

# Consulting Party Meeting # 2

## Comments and Responses

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Pittsburgh Vertical Clearance Projects

Prepared for:

Norfolk Southern Railway Company



Date: March 2023

**Norfolk Southern Railway Company  
Pittsburgh Vertical Clearance Projects  
Effects Report and CP Meeting 2, December 14, 2022  
Responses to Comments**

Comment #	Document/Page #/ Section/Paragraph	Commenter	Comments	Responses
1	<b>12/13/2022 PA SHPO Response Letter/ Page 1/Overall Project Comments/Paragraph 1</b>	<b>Emma Diehl/ Barbara Frederick</b>	We require more information to complete our review of the Determination of Effects Report. We may have additional questions following the December 14, 2022, consulting party meeting. The comments of PA SHPO should be considered alongside those raised by other consulting parties for the project. Please forward other consulting party comments on the report as they are received for our consideration. Please submit the comments and revised report in response to the More Information Request via PA-SHARE.	All consulting party correspondence will be forwarded to the PA SHPO via PA-SHARE and responses to comments received from the PA SHPO and other consulting parties will be submitted via PA-SHARE.
2	<b>12/13/2022 PA SHPO Response Letter/ Page 1/Review Period/ Paragraph 1</b>	<b>Emma Diehl/ Barbara Frederick</b>	According to the PennDOT Cultural Resources Handbook (Publication No. 689), the consulting parties have 30 days to comment on a PennDOT/FHWA finding that a project has an effect on historic properties. The over 400-page report with appendices was provided to the consulting parties via email on December 1, 2022, two weeks before the consulting party meeting, scheduled for December 14th. The consulting parties should be given until December 30, 2022, to provide comments on the Determination of Effect Report. An additional 30-day review period should be allowed for any new information provided at the December 14th consulting party meeting or in response to comments made on the Determination of Effect Report.	The Determination of Effect Report was provided to consulting parties on December 1, 2022, with a standard 30-day review period. Comments were requested by January 6, 2023, to consider the upcoming holidays. The consulting party meeting was scheduled approximately two weeks or half-way through the review period to ensure that any questions on the report could be discussed prior to consulting parties finalizing their comments. The Alternatives Analysis requested by the PA SHPO later in its letter was uploaded to the Norfolk Southern project website on December 15, 2022, and the comment period was thereby extended to January 14, 2023. The PA SHPO requested that the Alternatives Analysis be uploaded to PA SHARE on December 21, 2022; the report had been uploaded to PA-SHARE on December 15, 2022, but was apparently rejected. The Alternatives Analysis was reloaded to PA-SHARE on December 21, 2022.
3	<b>12/13/2022 PA SHPO Response Letter/ Page 1/Public Involvement and Consulting Party Coordination/ Paragraph 1</b>	<b>Emma Diehl/ Barbara Frederick</b>	As part of this additional information request, please provide an explanation as to why there has been no consultation on this vertical clearance project since 2020.	The W. North Avenue Bridge project was ordered by the Pennsylvania Public Utility Commission (PUC) to enter into a mediation session with interested parties to resolve concerns with the City of Pittsburgh and neighborhood organizations. This process took over two years due to COVID restrictions and other factors before an agreement among the parties was reached and the compliance processes could resume.
4	<b>12/13/2022 PA SHPO Response Letter/ Page 2/Purpose and Need/ Paragraph 1</b>	<b>Emma Diehl/ Barbara Frederick</b>	The purpose of the review process is to ensure consideration of historic properties alongside the purpose and need of the project. The Purpose and Need statement on pages 5-9 address the needs of the overall project but does not address the specific needs at the five obstruction locations beyond noting height restrictions or condition of existing overhead bridges. For several of the project locations, more information is needed on site specific requirements. For example, for the West North Avenue Bridge, the pedestrian use requirements for sidewalk height, grades, and ADA accessibility are not stated. Please include more detailed information on the specific requirements of each location either here or in the relevant sections of the report.	The purpose and need statement was developed for a rail transportation project to achieve the PUC required minimum vertical clearance to accommodate double stack trains and thus addresses the five obstructions located on the Pittsburgh and Ft. Wayne lines. Secondary, site-specific requirements related to roadway or sidewalk designs are required to comply with Norfolk Southern, City of Pittsburgh, PennDOT and ADA guidelines. These standards include NSR Infrastructure Standard Plans, AASHTO Green Book, PennDOT Design Manual 2, and City of Pittsburgh Standards of Construction, Right of Way Procedures, and the ADA Standards for Accessible Design, each of which has been complied with during the design process and will be utilized as design guidance and standards as final design is completed on all projects.
5	<b>12/13/2022 PA SHPO Response Letter/ Page 2/Consideration of Alternatives/Paragraph 1</b>	<b>Emma Diehl/ Barbara Frederick</b>	36 CFR 800.6 requires the development and evaluation of alternatives or modifications to the undertaking that could avoid, minimize, or mitigate adverse effects. For each location, the report lists the names of the alternatives and describes and assesses the effects of the preferred alternative. There are references	The Alternatives Analysis was uploaded to the Norfolk Southern project website on December 15, 2022, and the comment period was thereby extended to January 14, 2023. The PA SHPO requested that the Alternatives Analysis be uploaded to PA SHARE on December 21, 2022; the report had been uploaded to

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			to Alternatives Analysis Reports for each of the five obstruction locations in the report: Washington Avenue Bridge (page 19), the Amtrak Station Project (page 43), West North Avenue (page 84), Pennsylvania Avenue (page 133), and Columbus Avenue (page 154). We request a copy of the alternatives analysis reports for each of the five locations in order to document alternatives that were considered to avoid or minimize adverse effects to historic properties.	PA-SHARE on December 15, 2022, but was apparently rejected. The Alternatives Analysis was reloaded to PA-SHARE on December 21, 2022.
6	<b>12/13/2022 PA SHPO Response Letter/ Page 2/ Project Specific Comments: Washington Avenue Bridge Project/ Paragraph 1</b>	<b>Emma Diehl/ Barbara Frederick</b>	This project involves lowering track beneath the bridge that carries Washington Avenue over the Pennsylvania Railroad: Main Line (Harrisburg and Pittsburgh) Railroad Corridor Historic District (Pennsylvania Railroad: Main Line) and repairing spalls and repointing the substructure of the contributing bridge. Will there be protection for the adjacent stone retaining wall and decorative wrought iron fencing, also contributing resources to the Pennsylvania Railroad: Main Line during construction? Will there be a commitment to restore portions of the wall or fencing in accordance with the Secretary of the Interior's Standards that might be affected during exposure or construction?	Any repairs to the bridge's masonry substructure units will be carried out in accordance with the Secretary of the Interior's Standards (SOI Standards). These commitments will be included in the stipulations of the projects' memorandum of understanding (MOU); details of how these measures will be carried out by the project's contractors will be detailed in the project plan sheets and specifications as part of the final design process. Currently, the project does not anticipate any repairs to the adjacent stone retaining wall or decorative wrought iron fencing.
7	<b>12/13/2022 PA SHPO Response Letter/ Page 2/Project Specific Comments: Amtrak Station Project/Paragraph 1</b>	<b>Emma Diehl/ Barbara Frederick</b>	The project involves alterations to the roof girders and exhaust chutes over track 1 and 2 of the 1958 train shed. The train shed is a contributing resource to both the Pennsylvania Railroad Station and the Pennsylvania Railroad: Main Line. Please provide photographs and more detailed plans of the two locations on both tracks where foundations and new columns will be installed.	A few damaged (bent) columns will be cut and replaced, and one missing column will be replaced. Please see the Alternatives Analysis Report, Appendix B: Conceptual Plans and Profiles. The locations of these column repairs are noted on the following drawing numbers: S-201 (pdf page 180); S-203 (pdf page 182); S-210 (pdf page 189). The new footing required to replace the missing column is noted on drawing number S-210 (pdf page 189) in both the cross section and detail views.
8	<b>12/13/2022 PA SHPO Response Letter/ Pages 2-3/Project Specific Comments: W. North Avenue Bridge Project/Paragraph 2</b>	<b>Emma Diehl/ Barbara Frederick</b>	Contributing features to the Pennsylvania Railroad: Main Line adjacent to this location include concrete retaining walls with stone coping, decorative wrought iron fencing, railroad safety fencing and an elevated out-of-service railroad siding that served the former International Harvester Building. Will there be protection for the adjacent concrete retaining wall with stone coping and fencing during construction? Will there be a commitment to reconstruct/restore portions of the wall or fencing in accordance with the Secretary of the Interior's Standards? How will the substructure for the new bridge tie into the historic wall and fencing? Please also provide more information on how the siding of the former International Harvester Building will be affected by the project.	Any repairs to the concrete retaining walls with cut stone coping and decorative iron fencing will be carried out in accordance with SOI Standards. These commitments will be included in the stipulations of the projects' MOU; details of how these measures will be carried out by the project's contractors will be detailed in the project plan sheets and specifications as part of the final design process.  Alternative 2 would require the entire existing superstructure to be removed and the existing abutments to be increased in height and modified to facilitate the new superstructure. In addition, Abutment 2 (northeast) would be lengthened to correspond with the new superstructure configuration. The new superstructure will eliminate the existing through girder system by using full-span concrete box beams. The box beams would be flared to reduce overall bridge width on the northeast end but would still result in triangular areas on the northeast and southeast bridge quadrants. The expanded footprint of the bridge in these areas would alter and obscure a portion of the concrete retaining walls with stone coping in those areas, remove portions of the standard railroad safety railings north of the bridge, and remove portions of the decorative wrought-iron fencing south of the bridge in this grade-depressed section of the corridor. All of these elements, including the existing W. North Avenue Bridge, contribute to the railroad corridor historic district and their alteration or removal would affect the characteristics that contribute to the historic significance of the district, hence the adverse effect finding in the Determination of Effects Report. New railroad safety

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				<p>fencing that meets current design standards will be installed atop the concrete retaining walls north of the bridge.</p> <p>The out-of-service siding for the former International Harvester Building will not be affected unless the City of Pittsburgh approves a sidewalk option that would utilize a small portion of the siding at its southern terminus for the construction of a sidewalk switchback ramp. This option, which also includes stairs in the public right-of-way, was rejected by the City of Pittsburgh’s Department of Mobility and Infrastructure (DOMI) in an email dated February 13, 2023. Additional coordination with DOMI on acceptable sidewalk alternatives is ongoing. Additional coordination with the consulting parties and PA SHPO will continue as options are vetted.</p>
9	<p><b>12/13/2022 PA SHPO Response Letter/ Page 3/Project Specific Comments: W. North Avenue Bridge Project/Paragraph 3</b></p>	<p><b>Emma Diehl/ Barbara Frederick</b></p>	<p>Please discuss pedestrian needs at this location and alternatives considered to avoid alterations to the façade of the International Harvester Building and the introduction of new visual elements along W. North Avenue in the immediate setting of the International Harvester Building and the Allegheny Second Ward Industrial District. Please also note that some previous infill of the windows and changes to the water table of the International Harvester Building were carried out during the period of significance for the resource (1902-1933).</p>	<p>Sidewalk alternatives in front of the International Harvester Building to reduce the effect on the façade were considered. Four alternatives were considered as the most feasible and constructable alternatives. Option 1 was to bifurcate the W. North Avenue sidewalk in front of the building, keeping the portion of the sidewalk along the building’s façade at existing grade and elevation, and separating the sidewalk that follows the grade of the road with a toe wall and handrail. This option would also add steps within the pedestrian thruway on the east side of the building. The City of Pittsburgh’s DOMI dismissed this bifurcated sidewalk option due to the additional maintenance that would be required and the steps that would be placed within the pedestrian thruway. Option 2 separated the roadway and the sidewalk with a barrier wall, keeping the sidewalk along the building’s facade at existing grade and elevation. This option would also add a ramp within the pedestrian thruway on the east side of the building within the abandoned rail siding. DOMI also dismissed this option due to the main pedestrian thruway being outside the City’s right-of-way. Options 3 and 4, the preferred options for the sidewalk, would ramp the sidewalk down at a steeper slope than the roadway and separate the roadway and sidewalk by either a barrier wall or a landscaped area. This slope would not exceed ADA standards and would keep the elevation of the doorway entrance to the International Harvester Building at the existing elevation. The sidewalk would ramp up along the building and windows, though, requiring some of the existing infill of the windows to remain. DOMI accepted these options as the most preferable. Q Development’s design that incorporates a ramp within the pedestrian thruway on the east side of the building and steps within the public right-of-way was rejected by DOMI in an email dated February 13, 2023. However, we remain committed to finding a mutually agreeable solution through ongoing meetings with Norfolk Southern, PennDOT, Michael Baker, the PA SHPO, DOMI, and other consulting parties that would not result in an adverse effect on the property, would meet SOI Standards, and that would be accepted by DOMI.</p>

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10	12/13/2022 PA SHPO Response Letter/ Page 3/Project Specific Comments: W. North Avenue Bridge Project/Paragraph 4	Emma Diehl/ Barbara Frederick	The report notes the decorative wrought iron fencing lining the railroad corridor is a contributing feature to the Allegheny Commons Historic District. However, there is no discussion of other adjacent landscaping in the park, such as the maple trees along Brighton Road and the ginkgo trees flanking the railroad tracks, which are contributing features. In addition, the low brick retaining wall along W. North Avenue dates to the Simonds & Simonds park-wide redesign scheme of the mid 1960s and is a contributing feature. Please provide more detailed plans on potential project effects and proposed treatment of the wrought iron fencing, landscaping, low brick retaining wall and any other contributing landscape features of the historic district. Please provide more information on the permanent (.09 acres) property take and temporary construction easement (.04 acres) in the park. What is the current appearance and use of this land in this area and how will it be affected by the project?	<p>FENCING: A section of non-matching iron fencing along the northeast side of the rail corridor in the park (replaced in 1929 when the new W. North Avenue Bridge was constructed) will be removed for the extension of the northeast abutment. The wingwall of the abutment will be topped with new wrought-iron decorative fencing matching the historic fencing lining the railroad corridor through the park. This same replica fencing will be added to the toe wall being replaced south of the railroad corridor along the edge of the sidewalk paralleling Brighton Road. Preliminary plans also show the replica fencing along the outside edges of the bridge, but a Design Advisory Team (DAT) will review and make recommendations for aesthetic treatments during the final design stages of the project development process.</p> <p>TREES/LANDSCAPING: Only one tree, a recent planting at the corner of Brighton Road and W. North Avenue will need to be removed/relocated; none of the maple trees or ginkgo trees will be affected. The affected areas of the park, shown in Figure 5-33 of the Determination of Effects Report (page 87), would include a small area along Brighton Road south of the rail corridor where an existing concrete retaining wall would be replaced and a small fill slope would be added from the existing park lawn to the raised sidewalk (depicted in Figures 5-47 and 5-48) and a small area along Brighton Road and W. North Avenue where a fill slope may be added along the backside of the extension of the northeast abutment to the existing park lawn and from the park lawn to the existing sidewalks on Brighton Road and W. North Avenue as depicted in Figures 5-39 and 5-40).</p> <p>LOW BRICK RETAINING WALL: There are two sections of low brick retaining wall extending west from the park path opposite from Buena Vista Street. The first segment extends west for approximately 60 ft from the park path to an iron picket fence; the iron fence extends west for approximately 70 feet to the second segment of brick wall. The second section of brick wall originally extended west for approximately 130 feet, wrapping the bus shelter and extending to the corner of W. North Avenue and Brighton Road. Currently, a large section of the iron picket fence is missing and an approximately 50-foot section of the brick wall from the western edge of the bus shelter to the corner was removed some 15 or more years ago. The proposed project would raise the sidewalk elevation along the wall by 2 inches on the west to 0" on the east. Discussions with the City of Pittsburgh's Director of Public Works and the Superintendent of Parks Maintenance, the Allegheny Commons Initiative, the Pittsburgh Parks Conservancy, and other park stakeholders are ongoing regarding the proposed treatments of the affected area of parkland at the corner of Brighton Road and W. North Avenue. The topics of discussion have focused on fill slopes, whether to reconstruct the missing portion of the brick wall or replace it with other styles of fencing that have been approved in the master planning document and by the Historic Review Commission, and improved landscaping to create a visual gateway into Allegheny Commons Park. NS is committed as part of the</p>

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				<p>minimization and mitigation of project effects to construct the preferred brick wall/fence selected by consulting parties.</p> <p>TEMPORARY CONSTRUCTION EASEMENTS AND PERMANENT RIGHT-OF-WAY: As depicted in Figure 5-33, the current appearance and use of the affected park land is lawn with intermittent trees. The 0.04-acre temporary construction easement is necessary to replace the existing concrete retaining wall along Brighton Road and south of the railroad corridor, while areas of permanent right-of-way totaling 0.09 acre would be required for fill slopes along Brighton Road and W. North Avenue where additional fill soil will be added from the new sidewalk height to the existing park lawn.</p>
11	<p>12/13/2022 PA SHPO Response Letter/ Page 3/Project Specific Comments: W. North Avenue Bridge Project/Paragraph 5</p>	<p>Emma Diehl/ Barbara Frederick</p>	<p>It would be helpful to understand why the alternative that involved the replacement of the bridge and lowering of the railroad tracks to achieve 22' vertical clearance alternative was dismissed, as it would appear this alternative would have minimized impacts to adjacent historic properties.</p>	<p>A copy of the Alternatives Analysis Report containing the justification for the selection of the Preferred Alternative was uploaded to the Norfolk Southern project website on December 15, 2022, and to PA-SHARE on December 21, 2022. In summary, four alternatives were considered in the report and summarized in the Determination of Effects Report. The two lowering alternatives (Alternative 3 - Replace bridge and lower railroad tracks to achieve 22' vertical clearance and Alternative 4 - Combination replace and raise bridge and lower railroad tracks to achieve 22' vertical clearance), while meeting the purpose and need, would have the most impacts including major utility transmission lines which would disturb the railroad retaining walls and the ginkgo trees flanking the railroad cut, which as noted above are contributing features and would result in the greatest total construction length and cost. Under Alternative 3, the four railroad tracks currently within the corridor would not be able to be maintained. Please see Chapter 5 and Appendix D of the Alternatives Analysis Report for additional information on each of the alternatives at this location, the associated effects of each (including effects on air quality, noise, vibration, hazardous waste potential, historic properties, and Section 2002 resources), and the selection and justification of the Preferred Alternative.</p>
12	<p>12/13/2022 PA SHPO Response Letter/ Page 3/Project Specific Comments: W. North Avenue Bridge Project/Paragraph 6</p>	<p>Emma Diehl/ Barbara Frederick</p>	<p>The preferred alternative indicates the replacement bridge would be a single-span prestressed concrete spread box beam bridge. Why was this bridge type selected? Will the new bridge be designed to be compatible with other bridges along the railroad corridor?</p>	<p>Prestressed spread concrete beams were determined to be the best options because they could accommodate the utilities, are a familiar construction type to the contractors in the Pittsburgh area, and would work with the structure alignment. It is thought that these factors will ensure that the final product would provide an effective solution for this vehicular crossing, while eliminating the non-redundant thru-girder design and eliminating the need for a more frequent inspection cycle. The concrete bridge design will also eliminate the need for repainting the bridge. Repainting is a maintenance activity that would interfere with rail traffic for the duration of the repainting operation.</p> <p>This crossing historically used both steel and, later, concrete structures at this location. There is not currently, nor was there historically, a unified bridge type employed at the several grade-separated crossings of the rail corridor through the North Side. Bridge types varied between through girder bridges and truss bridges. In keeping with the new W. Ohio Street Bridge, a suggested theme of</p>

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				recessed panel work on the outside edges of the bridge will ensure compatibility with the bridges in and adjacent to the Allegheny Commons Park.
13	12/13/2022 PA SHPO Response Letter/ Page 3/Project Specific Comments: Pennsylvania Avenue Bridge Project/ Paragraph 1	Emma Diehl/ Barbara Frederick	This project involves replacement of the through-girder bridge that carries Pennsylvania Avenue over the Pennsylvania Railroad: Main Line. A steel pony truss similar in scale and configuration to the original ca. 1905 pony truss bridge is proposed at this location. Contributing features to the railroad adjacent to this location include concrete retaining walls with stone coping, decorative wrought iron fencing and railroad safety railing. Will there be protection for the adjacent stone retaining wall and fencing during construction? Will there be a commitment to restore portions of the wall or fencing in accordance with the Secretary of the Interior's Standards that might be affected during construction?	Any repairs to the concrete retaining walls with cut stone coping and decorative iron fencing will be carried out in accordance with the SOI Standards. These commitments will be included in the stipulations of the projects' MOU; details of how these measures will be carried out by the project's contractors will be detailed in the project plan sheets and specifications.
14	12/13/2022 PA SHPO Response Letter/ Page 3/Project Specific Comments: Pennsylvania Avenue Bridge Project/ Paragraph 2	Emma Diehl/ Barbara Frederick	The project will also require approach work along Pennsylvania Avenue to accommodate the increased height of the bridge. This includes raising the height of the sidewalk by 11" and obscuring the façade of 901 Pennsylvania Avenue, a contributing resource to the Allegheny Second Ward Historic District. Please provide more information on the pedestrian access requirements at this location and efforts made to minimize the introduction of new features into the district.	The sidewalk will follow the roadway along Pennsylvania Avenue. The sidewalk adjustment along the façade of 901 Pennsylvania Avenue extends for a length of 75 ft. This adjustment varies from existing grade to approximately 1-ft increase in height against the building. At that point, the sidewalk is bifurcated with a toe wall and handrail separating the sidewalk following the grade of the roadway from the sidewalk extending to the existing entry door. A meeting with the property owner during the summer of 2022 confirmed that these proposed changes were acceptable. The bifurcated sidewalk ensures that the existing entry door does not need to be altered. All of the building's first-floor window units along Pennsylvania Avenue have been infilled with brick; the raising of the sidewalk to a one-foot maximum will not require any alterations to the building's façade.
15	12/13/2022 PA SHPO Response Letter/ Pages 3-4/Project Specific Comments: Columbus Avenue Bridge Project/Paragraph 2	Emma Diehl/ Barbara Frederick	The project involves lowering the track under the non-contributing bridge that carries Columbus Avenue over the Pennsylvania Avenue: Main Line and track reconfiguration. Minor repairs to the bridge substructure are also planned. No work is proposed along Columbus Avenue or California Avenue. The concrete retaining walls with cut stone coping along the corridor and decorative iron fencing along Allegheny Avenue and Columbus Avenue approach ramp are contributing features. Will there be protection for the adjacent concrete retaining wall and fencing during construction? Will there be a commitment to restore portions of the wall or fencing in accordance with the Secretary of the Interior's Standards that might be exposed or affected during construction?	Any repairs to the concrete retaining walls with cut stone coping and decorative iron fencing will be carried out in accordance with the SOI Standards. These commitments will be included in the stipulations of the projects' MOU; details of how these measures will be carried out by the project's contractors will be detailed in the project plan sheets and specifications.
16	12/13/2022 PA SHPO Response Letter/ Page 4/Minimization and Mitigation/Paragraph 1	Emma Diehl/ Barbara Frederick	We have not commented on the potential for effects in our review of the Determination of Effects Report as we require more information to complete our review. However, we would like to provide some guidance on efforts to minimize or mitigate for adverse effects in advance of the upcoming consulting party meeting as a preliminary discussion of mitigation measures is included in the agenda. The purpose of minimization is to lessen the potential effects of a project on historic properties. Minimization measures can include protection of historic features during construction; repair or replacement of affected features in kind; and the development of landscaping and lighting plans, etc. Minimization measures can be	Noted.

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			commemorated in project agreements but should not be misconstrued as mitigation.	
17	12/13/2022 PA SHPO Response Letter/ Page 4/Minimization and Mitigation/Paragraph 2	Emma Diehl/ Barbara Frederick	Mitigation is used to resolve adverse effects and can include any actions that help to offset or compensate for a project’s negative impacts to a historic property. The PA SHPO maintains Criteria for Meaningful Mitigation: <a href="https://www.phmc.pa.gov/Preservation/About/Documents/Criteria%20for%20Determining%20Meaningful%20Mitigation.pdf">https://www.phmc.pa.gov/Preservation/About/Documents/Criteria%20for%20Determining%20Meaningful%20Mitigation.pdf</a> for use in the development of mitigation ideas. These criteria are to serve as a framework for the development of meaningful mitigation and/or as a tool for assessing the effectiveness of mitigation ideas. The mitigation for adverse effects will be identified in consultation with the PA SHPO and the consulting parties.	Noted. This link is also provided in the Consulting Party Meeting #2 minutes and has been distributed to all consulting parties.
18	01/11/2023 Q Development Response Letter/ Page 1/Paragraph 1	Rick Belloli	Q Development has extensive experience in historic tax credit developments, completing more than \$100 million in project activity in the last decade, nearly all of which utilized the federal and Pennsylvania historic tax credit programs and meeting all applicable United States Secretary of the Interior’s (SOI) Standards for the award of historic tax credits. With this experience in mind, Q Development is opposed to the so-called Preferred Alternative contained in the Effects Report and offers alternatives for consideration. If implemented as proposed, the Preferred Alternative will cause a substantial Adverse Effect to the National Register of Historic Places (NRHP) – listed property at 810 W. North Avenue. As proposed, the Preferred Alternative will violate the SOI Standards jeopardizing \$2.5 million in approved Rehabilitation Investment Tax Credits (RITC) (aka Historic Tax Credits or HTC) already allocated to the \$15 million on-going and under construction rehabilitation of the Allegheny Branch House Lofts building.	It is yet to be determined if the preferred alternative will have an adverse effect on the International Harvester Building. The Determination of Effects Report proposed two options that, in our opinion, meet SOI Standards. A modification to the option, proposed by Q Development, incorporates a ramp within the pedestrian thruway on the east side of the building and steps within the public right-of-way and was rejected by DOMI in an email dated February 13, 2023. Additionally, in a good-faith effort to coordinate with affected property owners, Norfolk Southern and Michael Baker initiated individual meetings with all affected property owners, including two thus far with Q Development. It is also undetermined if any of the proposed solutions will “violate the SOI Standards” as consultation on the effects of the undertaking on the International Harvester Building and all other historic properties within the various APEs is ongoing. We remain committed to finding a mutually agreeable solution through ongoing meetings with Norfolk Southern, PennDOT, Michael Baker, the PA SHPO, DOMI, and other consulting parties that would not result in an adverse effect on the property, would meet SOI Standards, and that would be accepted by DOMI.
19	01/11/2023 Q Development Response Letter/ Page 1/810 W. North Avenue/ Paragraphs 1 - 2	Rick Belloli	<p>In 2020, Q Development sought and successfully secured an individual listing in the National Register of the former International Harvester building (now known as Allegheny Branch House Lofts) before beginning the redevelopment work. This effort was undertaken in particular to avail the project of historic tax credits.</p> <p>The building has been listed on the register under Criteria A, B, and C. Of particular note is Criteria C: Properties “that embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction.”</p>	As noted in the effects report (page 81), the building is listed in the NRHP under Criteria A, B, and C. The aspects of the property that qualify it for inclusion in the NRHP under these criteria were considered in the assessment of project effects. It should be noted that the first determination of eligibility for the International Harvester Building resulted from the cultural resources studies conducted as part of the compliance process for the Norfolk Southern project. Much of the research and findings contained in these reports were ultimately integrated into the NRHP nomination for the property. The project historians are intimately familiar with the building, its history, and its historic significance.



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20	01/11/2023 Q Development Response Letter/ Page 1/810 W. North Avenue/ Paragraphs 3 - 4	Rick Belloli	<p>Further, besides the individual listing in the NRHP, the building at 810 W. North Avenue serves as the apex of <i>five</i> separate and distinct historic districts:</p> <ul style="list-style-type: none"> <li>• Pennsylvania Railroad: Main Line (Pittsburgh to Ohio State Line) Railroad Corridor Historic District</li> <li>• Allegheny West Historic District</li> <li>• Mexican War Streets Historic District</li> <li>• Allegheny Commons Historic District</li> <li>• Allegheny Second Ward Industrial Historic District (eligible)</li> </ul> <p>While the location is significant to each district, standards for evaluation and criteria for Adverse Effects are higher (and ought to be) for individually listed properties than multi-asset resources, thus making the proposed modifications that much more impactful to both the building and each district.</p>	<p>To clarify, the subject building is not located within and does not contribute to the significance of the following historic districts:</p> <ul style="list-style-type: none"> <li>• Allegheny West Historic District;</li> <li>• Mexican War Streets Historic District;</li> <li>• Allegheny Commons Historic District; and</li> <li>• The Pennsylvania Railroad: Main Line (Pittsburgh to Ohio State Line) Railroad Corridor Historic District</li> </ul> <p>We understand that the International Harvester building is both individually listed in the NRHP and is a contributing element of the NRHP-eligible Allegheny Second Ward Industrial Historic District. Project historians have applied the criteria of adverse effect accordingly.</p>
21	01/11/2023 Q Development Response Letter/ Pages 1-2/ 810 W. North Avenue/ Paragraph 5	Rick Belloli	<p>As noted in the Effects Report, the proposed Preferred Alternative will affect this historic property by requiring alterations to the building's front façade, including the construction of window wells or the shortening of three first-floor display windows, and the potential raising of the limestone water table (building base) and windowsills. This approach does not satisfy the SOI Standards, as the windows are Character Defining Features of the building. To secure the Part 2 approval, the National Park Service (NPS) staff noted multiple considerations related to the windows and window openings of the building, requiring Q Development to maintain the full-size openings and design thereof.</p>	<p>See response to comment 18. Two options were presented in the effects report that the authors deemed would meet the SOI Standards as the first-floor window openings 1) have been reduced in size in the past and 2) are currently infilled with concrete block. To our knowledge, neither the SHPO nor the NPS have formally determined that the proposed treatments would not meet SOI Standards. If Q Development has correspondence from the NPS that provides input on this matter, please share with the project team and other consulting parties. As mentioned above, the third option proposed by Q Development that incorporates a ramp within the pedestrian thruway on the east side of the building and steps within the public right-of-way allowing the sidewalk to remain at its existing grade was rejected by DOMI in an email dated February 13, 2023. As project historians are not privy to the correspondence between Q Development and the NPS, we cannot comment on NPS's directives regarding the building's fenestration.</p>
22	01/11/2023 Q Development Response Letter/ 810 W. North Avenue/ Page 2/Paragraphs 6-7	Rick Belloli	<p>Historically, the display window openings on the first floor of the building were used to display the entire product line of International Harvester and to encourage foot traffic into the Branch House and were integral in the marketing efforts of IH at the time. The approved rehabilitation plans call for restoring these openings fully with glazing to increase the transparency between the street and the future public building lobby.</p> <p>Based upon the NPS engagement on this project, it is self-evident that any modification of these window openings or reduction in size thereof will not satisfy the SOI Standards. Thus, the Preferred Alternative jeopardizes the viability of an on-going \$15 million project and the approved \$2.5 million in HTC that provides a significant portion of the capital stack for the development.</p>	<p>It should be noted that the display windows can only be restored to the extent of the existing openings; the original openings were shortened in the 1920s and possibly again in the 1940s during prior vertical clearance projects. Additionally, it is common practice in the preparation of NRHP eligibility determinations, NRHP nominations, and Section 106 reports, that only existing conditions are evaluated. Typically planned renovations are not taken into consideration. When the building was evaluated and as it currently exists, the first-floor window openings are infilled with concrete block and contain no window units. However, we understand Q Development's plans for the building, its use of the reinvestment tax credits, and that work on the building has commenced. Therefore, as previously stated above, we remain committed to finding a mutually agreeable solution that does not result in an adverse effect on the building.</p>
23	01/11/2023 Q Development Response Letter/ Page 2/Determination of Effects Report (December 2022) Response/ Paragraph 1	Rick Belloli	<p>The balance of this letter will respond to pages 114 – 116 of the Report, including Tables 5-11 and 5-12 regarding the Criteria of Adverse Effect and the Findings. A copy of those pages and Tables are enclosed with this letter, but a few citations are worth highlighting:</p>	<p>No response required.</p>

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24	01/11/2023 Q Development Response Letter/ Page 2/Determination of Effects Report (December 2022) Response/Paragraphs 2-3	Rick Belloli	<p><u>Application of the Criteria of Adverse Effect for the International Harvester Building (page 114):</u> The Preferred Alternative would require a vertical alignment adjustment in the 800 block of W. North Avenue that would increase the profile grade [of the roadway] to a maximum of 8.0%. Sidewalk grades would follow the roadway profile except for the sidewalk segment fronting the International Harvester Building, which would have a sidewalk length of 90' consisting of 30' ramp runs of 8.3% with two 5' level landings. The ramp runs would be separated from the roadway with a proposed landscape area in order to maintain access to the building's existing main entrance. While the doorway would not require alteration, three partially infilled first-floor display windows east of the doorway would need to be protected by window wells or shortened by raising the limestone water table and sills to accommodate the increased vertical alignment of the sidewalk. The windows were shortened, and the limestone water table was raised when the vertical alignment of W. North Avenue raised ca. 1929 and again in the 1940s, resulting in the stepped water table seen on the building today. Both window treatment alternatives will be explored with the property owner prior to final design. Concrete stairs would be constructed to access the existing walkway along the building's northeast façade, and a 27' retaining wall with a protective fence would be constructed along W. North Avenue between the stairs and the new bridge.</p> <p><u>Table 5-12 Application of the Criteria of Adverse Effect for the International Harvester Building</u></p> <ul style="list-style-type: none"> <li>• Summary Header Box: Criteria of Adverse Effect: An adverse effect is found when an undertaking may alter, directly or indirectly, any characteristics of a historic property that qualify the property for inclusion in the NRHP in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. Consideration shall be given to all qualifying characteristics of a historic property, including those that may have been identified subsequent to the original evaluation of the property's eligibility for the NRHP. Adverse effects may include reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance or be cumulative.</li> </ul>	No response required.
25	01/11/2023 Q Development Response Letter/ Pages 2-3/Determination of Effects Report (December 2022) Response/Paragraph 4	Rick Belloli	<p><u>Response:</u></p> <ul style="list-style-type: none"> <li>• The Preferred Alternative proposes to "alter directly" the Character Defining Features of the display window openings along the primary façade of W. North Avenue.</li> <li>• The work would "diminish the integrity of the property's location, design, setting materials, workmanship, feeling, or association" substantially.</li> <li>• These changes are an Adverse Effect to the NRHP-listed property.</li> </ul>	Not all of the seven aspects of integrity as defined in <i>National Register Bulletin: How to Apply the National Register Criteria for Evaluation</i> will be affected as stated in your comment. Please also refer to the responses to comments 18 and 21 regarding the three proposed options for the new sidewalk fronting the International Harvester Building. As indicated above, the proposed minimization options presented in the report were suggestions for discussion. Q Development proposed a third option, which has been rejected by DOMI on February 13, 2023. While we remain committed to finding a mutually agreeable solution, we disagree that the level of the proposed changes would substantially diminish the property's integrity.

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26	01/11/2023 Q Development Response Letter/ Page 3/Determination of Effects Report (December 2022) Response/Paragraphs 5-7	Rick Belloli	<p>While the impacts to the windows and the reduction in window openings are most significant, these changes are more than just the diminishment of the display window openings themselves but will also affect the limestone water table (base) of the building. As noted in the Identification of Historic Properties Report (September 2019) prepared for Norfolk Southern Railway Company, by Michael Baker International, Inc, the Pennsylvania Historic Resource Survey for the building highlights the architectural stature of the first floor: “The <i>limestone cladding visually forms a base on which the building rests</i>; comprised of a plinth course, scotia with fillet, and a beveled dado” (emphasis added). This is not by accident.</p> <p>William D. Price [architect of the 1912-13 enlargement of the building] emphasized a uniform look for International Harvester buildings to make them immediately recognizable: “Through an express wish of the management, these buildings have been made as nearly alike in appearance and design as the varying conditions of size, location, and surroundings would permit; the idea being that whether north, south, east, or west, their appearance would stamp them at once as ‘International... We have tried to make the buildings strong in appearance as well as in construction, and the exteriors, while plain and moderate as far as expense is concerned, have a substantial look which goes to prove that they are there to stay.’ ” (International Harvester Company of America: Pittsburgh Branch House, National Register Nomination page 61)</p> <p>The preferred Alternative approach to both the display window openings, limestone water table and the fronting sidewalk, ramps and retaining walls diminishes this intentional design, setting, feeling and association both directly and indirectly.</p>	See responses to comments 18, 21, and 25.
27	01/11/2023 Q Development Response Letter/ Page 3/Determination of Effects Report (December 2022) Response/Paragraphs 8-10	Rick Belloli	<p><u>Table 5-12 Examples of Adverse Effects:</u> (i) Physical destruction of or damage to all or part of the property;</p> <p><u>Evaluation:</u> Preferred Alternative would require the construction of window wells or shortening of three infilled first-floor display windows, which have been modified in the past, alternatives have been developed that would minimize damage to the historic property.</p> <p><u>Response:</u> Requiring any modification to the window wells or shortening of first floor display window openings is a clear admission that the Preferred Alternative diminishes the integrity, design, materials, feeling and association of the historic property.</p>	See responses to comments 18, 21, and 25. While the project will raise the sidewalk level and require some modifications through minimal changes to the display windows or the addition of a sidewalk window well or a switchback ramp, not all changes to historic properties rise to the level of adverse. The applicable aspects of integrity in this case are design and materials.

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28	01/11/2023 Q Development Response Letter/ Pages 3-4/Determination of Effects Report (December 2022) Response/Paragraphs 11-13	Rick Belloli	<p><u>Table 5-12 Examples of Adverse Effects:</u> (ii) Alteration of a property, including restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation and provision of handicapped access, that is not consistent with the Secretary’s Standards for the Treatment of Historic Properties (36 CFR§68) and applicable guidelines;</p> <p><u>Evaluation:</u> The Preferred Alternative would raise the street and sidewalk along the International Harvester Building for a distance of approximately 90’ consisting of 30’ ramp runs of 8.3% with two 5’ level landings. The ramp runs would be separated from the roadway with a proposed landscape area in order to maintain ADA-compliant access at the building’s existing entrance. No physical changes on the interior are required. Required exterior changes to the three display windows noted above will be executed in accordance with the SOI Standards.</p> <p><u>Response:</u></p> <ul style="list-style-type: none"> <li>• The proposed 90’ of ramps in three 30’ sections at 8.3% grade plus two 5’ landings are 100’ in length. Further, a code required 1’ handrail extension would also be required at each end, raising the total length needed to 102’.</li> <li>• The attached measured drawings demonstrate that the distance for 102’ of ramp and handrail is proposed for an area only 95’ in length. The Preferred Alternative does not fit. (Diagram 1: Allegheny Branch House Lofts site plan)</li> <li>• Even if the ramping could fit, the code-required handrail extension areas will interfere with operation of the existing front door.</li> <li>• Building code requires ramps at 8.3% grade to feature handrails on both sides. Incorporating these handrails and their impact on narrowing of the sidewalk has not been accounted for in the Preferred Alternative.</li> <li>• Further, the proposed sidewalk ramping and elevation do not comport with the City of Pittsburgh standards for required tree pits and landscaping. Accounting for 36” deep tree wells plus the handrails will substantially narrow the sidewalks from nearly 10’ to barely 5’ in width.</li> <li>• The statement that no physical changes on the interior is incorrect. Modifying the window openings and shortening them has an interior impact on the Character Defining Features of the windows. Compounding this negative impact, this location is the front lobby of the building, designed as a public gathering place and clubroom, affecting a greater number of visitors and individuals than in other areas of the building.</li> <li>• The Preferred Alternative does not comport with SOI Standards and will jeopardize \$2.5 million in historic tax credits approved for the project.</li> </ul>	<ul style="list-style-type: none"> <li>• The reference to a proposed 90’ length of ramps in three 30’ sections is to a previous optional sidewalk layout that was paired with a longer approach roadway option, and that was ultimately dismissed by DOMI due to the larger impact area of flatter slopes along the roadway. In the current design, the sidewalk in front of the International Harvester Building is separated from the roadway by a 50-foot narrow grassy or landscaped area, in order to bifurcate the slope of the roadway and the sidewalk. The 8.3% sidewalk slope occurs for a 30’ length with a 5’ landing area at the top and bottom of the 8.3% slope, for a total length of 40’. This sidewalk design avoids impact to the doorway of the International Harvester Building.</li> <li>• The application of the criteria of adverse effects takes into account the current condition of the building, not future plans. The proposed alternatives would not prohibit the enlargement of the window openings compared with current conditions.</li> <li>• If Q Development has input from the NPS or others that any of the proposed options for the sidewalk do not comply with SOI Standards or will jeopardize the reinvestment tax credits, please share that documentation with the project team.</li> </ul>

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29	01/11/2023 Q Development Response Letter/ Pages 4-5/Determination of Effects Report (December 2022) Response/Paragraphs 14-16	Rick Belloli	<p><u>Table 5-12 Examples of Adverse Effects:</u> (iv) Change of the character of the property’s use or of physical features within the property’s setting that contribute to its historic significance;</p> <p><u>Evaluation:</u> The Preferred Alternative would not change the historic property’s use. The project would not affect features that contribute to the property’s significance; the W. North Avenue Bridge and the existing modern streetscape elements do not contribute to the property’s setting.</p> <p>In addition, the narrative on page 114 states “Concrete stairs would be constructed to access the existing walkway along the building’s northeast façade, and a 27’ retaining wall with a protective fence would be constructed along W. North Avenue between the stairs and the new bridge.”</p> <p><u>Response:</u></p> <ul style="list-style-type: none"> <li>• While the Preferred Alternative will not change the historic use of the property, the use is changing as part of the ongoing SOI Standards-approved Allegheny Branch House Lofts redevelopment. The redevelopment of this and other nearby properties was called for in the 2007 Allegheny West Loft District Master Plan (Map 1, attached) as part of a revitalized residential district.</li> <li>• The building is individually listed, in part, for its architectural design and architectural integrity. The overall rise in the sidewalk from the front door to the newly elevated bridge would total 6’ (from 764’ at the door to 770’ at the bridge), but notably, only on one half of the front façade. <ul style="list-style-type: none"> <li>○ This unbalanced elevation negatively counters the architectural intent of International Harvester and its architect, William D. Price who designed and installed a balanced, solid base of Classical Revival style.</li> <li>○ The Preferred Alternative is a physical and visual intrusion to the substantial and continuous stone base upon which the building rests.</li> </ul> </li> <li>• The Preferred Alternative does not accommodate the required dimensions for tree plantings under city code and therefore contributes to significantly narrowing the sidewalk.</li> <li>• The 27’ retaining wall will impede access to the front lobby access along the east façade of the building. The proposed access stairs do not synchronize with the ramp elevations and access points to this area.</li> </ul>	<ul style="list-style-type: none"> <li>• The application of the criteria of adverse effect only takes into account the effects of the proposed undertaking. The adoption of a neighborhood master planning document by a community neighborhood organization is not relevant to the proposed undertaking and the assessment of the undertaking’s effects on historic properties.</li> <li>• The overall rise in the sidewalk as it follows the street grade is currently limited to only one half of the front façade.</li> <li>• The stated “balanced, solid base of Classical Revival style” was altered in 1929 and likely again in the 1940s as noted in the Determination of Effects Report. The front façade, as it exists today, is unbalanced; the water table and display windows are stepped from the building’s front doors to its east corner to follow the rise of the street grade.</li> <li>• The minimum sidewalk width meets City, AASHTO, and PennDOT criteria. The purpose of the landscaped area is to provide a buffer space and area between the sidewalk that is sloping at a steeper slope than the roadway is sloping. This is a more ideal scenario than a barrier wall between the sidewalk and roadway, which would be a further risk to pedestrians and vehicles, allow for additional space for the sloping and a wider buffer between pedestrians and vehicles in this space. It also cuts down on maintenance costs to the City, but landscaping would need to be coordinated as part of the DAT process.</li> <li>• The retaining wall and stairs to the loading dock area were preliminary design elements and can and will be further coordinated with the property owner and City in final design.</li> </ul>

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			<ul style="list-style-type: none"> <li>○ Further, it is also appropriate to note this is not “an existing walkway” but a remnant of the historic loading dock installed by International Harvester.</li> <li>○ The Pennsylvania State Historic Preservation Office (SHPO) noted that this loading dock remains a Character Defining Feature of the building, and required modifications to the rehabilitation plans to reflect its importance as part of the Part 2 approval of historic tax credits.</li> </ul>	
30	01/11/2023 Q Development Response Letter/ Page 5/Determination of Effects Report (December 2022) Response/Paragraphs 17-19	Rick Belloli	<p><u>Table 5-12 Examples of Adverse Effects:</u> (v) Introduction of visual, atmospheric, or audible elements that diminish the integrity of the property’s significant historic features;</p> <p><u>Evaluation:</u> The Preferred Alternative would not introduce atmospheric or audible elements that diminish the integrity of the historic property’s character-defining features. The visual effects of the project on the historic property will be minor. The new W. North Avenue Bridge, the raising of the street and sidewalk grade, the bifurcation of a modern sidewalk, and the alteration of recent landscape elements would not result in a substantial visual change within the viewshed of the historic property.</p> <p><u>Response:</u></p> <ul style="list-style-type: none"> <li>• As noted and documented above, the Preferred Alternative will introduce visual features that will diminish the historic features of the building, including: <ul style="list-style-type: none"> <li>○ the elevated sidewalk;</li> <li>○ the required ramps and railings;</li> <li>○ the retaining walls;</li> <li>○ the reduction in size of the existing display window openings;</li> <li>○ and restructuring the previously balanced water table elements.</li> </ul> </li> <li>• Audible impacts to the historic property include the 65% increase in rail traffic (Pittsburgh Vertical Clearance Project Open House, Frequently Asked Questions, Tuesday, June 26, 2018).</li> <li>• Without the redesign of the bridge, the rail traffic quantity, length of trains, or audible impacts would be de minimis.</li> <li>• These audible impacts are counter to the 2007 Loft District Master Plan, which predates the Vertical Clearance Project by a decade and a half.</li> </ul>	<p>See responses to comments 18, 21, and 25.</p> <ul style="list-style-type: none"> <li>• Visual changes will be minor. Water table elements are not currently balanced; and the limestone elements can be retained to incorporate the “classical base” elements into the new design. Though shortened, the storefront openings would still read as display windows. If interior window size must be maximized, window wells can be utilized.</li> <li>• The project’s Preferred Alternative would reduce projected train traffic when compared with the No Build scenario. The audible impacts at this location are de minimis under both the Preferred Alternative and No Build scenarios. The number and length of trains would increase under the No Build scenario.</li> <li>• The adoption of a neighborhood master planning document by a community neighborhood organization is not relevant to the proposed undertaking and the assessment of the undertaking’s effects on historic properties.</li> </ul>
31	01/11/2023 Q Development Response Letter/ Pages 5-6/Determination of Effects Report (December 2022) Response/Paragraphs 20-21	Rick Belloli	<p><u>Table 5-12 Examples of Adverse Effects:</u> FINDING: The W. North Avenue Bridge Project results in a finding of No Historic Properties Adversely Affected for the International Harvester Building under the Preferred Alternative. (Note: a similar Finding was in Table 5-10 regarding the Allegheny Second Ward Industrial Historic District, of which the International Harvester building is a contributing asset. This rebuttal applies to both Findings.)</p>	

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			<p><u>Response:</u></p> <ul style="list-style-type: none"> <li>• As evidenced by the responses above to Sections i, ii, iv, and v, this finding is incorrect.</li> <li>• The NRHP-listed International Harvester property is subject to significant Adverse Effects under the Preferred Alternative.</li> <li>• The Pennsylvania State Historic Preservation Office conveyed several similar concerns in their December 13, 2022, letter (attached). Notably: <ul style="list-style-type: none"> <li>○ that pedestrian needs at this location and alternatives [be] considered to avoid alterations to the façade of the International Harvester Building;</li> <li>○ that introduction of new visual elements along W. North Avenue in the immediate setting of the International Harvester Building [are a concern];</li> <li>○ that previous infill of the windows and changes to the water table of the International Harvester Building were carried out during the period of significance for the resource (1902-1933).</li> </ul> </li> <li>• The SHPO letter further noted that “the alternative that involved the replacement of the bridge and lowering of the railroad tracks to achieve 22’ vertical clearance alternative was dismissed, as it would appear this alternative would have minimized impacts to adjacent historic properties.”</li> <li>• The Preferred Alternative jeopardizes \$2.5 million in federal Rehabilitation Investment Tax Credits as approved in the August 9, 2022, Part 2 approval</li> </ul>	<ul style="list-style-type: none"> <li>• Pedestrian needs are being designed in compliance with applicable design standards.</li> <li>• New visual elements—a new roadway bridge to replace the existing structurally deficient and load-posted bridge—is being designed with input from consulting parties and other stakeholders to ensure that context-sensitive design solutions are integrated into the final design.</li> <li>• However, the 1960s concrete block infill does not date to the period of significance. Nor do modifications made during the second raising of the street grade in the 1940s. Like the previous modifications to the water table, which are described as “compatible” in the NRHP nomination, so too would the changes be suggested under the preferred alternative. Norfolk Southern will continue to work with Q Development and DOMI to refine alternatives to minimize effects to historic properties.</li> <li>• The lowering alternatives would cause major impacts to buried utilities and would significantly impact the Allegheny Commons Historic District and the Pennsylvania Railroad: Main Line (Pittsburgh to Ohio State Line) Railroad Corridor Historic District including the retaining walls and ginkgo trees.</li> <li>• If Q Development has input from the NPS or others that any of the proposed options for the sidewalk do not comply with SOI Standards or will jeopardize the reinvestment tax credits, please share that documentation with the project team.</li> </ul>
32	01/11/2023 Q Development Response Letter/ Page 6/Minimization and Mitigation: Vertical Clearance Alternatives /Paragraphs 1-4	Rick Belloli	<p>The December 2022 Norfolk Southern Pittsburgh Vertical Clearance Projects Alternatives Analysis Report provides multiple options that would not have an Adverse Effect on the NRHP-listed International Harvester building. Alternative 3— Replace bridge and lower railroad tracks to achieve 22’ vertical clearance is clearly the least impactful to the property and its historic features. Alternative 4— Combination replace and raise bridge and lower railroad tracks to achieve 22’ vertical clearance also minimizes the Adverse Effects to the building and site. Both Alternatives should be more closely evaluated and reconsidered.</p> <p>Most importantly, the Design Modification of replacing the bridge to a 21’ 4” vertical clearance is a start but remains insufficient. The W. North bridge elevation is not the limiting factor for rail service along this line. Other work within the Pittsburgh Vertical Clearance Project is <i>more</i> limiting to rail traffic. Of the five</p>	<p>While the mentioned alternatives may have had less effect on the International Harvester Building, the alternatives had significant effects on other historic properties. The requirement for vertical clearance per the PUC in Pennsylvania is 22’-0”. The overall goal of the Pittsburgh Vertical Clearance Projects is to satisfy the requirements of the PUC and give consideration to adjacent infrastructure and resources. Each location was designed to provide the maximum clearance possible while minimizing impacts, so each location was evaluated based on those considerations. Most design manuals give a preferred height or width along with a minimum height or width, depending on the criteria. It is typical practice to design with buffer, especially when approaching the minimum to allow for construction tolerances, future surfacing, etc. This will ensure that the 21’-0” clearance is never violated.</p>

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			<p>project activities, the proposed vertical clearance modifications will cause the <i>second highest clearance</i> at W. North Avenue, indicating that the overall elevation of the bridge work can be reduced several more inches, mitigating the impact on the Allegheny Branch House Lofts. The Determination of Effects Report states that double-stack rail cars are 20' 3" in height, and therefore 21' still provides an extra 9" of clearance for these vehicles.</p> <p>The clearances planned for the project are:</p> <ul style="list-style-type: none"> <li>• Washington Avenue: 21' 9"</li> <li>• <b>Amtrak Station: 21' 0" (emphasis added)</b></li> <li>• W. North Avenue: 21' 4"</li> <li>• <b>Pennsylvania Avenue: 21' 2" (emphasis added)</b></li> <li>• <b>Columbus Avenue (Option 3A): 21' 1" (emphasis added)</b></li> </ul> <p>For each inch of elevation, the resulting grade change can be reduced by one foot in length and impact. So, selecting a clearance of 21' 4" rather than 21' 0" unnecessarily results in additional impacts to the roadway, the sidewalk, retaining walls, and most importantly to the Adverse Effects upon the historic property. Further, Alternative 4 considers lowering the tracks by six inches. Combined, lowering the track and reducing the clearance height to 21' 0" could have a dramatic diminution to the Adverse Effects of the proposed work, as the overall grade change to the sidewalk and W. North Avenue could be reduced by nearly a foot, from 2' 6" to only 1' 8".</p>	<ul style="list-style-type: none"> <li>• <b>Washington Avenue:</b> The vertical clearance for the track lowering option is 21' 9" because this was the maximum clearance that could be achieved without impacting the retaining walls and bridge substructure.</li> <li>• <b>Amtrak Station:</b> The Amtrak Station vertical clearance was developed for 21'-0" because this was the maximum clearance that could be achieved without impacting the roof and the brick wall along Liberty Avenue, which is a contributing element of the Pennsylvania Railroad Historic District.</li> <li>• <b>W. North Avenue:</b> 21'-4" is proposed instead of 22'-0" to reduce the number and extent of property impacts (8 with 21'-4" vs. 11 with 22'-0"), to reduce the number of building entrances impacted, and to reduce the overall construction limits and associated impacts along W. North Avenue and Brighton Road. As we go through the detail design process and finalize the structure details, we may be able to reduce further.</li> <li>• <b>Pennsylvania Avenue:</b> 21'-2" is proposed instead of 22'-0" to eliminate impacts to a 30" PWSA water main and a Duquesne Light primary, to reduce the extent of sidewalk modification required at 901 Pennsylvania Avenue, a contributing element of the NRHP-eligible Allegheny Second Ward Industrial Historic District, and to avoid replacement of retaining walls, which are contributing elements of the railroad corridor historic district that would be necessary with additional track lowering.</li> <li>• <b>Columbus Avenue (Option 3B is the preferred option):</b> 21'-6" is the proposed clearance for this track lowering project. This clearance is to reduce impacts to adjacent tracks and undercutting the abutment and retaining walls adjacent to the tracks. However, we are early in the design and need survey to determine the exact clearance moving forward.</li> </ul>
33	01/11/2023 Q Development Response Letter/ Page 6/Minimization and Mitigation: <i>Acoustic Impacts/ Paragraphs 1-2</i>	Rick Belloli	<p>To minimize the Adverse Effect acoustic impacts to the NRHP-listed International Harvester building, it is suggested that a 48" vertical retaining wall be constructed adjacent to the existing railroad corridor bridge. The installation of this wall will deflect much (though not all) of the additional noise around the building from the louder, longer and increased rail traffic. See attached Diagram 2 for the proposed location of acoustic barrier.</p> <p>Secondarily, we suggest installing 67 acoustic windows (of 159 windows total) on the east façade of the building could counter the increased acoustic impacts to the property. This approach works to mitigate the acoustic impacts after they come into contact with the building (rather than deflecting around it as above).</p>	<p>No auditory impacts that would rise to a level of an adverse effect on historic properties would result from the implementation of the proposed undertaking as demonstrated in the Draft Noise and Vibration Technical Report (HMMH 2022). Therefore, no noise walls will be constructed as part of this undertaking. Under the Preferred Alternative, auditory impacts would be less than under the No Build Alternative.</p> <p>If Q Development feels that its tenants would benefit from sound-insulating windows, then such units should be installed as part of the residential conversion of the building.</p>
34	01/11/2023 Q Development Response Letter/ Page 7/Minimization and Mitigation: <i>Sidewalk Design Alternatives/ Paragraphs 1-2</i>	Rick Belloli	<p>The June 26, 2018 Open House presented alternative considerations to the Preferred Alternative regarding sidewalk and roadway configurations. These sidewalk configurations have the greatest minimization of Adverse Effects to the International Harvester building and are easily resolved. "Alternate 2A Switchback Ramp" is the most successful in resolving many of the Adverse Effects (Map 2, attached).</p>	<p>The City of Pittsburgh (DOMI) ultimately dismissed Alternate 2A citing concerns over the change in the direct route of pedestrians by creating a need to veer onto a ramp that is located outside of the City's right-of-way. The City also cited concerns over the bifurcation of the roadway and sidewalk with a barrier wall due to maintenance costs and safety issues. Alternate 2A was dismissed due to the comments from the City, impacts to Rope Way from the increased project length, and impacts to additional properties along W. North Avenue and Brighton Road.</p>



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			<p>The Q Development team has reviewed Alternate 2A and has proposed modifications to further minimize the potential Adverse Effects (Rendering 1 and Diagram 3 attached). These refinements accomplish:</p> <ul style="list-style-type: none"> <li>• Minimize grade changes along the sidewalk separate from the roadway <ul style="list-style-type: none"> <li>○ Separating the sidewalk and the roadway remains consistent with Alternate 2A and the Preferred Alternative;</li> </ul> </li> <li>• Provide ADA accessibility via the switchback ramp with slope reduced from three 8.3% sections to one 8.1% and one 7.7% sections;</li> <li>• The switchback ramp allows the balance of the sidewalk plan to fit within the 95' sidewalk distance to the front door, contrary to the Preferred Alternative;</li> <li>• Extensive railings on both sides of the sidewalk are unnecessary, and don't reduce the sidewalk width or have a negative visual impact to the historic property;</li> <li>• Access to the historic loading dock/front lobby entry is preserved in an acceptable manner;</li> <li>• No further adjustment to the water table is required;</li> <li>• No reduction in window opening size is required, preserving both the exterior and interior experience of the historic display window openings;</li> <li>• Most important, this approach likely preserves the viability of the \$2.5 million in Rehabilitation Investment Tax Credits approved by the National Park Service on August 9, 2022.</li> </ul>	
35	01/11/2023 Q Development Response Letter/ Page 7/Paragraph 1	Rick Belloli	<p>I look forward to further engagement as a Consulting Party for the NRHP-listed International Harvester building at 810 W. North Avenue. Notwithstanding our desire to reach a mutually agreeable understanding, however, Q Development reserves all rights and remedies, including commencing appropriate legal action if the Railroad Project is not changed to preserve the approved and allocated tax credits supporting the redevelopment of Allegheny Branch House Lofts.</p> <p>Please contact me with any questions or feedback in response to this letter.</p>	Noted.
36	01/13/2023 PA SHPO Response Letter/ Page 1/Above Ground Resources/ Paragraph 1	Emma Diehl/ Barbara Frederick	We request a written response to our questions regarding the Determination of Effect Report outlined in our letter of December 13, 2022. In addition, we offer the following comments, for consideration and response, regarding the December 14, 2022 Consulting Party Meeting, Alternatives Analysis Report, and the January 11, 2023 letter from Q Development.	All responses are contained within this document.
37	01/13/2023 PA SHPO Response Letter/ Page 1/December 14, 2022, Consulting Party Meeting/ Paragraph 1	Emma Diehl/ Barbara Frederick	At the December 14, 2022 consulting party meeting, the specific clearances at each of the five obstruction locations identified in the report was briefly discussed. While the project's purpose and need indicates the PUC requirement for vertical clearances is 22'-0", with waivers, the specific level of vertical clearance required at each of the five locations is unclear. The clearances proposed for the preferred alternatives presented in the Alternatives Analysis and Effect Reports are as follows, ordered from least to greatest amounts: 21'-0" at the Amtrak Station; 21'-1" at Columbus Avenue Bridge; 21'-2" at the Pennsylvania Avenue Bridge; 21'-4" at the West North Avenue Bridge; and 21'-9" at the Washington Avenue Bridge. As	See response to comment 32 above.

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			outlined in our letter of December 13, 2022, we require more detailed information on the specific requirements of each of the five obstruction locations. Given lower clearances at other obstruction locations, can the height clearances of the preferred alternatives for those locations where there is the potential for an adverse effect (West North Avenue Bridge and Pennsylvania Avenue Bridge) be reduced to minimize impacts to the adjacent historic properties?	
38	01/13/2023 PA SHPO Response Letter/ Pages 1-2/December 14, 2022, Consulting Party Meeting/ Paragraph 2	Emma Diehl/ Barbara Frederick	Also at the December consulting party meeting, there was discussion of construction of a pedestrian bridge that would connect the two sides of Allegheny Commons, now separated by the railroad. We understand the pedestrian bridge is to be constructed before work at the obstruction locations. To date we have received no information on this part of the project and request consultation including: a purpose and need statement, mapping of the proposed project and Area of Potential Effect (APE), photographs of the APE, plans or specifications, including proposed design and materials. In addition, what are the potential effects of this bridge project on the National Register of Historic Places (National Register)-listed Allegheny Commons Historic District? Has there been any public feedback on the proposed pedestrian bridge and its potential to affect Allegheny Commons? What efforts have been made to minimize effects of the pedestrian bridge on historic properties?	The pedestrian bridge is being proposed as a mitigation measure. The Allegheny Commons Master Plan calls for the reconstruction of the pedestrian bridge over the railroad corridor that was removed more than a decade ago. Allegheny Commons stakeholders have studied bridge replacement alternatives over the past two decades. After project effects and mitigation commitments have been formalized, a Design Advisory Team (DAT) will be formed to guide the construction of the pedestrian bridge and ensure that effects on Allegheny Commons are minimized. PA SHPO will be invited to participate in DAT consultation. The design of the pedestrian bridge will also have to be vetted by the City of Pittsburgh's Art Commission and Historic Review Commission. It is proposed that the details of the pedestrian bridge be presented in an addendum to the current effects report.
39	01/13/2023 PA SHPO Response Letter/ Page 2/Alternatives Analysis Report and Assessment of Effect: Washington Avenue Bridge/Paragraph 1	Emma Diehl/ Barbara Frederick	Of the alternatives considered, we agree that the preferred alternative (alternative 3 with design modifications) best minimizes effects to the Pennsylvania Railroad: Main Line (Harrisburg to Pittsburgh) Railroad Corridor Historic District as this alternative would not require work that might affect buildings or driveway entrances on Washington Avenue. (This area was not previously identified as a historic district, but the Alternatives Analysis report indicates there may be the potential for a district at this location). Contributing features that will be affected by the preferred alternative include the superstructure and substructure of the Washington Avenue Bridge, adjacent stone retaining walls along Palmer Street and Washington Avenue, and decorative wrought iron fencing. If the plans and specifications provide for protection of these contributing features during exposure and construction as well as commit to restoration of the affected portions of the features to match the old in size, scale, design, color, finishes, materials, and construction techniques, we agree the project should not adversely affect the Pennsylvania Railroad: Main Line (Harrisburg to Pittsburgh) Railroad Corridor Historic District.	Noted.
40	01/13/2023 PA SHPO Response Letter/ Page 2/Alternatives Analysis Report and Assessment of Effect: Amtrak Station/ Paragraph 1	Emma Diehl/ Barbara Frederick	Of the alternatives considered, we agree that the preferred alternative (alternative 3) best minimizes effects to the Pennsylvania Railroad Station and the Pennsylvania Railroad: Main Line (Harrisburg to Pittsburgh) Railroad Corridor Historic District. Alternative 3 accommodates historic preservation concerns alongside the project purpose and need by accommodating vertical clearance needs through limited modifications to the girders and exhaust shoots at Tracks 1 and 2 of the trainshed rather than removal of entire portions of the trainshed (alternative 2). The changes will be compatible with existing materials and features, and the original construction techniques and craftsmanship will be visible elsewhere within the structure. Therefore, we agree the preferred alternative should not adversely affect	Noted.

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			the Pennsylvania Railroad Station and the Pennsylvania Railroad: Main Line (Harrisburg to Pittsburgh) Railroad Corridor Historic District.	
41	01/13/2023 PA SHPO Response Letter/ Page 2/Alternatives Analysis Report and Assessment of Effect: Amtrak Station/ Paragraph 2	Emma Diehl/ Barbara Frederick	We agree the preferred alternative does not have the potential to affect The Rotunda of the Pennsylvania Railroad Station.	Noted.
42	01/13/2023 PA SHPO Response Letter/ Page 2/Alternatives Analysis Report and Assessment of Effect: West North Avenue Bridge/ Paragraph 1	Emma Diehl/ Barbara Frederick	The preferred alternative (alternative 2 with design modifications) proposes removal of the entire superstructure, replacement with a single-span prestressed concrete spread box beam of greater width, an increase in the height and length of abutments, and an increased vertical grade at both the bridge and its approaches to accommodate a height of 21'-4". Alternative 3, which had lesser impacts to historic properties, was dismissed in the Alternatives Analysis Report as it would reduce the number of tracks through the area from four to three. While we understand replacement of the bridge is needed and there will be an adverse effect to the Pennsylvania Railroad: Main Line (Harrisburg to Pittsburgh) Railroad Corridor Historic District, it is necessary to ensure adequate consideration of alternatives that avoid or minimize potential adverse effects to historic properties.	The adverse effect is resulting from the need to replace a structurally deficient bridge that is a contributing element of the railroad corridor historic district. A Historic Bridge Rehabilitation Analysis (HBRA) Report determined that while the bridge could be rehabilitated, the rehabilitation options would not meet SOI Standards given the amount of replacement members that would be required. Secondary effects of the bridge replacement project include alterations to a portion of the concrete retaining wall with stone coping to accommodate an expanded northeast abutment required for the larger bridge footprint. Sections of decorative wrought iron fencing matching that in the Allegheny Commons Park will be incorporated on the bridge and the approaches in an effort to minimize adverse effects to the railroad corridor historic district and to minimize effects to surrounding historic properties. Final minimization components will be decided upon by the aforementioned Design Advisory Team and vetted by the City of Pittsburgh's Art Commission and for those components within the Allegheny Commons Historic District, by the Historic Review Commission.
43	01/13/2023 PA SHPO Response Letter/ Pages 2-3/Alternatives Analysis Report and Assessment of Effect: West North Avenue Bridge/Paragraph 2	Emma Diehl/ Barbara Frederick	Within the Pennsylvania Railroad: Main Line (Harrisburg to Pittsburgh) Railroad Corridor Historic District, alternative 2 with design modifications would affect the bridge superstructure, substructure, retaining walls, and fencing as well as an out-of-service railroad siding, all contributing features. As outlined in our letter of December 13, 2022, please provide more information on the proposed replacement structure, plans for the reconstruction or restoration of contributing features, and a discussion of potential effects to the railroad siding.	See response to comment 12 above regarding the selection of the bridge type. See response to comment 8 above regarding plans for the reconstruction or restoration of contributing features and the potential for effects to the out-of-service railroad siding.
44	01/13/2023 PA SHPO Response Letter/ Page 3/Alternatives Analysis Report and Assessment of Effect: West North Avenue Bridge/ Paragraph 3	Emma Diehl/ Barbara Frederick	Within the Allegheny Commons Historic District, alternative 2 with design modifications has the potential to adversely affect the park through the introduction of new features including a new bridge, sidewalk replacement and toe wall construction, changes to the bus shelter, and replacement of the existing retaining wall and railing along the east side of Brighton Road. Please provide further detail on consideration of minimization of the effects of the design on these and other contributing features in the park. Please include a more detailed discussion of the potential for cumulative visual effects on the park including renderings showing the proposed new features in the setting of the historic district.	See response to comment 10 above. The W. North Avenue Bridge is adjacent to, but outside of, the Allegheny Commons Historic District (ACHD) NRHP boundary; it is not a contributing element of the district. The bridge will be designed with context-sensitive elements that minimize the effect on the ACHD and that incorporate design elements from the newly constructed W. Ohio Street Bridge in order to create a similar design for all railroad bridges in and adjacent to the ACHD. The existing poured concrete sidewalks will be replaced in-kind. The existing retaining wall (toe wall) and railing along the east side of Brighton Road (noncontributing elements of the ACHD) were constructed along with the 1929 bridge and will be replaced. Instead of replicating the 1929 railing, it is proposed that the railing match that of the decorative wrought iron fencing bordering the railroad corridor. The bus shelter would be raised between 1 inch or less.

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				Renderings of these proposed changes are included in the Determination of Effects Report. Figure 5-36 is a rendering showing the proposed W. North Avenue Bridge with the decorative wrought iron railings from within the ACHD. Figure 5-40 is a rendering of the northwest corner of the park showing the elevated sidewalk, the proposed W. North Avenue Bridge with the decorative wrought iron railings, and the bus shelter at a slightly higher elevation. Figure 5-42 is a rendering of the proposed toe wall and decorative wrought iron railing along the east side of Brighton Road (existing toe wall and iron fence are shown in Figure 5-41). Figure 5-49 is a rendering showing the minimal fill slopes south of the bridge, the reconstructed toe wall and railing, and the proposed W. North Avenue Bridge with decorative wrought iron railings from within the ACHD.
45	01/13/2023 PA SHPO Response Letter/ Page 3/ Alternatives Analysis Report and Assessment of Effect: West North Avenue Bridge/ Paragraph 4	Emma Diehl/ Barbara Frederick	To accommodate the increased grade, alternative 2 with design modifications proposes changes to the International Harvester Building, individually listed in the National Register and a contributing feature to the National Register-eligible Allegheny Second Ward Industrial Historic District. The windows and water table are character-defining features of the International Harvester Building, and alterations to the openings and appearance of the front elevation as part of the preferred alternative have the potential to affect integrity and adversely affect the resource and district. The loading dock adjacent to the railroad siding is also a character defining feature that has the potential to be affected by the current design. In addition, we are concerned about the introduction of new features (elevated sidewalk, ramps, railings, and a retaining wall) at the primary façade.	See responses to comments 18, 21, and 25. The option to minimally shorten three currently infilled window openings and raise the limestone water table is one of three suggested options. The proposed retaining wall replaces an existing retaining wall at the southern terminus of the elevated rail siding. The retaining wall will not be visible from street grade and will be topped by decorative wrought iron fencing see renderings in Figure 5-38 and Figure 5-46 in the Determination of Effects Report. The only proposed change to the loading dock is to replace an existing ramp (altered in 1929 and likely the 1940s) with a stair in order to maintain pedestrian access. This alteration can be eliminated by extending the fence atop the retaining wall at the southern end of the loading dock and removing pedestrian access from the sidewalk at this location. This is also the area under sidewalk option three where a switchback ramp has been proposed by Q Development.
46	01/13/2023 PA SHPO Response Letter/ Page 3/Alternatives Analysis Report and Assessment of Effect: West North Avenue Bridge/Paragraph 5	Emma Diehl/ Barbara Frederick	Further documentation and consideration of alternatives that limit changes to the Pennsylvania Railroad: Main Line (Harrisburg to Pittsburgh) Railroad Corridor Historic District, the Allegheny Commons Historic District, the International Harvester Building, and the Allegheny Second Ward Industrial District is required. This should include reconsideration of the amount of vertical clearance needed at this obstruction location, a clear understanding of the pedestrian and ADA accessibility requirements adjacent to the International Harvester Building, and consideration of alternative designs that accommodate the increased vertical grade of the bridge approaches.	See responses to comments 4, 11, and 32 regarding vertical clearance needs. See responses to comments 4, 9, 28, 29, and 34 regarding pedestrian and ADA accessibility requirements  See responses to comments 9, 28, 34 regarding alternate designs to accommodate the increase vertical grade of the bridge approaches, which were dismissed by DOMI.
47	01/13/2023 PA SHPO Response Letter/ Page 3/Alternatives Analysis Report and Assessment of Effect: Pennsylvania Avenue Bridge/ Paragraph 1	Emma Diehl/ Barbara Frederick	Of the alternatives considered, alternatives 2 with design modifications (preferred) and 4 best minimize effects to the Pennsylvania Railroad: Main Line (Harrisburg to Pittsburgh) Railroad Corridor Historic District as they do not require buttressing of the concrete retaining walls that line the railroad historic district (alternative 3).	Noted.
48	01/13/2023 PA SHPO Response Letter/ Page 3/Alternatives Analysis Report and Assessment of Effect: Pennsylvania Avenue Bridge/ Paragraph 2	Emma Diehl/ Barbara Frederick	The bridge superstructure and substructure do not contribute to the significance of the railroad district as they were replaced after the period of significance of the railroad. To minimize changes to the railroad district, a steel pony truss similar in scale and configuration to the original ca. 1905 pony truss bridge is proposed. Contributing features that will be affected include the concrete retaining walls with stone coping, safety railings, and decorative wrought iron fencing. If the plans and	Any repairs to the concrete retaining walls with cut stone coping, safety railings, and decorative wrought iron fencing will be carried out in accordance with the SOI Standards. These commitments will be included in the stipulations of the projects' MOU; details of how these measures will be carried out by the project's contractors will be detailed in the project plan sheets and specifications.

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			specifications provide for protection of these contributing features during construction as well as commit to restoration of the affected walls and fencing to match the old in size, scale, design, color, finishes, materials, and construction techniques, we agree the project should not adversely affect the Pennsylvania Railroad: Main Line (Harrisburg to Pittsburgh) Railroad Corridor Historic District.	
49	01/13/2023 PA SHPO Response Letter/ Pages 3-4/Alternatives Analysis Report and Assessment of Effect: Pennsylvania Avenue Bridge/Paragraph 3	Emma Diehl/ Barbara Frederick	Both alternative 2 with design modification (preferred) and alternative 4 would require modifications to the bridge approaches resulting in the introduction of new features into the setting of 901 Pennsylvania Avenue, a contributing feature in the Allegheny Second Ward Industrial Historic District. These new features will include a bifurcated sidewalk with handicap ramp and handrail. As currently designed, to accommodate the ramp, it will be necessary to cover over a portion of the brick side wall (up to 11" high) of 901 Pennsylvania Avenue. Further information is required before we can comment on the potential for the project to adversely affect the Allegheny Second Ward Industrial District. Please provide specifications for the pedestrian and ADA accessibility requirements adjacent to 901 Pennsylvania Avenue and discuss efforts made to minimize effects to 901 Pennsylvania Avenue.	All sidewalks within the project area are designed to ADA, PennDOT and AASHTO Standards, as referenced above in the response to comment 4. Minimization efforts to reduce effects to 901 Pennsylvania Avenue were considered by increasing the vertical grade on Pennsylvania Avenue. The original design extended several hundred additional feet along Pennsylvania Avenue and included a like amount of sidewalk raising along 901 Pennsylvania Avenue. Also, by utilizing a bifurcated sidewalk ramp to the building provides ADA-compliance access to the building's existing entry without requiring any alterations to the building's facade. As noted above, all of the building's first-floor window units along Pennsylvania Avenue have been infilled with brick; the raising of the sidewalk to a one-foot maximum will not require any alterations to the building's facade. See response to comment 15 for additional information.
50	01/13/2023 PA SHPO Response Letter/ Page 4/Alternatives Analysis Report and Assessment of Effect: Columbus Avenue Bridge/Paragraph 1	Emma Diehl/ Barbara Frederick	Of the alternatives considered, we agree that the preferred alternatives (3A with design modification or 3B with design modification) best minimize effects to the Pennsylvania Railroad: Main Line (Harrisburg to Pittsburgh) Railroad Corridor Historic District. The 1907 superstructure has lost integrity of design and workmanship and does not contribute to the district. While work to contributing features of the district (bridge substructure, retaining walls, and iron fencing) is proposed, the preferred alternatives eliminate the need for work along Columbus Avenue and potential impacts to the 1907 Columbus Avenue approach ramp, another contributing feature to the district. If the project plans and specification provide for protection for the substructure, adjacent concrete retaining walls and fencing during construction as well as commit to restoration of those features that are affected during construction by matching the old in size, scale, design, color, finishes, materials, and construction techniques, we agree the project should not adversely affect the Pennsylvania Railroad: Main Line (Harrisburg to Pittsburgh) Railroad Corridor Historic District.	Noted. Any repairs to the bridge's substructure units, retaining walls, and iron fencing will be carried out in accordance with the Secretary of the Interior's Standards (SOI Standards). These commitments will be included in the stipulations of the projects' memorandum of understanding (MOU); details of how these measures will be carried out by the project's contractors will be detailed in the project plan sheets and specifications as part of the final design process.
51	01/13/2023 PA SHPO Response Letter/ Page 4/January 11, 2023, Q Development Response Letter/ Paragraph 1	Emma Diehl/ Barbara Frederick	We have reviewed the comments on the Determination of Effect Report provided by Q Development on January 11, 2023. For the West North Avenue Bridge Project, we echo their concerns about the potential adverse effect to the International Harvester Building as the alterations to the building are not in keeping with the Secretary of the Interior's Standards. At this time, it is unclear if these changes would jeopardize the \$2.5 million in Rehabilitation Investment Tax Credits approved by the National Park Service in August of 2022. We would also like to request consideration of alternative sidewalk designs to minimize effects to the International Harvester Building, including those provided by Q Development in their response letter.	See responses to comments 18, 21, and 25. The sidewalk design option provided by Q Development that incorporates a ramp within the pedestrian thruway on the east side of the building and steps within the public right-of-way was rejected by DOMI in an email dated February 13, 2023.

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52	01/13/2023 PA SHPO Response Letter/ Page 4/January 11, 2023, Q Development Response Letter/ Paragraph 2	Emma Diehl/ Barbara Frederick	Regarding the noise wall requested by Q Development, please note, we have concerns about the potential visual effects as it will introduce new features into the setting of several historic properties.	A noise wall will not be constructed as part of the W. North Avenue Bridge Project. See response to comment 33 above.
53	01/13/2023 PA SHPO Response Letter/ Page 4/[Closing]/ Paragraph 1	Emma Diehl/ Barbara Frederick	In conclusion, this letter should not preclude consideration of any comments provided by local consulting parties. Please share our comments with the local consulting parties and continue to provide copies of any comments from other consulting parties to our office. We look forward to additional consultation to avoid, minimize, and mitigate for adverse effects to historic properties.	Any additional consulting party correspondence will be shared with consulting parties and uploaded to PA-SHARE.