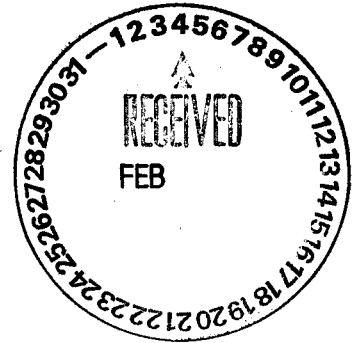




Pennsylvania
Historical & Museum
Commission

Chris
Doug



January 25, 2010

Ms. Mary Conturo, Executive Director
Sports and Exhibition Authority of
Pittsburgh and Allegheny County
Regional Enterprise Tower
425 Sixth Avenue, Suite 2750
Pittsburgh, PA 15219

RE: Pennsylvania History Code process, Pittsburgh Civic Auditorium (Mellon Arena) and Lower Hill
Redevelopment project

Dear Ms. Conturo:

Thank you for inviting our staff to the first interested parties meeting for the Mellon Arena project on January 19th. Bill Callahan represented the Bureau for Historic Preservation/State Historic Preservation Office on behalf of the Pennsylvania Historical & Museum Commission. This letter is intended to comment on the meeting itself and to summarize our understanding of the process and timing SEA has chosen to follow for this project.

We understand the Arena project is currently required to follow the Pennsylvania History Code process for state undertakings, as there is no known federal involvement which would invoke Section 106 of the National Historic Preservation Act. We understand further, however, that the SEA has chosen to follow the procedures as defined for Section 106 undertakings excluding, of course, participation by the Advisory Council on Historic Preservation or a Federal agency that would be responsible for oversight of the process.

In our opinion, this is a prudent and laudable step. By following the Section 106 template, SEA could reduce or avoid potentially significant project delays should federal assistance become available thereby necessitating the Section 106 process be "caught up." Additionally, Section 106 procedures are much more defined than those in the state History Code, which should help maintain additional clarity in the process. We encourage the SEA to continue in this manner as much as possible.

The SEA will be selecting "interested parties" to participate in the project consultation process. As stated in the public meeting, we encourage SEA to maintain broad selection criteria for interested parties, and to allow for a broad definition of "demonstrated interest" in the project. We also respectfully request the SEA allow us to review and comment on a preliminary list to ensure all parties known to the PHMC who may be interested in the process are included.

We also suggest that in future meetings, the term "interested parties" not be made interchangeable with the term "consulting party." These terms have different meanings in Section 106 review and, since SEA is following the Section 106 template, should not be made interchangeable in the context of this project. In addition, it would be a good idea to be certain that any individual, business or organization that would be granted legal *consulting* party status under Section 106 is included in those who participate as "interested parties."

Additionally, it appeared as though future meetings will be held primarily during the work day. To maximize public input at least some future meetings should be planned understanding that many interested parties are unable to consistently attend meetings held during regular working hours. In our opinion, meetings of this nature are more inclusive and useful if held in the evening or on weekends. It was mentioned during the presentation that much information will be posted on your website. In our view, posting plans, meetings minutes, and comments on your website as you move through the process for all to access is also a good idea.

During the January 19 meeting, a target goal of six months was stated for completion of the consultation process. It is our hope the process will be completed in that time; however in our view it would be prudent to be aware that six months is quite an aggressive time frame for a project of this nature and scope.

Also during the meeting a "project purpose and need exercise" was handed out to all attendees. Attendees were then requested to rank and interpret each of eleven criteria as to their importance to the consultation process and to the community. In our opinion, this exercise presents significant problems on two fronts.

First, the History Code and certainly Section 106 do indeed provide for and encourage a variety of perspectives *as they pertain to the effects of an undertaking on historic resources*. The ranking mechanism provided at the meeting treats a large variety of commendable community themes as competing interests. "Preservation" competes for ranking with "community cohesion," "sustainability," and "compatible planning" as separate issues when, indeed, these issues are highly compatible. Please keep in mind that the purpose of Section 106 and the History Code is, essentially, to find ways to avoid adverse effects to historic resources while investing in new community development opportunities.

Second, without a great deal of subsequent outreach and education, this type of ranking mechanism will create factions amongst interested parties. One outcome of the public participation process should be to assist the public in understanding how seemingly disparate components of community development are not just compatible, but dependant upon each other for success. "Ranking" exercises such as the one distributed on the 19th result in just the opposite: a compartmentalization of competing interests. Our suggestion is to simply scrap this well-meaning but potentially destructive "ranking" mechanism, and focus on soliciting public input in a manner that allows for a meaningful understanding of the community development needs of the Hill community and the public at large.

Given the information we have received to date in our opinion the SEA's investigation of potential significant archeological resources coupled with the system of monitoring suggested at the meeting is adequate.

Finally, we were very pleased to learn that the demolition of the former Civic Auditorium, now known as Mellon Arena, is not considered inevitable by the SEA. In order for the process to not be construed a sham by the public, that is an extremely important concession. In our opinion Mellon Arena is, literally, an exceptionally significant historic resource. Generally speaking, if they are less than fifty years old, only properties with exceptional significance are considered eligible for the National Register of Historic Places.

In our view, Mellon Arena typifies a classic era of American civic architecture, on the order of Seattle's Space Needle, the St. Louis Gateway Arch and Houston's Astrodome. Certainly, in terms of Pittsburgh's architectural and engineering history, the former Civic Auditorium stands out as

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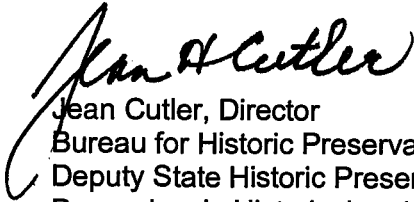
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exceptionally significant. We are, however, also quite cognizant of the Arena's less palatable history; as a physical reminder of the tremendous damage mid-20th century urban renewal projects did to existing neighborhoods. The story of the destruction of the Lower Hill neighborhood for urban renewal is an important story that should not be forgotten.

If a satisfactory adaptive re-use for the Arena can be found, part of that re-use should be a renewed, ongoing emphasis on interpreting that history in order that we avoid similar mistakes in the future. A development project that includes adaptive re-use of the Arena could be a true monument to the people of the Hill district, to Pittsburgh's history as an industrial giant and to the future development of both the Lower Hill and the city at large as we move into a more sustainable and thoughtful era of development.

Thank you once again for the opportunity to comment on this project. If you have any questions please do not hesitate to call Ann Safley at 717-787-9121 or Bill Callahan at 412-565-3575.

Yours Truly,



Jean Cutler, Director
Bureau for Historic Preservation
Deputy State Historic Preservation Officer
Pennsylvania Historical and Museum Commission

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