

May 27, 2020

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

RE: Draft 2021-2024 Transportation Improvement Program

Dear Amy Vennewitz:

The Minnesota Pollution Control Agency (MPCA) staff has completed its formal review of the draft 2021-2024 Transportation Improvement Program (TIP). The MPCA staff has examined the draft TIP for conformance with a checklist of requirements from the joint Transportation Conformity Rule (Rule) of the U.S. Environmental Protection Agency (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 (Plan) on the latest planning assumptions. As a result, the draft TIP's air quality conformity analysis is based on the most current Metropolitan Council (the Council) socioeconomic data used in Thrive MSP 2040, which was adopted by the Council on May 28, 2014. The latest update to these forecasts was published in December 2019. The planning document provides the Council with the socioeconomic data (planning assumptions) to develop long-range forecasts of regional highway and transit facility needs.

The Minneapolis-St. Paul region is within an EPA-designated attainment area for carbon monoxide (CO). The region completed the 20-year maintenance period on November 29, 2019. This date marked 20 years from the effective date of redesignation of the area to attainment for CO National Ambient Air Quality Standard. However, a small portion of the region, mapped in Appendix B-9 is designated as a maintenance area for coarse particulate matter (PM10). The term "maintenance" reflects the fact that PM10 emissions in this area were unacceptably high in the past and subsequently were brought under control. A 20-year maintenance plan was approved by the EPA on September 24, 2002, and will expire on September 24, 2022, at that point, the entire region will be in attainment for transportation-related pollutants regulated by the Clean Air Act. No regional modeling analysis is required, however, federally funded projects are still subject to "hot spot" analysis requirements.

The current TIP 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 Conformity Rule. Based on this review, the analysis described in the conformity Appendix B and submitted by the Council, the MPCA concurs with the conformity determination that the projects included in the draft 2021-2024 TIP meet all relevant conformity emissions analysis and budget tests as described therein. The 2021-2024 TIP 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 Transportation Conformity Rule consultation process. The MPCA staff also appreciates the cooperation of the interagency consultation group that includes the Council, EPA, Minnesota Department of Transportation (MnDOT), and Federal Highway Administration (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 651-757-2347 or innocent.eyoh@state.mn.us.

Sincerely,

Innocent Eyoh

This document has been electronically signed.

Innocent Eyoh
Planner Principal
Environmental Analysis and Outcomes Division

IE:ds

cc: Andrew Emanuele, FHWA
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