

Area of Potential Effect Report
Southeastern Pennsylvania Transportation
Authority (SEPTA)

King of Prussia Rail, Extension of the Norristown
High Speed Line



Upper Merion Township, Montgomery County, and
Upper Darby Township, Delaware County, Pennsylvania
ER# 2013-1006-091

Prepared for:



Southeastern Pennsylvania Transportation Authority
1234 Market Street
Philadelphia, PA 19107

Prepared By:



625 West Ridge Pike, Suite E-100
Conshohocken, Pennsylvania 19428

January 2016

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Southeastern Pennsylvania
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1234 Market Street
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January 2016

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1.0 INTRODUCTION

The Federal Transit Administration (FTA), in cooperation with the Southeastern Pennsylvania Transportation Authority (SEPTA), is preparing a Draft Environmental Impact Statement (DEIS) under the National Environmental Policy Act of 1969 (NEPA) that examines and evaluates a proposed extension of the existing Norristown High Speed Line (NHSL) to the King of Prussia area, known herein as the King of Prussia (KOP) Rail project. Since this project will be federally funded, it constitutes a “federal undertaking” and is subject to review under Section 106 of the National Historic Preservation Act of 1966 (NHPA), as amended, and the implementing regulations, 36 CFR Part 800. Under Section 106, the impacts of any undertaking on historic properties within the Area of Potential Effect of the undertaking must be evaluated. Historic properties are defined as “any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion on the National Register of Historic Places.”

This Area of Potential Effect Report was prepared to support the DEIS under NEPA and is also an element of SEPTA’s consultation under Section 106 of the NHPA. This report defines the proposed Area of Potential Effect (APE) for cultural resources in proximity to the likely preferred alternative. The methodology consisted of preliminary background research, as well as field reconnaissance to assess the proximity of historic resources to the project area and the overall visibility of the proposed work.

Section 106 consultation was initiated with the Pennsylvania Historical and Museum Commission (PHMC) in March 2013. In their April 4, 2013 response, included in Appendix A of this document, PHMC requested to review a list of potential consulting and interested parties for the project. A list of potential consulting parties is included within this document. As the Section 106 process for the project continues, FTA and SEPTA will invite consulting parties to participate in the process and will seek input from those parties to inform the process and decision-making. The purpose of this report is to describe the KOP Rail project, provide an APE for review and approval by the PHMC, and submit a proposed list of consulting parties.

2.0 PROJECT DESCRIPTION

2.1 King of Prussia Rail Extension

The purposes of the proposed project are to provide faster, more reliable, public transit service that:

- Offers improved transit connections to the King of Prussia-Valley Forge area from communities along the existing Norristown High Speed Line, Norristown and Philadelphia;
- Improves connectivity between major destinations within the King of Prussia-Valley Forge area; and
- Better serves existing transit riders and accommodates new transit patrons.

The project need stems from deficiencies of current transit services in terms of long travel times, delays due to roadway congestion, required transfers leading to two or more seat trips, and destinations that are underserved, or currently not served, by public transit. These needs are strengthened by growing population and employment, concentrations of major commercial development in King of Prussia, and significant planned commercial, industrial, and residential development for the area.

The DEIS documents SEPTA's process for developing and evaluating alternatives to address the project purpose, including a No Action Alternative, a preliminarily recommended Likely Preferred Alternative, and other alternatives. In Section 106 consultation for the KOP Rail project, the focus is on the Likely Preferred Alternative and the No Action Alternative described below.

2.1.1 No Action Alternative

The No Action Alternative assumes no improvements to the transportation system in the study area other than those contained in the financially constrained element of *Connections 2040 Plan for Greater Philadelphia*, the long-range transportation plan of the Delaware Valley Regional Planning Commission. The No Action Alternative projects consist primarily of planned capacity and operational improvements to regional and local study area roadways, particularly US 422 and the Pennsylvania Turnpike. In addition to these planned projects, the No Action Alternative consists of transit service levels, highway and transit networks, traffic volumes, and forecasted demographics for the horizon year 2040.

2.1.2 Likely Preferred Alternative

SEPTA's Likely Preferred Alternative was identified as a result of a rigorous screening process during development of the DEIS. Ultimately, it was identified for a combination of reasons:

- Number of stations within Upper Merion Township-designated Mixed Use Transit-Oriented Development areas
- Service to areas with the most redevelopment potential
- Service to areas with ease of new zoning
- Access to jobs
- Least number of full residential acquisitions
- Least potential for visual effects
- Ridership

- Capital and operations and maintenance costs
- Broad acceptance by key stakeholders and political leaders

The Likely Preferred Alternative, known in the DEIS as PECO/TP-1st Ave., would provide a new railroad line extending roughly west from the existing Norristown High Speed Line (NHSL) and terminating near the intersection of First Avenue and North Gulph Road at the Valley Forge Casino & Convention Center (VFCCC) (Figure 1).

The Likely Preferred Alternative would use portions of the PECO electric utility corridor and PA Turnpike as its trunk, passing behind (to the north of) the KOP Mall, turn north to use a portion of the Norfolk Southern (NS) Industrial Track before turning west along First Avenue as its branch and ending near the intersection of First Avenue and North Gulph Road near the VFCCC.

As part of the Likely Preferred Alternative, two tracks would be provided on primarily elevated guideway. However, the tracks would be at grade in the turnoffs adjacent to the existing NHSL and on a hilltop area within the PECO corridor a short distance west of Henderson Road. The at-grade and elevated guideway sections are shown in Figure 4. The route includes five station areas, including Henderson Road, the Court, Mall Boulevard North, First Avenue East, and the terminal station 1st & Moore. The Henderson Road and 1st & Moore stations would include park-and-ride facilities, currently configured as a surface lot at the Henderson Road station and a multi-story garage structure at 1st & Moore.

As the elevated guideway approaches the western terminal station, 1st & Moore station, the two-track guideway structure would widen from approximately 34 feet to a three-track cross-section approximately 50 feet wide. In the widened area, the third track would provide SEPTA with the necessary track capacity for efficient train operations at the terminal station and along the Likely Preferred Alternative alignment.

Due to the ground topography and alignment curves between the First Avenue East and 1st & Moore station areas, SEPTA standards can be achieved by raising the guideway elevation up to approximately 6.5 feet higher than the typical 17-foot guideway height over ground level elsewhere along the Likely Preferred Alternative alignment.

In the Likely Preferred Alternative, extending NHSL service into King of Prussia would require SEPTA to add one new station track at SEPTA's 69th Street Transportation Center in Upper Darby Township, Delaware County (Figure 2). The new track would be aligned along the north side of the existing NHSL tracks, stopping at the existing building along the north side of the existing northern platform. The ballast embankment supporting the existing NHSL tracks would be widened to the north to accommodate the new track. Adjacent to the northern platform, the new track would be supported on an elevated guideway structure. The purpose of using structure rather than continuing the embankment up to the building is to avoid impacting the existing bus stop and turnaround area underneath and adjacent to the new track.

The northern platform would be widened to serve the new track. As with the existing NHSL service, the new track and widened platform would be designed to enable level passenger boarding. The existing windbreak wall along the northern edge of the existing platform would be removed and rebuilt along the northern edge of the proposed guideway structure. Elements to be removed include a short section of existing turnout track along the proposed alignment as well as an existing stairway used by passengers exiting from the north platform and by SEPTA

personnel. The existing track embankment retaining wall would be relocated to the north edge of the new embankment and the existing track turnout would be replaced. Other portions of the 69th Street Transportation Center would not be affected or changed by the proposed project

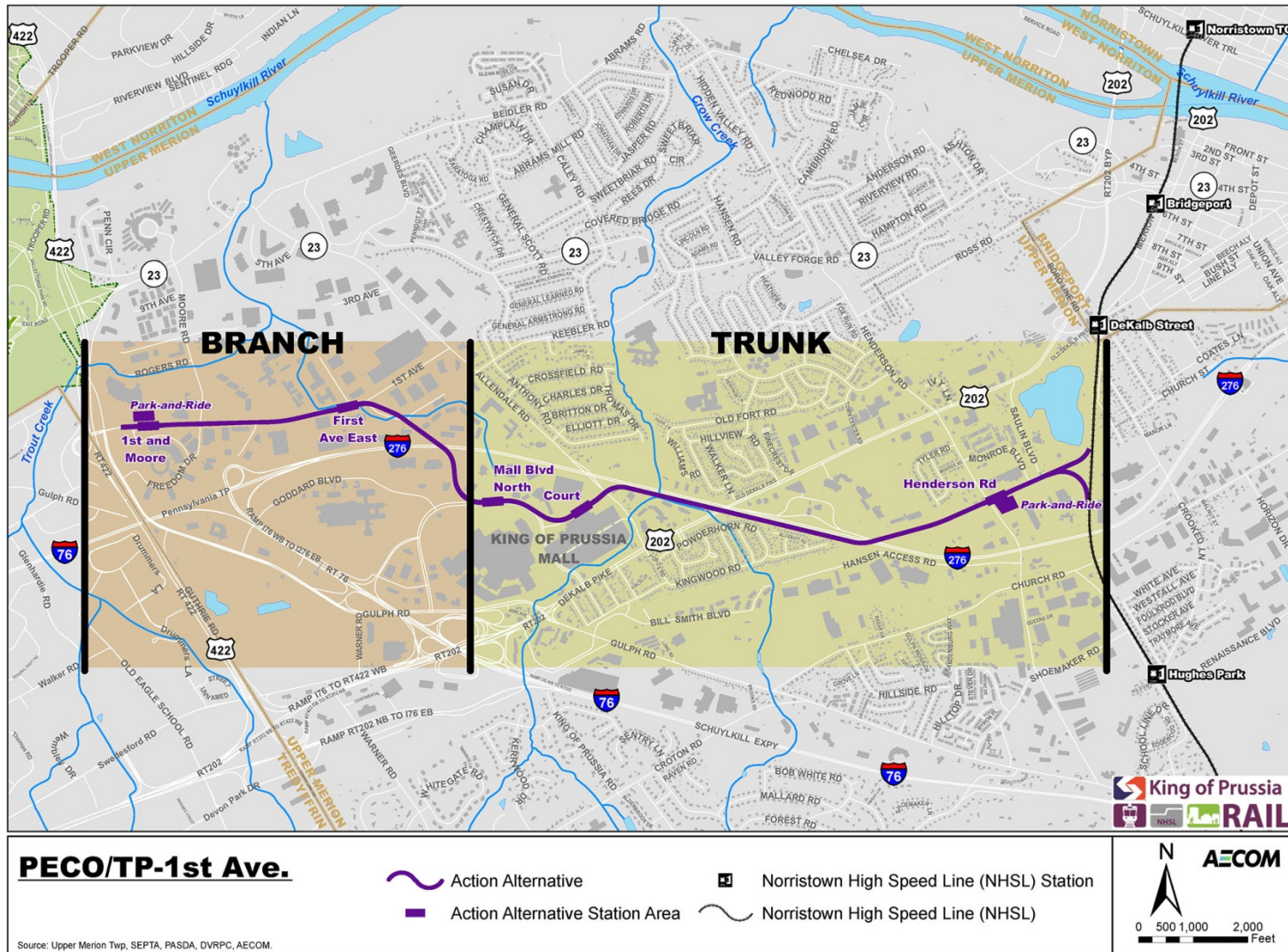


Figure 1. Likely Preferred Alternative in Upper Merion Township, Montgomery County.

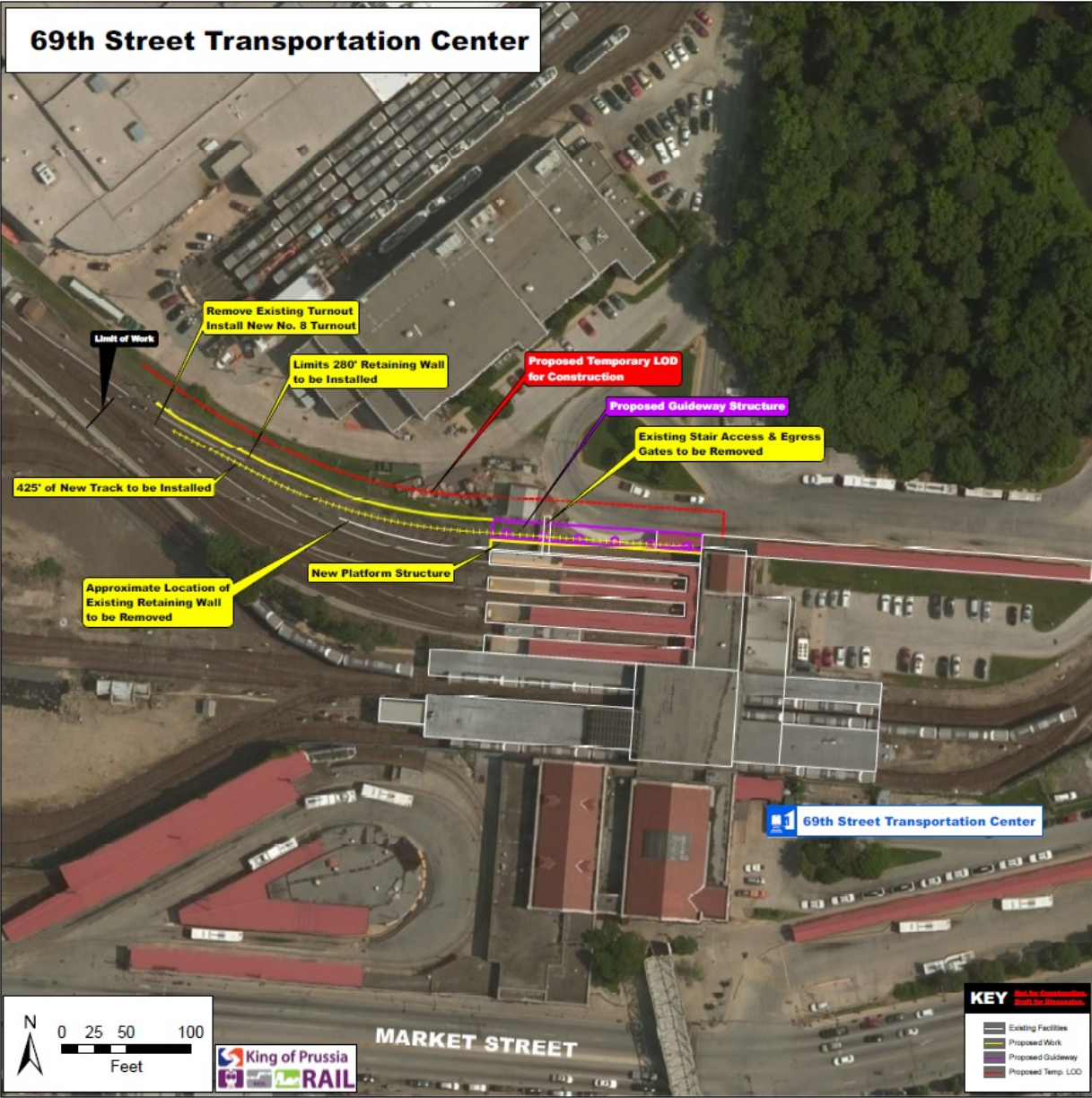


Figure 2. Proposed work for the Likely Preferred Alternative at the 69th Street Transportation Center, Upper Darby Township, Delaware County.

3.0 AREA OF POTENTIAL EFFECT

3.1 Likely Preferred Alternative

The Area of Potential Effect for cultural resources (archaeology and historic architecture) under Section 106 is shown in Figures 3 through 5.

3.2 Area of Potential Effect for Archaeological Resources

The APE for archaeology includes all locations where ground disturbance activities are proposed for the Likely Preferred Alternative in Upper Merion Township and at the 69th Street Transportation Center. The APE for archaeology includes proposed workspaces, the surface park-ride lot, elevated guideway structure, tracks, stations, permanent right-of-way, and other associated infrastructure.

3.3 Area of Potential Effect for Historic Architectural Resources

The APE for historic architectural resources in Upper Merion Township extends 500 feet on either side of the centerline of the proposed route between the existing NHSL and the western terminus on First Avenue (Figures 3 and 4). This boundary encompasses all proposed infrastructure, including guideways, bridges, stations, park-ride facilities, and access roads.

The APE for historic architectural resources at the 69th Street Transportation Center in Upper Darby Township extends 100 feet from either side of the centerline of the proposed additional track section.

3.4 Justification

3.4.1 Archaeology

The APE for archaeology is delineated to include all components of the project which have the potential to impact archaeological resources.

3.4.2 Historic Architecture

The historic architecture APE for the Likely Preferred Alternative was determined in relation to the character of the proposed work. The Upper Merion Township section of the project would involve construction of all-new infrastructure, including stations and elevated guideways. The new line, for the most part, does not follow an existing rail corridor and would create a highly visible change in the landscape. As such, an APE extending 500 feet on either side of the centerline of the route was deemed appropriate. This APE encompasses the area within which the project may cause changes in the character or use of standing resources listed in or eligible for the National Register of Historic Places (NRHP). The APE also includes resources from which the project may be visible and/or create a visual impact to the integrity of a listed or eligible resource.

The eastern edge of the APE in Upper Merion Township follows the alignment of the existing NHSL. The two proposed Likely Preferred Alternative turnoffs would run at grade to the west of the NHSL for approximately 500 feet. It is anticipated that there would be no visual impacts on properties to the east of the NHSL from the project, due to the at-grade turnoffs being screened from view behind the elevated NHSL.

The APE for the 69th Street Transportation Center improvements was based upon the relatively low profile of the work proposed. The project area is an existing rail corridor and the undertaking consists of a short additional track within that corridor, as well as related station improvements. Due to topography and the height/density of existing buildings in proximity to the track area to be improved, the proposed improvements have limited or no visibility from the surrounding area. An APE of 100 feet was thus deemed appropriate.

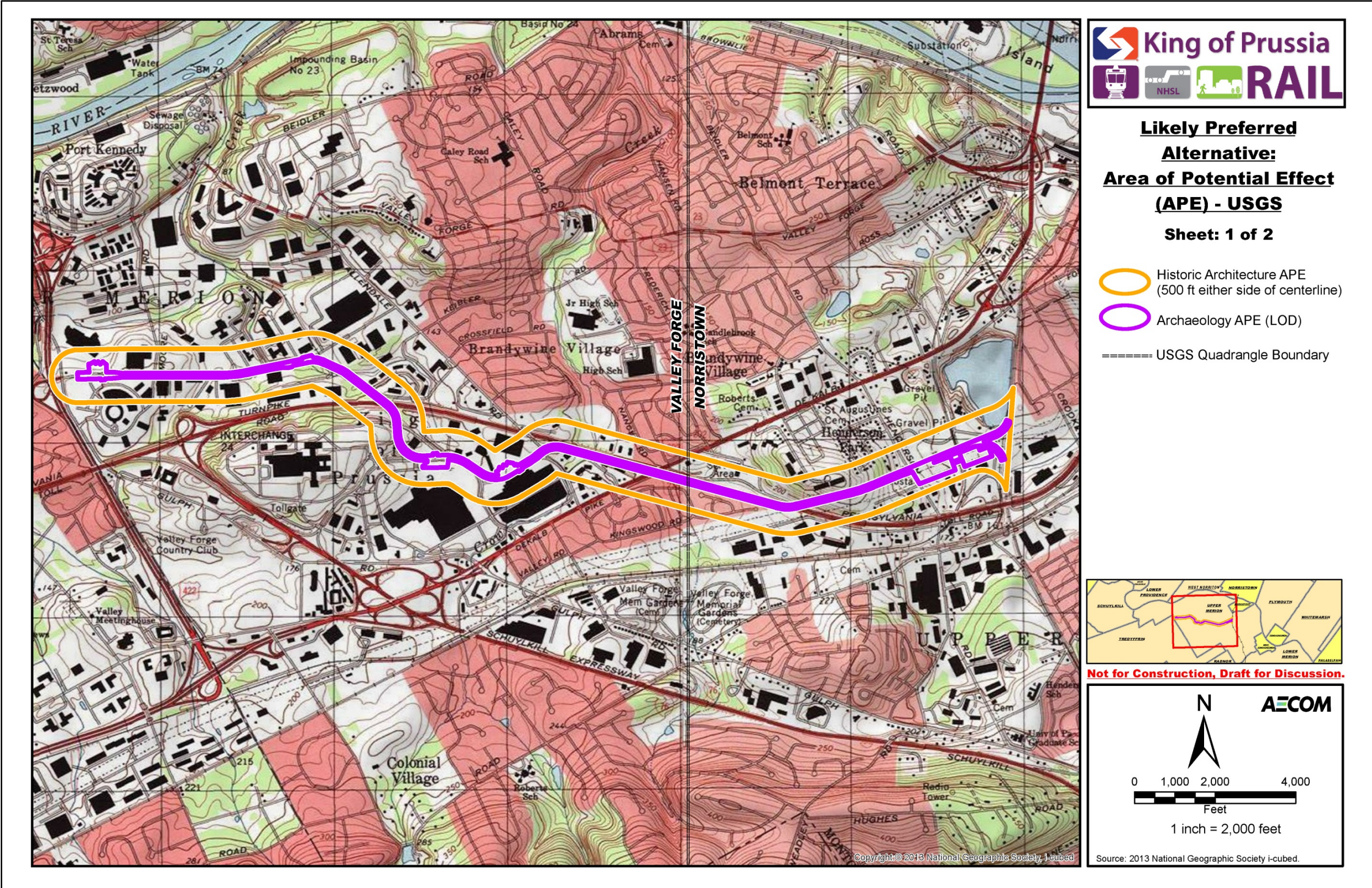


Figure 3-1. Area of Potential Effect for cultural resources in Upper Merion Township, Montgomery County (USGS 1992).

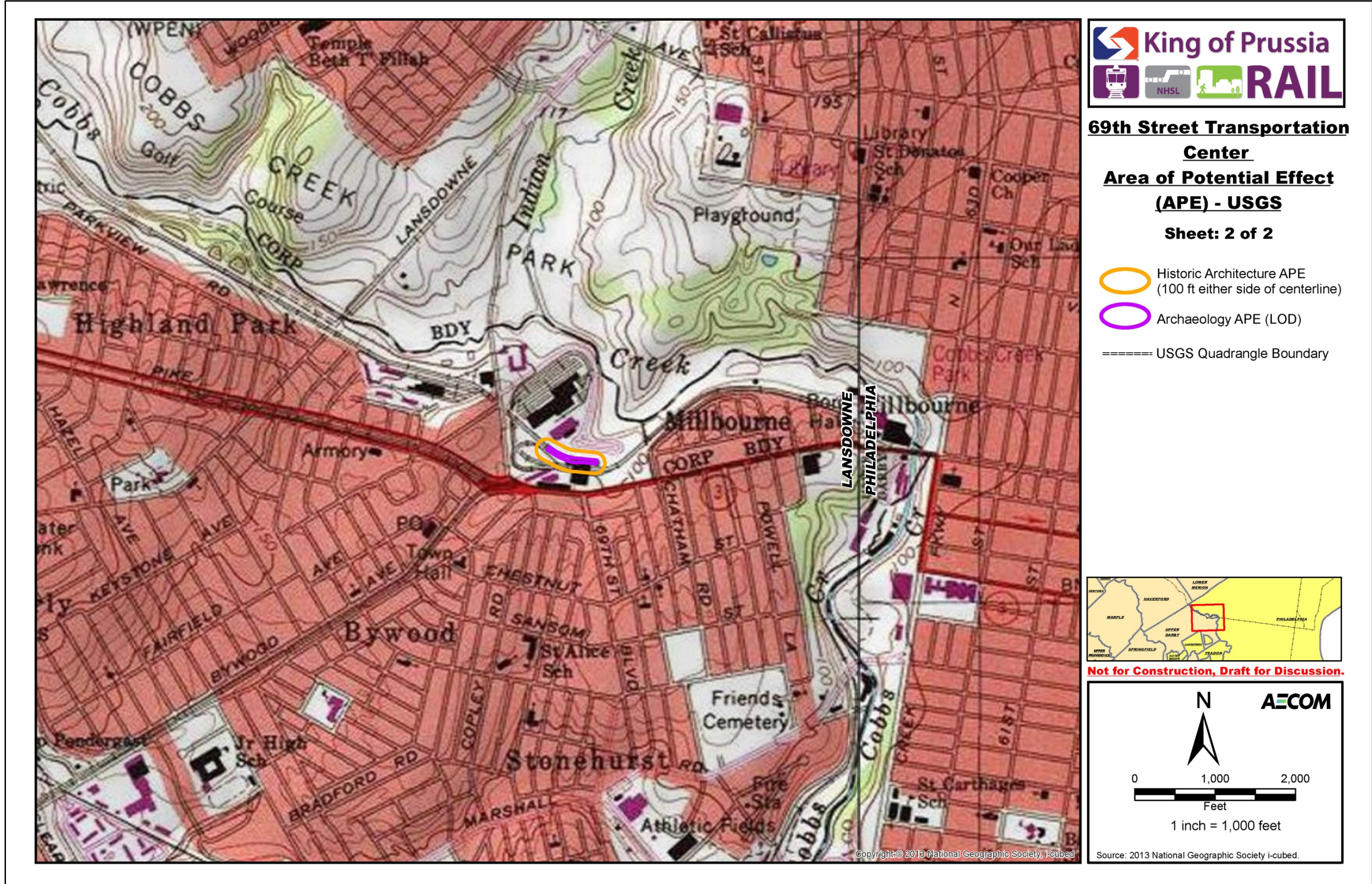
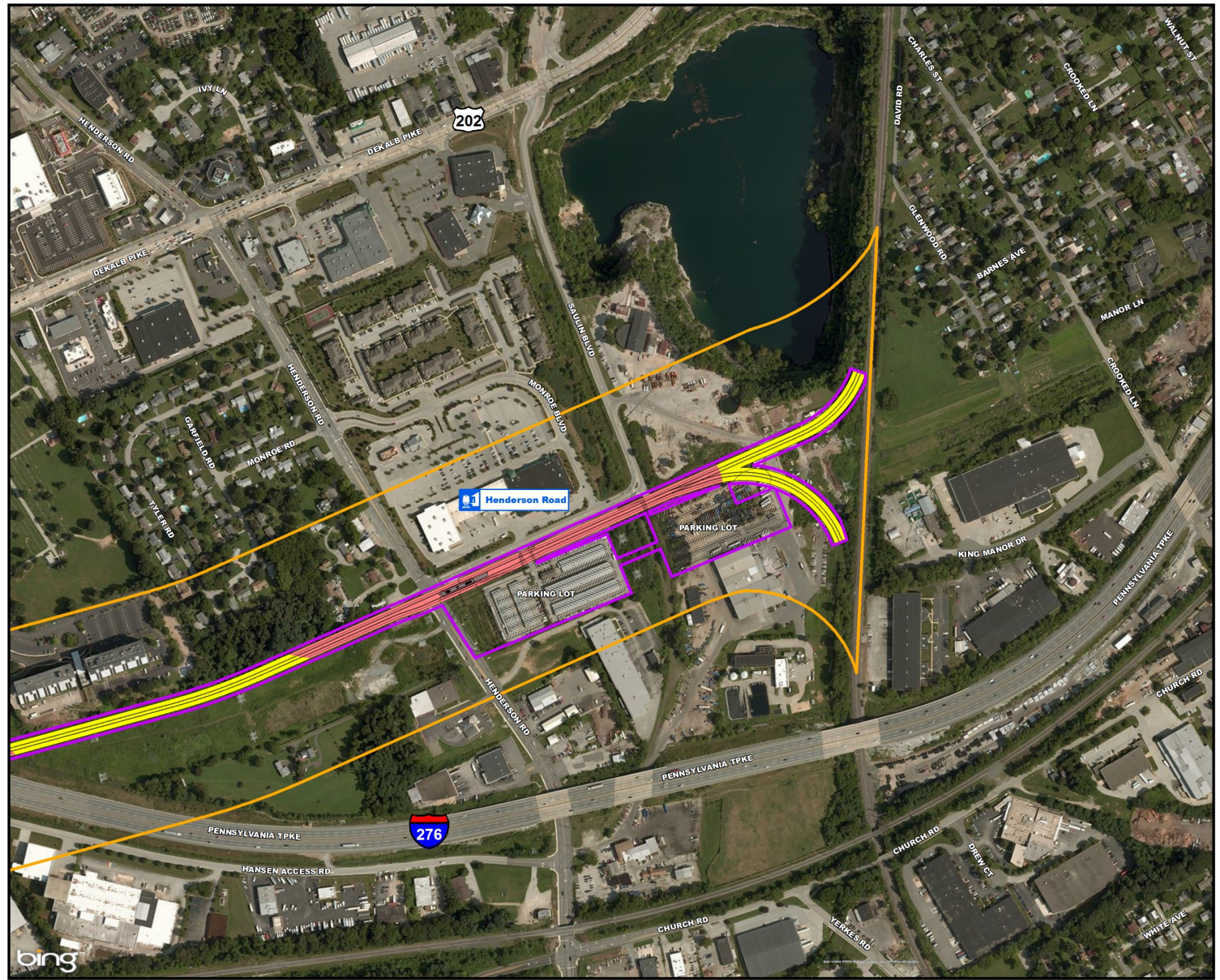









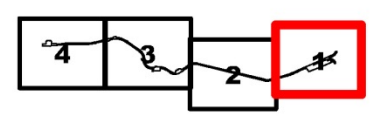
Figure 3-2. Area of Potential Effect for cultural resources at the 69th Street Transportation Center in Upper Darby Township, Delaware County (USGS 1967).



**Likely Preferred
Alternative:
Area of Potential Effect
(APE)
Sheet: 1 of 4**

-  Historic Architecture APE (500 ft either side of centerline)
-  Archaeology APE (LOD)


- Permanent ROW
-  Aerial Structure
 -  At-Grade
 -  Retained Fill
 -  Platform
-  Station Name Station Name



Not for Construction, Draft for Discussion.

AECOM

N



0 200 400 800
Feet

1 inch = 400 feet

Source: USGS Earthstar Geographics SIO.
2015 Microsoft Corp.

Figure 4-1. Area of Potential Effect for cultural resources along the Likely Preferred Alternative in Upper Merion Township, Montgomery County.

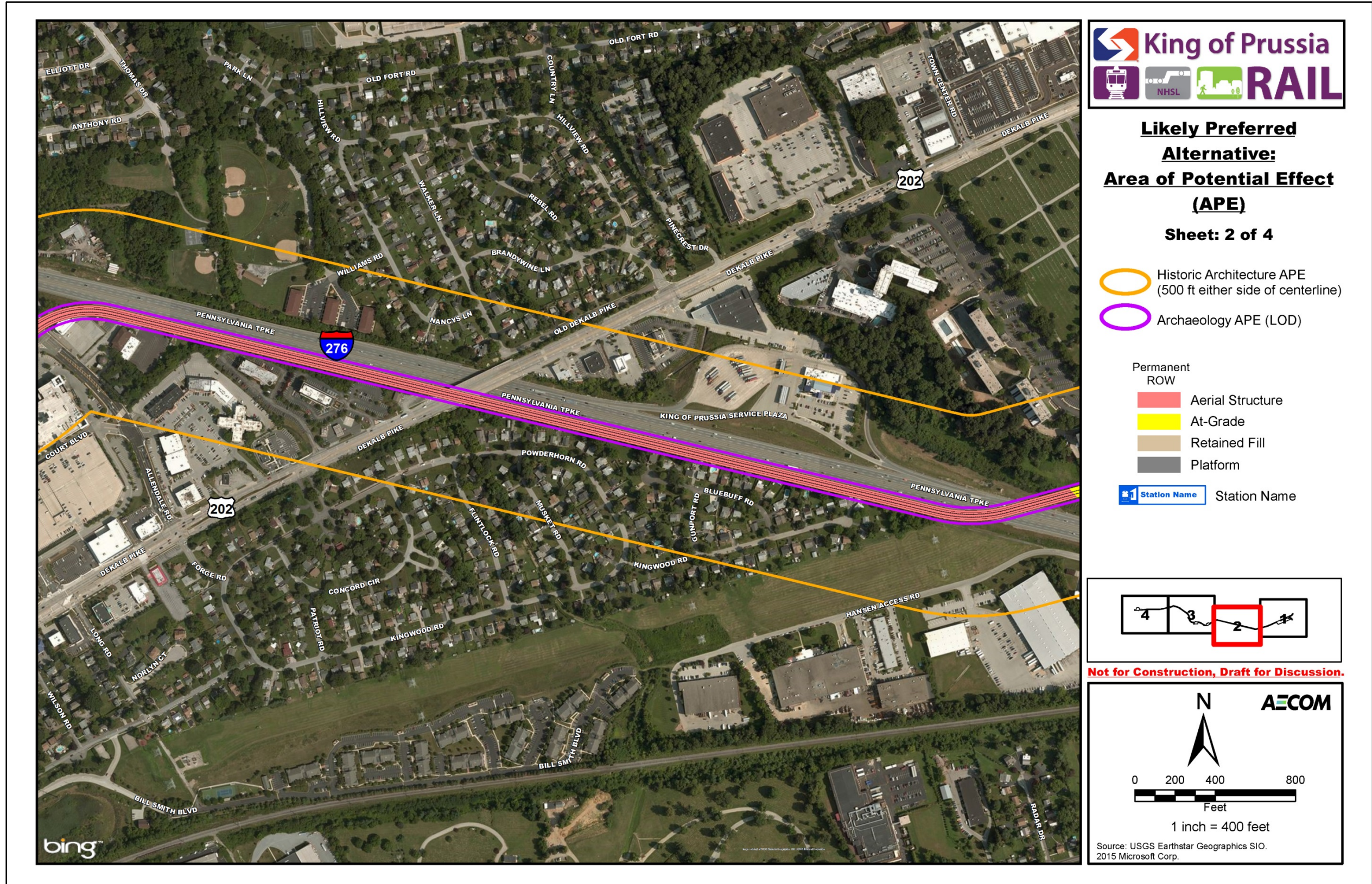


Figure 4-2. Area of Potential Effect for cultural resources along the Likely Preferred Alternative in Upper Merion Township, Montgomery County.

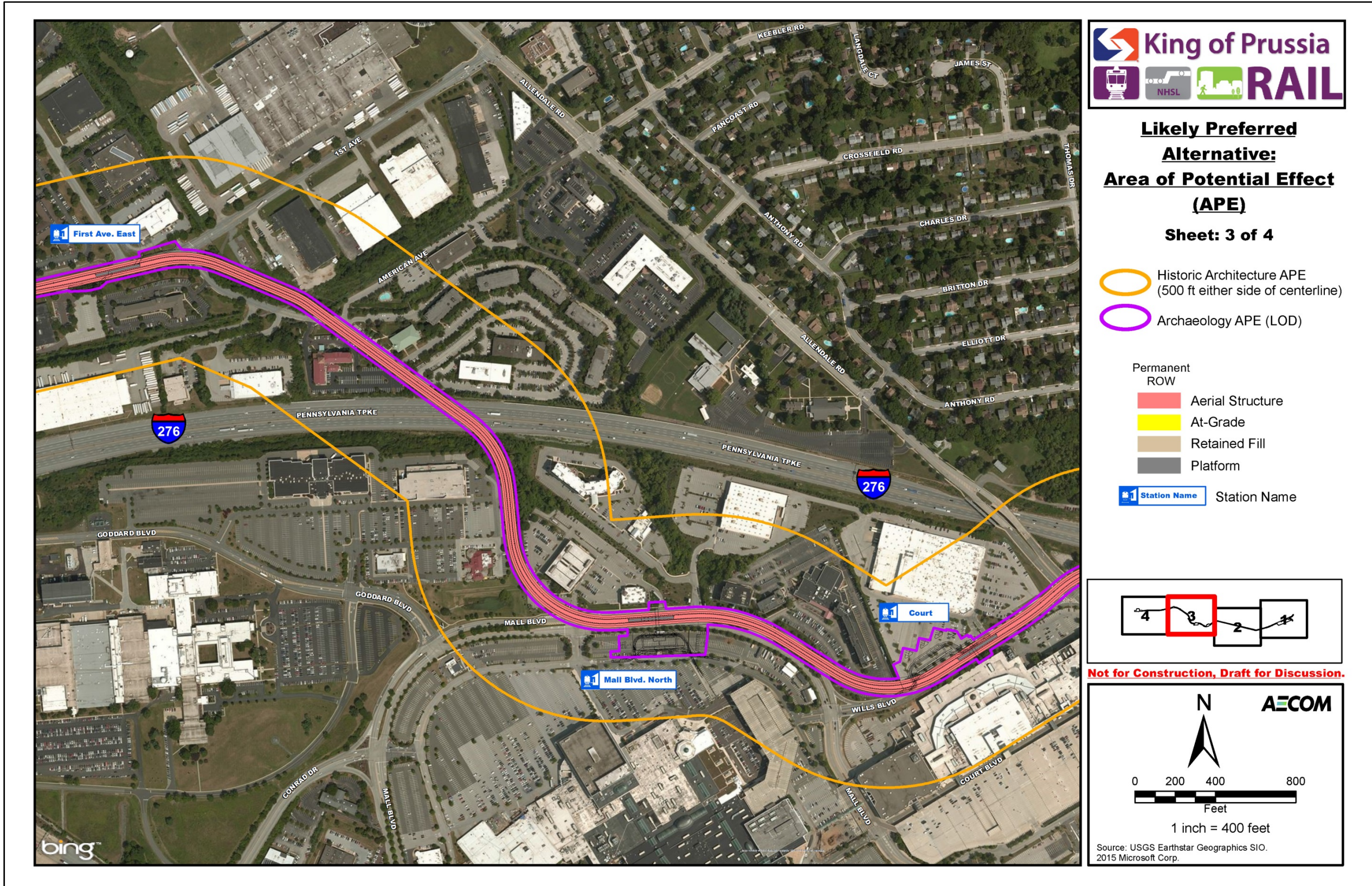


Figure 4-3. Area of Potential Effect for cultural resources along the Likely Preferred Alternative in Upper Merion Township, Montgomery County.

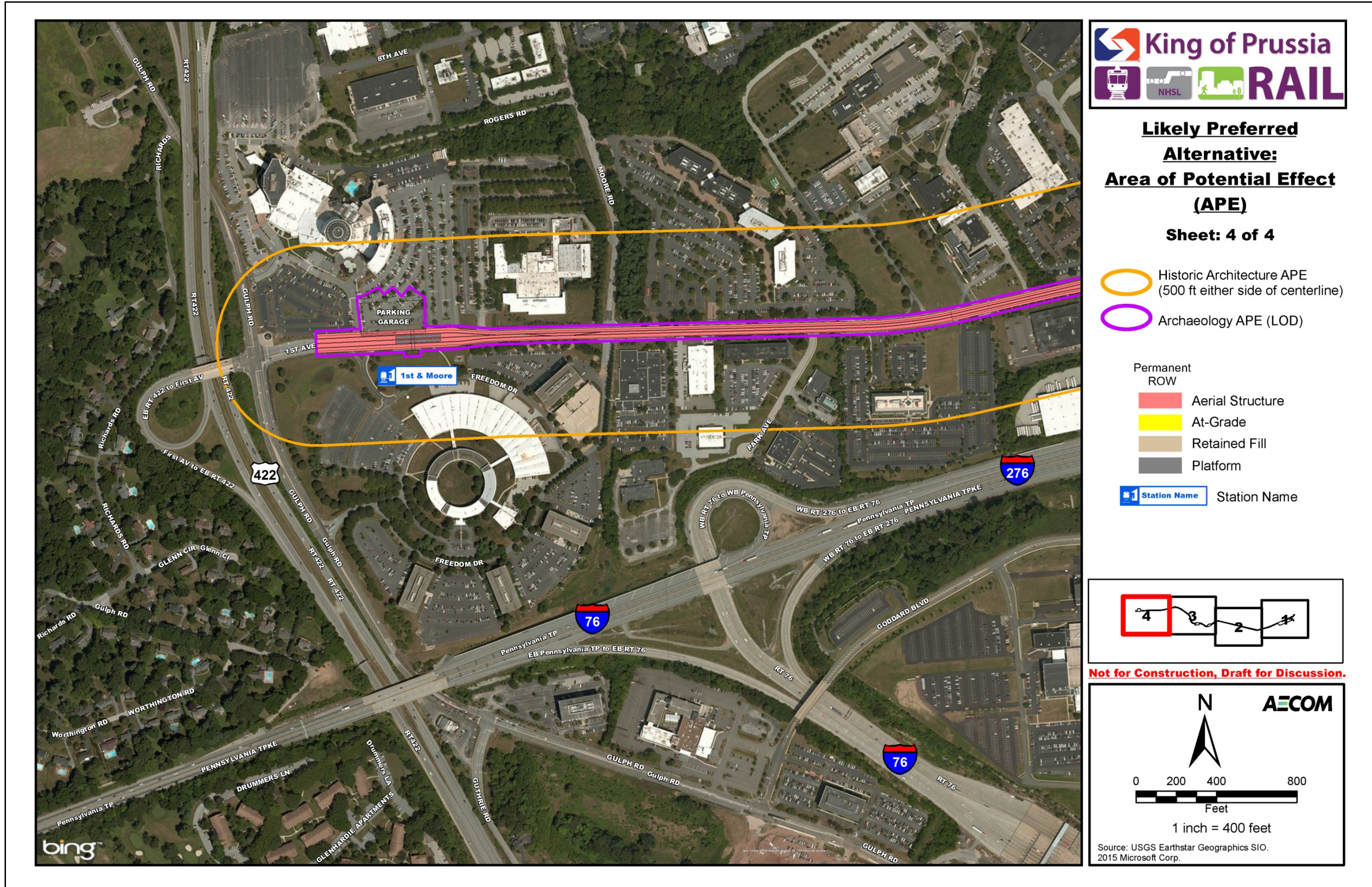


Figure 4-4. Area of Potential Effect for cultural resources along the Likely Preferred Alternative in Upper Merion Township, Montgomery County.

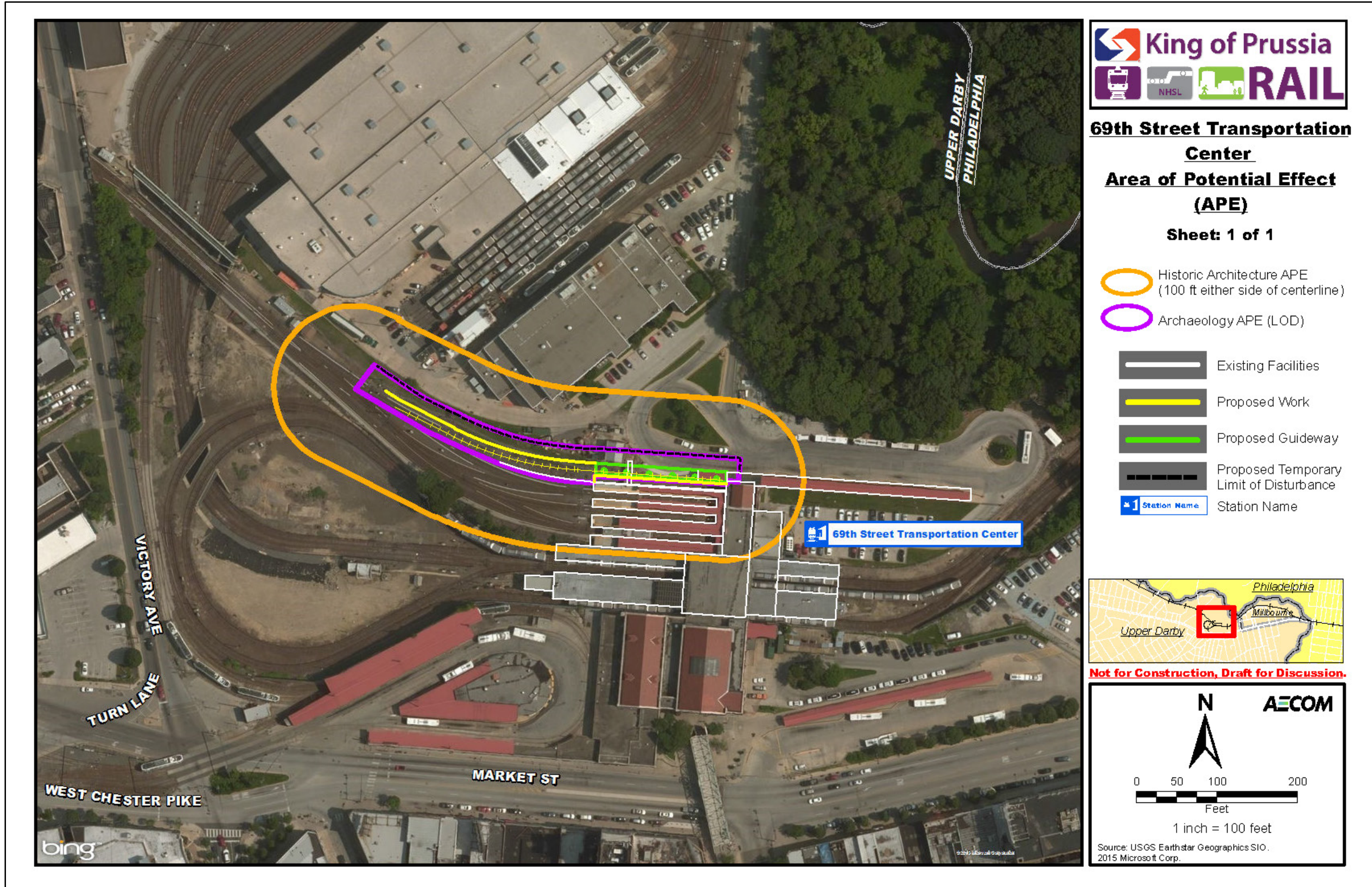


Figure 5. Area of Potential Effect for cultural resources at the 69th Street Transportation Center in Upper Darby Township, Delaware County.

4.0 CONCLUSION AND RECOMMENDATIONS

With concurrence on the APE, Section 106 consultation between FTA, SEPTA, PHMC, and other consulting parties will continue to determine the appropriate level of effort required to identify all cultural resources in the APE potentially eligible for inclusion in, eligible for inclusion in, or listed in the NRHP that might be directly or indirectly affected by anticipated project construction and staging activities. Recommendations for further work are included below.

4.1 Archaeology

A Phase IA archaeological survey will be completed for the Likely Preferred Alternative. The Phase IA archaeological survey will be completed according to PHMC's 2008 *Guidelines for Archaeological Investigation*. The purpose of the Phase IA archaeological survey will be to determine the archaeological sensitivity within the archaeology APE and develop recommendations.

4.2 Historic Architecture

Based upon preliminary design plans, the following methodology is recommended:

A historic structures survey of standing resources that are 50 years or older within the APE will be undertaken to evaluate these resources for listing in the NRHP. Historic contexts and surveys will be utilized in assessing the history and eligibility of these resources. Existing PHMC architectural survey documentation will be consulted to inventory all previously identified resources within the APE, and a list of previously identified historic resources that have been listed in or determined eligible for the National Register will be generated.

The scope of work will include archival research, photographic documentation of above-ground resources, and preparation of Pennsylvania Historic Resource Survey forms (HRSFs) documenting these resources. HRSFs will be prepared only for those resources that have not been previously inventoried as part of earlier survey efforts, as well as previously identified resources that have not been evaluated for National Register eligibility.

If requested by PHMC, a subsequent study will be undertaken to assess the potential effects of the KOP Rail project on NRHP-listed or eligible resources in the APE.

5.0 CONSULTING PARTIES AND PUBLIC PARTICIPATION

As part of the Section 106 process, a number of parties could have a consultative role in the project. These parties can include State and Tribal Historic Preservation Officers (SHPOs and THPOs), Indian tribes, representatives of local governments, applicants for federal assistance, permits, licenses and other approvals, property owners, and certain individuals and organizations who have demonstrated an interest in the undertaking. These parties are invited to provide input on the four steps of the Section 106 process: identifying historic properties in the APE, assessing the project's potential to affect such properties, seeking ways to avoid, minimize or mitigate any adverse effects to historic properties, and resolving adverse effects, as necessary.

In February 2013, AECOM submitted a project initiation package to PHMC to initiate consultation under Section 106 of the NHPA and introduce the KOP Rail project. PHMC issued a response in April 2013 requesting review of the list of consulting parties and tribes that would be invited to participate as consulting parties (see Appendix A of this report). PHMC also recommended that the National Park Service be included because the western edge of the project area is located approximately 1,500 feet southeast of the Valley Forge National Historic Landmark.

SEPTA and FTA have conducted several meetings with other federal and state agencies as part of the NEPA process. Municipal and local organizations have also been involved in project meetings. FTA and the Philadelphia District of the United States Army Corps of Engineers will coordinate consultation with Federal Recognized Tribes.

In response to PHMC's April 2013 request, AECOM has compiled a draft list of potential organizations and individuals that may have an interest in the project. Those parties include:

- National Park Service, Northeast Region
- Valley Forge Park Commission
- Montgomery County Planning Commission
- Montgomery County Division of Parks, Trails and Historic Sites
- Historical Society of Montgomery County
- Upper Merion Township Planning Commission
- King of Prussia Historical Society
- Chester County Historic Preservation Network
- Chester County Historical Society
- Tredyffrin Historic Preservation Trust
- Tredyffrin Township Historical Commission
- Upper Darby Township
- Delaware County Planning Department

6.0 REFERENCES

Delaware Valley Regional Planning Commission

2015 Connections 2040 Plan for Greater Philadelphia. Available online at <http://www.dvrpc.org/Connections2040/>.

United States Geological Survey (USGS)

1967 *Lansdowne Quadrangle*. 7.5-minutes series. 1:24000 (Revised 1994).

1967 *Philadelphia Quadrangle*. 7.5-minutes series. 1:24000 (Revised 1994).

1992 *Norristown Quadrangle*. 7.5-minute series. 1:24000.

1992 *Valley Forge Quadrangle*. 7.5-minute series. 1:24000.

APPENDIX A: PHMC CORRESPONDENCE



Commonwealth of Pennsylvania
Pennsylvania Historical and Museum Commission
Bureau for Historic Preservation
Commonwealth Keystone Building, 2nd Floor
400 North Street
Harrisburg, PA 17120-0093
www.phmc.state.pa.us

4 April 2013

Alan Tabachnick
AECOM
516 E State Street
Trenton NJ 08609

Re: ER 2013-1006-091-A
Norristown High Speed Line Extension
Upper Merion Township, Montgomery County

Dear Mr. Tabachnick:

Thank you for submitting information concerning the above referenced project. The Bureau for Historic Preservation (the State Historic Preservation Office) 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.

Thank you for the project initiation package, including the mapping of the initial project area and National Register listed and eligible resources located within the vicinity, as well as the opportunity to participate in the Agency Advisory Committee Meeting on March 27, 2013.

We request review of a copy of the list of organizations and individuals that you plan to invite to participate in the Section 106 consultation process as consulting parties as well as additional information on your plan for tribal consultation. Since the project area contains a National Historic Landmark, you will need to include the appropriate representatives from the National Park Service in the Section 106 consultation process.

As the project alternatives are refined, we anticipate the receipt of more detailed information on the identification of historic properties and measures to avoid or minimize effects. To assist you in your identification of known historic and archaeological resources, the Bureau for Historic Preservation (PHMC-BHP) maintains records of National Register listed and eligible resources as well as archaeological surveys (P.A.S.S. files). Information on many of these resources is available on our web based Cultural Resources Geographic Information System (CRGIS) <http://crgis.state.pa.us>. Additional information is available in the survey reports and files of the PHMC-BHP's research room. Please consult the unpublished reports and files to determine what is known in the project area and whether or not the previous survey information may require an update.



Pennsylvania Historical & Museum Commission

Tom Corbett, Governor · Andrew E. Masich, Chairman · James M. Vaughan, Executive Director

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4 April 2013
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In addition, a comparison of historic (available at pennpilot.psu.edu) and current aerial mapping would be useful for identifying changes to the landscape over time as well as additional resources within the project vicinity that meet the National Register 50-year-age consideration.

We also welcome the opportunity for a site visit to identify 50-year-old resources not previously assessed for National Register eligibility and further assess the potential effects of the various alignments on National Register listed and eligible resources.

If you need further information regarding archaeological resources, please contact Mark Shaffer at (717) 783-9900. If you need further information concerning historic structures, please contact Barbara Frederick at (717) 772-0921.

Sincerely,



Douglas C. McLearen, Chief
Division of Archaeology & Protection

DCM/bcf

