



## EAST-WEST GATEWAY Council of Governments

Creating Solutions Across Jurisdictional Boundaries

### AGENDA INTER AGENCY CONSULTATION GROUP TUESDAY, October 24, 2017 Noon – 1:00 P.M. East-West Gateway Board Room

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Franklin County

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Barbara Geisman  
C. William Grogan  
Richard Kellett  
John A. Laker  
Kristen Poshard

#### Non-voting Members

Erin Aleman  
Illinois Department of  
Transportation  
Erika Kennett  
Illinois Department of Commerce  
and Economic Opportunity  
Patrick McKenna  
Missouri Department of  
Transportation  
John Nations  
Bi-State Development

#### Executive Director

James M. Wild

1. Call to Order  
- Carol Lawrence, Chair, East-West Gateway Council of Governments
2. Sensitivity Analysis – Revision to Missouri's 2030 Motor Vehicle Emission Budgets for 2008 Ozone Standard  
- Stacy Allen, Missouri Department of Natural Resources  
- East-West Gateway Council of Governments
3. Other Business

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INTER AGENCY CONSULTATION GROUP  
Tuesday, September 26, 2017  
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)  
Chris Schmidt – Illinois Department of Transportation  
David Bloomberg – Illinois Environmental Protection Agency (Telephone)  
Betsy Tracy – Federal Highway Administration, Illinois

Others Present:

Kevin Jemison – Illinois Department of Transportation, OP&P  
Curtis Jones - Illinois Department of Transportation, OP&P  
Buzz Asselmier – Illinois Environmental Protection Agency (Telephone)  
Darcy Bybee – Missouri Department of Natural Resources  
Emily Wilbur – Missouri Department of Natural Resources  
Jed Wolkins - U.S. Environmental Protection Agency Region 7 (telephone)

Staff:

Mary Grace Lewandowski    Jason Lange        Lubna Shoaib        Helena Sykas

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 on Conformity Determination for FY 2018-2021 Transportation Improvement Program  
      - East-West Gateway Council of Governments

The draft Conformity Determination and draft FY 2018-2021 Transportation Improvement Program (TIP) was released for public comment at the end of June. The public comment period ran from June 30 through August 3, 2017. Five open houses took place throughout the region. An on-line chat was held in conjunction with the St. Louis Post-Dispatch. A first for EWG, there was a 30 minute Facebook Live livestream event. Approximately 186 people viewed the Facebook Live event. General view was that this was a good outreach tool.

The EWG Board approved both documents at their August 30 meeting. Both were sent to Missouri Department of Transportation (MoDOT). They were then transmitted to Federal Highway Administration (FHWA)/Federal Transit Administration (FTA) or OneDOT. OneDOT requested U.S. Environmental Protection Agency (EPA) Region 7 to

review the Conformity Determination. On September 22 EPA Region 7 sent a letter to OneDOT concurring with the findings of the Conformity Determination. EWG should receive a sign-off letter from OneDOT shortly.

3. Updating 2030 Transportation Conformity Budgets for Ozone (VOC and NO<sub>x</sub>)  
Stacy Allen, Missouri Department of Natural Resources

In September 2016, MoDNR submitted to EPA a redesignation request and a Maintenance Plan (State Implementation Plan or SIP) for the 2008 ozone standard. In April 2017 EPA found the 2030 volatile organic compounds (VOC) and oxides of nitrogen (NO<sub>x</sub>) motor vehicle emissions budgets in the maintenance plan adequate for use in Conformity Determination. During review of Maintenance Plan, EPA had some questions about the increase in total emissions from 2011 to 2014. MoDNR investigated and found that a MOVES 2014 speed distribution table for St. Louis County was the problem, leading to inflated 2014 on-road mobile source emissions. In July, corrected lower 2014 emissions were submitted to EPA. The 2030 emissions estimates did not change.

However, with the 2014 correction it is necessary to revise the 2030 budgets. First, calculate the difference between the corrected 2014 emissions estimate and the 2030 emissions estimate. The VOC and NO<sub>x</sub> budgets are the 2030 future on-road mobile source emissions projected by the MOVES model reduced by amount of banked emissions from larger point sources (with permanent and enforceable reductions in emissions which could be sold to other sources). The difference between 2014 and 2030 is considered the Safety Margin for all source types. The aim of today's discussions is to reach consensus on what these budgets should be. Table 1 contains the current 2030 budgets and revised budget. The revised 2030 budgets would be used for the 2030 analysis year and beyond.

Table 1. 2030 Budget Comparison

Pollutant	2030 Budget - Found Adequate April 2017, used in Conformity Determination (US tons per day)	Potential 2030 Budget – Suggested by MoDNR September 2017 (US tons per day)
VOC	78.49	18.42
NO <sub>x</sub>	133.65	25.57

MoDNR pointed out that if the revised budgets had been used in the Regional Emissions Analysis for the Conformity Determination for the FY 2018-2021 TIP, would have passed the tests for 2030 and the later analysis years. Emissions are decreasing over time. It is the opinion of MoDNR that the revised budgets are “doable” and can be met.

MoDNR would like to have consensus from the IACG on the revised budgets. In October, intend to complete the draft SIP revision, explaining the reasons for the changes and what the revised budgets are. Would like to share the draft with the IACG. MoDNR would then post the SIP/budget revisions for public comment. At the December 2017 Missouri Air Conservation Commission (MACC) meeting a public hearing would be held on the revisions. The MACC would adopt the revised budgets/SIP amendment at their January

or February 2018 meeting. It would be submitted to EPA Region 7. EPA has been involved in the discussions concerning revised budgets. EPA would begin an Adequacy review of the budgets which could be completed sometime in May 2018. After the budgets are found adequate, EWG would have to use them in the next Conformity Determination. It is the view of MoDNR that use of revised 2030 budgets will show that transportation program in the Missouri part of the St. Louis area will still conform to needs of air quality in future and continue to satisfy the 2008 ozone standard. MoDNR is looking for feedback.

Ms. Shoaib, EWG, observed that the 2030 VOC budget is going from 78 to 18 tons per year and the NOx budget from 133 to 25 tons per year. In this last Regional Emissions Analysis, estimated 2030 VOC emissions were close to 10 tons per year (9.68). A two percent vehicle miles traveled (VMT) growth rate had been used in past budget development efforts. Year and a half ago there was a discussion about what VMT growth rate that Missouri should use. In these discussions 2010 data was part of conversation. In 2010 VMT appeared to be flat. Since that time VMT is on the rise. If look at recent trends VMT has been increasing much faster than before which is different than historic trends. Concern is that if see this consistent higher VMT increase continue, the question will be how to deal with very narrow margin resulting from use of these 2030 budgets, particularly the 2030 analysis year in the Conformity Determination. Also, any related updated emissions inventory could be little different and MOVES is to be updated in 2020. Concern is that with all those changes that could/will happen, EWG will still have to work with these 2030 budgets in future Conformity Determinations. The St. Louis region is aggressively trying to attract more freight businesses and biomedical sector and other kinds of economic development. Hopeful that couple of things that were not present or on the horizon a couple of years ago will occur which would attract VMT. They were not apparent when Missouri developed their budgets. Pointed out that other unexpected things can happen such as business coming in, population changes and that is what the safety margin is for.

Ms. Shoaib, EWG, stated that with up to five tons from Safety Margins added to each budgets, would make the Conformity Determination process more comfortable.

Ms. Allen, MoDNR, observed that EWG's concern is about the possibility of having a VMT growth rate being greater than the 1.7 percent used to develop the 2030 budgets. When MoDNR was trying last year to identify a VMT growth rate to use, considered a short term (2-3 years) trend and found it would be over five percent for some vehicle types. Also, for some vehicle types, if VMT is averaged out over a long period of time, can wind up with negative numbers. The 1.7 percent growth rate was seen as a middle of the road solution. The intent is to have these budgets stand for many years, regardless of emission model updates and travel network changes. If budget needs to be increased, there is room in the safety margin that could be used. Percentage of safety margin used would not be as great as before, in case there is need with other emission sources.

Ms. Wilbur, MoDNR, suggested that the VMT growth be re-evaluated and re-run model and then can re-evaluate budgets. In that way can make sure that data being used to develop budget is appropriate.

Ms. Shoaib, EWG, said that EWG can do that. Pointed out that VMT is compounded over time. So, whether a 1.7 or 2.5 percent growth rate, it is less than a percent when compounded over time. EWG has the Highway Performance Monitoring System (HPMS) numbers and has just requested 2016 HPMS data. There might also be different inputs in relation to potential economic development activities. Will need to do travel demand model runs as well as MOVES runs and associated post-processing.

Ms. Allen, MoDNR, said that MoDNR will do test MOVES runs with different VMT growth rates and come up with different emissions rates. It will be like a sensitivity analysis. After this analysis would have a new table to circulate via email and then could have call-in to talk about new table and changes to model inputs.

Ms. Wilbur, MoDNR, said that from her perspective, it would be better to go through exercise and take into account the growth expect and see what emissions are. Opportunity to re-evaluate the data used. Ms. Allen, MoDNR, pointed out that the challenge is that need draft by end of October so it can be placed on public notice in November 7. There was agreement on this approach from IACG.

Ms. Shoaib, EWG, asked how the VOC budget of 18.42 came about. Ms. Allen, MoDNR, replied that it and the NO<sub>x</sub> number were the future (2030) on-road emissions projections from MOVES. The 1.7 percent VMT growth rate was used. There was no change in the 2030 emissions. The speed distribution table error only affected the 2014 emissions.

Ms. Allen, MoDNR, added that the difference in emissions from 2014 to 2030 after all emission reductions are incorporated, is the Safety Margin. Can apply some of Safety Margin to VOC and NO<sub>x</sub> budgets. In past was aggressive and assigned 80 percent to mobile source budget. This time, realized that such an assignment does not leave a lot of Safety Margin for other emission changes, if needed. As this re-analysis moves forward, maybe that lower budget number could make conformity. Additional analysis, with updated VMT and land use inputs, could provide justification that some tons would be needed. Have to consider what would be reasonable. A sensitivity analysis can't predict what the MOVES or other model changes will be.

Ms. Shoaib, EWG, pointed out that if everything goes as it does today, and to do same thing next year, would be ok. However, don't know what else will change. By doing new set of runs, can re-evaluate.

Ms. Tracy, Federal Highway Administration (FHWA) Illinois, asked if this budget revision would affect the recently approved Conformity Determination and TIP. Ms. Lawrence, EWG, said that the Missouri 2030 budget numbers used in the most recent Conformity Determination have been found adequate by EPA and still stand. These proposed budgets are not official and have not gone through EPA's Adequacy process. After the sensitivity analysis is completed, MoDNR will start the SIP revision process. When revised budgets are found adequate next year, then would have to be used in Conformity Determination.

Ms. Allen, MoDNR, said that Missouri was trying to get to place to where budget would work for everyone and to let MoDNR know if there are any big transportation projects or growth planned so can be included in analysis. Researched experiences in other areas.

Ms. Shoaib, EWG, pointed that when look at 2030 analysis year, could still pass VOC and NOx regional emissions analysis with the potential action emissions but now is opportunity to look at inputs and consider options. As to the 2014 error, MOVES files are not written in English, everything is numbers and are working with many counties and many years, things can happen. In a past Regional Emissions Analysis, EWG had to use budgets developed with Mobile6 and develop emission estimates with MOVES and it was a tight fit. It would be good to avoid something like that.

Ms. Allen, MoDNR, observed that maybe adding couple of tons to the budgets makes sense.

Mr. Henderson, Missouri Department of Transportation (MoDOT), asked if there will be opportunity to revisit these budgets in future. Ms. Allen, MoDNR, said that correcting the budgets as result of emission error, does not preclude revisiting in future as result of MVOES change or when 2015 standard implemented. This is not the last time will be talking about budgets.

Ms. Tracy, FHWA Illinois, recommended adding discussion about budgets in Conformity Determination documentation. Ms. Lawrence, EWG, said that the changes can be addressed in the documentation for next year's Conformity Determination.

Consensus from IACG that MoDNR and EWG proceed with approach. It can be discussed at October IACG. Ms. Allen, MoDNR, stated that she will need to have SIP revision document ready to go. Information can be circulated via email for review.

#### 4. Other Business

EPA Region 7 has sent the 2008 and 2025 PM<sub>2.5</sub> budgets from the 2014 supplement/revision to the redesignation request and maintenance plan for Missouri portion of St. Louis non-attainment area for the 1997 PM<sub>2.5</sub> standard to EPA Office of Transportation and Air Quality (OTAQ) to be posted on the Adequacy web site and start the Adequacy review process. Budgets found adequate can be used in Conformity Determination before a SIP is approved by EPA.

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