

August 5, 2020

VIA EFILING

Rosemary Chiavetta, Secretary
PA Public Utility Commission
Commonwealth Keystone Bldg.
400 North Street
Harrisburg, PA 17120

**Re: Application of Transource Pennsylvania, LLC Filed Pursuant to 52 Pa. Code Chapter 57 Subchapter G, for Approval of the Siting and Construction of the 230kV Project in Portions of Franklin County, Pennsylvania
Docket No. A-2017-2640200**

**Petition of Transource Pennsylvania, LLC for a finding that a building to shelter control equipment at the Rice Substation in Franklin County, Pennsylvania is reasonably necessary for the convenience or welfare of the public
Docket No. P-2018-3001878**

**Petition of Transource Pennsylvania, LLC for a finding that a building to shelter control equipment at the Furnace Run Substation in York County, Pennsylvania is reasonable and necessary for the convenience or welfare of the public
Docket No. P-2018-3001883**

**Application of Transource Pennsylvania, LLC filed Pursuant to 52 Pa. Code Chapter 57, Subchapter G, for Approval of the Siting and Construction of the 230kV Transmission Line Associated with the Independence Energy Connection-East Project in Portions of York County, Pennsylvania
Docket No. A-2017-2640195**

**Application of Transource Pennsylvania, LLC for approval to acquire a certain portion of lands of various landowners in York and Franklin Counties, Pennsylvania for the siting and construction of the 230 Kv Transmission Line associated with the Independence Energy Connection – East and West Projects as necessary or proper for the service, accommodation, convenience or safety of the public
Docket No. A-2018-3001881, et al.**

Dear Secretary Chiavetta:

Enclosed for filing on behalf of Stop Transource Franklin County as admitted into the record at the July 9 evidentiary hearing in the above-referenced matter, please find Stop Transource Franklin County's Exhibit 26. Copies will be served as indicated on the Certificate of Service.

Respectfully submitted,

CERTIFICATE OF SERVICE

Consolidated Docket Nos. A-2017-2640200 and A-2017-2640195

I hereby certify that a true and correct copy of the foregoing communication of Intervenor, Stop Transource Franklin County has been served upon the following persons, in the manner indicated, in accordance with the requirements of 52 Pa. Code § 1.54 (relating to service by a participant).

VIA E-MAIL & FIRST CLASS MAIL

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By: _____
JOANNA A. WALDRON

Date: August 5, 2020

Rosemary Chiavetta, Secretary
PA Public Utility Commission
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Joanna A. Waldron, Esq.
CURTIN & HEEFNER LLP
Counsel for Stop Transource Franklin County

JAW:alr
Enclosure

cc: The Honorable Elizabeth Barnes (letter and COS only)
Certificate of Service (letter and COS only)
John Kelly, Strehlow & Assoc. (via email)



May 21, 2020

Ms. Brandy Harris
Senior Cultural Resources Specialist/Historian
Burns McDonnell
8911 N. Capital of Texas Highway, Building 3
Austin, TX 78759

RE: ER 2017-1949-055-T; PUC: Ringgold to Rice Transmission Line; Franklin County;
REVISED Above Ground Historic Resources Determination of Effects

Dear Ms. Harris,

Thank you for submitting information concerning the above referenced project. The Pennsylvania State Historic Preservation Office (PA SHPO) reviews projects in accordance with state and federal laws. Section 106 of the National Historic Preservation Act of 1966, and the implementing regulations (36 CFR Part 800) of the Advisory Council on Historic Preservation, is the primary federal legislation. The Environmental Rights amendment, Article 1, Section 27 of the Pennsylvania Constitution and the Pennsylvania History Code, 37 Pa. Cons. Stat. Section 500 *et seq.* (1988) is the primary state legislation. These laws include consideration of the project's potential effects on both historic and archaeological resources.

Proposed Project

The proposed project includes approximately 25 miles of new 230 kV double circuit overhead transmission line that will connect a new substation (Proposed Rice Substation; ER No. 2017-1949-055-D) to the existing Ringgold substation near Smithsburg in Washington County, Maryland.

Archaeological Resources

Based on the information received and available within our files, in our opinion, no archaeological resources will be affected by the proposed project. Should project plans change and/or should you encounter archaeological resources during construction, please contact Mark Shaffer at mshaffer@pa.gov or (717) 783-9900.

Aboveground Resources

Identification of Historic Properties

Based on the additional information received, the proposed project has the potential to affect two identified historic properties.

The John Snider Farm (Key No. 210661) was determined eligible for listing in the National Register of Historic Places (National Register) in 2019, under Criterion A in the area of Agriculture, as the property represents changes over time for the Great Valley agricultural region. The period of significance begins ca. 1820 and ends ca. 1970, to coincide with the built environment on the property that retains sufficient integrity and conveys the agricultural significance. The proposed boundary includes the entire 116.8-acre tax parcel.

The Southeast Franklin County Rural Historic District (Key No. 210638) was determined eligible for listing in the National Register in 2019. The proposed period of significance extends ca. 1730, the date of initial settlement, through 1969 (50 years from the time of the determination).

Although the name and boundary need to be refined, for the purposes of the project and assessing effects, the National Register-eligible boundary of the Southeast Franklin County Rural Historic District extends south from the previously identified Greene Township-Conococheaque Rural Historic District (Key No. 103455, determined not eligible) as far as and possibly beyond the Maryland state line and includes at the very least, all of the limits of the proposed transmission line to the east and west.

Determination of Effect

We concur with the findings that the proposed project will result in an **Adverse Effect** to the National Register-eligible John Snider Farm (Key No. 210661) and the Southeast Franklin County Rural Historic District (Key No. 210638). Current plans for the proposed project include the construction of an approximately 0.46-mile section of new location transmission line through active agricultural land at the southeast corner of the Snider property in addition to the potential construction of three, 130'-tall transmission structures on the property in active agricultural land. Current project plans include approximately 11.3 miles of proposed transmission line within the rural historic district. Although approximately 9.1 miles of the line will parallel existing transmission lines, at least two miles would be entirely new lines constructed within the rural historic district.

Consideration of Minimization and Avoidance Efforts

We understand that the development of the current proposed route has been an iterative process, with modifications made throughout the siting analysis due to input from agencies, landowners, stakeholders, and adjustments to the overall route network. Specific to historic above ground resources, we understand that efforts have been made to route and site facilities and associated easements as close to existing transmission lines as possible. Construction access will be limited to existing roads to the extent practicable and temporary access and work areas will be developed for construction as needed. Areas will be restored following construction. Trees and vegetation clearing will be as limited as possible; and the current design calls for tubular monopoles vs steel lattice towers at the preference of 120 of the 122 comments received due to various reasons, including less of a footprint, less visually obtrusive, and easier to farm around.

Resolution of Adverse Effects

We appreciate that Transource has provided potential mitigation efforts developed in consultation with our "5 Steps to Meaningful Mitigation Outcomes." We generally agree with the measures outlined. In our opinion, these measures are appropriate in that they focus on public benefit and preservation-related activities. The mitigation agreed upon should be captured in an agreement document signed by Transource, our office, and the preservation organization(s), as detailed below. These mitigation measures include the following, with our comments provided *in italics*:

- Formal definition of the boundaries of the NRHP-eligible Southeast Franklin County Rural Historic District (PHMC Key No. 210638) to support future development projects, preservation planning, and SHPO review efforts. *We agree with this mitigation effort with clarification that the boundaries proposed should be supported by text and mapping. This documentation can be provided in a memo format to be appended to the existing documentation. An inventory of contributing and non-contributing properties within the boundaries should also be prepared and provided.*

- Monetary donation to a group invested in local preservation activities to facilitate preservation of significant historic properties in the project vicinity. Two such organizations

with preservation-oriented missions were identified within the vicinity of the subject properties. These include the Franklin County Historical Society (FCHS) and the Waynesboro Historical Society (WHS). Transource proposes a one-time payment of \$7,500 to each organization. *We agree with this mitigation effort with the request that additional consideration should be given to providing a monetary donation also to the statewide Historic Barn and Farm Foundation, a non-profit organization that also assists in documenting and educating the public on the history, importance, and maintenance of historic farms, barns, and related outbuildings. Transource and/or an applicant working on their behalf, should coordinate with these organizations to identify specific preservation outcomes that the mitigation funds would go towards. These outcomes should then be outlined in the aforementioned mitigation agreement that is signed by Transource, our office, and the organization(s) receiving the specified funds.*

Please note if a federal permit is required or if federal funding is utilized, the federal agency, or those acting on their behalf, will need to continue to consult with our office, as well as identify and consult with other preservation stakeholders and notify the Advisory Council on Historic Preservation, pursuant to 36 CFR Part 800.

For further information concerning this review and/or future consultation, please contact Emma Diehl at emdiehl@pa.gov or (717) 787-9121.

Sincerely,



Douglas C. McLearn, Chief
Division of Environmental Review