

B&P TUNNEL REPLACEMENT PROGRAM
(Now the FREDERICK DOUGLASS TUNNEL PROGRAM)
PROJECT CHANGE TRANSMITTAL #3

TO: Section 106 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

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| CC: Christeen Taniguchi, FRA | Luigi Rosa, Amtrak |
| Laura Shick, FRA | Mark Milton, Amtrak |
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DATE: September 7, 2023

SUBJECT: Notification of Project Change to Acquire the Entire Atlas Safe Deposit & Storage Company Warehouse Complex (MIHP# B-5118-2)

In accordance with the Programmatic Agreement (PA) for the Baltimore & Potomac (B&P) Tunnel Replacement Program (Program), executed under Section 106 of the National Historic Preservation Act (Section 106), Amtrak is providing to Signatories and other Consulting Parties this third notice of a project change (Stipulation VII). A project change may occur for a variety of reasons, including 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.

Description of Project Change and Need

This project change is for the proposed total acquisition of the 1.02-acre Atlas Safe Deposit & Storage Company Warehouse Complex (2150 Harlem Avenue and 2126 Edmondson Avenue), rather than the partial acquisition of the property (portion of 2150 Harlem Avenue) as accounted for in the Final Environmental Impact Statement (FEIS) and Record of Decision. There are no changes to the project construction plans.

The Atlas Safe Deposit & Storage Company Warehouse Complex has been evaluated as both individually eligible for inclusion in the National Register of Historic Places (NRHP) and contributing to the significance of the NRHP-eligible Midtown Edmondson Historic District (B-5118). The property consists of three buildings situated on an irregularly shaped two-parcel unpaved lot with each parcel having its own separate address (see Photos and Photo Key in Attachment A):

- The building at 2126 Edmondson Avenue, built in 1925, faces onto the street and is a four-story brick commercial/storage building with office space located in the front (south) sections of the building's first and second floors (Photos #1 & 2).
- Located immediately to the north of the 2126 Edmondson Avenue building is a two-story warehouse on the 2150 Harlem Avenue parcel that was built in 1946 (Photos #3 & 4).

- East of the warehouse on the 2150 Harlem Avenue parcel is a small, one-story truck garage that was built in 1948 (Photo #5).

As depicted in the October 2015 *B&P Tunnel Project, Baltimore, Maryland Architectural Historic Properties Effects Assessment Report*, north of Edmondson Avenue, the proposed new railroad alignment (shown in blue) will shift east of the existing alignment (shown in red) (see Attachment B). As discussed in the original Section 106 consultation materials and FEIS, this shift requires Amtrak to acquire and demolish the warehouse on the 2150 Harlem Avenue parcel, the northernmost building on the property.

During property acquisition negotiations between Amtrak and the Atlas Safe Deposit & Storage Company Warehouse Complex property owner, Amtrak determined in coordination with the owner that the warehouse on the 2150 Harlem Avenue parcel, proposed for demolition, encompasses 90% of the functionality and utility to the parcel's operating business. The building on the 2126 Edmondson Avenue parcel does not have heat or electricity throughout the building and does not have required egress on most floors (i.e., minimum window egress), rendering it functionally obsolete for the purpose of the currently operating business. The garage is in poor condition and does not provide any value or utility to the current business owner. As such, the proposed partial acquisition of the property would result in an uneconomic remnant for the owner. Therefore, in accordance with the Uniform Relocation Act (49 CFR Part 24), Amtrak cannot leave the property owner with an uneconomic remnant and is obligated to acquire the entire property.

Section 106 Analysis

The additional portion of the property to be acquired, which includes the other two buildings in the complex, is within the previously defined Area of Potential Effects (APE) for Historic Architecture. Therefore, the APE does not need to be revised.

The original assessment of effects determined that the acquisition and demolition of the warehouse on the 2150 Harlem Avenue parcel would constitute an adverse effect to the NRHP-eligible Atlas Safe Deposit & Storage Company Warehouse Complex and Midtown Edmondson Historic District. Under the proposed project change, Amtrak would acquire the two parcels (2150 Harlem Avenue and 2126 Edmondson Avenue) comprising the entire Atlas Safe Deposit & Storage Company Warehouse Complex property rather than only the warehouse portion of the 2150 Harlem Avenue parcel. The acquisition of the additional portion of the property would not constitute an additional adverse effect because neither of the additional two buildings to be acquired, the commercial/storage building at 2126 Edmondson Avenue and the small garage on the 2150 Harlem Avenue parcel, will be demolished. Also, Amtrak commits to maintain these buildings in accordance with the *Secretary of the Interior's Standards for the Treatment of Historic Properties* (SOI Standards). The proposed project change would not affect archaeological resources because no new ground disturbance is proposed.

Separate from this acquisition, Amtrak may use the property for Program purposes if a use is identified (e.g., salvage or other material storage, or workforce development site) and it is feasible in a manner that meets the SOI Standards. Amtrak will provide Signatories and other Consulting Parties with an opportunity to comment on the scope/design of proposed

modifications to the building that are required to support any proposed use. Proposed modifications would be subject to design review according to the process outlined in PA Stipulation XI.

Any future Amtrak work separate from the Program, including modifications to the property or relinquishment, would require Section 106 compliance. For any proposed modifications by Amtrak, it would ensure that all work on any of the property meets the SOI Standards. If Amtrak relinquishes the property, it would protect the property from insensitive modifications that do not meet SOI Standards through a preservation easement, local designation, or other means prior to relinquishment.

As part of the PA for the Program, FRA and Amtrak commit to mitigate the adverse effect to the Atlas Safe Deposit & Storage Company Warehouse Complex by salvaging historic building materials from the warehouse on the 2150 Harlem Avenue parcel (Stipulation V.H) and by preparing Historic American Building Survey (HABS) documentation of the entire complex as part of the Midtown Edmondson Commercial and Industrial Corridor recordation (Stipulation V.E). In accordance with the PA, Amtrak will make available the salvage material in coordination with PA signatories and concurring parties prior to its demolition; because no project work will involve the two additional buildings of the complex that Amtrak will acquire, they will have no salvage material. The HABS documentation, which is currently underway, will include the entire complex. Representative interior photos of the building at 2126 Edmondson Avenue will be included in the documentation. Because the acquisition will cause no new adverse effects, no additional mitigation is proposed.

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.

Enclosures:

Attachment A: Photo Key and Photographs

Attachment B: Alignment as Depicted in the October 2015 *B&P Tunnel Project, Baltimore, Maryland Architectural Historic Properties Effects Assessment Report*

Attachment A: Photo Key and Photographs



Attachment A: Photo Key and Photographs (continued)



Photo 1: 2126 Edmondson Avenue, commercial building to be acquired and maintained. View looking northeast.
Credit: Renee Bieretz, photographer, September 2021



Photo 2: 2126 Edmondson Avenue, commercial building to be acquired and maintained. View looking west.
Credit: Renee Bieretz, photographer, September 2021



Photo 3: 2150 Harlem Avenue warehouse to be demolished as originally intended. View looking southwest.
Credit: Renee Bieretz, photographer, September 2021



Photo 4: 2150 Harlem Avenue, warehouse. View looking north/northeast. 2126 Edmondson Avenue commercial building in foreground.
Credit: Renee Bieretz, photographer, September 2021



Photo 5: Truck garage adjacent to 2150 Harlem Avenue, to be acquired and maintained. View looking east.
Credit: Nancy Zerbe, photographer, September 2021

Attachment B:

Alignment as Depicted in the October 2015 *B&P Tunnel Project, Baltimore, Maryland Architectural Historic Properties Effects Assessment Report*

