



# Pennsylvania State Historic Preservation Office

PENNSYLVANIA HISTORICAL AND MUSEUM COMMISSION

October 20, 2020

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

ER 2018-1595-003-N: PennDOT Multimodal, Norfolk Southern Railway Company, Merchant Street Bridge, Pittsburgh, Allegheny County, October 2020 Consulting Party Meeting and Comment and Response Document of September 2020

Dear Mr. Zinn

Thank you for submitting information concerning the above referenced project. The Pennsylvania State Historic Preservation Office (PA SHPO) is reviewing the project in accordance with state laws including 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). In addition, the project is being reviewed under the Memorandum of Understanding between PA SHPO and PennDOT which commits PennDOT to fulfill its obligations under the History Code using the federal review process outlined under Section 106 of the National Historic Preservation Act.

The intention of this letter is to clarify/respond to comments made at the October 6, 2020 consulting party meeting and the Comment and Response Document of September 2020.

### *Assessment of Effects*

Our initial comments on the Merchant Street Bridge project were based upon an understanding that this project was related to the purpose and need of the Pittsburgh Vertical Clearance Project. The sponsoring agency, PennDOT, who is responsible for compliance with the State History Code, has determined that the undertaking is limited to Merchant Street Bridge due to safety concerns related to the condition of the bridge.

In response to a request made by our office in September of 2020, PennDOT has indicated it is not possible to provide information for a structural condition comparison to other bridges along the line due to security and safety considerations of the Fixing America's Surface Transportation (FAST) Act.

We recognize the statement in our September 2020 letter indicating the Pittsburgh Vertical Clearance Project does not have the potential to have audible or atmospheric effects on the Allegheny Commons Historic District has caused confusion. As indicated at the October meeting, this statement was based on limited information and we rescind that opinion for the Merchant Street Bridge project.

When consultation for the Pittsburgh Vertical Clearance project is initiated, we request a detailed assessment of the potential for indirect effects, audible, atmospheric, and visual, be provided. This assessment should address indirect effect considerations mentioned during the October Merchant Street Bridge meeting including train idling, frequency of traffic, and required number of locomotives. We may also, depending upon documentation provided when consultation is initiated, request additional information.

### *Mitigation*

Replacement of the Merchant Street Bridge will cause an adverse effect to the National Register of Historic Places-eligible *Pennsylvania Railroad: Main Line*. A Memorandum of Agreement (MOA) will be developed to resolve the adverse effect.

We offer the following comments on mitigation measures to be outlined in the upcoming draft MOA.

Interpretive signage should be consistent with the size and appearance of other signage in the vicinity. The signage should enhance, not replicate, the content and themes of signage in the area. If any local interests have a role to play in the design, construction, or maintenance of the interpretive signage, those organizations should be included as a signatory to the agreement. Ideally, the signage will be constructed in proximity to the existing bridge.

As the PA SHPO suggested at the October consulting parties meeting, an inventory of all features that contribute to the historic Pennsylvania Railroad Mainline between Harrisburg and Pittsburgh (bridges, stations, tunnels, etc.) is appropriate mitigation for this project. This effort would include photographic documentation and completion of basic information for inclusion of each resource in the PA SHPO online database of previously recorded resources.

Finally, minimization efforts, including the design of the new superstructure and rehabilitation of the decorative wrought-iron fencing and stone retaining walls, should be memorialized in the agreement. The agreement should also address a commitment to the treatment of the wall and fencing along South Commons Avenue, as it was stated at the meeting that this work may be delayed until the design of the vertical clearance project.

As discussed at the October consulting parties meeting, a draft of the MOA will be provided to consulting parties and our office for review, comment, and revision before distribution for signature.

For questions concerning this review and/or for future consultation, please contact Barbara Frederick at (717) 772-0921 or [bafrederic@pa.gov](mailto:bafrederic@pa.gov).

Sincerely,



Douglas C. McLearn, Chief  
Division of Environmental Review