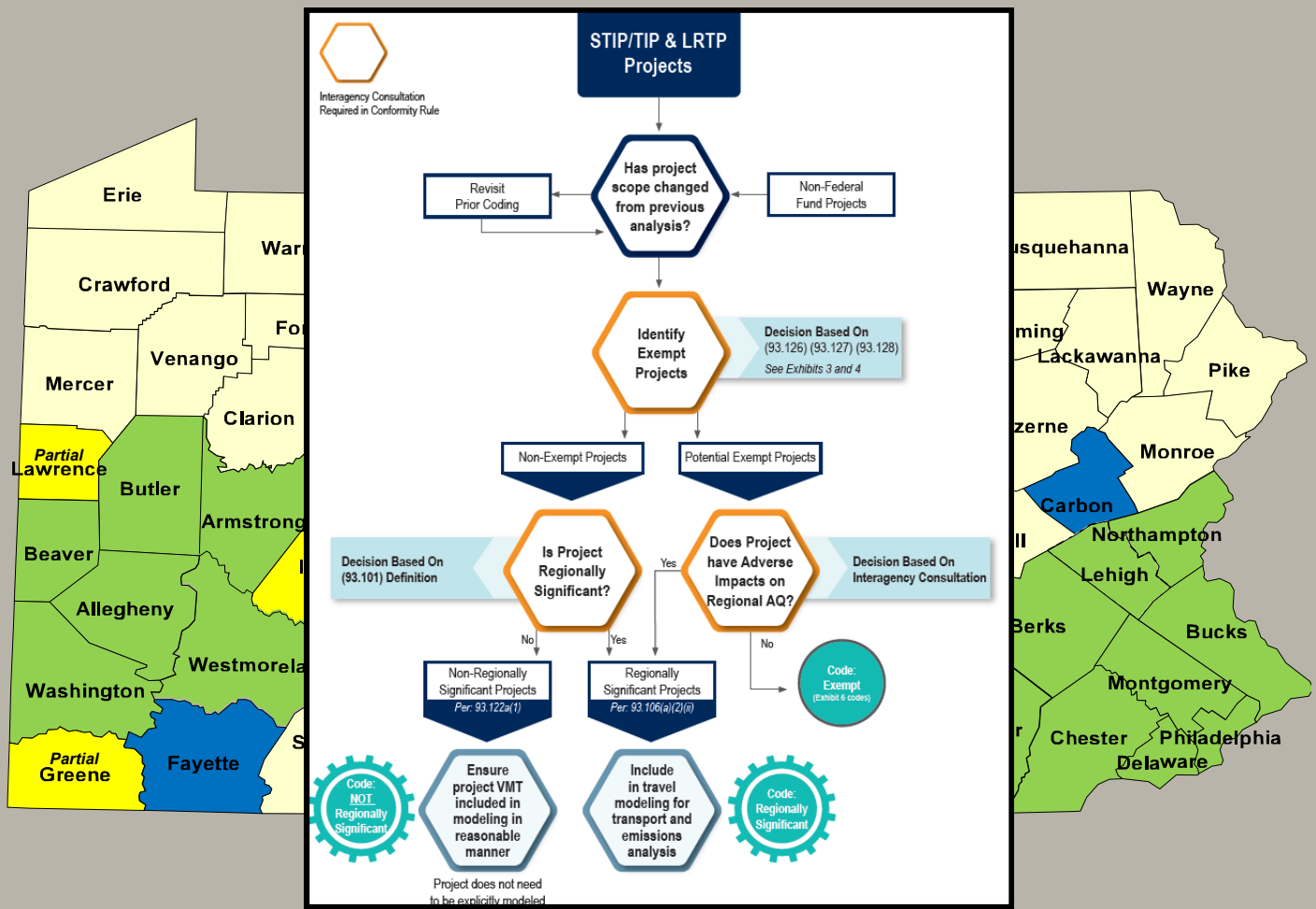


PENNDOT PROJECT REVIEW & CLASSIFICATION GUIDELINES FOR REGIONAL AIR QUALITY CONFORMITY



Acknowledgements

PennDOT thanks the Delaware Valley Regional Planning Commission, from which the air quality project codes and this process are derived, and FHWA, EPA and DEP for their assistance in developing these guidelines.

Author

Michael Baker International developed this Guide for PennDOT.

Disclaimer

The contents of this report reflect the views of the author(s), which is (are) responsible for the facts and accuracy of the data presented herein. The contents do not necessarily reflect the official views or policies of the Commonwealth of Pennsylvania, the United States Department of Transportation, or the Federal Highway Administration at the time of publication. This report does not constitute a standard, specification or regulation.

For more information:

Jackie Koons-Felion
Transportation Planning Manager
Pennsylvania Department of Transportation
Center for Program Development & Management
400 North Street, 6th Floor
Harrisburg, Pennsylvania 17120-0064

Phone: 717-787-6388

Email: jfelion@pa.gov

Website: www.dot.state.pa.us/

TABLE OF CONTENTS

Overview	1
Introduction.....	1
Applicability.....	1
Steps in Project Review and Coding Process.....	2
Agency Responsibilities	3
MPO / RPO Responsibilities	3
PennDOT District Offices	6
PennDOT Central Office.....	6
Local Air Agencies	6
DEP.....	6
EPA.....	6
FHWA and FTA	6
Definitions	7
Regionally Significant Projects	7
Non-Regionally Significant Projects.....	7
Exempt Projects	7
Non-Exempt Projects.....	7
Process for Determining Regional Conformity Status	11
1. Identification of Exempt Projects.....	11
2. Identification of Non-Exempt Projects that are Not Regionally Significant	12
3. Identification of Regionally Significant Projects.....	12
MPMS Coding	12
List of Exhibits	
Exhibit 1: Scenario 1 vs. Scenario 2 MPO/RPO Designations.....	4
Exhibit 2a: Roles and Responsibilities for Scenario 1 Agency Conformity Analyses.....	5
Exhibit 2b: Roles and Responsibilities for Scenario 2 Agency Conformity Analyses.....	5
Exhibit 3: Exempt Project Types (40 CFR 93.126).....	8
Exhibit 4: Exempt Project Types (40 CFR 93.127).....	9
Exhibit 5: Project Classification Process Flow Chart	14
Exhibit 6: Air Quality Exempt Codes for Projects in TIP and LRPT	15
Exhibit 6: Air Quality Exempt Codes for Projects in TIP and LRPT (continued).....	16
Exhibit 7: MPMS Air Quality Screen Image	17
Attachment A: Nonattainment Maps	
Exhibit A1: Areas Requiring Transportation Conformity in Pennsylvania	18
Attachment B: Record of Changes to Document	
Exhibit B1: History of Changes Made to Document	19

This page intentionally left blank

OVERVIEW

Introduction

This Air Quality Project Review and Classification Process outlines an approach and roles for Pennsylvania local, state and federal transportation/air quality partners in classifying transportation projects to determine that each is properly accounted for in the regional transportation conformity determinations.

Transportation Improvement Programs (TIPs) and Long Range Transportation Plans (LRTPs) for areas in maintenance or nonattainment of certain National Ambient Air Quality Standards (NAAQS) are required to demonstrate regional transportation-air quality conformity to the State Implementation Plan (SIP). In Pennsylvania, new TIPs are generally created biennially, following the State's 12-Year Program update process. New LRTPs are created on an alternate schedule determined by the Metropolitan Planning Organization (MPOs) or Rural Planning Organization (RPO). Both TIPs and LRTPs must meet multiple state and federal requirements. Amendments to an area's TIP and LRTP may occur as necessary, and depending on the project changes, may also require a conformity determination. The regional conformity requirement is separate and apart from any conformity requirements that apply to specific projects.

The pollutants for which regional transportation air quality conformity is performed are ozone, fine particulates ($PM_{2.5}$), coarse particulates (PM_{10}) and carbon monoxide (CO). The process demonstrates that the TIP and LRTP "conform to" the State Implementation Plan (SIP) for the relevant pollutants (or in the absence of a SIP, EPA regulations provide for other tests). Regional transportation air quality conformity is required by the Clean Air Act and the U.S. EPA's Transportation Conformity regulations (93 CFR Parts 51 and 93). Federal approval of each TIP, and therefore the flow of federal funds, is contingent upon an affirmative conformity determination in all areas subject to this requirement.

Federal regulations governing the conformity analysis and process require that each project on the

TIP and LRTP be screened to identify regionally significant, non-exempt projects, which must be reflected in the conformity analysis. The decision on project exempt and/or regional significance status must include an interagency consultation process including federal, state and local transportation and air quality partners.

Applicability

This Project Review and Classification Process is applicable to the conformity analyses and determinations for new or amended TIP and LRTP adoptions in Pennsylvania.

This process is not directly applicable to air quality conformity analyses and determinations for project-level conformity, which is required for projects in maintenance or nonattainment areas for $PM_{2.5}$, PM_{10} and CO. Project-level screening and analysis are addressed in separate PennDOT guidance documents, though portions of this process may be applicable. See PennDOT Publication #321 – Project Level Air Quality Handbook (as updated) for further information on project-level processes and requirements.

At a minimum, PennDOT and the MPOs/RPOs responsible for regional transportation air quality conformity activities will implement these process guidelines. MPOs/RPOs may implement additional steps and record keeping consistent with local practices and with 40 CFR Part 93 and the Pennsylvania Conformity SIP¹.

¹ The latest Transportation Conformity SIP was submitted to EPA on May 29, 2008 and was approved by EPA on April 29, 2009, becoming effective on June 29, 2009. Pennsylvania has implemented, in practice, all federal requirements and options as encompassed by this SIP, as federal law and regulations require.

Steps in Project Review and Air Quality Coding Process

Step	Action and Responsible Agency
1	<p>MPO/RPO, PennDOT District, and Program Center Offices identify all projects on the TIP and LRTP. Any projects not on the TIP or LRTP should also be identified with sufficient information (e.g. project description) to support project evaluation.</p> <p>Key Issues:</p> <ul style="list-style-type: none"> • PennDOT Districts will need to identify existing TIP projects that have undergone significant scope changes. New project descriptions may need to be assembled for those projects. • PennDOT Central and District Offices will assist in identifying key non-federal transportation projects that may <u>not</u> be in the Multi-Modal Project Management (MPMS) system. • Local agencies may also need to be contacted to identify and share information on non-federal transportation projects. • MPOs/RPOs will need to identify all projects that are identified in the fiscally-constrained portion of the LRTP. Studies should not be included in the conformity analyses. • MPOs, RPOs and PennDOT Central / District Offices must obtain transit information directly from the transit agency.
2	<p>MPOs/RPOs, in conjunction with the PennDOT District and Program Center Offices, review the project listing and provides initial coding for all projects (specific agency roles may vary by area- see next section). Previously coded projects are reviewed for changes in project design scope which may change the prior coding. The District Office enters the coding into the MPMS system. This coded list, along with any list of transportation projects not on the TIP and Plan, is forwarded to the PennDOT Air Quality/Federal Initiatives Section.</p> <p>Key Issues:</p> <ul style="list-style-type: none"> • For air quality conformity coding purposes, it is essential that any new or revised project names and descriptions clearly reflect the project type and whether road capacity is expected to be affected. This is important for assigning air quality exempt codes.
3	<p>PennDOT Air Quality/Federal Initiatives Section reviews the coding and may consult with the District Office and the MPO/RPO, and then forwards the coded listing to DEP, FHWA, FTA and EPA. Each of these agencies reviews the list and coding, and voices any needs for clarification within a 2-week time frame to the PennDOT AQ/Federal Initiatives Section.</p> <p>Key Issues:</p> <ul style="list-style-type: none"> • To assist federal agency review, PennDOT or the MPO/RPO may be required to provide additional project descriptions (beyond those within the MPMS system). These project descriptions will assist the federal agencies in evaluating project exempt and regional significance coding. • LRTP and non-federal transportation projects that are not listed in MPMS will be provided in alternative formats. • PennDOT's Air Quality SharePoint site will be used to support the consultation process. The SharePoint will be used for each biennial TIP cycle and optionally for MPO/RPO LRTP updates and other TIP amendments.
4	<p>If clarifications are requested in Step 3, the PennDOT AQ/Federal Initiatives Section will research the issue with the appropriate party and provide that information to all agencies via the Air Quality SharePoint site or email. Alternatively, PennDOT may schedule a conference call or meeting among the parties to obtain the necessary information and make a recommendation regarding the coding. If there are no questions from Step 3, this step may be omitted.</p>
5	<p>Based on all information to-date, the PennDOT AQ/Federal Initiatives Section (for Scenario 1 Agencies) finalizes decisions regarding project air quality coding, codes any changes to the MPMS system, and informs all relevant parties of the decisions and relevant supporting rationale via the Air Quality SharePoint site or email. Codes in MPMS are finalized by District Office personnel. Scenario 2 agencies finalize their own air quality coding with support from PennDOT.</p>

AGENCY RESPONSIBILITIES

Agencies participating in the project screening and classification process include:

Regional Agencies:

- Metropolitan Planning Organizations (MPOs)
- Rural Planning Organizations (RPOs)

State Agencies:

- Pennsylvania Department of Environmental Protection
- PennDOT District Offices
- PennDOT Central Office

Federal Agencies:

- Federal Highway Administration, PA Division
- Federal Transit Administration, Region III
- U.S. Environmental Protection Agency, Region III

Other:

- Allegheny County Health Department
- Philadelphia Air Management Services
- Other governmental agencies, as may be relevant to a particular project, TIP, Plan or nonattainment or maintenance area.

MPO/RPO

Pennsylvania regional agency responsibilities for the transportation air quality conformity process are differentiated based on the regional MPO or RPO designation as a Scenario 1 or Scenario 2 Agency in the Pennsylvania Air Quality Conformity SIP.

Exhibit 1 provides a map illustrating the MPO designations.

Scenario 1 Agencies

Scenario 1 agencies are those which do not perform air quality conformity modeling themselves, and for which PennDOT performs the conformity analysis on the planning partner's behalf. Any county or part thereof that is not a Scenario 2 agency is a Scenario 1 agency.

Scenario 1 agencies work closely with the PennDOT District staff to identify and provide initial air quality coding for each TIP and LRTP project. Project coding is then reviewed with PennDOT Central Office and other state and federal agencies prior to finalization by PennDOT Central Office. Any projects not on the TIP or LRTP should also be provided for review with sufficient information (e.g. project description) to support project evaluation. PennDOT Central Office then uses this information in

the transportation and emissions modeling analyses required for the conformity analysis, and compiles the Air Quality Conformity Report for the Scenario 1 agency's use in its public comment period and final local agency consideration and approval.

Scenario 2 Agencies

Scenario 2 agencies are those which have travel demand models and perform their own air quality analyses. Scenario 2 agencies include the MPOs for Berks County, Harrisburg (Cumberland, Dauphin, Perry Counties.), Lancaster County, Lehigh Valley (Northampton and Lehigh Counties.), Philadelphia (Bucks, Chester, Delaware, Montgomery and Philadelphia Counties.), Pittsburgh (Armstrong, Allegheny, Beaver, Butler, Fayette, Lawrence, Greene, Indiana, Washington and Westmoreland Counties), and York County.

Scenario 2 agencies work closely with PennDOT District staff to develop the listing of projects to be on the TIP or LRTP. Air quality coding determination is typically performed largely by the MPO, in consultation with PennDOT District staff. Projects and their codes are then reviewed with PennDOT Central Office and other state and federal agencies prior to finalization by the MPO and use in its travel and emissions modeling processes. Some agencies may include additional local parties in the project review and classification process. Any projects not on the TIP or LRTP should also be provided for review with sufficient information (e.g. project description) to support project evaluation.

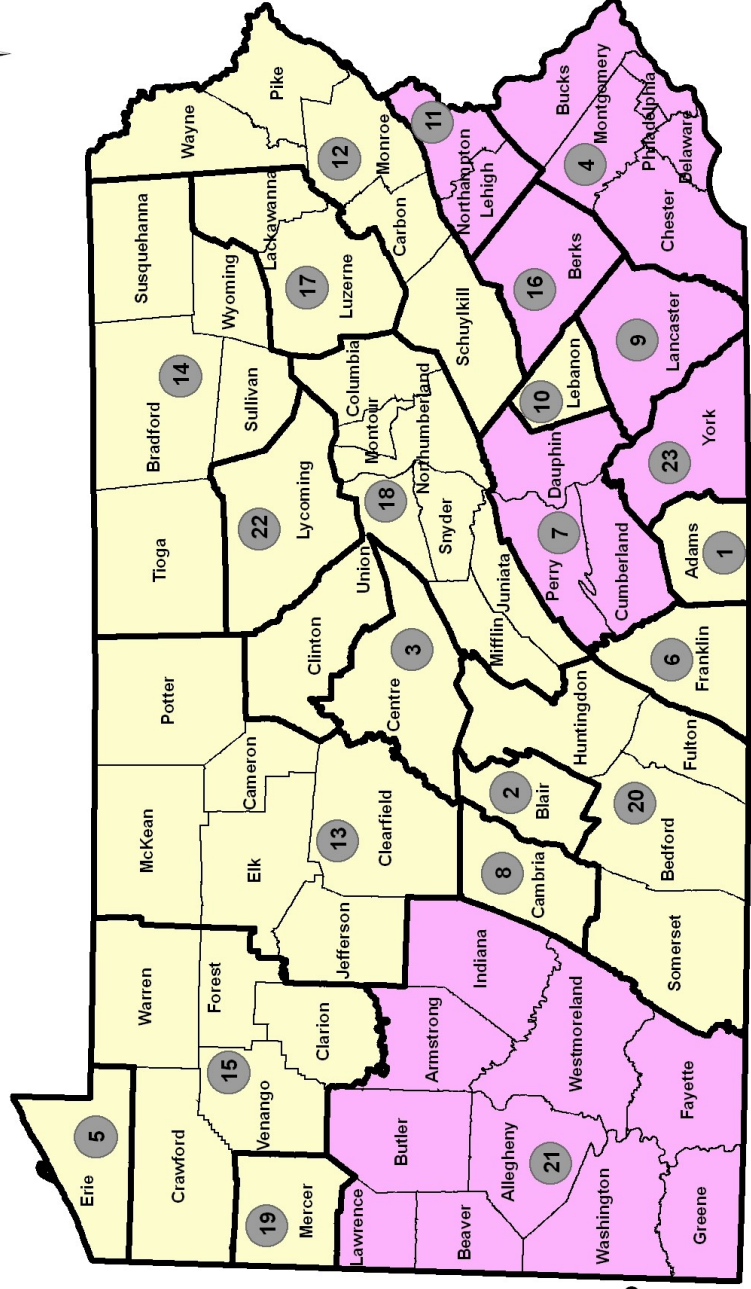
Scenario 2 agencies also perform the emissions analysis, write the Air Quality Conformity Report, provide for public input, and obtain agency approval of the determination. Conformity for nonattainment and maintenance areas encompassing both Scenario 1 and Scenario 2 agencies (multiple MPOs/RPOs) are assisted by PennDOT.

The project identification and classification responsibilities are summarized in **Exhibit 2A** (Scenario 1 Agencies) and **Exhibit 2B** (Scenario 2 Agencies).

Exhibit 1: Scenario 1 vs Scenario 2 MPO/RPO Designations

**PENNSYLVANIA'S TRANSPORTATION PLANNING ORGANIZATIONS
RURAL AND METROPOLITAN AREAS**

Scenario 1 vs. Scenario 2



- Legend**
- Scenario 1 Agencies
 - Scenario 2 Agencies
 - 1 - Adams RPO
 - 2 - Altoona MPO
 - 3 - Centre MPO
 - 4 - DVRPC MPO
 - 5 - Erie MPO
 - 6 - Franklin Non-Affiliated
 - 7 - Harrisburg MPO
 - 8 - Johnstown MPO
 - 9 - Lancaster MPO
 - 10 - Lebanon MPO
 - 11 - Lehigh Valley MPO
 - 12 - NEPA RPO
 - 13 - North Central RPO
 - 14 - Northern Tier RPO
 - 15 - Northwest RPO
 - 16 - Reading MPO
 - 17 - Scranton-Wilkes Barre MPO
 - 18 - SEDA COG RPO
 - 19 - Shenango Valley MPO
 - 20 - Southern Alleghenies RPO
 - 21 - SPC MPO
 - 22 - Williamsport MPO
 - 23 - York MPO

MPO (Metropolitan Planning Organization)
RPO (Rural Planning Organization)

Exhibit 2a: Roles and Responsibilities for Scenario 1 Agencies

Process Step	1	2	3	4	5
Role →	Identify Projects	Initial Project Coding	Review Coding	Consultation	Finalize Project Coding
Agency ↓					
Scenario 1 MPO/RPO	X	X <i>(involve where appropriate)</i>		X	
Adjacent MPO/RPO				X	
PennDOT District AQ Coordinator	X	X		X	
PennDOT Central Office			X	X	X
DEP				X	
FHWA/FTA				X	
EPA				X	

Exhibit 2b: Roles and Responsibilities for Scenario 2 Agencies

Process Step	1	2	3	4	5
Role →	Identify Projects	Initial Project Coding	Review Coding	Consultation	Finalize Project Coding
Agency ↓					
Scenario 2 MPO/RPO	X	X		X	X
Adjacent MPO/RPO				X	
PennDOT District AQ Coordinator	X	X		X	
PennDOT Central Office			X	X	
DEP				X	
FHWA/FTA				X	
EPA				X	

PennDOT District Office

These offices provide key support in the development of the project lists that comprise the TIP and LRTP, and have direct access to the details of the majority of projects, as they are PennDOT-sponsored projects. District personnel are most involved in coding projects with Scenario 1 and smaller Scenario 2 agencies. For Scenario 1 MPOs/RPOs, District staff (as designated) will take the lead role in the initial air quality coding determination of many or most projects. For Scenario 2 MPOs, the District staff will provide information and consultation to the MPO and PennDOT, and answer questions from other agencies regarding projects.

For all areas, District staff are responsible for entering the regional air quality coding into the MPMS system for each project. In addition, they will assist in identifying transportation projects not on the TIP or LRTP to the AQ/Federal Initiatives Section in Central Office and the MPOs.

PennDOT Central Office

Central Office staff in the Air Quality/Federal Initiatives Section provide overall management of the regional air quality conformity process in coordination with other staff in the Center for Program Development and Management (particularly the MPO/RPO Coordinators). AQ/Federal Initiatives Section staff review air quality project listings and the coding for each project, and manage the consultation among all agencies on the finalization of the coding. Section staff will:

- Answer questions regarding the coding process and definitions and notations to be used. Clarification of project details should be directed to those most knowledgeable regarding the particular project, including the applicable Central Office MPO/RPO representative.
- Produce the conformity analyses and the determination report for Scenario 1 agencies.
- Provide liaison and technical assistance to Scenario 2 agencies in their performance of the conformity analysis and drafting a report.
- Receive and review all conformity reports from all local agencies.
- Submit the reports to FHWA (2 copies) and FTA (1 copy) for federal review and approvals. FHWA will be responsible for providing locally

adopted reports/analysis to EPA.

- Maintain liaison with all agencies from initiation of each conformity process through final FHWA/FTA approval.

Central Office and District Office staff are responsible for ensuring the project coding is entered into the MPMS system.

Local Air Quality Agencies

*Allegheny County Health Department
Philadelphia Air Management Services*

These agencies may consult with the PennDOT District and MPO personnel in reviewing conformity documentation, and may be consulted throughout the process per local procedures.

DEP

DEP's Office of Mobile Sources (Waste, Air and Radiation Management, Bureau of Air Quality, Division of Air Resource Management) is consulted throughout the planning for and implementation of the overall conformity process, and reviews the proposed air quality coding of each project prior to the initiation of transportation and emissions analyses. DEP also reviews the conformity determination report and provides input to the local agency, PennDOT Central Office and EPA, FHWA and FTA on the proposed determination.

EPA

EPA is consulted throughout the process, and reviews the proposed air quality coding of each project prior to commencement of the transportation and air quality analyses. EPA also reviews the conformity determination report and provides input to FHWA/FTA on the suitability of the local agency's determination.

FHWA and FTA

FHWA and FTA are consulted throughout the process, and each reviews the proposed air quality coding of each project prior to commencement of the transportation and air quality conformity analyses. FHWA and FTA review the conformity determination report and input from EPA and any other agencies, and makes the federal approval determination.

DEFINITIONS

Projects must be classified as to their regional significance and exempt status. All regionally significant, non-exempt projects must be included in the regional conformity analysis. Projects that are not regionally significant are generally not included in the analysis (there are special cases where this may not be the case) and projects that are exempt are not generally included in the analysis (there are special cases where this may not be the case). Further, it may be the local practice to include certain types of projects in the analysis (i.e., all transit bus replacements, all travel demand management projects) regardless of their classification. Key definitions pertaining to the air quality coding of transportation projects are:

Regionally Significant Projects (40 CFR 93.101)

A transportation project (other than an exempt project) that is on a facility which serves regional transportation needs (such as access to and from the area outside of the region, major activity centers in the region, major planned developments such as new retail malls, sports complexes, etc., or transportation terminals as well as most terminals themselves) and would normally be included in the modeling of a metropolitan area's transportation network, including at a minimum all principal arterial highways and all fixed guideway transit facilities that offer an alternative to regional highway travel.

Non-Regionally Significant Projects

A project not defined as regionally significant in 40 CFR 93.101.

Exempt Projects

Projects of the types listed in Table 2 of 40 CFR 93.126 (see **Exhibit 3**), except in cases where the MPO (Scenario 2 agency) or PennDOT/MPO (Scenario 1 agency), in consultation with other agencies, EPA and FHWA (in the case of highway projects) or FTA (in the case of a transit project) concur that the project has potentially adverse emissions impacts for any reason. (see 93.105(c)(1)(iii))

Highway and transit projects of the types listed in

Table 3 of 40 CFR 93.127 (see **Exhibit 4**) are exempt from regional emissions analysis requirements. The local effects of these projects with respect to CO concentrations must be considered to determine if a hot-spot analysis is required prior to making a project-level conformity determination. The local effects of projects with respect to PM₁₀ and PM_{2.5} concentrations must be considered and a hot-spot analysis performed prior to making a project-level conformity determination, if a project in Table 3 also meets the criteria in § 93.123(b)(1) [pertaining to project level hot spot analyses]. These projects may then proceed to the project development process even in the absence of a conforming transportation plan and TIP. A particular action of the type listed in Table 3 of 40 CFR 93.127 is not exempt from regional emissions analysis if the MPO in consultation with other agencies, EPA, and FHWA (in the case of a highway project) or FTA (in the case of a transit project) concur that it has potential regional impacts for any reason. (see 93.105(c)(1)(iii)).

Traffic signal synchronization projects (per 40 CFR 93.128) may be approved, funded, and implemented without satisfying the requirements of this subpart [regional conformity analyses]. However, all subsequent regional emissions analyses required for transportation TIPs/LRTPs must include such regionally significant traffic signal synchronization projects. In short, traffic signal synchronization projects are exempted from the first regional conformity analysis from which they would otherwise be included, but the project must be included in all subsequent analyses.

Non-Exempt Projects

A project not otherwise classified as exempt per 40 CFR 93.126, 127 or 128.

Exhibit 3: Exempt Project Types (40 CFR 93.126)

TABLE 2 from 40 CFR 93.126

Safety		
<ul style="list-style-type: none"> ▪ Railroad/highway crossing. ▪ Projects that correct, improve, or eliminate a hazardous location or feature. ▪ Safer non-Federal-aid system roads. ▪ Shoulder improvements. ▪ Increasing sight distance. ▪ Highway safety improvement program implementation. ▪ Traffic control devices and operating assistance 	<ul style="list-style-type: none"> other than signalization projects. ▪ Railroad/highway crossing warning devices. ▪ Guardrails, median barriers, crash cushions. ▪ Pavement resurfacing and/or rehabilitation. ▪ Pavement marking. ▪ Emergency relief (23 U.S.C. 125). ▪ Fencing. ▪ Skid treatments. 	<ul style="list-style-type: none"> ▪ Safety roadside rest areas. ▪ Adding medians. ▪ Truck climbing lanes outside the urbanized area. ▪ Lighting improvements. ▪ Widening narrow pavements or reconstructing bridges (no additional travel lanes). ▪ Emergency truck pullovers.
Mass Transit		
<ul style="list-style-type: none"> ▪ Operating assistance to transit agencies. ▪ Purchase of support vehicles. ▪ Rehabilitation of transit vehicles¹. ▪ Purchase of office, shop, and operating equipment for existing facilities. ▪ Purchase of operating equipment for vehicles (e.g., radios, fareboxes, lifts, etc.). ▪ Construction or renovation of power, 	<ul style="list-style-type: none"> signal, and communications systems. ▪ Construction of small passenger shelters and information kiosks. ▪ Reconstruction or renovation of transit buildings and structures (e.g., rail or bus buildings, storage and maintenance facilities, stations, terminals, and ancillary structures). 	<ul style="list-style-type: none"> ▪ Rehabilitation or reconstruction of track structures, track, and trackbed in existing rights-of-way. ▪ Purchase of new buses and rail cars to replace existing vehicles or for minor expansions of the fleet¹. ▪ Construction of new bus or rail storage/ maintenance facilities categorically excluded in 23 CFR part 771.
Air Quality		
<ul style="list-style-type: none"> ▪ Continuation of ride-sharing and van-pooling promotion activities at current levels. ▪ Bicycle and pedestrian facilities. 		
Other		
<ul style="list-style-type: none"> ▪ Specific activities which do not involve or lead directly to construction, such as: <ul style="list-style-type: none"> – Planning and technical studies. – Grants for training and research programs. ▪ Engineering to assess social, economic, and environmental effects of the proposed action or alternatives to that action. ▪ Noise attenuation. ▪ Emergency or hardship advance land acquisitions (23 CFR 710.503). ▪ Acquisition of scenic easements. ▪ Plantings, landscaping, etc. ▪ Sign removal. 		
<ul style="list-style-type: none"> – Planning activities conducted pursuant to titles 23 and 49 U.S.C. – Federal-aid systems revisions. ▪ Directional and informational signs. ▪ Transportation enhancement activities (except rehabilitation and operation of historic transportation buildings, structures, or facilities). ▪ Repair of damage caused by natural disasters, civil unrest, or terrorist acts, except projects involving substantial functional, locational or capacity changes. 		

¹ In PM₁₀ and PM_{2.5} noattainment or maintenance areas, such projects are exempt only if they are in compliance with control measures in the applicable implementation plan.

Exhibit 4: Exempt Project Types (40 CFR 93.127)

**TABLE 3 from 40 CFR 93.127
Projects Exempt from Regional Emissions Analyses**

- Intersection channelization projects.
- Intersection signalization projects at individual intersections.
- Interchange reconfiguration projects.
- Changes in vertical and horizontal alignment.
- Truck size and weight inspection stations.
- Bus terminals and transfer points.

This page intentionally left blank

PROCESS TO DETERMINE PROJECT STATUS

After compiling projects lists and determining any project scope changes, projects should be classified as one of the following.

- Exempt
- Non-Exempt: Regionally Significant
- Non-Exempt: Not Regionally Significant

The final determination of project status will require interagency consultation and review, following **Exhibit 2A** (Scenario 1 agencies) or **Exhibit 2B** (Scenario 2 agencies).

Exhibit 5 illustrates the process for conducting a project review and determining the project significance and exempt status. The process involves the following steps by each participant in the coding process:

1. Identification of Exempt Projects

Highway and transit projects that are classified as exempt do not need to be included in the transportation conformity analysis and determination (unless they will have an adverse impact on air quality). Since the project is exempt from an air quality analysis, it can be concluded that the project will not significantly impact air quality nor will cause or contribute to an exceedance of the National Ambient Air Quality Standards for the applicable pollutants. These projects may proceed toward implementation even in the absence of a conforming transportation TIP and/or LRTP.

The transportation rule provides a list of exempt projects in CFR 93.126, CFR 93.127, and CFR 93.128 (as illustrated in **Exhibit 3** and **Exhibit 4**). To facilitate project record keeping and review via interagency consultation, each exempt project is to be assigned a category code consisting of a letter to indicate its grouping (e.g. “S” for safety, “M” for Mass Transit) and a number indicating the reason for the coding. **Exhibit 6** provides the project coding system will be used for the TIP and 12-Year Program regional conformity determinations. For example, a safety project involving an increase in sight distance would be coded as “S5”). Coding for

most projects should be expedient, as the project list description is self-evident for most projects (i.e., ‘bridge replacement’), as District staff, MPO/RPO Coordinators and MPO/RPO personnel each has significant knowledge of most project’s parameters and has project details readily available. It is possible that some projects may fit multiple exemption type categories. In these cases, a single primary exemption type should be specified and provided as input to the MPMS system. If desired, MPOs may have separate tracking procedures that record all applicable exemption codes related to each project.

LRTP projects not in MPMS (i.e. outside the timeframe of the 12-year program) may be addressed in a more simplified manner by listing the exempt projects that are part of the fiscally-constrained LRTP.

Exempt Project Clarification

In 2017, EPA (in consultation with FHWA) clarified its interpretations of exempt projects in an effort to ensure national consistency in how transportation conformity requirements are implemented:

Road diets: Are exempt under 40 CFR 93.126, Table 2, Exempt Projects. If a road diet is part of a state’s Highway Safety Improvement Program, the road diet is exempt under the item, “Highway Safety Improvement Program implementation.” If not, a road diet could be still be exempt under the item, “Projects that correct, improve, or eliminate a hazardous location or feature.”

Auxiliary lanes: If an auxiliary lane is less than 1 mile in length, it can be considered exempt under 40 CFR 93.126, Table 2, as “Projects that correct, improve, or eliminate a hazardous location or feature.”

Ramp metering: Ramp metering projects are also exempt, under 40 CFR 93.126, Table 2, as “Projects that correct, improve, or eliminate a hazardous location or feature.”

The conformity rule (CFR 93.105c(1)(iii)) identifies

that interagency consultation shall be used to evaluate whether projects otherwise exempted from meeting the requirements of subparts 93.126 and 93.127 should be treated as non-exempt regionally significant in cases where potential adverse emissions impacts may exist for any reason. It is anticipated that such cases will be rare. Specific criteria are not provided in the conformity rule, thus the interagency consultation partners will be responsible for identifying such projects.

2. Identification of Non-Exempt Projects That are Not Regionally Significant

There are several options for handling projects that are determined to be non-exempt, but not of regional significance per the definitions in 93.101. Such projects will often include capacity-enhancing projects on lower facility types or modifications to roadways not included in the regional travel demand model. Potential “not regionally significant” projects should be identified as such and shared with the interagency consultation group.

The party responsible for completing the conformity analysis can then choose one of the following options:

- a. Include and list these projects in the conformity analysis. If the model or analysis techniques include sufficient detail, the projects can be explicitly modeled and the impacts considered in the emissions analyses. As long as these projects are identified as being “not regionally significant” and the interagency consultation partners concur, such projects will not be impacted by a conformity lapse or freeze. MPOs typically code most projects into their transportation demand model, where possible, except those on local/collector roadways.
- b. Not include the projects explicitly in the conformity analysis. However, the conformity rule does indicate that the emissions portion of the conformity analysis account for any potential VMT changes caused by the project (i.e., use of simplified methods or off-model techniques or procedures). This approach appears most applicable when the project is of a type not typically coded in the local regional travel

demand model, such as a project on a collector or local roadway or a transit bus route change.

Special Considerations

The conformity guidance does not provide specific guidance on classifying non-exempt projects as “Not Regionally Significant”. Through this document, the ICG has determined specific recommendations for defined project types. These recommendations will be enhanced and updated in future document revisions. These include:

- a. Roundabouts: FHWA has determined that roundabouts should not be listed as exempt projects. However, some roundabouts may be considered “Not Regionally Significant”. A project meeting all of the following attributes can be classified as “Not Regionally Significant”
 - Not on a 1-3 digit US or PA state highway
 - Has low traffic volume (<5,000 AADT)
 - No change in number of lanes
 - Single intersection improvement

3. Identification of Regionally Significant Projects

Projects that are considered regionally significant (or are typically included in the region’s travel demand model) must be included in the conformity determination and included in any transportation and emissions modeling conducted for the region. The project completion schedule, design concept and scope should be correctly reflected in the transportation plan and program. Projects should be coded as “Regionally Significant”.

MPMS Coding

The MPMS air quality screen has been modified to include a box in which to code a project as Not Applicable, Exempt, Not Regionally Significant, or Regionally Significant for regional air quality conformity. The box uses a drop-down menu with these choices. A second box accepts text for the coding of the type of exempt project per **Exhibit 6**. A screen image is provided in **Exhibit 7**.

Code a project as follows using **Exhibit 5** and the definitions:

Not-Applicable if it is located in an area in attainment of ozone, PM_{2.5} and PM₁₀ air quality standards (not in maintenance for any of these pollutants). The “Exempt Code” box is left blank.

Exempt if it is located in a nonattainment or maintenance area, and meets the definitions for an exempt project type. Insert a code from **Exhibit 6** in the “Exempt Code” box. No further coding is necessary.

Significant if the project meets the definitions for regionally significant and is non-exempt. No further coding is necessary. If a project was originally determined to be “Exempt” per the conformity reference tables and later changed to “Significant” per consultation, then the final coding of the project should be only “Significant”.

Non-Significant if the project is non-exempt and not regionally significant. No further coding is necessary.

For regional conformity purposes, a printout of the TIP and LRTP project lists should include the values in both the Status and Exempt Code boxes.

Coding for projects not in the MPMS system may be written onto a table or listing of these projects that should include, at a minimum, the MPMS number, name, short description, responsible party (i.e., MPO, county, city, private party), years funding will be obligated, Regional Conformity Status (Blank, Significant, Not Significant, Exempt, or Not Applicable), and Exempt code (if an exempt project).

Exhibit 5: Project Classification Process Flow Chart



Interagency Consultation
Required in Conformity Rule

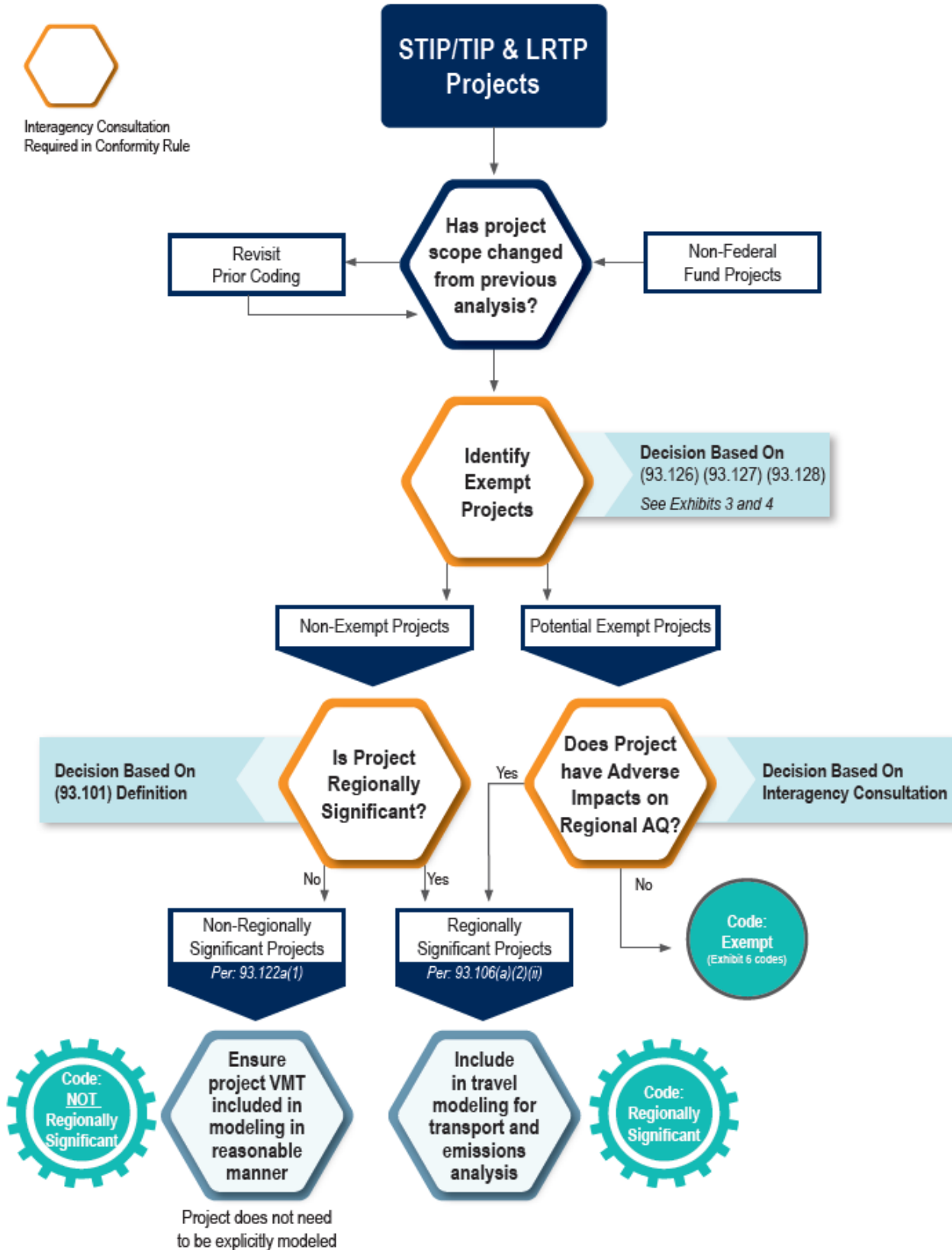


Exhibit 6: Air Quality Exempt Codes for Projects in TIP and LRPT

	Exempt Project Category ¹	AQ Code
Mass Transit Projects	Operating assistance to transit agencies	M1
	Purchase of support vehicles	M2
	Rehabilitation of transit vehicles ²	M3
	Purchase of office, shop and operating equipment for existing facilities	M4
	Purchase of operating equipment for vehicles (e.g., radios, fareboxes, lifts, etc.)	M5
	Construction or renovation of power, signal, and communications systems	M6
	Construction of small passenger shelters and information kiosks	M7
	Reconstruction or renovation of transit buildings and structures	M8
	Rehabilitation or reconstruction of track structures, track, and trackbed in existing rights-of-way	M9
	Purchase of new buses and rail cars to replace existing vehicles or for minor expansions of the fleet	M10
	Construction of new bus or rail storage/maintenance facilities categorically excluded in 23 CFR part 771	M11

Note: ¹ 40 CFR 93 Sections 126 and 127.

² In PM₁₀ non-attainment or maintenance areas, such projects are exempt only if they are in compliance with control measures in the applicable implementation plan.

	Exempt Project Category ¹	AQ Code
Safety Projects	Railroad/highway crossing	S1
	Projects that correct, improve, or eliminate a hazardous location or feature	S2
	Safer non-Federal-aid system roads	S3
	Shoulder improvements	S4
	Increasing sight distance	S5
	Highway safety improvement program implementation	S6
	Traffic control device and operating assistance other than signalization projects	S7
	Railroad/highway crossing warning devices	S8
	Guardrails, median barriers, crash cushions	S9
	Pavement resurfacing and/or rehabilitation	S10
	Pavement marking	S11
	Emergency relief (23 U.S.C. 125)	S12
	Fencing	S13
	Skid treatments	S14
	Safety roadside rest areas	S15
	Adding medians	S16
	Truck climbing lanes outside the urbanized area	S17
	Lighting improvements	S18
	Widening narrow pavements or reconstructing bridges (no additional travel lanes)	S19
	Emergency truck pullovers	S20

Exhibit 6: Air Quality Exempt Codes for Projects in TIP and LRPT (continued)

	Repair of damage caused by natural disasters, civil unrest, or terrorist acts, except projects involving substantial functional, locational, or capacity changes	X13
	Exempt Project Category¹	AQ Code
No Regional Emissions Analysis Required	Intersection channelization projects <i>Channelized intersections use pavement markings or raised islands to designate vehicle paths, helping to direct drivers to and through an intersection.</i>	R1
	Intersection signalization projects at individual intersections	R2
	Interchange reconfiguration projects	R3
	Changes in vertical and horizontal alignment	R4
	Truck size and weight inspection stations	R5
	Bus terminals and transfer points	R6
	Study & Development Project Category	AQ Code
Study	A project study with no programmed construction costs even if resulting project is likely to be non-exempt	SDY

Note: 140 CFR 93 Sections 126 and 127.

	Exempt Project Category¹	AQ Code
Air Quality Projects	Continuation of ride-sharing and van-pooling promotion activities at current levels	A1
	Bicycle and pedestrian facilities	A2
Others	Specific activities which do not involve or lead directly to construction, such as: Planning and technical studies Grants for training and research programs	X1
	Planning activities conducted pursuant to title 23 and 49 U.S.C.	X2
	Federal-aid systems revisions	X3
	Engineering to assess social, economic, and environmental effects of the proposed action or alternatives to that action	X4
	Noise attenuation	X5
	Advance land acquisitions (23 CFR 712 or 23 CFR 771)	X6
	Acquisition of scenic easements	X7
	Plantings, landscaping, etc.	X8
	Sign removal	X9
	Directional and informational signs	X10
	Transportation enhancement activities (except rehabilitation and operation of historic transportation buildings, structures, or facilities)	X11

Exhibit 7: MPMS Air Quality Screen

Regional Conformity Determination

Conformity Status Code

Significant

Exempt

Non-Applicable

Non-Significant

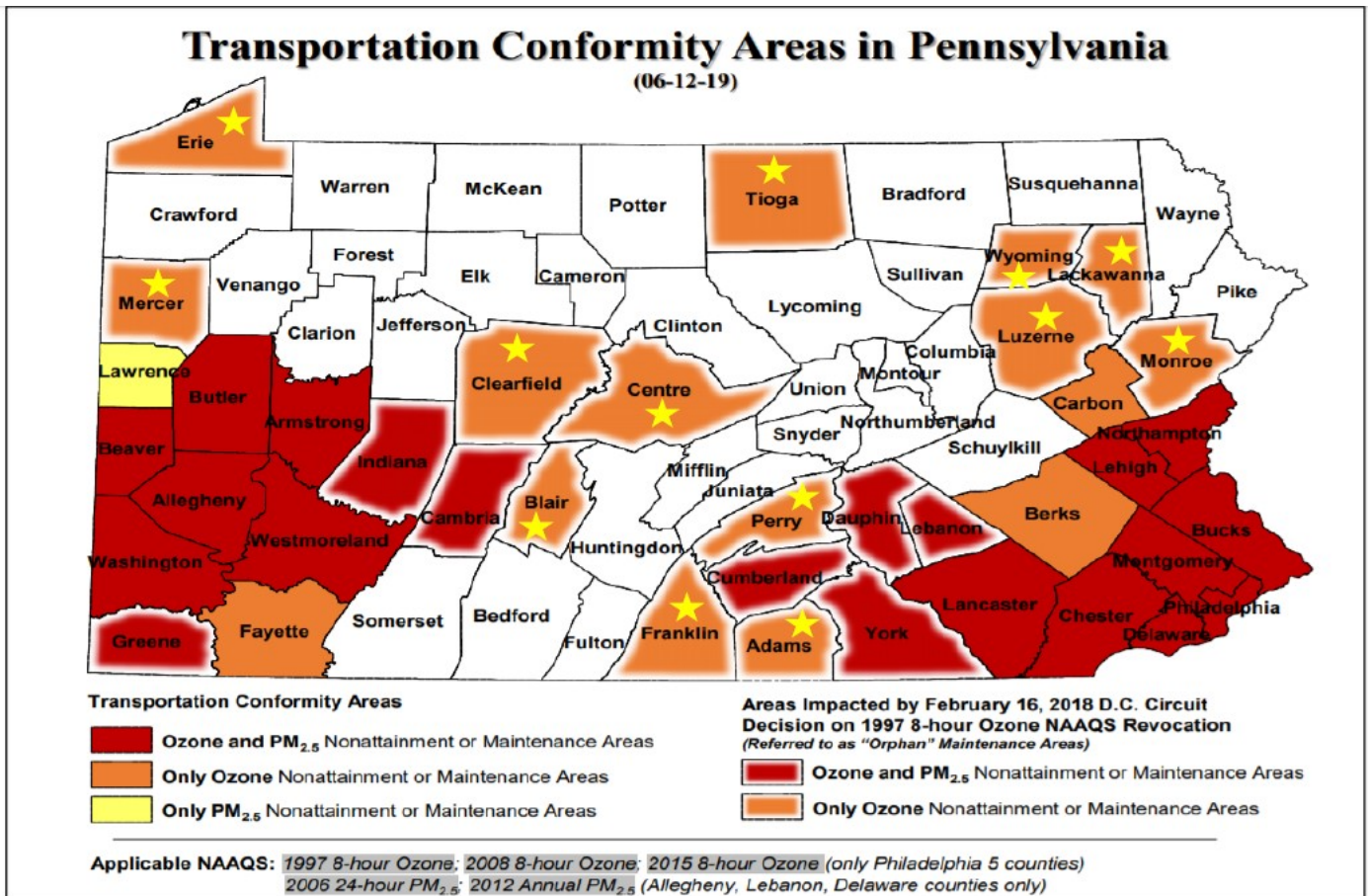
Significant

Region Exempt Code

- X8 - Acquisition of scenic easements
- X1 - Actvty not leading to constr. (plan & tech study)
- S16 - Adding medians
- X7 - Advanced land acquisition (23 CFR 712 or 771)
- A2 - Bicycle and pedestrian facilities
- R6 - Bus terminals and transfer points

ATTACHMENT A: MAP OF AREAS REQUIRING CONFORMITY

Exhibit A1: Areas Requiring Transportation Conformity in Pennsylvania



★ No Emissions Analysis Required

Latest nonattainment and maintenance areas by pollutant can be obtained from EPA Greenbook:

<https://www.epa.gov/green-book>

ATTACHMENT B: RECORD OF CHANGES TO DOCUMENT

Exhibit B1: History of Changes Made To Document

Date	Updates
March 2008	Original Release
April 2009 (4-6-2009)	<ul style="list-style-type: none"> • Title Page updated to reflect latest version data • Added additional bullet point under Step 1 on Page 2 to initiate contact the transit agency to obtain information on transit projects since they are currently not in the MPMS system • Updated the Exhibit 7 MPMS screen to represent most recent version • Revised page 12 text to list available options for the “Conformity Status Code” entry in the MPMS screen
January 2012 (1-10-2012)	<ul style="list-style-type: none"> • Title Page updated to reflect latest version data • Updated the maps on the cover and Exhibits 1, A1, A2, and A3 • Updated the footnote on page 1 to reflect the most recent SIP information • Deleted references to Independent County (IC), as all counties must be part of an MPO or RPO • Added a “Key Issues” bullet point under Step 2 on Page 2 to highlight the importance of detailed project names and descriptions in the air quality coding process • Clarified Step 5 on Page 2 by recognizing that the PennDOT AQ/ Federal Initiatives Section is responsible for finalizing coding for Scenario 1 Agencies and that Scenario 2 Agencies finalize their own coding • Updated Exhibits 3, 4, and 6 to reflect the most recent updates to 40 CFR 93.126 and 127 • Included a definition of Intersection Channelization in Exhibit 6
March 2014 (3-06-14)	<ul style="list-style-type: none"> • Title Page updated to reflect latest version data and revised background map • Page 1 reference to Publication 321 updated (no separate PM screening document) • Page 17 ozone map updated to latest
June 2021	<ul style="list-style-type: none"> • Updates to CPDM contact • Updated Page 2 Steps to include reference to AQ SharePoint site and need for LRTP projects • Added reference to LRTP projects on Page 11 • Added “Exempt Project Clarification “ Section on Page 11 • Added “Special Considerations” section on Page 12 to address roundabouts • Clarified MPMS project categories on Page 13 • Revised format of Process Flowchart on Page 14 • Removed NRS as an exempt category in Figure 6 on Page 16 • Combined exempt study categories (SDX and SDN) in Figure 6 to “SDY” • Updated MPMS screenshot on Page 17 • Replaced nonattainment-maintenance maps with one map on Page 18



Jackie Koons-Felion
Transportation Planning Manager
Pennsylvania Department of Transportation
Center for Program Development & Management
400 North Street, 6th Floor
Harrisburg, Pennsylvania 17120-0064

Phone: 717-787-6388
Email: jfelion@pa.gov
Website: www.dot.state.pa.us/