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## TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

*Protecting Texas by Reducing and Preventing Pollution*

March 28, 2025

Achille Alonzi, Division Administrator  
Federal Highway Administration, Texas Division  
300 E. 8th Street, Rm 826  
Austin, Texas 78701

Via Email

Subject: Transportation Conformity Review and Concurrence

Dear Achille Alonzi:

Thank you for the opportunity to review the *Transportation Conformity* report and supporting documents for the Amended RMS2050 Metropolitan Transportation Plan (MTP) and RMS 2023-2026 Transportation Improvement Program (TIP) developed by the El Paso Metropolitan Planning Organization (EPMPO). The Texas Commission on Environmental Quality (TCEQ) is satisfied that all requirements are met, and transportation conformity is demonstrated. The purpose of this conformity analysis was to determine if EPMPO's 2050 MTP and the 2023-2026 TIP are consistent with transportation conformity emissions requirements for the El Paso carbon monoxide (CO) National Ambient Air Quality Standard (NAAQS) maintenance area and the El Paso coarse particulate matter (PM<sub>10</sub>) NAAQS nonattainment area. The El Paso CO NAAQS maintenance area is subject to a limited maintenance plan, so no regional emissions analysis is required for conformity. EPMPO demonstrated that projected on-road mobile PM<sub>10</sub> emissions for the 2022, 2032, 2040, and 2050 analysis years were lower than the PM<sub>10</sub> motor vehicle emissions budget (MVEB) of 12.05 tons per day. EPMPO's conformity analysis also covered the El Paso-Las Cruces, Texas-New Mexico 2015 eight-hour ozone NAAQS nonattainment area. Though the June 2023 D.C. Circuit decision reversed EPA's nonattainment designation of El Paso County for the 2015 ozone standard, consultation partners agreed to include the El Paso County portion of the ozone nonattainment area in the conformity analysis in case EPA re-issued a nonattainment designation for El Paso County.

If you have questions about our review, please contact Sarah Thomas of my staff at 512-239-4939 or [sarah.thomas@tceq.texas.gov](mailto:sarah.thomas@tceq.texas.gov).

Sincerely,

Donna F. Huff, Deputy Director  
Air Quality Division

cc: Jose Campos, Federal Highway Administration  
Guy Donaldson, U.S. Environmental Protection Agency  
Doug Booher, Texas Department of Transportation  
Humberto Gonzalez, Jr., P.E., TPP Division, Texas Department of Transportation  
Eduardo Calvo, El Paso Metropolitan Planning Organization