

February 1, 2019

Amy Vennewitz
Assistant Director
Metropolitan Council
390 Robert Street North
St. Paul, MN 55101-1805

RE: Draft 2040 Transportation Policy Plan Amendment to Add METRO Gold Line and Interstate 94 Lanes Addition Projects

Dear Amy Vennewitz:

The Minnesota Pollution Control Agency (MPCA) has completed its formal review of the draft 2040 Transportation Policy Plan (TPP) Amendment request for an extension and station addition for the METRO Gold Line, and lane addition to the Interstate (I)-94 from Dayton Parkway to Minnesota Trunk Highway (TH) 101. Both projects were previously approved and included in the current TPP. The METRO Gold Line is included as a transitway project from Woodbury to downtown Saint Paul while the I-94 is a major pavement preservation project. This draft amendment to the 2040 TPP is proposed for review and recommendation for public comment.

The Minnesota Interagency Air Quality Conformity Consultation Committee with representatives from the MPCA, Metropolitan Council (Council), Minnesota Department of Transportation (MnDOT), Federal Highway Administration (FHWA), and the U.S. Environmental Protection Agency (EPA) were consulted during the preparation of the TPP amendment. Several ongoing communications also occurred with periodic meetings, draft reports, emails, and phone calls.

The METRO Gold Line is currently in the Federal Transit Administration's project development phase and was the locally preferred alternative (LPA). The LPA was subsequently revised to shift the project from terminating in Lake Elmo to Woodbury when the TPP was updated in October 2018. Ongoing corridor work related to early design of the project resulted in a recommendation for a short extension of the project in Woodbury to a new station and terminus at a surface park and ride along I-494. The METRO Gold Line is expected to go in to operation in 2024.

For the I-94 project, it was concluded during the project development process and Environmental Assessment that adding lanes along I-94 from Dayton Parkway to TH 101 would also be cost effective. Additionally, this project will create the infrastructure needed to convert the lanes to MNPASS if needed in the future. The project is anticipated to begin construction before the end of 2019.

The MPCA staff has examined the draft Transportation Improvement Program (TIP) for conformance with a checklist of requirements from the joint Transportation Conformity Rule (Rule) of the EPA and the U.S. Department of Transportation. The intent of the Rule is to ensure compliance with the Clean Air Act Amendments of 1990 and the new transportation reauthorization bill "Fixing America's Surface Transportation Act" (FAST Act) when a Metropolitan Planning Organization (MPO) or state department of transportation serves as a distribution agency for federal transportation funds.

The Rule requires that the MPOs base their TIPs and long-range comprehensive Transportation Plans on the latest planning assumptions. As a result, the draft TPP's air quality conformity analysis is based on the most current Council socioeconomic data used in Thrive MSP 2040, which was adopted by the Council on May 28, 2014. The planning document provides the Council with the socioeconomic data (planning assumptions) to develop long-range forecasts of regional highway and transit facilities' needs.

On November 8, 2010, the EPA approved a Limited Maintenance Plan request for the Twin Cities maintenance area. Under a Limited Maintenance Plan, the EPA has determined that there is no requirement to project emissions over the maintenance period and that "an emission budget may be treated as essentially not constraining for the length of the maintenance period". The reason is that it is unreasonable to expect that the Twin Cities maintenance area will experience so much growth within this period that a violation of carbon monoxide (CO) National Ambient Air Quality Standard (NAAQS) would result. Therefore, no regional modeling analysis is required, however federally funded projects are still subject to "hot spot" analysis requirements. The limited maintenance plan adopted in 2010 determines that the level of CO emissions and resulting ambient concentrations will continue to demonstrate attainment of the CO NAAQS.

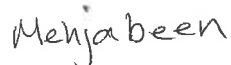
The current TPP was also prepared in accordance with the public participation plan for transportation planning adopted by the Council on July 26, 2017. This process satisfies FAST Act requirements for public participation involvement, as well as the public consultation procedures requirements of the Rule.

Based on this review, the analysis described in the proposed 2040 TPP Amendment #2, and submitted by the Council has resulted in a Conformity Determination that METRO Gold Line and I-94 lanes addition projects included in the draft 2040 TPP meet all relevant regional emissions analysis and budget tests as described therein. The draft 2040 TPP also conforms to the relevant sections of the Federal Conformity Rule and the applicable sections of the Minnesota State Implementation Plan for air quality.

The MPCA staff appreciates the opportunity given to review this document as part of the EPA Rule consultation process. The MPCA staff also appreciates the cooperation of the interagency consultation group that includes the Council, EPA, MnDOT, and FHWA for their immediate assistance in resolving all policy and technical analysis issues with respect to the projects' air quality classification and their willingness to accept the suggested course of action.

Please contact me if you have any questions at 651-757-2191 or via email at mehjabeen.rahman@state.mn.us.

Sincerely,



Mehjabeen Rahman
Mobile Source Specialist
Community and Business Sustainability Unit
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MR:ds

cc: See next page.

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