

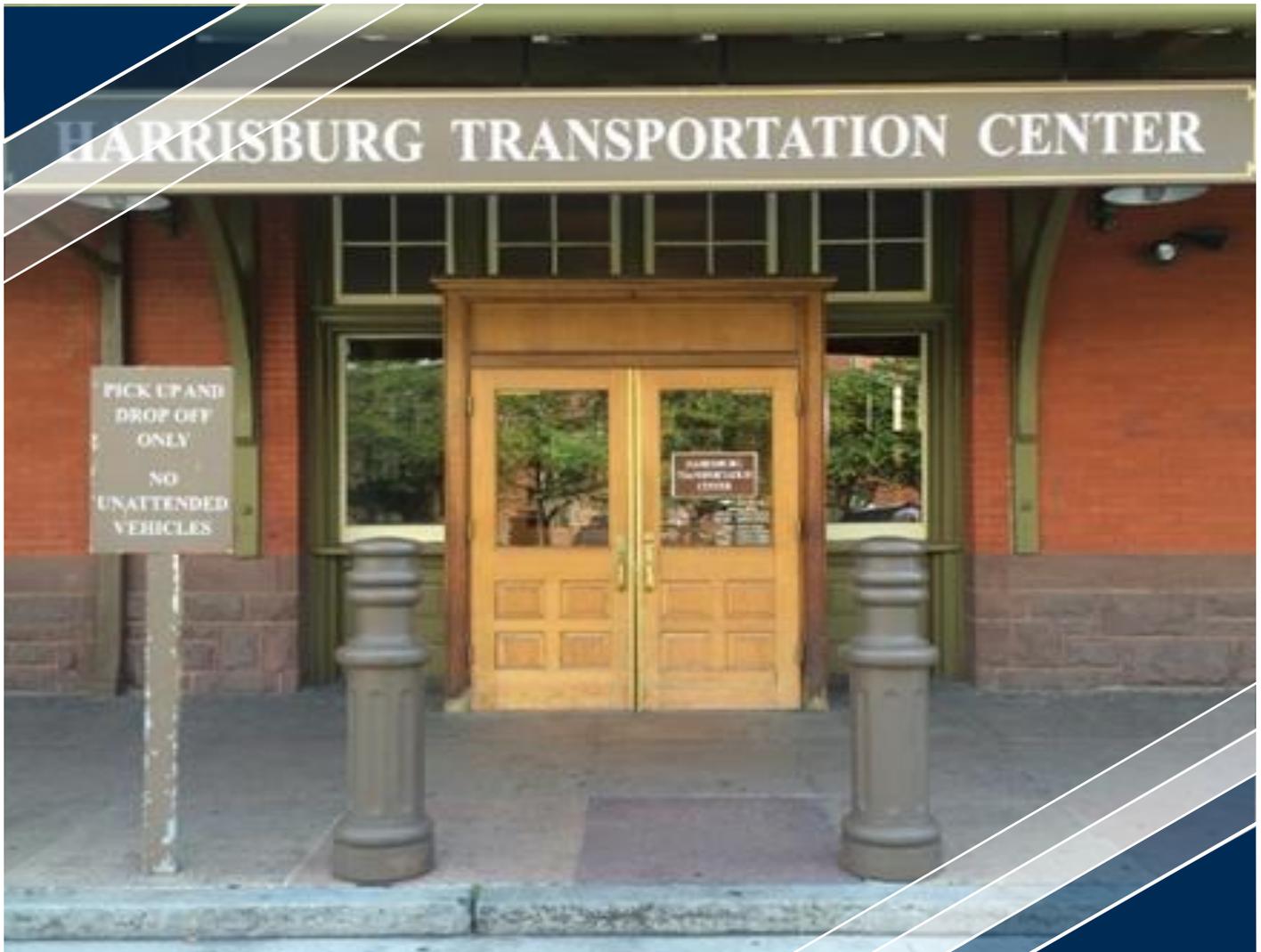


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# SECTION 4(F) EVALUATION

Harrisburg Transportation Center Preliminary Design Project

Submitted to:  
Pennsylvania Department of Transportation





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## I. INTRODUCTION

The Pennsylvania Department of Transportation Bureau of Public Transportation (PennDOT BPT), with the Federal Transit Administration (FTA) as the lead federal agency, proposes repairs and long term facility upgrades to the Harrisburg Transportation Center (HTC) in the City of Harrisburg, Dauphin County, Pennsylvania (**Appendix A**). The proposed project includes overall ADA accessibility and passenger flow enhancements, improvement of customer comfort, re-purposing inadequate and underutilized/unoccupied spaces, maintaining a state of good repair, and modernizing general building systems and other supporting infrastructure.

Pursuant to Section 4(f) of the U.S. Department of Transportation Act of 1966, 49 USC § 303, as amended, the Secretary of Transportation may approve a transportation program or project requiring the use of publicly owned land including a public park, recreation area, or wildlife and waterfowl refuge of national, state or local significance, or land of a historic site of national, state, or local significance (as determined by the federal, state, or local officials having jurisdiction over the park, area, refuge, or site) only if:

- There is no prudent and feasible alternative to using that land, and;
- The program or project includes all possible planning to minimize harm to the park, recreation area, wildlife and waterfowl refuge, or historic site resulting from the use.

The Secretary may also approve such use if FTA determines that the use of the property has a *de minimis* impact. A *de minimis* impact, in general, means that the use of the transportation project will not adversely affect the activities, features, and attributes of the Section 4(f) resource (SAFETEA-LU Section 6009 Implementation Study). A project may “use” land from a Section 4(f) resource in three ways:

- When land is permanently incorporated into a transportation facility;
- When there is a temporary occupancy of land that is adverse in terms of the statute’s preservation purpose as determined by the criteria set forth in 23 CFR § 774.13(d); or
- When there is a constructive use of a Section 4(f) resource as determined by the criteria set forth at 23 CFR § 774.15.

If no prudent and feasible avoidance alternative exists, the alternative that results in the least harm and that includes all possible minimization efforts to the Section 4(f) resource, may be approved. If an alternative avoids the Section 4(f) resource and is found to be prudent and feasible it must be selected.

Four (4) Section 4(f) resources have been identified within the project area (**Appendix A**). All four Section 4(f) resources are Historic Properties. No public parks, recreation areas, or wildlife or waterfowl refuges are located within the project area.

- Pennsylvania Railroad: Harrisburg Station and Trainshed – National Register listed (1975), National Historic landmark (1976) – PHMC Key # 000517;
- Pennsylvania GG1 Electric Locomotive #4859 - National Register listed (2004) – PHMC Key # 086565;

- Pennsylvania Railroad: Main Line (Philadelphia to Harrisburg) – eligible for listing in the National Register (1993) – PHMC Key # 105675; and
- Pennsylvania Railroad: Main Line (Harrisburg to Pittsburgh) – eligible for listing in the National Register (1993) – PHMC Key # 112369.

FTA has determined that the Pennsylvania GG1 Electric Locomotive, Pennsylvania Railroad: Main Line (Philadelphia to Harrisburg), and Pennsylvania Railroad: Main Line (Harrisburg to Pittsburgh) would not have a Section 4(f) use from the proposed project. Although these resources are listed or eligible for listing on the National register, FTA has determined that the project would not permanently incorporate land associated with these historic resources into the project nor would the project substantially impair the attributes, features, and activities that qualify these resources for protection under Section 4(f). Therefore, the only property being evaluated in this individual Section 4(f) document is the Pennsylvania Railroad: Harrisburg Station and Trainshed.

The term “individual Section 4(f) evaluation” is used in this evaluation to refer to the process of assessing avoidance alternatives, determining the alternative with the least overall harm, and considering all possible planning to minimize harm.

The officials with jurisdiction over the historic Section 4(f) resources are the Pennsylvania Historical and Museum Commission (PHMC), the Pennsylvania State Historic Preservation Office (PA SHPO); and the National Park Service (NPS) because the Pennsylvania Railroad: Harrisburg Station and Trainshed is a National Historic Landmark. FTA and the PA SHPO have found that the proposed project would have an Adverse Effect (**Appendix B**) on the National Register-listed Pennsylvania Railroad: Harrisburg Station and Trainshed. An adverse effect finding would preclude this project from a *de minimis* impact finding. PennDOT BPT and FTA have therefore determined that an Individual Section 4(f) Evaluation is required.

## II. PURPOSE AND NEED

The purpose of this project is to enhance customer experience at the HTC, to remove ADA barriers where appropriate, to increase use of underutilized spaces within the existing station, and to attract tenants to transform the HTC into a center for redevelopment in the area. This project compliments a larger study regarding Transit Oriented Development (TOD) within the City of Harrisburg.

To achieve these overarching goals, the following needs have been identified for the HTC facility:

- Improve accessible routes for ADA compliance between the public parking areas, adjacent bus shelters, and the station. New ADA compliant parking spaces are also being provided.
- Improve customer movement through the main waiting area and create added availability and visibility to retail opportunities
- Enhance customer amenities in the concourse area and increase seating opportunities with convenient work and social areas and for a diversity of customers

- Improve security and safety through upgraded facilities for the police operations (holding areas, interview and training room) and improve Amtrak police access to the station (interior and exterior) and concourse areas
- Create a useful and inviting meeting space for visitors and tenants in the Observation Room through renovation of finishes, update HVAC system, improve lighting and acoustics with audio/video equipment, and repair cracked and aging glass curtain wall
- Replace the aging, leaking and poorly draining station roofs and associated skylights that have reached their serviceable life
- Provide new public restroom facilities that are ADA compliant/accessible, energy efficient, and adequate to meet the needs of a larger customer base.
- Meet the programming space requirements of the anticipated tenant on the second and third floors of the station. This includes providing larger office space, ADA compliant facilities, improved HVAC systems, and technology upgrades.

The HTC is an important and historic resource providing connection to regional bus and Amtrak rail service. The proposed project seeks to build upon prior building-wide existing conditions assessment efforts conducted in 2015 for PennDOT BPT, which covered all floors of the HTC building as well as the train shed area. Existing condition assessments considered ADA accessibility, passenger flow, customer comfort, inadequate and underutilized/unoccupied spaces, unfinished areas, as well as general building mechanical and electrical systems and supporting infrastructure. As a result of the building-wide existing conditions assessment, immediate repair needs and long-term facility upgrades were identified. PennDOT BPT recognizes that the HTC building and train shed area components require basic state of good repair improvements as well as renovations to garner the market potential that is currently not being realized. This project would begin to address these needs.

### III. IDENTIFICATION AND DESCRIPTION OF THE SECTION 4(F) RESOURCES EVALUATED IN DETAIL

#### Pennsylvania Railroad: Harrisburg Station and Trainshed

*The following description is adapted from the National Register of Historic Places Inventory Nomination Form submitted for the Pennsylvania Railroad: Harrisburg Station and Train Shed dated August 1976 with minor editing (Zembala, 1976).*

The Pennsylvania Railroad: Harrisburg Station and Trainshed (**Appendix A**) was listed in the National Register of Historic Places in 1975 and made a National Historic Landmark in 1976. The resource is significant under Criterion A: as a site that is associated with events that have made a significant contribution to the broad patterns of our history and Criterion C: a building that embodies the distinctive characteristics of a type, period, or method of construction.

The Old Pennsylvania Railroad Station (now the HTC) was constructed between 1885 and 1887. Two train sheds are located to the rear of the passenger station. The shed nearest the station was built in 1885 when construction of the station began. The far shed was built sometime after 1896. The trusses of the sheds are particularly significant. Known as Fink trusses, after the use of the same principle in the bridge truss of Albert Fink, the truss is derived from an inverted kings-post truss by introducing secondary kings-post trusses within the primary one.

Over the years, there have been several additions and modifications to the Harrisburg Station and Trainshed; however, the resource retains a significant amount of physical integrity to reflect the original use and historic associations. Character-defining features (based on the National Register Nomination and the National Historic Landmark Nomination) include the following:

Exterior of resource:

- Brick construction;
- Long horizontal massing;
- Window awnings;
- Historic dormers;
- Original wood windows; and
- Metal truss work supporting first floor overhang

Interior of resource:

- Separate waiting area and concourse;
- Fireplace, coffered ceiling, and mosaic tile flooring in the waiting area;
- Wood benches constructed along concourse half-wall; and
- Second and Third story office space

The proposed project would result in use of the Pennsylvania Railroad: Harrisburg Station and Trainshed, as the proposed improvements would alter several of the character defining features of the HTC. There is no temporary occupancy associated with this project. The improvements proposed include:

- Exterior Building Repairs: The proposed work includes the repair or replacement of wooden window sills and decorative trim, repair of the fabric awnings, repointing of the masonry, and repairs and replacement to the roof system. Attention is to be given to the historic character and aesthetic of the existing windows when designing replacements.
- Second & Third Floor Space Improvements: The second and third floors are primarily composed of office spaces that were designed and used by the Pennsylvania Railroad. The existing configuration of office layouts is segmented and not ideal for tenants. Improvements to the second

and third floors are needed to provide a more efficient utilization of the existing space. Upgrading is needed to result in marketable Class A/B office space/flex space.

The proposed work on the second and third floors requires the complete demolition of the existing partitions including the hallway and Railroad office spaces. These upgrades include the removal of all intermediate suite partitions, existing finishes, and the opening of floor plans. Renovation of the second and third floors also requires new shared restrooms including plumbing fixtures to implement contemporary water conservation devices and a fully ADA accessible design.

The proposed alterations would permanently remove the historic layout of these two floors, including the elements that retain their association with the Pennsylvania Railroad's occupancy of this space. These alterations would constitute an Adverse Effect as they would remove character defining features of the resource.

- **Main Waiting Area Improvements:** Minor updates to the main waiting area would include reconfiguring the existing retail space, removing the ca. 1980s Amtrak Police room, installing a shallow retail counter and café, and removing the vestibules at the main entrances. The fireplaces, coffered ceiling, and mosaic floor will not be impacted. To improve passenger flow and ADA accessibility, three of the six arched window/door openings in the wall between the main waiting area and the concourse/pedestrian bridge will be permanently opened. The removal of three window/door openings between the waiting area and concourse would constitute an adverse effect, as the wall between the two areas is a character-defining feature of the building's interior. The other proposed work to the retail spaces, the Amtrak Police room, and waiting area would not affect the character of the resource.
- **Concourse Repairs:** Basic updates and repairs to the existing concourse/pedestrian bridge include painting, cosmetic/finish repairs, new ceilings, and lighting and energy efficiency upgrades. In addition to these basic upgrades, the concourse will include several updated seating options. The project calls for the removal of the central, partial height wall and seating, which are character defining features of the resource and would constitute an adverse effect.

## IV. AVOIDANCE ALTERNATIVES ANALYSIS

Under Section 4(f), the use of parks, recreation areas, wildlife/waterfowl refuges and historic sites for transportation purposes may only occur if no feasible and prudent avoidance alternative to such use exists and if the project includes all possible planning to minimize harm to resources from such use. A feasible and prudent avoidance alternative, as defined in 23 CFR 774.17, avoids using Section 4(f) property and does not cause other severe problems of a magnitude that substantially outweigh the importance of protecting the Section 4(f) property. PennDOT BPT identified and evaluated potential avoidance alternatives for purposes of Section 4(f).

According to Section 4(f) regulations at 23 CFR §774.17, feasible and prudent is defined as:

- (1) A feasible and prudent avoidance alternative avoids using Section 4(f) property and does not cause other severe problems of a magnitude that substantially outweighs the importance of protecting the Section 4(f) property. In assessing the importance of protecting the Section 4(f) property, it is appropriate to consider the relative value of the resource to the preservation purpose of the statute.
- (2) An alternative is not feasible if it cannot be built as a matter of sound engineering judgment.
- (3) An alternative is not prudent if:
  - (i) It compromises the project to a degree that it is unreasonable to proceed with the project in light of its stated purpose and need;
  - (ii) It results in unacceptable safety or operational problems;
  - (iii) After reasonable mitigation, it still causes:
    - (A) Severe social, economic, or environmental impacts;
    - (B) Severe disruption to established communities;
    - (C) Severe disproportionate impacts to minority or low income populations; or
    - (D) Severe impacts to environmental resources protected under other Federal statutes;
  - (iv) It results in additional construction, maintenance, or operational costs of an extraordinary magnitude;
  - (v) It causes other unique problems or unusual factors; or
  - (vi) It involves multiple factors in paragraphs (3)(i) through (3)(v) of this definition, that while individually minor, cumulatively cause unique problems or impacts of extraordinary magnitude.

### **Alternative I: No-Build**

The No-Build Alternative involves taking no action, not proceeding with the proposed repairs and upgrades to the HTC, and continuing to utilize the HTC as it exists in its current condition. This alternative does not meet the purpose of this project, including removing ADA barriers, adding new ADA compliant restrooms, enhancing customer experience at the HTC, increasing use of underutilized spaces within the station, and attracting tenants to transform the HTC into a center for redevelopment in the area. This alternative is not prudent as it would result in unacceptable safety and operational problems resulting from the failure to meet ADA requirements. Implementation of the No-Build Alternative would be a Total Section 4(f) Resource Avoidance Alternative, but would fail to meet the project purpose and need. As such, the No-Build Alternative would not be a prudent avoidance alternative as it would not meet the stated purpose and need.

### **Alternative II: Phase 1**

The project team considered the alternative of only renovating the HTC Observation Room and repairing/replacing the HTC roof system and skylights, which would avoid an adverse effect to the resource and result in a *de minimis* Section 4(f) use of the Pennsylvania Railroad: Harrisburg Station and Trainshed.

The Observation Room is the station's multipurpose space that can be rented out for meetings and events. Large floor to ceiling windows provide optimal views of the active platforms below and a once exterior façade brings much character to the space. Renovations to the Observation Room would provide a state of the art multi-use space for meetings, conferences, catered and other event types. This space would include new flooring, ceiling upgrades, new glass curtain wall, adjacent storage space(s), A/V system, new lighting, and

new HVAC. The Observation Room is a modern addition to the HTC, and is therefore not contributing. Improvements to the Observation Room will not result in adverse impacts to contributing elements of the Pennsylvania Railroad: Harrisburg Station and Trainshed.

The station buildings' roofs are composed of a combination of materials including asphalt shingles, slate shingles, rolled modified bitumen, standing seam metal panels, and skylights. Portions of roofs have deficiencies that permit water to infiltrate the interior of the building during storm events. Water infiltration is especially problematic at the valley where the station building and train shed roofs meet. Many of the water issues at the HTC are a result of a poorly pitched and incorrectly flashed gutter system. Roof repairs and replacement work is to be as follows:

- A complete replacement of the HTC building first and second floor roofs, including standing seam roof and gutter at the HTC building and train shed roof interface.
- Repair and replacement components for the HTC building third floor (upper) roof.
- Other improvement to bring the existing HTC building roofs to a state of good repair include patching and flashing of penetrations, gutters, leaders, snow guard system, and skylight replacement in the Concourse and Observation Room.
- The roofs have been replaced as needed throughout the HTC's existence and consist of multiple roofs and varying materials making it a non-contributing element of the HTC structure.

The HTC roofs and Observation Room are not contributing elements of the Pennsylvania Railroad: Harrisburg Station and Trainshed. The roofs have been replaced as needed throughout the HTC's existence and consist of multiple roofs and varying materials making it a non-contributing element of the HTC structure. The Observation Room is a modern addition to the HTC, and is therefore not contributing. The construction required to retrofit the Observation Room and create a multipurpose space with state of the art amenities will not impact other contributing elements of the HTC or diminish the integrity of the property's significant historic features or those characteristics that make it eligible for listing in the National Register of Historic Places. As such, the Phase 1 Alternative would likely result in a No Adverse Effect Section 106 finding and a *de minimis* use of the Pennsylvania Railroad: Harrisburg Station and Trainshed.

The Phase 1 alternative would result in a *de minimis* Section 4(f) use as it would only affect non-contributing elements from the Pennsylvania Railroad: Harrisburg Station and Trainshed and would result in a no adverse effect finding under Section 106. Phase 1 addresses renovations to the Observation Room and repair/replacement of the HTC roof system and skylights, however it fails to address operational and passenger flow issues. Phase 1 does not address the Station's ADA accessibility needs, safety issues involved with required ADA improvements, customer movement through main waiting area, retail opportunities, enhancement of customer amenities in concourse areas, security and safety, adequate public restroom facilities, or programming space requirements for second and third floor tenants. In addition this alternative would potentially introduce costs of an extraordinary magnitude as it would duplicate certain design and construction elements. This alternative would not be a prudent avoidance alternative as it would not meet the stated purpose and need.

### **Alternative III: The HTC Station Repair/Renovation Program – Phase 1 & Phase 2**

The HTC Station Repair/Renovation Program (**Appendix C**) would improve various aspects of the HTC, including but not limited to: overall accessibility and passenger flow enhancements, improving customer comfort, re-purposing inadequate and underutilized/unoccupied spaces, maintaining a state of good repair, and modernizing general building systems and other supporting infrastructure. The following improvements would be included in this alternative:

Observation Room Renovation – The Observation Room is the station’s multipurpose space that can be rented out for meetings and events. Large floor to ceiling windows provide optimal views of the active platforms below and a once exterior façade brings much character to the space. Renovations to the Observation Room would provide a state of the art multi-use space for meetings, conferences, catered and other event types. This space would include new flooring, ceiling upgrades, new glass curtain wall, adjacent storage space(s), A/V system, new lighting, and new HVAC. The Observation Room is a modern addition to the HTC, and is therefore not contributing. Improvements to the Observation Room will not result in adverse impacts to contributing elements of the Pennsylvania Railroad: Harrisburg Station and Trainshed.

Repair/replacement of Station Roof Systems and Skylights - The station buildings’ roofs are composed of a combination of materials including asphalt shingles, slate shingles, rolled modified bitumen, standing seam metal panels, and skylights. Portions of roofs have deficiencies that permit water to infiltrate the interior of the building during storm events. Water infiltration is especially problematic at the valley where the station building and train shed roofs meet. Many of the water issues at the HTC are a result of a poorly pitched and incorrectly flashed gutter system. Roof repairs and replacement work is to be as follows:

- A complete replacement of the HTC building first and second floor roofs, including standing seam roof and gutter at the HTC building and train shed roof interface.
- Repair and replacement components for the HTC building third floor (upper) roof.
- Other improvement to bring the existing HTC building roofs to a state of good repair include patching and flashing of penetrations, gutters, leaders, snow guard system, and skylight replacement in the Concourse and Observation Room.

The roofs have been replaced as needed throughout the HTC’s existence and consist of multiple roofs and varying materials making it a non-contributing element of the HTC structure.

First Floor Public Restrooms Renovations - The public restrooms on the first floor do not comply with ADA standards. The fixtures and finishes, installed during the early 1980s renovation of the HTC, are in poor condition and at the end of their effective lifespan. To bring the current restroom facilities up to date, meeting building code and ADA standards, significant renovation is necessary. A complete renovation creating new restrooms ensures that the facilities will accommodate present and future occupants and passengers.

New restrooms will encompass the existing restroom space as well as the adjacent Amtrak offices, which will be relocated within the first floor of the building. Larger restroom facilities will be better suited to handle a surge of users around departure and arrival times and allow for future growth in ridership. The

proposed layout will provide all the required amenities and standards per the Amtrak Station Program and Planning Guide and Standard Design Practices. This area will also include a family restroom, janitor's closet, and drinking fountain.

Second and Third Floor Access Provisions – Existing second and third floor access is provided by an elevator and two stair towers. Existing egress hardware at the stair towers is not code compliant nor safe for occupants. New and upgraded access needs would be addressed to support potential space upgrades to the second and third floors.

Overall project goals require upgrades to the elevator and stair tower access patterns with private and secure entry. With the construction of a private access lobby on the main floor, the new vertical circulation pattern would provide access directly from the second and third floor office spaces to the exterior of the building without having to pass through adjacent office spaces or the station lobby. A separate public elevator will provide access from the main/first floor to the lower level, connecting the bus terminal with the train station. The stairway and elevators are to be fully compliant with all ADA requirements. In addition, the existing stairways on the opposite end of the building shall comply with all applicable building codes and receive updated egress hardware.

ADA Accessibility Improvements – Accessibility would be improved throughout the building by providing fully accessible pathways, amenities, fixtures, and door hardware. The area of most concern is the door hardware, which, in most instances, do not meet graspability, reach, or egress requirements.

Parking and walkway areas of the HTC site would be improved to meet minimum requirements for site accessibility, specifically, accessible routes between various transit amenities. Nearby bus shelters, ADA parking, sidewalks, and the HTC building would be properly upgraded to meet ADA requirements. The appropriate number of ADA parking stalls would be provided in all designated parking areas for employee and customer parking. In addition, selected tree removal and landscaping improvements would be made to improve visibility for pedestrians walking to and from the HTC via Market Street and Aberdeen Street.

Main Waiting Area Improvements – The Main Waiting Area and Concourse is in good condition overall. This space currently provides access to ticketing, red cap service, the lower level, retail, and concourse. Continuous upkeep and maintenance has kept the lobby spaces in good working order since the last major renovation in the early 1980s. The 1980's renovation added a room between the two main entry doors, which is currently dedicated to Amtrak police. This 1980s add-on room is underutilized.

Proposed upgrades to include additional seating, additional passenger amenities, and improved retail uses. In doing this, the Main Waiting Area would be a destination rather than a transient space where customers pass through. There would be a variety of leasable spaces including fixed shops, semi-movable kiosks and movable retail merchandising units. Potential leasing opportunities include but are not limited to café, newsstand, convenience store, farmers market, and various shops that could sell, local products, flowers, candy, greeting cards/ stationary, gifts, souvenirs, etc.

In reconceiving the Main Waiting Area, the overall structure and aesthetic will remain intact. The aforementioned functions are to be inserted onto the space in a tasteful manner to preserve the integrity

of the original design. The only exception to this would be the removal of the current Amtrak Police Station structure, which is not a contributing element to the Pennsylvania Railroad: Harrisburg Station and Trainshed. Removing this room would create an open, expansive, and continuous space. This would visually and physically tie the space together and provide opportunities for new leasable areas. Other considerations for the Main Waiting Area include maintaining a police presence, renaming one ticket window as “Customer Service” and possible reuse of one or both fire places by retrofitting with a vent-less gas unit.

First Floor Retail Tenant Space Improvements – The first-floor retail space is in good working order but space constraints create cramped conditions for customers during high occupancy. Finishes within the space are in fair condition.

Bringing the leasable tenant space out in to the Main Waiting Area would create more retail opportunities while allowing the current tenant space and adjacent rooms to be reprogrammed with displaced programs, including the Amtrak Police Station and Amtrak Administration Offices. Retail and restaurant programming would be located in the underutilized spaces of the Main Waiting Area.

Exterior Building Repairs – The station building’s brick facades are generally in good condition. General repairs, repointing, and cleaning of the brick and masonry facade would be made to express the architectural intent of the existing structure.

The existing windows are constructed of wood and single pane glass, which contribute to thermal inefficiency. Many of the wooden window sills and decorative trim have significant rot and are in disrepair, needing repair or replacement. Attention would be given to the historic character and aesthetic of the existing windows when designing replacements. To minimize the potential adverse effect of the window repairs, the final selection of materials and repair techniques would be coordinated with the PHMC and all exterior work would meet the guidelines of the Secretary of the Interior’s Standards for the Treatment of Historic Properties.

The exterior fabric awnings shading the second and third floor windows on the front station facade have sustained ultraviolet fading and appear worn. All awnings that are damaged would be replaced or repaired to complement the architectural intent of the existing building.

Second and Third Floor Space Improvements – The second and third floors are currently composed of office space, private restrooms, mechanical/janitor rooms, and the Rail Operations Control Room on the southern end of the second floor. The existing configuration of office layouts is segmented and not ideal for tenants. Additionally, the third-floor office spaces are constrained by dormers, resulting in irregular layouts. The existing office suite construction is not up to current building standards, lending to flimsy walls with poor acoustical isolation. The majority of the suite finishes are in poor condition. Given the condition, dimensional constraints and limited amenities, the current second and third floor offices would generally be classified as Class C.

Improvement to the second and third floor would focus on a more efficient utilization of the existing space. Upgrades would result in marketable Class A/B office space/flex space.

Updating the second and third floor office spaces to Class A space requires the complete demolition of the existing floor partitions and upgrades to all related amenities and building services. A building standard finish would need to be developed to align with Class A office stock in the Harrisburg area. In addition, other building service and element upgrades are required for Class A office space. A dedicated elevator and elevator lobby accessing upper floors would be separated from transit facility use. Renovation of the second and third floors also requires new shared restrooms including plumbing fixtures to implement contemporary water conservation devices and fully ADA accessible design. This, in combination with onsite dedicated parking for tenants and visitors, would elevate the upper floors to Class A office space.

Updating the second and third floor offices spaces to Class B space requires the removal of all intermediate suite partitions, existing finishes, and the opening of floor plans. Open floor plans provide potential clients/tenants with an opportunity to customize their suite as necessary for business. The fit and finish of the offices and amenities would be aligned with Class B office stock in the Harrisburg areas.

Concourse Repairs – Basic updates and repairs to the existing concourse/pedestrian bridge include painting, cosmetic/finish repairs, ceilings, and lighting and energy efficiency upgrades. In addition to these basic upgrades, the center seating/wall would be removed and replaced with various seating options, which may include table top and laptop workstations.

Alternative III would result in a Section 4(f) use of the Pennsylvania Railroad: Harrisburg Station and Trainshed. The Alternative would alter several of the character-defining features of the HTC, which would constitute an Adverse Effect, including the following:

- Removal of the historic layout of the second and third floors, including the elements that retain their association with the Pennsylvania Railroad's occupancy of this space.
- Removal of three of the six original window/door openings between the main waiting area and the concourse/pedestrian bridge.
- Basic updates and repairs to the existing concourse/pedestrian bridge, including the removal of the central, partial height wall and wood bench seating, which are character defining features of the resource.

The HTC Station Repair/Renovation Program Alternative would provide overall accessibility and passenger flow enhancements, improve customer comfort, re-purpose inadequate and underutilized/unoccupied spaces, maintain a state of good repair, and modernize general building systems and other supporting infrastructure. Although Alternative III is not an avoidance alternative, as it would result in a use of the Pennsylvania Railroad: Harrisburg Station and Trainshed, this alternative meets the purpose and needs of the project, does not cause safety or operational problems, would not cause significant social, economic, or environmental impacts, and would not result in costs of extraordinary magnitude. This alternative satisfies the stated purpose and needs of the project, but would not be a feasible or prudent avoidance alternative as it results in a use of the historic resource.



Summary of Avoidance Alternatives Analysis

There is no feasible and prudent avoidance alternative. Alternative I: No Build and Alternative II: Phase 1 avoid the use of the historic resource; however, they do not meet the project purpose and need and are therefore not prudent. Neither Alternative I nor II fully address the ADA safety and operational needs of the project. Alternative III: The HTC Station Repair/Renovation Program – Phase 1 & Phase 2 meets the project purpose and need but does not avoid the use of the Pennsylvania Railroad: Harrisburg Station and Trainshed. This alternative would result in a Section 106 adverse effect determination and a Section 4(f) use.

**Table 1 – Avoidance Alternatives Analysis**

Avoidance Alternative	Meets Purpose and Need	Feasible	Prudent	Alternative Dismissed or Moved Forward
<b>I: No-Build</b>	No	Yes	No	<b>Dismissed:</b> Does not meet any of the project purpose and needs. Fails to meet the ADA safety and operational needs of the project.
<b>II: Phase 1</b>	No	Yes	No	<b>Dismissed:</b> Does not meet the project purpose and need. <ul style="list-style-type: none"> <li>• Does not address needs in Main Waiting Area, Concourse, ADA public restroom facilities, or second and third floors.</li> <li>• Fails to improve ADA accessibility inside and outside of HTC.</li> <li>• Fails to improve security and safety of HTC.</li> <li>• Fails to achieve state of good repair improvements.</li> <li>• Does not attract tenants and fails to transform HTC into a center for redevelopment.</li> <li>• Fails to meet the ADA safety and operational needs of the project.</li> </ul>
<b>III: The HTC Station Repair/Renovation Program – Phase 1 &amp; Phase 2</b>	Yes	Yes	Yes	<b>Moved Forward:</b> Alternative meets the project purpose and need but constitutes the “use” of a Section 4(f) Resource. It is the only viable alternative that meets the project purpose and need and is the alternative with the least overall harm to the resource.

## V. DETERMINE ALTERNATIVE WITH LEAST OVERALL HARM

If no feasible and prudent alternative is identified that would avoid using a Section 4(f) property, FTA must determine the alternative that would cause the least overall harm to Section 4(f) properties using the following factors (23 CFR 774.3(c)1):

- 1) the ability to mitigate adverse impacts to each Section 4(f) property;
- 2) the relative severity of the remaining harm after mitigation;
- 3) the relative significance of each Section 4(f) property;
- 4) the views of the officials with jurisdiction over each property;
- 5) the degree to which each alternative meets the project purpose and need;
- 6) the magnitude of adverse effects to resources not protected by Section 4(f); and
- 7) substantial cost differences among the alternatives.

### Assessment of Least Harm/All Possible Planning to Minimize Harm

Because there is no feasible and prudent avoidance alternative, FTA must weigh the factors under 23 CFR 774.3(c)(1) to determine the alternative with the least overall harm. Measures to avoid the use of the Section 4(f) resources were explored, but the alternative that avoided the use of the Section 4(f) Resource (Alternative I: No-Build) would not meet the purpose and needs of the project. The No-Build alternative would mean doing nothing to the resource, which could ultimately result in “harm” to the resource by allowing it to deteriorate beyond repair.

Alternative II would repair/replace the roofs and skylights, and make improvements to the Observation Room, which would have No Adverse Effect on the resource. However, it does not address the other interior and exterior deteriorated conditions of the HTC, which could result in long term, costly repairs, and if completely neglected could allow extensive deterioration beyond repair. Although there would be a *de minimis* use of the Section 4(f) Resource, Alternative II could result in “harm” to the resource.

Modifications to minimize harm to the Section 4(f) resource were considered in development of Alternative III.

Effects to the character defining features of the building exterior will be avoided by ensuring through coordination with the PA SHPO that all proposed masonry, window, and awning repairs meet the Secretary of the Interior’s Standards for Rehabilitation. No changes to the overall massing are proposed. All materials will be replaced in-kind, including the roof material, wood windows, and awnings.

Within the main waiting area, impacts to the coffered ceiling, mosaic tile flooring, columns, and lighting will be avoided, as no changes are proposed to those features. Should the fireplaces be reused, the vent-less gas units will avoid any impacts to the mantle or fireplace surrounds. Opening three of the six passageways between the main waiting room and concourse are necessary to improve passenger flow and ADA accessibility, and is considered to be a use of the Section 4(f) resource. Impacts to the openings are

minimized by retaining two of the window/door openings between the waiting area and concourse, and by retaining the original wood trim surrounding arched openings. The loss of the features will be mitigated through additional documentation in the update to the 1980s Historic Structures Report.

Within the concourse effects to the flooring and ceiling will be avoided as no changes are proposed to those features. Impacts to the partial height wall will be minimized by shortening, rather than removing, the wall. PennDOT is considering the reuse of some of the bench seating, which could further minimize impacts to the character-defining feature. Impacts will be mitigated through additional documentation in the update to the 1980s Historic Structures Report.

The contributing second and third floor office space and hallway partitions would need to be removed to allow for the construction of the programming space requirements for anticipated tenants. To construct the necessary Class A office space, the removal of existing partitions could not be avoided or minimized. Impacts to the original control center on the second floor will be avoided. As mitigation for the removal of the second and third floor office space, the following items will be completed for the control center:

- Documentation and assessment of the room and equipment
- Inventory of the equipment, including historic photographs, historic documents, plans, and descriptions of the function/use of the equipment (where information is available)
- Oral interviews of former employees who worked in the control center
- Documentation about the role of the control center. The format of the documentation is dependent on the research and resources available

The stated purpose of the project, which is to enhance customer experience at the HTC, to remove ADA barriers where appropriate, to increase use of underutilized spaces within the existing station, and to attract tenants to transform the HTC into a center for redevelopment in the area, is not supported by the No-Build Alternative or Alternative II. Therefore, FTA has determined that the alternative with the least overall harm is Alternative III: The HTC Station Repair/ Renovation Program – Phase 1 & Phase 2 and all possible planning to minimize harm has been documented.

## VI. COORDINATION WITH OFFICIAL OF JURISDICTION

The officials with jurisdiction include the PA SHPO and the NPS. Per the Determination of Effect Report, FTA found that Alternative III would result in an adverse effect on the Pennsylvania Railroad: Harrisburg Station and Trainshed. The finding was submitted to the PA SHPO, which concurred in the finding of adverse effect in a letter dated May 31, 2017 (**Appendix B**). The FTA, PennDOT BPT, the PA SHPO, and the NPS will enter into a Memorandum of Agreement (MOA) that outlines all steps that will be taken to complete Section 106 and Section 4(f) mitigation.

## VII. CONCLUSION

Based on an analysis of the avoidance alternatives and weighing the project purpose and need with the use of Section 4(f) resources, there is no feasible and prudent avoidance alternative. Alternative III: The HTC Station Repair/Renovation Program – Phase 1 & Phase 2 would cause the least overall harm while meeting the project's purpose and needs in comparison to the other project alternatives and in light of Section 4(f)'s preservation purpose. PennDOT BPT has committed to minimize harm to the Section 4(f) resources with proposed mitigation for the historic resources.

## VIII. RESOURCES

Bureau for Historic Preservation (BHP)

n.d. *Researcher's Guidelines for Documenting and Evaluating Railroads*. Harrisburg: Pennsylvania Historical & Museum Commission. From [http://www.portal.state.pa.us/portal/server.pt/community/research\\_tools/20176/guidelines\\_for\\_documenting\\_and\\_evaluating\\_railroads/943356](http://www.portal.state.pa.us/portal/server.pt/community/research_tools/20176/guidelines_for_documenting_and_evaluating_railroads/943356) (Accessed August 25, 2014).

JMT, Inc.

2017 *Determination of Effects Report, Harrisburg Transportation Center Preliminary Design Project – Phase 1*. March 2017.

2017 *Determination of Effects Report, Harrisburg Transportation Center Preliminary Design Project – Phase 2*. March 2017.

United States Department of the Interior (USDOI), National Park Service (NPS)

1995 *The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, rehabilitating, Restoring & Reconstructing Historic Buildings*. Washington, D.C.: National Park Service.

1997 *How to Apply the National Register Criteria for Evaluation*. Washington, D.C.: National Park Service.

United States Government Publishing Office (USGPO)

2017 23 CFR §774.17 Definitions. Washington, DC: U.S. Government Publishing Office.

Zembala, Dennis M.

1976 *National Register of Historic Places Inventory Nomination Form submitted for the Harrisburg Central Railroad: Station & Trainshed*. August 1976.



## Appendix A: Figures and Photographs

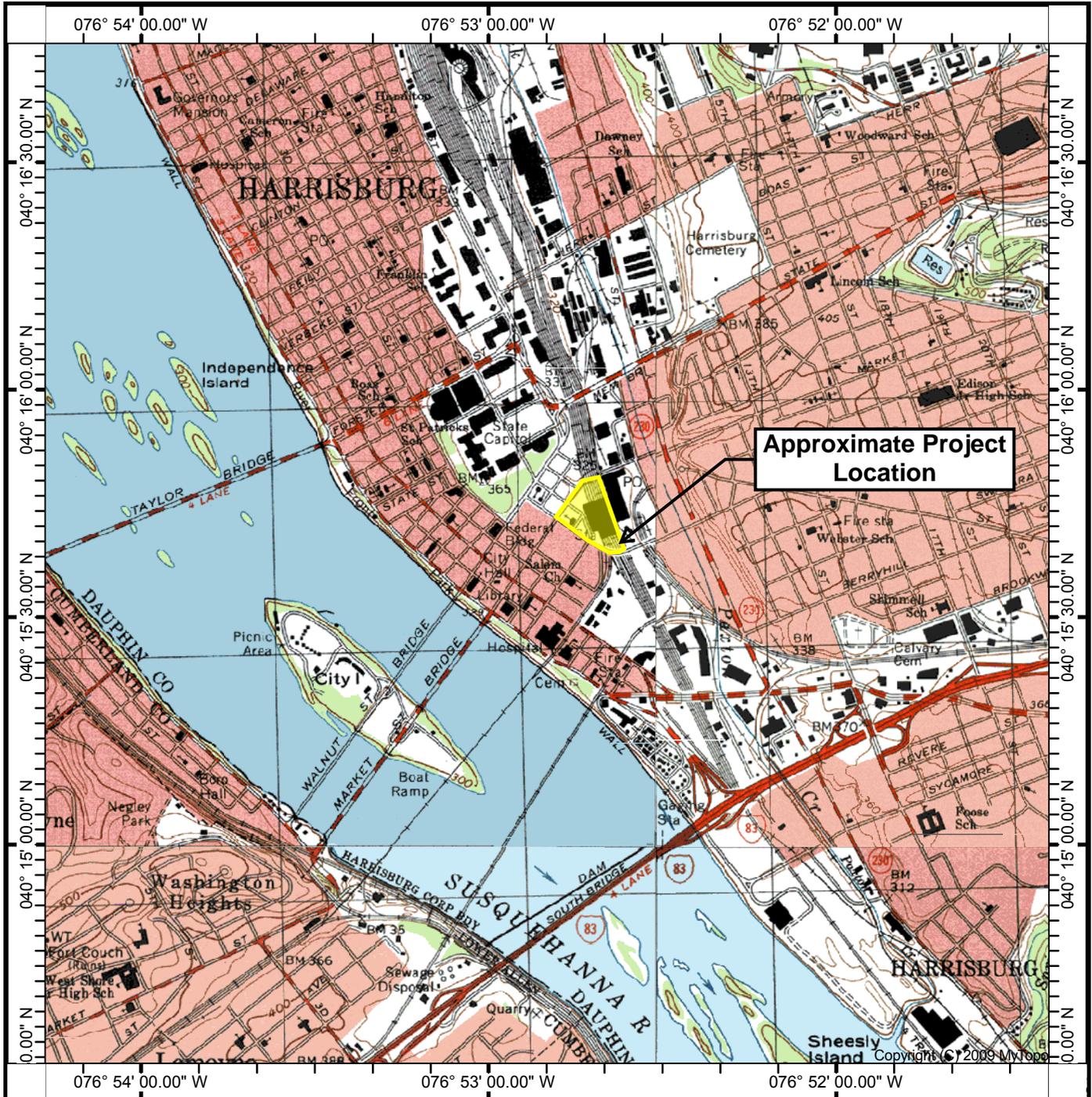
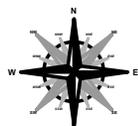
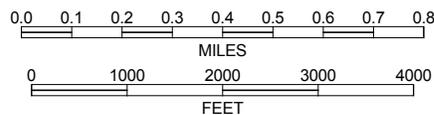


Figure 1: Project Location Map

Harrisburg Transportation Center (HTC) Preliminary Design Project  
City of Harrisburg, Dauphin County, PA



SCALE 1:24000





## Figure 2. Aerial Site Map

Harrisburg Transportation Center (HTC) Preliminary Design Project  
City of Harrisburg, Dauphin County



0 125 250 500  
Feet



# Harrisburg Transportation Center Preliminary Design Project

HARRISBURG, DAUPHIN COUNTY, PENNSYLVANIA

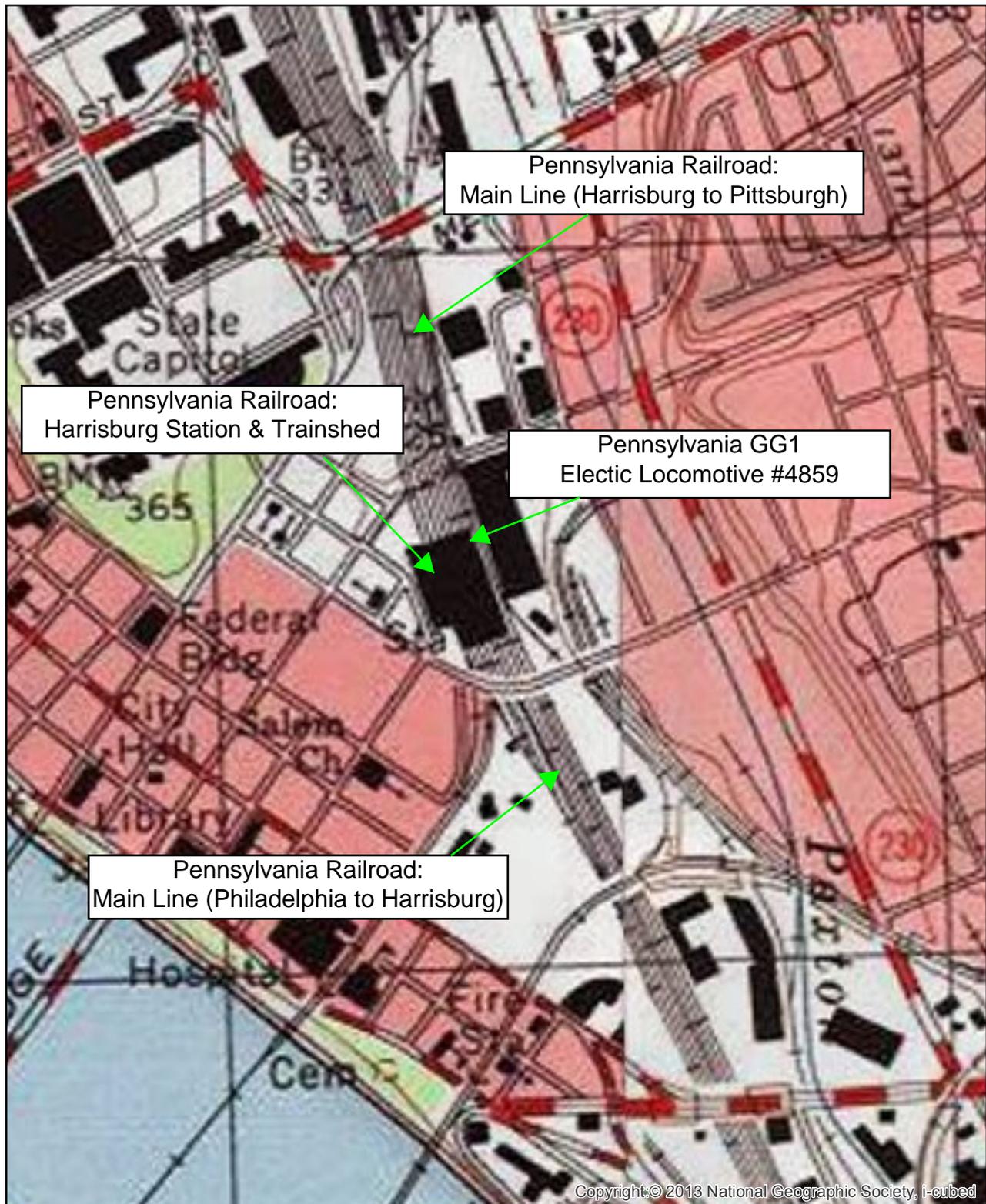


Figure 3: Resource Location Map

0 0.05 0.1 0.2 Miles





Photograph 1: View of Harrisburg Transportation Center, looking southeast.



Photograph 2: Detail view of the main façade of the Harrisburg Transportation Center, looking east.



Photograph 3: View of Harrisburg Transportation Center's main façade, looking north-northeast.



Photograph 4: Overview of Harrisburg Transportation Center, looking north-northeast.



Photograph 5: View of Harrisburg Transportation Center, looking northwest.



Photograph 6: View of Harrisburg Transportation Center, looking southeast.



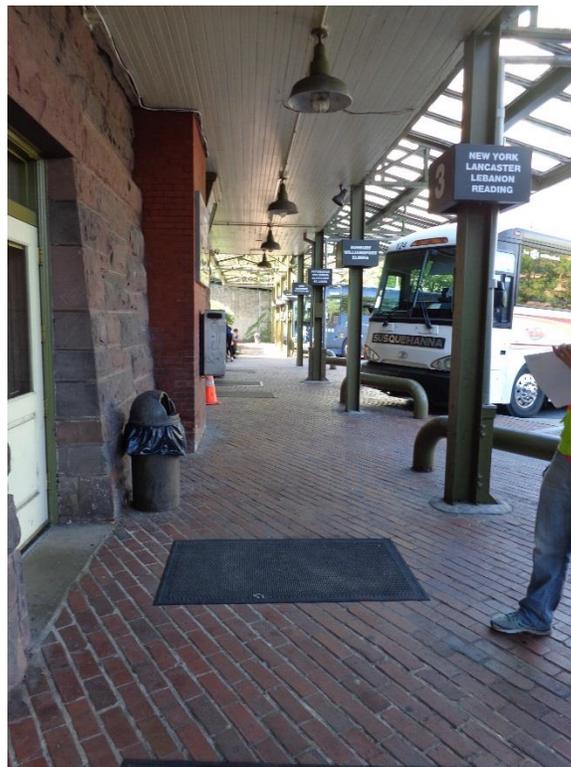
Photograph 7: View of Harrisburg Transportation Center, looking northwest.



Photograph 8: View showing permanently closed window openings on the southern façade of the Harrisburg Transportation Center, looking northeast.



Photograph 9: View of the Harrisburg Transportation Center Regional Bus Terminal, looking west.



Photograph 10: View of the Harrisburg Transportation Center Regional Bus Terminal, looking east.



Photograph 11: Interior view of the passenger waiting area of Harrisburg Transportation Center at Gate 4, looking southeast.



Photograph 12: Interior view of Harrisburg Transportation Center passenger waiting area at Gate 2, looking northwest.



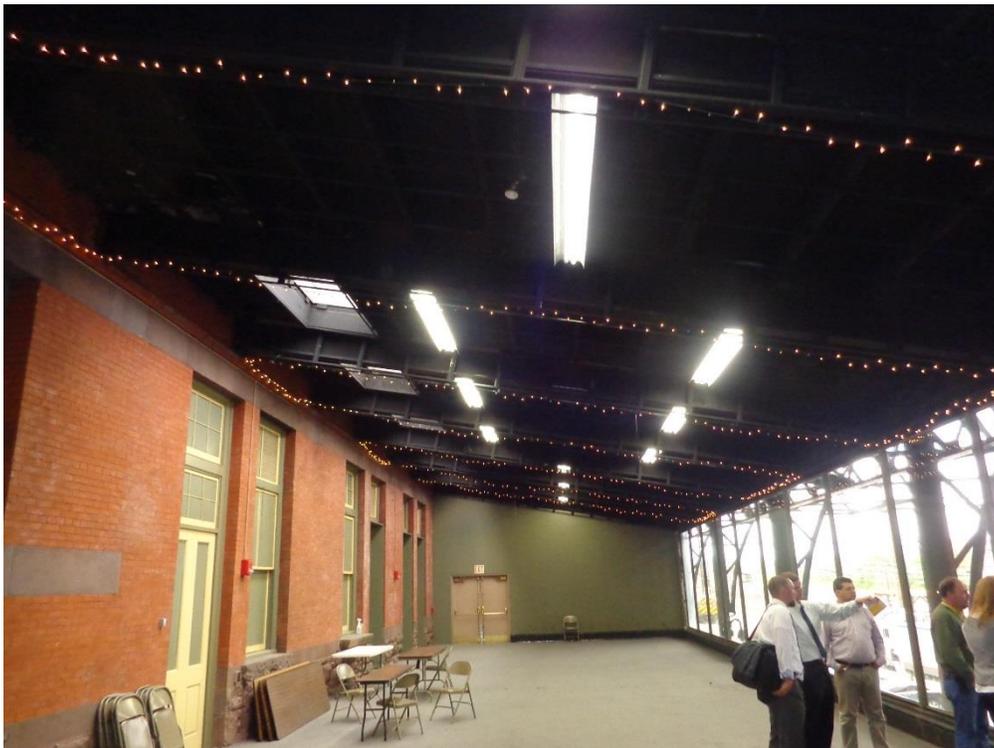
Photograph 13: Interior view of the Observation Room at the Harrisburg Transportation Center, looking southeast.



Photograph 14: Interior view of the Observation Room at the Harrisburg Transportation Center, looking southeast.



Photograph 15: Interior view of the Observation Room at the Harrisburg Transportation Center, looking south.



Photograph 16: Interior view of the Observation Room at the Harrisburg Transportation Center, looking north.



Photograph 17: Interior view of office space on the second floor of the Harrisburg Transportation Center.



Photograph 18: Interior view of office space on the second floor of the Harrisburg Transportation Center.



Photograph 19: Interior view of a corridor on the third floor of the Harrisburg Transportation Center.



Photograph 20: Interior view of the elevator door and skylight on the third floor of the Harrisburg Transportation Center.



## Appendix B: Correspondence



# Pennsylvania State Historic Preservation Office

PENNSYLVANIA HISTORICAL AND MUSEUM COMMISSION

May 31, 2017

Daniel Koenig  
Environmental Protection Specialist  
US Department of Transportation  
Federal Transit Administration  
Region III  
1760 Market Street Suite 500  
Philadelphia PA 19103-4124

ER 2016-2067-043-F: Harrisburg Transportation Center, Harrisburg Dauphin County, FTA, May 23, 2017 meeting/Agency finding of Adverse Effect

Dear Mr. Koenig,

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.

### **Agency Effect Finding**

The PA SHPO concurs with the federal agency that the project will have an adverse effect on the National Register of Historic Places listed and National Historic Landmark, Pennsylvania Railroad Station and Trainshed, Harrisburg, Dauphin County, PA SHPO Key # 000517.

### **PA SHPO Covenant**

Please be advised that the PA SHPO holds a covenant on the property. Our office will forward the submission to our Covenant Manger, Karen Arnold for review.

### **Historic Documentation**

Please provide historic photographs for those areas where significant changes will occur (arched openings, concourse/pedestrian bridge, etc.)

### **Project Clarification**

Please provide written clarification that the columns in the main waiting area are not being replaced, for the proposed renderings show that they are different column types. Please provide minimization alternatives – will portions of the benches in the concourse/pedestrian bridge be retained?

### **Consulting Parties/Potential Mitigation**

Our office will provide the following suggestion for potential mitigation; however please note that other consulting parties must be given the opportunity to provide input, and there needs to be some type of consideration of alternatives/minimization.

*Power Directors Room, Second Floor (control center)*

It is understood that this room and its contents will not be affected by the project. We would offer the suggestion that as mitigation the following would be done for the control center:

- A preservation assessment of the room/equipment
- Inventory of the equipment, with current and historic photographs, descriptions of function/use of the equipment; historic documents, plans, etc.
- Preservation measures as determined by the preservation assessment
- Oral interviews of former employees who worked at the control center
- A documentary or written narrative be produced detailing the role of the control center, new technology for the time, discussion of the changes in technology or railroad procedures that made this control room defunct, and how it related to the Harris Tower (did the control room replace the Harris Tower?), discussion of the employees/job descriptions, etc.

*Railroad Station*

We would offer the suggestion that as mitigation the following would be done for the Railroad Station

- Update the Historic Structures Report (done in 1980s) to include but not limited to the following:
  - Updated text, describing the changes that have occurred since the initial HSR was done
  - Updated photographs of the character-defining features, historical elements, fixtures, materials, etc.
  - Provide any future recommendations for the retention of character-defining features, historical elements, fixtures, materials, etc. or restoration/preservation needs

If you have questions, please contact Cheryl L. Nagle at 717.772.4519 or [chnagle@pa.gov](mailto:chnagle@pa.gov).

Sincerely,



Douglas C. McLearn, Chief  
Division of Archaeology and Protection

## Allen, Lindsey

---

**To:** Alfson, Mary  
**Subject:** RE: Harrisburg Transportation Center NHL

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**From:** Watson, Angela [<mailto:angelwatso@pa.gov>]  
**Sent:** Thursday, June 08, 2017 9:09 AM  
**To:** Koenig, Daniel (FTA) <[daniel.koenig@dot.gov](mailto:daniel.koenig@dot.gov)>  
**Cc:** Alfson, Mary <[MAlfson@jmt.com](mailto:MAlfson@jmt.com)>; Miller, Michael <[MMiller@jmt.com](mailto:MMiller@jmt.com)>; stepanko [pa.gov](mailto:pa.gov) <[stepanko@pa.gov](mailto:stepanko@pa.gov)>  
**Subject:** FW: Harrisburg Transportation Center NHL

Dan  
I received the response below from NPS accepting the consulting party invitation for HTC.

-Angela

**From:** [bonnie\\_halda@nps.gov](mailto:bonnie_halda@nps.gov) [[mailto:bonnie\\_halda@nps.gov](mailto:bonnie_halda@nps.gov)] **On Behalf Of** NHL NEReview, NPS  
**Sent:** Wednesday, June 07, 2017 4:52 PM  
**To:** Watson, Angela <[angelwatso@pa.gov](mailto:angelwatso@pa.gov)>  
**Subject:** Re: Harrisburg Transportation Center NHL

Dear Ms. Watson,

Thank you for contacting our office regarding the Harrisburg Transportation Center project, which involves the Harrisburg Station and Trainshed National Historic Landmark (NHL). We appreciate your notifying the National Park Service, on behalf of the Secretary of the Interior, of this undertaking, in accordance with 36 CFR Section 800.10(c) of the Advisory Council on Historic Preservation's "Protection of Historic Properties" regulations pursuant to Section 106 of the National Historic Preservation Act.

The Northeast Region of the National Park Service wishes to be a consulting party in your Section 106 consultations.

I appreciate that you notified our office a second time; I was unable to find a record of receiving a notification in January. Please continue to use this email to submit more detailed information about the project as it becomes available.

I will be the point of contact for the review. You may reach me through this email, or at 215-597-5028. I look forward to learning more about the project.

Bonnie Halda

Program Manager, Preservation Assistance

-----  
Preservation Assistance  
National Park Service - Northeast Regional Office  
200 Chestnut Street  
Philadelphia, PA 19106  
215-597-1578

On Tue, May 16, 2017 at 5:01 PM, Watson, Angela <[angelwatso@pa.gov](mailto:angelwatso@pa.gov)> wrote:

Good afternoon,

The intent of this email is to provide notification to the National Park Service of a proposed project involving a National Historic Landmark.

The Pennsylvania Department of Transportation (PENNDOT), with the Federal Transit Administration (FTA) as the lead Federal agency, is undertaking a Federally-funded project. As a Federal undertaking, the project is subject to Section 106 of the National Historic Preservation Act (NHPA) of 1966, as amended, and the associated implementing regulations. In addition, the project involves the Pennsylvania Railroad: Harrisburg Station and Trainshed, which is a National Historic Landmark, requiring additional coordination under Section 110 of the NHPA.

In order to enhance customer experience at the Harrisburg Transportation Center (HTC), to increase use of underutilized spaces within the existing station, and to attract tenants to transform the HTC into a center for redevelopment in the area, FTA and PENNDOT agreed to repair and renovate the station (the "Project"). PENNDOT plans to improve various aspects of the HTC. These proposed improvements include, but are not limited to: enhancing overall ADA accessibility and passenger flow, improving customer comfort, re-purposing inadequate and underutilized or unoccupied spaces, maintaining a state of good repair, and modernizing general building systems and other supporting infrastructure. The project will include repairs and improvements to the building exterior, interior public spaces including the main waiting area and pedestrian bridge/concourse, interior retail and tenant spaces on all levels, and site improvements for passenger and patron experience and accessibility.

We previously sent an invitation by letter to consult on January 5, 2017, but did not receive a response. As recommended by the SHPO, we are providing the attached information for your review and comment.

Please do not hesitate to reach me via email or the phone number below. Thank you.

**Angela Watson, AICP**

Multimodal Planning | Multimodal Deputate Office

Pennsylvania Department of Transportation

400 North Street - 8th Floor | Harrisburg, PA 17120

Phone: 717.705.1318

Cell: 717.461.6248

[www.penndot.gov](http://www.penndot.gov)



## Appendix C: Preferred Alternative Engineering



## Appendix D: Memorandum of Agreement (MOA)

MEMORANDUM OF AGREEMENT  
AMONG  
THE FEDERAL TRANSIT ADMINISTRATION (FTA),  
PENNSYLVANIA DEPARTMENT OF TRANSPORTATION (PENNDOT)  
AND THE  
THE PENNSYLVANIA STATE HISTORIC PRESERVATION OFFICER (PASHPO),  
PURSUANT TO 36 CFR § 800.6(b)(1)  
REGARDING THE HARRISBURG TRANSPORTATION CENTER FACILITY UPGRADES IN THE  
CITY OF HARRISBURG, PENNSYLVANIA

WHEREAS, the Pennsylvania Department of Transportation (PennDOT) proposes to renovate the existing Harrisburg Transportation Center in order to enhance overall ADA accessibility and passenger flow, improve customer comfort, re-purpose inadequate and underutilized or unoccupied spaces, maintain a state of good repair, and modernize general building systems and other supporting infrastructure (the Project), as more fully described in Attachment A; and

WHEREAS, the Federal Transit Administration (FTA) plans to provide funding assistance for the Project, thereby making it an undertaking subject to review under Section 106 of the National Historic Preservation Act (NHPA), 54 U.S.C. Part 306108, and its implementing regulations, 36 CFR Part 800; and

WHEREAS, the Pennsylvania Railroad: Harrisburg Station and Trainshed was listed in the National Register of Historic Places in 1975 and designated a National Historic Landmark in 1976, and subsequently the following elements of the Pennsylvania Railroad: Harrisburg Station and Trainshed were determined contributing elements to the resource: brick construction, long horizontal massing, wood windows, window awnings, dormer windows, first-floor overhang, both metal truss train sheds, interior finishes in the main waiting area (fireplace, coffered ceiling, mosaic tile floor), the wall between the waiting area and concourse/pedestrian bridge, the partial-height wall and wood benches in the concourse/pedestrian bridge, the second and third story office space dating to the Pennsylvania Railroad office use; and

WHEREAS, FTA has determined that the Undertaking will have an adverse effect on the Pennsylvania Railroad: Harrisburg Station and Trainshed; and

WHEREAS, FTA has consulted with the PASHPO pursuant to 36 CFR Part 800; and

WHEREAS, due to the status of the property as a National Historic Landmark, the FTA has notified the National Park Service (NPS) of the proposed undertaking and invited the NPS to participate in consultation, which NPS accepted by email of June 7, 2017; and

WHEREAS, FTA identified and invited the following entities to review and comment on the Undertaking and become Consulting Parties as part of the Section 106 process: Harrisburg City Council, Harrisburg Planning Bureau, the Redevelopment Authority of Harrisburg, Harrisburg Historic Architectural Review Board (HARB), County Commissioner Jeff Haste, County Commissioner Mike Pries, County Commissioner George P. Hartwick III, Tri-County Regional Planning Commission, the Historical Society of Dauphin County, Historic Harrisburg Association, Inc., National Railway Historical Society, Pennsylvania Railroad Technical and Historic Society – Middle Division Chapter, Pennsylvania Railroad Technical and Historic Society – North Central Chapter, Reading Company Technical and Historical Society, Inc., Senator Rob Teplitz, Representative Patty Kim, National Railroad Passenger Corporation (Amtrak), and National Park Service Northeast Region; and the PASHPO, Amtrak and the Harrisburg

HARB requested to participate; and

WHEREAS, in accordance with 36 CRF 800.6(a)(1), FTA has notified the Advisory Council on Historic Preservation (ACHP) of its adverse effect determination and provided the specified documentation, and the ACHP has declined by letter dated June 9, 2017 to participate in the consultation pursuant to 36 CFR 800.6(a)(1)(iii); and

WHEREAS, FTA and PennDOT have explored options to avoid the adverse effect and have concluded that such options are not practicable, as discussed in the Determination of Effects Report issued in June of 2017 for this Undertaking. The adverse effects to the resource include: opening three of the six arched window/door openings in the wall between the main waiting area and the concourse/pedestrian bridge, the removal of a portion of the center wall that extends down the center of the concourse/pedestrian bridge, and the alteration of the second and third floor of the station; and

WHEREAS, FTA and PennDOT have consulted with the PASHPO, NPS, Amtrak, and Harrisburg HARB, in accordance with Section 800.6(b) of the NHPA's regulations to seek ways to avoid, minimize, or mitigate the potential adverse effects of the Undertaking, and all Parties have agreed on how the adverse effects will be resolved and concur on executing this Memorandum of Agreement (MOA) to set forth those resolutions; and

WHEREAS, all actions will occur in areas disturbed by previous construction, and thus no archaeological investigations are necessary for the proposed project; and

WHEREAS FTA, PennDOT, and the PASHPO agree that the Undertaking shall be implemented in accordance with the terms and conditions set forth herein in order to take into account and address the adverse effect of the Undertaking on historic properties.

NOW THEREFORE, the Parties agree as follows:

### **Stipulations**

PennDOT shall ensure the implementation of the following stipulations:

- 1) PennDOT hereby agrees and guarantees that the final selection of materials, design, and repair techniques for the window repairs will be coordinated with the PASHPO, FTA, and the consulting parties. Plans will be provided via email to all signatories and consulting parties at the 60 and 90% phases of the project. All parties will have 30 days to review the plans and provide comments.
- 2) PennDOT hereby agrees and guarantees that it will provide digital copies of the historic and current photographs to all consulting parties at their request of those areas where significant changes will occur (where such historic photographs are available). This will include photographs of the arched openings, the concourse/pedestrian bridge, and the 2<sup>nd</sup> and 3<sup>rd</sup> floors. Current and historic photos will also be incorporated into the Historic Structures Report.
- 3) PennDOT hereby agrees and guarantees that the following activities will be completed to record and interpret the history, fabric, and function of the *Power Directors Room, Second Floor*:

- a. An inventory of the room and the equipment will be completed. This will include a

physical inventory of the equipment, current and historic photos (where available), descriptions of the function and use of the equipment (when known), and any historic documents and/or plans that are available.

- i. The information gathered will be included in the Historic Structures Report (see Stipulation 4), as appropriate; and
- ii. The information will be used to prepare a document for public dissemination that focuses on the historic use and function of the Control Room. The focus of the public document will be the role of the Control Room in the daily operations of the railroad, the technology used, the changes in technology and how they rendered the Control Room obsolete, and a discussion of the employees' jobs (via oral interviews if possible). The format of the public document will be determined in consultation with the Consulting Parties after it has been determined what resources are available regarding the Control Room and if former employees/railroad experts can be found who are willing to be interviewed. The format will be one of the following:
  1. A booklet – to be available in both printed and digital format. The booklet will be between 15-20 pages in length and will feature illustrations and photographs to help explain the function of the Control Room; or
  2. A short video documentary (10-15 minutes) featuring interviews with former employees/railroad experts describing the function and daily use of the Control Room.

4) PennDOT hereby agrees and guarantees that an update to the 1980s Historic Structures Report (HSR) will be completed for the Railroad Station. This will include updating the text to discuss changes made since the initial HSR. Updated photographs will include all character defining features, historical elements, fixtures, materials, etc. The updated HSR will include recommendations for the retention of character defining features, historic elements, restoration/preservation needs, etc.

5) PennDOT will provide any inventory, reports, or videos produced as a result of Stipulations 3 and 4 will be provided to Amtrak, PA SHPO, and other consulting parties for review and comment. Amtrak, PA SHPO and other consulting parties will provide any comments to said documentation or videos within thirty days. PennDOT will provide copies of all final inventories, reports, or videos produced as a result of Stipulations 3 and 4 to Amtrak, PA SHPO and other consulting parties.

## **Administrative Conditions**

### **A. Personnel Qualifications**

PennDOT shall ensure that all work carried out pursuant to this MOA is carried out by or under the direct supervision of a person or persons meeting at a minimum the *Secretary of the Interior's Professional Qualification Standards* (48 FR 44738-9), and that all historic preservation work is carried out by or under the direct supervision of a person or persons meeting at a minimum the *Secretary of the Interior's Professional Qualification Standards for Architectural History* (48 FR 44738-9).

### **B. Post Review Discoveries**

If any unanticipated discoveries of historic properties or archaeological sites are encountered during the implementation of this undertaking, PennDOT shall comply with 36 CFR 800.6(c)(6) by consulting with the FTA and the PASHPO and, if applicable, Federally recognized tribal organizations that attach religious and/or cultural significance to the affected property; and by developing and implementing actions with the concurrence of the FTA and the PASHPO and, in consultation with participating Consulting Parties, and if applicable, Federally recognized tribal organizations.

#### C. Amendments

Any party to this MOA may propose to FTA that this MOA be amended, whereupon FTA shall consider such an amendment.

#### D. Dispute Resolution

1. Should any Signatory object in writing to the FTA regarding any actions carried out or proposed with respect to the Harrisburg Transportation Center Preliminary Design Project or implementation of this MOA, the FTA shall consult with the objecting party to resolve the objection. If after initiating such consultation the FTA determines that the objection cannot be resolved through consultation, the FTA shall forward all documentation relevant to the objection to the ACHP, including the FTA proposed response to the objection. Within 30 days after receipt of all pertinent documentation, the ACHP shall exercise one of the following options:

- a) Advise the FTA that the ACHP concurs in the FTA proposed response to the objection, whereupon the FTA shall respond to the objection accordingly;
- b) Provide the FTA with recommendations, which the FTA shall take into account in reaching a final decision regarding its response to the objection; or
- c) Notify the FTA that the objection will be referred for comment pursuant to 36 CFR § 800.7, and proceed to refer the objection and comment. The resulting comment shall be taken into account by the FTA in accordance with 36 CFR § 800.7(c)(4).

2. Should the ACHP not exercise one of the above options within thirty (30) days after receipt of all pertinent documentation, the FTA may assume the Council's concurrence in its proposed response to the objection.

3. The FTA shall take into account any ACHP recommendation or comment provided in accordance with this stipulation with reference only to the subject of the objection; the FTA responsibility to carry out all actions under this MOA that are not the subjects of the objection shall remain unchanged.

#### E. Monitoring and Reporting

Each year following the execution of this MOA until it expires or is terminated, PennDOT shall provide Signatories to this MOA a summary report detailing work carried out pursuant to its terms. Such report shall include any scheduling changes proposed, any problems encountered, and any disputes and objections received in PennDOT's efforts to carry out the terms of this MOA.

#### F. Duration

If the terms of this MOA have not been implemented by five (5) years from the date of this signed MOA, this MOA shall be considered null and void. In such an event, FTA shall notify PennDOT, the PASHPO, and the Consulting Parties if it chooses to continue with the project, it shall re-initiate review of the project pursuant to 36 CFR 800.

G. Termination

1. If PennDOT determines that it cannot implement the terms of this MOA, or if the FTA or PASHPO determines that the MOA is not being properly implemented, FTA or the PASHPO may propose that this MOA be terminated.
2. The party proposing to terminate this MOA shall so notify all parties to this MOA, explaining the reasons for termination and affording them at least 30 days to consult and seek alternatives to termination. The parties shall then consult.
3. Should such consultation fail, FTA, PennDOT or the PASHPO may terminate the MOA by so notifying all parties.

Execution of this MOA by FTA, PennDOT, and the PASHPO and implementation of its terms, is evidence that FTA has satisfied its responsibilities under 36 CFR § 800, for the project and has consulted and sought the advice of the PASHPO, NPS, and other Consulting Parties.

FEDERAL TRANSIT ADMINISTRATION (FTA)

By: \_\_\_\_\_ Date: \_\_\_\_\_

PENNSYLVANIA DEPARTMENT OF TRANSPORTATION (PENNDOT)

By: \_\_\_\_\_ Date: \_\_\_\_\_

PENNSYLVANIA STATE HISTORIC PRESERVATION OFFICE (PASHPO)

By: \_\_\_\_\_ Date: \_\_\_\_\_

Concurring Parties:

NATIONAL PARK SERVICE

By: \_\_\_\_\_ Date: \_\_\_\_\_

HARRISBURG HISTORIC ARCHITECTURAL REVIEW BOARD (HARB)

By: \_\_\_\_\_ Date: \_\_\_\_\_

NATIONAL RAILROAD PASSENGER CORPORATION (AMTRAK)

By: \_\_\_\_\_ Date: \_\_\_\_\_

DRAFT

## **Attachment A**

The proposed project entails enhancing overall ADA accessibility and passenger flow, improving customer comfort, repurposing inadequate and underutilized or unoccupied spaces, maintaining a state of good repair, and modernizing general building systems and other supporting infrastructure.

### Exterior Building Repairs

- General repairs, repointing, and cleaning to the brick and masonry façade, repair/replacement of existing windows.
- Repair/replacement of the station roof systems and skylights.
- Parking and walkway areas of the HTC facility site would be improved to meet minimum requirements for site accessibility.
- Cooling tower replacement.
- New outdoor seating plaza.

### Interior Building Repairs

#### *First Floor Public Restrooms Renovations*

- Complete renovation to comply with current building code and ADA standards.
- New restrooms will encompass all the existing restroom space as well as the adjacent Amtrak offices, which will be relocated within the north end of the first floor.

#### *First Floor Tenant and Office Space (northern section of station)*

- Reconfigure space with new Amtrak Administration and Amtrak Police Offices, training rooms, and bathrooms displaced from the main waiting area reconfiguration.
- New programming could include retail and/or restaurant space support space for the Observation Room.

#### *Observation Room Renovations*

- Improvements would include new flooring, ceiling upgrades, new glass curtain wall, adjacent storage space(s), A/V system, new lighting, and new HVAC.

#### *Main Waiting Area Improvements*

- The 1980s Amtrak Police Station structure will be removed.
- A retail counter will be installed between the two main entry doors.
- The modern vestibules added at two of the main doors will be removed.
- Three of the six openings between the main waiting area and waiting area extension (which leads to the pedestrian bridge/concourse) would be removed to create an open and continuous space.

#### *Concourse Repairs*

- Basic updates and repairs include painting, cosmetic/finish repairs, ceilings repairs, and lighting and energy efficiency upgrades.
- Remove the center partial-height wall and seating area and replace with various seating options.

#### *Second and Third Floor Renovations*

- New and upgraded separate access to support potential space upgrades to the second and third floors.
- Improvement to the second and third floor would focus on a more efficient utilization of the existing space. Upgrading would result in marketable Class A/B office space/flex space.