



January 11, 2023

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

RE: Norfolk Southern Pittsburgh Vertical Clearance Project (the Railroad Project), Determination of Effects Report (December 2022; Effects Report) prepared for Norfolk Southern Railway Company, by Michael Baker International, Inc

Mr. Zinn:

Q Development has extensive experience in historic tax credit developments, completing more than \$100 million in project activity in the last decade, nearly all of which utilized the federal and Pennsylvania historic tax credit programs and meeting all applicable United States Secretary of the Interior's (SOI) Standards for the award of historic tax credits. With this experience in mind, Q Development is opposed to the so-called Preferred Alternative contained in the Effects Report and offers alternatives for consideration. If implemented as proposed, the Preferred Alternative will cause a substantial Adverse Effect to the National Register of Historic Places (NRHP) – listed property at 810 W. North Avenue. As proposed, the Preferred Alternative will violate the SOI Standards jeopardizing \$2.5 million in approved Rehabilitation Investment Tax Credits (RITC) (aka Historic Tax Credits or HTC) already allocated to the \$15 million on-going and under construction rehabilitation of the Allegheny Branch House Lofts building.

810 W. North Avenue

In 2020, Q Development sought and successfully secured an individual listing in the National Register of the former International Harvester building (now known as Allegheny Branch House Lofts) before beginning the redevelopment work. This effort was undertaken in particular to avail the project of historic tax credits.

The building has been listed on the register under Criteria A, B, and C. Of particular note is Criteria C: Properties “that embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction.”

Further, besides the individual listing in the NRHP, the building at 810 W. North Avenue serves as the apex of *five* separate and distinct historic districts:

- Pennsylvania Railroad: Main Line (Pittsburgh to Ohio State Line) Railroad Corridor Historic District
- Allegheny West Historic District
- Mexican War Streets Historic District
- Allegheny Commons Historic District
- Allegheny Second Ward Industrial Historic District (eligible)

While the location is significant to each district, standards for evaluation and criteria for Adverse Effects are higher (and ought to be) for individually listed properties than multi-asset resources, thus making the proposed modifications that much more impactful to both the building and each district.

As noted in the Effects Report, the proposed Preferred Alternative will affect this historic property by requiring alterations to the building's front façade, including the construction of window wells or the shortening of three first-floor display windows, and the potential raising of the limestone water table (building base) and windowsills. This approach does not satisfy the SOI Standards, as the windows are Character Defining Features



of the building. To secure the Part 2 approval, the National Park Service (NPS) staff noted multiple considerations related to the windows and window openings of the building, requiring Q Development to maintain the full-size openings and design thereof.

Historically, the display window openings on the first floor of the building were used to display the entire product line of International Harvester and to encourage foot traffic into the Branch House and were integral in the marketing efforts of IH at the time. The approved rehabilitation plans call for restoring these openings fully with glazing to increase the transparency between the street and the future public building lobby.

Based upon the NPS engagement on this project, it is self-evident that any modification of these window openings or reduction in size thereof will not satisfy the SOI Standards. Thus, the Preferred Alternative jeopardizes the viability of an on-going \$15 million project and the approved \$2.5 million in HTC that provides a significant portion of the capital stack for the development.

Determination of Effects Report (December 2022) Response

The balance of this letter will respond to pages 114 – 116 of the Report, including Tables 5-11 and 5-12 regarding the Criteria of Adverse Effect and the Findings. A copy of those pages and Tables are enclosed with this letter, but a few citations are worth highlighting:

Application of the Criteria of Adverse Effect for the International Harvester Building (page 114):

The Preferred Alternative would require a vertical alignment adjustment in the 800 block of W. North Avenue that would increase the profile grade [of the roadway] to a maximum of 8.0%. Sidewalk grades would follow the roadway profile except for the sidewalk segment fronting the International Harvester Building, which would have a sidewalk length of 90' consisting of 30' ramp runs of 8.3% with two 5' level landings. The ramp runs would be separated from the roadway with a proposed landscape area in order to maintain access to the building's existing main entrance. While the doorway would not require alteration, three partially infilled first-floor display windows east of the doorway would need to be protected by window wells or shortened by raising the limestone water table and sills to accommodate the increased vertical alignment of the sidewalk. The windows were shortened, and the limestone water table was raised when the vertical alignment of W. North Avenue raised ca. 1929 and again in the 1940s, resulting in the stepped water table seen on the building today. Both window treatment alternatives will be explored with the property owner prior to final design. Concrete stairs would be constructed to access the existing walkway along the building's northeast façade, and a 27' retaining wall with a protective fence would be constructed along W. North Avenue between the stairs and the new bridge.

Table 5-12 Application of the Criteria of Adverse Effect for the International Harvester Building

➤ Summary Header Box:

Criteria of Adverse Effect: An adverse effect is found when an undertaking may alter, directly or indirectly, any characteristics of a historic property that qualify the property for inclusion in the NRHP in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. Consideration shall be given to all qualifying characteristics of a historic property, including those that may have been identified subsequent to the original evaluation of the property's eligibility for the NRHP. Adverse effects may include reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance or be cumulative.

Response:

- ❖ The Preferred Alternative proposes to “alter directly” the Character Defining Features of the display window openings along the primary façade of W. North Avenue.
- ❖ The work would “diminish the integrity of the property's location, design, setting materials, workmanship, feeling, or association” substantially.



- ❖ These changes are an Adverse Effect to the NRHP-listed property.

While the impacts to the windows and the reduction in window openings are most significant, these changes are more than just the diminishment of the display window openings themselves but will also affect the limestone water table (base) of the building. As noted in the Identification of Historic Properties Report (September 2019) prepared for Norfolk Southern Railway Company, by Michael Baker International, Inc, the Pennsylvania Historic Resource Survey for the building highlights the architectural stature of the first floor: “The *limestone cladding visually forms a base on which the building rests*; comprised of a plinth course, scotia with fillet, and a beveled dado” (emphasis added). This is not by accident.

William D. Price [architect of the 1912-13 enlargement of the building] emphasized a uniform look for International Harvester buildings to make them immediately recognizable: “Through an express wish of the management, these buildings have been made as nearly alike in appearance and design as the varying conditions of size, location, and surroundings would permit; the idea being that whether north, south, east, or west, their appearance would stamp them at once as ‘International... We have tried to make the buildings strong in appearance as well as in construction, and the exteriors, while plain and moderate as far as expense is concerned, have a substantial look which goes to prove that they are there to stay.’ ” (International Harvester Company of America: Pittsburgh Branch House, National Register Nomination page 61)

The Preferred Alternative approach to both the display window openings, limestone water table and the fronting sidewalk, ramps and retaining walls diminishes this intentional design, setting, feeling and association both directly and indirectly.

Table 5-12 Examples of Adverse Effects:

- (i) Physical destruction of or damage to all or part of the property;

Evaluation:

Preferred Alternative would require the construction of window wells or shortening of three infilled first-floor display windows, which have been modified in the past, alternatives have been developed that would minimize damage to the historic property.

Response:

- ❖ Requiring any modification to the window wells or shortening of first floor display window openings is a clear admission that the Preferred Alternative diminishes the integrity, design, materials, feeling and association of the historic property.

Table 5-12 Examples of Adverse Effects:

- (ii) Alteration of a property, including restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation and provision of handicapped access, that is not consistent with the Secretary’s Standards for the Treatment of Historic Properties (36 CFR§68) and applicable guidelines;

Evaluation:

The Preferred Alternative would raise the street and sidewalk along the International Harvester Building for a distance of approximately 90’ consisting of 30’ ramp runs of 8.3% with two 5’ level landings. The ramp runs would be separated from the roadway with a proposed landscape area in order to maintain ADA-compliant access at the building’s existing entrance. No physical changes on the interior are required. Required exterior changes to the three display windows noted above will be executed in accordance with the SOI Standards.

Response:

- ❖ The proposed 90' of ramps in three 30' sections at 8.3% grade plus two 5' landings is 100' in length. Further, a code required 1' handrail extension would also be required at each end, raising the total length needed to 102'.
 - ❖ The attached measured drawings demonstrate that the distance for 102' of ramp and handrail is proposed for an area only 95' in length. The Preferred Alternative does not fit. (Diagram 1: Allegheny Branch House Lofts site plan)
 - ❖ Even if the ramping could fit, the code-required handrail extension areas will interfere with operation of the existing front door.
- ❖ Building code require ramps at 8.3% grade to feature handrails on both sides. Incorporating these handrails and their impact on narrowing of the sidewalk has not been accounted for in the Preferred Alternative.
 - ❖ Further, the proposed sidewalk ramping and elevation do not comport with the City of Pittsburgh standards for required tree pits and landscaping. Accounting for 36" deep tree wells plus the handrails will substantially narrow the sidewalks from nearly 10' to barely 5' in width.
- ❖ The statement that no physical changes on the interior is incorrect. Modifying the window openings and shortening them has an interior impact on the Character Defining Features of the windows. Compounding this negative impact, this location is the front lobby of the building, designed as a public gathering place and clubroom, affecting a greater number of visitors and individuals than in other areas of the building.
- ❖ The Preferred Alternative does not comport with SOI Standards and will jeopardize \$2.5 million in historic tax credits approved for the project.

Table 5-12 Examples of Adverse Effects:

(iv) Change of the character of the property's use or of physical features within the property's setting that contribute to its historic significance;

Evaluation:

The Preferred Alternative would not change the historic property's use. The project would not affect features that contribute to the property's significance; the W. North Avenue Bridge and the existing modern streetscape elements do not contribute to the property's setting.

In addition, the narrative on page 114 states "Concrete stairs would be constructed to access the existing walkway along the building's northeast façade, and a 27' retaining wall with a protective fence would be constructed along W. North Avenue between the stairs and the new bridge."

Response:

- ❖ While the Preferred Alternative will not change the historic use of the property, the use is changing as part of the ongoing SOI Standards-approved Allegheny Branch House Lofts redevelopment. The redevelopment of this and other nearby properties was called for in the 2007 Allegheny West Loft District Master Plan (Map 1, attached) as part of a revitalized residential district.
- ❖ The building is individually listed, in part, for its architectural design and architectural integrity. The overall rise in the sidewalk from the front door to the newly elevated bridge would total 6' (from 764' at the door to 770' at the bridge), but notably, only on one half of the front façade.
 - ❖ This unbalanced elevation negatively counters the architectural intent of International Harvester and its architect, William D. Price who designed and installed a balanced, solid base of Classical Revival style.
 - ❖ The Preferred Alternative is a physical and visual intrusion to the substantial and continuous stone base upon which the building rests.
- ❖ The Preferred Alternative does not accommodate the required dimensions for tree plantings under city code and therefore contributes to significantly narrowing the sidewalk.



- ❖ The 27' retaining wall will impede access to the front lobby access along the east façade of the building. The proposed access stairs do not synchronize with the ramp elevations and access points to this area.
 - ❖ Further, it is also appropriate to note this is not “an existing walkway” but a remnant of the historic loading dock installed by International Harvester.
 - ❖ The Pennsylvania State Historic Preservation Office (SHPO) noted that this loading dock remains a Character Defining Feature of the building, and required modifications to the rehabilitation plans to reflect its importance as part of the Part 2 approval of historic tax credits.

Table 5-12 Examples of Adverse Effects:

(v) Introduction of visual, atmospheric, or audible elements that diminish the integrity of the property's significant historic features;

Evaluation:

The Preferred Alternative would not introduce atmospheric or audible elements that diminish the integrity of the historic property's character-defining features. The visual effects of the project on the historic property will be minor. The new W. North Avenue Bridge, the raising of the street and sidewalk grade, the bifurcation of a modern sidewalk, and the alteration of recent landscape elements would not result in a substantial visual change within the viewshed of the historic property.

Response:

- ❖ As noted and documented above, the Preferred Alternative will introduce visual features that will diminish the historic features of the building, including:
 - ❖ the elevated sidewalk;
 - ❖ the required ramps and railings;
 - ❖ the retaining walls;
 - ❖ the reduction in size of the existing display window openings;
 - ❖ and restructuring the previously balanced water table elements.
- ❖ Audible impacts to the historic property include the 65% increase in rail traffic (Pittsburgh Vertical Clearance Project Open House, Frequently Asked Questions, Tuesday, June 26, 2018).
- ❖ Without the redesign of the bridge, the rail traffic quantity, length of trains, or audible impacts would be de minimis.
- ❖ These audible impacts are counter to the 2007 Loft District Master Plan, which predates the Vertical Clearance Project by a decade and a half.

Table 5-12 Examples of Adverse Effects:

FINDING: The W. North Avenue Bridge Project results in a finding of No Historic Properties Adversely Affected for the International Harvester Building under the Preferred Alternative. (Note: a similar Finding was in Table 5-10 regarding the Allegheny Second Ward Industrial Historic District, of which the International Harvester building is a contributing asset. This rebuttal applies to both Findings.)

Response:

- ❖ As evidenced by the responses above to Sections i, ii, iv, and v, this finding is incorrect.
- ❖ The NRHP-listed International Harvester property is subject to significant Adverse Effects under the Preferred Alternative.
- ❖ The Pennsylvania State Historic Preservation Office conveyed several similar concerns in their December 13, 2022 letter (attached). Notably:
 - ❖ that pedestrian needs at this location and alternatives [be] considered to avoid alterations to the façade of the International Harvester Building;



- ❖ that introduction of new visual elements along W. North Avenue in the immediate setting of the International Harvester Building [are a concern];
- ❖ that 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 SHPO letter further noted that “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 jeopardizes \$2.5 million in federal Rehabilitation Investment Tax Credits as approved in the August 9, 2022 Part 2 approval.

Minimization and Mitigation

Vertical Clearance Alternatives

The December 2022 Norfolk Southern Pittsburgh Vertical Clearance Projects Alternatives Analysis Report provides multiple options that would not have an Adverse Effect on the NRHP-listed International Harvester building. Alternative 3—Replace bridge and lower railroad tracks to achieve 22’ vertical clearance is clearly the least impactful to the property and its historic features. Alternative 4—Combination replace and raise bridge and lower railroad tracks to achieve 22’ vertical clearance also minimizes the Adverse Effects to the building and site. Both Alternatives should be more closely evaluated and reconsidered.

Most importantly, the Design Modification of replacing the bridge to a 21’ 4” vertical clearance is a start, but remains insufficient. The W. North bridge elevation is not the limiting factor for rail service along this line. Other work within the Pittsburgh Vertical Clearance Project is *more* limiting to rail traffic. Of the five project activities, the proposed vertical clearance modifications will cause the *second highest clearance* at W. North Avenue, indicating that the overall elevation of the bridge work can be reduced several more inches, mitigating the impact on the Allegheny Branch House Lofts. The Determination of Effects Report states that double-stack rail cars are 20’ 3” in height, and therefore 21’ still provides an extra 9” of clearance for these vehicles.

The clearances planned for the project are:

- Washington Avenue: 21’ 9”
- **Amtrak Station: 21’ 0” (emphasis added)**
- W. North Avenue: 21’ 4”
- **Pennsylvania Avenue: 21’ 2” (emphasis added)**
- **Columbus Avenue (Option 3A): 21’ 1” (emphasis added)**

For each inch of elevation, the resulting grade change can be reduced by one foot in length and impact. So selecting a clearance of 21’ 4” rather than 21’ 0” unnecessarily results in additional impacts to the roadway, the sidewalk, retaining walls, and most importantly to the Adverse Effects upon the historic property. Further, Alternative 4 considers lowering the tracks by six inches. Combined, lowering the track and reducing the clearance height to 21’ 0” could have a dramatic diminution to the Adverse Effects of the proposed work, as the overall grade change to the sidewalk and W. North Avenue could be reduced by nearly a foot, from 2’ 6” to only 1’ 8”.

Acoustic Impacts

To minimize the Adverse Effect acoustic impacts to the NRHP-listed International Harvester building, it is suggested that a 48” vertical retaining wall be constructed adjacent to the existing railroad corridor bridge. The installation of this wall will deflect much (though not all) of the additional noise around the building from the louder, longer and increased rail traffic. See attached Diagram 2 for the proposed location of acoustic barrier.

Secondarily, we suggest installing 67 acoustic windows (of 159 windows total) on the east façade of the building could counter the increased acoustic impacts to the property. This approach works to mitigate the acoustic impacts after they come into contact with the building (rather than deflecting around it as above).



Sidewalk Design Alternatives

The June 26, 2018 Open House presented alternative considerations to the Preferred Alternative regarding sidewalk and roadway configurations. These sidewalk configurations have the greatest minimization of Adverse Effects to the International Harvester building and are easily resolved. “Alternate 2A Switchback Ramp” is the most successful in resolving many of the Adverse Effects (Map 2, attached).

The Q Development team has reviewed Alternate 2A and has proposed modifications to further minimize the potential Adverse Effects (Rendering 1 and Diagram 3 attached). These refinements accomplish:

- ❖ Minimize grade changes along the sidewalk separate from the roadway
 - ❖ Separating the sidewalk and the roadway remains consistent with Alternate 2A and the Preferred Alternative;
- ❖ Provide ADA accessibility via the switchback ramp with slope reduced from three 8.3% sections to one 8.1% and one 7.7% sections;
- ❖ The switchback ramp allows the balance of the sidewalk plan to fit within the 95’ sidewalk distance to the front door, contrary to the Preferred Alternative;
- ❖ Extensive railings on both sides of the sidewalk are unnecessary, and don’t reduce the sidewalk width or have a negative visual impact to the historic property;
- ❖ Access to the historic loading dock/front lobby entry is preserved in an acceptable manner;
- ❖ No further adjustment to the water table is required;
- ❖ No reduction in window opening size is required, preserving both the exterior and interior experience of the historic display window openings;
- ❖ Most important, this approach likely preserves the viability of the \$2.5 million in Rehabilitation Investment Tax Credits approved by the National Park Service on August 9, 2022.

I look forward to further engagement as a Consulting Party for the NRHP-listed International Harvester building at 810 W. North Avenue. Notwithstanding our desire to reach a mutually agreeable understanding, however, Q Development reserves all rights and remedies, including commencing appropriate legal action if the Railroad Project is not changed to preserve the approved and allocated tax credits supporting the redevelopment of Allegheny Branch House Lofts.

Please contact me with any questions or feedback in response to this letter.

Best Regards,

A handwritten signature in blue ink, appearing to read 'Rick Belloli', written over the printed name.

Rick Belloli
Q Development
810 W. North Ave Associates LP
828 W. North Ave Associates LP

cc: B. Callahan, B. Frederick; Pennsylvania State Historic Preservation Office
C. Moon-Sirianni; Pennsylvania Department of Transportation
K. Lucas, E. Setzler; City of Pittsburgh Department of Mobility and Infrastructure
S. Quinn; City of Pittsburgh Historic Review Commission
B. Wilson, M. Burny; Office of Councilman Wilson, District 1
K. McKeegan, Meyer Unkovic & Scott

enclosures

International Harvester Company of America: Pittsburgh Branch House

Relationship of Proposed Action to Historic Property and Assessment of Project Effects

The Preferred Alternative for the W. North Avenue Bridge Project would require replacement of the bridge superstructure and repairs to its substructure to raise the bridge. To accommodate the raised bridge elevation, roadway approach work along W. North Avenue would extend approximately 155' to the west and 240' to the east of the bridge. Approach work would include roadway pavement and sidewalk reconstruction, including the construction of a retaining wall in the northwest quadrant.

The Preferred Alternative has the potential to affect the NRHP-listed International Harvester Building as noted in the above assessment of the Allegheny Second Ward Industrial Historic District. The building would be directly affected by the construction of window wells or the shortening of three first-floor display windows, the potential raising of the limestone water table and windowsills, and the construction of a concrete stair to access an existing walkway along the building's northeast facade. The potential to affect the International Harvester Building is summarized in Table 5-11.

| Table 5-11: Results of Effect Evaluation for the International Harvester Building | |
|--|--|
| DEFINITION OF EFFECT | EVALUATION (Preferred Alternative) |
| An effect may occur when there is alteration to the characteristics of a historic property qualifying it for inclusion in or eligibility for the NRHP as defined in Section 800.16(i). | The International Harvester Building is eligible for listing in the NRHP under Criteria A, B, and C. The Preferred Alternative has the potential to affect the historic property by requiring alterations to the building's front façade and by introducing new visual elements, such as the new W. North Avenue Bridge and elevated street and sidewalk grades along W. North Avenue. |
| FINDING: | <i>Historic Properties Affected</i> |

Application of the Criteria of Adverse Effect for the International Harvester Building

The Preferred Alternative would require a vertical alignment adjustment in the 800 block of W. North Avenue that would increase the profile grade to a maximum of 8.0%. Sidewalk grades would follow the roadway profile except for the sidewalk segment fronting the International Harvester Building, which would have a sidewalk length of 90' consisting of 30' ramp runs of 8.3% with two 5' level landings. The ramp runs would be separated from the roadway with a proposed landscape area in order to maintain access to the building's existing main entrance. While the doorway would not require alteration, three partially infilled first-floor display windows east of the doorway would need to be protected by window wells or shortened by raising the limestone water table and sills to accommodate the increased vertical alignment of the sidewalk. The windows were shortened, and the limestone water table was raised when the vertical alignment of W. North Avenue raised ca. 1929 and again in the 1940s, resulting in the stepped water table seen on the building today. Both window treatment alternatives will be explored with the property owner prior to final design. Concrete stairs would be constructed to access the existing walkway along the building's northeast façade, and a 27' retaining wall with a protective fence would be constructed along W. North Avenue between the stairs and the new bridge.

Determination of Effects Report:

To further address the potential effects on the International Harvester Building as indicated above, Table 5-12 applies the Criteria of Adverse Effect to the historic property in accordance with 36 CFR 800.5(a)(1).

| Table 5-12: Application of the Criteria of Adverse Effect for the International Harvester Building | |
|---|--|
| <p>Criteria of Adverse Effect: An adverse effect is found when an undertaking may alter, directly or indirectly, any characteristics of a historic property that qualify the property for inclusion in the NRHP in a manner that would diminish the integrity of the property’s location, design, setting, materials, workmanship, feeling, or association. Consideration shall be given to all qualifying characteristics of a historic property, including those that may have been identified subsequent to the original evaluation of the property’s eligibility for the NRHP. Adverse effects may include reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance or be cumulative.</p> | |
| Examples of Adverse Effects, pursuant to Section 800.5(a)(2) | Evaluation |
| Adverse effects on historic properties include, but are not limited to: | |
| (i) Physical destruction of or damage to all or part of the property; | While the Preferred Alternative would require the construction of window wells or shortening of three infilled first-floor display windows, which have been modified in the past, alternatives have been developed that would minimize damage to the historic property. |
| (ii) Alteration of a property, including restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation and provision of handicapped access, that is not consistent with the Secretary’s Standards for the Treatment of Historic Properties (36 CFR§68) and applicable guidelines; | The Preferred Alternative would raise the street and sidewalk along the International Harvester Building for a distance of approximately 90’ consisting of 30’ ramp runs of 8.3% with two 5’ level landings. The ramp runs would be separated from the roadway with a proposed landscape area in order to maintain ADA-compliant access at the building’s existing entrance. No physical changes on the interior are required. Required exterior changes to the three display windows noted above will be executed in accordance with the SOI Standards. |
| (iii) Removal of the property from its historic location; | The Preferred Alternative would not result in the removal of the property from its historic location. |
| (iv) Change of the character of the property’s use or of physical features within the property’s setting that contribute to its historic significance; | The Preferred Alternative would not change the historic property’s use. The project would not affect features that contribute to the property’s significance; the W. North Avenue Bridge and the existing modern streetscape elements do not contribute to the property’s setting. |

| Table 5-12: Application of the Criteria of Adverse Effect for the International Harvester Building | |
|--|---|
| (v) Introduction of visual, atmospheric, or audible elements that diminish the integrity of the property's significant historic features; | The Preferred Alternative would not introduce atmospheric or audible elements that diminish the integrity of the historic property's character-defining features. The visual effects of the project on the historic property will be minor. The new W. North Avenue Bridge, the raising of the street and sidewalk grade, the bifurcation of a modern sidewalk, and the alteration of recent landscape elements would not result in a substantial visual change within the viewshed of the historic property. |
| (vi) Neglect of a property which causes its deterioration, except where such neglect and deterioration are recognized qualities of a property of religious and cultural significance to an Indian tribe or Native Hawaiian organization; and | The Preferred Alternative would not cause neglect of the property resulting in its deterioration. |
| (vii) Transfer, lease, or sale of property out of Federal ownership or control without adequate and enforceable restrictions or conditions to ensure long-term preservation of the property's historic significance. | The property is not under Federal ownership or control. |
| OTHER: | |
| FINDING: The W. North Avenue Bridge Project results in a finding of <i>No Historic Properties Adversely Affected</i> for the International Harvester Building under the Preferred Alternative . | |

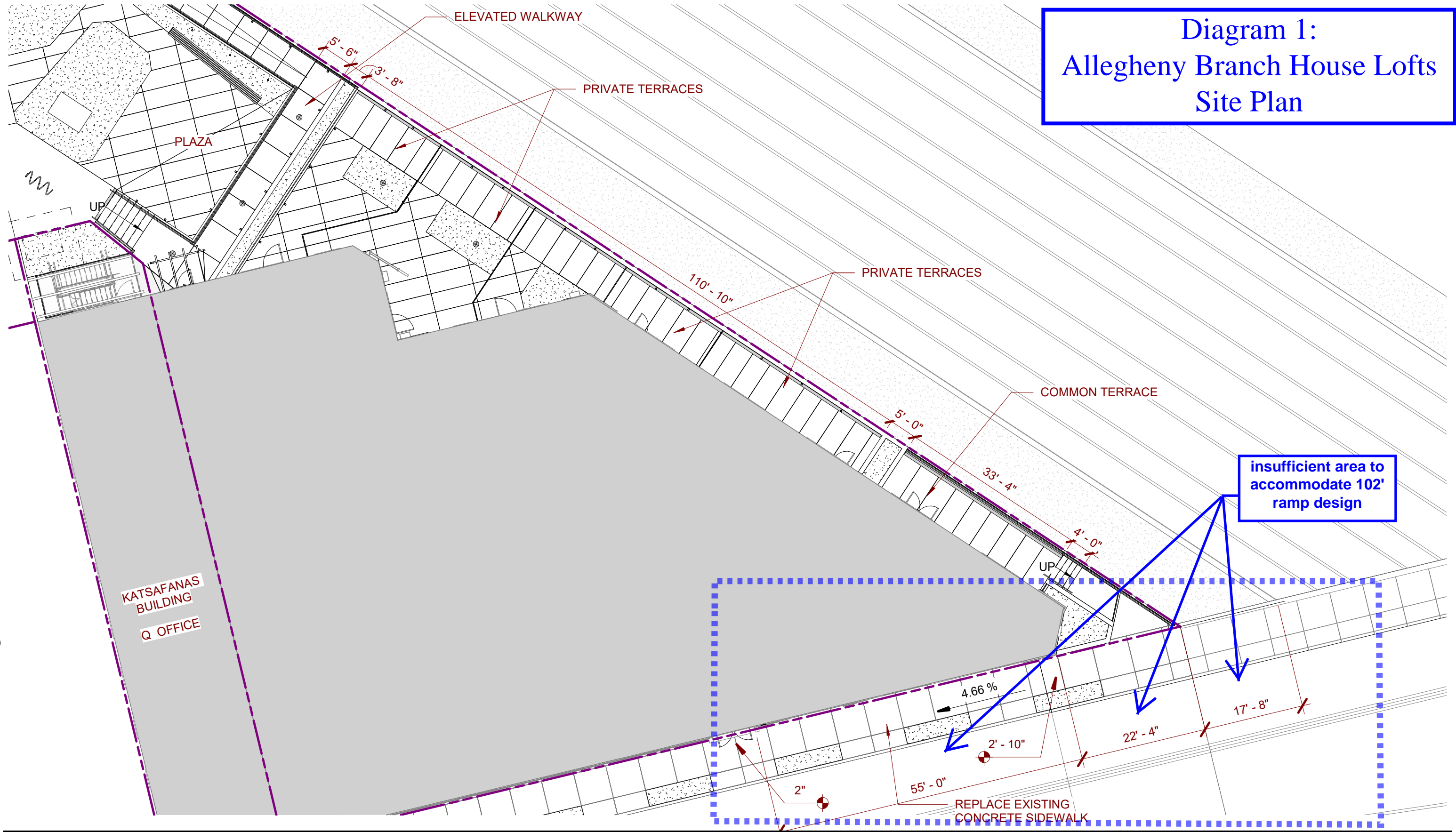
Allegheny City Stables Building

Relationship of Proposed Action to Historic Property and Assessment of Project Effects

The Preferred Alternative for the W. North Avenue Bridge Project would require replacement of the bridge superstructure and repairs to its substructure to raise the bridge. To accommodate the raised bridge elevation, roadway approach work along W. North Avenue would extend approximately 155' to the west and 240' to the east of the bridge. Approach work would include roadway pavement and sidewalk reconstruction.

No project activities would occur within the property boundary. The proposed vertical alignment adjustment in the 800 block of W. North Avenue would terminate approximately 100' east of the property boundary (Figure 5-57). The potential to affect the Allegheny City Stables Building is summarized in Table 5-13.

Diagram 1:
Allegheny Branch House Lofts
Site Plan

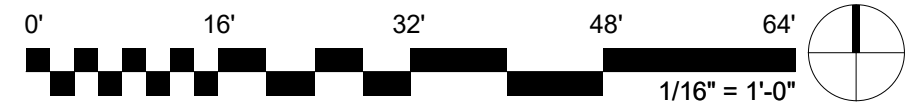


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ALLEGHENY BRANCH HOUSE LOFTS



Site Plan

Map 1: Allegheny West Loft District Master Plan

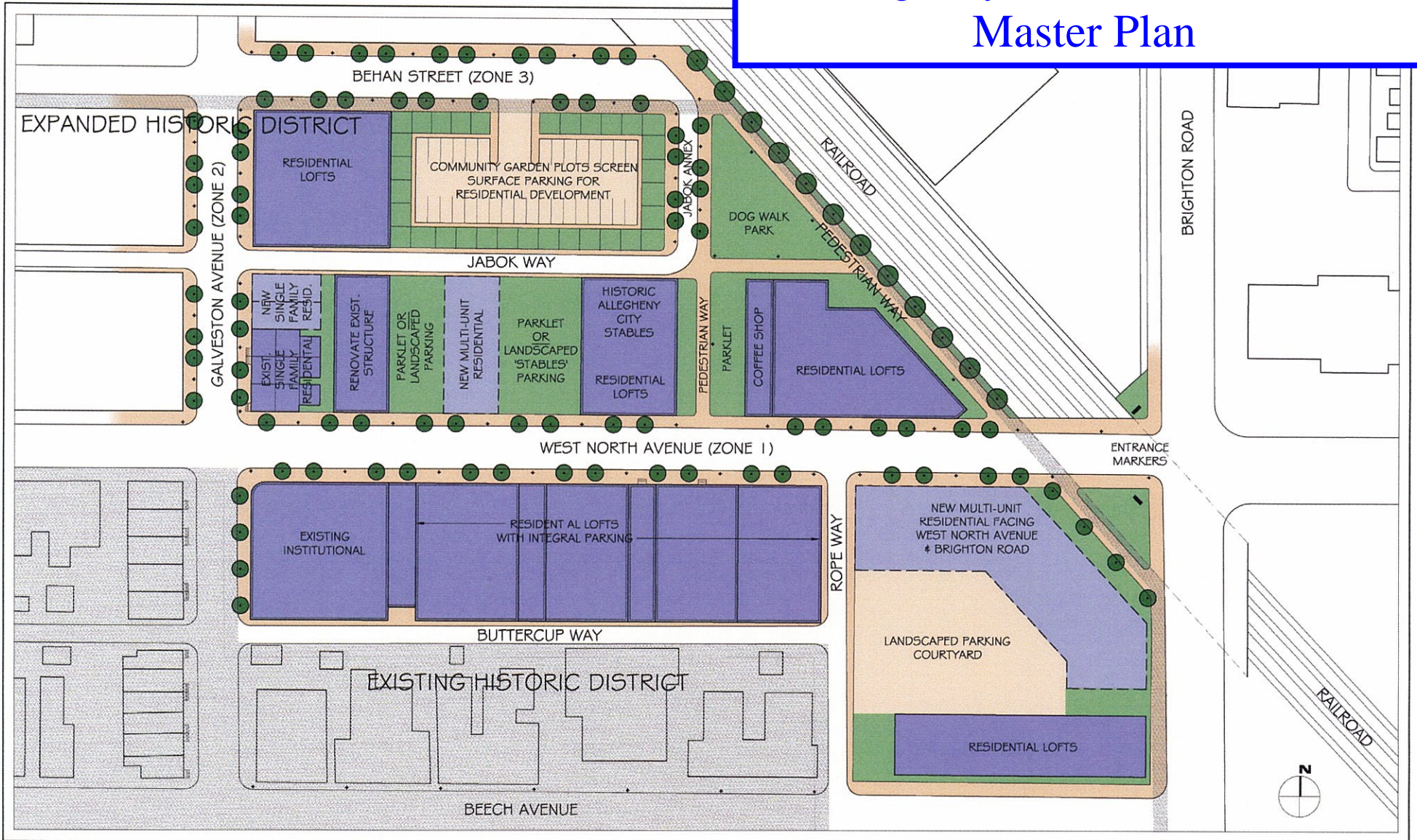
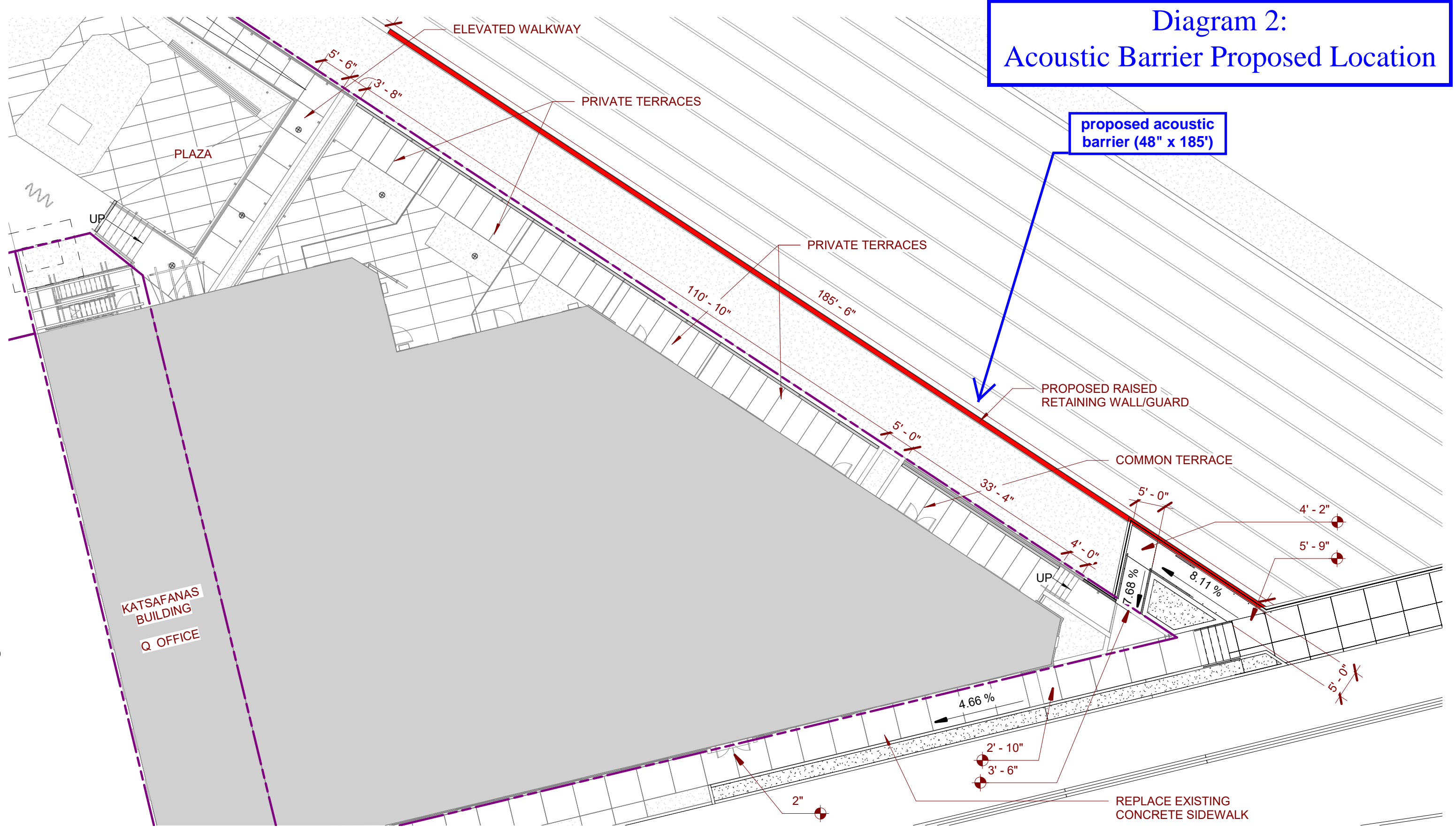


Diagram 2:
Acoustic Barrier Proposed Location

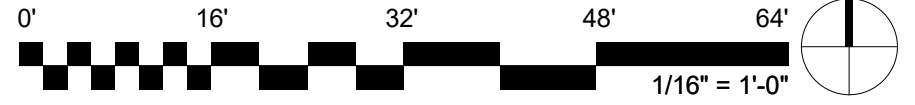


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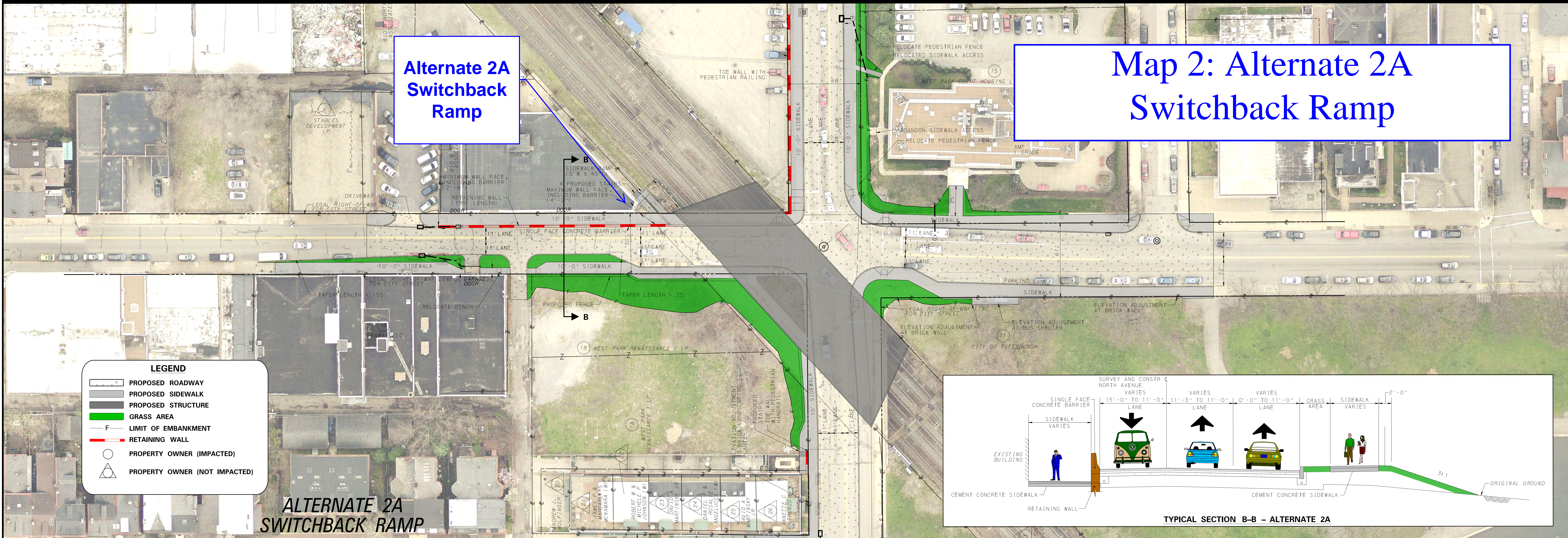
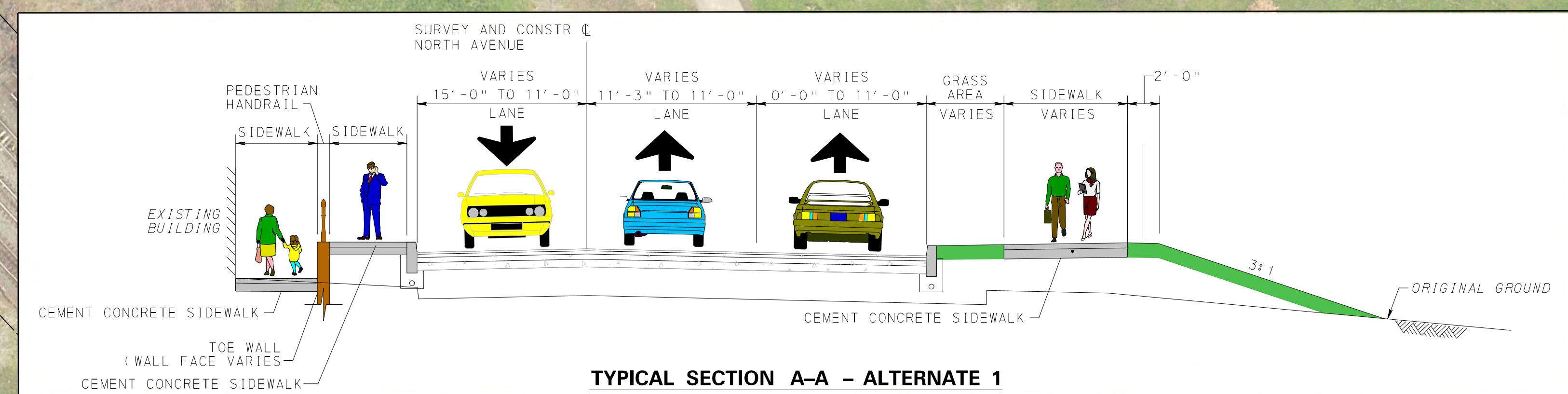
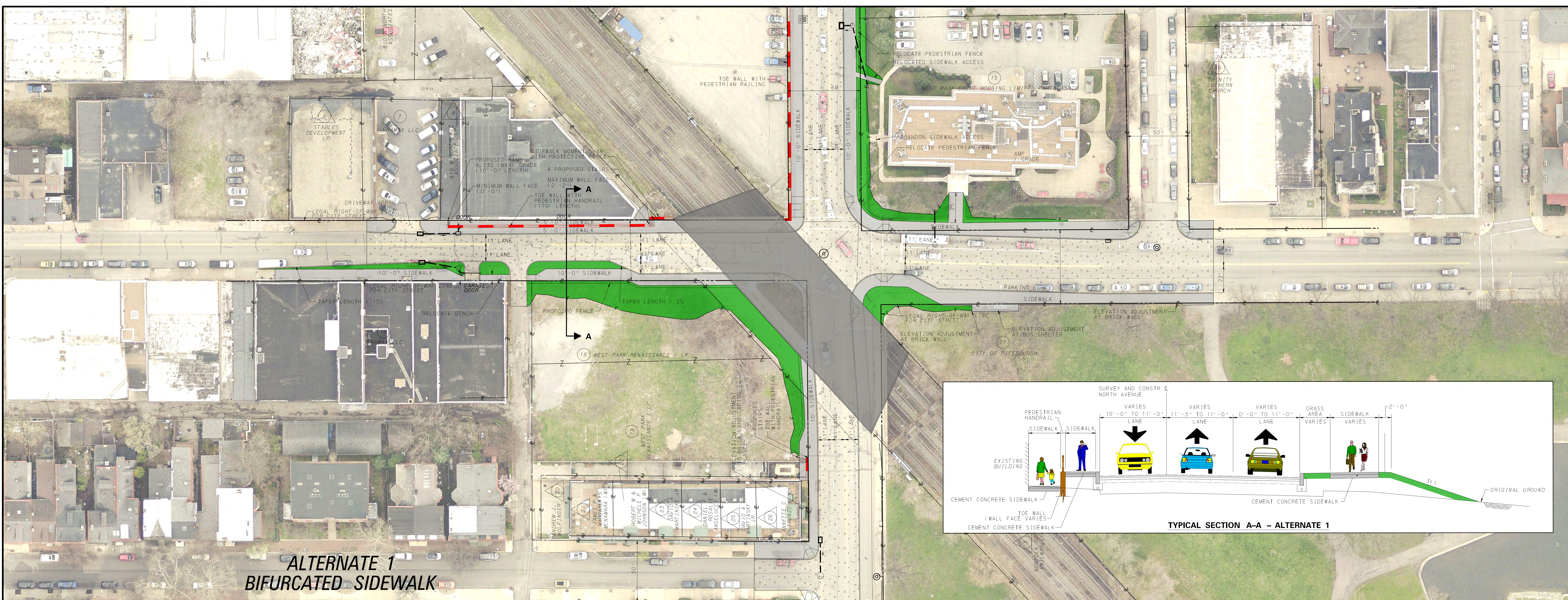
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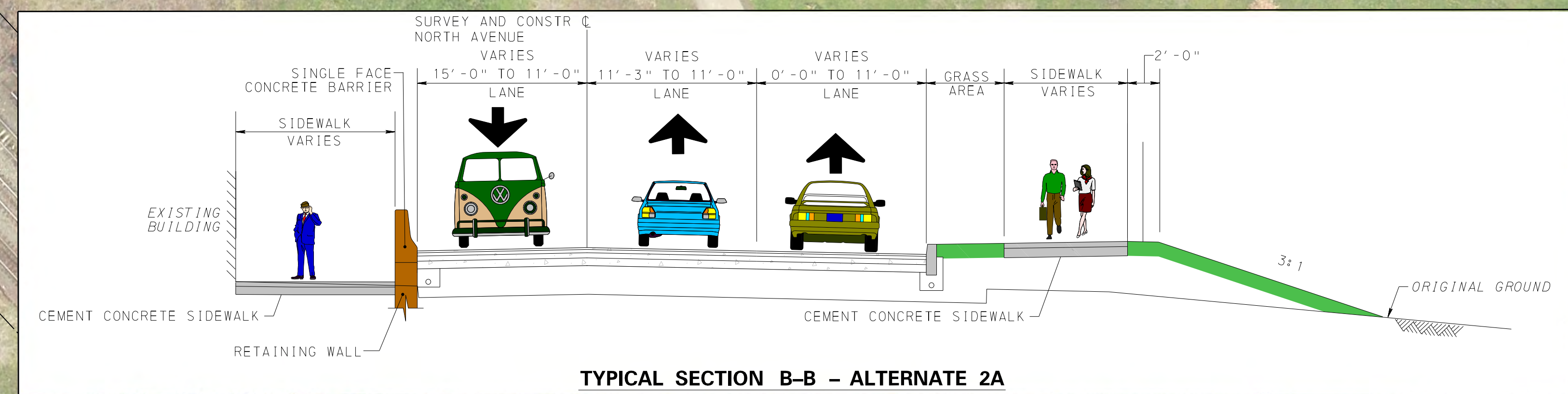
ALLEGHENY BRANCH HOUSE LOFTS



Vertical Clearance Proposed Concept



**Map 2: Alternate 2A
Switchback Ramp**



Rendering 1: Alternate 2A Refined

new windows for entire window opening while retaining existing water table

access to historic loading dock preserved from sidewalk without retaining wall

note: switchback ramp minimizes grade changes of sidewalk (<8.3% grade)

sidewalk design does not necessitate railings or landings

bifurcated roadway height vs sidewalk height with separation landscaping, but maximizes width of sidewalk

this portion of sidewalk requires cross-easement between Q/NSRR to remain ADA compliant

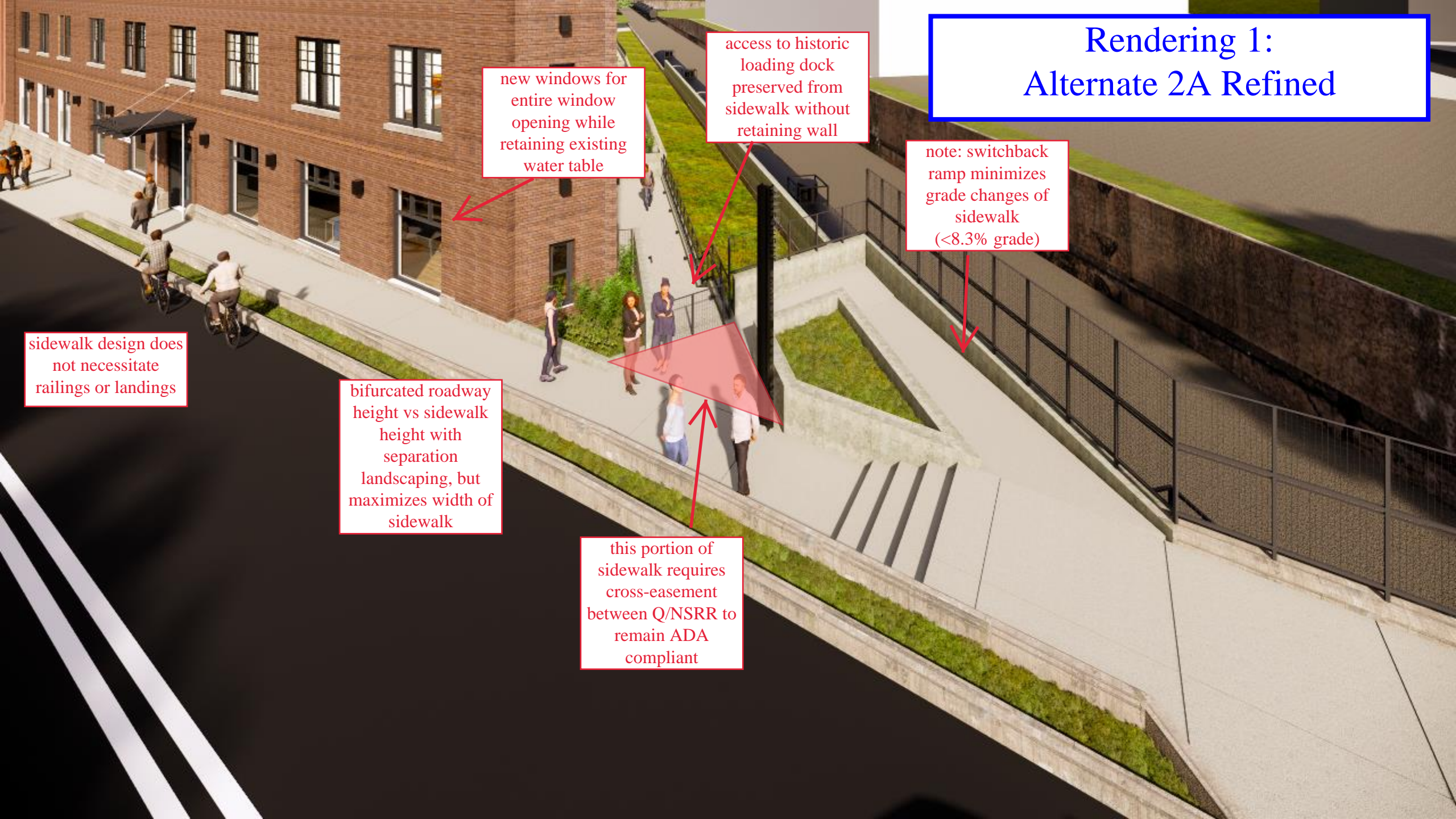
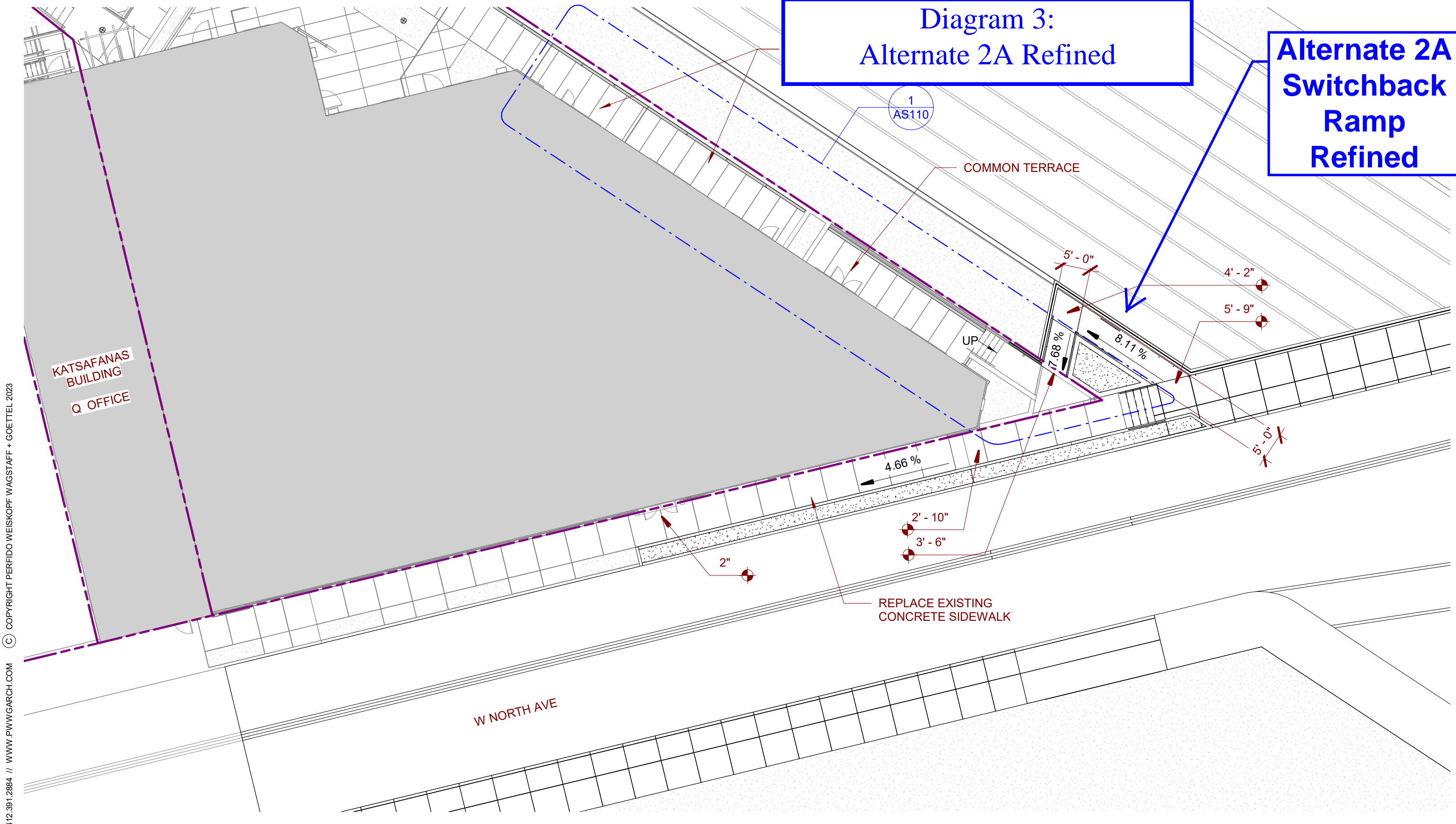


Diagram 3:
Alternate 2A Refined

Alternate 2A
Switchback
Ramp
Refined



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ALLEGHENY BRANCH HOUSE LOFTS



Vertical Clearance Proposed Concept



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