



U.S. Department
of Transportation

**Federal Highway
Administration**

*Federal Highway
Administration*

**Federal Transit
Administration**

Transportation Management Area Planning Certification Review

St. Louis Transportation Management Area



April 12, 2021

Summary Report

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1.0 EXECUTIVE SUMMARY

On January 21-29, 2021, the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) conducted the risk-based certification review of the transportation planning process for the St. Louis urbanized area. FHWA and FTA are required to jointly review and evaluate the transportation planning process for each urbanized area over 200,000 in population at least every four years to determine if the process meets the Federal planning requirements.

The East West Gateway Council of Governments (EWGCOG) is the designated Metropolitan Planning Organization for the St. Louis region and works with the Missouri Department of Transportation (MoDOT) and Illinois Department of Transportation (IDOT) as well as the region's public transit operators to implement the federally required planning process.

The scope of the federal certification review of the St. Louis metropolitan planning process was comprehensive, covering the transportation planning process for the entire area and all the agencies involved. The federal review team's work consisted of reviewing the products of the planning process, reviewing the ongoing oversight activities conducted by the FHWA and the FTA, and three virtual on-site meetings conducted January 21-29, 2021 with EWGCOG, Local Transit Operators, Missouri Department of Transportation (MoDOT) and Illinois Department of Transportation (IDOT) staff members. In addition to assessing the progress in addressing recommendations from the last certification review in 2017, the virtual on-site review focused on compliance with current transportation law, planning regulations, current issues, best practices, and opportunities to enhance the planning process.

This final report summarizes the current status of planning areas, provides an overview of review findings and highlights noteworthy practices at EWGCOG. Additionally, a number of recommendations have been made for the EWGCOG to improve the current transportation planning process. A detailed summary of commendations and recommendations is covered in the Process Review Findings section of the report.

Based on this review and ongoing oversight by the Federal Highway Administration and the Federal Transit Administration, the transportation planning process carried out in the St Louis, Missouri Transportation Management Area for the period April 12, 2021 to April 11, 2025 is certified as meeting the requirements as described in 23 CFR Part 450 and 49 CFR Part 613.

1.1 Disposition of FY 2017 Certification Review Recommendations

The 2017 Federal Certification Review Final Report dated April 14, 2017 presented 19 recommendations for the EWGCOG, MoDOT, IDOT, and local transit operators to improve

the transportation planning process. The implementation status of each recommendation is presented in a disposition summary table that can be viewed in Appendix B.

1.2 Summary of FY 2021 Findings

The FY 2021 Federal Certification Review found that the metropolitan transportation planning process conducted in the St. Louis urbanized area meets Federal planning requirements. As a result of this review, FHWA and FTA are certifying the transportation planning process conducted by Missouri/Illinois Department of Transportation (MoDOT, IDOT), East-West Council of Governments Metropolitan Planning Organization (EWGCOG) and Bi-State- Metro, Madison County Transit, St. Clair County Transit District, and Loop Trolley (public transit providers). This report will address recommendations that warrant consideration, as well as commendations in areas that EWGCOG is highly performing

Key Definitions:

Corrective Actions: Those items are compliance issues that fail to meet one or more requirements of the federal planning statute and regulations.

Recommendations: Items that address technical improvements to processes or procedures, that are not regulatory, but are still significant enough that FHWA and FTA encourage taking some action. Typically, the recommendations involve the state of the practice instead of federal regulatory requirements.

Commendations - Noteworthy Practices: Elements that demonstrate innovative, highly effective, and well thought out procedures for implementing the planning requirements. Elements that address items that have been difficult nationwide could be cited as noteworthy practice.

List of 2021 Certification Review Recommendations:

Review Area	Recommendations
MPO Structure and Agreements (4.2)	1. EWGCOC should place performance based planning agreements on their webpage for easy access and public transparency.
Unified Planning Work Program (4.3)	2. EWGCOG become more familiar with the State Planning & Research (SPR) annual work products.

Metropolitan Transportation Plan (4.4)	3. EWGCOG should re-evaluate their MTP project solicitation process and communication of evaluation criteria to local public agencies (LPAs) for inclusion of regionally significant projects at the time of the MTP update, including consideration of developing a formalized written procedure. In addition, the ONEDOT will complete a planning process review of the EWGCOG's work efforts to provide additional assistance and oversight of these efforts.
Transportation Improvement Program (4.5)	4. The EWGCOG staff members should utilize the various FMIS Training options made available on the FMIS website and participate in FMIS Focus Group webinars and training opportunities.
Public Participation (4.6)	5. The EWGCOG Public Involvement Plan should better describe the opportunities and timeframes on how the public can be involved in the transportation planning process.
Civil Rights (Title VI, EJ, LEP, ADA) (4.7)	6. EWGCOG should develop and implement a process for completing system-level comparative analysis of the St. Louis region transportation system's benefits and burdens, that compares minority/low-income populations to non-minority/low income populations. ONEDOT to provide technical assistance, training opportunities, and best practice resources.
Transportation Safety and Security (4.9)	<p>7. EWGCOG and the Illinois Department of Transportation should work together on development and implementation of the Strategic Highway Safety Plans efforts in St. Clair, Madison and Monroe Counties.</p> <p>8. As a regional leader, the EWGCOG should consider establishing a Regional Safety Committee with MPO members and other safety advocates to advance safety issues in the Region.</p>
Air Quality (4.11)	<p>9. MoDOT should take steps to formulate written process and procedures for completing the CMAQ Annual Report. Consideration should be given to implementing a process that involves the EWGCOG in entering project data directly into the CMAQ Project Tracking System (PTS).</p> <p>10. FHWA provide CMAQ Annual Report training, as needed, to EWGCOG and MoDOT.</p> <p>11. MoDOT federal funding transfer process include the identification of the requirement, at the close of the project, for unexpended (surplus) federal funds and thus obligation authority be returned to FHWA and the MoDOT.</p> <p>12. EWGCOG develop a formalized policy that outlines the need for transferred, but unexpended (surplus) CMAQ funds, to be returned to MoDOT at the time of the awarded project's completion</p>

Congestion Management Process / Management and Operations (4.12)	13. EWGCOG should continue to encourage the members to develop ITS Strategic Deployment plans.
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List of 2021 Certification Review Commendations:

Review Area	Commendation
Transit Planning (4.4)	1. EWGCOG and Metro transit oriented development efforts to integrate elements such as land use and neighborhood context into the transit planning process.
Transportation Improvement Program (4.5)	2. EWGCOG 2018 work effort that produced an updated STP-S project development and selection process that has proven to better ensure that projects of all types are considered equally for funding, based on a performance-driven approach.
Public Participation (4.6)	3. EWGCOG's establishment of a goal, objectives, and a strategy framework for its' public involvement plan (PIP) with regular reviews on the progress on each goal
Civil Rights (Title VI, EJ, LEP, ADA) (4.7)	4. The Title VI documents on EWGCOG's public website are easily accessible to the public. The website includes detailed information on how to access the Title VI Plan, dates and times of the virtual Open House events, and the many ways to submit comments on the draft Title VI Plan. Additional documents that are easily accessible include the complaint procedures and the Limited English Proficiency Plan.
Freight Planning (4.8)	5. EWGCOG's ongoing effort to champion the integration of freight movement into the overall St. Louis metropolitan planning process, including the project prioritization and selection for programming. 6. The EWGCOG, MoDOT and the St. Louis Regional Freightway's partnering effort to formulate the St. Louis regional element of the Missouri Statewide Freight Advisory Committee framework.
Transportation Safety and Security (4.9)	7. EWGCOG's efforts in coordination and communication with the standing committees regarding the Metro Security study objectives.
Non-Motorized Planning/Livability (4.10)	8. EWGCOG's outreach efforts in bicycle and pedestrian planning with their development of such tools as the Bicycle Planning Guide and the Bicycle and Pedestrian Crash Analysis as well as hosting various popular workshops for multimodal planning.
Congestion Management Process / Management and Operations (4.12)	9. The EWGCOG's ongoing efforts to utilize the Congestion Management and Operations Committee (CMOC) and Technical Action Committee (TAC) to share information, providing assistance for member agencies and encouraging Intelligent Transportation System (ITS) investment in the region and seeking funding for ITS projects

2.0 INTRODUCTION

2.1 Background

Pursuant to 23 U.S.C. 134(k) and 49 U.S.C. 5303(k), the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) must jointly certify the metropolitan transportation planning process in Transportation Management Areas (TMAs) at least every four years. A TMA is an urbanized area, as defined by the U.S. Census Bureau, with a population of over 200,000. In general, the reviews consist of three primary activities: a site visit, a review of planning products (in advance of and during the site visit), and preparation of a Certification Review Report that summarizes the review and provides findings. The reviews focus on compliance with Federal regulations, challenges, successes, and experiences of the cooperative relationship between the MPO's, the State DOT's, and public transportation operator(s) in the conduct of the metropolitan transportation planning process. Joint FTA/FHWA Certification Review guidelines provide agency field reviewers with latitude and flexibility to tailor the review to reflect regional issues and needs. Consequently, the scope and depth of the Certification Review reports vary significantly.

The Certification Review process is only one of several methods used to assess the quality of a regional metropolitan transportation planning process, compliance with applicable statutes and regulations, and the level and type of technical assistance needed to enhance the effectiveness of the planning process.

While the Certification Review report itself may not fully document the many intermediate and ongoing checkpoints, the findings of Certification Review are based upon the cumulative findings of the entire review effort.

The content of this report and particularly the current status narratives include information from on-site discussions and EWGCOG staff responses to the certification review team's guideline questions that were submitted to the MPO and were completed prior to the onsite review.

2.2 Purpose and Objective

Since the enactment of the Intermodal Surface Transportation Efficiency Act (ISTEA) of 1991, the FHWA and FTA, are required to jointly review and evaluate the transportation planning process in all urbanized areas over 200,000 in population to determine if the process meets the Federal planning requirements in 23 U.S.C. 134, 49 U.S.C. 5303, 23 CFR 450, and 49 CFR Part 613. The Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU) extended the minimum allowable frequency of certification reviews to once at least every four years.

The purpose of the certification review is to determine if the planning process can be certified as satisfying the requirements in the metropolitan planning regulations (23 CFR 450 and 49 CFR 613). This review had the following objectives:

1. Determine if the metropolitan transportation planning activities are being carried out in accordance with the planning requirements of 23 U.S.C. 134 and 49 U.S.C. 5303.
2. Determine if the metropolitan transportation planning process is a continuing, cooperative, and comprehensive process that results in the support and development of transportation improvements for the overall St. Louis metropolitan area.
3. Determine if the metropolitan transportation planning process provides adequate representation and input from all levels of local and state government, minority and low-income populations, and individual interest groups in addressing the transportation needs of the metropolitan area.
4. Verify that the EWGCOG's transportation planning process can be certified as being in compliance with current transportation planning law.
5. Provide advice and guidance to the EWGCOG for enhancing and improving planning process and the quality of their transportation investment decisions.
6. Identification of noteworthy practices, which can be shared with other states, MPOs, and transit operators.

The EWGCOG is the designated MPO for the St. Louis urbanized area. Both MoDOT and IDOT are the responsible State agencies and Bi-State Metro, Madison County Transit, St. Clair County Transit District, and Loop Trolley are the responsible public transportation operators. Current membership of the EWGCOG MPO consists of elected officials and citizens from political jurisdictions in the St. Louis urbanized area. The metropolitan planning area includes all of St. Louis urbanized area with the City of St. Louis as the largest population center.

Certification of the planning process is a prerequisite to the approval of Federal funding for transportation projects in such areas. The certification review is also an opportunity to provide assistance on new programs and to enhance the ability of the metropolitan transportation planning process to provide decision makers with the knowledge they need to make well-informed capital and operating investment decisions.

Federal Review Team Members:

Eva Steinman, Community Planner, FTA Region VII (Review Co-Team Leader)
April McLean-McCoy, Community Planner, FTA HQs

Victor Austin, Community Planner, FTA HQs
Brad McMahon, Transportation Specialist, FHWA Missouri Division (Review Co-Team Leader)
Betsy Tracy, Transportation Specialist, FHWA Illinois Division
Steven Minor, PDP Community Planner, FHWA Missouri Division

3.0 SCOPE AND METHODOLOGY

3.1 Review Process

The previous certification review was conducted in FY 2017. A summary of the status of findings from that review is provided in Appendix B. This report details the current review, which consisted of 3 virtual onsite meetings and a virtual public hearing opportunity, conducted January 21-29, 2021. The virtual public hearing was held on January 21, 2021.

The 2021 certification review covers the metropolitan transportation planning process conducted cooperatively by the MPO, MO and IL State DOTs, and public transportation operators. Statutory and regulatory basis, current status, and findings are summarized in the body of the review's Final Report.

Participants in the review included representatives of FHWA-MO/IL, FTA- Region VII and HQ office, MoDOT, IDOT, Bi-State Metro, Madison County Transit, St. Clair County Transit District, Loop Trolley, and EWGCOG MPO staff among others. A full list of participants is included in Appendix A.

The 2021 risk-based review focused on the high-risk areas, both threats and opportunities, and did not attempt to cover every planning topic.

An office desk audit of current documents and correspondence was completed prior to the conduct of the virtual onsite meetings. Review guideline questions, that reflect current federal regulations, were provided to the MPO. The MPO staff and planning partners provided very detailed and informative responses to the Federal Team's questionnaire prior to the Virtual onsite meetings.

The virtual onsite meeting discussion agenda was focused on those specific areas where the EWGCOG's has the greatest risk for non-compliance and topics that will have the greatest impact for improving upon the EWGCOG's delivery of a continuous, cooperative and comprehensive planning process.

In addition to the office desk and virtual onsite review, routine oversight mechanisms provide a major source of information upon which to base the certification findings.

3.2 Documents Reviewed

The following MPO documents are a sample of planning work products that were evaluated as part of this certification review:

- MPO By-Laws Agreement, 2005
- MOU Between EWGCOG and the Missouri Highways and Transportation Commission
- MOU between the EWGCOG and the St. Louis area public transit providers
- FY 2021 Unified Planning Work Program for the EWGCOG MPO
- EWGCOG MTP, *Connected2045*
- EWGCOG FY-2021-2024 TIP and Self-Certification
- Where We Stand- The Strategic Assessment of the St. Louis Region 7th Edition
- Community Connections- Public Participation Plan
- EWGCOG Title VI Plan
- CHSTP-Coordinated Human Services Transportation Plan

3.3 Input from the Public, Officials, and Member Agencies Staffs

Providing opportunities for public participation is a cornerstone of the transportation planning process defined in Title 23 and Title 49. State DOTs, MPO's, and transit operators are required to provide for opportunities for public input and to consider their views when making decisions on the use of federal funding assistance. With the passage of the Transportation Equity Act for the 21st Century (TEA-21) in 1998, a public involvement component was statutorily mandated for the MPO certification review process.

A virtual public meeting was conducted as part of the Certification Review on the evening of January 21, 2021 from 5:30 – 7:00 PM. There were no public citizens that chose to participate in the virtual public meeting. A comment period was provided for a 7-day period following the close of the virtual meeting. No public comments were received.

The Certification Review Team made a presentation to the EWGCOG Executive Advisory Committee (EAC) as part of their regularly scheduled January 19, 2021 meeting. The presentation included a power point overview of the Certification Review process and an invitation to the EAC members to provide input for the review. The same review team presentation was delivered to the EWGCOG Board of Directors (BOD) as part of their regularly scheduled January 27, 2021 meeting.

4.0 PROGRAM REVIEW

4.1 Metropolitan Planning Area Boundaries and Functional Classification

Metropolitan Planning Area Boundaries:

4.1.1 Statutory and Regulatory Basis

23 U.S.C. 134(e) and 23 CFR 450.312(a) state the boundaries of a Metropolitan Planning Area (MPA) shall be determined by agreement between the MPO and the Governor. At a minimum, the MPA boundaries shall encompass the entire existing urbanized area (as defined by the Bureau of the Census) plus the contiguous area expected to become urbanized within a 20-year forecast period for the MTP.

4.1.2 Current Status

The designated Metropolitan Planning Organization for the St. Louis Urbanized is East-West Gateway Council of Governments (EWGCOG).

The decennial 2020 Census has been underway since the last certification review. The U.S. Census Bureau is still tabulating and verifying the final results of the 2020 Census. After the results of the Census are determined, the urbanized and MPA boundaries should be evaluated again to ensure at a minimum 20 years of forecasted urbanized growth is included in the MPA. If there is a change to the urbanized area and/or adjusted urbanized area, EWGCOG and State DOT staff would work together to discuss the modification and review for relevance and consistency with all state and federal guidelines/regulations. The recommendations would be sent to the MPO transportation committees for concurrence and approval.

EWGCOG has opted to define the geographic boundaries of its MPA at the county level. The MPO Planning Area boundaries include the Missouri counties of St. Louis, St. Charles, Franklin and Jefferson and the city of St. Louis. In Illinois, the MPO boundaries include Madison, St. Clair and Monroe Counties.

Functional Classification:

The EWGCOG accepts functional reclassification requests biannually during the months of May and November. Announcements are posted on the EWGCOG's website and through their e-newsletter, *Local Government Briefings*. Applicants may download an application and guidelines from the EWG's website. The review, analysis and approval process has not changed since the 2017 Certification Review.

4.1.3 Findings:

The EWGCOG satisfies the federal requirements related to metropolitan planning area boundaries and functional classification.

4.2 MPO Structure and Agreements

4.2.1 Statutory and Regulatory Basis

23 U.S.C. 134(d) and 23 CFR 450.314(a) state the MPO, the State, and the public transportation operator shall cooperatively determine their mutual responsibilities in carrying out the metropolitan transportation planning process. These responsibilities shall be clearly identified in written agreements among the MPO, the State, and the public transportation operator.

4.2.2 Current Status

The EWGCOG was established in 1965 by the Governors of Missouri and Illinois. Their by-laws lay out the membership of the Board of Directors and establish committee structure. The Board of Directors is comprised of 24 voting members and 5 non-voting members who represent agencies and governments from throughout eight counties in Missouri and Illinois. This area includes five counties (including the City of St. Louis) in Missouri, and three counties in Illinois. By-laws have not been changed since the last certification review.

In 2014, EWGCOG applied for a waiver regarding the MAP-21 requirement that mandates transit representation on the Board of Director policy committee. This waiver request was received and approved by the FTA- Region VII office and remains in effect. The revised MPA was approved by the Illinois governor on September 11, 2014.

EWGCOG has a 2004 Memorandum of Understanding (MOU) with the Missouri Highways and Transportation Commission and a 2007 Illinois MPO Cooperative agreement between EWGCOG, IDOT, Metro, Madison County Transit, and St. Clair County Transit District to coordinate and cooperate in the federally mandated planning process.

The Transportation Planning Committee consists of transportation oriented staff members appointed by the Board representing local jurisdictions. In addition, members of all implementing agencies are represented as well as other modal and resource interests.

The Air Quality Advisory Committee is appointed by the Board and consists of members of the federal and state resource agencies, transportation agencies and environmental interests. This committee considers matters concerning the relationship between air quality and transportation.

The Paratransit Advisory Committee includes individuals in the region who are knowledgeable about the transportation needs of the elderly, the disabled and others with special needs.

The Transportation Safety Advisory Committee considers matters concerning the state of the region's roadways as they relate to safety and methods to improve safety.

Major Transit Operators in the MPA include Bi-State Metro, Madison County Transit and St. Clair County Transit.

4.2.3 Findings:

The EWGCOG satisfies the federal requirements related to MPO structure and agreements.

Recommendation #1: EWGCOG make their transportation planning agreements available for viewing on the EWGCOG's website.

4.3 Unified Planning Work Program

4.3.1 Statutory and Regulatory Basis

23 CFR 450.308 sets the requirement that planning activities performed under Titles 23 and 49 U.S.C. be documented in a Unified Planning Work Program (UPWP). The MPO, in cooperation with the State and public transportation operator(s), shall develop a UPWP that includes a discussion of the planning priorities facing the MPA and the work proposed for the next one- or two-year period by major activity and task in sufficient detail to indicate the agency that will perform the work, the schedule for completing the work, the resulting products, the proposed funding, and sources of funds.

4.3.2 Current Status

EWGCOG is currently operating under planning programming from the FY 2021 UPWP (July 1, 2020 - June 30, 2021). Current and past UPWPs can be found on EWGCOG's website at <https://www.ewgateway.org/about-us/what-we-do/planning-initiatives/upwp/>. The Council's staff directors convene each year to discuss the work requirements for the upcoming fiscal year. The CFO provides a general estimate of the agency's budget by program area for the upcoming year and this budget estimate frames the size of the overall program. The development process begins with a review of the agency's current work program and the identification of those elements that will be carried on into the next fiscal year. The staff then evaluates and modifies the work elements as necessary to support on-going agency programs and to meet federal requirements. Once those necessary elements are created, staff evaluates major issues, emerging trends, and federal emphasis areas and identifies subject

areas that fit with the agency's policy agenda, sphere of influence, and staff resources.

Once the work elements are selected and written, the directors assign staff hours to each element. The work program budget to ensure the funding will support the work from the appropriate federal, state and local sources. The UPWP is provided to the Board of Directors for review in March, and a month later, after review by funding agencies, the Board receives the final UPWP for approval.

The work elements of the UPWP relate directly to strategies identified in long range Metropolitan Transportation Plan Connected 2045. The UPWP supports the 10 guiding principles and established goals of the Connected 2045 MTP and defines planning activities that support locally defined goals.

The EWGCOG's budget is generally expended each fiscal year. Some project elements may extend to a second fiscal year if they are not completed. Most work has continued to be completed in a timely fashion, despite the COVID-19 pandemic.

Several regionally significant corridor transportation studies have been initiated or completed through the EWGCOG or Agency members since the last Certification Review including:

- Northside-Southside MetroLink Conceptual Design Study (EWGCOG)
- Northside-Southside MetroLink Technological Alternatives Analysis (Metro/City of St. Louis)
- Northside-Southside Transit Oriented Development Study (Metro)
- I-270 North Corridor Study (MoDOT)
- I-270 Phase 1 Study (IDOT)
- I-70 Planning & Environmental Linkages Study (MoDOT)
- MO N Corridor Study (MoDOT)
- Non-Interstate Truck Corridor Study (St. Louis Freightway)
- Great Streets Studies – Forest Park, Kimmswick, Bevo Community, Collinsville, Alton, Frenchtown and Mascoutah (EWGCOG)

4.3.3 Findings:

During the Certification Review, it was observed that the EWGCOG's staff is not familiar with the MoDOT and IDOT annual programming of available federal and state planning funds or the State Planning & Research (SPR) planning work products developed by both state agencies and approved by ONE DOT in Missouri and the FHWA Illinois Division in Illinois.

Most of the programmed planning work is completed during the fiscal year. Some projects are extended beyond a fiscal year, generally due to extenuating circumstances. The EWGCOG operates on a 12-month contract with Missouri and currently has an 18-month contract with Illinois.

Recommendation #2: EWGCOG become more familiar with the State Planning & Research (SPR) annual work products.

4.4 Metropolitan Transportation Plan

4.4.1 Statutory and Regulatory Basis

23 U.S.C. 134(c), (h) & (i) and 23 CFR 450.324 set forth requirements for the development and content of the Metropolitan Transportation Plan (MTP). Among the requirements are that the MTP addresses at least a 20-year planning horizon and includes both long and short -range strategies that lead to the development of an integrated and multi-modal system that to facilitates the safe and efficient movement of people and goods in addressing current and future transportation demand.

As a key product resulting from a continuing, cooperative, and comprehensive (“3-C”) multimodal transportation planning process, the MTP needs to consider all applicable issues related to the transportation systems development, land use, employment, economic development, natural environment, and housing and community development.

23 CFR 450.324(c) requires the MPO to review and update the MTP at least every four years in air quality nonattainment and maintenance areas and reflect current and forecasted transportation, population, land use, employment, congestion, and economic conditions and trends.

Regarding the types of projects to be included in the MTP, 23 CFR 450.324(f)(9) requires (underlined text is for emphasis) “Design concept and design scope descriptions of all existing and proposed transportation facilities in sufficient detail, regardless of funding source, in nonattainment and maintenance areas for conformity determinations under the EPA’s transportation conformity regulations (40 CFR Part 93, Subpart A). In all areas (regardless of air quality designation), all proposed improvements shall be described in sufficient detail to develop cost estimates.”

Additionally, as part of the financial plan that accompanies the MTP, 23 CFR 450.324(f) (11)(ii) requires (underlined text is for emphasis) “All necessary financial resources from public and private sources that are reasonably expected to be made available to carry out the transportation plan shall be identified.” However, in meeting that requirement, 23 CFR 450.324(f)(11) (v) provides some flexibility by stating “For the outer years of the metropolitan transportation plan (i.e., beyond the first 10 years), the financial plan may reflect aggregate cost ranges/cost bands, as long as the future funding source(s) is reasonably expected to be available to support the projected cost ranges/cost bands.”

4.4.2 Current Status:

EWGCOG's current MTP, *Connected2045*, was approved by its Board of Directors on June 26, 2019. Based upon input from regional citizens and stakeholders and guidance from local elected officials, *Connected2045* guides transportation priorities and decision-making in the St. Louis region over the next 25 years. *Connected2045* establishes a project and policy based framework that will be implemented through a variety of short-range transportation plans and programs. EWGCOG recognizes the policies established by *2045Connected* as the MPO's guide for prioritizing Federal funding for all modes of transportation—including public transportation, freight, bicycle, pedestrians, and paratransit.

Connected2045 consists of two publications. First, is a summary text that succinctly communicates regional challenges and offers a multimodal performance management desired outcome dashboard. The second document is the State of the System Report that includes a more technical and in-depth examination of the region's assets, demographics, economic trends, congestion and regional mobility challenges. These two publications are available for viewing at: <https://www.ewgateway.org/transportation-planning/long-range-planning/>.

The 2019 update to the MTP included a survey of needs and priorities for the region's transportation system, evaluations of major state highway and regional transit system projects, updated strategies, air quality conformity determination, and federal performance measures and targets for the region. EWGCOG conducted public outreach during the *Connected2045* development process by conducting a speaker series, workshops, and a formal public comment period. *Connected2045* includes EWGCOG's further refinement of the agency's overall investment strategy by including additional, updated performance measures along with quantifiable targets. Additionally, EWGCOG has incorporated the Federal performance measures related to congestion mitigation and air quality improvement into the MTP update and established targets for each of the measures (annual hours of peak hour excessive delay, percent of non-single occupancy vehicle travel, and total emissions reduction). Moreover, EWGCOG has established strategies within the MTP to address air quality and environmental assets in the region.

Inclusion of LPA Regionally Significant Projects in MTP "Outer Years" (Beyond "Year 4")

While EWGCOG recognizes the priority project list included in *Connected2045* focuses on regionally significant transportation projects, there currently is only one local public agency (LPA) project presented in *Connected2045*. It is uncommon for a metropolitan planning area the size of EWGCOG to have a small number of local projects programmed in their MTP and often LPAs will identify projects in their own locally developed transportation plans that should be considered for inclusion in the MPO's MTP. The Federal Team has concerns whether the solicitation, evaluation, and selection processes of EWGCOG's MTP project list creation process adequately accounts for all planned projects in the St. Louis metropolitan area in a sufficiently comprehensive and collaborative manner. For example, the Federal Review Team is aware of at

least one LPA developing an environmental determination for a project that could potentially be considered regionally significant and is planned for implementation within the horizon period of *Connected2045*. The Federal Review Team has informed EWGCOG that in such cases, the LPA project will need to be shown in the fiscally constrained element of the *Connected2045* MTP for the FHWA Missouri Division to approve the completed environmental determination. The lack of inclusion of the example project in the current MTP has resulted in an untimely bottleneck in project implementation due to the last-minute MTP amendment.

4.4.3 Finding:

When developing the updated *Connected2045* in 2019, EWGCOG solicited for locally-sponsored regionally significant projects. That solicitation advised local agencies of the requirement for the project proposal to include a reasonable financial plan. However, the adopted *Connected2045* MTP continued to include only one LPA regionally significant project in the fiscally constrained element of the document's "outer years" and no LPA regionally significant projects in the MTP's illustrative section.

23 CFR 450.300 requires the EWGCOG to deliver a continuing, cooperative, and comprehensive ("3-C") multimodal transportation planning process. The EWGCOG has developed the *Connected 2045* MTP that includes long and short-range strategies leading to the development of an integrated and multi-modal system. However, the continued absence of regionally significant LPA projects in the "outer years" (beyond "Year 4") of the *Connected2045* MTP and/or the "illustrative" section compels the Federal Review Team to question the effectiveness of the EWGCOG solicitation and project evaluation process for regionally significant LPA projects.

EWGCOG recognizes that a principal goal of the MTP is to establish priorities for the use of Federal funds on the state highway and regional transit systems. Consistent with that approach is EWGCOG's belief that decisions on local projects seeking Federal funds are most appropriately made in the TIP. While FHWA/FTA agree that decisions determining the specific uses of Federal funding are best made as part of the EWGCOG project (STBG and CMAQ) prioritization and selection processes conducted at the outset of annual TIP updates, equally important are the Federal requirements to include all regionally significant projects (regardless of funding source) in a financially constrained MTP document covering the entire planning horizon (see 23 CFR 450.324(f)(9), 23 CFR 450.324(f)(11)(ii), and 40 CFR 93.106(2)(ii)). Within 23 CFR 450.104 and 40 CFR 93.101, a *regionally significant project* is defined as being *"...on a facility that serves regional transportation needs (such as access to and from the area outside the region; major activity centers in the region; major planned developments such as new retail malls, sports complexes, or employment centers; or transportation terminals) and would normally be included in the modeling of the metropolitan area's transportation network. At a minimum, this includes all principal arterial highways and all fixed guideway transit facilities that offer an alternative to regional highway travel."*

EWGCOG's reluctance to include regionally significant LPA projects beyond the first four years

of the financially constrained EWGCOG MTP coupled with the Federal Review Team's concerns regarding the project solicitation and evaluation process raises question as to the effectiveness of EWGCOG's efforts to comply with the requirements for MPOs to include all regionally significant projects within the financially constrained MTP (regardless of funding source). These requirements are outlined within the FHWA/FTA metropolitan transportation planning regulations (notably 23 CFR 450.324(f)(9) and 23 CFR 450.324(f)(11) (ii)) and EPA's transportation conformity regulations (notably 40 CFR 93.106(2)(ii)).

Recommendation #3: EWGCOG should re-evaluate their MTP project solicitation process and communication of evaluation criteria to local public agencies (LPAs) for inclusion of regionally significant projects at the time of the MTP update, including consideration of developing a formalized written procedure. In addition, the ONEDOT will complete a planning process review of the EWGCOG's work efforts to provide additional assistance and oversight of these efforts.

4.5 Transit Planning

4.5.1 Statutory and Regulatory Basis

49 U.S.C. 5303 and 23 U.S.C. 134 require the transportation planning process in metropolitan areas to consider all modes of travel in the development of their plans and programs. Federal regulations cited in 23 CFR 450.314 state that the MPO in cooperation with the State and operators of publicly owned transit services shall be responsible for carrying out the transportation planning process.

4.5.2 Current Status:

Transit planning in the St. Louis region is predominantly conducted by the four transit operators, particularly in the areas of route design, amenities, and frequency. Area transit operators additionally provide EWGCOG with financial information and a program of capital projects for the development of the area's TIP.

The largest transit provider in the St. Louis area is Metro, a division of Bi-State Development Agency consisting of: 1) MetroLink, the 46 mile, 38-station light rail system, 2) MetroBus, a 400-vehicle bus fleet with a service area of about 600 square miles, and 3) Metro Call-A-Ride, a wheelchair lift-equipped paratransit service. Metro has service on both sides of the state line in the region in Missouri and Illinois. The other transit providers in the metropolitan area are Madison County Transit and St. Clair County Transit District in Illinois, and the Loop Trolley on the Missouri side. The various agencies coordinate regularly through a series of informal and formal meetings to ensure consistency, cooperation, and a good working relationship.

The St. Louis area transit providers and EWGCOG coordinate planning activities on a variety of levels, from data sharing to participating in the development of regional plans including ongoing coordination for the development of transit performance measures and target setting. EWGCOG was involved in the recent Metro Reimagined service plan and the TOD planning study for the Northside-Southside transit corridor. The two agencies have also collaborated for revisions to the STP project evaluation process. Additionally, Metro, MoDOT, and the Council coordinate on corridor studies through the Transportation Corridor Improvement Group (TCIG). As part of this group, the TCIG recently collaborated on the I-70 Planning and Environmental Linkages (PEL) study, as well as other corridor studies in the past and plans for upcoming studies such as the I-64 corridor study.

Close cooperation between the agencies also occurs in paratransit planning and programming, with EWGCOG taking the lead in preparing the Coordinated Human Services Transportation Plan (CHSTP). THE EWGCOG Board of Directors recently approved an update to the CHSTP in May 2020. The MPO facilitated a variety of outreach and stakeholder involvement during the development of the update. The coordinated human services transportation plan update identified six overarching goals with specific strategies to help alleviate gaps identified in the service network. In addition, the MPO and Metro developed the Bi-State Development Disability Transportation Resource Networks to share information, engage in collective problem solving, leverage resources, and generate innovative solutions related to transition, access, and mobility for those living with disabilities in the St. Louis region. The Network meets quarterly to discuss these issues. Metro is responsible for administration of the Section 5310 projects for the MPO and the MPO conducts an annual solicitation for Section 5310 projects.

Metro and the MPO continue to work together on several initiatives related to integrating land use and neighborhood context into the transportation planning process and transit projects. Metro, with participation from EWGCOG and MoDOT, conducted a transit oriented development study on the proposed Northside-Southside MetroLink expansion. The regional transit advocacy agency has a TOD working group with representatives from the transit agency, MPO, and local municipalities meet to discuss development at or near light rail stations. EWGCOG's Template Form Based Code, which was originally developed through the 2013 regional TOD study and is a template for land development regulations focusing on physical form rather than separation of uses, has recently been applied to a development proposal at the North Hanley MetroLink station as well as the redevelopment underway at the Forest Park MetroLink station. Form Based Codes have also been developed for other station areas for future developments. Finally, EWGCOG's Great Streets Initiative program provides planning assistance with an emphasis in integrating transportation and land use at the community and corridor scales. The program enables communities in the region to make coordinated, short term incremental investments that build toward long-term broadly considered goals in the areas of land use and transportation network compatibility, accommodation of all modes, economic vibrancy, and environmental responsibility.

Notable capital projects in the region that are currently in various stages of the planning process include the creation of mobility hubs, a MetroLink expansion, and the evaluation of the

Northside-Southside corridor. Metro is investing in key transfer points throughout their network to construct Community Mobility Hubs. These hubs will have a larger footprint than typical bus stops in order to create a safer, more comfortable space for transfers and connectivity between modes. St. Clair County Transit District received funding from the State of Illinois to construct a MetroLink extension to the Mid-America Airport that is expected to be in operation by 2025. Finally, the City of St. Louis, with participation from Metro and other relevant stakeholders, is continuing examination of financial feasibility and mode sustainability on the Northside-Southside transit corridor with a technology alternatives study.

Ridership Trends:

Total transit ridership in the St Louis urbanized area is comprised of bus, demand response, paratransit and light rail transit modes. Most transit systems nationwide were experiencing a small but steady downward decline in ridership prior to the COVID-19 pandemic of 2020. The St. Louis region was subject to this shift at a greater amount than many peer agencies. Metro conducted a Comprehensive Operational Analysis in fall of 2019 resulting in the restructuring of the MetroBus system on the Missouri side in addition to a continued focus on customer-first policies and programs. There were early indications that the downward trend in ridership was reversing, however only five months of data was able to be collected after the restructuring before the pandemic greatly impacted transit trends nationwide. Metro is exploring options to increase ridership including overhaul of their fare collection system, improving amenities at key transfer points through their Community Mobility Hub program, and possible redesign of the MetroBus system on the Illinois side such as what was completed on for the Missouri portion of the system.

4.5.4 Findings:

The St. Louis Urbanized Area meets all requirements listed under 23 CFR 450.314.

Commendation #1: EWGCOG and Metro’s transit oriented development efforts to integrate elements such as land use and neighborhood context into the transit planning process.

4.6 Transportation Improvement Program

4.6.1 Statutory and Regulatory Basis

23 U.S.C. 134(c), (h) & (j) set forth requirements for the MPO to cooperatively develop a Transportation Improvement Program (TIP). Under 23 CFR 450.326, the TIP must meet the following requirements:

- Must cover at least a four-year horizon and be updated at least every four years.

- Surface transportation projects funded under Title 23 U.S.C. or Title 49 U.S.C., except as noted in the regulations, are required to be included in the TIP.
- List project description, cost, funding source, and identification of the agency responsible for carrying out each project.
- Projects need to be consistent with the adopted MTP.
- Must be fiscally constrained.
- The MPO must provide all interested parties with a reasonable opportunity to comment on the proposed TIP.

4.6.2 Current Status:

EWGOG's develops a Transportation Improvement Program for the St. Louis region annually. The TIP is a financial and implementation schedule for projects receiving federal transportation funding in the St. Louis region. Projects identified in the TIP are prioritized from, and must be consistent with, the St. Louis region's 20-year *Connected2045* MTP.

The current TIP for the St. Louis area covers Fiscal years (FY) 2021-2024 and was approved by the EWGCOG Board of Directors on August 26, 2020, the Missouri Governor on August 27, 2020, and the ONE DOT (FHWA Missouri Division and FTA Region VII) on September 10, 2020.

EWG modifies the TIP annually by adding a new fourth year and advancing the first of its future years to current status. While the projects in the TIP are shown for a four-year time period, the emphasis is on the first three years. Presenting a four-year span allows for a more systematic forecast of funding needs during a four-year planning cycle, and provides a more comprehensive view of the program for public information purposes.

Throughout the TIP fiscal year, project sponsors' requested modifications to programmed projects are the addition of new projects, are processed in accordance with the EWGCOG's formalized TIP modification policy.

The EWGCOG makes its TIP and all TIP modifications available to the public through its website at: <https://www.ewgateway.org/transportation-planning/transportation-improvement-program/>

TIP Project Development and Selection Process (STP-S and CMAQ Funded Projects)

Projects selected within the EWGCOG planning process and included in the TIP are consistent with and based on the ten principles that make up the framework of *Connected2045* MTP. The policies in *Connected2045* reflect regional and national goals and guide the prioritization of federal funding for all modes of transportation, including roads, bridges, public transportation, freight, bicycle, pedestrian, and paratransit. Decisions on local projects competing for federal funds are made through the annual TIP selection process, which evaluates projects according to

the *Connected2045* principles.

Local transit agencies include Metro, Madison County Transit, St. Clair County Transit District, and Loop Trolley. During the annual update of the TIP, these agencies submit their programs to EWGCOG. These programs are checked to verify if they meet the framework of the long-range plan and Air Quality Conformity, and the programs are typically included as-is in the TIP.

If these agencies submit applications for funding through the Surface Transportation Block Grant Program-Suballocated or Congestion Mitigation and Air Quality Improvement Program, the applications are evaluated and selected for inclusion in the TIP based on the scoring parameters of each program.

Since the 2017 review, to better align with the goals of *Connected2045*, the EWGCOG Transportation Planning Committee (TPC) and Board of Directors approved an updated Surface Transportation Block Grant Program (STP-S) - Suballocated project development and selection process; that included STP-S scoring criteria. The approval included a recommendation to monitor the evaluation process and assess the scoring criteria after two funding rounds.

During both rounds, staff hosted several project development workshops across the region to discuss program requirements and to explain the new application process and updated STP-S scoring criteria. Staff also hosted multiple project review workshops to provide feedback on specific projects and met with sponsors individually to discuss potential applications. An FAQ document was also developed to answer questions received during each funding round.

Staff administered a survey after each application deadline to receive feedback about the application process and STP-S scoring criteria. Both the 2018 and 2019 surveys showed that project sponsors felt that the project development workshops helped them gain a better understanding of the STP-S scoring criteria and application types. Application process improvements noted by sponsors included:

- EWGCOG staff are accessible and provide support during the application process
- The process is simplified and easy to understand
- The applications are more relevant to the project type, straightforward, and downloadable and easier to fill out
- The scoring criteria are clearer and easier to follow, more objective, and are based on quality rather than cost

4.6.3 Finding:

Commendation #2: EWGCOG's 2018 work effort that produced an updated STP-S project development and selection process that has proven to better ensure that projects of all types are considered equally for funding, based on a performance-driven approach.

Collaborative TIP Update Work Effort

The MoDOT and IDOT recognize the federal planning requirement for their agencies to coordinate with the EWGOG in a manner that allows EWGCOG the opportunity to review and comment on the respective state programming of projects located within the St. Louis Metropolitan Planning area (MPA). The timing of this early stage involvement should be at the time each State Department of Transportation (SDOT) is developing projects for inclusion in each agency's STIP. In 2021, the review team observed no change in the level of EWGCOG participation in the early stages of the IDOT STIP project development and selection process.

The 2017 Final Report recommended that the EWGCOG and IDOT work together to improve the opportunity for the EWGCOG's meaningful participation in the IDOT STIP project development and selection process involving IDOT sponsored projects located within the St. Louis Metropolitan Planning area (MPA) and that will be submitted for inclusion in the EWGCO TIP.

4.6.4 Finding:

In 2021, the review team observed a sound level of early MoDOT and EWGCOG collaboration and coordination in connection with the MoDOT's development and selection of projects located within the MPA for inclusion in the MoDOT STIP and EWGCOG TIP. However, there was no change in the level of EWGCOG participation in the early stages of the IDOT project development and selection process.

The opportunity for EWGCOG to review and provide input on programming decisions to IDOT continues to occur during the development of the annual TIP update in August or mid-year conformity amendment in January (as has occurred the last two years).

EWGCOG Staff Members Access to the Financial Management and Information System (FMIS)

The 2017 Final Report recommended that FHWA Missouri Division and MoDOT help the EWGCOG obtain Category 2 (read only access) access to the Fiscal Management Information System 5.0 (FMIS5-P). Since the 2017 review, some EWG staff members have been given access to the Missouri FMIS and CMAQ portals within the UPACS. The access to FMIS has helped EWGCOG staff to identify projects that have obligated funds before getting notices from MoDOT or projects in the process of getting funds obligated. If an obligation request is denied, staff has followed up with MoDOT to determine what is needed to move obligation along. EWGCOG also finds their access to historical funding information was helpful.

The 2017 Final Report also recommended that The FHWA Missouri Division and MoDOT deliver training to the EWGCOG staff in how to maximize the value and efficiency of their Category 2 (read only access) access experience.

In 2021, it is observed that EWGCOG staff's utilization of FMIS has been done without receipt of any training. The EWGCOG has identified that there would be value in their receipt of FMIS

training in the future.

4.6.5 Finding:

At the current time, there is a limited opportunity for the FHWA Missouri Division and MoDOT to deliver formalized FMIS training. However, the review team encourages the EWGCOG staff members to access and utilize FMIS Training options offered through the FMIS website, and shown below.

The FHWA Missouri Division will research the possibility of facilitating the opportunity for EWGCOG staff member FMIS users to participate in future FMIS Focus Group webinars and training.

Recommendation #4: The EWGCOG staff members should utilize the various FMIS Training options made available on the FMIS website and participate in FMIS Focus Group webinars and training opportunities.

4.7 Public Participation

4.7.1 Statutory and Regulatory Basis

Sections 134(i)(5), 134(j)(1)(B) of Title 23 and Section 5303(i)(5) and 5303(j)(1)(B) of Title 49, require a Metropolitan Planning Organization (MPO) to provide adequate opportunity for the public to participate in and comment on the products and planning processes of the MPO. The requirements for public involvement are detailed in 23 CFR 450.316(a) and (b), which require the MPO to develop and use a documented participation plan that includes explicit procedures and strategies to include the public and other interested parties in the transportation planning process.

Specific requirements include giving adequate and timely notice of opportunities to participate in or comment on transportation issues and processes, employing visualization techniques to describe metropolitan transportation plans and TIPs, making public information readily available in electronically accessible formats and means such as the world wide web, holding public meetings at convenient and accessible locations and times, demonstrating explicit consideration and response to public input, and a periodically reviewing of the effectiveness of the participation plan.

4.7.2 Current Status:

The Public Involvement Plan (PIP) was updated and adopted in May of 2019. Included in the PIP are sections on “Who We Are” and “What We Do” that provide information on the responsibilities and functions of the MPO as well as the geographic area it serves. There is also a

section on ‘Your Voice Makes a Difference’ that describes the MPO’s efforts to obtain diverse perspectives in planning decisions by reaching out to those who are underserved and underrepresented such as the low-income, minority, elderly, and persons with disabilities.

The PIP establishes six core goals centered on reaching out to all populations in the metropolitan area and obtaining diverse opinions, incorporating public comments into the decision-making process, and evaluating the effectiveness of the public engagement activities. The PIP identifies objectives and strategies to achieve the established goals as well as a timeframe for achieving the strategies pertaining to each goal. The PIP also includes a map of the Environmental Justice and Limited English Proficiency (populations) census tracts located in the St. Louis region.

EWGCOG uses a wide range of approaches to public involvement. A few of the outreach approaches include: twitter and Facebook social media platforms, newsletter, the local newspaper, email, and online surveys. Prior to COVID-19, EWGCOG conducted open houses, public meetings, technical workshops, and community presentations.

EWGOG has developed specialized outreach strategies and used a combination of interactive tools such as narrated PowerPoint presentations and Survey Monkey to obtain public comments in the development of its’ long-range plan, called Connected 2045. It is worth noting that in 2017, EWGCOG launched a new website that is mobile friendly and that provides a more user-friendly experience and improved access to planning reports, meeting agendas, agency events, and project announcements. The EWGCOG’s plans, TIPs, and reports are placed on their website for public comment. The agency also regularly publishes content on its official Twitter and Facebook channels for continuous outreach and engagement.

4.7.3 Findings:

It is apparent that the EWGCOG is committed to public involvement involving all residents in the metropolitan area in the planning process. EWGCOG uses many approaches to inform the public and obtain public input on the metropolitan planning process. However, since March 2020 with the occurrence of COVID-19, EWGCOG has used virtual options for public meetings, open houses, Board and committee meetings. EWGOG also maintains an events calendar on its website to inform the public which has all the scheduled committee meetings, Board meetings, and open houses on various topics.

EWGCOG develops regular publications and other materials to inform and educate the region’s residents on various issues and to support citizen engagement. Geographic information systems (GIS) is also used to develop maps that inform the public and EWG produces a new map each month on different demographic trends that are made available on their website.

EWGOG has established a Public Involvement Plan Advisory Committee comprised of diverse representatives in the community to review and enhance EWGCOG’s approach to the region’s transportation planning and other activities. EWGCOG relied on the Advisory Committee for feedback on the implementation of *Connected2045* and guidance to ensure diverse populations

are included in outreach efforts. Notices of planning products are also provided to the other committee members for their comment.

EWGCOG has developed a tool called the “Activity Tracker” to record and monitor public involvement activities and events. This tool was enhanced to expand staff input options. EWGCOG reports that the Activity Tracker has enabled staff to document and assess the collection of public comments on the long-range plan, TIPs, specific projects in the region, and all public involvement activities.

Commendations #3: EWGCOG’s establishment of a goal, objectives, and a strategy framework for its’ public involvement plan with regular reviews on the progress on each goal.

Recommendations #5: The EWGCOG Public Involvement Plan (PIP) should better describe the opportunities and timeframes on how the public can be involved in the transportation planning process.

4.8 Civil Rights (Title VI, EJ, LEP, ADA)

4.8.1 Statutory and Regulatory Basis

Title VI of the Civil Rights Act of 1964, prohibits discrimination based upon race, color, and national origin. Specifically, 42 U.S.C. 2000d states that “No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.” In addition to Title VI, there are other Nondiscrimination statutes that afford legal protection. These statutes include the following: Section 162 (a) of the Federal-Aid Highway Act of 1973 (23 U.S.C. 324), Age Discrimination Act of 1975, and Section 504 of the Rehabilitation Act of 1973/Americans with Disabilities Act (ADA) of 1990. ADA specifies that programs and activities funded with Federal dollars are prohibited from discrimination based on disability.

Executive Order #12898 (Environmental Justice) directs federal agencies to develop strategies to address disproportionately high and adverse human health or environmental effects of their programs on minority and low-income populations. In compliance with this Executive Order, USDOT and FHWA issued orders to establish policies and procedures for addressing environmental justice in minority and low-income populations. The planning regulations, at 23 CFR 450.316(a)(1)(vii), require that the needs of those “traditionally underserved” by existing transportation systems, such as low-income and/or minority households, be sought out and considered.

Executive Order # 13166 (Limited-English-Proficiency) requires agencies to ensure that limited English proficiency persons are able to meaningfully access the services provided consistent with

and without unduly burdening the fundamental mission of each federal agency.

Title VI Plan

4.8.2 Current Status

EWGCOG is currently in the process of updating its Title VI Plan. The 2021 Draft update is currently posted on the EWG website and is open to receive comments from January 25, 2021-February 25, 2021.

EWGCOG analyzes the data of a given project area to determine how to cater to the needs of the project area's population. Project consultants use questionnaires during public engagement to gather demographic information of attendees and participants. This information is entered into a tracker system by the consultants.

EWGCOG has developed a demographic profile of the metropolitan planning area. The profile includes the following protected groups: elderly persons, LEP persons, low-income persons, the minority population, persons with disabilities, and zero-vehicle households (mobility needs). This information is documented in the Title VI Plan and used throughout EWGCOG's program areas and planning processes to inform the research conducted by the agency, the recommendations made to EWGCOG's Board of Directors (BOD), and EWGCOG's planning decisions.

The demographic data is reviewed every three years to determine if there have been any changes in the population that necessitate an adjustment to EWGCOG's strategies in order to provide meaningful access to agency programs and activities to any new or growing demographic groups.

The Americans with Disability Act of 1990 (ADA) specifies that programs and activities funded with federal financial dollars are prohibited from discrimination based on disability. At this moment, the Federal regulations do not assign the responsibility of ensuring project sponsors have ADA transition plans to the MPO's. Nevertheless, FHWA encourages MPO's to promote, provide education, and support the sponsors toward the goal of creating ADA Transition Plans.

4.8.3 Findings:

In 2017, it was recommended that EWGCOG work with MoDOT to increase outreach and education on the importance of ADA transition Plans. Additionally, project applications and plans should be reviewed to ensure that ADA requirements are included in cost estimates.

In response to the recommendation, EWGCOG added a question to project applications which asks the project sponsor if they have an ADA Transition Plan. If the answer is no, the sponsor is asked when they will have a plan. MoDOT ensures that all project plans include and meet ADA requirements. Additionally, EWGCOG's scoring criteria allocates performance points to active

transportation projects (requesting STP-S or TAP funding) that are identified in a locally developed plan, including ADA Transition Plans.

Commendation #4: The Title VI documents on EWGCOG’s public website are easily accessible to the public. The website includes detailed information on how to access the Title VI Plan, dates and times of the virtual Open House events, and the many ways to submit comments on the draft Title VI Plan. Additional documents that are easily accessible include the complaint procedures and the Limited English Proficiency Plan.

Environmental Justice

EWGCOG currently provides opportunities for meaningful public involvement in Environmental Justice (EJ) communities, and incorporates feedback into the larger planning process. Further, EWGCOG possesses spatial data that identifies the location of EJ populations.

4.8.4 Findings

In accordance with Executive Order 12898, DOT Order 5610.2(a), and FHWA Order 6640.23A, assessing the distribution of transportation resources, benefits, and services, within the St. Louis Metropolitan Planning Area (MPA) on a system-level, helps ensure there will be no disproportionately high and adverse human health and environmental effects. Despite EWGCOG possessing appropriate spatial data, no meaningful system-level analysis of the benefits and burdens is currently conducted by EWGCOG.

With spatial data of EJ areas already developed by the EWGCOG, this data can be used in a meaningful way to better understand and react to the distribution of system-level transportation investments to help prevent the denial of, reduction in, or significant delay in the receipt of benefits by minority or low-income populations. For example, EWGCOG could conduct financial and project-type analyses by identifying projects located within EJ areas and comparing them with projects in non-EJ areas. As such, it is vital that a system-level, comparative EJ analysis be incorporated into EWGCOG’s planning process, helping to ensure equity within the St. Louis MPA.

Recommendation #6: EWGCOG should develop and implement a process for completing system-level comparative analysis of the St. Louis region transportation system’s benefits and burdens, that compares minority/low-income populations to non-minority/low income populations. ONEDOT to provide technical assistance, training opportunities, and best practice resources.

4.9 Freight Planning

4.9.1 Statutory and Regulatory Basis

The MAP-21 established in 23 U.S.C. 167 a policy to improve the condition and performance of the national freight network and achieve goals related to economic competitiveness and efficiency; congestion; productivity; safety, security, and resilience of freight movement; infrastructure condition; use of advanced technology; performance, innovation, competition, and accountability, while reducing environmental impacts.

In addition, 23 U.S.C. 134 and 23 CFR 450.306 specifically identify the need to address freight movement as part of the metropolitan transportation planning process.

4.9.2 Current Status:

St. Louis Regional Freightway

The St. Louis Regional Freightway was founded in 2014. The St. Louis Regional Freightway is an all-purpose authority for freight operations and opportunities within the St. Louis region and is an enterprise of the Bi-State Development Agency. It is made up of a group of leaders comprised of multi-modal representatives, regional public and private leadership, governmental representatives and corporate leaders. Eight of the its Freight Council members represent the seven counties of the bi-state area along with the City of St. Louis. Three standing committees – marketing, policy, and freight development and needs analysis – support the Freightway’s activities.

EWGCOG has membership on the Freightway Council policy committee, and the freight development and needs analysis committee. Along with having a formal role on those bodies, EWGCOG works closely with St. Louis Freightway’s leadership to identify needs and develop problem-solving approaches and collaborates and coordinates with the Freightway Council on many freight and logistic planning efforts.

The St. Louis Regional Freightway has created a freight development project list which includes projects that are intended to help drive economic growth through freight infrastructure improvements and raise awareness and support for multimodal infrastructure funding. A list was endorsed by the EWGCOG’s Board of Directors in October 2016 and projects such as the I-270 bridge replacement over the Mississippi River and widening of I-270 in North St. Louis County are included in the investment plan of *Connected2045*.

The EWGCOG, IDOT, and MoDOT collaborate and cooperate with the St. Louis Regional Freightway annually to develop a list of regional freight priorities, which are then monitored and reported on by the Freightway. The EWGCOG collaborates and coordinates with the MoDOT and IDOT Freight Program Managers, to discuss the freight issues and priorities in St.

Louis region.

EWGCOG and the St. Louis Regional Freightway are beginning to focus more on “last mile” improvements. Aspect of this focus are the recently completed Non-Interstate Truck Corridor Study and the modification of STP criteria to include a freight specific category that is distinguished by its emphasis on serving specific industrial locations and intermodal facilities.

St. Louis Regional Freight Study

EWGCOG’s St. Louis Regional Freight Study was completed in June 2013. There are no immediate plans to conduct an updated Freight Study. In 2020, St. Louis Regional Freightway Council in cooperation with EWGCOG, completed a Non-Interstate Truck Corridor Study. EWGCOG is anticipating initiating rail crossing and rail operations studies in the upcoming year or two. In addition, IDOT is contemplating developing district-level freight plans.

Integration of Movement of Goods into St. Louis Metropolitan Planning Process

The EWGCOG is represented on Missouri and Illinois state freight committees and has been involved in data sharing and in topics such as the designation of Critical Urban Freight Corridors. The collaboration is limited to specific issues and activities.

“Connected 2045”, EWGCOG’s current Long-Range Transportation Plan (LRP), is built upon ten guiding principles. “Strengthen Intermodal Connections” is one of those ten principles and, as such, is an integral part of the LRP. It includes a set of strategies to improve intermodal freight movement in the St. Louis Region.

The LRTP also includes freight performance measures that that are tracked by the EWGCOG’s staff. The EWGCOG houses the majority of the St. Louis regions GIS inventory on freight related items. The St. Louis Regional Freightway maintains this data on a live web-mapping tool located on their website: <http://www.thefreightway.com/regional-freightway-map/>

The MoDOT is currently working to complete the update their Statewide Freight and Rail Plan. The EWGCOG is an active member of the Missouri Freight and Rail Plan Steering Committee, attending meetings and providing input when appropriate. EWGCOG will also be available to assist in related meetings and work as needed.

Freight Data Development

The EWGCOG uses the Freight Analysis Framework (FAF) tool for a variety of purposes: to monitor changes in high-level commodity flows and modal usage; to comparatively evaluate regional freight activity against other metropolitan areas; to compare model-estimated truck flows to FAF observed data; and to examine forecasts of future freight activity

The EWGCOG uses HERE data and Regional Integrated Transportation Information System

(RITIS) analytics to develop their annual Regional Congestion Report rather than National Performance Management Research Data Set (NPMRDS) data, based on their determination that HERE and RITIS provides more accurate travel time data than NPMRDS, resulting in congestion data that is more realistic.

Statewide Freight Advisory Committee Framework

MoDOT's is currently working to formulate a new and enhanced Freight Advisory Committee framework that will afford for a greater level of collaboration and coordination between the MoDOT and Missouri MPOs. The framework includes the creation of a new Statewide Freight Advisory Committee and Regional Freight Advisory Committees. The St. Louis Regional Freightway Council currently acts as the St. Louis Regional Freight Advisory Committee.

Federal-aid Project Development and Selection Process

The EWGCOG's TIP evaluation process includes a component on goods movement. The STP-S project evaluation utilizes six evaluation areas based on the Ten Guiding Principles in *Connected2045*. One of the evaluation areas is goods movement, which includes the analysis of the number of shippers and receivers in a corridor, the percentage of commercial truck volume for roadway or bridge project and whether a project provides some specific benefit for freight movement (e.g., increase load limit on bridge, turning radius improvements, direct connections to freight intermodal centers). A recent update to STP-S criteria, calls for additional emphasis to be placed on freight projects including ensuring reliable truck travel times, strengthen multimodal connections to the 23 key industrial site areas, and relationship to the National Highway Freight Network.

4.9.3 Findings:

The EWGCOG metropolitan transportation planning process continues to reflect the very successful integration of the consideration of freight movement at all transportation investment planning and project programming points. This effort serves as a foundation for the goal to make the St. Louis region a premier freight center in the Midwest through job and economic growth.

Commendation #5: EWGCOG's ongoing effort to champion the integration of freight movement into the overall St. Louis metropolitan planning process, including the project prioritization and selection for programming.

Commendation #6: The EWGCOG, MoDOT and the St. Louis Regional Freightway's partnering effort to formulate the St. Louis regional element of the Missouri Statewide Freight Advisory Committee framework.

4.10 Transportation Safety and Security

Transportation Safety Planning

4.10.1 Statutory and Regulatory Basis

23 U.S.C. 134(h)(1)(B) requires MPOs to consider safety as one of the federal planning factors. As stated in 23 CFR 450.306(a)(2), the planning process needs to consider and implement projects, strategies, and services that will increase the safety of the transportation system for motorized and non-motorized users.

In addition, SAFETEA-LU established a core safety program called the Highway Safety Improvement Program (HSIP) (23 U.S.C. 148), which introduced a mandate for states to have Strategic Highway Safety Plans (SHSPs). 23 CFR 450.306 (d) requires the metropolitan transportation planning process should be consistent with the SHSP, and other transit safety and security planning.

4.10.2 Current Status

The EWGCOG continues to be engaged with the Missouri Coalition for Roadway Safety (MCRS) is a partnership of Missouri safety advocates, including law enforcement agencies, health care providers, courts, local, state and federal government agencies, advocacy groups, planning organizations, concerned citizens and others. The MPO is not as involved with the safety efforts of the Illinois Department of Transportation.

The performance management framework of the Connected 2045 long range transportation plan for the St. Louis Region includes the effort to “Promote Safety and Security” as 1 of 10 guiding principles. System measures include rate of fatalities and rate of serious injuries that mirror the MAP-21 national goals. With the goal of providing safer transportation system for all users, the EWGCOG is committed to tracking progress on transportation safety to ensure that investments in the transportation system reduce both traffic fatalities and serious injuries in absolute terms, as well as the measure for crash rate decrease over time. For the competitive STBG program, extra points are awarded when safety is adequately addressed.

As part of the Federal Highway Administration safety performance requirements, all MPO’s are required to adopt or set safety targets to address fatalities and serious injuries in their respective urbanized areas. After deliberation, the EWGCOG adopted the Illinois Department of Transportation target of a 2% reduction annually under the safety targets.

The *Connected2045*, includes the following strategies to support the safety and security performance goals.

- Continue efforts with partners to help develop strategic highway safety

plans for each county in the region and publicize key findings.

- Incorporate safety issues identified in state and local strategic highway safety plans into the planning process.
- Support projects that focus on pedestrian safety in the region.

The importance of integrating safety into the EWGCOG's planning process is reflected in the evaluation measures used to select projects for the MTP and the TIP, and in the thorough evaluation of safety issues in corridor and subarea studies. There was recognition that there is limited funding to address safety in the transportation planning and programming process.

4.10.3 Findings:

The EWGCOG satisfies the federal requirements related to transportation safety planning.

Recommendation #7: EWGCOG and the Illinois Department of Transportation should work together on development and implementation of the Strategic Highway Safety Plans efforts in St. Clair, Madison and Monroe Counties.

Recommendation #8: As a regional leader, the EWGCOG should consider establishing a Regional Safety Committee with MPO members and other safety advocates to advance safety issues in the Region.

Security Planning

4.10.4 Statutory and Regulatory Basis

23 U.S.C. 134(h)(1)(C) requires MPOs to consider security as one of federal planning factors. As stated in 23 CFR 450.306(a)(3), the Metropolitan Transportation Planning process provides for consideration of security of the transportation system.

The regulations state that the degree and consideration of security should be based on the scale and complexity of many different local issues. Under 23 CFR 450.324(h), the MTP should include emergency relief and disaster preparedness plans and strategies and policies that support homeland security, as appropriate.

4.10.5 Current Status

The St Louis area FTA Chapter 5307 designated recipient complies with the requirement to spend at a minimum 1% of 5307 funds on safety and security projects within the region. As the designated recipient, Bi-State Metro is charged with ensuring regional cooperation and fulfilling the required spending threshold.

The EWGCOG continues to perform the lead role in defining security planning for the St. Louis

region through the various modes including roadway, transit, enhancements, greenways, etc. Safety and security are one of the five factors identified as key measures of the state of the region's transportation system performance.

The performance management framework of the *Connected2045*, includes the following strategies to support the security performance goals:

- Continue to work with partners to integrate complete streets planning that focuses on engineering, education, enforcement and emergency response.
- Support training of emergency officials for traffic and transit incident management.
- Utilize the results of the STARRS All Ready Preparedness Project's survey to ensure populations with functional and/or access needs are prepared for a major disaster.
- Strengthen regional security initiatives which create a region-wide communications system that supports daily emergency response and a massive response initiative for major disasters.

The EWGCOG has been involved in the recent Metro Security planning study and the implementation of the objectives from the study. The EWGCOG routinely informs the Executive Advisory Committee and the Board of Directors of the progress in meeting the security study recommendations.

The St. Louis Area Regional Response System ("STARRS"), developed by the EWGCOG, is a regional organization established to coordinate planning and response for large-scale critical incidents in the bi-state St. Louis metropolitan region. STARRS mission statement is to help local governments, businesses and citizens plan for, protect against, and recover from critical incidents in the St. Louis region. The mission of the STARRS system has moved from purchasing needed equipment to more training in recent years.

STARRS has a formal and cooperative relationship with the governmental agencies throughout the region. The EWGCOG's serves as the STARRS fiscal agent and the two entities operate under an executed memorandum of understanding (MOU). More information regarding STARRS can be accessed at: <http://www.stl-starrs.org/>

4.10.6 Findings: The EWGCOG satisfies the federal requirements related to security planning.

Commendation #7: EWGCOG's efforts in coordination and communication with the standing committees regarding the Metro Security study objectives.

4.11 Non-motorized Planning/Livability

4.11.1 Statutory and Regulatory Basis

23 U.S.C. 217(g) states that bicyclists and pedestrians shall be given due consideration in the comprehensive transportation plans developed by each MPO under 23 U.S.C. 134. Bicycle transportation facilities and pedestrian walkways shall be considered, where appropriate, in conjunction with all new construction and reconstruction of transportation facilities.

23 CFR 450.306 sets forth the requirement that the scope of the metropolitan planning process "will increase the safety for motorized and non-motorized users; increase the security of the transportation system for motorized and non-motorized users; and protect and enhance the environment, promote energy conservation, improve the quality of life.

4.11.2 Current Status:

Bicycle and Pedestrian Planning

EWGCOG committee structure integrates multimodal participation on both the Transportation Advisory Committee and the Bicycle and Pedestrian Committee. Bicycle and pedestrian improvements are incorporated throughout the St. Louis area. While many MoDOT and locally sponsored road projects include multimodal improvements, most bicycle and pedestrian spending is programmed through MPO sub-allocated programming such as the STP, TAP and CMAQ.

EWGCOG has a Bicycle and Pedestrian Advisory Committee that meets quarterly to discuss bicycle and pedestrian projects and issues in the St. Louis region. The EWGCOG Board has also endorsed the Gateway Bike Plan, a long-term vision for a connected system of on road bicycle routes between communities, transit, greenways, and trail. The Gateway Bike Plan Working Group, a subcommittee to the MPO's Bicycle and Pedestrian Advisory Committee, advises on all matters related to the implementation of the Gateway Bike Plan. The Gateway Bike Plan can be viewed at: <http://greatriversgreenway.org/about-us/projects-in-partnership/gateway-bike-plan/>

In 2018, EWGCOG developed a Bicycle Planning Guide for local agencies to use as a starting point for planning for bicycle facilities and incorporate low-stress facilities into their roadway projects. The planning guide aggregates information and best practices from various sources including the Federal Highway Administration, American Association of State and Transportation Officials, and National Association of City Transportation Officials. That same year EWGCOG also released a Bicycle and Pedestrian Crash Analysis. This analysis provides information on all reported bicycle and pedestrian crashes in the region. It also includes maps, charts, graphs, strategies to prevent such crashes, funding sources, and other resources for

local agencies. EWGCOG staff were also involved in planning initiatives at the city and county level such as the Downtown Multimodal Study and the St. Louis County Bicycle and Pedestrian Action Plan. In addition to the previously mentioned endeavors, EWGCOG has also hosted many popular workshops related to bicycle and pedestrian planning. Some workshops of note include: 1) FHWA Bikeway Selection Guide Virtual Workshop in July 2020 2) Safe Transportation for Every Pedestrian (STEP) Workshops in March 2019 and March 2020 3) NACTO Bicycle Planning Workshop in May 2019 4) Bikeable and Walkable Communities Workshop in June 2018.

Livability and Sustainability Planning

Through the ongoing OneSTL collaboration, created previously through a HUD grant to develop a regional plan for sustainable development, monthly “Sustainability Lab” sessions are held and regular working group meetings in the areas of Water and Green Infrastructure, Materials and Recycling, Transit Oriented Development, Energy and Emissions, Biodiversity, and Food Access meet to facilitate regional partner coordination. EWGCOG’s participation brings transportation into discussions that would typically lack consideration for that area or lack easy access to the transportation planning process. For instance, working groups are looking at increasing tree canopy and green infrastructure into roadway right-of-way and another subcommittee is exploring integrating recycled materials into roadway projects. EWGCOG also has recently collaborated with local, regional, state, and federal partners to develop the Ecological Data Inventory as a valuable tool for regional partners to have access to urban land cover, areas of ecological significance, and wetland mapping information.

The EWGCOG Great Streets Initiative emphasizes the safe coexistence of all modes of travel, including vehicular, pedestrian, public transit and bicycling. Consideration of the effect of how street design choices affect the pedestrian experience and the abutting land uses is central to this initiative. The Great Streets Guide can be found at www.greatstreetsstlouis.net and the EWGCOG TIP project selection process encourages communities to incorporate the initiative’s principles into their proposed projects.

4.11.3 Findings:

The EWGCOG satisfies the federal requirements related to non-motorized planning/livability.

Commendation #8: EWGCOG’s outreach efforts in bicycle and pedestrian planning with their development of such tools as the Bicycle Planning Guide and the Bicycle and Pedestrian Crash Analysis as well as hosting various popular workshops for multimodal planning.

4.12 Air Quality

4.12.1 Statutory and Regulatory Basis:

The air quality provisions of the Clean Air Act (42 U.S.C. 7401) and the MPO provisions of Titles 23 and 49 require a planning process that integrates air quality and metropolitan transportation planning, such that transportation investments support clean air goals. Under 23 CFR 450.324(m), a conformity determination must be made on any updated or amended transportation plan in accordance with the Clean Air Act and the EPA transportation conformity regulations of 40 CFR Part 93. A conformity determination must also be made on any updated or amended TIP, per 23 CFR 450.326(a).

4.12.2 Current Status:

The St. Louis transportation management area (TMA) is classified as a non-attainment area for the 2015 eight-hour ozone National Ambient Air Quality Standards (NAAQS), effective August 3, 2018. The non-attainment area includes: in Missouri, St. Charles and St. Louis Counties, the City of St. Louis and Boles Township in Franklin County; and Madison and St. Clair Counties in Illinois. EPA redesignated Jersey County to maintenance for the 1997 ozone standard and found it to be in attainment for 2008 and 2015 ozone standards. An air quality conformity determination is only performed if a regionally significant project(s) is located within Jersey County, Illinois. There was no new regionally significant project in the most recent Mid-Year Conformity determination approved by the EWGCOG Board of Directors on 1/28/21.

A major objective of the EWGCOG transportation planning process is to ensure that the projects and policies set out in the TIP and related amendments to the MTP help to reduce and minimize air quality impacts of transportation projects in accordance with federal, state, and local air quality standards, regulations, and priorities. The EWGCOG MTP and TIP need to conform to the purpose of air quality State Implementation Plans, which set out benchmarks against which progress is measured in meeting national goals for cleaner and healthier air. To accomplish the conformity determination, the EWGCOG compares a series of computer modeling exercises that calculate vehicle emissions from the proposed St. Louis transportation system and compares them to motor vehicle emissions levels set by Illinois and Missouri. The process is performed with input from the EWGCOG's Air Quality Advisory Committee (AQAC) and the Inter-Agency Consultation Group (IACG).

The transportation conformity finding relates to those precursor pollutants produced by automobiles and other on-road transportation, generally described as "mobile source emissions." The pollutant of most concern in this region is ozone and its precursors, oxides of nitrogen (NOx) and volatile organic compounds (VOCs).

Regional Consultation Process

The St. Louis region has an established consultation process that consists of regularly scheduled meetings of the AQAC and the IACG. The AQAC represents a broad range of environmental interests ranging from all levels of government to advocacy groups. Through AQAC meetings, EWGCOG staff coordinates and facilitates air quality planning activities between Illinois and Missouri agencies and assists the states in preparing necessary revisions to the mobile source components of State Implementation Plans (SIP's). The IACG is comprised of EWGOG staff and federal and state transportation and air quality partners. One of the primary functions of the IACG is to coordinate planning assumptions and data collection between EWGCOG, the Missouri Department of Natural Resources (MoDNR), and the Illinois Environmental Protection Agency (IEPA). Other items considered by the IACG include MTP/TIP updates, planning assumptions for regional emissions analysis, agreement on the test to be performed as part of the Conformity process, emissions budgets and base year inventories, and review and comment of Conformity Determinations. All decisions by the IACG are reached through consensus. Starting in June 2020 the AQAC and IACG meetings have been conducted virtually on the GoToMeeting platform. It is anticipated that virtual meetings will continue.

The EWGCOG utilizes a "Conformity Determination Users Guide" that describes the steps involved in a Conformity Determination and the roles and responsibilities of IACG members. The Guide's Appendices include such items as: The Regionally Significant Project Screening Criteria; roles and responsibilities in SIP development and Conformity Determinations; Hot-Spot considerations for project sponsors; and a glossary of air quality and conformity terms.

In the 2017 Certification Review, there was discussion of the value of developing a transparent trigger for the IACG to complete their vetting for the consideration of project level "hot spot" analysis in connection with the environmental determination phase of project delivery for local public agency sponsored projects not included in the EWGCOG LTRP or TIP. Since the 2017 review, the EWGCOG developed a process that includes sharing the IACG's project level "hot-spot" analysis tool with local project sponsors at the time the project sponsor begins their project environmental determination work effort. This outreach effort is delivered in at the start of all project level environmental determinations that require FHWA approval as well as for programmatic environmental determination actions administered by the MoDOT.

4.12.3 Findings:

The EWGCOG's regional emissions analysis and transportation conformity process for the St. Louis metropolitan area is being conducted in accordance with applicable requirements of sections 176 (c) of the Clean Air Act, as amended (42 U.S.C 7506 (c) and 40 CFR Part 93. The conformity determination process provides adequate representation and input from all levels of state and local government and individual groups on the air quality and transportation needs of the metropolitan area and results in the support and development of transportation investments for the entire bi-state metropolitan area.

Congestion Mitigation Air Quality (CMAQ) Annual Report

Congestion Mitigation and Air Quality Improvement (CMAQ) Program FY2020 Annual Reports are due to FHWA HQ by March 1 of every year. These reports should reflect; 1) all projects administered by FHWA for which there were CMAQ obligations in the preceding fiscal year, and 2) all transfers to FTA or other Federal agencies during the fiscal year.

It is critically important that the MoDOT and IDOT submit the most complete and accurate annual report of CMAQ projects since data derived from these reports may be used in answering Congressional inquiries, budget justification, Program administration and validating the CMAQ Performance Measurement process. Completeness and accuracy of project information are the most important aspect of the entire report, especially in the areas of quantitative emissions estimates, project descriptions, and monetary expenditures.

The CMAQ Project Tracking System (PTS) is accessed through the User Profile and Access Control System (UPACS). The CMAQ PTS includes detailed "Help" pages to assist users in recording their project data.

In 2021 (2020 CMAQ Report), the FHWA emphasized the importance of targeted descriptive information on project types supported, emission reduction by project type, and overall program obligation. The FHWA asked State DOTs to focus their compilation and review efforts on reporting descriptive project-specific information and quantitative air quality benefits and to ensure that federal funding obligation amounts be recorded as accurately as possible.

The EWGCOG contributes to the development of the CMAQ Annual Report. The SDOT's provide EWGCOG an excel spreadsheet with listed CMAQ projects and requests that the EWGCOG enter emission reduction data and other project information. Upon receipt of the completed spreadsheet with EWGCOG entries, the SDOTs' enter the information into the PTS.

4.12.4 Findings:

CMAQ Program Annual Reports are due to FHWA HQ by March 1 of every year. The MoDOT completed the required FY2019 reporting on 5/6/20. The MoDOT Finance Division is responsible for completing the CMAQ Annual Reporting. This delay in completing the 2019 CMAQ Annual Report was attributed to MoDOT staffing changes.

The absence of a MoDOT formalized written process for completing the CMAQ Annual Reporting and the minimal involvement of the MoDOT Planning Division staff members' in the CMAQ Annual Reporting process, was compounded by staffing changes within the MoDOT Finance Division. It has also been noted by EWGCOG staff, that the EWGCOG and MoDOT collaborative work effort could be improved if a designated EWGCOG staff member were able to enter project data directly into the CMAQ PTS.

The review team informed the EWGCOG that the FHWA has designated a staff member with project “enter, approve and delete rights” in the CMAQ PTS.

It is not uncommon for MPO’s across the country to enter project information directly into the CMAQ PTS.

Recommendation #9: MoDOT should take steps to formulate written process and procedures for completing the CMAQ Annual Report. Consideration should be given to implementing a process that involves the EWGCOG in entering project data directly into the CMAQ Project Tracking System (PTS).

FHWA provide CMAQ Annual Report training, as needed, to EWGCOG and MoDOT.

Status of Awarded CMAQ Funds Not Expended at the Time of Project Completion

In December 2019, the FHWA Missouri Division reviewed the requirements pertaining to the allowable use of unexpended (surplus) CMAQ funds awarded for a specific project, at the time of the project’s completion. The scope of this review included transferred and non-transferred CMAQ funding.

It was determined that neither Title 23 or Title 49, gives the project sponsor the authority to retain the unexpended (surplus) funds for use on a different project, even if the different project scope of work is eligible for CMAQ funding. This would violate the statutorily (23 USC 145) required project selection process for all Federal-aid highway projects assigned to the State or the State DOT.

The FHWA CMAQ program in Missouri is overseen by the MoDOT and with specific permission delivered by the EWGCOG. The EWGCOG on occasion asks for CMAQ funds to be transferred to FTA for application to selected transit project applications under specific Federal-aid transfer rules, 23 USC 126. The formal transfer request along with a detailed project description and timeline are submitted to the FHWA Division by MoDOT. This transfer process has worked well and allows FTA Region VII to administer the actions to authorize the work and obligate and monitor the funding.

It is expected that when CMAQ funds are transferred to FTA, per FHWA Order 4551.1, any unexpended (surplus) funds and obligation authority need to be returned to FHWA and the MoDOT.

The return of unexpended (surplus) CMAQ project funds, in the case of both non-transferred and transferred scenarios, ensures that the unexpended CMAQ funds may be made available to St. Louis region project sponsors as part of the EWGCOG’s competitive CMAQ project development and selection process.

4.12.5 Findings:

At the time of the December 2019 review, the following observations were noted:

- The MoDOT federal funding transfer process did not include the disclosure, to the receiving Federal agency (i.e. FTA), of the requirement for unexpended federal funds and obligation authority to be returned to FHWA and the MoDOT at the time of the awarded project's completion.
- The EWGCOG did not have a formalized policy that outlines the need for transferred, but unexpended (surplus) FHWA CMAQ funds, to be returned to FHWA and MoDOT at the time of the awarded project's completion.

Recommendations #10: MoDOT federal funding transfer process include the identification of the requirement, at the close of the project, for unexpended (surplus) federal funds and thus obligation authority be returned to FHWA and the MoDOT.

Recommendation #11: EWGCOG develop a formalized policy that outlines the need for transferred, but unexpended (surplus) CMAQ funds, to be returned to MoDOT at the time of the awarded project's completion.

4.13 Congestion Management Process / Management and Operations

4.13.1 Statutory and Regulatory Basis

23 U.S.C. 134(k)(3) and 23 CFR 450.322 set forth requirements for the congestion management process (CMP) in TMAs. The CMP is a systematic approach for managing congestion through a process that provides for a safe and effective integrated management and operation of the multimodal transportation system. TMAs designated as non-attainment for ozone must also provide an analysis of the need for additional capacity for a proposed improvement over travel demand reduction, and operational management strategies.

23 CFR 450.324(f)(5) requires the MTP include Management and Operations (M&O) of the transportation network as an integrated, multimodal approach to optimize the performance of the existing transportation infrastructure. Effective M&O strategies include measurable regional operations goals and objectives and specific performance measures to optimize system performance.

4.13.2 Current Status

Congestion Management Process (CMP)

EWGCOG's current CMP has enhanced communication and coordination between member

Agencies in the Region. EWGCOG created a standing Congestion Management and Operations Committee (CMOC) and the Technical Action Committee (CAC). Regular bi-monthly meetings of the committees are held which have led to better understanding of the status of maintenance and operations for the various stakeholders, provides for ongoing discussions between regional multi-modal transportation systems.

Working through the CMOC, a Regional Intelligent Transportation System (ITS) Data Sharing Initiative project was supported by MoDOT and St. Charles County which will provide standardizations of data and video exchange. This group was also engaged in the update of the Regional ITS Architecture Strategic Deployment Plan. Applicants for ITS projects must complete an ITS Architecture Consistency Statement.

Assessment and documentation includes an annual CMP report on regional congestion, mitigation efforts and evaluation results.

The CMP has increased regional awareness of the benefits of management and operations (M & O) in managing the transportation system and increased emphasis on projects that improve management and operations in the region. EWGCOG's staff has worked with regional partners to ensure that potential congestion management projects are analyzed correctly using the appropriate traffic analysis tools. This has helped to create better relationships between the EWGCOG and the member agencies.

The CMP has been used extensively in the development and obtaining competitive funding of projects such as ITS expansion and upgrades, traffic signal system upgrades, and optimization of coordinated traffic signal system corridors.

Intelligent Transportation Systems (ITS) Architecture

The St. Louis Regional ITS Architecture defines the system components, key functions, organizations involved in developing architecture, and the type of information to be shared between organizations and between parts of the system. The Regional ITS Architecture focuses on the application and implementation of communications technology in addressing congestion and transportation incident obstacles in a technologically coordinated way. One of the goals of the ITS Architecture Program is the coordination among stakeholders and jurisdictions and is recognized as a regional partnership between MoDOT, IDOT, EWGCOG and the Metro.

Traffic Management Centers (TMC) are the principal ITS architecture framework that have been established and implemented with great success in the St Louis region by both MoDOT and IDOT. On the Missouri side of the region, the TMC is part of the Gateway Guide framework, which serves as a one-stop shop for addressing travel needs and choices.

The EWGCOG is currently in the process of updating the Regional ITS Architecture for the Region. The primary area to be updated is the ITS Strategic Deployment Plan projects. The

Illinois Department of Transportation has updated the Statewide ITS Architecture and St. Charles County recently updated the County ITS plan.

4.13.3 Findings

Commendation #9: The EWGCOG's ongoing efforts to utilize the Congestion Management and Operations Committee (CMOC) and Technical Action Committee (TAC) to share information, providing assistance for member agencies and encouraging ITS investment in the region and seeking funding for ITS projects.

Recommendation #12: The EWGCOG should continue to encourage the members to develop ITS Strategic Deployment plans.

5.0 CONCLUSION

Certification Action:

The Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) Certification Review, conducted in FY 2021, found that the metropolitan transportation planning process being implemented in the St. Louis urbanized area meets Federal planning requirements. The EWGCOG is found to conduct planning activities in a continuing, cooperative, and comprehensive manner in coordination with its regional partners, as well as fulfilling the federally required multi-modal and participatory planning process.

Based on this review and ongoing oversight by the FHWA and the FTA, the transportation planning process carried out in the St Louis, Missouri Transportation Management Area for the period April 12, 2021 to April 11, 2025 is certified as meeting the requirements as described in 23 CFR Part 450 and 49 CFR Part 613.

APPENDIX A - PARTICIPANTS

The following individuals were involved in the St Louis urbanized area virtual on-site review:

First Name	Last Name	Agency
Staci	Alvarez	EWGCOG
Victor	Austin	Federal Transit Administration-HQ
Cheryl	Ball	MoDOT
Raegan	Ball	FHWA- Missouri Division
Kevin	Barbeau	Loop Trolley
Jerry	Blair	EWGCOG
Tom	Caldwell	IDOT
John	Donovan	FHWA-Illinois Division
Zachary	Evans	MoDOT
Jessica	Gershman	Bi-State Metro
Larry	Grither	EWGCOG
Mike	Henderson	MoDOT
Paul	Hubbman	EWGCOG
Kevin	Jemison	IDOT
Tom	Kelso	IDOT
Jason	Lange	EWGCOG
Mary Grace	Lewandowski	EWGCOG
April	McLean-McCoy	Federal Transit Administration-HQ
Brad	McMahon	FHWA- Missouri Division
Marcie	Meystrik	EWGCOG
John	Miller	Madison County
Steven	Minor	FHWA- Missouri Division
Cathy	Monroe	Federal Transit Administration Region VII
SJ	Morrison	Madison County Transit
Anna	Musial	EWGCOG
Lauren	Paulwell	FHWA- Missouri Division
Rachael	Pawlak	EWGCOG
John	Posey	EWGCOG
Dawn	Perkins	FHWA- Missouri Division
Taylor	Peters	FHWA- Missouri Division
Amir	Poorfakhraei	EWGCOG
Joni	Roeseler	MoDOT
Roz	Rodgers	EWGCOG
Lubna	Shoaib	EWGCOG
Chris	Schmidt	IDOT
Ken	Sharkey	St. Clair County Transit District

Eva	Steinman	Federal Transit Administration Region VII
Wesley	Stephen	MoDOT
JD	Stevenson	FHWA-Illinois Division
Melissa	Theiss	EWGCOG
Shaun	Tooley	MoDOT
Betsy	Tracy	FHWA-Illinois Division
Jim	Wild	EWGCOG- (Executive Director)

APPENDIX B - STATUS OF FINDINGS FROM THE FY 2017 REVIEW

One of the priorities of each certification review is assessing how well the planning partners in the area have addressed corrective actions and recommendations from the previous certification review. This section identifies the recommendations from the previous certification and summarizes discussions of how they have been addressed.

No.	Recommendation	Implementing Agency	Disposition
1	The EWGCOG include the Board of Directors and Governor approval dates on the current MPA map and making the enhanced map available for viewing on the EWGCOG website.	EWGCOG	Implemented
2	The EWGCOG and MoDOT modify the current cooperative functional reclassification process in a manner that allows for earlier involvement of the MoDOT Central Office and the FHWA Missouri Division	EWGCOG	Not Implemented Discussions were held between MoDOT St. Louis District office, MoDOT Central office (CO), EWGCOG and FHWA Missouri Division representative to discuss different options that would improve the current functional classification modification process. Concluded that current process is the most efficient.
3	Review current agreements (MOU/MOA's) for the FAST ACT, Performance Measures compliance and coordination in developing the Annual Listing of Obligated Projects (ALOP) and establish periodic review of these agreements.	EWGCOG	Implemented
4	Recommend member jurisdictions have more input on UPWP development and planning studies. FHWA and FTA recommend the EWGCOG have a process that allows more local transportation studies to be considered for programming into the UPWP	EWG, Local Partners	Not Implemented EWG recognizes the use of their PL funds as an agency prerogative. They determined that the use of available PL funds for local transportation studies, (with some exceptions, such as our Great Streets Initiative) would limit their larger regional efforts.
5	EWGCOG should develop a more robust multimodal program of projects for the long range MTP and include an education component for member jurisdictions.	EWGCOG	Implemented At the time of the 2017 review, the MTP contains transit projects listed primarily as illustrative projects and corridor studies due to the limited amount of transit funding available. The fiscally constrained element of the current Connected 2045

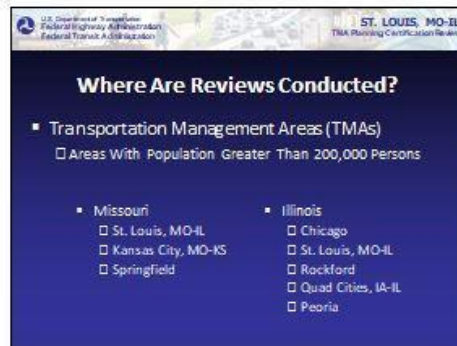
			<p>L RTP includes Transit Operation projects in all three horizon period time bands presented in the Investment Priorities tables (Pgs. 38-41).</p> <p>Connected 2045 L RTP can be viewed at: https://www.ewgateway.org/wp-content/uploads/2019/08/Connected2045-FinalDraft-082819.pdf</p>
6	When concurrently updating the TIP and MTP EWGCOG should update the project list in the MTP.	EWGCOG	<p>Not Implemented</p> <p>EWGCOG produces a printed copy of the MTP once, after it has been approved by the Board of Directors. Annual adoption of the TIP and any TIP amendments, modify the MTP. Amendments to the TIP (and, by extension the MTP) are documented in EWG's TIP database which can generate an updated project list if necessary.</p>
7	The EWGCOG educate LPA's about the necessary steps for documenting the demonstration of fiscal constraint required for locally sponsored regionally significant projects, including those from non-Federal funding sources that should be included in the EWGCOG's L RTP.	EWGCOG	<p>Implemented</p> <p>As part of its project solicitation process, EWGCOG explains to LPAs their documentation of fiscal constraint requirements. EWGCOG believes that this solicitation takes place far enough in advance so as to allow them to provide any guidance or technical assistance that may be required by the LPA.</p>
8	The IDOT work together with the EWGCOG to formulate and implement an enhanced collaboration and coordination process that ensures the EWGCOG's involvement in the IDOT's development and selection of projects located within the MPA for inclusion in the IDOT's STIP	IDOT, EWGCOG	<p>Not Implemented</p> <p>Little if any change has occurred since the 2017 review. EWGCOG continues to desire to have greater involvement in IDOT's development and selection of projects within the MPA.</p>
9	At the time of the next TIP update, the EWGCOG take steps to complete the following work efforts to enhance the clarity of the documented demonstration of fiscal constraint	EWGCOG	<p>Implemented</p> <p>The EWGCOG FY2021-2024 TIP can be viewed at: https://www.ewgateway.org/wp-content/uploads/2020/09/FY2021-2024-TIP-BoardApproved-082620.pdf</p>
9A	Rename the "Transportation Programs Sub-allocated to St. Louis Metro Sub-allocated Federal Funding Table"	EWGCOG	Implemented

	presented in the current EWG TIP (Pg. 39), to clarify its application and modify to separately show the carryover balance (previously allocated but not programmed) amount.		
9B	Show the total anticipated federal revenue in the revenue line item in the Financial Capacity by Funding Category – FHWA (in thousands) -Missouri Table (Pg. 40).	EWGCOG	Implemented
9C	Modifying the Financial Capacity by Funding Category – FHWA (in thousands)-Missouri Table (Pg. 40) to only show the anticipated MoDOT funding as MoDOT (Federal) and MoDOT (State) as an alternative to the various federal and state categories.	EWGCOG, MoDOT	Not Implemented EWGCOG and MoDOT completed a collaborative work effort to assess the effectiveness and efficiency of the current method of showing anticipated MoDOT Federal and state funding. it was determined this modification could not be implemented
9D	Modify the Budgeted Local Revenue versus Budgeted Outlays Table (F-3 to F- 8) in the manner that calculates an LPA's financial capacity for funding new TIP commitments that are processed in TIP modification actions completed throughout the program year.	EWGCOG	Implemented
9E	Modify the "Budgeted Local Revenue versus Budgeted Outlays" table (F-3 to F-8), to show LPA total O&M cost for locally owned federal-aid system lane miles.	EWGCOG	Implemented
10	The EWGCOG and local transit agencies work together to implement the following practices when documenting the demonstration of fiscal constraint in connection with programmed transit projects:	EWGCOG,BI-State	Implemented The EWGCOG FY2021-2024 TIP can be viewed at: https://www.ewgateway.org/wp-content/uploads/2020/09/FY2021-2024-TIP-BoardApproved-082620.pdf
10A	Show all anticipated federal revenue for each TIP horizon year, which is available for funding transit projects	EWGCOG,BI-State	Implemented
10B	The programming of all federal revenue that is shown as being available to fund transit in each year of the TIP horizon period.	EWGCOG,BI-State	Implemented
11	The EWGCOG take steps to educate the LPA project sponsors regarding the O&M cost estimates as part of their LPA	EWGCOG	Implemented

	workshops delivered in connection with the next TIP update cycle.		
12	<p>The EWGOG's take the following steps to enhance the effectiveness of their TIP modification policy</p> <p>The EWGCOG and MoDOT work together to develop and implement a TIP modification process that ensures that the EWG is made aware of the description of added scope and added cost to LPA projects and when there is added cost for federally participating work currently described in the TIP.</p>	EWGCOG, MoDOT	<p>Implemented</p> <p>EWGCOG and MoDOT worked together to establish an improved TIP modification process.</p>

APPENDIX C – PUBLIC COMMENTS

A virtual open house was held on January 21st, 2021 from 5pm to 7pm using GoTo Meeting and a teleconference line. Notice of the meeting was advertised in the local newspaper and on the EWGCOG's webpage for a week prior to the open house. An informational presentation about the certification review was given during the open house and available on the EWGCOG until the close of the site visit on January 28, 2021. No comments were received by the MPO or FHWA/FTA regarding the review. The federal team also presented at the Executive Advisory Committee meeting on January 19th, 2021 and at the EWGCOG Board of Directors meeting on January 27th, 2021. No comments were received at either meeting. The following slides were presented by the federal review team at each meeting:



U.S. Department of Transportation
Federal Highway Administration
Federal Transit Administration

ST. LOUIS, MO-IL
TMA Planning Certification Review

Planning Regulations

- Organization
- Boundaries
- Agreements
- Continuing, Coordinated, Comprehensive (3C) Process
- Unified Planning Work Program (UPWP)
- Fiscal Constraint
- Public Participation
- Congestion Management Process (CMP)
- Regional Transportation Plan
- Management and Operations
- Environmental Consultation and Mitigation
- Performance Based Planning and Management
- Transportation Improvement Program (TIP)

U.S. Department of Transportation
Federal Highway Administration
Federal Transit Administration

ST. LOUIS, MO-IL
TMA Planning Certification Review

Federal Planning Emphasis (Factors)

- Safety for all Motorized and Non-Motorized Users
- Economic Vitality including Global Competitiveness
- Homeland Security and Personal Security
- Accessibility and Mobility of Users and Freight
- Resiliency and reliability of transportation system
- Environment, Energy Conservation, and Quality of Life
- Connectivity Across and Between Modes
- Efficient System Management and Operation
- Preservation of Existing System
- Enhance travel and tourism

U.S. Department of Transportation
Federal Highway Administration
Federal Transit Administration

ST. LOUIS, MO-IL
TMA Planning Certification Review

Phases of the Review

- Ongoing Oversight
- Federal Actions Taken
- Desk Review
 - Review of Planning Products
 - Questionnaire
- Public Participation (Virtual Meeting)
- Site Visit (Virtual Meetings)
- Final Review Report with Federal Findings

U.S. Department of Transportation
Federal Highway Administration
Federal Transit Administration

ST. LOUIS, MO-IL
TMA Planning Certification Review

Potential Outcomes

- Full Certification
 - Recommendations for Future Improvement
 - Commendations for Progress or Best Practices
- Conditional Certification
 - Resolution of Corrective Action(s)
- Partial Certification
 - i.e. ITS Architecture Incomplete
- De-Certification

U.S. Department of Transportation
Federal Highway Administration
Federal Transit Administration

ST. LOUIS, MO-IL
TMA Planning Certification Review

2021 Review Schedule

- Thursday (1/21) – Staff Interviews, Public Meeting
- Tuesday (1/26) – Staff Interviews
- Thursday (1/28) – Staff Interviews
- Friday (1/29) – Closeout Meeting
- Mid February – Preliminary Draft Report Circulated
- Early March – Release of Final Report
- April – Presentation to EWG Board of Directors

Public Comment Period until 1/28

- Leave Comments in the chat box of this meeting –or–
- Email the federal team your comments before Thursday 1/28

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APPENDIX D - LIST OF ACRONYMS

ADA: Americans with Disabilities Act
AMPO: Association of Metropolitan Planning Organizations
CAA: Clean Air Act
CFR: Code of Federal Regulations
CMP: Congestion Management Process
CO: Carbon Monoxide
DOT: Department of Transportation
EJ: Environmental Justice
EWGCOG: East West Gateway Council of Governments
FAST: Fixing America's Surface Transportation Act
FHWA: Federal Highway Administration
FTA: Federal Transit Administration
FY: Fiscal Year
HSIP: Highway Safety Improvement Program
HUD: Housing and Urban Development
IDOT: Illinois Department of Transportation
ISTEA: Intermodal Surface Transportation Efficiency Act (ISTEA)
ITS: Intelligent Transportation Systems
LEP: Limited-English-Proficiency
LPA: Local Public Agency
M&O: Management and Operations
MAP-21: Moving Ahead for Progress in the 21st Century
MPA: Metropolitan Planning Area
MPO: Metropolitan Planning Organization
MoDOT: Missouri Department of Transportation
MOU: Memorandum of Understanding
MTP: Metropolitan Transportation Plan **NAAQS:** National Ambient Air Quality Standards
NO₂: Nitrogen Dioxide
O₃: Ozone
PIP: Public Involvement Plan
PM₁₀ and PM_{2.5}: Particulate Matter
SAFETEA-LU: Safe, Accountable, Flexible, Efficient Transportation Equity Act
SDOT: State Department of Transportation
SHSP: Strategic Highway Safety Plan
STARRS: St. Louis Area Regional Response System
STIP: State Transportation Improvement Program
TDM: Travel Demand Management
TIP: Transportation Improvement Program
TMA: Transportation Management Area **U.S.C.:** United States Code
UPWP: Unified Planning Work Program
USDOT: United States Department of Transportation
VOCs: Volatile Organic Compounds

APPENDIX E – VIRTUAL ON SITE MEETINGS DOCUMENTATION

FY 2021 FHWA/FTA CERTIFICATION REVIEW ST. LOUIS METROPOLITAN AREA PLANNING PROCESS ON SITE (VIRTUAL) REVIEW PLAN JANUARY 21-29, 2021

THURSDAY, JANUARY 21, 2021 (AFTERNOON)

12:30 -12:45 pm - Introductions/Virtual Meeting Overview

12:45 – 1:15 pm - Organization & Administration of the Planning Process

1:15 - 2:15 pm - Planning Program Process/Work Products

2:15 - 2:30 – Break Time

2:30 - 3:30 pm – Transit Planning and Ridership

PUBLIC INVOLVEMENT SEGMENT (VIRTUAL)

Start Time: 5:00 pm

End Time: 7:00 pm

TUESDAY, JANUARY 26, 2021 (MORNING)

9:00 – 9:30 - Continuation of Planning Program Process/Work Products

9:30 – 10:00 am - Public Involvement

10:00 – 10:45 am - Civil Rights/Environmental Justice (EJ)/American Disabilities Act (ADA)

10:45 – 11:00 am – Break Time

11:00 – 11:30 am - Freight Planning

11:30 – 12:00 am - Transportation Systems Management / Congestion Management Process (CMP)

THURSDAY, JANUARY 28, 2021 (AFTERNOON)

12:00 - 12:30 pm - AQ & Conformity Determination Process

1:00 – 1:30 pm - Bicycle/Pedestrian Planning

1:30 – 1:45 pm – Break Time

1:45 - 2:15 pm – Safety / Security Planning

2:15 -- 2:45 pm – MISC.

2:30 – 3:00 pm – Wrap up

FRIDAY, JANUARY 29, 2021 (MORNING)

10:00 – 11:00 pm – Closeout Meeting with EWGCOG Executive Director and Staff