

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



April 15, 2013

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EXECUTIVE SUMMARY

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 last Federal Certification Review was completed April 13, 2009 and certified that the transportation planning process carried out in the St. Louis, MO-IL TMA, for the period April 13, 2009 to April 13, 2013, was substantially meeting the requirements as described in 23 CFR Part 450 and 49 CFR Part 613

The scope of the 2013 TMA planning certification review was comprehensive, covering the transportation planning process for the entire region, with all partnering agencies involved. The Federal Review Team's work effort 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 January 22-24, 2013. The Review Team also assessed progress in addressing recommendations from the 2009 Federal Certification Review. The Final Report documents the review team's observations and findings, including one (1) corrective action, and 16 recommendations for improvement to the local planning process and 16 commendations. A detailed summary of commendations, corrective action and recommendations is shown in the Process Review Findings section of the report.

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 (TMA), for the period April 13, 2013 to April 13, 2017, is certified as substantially meeting the requirements as described in 23 CFR Part 450 and 49 CFR Part 613, subject to EWGCOG taking action on the identified corrective action that requires the EWGCOG to have a functioning Congestion Management Process (CMP) developed, established, and implemented as part of the metropolitan transportation planning process on or before September 30, 2013. The adopted CMP must meet the requirements outlined in 23 CFR 450.320, including coordination with transportation system management and operations for activities. The MPO's progress in addressing this corrective action will be monitored by the Review Team. If the MPO has not satisfied this corrective action by September 30, 2013, restrictions on updating or amending the TIP will be imposed. This restriction will not allow Federal funds to be programmed for any project that will result in a significant increase in the carrying capacity for single occupancy vehicles (i.e., a new general purpose highway on a new location or adding general purpose lanes, with the exception of safety improvements or the elimination of bottlenecks).

I. Introduction

A. 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 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 urbanized area.

The purpose of the certification 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.

B. Organization of the MPO

The East West Gateway Council of Governments (EWGCOG) is the designated MPO for the St. Louis urbanized area. There have not been any recent changes made to the membership of the EWGCOG Board of Directors. There are currently 24 voting members and five non-voting members who represent agencies and governments throughout the eight counties covered by the MPO in Missouri and Illinois. The St. Louis metropolitan planning area (MPA) includes five counties in Missouri, and three counties in Illinois. The only anticipated future change to the membership structure will be limited to the addition of SDOT and local transit operator representatives to the Board of Directors. The membership of the EWGCOG Board of Directors, the

Executive Advisory Committee (EAC), the Transportation Planning Committees (TPC) and the various modal and programming committees is described in bylaws and operating procedure documents. Further details on all EWGCOG's committees can be found at <http://www.ewgateway.org/aboutus/committees/committees.htm>

C. Review Team Members

The Federal Review Team was composed of the following five individuals:

Brad McMahon, FHWA Missouri Division, Transportation Specialist
Mike Latuszek, FHWA Missouri Division, Community Planning
Lauren Paulwell, FHWA Missouri Division, Civil Rights Program Manager
Betsy Tracy, FHWA Illinois Division, Transportation Planning Specialist
Mark Bechtel, FTA Region VII, Community Planner

D. Review Approach

This planning certification review consisted of three primary activities: review of planning products and processes (office/desk segment and during the site visit), a site visit, and preparation of a Final Report that summarizes the review and offered findings. The review focused on compliance with federal regulations, challenges as well as successes, and discussion about the cooperative relationship between the MPO, State Departments of Transportation, and transit operators in conducting the metropolitan planning process.

As part of the office/desk segment of the review, the Review Team developed a set of review guideline questions. The EWGCOG's response to guideline questions were used as a resource for delivering the on-site segment of review. The on-site segment of the Federal Certification Review of the transportation planning process for the St. Louis Transportation Management Area occurred on January 22-24, 2013 at the offices of the EWGCOG.

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 (UPWP) approval, Long Range Transportation Plan (LRTP), Metropolitan and Statewide Transportation Improvement Program (TIP) findings, as well as a range of other formal and less formal contacts. The Federal Review Team has prepared this Final Report for the purpose of documenting the results of the review process and it is based upon the cumulative findings of the entire review effort.

E. Input from the Public, Officials, and Member Agencies Staffs

Providing opportunities for public participation is a 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 their 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.

A public meeting was conducted as part of the Certification Review on the evening of January 22, 2013 from 5:30 – 7:00 PM. An attendance sheet containing the names of attendees at these hearings is contained in the appendices of this report.

The Certification Review Team made a presentation to the EWGCOG Executive Advisory Committee (EAC) as part of the EAC regularly scheduled January 22, 2013 meeting. The presentation included a power point overview of the Certification Review process and an invitation to the EAC member to participate in the review.

The majority of the on-site visit consisted of discussions with staff from EWGCOG, MoDOT, IDOT, and the local transit operators. These agencies receive federal funds and are required to comply with federal planning laws and regulations. Attendance sheets containing the names of participating staff are contained in the appendices of this report.

II. Disposition of 2009 Certification Review Recommendations

The 2009 Federal Certification Review Final Report dated April 14, 2009 presented 17 recommendations for the EWGCOG, SDOTs and local transit operators to improve the transportation planning process. The implementation status of each recommendation is presented in a status summary table that can be viewed in Appendix A. Thirteen of the 2009 recommendations have been fully or partially implemented.

III. 2013 Commendations, Corrective Action and Recommendations Summary

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:

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

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.

A. COMMENDATIONS - NOTEWORTHY PRACTICES

1. Metro and the EWGCOG are commended for their effort to partner together to produce a Metro transit long-range plan. This plan, *Moving Transit Forward*, presents the shared community vision to meet the regional transit needs over the next thirty years.

2. The EWCOG is commended for their leadership and partnering work effort to facilitate additional needed funding for their transit system.
3. Metro is commended for its effort to facilitate strategic collaboration between Metro, St. Clair County Transit District and Madison County Transit District that resulted in the expanded the availability of public transit and promoted its use among regional commuters.
4. The EWGCOG is commended for its effort to develop and lead the Ecological Approach to Infrastructure Development Initiative that brought Federal, State and local resource management and regulatory agencies together to work on data development, mapping and the application of products and tools both now and in the future. Coordination between organizations, and overlaps in plans have been identified in order to better inform transportation planning decisions for the region.
5. The MoDOT Transportation Planning Division staff is commended for their effort, over the last three years, to facilitate the development of a solution to the matter of the federal cognizant agency certification of the EWGCOG's in-direct cost allocation plan (ICAP). Their leadership, insight and persistence has resulted in a value added process improvement that enhances the effectiveness and efficiency of the EWGCOG's UPWP development and delivery processes and ensures EWGCOG's timely reimbursement of indirect costs.
6. The EWGCOG is commended for its enhanced documentation of the demonstration of fiscal constraint, including the documentation of Operation and Maintenance (O&M) and state and local revenue in the Transportation Improvement Program (TIP) financial plan.
7. The EWGCOG is commended for the modifications they have made to the Annual Listing of Obligated Projects work product. This work effort has produced a stand-alone report that reflects an enhanced level of documentation and user friendliness.
8. The EWGCOG is commended for its strong leadership in facilitating the resolution of the long standing MoDOT and IDOT design issues in connection with the Poplar Street Bridge /I-55/I-70 Interchange project.
9. The EWGCOG staff and the Interagency Consultation Group (IACG) members are commended for implementing the majority of the Air Quality Program April 2011 Manager's Meeting "action items" and the FHWA/FTA/EPA AQ Baseline Assessment Review recommendations; and for improving the overall AQ conformity determination process in the St. Louis metropolitan planning area.
10. EWGCOG's is commended for their proactive effort to strengthen their Title VI program and for hosting Title VI Workshop on November 14, 2012.
11. EWGCOG's is commended for developing The System of Plans that includes GIS files representing more than 65 local members' future land use plans and zoning maps. These data layers have been shared with other agencies to enhance the coordination of land use plans, policies, and strategies throughout the region.
12. The EWGCOG is commended for its utilization of the Land Use Evolution and Assessment

Model (LEAM) to project changes in land use, population and employment that are utilized in the St. Louis area's Regional Transportation Plan 2040 and the development of an online interface that can now be used by EWGCOG staff to submit customized scenarios.

13. The EWGCOG is commended for their effort to develop the Regional Ecological Framework (REF) and their utilization of the REF to enhance the region's ability to develop regional and local, ecosystem-level planning approaches to avoid, minimize, and mitigate the environmental impacts of existing and future infrastructure investments.
14. The EWGCOG is commended for developing and implementing their Great Streets Initiative program that provides the opportunity for communities to receive planning assistance in designing great streets and for championing the integration of great street principals into the overall metropolitan planning process.
15. The EWGCOG is commended for their ongoing partnering effort to develop a Regional Plan for Sustainable Development (RPSD) for the St. Louis metropolitan planning area.
16. The EWGCOG is commended for its effective leadership in facilitating the conduct of a Regional Freight Study, the formation of a regional freight advisory group and the caliber of its technical analysis of goods movement.

B. CORRECTIVE ACTIONS

1. The EWGCOG must have a functioning Congestion Management Process (CMP) developed, established, and implemented as part of the metropolitan transportation planning process on or before September 30, 2013. The adopted CMP must meet the requirements outlined in 23 CFR 450.320, including coordination with transportation system management and operations for activities.

C. RECOMMENDATIONS

1. In order to comply with the new MAP-21 requirements for MPOs serving TMAs to include, among others, officials of public agencies that administer or operate major modes of transportation, it is recommended that the EWGCOG, by 10/1/2014, complete the steps necessary to include MoDOT, IDOT and local transit operator representative(s) as voting members of the EWGCOG Board of Directors.
2. It is recommended that the SDOTs and the EWGCOG work together to update the Urban Area Boundary (UAB) map for the St. Louis region to ensure that it reflects the 2010 Census defined urbanized area (UZA) in a timely fashion.
3. It is recommended that the EWGCOG delay the posting of the revised functional classification maps on the agency's website until after the FHWA has formally approves the changes.
4. It is recommended that the EWGCOG and its state and local partners continue to seek new sources of additional revenue to pay for the cost to continue to operate and maintain the

existing regional transit system as well as to provide opportunity for delivery of future capital transit projects and service.

5. It is recommended that the EWGCOG continue to consider the special needs of elderly, disabled and low income individuals in the transportation planning process.
6. It is recommended that EWGCOG's future effort to update their RTP update efforts include the development and adoption of an RTP with inclusion of a *State of the System and Technical Supplement* information which are shared throughout the development phase with member agencies for their review and input..
7. It is recommended that the EWGCOG continue to facilitate early and continuous collaboration and coordination with local, State and Federal planning partners in the development phase of the Regional Transportation Plan (RTP) update effort.
8. It is recommended that EWGCOG's RTP development process include the formalized solicitation and inclusion of regionally significant projects from local public agencies.

The RTP 2040 includes a listing of MoDOT and IDOT sponsored illustrative projects and corridor studies. The EWGCOG is encouraged to consider the inclusion of an illustrative projects listing of LPA sponsored regionally significant projects and LPA corridor studies in the next updated RTP.

9. To ensure future compliance with MAP-21 requirements, it is recommended that the EWGCOG continue to proactively seek out ways to incorporate performance based planning and scenario planning concepts into the overall metropolitan transportation planning process.
10. It is recommended that the MoDOT and IDOT work closely with the EWGCOG to formulate a partnering work plan that will ensure the effective delivery of a collaborative and coordinated SDOT/EWGCOG work effort to develop urbanized area performance targets that address national performance measures established by the Secretary that are based on the national goals outlined in the legislation.
11. It is recommended that MoDOT and IDOT seek out opportunities to enhance collaboration and coordination between MoDOT, IDOT and the EWGCOG, local transit operators and local jurisdiction representatives during the ongoing development and implementation of their respective Statewide Transportation Plans to ensure that the portion of the Statewide Plan that covers the St. Louis metropolitan planning area reflects the policies and vision of the metropolitan transportation plans.
12. It is recommended that the IDOT take steps to work with EWGCOG to develop a process and format for clearly defining IDOT sponsored Advance Construction (AC) projects in the EWGCOG TIP.
13. It is recommended that FHWA and FTA Region VII work together with the EWGCOG and the SDOTs to identify opportunities for improving the current ONE DOT review and approval process for all applicable metropolitan planning work products and processes.

14. It is recommended that the SDOTs and the EWGCOG work together to deliver a comprehensive update to the current ITS Architecture on or before the close of calendar year 2014.

15. It is recommended that the current Public Involvement Plan (PIP), 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 and should be completed by the end of calendar year 2013. The name of the updated document should be changed to the Public Participation Plan.

16. It is recommended that the EWGCOG work closely with IDOT on the development of County level Highway Safety Improvement Plans for the Illinois Counties in the MPO region.

IV. PROCESS REVIEW FINDINGS

Organization of the Metropolitan Planning Organization

Background: The 23 CFR 450.310 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 re-designated.

The Moving Ahead for Progress in the 21st Century Act (MAP-21) created new requirements for MPOs serving Transportation Management Areas to include, among others, officials of public agencies that administer or operate major modes of transportation. The requirement to include providers of public transportation was added in MAP-21. (23 USC 134(d) (2))

Observations: The East-West Gateway Coordinating Council (EWGCOG) was designated the MPO for the St. Louis region in 1973 by the Governors of Missouri and Illinois. The MPO operates under multiple agreements for transportation and air quality planning.

The Board of Directors is the policymaking body for the MPO and East West Council of Governments (EWCOG) 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.

The Executive Director of EWGCOG is Mr. Ed Hillhouse whose position is overseen by the Board

of Directors. Mr. Hillhouse 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.

EWGCOG continues to have a strong management team and a solid research function, both of which support the overall planning activities of the agency. The management team of senior level staff coordinates and collaborates on major projects and priorities of the agency. The five directors, the Director (Ed Hillhouse) and the Assistant Executive Director (Jim Wild), meet regularly to discuss major pending matters and coordinate execution of the agency's work. The key challenge continues to be recruitment and retention of staff in Transportation Planning, especially in the more technical fields where the agency competes with the private sector for talent.

In 2005 membership was modified by an amendment to the agency's bylaws. The number of voting members on the Board was increased from 21 to 24 and the Board membership of the Chair of Metro was changed from voting to non-voting status to be more consistent with the voting privileges of other implementing agencies. The intent of these changes 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. The MoDOT and IDOT have non-voting Board member status.

Finding: EWGCO's current membership and voting arrangement is inconsistent with the requirements of the Moving Ahead for Progress in the 21st Century Act (MAP-21) enacted on October 1, 2012. MAP 21 identifies, that MPOs serving TMAs should include, among others, officials of public agencies that administer or operate major modes of transportation.

Recommendation #1: In order to comply with the new MAP-21 requirements for MPOs serving TMA's to include, among others, officials of public agencies that administer or operate major modes of transportation, it is recommended that the EWGCOG, by October 1, 2014, complete the steps necessary to include MoDOT, IDOT and major local transit operator representatives as voting members of the EWGCOG Board of Directors.

Cooperative Agreements

Background: 23 CFR 450.314 requires cooperative agreements to be in place between the MPO, the State DOT and the public transit operators. These agreements should describe mutual responsibilities in carrying out the metropolitan transportation planning process.

Observation: There have been no changes made to the EWGCOG's cooperative agreements since the 2009 Federal Certification Review. 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 current cooperative agreements between the EWGCOG, the SDOTs, the public transit operators and State Air Quality agencies, 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.

Metropolitan Area Boundaries & Roadway Functional Classification

Metropolitan Planning Area Boundary (MPA)

Background: 23 CFR 350.312 requires that the boundaries of a metropolitan planning area (MPA) 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.

Observations: The MPA boundary for the St. Louis region was last updated in the early 1990's and has not been modified since that approval. The MPA boundary extends to the boundaries of Madison, Monroe, St. Clair, Franklin, Jefferson, St. Charles, and St. Louis Counties (St. Louis City is included within the perimeter of the other county boundaries). The MPA boundary was reviewed after the 2010 Census by the EWGCOG and the SDOTs to determine if the existing MPA boundary meets the minimum statutory requirements for new and updated urbanized areas (UZAs). The review concluded that there was no need to change the current MPA boundary.

Factors that the EWGCOG considers when determining those areas likely to become urbanized within the twenty-year life of the Long Range Transportation Plan include population density, what can reasonably be expected to be develop, etc. There are no areas under consideration for inclusion in an expanded MPA at this time

Finding: The metropolitan planning area boundary map, that meets the requirements outlined in 23 CFR 450.312, is on file at the FHWA Division Offices.

Urban Area Boundary Map (UAB)

Background: A metropolitan planning process is required where there is a Census-defined urbanized area (UZA). On May 1, 2012, the Bureau of the Census issued its designations of the urbanized areas (UZA) and urban clusters (UC) based on the 2010 Census. The 2010 Census-defined UZA may be adjusted outward by local and state officials to better account for transportation features. The new boundary under FHWA regulations is called the urbanized area boundary (UAB). The boundaries of urban areas are fixed by responsible state and local officials in cooperation with each other, subject to approval by the FHWA. Once the adjustments to UZA boundaries are adopted, highways that are impacted by the new boundaries must be functionally reclassified. The UAB does not change the Census Bureau UZA designations or population figures. The UABs are necessary for determining eligibility for federal-aid, statistical reporting, highway street functional classification determinations, and travel demand forecasting.

Observations: Federal legislation provides SDOTs and MPOs the authority to adjust the 2010 Census boundaries to create updated Federal-aid UABs. The St. Louis Urbanized Area map provided by the Census Bureau for Census 2010 included various small land areas as new urbanized areas (UZAs). Areas of the current UAB continue to extend beyond the Census 2010 UZA. With a few exceptions, MoDOT has not updated Missouri's urban boundary maps to reflect the new changes to the Census Bureau's UZAs. MoDOT's urban boundary map for the St. Louis Urbanized Area is based on the 2000 Census. MoDOT plans to eventually update this map along with that of other urbanized areas around the state to accommodate changes from Census 2010.

Recommendation #2: It is recommended that the SDOTs and the EWGCOG work together to update the Urban Area Boundary (UAB) map for the St. Louis region to ensure that it reflects the 2010 Census defined urbanized area (UZA). The MPO should ensure that all areas identified in the 2010 Census are included in the MPO urbanized area.

Roadway Functional Classification Process

Background: 23 CFR 470.105(b) states that it is the SDOT that has the primary responsibility for developing and maintaining the functional classification system. The SDOTs shall cooperate with responsible local officials in developing and updating the functional classification. As the Metropolitan Planning Organization (MPO) for the St. Louis region, it is the EWGCOG's responsibility to develop and maintain the Functional Classification System of roadways within its planning boundaries through coordination with local cities, counties, and the SDOTs. In order to be eligible for federal (STP) funding, a roadway must be functionally classified as a major collector or higher.

Observation: The MoDOT and IDOT maintain the function classification map for EWGCOG and the St. Louis region. EWGCOG solicits for functional reclassification requests biannually during the months of May and November. An announcement is posted on the EWGCOG's website along with an application and guidelines that can be downloaded by the local jurisdictions (applicants). As applications are received, EWGCOG staff transmits them to the relevant SDOT for concurrent review. The EWGCOG and SDOT collaborative and cooperative interagency review of each application, including a joint site visit, is completed before approval recommendations are presented to the EAC and Board of Directors for final approval. Functional Classification changes approved by the Board are added to the agency's functional classification maps and posted on the agency website. Copies of the updated maps are sent to the respective SDOTs. The SDOTs' submit the requested functional classification changes to the FHWA Division Office for final review and approval.

The guide on classifying highways continues to be Highway Functional Classification: Concepts, Criteria and Procedures, Rev. March 1989. It is important to note that the 2008 Addendum allows for greater flexibility for deciding on an appropriate place for changing the functional classification of rural routes when they cross an urban boundary. The MoDOT Functional Classification (FC) Revision Process includes the use of a FC Request Form that must be completed and submitted to the MoDOT Transportation Planning Division for all requests for FC changes to existing roadways or to classify a planned roadway. The completed form includes the MoDOT District office cover letter, a copy of the transmittal letter from the requesting agency and a map.

Recommendation #3: It is recommended that the EWGCOG delay the posting of revised functional classification maps on the agency's website until after the FHWA has formally approved the changes.

Transit and Multi-Modal Planning

Background: Section 5303 of Title 49 and Section 134 of Title 23 require the transportation planning process in metropolitan areas to consider all modes of travel in the development of their plans and programs. Federal regulations cited in 23 CFR 450.314 state that the MPO in cooperation with the State and operators of publicly owned transit services shall be responsible for carrying out the transportation planning process.

Observations: Transit planning is integrated into the EWGCOG transportation planning process and there is coordination between EWGCOG's staff and the transit providers. Metro (Bi-State Development Agency) is the regional transit operator. The Metro and the EWGCOG coordinate planning activities on a variety of levels, from data sharing to regional plans.

The Metro operates bus and MetroLink services in St. Louis City and County and St. Clair County and paratransit (Call-A-Ride service in St. Louis City and County.) Transit services in St. Clair County, including the MetroLink extension to Scott Air Force Base, are operated by Metro under a contract with the St. Clair County Transit District.

The Madison County Transit District operates its own bus and paratransit system, which operates primarily in the County but does provide service to MetroLink in St. Clair County and to the St. Louis CBD.

Transit Long Range Plan

Observation: Since the 2009 review the EWGCOG and the Metro have worked together during the development of Metro's long-range plan, *Moving Transit Forward*, which was adopted by both the Metro Board of Commissioners and the EWGCOG Board of Directors in February 2010. This plan identifies the current system, determines how well current transit services are meeting customer demand, analyzes existing routes and schedules and includes recommendations to improve service over a five-year period. EWGCOG staff later incorporated the transit plan's findings into RTP 2040. The Metro and the EWGCOG coordinate on corridor studies through the Transportation Corridor Improvement Group. The ongoing Rapid Transit Connector Study is a prime example of that cooperation.

Commendation #1: Metro and the EWGCOG are commended for their effort to partner together to produce a Metro long-range plan. This plan, *Moving Transit Forward*, presents the shared community vision to meet the regional transit needs over the next thirty years.

Coordinated Human Services Transportation Plan (CHSTP)

Observation: The EWGCOG initiated the update to the CHSTP in November 2011. This work effort involved updating the demographic profiles of persons with disabilities, persons with low incomes and older adults, identifying existing transportation services, and organizing a Stakeholder Committee. The Committee included a broad range of stakeholders, representing public, private,

and non-profit transportation and human service providers in Missouri and Illinois. Over a period of five months, the Stakeholder Committee met and discussed the regional demographics, system assets, unmet needs and gaps in service, and strategies to address the identified gaps. A draft of the CHSTP update was presented to the Stakeholder Committee in April 2012 for their approval, with comments due May 11, 2012. Six public meetings were held in June 2012 to solicit additional community input and comment on the needs, strategies, and priorities identified in the draft CHSTP update. The draft CHSTP was presented to the Board of Directors and adopted in July 2012.

Since the adoption of the first CHSTP (April 2008), East West Gateway has conducted solicitations for the three FTA programs: Section 5310 (Missouri), JARC, and New Freedom. The selection criteria for these programs were derived from the strategies and processes set out in the CHSTP. The Consolidated Vehicle Procurement Program (Section 5310) in Illinois requires projects and strategies to be derived from the CHSTP process and projects in the St. Louis urbanized area are to be endorsed by the EWGCOG.

Finding: Metro is striving to maintain or improve the service provided to the St. Louis region. Transit planning continues to be effectively integrated into the EWGCOG's metropolitan transportation planning process. The EWGCOG's commitment to re-establish the Metro chair on the Board as a voting status will ensure compliance with MAP-21 while enhancing the strength of an already collaborative and coordinated multi-modal planning process.

Transit Budget

Observation: Metro's transit operating budget is funded by passenger revenue, local sales tax, federal assistance, and some state funding. Over sixty five percent of the grants and assistance, comes from the sales taxes collected in St. Louis City and County. Metro receives little financial support from the State of Missouri. The local revenue sources include a ½ percent sales tax in St. Louis City and County (half of which is retained by the County for highway needs) that primarily supports operations, and a ¼ percent sales tax in St. Louis City and County that was enacted to support MetroLink expansion. The grants and assistance (this includes local sales tax, federal grants and assistance) contributes seventy five to eighty percent of the operating budget. The fare box recovery rate (Passenger revenue) consistently accounts for about twenty percent of the Metro system operating budget. Metro is currently working on moving towards Smart Cards for the purpose of streamlining the efficiency of passenger faring and increasing the recovery rate significantly.

In April 2010, the Proposition A transit sales tax passed in St. Louis County. This passage enacted a ½ percent sales tax in the County and a ¼ percent sales tax in St. Louis City. These new taxing sources generate approximately \$50 million in new annual revenue for operating and maintaining the Metro transit system. The additional sales tax funds generated by proposition A have enabled Metro to stabilize its financial situation. In 2011 the Metro was able to restore service levels to the levels in place in 2008. Since then, ridership has been increasing at a steady rate, both on MetroBus and MetroLink though still not at 2008 levels.

Finding: Historically there has been alternative funding flexed from FHWA to FTA to support transit programs through the Surface Transportation Program (STP) and Congestion Mitigation Air Quality (CMAQ). The STP category of funding may be used for capital assistance, including preventive maintenance, which is defined by law as capital assistance. CMAQ funds may be used for transit system "operating assistance" in connection with new or expanded service for up to a three

year period. All three public transit providers have used CMAQ funding for this eligible operational activity but expressed concern with the limited three year period of use.

In the Regional Transportation Plan (RTP) 2040, the EWGCOG estimated that Metro would have sufficient revenue to fund existing service levels through 2040 if two conditions were met. First, St. Louis County would have to agree to discontinue the practice of placing restrictions on the use of Proposition A funds; second, St. Louis City would need to pass an additional ¼ percent sales tax to bring its rate in line with the County's. Neither condition has been met.

Over the longer term, Metro will need additional state and local revenues to sustain and expand its current system.

Commendation #2: The EWCOG is commended for their leadership and partnering work effort to facilitate additional needed funding for their transit system.

Recommendation #4: It is recommended that the EWCOG and its state and local partners continue to seek new sources of additional revenue to pay for the cost to continue to operate and maintain the existing regional transit system as well as to provide opportunity for delivery of future capital transit projects.

Ridership Trends

Observation: The annual growth rate for Metro transit ridership between fiscal years 2010 and 2012 is about five percent. The MetroBus, with the highest service cut, increased by just under five million passengers and MetroLink increased by just under two million passengers. The Call-A-Ride service also experienced a seven percent gain or over thirty-eight thousand passengers.

With the additional local funding approved by voters in Proposition A, Metro is committed to expanding its coverage and improving its service. To that effect, Metro partnered with the EWGCOGs and prepared a long-range plan, representing its vision for the next thirty years. This plan, *Moving Transit Forward*, presents the shared community vision to meet the regional transit needs over the next thirty years. Moving from planning to implementation, currently Metro is conducting a High Capacity Corridor study in order to select the most feasible route alignment and transit mode to serve the region.

Recommendation #5: It is recommended that the EWGCOG continue to consider the special needs of elderly, disabled and low income individuals in the transportation planning process.

Commendation #3: Metro is commended for its effort to facilitate strategic collaboration between Metro, St. Clair County Transit District and Madison County Transit District that resulted in the expanded the availability of public transit and promoted its use among regional commuters.

Planning Program Work Products

Long Range Transportation Plan

Background: 23 CFR 450.322 requires that TMAs develop a Long Range Transportation Plan (LRTP) 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. The transportation plan must include both long-range and short-range strategies/actions that lead to the development of an integrated multimodal transportation system to facilitate the safe and efficient movement of people and goods in addressing current and future transportation demand. Under MAP 21 legislation, the LRTP has been replaced with the Metropolitan Transportation Plan (MTP).

Renewing the Region (RTR) initiative

Observation: In 2009, the EWGCOG conducted the Renewing the Region (RTR) initiative to assess the region's economic and social health, and to explore possible ways to enhance cooperative planning and action in the region. The initiative resulted in a framework, or set of ten principles used to guide RTP 2040, the region's long-range transportation plan. These principles were derived from discussions with a broad range of citizens and regional leaders over nine months. Those discussions occurred through interviews, focus groups and small group meetings, centered on identifying issues likely to affect the region's future growth and prosperity. The principles were approved by the Board of Directors in May 2010. The Ten Guiding Principles are as follows:

- Preserve and maintain the existing system
- Support of public transportation
- Support of neighborhoods and communities throughout the region
- Foster a vibrant downtown.
- Provide more transportation choices
- Promote safety and security
- Support a diverse economy throughout the region
- Support quality job development
- Strengthen intermodal connections
- Link transportation planning to housing, environment, education, and energy.

The Renewing the Region Initiative, along with the resulting Ten Guiding Principles, provided the context for the RTP update by challenging the region to think beyond strictly transportation and begin to make the connection between transportation and land use.

Regional Transportation Plan (RTP)2040 Development and Adoption Process

Observation: The draft RTP 2040 document was made available for public review and comment in May 2011. It was posted on the EWGCOG's website, and six public meetings were held throughout the region. Maps and educational information were presented at these outreach meetings to illustrate major issues and the proposed investment plan. The public's comments were considered in developing the final versions of the RTP 2040, the FY2012-2015 TIP and the Air Quality Conformity document.

The RTP 2040 was adopted by the EWGCOG Board of Directors on June 29, 2011. The FHWA Illinois and Missouri Divisions and the FTA Region VII, determined that the initial RTP 2040 document approved by the Board did not fully address the federal requirements for the Long Range Transportation Plan. This deficiency caused the St. Louis areas

Legacy 2035 (LRTP) to expire on June 30, 2011. The expired LRTP triggered the start of a 12-month “grace period” before there would be a conformity lapse. During the time it took after 6/30/11(Expiration date) to complete the work effort to modify the 2040 RTP, as needed, the EWGCOG’s FY2011-2014 TIP remained in effect with no limitation to what programmed projects could be awarded. However, the FY2011-2014 TIP was frozen and could not be amended with exempt or non-exempt projects because of the absence of a valid RTP.

The FHWA Illinois and Missouri Divisions’ developed a summary table of preliminary observations & comments regarding the deficiencies in the RTP 2040 and facilitated the collaborative effort to develop a “Plan of Action” for producing the supplemental documentation on or before 9/25/11.

The EWGCOG finalized and submitted their *State of the System and Technical Supplement to RTP 2040* information package to ONE DOT on 7/18/11. The document provides technical detail on the regional transportation system and the analysis used in the development of the region's RTP 2040 (approved in June 2011). The Council's transportation planning activities are highlighted throughout the document. The ONE DOT transmitted its affirming review for acceptance on 7/25/11.

Subsequent to the RTP 2040 document, The *State of the System and Technical Supplement to RTP 2040* information package was made available for public comment at <http://www.ewgateway.org/> beginning Wednesday, July 27, 2011 and ending Wednesday, August 10, 2011, at 5:00 p.m. The link to the supplemental materials was located prominently on the front page of the EWG website to ensure maximum exposure to persons visiting the website. In addition, other public outreach efforts that the EWGCOGs typically uses for such documents were used. No significant comments were received by the EWGCOG.

The St. Louis region is designated a moderate non-attainment area for ozone and fine particulate matter (PM_{2.5}) air quality standards. The RTP 2040 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. The ONE DOT concurrence in the Air Quality Conformity Determination and Documentation (8-Hour Ozone & PM_{2.5}) for the Regional Transportation Plan 2040, and the FY 2012-2015 Transportation Improvement Program was transmitted on September 2, 2011. The ONE DOT approval of the MoDOT STIP amendment for the FY 2012-2015 Transportation Improvement Program (TIP) was given on September 2, 2011.

The final RTP 2040 consisted of two documents; the RTP 2040 and the Supplemental State of the System Report that includes analysis of the five factors identified as key measures of the state of the region’s transportation system performance, namely system reliability, mobility, accessibility, safety and security, and preservation.

The Final RTP 2040 with the *State of the System and Technical Supplement* is consistent with good planning practice, providing the public with a useful product that addresses fundamental concerns about the region's transportation future.

Recommendation #6: It is recommended that EWGCOG’s future RTP update efforts include the development and adoption of an RTP with inclusion of a *State of the System and Technical Supplement* information package.

Recommendation #7: It is recommended that the EWGCOG continue to facilitate early and continuous collaboration and coordination with local, State and Federal planning partners in the development and review phases of the Regional Transportation Plan (RTP) update effort.

Transportation Investment Priorities: #1 Preservation and Operational Needs

Observation: Preservation and operation needs continue to be the highest transportation investment priority in the St. Louis region. The foundation for the RTP's investment strategy was the establishment of preservation costs for the state highway systems and the region's major transit system. The EWGCOG worked together with the MoDOT, IDOT and Metro in the effort that involved estimating road and bridge rehabilitation costs for the highway systems and maintenance, capital replacements, and operating costs for the transit system. Both MoDOT and IDOT have the financial capacity to fully fund their preservation and operational needs through 2040.

The estimated cost of their prioritized transportation preservation and operational activities were subtracted from the total revenues anticipated over the term of the long-range plan. The resulting balance represents the funds available for the MoDOT, IDOT and Metro specific project investments. Subtracting out the revenues needed for preservation and operations, for the RTP horizon period 2012 – 2050, MoDOT shows a balance of \$1.9 billion available to fund new major projects and IDOT shows a balance of almost \$3 billion to fund additional major projects. Metro has no anticipated revenue available for funding capital projects during the RTP horizon period.

Major Project Selection

Observation: Most major projects included in the RTP emerge as preferred alternatives from corridor, sub area, or topical studies. Based on a technical evaluation of the MoDOT, IDOT and Metro projects, and after applying the fiscal constraint, 40 priority projects, costing \$4 billion, were selected for the investment plan and allocated to one of three implementation periods: 2012-2020, 2021-2030, or 2031-2040. Projects that did not fit within the region's financial resources were placed in the illustrative list, which was divided into Tier I and II categories. Tier I designates those projects that should advance first into the priority list if additional funding becomes available. The EWGCOG recognizes illustrative projects and corridor studies as good indicators of the full range of needs, or potential needs, in the region. Their inclusion in the RTP provides a more complete picture of what investments the region should be making to ensure that the transportation system serves its primary accessibility function in the most efficient, effective, and safe manner.

The RTP identifies corridors for future study and project development based on an evaluation of existing and future system performance. The RTP list contains 23 corridor studies for the purpose of developing projects that address existing or emerging transportation needs. These corridors were divided into Tier I and II categories, with the Tier I corridors requiring more immediate attention. Future long-range plans will consider projects identified during those corridor studies.

The certification review team expressed its concern that the RTP 2040 transportation investment prioritization and project selection process did not identify any local public agency (LPA) sponsored regionally significant projects to be delivered over the RTP horizon period. Historically, the EWGCOG has claimed that the reason that no LPA sponsored regionally significant projects are shown in the RTP beyond year four, is because of the inability of the LPAs to demonstrate fiscal constraint. The EWGCOG's reluctance to include LPA sponsored projects in the RTP is also grounded in their determination that since many of the LPAs in the St. Louis metropolitan planning

area do not maintain large professional staffs capable of conducting major transportation studies, the few LPAs that do have that capacity would have an unwarranted advantage in promoting their projects through the RTP. As such, the current RTP development process does not proactively solicit projects from the LPAs located throughout the St. Louis region. Rather, the EWGCOG chooses to recognize their TIP as the planning program document that establishes regional priorities for the local system. The TIP with its four year horizon period is updated annually. The EWGCOG believes that an annual update approach maintains flexibility in the local program and a more effective means of addressing local system issues. The annual TIP update action is accompanied by a concurrent action to amend the RTP 2040 for the addition of the LPA sponsored regionally significant and federally funded projects. TIP amendment actions completed throughout the year include a concurrent amendment action to the RTP 2040 as needed.

The RTP is required to identify all regionally significant projects, including those from non-Federal funding sources. Both LPA and SDOT sponsored regionally significant projects must be formally included in the fiscally constrained and conforming RTP and TIP before FHWA or FTA can take action on them, including a new regional emission analysis and conformity determination (23 CFR 450.328(e)). This means that FHWA cannot issue a ROD until the project, as depicted in the final environmental document, is included in the non-attainment/maintenance area's fiscally constrained and conforming RTP and TIP. Once this project is included in the plan & TIP and FHWA issues the Categorical Exclusion (CE), Finding of No Significance FONSI or Record of Decision (ROD), the project sponsor will be permitted to advance the project further towards implementation.

The EWG's RTP development process does a good job of facilitating formation of the list of regionally significant projects to be sponsored by the MoDOT and the IDOT. However, the review team considers it inappropriate for the EWGCOG RTP development process to not include the solicitation of regionally significant project information from the LPAs. The absence of LPA sponsored regionally significant projects in the RTP beyond the four year TIP horizon period has the potential to delay project implementation at the NEPA determination phase.

Recommendation # 8: It is recommended that EWGCOG's RTP development process include the formalized solicitation and inclusion of regionally significant projects from local public agencies.

The RTP 2040 includes a listing of MoDOT and IDOT sponsored illustrative projects and corridor studies. The EWGCOG is encouraged to consider the inclusion of an illustrative projects listing of LPA sponsored regionally significant projects and LPA corridor studies in the next updated RTP.

Strategies and Performance Measures

Observation: The RTP update effort included the development of strategies for each of the ten principles. These strategies address regional needs and enable the EWGCOG to measure progress toward its efforts to live up to the RTP's guiding principles. All major investments analyzed for inclusion in the RTP 2040 were vetted through an evaluation framework derived from the ten principles and the five factors identified as key measures of the state of the region's transportation system performance. These factors are; system reliability, mobility, accessibility, safety and security, and preservation. For a major project to be included in the TIP, it must demonstrate that it will improve or address the existing situation or conditions to receive priority consideration. The EWGCOG's utilizes established criteria with associated metrics to measure a project's performance.

It is important to note that MAP-21 contains performance measures that will transform the federal-

aid highway program and provide a means to the most efficient investment of federal funds. This is done by refocusing on national transportation goals, increasing the accountability and transparency of the federal-aid highway program and improving project decision making through performance-based planning and programming. Performance measures and targets must be incorporated into long-range planning and short-term programming processes. The development of the performance management system requires a collaborative effort between the US DOT, MoDOT, IDOT and the EWGCOG. Ultimately, the US DOT will establish performance measures, and then the SDOTs and the EWGCOG will establish entity-specific performance targets through a coordinated effort to maximize consistency. The SDOTs and the EWGCOG's long-range plans will need to include System Performance Reports that describe the progress made toward achieving performance targets.

The SDOTs have one year after final federal rulemaking is promulgated (approximately two years after the enactment of MAP-21) to establish their performance targets. The timetable for the EWGCOG to establish their performance targets is no later than 180 days after the date on which the SDOT or public transportation provider establishes their performance targets.

Finding: The RTP 2040 includes performance measures that relate to the Plan's goals, objectives and project selection. MoDOT is recognized as a national leader in performance measures and may have fewer problems or concerns with meeting this new requirement than most SDOTs. It is critically important to ensure that the SDOT performance targets for the St. Louis urbanized areas are developed in collaboration and coordination with the EWGCOG. There should be consistency between the SDOT and the EWGCOG's performance targets. The opportunity for collaboration and coordination between SDOT & MPOs and better consistency between developed urbanized area performance targets is enhanced in TMA in which there exists a functioning Congestion Management Process (CMP).

Recommendation #9: To ensure future compliance with MAP-21 requirements, it is recommended that the EWGCOG continue to proactively seek out ways to incorporate performance based planning and scenario planning concepts the overall metropolitan transportation planning process.

Recommendation #10: It is recommended that the MoDOT and IDOT work closely with the EWGCOG to formulate a partnering work plan that will ensure the effective delivery of a collaborative and coordinated SDOT/EWGCOG work effort to develop urbanized area performance targets that address national performance measures established by the Secretary that are based on the national goals outlined in the legislation.

Ecological Approach to Planning

Observation: New strategies to develop an ecological approach to planning, including creating the necessary data and tools, were included in the RTP 2040. Addressing environmental impacts in the RTP 2040 planning stage allowed the region to highlight and analyze the impact of transportation projects on the full-range of resources that the region deems significant and worthy of preservation.

Ecological Initiative objectives, were incorporated into the development of RTP 2040 at many levels, namely through data development, maps and transportation demand model development. The result is a long-range transportation plan that links conservation and infrastructure planning. There is an ongoing EWGCOG work effort to identify and apply innovative solutions that lessen the impacts of infrastructure development. This work includes wetlands mapping and wetland

restoration modeling.

An objective of the Ecological Initiative is the development of a Regional Environmental Framework. In line with this priority, a web-based interface has been developed that provides a forum for regional data sharing, communication and integrated planning. Partnerships have been established with state and federal resource agencies, non-governmental organizations and other local regional stakeholders that are involved in conservation and preservation efforts. Partnering that enhances the collective data development and mapping efforts as well as the application of products and tools both now and in the future.

Commendation #4: The EWGCOG is commended for its effort to develop and lead the Ecological Approach to Infrastructure Development Initiative that brought Federal, State and local resource management and regulatory agencies together to work on data development, mapping and the application of products and tools both now and in the future. Through this process, the area's most valuable natural resources have been identified, plans and data have been shared between organizations, and overlaps in plans have been identified in order to better inform transportation planning decisions for the region.

MoDOT Long Range Transportation Plan Update

Observation: The MoDOT is currently in the process of updating the MoDOT Long Range Transportation Plan. MoDOT recognizes that engaging Missourians to provide input is a critical step to ensure that MoDOT outlines a sustainable and economically viable transportation vision that serves the growing needs of Missourians well into the future. They are utilizing a community engagement effort, call "On the Move" to gather direction and insight from Missourians on major transportation issues and priorities across the state. In 2013, as part of the "On the Move" program, MoDOT and various community partners will host a series of listening sessions, a mobile tour and virtual forums so that interested citizens, stakeholders and policymakers from across Missouri may be active participants in a conversation about Missouri's transportation future. These events will include many community leaders, transportation experts and everyday citizens who will gather to have a discussion about what is next for Missouri transportation. These events will be centered in large part on small group discussions so that MoDOT can learn in detail about what really matters to Missourians when it comes to transportation. Listening session attendees for the St. Louis region will include EWGCOG, local jurisdictions and chambers, businesses, associations, healthcare and transportation providers, among others. There were three listening sessions in St. Louis. Two took place on February 28 (St. Louis Regional Chamber; St. Charles Convention Center) and one took place on March 14 in Fenton (Unigroup headquarters).

The MoDOT held their annual Statewide Planning Meeting on 2/14/13. The meeting was attended by MoDOT District staff and Missouri MPO and RPC planning partners. One of the agenda items was an overview of the "On the Move" program.

The MoDOT plans to prepare a report that outlines the long-term vision for Missouri transportation later in calendar year 2013. A timeline for release will likely be announced in early summer 2013. Additional information about the MoDOT effort to update their LRTP can be viewed at: <http://www.missourionthemove.org/>

Recommendation #11: It is recommended that MoDOT continue to seek out opportunities to enhance collaboration and coordination between MoDOT and the EWGCOG, local transit operators

and local jurisdiction representatives during the ongoing development of the Statewide Transportation Plan to ensure that the portion of the Statewide Plan that covers the St. Louis metropolitan planning area reflects the policies and vision of the metropolitan transportation plan (RTP 2040).

Unified Planning Work Program (UPWP)

Background: 23 CFR 450.308 identifies the requirements for MPO 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.

The Federal statutes 23 U.S.C. 104(f)(4) and 49 U.S.C. 5305(d)(2) require States to make all FHWA and FTA planning funds available to the Missouri MPOs in accordance with a formula developed by the State, in consultation with the MPOs, and approved by the FHWA and FTA.

Observation: The EWGCOG's Unified Planning Work Program (UPWP) period runs from July 1 to June 30. The UPWP is the document that is used by EWGCOG to organize and unify all of its planning program work for the upcoming year. The UPWP reflects all known transportation planning activities in the region, regardless of funding source. During the development of the UPWP, the EWGCOG requests information from major transportation agencies about planning activities anticipated in the upcoming year. As those agencies respond with projects, the EWGCOG staff prepares a work element in conjunction with the sponsoring agency, includes that element in the UPWP, and identifies relevant funding sources.

Federal Funding for Transportation Planning

Missouri's annual allocation for federal FY 2013 is approximately \$4.4 million FHWA metropolitan planning (PL) funds and \$1.4 million FTA Section 5303 funds. This allocation will vary from year to year depending on Congressional appropriations. Missouri is a Consolidated Planning Grant (CPG) state and FHWA PL funds are transferred from FHWA to FTA. The FTA Region VII Office is the Lead Grant Agency. Using a \$5.8 million allocation total as an example, the resulting annual distribution of CPG funds to the EWGCOGs is \$3,075,625. This amount breaks down as \$2,340,573 (PL) and \$733,954 (FTA 5303).

MoDOT's allocation formula for distributing the PL funds to Missouri MPOs was developed in consultation with MPOs and approved by FHWA in June 2004. The MoDOT allocation formula policy was updated in 2012 to include official updated population information from the 2010 census and the newest MPO in Missouri, Cape Girardeau. The FHWA and FTA reviewed and approved the revised CPG Funding Distribution Formula for Missouri MPOs, on August 1, 2012. The new CPG Funding Distribution Formula for Missouri MPOs became effective with the FY 2013 apportionment of FHWA PL and FTA Section 5303 funding.

The current MoDOT CPG distribution formula policy permits MPOs to keep balances of FHWA PL and FTA Section 5303 funding accumulated from previous years. Annual allocations must be spent within a five-year period, or they will be redistributed to the remaining MPOs. The redistribution of any funds after five years would be based on relative populations. The five-year time frame was selected to allow Missouri MPOs to accumulate funds for larger projects such as

their long-range plans every five years. The EWGCOG maintained a Missouri CPG funds carryover balance in excess of \$11,000,000 at the start of the FY2013 UPWP period beginning July 1, 2012. The EWGCOG's programmed \$5,200,000 in the FY 2013 UPWP. By maintaining a balance of funds, the EWGCOG is able to undertake planning efforts such as the On-Board Transit Survey and Regional Freight Study when necessary. With the uncertainty of the federal funding in future, the estimated balance of \$5.8 million will supplement the available funding allocation for the next year and allow EWGCOG to continue to provide the same level of planning activities in the St. Louis region. Additionally, some new/additional planning efforts that will commit a significant amount of the balance are being considered as part of the FY 2014 UPWP.

The IDOT does not allow the EWGCOG to carryover previously allocated but unexpended FHWA and FTA federal planning funds.

Finding: The FHWA and the FTA are comfortable with the amount of carryover balance and encourages EWGCOG to consider utilizing the carryover funds to cover the cost of new and continued work efforts; such as the development of performance measures and a CMAQ Plan in upcoming work program years.

Non-Federal Revenue

Observation: The EWGCOG's 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 approximately \$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 EWGCOG 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 ranges from a high of \$335,100 to a low of \$158,100. Historically, the EWGCOG has also obtained match from member counties and municipalities for specific planning studies. An additional revenue source is MoDOT direct cost match. In the 2013 UPWP, the EWGCOG is utilizing approximately \$241,166 of direct cost from MoDOT.

Finding: The EWGCOG's UPWP continues to meet the requirements of 23 CFR Part 420.111 relative to showing available non-revenue estimates for each work activity and for the purpose of providing complete information to the public.

Work Elements

Observation: The UPWP provides summary of 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 broad "work element" as well as a cost estimate for each sub-element heading.

Finding: The EWGCOG's UPWP continues to meet the requirements of 23 CFR Part 420.111 relative to showing cost estimates for each work activity and for the purpose of providing complete information to the public. The format of the UWP is acceptable and the description of the work to be undertaken is thorough.

In-Direct Costs

Background: In 2009 the FHWA Missouri Division addressed the need for EWGCOG to obtain the Federal cognizant agency's certification (approval) of the EWGCOG's indirect cost allocation plan (ICAP). For the FY2010 & FY2011 UPWP, absent this certification, the FHWA Missouri Division accepted the MoDOT's review and approval of the EWGCOG ICAP. In June of 2011, FHWA informed MoDOT that the EWGCOG would not be allowed to be reimbursed for 2012 indirect costs (\$1,684,430) absent a Federal cognizant agency certification letter that shows the Federal cognizant agency's approval of the ICAP for FY2012 indirect costs. At the time, it was FHWA and MoDOT's belief that the Department of Housing and Urban Development (HUD), as the Federal cognizant agency, was going to issue a certification letter to the EWGCOG. To-date, the HUD has not issued a certification letter. In 2012 FHWA learned that the U.S. DOT is listed as the "Oversight Agency" in the Federal Audit Clearinghouse (FAC) 2009 report. The term "oversight agency" is used when the amount of direct Federal awards expended is \$50 million or less, or includes no direct awards.

Based on the 2009 Clearinghouse Report (USDOT recognized as the oversight agency) and HUD's refusal to issue a certification letter, FHWA and MoDOT reached an agreement that the MoDOT would review and approve the EWGCOG's ICAP developed for future UPWPs.

The ONE DOT approved the FY2013 UPWP with no condition limiting the EWGCOG's ability to be reimbursed for indirect costs incurred during the work program period. It was understood by ONE DOT and MoDOT, that the MoDOT would review and approve the EWGCOG's indirect cost rate developed as part of the annual single audit process and share the results of said review with the ONE DOT on or before November 30, 2012.

Observation: The FHWA Missouri Division considers MoDOT to be the primary recipient of the planning funds and the appropriate agency for reviewing and accepting EWGCOG's ICAP rate, each year. The EWGCOG is required to submit an updated ICAP to MoDOT annually for review and approval, and then MoDOT is to seek FHWA's concurrence. The FHWA and the MoDOT agreed that beginning the MoDOT review and approval of the ICAP after the completion of the single audit, sometime in early fall, is a sound approach for improving the efficiency of the MoDOT review and approval process. The review and approval process of the ICAP for the FY2014 UPWP was expected to begin after MoDOT's receipt of the EWGCOG's single audit completed in the fall of 2012.

Enhanced collaboration and coordination is critical to the future success of this newly developed ICAP approval process. Once MoDOT and the EWGCOG are on this review and approval cycle and using the results of the completed audit, it is expected that there will be a reduction in the MoDOT review time and the MoDOT will be able to approve the ICAP prior to the start of each new work program year. However, it was noted during the on-site discussions that the MoDOT Planning Liaison had not yet received a copy of the single audit completed in September 2012. A status follow-up revealed that the EWGCOG had sent a copy of the new ICAP and the single audit in October, 2012 to MoDOT Audits and Investigations Division. The Planning Liaison responsible for facilitating the review of the financial information was unaware of MoDOT's receipt of the single audit. The review process, led by the Planning Liaison was initiated on February 1, 2013 and was completed on March 27, 2013.

Commendation #5: The MoDOT Transportation Planning Division staff is commended for their effort, over the last three years, to facilitate the development of a solution to the matter of the federal cognizant agency certification of the EWG ICAP. Their leadership, insight and persistence has resulted in a value added process improvement that enhances the effectiveness and efficiency of the EWGCOG's UPWP development and delivery processes and ensures EWGCOG's timely reimbursement of indirect costs.

Direct Costs

The MoDOT District traffic staff in the St. Louis metropolitan area are funded with state road funds. The "direct cost" of work performed by district traffic staff that can be tied to a specific UPWP work element can then be used by the EWGCOG as direct cost match for their federal planning funds. The MoDOT District staff work includes maintaining traffic data and analyzing traffic characteristics to support the management of the transportation system. The authority cited for allowing this funding arrangement is 23 CFR 18.24 (a)(1). The description of the MoDOT work and the \$241,166 cost estimate for said work is clearly identified in Element 2.04 and the Appendix B section of the EWG FY2013 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 EWGCOG and the MoDOT continue to do a good job of documenting the utilization of MoDOT "direct cost" work items in their UPWP. The Review Team concurs in the EWGCOG's determination this MoDOT "direct cost" policy strengthens the MoDOT and EWGCOG partnership and enhances the EWGCOG effort for planning projects without incurring additional MoDOT costs.

Major Investment Studies (MIS)

Observation: Most major projects included in the RTP emerge as preferred alternatives from corridor, sub area, or topical studies. Those studies typically are conducted to address the most pressing transportation issues and needs. During corridor studies, staff uses stakeholder interviews, focus groups, presentations, and one-on-one meetings with business and institutional interests to identify issues of concern and opportunities. There have been fewer and fewer corridor studies being conducted in the St. Louis metropolitan planning area over the last eight years. The basis for this trend is considered to be twofold. The first is the lack of funding has reduced the opportunity for project sponsors to deliver major projects (beyond those projects that have already attained a sufficient level of planning and project development) and restricted the resources available for corridor-level planning. The second is the backlog of undelivered projects identified in previously completed corridor studies.

Examples of ongoing and recently completed corridor studies include the Loop Trolley, I-270, Alton-Godfrey Transportation Study, and the Rapid Transit Connector Study. In 2013, MoDOT anticipates initiating a multi-county study of the I-70 corridor. The MoDOT and the EWGCOG have begun consultations about the next round of corridor studies in the St. Louis metropolitan planning area.

For all studies that consider major transportation investments but do not produce an environmental document, the EWGCOG and the SDOTs work together to ensure that planning decisions can be

carried through subsequent environmental processes. This involves early coordination and periodic meetings with relevant resource agencies, identifying and evaluating sensitive issues, ensuring that all analyses and processes conform with NEPA requirements, and, in some studies, initiating project scoping and developing a purpose and need statement even if an environmental document is not being prepared. MoDOT also has been proceeding with tiered environmental documents to ensure the sustainability of planning decisions.

Finding: Sub-area and corridor studies in the St. Louis metropolitan planning area are conducted in a manner so that planning decisions and analyses may be carried through to the project development and environmental review processes.

Transportation Improvement Program (TIP)

Background: Federal legislation and the implementing 23 CFR 450.324 requires that an MPO in cooperation with the SDOTs and public transit operators, develop a Transportation Improvement Program (TIP) consistent with the metropolitan long range transportation plan (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. 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 with 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.

TIP Project Development and Selection Process

Observation: The TIP is the implementation of RTP 2040 and the short-range financing plan and schedule for federally funded transportation projects in the St. Louis region. All projects included in the TIP must either be identified as a fiscally constrained priority project or be a project that would act to maintain existing transportation assets and operations. Projects are selected within the EWGCOG’s planning process and included in the TIP based on how consistent they are with the ten principles that make up the framework of *RTP 2040*. The annual update of the TIP is a collaborative effort between East-West Gateway and its partners. Each year, EWGCOG staff requests the program of projects from Metro, Madison County Transit District, MoDOT, and IDOT. The EWGCOG’s does not have direct input regarding what projects are included in the TIP from these agencies. Each of these agency’s prioritized projects are typically included ‘as-is’ in the TIP.

The EWGCOG’s staff does participate in MoDOT’s St. Louis District meeting related to MoDOT’s project development and selection for inclusion in the upcoming TIP. At these meetings, MoDOT staff prioritizes projects based on condition, need, and anticipated funding in future years. The value of EWGCOG’s participation in these MoDOT meetings is that when MoDOT does submit their program, staff is aware of projects that will be included in it, as well as the reasoning behind the project’s selection for inclusion in the program. S i n c e the 2009 certification review, MoDOT has made it a priority to coordinate the exchange of information with EWGCOG better and smarter. One example of this is the creation of quarterly information exchange meetings called PAR (Planning to Achieve Results). Current issues are discussed at these meetings and “ad hoc”

timelines are developed as needed. MoDOT believes that this business approach enhances collaboration while providing timeline flexibility within the project programming process. Another example is the newly created MoDOT policy of not adding projects to the EWG TIP after the MoDOT program has been delivered for inclusion in the yearly TIP update. If projects need to be added after the initial delivery they will, in most cases, be added by amendment once the new TIP is active. This policy allows for exceptions in the case of special circumstances. MoDOT has increased involvement in the Inter-Agency Consultation Group (IACG). Policy improvements have been made through the IACG that streamline the planning processes and benefit all agencies involved.

The EWGCOG's staff is not provided the opportunity to participate in the IDOT or the Metro process meeting to identify and select each agency's projects for inclusion in the TIP. At the present time the EWGCOG does see their lack of participation in these processes as an issue in that they only become aware of what projects are being included in the TIP at a late stage and are not aware of the reasoning behind the projects being selected. The EWGCOG still maintains the chance to review and provide input on IDOT and Metro project programming decisions during the late stages of the TIP project development and selection process, when they review all projects submitted by the SDOTs and local transit operators to determine their alignment with the RTP 2040 principles, accuracy of project descriptions and cost estimates, and how each project relates to Air Quality Conformity.

Decisions on local projects in Missouri and Illinois competing for federal funds are made through the annual TIP selection process, which evaluates projects according to the RTPs principles. Each year, as part of the development of the next TIP, EWGCOG's staff evaluates projects submitted by local governments and agencies for funding consideration under the STP suballocated (STP-S) category. Local project applications are evaluated with respect to how well they meet each of the six project priority areas and be consistent with the ten principles that make up the framework of *RTP 2040*. EWGCOG staff prioritizes and rank local projects based on merit and need with consideration given to equity among jurisdictions. In Missouri, the rankings constitute a recommendation to the MO. Transportation Planning Committee (TPC). In Illinois, along with the rankings, locally sponsored projects also receive significant review from committees of elected officials established in each of the three counties. These committees in turn make recommendations to the Illinois TPC, which then ranks projects based on established project evaluation criteria and geographic equity.

Types of projects that fall outside of the EWGCOG's evaluation and selection process include projects funded through the following programs: MoDOT cost share, Safe Routes to Schools, Transportation Enhancements in Illinois, Earmarks, and other federal discretionary programs (i.e. Transportation Community and System Preservation Program, Interstate Maintenance Discretionary, etc.). The EWGCOG's strives to ensure that the projects selected outside of the EWGCOG's planning process are consistent with the principles identified in *RTP 2040*. Generally, the projects that are selected outside of the planning process all require letters of support from the EWGCOG with notable exceptions being earmarks and other federal discretionary programs. Although in some cases the projects may not be regional priorities, they are priorities of the local member agencies and address a local need.

During the development of each year's TIP, the MoDOT, IDOT, Metro, and Madison County Transit District are asked to identify their programmed projects that have not obligated funds or that have not been implemented and thus need to be rolled over to the new TIP. These projects are

included in the draft TIP that is provided to each agency for final review and concurrence.

Finding: The process used to develop the TIP should be a collaborative effort by the EWGCOG, the SDOTs and metropolitan public transit operators. Each SDOT is aware of the requirement for their agency to coordinate with the EWGCOG in a partnering manner that ensures that the EWGCOG has the opportunity to review and comment on the respective state programming processes at an early enough stage to provide meaningful input prior to each SDOT's submittal for inclusion into the TIP. However, it is noted by the Review Team that the level of opportunity for the EWGCOG's meaningful participation in each SDOT's early project development process varies greatly.

The Review Team encourages MoDOT, IDOT and the Metro to partner together with the EWGCOG to develop an enhanced collaboration process for ensuring the EWGCOG's 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.

Revenue and Cost Estimating

Observation: The TIP is a fiscally constrained document. The proposed federal funding levels for the entire program do not exceed the funds anticipated by the EWGCOG and SDOTs to be available in the various program years and funding categories. These revenue estimates take into account that funding appropriations will be less than MAP-21 authorized amounts by projecting obligation limitation based on previous years' limitations.

For Federal-aid Highway Program (FAHP) funds administered by state transportation agencies the EWGCOG assumes that the MoDOT and the IDOT revenue estimates are equal or greater than the estimated costs of SDOT sponsored projects located within the St. Louis metropolitan planning area. FHWA reviews and concurs in each SDOT's demonstration of fiscal constraint as part of the Federal Planning Finding developed and issued at the time of the annual STIP update. Each SDOT's demonstration of fiscal constraint is reviewed and approved in by FHWA and FTA at the time of STIP modifications throughout the program year.

The EWGCOG develops federal revenue and local revenue estimates necessary for funding and programming local public agency projects with CMAQ, On System Bridge Replacement and Rehabilitation Program (BRM), and STP-E (MO only) funds distributed through East-West Gateway. As part of the project development and selection process, local project sponsors are required to provide their written certification that the project sponsor has the financial capacity to provide the local revenue necessary to match the federal funds that the EWGCOG approves for the LPA sponsored projects.

The majority of the transit funding is formula or discretionary and is allocated directly to recipients like Metro or administered statewide. These revenues are assumed to be equal to the programmed costs for those categories. The TIP includes the EWGCOG certification statement that requirements for financial capacity analysis have been satisfied for FTA Section 5309 and Section 5307 programs.

Because the revenue projections for the current FY2013-2016 TIP were developed prior to the enactment of the MAP-21, the projections of revenue available for funding the local public agency sponsored projects reflect the uncertainty of the absence of a long term funding bill. For the FAHP's local CMAQ and STP-E revenue estimates, it was assumed that no additional revenues would be

available beyond FY 2012. For programs such as STP-S and BRM, future revenues were based on previous year's allocations, and estimated obligation limitation.

Both the SDOT and LPA project sponsors incorporate year of expenditure factors into their revenue estimates and project cost estimates for their projects expected to be implemented beyond the first year of the STIP and the TIP. An inflation factor of 1.02% is used for federal revenue estimated for funding local projects beyond year one of the current TIP. 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.

Finding: The EWGCOG's TIP is a fiscally constrained document. Since the 2009 review, the EWGCOG's has enhanced their documentation of available local revenue and overall demonstration of fiscal constraint, The proposed federal funding levels for the entire program do not exceed the funds anticipated by the EWGCOG and SDOTs to be available in the various program years and funding categories.

Operation and Maintenance

Observation: 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 state and locally owned federal-aid highways and public transportation.

Since the 2009 certification review the EWGCOG has taken steps to develop a process for documenting system-level estimates of cost and revenue sources that are reasonably expected to be available to adequately operate and maintain (O & M) locally owned federal-aid highways and public transportation. This process also includes the incorporation of MoDOT developed O & M costs for state owned federal-aid highways located with the St. Louis metropolitan planning area.

Commendation #6 The EWGCOG is commended for its enhanced documentation of the demonstration of fiscal constraint, including the documentation of Operation and Maintenance (O&M) and state and local revenue in the Transportation Improvement Program (TIP financial plan.

Advanced Construction

Background: 23 U.S.C. 115(c) specifies that an advanced construction (AC) project application may be approved "...only if the project is included in the STIP." 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.

Observation: At the time of the 2009 review, the MoDOT and IDOT AC projects were not identified as AC projects in the TIP. The 2009 review team acknowledged the requirement for each SDOT to document the planning and management of their AC projects and program in the TIP and presented the recommendation for the MoDOT and the IDOT AC projects to be programmed in the TIP. In 2009 the MoDOT and the EWGCOG collaboratively developed a format for showing the MoDOT AC projects in the TIP.

Like the MoDOT, the IDOT has a large AC program and maintains a substantial “inventory” of projects on AC status. The IDOT considers the AC program to be a cash management tool and not part of the project selection process. As such, there has been little if any effort by IDOT to work together with the EWGCOG to document the planning and management of the IDOT AC projects in the TIP. The FHWA Illinois Division is working with IDOT statewide to formulate a process for appropriately showing AC in the STIP and TIPs. Once a collaboratively developed process has been formulated for showing AC projects in the IDOT STIP, the FHWA and IDOT will work with the EWGCOG on how IDOT AC projects will be shown in the TIP.

Finding: In order to document the demonstration of fiscal constrain, it is necessary for the AC project/project phase to essentially be included in the TIP and/or STIP at two different points in time: (a) as a State or local funded project prior to the initial authorization of the AC project (including an assurance from the State that adequate State funds are available to “front” the cost of the project/project phase); and (b) prior to the authorization of the project/project phase 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 project is considered as both a State revenue source and a Federal-aid debit.

Recommendation #12: It is recommended that the IDOT take timely steps to work with EWGCOG to develop a process and format for clearly defining IDOT sponsored Advance Construction (AC) projects in the EWGCOG TIP.

Public Participation:

Background: All interested parties shall have a reasonable opportunity to comment on the proposed TIP as required by 450.316(a). In addition, in nonattainment TMAs, an opportunity for at least one formal public meeting during the TIP development process; the circumstances of the public meeting should be addressed through the participation plan described in 450.316(a).

Observation: Public participation activities in connection with the development of the TIP include “open houses” that allow opportunities for the public comments to be heard and recorded. Open houses also provide the EWGCOG the opportunity to disseminate vital project, program and regional information throughout the communities of the region. Materials for TIP meetings are customized for the specific part of the region in which the meeting is taking place, and include maps, PowerPoint presentations, graphs and charts that highlight sub-regional projects and regional impacts. All public comments that are received are considered for integration into the finalized TIP. The EWGCOG presents a summarized list of all public comments that are received during the TIP process on their website and provides a summarized list to the Executive Advisory Committee and to the Board of Directors.

Finding: The EWGCOG’s has a proactive public participation process that actively encourages broad participation in the development of all planning products, including the TIP.

Annual Listing of Obligated Projects

Background: Federal law requires the EWGCOG's to publish 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.

Observation: Since the 2009 Certification, the process of producing the Annual Listing of Obligated Projects has been modified. In 2011 EWG began using a reporting period for the Annual Listing of Obligated Projects of October 1 - September 30. Prior to that time, because of the timing of the development, and approval, of the EWG TIP (Board approval usually by July of each year) they had used a July 1 - June 30 reporting period. Instead of being included in the updated TIP, the Annual Listing is now a standalone document that is published and posted on the agency website.

Additional information now included in the Annual Listing includes length of the project, total programmed project cost, total actual project cost to date, type of federal funds obligated and if project has bicycle and/or pedestrian elements.

The locations of those projects that have had funds obligated and that remain in the TIP because of future year commitments are shown on maps in the project listing section. The TIP includes at least one map for each county in the MPO area. This information is useful in that it shows the progress of projects, including the comparison of the amount of funds obligated relative to the amount of funds remaining.

Commendation #7: The EWGCOG's is commended for the modifications they have made to the Annual Listing of Obligated Projects work product. This work effort has produced a stand-alone report that reflects an enhanced level of documentation and user friendliness, including the listing of IDOT advanced construction projects.

Reasonable Progress Policy

Observation: The EWGCOG has a well-developed Reasonable Progress Policy. For local public agency sponsored 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. The progress of Missouri LPA projects is monitored throughout the year. Local projects that have received a one-time extension, not obligated funds or have not been implemented are not included in the new TIP unless they are subject to the Reasonable Progress deadline. Because of different policies established by the subcommittees of the Transportation Planning Committee in the two states, local Illinois projects do not receive the same level of detailed review as Missouri projects from EWGCOG, with regard to progress toward fund obligation and implementation.

The EWGCOG sends a list of Illinois LPA projects that need to be included in the next TIP to the IDOT local roads group for review. The local roads group indicates the projects that have had funds obligated (which are subsequently removed from the new TIP) and those that have not. Both SDOTs are provided an opportunity in the late stages of the TIP development process to conduct their final review of LPA projects that will be rolled over into the next TIP.

Finding: The EWGCOG's Reasonable Progress Policy allows for the efficient and effective monitoring of project implementation status following the Board's adoption of the TIP.

TIP Modification Process

Background: 23 CFR 450.326 addresses modification of the TIP, stating that the TIP can be modified at any time, subject to the following conditions:

- In nonattainment or maintenance areas, the adding or deleting of projects that affect emission levels requires a new conformity determination.
- Changes that affect fiscal constraint require amendment of the TIP
- Amendments require public review and comment

Administrative modifications allow minor changes without such actions.

SDOT and LPA sponsored Federal-aid projects located in the St. Louis metropolitan planning area must be programmed in the EWGCOG TIP and the STIP before federal aid highway program funds may be obligated and the work authorized through the execution of a Federal-aid Project Agreement.

Observation: The EWGCOG recognizes two types of TIP modification actions; an amendment and an administrative modification. An amendment requires a Board approval action. An administrative modification is provided to the Board for information purposes. A member agency that requests a TIP modification is required to provide sufficient support documentation to the EWGCOG that reviews the request to determine if it is an amendment or an administrative modification action. The EWGCOG also ensures the demonstration of fiscal constraint and in the case of a new project, determines whether the project is regionally significant and requires a new conformity determination finding and a special public comment period. Examples of administrative modifications to the TIP include; the shifting of funding between phases of a currently programmed project, a minor change of scope or the correction of typographical and other minor errors.

An amendment action is first presented to the Executive Advisory Committee (EAC). At the conclusion of EAC review and approval and the public involvement process, staff makes a recommendation to the Board of Directors for review and approval. Following the Board approval action, the approved amendment information package is transmitted to the appropriate SDOT along with the EWGCOG's request to secure required state approvals to incorporate the amendment into the STIP by reference. The SDOT, after securing the Governor's approval, submits the STIP amendment for the TIP amendment to the FHWA and FTA with the request for ONE DOT approval.

A summary of all modifications is produced quarterly in the form of a TIP supplemental document. These quarterly supplements are distributed to FHWA, FTA, US EPA, MoDOT, IDOT, MoDNR,

and IL EPA for information purposes. Supplements will be distributed more frequently than quarterly should there be a large number of modifications since the last supplement. The supplement package includes details regarding Board approved amendments, the identification of administrative modifications and the description of why the changes were made.

Finding: The EWGCOG's has clearly outlined criteria and procedures for amending the TIP, including definitions, criteria, and procedures for administrative amendments. This information is available and understandable to the public.

EWGCOG's Leadership

Observation: A large Mississippi River Bridge project, known as the Poplar Street Bridge (PSB)/I-55/I-70 Interchange project was submitted by MoDOT for inclusion in the FY2012-2015 TIP. When strong concerns about the project's design were expressed by some of the Illinois EWGCOG Board members, the Board of Directors approved the FY 2012-2015 TIP without the project.

As MoDOT continued developing the Poplar Street Bridge (PSB)/I-55/I-70 Interchange project in its original configuration, concern related to the removal of the eastbound I-70 ramp continued to grow among a number of the Illinois members of the Board of Directors. Due to the regional nature of the project, and the concerns, the Board of Director's held a special meeting on May 16, 2012. At this meeting MoDOT and IDOT presented information related to the project, including the alternative concepts considered. MoDOT made it clear that if the project did not move ahead to implementation as proposed, a significant portion (\$30 Million) of the funding would go to projects outside of the St. Louis region.

At the close of the special meeting the Board of Directors directed the EWGCOG's to solicit and contract with a consultant to complete an independent study to determine if there is a potential solution that would retain both I-70 ramps along with making MoDOT's planned improvements to the I-55 ramps and to develop a report that examines the benefits, impacts, and costs of the various options.

HDR Engineering, Inc. was selected to conduct the independent review of the PSB/I-55/I-70 Interchange project and began work on July 13, 2012. The Board of Directors agreed to delay approval of the FY 2013-2016 TIP, which included the PSB/I-55/I-70 Interchange project, until their September Board meeting which would occur after the independent review of the PSB/I-55/I-70 Interchange project was to be completed.

The results of the independent review of the Poplar Street Bridge/I-55/I-70 interchange project were presented at a Special Board of Directors meeting on September 14, 2012. The HDR recommendations were well received by the Board of Directors and the SDOTs. The FY2013-2016 TIP was approved by the Board of Directors at their regularly scheduled meeting on September 26, 2013 with the understanding that the recommended improvements identified in Phases 1 and 2 of the Poplar Street Bridge Independent Review would be amended into the TIP in January 2013. On February 6, 2013, the ONE DOT approved the MoDOT STIP amendment for the TIP modification that included the addition of the Poplar Street Bridge Project.

Commendation #8: The EWGCOG is commended for its strong leadership in facilitating the resolution of the long standing MoDOT and IDOT design issues in connection with the Poplar Street Bridge /I-55/I-70 Interchange project.

FTA/FHWA/MoDOT Planning Partnership Agreement

Observation: In Missouri the FTA/FHWA/MoDOT utilize a three party Partnership Agreement that outlines how FHWA & FTA will work together to deliver ONE DOT (FHWA/FTA) review and approval of state and metropolitan planning work products and planning certification and process reviews. This Partnership Agreement was originally developed in 2005 and was updated in 2008. The Partnership Agreement has helped FTA and FHWA to achieve the goal to deliver a single ONE DOT response to our metropolitan and SDOT partners. The FHWA Missouri Division recognizes the FHWA/FTA/MoDOT Planning Partnership Agreement to be a performance management tool that supports the objectives of our regional MOA by enhancing the quality, timeliness, and consistency of the ONE DOT service in overseeing and administering the transportation planning programs in Missouri. The Missouri Division & FTA Region VII received the 2010 Planning Collaboration Initiative Excellence Award.

Finding: The FTA/FHWA/MoDOT Planning Partnership Agreement was developed with little or no input from the EWGCOG. The FHWA Illinois Division is unfamiliar with the content and the review processes outlined in the Partnering Agreement. The Missouri Division and FTA Region VII's work product review and approval experience over the last two years has surfaced potential opportunities to improve the ONE DOT and MoDOT review and approval processes for the various EWGCOG's planning work products.

Recommendation #13 It is recommended that the FHWA Missouri Division and FTA Region VII work together with the EWGCOG and the MoDOT to identify opportunities for improving the current ONE DOT review and approval process for all applicable EWGCOG planning work products and processes.

AIR QUALITY

Background: Under the 1990 Clean Air Act Amendments (CAAA), the U.S. 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 U.S. 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.

Observation: The St. Louis transportation management area (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 regularly scheduled meetings of the Air Quality Advisory Committee (AQAC) and the Inter-Agency Consultation Group (IACG). The 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, agreement on the 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.

Conformity Managers Meeting:

On April 14, 2011 the EPA /FHWA/FTA /EWGCOG Manager's Meeting was held for the purpose of the Federal, State and local program managers collaboratively identifying and discussing what elements of the transportation conformity determination process in St. Louis metropolitan planning area are working well and what areas are in need of improvement. This meeting resulted in 12 "Action Items" for enhancing the delivery of the St. Louis conformity determination process. These recommendations for improving the conformity determination processes were expected to be implemented by EWGCOG, the IACG and the Federal agencies.

The Conformity Manager's at the close of the April 2011 meeting recognized that the conformity determination process in the St. Louis non-attainment area had been effective historically and designed the "action items" to refinements to the process that are required in order for the process to continue to work well given that there are new members to the IACG and that new NAAQS standards are likely on the horizon.

Baseline Assessment Review

A discretionary FHWA/FTA/EPA Baseline Assessment Review (BAR) was completed in February 2012 to determine to what extent the regional emissions analysis and transportation conformity determination process in the St. Louis metropolitan planning area is meeting the requirements of all applicable provisions of Federal law (23 USC and the 1990 Clean Air Act Amendments) and regulations (23 CFR Part 450 & 40 CFR Part 93) and applicable State laws and regulations in Missouri and Illinois. This review covered both the Missouri and Illinois portions of the St. Louis Metropolitan Planning Area (MPA) and include all facets (i.e. emissions analysis, public involvement, the IACG process, etc.) of the EWGCOG's regional emissions analysis and conformity determination process completed in connection with the TIP development, TIP modifications, LRTP development and LRTP modifications.

The Federal Review Team was made up of staff from FHWA Missouri and Illinois Division Offices, FHWA Headquarters Office, FTA Region 7, and the U.S. Environmental Protection Agency Region V and Region VII. The Review Team's work effort consisted of both office/desk and on-site review work segments. The on-site portion of the review was conducted on November

2-3, 2011.

The Review Team also assessed the extent that the EWGCOG staff and the IACG had implemented, the applicable Conformity Manager's Meeting action items, as of February 21, 2012 and recommended that all of the Manager's Meeting action items, as applicable, be implemented by April 1, 2012. This was subsequently amended to have the action items completed before May 31, 2013.

A BAR Final Report, dated March 5, 2012, documented the various components of the review. The Final Report provided an overview of the EWGCOG's conformity determination process; summarized the various discussions from the November on-site visit and provided a series of review observations, commendations and recommendations. In general, the review determined that the EWGCOG's regional emissions analysis and transportation conformity process for the St. Louis metropolitan area is being conducted in accordance with applicable requirements of sections 176 (c) of the Clean Air Act, as amended (42 U.S.C 7506 (c) and 40 CFR Part 93. The Final Report addressed to Mr. Ed Hillhouse, Director of EWGCOG, was transmitted concurrently to the MoDOT, IDOT, MoDNR and the IEPA.

Baseline Assessment Review (BAR) Follow-up Review:

In September 2012 the FHWA initiated a follow-up work activity to determine the status of the EWGCOG, SDOT(s), IACG, ONE DOT and EPA's efforts to implement the 18 recommendations presented in the Final Report for the BAR of the EWGCOG Regional Emissions Analysis and AQ Conformity Determination Process. An excel spread sheet was created for showing the implementation status of each of the BAR recommendations. The FHWA worked closely with the EWGCOG, IDOT & MoDOT to establish the status of all completed and planned work to implement the BAR recommendations. A meeting was held at the EWGCOG's office on 11/28/12. The purpose of the round table meeting was to facilitate the collaborative effort to finalize the implementation status of each of the 18 recommendations. In cases where implementation was completed, the group sought to document the extent, if any, of realized process and/or work product improvements. In cases where implementation was recognized as a "work in progress", the group sought to establish an accurate timelines for implementation completion.

A second teleconference meeting was held on 12/13/12 specifically for the group's discussion of the status of all efforts to implement the Manager's Meeting action items (BAR Recommendation #18). The BAR Follow-up Review work effort will be completed on or before 5/31/13.

Finding: The EWGCOG's regional emissions analysis and transportation conformity process for the St. Louis metropolitan area's metropolitan transportation plan and transportation improvement program in the St. Louis nonattainment and maintenance areas is being conducted in accordance with applicable requirements of section 176 (c) of the Clean Air Act, as amended (42 U.S.C 7506 (c) and 40 CFR Part 93. The EWGCOG's conformity determination process provides adequate representation and input from all levels of state and local government and individual groups on the air quality and transportation needs of the metropolitan area. Overall, the EWGCOG's transportation and air quality planning activities provide for a transportation planning process that results in the support and development of transportation investments for the entire bi-state metropolitan area.

Commendation #9: The EWGCOG staff and the IACG members are commended for implementing

the majority of the Air Quality Program April 2011 Manager's Meeting “action items” and the FHWA/FTA/EPA AQ Baseline Assessment Review recommendations; for improving the overall AQ conformity determination process in the St. Louis metropolitan planning area.

Congestion Mitigation and Air Quality (CMAQ) Program

Observation: The CMAQ Project Development process includes a collaborative project selection process 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 program guidelines. The CMAQ Project Development process allow for a FHWA, EPA Region VII and FTA Region VII review for eligibility determination early in the project selection process. EWGCOG staff lead the 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. Emission reduction estimates are required for every submittal and consideration is provided to short range and long term SIP objectives. The cost effectiveness of each proposal is then developed to compare all proposed projects by the common standard of cost per unit of benefit. Beginning with the current TIP the cost per ton of emissions reduced for hydrocarbons and oxides of nitrogen has been developed for each project to generate the cost-effectiveness. This practice will continue for future CMAQ project selections. The EWGCOG is confident that the current procedures used to develop emission benefits for CMAQ projects is resulting in the identification of the best projects that will reduce emissions throughout the region.

The Missouri TPC reviews and provides concurrence in the EWGCOG’s project rankings before the projects for the proposed CMAQ program are submitted to the Board of Directors for their final approval. The Illinois CMAQ project applications are reviewed and ranked by committees of elected officials established in each of the three Illinois counties before the project ranking is submitted to the Illinois TPC for review for concurrence and the Board of Director’s for final approval. The current FY2013-2016 has programmed CMAQ projects through FY 2014.

The EWGCOG’s considers project quality to be dependent on the types of projects submitted for consideration, not the amount of funding available. They cite no evidence or guarantee that “better” projects are selected when programming one year of CMAQ funding versus multiple years of funding. If the quality of projects (cost/ton emission reduced) diminishes significantly when programming multiple years of funding there is no obligation to commit all of the funds that are requested.

The MoDOT and IDOT are required to develop CMAQ Annual Reports that reflect all of the projects for which CMAQ funds were obligated in the last federal fiscal year (FFY) and include 1) all projects administered by FHWA for which there were CMAQ obligations in the past FFY, and 2) all transfers to FTA or other Federal agencies during the past FFY. SDOT’s are encouraged to provide descriptive project-level information and air quality impacts. It is expected that the MoDOT and the IDOT work together with the EWGCOG to develop and input and enter the data for the St. Louis area. The FHWA Division’s review and approve the reports in a web-based CMAQ Tracking System.

Finding: The EWGCOG delivers a CMAQ program, guided by established project development and selection guidelines, that facilitates the selection and implementation of cost effective and emission reducing projects.

New MAP-21 Requirements

Background: MAP-21 requires MPO serving a transportation management area with a population over 1 million people representing a nonattainment or maintenance area to have a CMAQ performance plan that:

- Includes an area baseline level for traffic congestion and on-road mobile source emissions for which the area is in nonattainment or maintenance,
- Describes progress made in achieving the performance targets, and includes a description of projects identified for funding under this section and how such projects will contribute to achieving emission and traffic congestions reduction targets.

Observation: The EWGCOG's does not currently have a CMAQ Performance Plan. This MAP 21 requirement does not call for TMAs to have an adopted CMAQ Performance Plan until October 2014.

Finding: EWGCOG should work closely with FHWA and FTA in the development of the Performance Plan.

TRANSPORTATION SYSTEMS MANAGEMENT

Congestion Management Plan

Background: Federal legislation (*23 U.S.C. 134(k)(3)*) and regulations (*23 CFR 450.320(a)*) require a Congestion Management Process (CMP) in TMAs. The Federal regulations require the transportation planning process in a TMA to address congestion management through a process that provides for safe and effective integrated management and operation of the multimodal transportation system based on a cooperatively developed and implemented metropolitan-wide strategy, of new and existing transportation facilities eligible for funding under title 23 U.S.C. and title 49 U.S.C. Chapter 53 through the use of travel demand reduction and operational management strategies.

Observation: The 2009 Federal Certification Review identified the fact that the EWGCOG did not have a functioning CMP that met the requirements of 23 CFR 450.320. The Review's Final Report included the recommendation that the EWGCOG develop and adopt an updated CMP on or before adoption of their FY2011-2014 TIP in July 2010.

The EWGCOG established a Congestion Management Committee (CMC) for the purpose of guiding the CMP development process. Representative and participating members of the CMC included principal public stakeholders: Illinois Department of Transportation (IDOT), Missouri Department of Transportation (MoDOT), Metro Public Transit Agency, Federal Highway Administration (FHWA), and the Federal Transit Administration (FTA). EWGCOG is hosted the first CMC meeting on July 22, 2011.

The FHWA completed a formal review of a CMP draft version on 10/11/2012 that concluded with the presentation of a summary of findings and recommendations. The FHWA, EWGCOG, MoDOT

and IDOT met on 12/4/2012 for the purpose of discussing the FHWA’s review recommendations and to collaboratively establish action plan for completing the ongoing collaborative effort to finalize a new CMP for the St. Louis metropolitan planning area. The FHWA’s goal for the CMP meeting was to re-energize the EWGCOG CMP development work effort over the weeks leading up to the certification review on-site session while at the same time free up the on-site session time for discussing various other critical elements of the overall metropolitan transportation planning process.

One of the outcomes of the meeting was the development of the following “action plan timeline” for the EWGCOG’s effort to complete the task of updating the CMP.

CMP Proposed Development Schedule:

December 4, 2012	Congestion Management Process (CMP) Meeting with State and Federal Partners
December 2012 – March 2013	Develop internal draft of CMP and share with Congestion Management Committee and FHWA representatives - - reaching understanding and agreement on established CMP Objectives and directly related measures of transportation system performance
April 2013 – May 2013	Present draft CMP to Congestion Management Committee, Transportation Planning Committee, Executive Advisory Committee, and Board of Directors
June 2013 – July 2013	Conduct public involvement (June/July) and present to EWGCOG Board of Directors for approval (July) - - public involvement for the CMP will be done at the same time as involvement for the TIP and AQCD and all three documents will be presented to the Board of Directors for approval in July.

The CMP development and implementation work activities with the CMC along with the advancement of ITS coordination and application are defined under the FY2013 UPWP work element: Integrated Transportation System Management.

Actual M&O strategies and related performance measures are being included in the CMP. Principal to the CMP will be the ongoing framework for operations coordination including transportation data, performance indicators, Management and Operations (M&O) strategies, and signal control interoperability and application. The operations community through the CMC will continue to play a central role in the development and implementation of CMP objectives, performance measures, M&O and related congestion mitigation strategies.

With a functioning CMP, the region will work to achieve consistency of ITS investments in transportation facilities and further advancing the concept of shared interoperability. The long-term goal is coordination and consistency of signalization software for regional arterials and the ability to collect and utilize system performance data in mitigation congestion and the project development process.

Corrective Action: The EWGCOG must have a functioning Congestion Management Process

(CMP) developed, established, and implemented as part of the metropolitan transportation planning process on or before September 30, 2013. The CMP must meet the requirements outlined in 23 CFR 450.320, including coordination with transportation system management and operations for activities.

Intelligent Transportation Systems

Background: 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.

Observation: The St. Louis Regional ITS Architecture was completed in 2005 consistent with the timeline established in the Final Rule for ITS Architectures. The Regional ITS Architecture focuses on the application and implementation of communications technology in addressing congestion and transportation incident obstacles in a technologically coordinated way. One of the goals of the ITS Architecture Program is the coordination among stakeholders and jurisdictions. The Regional ITS Architecture defines the system components, key functions, organizations involved in developing architecture, and the type of information to be shared between organizations and between parts of the system. The architecture successfully engages the various stakeholders (SDOTs, transit operators, law enforcement, EMS, etc.) and creates a shared understanding of how a systematic approach can create a simple, yet effective, method for communicating and working together.

Gateway Guide serves as the region's ITS Program. The program provides real-time traffic information to motorists and emergency services, thereby allowing motorists to make an informed decision on the best route to travel and helping emergency services (including Motorist Assist and the towing industry) to remove roadway incidents in a quicker fashion. The program is a regional partnership between MODOT, IDOT, EWGCOG and Metro.

The established Traffic Management Centers (TMC) are the principal ITS architecture framework that have been established and implemented with great success in the St Louis region by both MODOT and IDOT. On the Missouri side of the region, the TMC is part of the Gateway Guide framework, which serves as a one-stop shop for addressing travel needs and choices. The TMC serves to monitor the roadways, respond to congestion and incidents and deliver information to travelers via a number of means, including web sites, dynamic message signs and highway advisory radio. New ITS applications and technologies are being developed and implemented as part of the region's priority of mitigating incident related nonrecurring congestion and bottleneck issues. ITS enables people and goods to move more safely and efficiently throughout the St. Louis metropolitan planning area.

Updates to the ITS Architecture are required periodically as ITS technologies and policies evolve. EWGCOG is responsible for updating and tracking changes to the ITS Architecture Plan and components. There have been no updates to the ITS Architecture since it was developed in 2005. Due in great part to budget constraints and reduced role in transportation data collection for jurisdictions and stakeholders in the region, there hasn't been an expanded role for new ITS partners

or applied technology.

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.

Recommendation #14 It is recommended that the SDOTs and the EWGCOG's partner together to deliver a comprehensive update to the ITS Architecture on or before the close of calendar year 2014.

PUBLIC INVOLVEMENT PROCESS

Background: Public involvement is a mandated core MPO activity that supports the overall metropolitan area transportation planning process and development of all key MPO products. 23 CFR 450.316 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 all interested parties. Additionally, it is required that a documented public participation plan (PPP) be 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.

Observation: The current EWGCOG Public Involvement Plan (PIP) was adopted in June 2007. This plan provides an overview of the agency, the challenges of effective public participation, the goals of the agency, levels of involvement, and staff training. The PIP identifies and discusses different levels of community participation including public information, consultation, involvement, collaboration, and empowerment. In the 2009 certification review, it was observed that the PIP would benefit from additional specificity needed to strengthen its consistency with the requirements to include a description of explicit procedures, strategies, and desired outcomes for the ten listed areas called out in 23 CFR 450.316 (a). A recommendation was presented for the EWGCOG to complete the effort to update the PIP in consultation with all interested parties. At the time of the on-site roundtable sessions the EWGCOG had not updated their PIP. In practice, the EWGCOG's public participation effort continues to meet the intent of the regulatory requirements for providing the public reasonable opportunities to be involved in the metropolitan planning process. However, in recognition of the PIP as a tool that provides direction and guidance to those seeking participation with the planning process and a resource for how to measure the effectiveness of the public participation effort, it remains critically important that the PIP be updated to include a description of explicit procedures, strategies, and desired outcomes for the ten listed areas.

The EWGCOG's exceptional effort to consult, as appropriate, with State and local agencies responsible for land use management, natural resources, environmental protection, conservation, and historic preservation concerning the development of the Transportation Plan is highlighted in the Sustainability/Livability section of this report.

EWGCOG actively seeks out the viewpoint of underserved populations as well as the issues and needs of their communities and is committed to building strong relationships with the workforce and economic development and social service communities. These strengthened relationships that reflect enhanced trust levels and credibility allow the EWGCOG to gain a better perspective of the

transportation and community issues through the eyes and ears of low-income persons and interest groups. The organizations and groups that serve minority households, low income, older adults and those with disabilities have the opportunity to directly serve on the EWGCOG's advisory committees and receive their information mailings. The EWGCOG has developed and maintained a contact resource list of organizations and works to create personal connections with a variety of regional organizations in housing, community development, economic development, and social services and seeks their assistance in the collaborative effort to reach out to communities that may not be familiar with what EWGCOG does and how it can impact them.

Finding: The EWGCOG's public participation work effort is a proactive process that actively encourages broad participation and full public access to key decisions, and support for early and continuing public involvement in developing all planning products, including the RTP and TIP.

Recommendation #15: It is recommended that the current Public Involvement Plan (PIP), 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 and should be completed by the end of calendar year 2013. The name of the updated document should be changed to the Public Participation Plan.

CIVIL RIGHTS

Title VI Compliance

Background: 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.

Observation: Since the 2009 certification review, the EWGCOG's has developed a well-defined Title VI policy and complaint procedure that outlines the roles and responsibilities for prompt processing and disposition of Title VI complaints received by EWGCOG in connection with all projects (local and SDOT sponsored). The EWGCOG now employs a staff of four people that are responsible for ensuring compliance with Title VI requirements. The EWGCOG has proactively facilitated the training of several staff members and has embraced the importance of the need for all staff members' awareness of the agency's Title VI responsibilities. A copy of the Title VI Plan is available for viewing at: <http://www.ewgateway.org/AboutUs/BusinessWithUs/TitleVIPlan-August2011.pdf>.

In the last round of developing and selecting projects for STP sub-allocated (STP-S) category funding and inclusion in the TIP, the EWGCOG's application included the requirement for the project sponsor to make available to the EWGCOG, a copy of the agency's Title VI plan. Submitted plans were passed through to the MoDOT and the IDOT for information purposes. Through this Title VI plan request, the EWGCOG's has learned that many local member agencies do not have adopted Title VI Plans or a sound knowledge of the Title VI program requirements.

In November 2012, the EWGCOG's hosted a day-long workshop on Title VI and its related

requirements that was attended by almost 100 staff and elected officials throughout the St. Louis Metropolitan Region. Presenters and panelists from U.S. Department of Justice, FHWA, U.S. Homeland Security and HUD, helped participants better understand the Title VI requirements. Program evaluations were overwhelmingly positive along with feedback that more training needs to be made available on this topic. It is the EWGCOG's goal to host another training session sometime in 2013.

Commendation #10: The EWGCOG is commended for their proactive effort to strengthen their Title VI program and for hosting Title VI Workshop on November 14, 2012.

Annual Self-Certification

Background: Through the self-certification process set forth in the joint FHWA/FTA planning regulation, as required by 23 CFR 450.218 and 450.334, MPOs and SDOTs must affirm that their respective programs and activities comply with the Title VI nondiscrimination laws and regulations, at least every four years, or when an updated or amended TIP or STIP is submitted to FHWA and FTA for joint approval.

Observation: The EWGCOG and the MoDOT and IDOT affirm that the St. Louis metropolitan planning program and activities comply with the nondiscrimination laws and regulations, including Title VI, as part of their execution of an Annual Self Certification document. This certification document is signed each year by the SDOTs and the EWGCOG and incorporated into the TIP that is updated annually.

Local transit operators are reviewed for Title VI compliance during their triennial reviews with FTA.

There have been no formal Title VI complaints related to transportation in the St. Louis metropolitan region since the 2009 certification review.

Finding: The EWGCOG's transportation planning process is being carried out in compliance with Title VI of the Civil Rights Act 1964 and related statutes and regulations in all programs and activities and in a manner that ensures that members of protected groups identified under Title VI and other nondiscrimination statutes and those traditionally underserved by transportation services/facilities, are provided with full opportunities to engage in the regional transportation planning process.

Environmental Justice

Background: Executive Order (E.O.) 12898, issued February 11, 1994, provides that "each Federal agency shall make achieving Environmental Justice part of its mission by identifying and addressing, as appropriate, disproportionately high or adverse human health and environmental effects of its programs, policies, and activities on minority populations and low-income populations . . .".

The planning regulations, at 23 CFR 450.316(a)(1)(vii), require that the needs of those "traditionally underserved" by existing transportation systems, such as low-income and/or minority households that may face challenges accessing employment and other services, be sought out and considered.

Observation: Using demographic data from the 2009 American Community Survey, the EWGCOG has identified that racial and economic disparity continues to be a challenge for the region. The EWGCOG defines Environmental Justice (EJ) areas as places that have high concentrations of one or more of the following populations: elderly, disabled, minorities, persons in poverty, and zero vehicle households. Although the Executive Order on Environmental Justice only requires examining populations with high concentrations of minorities and poverty, the EWGCOG's has chosen to expand its analysis to encompass those five demographic groups in an effort to ensure parity for all citizens within the region. Since the 2009 certification review, the EWGCOG has strengthened its efforts to assess and document how transportation plans and investments affect these protected populations.

The distribution of benefits and burdens across all socioeconomic groups were considered in several ways throughout the development of the RTP 2040 investment plan. All projects reviewed for inclusion in the plan were evaluated for the level at which they impacted an EJ community, supported redevelopment and enhanced transit. This coupled with the EWGCOG's Housing + Transportation analysis, helped further define the impacts of projects on identified locations of low-income and minority populations. The "access to opportunity" was also recognized as one the seven evaluation measures used in the development and selection of projects for the RTP 2040.

The development of a multi-dimensional public engagement process that emphasized participation from different socioeconomic and ethnic minorities was another tool that the EWGCOG's utilized to gain a better understanding of the impacts of the regional transportation system on its different users. Invitations to participate in the public engagement process were communicated through numerous media outlets, including but not limited to mailings, postings at meetings, website notifications, notification to committee members, and phone calls to the leadership of organizations serving underserved populations. Underrepresented communities were targeted by notifications and requests to participate sent to some of the organizations that represent them, including the Urban League, Area Resources for Community and Human Services (ARCHS), International Institute, and Metropolitan Congregations United (MCU). This outreach effort provided EWGCOG valuable public input from a broad array of perspectives, which helped define the current needs of transportation users and shape the development of the final plan.

Finding: The EWGCOG's strong and ongoing effort to consider Title VI protected populations throughout the transportation planning process ensures that traditionally underserved populations are not being neglected or discriminated against by the EWGCOGs directly, its individual members, or by the region collectively on a broader scale.

Limited English Proficiency

Background: Executive Order 13166, issued August 11, 2000 directs federal agencies to evaluate services provided to Limited English Proficient (LEP) persons and implement a system that ensures that LEP persons are able to meaningfully access the services provided consistent with and without unduly burdening the fundamental mission of each federal agency. Additionally, each federal agency shall ensure that recipients of federal financial assistance provide meaningful access to their Limited English Proficiency applicants and beneficiaries.

Observation: The following LEP resources have been developed by the EWGCOG's since the last 2009 certification review:

- (a) Language identification flashcard sheet that allows an LEP person to identify their spoken language and obtain an “I Speak” card.
- (b) “Commitment to Limited English Proficiency (LEP) Persons” brochure.
- (c) “Your Rights Under Title VI” brochure. (now available in Spanish and Bosnian)
- (d) “Environmental Justice and What it Means” brochure.
- (e) “ADA” brochure.

The EWGCOG prominently displays these listed resources at their public meetings, and in all EWGCOG’s conference rooms lobby waiting area. All this program resource information is also available on the EWGCOG’s website along with the Google translate program feature to assist the LEP community. As noted above, the EWGCOG’s has produced information brochures in Spanish and Bosnian and plans to produce in other languages, as deemed appropriate, even though the St. Louis area does not surpass the thresholds that trigger the requirement to do so.

There is a MoDOT hosted LEP Training Workshop tentatively scheduled to be held in St. Louis in April 2013. The EWGCOG is committed to championing the outreach effort to inform their member agencies about this training opportunity.

Finding: Though to date, the EWGCOG has not received a request for translation nor had any LEP persons attend any public meeting, the EWGCOG is fully prepared to meet LEP persons’ needs and to eliminate language obstacles when they arise.

Land Use /Livability

Background: While current statute and transportation planning regulations do not make direct references to land use or livability planning, the transportation planning process is required to be coordinated with “planned growth” and similar activities, as those that exist within the region. In addition, MPOs and SDOTs must, when appropriate, consult with other agencies that have certain responsibilities for land and other resource management.

System of Plans

Observation: The EWGCOG has limited legal authority to effectively integrate regional land use planning into local development decision making processes The System of Plans project is the EWGCOG’s work effort to enhance the level of coordination of transportation planning projects. This work effort revealed a lack of updated land use plans from many municipalities, and a lack of plans in digital formats that can be easily transferable. The EWGCOG collected and digitized city and county zoning maps where land use plans were not available or where plans were more than 20 years old. The System of Plans now includes GIS files representing more than 65 future land use plans and zoning maps. These data layers have been made available to other agencies for the purpose of enhancing inter-agency coordination in the delivery of transportation planning projects. The St. Louis Regional Data Exchange ("data portal") is an interactive web interface that that will allow local governments to share and update their land use plans and zoning files. The EWGCOG encourages local governments to use the portal to create a dynamic, frequently updated System of Plans.

Commendation #11: The EWGCOG is commended for developing a The System of Plans that includes GIS files representing more than 65 future land use plans and zoning maps. These data layers have been shared with other agencies to enhance the coordination of land use plans, policies,

and strategies throughout the region.

Land Use Evolution and Assessment Model (LEAM)

Observation: The Land Use Evolution and Assessment Model (LEAM) is used to project changes in land use and population. The model divides the region into a series of 30 meter x 30-meter cells. Each cell is assigned a development probability score based primarily on proximity to interstate interchanges, proximity to major arterials, proximity to employment, and physical steepness or slope. Major inputs required are regional population and employment projections, anticipated road network changes, and areas blocked off from future development, such as parks. The model performs simulations that project changes in land use, and then converts land use changes into future population and employment levels.

As part of the RTP development, land use impact and development probabilities were assessed using the LEAM model. Separate analyses were performed for each of the three scenarios in the RTP: no-build, fiscally constrained and full-build. The EWGCOG's is now using online interface to submit customized scenarios. The Regional Plan for Sustainable Development (RPSD) made use of the online interface as part of the scenario planning exercise.

Planned work in 2013 includes calibration tests to determine whether the weights used to assign probability scores require updating. It is anticipated that these tests will involve comparing LEAM outputs with changes observed in the U.S. Census and the two-year land cover change file obtained from the Missouri Resources Assessment Partnership (discussed in the ecological framework section). Also anticipated in the next year are improvements in online tools for scenario analysis and visualization.

Commendation #12: The EWGCOG is commended for its utilization of the Land Use Evolution and Assessment Model (LEAM) to project changes in land use, population and employment that are utilized in the St. Louis area's Regional Transportation Plan 2040 and the development of an online interface that can now be used by EWGCOG staff to submit customized scenarios.

Regional Ecological Framework

Observation: In 2008, the EWGCOG partnered with the Missouri Resource Assessment Partnership (MoRAP) at the University of Missouri-Columbia to develop a Regional Ecological Framework (REF). The REF implements the new environmental strategies identified in the RTP 2040 and augments the region's ability to develop regional and local, ecosystem-level planning approaches to avoid, minimize, and mitigate the environmental impacts of existing and future infrastructure investments. The EWGCOG and MoRAP have worked together in collaboration with federal and state resource agencies to map ecologically significant areas in the eight county bi-state region, to support mitigation planning at both landscape and site specific scales. State and local conservation plans and maps as well as inventories of natural and historic resources were used in the development of the ecological significance layers as well as the conservation opportunities data layer. Data from developed ecological significance data layers was incorporated into the RTP 2040 development process. The project-level data layer was used in the Project Evaluation Framework, which is comprised of seven criteria ranging from safety and congestion to access and sustainable development. The regional-level data layer was used to conduct a stress analysis of the established RTP 2040 investment priorities (planned transportation improvements) on ecologically significant areas through the use of the EWGCOG's land development-forecasting model. (LEAM)

The EWGCOG is effectively working with MoDOT and IDOT to integrate the ecological spatial tools into their planning and project development work. In doing so, projects in the early planning stages will be evaluated against the ecological significance layer to determine possible impacts. In order to determine compatibility, a pilot project will be run through the transportation planning and NEPA process. As part of the pilot project, regulatory and resource agencies will use the geospatial tool in their project level review procedures. The activity will determine the applicability of the tool for regulatory and resource agencies.

Commendation #13: The EWGCOG is commended for their effort to develop the Regional Ecological Framework (REF) and their utilization of the REF to enhance the region's ability to develop regional and local, ecosystem-level planning approaches to avoid, minimize, and mitigate the environmental impacts of existing and future infrastructure investments.

Ecological Approach to Infrastructure Development Initiative

Observation: The EWGCOG has partnered with Federal, State and local resource management and regulatory agencies that work within the region, and led the effort to develop an innovative process called the Ecological Approach to Infrastructure Development Initiative. Through this process, the area's most valuable natural resources have been identified, plans and data have been shared between organizations, and overlaps in plans have been identified in order to better inform transportation planning decisions for the region. New strategies to develop an ecological approach to planning, including creating the necessary data and tools, were included in the RTP 2040. Addressing environmental impacts in the RTP 2040 planning stage allowed the region to highlight and analyze the impact of transportation projects on the ecologically significant resources in the region that need to be preserved.

The EWGCOG has developed a web-based interface that provides a forum for regional data sharing, communication and integrated planning. Partnerships have been established with state and federal resource agencies, non-governmental organizations and other local regional stakeholders that are involved in conservation and preservation efforts.

The Ecological Initiative is also used to support the implementation of ecosystem based mitigation, multiple-project mitigation, and innovative project specific/low impact design mitigation strategies. The EWGCOG has partnered with the MoRAP to create the ecological significance GIS data layers and to develop wetland mitigation and wetland restoration data. The compilation of this data is a step toward extending compensatory mitigation options by offering ways to evaluate alternatives for off-site mitigation and/or out of kind mitigation. The EWGCOG highlights the Ecological Initiative's success in creating a tool to be used in evaluating long range plan projects' potential impact on ecologically significant areas in the region and its goal to facilitate the application ~~the~~ data more directly in the project review or NEPA phase of projects and to coordinate with regulatory and natural resource agencies to preserve and restore natural resources in the region.

Finding: The EWGCOG is commended for leading the Ecological Approach to Infrastructure Development Initiative effort that brought Federal, State and local resource management and regulatory agencies together to collaboratively work together on data development, mapping and the application of products and tools both now and in the future. This collaborative work effort has resulted in better informed transportation planning decisions that improve habitat connectivity and enhance wildlife conservation, while needed infrastructure is developed and built.

Great Streets Initiative Projects

Observation: The EWGCOG launched the Great Streets Initiative in 2006 to help communities expand the way they think about streets and encourage community leaders to use their streets to create connections and centers of economic and social activity. This initiative was funded by a Transportation Community and System Preservation Program grant. Streets are community resources, and the St. Louis Great Streets Initiative guides communities on how to make streets more than just conduits for vehicular travel. Great streets in St. Louis emphasize the safe coexistence of all modes of travel, including vehicular, pedestrian, public transit and bicycling. This requires planners, designers, and developers to think differently about their streets and to recognize that moving automobiles is still an essential function of a great street; it is just not the only function.

In 2006, the Council retained a team lead by CH2M Hill to develop regional awareness and an extensive best practices based reference tool (the Great Streets Guide at www.greatstreetsstlouis.net) and to aid in soliciting applications, selecting, and refining scope for an initial round of demonstration projects. Four projects were selected for planning assistance. The EWGCOG worked with the local project sponsors to select consultant teams. Enhancement and ARRA funding has been used for planning, final engineering, and implementation of the original four projects. Construction for two of the Great Streets projects is scheduled to be completed in 2013 and in 2014 for the other two projects. In 2012 there were three new Great Street Initiative projects reviewed and selected for funding by a steering committee and EWGCOG. The planning for these projects is anticipated to be completed in June 2013.

Considering how street design choices affect the pedestrian experience and the abutting land uses is central to the St. Louis initiative. It requires the careful and intentional creation of an environment that suits walking, bicycling, and transit; and it requires taming traffic in a way that still allows for mobility, but at speeds that are safe and not threatening to pedestrians.

The EWGCOG encourages all communities to incorporate the Great Streets principles into their roadway projects. Through the TIP application process for suballocated STP funds, project sponsors are encouraged to include a discussion of how the project follows the Great Streets principles. The result has been more communities incorporating Great Streets principles into their roadway improvement projects.

Commendation #14 The EWGCOG is commended for developing and delivering their Great Streets Initiative program that provides the opportunity for communities to receive planning assistance in designing great streets and for championing the integration of great street principals into the overall metropolitan planning process.

St. Louis Regional Plan for Sustainable Development

Observation: The EWGCOG has partnered together with 11 consortium partners and 23 other organizations to deliver a three year initiative to develop a regional plan for sustainable development (RPSD) for the St. Louis metropolitan planning area. The estimated total cost of the work effort is \$8.2 million and is being funded through the U.S. Department of Urban Development (HUD), USDOT and USEPA. Match funding is being provided by the 11 consortium partners.

The goal of the three-year planning process is to create a regional plan that builds the capacity of local and regional leaders to implement sustainable practices by sharing knowledge, best practices,

and resources; connecting local, regional, state and federal planning efforts; and making federal and local investments more effective and efficient. There are four committees that involve over 100 members who are working collaboratively to engage in an inclusive and comprehensive regional planning process. A Steering Committee will influence the overall vision for the plan, set goals related to the scope of the completed plan, and ensure the plan is a tool that can be used by communities region-wide.

The goal is for the RPSD to be a flexible guide inclusive of a variety of options to enhance sustainability. Following the RPSD's approval by the EWGCOG Board of Director's, the RPSD's key principles will be coordinated with the region's long-range transportation plan. Agencies throughout the region will also be encouraged to adopt the RPSD into their planning processes.

Commendation #15: The EWGCOG is commended for their ongoing partnering effort to develop a regional plan for sustainable development (RPSD) for the St. Louis metropolitan planning area.

Safety and Security in Transportation Planning

Safety

Background: SAFETEA-LU requires MPOs to consider safety as one of eight planning factors. As stated in 23 CFR 450.306, the metropolitan transportation planning process provides for consideration and implementation of projects, strategies, and services that will increase the safety of the transportation system for motorized and non-motorized users.

23 USC 148 established a core safety program called the Highway Safety Improvement Program (HSIP) which introduced a mandate for a coordinated Statewide Highway Safety Improvement Plan (SHSIP) that provides a comprehensive framework for reducing highway fatalities and serious injuries on all public roads.

23 CFR 450.306 (h) states that the metropolitan transportation planning process should be consistent with the SHSP, and other transit safety and security planning and review processes, plans, and programs as appropriate.

23 CFR 450.322 (h) encourages the inclusion of a safety element in the MTP that incorporates or summarizes the priorities, goals, countermeasures, or projects for the MPA contained in the SHSP, as well as (as appropriate) emergency relief and disaster preparedness plans and strategies and policies that support homeland security (as appropriate) and safeguard the personal security of all motorized and non-motorized users.

Safety also appears in the Metropolitan Transportation Planning rule as a consideration in the CMP (450.320), Development and Content of the MTP (450.322), and Development and Content of the TIP (450.324).

Observation: Safety is a high priority area for EWGCOG and its planning partners. A collaborative process among key planning and safety professionals (e.g., transit operators, bike/pedestrian specialists, enforcement officers, emergency medical services managers, data managers, motor carriers, and traffic operations planners) in the development of the long-range transportation plan and the TIP ensures the consistency of safety between the RTP 2040, TIP, and

the SHSP. The EWGCOG safety policies, recommendations, and goals are outlined in the RTP 2040 and the TIP. Safety and security are one of the five factors identified as key measures of the state of the region's transportation system performance. The RTP 2040 safety and security principle includes maximizing safety in everyday usage and securing the system against catastrophic acts are prime considerations for transportation planning and investment decisions. The importance of integrating safety into the EWGCOG's planning process is reflected in the evaluation measures used to select projects for the RTP and the TIP, and in the thorough evaluation of safety issues in corridor and subarea studies.

For projects proposed for inclusion in the TIP, the safety evaluation process is point-based. Both processes include safety measures that are evaluated and given priority consideration in awarding points. Projects are assigned to a primary project priority area (i.e., one of the six transportation focus areas: preservation, safety, congestion, access to opportunity, sustainable development, and goods movement) based on information provided in the project application. The "effectiveness" of the improvement is then supplemented through the project evaluation/scoring process by each additional focus area addressed. A weighting scheme developed, based on focus area priorities, is used to score a project's effectiveness.

EWGCOG's planning for region wide transportation safety has included public education, legislation and law enforcement, reducing emergency medical response time, and engineering improvements in roadways and vehicles, as well as the analysis of traffic accident fatality rates by reviewing fatal accident statistics, preparing maps showing locations of such accidents, and reviewing accidents' contributing factors. The EWGCOG continues to facilitate a coordinated regional support system to help communities in their efforts to save lives. Safety initiatives have also included extensive public communications effort using various media, including public service announcements, posters, and billboards.

EWGCOG staff attended a Safety Workshop sponsored by the IDOT Bureau of Safety Engineering. IDOT is partnering with MPO staff and local agencies to develop county level Highway Safety Improvement Plans that are specific to the individual counties and their needs related to making safety improvements to reduce crashes (BT)

Finding: Transportation safety is addressed in all of the EWGCOG's short and long range multi-modal planning processes and developed documents.

Recommendation #16 It is recommended that the EWGCOG work closely with IDOT on the development of County level Highway Safety Improvement Plans for the Illinois Counties in the MPO region.

Security

Background: Federal legislation has separated security as a stand-alone element of the planning process (both metropolitan and statewide planning). Prior to SAFETEA-LU, safety and security were combined into one planning factor. Decoupling the two concepts in SAFETEA-LU signified a heightened importance of *both safety and security* to transportation decision-making.

23 CFR 450.306(a)(3) requires the metropolitan transportation planning process to be continuous, cooperative, and comprehensive, and provide for consideration and implementation of projects, strategies, and services that will address the following factors:

(3) Increase the security of the transportation system for motorized and non-motorized users:

23 CFR 450.206(a)(3) requires each state to carry out a continuing, cooperative, and comprehensive statewide transportation planning process that provides for consideration and implementation of projects, strategies, and services that will address the following factors:

(3) Increase the security of the transportation system for motorized and non-motorized users;

The regulations also state that the degree and consideration of security should be based on the scale and complexity of many different local issues.

Observation: FHWA and FTA generally define security planning as planning related to an event that is beyond the ability of local authorities to handle and respond to an emergency. The legislation does not require an MPO to develop a security plan. Rather, each MPO is encouraged to create a local definition that fits both regional needs and addresses the security planning factor. There will always be tremendous variation among MPOs in their security planning roles, and it is critical for each MPO to determine its own value-added niche.

The EWGCOG has played the lead role in defining security planning for the St. Louis metropolitan planning area through the various modes including roadway, transit, enhancements, greenways, etc. Safety and security are one of the five factors identified as key measures of the state of the region's transportation system performance.

Urban Area Security Initiative (UASI) grant program funding for Homeland Security was made available in 2003 and 2004 to selected urbanized areas to assist in building an enhanced and sustainable capacity to prevent, respond to, and recover from threats or acts of terrorism. The EWGCOG secured this UASI funding to develop the St. Louis Area Regional Response System ("STARRS"), which is a regional organization developed to coordinate planning and response for large-scale critical incidents in the bi-state St. Louis metropolitan region. STARRS has a formal and cooperative relationship with the governmental agencies throughout the region. The EWGCOG's serves as the STARRS fiscal agent and the two entities operate under an executed memorandum of understanding (MOU) agreement.

STARRS mission statement is to help local governments, businesses and citizens plan for, protect against, and recover from critical incidents in the St. Louis region.

STARRS has enhanced its role in security planning by taking a more all hazards approach and reaching out to the whole community, especially those with functional needs. STARRS regional planning projects such as the Regional Emergency Resource Coordination Plan (RERCP) brings a regional collaborative approach to disaster transportation planning within the St. Louis metropolitan area. The collaboration between local governments and agencies as well between MODOT, IDOT, and Metro crosses jurisdictional boundaries and enhances transportation planning in general.

STARRS has updated its working group structure to reflect the Multi-Agency Coordination Group (MAC-G) structure outlined in the RERCP Plan. Membership includes appointed representatives of the eight county elected officials, the eight emergency managers, and representatives from each of the eight primary STARRS planning subcommittees that conduct regional planning for area response disciplines.

More information regarding STARRS can be accessed at: <http://www.stl-starrs.org/>

Finding: The EWGCOG’s security planning efforts, through STARRS, facilitates enhanced institutional coordination that extends beyond the transportation community to public safety, health, environment, and other concerns.

Freight Development

Background: The 23 U.S.C. 134 and 23 CFR 450.306 specifically calls for the need for MPOs to address freight movement as part of the metropolitan transportation planning process. The scope of an MPO’s planning process must provide for consideration of projects and strategies that will...

- (1) *Support the economic vitality of the metropolitan area, especially by enabling global competitiveness, productivity, and efficiency;*
- (2) *Increase the accessibility and mobility of people and for freight;*
- (3) *Enhance the integration and connectivity of the transportation system, across and between modes, for people and freight;*

The MPO participation planning and consultation requirements under title 23 U.S.C.134 and 23 CFR 450.316 call for the inclusion of freight shippers, who are providers of freight transportation services, as interested parties that should be provided a reasonable opportunity to comment on MTPs and TIPs

Freight and Long Range Planning

Observation: Two of the Ten Guiding Principles of RTP 2040 and related strategies focus on freight and economic development:

- Support a diverse economy throughout the region
- Strengthen intermodal connections

Strategies highlighted in the RTP 2040 include the development of a strategic freight investment plan and the evaluation of the adequacy of intermodal connections and implement projects needed to correct deficiencies within the context of the regional freight study.

One of the key factors included in the State of the System report, which includes the technical work and analysis of RTP 2040, is mobility as a measure of the state of the region’s transportation system performance. The mobility measure focuses on the movement of goods within the region via four primary modes, i.e. roadways, waterways, railways and air. Following the Ten Guiding Principles, the EWGCOG included freight as one of the seven evaluation criteria used to in the development of the RTP 2040 investment plan. This criteria and subsequent metrics measure the number of shippers and receivers in the project area, the truck density in the project area and the project’s proximity to the Priority Goods Movement Network. This information is factored into the mobility measure of the state of the region’s transportation system performance and one of the evaluation criteria for project inclusion in RTP 2040. As land use changes and freight-oriented development impact the transportation system, the EWGCOG’s monitors the roadway network and adjusts the transportation model accordingly.

The EWGCOG's TIP development process utilizes six evaluation areas. One of the evaluation areas is goods movement that analyzes the number of shippers and receivers in a corridor, the percentage of commercial truck volume for roadway or bridge project and whether a project provides some specific benefit for freight movement (e.g., increase load limit on bridge, turning radius improvements, direct connections to freight intermodal centers). Proposed federal-aid highway projects involving to the roadway network associated with freight related developments, are screened through the TIP evaluation process.

Freight Program Resources

The EWGCOG's and the SDOTs are aware of the FHWA Headquarters' Freight Professional Development program and the "Talking Freight" web seminars as well as the FHWA Headquarters' Office of Freight Management and Operations (HOFM) website. These resources are recognized as value adding opportunities to share best practices and methodologies related to freight planning efforts. Additional information about the FHWA Freight management and Operations can be viewed at: <http://www.ops.fhwa.dot.gov/freight/index.cfm> .

Freight Study

The EWGCOG has contracted for a freight study that will evaluate the economic impact of the existing regional freight system and the economic growth potential associated with the freight industry based on the region's assets and market trends. Both public and private freight officials are being engaged in the study and an advisory committee has been established. Officials from shippers and receivers, trucking, rail, water and air are participating in the freight planning effort. The EWGCOG has developed a list of freight contacts that are included in all of the agency's public engagement efforts. The success of the stakeholder engagement strategies employed in the freight study will help to further expand the EWGCOG's reach into the freight community and enhance the effectiveness of future engagement activities.

The study will produce a baseline regional inventory and freight movement profile, analyze the adequacy of the region's existing freight system compared to current and future demand; identify system deficiencies, needs, and opportunities, establish goals, objectives, and performance measures for the regional freight system, identify short- and long-term investments needed to achieve those goals and objectives, evaluate the public and private costs and benefits of those investments. The study will present recommendations regarding policy and process and formulate a list of regulatory changes that are needed to enhance the region's freight movement system.

As part of the regional freight study, short and long term investments will be identified and the public and private costs and benefits of those investments will be evaluated. The land use decisions associated with freight-oriented developments factor into the evaluation of public and private costs and benefits of investments. Concentrations of warehouse and distribution space across the region will be identified with specific metrics, including locations of industrial buildings, along with supporting attributes such as building size and vacancy.

Finding: The EWGCOG's has a metropolitan transportation planning process and a RTP that leads to the development of an integrated intermodal transportation system that facilitates the efficient movement of people and goods."

Commendation #17: Review Team commends the EWGCOG's effective leadership in facilitating

the conduct of a Regional Freight Study, the formation of a regional freight advisory group and the caliber of EWGCOG's technical analysis of goods movement.

V. Conclusion

Overall, the EWGCOG's transportation planning activities provide for a transportation planning process that results in the support and development of transportation improvements for the entire metropolitan area. The EWGCOG's transportation planning process provides adequate representation and input from all levels of local government and individual groups on the transportation needs of the region. 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 (TMA), for the period April 13, 2013 to April 13, 2017, is certified as substantially meeting the requirements as described in 23 CFR Part 450 and 49 CFR Part 613, subject to EWGCOG taking action on the identified corrective action that requires the EWGCOG to have a functioning Congestion Management Process (CMP) developed, established, and implemented as part of the metropolitan transportation planning process on or before September 30, 2013. The adopted CMP must meet the requirements outlined in 23 CFR 450.320, including coordination with transportation system management and operations for activities. The MPO's progress in addressing this corrective action will be monitored by the Review Team. If the MPO has not satisfied this corrective action by September 30, 2013, restrictions on updating or amending the TIP will be imposed. This restriction will not allow Federal funds to be programmed for any project that will result in a significant increase in the carrying capacity for single occupancy vehicles (i.e., a new general purpose highway on a new location or adding general purpose lanes, with the exception of safety improvements or the elimination of bottlenecks).

VI. APPENDICES

Appendix A: 2009 Certification Review Recommendations Status Table

Appendix B: Public Meeting

Appendix C: On-Site Agenda

Appendix D: Review Guideline Questions and Answers (All)

APPENDIX A

2009 Federal Certification Review of St. Louis Metropolitan Transportation Planning Process
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<i>2009 Final Report Recommendations</i>	<i>Responsible Agency</i>	<i>Activity/Action How it is being implemented</i>	<i>Current Status</i>
<p>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.</p> <p>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.</p>	<p>MoDOT, IDOT, EWGCOG</p>	<p>The MoDOT and the IDOT have made efforts to better inform and include EWGCOG early and often in each SDOT's planning and programming efforts.</p>	<p>Ongoing implementation.</p>
<p>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.</p>	<p>EWGCOG</p>	<p>The EWGCOG continues to develop and utilize tools such as the Land Use Evolution and Assessment Model (LEAM). Work on an Ecological Approach to Infrastructure Development is underway where a comprehensive ecological database for the region is being created and a process for cooperative environmental planning among federal, state, and regional agencies is being implemented. Additionally, methods for evaluating potential ecological impacts and mitigation measures associated with infrastructure investments are being examined.</p>	<p>Implemented</p>

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<p>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.</p>	EWGCOG	<p>There are several regional freight initiatives that EWGCOG is leading or involved in. Currently EWGCOG is leading the St. Louis Regional Freight Study. The freight study will address local concerns through a systematic process of analysis, goal setting, and generalized investment planning and is engaging freight operators, facility operators, and government partners. EWGCOG is also involved in and coordinating with, several other regional initiatives including a Regional Port Working Group and the Regional Commerce and Growth Association.</p>	Implemented
<p>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.</p>	EWGCOG	<p>EWGCOG addresses the interrelationship of transit to land use and socio-economic conditions and will continue to do so. In 2009 EWGCOG conducted the Renewing the Region (RTR) initiative to assess the region's economic and social health, and to explore possible ways to enhance cooperative planning and action in the region. The initiative resulted in a set of principles (including Support Public Transportation) that was used in the development of the RTP 2040. The RTP 2040 contains significant discussion and analysis related to public transportation.</p>	Implemented – Ongoing and continuous improvement effort.
<p>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 pricing techniques such as variable timing, VMT-based, and other user fees.</p>	Metro, EWGCOG	<p>Since the 2009 review, transit service had undergone a significant reduction followed by a restoration of those services as a result of the passage of Proposition M. Metro continues to examine funding opportunities and continues to work with EWGCOG. The Metro has no intention to increase user charges.</p>	Not Implemented.
<p>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.</p>			
<p>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.</p>	EWGCOG	<p>The RTP 2040, and its technical supplement, contain discussion and analysis related to population, household, and employment projections and conducts an Ecological Stress Analysis for the Region.</p>	Implemented

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<p>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 include rising fuel costs, pricing schemes, and more efficient land use design/mix.</p>	EWGCOG	<p>The RTP 2040, its technical supplement, and the associated Air Quality Conformity Determination contain discussion and analysis related to the methodology used to determine the projected transportation demand of persons and goods. Also, as discussed at length during the 2012 FHWA/FTA/EPA Baseline Assessment Review of the Air Quality Conformity Determination process, the travel demand model is “reasonably sensitive to changes in the time(s), costs(s) and other factors affecting travel choices.”</p>	Implemented
<p>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 Maintenance and Operations (M&O) strategies complement and implement the Congestion Management Process.</p>	EWGCOG	<p>The RTP 2040, and its technical supplement, contain discussion related to management and operational strategies. As the Congestion Management Process is completed, and formally implemented, it will also demonstrate how M&O strategies complement and implement that process.</p>	Implemented
<p>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.</p>	EWGCOG	<p>During the development of the RTP 2040 the six focus areas formerly used in the transportation planning process were replaced by ten principles. Specific strategies were developed for each of the ten principles. These strategies address regional needs and enable the EWGCOG to measure progress toward its efforts to live up to the RTP’s guiding principles. All major investments analyzed for inclusion in the RTP 2040 went through an evaluation framework derived from the ten principles and the five factors identified as key measures of the state of the region’s transportation system performance.</p> <p>The EWGCOG’s is currently undertaking a significant effort related to performance measurements.</p>	Implemented

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<p>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.</p> <p>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 <i>NTOC Performance Measurement Initiative</i> as well as US DOT draft guidebooks, <i>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</i>. It is anticipated that the newly created EWG Research Department could be a valuable contributor towards development and monitoring of effective performance measurement data.</p>	EWGCOG	This recommendation has <u>not</u> been implemented. This was elevated to a Corrective Action following the 2012 Certification Review.	Not Implemented - Current ongoing work effort to develop a functioning CMP.
<p>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.</p>	EWGCOG		Not Implemented – Current ongoing work effort to develop a functioning CMP.
<p>Recommendation #9: It is recommended that the financial analysis in the EWG TIP include:</p>			

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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 M & O needs to be part of the next TIP update.	EWGCOG		Implemented
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.	EWGCOG		Implemented
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.	EWGCOG MoDOT IDOT	<p>This recommendation has been implemented in connection with MoDOT AC projects.</p> <p>The EWGCOG TIP addresses Advanced Construction (AC) for Missouri and includes a schedule of projects using and the planned conversion of those projects/funds.</p> <p>This recommendation has <u>not yet</u> been implemented in connection with IDOT AC projects.</p>	Partially Implemented – Current ongoing collaborative work effort to show AC projects in the TIP.

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<p>Recommendation #11: Each State DOT 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.</p>	<p>MoDOT IDOT EWGCOG</p>	<p>The MoDOT and IDOT strive to provide EWGCOG each agency's project programming information as soon as project lists are developed. There has there has been no collaboratively developed and formalized written process, including a timeline, agreed to by the EWGCOG, MoDOT and IDOT.</p> <p>However, since the 2009 Certification review, MoDOT has made it a priority to coordinate the exchange of information with EWGCOG. MoDOT now attends quarterly Planning to Achieve Results (PAR) meetings with EWGCOG for project programming and increased their involvement in the Inter-Agency Consultation Group (IACG). Efforts have also been made through the IACG to streamline the planning process and benefit all agencies involved. The MoDOT has created policy of not adding projects to the EWGCOG TIP after the MoDOT program has been delivered for inclusion in the yearly TIP update. If projects need to be added after the initial delivery they will, in most cases, be added by amendment once the new TIP is active. This policy allows for exceptions in the case of special circumstances.</p>	<p>Partially Implemented. - On-going.</p>
<p>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.</p> <p>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.</p>	<p>EWGCOG</p>	<p>The EWGCOG is currently undertaking a significant effort related to performance measurements as part of the update of the Long Range Transportation Plan. As EWGCOG further develops and applies regional performance measures, more information can be collected, analyzed, and shared as part of the transportation planning process. The EWG intends to use this information to better understand how the existing system is operating and what effect future transportation investments will have on the overall regional network.</p>	<p>Implemented – Ongoing and continuous improvement work effort.</p>

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<i>2009 Final Report Recommendations</i>	<i>Responsible Agency</i>	<i>Activity/Action How it is being implemented</i>	<i>Current Status</i>
<p>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.</p>	EWGCOG	<p>The EWGCOG's effort to improve the Annual Listing of Obligated Projects development process has produced enhancements to the reporting document that help it to more clearly illustrate when, where, and how the Federal funding was spent/obligated. The EWGCOG's goal for the document is to convey the programmed and obligated project information in a user-friendly yet comprehensive manner for both highway and transit projects.</p>	Implemented.
<p>Recommendation #14: (Abbreviated) 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.</p> <p>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.</p>	EWGCOG	<p>The EWGCOG has been unable to gain support from key partners and stakeholders for the development of broadly accepted GHG reduction goals and strategies for the St. Louis region.</p> <p>EWGCOG has undertaken several steps to understand impacts of climate change on transportation, and to develop policy options for the region. Under the Regional Decision Support work element, an EWGCO staff member served as a lead author to the transportation chapter of the National Climate Assessment and contributed a chapter on transportation to a forthcoming book on climate change in the Midwest. The OneSTL planning effort identified additional impacts, as well as options that address both adaptation and GHG mitigation. EWGCOG staff have also collaborated with municipalities engaged in GHG inventories.</p> <p>In spite of the EWGCOG's limited legal authority to effectively integrate regional land use planning into local development decision making processes, the EWGCOG has facilitated a System of Plans work effort that has produced GIS files representing more than 65 future land use plans and zoning maps. GIS staff collected parcel files with assessor's land use codes from each county and merged them into a regional file with generalized land use descriptions.</p>	Partially Implemented. Ongoing work effort.
<p>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.</p>	EWGCOG	<p>At the time of the on-site segment, the EWGCOG had not completed the task of updating the PIP to incorporate goals and the description of explicit procedures, strategies, and desired outcomes for the ten listed areas called out in 23 CFR 450.316 (a).</p>	Not Implemented.
<p>Recommendation #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 and MoDOT sponsored).</p>	EWGCOG	<p>The EWGCOG updated their Title VI Plan in August 2011. The Title VI responsibilities of the MPO, the Title VI Complaint Procedure and reporting process is outlined in the updated Title VI Plan is: http://www.ewgateway.org/AboutUs/BusinessWithUs/TitleVIPlan-August2011.pdf</p>	Implemented.

**2009 Federal Certification Review of St. Louis Metropolitan Transportation Planning Process
April 13, 2009**

<i>2009 Final Report Recommendations</i>	<i>Responsible Agency</i>	<i>Activity/Action How it is being implemented</i>	<i>Current Status</i>
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.	EWGCOG	The EWGCOG is currently reviewing their process for substantiating the certification provisions. Efforts to enhance the process will be implemented as needed.	Not Implemented.

APPENDIX B

Review Team Public Meeting

With the passage of TEA-21 in 1998, public involvement became a required component of the TMA Certification Review process. The principal objective of this component is to provide the opportunity for the public to express their thoughts and comments about the transportation planning process and specifically how the process is meeting the needs of the area. In order to provide this opportunity for public engagement, a public meeting was held the evening of January 22, 2013 from 5:30 PM to 7:30 PM. at the East West Gateway Council of Governments, One Memorial Drive, Suite 1600 St. Louis, Missouri Library Center located at 4653 S. Campbell Avenue, St. Louis, Missouri. The meeting was advertised by a variety of methods including local newspapers, the EWGCOG's website, briefings to local governments, and direct mailings and e-mailings.

The public meeting included a brief presentation by the Certification Review Team and an open forum to receive public comments. The public meeting was attended by 10 local residents.

APPENDIX C

FY 2013 FHWA/FTA CERTIFICATION REVIEW ST. LOUIS METROPOLITAN AREA PLANNING PROCESS JANUARY 22-24, 2012

ON SITE REVIEW PLAN

TUESDAY, JANUARY 22, 2013

Afternoon (EWGCOG Offices):

1:00 – 1:30 pm – Introductions / Overview/Transportation Issues (FA Leader: Brad McMahon)

1:30 – 2:00 pm – Agreements & Contracts / MPO Administration (FA Leader: Betsy Tracy)

2:00 – 2:30 pm – EXECUTIVE ADVISORY COMMITTEE MEETING (Review Team Presentation)

2:30 – 3:00 pm - TMA Planning Area Boundaries/Urban Boundaries/Functional Classification (FA Leader: Mike Latuszek)

3:00– 4:30 pm – Transit Planning and Ridership (FA Team Leader: Mark Bechtel)

PUBLIC COMMENT SEGMENT

Start Time: 5:30 pm (EWGCOG Board Meeting Room)

End Time: 7:00 pm

WEDNESDAY, JANUARY 23, 2013

Morning (Hotel):

7:30 – 8:00 am. – “Kick Off” meeting (Hotel Breakfast Area Following Breakfast)

**** Meeting for the purpose of clarifying the review team member’s observations and findings resulting from the previous day’s roundtable session.**

Morning (EWGCOG Offices):

**8:30 – 10:30 am - Planning Program Process/Work Products (FA Team Leader: Brad McMahon)
(MTP/Tracy, UPWP/Bechtel, TIP/McMahon)**

10:30 – 10:45 am – Break

10:45 – 12:00 am – Continuation of Planning Program Process/Work Products (FA Team Leader: Brad McMahon)

12:00 – 1:00 pm – Lunch

Afternoon (EWGCOG Offices):

1:00 – 1:45 pm – Public Involvement (FA Leader: Betsy Tracy)

1:45 – 2:45 pm - Civil Rights/EJ (FA Team Leaders: Lauren Paulwell)

2:45 – 3:00 pm – Break

3:00 – 3:30 pm – ADA (FA Leader: Lauren Paulwell)

3:30 – 4:30 pm – Freight Planning (FA Leader: Brad McMahon)

THURSDAY, JANUARY 24, 2013

Morning:

7:30 - 8:00 am – Wrap Up and Move On Session (Review Team get together / Hotel breakfast Area)

Morning (EWGCOG Offices):

8:30 – 9:45 am – AQ & Conformity Determination Process (FA Leader: Brad McMahon)

9:45 – 10:30 am – Land Use /Livability (FA Leader: Mark Bechtel)

10:30 – 10:45 am – Break

10:45 – 12:00 am – Transportation Systems Management / CMP (FA Leader: Betsy Tracy)

12:00 – 1:00 pm – Lunch

Afternoon (EWGCOG Offices):

1:00 – 1:30 pm – Safety / Security Planning (FA Team Leader: Brad McMahon)

1:30 – 2:00 pm – Bicycle/Pedestrian Planning (FA Leader: Brad McMahon)

2:00 – 2:15 pm - Break

2:15 - 4:00 pm - Federal Review Team Meeting

4:00 – 5:00 pm - Closeout Meeting With EWGCOG Executive Director and Staff



U.S. Department of Transportation

Federal Transit Administration
901 Locust, Room 404
Kansas City, MO 64106
816-329-3920
816-329-3921 (fax)

Federal Highway Administration
3250 Executive Park
Springfield, IL 62703
217-492-4600
217-492-4621 (fax)

Federal Highway Administration
3220 W. Edgewood, Suite H
Jefferson City, Missouri 65109
573-637-7104
573-636-9283 (fax)

September 9, 2013

Mr. Ed Hillhouse
Executive Director
East West Gateway Council of Governments
One Memorial Drive, Suite 1600
St. Louis, MO 63102

Subject: St. Louis Metropolitan Area Planning Certification Review Final Report Corrective Action Implementation and Congestion Management Process (CMP)

Dear Mr. Hillhouse:

As requested in the East West Gateway Council of Governments (EWGCOG) July 31, 2013 letter, the Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) have reviewed the new Congestion Management Process (CMP) planning work product adopted by the EWGCOG's Board of Directors on July 31, 2013. On April 15, 2013 the FHWA and FTA completed a Federal Certification Review of the transportation planning process carried out in the St. Louis, MO-IL Transportation Management Area (TMA). The Certification Review Team, for the period April 13, 2013 to April 13, 2017, certified that the transportation planning process substantially meets the requirements as described in 23 CFR Part 450 and 49 CFR Part 613, subject to EWGCOG taking action on the identified corrective action that requires the EWGCOG to have a functioning Congestion Management Process (CMP) developed, established, and implemented as part of the metropolitan transportation planning process on or before September 30, 2013. The corrective action noted that the updated CMP must meet the requirements outlined in 23 CFR 450.320, including coordination with transportation system management and operations for activities.

Based on our review of the CMP adopted by the EWGCOG's Board of Directors, we are approving the planning work product as meeting the 23 CFR 450.320 requirements for a functioning CMP and satisfying the implementation requirements outlined in the Certification Review Team's corrective action.

The Certification Review Final Report noted significant improvements and many noteworthy practices in the East-West Gateway Council of Government's (EWGCOG's) planning process. We believe this reflects the results of cooperative efforts by State, local officials and EWGCOG staff to enhance the quality of the transportation planning process in the St. Louis metropolitan area. The EWGCOG's timely effort to produce the updated CMP is an ongoing reflection of its enhanced leadership role in the St. Louis region transportation planning process.

Thank you for allowing the FHWA and FTA to be participants in the CMP update process that was characterized by the spirit of cooperation with the goal of enhancing the quality of the transportation planning process.

If you should have any questions regarding our approval of the CMP and our recognition of the corrective action being implemented, please contact Brad McMahon of the FHWA Missouri Division at (573) 638- 2609, Betsy Tracy of the FHWA Illinois Division at (217) 492-4642, or Mark Bechtel of the FTA Region 7 Office at (816) 329-3937.

Sincerely,



Catherine Batey
IL Division Administrator
Federal Highway Administration



Kevin W. Ward, P.E.
MO Division Administrator
Federal Highway Administration



Mokhtee Ahmad
Regional Administrator
Federal Transit Administration

Enclosure

cc: Machelles Watkins, MoDOT
Mike Henderson, MoDOT
Greg Horn, MoDOT St. Louis District
Dick Smith, Office of Planning and Programming, IDOT
John Nations, METRO
Michael Jay, EPA Region VII

APPENDIX D

FY 2013 FHWA/FTA Certification Review St. Louis Metropolitan Area Transportation Planning Process East-West Gateway Council of Government Review Guideline Questions and Answers developed January 2013.

The guideline questions covering all focus areas were sent to EWGCOG five weeks prior to the start of the on-site segment of the review. The EWGCOG's response to guideline questions were reviewed by all team members and utilized as a resource for developing the framework for delivering the on-site segment of review. The Review Team commends the effort by the EWGCOG's staff to provide timely and thorough responses to the questions.

The full set of Review Guideline questions and answers and attachments referenced in the EWGCOG's responses, as well as a number of Council documents, can be accessed at:
<http://www.ewgateway.org/2013CRDocuments/>



U.S. Department of Transportation

Federal Transit Administration
901 Locust, Room 404
Kansas City, MO 64106
816-329-3920
816-329-3921 (fax)

Federal Highway Administration
3250 Executive Park
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Federal Highway Administration
3220 W. Edgewood, Suite H
Jefferson City, Missouri 65109
573-637-7104
573-636-9283 (fax)

April 15, 2013

Mr. Ed Hillhouse
Executive Director
East West Gateway Council of Governments
One Memorial Drive, Suite 1600
St. Louis, MO 63102

Subject: St. Louis Metropolitan Area Planning Certification Review Final Report

Dear Mr. Hillhouse:

Federal law 23 United States Code (U.S.C.) 134 (i)(5) and 49 U.S.C. 1607 require the transportation planning process for all Transportation Management Areas be jointly reviewed and certified by the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) at least once every four years. The objective of the certification review is to determine whether the transportation planning process can be certified as implementing the federal transportation planning requirements.

The certification review team consisted of staff from the FHWA Missouri and Illinois Division Offices and the FTA Region 7 Office. The review team's work effort consisted of both office and on-site reviews. The on-site portion of the review was conducted January 22-24, 2013. In addition to assessing the Metropolitan Planning Organization's (MPO's) progress in addressing findings from the 2009 Certification Review, the January site visit also focused on verifying the MPO's compliance with current transportation law, planning regulations, current issues, best practices, and planning process enhancement opportunities. The scope of the certification review was comprehensive, covering the transportation planning process for the entire area and all the agencies involved.

Enclosed is the final *MPO Certification Review Report* that documents the various components of the recent Certification Review of the St. Louis metropolitan planning process. The report provides an overview of the MPO certification process; summarizes the various discussions from the site visit; provides a series of review findings; and issues the FHWA/FTA certification action.

The Certification Review Team noted significant improvements and many noteworthy practices in the East-West Gateway Council of Government's (EWGCOG's) planning process. We believe this reflects the results of cooperative efforts by State, local officials and EWGCOG staff to enhance the quality of the transportation planning process in the St. Louis metropolitan area. The Certification Review Team identified one corrective action and a number of recommendations for the MPO to improve the current process.

Based on this review and ongoing oversight by the FHWA and FTA, the transportation planning process carried out in the St. Louis, MO-IL Transportation Management Area (TMA), for the period April 13, 2013 to April 13, 2017, is certified as substantially meeting the requirements as described in 23 CFR Part 450 and 49 CFR Part 613, subject to EWGCOG taking action on the identified corrective action that requires the EWGCOG to have a functioning Congestion Management Process (CMP) developed, established, and implemented as part of the metropolitan transportation planning process on or before September 30, 2013. The adopted CMP must meet the requirements outlined in 23 CFR 450.320, including coordination with transportation system management and operations for activities. The MPO's progress in addressing this corrective action will be monitored by the Review Team. If the MPO has not satisfied this corrective action by September 30, 2013, restrictions on updating or amending the TIP will be imposed. This restriction will not allow Federal funds to be programmed for any project that will result in a significant increase in the carrying capacity for single occupancy vehicles (i.e., a new general purpose highway on a new location or adding general purpose lanes, with the exception of safety improvements or the elimination of bottlenecks).

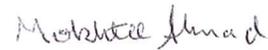
Our offices are available to meet with EWGCOG staff to discuss and clarify the certification review's findings. Please provide a response within 60 days of receipt of this report describing how you plan to address the corrective action and the recommendations. This report has been transmitted concurrently to the Missouri Department of Transportation (MoDOT), Illinois DOT (IDOT) and METRO.

The certification review was done in the spirit of cooperation with the goal of enhancing the quality of the transportation planning process. We would like to thank you and your staff for their time and assistance during the review process.

If you should have any questions regarding the certification review process and/or the certification review Final Report, please contact Brad McMahon of the FHWA Missouri Division at (573) 638-2609, Betsy Tracy of the FHWA Illinois Division at (217) 492-4642, or Mark Bechtel of the FTA Region 7 Office at (816) 329-3937.



Sincerely,



Glenn Fulkerson
Acting IL Division Administrator
Federal Highway Administration

Kevin Ward, P.E.
MO Division Administrator
Federal Highway Administration

Mokhtee Ahmad
Regional Administrator
Federal Transit Administration

Enclosure

cc: Mabelle Watkins, MoDOT w/enc.
Ed Hassinger, MoDOT St. Louis District w/enc.
Dick Smith, Office of Planning and Programming, IDOT w/enc.
METRO w/enc.
Michael Jay, EPA Region VII w/enc.