verify based on project description. Project description indicates widen of lanes but the interstate and frontage roads saw decrease in lanes.	The minor lane reductions in question are not included in the project description because they are for operational purposes only and do not affect Conformity. The project is coded in the TDM based on schematics provided by TxDOT-ELP. The TDM runs and corresponding emissions analysis are adequate and correct.
2	M089A	0924-06-570	Project show drop in lane that TTI could not verify based on project description. Network in project listing is 2032 when first change in TDM is 2027.	Project will be open by 2027 network year. The description for the project was revised and approved by the MPO's TPB at the December 2024 meeting to ensure clarity with consistency with the TDM. The revised description will be included in the current MTP and in Appendix C-Project List of the Conformity documentation. The drop in lane is due to this being considered a road diet project that does not have an impact on Conformity.
3	F001B-15A	0167-01-122	Network in project listing is 2032 when first change in TDM is 2027.	Appendix C pdf provided to the consultative partners on June 21, 2024 includes the 2027 network year. The excell document sent to TTI was not updated and did not include the 2027 year. EPMPO met with TTI on December 4 and reviewed the 2027's projects.
4	P201B-CAP	0665-02-002	Network in project listing is 2032 when first change in TDM is 2027.	Appendix C pdf provided to the consultative partners on June 21, 2024 includes the 2027 network year. The excell document sent to TTI was not updated and did not include the 2027 year. EPMPO met with TTI on December 4 and reviewed the 2027's projects.
5	P201B-CAP2	0665-02-004	Network in project listing is 2032 when first change in TDM is 2027.	Coding in the TDM is correct and consistent with project description. The PROJECTYR field for links 6686 and 10504 will be changed to 2032, which does not affect Conformity. The project will be open to the public by 2032 network year.
6	P004X-CAP-1	0924-06-564	Network in project listing is 2032 when first change in TDM is 2027.	Appendix C pdf provided to the consultative partners on June 21, 2024 includes the 2027 network year. The excell document sent to TTI was not updated and did not include the 2027 year. EPMPO met with TTI on December 4 and reviewed the 2027's projects.
7	M089A	0924-06-570	Network in project listing is 2032 when first change in TDM is 2027.	Appendix C pdf provided to the consultative partners on June 21, 2024 includes the 2027 network year. The excell document sent to TTI was not updated and did not include the 2027 year. EPMPO met with TTI on December 4 and reviewed the 2027's projects.
8	M090X	0924-06-577	Network in project listing is 2032 when first change in TDM is 2027.	Appendix C pdf provided to the consultative partners on June 21, 2024 includes the 2027 network year. The excell document sent to TTI was not updated and did not include the 2027 year. EPMPO met with TTI on December 4 and reviewed the 2027's projects.

9	B201X-CAP	0924-06-611	Network in project listing is 2032 when first change in TDM is 2027.	Appendix C pdf provided to the consultative partners on June 21, 2024 includes the 2027 network year. The excell document sent to TTI was not updated and did not include the 2027 year. EPMPO met with TTI on December 4 and reviewed the 2027's projects.
10	I405X-CAP	2121-01-094	Network in project listing is 2032 when first change in TDM is 2027.	Appendix C pdf provided to the consultative partners on June 21, 2024 includes the 2027 network year. The excell document sent to TTI was not updated and did not include the 2027 year. EPMPO met with TTI on December 4 and reviewed the 2027's projects.
11	I061X-CAP-1	2121-02-167	Network in project listing is 2032 when first change in TDM is 2027.	Appendix C pdf provided to the consultative partners on June 21, 2024 includes the 2027 network year. The excell document sent to TTI was not updated and did not include the 2027 year. EPMPO met with TTI on December 4 and reviewed the 2027's projects.
12	F057X-CAP	2552-02-028	Network in project listing is 2032 when first change in TDM is 2027.	Appendix C pdf provided to the consultative partners on June 21, 2024 includes the 2027 network year. The excell document sent to TTI was not updated and did not include the 2027 year. EPMPO met with TTI on December 4 and reviewed the 2027's projects.
13	P004X-CAP-2	0924-06-565	Network in project listing is 2032 when first change in TDM is 2027.	Appendix C pdf provided to the consultative partners on June 21, 2024 includes the 2027 network year. The excell document sent to TTI was not updated and did not include the 2027 year. EPMPO met with TTI on December 4 and reviewed the 2027's projects.

EP MPO Regional Transportation Conformity					EPMPO Response November/21/2024
#	page	section	additional identifier	PPD Comments November 7, 2024	
Transportation Conformity Report (TCR)					
1	1	Cover Page	bottom right corner	Suggest providing supporting information regarding the May 23, 2024 date e.g., (dated) Resolution, Minutes. (Requested/Provided under separate cover.)	Resolutions and minutes were sent to FHWA on Thursday, November 7th. And the cover page has been updated the day of TPB's adoption June 21th, 2024.
2	3	Resolution		Suggest providing a dated Resolution.	A text box has been added stating that the resolution was signed on June 21, 2014 immediately after the Transportation Policy Board meeting.
3	6	Glossary	ATR	Suggest confirming the need for 'ATR' as the Anti-Tampering section is not included.	ATP: Anti-Tampering Program, It is not longer required and has been removed.
4	8	Executive Sum.	2nd paragraph	Suggest confirming inclusion of 'MOVES 3.1.0' versus 'MOVES 3.0'. https://www.govinfo.gov/content/pkg/FR-2023-09-12/pdf/2023-19116.pdf <i>Two year clock started on Sep 12, 2023.</i>	Document has been revised. The following text is revised to the apprentices: MOVES 3.1 is the latest available minor revision to MOVES3 and released on November 2022.
5	8	Executive Sum.	2nd paragraph	Suggest confirming November 2020 as the MOVES3 date.	Document has been revised.
6	8	Executive Sum.	3rd paragraph	Suggest confirming use of 'RMS 2050 MTP' versus 'Amended RMS 2050 MTP.'	Document has been updated.
7	9	Executive Sum.	1st paragraph	Suggest updating sentence from future tense to past tense.	Document has been updated.
8	9	Executive Sum.	1st paragraph	Suggest providing Amended RMS 2050 MTP, RMS 2023-2026 TIP and TCR adoption documentation e.g., Minutes, Resolutions. See 1. Comment/Response above.	Resolutions and minutes were sent to FHWA on Thursday, November 7th. And the cover page has been updated the day of TPB's adoption June 21th, 2024.
9	13	MVEB	Table 1	Suggest providing the Appendix A location of the MVEB NOx, VOC and PM10 tpd.	Document has been updated and the pages had been added.
10	13	Executive Sum.	MVEB 2nd paragraph	Since prior to Fall 2023, when the EPMPO decided a new conformity was needed, suggest confirming the importance of the following to this conformity 'On <u>June 22nd, 2021</u> , the El Paso Metropolitan Planning Organization (MPO) hosted a consultative partners conference call to request guidance as it relates to the 2015 Ozone NAAQS designation for Sunland Park, New Mexico non-attainment area: interim emissions test and demonstration years. <u>For the purpose of this conformity determination</u> per guidance from the consultative partners, a no-greater-than-baseline year test was performed and baseline year 2017 was compared with the analysis years 2022, 2027,2032, 2040 and 2050 for Dona Ana non-attainment area.'	During the development of the RMS2050 conformity El Paso MPO hosted a consultative partners conference call where was request guidance as it relates to the 2015 Ozone NAAQS designation for Sunland Park, New Mexico non-attainment area: interim emissions test and demonstration years. As on the consultative partners conference call hosted on December 14,2023 this guidance was reconfirm, the document has been revised to reflect the last calls : December 14th, 2023 it was reconfirm the a no-greater-than-baseline year test baseline.
11	13	Executive Sum.	Conformity Tests 1st paragraph	Suggest confirming the MOVES3 release date. Revise, as appropriate.	Document has been revised. The text has been revised as: The official release of MOVES3.1 (released November 2022)
12	13	Executive Sum.	Conformity Tests 1st paragraph	Suggest revising 'hold' to 'held'.	Document has been revised.
13	13-14	Executive Sum.	Conformity Tests 1st paragraph	Suggest revising the following sentence 'On past calls were request guidance on the use of MOBILE-based MVEBs with a MOVES-based regional emissions analysis for the transportation conformity determination as MOVES-based MVEBs do not currently exist in the SIP.'	Document has been revised "On past calls were request guidance on the use of MOBILE-based MVEBs with a MOVES-based regional emissions analysis for the transportation conformity determination. (Appendix A, page 160-Ozone and page 6-PM10)".
14	14	Executive Sum.	Conformity Tests 1st paragraph	Suggest confirming then clarifying the PACP approval date of December 14, 2023 (e.g., TPB).	The document has been revised to reflect the days of the consultative partners conference calls and approval, "per guidance from the consultative partners on later conference calls (December 14th, 2023 and March 26th, 2024) and on the approval of the Pre-Analysis Consensus Plan on March 28th, 2024 , it was recommended".
15	14	Executive Sum.	Modeling Table 2	Suggest providing the Appendices supporting the VOC, NOx, PM10 Emissions expressed in tpd.	Document has been updated and the pages of Appendix A had been added and Appendix I Mobile Inputs Parameters
16	15	Executive Sum.	Modeling Table 3	Suggest providing the Appendices supporting the Ozone Emissions expressed in tpd.	Document has been updated and the pages of Appendix A had been added and Appendix I Mobile Inputs Parameters
17	17	Section 1.6	Pre-Analysis Consensus Template	Suggest confirming then clarifying the PACP consensus date of March 28, 2024 (e.g., Consult. Partners).	The last email received from the consultative partners (FHWA) referring the PACP was received on March 28th ,2024. "FHWA-TXs comments have been addressed. We do not have additional comments on the PACP." Document has been revised.
18	18	Section 2.2	Submittal Frequency last sentence	Suggest providing the Appendix where documentation of the public comment period is included.	Document has been revised and Appendix L - Public Comment Period EPMPO Responses Matrix has been added.
19	20	Section 2.7	40 CFR 93 table Mass Transit	Suggest including the footnote similar to the citation - as it applies to more than this sub-bullet.	Document has been revised and footnote has been added.
20	20	Section 2.7	40 CFR 93 table Mass Transit	Suggest including the footnote similar to the citation - as it applies to more than this sub-bullet.	Document has been revised and footnote has been added.
21	21	Section 2.8	Section Heading	Suggest confirming use of 'RMS 2050 MTP' versus 'Amended RMS 2050 MTP.'	Document has been revised.
	21-23	Section 2.8		Additional Section 2.8 comments may follow under separate cover.	

22	23	Section 2.8	last paragraph	Since prior to Fall 2023, when the EPMPD decided a new conformity was needed, suggest confirming the importance of the following sentence to this conformity 'On <u>September 1, 2021</u> the Transportation Project Advisory Committee (TPAC) recommended the <u>RMS 2050 MTP Project List</u> to the Transportation Policy Board (TPB) for approval on <u>September 17, 2021</u> .'	Language was added to include the conformity amendment public outreach and approval process
23	23	Section 2.8	last paragraph	Since prior to Fall 2023, when the EPMPD decided a new conformity was needed, suggest confirming the importance of the following sentence to this conformity 'The 30-day Public involvement/comment period for the <u>RMS 2050 MTP, RMS 2023-2026 TIP and Transportation Conformity Report</u> was conducted from <u>January 24, 2022 to February 22, 2022</u> .'	Language was added to include the conformity amendment public outreach and approval process
24	23	Section 2.8	last paragraph	Since prior to Fall 2023, when the EPMPD decided a new conformity was needed, suggest confirming the importance of the following sentence to this conformity 'The TPB adopted the final documents on <u>March 25, 2022</u> .'	Language was added to include the conformity amendment public outreach and approval process
25	23	Section 2.9	last paragraph	Since prior to Fall 2023, when the EPMPD decided a new conformity was needed, suggest confirming the importance of the following sentence to this conformity 'At the time of the approval of the <u>RMS 2050 MTP</u> the corresponding <u>RMS 2023-2026 TIP</u> was also approved by the TPB, on <u>March 25, 2022</u> .'	Language was added to include the conformity amendment public outreach and approval process
	23	Section 2.9		Additional Section 2.9 comments may follow under separate cover.	
26	24	Section 3.1	heading	Suggest confirming use of 'RMS 2050 MTP' versus 'Amended RMS 2050 MTP.'	Document has been revised
27	24	Section 3.1	1st paragraph	Suggest confirming use of 'RMS 2050 TDM' versus 'Amended RMS 2050 TDM.'	Document has been revised
28	25	Section 3.2	heading	For section consistency, suggest revising from 'Travel Demand Model' to '2050 Travel Demand Model (2050 TDM)'.	Document has been revised
29	25	Section 3.2	1st paragraph	For section consistency, suggest revising from '2050 RMS Travel Demand Model' to '2050 TDM'.	Document has been revised
30	25	Section 3.2	1st paragraph	For section consistency, suggest revising from 'RMS TDM' to '2050 TDM'.	Document has been revised
31	26	Section 3.2.1	1st paragraph 1st sentence	For section consistency, suggest revising from 'RMS Model' to '2050 TDM'.	Document has been revised
32	26	Section 3.2.1	1st paragraph last sentence	For section consistency, suggest revising from 'RMS Model' to '2050 TDM'.	Document has been revised
33	26	Section 3.2.1	2nd paragraph	For section consistency, suggest revising from 'RMS Model' to '2050 TDM'.	Document has been revised
34	26	Section 3.2.1	3rd paragraph 1st sentence	For section consistency, suggest revising from 'RMS Model' to '2050 TDM'.	Document has been revised
35	26	Section 3.2.1	3rd paragraph last sentence	Suggest revising from 'TP&P' to 'TPP'.	Document has been revised
36	26	Section 3.2.1	4th paragraph 2nd sentence	For section consistency, suggest revising from 'RMS TDM' to '2050 TDM'.	Document has been revised
37	26	Section 3.2.1	4th paragraph 3rd sentence	For section consistency, suggest revising from 'RMS TDM' to '2050 TDM'.	Document has been revised
38	26	Section 3.2.1	5th paragraph 1st sentence	For section consistency, suggest revising from 'RMS TDM' to '2050 TDM'.	Document has been revised
39	26	Section 3.2.1	5th paragraph last sentence	For section consistency, suggest revising from 'RMS TDM' to '2050 TDM'.	Document has been revised
40	30-31	Section 4.2.8	1st paragraph 1st sentence Figure 1	Suggest updating Figure 1 consistent with the following sentence 'Using latest available vehicle classification counts (2013-2021).'	Figure has been revised
41	30	Section 4.2.8	1st paragraph	Suggest including '(TOD)' in the first sentence or spelling out 'time of day' in the later sentence.	Document has been revised
42	33	Section 4.2.14	2nd paragraph	The 2nd paragraph references a Section 4.2.16. With the removal of the Anti tampering section, and subsequent renumbering, there is not a Section 4.2.16. Suggest replacing '4.2.16' with '4.2.15'. As an aside, a blank line appears missing from the two paragraphs.	Document has been revised
43	38	Section 6.1.2	2nd paragraph 1st sentence	Suggest deleting 'new' (two occasions).	Document has been revised
44	38	Section 6.1.2	3rd paragraph	Suggest deleting 'new'.	Document has been revised
45	44	Section 6.4.1	Table 12	Suggest providing the Appendix A location of the PM10 Emissions Data expressed tpd.	Document has been revised. Footnote has been added.
46	45	Section 6.4.1	Table 13	Consistent with Table 12, suggest adding MVEB in the table. Once added, suggest providing the Appendix A location of the VOC and NOx Emission data for El Paso County	Document has been revised. Footnote and MVEB has been added.
47	45	Section 6.4.1	Table 14	Suggest revising '2017' to '2017 (baseline)'.	Document has been revised
48	49	Section 8	2nd paragraph 1st sentence	Suggest providing the Appendix where documentation of 30-day public comment period is included.	Document has been revised and Appendix L: Public Comments had been added.
49	49	Section 8	2nd paragraph 2nd sentence	Suggest providing the Appendix where documentation of the two public meetings is included.	Document has been revised and Appendix L: Public Comments had been added.

50					Section 8.0 was revised to explain that there were two different public comment periods for review of MPO documents. The first period was from February 5, 2024 to March 6, 2024 and it was for the Draft Amended RMS 2050 MTP, the corresponding Draft Transportation Conformity Report, and the Draft 2025-2028 TIP . The second period, from April 15, 2024 to May 14, 2024 was only for the revised Draft Amended RMS 2050 MTP and corresponding Conformity Document.
	49	Section 8	2nd paragraph	Suggest confirming if the public meetings included the TIP.	
51	49	Section 8	Table 15 footnote	Suggest updating the Table15 footnote to past tense from future tense.	Document has been revised
52	50	Section 8	1st paragraph 1st sentence	Suggest confirming if the 30-day comment period included the TIP.	Section 8.0 was revised to explain that there were two different public comment periods for review of MPO documents. The first period was from February 5, 2024 to March 6, 2024 and it was for the Draft Amended RMS 2050 MTP, the corresponding Draft Transportation Conformity Report, and the Draft 2025-2028 TIP . The second period, from April 15, 2024 to May 14, 2024 was only for the revised Draft Amended RMS 2050 MTP and corresponding Conformity Document.
53	50	Section 8	2nd paragraph	Since March 1, 2024 (e.g., prior to the MTP, TIP, TCR, PI) suggest confirming the importance the paragraph to this conformity vs. e.g., MTP.	The comment submitted is in reference to the Downtown 10 Executive Center to SL478 Copia project, which is a project included on the Amendment RMS2050
54	50	Section 8	3rd paragraph	Suggest that the reference is to 'Appendix K' vs. 'Appendix L'.	Document has been revised
MTP - comments to follow under separate cover.					
TIP - comments to follow under separate cover.					
Project Listing - comments to follow under separate cover.					

EP MPO Regional Transportation Conformity					
#	page	section	additional identifier	PPD Comments December 2, 2024	EPMPO Response 12/4/2024
55	6	Appendix K- Memorandum TDM Amendment	F407A-CAP	<p>Please clarify if the project should be in network year FY 2027 or FY 2032.</p> <p>Then clarify and correct Project ID (407A-CAP) if needed to (F407B-CAP).</p> <p>For reference in the project listing there is not a project with Project ID F407A-CAP.</p>	12/3/2024 - This project is F407A-CAP (CSJ 0374-02-097), which corresponds to the Montana Avenue project Phase 1. As noted in Appendix K, it is not in the RMS 2025 MTP Project List because Phase 1 let in 2019 and was then anticipated to be open to the public in 2022. However, because of delays, it is now anticipated to be open to the public in 2027. F407B-CAP (CSJ 0374-02-100) is Phase 2 of this project, and is slated to be open to the public in 2032.
56	4	Appendix C Amended RMS 2050 MTP and TCR Executive Summary:	Paragraph 1	<p><i>"The RMS 2025-2028 TIP is consistent with the Amended RMS 2050 MTP, and contains regionally significant projects to be funded with federal and non-federal funds."</i></p> <p>Please clarify if the Amended documents contain the projects pending conformity approval?</p>	12/3/2024 - The 2025 - 2028 TIP is aligned with the current RMS 2050 MTP. When the Amended RMS 2050 MTP receives conformity approval and becomes the adopted MTP, amendments will be made to the 2025 - 2028 TIP where applicable to make it consistent with the Amended RMS 2050 MTP.
57	19	Transportation Conformity Report	2.5 Regionally Significant Travel Projects	<p>EPMPO references 40 CFR 93.101 definition for regionally significant, but recommend that EPMPO better document what they have identified as regionally significant, everything modelled, or functionally classified.</p> <p>For example if the regional consensus is to include everything functionally classified that would include minor collectors too.</p>	12/4/2024 - Text was revised for clarity.
58	21-23	Transportation Conformity Report	2.8 Financial Planning for the RMS 2050 MTP	Suggest deletion of language after the first paragraph in this section to simplify documentation of MTP fiscal constraint for the TCR and point the reader to the actual MTP document.	12/3/2024 - Change has been made to the Transportation Conformity Report document
59	23	Transportation Conformity Report	2.9 Financial Planning for the RMS 2023-2026 TIP	Suggest deletion of language in this section except for the second paragraph to simplify documentation of TIP fiscal constraint for the TCR and point the reader to the actual TIP document.	12/3/2024 - Change has been made to the Transportation Conformity Report document
		Maps		No Comment	
		Public Involvement		No Comment. Appears to align with EPMPO's public involvement process.	
MTP Comments **Please note that the MTP Comments will mirror the Project Listing Comments.**					
60		Project List 2 New Conformity	General comment	<p>Suggest consistency in documenting the PE and ROW if EPMPO chooses to include it in the MTP.</p> <p>Per EPMPO/PPD (Planning) discussion on November 5, 2024, PE and ROW phases are not required to be listed in the MTP as they are required in the STIP.</p>	12/3/2024 - Noted. We will ensure consistency in how PE/ROW phases are listed in the MTP in future updates
61		Project List 2 New Conformity	General comment	Capacity projects cannot be deprogrammed from the MTP (0167-01-122) without a new conformity determination.	12/3/2024 - 0167-01-122 was never deprogrammed from the RMS 2050 MTP. In November 2022 it was moved outside of the 2023 - 2026 TIP into 2027 before being put back in 2026 in the August 2023 STIP revision. It is shown in the 2025-2028 TIP and MTP Project List as a 2026 Project and is shown as part of the 2027 Network Year
62	4	Project List 2 New Conformity	0924-06-691	<p>Please clarify why the project was not documented as a change as part of the current conformity?</p> <p>Please clarify if the EPMPO has modelled this project and considers it regionally significant?</p>	12/3/2024 - Per review performed on the model today, Dilley and Delake are modeled as part of the 2032 Network Year. Dilley was removed from the project description and limits of 0924-06-691 in February 2023 per the functional classification review, which concluded that only one of the two streets could be classified due to their size and length. Dilley will still be built with local funds, though it has been removed from the federally-funded project. The project description for 0924-06-691 will be amended in the TIP and MTP to indicate that Dilley will be constructed with Horizon TRZ funds as originally envisioned and open to the public in 2032.
63	5	Project List 2 New Conformity	2121-02-168	<p>Include the total number of lanes that will be in place once constructed as part of the project description. (from 6 lanes to 7 lanes vs. add 1-lane?)</p> <p>Please clarify if the project should be in network year FY 2027 or FY 2032.</p>	12/3/2024 - Project description will be updated on MTP project list to add "from 3/4 lanes to 4/5 lanes" (I064X-CAP)
64	5	Project List 2 New Conformity	0374-02-100	<p>Then clarify and correct Project ID (F407B-CAP) if needed.</p> <p>For reference in Appendix K this project has a project ID of F407A-CAP.</p>	12/3/2024 - See response to comment 55

65	6	Project List 2 New Conformity	2121-03-159	Include the total number of lanes that will be in place once constructed as part of the project description. (from 6 lanes to 7 lanes vs. add 1-lane?)	12/3/2024 - Project description will be updated on MTP project list to add "from 4 lanes to 5 lanes" (I065X-CAP)
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66	6	Project List 2 New Conformity	2121-01-102	Include the total number of lanes that will be in place once constructed as part of the project description. (from 6 lanes to 7 lanes vs. add 1-lane?)	12/3/2024 - Project description will be updated on MTP project list to add "from 3/4 lanes to 4/5 lanes" (I067X-CAP)
67	6	Project List 2 New Conformity	2121-03-162	Include the total number of lanes that will be in place once constructed as part of the project description. (from 6 lanes to 7 lanes vs. add 1-lane?)	12/3/2024 - Project description will be updated on MTP project list to add "from 4 lanes to 5 lanes" (I068X-CAP)
68	6	Project List 2 New Conformity	2121-03-163	Include the total number of lanes that will be in place once constructed as part of the project description. (from 6 lanes to 7 lanes vs. add 1-lane?)	12/3/2024 - Project description will be updated on MTP project list to add "from 4 lanes to 5 lanes" (I069X-CAP)
69	6	Project List 2 New Conformity	2121-04-119	Include the total number of lanes that will be in place once constructed as part of the project description. (from 6 lanes to 7 lanes vs. add 1-lane?)	12/3/2024 - Project description will be updated on MTP project list to add "from 3/4 lanes to 4/5 lanes" (I070X-CAP)
TIP Comments					
70		General comment		Capacity projects cannot be deprogrammed from the TIP (0167-01-122) without a new conformity determination.	12/3/2024 - See response to comment 61
Project Listing Comments					
Please note that the Project Listing Comments will mirror the MTP Comments.					
		General comment		Suggest consistency in documenting the PE and ROW if EPMPO chooses to include it in the MTP. Per EPMPO/PPD (Planning) discussion on November 5, 2024, PE and ROW phases are not required to be listed in the MTP as they are required in the STIP.	12/3/2024 - We will ensure consistency in how PE/ROW phases are documented in future revisions to the MTP and future MTPS
71	8	Amended RMS 2050 MTP Executive Summary	0924-06-691	Please clarify why the project was not documented as a change as part of the current conformity? Is this project modelled?	12/3/2024 - See response to comment 62
72	9	Amended RMS 2050 MTP Executive Summary	2121-02-168	Include the total number of lanes that will be in place once constructed as part of the project description. (from 6 lanes to 7 lanes vs. add 1-lane?)	12/3/2024 - See response to comment 63
73	9	Amended RMS 2050 MTP Executive Summary	0374-02-100	Please clarify if the project should be in network year FY 2027 or FY 2032. Then clarify and correct Project ID (F407B-CAP) if needed. For reference in Appendix K this project has a project ID of F407A-CAP.	12/3/2024 - See response to comment 55
74	10	Amended RMS 2050 MTP Executive Summary	2121-03-159	Include the total number of lanes that will be in place once constructed as part of the project description. (from 6 lanes to 7 lanes vs. add 1-lane?)	12/3/2024 - See response to comment 65
75	10	Amended RMS 2050 MTP Executive Summary	2121-01-102	Include the total number of lanes that will be in place once constructed as part of the project description. (from 6 lanes to 7 lanes vs. add 1-lane?)	12/3/2024 - See response to comment 66
76	10	Amended RMS 2050 MTP Executive Summary	2121-03-162	Include the total number of lanes that will be in place once constructed as part of the project description. (from 6 lanes to 7 lanes vs. add 1-lane?)	12/3/2024 - See response to comment 67
77	10	Amended RMS 2050 MTP Executive Summary	2121-03-163	Include the total number of lanes that will be in place once constructed as part of the project description. (from 6 lanes to 7 lanes vs. add 1-lane?)	12/3/2024 - See response to comment 68
78	10	Amended RMS 2050 MTP Executive Summary	2121-04-119	Include the total number of lanes that will be in place once constructed as part of the project description. (from 6 lanes to 7 lanes vs. add 1-lane?)	12/3/2024 - See response to comment 69

EP MPO Regional Transportation Conformity

#	page	section	additional identifier	PPD Comments December 5, 2024	EPMPO Responses December 13, 2024
Amendments by CSJ					
	1-5	General	Multi	In general, Phases E (e.g., PE) and/or R (e.g., ROW) should not be included without a Phase C (e.g., CAP) project.	Comment noted
	1-5	General	Multi	Phases E and/or R should not include a Network Year (NY). A NY is associated with Phase C (e.g., CAP) project If included, the phases E, R and C Network Years should be consistent. An example (vs. an exhaustive list) includes: 0924-06-563 MPO ID: A433-CAPPE2 Arterial 1	Will remove network year from PE and ROW project phases and replace with "N/A"
	1-5	General	Multi	Consistent with 40 CFR 93.126, .127 and .128, suggest use of N/A for Network Year (vs NY 2032), as appropriate. Examples (vs. an exhaustive list) include: 0924-06-541 MPO ID T093X Operating Assistance 0924-06-566 MPO ID S301D Traffic Management Center Upgrade 0924-06-574 MPO ID T092X Operating Assistance 0924-06-575 MPO ID T092X Operating Assistance 0924-06-587 MPO ID A432X Reconstruction 0924-06-606 MPO ID A137X Reconstruction 0924-06-677 MPO ID E408X Pedestrian and Site Improvements 0924-06-681 MPO ID M091X2 Safety Service Patrol-HERO 0924-06-682 MPO ID M091X3 Safety Service Patrol-HERO 0924-06-711 MPO ID M091X-4 Safety Service Patrol-HERO 0924-06-728 MPO ID E501X-2PE Hike and Bike Trail 0924-06-730 MPO ID E111X Shared Use Path 0924-06-738 MPO ID C047X Improvements Analysis 0924-06-739 MPO ID M508X Transportation Needs Assessment 0924-06-566 MPO ID S301D Traffic Management Center Upgrade MPO ID M408X TOD Design MPO ID T410X Transit Plaza MPO ID T3A Planning MPO ID T3C Capital Maintenance MPO ID T3E Security Equipment MPO ID T3G Transit Enhancements MPO ID T3H ADA Paratransit Service	Will amend project list accordingly
	1	0924-06-565	MPO ID: P004X-CAP-2	Replacing CAT 7/STBG with Cat10/CRP funds requires a Federal eligibility call.	The federal eligibility call was made via the approval of the May 2024 STIP revision when the amendment was approved on 7/12/2024

	1	0924-06-566	MPO ID: S301D	Programming CAT 5/CMAQ funds requires a Federal eligibility call.	Project is 0924-06-566 (TMC Phase 1). Extensive conversation took place between MPO and FHWA regarding the eligibility of the project for CMAQ funds prior to programming, with the ultimate conclusion that most project elements were eligible and that those that were not would be funded via local contribution. Revision was on Amendment History was to bring into 2023-2026 TIP FY 2024, which received federal approval on 11/18/2022.
79	2	0924-06-607	MPO ID: A527X-CAP-1	Suggest confirming appropriate Network Year (NY) e.g., NY 2027 v NY 2032.	NY 2032
80	2	0924-06-611	MPO ID B201X-CAP	Suggest confirming appropriate Network Year (NY) e.g., NY 2027 v NY 2032.	NY 2027
	2	0924-06-613	MPO ID: T001-3	Adding CAT 5/CMAQ funds (unless already CAT5/CMAQ) requires a Federal eligibility call.	This project has been programmed with CMAQ funds since the July 2020 STIP Instance.
81	2	0924-06-613	MPO ID: T001-3	Suggest confirming appropriate Network Year (NY) e.g., NY 2027 v NY 2032.	Network year is 2027.
82	4	0924-06-621	(none)	Suggest confirming appropriate Network Year (NY) e.g., NY 2027 v NY 2032.	NY 2032
83	2	0924-06-625	MPO ID: P219XCAP	Suggest supplying what the ' <i>project description</i> ' was before.	The following will be added to the relevant amendment history document: Previous description: "RAILROAD DR. WIDENING AND RECONSTRUCTION: ADDITION OF 1 LN. IN EACH DIR. FROM PURPLE HEART HWY. TO SHRUB OAK DR. TO INCREASE CAPACITY FROM 2 TO 4 LN. PROJECT INCLUDES ROAD REHAB AND RECONSTRUCTION OF EXISTING ROAD FROM PURPLE HEART HWY. TO SHRUB OAK DR."
84	3	0924-06-677	MPO ID E408X	Please clarify what is meant by ' <i>...Site Improvements</i> '	From project description in STIP Portal: YSLETA POE PEDESTRIAN SAFETY IMPROV: DESIGN & CONST OF PED SAFETY IMPROV;PED. DROP-OFF/PICK-UP ZONES, SHADE CANOPIES, IMPROV CROSSWALKS, PED ILLUMINATION, SIGNS, SIGNALS, TRAFFIC CALMING, STREETLIGHTS, LANDSCAPING, SEATING, SCREENING WALLS, CCTVS, BUS STOP, WAYFINDING.

85	3	0924-06-691	MPO ID: A442X	<p>Suggest supplying what the '<i>project description</i>' was before.</p> <p><u>Install 2 comments:</u> Please clarify why the project was not documented as a change as part of the current conformity? Please clarify if the EPMPO has modelled this project and considers it regionally significant?</p>	<p>Previous description: "Construction of two roadways, each with two lanes, enhanced pedestrian facilities, bike lanes and illumination to provide access to the Horizon City Transit Oriented Town Center". The previous description was to build both Dilley Rd. and Delake St. utilizing federal funds through the MPO. Both facilities are included in the TDM since they are considered regionally significant.</p> <p>The revision to this project consists in that Dilley Road will now be constructed with local funds from Horizon City instead of federal funds. The following will be added to the relevant amendment history document and the Delake Rd. project description will be updated as follows: "Construction of a two lane roadway with enhanced pedestrian facilities, bike lanes and illumination to provide access to the Horizon City Transit Oriented Town Center. Dilley Rd. will be constructed with local funds". Delake St. and Dilley Rd. remain in the TDM, which avoids a conformity trigger.</p>
86	3	0924-06-729	MPO ID: R201XPE	<p>Suggest supplying a more complete project name (e.g., '<i>street improvements</i>' is likely missing) and description.</p> <p>Suggest confirming appropriate Network Year (NY) e.g., NY 2027 v NY 2032.</p>	<p>Full project name of SUN VALLEY STREET IMPROVEMENTS GATEWAY BLVD NORTH TO KENWORTHY will be added to relevant amendment history document.</p> <p>PE Phase/Reconstruction in Network Year 2032</p>
87		2121-01-104	MPO ID: I405X-CAP-2	<p>Widenings may not be added between conformities.</p>	<p><i>This is an improvement project, not a widening project (the widening project is 2121-01-094 and the improvement project is 2121-01-104). This project, 2121-01-104 was added as a phase contained within 2121-01-094 when it became clear that funding was insufficient to do - 094 all as one phase. This project is therefore part of the original spreadsheet and model. Both are anticipated to be open to the public in the same network year 2027.</i></p>
88	3	2121-01-104	MPO ID: I405X-CAP-2	<p>Suggest confirming appropriate Network Year (NY) e.g., NY 2027 v NY 2032.</p>	<p>NY 2027</p>

89	3	2121-02-166	MPO ID: I063X-CAP	Suggest supplying what the ' <i>project description</i> ' was before.	The following will be added to the relevant amendment history document: Previous description: WIDEN FROM 3/5 TO 5/7 LANES EACH DIRECTION (INCLUDING ONE GENERAL PURPOSE LANE AND ONE ADAPTIVE LANE IN EACH DIRECTION), ADD 2-LANE FRONTAGE ROADS EACH DIRECTION, RAMP AND OPERATIONAL IMPROVEMENTS, AND BIKE/PED PATHS.
90		2121-03-146	MPO ID I006X15A	Suggest clarifying that work in a. is the same as work in b.	The November 2022 revision moved the project from 2025 to 2027 so that it was outside of the TIP years for fiscal constraint. The January 2024 revision then moved the project from 2027 to 2029 in order to keep it outside of the TIP years when the 2025-2028 TIP was adopted, also for fiscal constraint. No changes were made to the scope or limits of the project.
91	4	3592-01-009	MPO ID: P136X	Suggest supplying what the ' <i>project description</i> ' was before.	The following will be added to the relevant amendment history document: Previous description: "SH 178 OPERATIONAL IMPROVEMENTS: INTERCHANGE IMPROVEMENTS TO INCLUDE GRADE SEPARATION(S), REBUILD I-10 OVERPASS, U-TURNS, 4 DIRECT CONNECTORS (DC) (3, 2-LANE DC AND ONLY EB TO WB DC WILL BE 1-LANE)"
92	4	(none)	MPO ID: A437A	Extensions of roadways may not be added between conformities	This is a phase of a project shown in Nov 2022 spreadsheet used for conformity determination as occurring in 2030 (Network Year 2032). February 2023 revision referenced in Amendment History moves project into 2023-2026 TIP years in 2023; constructed with all local contribution
93	5	(none)	MPO ID: T31-11	Suggest clarifying the ' <i>FTA 5339 formula work</i> ' including magnitude. Suggest confirming appropriate Network Year (NY) e.g., NY 2027 v NY 2032.	Per STIP Portal: FY 2024 FTA 5339 Funding: For the purchase of buses and facility enhancements incl. equipment such a ADP hardware/software and security related needs, ticket vending machines and sales related software. Capitalized maintenance incl rebuilds, bus shelters SunMetro's response: The description was provided to allow Sun Metro flexibility in optional selection of capital projects but Sun Metro is not purchasing buses with this funding.This project has been used for: Shelters- to be installed in new locations or used to replace existing ones when damaged. Rehab/renovate facilities- Small projects, safety upgrades, and general repairs as needed. This type of project is not coded. Network Year N/A

94	5	(none)	MPO ID: T3J	<p>Suggest clarifying the '<i>FTA 5307 formula work</i>' including magnitude.</p> <p>Suggest confirming appropriate Network Year (NY) e.g., NY 2027 v NY 2032.</p>	<p><i>Bus Purchase (5307): Fixed Route and BRIO Buses - REPLACEMENT</i></p> <p>This type of project is not coded. Network Year N/A.</p>
Texas Transit Amendments by MPO ID					
	1-3	General	Multi	<p>Consistent with 40 CFR 93.126, .127 and .128, suggest use of N/A for NY (vs NY 2032), as appropriate.</p> <p>Examples (vs. an exhaustive list) include: T010-22SM: Technology Upgrade T010-23SM: Technology Upgrade T093X 0924-06-541 Operating Assistance T2A JARC</p>	Change will be made to MTP Project List to replace Network Year with "N/A"
95	1		T010-22PA	Suggest supplying the magnitude of ' <i>purchase of ADA compliant vehicles</i> ' e.g., replacement and/or minor expansion.	Application states that vehicles will replace existing fleet vehicles that are no longer running as well as address their expanding paratransit service needs
96	1		T010-22S	Suggest supplying the magnitude of ' <i>purchase of ADA compliant vehicles</i> ' e.g., replacement and/or minor expansion.	Application states that the project will increase their ADA paratransit services
97	1		T010-22SCRTD	Suggest supplying the magnitude of ' <i>purchase of ADA compliant vehicles</i> ' e.g., replacement and/or minor expansion.	Application states that the project will establish ADA paratransit service to serve qualified residents within SCRTD's the portion of service area that are adjacent to their Texas-serving routes who are not able to use SCRTD's fixed route bus service
98	1		T010-23PA	Suggest supplying the magnitude of ' <i>purchase of ADA compliant vehicles</i> ' e.g., replacement and/or minor expansion.	Application states that vehicles will replace existing fleet vehicles that are no longer running as well as address their expanding paratransit service needs
99	1		T010-23S	Suggest supplying the magnitude of ' <i>purchase of ADA compliant vehicles</i> ' e.g., replacement and/or minor expansion.	Application states that the project will increase their ADA paratransit services
100	2		T3A	Suggest supplying what ' <i>Capital</i> ' was removed.	Sun Metro's response: It was just a reclassification. It was previously classified as capital but the short-range planning funding has been used for planning and admin support personnel and planning studies.
101	2		T3B	Suggest supplying what ' <i>Capital</i> ' was deprogrammed.	Sun Metro's response: computers and software were deprogrammed as Sun Metro decided to use the 5339 apportionment for other capital items including shelters and facility enhancements (T3I-10), support vehicles (T3F), and transit enhancements (T3G). The support vehicles associated with T3F are not used to transport passengers and are replacement of existing fleet.
102	2		T3C	Suggest supplying what the ' <i>project description</i> ' was before.	The following will be added to the relevant amendment history document: Previous description: Capital Maintenance: Capital Maintenance

103	2		T3E	Suggest supplying what the ' <i>project description</i> ' was before.	The following will be added to the relevant amendment history document: Previous description: Security Equipment: Security Program
104	2		T3F	Suggest supplying what the ' <i>project description</i> ' was before.	The following will be added to the relevant amendment history document: Previous description: Support Vehicles/Bus Rehab (5339): Support Vehicles/Bus Rehab
105	2		T3G	Suggest supplying what the ' <i>project description</i> ' was before.	The following will be added to the relevant amendment history document: Previous description: Transit Enhancements (5339): Transit Enhancements
106	2		T3H	Suggest supplying what the ' <i>project description</i> ' was before.	The following will be added to the relevant amendment history document: Previous description: ADA ParaTransit: Provide ADA Para Transit Service
107	2		T3I	Suggest supplying the magnitude of ' <i>buses and bus facilities</i> ' e.g., replacement and/or minor expansion.	Sun Metro's response: The description was provided to allow Sun Metro flexibility in optional selection of capital projects but Sun Metro is not purchasing buses with this funding. This project has been used for: Shelters- to be installed in new locations or used to replace existing ones when damaged. Rehab/renovate facilities- Small projects, safety upgrades, and general repairs as needed.
108	3		T3J	Suggest supplying the magnitude of ' <i>bus purchase</i> ' e.g., replacement and/or minor expansion.	Sun Metro's response: Replacement buses
New Mexico Amendment History by CN					
	1-3	General	Multi	Consistent with 40 CFR 93.126, .127 and .128, suggest use of N/A for NY (vs NY 2032), as appropriate. Examples (vs. an exhaustive list) include: Intersection Lighting CN E100380/MPO ID S601X A/B Alignment Study CN E100430/MPO ID P624X Planning CN E100452/MPO ID T614C Security Equipment CN E100453/MPO ID T614D Sidewalk Improvements CN E100460/MPO ID E608X Preventative Maintenance CN E100470/MPO ID T615A Pavement Resurfacing CN E100471/MPO ID T615B JARC CN E100472/MPO ID T615C Operating Assistance CN E100473/MPO ID T615D Maintenance Facility Equipment CN E100474/MPO ID T615E Security Fencing CN E100475/MPO ID T615F Solar Bus Chargers CN E100480/MPO ID T616A Multiuse Trail CN E100490/MPO ID E609A Multiuse Trail CN E100500/MPO ID E610A	Will update MTP Project List Network Year to "N/A"
109	1	CN E100321	MPO ID M642X-PE2 P621X-CAP	Suggest confirming appropriate Network Year (NY) e.g., NY 2027 v NY 2032.	Project P621X-CAP in NY 2032

110	2	CN E100400	MPO ID T611X	Suggest confirming what is included within 'Bus and Bus Facilities'. Depending on the response, suggest NY or N/A e.g., replacement and/or minor expansion.	SCRTD's response: Grant included two electric Gillig buses to be used in Sunland Park. Buses will be replacements for existing service Network Year N/A
111	2	CN E100420	MPO ID T612X	Suggest confirming what is included within 'Electric Buses Acquisition'. Depending on the response, suggest NY or N/A e.g., replacement and/or minor expansion.	SCRTD's response: Electric Gillig buses will be doubled up to replace existing gasoline/diesel buses (AM/PM operation) in order to ensure electric range is sufficient and to lower the annual mileage per vehicle. They may be used to increase frequency as well, depending on business needs. Network Year N/A
112	2	CN E100421	MPO ID T612B	Suggest confirming what is included within 'Electric Buses Acquisition'. Depending on the response, suggest NY or N/A e.g., replacement and/or minor expansion.	SCRTD's response: Electric Gillig buses will be doubled up to replace existing gasoline/diesel buses (AM/PM operation) in order to ensure electric range is sufficient and to lower the annual mileage per vehicle. They may be used to increase frequency as well, depending on business needs. Network Year N/A
113	2	CN E100422	MPO ID T612C	Suggest confirming what is included within 'Electric Buses Acquisition'. Depending on the response, suggest NY or N/A e.g., replacement and/or minor expansion.	SCRTD's response: Electric Gillig buses will be doubled up to replace existing gasoline/diesel buses (AM/PM operation) in order to ensure electric range is sufficient and to lower the annual mileage per vehicle. They may be used to increase frequency as well, depending on business needs. Network Year N/A
114	2	CN E100440	MPO ID T613A	Suggest confirming what is included within 'Fleet Vehicle Purchase'. Depending on the response, suggest NY or N/A e.g., replacement and/or	SCRTD's response: Expansion of bus fleet with new electric buses Network Year N/A
115	2	CN E100441	MPO ID T613B	Suggest confirming what is included within 'Capital Maintenance'. Depending on the response, suggest NY or N/A.	SCRTD's response: This is solely for maintenance of capital. No new vehicles. Network Year N/A
116	2	CN E100450	MPO ID T614A	Suggest confirming what is included within 'Bus Purchase'. Depending on the response, suggest NY or N/A e.g., replacement and/or minor expansion.	SCRTD's response: Expansion of bus fleet with new electric buses Network Year N/A
117	2	CN E100451	MPO ID T614B	Suggest confirming what is included within 'Capital Maintenance'. Depending on the response, suggest NY or N/A.	SCRTD's response: This is solely for maintenance of capital. No new vehicles. Network Year N/A

EPMPO Updates

01/02/2025

#	CSJ	Project ID	Project Name	Description	Limits
1	E100391	A606X	Border Highway Connector (BHC) - Construction Phase	<p>The project description and limits were revised based on the latest project development information received from NMDOT and NMBA. These revisions do not affect the TDM and emissions analysis included in the Transportation Conformity Report that was submitted in June 2024. Please refer to Revised Appendix K - Revised Memorandum TDM Amendment for more details.</p> <p>Prior description: The Border Highway Connector (BHC) will be a new 4 lane NMState HighwayConnection NM 136 with NM 273 (McNutt Rd.)</p> <p>Revised description: Construct new location 4-lane divided facility.</p>	<p>Prior limits: From: NM 136, MP:TBD To: NM273, MP:TBD</p> <p>Revised limits: From: NM 136 at MP 1.79 To: NM273 at MP 1.49 (Existing intersection at Sunland Park Dr.)</p>
2		A607X	Sunland Park Drive Extension	<p>The project description and limits were revised as follows:</p> <p>Prior description: Widen from 2 to 3 lanes in each direction from State Line to McNutt and build/widen 4-lane roadway (2-lanes each direction) from McNutt to Sunland Park POE. Scope includes Design Construction and Construction Management of roadway widening and new roadway construction, drainage, erosion control, and permanent signing & striping</p> <p>Revised description: Widen from 2 to 3 lanes in each direction from State Line to McNutt and build/widen 4-lane roadway (2-lanes each direction) from McNutt Border Highway Connector to Sunland Park POE. Scope includes Design Construction and Construction Management of roadway widening and new roadway construction, drainage, erosion control, and permanent signing & striping". Please refer to Revised Appendix K- Memorandum TDM Amendment for more details.</p>	<p>Prior limits: From: Texas State Line To: Sunland Park POE</p> <p>Revised limits: From: Texas State Line To: McNutt Rd and From: Border Highway Connector To: Sunland Park POE</p>
3		R615X	NM 498 (Anapra)	<p>The project description and limits were revised as follows:</p> <p>Prior description: Reconstruction of an existing 2-lane roadway. Scope includes Design, Construction and Construction Management of roadway reconstruction, drainage, erosion control, and permanent signing & striping. Shared use path to be included.</p> <p>Revised description: Reconstruction of an existing 2-lane roadway. Widening of an existing roadway from 2 lanes to 4 lanes. Scope includes Design, Construction and Construction Management of roadway reconstruction, drainage, erosion control, and permanent signing & striping. Shared use path to be included." <i>Please refer to Revised Appendix K - Memorandum TDM Amendment for more details.</i></p>	<p>No change in limits From: McNutt Road To: Sunland Park Extension</p>

EP MPO Regional Transportation Conformity					
Installment 1					
#	page	section	additional identifier	PPD Comments November 7, 2024 and February 12, 2025	EPMPO Responses November 21, 2024 and February 17,2025
13	13-14	Executive Sum.	Conformity Tests 1st paragraph	<p>November 7, 2024 comment. Suggest revising the following sentence '<i>On past calls were request guidance on the use of MOBILE-based MVEBs with a MOVES-based regional emissions analysis for the transportation conformity determination as MOVES-based MVEBs do not currently exist in the SIP.</i>'</p> <p>February 12, 2025 Follow-up comment. Suggest EPMPO reword the sentence.</p>	<p>EPMPO November 21, 2024 response. Document has been revised "<i>On past calls were request guidance on the use of MOBILE-based MVEBs with a MOVES-based regional emissions analysis for the transportation conformity determination. (Appendix A, page 160-Ozone and page 6-PM10)</i>" .</p> <p>EPMPO February 17, 2025 Follow-up Response . Document has been revised. "<i>EPMPO had requested guidance on the use of MOBILE-based MVEBs with a MOVES-based regional emissions analysis for the transportation conformity determination (Appendix A, page 160-Ozone and page 6-PM10)</i>" "</p>
16	15	Executive Sum.	Modeling Table 3	<p>November 7, 2024 comment. Suggest providing the Appendices supporting the Ozone Emissions expressed in tpd.</p> <p>February 12, 2025 Follow-up comment. It does not appear that Appendix A was added to the footnotes.</p>	<p>EPMPO November 21, 2024 response. Document has been updated and the pages of Appendix A had been added and Appendix I Mobile Inputs Parameters</p> <p>EPMPO February 17, 2025 Follow-up Response. Document has been revised to add Appendix A to the footnote - Applicable State Improvement Plan (SIP) - 2015 Ozone NAAQS Designation Recommendation Report (Appendix A: page 108)"</p>
19	20	Section 2.7	40 CFR 93 table Mass Transit	<p>November 7, 2024 comment. Suggest including the footnote similar to the citation - as it applies to more than this sub-bullet.</p> <p>February 12, 2025 Follow-up comment. Suggest including the footnote similar to the citation e.g., Rehabilitation of transit vehicles¹.</p>	<p>EPMPO November 21, 2024 response. Document has been revised and footnote has been added.</p> <p>EPMPO February 17, 2025 Follow-up Response. Document has been revised</p>
20	20	Section 2.7	40 CFR 93 table Mass Transit	<p>November 7, 2024 comment. Suggest including the footnote similar to the citation - as it applies to more than this sub-bullet.</p> <p>February 12, 2025 Follow-up comment. Suggest including the footnote similar to the citation e.g., Purchase of new buses and rail cars to replace existing vehicles or for minor expansions of the fleet¹.</p>	<p>EPMPO November 21, 2024 response. Document has been revised and footnote has been added.</p> <p>EPMPO February 17, 2025 Follow-up Response. Document has been revised.</p>
22	23	Section 2.8	last paragraph	<p>November 7, 2024 comment. Since prior to Fall 2023, when the EPMPO decided a new conformity was needed, suggest confirming the importance of the following sentence to this conformity '<i>On September 1, 2021 the Transportation Project Advisory Committee (TPAC) recommended the RMS 2050 MTP Project List to the Transportation Policy Board (TPB) for approval on September 17, 2021.</i>'</p> <p>February 12, 2025 Follow-up comment. Please provide the location of the added language as it appears struck from Section 2.8.</p>	<p>EPMPO November 21, 2024 response. Language was added to include the conformity amendment public outreach and approval process</p> <p>EPMPO February 17, 2025 Follow-up Response. Language struck per Installment 2, Comment 58, which requested that the paragraphs containing that language be deleted.</p>
23	23	Section 2.8	last paragraph	<p>November 7, 2024 comment. Since prior to Fall 2023, when the EPMPO decided a new conformity was needed, suggest confirming the importance of the following sentence to this conformity '<i>The 30-day Public involvement/comment period for the RMS 2050 MTP, RMS 2023-2026 TIP and Transportation Conformity Report was conducted from January 24, 2022 to February 22, 2022.</i>'</p> <p>February 12, 2025 Follow-up comment. Please provide the location of the added language as it appears struck from Section 2.8.</p>	
24	23	Section 2.8	last paragraph	<p>November 7, 2024 comment. Since prior to Fall 2023, when the EPMPO decided a new conformity was needed, suggest confirming the importance of the following sentence to this conformity '<i>The TPB adopted the final documents on March 25, 2022.</i>'</p> <p>February 12, 2025 Follow-up comment. Please provide the location of the added language as it appears struck from Section 2.8.</p>	<p>EPMPO November 21, 2024 response. Language was added to include the conformity amendment public outreach and approval process</p> <p>EPMPO February 17, 2025 Follow-up Response. Language struck per Installment 2, Comment 58, which requested that the paragraphs containing that language be deleted.</p>
25	23	Section 2.9	last paragraph	<p>November 7, 2024 comment. Since prior to Fall 2023, when the EPMPO decided a new conformity was needed, suggest confirming the importance of the following sentence to this conformity '<i>At the time of the approval of the RMS 2050 MTP the corresponding RMS 2023-2026 TIP was also approved by the TPB, on March 25, 2022.</i>'</p> <p>February 12, 2025 Follow-up comment. Please provide the location of the added language as it appears struck from Section 2.9.</p>	<p>EPMPO November 21, 2024 response. Language was added to include the conformity amendment public outreach and approval process</p> <p>EPMPO February 17, 2025 Follow-up Response. Language struck per Installment 2, Comment 59, which requested that the paragraphs containing that language be deleted.</p>
Installment 2					
#	page	section	additional identifier	PPD Comments December 2, 2024 and February 12, 2025	EPMPO Responses November 21, 2024 and February 17,2025
62	4	Project List 2 New Conformity	0924-06-691	<p>December 2, 2024 comment. Please clarify why the project was not documented as a change as part of the current conformity?</p> <p>Please clarify if the EPMPO has modelled this project and considers it regionally significant?</p> <p>February 12, 2025 Follow-up comment. Suggest EPMPO provide the treatment of the facility(ies) within the travel demand model.</p>	<p>EPMPO December 4, 2024 response. 12/3/2024 - Per review performed on the model today, Dilley and Delake are modeled as part of the 2032 Network Year. Dilley was removed from the project description and limits of 0924-06-691 in February 2023 per the functional classification review, which concluded that only one of the two streets could be classified due to their size and length. Dilley will still be built with local funds, though it has been removed from the federally-funded project. The project description for 0924-06-691 will be amended in the TIP and MTP to indicate that Dilley will be constructed with Horizon TRZ funds as originally envisioned and open to the public in 2032.</p> <p>EPMPO February 17, 2025 Follow-up Response. Dilley and Delake are modeled as parallel streets limited by Rodman St. and Darrington Rd., each with two lanes (one in each direction) in the Network Year 2032.</p>



EP MPO Regional Transportation Conformity					
Installment 3					
#	page	section	additional identifier	PPD Comments December 5, 2024 and February 13, 2025	EPMPO Responses December 13, 2024 and March 7, 2025
	2	0924-06-613	MPO ID: T001-3	<p>December 5, 2024 comment. Adding CAT 5/CMAQ funds (unless already CATS/CMAQ) requires a Federal eligibility call.</p> <p>February 13, 2025 Follow-up comment. Please confirm the scope of work (e.g., the establishment of new service) and the YOE.</p>	<p>EPMPO December 13, 2024 response. This project has been programmed with CMAQ funds since the July 2020 STIP Instance.</p> <p>EPMPO Follow-up response March 7, 2025. Note: YOE was 2024 for this project. Scope: From the applicant: "The El Paso County Transit program would provide public transportation access to unincorporated communities in El Paso County Region... The new transit service would provide new routes, new bus shelters, sidewalks and a more reliable bus system required to provide a safer and more efficient daily commute for passengers." YOE in the MTP and STIP is shown as 2024 (there was an administrative amendment in February of 2023 to move the project from 2023 to 2024). Network year was updated to N/A in an attempt to be consistent with various comments concerning network year for transit projects and MPO's understanding of relevant CFR</p>
81	2	0924-06-613	MPO ID: T001-3	<p>December 5, 2024 comment. Suggest confirming appropriate Network Year (NY) e.g., NY 2027 v NY 2032.</p> <p>February 13, 2025 Follow-up comment. Please confirm the NY as the Project Listing has N/A.</p>	<p>EPMPO December 13, 2024 response. Network year is 2027.</p> <p>EPMPO Follow-up response March 7, 2025. Network year was changed back to 2027 in the project lists after confirming. EPMPO held a meeting with El Paso County during the development of the RMS2050 MTP and El Paso County's routes were coded on the Route System accordingly "Best Practices and Guidelines for El Paso County Rural Public Transportation to Identify Potential Stop Locations and Route Configurations" Report.</p>
85	3	0924-06-691	MPO ID: A442X	<p>December 5, 2024 comment. Suggest supplying what the 'project description' was before.</p> <p><u>Install 2 comments:</u> Please clarify why the project was not documented as a change as part of the current conformity? Please clarify if the EPMPO has modelled this project and considers it regionally significant?</p> <p>February 13, 2025 Follow-up comment. With an assumed construction cycle of two years, please clarify why the YOE is 2025 and the NY is 2032 (vs. NY 2027).</p>	<p>EPMPO December 13, 2024 response. Previous description: "Construction of two roadways, each with two lanes, enhanced pedestrian facilities, bike lanes and illumination to provide access to the Horizon City Transit Oriented Town Center". The previous description was to build both Dilley Rd. and Delake St. utilizing federal funds through the MPO. Both facilities are included in the TDM since they are considered regionally significant.</p> <p>The revision to this project consists in that Dilley Road will now be constructed with local funds from Horizon City instead of federal funds. The following will be added to the relevant amendment history document and the Delake Rd. project description will be updated as follows: "Construction of a two lane roadway with enhanced pedestrian facilities, bike lanes and illumination to provide access to the Horizon City Transit Oriented Town Center. Dilley Rd. will be constructed with local funds". Delake St. and Dilley Rd. remain in the TDM, which avoids a conformity trigger.</p> <p>EPMPO Follow-up response March 7, 2025. Project was moved to FY 2027 in in February 2025 STIP instance. Discussions leading to this move began this summer when project sponsor began expressing concerns that the design phase agreement with HUD was taking longer than anticipated, and future phases may be impacted. Based those discussions, NY 2032 was determined to be a more prudent option than NY 2027</p>
86	3	0924-06-729	MPO ID: R201XPE	<p>December 5, 2024 comment. Suggest supplying a more complete project name (e.g., 'street improvements' is likely missing) and description.</p> <p>Suggest confirming appropriate Network Year (NY) e.g., NY 2027 v NY 2032.</p> <p>February 13, 2025 Follow-up comment. With NY 2032, please clarify why the Project Listing includes NY: N/A.</p>	<p>EPMPO December 13, 2024 response. Full project name of SUN VALLEY STREET IMPROVEMENTS GATEWAY BLVD NORTH TO KENWORTHY will be added to relevant amendment history document. PE Phase/Reconstruction in Network Year 2032</p> <p>EPMPO Follow-up response March 7, 2025. Consistent with Installment 3, General Comment 2, Network year for R201XPE is N/A because this project is a PE Phase only. However, R201X (no PE) should be Network Year 2032, and the project list documents have been amended accordingly.</p>
87		2121-01-104	MPO ID: I405X-CAP-2	<p>December 5, 2024 comment. Widenings may not be added between conformities.</p> <p>February 13, 2025 Follow-up comment. Please clarify the HWY NAME, LIMITS, SCOPE OF WORK, PHASING, and NYs.</p> <p>BACKGROUND. FM 1905 to Spur 37 is within the limits of FM 1905 to SH 20 (Mesa). Both projects have the same limits and same scope of work. The name of the project is different; unsure of phasing. NY: 2027; YOE: 2024</p>	<p>EPMPO December 13, 2024 response. This is an improvement project, not a widening project (the widening project is 2121-01-094 and the improvement project is 2121-01-104). This project, 2121-01-104 was added as a phase contained within 2121-01-094 when it became clear that funding was insufficient to do -094 all as one phase. This project is therefore part of the original spreadsheet and model. Both are anticipated to be open to the public in the same network year 2027.</p> <p>EPMPO Follow-up response March 7, 2025. Note: 2121-01-094 let in FY 2022 and 2121-01-104 let in 2024. Correction to previous response: -104 was added as a project contained within the limits of 2121-01-094 when it became clear that available funding was insufficient to do the entire scope of the original -094 all at once in FY 2022. Both projects are part of the original -094 as shown in the spreadsheet and model, and both are anticipated to be open in 2027. Most (7.41) miles of widening occurred in -094, and a 3.78 mile portion was completed as part of -104. Other work for project -104, such as drainage facility and ramp reconstruction, adding lighting, and ITS elements occurred within the common project limits for both projects. Per the project sponsor, widening (from 4 lanes to 6 lanes) occurred for -094 on the 7.41 mile span between IH 10 CL Sta. 200 + 00.00 and SH 20 (Mesa St), and for -104 occurred for the 3.78 mile span between the Texas/New Mexico state line and IH 10 CL Sta 200 + 00.00.</p>
88	3	2121-01-104	MPO ID: I405X-CAP-2	<p>December 5, 2024 comment. Suggest confirming appropriate Network Year (NY) e.g., NY 2027 v NY 2032.</p> <p>February 13, 2025 Follow-up comment. See Follow-up Comment 87.</p>	<p>EPMPO December 13, 2024 response. NY 2027</p> <p>EPMPO Follow-up response March 7, 2025. See Follow-up Response 87.</p>

#	page	section	additional identifier	PPD Comments December 5, 2024 and February 13, 2025	EPMPO Responses December 13, 2024 and March 7, 2025
89	3	2121-02-166	MPO ID: I063X-CAP	<p>December 5, 2024 comment. Suggest supplying what the 'project description' was before.</p> <p>February 13, 2025 Follow-up comment. Suggest confirming that the project was modeled correctly.</p>	<p>EPMPO December 13, 2024 response. The following will be added to the relevant amendment history document: Previous description: WIDEN FROM 3/5 TO 5/7 LANES EACH DIRECTION (INCLUDING ONE GENERAL PURPOSE LANE AND ONE ADAPTIVE LANE IN EACH DIRECTION), ADD 2-LANE FRONTAGE ROADS EACH DIRECTION, RAMP AND OPERATIONAL IMPROVEMENTS, AND BIKE/PED PATHS.</p> <p>EPMPO Follow-up response March 7, 2025. The project is coded in the TDM based on schematics provided by TxDOT-ELP. The TDM runs and corresponding emissions analysis are adequate and correct.</p>
91	4	3592-01-009	MPO ID: P136X	<p>December 5, 2024 comment. Suggest supplying what the 'project description' was before.</p> <p>February 13, 2025 Follow-up comment. Suggest confirming that the project was modeled correctly including the reflection of direct connectors.</p>	<p>EPMPO December 13, 2024 response. The following will be added to the relevant amendment history document: Previous description: "SH 178 OPERATIONAL IMPROVEMENTS: INTERCHANGE IMPROVEMENTS TO INCLUDE GRADE SEPARATION(S), REBUILD I-10 OVERPASS, U-TURNS, 4 DIRECT CONNECTORS (DC) (3, 2-LANE DC AND ONLY EB TO WB DC WILL BE 1-LANE)"</p> <p>EPMPO Follow-up response March 7, 2025. Link 10136 is a 2-lane principal arterial, serving as a main lane in the 2032, 2040, and 2050 networks. The model has been updated to correct the traffic flow direction on this link, as the previous direction prevented the continuous flow of traffic in the eastbound direction lanes through this link. The model has been updated and re-run. After the updates were made to the TDM, the STREAM was used for emission inventory showing the differences of VMT and emissions on Table 1. The VMTs in Table 1 are network VMTs before and after the network corrections. The difference is from the network correction EPMPO enhanced the Sketch Tool for Regional Emission (STREAM), to make refinements to the computations for all pollutants and obtain results that are within 10% of comparable official emissions inventory values. The table 2 shows the comparison between the official emissions inventory values presented on the Transportation Conformity Report (TCR) approved by the TPB on Friday, June 21 2024, and the emission inventory values using the STREAM. The VMTs differences in Table 2 are intrazonal VMTs. In EI modeling, the intrazonal VMTs are included but in the sketch planning tool only network VMTs are included. But the sketch planning tool emissions are calibrated and validated to the</p>
92	4	(none)	MPO ID: A437A	<p>December 5, 2024 comment. Extensions of roadways may not be added between conformities</p> <p>February 13, 2025 Follow-up comment. With an assumed construction cycle of two years, please clarify why the YOE is 2023 and the NY is 2032.</p>	<p>EPMPO December 13, 2024 response. This is a phase of a project shown in Nov 2022 spreadsheet used for conformity determination as occurring in 2030 (Network Year 2032). February 2023 revision referenced in Amendment History moves project into 2023-2026 TIP years in 2023; constructed with all local contribution</p> <p>EPMPO Follow-up response March 7, 2025. Sponsor informed us that design build contract was just awarded. Given that project has yet to be designed, MPO is not confident that it will be open to the public by 2027</p>
93	5	(none)	MPO ID: T3I-11	<p>December 5, 2024 comment. Suggest clarifying the 'FTA 5339 formula work' including magnitude.</p> <p>Suggest confirming appropriate Network Year (NY) e.g., NY 2027 v NY 2032.</p> <p>February 13, 2025 Follow-up comment. Please clarify the project's location in the redlined MTP Project Listing.</p>	<p>EPMPO December 13, 2024 response. Per STIP Portal: FY 2024 FTA 5339 Funding: For the purchase of buses and facility enhancements incl. equipment such a ADP hardware/software and security related needs, ticket vending machines and sales related software. Capitalized maintenance incl rebuilds, bus shelters</p> <p>Sun Metro's response: The description was provided to allow Sun Metro flexibility in optional selection of capital projects but Sun Metro is not purchasing buses with this funding. This project has been used for: Shelters- to be installed in new locations or used to replace existing ones when damaged. Rehab/renovate facilities- Small projects, safety upgrades, and general repairs as needed. This type of project is not coded. Network Year N/A</p> <p>EPMPO Follow-up response March 7, 2025. The project location is citywide (City of El Paso). Project list documents have been updated.</p>
94	5	(none)	MPO ID: T3J	<p>December 5, 2024 comment. Suggest clarifying the 'FTA 5307 formula work' including magnitude.</p> <p>Suggest confirming appropriate Network Year (NY) e.g., NY 2027 v NY 2032.</p> <p>February 13, 2025 Follow-up comment. Suggest clarifying in the MTP Project Listing that the project is for replacement.</p>	<p>EPMPO December 13, 2024 response. <i>Bus Purchase (5307): Fixed Route and BRIO Buses - REPLACEMENT</i> This type of project is not coded. Network Year N/A.</p> <p>EPMPO Follow-up response March 7, 2025. Proposed Name: Replacement Bus Purchase (5307) YOE: FYs 2023, 2024, 2025, 2026 EPMPO proposes to rename FY 2026 as it is the only year of this project that has not yet passed.</p>
	1-3	General	Multi	<p>December 5, 2024 comment. Consistent with 40 CFR 93.126, .127 and .128, suggest use of N/A for NY (vs NY 2032), as appropriate.</p> <p>Examples (vs. an exhaustive list) include: T010-22SM: Technology Upgrade T010-23SM: Technology Upgrade T093X 0924-06-541 Operating Assistance T2A JARC</p> <p>February 13, 2025 Follow-up comment. The deprogramming of the JARC may / may not be treated administratively depending on the Scope of Work.</p>	<p>EPMPO December 13, 2024 response. Change will be made to MTP Project List to replace Network Year with "N/A"</p> <p>EPMPO Follow-up response March 7, 2025. Project T2A was formally deprogrammed in the May 2023 STIP instance, which was approved on June 1, 2023 This project provided service in NE and Far East El Paso in areas with large employers and no fixed route service. While this project was deprogrammed, the reverse commute service in this areas has continued with other funds (sales tax revenue). The deprogramming amendment was a cleanup to reflect that this work was no longer happening under this particular project and funding.</p>

#	page	section	additional identifier	PPD Comments December 5, 2024 and February 13, 2025	EPMPO Responses December 13, 2024 and March 7, 2025
95	1		T010-22PA	<p>December 5, 2024 comment. Suggest supplying the magnitude of 'purchase of ADA compliant vehicles' e.g., replacement and/or minor expansion.</p> <p>February 13, 2025 Follow-up comment. Suggest confirming that the project is consistent with N/A and that there is consistency between the MTP and TIP.</p>	<p>EPMPO December 13, 2024 response. Application states that vehicles will replace existing fleet vehicles that are no longer running as well as address their expanding paratransit service needs</p> <p>EPMPO Follow-up response March 7, 2025. <u>YOE was 2023.</u> Not coded in travel demand model. MTP project list appears to be consistent with STIP (name, description, TPC, YOE confirmed to match). Sponsor has an existing fleet of 39 transit vehicles and this project would replace two of those as well as provide operations funds to pay for drivers, dispatch software, and program administration.</p>
96	1		T010-22S	<p>December 5, 2024 comment. Suggest supplying the magnitude of 'purchase of ADA compliant vehicles' e.g., replacement and/or minor expansion.</p> <p>February 13, 2025 Follow-up comment. Please clarify why the YOE is 2023 and the NY is 2032 (vs. NY 2027).</p>	<p>EPMPO December 13, 2024 response. Application states that the project will increase their ADA paratransit services</p> <p>EPMPO Follow-up response March 7, 2025. <u>YOE was 2023.</u> Not coded in travel demand model. Will change to N/A. Socorro's existing fleet is 3 Dodge vans, which provide on-demand paratransit service. The drivers for these vehicles are their parks and recreation staff, who fold in on-demand paratransit service to their low income elderly patrons with their other duties. Project is to purchase one ADA-accessible vehicle and fund one dedicated transit employee.</p>
97	1		T010-22SCRTD	<p>December 5, 2024 comment. Suggest supplying the magnitude of 'purchase of ADA compliant vehicles' e.g., replacement and/or minor expansion.</p> <p>February 13, 2025 Follow-up comment. Please clarify why the YOE is 2023 and the NY is 2022.</p> <p>Also, suggest verifying Texas Transit Amendments by MPO ID listing against MTP Project Listing e.g., change MPO ID.</p>	<p>EPMPO December 13, 2024 response. Application states that the project will establish ADA paratransit service to serve qualified residents within SCRTD's the portion of service area that are adjacent to their Texas-serving routes who are not able to use SCRTD's fixed route bus service</p> <p>EPMPO Follow-up response March 7, 2025. <u>YOE was 2023.</u> Not coded in model. Has been changed to N/A. MPO ID fixed in ORIGINAL project list (Clean, Redline). Was correct in CURRENT project list (Clean, Redline).</p>
98	1		T010-23PA	<p>December 5, 2024 comment. Suggest supplying the magnitude of 'purchase of ADA compliant vehicles' e.g., replacement and/or minor expansion.</p> <p>February 13, 2025 Follow-up comment. Please clarify why the YOE is 2024 and the NY is 2032 (vs. NY 2027).</p>	<p>EPMPO December 13, 2024 response. Application states that vehicles will replace existing fleet vehicles that are no longer running as well as address their expanding paratransit service needs</p> <p>EPMPO Follow-up response March 7, 2025. <u>YOE was 2024.</u> Not coded in travel demand model. Has been changed to N/A. Project Amistad's fleet includes 39 paratransit vehicles. This project will replace two of them.</p>
99	1		T010-23S	<p>December 5, 2024 comment. Suggest supplying the magnitude of 'purchase of ADA compliant vehicles' e.g., replacement and/or minor expansion.</p> <p>February 13, 2025 Follow-up comment. Suggest confirming if more than minor expansion of the fleet.</p> <p>Also, please clarify why the YOE is 2024 and the NY is 2032 (vs NY 2027).</p>	<p>EPMPO December 13, 2024 response. Application states that the project will increase their ADA paratransit services</p> <p>EPMPO Follow-up response March 7, 2025. <u>YOE was 2024.</u> Not coded in travel demand model. Will change to N/A in project lists. Socorro's existing fleet is 3 Dodge vans, which provide on-demand paratransit service. The drivers for these vehicles are their parks and recreation staff, who fold in on-demand paratransit service to their low income elderly patrons with their other duties. Project is to purchase one ADA-accessible vehicle and fund one dedicated transit employee.</p>
107	2		T3I	<p>December 5, 2024 comment. Suggest supplying the magnitude of 'buses and bus facilities' e.g., replacement and/or minor expansion.</p> <p>February 13, 2025 Follow-up comment. Suggest providing consistency between the Plan Project Listing, TIP and Sun Metro intent e.g., the MTP Project Listing leads one to believe buses could be purchased yet Sun Metro's December 13, 2024 response reflects it will not be used to purchase buses.</p> <p>BACKGROUND. MTP Project Name. FTA 5339 Formula Funding for Buses and Bus Facilities MTP Project Description. For the <u>purchase of buses</u> and facility enhancements including equipment such as ADP hardware/software and security related needs. Also, ticket vending machines and sales related software. Capitalized maintenance incl. rebuilds and bus shelters and amenities. From: Citywide</p>	<p>EPMPO December 13, 2024 response. Sun Metro's response: The description was provided to allow Sun Metro flexibility in optional selection of capital projects but Sun Metro is not purchasing buses with this funding.</p> <p>This project has been used for: Shelters- to be installed in new locations or used to replace existing ones when damaged. Rehab/renovate facilities- Small projects, safety upgrades, and general repairs as needed.</p> <p>EPMPO Follow-up response March 7, 2025. Project not coded in model.</p> <p>Proposed Name: FTA 5339 Formula Funding for Bus Facilities Proposed Project Description: Bus facility enhancements including equipment such as ADP hardware/software and security related needs. Also ticket vending machines and sales related software. Capitalized maintenance incl. rebuilds and bus shelters and amenities Programmed year: T3I-10 is 2023, T3I-11 is 2024, T3I-12 is 2025, T3I-13 is 2026. Propose to amend future years only. (Note: sponsor states that there is no intention to use this money to purchase buses in 2025 or 2026, though it may be used to replace existing support vehicles like sedans for Sun Metro staff or the supervisor vans that go out to bus stops or broken down buses)</p>
108	3		T3J	<p>December 5, 2024 comment. Suggest supplying the magnitude of 'bus purchase' e.g., replacement and/or minor expansion.</p> <p>February 13, 2025 Follow-up comment. Suggest clarifying in the MTP Project Listing that the project is for replacement.</p>	<p>EPMPO December 13, 2024 response. Sun Metro's response: Replacement buses</p> <p>EPMPO Follow-up response March 7, 2025. Proposed Name: FTA 5339 Formula Funding for Replacement Bus Purchase Propose to amend future years only.</p> <p>YOE is 2024, 2024, 2025, and 2026.</p>

#	page	section	additional identifier	PPD Comments December 5, 2024 and February 13, 2025	EPMPO Responses December 13, 2024 and March 7, 2025
	1-3	General	Multi	<p>December 5, 2025 comment. Consistent with 40 CFR 93.126, .127 and .128, suggest use of N/A for NY (vs NY 2032), as appropriate.</p> <p>Examples (vs. an exhaustive list) include: Intersection Lighting CN E100380/MPO ID S601X A/B Alignment Study CN E100430/MPO ID P624X Planning CN E100452/MPO ID T614C Security Equipment CN E100453/MPO ID T614D Sidewalk Improvements CN E100460/MPO ID E608X Preventative Maintenance CN E100470/MPO ID T615A Pavement Resurfacing CN E100471/MPO ID T615B JARC CN E100472/MPO ID T615C Operating Assistance CN E100473/MPO ID T615D Maintenance Facility Equipment CN E100474/MPO ID T615E Security Fencing CN E100475/MPO ID T615F Solar Bus Chargers CN E100480/MPO ID T616A Multiuse Trail CN E100490/MPO ID E609A Multiuse Trail CN E100500/MPO ID E610A</p> <p>February 13, 2025 Follow-up comment. Please advise why several of the series are missing from the MTP Project Listing e.g., MPO ID T615, MPO ID T616, and E609.</p>	<p>EPMPO December 13, 2024 response. Will update MTP Project List Network Year to "N/A"</p> <p>EPMPO Follow-up response March 7, 2025. S601 X, P624X, T614C, T614D, E608X are in both ORIGINAL and CURRENT MTP Project List; Projects T615 A - F, T616A, E609A and E610A aren't in ORIGINAL MTP Project List (Redline, Clean), but do appear in CURRENT MTP Project List (Redline, Clean). Projects were programmed in September of 2024. See column E for project names. All projects were either transit maintenance and operations-type projects (i.e., no new routes and no fleet expansions) or pedestrian trails.</p>
109	1	CN E100321	MPO ID M642X-PE2 P621X-CAP	<p>December 5, 2024 comment. Suggest confirming appropriate Network Year (NY) e.g., NY 2027 v NY 2032.</p> <p>February 13, 2025 Follow-up comment. With an assumed construction cycle of two years, please clarify why the YOY is 2025 and the NY is 2032 (vs. NY 2027).</p>	<p>EPMPO December 13, 2024 response. Project P621X-CAP in NY 2032</p> <p>EPMPO Follow-up response March 7, 2025. Network year determined by guidance from sponsor on milestone dates</p>
110	2	CN E100400	MPO ID T611X	<p>December 5, 2024 comment. Suggest confirming what is included within 'Bus and Bus Facilities'.</p> <p>Depending on the response, suggest NY or N/A e.g., replacement and/or minor expansion.</p> <p>February 13, 2025 Follow-up comment. Please clarify why the YOY is 2023 and the NY is 2032 (vs. NY 2027).</p> <p>Noted EPMPO December 13, 2024 response provides NY N/A.</p>	<p>EPMPO December 13, 2024 response. SCRTD's response: Grant included two electric Gillig buses to be used in Sunland Park. Buses will be replacements for existing service Network Year N/A</p> <p>EPMPO Follow-up response March 7, 2025. Has been revised to N/A in MTP project list PDF</p>
111	2	CN E100420	MPO ID T612X	<p>December 5, 2024 comment. Suggest confirming what is included within 'Electric Buses Acquisition'.</p> <p>Depending on the response, suggest NY or N/A e.g., replacement and/or minor expansion.</p> <p>February 13, 2025 Follow-up comment. Please clarify why the YOY is 2023 and the NY is 2032 (vs. NY 2027).</p> <p>Noted EPMPO December 13, 2024 response provides NY N/A.</p>	<p>EPMPO December 13, 2024 response. SCRTD's response: Electric Gillig buses will be doubled up to replace existing gasoline/diesel buses (AM/PM operation) in order to ensure electric range is sufficient and to lower the annual mileage per vehicle. They may be used to increase frequency as well, depending on business needs. Network Year N/A</p> <p>EPMPO Follow-up response March 7, 2025. Has been revised to N/A in MTP project list PDF</p>
112	2	CN E100421	MPO ID T612B	<p>December 5, 2024 comment. Suggest confirming what is included within 'Electric Buses Acquisition'.</p> <p>Depending on the response, suggest NY or N/A e.g., replacement and/or minor expansion.</p> <p>February 13, 2025 Follow-up comment. Please clarify why the YOY is 2024 and the NY is 2032 (vs. NY 2027).</p> <p>Noted EPMPO December 13, 2024 response provides NY N/A.</p>	<p>EPMPO December 13, 2024 response. SCRTD's response: Electric Gillig buses will be doubled up to replace existing gasoline/diesel buses (AM/PM operation) in order to ensure electric range is sufficient and to lower the annual mileage per vehicle. They may be used to increase frequency as well, depending on business needs. Network Year N/A</p> <p>EPMPO Follow-up response March 7, 2025. Has been revised to N/A in MTP project list PDF</p>
113	2	CN E100422	MPO ID T612C	<p>December 5, 2024 comment. Suggest confirming what is included within 'Electric Buses Acquisition'.</p> <p>Depending on the response, suggest NY or N/A e.g., replacement and/or minor expansion.</p> <p>February 13, 2025 Follow-up comment. Please clarify why the YOY is 2025 and the NY is 2032 (vs. NY 2027).</p> <p>Noted EPMPO December 13, 2024 response provides NY N/A.</p>	<p>EPMPO December 13, 2024 response. SCRTD's response: Electric Gillig buses will be doubled up to replace existing gasoline/diesel buses (AM/PM operation) in order to ensure electric range is sufficient and to lower the annual mileage per vehicle. They may be used to increase frequency as well, depending on business needs. Network Year N/A</p> <p>EPMPO Follow-up response March 7, 2025. Has been revised to N/A in MTP project list PDF</p>
114	2	CN E100440	MPO ID T613A	<p>December 5, 2024 comment. Suggest confirming what is included within 'Fleet Vehicle Purchase'.</p> <p>Depending on the response, suggest NY or N/A e.g., replacement and/or minor expansion.</p> <p>February 13, 2025 Follow-up comment. Please clarify why the YOY is 2024 and the NY is 2032 (vs. NY 2027).</p> <p>Noted EPMPO December 13, 2024 response provides NY N/A.</p>	<p>EPMPO December 13, 2024 response. SCRTD's response: Expansion of bus fleet with new electric buses Network Year N/A</p> <p>EPMPO Follow-up response March 7, 2025. Has been revised to N/A in MTP project list PDF</p>

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116	2	CN E100450	MPO ID T614A	<p>December 5, 2024 comment. Suggest confirming what is included within 'Bus Purchase'.</p> <p>Depending on the response, suggest NY or N/A e.g., replacement and/or minor expansion.</p> <p>February 13, 2025 Follow-up comment. Please clarify why the YOE is 2024 and the NY is 2032 (vs. NY 2027).</p> <p>Noted EPMPO December 13, 2024 response provides NY N/A.</p>	<p>EPMPO December 13, 2024 response. SCRTD's response: Expansion of bus fleet with new electric buses Network Year N/A</p> <p>EPMPO Follow-up response March 7, 2025. Has been revised to N/A in MTP project list PDF</p>
117	2	CN E100451	MPO ID T614B	<p>December 5, 2024 comment. Suggest confirming what is included within 'Capital Maintenance'.</p> <p>Depending on the response, suggest NY or N/A.</p> <p>February 13, 2025 Follow-up comment. Please clarify why the YOE is 2024 and the NY is 2032 (vs. NY 2027).</p> <p>Noted EPMPO December 13, 2024 response provides NY N/A.</p>	<p>EPMPO December 13, 2024 response. SCRTD's response: This is solely for maintenance of capital. No new vehicles. Network Year N/A</p> <p>EPMPO Follow-up response March 7, 2025. Has been revised to N/A in MTP project list PDF</p>
NEW ORG MTP Project List Redline					
#	page	section	additional identifier	PPD Comments February 13, 2025	EPMPO Responses 3/7/2025
118	5	0924-06-665	MPO ID R401XPE Buffalo Soldier Street Improvements	February 13, 2025 comment. Please clarify parkway improvements.	EPMPO Follow-up response March 7, 2025. Per the project sponsor, improvements include sidewalks, landscaping, irrigation system, illumination, and driveways (where necessary).
119	5	0925-06-666	MPO ID R501X Carolina Street Improvements	February 13, 2025 comment. Please clarify parkway improvements.	EPMPO Follow-up response March 7, 2025. Per the project sponsor, improvements include sidewalks, landscaping, irrigation system, illumination, and driveways (where necessary).
120	6		MPO ID R402X Saul Kleinfeld Street Improvements	February 13, 2025 comment. Please clarify parkway improvements.	EPMPO Follow-up response March 7, 2025. Per the project sponsor, improvements include sidewalks, landscaping, irrigation system, illumination, and driveways (where necessary).
121	6		MPO ID R402X Edgmere Street Improvements	<p>February 13, 2025 comment. Please clarify parkway improvements.</p> <p>Noted duplicated MPO ID.</p>	EPMPO Follow-up response March 7, 2025. Per the project sponsor, improvements include sidewalks, landscaping, irrigation system, illumination, and driveways (where necessary).
122	7		MPO ID: R403X Trowbridge Dr I-10 to Marlow Street Improvements	February 13, 2025 comment. Please clarify parkway improvements	EPMPO Follow-up response March 7, 2025. Per the project sponsor, improvements include sidewalks, landscaping, irrigation system, illumination, and driveways (where necessary).
123	7		MPO ID M308X	February 13, 2025 comment. Please clarify Deck Plaza improvements and transportation elements.	EPMPO Follow-up response March 7, 2025. Project is for a planning study only. Eventual project could include design and construction of the freeway cap, sidewalks, bicycle facilities, landscaping, greenspace, and recreational amenities
124	7		MPO ID M408X	<p>February 13, 2025 comment. Please clarify design of two complete streets.</p> <p>Note that Dilley is not Federal Aid eligible.</p>	EPMPO Follow-up response March 7, 2025. NOTE: Preliminary engineering project was let 2024 consistent with its TIP/STIP entries Per the applicant: "Horizon City's design phase of the proposed Transit Oriented Development (TOD) includes the design of two complete streets, Dilley Road and Delake Street and the design of the TOD Transit Plaza, to include amenities and utilities." It should be noted that this is a 2024 Community Project Funding (CPF) program-funded project, and the administering agency is HUD, which allows improvements to local streets (https://files.hudexchange.info/resources/documents/Basically-CDBG-Chapter-6-Public-Facilities.pdf , see p. 2)

EMISSIONS TABLES

Table 1. Comparison of emissions resulting from changes to TDM coding, using the EPMPPO's emission sketch tool.

		2032			2040			2050		
	POLLUTANT	ORIGINAL	UPDATE	DIFFERENCE	ORIGINAL	UPDATE	DIFFERENCE	ORIGINAL	UPDATE	DIFFERENCE
SUMMER	VOC	3.27	3.27	0.000%	2.69	2.69	0.000%	2.59	2.59	0.000%
	NOX	6.75	6.75	0.000%	6.27	6.27	0.000%	6.56	6.56	0.000%
	PM10	6.04	6.04	0.000%	6.46	6.46	0.000%	7.05	7.05	0.000%
	VMT	20,970,209	20,968,365	-0.009%	22,382,800	22,382,289	-0.002%	24,413,759	24,412,900	-0.004%
WINTER	PM10	6.73	6.73	0.000%	7.18	7.18	0.000%	7.87	7.86	-0.127%
	VMT	22,472,764	22,470,788	-0.009%	23,986,569	23,986,022	-0.002%	26,163,050	26,162,130	-0.004%

Table 2. Comparison of emissions from official TTI runs and the EPMPPO's emission sketch tool.

		2032			2040			2050		
	POLLUTANT	TCR	TOOL	DIFFERENCE	TCR	TOOL	DIFFERENCE	TCR	TOOL	DIFFERENCE
SUMMER	VOC	3.27	3.27	0.00%	2.69	2.69	0.00%	2.59	2.59	0.00%
	NOX	6.75	6.75	0.00%	6.27	6.27	0.00%	6.56	6.56	0.00%
	PM10	6.03	6.04	0.17%	6.44	6.46	0.31%	7.03	7.05	0.28%
	VMT	21,077,483	20,970,209	-0.51%	22,530,833	22,382,800	-0.66%	24,587,643	24,412,900	-0.71%
WINTER	PM10	6.71	6.73	0.30%	7.16	7.18	0.28%	7.83	7.87	0.51%
	VMT	22,587,764	22,472,764	-0.51%	24,145,125	23,986,569	-0.66%	26,349,303	26,163,050	-0.71%