1. Call to Order

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

2. Fine Particulate (PM$_{2.5}$) Hot-Spot Analysis to be included in the Environmental Assessment Document for I-270 North Project

- Mike Henderson, Missouri Department of Transportation

The Federal Highway Administration (FHWA) has recommended that when Missouri Department of Transportation (MoDOT) put hot-spot evaluation (need to do analysis or not) into environmental documents, MoDOT “vet” them through the IACG to make sure that everything has been done as it is supposed to be. Mr. Henderson reviewed the analysis prepared by the I-270 project consultants and his determination was that a Hot-Spot Analysis would not be required for any projects within the I-270 North Project study area. He wanted to show this analysis to the IACG and see if they were in agreement with his determination. There were a couple of values were slightly above the arbitrarily set criteria levels in the IACG guidance document that could indicate if a hot-spot analysis was needed. In general, these values do not reach the point of requiring a Hot-Spot Analysis be performed. Although some of the values were close to the arbitrarily-set levels, this project would not be adding any new traffic. The threshold is 125,000 vehicles and eight percent diesel truck traffic.
Mr. McMahon, FHWA MO, said that a clarification was needed and information was vetted. The expectation is that the group will take a positive action and MoDOT can move forward. It was his view that when a decision about need for Hot-Spot Analysis for a particular project is made as part of National Environmental Policy Act (NEPA) determination, this decision would always be vetted through the IACG. He would like to see all analyses come through this group. State DOT Environmental section is now aware of considerations/criteria for project level conformity and Hot-Spot Analysis that has been established and should be looking to IACG for their concurrence. Not just because a couple of numbers are touching threshold. Mr. Henderson would serve as conduit to this group. The IACG’s effort has facilitated and enhanced linking planning and environment and helping to change the culture within Environmental Program at MoDOT.

Mr. Coulson, EWG, asked who would be the contact for Illinois. Mr. Schmidt, Illinois Department of Transportation (IDOT) said that he is the Central Office Air Quality Manager but there would need to be internal discussion with the Local Roads section. He is the Central Office Air Quality Manager and would be fine with being a part of this but discussions are needed. He added that for Chicago area have a Tier 2 Consultation Group which does a similar effort for projects of air quality concern. General consensus among group. The Chicago Metropolitan Agency for Planning (CMAP) staff tends to get U.S. Environmental Protection Agency (EPA) in on these conversations and get their regional perspective. Mr. McMahon, FHWA, pointed out that as EPA is part of IACG, they are involved in the discussion.

Mr. Rogers, Illinois Environmental Protection Agency (Illinois EPA), expressed concern about such an action suggested by Mr. McMahon. The IACG adopted criteria (125,000 vehicles, eight percent diesel trucks) was based on EPA and FHWA recommendation. Granted the consultant should do this type of analysis. If that analysis shows that numbers are sufficiently below established thresholds, do not know if it would warrant MoDOT or IDOT to come to IACG with every project that falls below these thresholds. When project is at or above threshold, some consultation with IACG could be needed.

Mr. Henderson, MoDOT, agreed and suggested that rather than run every project through the IACG, do it only those times when have questions about where these numbers fall. If numbers are well below, why couldn’t MoDOT and FHWA and anyone else who has to sign-off on the study agree that it (analysis of need for Hot-Spot Analysis) does not have to go through the IACG. MoDOT environmental know expected threshold because of the IACG’s effort, make call and run the analysis and resulting decision by Mr. Henderson.

Mr. Coulson, EWG, pointed out that this was ultimately the responsibility of MoDOT and IDOT. Mr. Henderson, MoDOT, said that Federal Highway has the opportunity to review documentation before they sign-off on the Record of Decision and they could ask for item to be reviewed by IACG before sign-off.

Mr. Coulson, EWG, asked if concurrence on the decision for the I-270 North Project was needed. Mr. Schmidt, IDOT, made a motion that group finds this project not to be a project of air quality concern requiring a hot spot analysis. Motion was seconded by Mr.
McMahon, FHWA MO. In the discussion about this motion, Mr. Winkelmann, Missouri Department of Natural Resources (MoDNR), said that he had talked with Mr. Henderson. The key item would be the number of diesel trucks/diesel truck traffic as they contribute to PM$_{2.5}$. Truck traffic is not going to be 10 percent of vehicles and is estimated to increase less than one percent. The project is not going encourage an increase in the number of trucks stopping in area any more than number of trucks traveling through the area. Mr. McMahon, FHWA MO, suggested that Mr. Henderson provide MoDOT environmental with IACG notes. Motion stands as duly entered.

Mr. Henderson, MoDOT, said that he had submitted this Hot-Spot Analysis policy process for the internal MoDOT Innovation Challenge and had won the first round. If process moves past the second round, it will be part of the state-wide showcase. Mr. Henderson was given a round of applause.

3. Conformity Determinations Occurring in 2015
   - East-West Gateway Council of Governments

   A. Status Report - Mid-Year Conformity Determination for Amendment to FY 2015-2018 Transportation Improvement Program and Related Amendments to Regional Transportation Plan 2040 (Board action January 2015)

   B. Conformity Determination for Connected 2045: Long Range Transportation Plan (Board action June 2015)

   C. Conformity Determination for FY 2016-2019 Transportation Improvement Program and Related Amendments to Connected 2045 (Board action July 2015)

Mr. Coulson, EWG, said that EWG staff is currently wrapping up the Mid Year Conformity Determination for the Amendment to the FY 2015-2018 Transportation Improvement Program (TIP) and related amendments to the Regional Transportation Plan 2040. Conformity Determination and the Amendment to the FY 2015-2018 TIP are to be approved by the EWG Board of Directors on January 28. Mr. McMahon, FHWA MO, asked when the Conformity Determination and Mid Year Amendment to FY 2015-2018 TIP would be submitted to MoDOT. Mr. Lange, EWG, said that after the Board acts on Wednesday, the documents will be transmitted without delay and EPA Region 7 could see it in early February. There was a brief discussion on state and federal FHWA level logistics.

After that, EWG staff will be preparing a Conformity Determination for Connected 2045: Long Range Transportation Plan for the St. Louis Region (Connected 2045) and a Conformity Determination for the for FY 2016-2019 TIP. Staff is in agreement with proceeding with two Conformity Determinations, even though there will probably not be any difference between the outcomes. From a legal standpoint this makes it a cleaner process for EWG. Connected 2045 has to be approved by the EWG Board of Directors by June 30, 2015. The FY 2016-2019 TIP will go before the Board in July 2015. An approved plan is needed for this TIP to be
amended into. EPA has 30 days to review Conformity finding before OneDOT approves plan.

Mr. Henderson and Mr. McMahon both pointed out that OneDOT does not approve the transportation plan, OneDOT concurs with findings and accepts it.

Mr. Coulson, EWG, asked for comments from the group. Mr. Henderson, MoDOT, said that Jerry Blair, Director of Transportation, told him that EWG would not necessarily have TIP projects information when conformity for Connected 2045 is conducted and might have new projects for the TIP. Dealing with an extra month. Mr. Lange, EWG, said that the draft Conformity Determination and draft Connected 2045 will be released for public comment at the end of March 2015. The comment period will be 60 days. For the FY 2016-2019 TIP, anticipated that information on MoDOT, IDOT or Metro projects will not be available until the end of April. The TIP is to be amended into Connected 2045. Mr. Henderson, MoDOT, asked if there needs to be a Conformity Determination at the March release of Connected 2045. Mr. Coulson, EWG, said yes. He added that a motion is needed that today be the start date for the Conformity Determination process.

Mr. Henderson, MoDOT, made a motion that the IACG identify January 28, 2014 as the date that the Conformity Determination for Connected 2045 begins. Mr. McMahon, FHWA MO, seconded the motion. The motion carried.

Ms. Allen, MoDNR, said that in December 2014 there was a Court decision regarding transportation conformity requirements for the 1997 ozone standard. In 2012 when the non-attainment designations for the 2008 standard were finalized, EPA also decided to revoke the transportation conformity requirements for the 1997 standard. EPA was sued and the Court found in favor of the litigants that EPA can not remove conformity requirements by themselves. EPA has begun the process to revoke the entire 1997 standard and should be completed this spring. This delay should not have an impact on any St. Louis conformity determination activities. MoDNR and EPA Region 7 are working to redesignate the St. Louis area as in attainment of the 1997 standard before EPA revokes this standard.

Mr. Winkelmann, MoDNR, added that in the Early Progress Plan, 2015 motor vehicle emission budgets were established for the 2008 standard. These budgets were found adequate by EPA. Missouri has submitted a redesignation request for the 1997 standard. The Maintenance Plan for the 1997 standard contains 2025 budgets. In the development of the Maintenance Plan, did not think 2008 budgets were needed. Then this court ruling was issued. If look at budgets from Early Progress Plan, they still demonstrate maintenance of the 1997 standard.

Ms. Lawrence, EWG, presented the regional emissions analysis tables to be used in the Conformity Determination for Connected 2045 and FY 2016-2019 TIP. The analysis years for ozone and PM2.5 will be 2015, 2025, 2035 and 2045. For ozone will be using action/budget tests for Missouri and Illinois. For PM2.5 will be using the action/2002 baseline inventory test for the non-attainment area. Ms. Allen, MoDNR, indicated that the approval by EPA of Missouri’s PM2.5 SIP for the 1997 standard is still pending.
Mr. Schmidt, IDOT, made a motion that the IACG identify January 28, 2014 as the date that the Conformity Determination for the FY 2016-2019 TIP and related amendments to Connected 2045 begins. Mr. McMahon, FHWA MO, seconded the motion. The motion carried.

4. Other Business

The group discussed the process of bringing conformity requirements to an end in maintenance areas which are reaching the end of their second 10-year maintenance period. Ms. Allen, MoDNR, pointed out that the first ten-year period for the 1997 ozone standard is just starting for the Missouri counties. The group also discussed the air quality status of the Kansas City area and EPA maps showing non-attainment and maintenance areas in the U.S.

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