AGENDA
INTER AGENCY CONSULTATION GROUP
Tuesday, August 25, 2020
2:00 pm – 3:00 pm
Virtual Meeting

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1. Call to Order
- Carol Lawrence, East-West Gateway Council of Governments

2. Update on FY 2021 – 2024 Transportation Improvement Program and Conformity Determination
- East-West Gateway Council of Governments

3. IDOT Program Release and Next Steps
   • Amendment to FY 2021 – 2024 TIP
   • Mid-Year Conformity Determination
     o Reliance on Use of Previous Regional Emissions Analysis
     o Date Conformity Determination Began
- East-West Gateway Council of Governments

4. Other Business

5. Adjournment
Members Present:
Carol Lawrence, Chair - East-West Gateway Council of Governments
Buzz Asselmeier – Illinois Environmental Protection Agency
Betsy Tracy – Federal Highway Administration - Illinois
Kevin Jemison – Illinois Department of Transportation
Mike Henderson - Missouri Department of Transportation
Mark Leath – Missouri Department of Natural Resources
Jed Wolkins – U.S. Environmental Protection Agency Region 7
Tom Caldwell – Illinois Department of Transportation

Others:
Francisco Cortalezzi – Missouri Department of Natural Resources

Staff:
Mary Grace Lewandowski  Jason Lange  Jennifer Vuitel  Rachael Pawlak  Josh Schwenk  Maureen McCarthy

1. **Call to Order**
   - Carol Lawrence, Chair, East-West Gateway Council of Governments

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 FY 2021-2024 Transportation Improvement Program and Conformity Determination**
   - East-West Gateway Council of Governments

The draft FY 2021 – 2024 Transportation Improvement Program (TIP) and draft Conformity Determination will be presented to the EW Board of Directors on June 24. The program for the Illinois Department of Transportation (IDOT) has not been released by the Governor. Once the IDOT program is released, it probably will be presented in a separate document. The TIP will be available for public comment from June 30 – August 5, 2020. Two virtual public open houses are scheduled for Tuesday, July 14 from noon – 12:30 pm and Thursday, July 23 from 5:00 – 5:30 pm. Information about the open houses and how to register for them will be posted on the East-West Gateway website.

A requirement for transportation projects submitted to the TIP is their adherence to air quality conformity. All projects must be analyzed to determine conformity with state air quality plans prepared for ozone standards. Projects that are not included in the air quality analysis cannot progress toward implementation.
Ground level ozone is the main pollutant of concern for the East-West Gateway region. In 2018 the Environmental Protection Agency (EPA) designated St. Charles County, St. Louis County, St. Louis City, Boles Township in Franklin County, Madison County, and St. Clair County as non-attainment for the 2015 ozone standard. As a result it is required that air quality conformity determination must be performed for that standard in those areas. The EPA has redesignated the eight-county St. Louis region (MO-IL) as being in attainment of the 2008 ozone standard. The region is considered a maintenance area, however EPA has not revoked the standard so air quality conformity determination must be performed for the 2008 standard.

Projects included in the TIP must pass regional emissions analysis tests for VOC and NO\(_x\) for a series of analysis years out to 2045 (the horizon year for the *Connected2045 Update*). Federal and state regulations require that for each analysis year, emissions of VOC and NO\(_x\) resulting from the implementation of the TIP will be less than or equal to the motor vehicle emissions budgets established by Missouri and Illinois.

All air quality conformity regional emissions analysis tests were passed for all four analysis years for the 2008 ozone standard. All regional emissions analysis tests for the 2015 standard also passed for all five analysis years. The 2015 ozone standard has one additional analysis year because 2020 is considered to be the attainment year for the 2015 standard.

Conformity for the 1997 ozone standard is to be considered but only if there is a Regionally Significant Project in Jersey County, IL. For this conformity determination there are not any new Regionally Significant Projects in Jersey County. In January 2020 conformity with the 1997 eight-hour ozone standard was demonstrated for Illinois Department of Transportation’s (IDOT) U.S. Route 67 Delhi Bypass project.

The TIP will be released for public comment from June 30 – August 5, 2020. There are two virtual public open houses scheduled: Tuesday, July 14 from noon – 12:30 pm and Thursday, July 23 from 5:00 – 5:30 pm. Information about the open houses and how to join them will be posted on the East-West Gateway website. Comments or questions must be received or postmarked by 5:00 pm, Thursday, August 5, 2020. Send them to TIP@ewgateway.org or East-West Gateway Council of Governments, Attn: TIP, One Memorial Drive, Suite 1600, St. Louis, MO 63102

The final documents will be presented to the Board of Directors on August 26, 2020. IDOT has not yet released their list of projects so it will be submitted separately for approval in the future. Once the Governor of Illinois releases the list of projects it will be made available for public comment. More information about the TIP and conformity determination can be found on the East-West Gateway website at www.ewgateway.org
3. **Other Business**

Mr. Henderson, Missouri Department of Transportation (MoDOT), asked if there are going to be any new proposed SO\textsubscript{2} non-attainment areas in southeast Missouri and would it affect the port there. Mr. Leath, Missouri Department of Natural Resources (MoDNR) stated that a new SO\textsubscript{2} non-attainment area has been recommended for a portion of New Madrid County with the recommended boundary to include the New Madrid power plant and the neighboring Magnitude 7 Metals aluminum smelter. The U.S. Environmental Protection Agency (EPA) will make the final designation. Mr. Leath will talk with Mr. Henderson after the meeting.

Mr. Leath from MoDNR, said that he will be the MoDNR conformity contact for now.

At the request of IDOT, the May minutes will be revised to state that IDOT does not have any new regionally significant projects in Jersey County.

4. **Adjournment**

The next meeting of the IACG will be on August 25, 2020. There being no other business, the meeting of the Inter Agency Consultation Group was adjourned.
Release of the IDOT Program and Next Steps for East-West Gateway

Background
On July 21, 2020 the Illinois Department of Transportation (IDOT) program was officially released by Governor Pritzker. There are 91 projects proposed in Madison, Monroe and St. Clair Counties. See attached pdf.

IDOT provided information about these projects to East-West Gateway (EWG) in April 2020. These projects were included in the regional emissions analysis run in April - June 2020 for the Conformity Determination for the FY 2021-2024 Transportation Improvement Program (TIP). The IDOT program is typically released by the Governor of Illinois in May. This year, the Governor did not release the IDOT program until July. Because the IDOT program was not released prior to EWG’s June 30 release of the Draft Conformity Determination and Draft FY 2021-2024 TIP for public comment, these IDOT projects are not listed in Appendix A of the Conformity Determination document.

Of the 91 IDOT projects, 69 were included in the Conformity Determination for the FY 2020-2023 TIP and include six regionally significant projects. There are 22 projects which are new to the FY 2021-2024 program and are highlighted in yellow in the attachment. The majority are classified as exempt but there is one regionally significant project (7100N-21) for phase II engineering only, for a lane addition to I-270. Note, there are no construction funds programmed in the TIP for this project. Phase II engineering is the development of the final plans. Phase II engineering takes place after NEPA in Illinois. Construction for this project is included in the Long Range Transportation Plan. This project was included in the regional emissions analysis for the Conformity Determination for the FY 2021-2024 TIP and the Conformity Determination for the FY 2020-2023 TIP.

Next Steps
EWG staff are proposing to do a Mid-Year Conformity Determination and amend the FY 2021-2024 TIP to include the July 2020 IDOT program. The EWG Board of Directors would act on them at their January 2021 meeting.

For the regional emissions analysis portion of the Mid-Year Conformity Determination, EWG plans to rely on the previous regional emissions analysis per 40 CFR §93.122(g) to demonstrate conformity for the January 2021 amendment. To be able to do so:

- Information about the IDOT projects were part of the previous regional emissions analysis done as part of the Conformity Determination for the FY 2021-2024 TIP.
- There have been no significant changes in the design scope and or concept for regionally significant projects.
- No additional years are being added to the TIP.
- The previous 20-year analysis, Conformity Determination for Update to Connected2045, was completed in 2019 so it is no more than four years old. The most recent Conformity Determination performed by EWG will be acted upon by the EWG Board of Directors at their August 26, 2020 meeting.
Earlier this month, EWG talked with EPA Region 7 about this approach. After internal EPA discussion, reliance on a previous regional emissions analysis can be the path forward for the Mid-Year Conformity Determination. The change of status for project 7100N-21 for phase II engineering only, would not trigger a Regional Emissions Analysis.

Since beginning of June there have been no changes to the planning assumptions which are used in the regional emissions analysis and no new MOVES model. These items are discussed in Appendices B, C or D of the Conformity Determination document). (40 CFR §93.110 and 111)

Looking for Consensus from IACG
The reliance on a previous analysis would need to be agreed to by the Inter Agency Consultation Group (IACG) as well as other specifics concerning the Mid-Year Conformity Determination.