

# ENVIRONMENTAL INTEGRATION

Transportation projects can have environmental impacts. Federal guidelines require MPOs to consult with state and federal resource regulatory agencies. The MPO maintains an environmental resource inventory that is used early in the project development process to identify potential project impacts on environmental resources. The early resource inventories and agency consultation during transportation planning can help to avoid potential delays in project delivery and minimize potential changes in project scope that may result in project cost increases.

Transportation projects in Berks County can face a range of complex, interrelated environmental and community issues. These often relate to the National Environmental Policy Act (NEPA) of 1969. NEPA is the ‘umbrella’ law that directs agencies to consider impacts to environmental resources specifically regulated by other federal and state laws, such as:

- Section 4(f) of the U.S. Department of Transportation Act, which requires consideration of impacts to publicly owned parks and recreation lands, wildlife and waterfowl refuges, and historic properties.
- Section 6(f) of the Land and Water Conservation Fund Act, which requires consideration of impacts to grant-assisted public recreation lands.
- Section 7 of the Endangered Species Act, which requires consideration of impacts to threatened and endangered species.
- Section 106 of the National Historic Preservation Act, which requires consideration of impacts to historic resources.
- Section 404 of the Clean Water Act, which requires consideration of impacts to wetlands and waters of the United States.
- PA Chapter 93, which sets water quality standards for waters of the Commonwealth.
- The Farmland Protection Policy Act, which aims to prevent the conversion of prime and unique farmland soils into non-agricultural uses.

Linking transportation and environmental planning is achieved through two types of consultation. The first concerns comparing transportation plans with natural and cultural resource information that is discussed in detail below. RATS will be involved in efforts aimed at ‘Linking Planning and NEPA’ (LPN) during the project development process. Additionally, RATS will be involved throughout the PennDOT Connects process, which involves collaboration with state, MPO, and local government representatives early in the project development process to identify potential environmental, community, and technological issues that could impact project scopes and cost estimates. The goal of these efforts is to develop a better understanding of transportation problems and related environmental characteristics of proposed transportation projects earlier to produce a realistic project scope of work that encompasses all of the relevant design and environmental issues.

The second type of required consultation concerns mitigation activities. Federal law mandates that long-range metropolitan transportation plans must include a discussion of types of potential environmental mitigation activities and areas to carry out these activities, including activities that may have the greatest opportunity to restore and maintain the environmental functions affected by the plan. This discussion is to be developed in consultation with federal, state, tribal, wildlife, land management, and regulatory agencies.

The L RTP includes projects expected to be constructed by 2050. The plan provides maps of common environmental features and historic areas and general mitigation strategies. The identification of environmentally sensitive areas and historic sites and the strategies are intended to provide for the long-term protection of these areas and properties.

The BCPC, RATS and state agencies conduct regional data collection, and as a result, maps of the most common environmental features and historic sites have been developed. The maps included in this section identify the location of the following features:

- Hydrology Network (surface waters, wetlands, and floodplains) (Map 14)
- Steep Slopes (Map 15)
- Prime Agricultural Soils (Map 16)
- County Greenway Network (Map 17)
- Natural Heritage Areas, Important Bird Areas, and Trout Streams (Map 18)
- Easements and Agricultural Zoning (Map 19)
- Historic Resources Listed on the National Register (Map 20)

While the responsibility for implementing environmental mitigation largely rests with PennDOT and local municipalities, both BCPC and RATS will continue to facilitate information sharing about potential mitigation locations, techniques, and best practices. RATS will continue to assist District 5-0 with finding suitable sites for a ‘seasonal wetland’ bank, where applicable, inside the county or other regional mitigation strategies. A ‘seasonal wetland’ bank is a wetland area that has been restored and protected to provide compensation for impacts to wetlands. These banks are established to generate environmental credits that can be used or sold to offset unavoidable wetland losses, ensuring that wetland functions are maintained even after development or other impacts occur. RATS will continue working with the BCPC and the Pennsylvania Historical and Museum Commission (PHMC) in identifying historic sites in Berks County.

Mitigation can be defined by the order of process sequencing as:

- Avoiding the impact altogether.
- Minimizing impacts by limiting the degree or magnitude of the action and its implementation.
- Rectifying the impacts by repairing, rehabilitating, or restoring the affected environment.
- Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action.
- Compensating for the impact by replacing or providing substitute resources or environments.

**There are generally two categories of mitigation activities:**

## **Best Management Practices (BMPs)**

BMPs are existing policies, practices, and measures required by law, regulation, or policy that reduce the environmental impacts of designated activities, functions, or processes. Although they mitigate potential impacts by avoiding, minimizing, or reducing/eliminating impacts,

BMPs are distinguished from mitigation measures because BMPs are 1) existing requirements for the proposed action, 2) ongoing, regularly occurring practices, and 3) not specific to a proposed project. In other words, they are inherently part of the proposed action and are not additional mitigation measures proposed because of the NEPA environmental review process for the proposed action. The primary purpose of using BMPs in Berks County is through stormwater management – to protect beneficial uses of water resources through the reduction of pollutant loads and concentrations, and through reduction of discharges (volumetric flow rates) causing stream channel erosion.

### Mitigation Measures

Mitigation measures are additional, project specific measures proposed because of the NEPA environmental review process. Mitigation measures may be routinely applied across many transportation projects but are often determined on a project-by-project basis. The following table identifies the number of projects that could have a potential impact on a variety of environmental features.

The focus of this LRTP is asset management and maintenance first, with limited, capacity improvement projects and right-of-way acquisition. The majority of projects identified in this LRTP will likely not require substantial mitigation efforts. Measures can be taken to avoid, minimize, rectify, reduce, or compensate for project-specific impacts identified during the environmental review of the proposed project. If any, small, project specific actions will occur at individual project locations.

To get a better understanding of how projects in this plan may affect these natural features, RATS inventoried environmental features within 250 feet of each project.

In Pennsylvania, the Agency Coordination Meeting (ACM) is a forum where regulatory and resource agencies meet on a regular basis to discuss potential issues on various transportation projects (typically projects that require Environmental Impact Statements [EIS]), as well as review potential environmental concerns related to projects identified within the LRTP. Presentation of the LRTP and/or project-level impacts are at the discretion of PennDOT. This LRTP was presented to the ACM on December 10, 2025. The agencies were in agreement with the processes used by the MPO to identify environmental resources and provided additional guidance and resource links to expand our efforts.

