

Consulting Parties Meeting # 1

Comments and Responses

Merchant Street Bridge Project

Prepared for:

Norfolk Southern Railway Company



Date: January 2020

**Norfolk Southern Railway Company
Merchant Street Bridge Project
CP Meeting 1
Responses to Comments**

Comment #	Page #/Section/Paragraph*	Commenter	Comments	Responses
1	General	Nagle PA SHPO	The consulting parties will be given 30 days to review submissions.	A 30-day review period is provided for in the project schedule for all official submissions in the Section 106 process (Identification of Historic Properties Report, Historic Bridge Rehabilitation Analysis Reports, Determination of Effects Reports, Memoranda of Agreement).
2	General	Nagle PA SHPO	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.	So noted.
3	General	Nagle SHPO	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.	So noted.
4	General	Nagle PA SHPO	All consulting party comments on the draft HBRA need to be provided with the revised report.	So noted.
5	General	Nagle PA SHPO	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).	There are no additional historic properties in the APE that were not included in the DOE report.
6	General	Nagle PA SHPO	Please include the comments from the other consulting parties regarding the DOEs.	No comments have been received from consulting parties on the DOE for this project as of 12/20/19.
7	HBRA Report/Page 11/V. Rehabilitation Evaluation/Paragraph 2	Nagle PA SHPO	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?	It is not practical to place the web strengthening on the inside (track side) as this is where the floor system connects to the web. Even if it could be placed on the inside, the required bolts would project through the existing web and be visible from the outside since the old and new have to be connected together. This information has been added to pages 8 and 11 of the HBRA.
8	HBRA Report/Pages 6 and 7/IV. Project Purpose and Need (Safety and Reliability)/ Paragraphs 1 and 2 and Facility Deficiencies/Paragraph 1	Nagle PA SHPO	Does a railroad bridge have load postings like roadway bridges - what is the current posting of this bridge and what is the anticipated increasement needed for the proposed project? Can the structural capacity of this bridge type be increased?	Railroads do load rate bridges and can put restrictions such as a "slow order," which will require the trains to go over the bridge at a slower speed than normal. They can also restrict the rail cars/axle configurations allowed on a bridge. If multiple tracks are on a bridge, they can also limit which tracks are allowed to be used by certain rail cars. The rehabilitation has a goal of increasing the capacity to carry current day rail live loadings. Trains currently go over the structure at a slower rate due to the curvature. In addition, the bridge steel trough that supports the load can physically be seen to move when a train passes which is a condition that needs to be corrected. Increasing the existing bridge capacity is not practical without taking the tracks out of service for an extended period of time.

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9	HBRA Report/Page 10/V. Rehabilitation Evaluation/Paragraph 2	Nagle PA SHPO	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?	A recurring PA SHPO comment on HBRA reports for other projects is that the replacement of a substantial number of rivets constitutes an adverse effect, specifically related to visual changes and the loss of integrity of design, materials, and workmanship. The installation of substantial numbers of new bolted connections in girder webs would irreversibly alter the design of the built-up members and reduce the overall integrity of the member's materials, design, and workmanship. The original rivet pattern in the built-up members would no longer be evident. Therefore, bridge plating would cause a substantial change to the historic appearance of the girders. By reducing the historic integrity of a contributing feature of the railroad, the integrity of a character-defining feature of the railroad corridor historic district is also reduced, which is the definition of an adverse effect.
10	HBRA – general	John DeSantis	SOI Standards allow for the replacement in-kind of deteriorated elements that are beyond repair. The bridge is a deteriorated element of the railroad corridor historic district. Can't the entire bridge be replaced in-kind with a replica bridge?	HBRA's do not normally consider bridge replicas because this type of action is bridge replacement, not rehabilitation. If the three built-up girders were replaced in-kind, this would result in a full superstructure replacement because the through floor system is also being replaced in full. Although the SOI standards recommend replacement in kind for components of a building or structure, they do not advocate constructing a replica when new construction (full replacement) is considered unless "a contemporary depiction is required to understand and interpret a property's historic value (including the re-creation of missing components in a historic district or site)" or "where no other property with the same associative value has survived." ¹ Further, Standard 9 of the SOI Standards for Rehabilitation states that in additions, exterior alterations, or related new construction "new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment." ²

¹ Secretary of the Interior's Standards for Reconstruction, <https://www.nps.gov/tps/standards/four-treatments/treatment-reconstruction.htm>.

² Secretary of the Interior's Standards for Rehabilitation, Standard 9, <https://www.nps.gov/tps/standards/rehabilitation/rehab/stand.htm>.