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Date: April 23, 2026

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 #5 (Final Report)

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 fifth 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 16, 2025, and April 23, 2026.

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. The current construction status near the adversely affected historic structures is summarized below:

1. Boone Tunnel (Delaware County, Pennsylvania) – Complete
2. Guilford Avenue Bridge (Baltimore, Maryland) – Complete
3. Howard Street Tunnel (Baltimore, Maryland) – Complete
4. Harford Road Bridge (Baltimore, Maryland) – In progress. Remaining work includes targeted demolition activities to facilitate remaining reconstruction work, track bed resurfacing beneath the bridge after clearance is achieved to accommodate track leveling and subsequent bridge deck-level finishing work. All remaining work is consistent with the work already included in Section 106 consultation for the project.
5. North Avenue Bridge (Baltimore, Maryland) – In progress. Remaining work includes targeted demolition activities to facilitate remaining reconstruction work and bridge deck-level finishing work. All remaining work is consistent with the work already included in Section 106 consultation for the project.

All construction is scheduled to be complete in 2026. No changes to the project design are anticipated, nor is any excavation. Remaining work does not have the potential to affect historic properties in ways not already considered through the Section 106 consultation for this project.

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 second annual report (2023).

- 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: Complete

Details about implementation of this stipulation were included the previous annual reports. Links to all documentation completed as mitigation for the project are included on the MPA website. *Per Stipulation IV.D.3., MDOT MPA will maintain the website content for a period of one year following completion of the HST Project construction.*

- 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

This task was completed and details about implementation of this stipulation were included in the third annual report (2024). No additional work has been completed since the third annual report (2024).

- 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

This task was completed and details about implementation of this stipulation were included in the second annual report (2023). No additional work has been conducted since the second annual report (2023).

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: Complete

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 on 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

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. No unanticipated discoveries have been found to date during project construction.

CSX and its qualified cultural resources consultant, RK&K, have reviewed changes to the project design throughout the project’s progression since the MOA’s execution in 2021, and have followed the consultation procedures included in Stipulation VI of the MOA regarding project changes. Consultation between FRA and MHT regarding the construction of a stormwater detention basin south of the Howard Street Tunnel’s south portal resulted in MHT’s concurrence with FRA’s decision to conduct archaeological monitoring of the construction work, due to archaeological potential in the work area. This consultation and monitoring followed the processes outlined in Stipulation VI and in the UDP. Monitoring of the work was conducted by an SOI-qualified archaeologist between September 25 and October 9, 2025. No archaeological resources were identified during the monitoring of ground-disturbing activities associated with the construction of the SWM detention basin, and no additional archaeological work was recommended for the project area. Refer to the enclosure to this report for a memorandum that provides details about the monitoring.

- 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. No emergency situations have arisen to date.

- **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, and commencing until the MOA expires or is terminated. The first annual report was sent via email on May 24, 2022. The second annual report was sent via email on May 24, 2023. The third annual report was sent via email on May 24, 2024. The fourth annual report was sent via email on May 15, 2025. This report is the fifth and final annual report. The MOA expires on May 25, 2026, five years after its effective date of execution, per Stipulation XV.A.

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

Enclosure: Memorandum, November 3, 2025: Howard Street Tunnel Project South Portal Location Stormwater Management Detention Basin Archaeological Monitoring



MEMORANDUM

700 East Pratt Street, Suite 500
Baltimore, MD 21202
Phone 410.728.2900
www.rkk.com

Date: November 3, 2025

To: Bill Parry, Senior Manager of Environmental Remediation, CSX Transportation, Inc.

From: Karen Hutchins-Keim, PhD, RPA, Cultural Resources Project Delivery Leader, RK&K

CC: Greg O'Hare and Laura van Opstal, RK&K

RE: Howard Street Tunnel Project South Portal Location Stormwater Management Detention Basin Archaeological Monitoring

The Federal Railroad Administration (FRA) is providing financial assistance to CSX Transportation for the proposed Howard Street Tunnel Project (Project). FRA previously consulted with the Delaware, Maryland, and Pennsylvania State Historic Preservation Officers (SHPOs) pursuant to Section 106 of the National Historic Preservation Act for the Project. Consultation resulted in 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.

In accordance with Stipulation VI of the MOA, FRA initiated additional consultation with the Maryland SHPO on September 19, 2024, to provide information about the changes to the Project in Baltimore, Maryland. That consultation included information about additional work near the south portal of the Howard Street Tunnel that included construction of a permanent stormwater management (SWM) detention basin. The SWM detention basin construction was to include removal of vegetation, including full removal of roots, as needed; possible swale and channel regrading; and SWM detention basin excavation to depths of approximately 7 feet.

FRA determined that, because a review of historic maps demonstrated that the area proposed for the construction of the SWM detention basin may contain archaeological potential associated with historic development present in that area that was removed and redeveloped with the early twentieth century B&O railyard and freight shed, archaeological monitoring would occur during the construction of these proposed project elements. The Maryland SHPO concurred with these recommendations on October 16, 2024.

Archaeological Monitoring Results

On behalf of CSX, archaeologists from RK&K, under the direct supervision of an archaeologist meeting the standards outlined in the SOI's *Professional Qualifications Standards for Archeology and Historic Preservation* (36 CFR Part 61), conducted archaeological monitoring of the excavation and ground disturbing activities associated with the construction of the SWM detention basin between September 25 and October 9, 2025. Archaeological monitoring followed stipulations provided in the Section 106 MOA and the Unanticipated Discoveries Plan prepared for the Howard Street Tunnel Project, and finalized in February 2022 as part of the implementation of the MOA stipulations.

Archaeologists observed fill deposits on top of naturally occurring hydric clay subsoil throughout the SWM Detention Basin project area (Figure 1 to Figure 8). Variable fill strata overlaid a light gray (10YR 7/1) clay mottled with yellowish brown (10YR 5/8) clay that appeared at the base of the excavation for the SWM basin (See Figure 3 and Figure 4). The fill strata contained rock, coal and small disarticulated brick fragments, and some modern trash. Electrical conduits ran throughout the project area at a depth of about 3 to 4 feet below current ground surface (see Figure 5 and Figure 6). Water began seeping into the base of

the excavation near the level where the hydric subsoil was encountered (see Figure 6). No intact buried living surfaces or cultural features were identified during the excavation for the SWM basin.

Conclusions and Recommendations

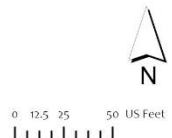
No archaeological resources were identified during the monitoring of ground disturbing activities associated with the construction of the SWM detention basin. No additional archaeological work is recommended for the project area.

Figure 1: Stormwater Management Detention Basin Project Area



- - - NEPA Reevaluation 5 Limits of Disturbance
- SWM Detention Basin Project Area

Source: October 17, 2025
 Near Map



**Howard Street
 Tunnel Project**

**SWM Detention Basin
 Archaeological Monitoring**

Figure 2: Stormwater Management Detention Basin Project Area, facing north



Figure 3: Stormwater Management Detention Basin Project Area. Hydric subsoils exposed in base of excavation.



Figure 4: Stormwater Management Detention Basin Project Area, facing east. Note multiple strata of fill deposits.

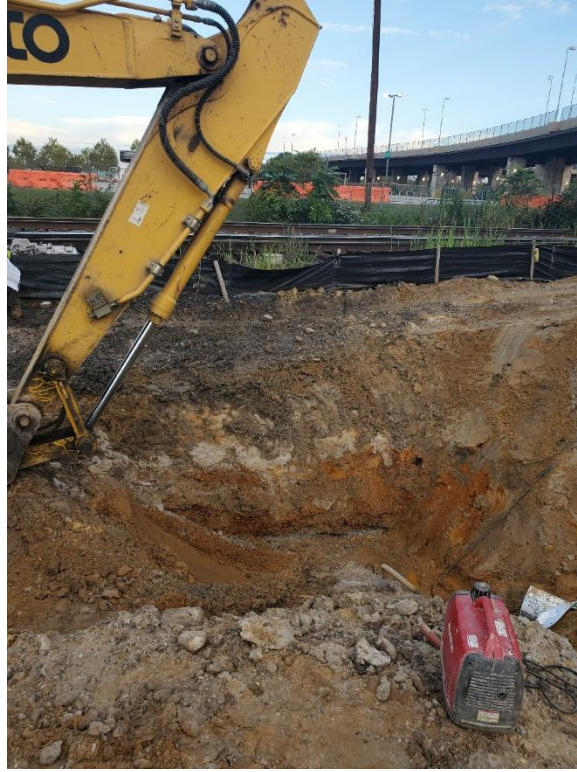


Figure 5: Stormwater Management Detention Basin Project Area, facing northwest. Note, electrical conduits.



Figure 6: Stormwater Management Detention Basin Project Area, facing east. Note electrical conduits and standing water.



Figure 7: Stormwater Management Detention Basin Project Area, facing north.



Figure 8: Stormwater Management Detention Basin Project Area

