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PENNSYLVANIA OFF HIGHWAY VEHICLE ASSOCIATION

The Voice of Off Road Riding in Pennsylvania

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February 20, 2018

Alex MacDonald
Chief
Trails, Greenways, and Statewide Planning Section
Bureau of Recreation and Conservation
Department of Conservation and Natural Resources.

By email

Dear Alex:

The purpose of this letter is to comment on the Department's proposed grant in aide rulemaking as published in the Pennsylvania Bulletin last month. We are pleased to endorse the Department's work on these regulations and support their adoption as written.

During the last 15 months, PaOHV has repeatedly advanced that a final form regulation needs to expressly define two grant application and award periods consistent with Act 97 of 2016. This proposed rule fully embraces our recommendation. We commend the Department for defining the application and award periods in such concise terms.

Similarly, we have recommended that the regulations have no specificity regarding matching funds. On November 14, 2016, I wrote to DCNR Legislative Liaison Jen Shade saying, "It makes sense to us (PaOHV) that the Department have the same latitude in motorized grants as it does in others. Therefore, we strongly urge the Department to remove the language in the draft regulation which addresses matching funds. Removal of this language will allow the Department and stakeholders the maximum opportunity to address trail development needs more nimbly. The Department should be free of encumbrances that stifle creativity and lock in barriers unnecessarily for the program."

It is evident from the proposed rule that the Department agrees with this recommendation as well. This is certainly good news.

I should add that the Association supports the Department's selection criteria guide as provided in 53.4 of the proposed rule. These are responsible guidelines as written.

PaOHV supports the proposed rule as submitted and suggests that they be finalized without amendment. Please know that the Association will promote these regulations as they move through the regulatory review process so long as they remain consistent with the proposed rulemaking.

Sincerely,

Donald N. McClure, Jr.
PaOHV Administrator

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