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September 19, 2007

Wendell F. Holland Chairman Pennsylvania Public Utility Commission P.O. Box 3265 Harrisburg, PA 17105-3265

### Re: Public Testimony on the Proposed Trans-Allegheny Interstate Line, Docket Number A-110172

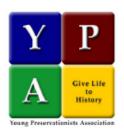
Dear Chairman Holland:

The Young Preservationists Association of Pittsburgh (YPA) welcomes this opportunity to provide comments to the Pennsylvania Public Utility Commission on the proposed Trans-Allegheny Interstate Line 500 kV project.

My comments today are designed to provide an overview of how our organization views the impact of the proposed high voltage transmission line on historic, cultural, and scenic resources. YPA believes that the proposed power line will have a negative impact on these resources—what we call "community assets"—and will hinder the region's ability to retain and attract young people.

The Young Preservationists Association of Pittsburgh (YPA) was established in 2002 as the only organization in the United States committed to the participation of young people in historic preservation. YPA collaborates with organizations throughout southwestern Pennsylvania to present educational seminars, tours, and special events, conduct research, and advocate for preservation of the Pittsburgh region's history. The mission of Young Preservationists Association of Pittsburgh is the participation of young people in the preservation of historic resources.

YPA's events and publications resonate with young people. More than 1,000 people have participated in our education programs, events, tours, research, and partnerships. YPA is more than 350 members strong from 19 states, working to engage the next generation in historic preservation. YPA operates in the nine-county southwestern



Pennsylvania region that includes the following counties: Allegheny, Armstrong, Beaver, Butler, Fayette, Greene, Indiana, Washington, and Westmoreland.

YPA was established with the idea that who we are trying to attract to our profession is as important as the buildings we are trying to save. Demographic trends play an increasingly important role in the future viability of organizations, communities, and how regions compete for young, well-educated workers. YPA sees the preservation and reuse of the region's historic resources as a competitive advantage to keep and attract more young people. Through our events, publications, and tours, YPA sends a message to young people that history is worthy of investment and revitalization.

### History's Significance in Washington and Greene Counties

In the 1850s, nine male slaves escaped from Cyrus Ross, a slave owner and trader in Clarksburg, West Virginia. Ross tracked them to Blacksville, West Virginia where they had met Elisha Purr, a free black Underground Railroad conductor who stood up to Ross and threw rocks at the posse. From there, they headed for Waynesburg, Pennsylvania, where they met Ermine Caine, a free black barber, in Hamilton Hotel (now Mickey's Men's Store in Waynesburg), then moved on to Samuel Jewell's place. They took a circuitous path to Carmichaels, then Rogersville, West Finley, Washington, Canonsburg, and, finally, Pittsburgh. There were several methods of escape, including on foot, in wagons, on railroads, on steamers, canoes and schooners, and even in containers.

I share this tidbit of history because it is stories like these that give life to Washington and Greene counties and make them unique and authentic places to live. Washington and Greene counties played an integral role in the Underground Railroad, a vast network of people who helped fugitive slaves escape to the North and to Canada prior to the Civil War. The Underground Railroad was so effective, it is believed, that between 1810 and 1850, the South lost 100,000 slaves to northern states.

One of the best-preserved examples of the Underground Railroad is the LeMoyne House in the City of Washington, Pennsylvania's first National Historic Landmark of the Underground Railroad (there are only 64 existing Underground Railroad sites listed by the National Park Service).





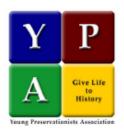
The Lemoyne House, built in 1812.

The stately stone house in downtown Washington, PA, was built in 1812 by John Julius LeMoyne, the father of Francis Julius LeMoyne. Both father and son were practicing physicians, but it was the courageous Francis Julius LeMoyne who, despite the strict Fugitive Slave Law of 1850, risked his personal freedom and fortune to take a stand against the institution of slavery. This successful 19th century doctor, reformer, and builder of the first crematory in the western hemisphere, opened his home and properties as stops along the Underground Railroad.

It is sites like these that make Washington and Greene counties unique and give them an authentic flavor. Unfortunately, sites like these could be compromised with the current high voltage transmission line project.

### Southwestern Pennsylvania as part of a National Energy Framework

There is another story to tell, and it is about our future that, if it isn't carefully planned, could negatively impact our unique past. Just as we have become "addicted to oil," in President Bush's words, we have become slaves to electricity. It has become an accepted fact of life. But little concern has been given to how our energy and communications needs impact historic resources.



In particular, cell phone towers have proliferated in recent years, springing up in rural areas, scenic viewsheds, and even national parks. In 2001, an 80-foot cell phone tower was erected in Yellowstone National Park, half the height of Old Faithful. The project was highly criticized, in part, because the tower was originally planned to be 40 feet tall. In contrast, the proposed towers that are to carry the transmission line through Washington and Greene counties are to be between 98 and 125 feet high!

According to the National Trust for Historic Preservation, "when Congress passed the Telecommunications Act of 1996, it allowed the construction of cell towers on federal lands. But the act stipulated that 'use of the Washington Monument, Yellowstone National Park or a pristine wildlife sanctuary, while perhaps prime sites for an antenna and other facilities, are not appropriate and use of them would be contrary to environmental, conservation, and public safety laws."

More towers are on the way across the country. Congress passed a provision of the Energy Policy Act of 2005 directing the U.S. Department of Energy to create a process for designating large geographic areas as "National Interest Energy Transmission Corridors" (NIETC). The designation, while ambiguously defined, is intended to reduce congestion by facilitating construction of new transmission infrastructure. The proposed NIETC corridors would cover broad areas of Virginia, West Virginia, Maryland, Pennsylvania, New York, New Jersey and Delaware.

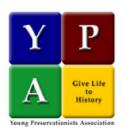
These new and untested provisions of the Energy Policy Act promote "fast-track" citing approval that could bypass state-level processes for locating transmission infrastructure, override federal environmental laws, and enable federal condemnation of private land for new high voltage transmission lines.<sup>2</sup>

It is largely because of these types of proposed high voltage energy lines that the National Trust for Historic Preservation listed "Historic Places in Transmission Line Corridors" in their annual listing of "America's 11 Most Endangered Sites" for 2007.

Construction of new high voltage transmission lines within the proposed NIETCs risks direct, indirect and cumulative harm to historic, cultural and archaeological resources. For example, the National Park Service has identified at least 55 National Parks and 14 heritage areas within the proposed Mid-Atlantic NIETC corridor, which also

<sup>&</sup>lt;sup>1</sup> Margaret Foster, "Height of Yellowstone Cell Phone Tower Questioned," Preservation Online, Mar. 18, 2004, <a href="http://www.nationaltrust.org/magazine/archives/arc\_news/031804p.htm">http://www.nationaltrust.org/magazine/archives/arc\_news/031804p.htm</a>.

<sup>&</sup>lt;sup>2</sup> National Trust for Historic Preservation, "America's 11 Most Endangered Places 2007," <a href="http://www.nationaltrust.org/11most/05.html">http://www.nationaltrust.org/11most/05.html</a>.



encompasses African-American historic sites, numerous scenic rivers and byways, and the nation's greatest concentration of Civil War battlefields.

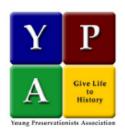
Unfortunately, this fast-track approval process is likely to preclude meaningful federal protection for historic resources as mandated by the National Historic Preservation Act and National Environmental Policy Act. It will also undermine the work of generations of local residents and elected officials to protect the corridors' historic character and natural beauty for all Americans.

Of greater concern is the US Department of Energy's plan to create a federal eminent domain zone across more than 200 Mid-Atlantic counties including 50 in Pennsylvania, according to the Pennsylvania Land Trust Association<sup>3</sup>. Allegheny Power has applied to the Department of Energy to include the Trans-Allegheny Interstate Line Project as part of the NIETC. <sup>4</sup> From a property-rights point of view, the proposed high transmission line would render property owners in Washington and Greene counties powerless.

In this context, southwestern Pennsylvania is part of a larger energy scheme. The Dominion/Allegheny High Voltage Transmission Line Corridor, which would, according to the Piedmont Environmental Council, create a proposed 500-kilovolt transmission line, with 160-foot towers and a 200-foot right of way, that could scar the landscape for 240 miles from southern Pennsylvania, through West Virginia, and ending in Loudoun County, Virginia. See map at end of this testimony for affected areas.

<sup>&</sup>lt;sup>3</sup> Pennsylvania Land Trust Association website, <a href="http://conserveland.org/pp/Transmission/index">http://conserveland.org/pp/Transmission/index</a>.

<sup>&</sup>lt;sup>4</sup> Allegheny Energy filing with the U.S. Dept. of Energy, March 6, 2006, <a href="http://www.oe.energy.gov/DocumentsandMedia/allegheny.pdf">http://www.oe.energy.gov/DocumentsandMedia/allegheny.pdf</a>.



## The TrAIL Project's Impact on Historic and Scenic Resources in Southwestern Pennsylvania

YPA shares the concern that vast transmission line corridors would destroy the integrity of communities and scenic, historic and natural landscapes including parks, battlefields, important bird habitats and protected open spaces. Worse still, in pursuing construction of these high transmission lines, the U.S. Department of Energy would undercut existing federal law such as the National Environmental Policy Act and the National Historic Preservation Act by imposing new processes and procedures inconsistent with those laws.

There should be greater concern about and scrutiny over the corridor's impact on historic resources. The NIETC corridor overlaps with the **Rivers of Steel National Heritage Area** and all of its resources. Created by Congress in 1996, the Rivers of Steel National Heritage Area is committed to preserving, interpreting, and managing the historic, cultural, and natural resources related to the steel industry as well as its related industries. Encompassing 3,000 square miles in the seven counties of Allegheny, Armstrong, Beaver, Westmoreland, Greene, Fayette, and Washington, the Rivers of Steel is building on the transition from heavy industry to high technology and diversified services.

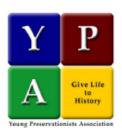
The Rivers of Steel National Heritage Area is, according to the Washington County Comprehensive Plan, "a benefit to Washington County" that will "help to bolster the new regional economy by promoting tourism and economic development based on the industrial saga of the Monongahela Valley and Washington County."<sup>5</sup>

It is important to note that there are a large number of historic sites listed or eligible for listing on the National Register in Greene and Washington counties. In the nine-county southwestern Pennsylvania region, Washington County has the second most sites listed or eligible for listing on the **National Register of Historic Places**, with 299 historic sites. Greene County has 66. Between these two counties, they comprise more than a fifth of the nine-county region's National Register historic sites.<sup>6</sup>

In addition, the proposed transmission line will cross the nation's first road, the **National Road**, or Route 40, which runs through Washington County. The National Road was designated a National Historic Civil Engineering Landmark in 1976 and a State Heritage Park in 1994. Along the 90 miles of road in Pennsylvania, 79 sites have been deemed eligible for listing on the National Register of Historic Places. Of those, many have

<sup>&</sup>lt;sup>5</sup> Washington County Comprehensive Plan, November 23, 2005, p. 46, Section 2-9, <a href="http://www.co.washington.pa.us/downloads/Washington">http://www.co.washington.pa.us/downloads/Washington</a> County Comprehensive Plan.pdf.

<sup>&</sup>lt;sup>6</sup> Pennsylvania Historical and Museum Commission, Bureau for Historic Preservation, 2006.



already been nominated. In 1995 the Road was designated a State Scenic Byway and it received the National Scenic Byway "All-American Road" designation in 2002.<sup>7</sup>



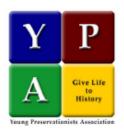
Scenic view from the National Road.

The proposed transmission line will not only negatively impact the scenic and historic beauty of Washington and Greene counties, it will mar the cultural landscape, as well. According to the National Park Service, "One kind of cultural significance a property may possess, and that may make it eligible for inclusion on the National Register, is traditional cultural significance. 'Traditional' in this context refers to those beliefs, customs, and practices of a living community of people that have been passed down through the generations, usually orally or through practice."

Historic sites, then—even those not listed or eligible for listing on the National Register, but could be—must be considered part of the cultural landscape that is at risk with the proposed transmission line.

<sup>&</sup>lt;sup>7</sup> National Road Heritage Corridor website, <a href="http://www.nationalroadpa.org/historical\_qualities.html">http://www.nationalroadpa.org/historical\_qualities.html</a>.

<sup>&</sup>lt;sup>8</sup> National Register Bulletin #38, "Guidelines for Evaluating and Documenting Traditional Cultural Properties," <a href="http://www.nps.gov/history/nr/publications/bulletins/nrb38/nrb38.pdf">http://www.nps.gov/history/nr/publications/bulletins/nrb38/nrb38.pdf</a>.



Several historic sites within the affected area include **Marianna**, **West Bethlehem Township**, the **Village of Fordyce**, and the **Warrior Trail**. In Marianna, West Bethlehem Township, the community was a model for the coal mining industry as they were building the coal patch town for the miners. The Village of Fordyce is an archetypical small farming community with its one church, one schoolhouse, one store, one post office surrounded by acres of farmland. In August 2007, the Morris Farm homestead near Fordyce was recognized by PA Agriculture Secretary Dennis Wolff as a bicentennial farm as part of the state's Century and Bicentennial Farm Program. The Warrior Trail, a former Native American path believed to have been in use for more than 5,000 years, goes through this tiny community in Greene County.

In addition, the TrAIL high voltage power line would affect numerous recreation areas, including the Mount Morris to the Monongahela, Crucible, Catawba, and Greene River hike & bike trails and State Game Land #223 in Greene County.

Historic sites are not just pretty to look at; they have an economic value, as well. According to the Washington County Comprehensive Plan, "over the years, the appeal of historic buildings has gained in popularity and several efforts across the county are spearheading the preservation of period architecture. The Washington County Historical Society, Washington County History and Landmarks Foundation, and other local historical organizations contribute to the preservation of the historical significance of the county and are instrumental in cataloguing significant places, events, people, and artifacts." <sup>12</sup>

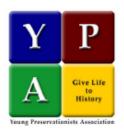
The City of Washington has one of the largest and most vibrant Main Street programs in Pennsylvania. The **Main Street Program** has proven to be a reliable generator of jobs and economic vitality for small towns. In just the first two quarters of 2007, there were 605 jobs created, 870,453 building rehabilitations, and \$129,083,344 in private investment in 65 Main Street communities across Pennsylvania, including Washington.

<sup>&</sup>lt;sup>9</sup> Judith Florian, "Continuing On After Disaster: the Town of Marianna," <a href="http://freepages.family.rootsweb.com/~florian/towns/marianna">http://freepages.family.rootsweb.com/~florian/towns/marianna</a> pa 1.htm.

<sup>&</sup>lt;sup>10</sup> Gretchen McKay, "Home amid history: The Morris family has owned and worked its Bicentennial Farm for more than 200 years. Kathleen Morris Miller has done the legwork to prove it," *Pittsburgh Post-Gazette*, September 16, 2007, http://www.post-gazette.com/pg/07259/817286-58.stm.

<sup>&</sup>lt;sup>11</sup> Greene County Department of Recreation website, <a href="http://www.co.greene.pa.us/secured/gc/depts/rec/tourinfo/grt.htm">http://www.co.greene.pa.us/secured/gc/depts/rec/tourinfo/grt.htm</a>.

<sup>&</sup>lt;sup>12</sup> Washington County Comprehensive Plan, p. 48.



### Why Young People Matter

It is clear that southwestern Pennsylvania has a lot of history and scenery, but so what? Well, it matters because that's one thing that young people are looking for. Southwestern Pennsylvania's historic and natural resources are the one thing that no other place on earth possesses, and that's a unique selling point when trying to attract young people. Construction of a massive high voltage power line that negatively impacts historic and scenic resources will put southwestern Pennsylvania at a competitive disadvantage when trying to attract and retain young talent to the region.

National patterns of settlement and housing demonstrate that young people are making different choices than previous generations. A report published by CEOs for Cities, called "The Young and the Restless in a Knowledge Economy," notes that "today's 25- to 34-year-olds are about one-third more likely to live in neighborhoods within three miles of a region's downtown than are other Americans. Close-in neighborhoods with higher density, mixed uses, walkable destinations, lively commercial districts and interesting streets can make a region more competitive for talented workers. ... Those regions that lack vibrant close-in urban neighborhoods will be at a disadvantage in attracting and retaining talent." <sup>13</sup>

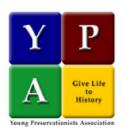
Young, well-educated and creative people want a special sense of place to live, work, and play. Preservation of place is what numerous writers—such as Jane Jacobs, Tony Hiss, and Richard Florida—claim will ultimately lead to a region's economic, social, and political growth. As Florida says in his book, *Rise of the Creative Class:* 

The nation's geographic center of gravity has shifted away from traditional industrial regions toward new axes of creativity and innovation. The Creative Class is strongly oriented to large cities and regions that offer a variety of economic opportunities, a stimulating environment and amenities for every possible lifestyle. . . . These places offer something for everyone—vibrant urban districts, abundant natural amenities and comfortable suburban "nerdistans" for techies so inclined. 14

Why do young people matter to old communities? Young people give life to old neighborhoods, they bring new ideas and energy, they are willing investors, and young people make regions globally competitive. They are also entrepreneurial. A report by the

<sup>&</sup>lt;sup>13</sup> Joseph Cortright, "The Young and Restless in a Knowledge Economy," CEOs for Cities, December 2005, p. 5

<sup>&</sup>lt;sup>14</sup> Richard Florida, *The Rise of the Creative Class: And How It's Transforming Work, Leisure, Community and Everyday Life, Basic Books, 2002.* 



Coro Center for Civic report notes that "eighty percent of new businesses are started by people under the age of 39." <sup>15</sup>

### The Pittsburgh Region's Preservation Challenges

But while Sunbelt regions and other areas to which young people are gravitating are investing in their core cities, southwestern Pennsylvania is doing the opposite. Here in western Pennsylvania there are a number of regional preservation challenges that hurt the region's ability to attract young people who desire a better standard of living. These challenges include sprawl, urban abandonment, vacant properties, and the loss of our region's valuable cultural history. How is the Pittsburgh region to compete with other parts of America—and the world—if we cannot preserve a critical competitive advantage: our history?

The Pittsburgh region continues to develop land in spite of population declines, creating what Brookings scholar Bruce Katz calls "the worst sprawl problem in the United States." Thomas Hylton writes in the *Post-Gazette*, "315 square miles of land in southwestern Pennsylvania -- an area nearly six times the size of Pittsburgh -- were urbanized from 1982 to 1997, even as the region lost 166,000 residents." <sup>16</sup>

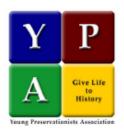
Outside of Pittsburgh, sprawl along with a lack of investment and neglect continue to take a costly toll on the region.

- According to 10,000 Friends of Pennsylvania, the state lost over 1 million acres of cropland, forest, and open space in just five years (1992-1997), ranking number two in the nation (after Texas) in conversion of total acres of land to development.<sup>17</sup>
- In the Pittsburgh area between 1970 and 1990, vehicle miles traveled (VMT) per person increased by over 90%, average trip length increased from about seven miles per trip to 10 miles per trip, and VMT per household increased by over 60%.
- Annual transportation costs for the Pittsburgh region in 1990 were approximately \$9,000 for rural households, \$5,000 for suburban households, but only \$2,500 for urban households.

<sup>&</sup>lt;sup>15</sup> "Young People in the Pittsburgh Region: A Data Snapshot from the 2000 Census," Coro Center for Civic Leadership, April 2003.

<sup>&</sup>lt;sup>16</sup> Thomas Hylton, "Forum: Want lower taxes? Stop sprawl," *Pittsburgh Post-Gazette*, June 18, 2006 (http://www.post-gazette.com/pg/06169/698972-109.stm, website visited on June 18, 2006).

<sup>&</sup>lt;sup>17</sup> "Executive Summary of the Study on the Costs of Sprawl in Pennsylvania," conducted by Clarion Associates, Inc. Prepared for 10,000 Friends of Pennsylvania and Sponsoring Organizations, January 2000.



 "Paving Our Way to Water Shortages: How Sprawl Aggravates Drought" ranked the Pittsburgh area 14th among the 312 metropolitan areas studied in the amount of water lost to sprawl.<sup>18</sup>

It should be no surprise, then, that the region's most valuable historic landmarks remain at risk.

For instance, the 1802 Meason House in Fayette County, a National Historic Landmark, is threatened by encroaching development and loss of its rural historic context.<sup>19</sup>

One casualty of this suburban development is the neighborhood school, hundreds of which are being abandoned at an alarming rate across Pennsylvania. "In recent decades, hundreds of distinctive neighborhood schools have been closed across the commonwealth, only to be replaced with generic mega-schools to which students are bused," writes Thomas Hylton.<sup>20</sup>

#### Conclusion

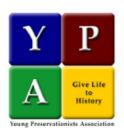
In response to the increased risks of high voltage power lines and their impact on historic and scenic resources, a national coalition of historians, conservationists and those concerned with energy efficiency are mounting efforts to help change the political and corporate climate of building more power plants and transmission lines rather than seeking sustainable solutions. It's time to consider a broader range of options to meet energy needs before causing irreparable harm to exceptional historic and environmental resources.

YPA believes the proposed Trans-Allegheny Interstate Line 500 kV project will have a negative impact on historic, cultural, and scenic resources in Washington and Greene counties. This negative impact will hurt southwestern Pennsylvania's chances for attracting a new generation who is looking for that unique sense of place. A landscape scarred with 125-foot towers does not send a welcoming message to young people, or people of any age, seeking to make the Pittsburgh region their home.

<sup>&</sup>lt;sup>18</sup> Ann McFeatters, "Pittsburgh 14th in water lost to sprawl. Study finds that development diverts water, worsens drought," *Pittsburgh Post-Gazette*, August 29, 2002 (<a href="http://www.post-gazette.com/healthscience/20020829sprawl0829p5.asp">http://www.post-gazette.com/healthscience/20020829sprawl0829p5.asp</a>, website visited on June 18, 2006).

<sup>&</sup>lt;sup>19</sup> Marylynne Pitz, "Can Fayette County's historic Meason House be saved?" *Pittsburgh Post-Gazette*, June 23, 2002.

<sup>&</sup>lt;sup>20</sup> Thomas Hylton, "Schools and the city fabric," *Pittsburgh Post-Gazette*, February 11, 2006, <a href="http://www.saveourlandsaveourtowns.org/PostGazette021106.html">http://www.saveourlandsaveourtowns.org/PostGazette021106.html</a>.



YPA urges you to reject the proposed Trans-Allegheny Interstate Line 500 kV project.

Sincerely,

Dan Holland Founder and Chair Young Preservationists Association of Pittsburgh