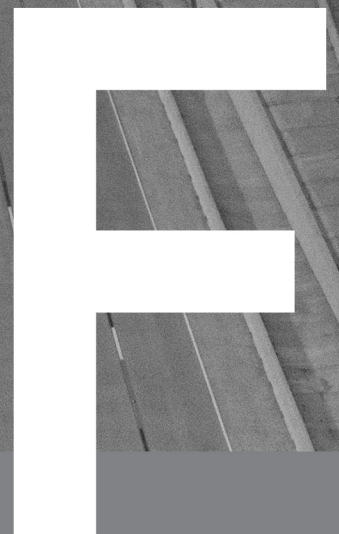


APPENDIX: INTERAGENCY CONSULTATION



Transportation Conformity Pre-Analysis Consensus Plan

EL PASO METROPOLITAN PLANNING ORGANIZATION



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PACP Submission Information

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

TABLE OF CONTENTS

Table of Contents.....	2
List of Tables.....	3
1 The purpose of Transportation Conformity Emissions Analysis.....	4
2 Timeline for the Transportation Conformity Document Development.....	7
3 Metropolitan Transportation Plan (MTP) or Regional Transportation Plan (RTP) / Transportation Improvement Program (TIP)	7
3.1 Definition of Regionally Significant Projects (from 40 CFR §93.101).....	7
4 Applicable State Implementation Plan (SIP), related Emissions Budget, and Transportation Control Measures (TCM).....	8
5 Conformity Analysis Years	8
6 Demographic Used in Conformity Analysis.....	9
7 Travel Demand Model.....	10
8 Emission Modeling.....	12
9 MOVES Input.....	13

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LIST OF TABLES

Table 1. Reasons for the Transportation Conformity Emissions Analysis (40 CFR § 93.104).....	4
Table 2. Anticipated Transportation Conformity Timeline	7
Table 3. MTP or RTP / TIP.....	7
Table 4. Applicable SIP and Emissions Budget(s).....	8
Table 5. TCM strategies, if applicable.....	8
Table 6. Conformity Analysis Years	8
Table 7. Demographics	9
Table 8. Land-Use Model	10
Table 9. Projects.....	10
Table 10. Travel Demand Model	11
Table 11. Seasonal Factor.....	11
Table 12. Hourly Distribution Factors.....	11
Table 13. Emission Modeling.....	12
Table 14. MOVES Input Parameters and data source.....	14
Table 15. Fuel Supply.....	18
Table 16. Fuel Properties.....	19
Table 17. Hourly Meteorological Data	20
Table 18. I/M Inputs	21
Table 19. MOVES Emissions Factor Post-Processing to be Performed by County and Year.....	21
Table 20. Emission Controls Used for Conformity Credit	22

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1 THE PURPOSE OF TRANSPORTATION CONFORMITY EMISSIONS ANALYSIS

Table 1. Reasons for the Transportation Conformity Emissions Analysis (40 CFR § 93.104)

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

A. Explanation:

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

B. Non-attainment status:

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

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

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

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

C. Projects to be amended:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Additional Model Updates

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

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

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

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2 TIMELINE FOR THE TRANSPORTATION CONFORMITY DOCUMENT DEVELOPMENT

Table 2. Anticipated Transportation Conformity Timeline

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

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

Table 3. MTP or RTP / TIP

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

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

A regionally significant project means a transportation project (other than projects that may be grouped in the TIP and/or Statewide Transportation Improvement Program (STIP) or exempt projects as defined in EPA’s transportation conformity regulation [40 CFR § part 93]) is a facility that serves regional transportation needs (such as access to and from the area outside the region; major activity centers in the region; major planned developments such as new retail malls, sports complexes, or employment centers, or transportation terminals) and would normally be included in the modeling of the metropolitan area’s transportation network. At a minimum, this includes all principal arterial highways and all fixed guided way transit facilities that offer a significant alternative to regional highway travel.

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

Table 4. Applicable SIP and Emissions Budget(s)

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

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

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

Table 5. TCM strategies, if applicable.

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

5 CONFORMITY ANALYSIS YEARS

Per CFR § 93.106(a)(1)(i) – Analysis years cannot be more than 10 years apart.

Table 6. Conformity Analysis Years

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

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

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

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

6 DEMOGRAPHIC USED IN CONFORMITY ANALYSIS

Table 7. Demographics

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

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

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

7 TRAVEL DEMAND MODEL

Table 8. Land-Use Model

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

Table 9. Projects

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

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

Table 10. Travel Demand Model

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

Table 11. Seasonal Factor

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

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

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

Table 12. Hourly Distribution Factors

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

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

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

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

8 EMISSION MODELING

Table 13. Emission Modeling

Pollutants Reported		
Pollutants	PM ₁₀ , VOC, and NO _x	PM ₁₀
Emission Factor Development		
Emission Model Version ¹	MOVES 3.1.0	MOVES 3.1.0
Years Modeled	2017, 2022, 2027 ² , 2032, 2040, 2050	2022, 2027 ² , 2032, 2040, 2050
Time periods	Summer Weekday	Winter Weekday
Functional Class	Urban restricted, Rural restricted, Urban unrestricted, Rural unrestricted	Urban restricted, Rural restricted, Urban unrestricted, Rural unrestricted

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

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

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

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

9 MOVES INPUT

Table 14. MOVES Input Parameters and data source

Input Parameter	Description	Base Data Source	Notes
Vehicle Population by Source Type	Input the number of vehicles in the geographic area which is to be modeled for each vehicle.	TxDMV data (year-end 2021), MOVES defaults for rates runs.	<ul style="list-style-type: none"> Local gasoline and diesel-powered source type populations by analysis year is estimated for use external to MOVES in the estimation of county level vehicle starts and source-hours-parked, needed in the external emissions calculations, per TTI's rates-per-activity, TDM-based method. Populations by SUT and fuel type are a function of TxDMV year-end vehicle registration data and VMT mix, and in the case of base and future years, population scaling factors.
Fleet Age Distribution by Source Type	Input that provides the distribution of vehicle counts by age for each calendar year and vehicle type. TxDMV registration data is used to estimate the age distribution of vehicle types up to 31 years.	TxDMV data (year-end 2018 and 2021), MOVES defaults for refuse trucks, motor homes, and buses.	<ul style="list-style-type: none"> Age distributions will be developed using TxDMV registration data aggregated at the county level for all source types except the single-unit long-haul source types, which will be statewide level. Since no 2017 registration data is available for use with the 2017 baseline, the 2018 TxDMV data will be used for the 2017 baseline for age fraction. For all future analysis years 2021 TxDMV data will be used. The distribution of Age fractions should sum up to 1.0 for each source use type for each analysis year.
Fleet VMT by HPMS Vehicle Type	County specific VMT is distributed to 6 HPMS Vehicle types	MOVES defaults for rates runs.	<ul style="list-style-type: none"> Local activity estimates are applied in emissions calculations external to MOVES.
Road Type VMT distributions	fractions of VMT across the four MOVES road types, for each source type. .	MOVES defaults for rates runs.	<ul style="list-style-type: none"> Local activity estimates are applied in emissions calculations external to MOVES. VMT fraction is distributed between the road type and must sum to 1.0 for each source type.
Average Speed Distribution	Input average speed data specific to vehicle type, road type, and	MOVES defaults for rates runs.	<ul style="list-style-type: none"> Local activity estimates are applied in emissions calculations external to MOVES.

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

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

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

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Table 15. Fuel Supply

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

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

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

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Table 16. Fuel Properties

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

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

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

Table 17. Hourly Meteorological Data

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

Table 18. I/M Inputs

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

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

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

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

Table 20. Emission Controls Used for Conformity Credit

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

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Pre-Analysis Consensus Plan Comment and EPMPPO Response Matrix

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

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

DOCUMENT: PREANALYSIS PLAN FOR CONSENSUS

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

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

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

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

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Page	Section	EPA Comment/Suggestion, dated January 5,2024	EPMPO Response 1/8/2024																														
8	Table 4. Applicable SIP and Emissions Budget(s)	<p>a) I’m unclear as to the inclusion of 2015 as the attainment year for the El Paso County 1979 1-hour Ozone MVEBs. The attainment year for these MVEBs is 1996.</p> <ul style="list-style-type: none"> Given the age of the El Paso PM10 MVEB and the El Paso County NOx and VOC MVEBs, inclusion of the associated attainment years in this table may be more confusing than clarifying. I defer to the partners’ preference for keeping/deleting these MVEB attainment years. <p>b) It may be helpful to add an “area boundary” column to distinguish how these SIPs apply to the area being evaluated.</p> <p>c) Agree with TCEQ’s suggestion to use footnote 1 to explain Sunland Park lack of MVEBs.</p> <ul style="list-style-type: none"> I’m unclear for the benefit/need of the second sentence in footnote 1: “When reclassified to moderate, the attainment year for the Doña Ana County ozone nonattainment area will be 2023”. I recommend removal of this sentence. <p>A revised version of Table 4 incorporating these suggested edits, for the partners’ consideration:</p> <table border="1" data-bbox="674 837 1921 1133"> <thead> <tr> <th>SIP</th> <th>Area Boundary</th> <th>Attainment Year</th> <th>Pollutant</th> <th>Emission Budget (TPD)</th> </tr> </thead> <tbody> <tr> <td>1987 PM10 SIP</td> <td>El Paso (1991 city limits)</td> <td>1994</td> <td>PM10</td> <td>12.05</td> </tr> <tr> <td>1-hour Ozone SIP</td> <td>El Paso County</td> <td>1996</td> <td>VOC</td> <td>36.23</td> </tr> <tr> <td>1-hour Ozone SIP</td> <td>El Paso County</td> <td>1996</td> <td>NOx</td> <td>39.76</td> </tr> <tr> <td>N/A</td> <td>Sunland Park</td> <td>N/A</td> <td>VOC</td> <td>N/A¹</td> </tr> <tr> <td>N/A</td> <td>Sunland Park</td> <td>N/A</td> <td>NOx</td> <td>N/A¹</td> </tr> </tbody> </table> <p>¹Since there are no adequate or approved budgets for the Doña Ana County ozone nonattainment area, an interim emissions test will be used. Per §93.119(g), the first analysis year may be no more than five years beyond the year in which the determination is being made.</p>	SIP	Area Boundary	Attainment Year	Pollutant	Emission Budget (TPD)	1987 PM10 SIP	El Paso (1991 city limits)	1994	PM10	12.05	1-hour Ozone SIP	El Paso County	1996	VOC	36.23	1-hour Ozone SIP	El Paso County	1996	NOx	39.76	N/A	Sunland Park	N/A	VOC	N/A ¹	N/A	Sunland Park	N/A	NOx	N/A ¹	<p>a) An email will be sent to request the partners’ preference for keeping/deleting the “Attainment Year” column?</p> <p>b) The revised version of Table 4 incorporating these suggested edits has been incorporated to the document.</p> <p>c) The document has been revised and footnote suggested has been incorporated.</p>
SIP	Area Boundary	Attainment Year	Pollutant	Emission Budget (TPD)																													
1987 PM10 SIP	El Paso (1991 city limits)	1994	PM10	12.05																													
1-hour Ozone SIP	El Paso County	1996	VOC	36.23																													
1-hour Ozone SIP	El Paso County	1996	NOx	39.76																													
N/A	Sunland Park	N/A	VOC	N/A ¹																													
N/A	Sunland Park	N/A	NOx	N/A ¹																													

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

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

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

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

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