



EAST-WEST GATEWAY
Council of Governments

Creating Solutions Across Jurisdictional Boundaries

AGENDA
INTER AGENCY CONSULTATION GROUP
TUESDAY, March 27, 2018
Noon – 1:00 P.M.
East-West Gateway Board Room

Chair

Steve Stenger
County Executive
St. Louis County

Vice Chair

Mark A. Kern
Chairman, St. Clair County Board

2nd Vice Chair

Robert Elmore
Chairman, Board of Commissioners
Monroe County

Executive Committee

Steve Ehlmann
County Executive
St. Charles County
John Griesheimer
Presiding Commissioner
Franklin County
Lyda Krewson
Mayor, City of St. Louis
Kurt Prenzler
Chairman, Madison County Board
Ken Waller
County Executive
Jefferson County

Members

Chuck Caverly
St. Louis County Municipal League
Emeka Jackson-Hicks
Mayor, City of East St. Louis
Carol Johnson
Franklin County
Reggie Jones
St. Louis County
Mark Kupsky
Vice President,
Southwestern Illinois
Council of Mayors
Roy Mosley
St. Clair County
Lewis Reed
President, Board of Aldermen
City of St. Louis
Herbert Simmons
President, Southwestern Illinois
Metropolitan & Regional
Planning Commission
Tom Smith
President, Southwestern Illinois
Council of Mayors
Michael Walters
Madison County
John White
St. Charles County
Regional Citizens
Barbara Geisman
C. William Grogan
Richard Kellett
John A. Laker

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. **Conformity Determination for the FY 2019-2022 Transportation Improvement Program and Related Amendments to Connected2045**
 - Schedule for Conformity Determination
 - Regional Emissions Analysis Tests, Analysis Years and Budgets
 - Date Conformity Determination Begins
- East-West Gateway Council of Governments
3. **Draft Missouri Performance Management Measure to Assess CMAQ Program – On-Road Mobile Source Emissions**
 - Setting Targets for VOC, NO_x and PM_{2.5}
 - Addressing CO
- East-West Gateway Council of Governments
- Missouri Department of Transportation
4. **February 16, 2018 Decision by U.S. Court of Appeals for the District of Columbia in case of South Coast Air Quality Management District v. EPA**
- U.S. Environmental Protection Agency
5. **Other Business**

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INTER AGENCY CONSULTATION GROUP
Tuesday, January 30, 2018
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
Buzz Asselmeier – Illinois Environmental Protection Agency (Telephone)

Others Present:

Curtis Jones - Illinois Department of Transportation, OP&P
Lachala Kemp – U.S. Environmental Protection Agency Region 7 (Telephone)
Kevin Jemison – Illinois Department of Transportation

Staff:

Mary Grace Lewandowski Rachel Pawlek Jason Lange Peter Koepfel
Josh Schwenk

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 Missouri 2030 Motor Vehicle Emission Budgets
 - Stacy Allen, Missouri Department of Natural Resources

During the U.S. Environmental Protection Agency's (EPA) review of the Redesignation Request and Maintenance Plan for the 2008 Ozone Standard for Missouri portion of St. Louis non-attainment area last year, several technical questions were raised. Missouri Department of Natural Resources (MoDNR) investigated and found that the 2014 emission inventory had an error which required that the 2030 motor vehicle emissions budgets (MVEBs) for volatile organic compounds (VOC) and oxides of nitrogen (NO_x) in the Maintenance Plan be re-visited. Last summer MoDNR worked on a technical correction which included revisions to 2014 emission inventory and the 2030 MVEBs. In setting a revised 2030 MVEBs, MoDNR received input from the IACG and Ms. Shoab of EWG. Needed to be able to identify how much of the safety margin would be used and is it reasonable.

At their December 7, 2017 meeting the Missouri Air Conservation Commission (MACC) held a public hearing on the technical correction. The MACC is to adopt the technical correction at their February 1, 2018 meeting. After it is adopted, the technical correction and revised 2030 MVEBs will be submitted to EPA for review. Before these MVEBs can be used in a Conformity Determination, either EPA can perform an Adequacy

determination separately or may choose to go ahead and approve redesignation request and Maintenance Plan.

Ms. Lawrence, EWG, said that in December 2017 EPA found adequate for use in Conformity Determination the 2030 MVEBs prepared by Illinois Environmental Protection Agency (Illinois EPA) for their redesignation request and Maintenance Plan for the 2008 Ozone Standard for Illinois portion of non-attainment area. Mr. Asselmeier, Illinois EPA, confirmed this action.

3. Timing of Transportation Improvement Program and Conformity Determination - East-West Gateway Council of Governments

The development of the Transportation Improvement Program (TIP) schedule has been delayed because staff is concluding an update of the Surface Transportation Block Grant Program (STP) scoring criteria for projects from local sponsors. The EWG Board is to adopt it at the January 31 Board meeting. The scoring criteria needs to be finalized before preparing the TIP and Conformity Determination schedule. Transportation staff are considering different options and consulting with the state Department of Transportations. It is anticipated that the TIP development process and schedule will be moved back a couple of months which means that the Conformity Determination will not be following its usual schedule. Local Project and Congestion Mitigation Air Quality (CMAQ) proposals could be due in June with local program recommendations from Missouri and Illinois Transportation Planning Committees coming in early August. Draft TIP would be presented to the Board at their August meeting and would then go out for public comment. The Board would act on the TIP at their October meeting. By the March IACG meeting should have a better idea about the TIP development specifics and the Conformity Determination process. At that time IACG can also reach consensus on the date that the Conformity Determination is considered to begin.

It was suggested that language describing the requirement concerning the frequency of a conformity determination be added to the Conformity document.

Ms. Allen, MoDNR, said that she will be revisiting planning assumptions and re-evaluating MOVES2014a inputs and growth factors. Anticipate this effort could begin in June. She will be communicating with Ms. Shoaib about this.

4. Regional Emissions Analysis Tests, Analysis Years and Budgets - East-West Gateway Council of Governments

Ms. Lawrence, EWG, presented the draft Regional Emissions Analysis tests, analysis years, budgets and baseline emission inventory to be used in the Conformity Determination for the upcoming TIP. A draft was sent out with the Agenda. For ozone will use the action/budget tests. For Missouri, the 2015 MVEBs from the Missouri Early Progress Plan for the 2008 ozone standard will be used for 2020 and 2025. For right now, the 2030 MVEBs (found adequate in 2017) and the proposed revised 2030 MVEBs are included in the table. The 2030 MVEBs (adequate in 2017) from the Regional Emissions

Analysis will be removed from the Regional Emissions Analysis table once EPA finds adequate the revised 2030 MVEBs for use in Conformity and/or approves Maintenance Plan for the 2008 ozone standard. The 2030 MVEBs will be used for the 2030, 2035 and 2045 analysis years.

For Illinois, the 2008 MVEBs from the Maintenance Plan for 1997 ozone standard will be used for the 2020 analysis year. The 2025 MVEBs from the Illinois Maintenance Plan for 1997 ozone standard will be used for the 2025 analysis year. In December 2017, EPA found adequate the 2030 MVEBs from the Maintenance Plan for the 2008 ozone standard. These MVEBs are to be used for the 2030, 2035 and 2045 analysis years

EWG will be conducting conformity for the 1997 PM_{2.5} standard and following the interim requirements. The action/2002 baseline inventory test for direct PM_{2.5} and NO_x, as a precursor, will be performed for the entire non-attainment area (MO-IL) for 2020, 2025, 2030, 2035 and 2045 analysis years.

Ms. Hamilton, EPA Region 7, said that it was her understanding that the redesignation to attainment of the 2008 standard for the Missouri portion of the non-attainment area was ready and just waiting for the revised 2030 budgets to be found adequate. When that occurs, one decision could be issued. She asked about the correspondence schedule for the upcoming Conformity Determination. Ms. Lawrence, EWG, said that in March should have a better idea about the timing.

Ms. Allen, MoDNR, said that in the January 5, 2018 Federal Register, EPA issued an Advance Notice of Proposed Rulemaking for Missouri's redesignation to attainment request and Maintenance Plan, including MVEBs, for 1997 annual PM_{2.5} standard. Based on their analysis, EPA would like to move forward. Missouri is to submit 2015-2017 monitoring data. At some time Missouri portion of PM_{2.5} non-attainment area could be redesignated to attainment for 1997 standard. If that occurs, Conformity Determination for the 1997 standard could fall away as there is a newer (2012), more proscriptive standard is in place. It is possible that for the Missouri side the transportation conformity requirements could go away as 2015-2017 monitoring data shows that the Missouri side is in attainment of the 2012 annual PM_{2.5} standard.

5. Draft Missouri Performance Management Measure to Assess CMAQ Program – On-Road Mobile Source Emissions
 - Mike Henderson, Missouri Department of Transportation
 - Peter Koeppel, East-West Gateway Council of Governments
 - Jason Lange, East-West Gateway Council of Governments

Mr. Henderson, Missouri Department of Transportation (MoDOT), said that in 2016 MoDOT began to work on this performance measure. In the Federal Highway Administration (FHWA) guidance, CO shows up as a required metric for St. Louis along with ozone (VOC and NO_x) and PM_{2.5}. St. Louis has a CO limited maintenance area consisting of the City of St. Louis and that portion of St. Louis County within I-270. EWG has assembled emission data from last four years (2016-2019) of CMAQ projects for VOC

and NO_x and PM_{2.5} but not CO. If have to move forward and include CO in this performance measure, it could take some time for EWG modelers to prepare. EWG has not had to consider CO in Congestion Mitigation Air Quality (CMAQ) project evaluation. When this was first talked about, thought there was agreement from MO and IL FHWA that since not done analysis for CO, could exclude that pollutant from performance measure requirement. Suggested getting all of the federal partners to agree that they treat it (the inclusion of CO in this performance measure) like a categorical exclusion.

Ms. Hamilton, U.S. Environmental Protection Agency (EPA) Region 7, asked if St. Louis is in its second CO maintenance plan. Ms. Allen, MoDNR, said that the St. Louis area attained the standard in 1997. MoDNR prepared a maintenance plan for first ten years. It is near the end of the time period for its second maintenance plan. In April 2014 MoDNR submitted a second CO maintenance plan to EPA which was approved by them in May 2015. The Executive Summary of the 2014 CO Maintenance Plan states that this second maintenance plan provides for the continued attainment of the CO National Ambient Air Quality Standard (NAAQS) for St. Louis area, Missouri side, going through the end of 2018. There is no requirement to keep going at its conclusion. As far as MoDNR is concerned, have shown that the CO standard has been maintained for 20 year period and are done with obligations there. Unsure what something official stating that obligations for this pollutant are ended for this area would look like or how it would occur.

Ms. Hamilton, EPA Region 7, reported that EPA's May 2015 Federal Register notice approving the second maintenance plan states that St. Louis will maintain the CO standard through the year 2022. She added that after complete the second period of a maintenance plan, there is not a lot of good guidance. Can research actions and get back.

Mr. Henderson, MoDOT, said that he would like to have consensus that there is no need to go back and assemble CO data for this performance measure. Perhaps could put together some form of resolution describing how it would be counter-intuitive to have CO as metric. Aware that since end of 2018 will be end of second maintenance plan, inclusion of CO is not needed.

Mr. Henderson, MoDOT, said that Missouri has to set targets for these pollutants. MoDOT is working with EWG. First, assemble baseline emissions associated with CMAQ projects and then set targets for each pollutant. At this time, there is no guidance on how to set targets. Further guidance will come out from FHWA. They expect states to prepare targets and if FHWA sees a best practice, will inform everyone. Emission targets (kilograms/day) are to be submitted to FHWA by May 2018 with first analysis due in October 2018 (baseline). Interim official report is due in 2020 and at that time can change targets. Final report is due in 2022. There is no ramification if target is not made. He met with MODOT senior management about the Phase 3 set of Performance Management Measures, including this one. It was their suggestion to set the targets low, as have an opportunity to revise them in 2020. With historical data collected, could use the year with lowest emissions. Looking for agreement from IACG concerning targets.

Mr. Lange EWG, said that EWG prepared mock-up showing data from past 4 years of CMAQ projects (2016-2019). Line graphs were used to show how the baseline data

looks. From that could consider targets and how will measure progress. He added that the farthest go out is 2020. For this measure, emission benefits are assumed to come from the first year a project is obligated. (Obligated – federal funds were authorized and committed by the state or designated recipient, and authorized by FHWA or awarded as a grant by FTA.) Mr. Henderson, MoDOT, added that it depends on what year a project was obligated. Want to make sure not double counting emissions.

Discussion about processes EWG and Illinois Department of Transportation (IDOT) use to calculate emission benefits for CMAQ projects and how to insure not double counting projects. Mr. Lange, EWG, said that estimates of emissions are calculated separately for Illinois and Missouri. Mr. Schmitt, IDOT, also works with Chicago Metropolitan Agency for Planning (CMAP) on this performance measure. They are looking for best practices for setting targets. IDOT has encouraged CMAP to set low targets. Want to be consistent with MoDOT.

Mr. Koepfel, EWG, observed that target setting is not an exact science and that is why they are to be re-visited in two years and re-adjusted, if needed. Mr. Henderson, MoDOT, said that one possibility was to look at the historical data and use the year with the lowest emissions as the target, knowing that it can be adjusted.

For the March IACG meeting –

Ms. Allen and Ms. Hamilton will provide link to CO Maintenance Plan and Federal Register document number. They will be distributed to the IACG. They will do further research on difference between Executive Summary and Federal Register notice.

IACG participants are to consider CO approach and potential emission targets and be ready to discuss.

6. Other Business

Mr. Asselmeier, Illinois EPA, said that he is currently working on the MVEBs for the PM2.5 redesignation request and Maintenance Plan for the 1997 annual PM2.5 standard. He will be sending MVEBs table and input files to EWG for review.

The next meeting of the IACG will be on Tuesday, March 27, 2018.

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