

APPENDIX C
CORRESPONDENCE



Commonwealth of Pennsylvania
Pennsylvania Historical and Museum Commission
Bureau for Historic Preservation
Commonwealth Keystone Building, 2nd Floor
400 North Street
Harrisburg, PA 17120-0093
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February 11, 2009

Gannett Fleming, Inc.
Attn: Kristin L. Civitella, Environmental Manager
P.O. Box 80794
Valley Forge, PA 19484-0794

RE: ER# 2009-0756-091-A
FTA: SEPTA Jenkintown-Wyncote
Station Improvement Project – Phase IA
Report, Cheltenham Township and
Jenkintown Borough, Montgomery County

Dear Ms. Civitella:

The Bureau for Historic Preservation (the State Historic Preservation Office) has reviewed the above named report in accordance with Section 106 of the National Historic Preservation Act of 1966, as amended in 1980 and 1992, and the regulations (36 CFR Part 800) of the Advisory Council on Historic Preservation as revised in 1999 and 2004. Our comments are as follows:

We agree with the recommendation that no archaeological testing is necessary for this project.

If you have any questions or comments regarding our review, please contact Mark Shaffer at (717) 783-9900.

Sincerely,

A handwritten signature in cursive script that reads "Mark Shaffer for".

Douglas C. McLearn, Chief
Division of Archaeology and Protection

cc: SEPTA



1. Table of All Consulting Party Comments and the Keyed Responses

No.	Annotation	Comment Category	Comment	Consulting Party	SSA Response
1.	ARE-053117-1	ADA	What specific ancillary work can we expect in achieving ADA accessibility?	Cheltenham Township	Refer to the project description for a summation of the scope of work included in the project.
2.	BHL-052217-1, ECE-032117-2	Design	The proposed design does not respect the linear nature of the station or its scale and massing, and its style is too closely matched to the existing building. The guidelines for the historic preservation note that new work should be differentiated from the old but compatible with existing materials, scale, mass, etc.	Cheltenham Township	This item is addressed in the second paragraph of page 2. "The design of the proposed overpass complex purposely avoids these features in the interest of avoiding associations with the Tudor Revival style. Doing so will differentiate the overpass from the existing building's design and character while still maintaining visual compatibility with the existing station building and adjacent structures located within the surrounding historic districts."
3.	JOL-032717-15	Design	The current design is not in keeping with the materials or styles of the Trumbauer architectural style	CCC	This is addressed in the second paragraph of page 2. "The design of the proposed overpass complex purposely avoids these features in the interest of avoiding associations with the Tudor Revival style. Doing so will differentiate the overpass from the existing building's design and character while still maintaining visual compatibility with the existing station building and adjacent structures located within the surrounding historic districts."
4.	BHL-052217-4	Design	Will the existing station's low-level platform be addressed? And, if so, will there be an additional shelter and ramp included on the south end of the platform to help distribute passenger load and decrease the train dwell times?	Cheltenham Township	This item is addressed in the 3rd point of the Project Description on page 3. "The new high-level platform will transition to the existing low-level platform via steps and an ADA compliant ramp."

5.	DML-033017-1	Design	The report notes that approximately 40' of the existing low-level platform canopy will be salvaged and raised to accommodate a new high-level platform. What is the full extent of the existing canopy as it now stands?	PA SHPO	The existing canopies are 443-feet and 629-feet long. As noted in 1st point of the Project Description, page 2, "...approximately 50 feet of the existing 443-foot canopy on the outbound side and 50 feet of the 629 feet of the existing inbound canopy north of the Greenwood Avenue..." will be salvaged and raised to accommodate the high-level platforms
6.	DML-033017-2, ECE-032117-4, ARE-053117-9	Design	If ticketing is removed from the existing station, what are the plans for the existing station? Will the station remain open to provide other amenities? What is the intended use of the existing outbound station once the high-level platforms constructed?	PA SHPO, Cheltenham Township	The introductory paragraph in of Project Description on page 2, states "Plan for adaptive reuse opportunities for the existing station building are currently being considered by SEPTA and would be completed as a separate undertaking, as adaptive reuse is outside the project's current scope."
7.	DML-033017-3	Design	Will catenaries within the railroad right-of-way need to be relocated as part of the project?	PA SHPO	The 1st point of the Project Description on page 3, states, "An 8-foot extension will be added to the columns on each side of the tracks..."
8.	ARE-053117-2	Design	What is the square footage of the new elevator towers/stairway?	Cheltenham Township	The total square footage of the elevator and stair towers is approximately 3000 square feet. Additional information on the size of the structures is included in the second paragraph of page 2
9.	ARE-053117-3	Design	What is the height of the elevator towers and would the towers be an architectural anomaly because of the possibility of it being the equivalent of a 4-story building?	Cheltenham Township	Per the second paragraph of page 2, "The elevator tower serving the new overpass structure will be approximately 47' above the existing parking lot elevation..." Also in the first paragraph of page 5, the elevator towers and pedestrian overpass will have a "comparable height to several buildings within the district," and "The overpass, stair, and elevator structure will also have a lower height than that of several commercial and residential buildings (Beaver Hill Condominiums, 101 Greenwood Avenue, and Pitcairn Offices) outside the surrounding historic district."

10.	ARE-053117-5, JOL-032717-4	Design	Questions had been made in previous comments about SEPTA's proposed use of double-decker cars, etc. and whether or not their use would impact the height of the proposed project in any way. Is there a need for the extended platforms with bi-level cars?	Cheltenham Township	The construction of the new high-level platforms are to provide accessible routes to board the train cars, regardless of the type of rail car. The type of car does not impact the height of the proposed structures
11.	ARE-053117-6	Design	We didn't discuss lighting, which is a factor impacting Historic District.	Cheltenham Township	Lighting designs will be developed in future design phases of the project and will be designed to provide the required lighting levels for the platform areas
12.	ARE-053117-8	Design	Why aren't grade crossings an option?	Cheltenham Township	Grade crossings present a serious safety concern for pedestrians and would require too great a distance for an acceptable accessible route between platforms.
13.	DML-033017-4	Design	What is planned for the underground tunnel?	PA SHPO	The existing underground tunnel is not included in the scope of the project
14.	JOL-032717-1	Design	Moving the passengers away from the existing station will have an Adverse Effect on National Register Listing Criterion A	CCC	Per Determination A of Table 11, on page 38 of the Effects Report, aside from alterations to salvage and raise the platform and canopy to create a high-level platform extension and the construction of a low-level handicap accessible ramp on the outbound platform, there will be no physical destruction or damage to property.
15.	JOL-032717-2	Design	If the existing station is no longer in use, it sets the building up for demolition by neglect, having an Adverse Effect based on listing Criterion C	CCC	Per Determination C of Table 11, on page 38 of the Effects Report, "There will be no removal of property from the Philadelphia & Reading Railroad Station: Jenkintown."
16.	JOL-032717-14, ECE-032117-5	Design	The project may introduce visual, atmospheric, or audible elements that diminish integrity of the Historic District	CCC, Cheltenham Township	Per the second point of the Project Description on page 2 of the Effects Report, the architectural designs for the new construction differentiate themselves from the existing structures while maintaining a visual compatibility with them.
17.	JOL-032717-16	Design	Why can't a similar practice like what is done at the historic Wayne Rail Station be implemented at Jenkintown?	CCC	The Jenkintown Station and Wayne Station sites present different challenges for achieving ADA compliance and consequently require differing design solutions.

18.	ECE-032117-4	Design	The impact to Wyncote Historic District view shed	Cheltenham Township	A limited portion of the Wyncote Historic District is included in the area of potential effect due to the existing terrain and vegetation.
19.	JOL-032717-5	Design Alternatives	Are there any plans for a parking garage?	CCC	A parking garage is not included in the scope of this project.
20.	ECE-032117-3, JOL-032717-7, JOL-032717-8, JOL-032717-9, JOL-032717-10	Design Alternatives	What are the design alternatives to a new pedestrian walkway?	Cheltenham B & Z Committee, CCC	Design alternatives have been explored and have been found infeasible for the project.
21.	JOL-032717-11	Design Alternatives	Move the proposed pedestrian skyway and access towers to the north side of Greenwood Avenue Bridge	CCC	Relocating the pedestrian overpass structures to the north of the Greenwood Avenue Bridge would have a significant impact on the existing historic fabric of the station and would place the structures directly within the limits of the Wyncote Historic District.
22.	BHL-052217-2, JOL-032717-6	Design Alternatives	Has locating a new elevator within the existing tunnel been considered? Doing so would decrease the cost of the project and lessen the possibility of compromising the cultural significance.	Cheltenham Township, CCC	Yes, the possibility of locating the elevator within the existing tunnel has been considered and found infeasible due to site limitations and the extensive impact on the existing historic fabric of the station.
23.	BHL-052217-3	Design Alternatives	Will the poor condition of the parking lot south of the Greenwood Avenue Bridge be addressed due to negative environmental impact is currently has on the site?	Cheltenham Township	Per point 2 of the Project Description on page 3, "Changes to the south lot are intended to be minimal and only as required to accommodate the other key elements of the work."
24.	ARE-053117-7	Design Alternatives	What can be done for those who need accessibility, but who refuse to ride in elevators?	Cheltenham Township	Elevators are an acceptable component of an ADA compliant accessible route. Those who refuse to ride in elevators need to find an alternate route to get to their desired destination.

25.	ARE-053117-4	Procedure	Why is there a lack of significance in describing the architects who designed buildings in the historic district?	Cheltenham Township	Per paragraph 1 one of the Historic Resources Affected by the ADA Improvement Project on page 4, the architects are noted in the National Register's Nomination Form, but they are not the primary reason for the Historic District being placed on the Register. The primary reason for its inclusion is as "an example of a wealthy turn of the century Philadelphia suburb," the wealth of the Nouveau Riche, in particular.
26.	DML-033017-5	Procedure	What is the condition of the historic canopy? The reports note that the new structure will match the profile and structural depths of the historic canopy; will it match materials as well?	PA SHPO	Refer to the project description for a synopsis of the existing canopy structure. The replacement canopy structure will match the materials of the existing structure.
27.	JOL-032717-13	Procedure	The APE should be expanded to include the portions of Wyncote that will potentially have sight lines compromised	CCC	The APE was established to include the portions of the Wyncote historic district that have potential for compromised sight lines.
28.	JOL-032717-12	Procedure	The National Register listing status fails to indicate that Philadelphia & Reading Railroad Station: Jenkintown was listed to the National Register	CCC	Per paragraph 3 of the abstract on page i of the Effects Report, the Philadelphia & Reading Railroad Station: Jenkintown is cited as being listed to the National Register in 2014.
29.	JOL-032717-3	Procedure	Why is the Wyncote Historic District only noted as being a "portion of the adjacent neighborhood" and why isn't the entire property aside from the south parking lot noted as being the Wyncote Historic District?	CCC	Per second introductory paragraph of the Project Description on page 1, it is noted that the adjacent neighborhood in Cheltenham Township, as well as the Jenkintown Station, "are part of the National Register listed Wyncote Historic District." Refer to Figure 2 for the limits of the eligible or listed properties.
30.	ECE-032117-1	Procedure	Lack of public notice and public meetings for the project	Cheltenham Township	SEPTA will continue to work with the surrounding neighbors over the course of the life of the project.
31.	ECE-032117-6	Procedure	Lack of notice to "interested parties" of the reports	Cheltenham Township	SEPTA will continue to work with the interested parties over the course of the life of the project.

Notation Legend
BHL-Brian Havir Letter
ARE-Anne Rappaport Email
DML-Douglas McLearn Letter
ECE-Edie Cerebi Email
JOL-Jeffrey Olawski Letter