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TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

October 25, 2022

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

Via Email

Subject: Transportation Conformity Review and Concurrence

Dear Achille Alonzi:

Thank you for the opportunity to review the *Transportation Conformity Report* and supporting documents for the Destino 2050 Metropolitan Transportation Plan (MTP) and Destino 2023-2026 Transportation Improvement Program (TIP) developed by the El Paso Metropolitan Planning Organization (EPMPO). The Texas Commission on Environmental Quality (TCEQ) is satisfied that all requirements are met and transportation conformity is demonstrated.

The purpose of this conformity analysis was to determine if the EPMPO's 2050 MTP and the 2023-2026 TIP are consistent with transportation conformity emissions requirements for the El Paso carbon monoxide (CO) National Ambient Air Quality Standard (NAAQS) maintenance area, the El Paso coarse particulate matter (PM₁₀) NAAQS nonattainment area, and the El Paso-Las Cruces, Texas-New Mexico 2015 eight-hour ozone NAAQS nonattainment area. The El Paso CO NAAQS maintenance area is subject to a limited maintenance plan, so no regional emissions analysis is required for conformity.

PM₁₀ Conformity

For the El Paso PM₁₀ NAAQS nonattainment area, the EPMPO performed a motor vehicle emissions budget (MVEB) test (40 CFR §93.118) comparing projected emissions from the area's transportation system for analysis years 2022, 2032, 2040, and 2050. The 1991 PM₁₀ MVEB—12.05 tons per day (tpd)—was adopted as part of the *PM₁₀ State Implementation Plan for Moderate Area - El Paso* and approved for transportation conformity purposes by the United States Environmental Protection Agency (EPA) effective February 17, 1994. The EPMPO demonstrated that projected on-road mobile emissions were less than the PM₁₀ MVEB.

Ozone Conformity

The EPMPO performed nitrogen oxides (NO_x) and volatile organic compounds (VOC) MVEB tests for the El Paso County portion of the 2015 ozone NAAQS nonattainment area. The 1996 NO_x MVEB—39.76 tpd—and VOC MVEB—36.23 tpd—were adopted as part of the *Section 818 Demonstration for the El Paso Ozone Nonattainment Area SIP Revision* and found adequate for transportation conformity purposes by the EPA on January 12, 1998. The EPMPO demonstrated that projected on-road mobile emissions were less than the NO_x and VOC MVEBs, and the demonstration applies only to the El Paso County portion of the 2015 ozone NAAQS nonattainment area.

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The EPMPO performed NO_x and VOC no-greater-than-baseline interim emissions tests (40 CFR §93.119) for the Doña Ana County portion of the 2015 ozone NAAQS nonattainment area. The New Mexico Environment Department assesses conformity demonstrations for the Doña Ana County portion of the nonattainment area; however, because certain TCEQ 2017 base year emissions inventory data were used for the analysis, we reviewed those elements in the *Transportation Conformity Report* and supporting documents for the EPMPO's 2050 MTP and the 2023-2026 TIP. We support an approval finding by the Federal Highway Administration-Federal Transit Administration.

If you have questions about our review, please contact Jamie Zech of my staff at 512-239-3935 or jamie.zech@tceq.texas.gov.

Sincerely,



Donna F. Huff, Deputy Director
Air Quality Division

cc: Jose Campos, Federal Highway Administration
Guy Donaldson, U.S. Environmental Protection Agency
Doug Booher, Texas Department of Transportation
Jessica Butler, P.E., Texas Department of Transportation
Eduardo Calvo, AICP, El Paso Metropolitan Planning Organization