



U.S. Department  
of Transportation

Federal Highway  
Administration

Federal Transit  
Administration

# Transportation Management Area Planning Certification Review

## St. Louis Transportation Management Area



**April 14, 2017**

**Summary Report**

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## 1.0 EXECUTIVE SUMMARY

On January 24-26, 2017, the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) conducted the certification review of the transportation planning process for the St. Louis urbanized area. FHWA and FTA are required to jointly review and evaluate the transportation planning process for each urbanized area over 200,000 in population at least every four years to determine if the process meets the Federal planning requirements.

The East West Gateway Council of Governments (EWGCOG) is the designated Metropolitan Planning Organization for the St. Louis region and works with the Missouri Department of Transportation (MoDOT) and Illinois Department of Transportation (IDOT) as well as the region's public transit operators to implement the federally required planning process.

The scope of the federal certification review of the St Louis metropolitan planning process was comprehensive, covering the transportation planning process for the entire area and all the agencies involved. The federal review team's work consisted of reviewing the products of the planning process, reviewing the ongoing oversight activities conducted by the FHWA and the FTA, and an on-site review conducted January 24-26, 2017 at EWGCOG offices where discussions were held with the members of the transportation planning process. In addition to assessing the progress in addressing recommendations from the last certification review in 2013, the on-site review focused on compliance with current transportation law, planning regulations, current issues, best practices, and opportunities to enhance the planning process.

This final report summarizes the current status of planning areas, provides an overview of review findings and highlights noteworthy practices at EWGCOG. Additionally, a number of recommendations have been made for the EWGCOG to improve the current transportation planning process. A detailed summary of commendations and recommendations is covered 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, Missouri Transportation Management Area *for the period April 16, 2017 to April 15, 2021* is certified as meeting the requirements as described in 23 CFR Part 450 and 49 CFR Part 613.

## **1.1 Disposition of FY 2013 Certification Review Corrective Action and Recommendations**

The 2013 Federal Certification Review Final Report dated April 15, 2013 presented one corrective action and 16 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 disposition summary table that can be viewed in Appendix B. Fifteen of the 16 recommendations have been fully or partially implemented. The disposition of the 2013 corrective action is shown below.

**FY 2013 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 adopted CMP must meet the requirements outlined in 23 CFR 450.320, including coordination with transportation system management and operations for activities.

**Disposition of the FY 2013 Corrective Action:** The updated CMP adopted by the EWGCOG's Board of Directors on July 31, 2013 was approved by ONE DOT on August 9, 2013 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 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.

## **1.2 Summary of FY 2017 Findings**

The FY 2017 certification review found that the metropolitan transportation planning process conducted in the St. Louis urbanized area meets Federal planning requirements. As a result of this review, FHWA and FTA are certifying the transportation planning process conducted by Missouri/Illinois Department of Transportation (MoDOT, IDOT), East-West Council of Governments Metropolitan Planning Organization (EWGCOG) and Bi-State- Metro (public transit provider). This report will address recommendations that warrant consideration, as well as commendations in areas that EWGCOG is highly performing

### **Key Definitions:**

**Corrective Actions:** Those items are compliance issues that fail to meet one or more requirements of the federal planning statute and regulations.

**Recommendations:** Items that address technical improvements to processes or procedures, that are not regulatory, but are still significant enough that FHWA and FTA encourage taking

some action. Typically, the recommendations involve the state of the practice instead of federal regulatory requirements.

**Commendations - Noteworthy Practices:** Elements that demonstrate well thought out procedure for implementing the planning requirements. Elements that address items that have been difficult nationwide could be cited as noteworthy practice. FHWA and FTA may wish to offer commendations for significant improvements and/or resolution of past finding.

**List of 2017 Certification Review Recommendations:**

Review Area	Finding	Recommendations
MPA and Functional Classification, Consultation and Coordination 23 U.S.C. 134(g) & (i) 23 CFR 450.316, 23 CFR 450.324(g)	Recommendation	<ol style="list-style-type: none"> <li>1. The EWGCOG include the Board of Directors and Governor approval dates on the current MPA map and making the enhanced map available for viewing on the EWGCOG website</li> <li>2. The EWGCOG and MoDOT modify the current cooperative functional reclassification process in a manner that allows for earlier involvement of the MoDOT Central Office and the FHWA Missouri Division</li> </ol>
MPO Structure and Agreements 23 U.S.C. 134(d) 23 CFR 450.314(a)	Recommendation	<ol style="list-style-type: none"> <li>3. Review current agreements (MOU/MOA's) for the FAST ACT, Performance Measures compliance and coordination in developing the Annual Listing of Obligated Projects (ALOP) and establish periodic review of these agreements</li> </ol>
Unified Planning Work Program 23 CFR 450.308	Recommendation	<ol style="list-style-type: none"> <li>4. Recommend member jurisdictions have more input on UPWP development and planning studies. FHWA and FTA recommend the EWGCOG have a process that allows more local transportation studies to be considered for programming into the UPWP</li> </ol>
Metropolitan Transportation Plan 23 U.S.C. 134(c),(h)&(i) 23 CFR 450.324	Recommendation	<ol style="list-style-type: none"> <li>5. EWGCOG should develop a more robust multimodal program of projects for the long range MTP and include an education component for member jurisdictions</li> <li>6. When concurrently updating the TIP and MTP EWGCOG should update the project list in the MTP</li> <li>7. The EWGCOG educate LPA's about the necessary steps for documenting the demonstration of fiscal constraint required for locally sponsored regionally significant projects, including those from non-Federal funding sources that should be included in the EWGCOG's LRTP.</li> </ol>

<p>Transportation Improvement Program 23 U.S.C. 134(c)(h) &amp; (j) 23 CFR 450.326</p>	<p>Recommendation</p>	<p>8. The IDOT work together with the EWGCOG to formulate and implement an enhanced collaboration and coordination process that ensures the EWGCOG’s involvement in the IDOT’s development and selection of projects located within the MPA for inclusion in the IDOT’s STIP</p> <p>9. At the time of the next TIP update, the EWGCOG take steps to complete the following work efforts to enhance the clarity of the documented demonstration of fiscal constraint:</p> <ul style="list-style-type: none"> <li>• Rename the “Transportation Programs Sub-allocated to St. Louis Metro Sub-allocated Federal Funding Table” presented in the current EWG TIP (Pg. 39), to clarify its application and modify to separately show the carryover balance (previously allocated but not programmed) amount available for programming at the start of FY2018. This amount plus the estimated annual allotment should be clearly shown as available for programming projects in FY2018</li> <li>• Show the total anticipated federal revenue in the revenue line item in the Financial Capacity by Funding Category –FHWA (in thousands)-Missouri Table (Pg. 40)</li> <li>• Modifying the Financial Capacity by Funding Category – FHWA (in thousands)-Missouri Table (Pg. 40) to only show the anticipated MoDOT funding as MoDOT (Federal) and MoDOT (State) as an alternative to the various federal and state categories</li> <li>• Modify the Budgeted Local Revenue versus Budgeted Outlays Table (F-3 to F-8) in the manner that calculates an LPA’s financial capacity for funding new TIP commitments that are processed in TIP modification actions completed throughout the program year</li> <li>• Modify the “Budgeted Local Revenue versus Budgeted Outlays” table (F-3 to F-8), to show LPA total O&amp;M cost for locally owned federal-aid system lane miles</li> </ul> <p>10. The EWGCOG and local transit agencies work together to implement the following practices when documenting the demonstration of fiscal constraint in connection with programmed transit projects:</p> <ul style="list-style-type: none"> <li>• Show all anticipated federal revenue for each TIP horizon year, which is available for funding transit projects, regardless of the amount of programmed funding for each horizon year</li> </ul>
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		<ul style="list-style-type: none"> <li>• The programming of all federal revenue that is shown as being available to fund transit in each year of the TIP horizon period</li> </ul> <p>11. The EWGCOG take steps to educate the LPA project sponsors regarding the O&amp;M cost estimates as part of their LPA workshops delivered in connection with the next TIP update cycle.</p> <p>12. The EWGOG’s take the following steps to enhance the effectiveness of their TIP modification policy:</p> <ul style="list-style-type: none"> <li>• The EWGCOG and MoDOT work together to develop and implement a TIP modification process that ensures that the EWG is made aware of the description of added scope and added cost to LPA projects and when there is added cost for federally participating work currently described in the TIP.</li> <li>• Update the TIP modification policy to include major scope changes to LPA sponsored federal-aid projects in the amendment action that currently calls out the same for SDOT &amp; transit sponsored projects.</li> <li>• Update the TIP modification policy to include the changing of funding sources (i.e. federal to state, state to federal) as an amendment action.</li> <li>• Modify their TIP modification policy to call for providing the supplemental documentation developed in connection with a completed administrative modification action to be provided to the EWGCOG Policy Board for information purposes.</li> </ul> <p>13. The FHWA Missouri Division and MoDOT, partner together to help the EWGCOG obtain Category 2 (read only access) access to the Fiscal Management Information System 5.0 (FMIS5-P).</p> <p>14. The FHWA Missouri Division and MoDOT deliver training to the EWGCOG staff in how to maximize the value and efficiency of their Category 2 (read only access) access experience.</p>
Public Participation 23 U.S.C. 134(i)(6) 23 CFR 450.316 & 450.326(b)	Recommendation	15. Recommend EWGCOG evaluate and document the outcome of public outreach participation activities

Civil Rights Title VI Civil Rights Act, 23 U.S.C. 324, Age Discrimination Act, Sec. 504 Rehabilitation Act, Americans with Disabilities Act	Recommendation	16. EWGCOG should work with MoDOT to increase outreach and education to the LPA's on the importance of ADA Transition Plans. Additionally, project applications and plans should be reviewed to ensure that ADA requirements are included in cost estimates.
Freight 23 U.S.C. 134(h) 23 CFR 450.306	Recommendation	17. FHWA, MoDOT, IDOT and EWGCOG work together to seek future freight training opportunities to support and to integrate the consideration of freight movement into the St. Louis metropolitan transportation planning process.
Air Quality Clean Air Act 42 U.S.C. 7401 40 CFR Part 93 23 CFR 450.324(m)	Recommendation	18. The EWGCOG and IDOT coordinate to provide the resources necessary to replace antiquated ITS equipment and ATMS software and to properly train District personnel in order to bring the system up to current standards using the latest technology.
Congestion Management Process / Management and Operations 23 U.S.C. 134(k)(3) 23 CFR 450.322	Recommendation	19. Continue to work with IDOT in building and maintaining an Intelligent Transportation System (ITS) regional architecture

### List of 2017 Certification Review Commendations:

Review Area	Commendation
Metropolitan Transportation Plan 23 U.S.C. 134(c),(h)&(i)  23 CFR 450.324	<ol style="list-style-type: none"> <li>1. The MoDOT is commended for their leadership role in the start-up and delivering of monthly webinars to discuss the status of rulemaking and the implementation of FAST Act performance measures, including target setting</li> <li>2. The EWGCOG and SDOTs are commended for their overall partnering effort to effectively deliver the development and implementation of FAST Act performance measures, including target setting into the St. Louis metropolitan planning area transportation planning process</li> </ol>
Transit Planning 49 U.S.C. 5303 23 U.S.C. 134  23 CFR 450.314	<ol style="list-style-type: none"> <li>3. Madison County Transit (MCT) is commended in implementing innovative strategies to meet the challenge of providing improved transit access to jobs that located in Gateway Commerce Center (GCC), a low transit access area</li> </ol>
Transportation Improvement Program 23 U.S.C. 134(c)(h) & (j)	<ol style="list-style-type: none"> <li>4. The EWGCOG is commended on their outreach work effort delivered as part of the TIP project development and selection process, that includes the TIP Frequently</li> </ol>

23 CFR 450.326	Asked Questions (FAQ) section that communicates how community resources are allocated within the region to LPA project sponsors and the general public
Freight 23 U.S.C. 134(h)  23 CFR 450.306	<ol style="list-style-type: none"> <li>5. The EWGCOG is commended for their ongoing effort to champion the integration of freight movement into the overall St. Louis metropolitan planning process, including the project prioritization and selection for programming</li> <li>6. The EWGCOG, MoDOT and the St. Louis Regional Freightway are commended for their efforts to formulate the St. Louis regional element of the Missouri Statewide Freight Advisory Committee framework</li> </ol>
Integration of Land Use and Transportation 23 U.S.C. 134(g)(3) 23 U.S.C. 134(h)(1)(E) 23 CFR 450.306(a)(5)	7. The EWGCOG's ongoing effort to engage agencies early in the planning process as resulted in reduced or avoided impacts to key ecological priorities while advancing the transportation program goals
Congestion Management Process / Management and Operations 23 U.S.C. 134(k)(3)  23 CFR 450.322	8. The EWGCOG is commended for developing a functioning CMP and utilizing the Congestion Management Operations Committee (CMOC) and Technical Action Committee (TAC) to share information, providing assistance for member agencies and encouraging ITS investment in the region

## 2.0 INTRODUCTION

### 2.1 Background

Pursuant to 23 U.S.C. 134(k) and 49 U.S.C. 5303(k), the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) must jointly certify the metropolitan transportation planning process in Transportation Management Areas (TMAs) at least every four years. A TMA is an urbanized area, as defined by the U.S. Census Bureau, with a population of over 200,000. In general, the reviews consist of three primary activities: a site visit, a review of planning products (in advance of and during the site visit), and preparation of a Certification Review Report that summarizes the review and provides findings. The reviews focus on compliance with Federal regulations, challenges, successes, and experiences of the cooperative relationship between the MPO's, the State DOT's, and public transportation operator(s) in the conduct of the metropolitan transportation planning process. Joint FTA/FHWA Certification Review guidelines provide agency field reviewers with latitude and flexibility to tailor the review to reflect regional issues and needs. Consequently, the scope and depth of the Certification Review reports vary significantly.

The Certification Review process is only one of several methods used to assess the quality of a regional metropolitan transportation 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.

While the Certification Review report itself may not fully document the many intermediate and ongoing checkpoints, the findings of Certification Review are based upon the cumulative findings of the entire review effort.

The content of this report and particularly the current status narratives include information from on-site discussions and EWGCOG staff responses to the certification review team's guideline questions that were submitted to the MPO and were completed prior to the onsite review.

## **2.2 Purpose and Objective**

Since the enactment of the Intermodal Surface Transportation Efficiency Act (ISTEA) of 1991, the FHWA and FTA, are required to jointly review and evaluate the transportation planning process in all urbanized areas over 200,000 in population to determine if the process meets the Federal planning requirements in 23 U.S.C. 134, 40 U.S.C. 5303, and 23 CFR 450. The Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU) extended the minimum allowable frequency of certification reviews to once at least every four years.

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.

The EWGCOG is the designated MPO for the St. Louis urbanized area. Both MODOT and IDOT are the responsible State agencies and Bi-State Metro, Madison County Transit and St. Clair County Transit are the responsible public transportation operators. Current membership of the EWGCOG

MPO consists of elected officials and citizens from political jurisdictions in the St. Louis urbanized area. The metropolitan planning area includes all of St. Louis urbanized area with the City of St. Louis as the largest population center.

Certification of the planning process is a prerequisite to the approval of Federal funding for transportation projects in such areas. The certification review is also an opportunity to provide assistance on new programs and to enhance the ability of the metropolitan transportation planning process to provide decision makers with the knowledge they need to make well-informed capital and operating investment decisions.

**Federal Review Team Members:**

Jeremiah Shuler, Community Planner, FTA Region VII

Betsy Tracy, *Transportation Planning Specialist*, FHWA Illinois

Mark Bechtel, Director of Planning and Program Development, FTA Region VII

Enos Han- FHWA, Community Planner, Missouri

Bradley McMahon, *Transportation Specialist*, FHWA Missouri

Lauren Paulwell, FHWA Missouri Civil Rights Program Officer

### **3.0 SCOPE AND METHODOLOGY**

#### **3.1 Review Process**

The previous certification review was conducted in FY 2013. A summary of the status of findings from that review is provided in Appendix B. This report details the current review, which consisted of a formal site visit and a public hearing opportunity, conducted January 24-26, 2017 at EWGCOG offices. The public hearing was held on January 24, 2017.

Participants in the review included representatives of FHWA-MO/IL, FTA- Region VII and HQ office, MODOT, IDOT, Bi-State Metro, Madison County Transit, St Clair County Transit and EWGCOG MPO staff among others. A full list of participants is included in Appendix A.

A desk audit of current documents and correspondence was completed prior to the site visit. In addition to the formal review, routine oversight mechanisms provide a major source of information upon which to base the certification findings. Additionally, review guideline questions, in the form of a list of questions that reflect current federal regulations, were provided to the MPO. The MPO staff and planning partners provided very detailed and informative responses to the Federal Team’s questionnaire prior to the Certification Review.

The certification review covers the transportation planning process conducted cooperatively by the MPO, State, and public transportation operators. Background information, current status, key findings, and recommendations are summarized in the body of the report.

## **3.2 Documents Reviewed**

The following MPO documents were evaluated as part of this planning process review:

- MPO By-Laws Agreement, 2005
- FY 2017 Unified Planning Work Program for the EWGCOG MPO
- EWGCGOG MTP, Connected 2045
- EWGCOG FY-2017-2020 TIP and Self-Certification
- America's Gateway –Strategic Action Plan for the St. Louis Regional Freight Partnership 2014
- MOU Between EWGCOG and the Missouri Highways and Transportation Commission 2004
- MOU between the EWGCOG and the St. Louis area public transit providers 2007
- 2016 Report to the Region-Measuring Our Progress 2016
- Where We Stand- The Strategic Assessment of the St. Louis Region 7<sup>th</sup> Edition
- Community Connections- Public Participation Plan 2014
- EWGCOG Title VI Plan
- CHSTP-Coordinated Human Services Transportation Plan 2014

## **3.3 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, MPO's, and transit operators are required to provide for opportunities 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 MPO certification review process.

A public meeting was conducted as part of the Certification Review on the evening of January 24, 2017 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 Board of Directors (BOD) as part of their regularly scheduled January 24, 2017 meeting. The presentation included a power point overview of the Certification Review process and an invitation to the Board member to provide input for 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

## 4.0 PROGRAM REVIEW

### 4.1 Metropolitan Planning Area Boundaries and Functional Classification

*Metropolitan Planning Area Boundaries:*

#### 4.1.1 Regulatory Basis

23 U.S.C. 134(e) and 23 CFR 450.312(a) state the boundaries of a Metropolitan Planning Area (MPA) shall be determined by agreement between the MPO and the Governor. At a minimum, the MPA boundaries shall encompass the entire existing urbanized area (as defined by the Bureau of the Census) plus the contiguous area expected to become urbanized within a 20-year forecast period for the MTP.

**4.1.2 Current Status:** The designated Metropolitan Planning Organization for the St. Louis Urbanized is East-West Gateway Council of Governments (EWGCOG).

The EWGCOG, in cooperation with the with the SDOTs and public transportation operators, review the MPA boundaries after each Census to determine if existing boundaries meet the minimum statutory requirements for new and updated urbanized area(s). The cooperative process for modifying the MPA is very similar to the process for changes in functional reclassification. When a modification of the MPA is considered, the EWGCOG and SDOT staffs meet to discuss the modification and review for relevance and consistency with all state and federal guidelines/regulations. After making an initial recommendation, the EWGCOG and SDOT staff(s) would meet, if needed, to discuss and resolve any issue(s) and formulate a cooperative final recommendation. The recommendation is then sent to the TPCs, EAC, and Board of Directors for approval.

In July 2014 the EWGCOG Board of Directors approved the modification of the MPA to account for the Urbanized Area (UZA), located in Illinois (Jersey County), that was added by the 2010 Census.

A copy of the MPA map is not currently made available for viewing on the EWGCOG's website. A copy of the MPA map is included in the appendix section of the 2017 UPWP. This map does not show the Board and Governor approval dates.

In order to take advantage of widely available and more robust demographic and economic data, EWGCOG has opted to define the geographic boundaries of its MPA at the county level. The MPO Planning Area boundaries include the Missouri counties of St. Louis, St. Charles, Franklin and Jefferson and the city of St. Louis. In Illinois, the MPO boundaries include Madison, St. Clair and Monroe Counties.

As of 2015, the U.S. Census population estimates 2,150,706 people reside in the St. Louis urbanized area and 2,806,207 people live in the 15 county St. Louis Metropolitan Statistical Area.

#### **4.1.3 Finding:**

**Recommendation 1:** The EWGCOG consider including the Board and Governor approval dates on the current MPA map and making the map available for viewing on the EWGCOG website

#### *Functional Classification:*

The EWGCOG is responsible, in cooperation with the MODOT and IDOT, for maintaining the functional classification system in the St. Louis metropolitan region. EWG has developed a local Functional Classification Procedures Manual that outlines the concepts, definitions, and characteristics of the functional classification system in the region and procedures followed to periodically review and revise the functional classification system. This procedures manual conforms to FHWA directives regarding the functional classification of roadway systems. The manual can be viewed at: <http://www.ewgateway.org/trans/funcclass/ProcedureManual-2016.pdf>

During the onsite session the review team discussed with MoDOT and EWGCOG staff the potential value of involving the MoDOT Central Office and the FHWA in the functional classification process at a point sometime before the system revisions are presented to the EWGCOG Board of Directors (i.e. after TPC review and before presentation to the EAC). The consensus of the group is that this type of process modification could add value to the effectiveness and efficiency to the process.

#### **4.1.4 Finding:**

#### **Recommendation 2:**

The EWGCOG and MoDOT consider modifying the current functional classification revision process in a manner that allows for earlier involvement of the MoDOT Central Office and the FHWA Missouri Division.

## **4.2 MPO Structure and Agreements**

### **4.2.1 Regulatory Basis**

23 U.S.C. 134(d) and 23 CFR 450.314(a) state the MPO, the State, and the public transportation operator shall cooperatively determine their mutual responsibilities in carrying out the metropolitan transportation planning process. These responsibilities shall be clearly identified in written agreements among the MPO, the State, and the public transportation operator.

**4.2.2 Current Status:** The EWGCOG was established in 1965 by the Governors of Missouri and Illinois. Their by-laws lay out the membership of the Board of Directors and establish committee structure. The Board of Directors is comprised of 24 voting members and 5 non-voting members who represent agencies and governments from throughout eight counties in Missouri and Illinois. This area includes five counties (including the City of St. Louis) in Missouri, and three counties in Illinois.

In 2014, EWGCOG applied for a waiver regarding the MAP-21 requirement that mandates transit representation on the Board of Director policy committee. This waiver request was received and approved by the FTA- Region VII office. The revised MPA was approved by the Illinois governor on September 11, 2014.

EWGCOG has a 2004 Memorandum of Understanding (MOU) with the Missouri Highways and Transportation Commission and a 2007 Illinois MPO Cooperative agreement with the area transit providers to coordinate and cooperate in the federally mandated planning process.

The Transportation Planning Committee consists of transportation oriented staff members appointed by the Board representing local jurisdictions. In addition, members of all implementing agencies are represented as well as other modal and resource interests.

The Air Quality Advisory Committee is appointed by the Board and consists of members of the federal and state resource agencies, transportation agencies and environmental interests. This committee considers matters concerning the relationship between air quality and transportation.

The Paratransit Advisory Committee includes individuals in the region who are knowledgeable about the transportation needs of the elderly, the disabled and others with special needs.

The Transportation Safety Advisory Committee considers matters concerning the state of the region's roadways as they relate to safety and methods to improve safety.

Major Transit Operators in the MPA include Bi-State Metro, Madison County Transit and St. Clair County Transit.

EWGCOG's current membership and voting arrangement is consistent with federal requirements

**Finding:**

**Recommendation 3:** Review current agreements (MOU/MOA's) for the FAST ACT, Performance Measures compliance and coordination in developing the Annual Listing of Obligated Projects (ALOP) and establish periodic review of these agreements.

## 4.3 Unified Planning Work Program

### 4.3.1 Regulatory Basis

23 CFR 450.308 sets the requirement that planning activities performed under Titles 23 and 49 U.S.C. be documented in a Unified Planning Work Program (UPWP). The MPO, in cooperation with the State and public transportation operators, shall develop a UPWP that includes a discussion of the planning priorities facing the MPA and the work proposed for the next one- or two-year period by major activity and task in sufficient detail to indicate the agency that will perform the work, the schedule for completing the work, the resulting products, the proposed funding, and sources of funds.

**4.3.2 Current Status:** EWGCOG is currently operating under planning agreements for their UPWP for FY 2017 (July 1, 2016 - June 30, 2017). The Council's staff directors convene in early January every year to discuss the work requirements for the upcoming fiscal year.

The Missouri budget of the FY 2017 UPWP is \$4,436,670 (\$3,755,485-CPG, \$681,185-local match) The Illinois Budget is \$1,036,320- federal funds and \$259,080 local match.

The UPWP appears to be in keeping with the 10 guiding principles and established goals of the Connected 2045 MTP and defines planning activities that generally support locally defined goals.

### 4.3.3 Findings:

**Recommendation 4:** Recommend that MPO members have more input on UPWP development and potential transportation studies as funding allows. It is recommended that EWGCOG have a process that allows more local transportation studies to be considered and funded through the annual work program.

## 4.4 Metropolitan Transportation Plan

### 4.4.1 Regulatory Basis

23 U.S.C. 134(c), (h) & (i) and 23 CFR 450.324 set forth requirements for the development and content of the Metropolitan Transportation Plan (MTP). Among the requirements are that the MTP address at least a 20 year planning horizon and that it includes both long and short range strategies that lead to the development of an integrated and multi-modal system to facilitate the safe and efficient movement of people and goods in addressing current and future transportation demand.

The MTP is required to provide a continuing, cooperative, and comprehensive multimodal transportation planning process. The plan needs to consider all applicable issues related to the

transportation systems development, land use, employment, economic development, natural environment, and housing and community development.

23 CFR 450.324(c) requires the MPO to review and update the MTP at least every four years in air quality nonattainment and maintenance areas and reflect current and forecasted transportation, population, land use, employment, congestion, and economic conditions and trends.

**4.4.2 Current Status:** EWGCOG's current MTP is Connected 2045, it was approved by the BOD on June 24, 2015. Connected 2045 consist of two publications. First, is a summary text that succinctly communicates regional challenges and offers a multimodal performance management desired outcome dashboard. The second document of Connected 2045 is the State of the System Report that includes a more technical and in-depth examination of the regions assets, demographics, economic trends, congestion and regional mobility challenges.

In 2014, as part of the public participation engagement component of the plan, EWGCOG facilitated a four-part speaker series, conducted several technical workshops during the MTP update process. The speaker series included a look at St Louis' transportation past, freight and logistics, equity issues and environmental justice concerns and preservation of the system.

Additionally, a regional representative technical stakeholder group met regularly throughout the plan development process. This group helped to guide deliberations and provide input into what performance measures were selected for *Connected2045*, as well as to discuss the weighting of those measures for various project types. The technical stakeholder group included members from the following sectors: paratransit, the disability and elderly community, economic development and freight (both private and public sector), government (municipal, county, state, and federal), new and long-term immigrant communities, low-income citizens, the environment, bicyclists, pedestrians, transportation safety specialists, roads, train, air and public transit representatives from Illinois and Missouri.

The EWGCOG is delivering a continuing, cooperative, and comprehensive multimodal transportation planning process and has developed the Connected 2045 long range transportation plan that includes long and short range strategies that lead to the development of an integrated and multi-modal system that are facilitating the safe and efficient movement of people and goods in addressing current and future transportation demand.

The EWGCOG next Metropolitan Transportation Plan update is due in June 2019.

#### **4.4.3 Findings:**

**Recommendation 5:** EWGCOG should develop a more robust multimodal program of projects for the MTP and include an education component for member jurisdictions. The EWGCOG should forecast anticipated annual ridership for the transit system for the life of the plan.

**Recommendation 6:** When concurrently updating the TIP and MTP EWGCOG should update the project list in the MTP.

*Development of Performance Measures, Targets and Strategies:*

Under MAP-21, MPO's were required to establish a performance and outcome-based program to ensure that investments in transportation will make progress toward achieving national goals. Connected2045's Performance Management Framework shows how EWG's 10 Guiding Principles align with federal goal areas. The Framework also establishes a set of system-level and project level performance measures that are tied to the 10 Guiding Principles and will allow the EWGCOG to evaluate individual transportation projects and the system as a whole in a way that prioritizes federal, state and regional goals.

The EWGCOG continues to monitor the gradual rollout of Federal performance measures.

The MoDOT initiated monthly MAP-21 performance management webinars in March 2015. Participants in the current FAST ACT/MAP-21 monthly webinars include the Missouri MPOs, SDOT representatives from the States that share MPOs with Missouri, FHWA and FTA. EWGCOG staff participate in the monthly webinars to discuss the status of federal rulemaking and the implementation of FAST Act performance measures, including target setting. The MoDOT produces an Excel spreadsheet that includes the details of ongoing rulemaking, timing, agency responsibilities, data, etc. The EWGCOG anticipates meeting all deadlines related to performance measures for MPOs. Additionally, the EWGCOG's staff has had in-person meetings with MoDOT and attended workshops about target setting. Staff have also participated in an Illinois state safety target setting coordination workshop in Springfield hosted by IDOT.

The EWGCOG has maintained ongoing involvement with State and Federal agencies to be able to meet all deadlines related to performance measures for MPOs for the purpose of ensuring that investments in St. Louis region transportation system will make progress toward achieving national goals.

**Commendation 1:** The MoDOT is commended for their leadership role in the start-up and delivering of monthly webinars to discuss the status of rulemaking and the implementation of FAST Act performance measures, including the future target setting requirements.

**Commendation 2:** The EWGCOG and SDOT's are commended for their overall partnering effort to effectively deliver the development and implementation of FAST Act performance measures, including working towards target setting as part of the St. Louis metropolitan planning area transportation planning process.

*Local Public Agency Regionally Significant Projects*

**Current Status:** At the time of the 2013 certification review the EWGCOG LRTP did not include any LPA regionally significant projects in either the fiscally constrained element of the plan. The

2013 certification review recommended that EWGCOG’s RTP development process include the formalized solicitation and inclusion of regionally significant projects from local public agencies. The EWGCOG solicited for locally sponsored regionally significant projects as part of the development of the Connected2045 LRTP. The solicitation advised local agencies of the requirement for the project proposal to include a reasonable financial plan. Only one local sponsor responded, but the sponsor could not specify how the project would be financed.

**Finding 4.4.4** There is currently only one LPA regionally significant project presented in the FY2020 to FY2045 horizon period. There are currently multiple LPA’s developing their environmental determinations for regionally significant projects that they plan to implement within the Connected2045 LRTP horizon period. These projects will be required to be shown in the fiscally constrained element of the Connected2045 LRTP as a condition for FHWA Missouri Division approving the completed environmental determination.

The 2013 certification review recommendation also promoted the EWGCOG’s inclusion of an illustrative projects listing of LPA sponsored regionally significant projects and LPA corridor studies in the next updated RTP. The EWGCOG Connected2045 LRTP continued the practice of including SDOT and transit agency sponsored projects in an “illustrative” status. These projects can be drawn into the fiscal constrained (priority) element of the LRTP if additional revenues become available. The EWGCOG elected to not include LPA sponsored projects in the “illustrative” status on the basis that LPA illustrative projects have a much less likelihood, than SDOT and transit agency projects, for the infusion of additional funding.

**Recommendation 7:** The EWGCOG educate LPA’s about the necessary steps for documenting the demonstration of fiscal constraint required for locally sponsored regionally significant projects, including those from non-Federal funding sources that should be included in the EWGCOG’s LRTP.

The EWGCOG should include proposed LPA sponsored projects that do not meet the demonstration of fiscal constraint requirements for inclusion in the fiscally constrained element of the MTP, to be included in the “Illustrative” element of the MTP.

## **4.5 Transit Planning**

### **4.5.1 Regulatory Basis**

49 U.S.C. 5303 and 23 U.S.C. 134 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.

**4.5.2 Current Status:** Transit planning in the St. Louis region is predominantly conducted by the three large transit operators, particularly in the areas of route design, amenities and

frequency. Area transit operators additionally provide EWGCOG with financial information and a program of capital projects for the development of the area's TIP.

The St. Louis area transit providers and EWGCOG coordinate planning activities on a variety of levels, from data sharing to participating in the development of regional plans. During the development of Metro's long-range plan, area transit agencies worked together to provide input. Additionally, Metro, MoDOT, and the Council coordinate on corridor studies through the Transportation Corridor Improvement Group (TCIG). As part of this group, the TCIG recently collaborated on the following:

- 1) Rapid Transit Connector Study
- 2) I-270 Corridor study
- 3) Northside-Southside Metro Link Conceptual Design study

Close cooperation between the agencies also occurs in paratransit planning and programming, with the Council taking the lead in preparing the Coordinated Human Services Transportation Plan. Metro is responsible for administration of the Section 5310 New Freedom-type projects for the Council. The two agencies have also collaborated in planning for transit-oriented development at Metro Link stations.

Metro's transit service plan, which governs its bus and light rail system is continuously evolving, and is shaped by three primary planning phases: 1) the *Moving Transit Forward* long-range plan, 2) a mid-range strategic plan, and 3) quarterly service changes. Each of these plan phases is designed to provide efficient transit service that meets the evolving mobility needs of the St. Louis region.

*Moving Transit Forward* was adopted by the Boards of Bi-State Development and EWGCOG in 2010. This plan included extensive public participation and involvement in developing this common vision, which was designed to meet regional transit needs over a next thirty-year period.

Since its adoption, Metro and its partners moved from planning to implementation and have completed projects intended to expand and transit service including the opening of a new Metro Bus hub, the North County Transit Center, in March 2016, and the strategic realignment of bus service in surrounding markets. Metro is currently designing an infill light rail station, the Boyle Metro Link Station, which is scheduled to open in 2018. In 2013, Metro and its partners including East-West Gateway Council of Governments, MoDOT, the City of St. Louis and St. Louis County completed the *Rapid Transit Connector Study*, which recommended implementation of two bus rapid transit (BRT) corridors. These projects have been included as illustrative plans in the region's long-range plan, as the region pursues funding for final planning and design. These regional partners are also engaged in conceptual design studies, which will help regional leadership identify one or more light rail corridors for potential Metro Link expansion. It is anticipated that this work will conclude in 2018.

A local example of addressing the evolving transit needs of the community is evident in how Madison County Transit (MCT) was able to implement innovative strategies to meet the challenge of providing improved transit access to jobs that located in Gateway Commerce Center (GCC), a low transit access area. In the last 10 years, the area has seen the development of several large warehousing operators in the GCC including the recent construction of an Amazon fulfillment center employing 2,600 people. To meet this need, MCT pursued Job Access and Reverse Commute (JARC) operating funds, extended local bus service, carpool/vanpool service and a guaranteed ride home program to vanpool users. MCT is working to increase the transit access to the GCC with increased bus service connections to the area beginning February, 2017. More information regarding MCT and the Gateway Commerce Center is in Appendix D.

In October of 2016, Bi State Metro was awarded an FTA discretionary 5309 Transit Oriented Development Planning Grant to plan for ways that diverse populations can benefit from a proposed 17-mile, 28-station Metro Link light rail line that will connect downtown St. Louis with the city's northern and southern limits. A significant portion of the corridor, particularly on the north side of St. Louis, is economically distressed and requires careful planning and incentives to attract development. Partners in the effort include the City of St. Louis, the East-West Gateway Council of Governments and the St. Louis Development Corporation. Final outcomes will include station-area multimodal access plans, land use and zoning policies, financial tools and incentives to implement TOD, and a citywide TOD implementation commission and program. The grant provided \$374,278 of federal financial assistance.

In addition to long-range projects intended to provide effective, attractive transit service, Metro continuously analyzes the performance of its Metro Bus system, with the goal of allocating resources in such a way that prioritizes access to jobs and other opportunities as efficiently as possible. To that end, Metro will embark on a comprehensive operational analysis (COA) in 2017. This assessment will combine industry best practices; public input; and Metro's experiences and recommendations to harmonize service planning and long-range transit planning to create a transit system that will meet the needs of the St. Louis region for the foreseeable future. This project team, which will include consultant assistance, Metro staff, planning partners and stakeholders, with input from the public, will explore the implementation or adjustment of service levels including route frequency and spacing; and service types which may include local service, limited service, express service, priority routes, demand responsive service, or hybrid mobility-on-demand / fixed-route service. Metro is also actively testing new vehicle types including electric and hybrid vehicles, and this work should help identify likely routes or markets for alternative vehicle types.

#### Ridership Trends:

Total transit ridership in the St Louis urbanized area is comprised of bus, demand response, paratransit and light rail transit modes.

Agency	2012 Ridership	2013 Ridership	2014 Ridership	2015 Ridership	%Change
Bi-State Development Agency	47,421,339	47,643,528	47,940,492	45,213,842	-5%

Since 2012, there has been a slight decrease in transit ridership. This decline is in line with national trends.

#### 4.5.3 Findings:

**Commendation 3:** Madison County Transit (MCT) is commended in implementing innovative strategies to meet the challenge of providing improved transit access to jobs that located in Gateway Commerce Center (GCC), a low transit access area

## 4.6 Transportation Improvement Program

### 4.6.1 Regulatory Basis

23 U.S.C. 134(c), (h) & (j) set forth requirements for the MPO to cooperatively develop a Transportation Improvement Program (TIP). Under 23 CFR 450.326, the TIP must meet the following requirements:

- Must cover at least a four-year horizon and be updated at least every four years.
- Surface transportation projects funded under Title 23 U.S.C. or Title 49 U.S.C., except as noted in the regulations, are required to be included in the TIP.
- List project description, cost, funding source, and identification of the agency responsible for carrying out each project.
- Projects need to be consistent with the adopted MTP.
- Must be fiscally constrained.
- The MPO must provide all interested parties with a reasonable opportunity to comment on the proposed TIP.

**4.6.2 Current Status:** The current TIP for the St. Louis area covers Fiscal years (FY) 2017-2020 and was approved by One DOT on September 28, 2016. The EWGCOG makes its TIP and all TIP modifications available to the public through its website at:

<http://www.ewgateway.org/trans/tip/tip.htm>

#### *TIP Project Development and Selection Process*

**Current Status:** Projects selected within the EWGCOG planning process and included in the TIP are consistent with and based on the ten principles that make up the framework of

*Connected2045*. The selection of projects is based on how the projects meet the goals and objectives of the Plan and considers future financial resources.

Since the 2013 Certification Review, the EWGOG has added charts to the document for enhancing the presentation of project delivery information to implementers and/or the public. These new visualization techniques include charts that show a breakdown of the funding by agency (MoDOT, IDOT, and transit), funding type, and state vs. local public agency obligations.

To better align with the goals of *Connected2045*, EWGCOG is currently working to revise the project application and selection process for the Surface Transportation Program – Sub-allocated (STP-S) program to ensure that projects of all types are considered equally for funding, based on a performance-driven approach. The policies in *Connected2045* reflect regional and national goals and guide the prioritization of federal funding for all modes of transportation, including roads, bridges, public transportation, freight, bicycle, pedestrian, and paratransit.

Decisions on local projects competing for federal funds are made through the annual TIP selection process, which evaluates projects according to the MTP principles. EWGCOG produces a TIP frequently asked questions (FAQ) section that answers potential questions, provides clarity, and adds readability to the TIP

**Commendation 4:** The EWGCOG is commended on their outreach work effort delivered as part of the TIP project development and selection process, that includes the TIP FAQ's that communicates how community resources are allocated within the region to LPA project sponsors and the general public.

**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 EWGOG 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 in the TIP. The timing of this early stage involvement should be at the time each SDOT is developing projects for inclusion in each agency's STIP. The Review Team observed the fulfillment of this collaboration and coordination requirement in connection with the MoDOT's selection of projects located within the MPA for inclusion in the MoDOT STIP. However, it is noted by the Review Team that the level of opportunity for the EWGCOG's meaningful participation in the IDOT early project development and development process is more limited.

**Recommendation 8:** The IDOT work together with the EWGCOG to formulate and implement an enhanced collaboration and coordination process that ensures the EWGCOG's earlier involvement in the IDOT's development and selection projects located within the MPA.

*Revenue and Cost Estimating (Demonstration of Fiscal Constraint)*

**Current Status:** 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. The EWGCOG's staff members collect anticipated revenue, operation and maintenance cost, and project cost data from each jurisdiction (local governments and transit operators) that has a project programmed in the TIP. The documentation of this collected data is presented in TIP Appendix F.

Project cost estimates are included for each SDOT and transit sponsored project submitted for inclusion in the TIP. Local project sponsor cost estimates are required to be included in each project application that is submitted to EWGCOG for federal sub-allocated funding.

**Finding:** The TIP is a fiscally constrained document for programmed highway and transit projects. Currently the TIP does not include fund reconciliation when the total amount of programmed operations and maintenance (O&M) and capital improvement project costs exceed the documented anticipated revenue of the local agency.

The Review Team and the EWGCOG observed opportunities to enhance the presentation of the documentation of available local revenue for funding TIP commitments and the overall demonstration of fiscal constraint. These improvement opportunities can be realized with minor modifications to multiple fiscal constraint tables found in TIP Appendix F.

**Recommendation 9** At the time of the next TIP update, the EWGCOG take steps to complete the following work efforts to enhance the clarity of the documented demonstration of fiscal constraint:

- Rename the "Transportation Programs Sub-allocated to St. Louis Metro Sub-allocated Federal Funding Table" presented in the current EWG TIP (Pg. 39), to clarify its application and modify to separately show the carryover balance (previously allocated but not programmed) amount available for programming at the start of FY2018. This amount plus the estimated annual allotment should be clearly shown as available for programming projects in FY2018.
- Show the total anticipated federal revenue in the revenue line item in the Financial Capacity by Funding Category –FHWA (in thousands)-Missouri Table (Pg. 40).
- Modifying the Financial Capacity by Funding Category –FHWA (in thousands)-Missouri Table (Pg. 40) to only show the anticipated MoDOT funding as MoDOT (Federal) and MoDOT (State) as an alternative to the various federal and state categories.
- Modify the Budgeted Local Revenue versus Budgeted Outlays Table (F-3 to F-8) in a manner that calculates an LPA's financial capacity for funding new TIP commitments that are processed in TIP modification actions completed throughout the program year.
- Modify the "Budgeted Local Revenue versus Budgeted Outlays" table (F-3 to F-8), to show LPA total O&M cost for locally owned federal-aid system lane miles.

**Finding:** The current TIP “Financial Capacity by Funding Category – FTA” does not show all reasonably anticipated federal funding (i.e. 5307, 5310, 5337 & 5339) available for funding transit projects in the out years. Nor does it show programmed transit project costs in multiple out years.

**Recommendation 10:** The EWGCOG and local transit agencies work together to implement the following practices when documenting the demonstration of fiscal constraint in connection with programmed transit projects:

- Show all anticipated federal revenue for each TIP horizon year, which is available for funding transit projects, regardless of the amount of programmed funding for each horizon year.
- The programming of all federal revenue that is shown as being available to fund transit in each year of the TIP horizon period.
- Complete a reconciliation action to ensure fiscal constraint when it is determined that the amount of programmed transit costs exceed the amount of anticipated federal and local revenue data shown for each given horizon year.

**Recommendation 11:** The EWGCOG take steps to educate the LPA project sponsors regarding the O&M cost estimates as part of their LPA workshops delivered in connection with the next TIP update cycle.

#### *TIP Modification Process*

**Current Status:** The EWGCOG recognizes two types of TIP modification actions; an amendment and an administrative modification. An amendment requires a Board approval action. The process to amend the TIP is streamlined so that EWGCOG requests any amendments from member agencies at the beginning of each month. An administrative modification action does not require the Board approval. 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.

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 ensures the demonstration of fiscal constraint and in the case of a new project, determines whether the project is regionally significant and whether it requires a new conformity determination finding and a special public comment period.

Following the Board approval action, an 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 federal ONE DOT approval.

A summary of all modifications is produced quarterly in the form of a TIP supplemental document that is uploaded to the EWGCOG TIP website page. Supplements will be developed 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.

A description of the TIP modification policy, including outlined criteria and procedures for amending the TIP and definitions, criteria, and procedures for administrative amendments, is described in the TIP.

**Finding:** Major modifications to the scope of work for SDOT and transit projects are recognized as possible amendment actions based on established criteria. The scope of work changes to SDOT or Transit projects can include those instances when the additional scope of work is funded with only SDOT or transit operator funding. Modification of scope of work for LPA sponsored projects is recognized as an administrative modification action.

It has been observed that there are major scope changes being made to LPA federal-aid projects without the knowledge of the EWGCOG staff, resulting in Financial Information Management System (FMIS) actions for LPA sponsored federal-aid projects being completed that are inconsistent with EWGCOG programming information. These LPA projects are being modified after being approved through the EWG CMAQ project development and selection process and programmed in the TIP. The timing of this modification is prior to the MoDOT St. Louis District submitting the project in FMIS for authorization of work and obligation of federal funds. The risk associated with not completing a TIP modification action in connection with these LPA federal-aid project scope changes include the absence of the demonstration of fiscal constraint, the scope of work and project cost documented in the FMIS action not being consistent with the programmed project information, absence of a validation of a previously completed environmental determination and in some cases the absence of additional emission benefits analysis.

**Finding:** At the time of the 2013 certification review and the current review on-site session, it was the understanding of the review team that administrative modification actions are included in to the EWGCOG Policy Board meeting agendas for information purposes. During the current review on-site session, the review team learned that documentation of administrative modification actions is not provided to the Policy Board for information purposes.

During the on-site session the review team discussed the need for the EWGCOG TIP modification policy to be updated to include major scope changes to LPA sponsored federal-aid projects under the amendment action that calls out the same for SDOT & transit sponsored projects.

**Recommendation 12:** The EWGOG take the following steps to enhance the effectiveness of their TIP modification policy:

- The EWGCOG and MoDOT work together to develop and implement a TIP modification process that ensures that the EWGCOG is made aware of the description of added scope and added cost to LPA projects and when there is a major scope change, fund source change or added cost for federally participating work currently described in the TIP.
- Update the TIP modification policy to include major scope changes to LPA sponsored federal-aid projects in the amendment action that currently calls out the same for SDOT & transit sponsored projects.
- Update the TIP modification policy to include the changing of funding sources (i.e. federal to state, state to federal) as an amendment action.
- Modify their TIP modification policy to call for providing the supplemental documentation developed in connection with a completed administrative modification action to be provided to the EWGCOG Policy Board for information purposes.

*Reasonable Progress Policy/Annual Listing of Obligated Projects(ALOP)*

**Current Status:** The EWGCOG has an established a “Reasonable Progress Policy” that effectively tracks the progress in the development and implementation of LPA sponsored programmed federal-aid projects as a means to reduce the financial risks associated with delays in all phases of project delivery. This policy can be viewed at:

**<http://www.ewgateway.org/pdffiles/library/trans/tip/reasprog/policy.pdf>**

East-West Gateway staff monitors locally sponsored projects using funding categories distributed through East-West Gateway in Missouri such as STP-S, Congestion Mitigation Air Quality (CMAQ), BRM (Bridge Replacement and Rehabilitation Program), and Transportation Alternatives Program (TAP). Sponsors are tracked throughout the year to ensure that they are staying on schedule.

**Finding:** The EWGCOG expressed to the review team that access to FMIS would be helpful for staff to be able to better track obligation of projects and to see allocations and apportionments of funding. Read only access to FMIS would also speed up the time it would take to begin the work effort to develop the ALOP report as staff would not have to wait for the SDOT’s to forward EWGCOG the information. The EWGCOG has requested to be given access to the Fiscal Management Information System 5.0 (FMIS5-P). To-date, this access has yet to be approved by the MoDOT.

The EWGCOG stated their willingness to complete FMIS training that would maximize their efficiency of uses allowed by FMIS5-P Category 2 (read only access).

**Recommendation 13:** The FHWA Missouri Division and MoDOT help the EWGCOG obtain Category 2 (read only access) access to the Fiscal Management Information System 5.0 (FMIS5-P).

**Recommendation 14:** The FHWA Missouri Division and MoDOT deliver training to the EWGCOG staff in how to maximize the value and efficiency of their Category 2 (read only access) access experience.

## **4.7 Public Participation**

### **4.7.1 Regulatory Basis**

Sections 134(i) (5), 134(j) (1) (B) of Title 23 and Section 5303(i) (5) and 5303(j) (1) (B) of Title 49, require an MPO to provide adequate opportunity for the public to participate in and comment on the products and planning processes of the MPO. The requirements for public involvement are detailed in 23 CFR 450.316(a) and (b), which require the development and use of a documented public participation plan that includes explicit procedures and strategies to include the public and other interested parties in the transportation planning process.

Specific requirements include giving adequate and timely notice of opportunities to participate in or comment on transportation issues and processes, employing visualization techniques to describe metropolitan transportation plans and TIPs, making public information readily available in electronically accessible formats and means such as the world wide web, holding public meetings at convenient and accessible locations and times, demonstrating explicit consideration and response to public input, and a periodically reviewing of the effectiveness of the participation plan.

**4.7.2 Current Status:** The Board adopted EWGCOG Public Involvement Plan (PIP) in June of 2014, and they have worked to advance the goals and objectives in the PIP. Examples of this include increasing the types of opportunities for participation, including the expansion of public comment opportunities in the development of the FY 2016 – 2019 TIP. The public was invited to comment on the sub-allocated STP-S and CMAQ project applications during the project solicitation and evaluation phase. Using the EWGCOG website, the public could access an email form to submit comments on the applications. An example of broader application of PIP goals and objectives in the Connected 2045 Public Engagement Process included a number of opportunities for the public to learn about the MTP development process and provide input into the development of the long-range plan. A survey was also developed and made available to the public. EWGCOG hosted a four-part speaker series, in partnership with the Missouri History Museum that explored transportation issues in the region as part of the long-range plan update.

EWGCOG continues to be available and ready to work with those that are traditionally underserved. EWGCOG provides technical assistance, on request, to service providers, community leaders and municipalities who want to offer better counsel to their clients on

mobility matters. EWGCOG is in the process of updating the Coordinated Human Service Transportation Plan (CHSTP), a process that requires service providers, stakeholders and staff takes an active role, by providing input and feedback, in order to ensure a responsive plan that addresses the needs of the region's underserved populations. The CHSTP should be completed in late spring of 2017.

#### **4.7.3 Findings:**

EWGCOG considers the integration of technology into the metropolitan transportation process a top priority. We see many examples of this integration throughout the public participation process. These include the placement of videos on the EWGCOG website, the ability for the public to submit comments on the STP-S and CMAQ applications received during project solicitation, and the use of online chat sessions.

**Recommendation 15:** Recommend EWGCOG evaluate and document the outcome of public outreach participation activities.

EWGCOG is consistently looking for ways to reach out to the public. However, there is an opportunity to enhance the value of efforts through the evaluation of outreach activities to outcomes. For example, it is noted that public input was sought on STP-S and CMAQ applications as a component of the FY 2016-2019 TIP, and that this effort led to an increase in input on the draft plan. The EWGCOG could identify any changes or additions that were made to the plan based on the specific input received from the public.

It is recommended that EWGCOG update their website to make it more user friendly and easier to navigate. Through the EWGCOG Public Involvement Plan, they identified the need to update their public website. This updated website should more effectively promote plans, programs and initiatives to the public and thus further enhance involvement in the transportation planning process.

## **4.8 Civil Rights (Title VI, EJ, LEP, ADA)**

### **4.8.1 Regulatory Basis**

Title VI of the Civil Rights Act of 1964, prohibits discrimination based upon race, color, and national origin. Specifically, 42 U.S.C. 2000d states that "No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance." In addition to Title VI, there are other Nondiscrimination statutes that afford legal protection. These statutes include the following: Section 162 (a) of the Federal-Aid Highway Act of 1973 (23 U.S.C. 324), Age Discrimination Act of 1975, and Section 504 of the Rehabilitation Act of 1973/Americans with Disabilities Act (ADA) of 1990. ADA specifies that programs and activities funded with Federal dollars are prohibited from discrimination based on disability.

Executive Order #12898 (Environmental Justice) directs federal agencies to develop strategies to address disproportionately high and adverse human health or environmental effects of their programs on minority and low-income populations. In compliance with this Executive Order, USDOT and FHWA issued orders to establish policies and procedures for addressing environmental justice in minority 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, be sought out and considered.

Executive Order # 13166 (Limited-English-Proficiency) requires agencies to ensure that limited English proficiency persons are able to meaningfully access the services provided consistent with and without unduly burdening the fundamental mission of each federal agency.

**4.8.2 Current Status:** The EWGCOG’s 2015 Title VI Program was approved by the Board of Directors in January 2016. The approved Plan includes Title VI assurances and a commitment to non-discrimination, provides a complaint process and procedures, public involvement and language assistance plans, and calls for addressing of mobility needs of residents and traditionally underserved populations.

EWGCOG staff 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. In the development of the Connected2045 investment plan, all projects reviewed for inclusion in the plan were evaluated for the level at which they impacted an EJ community, supported access to community resources and quality jobs, and enhanced transit.

EWG Staff have working relationships with a number of community organizations that work with Limited English Proficiency (LEP) populations such as the International Institute, Mosaic, St. Louis Association of Neighborhood Organizations, Equal Housing Opportunity Commission, and is fostering relationships with the Bosnian Chamber of Commerce, the Chinese Chamber of Commerce and the Hispanic Chamber of Commerce, who says that they are seeing an increase in participation from the minority population.

At public meetings, EWG prominently displays the following resources:

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

ADA issues in the St. Louis region have been identified. Disabled individuals living in the rural areas typically have more transportation difficulties due to limited transportation options.

Additionally, some disabled individuals who receive services may require greater assistance or cannot physically reach bus facilities because of accessibility limitations.

For locally sponsored projects utilizing STP-S, CMAQ, or TAP funding, EWGCOG added a question to the project applications regarding ADA Transition Plans and the status of such plans for each member agency. Local agency sponsors are aware that projects must meet the requirements of ADA.

#### **4.8.3 Findings:**

EWGCOG continues to demonstrate effort toward the advancement of its Title VI program and the inclusion of those typically underserved. Despite EWGCOG adding the question of the status of ADA Transition Plans on project applications, ADA Transition Plans remains an area of concern. Many LPA's have not submitted Transition Plans. There has also been concern with ensuring that CMAQ and STBG projects are constructed in a manner that complies with ADA

**Recommendation 16:** EWGCOG should work with MoDOT to increase outreach and education to the LPA's on the importance of ADA Transition Plans. Additionally, project applications and plans should be reviewed to ensure that ADA requirements are included in cost estimates.

It appears as though EWGCOG is consistently looking for ways to reach out to the public including those traditionally underserved. However, there is a lack of the direct linkage of outreach activities to outcomes. EWGCOG is encouraged to find ways to track the results of their outreach efforts.

## **4.9 Freight Planning**

### **4.9.1 Regulatory Basis**

The MAP-21 established in 23 U.S.C. 167 a policy to improve the condition and performance of the national freight network and achieve goals related to economic competitiveness and efficiency; congestion; productivity; safety, security, and resilience of freight movement; infrastructure condition; use of advanced technology; performance, innovation, competition, and accountability, while reducing environmental impacts.

In addition, 23 U.S.C. 134 and 23 CFR 450.306 specifically identify the need to address freight movement as part of the metropolitan transportation planning process.

**4.9.2 Current Status:** The 2013 St. Louis Regional Freight Study identified the need for a Regional Freight Transportation District. The St. Louis Regional Freightway was created as an all-purpose authority for freight operations and opportunities within the St. Louis region. The St. Louis Regional Freightway was publicly launched at the 2016 Freight Summit. The event

featured an address by special guest, Federal Highway Administration Administrator Gregory Nadeau. The Freight Summit also celebrated the live launch of <http://www.thefreightway.com/>

The EWGCOG's effort to complete the 2013 St. Louis Regional Freight Study and implement its recommendations, including the formation of the St. Louis Regional Freightway, was a catalyst for MoDOT effort to produce a Multi-Modal Statewide Freight Plan in 2015 and for MoDOT's current effort to formulate a new and enhanced Freight Advisory Committee framework that will afford for a greater level of collaboration and coordination between the MoDOT and Missouri MPOs. The framework includes the creation of a new Statewide Freight Advisory Committee and Regional Freight Advisory Committees. The St. Louis Regional Freightway Council will act as the St. Louis Regional Freight Advisory Committee. The St. Louis Regional Freightway Council is a group of leaders comprised of multi-modal representatives, regional public and private leadership, governmental representatives and corporate leaders. Eight of the council members represent the seven counties of the bi-state area along with the City of St. Louis, which cumulatively comprise the St. Louis Regional Freightway.

The Freightway has created a freight development project list which includes projects that are intended to help drive economic growth through freight infrastructure improvements and raise awareness and support for multimodal infrastructure funding. This list was endorsed by the EWGCOG's Board of Directors in October 2016 and projects such as the I-270 bridge replacement over the Mississippi River and widening of I-270 in North St. Louis County are included in the investment plan of Connected2045. The long range transportation plan also includes freight performance measures that are tracked by the EWGCOG's staff. The EWGCOG houses the majority of the St. Louis regions GIS inventory on freight related items. The St. Louis Freightway has incorporated this data to create a live web-mapping tool located on their website: <http://www.thefreightway.com/regional-freightway-map/> This online mapping tool is designed to inform prospective site developers and local stakeholders about the ongoing freight system in the St. Louis Region. As land use changes and freight-oriented development impact the transportation system, the EWGCOG staff monitors the roadway network and adjusts the transportation model accordingly.

The EWGCOG's TIP evaluation process includes a component on goods movement. The STP-S project evaluation utilizes six evaluation areas based on the Ten Guiding Principles in Connected2045. One of the evaluation areas is goods movement, which includes the analysis of 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). A recent update to STP-S criteria, calls for additional emphasis to be placed on freight projects including ensuring reliable truck travel times, strengthen multimodal connections to the 23 key industrial site areas, and relationship to the National Highway Freight Network.

The EWGCOG metropolitan transportation planning process reflects the very successful integration of the consideration of freight movement at all transportation investment planning

and project programming points. This effort has served as a foundation for the goal to make the St. Louis region a premier freight center in the Midwest through job and economic growth.

#### **4.9.3 Findings:**

**Commendation 5:** The EWGCOG's is commended for their ongoing effort to champion the integration of freight movement into the overall St. Louis metropolitan planning process, including the project prioritization and selection for programming.

**Commendation 6:** The EWGCOG, MoDOT and the St. Louis Regional Freightway are commended for their partnering effort to formulate the St. Louis regional element of the Missouri Statewide Freight Advisory Committee framework.

**Recommendation 17:** FHWA, MoDOT, IDOT and EWGCOG work together to seek future freight training opportunities to support and to integrate the consideration of freight movement into the St. Louis metropolitan transportation planning process.

## **4.10 Transportation Safety**

### **4.10.1 Regulatory Basis**

23 U.S.C. 134(h)(1)(B) requires MPOs to consider safety as one of ten planning factors. As stated in 23 CFR 450.306(a)(2), the planning process needs to consider and implement projects, strategies, and services that will increase the safety of the transportation system for motorized and non-motorized users.

In addition, SAFETEA-LU established a core safety program called the Highway Safety Improvement Program (HSIP) (23 U.S.C. 148), which introduced a mandate for states to have Strategic Highway Safety Plans (SHSPs). 23 CFR 450.306 (d) requires the metropolitan transportation planning process should be consistent with the SHSP, and other transit safety and security planning.

**4.10.2 Current Status:** The Missouri Coalition for Roadway Safety (MCRS) is a partnership of Missouri safety advocates, including law enforcement agencies, health care providers, courts, local, state and federal government agencies, advocacy groups, planning organizations, concerned citizens and others. The MCRS is organized into three parts: executive committee, 10 state-level subcommittees and seven regional coalitions. Those who serve on these committees and coalitions are recognized to be safety champions. A major benefit of the strategic planning effort has been combining the strengths and resources of all the various safety partners, including MPOs such as the EWGCOG

Missouri's Blueprint for Safer Roadways is a four-year plan that can be viewed at:  
<http://www.savemolives.com/documents/Blueprint2012-2016.pdf> Additional information

about the comprehensive effort by the MoDOT to improve highway safety in Missouri can also be viewed on the MoDOT website at: <http://www.modot.org/safety/index.htm>

The EWGCOG has embraced its role as a safety champion for the St. Louis metropolitan planning area through active involvement in the MCRS work effort as it relates to the development of strategies to improve safety and reduce roadway fatalities and serious injuries. The EWGCOG's Executive Director is a member of the MCRS Executive committee and a staff member served on the Blue Print Revision Working Group.

The St. Louis region coalition, (MoDOT), and the EWGCOG have partnered together to create specialized Strategic Highway Safety Plan (SHSP) for each of the five Missouri counties in St. Louis region. The partners are committed to implementing strategies in the plans that include countermeasures specific to that county's local roads and circumstances. At the request of the EWGCOG, the IDOT has created SHSPs for each of the region's Illinois counties (Madison, Monroe, and St. Clair).

The EWGCOG's transportation planning process does an excellent job of developing and implementing projects, strategies, and services increase the safety of the St. Louis region transportation system for motorized and non-motorized users

**4.10.3 Findings:** There are no findings in this review area.

## **4.11 Transportation Security Planning**

### **4.11.1 Regulatory Basis**

23 U.S.C. 134(h)(1)(C) requires MPOs to consider security as one of ten planning factors. As stated in 23 CFR 450.306(a)(3), the Metropolitan Transportation Planning process provides for consideration of security of the transportation system.

The regulations state that the degree and consideration of security should be based on the scale and complexity of many different local issues. Under 23 CFR 450.324(h), the MTP should include emergency relief and disaster preparedness plans and strategies and policies that support homeland security, as appropriate.

### **4.11.2 Current Status:**

#### *FTA Section 5307 Funding Requirements*

The St Louis area FTA Chapter 5307 designated recipient complies with the requirement to spend at a minimum 1% of 5307 funds on safety and security projects within the region. As the designated recipient, Bi-State Metro is charged with ensuring regional cooperation and fulfilling the required spending threshold.

*Security of the Transportation System* The EWGCOG continues to perform the lead role in defining security planning for the St. Louis region 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.

The St. Louis Area Regional Response System ("STARRS"), developed by the EWGCOG, is a regional organization developed to coordinate planning and response for large-scale critical incidents in the bi-state St. Louis metropolitan region. 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 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. More information regarding STARRS can be accessed at: <http://www.stl-starrs.org/>

The EWGCOG's metropolitan planning process continues to champion the consideration of security of the transportation system

**4.11.3 Findings:** There are no findings in this review area

## **4.12 Non-motorized Planning/Livability**

### **4.12.1 Regulatory Basis**

23 U.S.C. 217(g) states that bicyclists and pedestrians shall be given due consideration in the comprehensive transportation plans developed by each MPO under 23 U.S.C. 134. Bicycle transportation facilities and pedestrian walkways shall be considered, where appropriate, in conjunction with all new construction and reconstruction of transportation facilities.

23 CFR 450.306 sets forth the requirement that the scope of the metropolitan planning process "will increase the safety for motorized and non-motorized users; increase the security of the transportation system for motorized and non-motorized users; and protect and enhance the environment, promote energy conservation, improve the quality of life.

**4.12.2 Current Status:** EWGCOG committee structure integrates multimodal participation on both the Transportation Advisory Committee and the Bicycle and Pedestrian Committee. Bicycle and pedestrian improvements are incorporated throughout the St. Louis area TIP. While many MODOT and locally sponsored road projects include bike/ped improvements, the majority of explicit bicycle and pedestrian spending is programmed through MPO sub-allocated programming such as the STP-S, TAP and CMAQ.

In January 2012, the EWGCOG Board endorsed the Gateway Bike Plan. The Great Rivers Greenway District led the collaborative effort to prepare the Gateway Bike Plan, working in partnership with EWGCOG, City of St. Louis, the counties of St. Louis and St. Charles, Bi-State Development, Trailnet, and MoDOT. The Gateway Bike Plan provides a long term vision for a

connected system of on road bicycle routes between communities, transit, greenways, and trail. TIP project sponsors are informed about the Gateway Bike Plan in the project development process. In 2013, the Council organized the Gateway Bike Plan Working Group, a subcommittee to the Council's Bicycle and Pedestrian Advisory Committee, to work on the implementation of the Gateway Bike Plan.

The Gateway Bike Plan can be viewed at: <http://greatriversgreenway.org/about-us/projects-in-partnership/gateway-bike-plan/>

Since the last Federal Certification Review (4/15/13), the EWGCOG has created the Gateway Bike Plan-Working Group (GBP-WG) that is charged with advising the BPAC on all matters relating to the use of the bicycle as a means of transportation or recreation on the implementation and assessment of the Gateway Bike Plan. The GBP-WG meets quarterly.

### *Livability and Sustainability*

In the OneSTL, HUD funded, planning effort, EWGCOG has incorporated Livability principles spanning land use, environmental concerns, social considerations and financial limitations as well as better leveraging the diverse government programs to accomplish regional goals. According to the "State of the System 2045", a supplement of the MTP, OneSTL:

Provides a regional framework for sustainable development that citizens, non-profit organizations, businesses, and local governments can use to make better use of resources and better meet the aspirations and needs of residents. OneSTL covers transportation in several areas Transportation is identified as A "Regional Opportunity" to foster economic development and protect the environment. The majority of Transportation goals in OneSTL are found in the Connected Theme but other goals can be found in Prosperous, Distinctive, and Efficient.

In summary, OneSTL plan recommends construction of more transit-oriented development incorporation of multi-modal facilities into roadway design and maintenance reducing combined housing and transportation costs, design of more complete streets expansion of the regional bicycle network, increasing transit ridership educational programs on bicycle and pedestrian safety improving and maintaining the safety of the overall system improving regional freight efficiency coordination between transportation agencies and other public service providers on public right-of-way projects

The EWGCOG Great Streets Initiative emphasizes the safe coexistence of all modes of travel, including vehicular, pedestrian, public transit and bicycling. Consideration of the effect of how street design choices affect the pedestrian experience and the abutting land uses is central to this initiative. The EWGCOG champions the effort for planners, designers, and developers to create an environment that suits walking, bicycling, and transit; and promotes the taming of traffic in a way that still allows for mobility, but at

speeds that are safe and not threatening to pedestrians. The Great Streets Guide can be found at [www.greatstreetsstlouis.net](http://www.greatstreetsstlouis.net)

The EWGCOG TIP project selection process for STP-S funded projects continues to encourage all communities to incorporate the Great Streets principles into their proposed roadway project applications. This has resulted in more local communities incorporating bicycle and pedestrian facilities into federal-aid roadway projects.

**4.12.3 Findings:** There are no findings in this review area

## **4.13 Integration of Land Use and Transportation**

### **4.13.1 Regulatory Basis**

23 U.S.C. 134(g)(3) encourages MPO's to consult with officials responsible for other types of planning activities that are affected by transportation in the area (including State and local planned growth, economic development, environmental protection, airport operations, and freight movements) or to coordinate its planning process, to the maximum extent practicable, with such planning activities.

23 U.S.C. 134 (h)(1)(E) and 23 CFR 450.306(a)(5) sets forth requirements for the MPO long range plan to protect and enhance the environment, promote energy conservation, improve the quality of life, and promote consistency between transportation improvements and State and local planned growth and economic development patterns.

### **4.13.2 Current Status:**

#### *Comprehensive Land Use Integration in Metropolitan Transportation Planning*

In 2010, EWG embarked upon a three-year collaborative planning process along with ten consortium partners to develop a regional framework for sustainable development. The planning effort was funded by grant from the US Department of Housing and Urban Development's Sustainable Communities Regional Planning Grant Program. The result was "OneSTL – Many Communities. One Future." OneSTL is a plan for creating a prosperous, healthy and vibrant region. As part of the OneSTL effort EWG held an extensive number of public meetings, involved over 200 stakeholders in planning committee, and issued 75 technical plans and reports. Through this extensive engagement and research process, a vision, goals and objectives that reflect what the people of St. Louis want for their future were identified. Subsequently, implementing strategies, tools and resources were developed. The plan is designed to enable citizens, non-profit organizations, businesses, and local governments make better use of resources and better meet the aspirations and needs of residents.

The EWGCOG's encourages the Board of Directors, comprised of regional elected officials who control land use planning in their respective jurisdictions, to consider the nexus between land use and transportation but as an MPO the Council lacks the statutory authority for matters such as zoning or permitting.

Another local effort designed to connect land use and transportation is Transit Oriented Development (TOD). Bi-State Metro encourages TOD at key Metro link stations and recommendations for such plans have been incorporated into the Connected 2045 Metropolitan Transportation Plan.

In October of 2016, Bi State Metro was awarded a discretionary FTA 5309 Transit Oriented Development Planning Grant to plan for ways that diverse populations can benefit from a proposed 17-mile, 28-station Metro Link light rail line that will connect downtown St. Louis with the city's northern and southern limits. A significant portion of the corridor, particularly on the north side of St. Louis, is economically distressed and requires careful planning and incentives to attract development. Partners in the effort include the City of St. Louis, the East-West Gateway Council of Governments and the St. Louis Development Corporation. Final outcomes will include station-area multimodal access plans, land use and zoning policies, financial tools and incentives to implement TOD, and a citywide TOD implementation commission and program. The grant provided \$374,278 of federal financial assistance.

*Environmental Mitigation Policies, Programs and/or Strategies:*

The EWGCOG, in partnership with the Missouri Resource Assessment Partnership (MoRAP) at the University of Missouri-Columbia, developed a Regional Ecological Framework (REF), which provides a regional and local, ecosystem-level planning approach to avoid, minimize, and mitigate the environmental impacts of existing and future infrastructure investments. This partnership has proven to be invaluable. 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, at both landscape and site specific scales.

The key overarching component of the Ecological Initiative is consultation and coordination with and among federal, state and local resource agency partners in the development and application of ecological geospatial data tools.

Since the last Certification Review, agency staff participated in a Strategic Highway Research Program (SHRP) II C40B Proof-of-Concept: Application of Geospatial, Ecological Tools and Data in the Planning and Programming (pre-NEPA) Phases of Delivering New Highway Capacity. Based on the consultation process with state and local resource agencies, an effort was undertaken to better depict the pervious areas within the more urbanized areas of the region. Collaboration on this effort led to the development of a refined land cover classification for the urbanized areas of the region. The refined land cover has been applied a majority of the region's urban geography and the resulting data is being incorporated into the I-70 PEL Study,

the Metro Link Northside/Southside study as well as the Lower Meramec Watershed Plan Update.

#### **4.13.3 Findings:**

**Commendation 7:** The EWGCOG's ongoing effort to engage agencies early in the planning process as resulted in reduced or avoided impacts to key ecological priorities while advancing the transportation program goals

### **4.14 Air Quality**

#### **4.14.1 Regulatory Basis**

The air quality provisions of the Clean Air Act (42 U.S.C. 7401) and the MPO provisions of Titles 23 and 49 require a planning process that integrates air quality and metropolitan transportation planning, such that transportation investments support clean air goals. Under 23 CFR 450.324(m), a conformity determination must be made on any updated or amended transportation plan in accordance with the Clean Air Act and the EPA transportation conformity regulations of 40 CFR Part 93. A conformity determination must also be made on any updated or amended TIP, per 23 CFR 450.326(a).

**4.14.2 Current Status:** The St. Louis transportation management area (TMA) is classified as nonattainment with tropospheric ozone 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 State Implementation Plans (SIP's). The IACG is comprised of EWGOG staff and federal and state transportation and air quality partners. One of the primary functions of the 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 MTP/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.

In 2013 the IACG developed an updated "Conformity Determination Users Guide" with Appendices A - F. The Guide describes the steps involved in a Conformity Determination and the roles and responsibilities of IACG members. The Appendices include such items as: the

Regionally Significant Project Screening Criteria; roles and responsibilities in SIP development and Conformity Determinations; Hot-Spot considerations for project sponsors; and a glossary of air quality and conformity terms. The update work effort include the formulation of a resource criteria document for helping the IACG, at the time of the group's vetting process for the TIP update, to identify projects that may require project level "hot spot" analysis. The project sponsor is required to seek the IACG input in the "how" aspect of competing the necessary analysis. The results of this vetting process are passed on to the project sponsor for their consideration in the development of the sponsor's project level environmental determination analysis.

Over the last few years, it has been observed by MoDOT and FHWA Missouri Division that some local public agency project sponsors are electing to complete the environmental determination phase of project delivery for projects not included in the EWGCOG MTP or TIP. In these cases, there is no trigger for the IACG to complete their vetting for the consideration of project level "hot spot" analysis. During the "on-site" session, the review team and the participants discussed the value of the MoDOT and FHWA Division sharing the IACG's project level "hot-spot" analysis tool with local project sponsors at the time the project sponsor begins their project environmental determination work effort. The MoDOT and FHWA Division would share the analysis tool and educate the local project sponsor on how to complete the analysis tool and document the outcome. This outreach effort would be delivered in at the start of all project level environmental determinations that require FHWA approval as well as for programmatic environmental determination actions administered by the MoDOT.

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 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 and results in the support and development of transportation investments for the entire bi-state metropolitan area.

#### **4.14.3 Findings:**

**Recommendation 18:** The EWGCOG and IDOT coordinate to provide the resources necessary to replace antiquated ITS equipment and ATMS software and to properly train District personnel in order to bring the system up to current standards using the latest technology.

## **4.15 Congestion Management Process / Management and Operations**

### **4.15.1 Regulatory Basis**

23 U.S.C. 134(k) (3) and 23 CFR 450.322 set forth requirements for the congestion management process (CMP) in TMA's. The CMP is a systematic approach for managing congestion through a process that provides for a safe and effective integrated management and operation of the

multimodal transportation system. TMA's designated as non-attainment for ozone must also provide an analysis of the need for additional capacity for a proposed improvement over travel demand reduction, and operational management strategies.

23 CFR 450.324(f) (5) requires the MTP include M&O of the transportation network as an integrated, multimodal approach to optimize the performance of the existing transportation infrastructure. Effective M&O strategies include measurable regional operations goals and objectives and specific performance measures to optimize system performance.

**4.15.2 Current Status:** During the 2013 Certification Review, the MPO received a Corrective Action due to the lack of a required Congestion Management Process (CMP). As a result of that finding, the current CMP was developed in a timely manner and approved by the Policy Board of Directors in September of 2013. CMP subcommittees include the Congestion Management and Operations Committee (CMOC) and the Technical Action Committee (CAC). Regular bi-monthly meetings of the committees are held which have led to better understanding of the status of maintenance and operations for the various stakeholders and provides for ongoing discussions between regional multi-modal transportation systems. Regional congestion maps were developed for the 2015 CMP report based on the National Performance Measure Research Data Set travel times.

Working through the CMOC, a Regional Intelligent Transportation System (ITS) Data Sharing Initiative project was supported by MoDOT and St. Charles County which will provide standardizations of data and video exchange. This group was also engaged in the update of the Regional ITS Architecture Strategic Deployment Plan. Applicants for ITS projects must complete an ITS Architecture Consistency Statement.

Assessment and documentation includes an annual CMP report on regional congestion, mitigation efforts and evaluation results.

The updated CMP has increased regional awareness of the benefits of management and operations (M & O) in managing the transportation system and increased emphasis on projects that improve management and operations in the region. The EWGCOG's use CMAQ funding for M & O related projects has increased as a result. The CMP has been used extensively in the development and funding of projects such as ITS expansion and upgrades, traffic signal system upgrades, and optimization of coordinated traffic signal system corridors. The UPWP includes an "Integrated Transportation Systems Management" element devoted to M&O, CMP, and ITS activities.

#### *Intelligent Transportation Systems (ITS) Architecture*

**Current Status:** The St. Louis 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 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 and is recognized as a regional partnership between MODOT, IDOT, EWGCOG and the Metro.

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 EWGCOG led a successful effort to complete a comprehensive update of the Intelligent Transportation System (ITS) Architecture for the St. Louis Metropolitan Region in July 2015. The Executive Summary developed as part of this work effort, produced seven ITS goals established by the ITS Steering Committee.

The IDOT District 8 ITS system's functionality has deteriorated significantly from what it once was due to an apparent lack of support for a number of past years. Currently the ITS system has antiquated equipment and ATMS software, and lacks adequate and properly trained staffing. Over the last several years, the EWGCOG has encouraged IDOT to commit funds to rebuild and improve their system.

The current IDOT District 8 ITS and Operations staff fully supports the EWGCOG request and has begun making some progress in updating and rebuilding the system. However, there is still a need for additional funding and properly trained personnel in order to bring the system up to current standards using today's technology. The EWGCOG continues to promote the need for IDOT's full commitment to this effort, at all levels of the IDOT organization, to provide the resources necessary to achieve this goal.

#### **4.15.3 Findings:**

**Commendation 8:** The EWGCOG is commended for developing a functioning CMP and utilizing the CMOC and TAC to share information, providing assistance for member agencies and encouraging ITS investment in the region.

**Recommendation 19:** Recommend the EWGCOG and IDOT coordinate to provide the resources necessary to replace antiquated ITS equipment and ATMS software and to properly train District personnel in order to bring the system up to current standards using the latest technology.

## **5.0 CONCLUSION**

### **Certification Action:**

The FHWA and FTA FY2017 certification review found that the metropolitan transportation planning process conducted in the St. Louis urbanized area meets Federal planning requirements. The EWGCOG is found to conduct planning activities in a continuing, cooperative, and comprehensive manner in coordination with its regional partners, as well as, fulfilling the federally required multi-modal and participatory planning process.

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, Missouri Transportation Management Area for the period April 16, 2017 to April 15, 2021 is certified as meeting the requirements as described in 23 CFR Part 450 and 49 CFR Part 613.

## APPENDIX A - PARTICIPANTS

The following individuals were involved in the St Louis urbanized area on-site review:

• First Name	Last Name	Agency
Staci	Alvarez	EWGCOG
Traci	Baker	FHWA-Illinois Division
Royce	Baur	EWGCOG
Mark	Bechtel	Federal Transit Administration-Region VII
Tracy	Beidleman	Bi-State Metro
Jerry	Blair	EWGCOG
Tom	Blair	MODOT
Anna	Corniel	Federal Transit Administration-HQ
Vontra	Giles	FHWA-Illinois Division
Randall	Glaser	MODOT
C.William	Grogan	St. Clair County Transit
Enos	Han	FHWA- Missouri Division
Mike	Henderson	MODOT
Paul	Hubbman	EWGCOG
Dan	Hutti	EWGCOG
Kevin	Jemison	IDOT
Frank	Johnson	EWGCOG
Curtis	Jones	IDOT
Vince	Kaimann	MODOT
Peter	Koeppel	EWGCOG
Mary	Lamie	St. Louis Regional Freightway
Jason	Lange	EWGCOG
Mary Grace	Lewandowski	EWGCOG
Christopher	Michael	EWGCOG
SJ	Morrison	Madison County Transit
Anna	Musial	EWGCOG
Holly	Ostdick	IDOT
Lauren	Paulwell	FHWA- Missouri Division
Rachael	Pawlak	EWGCOG
Sonya	Pointer	EWGCOG
Roy	Rodgers	EWGCOG
Lubna	Shoab	EWGCOG
Jeremiah	Shuler	Federal Transit Administration-Region VII
Melissa	Theiss	EWGCOG
Betsy	Tracy	FHWA-Illinois Division
Jim	Wild	EWGCOG- (Ex Director)

Aaron	Young	EWGCOG
Heather	Hamilton	EPA
Laura	Ellen	MODOT
Kevin	Jemison	IDOT
Chris	Schmidt	IDOT
Jon Paul	Kohler	FHWA-IL
JD	Stevenson	FHWA-IL
Rodney	Halbert	EWGCOG
Carol	Lawrence	EWGCOG
John	Posey	EWGCOG
Larry	Grither	EWGCOG
Jim	Mollet	IDOT
Kevin	Herdler	STLRCC
Andy	Knott	Sierra Club
Kelly	Beline	Madison County Transit

## APPENDIX B - STATUS OF FINDINGS FROM THE FY 2013 REVIEW

One of the priorities of each certification review is assessing how well the planning partners in the area have addressed corrective actions and recommendations from the previous certification review. This section identifies the corrective actions and recommendations from the previous certification and summarizes discussions of how they have been addressed.

### Corrective Action 1:

Disposition:

No.	Recommendation	Implementing Agency	Disposition
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	EWGCOG	The East-West Gateway Board of Directors currently includes MoDOT, IDOT, and Metro as non-voting members of the Board. Additionally, many of the elected officials of the EWGCOG Board (who are voting members) represent local transit operators by being part of their governing and/or funding structures.  NOT IMPLEMENTED
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.	EWGCOG	The EWGCOG and the SDOTs worked together to update the Urban Area Boundary (UAB) map for the St. Louis region to reflect the 2010 Census defined urban area (UZA). The updated UAB Map for the Missouri portion of the urban area was approved by the EWGCOG Policy Board on 9/30/14 and the FHWA Missouri Division on 11/14/14. All required urban areas are included in the final UAB map (MO.).  IMPLEMENTED

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.	EWGCOG	<p>Due to the length of approval times by the SDOTs and Federal agencies the EWGCOG has elected to continue the practice of posting the Policy Board approved maps on the website prior to FHWA formal approval. EWGCOG adopted the practice of placing the following statement on their online maps until the point that FHWA approvals are granted, at which point the statement is removed:</p> <p><i>"The newest revisions to the Missouri and Illinois Roadway Functional Classification maps are currently awaiting final approval from state and federal officials. The latest maps are shown here to bring applicants up to date on recent changes, but it must be noted that these maps are not official until final approval is received."</i></p> <p>MODIFIED IMPLEMENTATION</p>
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	EWGCOG, MoDOT, IDOT & Local Partners	<p>EWCOG and its state and local partners have delivered an ongoing effort 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.</p> <p>IMPLEMENTED</p>
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.	EWGCOG	<p>EWGCOG has a strong history of considering the special needs of elderly, disabled and low income individuals in the transportation planning process. As in the past, EWGCOG's has continued to their ongoing work with those groups and strive to address their ever changing needs through the EWGCOG's transportation planning process.</p> <p>IMPLEMENTATION ONGOING</p>
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.	EWGCOG	<p>EWGCOG's Connected2045 LRTP was adopted by the Policy Board on 6/24/15. It includes a State of the System and Technical Supplement information package as an Appendix.</p> <p><a href="http://www.ewgateway.org/trans/longrgplan/longrgplan.htm">http://www.ewgateway.org/trans/longrgplan/longrgplan.htm</a></p> <p>IMPLEMENTED</p>

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	EWGCOG	The EWGCOG facilitated early and continuous collaboration and coordination with local, State and Federal planning partners in the development and review phases of their work effort to develop the Connected2045 LRTP.  IMPLEMENTED
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.	EWGCOG	The EWGCOG solicited for locally sponsored regionally significant projects as part of the work effort to develop the Connected2045 LRTP. The solicitation advised local agencies of the requirement for the project proposal to include a reasonable financial plan. Only one local sponsor responded, but the sponsor could not specify how the project would be financed.  IMPLEMENTED  The EWGCOG Connected2045 LRTP continued the practice of including SDOT and transit agency sponsored projects in an “illustrative” status. These projects can be drawn into the fiscal constrained (priority) element of the LRTP if additional revenues become available. The EWGCOG elected to not include LPA sponsored projects in the “illustrative” status on the basis that LPA illustrative projects have a much less likelihood, than SDOT and transit agency projects, for the infusion of additional funding.  NOT IMPLEMENTED
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.	EWGCOG	As part of the development of the OneSTL Plan for Sustainable Development and the Connected2045 LRTP, the EWGCOG incorporated performance based planning and scenario planning concepts into the overall metropolitan transportation planning process. <a href="http://onestl.org/indicators">http://onestl.org/indicators</a>  IMPLEMENTED

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.	EWGCOG/ MoDOT/IDOT	<p>MoDOT initiated monthly MAP-21 performance management webinars in March 2015. Participants in the current FAST ACT/MAP-21 monthly webinars include the Missouri MPOs, SDOT representatives from the States that share MPOs with Missouri, FHWA and FTA. EWG participates in the monthly webinars to discuss the implementation of FAST Act performance measures, including target setting. Additionally, the EWGCOG's staff has had in-person meetings with MoDOT and attended workshops about target setting.</p> <p>EWG staff also participated in an Illinois state safety target setting coordination workshop in Springfield hosted by IDOT.</p> <p>IMPLEMENTED (ONGOING)</p>
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).	MoDOT	<p>MoDOT developed the statewide long range plan by embarking on an unprecedented comprehensive community engagement initiative called "On the Move" around the state, including in the St. Louis metropolitan planning area. MoDOT used three primary mechanisms to engage citizens, stakeholders and policymakers regarding the future of the state's transportation system. Those mechanisms included a Mobile Tour, Listening Sessions and virtual forums. In St. Louis, MoDOT conducted three listening sessions and 40 mobile tour stops, and received 2,400+ survey responses and 600+ project specific comments.</p> <p>Based on input received in St. Louis and across the state, four goal areas were established in Missouri's Statewide Transportation Plan: 1) take care of the transportation system and services we enjoy today; 2) keep all travelers safe, no matter the mode of transportation; 3) invest in projects that spur economic growth and create jobs; and 4) give Missourians better transportation choices. These four goals are in alignment with the ten principles established in EWGCOG's RTP 2040. EWGCOG's RTP2040 is also referenced in Appendix K of the Statewide Long Range Transportation Plan.</p> <p>IMPLEMENTED</p>

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.	EWGCOG & IDOT	The FHWA Illinois Division and IDOT have worked together to develop a new process to better capture AC actions in the IDOT STIP and the EWGCOG TIP. The IDOT developed an automated system that notifies the FHWA and the EWGCOG when an AC or AC conversion action is taken on an IDOT sponsored project. Upon receiving the notifications, the EWGCOG processes an administrative modification to the TIP.  IMPLEMENTED
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.	ONE DOT, EWGCOG & MoDOT	ONE DOT/MoDOT completed the work effort to update the FHWA/FTA/MoDOT Planning Partnership Agreement on 6/15/15. This work product culminated a successful collaborative Federal/State/Local agency work effort to update how FHWA, FTA, MoDOT and MPOs will partner together when developing statewide and metropolitan planning work products and processes in the State of Missouri and as part of the FAHP. Though the EWGCOG and other MPOs are not a signature party, each was given an opportunity to review and comment on the updated preliminary draft. All MPO comments and questions were considered by HWA/FTA/MoDOT and a response was provided to each comment and question.  IMPLEMENTED
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.	EWGCOG & MoDOT	The EWGCOG completed a comprehensive update of the Intelligent Transportation System (ITS) Architecture for the St. Louis Metropolitan Region in July 2015. The Executive Summary developed as part of this work effort, produced seven ITS goals established by the ITS Steering Committee.  IMPLEMENTED
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.	EWGCOG	A new PIP was approved by the EWGCOG Board of Directors on 4/30/14. The new PIP reflects current EWGCOG outreach processes and new opportunities and strategies to reach various EWGCOG constituencies. The EWGCOG has elected to maintain the work product title of Public Involvement Plan.  IMPLEMENTED

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.	EWGCOG & IDOT	<p>EWGCOG has maintained an ongoing work effort to partner with IDOT to develop the County Level Highway Safety Improvement Plans. IDOT has completed draft plans for each county and, at the request of EWGCOG, conducted meetings with each county engineer to discuss plans created for their counties and what the next steps should be. The EWGCOG TIP project development and selection process will award points to sponsors who use countermeasures listed in the draft County Level Highway Safety Improvement Plans.</p> <p>IMPLEMENTED</p>
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## APPENDIX C – PUBLIC COMMENTS

February 19, 2017

My name is Connor O'Shay. I attended the East-West Gateway public forum a few weeks ago and pitched my idea to the board regarding the Emergency Alert System. My exposition is explained in the body below. 

Everyday there are increasing reports coming to the surface about both isolated (Corpus Christi) and systemic (Flint, MI & Mississippi) water contamination in our public sources. I propose creating a broadcast signal of sorts much like the National Weather Service Emergency Broadcast Signal in which ALL citizens can be informed if there is EVER such faults in our city's water supply, be it infrastructure malfunction or natural disaster. There would be 2 ways to deliver this message. 1) AMBER ALERT like SMS AND (AND I CANNOT EXPRESS 'AND' ENOUGH) 2) Emergency Radio Broadcast Signal.

While I may have laid out before you a rough sketch of my philanthropic goal, I would ask to arrange a time to possibly meet in person to further flesh out my idea the project.

Let's make a difference this year!

Thank you again!

In earnest solidarity,

☘Connor O'Shay☘

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Gwen Moore, a local citizen also attended the public meeting. She voiced her concerns over the disparities of MODOT's urban and rural allocation of resources. Ms. Moore noted many Environmental Justice issues and gave the review team a copy of a Title VI complaint she filed with the US DOT. A copy of that complaint is in the following section. Ms. Moore commende

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Danny Jendusa attended and asked for information on how EWGCOG engages residents in the eight county planning area. Mr. Jendusa asked EWGCOG staff on their specific methods of public involvement.

## APPENDIX D - LIST OF ACRONYMS

**ADA:** Americans with Disabilities Act  
**AMPO:** Association of Metropolitan Planning Organizations  
**CAA:** Clean Air Act  
**CFR:** Code of Federal Regulations  
**CMP:** Congestion Management Process  
**CO:** Carbon Monoxide  
**DOT:** Department of Transportation  
**EJ:** Environmental Justice  
**FAST:** Fixing America's Surface Transportation Act  
**FHWA:** Federal Highway Administration  
**FTA:** Federal Transit Administration  
**FY:** Fiscal Year  
**HSIP:** Highway Safety Improvement Program  
**HUD:** Housing and Urban Development  
**ITS:** Intelligent Transportation Systems  
**LEP:** Limited-English-Proficiency  
**M&O:** Management and Operations  
**MAP-21:** Moving Ahead for Progress in the 21<sup>st</sup> Century  
**MPA:** Metropolitan Planning Area  
**MPO:** Metropolitan Planning Organization  
**MTP:** Metropolitan Transportation Plan  
**NAAQS:** National Ambient Air Quality Standards  
**NO<sub>2</sub>:** Nitrogen Dioxide  
**O<sub>3</sub>:** Ozone  
**PM<sub>10</sub> and PM<sub>2.5</sub>:** Particulate Matter  
**SHSP:** Strategic Highway Safety Plan  
**STIP:** State Transportation Improvement Program  
**TDM:** Travel Demand Management  
**TIP:** Transportation Improvement Program  
**TMA:** Transportation Management Area  
**U.S.C.:** United States Code  
**UPWP:** Unified Planning Work Program  
**USDOT:** United States Department of Transportation

## Appendix E – SITE VISIT DOCUMENTS

FY 2017 FHWA/FTA CERTIFICATION REVIEW

ST. LOUIS METROPOLITAN AREA PLANNING PROCESS

JANUARY 24-26, 2017

ON SITE REVIEW PLAN

### **TUESDAY, JANUARY 24, 2017**

Morning (EWGCOG Offices):

9:00 – 9:30 am - Introductions / Overview/Transportation Issues

9:30 – 10:00 am - Agreements & Contracts / MPO Administration

10:00 – 12:00 pm - AQ & Conformity Determination Process and attend meeting/ Intergovernmental Agency Group Meeting

12:00 – 1:00 pm- Lunch

1:00–1:30 pm – AQ & Conformity Determination Process

1:30 – 2:00 pm- TMA Planning Area Boundaries/Urban Boundaries/Functional Classification

2:00 –2:15 pm - Break

2:15 – 3:00 pm –.Planning Program Process/Work Products

3:00 – 4:30 pm – Continuation of Planning Program Process/Work Products

PUBLIC INVOLVEMENT SEGMENT EWG OFFICES

Start Time: 5:30 pm

End Time: 7:00 pm

### **WEDNESDAY, JANUARY 25, 2017**

Morning (EWGCOG Offices):

10:00–11:00 – Board of Directors Meeting at EWG

11:00 – 12:00 pm - Transit Planning and Ridership

12:00 – 1:00 pm – Lunch

Afternoon (EWGCOG Offices):

1:00 – 1:30 pm – Civil Rights/EJ/ADA

1:30 – 2:00 pm - ADA

2:00 – 2:30 pm - Public Involvement

2:30 -- 3:00pm - Land Use /Livability

3:00 – 3:15 pm – Break

3:15 – 4:30 - Freight Planning

**THURSDAY, JANUARY 26, 2017**

Morning (EWGCOG Offices):

8:30 – 9:00 am – Safety / Security Planning

9:00 – 10:00 am – Bicycle/Pedestrian Planning

10:00 – 10:15 am – Break

10:15– 12:00 am – Transportation Systems Management / CMP

12:00 – 1:00 pm – Lunch

Afternoon (EWGCOG Offices):

1:00 – 2:00 pm – Federal Review Team Meeting

2:00 – 3:00 pm – Closeout Meeting With EWGCOG Executive Director and Staff

FY 2017 FHWA/FTA CERTIFICATION REVIEW  
 ST. LOUIS METROPOLITAN AREA PLANNING PROCESS  
 JANUARY 24-26, 2017

Public Meeting Sign-in Sheet

January 24, 2017 (Tuesday)  
 5:30 - 7:00 PM  
 EWG Board of Directors Meeting Room

	Name	Agency	Telephone Number	E-mail Address
1.	Anna Cumiak	FTA HR	202-366-2888	anna.cumiak@dot.gov
2.	Mark Bechtel	FTA R7	816-329-3937	Mark.Bechtel@dot.gov
3.	Brad McMahon	FHWA	573-738-2605	bradley.mcmahan@dot.gov
4.	Enos Han	FHWA-MO	573-638-2625	enos.han@dot.gov
5.	Jim Wild	EWGCOG	314-421-4220	Jim.Wild@EWGATEWAY.ORG
6.	Mary Grace Lewandowski	EWG	314-421-4220	marygrace@ewgateway.org
7.	Carol Lawrence	EWG	314-421-4220	carol.lawrence@ewgateway.org
8.	Stacy Allen	MODNR-APCP	573-751-4817	stacy.allen@dnr.mo.gov
9.	LUBNA SHOAB	EWG	314-421-4220	LUBNA.SHOAB@EWGATEWAY.ORG
10.	Jerry Blair	EWG	"	jerry.blair@ewgateway.org
11.	Rodney Halbest	EWG	"	rodney.halbert@ewgateway.org
12.	Laura Ellen	MoDOT	314-275-1542	Laura.Ellen@modot.mo.gov
13.	Deni's BEGANVIC	MoDOT	314-706-0472	denis.beganvic@modot.mo.gov
14.	Jason Lange	EWG	314-421-4220	jason.lange@ewgateway.org
15.	Mike Henderson	MoDOT	573-522-6214	michael.henderson@modot.mo.gov
16.	Curtis Jones	IDOT	(618) 346-3134	curtis.jones@illinois.gov
17.	Kevin Jemison	IDOT	(618) 346-3149	Kevin.jemison@illinois.gov
18.	Chas Schmidt	IDOT	(217) 782-4134	Christopher.Schmidt@illinois.gov
19.	Holly Ostidick	IDOT	(217) 785-2994	Holly.Ostidick@illinois.gov
20.	Heather Hamilton	EPART	913-551-7039	hamilton.heather@eas.gov

FY 2017 FHWA/FTA CERTIFICATION REVIEW  
 ST. LOUIS METROPOLITAN AREA PLANNING PROCESS  
 JANUARY 24-26, 2017

Public Meeting Sign-in Sheet

January 24, 2017 (Tuesday)  
 5:30 – 7:00 PM  
 EWG Board of Directors Meeting Room

	Name	Agency	Telephone Number	E-mail Address
1.	Jon-Paul Kohler	FHWA-IL	(217) 492-4988	<del>jp.kohler@fhwa.gov</del> jon.paul.kohler@dot.gov
2.	JD STEVENSON	FHWA-IL	217-492-4638	jerry.stevenson@dot.gov
3.	Curtis Jones	IDOT	618-346-3134	curtjones@illinois.gov
4.	Kevin Jemison	IDOT	618-346-3149	kmjemison@illinois.gov
5.				
6.	Larry Graether			
7.				
8.				
9.				
10.				
11.				
12.				
13.				
14.				
15.				
16.				

21. VONTRBA GILES FHWA (217) 492-4628 vontra.giles@dot.ga
22. Betsy Tracy, FHWA -IL Division 217/492-4642 betsy.tracy@dot.ga
23. Jeremiah Shuler FTA -RT 816 329-3940 jeremiah.shuler@dot.ga
24. TRACY Beidleman (SPD)-Metro 314-982-1568 tbeidleman@bistatedev.org
25. John Posey EWG 314-421-4220 john.posey@ewgateway.org
26. PAUL HUBBMAN EWG. 314-421-4220 PAUL.HUBBMAN@EWGATEWAY.ORG
27. JIM MOLLET IDOT D-B LOCAL EPS 618-346-3330 JAMES.MOLLET@ILLINOIS.GOV
28. Peter Koepfel EWG 314-421-4220 peter@ewgateway.org
29. Larry Grither EWG 314-421-4220 Larry.grither@ewgateway.org

# ATTENDANCE LIST

Meeting: **Air Quality Advisory Committee**  
 Date: Tuesday, January 24, 2017, 2013  
 Time: 10:00 a.m.  
 Location: East-West Gateway Council of Governments, One Memorial Drive, St. Louis, Missouri

Name	Organization
1 <u>Carol Lawrence</u>	<u>EWGCOG</u>
2 <u>May Grace Lewandowski</u>	<u>EWG</u>
3 <u>Stacy Allen</u>	<u>DNR - APCP</u>
4 <u>Jeremy Rogus</u>	<u>St. Louis County DPH APCP</u>
5 <u>Tyson Lantz</u>	<u>EWG</u>
6 <u>Rodney Malbert</u>	<u>EWG</u>
7 <u>LUBNA SHARIF</u>	<u>EWG</u>
8 <u>Chris Schmitt</u>	<u>IDOT</u>
9 <u>KEVIN HERDLER</u>	<u>STLRCC</u>
10 <u>Andy Knott</u>	<u>Sierra Club</u>
11 <u>Mike Henderson</u>	<u>MODOT</u>
12 <u>Curtis Jones</u>	<u>IDOT ORAP</u>
13 <u>Kevin Jemison</u>	<u>IDOT, DS</u>
14 <u>Heather Hamilton</u>	<u>EPA-R7</u>
15 <u>VONTRA GILES</u>	<u>FHWA</u>
16 <u>Betsy Tracy</u>	<u>FHWA - IL Division</u>
17 <u>Jeremiah Shuler</u>	<u>FTA - R7</u>
18 <u>Anna Carmel</u>	<u>FTA HQ</u>
19 <u>Kelley Beline</u>	<u>Saint Louis Univ.</u>
20 <u>Tekiah Banks</u>	<u>Madison County Transit</u>

# ATTENDANCE LIST

Meeting: **Inter Agency Consultation Group**  
 Date: Tuesday, January 24, 2017, 2013  
 Time: 11:15 a.m.  
 Location: East-West Gateway Council of Governments, One Memorial Drive, St. Louis, Missouri

	<u>Name</u>	<u>Organization</u>
1	Mary Grace Lewandowski	EWG
2	Stacy Allen	DNR - APCP
3	LUBNA SHAAB	EWG
4	Rodney Halbert	EWG
5	Jeremy Rogers	St. Louis County - APCP
6	Chris Schmitt	IDOT
7	Holly Ostlick	IDOT - OPP
8	Enos Han	FHWA - MO
9	Brian McInchion	FHWA MO.
10	Mike Henderson	MoDOT
11	Kevin Jamison	IDOT
12	Curtis Jones	IDOT ORP
13	VONTRA GILES	FHWA
14	Betsy Tracy	FHWA - IL Division
15	Jason Lange	EWG
16	Heather Hamilt.	EPA RI
17	Carol Lawrence	EWG COG
18		
19		
20		

# ATTENDANCE LIST

Meeting: **Air Quality Advisory Committee**  
Date: Tuesday, January 24, 2017, 2013  
Time: 10:10 a.m.  
Location: East-West Gateway Council of Governments, One Memorial Drive, St. Louis, Missouri

	<u>Name</u>	<u>Organization</u>
21	<u>Morgan Hissom</u>	<u>Madison County Transit</u>
22	<u></u>	<u></u>
23	<u></u>	<u></u>
24	<u></u>	<u></u>
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26	<u></u>	<u></u>
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**Thank you for stopping by EWG , please sign up to receive emails!**  
**TUESDAY, JANUARY 24, 2017, 5:30PM-7:00PM**

**PUBLIC MEETING**



NAME/TITLE	ORGANIZATION/CITIZEN	EMAIL OR ADDRESS
Holly Ostlice	INDOT	Holly.Ostlice@illinois.gov
Mike Henderson	MoDOT	michael.henderson@modot.mo.gov
Kevin Jewison	IDOT	Kevin.jewison@illinois.gov
Steven Moore	CITIZEN	gwenmoore@charter.net
Danny Jendusa	Citizen	djendusa@gmail.com
Connor W Smith	Citizen	worskiptheking@icloud.com
Wesley Stephen	MoDOT	wesley.stephen@modot.mo.gov

FY2013 Federal Certification (St. Louis Metropolitan Planning Area)

Speaker Card

Public Meeting January 22, 2013

If you wish to make a comment during the meeting, please complete this card and provide it to the person at the sign-in desk. Knowing that you want to speak will allow us to better manage the time available during the meeting and will help assure that everyone has an opportunity for input. You may provide a written summary in the subject field if desired.

NAME: Cannon O'Shay <sup>worshipthedigitalage@gmail.com</sup> Twitter: @CelticKeeper

ADDRESS: 8334 Delcrest Drive St. Louis, MO 63124

AGENCY/GROUP: Citizen/Student STLCC Forest Park

SUBJECT: Possible proposal for new Metrolink (New Color)  
Line spanning from Grand Station,  
extending through Italian "Hill" area  
through Tower Grove & ending in Kirkwood  
Kansas City Native - Moved to STL in Sept 2015

FY2013 Federal Certification (St. Louis Metropolitan Planning Area)

Speaker Card

Public Meeting January 22, 2013

If you wish to make a comment during the meeting, please complete this card and provide it to the person at the sign-in desk. Knowing that you want to speak will allow us to better manage the time available during the meeting and will help assure that everyone has an opportunity for input. You may provide a written summary in the subject field if desired.

NAME: Danny Jendusa

ADDRESS: 5615 Delor Street

AGENCY/GROUP: citizen

SUBJECT: How does EW Gateway engage with residents in each of its 8 counties? What are the methods EW Gateway is using to get residents involved?

FY2013 Federal Certification (St. Louis Metropolitan Planning Area)

Speaker Card

Public Meeting January 22, 2013

If you wish to make a comment during the meeting, please complete this card and provide it to the person at the sign-in desk. Knowing that you want to speak will allow us to better manage the time available during the meeting and will help assure that everyone has an opportunity for input. You may provide a written summary in the subject field if desired.

NAME: Gwen Moore

ADDRESS: 7114 Willow Tree Lane

AGENCY/GROUP: Citizen

SUBJECT: Need stronger EWG reports than  
"Where We Stand"  
We need reports similar to those  
done for Ohio & Colorado.

**Gwen Moore**  
7114 Willow Tree Lane, St. Louis, Missouri 63130-1818

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January 24, 2017

Federal Highway Administration  
U.S. Department of Transportation  
Office of Civil Rights  
1200 New Jersey Avenue, SE  
8th Floor E81-105  
Washington, DC 20590  
Sent by eMail: CivilRights.FHWA@dot.gov

Dear Office of Civil Rights:

This is to lodge a Title VI Civil Rights complaint against the Missouri Department of Transportation, the Missouri Highways and Transportation Commission (collectively MoDOT), and portions of the MO Constitution Article IV, Sections 29-34. They all deny the benefits of Federal financed assistance based upon race, color, and national origin.

**75%+ of Protected Groups in Urban Areas:** In Missouri, the overwhelming majority of groups protected by Title VI live in just 11 of Missouri's 115 counties – the urban areas. Per the Census estimates of 2013, 81% of individuals who are not White alone, not Hispanic or Latino (race and color minorities) and 79% of foreign born individuals (national origin) lived in these 11 counties.<sup>1</sup> Also, 95% of Missouri Disadvantaged Business Enterprises are in these areas.<sup>2</sup>

**Predatory Urban Taxation:** Most transportation taxes here are paid in urban areas. In 2014, 84% of gas and vehicle taxable sales were urban. Note taxes are excluded on fuel used for rural agricultural purposes. Sales taxes are also excluded on the purchase of large trucks. Yet, the majority of transportation taxes are spent on local rural roads – unlike most states. This is the latest poll tax. Here, we pay the tax, but urban drivers receive little benefit.

**Highway Robbery - Economic Injustice:** Missouri is unusual in the disproportionate amount of transportation funds spent on rural roads. Compared to 49 states and nearby states, over 10 years, Missouri underfunded Urban Roads plus Mass Transit by \$2.5-3.2 trillion<sup>3</sup> respectively. In Missouri, urban taxpayers receive only 35¢ on their transportation tax dollar – even with expenditures on Interstates allocated based on a majority urban population. Rural taxpayers received \$4.31.<sup>4</sup> More than half of our drivers (52%) and our motor vehicles (53%) are in the 11 urban counties (10% of 115)<sup>5</sup>.

**Disparate Impacts and Harms:** For decades, MoDOT has discriminated by significantly underfunding urban areas unlike other states. In 2003, the Brookings Institute named us 'Urban Donors.' The distribution of the gas tax in Missouri "appears to penalize cities and urban areas. . . These areas contribute significantly more in tax receipts than they receive in allocations from their state's highway fund or through direct local transfers."<sup>6</sup> Excluding Interstates over 10 years, MoDOT spent 80% of funds in rural areas (\$9.9 of \$12.2 trillion<sup>5</sup>) which have only 36% of the traffic. This represents duplicate funding for rural roads. Per the 1950's MO Constitution, Article IV Sections 29-34, the majority of funds distributed to local governments are sent to rural governments – even though the primary source and the need for funds is urban.

**Zero Mass Transit:** Unlike many states, the pre-civil rights era MO Constitution Article IV, Sections 29-34 forbids the use of highway user taxes for uniquely urban needs like mass transit. That's why Kansas City has one of the least used mass transit systems for a city of its size in the nation. Illinois funds Metro Link millions more each year than Missouri does.

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<sup>1</sup> Source: [http://quickfacts.census.gov/qfd/download\\_data.html](http://quickfacts.census.gov/qfd/download_data.html)

<sup>2</sup> Missouri Regional Certification Committee List accessed 4/23/15

<sup>3</sup> Corrected from the original from billion to trillion

<sup>4</sup> Considers: MoDOT 10-Year Capital & Maintenance Expenditures (FHWA SF-12); and FY14 Transfers to Local Governments from MO DOR Highway User Revenues

<sup>5</sup> Department of Revenue 2013, "Total Motor Vehicle License Plates by Type by County," and "Total Drivers by Age within County"

<sup>6</sup> Brookings Institution Series on Transportation Reform, Fueling Transportation Finance: A Primer on the Gas Tax, 2003.

**Disproportionate Rural Miles:** At 34,000 miles, MoDOT has the 7th largest highway system in the nation. Yet Missouri is 18th in population, 18th in land area, and 18th in revenues for highways. To be 18th in state highway miles, MoDOT would have only 12,000 miles. So, why does MoDOT have almost triple the highway miles for state size and funding? Probably for political reasons, MoDOT took over virtually all (98%) of the lightly traveled rural collectors – DOUBLE the percent of other states. This represents 65% of MoDOT road miles and 45% of bridges. MoDOT only owns 19% of urban collectors. MoDOT also has 6,900 miles (20% of their total) of local rural roads that are not Federally Funded. Expensive! Most states have less than 100 miles of these very local roads. This is another example of a prejudicial preference for rural over urban areas. Yet, MoDOT's taking responsibility for an unusually large amount of rural roads harms both urban and rural drivers (*Reductio ad absurdum*, Latin: "reduction to absurdity"). MoDOT simply cannot afford 3 times the responsibility that they are funded for – not counting the 20% without Federal Funding at FIVE TIMES the cost.

**Urban Roads Worse Condition:** Virtually all of the Interstates and Rural Roads on the NHS are in good or acceptable condition (both 98%) in terms of pavement roughness. Yet, a quarter of NHS Urban Highways are not in good or acceptable condition (FHWA Table 2012 HM-47A). Fatal highway crashes (2012 FHWA Table FI-10) are also overwhelmingly urban (75%). Studies show that about a third of road crashes are due to road conditions.

**MoDOT's Bridge Construction Not Based on Use or Need:** Over 10 years to 2014, more than two-thirds (69%) of the bridges that MoDOT built or reconstructed were local rural bridges which had only 17% of the traffic<sup>7</sup>. The majority of the travel was on the interstates (76%) which represented only 21% of the bridge area which MoDOT built or reconstructed. As of 2014, 75% of MoDOT's NHS bridges by area in need of repair were busy urban bridges. MoDOT delayed the building of the Stan Musial Bridge for years. They wanted to make it a toll bridge. Eventually, IDOT and St. Louis Congressmen prevented this exploitation. Remember: the first Stimulus project in the nation? It was MoDOT's \$9 million bridge to save 38 families in Tuscumbia a 20 minute trip. Attempts to obtain equitable distribution of American Recovery and Reinvestment Act (ARRA) fell on deaf ears.<sup>8</sup> Each 10 year analysis includes ARRA, and reveals urban underfunding.

Of the bridges which MoDOT maintains, just 6 counties out of 115 carried more than half (60%) of state-wide traffic. As of 2013, these heavily traveled bridges had more than half of the Deficient bridges by area in the state. In fact, more than one-third of the bridge area in these few counties was Deficient. Rural drivers are also worried. MoDOT reports that rural drivers are often confused about county vs. state roads and bridges.

**Economic Harms:** The DOT RITA calculates that traffic congestion costs drivers in St. Louis \$1,116 million each year and in Kansas City \$640 million.<sup>9</sup> Also, studies show that urban drivers pay for added repairs, gas and other costs due to our deficient roads. The estimated monthly costs: St. Louis at \$125; Kansas City at \$111; Jefferson City at \$110; Springfield at \$95.<sup>10</sup> This discrimination is economic.

Underfunding the St. Louis and Kansas City areas also harms DBE contracting. The DOJ's investigation noted MoDOT's underuse of DBE firms. Virtually all (95%) of DBE contractors are located in St. Louis and Kansas City. Prime contractors noted, "it is more challenging to meet goals outside the Kansas City and St. Louis areas" MoDOT's NERA 2012 Disparity Study. Investments in principal cities will help stimulate the overall economy of Missouri.

The DOJ report noted "City officials from Ferguson and surrounding communities have called substandard public transportation options."<sup>11</sup> Forward Through Ferguson noted a need for enhancing access to transit.

**Environmental Harms:** Missouri's ban on mass transit funding from highway user taxes harms our environment. There are several Pollution Non-Attainment Areas in Missouri which relate to auto and truck use. They include the urban areas of St. Louis City, St. Louis County, Kansas City, St. Charles County, Jackson County, Jefferson County, and Farmington. These cities are generally non-attainment areas for ozone, sulfur dioxide, lead and particulate matter pollution.

**Emotiona Harms:** Simply not feeling safe on Missouri roads and bridges should not be underestimated. Both urban and rural citizens I've discussed this with often volunteer that they are aware of the status of our bridges. Many report that they say a prayer when on or under a Missouri bridge. Most saw the March 2014 video of chunks of concrete falling on a truck traveling under an I-55 bridge in St. Louis County.<sup>11</sup> Also, MoDOT was the only DOT in the nation to actually install an Adopt-A-Highway sign for the Knights of the Ku Klux Klan.

<sup>7</sup> Source: Federal Highway Administration National Bridge Inventory MO14

<sup>8</sup> <https://www.youtube.com/watch?v=QYj7H4RHAXQ>

<sup>9</sup> Source: DOT RITA Table 5-5: Highway Congestion in the 50 Largest Urban Areas: 2011

<sup>10</sup> "Missouri Transportation by the Numbers," TRIP, April 2015

<sup>11</sup> <http://www.kmov.com/news/local/Chunks-of-concrete-fall-on-truck-traveling-under-I-55-in-South-County-248939931.html>

**What We Hope You Will Require**

**Economic Justice with Missouri Transportation Guarantee Program (MTGP):** In line with the TEA-21 Minimum Guarantee Program, require an equitable 90.5% guaranteed rate of return of all highway user taxes contributed by each county and municipality. MTGP would include all funds expended by MoDOT and funds distributed directly to local governments. Limit expenditures on Interstates generously to 33% of all of MoDOT expenditures and be excluded from this MTGP. Permit highway user taxes to be used on urban transportation: for mass transit, elderly and handicapped transportation, bicycle and pedestrian improvements, as well as for roads, bridges and congestion mitigation.

**Performance Audits:** Require the Missouri Public Service Commission (MPSC) to perform annual financial and engineering performance audits of the MTGP to determine if MoDOT is achieving its goals and objectives. The MPSC would hire engineering performance audits of MoDOT projects to verify that both expenditures and actual results are efficient and effective. The MPSC to complete annual financial performance audits based on Generally Accepted Government Auditing Standards and Federal Highway Administration (FHWA) guidelines. All MPSC audits to be funded by highway user taxes limited to actual expenditures with a maximum of 3% of taxes. Naturally, FHWA must have ongoing hands-on oversight of Missouri and MoDOT.

Good stewardship by a reasonable person would expect transportation investments to relate to the population – where people live, pay taxes, and **where people actually travel**. Missourians need **immediate federal help** to protect our civil rights, correct these longstanding injustices and to prevent future ones. MoDOT reports that they will simply close unsafe bridges on/over urban NHS roads rather than use federal construction funds on them. This hurts us all - rural and urban. This discrimination harms all Missourian's economy, environment, and especially our safety.

Sincerely,



Gwen Moore  
gwenmoore@charter.net  
(314) 874-0711  
7114 Willow Tree Lane  
St. Louis, MO 63130-1818

Enclosures: FHWA External Discrimination Complaint Form  
"Back of the Bus: How Missouri's Spending on Transportation Penalizes Cities and Suburbs"

<sup>i</sup> Investigation of the Ferguson Police Department, United States Department of Justice Civil Rights Division, March 4, 2015

**External Discrimination Complaint Form  
(Title VI/Nondiscrimination and ADA/Section 504 Complaints)**

<b>Name</b> Gwen Moore	<b>Phone</b> (314) 874-0711	<b>Name of Person(s) That Discriminated Against You</b> Missouri Department of Transportation, the Missouri Highways and Transportation Commission, and the State of Missouri
<b>Address</b> 7114 Willow Tree Lane		<b>Location and Position of Person (If Known)</b> Patrick McKenna, Director Missouri Department of Transportation, Central Office 105 W. Capitol Avenue Jefferson City, MO 65102  Gregg C. Smith, Chair Missouri Highways and Transportation Commission P.O. Box 270 Jefferson City, Missouri 65102  Josh Hawley, Attorney General Missouri Attorney General's Office Supreme Court Building 207 W. High St. P.O. Box 899 Jefferson City, MO 65102
<b>City, State, Zip</b> St. Louis, MO 63130		<b>City, State, Zip</b> See above
<b>Discrimination Because of:</b> <input checked="" type="checkbox"/> Race <input checked="" type="checkbox"/> Color <input checked="" type="checkbox"/> National Origin <input type="checkbox"/> Sex <input type="checkbox"/> Age <input type="checkbox"/> Disability <input type="checkbox"/> Retaliation		<b>Date of Alleged Incident</b> Discrimination has been the case for decades. But the most recent was December 6, 2016 when the Commission voted for portions of the Statewide Transportation Improvement Program. Discriminatory transfers of funds to local government by the State of Missouri are ongoing. But the most recent transfer was reported on January 12, 2017.
<b>Explain As Briefly And Clearly As Possible What Happened And How You Were Discriminated Against. Indicate Who Was Involved. Be Sure To Include How Other Persons Were Treated Differently Than You. Also Attach Any Written Material Pertaining To Your Case.</b>  Please see the enclosed cover letter and report, "Back of the Bus."  This complaint is filed via email from <a href="mailto:gwenmoore@charter.net">gwenmoore@charter.net</a> to <a href="mailto:CivilRights.FHWA@dot.gov">CivilRights.FHWA@dot.gov</a>		
<b>Signature</b> 		<b>Date</b> January 24, 2017

## Back of the Bus: How Missouri's Spending on Transportation Penalizes Cities and Suburbs

by the Missouri Coalition for Better Transportation, [contactus@mocbt.org](mailto:contactus@mocbt.org)

### Executive Summary

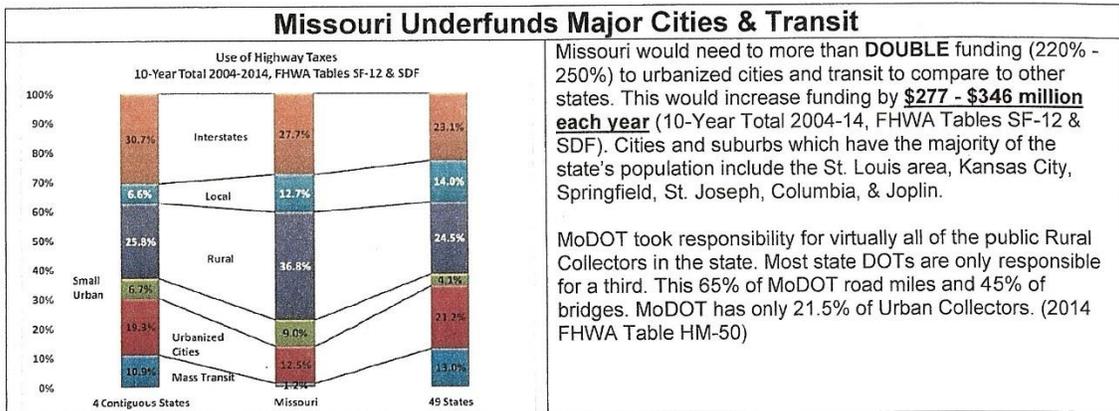
This is support for a Title VI Civil Rights complaint with the Federal Highway Administration Office of Civil Rights against Missouri Department of Transportation, Missouri Highways and Transportation Commission (collectively MoDOT) and portions of MO Constitution Article IV, including but not limited to Sections 29-34.

For half a century, long past the civil rights era, transportation in Missouri has discriminated against people living in urban areas – where the overwhelming majority of protected groups live. Missouri state transportation dollars flow to localities on the basis of neither tax paid nor need. The result in Missouri is a spatially skewed pattern of state transportation spending that is essentially anti-city and anti-suburb.

**Title VI states:** "No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance." Missouri transportation is, has been and will continue to be in breach of federal Title VI without intervention of the Federal Highway Administration (FHWA).

### Missouri Transportation Disparate Impacts

**Brookings Institution, 'Urban Donors':** "The distribution of the gas tax within [Missouri] appears to penalize cities and urban areas...urban areas act as "donor regions"... These areas contribute significantly more in tax receipts than they receive in allocations from their state's highway fund or through direct local transfers."<sup>i</sup> For decades, Missouri has deprived cities and suburbs of their fair share of transportation funds – unlike other states. This is a disparate impact.



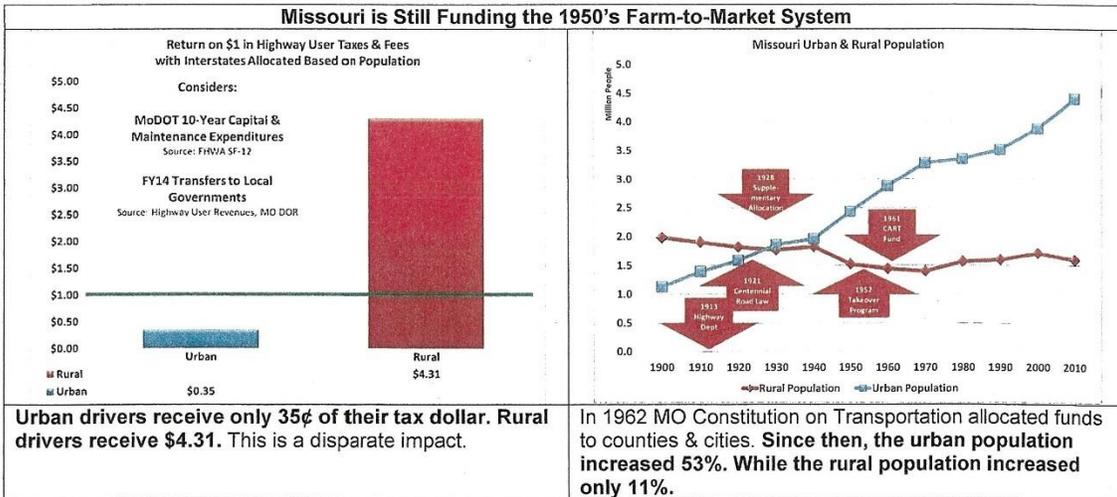
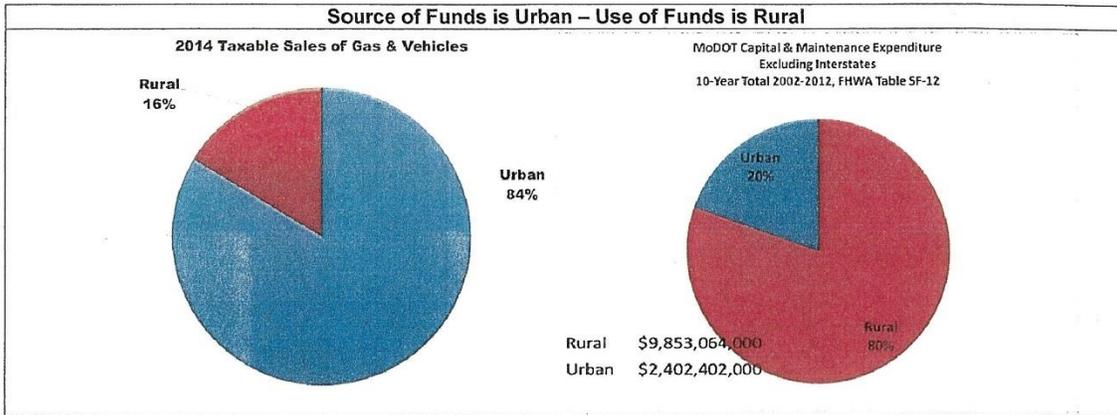
**Most Protected Groups live in Urban Areas:** In Missouri, the overwhelming majority of groups protected by Title VI live in just 11 of Missouri's 115 counties – the urban areas. Per U.S. Census estimates of 2013, 81% of individuals who are not White alone (race and color minorities) and 79% of foreign born individuals (national origin) live in these 11 counties.<sup>ii</sup> Also, 95% of Missouri Disadvantaged Business Enterprises (DBE) are in urban areas.<sup>iii</sup>

**Ferguson needs Transit:** The DOJ report noted "City officials from Ferguson and surrounding communities have called substandard public transportation options."<sup>iv</sup> Forward Through Ferguson noted a need for enhancing access to transit. "For many Americans, mobility can make all the difference in their ability to meet basic needs, participate fully in community life, and connect and contribute to our national economy." Research by the Brookings Institution notes: "While St. Louis ranks 19th in the country in terms of population compared to other U.S. cities, it ranks only 68th in terms of transit coverage and access to jobs by transit."<sup>v</sup> Thus many minorities cannot reach health care, jobs or education. Unlike

many states, the Missouri Constitution is **interpreted** to only permit driver taxes to fund roads and bridges. This is a disparate impact.

**Another DOJ report** failed address the core issue of underinvestment in urban roads and bridges. The DOJ cited MoDOT's under-utilization of DBE firms. MoDOT's 2012 Disparity Study noted, "Most prime contractors reported that while it was often difficult and burdensome, they were able to meet DBE contract goals, although it is more challenging to meet goals outside the Kansas City and St. Louis areas."<sup>vii</sup> Underfunding of urban areas by both MoDOT and the MO Constitution harms DBE contracting. This is a disparate impact.

**Predatory Urban Taxation:** The majority of MO transportation taxes are paid in urban areas. In 2014, 84% of gas and vehicle taxable sales were from urban areas. Note, taxes are excluded on fuel used for rural agricultural purposes.<sup>viii</sup> Sales taxes are also excluded on the purchase of large trucks.<sup>ix</sup> Yet over 10 years, MoDOT spent only 12.5% on urbanized roads and bridges compared to 21.2% by the other 49 DOT's (10-Year Total 2004-14, FHWA Tables SF-12 & SDF). The majority of transportation taxes are spent by MoDOT on local rural roads – unlike most states. Here, urban drivers pay the majority of the tax, but urban drivers receive little benefit.<sup>x</sup> This is a disparate impact.



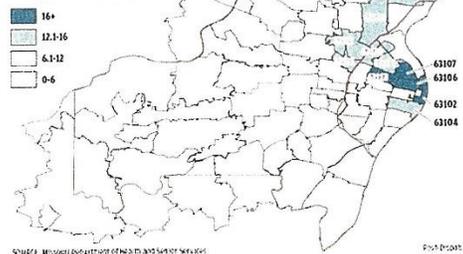
**Highway Robbery = Economic Injustice:** Missouri is unusual in the disproportionate amount of transportation funds spent on rural roads. **Compared to 49 states and nearby states, over 10 years, Missouri underfunded Urban Roads plus Mass Transit by \$2.5-3.2 trillion<sup>x</sup>. In Missouri, urban taxpayers receive only 35¢ on their transportation tax dollar. Rural taxpayers received \$4.31.<sup>xi</sup>** More than half of our drivers (52%) and our motor vehicles (53%) are in the 11 urban counties (10% of 115 total counties in MO)<sup>xii</sup>. This is a disparate impact.

**Disproportionate Rural Miles:** At 33,892 miles, MoDOT has the 7th largest highway system in the nation.<sup>xiii</sup> Yet Missouri is 18th in population, 18th in land area<sup>xiv</sup>, and MoDOT is 13th in State Highway Agency revenues for state highways<sup>xv</sup>. To be 18th in state highway miles, MoDOT would have only 12,116 miles.<sup>xvi</sup> So, why does MoDOT have almost triple the highway miles for state size and funding? MoDOT is responsible for virtually all (98%) of the lightly traveled rural collectors – TRIPPLE the percent of other states. This represents 65% of MoDOT road miles and 45% of bridges. MoDOT only owns 21% of urban collectors. MoDOT also has 6,869 miles (20% of their total) of rural roads which are not Federally Funded.<sup>xvii</sup> Expensive! Without Federal Funding it costs FIVE TIMES funded roads. Most states are responsible for less than 200 miles of these very local roads.<sup>xviii</sup> This is another example of a prejudicial preference for rural over urban areas. MoDOT simply cannot afford almost 3 times the responsibility that they are funded for – especially with the rural miles. This is a disparate impact.

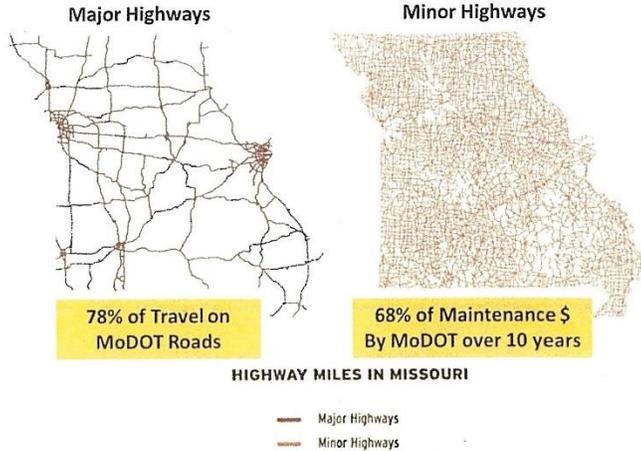
**Disparate Impacts and Harms:** For decades, MoDOT has discriminated by significantly underfunding urban areas unlike other states. Excluding Interstates, over 10 years MoDOT spent 80% of funds in rural areas (\$9.9 of \$12.2 trillion) which have only 36% of the traffic.<sup>xix</sup> Overall, 70% of the MO population is urban, with 30% rural<sup>xx</sup>. This is a disparate impact.

**Zero Mass Transit:** Unlike many states, the archaic MO Constitution Article IV, Sections 29-34 seem to forbid the use of highway user taxes for uniquely urban needs like mass transit. Thus, Kansas City & Springfield's transit systems have the smallest ridership for cities of their size in the nation. Illinois funds the St. Louis Bi-State Transit Agency \$116 per person in the counties served<sup>xxi</sup>. Missouri only provided \$0.65 per person from general revenue.<sup>xxii</sup> On average, states use 11.8% of driver taxes to fund transit.<sup>xxiii</sup> Colorado recognized that transit in fact helped roads by reducing traffic. "Colorado Senate Bill 48, ... allows \$250 million — the share of statewide gas tax revenues that is directed to local communities each year — to be spent on transit, biking, and walking."<sup>xxiv</sup> Like St. Louis city some cities have very high daytime population increase due to commuting in the state — with inadequate transit<sup>xxv</sup>. St. Louis City's daytime population creases 36%. St. Louis City also has a very high minority population<sup>xxvi</sup>. This is a disparate impact.

**INFANT MORTALITY RATES BY ZIP CODE**  
The shaded areas have rates that exceed the national 2012 average of 6.0 - in some cases by more than twice the average.  
Rate per 1,000 live births



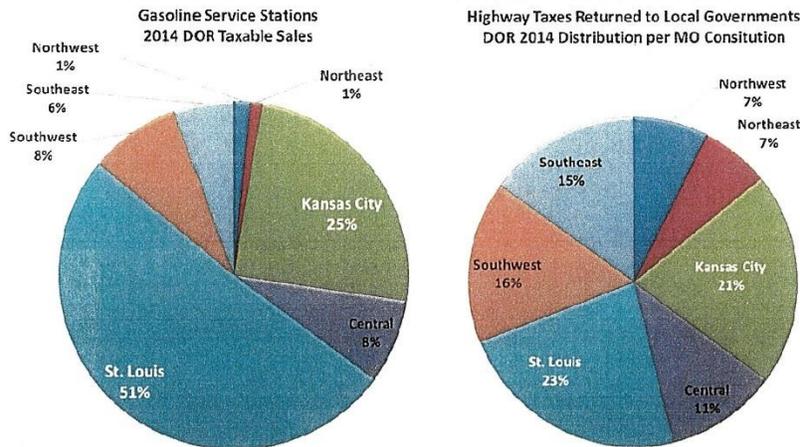
some [St. Louis] neighborhoods, the infant mortality rates exceed that of Third World countries...<sup>xxvii</sup> "In Kansas City... Poor expectant mothers cannot travel to clinics without good transit. In the economically depressed and largely black north side St. Louis city and county more than 100 African American babies die each year."<sup>xxix</sup> This is a serious disparate impact.



**HIGHWAY MILES IN MISSOURI**

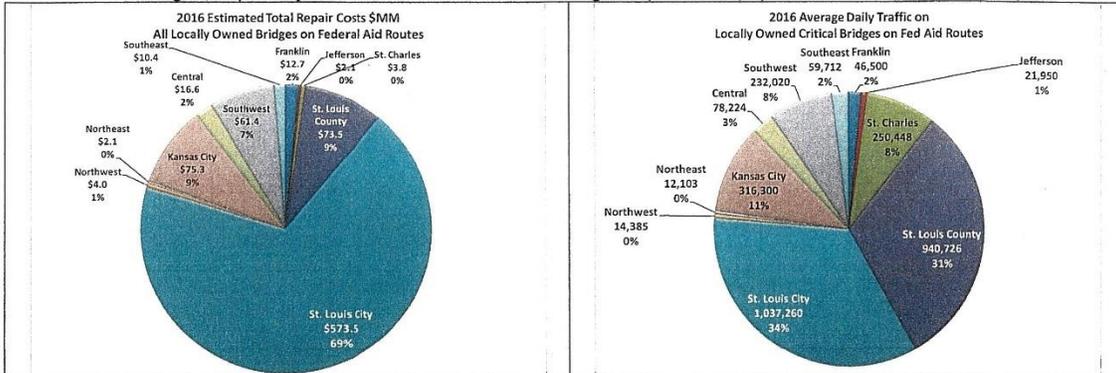
**MoDOT's Bridge Construction Not Based on Use or Need:** In recent years, more than two-thirds (68%) of the Total Project Cost of bridges that MoDOT built or reconstructed were local rural bridges which had only 17% of the traffic. The majority of the travel was on the interstates (76%) which represented only 23% of the costs of bridges which MoDOT built or reconstructed. Urban bridges which MoDOT repaired or reconstructed received only 9% of Total Project Costs. Yet, as of 2014, the Average Daily Traffic on MoDOT bridges still requiring substantial repair or replacement were: 42% urban (the most), 37% interstate, with only 21% rural.<sup>xxx</sup> MoDOT delayed the building of the Stan Musial Bridge at St. Louis for several years. They wanted to make it a toll bridge. Eventually, IDOT and St. Louis Congressmen prevented this exploitation. Remember: the first Stimulus project in the nation? It was MoDOT's \$9 million bridge to save 38 families in Tusculumbia a 20 minute trip. Attempts to obtain equitable distribution of the American Recovery and Reinvestment Act (ARRA) fell on deaf ears.<sup>xxxi</sup> This demonstrates the disparate allocation of driver taxes – and jobs.

**Disparate Distribution of Funds to Local Governments:** Based on the archaic MO Constitution Article IV, Sections 29-34, the majority of funds are sent to rural areas – even though the primary source and the need is urban. Per the constitution, unincorporated urban areas are not counted in city populations. In the five county St. Louis District, 26% of the population lives in unincorporated areas and are not even counted.<sup>xxxi</sup>



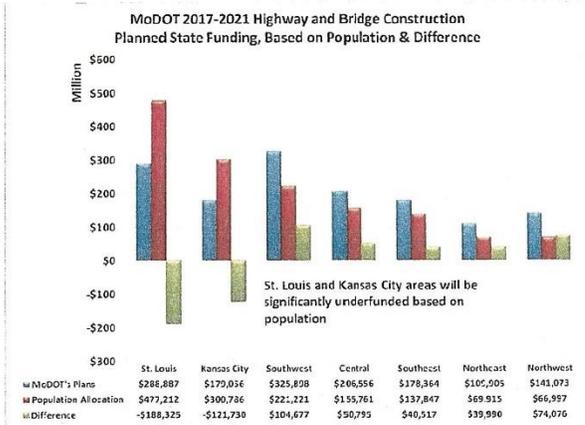
From 2015 to 2016, the repair costs and number of **critical bridges owned by the City of St. Louis DOUBLED**. Bridge repair costs needed by the City of St. Louis are more than all of the other areas in the state. Due to decades of low tax transfers, the City of St. Louis is responsible for critical bridges which qualify for more federal funding than the rest of the state combined.<sup>xxxiii</sup> St. Louis city and county have most of the minority population in the state.<sup>xxxiv</sup> We cannot continue this way. This is a disparate impact.

Heavy traffic and inadequate amounts returned to urban local governments result in substantial traffic on locally owned urban critical bridges, especially in the St. Louis area with the highest protected population. This is disparate impact.



**Economic Harms:** Driving on deficient roads costs urban drivers as much as \$1,511 per year in the form of extra vehicle operating costs as a result of driving on roads in need of repair, lost time and fuel due to congestion-related delays, and the cost of traffic crashes in which roadway features likely were a contributing factor. The estimated monthly costs: St. Louis at \$125; Kansas City at \$111; Jefferson City at \$110; Springfield at \$95.<sup>xxxv</sup> This is a disparate impact.

**Environmental Harms:** Missouri's ban on mass transit funding from driver taxes harms our environment. Pollution Nonattainment Areas in Missouri which relate to auto and truck use are: the City of St. Louis, St. Louis County, Kansas City, St. Charles County, Jackson County, Jefferson County, and Farmington. These cities are generally non-attainment areas for ozone, sulfur dioxide, lead and particulate matter pollution.<sup>xxxvi</sup> This is a disparate impact.



**The Discrimination Continues:** MoDOT's 2017-2021 highways and bridge construction plan will continue the underfunding of urban areas. Based on the percent of population, MoDOT's St. Louis District will be underfunded by \$188 million over the next five years. The Kansas City District will be underfunded by \$122 million.<sup>xxxvii</sup> This will continue disparate impacts.

**FHWA - What We HOPE You'll Do**

**One, End Disparate Funding:** In line with the federal Transportation Equity Act for the 21st Century Minimum Guarantee Program, require an equitable 90.5% guaranteed rate of return of all highway user taxes contributed by each county and municipality - excluding amounts spent on interstates. This would include all funds expended by MoDOT and funds distributed directly to local governments. Ensure that the funds distributed to local governments of St. Louis city, Cole, Greene, Taney, St. Louis and Jackson counties recognize the history of disparate impacts, and the fact that these areas have a substantially higher daytime population from commuters than the resident population or taxes paid might indicate. Permit highway user taxes and fees to be used for all federally funded forms of transportation: mass transit, elderly and handicapped transportation, bicycle and pedestrian improvements, as well as for roads and bridges. After all, the use of other forms of transportation will reduce the use of roads and bridges. FHWA please require local control of all expenditures. MoDOT has not demonstrated any awareness of urban needs. For example, MoDOT does not use updated standards developed by the National Association of City Transportation Officials (NACTO), Urban Street Design Guide. FHWA must end these disparate impacts.

**Two, Return excessive rural roads to rural counties:** MoDOT's unusually large responsibility for rural roads and bridges is a disservice to both rural and urban drivers. While this clearly has resulted in disparate impacts to protected groups, MoDOT's inability to maintain such a large system harms all citizens – both rural and urban. Under Missouri law, rural roads which would be county roads in other states cannot be returned to the county without additional funding. FHWA must limit MoDOT's responsibility for rural roads which receive no federal aid to one mile per county – much closer to other states. Also, FHWA must limit MoDOT's responsibility for Rural Other Federal-Aid Highways to 5,000 miles. All of this will bring MoDOT's responsibilities far closer to 18<sup>th</sup> in the nation as appropriate for a state of this size. It also would bring the distribution of rural and urban miles much more in line with the national average.<sup>xxxviii</sup>

Road Miles	2014 MoDOT	Proposed	49 States 2014 DOTs	% of Total 2014 MoDOT	% of Total Proposed	% of Total 49 States 2014 DOTs
Rural NHS	3,820	3,820	123,726	11.3%	31.7%	16.5%
Rural Other Federal-Aid Highways	20,072	5,000	282,867	59.2%	41.4%	37.8%
Rural Non-Federal-Aid Highways	6,869	114	177,390	20.3%	0.9%	23.7%
Sub-Total Rural	30,761	8,934	583,982	90.8%	74.0%	78.0%
Urban NHS	1,690	1,690	72,918	5.0%	14.0%	9.7%
Urban Other Federal-Aid Highways	1,121	1,121	61,041	3.3%	9.3%	8.2%
Urban Non-Federal-Aid Highways	321	321	30,969	0.9%	2.7%	4.1%
Sub-Total Urban	3,132	3,132	164,928	9.2%	26.0%	22.0%
Total	33,892	12,066	748,911	100.0%	100.0%	100.0%

Bringing MoDOT's road miles in line with revenues, will allow MoDOT to properly serve both rural and urban citizens. Returning most rural roads to counties would increase local control. FHWA must end these disparate impacts.

**Three, Require Ongoing Performance Audits:** Both urban and rural Missourians distrust MoDOT. Rural areas complain of being ignored. Many rural residents fear for their safety as they and their children cross crumbling bridges. We ask the FHWA to require the Missouri Public Service Commission (MPSC) to perform annual performance audits of MoDOT to determine if it is achieving its goals and objectives. These audits must be based on Generally Accepted Government Auditing Standards and Federal Highway Administration (FHWA) guidelines. The MPSC must also hire engineering performance audits of MoDOT projects to verify that both expenditures and actual results are efficient and effective. All MPSC audits to be funded by highway user taxes limited to actual expenditures with a maximum of 3% of taxes. Naturally, FHWA must have ongoing hands-on oversight of Missouri transportation. FHWA must end these disparate impacts.

Good stewardship by a reasonable person would expect transportation investments to relate to the population – where people live, pay taxes, and **where people actually travel**. All Missourians need **immediate federal help** to protect our civil rights, correct longstanding injustices and to prevent future ones. Unsound transportation practices hurt our economy, environment, and especially our safety – for everyone.

**References:**

- <sup>i</sup> Brookings Institution Series on Transportation Reform, Fueling Transportation Finance: A Primer on the Gas Tax, 2003.
- <sup>ii</sup> Source: [http://quickfacts.census.gov/qfd/download\\_data.html](http://quickfacts.census.gov/qfd/download_data.html)
- <sup>iii</sup> Missouri Regional Certification Committee List accessed 4/23/15
- <sup>iv</sup> Investigation of the Ferguson Police Department, United States Department of Justice Civil Rights Division, March 4, 2015
- <sup>v</sup> <http://forwardthroughferguson.org/report/call-to-action/enhancing-access-to-transportation/>
- <sup>vi</sup> The State of Minority- and Women-Owned Business Enterprise: Evidence from Missouri, NERA, Prepared for the Missouri Department of Transportation 2012 Disparity Study
- <sup>vii</sup> Taxable Sales <http://dor.mo.gov/publicreports/>
- <sup>viii</sup> <http://dor.mo.gov/business/sales/sales-use-exemptions.php>
- <sup>ix</sup> 10-Year 2002-2012 Total FHWA Tables SF-12 & SDF <https://www.fhwa.dot.gov/policyinformation/statistics.cfm>
- <sup>x</sup> Federal Highway Administration Table SF-12 <https://www.fhwa.dot.gov/policyinformation/statistics.cfm>
- <sup>xi</sup> MoDOT 10-Year Capital & Maintenance Expenditures (FHWA SF-12) <https://www.fhwa.dot.gov/policyinformation/statistics.cfm>; averaged plus FY14 County Aid Road Trust Fund Distribution <http://dor.mo.gov/publicreports/>
- <sup>xii</sup> Department of Revenue 2013, "Total Motor Vehicle License Plates by Type by County," and "Total Drivers by Age within County" <http://dor.mo.gov/publicreports/#dlrep>
- <sup>xiii</sup> 2002-2012, FHWA Table SF-12 & VM-2 <https://www.fhwa.dot.gov/policyinformation/statistics.cfm>
- <sup>xiv</sup> [http://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=DEC\\_10\\_SF1\\_P2&prodType=table](http://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=DEC_10_SF1_P2&prodType=table)
- <sup>xv</sup> Illinois Transportation Plan [http://www.illinoistransportationplan.org/pdfs/transportation\\_funding\\_090512\\_web.pdf](http://www.illinoistransportationplan.org/pdfs/transportation_funding_090512_web.pdf)
- <sup>xvi</sup> 2015 MO State Transit Assistance [https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=4&ved=0ahUKEwjp5tSpiZvMAhUFMSYKHbHCDeUQFggyMA&url=http%3A%2F%2Fwww.modot.org%2Fothertransportation%2Ftransit%2Fdocuments%2FFY15urbanandruralstatetransitWorksheetsforwebsite.pdf&usq=AFOqjCNHNzJL2LzBUtPs\\_m3zCH0LATps7lw&bvm=bv.119745492,d.eWE&cad=rja](https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=4&ved=0ahUKEwjp5tSpiZvMAhUFMSYKHbHCDeUQFggyMA&url=http%3A%2F%2Fwww.modot.org%2Fothertransportation%2Ftransit%2Fdocuments%2FFY15urbanandruralstatetransitWorksheetsforwebsite.pdf&usq=AFOqjCNHNzJL2LzBUtPs_m3zCH0LATps7lw&bvm=bv.119745492,d.eWE&cad=rja)
- <sup>xvii</sup> 2014 FHWA Table SDF <https://www.fhwa.dot.gov/policyinformation/statistics.cfm>
- <sup>xviii</sup> <http://usa.streetsblog.org/2013/04/25/in-colorado-a-big-legal-victory-for-active-transportation-funding/>
- <sup>xix</sup> County to County Commuting Flows for the United States and Puerto Rico: 2009-2013 <http://www.census.gov/hhes/commuting/>
- <sup>xx</sup> Missouri: 2010 Summary Population and Housing Characteristics <http://www.census.gov/prod/www/decennial.html>
- <sup>xxi</sup> <http://health.mo.gov/data/CommunityDataProfiles/>
- <sup>xxii</sup> "New initiative is targeting high infant mortality," St. Louis Post-Dispatch, October 15, 2015
- <sup>xxiii</sup> Infant Health Profile by race, county and state <http://health.mo.gov/data/CommunityDataProfiles/>, Number of Infant Deaths per 1,000, 2002-2012, averaged over 11 years. Infant Deaths: The total number of resident deaths to babies born alive and dying before their first birthday. Rate is per 1,000 live births during the noted eleven-year period.
- <sup>xxiv</sup> 2014 FHWA Table HM10 <https://www.fhwa.dot.gov/policyinformation/statistics.cfm>
- <sup>xxv</sup> <http://www.ipl.org/div/stateknow/popchart.html#statesbyland>
- <sup>xxvi</sup> 2014 FHWA Table SF-3 <https://www.fhwa.dot.gov/policyinformation/statistics.cfm>
- <sup>xxvii</sup> 2014 FHWA Table HM10 <https://www.fhwa.dot.gov/policyinformation/statistics.cfm>
- <sup>xxviii</sup> 2014 FHWA Table HM-14 & HM-50 <https://www.fhwa.dot.gov/policyinformation/statistics.cfm>
- Federal-Aid Highways - Defined in Title 23 CFR 470.101(5) defines the term "federal-aid highways" as public roads "other than a highway classified as a local road or rural minor collector." These DOT miles are detailed in HM-50.
- <sup>xxix</sup> Median of Non-Federal Aid Highways, 2014 FHWA Table HM-14 <https://www.fhwa.dot.gov/policyinformation/statistics.cfm>
- <sup>xxx</sup> Federal Highway Administration National Bridge Inventory MO14 <https://www.fhwa.dot.gov/bridge/nbi/ascii.cfm?year=2014>
- <sup>xxxi</sup> <https://www.youtube.com/watch?v=QYj7H4RHAXQ>
- <sup>xxxii</sup> FY14 County Aid Road Trust Fund Distribution <http://dor.mo.gov/publicreports/>
- <sup>xxxiii</sup> 2015 BRM Estimated Project Cost <http://www.modot.org/business/lpa/BridgeEligibilityListing.htm>
- <sup>xxxiv</sup> Missouri: 2010 Summary Population and Housing Characteristics <http://www.census.gov/prod/www/decennial.html>
- <sup>xxxv</sup> "Missouri Transportation by the Numbers," TRIP, April 2015 [http://www.tripnet.org/docs/MO\\_Transportation\\_by\\_the\\_Numbers\\_TRIP\\_Report\\_April\\_2015.pdf](http://www.tripnet.org/docs/MO_Transportation_by_the_Numbers_TRIP_Report_April_2015.pdf)
- <sup>xxxvi</sup> <http://www.epa.gov/airquality/greenbook/ancl.html>
- <sup>xxxvii</sup> Statewide Transportation Improvement Program 2017-2021 [http://www.modot.org/plansandprojects/construction\\_program/STIP2017-2021/](http://www.modot.org/plansandprojects/construction_program/STIP2017-2021/)
- <sup>xxxviii</sup> 2014, FHWA Tables HM-14 and HM-80 <https://www.fhwa.dot.gov/policyinformation/statistics.cfm>



## Summary of Services at Gateway Commerce Center & Lakeview Commerce Center

**To:** US Department of Transportation  
Missouri Department of Transportation  
Illinois Department of Transportation  
Madison County Government

**Date:** January 30, 2017

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### **SUMMARY:**

For nearly a decade, Madison County Transit (MCT) - the multi-modal transportation provider for Madison County, Illinois – has grown its services in Gateway Commerce Center (GCC). GCC is a growing distribution center located in Madison County with dozens of warehouses, employing more than 5,000 individuals. Within the last few years employment numbers have also increased at nearby Lakeview Commerce Center (LCC). Staffing agencies estimate that 25% of the employees at these distribution and fulfillment centers are transit dependent and require a bus or carpool to access employment.

### **JARC SUCCESS STORY:**

Nearly a decade ago, in 2008, MCT applied for Job Access Reverse Commute (JARC) operating funds to expand service on the #5 Tri-City Regional to the GCC. The objective of the project was to expand transit service from the urban core - the Tri-Cities communities of Granite City, Madison and Venice – to the GCC, a growing suburban employment center. MCT received the grant and implemented additional weekday trips immediately. The service was well received and with gas prices eclipsing \$4.00 in the summer of 2008, ridership climbed to its highest levels on the #5. The service to the GCC that was established through the assistance of this JARC grant has continued to expand. Today, the GCC is one of the largest employers in Madison County and one of the most popular trip generators in the MCT system.

### **AMAZON IN MADISON COUNTY:**

Madison County was fortunate to be selected by international online retailer, Amazon, as the site of two new fulfillment centers which opened in August 2016 – one in the GCC and the other in the LCC. Combined, these centers employ about 2,600 people. Because of the level and frequency of bus service to these locations, it is believed that MCT's presence played a role in Amazon's decision to locate in this region. Amazon Transportation Planner Neal Abbott remarked that MCT has been one of the most responsive transit systems that he's worked with in the country.

### **CURRENT BUS SERVICE**

MCT currently offers the following at the GCC:

- 73 trips each weekday
- 38 trips on Saturday and 25 trips on Sunday
- 13 bus stop locations throughout the center



- With the opening of the new Amazon site in August, MCT has extended service to the facility and worked with developers, as well as Madison County to construct a bus turnaround on Gateway South to safely serve the new building.
- This fall, MCT participated in 30 new employee orientations at Amazon to promote the bus service and gather feedback about shift times and communities of origin.

MCT currently offers the following at the LCC

- 59 trips each weekday
- 24 trips on Saturday and 24 trips on Sunday
- 4 bus stop locations throughout the center

#### **CARPPOOL OPPORTUNITIES & THE GUARANTEED RIDE HOME**

MCT also operates RideFinders, the free rideshare program for the 9-county St. Louis region, which provides the following to GCC and LCC employers:

- Free online carpool/vanpool ride-matching service
- Free assistance with setting up carpools and vanpools
- Free "Guaranteed Ride Home" for employees who rideshare (4 free taxi rides home per year per employee in the event of emergency)
- Free preferential parking signs for employers
- Free preferential parking hangtags for employees
- At the Amazon orientations, staff also registered nearly 1,000 employees in the RideFinders program, formed carpools and discussed the Madison County Vanpool Initiative detailed below.

#### **MADISON COUNTY VANPOOL INITIATIVE**

MCT has launched a "Madison County Vanpool Initiative" for employees who live in Madison County and work at the GCC or LCC. Here are the details of the program:

- A vanpool is a group of commuters who ride to and from work in a van provided by RideFinders.
- Vanpools must have a minimum of 7 participants with 2 of the participants serving as drivers.
- Fares are only \$50 per month per rider and include use of the van, fuel, oil changes, insurance and other preventative maintenance. Primary Drivers receive a free commute.
- Madison County Vanpool participants will receive the first full month of service for FREE.
- RideFinders is hosting Vanpool Formation meetings at both GCC and LCC, in hopes of forming its first Madison County Vanpools at this location.

#### **COMING IN FEBRUARY 2017**

At the upcoming service change on February 5, 2017, MCT will be increasing the frequency of service to jobs at the GCC and LCC from the Riverbend communities as well as improving the weekend service from the Tri-Cities and East St. Louis. The following details bus service to the GCC from each area:

#### **BUS SERVICE TO GATEWAY COMMERCE CENTER (February 5, 2017)**

##### **Bus Service from the Riverbend Area**

*(Alton, Wood River, Bethalto, Roxana, South Roxana, Hartford)*

Route: #6 Roxana – Pontoon Beach and #1 Riverbend, connects to routes at Wood River Station that serve Gateway Commerce Center

Level of Service: Monday - Sunday



**Frequency**

Weekday: Every 30 Minutes

Saturday/Sunday: Every 60 Minutes

**Span**

Weekday: 4:48 AM to 11:36 PM

Saturday/Sunday: 6:47 AM to 6:40 PM

**Bus Service from Central Madison County**

*(Edwardsville, Glen Carbon, SIUE, Maryville)*

**Route:** #4 Madison – Edwardsville, connects to routes at Liberty & Chain of Rocks that serve Gateway Commerce Center

**Level of Service:** Monday - Sunday

**Frequency**

Weekday: Every 30 minutes

Saturday/Sunday: Every 60 Minutes

**Span**

Weekday: 5:18 AM to 10:46 PM

Saturday: 7:46 AM to 6:10 PM

Sunday: 7:46 AM to 6:10 PM

**Bus Service from the Tri-Cities Area**

*(Granite City, Madison, Venice, Pontoon Beach)*

**Route:** #20 Granite City – Pontoon Beach Shuttle has direct to service Gateway Commerce Center

**Level of Service:** Monday - Sunday

**Frequency**

Weekday: Every 30 minutes

Saturday/Sunday: Every 60 Minutes

**Span**

Weekday: 3:13 AM to 12:48 AM

Saturday: 5:13 AM to 12:45 AM

Sunday: 6:47 AM to 8:13 PM

**St. Clair County / Downtown St. Louis**

**Route:** #5 Tri-City Regional; connects to Granite City Station with a timed connected to the #20 with service to Gateway Commerce Center.

**Level of Service:** Monday - Sunday

**Frequency**

Weekday: Every 30 minutes

Saturday/Sunday: Every 60 Minutes

**Span**

Weekday: 4:01 AM to 1:15 AM

Saturday: 4:46 AM to 1:27 AM

Sunday: 7:18 AM to 9:15 PM



FTA Region VII:  
901 Locust St. Suite 404  
Kansas City, MO 64106  
816-329-3920