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PENNSYLVANIA STATE ASSOCIATION OF TOWNSHIP SUPERVISORS

August 28, 2009

Glenn C. Rowe, P.E., PTOE
Acting Director
Bureau of Highway Safety and Traffic Engineering
Pennsylvania Department of Transportation
P.O. Box 2047
Harrisburg, PA 17105-2047

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INDEPENDENT TOWNSHIP SUPERVISORS

Dear Mr. Rowe:

We have reviewed the proposed regulations to Title 67, Chapter 233, Transportation Enhancement Grants from Automated Red Light Enforcement Revenues, which would provide grants for the use of revenues generated from the automated red light enforcement system. The revenues generated from fines paid by violators of 75 Pa.C.S. 3112(a)(3) are to be used for projects that involve improvements to highway safety or mobility.

Although it is not clear in the proposed regulations, this proposal would be applicable for not only Philadelphia, but also for all other municipalities in the state when the General Assembly grants general authority to use an automated red light enforcement system. With that being said, we offer the following comments:

- Since only Philadelphia can use an automated red light enforcement system under current law, is the grant system as proposed limited to Philadelphia? Or could other municipalities throughout the state apply for funding? Whether the program is limited to only Philadelphia or expanded to the entire state, this point should be made clear in the proposal.
- Section 233.8, Grant selection process and criteria. This section stipulates that applications filed within the application period (*between June 1st and June 30th*) will be considered for funding during the next fiscal year. We presume that the next fiscal year begins on July 1st of the same year the applications were received. What is not clear is how long does the department will have to review the applications and make their decision. Depending on the scope of work stipulated in the application and the time lag of the department, the construction season could be over. We suggest that a specific time frame be placed in the regulations for the department's determination so that the applicants will have some idea of the timetable.

Finally, we would like to be on record in support of the intent of the proposed regulations.

Sincerely,

Elam M. Herr
Asst. Executive Director

cc: James M. Smith, IRRC