



Minnesota Pollution Control Agency

520 Lafayette Road North | St. Paul, Minnesota 55155-4194 | 651-296-6300

800-657-3864 | 651-282-5332 TTY | www.pca.state.mn.us | Equal Opportunity Employer

May 13, 2014

Ms. Amy Vennewitz
Deputy Director
Metropolitan Transportation Services
Metropolitan Council
390 North Robert Street
St. Paul, Minnesota 55101

RE: Air Quality Conformity Analysis for the 2014 Metropolitan Council 2030 Transportation Policy Plan Amendment Request

Dear Ms. Vennewitz:

The Minnesota Pollution Control Agency (MPCA) has completed its review of the above-reverenced document submitted by the Metropolitan Council (Council) in support of its 2014 amendment of the 2030 Transportation Policy Plan (Plan). The Minnesota Interagency Air Quality Conformity Consultation Committee, with representatives from the MPCA, Council, Minnesota Department of Transportation (MnDOT), Federal Highway Administration (FHWA), and the U.S. Environmental Protection Agency (EPA), was consulted during the preparation of the Plan amendment. It conducted a conformity review of the projects and their documentation. Several ongoing communications occurred along with periodic meetings, draft reports, e-mails, and phone calls.

The current Plan was approved by FHWA on September 27, 2013. The requested plan amendment will include the construction of the following projects:

- Interstate (I)-494: construction of an additional general purpose lane from Trunk Highway (TH) 55 to the I-94/I-694 interchange, construction of auxiliary lane between TH 55 and CR 6, construction of northbound auxiliary lane from I-394 to Carlson Parkway
- I-694: construction of an additional lane from east of Rice Street to Lexington Avenue

As part of this Plan update, the Council has revised the Conformity Documentation referenced as Appendix F in the Plan. Appendix F provides the basis for meeting carbon monoxide (CO) standards. This revision involved the reviewing and selection of projects exempted from conformity air quality analysis and regionally significant projects that must be included in the conformity analysis of the plan for Action Years 2015, 2020, and 2030. The analysis included the projects listed in Tables F-1 through F-3.

On November 8, 2010, the EPA approved a Limited Maintenance Plan 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 emissions budget may be treated as essentially not constraining for the length of the maintenance period." The EPA made this determination because it is unreasonable to expect that the Twin Cities maintenance area would experience so much growth in that period that a violation of the CO National Ambient Air Quality Standards would result. No regional modeling analysis is required; however, federally-funded projects are still subject to "hot spot" analysis requirements.

Ms. Amy Vennewitz

Page 2

May 13, 2014

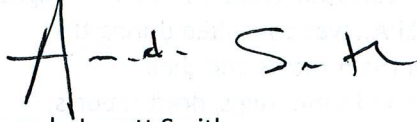
I have examined the document for conformity with a checklist of requirements from the joint Federal Transportation Conformity Rule of the EPA and the U.S. Department of Transportation. Based on this information, the MPCA has determined that the projects included in the 2014 Plan amendment meet all relevant regional emissions analysis and budget tests as required by the Conformity Rule.

Therefore, the 2014 Plan amendment fully meets and conforms to the relevant sections of the Federal Transportation Conformity Rule and to the applicable sections of the Minnesota State Implementation Plan for Air Quality.

The MPCA appreciates the opportunity given to review this document as part of the EPA's Transportation Conformity Rule consultation process, and for the great work done by the Council's staff in completing this analysis in a timely fashion. The MPCA also appreciates the cooperation of the interagency consultation group with their immediate assistance in resolving all policy and technical issues with respect to the Plan's Air Quality Conformity determination.

If you have any questions, please contact me at 651-757-2486 or by e-mail at amanda.smith@state.mn.us.

Sincerely,

A handwritten signature in black ink that reads "Amanda Smith". The signature is written in a cursive style with a large initial "A" and "S".

Amanda Jarrett Smith
Air Policy Planner
Environmental Analysis & Outcomes Division

AJS:je

cc: Jonathan Ehrlich, Metropolitan Council
Brian Isaacson, MnDOT
Susan Moe, FHWA
Michael Leslie, EPA
Patricia Bursaw, MnDOT and TAC Chair
Karl Keel, City of Bloomington, F&P Chair
Bobbi Retzlaff, MnDOT
J. David Thornton, MPCA
Shannon Lotthammer, MPCA
Frank Kohlasch, MPCA
Mary Jean Fenske, MPCA
Innocent Eyoh, MPCA