

INTER AGENCY CONSULTATION GROUP
Tuesday, October 25, 2016
East-West Gateway Board Room

Members Present:

Carol Lawrence, Chair – East-West Gateway Council of Governments
Stacy Allen - Missouri Department of Natural Resources
Mike Henderson - Missouri Department of Transportation
Heather Hamilton - U.S. Environmental Protection Agency Region 7 (Telephone)

Others Present:

Emily Wilbur – Missouri Department of Natural Resources
Kevin Jemison – Illinois Department of Transportation, District 8

Staff:

Mary Grace Lewandowski Lubna Shoaib Jason Lange Rodney Halbert

1 Call to Order

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

2 MoDOT's Draft Performance Measure Tracker of CMAQ Project Air Quality Benefits
- Mike Henderson, Missouri Department of Transportation

The 2012 MAP-21 transportation act contained requirements for the development of transportation performance management measures for safety, asset management and congestion mitigation and air quality (CMAQ) programs. These requirements were continued in the FAST Act. After four years, the element for safety was finalized. Performance management measures may transcend several federal transportation acts and with a new Administration there could be changes. By October 2017 the Missouri Department of Transportation (MoDOT) is to set an on-road mobile source emissions reduction target. As additional guidance is released, this target and/or method of measurement could change.

The FHWA has issued guidance, hosted conference calls and received a number of comments. The most recent guidance identified the pollutants to be addressed as oxides of nitrogen (NO_x), volatile organic compounds (VOC), fine particle matter (PM_{2.5}) and carbon monoxide (CO). The City of St. Louis and the part of St. Louis County inside I-270 are a CO limited maintenance area. Since a Conformity Determination for CO does not have to be done, will not need to track CO emissions. It is anticipated that FHWA may want the performance management measure report to include information by CMAQ project classes. They could be: transit; traffic flow improvements; demand management (trip reduction); shared ride; flexible work schedule; bicycle/pedestrian; inspection/maintenance and other transportation control measures; traffic management

plan; or experimental projects. FHWA has indicated that two year and four year total emissions reduction targets are to be developed for the applicable criteria pollutants.

In 2012, Mr. Henderson was assigned the task to prepare a performance management measure for the CMAQ program. Previous air quality measure dealt with monitoring data, not emission reduction associated with CMAQ projects. It was necessary to determine what could be used as a data source. Right now, the preliminary draft CMAQ report is in the form of a MODOT Tracker report. In the Tracker process, MoDOT staff present numbers on different programs and senior management asks what has been done to improve them. For CMAQ, the response is that MoDOT provides CMAQ funds to EWG and Kansas City.

Annually, MoDOT prepares a CMAQ fiscal year obligations and expenditures spreadsheet. EWG provides data on emissions reductions for each project. This spreadsheet could be used to prepare a CMAQ performance management measures report. For the preliminary draft report, summed the total VOC and total NO_x emission reduction benefits for 2013, 2014 and 2015 projects. When look at 2013 projects, there are VOC and NO_x reductions. For 2015, there appears to be a big NO_x reduction and good reduction for VOC. However, for 2014 projects, it appears that NO_x reduction was not as much. There were a number of bus replacement projects in 2013 but not as many in 2014. Also, in 2015 there were marine engine repowering projects which accounted for increase in NO_x reductions. The number and types of projects funded and the amount of funds available can vary from year to year. Next, began to consider what the emissions reduction target should be for each pollutant. The emissions reduction target can be set anywhere. The 2013-2015 total VOC emissions (short tons) were averaged and came up with 41.8 short tons for a target. This target might be too high. More discussion on emission reduction targets needs to occur.

Still trying to decide what this measure is supposed to show. It is a CMAQ project performance measure but the focus is on air quality not projects. It is possible that the report will include the different project classes instead of just reporting the overall total emissions reductions. Ms. Allen, Missouri Department of Natural Resources (MoDNR), suggested using a stacked bar chart to show the project classes funded in a particular year as that would be a way to explain differences. Ms. Lawrence, EWG, suggested adding the total number of CMAQ projects to the chart.

Ms. Shoalb, EWG, observed that this is a difficult measure as it is not like vehicle miles traveled (VMT) where a project is implemented and VMT changes. It has to be meaningful. CMAQ projects are not all the same. Suggested using a trend line or including a list of CMAQ projects EWG funded and note any change in the number of projects funded. It is a relative selection based on the types of CMAQ proposals received. Each project is different. Mr. Henderson, MoDOT, said that similar comments have been made on the national conference calls. This is not one-size-fits-all and it is not possible to compare region to region.

Mr. Lange, EWG, asked which would be a better measuring point, when funds for a CMAQ project are obligated or when project opens. He pointed out that just because bids are opened that year, does not mean area is receiving emissions benefit. In addition, when counting the emission benefits from CMAQ projects, need to avoid double counting as some projects listed in MoDOT's CMAQ spreadsheet may have been obligated the year before and are listed again for closeout purposes. Mr. Henderson, MoDOT, observed that if want to gage progress, have to look at monitoring readings, but no way to tie back to CMAQ program. All can do is make an estimation. Ms. Shoab, EWG, observed that weather can influence monitor values.

Mr. Henderson, MoDOT, said that FHWA may use this to figure out what type of CMAQ project brings them the best results for their funds. FHWA may be starting to question whether or not CMAQ is cost effective and should these funds be allocated elsewhere. For this report would need to come up with a specific year's worth of CMAQ projects authorized for construction or use MoDOT's CMAQ spreadsheet and check with EWG. Mr. Henderson wanted to start the conversation about this activity. It is his view that eventually, the CMAQ program performance measure will not be in the MoDOT Tracker report system but EWG will be reporting on this. Mr. Lange, EWG, offered to assist. Mr. Henderson, MoDOT, added that long range planning staff would need to be involved.

Ms. Allen, MoDNR, asked if there would be any consequences if the emissions reduction target was not met. Mr. Henderson, MoDOT, said that at this point there is no penalty. Guidance says for states to set targets wherever they want. The CMAQ notice of proposed rulemaking was just published earlier this year and the rule is not final. FHWA has committed to having guidance for CMAQ performance management measurement out in one year. By October 2017 each state is to set emissions reduction targets. Ms. Lawrence, EWG, added that the end of the comment period for this proposed rule but had been extended from August to October 24. Looking at the schedule for the other performance management measurement proposed rules, it could be 18 months before the CMAQ rule is finalized.

3 Status Report – FY 2017-2020 Transportation Improvement Program and Conformity Determination - East-West Gateway Council of Governments

The comment period for the draft Conformity Determination and draft FY 2017-2020 Transportation Improvement Program (TIP) ran from July 1 until August 10, 2016. There were five open house meetings and one on-line chat with a total of 128 participants. No Conformity comments were received. The EWG Board of Directors adopted the Conformity Determination and the FY 2017-2020 TIP at their August 30 meeting. U.S Environmental Protection Agency (EPA) Region 7 concurred with the Conformity finding. The OneDOT letter was received September 28.

Mr. Lange, EWG, said that in September he asked EWG's partner agencies if any had regionally significant projects that would need to be included in the TIP and would

necessitate rerunning Conformity. There does not need to be a mid-year (fiscal year) Conformity Determination.

4 Looking Ahead to Conformity Determination in Calendar Year 2017 - East-West Gateway Council of Governments

The next Conformity Determination will occur along with the normal TIP update in 2017.

In late September EPA began the adequacy review for the 2030 budgets from Missouri's redesignation request and Maintenance Plan for the 2008 ozone standard. Assuming that a finding of adequacy for use of these budgets in the Conformity Determination is going to occur sometime during the development of the next Conformity, 2030 will have to be added to the ozone analysis years (2020, 2025, 2030, 2035, and 2045). Analysis years 2025 and 2030 have budgets and have to be included in the regional emissions analysis and analysis years can be no more than ten years apart. Checked with EPA Region 7 to confirm that the Conformity for PM_{2.5} will continue to be done under the 1997 PM_{2.5} standard with an action/2002 baseline regional emissions analysis test. EPA identified the St. Louis region as unclassifiable/non-attainment for the 2012 PM_{2.5} standard so conformity under it does not apply.

Mr. Henderson, MoDOT, asked about the PM_{2.5} non-attainment status. Ms. Lawrence, EWG, said that the area is classified as non-attainment for the 1997 standard and unclassifiable/non-attainment for the 2012 standard. In 2018, the states can submit designation recommendations, based on 2015-2017 clean data, to EPA. Ms. Wilbur, MoDNR, said that Missouri had submitted a request for redesignation to attainment of the 1997 standard to EPA. EPA was unable to act on it due to problems with Illinois monitoring data. For the 2012 PM_{2.5} standard, Missouri recommended that the Missouri portion of the St. Louis area be designated as attainment. EPA again was unable to act on this recommendation. Once the 2015-2017 monitoring data is validated and a clean data designation is given by EPA, it is the view of Missouri that this area will be shown to be in attainment of the 2012 standard.

5 Other Business

Mr. Henderson, MoDOT, said that on October 27 there was going to be a meeting about the August 5 Presidential Order requiring that all Environmental Impact Statements (EISs) and Environmental Analyses (EAs) include a climate change analysis section. He asked if anyone else was aware of this new requirement. One way to do this is to prepare a programmatic analysis to be included in the long range transportation plan and then have a reference in EISs or EAs. Mr. Jemison, Illinois Department of Transportation (IDOT) asked Mr. Henderson for additional information.

Ms. Shoib, EWG, suggested that MoDOT find out the process other metropolitan planning organizations (MPOs) are using to prepare the CMAQ performance management measure and target development. Mr. Henderson, MoDOT, said that the states are working with interim FHWA guidance and final guidance could be different.

Mr. Henderson, MoDOT, asked if it would be possible to obtain the emission reduction estimates for years prior to 2013. Ms. Shoaib, EWG, said it would be difficult because projects in MOVES and travel demand network model runs are grouped by analysis years. Mr. Henderson, MoDOT, asked if an emissions reduction trend line would be of use. Ms. Shoaib, EWG, said that whatever is chosen, it needs to be easy to understand and able to convey message.

There being no other business, the meeting of the Inter Agency Consultation Group was adjourned.

INTER AGENCY CONSULTATION GROUP
Tuesday, May 24, 2016
East-West Gateway Board Room

Members Present:

Carol Lawrence, Chair – East-West Gateway Council of Governments
Stacy Allen - Missouri Department of Natural Resources
Mike Henderson - Missouri Department of Transportation
Betsy Tracy – Federal Highway Administration, Illinois
Heather Hamilton - U.S. Environmental Protection Agency Region 7
Chris Schmidt – Illinois Department of Transportation
Brad McMahon – Federal Highway Administration, Missouri
Buzz Asselmeier – Illinois Environmental Protection Agency (Telephone)

Others Present:

Emily Wilbur – Missouri Department of Natural Resources
Adel Alsharafi – Missouri Department of Natural Resources
Curtis Jones - Illinois Department of Transportation, Office of Planning & Programming
Kevin Jemison – Illinois Department of Transportation, District 8
Deborah Bredehoff – U.S. Environmental Protection Agency Region 7

Staff:

Mary Grace Lewandowski Lubna Shoaib Jason Lange Rodney Halbert

1. Call to Order

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

2. Update FY 2017-2020 Transportation Improvement Program and Conformity Determination
 - East-West Gateway Council of Governments

Mr. Lange, EWG, said that at the end of April the IACG was sent a list of projects which potentially could be included in the regional travel demand model. The projects were sorted by air quality classifications of Regionally Significant, Not Regionally Significant or Exempt. The IACG was asked to review and comment on the air quality classification of the projects. On May 21 a list with ten additional projects was sent out. As of today, the Illinois Department of Transportation (IDOT) has not released their program. EWG is preparing the draft Transportation Improvement Program (TIP) and draft Conformity Determination so they can be sent out in mid-June to the Executive Advisory Committee and the Board of Directors. After the June Board meeting, the draft TIP and draft Conformity Determination will be released for public comment. The comment period will run from July 1 to August 10. During July there will be a series of open houses throughout the region and a one-hour online chat (in cooperation with the

St. Louis Post-Dispatch). The final TIP and final Conformity Determination will be taken to the EWG Board for approval in August.

Ms. Shoaib, EWG, said that the regional travel demand model has been run and staff is now running the air quality analysis model. Ms. Lawrence, EWG, added that the Draft for Preview Conformity Determination document is being prepared. It will be sent to the IACG sometime in June.

Ms. Lewandowski, EWG, asked how the IDOT projects will be handled. Mr. Lange, EWG, replied that the Governor's office has to release the IDOT program before it can be made public. IDOT has provided project information which has been included in the transportation network and modeling but it cannot be listed yet. Ms. Shoaib, EWG, said that it is assumed that the IODT information received will be approved by the Governor and staff moves forward. Mr. Lange, EWG, pointed out that the draft Conformity Determination and draft TIP will only contain those projects recommended for funding.

3. Process to Develop Motor Vehicle Emission Budgets for Draft Maintenance Plan for 2008 Ozone Standard
- Stacy Allen, Missouri Department of Natural Resources

Missouri Department of Natural Resources (MoDNR) is in the middle of preparing the redesignation request and Maintenance Plan for 2008 ozone standard. MoDNR is asking the IACG for feedback on the input vehicle growth rate methodology for future year vehicle miles traveled (VMT) and vehicle population used in the development of motor vehicle emission budgets for the transportation conformity section of the plan.

The motor vehicle emission budget is to show that the St. Louis area will continue to meet air quality goal of declining emissions from the base year of 2014 out to a future year, 2030. In selecting 2030, MoDNR is assuming that it may take EPA three or four years to act on these documents and want to make sure that the Maintenance Plan covers a ten year period.

IACG consultation will be of use in the development of the 2030 budgets. MoDNR has talked with EWG and Missouri Department of Transportation (MoDOT) about VMT and VMT and vehicle population growth rates. VMT is needed for the MOVES model. MoDOT has developed an urban area (St. Louis, Kansas City with part of Columbia and Springfield) VMT growth rate for all vehicles on all road types. Growth rate changes from year to year. The 2013-2015 growth rate for all the urban road types together was 1.7 percent. When budgets were last developed, a 1.5 percent the VMT growth rate was used. Reviewed FHWA long term (1990-2014) travel monitor data and found that the growth rate was also 1.7 percent. Using 1.7 percent per year as the VMT growth rate will give a reasonable, slightly higher emissions estimate and a conservative budget. Ms. Allen, MoDNR asked if there were any comments or concerns. None were made.

EPA's method to estimate future vehicle population growth is based on future population estimates. It is the view of MoDNR that population growth is not necessarily related to the number of cars on the road. This method assumes uniform growth of cars, trucks, motorcycles and buses. MoDNR examined statewide vehicle population data by vehicle types for 2009, 2011 and 2014 from the FHWA VM-1 report. These are years with statewide emissions inventories. MoDNR asked for feedback on using a calculated 2011-2014 average annual percent change for each vehicle type to estimate future vehicle population. Based on statewide data, average annual growth rates would be: -2.9 percent growth rate for cars, 4.8 percent growth rate for trucks; and a -21.1 percent growth rate for buses. She asked if a flat growth rate or a nominal increase would be preferred.

Ms. Shoaib, EWG, pointed out that EPA requires the use of vehicle population data that is not more than five years old and that when Chicago updated their vehicle population data, they were not able to pass their Conformity budget test. So the vehicle population growth rate is a very important number. Also, the 2011-2014 negative growth rates do include the recession effect, meaning there are much older vehicles in the mix. It has been pointed out that Millennials use cars less, but when looking in terms of region or nation, they make up a very small percentage of driving public. Transit is a small percentage and trend is not large enough to justify a drop in vehicle growth. Ms. Allen, MoDNR, agreed that the growth rate for buses can remain flat for future year. Transit is a small sample size and it is better to leave growth rate flat than to go with a negative number.

Mr. McMahon, Federal Highway Administration (FHWA) MO, asked what was the cause of the decrease in transit. Ms. Allen, MoDNR, said that FHWA report showed less than 1,000 buses statewide. These were transit buses and school buses were included in the truck category. Ms. Shoaib, EWG, said that Metro is looking at bus rapid transit and the region has a good light rail system which utilizes feeder buses. The negative bus growth rate sounds suspect. Just wanted to bring this to the IACG's attention. Ms. Allen, MoDNR, pointed out that this is a statewide negative growth rate for buses. So if the IACG feels like this number is not representative of the St. Louis area, can use a flat growth rate and assume that the Metro system would continue at about the same size.

Mr. Henderson, MoDOT, asked how alternative fueled vehicles would fit into that negative growth rate. Ms. Shoaib, EWG, replied that this group would be included and taken care of in the modeling with type of fuel input. Ms. Allen, MoDNR, said that the car growth rate was also statewide and it could be reflective of less trips, consolidation of trips, or people getting away from owning multiple cars. Ms. Lewandowski, EWG, observed that an increase in seniors also could have an impact the number of cars. Ms. Shoaib, EWG, said that her concern was that this annual -2.9 percent reduction would be applied to each vehicle type and would wind up with a larger absolute reduction in number of cars. Ms. Allen, MoDNR, said that the loss of several thousand cars is more significant than five to ten buses. If the IACG is more comfortable with use of a flat or zero growth rate for cars and buses, MoDNR could move forward and not use a negative growth rate. It would produce a more reasonable number. There will still be

an increase in trucks. MoDNR staff were also concerned about a negative growth rate. A justification of this decision would be included in the Maintenance Plan documentation.

Ms. Shoab, EWG, added that it is a matter of perspective. St. Louis is not a very fast growing region, but do show slight population growth out to 2045. Even a vehicle growth rate of zero would be offset by millennials and older adults using cars less. Ms. Allen, MoDNR, said MoDNR will move forward and not use a negative growth rate for cars and buses.

Ms. Allen, MoDNR, said that another model input to discuss is vehicle age distribution or how old the vehicle fleet will be in the future. EPA uses a method based on human population growth estimates. EPA has a new optional tool which states can use to estimate future vehicle age distribution. The average age of vehicles on the road is slightly older (one to one and half years) than it was ten years ago. Unsure how representative this age distribution is when it is extrapolated out to 2030. States which have used this tool found that it shows there is a much older fleet (higher emitting). Using the output from the EPA tool caused problems for one state in meeting their transportation conformity budget. Until this tool is further investigated, MoDNR is proposing not to use it. Therefore, MoDNR is proposing to use the same vehicle age distribution method as have done in the past. The identical age distribution will be used for the 2014 base year and 2030. It is appropriate and approvable.

As no comments or concerns on these growth rates were expressed by IACG, MoDNR will start the future year modeling runs. Input tables will be sent to Ms. Shoab for review.

Motor vehicle emission budget are just one part of all the other emissions sources that have to be examined in the Maintenance Plan. The St. Louis area needs to continue a downward trend in emissions out to 2030.

It is anticipated that budget development should be completed around June 1. Budgets will be included in main document and circulated on or about June 1 for IACG consultation. Right now the formal IACG review and comment period for the SIP and motor vehicle emission budgets is scheduled for June 1 – 30. The Missouri Transportation Conformity rule states that the IACG has 30 days to review budget before MoDNR can present the document to the MACC. On June 27 the document will be posted, starting a statewide public comment period which ends August 4. A public hearing will be held at the July 28 Missouri Air Conservation Commission (MACC) meeting. The MACC will act on the redesignation request and Maintenance Plan at their August 25 meeting. They then can be submitted to EPA.

Ms. Hamilton, EPA Region 7, asked which version of MOVES is being used. Ms. Allen, MoDNR, said that they are using the latest version, MOVES2014A.

4. Federal Highway Administration Request for Comments: Proposed National Performance Measures for Assessing CMAQ Program – Traffic Congestion; and Proposed National Performance Measures for Assessing CMAQ Program – On-Road Mobile Source Emissions
- Betsy Tracy, Federal Highway Administration, Illinois

Ms. Lawrence, EWG, said that in April a Notice of Proposed Rulemaking for the third set of FHWA National Transportation Performance Management Measures was published in the Federal Register. Subparts G and H address proposed performance measures and requirements state departments of transportation (DOT) and Metropolitan Planning Organizations are to use to assess the Congestion Mitigation Air Quality (CMAQ) program. The comment period runs through August 2016. Fact sheets on these proposed subparts were distributed.

Ms. Tracy, FHWA IL, said that the proposed performance measures in Subpart G look at actual hours of excessive delay and those in Subpart H focus on total emissions reduction for each applicable pollutant. For more information on the contents of the proposed rule go to www.fhwa.dot.gov/tpm/rule. As the St. Louis region has a population of over one million, a number of performance management measure planning requirements will be triggered. As this is a bi-state area with two DOTs, may have to have a unified plan. Also, the area will have to prepare a performance plan.

Ms. Lawrence, EWG, said that the FHWA Transportation Performance Management website contained factsheets, schedule for webinars and rule-making schedule. It was good to have a brief overview because eventually, EWG, MoDOT and IDOT will be involved in this activity.

Mr. Henderson, MoDOT, said that the requirements for performance management measures came out of the Moving Ahead for Progress in the 21st Century Act (MAP-21). He has begun to develop a Subpart H tracker form based on the current CMAQ report process. Benefit emissions numbers will have to be prepared. It is his understanding that if in attainment for a pollutant, a report does not have to be prepared. Right now, looking at volatile organic compounds and oxide of nitrogen and have to develop measure for fine particle matter (PM_{2.5}). The State's performance measures probably will be the same as St. Louis'.

Mr. Schmidt, IDOT, asked if MoDOT plans to use FHWA's National Performance Management data service center or an alternative data source. Mr. Henderson, MoDOT, said that he anticipates that MoDOT would use their own databases as much as possible but someone else at MoDOT is responsible for that.

5. Other Business

There being no other business, the meeting of the Inter Agency Consultation Group was adjourned.