



# Pennsylvania State Historic Preservation Office

PENNSYLVANIA HISTORICAL AND MUSEUM COMMISSION

January 13, 2023

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

RE: ER Project # 2018PR13984.022, 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. 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.

### **Above Ground Resources**

We request a written response to our questions regarding the Determination of Effect Report outlined in our letter of December 13, 2022. In addition, we offer the following comments, for consideration and response, regarding the December 14, 2022 Consulting Party Meeting, Alternatives Analysis Report, and the January 11, 2023 letter from Q Development.

### **December 14, 2022 Consulting Party Meeting**

At the December 14, 2022 consulting party meeting, the specific clearances at each of the five obstruction locations identified in the report was briefly discussed. While the project's purpose and need indicates the PUC requirement for vertical clearances is 22'-0", with waivers, the specific level of vertical clearance required at each of the five locations is unclear. The clearances proposed for the preferred alternatives presented in the Alternatives Analysis and Effect Reports are as follows, ordered from least to greatest amounts: 21'-0" at the Amtrak Station; 21'-1" at Columbus Avenue Bridge; 21'-2" at the Pennsylvania Avenue Bridge; 21'-4" at the West North Avenue Bridge; and 21'-9" at the Washington Avenue Bridge. As outlined in our letter of December 13, 2022, we require more detailed information on the specific requirements of each of the five obstruction locations. Given lower clearances at other obstruction locations, can the height clearances of the preferred alternatives for those locations where there is the potential for an adverse effect (West North Avenue Bridge and Pennsylvania Avenue Bridge) be reduced to minimize impacts to the adjacent historic properties?

Also at the December consulting party meeting, there was discussion of construction of a pedestrian bridge that would connect the two sides of Allegheny Commons, now separated by the railroad. We understand the pedestrian bridge is to be constructed before work at the obstruction locations. To date we have received no information on this part of the project and request consultation including: a purpose and need statement, mapping of the proposed project and Area of Potential Effect (APE), photographs of the APE, plans or specifications, including proposed design and materials. In addition, what are the potential effects of this bridge project on the National Register of Historic Places (National Register)-listed Allegheny Commons Historic District? Has there been any public

feedback on the proposed pedestrian bridge and its potential to affect Allegheny Commons? What efforts have been made to minimize effects of the pedestrian bridge on historic properties?

### **Alternatives Analysis Report and Assessment of Effect**

#### *Washington Avenue Bridge*

Of the alternatives considered, we agree that the preferred alternative (alternative 3 with design modifications) best minimizes effects to the Pennsylvania Railroad: Main Line (Harrisburg to Pittsburgh) Railroad Corridor Historic District as this alternative would not require work that might affect buildings or driveway entrances on Washington Avenue. (This area was not previously identified as a historic district, but the Alternatives Analysis report indicates there may be the potential for a district at this location). Contributing features that will be affected by the preferred alternative include the superstructure and substructure of the Washington Avenue Bridge, adjacent stone retaining walls along Palmer Street and Washington Avenue, and decorative wrought iron fencing. If the plans and specifications provide for protection of these contributing features during exposure and construction as well as commit to restoration of the affected portions of the features to match the old in size, scale, design, color, finishes, materials, and construction techniques, we agree the project should not adversely affect the Pennsylvania Railroad: Main Line (Harrisburg to Pittsburgh) Railroad Corridor Historic District.

#### *Amtrak Station*

Of the alternatives considered, we agree that the preferred alternative (alternative 3) best minimizes effects to the Pennsylvania Railroad Station and the Pennsylvania Railroad: Main Line (Harrisburg to Pittsburgh) Railroad Corridor Historic District. Alternative 3 accommodates historic preservation concerns alongside the project purpose and need by accommodating vertical clearance needs through limited modifications to the girders and exhaust shoots at Tracks 1 and 2 of the trainshed rather than removal of entire portions of the trainshed (alternative 2). The changes will be compatible with existing materials and features, and the original construction techniques and craftsmanship will be visible elsewhere within the structure. Therefore, we agree the preferred alternative should not adversely affect the Pennsylvania Railroad Station and the Pennsylvania Railroad: Main Line (Harrisburg to Pittsburgh) Railroad Corridor Historic District.

We agree the preferred alternative does not have the potential to affect The Rotunda of the Pennsylvania Railroad Station.

#### *West North Avenue Bridge*

The preferred alternative (alternative 2 with design modifications) proposes removal of the entire superstructure, replacement with a single-span prestressed concrete spread box beam of greater width, an increase in the height and length of abutments, and an increased vertical grade at both the bridge and its approaches to accommodate a height of 21'-4". Alternative 3, which had lesser impacts to historic properties, was dismissed in the Alternatives Analysis Report as it would reduce the number of tracks through the area from four to three. While we understand replacement of the bridge is needed and there will be an adverse effect to the Pennsylvania Railroad: Main Line (Harrisburg to Pittsburgh) Railroad Corridor Historic District, it is necessary to ensure adequate consideration of alternatives that avoid or minimize potential adverse effects to historic properties.

Within the Pennsylvania Railroad: Main Line (Harrisburg to Pittsburgh) Railroad Corridor Historic District, alternative 2 with design modifications would affect the bridge superstructure,

substructure, retaining walls, and fencing as well as an out-of-service railroad siding, all contributing features. As outlined in our letter of December 13, 2022, please provide more information on the proposed replacement structure, plans for the reconstruction or restoration of contributing features, and a discussion of potential effects to the railroad siding.

Within the Allegheny Commons Historic District, alternative 2 with design modifications has the potential to adversely affect the park through the introduction of new features including a new bridge, sidewalk replacement and toe wall construction, changes to the bus shelter, and replacement of the existing retaining wall and railing along the east side of Brighton Road. Please provide further detail on consideration of minimization of the effects of the design on these and other contributing features in the park. Please include a more detailed discussion of the potential for cumulative visual effects on the park including renderings showing the proposed new features in the setting of the historic district.

To accommodate the increased grade, alternative 2 with design modifications proposes changes to the International Harvester Building, individually listed in the National Register and a contributing feature to the National Register-eligible Allegheny Second Ward Industrial Historic District. The windows and water table are character-defining features of the International Harvester Building, and alterations to the openings and appearance of the front elevation as part of the preferred alternative have the potential to affect integrity and adversely affect the resource and district. The loading dock adjacent to the railroad siding is also a character defining feature that has the potential to be affected by the current design. In addition, we are concerned about the introduction of new features (elevated sidewalk, ramps, railings, and a retaining wall) at the primary façade.

Further documentation and consideration of alternatives that limit changes to the Pennsylvania Railroad: Main Line (Harrisburg to Pittsburgh) Railroad Corridor Historic District, the Allegheny Commons Historic District, the International Harvester Building, and the Allegheny Second Ward Industrial District is required. This should include reconsideration of the amount of vertical clearance needed at this obstruction location, a clear understanding of the pedestrian and ADA accessibility requirements adjacent to the International Harvester Building, and consideration of alternative designs that accommodate the increased vertical grade of the bridge approaches.

#### *Pennsylvania Avenue Bridge*

Of the alternatives considered, alternatives 2 with design modifications (preferred) and 4 best minimize effects to the Pennsylvania Railroad: Main Line (Harrisburg to Pittsburgh) Railroad Corridor Historic District as they do not require buttressing of the concrete retaining walls that line the railroad historic district (alternative 3).

The bridge superstructure and substructure do not contribute to the significance of the railroad district as they were replaced after the period of significance of the railroad. To minimize changes to the railroad district, a steel pony truss similar in scale and configuration to the original ca. 1905 pony truss bridge is proposed. Contributing features that will be affected include the concrete retaining walls with stone coping, safety railings, and decorative wrought iron fencing. If the plans and specifications provide for protection of these contributing features during construction as well as commit to restoration of the affected walls and fencing to match the old in size, scale, design, color, finishes, materials, and construction techniques, we agree the project should not adversely affect the Pennsylvania Railroad: Main Line (Harrisburg to Pittsburgh) Railroad Corridor Historic District.

Both alternative 2 with design modification (preferred) and alternative 4 would require modifications to the bridge approaches resulting in the introduction of new features into the setting

of 901 Pennsylvania Avenue, a contributing feature in the Allegheny Second Ward Industrial Historic District. These new features will include a bifurcated sidewalk with handicap ramp and handrail. As currently designed, to accommodate the ramp, it will be necessary to cover over a portion of the brick side wall (up to 11" high) of 901 Pennsylvania Avenue. Further information is required before we can comment on the potential for the project to adversely affect the Allegheny Second Ward Industrial District. Please provide specifications for the pedestrian and ADA accessibility requirements adjacent to 901 Pennsylvania Avenue and discuss efforts made to minimize effects to 901 Pennsylvania Avenue.

#### *Columbus Avenue Bridge*

Of the alternatives considered, we agree that the preferred alternatives (3A with design modification or 3B with design modification) best minimize effects to the Pennsylvania Railroad: Main Line

(Harrisburg to Pittsburgh) Railroad Corridor Historic District. The 1907 superstructure has lost integrity of design and workmanship and does not contribute to the district. While work to contributing features of the district (bridge substructure, retaining walls, and iron fencing) is proposed, the preferred alternatives eliminate the need for work along Columbus Avenue and potential impacts to the 1907 Columbus Avenue approach ramp, another contributing feature to the district. If the project plans and specification provide for protection for the substructure, adjacent concrete retaining walls and fencing during construction as well as commit to restoration of those features that are affected during construction by matching the old in size, scale, design, color, finishes, materials, and construction techniques, we agree the project should not adversely affect the Pennsylvania Railroad: Main Line (Harrisburg to Pittsburgh) Railroad Corridor Historic District.

#### **January 11, 2023 Q Development Response Letter**

We have reviewed the comments on the Determination of Effect Report provided by Q Development on January 11, 2023. For the West North Avenue Bridge Project, we echo their concerns about the potential adverse effect to the International Harvester Building as the alterations to the building are not in keeping with the Secretary of the Interior's Standards. At this time, it is unclear if these changes would jeopardize the \$2.5 million in Rehabilitation Investment Tax Credits approved by the National Park Service in August of 2022. We would also like to request consideration of alternative sidewalk designs to minimize effects to the International Harvester Building, including those provided by Q Development in their response letter.

Regarding the noise wall requested by Q Development, please note, we have concerns about the potential visual effects as it will introduce new features into the setting of several historic properties.

In conclusion, this letter should not preclude consideration of any comments provided by local consulting parties. Please share our comments with the local consulting parties and continue to provide copies of any comments from other consulting parties to our office. We look forward to additional consultation to avoid, minimize, and mitigate for adverse effects to historic properties.

For questions concerning this review, please contact Barbara Frederick at [bafrederic@pa.gov](mailto:bafrederic@pa.gov).

Sincerely,



Emma Diehl

Environmental Review Division Manager