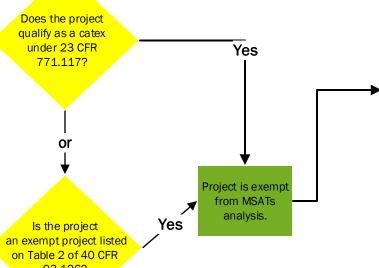
## MDT Project Level MSAT Flow



NOTE: This flowchart follows and refers to FHWA's "Updated Interim" Guidance Update on Air Toxic Analysis in NEPA Documents," FHWA, October 2016.



Yes

For projects that are categorically excluded under 23 CFR 771.117, or are exempt from conformity requirements under the Clean Air Act pursuant to 40 CFR 93.126, no analysis or discussion of MSAT is necessary. Documentation sufficient to demonstrate that

the project qualifies as a categorical exclusion and/or exempt project will suffice.

93.126?

Will the project produce no meaningful potential MSAT effects?

No

No

No MSAT analysis is required, regardless of the class of NEPA document. However, the project record should document the basis for the determination of "no meaningful potential impacts" with a brief description of the factors considered. Example language, which must be modified to correspond with local and projectspecific circumstances, is provided in Appendix A of FHWA's "Updated Interim Guidance Update on Air Toxic Analysis in NEPA Documents," FHWA, October 2016

Project may be one of Low or High Potential for MSAT Effects. For the rest of this analysis, the ISA form is not adequate, and the Analyst will need to complete a Technical Memorandum or Report on Air Quality.

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## MDT Project Level MSAT Flow

Will the project produce low potential MSAT effects?
These projects serve to improve operations of highway, transit or freight without adding substantial new capacity or without creating a facility that is likely to meaningfully increase emissions or exposure to MSAT emissions of sensitive populations or land uses.

−Yes

For these projects, a qualitative assessment of emissions projections should be conducted. This qualitative assessment would compare the expected effect of the project on traffic volumes, vehicle mix, or routing of traffic, and the associated changes in MSATs for the project alternatives, based on VMT, vehicle mix, and speed. Appendix B includes prototype language for a qualitative assessment. It would also discuss national trend data projecting substantial overall reductions in emissions due to stricter engine and fuel regulations issued by the U.S. EPA. In addition, quantitative emissions analysis of these types of projects will not yield credible results that are useful to project-level decision-making due to the limited capabilities of the transportation and emissions forecasting tools. In addition to the qualitative assessment, a NEPA document for this category of projects must include a discussion of information that is incomplete or unavailable for a project specific assessment of MSAT impacts, in compliance with CEQ regulations (40 CFR 1502.22(b)) regarding incomplete or unavailable information. This discussion would explain how air toxics analysis is an emerging field and current scientific techniques, tools, and data are not sufficient to accurately estimate human health impacts that would result from a transportation project in a way that would be useful to decision-makers. Also in compliance with 40 CFR 1502.22(b), it should contain a summary of current studies regarding the health impacts of MSATs. Prototype language for this discussion is contained in Appendix C.

Contact your FHWA Environmental Coordinator for assistance in developing a specific approach for assessing impacts. This approach would include a quantitative analysis that would attempt to measure the level of emissions for the U.S. EPA's priority MSATs for each alternative, to use as a basis of comparison. This analysis also may address the potential for cumulative impacts. where appropriate, based on local conditions. How and when cumulative impacts should be considered would be addressed as part of the assistance outlined above.

Projects with Higher Potential MSAT Effects

Does your project create or significantly alter a major intermodal freight facility that has the potential to concentrate high levels of diesel particulate matter in a single location, or does your project create new or add significant capacity to urban highways, such as interstates, urban arterials, or urban collector-distributor routes with traffic volumes where the AADT is projected to be 140,000-150,000 in any analysis year through the design year, and also proposed to be located in proximity to populated areas or in rural areas, in proximity to concentrations of vulnerable populations?

No