

Appendix N

Mobile Source Air Toxins Memo



Memorandum

DATE: June 12, 2014

TO: Jon Barber, Highway Environmental Program Manager, Planning and Project Development

FROM: Will Packard, Highway Environmental Specialist, Planning and Project Development

SUBJECT: Mobile Source Air Toxins (MSATs) discussion for the NDOR project L62A to Alliance (C.N. 51432) in Morrill County and Box Butte County, NE

Overview

The purpose of this memo is to provide a qualitative assessment of the effects the L62A to Alliance projects will have on MSATs in the area. For consideration of MSAT in NEPA documents, FHWA developed three categories for analysis depending on project circumstances. L62A to Alliance project is categorized as level 2 or "projects with low potential MSAT effects" resulting in the need for this qualitative assessment. The project it is not anticipated to create a potential for meaningful differences in MSAT emissions for the following reasons:

- This project will not serve any intermodal facilities.
- The projected design year traffic will not reach 140,000 ADT.
- There will be no significant increase in vehicle miles traveled.

MSAT Discussion

The two alternatives analyzed for the purpose of MSAT are the 2040 Build and No-Build Alternatives. The amount of MSAT emitted would be proportional to the vehicle miles traveled, or VMT, assuming that other variables such as fleet mix are the same for each alternative. The 2040 VMT for L62A to Alliance would be 116,780 for the build scenario and 94,870 for the no build scenario. This is an increase of approximately 23% between the No-build and Build alternatives. Regardless of the the increase in VMT, emissions will likely be lower than present levels in the design year as a result of EPA's national control programs that are projected to reduce annual MSAT emissions by over 80 percent between 2010 and 2050. Local conditions may differ from these national projections in terms of fleet mix and turnover, VMT growth rates, and local control measures. However, the magnitude of the EPA-projected reductions is so great (even after accounting for VMT growth) that MSAT emissions in the study area are likely to be lower in the future.

Sincerely,

A handwritten signature in black ink that reads "Will Packard".

Name

6/12/14

Date

Will Packard
Environmental Specialist
Nebraska Dept. of Roads