



SECTION 106  
DETERMINATION OF EFFECTS REPORT

**Prepared for:**  
**Southeastern Pennsylvania Transportation Authority (SEPTA)**



**Prepared by:**

**AECOM**  
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**Determination of Effects Report**

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

ER# 2013-1006-091

Upper Merion Township, Montgomery County, and

Upper Darby Township, Delaware County

Pennsylvania

January 2017

The Southeastern Pennsylvania Transportation Authority (SEPTA) is preparing a Draft Environmental Impact Statement (DEIS) as part of planning studies for the King of Prussia Rail Project (Project), a proposed extension of public transit service to King of Prussia. As part of cultural resource investigations undertaken for the Project, AECOM previously identified and evaluated historic architectural resources in the Project's Area of Potential Effect (APE) in Upper Merion Township, Montgomery County and Upper Darby Township, Delaware County (Attachment A, Figures 1a-1b and 2a-2e) (AECOM 2016).

This Determination of Effects Report addresses the potential effects of the Project on four National Register-eligible resources within the APE of the Project: the Pennsylvania Turnpike: Delaware River Extension; the American Baptist Churches U.S.A. Mission Center; the Philadelphia and Western Railroad: Norristown High Speed Line; and the Market Street Elevated Railway Historic District. The effects of the Project were also evaluated for the 69<sup>th</sup> Street Terminal Square Historic District, per Pennsylvania State Historic Preservation Office (PA SHPO) request, since the Project APE contains a non-eligible resource (Philadelphia Transit Co. Building) that contributes to the 69<sup>th</sup> Street Terminal Square Historic District. Figures are provided in Attachment A, photographs are provided in Attachment B, Project correspondence is provided in Attachment C, and Pennsylvania Historic Resources Survey (PHRS) forms and previous documentation are provided in Attachment D.

**1.0 Project Purpose and Need**

The purpose of the proposed Project is to extend faster, more reliable, public transit service to the King of Prussia area in a manner that:

- Offers improved transit connections to the area from communities along the existing Norristown High Speed Line, Norristown and Philadelphia;
- Improves connectivity between defined key destinations within the KOP 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 substantial planned commercial, industrial, and residential development for the area.

## 2.0 Project Description

SEPTA is considering alternatives to address the Project purpose and need, including a No Action Alternative, a recommended locally preferred alternative (LPA), and other alternatives. Outreach and coordination with the public, agencies and other stakeholders, as well as detailed analysis of the alternatives, enabled SEPTA to identify a recommended LPA in Fall 2015. In coordination with PHMC and because a recommended LPA was identified in the DEIS process, FTA and SEPTA are focusing Section 106 consultation regarding potential effects to historic and archaeological resources on the recommended LPA<sup>1</sup>. FTA may consult for the recommended LPA under the authority of the 2012 Federal Highway Administration/FTA Environmental Review Process Guidance, which states that to the maximum extent practicable, a recommended LPA should be identified and developed to a higher level of detail than other alternatives in a DEIS and in other Federal processes (such as Section 106).

### 2.1 Recommended LPA

SEPTA's recommended LPA was identified as a result of a rigorous screening process during development of the DEIS. As described in Chapter 8 of the DEIS, it was identified for a combination of reasons:

- Best achieves the Project purpose and need
  - Travel time savings
  - Ridership increase
  - Increase in transit parking capacity
  - Station areas in transit-oriented Mixed Use District
  - Access to jobs, community facilities and parks
- Best achieves factors for broad acceptance by key stakeholders and political leaders:
  - Serves areas with the most redevelopment potential
  - Serves areas with relative ease of implementing new transit-supportive zoning
  - Avoids using US Route 202
  - Uses 1<sup>st</sup> Avenue
  - Avoids using PECO west of the PA Turnpike
  - Aligned behind King of Prussia Mall
- Least natural and built environment effects
  - Number of potential partial and full residential acquisitions
  - Park impacts
  - Visual effects

The recommended LPA, known in the DEIS as PECO/TP-1<sup>st</sup> Ave., would provide a new railroad line extending roughly west from the existing Norristown High Speed Line (NHSL) and terminating near the intersection of 1<sup>st</sup> Avenue. and N. Gulph Road at the Valley Forge Casino Resort (VFCR) (Attachment A, Figures 1a and 2a-2d).

The recommended LPA would use portions of the PECO electric utility corridor and PA Turnpike, passing to the north of the King of Prussia Mall, turning north to use a portion of the

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<sup>1</sup> The recommended LPA is referred to in Section 106 documentation, and is the same as the Likely Preferred Alternative.

former Norfolk Southern (NS) Industrial Track right-of-way before turning west along 1<sup>st</sup> Avenue and ending near the intersection of 1<sup>st</sup> Avenue and N. Gulph Road near the VFCR.

As part of the recommended LPA, two tracks would be provided on guideway, with the guideways primarily elevated. 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 Attachment A, Figures 2a-2d. The route includes five proposed stations, including Henderson Road, the Court, Mall Boulevard North, 1st Avenue East, and the terminal station 1<sup>st</sup> & Moore. The Henderson Road and 1<sup>st</sup> & 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 1<sup>st</sup> & Moore.

As the elevated guideway approaches the western terminal station, 1st & Moore, 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 recommended LPA alignment.

In the recommended LPA, SEPTA would to add one new station track at their 69th Street Transportation Center in Upper Darby Township, Delaware County (Attachment A, Figures 1b and 2e). 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.

If the alignment of the recommended LPA should shift in future, after concurrence has been made on the effects of the proposed Project, further consultation with PHMC will likely be needed.

### **3.0 Description of the Area of Potential Effect**

The APE for historic architecture was defined in consultation with the PA SHPO and encompasses all areas where anticipated construction and staging activities might directly or indirectly (i.e., visually) affect historic architectural properties. The historic architecture APE for the recommended LPA was determined in relation to the character of the proposed work. The level of design for the Project is conceptual for planning purposes, and figures and graphics

reflect this planning stage. The PA SHPO concurred with the APE on March 7, 2016 (PHMC 2016a; Attachment C).

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 1st Avenue (Attachment A, Figures 1a and 2a-2d). This boundary encompasses proposed infrastructure, including the guideway, stations, and park-and-ride facilities.

The Upper Merion Township section of the Project would involve constructing all-new infrastructure, including stations, park-and-ride facilities and the elevated guideway. While the Project would use existing transportation and utility rights-of-way when reasonably feasible, it would be a visible change in the landscape. As such, an APE extending 500 feet on either side of the centerline of the proposed 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 recommended LPA 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 by the existing NHSL embankment and surrounding vegetation.

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 (Attachment A, Figures 1b and 2e). The APE for the 69th Street Transportation Center improvements was based upon the relatively low profile of the work proposed. The Project area at the 69<sup>th</sup> Street Transportation Center 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 proposed work area, the Project has limited or no visibility from the surrounding area. An APE of 100 feet was deemed appropriate.

#### **4.0 Determination of Eligibility**

As part of the KOP Rail 2016 *Intensive-Level Survey and Determination of Eligibility Report*, AECOM identified 23 historic architectural resources within the Project APE that are more than 50 years of age, including 13 that were previously identified and 10 that were identified through the current survey initiative (AECOM 2016). Three resources located within the Project APE were previously determined NRHP-eligible by the PA SHPO: the Pennsylvania Turnpike: Delaware River Extension (BHP Key No. 155879); the Philadelphia and Western Railroad; Norristown High Speed Line (BHP Key No. 128825); and the Market Street Elevated Railway Historic District (BHP Key No. 105499) (Table 1).

Following survey work for the Project, AECOM recommended that the American Baptist Churches U.S.A. (ABCUSA) Mission Center at 588-590 N. Gulph Road in Upper Merion Township is eligible for NRHP listing (Table 1). In a letter dated September 26, 2016, the PA SHPO concurred with that recommendation and determined that the ABC-USA Mission Center is eligible for NRHP listing (PA SHPO 2016). (PHMC 2016b; Attachment C, Attachment D).

One previously identified resource within the Project APE, the Philadelphia Transit Co. Building (BHP Key No. 079220), was determined not individually eligible in 2013, but remains a contributing resource for both the Market Street Elevated Railway Historic District and the nearby 69<sup>th</sup> Street Terminal Square Historic District (BHP Key No. 156448), located south of Market Street (Table 2). Although the 69<sup>th</sup> Street Terminal Square Historic District is not located within the APE of the Project, PA SHPO requested an evaluation of the potential for the Project to have proximity effects on the District.

**Table 1. NRHP-Eligible Resources within Project APE**

BHP KEY NO.	RESOURCE NAME	RESOURCE TYPE	DATE OF CONSTRUCTION	NRHP STATUS
155879	Pennsylvania Turnpike: Delaware River Extension	Transportation (Highway)	Ca. 1954	Eligible
203535	American Baptist Churches U.S.A. Mission Center	Organizational	Ca. 1962	Eligible
128825	Philadelphia and Western Railway; Norristown High Speed Line	Transportation (Railroad)	Ca. 1907	Eligible
105499	Market Street Elevated Railway Historic District	Transportation (Railroad)	Ca. 1908	Eligible

**Table 2. Resources Within Project APE Which Contribute to NRHP-Eligible Historic Districts**

BHP KEY NO.	RESOURCE NAME	RESOURCE TYPE	DATE OF CONSTRUCTION	NRHP STATUS
079220	Philadelphia Transit Co. Building	Transportation (Railroad)	Ca. 1909	Not Eligible but contributes to: BHP Key No. 105499 (Market Street Elevated Railway Historic District) and BHP Key No. 156448 (69th Street Terminal Square Shopping District)

## 5.0 Determination of Effects

This *Determination of Effects Report* addresses the potential effects of the Project recommended LPA on the Pennsylvania Turnpike: Delaware River Extension; the American Baptist Churches U.S.A. Mission Center; the Philadelphia and Western Railroad: Norristown High Speed Line; the Market Street Elevated Railway Historic District; and the 69th Street Terminal Square Historic District (Tables 3-10). This *Determination of Effects Report* addresses above-ground resources. A *Phase IA Archaeological Survey Report* was prepared in July 2016 for below-ground resources in the APE of the project. This report recommended no further archaeological investigation of the LPA's APE. PA SHPO concurred with this finding in a letter dated December 15, 2016 (PA SHPO 2016c).

Section 106 of the National Historic Preservation Act (NHPA), codified as 36 CFR Part 800, defines an adverse effect as an undertaking that may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the NRHP in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. Consideration should be given to all qualifying characteristics of a historic property, including those that may have been identified subsequent to the original evaluation of the property's eligibility for the NRHP. Adverse effects may include reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance, or be cumulative (36 CFR 800.5[a]).

Adverse effects to historic properties include, but are not limited to:

- Physical destruction of, or damage to, all or part of the property;
- Alteration of a property, including restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation and provision of handicapped access, that is not consistent with the Secretary's Standards for the Treatment of Historic Properties (36CFR part 68) and applicable guidelines;
- Removal of the property from its historic location;
- Change of the character of the property's use or of physical features within the property's setting that contribute to its historic significance;
- Introduction of visual, atmospheric, or audible elements that diminish the integrity of the property's significant historic features;
- Neglect of the property which causes its deterioration, except where such neglect and deterioration are recognized qualities of a property of religious and cultural significance to an Indian tribe or Native Hawaiian organization; and
- Transfer, lease, or sale of property out of Federal ownership or control without adequate and legally enforceable restrictions or conditions to ensure long-term preservation of the property's historic significance (36 CFR 800.5[a]).

## 5.1 Pennsylvania Turnpike: Delaware River Extension (BHP Key No. 155879)

The Pennsylvania Turnpike's Delaware River Extension, running from the Valley Forge Interchange in Montgomery County through Bucks County to the Delaware River, was completed in 1954 (Attachment D). It provided an extension from the older Turnpike Main Section to the eastern boundary of Pennsylvania, facilitating interstate travel between Pennsylvania and New Jersey and points beyond across the Delaware River Bridge. The Delaware River Extension is significant under Criterion A for its association with the post-World War II toll-road movement, and as one of the last in a regional system of high-speed, limited-access superhighways connecting northeastern and north-central states with Chicago. Its period of significance is defined as ca. 1938 to 1956.

According to the 2005 historic context for the Pennsylvania Turnpike, key contributing elements of the Turnpike as a historic district include features associated with the engineering standards used in the original construction, including travel lanes (originally two in each direction); interchanges and toll plazas; tunnels; abandoned sections; bridges, culverts and retaining walls; service plazas; and maintenance facilities and state police stations (Kuncio et al. 2005:67-68; 72-76). The vegetated areas outside the travel lanes but inside the property boundary are not defined as contributing elements. The Pennsylvania Turnpike's Main Line, Delaware River Extension, and Northeast Extension were determined eligible for NRHP listing in 2005 (Attachment B, Photograph 1).

As a linear civil engineering resource continually being upgraded for safety and maintenance purposes, certain aspects of the integrity of the Pennsylvania Turnpike are of greater importance than others. Some alterations are viewed in the 2005 historic context as "evolutionary" and do not impact integrity, but more drastic deviations from the original design could compromise integrity. The Turnpike's integrity of design and location remain paramount; the original alignment, roadway grading, and curvature of travel lanes and the original buildings and structures such as service plazas must remain intact for the highway to retain integrity. Alterations such as widening of shoulders and placement of new median guiderails are considered in the 2005 historic context to be evolutionary and do not affect integrity of location and design. However, larger changes such as adding travel lanes, changes in roadway grade or curvature, relocation and redesign of interchanges and ramps, widening the median by more than 10 feet, and relocation or redesign of service plazas and other buildings are considered to diminish integrity. Three-lane sections are considered to have lost integrity (Kuncio et al. 2005:74-77).

Integrity of materials and workmanship is less important on roadways; repaving and replacing of roadway elements is considered in the 2005 historic context to be evolutionary. Retention of materials and workmanship on Turnpike buildings and bridges, such as characteristic stone facing, is important. The feeling and association of the Turnpike are dependent upon retention of its design elements and its alignment. The integrity of setting of the Turnpike is considered in the 2005 historic context to be relatively unimportant to its overall significance, since it was not constructed as a scenic road, and passes through a variety of differing landscapes. As such, modern alterations to the setting around and even above the important Turnpike elements, such as adjacent development and the placement of new bridges over the roadway, are not considered to detract from its overall integrity (Kuncio et al. 2005:74-76).

Within the section of the Pennsylvania Turnpike's Delaware River Extension that passes through the APE, it should be noted that integrity of design, location, materials, workmanship, and feeling has already been compromised. The highway has been widened by one travel lane



or more in each direction throughout the APE; the Valley Forge Interchange at the west end of the APE has been redesigned with new double-lane ramps to the east of the interchange in both directions; and the King of Prussia Service Plaza at the east end of the APE has been demolished and rebuilt with an entirely new design. Although the four original travel lanes and median are extant, they now reside within a much wider and modernized corridor.

The recommended LPA would provide two new elevated overpasses crossing the PA Turnpike, as well as a stretch of elevated track running parallel to the south side of the Turnpike, within the Turnpike right-of-way. The eastern of the two crossings would follow the existing PECO right-of-way on a southwest-northeast trajectory across the PA Turnpike on a new elevated structure at approximately MP 328.5, just east of the King of Prussia Service Plaza. The elevated track would then run northwest along and within the southern edge of the PA Turnpike’s right-of-way for approximately 0.85 mile. The elevated track would leave the PA Turnpike right-of-way near MP 327.7, just east of Allendale Road, and circulate through the King of Prussia Mall area along Wills Blvd. and Mall Blvd. It would then recross the Turnpike east of Goddard Blvd. This western crossing would be on a northwest/southeast trajectory on a new elevated structure at approximately MP 327.0, passing into the King of Prussia Business Park at American Avenue (Attachment A, Figure 3; Attachment B, Photographs 2-5).

The effects of the Project on the Pennsylvania Turnpike: Delaware River Extension were analyzed in accordance with Section 106; the findings are summarized in **Tables 3 and 4**. In the evaluation, the recommended LPA is determined to have no adverse effect on the Pennsylvania Turnpike: Delaware River Extension.

**Table 3. Results of Effects Evaluation for the Pennsylvania Turnpike: Delaware River Extension**

Definition of Effect	Evaluation
An effect may occur when there is alteration to the characteristics of a historic property qualifying it for inclusion in or eligible for the NRHP as defined in Section 800.16(l).	The recommended LPA would provide two new elevated overpasses crossing the PA Turnpike in Upper Merion Township, and approximately 0.85 mile of elevated track running parallel to and within the south side of the Turnpike, within the Turnpike right-of-way. In both locations, the Project would be within the National Register boundaries of the eligible Pennsylvania Turnpike: Delaware River Extension (Attachment B, Photographs 2 and 3).
<b>Finding: The proposed undertaking results in a finding of Historic Properties Affected.</b>	

**Table 4. Application of Criteria of Adverse Effect for Pennsylvania Turnpike: Delaware River Extension**

<p>An adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the NRHP in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. Consideration shall be given to all qualifying characteristics of a historic property, including those that may have been identified subsequent to the original evaluation of the property's eligibility for the NRHP. Adverse effects may include reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance or be cumulative.</p>	
Examples of Adverse Effects (36 CFR 800.5(a)(2))	Evaluation
<p>Adverse effects on historic properties include, but are not limited to:</p>	
<p>(i) Physical destruction of or damage to all or part of the property;</p>	<p>The recommended LPA would not physically damage or destroy travel lanes or other features associated with the engineering standards used in the original construction. The existing Turnpike alignment would be preserved (see Attachment B, Photographs 1-5).</p>
<p>(ii) Alteration of a property, including restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation, and provision of handicapped access, that is not consistent with the Secretary's Standards for the Treatment of Historic Properties (36 CFR Part 68) and applicable guidelines;</p>	<p>Although the Project would pass over and run parallel to the roadway, according to the 2005 historic context for the PA Turnpike, these proposed alterations to its setting would not affect its integrity. Thus, the Project would not alter the PA Turnpike in a manner inconsistent with CFR Part 68. The proposed Project would not result in the alteration of any extant contributing historic buildings, structures, or objects within the PA Turnpike's NR boundary. (Attachment B, Photographs 1-5).</p>
<p>(iii) Removal of the property from its historic location;</p>	<p>The recommended LPA would not involve removal of the Pennsylvania Turnpike: Delaware River Extension from its historic location.</p>
<p>(iv) Change of the character of the property's use or of physical features within the property's setting that contribute to its historic significance;</p>	<p>The recommended LPA would not impact continued use of the PA Turnpike as a highway. As stated above, this stretch of the Turnpike already has diminished integrity due to modern improvements. Since changes to the setting are not considered to detract from the Turnpike's integrity under the 2005 historic context guidelines, the recommended LPA would not change the character of the PA Turnpike's use or affect remaining physical features that contribute to its historic significance. (Attachment B, Photographs 1-5).</p>

<p>(v) Introduction of visual, audible, or atmospheric elements that diminish the integrity of the property's significant historic features;</p>	<p>The recommended LPA would introduce new visual elements into the PA Turnpike corridor, including two new elevated crossings over the roadway and elevated tracks along the south side of the roadway, within the right-of-way. These elements would be visible to motorists in the PA Turnpike corridor. However, given that alterations to the setting are not considered to detract from the resource's overall integrity according to the 2005 historic context, the new visual elements would not diminish the integrity of the remaining historic and character-defining features of the Turnpike, which consist of the original four travel lanes and median area (Attachment B, Photographs 2 and 5).</p>
<p>(vi) Neglect of a property which causes its deterioration, except where such neglect and deterioration are recognized qualities of a property of religious and cultural significance to an Indian tribe or Native Hawaiian organization; and</p>	<p>The recommended LPA would not affect maintenance of the Pennsylvania Turnpike: Delaware River Extension, which is the responsibility of the PA Turnpike Commission. Neglect of the roadway is not anticipated to occur as a result of the Project.</p>
<p>(vii) Transfer, lease, or sale of property out of Federal ownership or control without adequate and legally enforceable restrictions or conditions to ensure long-term preservation of the property's historic significance.</p>	<p>The Pennsylvania Turnpike is not under Federal ownership; the Project would not result in the transfer, lease, or sale of the Pennsylvania Turnpike out of Federal control.</p>
<p><b>Finding:</b> The proposed undertaking results in a finding of <b>No Adverse Effect on the Pennsylvania Turnpike: Delaware River Extension (BHP Key No. 128825)</b></p>	

## 5.2 American Baptist Churches U.S.A. Mission Center (BHP Key No. 203535) 588-590 N. Gulph Road

The American Baptist Churches U.S.A. (ABCUSA) Mission Center is a Modernist campus designed by Philadelphia architect Vincent Kling and built ca. 1962 as a home for various agencies of the American Baptist denomination. The campus includes four buildings: the Office and Conference Center, Cafeteria, Graphic Arts Building, and Utility Building. The circular Office and Conference Center forms the heart of the campus, with the fan-shaped Graphic Arts Building and the smaller buildings surrounding it to the north and east (Attachment B, Photograph 6). The campus core contains original landscape features, such as terraces, sidewalks, and a large parking lot to the northwest. The property was determined eligible for NRHP listing on September 26, 2016 under Criterion C, Architecture; the NRHP boundary consists of the current 23.9-acre tax parcel encompassing the four buildings and surrounding land at the southeast corner of N. Gulph Road and 1<sup>st</sup> Avenue (Attachment C).

The property derives its primary significance from the design and artistic quality of its Vincent Kling-designed Modernist building complex, with a group of four interrelated buildings and landscaped spaces among them. Although conceived as a large corporate campus with open space surrounding the central building complex, the property's overall setting has lost integrity due to redevelopment of much of the original campus land area and modern development on surrounding properties. In addition, although when built, the building complex was surrounded by open lawns and was highly visible from the PA Turnpike, N. Gulph Road, and 1<sup>st</sup> Avenue, subsequent redevelopment of the campus periphery and installation of trees for a wooded landscape ca. 1984 have now largely obscured views of the building complex from most angles. The only remaining vantage point for the ABCUSA Mission Center building complex is from 1<sup>st</sup> Avenue north and northwest of the complex, but modern earthen berms, flagpoles, a stormwater basin, and small trees obscure the view somewhat and have diminished the integrity of the remaining open space in this quadrant. Most other vantage points are now blocked by modern buildings and groves of mature trees. In summary, the overall campus setting, beyond the building complex, no longer represents a key element of what makes the property significant. As such, further changes to the surrounding setting are unlikely to affect the historical significance of the campus core.

The western terminus of the recommended LPA would be on 1<sup>st</sup> Avenue, immediately north of the ABCUSA Mission Center. This terminus would include a station with three tracks and platforms on an elevated guideway structure; a pedestrian stairway and bridge across 1<sup>st</sup> Avenue from the south side of the road; and a multistory parking garage on the north side of the station. The parking garage would be located in an existing surface parking area on the property now occupied by the VFCR.

The elevated tracks and station would be approximately 17 feet above 1<sup>st</sup> Avenue. Additional right-of-way would be needed from the ABCUSA property to accommodate the track guideway, which would be wider than the 1<sup>st</sup> Avenue right-of-way, and the pedestrian access element on the south side of the station. Specifically, a narrow strip of land along the south side of 1<sup>st</sup> Avenue within the boundary of the ABCUSA Mission Center property (approximately 0.85 acre) would be required.

The elevated guideway and station structure, as well as the proposed parking garage on the north side of 1<sup>st</sup> Avenue would be visible from the ABCUSA complex. (Attachment A, Figure 4; Attachment B, Photographs 6-8).

The effects of the Project on the ABCUSA Mission Center were analyzed in accordance with Section 106 (Tables 5 and 6). In the evaluation, the recommended LPA is determined to have no adverse effect on the ABCUSA Mission Center.

As a small sliver of the property (approximately 0.08 acre of grassy area adjacent to 1<sup>st</sup> Avenue, less than 0.4 percent of the overall 23-acre property) would be acquired to accommodate the proposed new guideway and station area, a use of the property would occur as defined by Section 4(f) of the US Department of Transportation Act of 1966 (49 USC 303, and its implementing regulations codified at 23 CFR Part 774. Due to the small size and location of the proposed land acquisition, FTA is proposing a *de minimis* impact determination, meaning that the recommended LPA would not impact the features, attributes or activities that qualify the American Baptist Churches, USA Mission Center property for protection by Section 4(f). FTA can make this its final determination provided that the official with jurisdiction over this historic property, the PHMC, agrees. PHMC agreement is achieved by concurring with the proposed Section 106 finding of no adverse effect on the ABCUSA Mission Center, reported in Table 5 below.

**Table 5. Results of Effects Evaluation for ABCUSA Mission Center**

Definition of Effect	Evaluation
An effect may occur when there is alteration to the characteristics of a historic property qualifying it for inclusion in or eligible for the NRHP as defined in Section 800.16(l).	To accommodate proposed elevated guideway and station structure, a narrow strip of additional right-of-way (0.85 acre) would be required on the south side of 1 <sup>st</sup> Avenue, within the NR boundary for the ABCUSA Mission Center.
<b>Finding: The proposed undertaking results in a finding of Historic Properties Affected.</b>	

**Table 6. Application of Criteria of Adverse Effect for ABCUSA Mission Center**

An adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the NRHP in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. Consideration shall be given to all qualifying characteristics of a historic property, including those that may have been identified subsequent to the original evaluation of the property's eligibility for the NRHP. Adverse effects may include reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance or be cumulative.	
Examples of Adverse Effects (36 CFR 800.5(a)(2))	Evaluation
Adverse effects on historic properties include, but are not limited to:	

<p>(i) Physical destruction of or damage to all or part of the property;</p>	<p>While a small portion of the NRHP-eligible property would potentially be acquired, no buildings, structures, or objects associated with the property would be physically impacted. Where additional ROW is required on the south side of 1<sup>st</sup> Avenue, the property currently consists of lawn and shrubs sloping northward to an existing sidewalk along 1<sup>st</sup> Avenue. This road-front property is distant from and not part of the campus core and building complex, has already been landscaped with modern elements, and is not an integral aspect of the remaining original landscape features. As stated previously, the setting of the campus has already lost integrity and its peripheral areas, including this one, are now characterized by modern landscaping and views of modern development. (see Attachment B, Photographs 7 and 8)</p> <p>The proposed ROW acquisition within this area would not destroy, damage, or diminish the significance or historic integrity of the ABCUSA Mission Center, or preclude its NRHP eligible status.</p>
<p>(ii) Alteration of a property, including restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation, and provision of handicapped access, that is not consistent with the Secretary's Standards for the Treatment of Historic Properties (36 CFR Part 68) and applicable guidelines;</p>	<p>As previously stated, the property is significant for the architectural design of its building complex, not for its campus setting. The recommended LPA would not result in the alteration of any buildings, structures or landscape features within the building complex at the campus core, or result in work inconsistent with the Secretary's Standards.</p>
<p>(iii) Removal of the property from its historic location;</p>	<p>The recommended LPA would not involve removal of the ABCUSA Mission Center from its historic location.</p>
<p>(iv) Change of the character of the property's use or of physical features within the property's setting that contribute to its historic significance;</p>	<p>The acquisition of additional ROW for the recommended LPA would not interfere with the extant use, internal design, or traffic circulation of the ABCUSA Mission Center. As previously stated, the property derives its significance from the distinctive design and interrelationship of its buildings, rather than from its setting. The buildings are located in the center of the property, at a distance from the proposed Project, and the land acquisition and construction of the Project is not expected to alter their immediate setting or affect their use. The recommended LPA would not change the character of the property's use or affect remaining physical features (namely, the campus core) that contribute to its historic significance (Attachment B, Photographs 7 and 8).</p>

<p>(v) Introduction of visual, audible, or atmospheric elements that diminish the integrity of the property's significant historic features;</p>	<p>The recommended LPA would introduce new visual elements into the surrounding setting of the ABCUSA Mission Center property, including an elevated railroad track guideway, station, and multistory parking garage. These Project elements would be visible from north-facing building elevations within the ABCUSA Mission Center, and the land acquisition would be visible from 1<sup>st</sup> Avenue. However, as previously stated, the integrity of the historic setting of the campus has been compromised (Attachment B, Photographs 6-8). Since the ABCUSA Mission Center property's significance is derived from its architecture, not from its setting, the introduction of these new visual elements to the north, where modern high-rise development already exists, would not diminish the significance or historic integrity of the ABCUSA Mission Center, or preclude its NRHP-eligible status.</p>
<p>(vi) Neglect of a property which causes its deterioration, except where such neglect and deterioration are recognized qualities of a property of religious and cultural significance to an Indian tribe or Native Hawaiian organization; and</p>	<p>The recommended LPA would not result in the neglect of the ABCUSA Mission Center.</p>
<p>(vii) Transfer, lease, or sale of property out of Federal ownership or control without adequate and legally enforceable restrictions or conditions to ensure long-term preservation of the property's historic significance.</p>	<p>The ABCUSA Mission Center is not under Federal ownership; the recommended LPA would not result in the transfer, lease, or sale of the property out of Federal control.</p>
<p><b>Finding:</b> The proposed undertaking results in a finding of <b>No Adverse Effect on the ABCUSA Mission Center (BHP Key No. 203535)</b></p>	

### **5.3 Philadelphia and Western Railway: Norristown High Speed Line (BHP Key No. 128825)**

The Philadelphia and Western Railway: Norristown High Speed Line was constructed as an interurban passenger line ca. 1907, and extends from the Norristown Transportation Center in Norristown, Montgomery County to the 69<sup>th</sup> Street Transportation Center in Upper Darby, Delaware County (Attachment D). It is significant under Criterion A for its association with the development of early twentieth century interurban transportation in Pennsylvania. It was determined eligible for NRHP listing in 1985. Today, the railroad line remains in use as SEPTA's Norristown High Speed Line (NHSL), carrying passengers between Norristown and Upper Darby (Attachment B, Photographs 9 and 10).

The railroad retains integrity of location, materials, workmanship, association, and feeling; however, its design and setting have lost integrity due to facility upgrades (such as signal systems) and modern development of surrounding lands along its length. It derives its primary significance from its association with transportation history, rather than its architectural elements. Although as a linear transportation resource, the railroad is continually upgraded and maintained, many alterations, such as track replacement, are considered to be evolutionary and do not diminish the integrity of the railroad (Miller 2008; Otis 2004).

The recommended LPA would provide new elements at two locations along the NHSL. At the first location, SEPTA would provide two new railroad turnoffs from the west side of the NHSL in Upper Merion Township, Montgomery County. The turnoffs would be at-grade track connections to the NHSL tracks; these connections would allow NHSL trains to turn west off the NHSL toward King of Prussia. The turnoffs would be provided on the NHSL at a point north of the Pennsylvania Turnpike and south of S.R. 0202, following the existing PECO right-of-way. The turnoffs would merge together to form two parallel double tracks for the remainder of the alignment through King of Prussia (Attachment A, Figure 5; Attachment B, Photographs 11 and 12).

At the second location, the 69<sup>th</sup> Street Transportation Center in Upper Darby Township, Delaware County, the recommended LPA includes providing an additional station track on a guideway structure north of and parallel to the existing NHSL tracks. The existing north platform would be widened to accommodate that track along the north side (Attachment A, Figure 6). The new track would parallel the existing cluster of station tracks and be set at the same height in relation to the existing platforms (Attachment B, Photographs 13 and 14).

The effects of the recommended LPA on the Philadelphia and Western Railway: Norristown High Speed Line were analyzed in accordance with Section 106 (Tables 7 and 8). In the evaluation, the recommended LPA is determined to have no adverse effect on the Philadelphia and Western Railway: Norristown High Speed Line.



**Table 7. Results of Effects Evaluation for Philadelphia and Western Railway: Norristown High Speed Line**

Definition of Effect	Evaluation
<p>An effect may occur when there is alteration to the characteristics of a historic property qualifying it for inclusion in or eligible for the NRHP as defined in Section 800.16(l).</p>	<p>The recommended LPA would provide new turnoffs on the west side of the existing NHSL in Upper Merion Township, and a new track north of and parallel with the existing NHSL tracks at the 69<sup>th</sup> Street Transportation Center in Upper Darby Township. At both locations, the activities would add new elements and modify existing elements within the National Register boundaries of the eligible Philadelphia and Western: Norristown High Speed Line, and would connect to existing tracks (Attachment B, Photographs 11-14).</p>
<p><b>Finding: The proposed undertaking results in a finding of Historic Properties Affected.</b></p>	

**Table 8. Application of Criteria of Adverse Effect for Philadelphia and Western Railway: Norristown High Speed Line**

<p>An adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the NRHP in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. Consideration shall be given to all qualifying characteristics of a historic property, including those that may have been identified subsequent to the original evaluation of the property's eligibility for the NRHP. Adverse effects may include reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance or be cumulative.</p>	
Examples of Adverse Effects (36 CFR 800.5(a)(2))	Evaluation
<p>Adverse effects on historic properties include, but are not limited to:</p>	
<p>(i) Physical destruction of or damage to all or part of the property;</p>	<p>While the recommended LPA would add new elements and modify existing elements at two locations within the NR boundary of the historic railroad, no historic buildings, structures, or objects associated with the property would be destroyed. Proposed modifications would impact a modern platform and tracks along the north side of the 69<sup>th</sup> Street Transportation Center, but not alter remaining historic track and platform areas south of the project area. The existing right-of-way would be preserved and the proposed changes would not damage or destroy the resource (Attachment B, Photographs 11-14).</p>
<p>(ii) Alteration of a property, including restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation, and provision of handicapped access, that is not consistent with the Secretary's Standards for the Treatment of Historic Properties (36 CFR Part 68) and applicable guidelines;</p>	<p>The recommended LPA would not alter the historic rail corridor in a manner inconsistent with the Secretary's Standards. The proposed Project would not result in the alteration of any contributing historic buildings, structures, or objects within the resource's NR boundary.</p>

<p>(iii) Removal of the property from its historic location;</p>	<p>The recommended LPA would not involve removal of the Philadelphia and Western Railroad: Norristown High Speed Line from its historic location.</p>
<p>(iv) Change of the character of the property's use or of physical features within the property's setting that contribute to its historic significance;</p>	<p>The recommended LPA represents an expansion of the existing historic use for the railroad. The proposed improvements would not change the character of the railroad's use or affect physical features of its setting that contribute to its historic significance.</p>
<p>(v) Introduction of visual, audible, or atmospheric elements that diminish the integrity of the property's significant historic features;</p>	<p>The recommended LPA's new elements would be visible from the existing railroad corridor. However, the new elements would not detract from the integrity of setting of the NHSL and would not diminish the integrity of the railroad's extant historic features (Attachment B, Photographs 11-14).</p>
<p>(vi) Neglect of a property which causes its deterioration, except where such neglect and deterioration are recognized qualities of a property of religious and cultural significance to an Indian tribe or Native Hawaiian organization; and</p>	<p>The recommended LPA would not result in the neglect of the Philadelphia and Western Railway: Norristown High Speed Line.</p>
<p>(vii) Transfer, lease, or sale of property out of Federal ownership or control without adequate and legally enforceable restrictions or conditions to ensure long-term preservation of the property's historic significance.</p>	<p>The Philadelphia and Western Railway: Norristown High Speed Line is not under Federal ownership; the recommended LPA would not result in the transfer, lease, or sale out of Federal control.</p>
<p><b>Finding:</b> The proposed undertaking results in a finding of <b>No Adverse Effect on the Philadelphia and Western Railway; Norristown High Speed Line (BHP Key No. 128825)</b></p>	

#### 5.4 Market Street Elevated Railway Historic District (Key No. 105499)

The Market Street Elevated Railway Historic District includes the historic corridor and stations associated with the railway, extending from the 69<sup>th</sup> Street Transportation Center in Upper Darby Township, Delaware County, to the 46<sup>th</sup> Street Station in the City of Philadelphia, Philadelphia County (Attachment B, Photograph 15). Completed in 1908, the railroad line carried passenger traffic above Market Street between suburban Upper Darby Township and urban Philadelphia, connecting to other transit lines. The railroad was determined eligible for the NRHP under Criterion A for Transportation in 1996. The NRHP boundary in the vicinity of the Project includes the circa-1909 Philadelphia Transit Co. Building (now part of the 69<sup>th</sup> Street Transportation Center station building) and the Market Street tracks east of the transportation center (Rachleff 1996). The Philadelphia Transit Co. Building (BHP Key No. 079220) is not individually eligible but contributes to the Market Street Elevated Railway Historic District (Attachment B, Photograph 16; Attachment C).

The recommended LPA would require SEPTA to add one new station track at the 69th Street Transportation Center. The new track would be aligned along the north side of the existing NHSL tracks, terminating at the west elevation of the northernmost wing of the existing station 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 a guideway structure rather than continuing the embankment up to the building is to avoid impacting the existing ground-level bus stop and turnaround area on the north side of the station, which would be underneath and adjacent to the new platform-level track (Attachment A, Figure 6; Attachment B, Photographs 17 and 18).

The existing northern platform would be widened to serve the new track on its north side. As with the existing NHSL service, the new track and widened platform would be designed to enable level passenger boarding. The existing doorway connecting the station building to the platform would be enlarged from one door to two doors. The existing modern 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 modern 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 (Attachment A, Figure 6; Attachment B, Photographs 17 and 18). Sections of the 69th Street Transportation Center station building to the south of the north platform, and the other three existing NHSL platforms and tracks, would not be changed or altered by the proposed Project.

The proposed Project elements would be in and adjacent to the non-historic northernmost section of the 69<sup>th</sup> Street Transportation Center's station building. This section is a neo-historical, gabled, brick-faced wing which was added to the north side of the station building ca. 1982, when the current bus circle was created. This gabled section is located to the north of an earlier, circa-1960 extension, with the older extension connecting the north wing to the original circa-1909 Philadelphia Transit Co. Building. The north platform and the windbreak wall along this platform are modern in date. The shared NR boundary of the Market Street Elevated Railway Historic District and the Philadelphia Transit Co. Building is to the south of the circa-1960 and circa-1982 building sections, approximately 100 feet from the proposed Project area at the periphery of the APE (Attachment A, Figure 6; Attachment B, Photograph 19). The Project

elements would not be visible from the historic district due to the height of the newer building sections (Attachment B, Photographs 15 and 19).

The effects of the recommended LPA on the Market Street Elevated Railway Historic District were analyzed in accordance with Section 106 (Table 9). In the evaluation, the recommended LPA is determined to have no effect on the Market Street Elevated Railway Historic District. **As the recommended finding is No Historic Properties Affected, an evaluation of the Criteria of Adverse Effect is not warranted for the Market Street Elevated Railway Historic District (BHP Key No. 105499).**

**Table 9. Results of Effects Evaluation for Market Street Elevated Railway Historic District**

Definition of Effect	Evaluation
<p>An effect may occur when there is alteration to the characteristics of a historic property qualifying it for inclusion in or eligible for the NRHP as defined in Section 800.16(l).</p>	<p>The recommended LPA modifications to the northernmost platform, access stairs, and west elevation of the circa-1982 northernmost section of the 69<sup>th</sup> Street Transportation Center station building would occur in and adjacent to a modern extension of the circa-1909 station building (Philadelphia Transit Co. Building, BHP Key No. 079220). The historic section of the station building would not be altered by the Project, as no work is proposed in or abutting the NR boundary of this property (Attachment A, Figure 6; Attachment B, Photographs 15-19).</p> <p>No work would occur within the NR boundary of the Market Street Elevated Railway Historic District, which shares the same boundary line as the documented Philadelphia Transit Co. Building. The proposed Project would not impact or be visible from the Market Street Elevated Railway Historic District, which extends east from the station in the opposite direction of the NHSL (Attachment B, Photographs 15 and 16). Therefore, the recommended LPA would have no effect on the Market Street Elevated Railway Historic District (BHP Key No. 105499).</p>
<p><b>Finding: The proposed undertaking results in a finding of No Historic Properties Affected.</b></p>	

## 5.5 69<sup>th</sup> Street Terminal Square Shopping District (Key No. 156448)

The 69th Street Terminal Square Shopping District is a commercial district area that developed in the 1920s and 1930s along Market Street to the south of the 69<sup>th</sup> Street Transportation Center (Attachment B, Photograph 20). It is characterized by numerous commercial buildings constructed as retail stores, offices, and entertainment venues in a variety of architectural styles. The district was determined eligible for the NRHP in 2011 under Criterion A for commercial development and Criterion C for its collection of distinctive period commercial buildings (Attachment C). The district is located entirely south of Market Street, opposite the 69<sup>th</sup> Street Transportation Center. Although the Philadelphia Transit Co. Building is not individually eligible and is excluded from the district's NR boundary (Archibald 2011), the building is a contributing resource to the 69<sup>th</sup> Street Terminal Square Shopping District (Attachment C).

The recommended LPA would require SEPTA to add one new station track at the 69th Street Transportation Center. The new track would be aligned along the north side of the existing NHSL tracks, terminating at the west elevation of the northernmost wing of the existing station 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 a guideway structure rather than continuing the embankment up to the building is to avoid impacting the existing ground-level bus stop and turnaround area on the north side of the station, which would be underneath and adjacent to the new platform-level track (Attachment A, Figure 6; Attachment B, Photographs 17 and 18).

The existing northern platform would be widened to serve the new track on its north side. As with the existing NHSL service, the new track and widened platform would be designed to enable level passenger boarding. The existing modern 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 modern 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 (Attachment A, Figure 6; Attachment B, Photographs 17 and 18). Sections of the 69th Street Transportation Center station building to the south of the north platform, and the other three existing NHSL platforms and tracks, would not be changed or altered by the proposed Project.

The proposed Project elements would be adjacent to the non-historic northernmost section of the 69<sup>th</sup> Street Transportation Center's station building. This section is a neo-historical, gabled, brick-faced wing which was added to the north side of the station building ca. 1982. This gabled section is located to the north of an earlier, circa-1960 extension, with the older extension connecting the north wing to the original circa-1909 Philadelphia Transit Co. Building. The north platform and the windbreak wall along this platform are modern in date. The shared NR boundary of the Market Street Elevated Railway Historic District and the Philadelphia Transit Co. Building is to the south of the circa-1960 and circa-1982 building sections, approximately 100 feet from the proposed Project area at the periphery of the APE (Attachment A, Figure 6; Attachment B, Photograph 19). The Project elements would not be visible from the historic district due to topography and the height of the existing station facility (Attachment B, Photographs 16, 21 and 22).

The effects of the recommended LPA on the 69th Street Terminal Square Shopping District were analyzed in accordance with Section 106 (Table 10). In the evaluation, the recommended LPA is determined to have no effect on the 69th Street Terminal Square Shopping District. **As the recommended finding is No Historic Properties Affected, an evaluation of the Criteria of Adverse Effect is not warranted for the 69th Street Terminal Square Shopping District (BHP Key No. 156448).**

**Table 10. Results of Effects Evaluation for 69th Street Terminal Square Shopping District**

Definition of Effect	Evaluation
<p>An effect may occur when there is alteration to the characteristics of a historic property qualifying it for inclusion in or eligible for the NRHP as defined in Section 800.16(l).</p>	<p>The recommended LPA modifications to the northernmost platform, access stairs, and west elevation of the northernmost section of the 69<sup>th</sup> Street Transportation Center station building would occur in and adjacent to a modern extension of the circa-1909 station building (Philadelphia Transit Co. Building, BHP Key No. 079220). The historic section of the station building would not be altered by the Project, as no work is proposed in or abutting the NR boundary of this resource, a contributing resource within the historic district (Attachment A, Figure 6; Attachment B, Photographs 15-19).</p> <p>The proposed Project would not impact or be visible from the 69th Street Terminal Square Shopping District, which has no view of the north side of the NHSL tracks due to topography and building rooflines (Attachment B, Photographs 16, 21 and 22). The Project would not affect the 69th Street Terminal Square Shopping District either visually, or impact the status of the Philadelphia Transit Co. Building as a contributing resource of the district. Therefore, the Project would have no effect on the 69th Street Terminal Square Shopping District (BHP Key No. 156448).</p>
<p><b>Finding: The proposed Project results in a finding of No Historic Properties Affected.</b></p>	

## References Cited

36 CFR Part 800 *Protection of Historic Properties.*

### AECOM

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2016b Memo from Douglas McLearn, PA SHPO regarding ER 2013-1006-091-L; King of Prussia Rail Project, Upper Merion Township, Montgomery County, and Upper Darby Township, Delaware County, Pennsylvania. September 26, 2016.

2016c Memo from Douglas McLearn, PA SHPO regarding ER 2013-1006-091-L; King of Prussia Rail Project, Upper Merion Township, Montgomery County, and Upper Darby Township, Delaware County, Pennsylvania. December 15, 2016.

### Rachleff, Allison

1996 *Pennsylvania Historic Resource Survey Form for Market Street Elevated Railway Historic District.* Prepared by CHRS Inc. for SEPTA. On file at Pennsylvania State Historic Preservation Office, Harrisburg, PA.

## **ATTACHMENTS**

**Attachment A: Figures**

**Attachment B: Photographs**

**Attachment C: Correspondence**

**Attachment D: PHRS Forms and Previous Documentation**