

IN THE SUPREME COURT OF PENNSYLVANIA

No. 7 MM 2022

CAROL ANN CARTER, MONICA PARRILLA, REBECCA
POYOUROW, WILLIAM TUNG, ROSEANNE MILAZZO, BURT
SIEGEL, SUSAN CASSANELLI, LEE CASSANELLI, LYNN
WACHMAN, MICHAEL GUTTMAN, MAYA FONKEU, BRADY HILL,
MARY ELLEN BALCHUNIS, TOM DEWALL, STEPHANIE
MCNULTY AND JANET TEMIN,
Petitioners,

v.

LEIGH M. CHAPMAN, IN HER OFFICIAL CAPACITY AS THE
ACTING SECRETARY OF THE COMMONWEALTH OF
PENNSYLVANIA; JESSICA MATHIS, IN HER OFFICIAL CAPACITY
AS DIRECTOR FOR THE PENNSYLVANIA BUREAU OF ELECTION
SERVICES AND NOTARIES,
Respondents.

PHILIP T. GRESSMAN; RON Y. DONAGI; KRISTOPHER R. TAPP;
PAMELA GORKIN; DAVID P. MARSH; JAMES L. ROSENBERGER;
AMY MYERS; EUGENE BOMAN; GARY GORDON; LIZ MCMAHON;
TIMOTHY G. FEEMAN; AND GARTH ISAAK,
Petitioners,

v.

LEIGH M. CHAPMAN, IN HER OFFICIAL CAPACITY AS THE
ACTING SECRETARY OF THE COMMONWEALTH OF
PENNSYLVANIA; JESSICA MATHIS, IN HER OFFICIAL CAPACITY
AS DIRECTOR FOR THE PENNSYLVANIA BUREAU OF ELECTION
SERVICES AND NOTARIES,
Respondents.

**BRIEF OF *AMICUS CURIAE* WILLIAMSPORT/LYCOMING
CHAMBER OF COMMERCE AND GREATER SUSQUEHANNA
VALLEY CHAMBER OF COMMERCE URGING THIS COURT TO
ADOPT WITH ONE MODIFICATION THE SPECIAL MASTER'S
REPORT CONTAINING PROPOSED FINDINGS OF FACT AND
CONCLUSIONS OF LAW SUPPORTING RECOMMENDATION
OF CONGRESSIONAL REDISTRICTING PLAN AND
PROPOSED REVISION TO THE 2022 ELECTION
CALENDAR/SCHEDULE**

Exceptions filed from the February 7, 2022, Report issued by Special Master Judge Patricia A. McCullough of the Commonwealth Court of Pennsylvania, at No. 464 M.D. 2021 and No. 465 M.D. 2021, Containing Proposed Findings of Fact and Conclusions of Law Supporting Recommendation of Congressional Redistricting Plan and Proposed Revision to the 2022 Election Calendar/Schedule

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Date: February 14, 2022

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I. INTEREST OF AMICUS CURIAE¹

The Williamsport/Lycoming Chamber of Commerce (WLCC) has been representing the business community in Lycoming County since 1885. With over 900 members, the mission of the WLCC is to preserve, protect, and defend the free enterprise system through promoting a vibrant business climate and quality of life for the businesses and people of Lycoming County. The Greater Susquehanna Valley Chamber of Commerce (GSVCC), founded in 1921, represents the business community in the Montour, Northumberland, Snyder, and Union counties region. With nearly 700 members, the mission of the GSVCC is to advance the prosperity of its communities, commerce, culture, fellow citizens, and their businesses in the region.

The WLCC and the GSVCC, have a significant interest in the outcome of this case. Their members, some 1,600 combined, employ thousands of Pennsylvania voters who live and work in Lycoming, Union, Snyder, Northumberland, and Montour counties. These members rely on the WLCC and GSVCC to be their voice in matters of public policy affecting the business community. A new configuration of

¹ This brief was written by the undersigned and paid for by the Williamsport/Lycoming Chamber of Commerce and the Greater Susquehanna Valley Chamber of Commerce. Pa.R.A.P. 531(2).

congressional districts that fractures the communities of interest that comprise the region will undermine the effectiveness of the WLCC and GSVCC by requiring them to coordinate on regional issues with multiple members of Congress. As explained herein, this was the problem with the congressional redistricting that occurred following the 2000 census, which split communities of interest in the same region into two separate districts. Moreover, as noted by Judge Patricia McCullough in her Report to this Court: “[I]f an important issue is divided across multiple districts, it is likely to receive diffuse and unfocused attention from the multiple representatives it affects, as each is pulled in other directions by the many other issues confronting their districts. However, if a discrete and unique issue is placed in one district, that representative may familiarize herself with the complexities of the issue and the stakeholders it affects.” Report at 153.

II. SCOPE AND STANDARD OF REVIEW

The Court has plenary jurisdiction over this case, but has appointed Commonwealth Court Judge Patricia McCullough as a Special Master to issue proposed findings of fact and conclusions of law. The Court's standard of review is *de novo*. When addressing findings of fact made by Judge McCullough, while those findings do not bind this Court, the Court "will afford them due consideration, as the jurist who presided over the hearings was in the best position to determine the facts." *Annenberg v. Com.*, 757 A.2d 338, 342-343 (Pa. 2000).

III. QUESTION PRESENTED

Whether this Court should adopt Special Master Judge Patricia McCullough's Report Containing Proposed Findings of Fact and Conclusions of Law Supporting Recommendation of Congressional Redistricting Plan, with the modification that the Court adopt the configuration of the 7th District in the Reschenthaler maps.

[Suggested Answer: Yes]

IV. SUMMARY OF ARGUMENT

The Greater Susquehanna Valley Chamber of Commerce (GSVCC) and the Williamsport/Lycoming Chamber of Commerce (WLCC) represent the business community in Lycoming, Union, Snyder, Northumberland, and Montour counties. These counties, along with their regional partners in Tioga, Sullivan, and Columbia counties, form communities of interest that should be grouped within a single district. While the GSVCC and WLCC urge this Court to adopt the Special Master's Report, they request that this Court use the configuration of the 7th Congressional District contained in the Reschenthaler maps in order to keep these important communities of interest together.

V. ARGUMENT: THE COURT SHOULD ADOPT THE SPECIAL MASTER’S REPORT, BUT MODIFY IT TO ADOPT THE CONFIGURATION OF THE 7TH DISTRICT DEPICTED IN THE RESCHENTHALER MAPS.

The Greater Susquehanna Valley Chamber of Commerce (GSVCC) and the Williamsport/Lycoming Chamber of Commerce (WLCC) are largely in agreement with proposed findings of fact and conclusions of law prepared by Commonwealth Court Judge Patricia McCullough, particularly her rejection of the maps submitted by Carter Petitioners, Governor Tom Wolf, and the Senate Democratic Caucus. The GSVCC and WLCC submit this brief as *amicus curia*, however, to emphasize the importance of the communities-of-interest doctrine, and to express their preference for the configuration of the 7th District depicted in the Reschenthaler maps, which group all of Snyder and Union counties into the same district, along with regional partners Lycoming, Tioga, Sullivan, Northumberland, Sullivan, Columbia, and Montour counties.

A. Communities-Of-Interest Doctrine.

“[W]hen drawing state and local legislative districts, jurisdictions are permitted to deviate somewhat from perfect population equality to accommodate traditional districting objectives, among them, preserving the integrity of political subdivisions, maintaining communities of

interest, and creating geographic compactness.” *Evenwel v. Abbott*, 578 U.S. 54, 59 (2016). As this Court has noted, communities of interest “have shared interests for which they can more effectively advocate when they can act as a unified body and when they have representatives who are responsive to those interests.” *Holt v. 2011 Legislative Reapportionment Com’n*, 38 A.3d 711, 745 (Pa. 2012) (Holt

1). Dean Gormley, whom this Court has cited with approval, stated:

At the same time, states have historically considered a broad range of such imprecise communities of interest (many of which are naturally intertwined) in exercising their sound discretion. They do so to satisfy constituents. They do so to sweep together a host of generally identifiable interest groups that wish to be given a unified voice. This is perfectly healthy and permissible. It is an important aspect of the state's prerogative, when it comes to structuring its own form of government.

Id. at 746 (quoting Gormley, *Racial Mind-Games and Reapportionment*, 4 U.P.A.J.CONST.L. 735, 780-781 (2002)). Dean Gormley has further noted: “[S]chool districts, religious communities, ethnic communities, [and] geographic communities[,] which share common bonds due to locations of rivers, mountains, and highways, and a host of other ‘communities of interest’ are routinely considered by districting bodies in order to construct fair and effective maps.” *Id.*

Judge McCollough strongly embraced the communities-of-interest doctrine throughout her report, bolding her language for emphasis. **“To be an effective representative, a legislator must represent a district that has a reasonable homogeneity of needs and interests; otherwise the policies he supports will not represent the preferences of most of his constituents.”** See Report at 153 (emphasis in original) (quoting *Prosser v. Elections Board*, 793 F.Supp. 859, 863 (W.D. Wis. 1992)). **“[I]f an important issue is divided across multiple districts, it is likely to receive diffuse and unfocused attention from the multiple representatives it affects, as each is pulled in other directions by the many other issues confronting their districts. However, if a discrete and unique issue is placed in one district, that representative may familiarize herself with the complexities of the issue and the stakeholders it affects.”** *Id.* (emphasis in original) (quoting *Hall v. Moreno*, 270 P.3d 961, 971 (Colo. 2012)). Application of this concept, by the reliance of unrebutted expert testimony, is evident throughout Judge McCollough’s proposed findings of fact (Report at 154-161, ¶¶1-28) and conclusions of law (Report at 194, 208, 210, 212; ¶¶ 25, 29, 60,

73, 84). This is most notable in her rejection of proposals to split the City of Pittsburgh into two congressional districts. *See supra*.

B. The Region Represented By The GSVCC And WLCC, Which Includes Lycoming, Snyder, Montour, Northumberland, & Union Counties, Are Communities Of Interest And Should Be Grouped Together.

On October 12, 2021, the Pennsylvania House State Government Committee held a regional public hearing on congressional redistricting. *See Exhibit 1.* Malcolm Derk, Chair of the GSVCC's Government Affairs Committee, testified during the hearing. *Id.* at 18-28. Jason Fink, President and Chief Executive Officer of the WLCC, also testified. *Id.* at 29-33. Because this testimony is part of the legislative record that ultimately resulted in the map contained in HB 2146, which is the map that Judge McCullough is recommending for adoption, the GSVCC and WLCC ask this Court to take judicial notice of this testimony. *See Department of Auditor General v. State Employees' Retirement System*, 836 A.2d 1053 (Pa.Cmwlth. 2003) (holding that Commonwealth Court may take judicial notice of legislative journals).

During his testimony, Mr. Derk testified about the many ways in which Snyder, Union, Northumberland, and Montour counties are tied together. In so doing, Mr. Derk stressed the natural travel patterns and

road systems that give these counties a “united feel.” *Id.* at 21-22. Mr. Derk noted in particular the Route 11/15 corridor, along which residents of these counties work, recreate, and engage in commerce. *Id.*



Mr. Derk also testified about the travel patterns of GSVCC members, which increasingly include travel to Lycoming and Columbia counties. *Id.* at 22. Mr. Derk predicted that these connections will only grow with the completion of the Central Susquehanna Valley Thruway providing connections to Interstate 80. *Id.* Aside from travel patterns, Mr. Derk

pointed to large employers in the area, such as Geisinger and UPMC health systems as well as Bucknell and Susquehanna University, which pull employees from the multi-county region of Lycoming, Columbia, Montour, Union, Snyder, and Northumberland counties. *Id.* at 22. Mr. Derk also pointed to the Central Susquehanna Regional 911 system that covers Snyder, Union, and northern Northumberland counties. *Id.* at 24. Finally, Mr. Derk pointed to other entities – such as Rabbit Transit, Community Action Agency, Agency on Aging, The Greater Susquehanna Valley United Way, Red Cross, Susquehanna Valley Visitors Bureau, and media providers such as *The Daily Item* and *WKOK 1070AM* – all of whom take a regional approach involving Snyder, Union, Northumberland, and/or Montour counties. *Id.* at 24-26. In conclusion, Mr. Derk stressed the importance of keeping counties whole whenever possible: “As our members or neighbors ask about how to contact their member of Congress, it is helpful if entire communities are kept together to avoid confusion at the ballot box or as citizens seek constitute services from their legislator.” *Id.* at 26-27.

During his testimony on behalf of the WLCC, Mr. Fink outlined the industrial, educational, and highway systems of Lycoming County,

emphasizing the importance of keeping the county together. *Id.* at 31. He pointed to the period 2000-2010, during which Lycoming County was split into two congressional districts, making it difficult to work on county-wide issues. *Id.* at 31-32. Mr. Fink also urged the committee to include Lycoming County in the same district with its neighboring counties of Clinton, Tioga, Union, Northumberland, Snyder, and Sullivan counties. *Id.* at 32-33. In support thereof, Mr. Fink described the workforce development projects involving some or all of those counties, such as the SEDA-COG. *Id.* at 32.

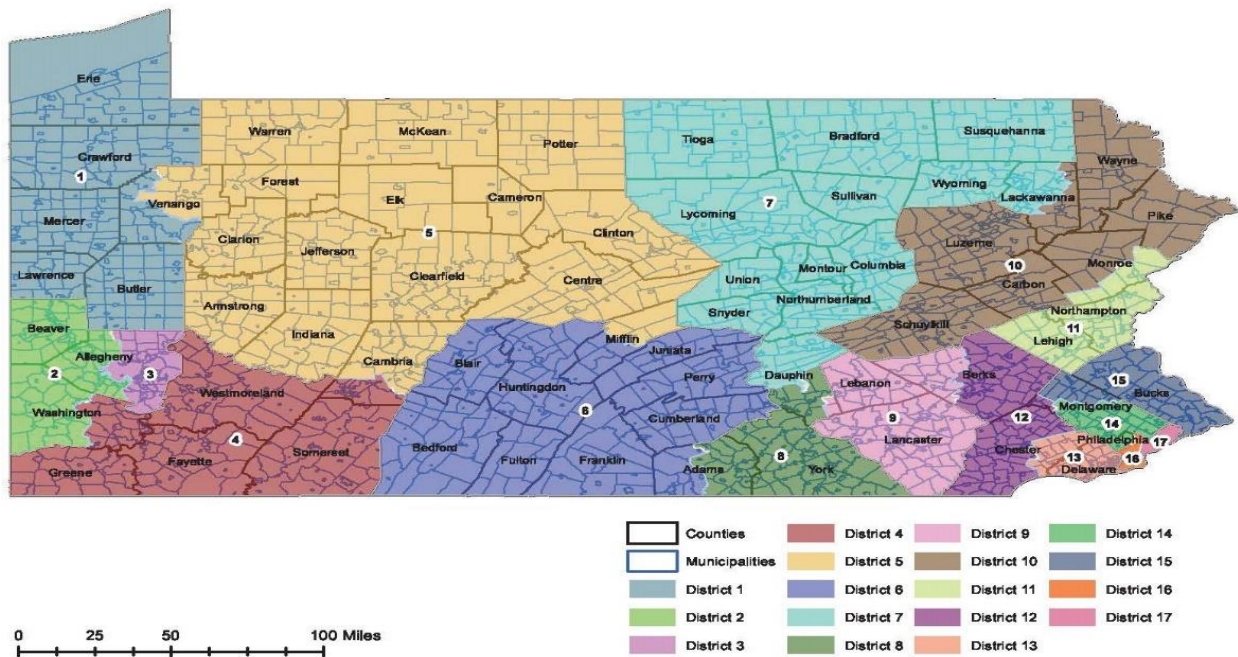


Borrowing a term used by Mr. Derk, Mr. Fink referenced the “commute shed” travel patterns of residents between Lycoming, Clinton, Tioga, Union, Northumberland, Snyder, and Sullivan counties. *Id.* at 32. Mr.

Fink also noted that employers in Lycoming County – such as West Pharmaceuticals, Shop-Vac Corporation, L3 Harris,² Lycoming Engines, Spartonics, PMF Industries, and QorTek – draw from schools in Union (Bucknell University, SUN Area Technical Institute), Snyder (Susquehanna University), Clinton (Lock Haven University), and Tioga (Mansfield University) counties. *Id.* at 30-31, 32-33.

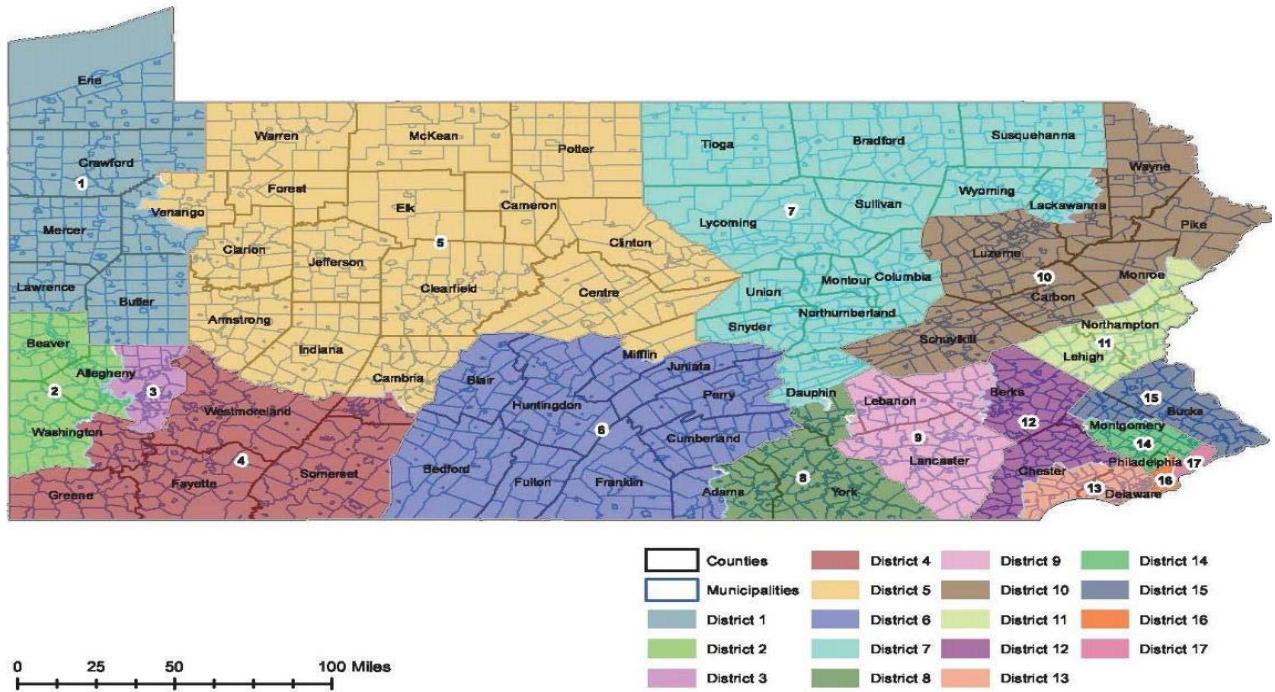
C. The Maps That Best Capture The Communities Of Interest Principle For Amici’s Region Are the Resenthaler Maps For The New 7th District.

Resenthaler 1 Congressional Map



² L3 Harris is now known as Stellant Technologies.

Reschenthaler 2 Congressional Map

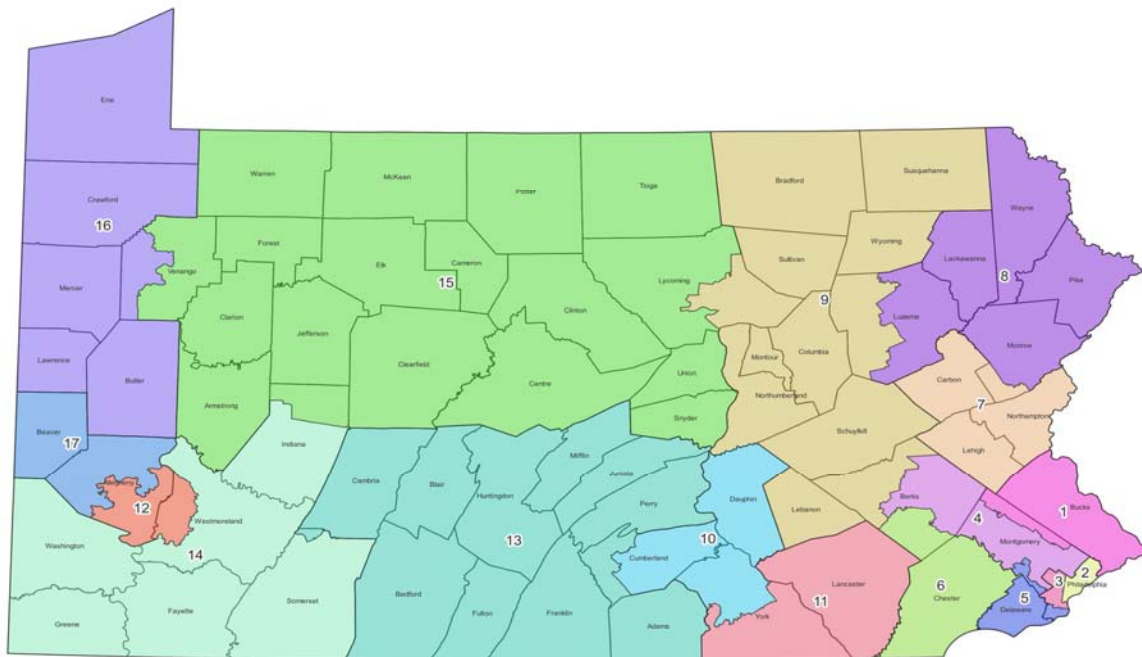


As is evident above, the Reschenthaler maps, while not perfect, best depict the communities of interest described by Mr. Derk of the GSVCC and Mr. Fink of the WLCC. Their testimony before the Pennsylvania House State Government Committee stressed the need, from a communities of interest perspective, to avoid splits in Lycoming, Union, Snyder, Northumberland, and Montour counties. The Reschenthaler maps accomplish this. They also group these counties together in a single district, and pair them with other counties like Sullivan, Columbia, and Tioga counties that complete the region.

D. The Maps Submitted By The Carter Petitioners, Governor Wolf, And The Senate Democratic Caucus Greatly Separate Amici’s Communities Of Interest.

While amici respectfully submit that the Reschenthaler maps best depict their communities of interest over the map proposed by Judge McCollough, more important to amici is the rejection of those maps that do the greatest violence to the region’s communities of interest.

Proposed PA Congressional Map: Carter et al. plaintiffs

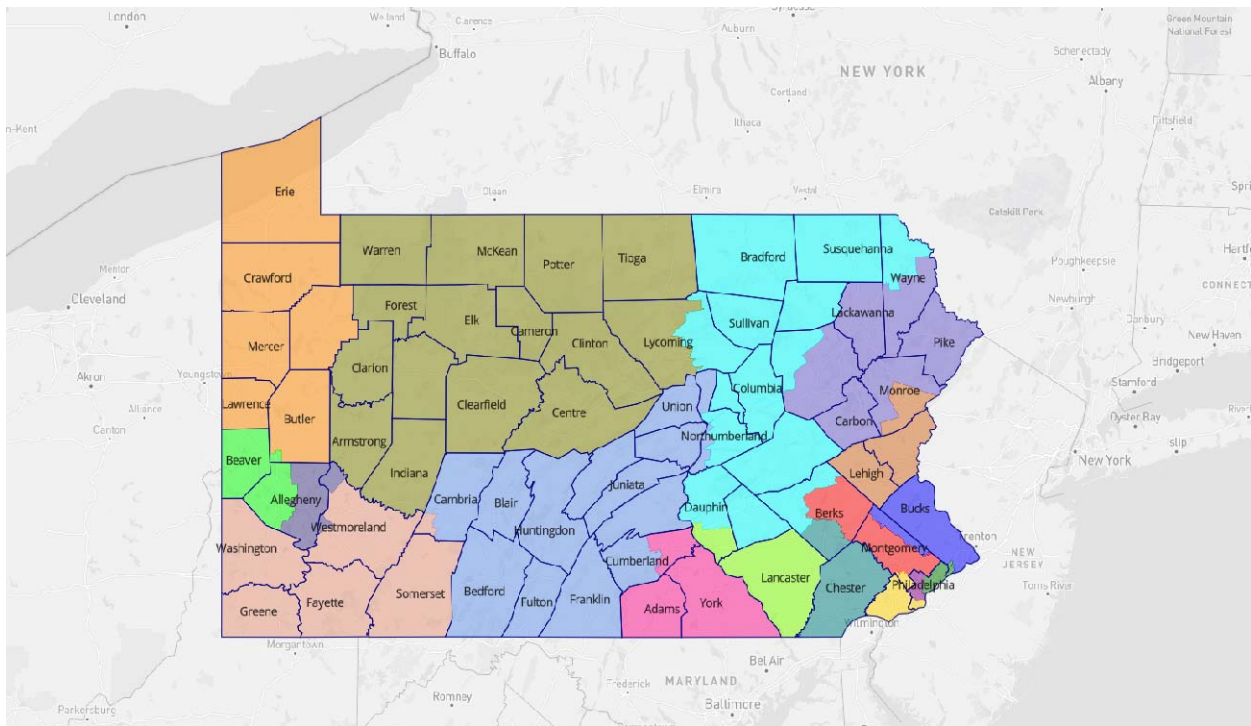


Map: Jonathan Lai (@Elaijuh)

The map above submitted by the Carter Petitioners splits Lycoming County into two congressional districts – the newly-created

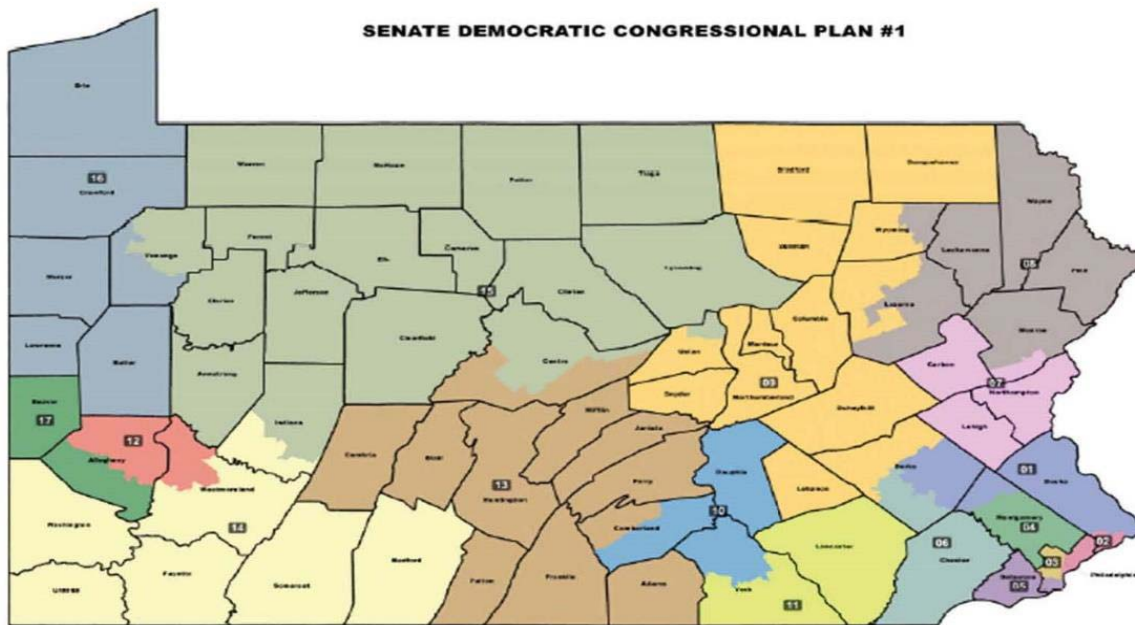
15th District (apportioning most of the county with its neighbors to the west), and the newly-created 9th District to the east. This map also groups Union and Snyder counties into the 15th District, separating them from eastern Lycoming County and their other regional partners to the east (particularly Northumberland and Montour counties).

The Governor's Map

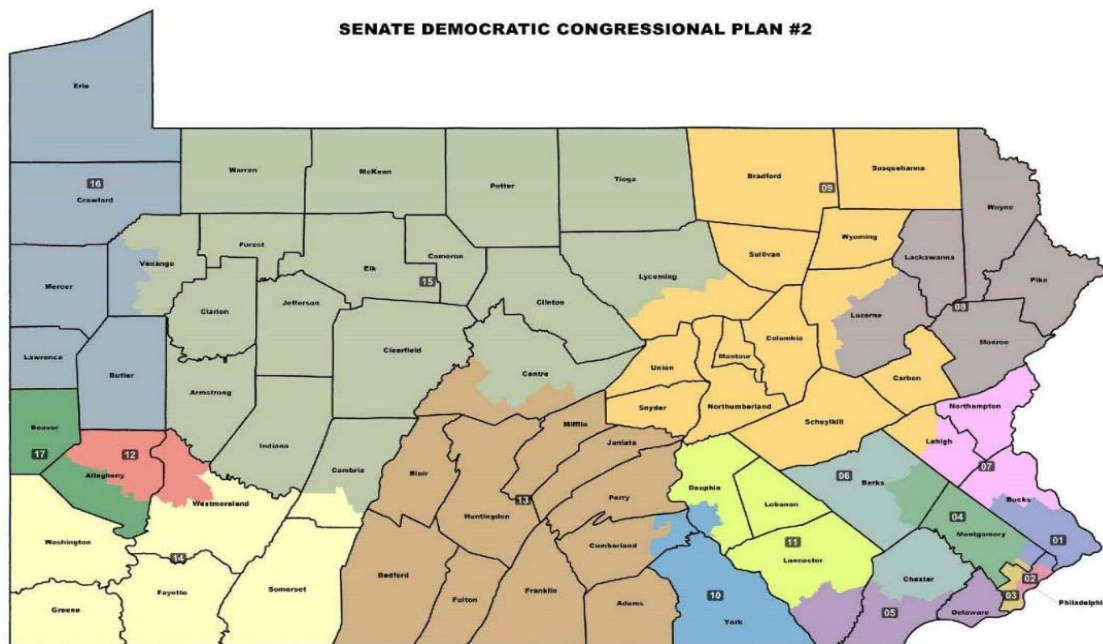


The Governor's Map splits the regions represented by the WLCC and GSVCC into three congressional districts. The western half of Lycoming County, along with all of Tioga County, are grouped with counties to their west extending all the way to Clarion and Armstrong counties into the newly-created 14th District. The northern and eastern

parts of Northumberland County, along with Union and Snyder counties, are grouped with counties to their southwest extending as far as the Maryland border into the newly-created 12th District. All that remains of the communities of interest articulated above is the newly-created 9th District, which includes the eastern half of Lycoming County (to include Williamsport), along with Bradford, Sullivan, Columbia, Montour, and most of Northumberland County.



Map #1 submitted by the Senate Democratic Caucus Intervenors severs Lycoming County, Tioga County, and the tip of Union County from its regional partners in Snyder, Northumberland, Northampton, Montour, and Sullivan counties.



Map #2 submitted by the Senate Democratic Caucus Intervenor is very similar to Map #1, except that it groups part of Lycoming County and all of Union County with its regional partners in Snyder, Northumberland, Northampton, Montour, and Sullivan counties.

The WLCC and GSVCC recognize that the drawing of a new congressional map following the 2020 census is a complicated endeavor, involving numerous factors and all counties across Pennsylvania. The purpose of this brief is not to upset the delicate balance struck by Judge McCullough. Rather, the WLCC and GSVCC seek only to modify her findings to keep communities of interest in their region together.

VI. CONCLUSION

Wherefore, for the reasons set forth herein, the Williamsport/Lycoming Chamber of Commerce and Greater Susquehanna Valley Chamber of Commerce respectfully request that this Court adopt the Special Master's Report, but adopt the formulation of the 7th Congressional District depicted in the Reschenthaler maps.

Respectfully Submitted,

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Date: February 14, 2022

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WORD COUNT CERTIFICATION

I hereby certify that the above principal brief complies with the word count limits of Pa.R.A.P. 531(b)(3). Based on the word count feature of the word processing system used to prepare this brief, this document contains 3,043 words.

Respectfully Submitted,

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CERTIFICATE OF COMPLIANCE

I certify that this filing complies with the provisions of the *Public Access Policy of the United Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts* that require filing confidential information and documents differently from non-confidential information and documents.

Respectfully Submitted,

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COMMONWEALTH OF PENNSYLVANIA
HOUSE OF REPRESENTATIVES
STATE GOVERNMENT COMMITTEE

NORTH CENTRAL REGIONAL PUBLIC HEARING
ON CONGRESSIONAL REDISTRICTING

WELLSBORO FIRE ANNEX
EAST AVENUE
WELLSBORO, PENNSYLVANIA

TUESDAY, OCTOBER 12, 2021
4:02 P.M.

BEFORE:

- HONORABLE SETH GROVE, MAJORITY CHAIRMAN
- HONORABLE SCOTT CONKLIN, MINORITY CHAIRMAN
- HONORABLE RUSS DIAMOND (VIRTUAL)
- HONORABLE DAWN KEEFER
- HONORABLE ANDREW LEWIS (VIRTUAL)
- HONORABLE BRETT MILLER (VIRTUAL)
- HONORABLE ERIC NELSON (VIRTUAL)
- HONORABLE CLINT OWLETT
- HONORABLE FRANK RYAN (VIRTUAL)
- HONORABLE PAUL SCHEMEL (VIRTUAL)
- HONORABLE LOUIS SCHMITT (VIRTUAL)
- HONORABLE ISABELLA FITZGERALD (VIRTUAL)
- HONORABLE BENJAMIN SANCHEZ (VIRTUAL)
- HONORABLE JARED SOLOMON (VIRTUAL)

BRENDA J. PARDUN, RPR
REPORTER - NOTARY PUBLIC

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	ROGER BUNN	
8	VICE-CHAIR	
	TIOGA COUNTY BOARD OF COMMISSIONERS	
9	WELLSBORO, PENNSYLVANIA	
10		
	MALCOLM DERK	
	GREATER SUSQUEHANNA VALLEY CHAMBER	
11	OF COMMERCE	
	FREEBURG, PENNSYLVANIA	
12		
	JASON FINK	
13	WILLIAMSPORT/LYCOMING CHAMBER OF COMMERCE	
	WILLIAMSPORT, PENNSYLVANIA	
14		
	MARY ANN HESTON	
15	HECTOR TOWNSHIP, PENNSYLVANIA	
16		
	JANET GYEKIS	
	WELLSBORO, PENNSYLVANIA	
17		
	BRYN HAMMARSTROM, RN	
18	MIDDLEBURY CENTER, PENNSYLVANIA	
19		
	AMY SHIELDS	
	EXECUTIVE DIRECTOR	
20	ALLEGHENY HARDWOOD UTILIZATION GROUP	
	KANE, PENNSYLVANIA	
21		
	JAMES VAN BLARCOM	
22	SUGAR BRANCH FARMS	
	COLUMBIA CROSS ROADS, PENNSYLVANIA	
23		
	ADJOURNMENT	
24		
25		

1 divided amongst multiple districts would
2 create undue burden on our elected officials,
3 create confusion with our electorate, and make
4 clear communication with our state elected
5 officials more difficult. We respectfully
6 request that our congressional boundaries, as
7 currently defined, remain unchanged.

8 Thank you for your time and efforts
9 in this most important issue. Signed by the
10 Tioga County Commissioners.

11 Thank you.

12 MAJORITY CHAIRMAN GROVE: Thank you
13 so much, Commissioner Bunn. Appreciate your
14 willingness to come testify and participate
15 this evening.

16 Before we head to our next testifier,
17 if Representative Eric Nelson wants to chime
18 in and say hi, he's participating virtually.

19 REPRESENTATIVE NELSON: Hello. Thank
20 you, Mr. Chair. Appreciate being a part of
21 the hearing. Hello from Westmoreland County.

22 MAJORITY CHAIRMAN GROVE: Thank you.

23 Next testifier, Malcolm Derk, Greater
24 Susquehanna Valley Chamber of Commerce, from
25 Freeburg, Pennsylvania.

1 Mr. Derk, thank you so much for
2 coming and testifying this evening. And when
3 you're comfortable and ready, and as long as
4 that green light is on, the floor is yours.

5 MR. DERK: Thank you very much.

6 On behalf of the Greater Susquehanna
7 Valley Chamber of Commerce, the greater
8 Susquehanna Valley, please accept our
9 gratitude for the opportunity to share remarks
10 with you today to the State Government
11 Committee.

12 Representative Seth Grove and
13 Representative Scott Conklin, I thank you, as
14 chairs of this committee, for allowing us this
15 opportunity.

16 And Representative Owlett, I
17 appreciate being in Wellsboro, your home
18 district.

19 So, thank you for this opportunity.

20 I hope to share some information that
21 would be helpful to you, as you go about this
22 very important work of congressional
23 redistricting. My name is Malcolm Derk, and I
24 am the chair of the Government Affairs
25 Committee of the Greater Susquehanna Valley

1 Chamber.

2 The testimony I share today is the
3 result of several listening sessions that
4 we've held with our members, and we're a very
5 diverse chamber that has health care,
6 educational members, as well as a variety of
7 wood products industries represented. The
8 views do not necessarily reflect the views of
9 my employer or the leadership of the chamber,
10 but are the general consensus of those
11 listening sessions that we held at the Greater
12 Susquehanna Valley Chamber. We hope that you
13 find these comments to be useful as you move
14 ahead with your important work.

15 I appreciate the momentous task that
16 you now have, as we know that the census has
17 required that Pennsylvania will lose one
18 congressional representative, one seat, and it
19 requires you to look at all of the lines once
20 again, something that I don't envy.

21 As you move forward with this
22 important work, our chamber members really
23 would like you to look at three overarching
24 points: the natural travel patterns of
25 constituents; communities of interest; and

1 recognizable boundaries, specifically
2 boundaries that are familiar to residents and
3 distinguishable by voters.

4 Travel patterns in the region take
5 advantage of highways and road systems that
6 tie our region together, and in our home
7 communities -- Snyder, Union, Northumberland,
8 and Montour counties -- we're blessed with
9 having a robust system of highways and bridges
10 that tie those communities together and create
11 a network that feels very much like a unified
12 community. We live, work, recreate, and
13 engage in commerce based on the ease by which
14 we're able to travel. And along the 11 and 15
15 corridor in Snyder County, a large number of
16 retail establishments, restaurants, lodging
17 options, and grocery stores are located in
18 Shamokin Dam, Selinsgrove, and in Monroe
19 Township, and these amenities draw neighbors
20 from their surrounding counties, and it really
21 covers a large radius of the population.

22 In areas where natural travel
23 patterns are considered by a lack of connected
24 infrastructure, it really makes it difficult
25 for those communities to share common

1 interests. But we are thankful that our
2 chamber region really does have that unified
3 feel because of the reliable transportation
4 infrastructure that has been supported by
5 federal and state governments.

6 More and more, the travel patterns in
7 our region also encompass Lycoming and
8 Columbia County, as the central Susquehanna
9 Valley throughway is under construction and
10 continues to tie us closer to Interstate 80
11 and that important corridor.

12 Our large employers, such as major
13 health systems of Geisinger and UPMC, they
14 provide jobs that pull employees from a
15 multi-county region that includes Lycoming,
16 Columbia, Montour, Union, Snyder, and
17 Northumberland counties. Educational
18 institutions like Bucknell and Susquehanna
19 also require a larger area to recruit capable
20 employees that are educated and skilled
21 workers.

22 The wood products industry also is
23 not alone, and that's in Snyder and Union
24 County. We have a variety of wood products
25 industries, cabinetry makers and others that

1 require a large amount of skilled workforce
2 that pull from a multi-county area.

3 These employees are required to
4 continue to look beyond just one county
5 boundary. So, again, this creates a sense of
6 a unified feel and a community of interest in
7 the broader surrounding area.

8 While not a watershed in the
9 traditional sense, we think of the
10 transportation corridor as creating
11 communities of interest in a similar way that
12 streams, creeks, and rivers create a
13 watershed. So, we call it -- rather than a
14 watershed, we call it a job shed or an
15 employment shed, and it's the catchment basin
16 that our various large employers use to find
17 skilled workers.

18 We ask that the committee consider
19 these flows of people for work and for
20 commerce as you engage and establish new
21 congressional boundaries. I am certain that
22 each of you see similar movements within your
23 community and in the cohesion created by work
24 forces and travel patterns.

25 In our rural region, it's not

1 uncommon for many of our neighbors to commute
2 to other counties, thirty to forty minutes to
3 an hour away, to find meaningful employment
4 that's family-sustaining. Such a commute in
5 an urban area may be traveling just a few
6 miles, but in our rural community, such travel
7 times can get us thirty to fifty miles away
8 from home. And that's another area that I'd
9 like you to consider as you look at this
10 important work.

11 Communities of interest are also
12 created by the ways we collaborate with
13 neighbors, and Jeff Reber, from Union County,
14 mentioned that there are various ways that
15 counties collaborate for services. In Snyder,
16 Union, and Northumberland County, the region
17 established the central Susquehanna 911
18 system. The three-county collaboration shows
19 how small rural counties can work together to
20 improve efficiency, cost, reliability, and
21 improve scale. The 911 system also partners
22 with several other counties in using a shared
23 phone system that includes Lycoming County as
24 well.

25 Union and Snyder County and other --

1 other agencies also collaborate for
2 transportation with Rabbit Transit and
3 community action agencies that are shared
4 across county boundaries. And in our area --
5 the Snyder, Union, Northumberland County
6 region, we often refer to all three counties
7 as the SUN counties because they partner on so
8 many different varieties of social service and
9 government-administered funds.

10 Other social and nonprofit
11 organizations also function in this
12 multi-county way. The Greater Susquehanna
13 Valley United Way, the Red Cross, and the
14 Susquehanna Valley Visitors Bureau also all
15 share this regional approach. Grouping these
16 collaborative communities together in one
17 congressional district makes a lot of sense
18 because they do share this common interest.

19 Communities of interest are also
20 created by media coverage, and I think that's
21 one thing that you can appreciate in your
22 roles. The chamber has several newspapers and
23 other media providers that offer quality
24 coverage and reporting to help inform the
25 citizenry. The Daily Item, for example,

1 covers the counties of Snyder, Union, and
2 Northumberland, and Montour, and 1070 WKOK AM
3 provides coverage of local events and also a
4 talk radio program to help inform people
5 Monday through Friday of local news coverages.

6 The media assets help to inform the
7 public regarding their government decision
8 making. We are also fortunate that these
9 media markets align with the current
10 congressional districts and our chamber
11 region. Helping our members and fellow
12 citizens receive current and transparent
13 information is important to consider in
14 district lines. These media groups create
15 affinity in the region, as we seek to have an
16 informed populace. We should not
17 underestimate the importance of regional media
18 in creating communities of interest. It is
19 important for the public to know what their
20 elected officials are doing and to know how to
21 access government.

22 I would like to dedicate the final
23 portion of my testimony to the importance of
24 maintaining, wherever possible, recognizable
25 municipal boundaries. Keeping an entire

1 county within the same congressional district
2 helps to avoid confusion among voters and
3 provides an ease in recognizing districts.
4 Keeping counties whole should be a goal,
5 wherever possible. But we also realize that
6 there are population shifts that make this
7 difficult in some instances.

8 We humbly request that when that does
9 happen that you do your best to find other
10 recognizable political subdivisions that help
11 to make sure we maintain communities of
12 interest and, for example, if there has to be
13 a split of a county, perhaps there's two
14 school districts in that county, that a whole
15 school district would remain intact.

16 Likewise, if you look at smaller
17 subdivisions such as a borough or a township,
18 we ask that those be kept whole as much as
19 possible.

20 As our members or neighbors ask for
21 how to contact their congressional
22 representatives, it's helpful for entire
23 communities to be kept together to avoid
24 confusion at the ballot box or as people seek
25 constituent services.

1 Please keep municipalities and
2 communities of interest whole as much as
3 possible.

4 Thank you, again, for your time today
5 and for your interest in creating fair
6 districts and for creating this transparent
7 process where the public can engage with you
8 and your colleagues across the state.

9 Thank you again for your time.

10 MAJORITY CHAIRMAN GROVE: Thank you
11 so much.

12 Just to let you know, Rabbit
13 Transit's executive director is my HOA
14 president.

15 MR. DERK: Wonderful. Then you
16 certainly know the work.

17 MAJORITY CHAIRMAN GROVE: Right.
18 Right. That's good stuff. So, thank you so
19 much.

20 MR. DERK: Thank you.

21 MAJORITY CHAIRMAN GROVE: Appreciate
22 your time and your testimony.

23 We do have another member joining us
24 online, Representative Paul Schemel.

25 If you want to hop on, Paul, and say

1 hi, introduce yourself.

2 REPRESENTATIVE SCHEMEL: Hi. Thanks
3 so much. Look forward to the testimony.

4 MAJORITY CHAIRMAN GROVE: Thank you.

5 Next we have Jason Fink,
6 Williamsport/Lycoming Chamber of Commerce,
7 Williamsport, Pennsylvania.

8 Mr. Fink, thank you so much for
9 joining us and taking time out of your
10 schedule to do that. We look forward to your
11 testimony. And when you're comfortable and
12 ready, go ahead and begin.

13 MR. FINK: Sounds good. Thank you.

14 Good afternoon. My name is Jason
15 Fink, and I'm the president and CEO of the
16 Williamsport/Lycoming Chamber of Commerce.

17 Thank you to the House State
18 Government Committee for this opportunity to
19 address the upcoming congressional
20 redistricting here in Pennsylvania. I
21 appreciate the fact that you are doing these
22 across Pennsylvania and giving areas such as
23 ours the opportunity to voice their thoughts
24 on what should be considered for how the new
25 districts will be drawn and accommodating the

1 loss of one of our congressional seats.

2 To begin with my comments, I'd like
3 to give you a baseline of Lycoming County. We
4 have a population of roughly 114,000 people
5 and are one of fourteen MSAs here in the
6 Commonwealth. Most of our population can be
7 found in the greater Williamsport area. The
8 city itself is a population of approximately
9 28,000 people, and the greater Williamsport
10 area is just under 90,000.

11 There are eight public school
12 districts in the county. We have two
13 colleges: Pennsylvania College of Technology,
14 with a student population of 4500, and
15 Lycoming College, with a student population of
16 1500.

17 We have a strong industrial base here
18 in the county. Manufacturing is vibrant and
19 growing, as we see new industries such as
20 Digger Specialities and Chance Aluminum
21 establishing new operations here. We're also
22 seeing growth with existing manufactures, such
23 as West Pharmaceuticals and Shop-Vac
24 Corporation.

25 Additionally, we have a strong

1 presence of industry that conduct federal work
2 with the Department of Defense, including L3
3 Harris, Lycoming Engineers, Spartronics, PMF
4 Industries, and QorTek.

5 The county has major highways running
6 through it, with I-180, US 15, and US 220. It
7 has rail service with mainline service by NS
8 and short-line service with North Shore
9 Railroad. We also have the Williamsport
10 Regional Airport.

11 It should also be noted that we are
12 also home to the US Middle District Courthouse
13 in Williamsport.

14 Given the size of our county, we are
15 first and foremost concerned about ensuring
16 that any redistricting be done which keeps
17 Lycoming County whole. This has been mostly
18 the case when maps have been drawn, however it
19 hasn't always been that way. From 2000 to
20 2010, Lycoming County was split with roughly
21 two-thirds of the county being in the 5th
22 Congressional District and the remaining
23 portion in the 15th Congressional District.

24 Our congressmen during that time were
25 John Peterson and Glenn Thompson. Both were

1 great to work with, however it was difficult
2 at times for us, in trying to work with them
3 on a county-wide -- on county-wide issues
4 given the nature in which we were divided.

5 Having been through something like
6 this in our not-to-distant past, we would
7 strongly encourage those in finalizing the new
8 congressional districts to keep Lycoming
9 County whole.

10 We would next request that, as the
11 maps are drawn, that consideration been given
12 to provide us to be included with neighboring
13 counties, as is currently done. Those
14 counties that I speak of include Clinton,
15 Tioga, Union, Northumberland, Snyder, and
16 Sullivan. There are many items that we work
17 with these counties on, as all but two of
18 these are in the same local development
19 district, SEDA-COG.

20 Specifically to the chamber, we have
21 a number of workforce development
22 opportunities that we work with neighboring
23 counties here in the region. Our commute shed
24 for industries in our counties include all
25 that were mentioned. Area industries also

1 rely upon colleges in the region, including
2 Bucknell, Susquehanna, Lock Haven, and
3 Mansfield. There also is greater involvement
4 with current technical schools, such as SUN
5 vo-tech and Central Mountain.

6 It is understood that there will be
7 changes that need to be made based upon the
8 loss of our congressional seat. This is part
9 of a larger problem that we, as
10 Pennsylvanians, need to look at addressing now
11 so that we don't see this occurrence in 2030,
12 when the next census is complete.

13 For now, though, we ask that Lycoming
14 County be kept whole and that our existing
15 relationships with neighboring counties be
16 maintained as they currently are in developing
17 this new congressional map.

18 Thank you for taking this request in
19 consideration.

20 MAJORITY CHAIRMAN GROVE: Thank you
21 very much for your testimony and your time
22 this evening. Really appreciate it.

23 Next testifier is Mary Anne Heston,
24 Hector Township, Pennsylvania.

25 Mary Anne, come on up. And when you