

EPMPO Pre-Analysis Consensus Plan

#	Page	Section/Table	FHWA Comments November 24, 2025	EPMPO Responses December 17, 2025
1	2	Table	Please clarify basis for a 2022 beginning year for the time-frame covered by the MTP (2022-2052). It is understood that this a new plan to be adopted by the MPO Policy Board in 2026.	The time frame covered by the MTP (2026 -2052). Document revised on page 2 table, table 1 (page 7) and table 3 (page 10).
2	2	Table	Please clarify basis for the 2022 analysis year reflected in the table on this page.	2022 is the validation year for the Travel Demand model and it would not be an analysis year. Table has been revised. EPMPO Response 12/19/2025: Since 2022 is not an analysis year this comment has been resolved.
3	8	Section 1 Second Paragraph	The discussion in this section indicates that Texas Demographic Center projections were used to develop control totals for the Texas and New Mexico EPMPO areas. Does the Texas Demographic Center provide demographic information for New Mexico. Please clarify.	The IDSER team at UTSA developed the demographic (population, households, and household income) and employment control totals for both Texas and New Mexico using federal data sources specific to each state—including the Census Bureau and the Bureau of Labor Statistics—for the historical and current (base-year) estimates. For forecast years, we used the most current projections from the Texas Demographic Center (TDC) for Texas, while for New Mexico we relied on the population projections produced by The University of New Mexico’s Geospatial and Population Studies program (https://gps.unm.edu/pop/population-projections.html). We also applied the same forecasting methodology to employment, projecting future employment counts using historical Quarterly Census for Employment and Wages (QCEW) data from BLS for both states. In short, TDC projection data were used only for Texas, and New Mexico forecast year control totals were based on New Mexico–specific projection sources.
4	8	Section 1 Second Paragraph	Please clarify intent of the first sentence in this paragraph concerning "... and distributing following Urbanism recommendation."	The sentence has been reworded" spatially distributed from region level to traffic analysis zone level using the UrbanSim land use model."
5	10	Section 3 First Paragraph	The discussion in this section describes regionally significant projects consistent with 40 CFR 93. It is recommended that the MPO consider development of region specific parameters to be utilized in	The paragraph has been reworded. EPMPO continue reviewing it and PACP revised version will be send.

			determining regionally significant projects.	EPMPO Response 1/11/2026: EMPO has reviewed the definition of “regionally significant,” and the paragraph has been reworded accordingly.
6	11	Section 4 Table 4	Recommend that Table 4 be revised to identify the applicable SIP and/or non-attainment area associated with the corresponding pollutant and/or emission budget.	Table has been updated.
7	12	Section 5 Table 6	Please clarify reference to 2022 as the Baseline Conformity Year. As reflected in footnote 1, the Baseline Year is 2017 for purposes of the interim emissions tests.	The 2022 year has been removed and 2017 has been added as the baseline Conformity Year, as this year is only required for the interim less-than-baseline year emissions test as the baseline year for the 2015 ozone NAAQS is 2017 ((40 CFR 93.119(b)(1)(ii)). EPMPO Response 12/19/2025: Since 2022 is not an analysis year this comment has been resolved.
8	12	Section 5 Table 6	Please clarify reference to 2022 as an analysis year. It is understood that 2022 is the Travel Demand Model base year.	2022 is the base year for the Travel Demand model for the PM10 and Ozone conformity purposes for El Paso nonattainment areas and it would not be an analysis year. The table has been revised. EPMPO Response 12/19/2025: Since 2022 is not an analysis year this comment has been resolved.
9	13	Section 6 First Paragraph	The discussion in this section indicates that Texas Demographic Center projections were used to develop control totals for the Texas and New Mexico EPMPO areas. Does the Texas Demographic Center provide demographic information for New Mexico. Please clarify.	The IDSER team at UTSA developed the demographic (population, households, and household income) and employment control totals for both Texas and New Mexico using federal data sources specific to each state—including the Census Bureau and the Bureau of Labor Statistics—for the historical and current (base-year) estimates. For forecast years, we used the most current projections from the Texas Demographic Center (TDC) for Texas, while for New Mexico we relied on the population projections produced by The University of New Mexico’s Geospatial and Population Studies program (https://gps.unm.edu/pop/population-projections.html). We also applied the same forecasting methodology to employment, projecting future employment counts using historical Quarterly Census for Employment and Wages (QCEW) data from BLS for both states. In short, TDC projection data were used only for

				Texas, and New Mexico forecast year control totals were based on New Mexico-specific projection sources.
10	13	Section 6 First Paragraph	Please clarify intent of the first sentence in this section concerning "... and distributing following Urbanism recommendation."	The sentence has been reworded "... spatially distributed from region level to traffic analysis zone level using the UrbanSim land use model."
11	13	Section 6 Table 7	Please clarify the applicability of Texas State Demographer data to the New Mexico control totals for population, employment and socioeconomic demographics reflected in Table 7.	The IDSER team at UTSA developed the demographic (population, households, and household income) and employment control totals for both Texas and New Mexico using federal data sources specific to each state—including the Census Bureau and the Bureau of Labor Statistics—for the historical and current (base-year) estimates. For forecast years, we used the most current projections from the Texas Demographic Center (TDC) for Texas, while for New Mexico we relied on the population projections produced by The University of New Mexico's Geospatial and Population Studies program (https://gps.unm.edu/pop/population-projections.html). We also applied the same forecasting methodology to employment, projecting future employment counts using historical Quarterly Census for Employment and Wages (QCEW) data from BLS for both states. In short, TDC projection data were used only for Texas, and New Mexico forecast year control totals were based on New Mexico-specific projection sources.
12	14	Section 6 Table 9	Please provide data utilized to calculate the HPMS correction factor.	Appendix A- Methodology to calculate the HPMS factor
13	14	Section 7 Table 10	Pending resolution concerning the applicability of a 2022 analysis year, recommend revision of historical year adjustment factor as appropriate.	As traditional practice TTI applied one set of the ATR based seasonal adjustment factors for all historic and future years analysis. It is based on the latest available 10-year ATR data (2014-2023) for consistency, as well as minimizing the impact of data collected during the COVID period. EPMPPO Response 12/19/2025: Since 2022 is not an analysis year this comment has been resolved.
14	14	Section 7 Table 10	Please provide data (calculations) utilized to develop the future and historical years seasonal adjustment factors.	Appendix A-Methodology to calculate the HPMS factor

15	14	Section 7 Table 10	Footnote 2 indicates that the historical years adjustment factors were calculated utilizing the 2014-2023 El Paso County ATR data. It is noted that this appears to be the same data used to calculate the future years adjustment factors. Please clarify.	<p>For historic years, the summer seasonal adjustment is applied to the AADT VMT obtained from the TxDOT HPMS VMT to adjust the AADT VMT to seasonal VMT. Then the TDM VMT is adjusted to the seasonal VMT which then is used for emissions modeling</p> <p>For future years, the seasonal adjustment (ANSWT to ASWT) is applied to TDM VMT along with HPMS factor to convert to seasonal VMT.</p> <p>Both of the factors are derived from same set of the ATR data but the base scenario is different as illustrated in the notes.</p> <p>EPMPO Response 12/19/2025: Since 2022 is not an analysis year this comment has been resolved.</p>
16	15	Section 7 Table 11	Please clarify the intent of the second sentence in Footnote 1.	It was from the conformity template and the foot note has been updated
17	16	Section 8 Table 12	Please clarify reference to "Base Year 2022" in the "Years Modeled" row for the Summer and Winter Weekday columns. It is understood that 2017 is the Baseline Year for the ozone related interim tests.	<p>2022 is removed as the base year for summer and winter scenarios.</p> <p>EPMPO Response 12/19/2025: Since 2022 is not an analysis year this comment has been resolved.</p>
18	16	Section 8 Table 12	Please confirm that mid-year 2023 data is the latest available vehicle registration data from TxDMV, as referenced for the "VMT Mix" item.	Yes, the 2023 mid-year data is the latest available registration data. And the wording change is made to clarify.
19	16	Section 8 Table 12	For the "Vehicle Registration" item, will TxDMV 2018 year-end vehicle registration data be utilized for the 2017 Baseline Year summer weekday period? Please clarify.	<p>The newly formatted registration data set that TTI received only goes back to 2021. So TTI suggest using the 2021 mid-year registration data and scale back the vehicle population from 2021 to 2017 using the VMT growth rate.</p> <p>And the vehicle population derived from the 2023 mid-year data are scaled for all future years (2023 and beyond). Text revised.</p>
20	16	Section 8 Table 12	Please clarify reference to 2022 as the "Baseline Year" for the MOVES External Condition items. It is	2022 is removed as base year for winter scenario.

			understood that 2017 is the Baseline Year for the ozone related interim emission tests.	EPMPO Response 12/19/2025: Since 2022 is not an analysis year this comment has been resolved.
21	17	Section 9 Table 13	Please clarify reference to "electricity" in the "Notes" column of the "Vehicle Population by Source Type" item.	Electric vehicles will be modeled in MOVES4 where vehicle fuel type is electricity. TTI is using the same term that is employed in MOVES.
22	17	Section 9 Table 13	Please clarify reference to TxDMV year-end vehicle registration data in the "Notes" column of the "Vehicle Population by Source Type" item. It is noted that the "Base Data Source" column for this item reflects mid-year 2023 TxDMV data.	It should be mid-year. Change has been made.
23	17	Section 9 Table 13	Please clarify reference to 2023 TxDMV data being used for the 2017 baseline year in the "Notes" column of the "Fleet Age Distribution by Source Type" item. It is noted that the previous transportation conformity analysis utilized available 2018 year-end TxDMV data for the 2017 baseline year.	The newly formatted registration data set that TTI received only goes back to 2021. TTI suggest using the age distribution from 2021 mid-year data for the 2017 analysis year. The age distribution derived from the 2023 mid-year data for all future years (2023 and beyond). Text revised.
24	18	Section 9 Table 13	Please clarify the "Input Parameter" reference for the Fuel Formulation item.	Failed reference. Updated the information.
25	18	Section 9 Table 13	Please clarify reference to El Paso fuel survey data in the "Base Data Source" column for the "Fuel Formulation" item. Is this intended to refer to the TCEQ fuel surveys.	Noted and changes have been made.
26	18	Section 9 Table 13	Pending resolution concerning the applicability of a 2022 analysis year, recommend revision of the "Notes" column for the "Fuel Formulation" item regarding the 2022 CG properties, as appropriate.	There is no 2022 fuel study available. TTI is using closest fuel survey that is available i.e. 2023 fuel study fuel. This study is commissioned every three years by TCEQ. EPMPO Response 12/19/2025: Since 2022 is not an analysis year this comment has been resolved.
27	19	Section 9 Table 13	Is it intended that the "Notes" column for the "Fuel Engine Fraction/Diesel Fraction" item reflect the use of TxDMV 2018 year-end data for the 2017 Baseline Year. Please clarify.	The newly formatted registration data set that TTI received only goes back to 2021. TTI suggest using the fuel engine fractions derived from 2021 mid-year data for the 2017 analysis year. The fuel engine fractions derived from the 2023 mid-year data for all future years (2023 and beyond). Text revised.
28	19	Section 9 Table 13	Please clarify the "Input Parameter" reference for the Meteorology item.	Failed reference. Updated the information.
29	19	Section 9 Table 13	Please clarify intent/application of the Source information provided at bottom of Table 13, concerning the I/M Program data.	For the I/M data, TTI further clarified that 1) I/M compliance factor estimates were calculated by TTI using TCEQ 2017 statewide compliance data and

				MOVES4 I/M compliance factor equation in MOVES4 Technical Guidance for 2017 analysis year. 2) I/M compliance factor estimates were calculated by TTI using TCEQ 2023 statewide compliance data and MOVES4 I/M compliance factor equation in MOVES4 Technical Guidance for 2023 analysis year and beyond.
30	20	Section 9 Table 14	Please clarify references to fuel formulation IDs 17101, 2311 and 30637 in this table. It is noted that these fuel formulations are not reflected in Table 15 on page 21.	Changes made. Consistent with Table 15. Added electricity fuel formulation ID.
31	21	Section 9 Table 15	Please clarify references to fuel formulation IDs 17103, 2313, 2473, 30176 and 30236 in this table. It is noted that these fuel formulations are not reflected in Table 14 on page 20.	ID in table 14 changed. Now consistent between Table 14 and 15. Added electricity fuel formulation ID.
32	21	Section 9 Table 15	Pending resolution concerning the applicability of a 2022 analysis year, recommend revision of Table 15 concerning references to 2022 fuel formulations.	There is no 2022 fuel study available. TTI is using closest fuel survey. 2023 fuel study fuel property is being applied. No changes are required. EPMPO Response 12/19/2025: Since 2022 is not an analysis year this comment has been resolved.
33	21	Section 9 Table 15	Pending resolution concerning the applicability of a 2022 analysis year, recommend revision of Footnote 1 regarding references to 2022 fuel parameters (e.g., 2022 CG properties, 2022 diesel sulfur level and 2022 biodiesel ester volume percentages).	There is no 2022 fuel study available. TTI is using closest fuel survey. 2023 fuel study fuel property is being applied. No changes are required. EPMPO Response 12/19/2025: Since 2022 is not an analysis year this comment has been resolved.
34	23	Section 9 Table 16	Please clarify basis for providing hourly temperature values for the El Paso, Dona Ana and Otero counties separately. It is noted that the summer and winter hourly temperatures are the same each county, respectively.	Modified the table and updated notes under the table to clarity.
35	23	Section 9 Table 17	Please clarify basis for providing hourly relative humidity values for the El Paso, Dona Ana and Otero counties separately. It is noted that the summer and winter hourly relative humidity is the same for each county, respectively.	Modified the table and updated notes under the table to clarity.
36	24	Section 9 Table 18	Recommend table title be revised to reflect units for Barometric Pressure.	Unit added.

37	24	Section 9 Table 18	Please clarify basis for providing barometric pressure values for the El Paso, Dona Ana and Otero counties separately. It is noted that the barometric pressure is the same for each county.	Modified the table and updated notes under the table to clarify.
38	24	Section 9 Table 19	Pending resolution concerning the applicability of 2022 analysis year, recommend revision of the "Year ID" item information reflected in this table for the "Exhaust Onboard Diagnostics (OBD) Check" and the "Evaporative Gas Cap and OBD Check" columns.	Modified the table. 2022 is no longer an analysis year. EPMPO Response 12/19/2025: Since 2022 is not an analysis year this comment has been resolved.
39	24	Section 9 Table 19	Please clarify "Year ID" item references to 2040 and 2050 in the "Exhaust Onboard Diagnostics (OBD) Check" and "Evaporative Gas Cap and OBD Check" columns. Is this intended to reflect the 2042 and 2052 analysis years?	Modified the table. Now reflecting the correct analysis years.
40	25	Section 9 Table 19	Please clarify "I/M Compliance" item values for the "Exhaust Onboard Diagnostics (OBD) Check" and "Evaporative Gas Cap and OBD Check" columns. Is it intended that separate compliance values be provided for the 2017 analysis year and future analysis years.	Modified the table. The year 2017 is now showing with 2017 values.
41	25	Section 9 Table 20	Please clarify references to "All years" and "N/A" in the "Analysis Year" and "Counties" columns, respectively, for Texas Low Emission Diesel (TxLED) Fuel. Is it intended that TxLED be applied to all analysis years. If so, recommend that the applicable counties be reflected in this table.	Modified the table. It should be "not applicable" (N/A) for all analysis years to avoid confusion.

EPMPO Pre-Analysis Consensus Plan				
#	Page	Section/Table	TCEQ Comments December 8, 2025	EPMPO Responses December 17, 2025
1	2	Table	Please explain why 2022 is an analysis year?	2022 is the validation year for the Travel Demand model for the PM10 and Ozone conformity purposes for El Paso nonattainment areas and it would not be an analysis year. The table has been revised.

				EPMPO Response 12/19/2025: Since 2022 is not an analysis year this comment has been resolved.
2	7	Section 1 Explanation:	C?	Document has been revised.
3	7	Section 1 New or Amended Transportation Improvement Program	Suggest removing as no longer necessary, but defer to EPA.	EPMPO sent an email to EPA to confirm including El Paso Ozone 2015 Ozone NAAQS emission assessment <i>“Thanks also for sharing EPMPO’s thinking on including the El Paso 2015 ozone emissions assessment. I still think it’s a good insurance policy in case of a nonattainment designation.” (Jeffrey Riley-EPA)</i>
4	11	Section 4 Table 4	Don’t think applicable but defer to EPA.	EPMPO sent an email to EPA to confirm including El Paso Ozone 2015 Ozone NAAQS emission assessment <i>“Thanks also for sharing EPMPO’s thinking on including the El Paso 2015 ozone emissions assessment. I still think it’s a good insurance policy in case of a nonattainment designation.” (Jeffrey Riley-EPA)</i>
5	11	Section 4 Table 4	Not applicable but defer to EPA.	EPMPO sent an email to EPA to confirm including El Paso Ozone 2015 Ozone NAAQS emission assessment <i>“Thanks also for sharing EPMPO’s thinking on including the El Paso 2015 ozone emissions assessment. I still think it’s a good insurance policy in case of a nonattainment designation.” (Jeffrey Riley-EPA)</i>
6	12	Section 5 Table 6	Baseline Conformity Year (if applicable) ?	Document has been revised.
7	16	Section 8 Table 6	Why is PM10 listed here?	PM10 has been traditionally analyzed for both summer and winter. El Paso was in violation of 24-hour PM10 NAAQS.
8	19	Section 9 Table 13	Table 15 (Error! Not a valid result for table.)	Document has been revised.
9	13	Section 9 Table 13	Table 16 (Error! Not a valid result for table.)	Document has been revised.
10	24	Section 9 Table 19	Year ID; Should this be 2027?	Document has been revised.
11	24	Section 9	Year ID; Should this be 2027?	Document has been revised.

		Table 19		
12	24	Section 9 Table 19	I/M Program ID / Pollutant Process ID; Why NA?	Document has been revised.

EPMPO Pre-Analysis Consensus Plan				
#	Page	Section/Table	FHWA Comments May 15, 2026	EPMPO Responses May 18, 2026
1	7	General	Recommend addition of Section numbers to the various Pre-Analysis Consensus Plan (PACP) discussions, as appropriate.	Document has been revised.
2	7	Item "c"	Table 1 identifies item "c" as "New or Amended Transportation Improvement Program." However, the item "c" explanation on this page does not appear to address the Transportation Improvement Program (TIP) but provides information concerning the non-attainment area and proposed regional emissions analysis. Recommend that information concerning the new or amended TIP be provided for this item, and/or that an appropriate heading be provided for the current discussion.	Document has been revised to include language regarding the current 2025-2028 TIP, based on the currently conforming Amended RMS 2050 MTP, and the new 2027-2030 TIP that is being reviewed by NMDOT and TxDOT, which is also consistent with the Amended RMS 2050 MTP. Once the new RMS 2052 MTP and corresponding Conformity documents are approved, the 2027-2030 TIP will be amended as needed while ensuring consistency.
3	7	Item "c"	Recommend revision of the last partial sentence on this page as follows: "The TDM has a validation year of 2022."	Document has been revised.
4	8	Item "c"	The first sentence in the first full paragraph on this page indicates control totals for the MPO area (Texas and New Mexico) were developed based on Texas Demographic Center projections. However, the response to our previous comments appears to indicate that TDC projections were only used for Texas. Please clarify and/or revise as appropriate.	The TDC has provided demographic control total projections for both Texas and New Mexico portions of the El Paso MPO area. The document has been revised to ensure this is clear.
5	9	Table 2	Please update timeframes upon completion of the PACP, as appropriate.	Document has been revised.
6	10		Recommend clarification of the regionally significant projects discussion on this page (i.e., are all roadways reflected in the El Paso MPO's travel demand model considered regionally significant).	No, not all the roadways coded in the TDM are regionally significant. The small number of non-regionally significant roadways coded in the TDM have been included to facilitate TDM performance (e.g., provide access and/or connectivity to the network from/to smaller urban TAZs or rural TAZs that are not bordered

				by regionally significant roadways). Document has been revised.
7	11	Table 5	Recommend confirmation that the 1996 one-hour ozone Super SIP does not contain any TCMs.	1996 one-hour ozone Super SIP contains TCM for El Paso with a useful life of 5 to 20 years: <ul style="list-style-type: none"> • Northeast Transit Terminal (Park and Ride Lot) • IH-10/US 54 Traffic Surveillance System • CNG Fueling Facility. El Paso region cannot claim credits for these projects given that they are beyond the 20-year useful life span.
8	13		The discussion in the first paragraph on this page indicates control totals for the MPO area (Texas and New Mexico) were developed based on Texas Demographic Center projections. However, the response to our previous comments appears to indicate that TDC projections were only used for Texas. Please clarify and/or revise as appropriate. Also, please clarify similar references in Table 7, for the Population, Employment and Socioeconomic variables.	The TDC has provided demographic control total projections for both Texas and New Mexico portions of the El Paso MPO area. The document has been revised to ensure this is clear, including Table 7.
9	13	Table 7	Did the MPO's Policy Board adopt the forecasted demographics.	Yes, the TPB approved all the data and analysis included in the documents prior to the start of the public comment period. This included the forecasted demographics.
10	14	Table 9	Recommend inclusion of data and formula utilized to develop the Highway Performance Monitoring System factor.	Footnote added to the Table 9 to provide the data and formula used to calculate the HPMS factor. El Paso MPO will include the detailed HPMS calculation document for your reference.
11	15	Table 11	Recommend clarification regarding to what data the Hourly Distribution Factors apply (e.g., VMT).	Footnote added to the Table 11 to provide where the hourly distribution factors apply.
12	16	Table 12	Footnote 3 indicates that the 2027 analysis year is only for VOC and NOx in the Sunland Park, NM non-attainment area. However, a 2027 analysis year also appears to be reflected for PM10 emissions. Please clarify.	On Table 12, 2027 was removed as an analysis year for the second column given that PM-10 analysis is not required in either NM or TX in 2027. Footnote 3 now clarifies that 2027 will only be an analysis year for the Sunland Park, NM ozone non-attainment area to satisfy the first analysis year requirement per 40 CFR 93.119(g)(1).

13	19	Table 13	Recommend that the BD ester volume discussion in the "Notes" column for the Fuel Formulation "Input Parameter" be clarified concerning reference to "... were based on 2017 and 2023 from the latest available (2023) DOE state-level ...".	Modified to avoid confusion by stating that 2017 percentages were used for 2017 analysis year and 2023 for all future years
14	19	Table 13	Please clarify reference to "district level" in the last sentence in the "Notes" column discussion for the Fuel Engine Fraction/Diesel/Electricity Fraction "Input Parameter".	Text in the table was added to clarify that "district level" refers to TxDOT-El Paso District level.
15	20	Table 13	Please clarify reference to "(Error! Not a valid result for table," in the Meteorology "Input Parameter" column.	Link fixed.
16	21	Table 13	Recommend that the sentence below Table 13 concerning I/M program data be identified as a footnote to the applicable item(s) in Table 13, as appropriate.	Footnote 1 added.
17	21	Table 14	Gasoline fuel formulation ID 2373 included in this Table does not appear to be reflected in Table 15 on page 22. Please clarify.	ID 2373 was replaced by ID 2473 in Tables 14 and 15.
18	21	Table 14	Diesel fuel formulation ID 30236 included in this Table does not appear to be reflected in Table 15 on page 22. Please clarify.	ID 30236 was deleted from Table 14.
19	24	Table 16	Please clarify intent of footnote 1, concerning El Paso being the only county modeled for emissions rates.	The conformity emissions analysis includes El Paso County, Doña Ana Area and Otero County, New Mexico. However, since the modeling inputs for New Mexico counties are not available in the same detail as Texas Counties. So we assume that all three areas are very close in terms of temperature, humidity and barometric pressure and utilize only El Paso County information. Therefore, only the values for the El Paso County is listed in the tables and as a result El Paso County emission rates are being applied to Doña Ana Area and Otero County, New Mexico.
20	25	Table 17	Please clarify intent of footnote 1, concerning El Paso being the only county modeled for emissions rates.	The conformity emissions analysis includes El Paso County, Doña Ana Area and Otero County, New Mexico. However, since the modeling inputs for New Mexico counties are not available in the same detail as Texas Counties. So we assume that all three areas are very

				close in terms of temperature, humidity and barometric pressure and utilize only El Paso County information. Therefore, only the values for the El Paso County is listed in the tables and as a result El Paso County emission rates are being applied to Doña Ana Area and Otero County, New Mexico.
21	25	Table 18	Please clarify intent of footnote 1, concerning El Paso being the only county modeled for emissions rates	The conformity emissions analysis includes El Paso County, Doña Ana Area and Otero County, New Mexico. However, since the modeling inputs for New Mexico counties are not available in the same detail as Texas Counties. So we assume that all three areas are very close in terms of temperature, humidity and barometric pressure and utilize only El Paso County information. Therefore, only the values for the El Paso County is listed in the tables and as a result El Paso County emission rates are being applied to Doña Ana Area and Otero County, New Mexico.
22	26	Table 19	Please clarify basis for "I/M Program ID" and "Pollutant Process ID" reflecting "N/A" for each of the "Test Standards".	Modified to add values to provide clarity
23	26	Table 19	Please clarify basis for refence to 1995 for the "End Model Year" for the Two-Mode, 2500 RPM/Idle Test and Evaporative Gas Cap Check "Test Standards".	Added reference to provide clarity