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SEP 25 2018

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

**Re: Pennsylvania FFY 2019-2022 Statewide Transportation Improvement
Program & Air Quality Conformity Determinations**

Dear Ms. Richards:

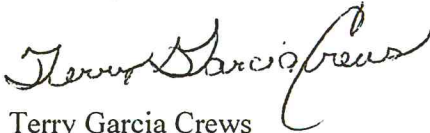
The Federal Transit Administration (FTA) and the Federal Highway Administration (FHWA) have completed our joint review of the Pennsylvania Federal Fiscal Year (FFY) 2019-2022 Statewide Transportation Improvement Program (STIP) submitted with your letter dated August 16, 2018. Based on our review of the 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. FTA and FHWA, in concurrence with the Environmental Protection Agency (EPA), have determined that the Conformity Determinations for the FFY 2019-2022 TIPs in all 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) 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 on February 16, 2018 addressing conformity requirements for former 1997 ozone (see the attached table for the list of nonattainment/maintenance areas, applicable NAAQS, and 1997 ozone areas). These air quality conformity determination approvals for these regions will reset the 4-year timeclock to begin on the date of this letter.
2. The FTA and the FHWA approve the Pennsylvania FFY 2019-2022 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.

3. 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.
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 2019-2022 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



Alicia Nolan
Division Administrator
FHWA Pennsylvania Division

Enclosure

ec: James Ritzman, PennDOT
Jennie Granger, PennDOT
Larry Shifflet, PennDOT
Jim Arey, PennDOT
Mike Baker, PennDOT
All Pennsylvania MPOs and RPOs
Gregory Becoat, EPA Region III

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 ozone NAAQS.

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	Maintenance
York	2006 24-Hour PM _{2.5}	Harrisburg-Lebanon-Carlisle-York, PA	York	Maintenance
	1997 8-hour Ozone	York, PA	York	Maintenance
Lancaster	2008 8-hour Ozone	Lancaster, PA	Lancaster	Marginal
	2006 24-Hour PM _{2.5}	Lancaster, PA	Lancaster	Maintenance
Lebanon	2012 Annual PM _{2.5}	Lebanon County, PA	Lebanon	Moderate
	2006 24-Hour PM _{2.5}	Harrisburg-Lebanon-Carlisle-York, PA	Lebanon	Maintenance
	1997 8-hour Ozone	Harrisburg-Lebanon-Carlisle, PA	Lebanon	Maintenance
Johnstown	1997 8-hour Ozone	Johnstown, PA	Cambria	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	Maintenance

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

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

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

Pennsylvania FFY 2019-2022 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 2019-2022 Statewide Transportation Improvement Program (STIP) and all incorporated Transportation Improvement Programs (TIPs).

BACKGROUND INFORMATION

What is a Planning Finding?

1. 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.
2. A Planning Finding is a formal opportunity to highlight what works well and what needs improvement in a Statewide or metropolitan transportation planning process.
3. 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 **Corrective Action** of the statewide and metropolitan transportation planning processes has been identified:

1. All Pennsylvania Planning Partners, transportation operators and the State must cooperatively develop an Annual Listing of Obligated Projects for which Federal funds have been obligated in the previous year in accordance with 23 CFR 450.334. This requirement applies specifically to MPOs; however, since PennDOT has developed agreements with the RPOs that position RPOs as equals with regard to MPO planning requirements, FTA and FHWA strongly recommend that the RPOs meet this

requirement for transparency purposes. The listing must include all Federally-funded projects authorized or revised to increase obligations in the preceding program year and at a minimum, include the following for each project:

- The amount of funds requested in the TIP
- Federal funding obligated during the preceding year
- Federal funding remaining and available for subsequent years
- Sufficient description to identify the project or phase
- Identification of the agencies responsible for carrying out the project or phase

The listing of projects, including investments in pedestrian walkways and bicycle transportation facilities, must be published or otherwise be made available in accordance with the MPO's public participation criteria for the TIP within 90 calendar days of the end of the program year. Furthermore, cooperative procedures among the State, the MPO, and transit operators to submit the fund-obligation information necessary for this report should be set forth in the MPO Agreement [CFR 450.314(a)].

In addition, PennDOT needs to play a more active oversight role to ensure this requirement is carried out on an annual basis.

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

1. Pennsylvania and PennDOT continue to stand out as a state and transportation agency with robust and highly collaborative transportation planning and programming processes at the statewide, metropolitan, and rural levels. These processes are well documented as “strengths” in numerous prior STIP Planning Findings. While those previous “strengths” still apply today; however, transportation planning is at a critical junction in time which requires that all transportation partners need to rely on our strong relationships and mutual trust to discuss how best to address these new challenges.

MAP-21 and the FAST Act, in addition to final planning and Transportation Performance Management (TPM) and Asset Management regulations, ushered in a new era in transportation planning and decision-making that uses system information to make investment and policy decisions to achieve national performance goals.

Performance Based Planning and Programming (PBPP), Asset Management, and TPM are to be applied systematically in a regular, ongoing process. TPM is an approach to managing transportation system performance outcomes. Asset Management is the application of this approach to manage the condition of the infrastructure assets that are needed to provide for mobility and safety on our national, state, and regional

transportation system. In short, asset management is the engine that drives infrastructure performance. PBPP refers to the usage of TPM and asset management into the federal 3-C (Comprehensive, Cooperative, and Continuing) planning and decision-making process.

Transportation planning today faces a cultural change in data collection, management, and analysis; in adopting targets, measurements, and in investments planning; in communicating, sharing, and reporting on system metrics; and in developing investments decisions across all transportation assets or modes. It is fundamentally necessary and self-apparent that stakeholders and decision makers at all levels of transportation planning and programming processes mutually understand and document their various roles and responsibilities. Therefore, we highly recommend that PennDOT continue to build upon its collective cooperation with the Planning Partners to re-examine the principles of the 1996 “Reengineering” concepts and to discuss how best to adapt existing planning processes (UPWP, STIP/TIP, Twelve Year Program/TYP, LRTP) while simultaneously meeting these new federal requirements. An important part of this discussion will be coming to a shared understanding of the important and valued role that each partner (PennDOT, MPO and RPOs, and FHWA and FTA) plays in the planning process.

2. For the 2018-2020 Statewide Planning & Research (SPR) Work Program and MPO/RPO Unified Planning Work Programs (UPWP), progress was made by many Planning Partners to customize the UPWP to specific tasks and priorities. Many UPWPs, however, were drafted with minimal collaboration and participation from the PennDOT Districts and FHWA. These documents were provided to FHWA shortly before Board adoption which provided limited time for FHWA review and comments. In addition, the language overall in these UPWPs can be strengthened to be more deliverable and task-based to provide for clarity, tracking, and accountability.

Prior to the next SPR Work Program and UPWP development, PennDOT, FHWA, and Planning Partners should revamp PennDOT’s Planning Priorities Letter to modify the process to reflect these specific issues. In addition, strong PennDOT guidance, oversight, and training is needed in the development of Planning Partners’ Independent Cost Allocation Plans (ICAP) and UPWP invoicing requirement and procedures.

3. In the evolution of PBPP, TPM, and asset management principles, Planning Partners should begin the process of updating their LRTP at least 30 months in advance of the adoption deadline. To kick off the LRTP update process, the Planning Partner should schedule a meeting with PennDOT District(s), the PennDOT Program Center, and FHWA to discuss the methodology, work tasks, budget, and schedule for the LRTP update process. PennDOT District and Program Center, along with FHWA, should actively participate in the LRTP update to adequately address 23 CFR 450 requirements, PBPP, TPM, and asset management principles in order to cooperatively

document the existing and future conditions and needs of the region's transportation system as well as to develop a strategy as to where to invest resources to address infrastructure condition targets.

To support a cooperative LRTP update process, PennDOT should develop or update the PennDOT Statewide LRTP Guidance to institute the roles and responsibilities of PennDOT Districts, the PennDOT Program Center, and Planning Partners in LRTP development to specifically address the federal planning requirements. For example, the PennDOT LRTP guidance is not only required to address the federal LRTP requirements but should also emphasize the importance of the process used to develop the plan, including the need to identify the parties responsible for collecting, developing, analyzing, and supplying TPM and asset management data. Identifying how TPM targets will influence the decision makers in adopting investment strategies as well as in addressing risk and managing assets for their whole life at the lowest practicable cost. Ultimately, LRTPs need to ensure that investments decisions are performance-driven and outcome based.

Associated with the Planning Partners' LRTP development process, FHWA recommends that PennDOT should form a work group charged with the task of developing a planning version of the Agency Coordination Meetings (ACM), and which should include agency representatives who are the decision-makers at the program and planning level.

4. FHWA and FTA are committed to continue working with PennDOT and the Planning Partners in order to review and address any "improvements" or "enhancements" identified and documented in the previous STIP Planning. As always, FHWA Pennsylvania Division seeks to remain proactive, forward leaning, and to continue being on the cutting edge of nationally recognized best practices. Therefore, FHWA and FTA recommend that PennDOT, the Planning Partners, and FHWA/FTA, cooperatively develop a Work Group and Action Plan describing how these FY2019 STIP Planning Findings will be considered and/or achieved. In addition, FHWA and FTA request that PennDOT include in the Action Plan any recommendations from the 2017 STIP Planning Finding that have not yet been addressed. This PennDOT Work Group shall be identified and an action plan should be developed and agreed upon within three (3) months from the date of the STIP approval letter. At a minimum, a work group comprised of the PennDOT Program Center, PennDOT District Planners, Planning Partners, FHWA, and FTA should meet on a quarterly basis to mutually address the issues identified in this Federal Planning Finding and discuss other priorities.
5. FHWA recommends that PennDOT continue to expand membership in the State Freight Work Group, including private stakeholders, and encourages the Freight Work Group to serve in an advisory role per the guidance in 49 U.S.C. 70201. An advisory committee function will also facilitate the ability of public and private stakeholders,

including but not limited to, cargo carriers and logistics companies, and safety, community, energy, and environmental stakeholders, to identify and engage the appropriate freight planning organization in each State. (Carry-over from 2017 STIP Finding).

6. FTA and FHWA published the final rule on Statewide and Nonmetropolitan Transportation Planning and Metropolitan Transportation Planning on May 27, 2016, and FTA published the final rule on Transit Asset Management (TAM) on July 26, 2016. These rules establish new requirements for metropolitan planning organizations (MPOs) to coordinate with transit providers, set performance targets, and integrate those performance targets and performance plans into their planning documents by certain dates. Transit agencies were required to set their performance targets by January 1, 2017. MPOs are also required to set performance targets for each performance measure per 23 CFR § 450.306 within 180 days after the transit agency has established their performance targets and to reference the performance targets and performance based plans into their TIPs and Metropolitan Transportation Plans on or after October 1, 2018 per 23 CFR § 450.324 and 23 CFR § 450.326. These planning products must include a description of the performance measures and performance targets used in assessing the performance of the transportation system for transit asset management. State DOTs are also required to reference the performance targets and performance based plans into their new or amended planning documents on or after October 1, 2018, per 23 CFR § 450.216 and 23 CFR § 450.218. To date, these new TAM requirements have not been incorporated into several of the Pennsylvania MPO TIPs. In order to avoid any future delay in the approval of new or amended planning documents, FTA encourages the Pennsylvania Department of Transportation (PennDOT) and the MPOs to develop and incorporate these performance targets and plans into their new or amended planning documents on or after October 1, 2018.
7. The Keystone Corridor (Pennsylvania portion) is the in-State and commuter rail service funded by PennDOT and FTA on the Amtrak rail line that runs between Philadelphia and Harrisburg. Keystone Corridor projects are funded within the three contiguous large urbanized areas (UZAs) which includes Harrisburg, Lancaster, and Philadelphia. Per the Memorandum of Understanding between PennDOT, FTA, and FHWA for Pennsylvania's Statewide Procedures for 2019-2022 for STIP and TIP Revisions, the entire amount of federal funds applied to Keystone Corridor Projects shall be programmed on the TIP of the UZA from which the funds originate. FTA encourages PennDOT and the MPO that is located within the UZA from which the federal funds originate to reference any federal transit funds (that are used for capital projects on the Keystone Line) into their respective TIP.

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

1. FHWA and FTA commend PennDOT's development and continued utilization of the Transportation Investment Plan and Scorecard of Influence. PennDOT created these tools well in advance of FHWA issuing the final rules governing PBPP, TPM, and asset management. PennDOT had the vision to begin to implement these concepts in order to make the transition to a more data driven and analytical process. The purpose of the Transportation Investment Plan is to make ongoing assessments and to reevaluate the data associated with the transportation decision-making process by ensuring that each dollar invested is being directed in a fashion that meets a "strategic direction" and that enhances the overall "performance" of the Commonwealth's transportation system. The Investment Plan focuses on the following four priority areas: • Bridges on the National Highway System (NHS) • Roadway conditions on the NHS • Bridges on the remainder of the roadway system • Roadway conditions on the remainder of the system.
2. FHWA and FTA commend Secretary Richards, PennDOT, and Planning Partners for working to make transportation planning a more collaborative process that supports community goals through the PennDOT Connects policy. The PennDOT Connects initiative reaches into community and transportation planning processes to initiate early dialogue and partnered decision-making with regard to the kinds of transportation projects that will help a community achieve its vision. PennDOT Connects aims to ensure that community collaboration happens early, and that each project is considered in a holistic way for opportunities to improve safety, mobility, access, and environmental outcomes for all modes and local contexts. Specific areas to be brought to the table include safety issues; bicycle/pedestrian accommodations; transit access; stormwater management; utility issues; local and regional plans and studies; freight-generating land uses; and locally driven perspectives.
3. FHWA and FTA commend the Planning Partners in PennDOT District 8-0 as well as the District and Program Center staff for their forward-thinking efforts to enhance communication and collaboration in planning. This is exemplified through the South-Central PA MPO Environmental Justice (EJ) Study which is led by York MPO in concert with the region's other MPOs. The Study was launched in response to the 2017 STIP Planning Finding which identified the need for an improved Environmental Justice evaluation process. Another noteworthy example of enhanced collaboration is the CMP/HSIP Taskforce which is led by the District staff in close coordination with the region's MPOs. The Taskforce serves as a forum to discuss congestion management, traffic operations, and safety planning. FHWA and FTA commend PennDOT and the region's Planning Partners for their efforts and encourage other areas of the State to explore how they can adopt similar practices to enhance regional collaboration and communication.

4. FHWA commends PennDOT for synchronizing the State Freight Plan's Freight Investment Plan with the 2019-2022 Transportation Improvement Plan (TIP) update. This action demonstrates PennDOT's commitment to programming freight projects in every two-year STIP cycle utilizing the National Highway Freight Funds towards improving and maintaining the National Highway Freight Network.
5. FHWA commends PennDOT for forming and instituting the PennDOT Interstate Steering Committee (ISC). PennDOT formed an ISC to more efficiently manage the significant needs of the Statewide Interstate System. The ISC Workgroup contains representation from PennDOT's CPDM, the Bureau of Maintenance Operations (BOMO), the Bureau of Project Delivery (BPD), and the Districts. The ISC works with PennDOT, MPOs, RPOs, FHWA and State Transportation Commission (STC) on the development and management of the Interstate Program. They assist with project prioritization and re-evaluate projects during the STIP and TYP updates. The ISC Workgroup meets monthly to assist with the management of the IM Program.

As part of the 2019 STIP and TYP Update, the ISC-Workgroup worked with each District to provide Interstate presentations. The presentations were made in July 2017. Presentations provided updates on conditions, challenges, best practices and needs for each District. All presentations were available via web conference so other Districts, Planning Partners and FHWA could participate. In addition to the presentations, the ISC-Workgroup also held Interstate Rides. ISC Workgroup members, Central Office Asset Management and Planning staff, as well as, District staff rode all 2,740 miles of the Interstate System in May and June 2017. The District Interstate rides provided a statewide perspective of current conditions, as well as, an opportunity to review currently planned and potential projects. This information was summarized and shared with all the MPOs/RPOs at the October 2017 Annual Meeting. Throughout 2018, ISC members presented at MPO/RPO Committee Meeting to share information. PennDOT's efforts to prioritize and program projects for the Interstate System and share information and data with partners is commendable.