

INTER AGENCY CONSULTATION GROUP  
Tuesday, April 23, 2013  
East-West Gateway Board Room

Members Present:

Michael Coulson, Chair - East-West Gateway Council of Governments  
Joe Winkelmann - Missouri Department of Natural Resources  
Mike Henderson - Missouri Department of Transportation  
Jim Stack - Illinois Department of Transportation, District 8  
Betsy Tracy - Federal Highway Administration, Illinois  
Christopher Schmidt - Illinois Department of Transportation  
Bruce Carmitchel - Illinois Department of Transportation  
Steven (Cody) Brown - U.S. Environmental Protection Agency Region 7 (telephone)  
Mike Rogers - Illinois Environmental Protection Agency (telephone)

Others Present:

Joe Gray - Illinois Department of Transportation, District 8

Staff:

Jim Wild      Larry Grither      Jason Lange      Carol Lawrence

1. Call to Order

The meeting of the Inter Agency Consultation Group (IACG) was called to order by Mike Coulson, East-West Gateway Council of Governments (EWG).

2. Status Report - Conformity Determination for FY 2014-2017 Transportation Improvement Program  
- East-West Gateway Council of Governments

Mr. Coulson, EWG, said that it looks like EWG will be able to use the Motor Vehicle Emission Simulator (MOVES) model for all of the regional emissions analysis tests. Ms. Lawrence, EWG, added that as Ms. Shoab was finishing up the MOVES sensitivity analysis runs, she was unable to attend. Information from the previous Transportation Improvement Program (TIP) is being used in these runs. The output from both the ozone and fine particulate (PM<sub>2.5</sub>) sensitivity runs looks good. Once projects for FY 2014-2017 TIP are approved by the Missouri and Illinois Transportation Planning Committees (TPCs), staff will re-run the travel demand model and MOVES.

Mr. Coulson, EWG, said that the Missouri Department of Natural Resources (MoDNR) modeling staff had suggested that EWG use MOVES to develop 2002 baseline emissions for direct PM<sub>2.5</sub> and oxides of nitrogen (NO<sub>x</sub>) for Missouri and Illinois. These estimates would be used in the PM<sub>2.5</sub> regional emissions analysis (build/2002 baseline) instead of the Missouri

and Illinois 2002 baseline emissions developed with the Mobile model. In that way, MOVES would be used to develop both build and baseline emissions. EWG has developed 2002 baselines and is planning to include them in regional emissions analysis. EWG is asking for consensus from the IACG on this action. This would be the most significant change made to the Conformity Determination planning assumptions.

Mr. Rogers, Illinois Environmental Protection Agency (Illinois EPA), asked if the U.S. Environmental Protection Agency (USEPA) or Federal Highway Administration (FHWA) had approved this. Someone from the federal level who approves these things ought to weigh in. He observed that if these Mobile-derived numbers were based in a State Implementation Plan (SIP), then there should be some USEPA involvement in deciding whether they can be changed. Mr. Coulson, EWG, asked if they had been used in a SIP. Mr. Rogers, Illinois EPA, said that the emissions inventory where the 2002 numbers came from is part of a SIP. Although, it may not have been a control strategy SIP.

Mr. Coulson, EWG, said that in this instance, doing basically a build/no build test and the numbers involved have not been approved by any regulatory body. Mr. Rogers, Illinois EPA, said that even though similar to a build/no build test, the 2002 baseline emissions still serve purpose of a motor vehicle emissions budget in the broader sense. Would like to know what USEPA thinks of this proposal.

Mr. Brown, USEPA Region 7, asked about the status of PM<sub>2.5</sub> SIPs. Mr. Coulson, EWG, said that neither Illinois nor Missouri have approved PM<sub>2.5</sub> SIPs or adequate motor vehicle emission budgets. In the last few Conformity Determinations EWG has used 2002 baseline emissions developed by the states with Mobile6. EWG is proposing to use MOVES to develop 2002 direct PM<sub>2.5</sub> and NO<sub>x</sub> baseline emissions. Mr. Brown, USEPA Region 7, said that he thought that approach was correct but that he would check with the Conformity Team in USEPA's Office of Transportation and Air Quality (OTAQ). In build/no build situation, do not think this constitutes a SIP. He will then e-mail Mr. Coulson with the OTAQ decision.

Mr. Winkelmann, MoDNR, said that it was good to have USEPA involved in discussion and that this meeting is the first time this item was brought up. This is the start of a worthwhile discussion.

Mr. Rogers, Illinois EPA, said that the State(s) generated these interim emissions baseline using the Mobile model and their own assumptions. He said that he understood why EWG would want to just use MOVES. But if going to switch over to MOVES and develop 2002 baseline emissions, think Illinois should do that. He has not seen anything in the Federal guidance where it allows the metropolitan planning organization (MPO), like EWG, to develop new numbers for emission baseline year and use them for conformity determination purposes.

Mr. Winkelmann, MoDNR, asked if there was a difference in using the MOVES 2002 emissions and the Mobile6 2002 emissions. Mr. Coulson, EWG, said that can meet all the PM<sub>2.5</sub> tests with the Mobile baseline but are close with one analysis year. It would be a lot cleaner and simpler if could use MOVES-generated 2002 baseline emissions. Also, EWG staff has coordinated with Illinois EPA and MoDNR staff in developing MOVES assumptions and inputs. Mr. Rogers, Illinois EPA, agreed but was not sure that this procedure was allowed to take place. Could still use MOVES to generate build emissions and compare to Mobile-derived 2002 baseline emissions. Mr. Brown, USEPA Region 7, said he would talk with OTAQ.

EWG staff distributed a copy of the schedule for the Conformity Determination for the FY 2014-2017 TIP. Staff plans to send out a draft for the IACG to preview by May 3. The draft Conformity Determination will be presented to Gateway's Executive Advisory Committee (EAC) on May 21 and the Board of Directors on May 29. The Board will authorize the release of the draft Conformity Determination and draft TIP for review and comment. During June there will be a series of public open house meetings. The Board will adopt the Conformity Determination and the TIP at their July meeting.

### 3 Project Classification List Update - Jason Lange, East-West Gateway Council of Governments

Staff received programs from partner agencies (MoDOT, IDOT, Metro and Madison County Transit). TIP and Systems Evaluation staff have evaluated the projects in these programs and coded them as regionally significant, not regionally significant or exempt. The February 2012 Regionally Significant Project Screening Criteria document was consulted.

Appendix A contains listing of projects to be included in the travel demand model and forms basis for air quality conformity determination. At this time, Table A-1 contains: new projects from MoDOT, IDOT, Metro and Madison County Transit; new non-federally funded projects that are adding capacity (two will be in travel demand model); and all of the local sponsor project applications to be funded through STP, CMAQ, On-System Bridge. Missouri and Illinois PCs are reviewing the local projects and will make recommendations on those to be funded and included in the draft FY 2014-2017 TIP. Appendix A in the draft for preview Conformity Determination should contain the TPC-selected projects. Table A-2 contains projects that are carried over from the previous TIP, long range transportation plan projects and other non-federally funded projects which have not been implemented. Their air quality classification and place in the travel demand model has not changed. The IACG has reviewed these projects previously.

Copies of the draft April 23 Appendix A were distributed. The IACG was asked to review and comment on the air quality classifications for the Table A-1 project by May 1. This information will be e-mailed today or tomorrow. Mr. Wild, EWG, suggested that project

descriptions be available on the EWG download site. Mr. Lange, EWG, agreed to this proposal.

Mr. Stack, IDOT, said that IDOT would like to find out if some additional projects could be included in the FY 2014-2017 TIP. Two of them (adding lane to Green Mount Road and Tudor-Pigott connector feasibility study) are regionally significant. Mr. Lange, EWG, said there is still time. Mr. Wild, EWG, added that if it is possible to include these projects in the travel demand model, then they could be added to Table A-1 before it is sent out to the IACG for the review of final air quality classification.

#### 4 Draft Conformity Users Guide - Michael Coulson, East-West Gateway Council of Governments

The draft Conformity Users Guide was distributed to IACG participants. An electronic version of the draft Guide will be sent out. The first section describes the steps involved in carrying out a Conformity Determination at East-West Gateway and responsibilities of the partner agencies. The Appendices contain: the February 2012 Regionally Significant Project Screening Criteria; checklist for Conformity Determination process; March 2013 EWG Semi Annual Conformity Determination policy; table delineating the roles and responsibilities of federal, state and local transportation and air quality agencies in conformity; March 2013 CO or PM<sub>2.5</sub> "Hot-Spot" Analysis Considerations for Project Sponsors; and a glossary of conformity and air quality terms. IACG members have already received pdfs of the following: St. Louis Area Transportation Conformity Requirements (MoDNR rule); March 2012 Baseline Assessment Review (BAR) report; and the December 2012 BAR Recommendations and Responses table. The IACG was given until May 24 to review and comment on the draft Guide. The aim is to adopt the Guide at the June IACG meeting which will satisfy a BAR deadline.

Mr. Coulson, EWG, thanked Mr. Henderson for his efforts to develop the CO or PM<sub>2.5</sub> "Hot-Spot" Analysis Considerations for Project Sponsors document. Mr. Henderson, MoDOT, said that MoDOT has already used this document in some NEPA analysis.

#### 5 Missouri Ozone Early Action Plan - Joe Winkelmann, Missouri Department of Natural Resources

At past IACG meetings, the development of Missouri's Early Progress Plan for the 2008 ozone standard has been discussed. Decision to prepare the ozone Early Progress Plan for the Missouri Portion of the St. Louis ozone non-attainment area was twofold. First, MOVES was going to be required to develop 2015 VOC and NO<sub>x</sub> motor vehicle emission budgets for use in Conformity Determination. They would replace the USEPA-approved 2014 Mobile6-derived budgets. In addition, the Plan would show that area is on "glide path" of ozone reductions due to the continuing tightening of federal motor vehicle emission standards and the increase in the number of vehicles in the fleet having to follow these

tighter standards. The Early Progress Plan established MOVES-based 2015 motor vehicle emissions budgets. (See below) In future Conformity Determinations would be able to compare MOVES-derived build emissions to MOVES-derived budgets. The Early Progress Plan was adopted at the March 2013 Missouri Air Conservation Commission (MACC) meeting.

Missouri Ozone Early Progress Plan 2015 Motor Vehicle Emissions Budgets - Tons per Ozone Season	
NO <sub>x</sub>	76.70
VOC	32.70

Today MoDNR would like to talk with Mr. Brown of USEPA Region 7 and the IACG about when to submit this plan. MoDNR is looking for consensus on when MoDNR should submit its Early Progress Plan to USEPA Region so the budget adequacy process and finding can be completed before the start of the next Conformity Determination. MoDNR has been in discussions with USEPA Region 7 on this subject. The intent is to hold off the submission until this current Conformity Determination process for the FY 2014-2017 TIP is completed. After that, MoDNR will submit the plan to USEPA and USEPA can start the budget adequacy review process. That way there would be sufficient time for the use of the 2015 budgets in the next Conformity Determination.

Mr. Coulson, EWG, said that the current Conformity Determination process is expected to end in July or August 2013. Mr. Winkelmann, MoDNR, asked if everyone was on board with that time frame. Mr. Brown, USEPA Region 7, said that as soon as Early Progress Plan is received by USEPA Region 7, it can be posted on the web and the budget adequacy review process can begin. USEPA has worked closely with MoDNR and has seen the document several times, so it should not take too long to review. Originally submittal timing was important because of the switch over to MOVES.

Mr. Brown, USEPA Region 7, said that the date when the Conformity Determination process for the FY 2014-2017 TIP is officially done will dictate when the Early Progress Plan should be submitted. Ms. Lawrence, EWG, asked if officially done refers to when the EWG Board adopts the Conformity Determination or when OneDOT approves it. Mr. Brown, USEPA Region 7, said that it would be the OneDOT approval. Mr. Coulson, EWG, suggested that MoDNR wait to submit the Early Progress Plan until after EWG receives the OneDOT letter which could be sometime in September. Mr. Brown, USEPA Region 7, said that he will ask OTAQ for clarification on what is considered to be end date of the Conformity Determination process and e-mail Mr. Coulson with their response.

## 6 Other Business

The next meeting of the IACG will be on Tuesday, June 25, 2013 shortly after the conclusion of the Air Quality Advisory Committee meeting. There being no other business, the meeting of the Inter Agency Consultation Group was adjourned.