BALTIMORE AND POTOMAC (B&P) TUNNEL PROJECT
SECTION 106 PROJECT CHANGE TRANSMITTAL #7
Edmondson Avenue Bridge Design Change

TO: Section 106 Programmatic Agreement Signatories and other Consulting Parties, B&P Tunnel Project

FROM: Nancy L. Zerbe, ARCH^2, Inc., a subcontractor to Parsons Brinckerhoff/Parsons JV, on behalf of Amtrak

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DATE: August 19, 2025

SUBJECT: Notification of Project Change for the Edmondson Avenue Bridge Design and Context-Sensitive Design Analysis of 90% Plans

In accordance with the Programmatic Agreement (PA) for the Baltimore and Potomac (B&P) Tunnel Project (Project), executed under Section 106 of the National Historic Preservation Act (Section 106), Amtrak is providing to Signatories and other Consulting Parties this seventh 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 Project. This Project Change only applies to historic architecture; PA Stipulation VII.C provides that "Project modifications with the potential to impact archaeological deposits would be addressed pursuant to Stipulation VI."

For signatories and concurring parties, Amtrak is also asking for your comments on the context-sensitive design of the bridge in accordance with Stipulation V.C.5 of the PA. As reflected in the attached design material, Amtrak has progressed design of the new bridge carrying Edmondson Avenue over the Northeast Corridor to the 90% design phase. In terms of context-sensitive design, the 90% plans are primarily consistent with the 60% design plans and analysis distributed to the signatories and concurring parties on November 1, 2024.

Description of Project Change and Need
This Project Change addresses a design change for the Edmondson Avenue Bridge over the Northeast Corridor (NEC) (see **Attachment A, Slides 2-4**). As described in the *Context-Sensitive Design Treatments* report (created in 2019/updated in 2023), the existing concrete and steel

girder bridge was to be replaced by a low-level steel deck girder bridge that would be context sensitive to the many early twentieth century concrete bridges located along the historic B&P Railroad/Philadelphia, Baltimore and Washington Railroad (B-5164). As a result of the subsequent design process, however, Amtrak proposes to construct a through-type steel arch bridge at this location. This proposal is supported by additional historic research that identified bridge precedents along the rail line as well as on an analysis of functional benefits (see discussion below under Effects Assessment).

Construction of an arch bridge will require closing Edmondson Avenue to pedestrian traffic for approximately two years. Amtrak is therefore proposing to build a temporary pedestrian bridge to maintain pedestrian connectivity during the bridge construction. The temporary free-standing pedestrian bridge will be located directly north of Edmondson Avenue and will connect to the sidewalks along Edmondson Avenue on either side of the NEC. The prefabricated modular steel bridge will be designed, fabricated, and detailed by the project contractor in accordance with project specifications. Construction of the pedestrian bridge will require additional areas for pedestrian access and for construction-related activities.

Section 106 Analysis
Because all affected properties are already included in the boundaries of the Project's Area of Potential Effects-Architectural History (APE), the APE does not need to be expanded. In addition, all affected properties have already been evaluated for historic significance; therefore, no additional identification of historic properties is needed.

Historic Properties' Description and Significance

The current Edmondson Avenue Bridge (Baltimore City Bridge BC 2405 and MIHP # B-4552) is located within the boundaries of both the B&P Railroad and the Midtown Edmondson Historic District (see the first two bullet points below). On April 3, 2001, the Maryland Historical Trust (MHT), serving as the Maryland State Historic Preservation Officer, concurred with the Maryland State Highway Administration's Historic Bridge Inventory that the bridge is not eligible for inclusion in the National Register of Historic Places (NRHP), either as an individual historic property or as a contributing element of the rail line or the historic district. Although the bridge retains early stone abutments, it was extensively modified in 1985 with a replacement superstructure, including new steel girders, deck, roadway surface, joints, and parapets. Therefore, the bridge no longer retains its original design integrity, and the integrity of materials and workmanship of its stone abutments has been diminished.

The following historic properties are located within the APE for the current Project Change:

- The historic B&P Railroad/Philadelphia, Baltimore and Washington Railroad (MIHP # B-5164) is eligible for inclusion in the NRHP under Criterion A as a critical component of a line that (1) established a reliable connection between Baltimore and Washington, D.C., and ultimately to Philadelphia and New York, and (2) had a major impact on the social, economic, commercial, industrial, and agricultural development of Baltimore and southern Maryland. The rail line's period of significance spans from 1872, when the first

rail segment opened, until 1976, the last year that the Philadelphia, Baltimore and Washington Railroad operated.

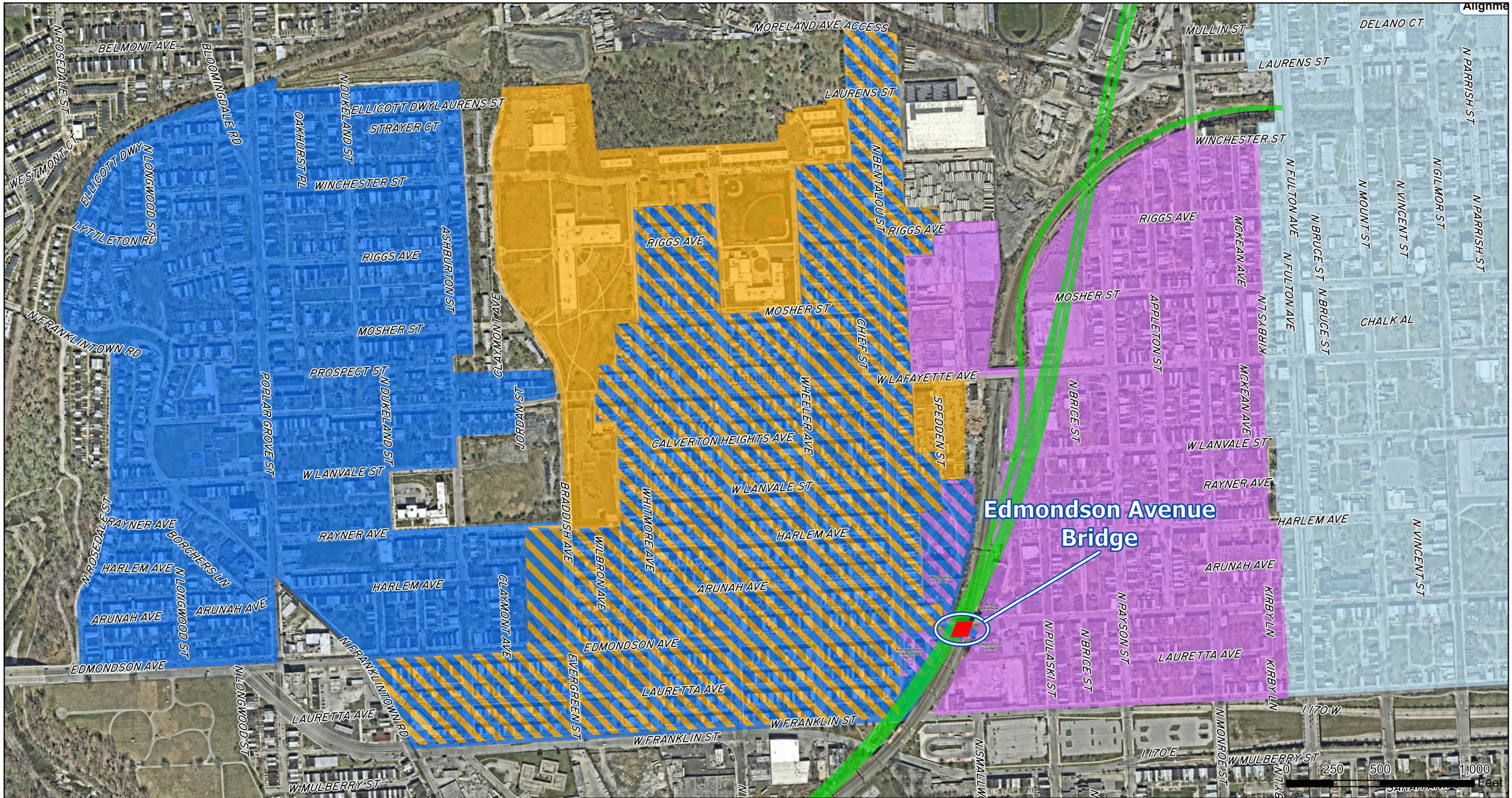
- The Midtown Edmondson Historic District (MIHP # B-5118), primarily located east of the NEC (see **Figures 1 & 2**), consists of a mix of rowhouses, warehouses, and commercial buildings constructed between the 1880s and the mid-twentieth century. The historic district was listed in the NRHP in 2025 under Criterion A for its association with the growth of West Baltimore and its post-WWII racial transition, and under Criterion C as a representative example of a late-nineteenth century and early-twentieth century neighborhood with a diverse range of rowhouse designs. The district's period of significance is from 1888 to 1965.

- The NRHP-eligible Greater Rosemont Historic District (MIHP # B-5112) is located west of the rail line and includes both the Ward Baking Company (MIHP # B-5112-2) at 2140 Edmondson Avenue, and Fire Department Engine House No. 36 (MIHP # B-5112-4) at 2249 Edmondson Avenue. The large majority of the historic district is coincident with the Edmondson Avenue Historic District (MIHP # B-5187), encompassing the neighborhoods of Evergreen Lawn, Bridgeview/Greenlawn, and Rosemont Homeowners/Tenants, and sections of Midtown-Edmondson.

- The NRHP-listed Edmondson Avenue Historic District (MIHP # B-5187) is to a great extent coincident with the NRHP-eligible Greater Rosemont Historic District (MIHP # B-5112), with a key distinction that the easternmost boundary of the historic district in the program area is N. Bentalou Street, thereby excluding the Ward Baking Company and Fire Department Engine House No. 36. The historic district is predominantly residential in character with the exception of several early twentieth century religious buildings, a handful of commercial structures, a number of industrial buildings, and a large section of late twentieth century development at the northern edge of the district.

- Fire Department Engine House No. 36 (MIHP # B-5112-4), 2249 Edmondson Avenue (southeast corner of Edmondson Avenue and N. Bentalou Street), individually eligible for inclusion in the NRHP and a contributing element of the NRHP-listed Midtown Edmondson Historic District and the NRHP-eligible Greater Rosemont Historic District. The 1910 brick Tudor Revival style firehouse has two entrances off Edmondson Avenue: a central garage door at the building façade for the fire equipment and an adjoining driveway flanked by a pair of brick piers with large concrete ball finials.

- Ward Baking Company (MIHP # B-5112-2) has the official address of 2205 W. Lanvale Street, but it is owned by an entity known as 2140 Edmondson Avenue LLC, reflecting the address of its primary entrance at the northwest corner of the Edmondson Avenue bridge. The Ward Baking Company is individually eligible for inclusion in the NRHP and a contributing element of the NRHP-listed Midtown Edmondson Historic District



Frederick Douglass Tunnel Program
Context Sensitive Design: Edmondson Ave Bridge

- Edmondson Avenue Historic District
- Greater Rosemont Historic District
- Midtown-Edmondson Historic District
- Old West Baltimore Historic District
- Proposed Alignment

NORTH

Frederick Douglass Tunnel
B&P TUNNEL REPLACEMENT

U.S. Department of Transportation
Federal Railroad Administration

Figure 1: Overview

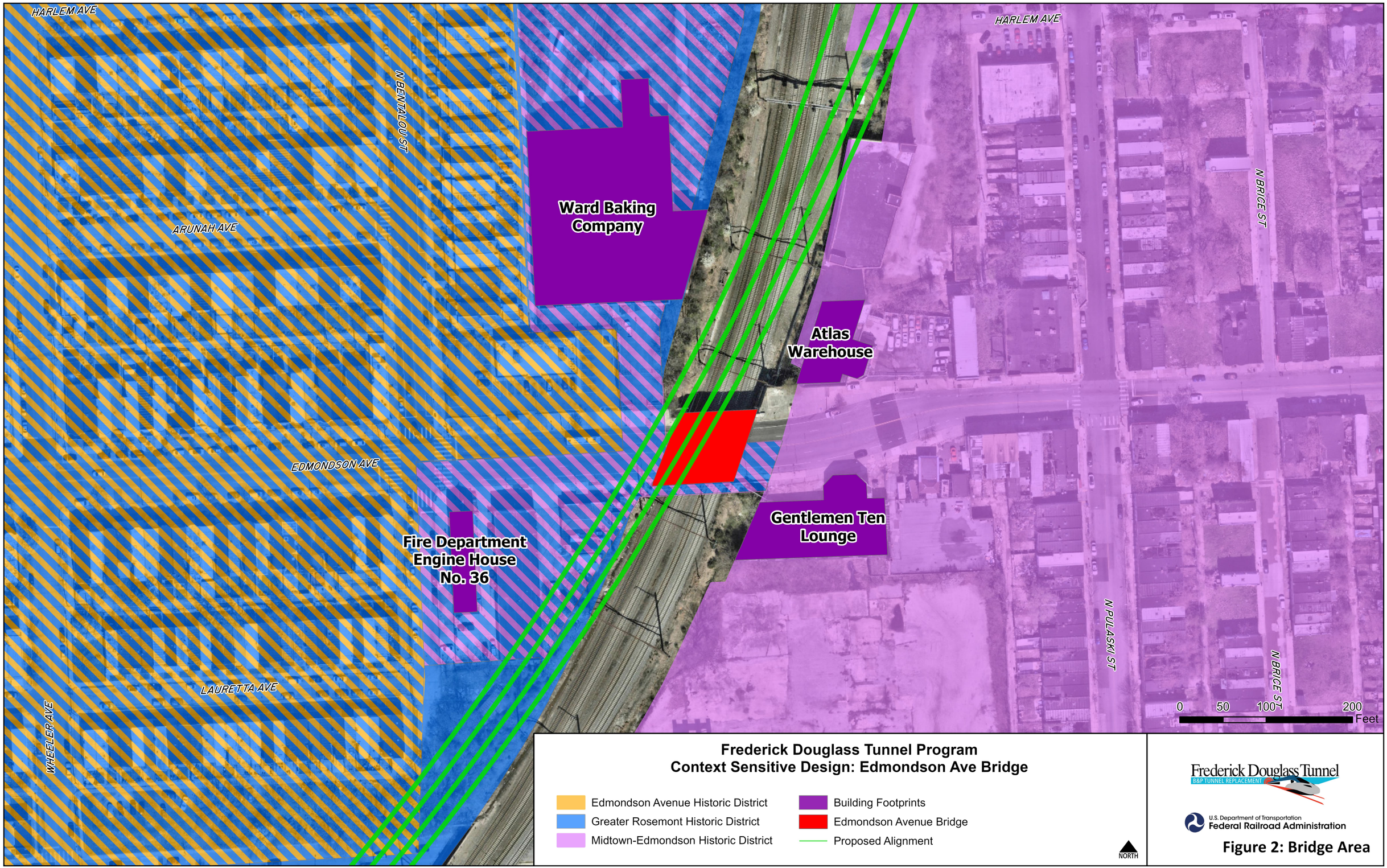


Figure 2: Bridge Area

and the NRHP-eligible Greater Rosemont Historic District. The MIHP boundary for the Ward Baking Company is bounded by Amtrak's Northeast Corridor railroad tracks to the east, Edmondson Avenue to the south, North Bentalou Street to the west, and West Lanvale Street to the north. The 2.9-acre property includes the following features that contribute to the property's historic significance: a main three-story factory building built in 1925-1927, and a one-story auto repair shop building built c.1927. The three-story building divides the property between the small parking lot on the south side (accessed via a driveway from Edmondson Avenue and an alley from N. Bentalou Street) and the larger portion of the property, including multiple loading docks and the auto repair shop, on the north side of the property (accessed from W. Lanvale Street). The auto repair shop building is not within the APE for this Project Change.

The small parking lot on the south side of the main building is enclosed by chain-link fence supported by brick piers, some of which still have a granite cap. A double-leaf, chain-link gate, flanked by brick piers and brick planting beds, marks the Edmondson Avenue entrance to the property, channeling access through an opening approximately one lane wide. To assess whether or not the piers contribute to the Ward Baking Company's significance, Amtrak conducted research to determine the piers' date of construction. Amtrak has concluded that these piers post-date the property's period of significance and therefore do not contribute to the property's significance. According to the NRHP nomination for the Midtown Edmondson Historic District, the district's period of significance is 1888-1965. Amtrak has identified the individual property's period of significance as extending from 1926 to 1974, the years that the Ward Baking Company actively utilized this site. Aerial photography taken in 1989, 15 years after the period of significance (see **Figure 3**), indicate that the driveway that leads to the Ward Baking Company was not yet defined by the brick piers.

Figure 3: 1989 Aerial Photograph, Historic Aerials by Netronline, historicaerials.com.

There was a significant fire at the main Ward Baking Company building on May 12, 2025, and the building's future is still being determined. However, currently most of the building, including its primary elevations, is still standing. The c. 1927 auto repair shop building was not physically affected by the fire and is still standing. Therefore, the Ward Baking Property retains sufficient integrity to be both an individual historic property and a contributing feature of the Midtown Edmondson Historic District and the Greater Rosemont Historic District.

- Atlas Safe Deposit and Storage Warehouse Complex (MIHP # B-5118-2) warehouse building, 2126 Edmondson Avenue (northeast corner of the bridge), constructed in 1925 and individually eligible for inclusion in the NRHP and a contributing element of the NRHP-listed Midtown Edmondson Historic District.

Assessment of Effect/Adverse Effect

The following analysis assesses the effects of the Project Change in the bridge design on the historic properties within the APE:

- When the Project's Final Environmental Impact Statement (FEIS) and Record of Decision (ROD) were issued in 2017, the project plans included the replacement of the **B&P Railroad/Philadelphia, Baltimore and Washington Railroad**'s bridge carrying Edmondson Avenue over the rail line with a low-level steel deck girder bridge that would be context sensitive to the many early twentieth century concrete bridges located along the historic B&P Railroad/Philadelphia, Baltimore and Washington Railroad.

  Subsequently, additional historic research identified precedents for both steel truss and arch bridges along the Pennsylvania Railroad (see **Attachment A, Slide 5** "Understanding Context-Sensitive Design"). In the early twentieth century, several steel arch bridges were built over the Northeast Corridor (then the Pennsylvania Railroad) in the area of Jones Falls within Baltimore, including the Howard Street and Guilford Avenue arch bridges. In 1893, the City of Baltimore authorized $30,000 to move a truss bridge over Jones Falls to be used as part of a new bridge to carry Edmondson Avenue over the Baltimore and Potomac Railroad. The new through-type steel truss bridge, constructed in 1894, was depicted in the 1924 plans for its replacement bridge (see **Figure 4** as well as in a 1913 photograph on file with the City of Baltimore Enoch Pratt Free Library (see **Figure 5**).

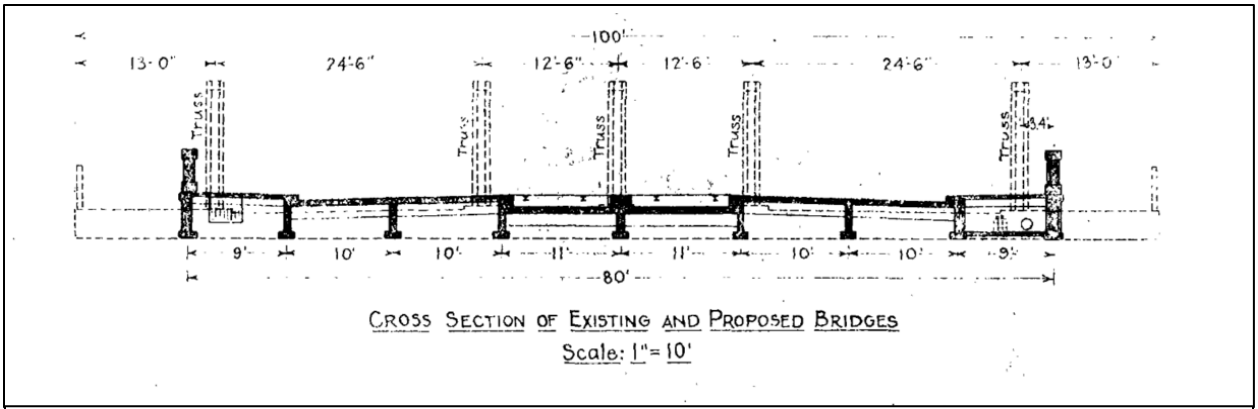


Figure 4: 1924 Bridge Plan Sheet Showing the Cross Section of the 1894 Truss Bridge superimposed on the 1924 plan.

Figure 5: 1913 Photograph of the Edmondson Avenue Truss Bridge, on file at the Enoch Pratt Free Public Library.

Based on the precedents for both steel truss and arch bridges along the historic rail line, Amtrak decided to construct a steel arch superstructure. This bridge type is compatible with historic bridges used along the Pennsylvania Railroad, and reflects the many historic steel

power, communication, and signal structures located along the rail line (see **Attachment A, Slides 6 and 7** "Proposed Edmondson Avenue Bridge"). To avoid creating a false historical impression, the new bridge will not use decorative detailing, but instead, it will reflect its modern structural elements.

Further contributing to the design selection, the utilization of a steel arch bridge design will provide the following functional benefits (see **Attachment A, Slide 8** "Benefits/Design Features"):

- Aid the scheduling flexibility of both demolition and construction. The proposed overhead steel arch support structure allows for a span long enough to extend over both the existing and new realigned track paths. As a result, the bridge and track demolition/construction can occur independently from each other. Therefore, the duration of construction for this bridge replacement can be reduced from 3.5 years (with a shorter deck girder bridge) to approximately 2 years (with a longer arch bridge).
- Provide greater track clearance below the bridge. The overhead steel arch support of the span allows the overall depth of the bridge below the roadway to be approximately 4 feet, as opposed to approximately 8 feet for a standard deck girder design of a similar span length.

The use of an arch bridge at this location is context sensitive and therefore avoids an additional adverse effect. In accordance with the *Secretary of the Interior's Standards* and the recommendations in *Context Sensitive Design Treatments*, the proposed new bridge will reflect its modern structural elements rather than create a false historical impression. In addition, consistent with *Context-Sensitive Design Treatments* and the previous bridge design, the stone from the demolished substructure of the existing bridge will be made available, wherever feasible, for possible reuse elsewhere along the corridor.

- The Project Change will visually and atmospherically affect the **Midtown Edmondson Historic District.**

  - Due to the urban nature of the bridge location, a pedestrian walkway will be incorporated into each side of the bridge, as recommended in *Context-Sensitive Design Treatments* and incorporated into the previous bridge design. A sidewalk will be on the south side, and a shared-use path will be on the north side.
  - The proposed Edmondson Avenue roadway will be approximately 1'-4" higher than the existing roadway at the Atlas Safe Deposit and Storage Warehouse Complex and approximately 2'-8" higher on the west side of the bridge (see **Attachment A, Slide 9** "Existing and Proposed Edmondson Avenue Bridge"), and at the highest point of the roadway, only approximately 6" higher than the original design approved in the ROD. This elevation change does not constitute an additional adverse effect. The arch frame of the new bridge will be higher than the current bridge structure and the previous bridge design; however, due to the visually open nature of the arch and the developed nature of

the surrounding area, there will not be an additional visual or atmospheric adverse effect. The design change does not introduce audible changes to the setting.

- Similar to the existing bridge, barrier walls along the outside of the sidewalk are required to protect the public from the railroad below. Amtrak proposes to make the barrier walls transparent to allow greater visibility of the historic district and the MARC rail station from the bridge (see **Attachment A, Slide 10** "Protective Barrier Options at Edmondson Avenue").
- The visual and atmospheric effect of the pedestrian bridge on the Midtown Edmondson Historic District will be temporary because it will only be in place during construction of the permanent road bridge. Also, the pedestrian bridge will not be as high as the permanent bridge. The highest point of the permanent temporary bridge will be at elevation 174.55 feet above sea level, and the highest point of the permanent bridge will be at elevation 213.67 feet above sea level. The temporary steel thru-truss is about 15 feet above the pedestrian way surface; the permanent steel arch is about 40 feet above the roadway surface. Therefore, the pedestrian bridge will not have an adverse effect on the historic district.

The effects of this project change on the Midtown Edmondson Historic District will not be adverse.

- The proposed bridge design will have visual and atmospheric effects on the setting of the **Greater Rosemont Historic District**, which is located west of the bridge and includes two historic properties in close proximity to the bridge, ie., the Ward Baking Company and Fire Department Engine House No. 36 (both discussed below). The new bridge is at the eastern edge of the large historic district and will only have a minor visual and atmospheric effects on the historic district. The effects will not be adverse.

- The proposed bridge design will have visual and atmospheric effects on the setting of the **Edmondson Avenue Historic District**. Because the bridge is located one block east of this historic district, the effects on the historic district will be minor and not adverse.

- There will be no physical effect on the **Atlas Safe Deposit and Storage Company Warehouse Complex**. In addition, the visual and atmospheric effects of the change of bridge type will also not be an adverse effect to this historic property.

- There will be a visual and atmospheric effect on the National Register-eligible **Fire Department Engine House No. 36** at the southeast corner of Edmondson Avenue and N. Bentalou Street. In addition to the visual effect, the proposed bridge design will, for approximately fifteen months during construction, block access to the driveway located immediately to the east of the fire house. Neither the visual and atmospheric effect nor the temporary direct effect constitute an adverse effect.

- The original bridge design included in the ROD eliminated the **Ward Baking Company** property's direct access from Edmondson Avenue. This action constituted an effect, but not an adverse effect. Although the design that was part of the ROD would have necessitated removal of some of the brick piers surrounding the property's Edmondson Avenue parking lot, this effect was not addressed at the time of the ROD. The new bridge design will result in the permanent use of approximately 60% more of the driveway leading from Edmondson Avenue to the Ward Baking Company as well as the taking of additional brick piers to facilitate the construction of the pedestrian bridge and for the contractor's use of additional driveway area for construction activities. Amtrak will also make paving improvements to the alley leading to the Ward Baking Company from Bentalou Street and to parts of the Ward Baking Company property to provide improved access to the property. The additional amount of the Ward Baking Company property required for the project remains a small portion of the overall size of the historic property and will not constitute an additional adverse effect on the historic Ward Baking Company property. The removal of brick piers, which are non-contributing features, will not constitute an adverse effect. The automobile repair shop building at the north end of the Ward Baking Company property (on W. Lanvale Street) is outside of the APE for this Project Change and will not be affected. The visual and atmospheric effects of the change of bridge type will also not be an adverse effect to the Ward Baking Company.

As required in the ROD and recommended in *Context-Sensitive Design Treatments*, Amtrak's design team solicited comments on the bridge design at public meetings in February and September 2024. In addition, the team met with Baltimore city officials and presented the proposed design to them. The responses from both the public and the city have been positive. As part of the public outreach and in the October 2024 context-sensitive design distribution to signatories and concurring parties, Amtrak solicited comments on the bridge's design features including the use of the more transparent barrier over the tracks and the preferred color of the bridge's steel elements (see **Attachment A, Slide 11** "Edmondson Avenue Bridge – Color Options"). MHT concurred with the evaluation; no other comments were received.

The changes described in Project Change #7 do not constitute any additional adverse effects on historic properties.

Request for Comments
In accordance with Stipulation XI (Document Review) of the PA, Amtrak requests that you review and submit 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.

This request is in accordance with:

- Stipulation V.C (Context-Sensitive Design) of the PA for all signatories and concurring parties; and
- Stipulation VII (Project Changes) for all signatories and consulting parties.

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

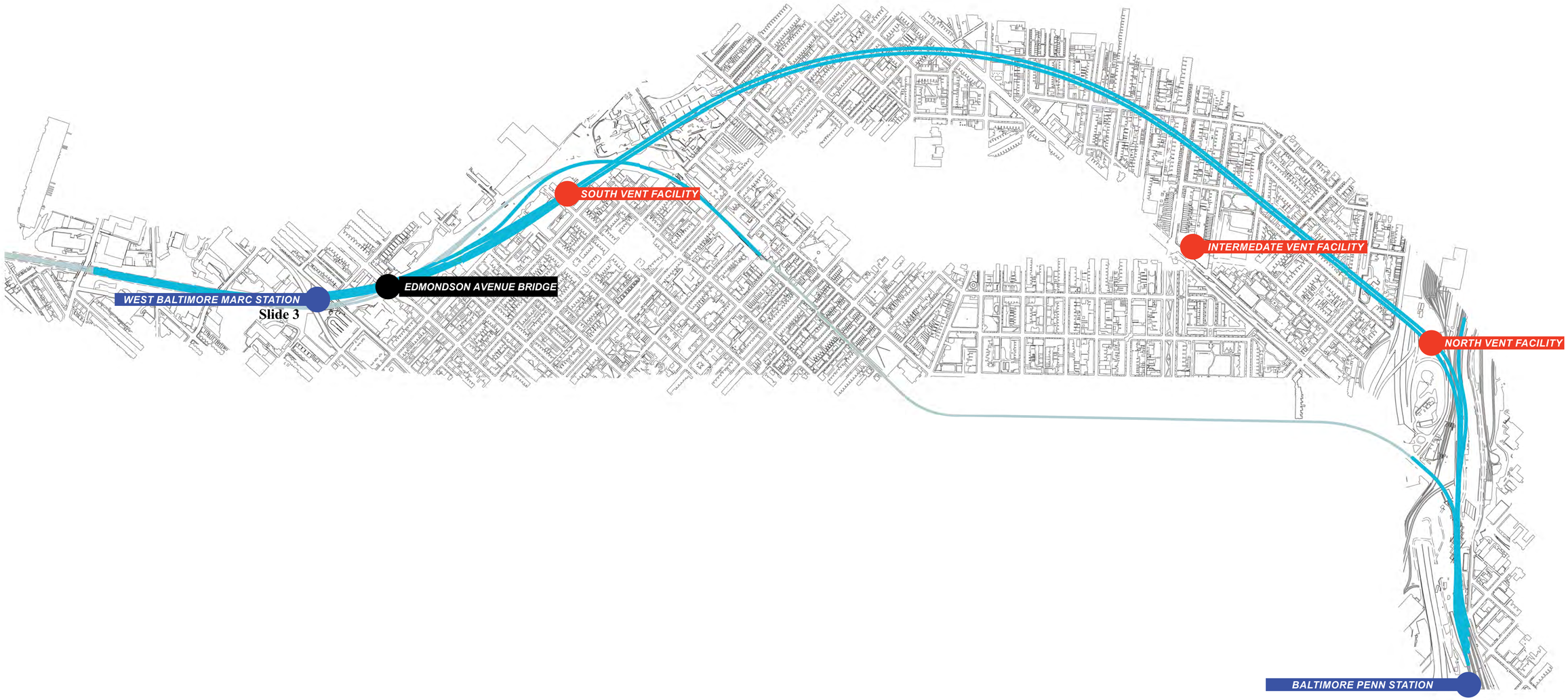
Enclosures:

- Attachment A: Edmondson Avenue Bridge Replacement, Overview
- Attachment B: Edmondson Avenue Bridge Replacement, 90% Design Sheets (limited to signatories and concurring parties with executed Non-Disclosure Agreements)

SECTION 106 PROJECT CHANGE TRANSMITTAL #7: EDMONDSON AVENUE BRIDGE REPLACEMENT

August 2025

Frederick Douglass Tunnel
B&P TUNNEL REPLACEMENT



Slide 3

LEGEND

- MARC STATION LOCATION
- VENT FACILITY LOCATION
- EDMONDSON AVENUE BRIDGE
- NEW TRACK ALIGNMENT

0’ 500’ 1000’ 2000’

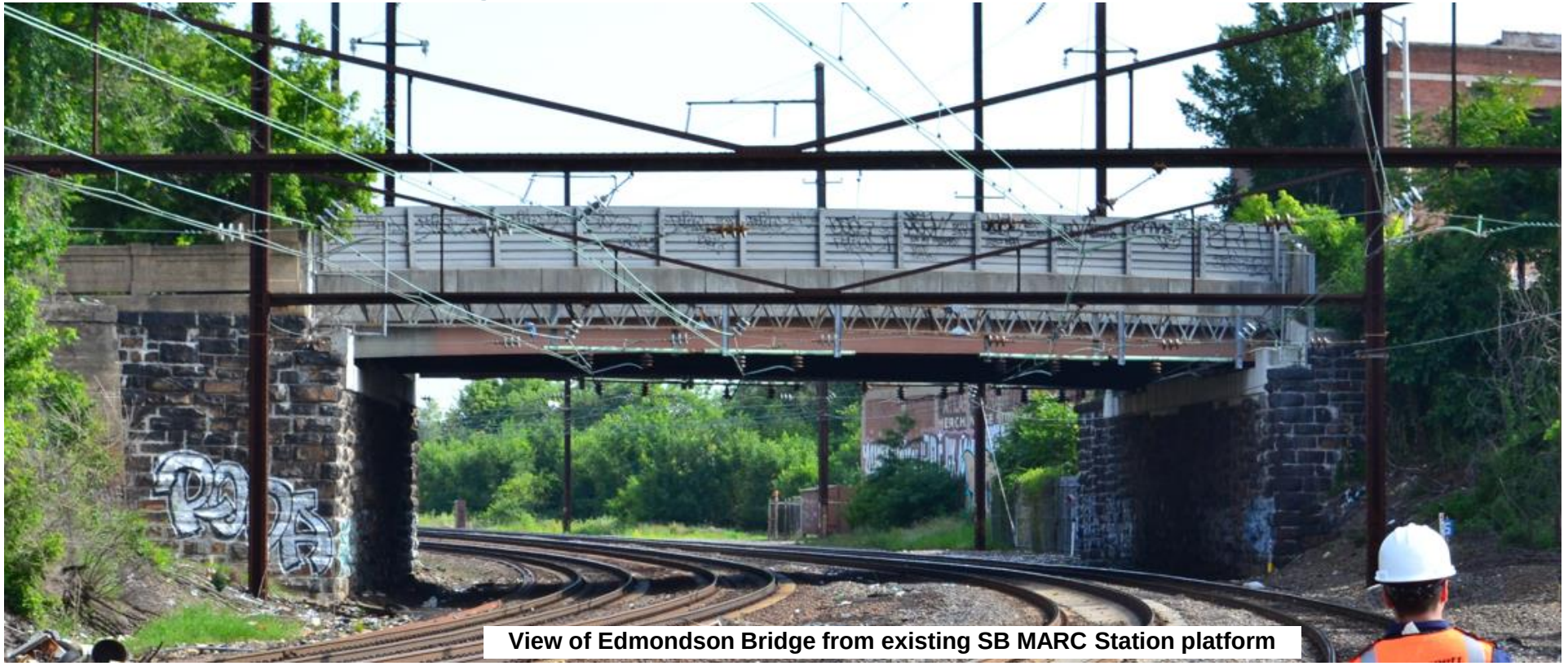
OVERALL PLAN
EDMONDSON AVENUE BRIDGE REPLACEMENT

Slide 2

Frederick Douglass Tunnel
B&P TUNNEL REPLACEMENT

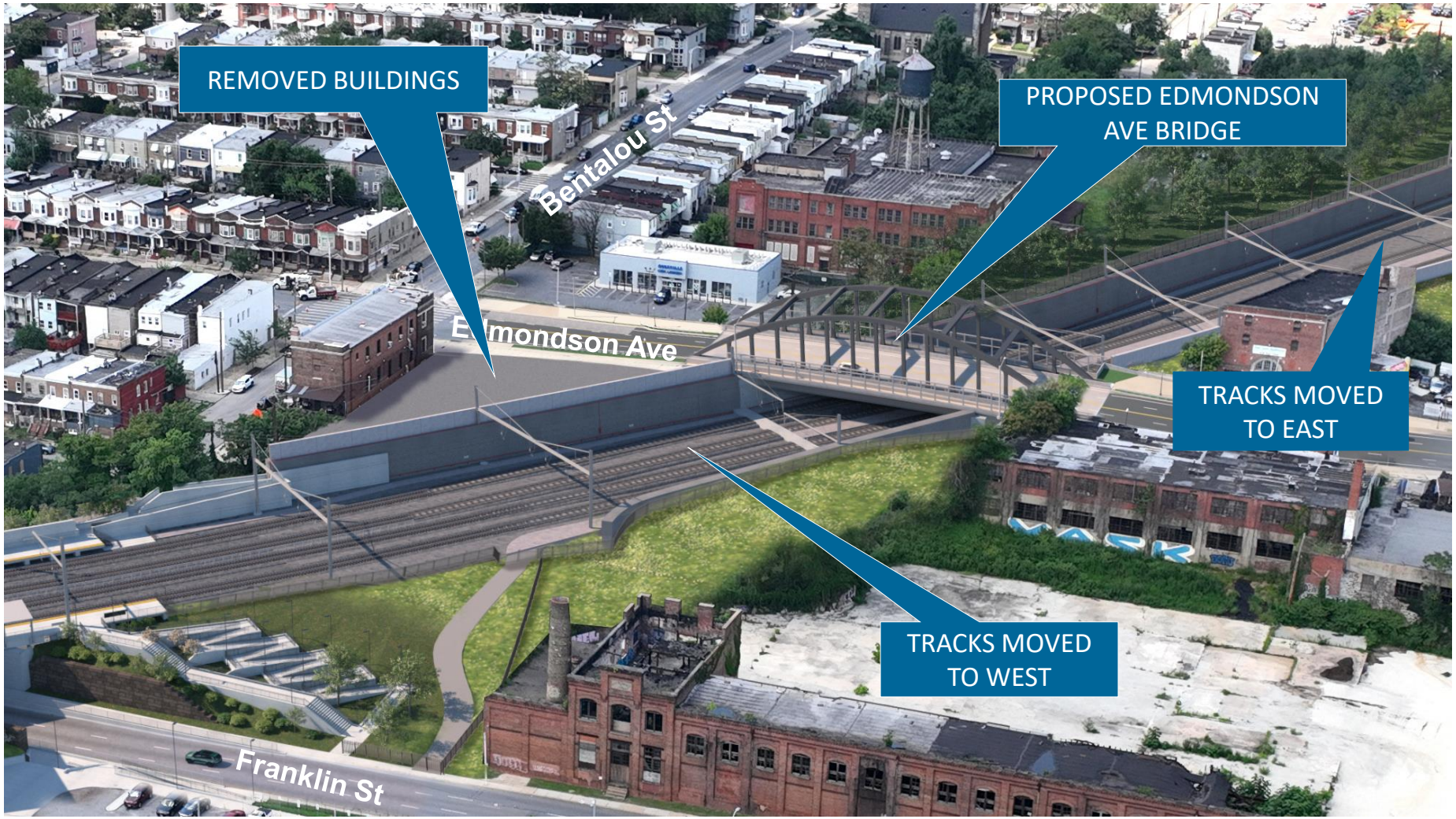
Existing Edmondson Avenue Bridge

- 1895(est) – Original Construction (Overhead truss bridge on stone abutments)
- 1924 – Reconstructed as 2-span bridge
- 1987 – Reconstructed as single span (current condition)
- Proposed New Arch Bridge



View of Edmondson Bridge from existing SB MARC Station platform

Proposed Crossing at Edmondson Ave



HISTORIC STRUCTURES TO REMAIN

Understanding Context Sensitive Design

Edmondson Avenue, crosses a historic rail line and connects two residential / commercial historic districts.

The bridge that carries Edmondson Avenue over the railroad has undergone several changes and no longer reflects the area's significance.

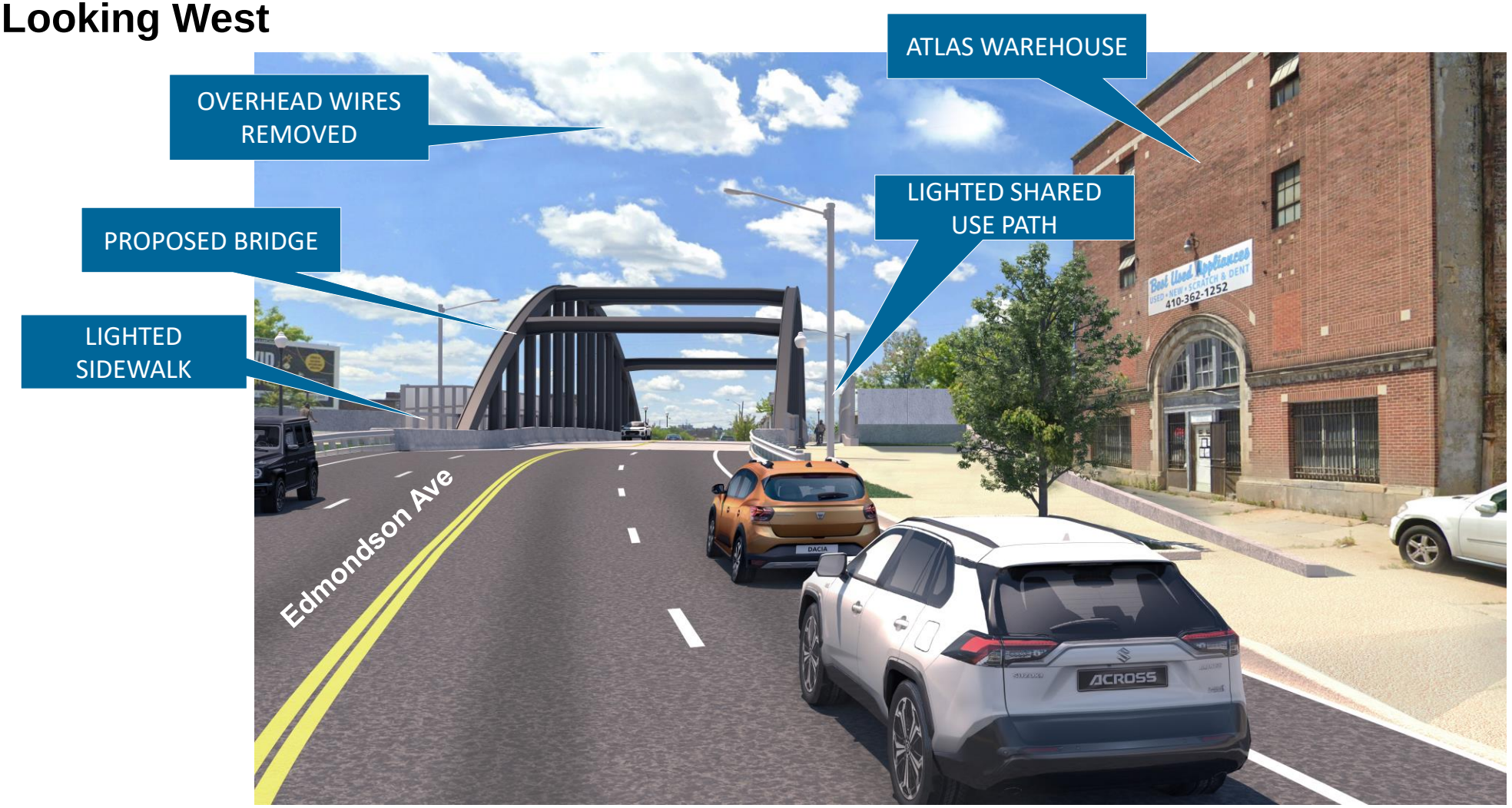
A 19th century overhead truss bridge was replaced in 1924 with a classically-inspired concrete bridge, which was substantially rehabilitated in 1987, leaving only a simple, unadorned non-historic bridge.

Constructing a new arch bridge will:

- Return a prominent style of overhead bridge to an important location for two historic districts; and
- Maintain the mix of bridge types historically built along the B&P Railroad

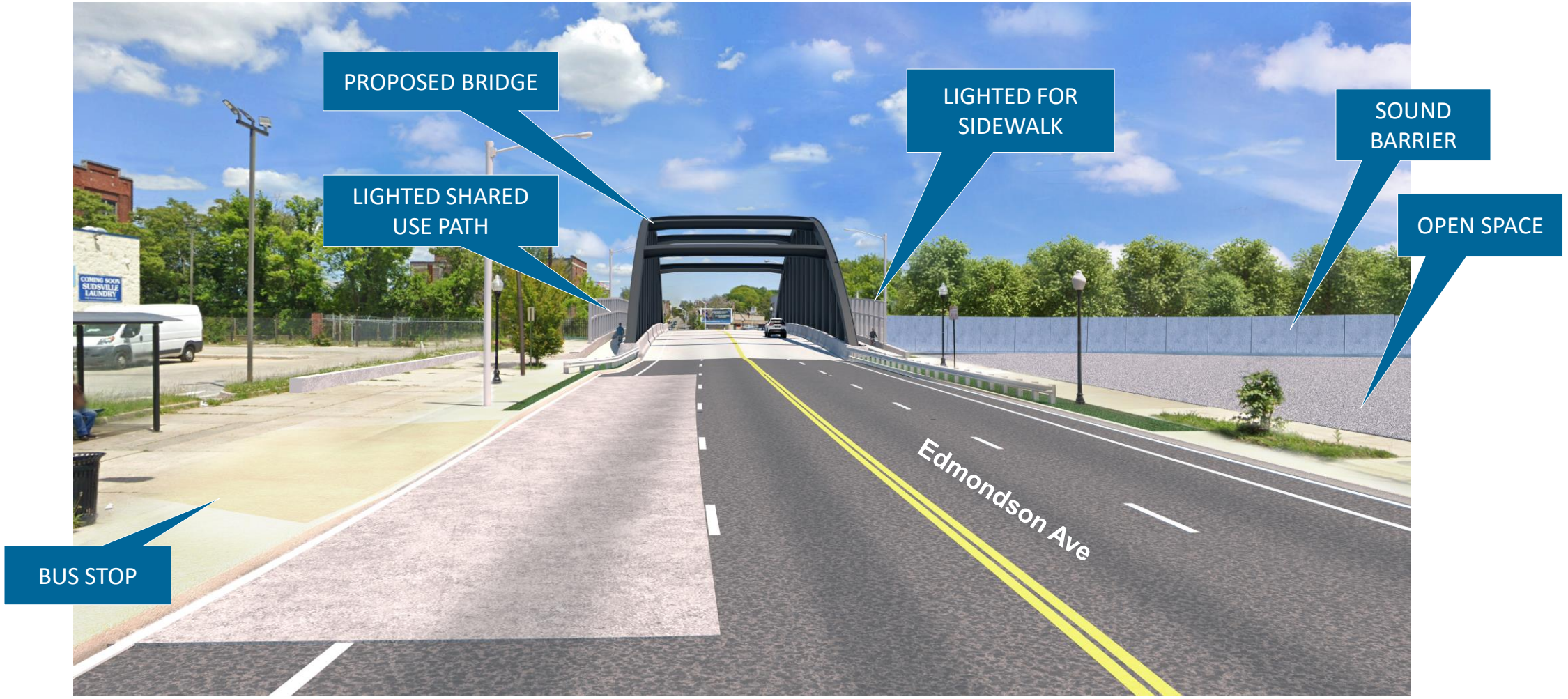
Proposed Edmondson Avenue Bridge

Looking West



Proposed Edmondson Avenue Bridge

Looking East



BENEFITS / DESIGN FEATURES

Existing Bridge

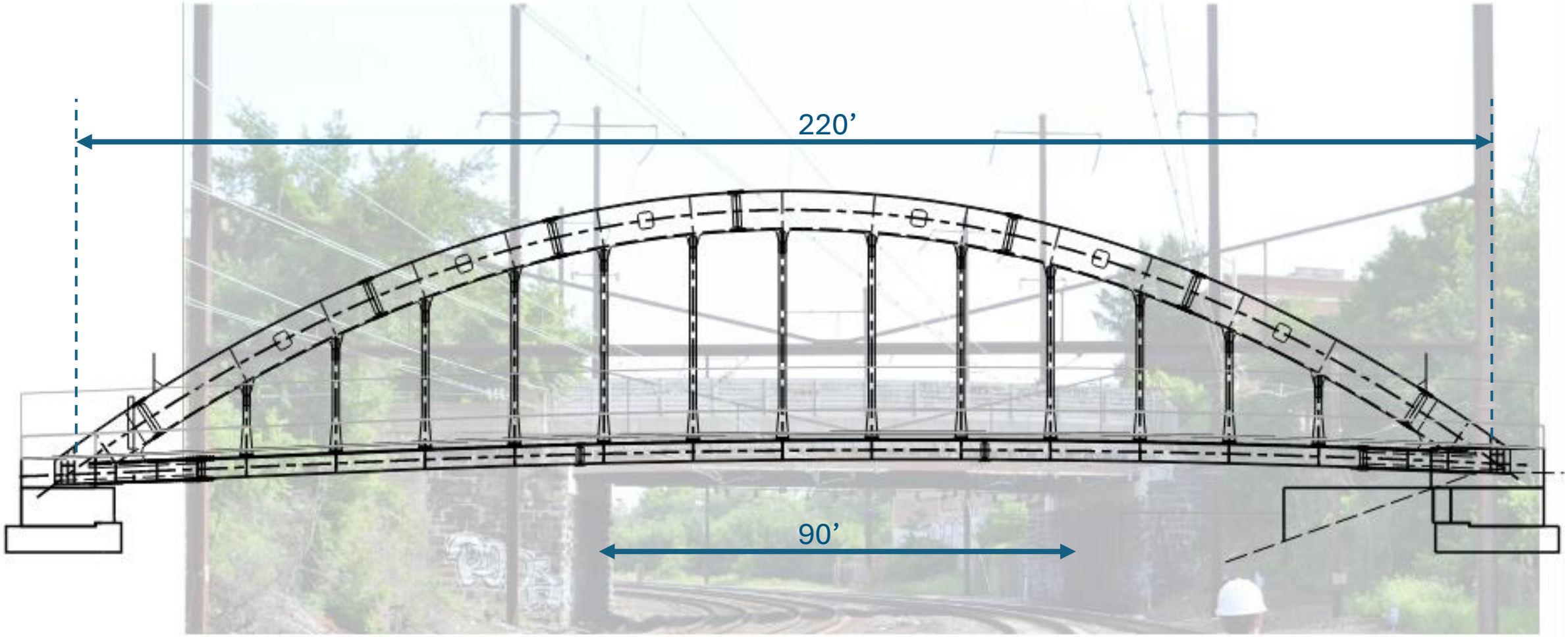
- Reconstructed in 1985
- Typical Bridge Construction
- 90’ span over 4 existing tracks
- 4 lanes + 2 sidewalks

Proposed Bridge

- Overhead Arch Bridge
- 220’ span over 4 new tracks
- 4 lanes + well lit sidewalk and shared use path

Existing and Proposed Edmondson Ave Bridge

- Proposed Arch Bridge



Protective Barrier Options at Edmondson Ave

Clear Panel with angled or curved top
(Woodrow Wilson Bridge)

Traditional Barrier over Railroad
(Existing Edmondson Bridge)

Edmondson Ave Bridge – Color Options