

127 Hewett Road
Wyncote, PA 19095

March 22, 2017

Ms. Theresa Garcia Crews
Regional Administrator, Region III
U.S. Department of Transportation
Federal Transit Administration
1760 Market Street
Suite 500
Philadelphia, PA 19103-4124

VIA Cert. Mail No. 7016 0910 0001 7656 4533

Re: Section 106 Consultation SEPTA Jenkintown-Wyncote ADA Improvements
ER No. 2009-0756-091-E

Dear Ms. Garcia Crews:

As noted in our March 2, 2017 correspondence, this is the first time we have seen this project since being awarded Section 106 consulting party status back in 2009, which was regarding the former parking garage project. And it also appears that Cheltenham Township was caught by surprise as well. During the March 1, 2017 Cheltenham Township Board of Commissioners' Public Works meeting, township commissioners went on record stating that they had not met with or been informed by SEPTA of this project until February 23, 2017. Based on what we heard from SEPTA during that meeting, the project is at 30% completion; however, SEPTA's 2017 capital budget indicates the project design is 100% complete. This is troubling. Our understanding is that the consultation process should be conducted collaboratively and during the front end of project life cycle, typically during the planning phase and that a wide range of alternatives are to be considered. Since this has not happened, and for additional reasons stated below, we believe that the Section 106 review is premature.

While there is no question regarding the merits of ADA compliance, we are also concerned with preserving the historic Jenkintown-Wyncote (J-W) rail station's viability. The J-W Station is a contributing structure located within the Wyncote Historic District, listed on the U.S. National Register of Historic Places for exceptional architecture (October 1986). The station is also listed individually on

the National Register for transportation significance (December 2014). The current ADA plans do not incorporate or retain use of the existing historic station for transportation; rather, it is proposed that its transportation-related functions be replaced by a new structure located some 200-300 feet away on the opposite side of the Greenwood Avenue Bridge. Moving passengers away from the existing station building to a distant location on the other side of a bridge, and outside of the Wyncote Historic District, severs the transportation function from the Horace Trumbauer-designed building, which we believe will have an adverse effect based on National Register listing (Listing) Criterion A. With the building no longer being used for transportation, and with the remaining portions having been vacant since late 2009 or early 2010, there is less incentive to maintain state of good repair and sets the building up for demolition by neglect, having an adverse effect based on Listing Criterion C. Further, we believe that those portions of the subject project located outside of, but adjacent to, the relevant historical area boundaries have not been evaluated for their effect on historic resources.

As such, we disagree with the delineation of Area of Proposed Effect (APE) and the findings that there would be no Adverse Effect.

Project Description

Both the Area of Potential Effect Report and the Determination of Effects Report describe the station and adjacent surface parking lots as being located in an "inner suburban area with mixed land uses". While the areas immediately adjacent may contain mixed land uses, the area, as a whole, is primarily residential. Furthermore, while both reports note that "portions of the adjacent neighborhood" in Cheltenham Township are in the National Register-listed Wyncote Historic District, each fails to mention that the 108-acre Wyncote Historic District forms the entire westerly border of the property location. Ralph Morgan Park, part of the Cheltenham Township park system, is located immediately adjacent to the north west of the J-W station depot and is also within bounds of the Wyncote Historic District. In fact, exclusive of the south parking lot, the entire property location is within the Wyncote Historic District. See Figures 1 and 2 for relevant portions of the jurisdictional boundaries mapping.

Project Need and Design

The current project ADA design appears to be based on the former parking garage and new station depot project proposed to be located on the south surface parking lot. Except for the lack of a parking garage, it appears nearly identical to project that appeared on plans presented in 2008 - 2010. See Figure 3. However, those plans were dropped in 2010 and we were informed that there are no plans for a parking garage.

Part of the justification for moving the transportation related functions (ticketing, waiting areas, and bathrooms) to the south lot was the need to run longer trains, and thus longer platforms were required. However, that was almost ten years ago,

when SEPTA only had single-level coaches. Most recently, as reported by *PlanPhilly* on March 17, 2017,¹ SEPTA has announced plans to acquire 45 bi-level coaches for delivery in 2018. An earlier 2014 news article, also by *PlanPhilly*, indicated that needing to add more seats per train drove the shift towards bi-level coaches. However, to accomplish that would require adding more single-level cars to the trains that are already running. That in turn would require longer platforms, which would only be of benefit during rush hour, but would also present a drawback in areas like the section between Wayne Junction and Glenside (J-W lies between those two stations) because the longer trains could lead to traffic jam². That article also went on to quote SEPTA deputy general manager Jeff Knueppel, who stated that lowering tracks was being considered as one of the options for dealing with compatibility issues.

It appears, however, that these recent developments have not been taken into consideration. A comparison of the platforms from the previous project plan, Figure 4, and the subject project plan, Figure 5, indicate virtually no change in length. The arrival of bi-level coaches would seem to negate the need for longer platforms. That and SEPTA's openness to consider rail height adjustments should warrant the consideration of alternate ADA accessibility designs at the J-W station.

Project Scope and Phasing

Clarification is needed regarding the subject project's scope and phasing. The Determination of Effects report refers to the project as the "SEPTA Jenkintown-Wyncote Station Improvement Project", the same name used for the former project. The report also goes on to mention that this is the first phase of the project. No mention was made of the subsequent phases. Is the parking garage next? The current project's design certainly seems to indicate such. If so, then it, and any other design element or phase needs to be included in the current evaluation. The effect of the project as a whole needs to be determined; piecemeal review of individual project elements would preclude meaningful review under Section 106 guidelines.

No Consideration of Alternatives

As previously noted, conversion to bi-level coaches may ameliorate the need for high-level platforms, especially if rail tracks are lowered. Further, additional efficiencies gained from the new coaches would mean fewer coaches would need to be run together, resulting in shorter trains and reduced/no need for longer platforms. Alternatives to the current design include but are not limited to the following:

- Existing/new tunnel with an elevator;
- Existing/new tunnel with ramp/switchback ramp;

¹ <http://planphilly.com/articles/2017/03/17/septa-to-pick-massachusetts-based-company-to-build-bilevel-railcars-over-hyundai-rottem-in-south-philly>

² <http://planphilly.com/articles/2014/01/29/septa-may-purchase-bi-level-coaches>

- Raise existing platform;
- Raise existing station;
- Keep existing platform/extend existing platform with lowered tracks; or
- Move the proposed pedestrian skyway and access towers to the north side of Greenwood Avenue Bridge.

All of these alternatives help keep the existing historic station and structures as the focal point of this transportation hub, and may help make additional ancillary uses of that structure more viable. There are other benefits to keeping transportation activities on the north side of Greenwood Avenue Bridge, such as increased safety. The north side of the bridge is less remote than the south side, and easily visible from the Jenkintown Borough side of the existing J-W station, as well as from the Cheltenham Township side. There would also be fewer lost parking spaces.

Documentation of Cultural Resources (Area of Potential Effect Report)

The itemization of above ground resources and their respective National Register listing status, fails to indicate that Philadelphia & Reading Railroad Station: Jenkintown, was listed on the National Register in (December) 2014. Further, the "warehouse facility" on Glenside Avenue (Photo 1) is rather small and formerly housed an electrical contractor shop, printing press, and most recently, ancillary storage for Lincoln Investment, located within the Wyncote Historic District and situated on the opposite side of Glenside Avenue (Photo 2).

Public Involvement (Determination of Effects Report)

We take issue with the subject project relying on "public involvement" that occurred almost 10 years ago for a different, much larger project that by virtue of new construction, happened to be ADA compliant. There was never any consideration of adapting the existing structures to be ADA compliant. Instead, the focus was on constructing new facilities on the south surface parking lot. When the 2000 parking demand analysis used to justify the garage was refuted, SEPTA then claimed that the garage was needed for ADA purposes. And when several local architects demonstrated that ADA compliance could be achieved without the garage, they were dismissed, and told the garage was going to happen regardless. No alternatives to the garage were ever explored or seriously considered during that process, nor were any alternative plans or designs considered for a project that solely concerned ADA compliance.

Definition of Area of Potential Effect (Area of Potential Effect Report)

We also believe there is a need to expand the Area of Potential Effect (APE). The proposed APE is limited to just the station property. Both the remainder of the Wyncote Historic District and the Jenkintown Syndicate Subdivision are not only adjacent, but also much larger in area, higher in elevation, and have relevant sight lines, as they each overlook the project site. Nonetheless, they were not included. At a minimum, the APE should be expanded to include portions of the Wyncote

Historic District and Syndicate areas adjacent to property having relevant sight lines as indicated by Photos 3–26, which are keyed to a map and presented on Figure 6.

Definition of Effect (Determination of Effects Report)

We believe the definition of effect is incomplete and failed to comprehensively address the immediate and cumulative potential effects of the project, most significantly for the Wyncote Historic District. The project, in conjunction with an expanded APE, should have included an evaluation for not only change in physical features, but change in character of use (moving transportation functions to a new location); introduction of visual, atmospheric, or audible elements that diminish integrity, as a whole (J-W Station, Wyncote Historic District, and Jenkintown Syndicate viewshed analyses of towers, lighting, materials, noise from HVAC and elevator motors); neglect (vacancy of existing station building and potential for its demolition by neglect); and possible transfer, lease, or sale of property (existing station building).

The subject project not only modifies the canopies and existing drop off areas within the historic district, it also proposes decommissioning of transportation functions associated with the current station/depot. Further, the subject project proposes extended platforms, canopies, lighting, new passenger/ticket areas, multi-story elevator towers, and skyway, all of which are to be located adjacent to, but outside, the historic districts. The project needs to be reviewed as a whole, and the impacts of these additional aspects — the guts of the project — need to be evaluated for their effect on the fabric of the surrounding historic structures and neighborhoods.

Criteria of Adverse Effect (Determination of Effects Report)

As previously stated, we believe the review is premature, and with the height of the proposed structures, namely the elevator towers and skyway, being an unknown variable, there is no way to conduct a complete and meaningful analysis of impacts, which should preclude acceptance of the proposed determination.

Further, viewshed (including day and night lighting) and noise (HVAC and mechanical equipment elevated perhaps 50 feet in the air) analyses do not appear to have been conducted. But how could they have been, when the proposed structure's height is unknown? As a result, Hilltop Lane, portions of Woodland Road, Fernbrook, and Webster Avenues, and Cliff Terrace all could experience a visual and aural compromise of the Wyncote Historic District's fabric.

Finally, the current design is not in keeping with the Trumbauer style of architecture, nor materials, such as Wissahickon schist, slate on gable pitched roofs and the flat, membrane roof of the existing canopy.

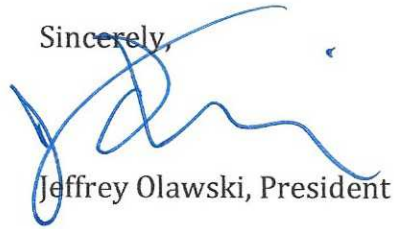
Summary/Concluding Remarks

We know that SEPTA is capable of achieving ADA compliance in keeping with an historic rail station's heritage. The historic Wayne, PA (Main Line) rail station is a

good example of taking an existing station with an historic building, and a pedestrian tunnel, and sympathetically adapting those elements to be ADA compliant. See Photos 27-31. SEPTA did a beautiful job there by keeping the historic integrity of the station and building ADA high-level platforms with switchback ramps to the tunnel. It is impressive. Wayne station is fully functional and passenger conveniences, such as gift and coffee shops, waiting areas, and bathrooms were included and housed in the existing station building.

Thank you for your time and opportunity to comment of the proposed Section 106 determinations.

Sincerely,



Jeffrey Olawski, President

Attachments

cc:

Daniel Koenig, FTA D.C Metro (via email)
Timothy Lidiak, FTA Phila. (via email)
Douglas McLearen, PHMC (via cert. mail no. 7016 0910 0001 7656 4540)
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