

Certification Review of the Metropolitan Transportation Planning Process for the St. Louis, MO-IL Transportation Management Area

Certification Review by:
Federal Highway Administration
Federal Transit Administration



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Executive Summary

Section 134 of Title 23 United States Code requires that the Federal Highway Administration and the Federal Transit Administration jointly review, at least every four years, the metropolitan transportation planning process for each urbanized area with a population of over 200,000 persons. The East-West Gateway Council of Governments is the designated Metropolitan Planning Organization for the St. Louis region and works with the Missouri and Illinois Departments of Transportation as well as the region's public transit operators to implement the federally required planning process.

The Federal review team's work consisted of reviewing the products of the planning process, reviewing the ongoing oversight activities conducted by the FHWA and the FTA, and an on-site review conducted September 16-18, 2008 where discussions were held with the members of the planning process. In addition to assessing the progress in addressing recommendations from the last certification review in 2004, the on-site review focused on compliance with current transportation law, planning regulations, current issues, best practices, and opportunities to enhance the planning process. This final report summarizes the various discussions from the site visit, provides a series of review findings, and highlights noteworthy practices and significant improvements in the planning process in a number of areas.

Based on this review and ongoing oversight by the Federal Highway Administration and the Federal Transit Administration, the transportation planning process carried out in the St. Louis, MO-IL Transportation Management Area is certified as meeting the requirements as described in 23 CFR Part 450. A number of recommendations have been made throughout this report for enhancement of the planning process carried out in this region.

Introduction

Background and Purpose of the Review

As a condition for receipt of Federal funds for planning, capital, or operating assistance, 23 CFR Part 450 and 49 CFR Part 613 require that each Transportation Management Area (TMA) have a continuing, cooperative, and comprehensive (3C) transportation planning process that results in plans and programs consistent with the planned development of the metropolitan area. A TMA is an urbanized area, as defined by the U.S. Census, with a population of over 200,000 persons. Pursuant to 23 U.S.C. 134(i)(5) and 49 U.S.C. 1607, the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) must jointly certify the metropolitan transportation planning process in TMAs at least every four years. The East-West Gateway Council of Governments (EWGCOG) is the federally designated Metropolitan Planning Organization (MPO) for the St. Louis, MO-IL TMA.

The purpose of the review is to determine if the planning process can be certified as satisfying the requirements in the metropolitan planning regulations (23 CFR 450). This review had the following objectives:

1. Verify that the metropolitan planning process is certified as being in compliance with current transportation planning law.
2. Determine if the metropolitan transportation planning activities are being carried out in accordance with the governing metropolitan planning regulations, policies, and procedures.
3. Determine if the metropolitan transportation planning process is a continuing, cooperative, and comprehensive process that results in the support and development of transportation improvements for the overall St. Louis metropolitan area.
4. Determine if the metropolitan transportation planning process provides adequate representation and input from all levels of local government and individual interest groups in addressing the transportation needs of the metropolitan area.
5. Enhance the metropolitan planning process and improve the quality of transportation investment decisions.
6. Identify noteworthy practices, which can be shared with other states, metropolitan planning organizations, and transit operators.

Review Approach and Federal Team Membership

In general, TMA certification reviews consist of three primary activities: a site visit, review of planning products (in advance of and during the site visit), and preparation of a report that summarizes the review and offers findings. These reviews focus on compliance with Federal regulations, challenges, successes, and experiences of the cooperative relationship between the MPO, State Department of Transportation, and transit operators in conducting the metropolitan planning process. Joint FTA/FHWA certification review guidelines provide field reviewers with latitude and flexibility to tailor the review to reflect local issues and needs. Consequently, the scope and depth of certification review reports will vary significantly.

The certification review process is only one of several methods used to assess the quality of a local metropolitan planning process, compliance with applicable statutes and regulations, and the level and type of technical assistance needed to enhance the effectiveness of the planning process. Other activities provide both FHWA and FTA an opportunity to comment on the planning process, including the Unified Planning Work Program approval, Long Range Transportation Plan, Metropolitan and Statewide Transportation Improvement Program findings, as well as a range of other formal and less formal contacts. While this review report itself may not fully document those many intermediate and ongoing checkpoints, the “finding” of the certification review is based upon the cumulative findings of the entire review effort.

The review process is individually tailored to focus on topics of significance in each metropolitan planning area. Federal reviewers prepare certification reports to document the results of the review process. The reports and final actions are the joint responsibility of the appropriate FHWA and FTA field offices and content will vary to reflect the planning process reviewed, whether or not they relate explicitly to formal findings of the review. The Federal Review Team was composed of the following ten individuals:

Joni Roeseler, FTA Region VII, Planning and Program Development Team Leader
Reggie Arkell, FTA Region V, Community Planner
Brad McMahon, FHWA Missouri Division, Trans. Specialist/Planning Program Team Leader
Donny Hamilton, FHWA Missouri Division, Transportation Planning Engineer
Kirk Boyer, FHWA Missouri Division, Transportation Finance Manager
Sandy Moeller, FHWA Missouri Division, Financial Specialist
Ed Frazier, FHWA Missouri Division, Civil Rights Specialist
John Donovan, FHWA Illinois Division, Transportation Planning Specialist
Chris DiPalma, FHWA Illinois Division, Trans. Management/System Operations Engineer
Heather Hamilton, U.S. EPA Region VII, Air Quality Specialist

Federal Legislation

On August 10, 2005, the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU) was signed into law. SAFETEA-LU authorizes the Federal surface transportation programs for highways and transit for the 5-year period from 2005-2009. SAFETEA-LU built on previous legislative efforts, provided new emphasis on certain initiatives, and identified new programs to improve safety, mobility, and environmental stewardship. SAFETEA-LU also mandated that MPOs implement changes to metropolitan planning requirements by July 1, 2007. This is the first certification review of the St. Louis, MO-IL TMA under SAFETEA-LU regulations.

The upcoming expiration of SAFETEA-LU highlights numerous challenges facing the transportation industry. Among these are enhancing mobility and reducing congestion in America’s transportation system, preventing catastrophic failures and obsolescence in the nation’s aging surface transportation infrastructure, and deploying and enhancing programs for reducing the severity and frequency of crashes. In addition to these issues, the nation is at a crossroads needing to develop plans and implement strategies to address potentially crippling projected highway and transit funding shortfalls. As such, this planning certification review is conducted within the context of seeking to maximize the return on infrastructure investments.

Input from the Public, Officials, and Member Agencies Staffs

Providing opportunities for public participation is an essential cornerstone of the transportation planning process defined in Title 23 and Title 49. State DOTs, Metropolitan Planning Organizations, and transit operators are required to provide for public input and to consider the public's views when making decisions on the use of federal funding assistance. With the passage of the Transportation Equity Act for the 21st Century (TEA-21) in 1998, a public involvement component was statutorily mandated for the TMA certification review process.

Three public meetings were conducted as part of the certification review site visit including the regularly scheduled EWGCOG Executive Advisory Committee, the regularly scheduled St. Louis Air Quality Advisory Committee, and a stand alone public meeting on the evening of September 16, 2008. An attendance sheet containing the names of attendees at these hearings is contained in the appendices of this report. A presentation of the finding of this review will be made to the EWGCOG Board of Directors after the public release of this review report.

The majority of the site visit consisted of discussions with staff from EWGCOG, MoDOT, IDOT, and Metro. These agencies receive federal funds and are required to comply with federal planning laws and regulations. These agencies answered questions regarding specific requirements in the law. Attendance sheets containing the names of participating staff are contained in the appendices of this report.

As part of the certification review site visit, a roundtable discussion among the planning partners was held on September 18, 2008 under the title of "The Future of Transportation" and was lead by Vice Admiral Thomas J. Barrett, the Deputy Secretary of the United States Department of Transportation. Deputy Secretary Barrett discussed earmarking federal funding, the need to refocus the federal role, private investment in transportation, the need to be more transparent in decision making, performance based decision making, and preservation of existing resources. Local interests were predominately articulated by Mr. Les Sterman, EWGCOG Executive Director, who discussed the impacts of earmarks, the lessons learned through the New Mississippi River Bridge, the difficulty of reaching freight constituencies, the need for broad public discussion for initiatives such as the I-70 Corridors of the Future project, and the role of the MPO relative to ultimate decision making authority in large, complex regions.

Process Review Findings

It is important to understand the specific meaning for terms that specify the outcome of the certification review. These terms are defined as follows:

Key Definitions:

Corrective Actions: Those items that fail to meet the requirements of the Federal regulations seriously impacting the outcome of the overall process.

Recommendations: Items while somewhat less substantial and not requiring action but are still significant enough that FHWA and FTA are hopeful that the State and local officials will consider taking some action. Typically the recommendations involve the state of the practice instead of regulatory requirements.

Commendations - Noteworthy Practices: Elements that demonstrate well thought out procedure for implementing the planning requirements. Elements that address items that have been difficult nationwide could be cited as noteworthy practice.

A. FINDING

It is the conclusion of the Federal Review Team that the St. Louis, MO-IL TMA has a planning process consistent with the federal planning requirements in 23 U.S.C. 134(i)(5) and 49 U.S.C. 1607. Based on the information in this review and the ongoing federal oversight of the planning activities in the St. Louis, MO-IL TMA, FHWA and FTA jointly act to certify the transportation planning process of this region.

B. COMMENDATIONS - NOTEWORTHY PRACTICES

The Federal Review Team wishes to acknowledge the considerable amount of outstanding planning being conducted in the St. Louis region.

1. EWG initiatives for environmental mitigation and consultation are outstanding and should be considered national best practices for SAFETEA-LU implementation. Included in these efforts are consultation initiatives with federal, state, and local resource agencies within the context of the update to the LRTP, *Legacy 2035*.
2. EWG is commended for the creation of the Research Services Department and is encouraged to continue investing in quality, data-driven analysis on the myriad of issues impacting quality of life throughout the region.
3. Visualization techniques have been utilized well within the planning process and specifically, the Great Streets digital planning guide deserves considerable praise.
4. EWG is commended for its staff's efforts to facilitate cooperative decision making for the New Mississippi River Bridge.

5. EWGCOG is commended for their modeling effort locally known as the Gateway Blueprint Model that provides unique and valuable analysis for evaluating the social, economic, and environmental impacts of various transportation investment decisions.
6. EWGCOG is commended for hosting the US DOT Travel Model Improvement Program (TMIP) sponsored peer review of the TransEval model under development to ensure that the technical processes being employed met professional practice standards. The review panel, comprised of national experts, made various suggestions that have since been incorporated into the model. Panelists noted that they found EWGCOG modeling staff to be very skilled and EWGCOG senior management to have demonstrated strong interest in and support for improving modeling in the region.

C. CORRECTIVE ACTIONS

NONE

D. RECOMMENDATIONS

1. The MPO should provide leadership to the St. Louis, MO-IL TMA through improved regional cooperation for transportation policy and investment decisions. Although the EWGCOG structure provides opportunities for enhanced cooperation and coordination, there are currently few ways to mediate conflicts between divergent local or regional interests. Only through continued focus on collective goals and implementation of strategies advancing those goals will the region move beyond intraregional competition and better position itself to meet public policy challenges.

Improved cooperation and coordination between the States and the MPO should occur at many levels. EWGCOG should work with the State DOTs to develop schedules so that the MPO has the formal opportunity to proactively discuss regional priorities with the States prior to the development of State highway and transit programs. The State DOTs should also commit to providing the MPO anticipated funding amounts for upcoming planning funds (CPG, PL, 5303) and project implementation funds (STP-S, CMAQ) as early as feasible so that EWGCOG staff can properly prepare budget and administer various programs. Project level communication can also be improved by the States. For example, closer coordination between MoDOT and EWGCOG and its member agencies would be valuable during the development of the supplemental environmental impact statement related to the I-70 Corridors of the Future project. Likewise, IDOT has not fully engaged EWGCOG in previous corridor studies such as the Gateway Connector and the IL 159 feasibility study.

2. It is recommended that EWGCOG continue their leadership role by seeking opportunities to advance linkages between the transportation planning process and the NEPA process. Examples of transportation planning decisions and analyses that may be carried through to the project development and environmental review process include foundations for purpose and need statements, preliminary screening, evaluation and elimination of alternatives, planning level evaluation of indirect and cumulative effects, and regional or ecosystem level mitigation options and priorities.

3. EWGCOG should build on the Legacy 2035 freight focus group and actively recruit representatives of the rail and trucking freight community within the region to be active participants in the planning process. However in order to achieve success, representatives of the freight community will need to see the value of participating in regional metropolitan planning. An initial focus should be to identify and assess the freight bottlenecks in the region, in addition to identifying critical intermodal connectors within the region. From there, development of the intermodal freight investment plan needs to focus on setting regional priorities as well as presenting potential short term and long term solutions.
4. It is recommended that the next LRTP update and other planning efforts dedicate resources towards investigation of how transit is interrelated with land use and socio-economic conditions.
5. Given the historical challenges of funding transit in the St. Louis region and the current potential reduction in transit services resulting from the defeat of Proposition M, additional consideration should be given to transit systems recapturing funds through a surface transportation financial model in which system user charges directly support transit services. These user charges could relate more closely to the true marginal costs of congestion, construction, operation and maintenance and could include pricing techniques such as variable timing, VMT-based, and other user fees.
6. The Review Team provides the following recommendations below that are intended to enhance plan development as well as the effectiveness of plan implementation.
 - A. The next update of the LRTP should consider multiple population, household, and employment projections and their underlying assumptions in an effort to illustrate how the planning process evaluated and selected the preferred investment plan and forecasts. EWGCOG could use their technical capacity through the LEAM/Blueprint Model and other methods to analyze the costs and benefits under alternative scenarios for demographics, employment, and growth management. Results would demonstrate how different scenarios influence system efficiency and modal balance.
 - B. The next LRTP should include additional discussion on the methodology used to determine the projected transportation demand of persons and goods. Additionally, air quality conformity requirements call for the travel demand model to be reasonably sensitive to changes in the time(s), costs(s) and other factors affecting travel choices. Variables that could result in reduced demand under alternate scenarios including rising fuel costs, pricing schemes, and more efficient land use design/mix.
 - C. The next LRTP should enhance discussion of the management and operational strategies designed to improve the performance of existing transportation facilities in order to relieve vehicular congestion and maximize the mobility of people and goods. It is also recommended that the next LRTP update demonstrate that Transportation Control Measures (TCMs) have been considered to provide strategies both to reduce vehicle use and improve traffic flow. The LRTP should be transparent in how the aforementioned strategies are weighed, selected and implemented and should also

demonstrate how M&O strategies compliment and implement the Congestion Management Process.

- D. It is recommended that additional efforts are made to document the linkages between performance measures based upon the six focus areas (preservation, safety and security, congestion, access to opportunity, sustainable development, and goods movement) to the decision making process that results in the preferred investment plan. While it is apparent that these issues are significant considerations in program development and individual project selection, there is minimal documentation that assesses or quantifies the benefits and impacts of implementation of the investment plan. Beyond typical travel related measures, EWGCOG may also wish to consider analyzing the investment plan against quality of life measures such as per capita income/Wealth Index, Genuine Progress Indicator; Index of Social Health; Crime Index; Gross Regional Product, etc.
7. While the development of the Congestion Management Process (CMP) is expected to be completed in 2009, it is recommended that the CMP be developed and adopted at the latest prior to the 2010 update of the Transportation Improvement Program (TIP). The CMP should include regional definitions of congestion, identification of methods to monitor and evaluate system performance, a plan for data collection and performance monitoring, identification and evaluation of appropriate strategies, documentation of implementation plans for strategies, and establishment of a process for periodic assessment of implemented strategies. A robust CMP will provide a mechanism to enforce the MPO focus on system preservation and other regional goals by illustrating the benefits and costs of effective management and operation of the existing transportation network.

The CMP needs to document relevant performance measures to be able to monitor the effectiveness of implemented strategies. Measures should reflect both highway and transit modes with a preference towards mode-neutral measures (e.g. person throughput vs. vehicle miles traveled). Examples of potential performance measures are listed and described in the National Transportation Operations Coalition (NTOC) report titled *NTOC Performance Measurement Initiative* as well as US DOT draft guidebooks, *An Interim Guidebook on the CMP in Metropolitan Transportation Planning and Management and Operations in the Metropolitan Transportation Plan: A Guidebook for Creating an Objectives-Driven, Performance-Based Approach*. It is anticipated that the newly created EWG Research Department could be a valuable contributor towards development and monitoring of effective performance measurement data.

8. It is recommended that newly developed CMP performance measures be reflected in the LRTP and TIP and these measures should be used to establish a formal prioritization process that identifies how strategies are chosen and how they can be implemented as part of project programming processes throughout the region. MPO project selection criteria for STP-S, STP-E, and CMAQ funding should be updated to reflect information and strategies described in the CMP and member agencies should strive to program their regionally significant projects, regardless of funding source, according to accepted CMP strategies and priorities.

9. It is recommended that that the financial analysis in the EWG TIP includes:
 - A. The narrative demonstration of system level estimates of revenues and costs for local public agencies (LPAs) to adequately operate and maintain LPA owned federal-aid routes and public transportation systems. This documentation of O&M needs to be part of the next TIP update.
 - B. The documentation of the local revenue sources, anticipated to be available to implement LPA sponsored Federal-aid transportation projects, in TIP financial section. This documentation of local revenue sources to be part of the next TIP update.
10. It is recommended that each SDOT clearly define and consistently illustrate which projects will utilize the cash flow technique Advance Construction (AC) which allows states to initiate projects with state funds and later convert these projects to federal assistance. An AC project should be included in the TIP at two different points in time: (a) as State or local funds prior to the initial authorization of the AC project (including demonstration that adequate State funds are available to "front" the cost of the project) and (b) prior to the authorization of the project to convert it from AC to a Federal-aid funding program (including a demonstration from the State that this conversion maintains fiscal constraint with other Federal-aid projects). Therefore, in the year of an AC project's conversion, the amount of the project is considered as both a State revenue source and a Federal-aid debit.
11. Each State DOTs is expected to coordinate with EWG to devise a timeline that ensures the MPO an appropriate opportunity to review and comment on the respective state programming processes at an early enough stage to provide meaningful input prior to State submittal for inclusion into the TIP.
12. The MPO is not responsible for producing capital improvement programs of member agencies, but the MPO should strive to ensure that those programs are in concert with each other and advancing agreed upon priorities. Likewise, the MPO should be able to provide analysis to its members on the impacts that their independent capital improvement programs are having individually and collectively on system performance.

US DOT emphasizes that system-wide performance measures need to be further developed, refined, strengthened by improved data, and applied to the transportation planning process through the LRTP, TIP, CMP, and other products and processes. This information will provide a better understanding of how the existing system is operating and what effect future transportation investments will have on the overall regional network. Ultimately these performance measures should be incorporated into the accepted criteria for project selection by not only the MPO in allocation of STP-S, STP-E, and CMAQ funds, but by member agencies including the State DOTs and transit providers as meaningful criteria that helps drive their independent investment decisions.

13. It is recommended that the MPO re-evaluate the goals and process for producing the Annual List of Obligated Projects. This publication should be used as opportunity to document the successes of the planning and project development processes as well as demonstrating effective stewardship of federal funds.

14. The MPO should engage in discussion and closely monitor potential regulation of greenhouse gases for the purposes of mitigating the threats of climate change. While there may be general recognition of the threat that climate change poses to transportation infrastructure, it is understood that many of the potentially most effective GHG mitigation strategies (such as fuel efficiency, alternative fuels, and land use) are outside the direct influence of the MPO. The principle role of the MPO in the short term should be to begin the process of developing support from key partners on broadly accepted GHG reduction goals and strategies.

There will be many obstacles towards effectively planning for climate change but the threats to quality of life and transportation systems from inaction could be severe. Quantifying GHG emissions from transportation plans will unquestionably be one of the most challenging technical components of integrating climate change into transportation planning. Some of these challenges would include:

- There are often inconsistencies between the transportation components of a state-level GHG inventory and forecast (based on sales data) and a metropolitan level GHG inventory and forecast (based on VMT from a travel demand model).
- There are uncertainties regarding the appropriate geographic scale for estimation of project level GHG emissions.
- Current EPA emissions models are not well suited for analysis of the GHG impacts of transportation plans.
- Given the importance of a life-cycle approach to GHG emissions analysis, there is uncertainty regarding the need to estimate emissions resulting from transportation system construction and maintenance, as opposed to system use.

While improved integration of transportation and land use planning is a commonly suggested short and long term strategy to minimize GHG emissions, numerous regions throughout the country such as St. Louis do not have the necessary legal authority or the political culture to effectively integrate regional land use planning into local development decision making processes. Other transportation focused strategies such as road pricing and substantially improved transit systems face a variety of political and financial barriers. The principle role of the MPO in the short term should be to begin the process of developing support from key partners on broadly accepted GHG reduction goals and strategies. As a uniquely regional voice for the St. Louis region, EWGCOG is encouraged to assemble and cultivate a diverse collection of stakeholders in drafting a climate action plan for the purpose of identifying these goals and politically viable strategies for mitigating GHG emissions. The guidance, technical assistance, and leadership of the States will also be crucial for effective climate change efforts to advance.

15. It is recommended that the current Public Involvement Process (PIP) plan be updated for the purpose of incorporating goals and, the description of explicit procedures, strategies, and desired outcomes for the ten listed areas called out in 23 CFR 450.316 (a). This update effort must be developed in consultation with all interested parties.
16. It is recommended that EWGCOG develop a formalized Title VI Policy that outline the roles and responsibilities for prompt processing and disposition of Title VI complaints received by EWG in connection with all projects (local & MoDOT sponsored).
17. It is recommended that the MPO strive to substantiate provisions of the annual self-certification and document the performance of the metropolitan planning process. Documentation can occur through the self certification process itself or if more applicable, through strategic planning and performance monitoring of safety, congestion, air quality, public participation and many other transportation planning issues.

Overview of the Metropolitan Planning Area

Regional Perspective

The St. Louis, MO-IL TMA is the 19th largest in the United States with a total population of 2,482,935 persons with approximately 80% of that population residing in the State of Missouri. The TMA covers an eight county area and the Central Business District is centered near the confluence of the Mississippi and Missouri Rivers. St. Louis has many nicknames including the "Gateway City", as it is often seen as the East-West dividing mark for the United States.



St. Louis is served by four interregional interstate highways including I-70, I-55, I-64, and I-44 as well as the beltway or connecting interstates marked as I-270, I-255, and I-170. Other primary routes include US Routes 40, 50, 61, and 67; Missouri State Highways 21, 30, 94, 100, 141, 340, 364 and 370; and Illinois State Highways 3, 4, 15, 143, 159 and 255. The Central Business District has four river crossings including the Poplar Street Bridge which carries traffic from three interstate highways and one U.S. route. The region has significant aviation assets including Lambert-St. Louis International Airport, MidAmerica St. Louis Airport, Scott Air Force Base, and several small, regional airports. The region is also served by six Class 1 railroads and has fourteen active ports. Separated multi-use paths and on road bicycle lanes are provided in portions of the area. Metro (formerly known as the Bi-State Development Agency) is the regional transit operator. It operates bus and MetroLink light rail services in St. Louis City and County and paratransit service in St. Louis City and County. Transit services in St. Clair County are operated by Metro under a contract with the St. Clair County Transit District while the Madison County Transit District operates its own bus and paratransit system.

Community History

Cahokia is the site of an enormous ancient city that was inhabited from approximately 700 A.D. until sometime near 1400 and at its peak boasted an estimated 20,000 person population. The site is named for the Cahokia subtribe of the Illiniwek (a loose confederacy of related tribes) who moved into the area in the 1500s and were nearby when European exploration of the Mississippi River began in the mid-16th Century by Spaniard Hernando de Soto.

The French established the first settlement in the region at Cahokia in 1699 while Catholic priests established a small mission in what is now the City of St. Louis in 1703. Pierre Liguist Laclède, a French nobleman who was charged with constructing a fur trading post near the confluence of the Mississippi and Missouri rivers, founded the City of St. Louis in 1764. The city grew as its position in river trade expanded and development centered on the settlement's Mississippi River bank in the area now called "Laclède's Landing".

St. Louis was acquired by the United States from France in 1803, as part of the Louisiana Purchase. Missouri entered into the Union as a State in 1820 under the Missouri Compromise which stipulated that all the Louisiana Purchase territory north of the southern boundary of Missouri, except Missouri, would be free of the institution of slavery while the territory below that line would allow slaves. The two trials of Dred Scott, a slave who sued for his freedom, in 1847 and 1850 were heard in St. Louis' Old Courthouse and initiated a series of events which concluded with a U.S. Supreme Court decision in 1857 that accelerated the start of the Civil War.

In 1876, the City of St. Louis voted to secede from St. Louis County and become an independent city in order to preserve its tax revenue from being utilized in the primarily rural and sparsely populated county. This action continues to be problematic for the City today, as development and taxation are restricted to a small geographic area.

St. Louis developed throughout the late 19th and early 20th Century as an industrial city, and manufacturing remained the basis of its prosperity into the middle of the 20th century. While the region was experiencing widespread growth and expansion, racial discrimination was still commonplace, particularly in employment and through race based restrictions on real estate ownership. The later half of the 20th Century was characterized by sharp declines in regional growth and continued suburbanization. From 1970 to 2000, the region's population grew by 4% while the urbanized area expanded by 89%. This low density development generally isolated residential areas from commercial and industrial areas, advanced dependence on the automobile, and rendered transit and walking impractical for many trips. Consistent with national trends, the manufacturing base in the late 20th Century declined and economic growth relied on service and retail commerce.

Existing Conditions

The St. Louis region continues to experience stable but slow population and employment growth. Compared to 34 peer metropolitan areas, St. Louis is 26th in population growth, 26th in employment growth, and 33rd in per capita gross metropolitan product. Continued suburbanization has caused a loss of population and jobs in older communities and has resulted in a concentration of poverty in these communities. Most of these communities are in the region's core and have lost much of their tax base but must still maintain their



public infrastructure and services in a fiscal environment of rising costs and decreasing revenues. Furthermore, a consequence of growth predominately relying on intraregional migration has been an intense competition for tax base that may contribute to an institutional reluctance to embrace regional cooperation. These conflicts can be particularly challenging to reaching consensus on regional goals given the natural political fragmentation that occurs from the existence of over 200 units of local government in an eight county region. One response to these concerns has been the launch of the EWG Regional Fiscal Reform project that is designed to inventory all incentivized development projects in the region, measure their performance, measure what impacts incentivized projects have had on local governments' abilities to provide services, and measure what impacts incentivized projects have had on economic and racial disparities in the region.

Transportation is one of several key factors that influence the quality of life in the St. Louis region. While the regional inventory of transportation assets is diverse; aging roadways and bridges, increasing debt service, limited finances, and increasing public expectations for mobility and accessibility combine to define a transportation system that has many critical needs. Among the highest profile transportation issues has been the development of a New Mississippi River Bridge (NMRB), the preservation of the existing system as evidenced by the total reconstruction of Interstate 64 through the Missouri portion of the region, and the financial capacity of Metro. The NMRB is particularly noteworthy and is attempting to address longstanding congestion and safety concerns resulting from the fact that there are currently fewer lanes crossing the Mississippi River in the St. Louis Central Business District than in 1967. Despite the largest collection of funding earmarks for any single project from the last authorization of federal transportation legislation, the project has languished from regional disagreements on design and financing and the resulting cost increases from continued delay.

**Population Change in the St. Louis Region
1950-2000**

County	1950	1960	1970	1980	1990	2000	1950-2000
St. Louis City	856,796	750,026	619,269	452,804	396,685	348,189	-59.4%
St. Louis	406,349	703,532	952,050	974,180	993,508	1,016,315	150.1%
St. Charles	29,832	52,970	93,628	144,107	212,751	283,883	851.6%
Jefferson	38,007	66,377	105,661	146,183	171,380	198,099	421.2%
Franklin	36,046	44,566	55,533	71,233	80,603	93,807	160.2%
Missouri Subtotal	1,367,030	1,617,471	1,826,141	1,788,507	1,854,927	1,940,293	41.9%
Madison	182,307	224,689	251,383	247,664	249,238	258,941	42.0%
St. Clair	205,995	262,509	285,181	267,531	262,852	256,082	24.3%
Monroe	13,282	15,507	18,702	20,117	22,422	27,619	107.9%
Illinois Subtotal	401,584	502,705	555,266	535,312	534,512	542,642	35.1%
Regional Total	1,768,614	2,120,176	2,381,407	2,323,819	2,389,439	2,482,935	40.4%

Process Review Elements

A summary of the elements considered in this review is provided below. Each element will be discussed in the following format:

1. The background is given for the basis of each *requirement*,
2. A summary of the current *status* based on ongoing contacts, review of planning products throughout the year, and input provided in the discussions with the planning partners, and
3. The *findings* of the review team on the adequacy of the process.

Organization of the Metropolitan Planning Organization

Requirement: Federal legislation requires the designation of a Metropolitan Planning Organization for each urbanized area (UZA) with a population of more than 50,000 people. The voting membership of an MPO policy board designated after December 18, 1991 and serving a TMA must include local elected officials, officials of local agencies that administer or operate major modes of transportation within the area, and appropriate State officials. Existing MPO designations, made prior to December 18, 1991 remain valid until a new MPO is redesignated.

Status: The East-West Gateway Coordinating Council was designated the MPO for the St. Louis region in 19XX by the Governor of Missouri and in 19XX by the Governor of Illinois. The MPO operates under multiple agreements for transportation and air quality planning.

The Board of Directors is the policy making body for the MPO and Council of Governments (COG) and consists of twenty-four voting members and five non-voting members who represent agencies and governments throughout the eight county region in Missouri and Illinois. While almost 80% of the region's population resides in Missouri, the twenty-four voting members are divided evenly between the two states. It is also significant to note that the Board of Directors includes Chief Officers and does not allow representation by proxy.

After the last US DOT Planning Certification Review, the Board membership was modified by an amendment to the agency's bylaws. The intent of the change was to increase and diversify the representation on the Board by elected officials at various levels of local government and to change the balance of membership to more closely correspond to the demographics of the region. As part of these changes, the Chair of Metro was changed from voting to non-voting status to be consistent with the voting privileges of other implementing agencies.

The EWGCOG Executive Advisory Committee (EAC) is the chief working committee of the COG and reports directly to the EWGCOG Board of Directors. The EAC consists of key staff members appointed by Board members, and selected additional members. The EAC considers all matters that will come before the Board of Directors.

The Transportation Planning Committee (TPC) consists of transportation oriented staff members appointed by the Board of Directors representing local jurisdictions. In addition, members of all implementing agencies are represented as well as other modal and resource interests. The TPC considers matters relating to the implementation of the TIP and Transportation Plan, including administrative procedures and project evaluation. The TPC's role is to advise, assist, and make

recommendations to the EAC and the Board of Directors. The TPC has two standing subcommittees, the Missouri subcommittee of the TPC and the Illinois subcommittee of the TPC, who meet separately throughout the year.

The Air Quality Advisory Committee (AQAC), is also appointed by the Board, and consists of members of the resource agencies, implementing agencies and environmental interests. The AQAC considers matters concerning the relationship between air quality and transportation. The Paratransit Advisory Committee includes individuals in the region who are knowledgeable about the transportation needs of the elderly, the disabled, and others with special needs. The Transportation Safety Advisory Committee considers matters concerning the state of the region's roadways as they relate to safety and methods to improve safety. The Bicycle and Pedestrian Committee considers matters relating to the region's investment in bicycle and pedestrian modes.

The Executive Director of EWGCOG is Mr. Les Sterman whose position is overseen by the Executive Committee of the Board of Directors. Mr. Sterman leads a staff of approximately 60 persons who are organized into five departments: Administration, Transportation Planning, Community Planning, Research Services, and Regional Security Planning. The responsibility of the staff is to advise the Board of Directors on all key decisions.

Recent noteworthy changes to the staff organization include the creation of the position of Deputy Executive Director and the development of the Research Services department. The Deputy Executive Director focuses on internal management, including recruitment and retention of staff, project management oversight, and contracts administration so that the Executive Director can focus on the agency's external priorities within the St. Louis region and nationally. The Research Services department was created to support all of the agency's program areas with in-depth research and policy analysis.

Finding: The current organization of the MPO meets the requirements of this section of regulation. EWGCOG is commended for the creation of the Research Services Department and is encouraged to continue investing in quality, data-driven analysis on the myriad of issues impacting quality of life throughout the region. Additionally, it is anticipated that the Research Services Department could also play an important role in the performance monitoring and analysis of numerous aspects of the regional transportation system.

Metropolitan Area Boundaries

Requirement: The metropolitan area (planning area) boundary should, at a minimum, cover the UZA and those areas likely to become urbanized within the twenty-year life of the Long Range Transportation Plan. Copies of the boundary maps must be submitted to FHWA and FTA, after their approval by the MPO and the Governor.

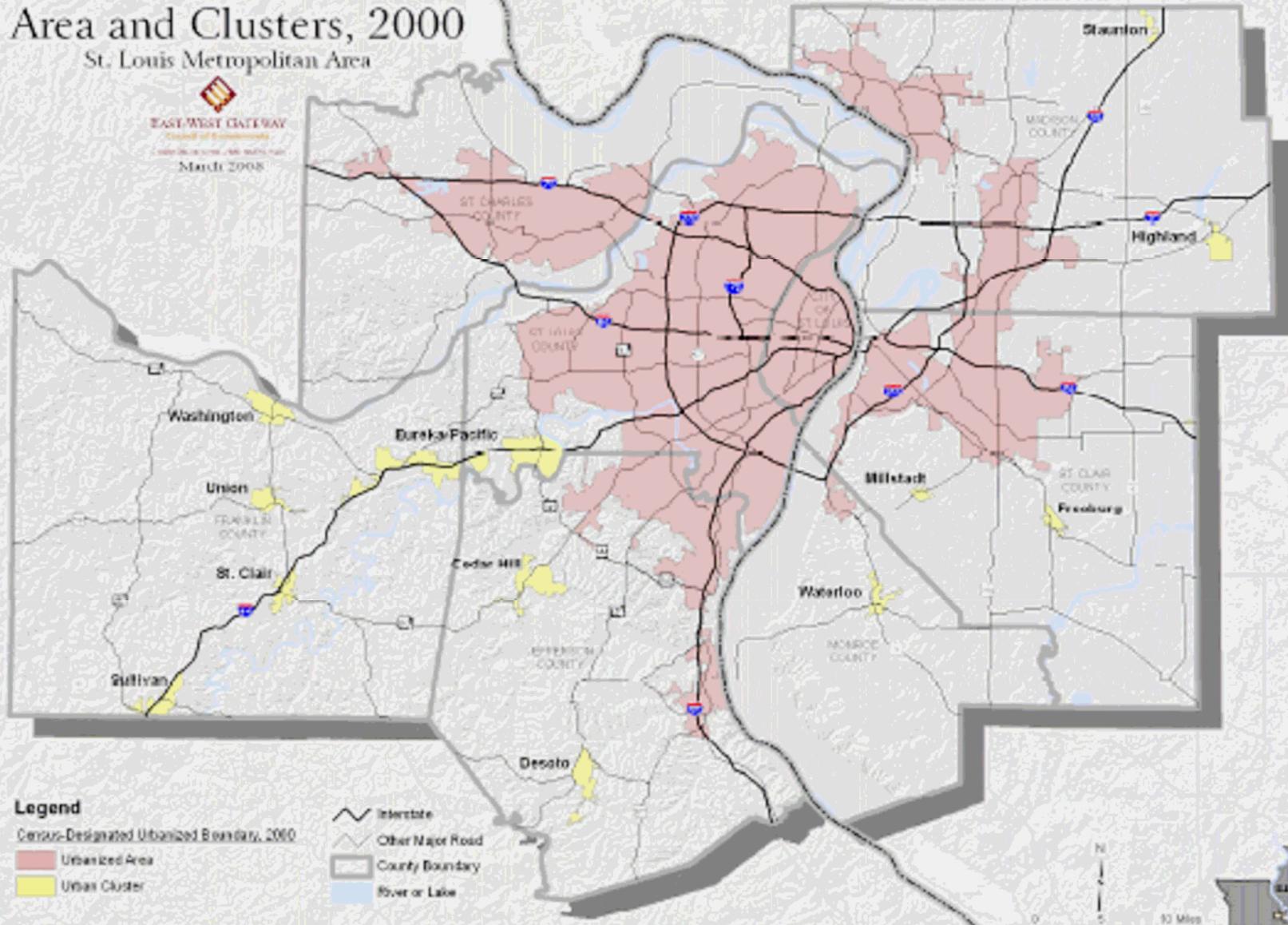
Status: Since the last Planning Certification Review, there have been no changes to the metropolitan planning area boundary maps which have previously been developed and approved by the MPO and by the Governor of each state.

Finding: The metropolitan planning area map, which meets the criteria of this section of regulation, is on file at the FHWA Division Offices.

Census-Designated Urbanized Area and Clusters, 2000

St. Louis Metropolitan Area

EAST-WEST GATEWAY
 Council of Governments
 1000 N. GARDEN, SUITE 1000
 March 2008



Legend

Census-Designated Urbanized Boundary, 2000
 Urbanized Area
 Urban Cluster

Interstate
 Other Major Road
 County Boundary
 River or Lake



Source: US Census Bureau, East-West Gateway Council of Governments

Agreements

Requirement: At a minimum, cooperative agreements are to be in place between the MPO and the State DOT, and between the MPO and public transit operators. These agreements should describe how these parties work together to accomplish specific tasks.

Status: The MPO operates under two agreements for metropolitan planning. The Missouri portion of the region is predominately administered by a Memorandum of Understanding (MOU) between EWGCOG and the Missouri Highway and Transportation Commission (MHTC). This MOU was most recently updated and signed in 2004. Transit providers and the Illinois portion of the region operate under a cooperative agreement between EWGCOG, IDOT, Metro, and the Metro-East Transit Districts. This cooperative agreement was most recently updated and signed in 2007.

Agreements are also in place between EWGCOG, IDOT, the Illinois Environmental Protection Agency (IEPA), Jersey County, and Baldwin Township for air quality planning, monitoring, and analysis for air quality non-attainment regions in Illinois adjacent to the EWGCOG Planning Area Boundary.

Finding: The agreements discussed in this section meet the federal requirements. Should new agreements be necessitated or desired for any reason, a single agreement among MPO members, the States, and transit operators is encouraged to help promote regional coordination and cooperation.

Responsibilities, Cooperation and Coordination

Requirement: Federal legislation requires the MPO, in cooperation with the State DOT and transit operators, to be responsible for carrying out the transportation planning process. These entities must cooperatively develop the Unified Planning Work Program (UPWP), Long Range Transportation Plan (LRTP) and Transportation Improvement Program (TIP). The MPO must coordinate the development of the LRTP and TIP with other transportation providers such as regional airports, maritime port operators and rail freight operators.

Consultation means that one party *confers* with another identified party, and prior to taking action(s), *considers* that party's views. Cooperation means that the parties involved in carrying out the planning, programming and management systems processes *work together* to achieve a common goal or objective. Coordination means *the comparison of* the transportation plans programs and schedules of one agency with related plans, programs and schedules of other agencies or entities with legal standing, and adjustment of plans programs and schedules *to achieve general consistency*.

Status: The MPO, States, and transit operators develop the products of the planning process in a cooperative manner. The EWGCOG Board of Directors approves the final UPWP, LRTP, and TIP after consideration of public input and providing other modal operators the opportunity to review and comment on these products.

Finding: The participants in the planning process satisfy the requirements for this section of the transportation planning regulations.

Providing truly cooperative public policy can be challenging in the St. Louis area due to the geopolitical structure of the region. It is not uncommon for competing interests to emerge from local government to local government, center city to suburb, or from state to state. These struggles frequently occur in the context of many investment decisions the MPO must reach concerning issues such as the distribution of suballocated funding, the need and ability to support transit expansion, or the financing of bi-state programs or projects. Furthermore, it would be unwise to ignore other difficult public policy matters outside of transportation that ultimately have an influence on MPO decisions such as competition for tax base, affordable housing, or funding of other public services and infrastructure. While these struggles are not uncommon in large and even medium sized communities throughout the nation, the degree of political fragmentation in St. Louis compounded with deeply entrenched cultural differences among various segments of the population and local and state governments creates a challenging environment for cooperative decision making.

The organizational structure of the EWGCOG Board of Directors provides the necessary forum to address these challenges and the responsibilities of the MPO provide the opportunity for the Board of Directors to lead the region in the implementation of integrated services despite diverse interests. Decisions in upcoming years on a variety of issues such as security and disaster preparedness planning, congestion management, or air quality planning will shape the ability of the region to collectively demonstrate this leadership.

While intraregional competition may be a principal barrier for cooperation between local governments, there are also concerns with tendencies by the State DOTs to discount the needs of the MPO. While it might be easy and convenient to cite failures in coordination and cooperation within the context of the New Mississippi River Bridge (NMRB), much less complex and demanding issues can also illustrate weaknesses specific to the planning process. Significant differences in the programming of suballocated funding, uneven administration of and participation in corridor studies, and the need to have separate cooperative agreements between the MPO and each of the states demonstrate a preference towards maintaining historical hierarchies and procedures than reaching consensus on coordinated planning policies and procedures.

Recommendation #1 – The MPO should provide leadership to the St. Louis, MO-IL TMA through improved regional cooperation for transportation policy and investment decisions. Although the EWGCOG structure provides opportunities for enhanced cooperation and coordination, there are currently few ways to mediate conflicts between divergent local or regional interests. Only through continued focus on collective goals and implementation of strategies advancing those goals will the region move beyond intraregional competition and better position itself to meet public policy challenges.

Improved cooperation and coordination between the States and the MPO should occur at many levels. EWGCOG should work with the State DOTs to develop schedules so that the MPO has the formal opportunity to proactively discuss regional priorities with the States prior to the development of State highway and transit programs. The State DOTs should also commit to providing the MPO anticipated funding amounts for upcoming planning funds (CPG, PL, 5303) and project implementation funds (STP-S, CMAQ) as early as feasible so that EWGCOG staff

can properly prepare budget and administer various programs. Project level communication can also be improved by the States. For example, closer coordination between MoDOT and EWGCOG and its member agencies would be valuable during the development of the supplemental environmental impact statement related to the I-70 Corridors of the Future project. Likewise, IDOT has not fully engaged EWGCOG in previous corridor studies such as the Gateway Connector and the IL 159 feasibility study.

Unified Planning Work Program

Requirement: MPOs are required to cooperatively develop a Unified Planning Work Program (UPWP), in cooperation with the State and transit operators, which discusses planning priorities and documents the transportation and air quality planning activities anticipated in the area for the next one or two years.

Status: The MPO cooperatively develops an annual UPWP that discusses the transportation planning priorities, budget, and scope of work for the fiscal year (July 1 through June 30).

The MPO utilizes a variety of resources to account for the non-federal share of UPWP expenses. Currently, the City of St. Louis and the member counties contribute approximate \$310,000 annually while the states of Missouri and Illinois appropriate approximately \$30,000 and \$300,000 respectively. Another source of non-federal match is a TIP application fee imposed on suballocated federal funding categories for which the MPO has decision making authority. Project sponsors are required to submit one-half of one percent of the federal funds requested. If the project does not advance to the TIP, the fee is refunded. The amount received each year from this source has varied widely, from a high of \$335,100 to a low of \$158,100. The final source utilized is in-kind match. In the 2009 UPWP the MPO is utilizing in-kind from MoDOT. In previous years, the agency has also obtained match from member counties and municipalities for specific planning studies.

EWGCOG currently has a carryover balance of Federal metropolitan planning funding of approximately \$4 million which is approximately one year's worth of metropolitan planning appropriations for the St. Louis region.

The UPWP provides summary funding and expenditure charts that detail revenue and cost estimates for each work element. Additional charts provide sources of federal funds and amounts of matching funds by state and fund type as well as the amounts and sources of other local funding. The narrative sections provide a cost estimate for each "work element" but not for each individual work activity that is listed within each work element. Following the 2004 Review, the EWG began to show a cost estimate for all major work activities that appeared as lettered headings within a coded more broad work element. However, this practice was not reflected in the FY2009 UPWP. To ensure adherence with Federal requirements given under 23CFR Part 420.111 relative to showing cost estimates for each work activity and for the purpose of providing complete information to the public, EWGCOG needs to continue this practice for the FY2010 UPWP

The metropolitan planning work performed by MoDOT on behalf of the EWG can be considered as a “cost incurred” as a result of carrying out an eligible PL activity. The MoDOT salaries used in this instance are allowable and are eligible for reimbursement. The authority cited for allowing this funding arrangement is 23 CFR 18.24 (a)(1). The MoDOT’s incurred costs are “direct cost” that are tied to a specific EWG PL work element. The description of the MoDOT work and the cost estimate for said work is clearly identified in Element 2.04 and the Appendix A section of the EWG FY2009 UPWP. It is equally important that the MoDOT direct cost work be clearly described and accounted for in the EWGCOG progress reports and end of year annual expenditure report. The EWGCOG is encouraged to show a cost estimate for all major work activities that appear as lettered headings within a coded more broad UPWP work element.

Finding: The format of the UWP is acceptable and the description of the work to be undertaken is thorough. The requirements of this section of the planning regulations are satisfied.

While funding is generally well tracked and documented, the EWGCOG is encouraged to clearly identify the description of the MoDOT direct cost work and the cost estimate for said work in the UPWP. Direct cost work should also be clearly described and accounted for in the EWGCOG progress reports and end of year annual expenditure report.

US DOT is comfortable with the amount of carryover balance and encourages EWGCOG to be prepared to utilize this balance as necessary if metropolitan planning appropriations are reduced in future years to ensure Highway Trust Fund sustainability.

Metropolitan Planning Process Elements

Requirement: SAFETEA-LU identifies eight planning factors that must be explicitly considered, analyzed as appropriate, and reflected in the planning process products. The planning factors are discussed collectively below with their status and the Review Team’s findings. Subsequently, the Review Team is providing a separate review and analysis of the status of safety conscious planning, security, environmental protection and enhancement, transit, and non-motorized transportation.

The Eight Planning Factors

Status: The planning factors identified in federal legislation are identified throughout the planning process and products of the MPO. While the eight SAFETEA-LU factors are not often referenced explicitly, the MPO has defined six priority areas to guide the planning process (in order of priority):

1. **Preservation of the Existing Infrastructure** is achieved by managing and maintaining current roadway, bridge, transit, and intermodal assets.
2. **Safety and Security in Travel** is achieved by decreasing the risk of personal injury and property damage on, in, and around transportation facilities.
3. **Congestion Management** is achieved by ensuring that congestion of the region’s roadways does not reach levels that compromise economic competitiveness.
4. **Access to Opportunity** is achieved by addressing the complex mobility needs of persons living in low income communities and persons with disabilities.

5. **Sustainable Development** is achieved by coordinating transportation needs, land use plans, economic development goals, environmental quality standards, and community aesthetics.
6. **Efficient Movement of Goods** is achieved by improving the movement of freight within and through the region by rail, water, air, and surface transportation modes.

These six priority areas form the basis for the goals and strategies identified in the St. Louis metropolitan planning process. Additionally, Legacy 2035 and project ranking processes identify performance measures for each these priority areas.

Finding: The planning partners are making satisfactory progress in addressing the planning factors of SAFETEA-LU. As appropriate, EWGOG is encouraged to further document the linkages between the priority areas and the work elements of the UPWP. Additionally, EWGCOG should look for opportunities to document linkages between work activities and the SAFETEA-LU planning factors related to economic vitality and system management and operations as these issues may be underemphasized as defined in the current six priority areas.

Safety Conscious Planning

Status: The intent of safety conscious planning is to consider different aspects of transportation that can be impacted by early decisions regarding land use and site design, access management, transportation operations, traveler behavior, and modal requirements, such as roadway geometrics. By focusing on reducing or avoiding safety conflicts, future crashes may be prevented or the severity of future crashes may be lessened. Efforts should address safety solutions in Engineering (infrastructure improvements), Enforcement (red light running, speed limits), Education (bicycle education, youth alcohol awareness), and Emergency Services (incident management, emergency access to incident locations). These four categories are commonly referred to as the “Four E’s” of safety.

EWGCOG launched the Travel Safe initiative in 2004 with the goal of saving lives and reducing injuries in the region. The effort included a citizen driven multi-media campaign that also included participation from the Monsanto Corporation and the American Automobile Association (AAA). EWGCOG hosted a Regional Safety Conference to raise awareness about transportation safety issues and to share best practices in each of the Four E’s. A Regional Travelsafe Communities Congress was also organized at that time to manage the development and implementation of regional safety strategies over the long term.

State DOT safety initiatives have included the development of Missouri Blueprint for Safer Roadways and the Illinois Comprehensive Highway Safety Plan (CHSP). There are many common areas of emphasis in these efforts and both plans have set specific goals for aggressively reducing roadway fatalities. Both states have also utilized federal funding programs that were instituted in SAFETEA-LU including the Highway Safety Improvement Program (HSIP) and the Safe Routes to Schools program (SRTS). Communities in the St. Louis region have had some success capturing a portion of funding available to local agencies through SRTS and HSIP as well as its predecessor program, the Hazard Elimination-Safety (HES) program.

The FY 2009 UPWP identifies a series of planning activities under the title of the Transportation Safety Initiative. Included in these activities is the staffing and convening of a Regional Safe Communities Network as well as participation in the Missouri Coalition for Roadway Safety. The UPWP also indicates that EWG will support comprehensive safety planning in TravelSafe zones throughout the St. Louis region and implement the *CRASH! The Science of Collisions!* high school education program in conjunction with Monsanto.

Finding: EWGCOG has demonstrated leadership in the advancement of safety conscious planning in the St. Louis region. While each of the planning partners strives for a safe transportation system, continued advancements will likely require that the MPO and State DOTs aggressively advocate for the further consideration and incorporation of safety into all aspects of the planning and project development processes. EWGCOG should lead and facilitate dialogue of the Four E's within the MPO framework and with non-traditional safety partners. EWGCOG should also serve as a regional clearinghouse for safety data, analysis, and performance monitoring. Policy and project level decision making will likely only be further improved by consistently articulating and supporting these priorities.

Security

Status: Security planning includes activities and products developed in response to identified criminal threats to high value, vulnerable elements of the transportation system. Preparedness planning includes activities and products developed in response to the threat of environmental hazards and natural occurrences. All of these hazards have the potential for causing casualties, disrupting communities, interrupting the flow of commerce, and damaging or destroying public and private property.

The St. Louis Area Regional Response System (STARRS) is a consortium of key public and private organizations that has been organized to address critical security and preparedness needs in the region. The organization manages regional security funding for the bi-state metropolitan region which amounts to approximately \$10 million in FY 09. STARRS staff are employees of EWGCOG and regional security planning is organized as a department within the agency like the other program areas of Transportation Planning, Community Planning and Research Services. EWGCOG is the fiscal agent for STARRS, and executes the purchasing of equipment and services for STARRS projects. STARRS staff organizes and coordinates the planning for security across the five major disciplines involved in emergency preparedness and response (law enforcement, fire, public health, hospitals, and emergency management). As all regional funding is funneled through STARRS and EWGCOG, STARRS coordinates the development of priorities for the expenditure of those funds, and with the assistance of the Council's accounting staff, manages the grants.

Coordination between the metropolitan transportation planning process and STARRS began during the development of the last long range plan, Legacy 2035. The Council's transportation planning staff included STARRS management staff in the plan development through regular communication and inclusion on the internal long-range plan committee. In addition, STARRS coordinates with the region's transit agency, Metro, and Lambert International Airport on security and interoperable communications matters. The District Engineer of MoDOT sits on the

STARRS Board of Directors and provides advice on regional transportation issues as they affect regional security.

STARRS initiated the Regional Emergency Coordination Plan project in 2008, and will include transportation planners and engineers in its design. One component of the plan will include an updated evacuation plan that will be coordinated between transportation and emergency response personnel throughout the region. Other elements of the plan intersect with transportation planning including the identification and protection of critical infrastructure, coordination of resources in the event of a disaster, and coordination of communications. It is anticipated that STARRS staff and the EWGCOG's transportation planning staff will incorporate elements of the Regional Emergency Coordination Plan into the region's next long range transportation plan.

Finding: Because of the widely varying political and institutional contexts for MPOs throughout the United States, there is no singular model that can best describe the most appropriate role for MPOs in security and disaster planning. However, the organization of STARRS and the evolution of this entity toward greater interaction with the transportation planning activities of EWGCOG demonstrate an effective and commendable approach to security planning. The St. Louis region is vulnerable to all types of intentional and unintentional threats and STARRS is well positioned to implement solutions to mitigate and minimize risks.

Despite the organizational successes of STARRS, the region continues to face substantial challenges in collaborating effectively on security and emergency preparedness. By covering two states, eight counties, and over two hundred municipalities, the geopolitical nature of the region dictates that effective coordination is particularly challenging. Individual jurisdictions appear well prepared to handle disasters within their borders and even assist one another through mutual aid as long as the system is not stressed to the breaking point by a large scale disaster. Because the region has not been stressed by such a catastrophe, it is likely that it will take time for people and institutions to fully adapt to cooperative security planning. Therefore, USDOT encourages STARRS members to continue to advance regional cooperation and coordination among and across disciplines.

Environmental Protection and Enhancement

Status: Since the passage of new regulations in SAFETEA-LU, EWGCOG has vigorously advanced efforts to incorporate environmental considerations in the transportation planning process. Environmental consultation efforts with federal, state, and local resource agencies were initiated within the context of the update to the LRTP, *Legacy 2035*. EWG staff worked with these agencies to inventory readily available natural resource data and to evaluate the types of analysis that could be accomplished with available tools. These efforts resulted in an extensive GIS database of environmental resources. Using the regional land use forecasting tool LEAM and this GIS database, staff conducted an environmental stress analysis, which analyzed the amount of stress of development pressure potentially affecting natural and historic resources in the region as a result of various transportation investments. Nearly thirty agencies were engaged within the year-long LRTP consultation process which also included a series of meetings that focused on:

- Educating resource agencies on the transportation planning process and SAFETEA-LU requirements
- Sharing information between agencies on missions, projects, and data
- Gathering information on how EWG could assist and integrate environmental objectives
- Exploring various ways of performing the environmental stress analysis

After demonstrating the environmental stress analysis to the interagency consultation group, participants stated a desire to pursue more joint activities in the future and expressed support for EWGCOG's effort to develop more fine-tuned data that would enhance resource planning and lead to more progressive approaches for mitigating the environmental impacts of infrastructure and associated development. Staff continued to work with the participants to define the strategies and policies adopted in Legacy 2035. These policies included endorsing the development of an environmental framework to support long-range regional planning and working together to develop regional ecosystem level approaches to environmental mitigation.

The environmental efforts utilized in the development of Legacy 2035 are now evolving under the title of the Ecological Approach to Infrastructure Development. This initiative includes activities that will span the next several years. A primary activity launched in 2008 is to develop a uniform, high resolution data set called an "ecologically significance" coverage file. This work will be conducted in close partnership with the Missouri Resource Assessment Partnership (MoRAP) at the University of Missouri-Columbia. MoRAP is a unique partnership of federal and state resource and regulatory agencies, and it possesses the geospatial analysis expertise needed to develop the natural resource management and planning information vital to EWGCOG environmental efforts. The information developed through this process will provide a basis for coordination of mitigation efforts among agencies, and will be useful for local planning staffs. Data will be shared with all organizations interested in building regional planning capacity. EWGCOG is also using the data shared during consultation efforts to develop an environmental atlas that will inventory and illustrate the condition of environmental resources in the region. An online resource will also be developed to help foster communication and data sharing and provide information on tools, such as low impact development, to help enhance planning relative to the natural environment.

Finding: EWGCOG initiatives for environmental mitigation and consultation are outstanding and should be considered national best practices for SAFETEA-LU implementation.

Recommendation #2 –It is recommended that EWGCOG continue their leadership role by seeking opportunities to advance linkages between the transportation planning process and the NEPA process. Examples of transportation planning decisions and analyses that may be carried through to the project development and environmental review process include foundations for purpose and need statements, preliminary screening, evaluation and elimination of alternatives, planning level evaluation of indirect and cumulative effects, and regional or ecosystem level mitigation options and priorities.

Freight

Status: EWGCOG convened a freight advisory committee in the 1990's to attempt to provide a framework for incorporation of freight interests into the investment decision making process. This group struggled with incorporating the needs, expectations, and timetables of private industry within the public planning process but was successful in developing the report, *Industry Perspectives and Recommendations for a Regional Freight Planning Process*. The freight advisory committee was subsequently disbanded and implementation of recommendations has come slowly. The MPO has instead adopted the strategy to focus on individual freight projects of significance within the region and seeks to develop a *strategic regional intermodal freight investment plan*. Specific efforts in the near future may include developing an inventory of intermodal connectors throughout the region, utilizing the SmartPort project to improve coordination and communication with the railroads, and upgrading specific routes for freight such as Riverview Boulevard to provide a connection between I-270 and existing truck/shipping yards. A process has also been initiated to *Metropolitan Area Aviation System Plan to promote greater coordination and integration of the region's major aviation assets*. State specific efforts include \$10 million in seed money for statewide goods movement within the proposed \$931 million capital program in Missouri, *A Conversation for Moving Missouri Forward*.

A freight focus group was utilized in the development of Legacy 2035, the region's current Long Range Transportation Plan. The LRTP identifies a *Primary Goods Movement Network* however this network is based on a limited level of study. Interstate 70 has been designated as a "Corridor of the Future" by US DOT and has received \$3 million in Transportation, Community, and System Preservation (TCSP) funds for a study to evaluate the feasibility of constructing truck only lanes along I-70 from Kansas City to the Ohio/West Virginia border. The I-70 project has also received \$2 million in Interstate Maintenance Discretionary (IM-D) funds for supplemental environmental work in Missouri to evaluate the impacts of dedicated truck lanes. The dedicated truck lanes are envisioned to reduce congestion, improve safety, and offset the maintenance costs of general purpose lanes.

Finding: There is currently no freight advisory committee, in place within the St. Louis metropolitan planning area, to provide a framework for consideration and incorporation of freight interests into the MPO's investment decision making process. The EWGCOG staff has indicated that additional research is needed to effectively identify freight needs in the region and that the EWG and State DOT staff needs to develop increased expertise on freight issues.

Within the St. Louis region, there is substantial concern that the supplemental environmental work for I-70 does not adequately study urban areas such as St. Louis. There are no funds provided for study of I-270 which would likely need to be utilized as part of any multi-state improvement. Furthermore, the supplemental environmental analysis stops at the Missouri/Illinois border. Finally, there may be some local concern that simply moving freight through the region would provide a minimal stimulus for economic development typically enjoyed by improving freight capacity. The Review Team encourages the MoDOT and IDOT to engage in an ongoing coordinated and collaborative effort to advance substantive planning for the US DOT Corridors of the Future program on I-70. Additionally while funding is understandably a limiting factor in the supplemental environmental analysis, it is unlikely that significant value will be obtained from analysis that does not fully consider the benefits and

burdens of dedicated truck lanes to the metropolitan St. Louis region including I-270 and the part of the region within Illinois. Additionally, local concerns regarding the potentially limited benefit for local economic development need to be tempered as the Corridors of the Futures program is focused on improving inter-regional and national efficiencies and is likely indicative of future emphasis on redefining the interstate to serve national interests.

The Review Team encourages the MoDOT and IDOT engage in an ongoing coordinated and collaborative effort to advance substantive planning for the US DOT Corridors of the Future program on I-70.

Recommendation #3 – EWGCOG should build on the Legacy 2035 freight focus group and actively recruit representatives of the rail and trucking freight community within the region to be active participants in the planning process. However in order to achieve success, representatives of the freight community will need to see the value of participating in regional metropolitan planning. An initial focus should be to identify and assess the freight bottlenecks in the region, in addition to identifying critical intermodal connectors within the region. From there, development of the intermodal freight investment plan needs to focus on setting regional priorities as well as presenting potential short term and long term solutions.

Transit

Status: Overall ridership data on the regional system indicates that transit usage is at its highest levels since 1982 despite a series of service reductions and fare increases to Metro bus service over the last decade. Expansion of light rail service through the Cross-County route has dramatically increased MetroLink ridership to 25 million passengers, up from 16.6 million in 2006. Bus patronage has shown greater fluctuations than rail ridership although bus ridership in 2008 was the highest during this decade. Part of that increase in usage is likely attributable to higher fuel prices and perhaps some increase in transit is being realized from the I-64 closure, however it is important to note that significant ridership increases began before the closure and the major spike in fuel prices.

However, ridership gains in recent years have faced significant risk of falling due to the declining financial condition and future financial capacity of Metro. Numerous factors have contributed to recent budget shortfalls including the loss of federal operating assistance and a reduction in the already small assistance provided by the State of Missouri; unanticipated fuel price increases and a significant charge for other postemployment benefit (OPEB) costs; a \$10 million reduction in the FY 2009 subsidy from St. Louis County; construction cost increases for the Cross-County MetroLink that increased future debt service payments and reduced funds available to cover additional operating costs; and sluggish growth in St. Louis City and County sales taxes that has prevented the major source of Metro revenue from keeping pace with inflation. A \$45 million shortfall is projected for 2009. In response to these conditions, a half-cent sales tax referendum known as Proposition M was proposed in St. Louis County with half of the revenue dedicated towards MetroLink expansion and the remaining half contributing to preservation of existing services. However, Proposition M was defeated in November, 2008 and Metro has indicated that drastic service reductions will now be necessary to balance budgets.

Transit operations planning is performed by Metro without formal cooperation from EWGCOG. However, the agencies do interact in circumstances where a broader regional perspective is beneficial such as the implications of the recent sales tax referendum. More significant coordination occurs between the two agencies in the paratransit arena, with EWG leading the preparation of the Coordinated Human Services Transportation Plan (CHSP) and Metro administering the Job Access Reverse Commute (JARC) and New Freedoms (NF) programs. EWGCOG also works with Metro as well as the County transit providers in Illinois with bus stop accessibility efforts. Close coordination between the two agencies also occurs in major project development planning through the Transportation Corridor Improvement Group, which oversees all multimodal corridor studies in the Missouri portion of the region.

Finding: Transit planning is integrated into the metropolitan transportation planning process and there is coordination between staffs of the MPO and transit providers.

Many recent transit planning efforts have been and will continue to focus on operational improvements.

Empirical research has demonstrated that transport efficiency and transit ridership gains are maximized through increased residential and employment densities. It is expected that significant changes in development patterns would be critical to lowering transport costs and to increase mode choice for all residents in the St. Louis region.

The MoDOT recognizes that the Metro transit system is an integral part of the multi-modal system that is vitally important to the economic and social health of St. Louis region and the entire state. However, MoDOT provides funding for less than 1 percent of the Metro's Missouri transit operating budget. In stark contrast, the IDOT provides funding for 51 percent of the Metro's Illinois transit operating budget. The EWG believes that MoDOT needs to provide a more meaningful financial contribution to the transit mode of transportation, much the same as they pay to build, operate, and maintain highways for auto, truck, bicycle and pedestrian users. Given the Metro's increasing transit ridership numbers that are resulting from current economic and environmental condition incentives, the Review Team encourages the MoDOT to explore expanding the use of state revenue streams for transit.

Recommendation #4 – It is recommended that the next LRTP update and other planning efforts dedicate resources towards investigation of how transit is interrelated with land use and socio-economic conditions.

Recommendation #5 – Given the historical challenges of funding transit in the St. Louis region and the current potential reduction in transit services resulting from the defeat of Proposition M, additional consideration should be given to transit systems recapturing funds through a surface transportation financial model in which system user charges directly support transit services. These user charges could relate more closely to the true marginal costs of congestion, construction, operation and maintenance and could include various pricing techniques such as variable timing, VMT-based, and other user fees.

Non-Motorized Transportation

Status: The St. Louis Regional Bicycling and Walking Transportation Plan was adopted in July, 2005. The focus of this plan is to influence the planning, design, and development of the region's transportation system so that travel choices are increased and so that the mobility and safety of non-motorized users is improved. This plan departs from conventional bicycle and pedestrian plans which often focus on the development of priority corridors for bicycling and walking improvements. Rather than specify where facilities should be located, the plan attempts to serve as a resource document for communities determining when and how to implement facilities for non-motorized users by defining the nature of bicycling and walking environments and providing guidance on the elements common to model bicycling and walking facilities.

The MPO also has the ability to support and implement non-motorized transportation facilities through the programming of projects for the Surface Transportation Program Suballocated (STP-S) program and Congestion Mitigation and Air Quality (CMAQ) program. Additionally, the MPO administers the annual project selection process for the Transportation Enhancements (STP-E) program in Missouri. For each of these programs, project selection processes specify the eligibility of bicycle and pedestrian facilities and provide for their consideration within the framework of the defined six priority areas.

Statewide planning efforts in both Missouri and Illinois also continue to advance consideration of non-motorized transportation choices. Additionally, in October, 2007, the Illinois Legislature passed the Complete Streets Bill (605 ILCS 5/4-220) which requires that planning and development of transportation facilities, including their incorporation into State plans and programs, give full consideration to bicycle and pedestrian pathways. Implementation of the St. Louis Regional Bicycling and Walking Transportation Plan should aid local jurisdictions in Illinois in meeting Complete Streets requirements.

Finding: Through the development of the Regional Bicycling and Walking Transportation Plan and the implementation of the project selection processes for STP-S, STP-E, and CMAQ funds, the MPO has demonstrated a concerted effort to properly include non-motorized transportation options throughout the metropolitan transportation planning process. EWGCOG staff should continue to monitor and support local implementation of the Plan and its recommendations by member agencies. Periodic review of the effectiveness of the recommended measures by the EWGCOG Bicycle and Pedestrian Committee would also help identify necessary revisions to the plan and identify best practices for future planning efforts.

Travel Forecasting

Requirement: Numerous elements of the transportation planning process have analytical requirements based on valid forecasts of future demand for transportation services and the forecasted performance of the transportation system. These forecasts are frequently made using travel demand models, which allocate estimates of regional population, employment, and land use to person-trips and vehicle-trips by travel mode, route, and time period. The outputs of travel demand models are used to evaluate the impacts of proposed projects, various investment scenarios, and management and operations strategies. Additionally, models estimate regional

vehicle activity for use as inputs in motor vehicle emissions models for transportation conformity determinations in air quality nonattainment and maintenance areas.

Status: In 2002 EWGCOG conducted a household travel survey and an on-board transit survey. These surveys were intended to form the foundation for the development of a new travel demand model which was initiated in 2004. The current model, TransEval, is based on the regional travel patterns observed in those travel studies. TransEval is a singly-constrained model, with a joint destination choice and mode choice sub-model. In this joint model, productions are simultaneously distributed to zones and split into modes. Currently, the model is close to final validation both for highways and transit. EWGCOG is in the process of documenting all aspects of TransEval's performance.

In 2006, EWGCOG hosted an US DOT Travel Model Improvement Program (TMIP) sponsored peer review of the TransEval model under development to ensure that the technical processes being employed met professional practice standards. The review panel, comprised of national experts, made various suggestions that have since been incorporated into the model. Panelists noted that they found EWGCOG modeling staff to be very skilled and EWGCOG senior management to have demonstrated strong interest in and support for improving modeling in the region.

EWGCOG is also working with the University of Illinois at Urbana-Champaign to develop the Land Use Evolution and Assessment Model (LEAM), an integrated, land use-transportation model. This model disaggregates land into cells of 30 x 30 meters. The cells form the basis for land-use estimates, which are made according to characteristics of the cell such as development plans, distance to an expressway, and major population or employment centers. LEAM's premise is that the probability of development decreases in proportion to congestion, which in turn drives development to adjacent areas through a feedback loop between the land-use and travel models. This modeling effort is locally known as the Gateway Blueprint Model and is anticipated to provide unique and valuable analysis for evaluating the social, economic, and environmental impacts of various transportation investment decisions.

Finding: EWGCOG has demonstrated the analytical capability to forecast the future usage and performance of transportation facilities. The MPO's capabilities are sufficient to address the range of policy issues and modal options under consideration within the planning horizon.

The EWGCOG is encouraged to complete written documentation of the following subject areas and ensure that this information is readily available for public review at all times:

1. **Inventory of Current Conditions.** The foundation for any forecast is a comprehensive and objective inventory of current conditions with respect to both transportation supply and demand. This would include data for the highway system, transit system, other transport modes, population, employment, vehicle miles traveled (VMT), transit use, congestion, land use, and special conditions. Sources of this data should be identified as well as the anticipated frequency of updates to the data.
2. **Planning Assumptions.** The principal determinants of any long range travel demand forecast are the assumptions about demographic changes and the growth and distribution of population, employment, developed land, and individual travel preferences.

3. **Forecasting Methods.** The technical documentation of the travel model should include model specifications, significant changes from the most recent update, calibration data, survey methodology, model validation, network size including the number of analysis zones, and methodology for non-home based travel.

Long Range Transportation Plan

Requirement: SAFETEA-LU requires that TMAs develop a Long Range Transportation Plan addressing a minimum twenty-year planning horizon and that this plan be updated at least every four years in air quality nonattainment areas. The LRTP must be consistent with current and forecasted transportation/land use conditions and trends so that it can appropriately project transportation demand of persons and goods. In addition it must:

- Identify all transportation facilities that should function as part of an integrated metropolitan transportation system
- Reflect consideration of the eight planning factors of SAFETEA-LU
- Discuss types of regionally appropriate environmental mitigation activities
- Reflect consultation with Federal, State, land management, and regulatory agencies
- Include an acceptable financial plan
- Identify operational and management strategies
- Assess the investment necessary to maintain the existing and projected future transportation infrastructure
- Indicate transportation and transit enhancement activities
- Provide adequate opportunity for public official and citizen involvement

Beyond the first 10 years of the LRTP, the financial plan may reflect aggregate cost ranges/cost bands, as long as the future funding source(s) is reasonably expected to be available to support projected cost ranges/cost bands. The LRTP may also include “illustrative projects” that do not satisfy fiscal constraint requirements but can be included to provide for a more complete accounting of future transportation needs.

The Final Rule for Metropolitan Planning confirmed that any federal action taken on transportation plans and programs on or after July 1, 2007 are subject to adequately satisfying all updated SAFETEA-LU planning requirements. Additionally, after December 11, 2007, all amendments and updates to financial information in the LRTP are required to show that information in the year of expenditure of those funds.

Status: The EWGCOG Board of Directors adopted Legacy 2035, the region’s Long Range Transportation Plan, on July 27, 2007 with the intention of meeting all updated planning requirements of SAFETA-LU and the Final Rule for Metropolitan Planning. Legacy 2035 covers the entire area within the metropolitan planning area boundary and will maintain at least a twenty year planning horizon until the next LRTP update in 2011.

Legacy 2035 identifies eight goals that closely mirror the SAFETEA-LU planning factors and utilizes the six focus areas of EWGCOG to align each step of the planning process with the goals of the plan. The plan identifies and discusses different facilities and modes that comprise an integrated transportation system. Major sections of the plan include an overview of past and

current transportation planning in the St. Louis TMA, socio-economic and travel trends, strategies for the six focus areas, a financial capacity analysis and investment plan, and an air quality conformity determination. Three focus groups (environmental, economic development, and freight) of citizens and stakeholders were an integral part of the long range planning process and development of Legacy 2035.

EWGCOG staff consulted with local governments responsible for land use planning to develop population and employment forecasts for the LRTP. A 10.5 percent increase in total population is expected in the eight-county region by 2035. The plan considers this slow to moderate growth compared to other U.S. urban areas. The plan notes the importance of maintaining population density to maximize transportation investments. However, it is acknowledged that density has been dropping and will continue to decline, particularly in the core urban area. This is indicative of a continuing trend of residential and job development in exurban areas although it is expected that St. Louis County and St. Louis City will remain major employment centers. EWGCOG forecasts an increase of jobs in the region from 1.32 million in 2005 to 1.49 million, a rate of 13 percent. The plan illustrates the expected results from development by 2040 under a transportation plan no-build scenario and under a fiscally constrained scenario. It is concluded that there will be relatively small differences in the amount of land developed in these scenarios.

According to the Legacy 2035, overall VMT increases have been declining for a number of years while per capita VMT began to drop in 2005. Residents appear to be responding to the increasing amount of household budgets allocated to transportation fuel costs by taking more transit trips. Nevertheless, the MPO is unclear on the extent that these trends and developing alternative transportation fuels technology will impact future vehicle usage and VMT.

The plan provides a wealth of information on roadway and bridge conditions. Emphasis is clearly placed on preserving high-quality transportation infrastructure which includes maintaining highway system integrity while improving arterials, collectors and local roads. The plan also documents good fleet conditions for both Metro and Madison County Transit. Nearly 70% of all funding for the investments in Legacy 2035 are dedicated to maintenance, rehabilitation, and reconstruction of existing highways, bridges, and transit assets.

Legacy 2035 acknowledges that spatial separation of land uses has facilitated growth in traffic congestion and reduced the viability of transit and other alternative travel modes. The plan concludes that despite the region's relatively low level of congestion compared to other metropolitan areas, residents and goods movements face congestion daily and it is perceived to be a significant problem. Analysis is provided that indicates that the full build out of the plan will not eliminate congestion and also discusses that management and operations of the existing system through ITS and other techniques will be critical to maintaining safe and efficient travel. Legacy 2035 discusses the ongoing development of the region's Congestion Management Process (CMP) and identifies this effort as providing a coordinated program for data collection and system evaluation that will define the extent and duration of congestion.

The plan documents how EWGCOG initiated a consultation effort with resource agencies to establish dialogue on environmental mitigation priorities in relation to transportation. Consultation with these agencies will continue with focus on ecological, cultural and historical assets. Consultation and mitigation efforts utilized the previously discussed environmental stress

analysis to help consideration of the impacts of various investment scenarios. Other sustainability emphasis areas outlined for the future include the encouragement of actions that reduce travel demand, such as ridesharing and employer-based strategies, cooperative comprehensive planning amongst jurisdictions, high-speed rail, and New Starts funding, among others.

Legacy 2035 indicates that the region will possess approximately \$25 billion in revenue available between 2011-2035. This revenue is insufficient to fund the \$21.6 billion needed to maintain the system in addition to \$11.7 billion required for 55 major highway/transit projects and another \$5 billion that is necessary for projects that may result from 27 corridor studies. Preservation and operation needs will account for approximately 77% of IDOT projected revenue, 75% of MoDOT projected revenue, and exceed all revenue projected to be available to Metro. Various tables are provided and include priority projects that are fiscally constrained by time period. Illustrative projects and various future corridor studies are also prioritized and will be moved up for implementation should funding become available. The New Mississippi River Bridge is included in the fiscally constrained portion of the plan and is assumed to consist of a four-lane structure costing approximately \$550 million. Individuals and groups had several opportunities throughout the plan development process to provide input on the investment plan.

The St. Louis region is designated a moderate non-attainment area for ozone and fine particulate matter (PM_{2.5}) air quality standards. Legacy 2035 references the State Implementation Plans (SIPs) and summarizes analysis documenting a determination of conformity for Missouri and Illinois based upon the listed projects and programs.

Finding: Legacy 2035 was cooperatively developed and adopted by the MPO by the July 1, 2007 SAFETEA-LU implementation deadline and adequately addresses applicable regulations for LRTPs. The next update of the LRTP is due by 2011.

The New Mississippi River Bridge is appropriately included in the LRTP and satisfies guidance issued on January 28, 2008 for administration of Major Projects (projects with federal funding whose total costs exceed \$500 million). This guidance clarifies when a final NEPA approval can be issued in relation to specific transportation planning and air quality conformity regulations. Any Major Project, or operationally independent phase(s) of the project (preliminary engineering, final design, right-of-way, utility relocation, construction, and/or construction phases), which anticipates federal funding within the horizon of the LRTP must be included in the fiscally constrained portion of the plan and must be included in the conformity analysis for the area in the appropriate conformity analysis year as a prerequisite to NEPA approval (record of decision, finding of no significant impact, categorical exclusion). EWGCOG and the State DOTs are encouraged to closely monitor the NMRB and other potential Major Projects in the development of the next LRTP so that planning level analysis is adequately completed to allow for advancement of environmental determinations and other project development activities.

Recommendation #6 – The Review Team provides the following recommendations below that are intended to enhance plan development as well as the effectiveness of plan implementation.

A. The next update of the LRTP should consider multiple population, household, and employment projections and their underlying assumptions in an effort to illustrate how the

planning process evaluated and selected the preferred investment plan and forecasts. EWGCOG could use their technical capacity through the LEAM/Blueprint Model and other methods to analyze the costs and benefits under alternative scenarios for demographics, employment, and growth management. Results would demonstrate how different scenarios influence system efficiency and modal balance.

B. The next LRTP should include additional discussion on the methodology used to determine the projected transportation demand of persons and goods. Additionally, air quality conformity requirements call for the travel demand model to be reasonably sensitive to changes in the time(s), costs(s) and other factors affecting travel choices. Variables that could result in reduced demand under alternate scenarios including rising fuel costs, pricing schemes, and more efficient land use design/mix.

C. The next LRTP should enhance discussion of the management and operational strategies designed to improve the performance of existing transportation facilities in order to relieve vehicular congestion and maximize the mobility of people and goods. It is also recommended that the next LRTP update demonstrate that Transportation Control Measures (TCMs) have been considered to provide strategies both to reduce vehicle use and improve traffic flow. The LRTP should be transparent in how the aforementioned strategies are weighed, selected and implemented and should also demonstrate how M&O strategies compliment and implement the Congestion Management Process.

D. It is recommended that additional efforts are made to document the linkages between performance measures based upon the six focus areas (preservation, safety and security, congestion, access to opportunity, sustainable development, and goods movement) to the decision making process that results in the preferred investment plan. While it is apparent that these issues are significant considerations in program development and individual project selection, there is minimal documentation that assesses or quantifies the benefits and impacts of implementation of the investment plan. Beyond typical travel related measures, EWGCOG may also wish to consider analyzing the investment plan against quality of life measures such as per capita income/Wealth Index, Genuine Progress Indicator; Index of Social Health; Crime Index; Gross Regional Product, etc.

Congestion Management Process

Requirement: The National Highway System (NHS) Act of 1995 made the ISTEA requirement for all management systems optional, except for the Congestion Management System (CMS). SAFETEA-LU has redefined this requirement so that the planning process in a TMA includes a congestion management “process” instead of a “system”. The intent of this change is to reiterate the importance of the Congestion Management Process (CMP) to transportation planning and programming and to fully integrate this requirement into the TMA planning processes. The expectation is that the CMP should be an integral part of developing and linking a LRTP and TIP within TMAs. FHWA and FTA also seek a common set of performance measures and a common set of goals and objectives among the CMP, the LRTP, and transportation systems operational and management strategies. Additionally in air quality non-attainment areas, federal funds cannot be programmed for any project that will significantly increase carrying capacity for

Single Occupancy Vehicles (SOVs) unless the project results from a CMP meeting the requirements of the law. The CMP must include:

- Methods to monitor and evaluate the performance of the transportation system,
- A definition of parameters for measuring the extent of congestion and evaluating the effectiveness of strategies,
- A program for data collection and system performance monitoring,
- Identification and evaluation of operational and management strategies as well as travel demand reduction strategies,
- A schedule, identification of responsibilities, and funding source for implementation of strategies, and
- A process for periodic assessment of the implemented strategies.

Status: The development of the CMP is underway and EWGCOG has pledged to work closely with the planning partners to improve data collection and to utilize the information to improve management and operation of the transportation system.

The St. Louis region compares favorably with other urban areas in terms of travel time increases caused by congestion. Because of this, congestion is not often the predominate variable driving investment decisions. However, congestion is one of the most visible indicators of transportation system performance and it affects quality of life and carries significant economic costs. Travelers face congestion daily and it is perceived as a significant problem. As recognized in Legacy 2035, increasing spatial separation of land uses has facilitated the growth in traffic congestion and reduced the use of alternate travel modes. Delays tend to be worse for travelers living in an area of the region that requires traversing a major river crossing to reach their destination such as in Illinois, northern Jefferson County, and to a lesser extent in St. Charles County.

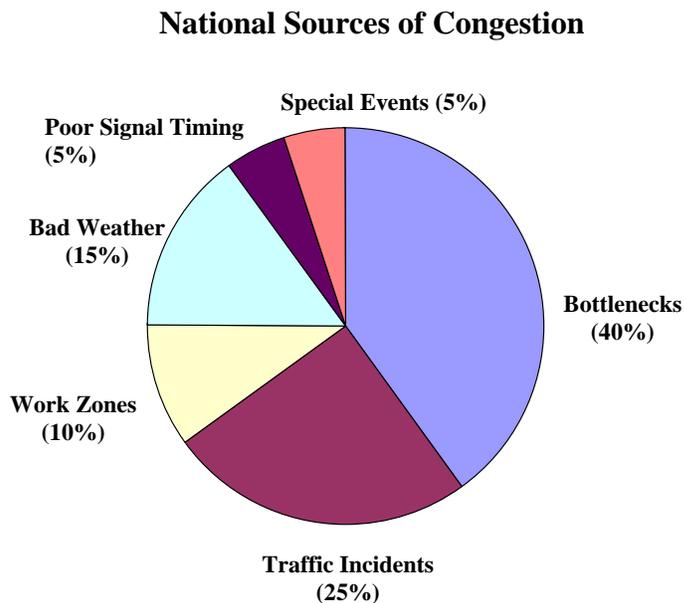
In response to recurring congestion, efforts began in 2006 to develop a Regional Arterial Management System (RAMS) to improve the operational efficiency of major arterials. Originally, there was a focus on Missouri due to MoDOT funding for the initiative but IDOT remained engaged to prepare for future expansion into Illinois. Protocols are currently being developed to carry out ongoing management under the title of the Gateway Green Light Project (GGL). A GGL Feasibility Study is in draft form and is the latest update to the 1997 CMS report. The draft report documents a series of workshops held with regional stakeholders to identify corridors that need signal coordination among multiple agencies.

The MPO has attempted to establish performance measures for the transportation system but have been hampered by issues concerning the reliability of data. EWGCOG staff indicate that a focus in the CMP development effort has been on establishing meaningful performance measures. Due to the closure of I-64, data collected throughout the network is currently skewed, sometimes severely, and will not present an accurate representation of travel demand for the duration of the project. The current closure of the western half of I-64 has re-routed approximately 150,000 vehicles per day and has put a focus on travel behavior, mode choices, and traffic flow. This focus has resulted in multi-agency coordination for alternative travel choices which has included additional lanes on I-44 and I-70 and coordination of signal

interconnects through St. Louis City and St. Louis County. Surveys conducted by the I-64 consultant HDR have indicated that there have been slight changes in mode split despite improvements to transit capacity from increasing Metro service frequency and the addition of new routes.

Finding: The metropolitan planning process is expected to complete the development of the CMP in 2009 and begin to actively implement the process in project development, prioritization, and evaluation. EWGCOG is expected to provide leadership in advancing CMP goals within the framework of the MPO as well as through participation in program development of the State DOTs, counties, municipalities, and transit providers.

Recurring bottlenecks in the transportation system is a critical component of a regional CMP and is historically the focus of most transportation planning and travel demand modeling efforts. However, a comprehensive approach is needed to explore all vulnerabilities in the transportation system to effectively attack regional congestion. Consequently, the CMP should include several types of strategies including the appropriate consideration and evaluation of:



Source: "Traffic Congestion and Reliability: Linking Solutions to Problems" 2004

- **Demand management measures** – A variety of strategies to manage demand and reduce single occupant vehicles (SOV) such as growth management and congestion pricing should be considered. Particularly in the St. Louis region with natural bottlenecks created by limited Mississippi River crossings, congestion pricing strategies should be studied to understand the price sensitivity of those that travel across the River and to identify potential alternate routes. Examples of other potential transportation demand management techniques can be found in the FHWA publication, *Mitigating Traffic Congestion – The Role of Demand-side Strategies*.
- **Traffic operational improvements** – Mobility and accessibility should be enhanced through the maintenance and optimization of the road network. In addition to existing locations of congestion, the entire horizon of the LRTP should be analyzed for a systematic prioritization of projects and based on asset management principles.
- **Public transportation improvements** – Efforts should seek to provide opportunities for existing transit services to be more competitive with SOV use, identify key transit corridors that could mitigate congestion, and to identify incentives for development that makes transit feasible.
- **ITS technologies** – Safety, efficiency, and reliability of the transportation system should be enhanced through the application of advanced technologies such as communications, sensors, and computing, to infrastructure and vehicles.

- **Where necessary, additional system capacity** – As travel demand increases, there are appropriate occasions to provide congestion relief through capacity expansion. Often, this type of relief is temporary and requires additional solutions for long term relief.

Recommendation #7 – While the development of the Congestion Management Process (CMP) is expected to be completed in 2009, it is recommended that the CMP be developed and adopted at the latest prior to the 2010 update of the Transportation Improvement Program (TIP). . The CMP should include regional definitions of congestion, identification of methods to monitor and evaluate system performance, a plan for data collection and performance monitoring, identification and evaluation of appropriate strategies, documentation of implementation plans for strategies, and establishment of a process for periodic assessment of implemented strategies. A robust CMP will provide a mechanism to enforce the MPO focus on system preservation and other regional goals by illustrating the benefits and costs of effective management and operation of the existing transportation network.

The CMP needs to document relevant performance measures to be able to monitor the effectiveness of implemented strategies. Measures should reflect both highway and transit modes with a preference towards mode-neutral measures (e.g. person throughput vs. vehicle miles traveled). Examples of potential performance measures are listed and described in the National Transportation Operations Coalition (NTOC) report titled *NTOC Performance Measurement Initiative* as well as US DOT draft guidebooks, *An Interim Guidebook on the CMP in Metropolitan Transportation Planning and Management and Operations in the Metropolitan Transportation Plan: A Guidebook for Creating an Objectives-Driven, Performance-Based Approach*. It is anticipated that the newly created EWG Research Department could be a valuable contributor towards development and monitoring of effective performance measurement data.

Recommendation #8 – It is recommended that newly developed CMP performance measures be reflected in the LRTP and TIP and these measures should be used to establish a formal prioritization process that identifies how strategies are chosen and how they can be implemented as part of project programming processes throughout the region. MPO project selection criteria for STP-S, STP-E, and CMAQ funding should be updated to reflect information and strategies described in the CMP and member agencies should strive to program their regionally significant projects, regardless of funding source, according to accepted CMP strategies and priorities.

Intelligent Transportation Systems

Requirement: In 2001, the Final Rule on Intelligent Transportation Systems (ITS) Architecture and Standards Conformity (Final Rule) and the Final Policy on Architecture and Standards Conformity (Final Policy) were enacted by FHWA and FTA respectively. The Final Rule/Final Policy ensure that ITS projects carried out using funds from the Highway Trust Fund including the Mass Transit Account conform to the National ITS Architecture and applicable ITS standards. This is to be accomplished through the development and maintenance of regional ITS architectures and using a systems engineering process for ITS project development

Status: The St. Louis Regional ITS Architecture was completed in 2005 consistent with the timeline established in the Final Rule for ITS Architectures. The Regional Gateway ITS is

operated by MoDOT while IDOT is connected through traffic control centers. There are a number of traffic control centers throughout the region. ITS systems have been deployed on Missouri interstates while Illinois has experienced less than full deployment due to a lack of funding. The next step is to extend ITS and management systems to arterials. ITS development and implementation on arterials has been challenging and consequently a large component of the work has focused on education. One arterial model that St. Louis officials have been attempting to emulate is the system that is being implemented in Kansas City.

A comprehensive update to the ITS Architecture was initiated during 2008. Through this work, the MPO has developed the philosophy that the actual architecture has become the by-product of the effort while the real success of the update has been the increased and improved communication between the regional ITS partners. The ITS update is also trying to incorporate information from the ongoing interoperable communications study. The ITS Update Committee is envisioning a regional workshop in the Spring of 2009 and the updated Architecture output by the Summer of 2009.

Finding: While the St. Louis Regional ITS Architecture satisfies the Final Rule and Final Policy, the timing is appropriate for a comprehensive update to the Architecture. The continued use of this framework should be utilized in making cooperative ITS investment decisions. It is anticipated that updates to the Architecture will continue to be needed periodically as ITS technologies and policies evolve.

EWGGOG and its member agencies are encouraged to ensure that the Architecture and individual ITS projects are implemented in concert with CMP and M&O initiatives. Data needs identified in the CMP can often be most efficiently met by implementing ITS deployment and therefore, these two aspects of the transportation planning process should be closely linked. ITS deployments and projects with ITS elements that also directly contribute to CMP data needs are encouraged to receive programming priority in order to serve these dual needs.

Transportation Improvement Program

Requirement: Federal legislation requires that an MPO cooperatively develop a TIP consistent with the LRTP and that it be financially constrained. The TIP must cover at least a four-year program of projects and must be updated at least every two years. The TIP must list all projects in sufficient detail as outlined in the regulations. Effective December 11, 2007, cost and revenue estimates must be produced in “year of expenditure (YOE) dollars” to reflect the time-based value of money. The TIP must reflect public participation and identify the criteria for prioritizing projects. The MPO must have an approved process for making changes to the TIP. FHWA and FTA must jointly find the TIP to be based on a continuing, comprehensive, and cooperative transportation process. In air quality nonattainment areas, a conformity determination is required to demonstrate that the total emissions projected for the TIP are within the emissions limits (“budgets”) established by the State Implementation Plan. Only after an MPO TIP is amended into the Statewide Transportation Improvement Program (STIP), can funding for projects be authorized. While it is not specifically related to TIP requirements, this section also provides discussion on the potential planning and programming impacts of expanded use of the Design-Build project delivery technique as employed on the I-64 reconstruction project.

Status: FHWA and FTA approved the amendment of the current FY 2009-2012 TIP into the Missouri and Illinois STIPs on September 3, 2008 and September 23, 2008 respectively. In Missouri, MoDOT's FY 2009-2012 program contains 205 projects at a total cost of \$952 million while the local program contains 221 projects at a total cost of \$382 million (\$265 million in federal funding). In Illinois, IDOT's FY 2009-2012 program contains 67 projects at a total cost of \$468 million while the local program contains 98 projects at a total cost of \$158 million (\$85 million in federal funding). The regional program of transit projects for FY 2009-2012 contains 180 projects at a total cost of \$418.4 million. The TIP commits 43% of the total program towards system preservation in the form of reconstructing roads, repairing/replacing bridges, and replacing other aging facilities. Nearly 24% of the total program is allocated to adding capacity although much of this total can be attributed towards the new Mississippi River Bridge. Projects to improve operations and/or safety account for 12% of the total program.

The proposed federal funding levels for the entire program do not exceed the funds anticipated by the MPO to be available in the various program years and funding categories. These revenue estimates take into account that funding appropriations will be less than SAFETEA-LU authorized amounts by projecting obligation limitation based on previous years' limitations. To the greatest extent possible, project sponsors incorporate inflation factors into the cost estimates for their projects that are expected to be implemented beyond the first year of this TIP. Written certification is received from each of the local implementing agencies indicating that nonfederal matching funds are available for their respective projects. Within the TIP, the MPO also certifies that requirements for financial capacity analysis have been satisfied for FTA Section 5309 and Section 5307 programs.

Due to concerns regarding the timely implementation of Local Public Agency (LPA) projects programmed in the TIP, the MPO adopted a policy of Reasonable Progress. For projects or programs in the TIP, reasonable progress is satisfied if the project has advanced to the point of obligating all federal funds programmed for that project in the current fiscal year, regardless of the phase of work (PE, ROW, PS&E/Construction). If a project fails to obligate the programmed federal funds by September 30 of the current year, the funding is forfeited and returned to the regional funding pot. Actual progress toward implementation is measured against the schedule submitted by the project sponsor in the project application. A formalized project monitoring and tracking process provides input to project sponsors throughout the year to ensure that project status is well documented. The Reasonable Progress policy has increased the number of programmed projects which are implemented in a timely manner.

Finding:

Local Revenue Estimate

Federal transportation planning regulations require an MPO to describe the local revenue source(s) (i.e. 1/2 cent sales tax, City of John Doe Special Road District, etc.) anticipated to be available to implement LPA sponsored Federal-aid transportation projects that are programmed in the TIP. This local funding source description needs to be a part of the demonstration of fiscal constraint at the time of the TIP update and at the time of TIP amendments to add new LPA sponsored projects to the TIP. The EWGCOG does not require local project sponsors to

identify a specific local funding source at the time the sponsor submits a project for inclusion in the TIP.

Cost Estimating

The EWG is encouraged to provide additional detail concerning the inflation rate(s) utilized in the TIP. It is preferable for a consistent rate based on reasonable financial principles to be utilized for projects regardless of implementer. The agreed upon rate should be cooperatively developed by the States, MPO, and public transit operators. Formal US DOT guidance (most recently issued July 1, 2007) provides an accepted inflation rate (4% for planning level cost estimates) that may be used to initiate this discussion among project implementers.

Operation and Maintenance

The Federal transportation planning regulations require an MPO, in developing the TIP, to document system-level estimates of cost and revenue sources that are reasonably expected to be available to adequately operate and maintain Federal-aid highways and public transportation. The EWGCOG does not require local project sponsors to document cost and revenue estimates for the local public agency to adequately operate and maintain locally owned Federal-aid highways and public transportation.

Advanced Construction

Federal transportation planning regulations specifies that a SDOT Advanced Construction (AC) project application may be approved "...only if the project is included in the STIP." MoDOT and IDOT's AC projects, located within the St. Louis metropolitan planning area, must be incorporated into the EWGCOG's TIP. Because AC does not constitute a commitment of Federal funds to a project, the financial plan and/or funding information for the TIP and STIP, respectively, need to demonstrate sufficient non-Federal revenues to provide 100 percent funding for the projects listed as "AC" in the TIP and/or STIP. The EWG TIP does not incorporate and illustrate planned and managed MoDOT or IDOT advance construction projects.

STIP Modifications

Amendments require public review and comment, demonstration of fiscal constraint, and an air quality conformity determination (when applicable). Administrative modifications allow minor changes without such actions. The next TIP should clearly articulate and document the differences between an "amendment" (major revision) to the TIP versus an "administrative modification" (minor revision).

The FY 2009-2012 TIP (and the other TIPs approved since the last certification review) meets the requirements in the planning regulations.

Recommendation #9 – It is recommended that that the financial analysis in the EWG TIP include:

A. The narrative demonstration of system level estimates of revenues and costs for local public agencies (LPAs) to adequately operate and maintain LPA owned federal-aid routes and public transportation systems. This documentation of O&M needs to be part of the next TIP update.

B. The documentation of the local revenue sources, anticipated to be available to implement LPA sponsored Federal-aid transportation projects, in TIP financial section. This documentation of local revenue sources to be part of the next TIP update.

Recommendation #10 – It is recommended that each SDOT clearly define and consistently illustrate which projects will utilize the cash flow technique Advance Construction (AC) which allows states to initiate projects with state funds and later convert these projects to federal assistance. An AC project should be included in the TIP at two different points in time: (a) as State or local funds prior to the initial authorization of the AC project (including demonstration that adequate State funds are available to "front" the cost of the project) and (b) prior to the authorization of the project to convert it from AC to a Federal-aid funding program (including a demonstration from the State that this conversion maintains fiscal constraint with other Federal-aid projects). Therefore, in the year of an AC project's conversion, the amount of the project is considered as both a State revenue source and a Federal-aid debit.

Recommendation #11 – Each State DOTs is expected to coordinate with EWG to devise a timeline that ensures the MPO an appropriate opportunity to review and comment on the respective state programming processes at an early enough stage to provide meaningful input prior to State submittal for inclusion into the TIP.

Design-Build for I-64 Reconstruction

Status: Design-Build focuses on combining the design, permit, and constructions schedules in order to streamline project delivery and implementation. Necessary legislation allowing Design-Build for the I-64 reconstruction project was passed in 2002. Utilizing Design-Build on a major artery reconstruction such as I-64 through Missouri presents enormous challenges but also offers tremendous opportunities for time and cost savings. From a time and cost perspective, the I-64 project appears to be successful and may encourage MoDOT to expand the use of Design-Build in future programs. However, while the EWGCOG Board of Directors approved MoDOT's proposal to advance a Design-Build approach, local leaders have expressed frustration with the process and have indicated that there has been a subsequent lack of transparency and local involvement in the contractor selection, traffic mitigation plan, construction phasing and work plan, and final design decisions.

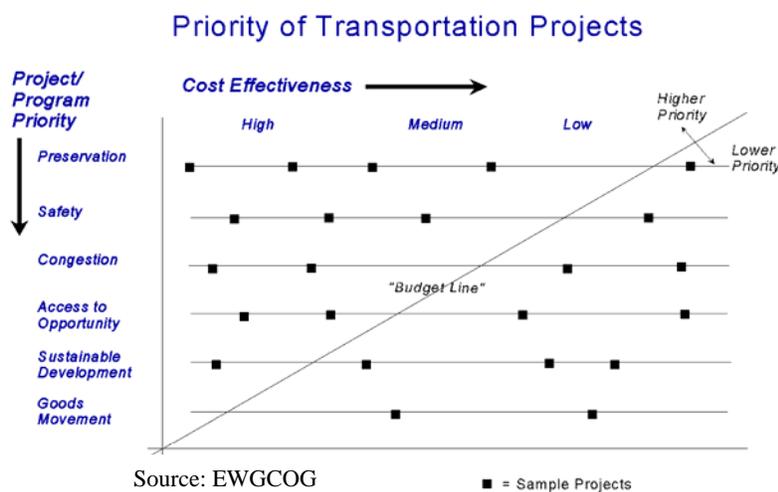
Finding: While Design-Build has demonstrated success in timely and cost effective project development and implementation, the technique is not appropriate in all circumstances. Great care must be taken by project implementers to ensure that Design-Build remains a collaborative, open process. This participation process is particularly important in metropolitan areas where planning and environmental processes are structured to be based on cooperative decision making. It is recommended that as the I-64 reconstruction nears completion, MoDOT and the St. Louis TMA planning partners formally discuss the successes of the project as well as future

strategies to enhance transparency of decisions and involvement of the public and local officials through in a Design-Build process.

Project Selection

Requirement: All projects except those funded by NHS, Bridge, Interstate Maintenance, and Federal Lands Highway programs must be selected by the MPO in consultation with the State and transit operator from the approved metropolitan TIP. Projects from the NHS, Interstate and Bridge programs are selected by the State in cooperation with the MPO. The first year of an approved TIP constitutes an agreed list of projects and does not require further action from a project implementer. If the implementer desires to proceed with a project in the second, third, or fourth year, they must follow procedures agreed to by the MPO, State and transit operators.

Status: Projects are selected for implementation from the first year of the TIP in accordance with the provisions outlined above. Projects implemented from the second, third, or fourth year of the TIP have been acted upon as necessary.



EWG has a documented project selection process for the programming of CMAQ, STP-S, and STP-E (Missouri only) funds that are administered by the MPO. Each of these processes favor setting a priority list of projects based on cost effectiveness and the project's priority as defined by the LRTP. As projects are selected from these processes for inclusion in the TIP, they become subject to the MPO policy on Reasonable Progress.

Finding: While EWGCOG has fulfilled the requirements of this section of regulation, there are opportunities to enhance the investment decision making process.

Regardless of total funding amounts or the sources of those funds, EWGCOG has a responsibility to work aggressively to develop regional consensus on transportation planning priorities and to see that efforts are made to implement those priorities.

Recommendation #12 - The MPO is not responsible for producing capital improvement programs of member agencies, but the MPO should strive to ensure that those programs are in concert with each other and advancing agreed upon priorities. Likewise, the MPO should be able to provide analysis to its members on the impacts that their independent capital improvement programs are having individually and collectively on system performance.

US DOT emphasizes that system-wide performance measures need to be further developed, refined, strengthened by improved data, and applied to the transportation planning process through the LRTP, TIP, CMP, and other products and processes. This information will provide a better understanding of how the existing system is operating and what effect future transportation investments will have on the overall regional network. Ultimately these performance measures should be incorporated into the accepted criteria for project selection by not only the MPO in allocation of STP-S, STP-E, and CMAQ funds, but by member agencies including the State DOTs and transit providers as meaningful criteria that helps drive their independent investment decisions.

Annual List of Obligated Projects

Requirement: Federal law requires publication of an annual list of obligated projects within 90 days following the end of the reporting year. *Obligated projects* means strategies and projects funded under 23 USC and 49 USC for which the supporting Federal funds were authorized and committed by the State or designated recipient in the preceding program year, and authorized by FHWA or awarded as a grant by FTA. The annual listing must be a cooperative effort of the MPO, State, and transit operator and information must include an adequate description of project scope, the location and limits of the project, the original amount programmed and the amount actually obligated. It is also encouraged that visualization techniques be applied to this publication to promote an improved understanding of transportation programs. Emphasis has been added to the inclusion of investments in pedestrian walkways and bicycle facilities. The listing must be published or otherwise made available in accordance with the MPO's public participation criteria for the TIP.

Status: The Annual List of Obligated Projects covers a twelve month period and provides rudimentary project and funding information. Highway information is provided in different formats for each state and transit data is provided in different formats. There are no attempts to identify investments in bicycle or pedestrian facilities outside of what information may be provided in the project descriptions. There are no attempts to include visualization techniques. The Annual List is not provided in the draft TIP as the reporting period has not closed at that time but rather is included in the production of the approved TIP.

Finding: The Annual List of Projects produced for the period from July 1, 2007 through June 30, 2008 and included in the Appendix to the FY 2009-2012 TIP meets the minimum requirements of law but is of minimal value towards understanding and analyzing the use of financial resources.

The current presentation of the Annual List is not effective for a number of reasons. Data provided in budget codes and fund codes are likely of nominal value without some explanation of the terminology used. Project descriptions are often incomplete or unclear and the limits of the projects are often not included. Additional narrative concerning the distinctions between federal funds programmed and obligated and why these figures could be significantly different would also be beneficial. Furthermore, a map illustrating locations of obligated projects should be included in this publication as a minimum attempt to provide visualization of the provided information.

EWGCOG is encouraged to consider publishing the Annual List separately from the TIP within the given 90 day allowance from the close of the reporting period. It is anticipated that this publication would receive additional personnel time and resources outside of the regular TIP development process which would likely allow for improved reporting.

Recommendation #13 – It is recommended that the MPO re-evaluate the goals and process for producing the Annual List of Obligated Projects. This publication should be used as opportunity to document the successes of the planning and project development processes as well as demonstrating effective stewardship of federal funds.

Air Quality Conformity

Requirement: Under the 1990 Clean Air Act Amendments (CAAA), the US Department of Transportation cannot fund, authorize, or approve federal actions to support programs or projects, which are not first found to conform to the Clean Air Act requirements. With DOT concurrence, the US EPA has issued regulations pertaining to the criteria and procedures for transportation conformity. As it pertains to metropolitan planning, the conformity regulations require that in nonattainment areas there be a consultation process in effect involving appropriate local, state, and federal air agencies, and agencies charged with transportation planning. The FHWA and the FTA jointly make conformity determinations within air quality non-attainment and maintenance areas to ensure that federal actions conform to the "purpose" of State Implementation Plans (SIPs). The transportation conformity process is intended to ensure transportation plans, programs, and projects will not create new violations of the National Ambient Air Quality Standards (NAAQS); increase the frequency or severity of existing NAAQS violations; or delay the attainment of the NAAQS in designated non-attainment (or maintenance) areas.

Status: The St. Louis TMA is classified as nonattainment with tropospheric ozone (moderate) and particulate matter (PM 2.5) NAAQS. Jersey County, Illinois is included within the ozone nonattainment boundary and Baldwin Township in Randolph County, Illinois is included within the PM 2.5 nonattainment boundary.

The region has an established consultation process that consists of regular monthly meetings of the Air Quality Advisory Committee (AQAC) and the Inter-Agency Consultation Group (IACG). AQAC represents a broad range of environmental interests ranging from all levels of government to advocacy groups. Through AQAC meetings, EWGCOG staff coordinates and facilitates air quality planning activities between Illinois and Missouri agencies and assists the states in preparing necessary revisions to the mobile source components of SIPs. IACG is comprised of EWG and federal and state transportation and air quality partners. One of the primary functions of IACG is to coordinate planning assumptions and data collection between EWGCOG, the Missouri Department of Natural Resources (MoDNR), and the Illinois Environmental Protection Agency (IEPA). Other items considered by the IACG include LRTP/TIP updates, planning assumptions for regional emissions analysis, test to be performed as part of the Conformity process, emissions budgets and base year inventories, and review and comment of Conformity Determinations. All decisions by the IACG are reached through consensus.

While fully supporting the goals of air quality planning and fully endorsing the effectiveness of the consultation process, the MPO, through its staff, has been candid in its concerns regarding the significant amount of time and resources dedicated towards the highly technical components of modeling and conformity analysis. EWGCOG suggests that improvements to fuel composition, vehicle technology, and the rapid growth of hybrid vehicles are the dominant variables responsible for dramatic reductions in estimated motor vehicle emissions. It is the staff's position that emission reductions through a decline in vehicle miles travelled will only likely be sustained through coordinated transportation and land use planning and significant investments in transit and other environmentally friendly modes of travel.

US DOT has recently initiated efforts to engage MPOs in looking beyond NAAQS and to consider what contributions the planning process could make towards mitigating climate change. Climate change refers to unstable weather patterns caused by increases in the average global temperature. There is a consensus among climate scientists that these changes result from atmospheric concentrations of CO₂, methane (CH₄), nitrous oxide (N₂O), and other heat-trapping gases. These greenhouse gases (GHGs) are so-named because they simulate the effect of a greenhouse and form a blanket of pollution that stays in the atmosphere which traps heat and contributes to an increase in the earth's temperature. GHGs may be the fundamental cause of sea level rise and climate instability characterized by severe weather events such as storms, droughts, floods, and heat waves. Impacts on transportation could include damage inflicted upon infrastructure, such as flood damage to road, rail, and bridges. Additionally, the economic costs of interruptions in the operation of the transportation systems could be significant from these types of disasters by preventing employees from reaching work, shoppers from travelling to stores, and goods from being delivered.

As previously mentioned, the MPO administers a project selection process for the programming of CMAQ funds that involves agencies at the local, state, and federal levels. Project sponsors must be public agencies and are responsible for submitting projects to EWGCOG according to adopted guidelines. Emission reduction estimates are required for every submittal and consideration is provided to short range and long term SIP objectives. EWGCOG staff lead a project evaluation process that includes a review of eligibility, emissions reduction analysis, proposed funding availability, and the availability of financial resources other than CMAQ funds. Cost effectiveness of each proposal is then developed to compare all proposed projects by the common standard of cost per unit of benefit. The Missouri TPC reviews project rankings from EWGCOG prior to submitting a proposed CMAQ program to the Board of Directors while the Illinois TPC only takes similar action after locally sponsored projects receive review from committees of elected officials established in each of the three counties. The current FY 2009-2012 TIP has programmed CMAQ projects through FY 2010.

Finding: Air quality conformity requirements have been adequately satisfied since the last certification review. A conformity determination has been successfully made for the St. Louis region with the approval of Legacy 2035 and annually with the adoption of a new TIP.

Recommendation #14 – The MPO should engage in discussion and closely monitor potential regulation of greenhouse gases for the purposes of mitigating the threats of climate change. While there may be general recognition of the threat that climate change poses to transportation

infrastructure, it is understood that many of the potentially most effective GHG mitigation strategies (such as fuel efficiency, alternative fuels, and land use) are outside the direct influence of the MPO. The principle role of the MPO in the short term should be to begin the process of developing support from key partners on broadly accepted GHG reduction goals and strategies.

There will be many obstacles towards effectively planning for climate change but the threats to quality of life and transportation systems from inaction could be severe. Quantifying GHG emissions from transportation plans will unquestionably be one of the most challenging technical components of integrating climate change into transportation planning. Some of these challenges would include:

- There are often inconsistencies between the transportation components of a state-level GHG inventory and forecast (based on sales data) and a metropolitan level GHG inventory and forecast (based on VMT from a travel demand model).
- There are uncertainties regarding the appropriate geographic scale for estimation of project level GHG emissions.
- Current EPA emissions models are not well suited for analysis of the GHG impacts of transportation plans.
- Given the importance of a life-cycle approach to GHG emissions analysis, there is uncertainty regarding the need to estimate emissions resulting from transportation system construction and maintenance, as opposed to system use.

While improved integration of transportation and land use planning is a commonly suggested short and long term strategy to minimize GHG emissions, numerous regions throughout the country such as St. Louis do not have the necessary legal authority or the political culture to effectively integrate regional land use planning into local development decision making processes. Other transportation focused strategies such as road pricing and substantially improved transit systems face a variety of political and financial barriers. The principle role of the MPO in the short term should be to begin the process of developing support from key partners on broadly accepted GHG reduction goals and strategies. As a uniquely regional voice for the St. Louis region, EWGCOG is encouraged to assemble and cultivate a diverse collection of stakeholders in drafting a climate action plan for the purpose of identifying these goals and politically viable strategies for mitigating GHG emissions. The guidance, technical assistance, and leadership of the States will also be crucial for effective climate change efforts to advance.

Public Participation

Requirement: Federal legislation requires that the transportation planning process include a proactive public participation process that provides complete information, timely public notice, full public access to key decisions and supports early and continuing involvement in plans and programs. This process is required to facilitate public participation for a list of interested parties that includes:

- Citizens
- Affected Public Agencies
- Representatives of Public Transportation Employees

- Freight Shippers
- Providers of Freight Transportation Services
- Private Providers of Transportation
- Representatives of Users of Public Transportation
- Representatives of Users of Pedestrian Walkways and Bicycle Transportation Facilities
- Representatives of the Disabled
- Other Interested Parties

Additionally, it is required that a documented public participation plan is developed in consultation with all interested parties. The participation process must demonstrate explicit consideration and response to public input and it must seek out and consider the needs of those traditionally underserved by existing transportation systems. Its effectiveness must be periodically reviewed and assessed by the MPO. The metropolitan public participation process must also be coordinated with the statewide public involvement process. In carrying out the public participation process, the MPO is expected to hold any public meetings at convenient and accessible locations and times, employ visualization techniques to describe plans and programs, and to make information available in electronically accessible formats and means, such as the World Wide Web.

Status: The current EWGCOG Public Involvement Process (PIP) plan was adopted in June, 2007. The plan provides an overview of the agency, the challenges of effective public participation, the goals of the agency, levels of involvement, and staff training.

EWGCOG presents materials concerning the LRTP, TIP, or other aspects of the planning process at many different types of community events in many different locations. EWGCOG produces several publications to provide information to several segments of the community including *Local Government Briefings*, the *Where We Stand Update* newsletter, and the *Gateways* newsletter. Additional publications have included specific attempts to summarize the planning process or portions of the planning process in non-technical terms for easier consumption for the general public.

The EWGCOG Board of Directors includes several elected officials as well as five members deemed as “Regional Citizens” who are individuals appointed to provide public input from their respective jurisdictions. EWGCOG committee membership tends to represent broad cross-sections of the region and genuinely attempts to represent a variety of interests. Staff indicates that public participation will be further enhanced in the coming year by the creation of a community involvement advisory group.

Finding: The MPO is providing a proactive public participation process that satisfies requirements for metropolitan transportation planning. EWGCOG commits a broad array of staff, GIS, web, marketing, research, and planning resources to participation and outreach efforts. EWGCOG should be commended on a number of initiatives that have and will continue to improve the planning process through increased public interaction such as the Where We Stand research series, MetroLink corridor study meetings, and diversifying feedback techniques. Nevertheless, there are areas where opportunities exist for improvement.

Coordinating public involvement in a large metropolitan area can be a daunting and difficult task with numerous types of activities being conducted throughout many different segments of the region. As such, there can be a tendency in large metropolitan areas for the public involvement process to become compartmentalized and somewhat fragmented in nature. It appears that EWGCOG has largely avoided these concerns through close coordination between staff in the Community Engagement and Local Government Services section and the other sections within the Transportation Planning and Community Planning departments. Close coordination will continue to be necessary so that public participation initiatives are not disconnected from traditional MPO activities such development of the LRTP and TIP as well as other issue based activities such as safety conscious planning, environmental consultation, and implementation of the coordinated human services transportation plan.

The PIP would benefit from additional specificity. The PIP identifies and discusses different levels of community participation including public information, consultation, involvement, collaboration, and empowerment. It would be helpful to provide some examples of what aspects of the transportation planning process are appropriate for these different levels of participation. Likewise, EWGCOG has articulated the characteristics of successful public participation well, but has not provided any specifics on how progress towards these outcomes can be monitored or evaluated. Because the PIP itself should be a tool to provide direction and guidance to those seeking participation with the planning process, EWGCOG should consider providing the PIP a more prominent web presence such as a link from the agency's main page.

It is important that EWGCOG continues to ensure the availability of alternative or accessible formats as needed for all public materials. This should include multilingual formats for those populations with limited English proficiency as well as formats for the visually impaired. The EWG should develop either a stand-alone Limited English Proficiency (LEP) plan or include an LEP plan in the MPO's Title VI Plan/Policy.

EWGCOG should strive to keep their web site current. While the EWG home page has recently been updated and streamlined, further exploration into the site presents some limitations. Certain initiatives such as the Gateway Blueprint and the Travel Safe program have had no apparent updates for the last several years. Similarly, most committees have posted meeting agendas and minutes but some have not been updated for several years which may give the impression that the committee is no longer active.

Certain planning efforts such as youth alcohol awareness education, MetroLink corridor analysis, or even the LRTP update could benefit from a presence on social networking web sites. This type of contemporary outreach could potentially engage teenagers and young adults who tend to respond effectively to nontraditional media formats.

Visualization techniques have been utilized well within the planning process and specifically, the Great Streets digital planning guide deserves considerable praise. EWGCOG is encouraged to continue examination of web based tools for interactive TIP mapping.

Recommendation #15 – It is recommended that the current Public Involvement Process (PIP) plan be updated for the purpose of incorporating goals and the description of explicit procedures,

strategies, and desired outcomes for the ten listed areas called out in 23 CFR 450.316 (a). This update effort must be developed in consultation with all interested parties.

Title VI of the Civil Rights Act

Requirement: Title VI of the Civil Rights Act of 1964 states that no person in the United States shall, on the basis of race, color, or national origin, be excluded from participation in, be denied the benefits of, or subjected to discrimination under any program or activity receiving federal financial assistance. Title VI prohibits intentional discrimination as well as disparate impacts on protected groups. The transportation planning regulations require consistency with Title VI and subsequent civil rights laws and regulations. For the purposes of this certification review, the products of the planning process must reflect compliance with this Act.

Status: Protected populations identified by EWG in the St. Louis transportation planning process include minorities, persons in poverty, zero car households, seniors in zero car households and the disabled. High concentrations of persons in protected populations can be seen in north St. Louis City; East St. Louis Illinois; communities in St. Louis County that adjoin the City, such as Wellston and Pagedale; and communities in Madison and St. Clair Counties surrounding East St. Louis, such as Washington Park, Brooklyn and Venice. Other than Monroe County, every county in the region has at least one census block group with a high concentration of persons in protected populations.

EWGCOG enjoys relationships with many of the transportation and social service agencies responsible for providing services and access for underserved populations throughout the region. Specific outreach efforts have been made with senior staff of organizations such as the International Institute, the Urban League, OASIS, and Metropolitan Congregations United to discuss opportunities for outreach to the groups for which these organizations advocate. Partnerships with groups like the Starkloff Disability Institute and Paraquad have improved understanding of the needs of the disabled and resulted in EWGCOG contracting with Starkloff to publish *Access to Independence – Transportation Services for People with Disabilities in the St. Louis Region*.

Legacy 2035 discusses the challenges endured by those with mobility limitations or cannot afford an automobile resulting from the region's decentralized pattern of development. While not unique to the St. Louis region, development in this fashion has created a barrier that limits access to many types of opportunities throughout the region. In order to respond to these challenges, the planning process provides emphasis on analysis of public transit, paratransit, compliance with the Americans with Disabilities Act (ADA), access to services, and access to jobs. Legacy 2035 also acknowledges that these issues not only affect the lives of protected populations but also have a significant impact on the region's economic vitality from suburban firms not being able to access necessary workforces to sustain their businesses.

Title VI certifications are made annually in the EWGCOG TIP through the self certification process. Furthermore, individual transit operators are reviewed for Title VI compliance during their triennial reviews with FTA. There are currently no formal Title VI complaints related to transportation in the St. Louis metropolitan region.

Finding: EWGCOG has demonstrated significant effort to consider Title VI protected populations throughout the planning process. However, the growing spatial mismatch between workforces and residents in the urban core and jobs and services on the urban fringe will demand that special attention is focused on equity in developing, maintaining, and providing transportation facilities and services. Additionally, the potential of drastic reductions in service by Metro resulting from the defeat of Proposition M also places considerable attention to issues of mobility and equity. Therefore, EWG is encouraged to make further efforts in the assessment and documentation of how transportation plans and investments affect these protected populations. Specifically, it is recommended that the MPO consider providing an overall assessment of how the transportation planning process approaches and works towards compliance with relevant laws and executive orders. EWGCOG should build upon their substantial foundation of demographic and socioeconomic analysis as well as their wealth of data concerning transportation investments in the region so that the planning process can document the conclusion that traditionally underserved populations are not being neglected or discriminated against by the MPO directly, its individual members, or by the region collectively on a broader scale.

Recommendation #16 - It is recommended that EWGCOG develop a formalized Title VI Policy that outlines the roles and responsibilities for prompt processing and disposition of Title VI complaints received by EWG in connection with all projects (local & MoDOT sponsored).

Americans with Disabilities Act

Requirement: The Americans with Disabilities Act (ADA) gives civil rights protections to individuals with disabilities. It ensures equal opportunity for individuals with disabilities in public accommodations, employment, transportation, state and local government services, and telecommunications. In transportation, the fundamental issue is one of access to transportation services and facilities. ADA requires all public transit systems that provide fixed route bus and rail service to also provide paratransit (usually vans and small buses) service for people with disabilities who cannot use the fixed route bus and train service.

Status: The FTA has certified in their most recent triennial reviews that Metro and Madison County Transit meet the requirements of ADA. The EWGCOG offices are ADA accessible and all of their meetings, hearings, and public review sites in the region are ADA accessible.

EWGCOG routinely attempts to consider the needs of individuals with disabilities in the planning process, particularly as they relate to access to jobs and services through transit, paratransit, and pedestrian accommodations. Additionally, EWGCOG has worked with transit providers and local governments to improve the percentage of the region's approximate 9,000 bus stops that are ADA compliant.

Finding: The ADA requirements of the transportation planning process have been satisfied.

Coordinated Human Services Transportation Plan

Requirement: SAFETEA-LU requires that proposed projects under three FTA formula funding programs including Special Needs of Elderly Individuals and Individuals with Disabilities (5310), Job Access and Reverse Commute (5316), and New Freedoms (5317) must be derived from a locally developed coordinated public transit-human services transportation plan (CHSTP). This plan must be developed through a process that includes representatives of public, private, and non-profit transportation and human services providers, as well as the public. Local officials are to determine the appropriate lead for developing the plan which can be, but is not required to be, the MPO. Preparation of the plan should be fully coordinated and consistent with the metropolitan transportation planning process.

Status: Representatives from more than 140 public, private, and non-profit agencies, and known advocates of public transit from the general public—representing both transportation and human service providers in Missouri and Illinois—were invited to participate in the development of the CHSTP. A Stakeholder Group was derived from these invitees and met for ten months concerning regional demographics, system assets, unmet needs and gaps in service, strategies for establishing funding priorities, and a competitive process for selecting projects. A draft plan was compiled and went through nine public meetings to solicit additional community input and comment on the needs, strategies, and priorities identified in the draft CHSTP. The EWGCOG Board of Directors adopted the CHSTP on April 20, 2008. A solicitation for Job Access and Reverse Commute (JARC) and New Freedoms has been conducted utilizing the strategies and process outlined in the CHSTP. The 5310 program in Missouri has also been selected using the plan.

Finding: The requirements for the CHSTP have been satisfied. The appropriate transportation providers, stakeholders, and the public have been involved in the planning activities that led to the final CHSTP document. The plan identifies transportation providers and provides details of existing services. The plan also evaluates the adequacy of those services in relation to identified disadvantaged population and those with special needs. The CHSTP provides strategies or activities concerning how transportation deficiencies such as gaps and duplication of services can be addressed. The plan also provides a scoring system to evaluate proposed projects using a competitive selection process.

Self Certification

Requirement: The MoDOT, IDOT and EWGCOG must certify to FHWA and FTA, concurrent with the submittal of the EWGCOG'S annual TIP update and at least every four years, that the metropolitan planning process is addressing the major issues facing the area and is being conducted in accordance with all applicable transportation planning requirements.

The FHWA and FTA must jointly review and evaluate the metropolitan planning process in TMAs at least every four years. This review is for the purpose of certifying that the process is meeting the requirements of 23 CFR Part 450.

Status: EWGCOG submits its self-certification to the federal agencies near the beginning of its fiscal year as part of the TIP submittal process. The EWGCOG'S self-certification is done in conjunction with the Board of Director'S approval of the TIP. The certification form is signed by

the Board of Director's Chairman, the MoDOT District Engineer and the IDOT Deputy Director of Highways. The executed self-certification document is incorporated into the TIP.

Finding: FHWA and FTA have accepted each of EWGCOG self-certifications since the last federal certification review.

Recommendation #17 – It is recommended that the MPO strive to substantiate provisions of the annual self-certification and document the performance of the metropolitan planning process. Documentation can occur through the self certification process itself or if more applicable, through strategic planning and performance monitoring of safety, congestion, air quality, public participation and many other transportation planning issues.

Disposition of 2004 Review Findings

The report documenting the previous transportation planning certification review findings was issued on November 19, 2004. FTA and FHWA certified the planning process and issued no corrective actions and delivered thirteen recommendations for improvements to the planning process. The Review Team notes the status of these thirteen recommendations as follows:

1. The existing 1972 MOU between the EWGCOG, MoDOT and IDOT for the purpose of insuring continuity in the comprehensive and coordinated urban transportation planning process for the St. Louis Metropolitan Region does not meet the requirements of 23 CFR 450.310 (a). These principals in the metropolitan planning process are directed to realize cooperative planning agreement(s) consistent with 23 CFR 450.310 on or before December 1, 2005. We encourage, to the extent practical, that these entities engage in one agreement outlining their respective roles and responsibilities within a cooperative planning process. However, the fact that a recently updated new MOU between EWGCOG and MoDOT is in place opens up the possibility of a new and separate agreement being developed by EWGCOG and IDOT. Though not an approach preferred by the team, it represents an agreement scenario that may still satisfy regulatory “agreement” requirements while ensuring that the EWGCOG, MoDOT and IDOT planning and programming processes will be carried out in a comprehensive, cooperative and coordinated manner. The absence of an executed agreement that includes IDOT, within the time frame and fashion called for in this recommendation, will result in the review team withdrawing this finding as a recommendation and re-issuing a corrective action.

This recommendation has been implemented. The MPO operates under two agreements for metropolitan planning that have been approved since the last Certification Review. The Missouri portion of the region is predominately administered by a Memorandum of Understanding (MOU) between EWG and the Missouri Highway and Transportation Commission (MHTC). This MOU was most recently updated and signed in 2004. Transit providers and the Illinois portion of the region operate under a cooperative agreement between EWGCOG, IDOT, Metro, and the Metro-East Transit Districts. This cooperative agreement was most recently updated and signed in 2007.

2. To ensure adherence with Federal requirements given under 23CFR Part 420.111 relative to showing cost estimates for each work activity and for the purpose of providing complete information to the public, EWGCOG needs to have the UPWP illustrate cost estimates and/or staff hours dedicated to major work activities that appear in the current UPWP document format as lettered headings within a coded and more broad work element.

The UPWP provides summary funding and expenditure charts that detail revenue and cost estimates for each work element. Additional charts provide sources of federal funds and amounts of matching funds by state and fund type as well as the amounts and sources of other local funding. The narrative sections provide a cost estimate for each “work element” but not for each individual work activity that is listed within each work element. Following the 2004 Review, the EWG began show a cost estimate for all major work activities that appeared as

lettered headings within a coded more broad UPWP work element. However, this practice was not reflected in the FY2009 UPWP.

To ensure adherence with Federal requirements given under 23CFR Part 420.111 relative to showing cost estimates for each work activity and for the purpose of providing complete information to the public, the EWGCOG needs to continue this practice for the FY2010 UPWP.

3. We recommend that EWGCOG include a brief description of the source of “other” local funds the UPWP’s “New Funding Summary Chart”, as a heading or as a footnote to the chart.

This recommendation has been implemented. The UPWP now provides a chart for supplemental funding information that identifies the source of other local funding.

4. We recommend that EWGCOG continue to implement CMS strategies and analyze performance measures as part of the regular planning process and as part of the Long Range Plan update. The CMS Handbook, developed in 1997, is a tool to assist in the implementation of these strategies. We recommend that EWGCOG update this handbook, which is outdated.

The EWGCOG informed the 2004 Federal Review Team during the on-site segment that they did not feel the need to update the 1997 CMS handbook because they did not believe that congestion was a problem in the planning region. In response to the Review Team’s 2004 recommendation, EWG informed the 2004 Review Team that they would continue to evaluate and implement CMS strategies in their regional, corridor, and subarea planning processes, as well as in the programming process, and will continue to evaluate and report on system performance measures. They also advised the 2004 Review Team that they would initiate an effort, in cooperation with partner agencies, to update the CMS handbook. However, no action to do so was taken until FY2009.

In FY2009, per the UPWP, the EWG plans to complete the development of the CMP as required under SAFETEA-LU, including the development of a congestion database, evaluation measures and mitigation approaches. In FY2009 they also plan to integrate congestion management strategies into the TIP project solicitation and selection process.

This recommendation is continued as part of Recommendation 7 on page 11.

5. EWGCOG has responded to ADA issues, however, we recommend that EWGCOG become more involved in transportation planning for the sight- and hearing-challenged population, as well as non- English speaking populations.

EWGCOG has continued to successfully incorporate the needs of the disabled as part of the planning process and is encouraged to maintain and enhance efforts to outreach to sight and hearing impaired populations as well as those of limited English proficiency.

6. In the 2001 Certification Review report the FHWA/FTA review team included a “Recommendation” that MoDOT re-evaluate its current scheduling procedures in order

that MoDOT submit their projects on a timely basis for inclusion in EWGCOG's draft TIP. During this Certification Review, we found that MoDOT has made progress in submitting their projects to EWGCOG on a timely basis. Our recommendation from the 2001 Certification Review continue with the expectation that MoDOTs improves its project scheduling procedures by the next TIP development cycle.

Generally, both State DOTs submit programs of projects according to a schedule that is consistent with the EWGCOG TIP development process. However, there have been instances where programs have been submitted very late in the process for various reasons. Beyond the administrative hardships that this creates, it minimizes the ability of the MPO, its member agencies, and the public to provide meaningful review and comment on these programs.

This recommendation is continued as part of Recommendation 1 on page 9.

7. To ensure that EWGCOG is able to determine if a local project sponsor is planning to utilize a new or proposed funding source for their match funding, we recommend that the current "Non-Federal Funding Disclosure Form" utilized in the TIP project selection process be modified to include an entry field for identifying the type of funding source along with the clarification of whether it is new or proposed funding source.

In response to the Review Team's 2004 recommendation, EWG informed the 2004 Review Team that they would modify the "Non-Federal Funding Disclosure Form" used in the TIP development materials to include a field for identifying the funding source, in addition to whether the funding is from a new or proposed source. However, no action has been taken to do so. The "Financial Certification of Matching Funds" page included in Section G of the new TIP project application packet, does not include the directive for the LPA project sponsor's Chief Elected Official and Chief Financial Officer to identify the type of local funding source or whether the funding is a current or new/proposed funding source.

8. We recommend that MoDOT reevaluate its process for providing their revenue estimates to EWGCOG for the purpose of achieving a more effective transportation planning process for the St. Louis metropolitan area. We recommend that MoDOT meet with EWGCOG and IDOT to discuss improving their interagency coordination for determining available revenue estimates.

Revenue estimates have been closely scrutinized in recent years in order to develop fiscally responsible highway and transit programs during time periods defined by drastic increases in material costs and declines in VMT. Because of the significance of these estimates, proper and timely coordination between the State DOTs and the MPO is critical.

9. In the 2001 Certification Review report, the FHWA/FTA review team included a "Recommendation" that EWGCOG re-examine goods movement within the metropolitan area and integrate the results into the planning process. The 2004 review team continues to recommend that EWGCOG place more emphasis on integrating freight movement into their transportation planning process. We encourage EWGCOG to utilize the FHWA's Freight Development Program (www.ops.fhwa.dot.gov/freight/fpd/) as a package of tools to assist integrating freight movement into the planning process.

EWGCOG has initiated efforts attempting to increase the role of freight in the planning process. It has adopted the strategy to focus on individual freight projects of significance within the region and seeks to develop a strategic regional intermodal freight investment plan. A freight focus group was utilized in the development of Legacy 2035, the region's current Long Range Transportation Plan. The LRTP identifies a Primary Goods Movement Network however this network is based on a limited level of study. The continued need to improve the understanding of regional freight movements is amplified by the inclusion of I-70 in the US DOT Corridors of the Future program.

This recommendation is continued as part of Recommendations 3 on page 9.

10. We encourage EWGCOG take steps to enhance the delivery and effectiveness of the Gateway Guide effort through their direct involvement and outreach activities to local public agencies.

As the ITS Operator, EWGCOG has been continuously involved ITS deployment and operations throughout the area. The St. Louis Regional ITS Architecture was completed in 2005 consistent with the timeline established in the Final Rule for ITS Architectures. A comprehensive update to the ITS Architecture was initiated during 2008. Through this work, the MPO has developed the philosophy that the actual architecture has become the by-product of the effort while the real success of the update has been the increased and improved communication between the regional ITS partners.

11. We recommend that EWGCOG consider implementing an outreach effort to educate the public agencies about the benefits of Comprehensive Access Management in the region through the sponsoring of workshops. Another possibility for EWGCC to consider in promoting effective access management would be to include access management as a weighted factor in the TIP development process.

As part of outreach efforts for the development and implementation of the Legacy 2035 and the CMP, EWGCOG has presented the advantages of access management in several forums. EWGCOG is encouraged to continue to explore ways to educate and incorporate access management principles in the planning and design of corridors and facilities.

12. Recommended that EWGCOG define the exceptional circumstances in which facilities for bicyclists and pedestrians will not be required in all transportation projects in the St. Louis metropolitan area.

This recommendation has been implemented. The model ordinance for bicycle/pedestrian accommodations included in the St. Louis Regional Bicycling and Walking Plan defines circumstances where facilities and/or accommodations may not be appropriate. Federal guidance and state design standards can also be referenced for facility warrants and exceptions. EWGCOG is encouraged to continue working towards improved conditions and safety for bicycling and walking to contribute towards an integrated, intermodal transportation system which provides travelers with a real choice of transportation modes.

13. Recommend that that the following 23 USC Section 217 (g) (2) text be incorporated into the New Project Application completed by local project sponsors as part of the TIP project selection process: “(a) (2) Safety considerations. --Transportation plans and projects shall provide due consideration for safety and contiguous routes for bicyclists and pedestrians. Safety considerations shall include the installation, where appropriate, and maintenance of audible traffic signals and audible signs at street crossings.”

This recommendation has been implemented. The Federal statute text has been included in the Bicycle and Pedestrian Facilities section of the new project application packet.