

B&P TUNNEL REPLACEMENT PROGRAM PROJECT CHANGES TRANSMITTAL #1

TO: Programmatic Agreement Signatories and Other Consulting Parties, B&P Tunnel Replacement Program

FROM: Nancy L. Zerbe, ARCH², Inc., a subcontractor to Parsons Brinckerhoff/Parsons JV, on behalf of Amtrak

CC:

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DATE: October 5, 2022

SUBJECT: Notification of Project Changes

The Programmatic Agreement (PA) for the Baltimore & Potomac (B&P) Tunnel Replacement Program (Program), executed under Section 106 of the National Historic Preservation Act, provides a process for consulting with Signatories and other Consulting Parties regarding project changes that develop subsequent to the execution of the PA in 2017.¹ These changes may occur for a variety of reasons, including as a result of advancement of the project design, response to new conditions in the field, or identification of new historic properties that could be affected by the Program.

For any changes, Amtrak will assess if there is the potential to affect historic properties. If there is no potential, Amtrak will document the finding and retain it as part of the project record. If, however, a change has the potential to affect historic properties, Amtrak or the Federal Railroad Administration (FRA) will notify PA Signatories and other Consulting Parties. The notification will be sent in the form of either a Section 106 consultation letter from FRA to the Maryland State Historic Preservation Officer (SHPO) or a "Project Changes Transmittal" on behalf of Amtrak, such as this first transmittal. Project Changes Transmittals will include the following material for each proposed project change:

- Brief description of the project change and reason why the change is needed
- Map and photo(s)
- Plan sheets or sketches, if applicable
- Plan for any proposed Section 106 work (e.g., identification of historic properties, assessment of effects, and resolution of adverse effects), as needed.

¹ Since the execution of the *Project Programmatic Agreement Among the Federal Railroad Administration, Maryland State Historic Preservation Officer, National Railroad Passenger Corporation and Preservation Maryland Regarding the Baltimore & Potomac Tunnel Project, Baltimore City, Maryland*, Amtrak has renamed the project the "B&P Tunnel Replacement Program." The change to the term "Program" reflects that the Program requires execution of multiple individual projects throughout the approximately four-mile corridor to complete the envisioned scope of improvements. Therefore, the term "Program" will be used in future correspondence. Individual projects under the Program will be referred to as projects. This does not affect the validity of the Programmatic Agreement.

Per the PA, all materials will be reviewed and approved by FRA prior to transmittal, and Signatories and other Consulting Parties will have an opportunity to comment.

Design Changes

Midtown Edmondson Historic District

Utility relocations and construction staging requirements necessitate the acquisition of additional properties that are located within the Midtown Edmondson Historic District and that are in close proximity to the proposed south portal construction area. The affected area includes a total of 23 parcels on a primarily residential block that is bounded by N. Pulaski Street to the west, W. Lafayette Avenue to the north, N. Brice Street to the east, and W. Lanvale Street to the south (see Figure 1). The parcels consist of nine rowhouses located at 2022-2038 W. Lanvale Street, three rowhouses at 812/814/816 N. Brice Street, and 11 vacant lots at 800-810 / 818 N. Brice Street, 2040 W. Lanvale Street, and 2023/2025/2027 W. Lafayette Avenue.

The 12 rowhouses that are to be acquired will be demolished and the land used to facilitate the construction of utilities, including the relocation of a 10'-6"-diameter storm drain, a 27" sanitary sewer, water mains, electrical conduits, gas mains, and service connections to surrounding buildings. Additionally, the acquisition of the properties will facilitate construction of the adjacent retaining walls, as well as the establishment of subsurface easements for tiebacks associated with the retaining walls for the proposed trackway. Finally, the land will provide construction laydown and storage areas. After construction, the land could be used for some of the environmental mitigation purposes called for in the March 2017 *Record of Decision* under the National Environmental Policy Act, for example, stormwater management, vacant lot greening, tree planting, and establishment of community gardens.

The 23 additional properties to be acquired are within the previously defined Area of Potential Effects (APE) for Architectural History; therefore, it does not need to be revised. The 12 rowhouses to be demolished were identified in the draft National Register of Historic Places (NRHP) nomination for the NRHP-eligible Midtown Edmondson Historic District as contributing elements of the historic district. All 12 of these properties retain sufficient integrity to contribute to the historic district. No further identification of historic architectural properties is needed. In accordance with PA Stipulation VII.C., the potential to affect archeological deposits will be addressed in accordance with Stipulation VI., including, as needed, expanding the APE for Archeology.

In accordance with 36 CFR Part 800.5(a)(2)(i), "physical destruction of or damage to all or part" of a historic property is deemed to be an adverse effect. The proposed demolition of the 12 historic rowhouses will be part of the adverse effect to the Midtown Edmondson Historic District. In addition, this additional adverse effect finding does not alter the overall finding of the Program, which has already been determined to constitute an adverse effect.

When the PA was executed in 2017, it was anticipated that the Program would necessitate the acquisition and demolition of four rowhouses on the south side of W. Lanvale Street, i.e., 2039, 2041, 2043, and 2045 W. Lanvale Street. However, the three westernmost houses, i.e., 2041, 2043, and 2045 W. Lanvale Street, have been demolished by others, and the Program no longer requires the acquisition of 2039 W. Lanvale Street. These changes will lessen the Program's adverse effect.

Per the PA, Amtrak, as directed by and under the authority of FRA, proposes to mitigate the adverse effect due to the demolition of the 12 rowhouses through the Historic American Buildings Survey (HABS) documentation of the Midtown Edmondson Rowhouses (Stipulation V.E.1.e) and architectural salvage (Stipulation V.H.).

In addition, in compliance with PA Stipulation VI.C., all 23 parcels will be assessed for archeological potential as part of the Supplemental Phase IA Archeological Survey, and, if warranted, they will be subjected to further archeological investigation.

Passage of Time/ Re-evaluation of Properties' Significance

2000 W. Lafayette Avenue

The acquisition and demolition of 2000 W. Lafayette Avenue, a former grocery store constructed in 1965, was part of the Program and evaluation of effects under Section 106 prior to execution of the PA in 2017. However, the property has subsequently been determined to be historically significant for its contribution to the NRHP-eligible Midtown Edmondson Historic District due to a clarification in the final draft NRHP nomination for the historic district. In contrast to the original 2015 nomination, which did not specifically identify 2000 W. Lafayette Avenue as contributing to the historic district, the final draft clarifies that the property contributes to the historic district. Although the building is altered, it appears to retain sufficient integrity to contribute to the district. The 2000 W. Lafayette Avenue property is within the APE for Architectural History as originally defined and the Program activities have not changed at this location; therefore, the APE does not need to be revised. In addition, no further identification of historic architectural properties is needed.

In accordance with 36 CFR Part 800.5(a)(2)(i), "physical destruction of or damage to all or part" of a historic property is deemed to be an adverse effect. The proposed demolition of the commercial building at 2000 W. Lafayette Avenue will be part of the adverse effect to the Midtown Edmondson Historic District. In addition, this additional adverse effect finding does not alter the overall finding of the Program, which has already been determined to constitute an adverse effect.

Per the PA, Amtrak, as directed by and under the authority of FRA, proposes to mitigate the adverse effect due to the demolition of 2000 W. Lafayette Avenue through development of HABS documentation for the Midtown Edmondson Commercial and Industrial Corridor (Stipulation V.E.1.c). ARCH², Inc. Architectural Historian Nancy L. Zerbe, an Architectural Historian who exceeds the Secretary of the Interior's *Professional Qualification Standards for*

Archeology and Historic Preservation, has examined the building and has not identified any materials recommended for architectural salvage.

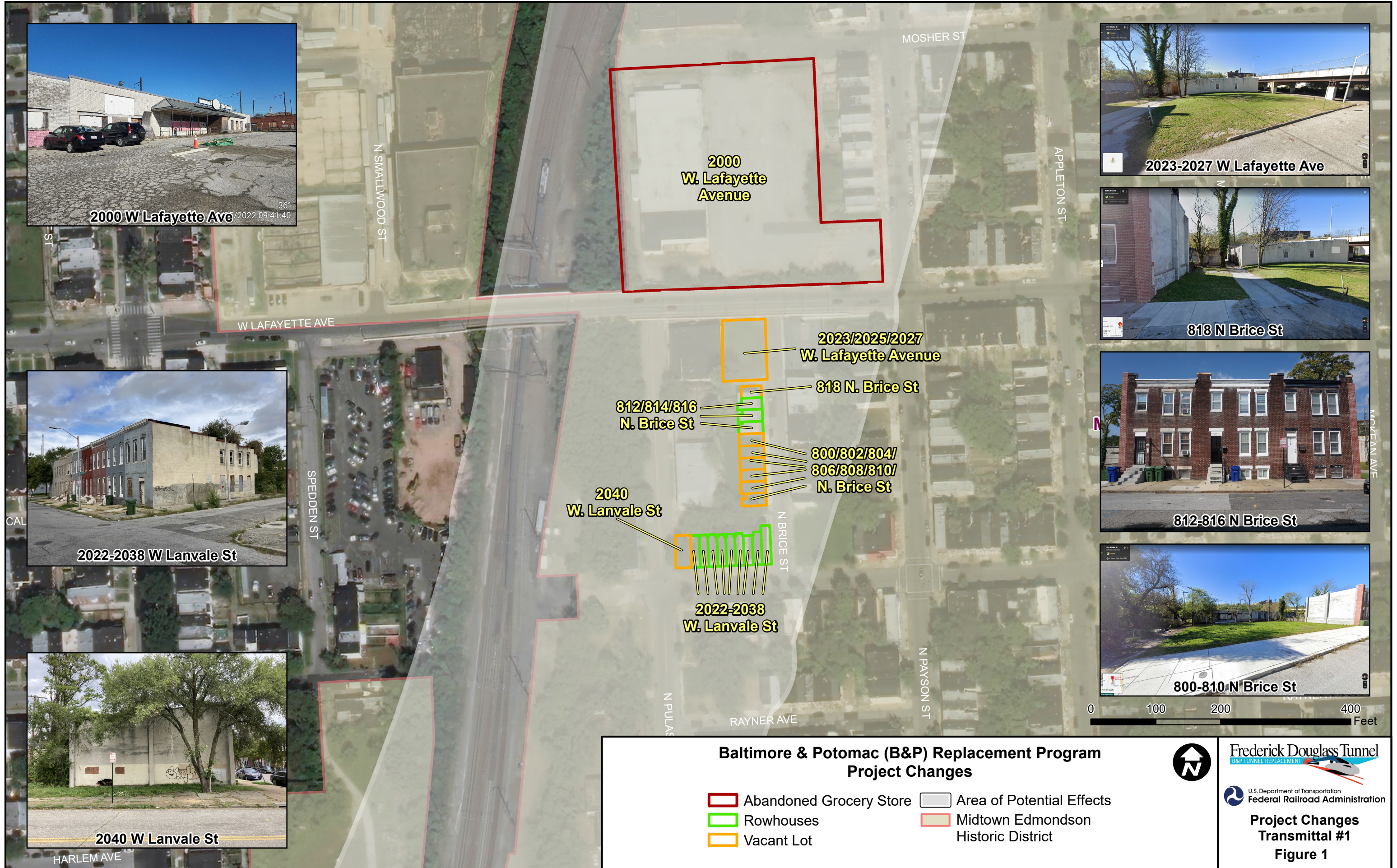
The 2000 W. Lafayette Avenue property was previously assessed for archeological potential as part of the Supplemental Phase IA Archeological Survey; therefore, the project change does not trigger the need for any additional archeological investigation.

Request for Comments

In accordance with Stipulation XI (Document Review) of the PA, Amtrak requests that you submit your written comments within 30 calendar days from the date of your receipt of this transmittal. Amtrak will consider all comments received within the allotted timeframe.

If you have any questions, please contact me at: Nancy Zerbe, ARCH², Inc., (908) 208-1288 or nzerbe@arch2inc.com.

Enclosure: Figure 1



**Baltimore & Potomac (B&P) Replacement Program
Project Changes**

Abandoned Grocery Store	Area of Potential Effects
Rowhouses	Midtown Edmondson Historic District
Vacant Lot	

Frederick Douglass Tunnel
B&P TUNNEL REPLACEMENT

Project Changes Transmittal #1
Figure 1