

APPENDIX: PUBLIC INVOLVEMENT



The comments, opinions, and statements received from members of the public as part of the public comment period reflect solely the viewpoints of the person or entity providing the public comment and in no way represent the El Paso MPO's viewpoint on any particular issue unless expressly stated otherwise. Furthermore, to the extent that the El Paso MPO responds to public comments, the responses are meant to be general and broad. El Paso MPO responses are not intended to be exhaustive, binding, or legal statements on behalf of the El Paso MPO or the Transportation Policy Board.

PUBLIC COMMENTS AND RESPONSES RECEIVED DURING PUBLIC COMMENT PERIOD (JANUARY 24 - MARCH 9, 2022) FOR THE REGIONAL MOBILITY STRATEGY (RMS) 2050 METROPOLITAN TRANSPORTATION PLAN (MTP), RMS 2023-2026 TRANSPORTATION IMPROVEMENT PLAN (TIP), AND TRANSPORTATION CONFORMITY REPORT (TCR)

Date	Name or Organization	Comment	MPO Response
1/27/2022	Noemi Herrera	I found the transportation conformity report most interesting. The air does look pretty dirty on some days. I also understand that air quality is historically a challenge for our area. I hope the MPO can leverage its partnerships across the region to shine the light on this issue for the public and initiate innovative solutions that everyone (from private households to large corporations) can implement. Noemi Herrera	Due to the unique international interaction and the geographic location (the Chihuahuan Desert) of El Paso Region, the El Paso Metropolitan Planning Organization (MPO) area is significantly impacted and currently in non-attainment status for PM10 and Ozone. During high wind days dust storms are very common in our area reducing visibility drastically. Regarding partnerships, the El Paso MPO is an active voting member in the Joint Advisory Committee (JAC), which includes agencies from different levels of government and from both sides of the border, serving as the local community-based organization overseeing the process to achieve cleaner air for the Paso del Norte Region.

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Date	Name or Organization	Comment	MPO Response
2/10/2022	Lorenzo Luevano	<p>Good evening,</p> <p>My name is Lorenzo Luevano and below you can find my transportation comments for El Paso MPO in regards to my personal experience using Socorro road and adjacent roads on a daily basis.</p> <ul style="list-style-type: none"> • • There is always traffic especially during rush hour and when school starts and ends for the day. • • • A lot of street lights take forever to change colors. (some lights take 5-10 minutes to change) • • • • Traffic is even worse to get into the loop 375 at both ramps Americas and Zaragoza especially because of the 18 wheelers and • the international bridge backup traffic. (sometimes dangerous) • • • People driving fast and passing others like if it is a freeway. • • • • Flooding problems along Socorro rd. • • • One lane coming in and one lane coming out. • • • • no easy access connection to I-10 and loop 375 • • • All the projects are happening around/at Horizon City, Border Highway (Americas), El Paso downtown, West Side, near and around • Fort Bliss and UTEP. (nothing beyond Loop 375 at Socorro rd and Alameda) • • • • I have heard about the Border Highway project that would connect around the Zaragoza International Bridge to Tornillo for over • 10+ years but nothing has been done knowing it is much needed here rather than other projects that have been completed during the same time frame. • • • I live in San Eli and far too many times I have seen and heard that we are left out from studies/projects/improvements. • • • • I feel San Eli is just used to push Historic Tourism but at the end of the day no infrastructure has been added to support that • idea. • 	<p>Good Evening Mr. Luevano,</p> <p>Thank you for your comments. El Paso MPO staff will provide your comments to the Transportation Policy Board (TPB) for their consideration. The RMS 2050 MTP project list was developed in coordination with all regional entities that submitted projects for consideration, including El Paso County. El Paso MPO and the TPB must consider a variety of factors when prioritizing projects and the various areas of our region, including project readiness, cost, as well as benefit to the greater transportation network. The MPO is committed to ensuring that improvements to the transportation network be fair to all areas and populations.</p>

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Date	Name or Organization	Comment	MPO Response
2/14/2022	Familias Unidas del Chamizal	<p>Dear El Paso Metropolitan Planning Organization:</p> <p>On behalf of Familias Unidas del Chamizal, I write to respectfully request that you grant a 30-day extension to the public comment period for the three draft regional planning documents: Regional Mobility Strategy (RMS) 2050 Metropolitan Transportation Plan (MTP), RMS 2023-2026 Transportation Improvement Plan (TIP), and Transportation Conformity Report (TCR).</p> <p>As you know, these planning documents will set transportation priorities for decades, and are a necessary step in the approval of important projects that are contemplated in the near term. Numerous members of our community, including some non-English speaking individuals, are interested in commenting on the documents. We do not believe 30 days is sufficient time for members of the community to digest the thousands of pages of technical analysis and to provide meaningful comments in response, particularly given the language barrier that many of our residents face.</p> <p>Thank you for your consideration of this request.</p>	<p>Good Afternoon Mr. Baake,</p> <p>Thank you for your comment. El Paso MPO has extended the public comment period for two weeks, concluding on Wednesday, March 9th. We have updated the MPO website and social media accounts to reflect the extension, and also emailed an announcement to entities represented on our policy board as well as our general mailing list. Please feel free to notify any and all other interested parties that you are aware of. Additionally, our fourth public meeting is scheduled for 6-8 pm tonight, and will be conducted virtually via Microsoft Teams – you can find information on how to participate here: https://www.elpasompo.org/RMS2050MTP.</p> <p>Thank you again for your interest and participation in the public comment period for these documents. Please let me know if you have any additional comments or questions.</p>
2/16/2022	Franklin L. Stubbs LeBaron	<p>Good morning,</p> <p>1. In yesterday's presentation you all made reference to a project list, can you please direct me as to where this might be? 2. You all mentioned that we have a status of "nonattainment," curious as to what the MPO is doing (steps and practices) to reach attainment status? 3. El Paso MPO is a public organization? How are you funded? Is there a board? I ask because I am just wondering/curious...</p>	<p>Good Morning Mr. LeBaron,</p> <p>Thank you for attending our public meeting yesterday and for the follow up questions.</p> <p>1. Both the MTP and the TIP include project lists. The MTP includes a listing of all planned projects for years 2023-2050. The list is summarized in Chapter 7 (link to PDF), and a more detailed version is included as Appendix C (link to PDF). The TIP is the associated short-range planning document, and only includes projects planned for years 2023-2026. That project list begins on page 23 of the TIP (link to PDF).</p> <p>2. When a region is in non-attainment for one or more emissions standard, the MPO and local governmental entities are obligated to consider emissions in project planning, and to ensure that planned projects are helping the region get closer to "attainment" (that is to say, closer to meeting the emissions standards). The MPO demonstrates this through modeling the changes to traffic patterns and overall vehicle miles traveled upon completion of planned projects. The Transportation Conformity Report explains the results of this modeling https://www.elpasompo.org/TransportationConformityReport</p> <p>3. El Paso MPO is certified by the Federal Highway Administration, the Federal Transit Administration, and the Governors of Texas and New Mexico as the entity responsible for coordinating region-wide transportation planning activities with local governments, the state Departments of Transportation, and local and state elected officials. We are funded through a combination of federal and state sources, including federal transportation funding bills approved by U.S. Congress, and targeted funding approved by the Texas legislature. Chapter 6 of the MTP includes a summary of the various sources of MPO funding: https://www.elpasompo.org/media/MTP/RMS2050MTP/RMS%202050%20MTP%20DR-AFT-FINAL-Chapter%206.pdf</p> <p>All MPO decision-making is ultimately approved by the Transportation Policy Board, which is a 30-member board consisting primarily of local and state-level elected officials from across the El Paso region. The board meets monthly: https://www.elpasompo.org/TransportationPolicyBoard</p> <p>If you have additional questions or comments, please let me know.</p>

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2/21/2022	Chris Lyons	<p>It is obvious from a cursory view of the attached Chapter 3 that the information related to NM is grossly inaccurate. As an example, the truck volumes that the document forecasts for NM136 by 2050 in Figure 3-17, are the same truck volumes that we are generating today, in 2022. So NM's truck volumes through the POE, and/or generated by UP's expansion and new industrial development, aren't forecasted to grow at all in the next 28 years? Unless I'm misreading Figure 3-18, it shows projected 2050 employment in Santa Teresa of between 248 and 833 workers. We have multiples of this employment number today, in 2022.</p> <p>It would be helpful to know who in NM is responsible for generating and submitting the inputs? Can an action plan be undertaken to be able to submit updated information to the MPO by the March 9th deadline? Who would be responsible?</p> <p>Let us know your thoughts.</p>	<p>Thank you for your comments. We did find an error in the reported truck flow formula (the overall vehicle flow is correct, but the % trucks was reported incorrectly). We will correct the formula and flow map in the final version of the MTP document, and also replace the map to identify TAZs with basic employment and isolate those TAZs with no basic employment. Basic employment growth in the Santa Teresa area is about 1% per year (compounded rate). As the map shows, each direction of Pete Domenici (Hwy 136) will be in the range of 1000-2000 trucks/day (2000-4000 trucks/day both ways).</p>

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Date	Name or Organization	Comment	MPO Response
2/22/2022	El Paso County Commissioners Court	<p>Dear Chairman Miller,</p> <p>At the special session of the El Paso County Commissioners Court held on February 17, 2022, the Court voted 4-1 to submit the following public comment to the El Paso Metropolitan Planning Organization's Call for Public Comment regarding the development and upcoming adoption of the Regional Mobility Strategy (RMS) 2050 Metropolitan Transportation Plan (MTP), RMS 2023-2026 Transportation Improvement Plan (TIP), and Transportation Conformity Report (TCR). Specifically, the County offers the following items for the MPO's review and consideration:</p> <ol style="list-style-type: none"> The County hired a third-party and independent consultant, Smart Mobility, Inc., to evaluate the Downtown I-10 Segment 2 Project data set and related traffic projections. The findings of that report are incorporated into this letter and comment as Attachment A. It is important to note that this report is submitted as a matter of record from the County to the MPO as both agencies continue to review the findings identified within the report. It is the County's intent to foster a thoughtful dialogue with the MPO and the Texas Department of Transportation – El Paso District regarding the data contained within the report to further refine these critical transportation planning activities. As discussion continues between the County and MPO, the Court requests that the comment period for these planning documents be extended beyond the existing 30-day period. The MPO's Public Participation Plan, Section 4, only provided a minimum public comment period but not a maximum. The data presented in Attachment A should be shared with not only planning agencies but the community at large to foster further dialogue and understanding of these strategic documents, which may in turn, lead to additional public comment. Given the analysis completed by the County's consultant, and the request to engage in a dialogue regarding data and findings within the report, the County requests that the MPO share the Draft 2050 Travel Demand Model with the County and its consultant. Use of the model will be limited to the expansion of the existing analysis currently underway by the Consultant. The County understands that, at this time, the model is not considered final and should not be used for any other purpose. Revise the 2050 Metropolitan Transportation Plan and place the Border Highway East – Phase I Project (CSJ 0924-06-591 and MPO ID No. F059X-CAP-1) somewhere within the 2032 Network Year (it currently is in FFY 2040). Further, revise the MTP and place the Border Highway East Phase II Project (CSJ 0924-06-592 and MPO ID No. F059X-CAP-2) within the 2040 Network Year (it is currently in FFY 2050). <p>Finally, the County may revise, modify or withdraw any of these comments given that the MPO has extended the comment period to March 9, 2022. Thank you for your critical work on this issue and we look forward to continuing the dialogue to make the MPO's Regional projects successful in meeting the present and future needs of the El Paso region collectively.</p> <p><i>(Report attached at bottom of matrix (see Attachment #1))</i></p>	<p>1. El Paso MPO staff looks forward to receiving and reviewing the final report from the consultant contracted by El Paso County. MPO staff has reviewed the preliminary report submitted as public comment, and offers the following comments as response:</p> <ul style="list-style-type: none"> The validation of the MPO's TDM is only for traffic volumes, not for speeds; this is the accepted state of practice for regional travel demand models. As the report states, "the model speeds are in the right general ballpark" to allow for proper characterization and convergence of the TDM's feedback loop. Identification of projects, as described in Chapter 3 of the MTP, used the TDM's volume/capacity (V/C) ratios under the RMS 2019 analysis, as well as the CMP's Travel Time Index, not the one from the TDM; the CMP's Travel Time Index used TTI's COMPAT tool, which makes use of observed speeds from LBS sources. Therefore the statement in the report from the County's consultant (last paragraph p.7) is misleading. The Travel Time Index and PM Peak Hour Delay per Capita figures in Table 5-11 of the MTP are part of the systems-level analysis (Chapter 5) as a means to compare region wide performance measures of no-build and full-build scenarios; these figures were not used to identify and select projects. The MPO did develop a DTA base network for the entire region as a pilot, but its need for details of signalized corridors makes it an impractical tool for regional modeling and a significant challenge for future scenarios. For similar reasons the MPO does not attempt microsimulation of its regional network, although the currently available technology provides the computer power. More than computer power, it is the amount of data required to feed a regional DTA and the challenge of its calibration. As stated in the FHWA PUBLICATION NO. FHWA-HRT-21-082 (Sept. 2021), isolated models at different levels of resolution have their advantages and disadvantages, and none can completely replace another. Project sponsors are encouraged to use such tools as DTA and/or microsimulators as complement to the TDM for further analysis of specific corridors (considerably smaller sub-areas of the region) and/or projects. <p>2. El Paso MPO has now extended the public comment period from 30 days to 45 days, and announced this extension on the MPO website and social media accounts, as well as through email notifications to regional entities and the general MPO mailing list.</p> <p>3. All documentation describing the methodology employed to develop the RMS 2050 TDM has been made available for public review – see Appendix J of the RMS 2050 Transportation Conformity Report (TCR) here: https://www.elpasompo.org/TransportationConformityReport. This documentation indicates that there are not significant fundamental differences between the 2045 and 2050 models. Additionally, the 2050 RMS TDM Master Network is also available as Appendix H of the TCR.</p> <p>4. The RMS 2050 MTP project list was developed in coordination with all regional entities that submitted projects for consideration, including El Paso County. The Transportation Policy Board reviewed and approved the draft project list at their meeting on September 17, 2021. While the project list in the MTP draft was developed based on an established prioritization criteria, amendments to particular projects can be considered after the initial adoption of the MTP. As the project amendments requested would also require amendments to the validated network years, MPO staff recommends that these changes be considered after the initial adoption of the documents. El Paso MPO is committed to evaluating additional funding options that will make the Border Highway East project more feasible for short-term programming.</p>

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2/23/2022	Luis Dominguez	<p>BHE needs to be prioritized for funding. BHE will serve areas to the east of the County with the highest poverty rate, lowest educational attainment, and access to healthcare services. BHE is a lifeline for revitalizing the local economies of Fabens, San Elizario, Socorro, etc. Allow students to access EPCC and UTEP via direct route, create alternate roadway so that the Mission Trail on Socorro Rd. can be developed into a true historic site that the entire region can benefit from. Connectivity gap analysis does not adequately capture gaps outside of City of El Paso. Multimodal gaps identified as priority are mostly in El Paso. Peak demand corridors show areas where investments are prioritized, but does not take into account areas that have low demand because they have never even been served at all, such as San Elizario and Socorro. Most improvements and prioritizations are in El Paso. The areas with the highest projected population growth are all OUTSIDE the City of El Paso, yet very few multimodal projects, transit projects, sidewalk, trails, road projects are prioritized there.</p>	<p>Thank you for your comment. The El Paso MPO staff recognizes the absence of available data has made it difficult to incorporate the areas Socorro/San Elizario area in the multimodal gap analysis. We are currently working to improve data gathering and analysis of this area to ensure that future studies can best consider the needs of the entire study area. Your concerns and recommendations will be provided to the Transportation Policy Board for their consideration on funding prioritization.</p>
3/7/2022	John Eyberg	<p>Hi, all—I hope you are doing well and not suffering much from this cursed coronavirus! Regarding future roadworks, I am strongly opposed to putting a deck over I-10 in downtown El Paso, and expanding I-10 lanes in that area.</p> <p>Much of the motor traffic passing there is not stopping/getting off I-10 and moves into destinations further West or East, especially the big rigs (18-wheelers, which have been restricted from the far left lane).</p> <p>The solution to reducing this congestion is to provide an alternate route/bypassing downtown/Westside/Eastside-Northeast.</p> <p>The immense funds which are being considered to pay for the deck should be re-allocated to new construction of a multi-modal “outer-outer-loop” which can serve ALL roadusers (ped/skater/jogger/wheelchair/bicycles/non-motorized & motorized vehicles. An example of this kind of World-class roadway is Spur 601, which connects US54 and Purple Heart.</p> <p>I strongly encourage that the “outer-outer-loop” connect Texas I-10 exit 55 and NM I-10 exit 162. This route would obviously include much upgrading/improvement of existing roadway as well as all new construction. All of it will be similar to Purple Heart between Montana/US62-180 and Railroad Drive: 4-lanes divided with large shoulders/break-down lane and periodic over/under passes/ramps as appropriate.</p> <p>Going East from exit 162, The first interchange is DACC-Gadsden Center; frontage roads will access the collection station and shooting range. The next interchange is the Sierra Vista Trailhead/Franklin Mountains State Park/Bowen Ranch; frontage roads will access the gas lines/shooting range. The next interchange is with NM213/Chaparral likely a “spaghetti bowl” configuration. Continuing East, new roadway paralleling Lisa-Angelina roads to a major “spaghetti bowl” intersection with US54.</p> <p>Completely new road is constructed East from there, adjacent to range 22, then curving South across the Texas state line to between Butterfield & Hueco Tanks roads, with another major “spaghetti bowl” interchange at Far East Montana/US62-180. From there, the Southeast route continues along Connelly Road to 1281/Horizon Blvd/Far East Horizon City. From that interchange going SE, the route follows Sandy Road , crossing El Paso Jal Pipeline/San Felipe roads. Then, completely new road is constructed, connecting to Burner Cattle County/Tornillo roads, finally to the improved/upgraded Texas I-10 exit 55.</p> <p>The entirety of this long distance will cost big bucks, but it can be built in sections over time, beginning from both extremes: NM I-10 to Chaparral to US54; TX I-10 to Far East Horizon to Montana/US62-180. The last segment, between US62-180 and US54, will be a tremendous multimodal connector across two states that will enable most of the multi-axle trucks/trailers to avoid congesting downtown I-10/El Paso and continue rapid transiting East or West across the Southern tier of the USA.</p> <p>This is an excellent solution to no deck/I-10 widening downtown and will reallocate that money to thus long-term project. It will certainly benefit every roaduser who has no need to “go downtown”. It will definitely increase the already-great attraction to our “Hidden Gem of the World, Crossroads of North America, anchored by El Paso, Cd. Juárez y Las Cruces!”</p>	<p>Thank you for your comment. As part of the process, the MPO and TXDOT will review the route that you are proposing. A portion of your proposal is similar to the Borderland Expressway (formerly known as Northeast Parkway) proposed by TxDOT. This project is currently going through the project development process and public review. Borderland Expressway is also one of the proposed projects to be included in the RMS 2050 MTP. If you would like to take a look at this project's web site you can go to: https://www.txdot.gov/inside-txdot/projects/studies/el-paso/northeastpkwy-lp375-fm3325.html. The EPMPPO follows a project selection process where sponsoring agencies submit the proposed projects for inclusion in the MTP. The details for the alignment and project phasing are coordinated with these entities and is not determined by the MPO. We will provide your comment to the Transportation Policy Board and corresponding agencies for their consideration and funding prioritization.</p>

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3/7/2022	David Cantu	<p>Dear Board Members,</p> <p>I am writing regarding the new transportation plan and the process of project selection. As a resident of San Elizario in El Paso County I feel that the Mission Valley Historical District has been neglected over the years when it comes to transportation issues and plans. A transportation plan needs to include all elements of transportation with a Metropolitan area, not just the City of El Paso.</p> <p>I have lived in San Elizario for more the 50 years, and for the last 40 years there has been talk about a Boarder Highway that would connect the communities of Tornillo, Fabens, San Elizario, Socorro and Ysleta to El Paso. What was later to be called the Border Highway East, in 2013 a Study was conducted which included community feedback and completed in 2014. A resolution passed by the MPO in 2015, to include the BHE in the planning process, however it has been pushed back or delayed to many times resulting in unnecessary projects and widening I-10. How convenient that the BHW to the west side was completed first, when there no genuine issues leaving El Paso from downtown.</p> <p>However, this was not the first study conducted. A feasibility study was conducted and published in 1997 for portions of the BHE that identified the following challenges: Increasing traffic demands on east-west mobility, Lack of connectivity to I-10, Congestion and the need for an alternative/parallel route to existing roadways, Social and economic demands from population growth, increasing strain on local roadways and railroads associated with international trade, Interregional trade and freight rail movements.</p> <p>Here we are 22 years later, and nothing has been done. Today the same challenges exist plus a few more with the resent growth in population and small businesses. For us who live in San Elizario now face even more congestion along east-west arterials on Socorro Rd. There is also a high volumes of truck traffic along the existing east-west arterials mainly in the Ysleta area on Socorro Rd and Americas. Thus, getting into El Paso from San Elizario and the Mission Trail have become a challenge and headache.</p> <p>I too as many other commuters am asking that you think things through as you move forward in the future. Many of you have already heard from others about the issues in transportation and the research conducted on the not so effective widening of roads. Congestions will always be an issue if Planning Bodies do not do things smartly. There must be more efficient solutions to divert traffic from the downtown area then proposed wider roads and deck projects, which will displace residents, communities, and businesses downtown. For us in the County area there must be better alternatives to help elevate travel time into and around El Paso.</p> <p>Downtown El paso need to be a walkable Downtown and Traffic should be diverted to Loop 375. Projects selections need to be done smartly to allow for alternative transportation such as multimode transportation, walkable and Bicycle friendly communities. These are the areas of the transportation plan that need to be revisited and made a priority, not spend millions of dollars for studies of a downtown deck and winding I-10. There is so much more work to be done and this plan needs to be revisited and written to solve the real issues of this unique diverse community of El Paso County.</p>	<p>Good Evening Mr. Cantu,</p> <p>Thank you for your comments. MPO staff will provide your comments to the Transportation Policy Board for their consideration. The Border Highway East project is included in the RMS 2050 MTP project list, with the first phase scheduled for funding in 2033, and subsequent phases (four in total) scheduled for later years. This scheduling was determined as part of the project prioritization process, which was a collaborative process including the input of all regional entities, including the County of El Paso and Mission Valley municipalities. While the project was not identified as a short-term priority for the region through this process, the transportation planning process is a continuous one, with the opportunity to move up individual projects depending on their readiness and the availability of funding. El Paso MPO is committed to seeking out additional funding opportunities for the Border Highway East project that will make it feasible to accelerate its completion.</p>
3/7/2022	Franklin L. Stubbs LeBaron	<p>Hey Harrison,</p> <p>I hope this email finds you well.</p> <p>I am working on a project for our group and was wondering if you had excel files of project list from 2022-2050—so I don't have to recreate it? This would save me a ton of time...</p>	<p>Hello Franklin,</p> <p>I have attached an excel version of the project list. Please let me know if you have any other questions.</p>

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Date	Name or Organization	Comment	MPO Response
3/8/2022	Bob Storch	<p>The MPO long-range transportation plan is disappointing. It's primarily auto-centric. Downtown 10 remains a priority. Since Downtown 10 is still unfunded by TxDOT, other local projects, some of them needed now, will be sacrificed or delayed for this unnecessary and destructive project.</p> <p>Why is Downtown 10 (2027) prioritized over the Borderland Expressway (2028) and the Border Highway East (2041)?</p> <p>While the public priorities are safety, quality of life and the environment. Project priorities continue to focus on speed and capacity for cars. Pedestrians, bicyclists and transit remain low-priority.</p> <p>The preliminary draft report from the independent engineer hired by El Paso County raises questions about the traffic modeling used by TxDOT to justify widening the highway downtown.</p> <p>Why does the MPO and TxDOT use out dated static traffic modeling on a segment-by-segment basis instead of active traffic modeling for the entire region?</p> <p>The county engineer's analysis of Downtown 10 stated flatly it would not reduce congestion. The proven principle of "induced demand" applies to all urban highways. Increasing main travel lanes through Central El Paso will increase congestion, noise and air pollution.</p> <p>The use of "adaptive lanes" to reduce congestion is unproven.</p> <p>What is the purpose of the "adaptive lanes" added to I-10? Where is the data to justify those lanes?</p> <p>The current transportation network of the El Paso MPO region is economically and environmentally unsustainable. The policy board must lead in making it more sustainable. This proposed long-range plan is not that document. We can, and must, do better.</p>	<p>Good Evening Mr. Storch,</p> <p>Thank you for your comments. MPO staff will provide your comments to the Transportation Policy Board for their consideration. We encourage you and all concerned members of the public to participate in the ongoing project development activities being undertaken by the I-10 project sponsor, the El Paso District Office of the Texas Department of Transportation.</p> <p>Please find responses to your questions below:</p> <p><i>Why is Downtown 10 (2027) prioritized over the Borderland Expressway (2028) and the Border Highway East (2041)?</i> Both Downtown 10 and Borderland Expressway are identified as priority projects in the RMS 2050 MTP. Since both projects are programmed in the 2032 network, the exact funding year can be adjusted as new opportunities for funding arise. Phase 1 of Border Highway East is programmed for funding in 2033 (2041 network year). While it is in a later network year, the TPB could still choose to move the project up to an earlier year for funding as necessary.</p> <p><i>Why does the MPO and TxDOT use out dated static traffic modeling on a segment-by-segment basis instead of active traffic modeling for the entire region?</i> El Paso MPO and TxDOT do use dynamic modeling at the individual project level. For regional network modeling, the "State of the practice" is to employ a static traffic assignment methodology. Dynamic traffic assignment is a useful tool for project-level analysis, however the exceptional quantity of specific network data needed to make a dynamic model accurate is not realistically achievable at the regional level. El Paso MPO staff has researched the state of dynamic traffic assignment technology, and has determined that such a model is not yet suitable for regional transportation network modeling. However, we are aware that other MPOs are also looking into the possibilities that dynamic traffic assignment may hold for the future, and El Paso MPO looks forward to reviewing those findings.</p> <p><i>What is the purpose of the "adaptive lanes" added to I-10? Where is the data to justify those lanes?</i> This question is best directed at TxDOT, as they are the sponsoring entity responsible for project design.</p>
3/8/2022	Oscar Martinez	<p>As a retired El Pasoan on a fixed income and paying high taxes, I am very concerned about proposed freeway projects that will require taxpayers to foot the bill. El Paso already has the second highest property tax rate in the country. Therefore, I object to the widening of the freeway in the downtown area and to the proposed deck park based on the cost. Secondly, don't think El Paso needs either of those two projects. I-10 is fine as it is. Instead of widening the freeway in central El Paso to accommodate all the trucks, it makes more sense (and is more cost effective) to divert that traffic to the Anthony Gap road. Expand and modernize that road and send the trucks that are passing through El Paso in that direction. That would help our traffic flows significantly and would be much safer for local motorists.</p> <p>It's all a matter of common sense and thinking of the community first, not special interests.</p> <p>Thank you for your consideration.</p>	<p>Good Evening Mr. Martinez,</p> <p>Thank you for your comment. El Paso MPO staff will provide your comment to the Transportation Policy Board for their consideration. While detailed funding for the I-10 project has not yet been determined, it is anticipated that the bulk of project funding will be from statewide and federal funding sources rather than local taxpayers specifically. The Anthony Gap roadway project that you suggest is also included in the proposed project list as the "Borderland Expressway", with the first phase of that project planned for funding in 2023. While the Borderland Expressway will serve as a relief route for through traffic, the majority of trips on I-10 in the downtown area are local, and it is expected that most of the increase in traffic through 2050 will also be local in origin. We also encourage you and all concerned members of the public to participate in the ongoing project development activities being undertaken by the I-10 project sponsor, the El Paso District Office of the Texas Department of Transportation, particularly since your questions are directed at TxDOT.</p>

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Date	Name or Organization	Comment	MPO Response
3/8/2022	Wesley A Lawrence	<p>Dear MPO Board,</p> <p>As a citizen born and raised here in El Paso, TX, a dedicated leader in Northeast El Paso, Resident of PCT 4, and the Vice President of the El Paso Young Democrats., I want to share my concerns about the proposed project to widen I-10 and add frontage roads from Copia to Executive. The expansion of I-10 will lead to an increase in noise and air pollution in the downtown area, induced traffic demand that will lead to more accidents, the forced removal of El Pasoans from their homes, and it will only be yet another example of our local governments lack of concern for climate change & Global warming. I want to be clear that we cannot have equitable transportation policies without admitting that Climate Change and resiliency are smart transportation policies.</p> <p>Across the country, city after city has been promised these sorts of projects will solve their traffic issues, and it just does not happen. A famous example is the Katy Freeway, at 26 lanes one of the most congested in the country, among many others, we can observe with our own eyes when traveling our beautiful country. It makes sense to thoroughly scrutinize the data that supposedly justifies this project and seek more comprehensive approaches to our city's transportation needs. We cannot simply expand freeways, expecting that to be the solution.</p> <p>Instead, we must invest in equitable forms of transportation for all members of our community, investment in Green Infrastructure projects such as the installation of more trees in highly polluted areas, ensuring that all traffic projects are met with environmental and feasibility studies, and ensuring that El Pasoans have a voice in these types of projects.</p> <p>Please, show leadership to ensure that we get those answers and that transportation projects:</p> <ul style="list-style-type: none"> •Use tax dollars wisely; •Respect neighborhoods; •Ensure that all transportation projects are met with environmental and feasibility studies; •Introduce true community engagement and environmental equity into the transportation planning process; •Invest in Green Infrastructure that will reduce noise and air pollution; •Provide people with equitable transportation opportunities, invest in projects that ensures walkers and bikers safely, take public transportation, or use a private vehicle to reach their destinations; •Are based on reliable data, not just "the way things have been done in the past." 	<p>Thank you for your comment. El Paso MPO staff will provide it to the Transportation Policy Board (TPB) for their consideration. We also encourage you and all concerned members of the public to participate in the ongoing project development activities being undertaken by the sponsor, TxDOT, of the Downtown10 project.</p>
3/8/2022	Aurolyn Luyck	<p>Dear EPMPO, I would like to express my strong opposition to the proposed expansion of I-10 downtown. Numerous studies have shown that widening freeways reduces congestion only very temporarily, so this seems like a very disruptive and expensive project without any clear benefit. I am also concerned about the increased pollution and the destruction of existing neighborhoods. Wasn't El Paso supposed to be "revitalizing" its downtown instead of destroying it? I drive I-10 regularly (though not daily), and it's obvious that downtown is not even the most congested part. We hear daily of accidents on I-10 around George Dieter and Zaragoza -- why is attention not being given to make THOSE areas safer, instead of pouring money into something that will make the downtown area more polluted as well as more frustrating and dangerous to drive (during the long period of construction). I know that community groups have been monitoring small particle air pollution around the city, showing "hot zones" near the proposed expansion. TXDOT's own Air Quality Handbook states that public concerns about air quality are supposed to trigger a public involvement requirement. Can you explain to us your plan for public involvement, given that the public has clearly expressed its concerns? Like many El Pasoans, I have been living in the middle of a construction site (N. Stanton St.) for the last 6 months. This has affected my quality of life to the point that I am seriously considering leaving El Paso. The prospect of another year or two of construction downtown would be one more push to leave this city that I love. Please explain to El Paso residents how you plan to respond to these concerns.</p>	<p>Thank you for your comment. As you mention in your comment, TxDOT has a public involvement process as part of the project development. MPO staff will provide your comments to TxDOT for their review and consideration.</p>

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Date	Name or Organization	Comment	MPO Response
3/8/2022	Walli Haley	<p>March 9, 2022 meeting comments. I appreciate you taking the time to read this. I am opposed to expanding the freeway in El Paso. Doing this will not only negatively affect the already poor air quality, it won't significantly decrease the traffic already whizzing by. In fact, it was putting the freeway directly adjacent to downtown in the 1960's that contributed to the demise of a once vibrant and beautiful downtown. I recently returned to live in El Paso after spending more than 14 years in Colorado Springs, CO. That city has a smaller but much more beautiful and lively downtown as it is surrounded on three sides by beautiful neighborhoods, all within a few blocks of the heart of downtown. In fact, when I left Colorado in Nov. Colorado Springs was on line to build 6,000 new apartments downtown as their downtown is considered a highly desirable place to live. Contrast that with El Paso, which, although it has many more beautiful historic buildings, suffers from being isolated from the neighborhoods razed to ram the freeway through. Add to add, over the years, downtown Apartments have been demolished to make way for Parking lots. It's impossible to have a lively and successful downtown without people who live there. Widening the freeway and installing a deck park will not fix this, and will displace more people who live near downtown, as well as contributing to the noise and pollution. Please do not allow this!</p>	<p>Thank you for your comment. MPO staff will provide your comment to the Transportation Policy Board and TxDOT for their consideration.</p>
3/8/2022	judy Ackerman	<p>Dear El Paso Metropolitan Planning Organization (MPO) members,</p> <p>Please do everything you can to STOP the expansion of I 10 in downtown El Paso. This project is a waste of money and is an example of environmental injustice.</p> <p>The most compelling argument against the expansion of I 10 is in the report by El Paso County's consultant, Smart Mobility. Inc. The report shows that TXDOT data, upon which this project is based, is faulty at best. It is not possible to build our way out of congestion. And, we don't really have significant congestion in this stretch of I-10. Significantly, we don't want more pollution and noise in historic, urban neighborhoods.</p> <p>Please answer these key questions: Who supports the expansion of I 10 in downtown? How much will it cost? Who will pay? How much of the bill will be paid by El Paso's taxpayers?</p> <p>Answer these questions, and then ask El Pasoans if they want this expansion of I 10.</p> <p>Thank you for considering this issue.</p>	<p>Thank you for your comment. MPO staff will provide your comment to the Transportation Policy Board and TxDOT for their consideration.</p> <p><i>Who supports the expansion of I 10 in downtown?</i></p> <ul style="list-style-type: none"> •The Downtown10 project has the support of the MPO's Transportation Policy Board (TPB). This project was identified as a top priority by the TPB when the Regional Mobility Strategy (RMS) 2020 strategic plan was approved in December 2019. <p><i>How much will it cost?</i></p> <ul style="list-style-type: none"> •The preliminary planning level cost of the project is approximately \$750M. As more engineering and project development activities occur by TxDOT, the construction cost estimate will be refined. <p><i>Who will pay?</i></p> <ul style="list-style-type: none"> •The detailed funding for the project has not been determined yet. However, it is anticipated that the project will be funded by TxDOT through various funding categories. <p><i>How much of the bill will be paid by El Paso's taxpayers?</i></p> <ul style="list-style-type: none"> •Funding for transportation projects in Texas comes mostly from federal and state fuel taxes, vehicle registration fees, state sales tax (Proposition 7), and state and oil and gas production taxes (Proposition 1). Therefore, taxpayers from the entire state of Texas, including El Paso, contribute to the statewide funding pot.

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Date	Name or Organization	Comment	MPO Response
3/8/2022	Kenneth Bell	<p>What impact will the I-10 expansion have on climate change in El Paso? What is the MPO and TxDOT's plan to mitigate the potential damages?</p> <p>What is the plan to deal with the heat island effect?</p> <p>This plan has is estimated to cost \$750 million. TxDOT has only committed to \$62 million. Where is the rest of the \$688 million coming from? How much are taxpayers expected to pay?</p> <p>Which projects will have to be delayed or canceled in order to expand I-10?</p> <p>Proponents claim that this project will alleviate congestion on I-10. Why is the proposed expansion not in East El Paso where most of the congestion resides?</p> <p>How many years will it take to complete the construction of the project? Where will traffic be directed during the construction?</p>	<p><i>What impact will the I-10 expansion have on climate change in El Paso? What is the MPO and TxDOT's plan to mitigate the potential damages?</i></p> <ul style="list-style-type: none"> •It is anticipated that the Downtown10 project will assist in managing congestion along I-10 as traffic volume increase though time. Congested conditions typically lead to higher emission of pollutants from motor vehicles. Detailed analysis at the project level will be performed by TxDOT as the NEPA process continues its course. The MPO has the lead responsibility in the analysis of air quality activities that are documented in the Transportation Conformity Report, and has the goal of reducing emissions of pollutants to an acceptable level. Regarding global warming, the MPO will be actively engaging and supporting specific activities, such as increasing the number of electric vehicles and charging stations, and a comprehensive discussion on land use patterns. <p><i>What is the plan to deal with the heat island effect?</i></p> <ul style="list-style-type: none"> •The concept of heat islands is complex. The MPO will engage the regional stakeholders in a discussion of current land use patterns and trends, and how alternative patterns can reduce the urban sprawl and consequently manage the heat island effect. <p><i>This plan has is estimated to cost \$750 million. TxDOT has only committed to \$62 million. Where is the rest of the \$688 million coming from? How much are taxpayers expected to pay?</i></p> <ul style="list-style-type: none"> •As of this moment, TxDOT has only committed to fund \$4 million. The MPO will be working in partnership with the Texas Transportation Commission and the TxDOT Administration to develop a funding formula for the project. Given that funding for transportation projects comes from various federal and state taxes, we all contribute to paying for transportation improvements since we all are taxpayers. <p><i>Which projects will have to be delayed or canceled in order to expand I-10?</i></p> <ul style="list-style-type: none"> •That decision has not been made yet but it is anticipated that some projects will have to be reprioritized. That decision will be made by the MPO's Transportation Policy Board in the future. <p><i>Proponents claim that this project will alleviate congestion on I-10. Why is the proposed expansion not in East El Paso where most of the congestion resides?</i></p> <ul style="list-style-type: none"> •In addition to the short- and long-term mobility benefits it will provide, the Downtown10 project has become a priority given the urgent need to reconstruct it.. The pavement and bridge structures along that segment of I-10 are in bad shape and need to be replaced. <p><i>How many years will it take to complete the construction of the project? Where will traffic be directed during the construction?</i></p> <ul style="list-style-type: none"> •The detailed answers to these questions can be provided by TxDOT. However, it is anticipated that the project will take several years to complete. Traffic control patterns will be designed by TxDOT to ensure that traffic flows safely during construction and through construction zones and as efficiently as possible.
3/8/2022	Lizabeth J. Berkeley	<p>Dear El Paso Metropolitan Planning Organization;</p> <p>I have been working with my neighbors in the El Paso High neighborhood improvement organization and we have been overwhelmed by the number of purely top-down decisions the city has made. The most shocking of them, in my opinion, is making El Paso an even more freeway-oriented city: widening I-10 and encouraging more traffic and pollution. The time that we are living in is characterized by increasing environmental awareness, terrible inflation, gas prices ballooning, and young people craving walkable cities with decent mass transportation. It almost feels like we are living on different planets and in different eras than the MPO.</p> <p>El Paso has often been out of step with national trends. This is an opportunity for us to actually make some choices that reflect a world we are part of and that may even surprise our sister Texas cities with our forward, not backward, choices. Please think about and actually LISTEN to what type of city people both old and young really want!</p>	<p>Good Evening Ms. Berkeley,</p> <p>Thank you for your comment. El Paso MPO staff will provide it to the Transportation Policy Board for their consideration. We also encourage you and all concerned members of the public to participate in the ongoing project development activities being undertaken by the I-10 project sponsor, the El Paso District Office of the Texas Department of Transportation.</p>

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Date	Name or Organization	Comment	MPO Response
3/8/2022	Veronica Carrillo	<p>Dear MPO:</p> <p>I am writing to express my extreme concern about TXDOT's plans to widen I-10 and add frontage roads from Copia to Executive, a project titled Downtown 10.</p> <p>Reasons for why I am strongly opposed to this project are many and here are just a few:</p> <ul style="list-style-type: none"> •Connectivity: Other cities are deciding not to widen highways- and are even removing highways- to build boulevards instead. (See attached PDF.) Connectivity through the use of boulevards that allow for multi-modal transportation (bus, bicycle and walking) is key to effective transportation. Let's show that El Paso has vision. Widening I-10 isn't progress, it's just more of the same failed and misguided approach that has been used for decades. •Poor user of resources and money: Wider highways have been shown to be ineffective (induced demand) in addressing congestion. Even if there was a problem with congestion between Copia and Executive, the Katy Freeway in Houston, at 26 lanes wide, has demonstrated that we can't build our way out of congestion, no matter how wide we make the freeway. Widening I-10 would be a waste of resources and money. •Lack of transparency and inclusivity in the planning process: A minimum of 30 days for public comment is required. Public comment was extended to 45 days. The requirement was met but TXDOT and the MPO have failed to give adequate time for the community to read, digest and understand the three plan documents that are more than 350 pages combined. These documents were readily available only in English for a community where, according to the U.S. Census Bureau, 70% of residents speak a language other than English at home. The information is technical and hard to follow for those of us not well versed in transportation. Where was the community outreach by MPO or TXDOT? •Pollution: I-10 already creates a lot of pollution, we can't afford anymore. Traffic pollution has already been confirmed by researchers to be linked, without a doubt, to diabetes and a host of other health issues that impact the elderly and children the most, even affecting children's ability to learn. The communities that have suffered the most from traffic pollution are those of BIPOC households. I-10 is already just a block away from where people live. The Downtown 10 project will increase traffic and bring it even closer to neighborhoods. There are serious environmental justice issues at play here that the MPO and TXDOT have given very little to no consideration. <p><i>(PDF Document attached at bottom of matrix (see Attachment #2))</i></p>	<p>Good Evening Ms. Carrillo,</p> <p>Thank you for your comment. El Paso MPO staff will provide it to the Transportation Policy Board (TPB) for their consideration. We also encourage you and all concerned members of the public to participate in the ongoing project development activities being undertaken by the I-10 project sponsor, the El Paso District Office of the Texas Department of Transportation. While the full text of the documents was not translated into Spanish, all public meeting presentation and outreach materials were made available in both English and Spanish.</p>
3/8/2022	Alyssa Garza	<p>Hello,</p> <p>I am submitting public comment and a resident of district 7. I have a few questions.</p> <ol style="list-style-type: none"> 1. Is the cost of buying businesses and homes to expand i10 included in the budget for this project? 2. How does the MPO plan to deal with the folks who are displaced by the project? Is there a plan in place? 3. Who will be reviewing the deck plaza project and ensure practices are sustainable? <p>I would appreciate any answers to these questions since the project is a big. It would have a lot of impacts on communities and it needs to be considered more carefully. As the recent reports state, the project will not induce traffic.</p>	<p>Good Evening Ms. Garza,</p> <p>Thank you for your email. Please see responses to your questions below:</p> <ol style="list-style-type: none"> 1. & 2. The project sponsor (the El Paso District of the Texas Department of Transportation (TxDOT)) is required by federal law to furnish fair compensation to the owners of any properties that need to be acquired for the completion of the project. TxDOT has not selected a preferred alternative for the design of the project, and as a result the number and location of properties to be acquired has not been finalized. Nevertheless, the project budget does include an estimate for property acquisition. 3. As the project sponsor, TxDOT is responsible for project design and engineering, to include construction materials and practices. While it is not the role of the MPO to evaluate project sustainability measures specifically, the Transportation Policy Board can and does consider the environmental impact of projects as part of its project prioritization process. The project will need to go through National Environmental Policy Act (NEPA) review, at which point a detailed analysis of potential environmental impacts will be assessed. As the project is still in the planning stage, the MPO is only reviews for conformity with air quality standards. <p>Thank you again for your comment, and we encourage you and all concerned members of the public to participate in the ongoing project development activities being undertaken by the I-10 project sponsor, the El Paso District Office of the Texas Department of Transportation.</p>

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Date	Name or Organization	Comment	MPO Response
3/8/2022	Morten Naess	<p>From Morten Naess Sunset Heights, El Paso</p> <p>Dear Members of the El Paso MPO, Thank you for your interest in the opinions and concerns of El Pasoan's regarding Texas Dept Transportation's current plans for billion dollar revisions in I-10 as it passes through downtown, and for agreeing to answer questions we might have about the costs and benefits of this project on our lives. For several years now I have heard El Pasoan's expressing concerns about how their future safety and health, their quality of life as well as their environment, will be affected by Tx Dots plans. People are skeptical about TxDot's projections of traffic needs in this changing world and studies have shown that more lanes is frequently NOT a way to relieve congestion. Its easy to think of TxDot as a brilliant and energetic bunny rabbit that can do , and only do, one thing: make beautiful concrete bridges and highways. This is not the 1960s and we ve learned a lot about highways through center-cities since then. Tx Dot needs to open its mind and think outside the box.</p> <p>So, does the highway really NEED to be widened? Are the projected benefits real? Are the costs for El Pasoans' lives and the environment fully realized and has the public been properly appraised? Is public transportation, alternative transportation, walking, etc. in the mix at all? Please answer these specific questions:</p> <p>What is TxDot's response to the concept of induced demand and its effect on congestion relief by widening?</p> <p>TxDot has praised the value of, and expressed the need for ROBUST public comment on their plans from El Paso residents who stand to be most affected by their work. Do they feel they have a mandate of approval from the that public's participation?</p> <p>Thank you for considering my thoughts and answering my questions</p>	<p>Good Evening Mr. Naess,</p> <p>Thank you for your comment. El Paso MPO staff will provide your comment to the Transportation Policy Board for their consideration. Reach out to TxDOT with your questions. We also encourage you and all concerned members of the public to participate in the ongoing project development activities being undertaken by the I-10 project sponsor, the El Paso District Office of the Texas Department of Transportation, particularly since your questions are directed at TxDOT.</p>
3/8/2022	Luis Enrique Miranda	<p>Dear Metropolitan Planning Organization,</p> <p>Data shows the proposed widening project would worsen traffic, not alleviate it. Evidence of this is across major cities in east Texas, where TxDOT made things worse, and as evidenced by their pushing of more freeway expansion, refuse to learn from their mistakes.</p> <p>A perfect and famous example is the Katy Freeway in Houston, Texas. Despite having 26 lanes including feeder lanes, it was ranked the second worst bottle-neck in the country in 2004.</p> <p>The question is, why do you support an expansion project that will not fulfill its supposed purpose?</p> <p>What hotspots has MPO identified, related to the proposal to widen I-10 near Sunset Heights and farther east? Please specify the exact boundaries of the hotspots, explain why. If you intend to do so in the future, what is the schedule for that work and how will you be designing the work to determine boundaries?</p> <p>If you are designing a hotspot technical report, please provide the plans to the community.</p>	<p>Good Evening Mr. Miranda,</p> <p>Thank you for your comments. MPO staff will provide your comments to the Transportation Policy Board for their consideration. The travel demand model (TDM) developed by the MPO indicates that traffic will increase on I-10 regardless of any improvements made – considering this, the I-10 improvements proposed by the El Paso District of the Texas Department of Transportation (TxDOT) serve to limit the occurrence of increased congestion on I-10 in the downtown area. Increased freeway congestion is a known cause of increased motor vehicle emissions, meaning I-10 improvements also play a role in mitigating air quality concerns both in the immediate area and regionwide. Additionally, the surface of I-10 and the downtown overpasses are approaching the end of their design life, and need to be replaced. Considering these trends and impacts, the I-10 improvement project is projected to fulfill its intended purposes. Additional project-level analysis will be conducted by TxDOT in the future. We encourage you and all concerned members of the public to participate in the ongoing project development activities being undertaken by the I-10 project sponsor, the El Paso District Office of the Texas Department of Transportation.</p>

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Date	Name or Organization	Comment	MPO Response
3/8/2022	Frida Murga	<p>Good evening,</p> <p>I am emailing regarding the proposed I-10 expansion. I have many concerns regarding the destruction of our community and environment as a result of this expansion. Please see my questions below:</p> <ul style="list-style-type: none"> - How will the city mitigate the noise pollution to surrounding neighborhoods? - How will the city mitigate toxic vehicle pollution resulting from increased traffic? - How will the city address displaced citizens from the proposed demolished buildings? <p>I look forward to hearing your responses. Thank you.</p>	<p>Good Evening Ms. Murga,</p> <p>Thank you for your comment and questions. MPO staff will provide them to the Transportation Policy Board for their consideration. To clarify, the City of El Paso is not the entity responsible for the I-10 improvement project - your questions would be best directed to the El Paso District of the Texas Department of Transportation (TxDOT), which is the sponsoring entity for the project. TxDOT is responsible for developing plans and strategies to limit negative impacts of the project during construction and after completion, including noise pollution. Regarding pollution, the MPO's travel demand model indicates that traffic will increase on the downtown portion of I-10 regardless of any improvements to the roadway. If traffic increases on I-10 without improvements being made, congestion levels will increase. Increased congestion levels are known to lead to increased vehicle emissions, negatively impacting air quality. Regarding displacement, TxDOT is required by federal law to provide fair compensation to property owners whose property is acquired for project purposes.</p> <p>We encourage you and all concerned members of the public to participate in the ongoing project development activities being undertaken by the I-10 project sponsor, the El Paso District Office of the Texas Department of Transportation.</p>

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Date	Name or Organization	Comment	MPO Response
3/8/2022	Debbie Nathan	<p>From: Debbie Nathan Sunset Heights, El Paso</p> <p>A citizens' group in El Paso, including myself, have been using "Purple Air" consumer devices, calibrated by the Engineering Department at UTEP, to monitor PM2.5 levels in "hot zones" by I-10 in Central El Paso – the same residential and commercial areas where TxDoT proposes to widen the highway. The following questions are based on our activities and supporting research.</p> <ol style="list-style-type: none"> We note that only three EPA/TCEQ monitors currently measure PM2.5 in the entire county of El Paso. None of those monitors are adjacent to I-10. <p>We also note that, per our own monitors and others placed near I-10 and other central highways, PM2.5 levels frequently exceed levels recommended not only by the World Health Organization for annual numbers, but also those numbers shown by recent research to trigger morbidities and mortalities like heart attacks, even when the spike levels are for just a few hours or days.</p> <p>How is MPO doing monitoring of PM2.5 in residential hot spots? Do you have your own monitors? If so, how many and where are they placed? How do you ensure that you are not simply using EPA AQI averages for El Paso County as a whole, which do not reflect hyperlocal PM2.5 levels near I-10?</p> <ol style="list-style-type: none"> What hot spots has MPO identified, related to the proposal to widen I-10 near Sunset Heights and farther east? Please specify the exact boundaries of the hot spots. If you have not identified hot spots, explain why not. If you intend to identify them in the future, what is the schedule for that work and how will you be designing it, to determine the boundaries of the hot spots? If you are designing a hot spot technical report, please provide the plans to the community. If you are already engaged in hotspot analysis and/or have a technical report prepared, please make it publicly available. The TXDOT Air Quality Handbook describes it as a NEPA trigger if "The project is adding capacity and the public has expressed air quality concerns specifically about this project." The public has indeed expressed air quality concerns. This concern triggers public involvement requirements. How do you intend to address these requirements? Please give specific schedules, locations, etc. It has just been announced that \$600 million has been budgeted to expand the Bridge of the Americas, per the MTP regional plan (2050). "I-10 Connect" was projected to ease connection to the Border Highway. But southbound bridge traffic is queuing up and blocking traffic access to direct connection to the Border Highway. This is the opposite of what was supposed to happen. How does this problem incorporate into your air pollution calculations, and into the modeling that the MPO is doing for the TIP and MTP? <p>--</p>	<p>1. Per the RMS2050 Metropolitan Transportation Plan page 5-13, there are twelve air quality monitoring sites in the El Paso region that are part of the Texas monitoring network. Figure 5-5: Texas air quality monitoring sites, shows a map with the four monitors close to highways. TCEQ determines the location of the monitors based on federal guidelines.</p> <p>TCEQ is the agency responsible for all issues related to air quality monitoring in accordance with federal regulations, including location and number of monitors. The MPO relies on TCEQ expertise.</p> <p>2. Response: TCEQ, not the MPO, is the lead agency in the measurement of current levels of pollutants in the region. Specific to PM-10, a hot spot analysis is required for individual projects that are located within the PM-10 non-attainment area that add roadway capacity (project-level conformity analysis). The sponsoring agency of the project is responsible for developing the data and performing the analysis following guidance established by EPA and other federal and state agencies. The MPO participates in project level conformity discussions. The PM-10 hot spot analysis is typically performed in parallel to the NEPA process. In the case of the Downtown 10 project, it is anticipated that TxDOT, as the sponsor agency of the project, will develop the data for the corresponding PM-10 hot spot analysis required for project level conformity.</p> <p>3. The sponsoring agency will develop a report at the project level and will be included in the environmental documentation as part of the NEPA process.</p> <p>4. Please see responses above</p> <p>5. The NEPA process is the responsibility of sponsor agencies (i.e., TxDOT), not the MPO, given that it is for specific projects. We encourage you to follow the project development activities by TxDOT for Downtown10 and to participate in the public engagement activities.</p> <p>6. The recently announced BOTA improvements are not part of the RMS MTP. The MPO was not made aware of this in time to be evaluated and included. Regarding I-10 Connect, the project is almost complete and fully open to traffic. Since it is no longer a project but part of the built network, its benefits or impacts are captured as we perform the regional modeling.</p>

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Date	Name or Organization	Comment	MPO Response
3/8/2022	Washington-Delta Neighborhood Association	<p>To whom it may concern:</p> <p>The Washington-Delta Neighborhood Association (WDNA) located in South East Central , between I10 and the border highway and just east of US54.</p> <p>This neighborhood is already exposed to high levels of vehicular pollution and noise. We understand that the MPO has made the project known as Downtown 10 a priority. When that project takes place, traffic will be routed over the Spaghetti Bowl to the Border Highway. However, traffic is already backing up, preventing vehicles from accessing the Border Highway. Was this expected? How does what is happening now compare with MPO projections for this project? If the MPO does not know, who does? The MPO approved this project based on certain TXDOT projections. Is the MPO not responsible for following up to ensure that the projections were accurate? If not, what is the point of having public comment? Where does the accountability lie?</p> <p>We do not want even more traffic caused by major highway projects in our neighborhoods. Are there environmental justice rules that apply? What are they? How are YOU protecting our neighborhood with these plans? Do your plans include transit, or alternative routes? What are those, and how do they protect our neighborhood?</p> <p>We also support other neighborhoods in their concern about expanding I-10 Downtown. We do not understand why you need to add even more highways when there already is a parallel highway to I-10, the border highway. We ask that you do not include I-10 widening and frontage roads in your plans.</p> <p>Washington-Delta is part of a community that lives within three major highways, which make walkability outside our immediate area challenging. How do your plans make it any better?</p> <p>We hope that you strongly consider our feedback as the people that will have to live with the plan you implement.</p>	<p>Good Evening Ms. Renteria,</p> <p>Thank you for your comments. MPO staff will provide your comments to the Transportation Policy Board for their consideration. Many of your questions and concerns would best be directed to the Downtown10 project sponsor, the El Paso District of the Texas Department of Transportation (TxDOT). We encourage you and all concerned members of the public to participate in the ongoing project development activities being undertaken by TxDOT. Regarding traffic around the spaghetti bowl area, while the I-10 Connect project was intended to help improve congestion problems associated with the Bridge of the Americas, it cannot be considered a "cure all." In part this is due to issues with customs inspection processes on the Mexican side of the border that cause backups on the US side. The MPO is committed to working with stakeholders on both sides of the border to further address these issues. Additionally, as the project sponsor TxDOT is required to develop plans for traffic redirection throughout the construction phase of the project. While there is an attempt to mitigate the impact of traffic redirection during construction as much as possible, the temporary reduction of traffic capacity caused by construction often does result in additional congestion, including streets that normally do not experience congestion.</p> <p>It should be noted that the impetus for the Downtown 10 project is that the I-10 roadway surface and overpasses are reaching the end of their design life and need to be replaced for safety purposes. What has not been determined as of yet the preferred design alternative to be constructed as part of the project.</p> <p>The MPO's travel demand model (TDM) projects that traffic volumes will increase whether I-10 improvements are completed or not. While the Border Highway and other routes do serve a crucial role in providing alternative routes for some of this traffic, projections indicate that congestion will increase on I-10 in the future.</p> <p>An analysis to identify environmental justice (EJ) population was conducted and is presented in Chapter 2 of the RMS 2050 MTP on Page 2-8 (https://www.elpasompo.org/RMS2050MTPDocument). In addition, MTP projects potentially impacting the identified Environmental Justice areas were identified in Chapter 5 on Page 5-19. Utilizing the travel demand model outputs, a comparison of overall travel times throughout the region were compared to those for EJ areas, and no significant differences were identified such that would disproportionately affect minority and/or low-income populations.</p>
3/8/2022	Robert and Yvonne Ferrell	<p>To whom it may concern,</p> <p>We oppose the widening of the I -10. It is not the solution and it will make the problems worse. More cars and more pollution. We don't need to divide the city with the chaos of more motor vehicles. We are also opposed to thee demolition of properties and the displacement of El Pasoans. Sunset heights has many older people and widening will make their lives harder.</p>	<p>Good Evening Mr. & Mrs. Ferrell,</p> <p>Thank you for your comments. MPO staff will provide your comments to the Transportation Policy Board for their consideration. We encourage you and all concerned members of the public to participate in the ongoing project development activities being undertaken by the I-10 project sponsor, the El Paso District Office of the Texas Department of Transportation.</p>

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Date	Name or Organization	Comment	MPO Response
3/8/2022	Richard Genera	<p>Good day members of the MPO, my name is Richard Genera and I'm writing to urge you to vote against the Downtown I10 expansion project.</p> <p>If TxDot is convinced this displacement is necessary, why should those being displaced shoulder the costs?</p> <p>As I drive from the far East to Downtown every morning, I see a grimy veil of smog, hovering over the downtown area. More vehicles will inevitably lead to more pollution and health risks.</p> <p>Why should residents and business owners be pushed off their properties? Could you look a resident in the eye and tell them their homes are worth the extra 5 minutes saved on I10? Could you tell an asthmatic El Paso child that their health is worth less than your convenience?</p> <p>I appreciate the desire to trust in professional opinions, versus only comments from the public, and the County has delivered. The County hired an outside consultant whose topline of the report was simply "I-10 congestion claims are overstated." The report even provides more suitable and sustainable alternatives. Please read through this report, the sustainability of our city is dependent on it.</p> <p>This project as proposed is not in El Paso's best interest, and I urge you to reconsider your support for this project. Thank you</p>	<p>Good Evening Mr. Genera,</p> <p>Thank you for your comments. MPO staff will provide your comments to the Transportation Policy Board for their consideration. We encourage you and all concerned members of the public to participate in the ongoing project development activities being undertaken by the I-10 project sponsor, the El Paso District Office of the Texas Department of Transportation.</p> <p>Regarding land acquisition, the project sponsor is required by federal law to furnish fair compensation to the owners of any properties that are acquired or otherwise made unusable by the completion of the project. Until a preferred alternative for the project is selected, it is unclear how many properties will be subject to this compensation.</p> <p>El Paso MPO looks forward to receiving the final version of El Paso County's consultant report on the MPO travel demand model and the Downtown 10 project. The regional transportation planning process is a continuous one, and the TPB will have the opportunity to consider changes to projects utilizing new information after the approval of the RMS 2050 documents.</p>
3/8/2022	Sarah Garza	<p>Hello,</p> <p>I am a resident of district 7 and submitting public comment against the i10 expansion and deck park. El Paso has bad air quality and we should not be increasing infrastructure that promotes driving.</p>	<p>Good Evening Ms. Garza,</p> <p>Thank you for your comment. El Paso MPO staff will provide your comment to the Transportation Policy Board for their consideration. We also encourage you and all concerned members of the public to participate in the ongoing project development activities being undertaken by the I-10 project sponsor, the El Paso District Office of the Texas Department of Transportation.</p>
3/8/2022	Ana Fuentes	<p>Scientific studies demonstrate the need to decrease emissions caused by vehicles as well as decreasing the overall use of concrete as it contributes to the heat island effect that leads to increased temperatures. From a climate conscious perspective, how can the MPO rationalize the expansion of the freeway as it would increase both the usage of concrete and induce higher congestion which would lead to even more emissions? Additionally, the project would displace historical neighborhoods, how could you consciously displace communities who have historically been marginalized, leading to further systemic oppression to these communities? How are you planning on compensating these displaced families? How did you arrive at the terms of agreement offered to the displaced individuals?</p>	<p>Good Evening Ms. Fuentes,</p> <p>Thank you for your comment. El Paso MPO staff will provide your comment to the Transportation Policy Board for their consideration. Heat island effect is generated by many elements of the built environment, including pavement, rooftops and other man made infrastructure. The MPO will be engaging the regional stakeholders in a discussion of current land use patterns and trends, and how alternative development patterns can reduce urban sprawl, and consequently manage and mitigate the heat island effect. It is anticipated that the Downtown10 project will assist in managing congestion along I-10 as traffic volume increases over time. Scientific studies demonstrate that congested roadway conditions lead to increased emissions from motor vehicles. Detailed analysis of the impacts of the project on air quality will be performed by the project sponsor (the El Paso District of the Texas Department of Transportation, or TxDOT) after the selection of a design alternative for the project. Regarding land acquisition, the project sponsor is required by federal law to furnish fair compensation to the owners of any properties that are acquired or otherwise made unusable by the completion of the project. Until a preferred alternative for the project is selected, it is unclear how many properties will be subject to this compensation. We encourage you and all concerned members of the public to participate in the ongoing project development activities being undertaken by TxDOT.</p>

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Date	Name or Organization	Comment	MPO Response
3/8/2022	Vanessa Medrano	How can the MPO be transparent about what documentation they are sending to consultants to review the I-10 expansion?	<p>Good Evening,</p> <p>El Paso MPO has responded to all requests for data involving the travel demand model (TDM), and has provided data and background information for the 2045 TDM, which is the only model that is currently approved by the Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) for use in regional transportation planning activities. The 2050 TDM will be provided to the FHWA and FTA for review and approval upon adoption of the RMS 2050 Metropolitan Transportation Plan (MTP) and the RMS 2050 Transportation Conformity Report (TCR); the MPO has been advised by state and federal agencies that only the current approved model should be released. Nevertheless, most of the data inputs used in the 2050 TDM are available for public use, either as addenda to the RMS 2050 TCR, or through specific request to the MPO. For entities or individuals with access to software capable of running the TDM, these data inputs can be used to build a travel model that is comparable to the draft 2050 model.</p>
3/8/2022	Carlos Murillo	<p>As a registered voter, resident of El Paso, and frequent user of the I-10 freeway, the expansion of the interstate in downtown El Paso will further destroy the surrounding community without solving any real problem.</p> <p>Traffic and the congestion created on I-10 is not the result of a lack of lanes. Millions of dollars misspent on this issue will only address a surface issue instead of the root cause and worsen air quality.</p> <p>Additionally, the middle of a climate crisis, we should do the bare minimum to help reduce meaningless projects that simply waste state and federal dollars.</p>	<p>Good Evening Mr. Murillo,</p> <p>Thank you for your comment. MPO staff will provide your comment to the Transportation Policy Board for their consideration. We encourage you and all concerned members of the public to participate in the ongoing project development activities being undertaken by the I-10 project sponsor, the El Paso District Office of the Texas Department of Transportation.</p>
3/9/2022	Brandon Carrillo	<p>According to recent data from the CDC, El Paso neighborhoods near I-10 already suffer the worst health effects of air pollution. Rates of asthma, heart disease, kidney disease, and diabetes are higher near downtown along I-10 than anywhere else in El Paso.</p> <p>If we widen I-10 near downtown, then we will increase the air pollution and rates of disease in these areas even further. Census data shows these areas also have the highest poverty rates in El Paso, and they contain the highest concentration of individuals living with disabilities.</p> <p>Instead of funding a project that will diminish the health of so many vulnerable people, please consider alternatives that will improve the health and quality of life of all El Pasoans.</p> <p>Thank you,</p> <p><i>(Images attached at bottom of matrix (see Attachment #3))</i></p>	<p>Thank you for your comments. El Paso MPO staff will provide it to the Transportation Policy Board for their consideration. We also encourage you and all concerned members of the public to participate in the ongoing project development activities being undertaken by the I-10 project sponsor, the El Paso District Office of TxDOT.</p>
3/9/2022	Familias Unidas del Chamizal, the Rio Grande Chapter of the Sierra Club, and Sunrise El Paso	<p>Dear El Paso Metropolitan Planning Organization:</p> <p>Please find attached comments from Familias Unidas del Chamizal, the Rio Grande Chapter of the Sierra Club, and Sunrise El Paso.</p> <p>Thank you!</p> <p><i>(Comment letter attached at bottom of matrix (see Attachment #4))</i></p>	<p><i>(MPO Response attached at bottom of matrix (see Attachment #8))</i></p>

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Date	Name or Organization	Comment	MPO Response
3/9/2022	Kathy Anderson	<p>I am very much against widening I-10. It divided our city when it was first built. Widening will only serve the trucks passing through our city. Those trucks should be diverted through Anthony Gap.</p> <p>The mpo should focus on making it easier to travel on surface streets, walk, ride bikes, and take rapid transit.</p> <p>You could encourage El Pasoans to ride by making it free, thus reducing emissions</p>	<p>Good Evening Ms. Anderson,</p> <p>Thank you for your comment. MPO staff will provide your comments to the Transportation Policy Board for their consideration. El Paso MPO staff encourages you and all concerned members of the public to participate in the ongoing project development activities being undertaken by the project sponsor for the I-10 project, the El Paso District Office of the Texas Department of Transportation.</p>
3/9/2022	County Commissioner David Stout	<p>To whom it may concern:</p> <p>Please see public comment attached, submitted by El Paso County Commissioner David Stout. Thank you.</p> <p><i>(Comment letter attached at bottom of matrix (see Attachment #5))</i></p>	<p><i>(MPO Response attached at bottom of matrix (see Attachment #9))</i></p>
3/9/2022	Maria G. Sanchez	<p>I was under the impression the comments I made at the virtual meeting on 2/17/22 would be sufficient to be included in the official record of public comment. I would like to ask that all comments made at that meeting are included on the official record. But on the off chance that won't be possible, please accept this submission of public comment.</p> <p>As a taxpayer, my dollars may have been used for the County of El Paso to pay 1.2 million dollars for the I-10 study. As a result, I want to make sure this planning process takes into consideration this study as it appears to echo many others that say expansion of highways isn't always the key to alleviate congestion.</p> <p>When will we be able to see the whole of Border Highway East, to the Tornillo Port of Entry, included in planning documents and this entire project increased in priority? This would be beneficial in relieving congestion on Socorro Rd., Alameda, North Loop and I-10. It would also prevent ongoing damage to historical adobe buildings along the historic corridor on Socorro Rd., which is part of a nationally recognized historic trail and efforts are being made to recognize it as a World Heritage Site through UNESCO.</p> <p>Consider the entire region when prioritizing your plans so that vital infrastructure projects take precedence over pleasure and recreation. On our side of town, we would love to see recreational projects as well but we're not even close to our basic needs being met first. For example, how is it that a shared use path is already in short term planning documents on the Westside before we see the light of day on Border Highway East?</p> <p>If we are able to see a project like Border Highway East in my lifetime, please take advantage of all beneficial technology to include plans for public transit, similar to metro lines and charging stations for alternatively powered vehicles. I hope I live to see it!</p> <p>Thank you,</p>	<p>Good Evening Ms. Sanchez,</p> <p>Thank you for your comments. MPO staff will provide your comments to the Transportation Policy Board for their consideration. We encourage you and all concerned members of the public to participate in the ongoing project development activities being undertaken by the I-10 project sponsor, the El Paso District Office of the Texas Department of Transportation (TxDOT). Transcripts of the comments received at the four public meetings will be included in the official record and submitted with the RMS 2050 documents to FHWA/FTA for review. The Border Highway East project is included in the RMS 2050 MTP project list, with the first phase scheduled for funding in 2033, and subsequent phase (four in total) scheduled for later years. This scheduling was determined as part of the project prioritization process, which was a collaborative process including the input of all regional entities, including the County of El Paso and Mission Valley municipalities. While the project was not identified as a short-term priority for the region through this process, the transportation planning process is a continuous one, with the opportunity to move up individual projects depending on their readiness and the availability of funding. El Paso MPO is committed to seeking out additional funding opportunities for the Border Highway East project that will make it feasible to accelerate its completion.</p>

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3/9/2022	Benjamin Sanchez	<p>We've been hearing about the BHE for 40 years but in reality, the 375 Loop goes all the way back to 1962. And most projects are repeatedly done within the El Paso city limits, giving the impression to the public that the BHE is not as necessary. In fact, it seems vanity projects, such as the Downtown Deck Plaza are of higher importance to the MPO, a TRANSPORTATION planning entity, than vital highway access for several underserved communities: Socorro, San Elizario, Fabens and Tornillo. Another unnecessary project is the widening of I-10, which appears to be most important to the creation of the Downtown Deck Plaza, rather than its intended congestion relief that is nonexistent. Lastly, it is a slap in the face to see the Westside not only have the BHW completed for years now but they're even receiving a hike and bike trail--not in the long term plans but as an active project! We have not heard anything about the BHE since the TPB passed a resolution in 2015 supporting this project for inclusion in planning documents. According to the long-term planning document, the MTP, two phases of the BHE are included and slated for the later years of the document. Phase two will end at the future Arterial 1, in Socorro. So what are the plans for the completed project, to the Tornillo Port of Entry? If I'm to believe the MPO planning documents, there are no plans to serve the communities east of Socorro. When can we anticipate seeing future phases of the BHE in the planning documents? And when can we see the current phases expedited to see an increase in priority? I was in my 30's when I first heard about this future highway. I'm now 76 and it seems I won't live to actually see this important project in my lifetime.</p> <p>Thanks for hearing me out.</p>	<p>Thank you for your comments. MPO staff will provide your comments to the Transportation Policy Board for their consideration. We encourage you and all concerned members of the public to participate in the ongoing project development activities being undertaken by the I-10 project sponsor, the El Paso District Office of TxDOT. The Border Highway East (BHE) project is included in the RMS 2050 MTP project list, with the first phase scheduled for funding in 2033, and subsequent phase (four in total) scheduled for later years. This scheduling was determined as part of the project prioritization process, which was a collaborative process including the input of all regional entities, including the County of El Paso and Mission Valley municipalities. However, it is important to note that two very important projects that will provide connectivity to Socorro and San Elizario are the extension of Nuevo Hueco Tanks (from North Loop to Alameda) and Arterial 1, that will eventually connect Socorro Road to I-10. These two projects are scheduled in the near term. While the BHE project was not identified for the short term, once Nuevo Hueco Tanks and Arterial 1 are in place, the two phases of BHE will improve connectivity even further in that area. Also, the transportation planning process is a continuous one, with the opportunity to move up individual projects depending on their readiness and the availability of funding. El Paso MPO is committed to seeking out additional funding opportunities for the Border Highway East project that will make it feasible to accelerate its completion.</p>

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Date	Name or Organization	Comment	MPO Response
3/9/2022	El Paso County Commissioners Court	<p>Dear Chairman Miller,</p> <p>At the regular session of the El Paso County Commissioners Court held on March 7, 2022, the Court voted unanimously to submit the following additional public comment to the El Paso Metropolitan Planning Organization's Call for Public Comment regarding the development and upcoming adoption of the Regional Mobility Strategy (RMS) 2050 Metropolitan Transportation Plan (MTP), RMS 2023-2026 Transportation Improvement Plan (TIP), and Transportation Conformity Report (TCR). The Court is appreciative of the dialogue that MPO and County staff have engaged in over the past several weeks after the County submitted public comment on February 22, 2022. This, as well as the extension of the public comment period through March 9, have allowed for a productive conversation to continue to develop regarding further refinement of the region's transportation priorities.</p> <p>Specifically, the County offers the following additional items for the MPO's review and consideration:</p> <ol style="list-style-type: none"> 1. The County wishes to revise the details and findings previously submitted to the MPO with respect to implementation of dynamic traffic assignment (DAT) modeling for the entire MPO region. Utilizing a third-party research entity, such as the Texas A&M Transportation Institute, may identify methods to strategically introduce elements of DAT throughout the MPO planning area within strategic corridors or designated sub-areas. The County remains committed to working through and partnering with the MPO to evaluate this proposal further moving forward. Additionally, both agencies should monitor the progress of the North Central Texas Council of Governments – Transportation Department's Request for Information (published March 4, 2022), requesting information on introducing DAT throughout the NCTCOG planning area. This information may help inform decisions on the future of DAT in large urban planning areas. 2. While the previously submitted report regarding the Downtown I-10 Segment 2 Project is relevant to regional transportation planning, a majority of the sections contained within that report are more appropriate for discussion with the El Paso District of the Texas Department of Transportation (TxDOT) and not necessarily the MPO. That said, any further revisions to the report and its findings, including any additional analysis, will be communicated with TxDOT as well as the MPO. 3. The County's request for access to the Draft 2050 Travel Demand Model remains outstanding. This tool would assist the County and its consultant to complete relevant tasks to evaluate the Downtown I-10 Segment 2 Project. The County will be requesting guidance, clarification, and information from the Federal Highway Administration regarding the MPO's ability to share this critical tool with the County for the purposes of technical evaluation only. The County will share the results of this information with the MPO as it becomes available. <p>Thank you for your critical work on this issue and we look forward to continuing the dialogue to make the MPO's Regional projects successful in meeting the present and future needs of the El Paso region collectively.</p>	<p>El Paso MPO looks forward to collaborating with El Paso County and other local partner entities on further exploring opportunities to improve all modeling activities. The MPO wishes to remain up-to-date in its strategies and processes in order to best plan for the future of the regional transportation network. MPO staff met with the County's consultant on March 15th to provide further guidance on using available data in conjunction with the currently approved Travel Demand Model to complete the evaluation of the project. The MPO looks forward to receiving the final report from the consultant, and to continuing to participate with the County and TxDOT in the conversation on the Downtown 10 project.</p>

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3/9/2022	Ted Houghton	<p>Below are my comments regarding the RMS 2050 plan.</p> <p>The El Paso MPO is a well thought out and comprehensive and also takes into account our region's projected traffic demands. The analysis regarding transit ,rail and multimodal options ensure that a range of transportation options are analyzed. The regions international ports of entry require consideration such as bridge wait time and commercial traffic that are account for in the analysis.</p> <p>The plan also takes into account the federally mandated processes and procedures to ensure a comprehensive analysis. One major project of regional significance is the modernization of I-10 Segment 2 from Executive Center to Cobia. It is a needed as gridlock occurs at the location due to lane contraction on I-10 and outdate operational modes.</p> <p>Lastly, the plan takes in account all areas of the region while analyzing traffic patterns during different times of usage.</p> <p>Thank you,</p>	<p>Thank you for your comment. It will be provided to the Transportation Policy Board for their consideration.</p>
3/9/2022	Steve Ortega	<p>I have reviewed the RMS 2050 and submit comment in support of the document. The document comprehensively analyzes transportation concerns in our region in a manner that is multimodal, multifaceted and takes into account the unique characteristics of our border border region. The El Paso MPO is to be congratulated for its comprehensive analysis.</p>	<p>Good Evening Mr. Ortega,</p> <p>Thank you for your comment. It will be provided to the Transportation Policy Board for their consideration.</p>

PUBLIC COMMENTS AND RESPONSES RECEIVED DURING PUBLIC COMMENT PERIOD (JANUARY 24 - MARCH 9, 2022) FOR THE REGIONAL MOBILITY STRATEGY (RMS) 2050 METROPOLITAN TRANSPORTATION PLAN (MTP), RMS 2023-2026 TRANSPORTATION IMPROVEMENT PLAN (TIP), AND TRANSPORTATION CONFORMITY REPORT (TCR)

Date	Name or Organization	Comment	MPO Response
3/9/2022	Sunset Heights Neighborhood Improvement Association	<p>Dear MPO:</p> <p>Please accept this public comment on behalf of the Sunset Heights Neighborhood Improvement Association (SHNIA).</p> <p>As you know, we are concerned about the inclusion of the project known as Downtown 10 in the MTP, and its likely inclusion to the TIP as an amendment after this process.</p> <p>Question 1: We would like to know, step-by-step, the process of adding Downtown 10 to the TIP once it is funded so it is "financially constrained." If we understand correctly, that means a project is funded, making it eligible. If Downtown 10 is funded, what public comment period or other opportunities are available? How do the environmental justice and other calculations factor into the MPO-developed TIP and MTP calculations for pollution, noise, heat, or other criteria the MPO is required by federal law to address?</p> <p>Questions 2: We notice that the "deck park" is in the plan, although it has not been funded. Is this because it is listed as being privately funded? What happens if the funding is distributed through a private or non governmental organization, but the funding itself comes from a government agency? Is this a "workaround" for the requirement projects be funded before being added to the TIP?</p> <p>While we have not taken a position on the deck park, we consistently have expressed concern that the proposal is being used to sell the added lanes and high intensity frontage roads proposed by Downtown 10, or even worse, to "greenwash" the Downtown 10 proposal. We also are concerned that the MPO has taken an advocacy position regarding the deck park, as opposed to similarly advocating for mass transit, eliminating roadways in environmental justice communities, or otherwise mitigating the disproportionate impact of highway facilities on vulnerable communities, including but not limited to residents of Sunset Heights who live closest to the highway.</p> <p>Questions 3: Excluding the deck park proposal, what are the actual amounts in dollars of total funding in the TIP and MTP drafts for bike lanes, mass transit, safe sidewalks, road repairs, projects that can be considered "mitigation" or "environmental justice," and new road capacity? What are those amounts with the Downtown 10 project included? What are those amounts with the deck park proposal added, and is there a legal or procedural classification for the deck park proposal?</p> <p>SHNIA has consistently raised questions about the impact of Downtown 10 as described by adding lanes and continuous frontage roads to the I-10 facility in terms of added pollution, noise, vibration, and heat that primarily affects low-income and minority residents living in historic neighborhoods. Public comment has continuously opposed the project as proposed, and top responses to MPO surveys include quality-of-life, environmental considerations, and safety. Public comment also consistently focuses on the poor pavement condition of existing streets, "stroads," and roads.</p> <p>Questions: Congestion management was toward the bottom of criteria in MPO surveys. What is the breakdown of public comments for and against Downtown 10 through the various MPO comment periods regarding Downtown 10 or processes that advance Downtown 10? How are those comments weighted? Why are the top four RMS projects either new roads and/or new capacity? Why are the Downtown 10 alternatives only "build" in various configurations that all add capacity, or "no build"? Why is there no "reconstruct as is" or "reconstruct the Trench only" option? What would be the MPO role in recommending those options be included for study, and will the MPO do so?</p> <p>There is a lack of actual air monitoring data. El Paso is non attainment. It is worst during temperature inversions. We also have a continuous back and forth flow between El Paso and Juarez, which is expected to grow, especially regarding freight.</p> <p>Questions: What is the baseline emissions inventory based on? Is it the 1994 PM10 Emissions Inventory? If so, is there a more recent inventory that could be used? If so, why is it not being used? How are vehicles from Juarez, especially trucks, which are far more polluting and may not be as well maintained in Mexico, incorporated into the model? How is climate change incorporated into the air pollution models?</p> <p>Thank you.</p>	(MPO Response attached at bottom of matrix (see Attachment #10))

PUBLIC COMMENTS AND RESPONSES RECEIVED DURING PUBLIC COMMENT PERIOD (JANUARY 24 - MARCH 9, 2022) FOR THE REGIONAL MOBILITY STRATEGY (RMS) 2050 METROPOLITAN TRANSPORTATION PLAN (MTP), RMS 2023-2026 TRANSPORTATION IMPROVEMENT PLAN (TIP), AND TRANSPORTATION CONFORMITY REPORT (TCR)

Date	Name or Organization	Comment	MPO Response
3/9/2022	El Paso Chamber	<p>On behalf of the El Paso Chamber and its 1400 members</p> <p>The most important regional project is the modernization of Segment 2 of I-10:</p> <ul style="list-style-type: none"> •This project will reduce the burdensome traffic congestion currently the result of the contraction in freeway lanes from 8 to 6 lanes downtown •This project also make our daily commute safer given the age of the pavement •Improved traffic flow, will also positively impact the environmental <p>The plan is well thought out in that it is comprehensive and takes into account our region's projected traffic demands and it takes into account all areas of the region while analyzing traffic patterns during different times of usage</p> <p>The analysis regarding transit, rail and multimodal options ensures that a range of transportation options are analyzed;</p> <p>The region's international ports of entry require considerations such as bridge wait times and commercial traffic that are accounted for in the analysis;</p> <p>The plan takes into account the federally mandated processes and procedures to ensure a comprehensive analysis.</p>	<p>Good Evening Mr. Jerome,</p> <p>Thank you for your comment. It will be provided to the Transportation Policy Board for their consideration.</p>
3/9/2022	Rossy Cardenas	<p>Good Afternoon MPO staff,</p> <p>The El Paso MPO's latest MTP has considered and will address the growing Transportation needs of our Region. It has included projects of high importance to improve our streets for the safety of all its users.</p> <p>it's imperative to bring to high priority the upgrade of our I-10 facility Segments 2 & 3, as both segments become traffic funnels for all the traffic traveling East to West & West to East of our Region.</p> <p>I appreciate the opportunity to comment on this very important plan for the next 28 years of our Region.</p> <p>Thank you,</p>	<p>Thank you for your comment. It will be provided to the Transportation Policy Board for their consideration.</p>
3/9/2022	Mark B. Soyster	<p>As a person who has lived through an I-10 reconstruction in a major metropolitan downtown setting. I truly believe that a deck park in downtown El Paso is a great way to continue to enhance the community and the investments we have made in El Paso by providing additional amenities where neighbors, friends and communities can meet and enjoy our incredible downtown. It will create a new community by connecting the two sides of the freeway. We can't move the freeway, but we can create a new place to live and interact.</p>	<p>Thank you for your comment. It will be provided to the Transportation Policy Board for their consideration.</p>

PUBLIC COMMENTS AND RESPONSES RECEIVED DURING PUBLIC COMMENT PERIOD (JANUARY 24 - MARCH 9, 2022) FOR THE REGIONAL MOBILITY STRATEGY (RMS) 2050 METROPOLITAN TRANSPORTATION PLAN (MTP), RMS 2023-2026 TRANSPORTATION IMPROVEMENT PLAN (TIP), AND TRANSPORTATION CONFORMITY REPORT (TCR)

Date	Name or Organization	Comment	MPO Response
3/9/2022	Brian Smith	As a proud El Pasoan and Project Manager at Sundt Construction on I-10 Collector Distributor Lanes, US 54 and Biggs Army Airfield I support the MPO's Regional Mobility Strategy 2050. The plan take into account all areas of the region while analyzing traffic patterns during different times of usage. This project is critical as we continue to grow and expand as a region. Additionally, this plan takes into account the federally mandated processes and procedures to ensure a comprehensive analysis.	Thank you for your comment. It will be provided to the Transportation Policy Board for their consideration.
3/9/2022	Rudy E. Elias	My name is Rudy Elias, and I'm the Senior Project Manager at Sundt Construction for I-10 Collector Distributor Lanes and US 54. I support the MPO's Regional Mobility Strategy 2050. With my experience working on two different TxDOT projects, I support the MPO's Regional Mobility Strategy 2050. The region's international ports of entry require considerations such as bridge wait times and commercial traffic that are accounted for in the analysis. This is a project of regional significance, which additionally takes into account the modernization of Segment 2 of I-10, which is a needed project as gridlock occurs at that location due to contraction in freeway lanes.	Thank you for your comment. It will be provided to the Transportation Policy Board for their consideration.
3/9/2022	Damian Andrade	<p>To whom it may concern,</p> <p>As a citizen born and raised here in El Paso, TX and part owner of a local family run business on Alameda Ave., I want to share with you my concern about the proposed project to widen I-10 and add frontage roads from Copia to Executive. Across the country, city after city has been promised these sorts of projects will alleviate their traffic issues and it just does not happen. There are plenty of examples of ultra wide freeways that are incredibly congested. It makes sense to thoroughly scrutinize the data that supposedly justifies this project, and seek more comprehensive approaches to our city's transportation needs. We cannot simply expand and expand freeways expecting that to be the solution.</p> <p>Businesses near the freeway in central El Paso need to know how this will impact us. People in our neighborhood know that projects in the past have killed local businesses with how long they take and traffic being redirected and blocked off from certain areas for long periods of time. Locally owned small businesses give El Paso a lot of its character and many times we are treated as an afterthought. Without us there is Walmart, dollar stores, McDonalds and title loans, large companies with the capital to adapt to the whims of local or state governments while we put our own blood sweat and tears directly into building ourselves up and investing in our properties as we are able to, getting to know the needs of people in our neighborhood, being involved because we live here and love El Paso. If we aren't taken into account then what does that say for everyone else? Historically, home owners are NOT fairly compensated for what they lose when they are forced to leave by eminent domain. We need to know how this will impact our air quality, which is already terrible.</p> <p>The downsides are numerous, we need to really ask if this is necessary and will actually benefit El Paso. Do the models or any other means of analysis TxDOT uses accurately reflect our reality? We need more than "well technically you could have shown up to some meeting you may or may not have heard about, just to be disregarded in person" which we are all too familiar with. We are thankful that some of our local elected officials have spoken out about this issue.</p> <p>TxDOT needs to use tax dollars wisely and ALL of our neighborhoods need to be taken into account when creating these sorts of plans. The people of El Paso need real transportation options, only thinking about cars will not solve our problems. We need better public transit. If all these funds are being allocated by the government for questionable projects, certainly they can be allocated to something actually beneficial. Long time customers tell us some neighborhood bus routes have been cut down and it makes it harder for them to come shop downtown/central. The Sun Metro buses are important to the health of our community in many ways. Both youth and elderly, disabled El Pasoans, anyone can be more independent without the expense and stress of a personal vehicle if they don't personally need it very much or if they are unable to drive. Hopefully different entities dealing with our transportation systems can work together to make positive changes.</p> <p>Thank you for your time, please help us challenge this.</p>	<p>Thank you for your comments. El Paso MPO staff will provide it to the Transportation Policy Board for their consideration. We also encourage you and all concerned members of the public to participate in the ongoing project development activities being undertaken by the I-10 project sponsor, the El Paso District Office of the Texas Department of Transportation.</p> <p>The models used by the MPO are considered state of the practice and are widely accepted in the transportation industry and are used to comply with all federal and state transportation laws and regulations. The MPO models are used for regional analysis. For individual project analysis, different models are used by the implementing agencies, such as TxDOT for the Downtown10 project. These models are intended to provide more detailed information that are used for designing features of the project.</p> <p>Regarding land acquisition, the project sponsor is required by federal law to furnish fair compensation to the owners of any properties that are acquired or otherwise made unusable by the completion of the project. Until a preferred alternative for the project is selected, it is unclear how many properties will need to be acquired.</p> <p>Regarding your comment about transit, we understand the challenges that Sun Metro and other providers are facing, such as declining ridership that has led to cuts in service. It is a trend that unfortunately is being seen throughout the country.</p>

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Date	Name or Organization	Comment	MPO Response
3/9/2022	Marc Salazar	<p>I reside close to a high traffic/high pollution area, the Bowie/Chamizal area. I believe I've seen some of the areas problems firsthand and the concerns parents have had for their children being exposed to elevated levels of environmental hazards. Much can be blamed on the policies and practices of our governing bodies that have resulted in creating these conditions and not doing more to rectify them.</p> <p>I am against the expansion of I-10 downtown to include a possible deck park. My reasons include some of the same concerns mentioned about the Chamizal area only now the Sunset and Downtown areas. I believe the environment must be preserved and restored as necessary such as to avoid excessive traffic, noise and air pollution, eviction and displacement of communities and businesses, etc. and also to avoid unnecessary expense and years of construction. I believe more must be done to improve and ensure a healthier environment in the area and beyond.</p>	<p>Thank you for your comments. El Paso MPO staff will provide it to the Transportation Policy Board for their consideration. We also encourage you and all concerned members of the public to participate in the ongoing project development activities being undertaken by the I-10 project sponsor, the El Paso District Office of TxDOT.</p>
3/9/2022	Federico Villalba	<p>Dear EPMPO/TXDOT,</p> <p>I would like to convey my disapproval of the proposed plans to raze large swatches of Downtown El Paso and historic Sunset Heights neighborhood. I speak this view from the point of view of an environmentalist, cyclist, father, grandfather of seven, and member of family of seven that was abruptly uprooted from our nice red brick house on Memphis Avenue in Central El Paso when the North/South Freeway burned a permanent scar through Northeast and Central El Paso. Please note that I moved back to Central El Paso in my later years and have many friends and acquaintances in Sunset Heights and surrounding area that are against this plan. They love their older neighborhoods like they are, just like people in Central and other parts do.</p> <p>What is being planned will destroy a part of a historic and beautiful neighborhood and will result in more traffic and pollution. We need to start making positive changes to respect the quality of life and health of our citizens and stop advancing the old 20th century thinking of building more and more congested roads and freeways for the heavy polluting gas and diesel engine. I am hearing where recent studies forecast that this plan will do nothing to improve existing traffic flow, pollutions levels, and the general health of our citizens.</p> <p>Thank you for giving me the opportunity to voice my thoughts on this matter.</p>	<p>Thank you for your comments. El Paso MPO staff will provide it to the Transportation Policy Board for their consideration. We also encourage you and all concerned members of the public to participate in the ongoing project development activities being undertaken by the I-10 project sponsor, the El Paso District Office of TxDOT.</p>
3/9/2022	Angelica Rosales	<p>My name is Angelica Rosales, and I am the business development representative for Sundt Construction. As a proud El Pasoan I support the MPO's Regional Mobility Strategy 2050. Sundt has built many critical infrastructure projects for El Paso and understands the significant role the MPO's Regional Mobility Strategy 2050 will play in continuing to help our community grow and attract economic development investments for our region. Properly planning for and addressing our infrastructure needs ensures that remain competitive as a region in recruiting new businesses.</p>	<p>Thank you for your comment. It will be provided to the Transportation Policy Board for their consideration.</p>

PUBLIC COMMENTS AND RESPONSES RECEIVED DURING PUBLIC COMMENT PERIOD (JANUARY 24 - MARCH 9, 2022) FOR THE REGIONAL MOBILITY STRATEGY (RMS) 2050 METROPOLITAN TRANSPORTATION PLAN (MTP), RMS 2023-2026 TRANSPORTATION IMPROVEMENT PLAN (TIP), AND TRANSPORTATION CONFORMITY REPORT (TCR)

Date	Name or Organization	Comment	MPO Response
3/9/2022	Peggy Hinkle	<p><i>(Comment email attached at bottom of matrix (see Attachment #6))</i></p>	<p>Thank you for your comments. El Paso MPO staff will provide it to the Transportation Policy Board for their consideration. The EPMP is always looking at ways of improving its processes and engaging in a manner that is cooperative, comprehensive, and continuous.</p> <p>MPO staff provided El Paso County's consultant with all data and documentation associated with the currently approved transportation demand model for the region upon request.</p> <p>El Paso MPO staff looks forward to receiving the final report from the consultant contracted by El Paso County and using it to inform continuing discussions on both the specific project mentioned by the commenter (Downtown 10 Executive Center to SL487COPIA Segment 2) and priorities for the regional transportation network as a whole. El Paso MPO staff encourages the commenter and all concerned members of the public to participate in the ongoing project development activities being undertaken by the project sponsor, the El Paso District Office of the Texas Department of Transportation.</p> <p>The MPO must demonstrate that the future transportation network incorporating the RMS 2050 MTP projects will contribute to improvements in regional air quality. The details of this demonstration are described in the RMS 2050 Transportation Conformity Report. While the conformity report indicates that regional air quality would be improved by implementation of the RMS 2050 MTP projects, project-level conformity is not determined in conjunction with adoption of the project list.</p>
3/9/2022	Scott White	<p><i>(Comment email attached at bottom of matrix (see Attachment #7))</i></p>	<p><i>(MPO Response attached at bottom of matrix (see Attachment #11))</i></p>
3/6/2022	Kathleen Staudt	<p>Esteemed members of the MPO,</p> <p>Thank you for your public service in the complicated issue area of transportation policy. As someone who taught government for forty years, I appreciate political representatives' need to acquire knowledge about many, many complicated policy issue areas and then find a way to communicate policy options to their constituents.</p> <p>Alas, political representatives often rely on techno-crats, bureaucrats and their agendas, despite the bureaucrats' distance from our local realities and their sometimes-limited visions. Such is the case with the TxDOT agenda and modeling seemingly imposed upon our region. All too often, TxDOT's 'talking points' are passed on to El Paso constituents as justifications for I-10 highway widening and the associated negative consequences for pollution, heat islands, and other climate issues such as increased fossil-fuel dependence from gigantic highway transportation.</p> <p>Thankfully, El Paso County Commissioners funded a credible independent traffic consultant to take an expert look at TxDOT models. It is unfortunate that local taxpayers were burdened with the expense, but in my humble opinion, it was well worth the cost. Now we have more information besides the dedicated El Pasoans who have sought to engage and to provide voice to this complicated matter at MPO, TxDOT and other hard-to-access often on-line venues in these pandemic times. Please read that report carefully and be wary of trusting distant bureaucrats with their own limited visions and seeming lack of awareness about climate change and the health consequences of even more pollution in this region.</p> <p>I ask that you read my comment into the public record. Furthermore, I ask that you (1) use tax dollars wisely, whether local or from the state, (2) provide El Pasoans with multiple alternatives for getting around our region, while respecting our neighborhoods, without relying on widening a highway KNIFE that cuts through the heart of our city, and (3) put climate change as top priority before succumbing to TxDOT and its fossil-fuel gobbling approaches. Please remember that, as wise people have said, 'transportation policy IS climate policy.' Think of our futures, our health, and the health of our children.</p> <p>Thank you again for your service,</p>	<p><i>(This comment was not read into the record at the February 18, 2022 TPB meeting due to an incorrect email address. Also, it was an oversight that it was not initially included in the matrix, but it has now been added here to be part of the final comment and response record.)</i></p> <p>Thank you for your comments. We also encourage you and all concerned members of the public to participate in the ongoing project development activities being undertaken by the I-10 project sponsor, the El Paso District Office of TxDOT.</p>

Transcripts of comments and responses provided during public involvement meetings are attached below.

PUBLIC COMMENTS AND RESPONSES RECEIVED AFTER PUBLIC COMMENT PERIOD (JANUARY 24 - MARCH 9, 2022) FOR THE REGIONAL MOBILITY STRATEGY (RMS) 2050 METROPOLITAN TRANSPORTATION PLAN (MTP), RMS 2023-2026 TRANSPORTATION IMPROVEMENT PLAN (TIP), AND TRANSPORTATION CONFORMITY REPORT (TCR)

Date	Name or Organization	Comment	MPO Response
3/10/2022	Marshall Carter-Tripp	<p>I have written about this several times, but want to make sure that I offer one last formal comment. The city of El Paso was disfigured by the construction of a major interstate through the heart of the city in the mid-20th century. The goal now should be minimizing the damage done to the urban fabric. BUILD A BYPASS!!! Other major US cities have followed this - Washington, DC is a good example - enabling traffic that is not directed to the city to avoid city congestion and make its way onward. Service stations can be built on this bypass so local business makes sales, and interstate travelers benefit.</p> <p>Expanding I-10 through central El Paso will also mean increased air pollution in the center of town, at the time when City leaders are trying to "rebuild" Downtown and make it more attractive for visitors and residents alike!</p> <p>Please also focus on providing better public transportation, to reduce the demand for more roads! In particular, consider night-time bus service!!! Especially valuable for older residents who may have visual trouble with night-time driving.</p> <p>Thank you for your consideration,</p>	<p>We appreciate your comment. The MPO is tasked with planning for a balanced multimodal network for the efficient movement of people and goods for the next 20-plus years. There are multiple challenges to achieve this given the growth trends in population and employment within the MPO region combined with our unique geographical constraints. The RMS 2050 MTP includes projects that modernize I-10 as well as providing a bypass through the northern part of the MPO region (Borderland Expressway). The MTP also includes funding for transit services within the MPO region. We encourage you to continue participating in the MPO processes as well as those of the agencies that implement individual projects, such as TxDOT, the City of El Paso, County of El Paso, etc.</p>
3/10/2022	Joseph Riccillo	<p>To Whom it May Concern:</p> <p>As a proud El Pasoan, I support the MPO's Regional Mobility Strategy 2050. The plan is well thought out in that it is comprehensive and takes into account our region's projected traffic demands, which is critical for our continued growth and continued investments in economic development for our region. As El Paso continues to grow, it is critical that we address our infrastructure needs. This plan takes into account the analysis regarding transit, rail and multimodal options ensuring that a range of transportation options are analyzed as we continue growing as a community.</p>	<p>Thank you for your comment. The MPO has the challenging task of providing multimodal solutions that will move goods and people efficiently through the next 20-plus years while considering safety, environmental issues, fiscal constraint, economic development and other important criteria.</p>
3/14/2022	Robert Ferrell	<p>Please reconsider widening the freeway. We who live and work in that area do not want the additional chaos. Traffic should be sent around town; not through the heart of it!!!!</p>	<p>Thank you for your comment. The RMS 2050 MTP includes projects that modernize I-10 as well as providing a bypass through the northern part of the MPO region (Borderland Expressway).</p>

**Transcript of public comments received and
responses during Transportation Policy Board
meeting for RMS 2050 MTP, RMS 2023-2026
TIP, and TCR
(February 18th, 2022)**

PUBLIC COMMENTS AND RESPONSES RECEIVED DURING TRANSPORTATION POLICY BOARD MEETING (FEBRUARY 18, 2022) FOR RMS 2050 MTP, RMS 2023-2026 TIP, AND TCR

Public Comment			MPO Response
Time [Received]	Comment	Speaker [Email]	
2:52:12 [9:32 PM, 2/17/2022]	<p>Please record my comment for the subject meeting Agenda Item No. 7 as follows:</p> <p>Dear Board Members:</p> <p>Serious consideration should be given to the traffic consultant report, and preliminary recommendations for alternatives to the expansion and frontage roads proposal for Downtown 10.</p> <p>We can't build our way out of congestion, no matter how many times we try, or how wide we make the freeway. Adding capacity only encourages more people to drive - and it discourages people from walking, cycling or using transit.</p> <p>Additionally, please get rid of the circular access roads and maintain our street grid. As residents & business owners near Sunset Heights we need a pedestrian and bike friendly path into and out of downtown.</p> <p>The MPO's own visioning exercise showed us that the public wants safer streets, better transit, and a more walkable community. But the MPO's own project lists, show the majority of funding is for new or wider roads almost exclusively for cars.</p> <p>Thank you for your consideration</p> <p>Peace, Hal Marcus & Patricia Medici Home & Business Owners in affected area.</p>	<p>Read at meeting [Received via email from Hal Marcus & Patricia Medici]</p>	<p>El Paso MPO staff looks forward to receiving the final report from the consultant contracted by El Paso County and using it to inform continuing discussions on both the specific project mentioned by the commenter (Downtown 10 Executive Center to SL487COPIA Segment 2) and priorities for the regional transportation network as a whole. El Paso MPO staff encourages the commenter and all concerned members of the public to participate in the ongoing project development activities being undertaken by the project sponsor, the El Paso District Office of the Texas Department of Transportation.</p>
2:48:32 [9:37 PM, 2/17/2022]	<p>Please read this message during public comment.</p> <p>Hello members of the MPO, my name is Richard Genera. I'm a lifetime El Pasoan and have worked downtown for just over eight years.</p> <p>As a tax payer and employee in the downtown area, I find the proposed downtown I10 expansion to be, at best, a misguided and misinformed attempt to solve a non-existent issue, and at worst, a racist and demeaning attempt to squeeze the people of El Paso.</p> <p>This I10 displacement, and it is a displacement, serves to do nothing but increase profits for developers and displace home and business owners, predominately BIPOC residents. We deserve better than this. The proposed additional lanes are not needed. I drive to and from downtown five, even six days a week. Is there traffic sometimes? Sure. Would I trade the lives and livelihood of my fellow El Pasoans to save five minutes of travel time? Absolutely not. Would the half chewed carrot being dangled before us, this "deck park," sweeten the deal? I find this proposed trade off to be pathetic and frankly, insulting. And TxDOT expects us to foot the bill for this project on their behalf? Tell me they don't respect the people of El Paso, without telling me they don't respect the people of El Paso.</p> <p>There have been countless studies that prove induced demand is the only real result to be had from this venture. A mere few months after completion, the lanes will return to a pace that TxDOT will deem "unacceptable" except there will be more cars, causing more pollution, doing more damage to those around the area, and then what? We spend more money and displace more of our people?</p> <p>I will not have this. The City of El Paso, will not have this.</p> <p>I urge you, members of the MPO, to vote against approving this project. It is not in the best interest of El Paso. There is no return on investment for the people of El Paso. I hope you will make the choice for the good of the people of El Paso.</p> <p>Thank you.</p> <p>Respectfully, Richard Genera</p>	<p>Read at meeting [Received via email from Richard Genera]</p>	<p>The project described in this comment (Downtown 10 Executive Center to SL487COPIA Segment 2) is included in the MTP Project List with a projected Year of Expenditure of 2027; however, a preferred alternative has not been finalized as of the date of this response. El Paso MPO staff encourages the commenter and all concerned members of the public to participate in the ongoing project development activities being undertaken by the project sponsor, the El Paso District Office of the Texas Department of Transportation.</p>
2:47:46 [8:32 AM, 2/18/2022]	<p>Let's stop wasting money on these mega highway projects, and start investing in making it easier for people to get around our community. Let's make it easier to walk, bike and take the bus. Most trips are short trips - but the message our transportation planning system keeps sharing is you need to get there fast - so drive (and drive on the freeway!) I find that from the upper valley, I can get anywhere in the city in 30 minutes using surface streets. Most of them need repairs, though. Let's reroute the trucks through the Anthony Gap.</p> <p>Thank you, Kathy Anderson</p>	<p>Read at meeting [Received via email from Kathy Anderson]</p>	<p>Thank you for your comment. The El Paso MPO staff recognizes the importance of active transportation alternatives. We will provide these comments to the Transportation Policy Board for their review and consideration.</p>

PUBLIC COMMENTS AND RESPONSES RECEIVED DURING TRANSPORTATION POLICY BOARD MEETING (FEBRUARY 18, 2022) FOR RMS 2050 MTP, RMS 2023-2026 TIP, AND TCR

Public Comment			
Time [Received]	Comment	Speaker [Email]	MPO Response
2:50:50 [8:33 AM, 2/18/2022]	<p>I am deeply concerned with the proposed Downton [sic] 10 project. My list of concerns are long but I'll highlight just a few:</p> <p>Adding more lanes has shown not been effective [sic] in alleviating congestion. No matter how wide we make I-10, adding capacity only encourages more driving and discourages people from walking, cycling or using transit.</p> <p>The MPO didn't do any outreach. The plan documents are a combined 350+ pages long and available only in English in a community where, according to the U.S. Census Bureau, 70% of residents speak a language other than English at home.</p> <p>Please extend the public comment period and pivot away from widening I-10 to alternative solutions that will result [sic] in connectivity through the use of walking, bicycling and using other transit.</p>	Read at meeting [Received via email from Veronica Carrillo]	<p>The project described in this comment (Downtown 10 Executive Center to SL487COPIA Segment 2) is included in the MTP Project List is a Year of Expenditure of 2027; however, a preferred alternative has not been finalized as of the date of this response. El Paso MPO staff encourages the commenter and all concerned members of the public to participate in the ongoing project development activities being undertaken by the project sponsor, the El Paso District Office of the Texas Department of Transportation.</p> <p>El Paso MPO is committed to engaging the public in the plan development and decision making processes. The Public Participation Plan (https://www.elpasompo.org/PublicParticipationPlan) describes the standards that MPO staff follow when conducting formal public comment periods. Chapter 7 of the draft MTP provides a summary of the public involvement process for the RMS 2050 documents, which included visioning workshops that were open to the public, as well as on demand planning exercises accessible via the MPO website. As part of the outreach efforts, recordings of the presentations were provided in both English and Spanish accessible via the El Paso MPO website.</p> <p>El Paso MPO has now extended the public comment period from 30 days to 45 days, and announced this extension on the MPO website and social media accounts, as well as through email notifications to regional entities and the general MPO mailing list.</p>
[12:43 PM, 2/18/2022]	<p>Good morning, I'm Bob Storch. I live in Sunset Heights.</p> <p>Late last year, the El Paso County Commissioners Court hired a traffic consultant to provide an independent analysis of the Downtown 10 highway widening project. Yesterday they received that draft report.</p> <p>The report from Smart Mobility, questions the veracity of the TxDOT traffic studies. It also raised a question of the MPO's transparency. Apparently, the MPO refuses to provide the county's consultant with available, 2050 traffic modeling data.</p> <p>This is not "top secret" security data, or data that is incomplete. It is data gathered by public entities, to prepare public documents, about public projects. Public documents you are asking the public to comment on right now.</p> <p>Commissioners Court requested this independent review of a major public works project to provide themselves, and the public, with more information. The MPO's refusal to provide information, to a professional, to enlighten the public, indicates a lack of cooperation I find disturbing.</p> <p>The MPO staff spent two and a half years developing the draft MTP, TIP and Transportation Conformity Reports. Reports totaling hundreds of pages of technical details. With little explanation, and even less public awareness, you provide a minimal, 30-day public comment period.</p> <p>It further came to light at yesterday's commissioners court meeting that TxDOT was not forthcoming with information to the County's constant either. Necessary data from TxDOT had to be obtained through the Freedom of Information Act.</p> <p>Commissioners court is asking the MPO to extend the current public comment period and release the 2050 traffic modeling data to their independent consultant.</p> <p>I am making the same requests.</p> <p>The failure of the MPO to provide the data makes it look like you have something to hide. The minimal 30-day public comment period, with little roll-out, makes it look like you really don't want to hear from the public.</p> <p>If you seriously want to engage the public on these major projects that will affect our urban environment for the next 50 years, you must provide the data and extend the comment period.</p> <p>Thank you</p>	[Received via email from Bob Storch]	<p>El Paso MPO staff looks forward to receiving the final report from the consultant contracted by El Paso County and using it to inform continuing discussions on both the specific project mentioned by the commenter (Downtown 10 Executive Center to SL487COPIA Segment 2) and priorities for the regional transportation network as a whole. El Paso MPO staff encourages the commenter and all concerned members of the public to participate in the ongoing project development activities being undertaken by the project sponsor, the El Paso District Office of the Texas Department of Transportation.</p> <p>MPO staff provided El Paso County's consultant with all data and documentation associated with the currently approved transportation demand model for the region upon request.</p> <p>El Paso MPO has now extended the public comment period from 30 days to 45 days, and announced this extension on the MPO website and social media accounts, as well as through email notifications to regional entities and the general MPO mailing list.</p>

PUBLIC COMMENTS AND RESPONSES RECEIVED DURING TRANSPORTATION POLICY BOARD MEETING (FEBRUARY 18, 2022) FOR RMS 2050 MTP, RMS 2023-2026 TIP, AND TCR

Public Comment			
Time [Received]	Comment	Speaker [Email]	MPO Response
2:33:23	<p>My name is Peggy Hinkle. I grew up in El Paso. I left in 1973 when I graduated from Burgess. I moved back in January of 2017. For thirty-five of those years, I lived in the San Francisco Bay area. I saw firsthand the lie that advocates of freeways and wider freeways always tell us: more lanes will reduce traffic. That never happens and that is true all over this state and all over the country. More lanes equals more traffic equals more pollution. When I was a child my father lived in Los Angeles. Even that long ago, a long time ago, the L.A. freeways were already parking lots and that continues. This proposal to widen I-10 between Copia and Executive is a terrible plan as the independent analyst hired by the County Commissioners found. We share the air with Juarez, there is no way around it. It is incumbent on us to do everything we can on our side to reduce emissions and pollution here in the El Paso area. Many, many of our residents already suffer poor health due to pollution. The American Lung Association says that El Paso is thirteenth in ozone pollution. They term this a sunburn for the lungs. Study after study has shown poor health outcomes for those who live near freeways including asthma, strokes, heart attacks, etcetera. USC in Los Angeles has published many of these studies. We are also a medically under-served community. I am certain that many of you have at least one of these health problems and if not you, someone in your family does. We must prioritize public transportation and push TCEQ to push for lower emissions versus their ridiculous statement that there is no point to reduce emissions because we have no control over Juarez. Wider freeways only push induced demand, more cars on the road is the result. We can instead push induced demand for public transportation. If we offer more bus service, especially express buses at the times that residents need service, they will start to ride the bus, and also to depend on it. If filled, each bus could potentially remove up to 50 cars from the roads. My husband rode the bus across the bay bridge every workday for thirty years. Google, Facebook, Apple, and other corporations offer wired buses all over the bay so that employees can work as they commute. I don't know if we need that in El Paso, but it is something that exists elsewhere. This committee, MPO, I believe it is your responsibility to release the data the independent analyst needs. There, evidently there is no rule or law regulation that that data cannot be released. And I believe it is also your responsibility to consider the [the speaker's allotted 3 minutes for public comment concluded].</p>	Peggy Hinkle	<p>El Paso MPO staff looks forward to receiving the final report from the consultant contracted by El Paso County and using it to inform continuing discussions on both the specific project mentioned by the commenter (Downtown 10 Executive Center to SL487COPIA Segment 2) and priorities for the regional transportation network as a whole. El Paso MPO staff encourages the commenter and all concerned members of the public to participate in the ongoing project development activities being undertaken by the project sponsor, the El Paso District Office of the Texas Department of Transportation.</p> <p>The MPO must demonstrate that the future transportation network incorporating the RMS 2050 MTP projects will contribute to improvements in regional air quality. The details of this demonstration are described in the RMS 2050 Transportation Conformity Report. While the conformity report indicates that regional air quality would be improved by implementation of the RMS 2050 MTP projects, project-level conformity is not determined in conjunction with adoption of the project list.</p>
2:36:36	More concrete equals more heat, and more pollution. Thank you.	Peggy Hinkle	
2:37:15	Can you hear me? Alright let me know when the clock starts.	Kenneth Bell	
2:37:23	<p>Alright cool. So first of all, thank you all for holding this MPO meeting open public comment. I just want to say that I think it's a mistake to support this I-10 widening project. Yesterday at Commissioner's Court mister Norm Marshall, the independent consultant released, gave a great presentation and report basically stated that this I-10 widening project is neither feasible nor is it responsible. It does not address issues of congestion or even where congestion is most likely to occur. Its going to be on the westside near the mountain or eastside, but this project is focused on the central area where there's not as, the congestion doesn't exist. And TXDOT's information is based on an outdated algorithm, outdated system, the 2045 model, when we have a new 2050 model that's updated. And, but also historically there's no proof to show that highway widening even works. For example, Katy Highway in Houston has twenty-six lanes and since they built it ten years ago, commute times have increased by thirty percent so now it takes even longer for people to get from point A to point B even though there's more lanes. There's no proof that widening freeways has ever reduced, significantly reduced commute times for anyone. Not only that, you're basically just shepherding us to use the highways which is again going to cause more CO2 emissions, more environmental damage to our city when we're already in a non-feasible state because of the air pollution. This is just contributing to air pollution. It does, from an environmental standpoint, its absolutely terrible regardless of people claiming that this deck park is going to be a green space. Yeah, the pretend grass is going to be colored green but that doesn't make it environmentally friendly. Not to mention the price tag which also have not figured out how you're going to pay for this because TXDOT is basically putting it on us, to keep it real. I want to thank Commission Holguin for voting against this I-10 widening project consistently and I hope you will, the rest of you, will follow her lead on that. Thank you.</p>	Kenneth Bell	<p>El Paso MPO staff looks forward to receiving the final report from the consultant contracted by El Paso County and using it to inform continuing discussions on both the specific project mentioned by the commenter (Downtown 10 Executive Center to SL487COPIA Segment 2) and priorities for the regional transportation network as a whole. El Paso MPO staff encourages the commenter and all concerned members of the public to participate in the ongoing project development activities being undertaken by the project sponsor, the El Paso District Office of the Texas Department of Transportation.</p>

PUBLIC COMMENTS AND RESPONSES RECEIVED DURING TRANSPORTATION POLICY BOARD MEETING (FEBRUARY 18, 2022) FOR RMS 2050 MTP, RMS 2023-2026 TIP, AND TCR

Public Comment			
Time [Received]	Comment	Speaker [Email]	MPO Response
2:44:02	Good morning. Can you hear me?	Scott White	<p>Conversations on the long-term goals of the regional transportation network have been an integral part of the development of the RMS 2050 MTP, as reflected in the summary of public involvement activities found in Chapter 7. These activities resulted in the receipt of input from elected officials throughout the region, major private-sector stakeholders, as well as the public at large. The input received is reflected in the MTP in a variety of ways, from the development and calibration of demographic projections, to the weighting of individual project prioritization criteria. While MPO staff has attempted to incorporate the information obtained through public involvement activities into the MTP document, they will work in the future to improve transparency and to make these incorporation efforts more evident. MPO staff will working on improving how information is provided to the public, including how individual projects aid our progress toward meeting federal performance measures for safety, air quality, and congestion relief. Increased transparency will not only allow the public to better understand and participate in the regional transportation planning process, but help transportation planning professionals and elected officials to consider regional goals at every stage of the project development process.</p>
2:44:05	<p>Ok, thank you. Good morning, members, Chairman, members of the MPO. I know you're going to hear various things about I-10 widening or this or that. I want to talk about one of the bigger issues I see in these documents, in the MTP, the TIP, and the Conformity Report. And that is, I don't see or cannot find or perhaps I'm just not reading it properly, but I don't see real definable, measurable goals to work towards that help us say what our vision, our policies, what our projects should be working towards in terms of what kind of transportation system do we need to meet the needs of this region and this community going forward into the future. We have references to transit, to multi-modal options, to better air quality, to all these different things, but how do we get there? As we look forward, we need that kind of vision to help us identify what the priorities need to be so that in the MTP, that is clearly laid out, in the TIP it, we can then look at the various projects that are listed there and be able to say how they do or do not help us meet those long-term goals, those priorities. I think I've said it many times before, but we need to set policies and you as the Policy Board should be setting those policies and those visions and say this is the future we envision for El Paso so that we, the public, can then say yes this is the future we want, or no this is not the future transportation we want. And Mr. Calvo, I've been thinking about something you've been saying several times in the past couple weeks about how the MPO cannot affect land use planning. But it strikes me that there in the room before you, are a lot of people who can. And this is why we need those, that vision and those goals so that we can align transportation and land use planning and so that these, they all work towards that long term common goal. And I think as long as that is not a part of these planning documents, we need to stop and take a step back and figure out how we can include that kind of vision, that kind of, those kind of goals, things that are demonstrably measurable as we move forward and work towards these goals.</p>	Scott White	
2:47:12	Thank you.	Scott White	
2:53:26	Hello.	Angel Ulloa	
2:53:29	<p>Hi. Yes sir. I'm here. Thank you for taking my comments. I just want to reiterate what most people have already said. The public is now being informed about what is going on and we are upset, angry, and a little let down, because we spent so much money on a study that proved what we were already saying. So, at this point we just want to know why there was a public comment opportunity when, we're not being heard. Essentially it just seems performative, but most of us have been on these meetings for months and some even years asking not to go forward with this. And I hope after today the MPO sees the way the people of El Paso feel about this project and take all of our comments into consideration going forward. All we ask for is better public transportation, safer sidewalks, and safer bike lanes please. Thank you.</p>	Angel Ulloa	<p>While the referenced project was originally added to the MTP project list in 2018 as part of the Destino 2045 MTP, and the project carries over to the proposed RMS 2050 MTP. El Paso MPO staff encourages the commenter and all concerned members of the public to participate in the ongoing project development activities being undertaken by the project sponsor, the El Paso District Office of the Texas Department of Transportation.</p>

**Transcripts of public comments received and responses provided during public involvement meetings for RMS 2050 MTP, RMS 2023-2026 TIP, and TCR
(February 3rd, 9th, 15th, and 21st, 2022)**

Recordings of public involvement meetings available upon request.

PUBLIC COMMENTS AND RESPONSES RECEIVED DURING PUBLIC MEETING (FEBRUARY 3, 2022) FOR RMS 2050 MTP, RMS 2023-2026 TIP, AND TCR

Public Comment		MPO Response	
Time	Comment	Time	Comment
19:42	Is this presentation on the website?		
	Sito Negron	19:47	Yes, its currently available on the website. Also, online presentation can be accessed.
19:56	But this specific powerpoint, which is very good, very helpful, is that on the?		Sonia
	Sito Negron	20:01	Yes.
20:02	Cool, thanks.		Sonia
	Sito Negron	20:04	There's a version in Spanish as well.
		20:07	Do we want to show how to access it? (Demonstration given on how to access presentation).
		20:43	Its not cooperating?
		21:09	Can you go back? When you open the webpage for El Paso MPO at the "Get Involved", but also at the top it's passing through that announcement, you can click there, and it will take you to the same page and for the online video for presentation. And at the bottom you can go to the Spanish one will be right there.
			Sonia
25:34	Is 404 in the TIP?		
	Bob Storch	25:39	Which 404?
25:42	New Mexico 404?		Gaby
	Bob Storch	25:43	Oh, the New Mexico 404 widening?
25:44	Yes.		Gaby
	Bob Storch	25:45	Yes, that is correct. That is part of, I believe. And you know what, I stand corrected, its not in the TIP because the New Mexico 404 is actually programmed in fiscal year 2022 if I'm not mistaken. So since this starts in 2023, I believe its not included.
26:06	Its in 2023?		Gaby
	Bob Storch	26:07	2022. So the TIP covers the fiscal years 2023 to 2026. NM 404 widening is currently in 2022, but NM 213 widening.
26:20	Its in the current one. And is that the same with I-10 from Mesa to the State line?		Gaby
	Bob Storch	26:25	Correct.
26:26	Because they are not highlighted on the		Gaby
	Bob Storch	26:27	Correct. Yes, so those are fiscal years 2022 projects so they would not be identified in the maps shown on the screen.
26:34	Ok. Well, what happened with I-10 because the TTC did not let the contract so is it back on the drawing board? Is it going to have to go back in this TIP or does it stay in 2022, and get carried.		
	Bob Storch	26:50	Stays in 2022. Its actually letting tomorrow.
26:52	Oh they redid it and got new bids?		Eduardo
	Bob Storch	26:59	Right.
26:59	Oh ok.		Eduardo
	Bob Storch	27:00	That's happening tomorrow.
27:02	Ok.		Eduardo
	Bob Storch		
27:05	What was the, sorry, to follow up on that, what was the, how did they resolve that to allow them to let? Did they, did the TTC give us more money to complete it, or the project changed or what?		
	Sito Negron	27:28	I think the. Any specific questions on the project I think better if you direct them to TXDOT. What we know is that the project is letting again. That was a commitment that commission made to the community in general so our understanding is that there are no additional funds but the project lets tomorrow. So any specifics on if there were any changes to the scope and all that, I think its better if you ask TXDOT specifically on that.
			Eduardo
32:05	Where is the input, the data that you input into this come from?		
	Sito Negron	32:12	Ok. Probably the proposed, he can probably tell me in Teams, but we make some research to put the demographics for the forecast coming years. Also for the 2017, we take the database already done for this and we input also the description that we have for the projects for the forecast years are included in the MTP and TIP.
		32:40	For the emissions, values and traffic.
		32:46	Yes, when we run all our TDM when we already have our demographics and the projects modeled, we run the, it's the program called TransCAD, then we have the outputs of all the flows that are going to have in the forecast years and taking in consideration the flows or the traffic that you have in this year and the emission rates. This considering which kinds of vehicles we have right now and also the concentration of the gasoline and what is going to be the gasolines in the future, so that is called the, I forget what, the emissions range that they have, TTI. The TTI is the one they develop for us all the emissions if that makes sense.
			Claudia
33:39	Did UTEP, I know you all had some contracts over the last few years with UTEP for various air modeling or measuring, or something. I'm not exactly sure what they were for but that UTEP had some role, so is it UTEP working with TTI to develop the inputs that TTI. Like does TTI create the model and then UTEP produces inputs that go into the model? Or?		
	Sito Negron	34:04	Well, the model that is used for estimating emissions, thats the model that is used. Its approved by the federal government and EPA and all that. its called the MOVES model. So I think just to, without getting into all the gory details, the MOVES model uses output from the travel demand model, right, from the, as far as speeds, and vehicle miles of travel, vehicle hours of travel, and all that, so that's the main component of the inputs to the MOVES model, the output from the travel demand model. But at the same time theres the model considers a lot of other things that effect the emissions of pollutants. Temperatures, vehicle fleet, season of the year. You'll see in the some of the tables that we have emissions for winter or for summer. So the MOVES model is very sophisticated and it uses a lot of different inputs. So I guess I don't know if that answers your questions. Oh and TTI really does all of the, runs the emissions model for I think most of, if not all of the non-attainment areas in Texas. Now UTEP has helped us with other research projects and all that but I'm not aware that they are doing anything that directly inputs.
		35:40	No, they make another research for us but like for example, another kind of program for emissions modeling but not specific for inputs for transportation conformity report.
		35:52	Yeah, UTEP is helping us a lot on other types of inventory and is actually helping us also you know collect data to update the congestion management process and all that.
			Claudia
36:06	And where does the actual data come into the process like the EPA monitor or whatever TCEQ monitors in the immediate area. Just whatever actual data exists, where does that come into this?		
	Sito Negron	36:20	So what the monitors do is that they measure current emissions. So that tells us how well we are doing or not. So they measure the amount of pollutants today. So you know, and that data is used to establish if we are doing well as a non-attainment area. In other words, are we moving towards attainment. In other words are the level of emissions really improving, which is what we all want to see. But the monitors again they collect data today. And that somehow is used to estimate the budgets or the maximum for the future years which is what Claudia was describing as you know what the emissions the MOVES model calculate the emissions in future years. The whole idea is that those emissions are below the budgets which are the ceiling, the maximum.
			Eduardo
37:26	So the data derived from those monitors, is it baseline? And is it also one of the inputs into the MOVES model to say like this is the current situation, we estimate that'll be like this, like you said, these different types of vehicles or vehicles will get more efficient or will go to electric? And all the different criteria, that actual data becomes the baseline to attribute like x amount is vehicles and then we estimate that that vehicle fleet will change in this way. X amount is the temperature and we estimate and so, but the data the existing data becomes part, an input into the model? I mean is that accurate, fair?		
	Sito Negron	38:13	Yes, I mean but what the models do is that they estimate, just like we do with the travel demand model. We validate the model to existing conditions to see what we compare with the model, what the model does and we compare to existing conditions with traffic counts and all that. So, I'm not sure if the MOVES model is also validated against existing conditions. I'm not really sure of that, but again the MOVES model is what every non-attainment region in the Country uses.
		38:52	If I may add to that. Can you hear me? Yes, just to point a couple of things. The monitors actually cannot measure all of the emissions for the region. Ok, so we need to be clear of that. These are like samples that there. The monitors are located in strategic places in El Paso but its only a sample. So if I can simplify what is being done is when those monitors detect that some of the standards have been breached, if you may, what the emissions modelers try to do is using for that same year, using the emissions model they try to come up with a budget, ok. The idea is not to go over that budget, but that's sort of like the calibration if you may of the emission model but its important to understand that the monitors don't actually get the emissions for the entire region. Its an estimate that is calibrated, or if you may, proportionally established based on the monitors.
			Eduardo
			Dr. Sal

PUBLIC COMMENTS AND RESPONSES RECEIVED DURING PUBLIC MEETING (FEBRUARY 3, 2022) FOR RMS 2050 MTP, RMS 2023-2026 TIP, AND TCR

Public Comment		MPO Response	
Time	Comment	Time	Comment
		40:31	And also something to mention is that the resource catch everything like for example for PM10. The monitor catch all the environment, and we have a lot of dust. But when you run your MOVES, or MOVES the one that we are having budgets, you only evaluate the emissions that we are creating with the MOVES with state plan.
40:56	Yeah I was actually going to say that. In a way you'll have a budget. There isn't a budget for like the electric company or for marathon or for other major sources, right? There is no like overall budget for the community and so they'll try to be within a budget with your only percentage of it. So if one of those other industries starts, has an event or something like that, increases the amount of pollution, its not attributable to you, but you're the only ones that actually have to fit within a budget.		Sito Negron
		41:38	And you're right. What Salvador was bringing up is correct. The monitors, to your point, the monitors detect the amount of pollutants. The monitors really don't care if they came from mobile sources, which is really what the piece that we have to deal with. Point sources like refineries or power.
42:05	Not to pick on them but they are just the most well-known.		Sito Negron
		42:08	Exactly right. So, but there is a process where EPA and TCEQ assign the. We know that we're responsible, well not we, mobile sources, which are cars and trucks, are responsible for about 50%. You were at that presentation right where the gentleman from TCEQ spoke last week. And again mobile sources are responsible for about 50% of emissions for ozone. So we are responsible for a good chunk of it, not all of it.
44:39	Could somebody explain a little bit more about how that no build analysis works?		Bob Storch
		44:48	Well, the no build is relatively simple. Its essentially, that analysis is of the current roadway network as if we were doing no projects in the future. So all of the projects that are included in the MTP as if they were not going to happen at all. In 2050 that's what the network would look like.
45:17	So you just multiply like the increase from one year to the next and then just double it out?		Bob Storch
		45:25	Well we're taking the demographic projection for 2050 and from that we're deriving estimates for trends, and VMT and things like that. And then we're essentially looking at if all of that happened, those projects were true out to 2050, but no projects were done to mitigate or change the network in any way.
45:55	Ok, so like for I-10 you have the numbers of cars that are there now and the number of cars that were there last year, or two years or whatever. And so you figure if we don't do anything that based on the population increase, that's just going to add up and you're just, like if the population doubles, then the traffic will double?		Bob Storch
		46:29	Well I don't think its necessarily a one to one like that. But that's the essential, yeah.
		46:34	And typically the no build scenario, you know its not a likely scenario. Assuming that the growth in population and employment and all that happens through 2050 without projects. But it's a useful tool, or a useful element, to compare build scenarios or action scenarios. So you have a baseline, if you do nothing this happens. Well if you do scenario one, this is how it improves the no build. If you do scenario two, this is what it does to improve the no build. So the no build by itself is not a realistic scenario. I mean of course we are going to do something between now and 2050.
47:26	And if nothings done, something else is going to happen.		Bob Storch
		47:29	Exactly right
47:32	Ok, so its really not.		Bob Storch
		47:34	Right, but it's a useful way to compare scenarios. It sort of like provides a baseline. And then you compare against the no build how different scenarios perform.
47:49	Ok		Bob Storch
47:50	What's the growth rate that you used in the demographic analysis?		Sito Negron
		48:00	Dr. Sal?
		48:04	Sal do you want to answer that?
		48:06	If I remember well, the average annual growth rate is, its about 1%, ok. And this comes from the Texas Demographic Center. This is something that the MPO doesn't actually come up with. This is something that experts at the Texas Demographic Center study. They are the, that's what they do basically. And they provide the control totals for the different years or forecast years ok. But its about that, its about close to 1%. But, you need to understand that we are, this is compound growth rate and we are estimating growth all the way to year 2050 ok.
49:03	Right, understood. And even Eduardo brought this up before, right, even if that growth rate doesn't seem extremely high, the patterns of growth are creating the need for connections to far flung parts of the county. So even if the actual number of people was huge, where they are is still providing some of that, those projections.		Sito Negron
49:41	It seems like there's a disconnect between the travel demand model and the four elements or four strategies. I missed two of them. One was increase occupancy, another one was land use, I missed the other two. But they seem to be geared towards increasing our ability to use the existing capacity. And so, but then with no build, we get the projection of more intense congestion. But, that seems to be a bit of a disconnect, right? Like so do you plug in, lets say we didn't build anything more but we successfully increased capacity? Or with smart vehicles, or increase occupancy, or with smart vehicles we're able to queue more efficiently use the space? So do we have a scenario where there's a no build but we still use the TDM strategies to increase the efficiency of the existing capacity?		Sito Negron
		50:54	If I may try to answer that one. As I explained in Chapter 4 we actually talked about travel demand management strategies, which are strategies that are alternatives to actually building additional roadway capacity, additional roads or adding lanes. But that's an issue that has to do with decisions by people of using those alternative options, ok. Our model is sensitive to that, to the choice that people make. And that choice that people make for, to give an example, use transit versus using your car has to do with how comfortable, how efficient is one option versus the other. And what we've been, at this point, what we've seen from travel surveys and from other tools that we use to measure the mode shares, is that still the overall availability of roadway capacity is making people like more the use of automobiles. So there's no disconnect, believe me. The thing is that we need to provide better alternatives to automobiles if we are to move from the automobile, and not only that, but single occupancy automobile use. That's one element. The other element of course is where the population and employment will be located in the future, that's what actually drives congestion and flows on our system, ok. So those are challenges that we're of course researching and studying and trying to really provide for other options, better alternatives.
53:20	Along those lines, one more comment, along those lines, you reference Chapter 4 for example, I haven't read Chapter 4, so and this is going to take a long time to be able to get through all those documents. Right, there's like over a thousand pages of documents I think, or there's a number of documents, very technical. So I hope that you all will consider extending the public comment period because this is just a brief introduction and its going to take a lot of time, if we really want to understand that, its going to take a lot of time to go through these documents. So I'm asking that you all consider extending the public comment.		Sito Negron
		54:02	Alright well we'll take that comment into consideration.
58:15	Arturo, or Eduardo. Is the Artcraft in the TIP or is it only in the MTP?		Bob Storch
		58:25	The Artcraft will be in the new TIP. And I think we programmed also the current TIP cause its in fiscal year 23.
		58:35	Yes, it's in both. The current and then the new TIP.
		58:40	So it will be. Its not yet because, well there were some technicalities. I mean it was included in there, but its not approved yet, some minor things.
58:50	Ok, and then the border, there's phase one of the borderland expressway is in the current TIP or in the draft TIP?		Bob Storch
		59:06	It has been submitted in the current TIP for approval by FHWA, but it is also anticipated to be submitted in the new TIP when that's submitted. So, same thing, it's in fiscal year 2023 so it would be covered by both TIPs.
59:21	Ok, and it's the access roads between Railroad and Dyer?		Bob Storch
		59:25	Correct.
59:26	Not the main road?		Bob Storch
		59:27	Correct.

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Time (Chat Entry)	Comment	Speaker (Chat Entry)	Time	Comment	Speaker
~22:00 [11:26 AM]	Why are we using maps that show percentage of growth, which will always show highest growth percentage in the fringes	Scott White (Guest)			
			22:13	Salvador do you want to take that or Harrison?	Eduardo
			22:17	Yeah, I'll speak to that. And Scott, that's a good question. And that's actually a question that I had when I started. You know I've only been at the MPO here for about a year and so a lot of the work on this document was done before I got here and so that was a good opportunity for me to come in with kind of a new perspective and ask questions like that. And that was also a question that I had. You know why are we just showing the percentage change because yeah, you look at that map on the left and that makes it, if you're not paying attention to what the numbers mean, it looks like all the population is going to the edges of the county, the edges of the region. And so that's why we created the maps on the right as well to show the actual density and I think they balance each other out. On the left you're seeing where the majority of the growth is expected to happen and we can't get around the fact that, that is going to be on the edges. But you look on the right and you can see that, ok yes the growth is happening on the edges but people still live for the most part in the areas of the region that are already heavily populated, they're already developed. And that's central El Paso and the near east side of El Paso, the northeast. So hopefully the two maps help to contextualize that data a little bit better than just having the percentage change would.	Harrison
			24:13	And if I may add a couple of things. Yes, this is actually a phenomena that actually is putting a lot of stress into our transportation system. This is sprawl. And this map is of course what we expect to see in 2050. Or, and let me just say briefly that the actual location of population and employment is something that we really don't control as MPO. But there are policies that could be, if we all agree that this is probably not a good idea that is stressing out our transportation system, then we need to provide policy that would incentivize less of this sprawl. The maps that you are looking at are the result of a Delphi process for the location of demographics in the future. And this Delphi process, what it is, is a consensus building procedure where different stakeholders in our community, universities, TXDOT, New Mexico DOT, of course developers, people that have stake on our community go through an exercise looking at constraints, looking at opportunities and suggesting where the, that growth might take place. It's a process that took us almost six months of, and we of course include experts on the demographic arena. We have the Texas Demographic Center providing control totals and again go through the process, understanding land use, the current land use, and the planning and the zoning in the future. That as a result and from this consensus, this is what we got. I guess, again I need to stress the fact that the MPO doesn't control that, but as a community we can sit down and come up with policy that can reduce this type of phenomena and behavior.	Dr. Sal
~25:00 [11:29 AM]	So why aren't we focusing on where people and jobs are now? By changing policies and priorities, we can encourage infill vs. sprawl.	Scott White (Guest)			
~26:00 [11:30 AM]	But the implication is we need to spend on the fringes, rather than investing on the core of our communities?	Scott White (Guest)			
~27:00 [11:31 AM]	As a visioning process, shouldn't we be able to say where we want to focus our transportation dollars - and not on subsidizing sprawl	Scott White (Guest)			
~28:00 [11:32 AM]	So let's set goals that focus on reducing sprawl - and the TPB can set those goals - and they are part of the bodies that do make those decisions	Scott White (Guest)			
~30:00 [11:34 AM]	And that means setting goals to change how well plan our transportation needs - mode shift, more transit - walkability	Scott White (Guest)			
~31:00 [11:35 AM]	And changing the tools whereby we model our transportation needs to focus on moving people v vehicles	Scott White (Guest)			
			27:08	Yeah, I think Scott, you're bringing up good points and I don't think anybody, well I don't think as an MPO once we look at, at the results of this plan and all that I don't think we like them necessarily. The trends, which is something that we have to follow when we come up with what is the most likely scenario based on trends. Well it's something that we all know is happening and we don't necessarily like it. But there's nothing right now at this point which is part of the problem that indicates that the trends are going to change. Like Salvador said as an MPO we do not control land use. Land use is more driven by market forces. Developers are going to build where conditions are better for them. And it's up to the local governments to have some controls over land use through zoning. So its one of the challenges that we've had as transportation people forever. We feel like we're chasing the rabbit instead of taking more of a proactive role in making the urban patterns a little more efficient. But that is a discussion that needs to happen. Now when we developed also our project list for the MTP, we were focusing on some of the short term needs first. So where we see congestion today, well that's obviously, its one of the factors that we need to take into consideration when selecting projects. Now the congestion that we see out in the future, in 2050, well I think we all have, we should look at it as an opportunity to do whatever we can so that that doesn't happen. But its part of the visioning process and that doesn't stop today you know with this MTP. It's something that will continue or should continue almost every day that is part of our process.	Eduardo
			29:43	And looking at some other things that Mr. White is writing here on the chat, I think it's a good idea to open this discussion with the TPB again. The actual MPO little power on this other than perhaps opening the discussion. I think this is a very good idea. And since we have in our policy board representatives from the different local governments where you can actually set policy for land use. I think there's the place, that it's a good place to start the discussion and see what options there are. What are perhaps successful stories in other places about how to reduce sprawl and with that how to reduce VMT, congestion, and improve air quality. So I think that's a good point.	Dr. Sal
			31:12	But again, the discussion is something that needs to happen. We play a role in generating the discussion, but obviously we're not the only ones that can make decisions on land use, but I think it is very important that we start that discussion more seriously.	Eduardo
~35:00 [11:39 AM]	How do these projects address the communities desire for safety and increased access to transit? Project applications (or the lists of projects) don't show us how these projects help us meet these publicly stated needs?	Scott White (Guest)			
~36:00 [11:40 AM]	Shouldn't every project justify how we meet those goals?	Scott White (Guest)			
~38:00 [11:42 AM]	The local government priorities are not necessarily what the public wants? As total budgets show a focus on capacity, over safety and transit	Scott White (Guest)			
~39:00 [11:43 AM]	Ah federal guidance - isn't that changing dramatically right now?	Scott White (Guest)			
			36:18	Yeah, so I'm trying to understand the question. So I mean, clearly the TIP has, and the MTP for that matter, they do reflect the desires of the local governments, of the local communities. They are the ones, obviously we're very open and respectful of what the local governments identify as priorities. So part of the transit projects do include what the communities identify as desires. I'm thinking for example, with the County of El Paso the rural transit service that the county jump-started, well is beginning very soon, this fiscal year. Well the MPO provided some funding to help them jump-start the service. And we've done the same thing for Sun Metro as well. So yeah, I mean the project lists do include some of the desires, the priorities of the communities regarding transit. So I don't know if you want to add anything else to that Harrison or Sonia, Salvador?	Eduardo
			37:49	I guess I would say that we, we're obligated and always cognizant in thinking about the federal performance measures that we're required to follow and meet and strive toward. And one of those is safety. And so we have metrics that we're required to follow and if projects are not meeting or contributing to improvements in those metrics, then we can't program them. So, it's intended to be built-in right from the ground level of everything that the MPO does and our ability to take guidance and evaluate projects from the local governments.	Harrison
			39:05	Right, and that's the whole purpose, and this is a very involved process. I might just, to simplify, but that's the needs assessment. We tried to see into the future. If we do nothing, how would this impact many performance indicators so that, we show that to the different stakeholders, the different local governments, the TXDOT, New Mexico DOT, and through this consensus building, projects start to come up and we try to fill those gaps in different, in the different performance measures.	Dr. Sal

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Time (Chat Entry)	Comment	Speaker (Chat Entry)	Time	Comment	Speaker
~44:00 [11:48 AM]	Again, the project list does not indicate how air quality is improved, or by how much - would not that be valuable data to show how each project addresses conformity?	Scott White (Guest)	44:13	The, that's kind of the purpose of the conformity report. It is indicating that the projects collectively are within the budgets that are set by the states and that we conform. That we are meeting or expect to be meeting Clean Air Act guidance and getting ourselves, that the projects are helping us get closer to attainment.	Harrison
~49:00 [11:53 AM]	Collectively - but how about individually??? If a community has concerns about the impacts on air quality of a project - could they be harmed, even as overall air quality is improved?	Scott White (Guest)	49:25	Well, so yeah we deal with conformity, Scott, at two levels. One level is at the regional level which is pretty much the, our biggest responsibility. To make sure that all of our, that collectively the plan moves towards improving air quality, reducing emissions so that we can reach those targets, those goals for each of the pollutants. And that's the whole purpose of the conformity process, so we're doing well as was shown by Claudia. The second way of showing or dealing with conformity is at the project level. So there are some, depending on the pollutant, there are some additional tests that have to do with conformity at the project level, such as PM10. I think PM10 is the one that has the most, how can I call it, I don't want to say onerous, but it's a process where the traffic numbers and projections need to show that the emissions for PM10 are not going to be increasing because of the project. So we look very specifically at PM10 on diesel engines, so basically its trucks. And so at the project level, yes we do have to look at what individual projects do as far as conformity.	Eduardo
~51:00 [11:55 AM]	And that's what we the public need to be able to see on these lists	Scott White (Guest)			
~55:00 [11:59 AM]	Hello, just a question in regards to public comments once public comment period closes. Is a document gathering public comment developed and shared?	Thelma Ramirez (Guest)	55:03	Yes. So we will be, all of the comments that are put in this chat or we receive any other way, they all get entered into a matrix and we have a written response in there and also an indication of what we modified within the document if modifications were needed as a result in order to address the comment. And so that what will be included as part of the final document.	Harrison
~56:00 [12:00 PM]	Thank you.	Thelma Ramirez (Guest)			
~57:00 [12:01 PM]	As for safety - as that was listed as a primary public concern - how will these projects make us safer? I believe it's time we look to do more than provide the minimum required information, but that these plans should show how we are working to improve safety, air quality, increase transit and on and on. It's important that we see these are factors in the process, but do the project lists bear that need out? If that data is not available to us, how can we evaluate the benefit of these projects individually, or as a whole? And by showing the goals for the project and plan, we can go back and measure how effective that project was in moving us to our overriding goals.	Scott White (Guest)	1:03:52	Yeah, a lot of this, Scott, well it's a, you've got several questions in there. I think the first is that, yes, there are multiple criteria that we all need to consider when selecting projects and implementing so it's, yes it's safety, it's environmental concerns, including air quality. It's congestion relief but it's also economic development and all that. So, it's not an easy process, its not that simple. However, I think your point is very well taken in that there's been a push in recent years to be more focused on data. And make sure that decisions are made more on data, and it's a whole thing about performance-based planning and programming. We have our, we're making progress there. We've got on a dashboard where we are putting out, and its available to the general public, where we have information about, safety, statistics, and all that. The second part regarding the performance of projects. As part of the CMP and maybe Sonia can jump in here and fill in some of the blanks, but the congestion management process require us to go back and look at how these projects are addressing congestion, specifically congestion. As an urban area of more than two hundred thousand people, we are required to have a congestion management process that we revamped, updated back in 2019 and we're now putting a lot more time and effort to, and resources to, update it consistently and continuously so that we can see the overall state and how projects are performing on helping us with that. Sonia, do you want to talk a little bit about the dashboard and the CMP?	Eduardo
(~59:00) [12:03 PM]	For example - if a project is designed to address capacity needs, but we end up with even greater congestion, could that not be used to tell us a lot about how well that project met its stated goal?	Scott White (Guest)			
~1:02:00 [12:06 PM]	So could we include data to show how much a project will benefit conformity, or how much it will reduce congestion, encourage mode shift, increase access to transit, etc. To encourage public engagement, we need data that tells us not just the project limits, or it's \$ costs, but how it will benefit us, and move us toward the stated goals? That same information would be helpful to TPAC and TPB members as they evaluate projects and plans.	Scott White (Guest)			
~1:04:00 [12:08 PM]	As was mentioned at the last TPAC meeting, projects have been designed for safety, but people are still dying. Isn't it time to reconsider how we approach issues of concern to ensure the public really can get what we've been asking for?	Scott White (Guest)			
			1:06:17	Well as part of the CMP, in 2019 the congested segments were identified based on a criteria developed. And as part of the RMS, the proposed projects were compared against those congested segments. And the ones that were along those congested segments or on alternate roadways that we saw by analyzing that they could help in reducing congestion were given points as part of the project selection process. So we did, we did do an analysis of the proposed projects in RMS looking into the criteria developed for the congestion management process. And also, we are developing a web tool. We're hoping to have it soon, available to everybody where we have different performance measures such as the fatalities, injuries, on safety, collisions with pedestrians. Also, the performance measures that are being required on pavement, bridges, the quality of pavement and bridges, and its about twenty, thirty performance measures that are going to be able, the public is going to be able to see in a map, interactively, identify project or roadways, that you want to be able to gather more statistics and these performance measures and this is the work that UTEP is helping us develop. We had, I guess a conflict with the information to be able to have it ready for the public because the servers of UTEP that were I guess, were not available for a time. But we're finalizing it hopefully by next month we'll be presenting to TPAC and TPB for everybody to access those. It's a multi-modal web tool.	Sonia
			1:08:49	Right, thank you Sonia.	Eduardo
			1:09:00	So Scott, you make a point about encourage more public engagement in terms of I guess the whole project selection and stuff like that, to move towards the stated goals. Yeah I mean it is important. I know that you're an advocate for multi-modal transportation and all that, and I don't think anybody here disagrees. But also, its also important to recognize that a lot of what happens in terms of the land use patterns. Like I said earlier, they're driven by market forces. And so yeah developers will build where they see fit, but at the same time there is demand for what they're building. So I think its not just that the supply is driving it. The demand is also, has something to do with that. As long as people are buying homes in the new subdivisions out on the fringes, well the developers will continue building them. Recognizing that not everybody wants to live in a high-density development. Not everybody wants to drive a bike to work. So it is a complicated process, but I'm totally in agreement with you that this discussion needs to be, we need to put more emphasis on bringing out these issues. And as Salvador I think briefly touched on earlier, we are developing some different scenarios that show different land use patterns, higher density corridors. What happens if we densify a certain corridors where public transportation becomes a lot more efficient in moving more people and trying to densify a little bit, and as a response to sprawl. So, a lot of that is what the MPO will begin engaging, and as we prepare for the next long-range plan which hopefully by then we'll have a little, a lot more of this public awareness that can help us, that we can give us a little bit of time to communicate all these concerns that we have now and try to maybe reverse some of the trends. Salvador, I don't know with that if you want to add anything?	Eduardo
			1:11:45	Well yeah, there's a detailed discussion on Chapter 4. I invite anybody, specifically Mr. Scott White to check, it's the last section. Its three or four pages in Chapter 4, we go into that analysis. Again, understanding that the MPO doesn't control land use. Nevertheless, we run this scenarios, this idealistic scenario in-which, what happens if we were, we would be able to increase density and provide all but the best transit, what would happen. We run through that and you should check that as well.	Dr. Sal

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			1:12:57	Well, on the question of safety, and I mean you're right Scott in the sense that I think there's a general frustration in that there's so much research, and so much money and time spent on research and on safety. A lot of it on the engineering side, how to make roadways and transportation in general safer. But, one of the things that we're seeing right now is that its not just the engineering side, its not just the project side. There are two very important elements when it comes to safety that are education and enforcement. It's when you see some of the, in the last year a lot of the fatalities that we've had, its difficult to engineer against drunk drivers. And we've seen a lot more incidents related to speed. During the pandemic, supposedly the traffic volumes came down so you would think well fewer cars on the street, less VMT, so less accidents. But yeah, there was maybe less accidents, but the severity of the accidents increased. In other words, the fatality rates are trending in the wrong direction. So a lot of that has to do with education and enforcement. And so the safety issue, and you're right, I mentioned it at TPAC and we are planning to come up with a, develop a regional committee, I mean a local committee. By local I mean here for our region as opposed to the statewide committee or task force to try to figure out what can we do. Yes there is a role for the implementation of projects and again the city, TXDOT, the county have done projects that address specifically safety. On the freeways you see a lot of the cable barrier that's been implemented on some of the higher speed facilities. But there's other things, safety lighting for example. When you have a lot of the fatalities involving pedestrians or people riding bicycles, could be safety, could be reducing speeds, not just on the freeways but on arterials. I mean it's a, it's not an easy problem, but I think there is a growing frustration, and I'll include myself in that group, that we have these very aspirational goals like zero, the road to zero, no fatalities in 2050. But its going to be difficult if we're trending in the wrong direction, right? So anyways, so that's trying to respond to your comment on safety, Scott. But we will be in touch shortly to see how we can come up with a local group and really think outside of the box in terms of solutions to at least reverse the trend.	Eduardo
1:16:36	And if you don't mind, I really appreciate that, and the reason for all my comments and my questions is not to say you all are doing a bad job, I don't believe that at all. I know how hard your work is. I just, I'm trying to push to get you all to see some things from a different perspective because when I try and get people fired up to go and talk about these kind of issues they say what's the purpose, they don't listen to us. And I know you do listen, but at the same time, sometimes what we're asking for and what you hear from us, we're talking across purposes. And so for all this, my biggest goal here is I see what's going on is almost reactionary because you don't have control over this, a lot of what this is. But the members of the TPB, they do. They are the members of the local governments and they, and I feel like for them they're going along with these plans, because well it's the plan and somewhere along the way, and you've heard me say this before, there's not this overarching goal that we need to lay out up front that this is what we want for this region and that the TPB members and the TPAC as they can, and your staff as they can, can help lay out some actual goals that we, we go after instead of just saying ok well this is what's going on and we need to respond to that. There needs to be a proactive side to this as well to say these are the goals for our region and this is why we think we need them. Whether its congestion, air quality, safety, walkability, bikeability, increase of transit, all those kind of things, there's so many things involved. The big issue becomes how do we effectively move people in this region safely, efficiently, comfortably, and to benefit the economy. And sometimes, especially with people who've been raised with thinking the only way to get around is a car, they don't have that other perspective that helps them see that if we do this, we can get a better outcome. And that's what I'm trying to, with all these questions and all the data and the performance-based measures, have we actually been doing all we can do to reshape the way the decision makers think to help them understand, to help them see that there may be a more effective approach. I hope that's what part of that is and I hope, because my work statewide working on safety and vision zero, I would love to be a part of whatever safety process that you're going to set up and hopefully add that outside perspective from the traditional perspective.	Scott W.			
			1:19:56	Will do. Thank you Scott.	Eduardo
1:20:00	So thank you so much. And I really appreciate what you guys are doing. Even if it sounds like we yelling at you, which is not what I intend.	Scott W.			
			1:20:08	That's alright though, we get it. Thank you.	Eduardo
1:20:11	Thank you.	Scott W.			
~1:16:00 [12:20 PM]	Safety for whom? Traffic engineers design roads to increase speed and capacity and protect vehicle drivers and passengers should they leave the roadways. What is done to protect pedestrians and cyclists?	Bob Storch (Guest)			
			1:20:44	Well what I'll say is, without getting into a lot of the design details and all that, but I think we can, we should be doing more in terms of protecting pedestrians and cyclists. I think TXDOT little by little, especially on the freeways, the higher speed facilities, they're beginning more, being more aware of that like on the frontage roads and all that. But, a lot of these incidents are not in the, not on the freeways involving pedestrians and cyclists obviously they're not riding bikes on the freeways. Its more on the arterials and some of the local roads.	Eduardo
~1:18:00 [12:22 PM]	Enforcement is not the answer. People will drive at speeds they feel comfortable. Roads should be designed to slow traffic.	Bob Storch (Guest)			
			1:21:33	Well, I respectfully disagree. I mean all of us, when we're driving on, whether it's freeways or an arterial and you're going over the speed limit and you see some flashing lights ahead of you, what do you do? You slow down, right? So I think enforcement does play a role. Now the problem is that all of our law enforcement agencies are also strapped for funding. We cannot have, whether its El Paso police department or the county Sheriff or other law enforcement every half mile on the freeways or just sitting there with their lights flashing to encourage people to slow down. I think enforcement is part of the solution. Its not the only solution but it is part of it. So anyways, Salvador you wanted to join in?	Eduardo
			1:22:36	Yeah, I just wanted to say that in terms of bicycle infrastructure and pedestrian infrastructure, the both TXDOT and the City of El Paso in particular have been making a lot of strides in design and proposing new projects. We have a large urban area and it seems, it might seem that its very little, but I would say that its, those are initiatives on the right direction and yeah I guess, the public needs to put, keep putting pressure so more of those projects are actually built. Yeah the design, actually that's something that the actual design for improving safety of bicycles and pedestrians it's something that we as MPO really don't have means to actually model that as we do congestion and speeds and all of that, but they do follow best practices and are really keen on providing the most secure infrastructure.	Dr. Sal
~1:25:00 [12:29 PM]	There is a thought that self enforcing design encourages people to drive slower/safer simply based on design features. As you said during the pandemic with less traffic, people drove faster (and angrier - and have continued to do so). Narrowed lanes, chicanes, street trees can actually slow traffic through the design. -- also, enforcement can also take the form of speed cameras - but the Lege doesn't like those. So in a way if we expand out approaches and thinking, maybe we can come up with better approaches to enforcement	Scott White (Guest)			
			1:25:55	Yeah, and I think those are the things that we need to look at as far as the, what else, what new things we can do in the case, specifically talking about safety and avoiding severe incidents. I mean to me what doesn't make any sense is that a lot of the, a good number of the fatalities are people not wearing seatbelts. I mean that something as simple as, as obvious as that. See folks riding motorcycles without helmets. Basic stuff like that is still happening, right. And it contributes to the number of fatalities. So, anyways, so go ahead Salvador.	Eduardo
			1:26:48	Well I just stress again that you probably need to check all the things that are being suggested here, including narrowed lanes, chicanes, street trees. You should take a look at, for example the bicycle plan and the things that the City of El Paso in particular is looking at. They are proposing all of that. And again it might seem that we don't have those, enough of those infrastructure projects already in, constructed but many of them are coming. Take a look at them.	Dr. Sal

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1:29:52	I have Salvador. In fact I helped, I was a part of creating the bicycle plan, and right now I've been a voice, I've been whispering in the ears of people across the community about vision zero for the, at least the past eight years. And these kind of things, so I'm aware of them I just don't see them appearing in the plans that keep coming before us. And that's why I'm really working to shift policies and right now I'm really, I'm very appreciative that the city is, has actually started, has hired a contractor to develop a vision zero action plan. And I know that's going to have a big impact, but and I've even talked to the county about maybe jumping on board with that process. And maybe the MPO should consider doing the same. That way, every one of the three large governments in the region are on board, on the same page and then if the MPO does it then that helps shape what the smaller municipalities are doing as well. And maybe then we can get TXDOT to recognize that some of their approaches, despite Commissioner Ryeahn's best efforts are still behind the times. And I know she means well, but we've still got people at TXDOT who were there when it was the department, when it was the highway department. And they have that old school mentality and we need to get that to change and I think that's why if we can get a regionwide vision zero, road to zero, whatever we want to call it, plan on board, that helps us all in terms of getting there and it helps make it easier to do some of these other things like talk about increased transit because we know reducing the number of vehicles on the road makes the road safer. And then we can rethink, and then what do we do with that extra capacity, turn it in to dedicated transit lanes. Fun stuff like that.	Scott W.			
			1:29:50	And we hear you Scott, we do.	Dr. Sal
1:29:52	And I know it is a long process, but I've seen the change and I'm really appreciative of the change I have seen. But yeah, just a little bit faster.	Scott W.			
			1:30:08	Thank you Scott.	Eduardo
1:30:11	And thank you all.	Scott W.			
*1:31:00 [12:35 PM]	Thanks everyone, I need to get on to my next meeting	Scott White (Guest)			

PUBLIC COMMENTS AND RESPONSES RECEIVED DURING PUBLIC MEETING (FEBRUARY 15, 2022) FOR RMS 2050 MTP, RMS 2023-2026 TIP, AND TCR

Public Comment			MPO Response		
Time [Chat Entry]	Comment	Speaker (Chat Entry)	Time [Chat Entry]	Comment	Speaker (Chat Entry)
~11:00 [3:10 PM]	will the presentation be available after this is over?	Franklin L. Stubbs LeBaron (Guest)	~12:00 [3:11 PM]	Yes, the presentations are available on our website www.elpasompo.org	Calvo, Eduardo R. (MPO)
			~13:00 [3:12 PM]	A recording of this presentation can be accessed here: https://www.elpasompo.org/RMS2050MTP	Plourde, Harrison T. (MPO)
~14:00 [3:13 PM]	thank you	Franklin L. Stubbs LeBaron (Guest)			
~14:00 [3:13 PM]	can you please provide direct link to presentation?	Franklin L. Stubbs LeBaron (Guest)			
~30:00 [3:29 PM]	I cannot find the presentation on your website, can you please send me a direct link?	Franklin L. Stubbs LeBaron (Guest)	~40:00 [3:39 PM]	http://www.elpasompo.org/RMS2050MTP	McDaniel, Timothy A. (MPO)
			~40:00 [3:39 PM]	https://twistcms-shared.s3.us-west-2.amazonaws.com/111/media/52541.mp4	Perez, Sonia A. (MPO)
			~40:00 [3:39 PM]	The last one takes you to the video recording directly	Perez, Sonia A. (MPO)
			~41:00 [3:40 PM]	We can provide you with a PDF of this presentation before the end of the meeting.	Plourde, Harrison T. (MPO)
~41:00 [3:41 PM]	thank you. do you have pdf or power point?	Franklin L. Stubbs LeBaron (Guest)			
~41:00 [3:41 PM]	ok, that is what i am looking for	Franklin L. Stubbs LeBaron (Guest)			
			~45:00 [3:44 PM]	https://www.elpasompo.org/media/MTP/RMS2050MTP/PublicInvolvement/Public_Involvement_Presentation(PDF).pdf	Plourde, Harrison T. (MPO)
25:03	Hello? Hello?	Grace			
25:10	Yes.	Grace	25:07	Yeah, I think Grace?	Eduardo
			25:12	Please, go ahead.	Eduardo
25:13	Yes, I was wondering if there's any projects coming past Socorro to San Elizario and Fabens and Clint and Tornillo? I remember having the 375 project that was supposed to come down this direction and I don't see any short term of any of our problems out here cause we're really congested out here, and we don't have enough outlets from this area. What happened? How come we're being ignored?	Grace	25:53	Alright, well let me try to address that. And I'll give you the answer. The first part of the answer and the rest will probably have to come later as we do a little more research, but you're probably referring to the Border Highway East project.	Eduardo
26:10	Yes.	Grace	26:11	That extends Loop 375 and goes parallel to I-10, between I-10 and the International Border. That project is not in the short term. The first phase of it is in the outer years. It's something that TXDOT has been looking at for quite some time and.	Eduardo
26:40	Yeah, thirty years.	Grace	26:40	Right.	Eduardo
26:41	Thirty years.	Grace	26:42	Exactly right. And so yeah, I mean we, we're getting a lot of feedback and comments about Border Highway East. And we will definitely, I mean I can tell you right now that its in the outer years. Off the top of my head, I cannot tell you the exact year, but it is not funded yet so it's not part of the TIP. And again, I believe it's in the outer years. Right now, it is somewhere after the year 2032.	Eduardo
27:18	Is there any way that it could be before that, at this stage, considering our dilemma?	Grace	27:25	Yeah, actually yes. The, projects right now are, I mean what we have right now for example in this plan, it really is a snapshot in time. Projects can move around as priorities change, as development trends change. So yeah, I mean the fact that right now it is in the outer years doesn't mean that it couldn't be accelerated, but that requires coordinating with not just with the MPO, but it requires coordinating as well with TXDOT and the local governments that where the Border Highway would cross, which would be pretty much the City of Socorro and San Elizario as well.	Eduardo
28:10	Ok, so I guess we need to get a meeting with TXDOT then, in order to continue on with MPO, correct?	Grace	28:19	Absolutely, and we are doing that already. We're going to start facilitating a meeting with TXDOT and some other elected officials that have expressed interest, and including miss Maya Sanchez. She asked a question a few days or weeks ago regarding Border Highway East, so we are going to have a meeting, organize a meeting with TXDOT and so we can update and see what can be done to accelerate the project.	Eduardo
28:52	Ok, thank you.	Grace	28:53	Sure.	Eduardo
~29:00 [3:28 PM]	Thank you Mr. Calvo!	Maya Sanchez (Guest)			
32:29	I have a question. Can you hear me? Hello?	Franklin	32:36	Yeah, we can hear you. Not very well, but we can hear you. And can you please identify yourself?	Eduardo
32:42	Can you hear me better now?	Franklin	32:44	Yeah.	Eduardo
32:45	Hi, my name is Franklin. I just have a question. Can you go back to the slide where you guys were talking about the pollutants? Maybe break it down or explain it a little bit more in layman's terms? I'm not sure exactly what the information is that's being conveyed.	Franklin	33:02	Ok. Let me take a stab at that. So, the three pollutants that you see in the first column, those are the ones that we have to monitor and are the ones that we have to deal with per the Clean Air Act procedures. The second column, which is a budget. A budget really means is the maximum allowed of emissions that can result from this, from our plan. In other words, its a ceiling. The numbers that you see there, the following columns for 2022, 32, 40, and 50 are the actual emissions that we are estimating that are going to be resulting from all the activity in those future years. Well, even though 2022 is the current year. But so, the bottom line what this is showing is that we are well below the maximum amounts of emissions that are allowed. So, the good news is that, yes we passed the test.	Eduardo
34:11	Right. Who sets these standards? Is this the EPA?	Franklin	34:15	Yeah, it's a combination. It's following federal law, but it's a combination of EPA, with the state, with TCEQ, the Texas Commission on Environmental Quality. Yeah, it goes through a pretty complex process, because transportation or mobile sources are not the only source of emissions for these pollutants. You've got point sources like factories, or and then you have other types of sources of pollutants. But I mean clearly transportation plays a very important role in emissions, so we have to obviously we also play a very important role in making sure that we reduce the emissions in the future.	Eduardo
35:07	Ok, great. Could you go back a slide or two? There was one, I think I had a particular question. This one right here. So, carbon monoxide, ozone non-attainment area, what does that mean? Ozone non-attainment area, I'm not capturing that.	Franklin	35:26	So, again our, within our region we are in non-attainment for three pollutants, for which are PM10, ozone and carbon monoxide.	Eduardo
35:40	Ok.	Franklin			

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Public Comment		MPO Response			
Time [Chat Entry]	Comment	Speaker (Chat Entry)	Time [Chat Entry]	Comment	Speaker (Chat Entry)
			35:41	So what we're showing in this map is that these non-attainment areas for each pollutant are not geographically the same. So, we're trying to show here that the bigger area which is the one that you see in light green which covers all of El Paso County, plus some pieces of southern Dona Ana County, covering the City of Sunland Park and Santa Teresa and all that. So, all of it, all of that is the non-attainment area for ozone. Now on top of that what you see there in hatch is the PM10 non-attainment area which is, corresponds to the limits of the City of El Paso in 1991. Not the current limits, but those, the limits as they were in 1991. I mean that's the way the regulation was established. So, what you see in hatch is on top of being in non-attainment for ozone, is the non-attainment area for carbon monoxide, I'm sorry for PM10. So, then the third part, that little piece that you see towards the southern part in yellow is the area that, in addition to being in non-attainment for ozone and PM10 is also in non-attainment for carbon monoxide. It's a very small area, but that's what the regulations historically established. The good news is that we are on track and pretty much on the way to get out of non-attainment for carbon monoxide. And as Claudia explained earlier, we are in the maintenance stage which is, we are on the way out. We still have some time because these maintenance periods, we need to show that we are below the maximum emissions as recorded by the monitors for two consecutive, ten-year periods.	Eduardo
38:00	Oh ok, well. So sorry excuse my ignorance here. I, so you, by non-attainment you mean what? I'm, non-attainment, that doesn't register in my mind as to what are you, what that means?	Franklin			
			38:14	So, what happens is that every urbanized area, you have monitors that measure the amounts of pollutants that are in the air. So, if you, at some point in time historically whenever they measured them, if you were over a certain amount, then you're designated as non-attainment. In other words, the amount of pollutants that you have in your air and I'm assuming its similar with water for example with the Clean Water Act. If you are over that maximum, then you are designated as non-attainment. So, the whole idea is that in, as you move on to the future, you try to clean up the air. In other words, you need to show that the amount of emissions that are being generated, in our case by mobile sources, which are cars and trucks, are below a certain amount that would lead us to have a cleaner air in the future. In other words, we're in non-attainment, but the whole idea is to move on to attainment in, sometime into the future.	Eduardo
39:36	Got you. That makes, that was the missing link in my mind, you that's what answers everything. Cause I just didn't understand what non-attainment meant. So, non-attainment means in this case, we want to get out of non-attainment. We want to.	Franklin			
			39:52	Exactly. Yeah, absolutely.	Eduardo
39:53	Ok. So, I mean you're saying we're on our way there, so that's good news. Alright, thank you sir. I appreciate you taking the time. That.	Franklin			
			39:59	Sure. Absolutely.	Eduardo
40:01	My questions.	Franklin			
40:18	Hello?	Grace			
			40:19	Yes.	Eduardo
40:20	Yes, my name is Ben. On the previous chart that you had, I noticed that there's a dark area within the border between Juarez and El Paso and down that valley. Does that make reference to an, to some emissions that are not considered that are coming from Mexico?	Grace			
			40:45	Well in general terms, I mean obviously we share the same airshed, we share the same air.	Eduardo
40:54	Right.	Grace			
			40:55	With Ciudad Juarez of course. And so yeah, I mean some of the pollution that we measure in El Paso is coming from Ciudad Juarez I think that's pretty clear. But in, as the federal authorities and the state authorities established the whole thing of conformity and establishing the budgets and all that, that pollution coming in from Juarez is taken into consideration. In other words, even though yes, we share the same airshed and the same pollution, but we shouldn't be penalized on the U.S. side for pollution that is coming on, coming from the other side, right? So, a lot of that is already taken into consideration as they establish the maximum amounts and all that.	Eduardo
41:51	But it's, it's not a matter of getting penalized. There's no reason why El Paso or this area should be, this region should be penalized. The ones that should be penalized is that anything that have been worked out with Mexico. Because the air, we get fresh air when there's no pollution. Once their emissions are released and factories and all that comes into plays, that's where it starts all this emissions, right? All this pollution starts basically when there's no, it's not regulated by the particular city or county, in this case being Mexico. Does that make sense?	Grace			
			42:45	I'm not sure that I understand the question.	Eduardo
42:51	Does Mexico, is Mexico working to resolve this problem? Do you have any idea?	Grace			
			43:00	If I can.	Dr. Sal
			43:01	Go ahead Salvador.	Eduardo
			43:02	Yes, definitely. The El Paso MPO, Texas, TCEQ, Texas Commission for Environmental Quality, EPA, are stakeholders in a bi-national group that involves Mexican authorities on the environment.	Dr. Sal
43:25	Thank you.	Grace			
			43:26	And there are meetings, very quite often, where all of these issues are discussed. And yes they, perhaps not the same guidelines, but they do have also laws that restrict the, or care for the environment. They do have, for example, inspections of Mexican vehicles and every so often, the U.S. side asks to revise and to review those guidelines. So yes, Mexico is also doing something about it, yes.	Dr. Sal
44:10	It's participating.	Grace			
44:13	Ok, great.	Grace	44:12	Yes.	Dr. Sal
44:16	Thank you.	Grace			
			44:17	And actually this bi-national committee that Salvador was referring to, has participation from all levels of, from both sides of the border. On the Mexican side, they have people from the municipio, I mean municipal, authorities, from the state, and also from the federal, at the federal level.	Eduardo
			44:40	Yes, also to mention that El Paso MPO is also part of the voting members at the committees, named joint advisory committee, there is mention.	Claudia
44:57	Ok thank you.	Grace			
			44:59	Sure.	Eduardo
46:13	So our questions have to be directed to where you said, I'm sorry?	Franklin			
			46:19	Harrison, can you back to the, perhaps to the slide that shows all the different options?	Eduardo
46:30	Ok, and I just got the link to that presentation so I should have it. Ok. Thank you so much. Appreciate it.	Franklin			
~47:00 [3:46 PM]	Are the comments voiced in this meeting sufficient?	Maya Sanchez (Guest)			
			~52:00 [3:51 PM]	The comments voiced in the meeting will be transcribed and included in the final document, along with the comments submitted separately.	McDaniel, Timothy A. (MPO)

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Public Comment			MPO Response		
Time [Chat Entry]	Comment	Speaker (Chat Entry)	Time	Comment	Speaker
~19:00 [6:23 PM]	How many people participated in the surveys?	Richard Dayoub (Guest)			
			19:42	Sonia, maybe you can respond to that?	Harrison
			19:49	I don't have that on top of my head, but I can look for it and I can respond while we have another answer or questions.	Sonia
			19:58	And I was able to locate the final report Sonia, and there we had a total of forty-three respondents.	Gaby
			20:07	Thank you Gaby.	Sonia
31:55	Harrison, can you hear me?	Richard Dayoub			
			31:56	Yes. Yes sir.	Harrison
31:57	Ok, good. So I was in the midst of preparing a lengthy question, but I can ask, it'll be quicker. As they just covered of the some information regarding air quality attainment and the challenges I find this very informational and useful. But given that there was a meeting here in El Paso this past week. Ambassador to Mexico was here, Congresswoman Escobar, DHS, CBP, local elected leaders were all part of this meeting to discuss. It made the news. I think Congresswoman Escobar even issued a press release on the subject referring to the BOTA five-year plan, which is already becoming controversial. My first question is were members of the MPO and TXDOT included in that meeting?	Richard Dayoub			
			32:58	Well, I don't think I can answer that. I don't know if.	Harrison
33:04	Eduardo possibly could answer that.	Richard Dayoub			
			33:05	Yeah.	Harrison
			33:06	Yeah, so are you referring to any meetings that happened with, between the Congresswoman and the Ambassador?	Eduardo
33:16	Yes, last week.	Richard Dayoub			
			33:18	Yeah, no, I mean we did not participate on, in those meetings.	Eduardo
33:23	Ok, well its good to know. The reason I asked that question Eduardo, thank you for answering, is there's already been a lot of confusion, a lot of concern mostly because of the lack of information. I won't say transparency, but information as to what the BOTA five-year plan actually entails. And at least one of the plans I've seen indicates that there is a plan to build a special truck bridge coming over near the BOTA and to acquire property on both sides of the border, but particularly in El Paso where they would have a special inspection station, a facility, to help expedite these trucks coming through and then get them back on the road. But unfortunately, in the area they're talking about it's still an area that's already got a huge issue with truck movement. Stagnation is better, probably a better choice of words as they sit on our roads for hours on end. I'm not sure this will mitigate that or not. I think that as they go forward, I'm only offering these comments because it is a public meeting. I think the MPO in particular and TXDOT ought to be at the table for those meetings because it will ultimately affect what you all are doing and where your prioritizations are on projects, especially if it's a five-year plan. They were just talking about what we have in the queue for four years, so that's just one year outside that, so I just got to imagine that there's some oversight that needs to occur and that there's been some error on someone's part to not have included you both. Going forward I think they should.	Richard Dayoub			
			35:19	So Richard, well first of all, procedurally we will record your comment, your question, and it'll be part of the record for this process and we will provide an answer to you, to your question. What I can tell you right now is that we were quite surprised to see that announcement, although again it's a good thing that there is now a lot of interest in improving the Bridge of the Americas. Now we have not, I mean I have not seen anything as far as a formal proposal or any concept or any alternative regarding what the improvements are. But I can tell you that we will be part of that process. I can guarantee that the MPO and TXDOT will be part of any process to identify alternatives and what the final alternative is. I don't think any decision has been made. And well, I'll leave it at that because I don't know, I don't have the whole facts. But we will, between now and when we put out these responses to the comments, we'll do a little research and provided a little more information regarding your question or comment.	Eduardo

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Time [Chat Entry]	Comment	Speaker (Chat Entry)	Time	Comment	Speaker
36:46	Thank you Eduardo.	Richard Dayoub			
37:32	Ok, I do have a question. It, this is kind of basic, ok I was listening to the other person, and that seemed pretty complicated. This is kind of basic so I'm looking at your presentation and I'm just wondering is all of this, especially what I'm concerned about is the pollution around the areas of the, of I-10. I live close to I-10 in the Sunland Park area and my air is not clean. I know that when I go out for walks. But I'm looking at this that its projected or I guess it's been determined that the pollutants are going to be decreased. Is that, what is that based upon? Is it based upon the imagine downtown sector being plan or what is it? What is it based on?	Sylvia Searfoss			
			38:30	If I can try and answer that one. Several things and I guess the main one is in the future, the different pollutants, mobile source pollutants, will be decreased based on technology. And the MPO what it does is, with the help of the Texas Transportation Institute, their mobile emissions group, they use a software, a special software that does estimate emissions for a typical fleet, or an average fleet I would say, I should say that. Different vehicle, fuel types, diesel and gasoline, even gas, natural gas. And so for different years, the emissions that a given vehicle depending of course of the model year has a certain amount of, or emits a certain amount of pollutants over the years as technology progresses and as we see that historically as well we or in this case this software, which is approved by the federal, EPA, I'm sorry the Environmental Protection Agency, estimates show that those emissions will go down. In addition to that, that's the emission per, for each of the vehicles. And you're right, in addition to that the fact that congestion in some areas in this case near New Mexico will be reduced, that also can help reduce emissions as well. I don't know if that helps answer the question.	Dr. Sal
41:00	Well, yeah it does, it does. I just, again, its to me, it sounds good. But I don't know if reality really speaks to that because it just seems like we are not making much progress technology, technologically to reduce. I, and again with factors that play into our situation like even the pandemic that we're in right now, it's limited people. I guess there is a market for cars or for new cars, but there aren't any I guess the supply of new cars and so there's going to be a lag in the kind of car that's out there, that we're going to be driving our old cars if we don't have access to something that's, that doesn't pollute as much.	Sylvia Searfoss			
			42:01	And I should say. I'm sorry go ahead.	Dr. Sal
42:02	I'm just saying, it's I know they said, just projections when they're not exact. But I know there was a lot of work done here in the Sunland Park area, there was a lot of construction that was done. It's been reconfigured or whatever where it's been worked and there's really hardly any congestion in this area. It's further up, further up from us. Going into the downtown area, I don't, I've never run into any kind of congestion, but like if I'm going up to New Mexico, yes there is that slow down the closer you get to Arcraft. But in this area, but its still kind of polluted because there's that constant traffic. Its just a constant traffic. And I really don't want to see more traffic on I-10 to tell you the truth.	Sylvia Searfoss			
			43:07	Yes and again the information that we have, is of course, even for 2021, I mean its, not everybody has a new model of vehicle. So, with that, we take that into account, we understand and we know what's the distribution of age of our current fleet and for the different forecast years we also have or in this case this models by the EPA and the Texas Transportation Institute have or provide an average age of the fleet and a distribution of those ages. Even with that, say in 2032, even if not everybody is using a 2032 new vehicles, the age, the fleet of the age by that time will still allow for a reduction, the technology will allow for a reduction, per each of the vehicles per mile of travel. Overall, the net emissions will be lower for the same amount of travel that compared to 2022, for example. We know that for, from a lot of the information that we have for a fact.	Dr. Sal
44:49	Ok, well, thank you. Thank you for answering my question.	Sylvia Searfoss			

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Public Comment		MPO Response			
Time [Chat Entry]	Comment	Speaker (Chat Entry)	Time	Comment	Speaker
			44:52	Sure.	Dr. Sal
			44:53	Thank you. Thank you for commenting. Wondering if, could you give us your name just so we have it in our, in the record for the comment record?	Harrison
45:05	Ok, my name is Sylvia Searfoss.	Sylvia Searfoss	45:08	Ok, thank you.	Harrison
46:42	Hi all, this is Scott White.	Scott White	46:46	Hi Scott.	Harrison
46:48	I have some process questions because I'm trying to figure out, because I've been to enough of these meetings and trying to understand. When I look at these, the documents, going through, I've been looking for what is a discernible goal in the MTP and the STP. And I'm not finding something and I don't know maybe I'm missing it. But I'm not finding anything that's an actual goal. It just, it reads to me like there's lot of really great ideas, but then when it comes down to the goal it, that seems to be missing. And I'm not sure if I'm missing that or if that's something that just has never managed to make it into these documents. Or is something that the TPB could actually charge you all as a staff to include? I'm just kind of curious about that.	Scott White			
			47:53	Yeah, I think if you're looking for a yeah, like a singular goal statement or objective for the MTP, then no you're probably not going to find that. And I think part of that is because it's not, we call it the long-range planning document and it is, but it's not quite the same as a for example, a comprehensive plan that a municipality would put together. Which is a, those are on the highest level, those are aspirational documents. And the for us, the MTP is, it's in a way aspirational, but it has to be grounded in the realities of the projects that entities are proposing and the specific performance measures that MPOs are required to strive toward meeting. And so, so it does make it a little bit different then what a municipality might call a long-range plan.	Harrison
49:34	But I'm not even, I'm not even finding the performance measures that we're aiming for. If, it seems, especially with the MTP, there's lots of wonderful aspirational things. We have the visioning statements that says, this is what people want. But where, I'm not finding goals or performance measures or anything like that, that says this is what we want to work towards. It's, it seems to be more of an ad-hoc process that appears later on in the TIP. As the communities and TXDOT and whatnot add projects. And if it's working like that, had we, how can we ever set these kind of performance measures that move us towards what we as a region want? And that's the kind of process I'm kind of trying to, I'm struggling to understand.	Scott White			
			50:35	Well and just to clarify, when I say performance measures, I mean the federal performance measures. The three metrics that we are obligated to abide by and work toward, which they're very broad and the details are worked out as the, as time passes, I suppose, but those are the air quality emissions, congestion and safety.	Harrison
51:19	Which brings me back around to then how do, as Edward has said several times over the past few weeks, he's not happy with this, he sees it as a call to action. But how can we use it as a call to action if there, if it's, if these goals are just hanging out there undefined? And that's the process I've been, as I look at this more and more and more, I keep wondering, why can't we set some goals? Why can't we work with the TPB to say what is it as a region that we want to achieve by 2050? Just like the Texas Transportation Commission has set their road to zero goal of reaching zero serious or fatal traffic crashes. Why can't we have elements like that, that we can work towards?	Scott White			

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Public Comment			MPO Response		
Time [Chat Entry]	Comment	Speaker (Chat Entry)	Time	Comment	Speaker
			52:26	Scott, let me jump in here. First of all, the, well the let me just give you the sort of like a short answer. The process is not easy, and it's not a perfect process. And it's not perfect here in El Paso nor is it in Dallas nor is it anywhere. The whole theoretical process of establishing a vision, a mission, and then everything being perfectly consistent when you get to the project level. However, what I've said is that we really have to do a much better job in improving how the process works, which I think is what you are asking. It's, I beg to disagree a little bit with you in the sense that what is it that the community wants. It's, and I know where you coming from but not everybody shares your vision, right? However, we have to.	Eduardo
53:34	They don't have to share my vision. I'd just like to see a common vision out there that we, we're working towards.	Scott White			
			53:41	Exactly. Exactly right. So, getting to that common vision that is not very, difficult to do because again that's where you have such a diversity in members of the Policy Board that reaching that absolute consensus on a mission, on a vision statement is complicated. Well, what I think we need to do and I've offered this well to you and to everybody is we need to have a, initiate a solid, more intense discussion about these issues moving forward. I think that more on a continuous basis, not just do an exercise at the beginning of every MTP cycle. But I think we, that's something that we need to do more on a consistent basis. And it's not just asking people, what is it that you want. Wouldn't it be nice if something happened, right? It, we really need to do a better job in backing up with data, with analysis. And I think what we've done in this MTP is we're scratching the surface in terms of that. But, we definitely, your comments are well taken and we'll include them. I mean, it's very difficult to transcribe a conversation like this in a public comment document, but we.	Eduardo
55:11	No, that's fine. I'm trying to understand the process so I can actually write it into my comments and make sure it's a well-informed comment so.	Scott White			
			55:21	Right.	Eduardo
55:25	So the transcribing all this, I'm not worried about it.	Scott White			
			55:27	Ok.	Eduardo
55:28	It's going to be written down and I'm going to send it to you, but.	Scott White			
			55:32	Perfect. That's good to know. And again, we can, we'll respond to you and as part of the process, but I think more important is how we engage continuously, consistently and in the next months and years.	Eduardo

PUBLIC COMMENTS AND RESPONSES RECEIVED DURING PUBLIC MEETING (FEBRUARY 21, 2022) FOR RMS 2050 MTP, RMS 2023-2026 TIP, AND TCR

Public Comment		MPO Response			
Time [Chat Entry]	Comment	Speaker (Chat Entry)	Time	Comment	Speaker
55:55	<p>Yeah, and that's what I would really like to see is a way to engage the board in these kind of discussions that we can't do normally. When we have the regular TPB to have three minutes to try and explain this concept, doesn't get us very far. And so I think there needs to be greater in depth discussions in some way, somehow, and I don't know how so I'm not going to say that we have to, it's just I recognize that there's a need to do that because there are certain times when we start talking about certain issues that somebody from the public like me has an idea or from the folks out in the Mission Valley, who want the Border East and they're not happy with the answers they're getting right now. But how do we, how can we even at this point, set a long-term plan or a long-term goal, whether it's the MTP or some other kind of document, that helps, that provides some metrics that we could work towards that say ok, we know we're working towards conformity, but is there a way we can actually further reduce air pollution to ensure that if the technology doesn't come to pass as it's been promised, we're still going to remain in conformity? So, or people have said they want greater safety, Commissioner Ryan has said we've got to have safety, how do we build that into the plan for the long run? People have said they want better access to transit in the visioning. How do we make sure we get more funding for that? And maybe that is, something like that, is the solution to instead of building a Border East it's to invest in a better transit system. I don't know it, it's just, but if we have those goals out there and the TPB and the TPAC and everybody else knows, it helps I think keep them focused on what projects move us forward and what are just the same old project that aren't really fixing our, aren't really addressing our needs, but people think they are.</p>	Scott White			
			58:31	Great, good points. So, make sure you include all that when you submit your comment.	Eduardo
58:39	<p>Yeah, I will. I'll definitely try and remember what I just said. But I had another thought, because I know we went through the membership of the MPO process a long time ago and I saw there was a transit committee as one of the things built into the bylaws for the MPO. To get some of, some greater input would it be possible, would that be one of these mechanisms to allow for some of these greater discussions? To actually activate that committee or maybe or, Mike Medina before you had talked about an active Transportation Committee for, with the MPO. I mean are these things that might help also focus on the discussion to the future so that we're thinking about other solutions and not just the same old solutions all the time?</p>	Scott White			
			59:46	Right. Yeah, I think that's, you're getting into other different territory about.	Eduardo
59:55	<p>Yeah, I know it's getting into other territory, but if it helps us plan for the future better.</p>	Scott White			
			59:59	<p>Absolutely, no absolutely. I mean, I think that's a very valid comment and suggestion that we can address. I mean of course, every time that we talk about modifying the bylaws or creating new committees or. That becomes more of a, I think that that we can achieve what you are thinking and we will look at that with the creation of other types of committees where we get people that are more technical. I mean, getting board members to serve on these committees don't, hasn't worked very well. But, we can certainly think about a mechanism where we incorporate some of these or create some of these committees. Doesn't have to be a formal Policy Board committee.</p>	Eduardo

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Public Comment		MPO Response			
Time [Chat Entry]	Comment	Speaker (Chat Entry)	Time	Comment	Speaker
1:00:58	Yeah, it's just some way to add diversity to the voices that are filtering the message up somehow.	Scott White			
			1:01:07	Right.	Eduardo
1:01:13	So, back to the MTP and the TIP. If we made all this happen, in the future, would that, would those goals and those metrics be something that we could actually look at including in these documents because I think that would give the public a better understanding of where we're actually headed.	Scott White			
			1:02:00	I'm not sure that I understand the comment or the question Scott.	Eduardo
1:02:06	Ok. I know right now, we're not including these very measurable goals, metrics, the performance measures outside of what is called for currently. But is that something we could include the additional, the goals that are set by the Policy Board? I'm just, that we want to include, that we want to increase transit ridership by x percent for example. Is that something that in future planning documents can be included to kind of help justify why we are doing certain projects or help the public understand that ok, we're not seeing that, why aren't we seeing that because that was a stated goal? Helps the public know where the MPO is headed and what projects they selected. Because I hear the County celebrating their additional transit lines that they got up and running now and I'm sure they want to see more of that sort of thing. So it, is that, if they said we want to include that in these kind of documents, their two representatives said we want to include this as a demonstrable goal, is that something that something they, that could be done?	Scott White			
			1:03:38	If I can. I mean, we are able actually, Scott, to estimate or forecast transit demand. It's actually one of our metrics, the both the number of passengers using transit as well as the mode share. That is, of the total person trips in a day, what percentage is actually using transit. I guess the challenge here is first of all, that the TPB can come back with a goal. Let me, I don't know if you've read all of document, but somewhere there, you can actually see that currently, as of 2022, the transit share of trips is less than one percent of the total number of trips in the El Paso MPO region. And I don't know if the TPB would, can come back and say you know what, by 2050 we want it to be three percent or five percent. Because it's, the challenge to actually improving or increasing transit demand are, it's very complex. It's, it is not just adding routes. It's, it has to do with another, a lot of other things, including densification. And when the TPB members see that densification is part of it, the answers and the goals might change. I mean, I don't know if the, if there will be consensus as to a specific goal. And I'll give you another example. Years back, it was said that as a general goal that we wanted the El Paso region to be the least car dependent.	Dr. Sal
1:06:01	Yeah, Plan El Paso.	Scott White			
			1:06:02	Yeah. And so, but we want to be more specific and say, ok, what do you mean? How many trips? How many, what percentage? That's, that is actually a challenge. So, what those metrics that we actually have right now at least allow us to compare between different options and see, ok this option actually help us reduce marginally, if you may, the number of car trips without actually committing at this point or knowing exactly what is the goal that we want. So, and for that, we do need guidance from the Policy Board.	Dr. Sal
1:06:52	And that's what I mean. Is if the Policy Board says we want to hit three percent transit mode.	Scott White			
			1:07:03	Yeah?	Dr. Sal
1:07:04	That means then we have to start looking at transit in a different way. Not just in meeting that demand, but we have to figure out a way to increase the demand. And that means things like more frequent service, greater density, better route planning. There's a whole lot that goes into it, I'm well aware of that. But it also means we quit, at the same time, we don't keep adding capacity in those corridors because that is the killer of transit.	Scott White			

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Public Comment		MPO Response			
Time (Chat Entry)	Comment	Speaker (Chat Entry)	Time	Comment	Speaker
			1:07:37	I agree.	Dr. Sal
1:07:40	We, and so I'm looking at this in long term. What I would love to see in the city is, I don't want I'm not saying I want people to ride bikes or to take transit or to walk more. I want them to have that option. And we're not providing that option if all we do is keep adding capacity and the lion share of the funding. I keep seeing too many, I see an awful lot of projects that are about capacity versus giving people better transportation options because every time I see a project that says oh we added a bike lane, if it's on a high speed high volume road, I'm not even going to use that thing because it does not feel safe or comfortable. So, we have to rethink our projects and we have to think how do we move that? How do we shift that mode verse? And that's the kind of thing I'm asking.	Scott White			
			1:08:42	Exactly.	Dr. Sal
1:08:43	Because three percent is very tiny in our overall travel usage. But if we, if that is actually somewhere in the document that means somebody can come back and say, ok this is working, this particular project, is working against that goal because it is actually adding vehicular traffic and it serves as a reminder to say this isn't going towards the goals that we have set. If you want to change the goals fine. But we need, it forces people to think a little bit more about the kind of projects they put forward and what they really offer. And that's what I'm trying to get towards.	Scott White			
			1:09:30	No, and I totally understand where you coming, and where you're going. I guess it is exactly because of what you're saying that Eduardo has suggested that this should start the discussion. Because you're right, right now we don't have that specific goal, three percent. But we need to start discussing because for some people it will be, it's unacceptable three percent because then I don't know we need to allow for more congestion and for some people in the community, that would not be acceptable. So, that's the complexity. But we need to start discussing about that and understanding the behavior and what things.	Dr. Sal
1:10:22	Well, I know there's all sorts of tradeoffs and there will always be somebody who's very unhappy if they feel their drive is going to be diminished in any way, shape, or form.	Scott White			
			1:10:31	Yeah.	Dr. Sal
1:10:32	But at the same time, how are we lifting up the folks who can't afford to own and operate a car?	Scott White			
			1:10:42	That's a challenge.	Dr. Sal
1:10:44	And we're taking away their access to opportunity, which then hurts our community. So, I mean, all these things, it's all a tradeoff. But if we don't have those goals there, if we don't force that discussion, I don't see it happening because I haven't seen it happening in all the years I've been going to the MPO and I've been asking sort of the same question all along. And I, Eduardo you know I've been asking that question for some time.	Scott White			
			1:11:16	Right.	Eduardo
1:11:17	Is how do we put, how do we challenge the Policy Board to have that discussion and set some goals and priorities?	Scott White			
			1:11:27	Right, I think part of the answer to this very complicated question Scott is that again, there are competing goals.	Eduardo
1:11:36	Uh-huh.	Scott White			

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Public Comment			MPO Response		
Time [Chat Entry]	Comment	Speaker (Chat Entry)	Time	Comment	Speaker
			1:11:37	So, there may be some people that that really want to have a goal to increase transit ridership to three percent like you were saying. Well, other people they say, well I don't want my congestion level to go above a certain amount. But at the end of the day, I think that those discussions and those tradeoffs need to be brought into the arena with more information, more data, so that they can make more, or better informed decisions. And again, part of the problem that we have is that speaking about transit ridership and Salvador can speak a little bit to that and because that's what was included in Chapter 4. Even if we make some of these very aggressive assumptions about increasing density in some corridors and all that, yes, we get a significant increase in transit ridership, but it's still the minority of total trips by far. So, and it's not up to just the type of projects that we select, it's much more complex. It has to do more in my opinion with land use, and which are really dictating the urban patterns that then we need to go and provide transportation for. So again, I'm not saying that we should do nothing, of course not. But I think it's understanding that there are competing goals and we have those goals established in the plan. I mean certainly I don't want to give the impression that we don't have any goals. Of course, there are goals and all that, but very specific metrics like you are referring to. Yeah, I mean, we don't have something that specifically says three percent transit because based on the trends that we see today, I don't think it's going to be easily achievable unless we have a major change in philosophy and land use.	Eduardo
1:14:00	Well we can't have that change in philosophy, if we're not having that discussion in transportation.	Scott White			
1:14:09	You can't separate the two.	Scott White	1:14:07	Exactly. No, I completely agree.	Eduardo
			1:14:11	Right. That's exactly the point that we're making. That we can't do transportation planning and land use planning or do these actions completely independent of each other and that's really what's happening, more on the planning side.	Eduardo
1:14:30	Yeah, no I'm very aware of that. I've been trying to work with some of the small communities to get them to rethink some of the zoning and development they're doing. And they're just saying, well the developers want to come in and they want to pay us these fees and they want to do this. Hey it's more tax dollars for us, not seeing the long term tradeoff.	Scott White			
			1:14:50	Right, agreed.	Eduardo

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Public Comment		MPO Response			
Time [Chat Entry]	Comment	Speaker (Chat Entry)	Time	Comment	Speaker
1:14:52	So, it's, I mean part of it, there has to be that education and we have a captive audience because we have a certain number of the leadership of those communities as part of the Transportation Policy Board. And then we, it's how do we educate all these folks to understand all the complexity of all the different tradeoffs that we're going through right now just to make, just to build the system as it is versus what we could have if we considered the other options. And maybe the math doesn't work out, one way or another, but if we don't have those discussions we'll never know. And that's why I think it's a very, it's very important to have those kind of discussions and even push to have those goals in there because then we know it's a commitment by the Policy Board or this region to say this is what we are going to do. And right now, the assumption is, seems to me by and large, everybody just wants to drive but that's because we only have given them that option. If we provide different options, different densities, help the small towns develop differently, the results may change. And if we, then when looking into some of the air conformity issues, if we keep going the way we are, unless there really are the drastic air pollution savings from new vehicles or different types of options, we may come to the point where we have to do something drastic. And so those are the kind of discussions I never hear. I don't know if they're happening when I'm not present. I'm sure you all are talking about them in your office. But at the Policy Board and at the TPAC, I've never seen those, that kind of discussion happen. And I think it's important it does so that we do consider all our options and our tradeoffs and who's being shorted in the process. Who benefits from the process? Have a much more robust discussion in the process. That's what I ultimately would like to see so that these decisions are much more informed so.	Scott White			
			1:17:41	I think points well taken. And make sure that you include that in your comment or comments.	Eduardo
1:17:49	I intend to. But I just, that's why I told you, that's why I waited because I know these are more kind of process questions and what you can and can't do and so I just wanted to kind of feel out where the limits of what you can are right now. So that I'm not just spending a lot of time barking up a tree that you don't have the ability to do anything about.	Scott White			
			1:18:22	Ok, sounds good.	Eduardo
1:18:27	Alrighty. Everybody, thank you so much, appreciate the answers. And now I got to get busy, work on that public comment again.	Scott White			
			1:18:39	Great. Alright, thank you Scott.	Eduardo
1:18:41	Thank you have a great night.	Scott White			
			1:18:43	Thank you.	Harrison

Review of I-10 Segment 2 (Downtown) Expansion Proposal and Draft El Paso MPO MTP

Prepared by Norman Marshall, President Smart Mobility, Inc.

for

El Paso County Planning & Development Department

February 2022



Executive Summary

I have reviewed materials related to the proposed I-10 Segment 2 (Downtown) expansion including traffic counts, traffic speed data and transportation modeling files. Based on this review, I present the following findings regarding the proposed I-10 Downtown expansion included in the draft El Paso Metropolitan Planning Organization's (MPO) 2050 Metropolitan Transportation Plan (MTP) (Project ID 1063X-CAP):

- 1) Urban freeway congestion cannot be eliminated.
- 2) Urban freeway congestion is caused by too many short local trips on the freeway, and expansion shifts even more of these trips to the freeway.
- 3) Trucks are not the problem.
- 4) The Texas Department of Transportation (TxDOT)/El Paso MPO model speed and delay metrics are inaccurate, and the model exaggerates the benefits of freeway expansion.
- 5) Adverse impacts of urban freeway expansion are not adequately considered in the planning process including:
 - a. congestion at street intersections caused by concentration of ramp traffic
 - b. diverting traffic away from streets where traffic is the lifeblood of many businesses
 - c. an unbalanced transportation investment strategy that worsens regional congestion in the long run.
- 6) Downtown I-10 recommendations to minimize adverse impacts include:
 - a. eliminate "transit-adaptive" lanes,
 - b. eliminate conversion of portions of Yandell Drive and Wyoming Avenue downtown to frontage roads,
 - c. create a street collector-distributor system that keeps many local trips off I-10, and
 - d. review the number of I-10 general-purpose lanes by section after making the other changes.

I have modeled a preliminary alternative that combines these elements using the 2045 TxDOT/El Paso regional model. The results are promising. I will refine this alternative in the final phase of this project – hopefully using the 2050 MTP model which the *El Paso MPO and TxDOT have so far refused to provide*¹.

¹ The MTP model files were requested immediately after the publication of the Draft MTP on January 24, 2022, and the request was denied on January 25, 2022.

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1 Background

El Paso County contracted with Smart Mobility, Inc. in September 2021 to:

- 1) review I-10 Downtown alternative modeling,
- 2) develop conceptual alternatives, and
- 3) model conceptual alternatives.

I have over 30 years of experience in travel demand modeling. Before co-founding Smart Mobility in 2001, I worked at RSG for 14 years and developed a national modeling practice there. I have experience with dozens of different regional travel demand models across regions of all sizes - including developing new models from scratch, making expensive enhancements in models, applying models, and reviewing models. Clients have included state departments of transportation, Metropolitan Planning Organizations, cities, public interest groups, and the Federal government. I have presented at several national transportation conferences including the areas of dynamic traffic assignment (DTA), induced travel, land use forecasting, modeling non-motorized trips, and transportation system resiliency. I have attached my resume at the end of this report.

When the contract was signed in September 2021, we immediately requested data from the El Paso MPO and from TxDOT. The MPO quickly responded but we didn't receive all the TxDOT data until late December. This delay hindered progress on this project during this 3-month period.

The data received includes:

- traffic count data,
- traffic speed data, and
- TxDOT/El Paso MPO regional modeling files for the 2045 MTP and 2045 MTP Amendment 2.

I call it the TxDOT/El Paso MPO model because the MPO is not at liberty to provide the entire model. That requires a license agreement with TxDOT. We have not received the modeling files for the 2050 MTP. The El Paso MPO claims that they cannot provide these files until the MTP and conformity determination are approved by the Federal government in November 2022. There is no such Federal requirement to withhold these data. In fact, these data are essential to a complete review of the MTP.

Review of the Draft El Paso MPO Metropolitan Transportation Plan (MTP) was not originally part of the scope but as it is integrally linked to the Downtown I-10 project, it is critical that I prepare comments now during the comment period, although I am continuing to work on the final phase of the project.

This report summarizes findings from Phases 1 and 2 and some preliminary findings from Phase 3.

2 Urban freeway congestion cannot be eliminated

Despite billions of dollars having been spent on urban freeway expansion, urban freeway congestion has gotten progressively worse. The 2020 report *The Congestion Con*, published by Transportation for America states:

In an expensive effort to curb congestion in urban regions, we have overwhelmingly prioritized one strategy: we have spent decades and hundreds of billions of dollars widening and building new highways. We added 30,511 new freeway lane-miles in the largest 100 urbanized areas between 1993 and 2017, an increase of 42 percent. That rate of expansion significantly outstripped the 32 percent growth in population in those regions over the same time period. Yet this strategy has utterly failed to “solve” congestion...

Between 1993-2017, the total annual hours of delay (the extra time spent traveling at congested rather than free-flow speeds) in the nation’s top 100 urbanized areas has increased by a whopping 144 percent.²

The statistics for the El Paso urbanized area for 1993 – 2017 are:

- 45% increase in population
- 102% increase in freeway lane miles
- 157% increase in congestion delay

Freeway expansion in the El Paso region has not reduced freeway congestion. A particularly notable Texas example of the failure to solve urban freeway congestion through expansion is the Katy Freeway in Houston.

With 26 lanes at its widest point, the Katy Freeway in the Houston metro is the Mississippi River of car infrastructure. Its current girth, which by some measures makes it the widest freeway in North America, was the result of an expansion project that took place between 2008 and 2011 at a cost of \$2.8 billion. The primary reason for this mega-project was to alleviate severe traffic congestion.

And yet, after the freeway was widened, congestion got worse. An analysis by Joe Cortright of City Observatory used data from Houston’s official traffic monitoring agency to find that travel times increased by 30 percent during the morning commute and 55 percent during the evening commute between 2011 and 2014. A local TV station found similar increases.³

In the larger Texas metropolitan areas, TxDOT has largely given up on trying to eliminate peak period freeway congestion – instead focusing on constructing parallel managed lanes where vehicles are restricted to certain vehicles, and/or are subject to tolling. For these managed lanes to attract traffic, it is implicitly assumed that the general-purpose lanes will be congested forever.

² Transportation for America. *The Congestion Con: How more lanes and more money equals more traffic*, 2020. <file:///C:/Google%20Drive/Library/Congestion-Report-2020-FINAL.pdf>

³ Schneider, Benjamin. *CityLab University: Induced Demand.*, September 6, 2018. Bloomberg CityLab. <https://www.bloomberg.com/news/articles/2018-09-06/traffic-jam-blame-induced-demand>

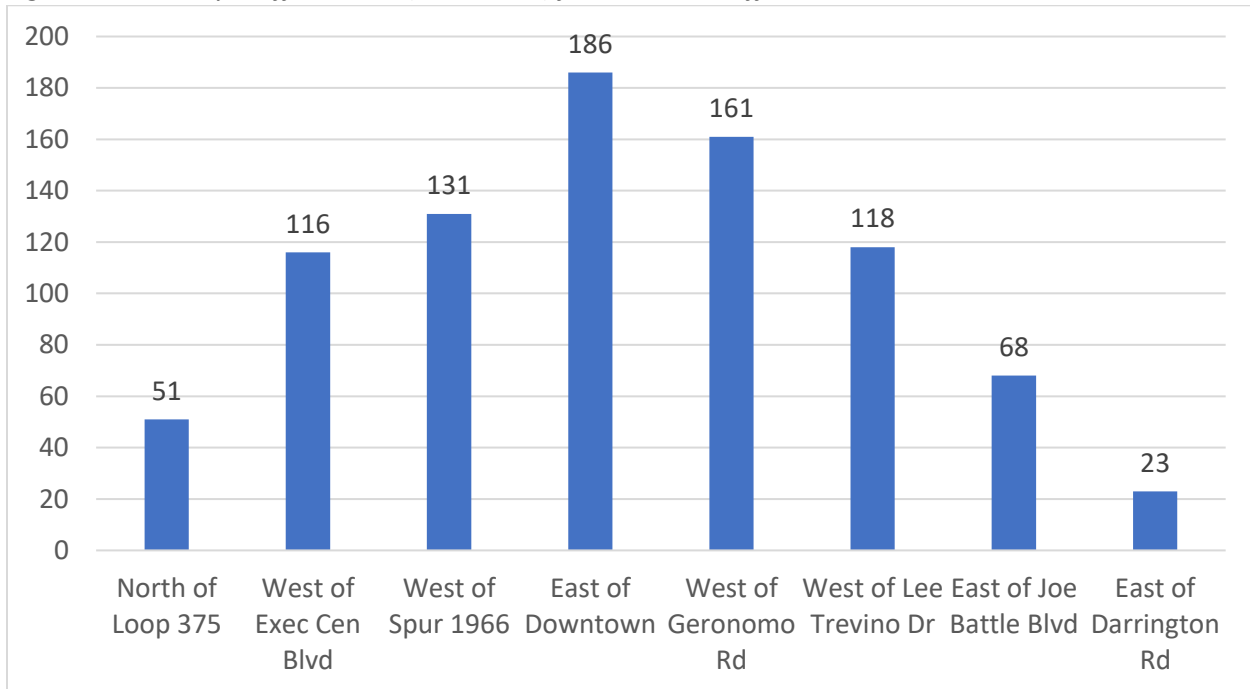
I-10 expansion could be beneficial, but it is important that expectations be realistic. Freeway expansion projects have consistently failed to live up to their promises.

3 Urban freeway congestion Is caused by too many short local trips on the freeway, and expansion shifts even more of these trips to the freeway

We have understood why expansion cannot eliminate urban freeway congestion for at least 30 years, although we have often ignored this knowledge in our planning processes. In 1992 Anthony Downs coined the term *triple convergence* to describe how peak period traffic congestion is inevitable because drivers will compensate for capacity increases by (a) shifting routes, (b) shifting travel time of travel, and (c) shifting travel mode.⁴ After capacity expansion, the new equilibrium will be just as congested as the old equilibrium. Downs describes how drivers will choose “limited-access roads that are faster than local streets if they are not congested”, but the attractiveness of such routes will cause them to become congested “to the point where they have no advantage over the alternate routes” (i.e., over arterial and local street routes).

In the El Paso region, local traffic comprises most of the traffic on I-10 in the Downtown section. Figure 1 shows daily traffic counts compiled by TxDOT at various I-10 locations.

Figure 1: I-10 Daily Traffic Counts (Thousands) from TxDOT Traffic Counts



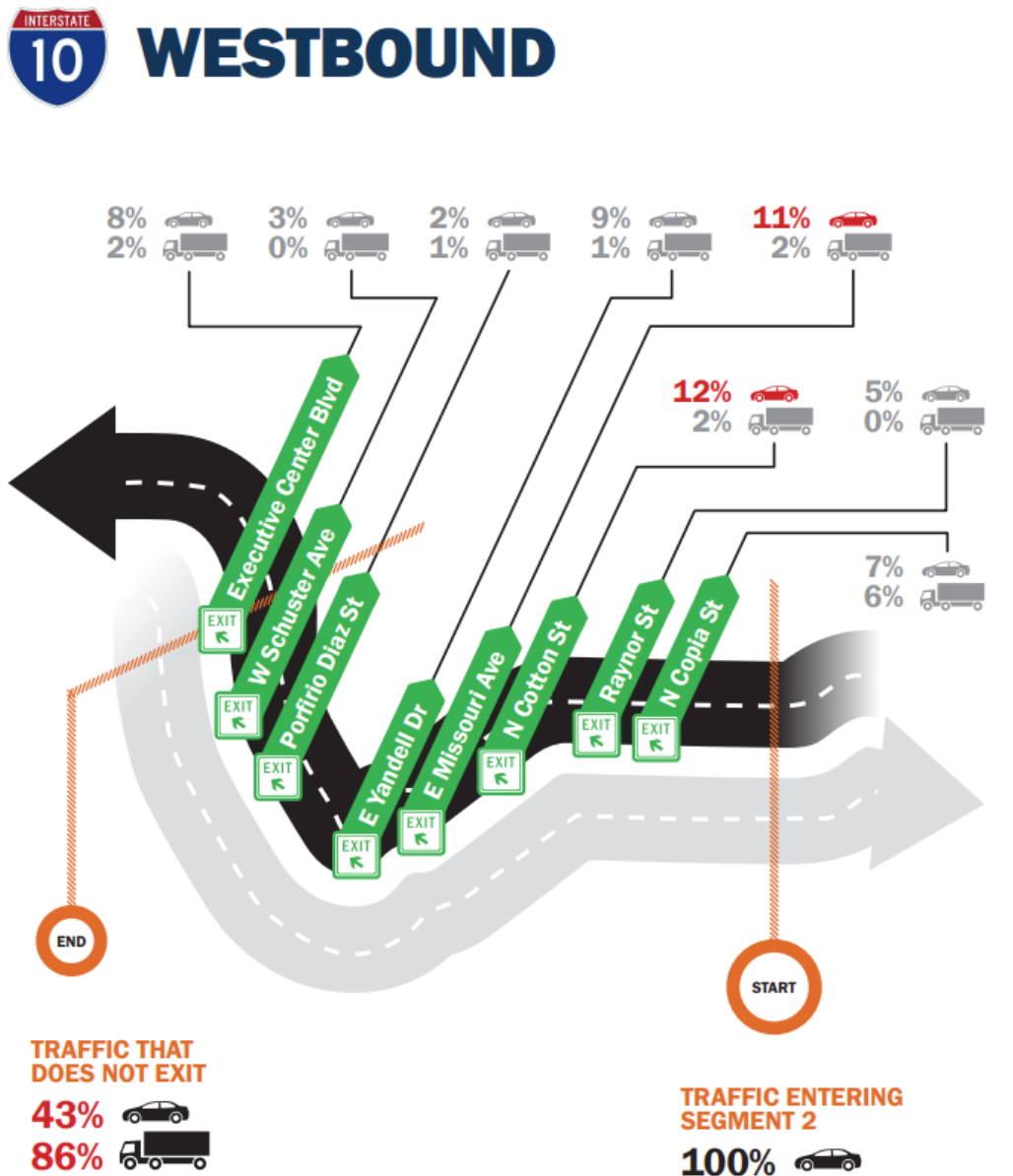
As shown in Figure 1, the daily I-10 traffic volume east of Downtown is almost 4 times as great as it is to the north of Loop 375 and 8 times as great as it is at the southern end of the region. Even at these outer

⁴ A. Downs. *Stuck in traffic: Coping with peak-hour traffic congestion*. Brookings Institution, Washington DC (1992)

locations, through traffic represents only a small portion of total traffic. In the 2017 base year model, there are only 650 trucks and 2100 autos daily traveling all the way through the region on I-10. This represents 1.5 % of total daily traffic to the east of Downtown. Most of the “external” traffic has origins or destinations inside the region.

I-10 Downtown materials prepared by TxDOT illustrate that only 43% of cars entering Segment 2 from the east continues past the end of Segment 2 at Executive Center Boulevard. More than half (57%) exit in the greater Downtown area. A third of the traffic entering from the east exits at East Yandell Drive, East Missouri Avenue or North Cotton Street.

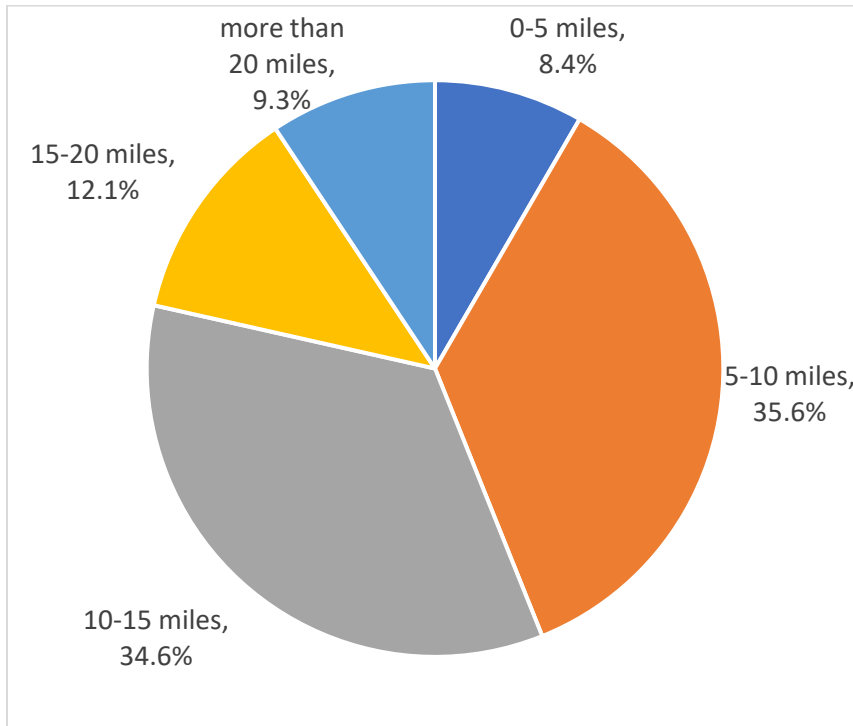
Figure 2: I-10 Daily Traffic Counts (Thousands)



Source: https://www.reimaginei10.com/docs/TxDOT_EPCS_Boards.pdf

TxDOT most likely prepared the data in Figure 2 using the regional transportation model's "select link" feature. I used this same feature to analyze Segment 2 on-ramps and off-ramps in the 2017 base model. The trip length distribution of all vehicles entering or exiting I-10 in Segment 2 during the model's afternoon peak period are summarized in Figure 3.

Figure 3: Trip Length Distribution for Trips Entering and Exiting I-10 Segment 2 During the Afternoon Peak Period (2:30 – 6:30 p.m.) calculated from the 2017 base year model



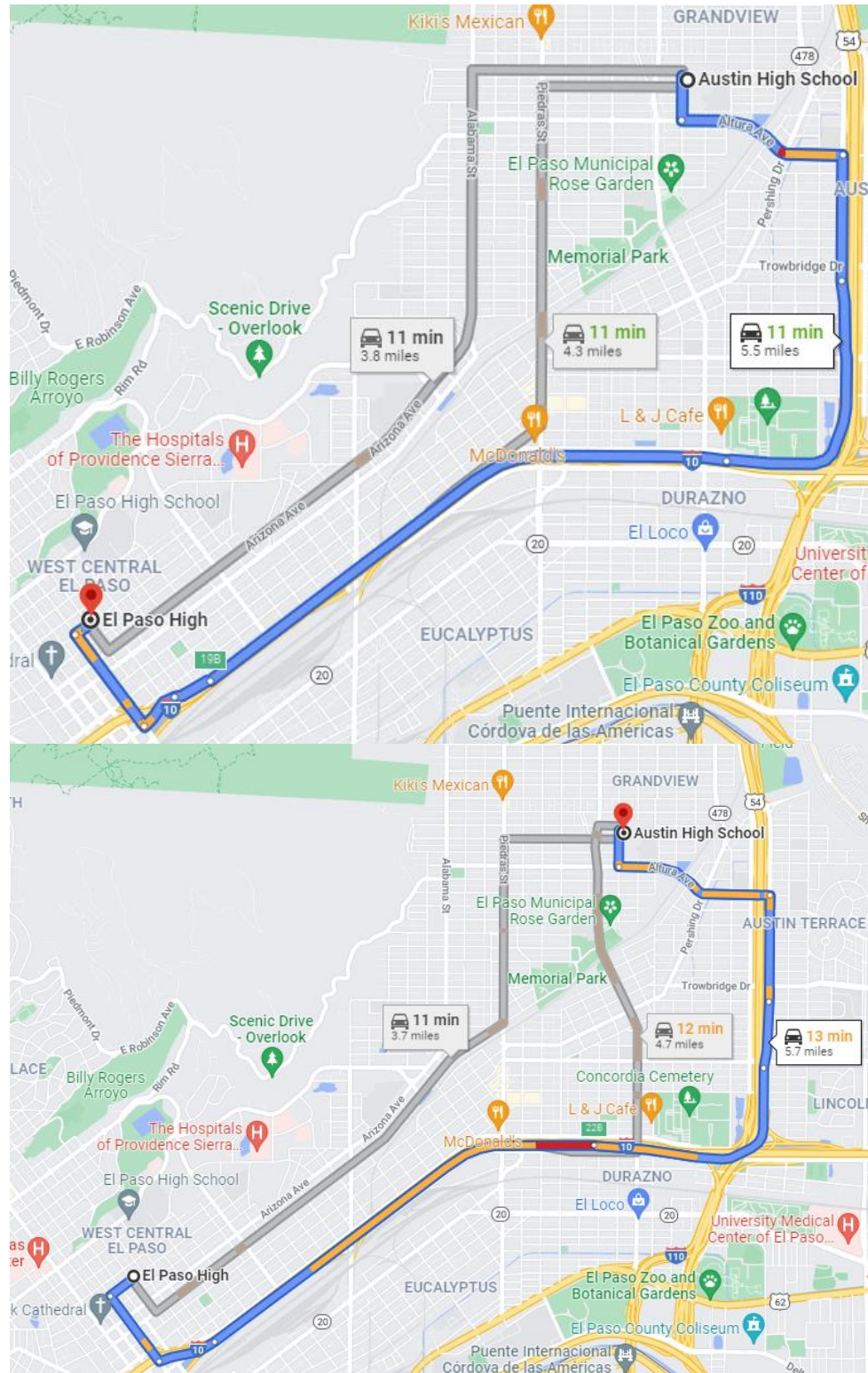
As shown in Figure 3, almost half of the trips are less than 10 miles in length. Less than 10% have length exceeding 20 miles.

Figure 3 shows the distribution from 26 ramps. Some of the ramps have a much higher proportion of very short trips. For example, 29% of the modeled trips entering I-10 westbound west of Copia Street are less than 5 miles in length, i.e. mostly traveling to the Downtown.

Many of these short trips are traveling out of their way to save a minute or two. If short trips could be removed from I-10, I-10 would be uncongested, even in peak traffic periods.

Figure 4 gives an example of how short local trips travel on I-10 today and how expansion could attract even more short local trips to I-10.

Figure 4: Afternoon Routing at 3:30 p.m. on Thursday, February 10, 2022



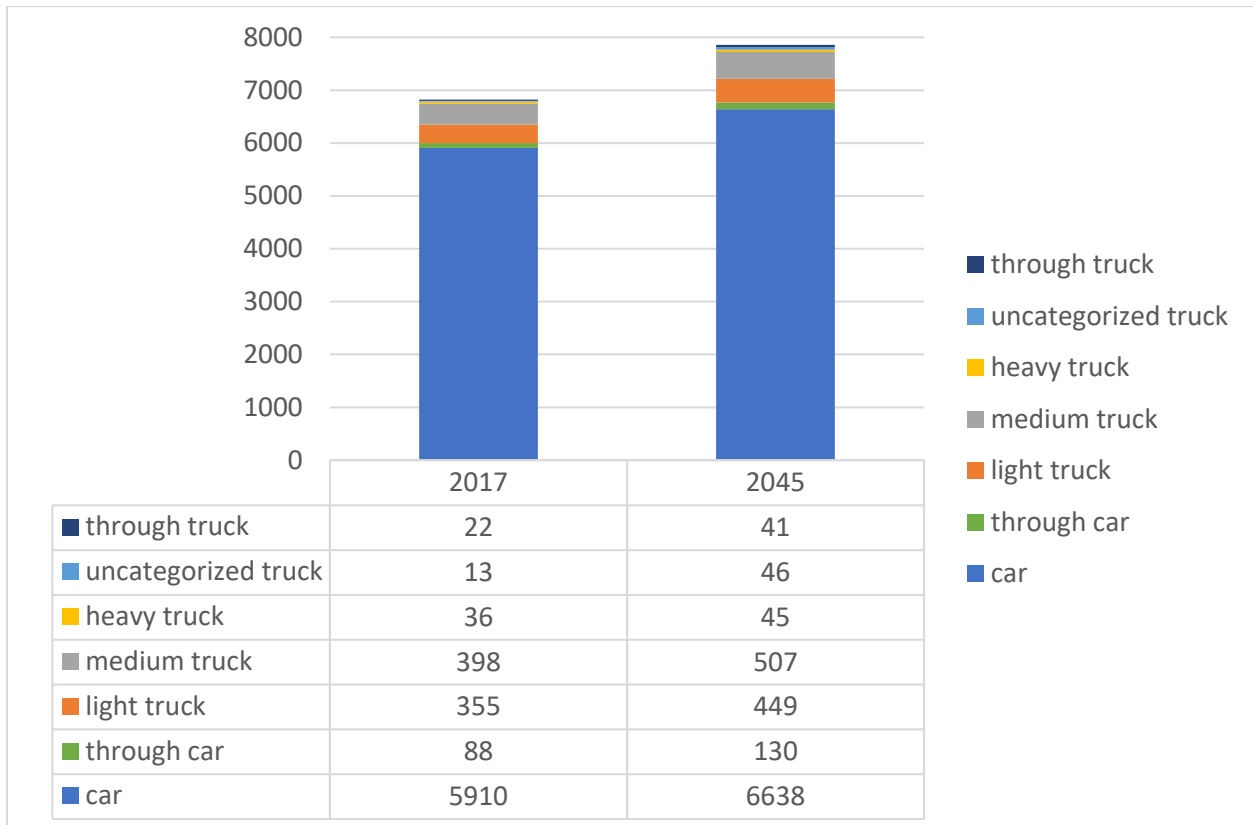
In the top figure, a trip from Austin High School to El Paso High School (westbound) takes an equal 11-minutes using US 54 and I-10 as on city streets despite the street route being 1.7 miles shorter. I-10 is uncongested westbound in the afternoon and many travelers will choose the I-10 route.

The bottom figure shows the reverse trip from El Paso High School to Austin High School (eastbound). There is significant congestion on I-10 (shown in red). The street route is 2 minutes faster and probably will be chosen by most travelers. This was at 3:30 p.m. and the difference likely would be greater in the 5 p.m. hour. However, if I-10 is expanded and becomes less congested, more local peak period trips will use I-10.

4 Trucks are not the problem

Figure 5 shows the modeled distribution of afternoon peak period traffic eastbound between Piedras and Copia. While the model shows a doubling of through trucks between 2017 and 2045, the 2045 number is still less than 1% of total traffic. Local heavy trucks are also less than 1% of total traffic. Cars and light trucks are 92% of total traffic in 2017 and 90% of total traffic in 2045.

Figure 5: Afternoon Peak Period Eastbound Piedras to Copia Modeled Traffic Classification



5 The TxDOT/El Paso MPO model speed and delay metrics are inaccurate, and the model exaggerates the benefits of freeway expansion

The MTP congestion metrics for the 2017 base year and the 2050 No-Build and Build alternatives are “Travel Time Index” and “PM Peak Hour Delay per Capita (mins)” (Table 5-11, p 5-22). Both metrics compare modeled congested travel time to an assumed uncongested travel time. For example, if a freeway segment has an assumed 60 mph travel time and a congested model speed of 30 mph, the travel time is twice as high as the uncongested travel time and the Travel Time Index for that segment for that period is 2.0.

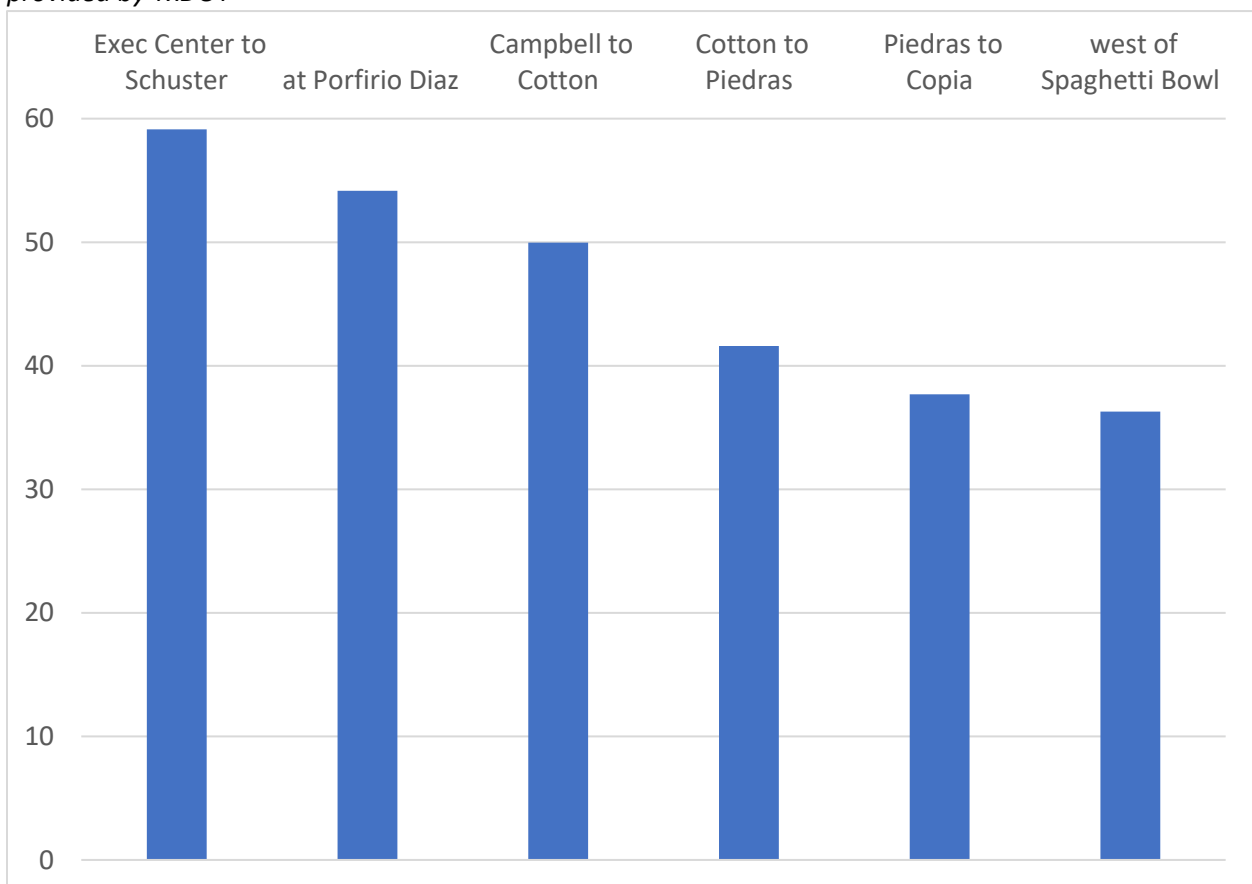
Delay is calculated similarly. Building on the example of a 60-mph uncongested speed and a 30-mph congested speed, and further assuming the segment is 1 mile long, the uncongested travel time is 1

minute, and the congested travel time is 2 minutes. The delay is 1 minute per vehicle or 1 hour for every 60 vehicles. If the volume is 6000, there are 100 vehicle hours of delay for that segment in that period.

Regional metrics are calculated by summing up thousands of separate calculations for each roadway segment in each period (morning peak 6:30 – 8:30 a.m., mid-day 8:30 a.m. – 2:30 p.m., afternoon peak 2:30 – 6:30 p.m. and overnight 6:30 p.m. to 6:30 a.m.)

The underlying model calculations for the road segments are inaccurate, so the aggregate measures are inaccurate. 24/7 speed data for I-10 have been collected from cell phones and other electronic devices. Relying on 2019 (pre-pandemic) speed data, the primary bottleneck on I-10 Segment 2 is eastbound in the afternoon peak period and begins in the Spaghetti Bowl (Segment 3) as shown in Figure 6.

Figure 6: 2019 Average Weekday Speed Afternoon Peak Period (2:30 – 6:30 p.m.) from 24/7 speed data provided by TxDOT



The data in Figure 6 suggests that eastbound traffic backs up west of the Spaghetti bowl in the weekday afternoon peak period but that the eastern end of Segment 2 is uncongested most days.

There is no similar bottleneck westbound in Segment 2 at any time of day. Traffic can slow down some in the afternoon peak period at the western end where a lane is dropped after Executive Center Boulevard, but this is localized and not as severe as eastbound bottleneck at the Spaghetti Bowl.

The model fails to match the actual speed data in the afternoon peak period as shown in Figure 7.

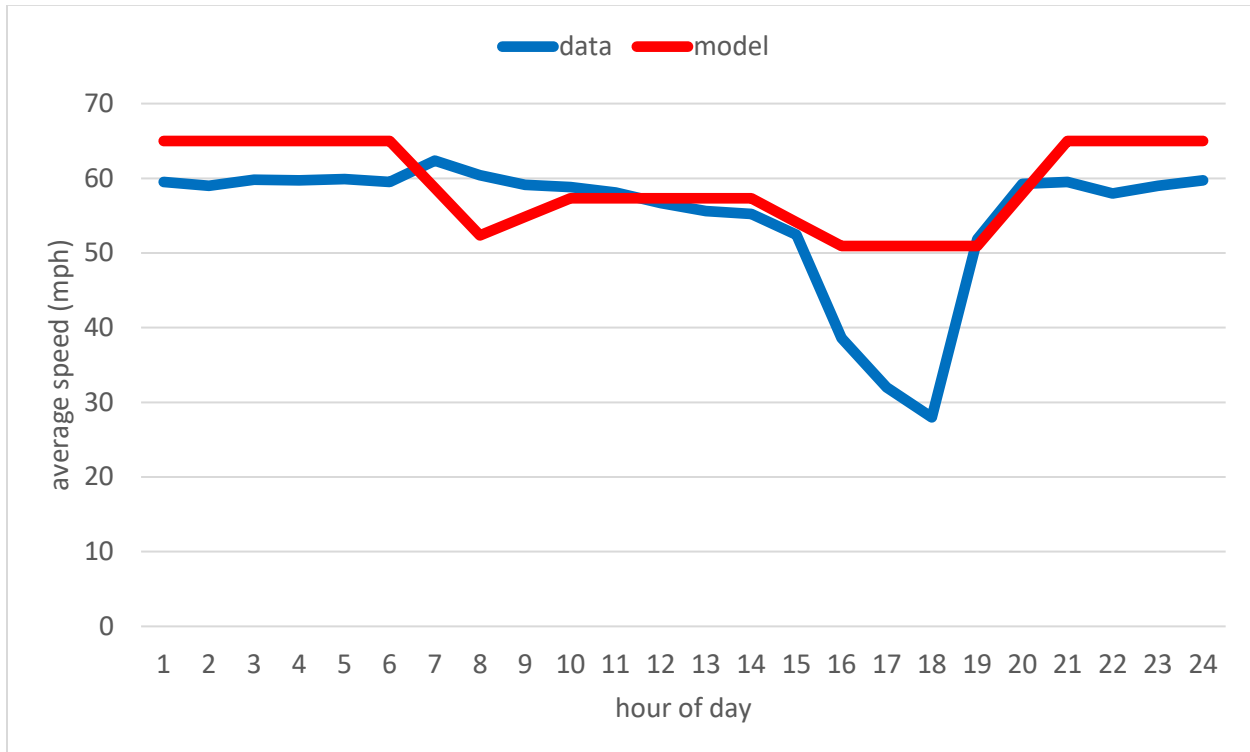
Figure 7: 2019 Afternoon Peak Period (2:30 – 6:30 p.m.) Speed vs. 2017 Base Year Model from 24/7 speed data provided by TxDOT



The model treats every segment as independent. Although the model correctly identifies the Spaghetti Bowl as the lowest-speed section, it fails to account for how this bottleneck affects upstream traffic flow and therefore overestimates the speed between Piedras and Copia. It also underestimates speeds that are less affected by bottlenecks including the west half of Segment 2.

Model speeds match data even more poorly across the 24-hour day as illustrated in Figure 8 for the I-10 eastbound between Piedras and Copia.

Figure 8: Piedras to Copia Eastbound 2019 Speed (24/7 data provided by TxDOT) vs. 2017 Base Year Model



Model errors shown in Figure 8 include:

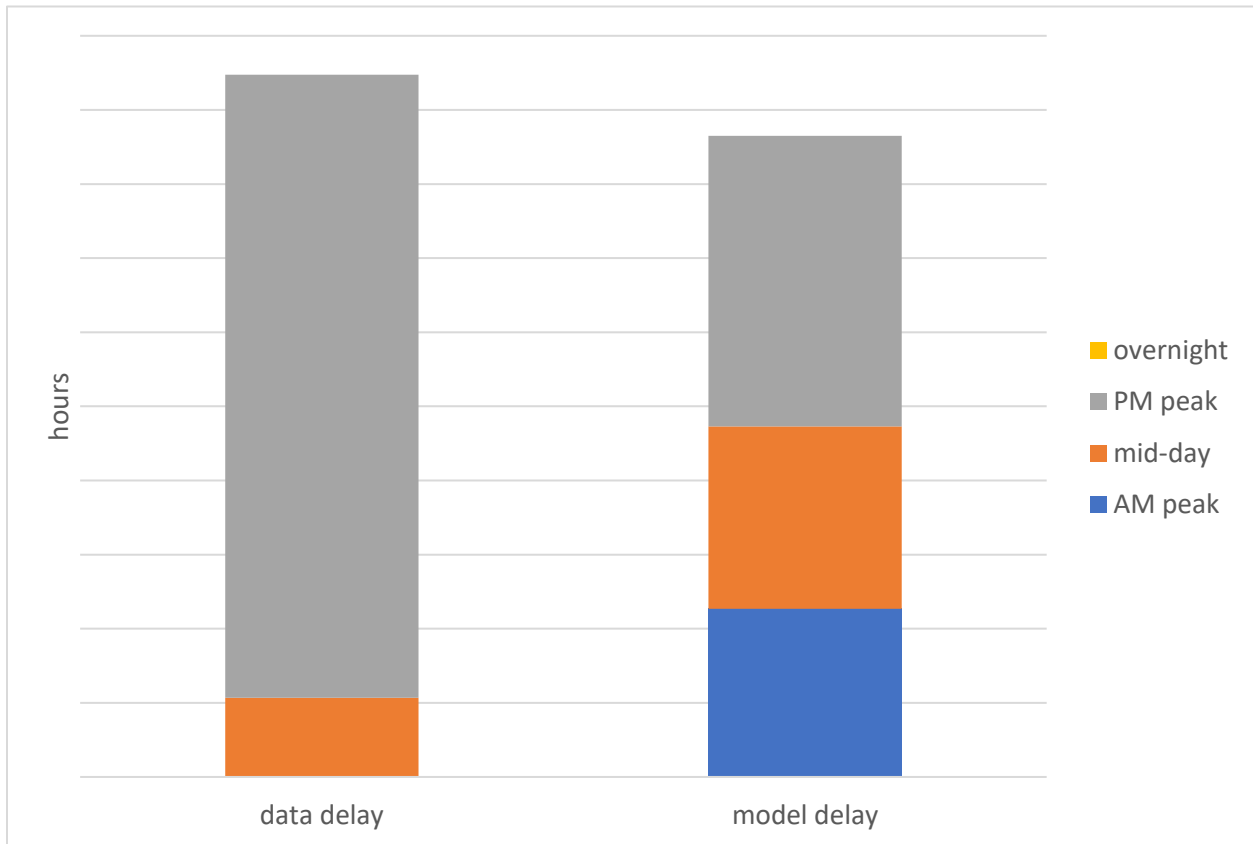
- overestimating overnight period (6:30 p.m. – 6:30 a.m.) model speeds as 65 mph when speeds really average 60 mph,
- showing a morning period (6:30 – 8:30 a.m.) speeds as lower than overnight speed when the data show no decline in speed and even a slight increase, and
- missing the afternoon effects of the Spaghetti Bowl bottleneck upstream in this segment.

Although the model speeds match the data best in the middle of the day (8:30 a.m. – 2:30 p.m.), the calculated delay from this period is still problematic because it is based on a 65-mph reference speed which is never achieved in this section of I-10 at any time of day.

Although the actual afternoon peak hour speed upstream of the Spaghetti Bowl bottleneck is lower than the modeled speed, it is incorrect to conclude that the model generally underestimates congestion. It overestimates congestion in some places and at some times, and underestimates congestion at other places and at other time. This makes the model unreliable for planning.

The actual uncongested average speed taken from the overnight period is 60 mph as illustrated in Figure 8. Using 60 mph rather than the 65-mph value assumed in the model and MTP delay calculations, there is little delay outside the PM peak period. Figure 9 compares delay based on actual speeds vs. delay as calculated in the model. The model incorrectly indicates that over half of the delay is outside the afternoon peak period, while greatly underestimating the afternoon peak period.

Figure 9: Afternoon Peak Period Delay Eastbound Piedras to Copia – Data (relative to 60 mph speed) vs. Model (relative to 65 mph speed), both multiplied by traffic volume



These delay calculation errors are caused by incorrectly treating successive road segments as independent. This modeling method, static traffic assignment or STA, was adopted 40 years ago when computers were less powerful than today's smart phones. In peak periods, traffic congestion is characterized by queues behind bottlenecks. In STA there are no queues behind bottlenecks. As documented above, this leads to the model predicting delay in the wrong places at the wrong times.

In my peer-reviewed journal article: *Forecasting the impossible: The status quo of estimating traffic flows with static traffic assignment and the future of dynamic traffic assignment*⁵, I document that STA cannot be relied on for planning in congested networks. The only solution is to replace STA with a more modern Dynamic Traffic Assignment (DTA) algorithm. This is practical today, especially for smaller and medium-sized regions, including the El Paso region I have made presentations at 3 national transportation conferences concerning the urgency for making these changes. I get no disagreement

⁵ <https://www.sciencedirect.com/science/article/pii/S2210539517301232?via%3Dihub>

and hear that the modelers will get around to this eventually. The larger Texas MPOs have control of their models; the El Paso MPO model is currently controlled by TxDOT.

6 Adverse impacts of urban freeway expansion are not adequately considered in the planning process

Property takings are a major impact of the proposed I-10 Downtown expansion that is well understood. There are other adverse impacts that are less well understood and analyzed.

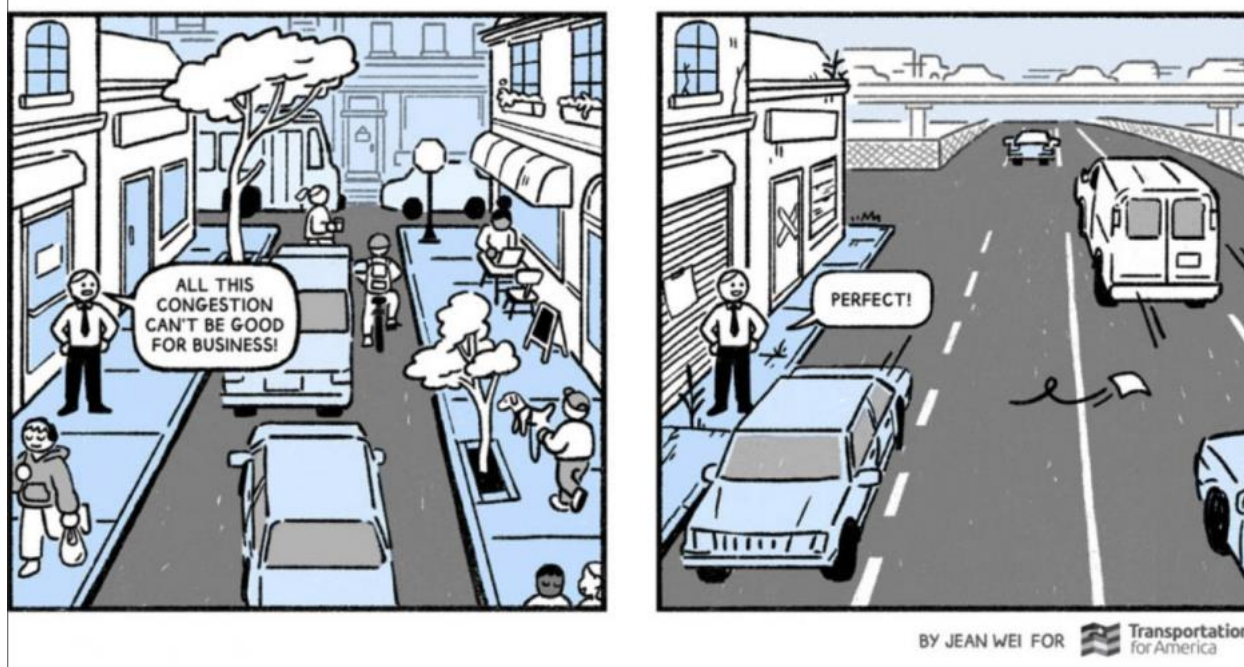
6.1 Congestion at street intersections caused by concentration of ramp traffic

In many cities, the most congested streets are those intersecting with freeway ramps. Freeway expansion often makes congestion worse in these areas, and these impacts generally are not considered in environmental analyses of freeway expansion.

6.2 Diverting traffic away from streets where traffic is the lifeblood of many businesses

Many businesses depend on pass-by traffic for visibility and for customers. When local traffic shifts to freeways, there are winners and losers. The losers are the businesses that are bypassed by the freeway. The winners are the businesses concentrated at freeway access points, which are often dominated by large chains.

Figure 10: Traffic is the Lifeblood of Many Businesses⁶



⁶ Wei, Jen, Transportation for America. <https://www.cnu.org/publicsquare/2022/02/11/solving-congestion-problem>

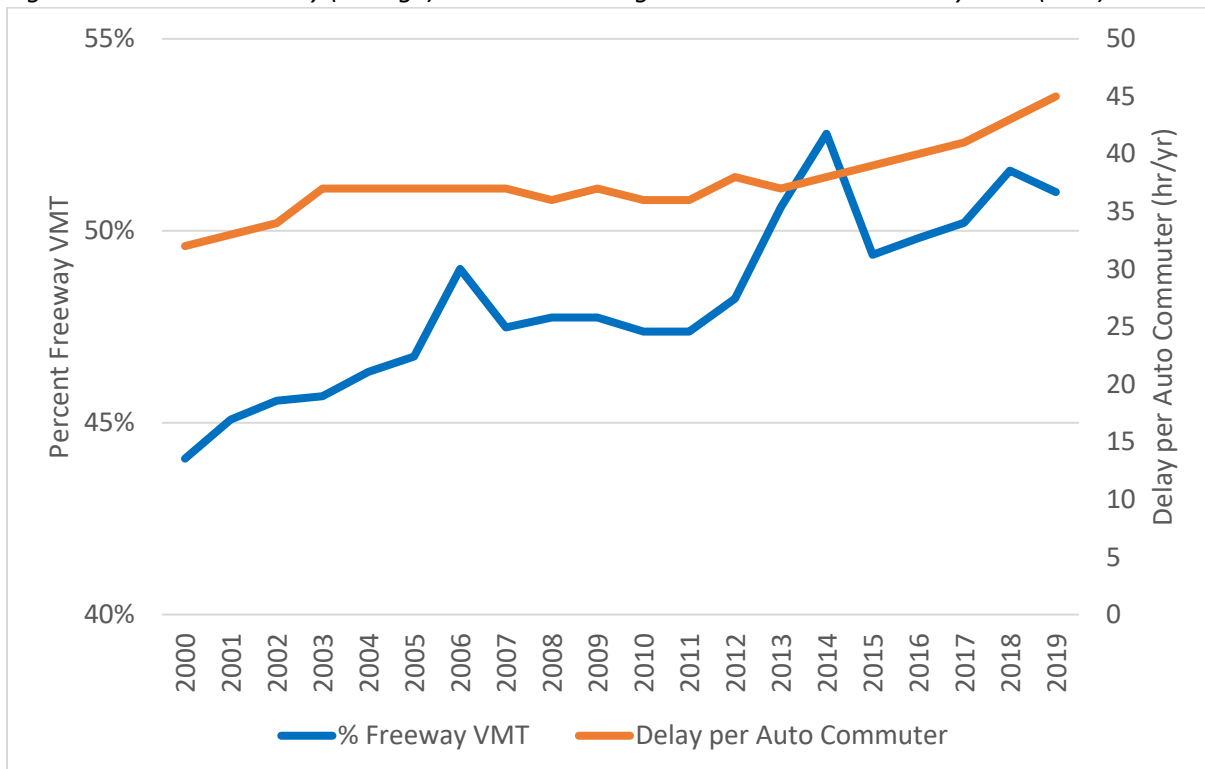
6.3 An unbalanced transportation investment strategy that worsens regional congestion in the long run

In statistical analysis of congestion data across 74 U.S. region, I found that the amount of freeway capacity in a region is unrelated to the amount of congestion. In contrast, the statistical analysis shows that more arterial street capacity strongly reduces congestion.⁷

To understand this critical difference between the congestion benefits of freeway and arterial street capacity, it is useful to return to Downs' discussion of triple convergence, and particularly to the element of shifting routes. Downs describes how drivers will choose "limited-access roads that are faster than local streets if they are not congested", but the attractiveness of such routes will cause them to become congested "to the point where they have no advantage over the alternate routes" (i.e., over arterial and local street routes).

Freeway expansion directs an increasing share of total traffic to freeways. However, because no trip begins or ends on a freeway, directing more traffic to freeways also creates bottlenecks on the local street system in the vicinity of the freeway access points. Data from the well-publicized Texas Transportation Institute (TTI) *Urban Mobility Report* for the El Paso region shows that as urban freeways have been widened, the share of traffic on freeways (blue line) has increased over the past 20 years, from about 43% to about 50% (including arterial roadways but excluding local streets).

Figure 11: Growth in Delay (Orange) Has Grown Along with Growth in % Freeway VMT (Blue)

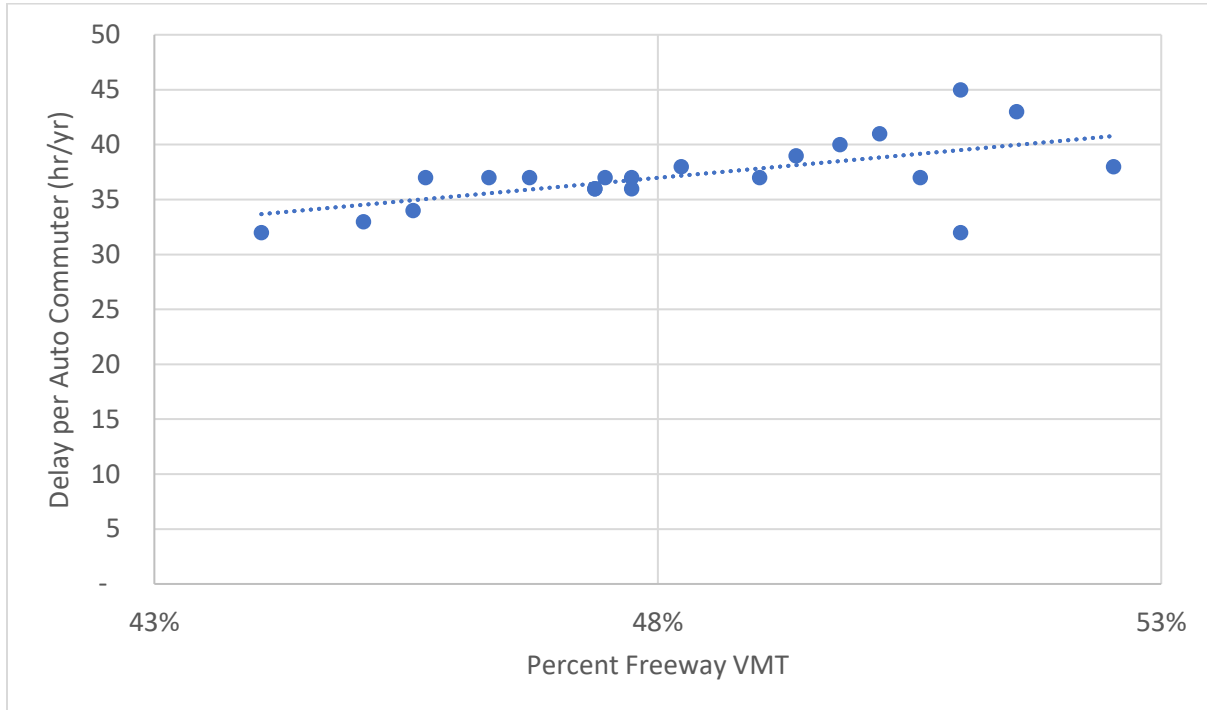


The "delay per auto commuter" (orange line) calculated by TTI has increased over this 20-year period as well. Sometimes, correlations of two variables growing over time are just correlations, but this one likely

⁷ Marshall, N. A Statistical Model of Regional Traffic Congestion in the United States 2016. <https://trid.trb.org/view/1392295>

is a causal relationship. **Simply put, freeway expansion causes congestion.** Figure 12 plots the delay per auto commuter as a function of the percent freeway VMT. As freeways are widened, the access points become increasingly congested, so widening freeways causes more peak-period congestion – the opposite of what is promised.

Figure 12: Freeway Expanses Causes Regional Delay



It is worth repeating a quote from The Congestion Con:

In an expensive effort to curb congestion in urban regions, we have overwhelmingly prioritized one strategy: we have spent decades and hundreds of billions of dollars widening and building new highways.

Total funding is limited and the singular focus on large highway expansion mega projects is accompanied by insufficient investment in the larger highway network, particularly in growth areas. The freeway expansion encourages decentralized land use, but the roadway network is insufficient in outlying areas to accommodate the growth. Therefore, freeway expansion causes more congestion when analyzed across the entire regional network.

The Shift Calculator estimates that each Interstate lane mile in the El Paso region will create:

- additional 3 to 4 million vehicle miles traveled (VMT) per year, and
- 198,000 more gallons of gasoline per year.⁸

The induced travel caused by a combination of factors including circuitous routes for local trips, choosing destinations farther away and more dispersed land use.

⁸ Rocky Mountain Institute. <https://shift.rmi.org/>

7 Downtown I-10 recommendations to minimize adverse impacts

The TxDOT/EI Paso MPO Draft MTP I-10 expansion plan is summarized in Table 1:

Table 1: I-10 Expansion Projects in the Draft MTP

Segment	From	To	General purpose	Adaptive/transit	Frontage roads	Cost (millions)	Year
1G	Thorn	Executive Center		+1		\$62	2041
2	Executive Center	Copia	+1	+1	+2	\$787	2027
3A	Copia	Paisano	+1	+1		\$319	2031
3B	Paisano	Airway	+1	+1		\$239	2033
3C	Airway	Yarbrough	+1	+1		\$433	2041
3D1	Yarbrough	Zaragoza	+1	+1		\$337	2041
3D2	Zaragoza	Eastlake	+1	+1		\$337	2037

These projects are not independent. When any section is widened, the traffic volume generally will increase on that section, and this often causes upstream and/or downstream bottlenecks on adjacent sections if they are not widened.

I am focusing on the Downtown project (Segment). The Purpose of the project as presented at the Downtown 10 Virtual Public Meeting #2 (February 24 – March 16, 2021) is:

- Improve mobility and long-term congestion management,
- Reduce conflict points and improve incident management, and
- Bring facility up to current design standards.

In developing an alternative design concept, I am considering these needs but also trying to minimize the adverse impacts discussed above.

The El Paso MPO has been unwilling to provide Draft MTP modeling files, so I have been unable to “look under the hood” to fully review the TxDOT/EI Paso MPO proposal in detail or to model other concepts using the same tool. However, I can make general recommendations including:

- 1) eliminate “transit-adaptive” lanes,
- 2) eliminate conversion of portions of Yandell Drive and Wyoming Avenue downtown to frontage roads,
- 3) create a street collector-distributor system that keeps many local trips off I-10, and
- 4) review the number of I-10 general-purpose lanes by section after making the other changes

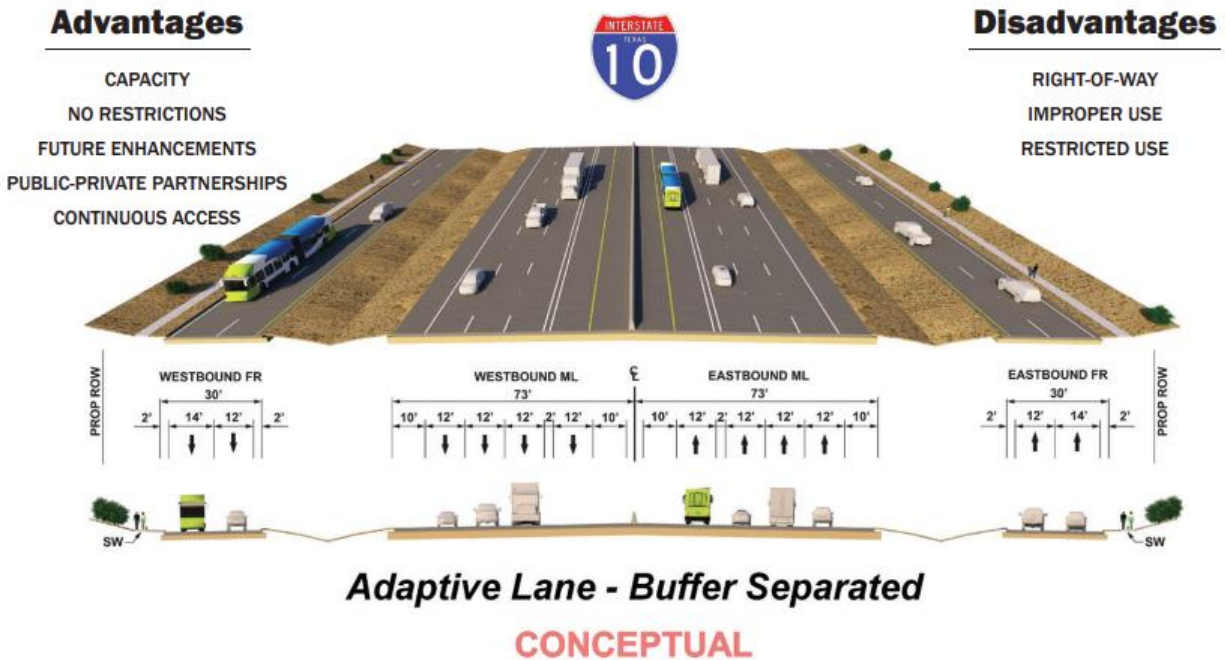
I have modeled a preliminary alternative that combines these elements using the 2045 TXDOT/EI Paso regional model. The results are promising. I will refine this alternative in the second phase of this project – hopefully using the 2050 MTP model.

7.1 Eliminate “transit-adaptive” lanes

The attributes of these “transit-adaptive” lanes are not described in the MTP. Figure 13 reproduces a TxDOT graphic showing adaptive lanes.

Figure 13: TxDOT Adaptive Lane Illustration

PROPOSED I-10 TYPICAL SECTION



The 2045 model includes only 5 bus routes that use I-10. This represents fewer than 10 buses per hour on any segment of I-10. Figure 13 shows only a single bus in the adaptive lanes but constructing these lanes cannot be justified solely for transit.

The other possible options are a) high-occupancy vehicle lanes (HOV), b) toll lanes, or c) a combination of (a) and (b) – high-occupancy toll lanes (HOT). As is documented above, there is little long-distance through traffic on I-10. Some of this long-distance travel is heavy trucks that almost certainly would be excluded from the adaptive lanes. For local traffic to use the adaptive lanes, vehicles would have to enter in the right-hand general-purpose lane, then weave across the other general-purpose lanes, and cross the 2-foot buffer to enter the adaptive lane. To exit, the vehicles would have to reverse this process. Figure 13 shows 3 general purpose lanes in each direction but the MTP plan for I-10 is significantly wider:

- 5 general-purpose lanes in each direction west of the Trench,
- 4 general-purpose lanes in each direction in the Trench, and
- 6 general-purpose lanes in each direction east of the Trench.

It wouldn't make sense for local travelers to cross all these lanes to enter and exit the adaptive lane unless the general-purpose lanes were very congested. But if the general-purpose lanes were very

congested, all this weaving would cause safety and operational problems, and drivers would need to begin the exit weaving process very early to be sure of being able to exit at the desired location.

Furthermore, a single adaptive lane is unattractive to travelers who are in a hurry because they are not confident that they won't get stuck behind a slow vehicle without being able to pass. For this reason, 2 managed lanes in each direction are generally constructed – often with direct connect flyover ramps at key locations to eliminate the weaving problems. In this case, it appears that neither 2 lanes in each direction or flyover ramps could be justified.

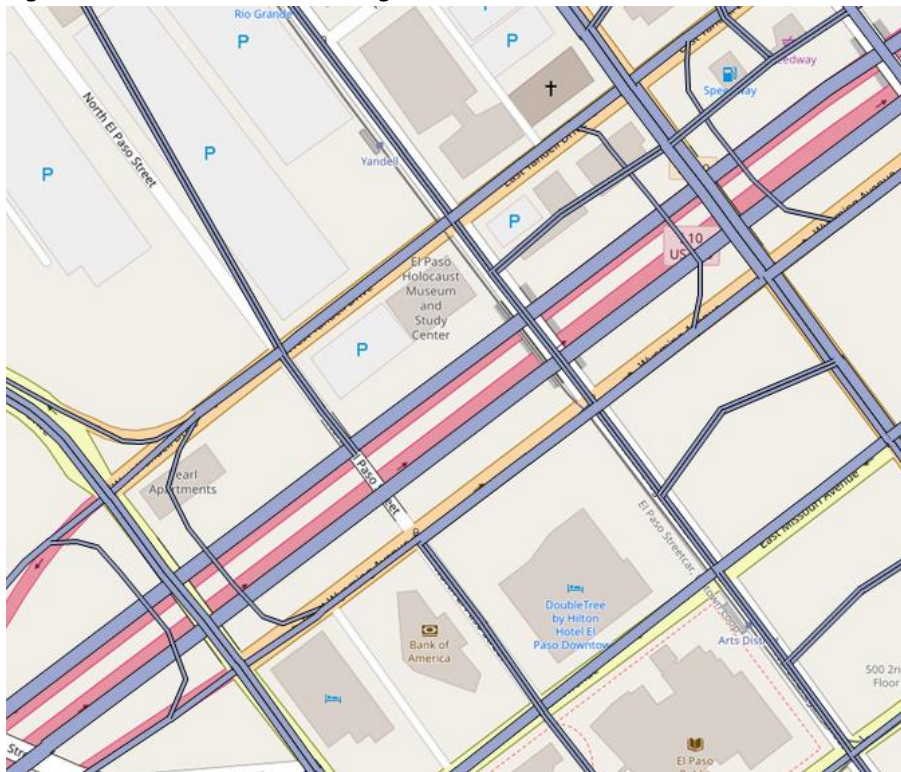
I recommend that these lanes be removed unless their value is clearly demonstrated.

7.2 Eliminate conversion of portions of Yandell Drive and Wyoming Avenue downtown to frontage roads

An Alternative H shapefile⁹ provided by TxDOT show continuous frontage roads including the conversion of portions of Yandell Drive and Wyoming Avenue to frontage roads downtown. In Alternative H, a central feature of these downtown frontage roads is median U-turn lanes (Figures 14 and 15).

These median U-turns will require a lot of property taking and likely are unnecessary. I recommend that these lanes be removed unless their value is clearly demonstrated.

Figure 14: Alternative H showing median U-turn lanes



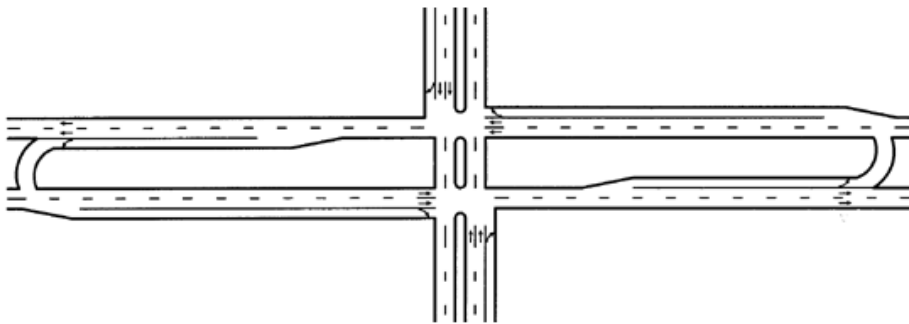
⁹ The TxDOT/El Paso MPO model uses TransCAD software. The shapefile was exported from TransCAD but does not include all of the information required by the TransCAD model for a simulation.

Figure 15 TxDOT description of median U-turn lanes

Median U-turns

The median U-turn intersection shifts left turns out of the intersection. Traffic wishing to turn left makes a U-turn in the median beyond the main intersection and then a right turn at the intersection. Eliminating the left turn at the main intersection simplifies signal timing and provides more green time and less congestion. Benefits include improved:

- Safety
- Mobility
- Connectivity
- Frontage road traffic flow



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Source: <http://www.my35.org/capital-median-u-turns.htm>

The frontage road conversion is not needed. Functionally, the frontage roads would just replace the two existing one-way streets. Frontage roads do not need have wider lanes or higher speed limits than these streets. The TxDOT *Roadway Design Manual* minimum design standards for urban frontage roads are 10-foot-wide lanes and a design speed of 30 mph.¹⁰ It is doubtful that the median U-turns are needed. The proposed conversion would cause a significant number of takings. It also is likely that the frontage roads would be over-designed and result in in higher-speed roads that would be dangerous for pedestrians.

The El Paso region is already especially unsafe for pedestrians. It is ranked the 20th worst out of the 100 largest metropolitan regions in the U.S. based on the number of pedestrian fatalities per capita ¹¹ This ranking is slightly higher than Houston (18th) but worse than San Antonio (28th) Dallas (31st) or Austin (46th). Reducing the number of fatalities in the El Paso region will require narrowing and slowing streets, and this proposed conversion in a part of the city with many pedestrians is a step in the wrong direction.

¹⁰ TxDOT *Roadway Design Manual*, July 1, 2020.

http://onlinemanuals.txdot.gov/txdotmanuals/rdw/manual_notice.htm

¹¹ Smart Growth America. Dangerous by Design 2021. <https://smartgrowthamerica.org/dangerous-by-design/>

7.3 Create a street collector-distributor system that keeps many local trips off I-10

Most states build few frontage roads in urban centers, instead letting the local street grid provide access to urban freeways. The emphasis on urban frontage roads in Texas exacerbates the problem of too much local traffic jumping on and off the freeways by providing too many access points. Freeways operate best with widely spaced ramps. The Transportation Research Board (TRB) has published *Guidelines for Ramp and Interchange Spacing*.¹² It recommends minimum interchange spacing of 2 to 3 miles in rural areas, based on operations and safety considerations, with a lower 1 mile minimum spacing in urban areas – trading off operations and safety somewhat given the greater pressure to provide access. The Texas urban frontage road model generally places ramps closer than a mile apart.

The best aspect of the version of the downtown “frontage roads” illustrated in Figure 14 is that it does not include this problem of too many ramps in a short space. Instead, the frontage roads operate as a collector-distributor system where local traffic exits the freeway at one end and then reconnects some distance beyond.

I recommend that this collector-distributor idea should be considered over a much longer distance to separate long-distance and local traffic as much as is practical. These should not be built to rural freeway standards. They should be built to urban design standards given in the National Association of City Transportation Officials (NACTO) *Urban Street Design Guide* and that was adopted by the City of El Paso “as the official design guidelines for the Capital Improvement Projects and other City funded street and roadway improvement projects within the City of El Paso” in 2014.¹³

I tested a preliminary alternative in the 2045 model that combines the recommended approaches described above including:

- No transit/adaptive lanes
- No added general-purpose lanes between Downtown and Spaghetti Bowl
- Converting frontage roads to collector-distributor streets between Downtown and east side of Spaghetti Bowl including filling in two missing links:
 - Eastbound east of Cotton Street (also in MTP)
 - Westbound connecting Gateway Boulevard through Spaghetti Bowl.
- Removing all 19 ramps between Downtown and the Spaghetti Bowl

The preliminary modeling results are promising. The modeled afternoon eastbound traffic is considerably lower than in the 2045 reference model, and even lower than the 2017 modeled volumes.

¹² Transportation Research Board. National Cooperative Highway Research Program (NHCRP) Report 687. Guidelines for Ramp and Interchange Spacing.

¹³ <https://nacto.org/wp-content/uploads/2015/06/ElPaso-UBDG-USDG-Resolution-5-20-14.pdf>

Figure 16: Afternoon Peak Period (2:30 – 6:30 p.m.) Modeled Traffic Volume Piedras to Colia

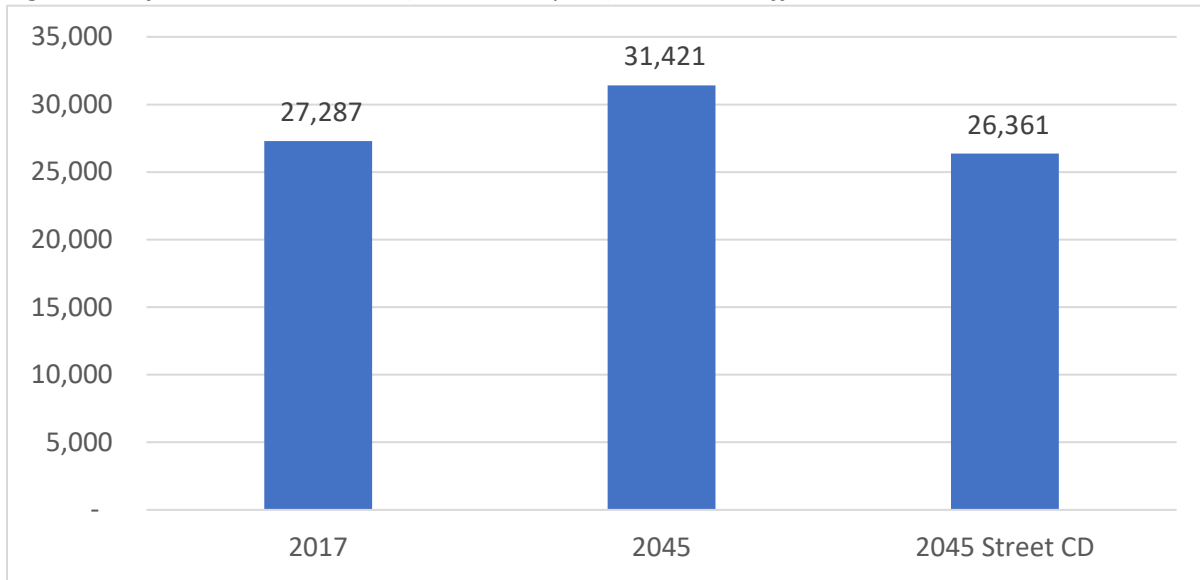
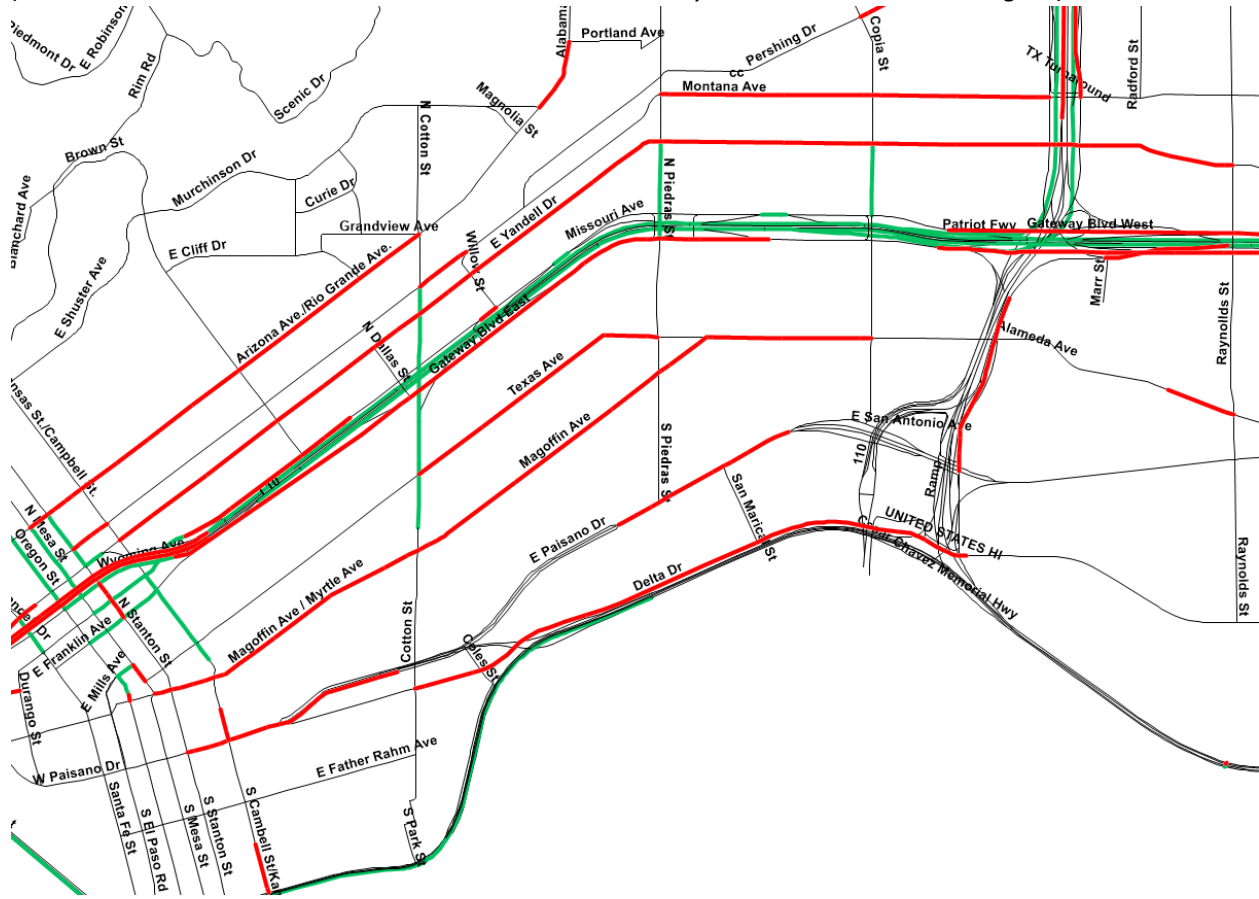


Figure 16 is based on the differences between the 2045 amended MTP model and a 2045 Street CD alternative model. The segments colored green (including I-10) have modeled traffic volumes that are lower by 1000 vehicles or more across the 4-hour afternoon peak period (2:30 – 6:30 p.m.) Traffic also would be lower on Cotton Street, Piedras Street and Copia Street in the vicinity of I-10 which could relieve congestion in these areas. The links that are colored red have traffic volumes that are higher than 1000 vehicles or more across the 4-hour period. As shown in the figure, the diverted traffic is spread across multiple east-west streets. These streets appear to have adequate capacity, and additional traffic would help some businesses along these streets. Interestingly, the traffic volumes along the eastbound and westbound collector-distributor streets (i.e., Gateway Boulevard) are not particularly high because other parallel streets offer more direct routes for many local trips.

Figure 17: Afternoon Peak Period (2:30 – 6:30 p.m.) Modeled Traffic Volume Differences Piedras to Copia (Green = 1000+ Lower With Street Collector-Distribution System and Red = 1000+ Higher)



8 Remaining Work

In the final phase of this project, I will refine this alternative and do a more complete evaluation. I will consider the need for adding general purpose lanes and I also will look at extending the street collector-distributor concept to the west of downtown.

It would be most useful for everyone, including the El Paso MPO and TxDOT, to do these analyses with the 2050 MTP model rather than the outdated 2045 model.

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EDUCATION:

Master of Science in Engineering Sciences, Dartmouth College, Hanover, NH, 1982-----

Bachelor of Science in Mathematics, Worcester Polytechnic Institute, Worcester, MA,
1977

PROFESSIONAL EXPERIENCE: (34 Years, 20 at Smart Mobility, Inc.)

Norm Marshall helped found Smart Mobility, Inc. in 2001. Prior to this, he was at RSG for 14 years where he developed a national practice in travel demand modeling. He specializes in analyzing the relationships between the built environment and travel behavior and doing planning that coordinates multi-modal transportation with land use and community needs.

Regional Land Use/Transportation Scenario Planning

Envision Central Texas Vision (5-county region)—implemented many enhancements in regional model including multiple time periods, feedback from congestion to trip distribution and mode choice, new lifestyle trip production rates, auto availability model sensitive to urban design variables, non-motorized trip model sensitive to urban design variables, and mode choice model sensitive to urban design variables and with higher values of time (more accurate for “choice” riders). Analyzed set land use/transportation scenarios including developing transit concepts to match the different land use scenarios.

Portland Area Comprehensive Transportation System (PACTS) – the Portland Maine Metropolitan Planning Organization. Updating regional travel demand model with new data (including AirSage), adding a truck model, and multiclass Dynamic Traffic Assignment (DTA) including differentiation between cash toll and transponder payments.

Loudoun County Virginia Dynamic Traffic Assignment – Enhanced subarea travel demand model to include Dynamic Traffic Assignment (Cube). Model being used to better understand impacts of roadway expansion on induced travel.

Vermont Agency of Transportation-Enhanced statewide travel demand model to evaluate travel impacts of closures and delays resulting from severe storm events. Model uses innovate Monte Carlo simulations process to account for combinations of failures.

California Air Resources Board – Led team including the University of California in \$250k project that reviewed the ability of the new generation of regional activity-based models and land use models to accurately account for greenhouse gas emissions from alternative scenarios including more compact walkable land use and roadway pricing. This work included hands-on testing of the most complex travel demand models in use in the U.S. today.

Climate Plan (California statewide) – Assisted large coalition of groups in reviewing and participating in the target setting process required by Senate Bill 375 and administered by the

California Air Resources Board to reduce future greenhouse gas emissions through land use measures and other regional initiatives.

Chittenden County (2060 Land use and Transportation Vision Burlington Vermont region) – led extensive public visioning project as part of MPO’s long-range transportation plan update.

Flagstaff Metropolitan Planning Organization – Implemented walk, transit and bike models within regional travel demand model. The bike model includes skimming bike networks including on-road and off-road bicycle facilities with a bike level of service established for each segment.

Chicago Metropolis Plan and Chicago Metropolis Freight Plan (6-county region)— developed alternative transportation scenarios, made enhancements in the regional travel demand model, and used the enhanced model to evaluate alternative scenarios including development of alternative regional transit concepts. Developed multi-class assignment model and used it to analyze freight alternatives including congestion pricing and other peak shifting strategies.

Municipal Planning

City of Grand Rapids – Michigan Street Corridor – developed peak period subarea model including non-motorized trips based on urban form. Model is being used to develop traffic volumes for several alternatives that are being additionally analyzed using the City’s Synchro model

City of Omaha – Modified regional travel demand model to properly account for non-motorized trips, transit trips and shorter auto trips that would result from more compact mixed-use development. Scenarios with different roadway, transit, and land use alternatives were modeled.

City of Dublin (Columbus region) – Modified regional travel demand model to properly account for non-motorized trips and shorter auto trips that would result from more compact mixed-use development. The model was applied in analyses for a new downtown to be constructed in the Bridge Street corridor on both sides of an historic village center.

City of Portland, Maine – Implemented model improvements that better account for non-motorized trips and interactions between land use and transportation and applied the enhanced model to two subarea studies.

City of Honolulu – Kaka’ako Transit Oriented Development (TOD) – applied regional travel demand model in estimating impacts of proposed TOD including estimating internal trip capture.

City of Burlington (Vermont) Transportation Plan – Led team that developing Transportation Plan focused on supporting increased population and employment without increases in traffic by focusing investments and policies on transit, walking, biking and Transportation Demand Management.

Transit Planning

Regional Transportation Authority (Chicago) and Chicago Metropolis 2020 – evaluated alternative 2020 and 2030 system-wide transit scenarios including deterioration and enhance/expand under alternative land use and energy pricing assumptions in support of initiatives for increased public funding.

Capital Metropolitan Transportation Authority (Austin, TX) Transit Vision – analyzed the regional effects of implementing the transit vision in concert with an aggressive transit-oriented development plan developed by Calthorpe Associates. Transit vision includes commuter rail and BRT.

Bus Rapid Transit for Northern Virginia HOT Lanes (Breakthrough Technologies, Inc and Environmental Defense.) – analyzed alternative Bus Rapid Transit (BRT) strategies for proposed privately-developing High Occupancy Toll lanes on I-95 and I-495 (Capital Beltway) including different service alternatives (point-to-point services, trunk lines intersecting connecting routes at in-line stations, and hybrid).

Roadway Corridor Planning

I-30 Little Rock Arkansas – Developed enhanced version of regional travel demand model that integrates TransCAD with open source Dynamic Traffic Assignment (DTA) software, and used to model I-30 alternatives. This model models freeway bottlenecks much more accurately than the base TransCAD model.

South Evacuation Lifeline (SELL) – In work for the South Carolina Coastal Conservation League, used Dynamic Travel Assignment (DTA) to estimate evaluation times with different transportation alternatives in coastal South Carolina including a new proposed freeway.

Hudson River Crossing Study (Capital District Transportation Committee and NYSDOT) – Analyzing long term capacity needs for Hudson River bridges which a special focus on the I-90 Patroon Island Bridge where a microsimulation VISSIM model was developed and applied.

PUBLICATIONS AND PRESENTATIONS (partial list)

DTA Love: Co-leader of workshop on Dynamic Traffic Assignment at the June 2019 Transportation Research Board Planning Applications Conference.

Forecasting the Impossible: The Status Quo of Estimating Traffic Flows with Static Traffic Assignment and the Future of Dynamic Traffic Assignment. *Research in Transportation Business and Management* 2018.

Assessing Freeway Expansion Projects with Regional Dynamic Traffic Assignment. Presented at the August 2018 Transportation Research Board Tools of the Trade Conference on Transportation Planning for Small and Medium Sized Communities.

Vermont Statewide Resilience Modeling. With Joseph Segale, James Sullivan and Roy Schiff. Presented at the May 2017 Transportation Research Board Planning Applications Conference.

Assessing Freeway Expansion Projects with Regional Dynamic Traffic Assignment. Presented at the May 2017 Transportation Research Board Planning Applications Conference.

Pre-Destination Choice Walk Mode Choice Modeling. Presented at the May 2017 Transportation Research Board Planning Applications Conference.

A Statistical Model of Regional Traffic Congestion in the United States. Presented at the 2016 Annual Meeting of the Transportation Research Board.

MEMBERSHIP/AFFILIATIONS

Associate Member, Transportation Research Board (TRB)

Member and Co-Leader Project for Transportation Modeling Reform, Congress for the New Urbanism (CNU)



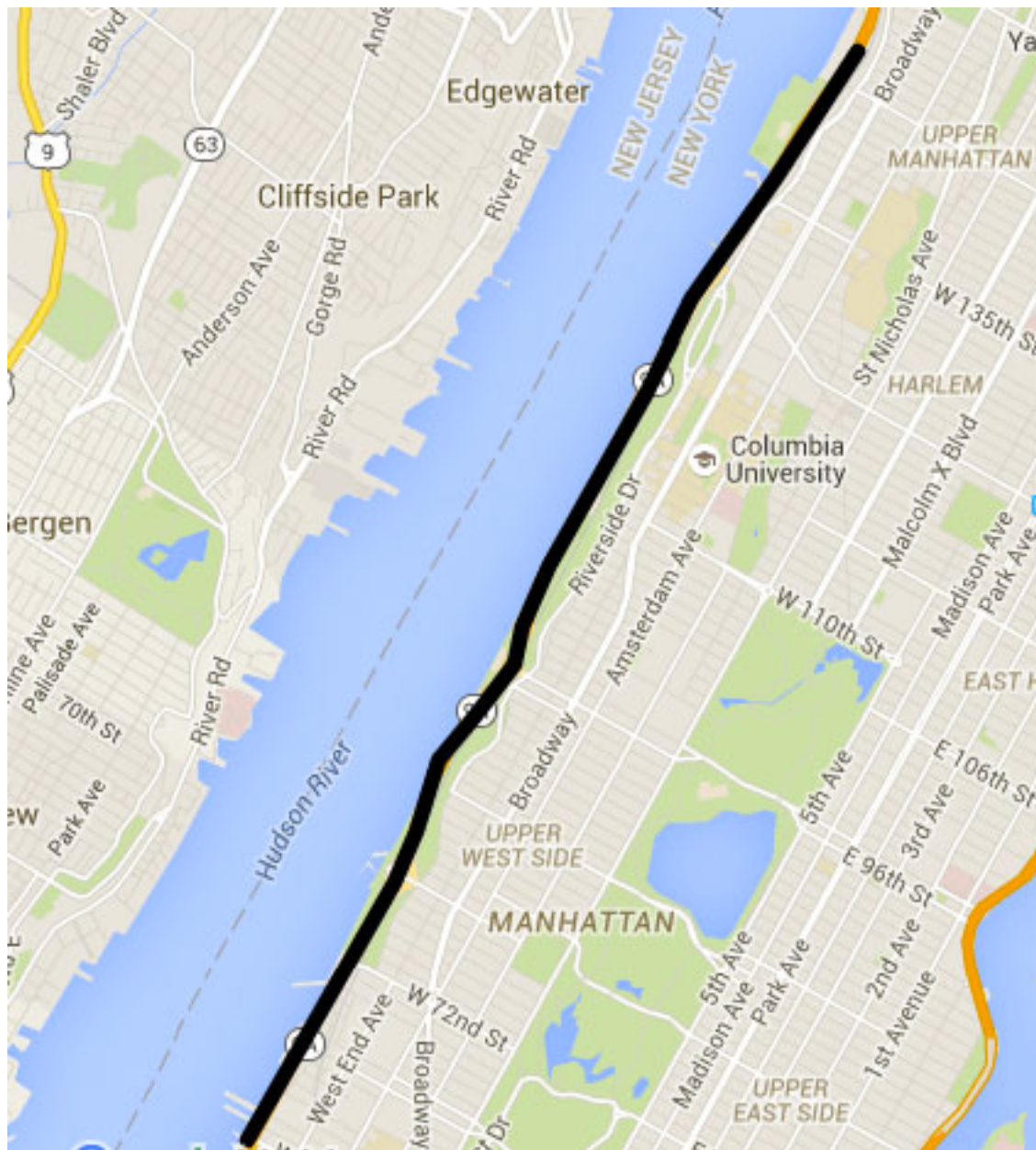
Interstates/Highways to Boulevards Research

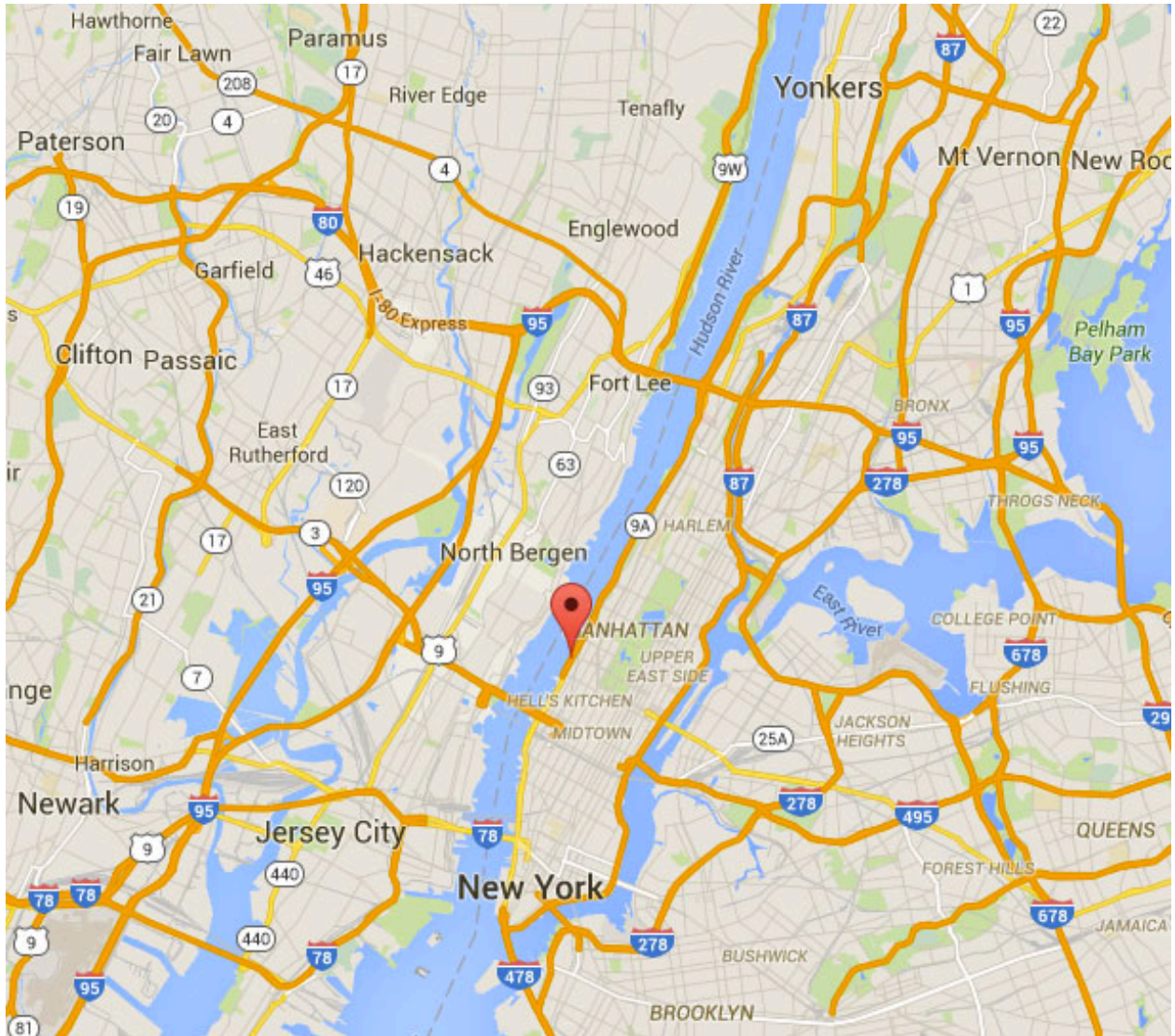
The CoPIRG Foundation and groups counter to the widening of the Central 70 project have referenced highway-to-boulevard conversions in their argument for urban freeway removal. Below are examples of highways that have been converted to boulevards or removed, as well as projects that are under debate and have not been removed.

Frequently used examples of highway conversions:

West Side Elevated Highway – New York, NY

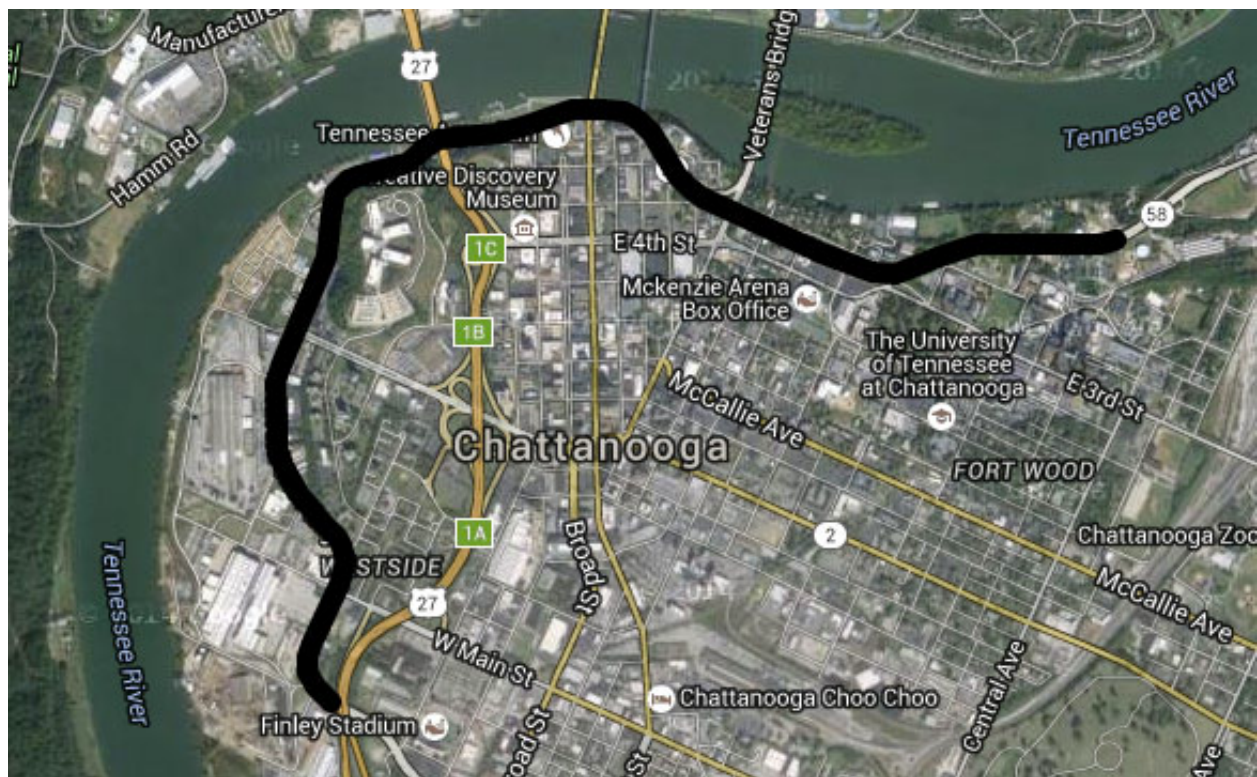
- **Connections at each end:** South: I-478 in Manhattan; North: NY 9A in Manhattan, NY
- **Interstate before conversion?** No
- **Length:** 5.29 miles
- **Lanes:** Six
- **Traffic:** 80,000 daily vehicles
- **Status:** Highway removed due to collapse in 1973 and converted to wide boulevard
 - Lanes were considered too narrow could not accommodate trucks
- Traffic engineers found that traffic dissipated after removal

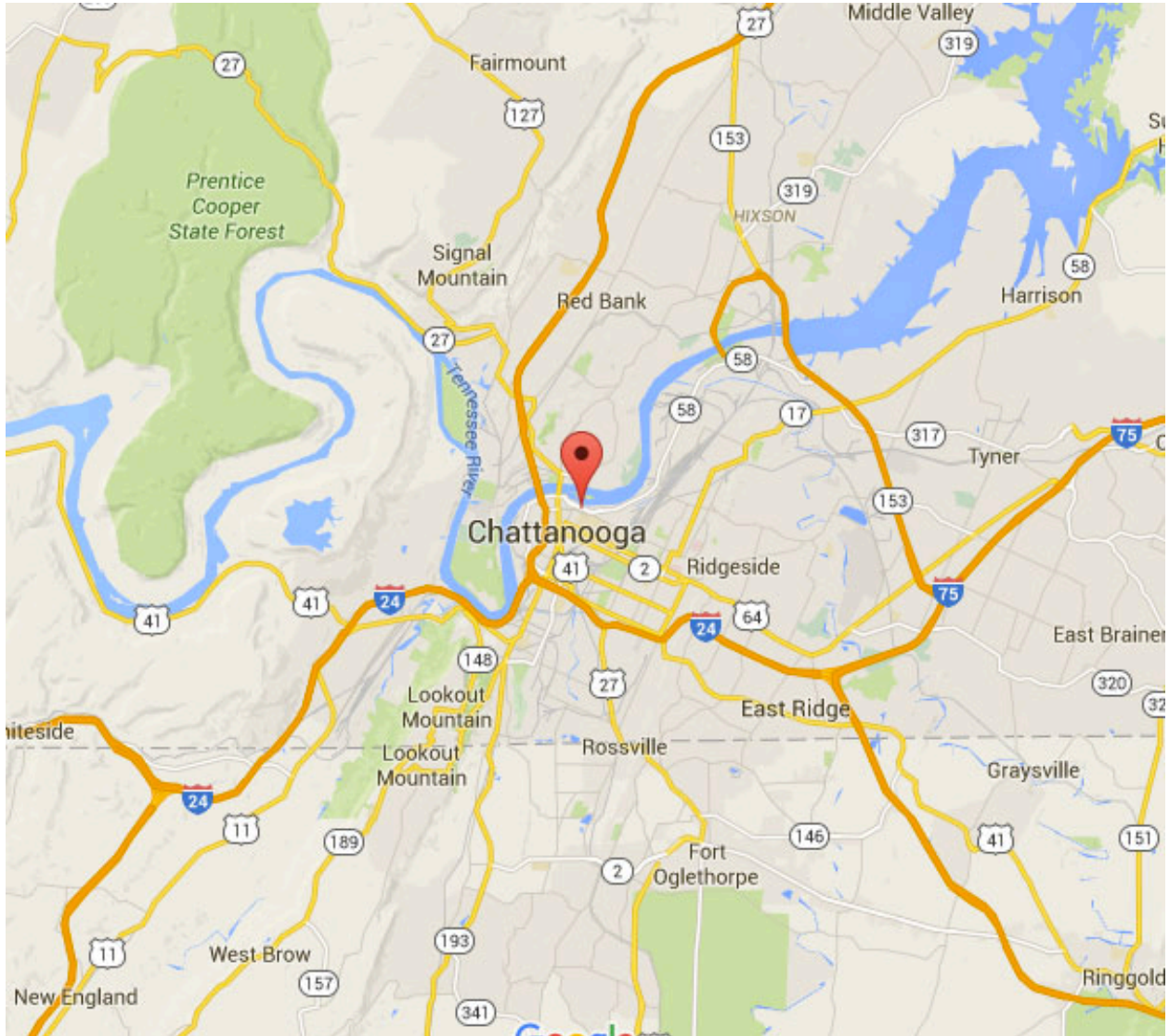




Riverfront Parkway - Chattanooga, TN

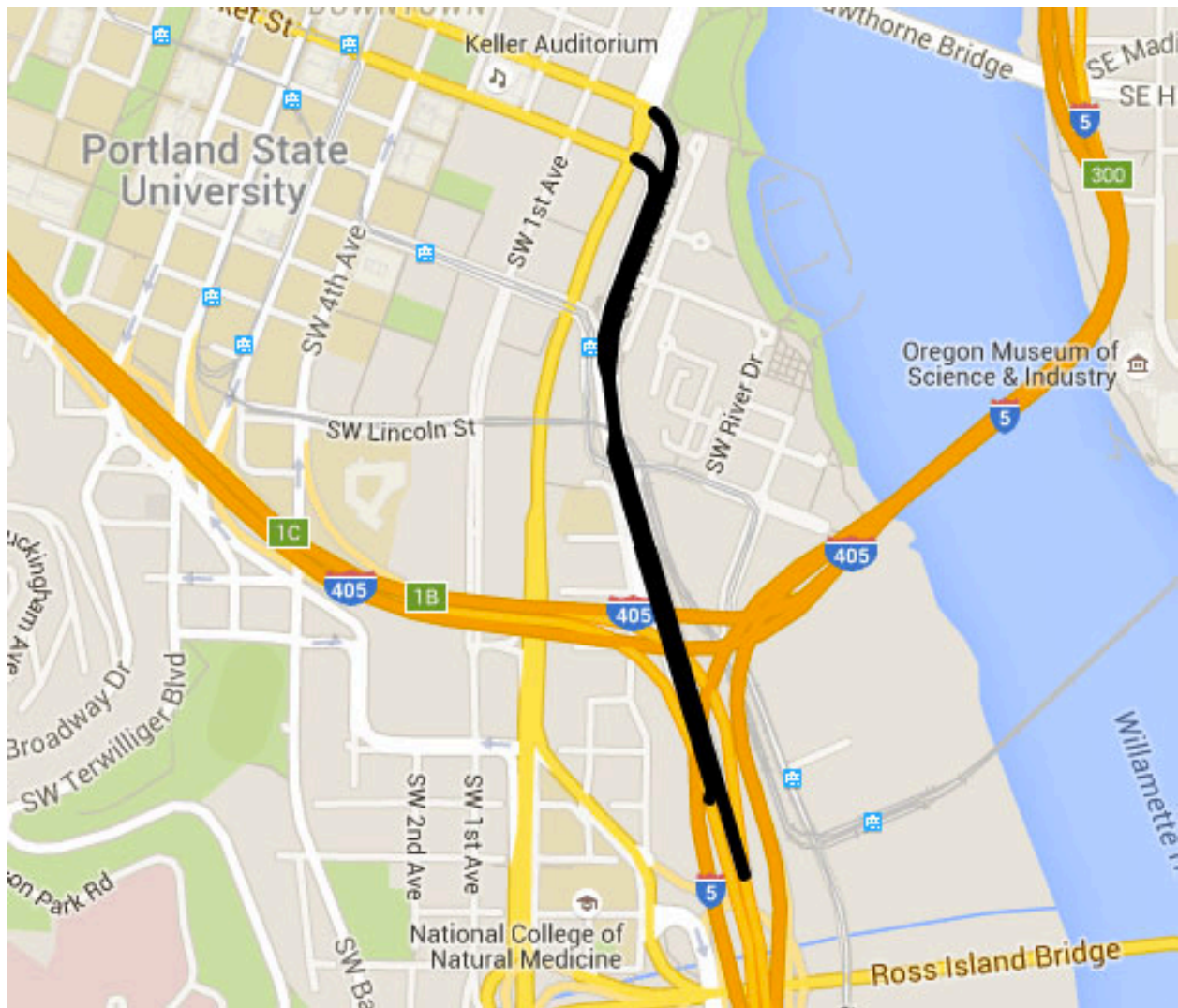
- **Connections at each end:** Runs from Riverside Dr. to W 20 St.
- **Interstate before conversion?** No
- **Length:** 3 miles
- **Lanes:** Four
- **Traffic:** 20,000 daily vehicles
- **Status:** Highway replaced with boulevard to better use space in early 2000s
 - Highway was built in 1960s

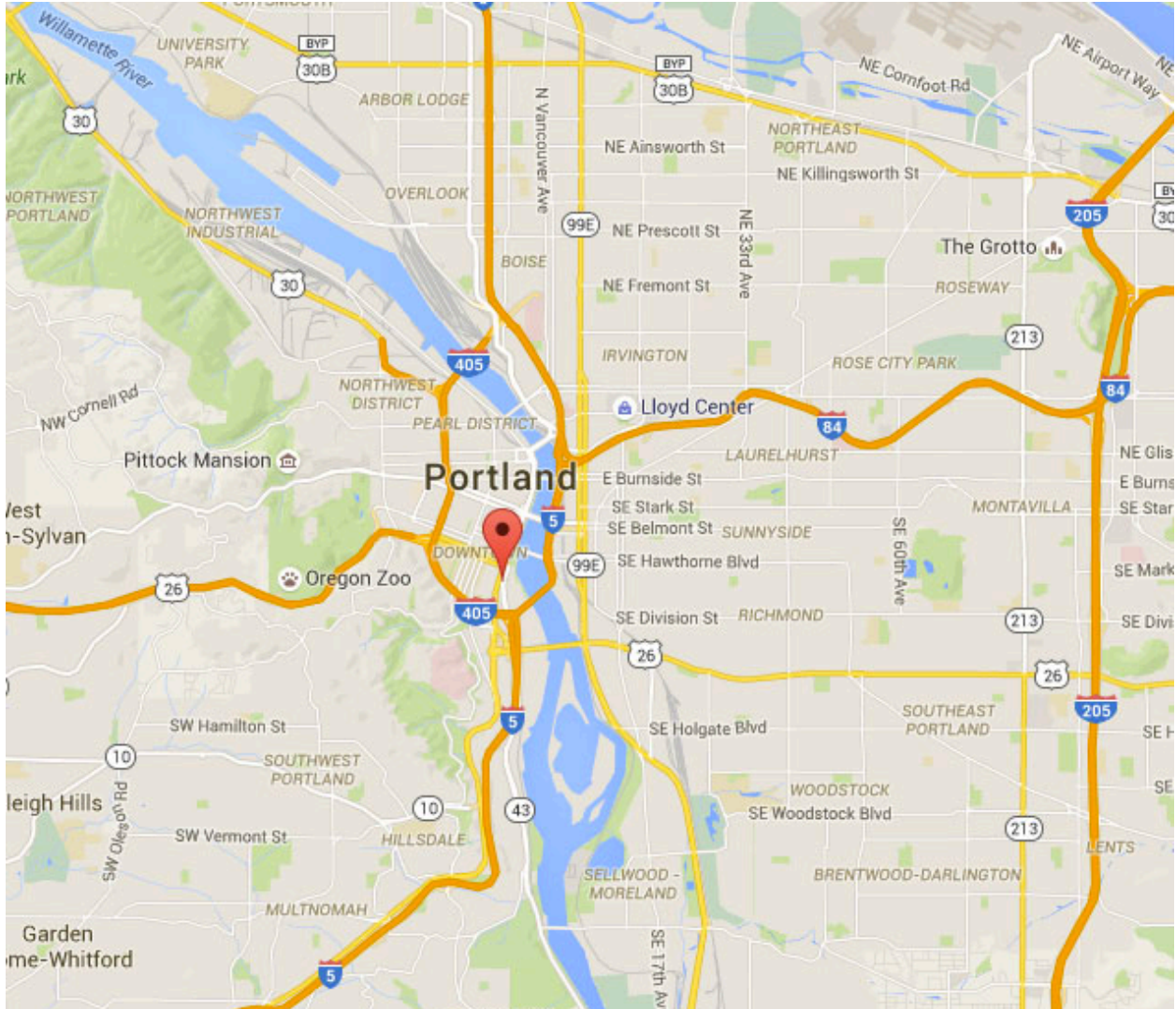




Harbor Drive - Portland, OR

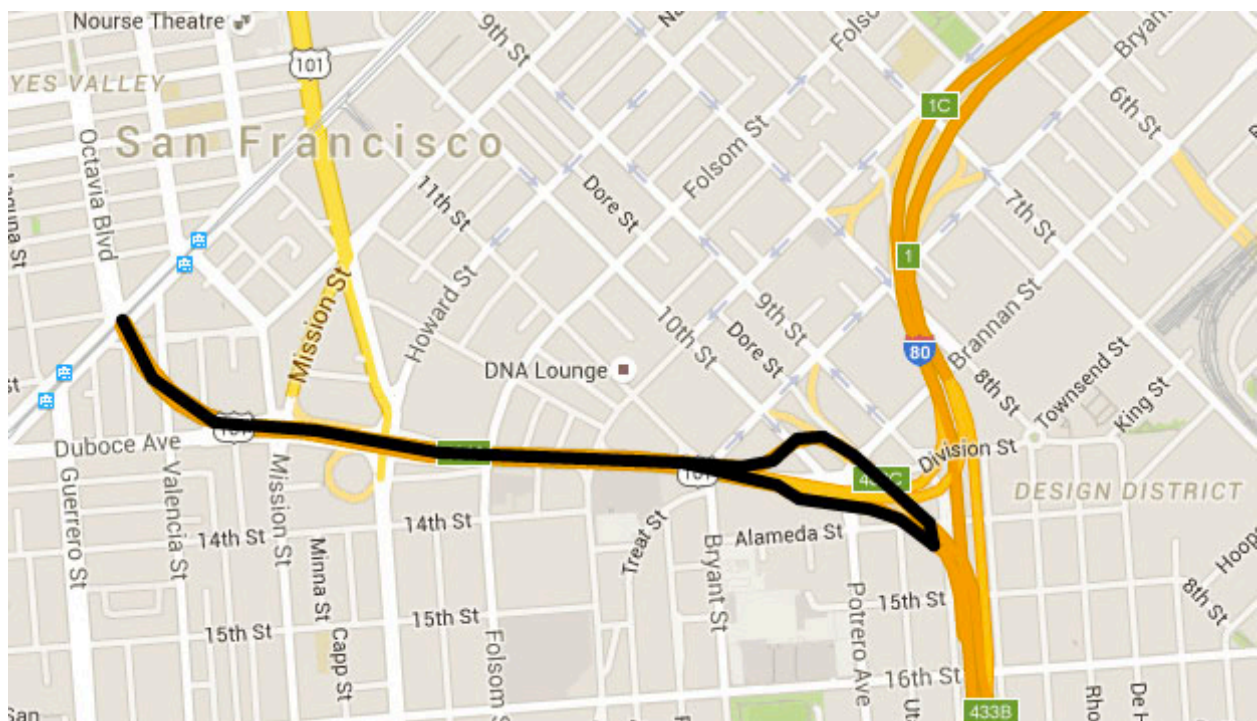
- **Connections at each end:** Connected US 99W to downtown Portland along the western bank of the Willamette River
- **Interstate before conversion?** No
- **Length:** 3 miles
- **Lanes:** Four
- **Traffic:** 24,000 daily vehicles
- **Status:** Permanently closed in 1974 for construction of new park
 - As more freeways were built in the city during the 1960s--including Interstate 5 on the eastern bank of the Willamette and Interstate 405, a western bypass around downtown--Harbor Drive became less important as a long-haul freeway route

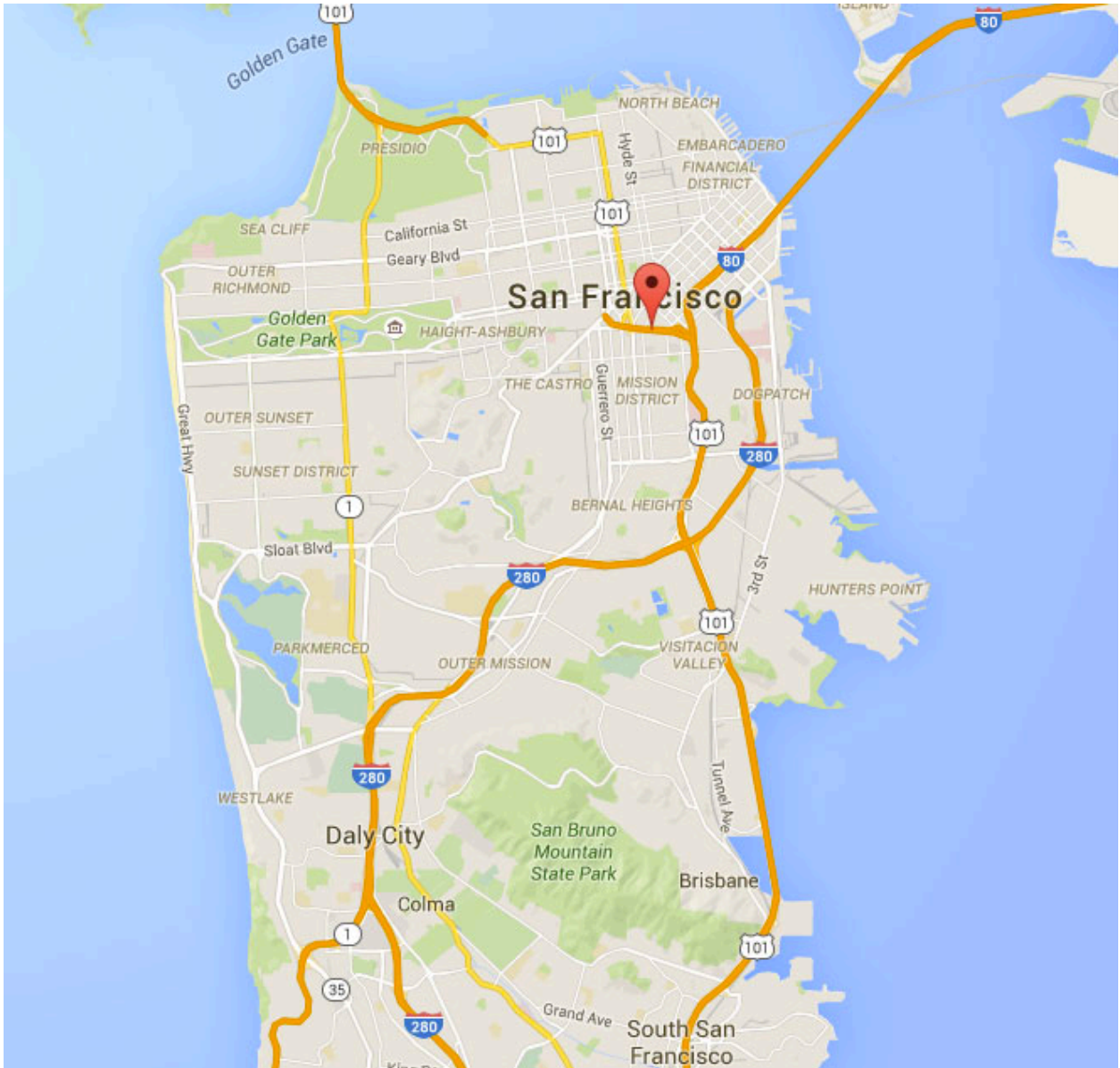




Central Freeway – San Francisco, CA

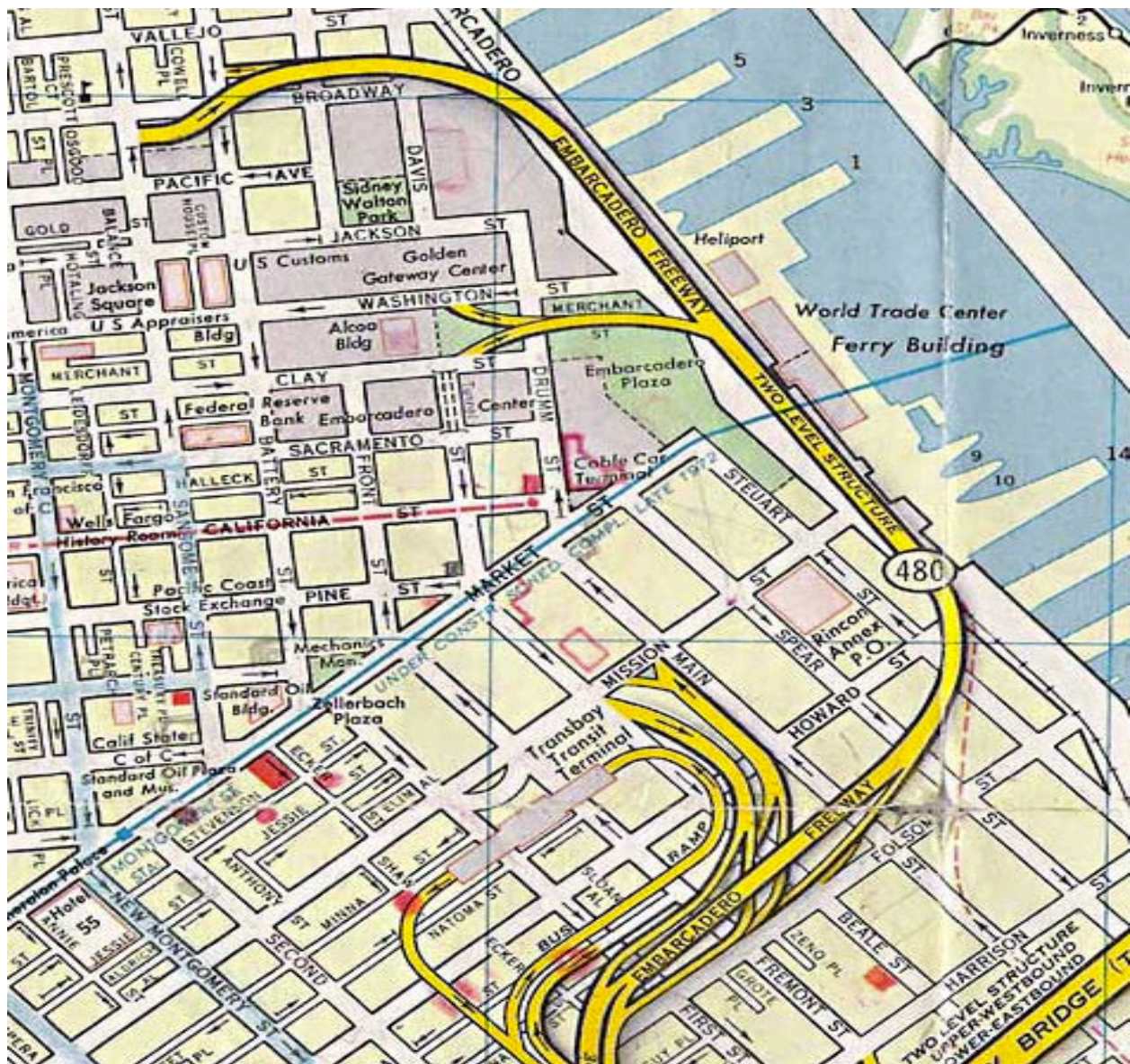
- **Connections at each end:** Connected Bayshore Freeway – the approach to the San Francisco–Oakland Bay Bridge – through downtown San Francisco to Broadway St.
- **Interstate before conversion?** No
- **Length:** 2 miles
- **Lanes:** Four
- **Traffic:** 100,000 daily vehicles
- **Status:** Earthquake damaged freeway in 1989 and was completely removed in 1992; replaced with the surface-level boulevard





Embarcadero Freeway – San Francisco, CA

- **Connections at each end:** Connected Broadway along the Embarcadero to the Bay Bridge
- **Interstate before conversion?** No
- **Length:** -
- **Lanes:** Four (two in each direction)
- **Traffic:** 100,000 daily vehicles
- **Status:** Earthquake damaged the freeway in 1989; closed & eventually removed in 1991
- **Converted to multi-use boulevard**
 - Contains two banks of thoroughfare traffic, 3 lanes going in each direction and a streetcar line down the center



Park East Freeway - Milwaukee, WI

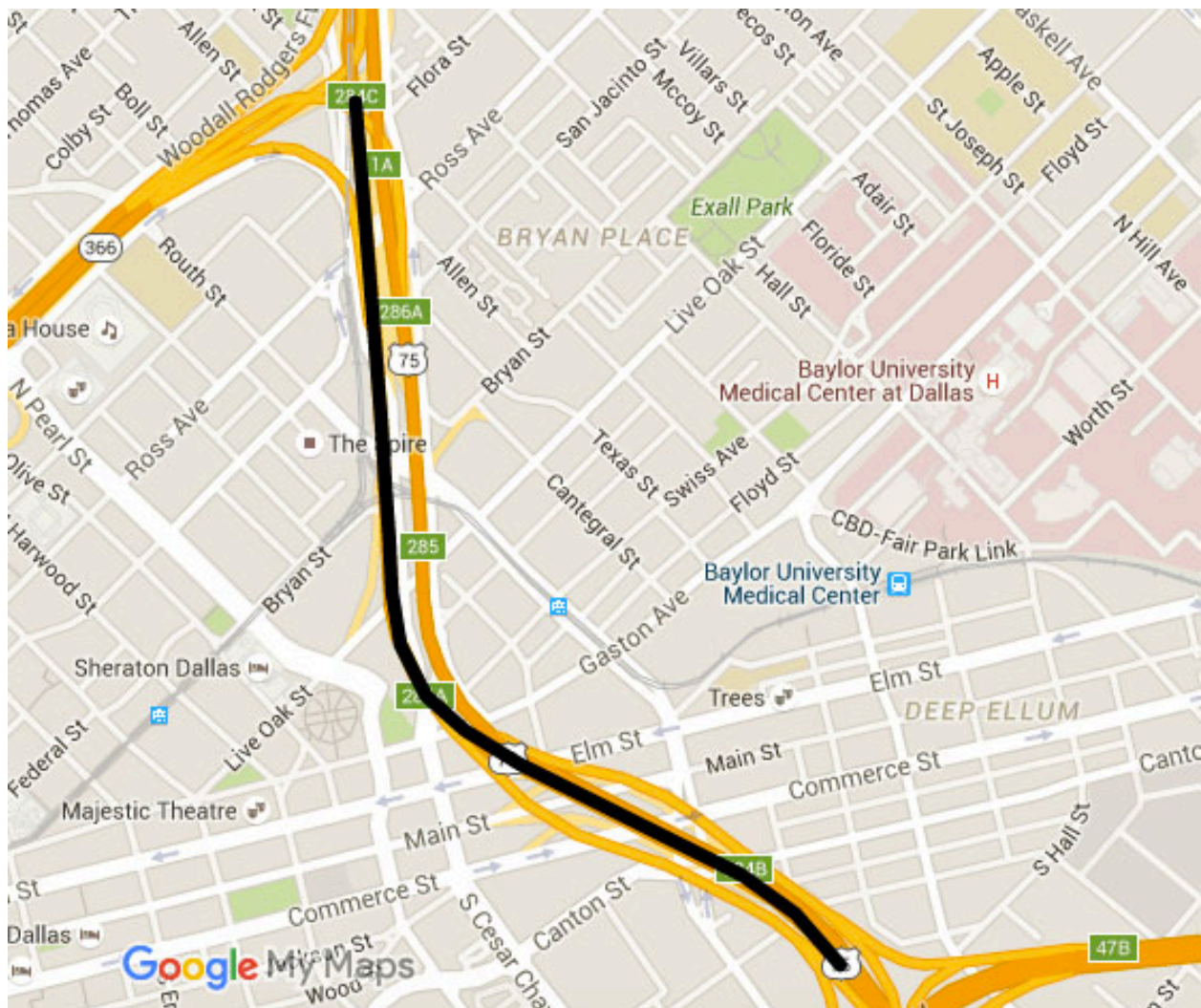
- **Connections at each end:** Connected Lake Freeway at the northeast corner of downtown and proceeded westerly across the north side of downtown to a junction with the North-South Freeway
- **Interstate before conversion?** No
- **Length:** 1 mile
- **Lanes:** -
- **Traffic:** 54,000 daily vehicles
- **Status:** Demolished in 2002 and replaced with six-lane boulevard



Highways/Interstates Under Debate for Removal:

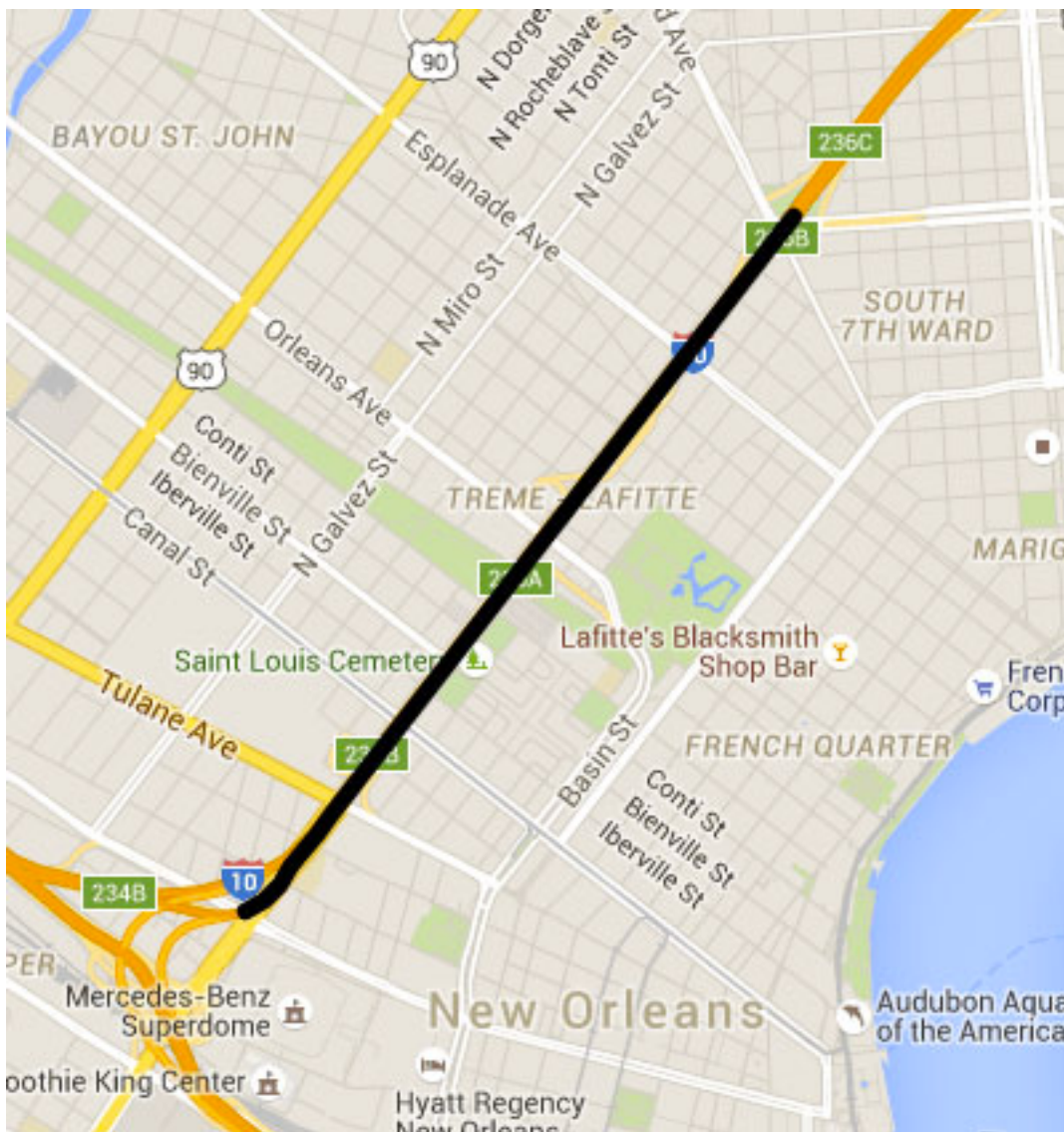
I-345 - Dallas, TX

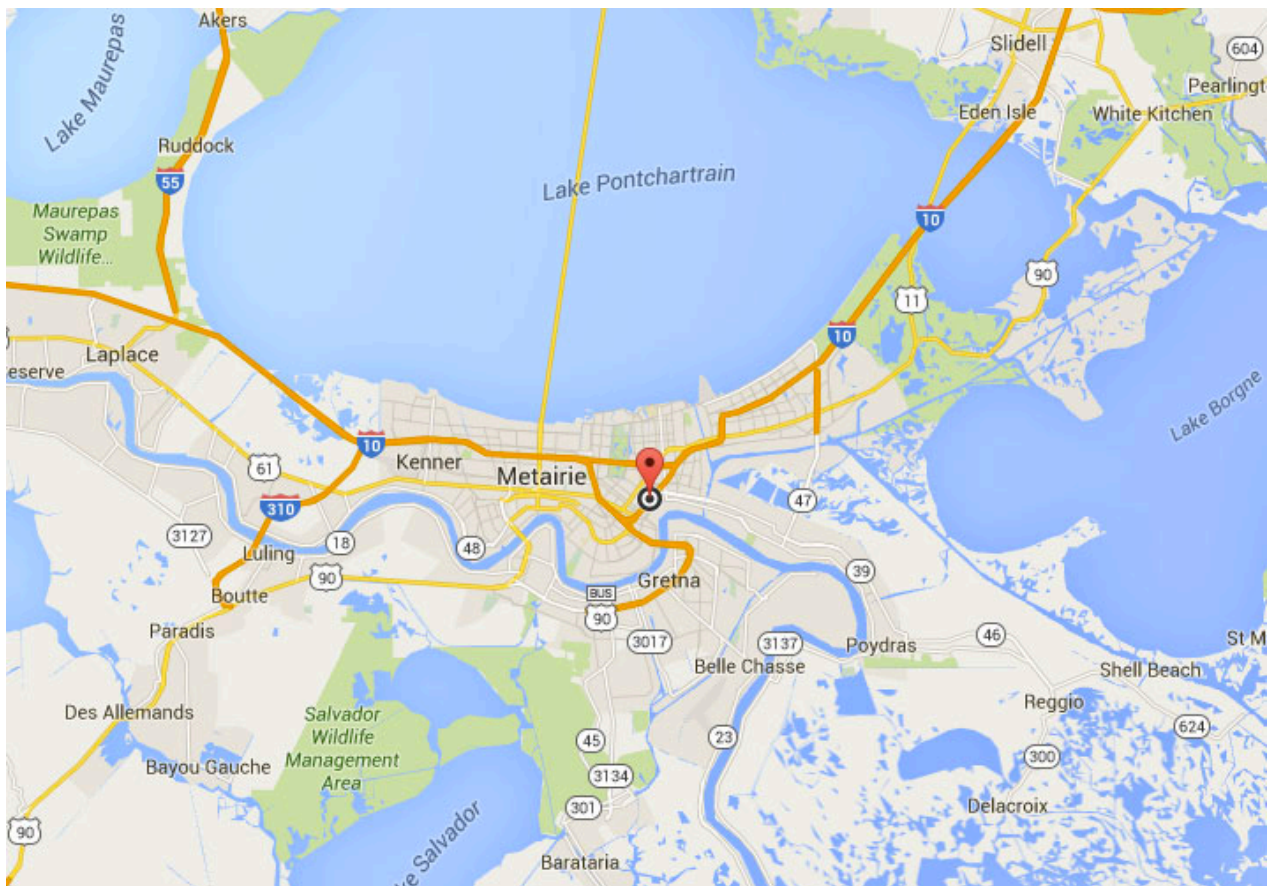
- **Connections at each end:** North: I-70 South: I-35
- **Interstate:** Yes
- **Length:** 1.4 miles
- **Lanes:** Three
- **Traffic:** 170,00 daily vehicles
- **Status:** Project proposal pending to demolish the elevated structure of the interstate
 - Proponents want it replaced with an at-grade parkway and reconnected streets
 - Bridge was designed and built in 1974



I-10/Claiborne Overpass - New Orleans, LA

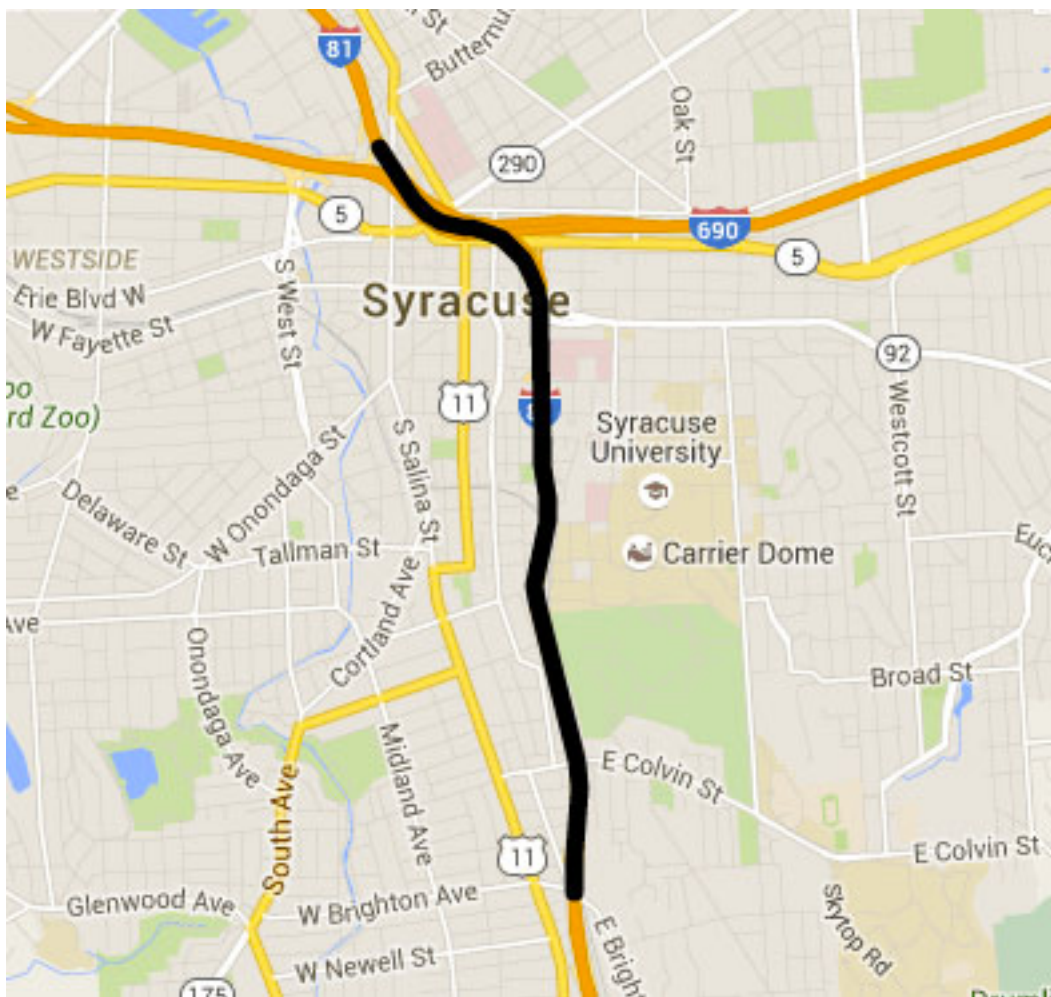
- **Connections at each end:** Elevated portion of I-10 (the interstate connects Pacific Ocean at State Route 1 in Santa Monica, CA, to I-95 in Jacksonville, FL) built directly over Claiborne Avenue
- **Interstate:** Yes
- **Length:** 2.2 miles
- **Lanes:** Six
- **Traffic:** 70,000-110,000 daily vehicles
- **Status:** Active
 - Increasing calls from local neighborhoods to remove overpass after damaged sustained from Hurricane Katrina
 - Proponents of removal say it would reconnect neighborhoods, reclaim city blocks and replenish oak trees

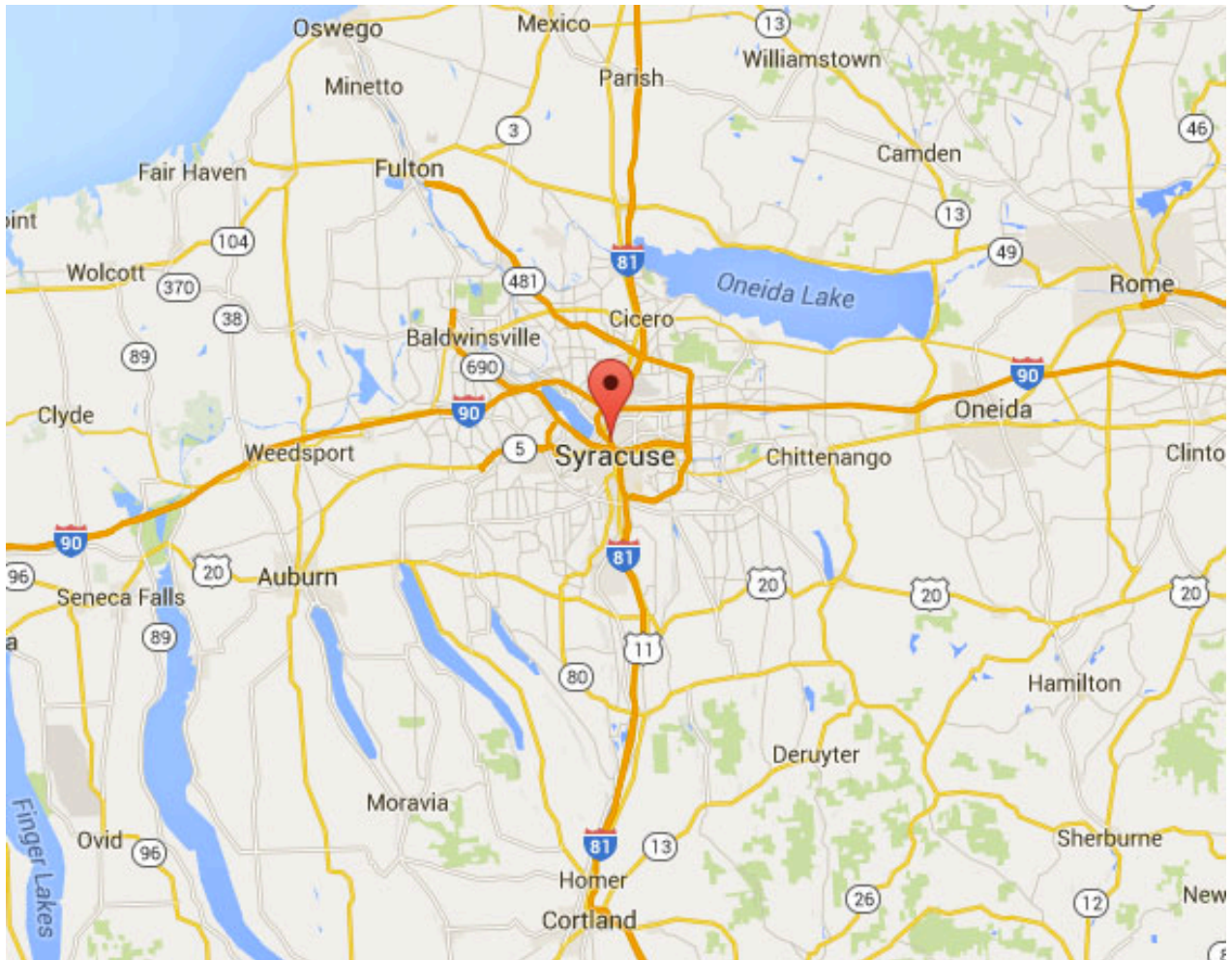




I-81 – Syracuse, NY

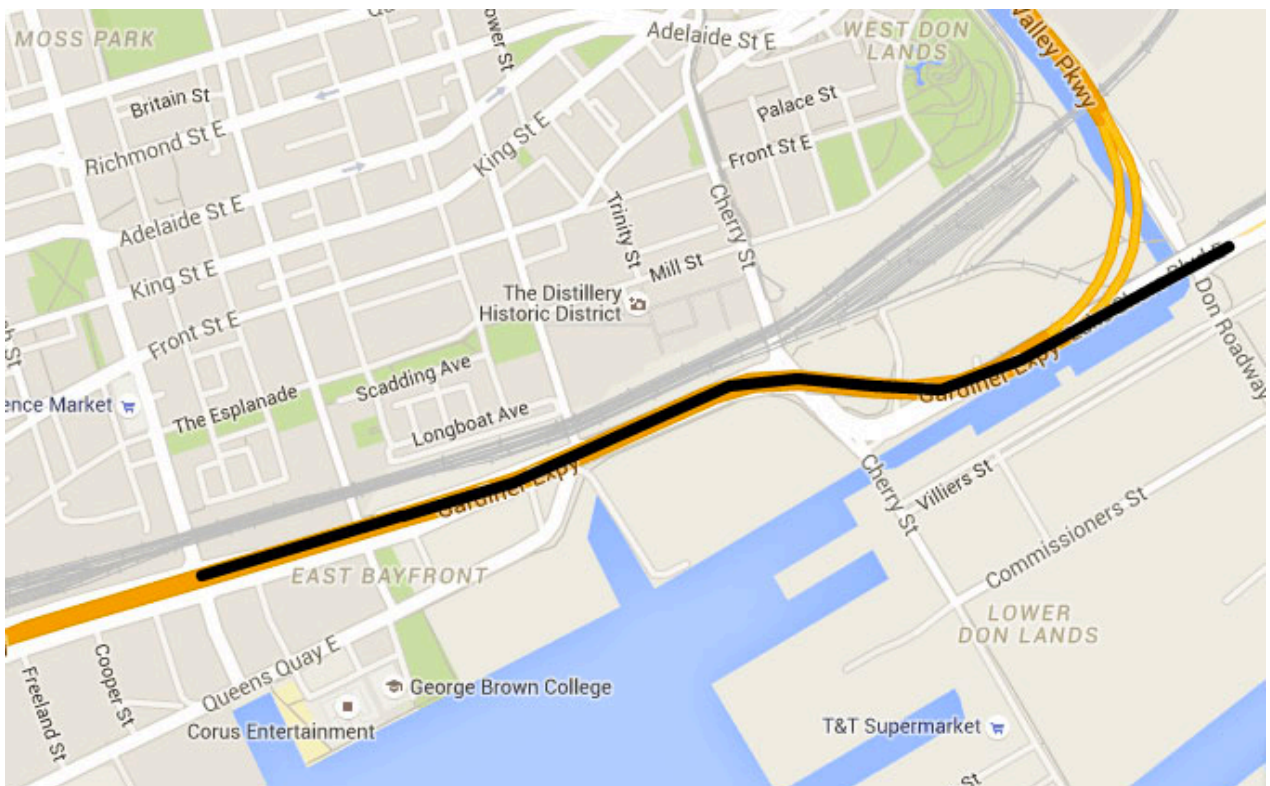
- **Connections at each end:** Interstate segment runs east of downtown and connects with I-690
- **Interstate:** Yes
- **Length:** 1.4 miles
- **Lanes:** Three
- **Traffic:** 43,000-90,000 daily vehicles
- **Status:** Active
 - Local political and university leaders are pushing to remove the elevated interstate
 - Removal advocates want an urban boulevard that would reconnect downtown neighborhoods
 - Supporters say it will be less costly to maintain and increase economic activity along the corridor

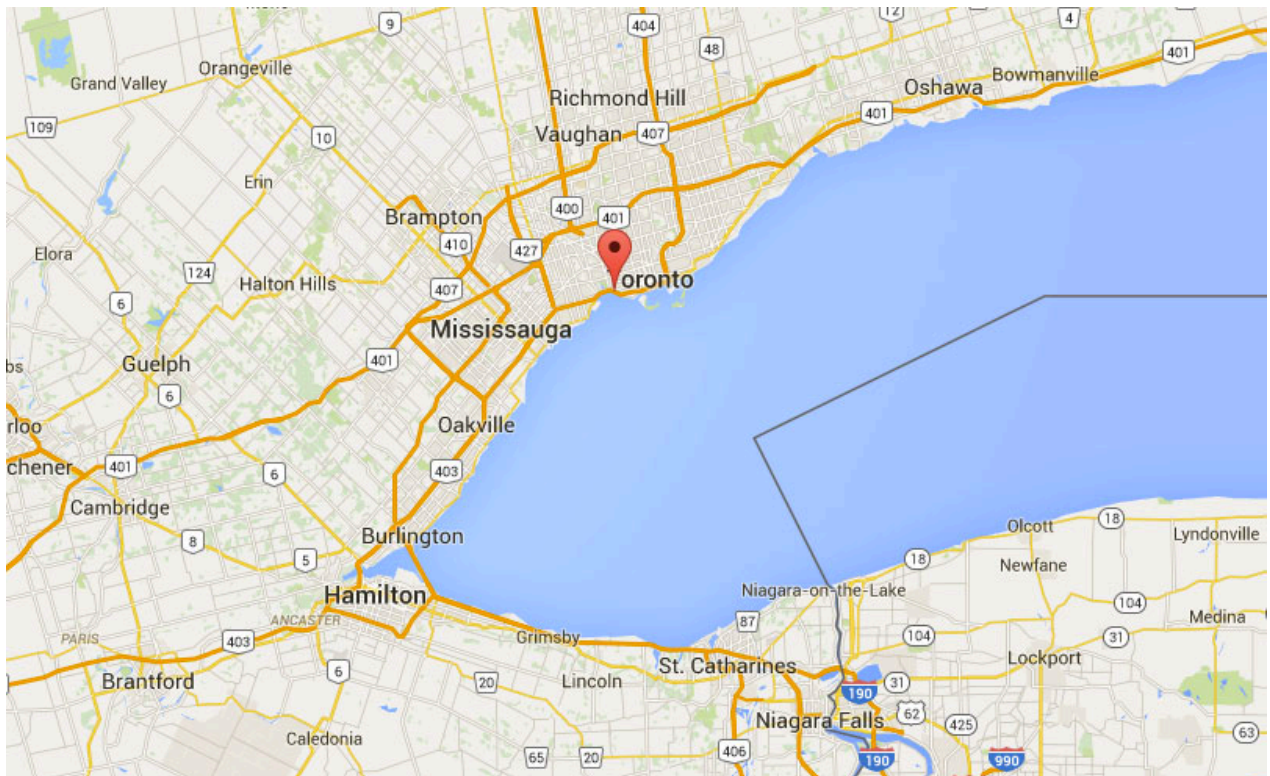




Gardiner Expressway – Toronto, ON

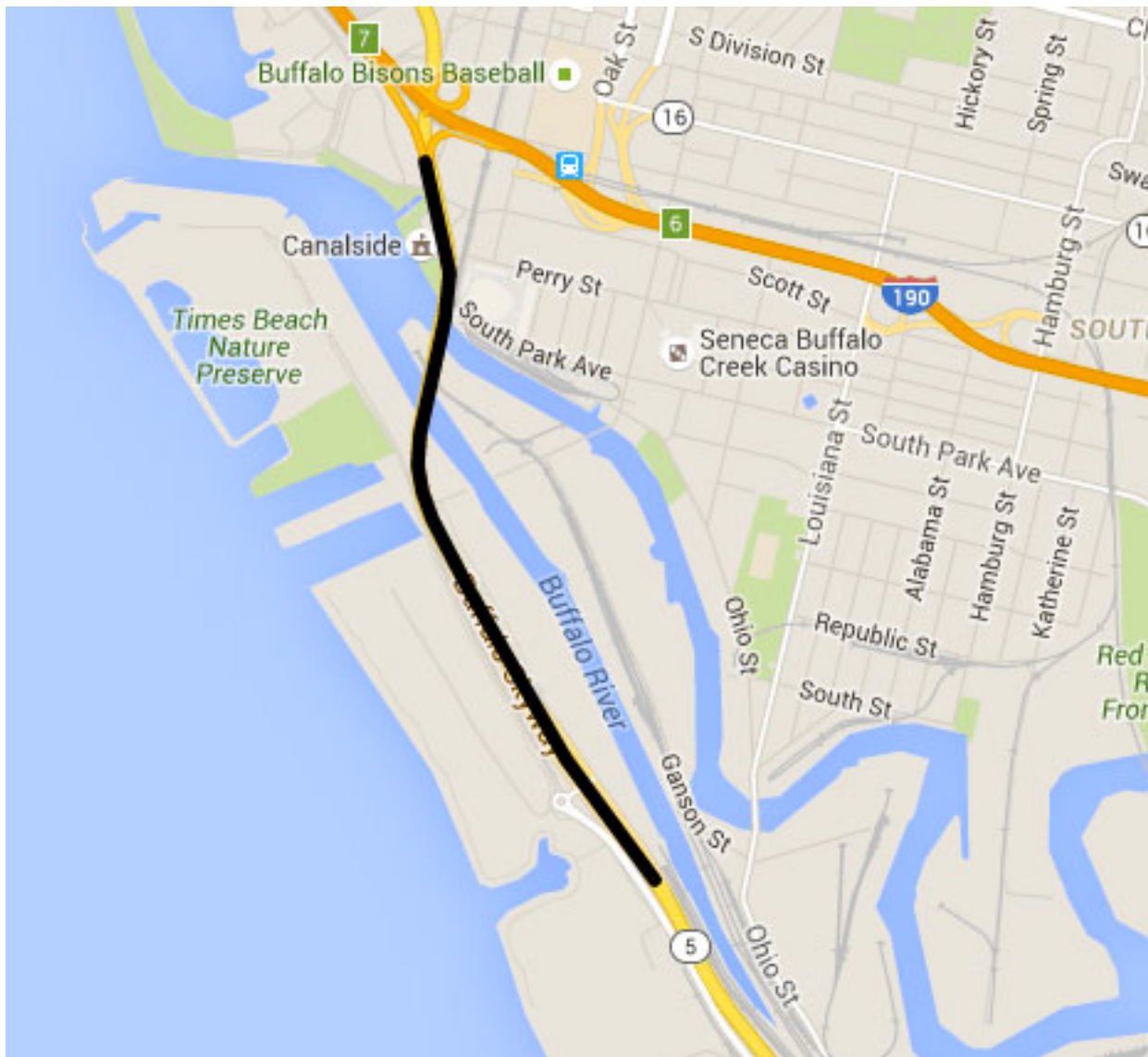
- **Connections at each end:** Major east-west thoroughfare that connects downtown Toronto to its western suburbs
- **Interstate:** No
- **Length:** 1.5 miles
- **Lanes:** Eight
- **Traffic:** 120,000 vehicles daily
- **Status:** Active
 - Local citizens have called for the removal of a 1.5 mile stretch of the elevated expressway as it runs from from Jarvis Street to just east of the Dan Valley Parkway
 - Removal supported by local officials
 - A far eastern portion of the freeway was successfully removed in 1999

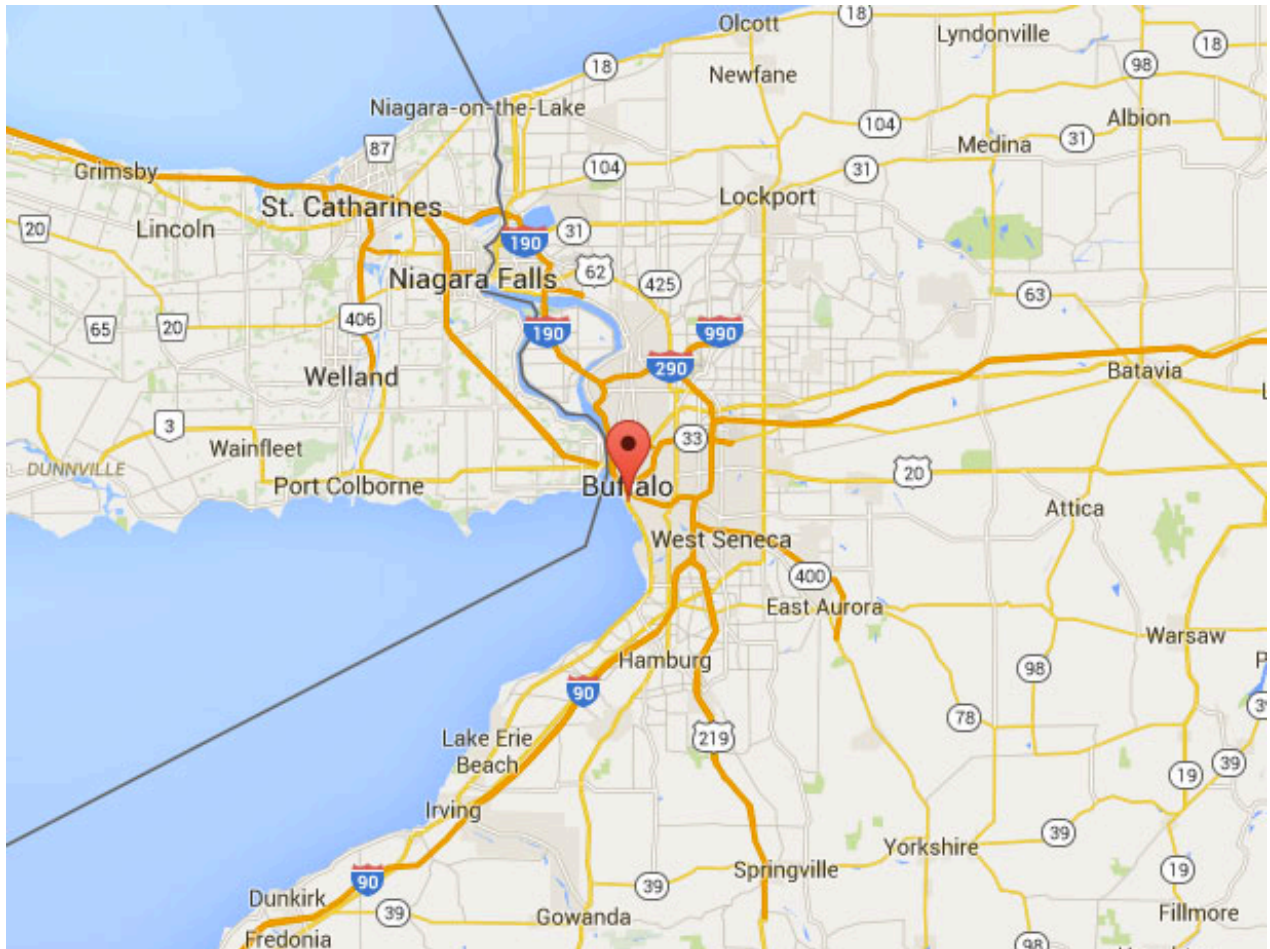




Route 5/Skyway - Buffalo, NY

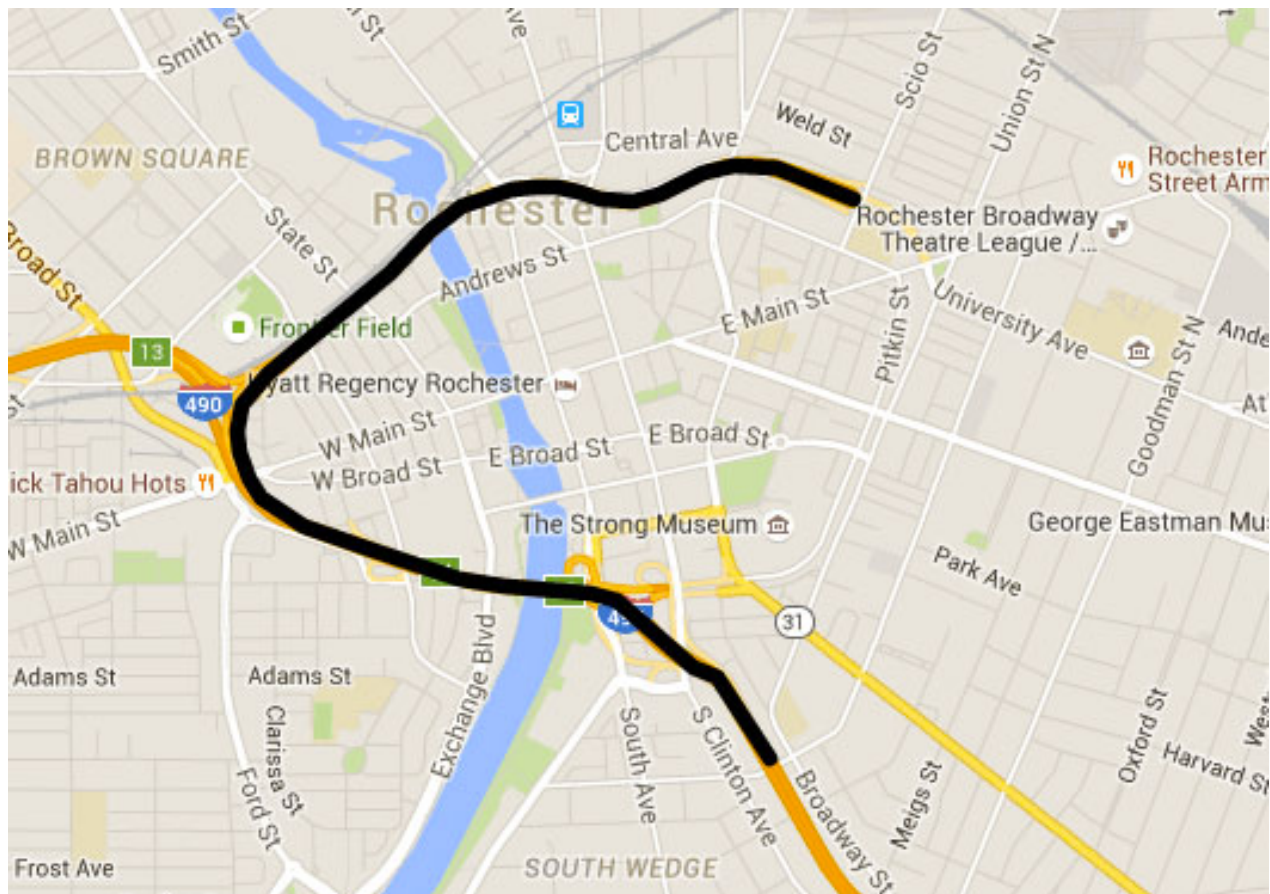
- **Connections at each end:** Begins at the Inner Harbor downtown, crosses the Buffalo River and touches down as Route 5 in the Outer Harbor
- **Interstate:** No
- **Length:** 1.4 miles
- **Lanes:** Four
- **Traffic:** 41,500 daily vehicles
- **Status:** Active bridge
- Local citizens and civic organizations call for removal and replacement of bridge with surface boulevard
 - Removal advocates tout environmental and economic benefits for downtown and waterfront redevelopment

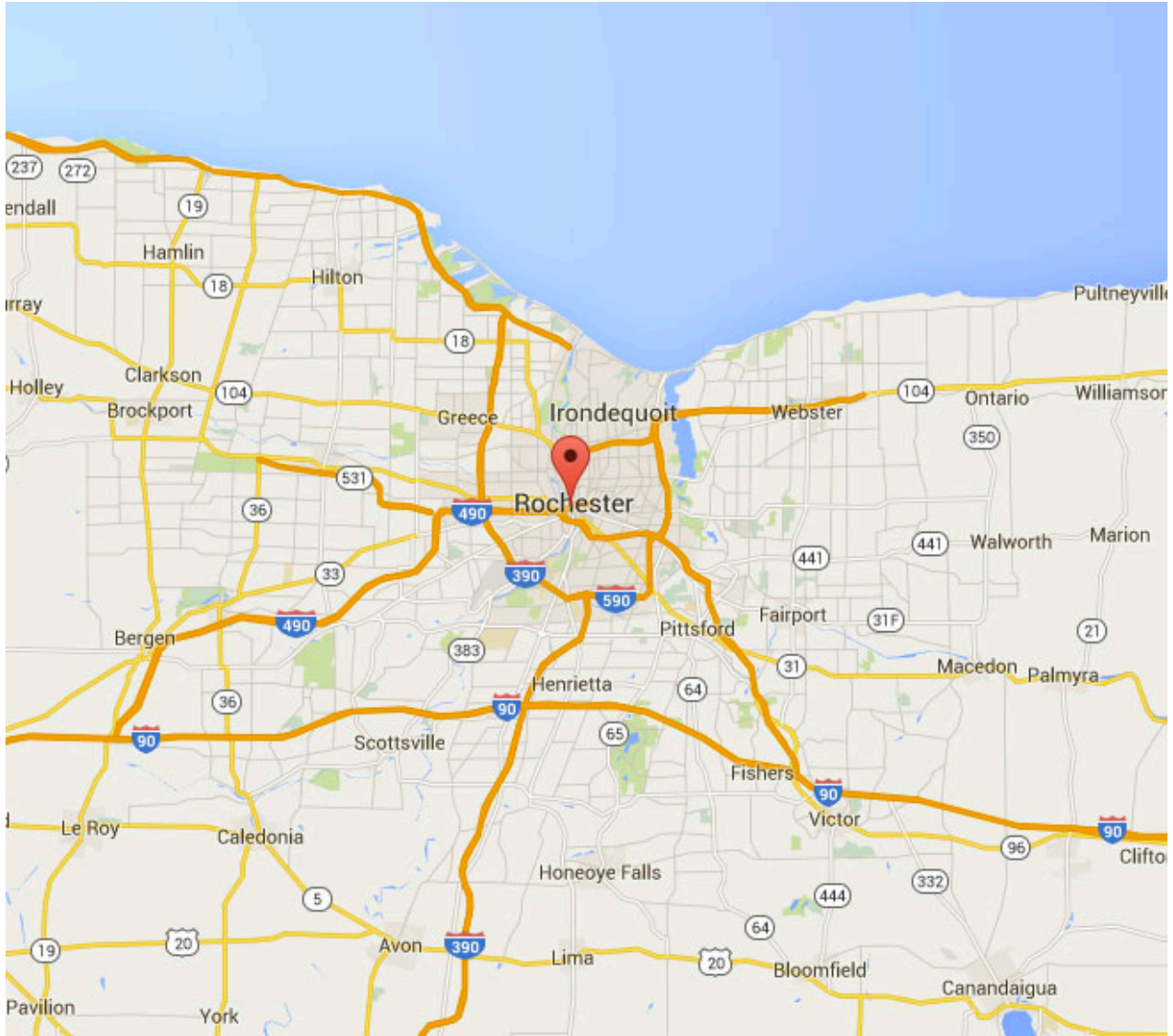




Inner Loop – Rochester, NY

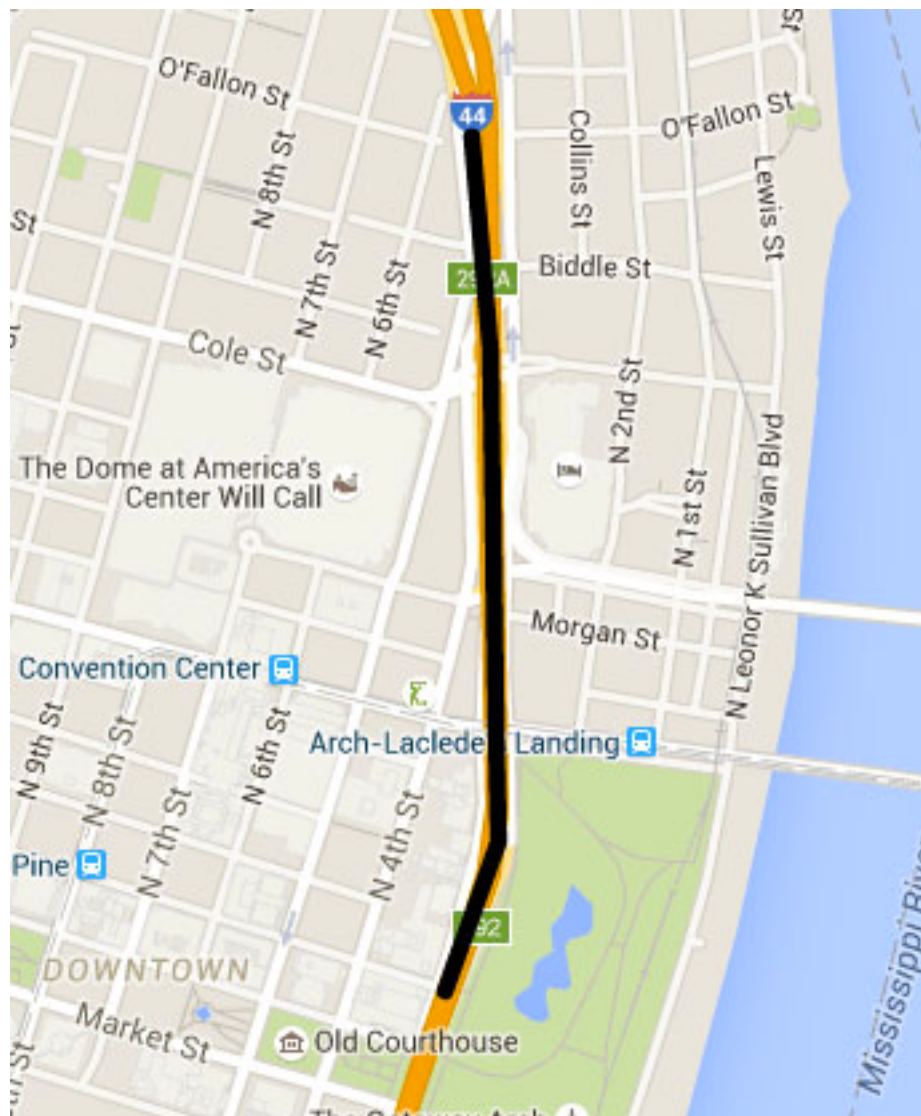
- **Connections at each end:** West: I-490 exit 13; East: I-490 exits 15 and 16 directly south of downtown
- **Interstate:** No
- **Length:** 2.68 miles
- **Lanes:** 12
- **Traffic:** 10,500-46,500 daily vehicles
- **Status:** Under construction
- Plan in motion to reconstruct a 2/3 mile stretch of the eastern segment between Monroe Avenue and Charlotte Street with at-grade boulevard
- Sections were shutdown in 2015 and are currently under construction
- Removal advocates say it will beautify the city and could improve economically distressed areas

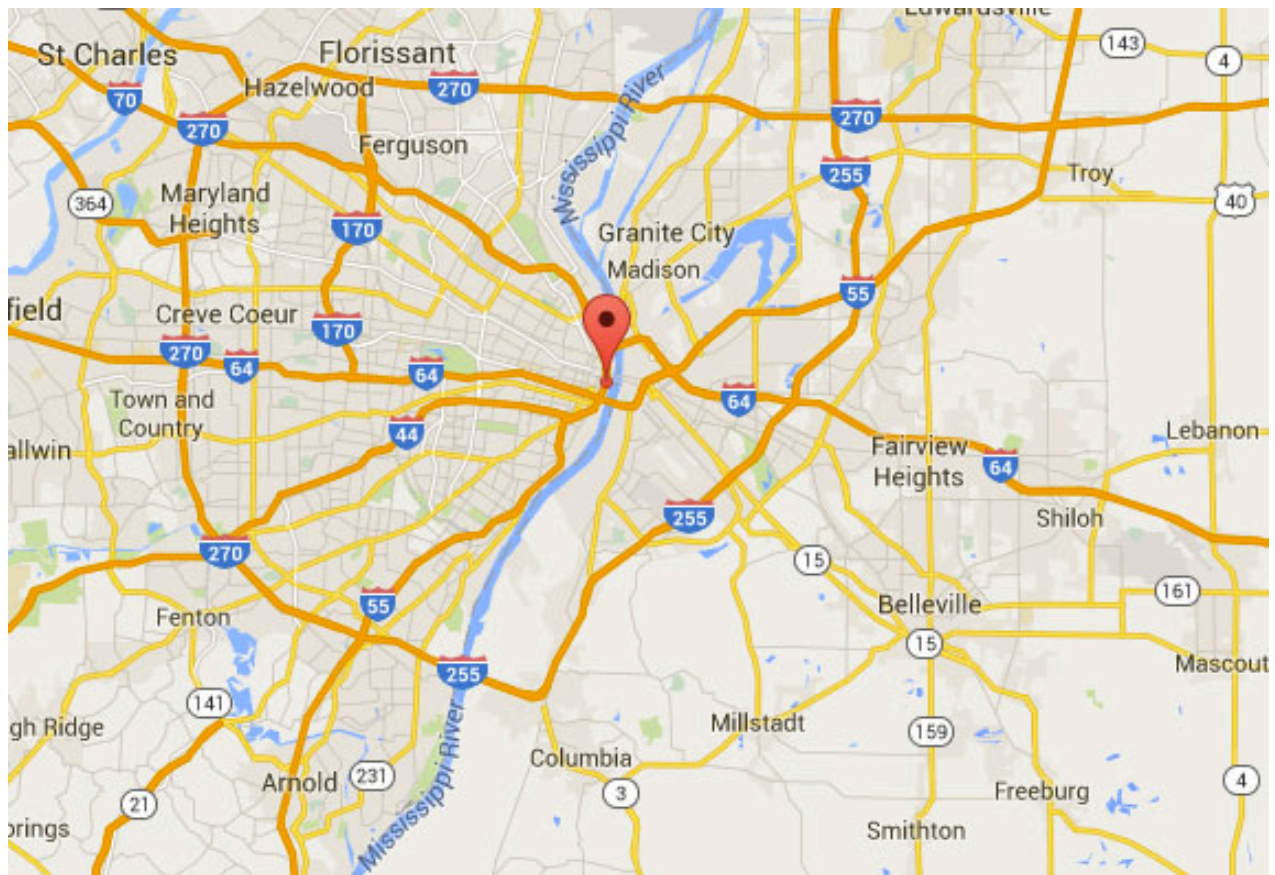




I-70 – St. Louis, MO

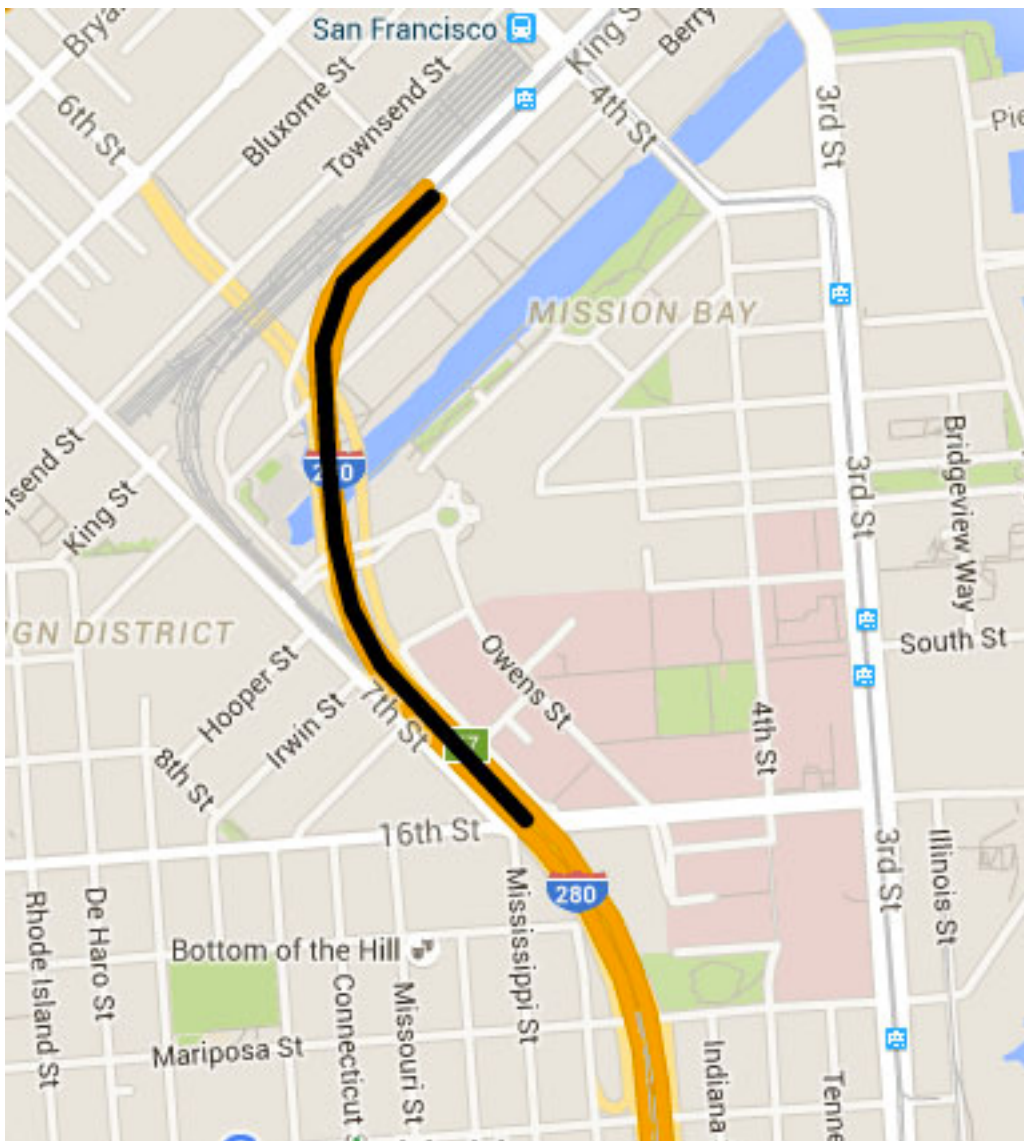
- **Connections at each end:** Passes through St. Louis from East of Wentzville to the city of St. Charles
- **Interstate:** Yes
- **Length:** 1.4 miles
- **Lanes:** 13
- **Traffic:** 165,000 daily vehicles
- **Status:** Active
- Changed routes to north of downtown; former route is now I-44
- Advocates called for the replacement with urban boulevard, renovation plans never materialized
- Instead, an enhanced pedestrian access and landscaping overtop was implemented on depressed portion of I-70, named "Park Over the Highway"

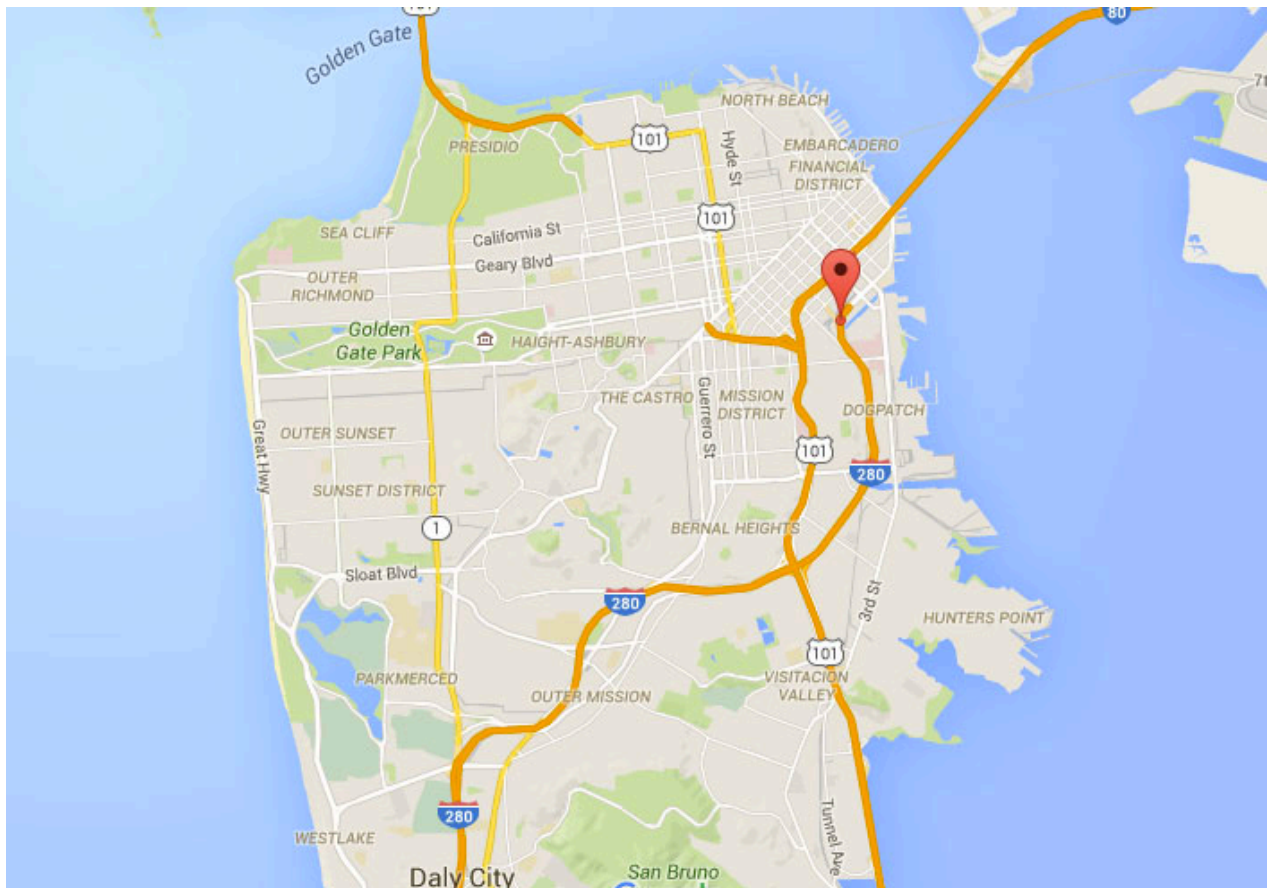




I-280 – San Francisco, CA

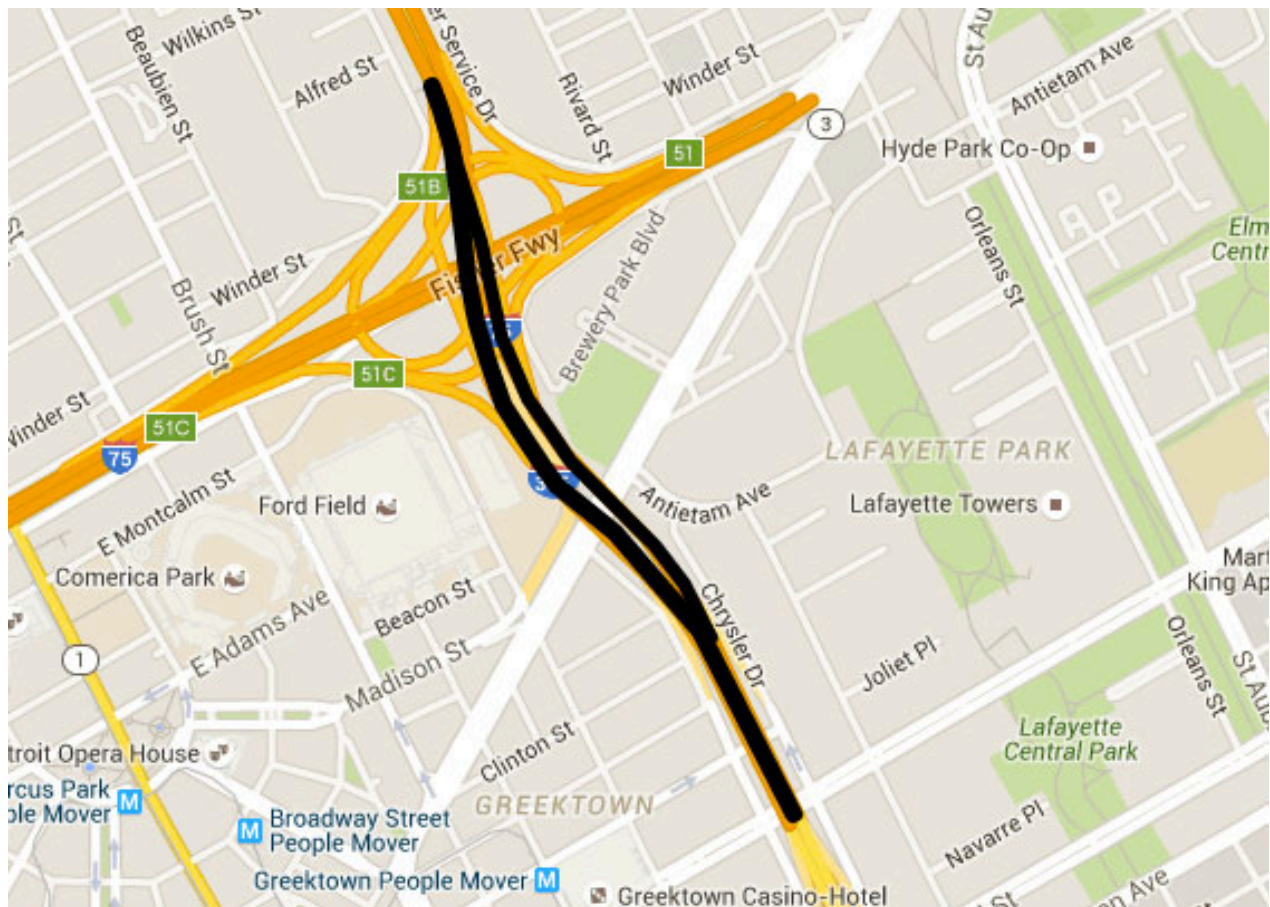
- **Connections at each end:** Connects 4th and King Streets south to 16th Street
- **Interstate:** Yes
- **Length:** 1.2 miles
- **Lanes:** Eight
- **Traffic:** 11,000 to 226,000 daily vehicles
- **Status:** Active
 - Mayor is pushing proposal to remove stretch of I-280 and replace with boulevard
 - Proposal calls for an eventual connection with rail line service

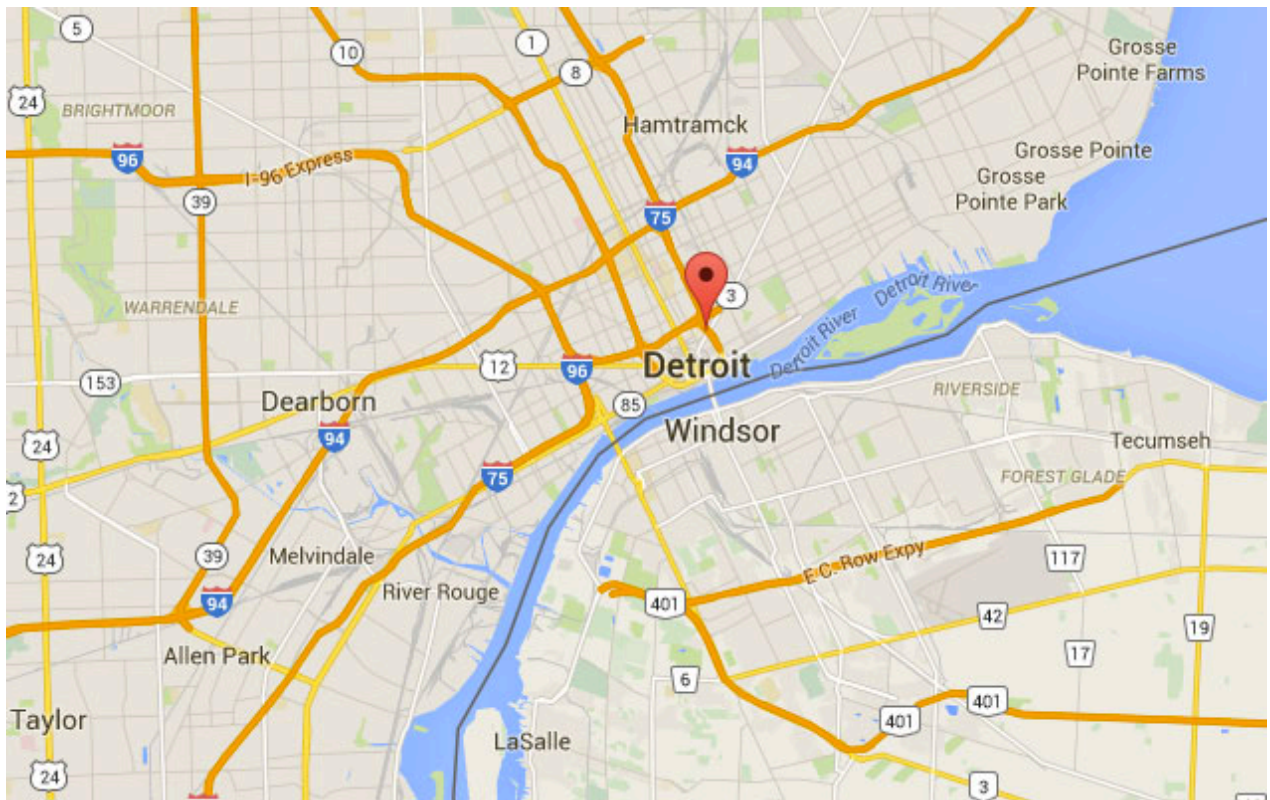




I-375 – Detroit, MI

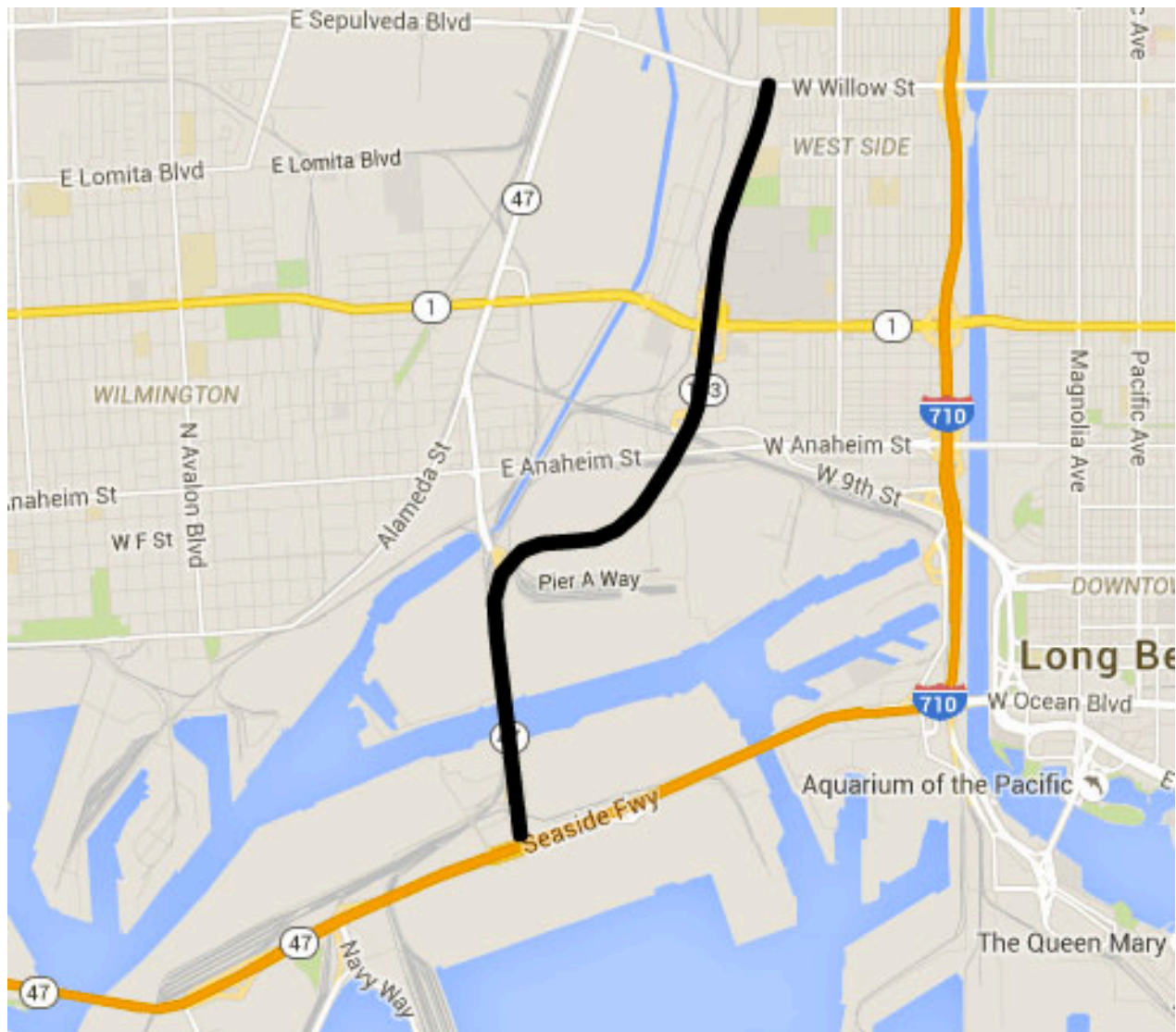
- **Connections at each end:** Connects southernmost leg of the Walter P. Chrysler Freeway and a spur of I-75 into downtown Detroit, ending at BS Interstate 375
- **Interstate:** Yes
- **Length:** 1.06 miles
- **Lanes:** Four
- **Traffic:** 17,101 to 41,512 daily vehicles
- **Status:** Active
 - MDOT has indefinitely delayed any course of action on the highway removal
 - Six alternative proposals for rebuilding I-375 were unveiled by MDOT in June 2014
 - Proposals included rebuilding, replacing with boulevard, upgrading existing freeway to include bike lanes and other pedestrian-friendly features

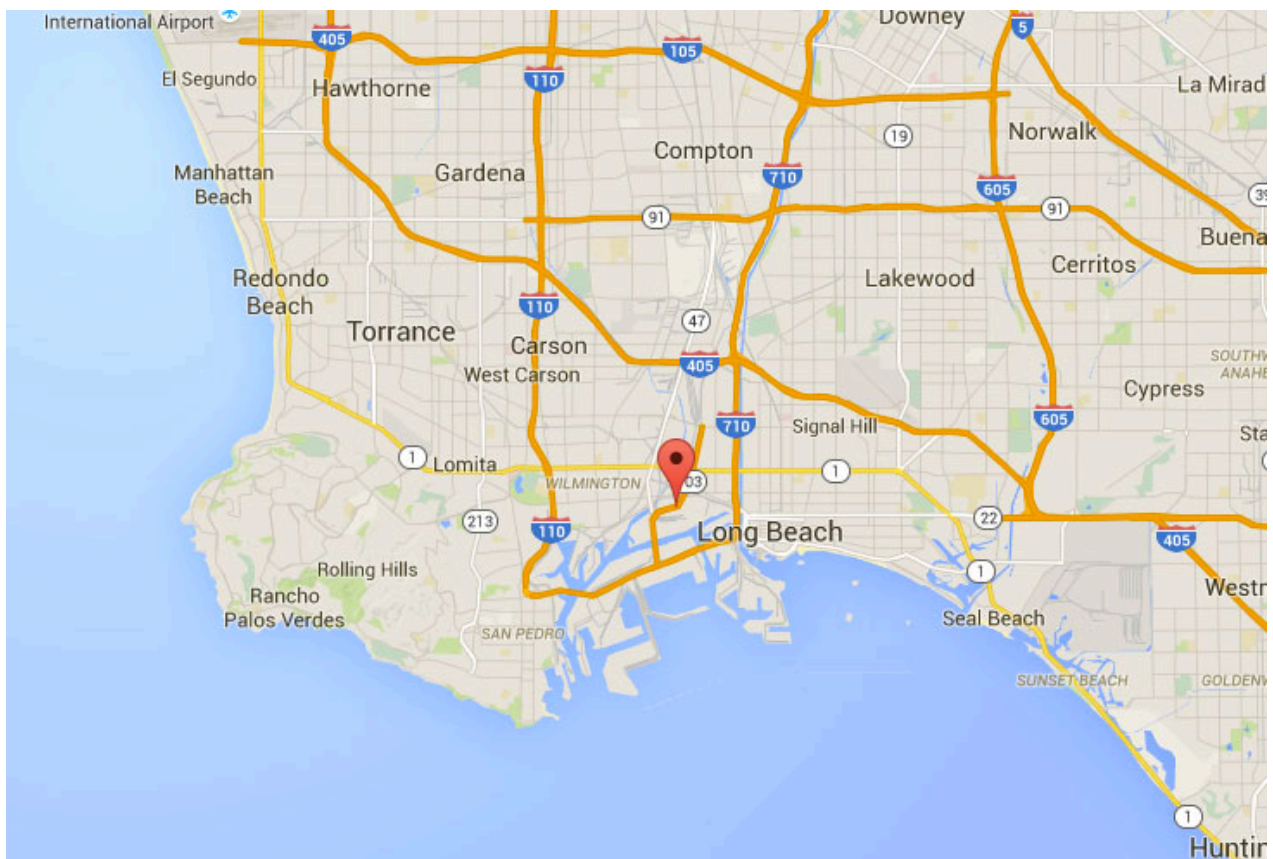




Terminal Island Freeway – Long Beach, CA

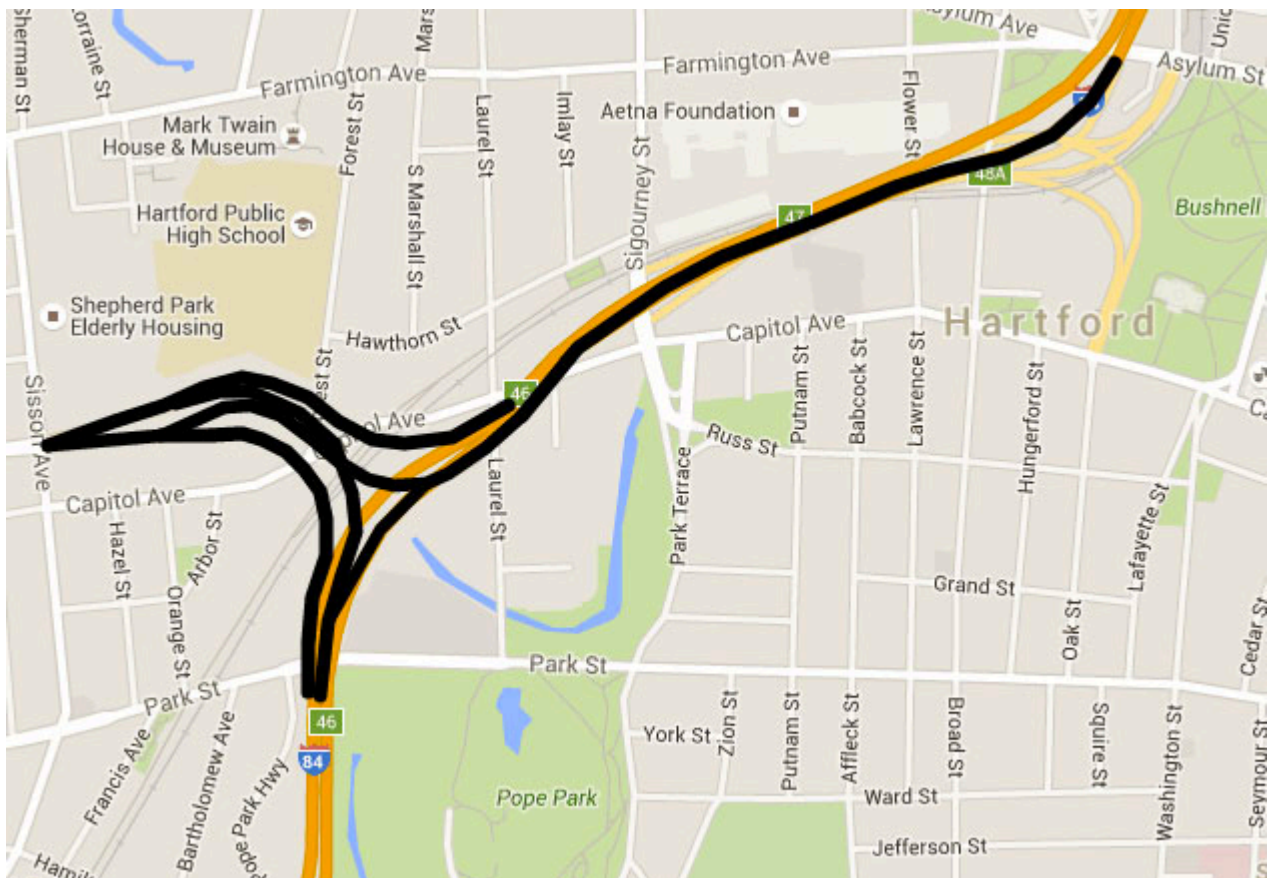
- **Connections at each end:** Connects Seaside Freeway to Willow Street
- **Interstate:** No
- **Length:** 1.6 miles
- **Lanes:** Four
- **Traffic:** 11,000 vehicles per day
- **Status:** Active
 - The Long Beach City Council voted unanimously in 2015 to conduct an environmental study for the removal of the freeway
 - Would be replaced with parks

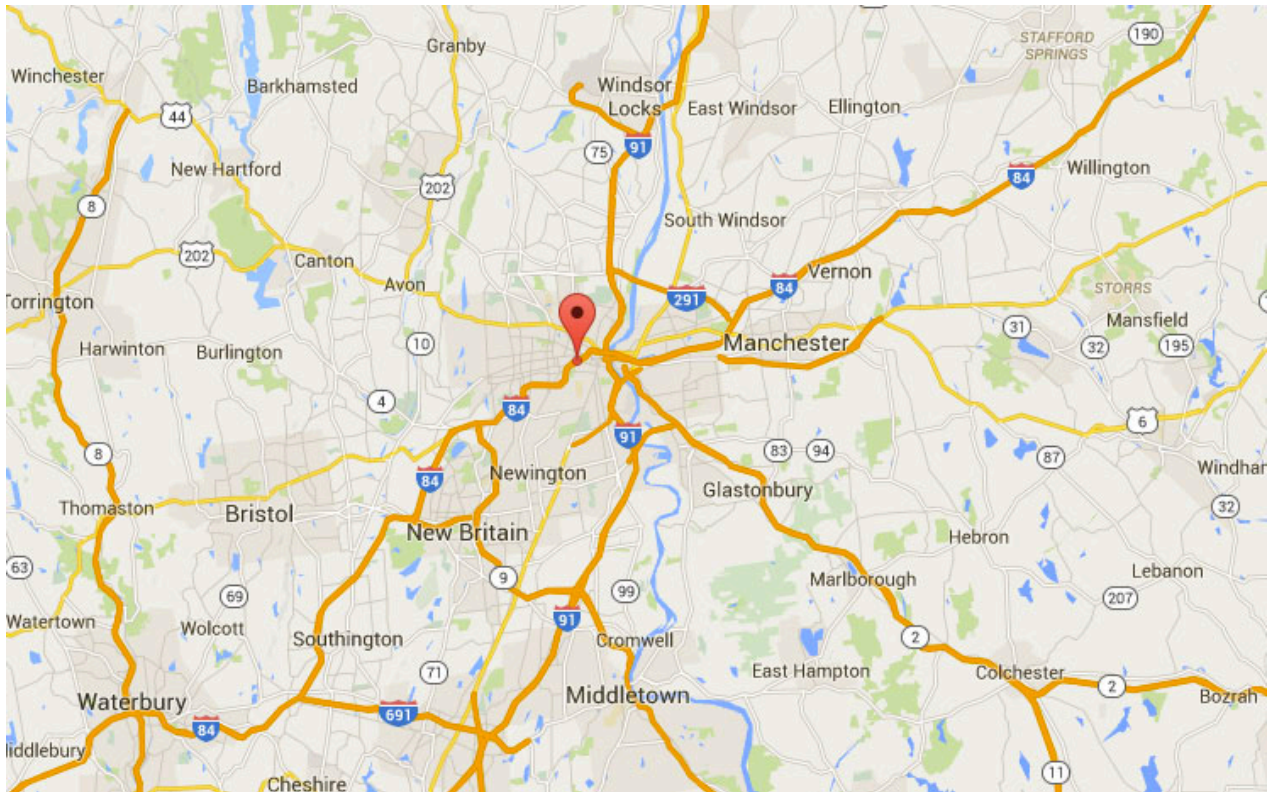


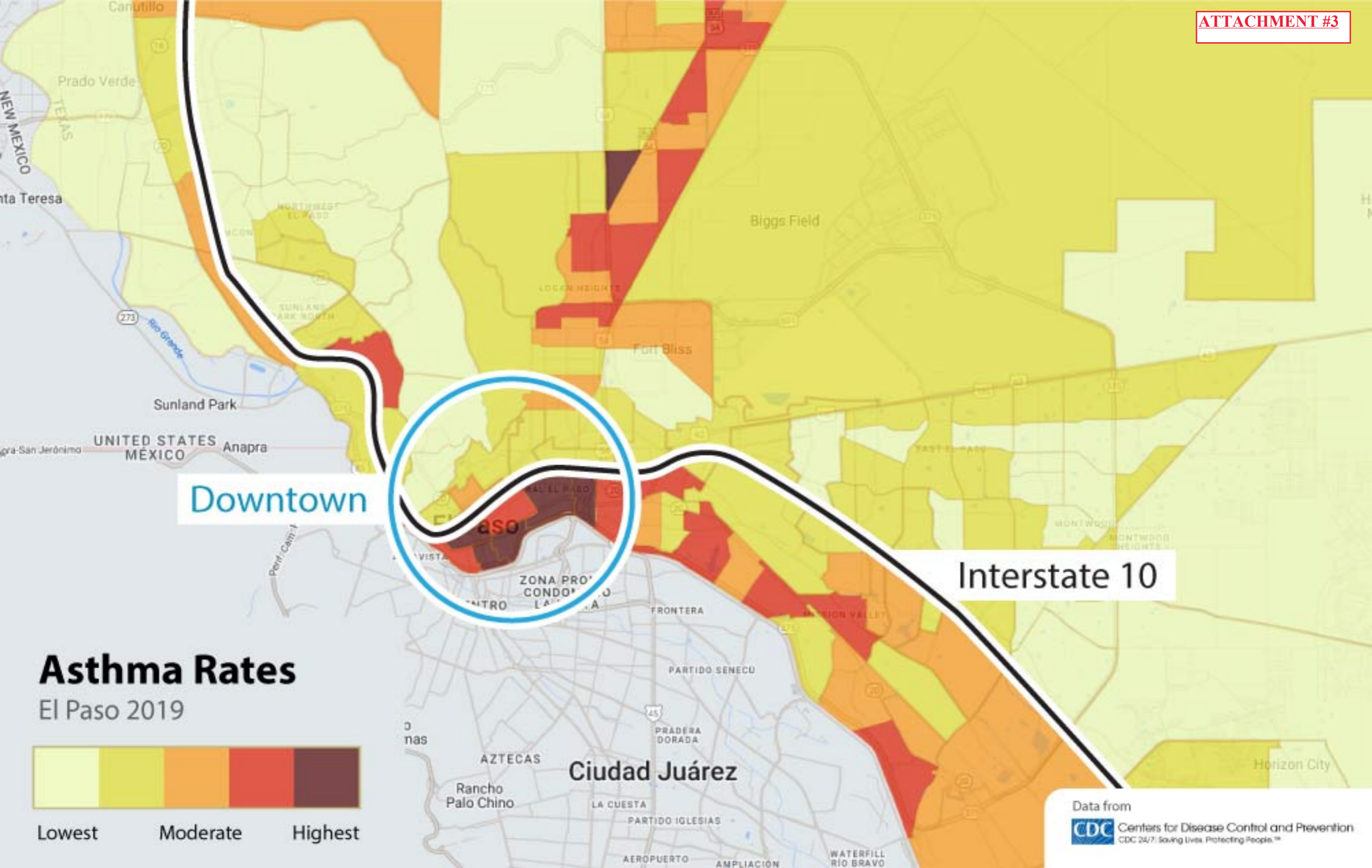


Aetna Viaduct – Hartford, CT

- **Connections at each end:** Elevated I-84 viaduct that begins at Sisson Avenue and runs through the heart of downtown Hartford
- **Interstate:** No
- **Length:** ¾ mile
- **Lanes:** Two
- **Traffic:** 175,000 daily vehicles
- **Status:** Active
 - A 2010 study reinforced idea of replacing the deteriorating viaduct; prospects for replacing the it have since faded
 - DOT expected to finalize plan in 2016





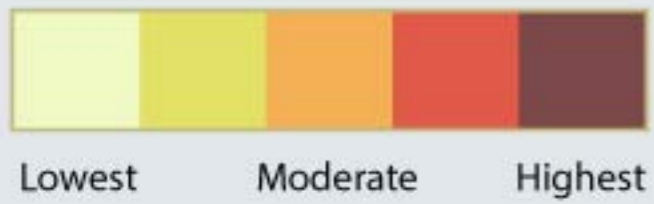


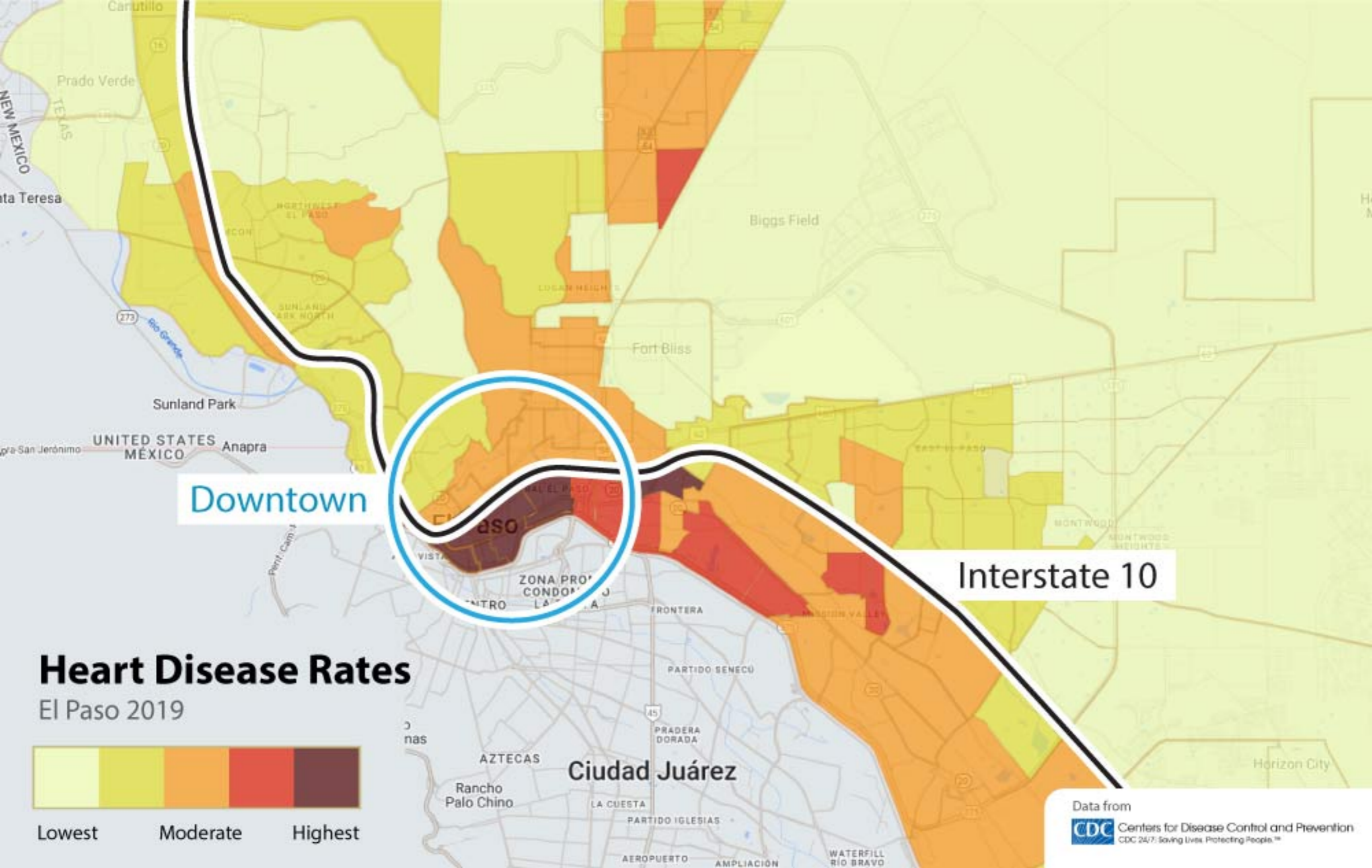
Downtown

Interstate 10

Asthma Rates

El Paso 2019



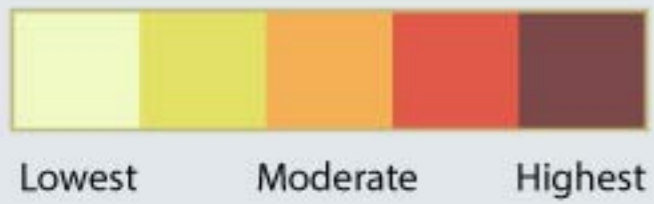


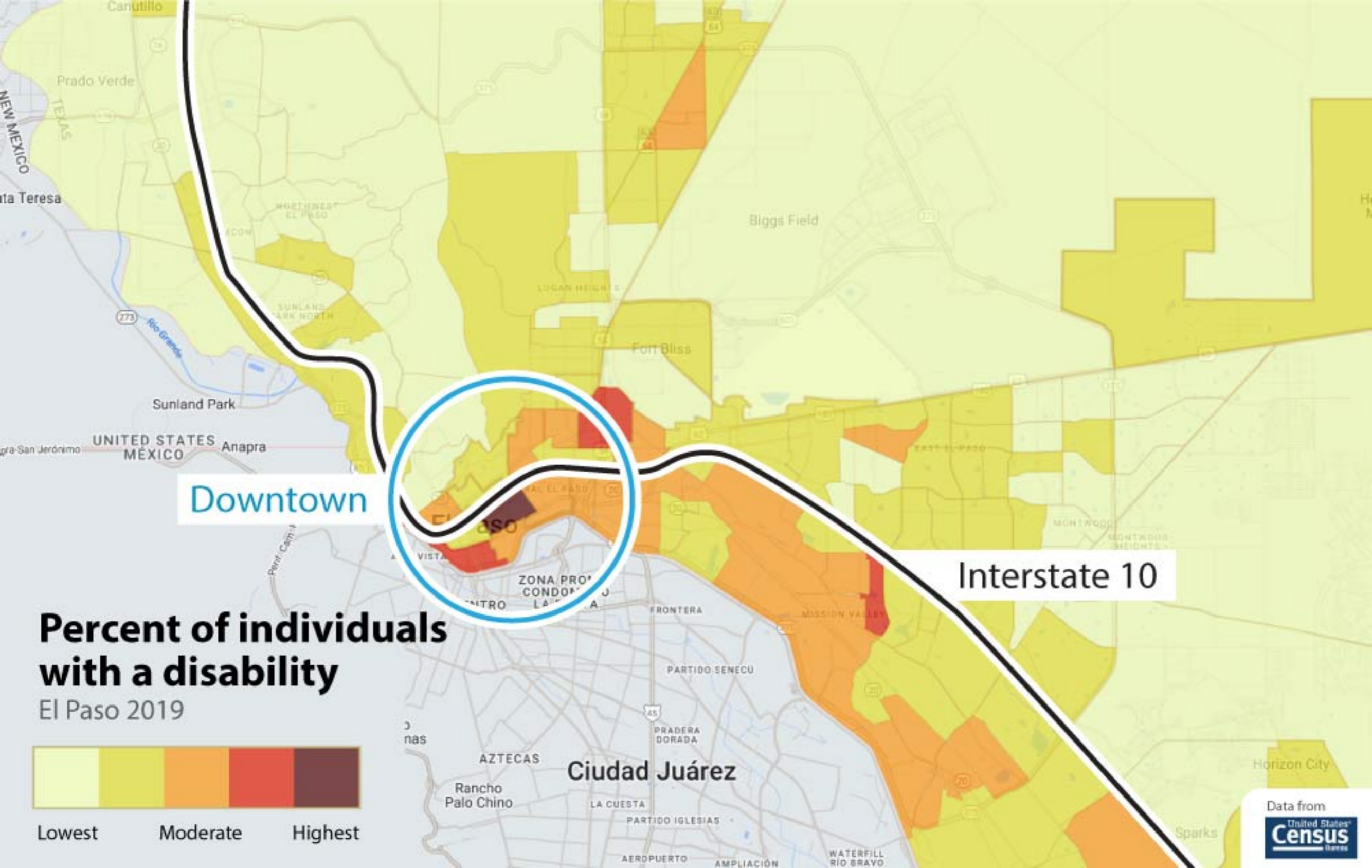
Downtown

Interstate 10

Heart Disease Rates

El Paso 2019



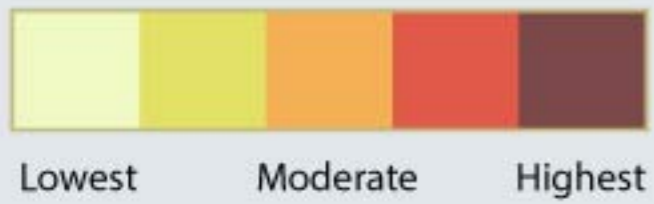


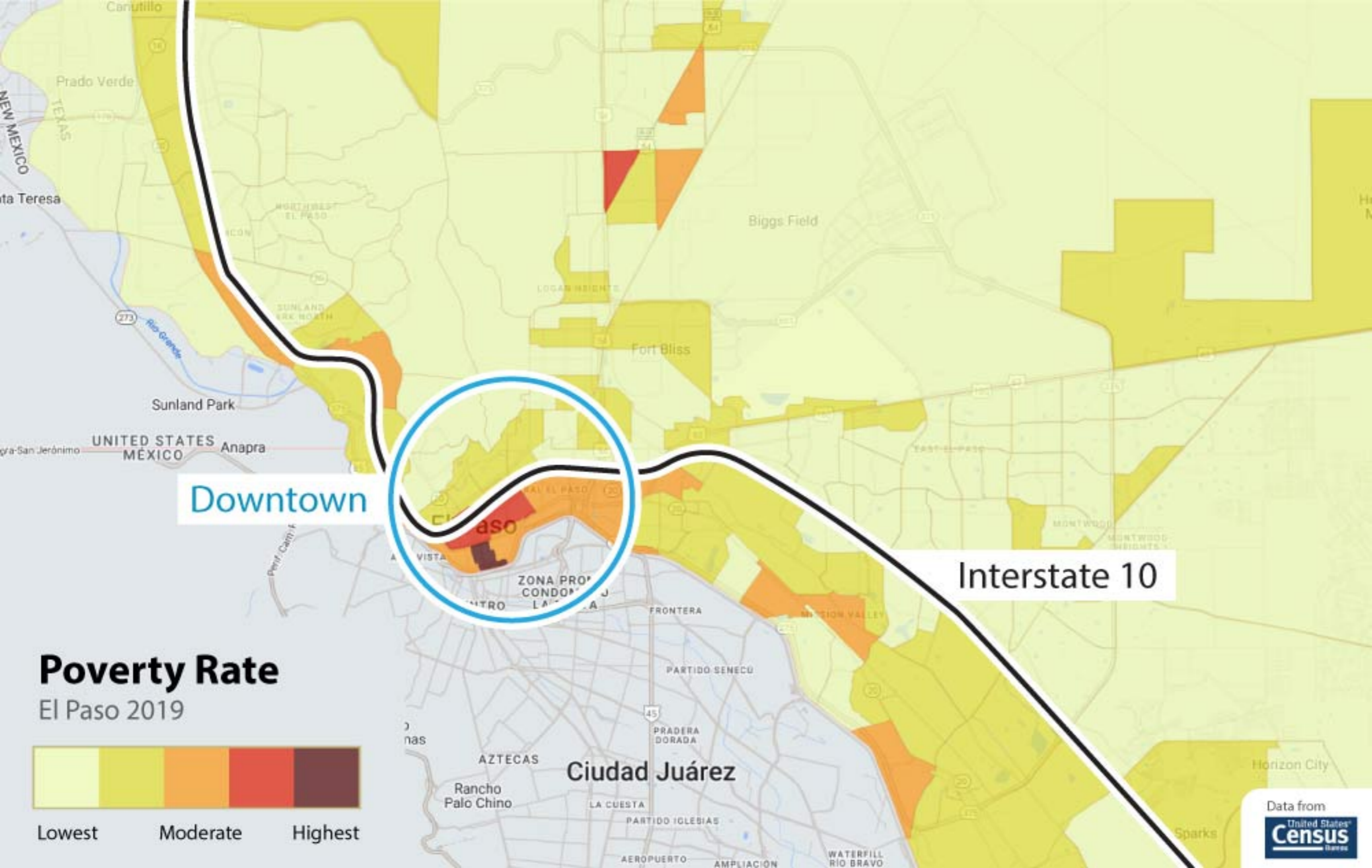
Downtown

Interstate 10

Percent of individuals with a disability

El Paso 2019





Downtown

Interstate 10

Poverty Rate

El Paso 2019



Lowest Moderate Highest

Sent Via Email to epmpo@elpasompo.org on March 9, 2022

Dear El Paso Metropolitan Planning Organization:

On behalf of Familias Unidas del Chamizal, the Rio Grande Chapter of the Sierra Club, and Sunrise El Paso (“Commenters”), thank you for the opportunity to comment on the Regional Mobility Strategy (RMS) 2050 Metropolitan Transportation Plan (MTP), RMS 2023-2026 Transportation Improvement Program (TIP), and Transportation Conformity Report (TCR, collectively the “Planning Documents”). Our organizations represent hundreds of individuals living in El Paso and Doña Ana County, New Mexico. We are committed to protecting residents of this region from air pollution, with a special focus on eliminating disproportionate pollution impacts on low-income and minority communities.

We respectfully urge the MPO to reject the failed policy of endless highway expansion and instead redirect resources towards projects that will reduce air pollution, mitigate the climate crisis, improve the safety and reliability of existing infrastructure, and increase quality of life in our region. Among other things, the MPO should focus on expanding public transit options, increasing walkability, building more bike lanes, maintaining and repairing existing infrastructure, and investing in electric vehicle charging infrastructure.

A. Our Transportation Policy Must Be Aimed at Mitigating Air Pollution and the Climate Crisis

Our community continues to experience unsafe levels of air pollution. In 2020, the American Lung Association, ranked El Paso-Las Cruces at number 13 on a list of the most ozone-polluted metropolitan areas in the United States, worse than New York, Chicago, and Dallas-Fort Worth.¹ These elevated pollution levels cause real harm to individuals in our community. According to analysis by researchers at New York University and the American Thoracic Society, elevated ozone levels in El Paso-Las Cruces cause, on an annual basis, about 22 premature deaths, 110 emergency room visits, and over 224,000 missed work or school days.²

In addition, El Paso, like the rest of the world, has seen a dramatic increase in average temperatures in recent decades.³ Nine of the hottest 11 years in El Paso’s history have occurred between 2011 and 2020.⁴ The worsening climate crisis represents a serious threat to quality of life in the desert southwest, with extreme drought, deadly heatwaves, massive wildfires, and catastrophic floods already impacting our community.

¹ <https://www.lung.org/research/sota/city-rankings/most-polluted-cities>

² <https://healthoftheair.org/> (El Paso County experienced 16 premature deaths, 87 emergency room visits, and 173,158 impacted days, while Doña Ana County experienced 6 premature deaths, 23 emergency room visits, and 50,960 impacted days).

³ <https://climatexas.tamu.edu/files/ClimateReport-1900to2036-2021Update>

⁴ <https://elpasomatters.org/2020/12/31/2020-was-el-pasos-second-hottest-year-on-record/>

Given these realities, mitigating air pollution and the climate crisis must be top priorities for all policymakers. As the transportation sector is the largest source of greenhouse gas emissions in the United States⁵ and one of the largest contributors to ozone pollution in El Paso,⁶ it is especially critical to focus on these issues in developing transportation policy.

We understand that the MPO does not believe the projects discussed in the Planning Documents will cause or contribute to new exceedances of any air quality standard. However, we are concerned about whether the modeling inputs the MPO used are accurate. For example, it is inappropriate to assume that all of the cars and trucks on our roads will be subject to U.S. emission standards. As you know, many of the cars and trucks that use our roadways are manufactured in Mexico and are not required to comply with these tighter standards. We ask that the MPO provide more information about whether its conformity analysis accounts for the fact that a substantial number of vehicles on our roads are non-U.S. vehicles.

In addition, we ask:

How many air monitors are placed next to highways? Where are they located?

Does the MPO consider this an adequate number of monitors to gather adequate data from which to extrapolate air pollution levels? Why or why not?

The number of trucks is expected to increase. Trucks produce more particulates and other pollutants than passenger vehicles. Please tell us how much of each criteria pollutant trucks cause; how much truck traffic is expected to increase, and how much of that traffic is expected to cross the Bridge of the Americas.

Has the recently announced proposed expansion of the Bridge of the Americas been modeled for both air pollution and traffic as part of the MTP and Conformity reports? If not, why not?

Do the TIP, MTP, and Conformity reports propose any measures to reduce heat island effect? If not, why not? If so, what are they?

Do the TIP, MTP, and Conformity reports include any “green infrastructure”?

B. Building New Highways Will Not Benefit Our Region

Major new roadway projects—like the proposed expansion of I-10 through downtown El Paso—will not benefit our region. The phenomenon of “induced demand” is well documented in the academic literature.⁷ Induced demand occurs because people make short-term decisions

⁵ <https://www.epa.gov/greenvehicles/fast-facts-transportation-greenhouse-gas-emissions>

⁶ https://www.wrapair2.org/pdf/SNMOS_TechnicalSupportDocument_19Oct2016.pdf at 66.

⁷ See Hymel, Kent. (2019, April). If You Build It, They Will Drive: Measuring induced demand for vehicle travel in urban areas. Transport Policy. (Volume 76, pp. 57-66).

about when and where to travel, and longer-term decisions about where to live or construct new homes and businesses, based on the transportation options available. Increased highway capacity encourages people to drive more, and to live further away from city centers, reducing any benefit in terms of reduced congestion. A recent example from Texas is the Katy Freeway project in downtown Houston. This project, which cost \$2.8 billion and expanded the highway to 23 lanes, has actually made congestion *worse*, with morning commutes increasing by 25 minutes between 2011 and 2014, and afternoon commutes increasing by 23 minutes.⁸ The predictable result of building additional roadways in El Paso will be more traffic, more sprawl, more air pollution, and reduced quality of life—particularly for individuals (predominantly from environmental justice populations) that live directly adjacent to these roadways.

In addition, recent developments call into question the assumption that additional roadway capacity is necessary. Telecommuting has become increasingly common as a result of the COVID-19 pandemic. This development, along with the advent of autonomous vehicles and improvements in short-haul drone technology are likely to substantially reduce congestion, even without additional roadway construction.⁹ The MPO must account for the likelihood that these technological and social changes will reduce congestion on their own, obviating the need for additional roadway capacity.

As an alternative to expanding I-10 or undertaking other new roadway construction, the MPO should focus on expanding public transit options, increasing walkability, building more bike lanes, and maintaining and repairing existing infrastructure. Transportation policy that reduces sprawl and instead encourages higher-density development can increase quality of life by reducing pollution, reducing the time and money residents spend on commuting, reducing infrastructure costs for local governments, and preserving open space.

Specifically, we ask:

What percentage of funding in each of the TIP, MTP, and Conformity documents goes toward road maintenance?

What percentage of funding is for new capacity?

www.sciencedirect.com/science/article/abs/pii/S0967070X18301720; see also <https://t4america.org/wp-content/uploads/2020/03/Congestion-Report-2020-FINAL.pdf>.

⁸ <https://cityobservatory.org/reducing-congestion-katy-didnt/>

⁹ <https://mobility.tamu.edu/mip/strategies-pdfs/travel-options/technical-summary/telecommuting-4-pg.pdf> (noting that “[T]elecommuting reduces traffic volumes and congestion during peak times by removing commuters from the road.”); <https://www.nhtsa.gov/technology-innovation/automated-vehicles-safety> (noting that automated vehicles have the potential to reduce traffic congestion); <https://eandt.theiet.org/content/articles/2020/09/driverless-cars-shown-to-ease-traffic-congestion-among-human-driven-vehicles/> (“The addition of a small number of autonomous vehicles (AVs) on the road could help traffic to flow faster, safer and with fewer emissions”); <https://phys.org/news/2019-05-drones-solution-traffic-gridlock.html> (short-haul flights in unpiloted electric flying vehicles could be a key answer to gridlock in major metropolitan areas).

What percentage of funding is for public transit?

What percentage of funding is for projects that will reduce air pollution, especially in the areas around the Chamizal/Bridge of the Americas, Spaghetti Bowl, and I-10 between the Spaghetti Bowl and Downtown?

How many miles of bike lanes are planned, compared to new highway lane capacity? What percentage of funding in each of these same plans goes for bike lanes?

What laws govern the responsibility of the MPO to choose projects that mitigate pollution, noise, vibration, heat, or other negative effects on low-income, minority, or otherwise vulnerable populations historically impacted most by highway infrastructure? How are those laws applied in these TIP, MTP, and Conformity drafts? What percentage of funding in these plans supports environmental justice communities as defined in federal or state law?

C. The MPO Should Work to Expand Access to Electric Vehicle (“EV”) Charging Infrastructure

We appreciate that the MPO has conducted a study to see which areas of the region have gaps with respect to bicycle lane access. We request that the MPO conduct a similar study with respect to EV charging infrastructure, and identify steps that state and local agencies can do to increase accessibility of EV charging infrastructure, including for renters, who are not able to charge their vehicle at home.

Investing in EV charging infrastructure will reduce transportation emissions. With greater EV charging infrastructure, more individuals will feel comfortable buying an EV in the first place. In addition, families that own multiple cars will be able to use their EV more often. Finally, people who own plug-in hybrids will be able to maximize the amount of time they use the zero-emission driving option.

Increasing the availability of EV chargers will also reduce vehicle miles traveled. At present, there are only two level 3 EV charging stations in El Paso—the Tesla supercharger at the intersection of Artcraft Road and I-10, and the Electrify America charger at the intersection of Yarbrough Dr. and I-10. Many areas of El Paso—including downtown—do not even have publicly available level 2 chargers. Thus, individuals who are unable to charge their vehicle at home may have to make special trips across town to charge their vehicle. That means more VMTs. Increasing EV charging infrastructure—with a focus on making it possible for renters to charge—is an important tool for reducing emissions and VMTs that the MPO should prioritize.

Specifically, we ask:

How many electric vehicle charging stations are part of the TIP, MTP, and Conformity draft plans? What percentage of funding goes toward electric vehicle charging stations in each plan?

D. The MPO Should Have Done More Outreach to Affected Communities

The public comment period began Jan. 24. On Jan. 21, the MPO Twitter account, which has 72 followers, posted “How would you make your commute better”? A similar post appeared on the Facebook account, with about double the number of followers. Both were in English only. They did not have a link to the draft, which was discussed at the MPO-TPB the previous Friday, nor a link to the schedule of meetings.

To our knowledge, not one of the MPO-TPB members attended any of the public comment meetings. At the MPO-TPB meeting of Feb. 18, the only opportunity to make comments to MPO-TPB members, the meeting had to be recessed in order to round up a quorum.

The last week of January or the first week of February, the only additional information was a three-tweet Twitter thread describing only the Thursday meeting, and similar information on Facebook (which did post multiple Facebook events for the individual comment meetings). Both again were English only.

None of the MPO-TPB member organizations shared information with the public regarding the TIP, MTP, or “Conformity” documents. In fact, TXDOT made a presentation to City Council on Tuesday, Feb. 1, and didn’t even mention the ongoing public comment process, despite City Representatives stating their concerns with TXDOT outreach on its projects.

The scant information provided on social media was misleading. Transportation is far more than “your commute.” The documents themselves describe the significance of various types of traffic and traffic drivers—such as large trucks and new development—as well as regional aspirations toward a multimodal transportation system that is much more than “your commute.”

As your Public Participation Plan states, all documents have, “as a minimum, 30 days of continuing public review and comment periods.” The MPO must do more than the minimum. Further, the plan states, “every effort is made to accommodate traditionally under-served audiences, including low-income and minority households, and persons with disabilities. . . . In compliance with Environmental Justice requirements, the MPO will respond to the needs of low-income and minority populations by choosing meeting locations, times and formats that are appropriate, accessible and reassuring to affected populations. All accommodations for the visual and/or hearing impaired and Spanish-speaking individuals are provided upon request prior to all public meetings.”

As you know, the neighborhoods most affected by highway facilities include large numbers of Spanish speakers and low-income residents. The MPO appears to have done the minimum outlined in its Public Participation Plan. Given the historic concentration of highway facilities in and around Downtown and the Chamizal, why was more than the minimum not undertaken? Will the MPO commit to ongoing public dialogue with the most affected communities, including creating a community board?

Thank you for accepting these comments and questions. We look forward to your responses.

Sincerely,

David R. Baake
david@baakelaw.com

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delbarriochamizal@gmail.com

Sunrise El Paso
sunriseelpasotexas@gmail.com

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lgibson@utep.edu



COUNTY OF EL PASO
DAVID C. STOUT
COUNTY COMMISSIONER, PRECINCT TWO

March 8, 2022

To Whom It May Concern:

It is my intent to provide public comment for the TIP, MTP, and Conformity public comment process.

As the elected county representative for Central/Downtown/North-East(part)/East (part)/and Lower Valley (part) El Paso, I write to voice my strong opposition to the concept described in the MTP for I-10 Segment 2, known as Downtown 10. My constituents have reached out directly to my office to express their concerns, specifically regarding Reimagine I-10 Segment 2, which is now a project known as Downtown 10. I echo their concerns, and also write to express that I do not believe that Downtown 10 as described should remain in the MTP.

I am concerned for what added lanes and particularly the frontage roads would mean for our community. Please tell me whether the frontage roads would include lanes that are wider than the current streets (Missouri, Yandell, Main, and Wyoming) and whether the speed limits would be higher. While this is not an MPO project, I assume the MPO is privy to the latest details, in order to accurately assess the impact of the project on communities of interest.

The El Paso MPO Title VI program [elpasompo.org/media/TitleVI/EPMPOTitleVIProgram.pdf] states that: *The EPMPO is required by the Federal Highway Administration to implement Title VI of the Civil Rights Act (42 U.S.C 2000d-1). Title VI declares it to be the policy of the United States that discrimination on the ground of race, color, or national origin shall not occur in connection with programs and activities receiving Federal financial assistance, and authorizes and directs the involved Federal departments and agencies to take action to carry out this policy. Title VI prohibits discrimination: whether intentional or where the unintended effect is unduly burdensome.*

Further, it states on Page 9 that: *Public outreach to traditionally under-served groups is made through contact with community leaders and organizations. In addition, efforts are made to invite them into the transportation planning process, to speak at meetings, and place the identified leaders and organizations on the EPMPO's emailing list to receive notifications of meetings, and provide awareness of the EPMPO web-page (www.elpasompo.org) and other relevant information.*

Please state which community leaders and organizations in El Paso the MPO has invited to comment on the TIP, MTP, and Conformity documents. What other efforts have taken place to educate them on the planning process, on Title VI and on their rights. Particularly, what under-served groups in my Precinct, which includes the Chamizal, Lincoln Center, and other neighborhoods next to the Bridge of the Americas, Spaghetti Bowl, and I-10, have been invited



COUNTY OF EL PASO
DAVID C. STOUT
COUNTY COMMISSIONER, PRECINCT TWO

to comment on the draft TIP, MTP, and Conformity documents. Please also state what “Substantive Work” in helping guide the process the MPO has offered to communities most affected by the largest facilities in the network.

On Page 15, with respect to the TIP and MTP, the MPO states that the TIP “*criteria used to identify projects to receive funds includes how well the project provides access for transportation users identified in the President’s Order for Environmental Justice*” and the MTP “*analysis included (1) outreach and meaningful participation from minority and low-income population groups in the development of the plan, and (2) an assessment to determine any discrimination of minority and low-income population groups in the distribution of impacts and benefits associated with the projects and programs advanced in the MTP.*” Please describe how each draft document achieves its respective goals.

On Page 16, it states “*There are three fundamental environmental justice principles:*

- “1. To avoid, minimize, or mitigate disproportionately high and adverse human health and environmental effects, including social and economic effects, on minority populations and low-income populations.*
- “2. To ensure the full and fair participation by all potentially affected communities in the transportation decision-making process.*
- “3. To prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority and low-income populations that address mobility and added capacity projects.”*

Please explain how the draft TIP and draft MTP achieve these goals. Please also describe how these draft documents would meet these goals if the recently announced Port of Entry expansion project was included in either the TIP or the MTP. Please also describe how the draft TIP would meet these goals if the Downtown 10 project was included, as is likely to occur should funding be available.

I am concerned that while the plan calls for connectivity, the access road I see running through Segment 2 would lead to LESS connectivity between the neighborhood north of I-10 and Downtown El Paso. My staff has also done research that indicates that Segment 2 of I-10 is the section of I-10 that experiences the least amount of accidents through the entire corridor. We have found scientific articles that reference road narrowing as a contributing factor to reducing traffic speeds and reducing accidents. While some may claim that the “bottleneck” that is created in Segment 2 needs to be addressed to provide better flow through I-10 in downtown El Paso, I believe the reduction in lanes is actually a positive way to reduce accidents through a section of I-10 that has the turns and curves it has.



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DAVID C. STOUT
COUNTY COMMISSIONER, PRECINCT TWO

Further, as the consultant hired by El Paso County indicates, the bottleneck causing congestion in Segment 2 actually is caused by Segment 3, at the Spaghetti Bowl. The recent I-10 Connect appears to have made the congestion worse by limiting access to the direct connection to the Border Highway. Why is Segment 2 a priority over Segment 3, which is the source of the congestion? I have attached the consultant draft report, and while I understand that the County has revised its comment submission regarding dynamic modeling, I am submitting the request for region-wide dynamic modeling as suggested by the consultant, and would like a written response as to why or why not to implement.

I also would like a written response as to why the County consultant cannot get the 2050 modeling files. The County has been told that state and federal rules do not allow for sharing those files. Please cite exactly what rules those are at both the federal and state level.

Further, I have a question above related to how and whether the Downtown 10 plan is modeled in the TIP if it were to be added as an addendum. During the Commissioners Court meeting of March 7, 2022, I asked whether there would be a 30-day public comment period prior to adding Downtown 10 to the TIP. The answer I received was that there would be an opportunity for public comment. Those are not necessarily the same thing. Please tell me whether there would be a 30-day public comment period prior to amending the TIP by adding Downtown 10.

Finally, it has been brought to my attention that the project known as I-10 Connect has increased idling on the approach to Mexico, and those lines effectively block access to the direct connect to Loop 375/Border Highway. Residents are complaining about increased pollution, noise, and vibrations from this TXDOT project. While it is a TXDOT project, the MPO is the locally accountable body that is a “gatekeeper” for project selection. Given that, my last questions are:

- What role did the MPO play in developing and assessing existing and projected traffic counts, hours of delay due to congestion, and air pollution produced as part of the I-10 Connect project?
- What were the assumptions/projections either generated or adopted by the MPO as part of that project in terms of traffic counts, congestion delays, and air pollution produced, and how do those compare with the results of the project?
- What steps is the MPO taking to assure environmental justice for those affected communities, both in terms of accountability for its role in adopting assumptions as well as in its role as a community convenor to proactively seek information from those affected communities?
- What projects has the MPO prioritized to reduce the disproportionate impact on those communities in the currently proposed TIP and MTP?



COUNTY OF EL PASO
DAVID C. STOUT
COUNTY COMMISSIONER, PRECINCT TWO

- What specific steps will the MPO take to look for and support projects such as mass transit, removing roadways, road diets, or other solutions in the future?

Respectfully,

A handwritten signature in black ink, appearing to read "D.C. Stout", is written over a light blue horizontal line.

David C. Stout
Commissioner, Precinct 2
County of El Paso

From: [peggy hinkle](#)
To: [epmpo](#)
Subject: Public Comment
Date: Wednesday, March 9, 2022 9:44:42 PM

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Peggy Hinkle, 8517 Hopewell Drive, El Paso, TX 79925

My understanding is that my spoken public comment was not recorded or made part of the record. I have repeated many of my previous points as well as adding additional info. Please enter this into the record/distribute to all members of the committee.

As I stated during public comment in a previous meeting, I am absolutely opposed to the proposed widening of I-10 between Cobia and Executive. Below, I share info from your own document, which shows exactly how little gain will be realized by the widening. It also does NOT take into account the increased pollution that will result from more lanes and more cars, affecting not just our overall air quality, but particularly that of those residents who live and work near the freeway.

These are the performance measures included in the MTP, based on outdated standards, rather than forward looking

- Travel Time Index: where the build scenario = just a 3% decrease over the no build
- PM Peak Hour Delay per Capita (in minutes): where even with the build scenario peak delay will still increase, but just not as much as it would (in theory) with the no-build option. But the focus on build v no build is about adding capacity versus prioritizing mode shift and the move to transit
- Average peak-period commuter minutes in EJ zones: and based on the projections here, the time savings would only improve by 1.11% - which suggests the build scenario is a costly waste for a minimal return.
- % of population within ½ mile of high-quality rapid transit stops: which when we consider access to transit will actually decrease under the build scenario means the build model is actually making access worse!
- % of jobs within ½ mile of high quality rapid transit stops: the same holds for access

to jobs!

- % of non-SOV trips **no improvement**
- Average trip costs **increased costs**
- Max daily CO emissions [Ton/Day] **CO emissions up by +15.26% under the build model!**
- Max daily PM10 emissions [Ton/Day] **no improvement**
- Daily VMT Total (million miles) **3.39% increase in VMT**
- Daily VMT per capita **and a 3.59% increase in VMT per capita!**

So for a lot of money we can marginally improve congestion and drive times, while decreasing transit access, and generating even more air pollution!

This is why we need to consider more scenarios, especially more equitable & sustainable scenarios that focus NOT on increasing capacity to address potential demand, but on increasing access to jobs, opportunity and housing through much improved transit, and working with local leaders to adopt more sustainable growth patterns.

Which the MTP says we need to do

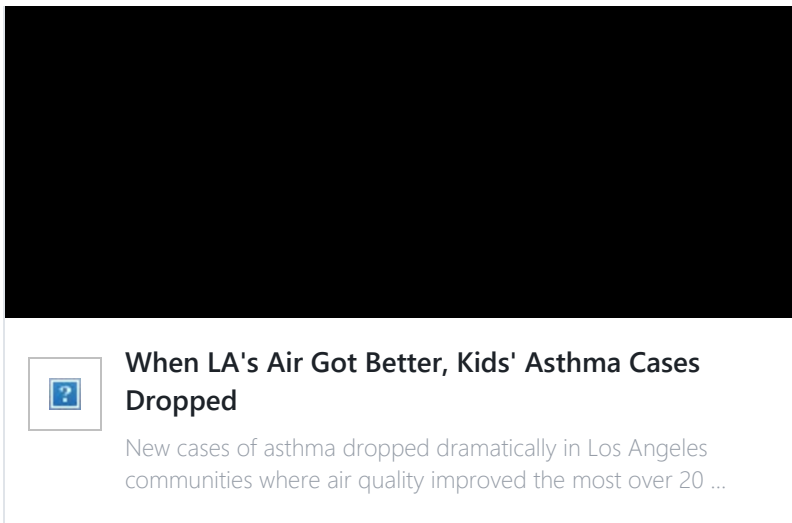
“A major takeaway from the analysis is the significant increase in congestion particularly in the Mission Valley region near the City of Socorro and far east region at the County of El Paso and Horizon City. These congestion patten[n]s are prevalent even with the proposed improvements for RMS 2050 which provides an eye opening to stakeholders to either prevent or avoid the increase demographics by preventing sprawling and/or promoting alternate modes of transportation” [pg. 5-23]

The abysmal result of the freeway to Juarez and 54 North is nothing short of shocking. So poorly planned and executed that traffic basically stops on I-10 going east and going west, starting in the afternoon. Once one is past these exits, traffic moves well. It is obvious that there is no need for more lanes past Cobia.

Here are just a few studies linking poor air quality with poor health (particularly problematic in a city that is already medically underserved):

- [When LA's Air Got Better, Kids' Asthma Cases Dropped](#)





"Garcia wondered whether new cases of asthma would be lower in communities where the air improved the most. The answer was yes, especially for nitrogen dioxide, which is an indicator of tailpipe emissions, and fine particles, which are a major type of pollution from diesel engines."

- <https://www.aarp.org/health/healthy-living/info-2021/loud-noise.html?fbclid=IwAR0rBurLxHHbHrFE-OtpdRyuB4UZn8rqkjEwRt5-CA5EPVIYFs5s34x6aSE>

"An incessantly loud environment stimulates a part of the brain known as the amygdala, which regulates stress response. The brain reacts by increasing blood pressure and levels of a stress-related hormone called cortisol; both are known to cause a host of cardiovascular issues, including stroke, says Douglas M. Hildrew, M.D., medical director of the Yale Hearing and Balance Program. In fact, the American Heart Association warns of an increased risk of heart attack for those who are regularly exposed to excessive noise, the kind found near airports and highways. Chronic stress is also a well-established contributor to deaths related to immune system suppression, diabetes, arterial plaque buildup (atherosclerosis), psychiatric illness and possibly cancer."

- [Ostrow researcher investigates environmental pollution's contribution to birth defects - Herman Ostrow School of Dentistry of USC](#)



Jian Xu hopes to better understand the mechanisms behind environmental toxins increasing the occurrence of birth...

- NEARLY 120,000 BABIES WILL BE BORN with birth defects this year.

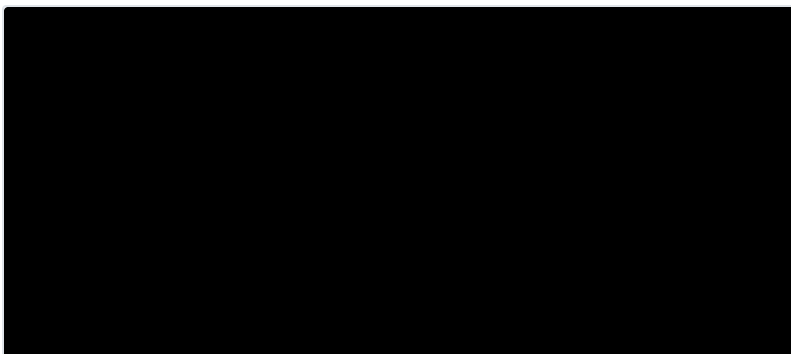
while there are a number of causes – genetics and chromosomal issues, infections during pregnancy, maternal malnutrition and exposure to certain medicines, illicit drugs and alcohol – one well-documented cause is exposure to environmental pollution.

- Traffic-related pollution linked to early markers for cardiovascular disease in children

Daily exposure to auto emissions during childhood may set the stage for cardiovascular disease in later life, according to a [USC Children's Health Study](#) that followed 70 children into young adulthood.

The research, published recently in the journal [Environmental Health](#), used ultrasound to examine the carotid arteries in participants at age 10 and again a decade later. Changes in carotid artery intima-media thickness, or CIMT, is a measure of very early-stage atherosclerosis, the underlying cause of most cardiovascular disease.

“Air pollution exposure has been strongly linked to adverse cardiovascular effects in adults. However, relatively few studies have examined the impact of air pollutants on the cardiovascular health of children and young adults,” said lead author [Shohreh Farzan](#), an environmental epidemiologist at the Keck School of Medicine of USC. “To our knowledge, ours is the first study to evaluate changes in CIMT during the important transition from childhood to early adulthood.”



Traffic-related pollution linked to early markers for cardiovascular dis...

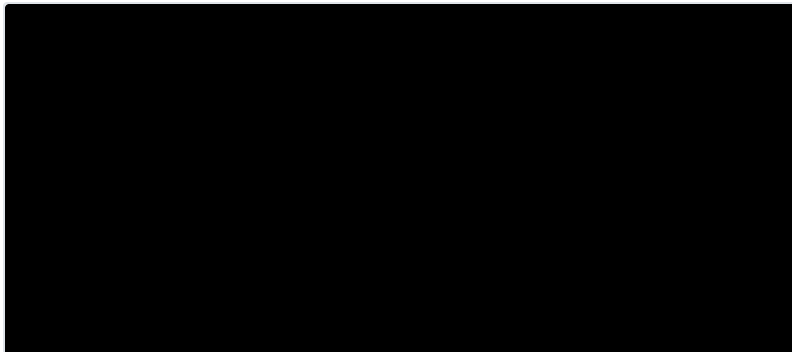
Daily exposure to auto emissions during childhood may set the stage for cardiovascular disease in later life, ac...

Here is some history you may not know about Los Angeles:

“By 1911, Southern Pacific consolidated the entire electric interurban streetcar network of Los Angeles and operated it as the Pacific Electric

Railway Company, whose cars were known as 'Red Cars,'" a historian for the website [usp1001a](#) writes. "Around the same time, the Los Angeles Railway operated a local system of streetcars in central Los Angeles, known as the Yellow Cars."

"For a half-century thereafter, the streetcar was the model and the marvel of the nation's urban mass transit," *Los Angeles Times* historian [Cecilia Rasmussen writes](#). "For the price of a nickel, a dime or two bits, the trolley whizzed over more than 1,100 miles of tracks connecting the Balboa Peninsula in Newport Beach to the San Fernando Valley, and from San Bernardino to Redondo Beach. Tourists rode from downtown to the heights of Mt. Lowe in the San Gabriel Mountains."



From the Archives: Did Auto, Oil Conspiracy Put the Brakes on Trolleys?

It has been 40 years since the last clang-clang-clang of a trolley in Los Angeles.

By the 1920s, Los Angeles had the best public streetcar system in the country. And what happened? Cars and freeways. *"The giant corporations with a stake in cars and buses (consortium of General Motors, Standard Oil, Firestone Tire & Rubber, Phillips Petroleum and Mack Truck Manufacturing Co.) were prosecuted half a century ago by the federal government for conspiring to deep-six the region's streetcars."*

<https://la.curbed.com/2017/9/19/16268026/los-angeles-transportation-history-street-cars>

I grew up in El Paso, leaving in 1973 after graduating from Burges. I moved back in January 2017. For 35 of those years I lived in the San Francisco Bay Area. I saw first hand the lie that advocates of freeways and wider freeways tell us: more lanes will reduce traffic. That never happens, and this is true all over the state and the country. More lanes = more traffic = more pollution. My father lived in LA when I was a child. Even then, in the 1960's, the freeway in LA was a parking lot. It has not improved....

The proposal to widen I-10 between Copia and Executive is a terrible plan, as the independent analyst hired by the County Commissioners found. We share the air with Juarez - there is no way around that. So it is incumbent on us to do everything we can to reduce our emissions and pollution here in the El Paso area. Many residents already suffer poor health due to pollution - the

American Lung Assn says that EP is 13th in ozone pollution - termed a "sun burn for the lungs". I am certain that many of you have at least one health problems, or if not you, members of your families. We need to prioritize public transportation and push TCEQ to push for lower emissions vs their ridiculous statement that there is no point to work on this issue because we have no control over Juarez.

wider freeways only push "induced demand" - more cars on the road is the result. We can instead push "induced demand" for public transportation. Offer more bus service, especially express buses, at the times that residents need service, and they will start to ride the bus and also to depend on it. If filled, each bus could potentially remove up to 50 cars from the roads. My husband rode the bus across the Bay Bridge every work day for 30 years. Google, Facebook, Apple and others offer wired buses all over the bay so that employees can work as they commute.

Do a comprehensive survey of all residents to learn where, why and how often they drive. How can we change public transportation to accommodate residents? Make it convenient enough and inexpensive enough (especially in these days of high gasoline costs) and people will be happy to take public transportation.

Why do we not have carpool lanes as other cities with too many cars and freeways do? Add carpool lanes for 2 or 3 riders to encourage carpooling. Buses would also travel in carpool lanes. Reroute thru traffic onto 375.

MPO, have you released the data the independent analyst needs?

It is your responsibility to consider the most current information from independent analysis, not just that of TXDOT who is only in business to pour concrete and build freeways. It is also your responsibility to consider the impact of more traffic on residents, especially those who live near I-10, as well as increased pollution and our rising heat index. More concrete = more heat. I'm sure that those of you who grew up here would agree that El Paso did not used to be this hot in the summers. We do not want to become another Phoenix.

Recent windy days have forced many residents to stay indoors (two of my relatives have lung problems, they are just two of how many?) - the pollution index was too high all over town. Again, we can't control what other cities do to control traffic and climate - but we DO have control over what we as El Pasoans do.

Please - do the right thing for all residents of the El Paso Metro area - including your own families. Let's become a model for other cities and hopefully leave our children and grandchildren a healthier future.

Peggy Hinkle
510.504.9413
peggyhinkle@yahoo.com

From: [Scott White](#)
To: [epmpo](#)
Subject: RMS Public Comment
Date: Wednesday, March 9, 2022 5:10:18 PM

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To the MPO staff, TPB & TPAC members

I write today to submit public comment on the RMS 2050 Metropolitan Transportation Plan (MTP), RMS 2023-2026 Transportation Improvement Program (TIP), and Transportation Conformity Report (TCR). I appreciate all the time and energy that goes into documents such as these, but at the same time find the results problematic, as I find no coherent and defined vision for achieving the goals laid out in the MTP and TIP, nor see I see a plan of action to ensure we actually improve our air quality in the TCR.

The future of this region is dependent upon these sorts of plans to create the proverbial road map for growth, development and prosperity for our region - and yet what these documents point towards is simply an ad hoc approach to doing more of the same as we have been.

Plan El Paso laid out a grand and aspirational vision for the City of El Paso, calling for the City to become the least car dependent city in the southwest. But, in part because a plan to achieve this goal was not established, El Paso has made little to no progress towards that goal. In a similar fashion, these documents do not chart out how we are to achieve the goals of improving **Safety, Maintenance & Operations, Mobility, Accessibility & Travel Choices, Sustainability, Economic Vitality, Quality of Life, and Implementation.**

But based on the performance measures included in the MTP - Travel Time, Peak Hour Delay, Average peak-period travel time, Proximity to transit stops, Proximity of jobs to transit stops, Mode shift change, Average trip costs, CO emissions, PM10 emissions, Vehicle Miles Traveled, and Vehicle Miles Traveled per capita - that goals like Safety, Maintenance & Operations, and Implementation are not being measured. In fact, as we (Velo Paso) believe safety is a very high priority, any plan that does not measure, reflect or demonstrate how transportation projects will, or will not, makes our streets and roads safer is not acceptable. The Texas transportation Commission and TxDOT have committed to cutting serious and fatal traffic crashes in half by 2035 and to zero by 2050. So where is this MPO's commitment to reach zero serious or fatal traffic crashes by 2050?

Simply saying “we want safer streets’ will not help us achieve that goal, as evidenced by 2021 being one of the deadliest years in Texas transportation history. We need targets, policies and priorities put in place to reach all the goals above, and performance measures that show our progress, or lack thereof in achieving those goals.

The TCR focuses on conformity, but does not chart out ways in which we can or should do more to ensure cleaner air in the future. The TIP lays out the same goals as above, but does not show how the projects listed in the document might help or hinder our progress towards those goals - leading one to question whether there is any actual correlation between our regional goals, and how projects are designed, proposed and selected for inclusion in these planning documents.

We as a community need a clear set of goals from the MPO, and these documents, and a clear path forward for how these goals are to be achieved.

Without such a road map to show us the way, we fear that the aspirational nature of the MTP goals will remain just that, even as we plunge ahead with the hope of change, but the probability of an expensive, unsustainable, and unsafe, automobile-centric status quo.

OUR REAL FUTURE?

Buried in the MTP is what might be seen by most as a throw away line, but it is very telling:

“A major takeaway from the analysis is the significant increase in congestion particularly in the Mission Valley region near the City of Socorro and far east region at the County of El Paso and Horizon City. These congestion patterns are prevalent even with the proposed improvements for RMS 2050 which provides an eye opening to stakeholders to either prevent or avoid the increase demographics by preventing sprawling and/or promoting alternate modes of transportation” [pg. 5-23]

This statement follows TABLE 5-11: Scenario Performance Measure Comparison on page 5-22 of the MTP which shows how the 2050 Build compares to the 2050 No-Build plan. It purports to show how much better the build plan will be than the no-build plan, but upon a closer look, and mindful of the statement that follows this table in the MTP, it should be recognized that the build plan (which will see over \$7 billion spent on primarily capacity projects) will render at best minimal improvements.

When we reconsider the performance measures in Figure 5-11, what we get is

- **Travel Time Index:** the build option would render just a 3% improvement over the no-build option for a minimal improvement.

PM Peak Hour Delay per Capita (in minutes): while the chart shows a 29.17% improvement over the no build option, when we look at the actual time savings, we see just a .14 (mins) time saving, or about 8 seconds per minute for another minimal improvement.

- **Average peak-period commuter minutes in EJ zones:** based on the projections here, the time savings under the build option would offer only a 1.11% improvement.
- **% of population within ½ mile of high-quality rapid transit stops:** now those minimal improvements have become losses as the percentage of the population with access to rapid transit stops would decrease under the build option!
- **% of jobs within ½ mile of high quality rapid transit stops:** as would job sites with close proximity to rapid transit stops!
- **% of non-SOV trips** would not change, meaning there is no increase in people shifting to multimodal options (walking, cycling, or transit)
- **Average trip costs** would increase under the no build plan
- **Max daily CO emissions [Ton/Day]** CO emissions would increase by 15.26% under the build model meaning worse air quality
- **Max daily PM10 emissions [Ton/Day]** with no improvement to PM10 emissions compared to the no-build plan as both are expected to rise by 27%
- **Daily VMT Total (million miles)** with the build plan increasing total VMT by 3.39% over the no-build plan, and
- **Daily VMT per capita** also resulting in a increase over the no-build plan of 3.59%

Or put another way, we will be sinking over \$7 Billion dollars into roadway projects for some marginally improvements, while decreasing transit access, and generating even more air pollution than if we had not built.

This should be called out for what it is, the height of fiscal irresponsibility!

Or looking at our “goals” another way the MTP tells us that despite the minimal benefits to the build plan, we would rather subsidize driving, than make it possible for people to move safely throughout the region.

ROADWAY FUNDING \$7,333,930,659

TRANSIT FUNDING \$1,003,511,595

SAFETY \$19,432,726

This is why we need to return to the question of just what our goals and priorities actually are. The MTP goals included as #1 Safety, but the build option focuses primarily on increasing capacity for cars, with no meaningful benefit. Yet the purpose statement declared that the purpose of the MTP was to understand the future of our region’s transportation needs. We need to be making wise, forward thinking decisions that will significantly benefit our entire region.

The build plan does not do that. Nor does the no build. So perhaps it’s time for a new option, one that considered a range of options to find a better set of solutions - including better land use planning, multimodal planning, and giving people the option to safely, easily, and conveniently walk, bike or take transit so we don’t have to drive so much.

OTHER CONCERNS

Beyond the concerns represented above there are other issues with these documents.

- On the cover art for the MTP, TIP and TCR, as well as all their chapters, were pictures of a junction between a wide, pedestrian and cyclist unfriendly road, and the freeway. These suggest the direction of this process is focused almost exclusively on building and widening roads for cars. Where were the pictures of walkable, bikeable, transit friendly places?
- As part of the hearings with regards to this public comment period, the message given with regard to conformity was that ‘we were passing.’ That is a good thing, but where was the message in those meetings or in the TCR to suggest we could (and should?) do better, and how it could be done. There are a great many people in this region who suffer as a result of air quality issues, and we know transportation plays a major role in producing air quality issues. For all our sakes, we must chart a way to ensure we are all doing what we can to make our air cleaner.
- Also as part of the hearings and within the MTP, maps using percentage growth were used to show where future growth was expected to occur. The problem with this is percentage growth will always be lower in built up areas as there is simply less potential for high percentage growth. Real growth is often much higher in developed areas, and as such should be the measure we are asked to consider. By focusing on

the high percentage change, these maps could be used to justify subsidizing sprawl, as opposed to investing in better access to the areas where people actually work and/or live (which is better represented in density maps).

- These documents are so large, and contain so much data, it is unreasonable to expect the average person to be able to read, much less digest all there is. In the future, for processes of this scale, it might be beneficial to have a Citizens Advisory Committee providing additional input throughout the process to help make the most relevant data and information more accessible to the general public.
- Clarify the definitions of certain commonly used terms like mobility - when some agencies use multimodal, they use it to include the transportation of freight as well as transit, walking and cycling. This is a problematic use as one focuses on the movement of people, the other on goods. These are differing sets of needs with differing expectations and goals. One might ask why certain agencies use multimodal in this fashion.
- The process by which projects are selected for the TIP is not sufficiently transparent. The document lays out a process, but the project information provided as part of the TIP does not reveal the kind of data that would actually measure how that project would help achieve the RMS goals and objectives. If our goal were to make a roadway safer, the project report could show what features (elements, countermeasures, operational speed, etc.) would be used to increase safety for all users.
- Public engagement is an important factor in all such processes. At present, the membership of the TPB is not representative of the full diversity of our region. We recommend the establishment of citizen advisory committees that can speak on behalf of those who are disabled, or walk or bike for transportation, for transit users, or even people who can't drive. Their lived experience would be as valuable as the members of the TPAC in identifying, shaping and selecting projects as underrepresented road users.
- The Environmental Assessment process is crucial to developing projects, but it is finite in its scope. To ensure projects meet the region's needs, the MPO should also study other factors that impact this region, and look beyond project scopes to better appreciate how projects will cumulatively impact the environment, as well as such factors as our health, access to jobs and services, local walkability, and even our community's economic growth opportunities.

-

Our region was built on access outside our region, including the railroads. Are there or has there been any meaningful discussion to not only improve freight rail service within our region by creating a second dedicated east/west or north/south rail line to communities outside our region, so that trains might have a dedicated “lane” as it were to reach their next destination. This could speed up freight service, but also make passenger rail service a more viable option to reach other parts of our state and the country.

- El Paso sits on the Southern Tier cross country bicycle route. Bicycle tourists regularly ride through our region on their way to destinations east and west of El Paso, but they don't often stay here for longer than a night. Bicycle tourism has the potential to fill an unexplored economic gap. When will the region and the MPO make this sort of transportation a priority?
- Vision Zero - even the state has adopted the Road to Zero goal of ending serious and fatal traffic crashes. When will the MPO adopt a similar goal to commit to ending traffic deaths across our region?

A BETTER WAY?

For too long now our approach to transportation planning has been centered on mitigating congestion by adding capacity. It has not worked. We keep spending good money after bad to widen this road or that road, building new roads that only induce more demand, and all the while constantly struggling to make marginal gains in our air quality - without fully acknowledging the harm we've done to our region in the process. We have become so focused on a particular approach, that we've created a culture that can barely imagine any other way to get around the El Paso metropolitan region than by driving. The definition of insanity is to keep doing the same thing and expecting different results - well, we need different results, and we need planning documents that will help us get those results, rather than maintaining the same old approach that just gives us more traffic, sprawl and money down the drain.

The current federal administration has suggested we need to focus on more sustainable approaches, focusing on Repair and Rehabilitation of our roadways first. To update our design standards to focus on a complete streets approach by building in safety and multimodal access as part of the repair and rehabilitation process. And to focus on Operational Efficiency over adding Capacity. To help achieve our 2050 goals, we need to adopt the newer standards, shift away from moving vehicles, to looking at how we can safely, efficiently, and sustainably move people.

The proposed MTP budget allocated \$1 Billion to transit. What if we took the \$7 Billion for roadways and divided that up into a more balanced approach to focus on maintenance,

multimodal transportation, and safety. Reprioritizing those funds with the goal of building a robust regional transit system, creating dedicated bus lanes, protected bike lanes, and safe, accessible sidewalks to provide those options would go a long way to making it easier for everyone to walk, ride, take transit, and even drive. Even a small shift in mode could free up a substantial amount of capacity on our roadways, thus eliminating the need to add capacity, while also improving travel times. This could also result in a huge savings to our community, through a reduction in traffic, and air quality.

But that also means it needs to be acknowledged that the MTP, TIP, and TCR are incredibly flawed documents in that they do not give us the option to go forward with, or even consider these alternate approaches. Educardo Calvo, Executive Director of the El Paso MPO has himself expressed concerns over these documents and suggested they should be seen as a starting point for a discussion. We reject this idea, as the opportunity for discussion should have been the moment the MPO recognized the performance measures did not actually improve our regional transportation system in real and meaningful ways. I myself have been calling on the MPO TPB for years to establish meaningful priorities and goals. Instead, we remain saddled with an ad hoc project selection process, not constrained by those potential goals and priorities, that continues to result in more and more capacity projects which is not what our community - according to the MPO's own vision process - tells us they want.

I hope both the FHWA and the FTA see these flawed documents as an opportunity to allow the EP MPO to do as the community has asked, and as their own goals outline, and create a new long term plan that will show us how the region can not just meet those goals, but perhaps even align with the Plan El Paso goal of making this city (and region) the least car dependant in the southwest.

The MTP even offered us their own version of the Plan El Paso goal with "A seamless and reliable multimodal network which enables connectivity, promotes quality of life and economic wellbeing, and preserves the human environment."

Our region's transportation needs are complex and diverse, but for too long now it appears a one size fits all approach has been used to create an autocentric transportation system that is potentially hostile and unwelcoming for those who don't drive - and even then it has proven quite dangerous even to those in cars. We need and deserve a transportation plan that makes it possible for everyone to have access to opportunity, to move about this region in the mode that best serves their needs, and to safely reach their destination. In short we need not just aspirational goals, but a real, inclusive and multimodal plan for the El Paso region that provides the options we all want and deserve.

I thank you for your hard work in putting these documents together, but also believe we

need a clear plan that shows us how we can achieve the MTP goals, and that we commit to reaching those demonstrable objectives.

I thank you for your consideration

Scott White, CNU-A

Policy Director



Velo Paso Bicycle-Pedestrian Coalition

League Cycling Instructor #4100

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velopaso.org

MPO response to public comment received from Familias Unidas del Chamizal, the Rio Grande Chapter of the Sierra Club, and Sunrise El Paso dated March 9, 2022:

We ask that the MPO provide more information about whether its conformity analysis accounts for the fact that a substantial number of vehicles are non-U.S. vehicles.

The vehicle fleet composition that is used for emissions analysis does not segregate vehicles based on their place of registration. As with most other MPO travel demand models, a percentage of the fleet comes from outside the MPO boundary, which may not fully comply with U.S. motor vehicle emission standards. However, based on the analysis from the MPO's travel demand model, the trips entering El Paso from Juarez (i.e., northbound) represent only 1.8% of the total daily trips in El Paso. Considering that many of the northbound trips are made by vehicles registered in the U.S., which have to comply with U.S. air quality and emission standards, it is estimated that the number of non-U.S vehicles is very small.

How many air monitors are placed next to highways? Where are they located?

Please refer to pages 5-13 of the RMS2050 Metropolitan Transportation Plan page 5-13 that shows the location of air quality monitoring sites in the El Paso region that are part of the Texas monitoring network.

Does the MPO consider this an adequate number of monitors to gather adequate data from which to extrapolate air pollution levels? Why or why not?

TCEQ is the state agency responsible for issues related to air quality monitoring, including location and number of monitors. The MPO relies on TCEQ expertise regarding the monitoring of air quality.

Please tell us how much of each criteria pollutant trucks cause; how much truck traffic is expected to increase, and how much of that traffic is expected to cross the Bridge of the Americas.

The reports that the MPO relies on for transportation air quality modeling of future years do not disaggregate emissions by vehicle class.

Regarding expected increases in truck traffic, for base year 2017, the total number of vehicle-trips in the MPO region was just over 2.4 million/day. Medium and large trucks represented about 8%, just below 200,000 trips/day. By 2050, medium and large truck traffic in the MPO region will increase to over 316,000 trips/day, which corresponds to approximately 10% of total daily vehicle trips.

Regarding BOTA truck traffic, medium and large truck traffic in 2050, approximately 6,000 trips/day will come from all the international border crossings in the region, from Santa Teresa, NM to Tornillo in far east El Paso County). It is expected that approximately 1,800 of these inbound truck-trips/day will come from BOTA.

Has the recently announced proposed expansion of the Bridge of the Americas been modeled for both air pollution and traffic as part of the MTP and Conformity reports? If not, why not?

The recently announced improvements to BOTA are not included in the MPO's documents because there is no detailed information yet about the proposed changes.

Do the TIP, MTP, and Conformity reports propose any measures to reduce heat island effect? If not, why not? If so, what are they?

Not at this time. However, the MPO is open to explore how to incorporate heat island effects as a criteria to select projects in the MTP and TIP.

Do the TIP, MTP, and Conformity reports include any "green infrastructure"?

No. Green infrastructure relate to specific design elements which is beyond the role of the MPO. The MPO can, however, encourage project sponsors to include green infrastructure elements in their projects.

What percentage of funding in each of the TIP, MTP, Conformity documents goes toward road maintenance? What percentage of funding is for new capacity? What percentage of funding is for public transit?

The Transportation Conformity Report does not identify funding, so the response below will focus on what is programmed in the MTP and TIP.

Approximately 38% of the total funds in the RMS 2023-2026 TIP are programmed for Added Capacity projects, 23% for Roadway Operations projects, 22% for Road Maintenance and Rehabilitation projects and Bridges Structure Replacement and Rehabilitation projects, 11% for Public Transportation projects, 4% for ITS projects, and 3% for Bike and Pedestrian projects. Maintenance projects that are funded with local resources (i.e., not federal or state), are not identified in the TIP.

Approximately 57% of the total funding in the RMS 2050 MTP is identified for Added Capacity projects, 20% for Road Maintenance and Rehabilitation projects and Bridges Structure Replacement and Rehabilitation projects, 12% for Public Transportation and Transit Operations projects, 7% for Roadway Operations projects, 3% for Bike and Pedestrian projects, and 1% for ITS projects. Maintenance projects that are funded with local resources (i.e., not federal or state) are not included in the RMS 2050 MTP.

What percentage of funding is for projects that will reduce air pollution, especially in the areas around the Chamizal/Bridge of the Americas, Spaghetti Bowl, and I-10 between the Spaghetti Bowl and Downtown?

The RMS 2023-2026 TIP has 11 projects programmed with Category 5 Congestion Mitigation Air Quality Improvement (CMAQ) funds. The emissions reduction benefits analyses for these projects can be found

in Appendix A of the TIP. These CMAQ projects account for 4% of the total TIP funding programmed. This percentage does not include projects that will reduce air pollution by addressing congestion, as these projects are programmed with other funding categories in the TIP or MTP.

The MPO identifies approximately 17% of total project cost in the RMS 2050 MTP, and approximately 3% of the total TIP funding is programmed to address air pollution in these areas.

How many miles of bike lanes are planned, compared to new highway lane capacity? What percentage of funding in each of these same plans goes for bike lanes?

There is a total of 127 projects in the RMS 2050 MTP, of which approximately 49 projects include bike lanes, bike routes, or shared use paths. There are approximately 103 miles of added bike facility length and 172 miles of added roadway length. This does not consider the number of lanes or whether improvements will be made to both sides of the roadway. Since some added capacity projects include bike lanes in the project scope, it is not possible to extract the cost of the bike lanes from the total project cost to provide a percentage of funding for the RMS 2050 MTP and RMS 2023-2026 TIP.

What laws govern the responsibility of the MPO to choose projects that mitigate pollution, noise, vibration, heat, or other negative effects on low-income, minority, or otherwise vulnerable populations historically impacted most by highway infrastructure?

The MPO follows several federal laws, regulations and procedures that dictate transportation planning and programming activities performed.

How are those laws applied in these TIP, MTP, and Conformity drafts?

The MPO complies with all applicable federal and state laws, regulations, and procedures.

What percentage of funding in these plans supports environmental justice communities as defined in federal or state law?

Determining a percentage of funding tied directly to environmental justice (EJ) communities at the regional level is complex. The MPO models all transportation projects for the entire region as a whole and compares the effects on traffic analysis zones (TAZ) with high numbers of EJ populations with non-EJ TAZs to ensure that there is no disproportionately high adverse environmental effects on EJ communities. The MPO's regional EJ analysis can be found in the RMS 2050 MTP document. At the project level, project sponsors must consider potential impacts to EJ communities part of the NEPA process.

How many electric vehicle charging stations are part of the TIP, MTP, and Conformity draft plans? What percentage of funding goes toward electric vehicle charging stations in each plan?

There are currently no Electric Vehicle Charging Station projects identified in the RMS documents. However, we anticipate projects will be programmed into the MPO documents in the near future using federal funds from new funding programs created through the Bipartisan Infrastructure Bill. The MPO will work with regional stakeholders to maximize the opportunities for these funding programs.

Public outreach comments

The El Paso MPO appreciates your comments regarding the public outreach performed for the RMS 2050 documents. The MPO is always open to suggestions on how to make our processes better and hope that we continue to have active participation from all communities in the region.

MPO Response to County Commissioner Stout letter dated March 8, 2022

“Please tell me whether the frontage roads would include lanes that are wider than the current streets (Missouri, Yandell, Main, and Wyoming) and whether the speed limits would be higher.”

The MPO does not get directly involved with the design details of individual projects, such as Downtown10. That is the responsibility of the project sponsors, TxDOT in this case. The MPO participates as a stakeholder in the evaluation of alternatives phase of the project, which is carried out following the National Environmental Policy Act (NEPA) procedures. Public and stakeholder involvement is encouraged and necessary as part of the NEPA guidelines and procedures. We encourage you to continue participating.

“Please state which community leaders and organizations in El Paso the MPO has invited to comment on the TIP, MTP, and Conformity documents. What other efforts have taken place to educate them on the planning process, on Title VI and on their rights. Particularly, what under-served groups in my Precinct, which includes the Chamizal, Lincoln Center, and other neighborhoods next to the Bridge of the Americas, Spaghetti Bowl, and I-10, have been invited to comment on the draft TIP, MTP, and Conformity documents. Please also state what “Substantive Work” in helping guide the process the MPO has offered to communities most affected by the largest facilities in the network.”

Members of the TPB and TPAC were invited to give feedback on the documents and were encouraged to share the opportunity through their organizations’ individual contacts. In these invitations, notice was given in English and Spanish. In addition to the invitation to community organizations and stakeholders, flyers in English and Spanish were distributed throughout the community, with particular attention paid to Environmental Justice (EJ) areas. These flyers were posted in libraries and community centers. During our monthly TPAC and TPB meetings, we ensured that all information to inform both the public and community leaders was included. Regarding the development of the MTP and TIP, updates were provided at the monthly TPB and TPAC meetings, which are always open to the public, from the start of the development of the documents. The TPB and TPAC include multiple community leaders, who were provided links to the information, invited to comment on the documents, and requests for members to share the information were sent as well. The MPO is always looking at ways of improving its processes and engaging in a manner that is cooperative, comprehensive, and continuous, and we will work with community leaders to ensure that outreach is done to reach all communities. We also encourage interested individuals to participate in the NEPA Process for specific individual projects.

“The El Paso MPO Title VI program [elpasompo.org/media/TitleVI/EPMPOTitleVIProgram.pdf] On Page 15, with respect to the TIP and MTP, the MPO states that the TIP “criteria used to identify projects to receive funds includes how well the project provides access for transportation users identified in the President’s Order for Environmental Justice” and the MTP “analysis included (1) outreach and meaningful participation from minority and low-income population groups in the development of the plan, and (2) an assessment to determine any discrimination of minority and low-income population groups in the distribution of impacts and benefits associated with the projects and programs advanced in the MTP.” Please describe how each draft document achieves its respective goals.”

- (1) During the early stages of the MTP and TIP development, the public had the opportunity to participate and provide input as part of the visioning process.
- (2) An analysis to identify environmental justice (EJ) population was conducted and is presented in the MTP on Page 2-8. In addition, MTP projects potentially impacting the identified

Environmental Justice areas were identified in Page 5-19. Utilizing the travel demand model outputs, a comparison of overall travel times throughout the region were compared to those for EJ areas, and no significant differences were identified such that would disproportionately affect minority and/or low-income populations.

“Please explain how the draft TIP and draft MTP achieve these goals. Please also describe how these draft documents would meet these goals if the recently announced Port of Entry expansion project was included in either the TIP or the MTP. Please also describe how the draft TIP would meet these goals if the Downtown 10 project was included, as is likely to occur should funding be available.”

Added capacity projects within the TIP years have to be justified as part of the Congestion Management Process (CMP), which is a specific requirement mandated by the federal planning process. Sponsoring agencies are asked to provide the corresponding analysis to the MPO as well as specific answers to qualitative questions that provide information on alternate strategies that will help manage congestion.

The recently announced improvements to BOTA are not included in the MPO’s documents because there is no detailed information yet about the proposed changes, such as adding or reducing lanes on the bridge, changes to inspection facilities and procedures, changes in access to/from the bridge for northbound and southbound traffic, et cetera. It is anticipated that the General Services Administration, who will be the sponsor of the BOTA improvement project, will perform a lengthy process that follows the National Environment Policy Act (NEPA). This means that multiple alternatives of the improvements will be developed and evaluated for environmental impacts until a “preferred” alternative is selected, which could take a couple of years. Throughout the NEPA process, there should be ample opportunities for stakeholders and the public to participate and provide comment. As the alternatives development process moves along, the MPO will participate in the analysis of potential changes and impacts to the transportation network regarding congestion, emissions, connectivity, and other criteria to ensure it meets the stated goals in the MPO documents. Once there is sufficient certainty on the details of the “preferred” improvement alternative, the MPO will consider incorporating it into the MTP, TIP and Conformity analysis.

“Why is Segment 2 a priority over Segment 3, which is the source of the congestion? I am submitting the request for region-wide dynamic modeling as suggested by the consultant, and would like a written response as to why or why not to implement.”

The Downtown10 project has become a priority given the urgent need to reconstruct it. The pavement and bridge structures along that segment of I-10 are reaching the end of their design life and need to be replaced.

The MPO did develop a DTA base network for the entire region as a pilot, but its need for details of signalized corridors makes it an impractical tool for regional modeling and a significant challenge for future scenarios. For similar reasons the MPO does not attempt microsimulation of its regional network, although the currently available technology provides the computer power. More than computer power, it is the amount of data required to feed a regional DTA and the challenge of its calibration.

As stated in the FHWA PUBLICATION NO. FHWA-HRT-21-082 (Sept. 2021), isolated models at different levels of resolution have their advantages and disadvantages, and no one model can completely replace another.

Project sponsors are encouraged to use such tools as DTA and/or microsimulators as complement to the TDM for further analysis of specific corridors (considerably smaller sub-areas of the region) and/or projects.

"I also would like a written response as to why the County consultant cannot get the 2050 modeling files. The County has been told that state and federal rules do not allow for sharing those files. Please cite exactly what rules those are at both the federal and state level."

It has been state-wide practice that travel demand models not be released until they are approved, especially in areas designated as non-attainment for air quality. This ensures that there is no confusion among the public as to what model is effective at any time. The 2045 TDM, which is the current and officially approved model, was used to develop the Downtown 10 project, and therefore remains the most appropriate regional model for analysis of the project.

"Please tell me whether there would be a 30-day public comment period prior to amending the TIP by adding Downtown 10."

All amendments to the Transportation Improvement Program (TIP) will follow the requirements from the EPMPO Public Participation Plan (PPP) (Page 12-14). Most amendments to the TIP will have the opportunity to have a 30 calendar day public review period. In some cases, due to urgent modifications of the TIP, the PPP allows a seven calendar day review before adoption by the TPB. In these cases, there will be adequate public notice and clear communication of the abbreviated review period in the TPB meeting agenda.

"• What role did the MPO play in developing and accessing existing and projected traffic counts, hours of delay due to congestion, and air pollution produced as part of the I-10 Connect project?"

The role of the MPO is to estimate traffic volumes for all facilities as part of a regionwide analysis. Traffic information can be extracted from the MPO travel demand model for every link within the network. However, this data is typically not used for specific project development activities, such as a NEPA document, which is the responsibility of the project sponsor. In the case of the I-10 Connect project, that responsibility falls on TxDOT.

"• What were the assumptions/projections either generated or adopted by the MPO as part of that project in terms of traffic counts, congestion delays, and air pollution produced, and how do those compare with the results of the project?"

The MPO does not make assumptions for specific projects. A main input to regional travel models is demographic data (e.g., population, employment and households) for the base year and for future network analysis years. Control totals for the region are developed by the Texas Demographic Center and provided to the MPO. Spatial distribution of the regional control totals throughout the MPO area was done through a Delphi scenario consensus process.

"• What steps is the MPO taking to assure environmental justice for those affected communities, both in terms of accountability for its role in adopting assumptions as well as in its role as a community convenor to proactively seek information from those affected communities?"

The MPO conducted EJ analysis as recommended by federal guidelines. Utilizing the travel demand model outputs, a comparison of overall travel times throughout the region were compared to those for EJ areas, and no significant differences were identified such that would disproportionately affect minority and/or low-income populations.

“• What projects has the MPO prioritized to reduce the disproportionate impact on those communities in the currently proposed TIP and MTP?”

Regional TDM analysis on baseline year did not find any disproportionate impacts of the transportation system on EJ communities. Regional analysis was conducted for all forecast years through 2050, and found similar results in these areas. At the project level, the sponsoring agency is required to perform a more detailed EJ analysis.

“• What specific steps will the MPO take to look for and support projects such as mass transit, removing roadways, road diets, or other solutions in the future?”

The MPO will continue to analyze projects using selection criteria that improves the transportation system.

MPO Response to email from Sunset Heights Neighborhood Association dated March 9, 2022

Dear MPO:

Please accept this public comment on behalf of the Sunset Heights Neighborhood Improvement Association (SHNIA).

As you know, we are concerned about the inclusion of the project known as Downtown 10 in the MTP, and its likely inclusion to the TIP as an amendment after this process.

Question 1: We would like to know, step-by-step, the process of adding Downtown 10 to the TIP once it is funded so it is "financially constrained." If we understand correctly, that means a project is funded, making it eligible. If Downtown 10 is funded, what public comment period or other opportunities are available? How do the environmental justice and other calculations factor into the MPO-developed TIP and MTP calculations for pollution, noise, heat, or other criteria the MPO is required by federal law to address?

For projects in the Texas portion of the EPMP study area to be programmed in the Transportation Improvement Program (TIP), it is necessary that the funding be identified in TXDOT's Unified Transportation Program (UTP). Also, the MPO must ensure all projects in the RMS 2023-2026 TIP are consistent with the current conforming Metropolitan Transportation Plan. Once the project funding is identified, any amendment to the TIP must follow the MPO's Public Participation Plan (PPP), which includes a requirement to have a public comment period. If the Transportation Policy Board (TPB) approves the amendments, the amended project is submitted to the Statewide Transportation Improvement Program (STIP) in the next available quarterly revision for approval from TXDOT and FHWA.

As part of the air quality conformity determination, the MPO follows the code of federal regulations (23 CFR Part 450.324). Impacts of pollution, noise and heat are typically analyzed at the project level by the NEPA process.

Regarding low-income and minority populations, the MPO follows Title VI regulations to make sure these communities are benefited, the same as other communities, by the proposed projects in terms of improved mobility and accessibility. The NEPA process furthers the details and needs of Title VI for project sponsors.

Questions 2: We notice that the "deck park" is in the plan, although it has not been funded. Is this because it is listed as being privately funded? What happens if the funding is distributed through a private or non governmental organization, but the funding itself comes from a government agency? Is this a "workaround" for the requirement projects be funded before being added to the TIP?

Although the Downtown Deck Plaza project is currently identified in the RMS 2050 MTP in FY 2025, it is not programmed in the RMS 2023-2026 TIP. The City of El Paso will conduct a Planning Study which will provide more detailed information about the project including potential scope and a funding/financial plan. It is currently anticipated that that the project will be funded with Private and Public Partnership funds. However, the project may not be programmed into the TIP until there are formal commitments from funding sources for the project.

While we have not taken a position on the deck park, we consistently have expressed concern that the proposal is being used to sell the added lanes and high intensity frontage roads proposed by Downtown 10, or even worse, to "greenwash" the Downtown 10 proposal. We also are concerned that the MPO has taken an advocacy position regarding the deck park, as opposed to similarly advocating for mass transit, eliminating roadways in environmental justice communities, or otherwise mitigating the disproportionate impact of highway facilities on vulnerable communities, including but not limited to residents of Sunset Heights who live closest to the highway.

Questions 3: Excluding the deck park proposal, what are the actual amounts in dollars of total funding in the TIP and MTP drafts for bike lanes, mass transit, safe sidewalks, road repairs, projects that can be considered "mitigation" or "environmental justice," and new road capacity?

In the RMS 2023-2026 TIP, approximately \$335M is programmed for Added Capacity projects, \$201M for Roadway Operations projects, \$195M for Road Maintenance and Rehabilitation projects and Bridges Structure Replacement and Rehabilitation projects, \$98M for Public Transportation projects, \$38M for ITS projects, and \$23M for Bike and Pedestrian projects.

Exclusive of the deck plaza project, in the RMS 2050 MTP, approximately \$4.8B is programmed for Added Capacity projects, \$1.7B for Road Maintenance and Rehabilitation projects and Bridges Structure Replacement and Rehabilitation projects, \$1B for Public Transportation and Transit Operations projects, \$554M for Roadway Operations projects, \$274M for Bike and Pedestrian projects, and \$63M for ITS projects.

Some Added Capacity projects include bike lanes in the project scope and it is not possible to extract the cost of these elements from the total project cost; therefore, they are not included in the bike and pedestrian funding total for the RMS 2050 MTP and RMS 2023-2026 TIP described above.

What are those amounts with the Downtown 10 project included? What are those amounts with the deck park proposal added, and is there a legal or procedural classification for the deck park proposal?

The Downtown Deck Plaza project is listed in the RMS 2050 MTP at a total estimated project cost of \$168.8M; until the planning study is completed, it will not be possible to estimate determine how the total project cost may be broken down into individual elements. We don't believe there is a "procedural classification" however, the project may be considered a Quality-of-Life project with some transportation elements.

SHNIA has consistently raised questions about the impact of Downtown 10 as described by adding lanes and continuous frontage roads to the I-10 facility in terms of added pollution, noise, vibration, and heat that primarily affects low-income and minority residents living in historic neighborhoods. Public comment has continuously opposed the project as proposed, and top responses to MPO surveys include quality-of-life, environmental considerations, and safety. Public comment also consistently focuses on the poor pavement condition of existing streets, "stroads," and roads.

Questions: Congestion management was toward the bottom of criteria in MPO surveys. What is the breakdown of public comments for and against Downtown 10 through the various MPO comment periods regarding Downtown 10 or processes that advance Downtown 10? How are those comments weighted? Why are the top four RMS projects either new roads and/or new capacity? Why are the Downtown 10 alternatives only "build" in various configurations that all add capacity, or "no build"? Why is there no "reconstruct as is" or "reconstruct the Trench only" option? What would be the MPO role in recommending those options be included for study, and will the MPO do so?

The El Paso MPO received a total of 61 comments received during the 45-day public comment period for the RMS 2050 MTP, 2023-2026 TIP and Transportation Conformity Report. 37 comments from 33 unique commenters mentioned the Downtown 10 project, and 33 of those comments expressed opposition to the widening of I-10 near the downtown area.

Comments provided by the public are not weighted; however, a record is provided to the Transportation Policy Board (TPB) for review and approval.

The top four projects identified in the RMS 2020 report were considered by the TPB to be National-Regional Impact, which happen to be highway projects.

The MPO encourages you and all concerned members of the public to participate in the ongoing project development activities being undertaken by the I-10 project sponsor, the El Paso District Office of the Texas Department of Transportation, particularly since your questions are directed at TxDOT.

The policy board of the MPO can issue recommendations to TxDOT as part of the NEPA process.

There is a lack of actual air monitoring data. El Paso is non attainment. It is worst during temperature inversions. We also have a continuous back and forth flow between El Paso and Juarez, which is expected to grow, especially regarding freight.

Questions: What is the baseline emissions inventory based on? Is it the 1994 PM10 Emissions Inventory? If so, is there a more recent inventory that could be used? If so, why is it not being used? How are vehicles from Juarez, especially trucks, which are far more polluting and may not be as well maintained in Mexico, incorporated into the model? How is climate change incorporated into the air pollution models?

Mobile source emissions budgets are established by TCEQ following federal guidelines. As with other MPO study areas, there is a percentage of the fleet that comes from outside the MPO area, a proportion of which may not be in compliance with motor vehicle emissions standards. In the case of the El Paso MPO, vehicles coming northbound from Juarez represent 1.8% of total daily trips in El Paso, which is a conservative estimate given that some of these vehicles are U.S. fleet.

Thank you.

Sito Negron

President, Sunset Heights Neighborhood Improvement Association.

MPO Response to email from Scott White dated March 9, 2022

Thank you for your comments. El Paso MPO staff will provide your comments to the Transportation Policy Board (TPB) for their consideration.

Beyond the concerns represented above there are other issues with these documents.

On the cover art for the MTP, TIP and TCR, as well as all their chapters, were pictures of a junction between a wide, pedestrian and cyclist unfriendly road, and the freeway. These suggest the direction of this process is focused almost exclusively on building and widening roads for cars. Where were the pictures of walkable, bikeable, transit friendly places?

Thank you for your comments and we will keep this in mind for future documents. While similar across the three documents, the cover images are not intended to advocate for a particular type of project. However, pictures of what you are generally describing can be found within the documents themselves.

As part of the hearings with regards to this public comment period, the message given with regard to conformity was that 'we were passing.' That is a good thing, but where was the message in those meetings or in the TCR to suggest we could (and should?) do better, and how it could be done. There are a great many people in this region who suffer as a result of air quality issues, and we know transportation plays a major role in producing air quality issues. For all our sakes, we must chart a way to ensure we are all doing what we can to make our air cleaner.

Regional emissions analyses of transportation plans and improvement programs are developed to ensure that they are consistent with air quality requirements. As mentioned, the conformity report shows that estimated emissions do conform to the budgets.

Also, as part of the hearings and within the MTP, maps using percentage growth were used to show where future growth was expected to occur. The problem with this is percentage growth will always be lower in built up areas as there is simply less potential for high percentage growth. Real growth is often much higher in developed areas, and as such should be the measure we are asked to consider. By focusing on the high percentage change, these maps could be used to justify subsidizing sprawl, as opposed to investing in better access to the areas where people actually work and/or live (which is better represented in density maps).

While one map does show percentage of growth, with larger % values towards the undeveloped fringes, a second map in the same section shows population density, which indicates people still live toward the already developed areas. In contrast, the density can be found more in the central areas. The two maps are intended to contextualize the data and prevent the misinterpretations that may result from presenting either map on its own.

These documents are so large, and contain so much data, it is unreasonable to expect the average person to be able to read, much less digest all there is. In the future, for processes of this scale, it might be beneficial to have a Citizens Advisory Committee providing additional input throughout the process to help make the most relevant data and information more accessible to the general public.

The documents were made available on the EPMPO website for public viewing during the comment period. Several public meetings were also held to provide information and answer questions, as well as recordings of the presentation during the 45-day public comment period in both English and Spanish.

Clarify the definitions of certain commonly used terms like mobility - when some agencies use multimodal, they use it to include the transportation of freight as well as transit, walking and cycling. This is a problematic use as one focuses on the movement of people, the other on goods. These are differing sets of needs with differing expectations and goals. One might ask why certain agencies use multimodal in this fashion.

The MPO focuses on improving overall mobility in the region, including the efficient movement of people and goods. The RMS 2050 MTP describes the challenges of achieving this goal through the development of a multimodal transportation network.

The process by which projects are selected for the TIP is not sufficiently transparent. The document lays out a process, but the project information provided as part of the TIP does not reveal the kind of data that would actually measure how that project would help achieve the RMS goals and objectives. If our goal were to make a roadway safer, the project report could show what features (elements, countermeasures, operational speed, etc.) would be used to increase safety for all users.

Projects are identified based on fiscal constraint and those that are ready to move forward with funding secured and other such details in place in order to be implemented as part of the TIP. These projects were also identified as priority projects from the RMS 2020 and by sponsoring entities.

Public engagement is an important factor in all such processes. At present, the membership of the TPB is not representative of the full diversity of our region. We recommend the establishment of citizen advisory committees that can speak on behalf of those who are disabled, or walk or bike for transportation, for transit users, or even people who can't drive. Their lived experience would be as valuable as the members of the TPAC in identifying, shaping and selecting projects as underrepresented road users.

Thank you for your comments and we will keep this in mind for future documents. The TPB is composed of elected public officials from local governments, membership from the Texas Department of Transportation (TxDOT), the New Mexico Department of Transportation (NMDOT), Texas and New

Mexico State Senators and Representatives, Sun Metro as well as other members. According to the bylaws, additional ad hoc committees of the membership of the TPB may be established and appointed by the Chairperson to assist the TPB in the performance of its function.

The Environmental Assessment process is crucial to developing projects, but it is finite in its scope. To ensure projects meet the region's needs, the MPO should also study other factors that impact this region, and look beyond project scopes to better appreciate how projects will cumulatively impact the environment, as well as such factors as our health, access to jobs and services, local walkability, and even our community's economic growth opportunities.

Thank you for the suggestions. The EPMPO is always looking for ways to improve its processes and engage the public in a manner that is cooperative, comprehensive, and continuous.

Our region was built on access outside our region, including the railroads. Are there or has there been any meaningful discussion to not only improve freight rail service within our region by creating a second dedicated east/west or north/south rail line to communities outside our region, so that trains might have a dedicated "lane" as it were to reach their next destination. This could speed up freight service, but also make passenger rail service a more viable option to reach other parts of our state and the country.

For plans regarding future rail routes, we encourage you to communicate with the various railroad entities such as Burlington Northern and Santa Fe Railway (BNSF) & Union Pacific Railroad (UPRR).

El Paso sits on the Southern Tier cross country bicycle route. Bicycle tourists regularly ride through our region on their way to destinations east and west of El Paso, but they don't often stay here for longer than a night. Bicycle tourism has the potential to fill an unexplored economic gap. When will the region and the MPO make this sort of transportation a priority?

Several projects within the MTP include bicycle facilities such as bike lanes that will expand the regional bicycle network, as well as projects specifically identified as hike and bike trails that vary in length. One such regional project which has been identified as a priority through the RMS 2020 is the Paso Del Norte trail.

Vision Zero - even the state has adopted the Road to Zero goal of ending serious and fatal traffic crashes. When will the MPO adopt a similar goal to commit to ending traffic deaths across our region?

While it is our understanding the City of El Paso is currently looking at such Road to Zero initiatives, the EPMPO would like to be included as part of those discussions as they continue to develop. We are always looking at new ways to improve our planning process and coordinate with others regarding safety.