



September 16, 2020

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

ER 2018-1595-003-M: PennDOT Multimodal, Norfolk Southern Railway Company, Merchant Street Bridge, Pittsburgh, Allegheny County, Determination of Effect Report and Response to Comments from Consulting Party Meeting #2

Dear Mr. Zinn:

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 received the draft meeting notes from the April 20, 2020 consulting party meeting (meeting # 2) which included a presentation and discussion of the assessment of effect and mitigation for the Market Street Bridge. The consulting parties provided comments and a response to comments was received on July 8, 2020. Additional comments from consulting parties were received on September 8, 2020. We offer the following comments on the Determination of Effect Report, subsequent to our comments of April 30, 2020, and the Response to Comments from Consulting Party Meeting #2.

#### **Above Ground Resources**

The Response to Comments document indicates the Merchant Street Bridge Project is independent of the West North Avenue Bridge Project and its design will not be affected by any of the other proposed projects on the Pittsburgh Vertical Clearance Project. The condition, age, and long-term maintenance are reasons given for advancing the Merchant Street Bridge separately and before the other bridges on the Pittsburgh Vertical Clearance Project corridor.

With regards to condition, the PA SHPO is requesting a written response to concerns raised in the September 8, 2020 email from RP3 which questions the condition of other bridges along the line in comparison to Merchant Street. The response should provide an understanding of the condition of other structures along the line and why it is necessary to replace the Merchant Street Bridge before and independent of others along the Pittsburgh Vertical Clearance Project corridor. This information can be provided at the upcoming consulting party meeting scheduled for October 6, 2020.

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

As historic properties are located within the APE for the project, it is necessary to assess the effects of the project on these resources and work to avoid, minimize, and/or mitigate adverse effects. The PA SHPO provides the following comments with regards to the assessment of effects outlined in the Determination of Effect Report.

##### *Allegheny Commons Historic District*

The Allegheny Commons Historic District (Key No. 086811) is a city park that was listed in the National Register in the areas of Community Planning and Development and Landscape Architecture. The bridge does not contribute to the park historic district. Contributing resources to the park within the APE include the stone retaining walls along the railroad bed topped with wrought iron fencing. These walls separate Merchant Street from the park in the proximity of the railroad bridge. Neither of these features will be impacted in a way that changes the character of the district as project plans for the bridge replacement will outline their retention and rehabilitation in accordance with the Secretary of the Interior's Standards for Rehabilitation (the Standards).

The proposed new superstructure for the Merchant Street Bridge will be a similar height and appearance as the existing bridge. The PA SHPO agrees there is no potential for a visual effect to the Allegheny Commons Historic District associated with the superstructure replacement and rehabilitation of the adjacent stone wall and fencing.

It is the opinion of the PA SHPO office that the potential for indirect visual effects on the Allegheny Commons Historic District associated with the double-stack project should be addressed as part of the Merchant Street Bridge project. Comments provided during the second consulting party meeting for Merchant Street Bridge indicate local residential property owners and occupants are interested in possible visual screening from the increased height of freight traffic at this location. Significant increases to the height of the historic walls to screen double-stack freight could result in the need for a change to the design of the Merchant Street Bridge. The addition of higher walls or landscaping between the park and the railroad could also adversely affect the Allegheny Commons Historic District through physical destruction or damage, changes to historic character, and introduction of new features within the district.

With regards to audible and atmospheric indirect effects, the response comments document indicates if the Pittsburgh Vertical Clearance Project is constructed, the number of trains traveling through the APE will decrease as the double-stack trains will allow for higher volumes of freight and fewer trains. Overall, the project will result in a decrease in emissions and noise in comparison to the No Build alternative.

If the Merchant Street Bridge project is not redesigned to accommodate visual screening (higher walls or landscaping), the PA SHPO agrees that the project will have No Adverse Effect on the Allegheny Commons Historic District.

#### *Merchant Street Bridge*

The Merchant Street Bridge, constructed ca. 1905, is a contributing element to the Pennsylvania Railroad: Main Line (Pittsburgh to Ohio State Line Railroad Corridor Historic District, Key No. 112372). The bridge was constructed as part of an early twentieth-century grade separation project that depressed the railroad line through much of Pittsburgh. The line is eligible in the areas of transportation and engineering. The bridge is deteriorated and can no longer carry rail traffic over a City street in a safe manner. The rehabilitation report concluded the bridge could not be rehabilitated to meet project purpose and need while conforming with the Standards. The proposed project will result in physical destruction of the bridge superstructure and changes in character within the railroad historic district. Therefore, the PA SHPO agrees with the agency finding of Historic Properties Adversely Affected.

To minimize the adverse effect to the railroad historic district, the stone substructure of the bridge will be retained and rehabilitated in accordance with the Standards. The new superstructure will be similar in size and scale to the existing structure. Other contributing features dating to the early-twentieth-century grade separation project include the decorative wrought-iron fencing and the stone retaining walls separating the park from the underpass and the railroad corridor. These will also be retained and rehabilitated according to the Standards to minimize the adverse effect.

As currently designed, the Merchant Street Bridge project would adversely affect the Pennsylvania Railroad: Main Line (Pittsburgh to Ohio State Line) Railroad Corridor Historic District. Additional consultation with the PA SHPO and consulting parties is needed to develop mitigation measures. The mitigation should be relevant to the railroad, have a public benefit, meet the needs of all parties to the consultation, and be commensurate with the project effects.

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