

Reading Area Transportation Study

(610) 478-6300
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c/o Berks County Planning Commission
Berks County Services Center
633 Court Street, 14th Floor
Reading, PA 19601-4309

July 18, 2022

Mr. Larry Shifflet
Deputy Secretary for Planning
Pennsylvania Department of Transportation
400 North Street 8th Floor
Harrisburg, PA 17120

Attn: David Alas

Re: Reading MPO
FFY 2023- 2026
Transportation Improvement Program

Dear Mr. Shifflet:

By action at its meeting on July 14, 2022, the Reading Area Transportation Study Coordinating Committee (Reading MPO) approved the **FFY 2023-2026 Transportation Improvement Program (TIP)** as well as the **FFY 2023-2045 Long Range Transportation Plan (LRTP)**. Also approved at this meeting were the associated **Air Quality Conformity Analysis Report** and the **Environmental Justice Summary** covering both the **Transportation Improvement Program** and the **Long Range Transportation Plan**. These are being submitted for Department review and approval and forwarding to the appropriate state and federal agencies.

As requested for this submission, all required TIP documents, as well as the Long Range Transportation Plan, have been posted to the PennDOT SharePoint page **2023 Program Update**. Electronic copies will also be available on the Berks County Planning Commission web page: <https://www.co.berks.pa.us/Dept/Planning/Pages/Plans%20and%20Programs.aspx>

Included with this submission, as requested in the General and Procedural Guidance, please find the following materials:

- 1) Cover Letter
- 2) TIP Development / Project Selection Process Documentation
- 3) TIP Development Timeline
- 4) TPM (PM1, PM2, and PM3) Narrative Documentation
- 5) Transit Performance Measures Narrative Documentation
- 6) Highway and Bridge TIP Listing with Public Narrative
- 7) Public Transportation TIP Listing with Public Narrative

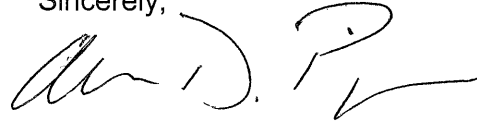
Mr. Larry Shifflet
Deputy Secretary for Planning
July 18, 2022
Page 2

- 8) Interstate TIP Listing with Public Narrative (Regional Portion)
- 9) TIP Financial Constraint Chart
- 10) Public Transportation Financial Capacity Analysis
- 11) EJ Analysis and Documentation
- 12) Air Quality Conformity Determination Report
- 13) Air Quality Conformity Resolution
- 14) Public Comment Period Advertisement
- 15) Documented Public Comments Received
- 16) Title VI Policy Statement
- 17) TIP Revision Procedures
- 18) Self-Certification Resolution
- 19) List of Major projects from Previous TIP that were Implemented
- 20) List of Major Regional Projects from the Previous TIP that were Delayed
- 21) TIP Checklist

Links to the individual elements are contained in the TIP document can be found in the Document Outline / Bookmarks icon on the top left under the "TIP Checklist:" item.

If you or your staff have any questions or require additional information, please contact me.

Sincerely,



Alan D. Piper
MPO Secretary
Transportation Planner III
Berks County Planning Commission

ADP/

Cc: Michael Rebert – PennDOT District 5-0 (via e-mail)
Jennifer Crobak – Federal Highway Administration (PA Div.) (via e-mail)
Chelsea Beytas – Federal Transit Administration (Region 3) (via e-mail)



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF TRANSPORTATION
HARRISBURG, PENNSYLVANIA 17120

August 17, 2022

Ms. Alicia Nolan, Division Administrator
U.S. Department of Transportation
Federal Highway Administration
228 Walnut Street, Room 508
Harrisburg, PA 17101-1720

Ms. Terry Garcia-Crews, Regional Administrator
U.S. Department of Transportation
Federal Transit Administration, Region III
1760 Market Street, Suite 500
Philadelphia, PA 19103-4124

Dear Ms. Nolan and Ms. Garcia-Crews:

On behalf of Pennsylvania's Metropolitan Planning Organizations (MPO) and the Rural Planning Organizations (RPO), I am transmitting the Federal Fiscal Year (FFY) 2023-2026 Statewide Transportation Improvement Program (STIP) for your review and approval. This will be a fully electronic submission of the STIP. All STIP documents are being submitted electronically utilizing the Pennsylvania Department of Transportation's (PennDOT) Planning [SharePoint](#) site. In accordance with 23 CFR 450.218(b), each regional Transportation Improvement Program (TIP) has been included in the STIP without any changes.

The process used to develop this information fully complies with all legislative and regulatory mandates regarding the development of TIPs and the STIP. The following information is being submitted electronically for all MPOs, RPOs, and Independent County:

- Highway and Transit Project Listings
- Air Quality Conformity Determinations and Resolutions for Non-attainment, Maintenance, and 1997 ozone National Ambient Air Quality Standards (NAAQs) "Orphan" areas
- Other Supporting Documentation (e.g., MPO Self-Certifications, TIP/STIP Modification Procedures, public involvement documentation including Environmental Justice activities, etc.)

Please be advised that PennDOT, on behalf of the Governor, approves all metropolitan (MPO) TIPs as required by Title 23 U.S.C. Section 135 (a) and (g) and Title 49 U.S.C. Section 5304 (a) and (g).

PennDOT and the RPOs have jointly developed the rural portions of the STIP, as part of the Commonwealth's transportation planning and programming process. Please be advised that PennDOT, on behalf of the Governor, also approves these rural portions of the STIP.

PennDOT, MPOs, and RPOs continue to comply with all planning and programming requirements including the consideration of the planning factors on the need to fiscally constrain all programs. The planning factors have been and will continue to be addressed in all long-range planning endeavors in Pennsylvania. Likewise, the FFY 2023 STIP and the individual TIPs satisfy all financial constraint requirements.

Two other documents are enclosed for your information as you review the STIP, which include:

- FFY 2023 STIP Executive Summary
- Statewide Self-Certification

The Executive Summary provides key information related to the process jointly established by PennDOT, MPOs/RPOs, and our federal partners for regional TIP and STIP development.

Included in this submission are Long-Range Transportation Plan (LRTP) updates for the Adams MPO, Erie MPO, North Central RPO, Reading Area Transportation Study, and the Shenango Valley Area Transportation Study. PennDOT requests your review and approval of the LRTP Air Quality conformity determination for these areas.

We are seeking your full approval of the FFY 2023 STIP. Your expeditious review and approval of the STIP by September 30, 2022, would be greatly appreciated. If you have any questions, please contact Mr. Larry S. Shifflet, Deputy Secretary for Planning, at 717.787.2744.

Sincerely,



Yassmin Gramian, P.E.
Secretary of Transportation

Enclosures

cc: Chris Trostle, PA Department of Environmental Protection

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<S:\Planning\2023 Program Update\Letter>

bcc: Melissa Batula, P.E., Acting Executive Deputy Secretary
Larry Shifflet, Deputy Secretary for Planning
Jennie Louwerse, AICP, Deputy Secretary for Multimodal Transportation
Michael Keiser, P.E., Acting Deputy Secretary for Highway Administration
Michelle Jennings, Acting Deputy Secretary for Administration
Jonathan Fleming, Chief Executive
Gavin Gray, Acting Chief Engineer
Brian Hare, P.E. Director, Center for Program Development and Management
Andrea Bahoric, Director, Bureau of Planning and Research
Danielle Spila, Director, Bureau of Public Transportation
Mark Tobin, Center for Program Development and Management
Mike Gismondi, Center for Program Development and Management
Jessica Clark, Center for Program Development and Management
Jackie Koons-Felion, Center for Program Development and Management
Mike Long, Bureau of Operations
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Matt Smoker, FHWA – PA Division
Kathleen Zubrzycki, FTA Region III
Laura Keeley, FTA Region III
Timothy Lidiak, FTA Region III
Susan Spielberger, United States Environmental Protection Agency
Gregory Beacoat, United States Environmental Protection Agency
Samantha Harmon, Department of Environmental Protection
Edna Weaver, Office of the Secretary
Karen Heath, Center for Program Development and Management
Madelyn Vergos, Office of Deputy Secretary for Planning



U.S. Department
of Transportation

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In Reply Refer To:
HPD-PA

Pennsylvania FFY 2023 -
2026 Statewide Transportation Improvement
Program & Air Quality Conformity Determinations

September 29, 2022

Ms. Yassmin Gramian, P.E.
Secretary of Transportation
Pennsylvania Department of Transportation
Commonwealth of Pennsylvania
Keystone Building
400 North St., Fifth Floor
Harrisburg, Pennsylvania

Dear Secretary Gramian:

The Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) have completed our joint review of the Pennsylvania Federal Fiscal Year (FFY) 2023-2026 Statewide Transportation Improvement Program (STIP) submitted with your letter dated August 17, 2022. Based on our review of the information provided, certifications of Statewide and Metropolitan transportation planning processes for and within the Commonwealth of Pennsylvania, and our participation in those transportation planning processes (including planning certification reviews conducted in Transportation Management Areas), we hereby take the following actions:

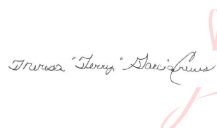
1. FHWA and FTA, in concurrence with the Environmental Protection Agency (EPA), have determined that the conformity determinations for the FFY 2023-2026 TIPs in all nonattainment and maintenance areas of the Commonwealth, adequately address and meet the requirements as specified in the Transportation Conformity Rule [40 CFR Part 93], as amended. This includes all ten (10) conformity determinations for areas that are currently designated under the existing National Ambient Air Quality Standards (NAAQS) and the nine (9) areas impacted by the U.S. Court of Appeals for the D.C. Eighth Circuit decision in *South Coast Air Quality Management District v. EPA* addressing conformity requirements for former 1997 ozone “orphan” regions. (Please see the enclosed table for the Pennsylvania regions requiring transportation conformity.) The air quality conformity determination approval for these regions will reset the 4-year conformity timeclock to begin on the date of this letter.
2. The FHWA and FTA approve the Pennsylvania FFY 2023-2026 STIP, which includes the individual Transportation Improvement Programs (TIPs) for all Metropolitan

Planning Organizations (MPOs), Rural Planning Organizations (RPOs), the Independent County (Wayne), the Statewide Items TIP, and the PennDOT Interstate Management Program.

3. The FHWA and FTA find that the projects contained in the STIP and MPO/RPO TIPs are based on transportation planning processes that meet the requirements of the Infrastructure Investment and Jobs Act (IIJA) (Pub. L. 117-58, also known as the “Bipartisan Infrastructure Law”); 23 U.S.C. Sections 134 and 135; 49 U.S.C. Sections 5303 and 5304; and 23 CFR part 450.
4. Based on our joint review of the overall Pennsylvania statewide, metropolitan, and rural transportation planning processes, the FHWA and FTA are issuing the FFY 2023-2026 STIP Federal Planning Finding, as enclosed.
5. In addition, several MPOs/RPOs have updated their Long Range Transportation Plan (LRTP) in accordance with 23 CFR Part 450.324. These areas include: Reading Area Transportation Study (RATS) MPO, Adams County MPO, Erie MPO, North Central RPO, and the Shenango Valley Transportation Study (SVTS) MPO. The Southwestern Pennsylvania Commission (SPC) has amended its LRTP. FHWA and FTA, in concurrence with EPA, have determined that the conformity determinations for the above mentioned LRTPs adequately address and meet the requirements as specified in the Transportation Conformity Rule [40 CFR Part 93], as amended. The air quality conformity determination approval for RATS MPO will reset the 4-year LRTP update timeclock to begin on the date of this letter. The Adams County MPO, Erie MPO, North Central RPO, and the SVTS MPO are designated as former 1997 ozone “orphan” region and as such retain 5-year LRTP update deadlines which were reset when the MPOs and RPO took action to adopt the various LRTP.

If you have any questions regarding this determination, please do not hesitate to contact either Jennifer Crobak, FHWA PA, at (717) 221-3440 or Laura Keeley, FTA Region III, at (215) 656-7111.

Sincerely,

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THERESA GARCIA
CREWS
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Terry Garcia Crews
Regional Administrator
FTA Region III

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NOLAN** Digitally signed by
ALICIA E NOLAN
Date: 2022.09.29
14:57:27 -04'00'

Alicia Nolan
Division Administrator
FHWA Pennsylvania Division

Enclosures

cc: Melissa Batula, P.E., Acting Executive Deputy Secretary
Larry Shifflet, Deputy Secretary for Planning
Andy Batson, AICP, Acting Deputy Secretary for Multimodal Transportation
Michael Keiser, P.E., Acting Deputy Secretary for Highway Administration
Michelle Jennings, Acting Deputy Secretary for Administration
Jon Fleming, Chief Executive
Gavin Gray, P.E., Acting Chief Engineer
Brian D. Hare, P.E. Director, Center for Program Development and Management
Andrea Bahoric, Director, Bureau of Planning and Research
Danielle Spila, Director, Bureau of Public Transportation
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Matt Smoker, FHWA HQ

Pennsylvania FFY 2023-2026 STIP Federal Planning Finding

This is the documented Federal Planning Finding (FPF) for the Pennsylvania FFY 2023-2026 Statewide Transportation Improvement Program (STIP) and all incorporated Transportation Improvement Programs (TIPs). This FPF is issued by the Federal Highway Administration (FHWA) Pennsylvania Division and the Federal Transit Administration (FTA) Region III for Statewide, Nonmetropolitan, and Metropolitan Transportation Planning and Programming Processes.

The FHWA and FTA find that the Pennsylvania FFY 2023-2026 STIP substantially meets the requirements of 23 United States Code (U.S.C.) 134, 135; 49 U.S.C. 5303-5305; 23 Code of Federal Regulations (CFR) part 450, and 49 CFR part 613.

The FPF includes **5 Commendations** where the Pennsylvania Department of Transportation (PennDOT) and Planning Partners have demonstrated excellence in the planning process and **5 Recommendations** for continued improvement. There are **no Corrective Actions**. Please see the Findings on page 3 for details.

FHWA and FTA are committed to assisting PennDOT and the Planning Partners to review and address the Recommendations identified in the FPF. FHWA and FTA request the opportunity to meet with PennDOT to discuss the FPF and develop an Action Plan to address the Recommendations within 90 days of the STIP approval.

What is the Federal Planning Finding (FPF)?

The FPF is a formal action taken by FHWA and FTA to evaluate and ensure that STIPs and TIPs are developed according to Statewide and metropolitan transportation planning processes consistent with 23 U.S.C. 134 and 135 and 49 U.S.C. 5303 and 5304 and 23 CFR part 450 and 500, and 49 CFR part 613.

The FPF is a formal opportunity to highlight what works well and opportunities for improvement in the Statewide or metropolitan transportation planning process.

The FPF applies to both PennDOT and Planning Partners.

The FPF is a required prerequisite to FHWA's and FTA's joint approval of the STIP.

What are the statutory and regulatory requirements for the FPF?

- The Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU, Pub. L. 109-59) contained statutory requirements, codified in Title 23 and Title 49, that the Secretary determine, at least every four years, whether the transportation planning process through which statewide transportation plans and programs are developed is consistent with 23 U.S.C. 134-135 and 49 U.S.C. 5303-5304.
- A FPF is required for the approval of a STIP (23 U.S.C. 135(g)(7) and 49 U.S.C. 5304(g)(7)).
- Moving Ahead for Progress in the 21st Century Act (MAP-21, Pub. L. 112-141), the Fixing America's Surface Transportation (FAST Act, Pub. L. 114-94), and the Infrastructure Investment and Jobs Act (IIJA) (Pub. L. 117-58, also known as the "Bipartisan Infrastructure Law") maintain this requirement.

Pennsylvania FFY 2023-2026 STIP Federal Planning Finding

- The FHWA and FTA adopted joint implementing regulations for these requirements, found in 23 CFR part 450. Pursuant to the regulations, the requirement for the FPF applies to both the STIP (23 CFR 400.220(b)) and TIPs (23 CFR 450.330(a)).

How are the findings identified and tracked?

FHWA and FTA work collaboratively to identify potential observations to include in the FPF. These observations are identified through each agency's involvement, stewardship and oversight activities with PennDOT, Metropolitan and Rural Planning Organizations (MPOs/RPOs), transit agencies, and key stakeholders. FHWA and FTA use several opportunities and methods to assess the quality of the Statewide and 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. In addition to the STIP/TIP review, this involvement includes the Unified Planning Work Program (UPWP) approval, the Long Range Transportation Plan (LRTP) coordination, Air Quality (AQ) conformity determinations (in nonattainment and maintenance areas), as well as a range of other activities.

There are three finding categories:

- 1) **Corrective Actions:** Items identified where the activity does not meet statutory and regulatory requirements. Each Corrective Action requires action by the State and/or MPOs and provides a date to complete the Corrective Action(s).
- 2) **Recommendations:** Items that meet the statutory and regulatory requirements, but may represent opportunities to improve the transportation planning processes. Recommendations could include enhancements to the planning processes, planning emphasis areas, emerging technologies, and agency initiatives.
- 3) **Commendations:** Activities or initiatives that demonstrate innovative, highly effective, well-thought out procedures for implementing the planning requirements or represent a national model for implementation and can be cited as an example for others.

Pennsylvania FFY 2023-2026 STIP Federal Planning Finding

Findings:

The following **Commendations** of the Statewide and metropolitan transportation planning processes have been identified:

1. **Transportation Funding Analysis:**

FHWA and FTA commend PennDOT for its comprehensive efforts to research, analyze and communicate the transportation funding challenges facing the Commonwealth of Pennsylvania. In 2021, PennDOT established the new Pathways program and launched an Alternative Funding Planning and Environmental Linkages (PEL) study to identify possible near-term and long-term solutions to transportation funding. Through the PEL, PennDOT consulted with FHWA and the Environmental Protection Agency (EPA) to establish a methodology for evaluating environmental justice effects associated with alternative funding strategies. PennDOT also played a key role as a technical advisor in the Transportation Revenue Options Commission (TROC) which was established in March 2021 through an Executive Order signed by Governor Tom Wolf. Through the PEL and TROC efforts, PennDOT has paved the way for the Commonwealth to explore and implement alternative funding solutions.

2. **STIP Public Involvement Strategy:**

FHWA and FTA commend PennDOT for successfully completing the FFY 2023-2026 STIP public comment period. In accordance with the Statewide Public Participation Plan (PPP), a STIP 15-day public comment period was held from June 15 through June 30, 2022. To supplement the regional TIPs' public outreach, PennDOT posted each regional TIP on the www.TalkPATransportation.com website. PennDOT also made the State Transportation Commission (STC) meetings more accessible by adding a virtual meeting link, agenda and materials to the website. FHWA and FTA commend PennDOT for these efforts to improve public involvement in the statewide transportation planning process.

3. **State Freight Work Group and State Freight Plan:**

FHWA and FTA commend PennDOT for expanding participation in the State Freight Work Group to include private sector stakeholders including the Pennsylvania Motor Truck Association (PMTA). In addition, FHWA and FTA recognize efforts are underway to update the State Freight Plan to be compliant with 49 U.S. Code § 70202 (§21104) and the new BIL freight provisions requirements. PennDOT's State Freight Plan update is due November 17, 2022.

4. **Pennsylvania's Efforts on the National Electric Vehicle Infrastructure (NEVI) Program:**

FHWA and FTA commend PennDOT's tremendous effort to develop Pennsylvania's first State Plan for Electric Vehicle Infrastructure Development (PennDOT NEVI Plan) under the new NEVI Formula Program. Throughout the planning process, PennDOT engaged the public and diverse stakeholders including advocacy organizations, government agencies, utility providers, airports and transit agencies, and labor and industry representatives. PennDOT also established EV Equity Guiding Principles to help guide implementation and make EVs more accessible for all Pennsylvanians. Pennsylvania's NEVI Plan was officially approved by FHWA on September 14, 2022.

Pennsylvania FFY 2023-2026 STIP Federal Planning Finding

5. Transit Asset Management (TAM) Outreach and Performance Targets:

FTA and FHWA commend the increase in coordination within PennDOT and with transit agencies, and the MPOs/RPOs regarding the Performance Based Planning and Programming (PBPP) requirements of the MPOs/RPOs as they relate to transit projects. The coordination within PennDOT led to the most inclusive TIP guidance document going to the MPOs/RPOs which provided significant assistance in making sure Transit based Performance Measures were accounted for in the TIPs.

The following **Recommendations** for the Statewide and metropolitan transportation planning processes have been identified:

1. Safety Planning, Programming and Project Delivery:

Improving safety is the top priority for FHWA, FTA and PennDOT. However, Pennsylvania has not met or made significant progress towards meeting the Safety Performance Measures (PM) under 23 CFR Part 490 for the last three reporting periods (CY2018, CY2019, and CY2020). To reduce fatalities and serious injuries, Pennsylvania needs to take a comprehensive approach to safety by proactively identifying safety projects, utilizing the full Highway Safety Improvement Program (HSIP) annual apportionment, and integrating safety appropriately into projects. There are three parts of this finding:

- a. PennDOT has established a robust data-driven safety planning process and policy, per *Publication 638*, to evaluate and program candidate projects for HSIP funding. However, FHWA found that numerous candidate projects programmed on the draft TIPs did not follow the PennDOT process for approvals or amendments in the PennDOT HSIP SharePoint site. PennDOT needs to ensure that they are following their process as defined in *Publication 638*. To address this issue, PennDOT should review and verify that all projects programmed with HSIP funds on the FFY 2023-2026 STIP have been evaluated for eligibility through the HSIP SharePoint Site. If there is a cost increase to the HSIP funding, the project should be amended in the HSIP SharePoint site and reevaluated for safety cost effectiveness per *Publication 638*. This verification must be completed prior to any HSIP obligations, above the originally approved amount, occurring on the project.
- b. Historically, PennDOT has obligated less than 80% of its full HSIP annual apportionment which diminishes Pennsylvania's capacity to deliver important safety projects.
- c. There has been a concerted effort to improve HSIP obligation rates over the last two years; however, there continues to be a rush to approve projects and to obligate funds in the last quarter of the federal fiscal year. In FFY21, approximately 75% of HSIP funds were obligated in the fourth quarter and in FFY22, approximately 50% of HSIP funds were obligated in the fourth quarter.

FHWA requests that PennDOT schedule regular coordination meetings to discuss these challenges and identify opportunities to improve safety planning, programming, and project delivery.

Pennsylvania FFY 2023-2026 STIP Federal Planning Finding

2. Integration of Transportation Performance Management (TPM):

FHWA and FTA recognize that PennDOT has long maintained a preservation-first focus and has made considerable progress in identifying investment needs and developing the Bridge and Pavement Asset Management Systems (BAMS/PAMS). However, it still appears that PennDOT's Asset Management Systems (AMS) are being used to backcheck project candidates rather than guiding investment priorities and driving project selection to achieve optimal performance. This finding is being carried over from the 2021 FPF.

Through the 2023 TIP development process, FHWA observed challenges to fully utilizing the BAMS/PAMS outputs including time constraints, competing project priorities, and technical training needs on how to use the data outputs in the planning process (TIP/TYP/LRTP). PennDOT's Transportation Asset Management Plan (TAMP) documentation continues to show the mix of project work types in the STIP are different than the Lowest Life Cycle Cost (LLCC) project work types recommended by the AMS. PennDOT did not evaluate the expected performance (PM2) of the draft STIP during the STIP development process. FHWA requests that PennDOT schedule coordination meetings to discuss strategies to better integrate TPM and PBPP into the planning process so that substantial progress can be achieved prior to the FFY 2025 STIP update.

As Pennsylvania makes progress on these initiatives, FHWA and FTA recommend that PennDOT, MPOs/RPOs, and transit agencies review and evaluate their planning agreements and internal procedural documents to ensure they are updated to incorporate new requirements and clearly define and document their roles and responsibilities for carrying out 23 U.S.C 134, 23 U.S.C 150, and 23 CFR 450 Subpart C requirements.

3. MPO/RPO LRTP Development Process:

Since the 2019 FPF, progress has been made in many areas to improve the LRTP update process and agency coordination; however, FHWA and FTA continue to observe issues with LRTPs which demonstrates the need for continued improvement. This finding is being carried over. FHWA and FTA recommend that MPOs/RPOs schedule a LRTP update coordination meeting at least 30 months in advance of the LRTP deadline. This coordination meeting should include FHWA, FTA, PennDOT Central Office and District Office staff, and other key partners. The meeting will serve the purpose of discussing roles and responsibilities, reviewing state and federal planning and transportation conformity requirements (where applicable), discussion on how to incorporate PBPP and TPM into the plan update, and identifying key milestones and resources. FHWA and FTA also recognize that PennDOT is in the process of finalizing the MPO/RPO LRTP Guidance Document. This document will be essential to provide technical assistance and tools to meet state and federal planning requirements.

4. MPO/RPO Compliance with FTA Title VI Requirements:

In early 2021, it was identified that not all Pennsylvania MPOs/RPOs had FTA compliant Title VI programs despite receiving FTA Planning funds through PennDOT's Consolidate Planning Grant (CPG). PennDOT has taken steps to inform the MPOs and RPOs of the requirements, and how to meet them, but as the primary recipient administering the CPG, PennDOT is ultimately responsible for the compliance status of their subrecipients. FTA and FHWA have participated in efforts to increase the awareness of the requirements among the MPOs/RPOs and encourage the

Pennsylvania FFY 2023-2026 STIP Federal Planning Finding

development of programs that meet these requirements, but it is clear from these coordination efforts there is still confusion among the planning partners what the requirements are and how to meet them.

FHWA and FTA recommend PennDOT undertake efforts to not only verify the status of the subrecipients of their CPG, but also undertake a proactive and guidance driven approach to supporting the efforts of their subrecipients to be in compliance with the Title VI requirements in accordance with FTA Circular 4702.1B.

5. Annual Listing of Obligated Projects for Transit:

All Planning Partners, transit agencies and PennDOT must cooperatively develop an Annual Listing of Obligated Projects for which Federal funds have been obligated in the previous year in accordance with 23 CFR 450.334. While overall, the MPOs/RPOs have made significant improvements in this effort since it was identified in the 2019 FPF, especially with Highway/Bridge projects, the inclusion of obligated transit projects has been inconsistent. As such, FTA and FHWA recommend PennDOT work with MPOs/RPOs and transit agencies to ensure this requirement is carried out on an annual basis for all federally funded Highway/Bridge and transit projects.

Pennsylvania Areas Requiring Transportation Conformity

Note: The table reflects the revocation of the 1997 PM_{2.5} NAAQS on October 24, 2016. The table includes the 1997 8-hour ozone NAAQS per the February 16, 2018 D.C Circuit decision in South Coast Air Quality Management District v. EPA (Case No. 15-1115). The impact of this court decision is only on areas that were maintenance or nonattainment of the 1997 ozone NAAQS at the time of revocation and are designated as attainment for the 2008 and 2015 ozone NAAQS. These areas are referred to as “orphan” maintenance areas.

MPO/RPO	Applicable NAAQS	Nonattainment / Maintenance Area Name	Counties in Area	Nonattainment Status
Reading	2008 8-hour Ozone	Reading, PA	Berks	Marginal
Allentown	2008 8-hour Ozone	Allentown-Bethlehem-Easton, PA	Lehigh, Northampton	Marginal
	2006 24-Hour PM _{2.5}	Allentown, PA	Lehigh, Northampton	Maintenance
Harrisburg	2006 24-Hour PM _{2.5}	Harrisburg-Lebanon-Carlisle-York, PA	Cumberland, Dauphin	Maintenance
	1997 8-hour Ozone	Harrisburg-Lebanon-Carlisle, PA	Cumberland, Dauphin, Perry	Orphan Maintenance
York	2006 24-Hour PM _{2.5}	Harrisburg-Lebanon-Carlisle-York, PA	York	Maintenance
	1997 8-hour Ozone	York, PA	York	Orphan Maintenance
Lancaster	2008 8-hour Ozone	Lancaster, PA	Lancaster	Marginal
	2006 24-Hour PM _{2.5}	Lancaster, PA	Lancaster	Maintenance
Lebanon	2012 Annual PM _{2.5}	Lebanon County, PA	Lebanon	Moderate
	2006 24-Hour PM _{2.5}	Harrisburg-Lebanon-Carlisle-York, PA	Lebanon	Maintenance
	1997 8-hour Ozone	Harrisburg-Lebanon-Carlisle, PA	Lebanon	Orphan Maintenance
Johnstown	1997 8-hour Ozone	Johnstown, PA	Cambria	Orphan Maintenance
	2006 24-Hour PM _{2.5}	Johnstown, PA	Cambria	Maintenance
NEPA	2008 8-hour Ozone	Allentown-Bethlehem-Easton, PA	Carbon	Marginal
	1997 8-hour Ozone	Scranton-Wilkes-Barre, PA	Monroe	Orphan Maintenance

MPO/RPO	Applicable NAAQS	Nonattainment / Maintenance Area Name	Counties in Area	Nonattainment Status
DVRPC	2015 8-hour Ozone	Philadelphia-Wilmington-Atlantic City, PA-NJ-MD-DE	Bucks, Chester, Delaware, Montgomery, Philadelphia	Marginal
	2012 Annual PM _{2.5}	Delaware County, PA	Delaware	Moderate
	2008 8-hour Ozone	Philadelphia-Wilmington-Atlantic City, PA-NJ-MD-DE	Bucks, Chester, Delaware, Montgomery, Philadelphia	Marginal
	2006 24-Hour PM _{2.5}	Philadelphia-Wilmington, PA-NJ-DE	Bucks, Chester, Delaware, Montgomery, Philadelphia	Maintenance
SPC	2012 Annual PM _{2.5}	Allegheny County, PA	Allegheny	Moderate
	2008 8-hour Ozone	Pittsburgh-Beaver Valley, PA	Allegheny, Armstrong, Beaver, Butler, Fayette, Washington, Westmoreland	Marginal
	2006 24-Hour PM _{2.5}	Pittsburgh-Beaver Valley, PA	Allegheny (P), Armstrong (P), Beaver, Butler, Greene (P), Lawrence (P), Washington, Westmoreland	Maintenance
	2006 24-Hour PM _{2.5}	Johnstown, PA	Indiana (P)	Maintenance
	2006 24-Hour PM _{2.5}	Liberty-Clairton, PA	Allegheny (P)	Moderate
	1997 8-hour Ozone	Clearfield and Indiana Cos, PA	Indiana	Orphan Maintenance
	1997 8-hour Ozone	Greene Co, PA	Greene	Orphan Maintenance
	1987 24-Hour PM ₁₀	Clairton & 4 Boroughs, PA	Allegheny (P)	Maintenance
	1971 CO	Pittsburgh, PA	Allegheny (P)	Limited Maintenance

MPO/RPO	Applicable NAAQS	Nonattainment / Maintenance Area Name	Counties in Area	Nonattainment Status
Altoona	1997 8-hour Ozone	Altoona, PA	Blair	Orphan Maintenance
North Central	1997 8-hour Ozone	Clearfield and Indiana Cos, PA	Clearfield	Orphan Maintenance
Erie	1997 8-hour Ozone	Erie, PA	Erie	Orphan Maintenance
Franklin	1997 8-hour Ozone	Franklin Co, PA	Franklin	Orphan Maintenance
Scranton	1997 8-hour Ozone	Scranton-Wilkes-Barre, PA	Lackawanna, Luzerne	Orphan Maintenance
Northern Tier	1997 8-hour Ozone	Scranton-Wilkes-Barre, PA	Wyoming	Orphan Maintenance
	1997 8-hour Ozone	Tioga Co, PA	Tioga	Orphan Maintenance
Centre	1997 8-hour Ozone	State College, PA	Centre	Orphan Maintenance
Adams	1997 8-hour Ozone	York, PA	Adams	Orphan Maintenance
Shenango Valley	1997 8-hour Ozone	Youngstown-Warren-Sharon, OH-PA	Mercer	Orphan Maintenance

(P) = designates partial county areas that are included in the nonattainment/maintenance area



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
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1600 John F. Kennedy Boulevard
Philadelphia, Pennsylvania 19103-2852

Ms. Camille Otto
Director of Program Development
Federal Highway Administration
Pennsylvania Division
228 Walnut Street, Room 508
Harrisburg, Pennsylvania 17101-1720

Via email at camille.otto@dot.gov

Dear Ms. Otto:

The U.S. Environmental Protection Agency (EPA) has reviewed the conformity determinations for the Fiscal Year (FY) 2023-2026 Statewide Transportation Improvement Program for 19 metropolitan planning organizations (MPOs) within the Commonwealth of Pennsylvania. In addition, EPA has reviewed updated Long Range Transportation Plans (LRTPs) for Reading Area Transportation Study MPO, Adams County MPO, Erie MPO, North Central MPO, and Shenango Valley Transportation Study MPO. EPA reviewed the air quality conformity analysis reports covering all air quality nonattainment and maintenance regions as well as the 1997 8-hour ozone national ambient air quality standards “orphan” regions. The nonattainment, maintenance, and orphan regions have documented their air quality conformity for the FY 2023-2026 Transportation Improvement Program through the horizon year of their LRTPs. Therefore, the required conformity actions are covered in the new FY 2023-2026 STIPs and the regional LRTPs.

EPA’s review of the conformity determinations indicates that the determinations meet the requirements of the Clean Air Act and the applicable regulations promulgated under 40 CFR part 93. Please find EPA’s detailed evaluations in the enclosed technical support documents.

Please feel free to call Mr. Michael Gordon, Chief, Planning & Implementation Branch, at (215) 814-2039 or Mr. Gregory Becoat, at (215) 814-2036 if you have any questions pertaining to this review.

Sincerely,

Cristina Fernández, Director
Air and Radiation Division

Enclosure

cc: Laura Keeley, FTA (via email at laura.keeley@dot.gov)
Jennifer Crobak, FHWA (via email at raris@baltometro.org)
Jacqueline Koons-Felion, PennDOT (via email at jfelion@pa.gov)