

# Baltimore and Potomac Tunnel Project

## Technical Memorandum



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**TO:** Elizabeth Hughes, Maryland Historical Trust  
**FROM:** Michael Johnsen, Federal Railroad Administration  
**SUBJECT:** Section 106 Update  
**DATE:** July 28, 2016

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### I. RECENT SECTION 106 ACTIVITY

The Federal Railroad Administration's (FRA's) last submittal to the Maryland Historical Trust (MHT) and additional consulting parties on October 13, 2015, the *Architectural Historic Properties Effects Assessment Report*, concluded that the Baltimore and Potomac (B&P) Tunnel Project would have an adverse effect on historic properties. FRA met with consulting parties on October 29, 2015 to discuss the report's findings, and in a letter dated November 20, 2015, MHT concurred with the adverse effect determination.

FRA has continued to consult with MHT and additional consulting parties to resolve the adverse effect by developing and evaluating alternatives or modifications to the B&P Tunnel Project that could avoid, minimize, or mitigate adverse effects on historic properties (36 CFR Part 800.6(a)). Such discussions took place at consulting party meetings on March 23 and May 20, 2016. FRA is developing a Programmatic Agreement (PA) that includes stipulations to resolve adverse effects, as well as outlines the procedures for conducting the future identification, evaluation and effects assessment for archeological resources (36 CFR Parts 800.4(b)(2) and 800.5(a)(3)).

On April 6, 2016, FRA notified the Advisory Council on Historic Preservation (ACHP) of the adverse effect finding, provided the required documentation (36 CFR Part 800.11(e)), and invited ACHP to participate in consultation due to the preparation of the PA. In a response letter dated June 7, 2016, ACHP exercised its option not to participate in consultation at this time (36 CFR Part 800.6(a)(1)).

### II. PROJECT UPDATES

#### Preferred Alternative: Alternative 3B

Through development of the Environmental Impact Statement (EIS) that is being prepared in accordance with the National Environmental Policy Act (NEPA), FRA selected Alternative 3B as the Preferred Alternative for the B&P Tunnel Project in April 2016 (see **Attachment A: Overview Map**). Alternatives 3A and 3C were still under consideration when the Section 106 effects assessment for historic architectural properties was completed in October 2015. Since the release of the Draft EIS (DEIS) in December 2015, Alternative 3B was revised in response to public and consulting parties' comments to minimize impacts to the community and effects to historic properties.

Alternative 3B in the north portal area is unchanged from Alternative 3B in the DEIS (see **Attachment A: North Portal Vicinity Map**). The following two potential intermediate ventilation plant locations are currently under consideration on the north side of W. North Avenue (see **Attachment A: Potential Intermediate Vent Plant Sites Map** and **Attachment B: Photographs 1-6**): 1) Madison Park North Apartments (850 W. North Avenue) to the east and 2) three commercial buildings and a parking lot (900-

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908 and 910 W. North Avenue) and the Madison Park Medical Center (920-940 W. North Avenue) to the west. The consulting parties' strong support for these potential locations helped in their selection for the intermediate ventilation plant. While the commercial buildings and medical center properties were originally individually considered for the ventilation plant, further studies determined they are each not large enough to support the facility. The location originally proposed for the intermediate ventilation plant location at the Whitelock Avenue community garden is no longer under consideration based on consulting parties and public input.

Horizontal and vertical alignments of both the track and tunnel were shifted in the south portal area (see **Attachment A: South Portal Vicinity Map**). The track spacing in the south portal area was narrowed, and required surface right-of-way was decreased from 17.1 acres to 12.0 acres. The number of surface parcels impacted decreased from 100 to 88 and the number of residential building displacements decreased from 46 to 22; this avoided displacements of contributing elements to historic districts. Alternative 3B was also revised to avoid demolishing the main building on the Atlas Safe Deposit and Storage Company Warehouse Complex property. However, the revision resulted in the loss of rowhouse contributing elements that had not been affected during the DEIS. In addition, a retaining wall and modifications to the front yards of approximately 13 rowhouses fronting West Franklin Street may be required.

### III. UPDATED AREA OF POTENTIAL EFFECTS FOR HISTORIC ARCHITECTURAL PROPERTIES

The historic architectural area of potential effects (APE) has been updated to take into account Alternative 3B as the Preferred Alternative (see **Attachment A Maps**). The APE justification remains essentially the same as the one previously delineated in the project's *Architectural Historic Properties Survey* (October 2015). Because most construction activities along the proposed tunnel route would be well-beneath the ground surface, with little to no potential for effects to historic properties (including vibratory effects), this area was not included within the updated APE. The historic architectural APE was delineated as a 200-foot radius around the outer boundaries of the north and south portal areas. Some of the south portal limits of disturbance are within the right-of-way of existing roadways, and in some cases, the project is associated with bridges. Due to the temporary nature of the roadway right-of-way work, the APE in these areas is defined as a 100-foot radius from the limits of disturbance. The exceptions to these APE limits are at the extreme ends of the project area where project activities are confined to track work within the existing railroad right-of-way. The initial 100-foot radius APE around the intermediate ventilation plant's potential location was extended to a 200-foot radius once specific potential sites were selected, to better account for potential visual effects on historic properties.

### IV. UPDATED IDENTIFICATION OF HISTORIC ARCHITECTURAL PROPERTIES

Supporting references for this section are provided in **Attachment A** for the updated maps and **Attachment C** for the updated table of historic properties within the historic architectural APE.

#### North Portal

Baltimore and Potomac Railroad/Philadelphia, Baltimore and Washington Railroad (a.k.a. Philadelphia, Wilmington and Baltimore Railroad) (MIHP# B-5164): The historic property's northern boundary was redrawn along parcel lines, more in keeping with the written boundary description from the MHT Determination of Eligibility (DOE) Form (May 1, 2012) and consistent with the current delineation of the

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southern boundary. The clarified boundary does not change the overall effects assessment to this historic property.

Union Railroad (B-5163): Since its last submittal to MHT on October 13, 2015, FRA identified one additional previously surveyed National Register of Historic Places (NRHP)-eligible property inside the historic architectural APE -- the Union Railroad. The railroad was built under the corporate name of the Union Railroad Company of Baltimore. Based on a DOE Form, the Union Railroad received an opinion of eligibility from MHT on March 8, 2011 under Criterion A in the areas of transportation, industry, commerce, and community planning and development for its contribution to the development of industry and commerce in Baltimore, as well as a catalyst for increased settlement of the city in the late-nineteenth century. The historic property is also significant for its role in connecting the B&P Railroad with the Philadelphia, Wilmington and Baltimore Railroad, providing a continuous all-rail line between Philadelphia and Washington, DC for both passenger and freight service. The Union Railroad is also eligible under Criterion C for its engineering merit, particularly the Union Tunnel and many bridges, and as a significant and distinguishable entity.

The line originally extended from a connection with the Northern Central Railroad at Guilford Avenue to the Canton area of Baltimore City with a short branch connection (unevaluated) with the Philadelphia, Wilmington and Baltimore Railroad at Bay View. The identified boundary of the historic property extends from the north portal of the existing B&P Railroad tunnel at North Avenue to Boston Street, including a short segment of the former Northern Central Railroad between the B&P Railroad tunnel and Guilford Avenue. Previously identified contributing elements to the Union Railroad include the NRHP-listed Pennsylvania Station (B-3727), the Union Tunnel, tracks, the roadbed, buildings, retaining walls, interlocking towers, signs, catenary system, and 1930s signal system.

Some uncertainty exists over the exact boundary location for the Union Railroad. As currently defined, it overlaps and shares the same contributing elements as the previously identified B&P Railroad/Philadelphia, Baltimore and Washington Railroad between North Avenue and N. Charles Street. For the purposes of this study, the Union Railroad boundary has been delineated based on both modern parcel lines, and historic railroad valuation and land maps produced by the Interstate Commerce Commission and available at the National Archives.

FRA is currently drafting a Section 106 PA for the B&P Tunnel Project. FRA proposes to add a stipulation to the PA to clarify the many historic property boundaries in the vicinity of Baltimore's Pennsylvania Station which would result in a set of revised boundary recommendations for MHT's consideration and prove useful for future cultural resources investigations. Such a study would also leverage the research already planned for Historic American Buildings Survey/Historic American Engineering Record documentation and interpretive signs planned as part of the proposed PA.

### Intermediate Ventilation Plant

The two potential intermediate ventilation plant locations are located within the Reservoir Hill Historic District boundary (see **Attachment B: Photographs 1-6**):

1. Madison Park North Apartments (east plant location): This early-1970s complex was identified as a non-contributing element in the Reservoir Hill Historic District (B-1379) NRHP nomination form. The

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property is not yet 50 years old and does not possess the potential for exceptional importance (NRHP Criteria Consideration G). Therefore, it is not eligible for listing on the NRHP at this time.

2. Three commercial buildings and parking lot/Madison Park Medical Center (west plant location): The easterly half of the site, a parcel containing three commercial buildings and parking lot, is identified in the Reservoir Hill Historic District NRHP nomination form as a contributing element to the district. Two buildings, consisting of a store block and an adjoining motion picture theater, were designed by architect John Jacob Zinc, AIA and constructed at the same time in 1938. While the storefront building (900-908 W. North Avenue) has had some alterations, it retains enough integrity to continue to qualify as a contributing element to the historic district. The former Linden Theater (910 W. North Avenue), however, has been almost completely demolished and replaced by a circa 1970 building and parking lot. A section of the theater fronting W. North Avenue, comprising the primary entrance and lobby, is all that remains and has been remodeled beyond recognition, with door and window openings filled in, and the marquee removed. Modern awnings extend across the façade and wrap around to the west elevation. Therefore, while the commercial building at 900-908 W. North Avenue on this property continues to contribute to the significance of the Reservoir Hill Historic District, the rest of the property does not, including the surviving portion of the former Linden Theater.

The Madison Park Medical Center, occupying the westerly half of the site, was constructed in 1970, according to Maryland tax assessor records. It was identified in the NRHP nomination form as a non-contributing element of the Reservoir Hill Historic District. The property is not yet 50 years old and also does not possess the potential for exceptional importance (NRHP Criteria Consideration G). Therefore, it is not eligible for listing on the NRHP at this time.

The John Eager Howard School and Recreation Center (B-1379-3), is a newly identified property located within the indirect APE for both potential intermediate ventilation plant locations (see **Attachment D**). Located within the Reservoir Hill Historic District boundary, the 1960s school/recreation center complex is identified as a non-contributing element in the district's NRHP nomination form. However, because the property is now more than 50 years old, FRA's cultural resources consultant completed an MHT DOE Form to evaluate the property individually for NRHP eligibility. Based on this evaluation, FRA recommends the property not eligible for listing in the NRHP.

The Bolton Hill Historic District (B-64) is located to the south and within the indirect APE for both potential intermediate ventilation plant locations. For the purposes of this project, the district-contributing elements within the APE were identified to include the Eutaw Place landscaped median, and two rowhouses at 2100 and 2102 Eutaw Place. Also within the APE is Spicer's Run at Bolton Hill, a townhouse complex built in the late 1990s; this is a non-contributing element of the Bolton Hill Historic District that is less than 50 years and lacks the potential for exceptional importance (NRHP Criteria Consideration G). Therefore, the townhouse complex is not eligible for listing on the NRHP at this time.

With elimination of the Whitelock Avenue community garden as a potential intermediate ventilation plant location, the David Bachrach House (Gertrude Stein House) (B-4098) is no longer within the historic architectural APE.

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### South Portal

With the elimination of Alternative 3C as a build alternative, the Carver Vocational-Technical High School (B-5294) and Western Maryland Railroad, Owings Mill Division (B-5293) are no longer within the historic architectural APE.

### Identified Historic Properties Summary

The following are the historic properties identified within the updated historic architectural APE boundary for Alternative 3B:

1. Baltimore and Ohio Railroad Baltimore Belt Line (B-5287)
2. Baltimore and Ohio Railroad Baltimore Belt Line Bridge over Jones Falls Valley (B-5288)
3. Baltimore and Potomac Railroad (Philadelphia, Baltimore and Washington Railroad) (B-5164)
4. Union Railroad (B-5163)
5. Howard Street Bridge (BC1405) (B-4529)
6. North Avenue Bridge (BC1208) (B-4521)
7. Reservoir Hill Historic District (B-1379)
8. Bolton Hill Historic District (B-64)
9. Midtown Edmondson Historic District (NRHP Nomination Pending)
10. Bridge BC 2410 (Lafayette Avenue over Amtrak) (B-4553)
11. Atlas Safe Deposit and Storage Company Warehouse Complex (B-5188-2)
12. American Ice Company (B-1040)
13. Greater Rosemont Historic District (B-5112)
14. Edmondson Avenue Historic District (B-5187)
15. Ward Baking Company (B-5112-2)
16. Fire Department Engine House No. 36 (B-5112-4)
17. Pennsylvania Railroad Viaduct (B-5064)

## **V. UPDATED EFFECTS ASSESSMENT**

### North Portal

Union Railroad: Project plans call mainly for changes to roadbed, ballast, and track within the existing railroad right-of-way between Baltimore's Pennsylvania Station and the North Avenue bridge, as well as modifications to a small section of the catenary system. New catenary structures are expected to resemble the existing in essential details and be designed in a contextually sensitive manner. The adjustments amount to minor changes within an active railroad corridor, necessary for its continued operation and is fully consistent with its historic use and character-defining features. Overall, the extent of the proposed track work and catenary modifications within the limits of the Union Railroad will not substantially alter the characteristics that qualify the historic property for inclusion in the NRHP. Therefore, FRA has determined that the project would have no adverse effect on the Union Railroad.

### Intermediate Ventilation Plant

**Photographs 7-18 in Attachment B** illustrate the potential effects of the intermediate ventilation plant on historic properties.

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Reservoir Hill Historic District: Constructing the potential intermediate ventilation plant in either of the proposed locations would continue to have direct and indirect effects on the Reservoir Hill Historic District. Selection of the three commercial buildings and parking lot/Madison Park Medical Center site for the intermediate ventilation plant would require demolition of 900-908 W. North Avenue, a contributing element of the Reservoir Hill Historic District. The majority of the other contributing elements within the district are late-nineteenth to early twentieth century rowhouses. The residences located within the APE are mostly three or three and-a-half stories tall with basements. These were the characteristics of the rowhouses that originally stood at the Madison Park Medical Center location (see **Attachment B: Photograph 19**). The proposed intermediate ventilation plant footprint is estimated to be up to 200 feet by 100 feet and approximately 55 feet high. While this massing could be compatible with that of the block of rowhouses that formerly stood at the medical center property, erecting a new, large structure would create physical, visual, atmospheric, and audible changes to the streetscape and surrounding areas of the historic district, with the potential to diminish the district's integrity of design, setting, materials, workmanship, feeling, and association. Therefore, FRA has determined that the project would have an adverse effect on the Reservoir Hill Historic District. However, as stipulated in the PA that is being developed for the project, the design of the new intermediate ventilation plant would follow the Secretary of the Interior's Standards for the Treatment of Historic Properties and be compatible with the historic district.

Bolton Hill Historic District: The proposed intermediate ventilation plant locations would have no direct effect but would have an indirect effect on the Bolton Hill Historic District. Constructing the intermediate ventilation plant would produce no direct physical impact to the historic district, which stands on the other side of a wide corridor, thereby preserving the historic property's integrity of location, design, materials, and workmanship. However, the proposed plant locations are approximately 150 feet from the NRHP-listed historic property and within its visual line of sight. Most notably, the three commercial buildings and parking lot/Madison Park Medical Center site would be within the viewshed of the historic district's three contributing elements located in the APE, the Eutaw Place landscaped median, and rowhouses at 2100 and 2102 Eutaw Place. Although erecting a new, large structure within sight of the historic property has the potential to create visual, atmospheric, and audible changes to the historic property's wider neighborhood setting, the influences of distance and perspective help to minimize or negate visual and audible effects. The district's significance in the areas of architecture, landscape, literature, music, science, and sculpture, would remain unchanged by the new intermediate ventilation plant. The project would not diminish the historic property's feeling as a nineteenth and early-twentieth century residential neighborhood. Therefore, FRA has determined that the project would not have an adverse effect on the Bolton Hill Historic District.

### South Portal

Revised Alternative 3B changes the number of contributing elements experiencing a direct adverse effect within four historic districts. Under Alternative 3B (DEIS), there was no adverse effect to the Edmondson Avenue Historic District. However, FRA has determined that the project would now have an adverse effect on this historic district due to the proposed demolition of two contributing rowhouses. The displacement of these same rowhouses has also increased the number of contributing elements demolished within the Greater Rosemont Historic District. While the overall number of demolished contributing elements has become significantly less, FRA has determined that there would continue to be an adverse effect to the Midtown Edmondson Historic District, Atlas Safe Deposit and Storage

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Company Warehouse Complex and Greater Rosemont Historic District, and there would now also be an adverse effect on the Edmondson Avenue Historic District. The table below summarizes the changes in impacts between Alternative 3B (DEIS) and the revised Alternative 3B.

Historic District Name	Contributing Elements Demolished*	
	Alternative 3B (DEIS)	Alternative 3B (Revised)
Midtown Edmondson Historic District	73	29
Atlas Safe Deposit and Storage Company Warehouse Complex	2	1
Greater Rosemont Historic District	3	5
Edmondson Avenue Historic District	0	2

\* Some contributing elements are counted more than once due to overlapping historic districts

### Effects Assessment Summary

The project continues to have an adverse effect on historic properties, as summarized below:

#	Historic Property with an Adverse Effect	APE Location	Adverse Effect Assessment
1	Baltimore and Ohio Railroad Baltimore Belt Line	North Portal	Limestone pier of the bridge over Jones Falls Valley (see directly below) demolished and/or relocated
2	Baltimore and Ohio Railroad Baltimore Belt Line Bridge over Jones Falls Valley	North Portal	Limestone pier demolished and/or relocated
3	Baltimore and Potomac Railroad (Philadelphia, Baltimore and Washington Railroad)	North Portal and South Portal	Railroad catenary lines removed; railroad track bed alignments widened; B&P Railroad Edmondson Avenue Station, W. Mulberry Street Bridge, and W. Franklin Street Bridge demolished; and N. Warwick Avenue Bridge possibly altered
4	Reservoir Hill Historic District	Intermediate Ventilation Plant	Physical, visual, atmospheric, and audible changes to the streetscape and surrounding area, with the potential to diminish integrity
5	Midtown Edmondson Historic District	South Portal	<i>27 buildings demolished:</i> including the rear building at the Atlas Safe Deposit and Storage Company Warehouse Complex and the lumber warehouse on Mosher Street <i>2 bridges altered:</i> Bridge BC 2410 (see directly below for details) and the Edmondson Avenue Bridge over Amtrak

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#	Historic Property with an Adverse Effect	APE Location	Adverse Effect Assessment
6	Bridge BC 2410 (Lafayette Avenue over Amtrak)	South Portal	Bridge superstructure elevated and substructure potentially modified
7	Atlas Safe Deposit and Storage Company Warehouse Complex	South Portal	Rear warehouse building demolished
8	Greater Rosemont Historic District	South Portal	5 buildings demolished, including the B&P Railroad Edmondson Avenue Station and rowhouses
9	Edmondson Avenue Historic District	South Portal	2 district-contributing rowhouses demolished



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## **ATTACHMENT A**

**Updated Historic Architectural Area of Potential Effects and  
Identification of Historic Properties Maps**

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## **ATTACHMENT B**

**Potential Intermediate Ventilation Plant Area Photographs**

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## **ATTACHMENT C**

**Updated Table of Historic Properties Within the Historic Architectural  
Area of Potential Effects**

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## **ATTACHMENT D**

**Determination of Eligibility Form for the  
John Eager Howard School and Recreation Center**