2004 TRANSPORTATION PLANNING CERTIFICATION REVIEW REPORT

St. Louis Metropolitan Area

Certification Review by:

Federal Highway Administration

and

Federal Transit Administration

July 20-22, 2004
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Purpose of Review

As required by 23 U.S.C. 134(i)(5) and 49 U.S.C. 1607, the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) jointly review and certify the metropolitan transportation planning processes in Transportation Management Area (TMA) at least every three years. A TMA is an urbanized area, as defined by the U.S. Census, with a population of over 200,000. There are 152 TMAs in the U.S., based on the 2000 Census. The purpose of a Certification Review of a TMA is to determine if the planning process can be certified as meeting the requirements in the metropolitan planning regulations (23 CFR 450).

In general, a Certification Review consists of three primary activities: a site visit, review of planning products, and preparation of a report, which summarizes the review and offers findings. The reviews focus on compliance with federal regulations, challenges, successes, and experiences of the cooperative relationship between the Metropolitan Planning Organization (MPO), State Transportation Agency and transit operator in the conduct of the metropolitan planning process. Joint FTA/FHWA certification review guidelines provide agency field reviewers with latitude and flexibility to tailor the review to reflect local issues and needs. As a consequence, the scope and depth of the certification review reports may vary.

The certification review process is only one of several methods used to assess the quality of a local metropolitan planning process, compliance with applicable statutes and regulations, and the level and type of technical assistance needed to enhance the effectiveness of the planning process. Unified Planning Work Program approval, Metropolitan and Statewide Transportation Improvement Program findings, air quality conformity determinations (in non-attainment and maintenance areas), as well as a range of other formal and less formal contacts provide both FHWA and FTA an opportunity to provide feedback regarding the planning process. The results of these other processes are considered during the certification review process.

The metropolitan planning organization (MPO) for the St. Louis TMA is the East-West Gateway Council of Governments (EWGCOG), which was formerly East-West Gateway Coordinating Council. In 2004, a Certification Review was performed by FHWA and FTA of the transportation planning process for the St. Louis Transportation Management Area. The focus of this review was to:

1.) determine if the metropolitan transportation planning activities in the St. Louis TMA are being carried out in accordance with the governing metropolitan planning regulations, policies, and procedures;

2.) 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;

3.) 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; and

4.) determine if the EWGCOG transportation planning process including the Transportation Improvement Program (TIP) is financially constrained, and that the revenue sources identified demonstrate that the proposed Federal-aid projects can be advanced.
Review Format and Guidelines

The on-site portion of a Certification Review of the transportation planning process for the St. Louis Transportation Management Area was performed by FHWA and FTA on July 20-22, 2004. The U.S. Environmental Protection Agency (U.S. EPA) participated in the air quality planning portion of the review. The review was conducted at the new offices of the EWGCOG located at One Memorial Drive, Suite 1600, St. Louis, Missouri. Prior to the review, the Federal review team developed an updated set of review guidelines in the form of questions based on the review of documents, files and the team’s working knowledge. These updated guidelines were provided to the MPO in advance of the review. (Copies of the guidelines are attached in Appendix B.) In addition, EWGCOG staff provided responses to the guideline questions in advance. Although not required, this information was of great assistance to the review team during the on-site portion of the review.

As a part of the on-site review, the federal team met with representatives from the EWGCOG Executive Advisory Committee (EAC) on July 20, 2004. Items discussed included funding, issues involving the TIP, and noteworthy practices.

A Public Involvement session was held the evening of July 20 at the EWGCG boardroom from 6:30 to 8:15 P.M. The FHWA/FTA review team opened the meeting by discussing the certification review process. Those persons attending the meeting were then asked for comments concerning the transportation planning process in the St. Louis metropolitan area. FHWA, FTA and EWGCG staff members answered questions and addressed issues from interested citizens. Detailed information from the meeting is attached in Appendix D.

With the passage of TEA-21 in 1998, a public involvement component was mandated statutorily for the TMA Certification Review process. The principal objective of this component is to provide the opportunity for the public to express their thoughts and comments about the transportation planning process and specifically how the process is meeting the needs of the area. In order to provide this opportunity for public engagement, a public meeting was held the evening of July 20, 2004 at the EWGCOG boardroom from 6:30 to 8:15 P.M. The meeting was advertised by a variety of methods including local newspapers, the MPO website, briefings to local governments, and direct mailings and e-mailings.

The public meeting included a brief presentation by the Certification Review Team and an open forum to receive public comments. Comments from this meeting and additional written comments submitted after the meeting are included in Appendix C of this report. While there was a relatively small turnout for the meeting, meaningful discussion was held on several topics including bicycle and pedestrian accommodations, project listings in the TIP, expectations of public involvement, and funding for transportation improvements. All of these topics have been examined as part of this certification review and the public comments provided helped to mold the recommendations found in this report on pages 31xx-33.
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Executive Summary

East-West Gateway Council of Governments (EWGCOG) Metropolitan Planning Organization

The EWGCOG is a voluntary association of local governments in an eight county area that encompasses the St. Louis metropolitan area. The counties included in the St. Louis metropolitan area include Franklin, Jefferson, St. Charles, and St. Louis Counties and the City of St. Louis in Missouri as well as Madison, Monroe, and St. Clair Counties in Illinois. EWGCOG’s Board of Directors meets monthly and consists of twenty one voting members including 14 local elected officials named in the agency’s bylaws, six appointed citizens, and the Chair of the Metro’s Board of Commissioners. The Board also includes four non-voting members. One week prior to the monthly board meeting, the Executive Advisory Committee (EAC) of EWGCOG meets to discuss all matters that will go before the Board. The Board of Directors is considered the decision-making body.

In addition to the Board of Directors and the EAC, there are four other groups that meet on a monthly basis: the Transportation Planning Committee, the Air Quality Advisory Committee, the Bicycle and Pedestrian Committee, and the Paratransit Advisory Committee. Committee members are appointed by the Board and include members of implementing agencies, resource agencies, environmental interest groups, and local jurisdictions.

The EWGCOG staff is organized in to four departments: Administration, Planning and Information Systems, Transportation Planning, and Policy and Community Development. The scope and breadth of staff activities increased in order to respond to the broader view of transportation in accordance with the passage of ISTEA and TEA-21 legislation. The work of the EWGCOG staff has over a period of time become more policy-oriented and broader in scope to reflect goals such as economic growth and environmental justice.

EWGCOG maintains a web site (www.ewgateway.org) that is all-inclusive of staff activities, and also includes transportation plans, meeting agendas and notes, links to other transportation and local agencies as well as state and federal agencies. The website provides an Online Date Center, and the Air Quality Resource Center. A link is also provided called, “We’re Listening,” which gives web site visitors the opportunity to comment on regional activities and initiatives. The review team and EWGCOG recognize the opportunity for enhancing the website through the insertion of links to Federal agencies air quality conformity sites including FHWA’s site and US EPA site for St. Louis air quality information.

Cooperating Agencies / Agreements and Contracts

The following Formal Memorandums of Understanding (MOUs) currently exist between the MoDOT, IDOT, EWGCOG and local transit agencies:

- 1972 MOU agreement signed by IDOT, MoDOT, and EW Gateway.
• 1996 MOU agreement between MoDOT and EWGCOG that is in the process of being updated.
• 1996 MOU agreement between EW Gateway and Bi-State Development Agency
• 1998 MOU agreement between EWGCOG and Madison County Transit

There is no existing agreement between EWGCOG and the St. Clair County Transit District since St. Clair County relies on Metro for service planning and operations. However EWGCOG staff serves as the transit district manager. The Madison County Transit District agreement with EWGCOG was updated in 1998. It was observed at the Review that EWGCOG, MoDOT and IDOT do not rely on the 1972 MOU agreement for direction in carrying out transportation planning and programming activities in a cooperative, coordinated, and comprehensive manner. The MPO (EWGCOG), and IDOT’s reliance on the outdated three party 1972 MOU does not meet the requirements of 23 CFR 450.310. These principals in the metropolitan planning process are directed to realize cooperative planning agreements consistent with 23 CFR 450.310 by December 1, 2005. To the extent practical, these entities are expected to engage in one agreement between the MoDOT, IDOT and EWGCOG and one agreement between EWGCOG and all three local transit agencies (Metro, St. Clair County Transit District, Madison County Transit District) outlining their respective roles and responsibilities within a cooperative planning process.

Transit Agencies

The Metro, formerly known as the Bi-State Development Agency, is the regional transit operator and operates bus and light rail (“MetroLink”) services in St. Louis City and County, Missouri and St. Clair County, Illinois and paratransit (“Call-a-Ride”) service in the St. Louis City and County. Metro is responsible for planning, constructing, maintaining, owning and operating transportation facilities in the Bi-State Metropolitan Development District. In Missouri, the Metro is funded by a ½ percent sales tax in St. Louis City and County that primarily supports bus and light rail operations, and a ¼ percent sales tax in St. Louis City and County that was enacted to support MetroLink expansion. Metro receives just over $1 million a year in financial support from the State of Missouri.

The Madison County Transit District and the St. Clair County Transit District operate transit services in Illinois. These Districts receive local sales tax funds dedicated to transit (1/4 percent in Madison County, and ¾ percent in St. Clair County). Most funds received by the St. Clair district are paid to Metro under a transit service contract between the two agencies. The Madison County Transit District operates its own bus and paratransit system. Capital and operating assistance for these two districts also comes from the Illinois Department of Transportation. The states of Illinois and Missouri do not operate or maintain transit facilities.

Metro is also involved in the Transportation Corridor Improvement Group (TCIG). The TCIG is a permanent planning group that consists of staff from the Metro, Missouri Department of Transportation (MoDOT), and EWGCOG who are responsible for overseeing all major transportation-planning studies in the Missouri portion of the region.
Formal Memorandums of Understanding (MOUs) exist between EWGCOG and the Metro (1996), MoDOT (1996), and the Madison County Transit District. The MOU with MoDOT was revised in 2004.

**Financial Planning**

A review of the financial planning was integrated as a component of the certification review process for the St. Louis TMA that was designed to help the metropolitan planning organization’s program planning, and to demonstrate financial constraint to the public, which allows for review and comment. The Federal-aid highway funds regularly received by the EWGCOG from Missouri includes the following programs; Surface Transportation Program (STP) for Urbanized Areas, STP for Transportation Enhancements, Congestion Mitigation and Air Quality, and Bridge Replacement and Rehabilitation. EWGCOG does not have direct authority to dedicate or designate future revenue streams aside from programming federal funds and setting priorities. The EWGCOG monitors the expenditure of pass-through funds and other administrative grants management requirements. The EWGCOG meets the single audit requirements in accordance with the Office of Management and Budget (OMB) Circular A-133, Audits of States, Non-Profits, and Local Organizations. In addition, the “Schedule of Indirect Costs” for the year ended December 31, 2002 was approved in accordance with OMB Circular A-87, Cost Principles for State, Local, and Indian Tribal Governments.

Missouri highway funding has steadily declined from 2001 to 2004. In order to efficiently utilize these limited Federal funds, the EWGCOG in April 2001 adopted a “Reasonable Progress” policy in order to ensure that locally sponsored projects are completed in a timely manner. The policy that applies to locally sponsored transportation projects states, “For projects or programs included in the TIP, “reasonable progress” will have been made if the project advances to the point of obligating all federal funds programmed for that project in the current fiscal year, regardless of the phase of work (i.e., PE, ROW, or PSE/Construction). If a project fails to obligate the programmed federal funds by September 30 of the current year, the funding will be forfeited and returned to the regional funding pot.” Over the past three years, the Board of Director’s enforcement of the Reasonable Progress Policy has reduced the backlog of unobligated balances from more than $108 million to zero dollars at the end of Federal fiscal year 2004. The EWGCOG’s refinement of the policy and the cooperative and coordinated effort of delivery continues to better ensure that the St. Louis metropolitan planning area receives the maximum benefit of its federal transportation funds.

For the most part, local governments in the St. Louis metropolitan area fund transportation through property tax and general fund revenues. Many local governments have also enacted capital improvement sales taxes to fund transportation projects. In addition, more than twenty transportation development districts have been created (largely by municipalities,) to finance projects by using income generated from local assets. Metro has taken advantage of several financing programs to raise locally generated funding, and the agency has also received a State Infrastructure Bank (SIB) loan for the GateWay Multi-Modal Center project from MoDOT.

EWGCOG stated that MoDOT has provided information on two innovative financing options, Tapered Match and Advance Construction to help local agencies to accelerate projects. With the
Tapered Match option, the non-Federal matching requirement applies to the aggregate cost of a project rather than on a payment-by-payment basis for incremental project costs. The Advance Construction option allows local agencies to begin a project if the state does not have sufficient Federal-aid obligation authority to cover the Federal share of the project costs. Under Advance Construction, reimbursement for project costs will not be made until the project is converted to a funded project. FHWA continues to encourage the use of innovative financing tools to the fullest extent possible in order to advance the construction of transportation projects.

EWGCOG has also expressed interest in examining the value of FHWA’s Interstate Reconstruction and Rehabilitation Pilot Toll Program and its implications for financing two major projects in the St. Louis Region: the reconstruction of I-70 through the St. Louis metropolitan area and the construction of a new Mississippi River Bridge.

EWGCOG provided Federal review team with their Fiscal Year (FY) 2005 (July 1, 2004 to June 30, 2005) Unified Planning Work Program (UPWP). The MODOT and IDOT in-kind match is listed in the EWGCOG FY 2005 UPWP Funding Summary Chart. However, the “Other Category” of local funding is not clearly identified for verification. Third party in-kind contributions counting towards satisfying a cost sharing or matching requirement must be verifiable.

Planning Area Boundaries

The Metropolitan Planning Area (MPA) boundary is established for EWGCOG’s delivery of a comprehensive, cooperative, and continuing urban transportation planning process. The MPA boundary did not change as a result of the 2000 Census. Regional growth rates and patterns do not justify an expansion of the MPA for the Long Range Transportation Plan (LRTP). The 1-hour ozone maintenance boundary and the MPA boundaries remains the same; however, the 8-hour ozone non-attainment area extends beyond the MPO boundary to include Jersey County, Illinois. Discussions with the Inter-Agency Consultation Group (IACG) determined that IDOT would coordinate conformity issues in Jersey County.

The Urban Area Boundaries (UABs) are fixed primarily for capital project funding. The 2000 U.S. Census results changed the Urban Area Boundaries (UABs) in the St. Louis metropolitan area. EWGCOG in cooperation with the Illinois Department of Transportation (IDOT) and MoDOT modified the Urbanized Area (UZA) to encompass the entire corporate limits of any municipality that the Census identified as partially urban. Adjustments were also made to include within the UZA all major transportation terminals, transit service areas, educational institutions, and airports. It should be noted that the boundary did not move inward. In their 2000 Census, the Census Bureau replaced the “urban place” with the “urban cluster” to address the problem that some political boundaries included rural areas. FHWA allowed States the flexibility of using either the Census urban place or the Census urban cluster. MoDOT and EWGCOG cooperatively agreed to use the Census “urban cluster” definition as the basic urban area criteria. The States were required to cooperate with local officials before making their decision. The “urban cluster” definition will be applied consistently throughout the State.
An updated 2000 Federal-Aid Urbanized Area map was initiated and received local approvals. The final updated 2000 Federal-aid Urbanized Area and Cluster maps were approved by FHWA on July 1, 2004. The FHWA Missouri Division’s approval provided in coordination with the Illinois Division, included observations for corrections on future UAB updates. The review team discussed these needed corrections with MoDOT and EWGCOG during the on-site segment of the certification review. Both MoDOT and the EWGCOG agreed that the identified changes were necessary and as such agreed to implement in the future.

EWGCOG maintains a set of functional classification maps. Due to some adjustments to the UAB, some of the highways had to be functionally reclassified and are currently under review by IDOT and MoDOT. Major updates of the functional classification system are made based on a review of changes in travel demand or roadway operations. EWGCOG has committed to review the entire system every three to five years and has established a process for minor, bi-annual revisions to the system. These standards and procedures were published by EWGCC in June 2003 and adhere to FHWA’s directives.

**PLANNING PROGRAM WORK PRODUCTS**

**Unified Planning Work Program (UPWP)**

EWGCOG’s work program year runs from July 1 to June 30. The UPWP is the document that is used by EWGCOG to organize and unify all of its planning program work for the upcoming year. EWGCOG work elements in the UPWP are developed through a coordinated effort among EWGCOG’s department directors based on a general estimate of the budget for the upcoming year. Current work program elements are identified to determine what needs to be carried in to the next fiscal year. The EWGCOG staff evaluates and modifies the work items necessary to support ongoing agency programs and to meet federal requirements. The staff reviews necessary elements to evaluate major issues, emerging trends, and federal emphasis areas, and identifies subject areas that fit with the agency’s policy agenda, sphere of influence and staff resources. Work elements are then created for those subject areas. In addition, work elements proposed by cooperating agencies are typically incorporated into the program as submitted.

EWGCOG does not determine the needs of units of governments, but an assessment of needs is made based on an evaluation of the transportation system and its performance in serving the needs of citizens. The UPWP is designed to produce the analysis to quantify transportation needs that lead to planning and programming of suitable transportation improvements or policy changes. During the UPWP’s development, EWGCOG staff becomes aware of significant planning activities of the major cooperating agencies, regardless of the funding source. All planning activities, irrespective of jurisdiction, are incorporated. Prioritizing work items involves a mix of four questions: Is funding available for the work element? How vital is the proposed work to the community, economic and environmental health of the region? Is the EWGCOG the most appropriate agency to carry out the work? Can the EWGCOG sustain the activity? Unexpected circumstances sometimes necessitate additions to the UPWP outside of the regular annual cycle. When this happens, and funding has been clearly identified for any new activities, the Board of
Directors are presented the opportunity to amend new work activity into the UPWP as part of the Board’s monthly meetings.

The elements contained in the UPWP respond in various ways to the region’s transportation needs and priorities. Long-range plan elements are used to create broad regional policies and priorities, to establish a comprehensive framework for transportation decision-making, and defines how that framework is employed in planning and programming activities. The short-range plan elements include creating and sharing information, developing programs and cooperative planning processes and supporting implementation activities, and programming funds in a manner consistent with regional priorities. Corridor plan elements focus on the project development process in major transportation corridors or subareas. These elements provide the link between long-range planning (where the need for the corridor improvements are first recognized), to project programming, (where funds are committed to corridor improvements.) Corridor planning projects represent an output from, and an input to, the LRTP. Other elements in the UPWP focus on specific community, economic, and environmental effects of the transportation system, especially as the system relates to labor force and job access issues, and regional public investment and development policies.

EWGCOG reviews and incorporates, in ways appropriate to local needs, the annual Planning Emphasis Areas (PEAs) from FHWA and FTA into UPWP elements and study processes. Because the PEAs typically are preceded by other federal guidance, they usually are consistent with the direction EWGCC work activity is proceeding. EWGCOG included a new work element for its FY 2005 UPWP – Integrated Transportation Systems Management and Operations – to reflect a greater emphasis on Intelligent Transportation Systems (ITS) and the importance of system operations. This UPWP work activity is being carried out for the purpose of achieving the goal of integration of the Regional Architecture for entire St. Louis metropolitan planning area into the IDOT and MoDOT Statewide Architecture plans by April 8, 2005.

EWGCOG’s FY2005 UPWP contains a large number of work activities to be completed in FY2005 at an estimated cost of $7,491,000. The major planning and problem solving functions to be performed during the year have been grouped under three broad headings: Regional Infrastructure, Regional Economic Growth, and Regional Communities. There are multiple main headings under each of the three main planning functions. These main headings are assigned work element numbers. There are multiple sub-headings under several of the main headings, some consisting of a series of individual work elements. The sub-heading work activities are labeled with a letter. A cost estimate is shown only for the main heading broader topics. Major work activities shown as lettered sub-headings do not include a cost estimate. Part 420.111(b) of title 23, CFR, requires UPWPs that document transportation planning activities to include a description of work to be accomplished and cost estimates for each work activity.

EWGCOG does a good job of documenting a description of work activity to be completed under each of the headings identified with a work element number, however, they provide no summary cost estimate for lettered sub-heading work activities. FHWA and FTA, as part of its review of the draft FY2005 UPWP, recommended that EWGCOG show a breakout of total estimated costs for each major work activity shown as a lettered sub-heading within the coded broader major heading. FHWA and FTA agree with EWGCOG’s election to not show a separate cost estimate for each of
the series of individual work elements that fall under a major work activity lettered sub-heading. This matter was discussed with EWGCOG and MoDOT during the on site review. The review team considers this recommendation to add value to users and readers of the UPWP while assuring a more adequate level of alignment with Federal requirements relative to showing cost estimates for each transportation planning activity.

The review team also observed that Missouri and Illinois FHWA Planning Funds (PL) are segregated to some extent and spent in their respective states. This is not considered a common practice in other Bi-state MPOs and EWGCOG, MoDOT, and IDOT are encouraged to consider a more regional approach to expending PL funds. The review team notes that there has been some difficulty in providing the local match for PL funds. The current source of PL match funds comes from the counties. It is a per capita contribution. However, only 10-15% of projects in the TIP are county sponsored projects. The contribution from counties does not cover the match requirements. Both states provide in-kind match. If there are substantial increases in future PL funds, the EWGCOG might have difficulty matching them.

EWGCOG reviews and incorporates, in ways appropriate to local needs, the annual Planning Emphasis Areas (PEAs) from FHWA and FTA into UPWP elements and study processes. Because the PEAs typically are preceded by other federal guidance, they usually are consistent with the direction staff is proceeding. In order to meet the April 8, 2005 deadline for development of an ITS regional architecture, EWGCOG included a new work element – Integrated Transportation Systems Management and Operations – to reflect a greater emphasis on Intelligent Transportation Systems (ITS) and the importance of system operations. This UPWP work activity is being carried out for the purpose of achieving the goal of integration of the Regional Architecture for the entire St. Louis metropolitan area into the IDOT and MoDOT Statewide Architecture plans by April 2005.

Transportation Improvement Program (TIP)

The TIP is developed annually and covers a five-year period. EWGCOG’s project evaluation and selection procedures of projects for inclusion in the TIP are based on the principles and priorities outlined in the metropolitan transportation plan. In addition, MoDOT and IDOT consider EWGCOG’s priorities when submitting projects for the TIP. Criteria used to set project priorities is included in the TIP; however, if there are issues or problems with a particular project, those are not included. A separate reasonable progress reporting process is used to detail that information.

23 CFR 450.324 requires the MoDOT, IDOT, and transit operator to provide EWGCOG with estimates of available Federal and State funds. EWGCOG’s receives estimated available funding target amounts from both IDOT and MoDOT; however, the approach each agency utilizes to deliver revenue estimates varies greatly. EWGCOG expressed concern with MoDOT’s practice of administering multiple adjustments throughout the year to their estimated revenue funding targets. Such practice results in EWGCOG’s uncertainty of what target funding amount to program for in the TIP process and negatively impacts the quality of EWGCOG’s public review process. The IDOT approach to delivering revenue estimates, in which they settle on a one-time revenue estimate and limit any necessary adjustment to a one-time end of the year action, is viewed by
EWGCOG as a much better approach. This matter was discussed at length with MoDOT and EWGCOG participants during the on-site segment of the review.

Metro provides information when the program is submitted as well. Generally, there are significantly more discretionary funds identified that can reasonably be expected. EWGCOG staff works with the Metro staff to develop a more reasonable estimate during the development.

The TIP includes all federally funded projects that will be implemented and is financially constrained each year and by each federal funding program. The TIP typically contains only the projects that can be funded within the revenue estimates prepared as part of the TIP development process. The revenue estimates are required to reflect fund amounts that can reasonably be expected to be available. Local project sponsors are required to certify that local funds are available to meet the federal match requirements by submitting with project applications, a non-federal funding disclosure form. The form includes no field requiring the identification of funding type or whether the sponsor’s matching funds are expected to come from a new or proposed funding source. EWGCOG’s recognition of new funding sources and review of a project sponsor’s strategy for ensuring their availability is expected to be a part of their TIP financial plan (23CFR 450.324(d) (e)). The incorporation of funding type, current revenue, and proposed revenue entry fields into the current disclosure form would enhance EWGCOG’s ability to fulfill this financial plan requirement.

Local transportation project sponsors desiring to have their “new” projects considered for Federal funding under Title 23, U.S.C. and for inclusion in the TIP are required to annually submit a project application to EWGCOG each March. Project sponsors are responsible for all cost estimates. Sponsors typically prepare reliable estimates because they are aware federal funds are limited and there is little opportunity to increase the programmed federal funds for a project once it is included in the TIP. Each sponsoring agency is required to provide detailed project cost information. EWGCOG evaluates the projects using weighted scoring process. Evaluation inputs include; facility/vehicle usage, annualized Federal costs, cumulative project scores, and determination of cost effectiveness. Sponsors of projects selected for inclusion in the TIP are required by the Region’s Reasonable Progress policy to attend the EWGCOG’s Project Implementation Workshop typically held in October of each year. The workshop is for Missouri only projects. MoDOT and IDOT transportation projects within the St. Louis metropolitan planning area are not subjected to the same local project selection process. EWGCOG does, however, desire that MoDOT and IDOT transportation projects be submitted to EWGCOG in a timeframe consistent with the local project selection in order to allow for the Board of Directors adoption of the TIP at its July meeting.

MoDOT and IDOT have full responsibility for the operation and maintenance of their state highway systems, as well as some non-state roads. Nearly forty miles of major arterials in the City of St. Louis are the responsibility of MoDOT as directed by the Missouri General Assembly. MoDOT and IDOT complete a thorough and detailed project scoping process to estimate project costs prior to submitting their projects for inclusion into EWGCOG’s TIP. As previously noted, the 2001 Certification Review Team’s final report found that the timing of MoDOT’s submission of projects for the TIP did not reflect effective coordination, resulting in the EWGCOG not having adequate time for review. The final report included a recommendation that MoDOT re-evaluate its
current project scheduling procedure to determine if a way to alleviate the time constraint problem. The review team has observed that little, if any, progress towards improvement was made in this planning coordination effort since the last review. EWGCOG continues to recognize the project submittal process followed IDOT as effective, while expressing strong concerns with an unchanged MoDOT process. EWGCOG pointed to their receipt of the MoDOT project list just days prior to this year’s July Board of Director’s meeting as a clear reflection of a broken coordinated and cooperative planning process in the area of TIP project selection.

Unobligated federal funds from prior years are built into the TIP but not separately identified as part of the revenue forecast of reasonable expected Federal funds. The TIP includes a listing for which federal funds were obligated in the preceding year. This information is also provided through the project monitoring process.

The TIP is a working document that often requires amendments during the year to reflect funding availability and to aid in implementing projects efficiently. The TIP can be amended at any time during the year although it is generally amended mid-year for projects that are being implemented in year one of the program. If project modifications are made by moving projects from one TIP year to another, a project, or projects of similar cost and category, are moved to accommodate modifications and offset any change (annually.) The exception is if additional revenues are received in year one of the TIP. The amendments are proposed on the agency’s website. Public outreach only occurs for TIP approval and major amendments.

**Long Range Transportation Plan (LRTP)**

The current LRTP, with the horizon year of 2025, was adopted by the Board of Directors in March 2002. EWGCC has merged the seven planning factors required by TEA-21 to fit within the six focus or priority areas established by EWGCC in the LRTP to guide regional decision-making. The focus areas are: preservation of existing infrastructure, safety and security in travel, congestion, access to opportunity, sustainable development, and efficient movement of goods.

EWGCOG staff is preparing the update of the plan for Board approval in March 2005. The new LRTP will have the horizon year of 2030 and the scope will incorporate 11 items of 23 CFR 450.322(b). As part of the current long-range plan development effort, staff is working to refine performance measures and evaluation methods that can be used to analyze the state of the system, to evaluate individual projects in regional and sub regional planning studies, and to establish project priorities relative to the six factors. EWGCOG is committed to the mandatory three-year cycle for the LRTP.

EWGCOG receives information on financial resources from cooperating agencies for the upcoming LRTP update. EWGCOG occasionally has to modify the information to compensate for over-optimistic revenue forecasts or to test financial scenarios, but for the most part, the information provided is accurate. There is no formal process with state DOTs or Metro for developing information on financial resources; however, the current process presents no major difficulties.
Although the LRTP addresses performance measures, performance standards have not been developed. EWGCOG does not believe it is ready for using performance measurements to direct investment.

**Bicycle and Pedestrian Accommodations**

EWGCOG is in the process of completing the update of their St. Louis Regional Bicycle and Pedestrian Facilities Plan. The original plan was adopted in 1994. The goal of the updated plan is to integrate bike trails and facilities seamlessly into the regional transportation system. The 1994 plan focused primarily on recreational bicycle travel in the region’s parks and along the region’s waterways. The updated version will shift focus to bicycle and pedestrian modes of travel incorporated into the fabric of daily travel patterns, with a stronger presence of bicycle and pedestrian facilities on local streets. In keeping consistent with this new plan, bicycle and pedestrian improvements are identified as a performance measure of one of the six priority areas used to evaluate and rank locally submitted projects for inclusion into the TIP. The sponsor application form includes the 23 USC 217 (g) statement that says bicyclists and pedestrians shall be given due consideration in the comprehensive transportation plans developed by each metropolitan planning organization and that bicycle transportation facilities and pedestrian walkways shall be considered, where appropriate, in conjunction with all new construction and reconstruction of transportation facilities, except where bicycle and pedestrian use are not permitted. The project sponsors are also required to identify what bicyclist and pedestrian facilities are incorporated into the project and to provide explanation should such facilities be absent from the project.

EWGCOG’s efforts to date represent very credible alignment with the intent of TEA-21 for bicyclists and pedestrians to have safe, convenient access to the transportation system and for transportation improvements to be an opportunity to enhance the safety and convenience of these two modes. The certification review team believes that further advancement in this area can be achieved with the inclusion of 23 USC 217 (g) in EWGCOG’s New Project Application and EWGCOG’s defining of the exceptional circumstances in which facilities for bicyclists and pedestrians will not be required in all transportation projects. The certification review team considers these next step actions to be consistent with the goals of EWGCOG’s updated Bicycle and Pedestrian Facilities Plan, Federal planning requirements, and the purpose and goals of FHWA’s bicycle and pedestrian guidance.

**Safety**

Safety is a high priority area for EWGCOG and its planning partners. This priority is reflected in the evaluation measures used to select projects for the TIP and LRTP, and in the rigorous evaluation of safety issues in corridor and subarea studies. For projects proposed for inclusion in the TIP and LRTP, the safety evaluation process is point-based. Both processes include safety measures that are evaluated and given priority consideration in awarding points. Points are awarded to competing projects and given priority consideration.
EWGCOG staff actively analyzes traffic accident fatality rates by reviewing fatal accident statistics, preparing maps showing locations of such accidents, and reviewing accidents’ contributing factors. In 2003, EWGCOG completed detailed analysis of the primary causes of accidents in metro St. Louis and a comprehensive review of safety related statistics and transportation safety measures adopted by state governments nationwide. In 2004, EWGCOG is committed to carrying out their formalized “Transportation Safety Initiative” which focuses on the three “E’s” of transportation safety: enforcement, emergency response, and education, that complement the more traditional transportation engineering approach. The enforcement component is currently being planned and will be implemented in cooperation with the Local Government Leadership Partnership, which is managed in part by EWGCOG. The emergency response component is being developed with the affiliated homeland security initiative, St. Louis Area Regional Response System (STARRS). STARRS is being used to identify and assess vulnerability of transportation facilities and is also being used to develop plans to protect such facilities including airports, freight terminals, and to protect freight movement on the highway and rail networks.

The educational component of the program will involve an advisory committee composed of 15 members who have been closely involved with analyzing the location and causes of automobile accidents. A professional facilitation and communications firm is working with this group to develop messages, identify media, and devise other educational tools to promote safe driving in the St. Louis metropolitan area. Three public events are planned to provide driver educational outreach to citizens of St. Louis. EWGCOG plans to assess and critique its safety program that involves the three “E’s” in December 2004 to determine what has and has not been accomplished, and to prepare for activities in 2005.

Modeling Capability

EWGCOG’s Transportation Planning Department, specifically the five-member Systems Evaluation Section, is responsible for maintaining and updating travel data sets, networks, and model components. Two technical committees the Transportation Planning Committee and the Inter-Agency Consultation Group review planning assumptions and forecasting methods.

East-West Gateway currently uses the CUBE model platform for both highway and transit modeling. The socioeconomic data is stratified into 1,066 traffic analysis zones. The highway network contains over 13,000 links, of which nearly 5,000 connect zone centroids within the modeled network. The modeled network represents approximately 24% of the 14,000 miles of roadway in the metropolitan area. The model is a standard 4-step modeling procedure, which is: trip generation, trip distribution, mode split and highway assignment.

EWGCOG is currently undertaking a major update of its travel demand model. Several data collection efforts have been completed to update model components and estimation, calibration, and validation data sets. A roadway inventory, major household travel survey, on-board passenger survey, and a speed and delay study, are some of the activities that were performed to retrieve accurate information for the model update. PB Consulting is under contract to assist EWGCOG staff in the estimation, calibration, and final validation of a new multi-modal, trip-based travel
demand model. In addition, three major transportation investment alternative analysis studies, the Gateway Connector Phase I Study, the Madison County MetroLink Feasibility Study, and the Metro South Alternatives Analysis Study are currently underway.

EWGCOG has a Geographic Information Systems (GIS) section within the Planning and Information Systems Department that consists of a staff of three. The staff focuses on maintaining, developing, and expanding the GIS capabilities of the agency. In addition to the GIS section, each department within EWGCOG has staff with GIS skills.

Efforts such as maintaining data directories with layers of spatial data, acquiring additional spatial data to support agency initiatives or requests, creating project-specific GIS applications, providing technical support and assessing GIS needs, have enhanced regional productivity and regional collaboration. Staff is currently training in ArcGIS 9, which will add a comprehensive geoprocessing framework and toolkit for creating and executing complex GIS procedures.

EWGCOG was involved in a number of 2000 Census activities in conjunction with its transportation model update work activity which are summarized as follows:

**Definition of Transportation Analysis Zones** – the definition process involved collaboration of EWGCC staff with Census Bureau staff to ensure zone conformance to Bureau-acceptable boundary criteria.

**Enhancement of Census Bureau’s Employer Database** – EWGCC staff assistance was provided to improve the Census Bureau’s database for workplace employment tabulation and geocoding.

**Local Assistance** – EWGCOG staff assisted local governments in the acquisition and application of early 2000 census data releases for various needs, including redistricting efforts.

**Data Dissemination** – Staff prepared and disseminated monographs – via the agency’s web page, from 2000 census data.

**Census Transportation Planning Package Delivery** – EWGCOG reviewed preliminary releases of 2000 census data for conformity with other census products.

**Intelligent Transportation Systems (ITS)**

Gateway Guide, the St. Louis Metro area’s intelligent transportation program, is currently serving as the umbrella program for regional transportation operation’s collaboration/cooperation in the St. Louis metropolitan area and the surrounding two-state region. The program provides real-time traffic information to motorists, thereby allowing motorists to make an informed decision on the best route to travel. The program is a regional partnership between MoDOT, IDOT, EWGCC and the area transit agency, Metro. Collaboration and cooperation on this program is being accomplished through a formally established multi-jurisdictional steering committee. The EWGCOG recognizes the value of the Gateway Guide program for improving incident management. However, they acknowledge that to date, there has been limited involvement of local
public agencies (LPAs) in the Gateway Guide delivery effort. EWGCOG recognizes the opportunity they have to enhance the delivery and effectiveness of the Gateway Guide effort through direct involvement and outreach activities to LPAs. ITS Regional Architecture is under development with participation from IDOT, MoDOT, EWGCOG and other regional stakeholders and EWGCC plans to complete this development by the April 2005 federal deadline. This architecture will identify existing and planned ITS systems. Turbo Architecture was purchased and existing database information from Tiers I and II workshops is being prepared. ITS projects have already been implemented in the region, or are planned. These projects are related to freeway management or are related to transit or arterial management.

MoDOT has contracted with Transcor and IDOT has contracted with Edwards and Kelsey. Both consultants have been asked to develop Regional Architectures for the respective states. MoDOT is developing the Regional Architecture for the Missouri side of St. Louis region and also large areas of the Illinois side. MoDOT's final draft of the Regional Architecture is complete with the exception of necessary information that is needed from the City of St. Louis. The City of St. Louis is considered to be a mid-level regional partner. The goal of MoDOT and EWGCOG is that the final Regional Architecture product includes the City of St. Louis as a component. The lack of the City of St. Louis inclusion could effect the City's ability to utilize Federal funds for certain types of projects after April 2005. Both MoDOT and EWGCOG have made the importance of the City's inclusion in the Regional Architecture clear to the City of St. Louis. MoDOT will submit their final Regional Architecture draft, hopefully with City information, to IDOT and their consultant for their review and finalization.

The Review found that EWGCOG has been an involved stakeholder throughout the Regional Architecture development process. EWGCOG’s ITS plans are outlined in the FY-2005 UPWP and indicate that an ITS integration strategy for future investment decisions will be developed from Regional Architecture. These activities will be coordinated between agencies, local officials and regional stakeholders. Integration strategy will also be used in the transportation planning processes. Funding for planning ITS integration is part of the LRTP and will be incorporated. The Regional Architecture and integration strategy will continuously be updated to maintain currency and effectiveness.

In addition, EWGCOG has helped MoDOT to convey the message to the City of St. Louis that the City's involvement is critical. EWGCOG clearly understands their future role as the agency responsible for maintaining the Regional Architecture. MoDOT and IDOT are committed to achieving the goal of integration of the Regional Architecture for entire St. Louis metropolitan planning area into the IDOT and MoDOT plans by April 8, 2005.

**Land Use/Growth Issues**

EWGCOG has made the decision to be active in the regional discourse about growth through the policies of the LRTP, development of the Blueprint Model, efforts of examining the effects of tax subsidies, local government taxes and expenditures and associated activities of the UPWP.
EWGCOG links transportation and land use through an initiative entitled “Blueprint for Sustainable Futures for the Gateway Region.” In 2003, a partnership was developed with the State of Illinois and the University of Illinois Urbana-Champaign, to develop a land use model for the St. Louis region based on the Land Use Evolution and Assessment Model (LEAM). This model, which EWGCOG calls the “Blueprint Model,” is being developed to address a range of issues including impacts of transportation projects on regional growth, fiscal and employment impacts of such projects, and alternative growth scenarios. The first stage of the Blueprint Model will be completed in 2004. This transportation and land use planning activity has thus far elevated interest among local planners, economic development specialists, and citizen organizations. An advisory group will continue to provide input to this land use modeling effort. When complete, EWGCC anticipates that the model will be a useful tool for both assisting in long-range planning and attaining citizen engagement in the development phase.

Although there is no regional land use plan, EWGCOG maintains land use data that represents the region’s existing development patterns and indicates future direction from the data base that is used for land-use allocation modeling. This land use data also provides input into the transportation planning process as land use projections and sub county land use allocations are developed in consultation with local planning officials.

Urban sprawl is an issue in the St. Louis metropolitan area as with many metro areas in the Midwest. Planning and zoning is locally controlled which limits a region-wide ability to manage growth and development in a more coordinated manner. Although a state- or region-wide growth management plan is not in the immediate future discussion has been occurring at the state level in Missouri and in Illinois about coordinated and cooperative growth management planning.

Corridor preservation study initiatives have taken place in the region, which include rail corridors that could be used for bicycle facilities or future Metro expansion (Madison County), and the “Gateway Connector” (IL 158 – Columbia to Troy).

EWGCOG does not have Access Management Plan for the St. Louis Metropolitan planning area. It does have an Access Management Guideline that is used in connection with access management reconstruction projects, permitting for large development and planning and zoning reviews. EWGCOG believes that there may be value in its outreach effort to educate public agencies about the benefits of Comprehensive Access Management in the region through the sponsoring of workshops. EWGCOG is also considering another possible way to promote effective access management, which would be to include access management as a weighted factor such as an Urban Arterial Design Template, in EWGCOG’s TIP development process.

MoDOT recently adopted a Comprehensive Access Management Plan and is committed to designing new street and highway projects to meet the access management plan’s standards. MoDOT has identified crucial corridors (e.g. Manchester Rd, Olive/Clarkson, Rte 340 etc.) for access management in the St. Louis metropolitan area, however, MoDOT, has not yet developed and implemented “stand-alone” access management projects. IDOT does not have a Statewide Comprehensive Access Management Plan. However, some of IDOT’s districts are active in corridor management.
EWGCOG received an US EPA grant in 2002 to develop a Brownfields/Open Space Initiative. EWGCOG’s study team worked to identify Brownfields areas in ten inner ring suburbs as well as in the City of St. Louis and the City of East St. Louis. Through this project an understanding was gained on the importance of Brownfields issues for communities that are working on recreational and economic developments while overcoming crucial barriers. Documents produced from this project are available on EWGCOG’s website. EWGCOG staff is organizing and moderating a panel of experts for the 2004 National Brownfields Conference in St. Louis. The panel will discuss regional modeling and the role of Brownfields redevelopment in urban land use transformation.

**Congestion Management System (CMS)**

EWGCOG’s development of CMS is guided by the following goal: “To improve the accessibility and the mobility of persons and goods within the regional transportation system by assessing the existing and future impact of traffic congestion and implementing successful measures and techniques necessary for effective mitigation.” CMS components are being accomplished as part of the continuous, comprehensive and cooperative transportation process. The EWGCOG tracks congestion but does not view congestion as a major problem. Areas of congestion appear to be shifting rather than increasing. CMS strategies that are currently implemented include transportation demand measurement (TDM) measures, traffic operational improvements, public transit capital improvements, public transit operations improvements, bicycle and pedestrian improvements, access management strategies, incident management, and ITS.

CMS strategies are examined in all corridor studies and are a requirement for capacity-adding projects that are advanced to the TIP. Interaction with cooperating agencies is project- or strategy-specific. EWGCOG has a Congestion Management handbook that includes strategies for relieving congestion. The handbook is used during corridor studies to explore a variety of alternatives for improving mobility. Interaction with cooperating agencies is project or strategy specific. Any major capacity adding project that is proposed for federal funding in the TIP must demonstrate in a CMS report that alternative strategies for alleviating congestion and enhancing mobility have been considered in accordance with the Congestion Management Handbook. If a report is not complete at the time of application for inclusion in the TIP, the project is not considered. The handbook has not been updated since 1997 and it is out of date on some topics. For example, the handbook does not mention the MoDOT Statewide Comprehensive Access Management Plan. EWGCOG, however, has not had a reason to update the handbook because they do not believe that congestion is a problem in the planning region.

EWGCOG developed performance measures for assessing the condition of the monitoring system network. Performance measures include: volume-to-capacity ratio; vehicle density; vehicle speed; vehicles miles of travel; transit system peak load factor; park-and-ride lot utilization. Performance objectives are accomplished by the following activities: EWGCOG/MoDOT/IDOT aerial surveys; MoDOT and IDOT travel time runs; MoDOT and IDOT ITS activities; state and local traffic count programs; state and local loop detector systems; transit agency monitoring programs; EWGCOG travel demand model; MoDOT Enterprise database system, and IDOT Illinois Roadway Information System. In addition to these performance measurements, IDOT and MoDOT review
accident reports to assess whether implemented projects have improved safety. Metro evaluates the impact of system changes and major improvements such as the MetroLink. EWGCOG also develops a “state of the system” report as part of the development of the LRTP.

Title VI/Environmental Justice/ADA

The geographic distribution of transportation investments and pavement and bridge conditions and safety characteristics with reference to minority and low-income communities are examined in the LRTP. In 1994, EWGCOG adopted a regional goal to preserve the existing transportation system, and with that adoption made the commitment to improve mobility and economic vitality in the older urban areas of the region where approximately 80 percent of the region’s minority population resides. This was a meaningful policy shift that has led EWGCOG to actively be involved in supporting improved access to jobs. In 1996, EWGCOG launched an initiative entitled “Pathways to Construction Careers” which was a pre-apprenticeship training program for construction jobs. This program has been transferred to the Construction Prep Center, which EWGCOG helped to form and remains actively engaged in operating.

Racial disparity concerning socio-economic indicators and variables including housing, health, income, and access to employment in the St. Louis metropolitan area has been a focal point of work activities for EWGCC for several years. EWGCOG staff has made numerous public presentations on the “Where We Stand” strategic analysis that discusses the indicators of disparity that include educational attainment, housing, health and more. Transportation access or lack of access is related to all these indicators.

EWGCOG is currently involved in three regional initiatives to improve transportation access to employment opportunities for low income and minority populations: the St. Louis Regional Jobs Initiative; the Regional Strategy for Access to Jobs; and Bridges to Work. In addition, EWGCOG uses their staff engagement with citizens to identify transportation needs. As part of this initiative, the MPO plans to launch a “We’re Listening Tour” in the near future. Under this work activity, staff will conduct interviews in public locations and engage in dialogue residents living in minority and low-income neighborhoods. An interview protocol and questionnaire are currently being developed.

All Title VI complaints are to be directed to the Director of Administration who will notify the appropriate outside Agencies, the Council’s Executive Director and the appropriate Department Director of the complaint. The council prepares a written response for each complaint with a response to the appropriate Agency as well. The Council will make every effort to implement corrective action if required. Since the previous Certification Review in 2001 there has been a Title VI complaint concerning EWGCC’s transportation planning process. The complaint was handled in accordance to the procedures previously discussed and it was determined that the transportation planning process had been correctly administered by EWGCC. EWGCOG requests that FHWA and FTA communicate with EWGCOG from the start to finish of the complaint handling process and provide EWGCOG a copy of all Federal Agency responses to complaints, as allowed by law.
Using Census 2000 demographic and socio-economic data, minority and low income communities were identified using the following criteria: if a block group had a minority population that exceeded the regional average of 24%; if a block group had a number of low-income households that exceeded the regional average of 5%, and if a block group had either zero vehicle households or disabled populations that exceeded that regional averages which were 5% and 14% respectively. Based on this data, two reports have been initiated by EWGCOG entitled, “The State of the System,” and “The Geography of Opportunity.” In addition, demographic profiles of the St. Louis metropolitan area are available on the EWGCOG web site.

During corridor and LRTP planning processes, extra effort is taken by EWGCC to reach out to minority and low-income areas. EWGCOG uses GIS-based analytical techniques to assess the distribution of impacts of transportation investment to minority and low-income neighborhoods. These impact assessments include accessibility/mobility indicators, preservation needs, safety conditions, physical impacts, and investment patterns.

EWGCOG has become increasingly involved in Americans with Disabilities Act (ADA) issues in recent years. Disabled persons are concerned with pedestrian access and safety in intersections and public right of ways. In response to dialogue with the disable community, EWGCOG convened a meeting of public works through St. Louis City and County to review the status of ADA regulations and guidelines. EWGCOG also arranged for a panel of persons with disabilities to participate in the TIP project development workshop (January 2004). As part of the LRTP update, EWGCOG contracted with the Starkloff Disability Institute to develop and implement a process to ensure that transportation needs, perspectives and priorities of persons with disabilities are considered in the plan update.

In other ADA initiatives, EWGCC staff recently prepared a publication entitled, “St. Louis Regional Accessibility: Supporting Full Community Participation.” Staff has also been vocal in the community about the importance of ADA compliance in privately owned capital projects that are built with public tax incentives.

**Public Involvement**

Since the adoption of the “Transportation Redefined” Long Range Transportation Plan ten years ago, EWGCOG has researched and tested a variety of activities and techniques to attain citizen input in transportation planning. There are three general categories of initiatives in EWGCOG’s Public Involvement Plan, which are communication, consultation, and cooperation in planning. In 2004, a fourth “c” was added to the public involvement plan: community-based outreach. This category targets the most difficult to reach groups such as minority population groups, low-income persons, persons with disabilities and the elderly population. Recently, a revised “Strategy to Engage Citizens in Regional Problem-Solving” was presented to the EAC and the Board in June 2004. This strategy is a cooperative, interdepartmental process that involves staff of the Transportation, Planning, and Policy/Community Development Departments.

Comments from citizens on the transportation planning process in the St. Louis metropolitan area are addressed by EWGCC staff, the EAC and the Board. Phone calls, e-mails, and other
correspondence from citizens are responded to as promptly as possible by EWGCOG staff. In addition to receiving comments from the public on general transportation issues, the public is also invited to be engaged in the planning process for specific transportation studies including major corridor studies. EWGCOG also works with the region’s two major Chambers of Commerce/economic development agencies.

**Conformity and Air Quality Planning**

The entire eight county St. Louis region (Missouri-Illinois) has attained the 1-hour ozone standard and has been classified as a maintenance area. On June 15, 2004 the U.S. Environmental Protection Agency (U.S. EPA) designated the eight county St. Louis region and Jersey County, Illinois, as an 8-hour ozone standard non-attainment area, which has until 2010 to show attainment for this standard. Part of the region, the City of St. Louis and that section of St. Louis County within I-270 are classified as a limited maintenance area for carbon monoxide. The St. Louis region is in attainment for all other air pollutants.

The boundary of the St. Louis 1-hour ozone maintenance area is the same as the MPO planning area boundary. The 8-hour ozone non-attainment area extends to Jersey County, Illinois, and is not within the MPO planning area boundaries; however, no adjustments to the network model will be necessary to account for this difference.

The Illinois Environmental Protection Agency (IEPA) and the Missouri Department of Natural Resources (MDNR) have initiated the State Implementation Plan (SIP) developmental process for the 8-hour ozone standard. In June 2004, IEPA, MDNR, and EWGCOG met to develop a modeling protocol that will be used for preparing the Attainment Demonstration SIP for each state and delineate roles/responsibilities for the participating agencies. EWGCOG is responsible for the transportation portion of the SIP.

IEPA operates six ozone emission monitors in the Illinois portion and MDNR operates three ozone emissions monitors in the Missouri portion of the St. Louis region. Under a delegation agreements with MDNR, the Air Pollution Control Program of the St. Louis County Department of Health operates an additional five ozone emissions monitors and the Air Pollution Control Program of the City of St. Louis Department of Health operates three ozone emissions monitors.

EWGCOG acts as a clearinghouse for ozone information collected by the above network of monitors. Participating agencies transmit information to EWGCOG and the information is examined for missing values, problems, exceedances of the one-hour ozone standard, excursions of the eight-hour ozone standard, and maximum eight-hour ozone average by monitors. The ozone data is then entered onto an electronic spreadsheet program and shared with federal, state and local entities.

Interagency consultation occurs throughout the conformity determination process. The procedures are delineated in the Missouri Transportation/Air Quality Conformity SIP and the federal conformity rule. The primary mechanism is the Inter Agency Consultation Group (IACG), which meets on a monthly basis that insures timely participation and coordination by all partner agencies.
The IACG is composed of representatives from: EWGCC, Chair of Group; MDNR; IEPA; MoDOT; IDOT; U.S. EPA Regions V and VII; FHWA (Missouri and Illinois); FTA Region VII; St. Louis County Air Pollution Control Program; City of St. Louis Air Pollution Control Program; St. Louis County Highways and Traffic Department; Madison County Highway Department; St. Clair County Department of Roads and Bridges; the Metro; Madison County Transit District; and St. Clair County Transit District. Items discussed during the conformity determination process include planning assumptions, tests to be performed as part of conformity determination, emissions budgets, pending SIPs, pending federal legislation, and review and comment on conformity determination.

Public consultation for the conformity determination occurs in conjunction with the public review and comment period for the TIP and/or the LRTP. The conformity determination report is mailed to air quality consultees and is posted on the EWGCC web site. Copies of the report are also available at the TIP and Air Quality Conformity Determination Open Houses held through the St. Louis region. The Air Quality Conformity Determination has a 30-day review and comment period. In addition the Air Quality Advisory Committee, which meets monthly, has an active public participation role in overseeing the development of the Conformity Determination.

There have been minor differences in vehicle miles traveled (VMT) estimates used in conformity and the traffic volume estimates generated by the Highway Performance Monitoring System (HPMS). However, enhancements to the local HPMS and increased coordination among partner agencies have minimized these differences. An ad-hoc VMT working group, consisting of representatives from the MoDOT, MDNR and EWGCC, has periodically met to resolve the differences in VMT from HPMS and on-ground monitoring. Also, the IACG has an active role in maintaining quality control and consistency in all aspects of mobile source data collection.

For projects that are incidental to the development and use of land in a manner consistent with the population and employment forecasts, the VMT resulting from the project and resulting emissions are already represented in the network analysis through the estimation of centroid connector and intra-zonal VMT and no further analysis is required. However, when non-exempt projects are subject to supplementary emissions adjustment, the regulations require that emissions from projects which are not regionally significant, but which have an effect on vehicle travel, should be estimated in accordance with reasonable professional practice. Since these projects vary widely in scope and potential impact on travel and emissions, a number of different approaches have been identified. In all cases, having determined the effect on VMT, the resulting emissions are computed using the “Off-Net” model software developed in 1998 for use in the St. Louis region by Cambridge Systematics.

As part of the conformity process, EWGCC has to certify that Transportation Control Measures (TCMs) in the categories included in the 15 Percent Rate-of-Progress SIPs which are eligible for federal funding, are on schedule for implementation and that no federal funds are being diverted from these projects which might delay their timely implementation. The basis for this certification is contained in the 1997 report, Transportation Control Measures in the St. Louis Region: Completion Report. All projects contained in TIP are routinely tracked as part of the reasonable progress process, and some TCMs are carried over. TCM schedule changes are accounted for in the conformity finding. Transportation projects that have been implemented on a regional scale
(i.e., enhanced vehicle inspection and maintenance program, MetroLink, bus replacements) have produced the greatest air quality benefits in the St. Louis area.

**Other Issues:**

Housing - EWGCOG participates in regional efforts led by other groups to promote and improve affordable housing, homeownership among first-time buyers, lead paint removal, and to discourage predatory lending.

“Welfare to Work” and “Access to Jobs”- (discussed in part under Title VI/Environmental Justice) - EWGCOG is closely involved with the workforce development of welfare to work activities in the region.

The “Regional Strategy for Access to Jobs,” has core elements, which EWGCOG refers to as the “LEARN+WORK LINK,” as it focuses on improved access to education, job training, and work opportunities along the MetroLink light rail and integrated MetroBus service. EWGCOG has developed working relationships with more than 20 businesses, educational, human service, and transportation agencies for the purpose of building and implementing this strategy. The projects that EWGCC has jointly developed and funded with federal transportation and matching dollars which involve several different implementing agencies to carry out “LEARN+WORK LINK” include the following:

- Cooperative Healthcare Employee Transportation (CHET) service from the Hanley Road MetroLink station and Florissant Valley Community College to employment at St. John’s Mercy Medical Center.
- Bridges to Work service from the Hanley Road MetroLink station to the Earth City Business Park, Harrah’s Casino, and other destinations in Maryland Heights
- Chesterfield Connector Service from the Ballas Road Transfer Center to jobs in Chesterfield Valley
- Special late night and weekend service on six Metro routes in underserved areas of the City of St. Louis and St. Louis County
- Evening and weekend service for persons with developmental disabilities to job sites in Madison and St. Clair counties
- Reverse commute service from downtown St. Louis to three employment activity centers in Madison County, Illinois
- “Travel training” for persons with disabilities that are learning to use regular fixed route service
- Evening transit service to and from job training classes at a local college
- Transportation to and from training classes and jobs from eight church parking lots in the City of St. Louis.

“LEARN+WORK LINK” expansion plans include service to and from a location near the International Institute in south St. Louis City, transportation to the Sauget Business Park in St. Clair County, and service for low-income workers in Monroe County, Illinois, which has extremely limited existing service.

Under the Transportation Community and System Preservation Pilot (TCSP) program, EWGCOG and four local governments have received TCSP grants. There was early interest by EWGCC in
the National Corridor Planning and Development Program relative to improvements to the national “Avenue of the Saints Highway” but that interest subsided when the St. Louis region was not awarded a TCSP grant from FHWA. There are no immediate plans by EWGCC to seek additional funding under the TCSP program.
DISPOSITION OF ACTION ITEMS FROM THE 2001 CERTIFICATION REVIEW

1. State Department of Transportation Coordination - There are two areas where improvements in coordination on the part of the state Departments of Transportation could result in a more effective transportation planning process for the St. Louis urbanized area. The two instances are as follows:

Timing of the Missouri Department of Transportation’s submission of projects for the Transportation Improvement Program (TIP) does not currently give the MPO adequate time for review. We recommend that MoDOT re-evaluate its current scheduling procedures to see if there is a way to alleviate the time constraint problem.

The review team has observed progress towards improvement in this planning coordination effort since the 2001 review. EWGCOG continues to recognize the project submittal process followed by IDOT as effective, while expressing the need for continued improvement in the MoDOT process.

The MPO has an active agreement with the Missouri DOT for performing corridor studies/alternative analysis (MTIAs) that has worked very successfully for almost a decade. No such agreement exists between Illinois Department of Transportation and the MPO. We recommend that IDOT consider development of such an agreement with the MPO so that coordination of major studies occurs more consistently. However, IDOT advises that they (IDOT) will continue to work with EWGCC as their partner on a project-by-project basis. IDOT believes that with the limited number of MTIAs in the Illinois portion of the St. Louis metropolitan area, that this arrangement has worked satisfactorily and that IDOT will continue to partner with EWGCC in this manner, that is, without such an agreement.

To date no effort has been made by EWGCOG and IDOT to develop a formal written agreement between agencies for the purpose of outlining the agreed upon process for completing a major investment study (MIS) in connection with Illinois projects. The continued absence of such an agreement has not impeded the effectiveness of coordination and cooperation between subject agencies in the limited occurrences when an MIS is completed for project located in the Illinois portion of the St. Louis metropolitan area. As such, the current review team no longer considers this FY 2001 recommendation to be an issue.

The review team encourages EWGCOG, MoDOT and IDOT to partner together for the purpose of assessing what is currently happening in the transition from planning study (MIS) to NEPA documentation and identify ways to make the transition seamless, and ensuring that planning information and products move into formal NEPA documents in a manner that avoids duplication and strengthens partnerships and decision making.


2. PL Funding Balance - Currently, EWGCC has a large balance of Missouri PL funds, which have accumulated. The EWGCC is encouraged to utilize these funds for needed projects, and as appropriate make the funds available to other local implementing jurisdictions, such as the Bi-State Development Agency, to conduct additional planning activities. The EWGCC is reminded that there may be the opportunity for soft-match of various planning type activities, which utilize funds other than Federal funds. It should also be noted that current spending patterns are taken in to consideration as Congress develops programs for reauthorization. Unobligated balances create the impression that the money is not needed.

In FY2003 MoDOT, in consultation with MPOs, FHWA, and FHWA, revised their MPO PL Fund Allocation formula to become effective with the FY 2004 apportionment. The final funding formula improvement during the MPO work sessions gave consideration to a consolidated planning grant. Several additional policy changes were developed during the course of meetings with MPOs including policies relating to accumulation and redistribution of PL balances and in-kind match provided by MoDOT.

MoDOT has been allocating metropolitan planning funds to MPOs since 1974. MPOs will be permitted to keep balances of these funds accumulated from previous years. Current balances must be spent within a five-year period, or they will be redistributed to all MPOs. Under the revised formula, future balances exceeding 1.5 times the yearly allocation will be redistributed after five years based on relative populations. The five-year time frame was selected to allow MPOs to accumulate funds for larger projects such as their long-range plans every five years.

The MoDOT’s new policy calls for work performed by MoDOT planning staff in Districts that have MPOs to be funded with state road funds. The work performed by District 6 planning staff can than be used by the EWGCOG as in-kind match for their planning funds. MoDOT previously sought federal reimbursement for these salaries through the State Planning and Research Program (SPR). However, the value of activities eligible for SPR reimbursement far exceeds the level of SPR funding. Therefore, MoDOT will not lose any federal reimbursement with this policy change. This policy will continue until the MoDOT staff’s annual evaluation of the policy determines that the in-kind match is needed or SPR reimbursement for planning salaries is needed to maximize available funding for MoDOT. This is likely to occur if Missouri receives a large influx of federal transportation dollars.

These cooperatively developed policy changes promote the importance of EWGCOG’s timely, effective and maximum utilization of PL funds in their planning region.

3. Modeling - The effort to improve the travel demand model should continue. We particularly encourage the MPO and transportation project sponsors to work together to refine the model so that improved outputs will be useful and enhance developing decisions associated with specific transportation projects, including development of FTA required New Starts Criteria associated with New Fixed Guideway projects.

Substantial improvements in the EWGCOG’s modeling efforts have occurred since the last review. EWGCOG is currently undertaking a major update of its travel demand model.
4. Public Involvement Process - The MPO’s public involvement process was adopted as part of the update of *Transportation Redefined*. Although the MPO has developed a very extensive public involvement process and received much feedback from many members of the public there are some improvements that can be made as the use of the process involves insuring that the process is more effective. It was noted during the public session of the on-site portion of the Planning Certification Review that some members of the public that participate in the public involvement process have expectations that they did not feel had been met by the process. It is recommended that EWGCC consider the following:

Create a mechanism that clearly describes how public comments will be considered during the planning process and how comments will be addressed (such as a specific written response, group responses, listed on the web site, etc.)

A revised “Strategy to Engage Citizens in Regional Problem-Solving” developed and approved by the Board of Directors in September 2004. This strategy is a cooperative, interdepartmental process that involves staff of the Transportation, Planning, and Policy/Community Development Departments.

Consider development of performance measures to help EWGCC determine the effectiveness of its public involvement process.

A section of the new “Strategy to Engage Citizens in Regional Problem-Solving” covers the evaluation of the citizen’s engagement process. Provides for a collection of data that will be useful in developing performance measures.

Ensure that any public material emphasize the availability of products of the process in accessible formats upon request.

The “Strategy to Engage Citizens in Regional Problem-Solving” states that EWGCOG will make information available to the public regarding plans and project development through its two regular publications; Gateways (a weekly news sheet distributed by mail and hand-out) and Local Government Briefings (a weekly news sheet distributed by e-mail and fax). Any individual who asks to be placed on the distribution lists is accommodated. The communication section of the strategy outlines other forms of communication tools to support citizen engagement.

Consider the need for providing multi-lingual public material to those identified population groups, which do not have English as a primary language.

EWGCOG has utilized International Institute Group as a broker of EWGCOG’s relationship with non-English speaking public.

5. Environmental Justice – The MPO has done an excellent job in data collection and analysis associated with insuring that Environmental Justice considerations are incorporated into the
planning process. The MPO and member jurisdictions are encouraged to continue this effort as well as develop performance measures to help determine the effectiveness of data collection and community outreach activities.

During corridor and LRTP planning processes, extra effort is taken by EWGCC to reach out to minority and low-income areas. EWGCOG uses GIS-based analytical techniques to assess the distribution of impacts of transportation investment to minority and low-income neighborhoods. These impact assessments include accessibility/mobility indicators, preservation needs, safety conditions, physical impacts, and investment patterns. The “Strategy to Engage Citizens in Regional Problem-Solving” includes a Community-Based Outreach section that identifies EWGCOG’s commitment to addressing the needs of groups of citizen’s who have historically been under-served by regional system.

EWGCOG is continuing to collect and analyze data, however, it is noted that the data collection process takes more than 3 years to complete.

There are currently no performance measures in place. The “Strategy to Engage Citizens in Regional Problem-Solving” does require on an annual basis that the staff prepare a narrative report describing the way and extent to which citizens have impacted plan and project development. Staff will make a report to the Board and the community at the end of each fiscal year. The report will be available on the EWGCOG web site and in hard copy.

6. Freight Issues - Although EWGCC has performed analyses on freight issues in the past, it is recommended that EWGCOG re-examine goods movement within the metropolitan area and integrate the results into the planning process.

EWGCOG continues to center little of their planning efforts into the task of integrating freight movement into the region’s transportation planning process. Previously, EWGCOG had a Freight Advisory Committee but it has ceased to function. There are relatively few funds spent on freight projects. Considering that St. Louis is the 16th largest metropolitan area in the country with significant highway rail and waterway freight movement, the review team continues to recommend the need for EWGCOG to place a greater emphasis on this topic. The National Highway Institute (NHI) has recently developed courses on integrating freight into the planning process that might help rekindle interest in this area.

7. Annual Listing of Projects – An annual listing of projects for which Federal funds have been obligated in the preceding year is required by TEA-21 to be published or otherwise made available by the MPO for public review. This listing has not been and should be made readily available from EWGCC. Placement of the annual listing on the MPO’s website, within the updated TIP, or otherwise for meaningful public notice would be appropriate.

An annual listing of projects for which Federal funds have been obligated in the preceding year is currently being shown in the EWGCOG’s TIP.
2004 CERTIFICATION REVIEW FINDINGS

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

Key Definitions:

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

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

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

CORRECTIVE ACTIONS

NONE

RECOMMENDATIONS:

1. The existing 1972 MOU between the EWGCOG, MoDOT and IDOT for the purpose of insuring continuity in the comprehensive and coordinated urban transportation planning process for the St. Louis Metropolitan Region does not meet the requirements of 23 CFR 450.310 (a). These principals in the metropolitan planning process are directed to realize cooperative planning agreement(s) consistent with 23 CFR 450.310 on or before December 1, 2005. We encourage, to the extent practical, that these entities engage in one agreement outlining their respective roles and responsibilities within a cooperative planning process. However, the fact that a recently updated new MOU between EWGCOG and MoDOT is in place opens up the possibility of a new and separate agreement being developed by EWGCOG and IDOT. Though not an approach preferred by the team, it represents an agreement scenario that may still satisfy regulatory “agreement” requirements while ensuring that the EWGCOG, MoDOT and IDOT planning and programming processes will be carried out in a comprehensive, cooperative and coordinated manner. The absence of an executed agreement that includes IDOT, within the time frame and fashion called for in this recommendation, will result in the review team withdrawing this finding as a recommendation and re-issuing a corrective action.
2. To ensure adherence with Federal requirements given under 23CFR Part 420.111 relative to showing cost estimates for each work activity and for the purpose of providing complete information to the public, EWGCOG needs to have the UPWP illustrate cost estimates and/or staff hours dedicated to major work activities that appear in the current UPWP document format as lettered headings within a coded and more broad work element.

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

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

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

6. In the 2001 Certification Review report the FHWA/FTA review team included a “Recommendation” that MoDOT re-evaluate its current scheduling procedures in order that MoDOT submit their projects on a timely basis for inclusion in EWGCOG’s draft TIP. During this Certification Review, we found that MoDOT has made progress in submitting their projects to EWGCOG on a timely basis. Our recommendation from the 2001 Certification Review continue with the expectation that MoDOTs improves its project scheduling procedures by the next TIP development cycle.

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

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

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

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

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

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

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

COMMENDATIONS:

1. EWGCOG’s is commended for its adoption and successful implementation of a Reasonable Progress Policy. The Reasonable Progress Policy was adopted to ensure the efficient use of limited Federal funds available to the St. Louis region. Prior to the policy’s adoption, the lack of progress in developing and implementing projects using Federal funds led to significant project delays and created financial risks for both local and state transportation programs. Over the past three years the Board of Director’s enforcement of the Reasonable Progress Policy has reduced the backlog of unobligated balances from more than $108 million to zero at the end of Federal fiscal year 2004. We encourage EWGCOG to revisit and continue to improve the Reasonable Progress Policy to ensure its efficiency and fairness.

2. EWGCOG is commended for its recent transportation safety planning accomplishments including: the completion of a detailed analysis completed in 2003 of the primary causes of accidents in metro St. Louis and a comprehensive review of safety related statistics and transportation safety measures adopted by state governments nationwide; and establishing the Regional Transportation Safety Initiative effort in 2004 which is centered on community engagement and outreach activities focused around education, enforcement and emergency response.
3. EWGCOG has a very comprehensive and user-friendly web site that is a repository of reports and information of regional significance.

4. EWGCOG and MoDOT are commended for attempting to coordinate security concerns like emergency medical care through traffic control centers. If this coordination proves effective, this initiative might be a “best practice” work activity that other MPOs may wish to replicate.

5. EWGCOG is recognized for making a great effort to address Homeland Security initiatives in the St. Louis metropolitan area. The development of the St. Louis Area Regional Response System (STARRS) is one of the outcomes from this effort. In addition, EWGCOG is holding meetings to complement their traditional engineering approach (enforcement, emergency response, and education) with security planning and engineering.

6. EWGCOG’s is commended for its involvement in the 2000 US Census.

7. The Blueprint/LEAM initiative will be a useful tool for EWGCOG in the future as land and growth initiatives are introduced and initiated in the St. Louis metropolitan area.

8. The fourth “C” that was added to the public involvement plan in 2004, “Community Based Outreach,” specifically targets the most difficult to reach groups (low-income, older adults and persons with disabilities). This is a commendable approach for increased public involvement by these groups and by tracking future increased involvement due to this additional emphasis; a “best practice” public involvement approach may result.

9. EWGCOG’s modeling efforts have improved since the previous 2001 Certification Review.

10. The EWGCOG is commended for updating their St. Louis Regional Bicycle and Pedestrian Facilities Plan in 2004. The original 1994 plan focused primarily on recreational bicycle travel in the region’s parks and along the region’s waterways. The updated plan shifts focus to bicycle and pedestrian modes of travel incorporated into the fabric of daily travel patterns, with a stronger presence of bicycle and pedestrian facilities on local streets.

11. EWGCOG, Metro and MODOT are commended for establishing the Transportation Corridor Investment Group (TCIG). The efforts of this multi-agency group have resulted in more effective planning for major capital projects.

12. IDOT and MoDOT are commended for utilization of St. Louis area planning work performed by District planning staff as in-kind match by EWGCOG for federal planning funds.
CERTIFICATION ACTION

In accordance with 23 CFR 450.334, the FHWA and FTA hereby jointly certify the transportation planning process in the St. Louis, Missouri/Illinois metropolitan area for the period December 1, 2004 through November 30, 2007.
APPENDIX A

Acronyms

ADA Americans with Disabilities Act of 1990
CFR Code of Federal Regulations
CMS Congestion Management System
EAC Executive Advisory Committee
EWGCOG East-West Gateway Council of Governments
FHWA Federal Highway Administration
FTA Federal Transit Administration
GIS Geographic Information Systems
HPMS Highway Performance Monitoring System
IACG Inter-Agency Consultation Group
IEPA Illinois Environmental Protection Agency
IDOT Illinois Department of Transportation
ITS Intelligent Transportation Systems
LPA Local Public Agencies
LPA Locally Preferred Alternative
LEAM Land Use Evolution and Assessment Model
LRTP Long-Range Transportation Plan
MDNR Missouri Department of Natural Resources
MoDOT Missouri Department of Transportation
MPA Metropolitan Planning Area
MPO Metropolitan Planning Organization
MOU Memorandum of Understanding
PEA Planning Emphasis Area
SIP State Implementation Plan
TAZ Transportation Analysis Zone
TCIG Transportation Corridor Improvement Group
TCM Transportation Control Measures
TCSP Transportation and Community and System Preservation Pilot Program
TDM Transportation Demand Management
TIP Transportation Improvement Program
TMA Transportation Management Area
UAB Urban Area Boundaries
UPWP Unified Planning Work Program
U.S. DOT United States Department of Transportation
U.S. EPA United States Environmental Protection Agency
UZA Urbanized Area
VMT Vehicle Miles Traveled
APPENDIX B

Certification Review
Questions
(EWGCOG Answers)

FY 2004 FHWA/FTA Certification Review
Responses to Questions
East West Gateway Council of Governments (EWGCOG)
St. Louis Metropolitan Area

EAST WEST GATEWAY COUNCIL OF GOVERNMENTS (EWGCOG)
ORGANIZATION:

1. How are the members chosen for the EWGCOG’s executive and technical functions and what jurisdictions do they represent? What is the committee structure and the responsibilities of each?

   East-West Gateway is a voluntary association of all local governments in an eight county area surrounding St. Louis. This area includes five counties (including the City of St. Louis) in Missouri, and three counties in Illinois. The Board of Directors meets monthly and consists of 14 local elected officials named in the agency’s bylaws as follows:

   Mayor, City of St. Louis
   President, Board of Aldermen, City of St. Louis
   County Executive, St. Louis County
   President, St. Louis County Municipal League
   County Executive, St. Charles County
   Presiding Commissioner, Franklin County
   Presiding Commissioner, Jefferson County
   County Board Chairman, St. Clair County
   County Board Chairman, Madison County
   County Board Chairman, Monroe County
   President, Southwestern Illinois Council of Mayors
   Vice-President, Southwestern Illinois Council of Mayors
   Chairman, Southwestern Illinois Metropolitan Planning Commission
   Mayor, City of East St. Louis
In addition, Board members appoint six citizens. The Chair of Metro is also a member of the Board.

The Board elects officers, including Chair, Vice-Chair and Treasurer, from among its member for one-year terms. The Chair and Vice-Chair must be from different states. The Board has an informal Executive Committee, which consists of the chief local elected official from the eight dues-paying members of the Board and the immediate past Chair.

The Executive Advisory Committee consists of key staff members appointed by each Board member, and selected additional members, representing such agencies as the Regional Chamber and Growth Association, the Metropolitan Sewer District and others. The EAC meets monthly, one week prior to the Board and considers all of the matters that will come before the Board at their meeting the following week.

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

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

The Bicycle and Pedestrian Committee considers matters relating to the region’s investment in bicycle and pedestrian modes.

The Paratransit Advisory Committee, appointed by Board members, considers matters relating to the funding and coordination of the region’s paratransit services.

2. Are all jurisdictions represented? Are all modes represented?

The St. Louis region has nearly 700 units of local government, including about 230 general-purpose units who are members of the Council. The Council meets yearly at an annual meeting. The Board of Directors is broadly representative of county and municipal governments in the entire eight-county area served by East-West Gateway.

3. How is the EWGCOG staff organized and what are its responsibilities?

A staff organization chart is included as Attachment 1. The responsibility of the staff is to advise the Board of Directors on all key decisions. Staff prepares technical and policy analyses to support all recommendations made to the Board of Directors. The staff is organized into four departments, Administration, Planning and Information Systems, Transportation Planning, and Policy and Community Development. Following the passage of the ISTEA, the scope and breadth of staff activities have increased in order to better respond to the broader view of transportation that was the hallmark of that landmark legislation. Our work has become more policy oriented and broader in scope, better reflecting such goals as economic growth and environmental justice.
4. How do planning program work products flow to key decision makers? Is the delegation of authority current?

From East-West Gateway’s perspective, the key decision makers are our Board of Directors, which, as stated, consists of the region’s principal elected local officials. The Board annually approves our UPWP, and staff makes regular presentations and prepares recommendations for adoption to the Board at its monthly meetings.

COOPERATING AGENCIES:

5. Who is the transit operator(s)? What area does it serve? How is it funded?

There are three principal transit agencies in the region: Metro, the Madison County Transit District, and the St. Clair County Transit District. Metro, formerly the Bi-State Development Agency, is the regional transit operator. It operates bus and MetroLink services in St. Louis City and County and St. Clair County, and paratransit (Call-A-Ride) service in St. Louis City and County. Transit services in St. Clair County, including the new MetroLink extension, are operated by Bi-State under a contract with the St. Clair County Transit District. The Madison County Transit District operates its own bus and paratransit system.

Madison and St. Clair County Transit Districts receive local sales tax funds dedicated to transit (1/4 percent in Madison and 3/4 percent in St. Clair) and capital and operating assistance from the State of Illinois. Most of the funds received by the St. Clair district are passed through to Bi-State under the service contract between the two agencies. In Missouri, Bi-State is funded by a ½ percent sales tax in St. Louis City and County that primarily supports operations, and a ¼ percent sales tax in St. Louis City and County that was enacted to support MetroLink expansion. Bi-State receives just over $1 million a year in financial support from the State of Missouri.

6. What is the role and how is the transit operator involved in the EWGCOG’s overall planning and project development process?

Aside from having seats on the Board, EAC, and all the Council’s principal committees, Metro’s major involvement is through its participation on the Transportation Corridor Improvement Group (TCIG) and through procedures outlined in the MOU between the two agencies. The TCIG is a permanent planning group, housed at East-West Gateway, that consists of staff from Bi-State, MoDOT and the Council and which is responsible for overseeing all major planning studies in the Missouri portion of the region.

7. What operations and maintenance responsibilities does the State DOT have within the metropolitan area?

The two state DOTs have full responsibility for the operation and maintenance of the state highway system. Both states also maintain a few miles of non-state roads. Neither state operates or maintains transit facilities, although IDOT does provide significant financial support to the local transit districts.
8. Do interagency agreements between the EWGCOG, State DOTs, and transit operator exist and are such agreements current? Have there been any changes since the previous planning review?

East-West Gateway has formal interagency agreements (Memorandum of Understanding – MOU) with Metro, MoDOT, and the Madison County Transit District (MCT). Discussions are underway with MoDOT to revise the MOU based on the department’s new planning framework, but the agreements with Metro and MCT remain unchanged.

FINANCIAL PLANNING:

9. Does EWGCOG have authority to dedicate/designate future revenue (streams)? Is authority current?

Aside from the Council’s role in programming federal funds and setting priorities in the metropolitan transportation plan, East-West Gateway has no direct authority to dedicate or designate future revenue streams.

10. Are there dedicated sources of funding for local agencies? What innovative financing tools are being used to address new and/or proposed funding?

Most local governments fund transportation through property tax and general fund revenues, and many have enacted capital improvement sales taxes to fund transportation projects. In general, the use of innovative financing by local agencies has been limited. More than twenty transportation development districts have been created, largely by municipalities, to finance projects by using income generated from local assets. Metro has taken advantage of several financing programs to raise cash, and the agency has received a SIB loan from MoDOT. MoDOT also has two innovative financing options that allow local agencies to accelerate projects, based on local agencies funding a much higher share of project costs or on agencies proceeding with a project and receiving reimbursement for project costs in future years.

11. What procedures does EWGCOG follow in administering Federal-aid funds (49 CFR, State, etc)?

The Council monitors expenditures of pass-through funding and requires recipients to provide a copy of the single audit of the organization if the funding threshold is met.

12. MoDOT has recently shown a strong interest in participating in the Interstate Reconstruction and Rehabilitation Pilot Toll Program. What interest does the EWGCOG presently have in such a program and would it be used in their metropolitan area?

The reconstruction of I-70 statewide and the construction of a new Mississippi River Bridge are critical issues to both the state of Missouri and the St. Louis region. East-West Gateway is interested in examining the value of the pilot program and its implications for financing those two major projects.
13. What year was the last single audit performed? Identify all audits, reviews, etc. conducted of EWGCOG during TEA-21 and provide a table showing Federal funds.

The Council has a single audit conducted every year. The field work has been completed for the year ending December 31, 2003. The audit report will be issued in July 2004.

**FEDERAL FUNDS EXPENDED**

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**PLANNING AREA BOUNDARIES:**

14. Have the Federal-aid Urban Area Boundaries (UAB) been changed as a result of the 2000 Census?

Yes.

15. Did the EWGCOG adjust (smooth) the Census defined Urbanized Area (UZA) to include a larger Urbanized Area Boundary (UAB)? If so, explain the cooperative process for which this was carried out.

Yes. Through an iterative process, East-West Gateway, in cooperation with IDOT and MoDOT, modified the UZA to encompass the entire corporate limits of any municipality that the Census identified as partially urban. Adjustments were also made to include major transportation terminals, transit service areas, educational institutions, and airports where necessary to create a contiguous connection to the established UZA.

16. Did the UAB move in at any point around the Urban Area? If so, have other Federal requirements, such as the requirement to effectively control outdoor advertising signs, displays, and devices adjacent to the Interstate and Federal-aid Primary System as it existed on 6/1/91 and which are beyond 660 ft of the right of way and visible from the main traveled (outside of the UAB), been addressed?

The boundary was not moved in.

17. If the UAB has been revised as a result of the new 2000 Census data, has the EWGCOG submitted a revised map to both the FTA and FHWA for their review and approval?

The revised map has received all necessary local and state approvals. IDOT and MoDOT have submitted the map to FHWA for review and approval.

Reviewers’ comment: corrections to the revised map were discussed on-site.
18. Does the EWGCOG maintain a set of functional classification maps?

Yes.

19. Once adjustments to the urban boundaries have been adopted, highways that are impacted by new boundaries must be functionally reclassified. Has it been necessary for EWGCOG to reclassify highways in the MPA? Have the reclassified highways been reviewed and approved by MoDOT and FHWA?

Some reclassification was necessary. IDOT and MoDOT are now reviewing the revised functional classification maps.

20. To what extent do the EWGCOG procedures assure that their functional classification system is developed within the framework of the continuing, comprehensive, and cooperative planning process carried out pursuant to Section 134 of the Title 23 U.S.C.?

Major updates of the functional classification system are made periodically based on a review of changes in travel demand or roadway operations. Last June, East-West Gateway published a revised set of standards and procedures, in full adherence with FHWA directives, for updating the functional classification system, committing to review the entire system every three to five years and setting up processes for minor, bi-annual revisions to the system.

21. Have the Metropolitan Planning Area (MPA) boundaries been changed as a result of the 2000 Census? If so, has the EWGCOG submitted a revised map to both the FTA and FHWA?

The MPA boundary did not change.

22. Does the MPA extend out to the Non-attainment/Maintenance Area Boundary as established by U.S. EPA? (Note: this is not required)

The one-hour maintenance boundary and the MPA boundaries are the same. The eight-hour ozone non-attainment area, however, extends beyond the MPA boundary. Jersey County, Illinois, which is outside the MPA, has been added to the eight-hour ozone non-attainment area.

If the MPA does not extend out to the Non-attainment/Maintenance Area Boundary, is there a formal agreement with the Governors of both Missouri and Illinois, or, how has the Interagency Consultation process addressed conformity in the area between the MPA and the Non-attainment/Maintenance Area Boundary?

On June 15, 2004 U.S. EPA designated the eight county St. Louis region (Missouri-Illinois) and Jersey County, Illinois as an eight-hour ozone standard non-attainment area. Discussions are underway in the Inter-Agency Consultation Group on how to address this issue. Previously, Jersey County was a stand-alone one-hour maintenance area and the Illinois Department of Transportation (IDOT) coordinated all Conformity issues. East-West
Gateway is anticipating using this same approach with the newly established eight-hour non-attainment boundary.

23. If the MPA does not match the Non-attainment/Maintenance Area Boundary, are there interagency agreements (IA) or memorandums of understanding (MOU) identifying planning responsibilities among the MPO, State DOT, public transit operators, air quality agencies, or other agencies involved in the planning process? Please attach any agreements or MOUs that may exist.

The issue is still under consideration (see answer to Question 22).

24. If IAs or MOUs exist:
   Are they final, signed, and in affect?
   Are updates being developed and contemplated?
   How are roles and responsibilities defined?

Roles and responsibilities will be detailed during the inter-agency consultation process. East-West Gateway is proposing that IDOT be the lead agency for conformity issues in Jersey County.

25. If the MPA has been adjusted, how did it affect the way conformity is being modeled?

The MPA has not changed.

26. Did the representation of the Board of Directors make-up change as a result of MPA adjustments? Were there representatives of major modes of transportation added to the Board of Directors?

The MPA has not changed.

27. For the most recent Long Range Transportation Plan (LRTP) update, has there been consideration for expanding the MPA to incorporate the horizon year’s expected urbanized area?

No. Regional growth rates and patterns do not justify an expansion of the MPA at this time.

PLANNING PROGRAM WORK PRODUCTS

Unified Planning Work Program (UPWP):

28. How are major regional transportation needs and policy priorities reflected in the UPWP?

The elements contained in the UPWP respond in various ways to the region’s transportation needs and priorities. Long-range plan elements are used to create broad regional policies and priorities; establish a comprehensive framework for transportation decision-making; define how that framework is employed in planning and programming activities; and ensure that the technical
methods necessary to evaluate the transportation system relative to regional policies, needs, and priorities are in place. Short-range planning elements are used to implement regional policies and policies in a variety of subject areas by researching and identifying needs and potential solutions; creating and sharing information; developing programs and cooperative planning process and supporting implementation activities; and programming funds in a manner consistent with regional priorities. Corridor plan elements focus on the project development process in major transportation corridors or subareas. These elements, in which specific transportation problems are identified and solutions are proposed, provide the link between long-range planning, where the need for corridor improvements are first formally recognized, and project programming, where funds are committed to corridor improvements. Corridor planning projects represent both an output from and an input to the long-range transportation plan. Other elements in the UPWP focus more narrowly on specific community, economic, and environmental effects of the transportation system, especially as the system relates to labor force and job access issues and regional public investment and development policies.

29. How are the work items in the UPWP developed and prioritized?

East-West Gateway work elements in the UPWP are developed through a coordinated effort among department directors based on a general estimate of the agency’s budget for the upcoming year. The development process begins with a review of the agency’s current work program and the identification of those elements that must (or should) be carried on into the next fiscal year. Staff then evaluates and modifies the work items necessary to support on-going agency programs and to meet federal requirements. Once those necessary elements are created, staff evaluates major issues, emerging trends, and federal emphasis areas and identifies subject areas that fit with the agency’s policy agenda, sphere of influence, and staff resources. Work elements are then created for those subject areas. Priority setting generally involves a mix of four questions: Is funding available for the work element? How vital is the proposed work to the community, economic, and environmental health of the region? Is the Council the most appropriate agency to carry out the work? Can the Council sustain the activity?

Work elements in the UPWP proposed by cooperating agencies are typically incorporated into the program as submitted.

30. How are the needs of each unit of government in the region determined and addressed in the UPWP?

We do not determine the need of units of governments. Rather, we base our assessment of needs on evaluation of the transportation system and its performance in serving the needs of citizens. Needs are a reflection of unsatisfactory system performance, rather than expressions of requirements by local governments. The UPWP is designed to produce the analyses necessary to quantify transportation needs, leading to planning and programming of suitable transportation improvements or policy changes.
31. Does the UPWP reflect all transportation planning activities in the MPA, regardless of how they are funded?

The UPWP contains all significant planning activities of the major cooperating agencies, regardless of funding source, and it incorporates all planning activities, irrespective of jurisdiction, that staff becomes aware of during the document’s development.

32. How is the EWGCOG addressing the required seven factors in their planning process?

All seven factors fit within the six focus or priority areas established by East-West Gateway in the long-range transportation plan to guide regional decision-making. The focus areas are: preservation of existing infrastructure, safety and security in travel, congestion, access to opportunity, sustainable development, and efficient movement of goods. As part of the current long-range plan development effort, staff is working to refine performance measures and evaluation methods that can be used to analyze the state of the system, to evaluate individual projects in regional and subregional planning studies, and to establish project priorities relative to the six factors.

33. How does the EWGCOG respond to the annual Planning Emphasis Areas (PEAs) provided by FHWA/FTA? Do PEAs typically meet the MPOs planning emphasis needs?

East-West Gateway does review and incorporate, in ways appropriate to local needs, the PEAs into UPWP elements and study processes. Because the PEAs typically are preceded by other federal guidance, they usually are consistent with the direction staff is already moving.

How did the EWGCOG respond to the Year 2003 PEAs of Environmental Justice, ITS and U.S. Census?

Because East-West Gateway has a history of involvement with the Census program and because the agency has been involved with ITS since the mid-1990s, little agency response was required to those emphasis areas. The agency did, nevertheless, include a new work element – Integrated Transportation Systems Management and Operations – to reflect a greater emphasis on ITS and the importance of system operations. The agency’s response to the emphasis on Environmental Justice is characterized in later responses.

Transportation Improvement Plan (TIP):

34. How is the TIP developed? What is the project selection process?

East-West Gateway develops a five-year TIP that is updated annually. The selection of projects for inclusion in the TIP is consistent with principles and priorities outlined in the metropolitan transportation plan. The TIP development process and the project selection process are described in greater detail in Attachment 2, which is excerpted from the FY 2004-2008 TIP.
35. Does the TIP include information on a) project prioritization criteria, b) project implementation status/problems?

The TIP includes information on criteria used to set project priorities, but not on the status of or problems associated with projects. That information is part of the reasonable progress reporting process (see discussion in Attachment 2).

36. Does the TIP contain all of the Federal funded projects that will be implemented during the year?

All projects using federal funds are included in the TIP.

37. How is the TIP fiscally constrained?

Unless there is a realistic expectation of additional funds becoming available, the TIP typically contains only those projects that can be funded within the revenue estimates prepared as part of the TIP development process. Local project sponsors are required to certify that local funds are available to meet the federal match requirements.

Is the TIP constrained by year and each class of funds?

Yes.

38. How and when does the transit operator provide information about available and anticipated financial resources to the EWGCOG, State, and local governments? Is this information accurate and is it provided in a timely manner?

Information on anticipated financial resources is generally provided at the time the TIP is being developed, although none of the major cooperating agencies submit formal correspondence identifying available resources.

IDOT informally provides anticipated financial resources for Suballocated STP, CMAQ and Enhancement funds at the time the TIP is being developed. Information on resources available for the state program is provided when the program is submitted.

MoDOT does not formally provide information on anticipated financial resources for Suballocated STP, CMAQ and Enhancement funds. East-West Gateway staff develops those estimates, which are confirmed later by MoDOT once federal budgets are approved. Information on resources available for the state program is provided when the program is submitted. Those resource estimates, however, tend to change frequently during the development of the TIP and even after its adoption.

Metro informally provides information on anticipated financial resources when the program is submitted. Generally, there are significantly more discretionary funds identified than can be reasonably expected, and East-West Gateway staff, working with Metro staff, develop a more reasonable estimate during the TIP’s development. For the FY 2005-2009 TIP, only projects with approved discretionary funding were included in the document.
Local sponsors certify the availability of matching funds by submitting, with project applications, a non-federal funding disclosure form. That form, which must be signed by the jurisdiction’s chief elected official and financial officer, indicates the availability of funds and the sponsor’s commitment to use those funds as local match.

39. How is the project cost estimated? Does each project show the proposed revenue source (amount of Federal funds to be obligated during each program year and sources of non-Federal funds)?

Project sponsors are responsible for all cost estimates. MoDOT and IDOT go through a detailed project scoping process to estimate costs prior to a project being introduced to the TIP. For projects in the out-years of the TIP, costs are refined as projects move closer toward implementation. Local sponsors are asked to estimate project costs and provide a detailed cost estimate at the time of application for federal funds. Project sponsors typically prepare reliable estimates because they are aware that federal funds are limited and that there is little opportunity to increase the federal funds programmed for a project once it is included in the TIP.

As part of the TIP development and amendment processes, each sponsoring agency is required to provide detailed funding information, including: the amount of Federal and matching funds to be obligated each program year and the source of those funds.

40. How does the TIP demonstrate which projects are to be implemented using current revenues and which projects are to be implemented using proposed revenue sources?

Because the TIP is financially constrained, East-West Gateway typically does not include projects that are to be funded with proposed revenue sources. The principal exception to this has been the inclusion of projects using uncommitted discretionary federal transit funds. This year, for the first time, the agency has not included that funding in the TIP. The TIP does, nevertheless, list the projects for which sponsors would use discretionary funding if it becomes available.

41. In the case of new or proposed funding sources in the TIP, how are strategies for ensuring their availability identified.

We request written verification of the funding availability from the appropriate agency/sponsor.

42. Does the TIP include unobligated balances from prior years in the Federal Funds revenue forecast? Explain

Unobligated balances are built-in, but not separately identified, as part of the revenue forecast of reasonably expected Federal funds.

43. Does the TIP include a listing of projects for which Federal funds were obligated in the preceding year? If not, how is this in formation provided to the public?

The TIP does include a listing of projects for which federal funds were obligated in the preceding year. Additionally, that information is provided through the project monitoring process.
44. What are the procedures for TIP amendments?

The TIP, although illustrating a prioritized schedule of projects, is a working document requiring periodic amendments during the year to reflect funding availability and to aid in implementing projects in an efficient and timely manner. The TIP can be amended at any time during the year. Aside from posting proposed amendments on the agency’s website as part of the Board agenda, public outreach only occurs for major amendments. The amendment process, as described in the TIP, is contained in Attachment 2.

How do amendments impact project delivery and fiscal constraint?

Amendments typically assist project delivery. We generally only amend the TIP mid-year for projects that are being implemented in year one of the program. Projects that are set for implementation in later years of the TIP are brought into the document during the annual update process. With regard to fiscal constraint, only projects with funds identified are included in the document.

How is fiscal constraint maintained when projects are moved among the years of the TIP?

If project modifications are made by moving projects from one year of the TIP to another year, we require that a project or projects of similar cost and category be moved to accommodate the modification and offset any change (on an annual basis) in programmed funds v. available funds. The exception to this are projects advanced because of additional revenues in year one of the TIP, which necessitates advancing projects to use those funds.

45. Is Advance Construction used and how does it affect the TIP?

Yes. Advanced construction has principally been used by MoDOT. The effect of advanced construction on the TIP is negligible. The federal funds being used for payback of the projects using advanced construction are programmed in the TIP and remain programmed until available for obligation.

46. What is the process for ensuring that projects in the TIP are consistent with the MPO's LRTP and the Statewide LRTP?

East-West Gateway’s project evaluation and selection processes are based on the principles and priorities outlined in the metropolitan transportation plan. Additionally, the two state transportation agencies consider East-West Gateway’s priorities when submitting projects for the TIP; the project evaluation and rating process used by MoDOT district is consistent with the region’s planning framework; and the major policy principles of MoDOT’s LRTP are very similar to those of the region’s plan.

Long Range Transportation Plan (LRTP):

47. When was the LRTP adopted, what is the horizon year, and how is the plan updated?
The current LRTP, with a horizon year of 2025, was adopted by the Board of Directors in March 2002. Staff is preparing an update of that plan, with a horizon year of 2030, for Board approval in March 2005. As required by law, East-West Gateway is committed to a three-year update cycle for the LRTP.

48. In regard to the LRTP, how and when is information about available and anticipated financial resources provided to the EWGCOG? Is the information accurate and is it provided in a timely manner?

East-West Gateway has already received information on financial resources from cooperating agencies for the LRTP update. Typically the information has been provided upon request. Staff sometimes has to modify that information to compensate for over-optimistic revenue forecasts or to test financial scenarios, but the information provided is accurate. While staff has not set up a formal process with the state DOTs or Metro for cooperatively developing information on financial resources, the current process presents no major difficulties.

49. Does the scope of the LRTP include the 11 items of 23 CFR 450.322(b)?

The LRTP incorporates all 11 items.

50. The LRTP addresses performance measures. Have performance measures been developed and if so are they being met?

While performance measures have been developed, performance standards have not. We can, therefore, evaluate changes in the system using the measures, but we are not to the point of using performance measurement to direct investment.

51. The LRTP mentions that the City of St. Louis is responsible for most of the roads within their jurisdiction and that the EWGCOG would like to see MoDOT assume more of that responsibility. Has any changes occurred yet?

Yes. The Missouri General Assembly directed MoDOT to assume responsibility for nearly forty miles of major arterials in the City of St. Louis.

52. Does the EWGCOG intend to include illustrative projects in the next updated LRTP?

While East-West Gateway will produce a financially constrained plan, staff will include illustrative projects tied to different funding scenarios. Given the constrained revenues and financial uncertainties facing both Metro and MoDOT, and the limited number of projects that can be financed with existing revenue streams, the inclusion of illustrative projects is needed to create a broader investment strategy by identifying those projects that would be implemented if additional resources become available.

53. How is the transit authority’s planning process coordinated with the EWGCOG planning process?
Planning for major transit capital investments is conducted under the sponsorship of East-West Gateway, in cooperation with Metro, through the TCIG. Other transit planning is conducted by Metro according to the planning principles, derived from the LRTP, agreed to in the MOU between Metro and East-West Gateway.

54. Describe the relationship between the EWGCOG’s LRTP and the States’ LRTP.

MoDOT’s and East-West Gateway’s LRTPs are consistent in principle. The state plan recognizes the metropolitan planning process and the joint planning and decision-making that takes place between the Department and Metropolitan Planning Organizations.

Are there any MODOT corridor studies in the MPA? Is the EWGCOG involved in those studies?

MoDOT currently has no major corridor studies underway.

SAFETY:

55. How are safety considerations addressed in the planning process and products?

Safety is the second highest priority area in all transportation planning conducted by East-West Gateway and its planning partners. That priority is reflected in the evaluation measures used to select projects for the TIP and LRTP and in the rigorous evaluation of safety issues in corridor and subarea studies.

56. Discuss any safety programs East-West Gateway manages or participates in.

Motor vehicle crash fatalities have been one of the issues that East-West Gateway staff has researched as part of the Where We Stand strategic assessments we have been producing since 1992. In 2004, staff updated this indicator, using 2002 data from the DOT’s FARS database. These data placed the St. Louis MSA 9th highest among 35 peer metropolitan areas in motor vehicle crash fatalities per 100,000 population. This rate was comparable to that of Kansas City, but much higher than many other midwestern regions with similar road networks and land use patterns.

Staff prepared a series of regional maps showing the location of fatal crashes and conducted further analysis, using crash records provided by the two state highway agencies for the time period 1997 - 2002. This analysis concluded that driver inattention was involved in a full one-third of all fatal crashes during the time period. Drinking was a factor in 30 percent of crashes. Other factors involved in more than ten percent of all crashes, each, were speeding, driving too fast for conditions, and failure to yield.

These driver behavior factors are the focus of a regional transportation safety program under development in 2004 by East-West Gateway. Activities are organized around the three “E”s” that complement our more traditional engineering approach: enforcement, emergency response, and education. The enforcement component of the program is being planned and will be implemented in cooperation with the Local Government Leadership Partnership that East-West Gateway and the University of Missouri- St. Louis manage, tapping into networks of public safety officials throughout the region that the state transportation agencies have already organized. We are
developing the emergency response component of the program in cooperation with our affiliate homeland security initiative, St. Louis Area Regional Response System (STARRS). Quick and efficient access to appropriate trauma care is a goal of both.

To guide the development of our educational program, East-West Gateway has convened a citizens advisory committee with 15 members, all of whom are either crash survivors, family members of crash victims, or counselors of crash victims and their families. A professional facilitation and communications firm is working with this group to develop messages, identify media, and devise other educational tools. Public events are being planned for three occasions – early September (around the Labor Day travel week-end), early October (around National Drive Safely Work Week), and mid-November (East-West Gateway’s annual meeting and awards ceremony). The November event will include a regional transportation safety conference that will bring together a broad base of stakeholders in the three “E’s,” including citizens. During the month of December 2004, we intend to assess and critique what the agency and our partners have been able to accomplish to date, and plan for activities in 2005.

57. How does the EWGCOG consider safety in the project priority selection criteria or process? How is the MPO promoting safety with its transportation partners?

The evaluation processes for project selection in both the TIP and LRTP are point-based. Both processes have safety measures that are evaluated and given priority consideration in awarding points to competing projects.

58. Are there any planning initiatives to review the security of airports and movement of freight on the highway and rail networks in your area?

There are a number of uncoordinated planning initiatives in the region concerned with the security of infrastructure. A principal goal of the St. Louis Area Regional Response System (STARRS), which has been organized under East-West Gateway as part of the national Urban Area Security Initiative, is to identify, assess vulnerability of, and develop (coordinated) plans to protect critical infrastructure.

MODELING CAPABILITY/INTELLIGENT TRANSPORTATION SYSTEMS (ITS):

Modeling Capability

Who at EWGCOG is responsible for travel forecasting? What are their duties?

The five-member Systems Evaluation section of the Transportation Planning Department is responsible for maintaining and updating travel data sets, networks, and model components.

59. Please provide a brief description of the technical aspects of the modeling processes including the last model revision, description of models used, what data was used to calibrate the model set, what year and data source(s) the model was validated against, the size of network, number of zones, how non-home based travel is modeled (e.g., freight, commercial services, through traffic, tourists).
East-West Gateway currently uses the CUBE model platform for both highway and transit modeling. The socioeconomic data is stratified into 1066 traffic analysis zones. The highway network contains over 13,000 links, of which nearly 5,000 connect zone centroids with the modeled network. The modeled network represents approximately 24% of the 14,000 miles of roadway in the metropolitan area. The 1998 base year model was calibrated utilizing the 1990 household travel survey and results were validated against 35 cutlines and MoDOT and IDOT AADVMT data.

The model is a standard 4-step modeling procedure that includes: trip generation, trip distribution, mode split, and highway assignment. The trip generation model uses a cross-classification form to estimate total trip productions, based on households, stratified by income and household size. Linear regression equations are used to calculate trip attractions. The trip distribution uses a gravity model formulation, including K-factors, to estimate person-trip matrices from the production and attractions of the trip generation model. The distributions are calculated by purpose with a seven-iteration feedback loop mechanism utilizing loaded travel times from subsequent feedback loop iteration. The mode choice model is a multinomial logit model that is stratified by eight geographic markets. Three income categories are used for additional dimension to the stratification. The mode choices include drive alone, 2, and 3+ person auto, and walk-access transit and drive-access transit. Variables used in the auto utility equations include in-vehicle time, access/egress time, and operating costs for auto modes, as well as HOV time savings for 2 and 3+ autos. Variables used in the transit utility equations include in-vehicle time, walk and drive access time, number of transfers, and transit fare. The highway assignment model uses an equilibrium routine and comprises the entire day’s demand and is distributed into three parts, AM, PM, and off-peak periods. Diurnal factoring is deterministic using a set of fixed factors to determine period vehicle-trips. Hourly trip factors are used to convert daily trips in production/attraction format to hourly trips in origin/destination format. These factors are stratified by hour, direction, and by trip purpose. The transit assignment model separates work and non-work trips and by walk or drive access mode. The peak transit network is used for work trips while the off-peak transit network is used for non-work trips.

Non-home based travel is modeled utilizing the 1990 household travel survey, and truck and external station counts conducted by MoDOT and IDOT. The non-home based and commercial trips are included in the trip distribution feedback procedure, with external K-factors applied in the final iteration, and each assignment.

60. Has the EWGCوغ convened a peer review or other independent assessment of their travel forecasting methods?

No, although we have and are submitting applications for the TMIP travel demand peer review grant.

61. Does the EWGCوغ have a strategic plan and a guaranteed minimum level of funding in its UPWP for maintenance and improvements to its travel forecasting methods? What efforts are underway to update the models?

Yes. East-West Gateway is currently undertaking a major update of its travel demand model. Several data collection efforts have been completed to update model components and estimation,
calibration, and validation data sets. A roadway inventory was conducted to expand the highway network and update its attributes. A major household travel survey and on-board passenger survey was conducted to update trip generation, trip distribution, and mode split equations. A speed and delay study was conducted to update estimation and validation data sets. An area type sub-model was created to classify speed and capacity characteristics and stratify work-trip attractions within the trip generation model and summarize results within the model choice model. To assist and direct East-West Gateway staff in the estimation, calibration, and final validation of a new multimodal, trip-based travel demand model, East-West Gateway has contracted with a consulting team led by PB Consult.

**Does the EWGCOG organizational structure include a technical committee to review planning assumptions and forecasting methods?**

Planning assumptions and forecasting methods are reviewed by and discussed with both the Transportation Planning Committee and the Inter-Agency Consultation Group.

**62. Are there any major transportation investment alternatives such as new highways or transit lines, corridor or sub-area planning studies recently completed or underway?**

Two studies are underway and two studies are about to begin. The two underway are: Gateway Connector (IL 158) Corridor Preservation Study and the Metro South Alternatives Analysis/Draft Environmental Impact Statement. The two about to begin are: Gateway Connector Phase I Study and the Madison County MetroLink Feasibility Study.

**63. What has been the EWGCOG’s involvement in the 2000 Census?**

The 2000 Census is very important to the agency’s analysis, planning and decision-making functions. East-West Gateway involvement occurred through a number of activities. Highlights are:

*Definition of Transportation Analysis Zones (TAZs)* Staff delineated geographic units of the region as TAZs for the agency’s long-range transportation planning/network demand modeling. This was done via the Bureau’s “TAZUP” program and involved the specification of Census Blocks to comprise delineated geographic units specified by transportation modeling/planning staff. The definition process involved collaboration with Census Bureau staff to ensure zone conformance to Bureau acceptable boundary criteria.

*Enhancement of the Census Bureau’s Employer Database* Staff assistance was provided to improve the Bureau’s database for workplace employment tabulation and geocoding. This was done through the Bureau’s “WORKUP” program and involved editing of an employer file for attribute refinement and geocoding corrections. The resulting product, CTPP - Part 2 (workplace employment file), is very popular with local planners as this is the only source of small area place of work employment data.

*Local Assistance* Staff assisted local governments in the acquisition and application of early census releases to various needs, including redistricting efforts. Assistance was also provided with housing count review for the Bureau’s Count Question Resolution (CQR) program. More recent
assistance includes providing information on methods to obtain post-2000 counts [e.g., via special census and the Bureau’s Geographically Updated Population Certification Program (GUPCP)].

Data Dissemination  Staff prepared and disseminated monographs, via the agency’s web page, from 2000 census data. Also, staff maintains a web-based data center through which census and other data are continually provided.

Census Transportation Planning Package (CTPP) Delivery  Staff reviewed preliminary releases of Census Transportation Planning Package (CTPP) data for general conformity with other census products. For internal application, staff produced a translated version of CTPP - Part 2 (workplace file) employment data from “worker-based” to “jobs-based.”

64. What is the status of GIS activities?

East-West Gateway has a GIS section within the Planning and Information Systems department. That section, which currently has a staff of three, focuses on maintaining, developing, and expanding the GIS capabilities of the agency. In addition to that section, each department has staff with GIS skills. Current efforts are focused on:

- maintaining a comprehensive data directories with applicable layers of spatial data
- creating or acquiring additional spatial data to support specific agency initiatives or requests
- creating useful project-specific GIS applications and informative mapping products
- providing technical support for all agency staff utilizing GIS for analysis, visualization and modeling
- assessing agency GIS needs and matching recently released software upgrades and applications to those needs

GIS staff recently completed work for the All-hazard Mitigation Plan. Staff continues to support the Blueprint/LEAM modeling initiative with pertinent vector and raster datasets, including acquiring assessor parcel data and the latest landcover data available for the Missouri portion of our region. Staff continues to support transportation planning, policy and programming, transportation technical services and Metro South initiatives with technical assistance for GIS users, custom map displays, presentations, templates and data collection and conversion. Staff has begun data collection, analysis and mapping for the Water Quality Coordination - Lower Meramec River project, as well as continuing to support the Regional Water Resources Council. GIS staff has maintained and improved our presence and participation in the local and state GIS users community and continues to foster relationships and data sharing with regional GIS users.

Implementing Geographic System (GIS) technology in the regional environment is enhancing regional collaboration and productivity through shared use of data and information. The dissemination of information on regional development patterns, transportation analysis zones (TAZ) the Regional Blueprint Model, socioeconomic trends, environmental changes and the burgeoning applications of Homeland Security are keys to enhanced decision-making activities.

Currently, the staff is adding important capabilities by training in ArcGIS 9, which will add a more comprehensive geoprocessing framework and toolkit for creating and executing complex GIS
procedures. ArcGIS 9 tools range from common GIS operations, such as overlay, buffer, and data management, to more advanced operations for faster processing, topology, and schema functions.

**Intelligent Transportation Systems (ITS)**

65. **What is the status of ITS in the MPA?**

ITS Regional Architecture is under development with full participation from IDOT, MoDOT, East-West Gateway and other regional stakeholders. Regional architecture will identify existing and planned ITS systems. As stated in 2004 UPWP for Integrated Transportation Systems Management and Operations, Turbo Architecture was purchased by EWGCOG and existing database information from Tiers I and II workshops is being prepared. A number of ITS projects have already been implemented in the region, or are planned. Most of these are related to freeway management, although some are related to transit or arterial management.

66. **Has the EWGCOG developed a locally defined ITS integration strategy to guide future investment decisions and foster integration and interoperability?**

Based on our plans outlined in FY 2004 UPWP, an ITS integration strategy to guide future investment decisions will be developed from the Regional Architecture which is currently under development. This strategy will be coordinated between agencies, local officials, and regional stakeholders. Regional meetings will be convened to ensure full participation in ITS regional planning by all partner agencies.

**Is the integration strategy part of the EWGCOG’s transportation planning process?**

As outlined in the FY 2004 UPWP, the framework for integrating the Regional Architecture and other M & O strategies will be integrated into EWGCOG’s transportation planning process.

67. **Which agencies are participating in the development of the ITS integration strategy and has it been documented as part of the LRTP?**

MoDOT, IDOT, Metro and local officials are participating in the development of the Regional ITS Architecture and will be involved in the development of the ITS integration strategy. Currently, funding for planning ITS integration is part of the LRTP and the integration strategy will be incorporated into the plan.

68. **Is the integration strategy leading to the development of a regional architecture?**

The regional architecture will create the foundation for the development of the integrated strategy. The Regional Architecture and the integration strategy will continuously be updated to maintain currency and effectiveness.
LAND USE/GROWTH ISSUES:

69. How does the EWCGOG link transportation and land use?

East West Gateway has an initiative—the Blueprint for Sustainable Futures for the Gateway Region—focused directly on land use and transportation linkages. The Initiative for Metropolitan Communities in the mid-1990s identified land use and sustainable development as a high priority area for the agency. Beginning in 2001, East-West Gateway secured a TSCP grant for work focused on regional sustainability. This project the has involved in-depth research and analysis of methods to increase our ability to project long term impacts on land use from transportation projects and to project long term transportation needs based on changing land use patterns.

Beginning in 2003, East West Gateway developed a partnership with the State of Illinois and University of Illinois Urbana-Champaign to develop a land use model for the St. Louis region based on LEAM (Land Use Evolution and Assessment Model). This model, which East-West Gateway calls the Blueprint Model for its St. Louis application, is being developed to address a range of issues including impacts of transportation projects on regional growth, fiscal and employment impacts of such projects, and alternative growth scenarios. The first stage of the Blueprint Model is being completed in 2004. Public meetings in Metro East, St. Charles County and the City of St Louis have brought stakeholders together to address model development, drivers of growth, and high priority scenarios. The modeling process is creating a high level of interest among local planners, economic development agencies and citizen organizations. An advisory group that includes planners from the eight counties, university researchers, citizens, business representatives and other stakeholders will continue to provide input to the modeling process.

When complete, the model will be a tool to assist in long range planning; in its development phase it is a useful tool for citizen engagement.

70. Is there a regional land use plan?

71. How is it maintained and updated? Is it consistent with local zoning?

There is no regional land use plan. However, East-West Gateway does maintain data that represent, as practically as possible, the region’s existing development patterns and indicated future directions (by local plans) in a data base that is used for land use allocation modeling and which provides input into the transportation planning process. Projections and subcounty allocations are developed in consultation with local planning officials. Information for updating the database is monitored continuously, with the actual updating relating to the cycles of long-range transportation plan update. The land use database strives for practical consistency with local land use plans and their zoning implementation.

Is urban sprawl an issue in the metropolitan area? Are their initiatives or policies already in place to control growth or encourage a more compact urban form, including transit-oriented development?

As is the case for many metro areas in the nation’s Midwest, development patterns in the St. Louis region over the past 50 years have been characterized by a remarkable spreading and thinning out
of core population and employment centers -- with relatively high rates of growth in suburban and ex-urban areas; slow growth, stagnation, and decline in inner ring suburbs; and steady loss of people and jobs in the central city. According to a study published in July 2001 by the Brookings Institution, the population of the St. Louis region increased by 6 percent between 1982 and 1997, while the amount of urbanized land in the region increased by 25.1 percent. The result was a 15.3 percent decrease in the overall density of development -- one of the indicators of what is popularly referred to as "sprawl."

Planning and zoning is locally controlled throughout the St. Louis region, a practice that is fervently defended, frustrating the region’s ability to manage growth and development in any coordinated, goal-driven manner. There is some discussion underway currently at the state level in both Missouri and Illinois about coordinated and cooperative growth management planning, but there is not now, and probably will not be in the foreseeable future, any effective state or region-wide growth management plan for the bi-state St. Louis region.

Local decisions about development, which are often supported with state resources, impact both the demand for transportation infrastructure and services and the relevance of various transportation investments as problem-solving tools. East-West Gateway, therefore, has chosen to be active in the regional discourse about growth through the policies of the long-range transportation plan, development of the Blueprint Model, several efforts examining the effects of tax subsidies and local government taxes and expenditures, and associated activities of the UPWP.

72. Have any access management or corridor preservation initiatives been identified or begun? How is the EWGCOG involved? How is the transit operator involved?

There have been no sustained and comprehensive access management initiatives and only a few corridor preservation initiatives in the metropolitan area. MoDOT has adopted a set of access management guidelines and is attempting, on a project-by-project basis, to implement those guidelines. As to corridor preservation, Citizens for Modern Transit, a local transit advocacy group, did acquire and preserve, with the support of East-West Gateway, the right-of-way from Clayton to Shrewsbury that the Cross-County MetroLink extension to Shrewsbury will use, and Madison County Transit has obtained a number of rail corridors that could be used for bicycle facilities or a future MetroLink expansion. In addition, IDOT will soon to complete a corridor preservation study for the Gateway Connector (IL 158 – Columbia to Troy).

73. Have any “Brownfields” been identified in MPA? If so, what efforts are underway to effect reuse of those areas?

In response to a U.S. EPA grant received by East-West Gateway in August 2002, four organizations began working together as Core Project Partners on a two year Brownfields/Open Space Initiative. The partners are East-West Gateway, St. Louis Land Clearance for Redevelopment Authority (LCRA), University of Missouri-St. Louis Local Government Leadership and Management Program, and the East St. Louis Community Development Block Grant Corporation. Brownfields were identified in ten inner ring suburbs along with the City of St. Louis and the City of East St. Louis. In addition, local government officials from several other urban core municipalities participated in project meetings and workshops.
While working on Brownfield issues, St. Louis and East St. Louis gained a context for understanding how important this issue is for inner ring communities that are also working on community, recreational, and economic development. Communities in the region can learn from each other’s experiences in overcoming barriers and find common strategies that assist all St. Louis urban core communities in their efforts to promote redevelopment.

Addressing some of the more crucial barriers that exist to urban core redevelopment will ultimately facilitate redevelopment and make the urban core more attractive. This in turn offers alternatives to developing regional periphery open space referred to as ‘greenfields’. Documents produced during the project are made available to the public via the East-West Gateway website. The data center has links to environmental data repositories, including database developed by the St. Louis Development Corporation and East-West Gateway. Also included are proceedings from activities undertaken as part of this U.S. EPA grant, such as legislative updates. The policy paper, “Brownfields in the St. Louis Region: Opportunities to Improve Quality of Life and Strengthen Communities,” is now posted on-line.

In September 2004, East West Gateway staff is organizing and moderating a panel of experts on Regional Modeling and the Role of Brownfield Redevelopment in Urban Land Use Transformation at the National Brownfields Conference being held in St. Louis.

CONGESTION MANAGEMENT SYSTEM (CMS):

74. Describe how the CMS been fully integrated into the overall metropolitan planning process.

Several of the activities identified as components of the CMS are currently being accomplished as part of the continuous, comprehensive and cooperative transportation planning process. It is intended that the CMS enhance these activities by instituting a systematic approach to the development and analysis of information useful for both the LRP and TIP. CMS strategies are examined in all corridor studies and are a requirement for capacity-adding projects advanced to the TIP. See Attachment 3.

What are the outputs/outcomes of the CMS?

Congestion Management Reports that examine individual strategies and alternatives for alleviating congestion and enhancing mobility.

75. Does the CMS address highways, transit infrastructure, and the mobility needs of people and goods?

Yes. Development of the CMS was guided by the following goal: “To improve the accessibility and the mobility of persons and goods within the regional transportation system by assessing the existing and future impact of traffic congestion and implementing successful measures and techniques necessary for effective mitigation.”
76. What kind of interaction with local transit, freight and traffic control operators, etc. has been established?

Interaction is generally project or strategy specific.

77. What procedures connect the CMS evaluations and products to the metropolitan planning process (UPWP, transportation planning, corridor studies, conformity, and TIP development)?

Any major capacity-adding project that is proposed for federal funding in the TIP must demonstrate that alternative strategies for alleviating congestion and enhancing mobility have been considered in accordance with the Congestion Management Handbook published by East-West Gateway in 1997.

How does the CMS affect the programming of projects?

If a CMS report, for projects requiring one, is not completed at the time of application for inclusion in the TIP, the project is not considered.

78. How often is the CMS updated and what is the product of the update?

The CMS has not been updated since it was adopted although many of the data components maintained by the state DOTs, Transit Operators and East-West Gateway are updated annually.

79. What are the performance measures and how are they being used?

A set of performance measures has been identified for use in assessing the condition of the monitoring system network. Measures were selected based upon: the availability of data from existing sources, the applicability of those measures in quantifying system performance, the ability of the performance measure to help forecast future system deficiencies, and the feasibility of measuring system performance for the regional long-range transportation plan (LRTP). The performance measures selected for the St. Louis Region CMS are as follows:

- Volume-to-Capacity (V/C) Ratio;
- Vehicle Density;
- Vehicle Speed;
- Vehicle Miles of Travel (VMT);
- Transit System Peak Load Factor;
- Park-and-Ride Lot Utilization; and
- Person Throughput.

80. Are the performance measurements based on actual data or are they modeled?

The CMS integrates a number of data collection and monitoring activities, currently in place, into a system for monitoring the performance of the transportation system. These activities include:

a. EWGCC/MoDOT/IDOT aerial survey;

b. MoDOT travel time runs;
c. MoDOT Intelligent Transportation System (ITS) activities; 
d. state and local traffic count programs; 
e. state and local loop detector systems; 
f. transit agency monitoring programs; 
g. EWGCC travel demand model; 
h. MoDOT Enterprise database system; and 
i. IDOT Illinois Roadway Information System (IRIS).

In addition to the monitoring activities currently in use in the region, the CMS attempts to integrate additional data sources into the process including the EWGCOG vehicle occupancy count program and an expansion of ITS activities.

What CMS strategies are being implemented and how are they integrated with those resulting from other elements of the metropolitan planning process?

A key intent of the CMS is the consideration of alternative strategies for relieving congestion and improving mobility. Strategies currently being implemented include but are not limited to: transportation demand management (TDM) measures, traffic operational improvements, public transit capital improvements, public transit operational improvements, bicycle and pedestrian improvements, access management strategies, incident management, and Intelligent Transportation Systems (ITS).

81. What is the status of implementation of the management systems in the metropolitan area? Is the output from any of the management systems used in the decision-making process?

Only the congestion management system has been implemented in the St. Louis area, and that system is only being used as a requirement in project development. Although the other management systems have not been implemented, most of the data collection and analysis envisioned by those management systems is being conducted by the DOTs and Metro.

82. How is the progress toward system performance goals evaluated? How is the effectiveness of individual projects/strategies evaluated? How is the success of individual actions reflected in system wide/network-wide evaluations?

There are a number of regular data collection programs that provide input into an assessment of performance trends and strategy impacts. These include state and local traffic count programs, the regional aerial survey, accident reporting, and transit data collection. Accident reporting and transit data are used extensively to monitor the effectiveness of implemented strategies. Both IDOT and MoDOT review accident records, particularly those for high accident locations, to assess whether implemented projects have improved safety. Through its regular monitoring, Metro evaluates the impact of system changes and major improvements such as MetroLink.
Additionally, East-West Gateway develops a state of the system report as part of developing the LRTP. The report examines the transportation system as it relates to the region’s six priority areas – preservation, safety, congestion, access to opportunity, sustainable development, and goods movement. The report examines the system condition and the progress toward achieving the goals for the system.

TITLE VI/ENVIRONMENTAL JUSTICE:

83. What strategy and efforts has the planning process developed for ensuring, demonstrating, and substantiating compliance with Title VI?

With the adoption of preservation of the existing transportation system as the #1 priority of the regional transportation plan in 1994, the East-West Gateway Board made a commitment to improving the mobility and economic vitality in the older urban areas of the region, where approximately 80 percent of the region’s population of color resides. This was a significant departure from past practices, and is probably the most meaningful policy shift that has been made.

East-West Gateway has also been one of the agencies in the region that have been actively and persistently involved in developing and supporting better access to jobs in the construction industry (highways, rail, commercial, and residential) for African-Americans and women. With the support of the Annie E. Casey Foundation, the state of Missouri, and the Carpenters’ Union, East-West Gateway launched a “Pathways to Construction Careers” pre-apprenticeship training program for young African-Americans in 1996. Pre-apprenticeship training for construction jobs is now done by the Construction Prep Center located at the MET Center, which East-West Gateway (along with MoKan Minority Construction Network and MoDOT) helped form and in which we stay actively engaged. In the past two years, 142 young African-Americans have graduates from the Construction Prep Center, ready for apprenticeships on transportation construction and rehabilitation jobs. Eighty-one of those did find construction jobs, at an average starting wage of $13.78 per hour. While much work remains to be done to ensure that more apprenticeships are available in the future, MoDOT and East-West Gateway are committed to continuing to work toward this goal.

East-West Gateway staff provided assistance the United Congregations of Metro East advocacy group in developing a strategy to replicate the Construction Prep Center in Illinois.

More broadly, the issue of racial disparity in the St. Louis region has been a focal point of the agency for several years. Date from the Where We Stand strategic analysis indicate that disparity between African-Americans and whites on a number of different indicators is remarkably high in the St. Louis region. These indicators include educational attainment, housing, health care, and more. Transportation access is related to improving all these indicators, of course. Staff has made numerous public presentations on this topic in the two years since Where We Stand was last updated. The groups we have addressed on this issue include the Fannie Mae Partnership, the St.
Louis Business Diversity Initiative, Gateway Connections, Civic Progress, Focus St. Louis, the Scholarship Foundation, the St. Louis Association of Community Organizations, Neighborhood Housing Services, and more.

84. What measures have been used to verify that the multimodal transportation access and mobility performance improvements included in the long-range plan the TIP comply with Title VI?

The following mobility and accessibility measures are evaluated directly in the LRTP:

- Transit accessibility to jobs – peak hour access within 60 minutes
- Transit accessibility to jobs – off peak access within 60 minutes
- Auto accessibility to jobs – peak hour access within 45 minutes
- Auto accessibility to jobs – off peak access within 45 minutes
- Total travel time – origin and destination ends
- Delay as a percent of total travel time – origin and destination ends
- Average travel delay per trip – origin and destination ends

In addition, the plan examines the geographic distribution of investments, and examines issues such as pavement and bridge conditions and safety characteristics with reference to EJ communities.

85. Have there been any Title VI complaints regarding the EWGCOG or the transportation planning process?

There have been no Title VI complaints concerning East-West Gateway or the transportation planning process brought to our attention.

86. Describe the EWGCOG’s policy on how Title VI complaints will be handled?

Any Title VI complaints are to be directed to the Director of Administration. The Director of Administration will notify the appropriate outside Agencies, the Council’s Executive Director and the appropriate Department Director of the complaint. The Council’s staff will review the complaint and the facts and circumstances regarding the activities surrounding the complaint. A written response to the individual will be prepared by the Council. The response will be provided to the appropriate Agency, as well. The Council will make every effort to implement corrective action if it is required.

87. Has the planning process developed a demographic profile of the metropolitan planning area that includes identification of the locations of socioeconomic groups, including low-incomes and minority populations as covered by the Executive Order on Environmental Justice and Title VI provisions?
Yes. EJ sensitive communities have been identified using Census 2000 demographic and socio-economic data. A comprehensive analysis was completed using block group level data. Communities were identified as EJ sensitive if they met three criteria:
(1) if a block group had a minority population that exceeded the regional average of 24%.
(2) if a block group had a number of low income households that exceeded the regional average of 5%.
(3) if a block group had either zero vehicle households (5%) or disabled populations (14%) that exceeded the regional average.

In addition, a variety of demographic profiles are available on our web site. Staff has used Geographic Information System software to display the racial and socioeconomic attributes of our population geographically as part of two reports: The State of the System and The Geography of Opportunity.

88. How does the planning process seek to identify the needs of low income and minority populations? What planning processes are in place to assess the distribution of impacts on these groups due to the transportation investments identified in the LRTP and TIP? What methods are used to identify imbalances?

89. How does the planning process utilize demographic information and does the agency have an analytical process in place to examine the distributions across minority and low-income populations of the benefits and burdens across all socio-economic groups examined in the modeling and planning processes used for the long-range plan and TIP?

90. Are the products of the planning process developed in such a way that the benefits and impacts of projects do not adversely affect economically disadvantaged groups?

East-West Gateway is actively involved on a daily basis in the African-American and low-income communities in the region through three important initiatives: the St. Louis Regional Jobs Initiative, the Regional Strategy for Access to Jobs, and Bridges to Work. We use our engagement with citizens in these efforts to identify their transportation needs.

The St. Louis Regional Jobs Initiative is a multi-year effort convened locally by East-West Gateway and funded by the Annie E. Casey Foundation and other public and private partners. Through the Jobs Initiative, low-income young adults can access education, job training, and other support services to enable them to find – and keep – good jobs. Approximately 1,500 are served on an annual basis. Information about transportation barriers is regularly sought as part of the intake, assessment, and case management process. The Jobs Initiative is located at the Metropolitan Education and Training (MET) Center, adjacent to the Wellston MetroLink station – which ensures easy access. As part of its commitment to assisting former welfare recipients in preparing for and finding work, the Jobs Initiative also supports eight satellite locations, which are churches in predominantly African-American neighborhoods in the City of St. Louis. Transportation is provided from each of the churches (through a JARC grant) to the MET Center and another job training location, and “mobility counselors” are available at each church to help clients develop sustainable transportation plans. These counselors have been trained by Jobs Initiative and East-West Gateway staff to handle a number of transportation related questions,
based on problems that have been described to us by other members of this group. East-West Gateway’s video production, “A Day in the Life of Me,” depicts some of these issues. A copy is available upon request.

Also located at the MET Center is East-West Gateway’s Bridges to Work program, which oversees two reverse commute projects (one from the Hanley Road MetroLink station to Earth City in west St. Louis County and one to St. John’s Mercy Medical Center, also in St. Louis County) and provides information about suburban job openings, transportation services and advice to clients at the Center and residents of the largely African-American communities surrounding the Center. In 2004, Bridges sponsored its first “Mobility Fair,” which they hope to have as an annual event. Resource persons at the Fair included representatives of legal services, child safety seat advocates, law enforcement officials, Metro transit, and auto inspection.

The Regional Strategy for Access to Jobs takes East-West Gateway staff in the community to assist organizations and groups in developing innovative transportation solutions for low-income persons, many of whom are African-American or disabled. Some of the groups we work with on a regular basis that serve African-Americans, other racial and ethnic minorities, and low-income individuals include Metro, Madison County Transit, Monroe - Randolph County Transit, Better Family Life, Employment Connections, St. Louis Agency on Training and Employment, the International Institute, Provident Counseling, Lessie Bates Neighborhood House, and more. The principal groups we work with who serve persons with disabilities include Challenge Unlimited, Paraquad, Rehabilitation Services for the Blind, St. Louis Brain Injury Foundation, and Metro.

In addition to these ongoing initiatives, in 2004, East-West Gateway is launching a “We’re Listening Tour” in which staff will go out in pairs of two to conduct intercept interviews in public locations and to engage in dialogue with groups – including neighborhood locations and groups of African-Americans and low-income persons. We have compiled an extensive list of community-based organizations, not-for-profit agencies, and pan-Hellenic organizations for this purpose. An interview protocol and a set of dialogue questions are currently being developed by staff.

During corridor and long-range planning processes, extra care is taken to reach out to minority and low-income communities. That extra care ranges from using the networks developed by East-West Gateway to make contacts in communities to hiring special consultants to assist in soliciting community involvement and input.

East-West Gateway uses GIS-based analytical techniques to assess the distribution of impacts. In regional assessments, the evaluation typically involves a simple process of overlaying analytical data on maps indicating EJ sensitive communities and calculating the relative impacts or benefits within those communities as compared to non-EJ communities. This is done for accessibility/mobility indicators, preservation needs, safety conditions, physical impacts, and investment patterns.

Most of the major projects in the region are developed through corridor studies, primarily Major Transportation Investment Analyses. These studies involve detailed demographic analyses and assessments of Environmental Justice issues. The approach taken in those studies is to identify
potential effects, both positive and negative, on minority and low-income communities and to screen out investments that have disproportionate impacts on those communities. As a result, by the time a major project is advanced to the plan or TIP, a rigorous examination of EJ issues has already occurred.

91. How has the 3-C process been utilized to implement and assure continued compliance with ADA requirements?

Compliance with ADA falls more squarely in the lap of project implementers than planners. East-West Gateway has become increasingly involved in these issues in recent years, however, as concerns have been brought to us by persons with disabilities who have been a part of our planning process. We have engaged in numerous conversations with them, which have resulted in the following actions by the agency.

a. Staff convened a meeting of public works directors from through St. Louis City and County to review the status of ADA regulations and guidelines and to hear the concerns of persons with disabilities regarding pedestrian access and safety in intersections and public rights of way in the region. We hope to sponsor more of these dialogues in the future.

b. Staff arranged for a panel of persons with disabilities to participate in the TIP project development workshop held in January 2004. These advocates reviewed project proposals and advised sponsors on how to modify projects to improve accessibility.

c. Staff prepared a publication entitled “St. Louis Regional Accessibility: Supporting Full Community Participation,” which includes an analysis of 2000 Census data on persons with disabilities in the region. We use this as an educational tool to inform transportation and other decision makers about mobility needs of persons with disabilities.

d. Staff has been vocal in the community about the importance of ADA compliance in privately-owned capital projects that are built with public tax incentives. Currently in the state of Missouri, local and state agencies do not monitor publically-subsidized projects for accessibility.

e. As part of the long-range plan update, East-West Gateway has contracted with the Starkloff Disability Institute to develop and implement a process to ensure that the transportation needs, perspectives, and priorities of persons with disabilities are considered in the plan update now underway.

PUBLIC INVOLVEMENT:

92. What is the public involvement process and who is responsible for its implementation?

Since the adoption of Transportation Redefined nearly ten years ago, East-West Gateway staff have experimented with a variety of activities and techniques to ensure that citizens can and will
have input into transportation planning and problem-solving activities. These activities were developed from three specific kinds of interaction: communication, consultation, and cooperation in planning. Activities targeted a wide range of transportation customer groups, including neighborhood residents, commuters, transit users, local officials, business persons, educators, freight handlers, organized labor, persons with disabilities, immigrants, developers, and more. In 2004, a fourth category was added to our public involvement plan: community-based outreach. This category specifically targets the most difficult to reach groups: low-income persons, persons with disabilities, and older adults.

A revised and updated four-part “Strategy to Engage Citizens in Regional Problem-Solving” was presented to the Executive Advisory Committee and the Board during the regular monthly meetings in June 2004. A copy is attached (see Attachment 4). Implementation of the strategy is a cooperative, interdepartmental process involving staff of the departments of Transportation, Planning, and Policy/Community Development.

93. How do the public involvement activities, which are conducted throughout the metropolitan planning process, influence transportation investment decisions and policies of the states and the public transit agencies?

Representatives of the state transportation agencies and Metro have seats at the table of the Transportation Planning Committee, the Executive Advisory Committee and the Board of Directors. In these venues, they benefit from reports that are given concerning citizens’ needs, interests, and priorities, as they have been articulated through the metropolitan planning process. Additionally, some transportation studies are jointly undertaken between the MPO, Metro, and the states (major corridor studies, for example), and in these instances the process to engage the public is a shared process.

94. Is the process effective in obtaining input from all segments of the community?

East-West Gateway has made an effort to obtain input from all segments of the community. Certainly, we can certainly always do better and we strive to do so.

95. Are freight shippers and transit users given the opportunity to comment?

Yes.

96. What opportunities do private enterprises have to participate in the planning process?

The involvement of businesses and employees is solicited in all corridor studies, Access to Jobs project planning efforts, and for every TIP and long-range plan workshop and open house. In addition, East-West Gateway maintains active, ongoing, and cooperative working relationships with the region’s two major chambers of commerce / economic development agencies – the Regional Chamber and Growth Association and the Leadership Council of Southwestern Illinois. Agency staff and Board members exchange perspectives on transportation policies and projects on a regular basis. Representatives sit on the Executive Advisory Committee and the Transportation Planning Committee.

97. What public involvement procedures are used by the transit operators?
As with East-West Gateway, the transit operators use a variety of techniques depending on the specific planning being conducted. The question would best be presented to the transit operators.

98. Does the public involvement process have an identified strategy for engaging minority and low-income populations?

Yes. Please refer to the Strategy to Engage Citizens (Attachment 4): “We’re Listening” (page 3), The Regional Strategy for Access to Jobs (page 5), and community-based outreach to low-income workers and job seekers (page 6). This strategy is more fully described in the answer to question 92.

99. Has public involvement been routinely evaluated?

Yes, but not agency wide. This is an area for improvement, which has been at least partially addressed in the Strategy to Engage Citizens now in circulation.

100. Have organizations representing low-income and minority populations been consulted as part of the evaluation of the public involvement process?

Yes. And organizations representing persons with disabilities, as well.

101. Have efforts to improve involvement been undertaken?

Yes. New activities in our strategy to involve the public include the web-based and community-based “We’re Listening” tours, a new “How We See It” survey (see Strategy page 4), opportunities for citizens to bring concerns directly to the Executive Advisory Committee (see Strategy page 3), and a series of activities referred to as “community-based outreach” (see Strategy page 6).

102. How does the public involvement process demonstrate explicit consideration and responsiveness to public input received during the planning and program development process? What kind of feedback does the public receive on the proposals and questions they put forward?

Except for comments provided at open houses and other public meetings where staff is available to talk at length with the public about their questions and concerns, all telephone calls, letters, emails, comments, etc., are responded to as promptly as possible in a form appropriate to the method of contact (i.e., phone calls are returned; written comments are responded to with letters or emails). In responding to the public, staff endeavors to answer questions and concerns thoroughly – often spending extended periods of time on the phone, writing lengthy, detailed letters, or arranging personal or organizational meetings to provide a more comprehensive response. While staff expends significant effort to understand public concerns and address those concerns by modifying plans, programs, and processes, East-West Gateway typically does not compile a list of modifications and corresponding public comments. In most cases
such a list would be as misleading as enlightening. The proof of the agency’s responsiveness is the final product.

What mechanisms are in place to ensure that issues and concerns raised by low-income and minority populations are appropriately considered in the decision-making process? How have any such concerns been addressed?

While East-West Gateway makes special attempts to reach out to low-income and minority populations, no mechanisms except those used for the general population are employed to ensure that their views are appropriately considered. We assert that all comments and opinions are valued in the planning process. No concerns about our responsiveness to low-income or minority populations have been raised.

Have any local groups come forward with specific needs and was funding made available by the MPO to address and study these needs?

Yes, persons with disabilities have come forward with specific needs and interests. Funding has been dedicated to a special community-based outreach effort in response. A copy of the scope of work is available on request.

103. What efforts have been made to engage low-income and minority populations in the certification review public outreach effort?

We have made contacts through our networks, distributed notices to recognized leaders in those communities, and advertised in the minority newspaper of record.

104. Does the public outreach effort utilize media targeted to low-income and minority populations?

East-West Gateway does use media targeted to low-income and minority populations, especially the St. Louis American, the minority newspaper of record, and minority radio stations.

105. What issues were raised, how are their concerns documented, and how do they reflect on the performance of the planning process in relation to Title VI requirements?

No major Title VI issues have been raised.

106. Have primary languages other than English been identified as substantially used within the minority or low-income areas?

English is the primary language.

CONFORMITY AND AIR QUALITY PLANNING:
107. For which pollutants is the area nonattainment or maintenance? (Although the 8-hour SIP is not in place, please include 8-hour information to the best of your ability based on designations that are, or will be done in 2004.)

The entire eight county region has attained the one-hour ozone standard and has been classified as a maintenance area for the one-hour ozone standard. On June 15, 2004 U.S. EPA designated the eight county St. Louis region (Missouri-Illinois) and Jersey County, Illinois as an eight-hour ozone standard non-attainment area. The area has until 2010 to show attainment of this standard. A portion of the region, consisting of the City of St. Louis and that section of St. Louis County within I-270 is classified as a limited maintenance area for carbon monoxide. The St. Louis area is in attainment for all other pollutants.

108. Describe roles and responsibilities of all organizations responsible for air quality monitoring and analysis. Are these established in up-to-date formal agreements?

The Illinois Environmental Protection Agency (IEPA) operates six ozone emissions monitors in the Illinois portion of the region. The MDNR operates three ozone emissions monitors in the area. Under a delegation agreement with MDNR, the Air Pollution Control Program of the St. Louis County Department of Health operates five ozone emissions monitors. Under a delegation agreement with MDNR, the Air Pollution Control Program of the City of St. Louis Department of Health operates three ozone emissions monitors.

In the Ozone Data Sharing Project, the East-West Gateway Council of Governments (EWGCOG) acts as a clearinghouse for ozone information collected by the above network of monitors. The participating agencies transmit information to EWGCOG. This information is examined for: missing values; problems; exceedances of the one-hour ozone standard; excursions of the eight-hour ozone standard; and maximum eight-hour ozone average by monitor. The ozone data is then entered onto an electronic spreadsheet program.

MDNR and IEPA are responsible for analysis and evaluation of monitored data, compilation of data, emissions modeling and preparation and implementation of State Implementation Plans (SIPs). EWGCOG is responsible for preparation of the Transportation Element for each State’s SIP. EWGCOG has primary responsibility for preparing the area’s Conformity Determination on an as needed, typically annual basis. These agency responsibilities were delineated in federal regulations.
109. How do the nonattainment boundaries compare to the MPO planning area boundaries? (For 1-hour and 8-hour ozone)

The boundary of the St. Louis one-hour ozone maintenance area is the same as the MPO planning area boundary. On June 15, 2004 U.S. EPA designated the eight county St. Louis region (Missouri-Illinois) and Jersey County, Illinois as an eight-hour ozone standard non-attainment area. Jersey County is not within the MPO planning area boundaries.

110. What adjustments were, or will have to be, made to the network model to account for this difference?

No adjustments are necessary.

111. What steps, if any, have begun relative to the development of an 8-hour ozone State Implementation Plan (SIP), control measures affecting transportation, and motor vehicle emissions budgets?

The SIP development process has just started. In June 2004, IEPA, MDNR and EWGCOG met to develop a modeling protocol which will be used for preparing the Attainment Demonstration SIP for each State and delineate roles and responsibilities for the participating agencies. Missouri and Illinois have begun work on developing their 2002 emissions inventory.

112. Are there differences between emissions inventory submitted to U.S.EPA as part of the SIP and the emissions inventory used as the basis for the conformity determination? If so, why?

No. One of the primary functions of the Inter Agency Consultation Group (IACG) is to ensure that planning assumptions and data collection is consistent between MDNR, IEPA and EWGCC.

Are there differences between the traffic volumes reported to FHWA through HPMS and the volumes used for conformity purposes? If so, why? What steps are being taken to ensure that the State will use consistent traffic volumes to develop the emissions inventories and budgets in the next SIP that will be developed to meet the new ozone and the PM2.5 quality standards?

There have been minor differences in vehicle miles traveled (VMT) estimates used in Conformity and the traffic volume estimates generated by the Highway Performance Monitoring System (HPMS). However, enhancements to the local HPMS and increased coordination among partner agencies have minimized these differences. An ad-hoc VMT working group, consisting of representatives from the Missouri Department of Transportation (MoDOT), MDNR and EWGCC, has periodically met to resolve the differences in VMT from HPMS and on-ground monitoring. Also, the IACG has an active role in maintaining quality control and consistency in all aspects of mobile source data collection.
113. What procedures are in place for interagency consultation in the conformity? When in the process does interagency consultation occur? How often does the group meet?

Interagency consultation occurs throughout the Conformity Determination process. The procedures are delineated in the Missouri Transportation/Air Quality Conformity SIP and the federal Conformity rule. The primary mechanism is the Inter Agency Consultation Group (IACG). The IACG meets on a monthly basis that insures timely participation and coordination by all partner agencies. The IACG is composed of representatives from: EWGCC, Chair of Group; MDNR; IEPA; MoDOT; Illinois Department of Transportation; U.S. Environmental Protection Agency Regions V and VII; Federal Highway Administration, Missouri and Illinois; Federal Transit Administration Region VII; St. Louis County Air Pollution Control Program; City of St. Louis Air Pollution Control Program; St. Louis County Highways and Traffic Department; Madison County Highway Department; St. Clair County Department of Roads and Bridges; Bi-State Development Agency; Madison County Transit District; and St. Clair County Transit District. Some of the items discussed include: planning assumptions: tests to be performed as part of Conformity Determination; emissions budgets and 1990 base emissions inventory to be used; SIPs to follow; and review and comment on Conformity Determination.

114. What are the procedures for public consultation in the conformity process? When in the process does public consultation occur?

Public consultation for the Conformity Determination occurs in conjunction with the public review and comment period for the Transportation Improvement Program (TIP) and/or Long Range Transportation Plan. The Conformity Determination report is mailed to air quality consultees and is posted on the EWGCC web site. Copies of the report are also available at the TIP and Air Quality Conformity Determination Open Houses held through the St. Louis region. The Air Quality Conformity Determination has a 30-day review and comment period. In addition the Air Quality Advisory Committee, which meets monthly, has an active public participation role in overseeing the development of the Conformity Determination.

115. Has it ever been necessary to drop out one or more projects from either the LRTP or the TIP in order to show conformity?

No.

116. What procedures are in use to estimate VMT from projects that are not regionally significant or are not otherwise required or able to be modeled?

For projects that are incidental to the development and use of land in a manner consistent with the population and employment forecasts, the VMT resulting from the project and resulting emissions are already represented in the network analysis through the estimation of centroid connector and intra-zonal VMT and no further analysis is required. However, when non-exempt projects are subject to supplementary emissions adjustment the regulations require that emissions from projects which are not regionally significant, but which have an effect on vehicle travel, should be estimated in accordance with reasonable professional practice. Since these projects vary widely in scope and potential impact on travel and emissions, a number of different approaches have been identified below.
Projects associated with land use developments of regional impact. Some projects are associated with land use developments that have regional impact but are not reflected in the population and employment forecasts. In these cases, an estimate of VMT attributable to implementation of the transportation project is made using standard site impact analysis methods, supplemented by information supplied by the project sponsor.

Projects considered to have potential for significant change in VMT. The potential impact on emissions of projects involving new or expanded capacity on roads that are not in the regional travel demand model network is determined through a review of the location and function of the project, supplemented by information from the project sponsor. If this review suggests there is potential for significant change in VMT as a result of the implementation of the project, that change in VMT will be estimated using data supplied by the project sponsor.

Changes in transit service, park-and-ride facilities, rideshare or other programs, which have a potential negative emissions impact. These are projects have the potential to cause significant increases in VMT as a result of the discontinuance or other change to transit service, park-and-ride facilities, rideshare or other programs. The change in VMT is estimated using data supplied by the project sponsor.

In all cases, having determined the effect on VMT, the resulting emissions are computed using the “Off-Net” model software developed in 1998 for use in the St. Louis region by Cambridge Systematics.

117. What is the tracking process to ensure that air quality beneficial projects are actually built and not carried over from one year to the next to ensure conformity?

As part of the conformity process, East-West Gateway has to certify that TCMs in the categories included in the 15 Percent Rate-of-Progress SIPs which are eligible for federal funding are on schedule for implementation and that no federal funds are being diverted from these projects which might delay their timely implementation. The basis for this certification is contained in the 1997 report, *Transportation Control Measures in the St. Louis Region: Completion Report*. All projects contained in TIP are routinely tracked as part of the reasonable progress process, and some TCMs are carried over. Changes in TCM schedules are adjusted and accounted for in the conformity finding.

118. What transportation improvements and actions will are expected to contribute the most to emission reductions?

Transportation projects that can be implemented on a regional scale (i.e., enhanced vehicle inspection and maintenance program, MetroLink, bus replacements) produce the greatest air quality benefits.

119. Has the air quality conformity process caused the region to rethink it long range transportation planning and priorities? If so, how?
Although the transportation/air quality conformity determination is an important element in the transportation planning process, and Resource Conservation, which includes air quality, is one of the seven priority areas of the LRTP, the conformity process has not caused the region to reevaluate its approach to transportation decision-making.

OTHER ISSUES

120. Does East-West Gateway do community planning for housing or other non USDOT programs?

East-West Gateway is involved in community and regional planning for homeland security, workforce development, Brownfield remediation, water resources, air quality, all-hazard mitigation, tax policy, and more. We do not do any planning for housing per se, but we participate in regional efforts led by other groups to promote and improve affordable housing, homeownership among first-time buyers, lead paint removal, and to discourage predatory lending.

121. Describe East-West Gateway’s involvement with welfare to work activities, including Access to Jobs.

East-West Gateway is closely involved with the workforce development side of welfare to work activities in the region. Staff involved representatives of the relevant state and local agencies charged with implementing welfare reform in the development of the Regional Strategy for Access to Jobs. We refer to the core elements of this regional strategy as “LEARN+WORK LINK,” because it focuses primarily on improved access to education, job training, and work opportunities along the MetroLink light rail and integrated MetroBus service. East-West Gateway has developed working relationships with more than 20 businesses, educational, human service, and transportation agencies for the purpose of building and implementing this strategy.

The projects that we have jointed developed and funded with federal transportation and matching dollars to carry out LEARN+WORK LINK to date include the following, which involve several different implementers:

- Cooperative Healthcare Employee Transportation (CHET) service from the Hanley Road MetroLink station and Florissant Valley Community College to employment at St. John’s Mercy Medical Center
- Bridges to Work service from the Hanley Road MetroLink station to the Earth City Business Park, Harrah’s Casino, and other destinations in Maryland Heights
- Chesterfield Connector Service from the Ballas Road Transfer Center to jobs in the Chesterfield Valley
- Special late night and weekend service on six Metro routes in underserved areas of the City of St. Louis and St. Louis County
- Evening and weekend service for persons with developmental disabilities to job sites in Madison and St. Clair counties
- Reverse commute service from downtown St. Louis to three employment activity centers in Madison County, Illinois
“Travel training” for persons with disabilities that are learning to use regular fixed route service.

Evening transit service to and from job training classes at a local college

Transportation to and from training classes and jobs from eight church parking lots in the City of St. Louis.

Expansion plans include service to and from a location near the International Institute in south St. Louis City, transportation to the Sauget Business Park in St. Clair County, and service for low-income workers in Monroe County, Illinois, which has extremely limited existing service.

Additional information on our involvement in welfare to work is included under the response to Question 92.

122. Are EWGCOG/local governments aware of the TCSP Pilot program? Is there local interest in the National Corridor Planning and Development Program? Are there any plans to submit applications for these programs?

East-West Gateway and at least four local governments have received TCSP grants. There was early interest in the National Corridor Planning and Development Program relative to the Avenue of the Saints, but that interest subsided when the region was not awarded a grant. There are no immediate plans to seek additional funding under these programs.
APPENDIX C

Public Meeting Comments

Meeting Notes from the FHWA/FTA MPO Certification Public Meeting
July 20, 2004

The meeting started at 6:30 p.m. in the East-West Gateway Council of Governments Board Room.

Issues/Points of Discussion
Note: Items labeled, as comments are questions, comments, and observations from private citizens or groups. Items labeled as responses are answers, comments, and observations given by FHWA, FTA, and East-West Gateway staff members.

Comment – What is the 3C process?
Response – FHWA: This describes the certification review process: comprehensive (all inclusive), coordinated (involving multiple groups), continuous (ongoing; never “complete”)

Comment – Question about 153 separate items for review.
Response– FTA: See the Web site for more information on the questions and answers.

Comment – How does the FHWA and FTA ascertain whether or not public involvement efforts are adequate and effective?
Response– FHWA: There is more emphasis on being proactive in public involvement programs now than in the past. The public is involved earlier in the process now than in the past. This is a dynamic, not a static process.

Comment – With regard to certification, how does East-West Gateway compare to other MPOs in the U.S.?
Response– FHWA: The certification rate for MPOs is about 95%. No problems recently, but the Atlanta and Boston MPOs had some process problems early in their history.

Comment – Is it the process, not East-West Gateway that is being reviewed?
Response– FTA: Basically, yes. However, the federal agencies’ procedures are also under scrutiny. The certification review recognizes and accounts for other players in the process. As far as the state DOTs are concerned, there is no requirement for DOT certification as there is with the MPO, but the review can identify areas in which a DOT can improve. While the MPO is the primary focus of the review, there are good opportunities for exchanging information among all parties.
Comment – Can the MPO comment on the federal agencies’ report?
Response – FTA: Yes, the MPO can comment on the draft report. The review process is not an audit, per se, but rather the result of regulatory requirements. The review process is facilitated by the established relationship between FHWA and East-West Gateway staff based on regular contacts and interfacing.

Comment – Compared to other elements of the planning process, public involvement tends to be less quantitative and more subjective. Do the federal agencies have concepts of what they expect with regard to public involvement?
Response – FHWA: An example of an effective public involvement program is the Planning Collaborative Initiative. The Washington, DC office has more information and material on this. Also, there are public involvement techniques on the FHWA and FTA Web sites. East-West Gateway has a new “we’re listening” feature on its Web site. This link is open for comments now, and EWG will present it to the Board of Directors at the board meeting in September. An additional comment: There is a greater emphasis on being inclusive in public involvement programs now concerning disadvantaged populations and from an environmental justice perspective.

Comment – Following are comments from Metropolitan Congregations United (MCU), a group that has become involved in TIP discussions over the past several years in an effort to advance the MO 30 (Gravois Road) resurfacing project in St. Louis County:
• Confusion: Members of MCU were told that the Gravois Road project was in the FY 2005-2009 TIP (scheduled for construction in 2008), then a review of the draft TIP revealed that the project was not in the TIP, then the group leaned the project was in the TIP after all. What’s the real story?
• Calls: East-West Gateway’s executive director only returned phone calls to MCU sporadically.
• Clarity: According to a newspaper article, there were projects that “shouldn’t have been in the TIP.” The group was unclear as to which specific projects the article referred to.
Good points: (1) East-West Gateway has a great Web site. (2) With the help of federal and state legislators, MCU has been successful at getting the Gravois Road project advanced in the program. East-West Gateway was praised for listening to the group’s concerns.

Comment – Many times, lay people come to public meetings unprepared and unsure of what they want. More lead time between the date a public meeting is advertised and when it is held would be helpful to allow people sufficient time to become familiar with issues and concepts.

Comment – Glad to have the Bicycle/Pedestrian Advisory Committee (BPAC). Need some clarification. FHWA guidelines state that bicycle and pedestrian facilities will have due consideration. Legacy 2025 (long-range plan) is going in the right direction concerning bike/ped issues, but the actual Bike/Ped Plan doesn’t go far enough toward giving bike and pedestrian facilities due consideration.
Response – FTA: The key word is “consideration.” This means that projects should consider incorporating bike and pedestrian facilities as much as possible, but there is no implementation requirement. East-West Gateway: The Bike/Ped Plan presents design environments and design options. Also, earlier this year, during the time following the local project
development workshop and before applications for STP-S funds were due, EWG held an expert panel review workshop. At this workshop, panels of experts from the bike/ped community, the disabled community, IDOT local roads group, and MoDOT local roads group were available to review project concepts and make recommendations as to how sponsors could improve projects in these areas. This was a more proactive approach than in previous years. You can’t force sponsors to incorporate bike/ped elements; that’s the disconnect between the “due consideration” guidelines and real situations.

Comment – Other MPOs have education and outreach programs that have helped to bring bike/ped issues to the forefront. The MPO needs to be the “process leader” in this area.

Comment – Bike/ped facilities and issues are not universally popular throughout the region (for example, in Jefferson County). Jefferson County needs money to make existing roads safer, and it’s hard to explain to residents of Jefferson County why a portion of the region’s money is going toward building bike/ped facilities.

Comment – Roads everywhere can incorporate wider shoulders to accommodate bikes and pedestrians.

Comment – Will the report from the federal agencies address the bike/ped issue?
Response – FTA: The report will address all comments presented at this meeting. Also, the certification review participants can discuss this issue as time and circumstances allow over the next day and a half.

Comment – Monroe County residents generally share the view of Jefferson County residents toward bike/ped facilities. This issue also is tied to the topic of land use.

Comment – Thought the participants in the public meeting would talk about the process more than about specific projects and issues. Here are some concerns about the process:

- Saw no notice in the media about this meeting. Heard about it through word of mouth. How do we improve getting the word out to citizens?
- Citizens also have a responsibility to get involved in issues they feel are important to them.

Response – East-West Gateway: Turnout at public meetings depends on the specific issue. The more an issue has the potential to have a direct effect on people, the more likely they are to come to a public meeting and participate. For this meeting, East-West Gateway sent out mailings, publicized the meeting on the EWG Web site, and sent press releases to the local newspapers. Citizens can check the EWG Web site for these kinds of events.

Comment – Jefferson County is divided with respect to newspaper coverage. Residents of the east side of the county get one newspaper, and the west side residents get another. There is no comprehensive source for this kind of information, and it’s often difficult to get people interested.

Comment – Which projects must be included in the TIP?
Response – FTA: All projects that receive federal funding or that are regionally significant from the standpoint of air quality must be included in the TIP.

Comment – Example of a project that doesn’t get federal funds but that would seem to have regional air quality implications: Hanley Road south of I-64 in St. Louis County.
Response – East-West Gateway: We’re aware of this “project,” but it’s not a real project yet. The county has gone through the design process and public involvement activities so far for the first phase; the second phase hasn’t gone through this process yet.

Comment – Should this be part of the TIP process?
Response – East-West Gateway: For such projects that could have regional air quality impacts and propose to use local funding, sponsors are required to complete a “non-federally funded project disclosure form.”

Comment – How quickly could such a project advance?
Response – East-West Gateway: This specific project will not be able to advance until the county considers the implications of I-64 reconstruction in the area. MoDOT has no construction funds programmed for reconstruction of this part of I-64 in the current TIP.

Comment – How does “piecemealing” of projects figure in? For example, the City of Maryland Heights is building the Maryland Heights Expressway using local money generated from casino operations (no federal funds). Some members of the city council were not aware of this project. Also, MoDOT was not aware of this project to the extent that the project affected the mitigation of impacts of the Page Avenue project on the Creve Coeur Lake Park in the area. Meanwhile, the city is applying for federal funds for other local projects when it has enough local money to pay for these projects entirely. The perception is that the city is not asking for federal money on the Maryland Heights Expressway project to circumvent the TIP process. What are the ethics involved in such an approach?
Response – East-West Gateway: MoDOT may get involved in the Maryland Heights Expressway project at the city’s request. This project was in the TIP a couple of years ago, so it was included in the regional air quality model.

Comment – Concerning public involvement: people come to public meetings for several reasons: (1) they’re angry, (2) they want to get information, (3) they want to influence policy.
Response – FTA: The public involvement process must address people’s expectations. How will people’s input be used?

Comment – In Kansas City, the MPO sponsors fairs and events aimed at disadvantaged populations to promote public awareness of transportation issues. Suggestion that East-West Gateway do these kinds of things too.
Response – FTA: An effective program in Kansas City is the Corporate Challenge (a field day for grownups) that features sports events and helps raise funds.
FHWA: Another example is the Bike to Work Rally Day in Washington, DC.
East-West Gateway: We support these kinds of activities; other groups in the St. Louis area are already doing these kinds of things (e.g., Trailnet, Citizens for Modern Transit, and the Bike Federation).

Comment – There’s the opportunity for East-West Gateway to partner with these groups in sponsoring and coordinating these activities.
Response – FTA: In Kansas City, Mel Henderson and Marlene Nagel are contacts for more information about these kinds of events.

Comment – St. Louis is such a fractured area with its multiple municipalities. East-West Gateway needs to be the leader to focus efforts and get municipalities and groups working together.

Comment – The elected officials that make up the membership of the East-West Gateway Board of Directors have their own parochial visions and interests. What is the dynamic between the board members (subjective views) and the East-West Gateway staff (objective views)?

Response – East-West Gateway: To accomplish anything, the board must rely on EWG staff for information and analysis. The board trusts the EWG staff and typically acts in full consensus when considering and approving the TIP and its amendments as well as other initiatives.

Response – FTA: As a wrap-up, citizens are invited to give the group suggestions for getting the word out to the public about upcoming public meetings.

FHWA: With regard to the concerns of Jefferson County residents about bike/ped facilities, the Surface Transportation Program under TEA-21 requires that 10% of STP funds be set aside for transportation enhancements. This 10% is taken off the top.

Comment – There is not enough money to upgrade highways. In Jefferson County, many roads are traditional wagon trails that have been paved over the years. It’s hard to tell parents that their child has died in a car crash.

Response – FHWA: Safety is an important focus area. However, funding constraints limit the amount that can be done to address this area. Nothing happens fast enough.

The meeting closed at about 8:15 p.m.
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St. Louis Regional Bicycle Federation
Comments for Federal Certification Review, July 20, 2004
East West Gateway Council of Governments

Dear Mr. McMahon:

The St. Louis Regional Bicycle Federation is a 501c3, all-volunteer organization devoted to improving the environment for cyclists in the same region as served by the East West Gateway Council of Governments. We are represented on the EWGCC Bicycle/Pedestrian Advisory Committee.

The members of the Federation share the belief that:

✦ Under federal policy, and the laws of Illinois and Missouri, bicyclists have the same rights to the region’s roadways and the same obligations as motorists.
✦ Increasing the mode share for cyclists provides the opportunity to improve air quality, to raise the level of public health, and enhance the livability of our region.
✦ The ability of citizens to bicycle in relative safety is an issue of economic justice, the poor and recent immigrants in particular cannot necessarily afford other means of transportation. We owe these citizens the right to safe travel.
✦ Funds for safety should be allocated in proportion to the death/injury rates per mode.
✦ Bicyclists and pedestrians represent approximately 10 percent of Missouri fatalities, yet funding for these modes is closer to 1-2 percent.
✦ The region served by East West Gateway includes over 90 municipalities. The agency has a natural position as a leader in promoting cycling and serving as an example to its constituent municipalities.

Since the last FHWA/FTA review, we have been encouraged by a number of developments, most notably, the commencement of work within EWGCC on a regional bicycle/pedestrian plan. We are pleased with the open process and the concern for the quality of the ultimate product. We have also been pleased with the role of East West Gateway in considering the concerns of cyclists on a number of projects. In general, we believe that the interests of cyclists are being considered by staff and this bodes well for the people who bicycle in the region.

However, in discussions with cyclists throughout the country, we are struck by the increasingly active roles that MPOs are taking to promote bicycling.

A few examples:
✦ Programs for the Washington DC MPO include coordinating a regional bike-to-work day event and a regional pedestrian (and bicycle) safety awareness media campaign. The 2004 event included at least 17 Bike to Work rally sites throughout the region and 4,400 registered participants. The MPO publishes a regional bicycle commuting guide. MPO GIS staff recently added a bicycling layer to its on-line regional commuting map. In May, the MPO coordinated eight Walkable Community Workshops funded through a NCWB award.
✦ The Northwestern Indiana Regional Planning Commission facilitates a region-wide citizens advocacy group and coordinated the production of a first-ever regional trails map highlighting all on- and off-road routes in the three counties they cover. The committee has also put forward a priority map which highlights all potential areas for trail development.
✦ The Milwaukee Deputy Director of the MPO recently suggested a biannual CMAQ TDM package of $250,000. He said that the renewable package would fund bike to work, ride share and pedestrian advocacy efforts. Then he offered the services of the MPO in printing the bike to work materials for free.
✦ Metropolitan Orlando has done a bicycle users guide map (with bicycle level of service, bike lanes, paved shoulders, paths, etc.). It’s on the web, with planned distribution in stores. They are also in the process of hiring a marketing/outreach person to determine how to best distribute bike education materials and promote bicycling courses.
The Mid-America Regional Council promotes walking and bicycling in the urban environment through Heartland Sky, and through its Creating Quality Places initiative to foster sustainable communities. Explore KC is the Mid-America Regional Council’s campaign to promote the exploration of the Kansas City region by foot or bicycle while trying to increase the number of citizens that bike or walk to work, school and other destinations, and for exercise. One of the ways Explore KC plans to achieve these goals is by partnering with community-minded organizations like Kansas City Corporate Challenge (KCCC).

The San Antonio MPO sponsors Bike & Bike Month. The Bicycle Mobility Task Force (BMTF) advises the MPO Transportation Steering Committee on bicycling issues for the metropolitan area. The BMTF's goal is to increase bike ridership by creating a safe and effective network of on and off-road bikeways throughout the region. Mobility 2025 set a goal of approximately $1 million/year for bicycle projects for the MPO area.

Recently the Charlottesville/Albermarle Metropolitan Planning Organization (Charlottesville MPO) submitted a letter to the VDOT Commonwealth Transportation Board seeking improvements in bicycle and pedestrian facilities calling for the following improvements: Routinely accommodate bicycling and walking; Equalize the local/state cost share for bike/ped accommodations to be the same as that for automobile facilities; Allow bicycle or pedestrian facilities to be installed even when a road is not otherwise improved; Set aside dedicated state funding for bicycle and pedestrian retrofits on existing roads; Implement an objective and open process for limiting bicycling on controlled-access highways; and Establish construction-quality level citizen committees to help VDOT with the planning and development of bicycle and pedestrian facilities. The seventh position also advocated by the MPO is, "VDOT should provide functionally equivalent alternative bicycling and pedestrian facilities when road projects result in the loss of bicycle or pedestrian access."

The Bicycle Task Force holds a voting position on the Executive Staff of the Chattanooga Area Metropolitan Planning Organization for Transportation Planning (MPO).

The Mid-Ohio Regional Planning Commission this Thursday will adopt an accommodation/complete streets policy. MORPC was key to getting CMAQ funding for bike racks on buses which are going to be rolled out on all Central Ohio Transit Authority buses in September and is on the bus bike rack rollout task force. MORPC is also a sponsor of CarFree Day every year.

The Cleveland-area MPO -- NOACA (Northeast Ohio Area Coordinating Agency) -- is a progressive MPO that adopted a routine accommodation/complete streets policy last fall.

This is but a small fraction of the progressive efforts being taken by MPOs to improve the cycling environment. East West Gateway, with the work on its regional bicycle/pedestrian plan has taken important steps toward bettering conditions here. It is our contention that for the plan to be successful, East West Gateway must follow these examples and take a leadership role in promoting biking and walking. We urge FHWA to work with East West Gateway on implementing best practices and establishing benchmarks.

We also urge FHWA to work with East West Gateway to ensure that the laudable effort put forth on the regional bicycle/pedestrian plan becomes a reality. We hope you would set measurable goals for increasing mode share, safety and air quality. In addition, we renew the call we made in 2001 for East West Gateway to formally adopt the FHWA Policy Statement on Integrating Bicycling and Walking into the Transportation Infrastructure as a signal of the intention to continue the progress made in recent years. Other MPOs are adopting routine accommodation/completion streets policies and we urge EWGCC to do the same.

Thank you.

Bike Foster
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www.stlbikefed.org
APPENDIX D

EWGCOG ORGANIZATION CHART

Image No
Available