

**State College Area Connector  
Draft Planning and Environmental  
Linkages (PEL) Study  
Public Comment Summary Report**



June 2023

## Table of Contents

Availability of the Draft PEL Study .....	1
Notifications .....	1
Press Releases .....	1
Email Notifications.....	1
PennDOT Social Media Notifications .....	1
Media Notifications .....	2
Public Comment Overview.....	2
Conclusion .....	2

## List of Appendices

APPENDIX A – Press Releases

APPENDIX B – Email Notifications

APPENDIX C – PennDOT Social Media Notifications

APPENDIX D – Media Notifications

APPENDIX E – Draft PEL Study Report Public Comments and Responses

## Availability of the Draft PEL Study

The Pennsylvania Department of Transportation (PennDOT), in cooperation with the Federal Highway Administration (FHWA) and in coordination with the Centre County Metropolitan Planning Organization (CCMPO), prepared the Draft Planning and Environmental Linkages (PEL) Study report for the State College Area Connector (SCAC) Study. The Draft PEL Study report and supporting technical documents were made available for 30-day public review and comment via the PennDOT study website ([www.PennDOT.gov/SCAC](http://www.PennDOT.gov/SCAC)) on February 16, 2023. Information regarding the opportunity to submit written comments during the comment period was provided on the study website. Additionally, PennDOT provided contact information for accommodation requests to ensure that people with disabilities and those with limited English proficiency had an equal opportunity to participate in the Draft PEL Study comment period. No such requests were made. All comments were to be received or postmarked by March 19, 2023. This report documents the Draft PEL Study notification process, comments received during the public comment period, and associated comment responses.

## Notifications

A variety of methods were used to notify citizens and interested parties (e.g., property and business owners, etc.) of the Draft PEL Study report availability and public comment period. These notifications included:

### Press Releases

As part of the public involvement process, an official Press Release was issued by PennDOT's District 2 Press Office on February 16, 2023, to announce the availability of the Draft PEL Study, supporting technical documents, and public comment period. A reminder of the Draft PEL Study availability and comment period was issued by PennDOT's District 2 Press Office on March 9, 2023. Press Releases were distributed to major media outlets in the Centre County region. Copies of the press releases are included in **Appendix A**.

### Email Notifications

An email notification was sent to study website subscribers on February 16, 2023 to announce the availability of the Draft PEL Study and supporting technical documents for review and comment. The email notification included the study website address, contact information to submit written comments, and public comment deadline. A reminder email notification was sent on March 9, 2023 to study website subscribers. Copies of the email notification graphics are included in **Appendix B**.

### PennDOT Social Media Notifications

Notifications of the availability of the Draft PEL Study and supporting technical documents for public review and comment were posted on the PennDOT District 2-0's Twitter account and PennDOT's Facebook page. PennDOT tweeted the PEL Study availability

announcement via their 511PAStateCollege account on February 16, 2023. The Facebook post on PennDOT's page occurred on March 6, 2023. A reminder notification was tweeted via their 511PAStateCollege account on March 9, 2023. Copies of the social media notifications are included in **Appendix C**.

## Media Notifications

Various media outlets published articles and reports about the availability of the Draft PEL Study and public comment period. Example articles by the Centre Daily Times and StateCollege.com published on February 16, 2023, and a report by WJAC6 published on February 22, 2023, are included in **Appendix D**.

## Public Comment Overview

The public comment period was open from February 16, 2023 to March 19, 2023. Comments were accepted by mail and email. A total of 46 comments were received – 4 by mail and 42 by email. These comments and associated responses can be found in **Appendix E**. Public comments which required changes to the PEL Study report will be implemented in the Final PEL Study document and made available on the study website.

## Conclusion

The information presented in this report summarizes the availability of the SCAC PEL Study report and supporting technical documentation and the notification efforts undertaken to engage the public. The public comment period was open from February 16, 2023 to March 19, 2023. A total of 46 public comments were received during the comment period. Information received from this public comment period will be used to guide the study team in finalizing the PEL Study report and aid in informing future decisions during preliminary engineering and environmental studies.

## APPENDIX A – Press Releases



**FOR IMMEDIATE RELEASE**  
**February 16, 2023**

**CONTACT:** Marla Fannin [mfannin@pa.gov](mailto:mfannin@pa.gov)

## **PennDOT Releases Draft PEL as Part of the State College Area Connector (SCAC) Study**

**State College, PA** – The Pennsylvania Department of Transportation (PennDOT) announced today that the draft PEL (Planning and Environmental Linkages (PEL) Study) for the State College Area Connector Study (SCAC) is now available on the project site at [www.penndot.pa.gov/SCAC](http://www.penndot.pa.gov/SCAC).

The SCAC study is being conducted by PennDOT in cooperation with the Federal Highway Administration (FHWA). The results of the PEL Study identify transportation alternatives to advance into the National Environmental Policy Act (NEPA) process and preliminary engineering.

The Draft PEL report is being made available for public review and comment for a 30-day period. All comments must be received by the end of the day, March 19, 2023. All comments should be submitted electronically to:  
Dean Ball, PE at [Deball@pa.gov](mailto:Deball@pa.gov)

Comments can also be submitted in writing to:  
PennDOT District 2-0, 70 PennDOT Drive, Clearfield, PA 16830, Attn: Dean Ball, PE.

SCAC Study information, including the draft PEL and other documents is available at [www.penndot.pa.gov/SCAC](http://www.penndot.pa.gov/SCAC). The website is part of public outreach efforts undertaken by PennDOT and FHWA during all phases of the study.

Follow PennDOT on [Twitter](#) and like the department on [Facebook](#) and [Instagram](#).

###



**FOR IMMEDIATE RELEASE**

**March 9, 2023**

**CONTACT:** Marla Fannin [mfannin@pa.gov](mailto:mfannin@pa.gov) or 814.765.0423

## **Public Reminded of Comment Period on Draft PEL for (SCAC) Study**

**State College, PA** – The Pennsylvania Department of Transportation (PennDOT) is reminding the public that the comment period for the draft PEL (Planning and Environmental Linkages (PEL) Study) of the State College Area Connector Study (SCAC) is open through March 19. The draft PEL is available on the project site at [www.penndot.pa.gov/SCAC](http://www.penndot.pa.gov/SCAC).

The Draft PEL report was made available for public review and comment for a 30-day period, starting February 16 and running through March 19. All comments should be submitted electronically to: Dean Ball, PE at [Deball@pa.gov](mailto:Deball@pa.gov)

Comments can also be submitted in writing to:

PennDOT District 2-0, 70 PennDOT Drive, Clearfield, PA 16830, Attn: Dean Ball, PE.

All comments must be received by the end of the day, March 19, 2023.

SCAC Study information, including the draft PEL and other documents are available at [www.penndot.pa.gov/SCAC](http://www.penndot.pa.gov/SCAC). The website is part of public outreach efforts undertaken by PennDOT and FHWA during all phases of the study.

Follow PennDOT on [Twitter](https://twitter.com/PennDOT) and like the department on [Facebook](https://www.facebook.com/PennDOT) and [Instagram](https://www.instagram.com/PennDOT).

###

## APPENDIX B – Email Notifications



## The Draft State College Area Connector Planning and Environmental Linkages (PEL) Report and supporting technical documents are being made available for public review and comment for a 30-day period.

All comments must be received by **March 19, 2023**.



Visit [www.penndot.pa.gov/scac](http://www.penndot.pa.gov/scac) to view these documents.

All comments should be submitted electronically to:

Dean Ball, PE at [Deball@pa.gov](mailto:Deball@pa.gov)

or in writing to

PennDOT District 2-0  
Attn: Dean Ball, PE.  
70 PennDOT Drive  
Clearfield, PA 16830

state college area  
**CONNECTOR**



# Comment Deadline is March 19

**The Draft State College Area Connector  
Planning and Environmental Linkages (PEL) Report**  
and supporting technical documents are available  
for public review and comment for a 30-day period.  
All comments must be received by **March 19, 2023**.

Visit [www.penndot.pa.gov/scac](http://www.penndot.pa.gov/scac) to view these documents.

All comments should be submitted electronically to:

Dean Ball, PE at [Deball@pa.gov](mailto:Deball@pa.gov)

or in writing to

PennDOT District 2-0  
Attn: Dean Ball, PE.  
70 PennDOT Drive  
Clearfield, PA 16830



## APPENDIX C – PennDOT Social Media Notifications



511PA StateCollege   
 @511PAStateColl



PennDOT Releases Draft PEL as Part of the State College Area Connector (SCAC) Study   
 [penndot.pa.gov/RegionalOffice...](https://penndot.pa.gov/RegionalOffice...)



penndot.pa.gov   
 State College Area Connector

12:12 PM · Feb 16, 2023 · 189 Views



Pennsylvania Department of Transportation (PennDOT) updated the event cover photo in Planning and Environment (PEL) Linkages Study for State College Area Connector .



March 6 at 9:05 AM ·

## Public Comment Period

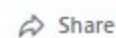
### Draft Planning and Environmental Linkages Study for the State College Area Connector Study

**Comments will be accepted through March 19, 2023**

Submit comments electronically to: Dean Ball, PE at [deball@pa.gov](mailto:deball@pa.gov)

#### Written comments should be addressed to:

PennDOT District 2-0   
 70 PennDOT Drive, Clearfield, PA 16830   
 Attn: Dean Ball, PE





511PA StateCollege   
@511PAStateColl



Public Reminded of Comment Period on Draft PEL for (SCAC) Study  
[penndot.pa.gov/RegionalOffice...](https://penndot.pa.gov/RegionalOffice...)



penndot.pa.gov  
State College Area Connector

11:01 AM · Mar 9, 2023 · 356 Views

2 Quote Tweets 1 Like

## APPENDIX D – Media Notifications



LOG IN SUBSCRIBE

# CENTRE DAILY TIMES

Part of the McClatchy Media Network

Coronavirus Opinion PSU Football Obituaries • Business 2022 Election Personal Finance Jobs/Recruiting

COMMUNITY

## Draft study on State College Area Connector project is done. How to read it, give input

BY BRET PALLOTTO

UPDATED FEBRUARY 16, 2023 3:47 PM



CENTRE DAILY TIMES

For years, PennDOT has discussed the U.S. Route 322 connector project that will complete a four-lane highway from Harrisburg to State College.

Essential. Dependable. Local. Subscribe today for \$1.



Only have a minute? Listen instead

Powered by **Trinity Audio**

00:00



1.0x

01:43

A [draft report](#) that details how Pennsylvania’s transportation agency identified three potential routes for a major highway construction project in Centre County was released Thursday.

The Pennsylvania Department of Transportation’s 123-page draft planning and environmental linkages study summarizes much of the information that has already been publicly released. The study is the first of five phases in the development of all state transportation projects.

The report can be reviewed for 30 days. All comments must be received by PennDOT by March 19. They can be sent to project manager Dean Ball at [deball@pa.gov](mailto:deball@pa.gov) or in writing to PennDOT District 2-0, 70 PennDOT Drive, Clearfield, PA 16830, Attn: Dean Ball, PE.

**TOP VIDEOS**

**AD**

[Learn More](#)

Skip Ad

All three potential alignments — identified by PennDOT as U.S. 322-1S, U.S. 322-1OEX and U.S. 322-5 — would bring the project through the U.S. Route 322 corridor at a cost that ranges from \$432 million to \$517 million. Main line construction would span about eight miles.

The first two options would include a connection with state Route 45. The third option would run the project south of the existing highway. Each would connect



Essential. Dependable. Local. Subscribe today for \$1.

traffic is expected to increase nearly 35%. Without construction, PennDOT wrote in the report, the roads in the area will not be able to handle the additional vehicles.

Construction is scheduled to begin in 2028 and be completed by 2033.

**READ NEXT**

LATEST NEWS

**SCAC Draft PEL Study Report.pdf**

FEBRUARY 16, 2023 1:45 PM

SCAC Draft PEL Study Report

state college area  
**CONNECTOR**

**PLANNING AND ENVIRONMENTAL LINKAGES**  
(PEL) STUDY

pennsylvania  
DEPARTMENT OF TRANSPORTATION

**DRAFT**

Document 1 of 123 100%

Essential. Dependable. Local. Subscribe today for \$1.

COMMUNITY

**PennDOT warns of ‘misleading’ letter over connector project. An attorney pushes back**

FEBRUARY 03, 2023 5:00 AM

LOCAL

**Centre County residents feel misled about State College Area Connector Project. Here’s why**

OCTOBER 05, 2022 2:04 PM



**BRET PALLOTTO**



814-231-4648

Bret Pallotto primarily reports on courts and crime for the Centre Daily Times. He was raised in Mifflin County and graduated from Lock Haven University.

## Take Us With You

Real-time updates and all local stories you want right in the palm of your hand.



CENTRE DAILY TIMES APP →

[VIEW NEWSLETTERS →](#)

## SUBSCRIPTIONS

[Start a Subscription](#)

[Customer Service](#)

[eEdition](#)

[Vacation Hold](#)

[Pay Your Bill](#)

## LEARN MORE

[About Us](#)

[Contact Us](#)

[Newsletters](#)

[Archives](#)

[Personal Finance](#)

## ADVERTISING

[McClatchy Advertising](#)

[Place an Ad](#)

[Place a Classified Ad](#)

## PennDOT Releases Draft Study on State College Area Connector Project; Opens Public Comment Period



PennDOT narrowed potential alignments for the State College Area Connector to three options within the Route 322 corridor. Image via PennDOT

By [Geoff Rushton](#) - February 16, 2023

[Local News](#)

The Pennsylvania Department of Transportation on Thursday released a full draft study that evaluated mobility needs in southern Centre County and narrowed the options for the planned State College College Area Connector project from nine to three.

A Planning and Environmental Linkage study, conducted with the Federal Highway Administration, evaluated existing and projected transportation needs within a 70-square-mile area in the U.S. Route 322, state Route 45 and state route

144 corridor, where the existing road network and configurations cause safety concerns and lack continuity.

A word from our Ad partners

“Traffic forecasts show total traffic volumes increasing in the area nearly 31% and truck volumes increasing nearly 35% between 2017 and 2050,” according to the draft PEL study. “These roadways will be unable to accommodate the additional vehicles thus causing additional congestion, travel delays and negatively affecting safety.”

The [123-page draft study](#) further details key information that has already been released about the project to improve the connection from the Seven Mountains area of Route 322 into the State College area and Interstates 99 and 80. Public review and comment is open for a 30-day period. All comments must be received by March 19 and should be submitted electronically to Dean Ball, PE at [Deball@pa.gov](mailto:Deball@pa.gov) or in writing to PennDOT District 2-0, 70 PennDOT Drive, Clearfield, PA 16830, Attn: Dean Ball, PE.

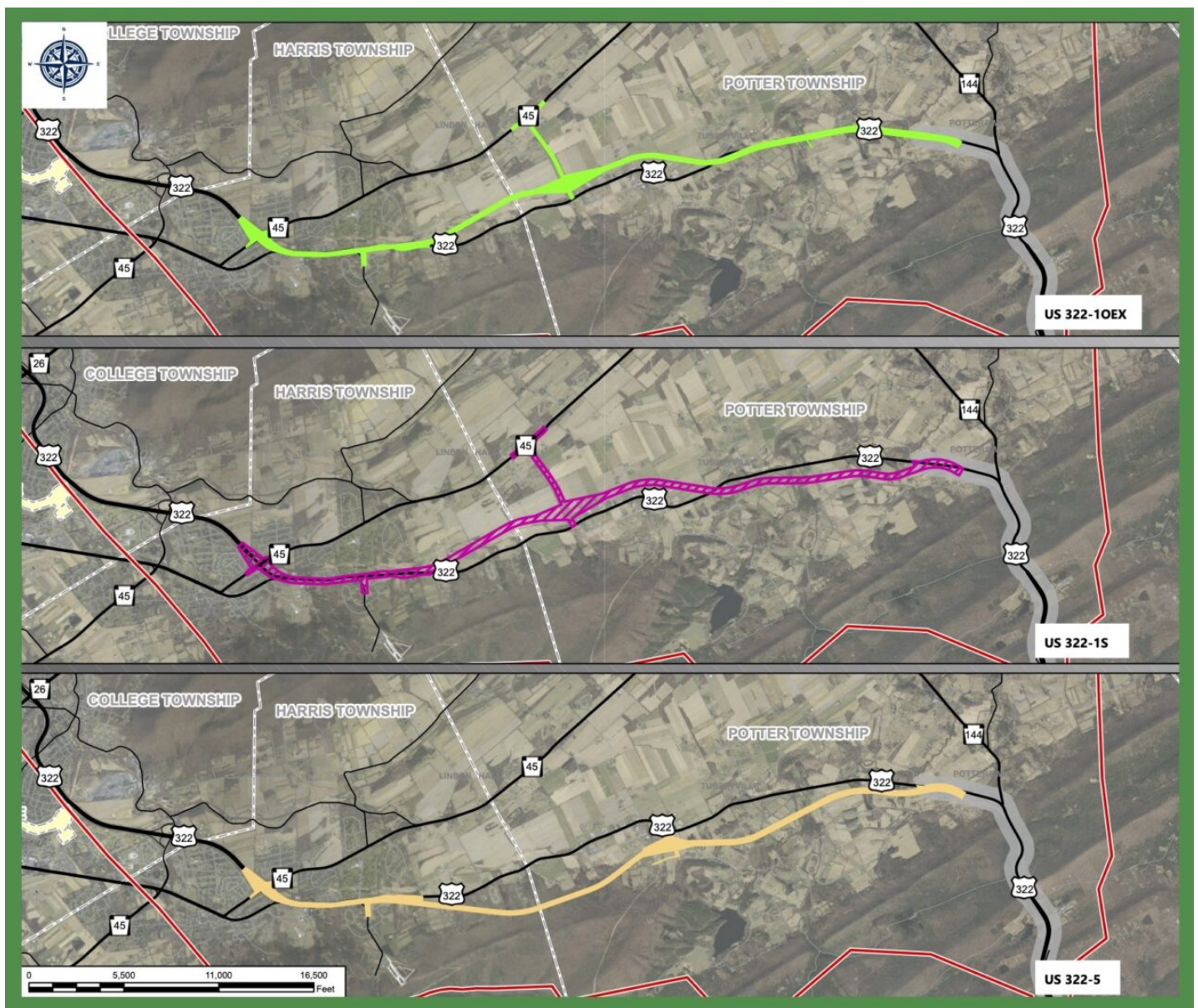
In September, PennDOT [narrowed the options](#) to three potential “build alternative” routes for further study in the current Route 322 corridor in Potter and Harris townships. It eliminated alternatives in the Route 144 corridor routes that would have gone over Centre Hall Mountain, as well as upgrading the existing Route 322 in the study area.

The three options – US 322-10EX, US 322-1S and US 322-5 – each would connect U.S. 322 at the Mt. Nittany Expressway in Boalsburg and US 322 at Potters Mills Gap, where a four-lane section of highway was completed in 2021. The link would essentially complete a four-lane highway from Harrisburg to State College and beyond.

Promoted Links by Taboola

Both US 322-10EX and US 322-1S would have an interchange with a connector road between Route 45 and U.S. 322.

Each build alternative is about 8 miles long and is projected to divert nearly 53% of the total traffic and 73% of truck traffic from the local road network. Estimated costs range from \$432 million and \$517 million.



The potential alignment options for the State College Area Connector project. Image via PennDOT

Harris Township supervisors and property owners in the proposed corridor have **raised concerns** about the potential alignments, stating the homes and longtime family farms may be lost, property values damaged and the rural character of the area forever altered. The potential connector between Route 45 and U.S. 322 has raised worries about safety issues, pollution, damage to residential areas and Route 45 being ill-equipped to handle increased traffic.

A word from our Ad partners

The PEL study is the first of **five phases** of advancing a transportation project. After the study is finalized, it will be followed by preliminary engineering and environmental studies, final engineering design, right-of-way acquisition and construction.

StateCollege.com provides local news, entertainment, and information for State College, PA. We offer the latest breaking news and videos straight from the Centre County region in Central PA.

220 Regent Court, Suite B, State College, PA 16801

Contact us: [info@statecollege.com](mailto:info@statecollege.com)

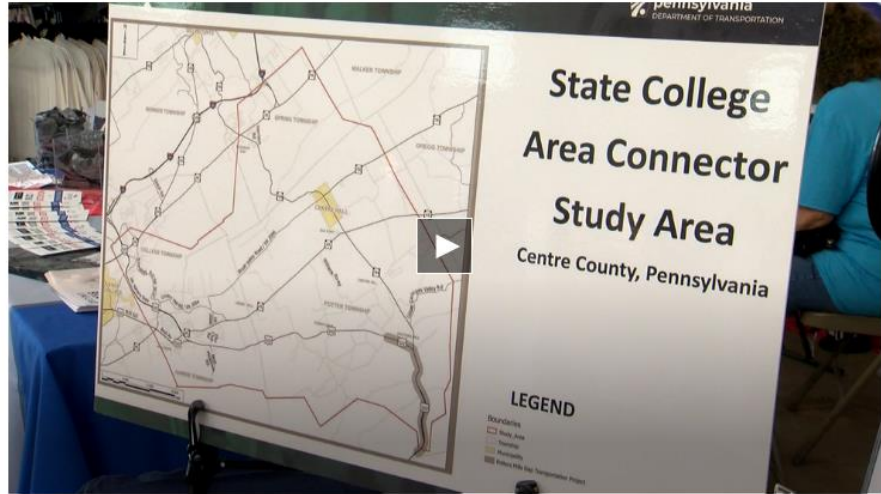


© Copyright 2000 – 2023 | StateCollege.com® | All Rights Reserved | State College, PA – Centre County – Central Pennsylvania – Home of Penn State University

This site is protected by reCAPTCHA and the Google [Privacy Policy](#) and [Terms of Service](#) apply.

## PennDOT issues draft report for State College Connector Project; final route undecided

by Gary Sinderson | Wed, February 22nd 2023, 5:45 PM EST



State College Connector latest



Centre Co., PA (WJAC) — PennDOT recently released its latest update on the State College Connector Project in Centre County and says there are still other options available besides the three labeled in the report on where the new road will be built.

PennDOT issued a draft report last week on the project.

The connector will be the new roadway to link eastern Centre County, Potters Mills, with the Centre region near Boalsburg.

Currently, that road is Route 322, but PennDOT emphasizes that they're studying the entire area, which includes nearby Routes 144 and 45.



The PEL-report goes into detail on how PennDOT narrowed their [possible new route options down to three](#), but the project manager previously said that the final choice for a new route has yet to be determined.

“The final alternative recommended during the next phase could be a combination of alternatives. Or simply a slight variation of one of the alternatives.”

Now, PennDOT will be conducting further detailed studies of the project area, which will include more meeting with landowners.

They've already heard a lot of feedback, especially from farm owners whose properties may be impacted.

There are also more traffic studies being conducted, including on a possible connector road between Routes 322 and 45.

Public comment on the new PEL draft report is open through March 19th.

PennDOT says narrowing down the State College connector route options to a final choice is still more than a year away.

## APPENDIX E – Draft PEL Study Report Public Comments and Responses



Draft PEL Study Report Public Comments and Responses Index

Last Name	First Name	Comment Page #	Response Page #
Albertson	Donald	1	1
Bigatel	Alan	3	5
Centre County Historical Society		7	7
Centre County Metropolitan Planning Organization		13	13
Centre County Metropolitan Planning Organization		17	17
Clitherow	Mike	24	24
Collins	John	27	32
Dean	Ethan	34	35
Derstein	Mary	37	37
Dieken	RJ "Deke"	38	39
Environmental Protection Agency		38	40
Foreman	Ellen	43	43
Foust	Dennis	46	46
Fowler	Chris	48	49
Fowler	Lara	51	53
Gould	Thomas	56	56
Gustafson	Marjorie	57	57
Hansen	Matt	59	59
Harden	Frank	60	62
Hartzell	Mara	65	65
Herndon	Matt	66	66
Herron	Alexander	68	69
Ho	Julia	71	71
Jackson	Henry	73	73
Knoll	Bruce	76	76
Krentzman	Stephen	77	77
Miller	Thomas	79	80
N.	Peggy	82	82
Nittany Valley Environmental Coalition		82	84
No 45 Connector Movement and Hidden Lake Owner's Association		106	108
Parks	Nancy	114	115
Pennsylvania Farm Bureau		116	118
Saidis	Robert	121	125
Schenker	Guy	127	128
Scherr	Adam	129	130
Schwier	BT	132	133
Sekula	Thomas	135	136

Last Name	First Name	Comment Page #	Response Page #
Sentesy Wagner	Mark	138	139
Sheeder	Scott	142	142
Shutt	Jen	143	143
Smith	Fritz	145	145
Smith	Michael	147	148
Steff	Jim	150	151
Stetson	Jeff	154	154
Swim	Janet	138	139
Will	Amy	142	142

PennDOT thanks all commenters for being actively engaged in the SCAC PEL Study. PennDOT will utilize the input provided by the public and Cooperating and Participating Agencies to inform the analysis and design during the preliminary engineering and environmental studies (National Environmental Policy Act [NEPA]) phase.

**Commenter:** Albertson, Donald

From: Donald Albertson [REDACTED]  
Sent: Friday, March 3, 2023 1:03 PM  
To: Ball, Dean D <deball@pa.gov>  
Subject: [External] 322 connector etc.

Mr. Ball:

I have read the recent publication describing alternatives to complete the connection between 322 when it comes down off the Seven Mountains at Potters Mills. So far, PennDOT has done a remarkably good job of dealing with other narrowing obstacles such as the area between Millroy and Reedsville and Lewistown and Mifflintown. I drove that stretch often between 1984 and 1989 and the upgrade is not nearly so white-knuckle as before. I have also commuted between the Penns Valley area into State College since 1997 mostly along Route 45 although I did use 322 during Grange Fair when traffic in the Old Fort area was heavy.

DA-1

Based on my experience, any alignment that would increase the load on 45 is a bad idea. Traffic on 45 is increasing and few drivers are willing to comply with the posted speed limits which are treated as recommended minimums rather than safe maximums. Adding a connection between 322 and 45 would not be safe without a traffic light. The current exit ramp from 322 to 45 has a traffic light and any connection further east would require similar controls. Keeping the posted speed at 45 between Old Fort and Boalsburg would probably be necessary as well.

DA-2

The way that access to Crowfield/Decker Valley roads was implemented could act as a model for access to existing houses and businesses in the current 322 corridor. Especially to allow farm equipment to access field if any farmland is broken up.

DA-3

I am fortunate that, having retired in 2021, most of my travel is not during peak hours; I plan my days to avoid heavy traffic periods including traffic on 45 for Penn State football home games. I know a number of alternatives using SR and local blacktops. I have noticed increased usage of those as well. They are becoming increasingly hazardous for cyclists, pedestrians, and the plethora of horse-drawn vehicles in Penns Valley and Brush Valley. Taking a view from the top of Nittany and Poe Mountains suggests that the maximum speed on 45 and 192 be reduced to 45 and the maximum speed on the 2-lane blacktops be 35 or even 30. Of course, posted limits without enforcement become suggestions.

DA-4

Regards,

Donald Albertson Gregg Township Centre County (Spring Mills village district)

## Response:

DA-1: Thank you for your comment.

DA-2: PennDOT understands the concerns regarding the PA 45 connector. PennDOT is committed to conducting more detailed traffic analyses to evaluate the US 322 to PA 45 connection. Under any of the Build Alternative scenarios (US 322-1OEX, US 322-1S, or US 322-5), should the traffic analyses indicate that a connector is necessary to improve mobility and aid the State College Area Connector project in meeting the defined transportation purpose and need, PennDOT will include the US 322 to PA 45 connection. PennDOT will work with the townships

and area residents to minimize impacts to the surrounding community. Additionally, should the associated analysis show that the Build Alternative, with the connector, adversely impacts conditions on PA 45, PennDOT would incorporate necessary improvements into the project. Conversely, if the analyses determines that a US 322 to PA 45 connection is not necessary to improve mobility and aid the State College Area Connector project in meeting the defined transportation purpose and need, the connection will be removed from the project.

DA-3: A Farmland Assessment Report will be prepared during the preliminary engineering and detailed environmental study (National Environmental Policy Act [NEPA]) phase of project development. Information obtained during the farmland assessment will assist in determining the means and methods for maintaining access for farm operations and providing local roadway, residential, and business access.

DA-4: Traffic analysis of the US 322 Build Alternative scenarios indicates traffic shifts will occur that will result in net decreases in traffic on the overall surrounding local roadway network. As the project continues to advance, PennDOT will continue to refine traffic volume projections and traffic analyses through the NEPA phase to ensure the project and associated improvements will meet design standards. PennDOT designs and operates the roadway network in accordance with design standards and specifications as outlined in various manuals approved by FHWA for the design speed, safety features, and other requirements for a transportation facility. While speed enforcement is always a concern when considering the safety of the traveling public, it is not under PennDOT's purview and specific concern areas should be addressed with state and local law enforcement. Additionally, increased law enforcement on the roadway network alone will not meet the identified purpose and need of the PEL Study.

**Commenter:** Bigatel, Alan

Dean Ball, P.E.  
Project Manager  
70 PennDOT Drive  
Clearfield, PA 16830

March 15, 2023

Alan Bigatel, P.E.  
[REDACTED]  
[REDACTED]

RE: Draft Proposed Environmental Linkages Report of February 2023.

Dear Mr. Ball,

After reading the draft PEL Report, I respectfully submit the following comments:

**1. PEL Process**

\* I believe that the PEL process was applied improperly – the environmental field work necessary to identify Exception Value (EV) Wetlands, Unnamed Tributaries (UNT's), and sinkholes especially in wooded areas should have been done first. Then, alternatives could have been designed to avoid and minimize the impacts to those features.

\* Six of the nine alternatives were eliminated before any environmental field work was done.

\* Because the "E" in PEL stands for environmental, the environmental field work should have been completed before decisions were made on alternative alignments. Section 6 of the report says that the alternative selection "considers the environment, community, and economic goals....". If all EV wetlands and EV streams had been mapped, the decision process would have likely picked other alternatives. Two of the chosen alternatives will require a very complicated and long-term effort to obtain a joint 404-105 permit and will probably require significant mitigation wetlands construction.

\* Regarding the alternative comparisons in section 6, alternatives U. S. 322-5 and U. S. 322-1S would have had unacceptable scores if all EV wetlands and EV streams had been mapped. A fully informed decision at this time is very important. It could avoid costly redesign and remedial work during and after construction.

AB-1

**2. The chosen alternatives are the closest to two Exceptional Value Streams, High Quality Coldwater Fisheries with natural trout reproduction - Spring Creek and Sinking Creek.**

Spring Creek

\* The headwater area of Spring Creek gets its recharge of cold water from Tussey Ridge to the south via UNT's and EV wetlands.

\* Spring Creek is perennial at its source near the Harley Davidson Shop and the Wheatfield Nursery. It has a clearly defined channel with rocky substrate and many taxa of macroinvertebrates, including stonefly, caddis, and freshwater shrimp.

\* The perennial reach of Spring Creek starts above the bridge on U.S. 322 at LRS 14/0322/0660/0000 adjacent to the Nursery.

AB-2

\* In early March, 2023, flow on the surface was observed from Spring Creek's source down to Galbraith Gap Run.

\* Wetlands such as the one at the bridge on U.S. 322 at LRS 14/0322/0640/2343 would be considered Exceptional Value.

\* Many sinkholes exist between Tussey Ridge and existing U.S. 322. They occur where water flowing over the shale rock layer hits the limestone soil and karst geology then flows subsurface to Spring Creek. Tussey Sink near Taylor Hill Road is one example of these sinkholes.

\* Any alternative route south of Spring Creek would affect the headwaters of this world famous trout stream. A route to the north of and parallel to Spring Creek would have far less environmental impact. Please remember that there can be no construction work close to Spring Creek or its UNTs from October 1 to April 1.

#### Sinking Creek

\* There is a complex system of EV streams and EV wetlands in the Colyer Area between Tussey Sink (Taylor Hill Road) and the end of the four lane section of U.S. 322 near Potters Mills.

\* Many of these streams and wetlands are not mapped on NWI or PASDA. All of these UNTs and wetlands are tributary to Sinking Creek and are thus EV streams and wetlands. Preliminary environmental field work is finding many more acres of EV wetlands and many more UNTs than shown in the draft PEL Report. Avoiding these EV streams and wetlands may complicate design of several suggested routes.

\* There are remnants of an old road used to haul cast iron from Centre County iron furnaces in the 1700's and 1800's to Potters Mills and the Pennsylvania Canal at Lewistown. This road ran to the north of Spring Creek avoiding the wetlands and UNTs to the south. The road crossed Sinking Creek and two wetland systems at places with high banks and narrow channels. While not designed to minimize environmental impacts, it kept the loaded wagons out of the mud.

AB-2

In conclusion, my concern is that without first mapping all of the EV streams, EV wetlands, and sinkholes, a meaningful choice of the best alternatives cannot be made. Field work on mapping the EV wetlands tributary to Sinking Creek is starting this spring. Field work on the UNTs and EV wetlands tributary to Spring Creek will be done this spring and summer. This environmental information has not been integrated into the engineering analysis. After the important environmental information has been collected, the engineering analysis can be completed taking into consideration the costs and environmental aspects of building a roadway that avoids and minimizes impacts to the EV wetlands and HQ streams. Please consider waiting until the "E" in PEL is complete before making decisions on the best alignments.

AB-3

If you have any questions, please feel free to contact me.

Sincerely,



Alan Bigatel, P.E.

## Additional Comments

### Engineering Technical Memo

In the Engineering Technical Memo, considerations of avoiding and minimizing impacts to the High Quality streams and Exceptional Value (EV) wetlands have not been incorporated into the engineering designs. It appears that this section was not integrated with the environmental section. Changing the designs to incorporate the environmental considerations will alter the designs considerably and affect the costs and timetables.

AB-4

In section 3.1.1 near the end of the first paragraph, the sentence refers to crossing over Spring Creek. Should this be Sinking Creek? Throughout section 3.1.1 reference is made to crossing the stream near Dogtown Road. This stream is Sinking Creek, not Spring Creek. Also, the Potter Twp. Road near Tusseyville is Neff Road, not Nerf Road.

### Threatened and Endangered Species

Bald Eagles and Osprey have been observed using Colyer Lake as a feeding area. The forested wetlands along Sinking Creek are possible nesting sites for these bird species.

Many Shag Bark Hickories along the North Flank of Tussey Ridge give shelter to Indiana Bats during the roosting season. Disruption of the potential roosting sites during highway construction would be limited to the winter months.

AB-5

Timber Rattlesnakes are known to den on the southeast flank of Tussey Ridge. The males travel several miles from the den and could be run over on the southern alignments.

### Historic Resources

There are many historic houses and barns in the U.S. 322 corridor and in the Penns Valley section of the study area that are not listed in the historic resources section. These resources should be added to this section before alignments are chosen.

AB-6

In the 1800's there were six schoolhouses in the Colyer area. At least two of these are standing today, one as a private residence and one as a seasonal camp.

## **Response:**

AB-1: Environmental resources were identified through the review of secondary source information. The study methods and approach were coordinated through and concurred by the regulatory agencies. Detailed field studies are not typically part of the PEL process given it is a planning study. Secondary source data and some field reconnaissance were used to determine locations of resources. As detailed field studies progress through the National Environmental Policy Act (NEPA) phase of the project, the preliminary proposed corridors can be adjusted as necessary to avoid and minimize impacts to resources. Detailed engineering will occur during the NEPA phase.

Each project corridor was evaluated with respect to its potential impact on watersheds, streams, and wetlands. There are special protection waters and wetlands throughout the Project study area. Each of the corridors crosses through headwater and midstream portions of the different watersheds. PennDOT coordinated with the natural resource agencies and the public as part of its evaluation process to identify the project corridor that minimizes impacts to these special protection water resources.

AB-2: Thank you for the information.

AB-3: Thank you for your comments. Detailed field studies and preliminary engineering will occur during the NEPA phase of the project.

AB-4: See response to AB-1.

The references to Spring Creek have been corrected to Sinking Creek, and the spelling of Neff Road has been corrected in the Engineering Technical Memorandum.

AB-5: Thank you for the information. Identifying nests and habitat of threatened and endangered species will be done during the NEPA phase of the project. As detailed field studies progress through the NEPA phase of the project, the preliminary proposed corridors can be adjusted as necessary to avoid and minimize impacts to resources. Detailed engineering will occur during the NEPA phase.

AB-6: Above Ground Historic Structures surveys will be completed during the NEPA phase of the project and structures over 50 years of age will be evaluated for eligibility on the National Register of Historic Places. As detailed field studies progress through the NEPA phase of the project, the preliminary proposed corridors can be adjusted as necessary to avoid and minimize impacts to resources. Detailed engineering will occur during the NEPA phase.



**Commenter:** Centre County Historical Society



CENTRE COUNTY HISTORICAL SOCIETY

March 19, 2023

Dean D. Ball, P.E., Assistant District Engineer - Design  
PA Department of Transportation, Engineering District 2-0  
70 PennDOT Drive  
Clearfield, PA 16830

Re: March 2023 Draft SCAC PEL Study Comment

Dear Mr. Ball:

Thank you for the opportunity to comment on the draft SCAC PEL Study.

The Centre County Historical Society (CCHS) is working with Dr. Paul Daniel Marriott, Associate Professor of Landscape Architecture in the Stuckeman School at Penn State and the LARCH 414 studio class. We began this collaboration in an effort to better understand context sensitive solutions that exist for Route 322 corridor between Potters Mills and to share that understanding with citizens and organizational stakeholders. To that end, CCHS was involved in co-hosting three public meetings with the Stuckman fall 2022 to engage the public in discussion about SCAC.

In addition to this, representatives from CCHS, Dr. Marriott and students from the LARCH 414 class attended PennDOT's public meeting in October and the joint meeting of Harris and Potter Townships held October 4, 2022 to hear what residents had to say about the potential impact of the SCAC on their townships.

As an outgrowth of these efforts and the collaboration between Department of Landscape Architecture in the Stuckeman School at Penn State, the Historical Society and the Hamer Center for Community Design, a public resource guide was created. *Rethinking 322, Strategies for the State College Area Connector in Penns-Brush Valley* booklet is the final student project of LARCH 414 and emphasizes context sensitive design. This resource has been shared with PennDOT and the public and may be accessed on CCHS's website: [centrehistory.org/connector](http://centrehistory.org/connector).

Our comments reflect and have been directly informed by this collaboration that emphasizes the importance of context sensitive landscape architecture concepts in designing highways.

In the draft PEL study, the executive summary leads with a powerful statement that is repeated: "A PEL is a high-level planning approach to transportation decision-making that considers environment, community and economic goals early in the transportation planning process. A PEL

Study promotes a collaborative and integrated process,” a guiding philosophy to remember for the State College Area Connector.

From our understanding of the DRAFT PEL Study, a high-speed limited-access freeway appears to be only solution that PennDOT is considering for the US 322 corridor alternatives in Penns-Brush Valley. These alternatives primarily benefit high-speed through traffic and heavy truck traffic.

Alternative design considering lower speeds, traffic calming, multi-modal options and multiple cross sections naturally reduce speed and concentration of concrete and asphalt. This benefits local residents with a safe and efficient road designed for local as well as through traffic.

CCHS-1

The Route 322 corridor between Potters Mills and Boalsburg has a high concentration of historic, cultural, agricultural, and environmental resources and residential areas that would benefit from a lower speed road making it suitable for local as well as through traffic.

The Penns-Brush Valley Rural Historic District Eligible Nomination is well defined with historic resources and viewsheds identified within it. But there are areas of concern just outside of this at the confluence of the SCAC and the Mount Nittany Expressway in Boalsburg including the Michael Jack Estate at 1301 E. Boal Ave. This site is not currently listed on the National Register of Historic Places, but two earlier Determination of Eligibility documents exist. This site is significant architecturally to Centre County’s earliest history and we strongly advocate for its preservation in the SCAC along with the residential neighborhood near it.

CCHS-2

We recognize that the PEL is an early assessment of impacts to such resources and that more specific impacts will not be known until more detailed engineering is undertaken during the NEPA process. We will continue to monitor progress through this phase.

We urge PennDOT to:

- Take advantage of flexibility in highway design to avoid environmentally, historically, and culturally sensitive areas. The location of the final route should include mitigation strategies to shift the alignment or invest in meaningful structural systems that protect these resources.

CCHS-3

- Alternative roadway designs to improve safety and efficiency have not been offered as alternatives design options. Consideration for a parkway model, a lower-speed limited access corridor with traffic calming strategies should be part of the discussion. See the section the “Flexibility in Design” section in *Rethinking 322, Strategies for the State College Area Connector in Penns-Brush Valley*.

CCHS-4

- Identify how noise pollution associated with increased truck traffic and compression release brakes would be addressed. According to the FHWA website, a form or quieter pavements is a possible solution among other mitigation strategies.

CCHS-5

- Provide more detailed statistics for truck traffic particularly. Without knowing whether the through truck in the Centre Region is traveling from Harrisburg to Altoona, or Baltimore to Chicago (using 322 to avoid tolls on the PA Turnpike) it is difficult to accurately assess the need for future traffic within such a limited study area. Is a new SCAC freeway link the only way to meet the needs of truck traffic?

CCHS-6

- How does the Level of Service discussed on page 21 of the PEL address multi-modal uses? What does the SCAC define as current unacceptable LOS ratings? As shown in Figure 3-3, the current

CCHS-7

CENTRE FURNACE MANSION

1001 East College Avenue • State College, Pennsylvania 16801 • 814-234-4779 • centrehistory.org

Route 322 corridor under study by the SCAC would operate at a level E-F in 2050. This means that if NO changes were made to the road, the LOS would be unacceptable in 2050. However, it does not address or consider other non-freeway options that could significantly improve the LOS such as traffic calming or limited access parkway.

CCHS-7

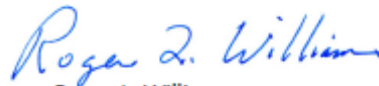
We would also like to reiterate from our comment in October 2022 that the State College Area Connector transportation project is the gateway to the Commonwealth's leading public institute of higher education and research as well as a major economic engine. We feel that it deserves the treatment that respects its history and values – and considers environment, community and economic goals. This project is worthy of being an outstanding national example of contextually and environmentally sensitive design for, not only citizens of Centre Region and the University Community, but for PennDOT's own stature in execution of this important project.

CCHS-8

Respectfully submitted on behalf of the Centre County Historical Society Board of Governors,



Mary Sorensen  
Executive Director



Roger L. Williams  
President

THE CENTRE COUNTY HISTORICAL SOCIETY BOARD OF GOVERNORS

<i>Roger L. Williams, President</i>	<i>Jacqueline R. Esposito</i>	<i>Ford Risley</i>	<i>Jacqueline J. Melander,</i>
<i>Robert B. Hazelton, Vice President</i>	<i>Ann Moellenbrock</i>	<i>Ann Hamilton Taylor</i>	<i>President Emerita</i>
<i>Beverly Lipski, Treasurer</i>	<i>Alan Popovich, AIA</i>	<i>Jeffrey M. Bower, Emeritus</i>	<i>Beth Ricker, Emerita</i>
<i>Deborah McManus, Secretary</i>	<i>Robert W. Potter</i>	<i>Robert B. Donaldson, Jr., Emeritus</i>	<i>Ralph Seeley, Emeritus</i>
<i>Rebekah Dreese</i>		<i>Carol Gentry, Emerita</i>	<i>Leon J. Stout, Emeritus</i>
		<i>Steven Gentry, Emeritus</i>	

CENTRE FURNACE MANSION

1001 East College Avenue • State College, Pennsylvania 16801 • 814-234-4779 • [centrehistory.org](http://centrehistory.org)

**Commenter:** Centre County Historical Society

**Response:**

CCHS-1: Chapter 4 of the Draft PEL Study report outlines the alternative screening process utilized for this study and Chapter 6 presents the results of the screening process. Based on the information collected and analysis completed, the US 322-1OEX, US 322-1S, and US 322-5 Build Alternative corridors were determined to best meet the transportation purpose and need identified in Chapter 3 from a traffic, engineering, environmental, and planning perspective. The advancement of any of these alternatives would provide benefits to local as well as regional travelers. Regional travelers would benefit by having a consistent travel experience with limited stoppage for local access movements. The local travelers would benefit as nearly 53% of all future traffic and 73% of truck traffic would be located onto the new facility, thus providing more efficient movement on the local roadway system. Additionally, travel safety would be improved on the local roadway network. Under any of the US 322 Build Alternatives, predicted crashes decreased on study area roadways due to the diverted traffic volumes, with existing US 322 having the largest decrease. Within the study area, the overall number of crashes would be reduced by approximately 18% and fatality/injury crashes would be reduced by approximately 22%.

As mentioned in Chapter 8, multimodal and other improvements identified in the PEL Study would be considered for advancement as independent projects to be planned and advanced as funding is identified and allocated.

CCHS-2: The State College Area Connector study area is home to many historic resources including the Penns-Brush Valley Historic District and the Michael Jack Estate. The Michael Jack Estate was determined eligible for listing in the National Register of Historic Places (NRHP) by the Pennsylvania Historical and Museum Commission (PHMC, the State Historic Preservation Office) in 1981. The PHMC reaffirmed the property's eligibility in 2004. PennDOT is committed to avoiding and minimizing impacts to these resources to the extent practicable, however, until the design is completed, and the right-of-way needs are determined, PennDOT cannot confirm that there will be no impacts to the Michael Jack Estate, or other study area historic resources. For the PEL Study, PennDOT collected all known information regarding above-ground historic resources within the study area to use in developing corridors that best avoid or minimize impacts to these known sites. Currently, PennDOT is conducting a historic resources reconnaissance survey of all buildings constructed prior to 1981 to identify additional potential historic resources within a refined study area. Once that is complete, PennDOT will work with the PHMC to determine eligibility for sites identified in the reconnaissance survey that do not have an official historic eligibility determination. Following the eligibility determinations, PennDOT will evaluate additional modifications to the alternative to further avoid or minimize impacts. Once the alternative refinement is complete, an effects determination will be made to determine the project's potential impact on those historic resources listed or eligible for listing in the NRHP. The effects determination will include an analysis of direct impacts and indirect (viewshed) impacts, considering each resource's historic character and area of significance. Through coordination with PHMC and identified consulting parties, measures to mitigate any adverse impacts will be developed and implemented through a Programmatic Agreement.

CCHS-3: As design advances, PennDOT will consider design solutions that aid in minimizing the footprint of the proposed facility, thus minimizing the overall impacts. Additionally, the identification of conceptual mitigation will begin during the preliminary engineering and detailed environmental phase of project development and be coordinated with the resource agency and the public. The mitigation will be designed to address impacts from the proposed project.

CCHS-4: A “parkway concept” or as discussed in the PEL Study, an Upgrade of Existing Alternative would not fully address the purpose and need for this study. The mix of traffic (truck and automobiles and local and regional traffic) creates conflicts that even at lower speeds would have the potential for increasing crashes, as seen in detail in the *Traffic Analysis Technical Memorandum*. Traffic calming measures and other design considerations could be considered for the remaining local roadways, as necessary or desired.

CCHS-5: Noise will be evaluated as part of the preliminary engineering and detailed environmental study (National Environmental Policy Act [NEPA]) phase of the project development process. During this phase, PennDOT will conduct a Preliminary Design Highway Traffic Noise Assessment for the proposed alternatives. State and Federal Guidelines require PennDOT to use a standardized process to identify locations where abatement is potentially warranted, feasible, and reasonable considering peak hour noise levels and the potential effectiveness of noise abatement measures. Predicted traffic volumes and composition (e.g., car and truck) are considered during the evaluation process. This process includes the following steps:

1. Identify land uses within the project area that are sensitive to noise, such as homes and parks.
2. Monitor existing noise levels and develop acoustical models to predict future conditions.
3. Evaluate predicted future noise levels after the highway project is constructed and identify locations where noise impacts are anticipated.
4. Consider noise abatement where noise impacts are anticipated.
5. Identify areas where preliminary noise abatement is potentially warranted, feasible, and reasonable.

The Noise Assessment will be reevaluated in the Final Design process before final determinations regarding potential noise abatement designs are made for the project.

Step 3 in the noise process would include consideration of the predicted traffic volumes and composition (e.g., car and truck). Additionally, highway traffic noise is typically abated by installing noise walls that are voted on by the local neighborhood relative to implementation, design, and color. Noise wall design is determined during final design activities.

CCHS-6: As summarized in the PEL Study and further explained in the *Traffic Analysis Technical Memorandum*, an origin and destination study was conducted at the start of the study to understand existing travel patterns and travel demand, and to aid in traffic forecasting. Essentially, this study provided insight on where vehicles traveling on the study area road network are coming from or going to. Figures 2 through 6 of this technical memorandum illustrate how various vehicle types are traversing in the area. For example, nearly 59% of heavy truck trips headed west on

US 322 are destined to points west on I-80 (e.g., Erie, Chicago, etc.) and 8% of heavy truck trips headed west on US 322 are destined to points south on I-99 (e.g., Altoona, etc.). This information was included in the alternative screening process for this PEL Study.

CCHS-7: Level of Service (LOS) discussed on page 21 in the PEL Study is modal specific to motorized vehicles that measures the available roadway capacity and the density of existing traffic using that roadway (i.e., congestion). Typically, roadways are not designed to operate at LOS A during peak conditions, but instead provide a lower LOS that balances costs and other impacts. This area consists of both rural and non-rural areas. For rural areas LOS A through LOS C is considered acceptable operation and unacceptable operation is considered LOS D through LOS F. For non-rural areas, LOS A through LOS D is considered acceptable operation and unacceptable operation is considered LOS E and LOS F. For purposes of this PEL Study, Harris and College Township are considered urban and the remaining municipalities are classified as rural. In 2050, if no improvements are completed, numerous roads throughout the study area would have unacceptable LOS. Traffic calming solutions are generally more safety improving measures and are not related to improving capacity (i.e., congestion). Therefore, these types of measures would not address LOS deficiencies in the future. Unless the configuration of the limited access parkway would increase the number of lanes to add capacity, LOS deficiencies would not be addressed in the future.

CCHS-8: PennDOT will continue to work with the local communities to advance the project and include context sensitive measures, accordingly. Additionally, as detailed field studies progress through the NEPA phase of the project, the preliminary proposed corridors can be adjusted as necessary to avoid and further minimize impacts to resources.

**Commenter:** Centre County Metropolitan Planning Organization (Comment 1 of 2)

**Centre County Metropolitan Planning Organization (CCMPO)**

c/o Centre Regional Planning Agency  
2643 Gateway Drive, Suite #4  
State College, PA 16801  
Phone (814) 231-3050 / FAX (814) 231-3083  
[www.ccmppo.net](http://www.ccmppo.net)

Centre County Planning and Community Development Office  
Willowbank Office Building  
420 Holmes Street  
Bellefonte, PA 16823-1488  
Phone (814) 355-6791 / FAX (814) 355-8661  
[www.centrecountypa.gov](http://www.centrecountypa.gov)

Mr. Dean Ball, P.E.  
Project Manager, SCAC  
PennDOT District 2  
70 PennDOT Drive, Clearfield, PA 16830  
Clearfield, PA

RE: State College Area Connector Draft PEL Study

Dear Mr. Ball:

The Centre County Metropolitan Planning Organization appreciates the opportunity to review the draft State College Area Connector (SCAC) Planning and Environmental Linkages (PEL) Study and associated documents. As a courtesy, we offer the following listing of minor comments and errata from the draft study.

While none of the issues, notes, and changes below are expected to have a large impact on the finalization of the PEL Study or detract from the high level of quality present in the study and associated documents, addressing them may improve the clarity of the final document and increase its utility in advancing the project.

Page 6, Section A, Paragraph 2 -- FHWA PEL questionnaire does not appear in the online technical files.	CCMPO-1
Page 14, Section C, Paragraph 1 – L RTPs have a minimum planning horizon of 20 years. Centre County’s currently covers 30, but that is not always and may not always be the case. Suggest reflecting the regulatory minimum planning horizon of 20 years in the PEL document instead.	CCMPO-2
Page 17, Section B.1. --The crash history and predicted crash rate appears to need additional explanation since it is difficult to identify if these crash rates are outside the acceptable crash rates due to the anticipated traffic growth.	CCMPO-3
Page 19, Section B.2.a--Trip generation doesn’t explain disparity between regional and local trips on Route 45. The Traffic Analysis Technical Memorandum notes that this indicates that return trips are spread across various roadways. A brief explanation of these phenomena and potential implications on alternatives selection or development may be helpful.	CCMPO-4
Page 22, Section B.2.d.--Bicycle Level of Service should highlight corridors similar to how Section B.2.c. Roadway Level of Service notes corridors.	CCMPO-5
Page 23, Section B.3. --Can the last sentence on this page related to “may create potential safety concern” be explained a bit more?	CCMPO-6

SCAC Draft PEL Study – Minor CCMPO Comments  
March 17, 2023  
Page 2

<p><b>Page 25 Section A.3.</b>—This section seems a bit brief considering the Transportation Control Measures Alternatives can complement the overall project. Last paragraph does not mention active transportation.</p>	CCMPO-7
<p><b>Page 38, Bullet List 2, Bullet 2</b> – Lemont Elementary School is no longer a public school facility for SCASD. The building is now in service as New Story Schools – State College. This school was “licensed in 2021 to provide educational and behavioral services to students in grades K-12 in and around Blair, Centre, Clearfield, and Clinton counties.” Operations at the former Lemont and Houserville Elementaries have been combined into Spring Creek Elementary at the Houserville site.</p>	CCMPO-8
<p><b>Page 63, Paragraph 2</b> – Were public transit and ridesharing activities included as part of the multimodal perspective? If so, suggest stating this. If not, why not?</p> <p><b>Page 64, Paragraph 2</b> – Were public transit and ridesharing activities included as part of the multimodal perspective? If so, suggest stating this. If not, why not?</p>	CCMPO-9
<p><b>Page 70, Section 2, Bullet List</b> – Were public transit agencies such as CATA and the Centre County Office of Transportation specifically and individually included in outreach efforts? If so, suggest stating this. If not, why not?</p> <p><b>Page 70, Section 2, Bullet List</b> – Were public transit agencies such as CATA and the Centre County Office of Transportation specifically and individually included in outreach efforts? If so, suggest stating this. If not, why not?</p>	CCMPO-10
<p><b>Chapter 7, Tables, General</b> – Tables are labeled 7-1, 7-2, 7.3, 7.4. Suggest consistency here.</p>	CCMPO-11
<p><b>Multiple pages</b>—Maps note in the legend “Municipality” when it should indicate “Municipality/Borough.” Townships, boroughs and counties are all municipalities, the desired meaning here seems to be “Borough”.</p>	CCMPO-12

The members and staff of the CCMPO appreciate this chance to provide comments, and we look forward to working with the team in future phases of the transportation project development process.

Sincerely,



James R. Saylor, P.E., PTOE  
Principal Transportation Planner

cc: CCMPO Technical Committee  
CCMPO Coordinating Committee  
Ray Stolinas, CCPCDO Director  
Tom Zurat, PennDOT District 2-0 District Executive



**Commenter:** Centre County Metropolitan Planning Organization (Comment 1 of 2)

**Comment Response:**

CCMPO-1: The PEL Questionnaire will be uploaded to the study website.

CCMPO-2: Changes will be made to the Final PEL Study report, as requested.

CCMPO-3: Through coordination with Federal Highway Administration (FHWA), PennDOT revised *Publication 319 Needs Study Handbook*. The revised handbook states, "FHWA and PennDOT are moving away from using crash rates for safety analysis because: (1) crash rate results are heavily skewed in areas with very high or very low AADT; and (2) the Highway Safety Manual (HSM) analysis procedures for crash frequency are more statistically robust. Crash rates may still be used when HSM models are not available, but they are being superseded by the Highway Safety Manual (HSM) analysis...". An HSM analysis was conducted for the State College Area Connector PEL Study, and the results are summarized in the Draft PEL Study report and further explained in the *Traffic Analysis Technical Memorandum*. The PEL Study HSM analysis of crash history and predicted crash frequencies was used to provide a consistent methodology for a quantitative evaluation of the study alternatives.

CCMPO-4: The disparity between regional and local trips on PA 45 is likely due to congestion/delays and unreliable travel times experienced on this route at times which leads to motorists finding other more reliable route(s) to complete their trip. These patterns are likely to continue unless an improvement/alternative provides an improved alternative route (i.e., reduced travel time).

CCMPO-5: The results of the Bicycle Level of Service (BLOS) analysis are presented on page 22 of the Draft PEL Study report. More details regarding the BLOS analysis of specific roadway segments may be found in Table 5 of the *Traffic Analysis Technical Memorandum*.

CCMPO-6: The Final PEL Study report will be updated in Section B.3 to further describe potential safety concerns where roadway configuration and geometric deficiencies do not meet driver expectations. Drivers traveling at a higher rate of speed appropriate for the design speed in non-deficient sections of the highway may not recognize the changes in roadway configuration and slow to an appropriate speed to navigate the changing roadway conditions, thus creating potential safety concerns.

CCMPO-7: This section is brief as it is designed to only provide an introduction into what the alternative could include. Active Transportation was omitted and will be included in the last paragraph.

CCMPO-8: Thank you for the updated information. The WebMAP and PEL Study will be updated to reflect this change in Lemont Elementary School.

CCMPO-9: For the purpose of the planning analysis, only bicycle and pedestrian modes were considered, as PennDOT could directly include facilities to improve connectivity in the area of the proposed alternative.

CCMPO-10: Direct coordination with the CATA or the Centre County Office of Transportation was not included as part of this PEL Study. These entities are represented as part of the CCMPO Technical and Coordinating Committees. Coordination with these committees is conducted generally on a bi-monthly basis.

CCMPO-11: Table numbers will be updated in the Final PEL Study report.

CCMPO-12: Map legends will be updated accordingly in the Final PEL Study report.

**Commenter:** Centre County Metropolitan Planning Organization (Comment 2 of 2)

Centre County Metropolitan Planning Organization (CCMPO)

c/o Centre Regional Planning Agency  
2643 Gateway Drive, Suite #4  
State College, PA 16801  
Phone (814) 231-3050 / FAX (814) 231-3083  
[www.ccmppo.net](http://www.ccmppo.net)

Centre County Planning and Community Development Office  
Willowbank Office Building  
420 Holmes Street  
Bellefonte, PA 16823-1488  
Phone (814) 355-6791 / FAX (814) 355-8661  
[www.centrecountypa.gov](http://www.centrecountypa.gov)

Mr. Dean Ball, P.E.  
Project Manager, SCAC  
PennDOT District 2  
70 PennDOT Drive, Clearfield, PA 16830  
Clearfield, PA

RE: State College Area Connector Draft PEL Study

Dear Mr. Ball:

The Centre County Metropolitan Planning Organization appreciates the opportunity to review the draft State College Area Connector (SCAC) Planning and Environmental Linkages (PEL) Study and associated documents. The CCMPO offers the following comments on the documents posted:

1. The CCMPO supports the purpose statement developed as part of Planning and Environmental Linkages (PEL) Study, and the specific needs statements developed, focusing on reducing congestion, improving safety, and improving system continuity. The CCMPO concurs that these statements were reasonably derived from previous planning work and a survey of existing conditions.

The CCMPO notes that these needs are consistent with the goals and objectives developed as part of the CCMPO Long Range Plan 2050. In particular, the recommended alternatives carry the potential to reduce crashes, reduce conflicts between motorized and non-motorized transportation modes, reduce congestion, improve Levels of Service, improve or establish new intermodal connections, improve access for freight, and minimize or mitigate negative impacts to agricultural lands and historic and cultural resources.

In addition, the SCAC is included as a funded project in the major CCMPO transportation plans, including the Transportation Improvement Plan (TIP), Twelve Year Plan (TYP) and Long Range Plan 2050.

CCMPO-1

2. The CCMPO commends PennDOT for embracing the Planning and Environmental Linkages (PEL) process. While the approach has presented challenges for the project team and stakeholders alike, CCMPO commends the team on the amount of information brought into the process, and the opportunities presented for coordinating with resource agencies, municipalities, and stakeholders in early stages of the project development process.

This approach has allowed for the early consideration of a broad range of data, early involvement of participating agencies, and has incorporated needs identified through the regional planning process including the protection of historic rural communities, preservation of agricultural resources, and the need to consider multi-modal concerns while addressing safety, congestion and connectivity needs throughout the study area.

CCMPO-2

3. The CCMPO further appreciates the approach of using the information available through the PEL process to develop and evaluate a range of alternatives, and allowing for the elimination of alternatives that fail to meet the purpose and needs established early in the transportation planning process. We acknowledge that the information provided through the PEL process illuminated issues that would have made permitting and construction of several of the alternatives infeasible, and we support the further development of the recommended alternatives through the National Environmental Policy Act (NEPA) phase of the transportation project development process.

CCMPO-3

4. The CCMPO supports construction of a refined alternative to be determined through the NEPA process as a top priority for the CCMPO. While the MPO concurs with the statement that “no single alternative is likely to address every type of transportation issue within the entire PEL study area”, the CCMPO concurs with the advancement of the US 322-1OEX, US 322-1S and US 322-5 alternatives for further study in the NEPA phase of the process.

CCMPO-4

The CCMPO offers the following areas of concern to be considered in the refinement of the identified alternatives:

a. Based on the Summary of Environmental Resources for the Build Alternative Corridors, the recommended alternatives may include higher impacts in terms of stream crossings and acres of potential ponds and lakes, as well as acres in the 100 Year Floodplains. This may indicate that considerable importance should be placed on stormwater and drainage issues, similar to the practices and approaches that were developed for the construction of Interstate 99.

CCMPO-5

b. The recommended alternatives may include higher impacts to PA Natural Heritage Core Habitat and the Stone Mountain Important Bird Area.

CCMPO-6

c. Likewise, the recommended alternatives may include higher impacts to Socioeconomic Resources, including Residential Units, Commercial Operations, Neighborhoods, and developable area within the Regional Growth Boundary. As a part of the evaluation of impacts to Residential Units, source water protection for private wells should continue to be an area of focus.

CCMPO-7

d. The need for a connection between the Build Alternative and PA 45 should be thoroughly considered during the development of the Build Alternative, providing a better understanding of the safety, congestion and mobility impacts of the connection, and the potential impact of the connection on environmental, socioeconomic and cultural resources. CCMPO commends and supports the project team’s approach of exploring local preferences and concerns, using those to inform the analysis and design, and working towards an informed, collaborative decision.

CCMPO-8

We concur that the alternatives developed currently constitute corridors, and that considerable opportunities exist for collaborative efforts to avoid, minimize or mitigate potential impacts. We support the project team’s approach of early and ongoing coordination to identify these opportunities.

5. Supporting documents for the PEL note that US 322 carries a higher percentage of truck traffic compared to similar roadways, and that the truck volume is anticipated to grow at a higher rate than passenger vehicle volume along the US 322 corridor. Particular consideration should be given

CCMPO-9

to the need for truck facilities along the corridor, including parking, fueling and charging infrastructure and services required. These needs should be included as the treatment of interchanges and ramp connections is refined, in collaboration with local officials.

CCMPO-9

6. The PEL has included a robust and innovative plan for public outreach, leveraging technology and implementing new measure to address the restrictions related to COVID-19. To inform and improve future efforts, the following comments are offered:

a. Were participation levels in terms of attendees, comments received, and website hits consistent with expectations?

CCMPO-10

b. Were public transit agencies such as CATA and Centre County Office of Transportation specifically and individually invited included in outreach efforts? If so, should it be stated? If not, were there particular reasons or experiences guiding this approach?

CCMPO-11

c. The public officials’ meetings description notes a significant increase in the number of officials invited to the second and third meetings as opposed to the first meeting. What was the lesson learned or new approach that led to the increase? Was there a difference in comments or participation as a result of the change? Is it simpler to list the officials invited?

CCMPO-12

d. Turnover of local officials is an established and continuing problem with involvement efforts, are there lessons from this approach in addressing that issue?

CCMPO-13

7. The PEL and Alternative Analysis and Screening Report describe a Public Transportation Alternative. To what extent were CATA and the Centre County Office of Transportation involved in the development and screening of that alternative? Are there conclusions from the consideration of these alternatives that can support their efforts at service planning for the region?

CCMPO-14

8. The CCMPO appreciates the enumeration of issues identified through the PEL process that are not considered part of the SCAC project. While we acknowledge the fiscal issues that confront the CCMPO in programming projects to address the issues identified, the information provided serves to advance the project development process and the future consideration of those needs in LRTP and TIP updates. We note the following concerns with the approach:

a. The listing of roadway intersections notes several locations along PA 45 as not meeting design criteria or standards for vertical alignment, sight distance, and other design aspects. The PA 45 Corridor is noted as the subject of continuing safety concerns related to speed and travel patterns.

b. The “S-Curve” along US 322 (Mount Nittany Expressway) was identified as a continuing safety concern by the public at outreach events, with accompanying concerns about the impacts of an increase in traffic through the section resulting from the construction of the proposed project.

CCMPO-15

While the CCMPO supports solutions such as a safety study along the PA 45 corridor, we note that the configuration of a refined alternative, with or without the inclusion of a connector between the mainline and PA 45, may have significant impacts along both the PA 45 corridor and the US 322 corridor. In the event that significant impacts are identified, we look forward to working with the project team on measures to address them contemporaneous with the construction of the refined alternative.

Further, we note that the project development process is arduous and lengthy, and we note that the public may be well served by opportunities to advance construction of accompanying projects, especially those that address known deficiencies.

CCMPO-15

9. The CCMPO concurs with and supports the approach of incorporating multi-modal projects as part of the Build Alternative, and supports the ongoing collaborative approach that the project team is applying to development and consideration of these aspects of the Build Alternative or accompanying projects. We note the following concerns with the included description:

a. The listing of Multi-modal improvement projects seems brief and focused on hardscape improvements. Given the history of and difficulties encountered during previous attempts to implement multi-modal projects within the region, it may be helpful to identify the specific steps that would be taken to identify need, purpose, scope and location of multi-modal improvements.

CCMPO-16

b. The Transportation Control Measures Alternative and Transportation Systems Management Alternative descriptions included several elements that were not included in the multi-modal improvement projects listing in chapter 8 such as support for Ridesharing Services/Vanpool Programs, road weather management, traffic signal coordination, Intelligent Transportation Systems and Integrated Corridor Management. Even though these elements are not capable of meeting the purpose and needs on their own, they warrant consideration as part of the development of the Build Alternative. Barring that, they should be identified as potential needs for other regional planning processes and funding streams.

CCMPO-17

The members and staff of the CCMPO look forward to collaborating with the project team as the SCAC continues through the transportation project development process.

Sincerely,



James R. Saylor, P.E., PTOE  
Principal Transportation Planner

cc: CCMPO Technical Committee  
CCMPO Coordinating Committee  
Ray Stolinas, CCPCDO Director  
Tom Zurat, PennDOT District 2-0 District Executive

**Commenter:** Centre County Metropolitan Planning Organization (Comment 2 of 2)

**Response:**

CCMPO-1: Thank you for your comment.

CCMPO-2: Thank you for your comment.

CCMPO-3: Thank you for your comment.

CCMPO-4: Thank you for your comment.

CCMPO-5: As the engineering design advances into preliminary engineering and detailed environmental investigations, conceptual stormwater management facilities will be positioned to address roadway runoff from the proposed facilities. This could include swales, stormwater ponds/basins, or other acceptable features.

CCMPO-6: As design advances, PennDOT will consider design solutions that aid in minimizing the footprint of the proposed facility, thus minimizing the overall impacts including those associated with the PA Natural Heritage Core Habitat and Stone Mountain Important Bird Areas. For unavoidable impacts, the identification of conceptual mitigation will begin during the preliminary engineering and detailed environmental phase of project development and be coordinated with the resource agencies and the public. A mitigation plan will be developed and executed as part of the National Environmental Policy Act (NEPA) decision.

CCMPO-7: As the engineering design of the alternatives advances, PennDOT will coordinate with the local officials and identify engineering solutions to minimize impacts to community as well as the natural and cultural resources in the area. Additionally, detailed field investigations will be conducted, which include the identification of private well locations, where possible. Ultimately alternative designs will be adjusted to avoid these well locations and sensitive resources. Regardless of which alternatives are ultimately identified as a preferred alternative, PennDOT will develop mitigation strategies for unavoidable impacts to resources.

CCMPO-8: PennDOT understands the concern that the community has regarding the PA 45 connector. PennDOT is committed to conducting more detailed traffic analyses to evaluate the US 322 to PA 45 connection. Under any of the Build Alternative scenarios (US 322-1OEX, US 322-1S, or US 322-5), should the traffic analyses indicate that a connector is necessary to improve mobility and aid the State College Area Connector project in meeting the defined transportation purpose and need, PennDOT will include the US 322 to PA 45 connection. PennDOT will work with Potter Township and area residents to minimize impacts to the surrounding community. Additionally, should the associated analysis show that the Build Alternative, with the connector, adversely impacts conditions on PA 45, PennDOT would incorporate necessary improvements into the project. Conversely, if the analyses determines that a US 322 to PA 45 connection is not necessary to improve mobility and aid the State College Area Connector project in meeting the defined transportation purpose and need, the connection will be removed from the project.

As the engineering design of the alternatives advances, PennDOT will coordinate with the local officials and evaluate various interchange configurations. Regardless of which alternatives are ultimately identified as a preferred alternative, PennDOT will work to minimize impacts to the

natural, cultural, and socio-economic environment and develop mitigation strategies for unavoidable impacts.

CCMPO-9: PennDOT understands the needs for trucker amenities throughout the Commonwealth and will work with local officials and planning organizations to determine what could be implemented throughout the State College Area Connector study area.

CCMPO-10: Public participation at all of the State College Area Connector public open house meetings exceeded PennDOT's expectations. PennDOT was pleased with the community response and the input provided on the study.

CCMPO-11: Direct coordination with the CATA or the Centre County Office of Transportation was not included as part of this PEL Study. These entities are represented as part of the CCMPO Technical and Coordinating Committees. Coordination with these committees is conducted generally on a bi-monthly basis.

CCMPO-12: Following the initial public outreach in 2020, MPO members recommended expanding the local officials outreach to neighboring communities that could influence traffic patterns in the PEL study area. As a result, PennDOT targeted additional communities for inclusion in future public officials outreach efforts. Based on the additional public officials' outreach, the PEL Study not only had the local community input, but received regional perspectives from these communities.

CCMPO-13: Changing local officials for projects that take several years is a concern, which PennDOT faces on many projects throughout the Commonwealth. PennDOT will be proactive in communicating with the local officials about the project and organize meetings to discuss the project following elections.

CCMPO-14: As discussed in comment response CCMPO-11, direct coordination with the transit agencies was not conducted. The team evaluated the concept of Transit to see if it was able to qualitatively meet the transportation purpose and need for the study. The analysis found that while buses could move a great number of people more efficiently than a single automobile, the movement of people is only one aspect of traffic analysis that is being considered as part of this PEL Study. Transit improvements would not address any of the freight movement through the area that is using the local roadway network and creating conflicts with local traffic movements. Thus, it was determined that a Transit Alternative would not be able to address the transportation purpose and need and was dismissed from further consideration. No service evaluations were conducted that may benefit CATA in service planning for the area.

CCMPO-15: PennDOT is aware of the concerns along the S-curve (US 322/Mt. Nittany Expressway) and is working with the township and MPO on identifying additional safety improvements for a future solution.

Under any of the Build Alternative scenarios (US 322-10EX, US 322-1S, or US 322-5), should the traffic analyses indicate that the PA 45 connector is necessary to improve mobility and aid the State College Area Connector project in meeting the defined transportation purpose and need, PennDOT will include the US 322 to PA 45 connection. PennDOT will work with Potter Township and area residents to minimize impacts to the surrounding community. Additionally, should the



associated analysis show that the Build Alternative, with the connector, adversely impacts conditions on PA 45, PennDOT would incorporate necessary improvements into the project. Conversely, if the analyses determines that a US 322 to PA 45 connection is not necessary to improve mobility and aid the State College Area Connector project in meeting the defined transportation purpose and need, the connection will be removed from the project.

CCMPO-16: The intent of Chapter 8: Other Future Independent Transportation Projects in the Draft PEL Study report is to provide a summary of areas and projects which could be advanced through future coordination with planning partners, local officials, and stakeholders. At this time, the specific location, type, and need of multi-modal improvements that could be implemented as part of the Build Alternative is unknown until design advances.

CCMPO-17: A section has been added to Chapter 8 of the Final PEL Study report regarding Transportation Control Measures (TCM) and Transportation Systems Management (TSM) alternatives.

**Commenter:** Clitherow, Mike

**From:** Mike Clitherow [REDACTED]  
**Sent:** Thursday, March 9, 2023 9:02 AM  
**To:** Ball, Dean D <deball@pa.gov>  
**Subject:** [External] Rt 322 realignment

Dean,

I think this study MUST put "farms first". Given the importance of our farms to Pennsylvania (and the country in general), "acquiring" farms or splitting farms should be totally "off the table". I am not a farmer, but a local landowner that is not affected by the pending decisions. I do however, enjoy driving by all our local farms and admire the families that have worked all their lives to preserve this essential part of our lives.

MC-1

There are 2 main arteries that access State College ... Route 80....Rt 322 and Rt 45. The least disruptive path forward (and most logical) is to designate one of these inbound and the other outbound. Yes, the roads would need to be widened, with some local "access roads" constructed and some properties may need to be acquired. These homeowners have likely considered this as an issue for some time...perhaps even when they purchased the property. I strongly suggest you intentionally remove the acquisition of agricultural property for the benefit of people who (mostly) don't even live in this area.

MC-2

MC-1

If some agricultural property must be traversed, it should be left in tact with an elevated highway constructed to traverse the land (with drainage provided to prevent road salt from seeping into the traversed property). Yes, this will be more expensive, but far less than the total long term cost of destroying our local farms.

MC-3

I strongly suggest you do everything in your power to make this needed road improvement put "local citizens interest" above any cost consideration.

MC-4

Best regards,  
Mike

## Response:

MC-1: PennDOT recognizes the importance of farmland in the study area and that the extent of the productive agricultural land, and the viability of the farm operations/businesses are not only major contributors to the local economy but also contribute to the cohesion of the rural community and the historic heritage of the study area. Given the extent of farmland in the study area, it is not possible for a major transportation improvement project to avoid all potential impacts. However, PennDOT will make every effort to minimize impacts to these resources. To fully understand the farm operations in the area and how to best minimize potential impacts, PennDOT anticipates that a Farmland Assessment Report will be prepared during the detailed studies conducted in the preliminary engineering and detailed environmental study (National Environmental Policy Act [NEPA]) phase of the project development. Preparation of the report requires extensive interviews with all potentially impacted farm operators to identify and document the nature, features, and extent of their operations, including all farm-related structures, existing access and pathways, and other resources of the farm operation. Interviews with farm operators and landowners will also identify any leased properties required for the successful operation of potentially affected farm operations. The report will also document the potential avoidance and minimization measures

considered and the assessment of potential impacts to the viability of individual operations. PennDOT cannot acquire right-of-way to productive agricultural land or Prime agricultural land unless the Agricultural Land Condemnation Approval Board (ALCAB) gives approval, or the landowner amicably agrees to the conversion to transportation use.

MC-2: As described in Chapter 1 of the Draft PEL Study report, the key roadways within the 70-square mile PEL study area include Interstate 99 (I-99), US 322, PA 26, PA 144, PA 45, PA 192, and PA 64. While these key transportation routes provide access to nearby I-80, this interstate is not located within the PEL study area.

An evaluation was completed on a “One Way Pair” Alternative corridor concept similar to the alternative suggested in the comment and can be found in Section 4.6 of the *Engineering Technical Memorandum for the State College Area Connector Planning and Environmental Linkages Study*. This alternative utilized the western portions of existing US 322 and PA 45 within the study area to carry one-way traffic eastbound and westbound respectively. This concept would provide a new four-lane, limited access facility paralleling existing US 322 from Potters Mills to just west of Tusseyville, where the two westbound lanes would diverge and traverse north to tie into PA 45, then follow PA 45 as a one-way, limited access highway to Boalsburg where it would rejoin US 322 at the Mt. Nittany Expressway. Conversely, one-way, eastbound traffic would follow existing US 322 from the end of the Mt. Nittany Expressway in Boalsburg to Tusseyville and the convergence point. Along the one-way sections of roadway, two-lane service roads would provide access to adjacent properties and local side roads.

Although the concept used the existing roadways to the extent practicable with the intent of limiting impacts, the need to maintain a limited access facility and still maintain local access via service roads, resulted in impacts, which exceeded other Build Alternatives. On PA 45 in particular, substantial widening would be required to provide shoulder widths that meet current design standards and construct the service road resulting in an increase in the number of displacements along with impacts to the natural resources adjacent to the existing roadway. In addition, there would be an increase in noise levels over existing, particularly along PA 45, and additional structure costs associated with the service roads and grade separation needed to connect and maintain access to the local road network.

MC-3: During the NEPA phase of the transportation development process, environmental field data will be collected and engineering designs advanced. Engineering designs will meet current design standards and include stormwater management facilities to treat stormwater runoff from the proposed transportation facility. Traversing agricultural property with elevated highways would be economically infeasible. The bridge structures and associated maintenance of elevated structures would cost over 10 times the roadways built on grade. In the event of an emergency, blocked lanes on an elevated structure may increase emergency response times. Future widening of elevated structures would be more difficult and costly than roadway widening. In addition, maintenance operations such as snow removal and storage on a structure are more difficult due to the limited width. An open grassed median is more efficient for snow removal and drainage.

MC-4: PennDOT continues to follow the required and appropriate methodology in the planning, preliminary design, and environmental studies that have been conducted to date. Additionally, PennDOT has shared the analysis and results of the PEL documentation with the public and the

Cooperating and Participating Agencies throughout the entire study process and will continue to do so moving forward.

Throughout the PEL Study process, PennDOT has considered all comments brought forward by the public and Cooperating and Participating Agencies. PennDOT has and will continue to utilize the input provided by the public and Cooperating and Participating Agencies to inform the analysis and design during the NEPA phase.

**Commenter:** Collins, John

**From:** John Collins [REDACTED]  
**Sent:** Sunday, February 26, 2023 7:28 PM  
**To:** Ball, Dean D <deball@pa.gov>  
**Cc:** Hoffman, Marcella <mhoffman@crcog.net>; Saylor, James <jsaylor@crcog.net>; blord@harristownship.org;  
[REDACTED] Ben LaParne [REDACTED] Jim.Hunt@dot.gov  
**Subject:** [External] Citizen Comments on PennDOT PEL Draft

Hi Dean-

Thank you for the opportunity to comment on the PEL Draft report released this month. Please find my detailed comments.

As described in detail in the attached 4 pages of comments, I believe 322-5 should ultimately be the preferred alternative because it is the only one of the recommended alternatives that does not include the Route 45 Connector.

JC-1

As PennDOT develops the Draft and Final Environmental Impact Statements and the CRCOG develops its transportation projects, I urge you to make specific commitments to improve the environmental impact of 322-5 and mitigate damage by incorporating improvements for fringe parking, ITS components, transit, bike routes, and noise mitigation and implement them concurrently, or in advance, as part of the SCAC project.

JC-2

Thank you.

John

John Collins, Esq.

[REDACTED]

Commenter: Collins, John (cont.)

[REDACTED]  
February 27, 2023

Mr. Dean D. Ball, P.E.  
Project Manager, SCAC  
PennDOT District 2  
Clearfield, PA

Ref.: SCAC Project- PennDOT Draft PEL Study (Feb. 2023)

Dear Mr. Ball:

I would like to provide the following comments and requested actions for the State College Area Connector (SCAC) Project – Planning and Environmental Linkages (PEL) Draft Study.

**Prior Comments of Petitioner**

As you know, I spoke at the Boalsburg Open House on the SCAC in October 2022 and provided written and oral comments. Thank you for accurately and fully incorporating my comments. I was pleased that your District Executive, Tom Zurat, reacted to my five suggestions for fringe parking, ITS components, transit, bike routes, and noise mitigation and entered his reactions into the formal record (Open House Report, page 184)

\*\*\*\*So the commitment \*\*\* for the multimodal side of it is-- is part of the process and we definitely look at that. I like the idea. I guess we're just getting into the EV side of things, so, you know, that's a good thought." (emphasis added)

In the PEL Draft Study (page 88), you wrote the following:

Multi-modal improvements could be included as part of the Build Alternative, where appropriate, or programmed as new projects or upgraded facilities to improve multi modal connectivity throughout the study area. Specific improvements could include park-n-ride lots with electric vehicle charging stations, dedicated bikeways or bike lanes,\*\*\*

JC-2

As you proceed with the planning, programming, design, construction, and implementation of the SCAC, I urge you to take the opportunity to incorporate these five elements into the SCAC Build Alternative and not leave them to follow-on studies or future projects. As described in more detail below, these five elements would be a small part of the cost of the project (likely less than 10%), would add to the safety and effectiveness of the SCAC, decrease the environmental impact, give the community something back for the disruption during construction, and reduce the likelihood of expensive and time-consuming litigation. Promises of future programming of projects after the SCAC is complete are well-intentioned, but have no physical impact.

## **Interest and Qualifications of Petitioner**

I have lived in the SCAC project area since 2004 and travel the roads (322, 45, and 144) on a daily basis. The town of Centre Hall is very small with few services, so we travel on Routes 45 and 322 to State College for most of our needs. My wife teaches at Penn State and we are season ticket holders for several sports. We have been the beneficiaries of the improvements PennDOT has already made to 322 (the Lewisburg narrows, the Boalsburg north link, and recently the Potters Mills overpass.) We see the safety issues with the remaining non-limited access roads on a daily basis and fully support PennDOT's plans to upgrade the remaining gap (SCAC) to a limited access facility.

I am a retired engineer and lawyer. I worked for USEPA reviewing NEPA statements and for USDOT reviewing and approving transit and highway projects. I began my transportation career working for the Philadelphia MPO. I was General Counsel and head of policy for the American Trucking Associations, President of ITS America and on the Board of ITS PA, and a contractor and program manager for PennDOT and the PA Turnpike on ITS projects in Districts 6 and 11 and on the Turnpike. I have testified as an expert witness in highway litigation in Baltimore. I have extensive, relevant experience and advice that can benefit PennDOT as you move forward with the SCAC.

If you have any questions, you can reach me at [REDACTED] or at [REDACTED]

## **Petitioner's Preferred Alternative**

Based on my professional and personal experience, I think PennDOT has made the correct choice in focusing on the three Boalsburg Alternatives as the Recommended Environmental Corridors (Draft PEL Study, Table 6-4): 322-10EX, 322-1S, and 322-5. I believe the no build and 144 alternatives will not meet future transportation needs.

Of these three, I believe 322-5 should become the preferred alternative, because it is the only one of the recommended alternatives that does not include the Route 45 Connector. The Route 45 Connector would not do a good job of serving Route 45 traffic. Traffic coming from/going to Centre Hall 6 miles to the east and connecting to 322 south would be more likely to use 144 south to the 322 Potter Mills full interchange to avoid going six miles out of their way. Traffic using the new connector to get 1 mile west to/from Boalsburg would have to drive over a hilly, 2 lane Route 45 with poor sight distances and 21 unprotected driveways and 19 intersections protected by single stop signs. Three of these intersections are highlighted by PennDOT in the DRAFT PEL Study as not meeting safety and design standards (PA 45 at Willowbrook Drive/Rockey Ridge Road, PA 45 at SR 2006 (Linden Hall Road), and PA 45 at SR 2004 (Cedar Run Road). The new connector is opposed by residents where the connector would be built who don't want the land acquisition, safety, noise and air pollution impact of the new road.

JC-1

Although it is not clear from the diagrams in the PEL Draft, full Route 45 interchange movements should be accommodated by building slip ramps on the south side of the current interchange from Route 45 to the new 322 SB and from the new 322 NB to Route 45. This

concentrates the environmental impact in the current location and the current traffic signal can be incorporated into the new movements.

As PennDOT develops the Draft and Final Environmental Impact Statements, I urge you make specific commitments to improve the environmental impact of 322-5 and mitigate damage by incorporating the following elements into 322-5 as the Preferred Alternative and implement them concurrently, or in advance as part of the SCAC project.

JC-1

## **ELEMENT #1. Fringe Parking Lot**

**Discussion:** A fringe parking lot in the project area with direct access to/from the new SCAC would be a valuable transportation improvement that would give something back to the neighbors who will bear the brunt of the facility. Ideally, the land would be acquired as part of Uniform Relocation Act requirements that discourage landlocked parcels so it would not require an additional taking. Hopefully, the lots can be opened even before construction of the SCAC is completed, so it can benefit travelers during construction congestion.

JC-3

**RECOMMENDATION:** The fringe parking lot should incorporate new USDOT/USDOE policies to foster electric vehicle (EV) charging stations and have solar panels that also provide shelter. PennDOT should work with CATA to extend existing bus service to the lot and provide secure bicycle facilities for alternative modes of transportation.

## **ELEMENT #2: Intelligent Transportation System (ITS) Features**

**Discussion:** Please incorporate ITS features in the planning and subsequent phases of the SCAC. Often ITS features are done as add-ons which can lead to poorer location choices and higher costs. The sections of 322 north of Boalsburg have cameras, VMS signs, and curve speed installations. They should be integrated into a 322 regional system.

**RECOMMENDATION:** For example, there should be an ITS installation south of Boalsburg advising motorists of traffic congestion ahead with real time information and advice on alternative routes (for example, Business 322 versus limited access 322.) There should be real time information on variable message signs (VMS) telling travelers on the SCAC about the fringe parking lot described in Element #1 including: number of parking spots available, number of EV stations available, and time of next CATA bus. The ITS system should also provide real time camera coverage in the lot for security.

JC-4

## **ELEMENT #3: Transit improvements**

**DISCUSSION:** CATA, the area transit provider, currently has service in Boalsburg and in Pleasant Gap, but no service in Centre Hall or on Route 45. This project offers an opportunity to expand service both as a demonstration project during construction and as a permanent commitment.

JC-5

**RECOMMENDATION:** Please include transit opportunities in the project planning and implementation and make concrete transit commitments in the draft and final EISs.



**ELEMENT #4:** Bicycle improvements

**DISCUSSION:** The public hearing materials for the October Public Hearing included a discussion of the bicycle routes in the project area and safety problems with existing resources. In the area, there is a lack of separate lanes and wide paved shoulders and a lack of connectivity to existing bike routes.

JC-6

**RECOMMENDATION:** Please include bicycle improvement opportunities, such as along Brush Valley Road, Route 322 and at the fringe parking lot, in the project planning and implementation and make concrete commitments in the draft and final EISs to fund the improvements as part of the SCAC project.

**ELEMENT #5:** Noise levels and mitigation

**DISCUSSION:** The PEL Draft Study does not have detailed discussion of noise levels from alternatives. While many noise issues can only be discussed at the design level, your alternatives present different noise impacts and some that can only be mitigated by choosing alternative routing.

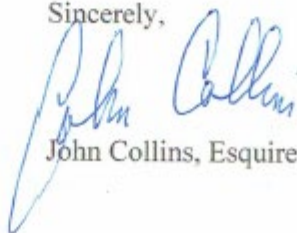
Generally, if you can see the noise generator, you hear it. Noise levels should be mitigated by depressing roadways so the noise is not impacting sensitive receptors. Where roadways cannot be depressed, there should be noise barriers that absorb/reflect sound. Active noise mitigation (white noise generators) should be considered.

JC-7

**RECOMMENDATION:** Include a discussion of local noise impacts and mitigation in the project planning and implementation and make concrete commitments to reduce noise impact in the draft and final EISs during construction of the SCAC. Select 322-5 as the Preferred Alternative as the best way to avoid noise impact in the proposed Route 45 Connector area.

Thank you for the opportunity to comment. Please include me on the future distribution of SCAC materials.

Sincerely,



John Collins, Esquire

**Commenter:** Collins, John

**Response:**

JC-1: PennDOT understands the concerns that the community has regarding the PA 45 connector. PennDOT is committed to conducting more detailed traffic analyses to evaluate the US 322 to PA 45 connection. Under any of the Build Alternative scenarios (US 322-1OEX, US 322-1S, or US 322-5), should the traffic analyses indicate that a connector is necessary to improve mobility and aid the State College Area Connector project in meeting the defined transportation purpose and need, PennDOT will include the US 322 to PA 45 connection. PennDOT will work with Potter Township and area residents to minimize impacts to the surrounding community. Additionally, should the associated analysis show that the Build Alternative, with the connector, adversely impacts conditions on PA 45, PennDOT would incorporate necessary improvements into the project. Conversely, if the analyses determines that a US 322 to PA 45 connection is not necessary to improve mobility and aid the State College Area Connector project in meeting the defined transportation purpose and need, the connection will be removed from the project.

As the engineering design of the alternatives advances, PennDOT will coordinate with the local officials and evaluate various interchange configurations. Regardless of which alternatives are ultimately identified as a preferred alternative, PennDOT will work to minimize impacts the natural, cultural, and socio-economic environment and develop mitigation strategies for unavoidable impacts.

JC-2: Thank you for your comment. Please see the responses below regarding fringe parking, park-and-ride facilities, ITS components, transit, bike routes, and noise mitigation.

JC-3: During the preliminary engineering and detailed environmental studies (National Environmental Policy Act [NEPA]) phase, support facilities to the Build Alternative would be considered including fringe parking and/or park-and-ride facilities with electric charging stations. Additionally, PennDOT identified other localized independent transportation projects that could benefit the study area. These projects could include improvements to roadway intersections and segments, as well as improvements in bikeway connectivity, CATA transit routes and other modes of travel, which could be advanced as separate transportation projects with independent funding mechanisms. If any of the independent projects are identified for further development, PennDOT would work with the CCMPO to plan and program these new projects accordingly. The Draft PEL Study report identifies several roadway intersections and segments to evaluate the need for independent transportation projects.

JC-4: Incorporation of Intelligent Transportation System (ITS) features will be considered during the NEPA phase for the Build Alternatives, as appropriate.

JC-5: PennDOT does not have authority to identify fixed transit routes for the Centre County region. As the design advances, PennDOT may coordinate with CATA to determine how transit facilities should be accounted for in the project (e.g., park-and-ride facilities, etc.). Additionally, your request for expanded services will be provided to CATA.

JC-6: Incorporation of bike facilities will be considered during the NEPA phase for the Build Alternatives, as appropriate.

JC-7: As the engineers work to identify a roadway alignment and profile, they will evaluate depressing the roadway which aids in visually screening as well as noise buffering the roadway. Ultimately, the team works to establish a roadway profile that optimizes earthwork and balances resource impacts.

Additionally, noise will be evaluated as part of the NEPA phase of the project development process. During this phase, PennDOT will conduct a Preliminary Design Highway Traffic Noise Assessment for the proposed alternatives. State and Federal Guidelines require PennDOT to use a standardized process to identify locations where abatement is potentially warranted, feasible, and reasonable considering peak hour noise levels and the potential effectiveness of noise abatement measures. This process includes the following steps:

1. Identify land uses within the project area that are sensitive to noise, such as homes and parks.
2. Monitor existing noise levels and develop acoustical models to predict future conditions.
3. Evaluate predicted future noise levels after the highway project is constructed and identify locations where noise impacts are anticipated.
4. Consider noise abatement where noise impacts are anticipated.
5. Identify areas where preliminary noise abatement is potentially warranted, feasible, and reasonable.

The Noise Assessment will be reevaluated in the Final Design process before final determinations regarding potential noise abatement designs are made for the project.

**Commenter:** Dean, Ethan

**From:** Dean, Ethan [REDACTED]  
**Sent:** Thursday, March 16, 2023 2:15 PM  
**To:** Murnyack, Eric J <emurnyack@pa.gov>  
**Subject:** [External] State College Connector Complaint

I sent this email originally to the email listed on the site ([deball@pa.gov](mailto:deball@pa.gov)) but they are out of the office until after the window for comment closes and I wanted to make sure this message was heard. This email is where I was told to send information.

Hello,

My name is Ethan Dean and I am a student at Penn State and a resident of State College. I am heavily against the new proposed road project.

I can see why at first glance this project would assume to be a good idea. However, it has been shown for decades that more roads doesn't decrease traffic and instead increases traffic and cost. This is seen in a recent NYT article here <https://www.nytimes.com/2023/01/06/us/widen-highways-traffic.html> and an article not behind a paywall here: <https://archive.curbed.com/2020/3/6/21166655/highway-traffic-congestion-induced-demand>. Increased costs and high traffic are not what people, of all locations and political affiliations want.

ED-1

Secondly, road infrastructure perpetuated an unfair system of people who have money. Ever since the car industry has lobbied to increase car spending and reduce rail and transit options, the state and government have subsidized this infrastructure. This hurts the people as it is more expensive and lowers their transit options. Not only does it make you need to have a car to engage in the community, but it makes the borough of state college need to build lots of parking to maintain the outside travel instead of having them use transit to come in. This is real and was a problem talked about at our transportation commission meetings and with local government officials I have talked with in-state college.

ED-2

Third, ill destroy local areas surrounding the road. In all the proposed routes, there is a detriment to our community. The project was either built through farms or natural forested areas or both. We need to ask ourselves if this is sustainable. Not only for cost, traffic, and infrastructure as mentioned above but environmentally and for local farmers. I truly think this isn't worth it, especially for 13 miles of road that will not reduce traffic in the long term and will incur additional costs.

ED-3

Lastly, this project is a staggering cost. 500 million dollars is too much to spend on 13 miles of road. There are many other traffic calming measures that could reduce traffic. For example, I looked here: <https://www.wanderu.com/en-us/bus/us-pa/state-college/us-pa/harrisburg/> and a bus ticket round trip would be 50 dollars round trip, meaning instead this project could pay for 10 million bus tickets round trip for people from Harrisburg for example. This or another project increasing transit is a much more cost and accessibility-centered option that would help the community. This is what we want, more spending on helping the community, not increasing the size of the roads and the cost of maintaining them while hurting local farmers and local forests.

ED-4

I really hope that you will consider the changes that the community has mentioned in your plan. Thank you very much for giving us an opportunity to give our input on this project.

Thank you,

-Ethan Dean

**Commenter:** Dean, Ethan

**Response:**

ED-1: According to research published by the Transportation Research Board (TRB) and the Journal of Transport and Land Use, "latent demand" and "induced demand" are two concepts in transportation planning that describe different aspects of travel behavior and its relationship with infrastructure and services.

Latent demand refers to the existing or potential travel demand currently unmet or underserved due to various reasons such as lack of infrastructure, limited services, or other constraints. Induced demand refers to the phenomenon where the expansion or improvement of transportation infrastructure or services leads to an increase in travel demand beyond what was initially anticipated. This increase in demand is often attributed to factors such as reduced travel time, improved accessibility, or enhanced convenience resulting from the new infrastructure or services.

The phenomenon of latent/induced demand occurs with transportation improvement projects when a bottleneck is removed, capacity/throughput is increased and a faster route results in a shifting of traffic to the faster route.

These dynamics are taken into account as part of the travel demand/traffic forecasting process with the use of the Centre County Regional Travel Demand Model (CCRTDM). Future traffic volumes generated by a travel demand model are based on the existing roadway network with future planned/programmed transportation improvements as well as existing development and anticipated future development, through coordination with the county and local municipalities (cities, boroughs, and townships) within the surrounding region. Thus, the use of a travel demand model in the traffic forecasting process helps designers better predict the change in travel patterns/volumes that are anticipated to occur with a regional transportation improvement project such as the State College Area Connector. The goal of the State College Area Connector project is to shift modeled traffic volumes from the local roadway network to the Build Alternative to improve safety and provide an efficient way for traffic to move through the area rather than have traffic impact the local roadway network (No Build Alternative).

ED-2: The team evaluated the concept of Transit to see if it was able to qualitatively meet the transportation purpose and need for the study. The analysis found that while buses/trains could move a great number of people more efficiently than a single automobile, the movement of people is only one aspect of traffic analysis that is being considered as part of this PEL Study. Transit improvements would not efficiently address any of the regional passenger or freight movement through the area that is using the local roadway network and creating conflicts with local traffic movements. Thus, it was determined that a Transit Alternative alone would not be able to address the transportation purpose and need and was dismissed from further consideration.

The National Environmental Policy Act (NEPA) phase of project will include an environmental justice analysis and any alternative will comply with the provisions of Executive Orders 12898 and 14096.

ED-3: As part of the preliminary engineering and environmental studies (National Environmental Policy Act [NEPA]) phase of the project, detailed studies to identify natural, cultural and social resources will be conducted. Potential impacts to natural resources (including wetlands, streams, forestlands, agricultural, and threatened and endangered species) will be considered and the preliminary engineering of the Build Alternatives corridor locations refined, in an effort to avoid and minimize impacts to these valuable and protected resources to the extent practicable.

ED-4: PennDOT utilizes various traffic calming measures throughout the Commonwealth. These types of measures were considered under the Transportation Systems Management (TSM) Alternative for this study. Through the screening process, it was determined that TSM solutions alone would not meet the identified transportation purpose and need of the PEL Study. Please see response ED-2 regarding Transit.

**Commenter:** Derstein, Mary

**From:** Derstein, Mary G [REDACTED]  
**Sent:** Thursday, February 23, 2023 4:05 PM  
**To:** Ball, Dean D <deball@pa.gov>  
**Subject:** [External] Noise pollution

I live at [REDACTED] Boalsburg, PA.

This area is not included in "the study," but I would like the residents in "the hill district" to be considered in the plan. I moved here 8 years ago to share housing with a friend who bought the house in 1990. Over the past eight years, truck traffic has increased significantly. I sleep in the finished basement due to the heavy truck noise during the overnight hours. It might be fair to say that Route 322 is becoming the mid-state 'turnpike.' To reduce some of the noise, I'm suggesting that the grade of the road from Route 45 to College Avenue be adjusted to eliminate the need for down/up shifting and reduce the angle of the "S" curve approaching College Avenue.

MD-1

MD-2

Thank you for your time and consideration,  
Mary G. Derstein

[REDACTED]  
Boalsburg, PA  
[REDACTED]

**Response:**

MD-1: During preliminary engineering and detailed environmental studies, local connections and alterations to the existing roadway network will be evaluated. Should those evaluations determine that changes are needed at the tie-in with existing US 322/Mt. Nittany Expressway, noise analysis would be completed as part of this project.

MD-2: PennDOT is aware of the concerns along the S-curve (US 322/Mt. Nittany Expressway) and is working with the township and MPO on identifying additional safety improvements for a future solution.

**Commenter:** Dieken, RJ "Deke"

**From:** Dieken, Deke [REDACTED]  
**Sent:** Monday, March 20, 2023 12:00 AM  
**To:** Ball, Dean D <deball@pa.gov>  
**Subject:** [External] 322 Connector Project Comment

Mr. Ball,

I am writing after talking to several farming families who will be impacted by the proposed 322 connector project. As a former truck driver and a 3rd-year law student at Penn State. I take great interest in this project. I have seen the three proposed routes, and the two routes with easy connections to PA-45 make the most sense. I understand the realities of decreasing revenue from fuel taxes, and I understand the safety issues on 322 that need to be addressed. Even the farming families with land that will be taken are willing to admit that safety needs to be improved on the 322 corridor. Ethically I would like to hear PennDOT consider roadway features such as small tunnels and or bridges in places that will minimize the effect of you seizing a strip of land that divides farming ground. Please consider the effects of using eminent domain to seize a strip of land through the middle of single-owner parcels of land. Talk to the farmers and listen to them when they tell you how orphaning land from the farmhouse and the farm equipment stored there.

RD-1

All I see in the works are the PATHS of the roads. I didn't see much assessment of the ways that PennDOT can minimize the impact on farming families, and I don't see a lot of consideration of alternative road features. Please, don't just bulldoze a road, and call it done. Do more, become more involved with the community that this road will effect. Public meetings may not be the best way to get this done, perhaps you could reach out to the individual landowners for some kind of mediation process. I know public meetings are pretty tough to handle, but perhaps you can talk to the people who SHOULD matter to you in a private and rational setting. Penn State Law students, especially those of us in mediation class would love the opportunity to help make your conversations more productive. Please reach out if we can be of any assistance.

RD-2

Otherwise,

If you can take the cheaper option and move some of the money saved into mini bridges or tunnels to allow farming equipment underneath the road—please do so.

There are many plants that make concrete square tunnels that can be installed underneath a road. They are very common out west, where I am from, and we have no problems bringing even the most extreme oversize and overweight loads over them. I know this because I drove Super-Load oversize for 8 years. The precast tunnels that you can drive farm equipment through do not require a large amount of planning. And as previously mentioned their limited size makes the structural engineering considerations minimal.

RD-1

However, if you cannot minimize the effect of the road on some farmers, Pennsylvania should, as many other states do, consider the lost enterprise value of not just the land seized, but the land that is made unable to produce crops. eg. fallow land. If a farmer tells you, and you believe, that land that farmer owns will become fallow after the 322 project is completed. Please either consider the value of that land in the monetary value paid for it or seize all the to be fallow land and pay fair value for it.

RD-3

Best,  
RJ "Deke" Dieken



**Commenter:** Dieken, RJ “Deke”

**Response:**

RD-1: During preliminary engineering and detailed environmental study, the team will conduct detailed field investigations including interviews with farm operators to understand how the operation functions, access patterns, and needs. Following these investigations, shifts in the alternatives and/or the need to provide culverts and underpasses (e.g., tunnels) for farm access will be addressed accordingly.

RD-2: PennDOT recognizes the importance of farmland in the study area and that the extent of the productive agricultural land, and the viability of the farm operations/businesses are not only major contributors to the local economy but also contribute to the cohesion of the rural community and the historic heritage of the study area. Given the extent of farmland in the study area, it is not possible for a major transportation improvement project to avoid all potential impacts. However, PennDOT will make every effort to minimize impacts to these resources. To fully understand the farm operations in the area and how to best minimize potential impacts, PennDOT anticipates that a Farmland Assessment Report will be prepared during the detailed studies conducted in the preliminary engineering and detailed environmental studies (NEPA) phase of the project development. Preparation of the report requires extensive interviews with all potentially impacted farm operators to identify and document the nature, features, and extent of their operations, including all farm-related structures, existing access and pathways, and other resources of the farm operation. Interviews with farm operators and landowners will also identify any leased properties required for the successful operation of potentially affected farm operations. The report will also document the potential avoidance and minimization measures considered and the assessment of potential impacts to the viability of individual operations. PennDOT cannot acquire right-of-way to productive agricultural land or Prime agricultural land unless the Agricultural Land Condemnation Approval Board (ALCAB) gives approval, or the landowner amicably agrees to the conversion to transportation use.

Additionally, as part of the NEPA phase of the project, detailed studies to identify natural, cultural and social resources will be conducted. Potential impacts to natural resources (including wetlands, streams, forestlands, and threatened and endangered species) will be considered and the preliminary engineering of the Build Alternatives corridor locations refined, in an effort to avoid and minimize impacts to these valuable and protected resources to the extent practicable.

RD-3: A PDF of PennDOT’s *Publication 83, When Your Land is Needed for Transportation Purposes (Some Questions and Answers on the PennDOT Acquisition Process)* is available on the project website. Additionally, staff from PennDOT’s right-of-way unit have been present at all public meetings to answer individual property owner questions and will continue to be present at all future public meetings. During the right-of-way process, these types of decisions will be made on an individual basis.

**Commenter:** Environmental Protection Agency (EPA)

---

**From:** Davis, Jamie <Davis.Jamie@epa.gov>  
**Sent:** Thursday, March 16, 2023 2:41 PM  
**To:** Ball, Dean D <deball@pa.gov>  
**Cc:** Witman, Timothy <witman.timothy@epa.gov>  
**Subject:** [External] EPA comments on the SCAC PEL study

**ATTENTION:** This email message is from an external sender. Do not open links or attachments from unknown senders. To report suspicious email, use the [Report Phishing button in Outlook](#).

Hello Mr. Ball,

Thank you for the opportunity to review the State College Area Connector Planning and Environmental Linkage (PEL) Study conducted by the Pennsylvania Department of Transportation (PennDOT), in cooperation with the Federal Highway Administration (FHWA) and the Centre County Metropolitan Planning Organization (CCMPO). The PEL Study is a collaborative and integrated study approach to transportation planning that considers the environment, community, and local and regional economic goals in the planning phase of transportation decision making. The results of the study identified three transportation alternative corridors and refined the study area to be advanced to National Environmental Policy Act (NEPA) process.

The Environmental Protection Agency (EPA) is a cooperating agency on this project, and we appreciated the opportunity to provide pre-NEPA feedback on the technical memos and supporting documentation. We look forward to reviewing the information that will be gathered on the alternatives that are developed in the NEPA process and will provide specific comments as those reports are made available.

The website for this project is very informative. We are especially supportive of the Environmental Web Map. The ease of use and information provided on the Environmental Web Map will be a valuable resource for the public to utilize to better understand the project and its potential impacts.

As the project moves into the NEPA stage of development EPA provides the following comments for your consideration:

**Alternatives - Non-build modes of transportation**

The Transportation Control Measures (TCM) Alternative, The Transportation Systems Management (TSM) Alternative and The Public Transportation Alternative were not carried forward in the PEL study for failure to meet the purpose and

1

EPA-1

need. Information provided indicated these alternatives could be incorporated into future local transportation projects. EPA encourages FHWA to continue to consider these non-build alternatives in the NEPA process and determine if utilizing non-build strategies independently, or in conjunction with build alternatives, can lessen the traffic burden on the transportation system and reduce impacts to the surrounding communities.

EPA-1

#### **Air Quality**

Air Quality was not addressed in the PEL study or the supporting technical memos. EPA recommends the NEPA document discuss air quality impacts from project construction, maintenance, and operations with respect to criteria air pollutants and air toxics, including diesel particulate matter emissions. Also discuss the direct, indirect, and cumulative impacts of project related air emissions. Disclose current representative background criteria air pollutant concentrations in the project areas, compare to the state and federal ambient air quality standards, and disclose any other air quality regulations and requirements related to the project.

For air pollutant emissions expected during construction, discuss the potential exposure of these pollutants to nearby sensitive populations, such as residences including communities with environmental justice concerns, park/recreational users, schools, daycares, seniors/nursing homes, hospitals, and other healthcare facilities. EPA recommends including a discussion of measures to be taken to minimize air quality impacts on the local environment and decrease exposure of construction-related emissions to neighboring sensitive populations. For example, locate construction equipment and staging zones away from sensitive receptors and fresh air intakes to buildings and air conditioners.

EPA-2

#### **Greenhouse Gas Emissions and Climate Change**

On January 9, 2023, Council on Environmental Quality (CEQ) published interim guidance to assist federal agencies in assessing and disclosing climate change impacts during environmental reviews. See <https://www.federalregister.gov/documents/2023/01/09/2023-00158/national-environmental-policy-act-guidance-on-consideration-of-greenhouse-gas-emissions-and-climate> CEQ developed this guidance in response to EO 13990, Protecting Public Health and the Environment and Restoring Science to Tackle the Climate Crisis. This interim guidance is effective immediately. CEQ indicated that agencies should use this interim guidance to inform the NEPA review for all new proposed actions and may use it for evaluations in process, as agencies deem appropriate, such as informing the consideration of alternatives or helping address comments raised through the public comment process. EPA recommends the future State College Area Connector NEPA document apply the interim guidance as appropriate, to ensure robust consideration of potential climate impacts, mitigation, and adaptation issues.

#### **Community Engagement**

The project team has made a concerted effort to engage the public throughout the PEL Study. We encourage the continued outreach to the community, including Plain Sect community that may not receive notification through traditional media. EPA encourages the project team to engage the local agricultural community in meaningful discussion to ensure potential impacts and project details are understood and that the concerns of the agricultural community are heard.

EPA-3

Thank you for the opportunity to review the State College Area Connector PEL Study. We look forward to continuing to serve as a cooperating agency as this project moves into the NEPA stage. If you have any questions, please feel free to contact me at [davis.jamie@epa.gov](mailto:davis.jamie@epa.gov).

Sincerely,  
Jamie Davis

Jamie Davis  
Office of Communities, Tribes & Environmental Assessment  
National Environmental Policy Act (NEPA)  
U.S. EPA Region III

**Commenter:** EPA

**Response:**

EPA-1: The PEL Study evaluated the Transportation Control Measures (TCM), Transportation Systems Management (TSM), and Transit Alternatives. The screening methodology developed for the alternatives considered how each of the alternatives would independently address the defined PEL Study purpose and need. As outlined in Chapter 6 of the Draft PEL Study report, the TCM, TSM, and Transit Alternatives were determined to not provide sufficient means to independently address the stated purpose and need and were therefore dismissed from further consideration in this PEL Study. However, the Draft PEL Study report does state that components of these alternatives may be further considered to enhance the alternative advanced for future study or could be independently advanced to address a more localized transportation need. This would be determined as the State College Area Connector advances into detailed engineering and environmental study. Additionally, a section has been added to Chapter 8 of the Final PEL Study report regarding TCM and TSM alternatives as independent projects.

EPA-2: Air quality will be evaluated as part of the NEPA analysis, as appropriate.

GHG/Climate Change is a complex issue that is related to regional factors. Project level details are evaluated to ensure they are consistent with regional conformity objectives; however, there is no real mechanism to assess GHG/Climate Change with a meaningful level of detail for individual alternatives of a specific project at the planning level. For transportation projects, congestion is one of the main considerations for potential air quality issues. Since reducing congestion was part of the stated purpose and need of this project, all of the alternatives that were advanced through the Level 2 Screening, which include both the US 322 and PA 144 Build Alternatives, would be considered as sufficiently meeting the regional conformity objectives.

A qualitative evaluation of air quality (which includes GHG and Climate Change) will be completed for the State College Area Connector project as part of the NEPA analysis. Both the PA Climate Action Plan and Centre Region Climate Action Plan have been reviewed and will be considered as environmental studies progress. PennDOT will also work with FHWA and other agencies to apply interim guidance, as applicable for the State College Area Connector project.

The strategies and objectives to reduce GHG emissions of both the state and local Climate Action Plans will be taken into consideration and incorporated into the air quality and climate change analysis for the State College Area Connector project as more detailed data becomes available during the NEPA process. These considerations will be consistent with current regulations and requirements, using the most current available tools and methodologies.

EPA-3: PennDOT intends to continue the public and agency outreach plan throughout the NEPA phase of the State College Area Connector project.

**Commenter:** Foreman, Ellen

**From:** Ellen Foreman [REDACTED]  
**Sent:** Saturday, March 18, 2023 11:14 AM  
**To:** Ball, Dean D <deball@pa.gov>  
**Subject:** [External] Comments Rt 322 and Rt 45 expansions

I have provided comments along the way, urging Penn DOT to reconsider any expansion to the foot print of the existing road without first trying to use traffic calming measures and innovative approaches to traffic routing that would decrease what you have identified as a safety threat. I did provide many examples and I'm sure others have for ways of doing this. However, that has been ignored so I will restate my objections:

EF-1

1) Before moving forward, enforce the existing laws meant to increase safety--speed, vehicle distance, etc.

EF-2

2) Provide alternate methods of transporting students/families/fans to Penn State

EF-3

3) Fix the current problems on Rt 322 using measures to slow down traffic like weight restrictions, traffic signals, etc.; use dedicated right side passing lanes, turning lanes, overpasses and underpasses for movement of farm equipment, wildlife corridors, cyclists, and pedestrians

EF-1

4) Preserving our agricultural and forested lands are critical to capturing carbon emissions and helping to mitigate the ravages of our fossil fuel driven economy.

EF-4

5) No expansion will also continue to maintain the way of life that attracts so many to Central PA

EF-5

6) There are protected species that would be impacted by building out these roads as scoped. Destroying habitats as well as precious farmlands must not be part of any expansion plan.

EF-4

I travel route 322 quite often going to Harrisburg, Washington and Baltimore. In my 13 years I have only encountered issues one time because I use map routing software that identifies traffic issues. This seems to me to be a problem invented by people trying to encourage more not less traffic. Expanding the road will simply add more vehicles, especially trucks, and pollution to our area which is already under threat from the climate crisis.

EF-6

EF-7

Ellen Foreman  
[REDACTED]  
[REDACTED]  
[REDACTED]

## Response:

EF-1: PennDOT utilizes various traffic calming measures throughout the Commonwealth. These types of measures were considered under the Transportation Systems Management (TSM) Alternative for this study. Through the screening process, it was determined that TSM solutions alone would not meet the identified transportation purpose and need of the PEL Study.

EF-2: While speed enforcement is always a concern when considering the safety of the traveling public, it is not under PennDOT purview and specific concern areas should be addressed with state and local law enforcement. Additionally, increased law enforcement on the roadway alone will not meet the identified purpose and need of the PEL Study.

EF-3: Traffic engineers divide traffic congestion into recurring congestion and non-recurring congestion according to its cause. "Rush hour" daily commuting is the leading reason of recurring congestion. Non-recurring congestion occurs by unexpected or non-recurrent incidents, such as traffic accidents, special events (e.g., large-scale sports or activities), and inclement weather.

The purpose of the traffic analysis conducted for the PEL Study is to address recurring congestion that normally occurs during weekday morning and evening "rush hour" traffic periods. The design

of a roadway facility is typically based on providing acceptable levels of service during these time periods, not for special event non-recurring congestion.

It is recognized that Penn State University holds or sponsors special events such as football games, concerts, arts festival, and graduations that attract a substantial amount of traffic that travels through the PEL study area. This traffic is not the focus of the operational analysis for the PEL Study (including the Study's purpose and need analysis), however, non-recurring traffic impacts may be considered in the evaluation of alternatives, as appropriate. Additionally, any alternative that meets the study's purpose and need would likely provide benefit during non-recurring congestion events.

EF-4: As part of the preliminary engineering and environmental studies (National Environmental Policy Act [NEPA]) phase of the project, detailed studies to identify natural, cultural, agricultural, and social resources will be conducted. Potential impacts to natural resources (including wetlands, streams, forestlands, agricultural, and threatened and endangered species) would be considered in an effort to avoid and minimize impacts to these valuable and protected resources to the extent practicable. Please see comment response EF-7 below regarding Greenhouse gas (GHG)/Climate Change.

EF-5: The No Build Alternative does not meet the transportation needs of the study area. The needs identified in this area included concern for safety, congestion, and meeting driver expectations for travel in the area.

EF-6: According to research published by the Transportation Research Board (TRB) and the Journal of Transport and Land Use, "latent demand" and "induced demand" are two concepts in transportation planning that describe different aspects of travel behavior and its relationship with infrastructure and services.

Latent demand refers to the existing or potential travel demand currently unmet or underserved due to various reasons such as lack of infrastructure, limited services, or other constraints. Induced demand refers to the phenomenon where the expansion or improvement of transportation infrastructure or services leads to an increase in travel demand beyond what was initially anticipated. This increase in demand is often attributed to factors such as reduced travel time, improved accessibility, or enhanced convenience resulting from the new infrastructure or services.

The phenomenon of latent/induced demand occurs with transportation improvement projects when a bottleneck is removed, capacity/throughput is increased and a faster route results in a shifting of traffic to the faster route.

These dynamics are taken into account as part of the travel demand/traffic forecasting process with the use of the Centre County Regional Travel Demand Model (CCRTDM). Future traffic volumes generated by a travel demand model are based on the existing roadway network with future planned/programmed transportation improvements as well as existing development and anticipated future development, through coordination with the county and local municipalities (cities, boroughs, and townships) within the surrounding region. Thus, the use of a travel demand model in the traffic forecasting process helps designers better predict the change in travel patterns/volumes that are anticipated to occur with a regional transportation improvement project

such as the State College Area Connector. The goal of the State College Area Connector project is to shift modeled traffic volumes from the local roadway network to the Build Alternative to improve safety and provide an efficient way for traffic to move through the area rather than have traffic impact the local roadway network (No Build Alternative).

EF-7: GHG/Climate Change is a complex issue that is related to regional factors. Project level details are evaluated to ensure they are consistent with regional conformity objectives; however, there is no real mechanism to assess GHG/Climate Change with a meaningful level of detail for individual alternatives of a specific project at the planning level. For transportation projects, congestion is one of the main considerations for potential air quality issues. Since reducing congestion was part of the stated purpose and need of this project, all of the alternatives that were advanced through the Level 2 Screening, which include both the US 322 and PA 144 alternatives, would be considered as sufficiently meeting the regional conformity objectives.

A qualitative evaluation of air quality (which includes GHG and Climate Change) will be completed for the State College Area Connector project as part of the NEPA analysis. Both the Pennsylvania Climate Action Plan and Centre Region Climate Action Plan have been reviewed and will be considered as environmental studies progress.

The strategies and objectives to reduce GHG emissions of both the state and local Climate Action Plans will be taken into consideration and incorporated into the air quality and climate change analysis for the State College Area Connector project as more detailed data becomes available during the NEPA process. These considerations will be consistent with current regulations and requirements, using the most current available tools and methodologies.

**Commenter:** Foust, Dennis

**From:** dfoust@pottertownship.org <dfoust@pottertownship.org>

**Sent:** Thursday, March 16, 2023 8:39 PM

**To:** Ball, Dean D <deball@pa.gov>

**Cc:** Denny Foust <dfoust@pottertownship.org>; 'Dick A Decker' [REDACTED] Glenn Roth

<groth@pottertownship.org>; 'Jake Tanis' [REDACTED] 'Melvin Dutrow' [REDACTED]

**Subject:** [External] Review of the PEL Study

I want to thank PennDOT District 2 personnel for the invite to the Informational Meeting March 7, 2023 at Boalsburg Fire Company on the PEL Study results-to-date.

As one of the Supervisors of Potter Township, I, as many of my constituents, am concerned about the increasing traffic passing through the Route 322 corridor under study, and, concerned for those citizens who will follow me. To be sure we have the correct alignment is of prime importance, and for the Penns Valley EMS and Centre Hall-Potter Fire companies, a safety concern for the future.

I encourage acceptance of the **10 EX** route between Potters Mills and the PCI area. Such route, with an exit near Summer Lane seems to provide the best access to the Potter Athletic Complex (PAC). In studying the design, it seems to affect our athletic fields, but I believe this alternate route will provide better access to future uses of the complex. Minimal **prime** farm land will be taken by this alignment, conserving and protecting needed land in the Township.

DF-1

In concert with the other Supervisors on the Board of Supervisors in Potter Township, I personally object to an unneeded diversion of traffic on the proposed alternate connector to Route 45. This road is already heavily used by traffic going to the State College metropolitan area, and by commercial delivery and dump truck traffic bound for Route I-99, and subsequently to Route I-80.

DF-2

Improving this corridor will pay benefits to the residents of Potter Township long after I am gone. It is an improvement that is much needed.

Dennis Foust, Supervisor  
Potter Township Board of Supervisors

[dfoust@pottertownship.org](mailto:dfoust@pottertownship.org)

**Response:**

DF-1: Thank you for your comment.

DF-2: PennDOT understands the concern that the community has regarding the PA 45 connector. PennDOT is committed to conducting more detailed traffic analyses to evaluate the US 322 to PA 45 connection. Under any of the Build Alternative scenarios (US 322-1OEX, US 322-1S, or US



322-5), should the traffic analyses indicate that a connector is necessary to improve mobility and aid the State College Area Connector project in meeting the defined transportation purpose and need, PennDOT will include the US 322 to PA 45 connection. PennDOT will work with Potter Township and area residents to minimize impacts to the surrounding community. Additionally, should the associated analysis show that the Build Alternative, with the connector, adversely impacts conditions on PA 45, PennDOT would incorporate necessary improvements into the project. Conversely, if the analyses determines that a US 322 to PA 45 connection is not necessary to improve mobility and aid the State College Area Connector project in meeting the defined transportation purpose and need, the connection will be removed from the project.

**Commenter:** Fowler, Chris

-----Original Message-----

From: Chris Fowler [REDACTED]

Sent: Friday, February 17, 2023 9:47 AM

To: Ball, Dean D <deball@pa.gov>

Subject: [External] Comment on Traffic Analysis Technical Memo for proposed SCAC project

Thank you for the opportunity to review the documents for the SCAC proposed alternatives. I am writing as someone who was formerly employed as a transportation planner writing studies like the one I just read.

I want to voice my extreme displeasure at the lack of any consideration of induced demand associated with this proposed highway 'improvement.' The topic of induced demand is not mentioned even once in the technical documents I reviewed suggesting an intentional blindness to our understanding of how LOS shifts traffic patterns. A major reason this segment of road is inadequate in the future has to do with trucks using 322 to avoid tolls and traffic on other major PA highway corridors. The reason more trucks don't use the corridor is that it is a relatively inconvenient road to drive on because it is narrow and just two lanes. The increases in traffic between the build and no build alternatives massively underpredicts this impact. I see no reason to believe that the projected difference between the LOS with build and no build scenarios is at all credible. Moreover, the build scenario just advantages the trucks transiting through our region without providing benefit to those with origins and destinations in the region. In short, LOS improvements could be achieved by making other existing connections more attractive to the trucks.

CF-1

I also want to comment on the analysis of LOS for bike users in the corridor. Perhaps I missed it in the report, but how exactly does the proposed 'improvement' support regional plans to improve bike connectivity? 322 is not a good place for bikes right now, but it is not clear how making it a limited access highway would improve that quality since bikes would then be excluded. The entire LOS study for bikes seems disingenuous to me and misses a significant opportunity to think seriously about how bike infrastructure could be incorporated into the larger set of plans. If this project is intended to provide something of value to local residents and not just increase the speed of through traffic then this needs to be a much larger component of the overall thinking about alternatives.

CF-2

The other area of concern I have relates to the change in character that the proposed alternatives would impose on the region. The area of affected roadway includes access to Colyer Lake, Tussey Mountain, Rothrock and several other key access points to our region's natural beauty. So many of our natural resources are already impacted by major highway projects that it is a real tragedy to imagine these places impacted as well. When I paddle Spring Creek in the spring the noise from the highway impacts one of the prettiest stretches of stream, and the highway interrupts right of way for fishermen and other river users. I see the proposed connection as having a similar dampening effect on the colyer/tussey/rothrock corridor creating noise and pollution that will be clearly audible and visible from the ridgeline trails that are becoming a focus of this region's recreational activities. I see little indication that this impact is given serious treatment in the study and beg you to take it into further consideration when assessing the economic impacts. The region is poised to become a destination for recreation as we develop our natural resources to be more welcoming to hikers, bikers, and other users. The proposed alternative would actively work against this area of economic development and will undermine quality of life irrevocably.

CF-3

In summary, I find this proposed 'improvement' to have significant negative consequences to our region and that its rosy outcomes in terms of traffic ignore any serious consideration of the way that all the expense and hassle will produce no actual improvement in LOS as induced demand eats up whatever gains models using current demand predict.

CF-1

Thank you again for the opportunity to comment,

Chris Fowler PhD.  
State College PA

**Commenter:** Fowler, Chris

**Comment Response:**

**CF-1:** According to research published by the Transportation Research Board (TRB) and the Journal of Transport and Land Use, "latent demand" and "induced demand" are two concepts in transportation planning that describe different aspects of travel behavior and its relationship with infrastructure and services.

Latent demand refers to the existing or potential travel demand currently unmet or underserved due to various reasons such as lack of infrastructure, limited services, or other constraints. Induced demand refers to the phenomenon where the expansion or improvement of transportation infrastructure or services leads to an increase in travel demand beyond what was initially anticipated. This increase in demand is often attributed to factors such as reduced travel time, improved accessibility, or enhanced convenience resulting from the new infrastructure or services.

The phenomenon of latent/induced demand occurs with transportation improvement projects when a bottleneck is removed, capacity/throughput is increased and a faster route results in a shifting of traffic to the faster route.

These dynamics are taken into account as part of the travel demand/traffic forecasting process with the use of the Centre County Regional Travel Demand Model (CCRTDM). Future traffic volumes generated by a travel demand model are based on the existing roadway network with future planned/programmed transportation improvements as well as existing development and anticipated future development, through coordination with the county and local municipalities (cities, boroughs, and townships) within the surrounding region. Thus, the use of a travel demand model in the traffic forecasting process helps designers better predict the change in travel patterns/volumes that are anticipated to occur with a regional transportation improvement project such as the State College Area Connector. The goal of the State College Area Connector project is to shift modeled traffic volumes from the local roadway network to the Build Alternative to improve safety and provide an efficient way for traffic to move through the area rather than have traffic impact the local roadway network (No Build Alternative).

**CF-2:** Local road improvements to existing US 322 will also be made in conjunction with construction of a new limited facility where needed in order to maintain local access along the existing US 322 corridor. As discussed in the Draft PEL Study report and other supporting documents, traffic volume projections associated with the US 322 Build Alternatives show a significant reduction in the local traffic that would remain on the existing US 322 local roadway. This reduction in traffic volumes on existing US 322 along with its existing wide shoulders results in improved bicycle Level of Service (LOS).

**CF-3:** Visual impacts will be evaluated during the preliminary engineering and environmental studies (National Environmental Policy Act [NEPA]) phase in the project development process. During these detailed studies, design considerations for proposed transportation improvements will be assessed to reduce visual impacts associated with the proposed improvements. This assessment will not only address efforts to avoid or minimize adverse visual impacts but also potential mitigation measures such as roadside landscaping and context sensitive designs

(includes coordination with the local community and consideration of using material, forms, and finishes of highway structures to mimic, complement, or contrast with the existing cultural environment visible from the project corridor, as desired by the community).

Noise will also be evaluated as part of the NEPA phase of the project development process. During this phase, PennDOT will conduct a Preliminary Design Highway Traffic Noise Assessment for the proposed alternatives. State and Federal Guidelines require PennDOT to use a standardized process to identify locations where abatement is potentially warranted, feasible, and reasonable considering peak hour noise levels and the potential effectiveness of noise abatement measures. The Noise Assessment will be reevaluated in the Final Design process before final determinations regarding potential noise abatement designs are made for the project.

Access to the Colyer Lake, Tussey Mountain, Rothrock State Forest, and other natural recreational sites in the area will be maintained and efforts will be undertaken to avoid direct or indirect impacts to these resources which include economic losses. Section 4(f)/Section 2002 requirements which require consideration of park and recreational lands, wildlife and waterfowl refuges, and historic sites in the transportation development process will be followed.

**Commenter:** Fowler, Lara

March 19, 2023

Dean Ball, PE  
PennDOT District 2-0  
PennDOT Drive  
Clearfield, PA 16830

Dear Mr. Ball,

Thank you for the chance to comment on the State College Area Connector PEL Study Draft Report. After reviewing this draft report, I wanted to convey some comments for your consideration. As background, I have worked as a professional mediator and facilitator on complex environmental and natural resource issues. This experience included staffing a proposed Regional Transportation Improvement District for 2.5 years in the Puget Sound region of Washington State. My comments represent my own views and no one else.

Community engagement: I appreciated the level of detail provided in this report related to the amount and type of community engagement, both with the general public and with elected officials. While the number of meetings is impressive, my sense is there is still a disconnect between what PennDOT is trying to convey about this project and what community members are understanding. The world of transportation is one of acronyms. In attending one of the October 2022 public meetings, for example, I found that despite having worked in the transportation world, I could barely keep track of what the presentation covered. The PEL did a good job in defining acronyms and providing a glossary; this same type of translation is needed for public presentations as well. While recognizing the need to keep this project moving, developing a community advisory board might also be helpful: people who represent a variety of perspectives who could help consult on ways to effectively engage with this community.

LF-1

Induced demand and truck traffic:

While the PEL discusses current truck traffic and likely increases, the PEL does not discuss induced demand by increasing the capacity of the existing 322 corridor from where it is 2 lanes to 4 lanes. In addition, the "study area boundary" is the 70 square miles in Centre County; however, the PEL notes in several places that transportation routes in this region serve a much larger area:

- Routes through Centre County serve national and international trade (page 9)
- The regional travel pattern addresses a high percentage of through trips (page 12)
- Almost 90% of heavy trucks had a starting and ending point outside the study area (page 19)

Regional transportation dynamics beyond just Centre County should be examined, lest improving the existing two lanes into four lanes induce further demand for through truck traffic. Studies elsewhere in the US have concluded that simply adding more road capacity does not decrease congestion; see, e.g., ICF, *Caltrans Greenhouse Gas Emissions and Mitigation Report*, CAL. DEPT OF TRANSP. (CALTRANS), 4 (Aug. 2020). <https://dot.ca.gov/-/media/dot-media/programs/transportation-planning/documents/office-of-smart-mobility-and-climate-change/ghg-emissions-and-mitigation-report-final-august-2-2020-revision9-9-2020-a11y.pdf>.

LF-2

Climate concerns:

As you consider potential alternatives, considering climate contributions and impacts is critical. The PEL currently does not discuss climate at all. The Federal Highway Administration recently released a guidance memo noting the need to prioritize "infrastructure that is less vulnerable and more resilient to

LF-3

a changing climate.” See FHWA Guidance memo, [https://www.fhwa.dot.gov/bipartisan-infrastructure-law/using\\_bil\\_resources\\_build\\_better\\_america.cfm](https://www.fhwa.dot.gov/bipartisan-infrastructure-law/using_bil_resources_build_better_america.cfm).

At the Commonwealth level, the Pennsylvania Climate Action Plan lists transportation as contributing 24% of Pennsylvania’s greenhouse emissions (the second largest source of emissions behind electricity generation). See PA Climate Action Plan at <https://www.dep.pa.gov/Citizens/climate/Pages/PA-Climate-Action-Plan.aspx>. This Action Plan includes reducing vehicle miles traveled for single occupancy vehicles as one way to address transportation emissions, particularly by creating opportunities for multi-modal travel (GHG Reduction Strategy F, pages 57-59). In addition, the Action Plan recognizes the threat of climate impacts on transportation, especially from flooding and stormwater (see, e.g., page 142).

LF-3

Finally, the Centre Region Council of Governments also recently adopted a Climate Action and Adaptation Plan (CAAP) with sustainable transportation as a key focus; see [https://issuu.com/crcog/docs/caap\\_report\\_final\\_optimized\\_112221\\_with\\_links](https://issuu.com/crcog/docs/caap_report_final_optimized_112221_with_links). The CAAP notes that transportation is currently 20% of local GHG emissions. As part of its “sustainable transportation” efforts (see page 68 et. seq.), the Centre Region CAAP recognizes the need to reduce trips with one driver. It also highlights the need to align land use and housing with transportation infrastructure to increase access to walking, biking, and public transit. Finally, it notes the need to improve and build resilience into our transportation systems, especially from potential flooding impacts. The PEL does not discuss this plan at all.

#### Protection of Agricultural Lands

In considering the alternatives, protecting agricultural lands in this region is important both for local economic activity and food supply, but also to help protect against predicted climate impacts (especially flooding and stormwater). The U.S. Farmland Protection Policy Act (1981) “intends to minimize the extent to which Federal Programs contribute to the unnecessary and irreversible conversion of farmland to nonagricultural uses.” See generally [https://www.environment.fhwa.dot.gov/env\\_topics/ecosystems\\_vegetation.aspx](https://www.environment.fhwa.dot.gov/env_topics/ecosystems_vegetation.aspx).

LF-4

As noted in the PEL, “ALCAB approval that the selected alternative is the most reasonable and prudent alternative must be obtained before condemnation proceedings can begin” (PEL, page 57). It is not clear when such approval must be sought (other than before condemnation proceedings). Providing more information about this process may be helpful.

#### Multi-modal alternatives

The purpose statement of the PEL recognizes the need to “address[] system continuity with consideration for all modes.” However, more is needed to ensure the proposed project is not just focused on vehicles as a mode of travel. For example, the PEL does not include any information about the current route’s hazard to users like bikers or runners. On page 22, the PEL observes that roadways in the key study area are “best suited for very experienced riders” and that by 2050, increased traffic volumes will create “a less than ideal riding environment for cyclists.” While I have seen a few bicyclists along Route 322, this route seems to be too hazardous to safely ride as it is currently configured. Additional information about usage and potential accidents would be useful. In addition, meeting the stated goals of ensuring multi-modal connections through this region is critical in going forward, both for safety but also to meet state and regional climate goals to provide transportation alternatives. Finally, ensuring adequate multi-modal improvements—not as an afterthought but as central to this overall project— could help with local community development, including connecting with resources like Rothrock State Forest.

LF-5

## Impacts of alternatives

All remaining alternatives would have impacts on water, wildlife, habitat, and the greater environment; these are important to examine in more detail, both the impacts and how to address them. Because of the proximity to Rothrock State Forest, potential safety concerns both for humans and animals are very real; I did not see this kind of concern addressed in the PEL.

LF-6

I also wanted to stress the impact of noise, particularly on recreational areas such as Rothrock State Forest. The PEL currently lists a potential noise study, but this is the only time noise is mentioned. For the importance of this, see <https://www.fhwa.dot.gov/environment/noise/>. Recreational areas like Rothrock are important in part because they are quiet; subjecting this kind of recreational area to the sound of a 4 lane highway may be a significant impact.

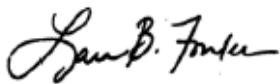
LF-7

I look forward to the NEPA analysis, which under NEPA will presumably include a "No Action Alternative" even though the PEL has apparently taken this off the table.

LF-8

Overall, I appreciate the opportunity to review this document and offer comments.

Yours truly,



Lara B. Fowler  
State College, PA

## **Response:**

LF-1: Thank you for your comment regarding community engagement.

LF-2: According to research published by the Transportation Research Board (TRB) and the Journal of Transport and Land Use, "latent demand" and "induced demand" are two concepts in transportation planning that describe different aspects of travel behavior and its relationship with infrastructure and services.

Latent demand refers to the existing or potential travel demand currently unmet or underserved due to various reasons such as lack of infrastructure, limited services, or other constraints. Induced demand refers to the phenomenon where the expansion or improvement of transportation infrastructure or services leads to an increase in travel demand beyond what was initially anticipated. This increase in demand is often attributed to factors such as reduced travel time, improved accessibility, or enhanced convenience resulting from the new infrastructure or services.

The phenomenon of latent/induced demand occurs with transportation improvement projects when a bottleneck is removed, capacity/throughput is increased and a faster route results in a shifting of traffic to the faster route.

These dynamics are taken into account as part of the travel demand/traffic forecasting process with the use of the Centre County Regional Travel Demand Model (CCRTDM). Future traffic

volumes generated by a travel demand model are based on the existing roadway network with future planned/programmed transportation improvements as well as existing development and anticipated future development, through coordination with the county and local municipalities (cities, boroughs, and townships) within the surrounding region. Thus, the use of a travel demand model in the traffic forecasting process helps designers better predict the change in travel patterns/volumes that are anticipated to occur with a regional transportation improvement project such as the State College Area Connector. The goal of the State College Area Connector project is to shift modeled traffic volumes from the local roadway network to the Build Alternative to improve safety and provide an efficient way for traffic to move through the area rather than have traffic impact the local roadway network (No Build Alternative).

LF-3: Greenhouse gas (GHG)/Climate Change is a complex issue that is related to regional factors. Project level details are evaluated to ensure they are consistent with regional conformity objectives; however, there is no real mechanism to assess GHG/Climate Change with a meaningful level of detail for individual alternatives of a specific project at the planning level. For transportation projects, congestion is one of the main considerations for potential air quality issues. Since reducing congestion was part of the stated purpose and need of this project, all of the alternatives that were advanced through the Level 2 Screening, which include both the US 322 and PA 144 alternatives, would be considered as sufficiently meeting the regional conformity objectives.

A qualitative evaluation of air quality (which includes GHG and Climate Change) will be completed for the State College Area Connector project as part of the National Environmental Policy Act (NEPA) analysis. Both the PA Climate Action Plan and Centre Region Climate Action Plan have been reviewed and will be considered as environmental studies progress.

The strategies and objectives to reduce GHG emissions of both the state and local Climate Action Plans will be taken into consideration and incorporated into the air quality and climate change analysis for the State College Area Connector project as more detailed data becomes available during the NEPA process. These considerations will be consistent with current regulations and requirements, using the most current available tools and methodologies.

LF-4: PennDOT recognizes the importance of farmland in the study area and that the extent of the productive agricultural land, and the viability of the farm operations/businesses are not only major contributors to the local economy but also contribute to the cohesion of the rural community and the historic heritage of the study area. Given the extent of farmland in the study area, it is not possible for a major transportation improvement project to avoid all potential impacts. However, PennDOT will make every effort to minimize impacts to these resources. To fully understand the farm operations in the area and how to best minimize potential impacts, PennDOT anticipates that a Farmland Assessment Report will be prepared during the detailed studies conducted in the preliminary engineering and detailed environmental studies (NEPA) phase of the project development. Preparation of the report requires extensive interviews with all potentially impacted farm operators to identify and document the nature, features, and extent of their operations, including all farm-related structures, existing access and pathways, and other resources of the farm operation. Interviews with farm operators and landowners will also identify any leased properties required for the successful operation of potentially affected farm operations. The report will also document the potential avoidance and minimization measures considered and the



assessment of potential impacts to the viability of individual operations. PennDOT cannot acquire right-of-way to productive agricultural land or Prime agricultural land unless the Agricultural Land Condemnation Approval Board (ALCAB) gives approval, or the landowner amicably agrees to the conversion to transportation use.

Additionally, the Farmland Protection Policy Act (FPPA) requires federal agencies to evaluate the impacts of an activity such as highway construction projects that would convert farmland to non-agricultural use through coordination with the U.S. Department of Agriculture (USDA) Natural Resources Conservation Services (NRCS) during the NEPA process. The USDA NRCS requires the completion of a Farmland Conversion Impact Rating Form to evaluate the significance of the proposed farmland impacts based on farmland and corridor assessment criteria. PennDOT will complete the NRCS-CPA-106 (AD-1006) form for Farmland Conversion Impact Rating and will coordinate with the USDA NRCS Pennsylvania State Soil Scientist, during the NEPA process to determine impacts to Farmland within the project study area. PennDOT will make every effort to minimize impacts to the conversion of farmland.

LF-5: As stated in Chapter 8 of the Draft PEL Study report, multi-modal improvements could be included as part of the Build Alternative, where appropriate, or programmed as new projects or upgraded facilities to improve multi modal connectivity throughout the study area. PennDOT is committed to working with the local municipalities to ensure that a holistic approach is taken when evaluating multi-modal connections in the study area as the design advances into the NEPA phase of the project as engineering of the alternatives progresses.

LF-6: Impacts to resources will be analyzed throughout the NEPA phase of the project as engineering of the alternatives progresses.

LF-7: Noise will be evaluated as part of the NEPA phase of the project development process. During this phase, PennDOT will conduct a Preliminary Design Highway Traffic Noise Assessment for the proposed alternatives. State and Federal Guidelines require PennDOT to use a standardized process to identify locations where abatement is potentially warranted, feasible, and reasonable considering peak hour noise levels and the potential effectiveness of noise abatement measures. The Noise Assessment will be reevaluated in the Final Design process before final determinations regarding potential noise abatement designs are made for the project.

LF-8: The No Build Alternative will be included in the NEPA analysis. This alternative will be evaluated for how well it would address the transportation purpose and need and for comparison purposes for the Build Alternatives to be considered.

**Commenter:** Gould, Thomas

**From:** Gould, Thomas J [REDACTED]  
**Sent:** Tuesday, February 21, 2023 8:59 AM  
**To:** Ball, Dean D <deball@pa.gov>  
**Cc:** Logue, Sheree F <sul459@psu.edu>  
**Subject:** [External] State College Area Connector - Comment

Dear Mr. Ball,

Thank you for providing the opportunity to comment on the State College Area Connector project. I realize that getting public consensus is not a realistic option. All three options will impact us. With that said, I believe PennDot would be wisest to pursue one of the two options with the connector to HWY 45. PennDot should be looking ahead for what will be needed in the future and that HWY 45 connector anticipates growth. It makes sense to do the project the right way now instead of having to do a second project later. Again, thank you for the opportunity to share my thoughts.

Sincerely,  
Tom

TG-1

Thomas J. Gould, Ph.D.  
Jean Phillips Shibley Professor of Biobehavioral Health  
Department Head  
Department of Biobehavioral Health  
219 Biobehavioral Health Bldg  
The Pennsylvania State University  
University Park, PA 16802  
[REDACTED]

## Response:

TG-1: PennDOT understands the concerns regarding the PA 45 connector. PennDOT is committed to conducting more detailed traffic analyses to evaluate the US 322 to PA 45 connection. Under any of the Build Alternative scenarios (US 322-1OEX, US 322-1S, or US 322-5), should the traffic analyses indicate that a connector is necessary to improve mobility and aid the State College Area Connector project in meeting the defined transportation purpose and need, PennDOT will include the US 322 to PA 45 connection. PennDOT will work with the townships and area residents to minimize impacts to the surrounding community. Additionally, should the associated analysis show that the Build Alternative, with the connector, adversely impacts conditions on PA 45, PennDOT would incorporate necessary improvements into the project. Conversely, if the analyses determines that a US 322 to PA 45 connection is not necessary to improve mobility and aid the State College Area Connector project in meeting the defined transportation purpose and need, the connection will be removed from the project.

**Commenter:** Gustafson, Marjorie

**From:** Marjorie Gustafson [REDACTED]  
**Sent:** Sunday, March 19, 2023 10:17 PM  
**To:** Ball, Dean D <deball@pa.gov>  
**Subject:** [External] State College Area Connector PEL Study

Dear Mr. Ball:

Although the PEL Study has been made public, it is not presented in summary form so that the average person can interpret impacts, if any, upon the three proposed routes PENNDOT already presented during the October 2022 public meeting.

MG-1

Any one of the three proposed routes along or near the existing 322 corridor from Potters Mills to Boalsburg will do irreparable damage to the rural and residential communities within the area. For the ease of truck drivers who have no local business in the State College area and for the ease of Penn State football fans (who travel here only 7-8 days a year), you will ruin a natural rural area with some of the loveliest scenic vistas in all of central Pennsylvania.

Living in Laurel Hills, a rural-clustering subdivision, I find that there is no need for a State College Area Connector. The current 322 road from Potters Mills to Boalsburg is sufficient, and I can easily access other areas and my own street in Laurel Hills upon my return home. The best solution is for PENNDOT to DO NOTHING. Leave 322 as it is. If you build an expressway through our quiet, rural-residential area, you commit an offense against the people who live here. If you build an expressway, undoubtedly more trucks will come with increased speed, noise, danger, exhaust fumes, and disfiguring of the landscape. Find a way to slow the trucks down rather than provide a speedway for them!

MG-2

Although people tell me that you already know what PENNDOT will do and that your outreach to the public is simply a public relations posture, I implore you to reconsider your plans in the interests of real people whose lives will be devastated, many more than just those whose property will be taken for public domain.

MG-3

I have yet to meet anyone in the local area who favors any of your three remaining proposed routes for the State College Area Connector.

Respectfully submitted,  
Marjorie Gustafson

## Response:

MG-1: The Executive Summary (pages 1-4) of the Draft PEL Study report provides an overview of the PEL Study, alternatives development and screening results, and the alternatives recommended for further study. Summary tables of environmental impacts and the environmental and engineering screening results for each alternative are found in Appendix B of the Draft PEL Study report.

MG-2: As design advances to the preliminary engineering and detailed environmental (National Environmental Policy Act [NEPA]) phase of the project, PennDOT will consider design solutions that aid in minimizing the footprint of the proposed facility, thus minimizing the overall impacts to natural, cultural, and socio-economic resources. Additionally, the identification of conceptual mitigation will begin during the NEPA phase of project development and be coordinated with the

resource agency and the public. The mitigation will be designed to address unavoidable impacts from the proposed project.

PennDOT utilizes various traffic calming measures throughout the Commonwealth. These types of measures were considered under the Transportation Systems Management (TSM) Alternative for this study. Through the screening process, it was determined that TSM solutions alone would not meet the identified transportation purpose and need of the PEL Study.

The phenomenon of latent/induced demand occurs with transportation improvement projects when a bottleneck is removed, capacity/throughput is increased and a faster route results in a shifting of traffic to the faster route.

These dynamics are taken into account as part of the travel demand/traffic forecasting process with the use of the Centre County Regional Travel Demand Model (CCRTDM). Future traffic volumes generated by a travel demand model are based on the existing roadway network with future planned/programmed transportation improvements as well as existing development and anticipated future development, through coordination with the county and local municipalities (cities, boroughs, and townships) within the surrounding region. Thus, the use of a travel demand model in the traffic forecasting process helps designers better predict the change in travel patterns/volumes that are anticipated to occur with a regional transportation improvement project such as the State College Area Connector. The goal of the State College Area Connector project is to shift modeled traffic volumes from the local roadway network to the Build Alternative to improve safety and provide an efficient way for traffic to move through the area rather than have traffic impact the local roadway network (No Build Alternative).

MG-3: PennDOT continues to follow the required and appropriate methodology in the planning, preliminary design, and environmental studies that have been conducted to date. Additionally, PennDOT has shared the analysis and results of the PEL documentation with the public and the Cooperating and Participating Agencies throughout the entire study process and will continue to do so moving forward.

Throughout the PEL Study process, PennDOT has considered all comments brought forward by the public and Cooperating Agencies. PennDOT has and will continue to utilize the input provided by the public and Cooperating and Participating Agencies to inform the analysis and design during the preliminary engineering and environmental studies (NEPA phase).

**Commenter:** Hansen, Matt

From: Hansen, Matt [REDACTED]  
Sent: Thursday, February 23, 2023 4:22 PM  
To: Ball, Dean D <deball@pa.gov>  
Subject: [External] State College Area Connector

Research has shown that roadway expansions don't actually alleviate traffic or spur economic growth in the long-term. Cancel this project and focus on re-directing the excessive truck thru-traffic towards other established routes. Instead, put the resources towards alternative transportation and public transit.

MH-1

**Response:**

MH-1: Transit was an alternative considered in the PEL Study process. It was not advanced as the transit concept would not address the study purpose and need. During the preliminary engineering and detailed environmental studies (National Environmental Policy Act [NEPA]) phase, support facilities to the Build Alternative will be considered, including park-and-ride facilities with electric charging stations. Additionally, PennDOT identified other localized independent transportation projects that could benefit the study area. These projects could include improvements to roadway intersections and segments, as well as improvements in bikeway connectivity, Centre Area Transportation Authority (CATA) transit routes, and other modes of travel, which could be advanced as separate transportation projects with independent funding mechanisms. If any of the independent projects are identified for further development, PennDOT would work with the Centre County Metropolitan Planning Organization (CCMPO) to plan and program these new projects accordingly.

The goal of the State College Area Connector project is to shift modeled traffic volumes from the local roadway network to the Build Alternative to improve safety and provide an efficient way for traffic to move through the area rather than have traffic impact the local roadway network (No Build Alternative). Based on the information collected and analysis completed, the advancement of the US 322-1OEX, US 322-1S, or US 322-5 Build Alternative corridor would provide benefits to local as well as regional travelers. Regional travelers would benefit by having a consistent travel experience with limited stoppage for local access movements. The local travelers would benefit as nearly 53% of all future traffic and 73% of truck traffic would be located onto the new facility, thus providing for easier local travel movements on the local roadway system.

**Commenter:** Harden, Frank

Franklin M. Harden  
Chair Harris Township Board of Supervisors  
118 Honeysuckle Drive  
Boalsburg, Pa. 16827

March 14, 2023

Mr. Dean Ball  
PennDot District 2  
SCAC PEL Study Coordinator

Subject: Comments on overall SCAC PEL Report

Sir, I would like to comment on several areas of the SCAC PEL Report. As you know Harris Township and its residents are not happy with the conclusions of the report. We feel the criteria rating was not representative of actual conditions of the area. The results were driven by the need to have a four lane access to Beaver Stadium. From the beginning it was obvious that PennDOT was determined to build a new 4 lane divided limited access highway on the current RT 322 corridor. The PEL report data was evaluated to accomplish this result. I will layout my reasoning and concerns below.

FH-1

The first indication of PennDot's desire was to change the name of the project. The refresh project was the Route 144, 45 and 322 data refresh. It didn't take long for the PEL study to become the State College Area Connector project. When the problems of the 3 routes were disclosed in the refresh, all three routes had safety and volume issues. Table 3-1 in the PEL Report show Route 322 had 27%, Route 144 had 28% and Route 45 had 36% of the accidents in this corridor. So why was the decision reached to only address Route 322 when together Route 144 and 45 had 64% of the accidents. Some of that answer could be found on table 2-1 where route 45 is considered by PennDot as a minor arterial road.

FH-2

PennDot believes that upgrades to these roads can be accomplished through the normal TIP program. We need to remember when the SCCCTS project was not funded. There were 8 safety improvements PennDot said would be done in that area. 20 years later, there are 2 of the 8 completed. We believe we need this project to solve all 3 routes issues and not just 1. The major safety issue on these roads is the truck traffic. This was identified many years ago when truck traffic was banned from Route 144. Before that Route 45 and 322 had a volume and speeding issues. Route 144 had the majority of accidents and problems. This was a decision that needed to be made at that time. Now we have spread the accidents between the 3 routes as evidence in table 3-1.

FH-3

The other concern we have is the greenhouse gasses. Harris Township has passed a resolution to eliminate greenhouse gasses in the Township by 2050. This proposal now says that truck traffic headed for Route 80 will go over 20 miles and through Harris Township. The alternative

FH-4

taking them 9 miles to connect was eliminated. The report was to address environmental issues. With this evidence I am not sure it does.

Alternatives were looked at, but the build alternative was selected. On table 6-1 of the PEL report, the comparison of Upgrade Existing to Build options scored the same screening criteria. But there was no look that showed a build and upgrade existing. If upgrading can solve the majority of the problems and a build can do the remainder, why wasn't that looked at. We believe that sending truck traffic to I80 the most direct way is the best answer for the regions commerce, safety and efficiency. If we choose one of the 144 options for the build and upgrade existing to routes 322 and Route 45, we would go a lot further to solve the issues of the entire corridor. Regardless of what PennDot believes, route 45 is a principal alternative highway. As development grows along the entire route 45 corridor from route 26 to Aaronsburg, the highway is no longer a rural road. We would like to see evaluation based on a hybrid of the alternatives suggested. The benefit of doing a hybrid is that it could be done sooner than later. PennDot believes we can do the upgrades to the existing two routes within the TIP process. Let's get that started immediately. Then the new build could be done in the current timetable.

FH-4

We would like a reconsideration of the Alternatives chosen. We believe the evidence points to that end. The major disappointment during this process is we have been pointing these issues out. The major flaw in PennDot's logic is that problems on Route 45 & 144 will go away. The problem is that Route 322 is carrying the majority of the traffic from outside the area now. Route 45 and 144 are traffic generated from the corridor itself. The proposal recommended in the PEL report does not identify that. The probability that the problems on those routes will go away are not good.

FH-5

Thank You for consideration.

Franklin M. Harden

**Commenter:** Harden, Frank

**Comment Response:**

FH-1: The foundation of the PEL Study was based on collecting traffic and other data to identify the transportation issues which lead to the development of the PEL Study purpose and need. The needs identified in this area included concern for safety, congestion, and meeting driver expectations for travel in the area. The congestion need was identified by conducting planning level traffic analyses/studies which were based on average daily traffic throughout the year for the current year traffic scenarios, not on special event traffic conditions. Traffic data collected for the project was obtained while schools (local primary schools as well as secondary schools) were open and analyzed based on daily and peak hour traffic volumes and conditions for the average weekday (e.g., Tuesday, Wednesday, Thursday) during a non-holiday/non-special event. The existing traffic conditions were then projected out to a design year of 2050 with no proposed improvements to see how the existing roadway network would function. This 2050 traffic projection was based on the MPO's model and anticipated growth rate.

FH-2: This PEL Study was designed to look at a broad geographic area, the study name was established by PennDOT to convey the general location of the study area and not a specific roadway termini or destination of any future transportation improvement project. During the refresh report, US 322, PA 45, and PA 144 were identified for data collection and analysis as these roadways are the key corridors for traversing through the study area. The PEL acknowledges that each of these roadways have existing issues to varying degrees regarding safety, congestion, design features, etc. This PEL Study was designed to identify transportation solutions that best address transportation needs for the entire study area. For this study, it was determined that a Build Alternative would provide the best opportunity to meet these needs. With respect to safety and crash analysis, both the US 322 and the PA 144 Build Alternatives showed safety improvements with respect to predicted crashes on the existing US 322, PA 45, and PA 144 (see the *Traffic Analysis Technical Memorandum for the State College Area Connector Planning and Environmental Linkages Study* Table 15). As a result, it determined that based on the environmental, planning, and engineering factors that the US 322-1S, US 322-1OEX, and US 322-5 would provide the best opportunity to minimize overall impacts while addressing the stated needs.

FH-3: As shown in Table 1 of the *Final Purpose and Need for the State College Area Connector Planning and Environmental Linkages* document, PennDOT has completed 12 safety projects along US 322 since 2005. Additionally, the PEL Study acknowledges that additional localized transportation improvements may still be necessary on the local roadway network. The process for addressing local transportation improvements is for the local municipality, MPO and PennDOT to identify the local project need and get the project placed on the Transportation Improvement Program (TIP). As stated above, this PEL Study was designed to identify transportation solutions that best address the transportation purpose and need for the entire study area. For this study, it was determined that a Build Alternative would provide the best opportunity to meet these needs. Essentially, one transportation solution will not be able to address every single transportation issue in the area, but the identified Build Alternative corridors will meet the Study's purpose and need and improve overall travel on the local roadway network.



F-4: PennDOT understands that air quality and greenhouse gas (GHG) is a concern relative to transportation. As previously discussed, GHG is a complex issue that is related to regional factors. Project level details are evaluated to ensure they are consistent with regional conformity objectives; however, there is no real mechanism to assess GHG with a meaningful level of detail for individual alternatives of a specific project. For transportation projects, congestion is one of the main considerations for potential air quality issues. Since reducing congestion was part of the purpose and need of this project, all of the alternatives evaluated, which include both the US 322 and PA 144 alternatives would be considered as sufficiently meeting the regional conformity objectives. Additionally, while the PA 144 Build Alternatives would provide a more direct connection to I-99/I-80, these alternatives were not recommended to advance as they had higher overall environmental impacts (e.g., farmland, threatened and endangered species habitat, public well proximity), did not meet the planning goals as well as other alternatives, and had higher overall engineering costs.

The Build and Upgrade Existing Alternatives were evaluated independently to see how they would address the Study's purpose and need. For purpose of this PEL Study, the Upgrade Existing alternative was identified for US 322 only based on the ability to connect to the logical termini and have limited roadway relocations to meet design criteria. PA 45 and PA 144 were not considered as an Upgrade Existing Alternative since they did not have direct connections with the logical termini or current roadway geometry would require substantial relocation of the existing roadway, which would essentially be a Build Alternative.

During early screenings, Level 1 and Level 2A screenings, both the Upgrade Existing and Build Alternatives were determined to meet the Study's purpose and need (Table 6-1). However, during later phases of investigation, Level 2B traffic analysis, the Upgrade Existing Alternative was determined to not improve safety and was found not to meet the purpose and need and ultimately dismissed from further consideration.

The PEL Study recognized the concerns that have been raised regarding travel conditions along PA 45. Chapter 9 of the Draft PEL Study report states, "Although geometric elements which do not meet current design criteria do not necessarily indicate unsafe conditions, a full safety analysis including an evaluation to determine possible correlations between crash history and geometric conditions could be conducted as an independent stand-alone project. This potential safety study along PA 45 could also be expanded to evaluate the need for other improvements involving other design elements such as shoulder widths, intersection geometry, sight distance, pedestrian/bicycle accommodations, and access management." PennDOT is discussing advancing this study to identify specific elements for improvement with the MPO.

At this time, even if an US 322 Upgrade Existing Alternative was viable and the PA 144 Build Alternative did not have excessive impacts, PennDOT would not look to advance both these alternatives simultaneously as the State College Area Connector project. Advancing both would drastically increase the impacts to the natural, cultural, and socio-economic resources and would be significantly more costly.

FH-5: Based on the data collected and the analysis conducted for the PEL Study, the results indicate that the US 322-10EX, US 322-1S, and US 322-5 Build Alternatives are the best alternatives to advance for preliminary engineering and detailed environmental investigations.

While these alternatives are not perfect and devoid of impacts, they best balance the potential for impact, while meeting the purpose and need. At this time, PennDOT is not considering any of the PA 144 Build Alternatives or the US 322 Upgrade Existing Alternative.

PennDOT recognizes that the proposed solution will not necessarily address every transportation issue in the PEL study area. However, the Build Alternative will address the identified purpose and need by improving travel on the key local roadway network. Additionally, any study area roadway substantially impacted as a result of a Build Alternative would be addressed as part of the Build Alternative for the future State College Area Connector project. Any independent transportation projects (Chapter 8) would be advanced through the traditional TIP process.

**Commenter:** Hartzell, Mara

**From:** Mara Hartzell [REDACTED]  
**Sent:** Thursday, March 2, 2023 4:54 PM  
**To:** Ball, Dean D <deball@pa.gov>  
**Subject:** [External] Brief public comment - 322 Connector

Hello Mr. Ball,

Wildlife cannot advocate for their own well-being and habitat. I hope there is more consideration given in future designs to not just minimize environmental impact as the minimum effort to avoid regulatory permits - but improve the overall environment with the addition of wildlife bridges and safe crossings to support thriving habitats. MH-1

Thank you for your time!  
Mara Hartzell

**Response:**

MH-1: The preliminary engineering and detailed environmental studies (National Environmental Policy Act [NEPA]) phase of the project development process includes consideration of wildlife and their habitats. Field surveys to complete wildlife habitat assessments will be completed as part of the detailed NEPA studies. These efforts may also include species presence/absence surveys. Impacts to wildlife habitat will not only consider habitat loss but also potential fragmentation. It is recognized that habitat fragmentation results in smaller unconnected areas that can reduce the quality of the remaining habitat and wildlife movement.

Mitigation measures will be considered during design to reduce adverse effects to wildlife. These could include incorporating wildlife crossings/corridors in the roadway design to allow wildlife to travel between existing viable habitats. Wildlife crossings that may be considered are bridges or oversized stream culverts that include a dry pathway parallel to the stream channel. These measures would not only promote safe passage for wildlife but would also reduce the potential for vehicle/wildlife collisions that makes the roadway safer for the travelling public. It is anticipated that impacts to wildlife habitats will require compensatory mitigation. This mitigation can be in the form of land acquisition for habitat preservation and/or restoration of disturbed lands to a natural state.

**Commenter:** Herndon, Matt

**From:** Matt Herndon [REDACTED]  
**Sent:** Friday, February 17, 2023 10:13 AM  
**To:** Ball, Dean D <deball@pa.gov>  
**Subject:** [External] State college Area Connector Draft PEL Feedback

Dear Mr. Ball,

I serve on the State College Borough Transportation Commission, but we have not fully discussed the Connector project yet so I'm writing this letter to you simply as a resident of State College. I want to make it clear that many residents of State College strongly oppose this project. We have read study after study that shows how expanding roads like this simply induces more car and truck traffic. It is also clear that additional car and truck traffic leads to more vehicle accidents, injuries and deaths.

MH-1

Rather than spend half a billion dollars on 13 miles of road PennDOT should look into reconnecting State College to the passenger rail network. Rail can transport far more people per hour than a similarly sized road and do it far more efficiently. The only mention of this that this document gives is to discuss converting the 27 mile former Lewisburg to Tyrone rail line to a bike trail. I love biking, but it would be better to convert this land back into passenger rail service.

MH-2

This study should quantify how much it would cost to reconnect State College with rail and the amount of goods and passengers such a connection could support and compare those numbers with these road projects. Rail would advance the goals of reducing crashes, improving transit ride quality, reducing congestion, protecting watersheds, preserving farmlands, reducing emissions, and preserving the history of our area. Any transit study which does not fairly consider trains is a failure and should be redone.

--Matt Herndon

## Comment Response:

MH-1: According to research published by the Transportation Research Board (TRB) and the Journal of Transport and Land Use, "latent demand" and "induced demand" are two concepts in transportation planning that describe different aspects of travel behavior and its relationship with infrastructure and services.

Latent demand refers to the existing or potential travel demand currently unmet or underserved due to various reasons such as lack of infrastructure, limited services, or other constraints. Induced demand refers to the phenomenon where the expansion or improvement of transportation infrastructure or services leads to an increase in travel demand beyond what was initially anticipated. This increase in demand is often attributed to factors such as reduced travel time, improved accessibility, or enhanced convenience resulting from the new infrastructure or services.

The phenomenon of latent/induced demand occurs with transportation improvement projects when a bottleneck is removed, capacity/throughput is increased and a faster route results in a shifting of traffic to the faster route.

These dynamics are taken into account as part of the travel demand/traffic forecasting process with the use of the Centre County Regional Travel Demand Model (CCRTDM). Future traffic

volumes generated by a travel demand model are based on the existing roadway network with future planned/programmed transportation improvements as well as existing development and anticipated future development, through coordination with the county and local municipalities (cities, boroughs, and townships) within the surrounding region. Thus, the use of a travel demand model in the traffic forecasting process helps designers better predict the change in travel patterns/volumes that are anticipated to occur with a regional transportation improvement project such as the State College Area Connector. The goal of the State College Area Connector project is to shift modeled traffic volumes from the local roadway network to the Build Alternative to improve safety and provide an efficient way for traffic to move through the area rather than have traffic impact the local roadway network (No Build Alternative).

With the construction of any of the US 322 Build Alternatives, the corresponding future year 2050 peak hour traffic capacity analyses show acceptable Level of Service (LOS) conditions along the new limited access roadway, as well as along the existing two-lane US 322 roadway that will remain to provide local access along the corridor. The results of year 2050 Highway Safety Manual (HSM) analysis (summarized in Table 15 of the *Traffic Analysis Technical Memorandum*) also shows improved safety (e.g., reduction in predicted number of crashes) for the US 322 Build Alternatives as compared to the No Build scenario.

MH-2: Passenger rail does provide the ability to move a greater number of people more efficiently than a single automobile or bus. However, passenger vehicles are only one aspect of traffic that is being considered as part of this PEL Study. Passenger Rail would not address any of the freight movement through the area that is using the local roadway network and creating conflicts with local traffic movements. Essentially to implement freight rail service and passenger rail service to function efficiently on this former line, dual tracks would need to be installed. This would therefore significantly increase the overall price and also the environmental impacts. This is not a reasonable alternative for this PEL Study.

**Commenter:** Herron, Alexander

**From:** Herron, Alexander C [REDACTED]  
**Sent:** Saturday, March 18, 2023 5:14 PM  
**To:** Ball, Dean D <deball@pa.gov>  
**Subject:** [External] Comment on State College Area Connector PEL

Hello,

AH-1

My name is Alexander Herron, and I am a law student at Penn State Law. I've lived in State College for nearly eight years and have personally used route 322 more times than I can count. In addition, I've spent much time reviewing the State College Area Connector project through a mediation course at Penn State law. As part of this course, I spent several class sessions role-playing a mediation involving the State College Area Connector. In this role play, I was drafted as PennDOT's regional manager tasked with supporting the route options presented in the recently published PEL study. After finishing our role play, I found that the most significant problem in the State College Area Connector is the lack of trust between the public and PennDOT.

After reading the study, I believe that PennDOT is doing everything in its power to reach the best possible option for US route 322. However, if PennDOT wishes to improve its public relations, it needs to do a better job of helping the general public understand why the options described in the PEL study are indeed the best and only options to improve traffic safety. Provided are a few points worth noting:

First, although the screening processes described in chapters 4 and 6 certainly presents a reliable method for determining the best available route options for US 322, those most affected by the project would have a difficult time understanding why they should trust PennDOT's data. For instance, the results in chapter 6 show that traffic and safety conditions would improve, but I found it difficult to find the exact model used to reach that conclusion. Are there so-called "industry standards" by which the engineers used to reach their conclusion? If so, why not inform the reader? Additionally, if said reliable model was used in another building project outside PA, why not tell the reader? Overall, a short paragraph on the metrics/models used to justify the conclusion would greatly improve transparency and legitimacy, especially if they can be linked to other successful projects.

AH-2

Second, since the East Palestine train derailment, I suspect that the public has lost much trust in the government's (both state and federal) ability to enforce environmental regulations in a way that best protects the public and the natural environment. What if certain exemptions are obtained that result in environmental issues years down the line? More importantly, can the public trust that PennDOT won't be seeking said exemptions going forward? To the PEL's credit, I thought it very useful that it provided a short list of the applicable federal regulations. Such transparency allows the public to conduct their own research and feel confident that the government intends to follow the law. However, I think a sort statement illustrating PennDOT's intent regarding any possible exemptions would greatly improve public relations.

AH-3

Finally, it goes without saying that any of the route options presented in the study would require substantial takings. Farms, homeowners, and business owners are at risk of losing their property. One question I received during our role-play was "how much will I be compensated for the loss of my land?" Of course, this is a very difficult question to answer. Nonetheless, such difficult questions should be addressed. If PennDOT wishes to improve its relationship with the public, it should be more transparent on how it plans to go about taking and compensating the affected landowners in the region. This doesn't mean offering an exact metric, but something explaining the process would certainly help.

AH-4

Thank you for taking my comment at this time.

Best regards,

**Alexander Herron**

*Penn State Law, J.D. Candidate 2023*

*Entrepreneur Assistance Clinic, Clinical Student*

**Response:**

AH-1: Thank you for your comment.

AH-2: The methods and tools available as industry standard practice in predicting traffic volume forecasts and evaluating traffic and safety conditions of highways and utilized for the State College Area Connector project include: a Cube travel demand computer model; the Highway Capacity Manual/Software (HCM/HCS); and the Highway Safety Manual (HSM); these were noted in *Traffic Analysis Technical Memorandum*. The Centre County Regional Travel Demand Model (CCRTDM) was used as part of the traffic forecasting process in developing the future year 2050 traffic volume projections for the no-build scenario as well as the Build Alternative scenarios; this model is utilized by the Centre County Metropolitan Planning Organization (CCMPO) in its transportation system evaluation of the regions roadways and in developing the Long Range Transportation Plan (LRTP). The Transportation Research Board (TRB) developed and updates the HCM/HCS; its procedures/methodology is the industry standard used to identify the Level of Service (LOS) (graded A thru F) of roadway segments or an intersection during peak hour traffic conditions, typically AM and PM on a normal weekday. TRB also developed the HSM which provides an industry standard crash prediction methodology as a tool for evaluating safety of roadways.

AH-3: The National Environmental Policy Act of 1969 (NEPA) requires the federal government and its agencies such as FHWA to assess the environmental impact of their undertaking and alternatives to major federal actions significantly affecting the environment. The federal agencies

are overseen by the President's Council of Environmental Quality (CEQ) regarding their implementation and enforcement of NEPA.

While this is still a PEL Study, PennDOT advanced the investigations to address federal, state, and local regulations, as appropriate, in the evaluation of alternatives to ensure that all regulatory requirements would be met during the NEPA phase, project development, and construction of the project. In addition, PennDOT has been working closely with state and federal regulatory agencies throughout the PEL Study. PennDOT, as a state agency that received federal funding, is not exempt from any federal or state regulations and will not be seeking any exemptions moving forward.

AH-4: A PDF of PennDOT's *Publication 83, When Your Land is Needed for Transportation Purposes (Some Questions and Answers on the PennDOT Acquisition Process)*. Additionally, staff from PennDOT's right-of-way unit have been present at all public meetings to answer individual property owner questions and will continue to be present at all future public meetings. During the right-of-way process, these types of decisions will be made on an individual basis.



**Commenter:** Ho, Julia

**From:** Ho, Julia Lien [REDACTED]  
**Sent:** Monday, March 20, 2023 7:48 PM  
**To:** Ball, Dean D <deball@pa.gov>  
**Cc:** Murnyack, Eric J <emurnyack@pa.gov>  
**Subject:** [External] Resident Opinion on Route 322 Expansion

Dear Mr. Ball and Mr. Murnyack,

My name is Julia Ho, and I am a full-time State College resident. I have recently learned about the 13 mile road expansion that is planned for the highway southeast of State College along the Route 322 corridor. I am strongly opposed to this expansion because it will destroy local farms and forest buffer areas, potentially increase traffic via induced demand, and cost \$500 million which should instead be spent on projects that make communities and environments healthier, like public transit and pedestrian infrastructure.

JH-1

I appreciate your time and effort regarding this issue and ask that you please consider my voice as a State College resident who is in favor of preserving the natural environment and finding more sustainable and economical ways to improve transportation throughout Pennsylvania.

Please reach out to me if you have any questions. Thank you for your time and consideration.

Sincerely,

Julia Ho

[REDACTED]  
PhD Student, Architectural Engineering  
Penn State University

## Response:

JH-1: PennDOT and FHWA initiated the State College Area Connector PEL Study to identify and assess transportation challenges within the study area to provide a foundation for the development and evaluation of a range of alternatives. Through an analysis of the existing infrastructure's inability to effectively serve the existing and projected movement of people and goods, a purpose and need statement was developed to define the direct transportation-related needs within the PEL study area. The transportation needs are: existing roadway configurations and traffic conditions contribute to safety concerns; high peak hour traffic volumes cause congestion and result in unacceptable Level of Service (LOS) (LOS D [rural only], E, or F) on US 322, PA 45 and PA 144 roadways and intersections within the study area; and the roadway network configuration in the study area lacks continuity and does not meet driver expectations. Through the alternative screening process, it was determined that alternatives (e.g., transit only or bicycle and pedestrian improvements) that do not address the movement of both personal automobiles and freight trucks would not meet the transportation needs in the area. Essentially,

the alternatives screening determined that three Build Alternatives (US 322-1OEX, US 322-1S, or US 322-5) would best meet the identified needs while minimizing potential impacts to the natural and built environment.

**Commenter:** Jackson, Henry

**From:** Jackson Henry [REDACTED]  
**Sent:** Wednesday, March 22, 2023 7:00 PM  
**To:** Ball, Dean D <deball@pa.gov>  
**Cc:** Murnyack, Eric J <emurnyack@pa.gov>  
**Subject:** [External] Against the State College Area Connector

To whom it may concern,

I am writing to express my opposition to the State College Area Connector project. I have been living in State College for almost ten years and I do not see any benefit from this project. On the contrary, I think it will have negative impacts on our community and environment.

First of all, the project is too costly and unnecessary. From what i can tell it will cost around 500 million dollars. This is a huge waste of public money that could be better spent on other priorities, such as bike infrastructure, or public transit.

HJ-1

Secondly, the project lacks evidence and justification. There is no clear data or analysis that shows how this project will improve traffic flow, safety. In fact, some studies suggest that building more roads will only induce more demand and congestion in the long run. If the goal of this project is really focused on reducing traffic on game days, a focus on buses from areas where people come from, or farther away communities would likely be more helpful.

HJ-2

<https://www.nytimes.com/2023/01/06/us/widen-highways-traffic.html>

Thirdly, the project will harm our natural and cultural heritage. The proposed route will cut through farmland, forests, and historic sites that are valuable for our ecology and identity. It will also increase air pollution, noise pollution, and greenhouse gas emissions that contribute to climate change. <https://www.statecollege.com/articles/local-news/harris-township-supervisors-speak-out-against-proposed-state-college-area-connector-options/>

HJ-3

Therefore, I urge you to reconsider this project and instead invest in alternative solutions that are more sustainable and beneficial for our community. For example, you could improve public transportation systems which would still allow people to come into our community without needing to drive.

HJ-1

Thank you for your attention and consideration.

Sincerely,  
A concerned voter

## Response:

HJ-1: PennDOT and FHWA initiated the State College Area Connector PEL Study to identify and assess transportation challenges within the study area to provide a foundation for the development and evaluation of a range of alternatives. Through an analysis of the existing infrastructure's inability to effectively serve the existing and projected movement of people and goods, a purpose and need statement was developed to define the direct transportation-related needs within the study area. The transportation needs are: existing roadway configurations and

traffic conditions contribute to safety concerns; high peak hour traffic volumes cause congestion and result in unacceptable Level of Service (LOS) (LOS D [rural only], E, or F) on US 322, PA 45 and PA 144 roadways and intersections within the study area; and the roadway network configuration in the study area lacks continuity and does not meet driver expectations. Through the alternative screening process, it was determined that alternatives (e.g., transit only or bicycle and pedestrian improvements) that do not address the movement of both personal automobiles and freight trucks would not meet the transportation needs in the area. Essentially, the alternatives screening determined that three Build Alternatives (US 322-1OEX, US 322-1S, or US 322-5) would best meet the identified needs while minimizing potential impacts to the natural and built environment. The preliminary planning-level cost estimate for these three Build Alternatives ranges from \$468 to \$517 million. Cost estimates will be refined as the engineering design is advanced. Additionally, multimodal improvements, such as bicycle and pedestrian improvements, could be included as part of the Build Alternative, where appropriate.

HJ-2: Chapter 4 of the Draft PEL Study report outlines the alternative screening process utilized for this study and Chapter 6 presents the results of the screening process. Based on the information collected and analysis completed, the US 322-1OEX, US 322-1S, and US 322-5 Build Alternative corridors were determined to best meet the transportation purpose and need identified in Chapter 3 from a traffic, engineering, environmental, and planning perspective. The advancement of any of these options would provide benefits to local as well as regional travelers. Regional travelers would benefit by having a consistent travel experience with limited stoppage for local access movements. The local travelers would benefit as nearly 53% of all future traffic and 73% of truck traffic would be located onto the new facility, thus providing for easier local travel movements on the local roadway system. Additionally, travel safety would be improved on the local roadway network. Under any of the US 322 Build Alternatives predicted crashes decreased on study area roadways due to the diverted traffic volumes, with existing US 322 having the largest decrease. Within the study area, the overall number of crashes would be reduced by approximately 18% and fatality/injury crashes were reduced by approximately 22%.

As summarized in the PEL Study and further explained in the *Traffic Analysis Technical Memorandum*, an origin and destination study was conducted at the start of the PEL Study to understand existing travel patterns and travel demand, and to aid in traffic forecasting. Essentially, this study provided insight on where vehicles traveling on the study area road network were coming from or going to. Figures 2 through 6 of this report illustrate how various vehicle types are traversing in the area. For example, nearly 59% of heavy truck trips headed west on US 322 are destined to points west on I-80 and 8% of heavy truck trips headed west on US 322 are destined to points south on I-99. Essentially, the traffic model that was used for the PEL Study did understand where people and goods were going to and coming from, and this information aided in the decision-making process.

It is recognized that Penn State University holds or sponsors events such as football games, concerts, festivals, and graduations that attract a substantial amount of traffic that travels through the PEL study area. This traffic is not the focus of the operational traffic analysis for the PEL Study (including the Study's Purpose and Need analysis). The traffic model is based on traffic for an average day throughout the year, not on special event traffic conditions. Traffic data collected for the project was obtained while schools (local primary schools as well as secondary schools) are

open. Traffic data obtained and analyzed for this study is based on daily and peak hour traffic volumes and conditions for an average day of the week (e.g., Tuesday, Wednesday, Thursday) during a non-holiday/non-special event. If PennDOT would design to accommodate special events, the transportation projects would be excessively large to accommodate additional traffic. Any proposed transportation project would improve event traffic but would not fully address all of the event traffic needs.

It is these analyses that supported the identification of the alternatives to advance for further study.

HJ-3: Through the screening process, PennDOT worked to identify, avoid, and minimize impacts to the natural, cultural, and socio-economic environments. As the project advances into preliminary engineering and detailed environmental investigations (National Environmental Policy Act [NEPA]), the engineering and environmental staff will continue to work to minimize impacts from the proposed project. This includes noise and air quality investigations. Mitigation measures will be identified and implemented for those unavoidable impacts.

**Commenter:** Knoll, Bruce

**From:** Bruce Knoll [REDACTED]  
**Sent:** Wednesday, March 15, 2023 5:39 PM  
**To:** Ball, Dean D <deball@pa.gov>  
**Subject:** [External] Connector Project

Hello Mr. Ball,

I am writing to comment on the draft for the State College Area Connector project.

In short, I am very much in favor of a new Route 322 into State College. The two lane road has proven dangerous in the past. As a frequent user of Route 322 from Old Fort Road to Boalsburg, I would welcome a four-lane highway instead of the current roadway as soon as possible. I realize that there are environmental concerns, and I trust that the State of Pennsylvania planners will take all the necessary actions to prevent damage to the environment along the proposed route. I also realize that no one is perfect, and it is possible that certain aspects of our environment could be compromised by the construction. But I also believe that the benefits to everyone in the central PA region would benefit from the new construction.

BK-1

Thank you for asking for my comments,

Bruce Knoll  
[REDACTED]  
[REDACTED]

**Response:**

BK-1: Thank you for your comment.

**Commenter:** Krentzman, Stephen

From: Stephen M. Krentzman [REDACTED]  
Sent: Thursday, February 16, 2023 12:56 PM  
To: Ball, Dean D <deball@pa.gov>  
Cc: Diane Krentzman [REDACTED]; Michael Krentzman [REDACTED] DAVID  
KRENTZMAN [REDACTED]  
Subject: [External] State College Area Connector Study- Release of Draft Pell

Dear Mr. Ball :

My family is the Owner of Dev Co. Inc. and the Developer of Laurel Hills Development, which is located at the corner of Bear Meadows Road and Route 322.

While we are aware that our region needs additional highway growth, we are very concerned that the location of the proposed Route 322 Improvement will negatively affect the Quality of Life for the people who purchased building lots from our company.

SK-1

Additionally, we have grave concerns that the threat of the new Route 322 location will continue to negatively impact our lot sales. It seems that potential buyers have refused to purchase our building lots due to their concerns that the new highway location will destroy their view of the golf course; will create highway noise that will disturb their peace; and, will generally ruin the rural flavor of Laurel Hills.

It would be our most serious concern that PennDOT's planning for the new Connector Road WILL MAINTAIN our current sight lines across Route 322; and would reduce the highway noise ; along with making a safer intersection at Bear Meadows Road and new Route 322.

SK-2

We thank you, in advance, for your favorable resolution of our concerns.

Sincerely Yours,

Stephen Krentzman  
Dev. Co., Inc. / Laurel Hills Development

[REDACTED]  
[REDACTED]  
[REDACTED]

**Response:**

SK-1: Topics which support quality of life for the community such as noise and visual effects will be evaluated as part of the preliminary engineering and environmental studies (National Environmental Policy Act [NEPA]) phase of the project development process. During these evaluations, design changes or mitigation could be identified to address potential impacts to the surrounding community.

PennDOT understands that during the planning of large transportation projects land sales may be temporarily affected. PennDOT is committed to advancing transportation projects as expeditiously as possible to minimize any impacts.

SK-2: Visual impacts will be evaluated during the NEPA phase in the project development process. During these detailed studies, design considerations for proposed transportation improvements will be assessed to reduce visual impacts associated with the proposed improvements. This assessment will not only address efforts to avoid or minimize adverse visual impacts but also potential mitigation measures such as roadside landscaping and context sensitive designs (includes coordination with the local community and consideration of using material, forms, and finishes of highway structures to mimic, complement, or contrast with the existing cultural environment visible from the project corridor, as desired by the community).

Additionally, noise will be evaluated as part of the NEPA phase of the project development process. During this phase, PennDOT will conduct a Preliminary Design Highway Traffic Noise Assessment for the proposed alternatives. State and Federal Guidelines require PennDOT to use a standardized process to identify locations where abatement is potentially warranted, feasible, and reasonable considering peak hour noise levels and the potential effectiveness of noise abatement measures. This process includes the following steps:

1. Identify land uses within the project area that are sensitive to noise, such as homes and parks.
2. Monitor existing noise levels and develop acoustical models to predict future conditions.
3. Evaluate predicted future noise levels after the highway project is constructed and identify locations where noise impacts are anticipated.
4. Consider noise abatement where noise impacts are anticipated.
5. Identify areas where preliminary noise abatement is potentially warranted, feasible, and reasonable.

The Noise Assessment will be reevaluated in the Final Design process before final determinations regarding potential noise abatement designs are made for the project.

Lastly, Chapter 8 of the Draft PEL Study report identifies several roadway intersections and segments that would benefit from localized independent projects, including the US 322 at Bear Meadows Road/Elk Club Road intersection.



Commenter: Miller, Thomas

-----Original Message-----

From: [REDACTED]

Sent: Sunday, February 19, 2023 1:59 PM

To: Ball, Dean D <deball@pa.gov>

Subject: [External] State College Area Connector Project: Public Comment

Mr. Ball,

I attended one of the public information meetings a while ago and recently skimmed the full 123 pages of the draft study of Connector Project. As a retired public official who was in office during earlier rounds of consideration of the Connector Project, I feel compelled to comment on my thoughts about the current Connector Project, as put forth in the draft study:

\*PennDOT's scope of project is insufficient. You are projecting an increase in 30+% truck traffic in the next 30 years. If this occurs, this segment isn't going to be your only problem. What plans are being made to handle the increase in traffic over Seven Mountains and the extreme speed differential between tractor trailers laboring up/down the grade and the ever increasing speeds of the automobiles who are speeding to get around them before they reach the top. I have personally observed speed differentials that I estimate to be in excess of 50mph between speeding autos and the trucks they are attempting to pass. I have seen speed enforcement at the top and bottom of the mountain by PSP and local law enforcement, but have never witnessed any speed enforcement on the grade going up/down the mountain despite the speed differentials observed there. With more traffic comes greater risk..so what is the plan to improve Seven Mountains?

TM-1

\*There is a south bound terminus on I-99 at the intersection with Route 64 near Pleasant Gap. It's obvious that a PennDOT engineer designed this terminus for greater things. A simple terminus would not have been built to the same standard as that which exists there. This leads me to believe that PennDOT envisioned future construction that would connect with the Potters Mills connector at some point in the future. Has anybody blown the dust off of those old plans to see what those engineers were considering back then? There might be a good solution in some of those old drawings that could create a direct connection to I-99/I-80 for non-local traffic.

TM-2

\*I don't have an emotional concern about any proposed alignment, however if you would divert truck traffic directly to I-80 via an alignment from Potters Mills to the I-99 terminus at Pleasant Gap, you could most likely satisfy safety requirements for traffic on SR322 between Potters Mills and Boalsburg with minimal improvements of the existing alignment.

TM-3

\*Since safety is frequently cited as a concern on all of the corridors, I must ask why speed enforcement is virtually non-existent on any of these corridors. Speeding and aggressive driving is commonplace on SR322. Harris Township lowered the speed limit, but it doesn't matter if there is no enforcement. Drivers do not decrease speeds when entering Harris Township from Potter Township. For that matter, vehicles coming off the Mt. Nittany Expressway rarely reduce and maintain the posted 45mph speed through Harris Township. It isn't going to happen without enforcement. I am aware that increased law enforcement presence in Harris Township must be initiated by the local municipality, however this could be expedited by a joint effort of PennDOT, the local municipality and PSP, as it was in the 1990's.

TM-4

\*Park & Rides and public transportation services are included in your study, but have limited application in Centre County. Very few adult residents (with exception of students) rely on public transportation. Those who do wouldn't be traveling on the proposed Connector, with the possible exception of the multiple family neighborhoods in Harris Township near the eastern terminus of the Mount Nittany Expressway. I wouldn't expect that to change with a new Connector.

TM-5

\*Bicycles are also addressed by the Study. I occasionally see a bicyclist along RT45 or on the South Atherton Street bicycle path and I understand the desire to promote alternative means of travel, but with the high percentage of "distracted" drivers prevalent on all highways these days, and higher speeds going unchecked, a bicyclist must be suicidal to ride along any major corridor with observed speeds above 35mph, including those in the Study.

TM-6

In summary: You employ many extremely talented engineers to do the math and determine the best solutions to problems like these. You need to trust them to do the required analysis and determine the most advantageous outcome, considering all variables. Members of the public, despite your best efforts to inform and seek input, are simply not as well informed as the professionals who are immersed in all of the details of projects like this, day after day. That said, I believe you need to consider improvements to Seven Mountains as part of this project. If additional traffic on SR322 is going to render SR322 inadequate, divert the non-local traffic directly to I-99 and I-80 from Potters Mills in the most expeditious manner. Direct "local" traffic, i.e. light trucks and automobiles to State College via modified existing corridor. Since it's been decades since study of this project began, and it will likely be decades until any construction actually happens, due to environmental studies, funding acquisition and legal battles, law enforcement should be deployed to SR322 immediately on a regular, but random basis, to encourage compliance with posted speed limits and discourage incidents of aggressive driving. It may also help to install some of the large orange warning signs that are frequently used in urban areas indicating reduced speed limit/aggressive driving area.

TM-7

I'm glad this isn't my problem to solve. You asked for comment. I provided it. If you have questions do not hesitate to contact me via email. I hope to hear from you.

Sincerely,

Thomas Miller  
Boalsburg, PA

## Response:

TM-1: Seven Mountains is outside of the PEL study area. Any concerns associated with that portion of the roadway should be brought to PennDOT's attention through the local municipality. Speed enforcement is always a concern when considering the safety of the traveling public, however it is not under PennDOT's purview and specific concern areas should be addressed with state and local law enforcement.

TM-2: PA 144 Build Alternatives were the only alternatives that would connect to I-99 at Pleasant Gap and were dismissed from further consideration during the PEL Study. Therefore, specific interchange improvements were not considered.

TM-3: Six Build Alternatives that connect US 322 at Potters Mill to I-99 near Pleasant Gap were considered as part of this PEL Study. While the PA 144 Build Alternatives would provide a more direct connection to I-99/I-80, these alternatives were not recommended to advance as they had

higher overall environmental impacts (e.g., farmland, threatened and endangered species habitat, public well proximity), did not meet the planning goals as well as other alternatives, and had higher overall engineering costs. Minor improvements or upgrades to US 322 would not be sufficient to address the identified transportation purpose and need. Chapter 6 of the Draft PEL Study report provides an overview of the screening results and the *Traffic Analysis Technical Memorandum* and *Alternatives Analysis Screening Report* provide additional information.

TM-4: Traffic law enforcement is always a concern when considering the safety of the traveling public, however it is not under PennDOT's purview and specific concern areas should be addressed with state and local law enforcement.

TM-5: A Transit Alternative was considered in the screening process but failed to meet the identified purpose and need and was dismissed from further consideration.

TM-6: As the project advances, multimodal improvements such as bicycle and pedestrian improvements, could be included as part of the Build Alternative, where appropriate.

TM-7: Regarding the Seven Mountains section of US 322, please see comment response TM-1. Regarding alternative development and selection, please see comment response TM-3. Lastly as presented at the public open house meetings in October 2022, PennDOT is anticipating initiating construction of early action projects in 2028.

**Commenter:** N., Peggy

-----Original Message-----

From: Peggy [REDACTED]  
Sent: Friday, February 17, 2023 9:59 AM  
To: Ball, Dean D <deball@pa.gov>  
Subject: [External] SCAC

Hello,

As a 20+ year resident of Boalsburg who resides in the Willowbrook development, I would ask that you please consider my concerns and suggestions. I appreciate having been given this opportunity to express myself.

I have been to two of the public meetings that have been available to us and have reviewed, quite extensively the maps.

The maps are quite impressive and helpful. What I have NOT heard about is how any of these options will affect us acoustically. I can tell you, as can my neighbors, that over the years as the truck traffic has increased, so has the highway noise. Specifically from the trucks. It's become so loud that when you're home is close to either 322 or 45, it's become a nuisance.

So as we look at the "recommend" route, it is not attractive to me or my neighbors in any sense. It's not just the noise to our neighborhood but to surrounding areas as well. The country club, Tussey Mountain, and agribusinesses to name a few. Biking and hiking trails with truck noise? We are losing our uniqueness.

Please address how the increase of traffic will have an impact on our small communities.

My second opinion is plan and simple. Take this extension with the least resistance. That would be either of 144 choices. It will be a more direct route and one that has fewer negative affects on our environment. It may cost more, but the cost is worthwhile.

Thank you again for the opportunity to express my opinion and concerns.

Thank you,  
Peggy N.

**Response:**

PN-1: Noise will be evaluated as part of the preliminary engineering and detailed environmental studies (National Environmental Policy Act [NEPA]) phase of the project development process. During this phase, PennDOT will conduct a Preliminary Design Highway Traffic Noise Assessment for the proposed alternatives. State and Federal Guidelines require PennDOT to use a standardized process to identify locations where abatement is potentially warranted, feasible, and reasonable considering peak hour noise levels and the potential effectiveness of noise abatement measures. This process includes the following steps:

1. Identify land uses within the project area that are sensitive to noise, such as homes and parks.
2. Monitor existing noise levels and develop acoustical models to predict future conditions.
3. Evaluate predicted future noise levels after the highway project is constructed and identify locations where noise impacts are anticipated.
4. Consider noise abatement where noise impacts are anticipated.

5. Identify areas where preliminary noise abatement is potentially warranted, feasible, and reasonable.

The Noise Assessment will be reevaluated in the Final Design process before final determinations regarding potential noise abatement designs are made for the project.

PN-2: Three Build Alternative options that connect US 322 at Potters Mill to I-99 near Pleasant Gap were considered as part of this PEL Study. While the PA 144 Build Alternatives would provide a more direct connection to I-99/I-80, these alternatives were not recommended to advance as they had higher overall environmental impacts (e.g., farmland, threatened and endangered species habitat, public well proximity) and did not meet the planning goals as well as other alternatives, in addition to having a higher overall engineering cost. Chapter 6 of the Draft PEL Study report provides an overview of the screening results and the *Traffic Analysis Technical Memorandum* and *Alternatives Analysis Screening Report* provide additional information.

**Commenter:** Nittany Valley Environmental Coalition (NVEC)

## **Section 1 (of 2 sections)**

### **Comments on February 2023 Draft PEL Study State College Area Connector**

As we maintained in our April 2022 and Nov. 2022 comments, a combination of Demand-Side Management/ Transportation Systems Management/Intermodal/minimum build approaches is preferable under all the applicable criteria including NEPA.

For the purposes of these comments on the 2023 draft PEL study, NVEC will now refer to this combination of Demand-Side Management/ Transportation Systems Management/Intermodal/ minimum build approaches as the “Combined Alternative.”

#### 7.1 Dismissed Alternatives

##### 7.1.1 Level 1 Screening

The TSM, TCM, Transit, and No Build Alternatives were dismissed from further study during the Level 1 Screening. These alternative concepts were qualitatively assessed and determined to be unable to meet the PEL Study purpose and needs to accommodate future congestion, improve safety, or provide system continuity. Screening details can be found in Chapter 4 of this Alternative Analysis and Screening Report memorandum.

Page 96

Alternative Analysis and Screening Report for the  
State College Area Connector Planning and Environmental Linkages

The February 2023 Alternatives Analysis and Screening Report makes clear for the first time what the problem is. Rather than evaluate the type of Combined Alternative that NVEC and other commenters are now describing, the PADOT evaluators originally looked at each tool in that tool box separately, and then set each aside one by one.

Despite the preponderance of most public and municipal comments, we now know that the original piecemeal dismissal was never revisited and adapted into a Combined Alternative for evaluation before issuing this draft PEL.

The persistence of this arbitrary segmentation is confirmed by the PADOT response to NVEC's Nov 2022 written comments:

*NVEC-2: As stated in the Final Purpose and Need for the State College Area Connector Planning and Environmental Linkage Study report and presented at the Open House Public Meetings for the project, the purpose of this study is to develop and evaluate a range of alternatives to improve mobility and meet regional traffic and local needs by reducing congestion, addressing safety, and improving system linkage and continuity within the study area.*

*A range of alternatives were considered and screened to meet these identified transportation needs. These alternatives included Transportation System Management (TSM), Transportation Control Measure (TCM) strategies, and Upgrade Existing Alternatives. Based on the screening, it was determined that TSM and TCM Alternatives would be unable to fully address the transportation needs within the study area and was dismissed from further study. The Upgrade Existing Alternative (adding lanes to existing US 322) would not improve safety; therefore, it would not meet the purpose and needs and was also dismissed from further study. All of the Build Alternative were found to meet the Study purpose and need. When balancing the traffic, engineering, environmental, and planning study results, US 322-1OEX, US 322-1S, and US 3225 were found to be the best alternatives to advance for further detailed study.*

NVEC maintains that by originally dividing up the individual systems management/intermodal/minimum build elements in this way, the PEL Study drew attention and focus away from evaluating a potentially viable Combined Alternative, and shifted its resources entirely towards winnowing through alternate “maximalist” interstate alignments to add four restricted access lanes to the existing two 322 travel lanes.

The advantage of employing a combined management/intermodal /minimum build solution is exactly that its elements are not mutually exclusive, but synergistic.

This Combined Alternative would represent an evolving flexible approach which can be informed in real-time by actual results on the ground; and need not be expensively imposed at the outset based on development projections or expectations alone.

Any minimalist build component of the Combined Alternative, which would most likely be rolled out incrementally over time, could eventually include the best aspects of what PADOT calls the “upgrade 322 alternative”, while avoiding its worst features such as dangerous jughandles and left hand turns. However, in the draft PEL study as it now stands, the “upgrade 322 alternative” was also arbitrarily evaluated apart from Combined Alternative elements which could correct many of the 322 upgrade’s inherent safety limitations.



Furthermore, the Combined Alternative is not incompatible with portions of a four-lane limited access highway eventually being built should the Combined Alternative become insufficient in the future. In fact, most of these combined/ minimum build elements can be implemented years before any one of the four-lane alternatives could even be started, let alone completed. Should the decision be to approve limited access interstate level construction at some future date, the Combined Plan elements would still be useful to safety and traffic flow during the years of construction.

For some reason the PEL Alternatives Screening procedure did not manage to weave these positive advantages into one coherent Combined Alternative after dismissing its potential components arbitrarily one by one so early in the process. There apparently was a fundamental flaw in this PEL Study workflow which did not enable PADOT to circle back and synthesize critical public comments into a new Combined Alternative for PEL evaluation prior to the start of NEPA review.

We can show then how this foundational limitation in the scope of the PEL study coupled with PADOT's own perception of its lack of authority to implement some of the Combined Alternative elements has tilted the PEL alternatives analysis towards traditional maximalist interstate highway approaches.

Thus there is insufficient legal basis for the categorical exclusion of a Combined Alternative from NEPA review. A combination TSM/DSM/Multimodal/ Minimum Build Alternative must be carried forward into the NEPA EIS process on an equal footing with 322-1OEX and 322-s1 and 322-5.

The precedent for this has been set by the PADOT PEL Study itself when it deferred consideration of the add-on 322/SR45 connector and Harley Shop area interchange until later in the regular NEPA EIS. A more complete examination of the environmental mitigations needed by 322-5, which are seen by NVEC to be disqualifying for that alternative, was also deferred until later in the NEPA process.

The forwarding into NEPA of these two determinative aspects of the alternatives analysis makes the consideration of a Combined Alternative during the more formal NEPA process all the more necessary and legally warranted.

This draft PEL study's conclusions therefore cannot be legally "incorporated by reference" so as to exclude full consideration of a Combined DSM/TSM/Multimodal/minimum build Alternative during the NEPA EIS process itself.

Dorothy Blair President  
Nittany Valley Environmental Coalition (NVEC)

David Stone for NVEC and pro se

March 19, 2023

Commenter: NVEC (cont.)

**Section 2 (of 2 sections) NVEC Comments on 2/2023  
State College Area Connector PEL Study**

**Comments on February 2023 Draft PEL Study  
State College Area Connector**

**In order to add specificity to NVEC’s position, we offer these reactions to some of PADOT responses to our Nov. 2022 comments:**

*NVEC-1*

*Commenter: Nittany Valley Environmental Coalition Comment Response  
NVEC-1: The State College Area Connector is currently in the planning phase of the transportation project development process, also known as a Planning and Environmental Linkage (PEL) Study. During this PEL Study, PennDOT hosted four specific meetings to obtain public input. Following each of these meetings, there is a designated comment period that is advertised to provide comments specifically on the meeting materials. The Coalition has submitted comments following two of those meetings. However, at this phase in the process, PennDOT has been accepting public comments and having discussions with the public, community leaders, and various organizations through the Study and will continue to do so.*

**NVEC reaction:**

**We are not sure why this was singled out in PADOT’s response, but some NVEC members have participated and commented as individuals at all 4 of the specific meetings referred to above. Although our standing and stakeholder 501c4 status flows from our individual and coalition members, it is true that NVEC as an organization only submitted formal written comments during the last 2 rounds.**

*PADOT NVEC-1 response continued:*

*PennDOT, in partnership with the cooperating agencies, has considered and incorporated all public comments during the PEL Study. This has resulted in*

*the identification of three alternatives that meet the purpose and need which are recommended to move forward into the NEPA phase. There is no formal intervention process. The Draft PEL Report will be provided for a 30-day public review and comment period. Additional public review and comment periods will also be provided as required during the NEPA phase. Dean Ball, PE, PennDOT project manager, can be contacted directly at DEBall@pa.gov if you should have additional comments on the PEL Study. PennDOT will make sure to include your associations on the Study email distribution list for all future Study announcements and notifications.*

**NVEC has to beg to differ here. The PEL Study may have listened politely to the public's and municipal officials concerns during the last 2 meetings but to say, as PADOT does here, that:**

*"PennDOT, in partnership with the cooperating agencies, has considered and incorporated all public comments during the PEL Study. This has resulted in the identification of three alternatives that meet the purpose and need which are recommended to move forward into the NEPA phase."*

**is quite a stretch. And this is especially jarring with respect to what we are calling the Combined Alternative. NVEC could have even called this the Consensus Alternative since it encompasses so many of the commenters' remarks made at the last two PEL public meetings.**

**Please go back to our discussion of this in Section One.**

————//————//

*NVEC-2: As stated in the Final Purpose and Need for the State College Area Connector Planning and Environmental Linkage Study report and presented at the Open House Public Meetings for the project, the purpose of this study is to develop and evaluate a range of alternatives to improve mobility and meet regional traffic and local needs by reducing congestion, addressing safety, and improving system linkage and continuity within the study area.*

*A range of alternatives were considered and screened to meet these identified transportation needs. These alternatives included Transportation System Management (TSM), Transportation Control Measure (TCM) strategies, and Upgrade Existing Alternatives. Based on the screening, it was determined that TSM and TCM Alternatives would be unable to fully address the transportation needs within the study area and was dismissed from further study. The Upgrade Existing Alternative (adding lanes to existing US 322) would not improve safety; therefore, it would not meet the purpose and needs and was also dismissed from further study. All of the Build Alternative were found to meet the Study purpose and need. When balancing the traffic, engineering, environmental, and planning study results, US 322-1OEX, US 322-1S, and US 3225 were found to be the best alternatives to advance for further detailed study.*

**NVEC’s reaction: Please go back to our discussion of this in Section One.**

————//————

*NVEC-3: US 322, in the study area, is a principal arterial highway owned by the Commonwealth and maintained by PennDOT. The purpose of principal arterial highways is to provide a high degree of mobility in urban or through rural areas. The State College area, which includes many traffic generators one of which is Penn State, is a major destination in the area, (accounting for just over 50% of passenger vehicle trips), it is not necessarily the destination for trucks traveling in the area (less than 10% of all trucks). PennDOT must develop and evaluate transportation solutions to address all the purpose and need of the study. As discussed, in NVEC-2, demand*

*side solutions (TSM or TCM alternatives) alone would not address the PEL Study purpose and need.*

*The PEL Study alternatives screening process considered federal, state, and local regulations, as appropriate, in the evaluation of alternatives to ensure that regulatory requirements will be met in future NEPA studies. In regard to the traffic volume forecasts, the PEL Study traffic forecast was developed utilizing the Centre County Regional Travel Demand Model (TDM). This TDM is a trip-based model*

*comprised of links (roadways), nodes (intersections), and zones (development) within the region which incorporates local projected growth (e.g., population and employment). The TDM being used for the State College Area Connector was updated with Streetlight origin/destination travel patterns. Streetlight is a company that provides traffic information that is based upon tracking of location data from cell phones that travel through a selected study area. It should be noted that traffic data collected for the study was obtained while schools (i.e., local primary schools as well as secondary schools) were open. Traffic data obtained and analyzed for this study was based on daily and peak hour traffic volumes and conditions for an average day of the week (e.g., Tuesday, Wednesday, Thursday) during a non-holiday/nonspecial event. While the proposed Build Alternatives would improve event traffic, it would not necessarily address all event traffic needs such as the traffic that occurs on Penn State football weekends. In summary, the PEL Study traffic analysis used to predict future No Build and Build Alternative traffic volumes considers local growth factors, as identified by CCMPO, and is based on local anticipated travel patterns.*

**Growth predictions underlying the Centre Region Comprehensive Plan are being reassessed. See accompanying file (NVECPEL3of3parts.pdf) which is a pdf of a presentation given at this Feb 2023 CRPC meeting:**

“Population Forecasting and the Centre Region Comprehensive Plan - The CRPC received a presentation regarding the role of population forecasting and demographic trends in preparing a multi-municipal Comprehensive Plan. A key element of the Comprehensive Planning process is understanding the existing conditions of the community, including its demographics, as well as understanding how those factors are likely to change over the 20–30-year planning horizon. Growth and demographic trends are crucial to planning for land uses, housing, transportation facilities, and other community infrastructure. While the accuracy of the 2020 Census results have been questioned, with particular concern of an undercount of the student population, regional growth factors during the 2010s did not mimic those of previous decades. After some discussion, there was consensus from the CRPC for staff to create population scenarios based upon different growth factors, which would require additional research and discussion.”

[https://www.crcog.net/vertical/sites/{6AD7E2DC-ECE4-41CD-B8E1-BAC6A6336348}/uploads/February\\_2023\\_CRPC\\_Meeting\\_Summary.pdf](https://www.crcog.net/vertical/sites/{6AD7E2DC-ECE4-41CD-B8E1-BAC6A6336348}/uploads/February_2023_CRPC_Meeting_Summary.pdf)

*NVEC-3 response continued:*

*Minimizing impacts to the natural environment was included in the analysis for identifying corridors to advance for further study. Rothrock State Forest & Stone Mountain Important Bird area, PA Natural Heritage Core Habitat, bat swarming areas, wetlands, and high-quality streams were considered in the analysis. These areas would support ecotourism in the study area. While some of the corridors considered have higher potential impacts in these areas, they are lower for other important resources. Those corridors advanced for further study (US 322-1OEX, US 322-1S, and US 322-5) provide the best overall balance from a traffic, engineering, environmental and planning perspective.*

**In NVEC’s view any 322-5 impacts to “Rothrock State Forest & Stone Mountain Important Bird area, PA Natural Heritage Core Habitat, bat swarming areas, wetlands, and high-quality streams” are disqualifying for 322-5 since at least two other viable alternatives exist: what we have called the Combined Alternative and, as a last resort, the 322-1OEX alternative without the 45/322 connector add-on and interchange.**

**NVEC opposes 322-1s since it is simply a variation of 322-1OEX with much more environmental and farm impacts at the Potters Mills end.**

—————//////////////

NVEC-4: The traffic associated with the Nittany Mini-Casino was not specifically included in the State College Area Connector PEL Study. As mentioned in NVEC-3, the PEL Study traffic forecasts were based on Centre County Regional TDM and updated with localize origin and destination information.

**The investors in the Nittany Mall Mini-Casino are a Who's Who of Centre County developers, landlords, and contractors. The winning license bidder is a former PSU Trustee Chairman. Any misplaced perception on their part that a maximalist 322 four-lane expansion is sorely needed for the Casino may be more important here than the PEL Study forecasts themselves. NVEC maintains that a Combined Alternative could easily meet the Casino traffic volume since that traffic will need to stay within the bounds of the studies that were done in the course of Casino approval anyway.**

*PADOT's NVEC-4 response continued:*

*During the PEL Study, planning studies, ordinances, and other materials were considered when developing the transportation purpose and need, study goals, and conducting the planning analysis. The charters and plans for Ferguson Township and State College Borough were not evaluated at those two municipalities lie outside of the 70 square mile study area evaluated for the State College Area Connector PEL Study. However, assumed traffic demand supported by those municipalities would be included in the Centre County Regional TDM for this study.*

**The Municipal Charter Environmental Bill of Rights of both Ferguson and State College confer atypical authority on those jurisdictions to manage environmentally related issues. To some extent, because of the Council Of Government's (COG) unique "Unit Rule" voting structure, this authority and responsibility can be extended onto the COG itself. PEL Study Area townships Harris and College are an integral part of COG. State College and Ferguson are, along with College and Harris, also integral parts of the regional growth boundary system, the sewer service area, the water authority service area, and the School District. And of course, State College has jurisdiction over Penn State which can also tie into that atypical authority and responsibility to provide enhanced environmental stewardship.**



**NVEC's 501c4 stakeholder status and legal standing in environmental issues is enhanced by these Municipal Charter provisions which empower State College and Ferguson residents through a tie-in with the Environmental Provisions of the Pennsylvania Constitution.**

**Also see our response to NVEC-6.**

*NVEC-4 continued:*

*During the Preliminary Engineering and detailed environmental (NEPA) phase of the transportation development process, environmental field data will be collected and engineering designs advanced. Engineering design will meet current design standards and include stormwater management facilities. Once the design is advanced, environmental impacts will be identified and coordinated with regulatory agencies. Mitigation measures will be developed and agreed upon and included as commitments in the environmental document. These commitments may include replacement of resources such as wetlands, habitat, etc. and installation of noise walls in areas that they are determined warranted, reasonable, and feasible.*

**This does not answer NVEC's contention that the probable environmental damages caused by 322-5 cannot be cost-effectively mitigated. Or won't be. Substantial PEL Study screening of the hydrological and excavation issues should have been done before deciding that 322-5 could be advanced into the NEPA process itself.**

——-//////////

*NVEC-5: At the start of the PEL Study, the identification of transportation problems within the 70 square mile study area was conducted. This identification of transportation challenges resulted in the Study purpose and need which was documented in the Final Purpose and Need for the State College Area Connector Planning and Environmental Linkage (PEL) Study*

*(February 2021). Following the identification of the transportation purpose and need, a range of alternatives was developed. The range of alternatives was then tested through a multi-phased screening process to first determine if they would meet*

*the Study purpose and need and then to identify their environmental and planning impacts, traffic benefits, and engineering costs. Based on the results of the screening process, it was determined that a Build Alternative would be the solution that would meet the purpose and need.*

*Furthermore, it was determined that when balancing the traffic, engineering, environmental, and planning study results, US 322-1OEX, US 322-1S, and US 3225 were the best alternatives to advance for further detailed study.*

*Future studies will include detailed engineering, environmental field investigations, and updated analysis. These results will be shared with the public at future meetings. Mitigation will be developed to address adverse impacts which may include replacement of resources such as wetlands, habitat, etc. and installation of noise walls in areas determined to be warranted, reasonable, and feasible.*

*Improving safety was identified in the needs analysis. The movement of freight via the roadway network was one component of the traffic analysis conducted as part of the PEL Study. Many factors influence freight movement. The PEL Study did not specifically consider rail as a reasonable alternative for the movement of goods or people. Existing rail infrastructure is not located throughout the study area and the installation of such infrastructure is cost prohibitive, would be as impactful as highway options and less beneficial at moving people in a rural area.*

*The State College Area, the destination and origin of, of at least 50% of the car traffic is a relatively compact urban area under the umbrella of the COG regional government. Furthermore the Penn State community which includes the majority of the COG residents is an instrumentality of the Commonwealth.*

**With respect to rail, the above PADOT response illustrates why the piecemeal rejection of each Combined Alternative component is so inimical to a best practices Alternatives Analysis.**

**So in this case intermodal rail could clearly have a role in a Combined Alternative.**

1) convenient freight intermodal rail terminal opportunities abound which could integrate truck and rail container freight along the existing rail corridor which runs from east to west through Harrisburg, Lewistown, Huntington , Altoona, and onto Pittsburgh.

2) with a modest expansion of the Keystone Amtrak Service to Lewistown, or even with an incentivized express bus service for Penn State students from the Harrisburg Station, significant numbers of students could be moved away from private cars. In fact, if building upon the local success of CATA, more would be done to facilitate free student-centered transportation from Harrisburg and other remote transportation hubs, many more students would forgo keeping cars in State College in the first place. There are all sorts of ways to modernize and expand CATA, electric bicycles, and on-demand vans.

And back on the subject of trucks:

Redirecting truck traffic away from 322 at Harrisburg or Altoona is certainly feasible. Incentivizing the use of the Turnpike or Route 80 is certainly doable.

We understand that PADOT may not be able to claim it currently has the authority to manage the Combined Alternative with respect to Turnpike toll relief or to coordinate intermodal rail and the trucking industry. But the authority and incentives can be arranged at the State and regional level. And offsetting hundreds of millions of dollars in highway construction can leverage a lot of innovation which is more consistent with State and Federal climate and energy security goals.

And in this Centre County site specific case, Penn State, the main passenger traffic and economic activity originator is already an “instrumentality of the State.”

————//————

*NVEC-6: The PEL Study data collection (secondary source data with limited field validation) was conducted consistently across the 70 square mile study area. Additionally, the identification of potential impacts was also consistently conducted across the Build Alternative corridors. This includes the methodology for assessing potential engineering and right-of-way costs. During the preliminary engineering and detailed environmental phase of the transportation development process, environmental data will be collected in the field while engineers develop more detailed engineering designs to better identify an impact area. The results of these studies will be analyzed to determine ultimately what alternative would be advanced for final design, rightof-way acquisition, and construction. These results will be shared with the public at future meetings. Mitigation will be developed to address adverse impacts which may include replacement of resources such as wetlands, habitat, etc. and installation of noise walls in areas determined to be warranted, reasonable, and feasible.*

**We maintain that mapping the Study Area onto a 70 sq. mile region that excluded Penn State and State College Borough has contributed to the early shift of focus away from a Combined Alternative approach. The two dimensional map predisposed planners to consider only physical build alternatives which neatly fit within that sort of two dimensional representation.**

**The study area for a Combined Alternative should be set much wider and involve abstract jurisdictional - and not just physical map boundaries.**

————-////////

*NVEC-7: PennDOT, in cooperation with FHWA, conducts transportation studies in accordance with the federal, state, and local regulations and laws. PennDOT works with federal and state regulatory agencies to advance the alternative that best meets the transportation purpose and need while*

*balancing impacts to the natural, cultural, and socio-economic resources. Coordination is also conducted with local municipalities to address their concerns to the extent possible. Real estate speculation is NOT part of the analysis.*

**We appreciate PADOT’s solid “NOT part of the analysis “ with respect to NVEC’s concerns about real estate speculation interests. But we don’t think either NVEC or PADOT should be naive. Tens of millions of dollars are at stake depending on which versions of 322-10ex or 322-5 is chosen.**

**If real estate or road contractor special interests are not working to influence the results, whether directly or through intermediaries, then a question has to be asked about that absence.**

**This is the Fermi paradox question: Where are they?**

————//————

*NVEC-8: PennDOT understands the concern that the community and township officials have raised regarding the PA 45 connector. PennDOT is committed to conducting more detailed traffic analyses to evaluate the US 322 to PA 45 connection.*

*Under any of the Build Alternative scenarios (US 322-10EX, US 322-1S, or US 322-5), should the traffic analyses indicate that a connector is necessary to improve mobility and aid the State College Area Connector project in meeting the defined transportation purpose and need,*

*PennDOT will include the US 322 to PA 45 connection. PennDOT will work with the townships and area residents to minimize impacts to the surrounding community. Additionally, should the associated analysis show that the Build Alternative, with the connector, adversely impacts conditions on PA 45, PennDOT would incorporate necessary improvements into the project.*

*Conversely, if the analyses determines that a US 322 to PA 45 connection is not necessary to improve mobility and aid the State College Area Connector project in meeting the defined transportation purpose and need, the connection will be removed from the project.*

The problem is that the SR 45 to 322 connector (322/45) and its associated Harley Shop area interchange adds considerable farmland impact acreage to 322-1OEX thus potentially unduly influencing the ALCAB to see 322-5 as more farmland protective. So to compare apples to apples in that respect, the 322/45 connector and its interchange should not be regarded as an intrinsic part of the 322-1OEX alternative since it is not an essential part of that alignment anymore than it would be to 322-5 if it were to eventually be justified as an add-on to that as well.

Analyzing things a little deeper, the ALCAB could see that the 322/45 connector and its interchange greatly increases the chance of farmland conversion to high density commercial for much of the surrounding fields. This would not be the case if limited access 322-1OEX were built without the 322/45 connector and interchange. On the contrary, generous compensation received by active farmers only losing land at the edges of their properties will enable them to make capital investments to upgrade the agricultural value of their remaining land, and empower them to pursue other land use income opportunities not incompatible with preservation of most of the farmland context.

Any argument which could support the 322/45 connector interchange for 322-1OEX will also apply to 322-5 once old 322 is converted to a business route.

So removing the recently proposed 322/45 connector and interchange from 322-1OEX is critical for farmland preservation and the management of future SR45 traffic growth.

It is because NVEC is a strong advocate of local farmland preservation, that we adamantly oppose the misuse of farmland protection programs to enable real estate speculators to quietly

manipulate the planning process so as to promote taxpayer built infrastructure which would eventually enable an equitable investor, through litigation or politics, to have farmland rezoned high density commercial.

-----/////

**While NVEC incorporates by reference our previous Nov 2022 comments, we duplicate them here for more convenient PEL Study and NEPA review with a few updates marked in bold italics.**

*NVEC inserts here for the PEL study record a link to this in depth study by advanced Landscape Architecture students at Penn State: [https://centrehistory.org/wp-content/uploads/2023/02/Rethinking-322\\_Booklet.pdf](https://centrehistory.org/wp-content/uploads/2023/02/Rethinking-322_Booklet.pdf)*

#### Intervention Request

NVEC is a 501c4 with members directly impacted by the proposed 322 expansion. Our bylaws specifically require us to work to protect the environment. We are especially committed to applying the environmental provisions of the Pennsylvania Constitution as it interacts with municipal charters and ordinances.

In order to exercise our due diligence and preserve NVEC due process options under all applicable administrative law procedures:

NVEC formally requests to intervene in this PADOT alternatives analysis process *and its subsequent NEPA environmental impact study.*

If it is too early to formally request this, we request that NVEC and the public be notified of the intervention deadline and the required method for such an intervention request as soon as that deadline date is established.

***NVEC understands that it is PADOT's position that a PEL Study determination is not a final agency action and thus is not subject to the opportunity for immediate court review. That is also NVEC's understanding at this time of how PEL leads into the NEPA EIS process.***

***If this is in error, and if PADOT does regard the outcome of the PEL Study as a final agency action, we maintain that NVEC and the public should be notified of the fact that the clock is ticking for any opportunity for formal intervention before EPA, FHWA, or even a Court.***

Thank you.

#### Filed Comments

As we argued in our April 2022 comments, a minimum build/Demand- Side Management/ Transportation Systems Management/Intermodal approach is far preferable under all the applicable criteria. These advantages include up to a 1/2 billion dollars savings which could be applied to deteriorating bridge, road, and intermodal infrastructure in less affluent regions of Pennsylvania.

In general, the Nittany Valley Environmental Coalition (NVEC) still favors a minimum build/Demand-Side /Intermodal/Traffic Management solution addressing genuine existing Route 322 safety concerns as confirmed by unbiased data-driven analysis and traffic growth projections consistent with our region's Council of Government (COG) Climate Action and Adaption Plan.



That said, for environmental, procedural, and cost-benefit reasons, NVEC asserts that 322-5 is an invalid and especially unacceptable alternative.

General Arguments in favor of a minimum build/Demand-Side Management/Transportation Systems Management/Intermodal approach

Peak visitor and commuter passenger traffic demand on the 322 corridor is functionally under the control of another Pennsylvania State entity: Penn State University (PSU). Under any objective NEPA Alternatives Analysis, FHWA/PADOT can (and must) first rely on PSU's complete cooperation in Demand-Side traffic solutions before resorting to costly build solutions that unnecessarily impact the natural or human environment.

In fact, central to the PSU area's "business model" - as consistently expressed in multiple official documents - is Penn State's aspiration to be recognized as a global leader and example of sustainability and ecological stewardship.

The environmental and neighborhood quality of life here in Centre County is also key to Penn State's future competitiveness as an in-person school, given the context of ever-increasing remote education alternatives.

Any Route 322, 144, or 45 connection improvements should be calibrated in light of the actual residential population growth projections as set forth in the various county, municipal, and University planning documents. Probable and actual government-mandated technological advances must be considered as well, such as electric and autonomous vehicles.

In particular, if technological changes in both transportation and remote education are taken into account, one or two added lanes on, or close to, the current Route 322 alignment should be more than sufficient for the next 50 years.

Potential tourism is particularly responsive to traffic systems management because of time of day, season, and other factors. For instance, even under the most optimistic tourist-boosting scenario, it is anticipated that the primary tourism draw for Centre County - other than Penn State activities and

associated youth sports - will be state forest ecotourism and farm based visitor business.

A massive all-purpose Route 322 expansion promoting sprawl development is incompatible with these sorts of tourist activities.

The 322-5 is especially incompatible because of aesthetic as well as environmental factors which are, in this instance, inextricably intertwined.

Due to well-mobilized public opposition and ongoing litigation by a rival gaming corporation who intends to locate the casino in another part of the state, it is invalid to include the Pennsylvania Gaming Control Board Nittany Mini-Casino traffic as part of the rationale for a 322 expansion. Since any Nittany Casino would also operate under the State Gaming Commission, Demand-Side Management and the use of intermodal tactics could be implemented there as well.

In any event, the traffic studies officially associated with the proposed Nittany Casino show no impact beyond that already factored in under a full retail mall occupancy scenario.

“Build it and they will come” economic development arguments are not legally defensible here in Centre County. There is plenty of need elsewhere in PA in places where highway and bridge construction funds are lacking, and where Transportation Systems Management and minimum build alternatives are not feasible because of a lack of public support.

In addition, two Council of Governments Home Rule (COG) municipalities - Ferguson Township and State College Borough (which contain most of Penn State) - have environmental provisions that were added by referendum to their municipal Charters. These provisions require, in our view, prioritization of Transportation Systems Management alternatives, intermodal approaches, and Demand-Side Management. These priorities should include facilitating Penn State and other government entity cooperation. One major area of cooperation between these two municipalities and Penn State is bicycle accessibility.

In any event, if an oversized 322 expansion is built despite our objections, then ample mitigation is required. Sound barriers, wetland offsets, forest replacement and advanced storm water management are, in our view, required by NEPA, at least two municipal charters, and the environmental provisions of the Pennsylvania Constitution.

However, since many of its environmental impacts cannot be cost-effectively mitigated, the 322-5 alternative is an unacceptable and invalid alternative.

#### Summary

A traditional full four-lane limited access highway is not needed. It is not justified under any fair NEPA Alternatives Analysis, as we have said, since the commuter and peak passenger traffic flows are functionally under the control of another State entity which is more than competent enough to implement solutions to optimize environmental protection and passenger car safety while minimizing peak time congestion.

That said, it is also true that the safety and air quality impacts of the interspersed long range truck traffic in this area needs to be managed more directly by the relevant State and Federal authorities.

There are opportunities to facilitate safer highway interconnections to Route 80, for instance, well before the heavy trucks reach Centre County. Longer-term, under the authority of a statewide Transportation Systems or Demand-Side Management approach triggered by this 322 bottleneck, a considerable investment in intermodal rail is feasible and cost-effective as well.

#### Specific NVEC Comments on the 3 PADOT recommended connector routes:

1. The matrix grid in the alternatives analysis overstates the environmental impact of 322-OEX and 322-s-1, while understating the impact of 322-5. This is probably an artifact of the formulaic application of abstract categories and criteria without comprehensive direct observations on the ground.
2. The costs of environmental and even aesthetic mitigation under 322-5 are harder to quantify since the impacts are of greater regional and state level

concern. Litigation and delays are unpredictable. In any event, even when not accounting for the additional mitigation and construction delays that 322-5 will entail, the alternatives matrix still shows 322-5 to be considerably more expensive. If the interchange and its new connector road to Route 45 proposed for 322-OEX and 322-s-1 is eliminated then the cost savings of going with either of those alternatives is even greater. PADOT officials have already told members of the public that removing this interchange is feasible.

3. The costs of the property taken under 322-OEX and 322-s-1 can be generously compensated. Litigation about such eminent domain matters is straightforward and will not cause delays.

4. The behind-the-scenes lobbying of real estate speculators, *potential road construction contractors*, or so-called political actors attempting to skew the alignment and interchanges to favor special interests is illegitimate. Consideration of such factors is not allowed under NEPA, other environmental regulations, the charters of at least two local municipalities, and the Pennsylvania Constitution.

5. We find the proposed new interchange and its associated new connector road to route 45 to be unnecessary and unwarranted.

Thank you.

Dorothy Blair, President NVEC  
on behalf of the  
Nittany Valley Environmental Coalition (NVEC) 501c4.

David Stone NVEC and pro se  
March 19, 2023

*We incorporate by reference NVEC's April 2022 and November 2022 comments as submitted to PADOT.*

**Commenter:** NVEC

**Response:**

Section 1 of 2: PennDOT has evaluated numerous transportation alternatives to address the purpose and need identified for this area as part of the PEL Study. Alternatives considered included the Transportation Control Measures (TCM), Transportation Systems Management (TSM), Transit, No-Build, Build, and Upgrade Existing. PennDOT appreciates the NVEC opinion that the combination of TCM, TSM, and Transit measures would provide improvements to the existing roadway network. However, PennDOT, the lead state agency, in consultation with Federal Highway Administration (FHWA), the lead federal agency, have evaluated these alternatives and determined that based upon the traffic volumes that exist and are anticipated as well as safety needs of this area, these alternatives do not meet the purpose and need of the project. The PEL Study does state that components of the TCM, TSM, and transit alternatives may be further considered to enhance the alternatives advanced for future study (Build Alternatives US 322-1S, US 322-1OEX, and US 322-5). This would be determined as the State College Area Connector advanced into detailed engineering and environmental study.

Equally, PennDOT acknowledges the importance of avoiding and minimizing the environmental impacts associated with all alternatives and is committed to further this evaluation as the project advances into the National Environmental Policy Act (NEPA) phase. Detailed environmental study efforts and engineering design will advance in the NEPA phase to assist in the further development of avoidance and minimization measures for alternatives that are advanced. PennDOT will continue to coordinate the study results and anticipated impacts with FHWA, the Cooperating and Participating Agencies, and the public. With a project area that contains such a diversity of natural, cultural, and socioeconomic resources, complete avoidance of impacts is not feasible, but by working in conjunction with the regulatory agencies, local officials, and the public, it is PennDOT's goal to identify the best balance of developing a transportation improvement alternative that fulfills the purpose and need while avoiding and minimizing impacts to the extent practicable.

Section 2 of 2: Thank you for your responses to the previously provided comment responses in the *October 2022 Open House Public Meeting Summary Report for the State College Area Connector Planning and Environmental Linkages (PEL) Study*. The Centre Region Comprehensive Plan Update Population Forecasts provided and referenced in Section 2 of 2 comments has been saved to the project file.

**Commenter:** No 45 Connector Movement and Hidden Lake Owner's Association

No 45 Connector Movement and Hidden Lake Owner's Association  
Hidden Lake Dr  
Centre Hall, PA 16828  
March 16, 2023

To: Mr. Dean Ball  
Penn DOT District 2-0  
70 PennDOT Drive  
Clearfield, PA 16830

Dear Mr. Dean Ball,

We are submitting this letter for the public SCAC PEL Report comment period in advance of the March 19, 2022 submission date to be included in the public record.

We continue to oppose a PA-45 Connector Road.

I am sending this letter on behalf of the residents in western Potter Township and the No 45 Connector movement, which continues to have hundreds of petitioners who oppose adding a new connector road between PA-45 and the proposed US 322 primarily on the grounds of safety.

In Section 2.3.1, the PEL report continues to use 5-year old data from 2014 – 2018. This continues to show PA-45 as the most dangerous road in the study area. The more recent 5-year data (2018-2022) shows an increase in PA-45 fatalities while continuing to be the most dangerous road in the study area but with the highest fatality rate in the study area. Furthermore, the report continues to ignore separating the segments to the west and east of the proposed 45 connector. 100% of the PA-45 fatalities in the last 5 years were on the Potter Township side to the East of the proposed 45 connector road. This underscores that more access via a PA-45 connector road would only worsen the fatality rate in Potter Township.

Section 2.3.2 highlights that the area where the 45 connector road would connect is substandard today. This was shown much more obviously in the Purpose and Need study. The analysis of predicted crash increases does not account for a connector road increasing traffic in Potter Township. This stretch of road is not separated for analysis. We continue to assert that the 45 connector road was added without due diligence, analysis, and potential alternatives. This lack of study will make the most dangerous section of road in the study area even more dangerous. We assert that the PA-45 connector road should be removed from the project.

HLOA-1

March 16, 2023

The following photo shows damage from a box-truck that flipped over and skidded on its side across the lanes of traffic within a quarter mile of the proposed PA-45 connector road. This is an area that the Purpose and Need study showed was substandard. This further underscores that improving PA-45 should be a priority over adding access.



HLOA-2

Section 2.4.1 omits the PA-45 segment for traffic volumes where the 45 connector would connect (between Elks Club Road and Williams Road). This continues to show a lack of analysis regarding the connector road. This is an area that included long stretches that did not meet standards in the Purpose and Need study.

Section 2.4.3 "Level of Service", underscores that PA-45 in Potter township is substandard today and adding additional access will only worsen the situation even if it offloads other areas. We continue to believe the solution to improve PA-45 is through measures that add turning lanes, rumble strips, traffic signal(s) in Boalsburg, speed limit adjustments, improved intersection sightlines (ex: Hidden Lake intersection sightlines are substandard), and consider bike lanes for multi-mode transit. Neighbors in the Willowbrook neighborhood thought the traffic patterns were much better at rush hour when a temporary traffic light was placed on PA-45 a few years ago.

HLOA-1

Section 3.1 states that the Penns Valley Regional Comprehensive Plan designates PA-45 as a scenic byway. In this capacity bikers are often seen on this road along with oversized farm equipment. In this capacity a PA-45 connector road would add pressure to rezone and negatively impact the vision for the community with unwanted commercial growth. This is highlighted by the quote from the Penns Valley

HLOA-2

March 16, 2023

Regional Comprehensive Plan, which states: *“local officials would strongly object to the construction of an interchange within the region as it could produce and inducement to large-scale development that would conflict with the Region’s overall community development objectives”.*

HLOA-2

Section 3.2 highlights that PA-45 total crashes, hit-fixed-object crashes, and angle crashes (leading to more severe crashes) have increased and are due to travel speeds, substandard roadway elements, and uncontrolled access points. This correlates with the most recent crash data (2018-2022) from PennDOT, which shows higher fatality rates on PA-45. Unfortunately, this updated data is not included in the PEL report. It also underscores the need to improve PA-45 rather than providing yet another uncontrolled access point through a connector road where severe angle crashes can occur.

HLOA-1

Section 3.3 highlights multi-mode transportation. PA-45 in Potter township has a significant amount of Amish horse-and-buggy traffic along with oversized farm equipment usage that compete with the truck, bicycle, and passenger traffic. This further highlights the need to improve/widen PA-45 rather than simply add more access/traffic via a PA-45 connector road. I’ve attached a photo of oversized farm equipment on PA-45 in Potter township from October 2022. It doesn’t even fit on the road with the berm.



This fall, I witnessed a near head-on collision of an oversized truck with another semi-truck on PA-45 in Potter Township over a narrow bridge. These risks are real and will be worsened by a 45 connector road.

HLOA-1



March 16, 2023

Section 4.1 highlights the substandard issues on PA-45 between Elks Club Road and PA-144, where a 45 connector road would be placed. Increasing access will only serve to worsen conditions on PA-45.

HLOA-1

From Section 2.3.3 of the Engineer Technical Memo, it states that the connector road was included since Sharer, Wagner, and Tusseyville roads were narrow, winding, and in some instances unpaved. Yet Sharer is a shorter pre-existing straight-line road that could be updated rather than taking farm-land, residential-land, and constructing a brand new roadway. No evidence is provided to the relative costs, land acquisition, or impacts to these alternatives. These alternatives seem to be dismissed without proper analysis provided to the public during the PEL study stage. Common sense would indicate lower costs and impacts for updating an existing straight-line road over a new road over hilly terrain to a segment of PA-45 that is considered substandard today. Additionally, it appears that the footprint of an intersection near Sharer road would take less (and unprotected) farmland. With all this in mind, the safety analysis, costs, and impacts of adding access to various locations along PA-45 continues to be omitted.

HLOA-3

In summary, we strongly recommend removing the PA-45 connector road. As Potter Township supervisor, Dick Decker, stated in a letter to PennDOT on Oct 18, 2022, it does not serve Potter Township. We don't believe it was properly analyzed for alternatives based on the lack of evidence nor was evidence provided to support its existence. The safety evidence clearly shows that it would endanger motorists on PA-45 in Potter Township. It will provide additional access to the most dangerous segment of road (PA-45 in Potter Township). We and our petitioners continue to urge you to remove the PA-45 connector road from the study.

HLOA-1

Sincerely,

Patrick MacFarlane  
Vice President, Hidden Lake Owner's Association  
Member of the No 45 Connector Movement

COPY: Potter Township, Harris Township, Centre County MPO

**Commenter:** No 45 Connector Movement and Hidden Lake Owner's Association

**Response:**

HLOA-1: PennDOT understands the concerns of the community regarding the PA 45 connector. PennDOT is committed to conducting more detailed traffic analyses to evaluate the US 322 to PA 45 connection with current traffic and crash data. Under any of the Build Alternative scenarios (US 322-1OEX, US 322-1S, or US 322-5), should the traffic analyses indicate that a connector is necessary to improve mobility and aid the State College Area Connector project in meeting the defined transportation purpose and need, PennDOT will include the US 322 to PA 45 connection. PennDOT will work with Potter Township and area residents to minimize impacts to the surrounding community. Additionally, should the associated analysis show that the Build Alternative, with the connector, adversely impact conditions on PA 45, PennDOT would incorporate necessary improvements into the project. Conversely, if the analyses determines that a US 322 to PA 45 connection is not necessary to improve mobility and aid the State College Area Connector project in meeting the defined transportation purpose and need, the connection will be removed from the project. In summary, further traffic analysis will be conducted during the preliminary engineering and detailed environmental phase of the transportation project development.

While the Draft PEL Study report provided an overview of the traffic volumes for the roadways, PennDOT did evaluate the traffic volumes for various segments along the roadways in the *Traffic Analysis Technical Memorandum for the State College Area Connector Planning and Environmental Linkage*. Table 11 provides the traffic volume summaries predicted for Year 2050 in the build and no build scenarios and includes consideration of traffic east and west of the potential PA 45 connector road. According to the table, the projected Year 2050 traffic volumes on PA 45 to the east of the Connector Road are 9,200 total vehicles per day (1,100 trucks per day) for no build conditions and 9,300 total vehicles per day (1,450 trucks per day) for build conditions. West of the Connector Road, the table shows Year 2050 traffic projections on PA 45 of 9,200 total vehicles per day (1,100 trucks per day) for no build conditions and 2,400 vehicles per day (350 trucks per day) for build conditions. As the project progresses through the typical study/design process, and engineering details are refined including local roadway access and connections, traffic volume projections will also be refined, and traffic analyses will be updated accordingly.

Relative to safety, PennDOT conducted a Highway Safety Manual (HSM) analysis which considers crash experience, roadway inventory, and traffic volume data to provide estimates on an existing or proposed roadway's expected safety performance. The PEL Study safety analyses were performed in accordance with HSM methodology, including analysis of intersections and roadway segments. The roadways studied (US 322, PA 45, PA 144, new alignment roadway and PA 45 Connector Road) were segmented appropriately for existing and no build conditions, as well as for build conditions, which included additional intersections and segments on PA 45 and existing US 322 (that will remain as a local road under build conditions) for new intersections with the Connector Road. The analysis identified that PA 45 would have a potential 20% increase in predicted crash frequency in Year 2050 no build scenario. While the Draft PEL Study reports the roadway as a single segment, the analysis is based on smaller segments and intersections which are included in Appendix D of the *Traffic Analysis Technical Memorandum for the State College Area Connector Planning and Environmental Linkages*.

As you noted, the *Final Purpose and Need for the State College Area Connector Planning and Environmental Linkage* discussed existing roadway deficiencies. Chapter 8 of the Draft PEL Study

report stated that, “Although geometric elements which do not meet current design criteria do not necessarily indicate unsafe conditions, a full safety analysis including an evaluation to determine possible correlations between crash history and geometric conditions could be conducted as an independent stand-alone project. This potential safety study along PA 45 could also be expanded to evaluate the need for other improvements involving other design elements such as shoulder widths, intersection geometry, sight distance, pedestrian/bicycle accommodations, and access management.” The Draft PEL Study report recommends a PA 45 safety study independent of the State College Area Connector to determine what safety improvements may be needed along PA 45, including the three identified intersections (Linden Hall Road, Willowbrook Drive/Rockey Ridge Road, and Cedar Run Road). Additionally, the Draft PEL Study also states that “...any study area roadway substantially impacted as a result of a Build Alternative would be addressed as part of the Build Alternative for the future State College Area Connector project.

The detailed analysis in the Draft PEL Study report supported the engineering and identification of recommendations for alternatives to advance for further study.

HLOA-2: Thank you for your comment. We acknowledge your concern.

HLOA-3: The PA 45 connector road was initially located to provide a direct link from PA 45 to the new expressway while limiting impacts to farmlands designated as Agricultural Security Areas or with conservation easements. The connector road location also directly aligns with the proposed interchange location on the new expressway near the Harley Davidson facility, which was also located to minimize agricultural impacts. While Sharer Road could be reconstructed to correct width, grade, and sight distance deficiencies and serve as a connector road between PA 45 and US 322, it is located more than a mile west of the proposed interchange. Positioned at this location, it is unlikely that it would draw significant eastbound traffic, or any westbound traffic, to the new interchange. Similarly, Wagner Road would need to be substantially upgraded to correct deficient geometric conditions. While this could certainly be done and portions of the existing Wagner Road right of way reused, the entire disturbed area associated with these improvements falls within existing Agricultural Security Areas (ASAs). ASAs are tracts of agricultural land that have been officially designated as an agricultural district by the local municipality. ASAs are intended as a tool for protecting farmland from non-agricultural uses and qualifies land for consideration under the farmland preservation program (such as Agricultural Conservation Easements). The proposed connector road as currently indicated was placed just outside of the Agricultural Security Area boundary.

As the preliminary engineering advances and should the traffic analysis confirm that the connector road is necessary to meet the transportation purpose and need, the specific alignment and placement of the connector road may be modified to maximize effectiveness and further minimize impacts. In addition, further traffic and engineering studies on PA 45 will be performed as the project advances. Should additional safety or capacity improvements to PA 45 be warranted due to the change in traffic volumes or patterns, these improvements will be included within the State College Area Connector project.

Commenter: Parks, Nancy

**From:** Nancy F Parks <[REDACTED]>  
**Sent:** Saturday, March 18, 2023 5:01 AM  
**To:** Ball, Dean D <deball@pa.gov>  
**Subject:** [External] Comments Rt 322 and Rt 45 expansions

**ATTENTION:** This email message is from an external sender. Do not open links or attachments from unknown senders. To report suspicious email, use the [Report Phishing button in Outlook](#).

I urge PennDOT to reconsider their disastrous proposals for expansion of Rt 322 and a completely unnecessary new road from Rt322 to Rt 45. I urge PennDOT to reconsider its faulty assumptions of its primary mission. In order to serve PA, PennDOT must commit to Moving people and not vehicles. You should scrap these proposals and begin cooperation with local municipalities to increase public transit and still maintain the historic, primary agriculture and rural residential values that our residents have told you that we are committed to preserving.

NP-1

- No Build Rt 322 is only alternative plus No build of a Rt 45 Connector.

NP-2

- Fix the current problems on Rt 322, Rt 144 and Rt 45 using measures to slow down traffic [weight restrictions, traffic signals, speed limits etc], using dedicated right side passing lanes where appropriate, turning lanes, overpasses and underpasses for movement of agricultural equipment and wildlife corridors.

NP-3

- Require that these restrictions be enforced.
- 

NP-4

- PennDOT is creating more problems than it is solving. Increasing lanes of vehicle traffic will ignite "induced demand" and accelerate traffic usage.

NP-5

<ul style="list-style-type: none"><li>• See my previous formal technical comments;</li></ul>	NP-6
<ul style="list-style-type: none"><li>• Our existing communities support a more rural way of life with attention to historic preservation. We will not accommodate any individuals' or corporation's desires to line their own pockets by accessing our rural landscape for their own ends. I would never sacrifice our agriculture production - so sorely needed for our future needs to feed our population - for increases in Penn State football traffic;</li></ul>	NP-7
<ul style="list-style-type: none"><li>•</li><li>• At no time should PennDOT consider any connector between Rt 322 and Rt 45;</li></ul>	NP-8
<ul style="list-style-type: none"><li>• At no time should PennDOT consider routing traffic through farms or preserved lands and soils or state protected lands.</li></ul>	NP-9
<ul style="list-style-type: none"><li>•</li><li>• EXTEND THE COMMENT PERIOD BY AT LEAST ANOTHER 30 DAYS BUT PREFERABLY 60 DAYS</li></ul>	NP-10

—  
| Nancy F. Parks

### Comment Response:

NP-1: PennDOT and the Federal Highway Administration (FHWA) initiated the State College Area Connector PEL Study to identify and assess transportation challenges within the study area to provide a foundation for the development and evaluation of a range of alternatives. Through an analysis of the existing infrastructure's inability to effectively serve the existing and projected movement of people and goods, a purpose and need statement was developed to define the direct transportation-related needs within the study area. The transportation needs are: existing roadway configurations and traffic conditions contribute to safety concerns; high peak hour traffic volumes cause congestion and result in unacceptable Level of Service (LOS) (LOS D [rural only], E, or F) on US 322, PA 45 and PA 144 roadways and intersections within the study area; and, the roadway network configuration in the study area lacks continuity and does not meet driver expectations. Through the alternatives screening process, it was determined that alternatives (e.g., transit only or bicycle and pedestrian improvements) that do not address the movement of both personal automobiles and freight trucks would not meet the transportation needs in the area. Essentially, the alternatives screening determined that three Build Alternatives (US 322-1OEX, US 322-1S, and US 322-5) would best meet the identified needs while minimizing potential impacts to the natural and built environment.

NP-2: Based on the PEL Study purpose and need discussed in NP-1, the No Build Alternative would not address the future transportation needs.

NP-3: PennDOT utilizes various traffic calming measures throughout the Commonwealth. These types of measures were considered under the Transportation Systems Management (TSM) Alternative for this study. Through the screening process, it was determined that TSM solutions alone would not meet the identified transportation purpose and need of the PEL Study. Additionally, PennDOT cannot install weight restrictions or traffic signals without technical justification. The other measures indicated will not provide sufficient capacity on the existing network to address the purpose and need identified based on the design year 2050 traffic volume projections.

NP-4: Speed enforcement is always a concern when considering the safety of the traveling public, however it is not under PennDOT's purview and specific concern areas should be addressed with state and local law enforcement.

NP-5: According to research published by the Transportation Research Board (TRB) and the Journal of Transport and Land Use, "latent demand" and "induced demand" are two concepts in transportation planning that describe different aspects of travel behavior and its relationship with infrastructure and services.

Latent demand refers to the existing or potential travel demand currently unmet or underserved due to various reasons such as lack of infrastructure, limited services, or other constraints. Induced demand refers to the phenomenon where the expansion or improvement of transportation infrastructure or services leads to an increase in travel demand beyond what was initially anticipated. This increase in demand is often attributed to factors such as reduced travel time, improved accessibility, or enhanced convenience resulting from the new infrastructure or services.

The phenomenon of latent/induced demand occurs with transportation improvement projects when a bottleneck is removed, capacity/throughput is increased and a faster route results in a shifting of traffic to the faster route.

These dynamics are taken into account as part of the travel demand/traffic forecasting process with the use of the Centre County Regional Travel Demand Model (CCRTDM). Future traffic volumes generated by a travel demand model are based on the existing roadway network with future planned/programmed transportation improvements as well as existing development and anticipated future development, through coordination with the county and local municipalities (cities, boroughs, and townships) within the surrounding region. Thus, the use of a travel demand model in the traffic forecasting process helps designers better predict the change in travel patterns/volumes that are anticipated to occur with a regional transportation improvement project such as the State College Area Connector. The goal of the State College Area Connector project is to shift modeled traffic volumes from the local roadway network to the Build Alternative to improve safety and provide an efficient way for traffic to move through the area rather than have traffic impact the local roadway network (No Build Alternative).

NP-6: Previous comments provided have been addressed in the corresponding public comment summary documents.

NP-7: While a transportation project is not able to fully avoid impacts to all resources, PennDOT has worked to avoid and minimize impacts associated with the various alternatives throughout the PEL Study. As the project progresses into the preliminary engineering and environmental studies (National Environmental Policy Act [NEPA]) phase of the project, detailed studies to identify natural, cultural, and social resources will be conducted and the preliminary engineering of the Build Alternatives corridor locations will be refined in an effort to further avoid and minimize impacts to these valuable and protected resources to the extent practicable.

NP-8: PennDOT understands the concerns regarding the PA 45 connector. PennDOT is committed to conducting more detailed traffic analyses to evaluate the US 322 to PA 45 connection. Under any of the Build Alternative scenarios (US 322-1OEX, US 322-1S, or US 322-5), should the traffic analyses indicate that a connector is necessary to improve mobility and aid the State College Area Connector project in meeting the defined transportation purpose and need, PennDOT will include the US 322 to PA 45 connection. PennDOT will work with the townships and area residents to minimize impacts to the surrounding community. Additionally, should the associated analysis show that the Build Alternative, with the connector, adversely impacts conditions on PA 45, PennDOT would incorporate necessary improvements into the project. Conversely, if the analyses determines that a US 322 to PA 45 connection is not necessary to improve mobility and aid the State College Area Connector project in meeting the defined transportation purpose and need, the connection will be removed from the project.

NP-9: Agricultural properties and other protected lands will be avoided to the extent practicable.

NP-10: The 30-day comment period was determined sufficient for a document of this size and agreed upon by FHWA. A time extension for the PEL Study comment period will not occur.

**Commenter:** Pennsylvania Farm Bureau

## Pennsylvania Farm Bureau

510 S. 31st Street, P.O. Box 8736 | Camp Hill, PA 17001-8736 | 717.761.2740 | www.pfb.com

March 19, 2023

Dean Ball, PE  
PennDOT District 2-0  
70 PennDOT Drive  
Clearfield, PA 16830

Dear Mr. Ball:

Pennsylvania Farm Bureau (PFB) is pleased to offer its comments on the draft Planning and Environmental Linkages (PEL) study of the State College Area Connector (SCAC), specifically as it relates to the SCAC's potential effects on agricultural land within the proposed study area. PFB is the Commonwealth's largest general farm organization, representing over 30,000 members engaged in all manner of agricultural activities, including the production and processing of crops; the production and processing of animals; the production and processing of forestry products; landscaping and horticultural services; agriculture-related support services; and food manufacturing.

A reliable, efficient, and affordable transportation system is critical to Pennsylvania agriculture, and indeed to the Commonwealth's overall economy. The SCAC has the potential to provide tremendous improvement in each of those areas for the greater State College/Centre County region. At the same time, there are several concerns we believe must be addressed to protect agricultural operations (and more specifically, prime farmland) in the area as the project progresses, while recognizing the multiple, often competing factors that must be evaluated.

PFB-1

Specifically in reference to the immediately preceding, PFB is concerned about how the environmental impacts identified during the study process are tabulated and weighted. During the October 2022 Open House Public Meeting on the project, PennDOT staff response was that these resources were each identified independently, and that weighting would occur during a balancing in the subsequent National Environmental Policy Act (NEPA) review. PFB's concern is that, in observing the project maps, some areas were counted both as wetlands and as agricultural land. It is critical to know how each of those resources are weighted in such a case (especially considering the possibility of double counting). We will continue to engage with elected officials and agency staff on this point as the process moves forward.

PFB-2

On a related note, for PFB and its farmer members so impacted by the proposed (remaining) three routing proposals, a shift of the project off their prime farmland onto marginal land that is often wet would preserve more of their farms. PFB raised this issue at the aforementioned October 2022 meeting, asking how such a shift could occur and whether it was possible for compensating wetlands to be built elsewhere. This has been done during other highway construction projects, such as the I-99 initiative. The response we received indicated that such evaluation would happen during the subsequent NEPA review. PFB has a strong interest in participating in any such evaluation, in order to promote and expand options that protect prime farmland while mitigating impacts that must occur elsewhere.

PFB-3

Finally, PFB continues to have concerns about the potential use of eminent domain as part of the SCAC project. PFB supports strengthening the highway condemnation standard for land in an agricultural security area and for active farmland, as well as eliminating the condemnation exception for activities relating to existing highways.

PFB-4



## Pennsylvania Farm Bureau

510 S. 31st Street, P.O. Box 8736 | Camp Hill, PA 17001-8736 | 717.761.2740 | www.pfb.com

Given the significant impact possible in the study corridor, as well as the influence of this project on similar undertakings elsewhere in Pennsylvania, PFB urges officials to focus their attention on alternatives that minimize this course of action. For example, PFB has been made aware that there are landowners proximate to the proposed project area that are interested in selling their property. Such alternatives should be considered early in the evaluation of proposed routings.

PFB-5

On behalf of PFB and its members, I thank you for this opportunity to provide comments on this important project. Our members will remain actively engaged in the process and continue to educate elected officials, agency personnel, other stakeholders, and the general public about the benefits of Pennsylvania agriculture and its reliance on a strong, smoothly functioning transportation network that protects prime agricultural land.

Sincerely,



Grant R. Gulibon  
Regulatory Affairs Specialist

### Response:

PFB-1: Thank you for your comment.

PFB-2: Build Alternative corridor impacts were all calculated in the same manner. Based on the secondary source data contained in the GIS files (found on the study web map), the various resources were counted and included as potential impacts, if they were located within the corridor boundaries. As you noted, there are some instances where resources do overlap (e.g., wetlands over productive agricultural lands or agricultural security areas over agricultural easement etc.). The results of this initial analysis are in Table 6-3 of the Draft PEL Study report which presents all the impacts calculated. Table 6-4 of the Draft PEL Study report provides a summary of the regulatory resource topic impacts. For purposes of this PEL Study, if an alternative recorded a higher-than-average impact in one of the resource categories, that alternative was said to have an issue related to that resource category. The US 322-1OEX, US 322-1S, and the US 322-5 Build Alternative corridors were the environmentally recommended corridors as they had lower than average potential impacts for three of the five regulatory resource categories. Your concerns regarding resource importance and weighing of potential impacts are welcome as the project progresses.

PFB-3: Shifting of specific alternative alignments to avoid sensitive resources will occur, as you indicated, during the preliminary engineering and environmental studies (National Environmental Policy Act [NEPA]) phase. The extent of the shifts is not currently known. However, the NEPA study area as defined in the Draft PEL Study report extends approximately 500' beyond the current corridors to allow for shifting. In addition, the future alternative alignments could also include bridges to avoid resources such as wetlands or provide access to farm parcels. As the

studies advance, PennDOT will present the preliminary findings to the federal, state, and local resource agencies, as well as interested stakeholders, and the public for comment. The process for public and agency outreach will be consistent with the process completed during the PEL Study.

PFB-4: PennDOT complies with Pennsylvania Act 1979-100 which established the Agricultural Lands Condemnation Approval Board (ALCAB). ALCAB is an independent administrative board with approval authority over the condemnation of land being used as Productive Agricultural Land (PAL) for transportation projects. PennDOT cannot acquire right-of-way to productive agricultural land or Prime agricultural land unless the ALCAB gives approval, or the landowner amicably agrees to the conversion to transportation use.

PFB-5: PennDOT recognizes the importance of farmland in the study area and that the extent of the PAL and the viability of the farm operations/businesses are not only major contributors to the local economy but also contribute to the cohesion of the rural community and the historic heritage of the study area. Given the extent of farmland in the study area, it is not possible for a major transportation improvement project to avoid all potential impacts. However, PennDOT will make every effort to minimize impacts to these resources. To fully understand the farm operations in the area and how to best minimize potential impacts, PennDOT anticipates that a Farmland Assessment Report will be prepared during the detailed studies conducted in the NEPA phase of the project development. Preparation of the report requires extensive interviews with all potentially impacted farm operators to identify and document the nature, features, and extent of their operations, including all farm-related structures, existing access and pathways, and other resources of the farm operation. Interviews with farm operators and landowners will also identify any leased properties required for the successful operation of potentially affected farm operations. The report will also document the potential avoidance and minimization measures considered and the assessment of potential impacts to the viability of individual operations.

In reference to your comment about certain landowners "...interested in selling their property. Such alternatives should be considered early in the evaluation of proposed routings.", PennDOT develops and evaluates potential alternatives based on their ability to meet the identified purpose and need while minimizing overall impacts to the natural, cultural, and socio-economic resources which includes farmlands. PennDOT does not discuss or consider individual parcels relative right-of-way acquisition until the NEPA process is complete to avoid bias in the alternative development and evaluation.

Commenter: Saidis, Robert

ROBERT C. SAIDIS  
SEAN M. SHULTZ  
CHRISTOPHER E. FISHER  
TODD F. TRUNTZ  
KENNETH W. LEE

*Paralegals*  
Dolly M. Hoekenberry  
Renee L. Murray

**SAIDIS, SHULTZ & FISHER**  
• ATTORNEYS AT LAW •

100 STERLING PARKWAY, SUITE 300  
MECHANICSBURG, PENNSYLVANIA 17050  
Telephone: (717) 243-6222 or (717) 590-8529  
Facsimile: (717) 960-1123  
Email: [rsaidis@ssfadvocates.com](mailto:rsaidis@ssfadvocates.com)  
[www.ssfadvocates.com](http://www.ssfadvocates.com)

CARLISLE OFFICE  
By Appointment Only  
72 West Pomfret Street  
Carlisle, PA 17013  
REPLY TO MECHANICSBURG

March 16, 2023

VIA EMAIL [deball@pa.gov](mailto:deball@pa.gov)

PennDOT District 2-0  
Attn: Dean Ball, PE  
70 PennDOT Drive  
Clearfield, PA 16830

Re: SCAC Comments Draft PEL

Dear Mr. Ball:

I am submitting my comments to the PEL of the State College Area Connector ("SCAC") Study.

My comments are primarily addressed to the new construction of a full interchange on 322 equidistance between the existing Potter Mills Gap exit and the Boalsburg exit ("New Interchange"). The New Interchange would exit onto a road to be constructed connecting the New Interchange to Route 45 (collectively the "45 Connector").

#### A. Interchanges

The PEL does not address modification to the existing interchanges which would eliminate the need for the New Interchange.

##### 1. Potters Mills Gap (PMG) Interchange

There is no discussion of modification to the PMG. In particular, totally absent is any reference making PMG a full interchange without the existing obstacles. Discussion of the road improvements necessary to safely connect PMG to Route 144 is nonexistent. Modifications would permit traffic, including truck traffic, to exit safely from Route 322.

RS-1

PennDOT District 2-0  
Attn: Dean Ball, PE  
March 16, 2023  
Page 2

<p><b>2. Boalsburg Interchange</b></p> <p>Again, there is no discussion concerning modification of the existing Boalsburg partial interchange to a full interchange or other modifications at the Nittany Expressway.</p>	RS-1
<p><b>3. Engineering Technical Memorandum of February 2023 (“ETM”)</b></p> <p>Only the ETM references improvements/construction of an interchange. It only addresses the 45 Connector. This is addressed in Section 2.4.4 of the ETM. The ETM contains no discussion of the PMG or the Boalsburg Interchanges.</p>	RS-2
<p><b>4. FHWA Recommendations</b></p> <p>Compliance with FHWA does not necessitate the construction of the 45 Connector. The FHWA recommendations for interchanges on interstate highways or limited access highways in rural areas would be complied with if the PMG and Boalsburg Interchanges were made full interchanges or reconstructed.</p>	RS-3
<p><b>5. Analysis of Interchanges</b></p> <p>There is inadequate analysis and discussion of the potential effect of PMG and Boalsburg full interchanges on the need for the 45 Connector.</p>	RS-4
<p><b>6. PennDOT Representations</b></p> <p>There were representations at all PennDOT public meetings that the improvements of the PMG and Boalsburg full interchanges would be considered.</p>	RS-4
<p><b>B. Safety</b></p> <p>The section of 45 within the PEL discussion has over fifty (50) access points, various speed limits, commercials uses directly accessing 45 and numerous vehicles traveling at a high rate of speed.</p> <p>45 is patrolled by the Pennsylvania State Police (“PSP”). Guardrail accidents, numerous rear-end collisions and other accidents, witnessed by residents, are not reported. Vehicles which are drivable proceed without PSP or any other official report. Both the elected officials and residents know that 45 is much more dangerous than contemplated by PennDOT. The PEL should contain discussion of these factors and address them in an appropriate manner.</p>	RS-5

PennDOT District 2-0  
Attn: Dean Ball, PE  
March 16, 2023  
Page 3

**C. Local Government Input**

**1. Potter Township**

The Supervisors of Potter Township have opposed the 45 Connector since its inception. The Township's letter to PennDOT dated October 18, 2022 states that "the Connector to PA 45 should be eliminated from consideration."

RS-4

**2. Centre County Comprehensive Plan Phase II (2016-2020)**

The Phase II Plan separated the study area into regions with Route 45 being primarily in the Penns Valley Region.

The Phase II Plan includes multiple recommendations to support the Penn Valley Region's efforts to preserve its agricultural and historical character, and includes the following:

- a. The Plan directly addresses 322 with recommended improvements for a complete connection of the existing four-lane US 322 highway to the Mount Nittany Expressway. It expressly, as stated on page B6 of the PEL, avoids the creation of a new highway corridor that could induce future demand for development within the Region and is committed to the preservation of its historic and rural character. The 45 Connector would create a new highway corridor.
- b. The regional goals of the Plan included vigorously defending the rural character and lifestyle throughout much of the Region which would be destroyed by a 45 connector which by logical implication will result in more development along the existing Route 45 from 144 to Boalsburg.
- c. In fact, the Plan notes that "local officials would strongly object to the construction of an interchange within the Region as it could produce an inducement to large scale development that would conflict with the Region's overall community development objectives." (B7)

RS-6

**D. Ignoring Existing Traffic Patterns and Surrounding Uses**

The PMG Interchange onto 144 and proceeding to the intersection with 45 is a long-standing existing corridor. It has and does serve as the link from 322 to 45 east. The portion of Centre County along 45 east is the primary agricultural sector of Centre County.

The Boalsburg Interchange has been in existence for numerous years accommodating residents traveling west to State College. The location of the proposed 45 Connector does not add any significant benefit to westbound State College traffic.

RS-7

PennDOT District 2-0  
Attn: Dean Ball, PE  
March 16, 2023  
Page 4

Development of the residential neighborhoods and commercial uses around the PMG and Boalsburg Interchanges are in place. The construction of full interchanges at PMG and Boalsburg are consistent with existing neighborhoods and uses as well as their pattern of development or expansion.

The residents and business owners knew they were moving into an area easily accessible to the Interchanges, the type of development which would surround interchanges and the increase in traffic. Residents adjacent to the 45 Connector had no reason to anticipate such changes. The 45 Connector is a surprise to residents who bought or developed real estate totally unaware of PennDOT's intention, or even possible consideration, of the 45 Connector.<sup>1</sup>

RS-4

On the contrary, construction of a 45 Connector with a new road passing through agricultural land, close to existing residential uses and exiting onto surrounding residential uses on Route 45 is the first step to the creation of a new highway corridor. The new highway corridor is incompatible with existing neighborhoods, road conditions and safety issues.

There is inadequate discussion of the realistic improvements necessary by reason of the 45 Connector creating a new highway corridor on what already is a failing road.

## E. Summary

In summary, my comments with regard to the PEL address the following areas:

1. It totally ignores modification of existing interchanges at PMG and Boalsburg and their effect on Route 45;
2. It downplays the existing traffic conditions on 45 which are failing at this time and the 45 Connector would worsen the safety of travelers if constructed;
3. There is no discussion of methods for the mitigation of traffic through the Centre County agricultural sector east of 144 toward Lewisburg;
4. It inadequately addresses potential ways to divert traffic from 45 to assist the implementation of the Centre County Comprehensive Plan;
5. The 45 Connector is not addressed as what it is: the first step to creation of a new highway corridor.

RS-1

RS-4

RS-7

RS-6

<sup>1</sup> PennDOT, while not admitting the 45 Connector was a last-minute addition to the SCAC, relies on a 45 Connector raised in 2003 as part of an incomplete study. However, it was not disclosed to the public until April 22, 2022.

RS-8

PennDOT District 2-0  
Attn: Dean Ball, PE  
March 16, 2023  
Page 5

Thank you for reviewing my comments. As always, if you have any questions, please do not hesitate to contact me.

Very truly yours,

SAIDIS, SHULTZ & FISHER



Robert C. Saidis

RCS/dth/t

cc: Thomas J. Zurat, Jr., P.E. (via email [tzurat@pa.gov](mailto:tzurat@pa.gov))  
Jodi Schultz (via email [jodschultz@pa.gov](mailto:jodschultz@pa.gov))  
Potter Township Supervisors (via first class mail)  
124 Short Road, Spring Mills, PA 16875

### Comment Response:

RS-1: The PEL Study was developed to provide an overview of the various alternatives including general interchange locations. As the proposed Build Alternatives are corridors and not fully engineered designs, much of the layout and detail has not been developed. The *Engineering Technical Memorandum* has been expanded to provide available information regarding the interchanges at Potters Mills Gap, Boalsburg, as well as the midpoint interchange.

RS-2: The interchange section of the *Engineering Technical Memorandum* has been expanded to discuss interchanges at Potters Mills Gap, Boalsburg, as well as the midpoint interchange.

RS-3: FHWA does not dictate interchange requirements. The AASHTO Greenbook *A Policy on Geometric Design of Highways and Streets* provides general guidance on interchange spacing in both rural and urban areas. In rural areas, minimum interchange spacing is 2 miles. The Greenbook also states that in areas where interchange spacing exceeds 5 miles, emergency access crossovers should be provided to avoid excess travel for emergency responders and law enforcement vehicles.

RS-4: PennDOT has committed to conducting more detailed traffic analyses to evaluate the various interchange scenarios at Potters Mills Gap, Boalsburg, as well as the midpoint interchange. These efforts will be coordinated with local officials and consider travel needs and surrounding land use. This evaluation will also include the proposed US 322 to PA 45 connection. Under any of the Build Alternative scenarios (US 322-1OEX, US 322-1S, or US 322-5), should the traffic analyses indicate that a connector is necessary to improve mobility and aid the State

College Area Connector project in meeting the defined transportation purpose and need, PennDOT will include the US 322 to PA 45 connection. PennDOT will work with the townships and area residents to minimize impacts to the surrounding community. Additionally, should the associated analysis show that the Build Alternative, with the connector, adversely impacts conditions on PA 45, PennDOT would incorporate necessary improvements into the project. Conversely, if the analyses determines that a US 322 to PA 45 connection is not necessary to improve mobility and aid the State College Area Connector project in meeting the defined transportation purpose and need, the connection will be removed from the project.

RS-5: The Draft PEL Study report discloses in Chapter 3 that the crash analysis is based on reportable crashes. PennDOT acknowledged that there are unreportable crashes on many of the roadways in the study area, however, decisions and recommendations must be based on documented information. The crash analysis and resulting Highway Safety Manual (HSM) analysis follows standard evaluation procedures.

RS-6: The State College Area Connector Study has reviewed the Centre County Comprehensive Plan and will work with local officials to develop an alternative that meets the transportation needs and works to minimize impacts including preserving the rural and historic character of the area to the extent practicable. It should be noted that if the PA 45 connector is included as part of the project pending the traffic analysis results, the roadway would not be a four-lane divided highway. The potential future connector is envisioned to look and function like a local road, two 11' to 12' lanes with 4' to 8' shoulders.

Regardless of interchange locations and access to a future facility, local land use development is regulated by the local municipality and not PennDOT. Land use controls along with utilities would guide or prohibit future development.

RS-7: As stated in RS-4, traffic and interchange analysis will be conducted and coordinated with the local officials.

RS-8: The proposed PA 45 connector was not a "last minute addition" to the State College Area Connector. At the September 2021 Open House Public Meeting, the proposed corridors were displayed with large circles in proposed interchange locations. These were presented as high-level conceptual corridors. Following that public meeting, the engineering team advanced the conceptual design to evaluate local access at the interchanges which included the PA 45 connector. This information was then provided for public review at the April 2022 Open House Public Meeting. While a previous study evaluated various alternatives, the State College Area Connector study is conducting independent evaluations and making recommendations on current investigations.



**Commenter:** Schenker, Guy

Guy Schenker  
[REDACTED]  
[REDACTED]  
[REDACTED]

Dean D. Ball, P.E.  
Assistant District Executive – Design  
Engineering District 2-0  
70 PennDOT Drive  
Clearfield, PA 16830

Dear Mr. Ball;

I am writing in regard to your SCAC Project and how it relates to The Michael Jack Estate, my home since 1994.

After pouring my heart into restoring and rejuvenating this historical treasure for 28 years, I and my wife were forced, for both family and professional reasons, to relocate. Unfortunately, we listed the home for sale at precisely the same time last year when your SCAC Project map was made public --- showing all 3 options under consideration to go right through the front porch.

As you can imagine, we had (other than one curiosity seeker) not a single showing of the property. Yet, our realtor had more online views in a single day than he has ever seen. The interest in this magnificent property was there, but the SCAC map prohibited any follow-through. My wife and I are, in effect, prisoners in our home, with no means of escape.

At last October's SCAC Project public meeting, I was fortunate to speak face-to-face with 3 key individuals in your Project --- a PennDOT engineer, an engineer from your engineering consulting company, and the individual who evaluates historical properties. All assured me --- clearly off the record, yet sincerely --- that in all probability, in this West end of the Project, the 4-lane will run South of the existing 322, with a sound wall between it and the present highway. The 2-lane will be retained and upgraded as the permanent road for local traffic.

Now, your February 2023 PEL report confirms that all 3 routes still under study will indeed preserve the appeal of The Michael Jack Estate. To quote:

"US (322-1S, & 322-1OEX, & 322-5) would begin at the existing US 322 - 1S interchange with PA 45 near Boalsburg and follow existing US 322 to a point east of the Elks Club Road/Bear Meadows Road intersection. In this area, a two-lane service road would be provided on the north side of the limited access highway to provide connectivity to the local road network."

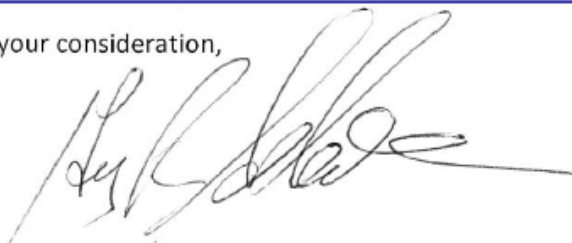
GS-1

We want to list with our realtor again --- this time, being able to assure all prospective buyers that the property will not be severely impacted by the new highway construction. Is it too much to ask, Mr. Ball, that you reinforce our position by simply signing this letter? (I have enclosed a self-addressed stamped envelope.)

GS-2

Thank you for your consideration,

Guy Schenker



**Response:**

GS-1: Due to the use of Federal Highway Administration (FHWA) funds, the project will be subject to the requirements of Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended, and the implementing regulations of 36 CFR 800 (Section 106). This law requires agencies to consider how a project could impact cultural resources in the project area. Cultural resources are buildings, structures, sites, objects, or districts that have local, regional, or national significance. In the context of Section 106, cultural resources are listed in the National Register of Historic Places (NRHP) or have been determined eligible for listing in the NRHP. The Michael Jack Estate was determined eligible for listing in NRHP by the Pennsylvania Historical and Museum Commission (PHMC, the State Historic Preservation Office) in 1981. The PHMC reaffirmed the property's eligibility in 2004. The Michael Jack Estate is one of several historic resources within the project area, including the Penns-Brush Valley Historic District. PennDOT is committed to avoiding and minimizing impacts to these resources to the extent practicable, however, until the design is completed, and the right-of-way needs are determined, PennDOT cannot confirm that there will be no impacts to the Michael Jack Estate property. Currently, PennDOT is conducting a historic resources reconnaissance survey of all buildings within a refined study area constructed prior to 1981 to identify additional potential historic resources. Once that is complete PennDOT will work with the PHMC to determine NRHP eligibility for sites identified. Following the eligibility determinations, PennDOT will evaluate additional modifications to the alternative to further avoid or minimize impacts to historic resources. Once the alternative refinement is complete, an effects determination will be made to determine the project's potential impact on historic resources in order to fulfill the requirements of Section 106. The effects determination will include an analysis of direct impacts and indirect (viewshed) impacts to historic resources, considering each resource's historic character and area of significance. Through coordination with PHMC and identified consulting parties, measures to mitigate any adverse impacts to historic properties, potentially including the Michael Jack Estate, will be developed and implemented through a Programmatic Agreement.

GS-2: PennDOT is committed to avoiding and minimizing impacts to historic resources to the extent practicable, however, until the design is completed, and the right-of-way needs are determined, PennDOT cannot confirm that there will be no impacts to the Michael Jack Estate or any other property in the vicinity of the proposed alternatives.

**Commenter:** Scherr, Adam

**From:** Scherr, Adam [REDACTED]  
**Sent:** Thursday, March 16, 2023 10:45 AM  
**To:** Ball, Dean D <deball@pa.gov>  
**Subject:** [External] State College Connector Complaint

Hello,

My name is Adam Scherr and I am a student at Penn State University. I am against the construction of the State College Connector.

I understand why a road such as the one proposed in the State College Connector plan would appear to have benefits, but I think the costs to the community and the individuals affected will be far greater. To lead, widening roads or making additional roads does not reduce traffic (one of many sources: <https://www.wired.com/2014/06/wuwt-traffic-induced-demand/>). The crux of this project is nearly negated when you acknowledge this foundational issue.

AS-1

I also think this project shouldn't take place because it perpetuates a cruel system that favors those who already have money. Roads have been the answer to transportation problems time and time again ever since the automobile industry started lobbying governments to prioritize car travel over public transit, such as bus and train travel. Building this road will increase the reliance of roadways that are expensive to maintain, and further widen the mobility gap between middle class people who can afford cars and poorer people who can't afford the costs to insure and maintain a vehicle.

AS-2

I think the greatest reason of all to not build this highway is that it only slightly builds on the State College community at the serious detriment to the rural townspeople in the area. Generational, family owned farms are being encroached upon from all fronts in the form of suburban developers buying up land, competition with industrial and commercialized farms, and general abuse from the public who think that the land is wasted on agriculture. Generational farms have the structure for improved sustainability and provide local food to the communities that surround them. The construction of this road would not only plow through and conquer land that for decades supplied food to the community, but it would also divide farms and weaken the already challenged growers who rely on the land for their livelihood.

AS-3

At the staggering cost of \$500 million, this roadway "improvement" will slightly benefit a portion of the community while ruining the lives of others, all while failing to fix traffic issues. The US has plenty of roads, and most cause more problems than they solve. This road will not be the exception.

AS-4

I hope that these complaints are taken into consideration. Thank you for providing the opportunity for us to voice our opinions on the project.

Sincerely,  
Adam Scherr  
Master's Student, Penn State Department of Entomology

**Commenter:** Scherr, Adam

**Response:**

AS-1: According to research published by the Transportation Research Board (TRB) and the Journal of Transport and Land Use, "latent demand" and "induced demand" are two concepts in transportation planning that describe different aspects of travel behavior and its relationship with infrastructure and services.

Latent demand refers to the existing or potential travel demand currently unmet or underserved due to various reasons such as lack of infrastructure, limited services, or other constraints. Induced demand refers to the phenomenon where the expansion or improvement of transportation infrastructure or services leads to an increase in travel demand beyond what was initially anticipated. This increase in demand is often attributed to factors such as reduced travel time, improved accessibility, or enhanced convenience resulting from the new infrastructure or services.

The phenomenon of latent/induced demand occurs with transportation improvement projects when a bottleneck is removed, capacity/throughput is increased and a faster route results in a shifting of traffic to the faster route.

These dynamics are taken into account as part of the travel demand/traffic forecasting process with the use of the Centre County Regional Travel Demand Model (CCRTDM). Future traffic volumes generated by a travel demand model are based on the existing roadway network with future planned/programmed transportation improvements as well as existing development and anticipated future development, through coordination with the county and local municipalities (cities, boroughs, and townships) within the surrounding region. Thus, the use of a travel demand model in the traffic forecasting process helps designers better predict the change in travel patterns/volumes that are anticipated to occur with a regional transportation improvement project such as the State College Area Connector. The goal of the State College Area Connector project is to shift modeled traffic volumes from the local roadway network to the Build Alternative to improve safety and provide an efficient way for traffic to move through the area rather than have traffic impact the local roadway network (No Build Alternative).

AS-2: PennDOT and the Federal Highway Administration (FHWA) initiated the State College Area Connector PEL Study to identify and assess transportation challenges within the study area to provide a foundation for the development and evaluation of a range of alternatives. Through an analysis of the existing infrastructure's inability to effectively serve the existing and projected movement of people and goods, a purpose and need statement was developed to define the direct transportation-related needs within the study area and reflect the regional land use vision and broader goals of the communities surrounding the corridor.

The purpose of the State College Area Connector PEL Study is to develop and evaluate a range of alternatives to improve mobility and meet the needs of interstate, regional, and local traffic passing through and moving within the study area by reducing congestion, improving safety, and addressing system continuity with consideration for all modes. Through the alternative screening process, it was determined that alternatives (e.g., transit only or bicycle and pedestrian improvements) that do not address the movement of both personal automobiles and freight trucks

would not meet the transportation needs in the area. Essentially, the alternatives screening determined that three Build Alternatives (US 322-1OEX, US 322-1S, and US 322-5) would best meet the identified needs while minimizing potential impacts to the natural and built environment.

The National Environmental Policy Act (NEPA) phase of the project will include an environmental justice analysis and any alternative will comply with the provisions of Executive Orders 12898 and 14096.

AS-3: PennDOT recognizes the importance of farmland in the study area and that the extent of the productive agricultural land, and the viability of the farm operations/businesses are not only major contributors to the local economy but also contribute to the cohesion of the rural community and the historic heritage of the study area. Given the extent of farmland in the study area, it is not possible for a major transportation improvement project to avoid all potential impacts. However, PennDOT will make every effort to minimize impacts to these resources. To fully understand the farm operations in the area and how to best minimize potential impacts, PennDOT anticipates that a Farmland Assessment Report will be prepared during the detailed studies conducted in the preliminary engineering and detailed environmental studies (National Environmental Policy Act [NEPA]) phase of the project development. Preparation of the report requires extensive interviews with all potentially impacted farm operators to identify and document the nature, features, and extent of their operations, including all farm-related structures, existing access and pathways, and other resources of the farm operation. Interviews with farm operators and landowners will also identify any leased properties required for the successful operation of potentially affected farm operations. The report will also document the potential avoidance and minimization measures considered and the assessment of potential impacts to the viability of individual operations. PennDOT cannot acquire right-of-way to productive agricultural land or Prime agricultural land unless the Agricultural Land Condemnation Approval Board (ALCAB) gives approval, or the landowner amicably agrees to the conversion to transportation use.

Conversely, private development is not required to advance through the ALCAB process and is controlled at the local level by zoning and local development requirements.

AS-4: The proposed Build Alternative options identified for further study will meet the transportation needs identified in AS-2. This includes improving safety, congestion and meeting driver expectations for the movement of goods and people.

**Commenter:** Schwier, BT

**From:** BT Schwier [REDACTED]  
**Sent:** Sunday, March 19, 2023 10:55 PM  
**To:** Ball, Dean D <deball@pa.gov>  
**Subject:** [External] Observations in SCAC Draft PEL Study Report

Commenting on State College area Connector Project – due date March 19, 2023

The following represents my Observations in SCAC Draft PEL Study Report:

The report did not mention an elevated highway similar to the six-lane elevated Bang Na Expressway (aka the Bang Na-Bang Phli-Bang Pakong Expressway or the Burapha Withi Expressway) runs for 54 km (33.5 miles) through Bangkok, Thailand, and was constructed using 1.8 million m3 (63.5 million ft3) of concrete. It was opened on 7 February 2000 at a cost of \$1 billion (then £770 million). Was this ever considered as another option during your meetings?

BTS-1

Page 13 Para 6

is be: PA 44 - should be: PA 144

Page 25 para 5

How will Public Transportation Alternative use PA 192?

Pennsylvania Route 192 (PA 192) is a state highway located in central Pennsylvania.

The western terminus of the route is at PA 144 in Centre Hall. The eastern terminus is at U.S. Route 15 (US 15) in Lewisburg. Note: Figure 6-2 properly identifies Brush Valley Rd (SR 2006/PA 192)

BTS-2

Page 26 Figure 4-2  
missing 20' Grass land label for median

Page 38

The County's active preservation program for protecting farmland from development in Penns and Nittany Valleys comprise a large part of the study area. This not only includes the ASAs created by local municipalities to extend benefits to farmers to ensure the viability of their operations, it also includes ACEs that preserve the land for farming uses in perpetuity. BTS-3

Comment: Hopefully your statement "land for farming uses in perpetuity" is true and will be honored!

Page 85

Analysis conducted as part of the PEL Study did not identify the need for specific geometric or safety improvements at the intersection (Figure 8-6). The existing intersection is skewed, which makes left turns in and right turns out of Church Hill Road more difficult to navigate. BTS-4

Comment: Your analysis failed to mention making a left turn out of Church Hill Road is quite precarious due to limited driver visibility. The hill crests in both east & west directions limits sight of the road and oncoming traffic. The speed limit is also 55 mph thus the closing speeds of oncoming vehicles are quite rapid making this an unsafe intersection for local residents and community members.

There were no routes presented using the mountain ridge similar to I99 in route 220 valley. State game lands are Commonwealth owned thus reducing the overall land purchase costs and minimizing interfacing with citizens of the area. Have you contacted the Commonwealth agency that owns the land to verify it's not for sale? BTS-5

Thank you for your time and consideration in this matter.

BT Schwier

**Response:**

BTS-1: The State College Area Connector Study Build Alternatives considered were developed in accordance with PennDOT and Federal Highway Administration (FHWA) standards for the appropriate classification of roadway. These standards establish the requirements for design speed, severity of horizontal curvature, maximum and minimum vertical grades, number and width of travel lanes, and other design parameters. The Build Alternatives have only been conceptually engineered to the extent that corridor widths were determined to establish parameters for identifying potential resources that could be affected and maintaining connectivity of the local road network. An elevated highway, as described, would be economically infeasible. The bridge structures and associated maintenance of elevated structures would cost over 10 times the roadways built on grade. In the event of an emergency, blocked lanes on an elevated structure may increase emergency response times. Future widening of elevated structures would be more

difficult and costly than roadway widening. In addition, maintenance operations such as snow removal and storage on a structure are more difficult due to the limited width. An open grassed median is more efficient for snow removal and drainage. The future National Environmental Policy Act (NEPA) phase of project development will identify specific design elements that can be advanced to minimize impacts in specific locations (e.g., bridged locations, elevated roadways, bifurcated roadway, etc.), however, a continuous elevated highway has not been considered.

BTS-2: PA 44 was updated.

PA 192 was removed as a Public Transit Option through the study area.

Potential median widths are 18' or 36'. Both are identified on Figure 4-2 accordingly.

BTS-3: PennDOT acknowledges the importance and history of farming throughout the project study area. As part of the project development process, PennDOT has been and will continue to coordinate with the farmers to gain a full understanding of each operation and their respective agricultural lands. Efforts through the PEL Study have incorporated measures to minimize impacts to agricultural lands. As the project advances, the project study area has been reduced from 70 square miles used for the PEL down to 6 square miles for the NEPA phase. With this reduction in study area, a substantial portion of the Agricultural Conservation Easements (ACEs) across the Penns and Brush Valleys are no longer within the project study area, thereby facilitating their long-term protections.

The identified agricultural resource protection, including agricultural conservation easements does allow productive agricultural land to remain in production for perpetuity specific to the use of that property. PennDOT cannot acquire right-of-way to productive agricultural land or Prime agricultural land unless the Agricultural Land Condemnation Approval Board (ALCAB) gives approval, or the landowner amicably agrees to the conversion to transportation use.

Furthermore, additional efforts will be included in the project development process to avoid and minimize agricultural impacts, including ACEs. Due to the extent of agricultural lands, even along existing Route 322, complete avoidance is not practical, but minimization measures will be considered to identify the alternative that provides the best balance of transportation improvement with the minimization of agricultural impacts, including ACEs, to the extent practicable.

BTS-4: Sentence was updated to reflect concern. "The existing intersection is skewed, with noted sight distance concerns, which makes turns into and out of Church Hill Road more difficult to navigate."

BTS-5: Right-of-way costs are not a driving factor on the development and advancement of an alternative. The Build Alternatives advanced in the PEL Study were identified as the best corridors which avoid and minimize overall natural, cultural, and socio-economic impacts while meeting the study purpose and need. Additionally, use of State Game Lands is protected by Section 4(f)/Section 2002 requirements.



**Commenter:** Sekula, Thomas

PennDOT District 2-0

February 23, 2023

Attn: Mr. Dean Ball P.E.,

70 PennDOT Drive

Clearfield, PA 16830

Subject: Comments for Proposed State College Area Connector

Dear Mr. Ball,

I must commend PennDOT on the accuracy and thoroughness of the PEL Report for subject as above. It is Quite a Report and rarely seen in today's fast environment. Well Done!

My review was general in nature with its scope entailing the overall concept of the alternatives. I think PennDOT will be spending limited funds wisely by focusing on the US-322 Southern alternatives.

TS-1

As for the Mt Nittany (PA144-1 thru 3 alternatives) I believe PennDOT will encounter imaginable conflict once the Public fully comprehends the impacts of said routes which seem to result in very limited benefit vs the Overall Costs to the Public. Unless you plan to continuous tunnel thru Mt. Nittany and construct without open area access or air vents somewhere, as used at Blue Mountain I believe it's a war not worth fighting with very little value added with substantial downside to PennDOT!

TS-2

First, I believe with our changing environment WE should focus on Preservation rather than expansion. I believe the Public will see Mt. Nittany as a Public Treasure destined for future generations. Secondly, I would be concerned of the unseen costs expected with examples being, Obtaining Public Approvals, Penn State Students, Public Residents and social media invoking the opinion and rath of the entire United States. Not to omit In Field Delays for planning, surveying and construction, Tree Huggers, Bad Publicity, and so forth. Just imagine the huge cost to the Public and PennDOT for saving minimal travel times not to mention the 1. Lost cost savings used to justify the initial US322 /I-99 Construction around State College which is in itself quite impressive and 2. Lost local business.

TS-3

I hope I have provided constructive comment that will save us all a lot of work and costs!

Moving on, I would like to inquire very preliminary as to the viability of a PennDOT Highway Occupancy Permit along N. Atherton Street. My address [REDACTED] shares about 147 feet of access along N. Atherton behind the CVS, I believe that in lieu of my home, access to N. Atherton Street, similar to the Village Drive Access serving the Comfort and Sleep Inns, should have been constructed as the existing Willard Street access is not quite right, I would be interested in PennDOT's very preliminary thoughts on the matter.

TS-4

I appreciate your good work in serving the State College Area,

Sincerely,



Thomas Sekula

[REDACTED]

[REDACTED]

**Response:**

TS-1: Thank you for your comment.

TS-2: A tunnel alternative was dismissed from previous studies due to initial construction and long-term maintenance costs. Other current factors that would deem tunneling as infeasible include excessive impacts to the existing underground mining operations and quarries, and the probability of encountering pyritic material during blasting and excavation operations. The cost of handling and disposal or treatment of the pyritic material would be factored into the costs of this alternative. Additionally, trucks carrying hazardous materials would not be allowed to traverse the tunnel, therefore would remain on the local roadway network. As stated in the Draft PEL Study report, the three PA 144 Build Alternative options were not advanced for further development and study.

TS-3: PennDOT and Federal Highway Administration (FHWA) initiated the State College Area Connector PEL Study to identify and assess transportation challenges within the study area to provide a foundation for the development and evaluation of a range of alternatives. Through an analysis of the existing infrastructure's inability to effectively serve the existing and projected movement of people and goods, a purpose and need statement was developed to define the

direct transportation-related needs within the study area. Based on the predicted increases in traffic, preservation of the existing system or a No Action/Build Alternative would not address the transportation purpose and need.

TS-4: PennDOT has provided a response to this comment independent of the PEL Study. This area is outside of the PEL study area.

**Commenter:** Sentesy Wagner, Mark

**From:** Sentesy Wagner, Mark Andrew [REDACTED]  
**Sent:** Sunday, March 19, 2023 8:59 PM  
**To:** Ball, Dean D <deball@pa.gov>; Murnyack, Eric J <emurnyack@pa.gov>  
**Subject:** [External] Oppose the 322 Connector Project

Dear Planning Committee,

**I am writing to oppose the State College 322 Area Connector project.** For the seven weekends that the road would actually help ease traffic congestion, the proposal would spend half a billion of taxpayer dollars for a mere 13 miles of road -- \$38 million per mile. With that money we could pay for four years of university for every one of the 2370 students at the State College Area High School by offering each of them a \$211,000 scholarship.

MSW-1

It's an awful waste of money. **But it's worse than a waste of money: it will make things worse in the whole region.**

First of all, the connector project will increase the number of cars driving that route, which will increase traffic congestion in the region. Research shows that increasing numbers of lanes leads to increasing car usage ("induced demand"). Traffic always tends to increase to fill available infrastructure until it reaches the same level of congestion. In short: adding lanes does not solve congestion problems. What it does do is increase car dependency.

MSW-2

Second, the project just kicks the congestion problem down the road. It will increase traffic speed and bottlenecks *in denser areas where people live and work*. Removing traffic bottlenecks on the roads to local towns will increase the number and speed of cars in town, since more cars arrive more quickly. This will create more hazardous conditions for everyone, especially pedestrians and cyclists, and will lead to an increase in pedestrian and cyclist deaths. It will reduce safety and quantity of walking and biking.

I live next to 322/South Atherton, and I never allow my children to cross it alone, even at a stoplight, because four to five lanes of traffic is a life-threatening situation, and violent car death is the leading cause of mortality for children. Large roads like Atherton and the 322 connector should never be allowed near residential neighborhoods, and *the 322 would make traffic on Atherton and all other streets in the area more dangerous.*

MSW-3

On top of this, the State College area is already absurdly congested during the 7 busiest weekends. Expanding the 322 will increase the number of drivers who do not know the streets, increasing threat levels for everyone, and increasing the amount of driving in town as people extend their driving time hunting for parking. What would the solution be to that problem? Bulldoze areas of the town to ease traffic flow? The cycle of increasing car infrastructure needs to end. An unobstructed highway leading directly to the town will just make things worse.

Third, increasing car usage increases dust and soot (pm2.5) and other fossil fuel pollution that according to research leads to an increase in lung and heart disease and neurological disorders (e.g. even short term exposure to diesel fumes leads to lower cognitive ability and long term is linked to depression), and harms local farmland.

MSW-4

So what solutions should we invest in instead?

Because cars are so inefficient in using space (see image below), it turns out that increasing bus, bike, and pedestrian access can actually increase "throughput" (i.e. number of people moving through a space over time). In other words, replacing cars with bus and bike infrastructure is the only way actually to reduce car congestion in the long term.

MSW-5

At the same time compared to sooty dusty noisy highways, biking, walking, and taking the bus improves people's health, and the mobility of youth, the disabled, and seniors. As noted above, research shows that reducing car traffic can significantly increase safety.

Increasing car traffic along these routes would make it even more difficult and dangerous to visit business on both sides of the road than it already is. This is because a significant benefit of reducing car traffic is that because it makes travel safer people can stop more easily, which increases business. This could increase the attractiveness and business opportunities in the Boalsburg area – especially if the existing roads were made safe for pedestrians and cyclists by reducing the lanes along 322 where it cuts Boalsburg in two, dividing the recreational areas and bike path from the town.

Research shows that to reduce congestion, the solution is to *make other forms of transportation more convenient*. \$500 million could increase the number of lanes along 322 that are safe for people – families, children, elders, festival and farmer's market-goers – on foot and on bike. When buses and bikes don't get stuck in car traffic, people will use them more often. Investing in bus and bike infrastructure will, just like car infrastructure, increase how much it is used.

If the connector project is intended to facilitate safe access to State College during football and move-in / move-out weekends, there are far better solutions. For example, the transit authority could invest in creating park and ride locations, in frequent bus / shuttle routes (every 5-10min), and in allocating lanes for buses and bikes instead of cars. \$500 million could be an effective investment in creating frequent inter-city bus connections so that people could avoid the traffic, and avoid causing traffic, stay safer, and reduce hazardous traffic at their destinations. \$500 million would also be a significant down payment on a project to return light rail to the area via the old railway route that connected State College with the Harrisburg to Pittsburgh line at Tyrone.

I urge you to cancel the proposed 322 connector route and invest instead in best-in-class infrastructure-level car replacement, reduction, and traffic calming. The health and safety of people in the region depend on it: do not endanger our lives, and the lives of our children.

MSW-6

Best,

Mark

## Response:

MSW-1: It is recognized that Penn State University holds or sponsors events such as football games, concerts, festivals, and graduations that attract a substantial amount of traffic that travels through the PEL study area. This traffic is not the focus of the operational traffic analysis for the PEL Study (including the Study's Purpose and Need analysis). The traffic model is based on traffic for an average day throughout the year, not on special event traffic conditions. Traffic data collected for the project was obtained while schools (local primary schools as well as secondary schools) are open. Traffic data obtained and analyzed for this study is based on daily and peak hour traffic volumes and conditions for an average day of the week (e.g., Tuesday, Wednesday, Thursday) during a non-holiday/non-special event. If PennDOT would design to accommodate special events, the transportation projects would be excessively large to accommodate additional traffic. Any proposed transportation project would improve event traffic but would not fully address all of the event traffic needs.

MSW-2: The 2050 traffic volumes for the PEL Study were developed for the no build scenario and then applied in the traffic model with the inclusion of the Build Alternative to determine predicted roadway volumes. These projections include a shifting of traffic from the existing roadway network

onto the proposed alternative, as presented in Figures 6-10 through 6-15 in the Draft PEL Study report and traffic volume tables in the supporting documents.

MSW-3: The US 322 Build Alternatives recommended for advancement into the preliminary engineering and environmental studies (National Environmental Policy Act [NEPA]) phase each consist of a new 4-lane limited access roadway separate from the existing US 322 roadway, which will remain as a local roadway to maintain local access to the existing properties and businesses along existing US 322. The shifting of a substantial amount of traffic onto the new roadway reduces traffic remaining on the local roadways and would improve conditions for pedestrians and bicyclists.

MSW-4: Air quality will be evaluated as part of the NEPA analysis, as appropriate.

Greenhouse gas (GHG)/Climate Change is a complex issue that is related to regional factors. Project level details are evaluated to ensure they are consistent with regional conformity objectives; however, there is no real mechanism to assess GHG/Climate Change with a meaningful level of detail for individual alternatives of a specific project at the planning level. For transportation projects, congestion is one of the main considerations for potential air quality issues. Since reducing congestion was part of the stated purpose and need of this project, all of the alternatives that were advanced through the Level 2 Screening, which include both the US 322 and PA 144 Build Alternatives, would be considered as sufficiently meeting the regional conformity objectives.

A qualitative evaluation of air quality (which includes GHG and Climate Change) will be completed for the State College Area Connector project as part of the NEPA analysis. Both the PA Climate Action Plan and Centre Region Climate Action Plan have been reviewed and will be considered as environmental studies progress. PennDOT will also work with FHWA and other agencies to apply interim guidance, as applicable for the State College Area Connector project.

The strategies and objectives to reduce GHG emissions of both the state and local Climate Action Plans will be taken into consideration and incorporated into the air quality and climate change analysis for the State College Area Connector project as more detailed data becomes available during the NEPA process. These considerations will be consistent with current regulations and requirements, using the most current available tools and methodologies.

MSW-5: Buses do provide the ability to move a greater number of people more efficiently than a single automobile or bicycle. However, passenger vehicles are only one aspect of traffic that is being considered as part of this PEL Study. Transit improvements would not address any of the freight movement through the area that is using the local roadway network and creating conflicts with local traffic movements. Additionally, multimodal improvements, such as bicycle and pedestrian improvements, could be included as part of the Build Alternative, where appropriate.

MSW-6: Chapter 4 of the Draft PEL Study report outlines the alternative screening process utilized for this study and Chapter 6 presents the results of the screening process. Based on the information collected and analysis completed, the US 322-1OEX, US 322-1S, and US 322-5 Build Alternative corridors were determined to best meet the transportation purpose and need identified in Chapter 3 from a traffic, engineering, environmental, and planning perspective. The advancement of any of these options would provide benefits to local as well as regional travelers. Regional travelers would benefit by having a consistent travel experience with limited stoppage for local access movements. The local travelers would benefit as nearly 53% of all future traffic

and 73% of truck traffic would be located onto the new facility, thus providing for easier local travel movements on the local roadway system. Additionally, travel safety would be improved on the local roadway network. Under any of the US 322 Build Alternatives predicted crashes decreased on study area roadways due to the diverted traffic volumes, with existing US 322 having the largest decrease. Within the study area, the overall number of crashes would be reduced by approximately 18% and fatality/injury crashes were reduced by approximately 22%.

As part of the Build Alternative, support facilities such as Intelligent Transportation System (ITS) features or park-and-rides will be considered.

**Commenter:** Sheeder, Scott

**From:** Scott Sheeder [REDACTED]  
**Sent:** Thursday, March 9, 2023 5:05 PM  
**To:** Ball, Dean D <deball@pa.gov>  
**Subject:** [External] State College Area Connector PEL Study

Dean,

I'll keep my comments brief. I would like to voice my support for US322-1S. The route serves the objectives of improving mobility and mitigating congestion, while also receiving a high score for minimizing environmental impacts. My wife and I have lived in State College for 25 years. We both work from home, so could live elsewhere. We choose to stay here in large part because of the outdoor recreational resources (hiking, fishing, skiing, cycling, etc.). I place a high priority on protecting the natural resources we love, and would like to see this project move forward to accomplish the primary goals of alleviating traffic hazards, while minimizing the impact on our local natural resources.

SS-1

Best,

Scott

--

Scott Sheeder  
Cell: [REDACTED]  
Email: [REDACTED]

**Response:**

SS-1: Thank you for your comment.



**Commenter:** Shutt, Jennifer

From: Jennifer Shutt [REDACTED]  
Sent: Friday, February 17, 2023 8:40 AM  
To: Ball, Dean D <deball@pa.gov>  
Subject: [External] 322 Connector

Hello Dean,

My name is Jennifer (Jen) and I live in Tusseyville near 322.

Can you explain to me, if it is decided that 322 will be used as an "upgrade" for the connector, who has been in my fields to evaluate the potential for any repercussions from this project?

JS-1

We live in the old part of Tusseyville, our houses that are along Neff Road on the right side, were built in the 1800's....historically speaking. I see no mention of that anywhere in any surveying from PennDOT. But that is not my concern at this time.

Currently, our fields that we struggle to maintain, already have run off issues from homes along 322 and 322 itself. The destruction that will be inadvertently felt by my husband and myself, could be devastating to our property. So much so, that I would rather sell my property to PennDOT and move, than have (what appears to be soon coming) a 6 lane monstrosity of a highway destroying what land we have worked so hard to maintain.

JS-2

We own roughly 1.5 acres that partly run along Sinking Creek, that will be valued at nothing, if we (PennDOT and my family) cannot come to some sort of agreement or at least an informational meeting to put my mind at ease.

JS-3

Thank you for your time,

Jen Shutt  
[REDACTED]

**Response:**

JS-1: The US 322 Upgrade Existing Alternative was not recommended to advance for future study to support the National Environmental Policy Act (NEPA) phase of the project. It should be noted that the eastern and western ends of the Build Alternatives recommended for further study have sections of roadway that parallel existing US 322 but would be designed to accommodate the new 4-lane facility while still providing local access along existing US 322.

PennDOT has a team of consultants conducting detailed environmental field investigations. That includes a historic resources reconnaissance survey of all buildings within a refined study area constructed prior to 1981 to identify additional potential historic resources which includes the structures mentioned along Neff Road. Once the field investigations are complete, PennDOT will work with the Pennsylvania Historical and Museum Commission (PHMC) and the State Historic Preservation Office to determine National Register of Historic Places (NRHP) eligibility for sites identified. Following the eligibility determinations, PennDOT will evaluate additional modifications to the alternative to further avoid or minimize impacts to historic resources.

JS-2: As the engineering design advances into preliminary engineering and detailed environmental investigations, conceptual stormwater management facilities will be positioned to address roadway runoff from the proposed facilities. This could include swales, stormwater ponds/basins, or other acceptable features.

JS-3: A PDF of PennDOT's *Publication 83, When Your Land is Needed for Transportation Purposes (Some Questions and Answers on the PennDOT Acquisition Process)* is available on the project website. Additionally, staff from PennDOT's right-of-way unit have been present at all public meetings to answer individual property owner questions and will continue to be present at all future public meetings. During the right-of-way process, these types of decisions will be made on an individual basis.

**Commenter:** Smith, Fritz

**From:** Fritz Smith <FritzS@happyvalley.com>  
**Sent:** Sunday, March 12, 2023 4:28 PM  
**To:** Ball, Dean D <deball@pa.gov>  
**Subject:** [External] State College Area Connector

Dear Mr. Ball:

As the Chief Executive of Centre County's Officially Designated Tourism Promotion Agency, I am writing to provide the thoughts collectively of the staff here at the Happy Valley Adventure Bureau (HVAB) with respect to the PEL report. The HVAB serves a membership base of over 330 organizations, many of whom are located in the affected corridor. Each of the options currently analyzed would have an impact on some group of our members, as well as to the natural environment contained therein which offers recreational opportunities to visitors and residents alike.

As the various options are being analyzed, we would ask that due consideration be given to the substantial historical, recreational, retail, and agri-tourism related businesses, organizations, structures, designations, and natural built environment that contribute to the health and welfare of the visitor economy, as well as to the quality of life for our Centre County residents. Any choice that would negatively affect such entities could be harmful to livelihood of many people involved in providing a visitor experience and serve as a counter-productive measure affecting the substantial amount of public dollars being spent to market Centre County as a tourism destination of choice.

FS-1

We ask that the principals involved in these discussions keep these considerations in mind when making a choice that will have ramifications that last for many years.

Thank you for the opportunity to comment.

Fritz Smith  
President & CEO  
The Happy Valley Adventure Bureau  
Official Tourism Promotion Agency for Centre County, PA

204 West Beaver Avenue  
State College, PA 16801  
(814) 231-0460 (Direct)  
610-659-0888 (Cell)  
[happyvalley.com](http://happyvalley.com)  
[happyvalleyagventures.com](http://happyvalleyagventures.com)  
[2021 Happy Valley Inspiration Guide](#)  
#HappyValleyPA



**Commenter:** Smith, Fritz

**Response:**

FS-1: PennDOT recognizes the importance of the natural, cultural, and socio-economic resources within the study area. This includes the recreational resources and how they support tourism. To aid in minimizing potential impacts during the preliminary engineering and detailed environmental studies, PennDOT will work to develop alternatives that minimize direct impacts including potential visual impacts which could also harm tourism industry. During these detailed studies, design considerations for proposed transportation improvements will be assessed to reduce natural, cultural/historic, recreational, socio-economic, visual, and noise impacts associated with the proposed improvements. This assessment will address efforts to avoid or minimize adverse impacts to resources and develop mitigation strategies for unavoidable impacts, including potential mitigation measures for adverse visual impacts such as roadside landscaping and context sensitive designs (includes coordination with the local community and consideration of using material, forms, and finishes of highway structures to mimic, complement, or contrast with the existing cultural environment visible from the project corridor, as desired by the community).

**Commenter:** Smith, Michael

**From:** Michael Smith [REDACTED]  
**Sent:** Tuesday, March 7, 2023 7:39 AM  
**To:** Ball, Dean D <deball@pa.gov>  
**Cc:** Laurie Smith [REDACTED]  
**Subject:** [External] Comments on US 322 Connector

Dear Mr. Ball: I live in the Willowbrook Development within close proximity to the existing US 322 and the proposed rebuild. Here are my comments which I would appreciate being considered:

1. A parkway style approach, with a narrower footprint, reduced width between lanes and minimal shoulder, a lower speed limit, and attractive plantings and noise buffering would be much more appropriate than a four lane expressway. It would also present an attractive and well-warranted entry to State College and Nittany Valley. MS-1

2. The current noise level posed by truck traffic is very bad in the stretch from the golf course to the existing four lane highway. If the roadway gets any closer to homes and if trucks are more numerous and travel faster, this problem will only get even worse. In the summer we are unable to sleep with our windows open because of truck noise; not to mention how annoying it is just to relax on our deck. This is an opportunity to correct this problem. Construct noise barriers and prohibit jake brakes along the entire section. PennDOT people have told me that jake brakes can only be controlled by local ordinances. But Harris Township tells me that PennDOT must require it. I'm pretty sure PennDOT can do that if it wants to. MS-2

3. Consider ways to reroute more of the truck traffic to I-80 and the Turnpike where it is more suited. Tolls on the Turnpike are too high, encouraging truckers to take alternate routes. Making truck travel even easier on 322 will only make the problem even worse. Encourage trucks to go north on US 15 to reach I-80 instead of 322. MS-3

4. Harris Township's map shows a proposed bike path from the Willowbrook Development down to Boalsburg village, connecting to the existing bike path. Currently, one must travel along PA 45 which is dangerous and requires one to negotiate a steep hill and the very dangerous right-hand turn onto South Atherton Street. This is an opportunity to improve bicycle access to town and our network of bike paths and improve public safety. Completing the proposed bike path should be made an integral part of this project. I wasn't able to discern this from the planning document but please ensure that any changes at the current transition zone from four lanes to two lanes do not permanently foreclose the potential for the proposed bike route connector. MS-4

5. PennDOT's traffic study indicates that because there have been no bad accidents at the intersection between Willowbrook Dr. and PA 45 that no traffic light or improvements at this intersection are warranted. I disagree. Traffic on PA 45 during commute hours is so heavy that it is very difficult to exit from Willowbrook, necessitating excessively long waits and high speed, white-knuckle entry onto PA 45. Not only is this very inconvenient and unsettling, but it's only a matter of time until there are bad accidents at this intersection. Further, the new access road from Stoney Ridge, immediately opposite Willowbrook Dr. makes it even more of a challenge as those residents, preoccupied with their own difficulty entering PA 45, invariably ignore 4-way intersection take-your-turn rules, with cars from both entry points darting out onto PA 45 at the same time. The obvious solution is to have a stop light at this intersection and providing travelers from points east on PA 45 the option of entering US 322 at a point east of the current entry point (as depicted by one of your proposed routes). MS-5

Thanks for the opportunity to comment,  
Michael W. Smith

[REDACTED]  
[REDACTED]  
[REDACTED]

**Commenter:** Smith, Michael

**Response:**

MS-1: A “parkway concept” or as discussed in the PEL Study, an Upgrade of Existing Alternative would not fully address the purpose and need for this study. The mix of traffic (truck and automobiles and local and regional traffic) creates conflicts that, even at lower speeds, would have the potential for increasing crashes, as seen in detail in the *Traffic Analysis Technical Memorandum*. Traffic calming measures and other design considerations could be considered for the remaining local roadways, as necessary or desired.

MS-2: Noise will be evaluated as part of the preliminary engineering and detailed environmental studies (National Environmental Policy Act [NEPA]) phase of the project development process. During this phase, PennDOT will conduct a Preliminary Design Highway Traffic Noise Assessment for the proposed alternatives. State and Federal Guidelines require PennDOT to use a standardized process to identify locations where abatement is potentially warranted, feasible, and reasonable considering peak hour noise levels and the potential effectiveness of noise abatement measures. This process includes the following steps:

1. Identify land uses within the project area that are sensitive to noise, such as homes and parks.
2. Monitor existing noise levels and develop acoustical models to predict future conditions.
3. Evaluate predicted future noise levels after the highway project is constructed and identify locations where noise impacts are anticipated.
4. Consider noise abatement where noise impacts are anticipated.
5. Identify areas where preliminary noise abatement is potentially warranted, feasible, and reasonable.

Step 3 in the noise process would include consideration of the predicted traffic volumes and composition (e.g., car and truck). If it is determined that noise levels exceed the identified thresholds and abatement is warranted, feasible, and reasonable, PennDOT would typically abate traffic noise by installing noise walls that are voted on by the local neighborhood relative to implementation, design, and color.

Truck traffic noise caused by the use of compression release brakes, or 'Jake Brakes', is not effectively reduced through the use of concrete noise barriers and it has been found that compression release brake noise is best addressed by local legislation and strict enforcement of that legislation.

MS-3: PennDOT cannot mandate truck routes on state roads unless there is physical limitation along the roadway (e.g., bridge weight restriction) or safety concerns (e.g., tunnels). As a result, the industry decides route choice. Additionally, the ability and right to make I-76 toll free for trucks is beyond the purview of PennDOT and this PEL Study. Those types of endeavor would require approval by the Pennsylvania Turnpike Commission and state legislature.

MS-4: As stated in the PEL Study, multimodal improvements, such as bicycle and pedestrian improvements, could be included as part of the Build Alternative, where appropriate. Additionally,

it is not PennDOT's intent to preclude local communities from developing and advancing bicycle facilities. As the Build Alternative corridors advance into preliminary engineering and detailed environmental investigations, PennDOT will continue to meet with local officials to discuss and coordinate multimodal access.

MS-5: The PEL Study specifically identified the PA 45 at Willowbrook Drive/Rockey Ridge Drive intersection as a location where potential improvements should be considered. When/if that project advances, detailed geometric design and full safety analysis would be completed. Additionally, the PEL Study also recommended the advancement of a potential safety study along PA 45 to evaluate the need for improvements involving other design elements such as shoulder widths, intersection geometry, sight distance, pedestrian/bicycle accommodations, and access management. This intersection would be included in this safety study analysis as well.

Commenter: Steff, Jim

March 15, 2023

Mr. Dean Ball, PE  
70 PennDOT Drive  
Clearfield, PA 16830

Dear Mr. Ball,

Thank you for giving me the opportunity to provide comments on the State College Area Connector Planning and Environmental Linkages (PEL) Report.

**Comment 1: As recommended by the Harris Township Board of Supervisors a fourth option should be included – Identify and construct safety improvements along the Route 322 right of way.**

The three options proposed in the study will reshape Harris and Potter Townships as to harm the safety and well being of its residents by:

1. Significantly increasing the volume of truck traffic traveling through the most densely population part of Centre County.
2. Significantly increasing air pollutions levels and possibility bringing Centre County out of compliance with the federal regulations.
3. Significantly increasing traffic noise at all hours of the day.
4. Likely increasing the level of crime as often occurs when rural areas are infiltrated with road corridors that make it easier to commit crime
5. Significantly increasing the opportunities for chemical spill leaks as more trucks hauling hazardous compounds enter the county.
6. Adversely impacting many residents whose homes, properties and businesses will be ruined by governmental takings. We know, personally, families that will have their farms taken and businesses closed.

JS-1

**Comment 2: Add a fifth routing alternative that gives traffic the opportunity to go directly to Interstate 80 instead of channeling all traffic through the Centre Region.**

Because the desired destination of most of the truck traffic is Interstate 80 an option should be included that addresses that traffic need. Previously, PennDOT had identified three options what would provide a direct route for vehicles and trucks to reach Interstate 80. PennDOT eliminated all three alternatives. It is mighty suspicious to me that the

JS-2



Intestate 80 options are out in the report. Their elimination sends the clear message that the study is not objective but rather serves as a smoke screen to justify a ruinous interstate road that bisects the State College area for the purpose of expediting Penn State University special event traffic and to creating opportunities for outside commercial interests to develop our valley.

JS-2

In no way is this report objective or open when the alternatives of making safety improvements within the existing right of way or providing a route to Interstate 80 are not included. To me that is a fatal flaw.

**Comment 3: Should one of the three options advance to construction, their connections to Route 45 should be eliminated. Route 45 is a mess now especially during peak hours. Currently, often residents of Willowbrook neighborhood wait 10 or 15 minutes to exit their development in the morning because of very heavy traffic volumes. Also some of the homes are built very close to the road. Adding interstate traffic to his mix would make the situation much worst for them.**

JS-3

**Comment 4: To me, the highest priorities for preservation in the corridor are Colyer Lake, access points to the Rothrock State Park, and Tussey Mountain which is the only location in the area where kids can learn to ski.**

JS-4

**Comment 5: Using sensitive design concepts suitable for a parkway rather than an interstate highway might mitigate some of the negative impacts on a very beautiful rural gateway to the Centre Region.**

JS-5

Thank you for asking for comments and for considering my concern.

Sincerely,

Jim Steff

## Response:

JS-1: At the start of the PEL Study, a range of alternatives were identified and evaluated. One of those alternatives was the upgrade of existing US 322. This alternative included four lanes, a paved median with concrete barrier separation (18' total median), and full-width shoulders (12'). The upgrade of existing US 322 alternative included access-controlled lanes, with at-grade intersections and left hand turn alternative concepts (jughandle turnarounds) strategically located to maintain local road network connectivity and access. Jughandles were considered during this evaluation as they could be located to minimize the land area impact to adjacent properties

compared to other possible designs such as roundabouts. The design speed for this alternative was 55 MPH. All the proposed design parameters for this alternative would meet current design criteria.

Under this alternative evaluation, potential environmental impacts and traffic analysis were assessed. From an environmental perspective, the upgrade of existing US 322 alternative was found to have the highest potential impacts to residential units. It also had the highest potential impact on commercial businesses (non-agricultural businesses) and had high potential impacts on PA Core Habitat Areas (protected habitat that could support threatened and endangered species). The alternative would also impact the most structures on the National Register of Historic Places with the highest potential impact on known archaeological sites and high probability for archaeology areas. From a traffic perspective, the upgrade alternative was determined to have 17% of total traffic (AADT) and 21% of truck traffic (AADTT) migrate to the upgraded US 322 alternative from the remaining local road network (e.g., PA 45, PA 144). With the reductions in traffic volume on the local roadway network in the study area, this alternative was found to improve overall study area traffic operations. A safety analysis was also conducted for this alternative. The findings indicated that an upgrade to US 322 as defined reduced safety on US 322 (89% increase in all crashes and 39% increase for fatal and injury crashes) when compared to the existing conditions along current US 322. These analyses were presented at the April 2022 public meetings in Boalsburg and Centre Hall. During subsequent analysis, the upgrade of existing U322 alternative was dismissed from further study because it would not improve overall safety on the network. Therefore, it would not meet the purpose and need of the PEL Study.

While it may at first appear that the upgrade alternative is not as impactful from a community perspective compared to new location build alternatives, the required right-of-way necessary to widen the existing roadway to accommodate additional lanes, turn arounds/turn lanes, and meet current design standards, impacts on community features are actually higher as development has occurred along the existing roadway. The PEL Study found that the upgrade alternative would not meet the need for the project as it would negatively impact safety along US 322 compared to existing conditions and would have high impacts on residential and commercial units in the area. As a result, Build Alternative options were advanced for further development and study.

As the PEL Study concludes and the Preliminary Engineering Design activities of the PEL Study recommended alternatives begin, PennDOT and FHWA are committed to working with local officials and the public to provide context sensitive solutions and minimize impacts to the local community and surrounding environment.

JS-2: This PEL Study was designed to identify transportation solutions that best address transportation needs for the entire study area. For this study, it was determined that a Build Alternative would provide the best opportunity to meet these needs. Both the US 322 and the PA 144 Build Alternatives showed safety improvements with respect to predicted crashes on all the existing US 322, PA 45, and PA 144 (see the *Traffic Analysis Technical Memorandum for the State College Area Connector Planning and Environmental Linkages Study* Table 15). However, the PA 144 Build Alternatives had high impacts on productive agriculture, water resources, endangered species terrestrial habitat, and Section 4(f) National Register of Historic Places

(NRHP) properties. Additionally, each 144 Build Alternative had high engineering costs and from a community impact perspective, would impact the public water supply well protection zones for Potter Township and Centre Hall Borough area, and current and future area mining operations. As a result, it determined that based on the environmental, planning, and engineering factors that the US 322-1S, US 322-1OEX, and US 322-5 alternatives would provide the best opportunity to minimize overall impacts while addressing the stated needs.

JS-3: PennDOT understands the concerns of the community regarding the PA 45 connector. PennDOT is committed to conducting more detailed traffic analyses to evaluate the US 322 to PA 45 connection with current traffic and crash data. Under any of the Build Alternative scenarios (US 322-1OEX, US 322-1S, or US 322-5), should the traffic analyses indicate that a connector is necessary to improve mobility and aid the State College Area Connector project in meeting the defined transportation purpose and need, PennDOT will include the US 322 to PA 45 connection. PennDOT will work with Potter Township and area residents to minimize impacts to the surrounding community. Additionally, should the associated analysis show that the Build Alternative, with the connector, adversely impacts conditions on PA 45, PennDOT would incorporate necessary improvements into the project. Conversely, if the analyses determines that a US 322 to PA 45 connection is not necessary to improve mobility and aid the State College Area Connector project in meeting the defined transportation purpose and need, the connection will be removed from the project. In summary, further traffic analysis will be conducted during the preliminary engineering and detailed environmental phase of the transportation project development.

JS-4: Rothrock State Forest and Colyer Lake are located south of the currently proposed Build Alternative corridors. Therefore, no potential direct impacts to the associated trails are anticipated. Maintaining access to the Tussey Mountain amenities, Rothrock State Forest trails, and other recreational areas beyond the proposed Build Alternative corridors will be investigated and assessed during preliminary engineering and detailed environmental studies (National Environmental Policy Act [NEPA]) phase.

JS-5: While the parkway concept is not being advanced as outlined in JS-1, PennDOT will continue to work with the local communities to advance the project and include context sensitive measures, accordingly. Additionally, as detailed field studies progress through the NEPA phase of the project, the preliminary proposed corridors can be adjusted as necessary to avoid and further minimize impacts to resources.

**Commenter:** Stetson, Jeff

-----Original Message-----

From: Marlene Stetson [REDACTED]  
Sent: Thursday, February 16, 2023 5:01 PM  
To: Ball, Dean D <deball@pa.gov>  
Subject: [External] State College Connector project.

Hello Mr. Ball,

A majority of the commercial truck traffic on Route 322 near State College is traveling from the populated areas around southeastern PA /Northern MD and Virginia to the populated areas of northern Ohio/Chicago/Detroit, etc. or the reverse direction. In speaking with commercial truckers 322 is the preferred route to avoid tolls on the PA Turnpike. It's common knowledge that the PA Turnpike and the Commission overseeing it is a repository for political favors and nepotism but that's no excuse for not doing the right thing and eliminating the Turnpike Commission and folding the Turnpike into PennDot. If tolls were eliminated or reduced on the Turnpike for commercial traffic, causing a shift in traffic from 322 to the Turnpike, would this change the direction of the State College Connector project?

JS-1

JS-2

Thank you and all the best,

Jeff Stetson  
Boalsburg, PA

## Response:

JS-1: As summarized in the PEL Study and further explained in the *Traffic Analysis Technical Memorandum*, an origin and destination study was conducted at the start of the study to understand existing travel patterns and travel demand, and to aid in traffic forecasting. Essentially, this study provided insight on where vehicles traveling on the study area road network are coming from or going to. Figures 2 through 6 of this technical memorandum illustrate how various vehicle types are traversing in the area. For example, nearly 59% of heavy truck trips headed west on US 322 are destined to points west on I-80 (e.g., Erie, Chicago, etc.) and 8% of heavy truck trips headed west on US 322 are destined to points south on I-99 (e.g., Altoona, etc.). This information was included in the alternative screening process for this PEL Study and used to support the decision-making process.

JS-2: The ability and right to make I-76 toll free and roll the Pennsylvania Turnpike Commission into PennDOT is beyond the purview of PennDOT and this PEL Study. Those types of endeavors would require approval by the Pennsylvania Turnpike Commission and state legislature.

**Commenter:** Swim, Janet

**From:** Janet Swim [REDACTED]  
**Sent:** Monday, February 20, 2023 6:14 PM  
**To:** Ball, Dean D <deball@pa.gov>  
**Subject:** [External] Comment about SCAC Draft PEL Study Report

First, I did not see anything about mitigating the effects of different routes. I'm particularly concerned about the need for a sound barrier at and around 322 and Bear Meadow road (intersection 4 on several of the maps. Last time we were told that it depended on whether there was a need, It was feasible, It was "reasonable"

As I've said before,

- 1) if an assessment says there is no need in this area, there is a problem with the assessment. Not only will there be an increase in traffic volume, but the last two major constructions along 322 have increased traffic volume and noise, meaning that taken as a whole, changes to 322 are having a cumulative effect.
- 2) If it isn't feasible, then there is something wrong with the engineering.
- 3) I assume "reasonable", I think I'm being reasonable. I assume "reasonable" is code for "cost-effective". If it is prioritized, then it the costs is worth the effort.

JS-1

Second, I would also like to know the proposed mitigation of environmental damage by different alternatives.

JS-2

Third, there appears to be a discounting of public transportation options in the report. This seems shortsighted when thinking about the future need for innovative transportation solutions to address the climate change contribution from the transportation sector.

JS-3

Janet

--

Janet K. Swim, Ph.D.  
Professor of Psychology  
The Pennsylvania State University  
University Park, PA 16802

[REDACTED]  
<http://swimlab.weebly.com/>

## Response:

JS-1: Noise will be evaluated as part of the preliminary engineering and detailed environmental studies (National Environmental Policy Act [NEPA]) phase of the project development process. During this phase, PennDOT will conduct a Preliminary Design Highway Traffic Noise Assessment for the proposed alternatives. State and Federal Guidelines require PennDOT to use a standardized process to identify locations where noise abatement is potentially warranted, feasible, and reasonable considering peak hour noise levels and the potential effectiveness of noise abatement measures.

PennDOT Publication 24 Project Level Highway Traffic Noise Handbook defines noise abatement determinations as a three-phased approach. The following provides a high-level summary of the criteria definitions. Warranted criteria assesses if predicted noise levels approach or exceed the noise abatement criteria defined by FHWA for various land uses (e.g., residential criteria are 67 dB(A) exterior) or increase existing noise level by 10 dB(A) or more. Feasible criteria evaluates if a 5 dB(A) reduction in noise can be achieved at 50% or more of the impacted receptors and lastly can a barrier be constructed without causing a safety issue, restricting vehicular/pedestrian travel, along with wall and utilities maintenance access while providing adequate drainage. Reasonable criteria for noise barriers evaluate the Maximum Square Footage of Abatement Per Benefited Receptor (MaxSF/BR) value of 2,000.

Overall, the Noise analysis study process includes the following steps:

1. Identify land uses within the project area that are sensitive to noise, such as homes and parks.
2. Monitor existing noise levels and develop acoustical models to predict future conditions.
3. Evaluate predicted future noise levels after the highway project is constructed and identify locations where noise impacts are anticipated.
4. Consider noise abatement where noise impacts are anticipated.
5. Identify areas where preliminary noise abatement is potentially warranted, feasible, and reasonable.

Step 3 in the noise process would include consideration of the predicted traffic volumes and composition (e.g., car and truck). Additionally, highway traffic noise is typically abated by installing noise walls that are voted on by the local neighborhood relative to implementation, design, and color. Noise wall design is determined during final design activities.

JS-2: As design advances, PennDOT will consider design solutions that aid in minimizing the footprint of the proposed facility, thus minimizing the overall impacts. Additionally, the identification of conceptual mitigation will begin during the preliminary engineering and detailed environmental phase of project development and be coordinated with the resource agency and the public. The mitigation will be designed to address impacts from the proposed project.

JS-3: Transit was an alternative considered in the PEL Study process. Through the alternative screening process, it was determined that alternatives (e.g., transit only or bicycle and pedestrian improvements) that do not address the movement of both personal automobiles and freight trucks would not meet the transportation needs in the area. Essentially, the alternative screening determined that three Build Alternatives would best meet the identified needs while minimizing potential impacts to the natural and built environment. A qualitative evaluation of air quality (which includes greenhouse gas (GHG) and Climate Change) will be completed for the remaining State College Area Connector project alternatives as part of the NEPA analysis.

**Commenter:** Will, Amy

**From:** Amy Will [REDACTED]  
**Sent:** Wednesday, March 15, 2023 9:18 PM  
**To:** Ball, Dean D <deball@pa.gov>  
**Subject:** [External] SCAC comment

Hi Mr. Ball,

I believe that the 322-5 road option would destroy the natural area around my neighbors' pond (Erskine and Willie Cash). They have created a nature sanctuary there by keeping humans away as much as possible so that the wildlife can flourish. As a result, we have watched as the wildlife living near and visiting the pond has increased dramatically since we first moved here in 2004. While there has always been a red tailed hawk or two living by the pond (some years we have seen young hawks, too), we have had kestrels off and on over the years, too. In addition to the red tailed hawks, there is currently a pair of kestrels living here (we see them every day). Most excitingly, in recent years we have had bald eagles and owls become regulars. The owls are now here all the time, as I hear them almost every evening. While I don't see the eagles very often, they are either living by the pond or visiting regularly as I do see them every other month or so. Additionally, we have a wide range of woodpecker varieties all of the time - downy, hairy, and red bellied, as well as flickers occasionally. We also see blue herons and geese visiting the pond. There are many, many smaller birds which are all around here, and we also always see them going back and forth from the pond to our property or our other neighbors' property. These include bluebirds, tree swallows, barn swallows, red winged blackbirds, robins, blue jays, nuthatches, juncos, goldfinches, chickadees, tufted titmice, purple finches, cedar waxwings, meadowlarks - and more.

There have always been deer but currently there is a decent sized herd of deer which we see in and around the pond multiple times daily, including at least eight does all of the time and a few bucks that come and go. There are always fawns every year.

Every year we hear many spring peepers and bullfrogs at the pond.

We regularly see flocks of turkeys, a few foxes coming and going from the pond, and have also (less often) seen bobcats and porcupines. We have seen and heard evidence of coyotes, so we suspect they, too, visit the pond. We have also had more than one snapping turtle traveling through our property.

I am no expert, so I know that I have missed things and am forgetting even some of the animals I've seen regularly around the pond, but there is no question that it is a vital resource in this area. Although it is a relatively small resource, it is evident that the animals regularly travel between the pond and Colyer Lake. That would become impossible if the 322-5 option is built, and I believe that the pond and much of this area will be abandoned by all of this wildlife if the road is built in this location.

Thank you for your consideration,  
Amy Will

**Response:**

AW-1: Thank you for the information. More detailed habitat studies will be completed during the preliminary engineering and detail environmental studies (National Environmental Policy Act [NEPA]) phase of the project and potential impacts will be assessed. Mitigation measures will be considered during design to reduce adverse effects to wildlife. These could include incorporating

AW-1

wildlife crossings/corridors in the roadway design to allow wildlife to travel between existing viable habitats.