

**Norfolk Southern Railway Company Pittsburgh Vertical Clearance Projects
W. North Avenue Bridge Historic Bridge Rehabilitation (HBRA) Report
Responses to Comments**

Comment #	Page #/Section/Paragraph*	Commenter	Comments	Responses
1	General	Cheryl Nagle PA SHPO	If the Vertical Clearance project was not a proposed project, would the W. North Avenue Bridge be a rehabilitation/replacement project by PennDOT? In other words, is the bridge's current posted 10 ton load and existing structural deficiencies only an issue due to the proposed Vertical Clearance project?	The bridge's posting and existing structural condition are issues that need to be addressed regardless of the proposed Pittsburgh Vertical Clearance Projects. If the Pittsburgh Vertical Clearance Projects were not projects as part of this proceeding, the City of Pittsburgh would be required to repair the bridge at its own expense and provide a clearance of not less than 22 feet above the tracks to meet safety criteria and as ordered by the Pennsylvania Utility Commission in 2006 and again in 2010.
2	General	Cheryl Nagle PA SHPO	Would the facility deficiencies be an issue if the railroad line was lowered, instead of the proposed increase for vertical clearance?	Yes, the bridge posting and existing structural condition are issues with or without the proposed Pittsburgh Vertical Clearance Projects. The W. North Avenue Bridge is unable to carry the full complement of highway loads that are legal in Pennsylvania.
3	General	Glenn Olcerst RP3	<p>The parties' March 19, 2018 Scoping Meeting Minutes indicate that PennDOT believed that raising the vertical profile of West North Avenue bridge would require ROW acquisition from adjacent historic resources. That work would trigger the need to conduct archaeological investigations.</p> <p>In response, those Minutes indicate that a Norfolk Southern Representative maintained that a traffic study was under review, and that the four lanes section of Brighton Road may be reduced to three lanes.</p> <p>As Rail Pollution Protection Pittsburgh (RP3) has maintained, it is now acknowledged that W. North Avenue is classified as a Neighborhood Collector and carries approximately 4,080 vehicles per day. Brighton Road is designated as a Community Collector and services approximately 10,480 vehicles per day. Truck traffic is 2 percent and 7 percent, respectively. Finally, that intersection has experienced ten reported crashes over the most recent five-year period.</p> <p>Given the volume of vehicle/truck traffic outlined above, it is clear that Brighton Rd will remain at 4 lanes. That means that ROW must be acquired, and temporary construction easements will be necessary. All of which necessitate following Archaeological Resources Methodology pursuant to the State History Code (Act 70, Title 37 PA Consolidated Statutes, and PennDOT Policy Procedures set forth in Publication 689: The Transportation Project Development Process Cultural Resources Handbook.)</p> <p>The archaeological area of potential effect is defined as "all areas of proposed subsurface disturbance by project activities including the legal/existing right of way, acquired right of way, permanent easement, and temporary construction easements."</p> <p>None of the required actions outlined above are, as yet, mentioned in, or encompassed by your Report.</p>	<p>On March 10, 2020, consulting parties were notified that the revised HBRA Report for the W. North Avenue Bridge had been posted on the Norfolk Southern Project website and was available for review and comment. RP3's comments do not address the content of that report and are focused on meetings and reports from 2018 and 2019. The purpose of the comment period was to obtain consulting party input on the bridge rehabilitation approaches that were presented as potential engineering solutions to avoid or minimize potential adverse effects to historic properties.</p> <p>While RP3's comments are misplaced in relation to this HBRA Report, the matters therein have been appropriately addressed during the course of the larger project review. Although not relating to this HBRA Report, we provide the following information as a review of data pertaining to archaeological investigations contained in earlier submissions, including the 2018 PA SHPO Project Review Form (Michael Baker International, Inc. 2018) and the 2019 Identification of Historic Properties Report (Michael Baker International, Inc. 2019), both of which are available on the Norfolk Southern Project website:</p> <p>PA SHPO Project Review Form (2018) Archaeological Resources Methodologies "Current project plans do not require the acquisition of additional right-of-way. Because all construction activities will take place within the existing right-of-way, it is not anticipated that archaeological investigations will be warranted. Should project plans change, the need for archaeological services will be reevaluated at that time."</p> <p>The archaeological potential was evaluated for each project location when determining the area of potential effects (APE) and incorporate possible staging areas that may be required. For the W. North Avenue Project, the APE included a possible staging area bounded by W. North Avenue, Brighton Road, and Rope Way. The assessment included a brief land-use history based on a literature</p>

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			<p>Moreover, the February 19, 2019 “Determination of Eligibility” email from District Environmental Manager Mark Young notes the following comment:</p> <p>“The project description calls this a vertical clearance project but makes no mention (or conclusions) that there will be track lowerings...There appears to be a foregone conclusion (no alternatives, no effort to identify ways to avoid or minimize a potential adverse effect) that these are the final project activities.”</p> <p>It appears to the undersigned, and to any objective reader, that the outcome of this project has been predetermined, and that Norfolk Southern is just going through the motions and checking boxes.</p>	<p>review and a review of historic maps and aerial photographs. At the time, it was anticipated that no subsurface disturbance would occur at this location and archaeological investigations would not be warranted.</p> <p>PA SHPO Letter of Concurrence on the PA SHPO Project Review Form and APEs In a letter dated June 5, 2018, the PA SHPO concurred with the APEs for the project locations and added the following regarding archaeological resources:</p> <p>“There is a high probability that archaeological resources are located in this project area. In our opinion, the activity described in your proposal should have no effect on such resources. Should the scope of the project be amended to include additional ground-disturbing activity, this office should be contacted immediately, and a Phase I Archaeological Survey may be necessary to locate all potentially significant archaeological resources.”</p> <p>Identification of Historic Properties Report (2019) The archaeological resources methodology included in this report was revised from that presented in the PA SHPO Project Review Form to incorporate the PA SHPO’s comment regarding archaeological potential and the possible need for future studies should the scope of the project change.</p> <p>At this point in the project timeline, we have prepared an HBRA Report to determine if the W. North Avenue Bridge can be rehabilitated to meet the project purpose and need and in a way that meets the Secretary of the Interior’s Standards for Rehabilitation (SOI Standards). The report, and the subject of this comment period, found that neither rehabilitation option met the SOI Standards. The Alternatives Analysis, currently underway, will evaluate alternatives for rehabilitation and replacement, depending on SHPO’s concurrence, and includes raising the bridge, lowering the tracks, and a combination of raising the bridge and lowering the tracks. The issue of track lowering has been part of the initial consideration of alternatives and was raised in public comment during the June 26, 2019 Public Open House meeting in which NSR and PennDOT solicited input from the public, governmental entities, elected officials, and others regarding issues for the Act 120 assessment.</p> <p>Should any alternative require additional right-of-way, the need for archaeological investigations will be assessed at that time in consultation with PennDOT and the PA SHPO as required by the Pennsylvania History Code.</p> <p>The referenced February 19, 2019, email relates to comments on the Identification of Historic Properties Report discussed above, which was developed to identify properties listed on or eligible for listing on the National Register of Historic Places (NHRP) within the APEs for one of the alternatives under Title 37 of the Pennsylvania Code, 37 Pa.C.S. § 101 et seq. (Pennsylvania History Code). In reviewing the draft report, the District Cultural Resources Professional (CRP) wanted to make sure that the project description ensured that consideration was</p>

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				<p>given to options that could avoid or minimize effects to cultural resources. The APEs contained in that the previous APE report assumed a bridge raising to achieve 22ft clearance at W. North Avenue and Pennsylvania Avenue in order to encompass the maximum required grade changes to local streets. The assessment of reasonable alternatives is identified in an Alternatives Analysis, which is under development and will be posted to the Norfolk Southern website for review with the draft Determination of Effects Report.</p> <p>Although this comment was submitted regarding the review of the HBRA Report in Consulting Party Meeting #2 as part of the Pennsylvania History Code compliance process for the W. North Avenue Bridge Project, the comment is being noted as part of the Section 2002 of Act 120 record and will be addressed in the appropriate manner.</p>
4	General	Glenn Olcerst RP3	To be clear, RP3 submits that the current and projected future accident rate and increases in the volume of traffic on the W North Ave Bridge should result in a finding that raising that bridge further is a safety hazard.	<p>Traffic Impacts</p> <p>Although this comment was submitted regarding the review of the HBRA Report in Consulting Party Meeting #2 as part of the Pennsylvania History Code compliance process for the W. North Avenue Bridge Project, the comment is being noted as part of the Section 2002 of Act 120 record and will be addressed in the appropriate manner.</p> <p>Research identified nine crashes within the five-year period from 2014 through 2018, inclusive. The number of crashes in any one year ranged from one to three crashes per year. The total number of crashes is low and does not meet traditional engineering thresholds for mitigation. The most typical crash type at signalized intersections is the rear-end crash. This signalized intersection at Brighton Road experienced one rear-end crash, five angle crashes, and three head-on crashes. Angle crashes are representative of a vehicle on one street or the other running a red light. The head-on crashes at intersections are indicative of poor intersection geometry that does not provide clear guidance to drivers.</p> <p>A modern intersection and traffic signal design, as incorporated into the Pittsburgh Vertical Clearance Projects, will improve safety and operations, not degrade them. Overall, a modern intersection and traffic signal design are expected to reduce the likelihood of crashes at the intersection. Proper signal head placement, clear and visible signing, backplates, left turn signal phasing, and properly aligned lanes should collectively contribute to reducing crashes. Furthermore, reduced crossing distances have a proven safety benefit for non-motorized users as lane reductions reduce crossing distance for pedestrians and bike riders.</p> <p>Norfolk Southern will address issues related to roadway design with the City of Pittsburgh as part of the street grade change approval process.</p>