



**2019 NOACA BOARD OF DIRECTORS**

**President**

Valarie J. McCall, Chief, Communications, Government and International Affairs, City of Cleveland

**First Vice President**

Timothy C. Lennon, Geauga County Commissioner

**Second Vice President**

Matt Lundy, Lorain County Commissioner

**Secretary**

John R. Hamercheck, Lake County Commissioner

**Assistant Secretary**

Joseph F. Kozura, Mayor, City of Lorain

**Assistant Secretary**

Michael P. Summers, Mayor, City of Lakewood

**Treasurer**

William F. Hutson, Medina County Commissioner

**Assistant Treasurer**

Andrew Conrad, P.E., P.S., Medina County Engineer

**Assistant Treasurer**

Kirsten Holzheimer Gail, Mayor, City of Euclid

**(Immediate Past Board President)**

Armond Budish, Cuyahoga County Executive

Samuel J. Alaj, Mayor, City of Broadview Heights

Paul Barnett, Service Director, City of Brunswick

Annette M. Blackwell, Mayor, City of Maple Heights

Pamela Bobst, Mayor, City of Rocky River

Jeff Brandon, Montville Township Trustee

Michael Dylan Brennan, Mayor, City of University Heights

Tanisha R. Briley, City Manager, City of Cleveland Heights

Holly C. Binda, Mayor, City of Elyria

Ben Capelle, General Manager, Lakeland

Kenneth P. Carney, Sr., P.E., P.S., Lorain County Engineer

Jerry C. Crino, Lake County Commissioner

Dennis Clough, Board President, GCRTA

Freddy L. Collier, Jr., Director, City of Cleveland Planning Commission

Timothy J. DeGeeter, Mayor, City of Parma

Michael W. Dever, MPA, Director of Public Works, Cuyahoga County Department of Public Works

Kyle Dreyfuss-Wells, Chief Executive Officer, NEORSO

James W. Dvorak, Geauga County Commissioner

William D. Friedman, President and CEO, Cleveland-Cuyahoga County Port Authority

Michael D. Gammella, Mayor, City of Brook Park

James Gillis, P.E., P.S., County Engineer, Lake County

Blaine A. Griffin, Councilman, Ward 6, City of Cleveland

Richard Heidecker, Columbia Township Trustee

John D. Hunter, Mayor, Village of Sheffield

Susan K. Infield, Interim Director & Manager, Special Initiatives, Cuyahoga County Planning Commission

Frank G. Jackson, Mayor, City of Cleveland

Martin J. Keane, Councilman, Ward 17, City of Cleveland

Lori Kokoski, Lorain County Commissioner

Dale Miller, Cuyahoga County Councilman

John Picur, P.E., District Deputy Director, ODOT, District 12

David H. Roche, Mayor, City of Richmond Heights

Ralph Spidaleri, Geauga County Commissioner

Matthew L. Spronz, P.E., PMP, Director of Capital Projects, City of Cleveland

Robert A. Stefanik, Mayor, City of North Royalton

Ron Young, Lake County Commissioner

Matt Zane, Cleveland Council, Ward 15

**Ex Officio Member:**

Kurt Prinic, District Chief, Northeast District, Office, Ohio Environmental

**Executive Committee Members**

Grace Gallucci, NOACA Executive Director

January 7, 2020

Office of Secretary Elaine Chao  
Docket Management Facility  
U.S. Department of Transportation  
1200 New Jersey Avenue  
1200 New Jersey Avenue SE  
West Building Ground Floor  
Room W12-140  
Washington, DC 20590-0001

RE: Docket Number DOT-OST-2019-0165

To Whom It May Concern:

I am writing to comment for the record in response to the request for comments published in the Federal Register/Docket Number DOT-OST-2019—165/Non-Traditional and Emerging Transportation Technology (NETT) Council.

The Northeast Ohio Areawide Coordinating Agency, the federally designated metropolitan planning organization (MPO) for Greater Cleveland, has entered into a public-private partnership with HyperloopTT to develop Great Lakes Hyperloop, a hyperloop route from Cleveland to Chicago and Pittsburgh. A recently released preliminary feasibility study has provided ample cost benefit analysis to support continued development of this project. Based on NOACA's work on this transformative project, we believe the NETT Council can play a significant role in its advancement.

Progress on this and presumably other hyperloop projects will continue to be hampered by the lack of national standards and a regulatory structure that provides consistency and uniformity. The engineers who are developing hyperloop technology, as well as the investors who provide funding, will be unable to move forward without clear national standards. Leading the development of such standards is an ideal role for the NETT Council.

Just as our highway, railway, aviation, and transit systems are guided by standard federal rules and regulations, the time has come to develop similar standards for hyperloop technology. The creation of uniform standards will facilitate the eventual development of a network of interconnecting hyperloops routes across the country. In the same way that railroad tracks can accommodate any conventional train, hyperloop should be no different. Any hyperloop tube (guideway) should be able to accommodate any pod.

1299 Superior Ave., Cleveland, Ohio 44114-3204 Phone: 216-241-2414 FAX: 216-621-3024

Web: [www.noaca.org](http://www.noaca.org) [noaca.org](https://www.facebook.com/noaca.org) [@noaca\\_mpo](https://twitter.com/noaca_mpo)

Furthermore, I would recommend that the NETT Council develop these standards in coordination with the international hyperloop community. U.S. hyperloop companies -- as well as the American manufacturing sector and our nation's workforce -- will certainly benefit from the ability to export technologies and products to other countries.

In addition to regulations regarding standardization and uniformity, hyperloop projects require clear guidance in several other areas, including but not limited to passenger safety, environmental impact, and right-of-way acquisition. And I would recommend that among all these important issues, safety should always be the top priority. In order for the traveling public to accept this (or any) new form of transportation, the NETT Council should ensure that safety is top-of-mind.

Finally, the NETT Council should consider what the federal government's role should be in encouraging the further development of hyperloop technology and projects. I encourage the Council to create a framework that will encourage hyperloop research and development, and allow worthwhile projects to move forward. Toward that end, the Council should develop a fair and reasonable approach to eligibility for federal programs and grant dollars.

Hyperloop projects have the potential to transform cities and regions by vastly improving travel for both people and freight. Hyperloop could provide transportation that is faster, safer, cleaner, more cost-efficient, and more energy-efficient than current modes of travel. As such, it is important that the U.S. Department of Transportation's NETT Council develop the regulatory framework necessary for the advancement of hyperloop technology. Project sponsors, public agencies, project engineers, and project funders all require a consistent, reliable set of standards in order to move forward on this promising new technology.

Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read 'Grace Gallucci', written in a cursive style.

Grace Gallucci  
Executive Director  
Northeast Ohio Areawide Coordinating Agency  
1299 Superior Avenue  
Cleveland, OH 44114  
216-241-2414