

Appendix F

Transmission, Approval, and Planning Findings Letters

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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

May 24, 2024

Ms. Kristin Mulkerin
Deputy Secretary for Planning
Pennsylvania Department of Transportation
400 North Street 8th Floor
Harrisburg, PA 17120

Attn: David Alas

Re: Reading MPO
FFY 2025- 2028
Transportation Improvement Program

Dear Ms. Mulkerin:

By action at its meeting on May 16, 2024, the Reading Area Transportation Study Coordinating Committee (Reading MPO) approved the **FFY 2025-2028 Transportation Improvement Program (TIP)**. 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, have been posted to the PennDOT SharePoint page **2025 Program Update**. Electronic copies will also be available on the Berks County Planning Commission web page:
<https://www.berkspa.gov/departments/planning-commission>

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) MPO Specific TIP Development Timeline
- 4) TPM (PM1, PM2, and PM3) Narrative Documentation
- 5) Transit Performance Measures Narrative Documentation
- 6) Transit Asset Management Program Narrative Documentation
- 7) Highway and Bridge TIP Listing with Public Narrative
- 8) Public Transportation TIP Listing with Public Narrative

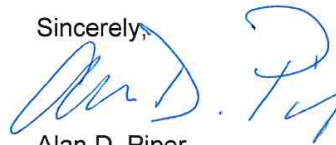
Ms. Kristin Mulkerin
Deputy Secretary for Planning
May 24, 2024
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- 9) Interstate TIP Listing with Public Narrative (Regional Portion)
- 10) Statewide TIP Listing (Regional Portion)
- 11) TIP Financial Constraint Chart
- 12) Public Transportation Financial Capacity Analysis
- 13) EJ Analysis and Documentation
- 14) Air Quality Conformity Determination Report
- 15) Air Quality Conformity Resolution
- 16) Public Comment Period Advertisement
- 17) Documentation of Public Comments Received
- 18) Title VI Policy Statement
- 19) MPO TIP Modification Procedures
- 20) Self-Certification Resolution
- 21) List of Regionally Important Projects from Previous TIP that were Implemented
- 22) List of Regionally Important Projects from the Previous TIP that were Delayed
- 23) Documentation of Regional System Level Estimates of State and Local Sources Beyond Financial Guidance
- 24) TIP Checklist

Links to the individual elements 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: Chris Kufro – PennDOT District 5-0 (via e-mail)
Gene Porochniak – Federal Highway Administration (PA Div.) (via e-mail)
Tim Lidiak – Federal Transit Administration (Region 3) (via e-mail)



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF TRANSPORTATION
HARRISBURG, PENNSYLVANIA 17120

August 14, 2024

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

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
theresa.garciacrews@dot.gov

Dear Ms. Nolan and Ms. Garcia-Crews:

On behalf of Pennsylvania's Metropolitan Planning Organizations (MPO) and Rural Planning Organizations (RPO), I am transmitting the Federal Fiscal Year (FFY) 2025-2028 Statewide Transportation Improvement Program (STIP) for your review and approval. This is a fully electronic submission of the STIP through 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.)

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).

Office of the Secretary
400 North Street | Harrisburg, PA 17120 | 717.787.5574 | www.penndot.pa.gov

Ms. Nolan and Ms. Garcia-Crews
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August 14, 2024

PennDOT and the RPOs have jointly developed the rural portions of the STIP, as part of the Commonwealth's transportation planning and programming process. 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. The FFY 2025-2028 STIP, the individual TIPs and all long-range planning efforts satisfy all financial constraint requirements.

Two other documents are included with this submission:

- FFY 2025-2028 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 TIP and STIP development.

Also, included in this submission are Long-Range Transportation Plan (LRTP) updates for the Cambria MPO and Lebanon MPO. 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 2025 STIP. Your expeditious review and approval of the STIP by September 30, 2024, would be greatly appreciated. If you have any questions, please contact Ms. Kristin Mulkerin at 717.783.2430.

Sincerely,



Michael B. Carroll
Secretary of Transportation

cc: Brian Trowbridge, PA Department of Environmental Protection

Ms. Nolan and Ms. Garcia-Crews
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August 14, 2024

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[S:\Planning\2025 Program Update\Letter](#)

bcc: Larry S. Shifflet, Executive Deputy Secretary for Transportation
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Meredith Biggica, Deputy Secretary for Multimodal Transportation
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September 27, 2024

Reply To:
HPD-PA

Mr. Michael Carroll
Secretary of Transportation
Pennsylvania Department of Transportation
Keystone Building
400 North St.
Harrisburg, Pennsylvania 17120

Re: Pennsylvania FFY 2025-2028 Statewide Transportation Improvement Program & Air Quality Conformity Determinations

Dear Secretary Carroll:

The Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) have completed our joint review of the Pennsylvania Federal Fiscal Year (FFY) 2025-2028 Statewide Transportation Improvement Program (STIP) submitted with your letter dated August 14, 2024. 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 2025-2028 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*, which addresses 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 2025-2028 STIP, which includes the individual Transportation Improvement Programs (TIPs) for all Metropolitan Planning Organizations (MPOs), Rural Planning Organizations (RPOs), the independent Wayne County, Statewide Items, and the 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 2025-2028 STIP Federal Planning Finding, as enclosed.
5. In addition, several MPOs/RPOs have updated their Long Range Transportation Plans (LRTPs) in accordance with 23 CFR Part 450.324. These areas include the Lebanon MPO, Lancaster MPO, and Cambria County MPO. The Delaware Valley Regional Planning Commission (DVRPC) MPO and the Southwestern Pennsylvania Commission (SPC) MPO have amended their LRTPs. 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 approvals for the Lebanon, Lancaster, and Cambria County MPOs will reset their respective 4-year LRTP update timeclocks to begin on the date of this letter.

If you have any questions regarding this determination, please do not hesitate to contact either Gene Porochniak, FHWA Pennsylvania Division, at eugene.porochniak@dot.gov or (717) 221-4438, or Laura Keeley, FTA Region III, at laura.keeley@dot.gov or (215) 656-7111.

Sincerely,

 Digitally signed by
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GARCIA CREWS
Date: 2024.09.27
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Terry Garcia Crews
Regional Administrator
FTA Region III

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NOLAN  Digitally signed by
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Alicia Nolan
Division Administrator
FHWA Pennsylvania Division

Enclosures

- cc: Larry Shifflet, Executive Deputy Secretary
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 Meredith Biggica, Deputy Secretary for Multimodal Transportation
 Chris Norris, P.E., Deputy Secretary for Highway Administration
 Corey Pellington, Deputy Secretary for Administration
 Robert Mulkerin, Special Advisor to the Executive Deputy Secretary
 Casey Markey, Special Assistant, Office of the Deputy Secretary for Planning
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Pennsylvania FFY 2025-2028 STIP Federal Planning Finding

This is the documented Federal Planning Finding (FPF) for the Pennsylvania FFY 2025-2028 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, metropolitan, and nonmetropolitan transportation planning and programming processes.

The FHWA and FTA find that the Pennsylvania FFY 2025-2028 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 **3 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 beginning 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 date.

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, metropolitan, and nonmetropolitan transportation planning processes consistent with 23 U.S.C. 134 and 135, 49 U.S.C. 5303 and 5304, 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, metropolitan, or nonmetropolitan transportation planning process.

The FPF applies to both PennDOT and the 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.
- The Moving Ahead for Progress in the 21st Century Act (MAP-21, Pub. L. 112-141), the Fixing America's Surface Transportation Act (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" or BIL) maintain this requirement.
- 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)].

Pennsylvania FFY 2025-2028 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, Long Range Transportation Plan (LRTP) coordination, and 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 the FPF 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 one or more elements of the transportation planning process. Recommendations could include enhancements to planning processes, planning emphasis areas, emerging technologies, and agency initiatives.
- 3) **Commendations:** Activities or initiatives that demonstrate innovative, highly effective, and well thought out procedures for implementing the planning requirements or represent a national model for implementation that can be cited as a good practice example for others.

Pennsylvania FFY 2025-2028 STIP Federal Planning Finding

Findings:

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

1. BIL Implementation

FHWA and FTA commend PennDOT and the Planning Partners on their efforts to support implementation of the BIL/IIJA new formula funding programs and discretionary grant opportunities. Notable achievements include:

- PennDOT has completed three rounds of National Electric Vehicle Infrastructure (NEVI) project awards, has 91 active projects as of August 15, 2024, and has successfully completed their first operational charging stations.
- PennDOT has updated their Design Manual (DM2) to incorporate a chapter on resilience and is currently working on developing a Resilience Improvement Plan (RIP).
- PennDOT's cooperative development of their State Carbon Reduction Strategy (CRS) with input from the Planning Partners, their creation of an eligibility resource guide for potential Carbon Reduction Program (CRP) projects, and their utilization of CRP funding for their Transportation Systems Management & Operations (TSMO) Funding Initiative program have been key elements in the implementation of the CRP in Pennsylvania.
- Regional efforts by the Planning Partners to educate the public and local officials on new formula funding programs, promote discretionary grant opportunities, establish new regional CRP project selection processes, and increase efforts to consider equity in planning.

PennDOT's IIJA website provides resources, current grant alerts, and a listing of projects that have received discretionary grant awards, which is a great resource for both the Planning Partners and other transportation stakeholders in Pennsylvania. PennDOT's assistance to local grant recipients has supported successful project delivery. Through these efforts, PennDOT has continued their focus on exploring and implementing funding solutions for the needs of the Commonwealth's transportation network.

Finally, FHWA and FTA commend PennDOT on their continued use of August redistribution as another tool to effectively deliver the transportation program in Pennsylvania. PennDOT has applied for additional annual obligation limitation on a consistent basis and has utilized the available obligation authority to the maximum extent possible. This is especially notable given the large increase in August redistribution levels in recent years, which has presented a challenge for PennDOT to obligate larger amounts in a short period of time.

2. Planning and Environmental Linkages Process

FHWA and FTA would like to commend PennDOT on their effective use of the Planning and Environment Linkages (PEL) process to improve project development and lead to better decision-making. PEL studies have been particularly valuable for the US 219-Section 050 and State College Area Connector projects, which the project teams have been able to utilize to initiate Environmental Impact Statements (EISs). A PEL is also in-process for the particularly complex

Pennsylvania FFY 2025-2028 STIP Federal Planning Finding

Skidders Falls Bridge project. The use of PELs demonstrates PennDOT's commitment to early consideration of project Purpose and Needs, preliminary alternatives, potential impacts, and public and agency feedback to improve project delivery on large, complex projects, while also providing additional input to inform and improve the National Environmental Policy Act (NEPA) process.

3. Unified Planning Work Program

FHWA and FTA commend PennDOT and the Planning Partners on their ongoing efforts to improve UPWP invoice procedures and address the findings from the Tier 2 Invoicing Procedures and Internal Controls Review. PennDOT's development of internal procedures, external and internal handbooks, training, and a Management Plan has helped to roll out the new internal controls and invoicing process. FHWA looks forward to working with PennDOT to build on this progress and assist them with the completion of the initial testing of the invoice sampling plan.

FHWA and FTA also wish to recognize PennDOT's efforts to update the State Planning and Research (SPR) Memorandum of Understanding (MOU), which outlines procedures for the administration of the SPR Work Program in the Commonwealth of Pennsylvania, as well as PennDOT's coordination on updates to the UPWP Guidance following the administration of a 1-year Work Program to separate Pennsylvania's TIP and UPWP development cycles.

The following **Recommendations** for the Statewide, metropolitan, and nonmetropolitan 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 under 23 CFR Part 490 for the last five reporting periods [Calendar Year (CY) 2018 through CY 2022]. Historically, since Federal Fiscal Year (FFY) 2017, PennDOT has obligated on average less than 85% of their full Highway Safety Improvement Program (HSIP) annual apportionment, which diminishes Pennsylvania's capacity to deliver important safety projects. To reduce fatalities and serious injuries, PennDOT needs to take a comprehensive approach to safety by proactively identifying safety projects, utilizing the full HSIP annual apportionment, and integrating safety into projects. This finding is being carried over from the 2023 FPF.

FHWA and FTA recognize that there has been a concerted effort by PennDOT to improve the HSIP obligation process over the last few years, including achieving a larger percentage of obligation occurring earlier in the FFY and obligating more than the minimum required in FFY 2024. In addition, beginning in CY 2025, around April 15 each year PennDOT plans to move current fiscal year HSIP funding remaining in regional line items and not assigned to projects to the Statewide line item for redistribution to other projects that are ready to obligate. FHWA and FTA support this proactive approach to improve HSIP utilization rates. FHWA and FTA request that PennDOT continue to schedule regular coordination meetings and bring the Planning Partners into the conversation to discuss ongoing funding challenges and identify further opportunities to improve safety planning, programming, and project delivery.

Pennsylvania FFY 2025-2028 STIP Federal Planning Finding**2. Integration of Asset Management (AM) and 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 by developing and improving their Bridge and Pavement Asset Management Systems (AMS) and now beginning development on AssetFox. However, based on the Pennsylvania Transportation Asset Management Plan (TAMP) consistency determination, TIP submissions, and feedback, it still appears that PennDOT's AMS are not being widely used to guide investment priorities and drive project selection to achieve optimal performance. This finding is being carried over from the 2023 FPF.

Through the 2025 TIP development process, FHWA and FTA observed continuing challenges to PennDOT and the Planning Partners on fully utilizing the AMS outputs, including the timing of AMS outputs, competing project priorities, and technical training needs on how to effectively use the data outputs in the planning process. PennDOT did not evaluate the expected performance outcomes of the draft 2025 STIP during the STIP development process.

FHWA and FTA request that PennDOT work with the Planning Partners towards greater consistency between the TAMP, the STIP/Twelve-Year Program (TYP), and regional MPO/RPO LRTPs. To do this, PennDOT should continue holding monthly coordination meetings with FHWA, PennDOT AMS technical experts and the PennDOT Program Center. The purpose of these meetings should be to discuss asset management challenges, identify opportunities for improvement, and monitor progress in implementing the required changes needed for PennDOT to successfully integrate their AMS more fully into project selection.

3. LRTP Development Process

Since the 2019 FPF, progress has been made in many areas to improve the LRTP update process, including the development of PennDOT's updated Regional LRTP Guidance (Pub. 575). However, FHWA and FTA continue to observe issues with LRTP updates, including rushed development of plans, late agency coordination, a lack of awareness about air quality conformity requirements, limited review time for FHWA and FTA prior to plan public comment periods or plan adoptions, and potential for plan expirations. These continuing issues demonstrate there is still a need for further improvement and greater focus by the Planning Partners and PennDOT on the LRTP development process. This finding is being carried over from the 2023 FPF.

To address the issues outlined above, FHWA and FTA continue to emphasize the importance of the Planning Partner scheduling a LRTP kickoff meeting early in the update process. For LRTP updates, FHWA and FTA recommend that the Planning Partners work with PennDOT, FHWA, and FTA to jointly develop reasonable update schedules with key milestones identified. FHWA and FTA also recommend that PennDOT consider ways they can further promote the LRTP Guidance to increase awareness and use of this resource, such as webinars and the sharing of effective practices.

Pennsylvania FFY 2025-2028 STIP Federal Planning Finding**4. Metropolitan Planning Agreements (MOUs/MOAs)**

As required by 23 CFR 450.314, each Metropolitan Planning Area (MPA) must have a written agreement among the MPO, the State(s), and the providers of public transportation which identifies their mutual responsibilities in carrying out the metropolitan transportation planning process. In several recent Certification Reviews, FHWA and FTA have identified outdated agreements and missing requirements in the written provisions between PennDOT, the MPO, and the Transit provider(s), which have resulted in Corrective Actions. FHWA and FTA recommend that PennDOT, the Planning Partners, and the Transit agencies evaluate their Memorandums of Understanding/Memorandums of Agreement (MOUs/MOAs) as needed to ensure that the current documents include all required parties as signatories and identify the mutual responsibilities of all required parties in carrying out the metropolitan planning process in each region.

As part of fully meeting the requirements found in 23 CFR 450.314, planning agreements between PennDOT, the Planning Partner(s), and the Transit provider(s) must also include specific provisions for the development of financial plans that support the LRTP and TIP, the development of the annual listing of obligated projects for both highway/bridge and transit, and written provisions on meeting performance measure requirements (if not documented elsewhere). The Planning Partners, PennDOT, and the providers of public transportation should periodically review and update these agreements, as appropriate, to reflect and account for changes in transportation planning requirements.

5. Transit Coordination

FTA and FHWA recommend that PennDOT, the Planning Partners, and Transit providers identify ways to strengthen multimodal planning, communication, and collaboration. Stronger coordination between different stakeholders, inclusive of Public Transportation, is necessary to meet the federal planning requirements and PennDOT plays a crucial role in leading and modeling that across Pennsylvania.

PennDOT has undertaken large efforts to update planning guidance, like Pub. 575, but has often not fully incorporated FTA requirements in these documents. In addition, when comments have been provided by FTA or BPT, they have not been addressed. This has resulted in guidance documents and materials that are incomplete and missing information on federal requirements. Furthermore, during the review of the FY2025-2028 TIPs, FTA and FHWA identified several inconsistencies within the TIPs in how Transit projects are included, how fiscal constraint is demonstrated together with the transit financial capacity analysis, and how the projects meet performance-based planning and programming requirements.

FTA and FHWA recommend that PennDOT evaluate and develop internal procedures for how the Department will coordinate reviews between the Bureau of Public Transit (BPT) and the Center for Program Development & Management (CPDM-Program Center) when addressing federal planning requirements. In addition, PennDOT should take actions to clarify and strengthen procedures to ensure adequate transit coordination between PennDOT CPDM, BPT, Districts, and the Planning Partners.

Pennsylvania FFY 2025-2028 STIP Federal Planning Finding

Furthermore, Planning Partners and Transit providers should, with assistance from PennDOT, evaluate their procedures for addressing how transit activities are correctly recorded and reflected in the TIPs and STIP, LRTP System Performance Reports, UPWPs and other planning documents. The selection of projects for inclusion in the Annual Listing of Obligated Projects, UPWP amendments, the programming of transit planning projects with non-PL funds, and the inclusion of transit performance measures and reporting are all aspects that should be considered. To provide additional assistance to the Planning Partners, PennDOT may explore additional measures at their discretion, including supplementing General and Procedural Guidance and other guidance documents with FTA-specific details.

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	Maintenance
	2006 24-Hour PM _{2.5}	Harrisburg-Lebanon-Carlisle-York, PA	Lebanon	Maintenance
	1997 8-hour Ozone	Harrisburg-Lebanon-Carlisle, PA	Lebanon	Orphan Maintenance
Cambria County	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	Serious
	2012 Annual PM _{2.5}	Delaware County, PA	Delaware	Maintenance
	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

MPO/RPO	Applicable NAAQS	Nonattainment / Maintenance Area Name	Counties in Area	Nonattainment Status
Blair County	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

**REGION 3**

PHILADELPHIA, PA 19103

Ms. Alicia Nolan
Division Administrator
Federal Highway Administration
Pennsylvania Division
228 Walnut Street, Room 508
Harrisburg, Pennsylvania 17101-1720

Via email at alicia.nolan@dot.gov

Dear Ms. Nolan:

The U.S. Environmental Protection Agency (EPA) has reviewed the conformity determinations for the Fiscal Year (FY) 2025-2028 Statewide Transportation Improvement Program for 20 metropolitan planning organizations (MPOs) within the Commonwealth of Pennsylvania. In addition, EPA has reviewed updated Long Range Transportation Plans (LRTPs) for Lebanon MPO, Lancaster MPO, Cambria County MPO, Delaware Valley Regional Planning Commission MPO, and Southwestern Pennsylvania Commission 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 2025-2028 Transportation Improvement Program through the horizon year of their LRTPs. Therefore, the required conformity actions are covered in the new FY 2025-2028 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. David Talley, Acting Chief, Planning & Implementation Branch, at (215) 814-2117 or Mr. Gregory Becoat, at (215) 814-2036 if you have any questions pertaining this review.

Sincerely,

CRISTINA
FERNANDEZ

Cristina Fernández, Director
Air and Radiation Division

Digitally signed by CRISTINA
FERNANDEZ
Date: 2024.09.26 12:31:59 -04'00'

Enclosure

cc: Gene Porochniak, FHWA (via email at eugene.porochniak@dot.gov)
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