



Pennsylvania State Historic Preservation Office

PENNSYLVANIA HISTORICAL AND MUSEUM COMMISSION

June 13, 2023

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

RE: ER Project # 2018PR13984.027, 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.

Thank you for a copy of the presentation made at the May 2, 2023 consulting party meeting and the meeting minutes. We offer the following comments:

International Harvester Building

Regarding Option 6, while a fence will be introduced within the streetscape, the new design will not result in raising of the limestone water table and sills to accommodate the increased vertical alignment of the sidewalk, thereby avoiding an adverse effect. Please provide more detailed information on the revised design of the sidewalk, landscaping and related features adjacent to the International Harvester Building. Please indicate how the design meets the requirements of the City's Department of Mobility and Infrastructure and the Secretary of Interior's Standards for the Treatment of Historic Properties and thereby avoids an adverse effect.

Allegheny Commons Historic District

Thank you for the additional information on efforts to avoid or minimize adverse effects to the district presented at the May 2, 2023 meeting. We remain concerned about the introduction of the new pedestrian bridge in the historic district. The bridge will be constructed in the historic location of a pedestrian bridge, reusing approach steps, and will restore pedestrian access to both sides of the park. It will also introduce a new design feature into the setting of the district. We understand a Design Advisory Team (DAT) is being formed to vet the proposed designs for the new Allegheny Commons Pedestrian Bridge and the new West North Avenue Bridge as well as any resultant park landscaping or other features to ensure compatibility within Allegheny Commons Historic District. If the DAT follows the Secretary of the Interior's Standards for the Treatment of Historic Properties and focuses on the preservation of character defining features identified in the 2013 National Register nomination, the project should have a No Adverse Effect on the Allegheny Commons Historic District. This finding is conditional on conformance of the designs with the Standards. The Standards should be included in guiding principles for the DAT, as outlined below.

- Character defining features of the park within the project area for the new bridges will be identified and preserved during the design process.
- The new designs will be compatible with the overall historic character of the district and will not alter the integrity of design, setting, materials, workmanship, and feeling of the district.
- The size, scale, and materials of the new designs will be compatible with the adjacent district.
- The new design will be clearly differentiated from the original features in the district.
- The new structure will be designed to avoid demolition or alteration of features that contribute to the public landscape, including the steps of the former pedestrian bridge, trees, and the circulation system.
- The new structure will be designed to be in keeping with the requirements of the City Historic Designation.

The design of the new bridge through the DAT and the guiding principles is necessary to avoid an adverse effect and should be commemorated in the MOU for the project. The MOU should also provide for submission of the final design of the pedestrian bridge to the PA SHPO office. The MOU should also allow for reinitiating consultation under the State History Code should the PA SHPO find the selected design will have an adverse effect.

Minimization

The purpose of minimization is to lessen the potential effects of a project on historic properties. Minimization measures can be commemorated in the project agreement but should not be misconstrued as mitigation. The following minimization measures have been identified for the project to date:

- Consultation on the design of the West North Avenue Bridge, adjacent features (including the new bridge railing at Brighton Road), and landscaping (including the contributing low brick wall) in the Allegheny Commons Historic District.
- Consultation on the design of the new pedestrian bridge in the Allegheny Commons Historic District as well as adjacent features and landscaping.
- Formation of a Design Advisory Team to review the proposed designs for the West North Avenue Bridge and the new pedestrian bridge to ensure compatibility with the Allegheny Commons Historic District.
- Consultation on the design of the sidewalk, landscaping and related features adjacent to the International Harvester Building.
- Consultation on protection for/repairs to contributing features within the Pennsylvania Railroad: Main Line (Harrisburg and Pittsburgh) Railroad Corridor Historic District including bridge abutments, retaining walls and decorative fencing.

These and any additional minimization efforts outlined in past documents, discussions, and in the presentation for the May 2, 2023 meeting should be commemorated in the MOU for the project.

Mitigation

As outlined in our letter of April 13, 2023, mitigation should be identified as part of a consultative process that involves an active exchange of information between the PA SHPO and all the consulting parties to the State History Code review. As discussed at the meeting, previous commitments developed as part of the PUC mediation process should not be misconstrued as mitigation for the State History Code process or preclude consideration of other mitigation ideas. As outlined in our

letter of April 13, 2023, the PA SHPO views replacement of the pedestrian bridge as part of the larger project and not as mitigation for the adverse effect.

Mitigation measures discussed at the May 2, 2023 meeting include the following:

- Restoration or repair of fencing throughout Allegheny Commons Historic District
- Restoration of the stone building near the tennis courts
- Installation of low pipe railing on the west side of the park
- Additional ideas outlined in the park management plan

We look forward to participation in the Design Advisory Team and continued consultation on the project. For questions concerning this review, please contact Barbara Frederick at bafrederic@pa.gov.

Sincerely,



Emma Diehl

Environmental Review Division Manager