



December 10, 2019

Timothy Zinn
Michael Baker International
100 Airside Drive, Airside Business Park
Moon Township PA 15108

ER 2018-1595-003-G: PennDOT Multimodal, Norfolk Southern Railway Company Pittsburgh vertical Clearance Projects, Swissvale and Pittsburgh, Allegheny County, Draft Historic Bridge Rehabilitation Analysis Reports

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.

Draft Historic Bridge Rehabilitation Analysis Reports (HBRA)

General Comments

- The consulting parties will be given 30 days to review submissions.
- Please do not submit multiple types of reports (eligibility, rehabilitation analysis, effects, etc.) as one submission for review. Please take into consideration the time and effort needed to review and comment on the various types of reports.
- The consulting parties were asked to review and comment on the Draft HBRA reports. The comments provided below are not to be construed as the PA SHPO's official comments on any finding, rather they are items that should be addressed in the revised report that the consulting parties will then have 30 days to review and comment on.
- All consulting party comments on the draft HBRA need to be provided with the revised report.

W. North Avenue Bridge

- Since the PA SHPO provided comments on the Determination of Eligibility (DOE) after the draft HBRA report was completed, has there been any additional historic resources that should now be included in the HBRA (see Figure 3 – Constraints; and E. Other Historic Properties in the Area of Potential Effects).
- Please include the comments from the other consulting parties regarding the DOEs.
- Please provide more information regarding the conclusion of the draft HBRA regarding:
 - Both Options A and B state that the loss of 85 percent of the historic material does not comply with the SOI Standards. However, the SOI Standards are very specific regarding replacement in-kind. In addition, the draft HBRA states that as a contributing bridge to a larger historic resource, while “retention of the overall appearance of the bridge, including material and physical features, contributes to the character of the district and should be considered...those portions of the bridge not visible from the street or public access are generally not called out as character defining features in a historic district.”

- If the two concrete-encased through girders are the most visible character defining feature, and they are repaired and rehabilitated (including reapplying concrete gunite finish in the same design/pattern), why would the rehabilitation not meet the Standards?
- If the floorbeams are to be considered secondary character-defining members, and the SOI allows for replacement in-kind, then why would the replacement of the floorbeams not meet the SOI Standards?
- The draft HBRA states that the bridge is currently posted for a 10-ton single vehicle and 19-ton combination vehicle weight restriction. The report only discusses the forecasted issues for the railroad (traffic demands, vertical clearance, etc.), what is the forecasted need for the vehicular traffic that crosses this bridge? Does the current and forecasted needs conclude that the current posting is adequate?
- The draft HBRA states that to rehabilitate the structure in Option A, the superstructure would require significant jacking and falsework to support the superstructure and floorbeam rehabilitation was examined but ultimately dismissed. Why would the floorbeam modification only be 25 years compared with 40-50 years? What else could be done to extend the bridge's service life?

Merchant Street Bridge

- Since the PA SHPO provided comments on the Determination of Eligibility (DOE) after the draft HBRA report was completed, has there been any additional historic resources that should now be included in the HBRA (see Figure 3 – Constraints; and E. Other Historic Properties in the Area of Potential Effects).
- Please include the comments from the other consulting parties regarding the DOEs.
- Please provide more information regarding the conclusion of the draft HBRA regarding:
 - The draft HBRA states that web strengthening plates would need to be placed over the existing web on the outside of the north girder and thus would create a visual adverse effect. Can the web strengthening plates be placed on the inside – track side - and still provide the needed repair, as this would meet the Standards?
 - Does a railroad bridge have load postings like roadway bridges - what is the current posting of this bridge and what is the anticipated increase needed for the proposed project? Can the structural capacity of this bridge type be increased?
 - As this is a contributing bridge to a larger historic resource, why would the replacement of rivets and additional need for bolts be an adverse effect?

If you need further information in this matter, please contact Cheryl L. Nagle at chnagle@pa.gov or (717) 772-4519.

Sincerely,



Douglas C. McLearn, Chief
Division of Environmental Review