

## Response to Comments on Transportation Conformity PM10 Hot Spot Analysis (Revised August 17, 2011)

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### Comment 1:

I was part of the original group that proposed to Transmountain Road Project. I was hired by El Paso County in 1959 to head the Transmountain Road Project. I worked under County Judge Woodrow Bean. I organized and led the El Paso delegation before the Texas Highway Department (now TxDOT).

The project was conceived to unite East and West El Paso. There are only a few East-West thru streets in El Paso confirmed between Scenic Drive and the border. The conception has always been a limited access expressway facility. A muted project will severely impact project efficiency and create collateral expense and environmental impacts. I was chairman of the initial open space committee in El Paso and it obvious that the project as currently envisioned by TxDOT will have the most favorable economic and environmental impacts on our community.

Tom Diamond  
Attorney At Law, P.E. (Inactive)

Response to Comment 1: *Comment noted.*

### Comment 2:

I'm writing to you in regards to the announcement in the June 15, 2011 El Paso Times regarding public comment on the need for a PM 10 Hot Spot Analysis.

I do not think this area should be excluded. Although 124,000 trips is a guideline, this is not a hard number or reason to exclude. In fact at several presentations we were told the increase to the highway was needed to handle the significant increase in truck traffic.

Further the TIA performed by Walter P Moore for the city of El Paso shows service levels at all intersections in the project will be degraded to service level F within 12 years.

The significant percent increase in trips as well as the service level degradation as direct result of the proposed 375 expansion would require a PM 10 Hot Spot analysis be performed.

Thank you.

Rick Bonart  
[rickbonart@earthlink.net](mailto:rickbonart@earthlink.net)  
EarthLink Revolves Around You.

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Response 2: The basis for the decision that a project is not one of local air quality concern under 40 CFR 93.123(b)(1) and is, therefore, not subject to a PM10 qualitative or quantitative hot spot analysis under 40 CFR 93.116 is as follows. The guidance under 40 CFR 93.123(b)(1)(i) states that projects that are of air quality concern need to show high traffic levels (125,000 ADT or more) and have a percentage of trucks of 8% or higher. Additionally, 40 CFR 93.123(b)(1)(ii) states that intersections along the corridor have to meet two (2) criteria to be of air quality concern: have an estimated level of service (LOS) D or worse, AND have a significant increase in the number of diesel trucks circulating through the intersection.

Based on the above, TxDOT prepared the information for the Loop 375 (Transmountain project), which is presented in Tables 1 and 2.

**Table 1. Summary of Corridor Traffic Data**

	2015		2035	
	ADT	% truck	ADT	% truck
Transborder 2035 MTP-based	40,000	5.3	71,000	5.3
Revised Mission 2035 TDM	22,100	4.2	33,200	4.2

**Table 2. Summary of Peak-Hour Conditions**

Study Intersection	2007			2035 (Mission Model)			2035 (TransBorder Model)		
	PM Peak Hour			PM Peak Hour			PM Peak Hour		
	LOS	Intersection Delay (sec/veh)	Queue Length (Feet)	LOS	Intersection Delay (sec/veh)	Queue Length (Feet)	LOS	Intersection Delay (sec/veh)	Queue Length (Feet)
<b>Signalized Intersections</b>									
North Desert Blvd at LP 375 (Transmountain Rd)	C	30.6		C	22.3		E	72.1	
South Desert Blvd at LP 375 (Transmountain Rd)	C	23.9		C	25.0		F	84.7	
Northwestern Dr at LP 375 Eastbound Frontage Rd				A	9.6		B	17.2	
Northwestern Dr at LP 375 Westbound Frontage Rd				A	9.0		B	15.3	
Resler Dr at LP 375 Eastbound Frontage Rd				B	11.2		C	24.3	
Resler Dr at LP 375 Westbound Frontage Rd				B	10.1		C	23.7	
Plexxar Dr at LP 375 Eastbound Frontage Rd				B	16.0		B	16.5	
Plexxar Dr at LP 375 Westbound Frontage Rd				B	14.7		B	15.7	
Paseo Del Norte Rd at LP 375 Eastbound Frontage Rd				B	17.6		C	20.9	
Paseo Del Norte Rd at LP 375 Westbound Frontage Rd				B	14.5		B	16.4	
<b>Unsignalized Intersections (LOS, Delay and Queues are for Minor Movements)</b>									
Northwestern Dr at LP 375 (NBL/NBR)	E/C	48.1/19.6	47/42						
Resler Dr at LP 375 (NBL/NBR)	F/F	662.9/73.2	217/250						
FMSP Entrance at LP 375 (SBL/SBR)	D/D	32.5/32.5	2-Feb	F/F	503.5/503.5	158/158	F/F	n/a	n/a
<b>FMSP Entrance - Alternative Configuration Analysis (LOS, Delay and Queues are for Minor Movements)</b>									
FMSP Entrance at LP 375 (SBR) - Alternative*				C	19.2	18	F	66.1	55.0

\*FMSP Entrance Revised Configuration: Entrance right-in and left-in; exit right-out only.

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This information was presented to the Consultation Partners for the El Paso MPO region, which is made up of transportation planning and air quality professionals from various locals, state and federal agencies, including the U.S. Environmental Protection Agency (EPA), the Federal Highway Administration (FHWA), the Texas Commission on Environmental Quality (TCEQ), TxDOT, and the El Paso MPO, in conference calls held on June 6, 2011 and August 15, 2011.

In all instances, ADT is lower than 125,000 and truck volumes are lower than 8%. Furthermore, the data related to LOS along the corridor show that most intersections operate at acceptable levels of service under current and forecast conditions, and also have a low number of diesel powered vehicles circulating through them. Given this information, the Consultative Partners concurred that the Loop 375 (Transmountain Road) project is not one that would be covered under 40 CFR 93.123(b)(1)(i) or (ii), and therefore, does not require a PM-10 hot-spot analysis.

Regarding your concern related to the study that the City of El Paso commissioned Walter P. Moore to perform, TxDOT cannot comment because it was not performed for this agency. However, to respond to your concern about intersections, the data in Table 2 above show that under the revised Mission 2035 TDM scenario, all intersections along the Loop 375 (Transmountain Road) corridor will operate under acceptable LOS in 2035 under the preferred alternative, with the exception of the entrance to the Franklin Mountain State Park. Under the Transborder 2035 MTP-based scenario, North/South Desert Blvd. intersections, as well as the entrance to the Franklin Mountain State Park entrance, operate at LOS E and F. As explained above, these conditions by themselves do not warrant a hot-spot analysis for the project since there is not a high number of diesel powered vehicles circulating through them.

Regarding the Franklin Mountain State Park entrance, Table 2 shows that it will operate at LOS F in 2035 under both scenarios. This is due to the fact that, under the original design, this intersection remains unsignalized. According to Highway Capacity Manual (HCM) 2000 edition procedures, unsignalized intersections report the delay of movements that must stop and wait until a sufficient gap is available for them to proceed. Even though there are very few vehicles waiting in queue to move through the intersection, these vehicles experience a longer delay to proceed, especially when making the left turn movements. However, as a response to comments from the public and other agencies, TxDOT has revised the design of the park entrance so that the left turn movement to exit the park is not allowed. This modification improves the operation of the intersection to LOS C. Additionally, by reducing the number of vehicle-to-vehicle and vehicle-to-pedestrian conflict points, safety of this intersection is also improved.

TxDOT has committed to further improve the intersection of Loop 375 at the State Park entrance with a separate project to be implemented in the short future. This commitment is documented in the Errata Sheet of the Environmental Assessment that is being reviewed by FHWA.