



Pennsylvania State Historic Preservation Office

PENNSYLVANIA HISTORICAL AND MUSEUM COMMISSION

December 13, 2022

Tim Zinn
Michael Baker International, Inc.
100 Airside Drive
Moon Township, PA 151080000

RE: ER Project # 2018PR13984.021, NORFOLK SOUTHERN PITTSBURGH VERTICAL CLEARANCE,
Department of Transportation (PennDOT), Pittsburgh City, Allegheny County

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.

Project Description

The project addresses five obstructions limiting vertical clearance of double-stack rail traffic. The purpose of the Pittsburgh Vertical Clearance Projects is to enhance the existing rail infrastructure on the main line through Pittsburgh and in southwest Pennsylvania in order to provide more efficient movement of freight from New York/New Jersey to Chicago and specifically through Pennsylvania.

Overall Project Comments

We require more information to complete our review of the Determination of Effects Report. We may have additional questions following the December 14, 2022 consulting party meeting. The comments of PA SHPO should be considered alongside those raised by other consulting parties for the project. Please forward other consulting party comments on the report as they are received for our consideration. Please submit the comments and revised report in response to the More Information Request via PA-SHARE.

Review Period

According to the PennDOT Cultural Resources Handbook (Publication No. 689), the consulting parties have 30 days to comment on a PennDOT/FHWA finding that a project has an effect on historic properties. The over 400-page report with appendices was provided to the consulting parties via email on December 1, 2022, two weeks before the consulting party meeting, scheduled for December 14th. The consulting parties should be given until December 30, 2022 to provide comments on the Determination of Effect Report. An additional 30-day review period should be allowed for any new information provided at the December 14th consulting party meeting or in response to comments made on the Determination of Effect Report.

Public Involvement and Consulting Party Coordination

As part of this additional information request, please provide an explanation as to why there has been no consultation on this vertical clearance project since 2020.

Purpose and Need

The purpose of the review process is to ensure consideration of historic properties alongside the purpose and need of the project. The Purpose and Need statement on pages 5-9 addresses the needs of the overall project but does not address the specific needs at the five obstruction locations beyond noting height restrictions or condition of existing overhead bridges. For several of the project locations, more information is needed on site specific requirements. For example, for the West North Avenue Bridge, the pedestrian use requirements for sidewalk height, grades, and ADA accessibility are not stated. Please include more detailed information on the specific requirements of each location either here or in the relevant sections of the report.

Consideration of Alternatives

36 CFR 800.6 requires the development and evaluation of alternatives or modifications to the undertaking that could avoid, minimize, or mitigate adverse effects. For each location, the report lists the names of the alternatives and describes and assess the effects of the preferred alternative. There are references to Alternatives Analysis Reports for each of the five obstruction locations in the report: Washington Avenue Bridge (page 19), the Amtrak Station Project (page 43), West North Avenue (page 84), Pennsylvania Avenue (page 133), and Columbus Avenue (page 154). We request a copy of the alternatives analysis reports for each of the five locations in order to document alternatives that were considered to avoid or minimize adverse effects to historic properties.

Project Specific Comments

Washington Avenue Bridge Project

This project involves lowering track beneath the bridge that carries Washington Avenue over the Pennsylvania Railroad: Main Line (Harrisburg and Pittsburgh) Railroad Corridor Historic District (Pennsylvania Railroad: Main Line) and repairing spalls and repointing the substructure of the contributing bridge. Will there be protection for the adjacent stone retaining wall and decorative wrought iron fencing, also contributing resources to the Pennsylvania Railroad: Main Line during construction? Will there be a commitment to restore portions of the wall or fencing in accordance with the Secretary of the Interior's Standards that might be affected during exposure or construction?

Amtrak Station Project

The project involves alterations to the roof girders and exhaust chutes over track 1 and 2 of the 1958 train shed. The train shed is a contributing resource to both the Pennsylvania Railroad Station and the Pennsylvania Railroad: Main Line. Please provide photographs and more detailed plans of the two locations on both tracks where foundations and new columns will be installed.

W. North Avenue Bridge Project

The project involves the demolition, replacement, and raising of the bridge that carries W. North Avenue over the railroad, and alterations/removal of other contributing elements to the Pennsylvania Railroad: Main Line. In addition, it will be necessary to make changes to the adjacent areas to meet the required vertical clearance. These proposed changes include increasing the vertical grade of the bridge approaches and sidewalks, sidewalk replacement, driveway adjustments, retaining wall and toe wall construction along several of the adjacent properties, and permanent property acquisition to allow for embankment slopes at all four quadrants of the crossing.

Contributing features to the Pennsylvania Railroad: Main Line adjacent to this location include concrete retaining walls with stone coping, decorative wrought iron fencing, railroad safety fencing and an elevated out-of-service railroad siding that served the former International Harvester Building. Will there be protection for the adjacent concrete retaining wall with stone coping and

fencing during construction? Will there be a commitment to reconstruct/restore portions of the wall or fencing in accordance with the Secretary of the Interior's Standards? How will the substructure for the new bridge tie into the historic wall and fencing? Please also provide more information on how the siding of the former International Harvester Building will be affected by the project.

Please discuss pedestrian needs at this location and alternatives considered to avoid alterations to the façade of the International Harvester Building and the introduction of new visual elements along W. North Avenue in the immediate setting of the International Harvester Building and the Allegheny Second Ward Industrial District. Please also note that some previous infill of the windows and changes to the water table of the International Harvester Building were carried out during the period of significance for the resource (1902-1933).

The report notes the decorative wrought iron fencing lining the railroad corridor is a contributing feature to the Allegheny Commons Historic District. However, there is no discussion of other adjacent landscaping in the park, such as the maple trees along Brighton Road and the ginko trees flanking the railroad tracks, which are contributing features. In addition, the low brick retaining wall along W. North Avenue dates to the Simonds & Simonds park-wide redesign scheme of the mid 1960s and is a contributing feature. Please provide more detailed plans on potential project effects and proposed treatment of the wrought iron fencing, landscaping, low brick retaining wall and any other contributing landscape features of the historic district. Please provide more information on the permanent (.09 acres) property take and temporary construction easement (.04 acres) in the park. What is the current appearance and use of this land in this area and how will it be affected by the project?

It would be helpful to understand why the alternative that involved the replacement of the bridge and lowering of the railroad tracks to achieve 22' vertical clearance alternative was dismissed, as it would appear this alternative would have minimized impacts to adjacent historic properties.

The preferred alternative indicates the replacement bridge would be a single-span prestressed concrete spread box beam bridge. Why was this bridge type selected? Will the new bridge be designed to be compatible with other bridges along the railroad corridor?

Pennsylvania Avenue Bridge Project

This project involves replacement of the through-girder bridge that carries Pennsylvania Avenue over the Pennsylvania Railroad: Main Line. A steel pony truss similar in scale and configuration to the original ca. 1905 pony truss bridge is proposed at this location. Contributing features to the railroad adjacent to this location include concrete retaining walls with stone coping, decorative wrought iron fencing and railroad safety railing. Will there be protection for the adjacent stone retaining wall and fencing during construction? Will there be a commitment to restore portions of the wall or fencing in accordance with the Secretary of the Interior's Standards that might be affected during construction?

The project will also require approach work along Pennsylvania Avenue to accommodate the increased height of the bridge. This includes raising the height of the sidewalk by 11" and obscuring the façade of 901 Pennsylvania Avenue, a contributing resource to the Allegheny Second Ward Historic District. Please provide more information on the pedestrian access requirements at this location and efforts made to minimize the introduction of new features into the district.

Columbus Avenue Bridge Project

The project involves lowering the track under the non-contributing bridge that carries Columbus Avenue over the Pennsylvania Avenue: Main Line and track reconfiguration. Minor repairs to the

bridge substructure are also planned. No work is proposed along Columbus Avenue or California Avenue. The concrete retaining walls with cut stone coping along the corridor and decorative iron fencing along Allegheny Avenue and Columbus Avenue approach ramp are contributing features. Will there be protection for the adjacent concrete retaining wall and fencing during construction? Will there be a commitment to restore portions of the wall or fencing in accordance with the Secretary of the Interior's Standards that might be exposed or affected during construction?

Minimization and Mitigation

We have not commented on the potential for effects in our review of the Determination of Effects Report as we require more information to complete our review. However, we would like to provide some guidance on efforts to minimize or mitigate for adverse effects in advance of the upcoming consulting party meeting as a preliminary discussion of mitigation measures is included in the agenda. The purpose of minimization is to lessen the potential effects of a project on historic properties. Minimization measures can include protection of historic features during construction; repair or replacement of affected features in kind; and the development of landscaping and lighting plans, etc. Minimization measures can be commemorated in project agreements but should not be misconstrued as mitigation.

Mitigation is used to resolve adverse effects and can include any actions that help to offset or compensate for a project's negative impacts to a historic property. The PA SHPO maintains Criteria for Meaningful Mitigation: <https://www.phmc.pa.gov/Preservation/About/Documents/Criteria%20for%20Determining%20Meaningful%20Mitigation.pdf> for use in the development of mitigation ideas. These criteria are to serve as a framework for the development of meaningful mitigation and/or as a tool for assessing the effectiveness of mitigation ideas. The mitigation for adverse effects will be identified in consultation with the PA SHPO and the consulting parties.

We look forward to further discussions at the consulting party meeting on December 14, 2022

For questions concerning this review, please contact Barbara Frederick at bafrederic@pa.gov.

Sincerely,



Emma Diehl

Environmental Review Division Manager