TRANSMISSION, APPROVAL, AND PLANNING FINDINGS LETTERS

READING AREA TRANSPORTATION STUDY
c/o Berks County Planning Commission
400 E. Wyomissing Ave., Box 2
Mohnton, PA 19540
Phone: 610.478.6300

June 30, 2026

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

Attn: Nyomi Nonnemaker

Re: Reading MPO
FFY 2027- 2030
Transportation Improvement Program
and
FFY 2027 – 2030 Long Range
Transportation Plan

Dear Ms. Mulkerin:

By action at its meeting on May 21, 2026 the Reading Area Transportation Study Coordinating Committee (Reading MPO) approved the **FFY 2027-2030 Transportation Improvement Program (TIP),** the **FFFY 2027-2050 Long Range Transportation Plan and the FFY 2027-2030 Transportation Improvement Program and FFY 2027-2050 Long Range Transportation Plan Appendix** . Also approved at this meeting were the associated **Air Quality Conformity Analysis Report** and the **Community Demographic Assessment** 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 **2027 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) RATS FFY 2027-2030 Transportation Improvement Program Submittal Document

3) TIP Development / Project Selection Process Documentation (1)
4) MPO Specific TIP Development Timeline (1)
5) TPM PM1 Narrative Documentation (1)
6) TPM PM2 Narrative Documentation (1)
7) TPM PM3 Narrative Documentation (1)
8) Transit Performance Measures Narrative Documentation (1)
9) Transit Asset Management Program Narrative Documentation (1)
10) Highway and Bridge TIP Listing with Public Narrative (1)
11) Public Transportation TIP Listing with Public Narrative (1)
12) Interstate TIP Listing with Public Narrative (Regional Portion) (1)
13) Statewide TIP Listing (Regional Portion) (1)
14) TIP Financial Constraint Chart (1)
15) Public Transportation Financial Capacity Analysis (1)
16) Air Quality Conformity Determination Report Summary (1)
17) Air Quality Conformity Resolution (1)
18) Public Comment Period Advertisement (2)
19) Documentation of Public Comments Received (2)
20) Title VI Policy Statement (2)
21) MPO TIP Modification Procedures (1)
22) Self-Certification Resolution (1)
23) List of Regionally Important Projects from Previous TIP that were Implemented (1)
24) List of Regionally Important Projects from the Previous TIP that were Delayed (1)
25) Documentation of Regional System Level Estimates of State and Local Sources Beyond Financial Guidance (1)

26) TIP Checklist
27) RATS Air Quality Conformity Determination Report
28) RATS Community Demographic Assessment
29) RATS FFY 2027-2050 Long Range Transportation Plan

Links to the individual elements contained in the TIP (1) or TIP /LRTP Appendix (2) documents can be found using the respective Bookmarks icon on the top right side of the cover page.

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)
Ronnique Bishop – 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 5, 2026

Clint Beck, P.E., Division Administrator
U.S. Department of Transportation
Federal Highway Administration
Pennsylvania Division
30 North Third Street, Suite 700
Harrisburg, PA 17101
clint.beck@dot.gov

Terry Garcia-Crews, Regional Administrator
U.S. Department of Transportation
Federal Transit Administration, Region III
1835 Market Street, Suite 1910
Philadelphia, PA 19103
theresa.garciacrews@dot.gov

Dear Clint Beck and Terry Garcia-Crews:

On behalf of the Commonwealth of Pennsylvania, I am transmitting the Federal Fiscal Year (FFY) 2027-2030 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 STIP and the process used for its development fully comply with all legislative and regulatory mandates. The submission includes the *FFY 2027-2030 STIP Executive Summary* that provides key information related to the process jointly established by PennDOT, MPOs/RPOs, and our federal partners, as well as documentation of planning and programming requirements, including the *Statewide Self-Certification*.

The following information is included in the submission for the Metropolitan Planning Organizations (MPOs), Rural Planning Organizations (RPOs), and Independent County:

- Fiscally Constrained 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, etc.)

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

PennDOT, on behalf of the Governor, approves all 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, on behalf of the Governor, also approves the STIP for all areas of the State.

This submission also includes one Long-Range Transportation Plan (LRTP) update (Reading MPO) and two LRTP amendments (Delaware Valley Regional Planning Commission MPO and Southwestern Pennsylvania Commission MPO). PennDOT requests your review and approval of the LRTP Air Quality conformity determination for these three areas and the two regions transmitted earlier this year (Altoona MPO and Lackawanna-Luzerne MPO).

We are requesting your expeditious review and are seeking full approval of the FFY 2027 STIP by September 30, 2026. If you have any questions, please contact Kristin Mulkerin at 717.783.2430.

Sincerely,



Michael B. Carroll
Secretary of Transportation

cc: FHWA Pennsylvania Division, Pennsylvania.FHWA@dot.gov
Brian Trowbridge, PA Department of Environmental Protection

bcc: Larry S. Shifflet, Executive Deputy Secretary Transportation
Kristin Mulkerin, Deputy Secretary for Planning
Meredith Biggica, Deputy Secretary for Multimodal Transportation
Christine Norris, P.E., Deputy Secretary for Highway Administration
Corey Pellington, Deputy Secretary for Administration
Kara Templeton, Deputy Secretary for Driver and Vehicle Services
Kelly Barber, P.E., Chief Engineer
Mark Tobin, Director, Center for Program Development and Management
Andrea Bahoric, Director, Bureau of Planning and Research
Danielle Spila, Director, Bureau of Public Transportation
Dan Farley, P.E., Director, Bureau of Operations
Brandon Leach, Center for Program Development and Management
Nathan Walker, Center for Program Development and Management
Jessica Clark, Center for Program Development and Management
Ray Green, Center for Program Development and Management
Halley Cole, Bureau of Operations
Doug Tomlinson, Bureau of Operations
Justin Bruner, Bureau of Operations
Steve Gault, Bureau of Operations
District Executives
Assistant District Executives
District Portfolio Managers
District Planning and Programming Managers
District Planners
MPO/RPO Executive Directors
MPO/RPO Assistant Directors/Planners
Harmony Etzweiler, FHWA – PA Division
Jennifer Crobak, FHWA – PA Division
Gene Porochniak, FHWA – PA Division
Ronnique Bishop, FHWA – PA Division
Laura Keeley, FTA Region III
Timothy Lidiak, FTA Region III
Melanie Haake, FTA Region III
Susan Spielberger, United States Environmental Protection Agency
Gregory Beacoat, United States Environmental Protection Agency
Mike Gordon, United States Environmental Protection Agency
Samantha Harmon, Department of Environmental Protection
Cassidy Snyder, Office of the Secretary
Lauryn Goshorn, Center for Program Development and Management
Maria Hernandez, Office of the Deputy Secretary for Planning

U.S. Department of Transportation

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Harrisburg, PA 17101-1720
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Pennsylvania.FHWA@dot.gov

Reply To:
HPD-PA

September 28, 2026

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

Re: Pennsylvania FFY 2027-2030 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) 2027-2030 Statewide Transportation Improvement Program (STIP) submitted with your letter dated August 5, 2026. 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. The FHWA and the FTA, in concurrence with the Environmental Protection Agency (EPA), have determined that the conformity determinations for the FFY 2027-2030 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. Circuit decision in the *South Coast Air Quality Management District v. EPA* case. This Court decision addresses conformity requirements for former 1997 ozone “orphan” regions (please see the enclosed table for the Pennsylvania planning regions requiring transportation conformity). The air quality conformity determination approval for these nineteen (19) regions will reset the 4-year conformity timeclock to begin on the date of this letter. EPA's technical support documents are available upon request.

2. The FHWA and the FTA hereby approve the Pennsylvania FFY 2027-2030 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 Program, and the Interstate Management Program.

3. The FHWA and the 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) (Public Law 117-58); 23 U.S.C. Sections 134 and 135; 49 U.S.C. Sections 5303 and 5304; and 23 CFR part 450.

4. Based on a joint review of the overall Pennsylvania statewide, metropolitan, and rural transportation planning processes, the FHWA and the FTA are issuing the FFY 2027-2030 STIP Federal Planning Finding (FPF), as enclosed. This formal finding includes commendations where the Pennsylvania Department of Transportation (PennDOT) and Planning Partners have demonstrated excellence in the planning process as well as recommendations which identify areas for further improvement.

5. In addition, several MPOs have updated their Metropolitan Transportation Plans, or Long-Range Transportation Plans (LRTPs), in accordance with 23 CFR Part 450.324. These areas include the Reading MPO, Altoona (Blair) MPO, and the Lackawanna-Luzerne MPO. In addition, the Delaware Valley Regional Planning Commission (DVRPC) MPO and the Southwestern Pennsylvania Commission (SPC) MPO have amended their LRTPs. The FHWA and the FTA, in concurrence with the 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 the Reading MPO will reset their 4-year LRTP update timeclock to begin on the date of this letter. The Altoona (Blair) and Lackawanna-Luzerne MPOs are designated as former 1997 ozone "orphan" regions and as such retain 5-year LRTP update deadlines, which were reset when the MPOs took action to adopt their respective LRTPs.

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 Tim Lidiak FTA Region III, at Timothy.Lidiak@dot.gov or (215) 656-7084.

Sincerely,

ANTHONY T. TARONE Digitally signed by ANTHONY T. TARONE Date: 2026.09.28 12:12:48 -04'00'

Anthony Tarone
Deputy Regional Administrator
FTA Region III

CLINT H BECK Digitally signed by CLINT H BECK Date: 2026.09.28 16:29:13 -04'00'

Clint Beck
Division Administrator
FHWA Pennsylvania Division

Enclosures:

Pennsylvania FFY 2027-2030 STIP Federal Planning Finding
EPA 2027-2030 STIP Conformity Determination Letter
PA NAAQS Conformity Status Table (ver 05-05-26)

ec: Larry Shifflet, Executive Deputy Secretary
Kristin Mulkerin, Deputy Secretary for Planning
Meredith Biggica, Deputy Secretary for Multimodal Transportation
Christine 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
Mark Tobin, Bureau Director, Center for Program Development & Management (CPDM)
Andrea Bahoric, Bureau Director, Bureau of Planning & Research (BPR)
Danielle Spila, Director, Bureau of Public Transportation
Dan Farley, Director, Bureau of Operations
Michael Bonini, P3 Bureau Director
Doug Tomlinson, Chief, Highway Safety and Traffic Operations (HSTO) Division
Thomas Glass, Highway Safety Section Chief
Steve Gault, Chief, TSMO Arterials & Planning Section
Gavin Gray, P.E., Chief Engineer
Justin Bruner, Chief, Bridge Asset Management
Halley Cole, Chief, Pavement Asset Management
Drew Ames, Chief, Environmental Planning and Development
Kelly Barber, Chief Engineer for Highway Administration
Megan Peterson, Director, Bureau of Workforce and Business Opportunity (BWBO)
Aleshia Amadi, PennDOT BWBO
Brian Wall, Research Division Manager
Nathan Walker, CPDM
Brandon Leach, CPDM
Ray Green, CPDM
Jess Clark, CPDM
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Tim Lidiak, FTA Region 3
Melanie Haake, FTA Region 3
Harmony Etzweiler, FHWA Pennsylvania (PA) Division
Jennifer Crobak, FHWA PA
Gene Porochniak, FHWA PA
Ronnique Bishop, FHWA PA
Michelle Goddard, FHWA PA

Mark Hammert, FHWA PA
Kevin Harrison, FHWA PA
Bill Houpt, FHWA PA
Rich Kercher, FHWA PA
Matt Smoker, FHWA HQ

Pennsylvania FFY 2027-2030 STIP Federal Planning Finding

This is the documented Federal Planning Finding (FPF) for the Pennsylvania Federal Fiscal Year (FFY) 2027-2030 Statewide Transportation Improvement Program (STIP) and all incorporated Transportation Improvement Programs (TIPs). This FPF is being issued by the Federal Highway Administration (FHWA) Pennsylvania Division and the Federal Transit Administration (FTA) Region III for Pennsylvania's statewide, metropolitan, and nonmetropolitan transportation planning and programming processes.

The FHWA and FTA find that the Pennsylvania FFY 2027-2030 STIP substantially meets the requirements of 23 United States Code (U.S.C.) 134 and 135; 49 U.S.C. 5303-5305; 23 Code of Federal Regulations (CFR) part 450, and 49 CFR part 613.

The 2027 FPF includes **2 Commendations** where the Pennsylvania Department of Transportation (PennDOT) and Planning Partners have demonstrated excellence in the planning process and **4 Recommendations** for continued improvement. There are no Corrective Actions**.** Please see the Findings section beginning on page 2 for details.

The FHWA and FTA are committed to assisting PennDOT and the Planning Partners to review and implement the Recommendations identified in this FPF. The 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 2027 STIP approval date.

What is the Federal Planning Finding (FPF)?

The FPF is a formal action taken by the 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 49 CFR part 613. The FPF is a formal opportunity to highlight what works well and also identify opportunities for improvement to the statewide, metropolitan, and nonmetropolitan transportation planning processes. The FPF applies to both PennDOT and the Planning Partners and is a required prerequisite to the joint approval of the STIP by the FHWA and FTA.

For additional background information on the FPF, please see **Appendix A** at the end of this document.

There are three categories of findings in the FPF:

1) **Corrective Actions:** Items identified where the planning 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 there still may be opportunities to improve one or more elements of the transportation planning process. Recommendations can include enhancements to planning processes, planning emphasis areas, emerging technologies, or agency initiatives.

3) **Commendations:** Activities or initiatives that demonstrate innovative, highly effective, and well-thought-out procedures for implementing the planning requirements. Such efforts may

represent a national model for implementation that can be cited as a good practice example for others.

Findings:

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

1. **Maximizing Federal Transportation Investments**

The FHWA and FTA commend PennDOT on their robust planning process and successful efforts to deliver federal transportation programs. PennDOT's ability to effectively utilize federal transportation formula funding programs, along with their consistent usage of additional obligation authority through the annual August redistribution process, reflect a strong commitment to maintaining and improving the transportation system in the Commonwealth of Pennsylvania.

In addition, PennDOT has pursued United States Department of Transportation (USDOT) competitive funding opportunities. The Large Bridge Investment Program (BIP) grant for the I-83 South Bridge Replacement Project is the largest federal transportation grant ever received and obligated in Pennsylvania. PennDOT has maintained an Infrastructure Investment and Jobs Act (IIJA) grants website, which provides resources, grant alerts, and a listing of projects that have received grant awards. This is a great resource for both the Planning Partners and other transportation stakeholders in Pennsylvania. PennDOT has also created the Decision Support Tool (DST), which allows for the ranking and prioritization of projects for grant applications. Finally, PennDOT's work with direct recipients and as a pass through to assist local entities with grant projects and working through challenging issues is commendable. By facilitating pass through agreements and providing education and outreach to grant recipients, PennDOT has helped to support the successful delivery of these projects for the overall benefit of the Commonwealth's transportation network.

2. **Truck Parking**

The FHWA and FTA commend PennDOT on their ongoing efforts to find solutions to truck parking needs across the Commonwealth. These activities support the consideration of freight and stakeholder consultation in PennDOT's statewide planning process, as reflected in 23 CFR 450.206 and 23 CFR 450.210.

PennDOT has set aside National Highway Performance Program (NHPP) funding in the 2027 STIP for truck parking projects around the state via a Truck Parking Reserve line item that is programmed on the Statewide Items TIP. This effort is intended to provide $9 million over the 4 years of the STIP for improving freight truck parking capacity. PennDOT is also adding 1,202 designated truck parking spaces across 133 locations by the end of 2026. This expansion of commercial vehicle parking will utilize existing state-owned properties and highway rights-of-way to provide commercial drivers with safe options to meet federal hours-of-service rest requirements, which will help to create safer highways,

improved freight efficiency, and better working conditions.

Another PennDOT truck parking effort has been the creation of a directory and interactive map, available on the 511PA website and mobile/smartphone application, which tracks available public truck parking sites across Pennsylvania. PennDOT has collaborated with the Pennsylvania State Police (PSP) to identify safe enforcement sites and new legal truck parking locations that can be designated quickly and cost-effectively. In addition, PennDOT's Truck Parking Task Force works directly with municipal leaders, planning partners, and the freight industry along key Interstate corridors (such as I-79, I-80, and I-81) to address localized truck parking demands and explore long-term facility solutions.

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 the FHWA, FTA and PennDOT. Through the 2027 TIP development process, the FHWA and FTA observed continuing challenges to PennDOT and the Planning Partners on the planning, programming and delivery of Highway Safety Improvement Program (HSIP) projects.

The FHWA and FTA recognize that PennDOT has made a concerted effort to improve their HSIP processes. As part of the 2027 TIP review meetings with MPOs/RPOs, District Offices, and Program Center staff, PennDOT emphasized the identification of HSIP-eligible projects with the goal of helping to advance safety projects in each region. PennDOT has also created an updated HSIP application website to further streamline the funding request and approval process.

To build on this momentum, the FHWA and FTA recommend that PennDOT take the following steps:

- As defined in PennDOT's 2027 General and Procedural Guidance, implement the annual April redistribution of funds that remain unprogrammed in regional line items in order to place the funding on projects that can be obligated by the end of the current FFY.
- Research the current challenges to HSIP project delivery to identify the root causes and provide a briefing to FHWA and FTA.
- Finalize efforts to publish simplified, user-friendly documents and visualization guides that explain how to successfully identify, select, and program all types of safety projects.

2. Integration of Asset Management and Transportation Performance Management (TPM)

The FHWA and FTA recognize that PennDOT has long maintained a preservation-first focus and has made considerable progress in developing and improving their Bridge Asset Management and Pavement Asset Management Systems (BAMS & PAMS), along with AssetFox and ProjectBuilder. PennDOT's Asset Management section has initiated training for the BAMS/PAMS systems for the District Offices and the MPO/RPO Planning Partners. Asset management was a key discussion topic during the 2027 TIP review meetings, and the FHWA and FTA support the pending restart of PennDOT's Asset Management Steering Committee.

During the 2027 TIP development process, the FHWA and FTA observed continuing challenges to PennDOT and the Planning Partners on fully utilizing the Asset Management Systems (AMS), including the timing of AMS outputs, competing project priorities, and ongoing technical training needs on how to effectively use the data outputs in the planning process. PennDOT did not evaluate the expected long term performance outcomes of the draft 2027 STIP during the STIP development process. In addition, based on the most recent Pennsylvania Transportation Asset Management Plan (TAMP) consistency determination, TIP submissions, and other stakeholder feedback, it still appears that PennDOT's AMS are not being used to a level that can effectively guide investment priorities and drive project selection to achieve optimal long term performance. Although the TAMP is a fundamental step in the planning process, PennDOT used Engineering and Construction Management System (ECMS) data to evaluate TAMP implementation rather than planning-level data sets.

The FHWA and FTA recommend the following to improve consistency between the TAMP, the STIP/Twelve-Year Program (TYP), and the regional MPO/RPO LRTPs and more successfully integrate PennDOT's AMS into project selection:

- PennDOT should designate an Executive Champion to advocate for the long term performance benefits of selecting projects based on lowest life-cycle costs using the AMS. The FHWA and FTA also recommend that PennDOT expand AMS training and outreach to help accelerate District-level AMS adoption ahead of the 2029 STIP cycle.
- PennDOT should continue exploring the use of planning-level data sets to evaluate TAMP implementation.
- PennDOT should establish long range life-cycle planning at the network level and carefully evaluate condition data and expected infrastructure condition outcomes as part of the pending 2027 TAMP update, which is due to the FHWA on March 31, 2027. The TAMP should provide a gap analysis, which examines and analyzes challenges to asset management utilization and offers a plan to overcome identified challenges, prioritize improvements, and align investments with PennDOT's strategic goals. Input from PennDOT planning and District staff on the AMS outputs could provide insight into user experiences and how system outputs might be made more user-friendly.

3. LRTP Development Process

The FHWA and FTA have observed recurring LRTP issues, including the rushed development of plans (late agency coordination, limited review time prior to public comment periods or plan adoption, etc.) and a lack of awareness about air quality conformity requirements and deadlines. These occurrences increase the risk of plan expiration and demonstrate the need for further improvement and greater focus on the LRTP development process.

To ensure LRTPs are compliant with federal planning requirements, it is imperative that PennDOT and FHWA & FTA have sufficient review time to work with MPOs/RPOs to address any material issues prior to public comment and adoption. To that end, the FHWA and FTA have been working with PennDOT to bring consistency to how LRTPs are submitted through a more formal review process and a checklist that must be completed prior to the start of the LRTP public comment period.

PUB 575, PennDOT's current LRTP guidance, is a good resource which is readily available to the MPOs/RPOs when they develop their LRTPs. In practice, however, the FHWA and FTA have not seen the expected levels of usage and awareness of this guidance. To address this, PennDOT should further promote their LRTP guidance using structured delivery methods such as webinars and the sharing of effective practices to highlight benefits.

4. Transit Coordination

The 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 supported the Planning Partners by providing planning guidance to ensure that federal and state requirements are incorporated in the FFY 2027-2030 TIPs. The planning guidance has the additional benefit of affirming a continuing, cooperative, and comprehensive transportation process across Pennsylvania. Despite these efforts, the FTA and FHWA continue to observe inconsistencies regarding the inclusion of transit projects, the transit financial capacity analysis' connection to demonstrating fiscal constraint, and the link between transit projects and performance-based planning and programming requirements.

Additionally, the FTA and FHWA have observed a significant variance in the last update of the Transportation Planning Agreements between Pennsylvania's MPOs, PennDOT, and the area public transit agencies. Several of the Transportation Planning Agreements were last approved over a decade ago. Although there are no federal regulations dictating the exact frequency these should be updated, 23 CFR 450.314(b) requires that MPOs, states and transit providers should periodically review and update these agreements. This ensures these agreements are reflective of changes that may have been imposed at the federal or state level.

To resolve these issues, the FTA and FHWA recommend that PennDOT continually review and evaluate

the planning guidance provided to the Planning Partners to ensure consistency across MPOs regarding federal planning requirements. Similarly, it is recommended that PennDOT assess their internal review procedures to incorporate modifications that will identify and address these discrepancies for future submissions.

Appendix A: Federal Planning Finding (FPF) Background

What are the statutory and regulatory requirements for the FPF?

The Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU) (Public Law 109-59) contained statutory requirements, codified in Title 23 and Title 49, that the Secretary of Transportation 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) (Public Law 112-141); the Fixing America's Surface Transportation Act (FAST Act) (Public Law 114-94); and the Infrastructure Investment and Jobs Act (IIJA) (Public Law 117-58) 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)].

The FHWA and FTA adopted joint implementing regulations for these requirements, which can be 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?

The 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 other key stakeholders.

The 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, additional opportunities for assessment include 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.

US ENVIRONMENTAL PROTECTION AGENCY LETTER

REGION 3
PHILADELPHIA, PA 19103

September 17, 2026

Mr. Clint Beck
Division Administrator
Federal Highway Administration
Pennsylvania Division
228 Walnut Street, Room 508
Harrisburg, Pennsylvania 17101-1720

Via email at clint.beck@dot.gov

Dear Mr. Beck:

The U.S. Environmental Protection Agency (EPA) has reviewed the conformity determinations for the Fiscal Year (FY) 2027-2030 Statewide Transportation Improvement Program for 21 metropolitan planning organizations (MPOs) within the Commonwealth of Pennsylvania. In addition, EPA has reviewed updated Long Range Transportation Plans (LRTPs) for Reading MPO, Blair County MPO, Lackawanna/Luzerne MPO, Delaware Valley Regional Planning Commission MPO, and Southwestern Pennsylvania Commission MPO. The 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 2027-2030 Transportation Improvement Program through the horizon year of their LRTPs. Therefore, the required conformity actions are covered in the new FY 2027-2030 STIP and the regional LRTPs.

The EPA's review of the conformity determinations indicate 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. It should be noted that in the technical support documents, the EPA is deferring to the Federal Highway Administration (FHWA) on the question of whether the regional LRTPs and STIP are fiscally constrained. The EPA concurs on the overall conformity determination based on the FHWA's determination that the regional LRTPs and TIP are fiscally constrained.

If you have any questions, please do not hesitate to contact Michael Gordon, Chief, Planning & Implementation Branch, Air & Radiation Division, 1600 John F. Kennedy Boulevard, Philadelphia, Pennsylvania 19103, at (215) 814-2039 or gordon.mike@epa.gov or Gregory Becoat, at (410) 305-3026 or becoat.gregory@epa.gov.

Sincerely,

MICHAEL DUNN

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Michael J. Dunn, Acting Director
Air and Radiation Division

ENCLOSURES

1. 1997 O2 2027-2030 TIP 2050 LRTP- Lackawanna and Luzerne Counties Conformity Determination TSD
2. 1997 O2 2027-2030 TIP 2050 LRTP- Blair County Conformity Determination TSD
3. 1997 O2 2027-2030 TIP 2045 LRTP- Franklin County Conformity Determination TSD
4. 1997 O2 2027-2030 TIP 2045 LRTP- Mercer County Conformity Determination TSD
5. 1997 O2 2027-2030 TIP 2055 LRTP- Centre County Conformity Determination TSD
6. 1997 O2 2027-2030 TIP 2050 LRTP- Monroe County Conformity Determination TSD
7. 1997 O2 2027-2030 TIP 2050 LRTP- Adams County Conformity Determination TSD
8. 1997 O2 2027-2030 TIP 2050 LRTP- Clearfield County Conformity Determination TSD
9. 1997 O2 2027-2030 TIP 2050 LRTP- Erie County Conformity Determination TSD
10. 1997 O2 2027-2030 TIP 2050 LRTP- Tioga County Conformity Determination TSD
11. 1997 O2 2027-2030 TIP 2050 LRTP- Wyoming County Conformity Determination TSD
12. 2008 O2 2027-2030 TIP 2050 LRTP- Reading Conformity Determination TSD
13. 1997 O2 and 2006 PM2.5 2027-2030 TIP 2050 LRTP- Johnstown Conformity Determination TSD
14. 1997 O2 and 2006 PM2.5 2027-2030 TIP 2050 LRTP- York Conformity Determination TSD
15. 2008 O2 2006 PM2.5 2027-2030 TIP 2050 MTP- Lancaster Conformity Determination TSD
16. 2008 O2 2027-2030 TIP 2050 LRTP- Carbon County NEPA Conformity Determination TSD
17. SPC 2027-2030 TIP and 2050 LRTP Conformity Determination TSD
18. 1997 O2 2006 PM2.5 and 2012 PM2.5 2027-2030 TIP 2045 LRTP- Lebanon Conformity Determination TSD
19. 1997 O2 and 2006 PM2.5 2027-2030 TIP 2050 LRTP- Harrisburg Conformity Determination TSD
20. 2008 O2 2006 PM2.5 2027-2030 TIP 2050 LRTP- Lehigh Valley Conformity Determination TSD
21. FY 2027 PA TIP and 2050 LRTP - Multiple NAAQS for DVRPC TSD

Cc: Jennifer Crobak, FHWA (via email at jennifer.crobak@dot.gov)
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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

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