



U.S. Department
of Transportation

SEP 29 2016

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Ms. Leslie S. Richards
Secretary of Transportation
Commonwealth of Pennsylvania
Harrisburg, Pennsylvania

**Re: Pennsylvania FFY 2017-2020 Statewide Transportation Improvement
Program & Air Quality Conformity Determinations**

Dear Ms. Richards:

We have completed our review of the Pennsylvania Federal Fiscal Year (FFY) 2017-2020 Statewide Transportation Improvement Program (STIP) submitted with your letter dated August 11, 2016. 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 Federal Transit Administration (FTA) and the Federal Highway Administration (FHWA) approve the Pennsylvania FFY 2017-2020 STIP, which includes the individual Transportation Improvement Programs (TIPs) for all Metropolitan Planning Organizations (MPOs) and Rural Planning Organizations (RPOs), and the PennDOT Interstate Management Program.
2. The FTA and FHWA find that the projects contained in the above-mentioned STIP and MPO/RPO TIPs are based on transportation planning processes that meet the requirements of the FAST Act, Fixing America's Surface Transportation Act (P.L. 114-94); 23 U.S.C. Sections 134 and 135; 49 U.S.C. Sections 5303 and 5304; and 23 CFR part 450 subpart A, B and C.

3. The FTA and FHWA, in concurrence with the Environmental Protection Agency (EPA), have determined that the Conformity Determinations for the FFY 2017-2020 STIP/TIPs and the Long Range Transportation Plan (LRTP) updates for nonattainment and maintenance areas of the Commonwealth, adequately address and meet the requirements as specified in the November 1993 Federal Conformity Rule and subsequent amendments. This includes all ten (10) conformity determinations for areas that are currently designated under the existing National Ambient Air Quality Standards (NAAQS) (see the attached table for the list of nonattainment/maintenance areas and applicable NAAQS) and for those that will be designated under the 2012 annual PM_{2.5} NAAQS in the future. Specific mention is warranted for the Johnstown Area Transportation Study, Lancaster County Transportation Coordinating Committee, and the Reading Area Transportation Study MPOs that have developed and adopted new LRTPs extending the time horizons of their LRTPs concurrently with this STIP update. The LRTP update and conformity determination cycles for these regions will begin on the date of this letter.
4. Based on our joint review of the overall Pennsylvania statewide, metropolitan, and rural transportation planning processes, the FTA and FHWA are issuing the FFY 2017-2020 STIP Planning Finding, as enclosed.

If you have any questions regarding this determination, please do not hesitate to contact either Timothy Lidiak, AICP, FTA Community Planner, at 215-656-7084 or timothy.lidiak@dot.gov; and/or Matt Smoker, FHWA Transportation Planning Program Manager, at 717-221-3703 or matt.smoker@dot.gov.

Sincerely,



Terry Garcia Crews
Regional Administrator
FTA Region III



Renee Sigel
Division Administrator
FHWA Pennsylvania Division

Enclosure

cc: James Ritzman, PennDOT
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Pennsylvania Nonattainment/Maintenance Areas

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

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

(P) = Partial County

Pennsylvania FFY 2017-2020 STIP Planning Finding

Issued by FTA Region III and FHWA Pennsylvania Division for Statewide, Nonmetropolitan, and Metropolitan Transportation Planning and Programming Processes

This is the documented Planning Finding for the Pennsylvania FFY 2017-2020 Statewide Transportation Improvement Program (STIP) and all incorporated Transportation Improvement Programs (TIPs).

BACKGROUND INFORMATION

What is a Planning Finding?

- A Planning Finding is a formal action taken by the Federal Transit Administration (FTA) and Federal Highway Administration (FHWA) to ensure that STIPs and TIPs are developed according to Statewide and metropolitan transportation planning processes consistent with required statutory and regulatory planning and related provisions.
- A Planning Finding is a formal opportunity to highlight what works well and what needs improvement in a Statewide or metropolitan transportation planning process.
- A Planning Finding is a prerequisite to FTA/FHWA approval of the STIP and based on a planning process that substantially meets the requirements of Title 23 and Title 49.

What are the statutory and regulatory requirements for the planning findings?

- The Fixing America's Surface Transportation Act (FAST Act) contains a statutory requirement for a Planning Finding associated with the STIP, codified in 23 U.S.C. 135 (g)(8).
 - 23 U.S.C. does not contain a similar statutory requirement for a Planning Finding associated with TIPs.
- Through regulation, the requirement for a Planning Finding applies to both the TIP (23 CFR 450.330(a)) and the STIP (23 CFR 450.220(b)).

PLANNING PROCESS OBSERVATIONS AND SUGGESTED IMPROVEMENTS

The following strengths of the statewide and metropolitan transportation planning processes have been identified:

- The Pennsylvania Department of Transportation (PennDOT) and the Metropolitan Planning Organizations (MPOs) and Rural Planning Organizations (RPOs) strongly support performance management and performance-based planning to ensure sound investment into the transportation decision-making process. To support performance management and performance-based planning, PennDOT developed a Transportation Investment Plan. The Transportation Investment Plan provides business intelligence, analytics, and

technical assistance to ensure innovative solutions, sound stewardship, and collaborative transparent decisions. The purpose of the Transportation Investment Plan is to make ongoing assessments and to re-evaluate data associated with the Transportation Investment Plan decisions ensuring that each dollar invested is being directed in a fashion that meets PennDOT's strategic performance decisions and that enhances the overall performance of the Commonwealth's transportation system.

- As part of PennDOT's new performance management and performance-based planning approach to STIP development, PennDOT created an Interstate Management Committee to collectively evaluate, analyze, and develop the PennDOT Interstate Management TIP. This effort included each PennDOT District to deliver a District "State of the Interstate" presentation. PennDOT Central Office and the Districts should consider sharing these informative presentations with the Planning Partners.
- PennDOT Catalyst Team efforts and initiatives. The Planning Catalyst Team was formed to guide the implementation of Results-Oriented Planning. The vision of the Catalyst Team is to foster collaboration among key land use and transportation stakeholders, in order to promote vitality, economic growth, and mobility in Pennsylvania's communities.
- For the first time, the PennDOT Secretary's "Spike" funding recommendations were provided early in the program development process. This assisted the MPOs and RPOs in their overall planning efforts. The recommended "Spike" funded projects in the FY2017-2020 STIP continued previous "Spike" funded commitments, aligned with PennDOT's Transportation Investment Plan goals, and provided a significant investment in the Interstate System.
- PennDOT's commitment to ensuring the importance of transportation planning management systems via electronic web-based applications such as the Multimodal Project Management System (MPMS), MPMS Interactive Query (MPMS IQ), PennDOT SharePoint, Endeca, PennShare, and the Linking Planning & NEPA (LPN) process.
- The Moving Ahead for Progress in the 21st Century Act (MAP-21) included a number of provisions to improve the condition and performance of the primary freight network and support investment in freight-related surface transportation projects. 23 U.S.C. 167 and Section 1116 of the FAST Act established a new dedicated funding National Highway Freight Program (NHFP) to improve the efficient movement of freight on the required National Highway Freight Network (NHFN). Beginning on December 4, 2017 (two years after enactment of the FAST Act), a State may not obligate NHFP funds unless it has developed a freight plan that is consistent with 49 U.S.C. 70202—although the multimodal component of that plan need not be complete by that time. [23 U.S.C. 167(i)(4)] State Freight Plan guidance is currently being prepared by FHWA for FAST Act compliance determination. The FHWA Division Office will work with PennDOT and MPOs/RPOs to ensure all freight projects and freight network criteria identified in the guidance is met and revised, as necessary. PennDOT's development and future implementation of the stand-alone Comprehensive Freight Mobility Plan, the designation of freight staff, the

identification of Critical Rural and Urban Freight Corridors, and establishment of ancillary tasks such as freight modeling, demonstrates their commitment to the importance of freight movement in the Commonwealth and to fulfilling the requirements of the FAST Act.

- PennDOT's commitment to continue the collaborative statewide financial guidance process and demonstration of financial constraint, including financial projections provided to Planning Partners to be utilized for their financial plans and LRTPs.
- PennDOT's General and Procedural Guidance for the STIP and transportation planning processes.
- PennDOT's development and subsequent revisions to the Linking Planning & NEPA (LPN) process is aimed at integrating the program development and project delivery processes. The LPN has been accepted by FHWA as an equivalent approach for the Planning Environment Linkage questionnaire under the Every Day Counts initiative. PennDOT should showcase the LPN efforts of the Southwestern Pennsylvania Commission (SPC) and York Area MPO (YAMPO) to aid other Planning Partners and/or PennDOT Districts in advancing a consistent and systematic implementation of PennDOT's Design Manual 1 - Project Delivery Process across the Commonwealth.
- Pennsylvania's Metropolitan Planning/State Planning and Research (PL/SPR) formula provides a fair and reliable distribution of financial resources for the MPOs and RPOs to carry out a continuing, cooperative, and comprehensive (3-C) multimodal transportation planning process.
- PennDOT and FHWA Planning Process Reviews for the non-TMA MPOs and RPOs. The purpose of the Planning Process Review is to ensure adequate oversight, administration, and coordination of the statewide, metropolitan, and non-metropolitan planning processes, including but not limited to, the review of regional LRTPs and schedules, unified planning and work programs (UPWP), transportation improvement programs (TIP), public participation plans (PPP), etc. To date, we completed very successful reviews of the Centre County and Lebanon County MPOs.
- Increased utilization of the Pennsylvania State Transportation Commission (STC) website (www.talktparansportation.com) is a key component of PennDOT's public involvement and outreach process. The STC conducted an online public meeting for the STIP and the Twelve Year Program. This noteworthy practice to actively engage the public provided a cost effective venue to share transportation updates, discuss areas of investment and transportation priorities, answer questions, and gather feedback regarding transportation priorities from the public's perspective. The STC website also hosted an online survey to solicit direct input from the public, featuring an interactive map to locate geographic specific transportation issues. The public comments were summarized and results were posted to the website.

- Many MPOs/RPOs have also increased the use of online resources and social media tools to provide information to the public, to help educate the public, and to solicit public input in order to seek information and ideas for more meaningful decision-making in transportation planning. MPOs/RPOs with noteworthy practices include the Williamsport Area Transportation Study, the Delaware Valley Regional Planning Commission, the Southwestern Pennsylvania Commission, the SEDA-Council of Governments, and the North Central Pennsylvania Planning and Development Commission.
- Air Quality Interagency Consultation Process, a documented and formalized process involving PennDOT's Air Quality Work Group.
- STIP/TIP Modification Procedures Memorandum of Understanding for STIP/TIP amendments and administrative actions.
- The RPO process assures high-level consideration of input from locally elected and/or appointed officials and residents, in non-metropolitan areas.

The following areas of the statewide and metropolitan transportation planning processes have been identified for improvement:

- FHWA requests that PennDOT develop a multi-year schedule to continue conducting the PennDOT-led Planning Process Reviews for all non-TMA MPOs and RPOs to ensure adequate oversight, administration, and coordination of the statewide, metropolitan, and non-metropolitan planning processes.
- The PennDOT Planning Priorities Letter is intended to help guide the development of the MPO/RPO UPWPs. However, for the FY 2016-2018 UPWPs, the majority of the MPOs/RPOs used the Planning Priorities Letter as a template instead of as a guidance document. A large number of MPOs/RPOs did not tailor their UPWPs to fit their unique needs, specific planning tasks, or to document the tasks they actually commit to completing within the two-year period. For the FY 2018-2020 UPWPs, the PennDOT Program Center should consider working closely with the MPOs/RPOs to customize the UPWPs to document the distinctive and specific planning activities and work products that are to be completed.
- In accordance with 23 CFR 450.334, the Planning Partners, public transportation operators, and PennDOT shall cooperatively develop an 'annual listing of obligated projects' for which federal transportation funds were obligated in the preceding federal fiscal year for each planning partner region in the state. The listings shall be published, or otherwise made available, in accordance with the Planning Partners' public participation plans. The Harrisburg Area Transportation Study produces a noteworthy example.
- In accordance with 23 CFR 450.314, FHWA and FTA highly encourages the Planning Planners, PennDOT, and public transportation operators to cooperatively review and

update their respective planning agreement Memorandums of Understanding (MOUs) to account for the provisions related to the development and sharing of performance data, selection and reporting of targets, and data collection for the state asset management system for the National Highway System (NHS). The revised MOUs should accurately document and capture each agency's existing and future role in the metropolitan transportation planning process. This includes the Planning Partner(s), PennDOT Engineering District, PennDOT Central Office, the public transportation operators, etc. To the extent possible, a single written planning agreement MOU between all responsible agencies should be cooperatively developed and adopted to accurately document the collaborative planning processes, adequately reflect the various respective and mutual roles, responsibilities, and procedures governing the cooperative efforts in carrying out the federal and state required transportation planning processes. In addition, the planning agreement MOU will help facilitate any future succession planning, as well as identify the existing and future work tasks and collaboration opportunities. Items and tasks to be included, at a minimum: data collection activities, including those related to performance management; the development of MPO committee meeting agendas and meeting materials; the Annual List of Obligated Projects; the development of the UPWP, the LRTP; the TIP; PennDOT's LPN process; PennDOT Connects/Planning and Engineering 360°; performance measure target setting and tracking reports; public participation plan activities; website administration; etc.

- Since the passage of the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU), coordination with the federal and state resource agencies for long range transportation planning purposes has been accomplished through PennDOT's Agency Coordination Meetings (ACM) in order to meet the requirements of 23 CFR 450.324(f)(10). However, as it is currently designed, this is not the most effective system for gathering meaningful input from the resource agencies. The ACM was designed for PennDOT to present detailed project information. The resource agency ACM attendees are typically focused on project impacts and permitting, or decision-making at the project level. While they can provide useful information, they are often not the decision-makers when it comes to a planning or policy level effort. Therefore, FHWA recommends forming a work group charged with the task of developing a planning version of the ACM, with the agency representatives who are the decision-makers at the program and planning level.
- PennDOT's Program Center and the Bureau of Equal Opportunity shall continue to work with the MPOs and RPOs in the assessment of Planning Partners' PPPs. Specifically, the review should focus on ensuring that the document is not so complex that it fails to afford reasonable opportunity for consideration of public information. Evaluate and modify PPPs and processes, as necessary, to ensure diverse representation on non-elected, or Governor appointed, planning boards, advisory councils or committees. Ensure that public notices include announcements of the availability of aids and services to provide effective communication for those persons with disabilities and limited English proficiency.

The following areas of the statewide and metropolitan transportation planning processes have been identified for enhancement:

- The PennDOT Program Center should improve their internal QA/QC for the Air Quality Interagency Consultation Process in determining which projects are coded as exempt, significant, or not regionally significant. This includes utilizing comments received from federal and state agencies to screen the various TIPs submitted by the MPOs, or Districts.
- In order to broaden support and engage in more collaborative discussions regarding PennDOT programs or initiatives, PennDOT Central Office should consider developing presentations and various materials in order to disseminate consistent information to all MPOs/RPOs and PennDOT Districts. Examples include, HSIP, SHSP, freight plan, historic metal truss bridge management plan, transit capital planning tool, the Transportation Investment Plan, PennDOT Connects, a planner in every district, etc. To date, other than at the Annual PennDOT Planning Partners meeting, little to no information is being shared with the MPO/RPO Committees or Boards.
- For new PennDOT initiatives that are to be implemented by the Districts and/or MPOs/RPOs, consider a role by PennDOT Central Office on how they can to provide oversight or assistance to ensure that implementation is consistently occurring in all districts or MPOs/RPOs, as well as, to provide technical support and share noteworthy practices.
- The functional classification of roadways defines the role each element of the roadway network plays in serving travel needs. As a result of MAP-21 and FAST Act Federal-aid program changes, functional classification has come to assume additional significance beyond its purpose as a framework for identifying the particular role of a roadway in moving vehicles through a network of highways. Functional classification carries with it expectations about a roadway's design, including its speed, capacity, and relationship to existing and future land use development. Federal transportation legislation continues to use functional classification in determining eligibility for funding under the Federal-aid program. As agencies continue to move towards a more performance-based management approach, functional classification will be an increasingly important consideration in setting expectations and measuring outcomes for preservation, mobility, and safety. With MAP-21 and the FAST Act's fundamental shift of focusing a significant portion of FHWA funding to the higher order National Highway Performance Program (NHPP) and NHFP roadways which include the Interstate, NHS, NHFN, and principal arterials, the FHWA Pennsylvania Division has concerns that many of the State's Planning Partners have not reviewed, analyzed, or updated their overall functional classification and Intermodal connectors since the 2000 Census, or earlier. Therefore, FHWA highly recommends and encourages PennDOT and the Planning Partners to complete a comprehensive and coordinated review of the functional classification systems, to include a systematic review, of their current NHS intermodal connectors, and to develop Critical Rural and Urban Freight Corridors as part of the NHFP and NHFN.

- PennDOT and the Planning Partners need to evaluate the methods utilized by MPOs and RPOs to track and report Disadvantaged Business Enterprises (DBE) and small business utilization on federally-funded planning contracts. Emphasis should be placed on tracking commitment data by NAICS code and accurate reporting of actual payments made to DBEs. It is recommended that PennDOT District and Central Office Planning & Programming staff participate in these trainings with their planning partners.
- PennDOT and Planning Partners should develop an approach to ensure that determinations of benefits and burdens are based on the totality of circumstances and adequately documented. Efforts should be made to ensure that benefits are not overemphasized resulting in broad unsubstantiated conclusions. Further, PennDOT and Planning Partners should exercise caution in the use of thresholds in the Environmental Justice (EJ) analysis. Efforts should be made to focus the EJ analysis on the effects of transportation actions, and less emphasis on population size. Finally, PennDOT and Planning Partners should expand the EJ analysis to include identification and evaluation of potential public health concerns of transportation planning programs, policies and activities when assessing the potential long-term effects of those actions.
- FHWA is committed to continue working with PennDOT and the Planning Partners in order to be proactive, forwarding leaning, and continue being on the cutting edge of nationally recognized best practices. Therefore, FHWA recommends that PennDOT, the Planning Partners, and FHWA, cooperatively develop an action plan describing how the above-identified improvements will be considered and/or achieved. The action plan should be developed and agreed upon within three (3) months from the date of the STIP approval letter. At a minimum, FHWA and PennDOT should meet on a quarterly basis to mutually address the issues identified in this Federal Planning Finding and discuss other priorities.