



**RMS 2050 MTP & RMS 2023-2026 TIP**

# **TRANSPORTATION CONFORMITY REPORT**

**MARCH 25, 2022**



**El Paso Metropolitan Planning Organization**



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EL PASO METROPOLITAN PLANNING ORGANIZATION  
TRANSPORTATION POLICY BOARD

RESOLUTION ADOPTING THE TRANSPORTATION CONFORMITY REPORT FOR  
THE RMS2050 METROPOLITAN TRANSPORTATION PLAN (MTP) AND  
RMS 2023-2026 TRANSPORTATION IMPROVEMENT PROGRAM (TIP)  
FOR THE PARTICULATE MATTER NONATTAINMENT AREA,

AND THE DESIGNATED EL PASO-LAS CRUCES, TEXAS-NEW MEXICO NONATTAINMENT AREA UNDER THE 2015  
OZONE NATIONAL AMBIENT AIR QUALITY STANDARD

A conformity determination has been made that the proposed Metropolitan Transportation Plan (MTP) and Transportation Improvement Program (TIP) have met the requirements for Particulate Matter of 10 Microns or less in size ( $PM_{10}$ ), and Ozone ( $O_3$ ) reductions set forth in the U.S. Environmental Protection Agency's (EPA's) final rule on conformity. Therefore, the MTP and TIP have been determined to:

- (i) be consistent with the most recent estimates of mobile source emissions;
- (ii) provide for expeditious implementation of transportation control measures in the applicable implementation plan;
- (iii) meet the requirements of the Transportation Conformity Guidance for 2015 Ozone National Ambient Air Quality Standards (NAAQS) Nonattainment Areas, and
- (iv) contribute to annual emissions reductions consistent with sections 182(b)(1) and 187(a)(7) with respect to  $PM_{10}$  and  $O_3$ .

It is therefore shown that the El Paso Metropolitan Planning Area's RMS 2050 MTP and the RMS 2023-2026 TIP are in conformity under the Federal Clean Air Act Amendments of 1990 (FCAA).

A blue ink signature of Walter L. Miller, consisting of several loops and a long horizontal stroke.

Walter L. Miller

03/25/2022

Date

Chair, Transportation Policy Board

El Paso Metropolitan Planning Organization

A blue ink signature of Tomas Trevino, featuring a large, stylized initial 'T' and 'T'.

Tomas Trevino, P.E., District Engineer

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Texas Department of Transportation-El Paso District

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Trent Doolittle, P.E., District Engineer

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## GLOSSARY OF ABBREVIATIONS

|                |  |
|----------------|--|
| <b>APU</b>     | Auxiliary Power Unit   |
| <b>ATP</b>     | Anti-Tampering Program   |
| <b>ATR</b>     | Automatic Traffic Recorder   |
| <b>CD</b>      | Compact Disc   |
| <b>CFR</b>     | Code of Federal Regulations  |
| <b>CMAQ</b>    | Congestion Mitigation & Air Quality Program                        |
| <b>CMP</b>     | Congestion Management Process                                      |
| <b>CNG</b>     | Compressed Natural Gas   |
| <b>CO</b>      | Carbon Monoxide  |
| <b>DPS</b>     | Department of Public Safety  |
| <b>EMFAC</b>   | Emissions Factor Model   |
| <b>EMSCALC</b> | Emissions Calculation Program                                      |
| <b>EPA</b>     | U.S. Environmental Protection Agency                               |
| <b>EPMPO</b>   | El Paso Metropolitan Planning Organization                         |
| <b>FCAA</b>    | Federal Clean Air Act and Federal Clean Air Act Amendments of 1990 |
| <b>FHWA</b>    | Federal Highway Administration                                     |
| <b>FTA</b>     | Federal Transit Administration                                     |
| <b>FY</b>      | Fiscal Year  |
| <b>GC</b>      | Gas Cap  |
| <b>HC</b>      | Hydrocarbons   |
| <b>HDV</b>     | Heavy-Duty Vehicle   |
| <b>HPMS</b>    | Highway Performance Monitoring System                              |
| <b>I/M</b>     | Inspection/Maintenance Program                                     |
| <b>LDV</b>     | Light Duty Vehicle   |
| <b>LOS</b>     | Level of Service   |
| <b>LPG</b>     | Liquefied Petroleum Gas  |



|               |   |
|---------------|---|
| <b>MOBILE</b> | EPA-approved emissions modeling software    |
| <b>MOVES</b>  | MOtor Vehicle Emission Simulator            |
| <b>MOSERS</b> | Mobile Source Emission Reduction Strategies |
| <b>MPO</b>    | Metropolitan Planning Organization          |
| <b>MTP</b>    | Metropolitan Transportation Plan            |
| <b>MVEB</b>   | Motor Vehicle Emission Budget               |
| <b>NAAQS</b>  | National Ambient Air Quality Standards      |
| <b>NEPA</b>   | National Environmental Policy Act           |
| <b>NMDOT</b>  | New Mexico Department of Transportation     |
| <b>NMED</b>   | New Mexico Environment Department           |
| <b>NOx</b>    | Nitrogen Oxides                             |
| <b>OBD</b>    | On-Board Diagnostics                        |
| <b>PM2.5</b>  | Particulate Matter 2.5 Microns or Less      |
| <b>PM10</b>   | Particulate Matter 10 Microns or Less       |
| <b>PPP</b>    | Public Participation Program                |
| <b>RVP</b>    | Fuel Reid Vapor Pressure                    |
| <b>ROW</b>    | Right of Way                                |
| <b>SHI</b>    | Source-hours-extended-idling                |
| <b>SHO</b>    | Source hours operating                      |
| <b>SHP</b>    | Source-hours-parked                         |
| <b>SIP</b>    | State Implementation Plan                   |
| <b>STBGP</b>  | Surface Transportation Block Grant Program  |
| <b>SUT</b>    | Source use types                            |
| <b>TAZ</b>    | Traffic Analysis Zone                       |
| <b>TERM</b>   | Transportation Emission Reduction Measures  |
| <b>TCM</b>    | Transportation Control Measure              |
| <b>TCEQ</b>   | Texas Commission on Environmental Quality   |
| <b>TCR</b>    | Transportation Conformity Report            |



|                       |  |
|-----------------------|--|
| <b>TDM</b>            | Travel Demand Model  |
| <b>TIP</b>            | Transportation Improvement Program                                   |
| <b>TMA</b>            | Transportation Management Area                                       |
| <b>TPAC</b>           | Transportation Project Advisory Committee                            |
| <b>TPB</b>            | Transportation Policy Board  |
| <b>TransCAD</b>       | Transportation GIS Software  |
| <b>TRANSVMT</b>       | Utility post-processing TDM  |
| <b>TRIPCAL6</b>       | Trip Generation Program  |
| <b>TSI</b>            | Two-Speed Idle   |
| <b>TTI</b>            | Texas A&M Transportation Institute                                   |
| <b>TWG</b>            | Technical Working Group  |
| <b>TxDMV</b>          | Texas Department of Motor Vehicles                                   |
| <b>TxDOT</b>          | Texas Department of Transportation                                   |
| <b>TxDOT TP&amp;P</b> | Texas Department of Transportation Planning and Programming Division |
| <b>UE</b>             | User equilibrium   |
| <b>UPWP</b>           | Unified Planning Work Program  |
| <b>USC</b>            | United States Code   |
| <b>UTP</b>            | Unified Transportation Program                                       |
| <b>VMEP</b>           | Voluntary Mobile Emissions Reduction Programs                        |
| <b>VMT</b>            | Vehicle Miles Traveled   |
| <b>VOC</b>            | Volatile Organic Compounds   |



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## EXECUTIVE SUMMARY

The air quality conformity analysis performed for the RMS 2050 Metropolitan Transportation Plan (MTP) and the RMS 2023-2026 Transportation Improvement Program (TIP) demonstrates that the projected emissions of Particulate Matter 10 Microns or Less ( $PM_{10}$ ) conform to the Motor Vehicle Emissions Budget (MVEB) enacted by the Texas Commission on Environmental Quality (TCEQ) and approved by the U.S. Environmental Protection Agency (EPA). For the purpose of this conformity determination, and per guidance from the consultative partners, regional emissions analysis for Carbon Monoxide (CO) was not conducted, based upon the EPA approval of the El Paso CO Limited Maintenance Plan (LMP) in September 2017. In accordance with the CO LMP, a regional emissions analysis for analysis years beyond 2020 is not required. In addition, the air quality conformity analysis demonstrates that the projected emissions of Volatile Organic Compounds (VOC) and Nitrogen Oxides (NOx) (Ozone) for the non-attainment area meet the requirements approved by the EPA for the 2015 Ozone National Ambient Air Quality Standard (NAAQS). Per guidance from the consultative partners, an interim emissions test no-greater-than baseline-year was developed for the portion of Doña Ana County near Sunland Park, NM non-attainment area and a budget test was developed for El Paso County using previously approved budgets established under the 1979 one-hour ozone NAAQS.

This transportation conformity analysis was obtained by projecting vehicle miles and hours traveled from the Transportation GIS Software (TransCAD) Travel Demand Model (TDM), calculating emissions of these vehicles using the Motor Vehicle Emission Simulator (MOVES2014b) (latest release December 2018) and AP-42 section 13.2.1 models (EPA, January 2011), and

comparing the results to the MVEB for the County of El Paso, Texas for the VOC, NOx and PM10 pollutants, and comparing the results of the 2017 baseline year against the analysis years 2022, 2032, 2040 and 2050 according to the interim emissions test no-greater-than-baseline-year for the portion of Doña Ana County near Sunland Park, NM non-attainment area .

The RMS 2050 MTP is a 28-year plan with approximately \$8B of multimodal projects and programs included in fiscal years (FY) 2022-2050. The El Paso Metropolitan Planning Organization (EPMPO) study area stretches across the state line between Texas and New Mexico, including El Paso County in Texas, Southern Doña Ana County, and a portion of Otero County in New Mexico. Facilitating the movement of people and goods throughout the region over this period of time presents numerous challenges from a financial standpoint. Projects and programs in the Texas portion of the EPMPO study area are approximately \$7B. Transit projects come to approximately \$1B. New Mexico projects total approximately \$356M. See Appendix C, for the financial summary and project list, which demonstrates a thorough comparison of project revenues and associated project costs in the RMS 2050 MTP.

The RMS 2050 MTP, RMS 2023-2026 TIP and Transportation Conformity Report were presented to the EPMPO Transportation Policy Board (TPB) on Friday, March 25<sup>th</sup> 2022 for adoption.

## NETWORKS

The TDM has a validated 2017 base year and forecast network years of 2022, 2032, 2040 and 2050. The forecast years incorporate projects currently in the MTP and TIP. The model outputs were then sent to the Texas A&M Transportation Institute (TTI) for emissions analysis.



## CONFORMITY REQUIREMENTS

The TCEQ and New Mexico Environment Department (NMED) prepared State Implementation Plans (SIPs), as described in the following subsections. On June 15, 2022, the TCEQ approved proposal of the 2015 Eight-Hour Ozone NAAQS Emissions Inventory SIP Revision for the El Paso County portion of the El Paso-Las Cruces, Texas-New Mexico Nonattainment Area.

### EL PASO CO LIMITED MAINTENANCE PLAN

There have been no monitored violations of the CO eight-hour standard since 2001. The maintenance plan approved by EPA in August 2008 (effective on October 3, 2008), demonstrates that El Paso will remain in attainment of the CO standard for at least ten years following EPA approval. This maintenance plan includes a commitment to submit a second 10-year maintenance plan two years before the end of the first 10-year maintenance plan period. This was satisfied by a limited maintenance plan that was adopted by the TCEQ September 7, 2016 and approved by EPA September 8, 2017, effective October 10, 2017. The maintenance plan ensures that the area remains in attainment of the CO standard. The maintenance area boundary is described in the EPA Green Book as follows: “That portion of the City of El Paso bound on the north by Highway 10 from Porfirio Diaz Street to Reynolds Street, Reynolds Street from Highway 10 to the Southern Pacific Railroad lines, the Southern Pacific Railroad lines from Reynolds Street to Highway 62, Highway 62 from the Southern Pacific Railroad lines to Highway 20 and Highway 20 from Highway 62 to Polo Inn Road; bound on the east by Polo Inn Road from Highway 20 to the Texas Mexico border; bound from the south by the Texas-Mexico border from Polo Inn Road to Porfirio Diaz Street;

and bound on the west by Porfirio Diaz Street from the Texas-Mexico border to Highway 10.”

### PM<sub>10</sub> SIP

The TCEQ submitted “Revisions to the State Implementation Plan (SIP) for Inhalable PM<sub>10</sub>: 1991 PM<sub>10</sub> SIP for Moderate Area - El Paso” to the EPA in 1991. The EPA approved the SIP submittal in 1994. The PM<sub>10</sub> non-attainment area described in the EPA Green Book is the City of El Paso.

### NEW MEXICO PM<sub>10</sub> SIP

Anthony, New Mexico, in Doña Ana County, was designated as non-attainment for the PM<sub>10</sub> 24-hour NAAQS in 1991. Part of the PM<sub>10</sub> Moderate Area SIP Guidance requires anthropogenic (man-made) source categories with significant emissions to be analyzed for technical and economic feasibility of implementing control measures. A copy of New Mexico’s PM<sub>10</sub> SIP is included in Appendix A. There is no PM<sub>10</sub> budget established for Anthony, NM, however, an air quality assessment may be conducted on an individual project basis, in coordination with the New Mexico consultative partners, to examine the potential effects on PM<sub>10</sub> within the Anthony, NM PM<sub>10</sub> non-attainment area.

The non-attainment area is described in the EPA Green Book as the following: “The area bound by Anthony Quadrangle, Anthony, New Mexico - Texas. SE/4 La Mesa 15’ Quadrangle, N3200 - W10630/7.5, Township 26S, Range 3E, Sections 35 and 36 as limited by the New Mexico - Texas State line on the south”.



## NEW MEXICO OZONE SIP

Doña Ana County historically had air quality problems, including particulate matter and ozone pollution. In 1995, the EPA declared a 42 square-mile region in the southeast corner of the County on the border of Texas and Mexico as a marginal nonattainment area for the 1-hour ozone standard. The nonattainment area included the City of Sunland Park, and two census designated places, Santa Teresa, and La Union. Sunland Park was officially designated as nonattainment for ozone in a Federal Register announcement published June 12, 1995 (60 FR 30789).

On April 30, 2004, EPA designated the Sunland Park area as attainment of the 1997 8-hour ozone standard. As part of implementation of the 1997 8-hour ozone standard, EPA revoked the 1-hour ozone standard in 2004. Due to this revocation, New Mexico was required to provide a 10-year [maintenance plan](#) for the Sunland Park 1997 8-hour ozone attainment area under section 110(a)(1) of the Clean Air Act. Motor vehicle emissions budgets were not required under the 110(a)(1) maintenance plan, and therefore none were developed or approved.

On October 1, 2015, the EPA revised the 8-hour Ozone NAAQS ([73 FR 16436](#)), from 0.075 parts per million (ppm) to 0.070 ppm ([80 FR 65292](#)). In 2016, New Mexico Environment Department (NMED) [recommended](#) that EPA designate a portion of Doña Ana County near Sunland Park, NM as nonattainment (Appendix A). Based on 2014-2016 ozone monitoring data, EPA designated the area as a marginal nonattainment area on June 4, 2018 (Effective August 3, 2018) ([83 FR 25776](#)).

The Sunland Park baseline emissions inventory and emissions statement SIP Revision and Certification was submitted to EPA September 10, 2020 and approved October 15, 2021 (86 FR 57388).

NMED's nonattainment new source review (NNSR) permitting requirements (20.2.79 NMAC; Permit-Nonattainment Areas) SIP Revision was amended by the Environmental Improvement Board on June 25, 2021 and submitted to EPA July 30, 2021 for approval in meeting the 2015 O<sub>3</sub> NAAQS. Please note that adoption of Reasonably Available Control Technologies (RACT) is not required for marginal ozone nonattainment areas and NMED has not included these in its SIP Revisions.

## EL PASO OZONE SIP

As a result of the Federal Clean Air Act and Federal Clean Air Act Amendments of 1990 (FCAA), El Paso County was designated nonattainment for the one-hour ozone NAAQS of 0.12 ppm. El Paso County was classified as a serious nonattainment area with an attainment deadline of November 15, 1999. Plans to reduce emissions of volatile organic compounds by 15% in El Paso County were submitted in 1993 and 1994.

In September 1994, the Texas Natural Resource Conservation Commission (TNRCC), a predecessor to the TCEQ, adopted a §818 demonstration for the El Paso area. Section 818 of the 1990 FCAA amendments included a new FCAA, §179B, containing special provisions for nonattainment areas affected by emissions from outside the United States. Under §179B, the EPA could approve a SIP revision for the El Paso area if the plan would achieve timely attainment of the NAAQS but for emissions from Mexico. Modeling showed that El Paso could attain the NAAQS with the planned 15% reduction in emissions from the United States side of the border alone. On July 24, 1996, the TNRCC adopted the one-hour ozone SUPER SIP which included changes to the 15% rate of progress demonstration for the El Paso nonattainment area as well as changes to the §818 attainment demonstration.





In 1997, the one-hour ozone standard was replaced by the more protective eight-hour ozone standard. The one-hour standard has been revoked in all areas, although some former one-hour ozone nonattainment areas have continuing obligations to comply with the anti-backsliding requirements described in 40 Code of Federal Regulations (CFR) 51.905(a).

On April 15, 2004, the EPA designated El Paso County attainment (effective June 15, 2004) for the 1997 eight-hour ozone NAAQS of 0.08 ppm. Monitors in El Paso County at that time showed attainment of both the one-hour and eight-hour ozone NAAQS. The EPA's Phase I Implementation Rule for the eight-hour ozone standard directed that areas designated nonattainment for the one-hour ozone standard but attainment for the eight-hour ozone standard submit a federal Clean Air Act (FCAA), §110(a)(1) maintenance plan for the 1997 eight-hour ozone standard by June 15, 2007. The TCEQ submitted this maintenance plan to the EPA on January 20, 2006. On January 15, 2009, the EPA proposed approval of the El Paso ozone maintenance SIP revision (74 FR 2387). The EPA did not receive any adverse comments regarding the maintenance plan approval; the plan became effective on March 16, 2009.

On May 10, 2019, the TCEQ submitted the El Paso One-Hour Ozone Redesignation Request and Maintenance Plan SIP Revision to the EPA that includes a request that the El Paso area be formally redesignated to attainment for the one-hour ozone standard. The EPA has taken the position that it lacks the authority to redesignate areas to attainment under revoked standards. Therefore, on September 25, 2020 the commission approved to withdraw the SIP revision from EPA consideration (Non-Rule Project No. 2020-040-SIP-NR).

On May 21, 2012, the EPA published in the Federal Register final designations for the 2008 eight-hour

ozone standard (77 FR 30088). El Paso County was designated attainment/unclassifiable under the 2008 eight-hour ozone NAAQS, effective July 20, 2012.

On February 16, 2018, the United States Court of Appeals for the District of Columbia Circuit issued an opinion in the case South Coast Air Quality Management District vs. EPA, 882 F.3d 1138 (D.C. Cir. 2018). The court vacated portions of EPA's final 2008 eight-hour ozone standard SIP requirements rule, which revoked the 1997 eight-hour ozone NAAQS.

On October 1, 2015, EPA revised the primary and secondary eight-hour ozone standards to 0.070 parts per million (ppm). The 2015 eight-hour ozone NAAQS became effective on December 28, 2015 (80 FR 65291). On June 4, 2018, the EPA designated El Paso County as attainment/unclassifiable, effective August 3, 2018 (83 FR 25776).

In August 2018, the City of Sunland Park, New Mexico and environmental petitioners challenged the EPA's attainment/unclassifiable designation for El Paso County. On July 10, 2020, the D.C. Circuit Court of Appeals issued its opinion to remand (without vacatur) the El Paso County attainment designation to the EPA and require the EPA to issue a revised El Paso County designation for the 2015 eight-hour ozone NAAQS as expeditiously as practicable. On December 21, 2020, the TCEQ submitted supplemental information to the EPA in support of retaining El Paso County's original attainment designation. The EPA sent a 120-day letter to Texas on May 25, 2021 notifying the governor that the EPA intends to modify the designation for El Paso County to nonattainment as part of the existing Doña Ana partial-county (Sunland Park) ozone nonattainment area. On July 26, 2021, the TCEQ submitted a response requesting that the EPA not modify El Paso County's



existing attainment/unclassifiable designation consistent with all the information submitted by the state.

On November 30, 2021 EPA published the final action revising the initial air quality designations for two counties associated with two nonattainment areas. In response to the D.C. Circuit Court of Appeals opinion, the EPA re-evaluated the designations for the remanded counties by applying a uniform, nationwide analytical approach and interpretation of the designation provisions of the Clean Air Act (CAA) in considering the specific facts and circumstances of the areas using only data and information available at the time of the original designations. In the final action, the EPA revised the boundaries of two nonattainment areas, affecting the designation status of two counties in two separate states (Colorado and Texas). The EPA reconsidered its designation for El Paso County and changed the boundary for the previously designated New Mexico nonattainment area to include El Paso County, creating the El Paso-Las

Cruces, Texas-New Mexico ozone nonattainment area (Effective on December 30, 2021).

## REGIONAL EMISSIONS ANALYSIS

Regional emissions analyses of transportation plans and improvement programs are developed to ensure that they are consistent with air quality requirements. The analysis for the EPMPO nonattainment areas accounts for emissions resulting from the EPMPO's MTP and TIP, including all regionally significant projects, and the effects of emission control programs.

## MOTOR VEHICLE EMISSIONS BUDGETS

The PM<sub>10</sub> MVEB applies to El Paso County. In accordance with the CO Limited Maintenance Plan (LMP) in September 2017, a regional emissions analysis for analysis years beyond 2020 is not required, and CO budget was not applied. The one hour Ozone (VOCs and NOx) MVEBs applies to El Paso County.

**TABLE 1: MOTOR VEHICLE EMISSIONS BUDGETS FOR OZONE AND PM10 NON-ATTAINMENT AREAS**

|                | NOx                     | VOCs                    | PM10                    |
|----------------|-------------------------|-------------------------|-------------------------|
| Classification | Marginal Non Attainment | Marginal Non Attainment | Moderate Non Attainment |
| MVEB tons/day  | 39.76 <sup>1</sup>      | 36.23 <sup>1</sup>      | 12.05 <sup>2</sup>      |

1) Transportation Conformity: Motor Vehicle Emissions Budgets (MVEB) (Appendix A: El Paso Ozone)

2) Transportation Conformity: Motor Vehicle Emissions Budgets (MVEB) (Appendix A: El Paso PM-10)



As Doña Ana County does not have an adequate or approved budget, an interim budget test was used. On June 22<sup>nd</sup>, 2021 the EPMPO hosted a consultative partners conference call to request guidance as it relates to the 2015 Ozone NAAQS designation for Sunland Park, New Mexico non-attainment area: interim emissions test and demonstration years. For the purpose of this conformity determination per guidance from the consultative partners, a no-greater-than-baseline year test was performed and baseline year 2017 was compared with the analysis years 2022, 2032, 2040 and 2050 for Doña Ana non-attainment area.

## CONFORMITY TESTS

On January 7, 2021, EPA announced the Official Release of the MOVES3 Motor Vehicle Emissions Model for SIPs and Transportation Conformity analyses in states other than California. This announcement started a two-year transportation conformity grace period that ends on January 9, 2023. After this date, MOVES3 model will need to be used as the latest EPA emissions model in both regional emissions analyses and in hotspot analysis for new transportation conformity analyses outside of California. As part of the consultative partners conference call hosted by the EPMPO on June 22, 2021, per guidance from consultative partners, MOVES2014b was used to calculate emissions of vehicles.

MOVES2014b is the EPA-approved model for calculating aggregate motor vehicle emission factors (EF) for pollutants such as CO, direct PM<sub>10</sub>, oxides of nitrogen (NO<sub>x</sub>) and volatile organic compounds (VOCs), so that they can be compared: to the MVEB for VOC, NO<sub>x</sub> and PM<sub>10</sub>. The official release of MOVES2014b (latest release December 2018) was applied for this analysis based on past consultative partners conference calls to request guidance on the use of MOBILE-based MVEBs

with a MOVES-based regional emissions analysis for the transportation conformity determination as MOVES-based MVEBs do not currently exist in the SIP. For the purposes of this conformity determination, per guidance from the consultative partners on later conference calls and on the approval of the Pre-Analysis Consensus Plan on October 13<sup>th</sup>, 2021, it was recommended to use the previous PM<sub>10</sub>, VOC and NO<sub>x</sub> MOBILE-based MVEBs for the transportation conformity determination for the MTP/TIP conformity for VOC, NO<sub>x</sub> and PM<sub>10</sub> pollutants and perform the no-greater-than-baseline year interim emission test, requiring comparison of the 2017 baseline year to the forecast years 2022, 2032, 2040 and 2050 for VOC and NO<sub>x</sub> pollutants for the portion of Doña Ana County near Sunland Park, NM non-attainment area.

The AP-42 model is also used to calculate emission factors for re-suspended road dust. It was designed to calculate a daily (average seasonal day) emissions factor for each of the four basic road types (Freeway, Arterial, Collector and Local) and to apply these rates to the appropriate Vehicle Miles Traveled (VMT) estimates by TDM functional classification. The MOVES2014b program is executed using summer and winter temperature and conditions to simulate emissions for PM<sub>10</sub>, VOC and NO<sub>x</sub>.

## MODELING

TransCAD software was used to create the EPMPO's regional TDM. Inputs to the TDM include projected demographics for the analysis years to test the effects of proposed transportation projects (2022, 2032, 2040 and 2050). Roadway networks were prepared for these years showing the number of lanes and roadway types (functional class) that would be constructed according to current MTP and TIP project descriptions, as well as roadways that already exist; for the current RMS 2050 MTP network.



**TABLE 2: EL PASO CONFORMITY ANALYSIS SUMMARY (EMISSIONS EXPRESSED IN TONS PER DAY)**

| POLLUTANT         | BUDGET                    | 2022 <sup>1,2</sup> | 2032 <sup>1,2</sup> | 2040 <sup>1,2</sup> | 2050 <sup>1,2</sup> |
|-------------------|---------------------------|---------------------|---------------------|---------------------|---------------------|
| VOC <sup>1</sup>  | <b>36.23</b> <sup>4</sup> | 7.01                | 3.99                | 3.07                | 2.90                |
| NOx <sup>1</sup>  | <b>39.76</b> <sup>4</sup> | 13.02               | 6.95                | 5.93                | 6.10                |
| PM10 <sup>2</sup> | <b>12.05</b> <sup>3</sup> | 7.03/7.61           | 7.85/8.47           | 8.36/9.02           | 9.09/9.81           |

1) Ozone (VOC and NOx) emissions include summer figure. Using 2017 weather station data. Analysis year emissions were calculated using 2017 meteorological data due to insufficient SIP data.

2) PM10 emissions include summer/ winter figures. Using 2017 weather station data. Analysis year emissions were calculated using 2017 meteorological data due to insufficient SIP data.

3) Transportation Conformity: Motor Vehicle Emissions Budgets (MVEB) (Appendix A: El Paso PM-10).

4) Transportation Conformity: Motor Vehicle Emissions Budgets (MVEB) (Appendix A: El Paso Ozone).

**TABLE 3: SUNLAND PARK OZONE NONATTAINMENT AREA ANALYSIS SUMMARY <sup>1</sup> (EMISSIONS EXPRESSED IN TONS PER DAY)**

| YEAR               | POLLUTANT (TONS/DAY) |             |
|--------------------|----------------------|-------------|
|                    | VOC                  | NOx         |
| 2017 Baseline year | <b>0.05</b>          | <b>0.11</b> |
| 2022               | 0.05                 | 0.08        |
| 2032               | 0.02                 | 0.04        |
| 2040               | 0.02                 | 0.03        |
| 2050               | 0.02                 | 0.03        |

1) This conformity determination demonstrates that the total emissions calculated from the modeled roadway network for future years will be at levels below the baseline year (2017) as required for the interim emissions test no-greater-than baseline year. Table 3 provides the conformity results for the VOC and NOx no greater-than-baseline year emissions tests.



## SECTION 1.0 INTRODUCTION

### 1.1 MPO ORGANIZATION AND ROLE

In the El Paso Transportation Management Area (TMA), the City of El Paso is designated as the fiscal agent for the Metropolitan Planning Organization (MPO), established pursuant to Section 134 of Chapter 1 of Title 23 of the United States Code (23 USC). The TPB is the transportation policy setting authority for the EPMPO. The TPB meetings are the forum for cooperative decision making by elected officials of local governments for the EPMPO Study Area. The EPMPO Study Area consists of El Paso County, and the southern portions of Doña Ana and Otero Counties in New Mexico. Appendix B provides a map of the EPMPO Study Area Boundary.

The MPO coordinates regional multimodal transportation plans involving the study of present transportation patterns in relation to existing and projected regional development. The TPB and its subcommittees carry out this coordination function. The MPO is responsible for the preparation of the MTP, the TIP, Transportation Conformity Report (TCR), the Unified Planning Work Program (UPWP), the Congestion Management Process (CMP), and other documents as required by 23 USC §134; the Federal Clean Air Act and Federal Clean Air Act Amendments of 1990 (FCAA); and respective SIPs.

### 1.2 PURPOSE

The purpose of this conformity analysis is to determine if the RMS 2050 MTP and RMS 2023-2026 TIP are consistent with projected PM<sub>10</sub>, VOC and NOx (Ozone) emission requirements.

### 1.3 CONFORMITY CRITERIA

The FCAA requires transportation plans, programs, and projects in non-attainment and maintenance areas that receive approval and/or funding from the Federal Highway Administration (FHWA) or Federal Transit Administration (FTA), to demonstrate conformity. The main objective is to prevent future transportation development from causing new air quality violations, worsening existing violations, and/or delaying a region's attainment of the NAAQS.

The following is a summary of the key criteria used in this conformity determination:

- Use of interagency consultation (see Section 7.0)
- Incorporation of the latest planning assumptions in the planning documents and modeling
- Use of approved models and methodology
- Development of an MTP and TIP that conform to the MVEBs established in the SIP for the PM<sub>10</sub> non-attainment area and ozone non-attainment area.

### 1.4 DOCUMENT FORMAT

This conformity determination report follows the Model Conformity Documentation outline adopted by the Technical Working Group (TWG) for Mobile Source Emissions.

### 1.5 ELECTRONIC DATA SUBMITTAL

The MTP, TIP, conformity documents for all non-attainment areas within the EPMPO, attachments, and related technical documents are available on the EPMPO Web Site located at <http://www.elpasompo.org/> under the conformity section (click link and scroll down to "Conformity") and electronically on a compact disc (CD) from the

EPMPO. Please call (915) 212-0258 for a copy. The conformity determination is in Adobe (pdf) format.

## 1.6 PRE-ANALYSIS CONSENSUS TEMPLATE

The Pre-Analysis Consensus Template originates from the efforts of the TWG to develop a process for reaching early consensus on the parameters to be used for a conformity determination. A Pre-Analysis Consensus Plan was utilized for this conformity

determination. The development of the networks and the emissions modeling are a two-step process and therefore some of the information in the Pre-Analysis Consensus template populated initially could be modified. The Pre-Analysis Consensus plan received consensus on October 13<sup>th</sup>, 2021 with the understanding that this was the current state of knowledge at that time. The consultation partners agreed to move forward and include the analysis notes, containing the remaining details in the conformity document.





## SECTION 2.0 MTP AND TIP CONFORMITY TO THE SIP

### 2.1 OVERVIEW

### 2.2 SUBMITTAL FREQUENCY

The MPO, under rules that govern nonattainment metropolitan areas, must approve a long-range plan every four years and a short-range program every four years, with all plans passing an analysis for conformity determination. If amendments are proposed to the MTP or TIP that would affect air quality and estimated emissions, an additional analysis must be made. One year after the effective date of designation of a new non-attainment area, FHWA/FTA conformity determination for the MTP and TIP must be completed. The EPMPO is proposing a new long range plan (RMS 2050 MTP) and a new TIP (RMS 2023-2026 TIP). The TPB followed the procedure of hearing and considering all public comments starting from January 24<sup>th</sup> and ending March 9<sup>th</sup> before adopting the respective MTP and TIP.

### 2.3 TRANSPORTATION CONTROL MEASURES

There are no Transportation Control Measure (TCM) requirements identified in the PM<sub>10</sub> SIP.

### 2.4 REGIONALLY SIGNIFICANT CONTROL PROGRAMS

Regionally significant control programs are intended to mitigate air pollution and assist an area in attaining the NAAQS. A mix of programs are selected by the state and are based on which programs are needed to attain the NAAQS. The selected control programs are incorporated into the appropriate SIP. Section 2.4.1, below, is one

provision written in the SIP for the nonattainment pollutants dealing with transportation-related measures.

#### 2.4.1 INSPECTION AND MAINTENANCE PROGRAM

The El Paso County Inspection and Maintenance (I/M) program, originating in 1987, employed the Two-Speed Idle (TSI) and the on-board diagnostics (OBD) tests. All 1995 and older model year vehicles were required to pass the TSI test. The TSI test measures tailpipe exhaust emissions of Carbon Monoxide (CO), Carbon dioxide (CO<sub>2</sub>), and other hydrocarbons (HC) while the vehicle idles at both high and low speeds and then includes a gas cap integrity test. The EPA-approved OBD test is required for all 1996 model year and newer vehicles. The OBD is an emission test to check the vehicle's on-board computer that identifies problems with the vehicle's emission control components. Since January 1, 2020, the I/M program consists of only OBD testing.

Details of the I/M program and rules may be found in 30 Texas Administrative Code (TAC) Chapter 114 Subchapter C Division 1: Vehicle Inspection and Maintenance.

New Mexico is not required to have an I/M Program. The basic and enhanced I/M requirements only apply to urbanized areas with a 1990 population in excess of 200,000, depending on location.

#### 2.5 REGIONALLY SIGNIFICANT TRAVEL PROJECTS/PROGRAMS

The TDM used for conformity determination consists of existing roadways considered to be regionally significant in the base year (2017) and the regionally significant roadways expected to be in place for each of the intermediate and horizon years: 2022, 2032, 2040 and 2050, regardless of funding source.



The determination of regionally significant projects comes from the “Regionally Significant Project” definition found in 40 CFR Section 93.101. The definition is as follows:

*“Regionally significant project means a transportation project (other than an exempt project) that is on a facility which serves regional transportation needs (such as access to and from the area outside of the region, major activity centers in the region, major planned developments such as new retail malls, sports complexes, etc., or transportation terminals as well as most terminals themselves) and would normally be included in the modeling of a metropolitan area’s transportation network, including at a minimum all principal arterial highways and all fixed guideway transit facilities that offer an alternative to regional highway travel.”*

Included in the TDM are the roadways on which conformity is based and thus considered regionally significant. Roadways in the travel demand model are coded with functional class and capacity classifications.

Regionally significant transit projects are represented through the mode share model. The model includes route systems for transit, with changes in speed or other operating conditions affecting the projected ridership. The mode share model has an effect on roadways by removing any projected transit riders before automobile vehicle trips are calculated and assigned to roadways.

## **2.6 NON-FEDERAL PROJECTS/PROGRAMS**

The MTP contains population and land use assumptions that project urban growth to the year 2050 into areas that are now vacant or have rural-type development. It has been El Paso’s experience in the recent past that urban development involves

the transition of totally or primarily vacant land (mainly desert) into subdivisions, with all services being provided in conjunction with the subdivision development, including water, sewer, roadways, and other services such as schools and parks. This has been accomplished through the subdivision ordinances of the City of El Paso and surrounding communities, and the relationship that the cities have with large developers who are able to build large-scale, phased developments. Although this development pattern had previously occurred primarily within the larger cities and their extra-territorial jurisdictions, this pattern of development can now be observed within other municipalities surrounding the City of El Paso.

## **2.7 EXEMPT PROJECTS/PROGRAMS**

Certain types of projects are defined in 40 CFR §93.126 that are exempt from conformity determination requirements. These projects generally do not add capacity to the roadway network and do not increase the transit miles traveled; thus, they add no new emissions to the metropolitan area. The examples listed in 40 CFR §93.126 include:

### **SAFETY**

- Railroad/highway crossings
- Projects that correct/improve/eliminate a hazardous location or feature
- Safer non-Federal-aid system roads
- Shoulder improvements
- Projects that increase sight distance
- Highway Safety Improvement Program Implementation
- Traffic control devices and operating assistance other than signalization projects
- Railroad/highway crossing warning devices
- Guardrails, median barriers, crash cushions
- Pavement resurfacing and/or rehabilitation





- Pavement marking
- Emergency relief
- Fencing
- Skid treatments
- Safety roadside rest areas
- Adding medians
- Truck climbing lanes outside the urbanized area
- Lighting improvements
- Widening narrow pavements or reconstructing bridges
- Emergency truck pullovers

### MASS TRANSIT

- Operating assistance to transit agencies
- Purchase of support vehicles
- Rehabilitation of transit vehicles (In  $PM_{10}$  nonattainment or maintenance areas, such projects are exempt only if they are in compliance with control measures in the applicable implementation plan.)
- Purchase of office, shop, and operating equipment for existing facilities
- Purchase of operating equipment for vehicles
- Construction or renovation of power, signal, and communications systems
- Construction of small passenger shelters and information kiosks
- Reconstruction or renovation of transit buildings and structures
- Rehabilitation or reconstruction of track structures, track, and trackbed in existing right of way
- Purchase of new buses and rail cars to replace existing vehicles or for minor expansions of the fleet

- Construction of new bus or rail storage/maintenance facilities categorically excluded in 23 CFR Part 771

### AIR QUALITY

- Continuation of ride-sharing and van-pooling promotion activities at current levels
- Bicycle and pedestrian facilities.

### OTHER

- Specific activities which do not involve or lead directly to construction, such as:
  - Planning and technical studies
  - Grants for training and research programs
  - Planning activities conducted pursuant to Titles 23 and 49 U.S.C.
  - Federal-aid systems revisions
- Engineering to assess social, economic, and environmental effects of the proposed action or alternatives to that action
- Noise attenuation
- Emergency or hardship advance land acquisitions
- Acquisition of scenic easements
- Plantings, landscaping, etc.
- Sign removal
- Directional and informational signs
- Transportation enhancement activities (except rehabilitation and operation of historic transportation buildings, structures, or facilities)
- Repair of damage caused by natural disasters, civil unrest, or terrorist acts, except projects involving substantial functional, locational or capacity changes



## 2.8 FINANCIAL PLANNING FOR THE RMS 2050 MTP

The RMS 2050 MTP is a 28-year plan with approximately \$8B of multimodal projects and programs included in fiscal years (FY) 2022-2050. The EPMPO study areas stretches across the state line between Texas and New Mexico, including El Paso County in Texas, Southern Doña Ana County, and a portion of Otero County in New Mexico. Facilitating the movement of people and goods throughout the region over this period of time presents numerous challenges from a financial standpoint. Projects and programs in the Texas portion of the EPMPO study area are approximately \$7B. Transit projects come to approximately \$1B. New Mexico projects total approximately \$382M. See Appendix C, for the financial summary and project list, which demonstrates a thorough comparison of project revenues and associated project costs in the RMS 2050 MTP.

There is a mix of FHWA, FTA, state (Texas and New Mexico) and local revenues used to cover associated project costs in the RMS 2050 MTP. It should be noted that all federal funds herein have been calculated to include the required local match, usually 20% for Texas and 14.56% for New Mexico. The RMS 2050 MTP includes total project cost, comprised of Construction, Right-of-Way (ROW), and Preliminary Engineering (PE) costs. The first ten years of the RMS 2050, FY 2022-2031, are fiscally constrained by funding category, followed by fiscal constraint in FY 2032. Banding together multiple years was applied for financial constraint in the outer years of the plan from 2033-2040 and 2041-2050. The EPMPO coordinated with Texas Department of Transportation (TxDOT) and New Mexico Department of Transportation (NMDOT) to determine acceptable inflation rates for projects within in their respective states. This resulted in compounded inflation rates of 4% in Texas, and

1.5% in New Mexico.

The EPMPO administers three federal funding categories, Congestion Mitigation and Air Quality Program (CMAQ), Surface Transportation Block Grant Program (STBGP) in urbanized areas for metropolitan mobility projects and the Transportation Alternative Program (TAP), which incorporates safe routes to schools and the recreation trails program. Texas CMAQ and STP-MM funds were accounted for through the Texas 2022 Unified Transportation Program (UTP) for years 2022-2031 of the RMS 2050 MTP. The 2022 UTP trend grows the CMAQ and STP-MM programs at 1.0%. This growth is in line with the historical average, and the EPMPO continued this growth rate throughout the remaining years of the RMS 2050 MTP with total Texas CMAQ revenue of \$302M, and total STP-MM revenue of \$723M. New Mexico CMAQ and STP-Large Urban revenue expectations were coordinated with NMDOT, and at the direction of NMDOT there was no growth rate applied to these programs in the RMS 2050 MTP. The total New Mexico CMAQ revenue is \$52M and total STP-Large Urban revenue is \$29M. The total Texas TAP program is \$41M, and NMDOT provides available TAP funds as they become available for planning and programming purposes. Federal funding administered by the EPMPO in the RMS 2050 MTP is in line with historical trends and no reduction of these funds are expected in the future. The EPMPO is also the designated recipient for the FTA 5310 program to meet the transportation needs of elderly persons and persons with disabilities where public mass transportation services are otherwise unavailable, insufficient, or unequipped to handle their needs. FTA funding apportionments for FY 2020 and 2021 have been programmed in FY 2022 and 2023 and based on historical trends the EPMPO has estimated \$650,000 each year starting in FY 2024 for a total of \$18,927,303 in the RMS 2050 MTP.



From 2023-2025 approximately \$5M of CMAQ funds are programmed to be transferred from FHWA to FTA for Sun Metro to operate its Montana RTS projects. Sun Metro will continue to receive traditional FTA 5307 formula funds for programs such as capital maintenance, planning and ADA Paratransit for over \$570M, and for Transit Enhancement projects covered by FTA 5339 funds for nearly \$114M, which includes approximately \$60M for buses and bus facilities. The FTA 5307 and 5339 funds are expected to grow at a rate of 1% through 2050. This growth rate is expected to be different for 5307 funds to be used for Security Equipment and 5339 funds for Bus and Bus facilities expenses which are calculated with a 2.5% growth rate. One Sun Metro projects is programmed with the expectation of receiving FTA 5309 Very Small Starts funding. Historically, Sun Metro has received Very Small Starts funding when leveraged by local funding. Federal transit funding is programmed for the Streetcar Phase II in FY 2041 which assumes funding split between 50% Certificates of Obligation and 50% FTA 5309 Very Small Starts funding.

TxDOT's 2022 UTP was used to account for financial constraint of Texas highway projects and programs, within the RMS 2050 MTP from 2022-2031, through traditional federal revenues from Categories 1-12. Unless otherwise noted, most of these funding categories continue throughout the RMS 2050 MTP, but no additional growth rate (other than the inflation rate) beyond 2032 was applied. Some of these categories are not used for specific projects but are a demonstration of programs, such as Category 1- Preventative Maintenance and Rehabilitation, Category 6-Structure Replacement and Rehabilitation, and Category 8-Safety Projects. Local contributions (which is beyond required local match to federal funds) is captured under Category 3 for projects in the Texas portion of the EPMP study area. TxDOT

proposed additional revenues assumptions in the RMS 2050 MTP: \$138M bonding revenue for Borderland Expressway project in 2027 and 2029. \$180M of El Paso-District allocation of Rider 11B Border Funding between 2023-2031. \$911M of Category 2 (Transportation Management Area Corridors) from 2032-2050. \$900M of Clear Lanes Initiative Version 2 funds was distributed throughout the plan between 2028 and 2050. NMDOT proposed federal and state revenues at approximately \$266M through a combination of STP Large Urban, STPLE, STP-Flex, National Highway Performance Program (NHPP), National Highway Performance-Freight (NHPP-F) New Mexico State Funds and Border State Infrastructure (SBSI) funds.

On September 1, 2021 the Transportation Project Advisory Committee (TPAC) recommended the RMS 2050 MTP Project List to the Transportation Policy Board (TPB) for approval on September 17, 2021. The 45-day Public involvement/comment period for the RMS 2050 MTP, RMS 2023-2026 TIP and Transportation Conformity Report was conducted from January 24, 2022 to March 9, 2022. The TPB adopted the final documents on March 25, 2022.

## 2.9 FINANCIAL PLANNING FOR THE RMS 2023-2026 TIP

The RMS 2023-2026 TIP covers a program horizon of four fiscally constrained years. The RMS 2023-2026 TIP is consistent with the RMS 2050 MTP and contains regionally significant projects to be funded with federal and non-federal funds. Inclusion of a project in the RMS 2023-2026 TIP reflects a consensus of priority needs among residents living in the MPO study area, locally and state-elected officials, local transportation agency representatives, and representatives of TxDOT and NMDOT. The RMS 2023-2026 TIP is, in effect, a listing of transportation priority needs that will



be implemented that contain total estimated costs and implementation dates. The RMS 2023-2026 TIP may be amended as transportation needs and/or funding levels change.

The RMS 2023-2026 TIP is fiscally constrained for transit projects and highway projects in the New Mexico and Texas portion of the El Paso MPO study area. This area is comprised of El Paso County, southern Doña Ana County, NM, and a small portion of Otero County, NM. The majority of projects are in the highway section for Texas, but all federal, state and locally funded projects of regional significance in the El Paso MPO study area are included.

Traditional federal funding categories that flow through TxDOT into the TIP are based on revenue forecasts in TxDOT's associated Unified Transportation Program (UTP). The UTP reflects the projects and programs that may be delivered

from available forecasted funding in Texas over a 10-year period. Close coordination is ongoing with NMDOT on available funds to be used in New Mexico. Transit projects are funded with FTA funds, and local funds. Most of the transit funding is for Sun Metro projects, the mass transit provider in the region.

Meetings of the Transportation Project Advisory Committee (TPAC), which recommends projects for approval, and the TPB, which approves projects in the TIP were used as open forum for the MPO public involvement process. The required 30-day public involvement/comment period was met for the RMS 2023-2026 TIP. These meetings were advertised in local newspapers. At the time of the approval of the RMS 2050 MTP the corresponding RMS 2023-2026 TIP was also adopted by the TPB, on March 25, 2022.





## SECTION 3.0 VEHICLE ACTIVITY

Section 3.0 describes the basic TDM inputs and approach used to develop the modeled volumes that are a necessary part of the air quality conformity process. Two of the primary travel model inputs - networks (e.g., an electronic representation of the current and future transportation system made up of links and nodes) and demographics - are briefly described below.

### 3.1 DEMOGRAPHIC SPECIFICATION FOR THE RMS 2050 MTP

To develop the 2017 base year demographic estimates, as well as the 2022, 2032, 2040, and 2050 demographic forecasts for the RMS 2050 TDM, several reliable data sources were used.

Sources for formulation of the 2017 population, household, and employment control totals included both government sources and proprietary sources:

- 2017 U.S. Census Bureau Population Estimates;
- 2017 American Community Survey (ACS) 5-year data and 1-year data;
- 2017 Texas Demographic Center (TDC) Population Estimates;
- 2017 Geospatial & Population Studies, University of New Mexico (UNMGPS) Population Estimates;
- Woods & Poole Complete Economic and Demographic Data Source (CEDDS).
- 2012 and 2017 U.S. Census Bureau County Business Pattern (CBP) data;
- 2012 and 2017 U.S. Bureau of Labor Statistics (BLS) Quarterly Census of Employment and Wages (QCEW) data;

- 2012 and 2017 Bureau of Economic Analysis (BEA) county level employment data;
- Woods & Poole Complete Economic and Demographic Data Source (CEDDS);
- 2017 Annual Survey of Public Employment & Payroll (ASPEP);
- 2017 Integrated Postsecondary Education Data System (IPEDS) data; and
- 2017 Texas Education Agency (TEA) data;
- 2017 National Center for Education Statistics (NCES) data; and
- 2017 Longitudinal Employer-Household Dynamics (LEHD) Origin-Destination Employment Statistics (LODES) data.

Estimation of forecast year demographic control totals was based on recommendations from the TDC, and the allocation of such data by traffic analysis zone (TAZ) was established through a Delphi process.

The final socioeconomic data estimates were reviewed by TxDOT El Paso District and TxDOT TxDOT Transportation Planning & Programming (TxDOT TP&P). Revisions were made based on feedback from the review combined with additional follow up analysis. Further information on the development of the demographic data for the base and forecast years associated with each TAZ can be found in Appendix G – El Paso Travel Demand Model Demographic Development.

The final TAZ geography contains 869 TAZs, including 21 external stations and several border crossings.



**TABLE 4: SUMMARY OF DEMOGRAPHIC DATA FOR THE EPMPO AREA**

|                        | 2017    | 2022    | 2032    | 2040      | 2050      |
|------------------------|---------|---------|---------|-----------|-----------|
| <b>Population</b>      | 879,325 | 932,764 | 993,504 | 1,034,460 | 1,103,789 |
| <b>Employment</b>      | 263,910 | 295,215 | 358,197 | 411,079   | 478,657   |
| <b>Households (HH)</b> | 282,823 | 308,094 | 346,036 | 373,780   | 412,242   |

Source: EPMPO, 2022

**TABLE 5: SUMMARY OF DEMOGRAPHIC DATA FOR THE 2015 OZONE NAAQS NONATTAINMENT AREA**

|                        | 2017   | 2022   | 2032   | 2040   | 2050   |
|------------------------|--------|--------|--------|--------|--------|
| <b>Population</b>      | 13,041 | 13,804 | 14,533 | 15,010 | 16,070 |
| <b>Employment</b>      | 2,229  | 2,423  | 2,810  | 3,121  | 3,508  |
| <b>Households (HH)</b> | 3,338  | 3,624  | 3,991  | 4,326  | 4,799  |

Source: EPMPO, 2018/TAZs: 781,783,782,780,779,778 & 775

### 3.2 TRAVEL DEMAND MODEL

For the development of the 2050 RMS Travel Demand Model, the EPMPO sought a vendor to develop a model interface along with the validation of the 2017 base year (refer to Appendix J) and development of the forecast years. The model factors, Highway Performance Monitoring System (HPMS), and the seasonal adjustment utilized for this conformity determination, are indicated in **Table 6**. This section provides a brief description of the RMS TDM. For the purpose of this conformity analysis TTI analyzed 2017,2022,2032,2040 and 2050, with 2017 as the baseline year for ozone interim no-greater-than-baseline year test.



**TABLE 6: TRAVEL MODEL DEMAND FACTORS**

| MODEL FACTOR        | DETAIL  |
|---------------------|---|
| HPMS <sup>1</sup>   | 1.037120  |
| Seasonal Adjustment | <p><u>For all analysis years, ANSWT conversion factors to seasonal weekday, based on latest available TxDOT 2010 through 2019 El Paso County ATR data:</u></p> <p><u>Summer (June through August) weekday (M-F):</u><br/>           -- 0.95702</p> <p><u>Winter (Dec., Jan., &amp; Feb.) weekday:</u><br/>           -- 0.99892</p> |

1) The HPMS Factor is calculated using TDM VMT excluding New Mexico VMT.

### 3.2.1 TRAVEL MODEL DESCRIPTION

The study area for the RMS Model includes El Paso County in Texas and the southern portions of Doña Ana and Otero counties in New Mexico. The model base year is 2017, the model forecast years include 2022, 2032, 2040, and 2050, and the baseline year for the conformity analysis on the ozone nonattainment areas required for the [baseline year test \(in 40 CFR 93.119 \(e\) \(4\)\)](#) is 2017. The RMS Model uses a multiyear master line layer from which individual analysis year networks are derived for use in the analysis of travel demand in the El Paso MPO area.

The RMS Model interface is a combination of TxDOT trip generation and standalone set of macros that run within the TransCAD travel demand modeling software platform.

The RMS Model is a trip-based model, typical of most state of the practice models, which is validated to daily traffic flows. The traffic flows are produced through a typical four step process that includes – trip generation, trip distribution, and mode share and traffic assignment, with a speed feedback loop. These procedures are built in a TxDOT TP&P uniquely developed software,

commonly referred to as the “Texas Package”.

Within the Texas Package, the Trip Generation Program (TripCAL6) is used to generate person trip ends for the El Paso travel demand model. The RMS TDM uses TransCAD’s Gravity Model to distribute the productions and attractions calculated by the trip generation program. The RMS TDM includes as well a Logit-based mode choice procedure which converts person-trips into vehicle-trips (drive alone, share ride 2 and 3+), as well as transit, pedestrian, and bicycle trips. All of these trips are provided for four time-of-day periods: AM Peak, PM Peak, mid-day and night-time.

Finally, the RMS TDM uses the TransCAD User Equilibrium (UE) Assignment for vehicle trips. The assignment procedure in the RMS TDM includes toll road modeling capabilities as well.

The Border West Expressway is currently the only roadway facility in our region with all the needed tolling infrastructure, but as of today such infrastructure has not been activated. The facility has been operating without charging tolls for a couple of years and there is no official date for the tolling to be activated. Therefore, the TDM represented the facility as non-tolled.



## SECTION 4.0 EMISSION FACTORS/MOVES MODEL

### 4.1 OVERVIEW

The TDM has a validated 2017 base year, and forecast network years of 2022, 2032, 2040, and 2050 (Appendix I- Emissions Analysis Notes include the network years). The forecast years incorporate projects proposed in the MTP and TIP. The model outputs were then sent to TTI for emissions analysis.

#### 4.1.1 ASSUMPTIONS

This document summarizes the MOVES2014b inputs and other inventory elements TTI used for developing the 2017, 2022, 2032, 2040, and 2050 on-road mobile source emissions inventories for the conformity analysis.

#### 4.1.2 METHODOLOGY

TTI produced summer season weekday VOC and NO<sub>x</sub> emissions (2017 and forecast years) and both summer and winter weekday PM<sub>10</sub> (forecast years) emissions estimates for evaluation years. The procedure and data applied to develop the emissions estimates follows the same general methodology (i.e., hourly, TDM link-based) as applied in the most recent El Paso MTP conformity analysis. However, the procedure applied the latest planning assumptions to include data that are more recently available (e.g., new traffic assignments, latest available registrations data for development of vehicle fleet characteristics, MOVES2014b model, as allowed by the timeframe of this analysis).

#### 4.1.3 DATA SOURCES AND DEVELOPMENT

The EPMPD provided the requisite 24-hour travel model traffic assignments and intrazonal trips. TTI provided the various seasonal weekday VMT adjustment factors (for total VMT and for hourly VMT distributions) based on the latest multi-year TxDOT El Paso Automatic Traffic Recorder (ATR) data, and the HPMS consistency factor (from travel model validation year). TTI also provided travel model traffic assignments and intrazonal trips by time period (AM Peak, Midday, PM Peak, and Overnight), as well as VMT mix by roadway functional classification group for the 24-hour period, based on recent multi-year classification counts.

The MOVES2014b speed-sensitive Freeway and Arterial drive cycle emissions factors were applied to the freeway and non-freeway (excluding ramps) functional classifications. Ramp drive-cycle emissions factors were modeled using arterial (unrestricted access) drive-cycle emission rates (because MOVES2014b does not provide ramp specific emission factors).

TTI provided emissions estimates for 13 vehicle types in the typical summary form of hourly totals by county and road type as well as 24-hour totals. The MOVES2014b commands/inputs are located in Appendix I.

### 4.2 MOVES2014B INPUTS

TTI developed the MOVES2014b model inputs according to guidance provided in *MOVES2014, MOVES2014a, and MOVES2014b Technical Guidance: Using MOVES to Prepare Emission Inventories for State Implementation Plans and Transportation Conformity* (EPA, August 2018) and *MOVES2014 User Interface Reference Manual Appendix:MOVES2014b* (EPA, August 2018). Please see Appendix I for more detailed





information on the MOVES Inputs.

#### 4.2.1 SUMMARY OF CONTROL PROGRAMS MODELED

This section summarizes the MOVES2014b commands and data parameter values used in MOVES2014b to model the El Paso I/M Program and Anti-Tampering Program (ATP), CO season Oxygenated Fuel Program and the Fuel Reid Vapor Pressure (RVP) Gasoline Program.

#### 4.2.2 I/M PROGRAM

The El Paso I/M program consists of exhaust (start year 1987) and evaporative (start year 1997) component tests conducted on an annual basis. As of January 1, 2007, 1996 and newer I/M-subject vehicles equipped with OBD systems are tested under OBD and gas cap (GC) integrity tests, while pre-1996 and non-OBD equipped vehicles are tested under the TSI and GC tests. But since January 1, 2020, the I/M program consists of only OBD testing.

#### 4.2.3 ANTI-TAMPERING PROGRAM (ATP)

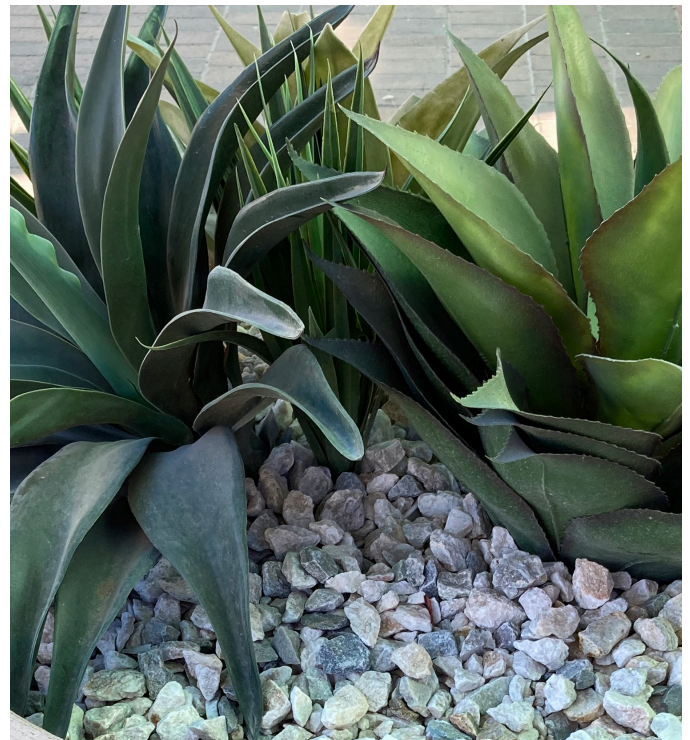
The ATP is a statewide, annual vehicle inspection program that is included in the emissions factor modeling for areas that also administer an I/M program. The ATP became effective in El Paso in 1983. The ATP requires any person owning, operating, and/or selling a motor vehicle to ensure the systems or devices used to control emissions are in good and operable condition. The program requires the use of the equipment at all times, thus prohibiting the operator or vendor from tampering with the emissions control system of the vehicle. The program is administered by the Department of Public Safety (DPS). This program applies to the gasoline-fueled vehicle class within a two through twenty-four-year vehicle age.

#### 4.2.4 OXYGENATED FUEL, FUEL REID VAPOR PRESSURE, AND DIESEL SULFUR CONTENT

The El Paso Oxygenated Fuels Program, which began on October 1, 1992, requires that all gasoline in the area have a minimum oxygen content of 2.7 percent oxygen by weight from October 1 to March 31 of the next year in order to control CO emissions. Please see Appendix I for more detailed information on the Oxygenated Fuel, Reid Vapor Pressure, and Diesel Sulfur Content.

#### 4.2.5 TEMPERATURES BY TIME PERIOD

The ambient temperature input values (shown in **Table 7** below) consist of the seasonal daily average hourly temperatures. These values were input to MOVES2014b by season. **Table 7** includes the 2017 meteorological data used for PM<sub>10</sub> and Ozone (VOC and NO<sub>x</sub>) inventories.





**TABLE 7: METEOROLOGICAL INPUTS TO MOVES: TEMPERATURE (T) - FAHRENHEIT, RELATIVE HUMIDITY (RH) – PERCENT. (2017 METEOROLOGICAL DATA USED FOR PM AND OZONE INVENTORIES) <sup>1</sup>**

| HOUR       | SUMMER |       | WINTER |       |
|------------|--------|-------|--------|-------|
|            | T      | RH    | T      | RH    |
| 12:00 a.m. | 79.77  | 42.73 | 48.57  | 45.01 |
| 1:00 a.m.  | 78.51  | 45.05 | 47.44  | 46.81 |
| 2:00 a.m.  | 77.31  | 47.11 | 46.44  | 48.65 |
| 3:00 a.m.  | 76.27  | 49.05 | 45.46  | 50.32 |
| 4:00 a.m.  | 75.38  | 50.63 | 44.62  | 51.63 |
| 5:00 a.m.  | 74.47  | 52.45 | 43.71  | 53.29 |
| 6:00 a.m.  | 73.96  | 53.51 | 43.08  | 54.26 |
| 7:00 a.m.  | 75.19  | 51.26 | 43.39  | 52.85 |
| 8:00 a.m.  | 77.54  | 46.95 | 45.76  | 48.11 |
| 9:00 a.m.  | 80.13  | 42.42 | 48.91  | 43.16 |
| 10:00 a.m. | 82.81  | 37.98 | 52.31  | 38.25 |
| 11:00 a.m. | 85.38  | 33.88 | 55.29  | 34.22 |
| 12:00 p.m. | 87.54  | 30.66 | 57.39  | 31.80 |
| 1:00 p.m.  | 89.27  | 28.03 | 59.07  | 29.61 |
| 2:00 p.m.  | 90.68  | 25.90 | 60.29  | 27.94 |
| 3:00 p.m.  | 91.85  | 24.01 | 60.83  | 27.40 |
| 4:00 p.m.  | 92.09  | 24.18 | 60.37  | 28.06 |
| 5:00 p.m.  | 91.62  | 24.77 | 58.77  | 30.20 |
| 6:00 p.m.  | 90.74  | 25.75 | 56.88  | 32.70 |
| 7:00 p.m.  | 89.02  | 28.24 | 55.16  | 35.17 |
| 8:00 p.m.  | 86.68  | 32.05 | 53.66  | 37.07 |
| 9:00 p.m.  | 84.78  | 34.61 | 52.16  | 39.26 |
| 10:00 p.m. | 82.97  | 37.00 | 50.77  | 41.34 |
| 11:00 p.m. | 81.28  | 40.04 | 49.58  | 42.97 |

1) Average hourly from weather stations within El Paso County—June through August 2017 for summer and January, February, and December for winter (provided by TCEQ). Temperatures in °F and percent for relative humidity.



#### **4.2.6 VEHICLE REGISTRATION DISTRIBUTIONS AND DIESEL FRACTIONS**

Vehicle registration (age) distributions and diesel fractions inputs to MOVES2014b were developed using the latest available Texas Department of Motor Vehicles (TxDMV) analysis year-specific mid-year county vehicle registration data. Since no 2017 registration data is available for use with the 2017 baseline, the latest available TxDMV data (year-end 2018) will be used for the 2017 baseline as well as the future analysis years. The latest available data (2018) was used for the future analysis years; 2022, 2032, 2040, and 2050. The vehicle age distribution input data set are county level, except for the heavy-duty vehicle (HDV) class 8b category, which is state level. The diesel fractions input data sets (one for each evaluation year) are state level. MOVES2014b defaults were used where the required information was not available in the TxDMV data. The application of local registration distributions and diesel fractions follows guidance in [MOVES2014](#), [MOVES2014a](#), and [MOVES2014b Technical Guidance: Using MOVES to Prepare Emission Inventories for State Implementation Plans and Transportation Conformity](#) (EPA, August 2018). Please see Appendix I for more detailed information on the vehicle age distributions and diesel fractions.

#### **4.2.7 VEHICLE REGISTRATION DISTRIBUTIONS**

The user-supplied vehicle registration distributions input to MOVES2014b are by vehicle age for any of the 13 composite (combined gasoline and diesel) vehicle types. MOVES2014b internal default distributions are applied for vehicle classes for which the analyst does not provide alternate values. The input values for each vehicle class are 30 age fractions representing the fraction of vehicles by age for that particular vehicle class as of July of the evaluation year. These age fractions

start with the evaluation year as the 1<sup>st</sup> age fraction and work back in annual increments to end with the 30<sup>th</sup> fraction, which represents the fraction of vehicles of age 30 years and older. The fractions are calculated as the model-year-specific registrations in a class divided by the total vehicles registered in that class.

#### **4.2.8 DIESEL FRACTIONS**

MOVES2014b allows the modeler to specify diesel fractions for 13 composite (gasoline and diesel) vehicle categories by vehicle age. MOVES2014b assumes that urban/transit buses are 100 percent diesel, motorcycles are 100% gasoline, and combination long haul trucks are 100% diesel, so these categories do not require diesel fractions. The diesel fraction represents the portion of diesel vehicles in a composite (gasoline and diesel) vehicle class for any vehicle age. When the modeler enters diesel fractions, all 13 sets of fractions are required. Each set of fractions contains the diesel fractions estimates for 30 vehicle ages from the evaluation year back through the 30<sup>th</sup> fraction, which represents vehicle ages of 30 years and older. The model year that MOVES2014b applies to each age-specific diesel fraction value depends on the calendar year of evaluation, thus the modeler must provide separate input for each evaluation year to be modeled.

#### **4.2.9 VMT MIX**

Using latest available vehicle classification counts (2009-2018) and associated year-end registration data (2018), TTI estimated the El Paso County time-of-day (AM Peak, Mid-Day, PM Peak, Overnight) VMT mixes by the four MOVES road types. No seasonal adjustments are made for VMT mix. The methodology is described in “*Developing MOVES Source Use Types and VMT Mix for Conformity Analysis*” (TTI, August 2016) Appendix I).

MOVES uses a different vehicle classification scheme than the FHWA categories. MOVES



categorized the fleet based on nine different fuel types and 13 different source use types (SUTs). VMT mix is an estimate of the fraction of on-road fleet VMT attributable to each SUT by fuel type, and is used to subdivide the total VMT estimates on each link into VMT by vehicle type. Hourly estimates by vehicle type are combined with the appropriate emissions factors in the link-emissions process. TTI originally developed a method for converting vehicle classification count data collected in the Federal Highway Administration (FHWA) vehicle classification categories (based on axle spacing and/or vehicle length) into the eight Mobile Source Emission Factor Model (MOBILE5) categories. This methodology was subsequently modified and expanded to include the 28 vehicle classification types contained in MOBILE6. An analogous approach to adapting these data for use with MOVES was developed in concept by TTI and implemented shortly thereafter. Please see Appendix I for more detailed information on the VMT Mix.

#### 4.2.10 TRANSVMT INPUTS

The utility post-processing TDM (TRANSVMT) produce hourly, seasonal and day-of-week specific, on-road vehicle, directional link VMT and speed estimates. The TRANSVMT utility processes a TDM traffic assignment by multiplying the link volumes by the appropriate HPMS, seasonal, or other VMT factors. Hourly factors are then used to distribute

the link VMT to each hour in the day.

A speed model involving both the link estimated free flow speed and estimated directional delay (as a function of volume and capacity) is used to estimate the operational time-of-day link speeds for each direction.

Since intrazonal links are not included in the TDM, special intrazonal links are created and the VMT and speeds for these special links are estimated using the intrazonal trips from the trip matrix and the zonal radii. The link VMT and speeds produced by TRANSVMT are subsequently input to the emissions calculation utility, Emissions Calculation Program (EmsCalc), for applying the MOVES-based emissions factors.

#### 4.2.11 TIME-OF-DAY FACTORS

TTI used the multi-year TxDOT El Paso ATR data to develop one set of average weekday VMT factors for each seasonal period for all analysis years. These factors were applied to allocate the time period TDM assignment-based VMT by hour-of-day to determine emissions. Please see Appendix I for more detailed information on the time-of-day factors.

#### 4.2.12 AREA TYPE SPECIFICATIONS

The EPMPO planning area is divided into five area types designated by a code or label and defined as shown in **Table 8**.

**TABLE 8: THE METROPOLITAN PLANNING AREA TYPES**

| LABEL |                   |
|-------|-------------------|
| 1     | Business District |
| 2     | Urban Intense     |
| 3     | Urban Central     |
| 4     | Suburban          |
| 5     | Rural             |



### 4.2.13 TIME-OF-DAY DIRECTIONAL SPLIT FACTORS

The 24-hour link assignment volumes, adjusted for season and HPMS consistency and allocated by time-of-day, are non-directional volumes (i.e., the sum of the volumes in the two directions on a link). Directional splits were applied to estimate the portion of the travel that occurred in each direction. These directional volume estimates were used to estimate the directional speeds. Application of the directional split factors resulted in two link records for each network link: one record containing the estimated VMT and speed in the peak (or dominant) direction, and the second record containing the estimated VMT and speed in the opposite direction. This allowed the application of MOVES emissions factors directionally by speed. Please see Appendix I for more detailed information on the time-of day directional split factors.

### 4.2.14 TIME-OF-DAY CAPACITY FACTORS

Time-of-day (i.e., hourly) capacity factors were applied to non-directional capacity (or service volume) for each hour. In computing the directional volume/capacity (v/c) ratio for estimating the directional speeds, the directional split for capacity

is assumed to be 50-50. Please see Appendix I for more detailed information on the time-of-day capacity factors.

### 4.2.15 FREE FLOW SPEED FACTORS

The estimated free flow speed is used in conjunction with the estimated directional delay (in minutes/mile) to compute the directional congested speed. Unless free flow speeds are included in the TDM, free flow speed factors are used to convert TDM speeds (which are by definition level of Service (LOS) C to LOS A speeds (free flow)). Details of this procedure are provided in the discussion of the speed model in Section 4.2.16. Please see Appendix I for more detailed information on the free flow speed factors.

### 4.2.16 SPEED MODEL FORMULATION

The TDM speed model uses hourly volume and capacity to estimate delay. The link volume was also allocated by hour and direction using the VMT factors (HPMS and seasonal adjustments), hourly factors, and directional split factors. The development of hourly volume and capacity by direction is discussed previously in this document. The directional delay (in minutes per mile) due to congestion was calculated using the following volume/delay equation:

$$Delay = Min \left[ A e^{B \left( \frac{V}{C} \right)}, M \right]$$

Where:

- Delay = congestion delay (in minutes/mile);
- A & B = volume/delay equation coefficients;
- M = maximum minutes of delay per mile; and
- V/C = time-of-day directional V/C ratio.



The delay model parameters (A, B, and M) were developed for the Dallas/Fort Worth area and verified by application in other Texas urban areas. **Table 9** shows these parameters.

**TABLE 9: VOLUME/DELAY EQUATION PARAMETERS**

| FACILITY CATEGORY        | A     | B   | M    |
|--------------------------|-------|-----|------|
| High-Capacity Facilities | 0.015 | 3.5 | 5.0  |
| Low-Capacity Facilities  | 0.050 | 3.0 | 10.0 |

Given the estimated directional delay (in minutes/mile) and the estimated free flow speed, the directional congested speed is computed as follows:

$$\text{Congested speed} = \frac{60}{\frac{60}{\text{Freeflow speed}} + \text{Delay}}$$

This model was applied at the link level by area type and functional class combination for each time period and each direction. Directional, hourly operational link speeds were estimated using the speed model, which estimates delay on each link as a function of volume-to-capacity, and applies it to the link's estimated free-flow speed. Local streets category link average operational speeds were estimated, represented by the centroid connector and added intrazonal links, as centroid connector TDM input speeds and the zone's average centroid connector input speed, respectively. Please see Appendix I for more detailed information on the speed model.

### 4.3 POST PROCESSED ADJUSTMENTS

No emissions rate adjustments were required and therefore no emissions rate adjustments via post-processing were performed.



## SECTION 5.0 MOBILE SOURCE EMISSION REDUCTION STRATEGIES (MOSERS)

### 5.1 TRANSPORTATION CONTROL MEASURES

As defined by the EPA in the Transportation Conformity Regulations, a TCM “is any measure that is specifically identified and committed to in the applicable implementation plan, including a substitute or additional TCM that is incorporated into the applicable SIPs through the process established in FCAA section 176(c)(8), that is either one of the types listed in FCAA section 108, or any other measure for the purpose of reducing emissions or concentrations of air pollutants from transportation sources by reducing vehicle use or changing traffic flow or congestion conditions. Notwithstanding the first sentence of this definition, vehicle technology-based, fuel-based, and maintenance-based measures which control the emissions from vehicles under fixed traffic conditions are not TCMs for the purposes of this subpart.”

The approved El Paso and Anthony, NM, PM10 SIP, does not contain any TCMs.

The Sunland Park baseline emissions inventory and emissions statement SIP Revision and Certification was submitted to EPA September 10, 2020 and approved October 15, 2021 (86 FR 57388). NMED’s nonattainment new source review (NNSR) permitting requirements (20.2.79 NMAC; Permit-Nonattainment Areas) SIP Revision was amended by the Environmental Improvement Board on June 25, 2021 and submitted to EPA July 30, 2021 for approval in meeting the 2015 O3

NAAQS. Please note that adoption of Reasonably Available Control Technologies (RACT) as indicated below is not required for marginal ozone nonattainment areas and NMED has not included these in our SIP Revisions.”

No applicable SIP or TCMs exist.

### 5.2 VMEP

Under the El Paso Metropolitan Area no applicable SIP and/or Voluntary Mobile Emissions Reduction Programs (VMEP) exist.

### 5.3 TRANSPORTATION EMISSION REDUCTION MEASURES (TERM)

For this Transportation conformity determination, no TERMs are being utilized.

### 5.4 CMAQ

Part of the strategy to reduce emissions has been to use CMAQ funds leveraged with local and other federal funds to develop projects that positively affect air quality. The El Paso Metropolitan Area has made use of these funds since their inception in the Intermodal Surface Transportation Efficiency Act of 1991.

Before any project is approved and funded an evaluation is made of the costs and air quality benefits resulting from project implementation.

The TPAC of the MPO is charged with comparing the results of these evaluations and making recommendations to the TPB for allocation of CMAQ funding in each fiscal year of the TIP.

The MPO Project List includes CMAQ projects that will be funded through the RMS 2023-2026 TIP (see Appendix C).

## SECTION 6.0

# DETERMINATION OF REGIONAL TRANSPORTATION EMISSIONS

This section describes the modeling procedures used to determine conformity for the RMS 2050 MTP and RMS 2023-2026 TIP. It describes the TDM, mobile source emission estimation methodology, and AP-42 Model, Section 13.2.1.

### 6.1 PROCEDURE

#### 6.1.1 MOBILE SOURCE EMISSIONS ESTIMATE

##### 6.1.1.1 MOVES

The EPA highway vehicle emissions factor model provides average in-use fleet emissions factors for a variety of pollutants. For this case, the model was used to produce emissions factors for three pollutants: NO<sub>x</sub>, VOC and PM<sub>10</sub> (direct vehicle PM<sub>10</sub> emissions, excluding re-suspended dust from paved roads, which is discussed later in this document). MOVES2014b is the EPA-approved model. MOVES was initially released in December 2009 to replace the MOBILE model series. Previously MOBILE6.2.03 was used to generate highway mobile source emissions inventories, motor vehicle emissions budgets, and control strategies for SIPs under the FCAA, as well as for developing environmental impact statements under the National Environmental Policy Act (NEPA).

MOVES2014b is a model that estimates volatile organic compounds (VOCs), nitrogen oxides (NO<sub>x</sub>), PM<sub>2.5</sub> and PM<sub>10</sub>, carbon monoxide (CO), and other precursors from cars, trucks, buses,

and motorcycles for SIP purposes and conformity determinations outside of California (California uses Emissions Factor Model (EMFAC)). The internal calculation procedures used in MOVES2014b are provided in various technical reports posted on EPA's MOVES Internet page located at <https://www.epa.gov/moves/moves-technical-reports>

MOVES categorizes vehicles into 13 source types and have 6 fuel types (gasoline, ethanol (E-85), diesel, compressed natural gas (CNG), electricity, and liquefied petroleum gas (LPG)). MOVES calculates emissions based on VMT by vehicle type, the number of each type of vehicle in the fleet, vehicle age distribution, fuel information, meteorological data, et cetera. The user can specify many of the variables affecting vehicle emissions. Five different road types are considered in MOVES as well as a 31-year range for vehicle ages.

**Table 10** shows the 13 source types, which are subsets of five HPMS vehicle types.







**TABLE 10: MOVES SOURCE TYPES AND HPMS VEHICLE TYPES**

| SOURCE TYPE ID | SOURCE TYPES                 | HPMS VEHICLE TYPE ID | HPMS VEHICLE TYPE                                  |
|----------------|------------------------------|----------------------|--|
| 11             | Motorcycle                   | 10                   | Motorcycles  |
| 21             | Passenger Car                | 25                   | Light Duty Vehicles (LDV)-Short and Long Wheelbase |
| 31             | Passenger Truck              |                      |  |
| 32             | Light Commercial Truck       |                      |  |
| 41             | Intercity Bus                | 40                   | Buses  |
| 42             | Transit Bus                  |                      |  |
| 43             | School Bus                   |                      |  |
| 51             | Refuse Truck                 | 50                   | Single Unit Trucks                                 |
| 52             | Single Unit Short-haul Truck |                      |  |
| 53             | Single Unit Long-haul Truck  |                      |  |
| 54             | Motor Home                   |                      |  |
| 61             | Combination Short-haul Truck | 60                   | Combination Trucks                                 |
| 62             | Combination Long-haul Truck  |                      |  |

Table 11 shows the five different road types and their description.

**TABLE 11: ROAD TYPES**

| ROAD TYPE                     | DESCRIPTION  |
|-------------------------------|--|
| Off-Network (roadtype 1)      | all locations where the predominant activity is vehicle starts, parking and idling (parking lots, truck stops, rest areas, freight or bus terminals) |
| Rural Restricted Access (2)   | rural highways that can only be accessed by an on-ramp   |
| Rural Unrestricted Access (3) | all other rural roads (arterials, connectors, and local streets)   |
| Urban Restricted Access (4)   | urban highways that can only be accessed by an on-ramp   |
| Urban Unrestricted Access (5) | all other urban roads (arterials, connectors, and local streets)   |



## **6.1.2 TTI EMISSIONS ESTIMATION UTILITIES**

The following is a summary of the series of tools developed by TTI for developing link-based, time-of-day, on-road mobile source emissions estimates for air quality analyses. These utilities produce emissions factors with the latest MOVES emissions factor model, and apply them to travel model-based activity estimates to calculate emissions at user-specified temporal and spatial scales. The location of emissions by grid, or travel network link coordinates, may also be specified. The emissions estimation tools are: RatesCalc, EmsCalc, TRANSVMT, VMTmixBuild, OffNetActCalc, VehpopulationBuild and MOVESfleetInputBuild. RatesCalc – produces and/or compiles emissions rate tables from MOVES output; EmsCalc – calculates hourly link emissions for a county (or coded sub-county area) using the estimated link VMT and speeds, VMT mixes, off-network activity, and emissions factors from MOVES, RatesCalc, or RatesAdj; TRANSVMT - estimates the on-road fleet VMT and operational speeds for use in air quality analyses (input to EmsCalc), based on TDM data sets; VMTmixBuild – formats gasoline and diesel MOVES source type (vehicle type) VMT mix input to EmsCalc; OffNetActCalc – calculates source-hours-parked (SHP), Source-hours-extended-idling (SHI), Auxiliary Power Unit (APU) hours, and starts inputs to EmsCalc; VehpopulationBuild – calculates vehicle population estimates input to OffNetActCalc based on vehicle registration data and other factors; and MOVESfleetInputBuild – produces sourcetypeagedistribution and avft (i.e., fuel fractions) table inputs to MOVES, based on vehicle registration data, MOVES default data, and VMT mix estimates (See Appendix I).

## **6.2 CALCULATED EMISSIONS**

### **6.2.1 CALCULATED LINK-BASED EMISSIONS**

The main components of the emissions estimates (link VMT, VMT mix, and emissions factors) were combined according to the procedures described to produce the resulting emissions estimates.

The resulting emissions estimates are summarized in Tables 12, 13 and 14. Additional detail in the form of hourly and 24-hour emissions by functional classification and vehicle type are available electronically (Appendix I).

### **6.2.2 CALCULATED EMISSIONS FOR DONUT AREAS**

Emissions for donut areas are not applicable for this analysis since the nonattainment area is not outside the metropolitan planning area boundary and is not a donut area (reference: 40 CFR 93.101 Definitions).

## **6.3 EMISSIONS ESTIMATIONS UTILITIES**

### **6.3.1 TRANSVMT**

The TRANSVMT utility post-processes travel demand models outputs to produce hourly, on-road vehicle, seasonal and day-of-week specific, directional link VMT, and speed estimates. The TRANSVMT utility processes a TDM traffic assignment by multiplying the link volumes by the appropriate HPMS, seasonal, or other VMT factors. Hourly factors are then used to distribute the link VMT to each hour in the day. The TTI speed model is used to estimate the operational time-of-day link speeds for each direction. Since intrazonal links are not included in the TDM, special intrazonal links are created and the VMT and speeds for these special links are estimated using the intrazonal trips from the trip matrix and the zonal radii. The



link VMT and speeds produced by TRANSVMT are subsequently input to the EmsCalc utility for applying the MOVES-based emissions factors (as well as with other utilities to develop off-network activity estimates).

### **6.3.2 VEHPOPULATIONBUILD**

The VehPopulationBuild utility builds the sourcetypeyear data files in a format consistent with the MOVES input database table and the SUT/fuel type population input file (can be used with the EmsCalc utility to estimate emissions or the OffNetActCalc utility to estimate starts and SHP) using the VMT mix and the TxDMV registration data sets. The TxDMV registration data sets are three sets of registration data (an age registration data file, a gas trucks registration data file, and a diesel trucks registration data file) that list 31 years of registration data.

### **6.3.3 OFFNETACTCALC**

The OffNetActCalc calculates the analysis scenario (i.e., year, season, day type) SHP, SHI, starts, and APU hours by hour, SUT, and fuel type used to estimate emissions using the EmsCalc utility. The starts activity is calculated using the SUT/fuel type population and the starts per vehicle (typically the MOVES default). The SHI and APU hours are a function of hotelling hours (hours spent by drivers of long-haul trucks with their trucks parked during mandatory rest periods). This utility has two options for calculating the hotelling hours. Using the first option, the analysis scenario 24-hour hotelling hours is calculated using a user-supplied extended idle factor applied to the source hours operating (SHO) data. The second option (and suggested method) uses base data (24-hour hotelling, link VMT and speeds, and VMT mix), the analysis scenario data used to calculate the SHP, and the analysis scenario SHP to calculate the analysis scenario 24-hour hotelling hours.

### **6.3.4 MOVESACTIVITYINPUTBUILD**

The MOVESactivityInputBuild utility builds the roadtypedistribution, hourvmtfraction, avgspeeddistribution, roadtype, hpmstypeday, sourcetypeofdayvmt, year, state, zone, zoneroadtype, monthvmtfraction, and dayvmtfraction data files in a format consistent with the MOVES input database tables using the link-based hourly VMT and speeds developed with the TRANSVMT or VirtualLinkVMT utility, the VMT mix, and the MOVES defaults. The utility also has the option of building the sourcetypeage (adjusted to reflect the 24-hour VMT mix), starts, and hotelling hours data files in a format consistent with the MOVES input database tables using the output from the OffNetActCalc utility, along with inputs from the MOVES runs and the MOVES defaults.

### **6.3.5 MOVESFLEETINPUTBUILD**

The MOVESfleetInputBuild utility builds the sourcetypeagedistribution database table and fuel/engine fraction inputs to MOVES using the TxDOT registration data sets and the MOVES default database tables.

### **6.3.6 RATESCALC**

The RatesCalc utility calculates emissions rates in terms of rate/SHP for the evaporative emissions processes using the data in the County Data Base (CDB) used in the MOVES emissions rates run and the MOVES default database.

### **6.3.7 RATESADJ**

The RatesAdj utility applies emissions rate adjustments to an emissions rate database table produced by RatesCalc utility (ttirateperdistance, ttirateperstart, ttirateperhour, or ttiratepershp) or by this utility to produce a new emissions rate database table in the same format as the input emissions rate database table.



### 6.3.8 EMSCALC

The EmsCalc utility estimates the hourly link emissions for one user-specified county using the emissions factors (either from RatesCalc or RatesAdj), the 24-hour or time period VMT mix, the hourly link VMT and speeds activity estimates (either from TRANSVMT or VirtualLinkVMT), and the off-network activity (SHP, starts, and SHI). This utility produces a tab-delimited output summary (including hourly and 24-hour totals) and hourly link emissions output files (optional). The primary inputs to EmsCalc are: emissions factors from RatesCalc or RatesAdj; link-based hourly VMT and speeds developed with the TRANSVMT or VirtualLinkVMT utility. For each link, the following information is input to EmsCalc: link start node, link end node, link county number, link roadway type number, link area type number, link VMT, and link operational speed estimate; 24-hour or time period VMT mix by roadway type, MOVES SUT, and MOVES fuel type; and Off-network activity (SHP, starts, SHI, and APU hours) by hour and SUT/fuel type.

The emissions estimation can be categorized by two basic types based on the type of emissions factors: the roadway-based emissions and the off-network-based emissions. For the roadway-based emissions (tirateperdistance emissions factors), the VMT for each link is distributed to each of the SUT/fuel type combinations listed in the VMT mix by roadway type (as designated in the VMT roadway type designations). For link speeds greater than 75 mph, the emissions factors for 75 mph are used. For link speeds less than 2.5 mph, the emissions factors for 2.5 mph are used. For those link speeds that fall between the 16 MOVES speeds, the emissions factors are interpolated using the emissions factor interpolation methodology in the following section. For the off-network emissions, the ttirateperstart, ttirateperhour, and ttiratepershp emissions rates (by SUT/fuel type)

are multiplied by the appropriate activity, which is determined by the emissions process.

The emissions estimates are output in a tab-delimited file (including all of the SUT/fuel type combinations listed in the VMT mix on a single line, separated by a tab character) for the specified county by pollutant, link roadway type, and SUT/fuel type combination for each of the specified episode time periods. A 24-hour (or total if all 24 hours are not specified) output is also included in the tab-delimited file.

### EXAMPLE EMISSIONS FACTOR INTERPOLATION

To calculate emissions factors for link speeds that fall between two of the 16 MOVES speed bin speeds, an interpolation methodology similar to the methodology used with MOBILE6 is used. This methodology interpolates each emissions factor using a factor developed from the inverse link speed and the inverse high and low bounding speed bin speeds. The following is an example for a link speed of 41.2 mph.





The interpolated emissions factor ( $EF_{Interp}$ ) is expressed as:

$$EF_{Interp} = EF_{LowSpeed} - FAC_{Interp} \times (EF_{LowSpeed} - EF_{HighSpeed})$$

Where:

$EF_{LowSpeed}$  = emissions factor (EF) corresponding to the speed below the average link speed;

$EF_{HighSpeed}$  = EF corresponding to the speed above the average link speed; and

$$FAC_{Interp} = \left( \frac{1}{Speed_{link}} - \frac{1}{Speed_{low}} \right) / \left( \frac{1}{Speed_{high}} - \frac{1}{Speed_{low}} \right)$$

Given that:

$EF_{LowSpeed} = 0.7413 \text{ g/mi};$

$EF_{HighSpeed} = 0.7274 \text{ g/mi};$

$Speed_{link} = 41.2 \text{ mph};$

$Speed_{low} = 40 \text{ mph};$  and

$Speed_{high} = 45 \text{ mph}.$

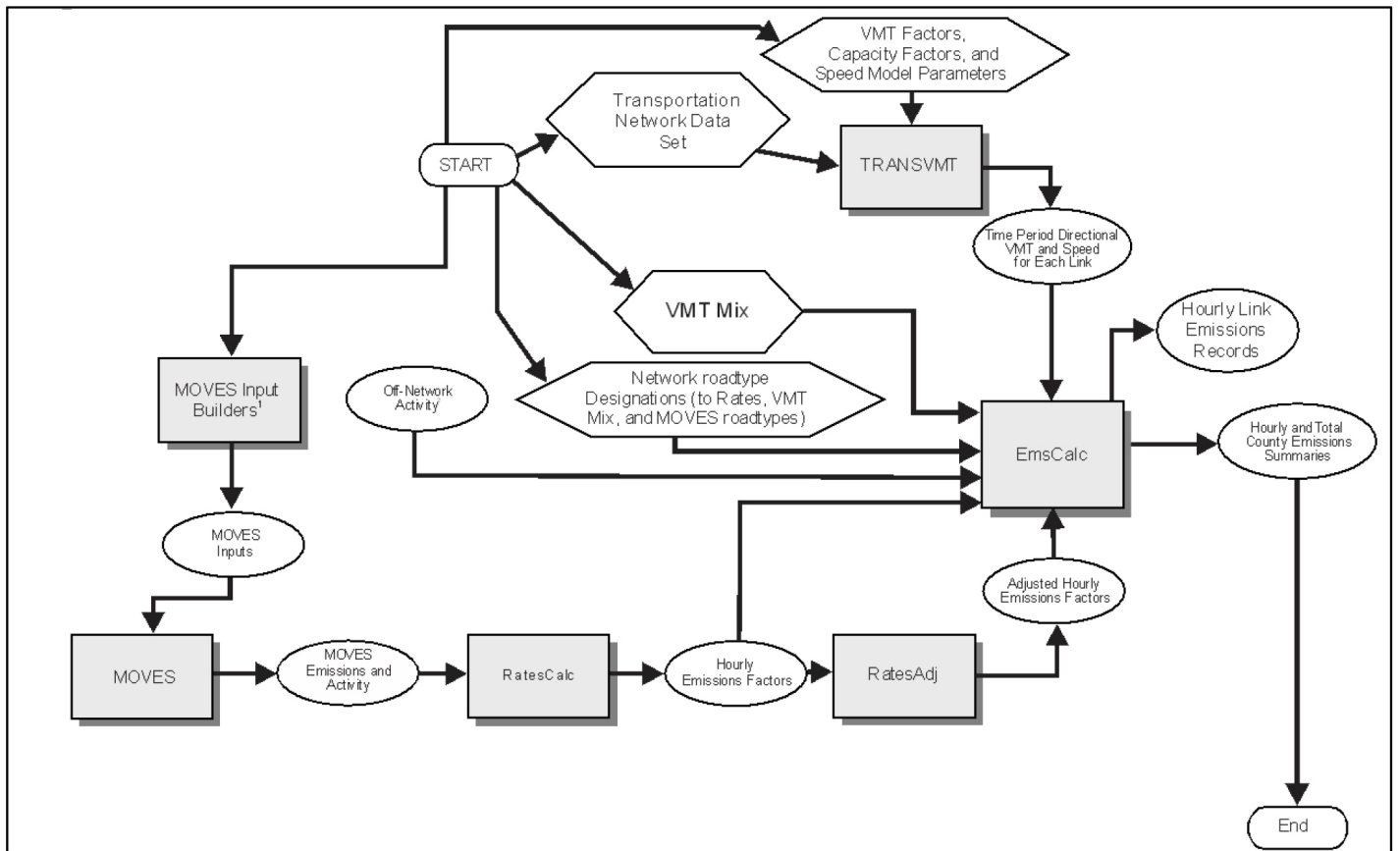
$$FAC_{Interp} = \left( \frac{1}{41.2mph} - \frac{1}{40mph} \right) / \left( \frac{1}{45mph} - \frac{1}{40mph} \right) = \frac{-0.00073}{-0.00278} = 0.26214;$$

$$EF_{Interp} = 0.7413 \text{ g/mi} - (0.26214) \times (0.7413 \text{ g/mi} - 0.7274 \text{ g/mi});$$

$$= 0.7377 \text{ g/mi}.$$

The following diagram shows the overall emissions estimate process flow.

**DIAGRAM 1: TRAVEL DEMAND MODEL NETWORK LINK-BASED HOURLY MOVES EMISSIONS ESTIMATES**



1) MOVESactivityInputBuild, MOVESfleetInputBuild, MOVESmetInputBuild, and VehPopulationBuild.

2) VehPopulationBuild, and OffNetActCalc.



## 6.4 FINAL EMISSION ANALYSIS RESULTS

### 6.4.1 NETWORK-BASED MODEL

Table 12 is a summary of the VMT and associated PM<sub>10</sub> emissions for the summer\winter season emissions.

**TABLE 12: PM10 EMISSION DATA**

| YEAR | SEASON | VMT <sup>1</sup> | PM10 EMISSIONS (TONS/DAY) |
|------|--------|------------------|---------------------------|
| MVEB | --     | --               | <b>12.05</b>              |
| 2022 | Summer | 19,128,588       | 7.03                      |
|      | Winter | 19,966,701       | 7.61                      |
| 2032 | Summer | 20,964,269       | 7.85                      |
|      | Winter | 21,882,121       | 8.47                      |
| 2040 | Summer | 22,428,178       | 8.36                      |
|      | Winter | 23,410,123       | 9.02                      |
| 2050 | Summer | 24,561,930       | 9.09                      |
|      | Winter | 25,637,294       | 9.81                      |

1) VMT are from summer and winter action assignments. Using 2017 weather station data.

Source: Texas A&M Transportation Institute

Summaries of the VMT and associated VOC and NO<sub>x</sub> emissions for the summer season emissions (June through August weekday (average Monday through Friday)) for El Paso County (Table 13) and for the portion of Doña Ana County near Sunland Park, NM nonattainment area (Table 14) are included below.

**TABLE 13: SUMMER SEASON VOC AND NOX EMISSION DATA EL PASO COUNTY<sup>1</sup>**

| YEAR | TOTAL VEHICLE MILES OF TRAVEL (INCLUDING INTRAZONAL) | VOC EMISSIONS (TONS/DAY) | NO <sub>x</sub> EMISSIONS (TONS/DAY) |
|------|--|--------------------------|--------------------------------------|
| MVEB | --   | <b>36.23</b>             | <b>39.76</b>                         |
| 2022 | 19,128,588   | 7.01                     | 13.02                                |
| 2032 | 20,964,269   | 3.99                     | 6.95                                 |
| 2040 | 22,428,178   | 3.07                     | 5.93                                 |
| 2050 | 24,561,930   | 2.90                     | 6.10                                 |

1) All values are average summer weekday estimates. The VMT listed are used to calculate the average speed. Using 2017 weather station data.



**TABLE 14: SUMMER SEASON VOC AND NOX EMISSION DATA DOÑA ANA NONATTAINMENT AREA <sup>1,2</sup>**

| YEAR | TOTAL VEHICLE MILES OF TRAVEL<br>(INCLUDING INTRAZONAL) | VOC EMISSIONS<br>(TONS/DAY) | NO <sub>x</sub> EMISSIONS<br>(TONS/DAY) |
|------|---|-----------------------------|---|
| 2017 | 94,140  | 0.05                        | 0.11                                    |
| 2022 | 118,910   | 0.05                        | 0.08                                    |
| 2032 | 125,892   | 0.02                        | 0.04                                    |
| 2040 | 128,796   | 0.02                        | 0.03                                    |
| 2050 | 134,868   | 0.02                        | 0.03                                    |

1) All values are average summer weekday estimates. The VMT listed are used to calculate the average speed. Using 2017 weather station data.

2) El Paso regional TDM zones comprising the Sunland Park ozone nonattainment area, in Doña Ana County, NM.

### 6.4.2 OFF-NETWORK TERMS

Off-network TERM have not been included in the El Paso SIP, thus there is no requirement to make adjustment.

### 6.4.3 SUMMARY

The VOC, NO<sub>x</sub> (Ozone) and PM<sub>10</sub> emissions from the travel demand model all meet the MVEB requirements without any adjustments or additional credits required from VMEP, TERM, or TCMs for the County of El Paso. All VOC and NO<sub>x</sub> emissions from the travel demand model meet the requirements as establish on the [“Transportation Conformity Guidance for 2015 Ozone NAAQS Nonattainment Areas”](#) without any adjustments or additional credits required from VMEP, TERM, or TCMs.

This conformity determination demonstrates that the total emissions calculated from the modeled roadway network for future years will be no greater than the baseline year emissions (2017) as required for the interim emissions test no-greater-than baseline year for the portion of Doña Ana County near Sunland Park, NM. **Table 14** provides

the conformity results for the VOC and NO<sub>x</sub> no greater-than-baseline year emissions tests. As well, this conformity determination demonstrates that the total emissions calculated from the modeled roadway network for future years will be at levels below the MVEB. Table 13 and 12 provide the conformity results for VOC, NO<sub>x</sub> and PM<sub>10</sub> budget tests, respectively.

For the purpose of this conformity determination per guidance from the consultative partners, meteorological inputs to MOVES2014b for VOC, NO<sub>x</sub> and PM<sub>10</sub> analysis were from year 2017.







## SECTION 7.0 INTERAGENCY CONSULTATION

### 7.1 PROCESS DESCRIPTION

Section 176(c)(4)(B)(i) of the FCAA contain the guidelines that are used by the EPMPO during the interagency consultation process for conformity. Based on these guidelines, the EPMPO must provide the opportunity for consultation with the group of partners listed below prior to the conformity determination. Preliminary technical meetings are held with the consultative partners and the EPMPO to discuss the planning process prior to the commencement of emissions modeling. The modeling parameters, planning assumptions, as well as the type of model to be used are discussed with the consultative partners.

Upon conclusion of the preliminary technical meetings, the emissions modeling process begins. Once the emissions estimates are developed, they are included in the transportation conformity report. If there is a need to re-evaluate the emissions estimates and conduct additional modeling, the consultative partners are notified.

The EPMPO provides a 30-day public comment period. At the end of the 30-day public comment period, the conformity report is prepared for submittal to the TPB for review. The finalized conformity document is then sent to all consultative partners for the beginning of a 90-day review period, in which the consultative partners provide comments on the conformity document before final approval. The EPMPO responds to all comments, and as needed, incorporates the requested edits into the conformity document. Once all edits have been incorporated, the conformity document may be submitted to the consultative partners for final review of the transportation conformity report.

The consultative procedures specifically require coordination with the following government agencies during the Transportation Conformity Determination development process and for the interagency review:

- EPA
- FHWA (Texas and New Mexico)
- FTA
- TxDOT
- TCEQ
- NMDOT
- NMED

The EPMPO's committee structure helps to ensure that the consultative requirements are met during the Transportation Conformity Determination development process. TxDOT, NMDOT, and NMED are members of the TPAC of the MPO. This committee recommends approval of the MTP, the TIP, and recommends submittal of the TCR to the TPB.

All documents are submitted to all the consultative partners including the Texas and New Mexico Divisions of the FHWA.

Interagency consultation efforts conducted for this conformity determination included the development of a Pre-Analysis Consensus Plan, multiple consultation conference calls with the Consultative Group, and the opportunity for review and comments on the transportation conformity determination document by the consultation partners.

The Pre-Analysis Consensus Plan and Comment/Response matrices specific to this conformity determination can be found in Appendix F.



## SECTION 8.0 PUBLIC PARTICIPATION

The goal of the Public Participation Program (PPP) is to involve the community in a proactive planning effort that provides the opportunity for input in the early stages of the conformity determination. The guidelines followed for public participation can be found at the following link:

<https://www.elpasompo.org/media/PublicParticipationPlan/PublicParticipationPlan.pdf>

The 45-day public comment period began January 24<sup>th</sup> and ended March 9<sup>th</sup>. Further, public meetings were conducted February 3<sup>rd</sup> through February 21<sup>st</sup> as part of the public involvement process defined in the EPMPO PPP, as well as to give the public and stakeholders a chance to view the draft plan and make comment before final adoption. The MPO held a series of public meetings to present the Draft RMS 2050 MTP document, Draft FY2023-

2026 Transportation Improvement Program (TIP), and Draft Transportation Conformity Report simultaneously. Electronic copies of the draft documents were available on the EPMPO website for public viewing and hard-copies may be available upon request. The table below outlines the meeting dates and locations of the public outreach. A video recording of the presentation was also posted on the EPMPO website during the 45-day public comment period for those unable to attend the meetings. Information was also provided via social media.

Copies of the draft transportation conformity report, RMS 2050 and 2023-2026 TIP can be provided free of charge on social media and on the El Paso MPO website, however, copies of over-sized or lengthy materials were available at reproduction and postage costs consistent with the State of Texas Comptroller's policy. Electronic copies (Adobe (pdf) format) of draft documents and major updates are posted on the MPO website for public viewing.

**TABLE 15: MTP, TIP, AND TCR REVIEW PUBLIC MEETING DATES AND LOCATIONS**

| DATE              | TIME        | LOCATION                                       | ADDRESS   |
|-------------------|-------------|--|---|
| February 3, 2022  | 6pm to 8pm  | El Paso MPO Boardroom (Suite 103) <sup>1</sup> | 211 N. Florence, El Paso, TX 79901  |
| February 9, 2022  | 11am to 1pm | Virtual Meeting <sup>2</sup>                   | <a href="https://www.elpasompo.org/RMS2050MTP">https://www.elpasompo.org/RMS2050MTP</a> |
| February 15, 2022 | 3pm to 5pm  | Virtual Meeting <sup>2</sup>                   | <a href="https://www.elpasompo.org/RMS2050MTP">https://www.elpasompo.org/RMS2050MTP</a> |
| February 21, 2022 | 6pm to 8pm  | Virtual Meeting <sup>2</sup>                   | <a href="https://www.elpasompo.org/RMS2050MTP">https://www.elpasompo.org/RMS2050MTP</a> |

1) Due to increased safety precautions implemented as a result of the ongoing COVID-19 pandemic, one public meeting will be conducted in a hybrid format which provided both an in-person meeting, as well as a virtual meeting option to join by phone and/or computer via link on the MPO website.

2) Due to increased safety precautions implemented as a result of the ongoing COVID-19 pandemic, the remaining public meetings were held exclusively in a virtual format with option to join by phone and/or computer via link on the MPO website.



During the 45-day public comment period for the RMS 2050 MTP, RMS 2023-2026 TIP, and Transportation Conformity Report, a total of four public meetings were held at various dates and times to allow for greater participation from the public. The first of these meetings was held in a hybrid (in-person and virtual) setting, while the remaining three meetings were held virtually via Microsoft TEAMS.

Overall, there were a total of 24 public meeting attendees. Meetings were held in an open-house style format, with a presentation provided by staff, followed by discussion which included comments, questions, and answers. Throughout the four meetings, several topics were mentioned by the public with many recurring themes such as: continuing discussions with entities; goals to work towards; pollution/air quality conformity; MPO processes; safety; as well as project specific items. A transcript of the comments and MPO responses from these meetings can be found as part of the comment record.

At the February 18, 2022 Transportation Policy Board meeting, MPO staff delivered a status report on the progress of the ongoing 30-day public involvement process. A total of nine members of the public provided comments on the agenda item: five were provided via email and read aloud during the meeting, while four individuals attended the meeting and commented live. Several topics were mentioned throughout the comments, including the Downtown 10 project, project funding, as well as multimodal opportunities. Several public comments provided were also in reference to a report reviewing the Downtown 10 project. This report was funded by El Paso County and written by their consultant, Smart Mobility. A draft version of the report was submitted as part of a comment provided by El Paso County. As part of this report, information and findings were presented which mentioned urban freeway congestion, evaluations

of the models used, impacts of freeway expansion, and recommendations on the project. A transcript of the comments from this meeting and MPO responses can be found as part of the comment record.

The MPO received comment both at public meetings and at the February 18, 2022 TPB meeting requesting that the public involvement period be extended to provide more time for review of the documents. The MPO did extend the public comment period in response to these comments, from 30 days to 45 days.

The MPO received a total of 53 comments through all other means: 49 comments via email and four via the "Contact Us" form on the EPMPO website. A variety of topics were mentioned in these comments, with several regarding specific projects such as Border Highway East and Downtown 10, pollution/air quality concerns, funding, congestion/traffic, as well as MPO processes. These comments and the MPO's responses can be found as part of the comment record. A total of 62 individual comments were received during the 45-day comment period.

Some public comments in the matrix either reference separate attachments or were too large or complex to fit in the matrix themselves. These can be found as attachments 1 thru 7. Also, given that some of the MPO responses to these comments and others were so large, these responses can be found as attachments 8 thru 11. All eleven attachments are notated in the matrix as well. Overall, the public comment and response record includes the transcripts, comment matrix, and these attachments. The public comment and response recorded is also included as Appendix K of the Transportation Conformity Report.

