



Minnesota Pollution Control Agency

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December 8, 2008

Ms. Arlene McCarthy
Metropolitan Transportation Services
Metropolitan Council
390 North Robert Street
St. Paul, MN 55101

**RE: Air Quality Conformity Analysis for the 2030 Transportation Policy Plan
Modification**

Dear Ms. McCarthy:

I have completed my review of the above referenced document submitted by the Metropolitan Council (Council) in support of its 2008 modification of the 2030 Transportation Policy Plan (Plan). The Minnesota Interagency Air Quality Conformity Consultation Committee, with representatives from the Minnesota Pollution Control Agency (MPCA), Council, Minnesota Department of Transportation (MNDOT), and Federal Highway Administration (FHWA) met on November 25, 2008, to discuss the proposed changes to the draft 2008 Plan in response to potential economic stimulus legislation targeting transportation infrastructure. Only one of the eleven projects selected from the Plan may be constructed with a decision to be made on a later date depending on the size of the stimulus package and other considerations.

At this meeting, the committee directed the Council staff to analyze these eleven projects individually. As part of this plan modification, the Council prepared a quantitative analysis of carbon monoxide (CO) emissions resulting from the addition of each of the eleven projects. Each project was added to the baseline network and modeled for years 2015, 2020, and 2030. (No modeling was performed for 2009, since all of the modeled projects would be constructed after that date). The regional model highway assignment was run, and the results were combined with MOBILE 6.2 emissions rates to produce tons-per-day estimates of CO emissions for each scenario. I have examined the document for conformance with a check list of requirements from the joint Transportation Conformity Rule of the U.S. Environmental Protection Agency (EPA) and the U.S. Department of Transportation.

The analysis in the document shows that daily CO emissions in tons/day for the milestone years of 2015, 2020, and 2030 are below the regional CO motor vehicle emissions budget revised by the MPCA in 2005 even with the addition of any one of the projects listed in Table I of the document submitted by the Council. Based on this information, the MPCA has determined that the addition of any one of the projects listed in Table 1 of the conformity document meet all relevant regional emissions analysis and budget tests as described herein. Therefore, the 2008 Plan modification conforms to the relevant sections of the federal transportation



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Conformity rule and to the applicable sections of the Minnesota State Implementation Plan for Air Quality.

I appreciate the opportunity given to review this document as part of the EPA Transportation Conformity rule consultation process, and for the great work done by the Council's staff by completing this analysis in a timely fashion. I also appreciate 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 651-757-2347 or via e-mail at innocent.eyoh@pca.state.mn.us.

*MPCA is in the middle of changing phone services and phone numbers, my new number is 651-757-2347. You may still reach me from my old number until December 15.

Sincerely,

Innocent E. Eyoh
Principal Transportation Planner

- cc: Jonathan Ehrlich, Met Council
- Patricia Bursaw, MNDOT
- Brian Isaacson, MNDOT
- Susan Moe, FHWA
- Michael Leslie, EPA
- J. David Thornton, MPCA
- John Seltz, MPCA
- Frank Kohlasch, MPCA

IE:rlr