



# Pennsylvania State Historic Preservation Office

PENNSYLVANIA HISTORICAL AND MUSEUM COMMISSION

April 30, 2020

Timothy Zinn  
Michael Baker International, Inc.  
100 Airside Drive  
Moon Township PA 15108

ER 2018-1595-003-J: PennDOT Multimodal, Norfolk Southern Railway Company, Pittsburgh Vertical Clearance Projects, Pittsburgh, Allegheny County, Merchant Street Bridge, Determination of Effect Report and Consulting Party Meeting #3 Notes

Dear Mr. Zinn,

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

## **Above Ground Resources**

We are in receipt of the Determination of Effect Report for the Merchant Street Bridge, received on Wednesday, March 18, 2020. On April 29, 2020, we also received the draft meeting notes from the April 20, 2020 consulting party meeting (meeting # 3) which included a presentation and discussion of the assessment of effect and mitigation for the Market Street Bridge.

## *Consulting Party Coordination*

The PASHPO is requesting a written response to concerns raised at the April 20, 2020 consulting party meeting specific to the APE and project purpose and need, as outlined below.

## Area of Potential Effect

The consulting parties requested consideration of an expansion of the APE to address potential noise, air quality, and visual impacts related to the increase in the frequency of freight running along the entire Pittsburgh Vertical Clearance Project Corridor. The APE is discontinuous and limited to those nine locations (including Merchant Street) where the raising or removal of obstructions or minor track lowering is required to allow for double stacking of freight. The discontinuous APE includes all potential physical impacts, including track and obstruction improvements and construction activity and staging areas. Potential changes in height (raising or lowering) at the nine locations varies from 6" to 30", and associated potential visual effects are accounted for in the May 2018 report.

The proposed project includes planned increases in the number of trains, thereby resulting in increases in noise and emissions. However, the May 2018 report does not provide a discussion of changes in noise or air quality associated with increased freight traffic. Please provide documentation of consideration of the potential increases of noise and emissions associated with the Pittsburgh Vertical Clearance Project and the associated indirect effects on historic properties along the corridor, and if necessary, revise the APE.

## Project Purpose and Need

The intention of the review process conducted under the State History Code and implementing regulations of the Section 106 is to ensure the project purpose and need is considered alongside potential effects to historic properties during project planning. The purpose and need of the Merchant Street Bridge Project is to maintain safe interstate freight rail operations along the Fort Wayne Line to continue the efficient transportation of goods between Chicago and the New York/New Jersey commercial markets. The Merchant Street Bridge requires replacement due to safety and reliability concerns related to its deteriorated condition. An additional need was identified in the January 2020 Historic Bridge Rehabilitation Analysis Report: the City and the Public Utility Commission (PUC) have requested the roadway profile at Merchant Street be lowered to allow taller vehicles to pass under the bridge.

At the April 20, 2020 meeting, it was acknowledged that decisions related to the proposed design of the Merchant Street Bridge are constrained by design decisions at other obstruction points along the corridor where the vertical clearance project is proposed. Specific concerns expressed by the consulting parties include the need to finalize decision making for the height of the North Street Bridge (currently part of a PUC-initiated mediation) and how that will affect the elevation of the Merchant Street Bridge, the selection of preferred alternatives, and potential project effects on historic properties. In addition, should lowering be pursued at Merchant Street, the cost of relocating utilities under the roadway at the bridge has not been presented. The undetermined height requirement and other factors at Merchant Street have the potential to affect the design of the new structure and adjacent features. This includes the stone-faced retaining wall that runs along Merchant Street, associated with the early twentieth-century grade-separation project.

### *Determination of Effect Report and Mitigation Measures*

In our opinion it would be prudent to wait to advance the project design and assessment of project effects on historic properties at Merchant Street until the height requirement of other bridges along the vertical clearance corridor is known. At the April 2020 consulting party meeting the local consulting parties expressed an interest in measures to minimize visual effects to the community through an increase in the height of the retaining wall that runs along the railroad and the addition of landscaping along the railroad corridor. The retaining wall and the decorative fencing atop it are contributing features to both the railroad corridor district and the Allegheny Commons Historic District. If elevation of the retaining wall is introduced into the project design, then it will be necessary to reassess the potential effect of the project on both historic properties.

We look forward to continued consultation on this project. Please provide our office with copies of any consulting party comments on the effect report or the minutes from Meeting #3.

If you need further information on above ground resources please consult Barbara Frederick at 717.772.0921 or [bafrederic@pa.gov](mailto:bafrederic@pa.gov)

Sincerely,



Douglas C. McLearn, Chief  
Division of Environmental Review