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YCPC COMMENTS
PROPOSED RULEMAKING
PA DEPARTMENT OF TRANSPORTATION
RAIL FREIGHT GRANTS
SEPTEMBER 2014

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1. §511.4(d)(3), Page 8 of 14 - Can the proportion of the RTAP grant funding permitted for railroad crossing maintenance or reconstruction be applied to the same crossing project or projects programmed by the local MPO on its TIP?
2. §511.6.(a) - A brief explanation should be provide about becoming a business partner in the Department's "dotGrant" program.
2. §511.8, Page 9 of 14 - The word "objections" should be changed to "objectives."
3. §511.8.(a)(3)(i -vi), 9 of 14 - The following applies:
 - a. We gather that "creating" new rail service can refer to constructing new rail lines where none exist. In this case, the construction of new rail corridor must receive approval by the Federal Railroad Administration (FRA) before such grant application for funding can be considered by the Department.
 - b. Should the MPO's and RPO's also be obligated review these applications, based on the MPO/RPO Long Range Plan? If so, should a review form be developed either locally or at the state level to evaluate these projects?
 - c. ***Positively affecting the environment:*** must additional air quality analysis be conducted by the local MPO's/RPO's to justify its/their project/projects?
 - d. What source of information or analysis can be collected or conducted, respectively, to justify improved public safety benefits. Crash inventory and analysis for major truck corridors? Pedestrian issues? Other?
 - e. What type of economic development information would aid the project applicant in justifying the economic benefits of the project or projects submitted through this process? Economic surveys developed by the local Economic Development Corporation/Chamber of Commerce? County or municipal comprehensive plans? Marketing studies for the individual projects?
 - f. Our MPO members, state legislators and other associated parties have written letters of endorsement for local freight rail projects submitted through this program for more than fifteen years. Could local endorsement of these projects serve as another factor to meet the applicant's MPO/RPO criteria?

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4. §511.8.(e)

The Department should include the MPO Intermodal Management System (IMS) Coordinator in all project site visits.