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PENNSYLVANIA FOREST  
PRODUCTS ASSOCIATION

## Pennsylvania Forest Products Association

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March 28, 2016

Richard N. Roman, PE, Director  
Pa Department of Transportation  
Bureau of Maintenance and Operation  
400 North Third Street, 7<sup>th</sup> Floor  
Harrisburg, PA 17120

RE: Pa. Bulletin (46 Pa.B. 991) - Hauling in Excess of Posted Weight Limits

Dear Mr. Roman:

I am writing regarding the Pennsylvania Department of Transportation's proposed rulemaking titled "Hauling in Excess of Weight Limit," recently published in the Pennsylvania Bulletin. As you are aware, PFPA has been involved with the Department and others since early 2014 on these changes to Title 67 Pa. Code, Chapters 189 and 190. We appreciate the work that the Department has done and the additional opportunity to comment on the proposed rules.

The Pennsylvania Forest Products Association is the principal trade organization for the forest products industry operating in the Keystone State. Pennsylvania has about 2,100 companies and more than 60,000 employees involved in the forest products industry, most of which depend upon the harvesting of timber from the forests in the state.

We would like to submit the following comments on this proposed regulation.

We support the proposal's identification of log stockpile facilities as a "permanent forest product processing mill" in the definition.

We concur with the proposal's identification of "at-risk permits" not requiring a Department stipulation during the freeze-thaw period. The use of at-risk permits is contingent upon the ongoing operations of an unconventional oil and gas development on a bonded road. In this situation, the risk to the road is being covered by the unconventional oil and gas development according to its desire to operate on the road at this time.

We suggest that the identification of other Chapters of the Pa. Code within the rule be identified by its full description, such as 67 Pa. Code, Chapter 190 or 67 Pa. Code, Chapter 179, to eliminate any potential confusion.

Thank you for the opportunity to comment on this proposed rulemaking and consideration of these issues. If you have any questions, please contact me at your convenience.

Sincerely,

Paul Lyskava  
Executive Director

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