



U.S. Department
of Transportation

Federal Transit Administration
Region III
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215-656-7260 (fax)

Federal Highway Administration
PA Division
228 Walnut Street, Room 538
Harrisburg, PA 17101-1720
717-221-3461
717-221-3494 (fax)

MAY 15 2007

HPL-PA

Pennsylvania
Harrisburg MPO 2030 Regional
Transportation Plan - 2007
Update & Air Quality
Conformity Determination

Mr. Allen D. Biehler, P.E.
Secretary of Transportation
Commonwealth of Pennsylvania
Harrisburg, Pennsylvania 17105

Dear Mr. Biehler:

We have completed our review of the Harrisburg Area Transportation Study (HATS) MPO 2030 Regional Transportation Plan - 2007 Update (Plan) and 2007-2010 Transportation Improvement Program (TIP) submitted with your letter dated January 4, 2007, and adopted by HATS on December 15, 2006. Based on our review of the information provided and our offices' participation in those transportation planning processes we hereby take the following actions:

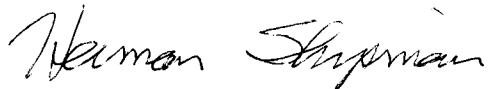
FTA and FHWA, in concurrence with the Environmental Protection Agency (EPA), have determined that the HATS 2030 Regional Transportation Plan - 2007 Update and 2007-2010 TIP conform to the State Implementation Plan (SIP), and are in accordance with the requirements specified in the Transportation Conformity Rule [40 CFR Part 93].

FTA and FHWA find that the update to the HATS Plan and TIP were developed based on a continuing, cooperative, and comprehensive transportation planning process in accordance

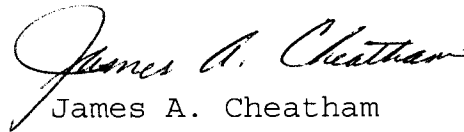
with 23 USC 134 and Section 5303 of the Federal Transit Act
[49 USC app 1607].

If you have any questions regarding this determination, please
do not hesitate to contact either Keith Lynch or Matt Smoker of
our respective offices.

Sincerely yours,



Herman C. Shipman
Acting Regional Administrator
FTA Region III



James A. Cheatham
Division Administrator
FHWA Pennsylvania Division

Enclosures

ec: James Szymborski, HATS
Jim Ritzman, PennDOT
Larry Shifflet, PennDOT
Martin Kotsch, US EPA Region III
Keith Lynch, FTA Region III
Matt Smoker, FHWA PA Division Office



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF TRANSPORTATION
HARRISBURG, PENNSYLVANIA 17101-1900

OFFICE OF
SECRETARY OF TRANSPORTATION

January 4, 2007

Mr. James A. Cheatham, Division Administrator
United States Department of Transportation
Federal Highway Administration
228 Walnut Street, Room 508
Harrisburg, Pennsylvania 17101-1720

Ms. Susan Borinsky, Regional Administrator
Federal Transit Administration
Region III
1760 Market Street, Suite 500
Philadelphia, Pennsylvania 19103-4124

Dear Mr. Cheatham and Ms. Borinsky:

On behalf of the Harrisburg Area Transportation Study (HATS) Metropolitan Planning Organizations (MPO), I am transmitting the 2030 Regional Transportation Plan as approved by the MPO at its December 15, 2006, Coordinating Committee meeting.

Included in the Harrisburg MPO's Long Range Plan package are copies of the following:

- Transmittal letter from Ms. Diane Myers-Krug
- Air Quality Resolution adopted by the HATS Coordinating Committee on December 15, 2006
- HATS 2030 Regional Transportation Plan
- Final Air Quality Conformity Reports document for the 2030 Regional Transportation Plan and the FFY 2007-2010 Transportation Improvement Program (TIP)

Mr. Cheatham and Ms. Borinsky
January 4, 2007
Page 2

We believe that the components of the HATS Regional Transportation Plan meet the requirements of the Clean Air Act Amendments of 1990 and federal requirements regarding the development of long range transportation plans. The Public Involvement and Long Range Plan documents have been transmitted for your information, and we request your review and approval of the Air Quality Conformity component of the plan.

If you have any questions regarding this transmittal, please feel free to contact Mr. James D. Ritzman, of my staff, at (717) 787-2862. The Department stands ready to assist you with any additional information that you may require.

Sincerely,

A handwritten signature in black ink that reads "Allen D. Biehler". The signature is written in a cursive style with a large initial "A" and "B".

Allen D. Biehler, P.E.
Secretary of Transportation

Enclosures



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103

MAY 2 2007

Mr. James A. Cheatham
Division Administrator
Federal Highway Administration
Pennsylvania Division
228 Walnut Street, Room 508
Harrisburg, PA 17101-1720

Dear Mr. Cheatham:

The United States Environmental Protection Agency (EPA) has reviewed the 2007-2010 Transportation Improvement Program and 2030 Regional Transportation Plan 2007 Update 8-hour ozone and PM_{2.5} conformity determinations for Harrisburg, Pennsylvania submitted to us by your office under a cover letter dated February 9, 2007. EPA reviewed the conformity determinations in accordance with the procedures and criteria of the Transportation Conformity Rule contained in 40 CFR Part 93.

The DC Circuit recently vacated certain aspects of EPA's phase 1 rule implementing the 8-hour ozone NAAQS. South Coast Air Quality Management District v. EPA, 472 F.3d 882 (D.C. Cir. 2006). EPA and other parties are seeking rehearing from the court on several aspects of the decision, including conformity. The final position adopted by the DC Circuit could have implications for any action taken with respect to conformity programs in areas that were 1-hour nonattainment or maintenance at the time of revocation of the 1-hour standard.

Enclosed, please find EPA's detailed evaluations titled, "Technical Support Document for Review of the Conformity Determinations for the "Technical Support Document for Review of the 8-Hour Ozone and PM_{2.5} Conformity Determinations for the Harrisburg Area FY 2007-2010 Transportation Improvement Program and 2030 Regional Transportation Plan 2007 Update".

If you have any questions, please contact Carol Febbo, Chief, Energy, Radiation, and Indoor Environment Branch at 215-814-2076 or Martin Kotsch at 215-814-3335.

Sincerely,



Judith M. Katz, Director
Air Protection Division

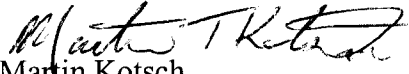
Enclosures

cc: Arleen Shulman (PADEP) w\enclosures
Michael Baker (PennDOT) w\enclosures
Keith Lynch (FTA) w\enclosures
Jim Szymborski (TCRPC) w\enclosures
Matt Smoker (FHWA) w\enclosures

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103

April 26, 2007

SUBJECT: Technical Support Document for Review of the 8-Hour Ozone and PM2.5
Conformity Determinations for the Harrisburg Area FY 2007-2010 Transportation
Improvement Program and 2030 Regional Transportation Plan 2007 Update

FROM: 
Martin Kotsch
Energy, Radiation and Indoor Environment Branch (3AP23)

TO: Administrative Record of EPA's Review of the 8-Hour Ozone and PM2.5
Conformity Determinations for the Harrisburg Area FY 2007-2010 Transportation
Improvement Program and 2030 Regional Transportation Plan 2007 Update

THRU: Carol Febbo, Chief 
Energy, Radiation and Indoor Environment Branch (3AP23)

The purpose of this document is to review the 8-Hour Ozone and PM2.5 transportation conformity determinations for Harrisburg, Pennsylvania area prepared by the regional Metropolitan Planning Organization (MPO) and the Pennsylvania Department of Transportation (PennDOT) to determine whether or not the conformity determinations meet the requirements of the Clean Air Act and the applicable regulations promulgated thereunder at 40 C.F.R. Part 93. The area is comprised of Cumberland, Dauphin and Perry Counties, with all three counties within the 8-hour ozone non-attainment area and Cumberland and Dauphin Counties within the PM2.5 non-attainment area. The MPO for the area is the Harrisburg Area Transportation Study (HATS). On February 13, 2007, EPA Region III received the Harrisburg area FY 2007-2010 Transportation Improvement Program (TIP) and 2030 Regional Transportation Plan (Plan) 2007 Update conformity determinations under a cover letter dated February 9, 2007 from the Pennsylvania Division Office of the Federal Highway Administration (FHWA). The conformity determinations were reviewed in accordance with the procedures and criteria of the Transportation Conformity Rule contained in 40 CFR Part 93, Sections 93.102(b)(1), 93.102(b)(2)(iv), 93.102(b)(2)(v), 93.102(b)(3), 93.106, 93.108, 93.110, 93.111, 93.112, 93.113(b), 93.113(c), and 93.119.

For the 8-hour ozone standard, the Harrisburg area is classified as a basic nonattainment area with an attainment date of 2009. For the 8-hour conformity analysis, the area has the choice of doing either the no greater than base year test or build/no greater than no-build test for the area. For the 8-hour conformity analysis, a no greater than 2002 base year test was used.

For the PM2.5 standard, the Harrisburg area is classified as nonattainment for the PM2.5 annual standard with a statutory ozone attainment date of 2010. There are no PM2.5 SIP budgets for the area, therefore an interim test of using the less than base year (2002) test analysis was conducted. Under 93.109 (e), this interim test is permissible as the area had choice of either the less than base year test or build/no greater than build analysis for the area .

The HATS portion of the planning area is a part of the larger Harrisburg-Lebanon-Carlisle non-attainment area for the PM2.5 annual standard. HATS utilized its own transportation model for its own portion of the planning area of the larger non-attainment area. Its conformity determination results were combined with the remaining non-attainment area's previous conformity determination results which had been reaffirmed by that area as still being valid since there were no changes in their TIP or Plan. Combining these two conformity determinations will allow FHWA to make a conformity determination for the entire non-attainment area.

**EPA'S EVALUATION OF THE CONFORMITY DETERMINATION OF THE PLAN AND TIP SUBMITTED BY
THE PENNSYLVANIA DIVISION OFFICE OF THE FEDERAL HIGHWAY ADMINISTRATION TO EPA ON
FEBRUARY 9, 2007**

GENERAL CRITERIA APPLICABLE TO BOTH PLAN AND TIP

SECTION OF 40 CFR PART 93	CRITERIA	Y/N	COMMENTS
93.110	<p>Is the conformity determination based upon the latest planning assumptions?</p> <p>(a) Is the conformity determination, with respect to all other applicable criteria in §§93.111 - 93.119, based upon the most recent planning assumptions in force at the time of the conformity determination?</p> <p>(b) Are the assumptions derived from the estimates of current and future population, employment, travel, and congestion most recently developed by the MPO or other designated agency and is the conformity based upon the latest assumptions about current and future background concentrations?</p> <p>(c) Are any changes in the transit operating policies (including fares and service levels) and assumed transit ridership discussed in the determination?</p> <p>(d) Does the conformity determination include reasonable assumptions about transit service and increases in transit fares and road and bridge tolls over time?</p>	<p>Y</p> <p>Y</p> <p>Y</p> <p>Y</p>	<p>Planning assumptions, including vehicle registration and other traffic inputs, are based upon the most recent data, which are from 2002.</p> <p>The assumptions were developed by the MPO in consultation with the Pennsylvania Department of Transportation (PennDOT) and are based upon the most recently developed data and including 2002 HPMS data, 2002 vehicle fleet age distribution, 2002 vehicle mix patterns and population and labor projections based on 2000 census data.</p> <p>Transit operating changes and assumed ridership are reflected using model and off-model techniques.</p> <p>Reasonable assumptions were made. There are no specific plans for service or fare/toll changes.</p>

	<p>(e) Does the conformity determination use the latest existing information regarding the effectiveness of Transportation Control Measures (TCMs) and other implementation plan measures which have already been implemented?</p> <p>(f) Are key assumptions specified and included in the draft documents and supporting materials used for the interagency and public consultation required by §93.105?</p>	<p>Y</p> <p>Y</p>	<p>There are no TCMs in the SIP, but other implementation plan control measures (enhanced I&M) were accounted for.</p> <p>Documents containing key assumptions and supporting materials were available during the interagency and public consultation periods.</p>
93.111	Is the conformity determination based upon the latest emissions model?	Y	The conformity determinations were based upon emission factors developed using MOBILE6.2, the most recent EPA-approved mobile emissions model.
93.112	Did the MPO make the conformity determination according to the consultation procedures of the conformity rule or the state's conformity SIP?	Y	The conformity determinations were made according to the consultation procedures of the Federal conformity rule. Through the public consultation process, there was a public comment period of 30 days from November 1 to November 30, 2006 and a public meeting (November 15, 2006). There were several public comments submitted by the Clean Air Board of Central Pennsylvania relevant to air quality. The MPO answered each of the comments responsively.

**EPA's EVALUATION OF THE CONFORMITY DETERMINATION OF THE PLAN SUBMITTED BY THE
PENNSYLVANIA DIVISION OFFICE OF THE FEDERAL HIGHWAY ADMINISTRATION.
TO EPA ON FEBRUARY 9, 2007**

CRITERIA APPLICABLE TO THE PLAN

93.102(b)(2)(I v)	Has the EPA and the State made a finding that NOx is an insignificant contributor to the direct mobile PM emissions or does any applicable implementation plan (or implementation plan submission) fail to establish an approved (or adequate) NOx budget as part of a PM 2.5 reasonable further progress, attainment or maintenance strategy?	N	NOx is included in the PM emission analysis
93.102(b)(2)(v)	Has the EPA or State made a finding that VOCs, SOx or NH(3) as precursors to be a significant contributor to the mobile PM emissions or has an applicable implementation plan (or implementation plan submission) establish an approved (or adequate) budget for VOCs, SOx or NH(3) as part of a PM 2.5 reasonable further progress, attainment or maintenance strategy?	N	VOCs, SOx and NH(3) as precursors are not included in the emissions analysis
93.102(b)(3)	Has the EPA or the State made a finding that re-entrained road dust is a significant contributor to the PM mobile emissions or has an applicable implementation plan (or implementation plan submission) establish an approved (or adequate) budget that includes re-entrained road dust as part of a PM 2.5 reasonable further progress, attainment or maintenance strategy?	N	Re-entrained road dust is not included in the emissions analysis.
93.106(a)(1)	Are the horizon years correct?	Y	The years chosen (2009, 2010, 2020, and 2030) are appropriate horizon years for the 8-hour conformity analysis. The years chosen for the PM2.5 analyses (2009, 2010, 2020 and 2030) are appropriate horizon years. 2009 falls within the first five years of the plan
93.106(a)(2)(i)	Does the plan quantify and document the demographic and employment factors influencing transportation demand?	Y	A land use input file (including demographic and employment information) is included as Appendix F in Part II, Technical Analysis

93.106(a)(2) (ii)	Is the highway and transit system adequately described in terms of the regionally significant additions or modifications to the existing transportation network which the transportation plan envisions to be operational in the horizon years?	Y	They are described in the conformity report in Volume II which lists all relevant projects .
93.108	Is the transportation plan fiscally constrained?	Y	The MPO along with PennDOT have found the Plan to be fiscally constrained.
93.113(b)	Are TCM's being implemented in a timely manner.	N/A	There are no TCMs in the SIP.

93.119	For areas without emission budgets: Does the Transportation Plan, TIP or Project demonstrate contribution to emission reductions?	Y	<p>For the Harrisburg area, the projected emissions for 2009, 2010, 2020 and 2030 were demonstrated to be no greater than the 2002 base year to satisfy the 8-hour ozone conformity requirement. All emissions are average summer weekday, kilograms per day</p> <table border="1" data-bbox="950 420 1404 798"> <thead> <tr> <th><u>Year</u></th> <th><u>VOC</u></th> <th><u>NOx</u></th> </tr> </thead> <tbody> <tr> <td>2002 (base year)</td> <td>32,788</td> <td>64,867</td> </tr> <tr> <td>2009</td> <td>19,684</td> <td>38,050</td> </tr> <tr> <td>2010</td> <td>18,299</td> <td>34,715</td> </tr> <tr> <td>2020</td> <td>8,951</td> <td>11,858</td> </tr> <tr> <td>2030</td> <td>8,222</td> <td>7,146</td> </tr> </tbody> </table> <p>There are no PM2.5 SIP budgets for the area, therefore an interim test of using the less than base year (2002) test analysis was conducted and the results are showed below. Under 93.109(e), this interim test is permissible as the area had choice of either the less than base year test or build/no greater than build analysis for the area . The base year emissions are based on emissions modeling done by the MPO and agreed upon by PADEP and are shown in tons per year. The analysis shows that the PM2.5 non-attainment area passes the interim emissions test.</p> <table border="1" data-bbox="966 1260 1477 1732"> <tbody> <tr> <td><u>2002 BaseYear</u></td> <td><u>2009 Analysis</u></td> </tr> <tr> <td>330.6 tpy (Direct PM)</td> <td>206.2 tpy (Direct PM)</td> </tr> <tr> <td>22067.4 tpy (NOx)</td> <td>12810.4 tpy (NOx)</td> </tr> <tr> <td><u>2002 BaseYear</u></td> <td><u>2010 Analysis</u></td> </tr> <tr> <td>330.6 tpy (Direct PM)</td> <td>190.6 tpy (Direct PM)</td> </tr> <tr> <td>22067.4 tpy (NOx)</td> <td>11658.9 tpy (NOx)</td> </tr> <tr> <td><u>2002 Base Year</u></td> <td><u>2020 Analysis</u></td> </tr> <tr> <td>330.6 tpy (Direct PM)</td> <td>124.3 tpy (Direct PM)</td> </tr> <tr> <td>22067.4 tpy (NOx)</td> <td>3817.1tpy (NOx)</td> </tr> <tr> <td><u>2002 Base Year</u></td> <td><u>2030 Analysis</u></td> </tr> <tr> <td>330.6 tpy (Direct PM)</td> <td>127.6 tpy (Direct PM)</td> </tr> <tr> <td>22067.4 tpy (NOx)</td> <td>2197.5 tpy (NOx)</td> </tr> </tbody> </table>	<u>Year</u>	<u>VOC</u>	<u>NOx</u>	2002 (base year)	32,788	64,867	2009	19,684	38,050	2010	18,299	34,715	2020	8,951	11,858	2030	8,222	7,146	<u>2002 BaseYear</u>	<u>2009 Analysis</u>	330.6 tpy (Direct PM)	206.2 tpy (Direct PM)	22067.4 tpy (NOx)	12810.4 tpy (NOx)	<u>2002 BaseYear</u>	<u>2010 Analysis</u>	330.6 tpy (Direct PM)	190.6 tpy (Direct PM)	22067.4 tpy (NOx)	11658.9 tpy (NOx)	<u>2002 Base Year</u>	<u>2020 Analysis</u>	330.6 tpy (Direct PM)	124.3 tpy (Direct PM)	22067.4 tpy (NOx)	3817.1tpy (NOx)	<u>2002 Base Year</u>	<u>2030 Analysis</u>	330.6 tpy (Direct PM)	127.6 tpy (Direct PM)	22067.4 tpy (NOx)	2197.5 tpy (NOx)
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**EPA'S EVALUATION OF THE CONFORMITY DETERMINATION OF THE TIP SUBMITTED BY THE
PENNSYLVANIA DIVISION OFFICE OF THE FEDERAL HIGHWAY ADMINISTRATION
TO EPA ON FEBRUARY 9, 2007**

CRITERIA APPLICABLE TO THE TIP

93.102(b)(2)(I v)	Has the EPA and the State made a finding that NOx is an insignificant contributor to the direct mobile PM emissions or does any applicable implementation plan (or implementation plan submission) fail to establish an approved (or adequate) NOx budget as part of a PM 2.5 reasonable further progress, attainment or maintenance strategy?	N	NOx is included in the PM emission analysis
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93.108	Is the TIP fiscally constrained?	Y	The MPO along with PennDOT have found the Plan to be fiscally constrained.
93.113(c)	Are TCM's being implemented in a timely manner.	N/A	There are no TCMs in the SIP.

93.119	For areas without emission budgets: Does the Transportation Plan, TIP or Project demonstrate contribution to emission reductions?	Y	<p>For the Harrisburg area, the projected emissions for 2009, 2010, 2020 and 2030 were demonstrated to be no greater than the 2002 base year to satisfy the 8-hour ozone conformity requirement. All emissions are average summer weekday, kilograms per day</p> <table border="1" data-bbox="948 422 1403 793"> <thead> <tr> <th><u>Year</u></th> <th><u>VOC</u></th> <th><u>NOx</u></th> </tr> </thead> <tbody> <tr> <td>2002 (base year)</td> <td>32,788</td> <td>64,867</td> </tr> <tr> <td>2009</td> <td>19,684</td> <td>38,050</td> </tr> <tr> <td>2010</td> <td>18,299</td> <td>34,715</td> </tr> <tr> <td>2020</td> <td>8,951</td> <td>11,858</td> </tr> <tr> <td>2030</td> <td>8,222</td> <td>7,146</td> </tr> </tbody> </table> <p>There are no PM2.5 SIP budgets for the area, therefore an interim test of using the less than base year (2002) test analysis was conducted and the results are showed below. Under 93.109(e), this interim test is permissible as the area had choice of either the less than base year test or build/no greater than build analysis for the area . The base year emissions are based on emissions modeling done by the MPO and agreed upon by PADEP and are shown in tons per year. The analysis shows that the PM2.5 non-attainment area passes the interim emissions test.</p> <table border="1" data-bbox="948 1262 1451 1730"> <tbody> <tr> <td><u>2002 BaseYear</u> 330.6 tpy (Direct PM) 22067.4 tpy (NOx)</td> <td><u>2009 Analysis</u> 206.2 tpy (Direct PM) 12810.4 tpy (NOx)</td> </tr> <tr> <td><u>2002 BaseYear</u> 330.6 tpy (Direct PM) 22067.4 tpy (NOx)</td> <td><u>2010 Analysis</u> 190.6 tpy (Direct PM) 11658.9 tpy (NOx)</td> </tr> <tr> <td><u>2002 Base Year</u> 330.6 tpy (Direct PM) 22067.4 tpy (NOx)</td> <td><u>2020 Analysis</u> 124.3 tpy (Direct PM) 3817.1tpy (NOx)</td> </tr> <tr> <td><u>2002 Base Year</u> 330.6 tpy (Direct PM) 22067.4 tpy (NOx)</td> <td><u>2030 Analysis</u> 127.6 tpy (Direct PM) 2197.5 tpy (NOx)</td> </tr> </tbody> </table>	<u>Year</u>	<u>VOC</u>	<u>NOx</u>	2002 (base year)	32,788	64,867	2009	19,684	38,050	2010	18,299	34,715	2020	8,951	11,858	2030	8,222	7,146	<u>2002 BaseYear</u> 330.6 tpy (Direct PM) 22067.4 tpy (NOx)	<u>2009 Analysis</u> 206.2 tpy (Direct PM) 12810.4 tpy (NOx)	<u>2002 BaseYear</u> 330.6 tpy (Direct PM) 22067.4 tpy (NOx)	<u>2010 Analysis</u> 190.6 tpy (Direct PM) 11658.9 tpy (NOx)	<u>2002 Base Year</u> 330.6 tpy (Direct PM) 22067.4 tpy (NOx)	<u>2020 Analysis</u> 124.3 tpy (Direct PM) 3817.1tpy (NOx)	<u>2002 Base Year</u> 330.6 tpy (Direct PM) 22067.4 tpy (NOx)	<u>2030 Analysis</u> 127.6 tpy (Direct PM) 2197.5 tpy (NOx)
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