



One Bell Crossing
Selkirk, NY 12158
(518) 767-6049
William_Parry@csx.com

Date: May 24, 2023

To: Federal Railroad Administration, Signatory
Maryland State Historic Preservation Officer, Signatory
Pennsylvania State Historic Preservation Officer, Signatory
Maryland Department of Transportation, Port Administration, Signatory
Delaware County, Pennsylvania, Planning Department, Heritage Commission,
Concurring Party
Delaware Nation, Consulting Party
Delaware Tribe of Indians, Consulting Party
Baltimore Heritage, Consulting Party
City of Wilmington, Delaware, Department of Planning and Development, Consulting
Party
Delaware Department of Transportation, Consulting Party
Delaware State Historic Preservation Officer, Consulting Party
Preservation Maryland, Consulting Party

From: William Parry, Senior Manager of Environmental Remediation, CSX Transportation, Inc.

Re: Howard Street Tunnel Project, Section 106 Mitigation, Annual Report #2

Introduction

This annual report for the Howard Street Tunnel Project has been prepared pursuant to the requirements of the *Memorandum of Agreement Among the Federal Railroad Administration, Maryland State Historic Preservation Officer, Pennsylvania State Historic Preservation Officer, Maryland Department of Transportation Port Administration, and CSX Transportation Regarding the Howard Street Tunnel Project, Baltimore City, Maryland and Delaware County, Pennsylvania* (MOA), executed on May 25, 2021. The MOA requires an annual report be prepared and circulated to the Signatories, Consulting Parties, and Tribes commencing one (1) year from the MOA execution date (i.e., May 25, 2021) until project completion or the expiration of the MOA, whichever occurs first. In accordance with Stipulation XIV of the MOA, this report summarizes “work undertaken and any tasks completed related to adversely affected historic properties,” pursuant to the terms of the MOA, and includes “any scheduling changes proposed, problems encountered, and disputes and their resolution in the Signatories’ efforts to carry out the terms of [the] MOA.”

This second annual report provides a general status update on the progress of the Howard Street Tunnel project and summarizes the work undertaken pursuant to the MOA between May 25, 2022, and May 24, 2023.

Project Status Update

The Howard Street Tunnel Project consists of a number of project sites that are situated along the CSX rail corridor in Delaware, Maryland, and Pennsylvania. Since the project design and

contractor procurement processes are at different stages for the various project locations, construction activities will not commence concurrently at all locations. Based on the current status of these activities, the anticipated start of construction work at project locations near adversely affected historic structures are summarized below:

1. Boone Tunnel (Delaware County, Pennsylvania) – construction underway
2. Howard Street Tunnel (Baltimore, Maryland) – 4th quarter of 2023
3. Guilford Avenue Bridge (Baltimore, Maryland) – 3rd quarter of 2023
4. Harford Road Bridge (Baltimore, Maryland) – 3rd quarter of 2023
5. North Avenue Bridge (Baltimore, Maryland) – 4th quarter of 2023

Work Undertaken Pursuant to the MOA

The MOA stipulates four tasks to mitigate the adverse effects of the Howard Street Tunnel project on the seven historic properties identified. To assist with implementation of these stipulations, CSX employed cultural resources professionals who exceed the Secretary of Interior's *Professional Qualification Standards* for Architectural History, History, and/or Archaeology. Progress on each treatment measure is as follows.

- Stipulation IV.C. Update Historic Property Survey Files

Requirement:

The MOA requires CSX to update the following older historic property files of National Register of Historic Places (NRHP)-listed and eligible historic properties: Howard Street Tunnel & Power House (B-79), North Avenue Bridge (B-4521), Guilford Avenue Bridge (B-4526), Harford Road Bridge (B-4523), and Boone Tunnel (1997RE00650).

Status: Complete

This task was completed and details about implementation of this stipulation were included in the first annual report (2022). No additional work has been conducted since the previous annual report.

- Stipulation IV.D. Electronic Informational Platforms

Requirement:

The MOA requires CSX to develop content to be posted on MDOT MPA's website for the Howard Street Tunnel project "that provides a platform for the electronic storage and public dissemination of information and documents resulting from implementation of the stipulations in [the MOA]."

Status: On-going

CSX completed coordination with FRA, MDOT MPA, the Signatories, and Concurring Party on the proposed content to be included on the website in 2022. The details of the coordination were included in the first annual report (2022).

MDOT MPA updated the website (<https://mpa.maryland.gov/Pages/hst.aspx>) on February 21, 2023. Links to all documentation completed as mitigation for the project are included on the MPA website with the exception of the HAER documentation. Links will be

provided following receipt of National Park Service (NPS) Heritage Documentation Program's (HDP) formal acceptance of the documentation (see next bullet point). On April 13, 2023, CSX emailed the organizations listed on the website to inform them of the inclusion of a link to their respective websites on the Howard Street Tunnel Project website. A copy of the email notification, along with the one response received to date is included in **Attachment 1**.

- Stipulation IV.E. HAER Documentation

Requirement:

The MOA requires CSX to prepare HAER documentation for the following historic properties that contribute to the Baltimore and Ohio (B&O) Railroad Baltimore Belt Line: the Howard Street Tunnel, the North Avenue Bridge, the Guilford Avenue Bridge, and the Harford Road Bridge.

Status: Complete, Pending Formal NPS Acceptance of Documentation

CSX's qualified cultural resources consultant (QCRC) submitted the draft documentation to the NPS HDP's Philadelphia office for preliminary review on April 13, 2022. NPS HDP provided comments and requests for revisions, which CSX's QCRC completed and submitted for final review and approval on February 10, 2023. NPS HDP provided an informal approval by email on April 13, 2023 (**Attachment 2**). NPS has stated a formal letter of approval is forthcoming.

- Stipulation IV.F. Interpretive Display

Requirement:

The MOA requires CSX to "endeavor to develop, fabricate, and install an interpretive sign and/or display and place it at an appropriate mutually agreeable location for the Boone Tunnel." The MOA stipulated that CSX find "an interested and willing party" within six months of the MOA execution date and install within one year of the Howard Street Tunnel project's construction completion.

Status: Complete

The Darby Free Library in Delaware County, Pennsylvania was identified as an interested party willing to host the interpretive sign. CSX's QCRC developed draft sign content and layout. Following review of the draft sign content and layout by FRA and the Darby Free Library, the draft was provided for Signatory and Concurring Party review between August 23 and September 23, 2022. The Darby Free Library and FRA provided a final review of the sign mock-up in October and November 2022 and CSX's QCRC fabricated the sign.

On January 25, 2023, a representative from CSX and a representative of CSX's QCRC delivered the sign to the Darby Free Library. The library director, library staff, and staff from the Delaware County Planning Department (a Concurring Party) were in attendance.

Attachment 3 includes a copy of the sign and photographs of the sign inside the library.

In addition to the treatment measures required under Stipulation IV, the MOA prescribes additional actions for CSX to take regarding effects to historic properties.

- Stipulation V. Construction-Related Noise and Vibration Considerations

Requirement:

The MOA requires CSX to determine if the Cannon Shoe Company (B-5332) and any additional historic properties could potentially be affected by construction-related noise or vibration.

Status: On-going

CSX conducted noise and vibration assessments of each project area as part of the National Environmental Policy Act (NEPA) process. As a result of this effort, the potential for a noise or vibration impact to occur was identified at the historic Cannon Shoe Company. CSX, in coordination with FRA, developed a Noise and Vibration Control Strategy that outlines the process CSX will follow to further evaluate the potential for a noise or vibration impact to occur at the historic Cannon Shoe Company or any additional historic property, whether it would be deemed adverse and if so, what subsequent actions would be taken to protect the historic property. *To date, no additional historic properties have been identified as having the potential to be adversely affected by construction-related noise or vibration. Signatories, Concurring Parties, and Consulting Parties will be notified if CSX determines there is potential for an adverse effect to the Cannon Shoe Company and/or any additional historic property.*

- Stipulation VII. Unanticipated Discoveries

Requirement:

The MOA requires CSX to develop an Unanticipated Discoveries Plan (UDP) to “use if a previously undiscovered archaeological or historic architectural resources that is or reasonably could be a historic property is encountered during construction, or a previously known historic property will be affected in an unanticipated manner.”

Status: Complete

This task is complete. Details about implementation of this stipulation were included in the first annual report (2022). The UDP has been included in construction and bidding documents issued for the project to date and will be included in all future construction and bidding documents. As specified in the UDP, CSX’s QCRC prepared and printed posters and brochures to be posted and distributed to the construction contractors that included an archaeological resource identification guide and listed stop work requirements.

- Stipulation IX. Emergency Situations

Requirement:

The MOA requires CSX to take certain actions and notify the Signatories and Consulting Parties should an emergency situation occur during construction that has the potential to affect historic properties.

Status: No update since first annual report

In order to aid and streamline CSX’s response should this situation occur, CSX prepared an Emergency Procedures Plan outlining the process to be followed and notifications made. FRA reviewed the plan and it is on file with CSX.

- **Stipulation XIV. Monitoring and Reporting**

The MOA requires CSX to provide a written report to the Signatories and Concurring Parties annually beginning one year from the MOA execution date of May 25, 2021. The first annual report was sent via email on May 24, 2022. This report is the second annual report.

Questions about activities related to compliance with the Section 106 MOA should be directed to:

Laura van Opstal, RK&K (for CSX)
lvanopstal@rkk.com

Enclosures

Attachment 1: Howard Street Tunnel Project website notification email and response.

Attachment 2: NPS HDP informal approval of HAER documentation, April 13, 2023.

Attachment 3: Boone Tunnel interpretive sign photographs.

**Attachment 1: Howard Street Tunnel Project
website notification email and response**

Laura van Opstal

From: Laura van Opstal
Sent: Thursday, April 13, 2023 10:24 AM
To: Laura van Opstal
Cc: Parry, William; Bradley Smith
Subject: Notification Regarding the Howard Street Tunnel Project Website

Bcc: sdaniels@baltimoreheritagearea.org; eric.holcomb@baltimorecity.gov; hopkins@baltimoreheritage.org; secretary@borhs.org; JGray@borail.org; DA Director; outreach@padelcohistory.org; media@mdhistory.org; nredding@presmd.org; SSMITH@PRESERVATIONPA.ORG

Good morning,

On behalf of CSX Transportation, I am writing to notify your organization of ongoing mitigation efforts for the Howard Street Tunnel Project, which extends between Baltimore City, Maryland, and Philadelphia, Pennsylvania. As part of mitigation to resolve the adverse effect of the project on historic properties along the corridor, the Maryland Department of Transportation Port Administration (MDOT MPA) is hosting a webpage [[Pages - Howard Street Tunnel \(maryland.gov\)](#)] containing information about the project, the status of ongoing environmental work, and a summary of the historic property mitigation.

A link to your organization's website is included on the website to provide visitors an opportunity to learn more about historic properties in the vicinity of the project. If your organization is interested in sharing information about the project and the completed mitigation efforts summarized on the webpage, via a link to the project website on your website, email newsletter, social media, and/or other electronic platform, please contact me at lvvanopstal@rkk.com.

Please reach out with any questions. Thank you,
Laura

LAURA VAN OPSTAL
Project Architectural Historian



12600 Fair Lakes Circle, Suite 300
Fairfax, VA 22033

703.259.3707 D
www.rkk.com

Responsive People | Creative Solutions

Laura van Opstal

From: Johns Hopkins <hopkins@baltimoreheritage.org>
Sent: Thursday, April 13, 2023 10:47 AM
To: Laura van Opstal
Subject: Re: Notification Regarding the Howard Street Tunnel Project Website

EXTERNAL EMAIL: Do not click links or open attachments unless you trust the 'Sender' and know the content is safe.

Thanks for including us Laura. Johns

Johns Hopkins, Executive Director
[Baltimore Heritage](https://baltimoreheritage.org)
100 North Charles Street
Suite P101
Baltimore, MD 21201
410.332.9992
baltimoreheritage.org

On Thu, Apr 13, 2023 at 10:24 AM Laura van Opstal <lvvanopstal@rkk.com> wrote:

Good morning,

On behalf of CSX Transportation, I am writing to notify your organization of ongoing mitigation efforts for the Howard Street Tunnel Project, which extends between Baltimore City, Maryland, and Philadelphia, Pennsylvania. As part of mitigation to resolve the adverse effect of the project on historic properties along the corridor, the Maryland Department of Transportation Port Administration (MDOT MPA) is hosting a webpage [[Pages - Howard Street Tunnel \(maryland.gov\)](#)] containing information about the project, the status of ongoing environmental work, and a summary of the historic property mitigation.

A link to your organization's website is included on the website to provide visitors an opportunity to learn more about historic properties in the vicinity of the project. If your organization is interested in sharing information about the project and the completed mitigation efforts summarized on the webpage, via a link to the project website on your website, email newsletter, social media, and/or other electronic platform, please contact me at lvvanopstal@rkk.com.

Please reach out with any questions. Thank you,

Laura

**Attachment 2: NPS HDP informal approval of
HAER documentation, April 13, 2023**

Laura van Opstal

From: Porter, Jed M <jed_porter@nps.gov>
Sent: Thursday, April 13, 2023 9:09 AM
To: Laura van Opstal
Cc: Turton, Catherine
Subject: Documentation - Howard Street Tunnel Project

EXTERNAL EMAIL: Do not click links or open attachments unless you trust the 'Sender' and know the content is safe.

Greetings!

Thank you for your prompt revision of the reports, which completes the documentation. A formal Letter of Acceptance will be forwarded as soon as possible.

Roy Malcolm “Jed” Porter Jr., PhD, LEED AP

Architect

History and Preservation Assistance

National Park Service

Interior Region 1, North Atlantic - Appalachian

1234 Market Street - 20th Floor

Philadelphia, Pennsylvania 19107

Office: 215-597-1585

Mobile: 267-785-4432

**Attachment 3: Boone Tunnel interpretive sign
photographs**

DARBY'S HIDDEN TUNNEL

Hidden beneath Chester Pike between Cherry Street and Greenwood Road is Boone Tunnel, constructed by the Baltimore & Ohio (B&O) Railroad Company between 1883 and 1885. The Boone Tunnel is situated at the nexus of the Collingdale, Darby, and Sharon Hill boroughs of Delaware County, Pennsylvania.



Boone Tunnel southwest portal and retaining walls, looking northeast. October 15, 2021.

RAILROAD COMPETITION IN THE NORTHEAST CORRIDOR

Throughout the nineteenth century, railroads sought to dominate their competitors and secure access to the lucrative markets along what is today the Northeast Corridor, which stretches between Washington, DC, and New York City. The B&O was the first operational railroad in the United States and successfully constructed lines from Baltimore, Maryland, westward to the Ohio River Valley and beyond; however, the company struggled to access the Northeast Corridor.

In 1838, the Philadelphia, Wilmington & Baltimore (PW&B) Railroad completed tracks along the Delaware River, but no lines or stations served this area of Delaware County until 1872, when the PW&B moved its tracks inland and constructed a station in Sharon Hill at the corner of Sharon Avenue. This station spurred the residential development of Sharon Hill by wealthy Philadelphians. Both the B&O Railroad and the Pennsylvania Railroad, a direct competitor of the B&O, used the PW&B's tracks under lease agreements. In 1881, the Pennsylvania Railroad gained control of the PW&B, securing sole ownership of this coveted north-south route between Baltimore and Philadelphia, Pennsylvania.

THE B&O'S ROYAL BLUE LINE

Stung by the Pennsylvania Railroad's success, the B&O was forced to find an alternative route north. It constructed its own line, known as the Philadelphia Branch, from the east side of Baltimore to the eastern side of the Schuylkill River in Philadelphia through Delaware County, northwest of, but generally parallel to, the PW&B tracks. Construction of the line began in 1883, with the first regular Baltimore–Philadelphia passenger trains commencing in September 1886. The resulting route allowed the B&O to offer both passenger and freight service between Washington, DC, and New York City via Baltimore and Philadelphia. To navigate the topography of region, the B&O constructed three tunnels in the Philadelphia area, including the Boone Tunnel. The B&O marketed passenger service along the route as the Royal Blue Line, with passenger trains painted in a distinctive royal blue color. For nearly 70 years, it was the B&O's most prestigious rail line.



Boone Tunnel, looking northeast at the southwest tunnel portal and retaining walls, 1891 (Photo courtesy of the Library Company of Philadelphia)

Boone Tunnel is 30 feet wide, approximately 18 feet, 5 inches tall, and 627 feet long, with rough-cut stone retaining walls at the approaches and brick rings on the interior. The portals are stone, with stone voussoirs and prominent keystones with the date 1885. The tunnel was constructed using the cut-and-cover method, which involves digging a trench, constructing the tunnel in the trench, and covering the top of the completed tunnel with backfill material.

DEVELOPMENT NEAR BOONE TUNNEL

Before the construction of the railroads, this area of Delaware County was mostly undeveloped. The main thoroughfare was the “Queens Highway,” which follows the path of present-day Chester Pike. Prior to construction of the B&O Railroad, Maximillian LaRoche and Jacob Boon established the Collingdale Land Company and purchased land north of the tracks from Clifton Avenue to Springfield, extending as far north as Bartram Avenue. Once the B&O's route was completed, the area grew rapidly, as new residents could now take a train from the Collingdale station at Clifton Avenue into Philadelphia.



Collingdale Station, March 1891 (Photo courtesy of the Library Company of Philadelphia)

which are still standing. In 1892, the Chester, Darby and Philadelphia Railway Company built trolley lines along Chester Pike, on top of Boone Tunnel, spurring additional growth in the east ends of Collingdale and Sharon Hill, and the west end of Darby. The populations of Darby and Collingdale boroughs nearly doubled between 1900 and 1910. By 1929, the area was nearly completely developed with industrial buildings along the railroad tracks and a mix of single-family houses, duplexes, and rowhouses in the Collingdale, Darby and Sharon Hill boroughs. Commercial buildings were along Chester Pike adjacent to the tunnel.

DECLINE OF THE B&O RAILROAD AND CURRENT OPERATION OF THE LINE

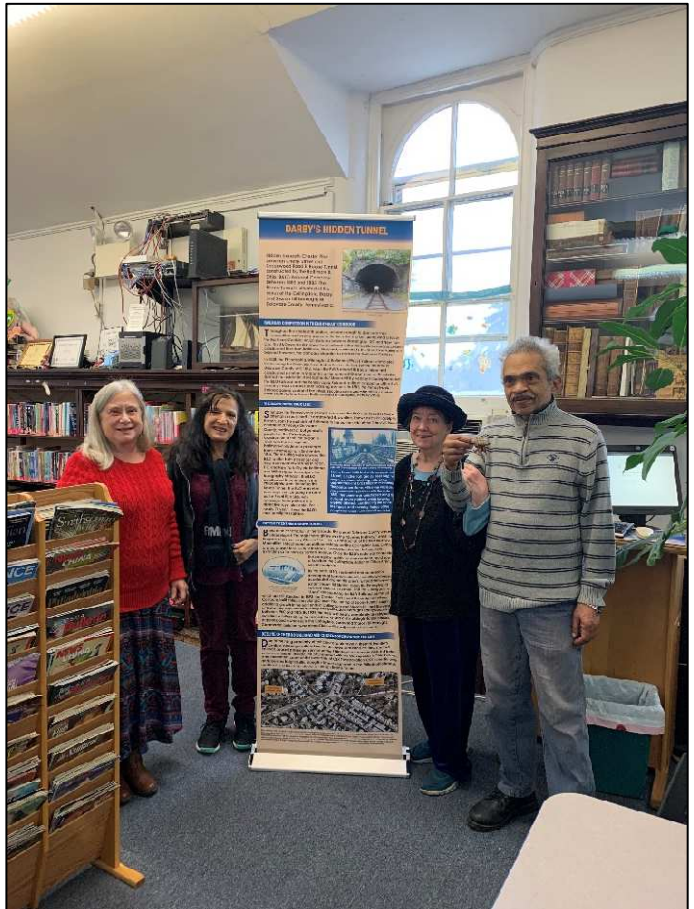
Due to the rising popularity of vehicular and air travel in the mid-twentieth century, passenger railroad service declined across the country. The B&O Railroad ceased passenger service on the Philadelphia Branch in 1958, but freight service continued. In 1987, the B&O merged with the Chesapeake & Ohio Railroad, which ultimately came under ownership of CSX Transportation. CSX currently owns and operates freight traffic along the former alignment of the Philadelphia Branch and the Royal Blue Line, including through Boone Tunnel.



This display was created by CSX Transportation and given to the Darby Free Library pursuant to stipulations required in a Section 106 Memorandum of Agreement between the Federal Railroad Administration, Maryland State Historic Preservation Officer, Pennsylvania Historic Preservation Officer, Maryland Department of Transportation Port Administration, and CSX Transportation to mitigate the adverse effects of the Howard Street Tunnel Project. The project includes track lowering and arch modification at the Boone Tunnel to allow for double stacking of freight along the Interstate 96 rail corridor between Baltimore, Maryland and Philadelphia, Pennsylvania.



Darby Free Library, Delaware County, Pennsylvania



Representatives from the Darby Free Library and the Delaware County Planning Department with the interpretive sign in the Darby Free Library