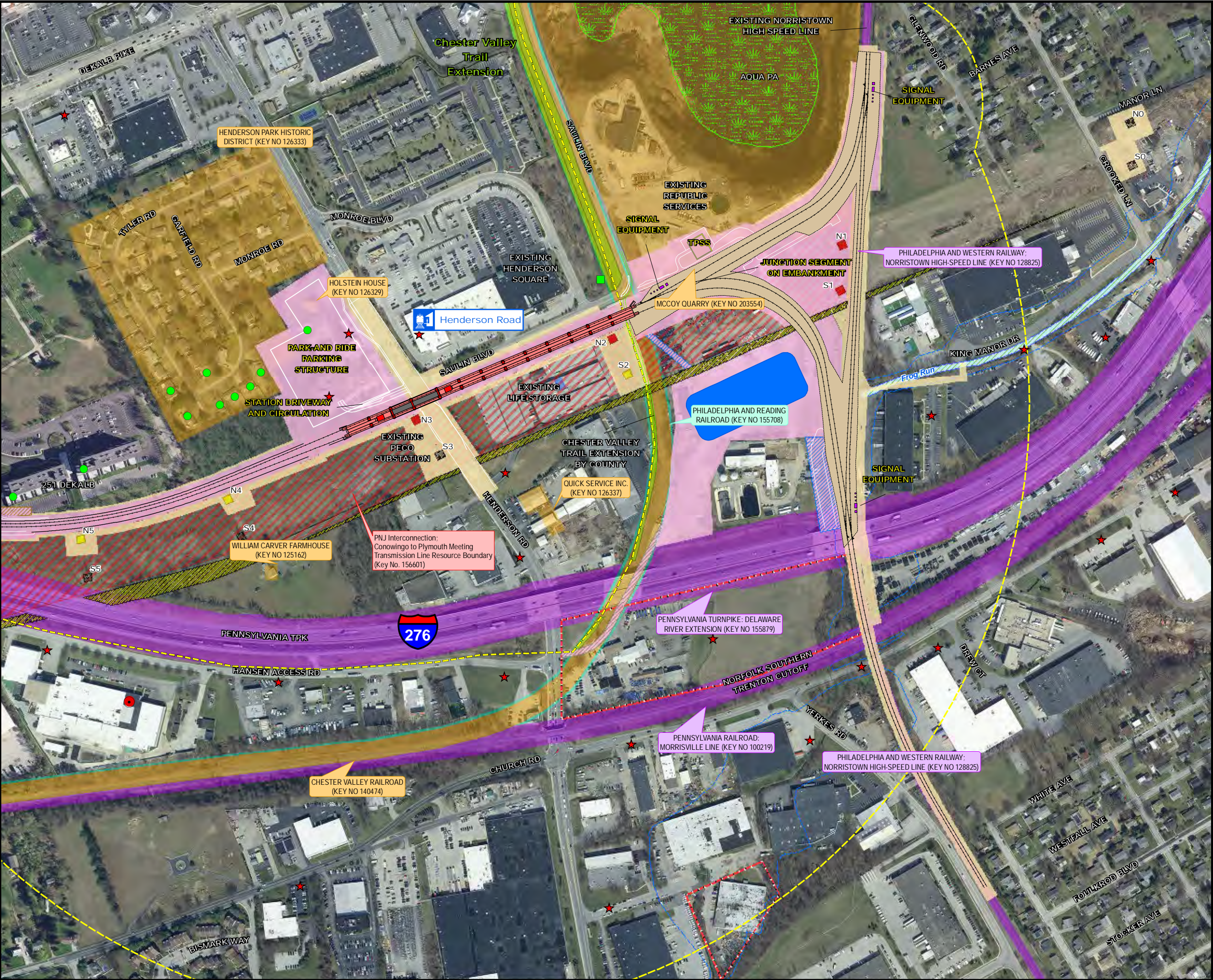





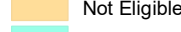
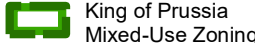
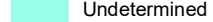

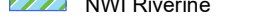
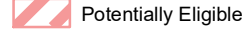
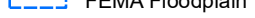
*A*ppendix A Maps

The following maps support the King of Prussia Rail Extension FEIS.




- Environmental Maps (5 sheets)
- Property Acquisitions Maps (4 sheets)

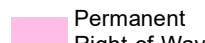

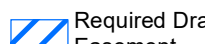
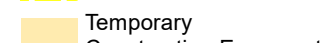
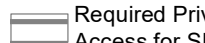
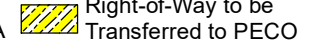

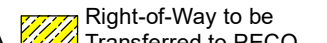







Preferred Alternative: Sheet: 1 of 4
KOP Rail FEIS




Environmental Features	Historic Architectural Resource
 Existing / Proposed	<u>Previously Identified</u>
 Chester Valley Trail	 Listed/Eligible
 Parks, Recreation & Open Space	 Not Eligible
 King of Prussia Mixed-Use Zoning	 Undetermined
 NWI Wetlands	<u>Evaluated & Recommended</u>
 NWI Riverine	 Potentially Eligible
 FEMA Floodplain	

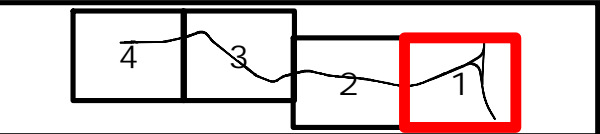
Impact - Noise	
 Cat 2 - No Impact	 Cat 3 - No Impact
 Cat 2 - "Moderate"	 Cat 3 - "Moderate"

Impact - HazWaste  Hazmat Site  NPL Site  TRI Site

Proposed Right-of-Way	
 Permanent Right-of-Way	 Project Study Area
 Required Drainage Easement	 Temporary Construction Easement
 Required Private Access for SEPTA	 Underground Structure Support Easement
 PECO Tower	 Right-of-Way to be Transferred to PECO
 PECO Tower - Possibly Replace	 PECO Tower - Replace

Proposed Storm Water Management	Proposed Improvement
 Above Ground	PARK-AND-RIDE PARKING STRUCTURE
 Above Ground - Existing	
 Underground	













 Aerial Structure	 Communication Equipment
 Aerial Support Structure	 Signal Equipment
 Embankment Area	 TPSS Location
 Pedestrian Overpass	 Other Improvements
 Station	





Not for Construction, Draft for Discussion.
















Preferred Alternative: Sheet: 2 of 4
KOP Rail FEIS










Environmental Features	Historic Architectural Resource
 Existing / Proposed	 <u>Previously Identified</u>
 Chester Valley Trail	 Listed/Eligible
 Parks, Recreation & Open Space	 Not Eligible
 King of Prussia Mixed-Use Zoning	 Undetermined
 NWI Wetlands	Evaluated & Recommended
 NWI Riverine	 Potentially Eligible
 FEMA Floodplain	

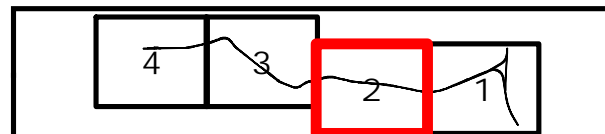
Impact - Noise	
 Cat 2 - No Impact	 Cat 3 - No Impact
 Cat 2 - "Moderate"	 Cat 3 - "Moderate"

Impact - HazWaste ★ Hazmat Site  NPL Site  TRI Site

Proposed Right-of-Way	
 Permanent Right-of-Way	 Project Study Area
 Required Drainage Easement	 Temporary Construction Easement
 Required Private Access for SEPTA	 Underground Structure Support Easement
 PECO Tower	 Right-of-Way to be Transferred to PECO
 PECO Tower - Possibly Replace	 PECO Tower - Replace

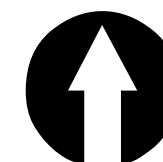
Proposed Storm Water Management	Proposed Improvement
 Above Ground	PARK-AND-RIDE PARKING STRUCTURE
 Above Ground - Existing	
 Underground	

 Aerial Structure	 Communication Equipment
 Aerial Support Structure	 Signal Equipment
 Embankment Area	 TPSS Location
 Pedestrian Overpass	 Other Improvements
 Station	



Not for Construction, Draft for Discussion.

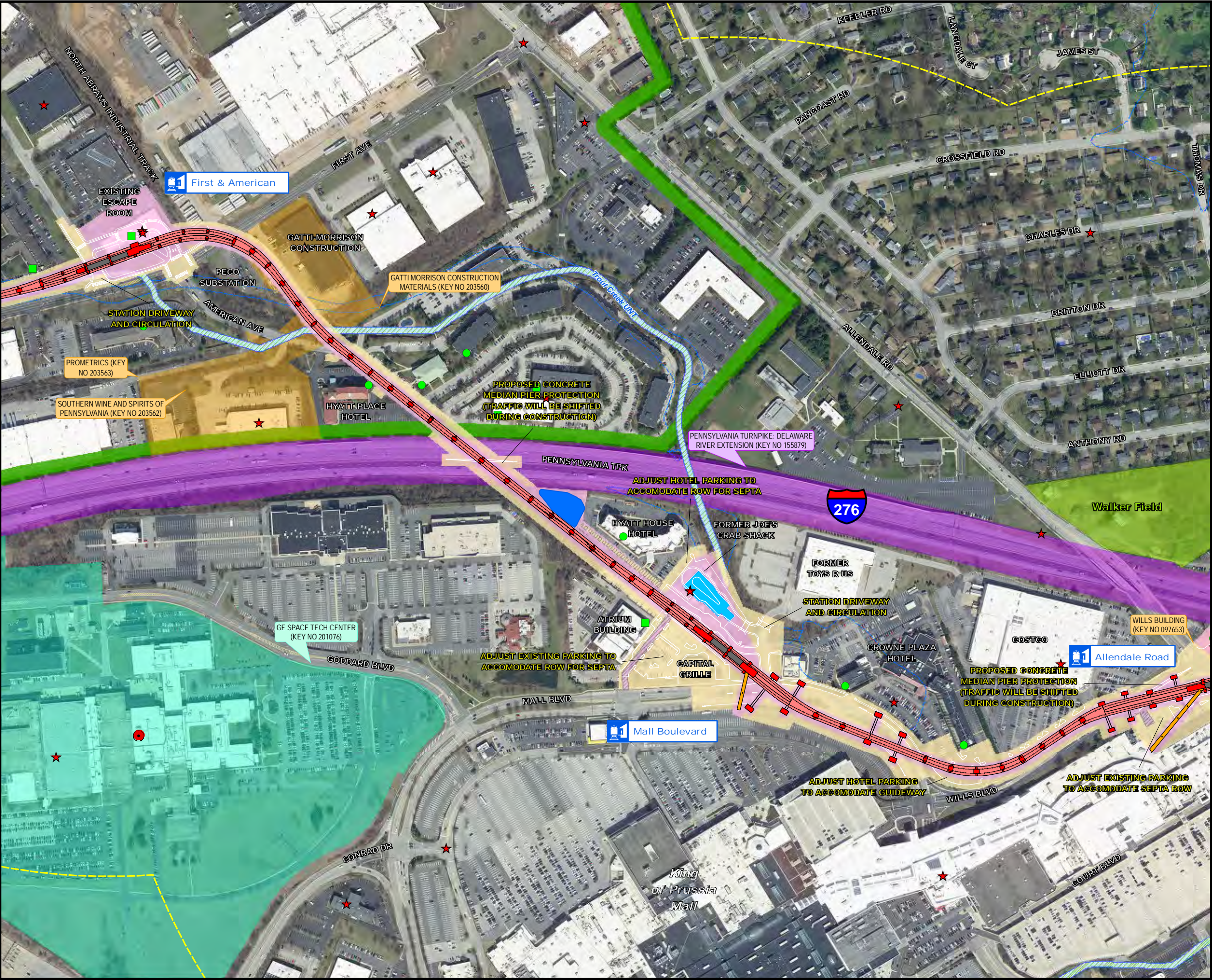
Date: 12/28/2020



0 200 400
Feet

1 inch = 400 feet

Source: 2018 PEMA Imagery, PASDA, PennDOT, HNTB & AECOM.



Preferred Alternative: Sheet: 3 of 4
KOP Rail FEIS

Environmental Features	Historic Architectural Resource
Existing / Proposed Chester Valley Trail	<u>Previously Identified</u>
Parks, Recreation & Open Space	Listed/Eligible
King of Prussia Mixed-Use Zoning	Not Eligible
NWI Wetlands	Undetermined
NWI Riverine	<u>Evaluated & Recommended</u>
FEMA Floodplain	Potentially Eligible

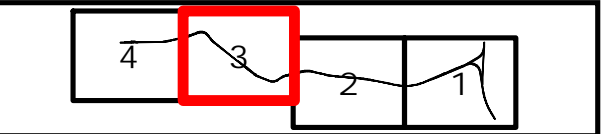
Impact - Noise	
Cat 2 - No Impact	Cat 3 - No Impact
Cat 2 - "Moderate"	Cat 3 - "Moderate"

Impact - HazWaste Hazmat Site NPL Site TRI Site

Proposed Right-of-Way	
Permanent Right-of-Way	Project Study Area
Required Drainage Easement	Temporary Construction Easement
Required Private Access for SEPTA	Underground Structure Support Easement
PECO Tower	Right-of-Way to be Transferred to PECO
PECO Tower - Possibly Replace	PECO Tower - Replace

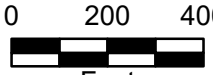
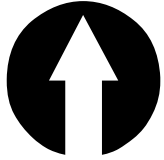
Proposed Storm Water Management	Proposed Improvement
Above Ground	PARK-AND-RIDE PARKING STRUCTURE
Above Ground - Existing	
Underground	

Aerial Structure	Communication Equipment
Aerial Support Structure	Signal Equipment
Embankment Area	TPSS Location
Pedestrian Overpass	Other Improvements
Station	



Not for Construction, Draft for Discussion.

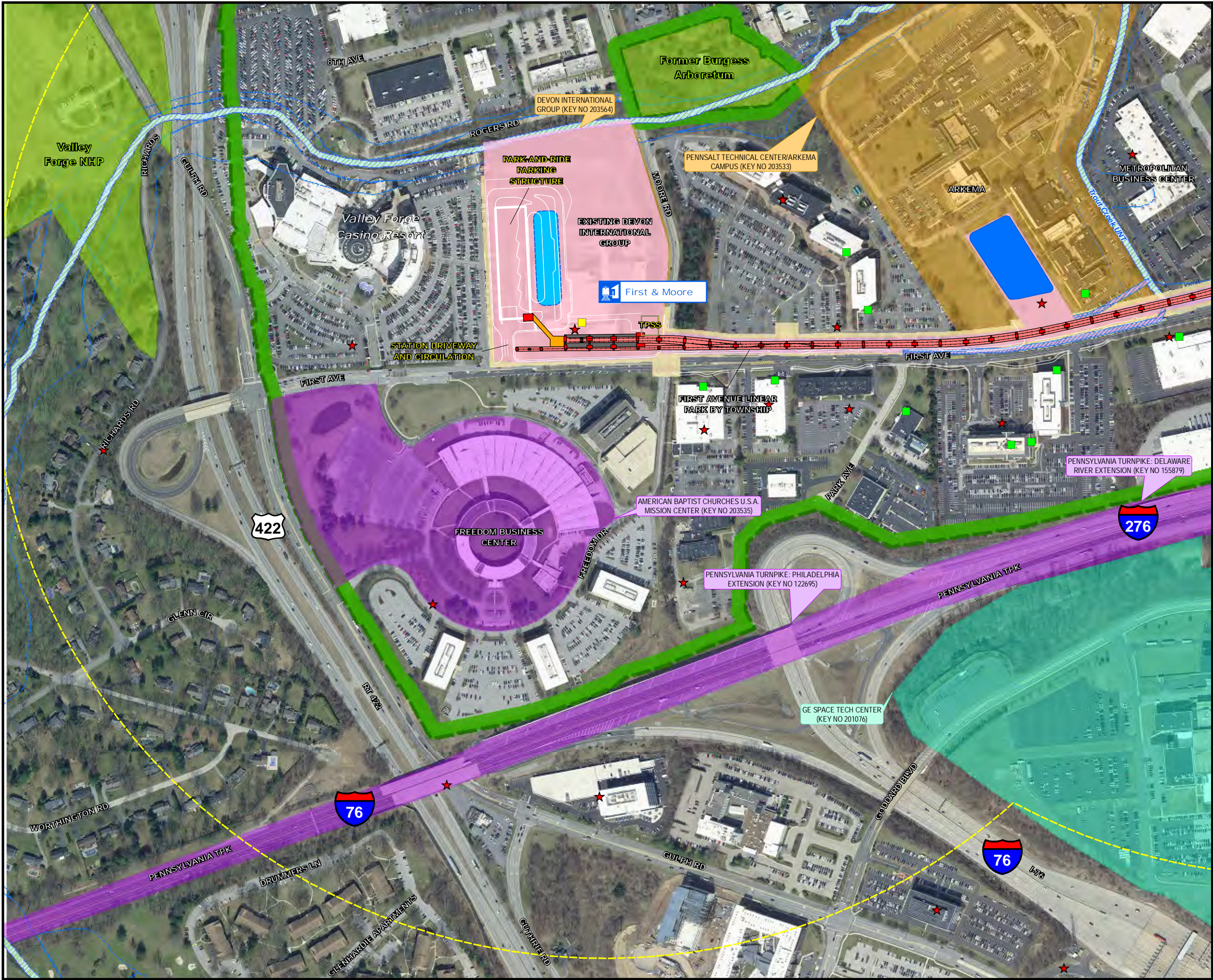
Date: 12/28/2020



1 inch = 400 feet

AECOM

Source: 2018 PEMA Imagery, PASDA, PennDOT, HNTB & AECOM.



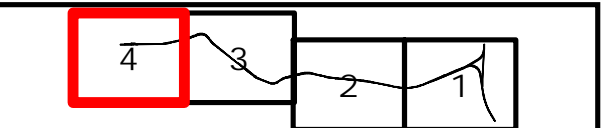
Environmental Features	Historic Architectural Resource
Existing / Proposed	<u>Previously Identified</u>
Chester Valley Trail	Listed/Eligible
Parks, Recreation & Open Space	Not Eligible
King of Prussia Mixed-Use Zoning	Undetermined
NWI Wetlands	<u>Evaluated & Recommended</u>
NWI Riverine	Potentially Eligible
FEMA Floodplain	

Impact - Noise	
Cat 2 - No Impact	Cat 3 - No Impact
Cat 2 - "Moderate"	Cat 3 - "Moderate"

Impact - HazWaste Hazmat Site NPL Site TRI Site

Proposed Right-of-Way	
Permanent Right-of-Way	Project Study Area
Required Drainage Easement	Temporary Construction Easement
Required Private Access for SEPTA	Underground Structure Support Easement
PECO Tower	Right-of-Way to be Transferred to PECO
PECO Tower - Possibly Replace	PECO Tower - Replace

Proposed Storm Water Management	Proposed Improvement
Above Ground	Communication Equipment
Above Ground - Existing	Signal Equipment
Underground	TPSS Location
Aerial Structure	Other Improvements
Aerial Support Structure	
Embankment Area	
Pedestrian Overpass	
Station	



Not for Construction, Draft for Discussion.




Preferred Alternative:
KOP Rail FEIS
69th Street
Transportation Center

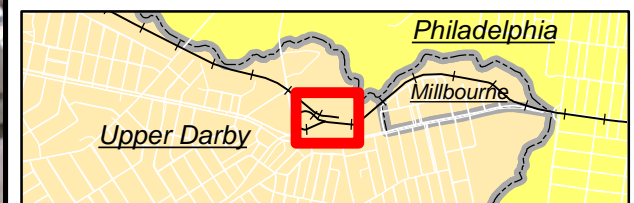
DEMOLISH EXISTING TRACK Proposed Improvement Call-Out

 Permanent Right-of-Way

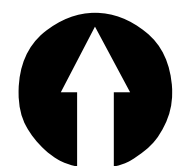
 Project Study Area

Proposed Improvements

 Station Improvement
 Other Improvements
 Track Alignment



Date: 12/1/2020



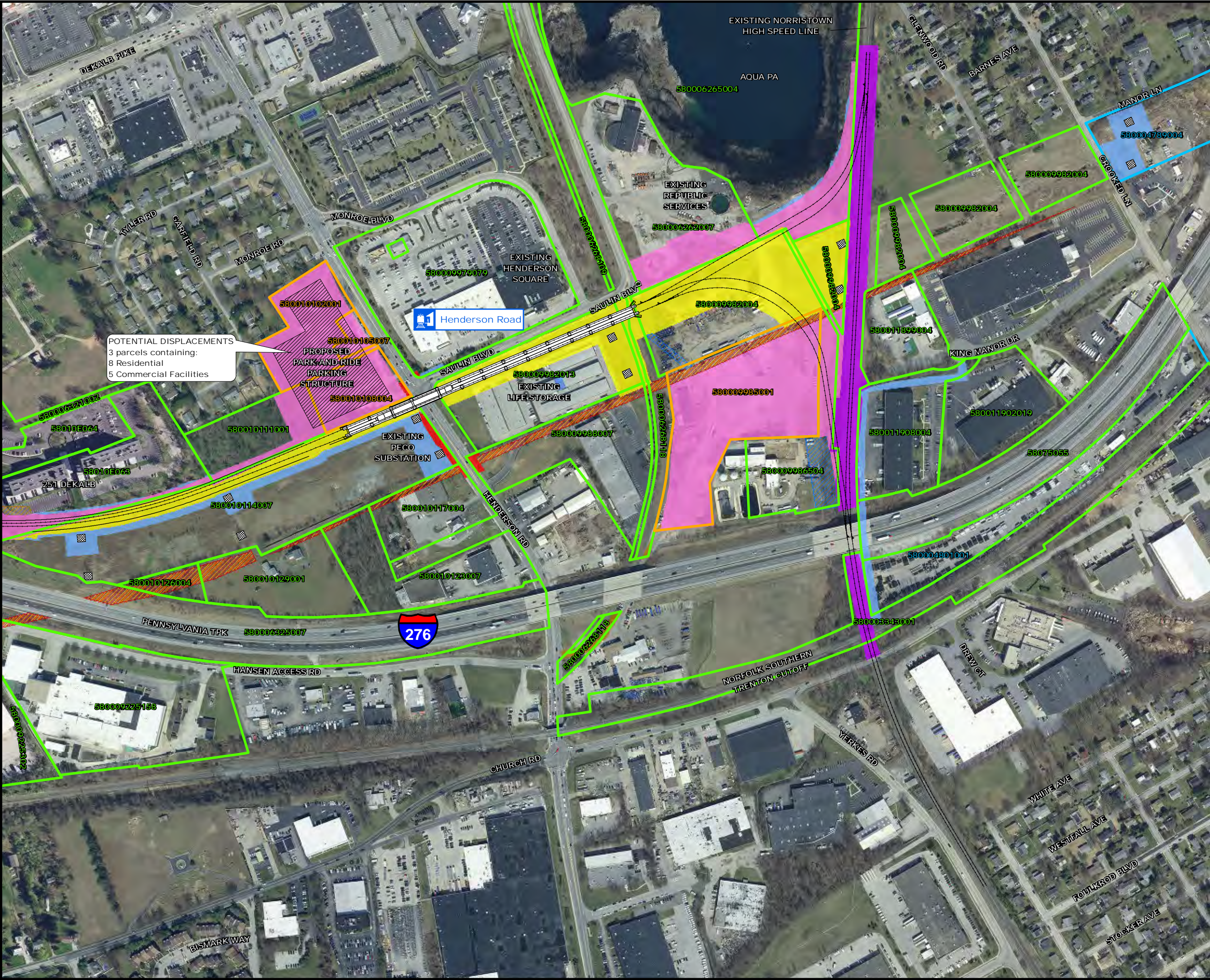
AECOM

0 75 150
Feet

1 inch = 75 feet

Source: 2018 PEMA Imagery, PASDA, PennDOT, HNTB & AECOM.





Parcel Boundary

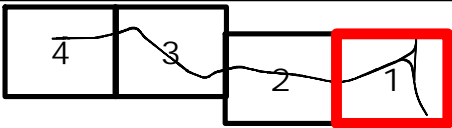
- Whole Acquisition
- Partial Acquisition
- Temporary Construction Easement

Type of Acquisition

- Drainage Easement
- Driveway Easement
- Henderson Road Reconstruction
- NHSL Work
- PECO (Construction)
- Required ROW
- Underground Easement
- Temporary Construction Easement
- To be acquired for PECO

Proposed Improvements

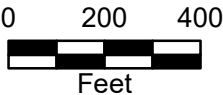
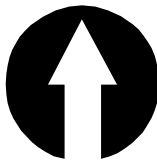
- Aerial Structure
- PECO Tower
- Proposed Park-and-Ride Structure
- Track Alignment



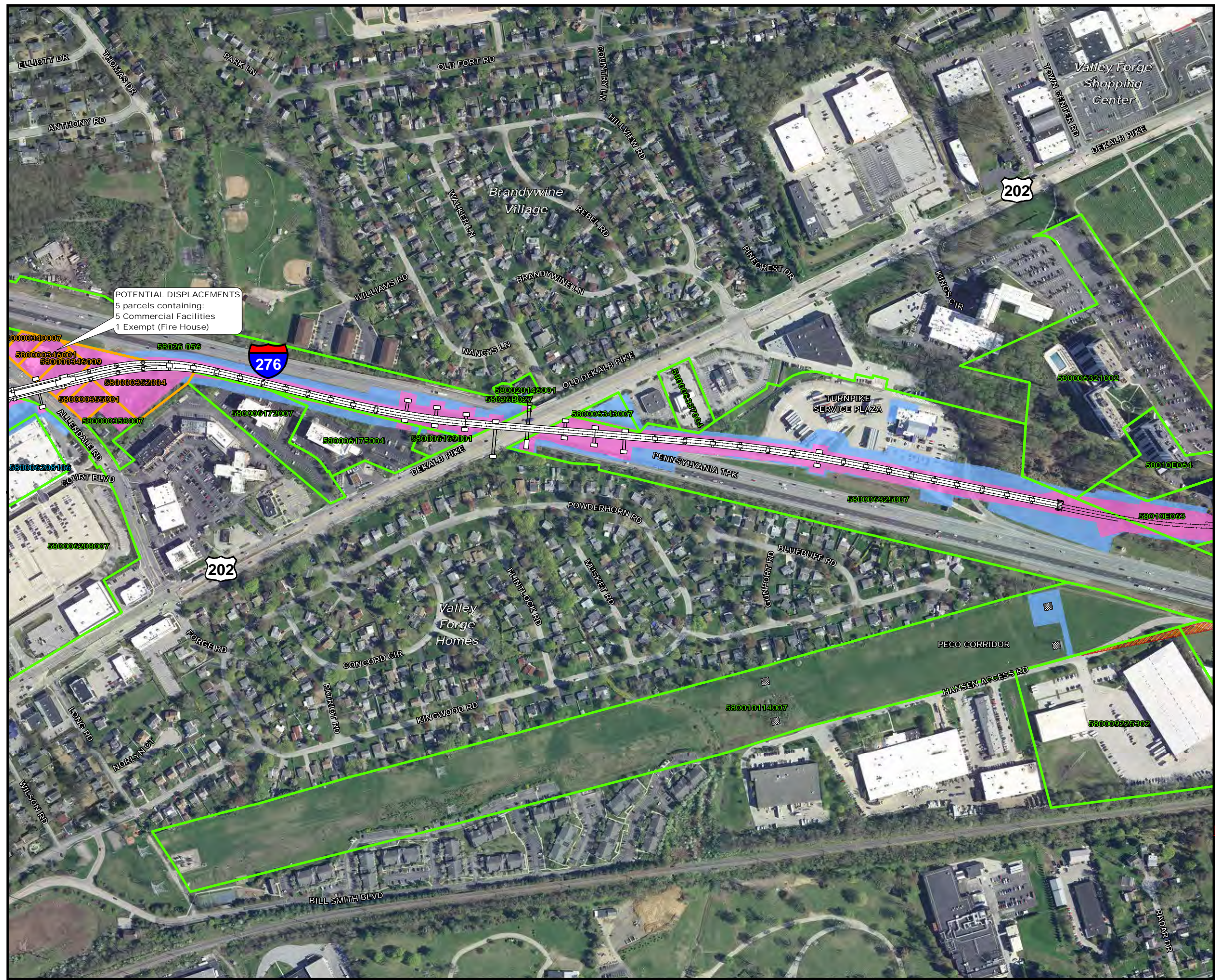
Not for Construction, Draft for Discussion.

Date: 10/11/2020

AECOM



1 inch = 400 feet



- Parcel Boundary
- Whole Acquisition

Partial Acquisition

Temporary Construction Easement
- Type of Acquisition
- Drainage Easement

Driveway Easement

Henderson Road Reconstruction

NHSL Work

PECO (Construction)

Required ROW

Underground Easement

Temporary Construction Easement

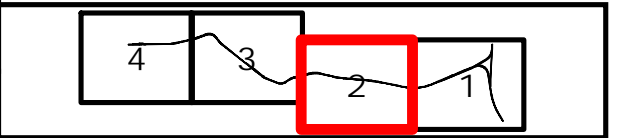
To be acquired for PECO

- Proposed Improvements
- Aerial Structure

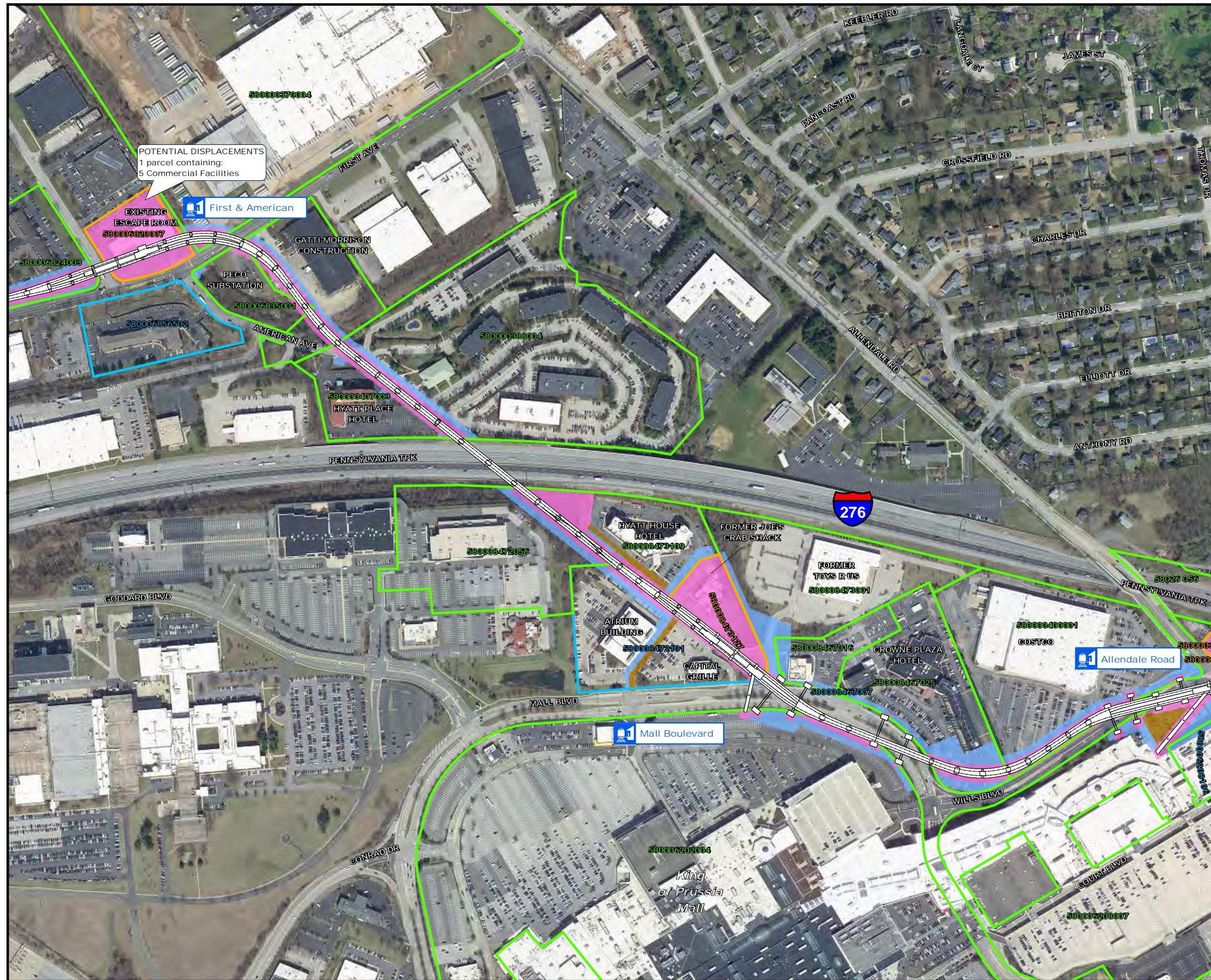
PECO Tower


Proposed Park-and-Ride Structure

Track Alignment



Not for Construction, Draft for Discussion.





Connecting Community with Opportunity

Preferred Alternative Sheet: 3 of 4

Property Acquisition

Parcel Boundary

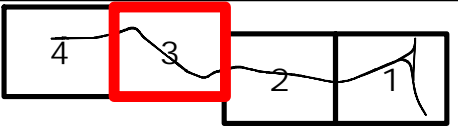
- Whole Acquisition
- Partial Acquisition
- Temporary Construction Easement

Type of Acquisition

- Drainage Easement
- Driveway Easement
- Henderson Road Reconstruction
- NHSL Work
- PECO (Construction)
- Required ROW
- Underground Easement
- Temporary Construction Easement
- To be acquired for PECO

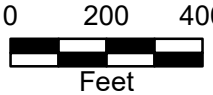
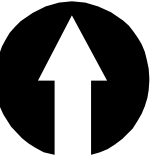
Proposed Improvements

- Aerial Structure
- PECO Tower
- Proposed Park-and-Ride Structure
- Track Alignment



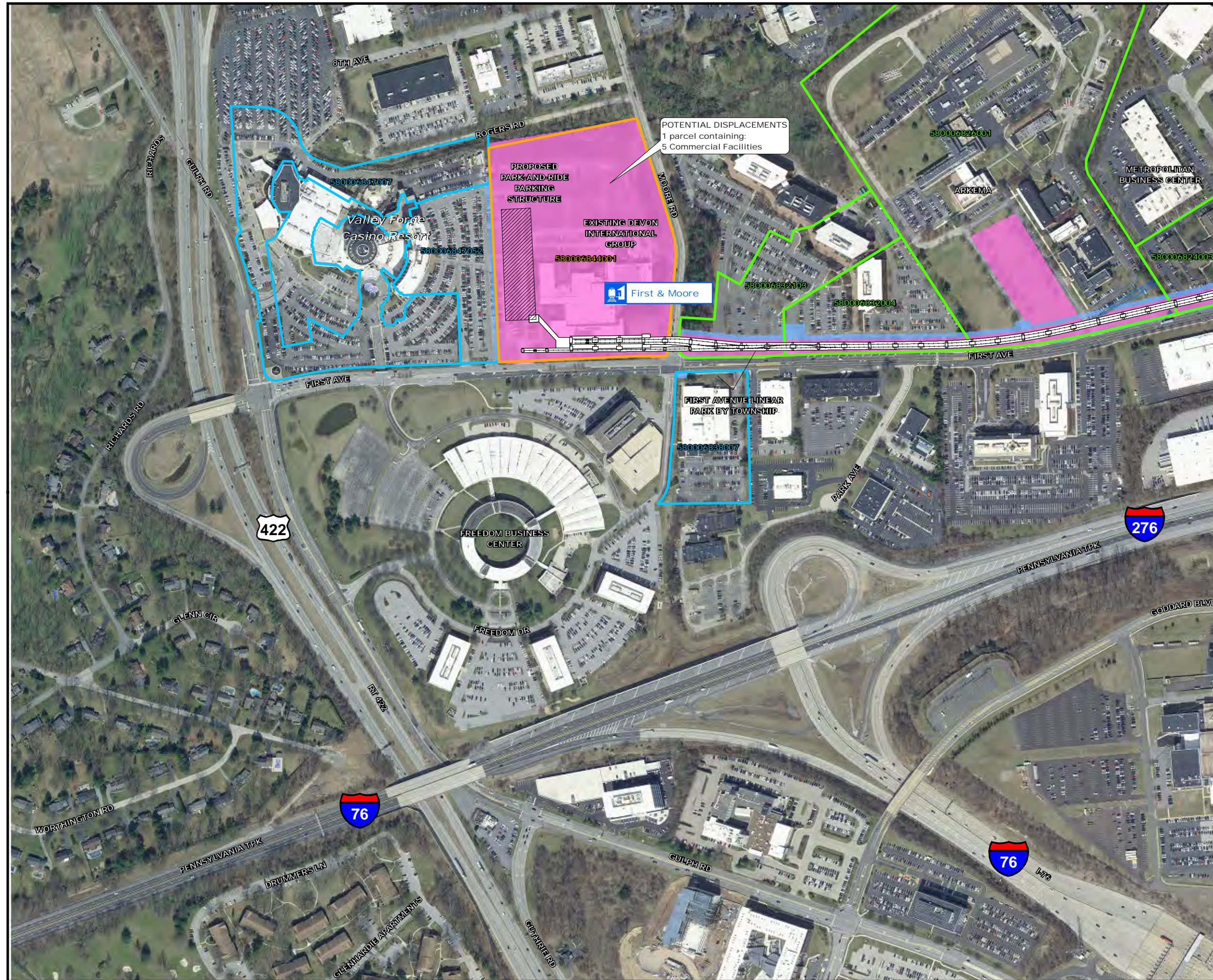
Not for Construction, Draft for Discussion.

Date: 10/11/2020






1 inch = 400 feet










Source: 2018 PEMA Imagery, PennDOT, M & S, HNTB & AECOM.







Parcel Boundary

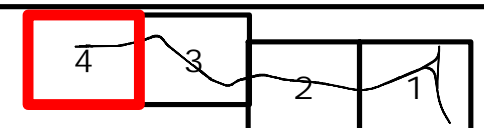
-  Whole Acquisition
-  Partial Acquisition
-  Temporary Construction Easement

Type of Acquisition

-  Drainage Easement
-  Driveway Easement
-  Henderson Road Reconstruction
-  NHSL Work
-  PECO (Construction)
-  Required ROW
-  Underground Easement
-  Temporary Construction Easement
-  To be acquired for PECO

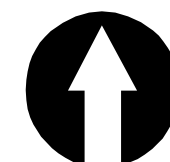
Proposed Improvements

-  Aerial Structure  PECO Tower
-  Proposed Park-and-Ride Structure
-  Track Alignment



Not for Construction, Draft for Discussion.

Date: 10/11/2020



0 200 400
Feet

1 inch = 400 feet

Source: 2018 PEMA Imagery, PennDOT, M & S, HNTB & AECOM.

*A*ppendix B Technical Memoranda and Reports

The following technical memoranda and reports support the King of Prussia Rail Extension FEIS and are on the Project website (www.kingofprussiarail.com).

- King of Prussia Rail Bus and Shuttle Service Plan Technical Memorandum
- King of Prussia Rail Environmental Data Resources Report
- King of Prussia Rail 15 Percent Basis of Design Report, Volume 1
- King of Prussia Rail 15 Percent Basis of Design Report, Volume 2
- King of Prussia Rail 15 Percent Design Submission
- King of Prussia Rail Final Section 4(f) Evaluation
- King of Prussia Rail Independent Cost Estimate Report
- King of Prussia Rail Noise and Vibration Technical Memorandum
- King of Prussia Rail/Norristown High Speed Line Extension Rail Operations Simulation
- King of Prussia Rail STOPS Ridership Forecasting Technical Memorandum
- King of Prussia Rail Traffic Impact Analysis

***A*ppendix C Agency Correspondence**

- FTA Notice of Intent, June 27, 2013
- Upper Merion Township Resolution of Support 2011-03
- Montgomery County Commissioners Scoping Letter, August 6, 2013
- USEPA Scoping Letter, August 14, 2013
- NPS Scoping Letter, August 15, 2013
- PA Turnpike Commission DEIS Comment Letter, August 12, 2013
- PNDI August 10, 2017
- PNDI August 7, 2020
- FTA Notice of Availability of the DEIS, October 17, 2017
- DEIS EPA Comment Email, November 27, 2017
- DEIS EPA Comment Letter, November 27, 2017
- USDOJ DEIS Comment Letter, November 30, 2017
- USFWS, October 13, 2017 with stamped 11/7/17
- PA Fish and Boat Commission, September 28, 2020
- FTA Letter to PA SHPO Re-opening Section 106, October 19, 2020
- PA SHPO Letter to FTA, Section 106 Concurrence, October 30, 2020
- E106 Form to ACHP, November 10, 2020
- ACHP Response Letter, November 19, 2020
- Section 106 Memorandum of Agreement, November 25, 2020
- FTA Email to PHMC on Section 4(f), December 21, 2020
- USDOJ Concurrence Letter on Section 4(f), December 22, 2020
- Montgomery County Concurrence Letter on Section 4(f),
December 24, 2020

Form Numbers: SF-269, SF-270, SF-272, SF-424, SF-3881, FAA Form 9550-5.

Type of Review: Renewal of an information collection.

Background: This program implements OMB Circular A-110, Public Law 101-508, Section 9205 and 9208 and Public Law 101-604, Section 107(d). Information is required from grantees for the purpose of grant administration and review in accordance with applicable OMB circulars. The information is collected through a solicitation that has been published by the FAA. Prospective grantees respond to the solicitation using a proposal format outlined in the solicitation in adherence to applicable FAA directives, statutes, and OMB circulars.

Respondents: Approximately 100 grantees.

Frequency: Information is collected on occasion.

Estimated Average Burden per Response: 6.5 hours.

Estimated Total Annual Burden: 650 hours.

ADDRESSES: Send comments to the FAA at the following address: Ms. Kathy DePaepe, Room 126B, Federal Aviation Administration, AES-200, 6500 S. MacArthur Blvd., Oklahoma City, OK 73169.

Public Comments Invited: You are asked to comment on any aspect of this information collection, including (a) Whether the proposed collection of information is necessary for FAA's performance; (b) the accuracy of the estimated burden; (c) ways for FAA to enhance the quality, utility and clarity of the information collection; and (d) ways that the burden could be minimized without reducing the quality of the collected information. The agency will summarize and/or include your comments in the request for OMB's clearance of this information collection.

Issued in Washington, DC on June 20, 2013.

Albert R. Spence,

FAA Assistant Information Collection Clearance Officer, IT Enterprises Business Services Division, AES-200.

[FR Doc. 2013-15323 Filed 6-26-13; 8:45 am]

BILLING CODE 4910-13-P

DEPARTMENT OF TRANSPORTATION

Federal Transit Administration

Intent To Prepare an Environmental Impact Statement for Increased Transit Service to King of Prussia, PA

AGENCY: Federal Transit Administration (FTA), DOT.

ACTION: Notice of Intent (NOI) to prepare an Environmental Impact Statement and Section 4(f) Evaluation.

SUMMARY: The FTA and the Southeastern Pennsylvania Transportation Authority (SEPTA) are planning to prepare an Environmental Impact Statement (EIS) and Section 4(f) Evaluation for increased transit service to King of Prussia, PA. The EIS will be prepared in accordance with regulations implementing the National Environmental Policy Act (NEPA), as well as FTA's regulations and guidance for implementing NEPA (40 CFR 1501.2 through 8 and 23 CFR 771.111). FTA is issuing this notice to solicit public and agency input regarding the scope of the EIS and to advise the public and agencies that outreach activities conducted by SEPTA and its representatives will be considered in the preparation of the EIS. SEPTA is undertaking this Draft EIS under current FTA regulations and guidance. SEPTA has indicated that it intends to seek FTA New Starts funding.

DATES: An Agency Scoping Meeting will be held on Tuesday, July 16, 2013 at 10:00 a.m., at the Radisson Hotel at the Valley Forge Casino Resort, South Ballroom, 1160 First Avenue, King of Prussia, PA, 19406. Persons should enter the hotel entrance to reach the South Ballroom. Representatives from federal, state, regional, tribal, and local agencies that may have an interest in the project will be invited to serve as either participating or cooperating agencies. A Public Scoping Meeting will be held on Tuesday, July 16, 2013 from 4:00 to 8:00 p.m. at the Radisson Hotel at the Valley Forge Casino Resort, 1160 First Avenue, King of Prussia, PA, 19406. Persons should enter the hotel entrance to reach the South Ballroom. An informational presentation explaining the proposed project will be held at 6:00 p.m. All persons are invited to provide oral comments on the scope of the EIS throughout the Scoping Meeting. Individuals wishing to speak are required to register as they sign in. Anyone needing special assistance should contact Mr. John Mullen, Outreach Coordinator at (215) 592-4200 or via email at info@kingofprussiarail.com, in advance

of the meeting. Spanish and sign language interpreters will be available at the Public Scoping Meeting.

Written comments on the scope of the EIS, including the project's purpose and need, the alternatives to be considered, and the impacts to be evaluated should be sent on or before August 14, 2013 via mail, fax or email to: Mr. Sheldon Fialkoff, Project Manager, AECOM, 1700 Market Street, Suite 1600, Philadelphia, PA 19103, 215-735-0883 (fax), Shelly.Fialkoff@aecom.com.

Written comments regarding the scope of the EIS can also be made via the project's Web site at www.kingofprussiarail.com on or before August 14, 2013.

FOR FURTHER INFORMATION CONTACT: Mr. Tony Cho, Community Planner, Federal Transit Administration, 1760 Market Street, Suite 500, Philadelphia, PA 19103, (215) 656-7250; or Mr. Byron Comati, Project Director, SEPTA, 1234 Market Street, 9th Floor, Philadelphia, PA 19107, (215) 580-3781. Additional project information and scoping materials will be available at the meetings and on the project Web site (<http://www.kingofprussiarail.com>).

SUPPLEMENTARY INFORMATION:

Scoping

FTA and SEPTA will undertake a scoping process that will allow the public and interested agencies to comment on the scope of the environmental review process. Scoping is the process of determining the scope, focus, and content of an EIS. NEPA scoping has specific objectives, identifying the significant issues that will be examined in detail during the EIS, while simultaneously limiting consideration and development of issues that are not truly significant. FTA and SEPTA invite all interested individuals and organizations, public agencies, and Native American tribes to comment on the scope of the Draft EIS. To facilitate public and agency comment, a Draft Scoping Document will be prepared for review and will be available at the meeting. Included in this document will be draft descriptions of the purpose and need for the project; the alternatives proposed; the impacts to be assessed; early alternatives that are currently not being considered; and the public outreach and agency coordination process.

Description of Study Area and Proposed Project

The Norristown High Speed Line (NHSL) currently provides passenger rail service between the 69th Street Transportation Center (in Upper Darby)

and the Norristown Transportation Center (in the Municipality of Norristown), serving the Main Line area in Delaware and Montgomery Counties, Pennsylvania. At the 69th Street Transportation Center, connections can be made to Center City Philadelphia via SEPTA's Market-Frankford Line, SEPTA's Route 101 and 102 Trolleys, and 18 SEPTA bus routes. Besides service to Norristown, Upper Darby and on to Philadelphia, the NHSL serves a number of important origins and destinations along its line such as Haverford College, Bryn Mawr College, Villanova University, Eastern University, Cabrini College, Rosemont College, as well as Bryn Mawr Hospital.

Even though the NHSL passes through Upper Merion Township, which includes the King of Prussia area, the rail line runs about two to three miles east of many major activity centers in the area, including the King of Prussia Mall. Reaching the King of Prussia area from the NHSL currently requires a transfer to bus service. Six SEPTA bus routes serve the area and ridership has been increasing over the past several years. The area is at the confluence of several major highways; the Pennsylvania Turnpike, I-76 (Schuylkill Expressway), Route 422, and Route 202. These highways suffer from growing congestion and delays; bus travel on these roadways is subject to the same congestion and delays.

In addition to the King of Prussia Mall, the study area encompasses other major destinations that are focal points of employment density, residential density, and/or trip attractions. The study area is bounded roughly by the Schuylkill River, Route 422, I-76 (Schuylkill Expressway) and the existing NHSL. The study area has a large amount of commercial activity, including business, hotel and light industrial warehouse uses and is home to employers such as Lockheed Martin, GSI and Arkema. Additionally, the study area contains the Valley Forge Convention Center and Casino Resort and Valley Forge National Historical Park, which are regional destinations.

Project Background

The concept of providing improved transit access to the King of Prussia and Valley Forge areas dates back many years. A deficiency in rail transit services to the study area has been identified in various forms for more than 20 years in regional transportation studies and in Upper Merion Township's adopted Land Use Plan. In 2003, SEPTA completed the Route 100 Extension Draft Alternatives Analysis (AA). This study, conducted in

accordance with FTA guidelines, identified a full range of alternatives, screened alternatives and evaluated the feasibility and costs of alternatives to extend the NHSL to the study area. The study identified and evaluated four different alignments between the NHSL and the King of Prussia Mall, and it identified a feasible alignment beyond the mall. The study was coordinated with other studies then occurring for SEPTA's proposed Cross-County Metro and Schuylkill Valley Metro services. Copies of these previous studies are available at SEPTA, 1234 Market Street, 9th Floor, Philadelphia, PA 19107, (215) 580-7919 or (215) 580-3781.

Purpose of and Need for the Proposed Project

The purpose of the proposed project is to provide a faster, more reliable public transit service that offers improved transit connections to the King of Prussia/Valley Forge area from communities along the existing Norristown High Speed Line, Norristown and Philadelphia; improve connectivity between major destinations within the King of Prussia/Valley Forge area; better serve existing transit riders; and accommodate 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 underserved, or currently not served, by public transit. These needs are strengthened by growing travel demands in the King of Prussia and Valley Forge areas generated by existing and future economic development opportunities.

Proposed Alternatives

The Draft EIS will evaluate various alternative transit alignments to make the connection between the NHSL and destinations in King of Prussia. The preliminary list of alternatives to be considered in the Draft EIS will include the following No Build Alternative and various Build Alternatives:

- *No Build Alternative:* Represents future conditions in the EIS analysis year of 2040 without the proposed project. The No Build Alternative includes the existing transit and transportation system in the region plus all projects in the region's fiscally constrained long range transportation plan. The No Build Alternative is included in the Draft EIS as a means of comparing and evaluating the impacts and benefits of the Build Alternatives.
- *Build Alternatives:* The Build Alternatives are based on an initial feasibility analysis. Build Alternatives

will include alternative transit alignments, station locations, and design configurations that could meet the project's purpose and need. The range of Build Alternatives will include those reasonable alternatives uncovered during public scoping and are to be the outcome of a tiered screening and alternatives definition process that will primarily use existing transportation or utility rights of way. These rights of way include elevated rail service along a PECO energy alignment, alignments along Route 202 and Interstate 276, as well as alignments along inactive freight rail tracks and other public streets north of the King of Prussia Mall. The full range of alternatives will be subjected to this tiered screening and alternatives definition process in order to arrive at the subset of the most reasonable Build Alternatives that will undergo detailed study and evaluation within the DEIS.

- No bus alternatives on existing travel lanes will be studied in the DEIS because SEPTA already provides 6 different bus routes to the King of Prussia/Valley Forge areas, including express bus service from Center City Philadelphia. Given the study area's extensive road congestion, additional bus service is not a feasible alternative. Bus riders are subject to the same congestion delays as motorists, as buses share the roadway travel lanes. In particular, increased or improved bus service is not feasible on I-76, the primary highway corridor from Center City Philadelphia, because of high levels of congestion and limitations of the terrain do not allow for additional lane capacity. For example, two of the current SEPTA bus routes, which run the longest distance on I-76, have the lowest cumulative on-time performance in the entire SEPTA bus system.

Probable Effects

FTA and SEPTA will evaluate project-specific direct, indirect, and cumulative effects to the existing physical, social, economic, and environmental setting in which the Build Alternatives could be located. The permanent, long-term effects to the region could include effects to traffic and transportation, land use and socio-economics, visual character and aesthetics, noise and vibration, historical and archaeological resources, community impacts, and natural resources. Temporary impacts during construction of the project could include effects to transportation patterns, air quality, noise and vibration, natural resources, and contaminated and hazardous materials. The analysis will be undertaken in conformity with all Federal environmental laws, regulations, and

executive orders applicable to the proposed project during the environmental review process to the maximum extent practicable. These requirements include, but are not limited to NEPA, Council on Environmental Quality regulations, FTA guidance and relevant environmental guidelines, Section 106 of the National Historic Preservation Act, Section 4(f) of the Department of Transportation Act, Executive Order 12898 regarding minority and low-income populations, Executive Order 11990 regarding the protection of wetlands, the Clean Water Act, the Endangered Species Act of 1973, and the Clean Air Act of 1970, along with other applicable Federal and State regulations. Opportunities for comment on the potential effects will be provided to the public and agencies, and comments received will be considered in the development of the final scope and content of the EIS.

Public and Agency Involvement Procedures

The regulations implementing NEPA and FTA guidance call for public involvement in the EIS process. In accordance with these regulations and guidance, FTA/SEPTA will:

(1) Extend an invitation to other Federal and non-Federal agencies and Native American Tribes that may have an interest in the proposed project to become participating agencies (any interested agency that does not receive an invitation can notify any of the contact persons listed earlier in this NOI);

(2) Provide opportunity for involvement by participating agencies and the public to help define the purpose and need for the proposed project, as well as the range of alternatives for consideration in the EIS; and

(3) Establish a plan for coordinating public and agency participation in, and comment on, the environmental review process.

Input on a Public Involvement Plan and Agency Coordination Plan will be solicited at the scoping meeting and on the Web site. The documents will outline public and agency involvement for the project. Once completed, these documents will be available on the project Web site or through written request.

The Paperwork Reduction Act

The Paperwork Reduction Act seeks, in part, to minimize the cost to the taxpayer of the creation, collection, maintenance, use, dissemination, and disposition of information. Consistent with this goal and with principles of

economy and efficiency in government, it is FTA policy to limit, insofar as possible, distribution of complete printed sets of NEPA documents. Accordingly, unless a specific request for a complete printed set of the NEPA document is received before the document is printed, FTA and its grant applicants will distribute only electronic copies of the NEPA document. A complete printed set of the environmental document will be available for review at the grant applicant's offices and elsewhere; an electronic copy of the complete environmental document will be available on the grant applicant's project Web site, <http://www.kingofprussiarail.com>.

Summary/Next Steps

With the publication of this NOI, the scoping process and the public comment period for the project begins, allowing the public to offer input on the scope of the EIS until August 14, 2013. Public comments will be received through those methods explained earlier in this NOI and will be incorporated into a Final Scoping Document. This document will detail the scope of the EIS and the potential environmental effects that will be considered during the study period. After the completion of the Draft EIS, another public comment period will allow for input on the Draft EIS, and these comments will be incorporated into the Final EIS report prior to publication.

Issued on: June 21, 2013.

Reginald B. Lovelace,

Deputy Regional Administrator, FTA Region 3.

[FR Doc. 2013-15411 Filed 6-26-13; 8:45 am]

BILLING CODE P

DEPARTMENT OF TRANSPORTATION

National Highway Traffic Safety Administration

[Docket No. DOT-NHTSA-2013-0028]

Request for Comments on a New Information Collection

ACTION: Notice and request for comments.

SUMMARY: In compliance with the Paperwork Reduction Act of 1995 (44 U.S.C. 3501 *et seq.*), this notice announces that the Information Collection Request (ICR) abstracted below is being forwarded to the Office of Management and Budget (OMB) for review and comments. A **Federal Register** Notice with a 60-day comment period soliciting comments on the

following information collection was published on April 9, 2013 (78 FR 21189).

DATES: Comments must be submitted on or before July 29, 2013.

FOR FURTHER INFORMATION CONTACT: Mr. Patrick Hallan, (202) 366-9146, NHTSA, U.S. Department of Transportation, 1200 New Jersey Avenue SE., Washington, DC 20590.

SUPPLEMENTARY INFORMATION:

Title: 49 CFR 571.116, Motor Vehicle Brake Fluids.

OMB Control Number: 2127-0521.

Type of Request: New Information Collection.

Abstract: Federal Motor Vehicle Safety Standard No. 116, *Motor Vehicle Brake Fluids*, specifies performance and design requirements for motor vehicle brake fluids and hydraulic system mineral oils. Section 5.2.2 of the standard specifies labeling requirements for manufacturers and packagers of brake fluids as well as packagers of hydraulic system mineral oils. The label on a container of motor vehicle brake fluid or hydraulic system mineral oil is permanently attached, clearly states the contents of the container, and includes a DOT symbol indicating that the contents of the container meet the requirements of FMVSS No. 116. The label is necessary to help ensure that these fluids are used for their intended purpose only and the containers are properly disposed of when empty. Improper use, storage, or disposal of these fluids could represent a significant safety hazard for the operators of vehicles or equipment in which they are used and for the environment.

Affected Public: Business or other for profit organizations.

Number of Respondents: 200.

Number of Responses: 70,000,000.

Total Annual Burden Hours: 7,000.

Frequency of Collection: N/A.

ADDRESSES: Send comments regarding the burden estimate, including suggestions for reducing the burden, to the Office of Management and Budget, Attention: Desk Officer for the Office of the Secretary of Transportation, 725 17th Street NW., Washington, DC 20503, Attention NHTSA Desk Officer or to the Docket Management System, Docket Number NHTSA-2013-0028 at <http://www.regulations.gov/>.

Comments are invited on: Whether the proposed collection of information is necessary for the proper performance of the functions of the Department, including whether the information will have practical utility; the accuracy of the Department's estimate of the burden of the proposed information collection; ways to enhance the quality, utility and

RESOLUTION 2011-03

WHEREAS the SEPTA Norristown High-Speed Line Extension is consistent with the core principles of promoting community vitality and economic prosperity included in Upper Merion Township's Mission Statement.

WHEREAS the "Transportation Alternatives" portion of Upper Merion Township's *Vision 2020 Plan* calls on the township to "explore different modes, including new technologies, to focus on moving people and goods rather than just vehicles for optimum transportation effectiveness".

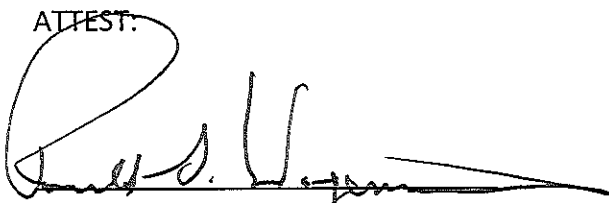
WHEREAS the SEPTA Norristown High-Speed Line Extension will improve the quality of life for residents of Upper Merion Township by reducing traffic congestion and improving access to the King of Prussia Mall, King of Prussia Business Park, Villanova University, Bryn Mawr, Ardmore, and the 69th Street Terminal.

WHEREAS a direct transit connection to the King of Prussia Mall and King of Prussia Business Park will greatly benefit the residents of the Greater Philadelphia region by improving access to employment opportunities and commercial centers, in addition to reducing traffic congestion.

WHEREAS the American Public Transportation Association has documented that for every \$1 invested in public transit, \$4 is generated in economic returns, offering the opportunity for tremendous private sector investment, as well as accompanying economic development and jobs, in the King of Prussia marketplace upon completion of the Norristown High-Speed Line Extension.

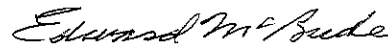
NOW THEREFORE BE IT RESOLVED THAT Upper Merion Township expresses our support for the Norristown High-Speed Line Extension and urges SEPTA to advance this project to implementation.

ATTEST.



RONALD G. WAGENMANN
TOWNSHIP MANAGER/
SECRETARY-TREASURER

UPPER MERION TOWNSHIP
BOARD OF SUPERVISORS



EDWARD MCBRIDE
CHAIRMAN

**MONTGOMERY COUNTY
BOARD OF COMMISSIONERS**

JOSHUA D. SHAPIRO, CHAIR

LESLIE S. RICHARDS, VICE CHAIR

BRUCE L. CASTOR, JR., COMMISSIONER



**MONTGOMERY COUNTY
PLANNING COMMISSION**

MONTGOMERY COUNTY COURTHOUSE • PO Box 311
NORRISTOWN, PA 19404-0311
610-278-3722

FAX: 610-278-3941 • TDD: 610-631-1211
WWW.MONTCOPA.ORG

JODY L. HOLTON, AICP
EXECUTIVE DIRECTOR

August 6, 2013

Mr. Byron Comati, Director
Strategic Planning and Analysis
Finance Division – 9th Floor
1234 Market Street
Philadelphia, PA 19107-3780

Dear Byron:

As part of the formal process for the preparation of the Final Scoping Document to detail the scope of the environmental impact statement for the King of Prussia rail project, the Montgomery County Planning Commission offers the following comments:

1. We support the purpose and need for the proposed project.
2. We support the Tier 1 Alternatives though we suggest that they be modified to eliminate the North Gulph Road corridor portion of each one. There is limited opportunity in the corridor for intensification of transit supportive land uses with the proximity of the I-76 Schuylkill Expressway, the Turnpike interchange and the US-422 Expressway affecting virtually the entire corridor. By eliminating these alignments now, it will simplify the modeling and focus the analysis to alignments north of the mall with the greatest potential to effect changes in King of Prussia.

The County looks forward to working with SEPTA to craft this potentially transformative project.

Sincerely,

Jody L. Holton, AICP
Executive Director

c: Leslie Richards, SEPTA Board Member
Ken Lawrence, SEPTA Board Member



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029**

AUG 14 2013

Mr. Tony Cho
U. S. Department of Transportation
Federal Transit Administration
1760 Market Street
Suite 500
Philadelphia, PA 19103

Re: Environmental Impact Statement Scoping for Increased Transit Service to King Of Prussia, PA

Dear Mr. Cho:

The U.S. Environmental Protection Agency (EPA) has reviewed the materials provided at the July 16, 2013 Agency Scoping Meeting and the additional information on the project website regarding the Environmental Impact Statement (EIS) being prepared for the King of Prussia Rail Project in King of Prussia, PA. As limited information is available, we are able to provide only some general recommendations at this time.

Information regarding the purpose and need, alternatives analyzed, avoidance and minimization of resources, and cumulative effects for the proposed project should be included in the EIS. The EIS should include a clear and robust justification of the underlying purpose and need for the proposed action. The purpose and need statement is important because it helps explain why the proposed action is being undertaken and what objectives the project intends to achieve. The purpose of the proposed action is typically the specific objective of the activity. The need should explain the underlying problem for why the project is necessary. Alternatives analysis should include the suite of other activities or solutions that were considered and the rationale for not carrying these alternatives forward for detailed study.

The document should describe potential impacts to the natural and human environment. Existing resources should be identified and EPA encourages that adverse impacts to natural resources, especially wetlands and other aquatic resources, be avoided and minimized wherever possible. EPA suggests coordinating with other appropriate federal, state and local resource agencies on possible impacts to wetlands, streams, historic and/or rare, threatened and endangered species.

An evaluation of air quality and community impacts, including noise, light and possible traffic impacts, should be included in the document. Potential air impacts and general

conformity should be included in the EIS. The EIS should also include an analysis of any hazardous sites or materials, and the status of any ongoing or past remediation efforts in the project area.

Environmental justice (EJ) should also be evaluated, including the identification of potential communities of concern, and meaningful and timely community involvement, public outreach, and access to information. Consideration should also be given to all potential impacts to at-risk populations, as well as consideration to sensitive subpopulations, possibly including elderly, children and others.

As the project is developed it is hoped that there will be additional information provided with respect to Environmental Justice. There should be a conscientious effort to assure that outreach and communication to populations of Environmental Justice concern are adequate, appropriate, and timely. Comprehensive assessments should be conducted to identify and define areas of potential Environmental Justice concern. A variety of means should be used to assure that at risk communities are appropriately engaged. Assessment should also consider benefits to the community as well as the potential for adverse impacts. Areas of potential adverse impact should be identified and mitigation measures identified as appropriate.

EPA strongly encourages a thorough cumulative impact analysis for past, present and reasonably foreseeable projects occurring in the project areas. The document should address potential indirect and cumulative effects in the project areas, and analysis may aid in the identification of resources that are likely to be adversely affected by multiple projects, and sensitive resources that could require additional measures. It is suggested that a secondary and cumulative effects analysis begin with defining the geographic and temporal limits of the study; this is generally broader than the study area of the project.

Thank you for coordinating with EPA on this project. We look forward to working with you on this project as more information becomes available. If you have any questions and would like to discuss our comments, the staff contact for this project is Ms. Barbara Okorn; she can be reached at 215-814-3330.

Sincerely,



Barbara Rudnick
NEPA Team Leader
Office of Environmental Programs



IN REPLY REFER TO:

United States Department of the Interior

NATIONAL PARK SERVICE
Valley Forge National Historical Park
1400 North Outer Line Drive
King of Prussia, PA 19406-1009

L7621 (VAFO-P)

August 15, 2013

Mr. Sheldon Fialkoff
Project Manager
AECOM
1700 Market Street, Suite 1600
Philadelphia, PA 19103

Dear Mr. Fialkoff:

Thank you for the opportunity to provide comments on the scope of the proposed Environmental Impact Statement and Section 4(f) Evaluation for Increased Transit Service to King of Prussia, Pennsylvania. In preparing these comments, I attended both the Stakeholders' Advisory Committee meeting on June 18 and also the Agency Coordination Committee on July 20 and reviewed the documents you provided.

Draft Purpose and Need Statement, July 2, 2013

Valley Forge NHP receives over 1.4 million visitors per year, with a majority being regional residents. The park is visited both for its historic significance and also for its outstanding open space and recreational values, including serving as a nexus of extensive current and planned bicycle trails. We believe that reliable rail service that reached a point close to the park would be very attractive to the large urban population near the park, including persons who do not own personal vehicles, persons who are daunted by the well known congestion on the highways that surround the park, and bicyclists who would use the train as part of a larger trip. Out-of-town visitors staying in Philadelphia or in the numerous hotels on Route 202 and on North Gulph Road in King of Prussia also would benefit from reliable train service that brought them to the park entrance.

For these reasons, we recommend that to strengthen the case that the Purpose and Need must make that you include the park more prominently in the places where destinations are noted, for example in sections 1.1, 1.2, 1.4.1, 1.4.5, and 1.5.1.

Alternatives

We ask that you consider an additional alternative for a loop that would connect the various branch alternatives now proposed for either North Gulph Road or Maschellmac Creek. Although such a loop will add expense to the project, it would add value to the investment that must be made in the trunk portion of the project and also to the utility of the transit service as a whole.

We ask that as the planning proceeds to the point at which station stops are proposed, that the North Gulph branch alternatives include a station stop near the point where the road passes under

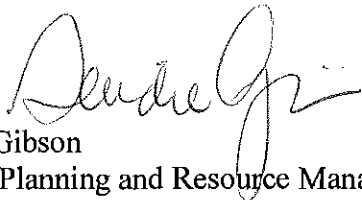
the Route 422 overpass. This is the best point for pedestrians and bicyclists to access the park, and it also would serve the Valley Forge Convention Center and Casino. The park would work with Upper Merion Township on a trail connection.

A station stop on Route 23 would be less useful. Current plans for the reconstruction of the Route 422/23 interchange do not include pedestrian or bicycle access that would allow visitors to safely cross into the park.

Impacts

Given the appropriately conceptual information presented to date, we foresee no adverse impact to park natural or cultural resources. We foresee highly positive impacts for park visitors from the North Gulph alternatives. While bicycling visitors would benefit from the Maschellmac alternatives, we do not believe that these alternatives would serve or benefit pedestrian visitors to the park. We ask that these beneficial impacts be considered in the EIS.

Sincerely,

A handwritten signature in dark ink, appearing to read "Deirdre Gibson", with a stylized flourish at the end.

Deirdre Gibson
Chief of Planning and Resource Management

cc: Mary Morrison, NPS Northeast Regional Office



Pennsylvania Turnpike Commission

America's First Superhighway

www.paturnpike.com

Engineering Department
P. O. Box 67676 • Harrisburg, PA 17106-7676
Phone 717-939-9551 • Fax 717-986-8742
[http: www.paturnpike.com](http://www.paturnpike.com)

August 12, 2013

Mr. Byron S. Cornati
Director of Strategic Planning
Southeastern Pennsylvania Transportation Authority
1234 Market Street, 9th Floor
Philadelphia, PA 17107-3780

Dear Mr. Cornati:

The Pennsylvania Turnpike Commission appreciates the opportunity to comment on your Draft Environmental Impact Study for the Norristown High Speed Line Extension. We have reviewed the materials that you provided and it appears that all alternatives either cross over the Turnpike or run parallel to the Turnpike in Turnpike right-of-way.

We would prefer to avoid permanent facilities to be located in our right-of-way because our constantly increasing needs, such as adding safety features, increasing capacity, improving stormwater management facilities and adding intelligent transportation systems. Perhaps an option that would be acceptable would be to cross the Turnpike next to the Rt. 202 bridge, matching the span of the median pier of the Rt. 202 bridge and having the abutments outside of our right-of-way.

We would be happy to meet with you and your team at any time in the future to discuss your project.

Sincerely,

Bradley J. Heigel, P.E.
Chief Engineer

BJH/mas

cc: Mark P. Compton
Craig R. Shuey
Gary L. Graham
Jeffrey C. Davis
Donald L. Steele

1. PROJECT INFORMATION

Project Name: **King of Prussia Rail - Alternative: PECO-1st Ave.**

Date of Review: **8/10/2017 03:27:14 PM**

Project Category: **Transportation, Railroads (track, bridge, roadway crossing – new, maintenance, removal)**

Project Area: **41.24 acres**

County(s): **Montgomery**

Township/Municipality(s): **BRIDGEPORT; UPPER MERION**

ZIP Code: **19406**

Quadrangle Name(s): **NORRISTOWN; VALLEY FORGE**

Watersheds HUC 8: **Schuylkill**

Watersheds HUC 12: **Mingo Creek-Schuylkill River; Plymouth Creek-Schuylkill River**

Decimal Degrees: **40.084262, -75.384990**

Degrees Minutes Seconds: **40° 5' 3.3426" N, 75° 23' 5.9650" W**

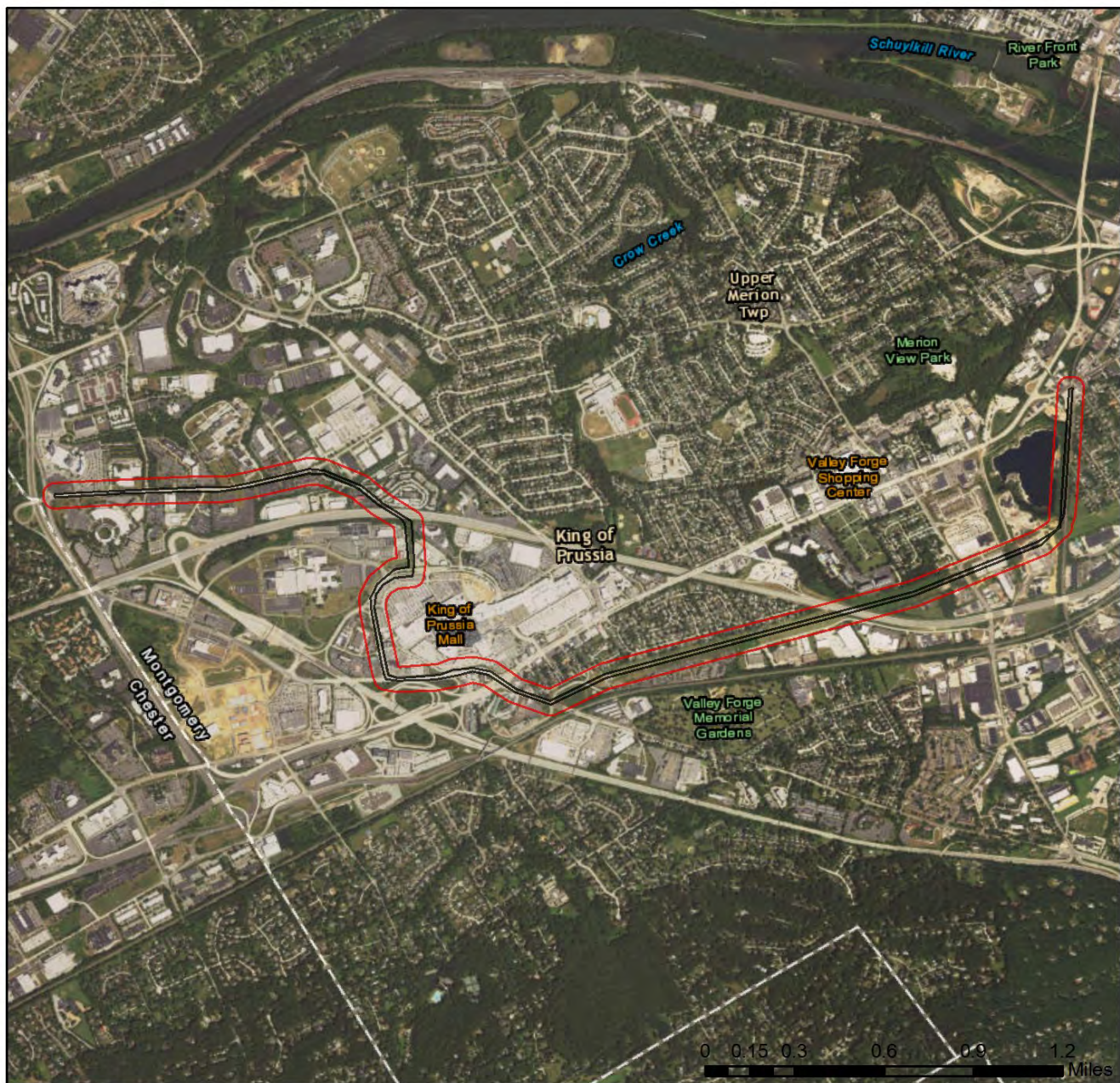
This is a draft receipt for information only. It has not been submitted to jurisdictional agencies for review.

2. SEARCH RESULTS

Agency	Results	Response
PA Game Commission	No Known Impact	No Further Review Required
PA Department of Conservation and Natural Resources	No Known Impact	No Further Review Required
PA Fish and Boat Commission	Potential Impact	FURTHER REVIEW IS REQUIRED, See Agency Response
U.S. Fish and Wildlife Service	No Known Impact	No Further Review Required

As summarized above, Pennsylvania Natural Diversity Inventory (PNDI) records indicate there may be potential impacts to threatened and endangered and/or special concern species and resources within the project area. If the response above indicates "No Further Review Required" no additional communication with the respective agency is required. If the response is "Further Review Required" or "See Agency Response," refer to the appropriate agency comments below. Please see the DEP Information Section of this receipt if a PA Department of Environmental Protection Permit is required.

King of Prussia Rail - Alternative: PECO-1st Ave.

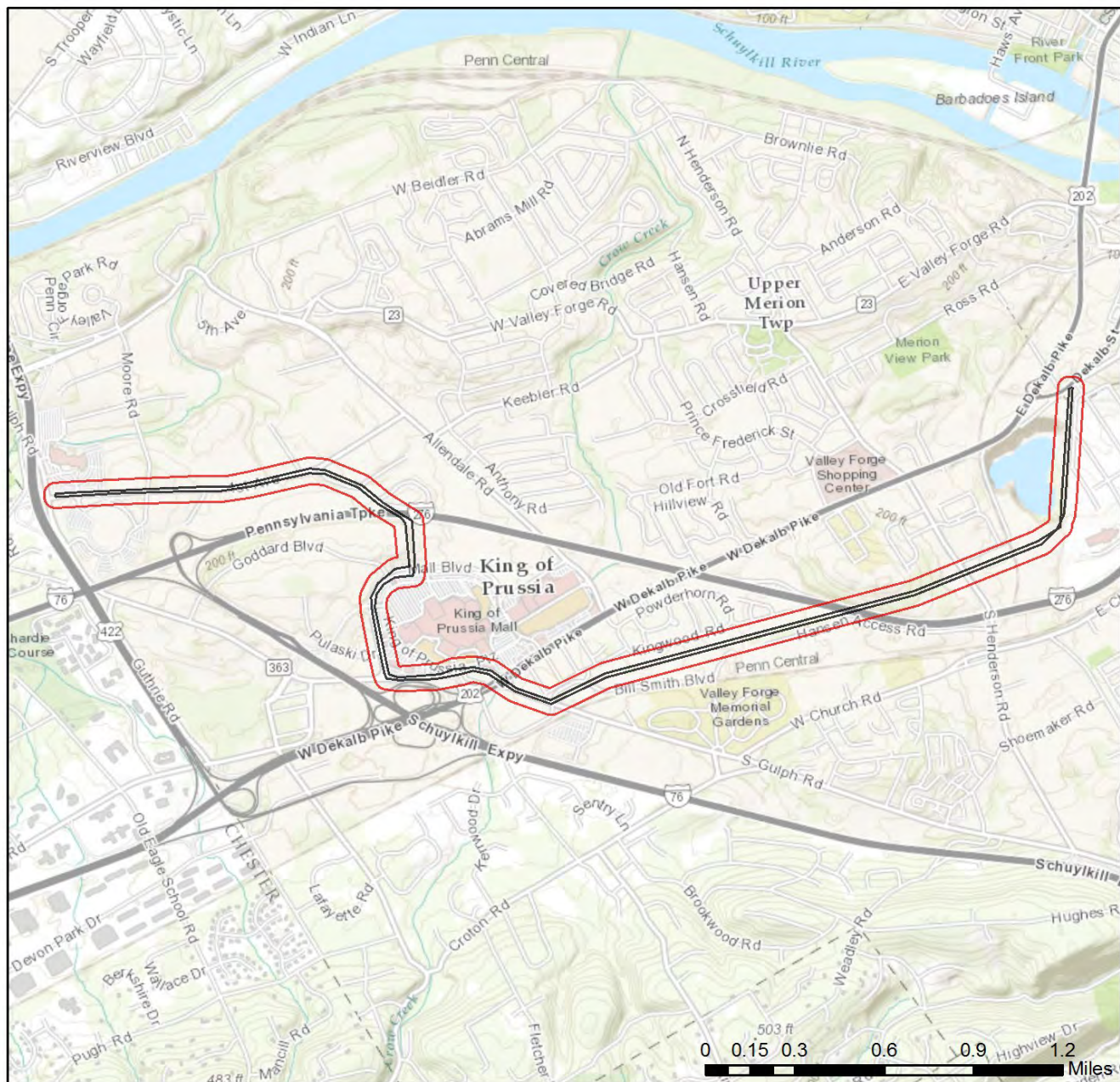


- ☐ Project Boundary
- ☐ Buffered Project Boundary



Service Layer Credits: Sources: Esri, HERE, DeLorme, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), swisstopo, MapmyIndia, © OpenStreetMap contributors, and the GIS User Community
Esri, HERE, DeLorme, MapmyIndia, © OpenStreetMap contributors, and the GIS user

King of Prussia Rail - Alternative: PECO-1st Ave.



- ☐ Project Boundary
- ☐ Buffered Project Boundary

Service Layer Credits: Sources: Esri, HERE, DeLorme, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), swisstopo, MapmyIndia, © OpenStreetMap contributors, and the GIS User Community



RESPONSE TO QUESTION(S) ASKED

Q1: The proposed project is in the range of the Indiana bat. Describe how the project will affect bat habitat (forests, woodlots and trees) and indicate what measures will be taken in consideration of this. Round acreages up to the nearest acre (e.g., 0.2 acres = 1 acre).

Your answer is: The project will affect 1 to 39 acres of forests, woodlots and trees.

Q2: Aquatic habitat (stream, river, lake, pond, etc.) is located on or adjacent to the subject property and project activities (including discharge) may occur within 300 feet of these habitats?

Your answer is: Unknown

Q3: Is tree removal, tree cutting or forest clearing of 40 acres or more necessary to implement all aspects of this project?

Your answer is: No

3. AGENCY COMMENTS

Regardless of whether a DEP permit is necessary for this proposed project, any potential impacts to threatened and endangered species and/or special concern species and resources must be resolved with the appropriate jurisdictional agency. In some cases, a permit or authorization from the jurisdictional agency may be needed if adverse impacts to these species and habitats cannot be avoided.

These agency determinations and responses are **valid for two years** (from the date of the review), and are based on the project information that was provided, including the exact project location; the project type, description, and features; and any responses to questions that were generated during this search. If any of the following change: 1) project location, 2) project size or configuration, 3) project type, or 4) responses to the questions that were asked during the online review, the results of this review are not valid, and the review must be searched again via the PNDI Environmental Review Tool and resubmitted to the jurisdictional agencies. The PNDI tool is a primary screening tool, and a desktop review may reveal more or fewer impacts than what is listed on this PNDI receipt. The jurisdictional agencies **strongly advise against** conducting surveys for the species listed on the receipt prior to consultation with the agencies.

PA Game Commission

RESPONSE:

No Impact is anticipated to threatened and endangered species and/or special concern species and resources.

PA Department of Conservation and Natural Resources

RESPONSE:

No Impact is anticipated to threatened and endangered species and/or special concern species and resources.

PA Fish and Boat Commission

RESPONSE:

Further review of this project is necessary to resolve the potential impact(s). Please send project information to this agency for review (see WHAT TO SEND).

PFBC Species: (Note: The Pennsylvania Conservation Explorer tool is a primary screening tool, and a desktop review may reveal more or fewer species than what is listed below.)

Scientific Name	Common Name	Current Status
Sensitive Species**		Threatened

U.S. Fish and Wildlife Service

RESPONSE:

No impacts to **federally** listed or proposed species are anticipated. Therefore, no further consultation/coordination under the Endangered Species Act (87 Stat. 884, as amended; 16 U.S.C. 1531 et seq. is required. Because no take of federally listed species is anticipated, none is authorized. This response does not reflect potential Fish and Wildlife Service concerns under the Fish and Wildlife Coordination Act or other authorities.

* Special Concern Species or Resource - Plant or animal species classified as rare, tentatively undetermined or candidate as well as other taxa of conservation concern, significant natural communities, special concern populations (plants or animals) and unique geologic features.

** Sensitive Species - Species identified by the jurisdictional agency as collectible, having economic value, or being susceptible to decline as a result of visitation.

WHAT TO SEND TO JURISDICTIONAL AGENCIES

If project information was requested by one or more of the agencies above, upload* or email* the following information to the agency(s). Instructions for uploading project materials can be found [here](#). This option provides the applicant with the convenience of sending project materials to a single location accessible to all three state agencies. Alternatively, applicants may email or mail their project materials (see AGENCY CONTACT INFORMATION).

***Note:** U.S.Fish and Wildlife Service requires applicants to mail project materials to the USFWS PA field office (see AGENCY CONTACT INFORMATION). USFWS will not accept project materials submitted electronically (by upload or email).

Check-list of Minimum Materials to be submitted:

____ Project narrative with a description of the overall project, the work to be performed, current physical characteristics of the site and acreage to be impacted.

____ A map with the project boundary and/or a basic site plan (particularly showing the relationship of the project to the physical features such as wetlands, streams, ponds, rock outcrops, etc.)

In addition to the materials listed above, USFWS REQUIRES the following

____ **SIGNED** copy of a Final Project Environmental Review Receipt

The inclusion of the following information may expedite the review process.

____ Color photos keyed to the basic site plan (i.e. showing on the site plan where and in what direction each photo was taken and the date of the photos)

____ Information about the presence and location of wetlands in the project area, and how this was determined (e.g., by a qualified wetlands biologist), if wetlands are present in the project area, provide project plans showing the location of all project features, as well as wetlands and streams.

4. DEP INFORMATION

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5. ADDITIONAL INFORMATION

The PNDI environmental review website is a preliminary screening tool. There are often delays in updating species status classifications. Because the proposed status represents the best available information regarding the conservation status of the species, state jurisdictional agency staff give the proposed statuses at least the same consideration as the current legal status. If surveys or further information reveal that a threatened and endangered and/or special concern species and resources exist in your project area, contact the appropriate jurisdictional agency/agencies immediately to identify and resolve any impacts.

For a list of species known to occur in the county where your project is located, please see the species lists by county found on the PA Natural Heritage Program (PNHP) home page (www.naturalheritage.state.pa.us). Also note that the PNDI Environmental Review Tool only contains information about species occurrences that have actually been reported to the PNHP.



1. PROJECT INFORMATION

Project Name: **king of Prussia Rail - Alternative: PECO/TP-1st Ave.**

Date of Review: **8/10/2017 03:28:03 PM**

Project Category: **Transportation, Railroads (track, bridge, roadway crossing – new, maintenance, removal)**

Project Area: **41.25 acres**

County(s): **Montgomery**

Township/Municipality(s): **BRIDGEPORT; UPPER MERION**

ZIP Code: **19405; 19406**

Quadrangle Name(s): **NORRISTOWN; VALLEY FORGE**

Watersheds HUC 8: **Schuylkill**

Watersheds HUC 12: **Mingo Creek-Schuylkill River; Plymouth Creek-Schuylkill River**

Decimal Degrees: **40.091116, -75.384305**

Degrees Minutes Seconds: **40° 5' 28.192" N, 75° 23' 3.4974" W**

This is a draft receipt for information only. It has not been submitted to jurisdictional agencies for review.

2. SEARCH RESULTS

Agency	Results	Response
PA Game Commission	No Known Impact	No Further Review Required
PA Department of Conservation and Natural Resources	No Known Impact	No Further Review Required
PA Fish and Boat Commission	Potential Impact	FURTHER REVIEW IS REQUIRED, See Agency Response
U.S. Fish and Wildlife Service	No Known Impact	No Further Review Required

As summarized above, Pennsylvania Natural Diversity Inventory (PNDI) records indicate there may be potential impacts to threatened and endangered and/or special concern species and resources within the project area. If the response above indicates "No Further Review Required" no additional communication with the respective agency is required. If the response is "Further Review Required" or "See Agency Response," refer to the appropriate agency comments below. Please see the DEP Information Section of this receipt if a PA Department of Environmental Protection Permit is required.

king of Prussia Rail - Alternative: PECO/TP-1st Ave.

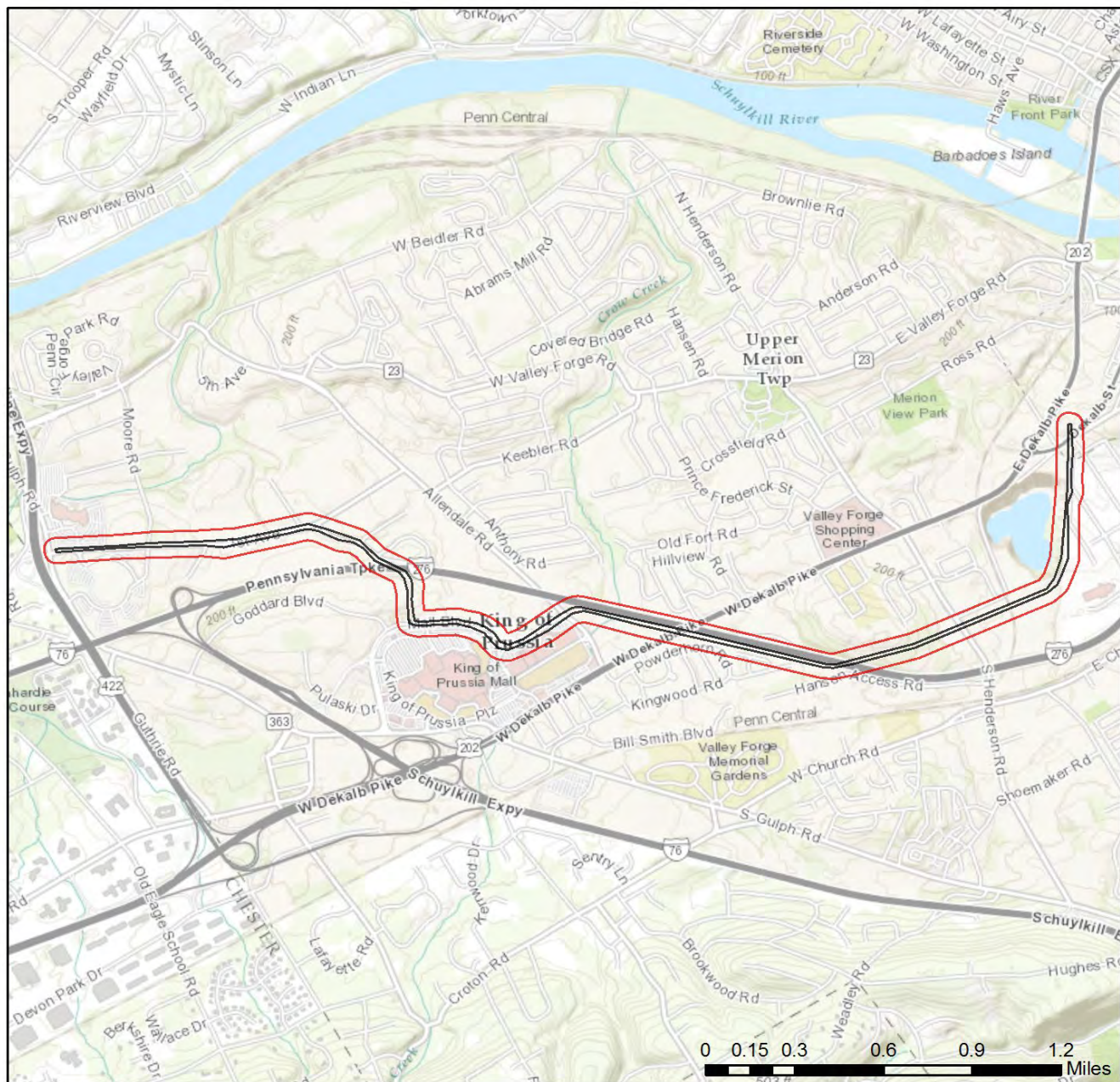


- ☐ Project Boundary
- ☐ Buffered Project Boundary



Service Layer Credits: Sources: Esri, HERE, DeLorme, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), swisstopo, MapmyIndia, © OpenStreetMap contributors, and the GIS User Community

king of Prussia Rail - Alternative: PECO/TP-1st Ave.



- Project Boundary
- Buffered Project Boundary

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RESPONSE TO QUESTION(S) ASKED

Q1: The proposed project is in the range of the Indiana bat. Describe how the project will affect bat habitat (forests, woodlots and trees) and indicate what measures will be taken in consideration of this. Round acreages up to the nearest acre (e.g., 0.2 acres = 1 acre).

Your answer is: The project will affect 1 to 39 acres of forests, woodlots and trees.

Q2: Aquatic habitat (stream, river, lake, pond, etc.) is located on or adjacent to the subject property and project activities (including discharge) may occur within 300 feet of these habitats?

Your answer is: Unknown

Q3: Is tree removal, tree cutting or forest clearing of 40 acres or more necessary to implement all aspects of this project?

Your answer is: No

3. AGENCY COMMENTS

Regardless of whether a DEP permit is necessary for this proposed project, any potential impacts to threatened and endangered species and/or special concern species and resources must be resolved with the appropriate jurisdictional agency. In some cases, a permit or authorization from the jurisdictional agency may be needed if adverse impacts to these species and habitats cannot be avoided.

These agency determinations and responses are **valid for two years** (from the date of the review), and are based on the project information that was provided, including the exact project location; the project type, description, and features; and any responses to questions that were generated during this search. If any of the following change: 1) project location, 2) project size or configuration, 3) project type, or 4) responses to the questions that were asked during the online review, the results of this review are not valid, and the review must be searched again via the PNDI Environmental Review Tool and resubmitted to the jurisdictional agencies. The PNDI tool is a primary screening tool, and a desktop review may reveal more or fewer impacts than what is listed on this PNDI receipt. The jurisdictional agencies **strongly advise against** conducting surveys for the species listed on the receipt prior to consultation with the agencies.

PA Game Commission

RESPONSE:

No Impact is anticipated to threatened and endangered species and/or special concern species and resources.

PA Department of Conservation and Natural Resources

RESPONSE:

No Impact is anticipated to threatened and endangered species and/or special concern species and resources.

PA Fish and Boat Commission

RESPONSE:

Further review of this project is necessary to resolve the potential impact(s). Please send project information to this agency for review (see WHAT TO SEND).

PFBC Species: (Note: The Pennsylvania Conservation Explorer tool is a primary screening tool, and a desktop review may reveal more or fewer species than what is listed below.)

Scientific Name	Common Name	Current Status
Sensitive Species**		Threatened

U.S. Fish and Wildlife Service

RESPONSE:

No impacts to **federally** listed or proposed species are anticipated. Therefore, no further consultation/coordination under the Endangered Species Act (87 Stat. 884, as amended; 16 U.S.C. 1531 et seq. is required. Because no take of federally listed species is anticipated, none is authorized. This response does not reflect potential Fish and Wildlife Service concerns under the Fish and Wildlife Coordination Act or other authorities.

* Special Concern Species or Resource - Plant or animal species classified as rare, tentatively undetermined or candidate as well as other taxa of conservation concern, significant natural communities, special concern populations (plants or animals) and unique geologic features.

** Sensitive Species - Species identified by the jurisdictional agency as collectible, having economic value, or being susceptible to decline as a result of visitation.

WHAT TO SEND TO JURISDICTIONAL AGENCIES

If project information was requested by one or more of the agencies above, upload* or email* the following information to the agency(s). Instructions for uploading project materials can be found [here](#). This option provides the applicant with the convenience of sending project materials to a single location accessible to all three state agencies. Alternatively, applicants may email or mail their project materials (see AGENCY CONTACT INFORMATION).

***Note:** U.S.Fish and Wildlife Service requires applicants to mail project materials to the USFWS PA field office (see AGENCY CONTACT INFORMATION). USFWS will not accept project materials submitted electronically (by upload or email).

Check-list of Minimum Materials to be submitted:

____ Project narrative with a description of the overall project, the work to be performed, current physical characteristics of the site and acreage to be impacted.

____ A map with the project boundary and/or a basic site plan (particularly showing the relationship of the project to the physical features such as wetlands, streams, ponds, rock outcrops, etc.)

In addition to the materials listed above, USFWS REQUIRES the following

____ **SIGNED** copy of a Final Project Environmental Review Receipt

The inclusion of the following information may expedite the review process.

____ Color photos keyed to the basic site plan (i.e. showing on the site plan where and in what direction each photo was taken and the date of the photos)

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1. PROJECT INFORMATION

Project Name: **king of Prussia Rail - Alternative: PECO/TP-N. Gulph**

Date of Review: **8/10/2017 03:29:02 PM**

Project Category: **Transportation, Railroads (track, bridge, roadway crossing – new, maintenance, removal)**

Project Area: **18.83 acres**

County(s): **Montgomery**

Township/Municipality(s): **BRIDGEPORT; UPPER MERION**

ZIP Code: **19405; 19406**

Quadrangle Name(s): **NORRISTOWN; VALLEY FORGE**

Watersheds HUC 8: **Schuylkill**

Watersheds HUC 12: **Mingo Creek-Schuylkill River; Plymouth Creek-Schuylkill River**

Decimal Degrees: **40.091048, -75.384591**

Degrees Minutes Seconds: **40° 5' 27.7730" N, 75° 23' 4.5268" W**

This is a draft receipt for information only. It has not been submitted to jurisdictional agencies for review.

2. SEARCH RESULTS

Agency	Results	Response
PA Game Commission	No Known Impact	No Further Review Required
PA Department of Conservation and Natural Resources	No Known Impact	No Further Review Required
PA Fish and Boat Commission	Potential Impact	FURTHER REVIEW IS REQUIRED, See Agency Response
U.S. Fish and Wildlife Service	No Known Impact	No Further Review Required

As summarized above, Pennsylvania Natural Diversity Inventory (PNDI) records indicate there may be potential impacts to threatened and endangered and/or special concern species and resources within the project area. If the response above indicates "No Further Review Required" no additional communication with the respective agency is required. If the response is "Further Review Required" or "See Agency Response," refer to the appropriate agency comments below. Please see the DEP Information Section of this receipt if a PA Department of Environmental Protection Permit is required.

king of Prussia Rail - Alternative: PECO/TP-N. Gulph



- ☐ Project Boundary
- ☐ Buffered Project Boundary



Service Layer Credits: Sources: Esri, HERE, DeLorme, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), swisstopo, MapmyIndia, © OpenStreetMap contributors, and the GIS User Community
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RESPONSE TO QUESTION(S) ASKED

Q1: The proposed project is in the range of the Indiana bat. Describe how the project will affect bat habitat (forests, woodlots and trees) and indicate what measures will be taken in consideration of this. Round acreages up to the nearest acre (e.g., 0.2 acres = 1 acre).

Your answer is: The project will affect 1 to 39 acres of forests, woodlots and trees.

Q2: Aquatic habitat (stream, river, lake, pond, etc.) is located on or adjacent to the subject property and project activities (including discharge) may occur within 300 feet of these habitats?

Your answer is: Unknown

Q3: Is tree removal, tree cutting or forest clearing of 40 acres or more necessary to implement all aspects of this project?

Your answer is: No

3. AGENCY COMMENTS

Regardless of whether a DEP permit is necessary for this proposed project, any potential impacts to threatened and endangered species and/or special concern species and resources must be resolved with the appropriate jurisdictional agency. In some cases, a permit or authorization from the jurisdictional agency may be needed if adverse impacts to these species and habitats cannot be avoided.

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PA Game Commission

RESPONSE:

No Impact is anticipated to threatened and endangered species and/or special concern species and resources.

PA Department of Conservation and Natural Resources

RESPONSE:

No Impact is anticipated to threatened and endangered species and/or special concern species and resources.

PA Fish and Boat Commission

RESPONSE:

Further review of this project is necessary to resolve the potential impact(s). Please send project information to this agency for review (see WHAT TO SEND).

PFBC Species: (Note: The Pennsylvania Conservation Explorer tool is a primary screening tool, and a desktop review may reveal more or fewer species than what is listed below.)

Scientific Name	Common Name	Current Status
Sensitive Species**		Threatened

U.S. Fish and Wildlife Service

RESPONSE:

No impacts to **federally** listed or proposed species are anticipated. Therefore, no further consultation/coordination under the Endangered Species Act (87 Stat. 884, as amended; 16 U.S.C. 1531 et seq. is required. Because no take of federally listed species is anticipated, none is authorized. This response does not reflect potential Fish and Wildlife Service concerns under the Fish and Wildlife Coordination Act or other authorities.

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1. PROJECT INFORMATION

Project Name: **King of Prussia Rail - Alternative: US 202- 1st Ave.**

Date of Review: **8/10/2017 03:31:02 PM**

Project Category: **Transportation, Railroads (track, bridge, roadway crossing – new, maintenance, removal)**

Project Area: **7.31 acres**

County(s): **Montgomery**

Township/Municipality(s): **BRIDGEPORT; UPPER MERION**

ZIP Code: **19405; 19406**

Quadrangle Name(s): **NORRISTOWN; VALLEY FORGE**

Watersheds HUC 8: **Schuylkill**

Watersheds HUC 12: **Mingo Creek-Schuylkill River; Plymouth Creek-Schuylkill River**

Decimal Degrees: **40.095983, -75.400403**

Degrees Minutes Seconds: **40° 5' 45.5382" N, 75° 24' 1.4515" W**

This is a draft receipt for information only. It has not been submitted to jurisdictional agencies for review.

2. SEARCH RESULTS

Agency	Results	Response
PA Game Commission	No Known Impact	No Further Review Required
PA Department of Conservation and Natural Resources	Potential Impact	FURTHER REVIEW IS REQUIRED, See Agency Response
PA Fish and Boat Commission	Potential Impact	FURTHER REVIEW IS REQUIRED, See Agency Response
U.S. Fish and Wildlife Service	No Known Impact	No Further Review Required

As summarized above, Pennsylvania Natural Diversity Inventory (PNDI) records indicate there may be potential impacts to threatened and endangered and/or special concern species and resources within the project area. If the response above indicates "No Further Review Required" no additional communication with the respective agency is required. If the response is "Further Review Required" or "See Agency Response," refer to the appropriate agency comments below. Please see the DEP Information Section of this receipt if a PA Department of Environmental Protection Permit is required.

King of Prussia Rail - Alternative: US 202- 1st Ave.

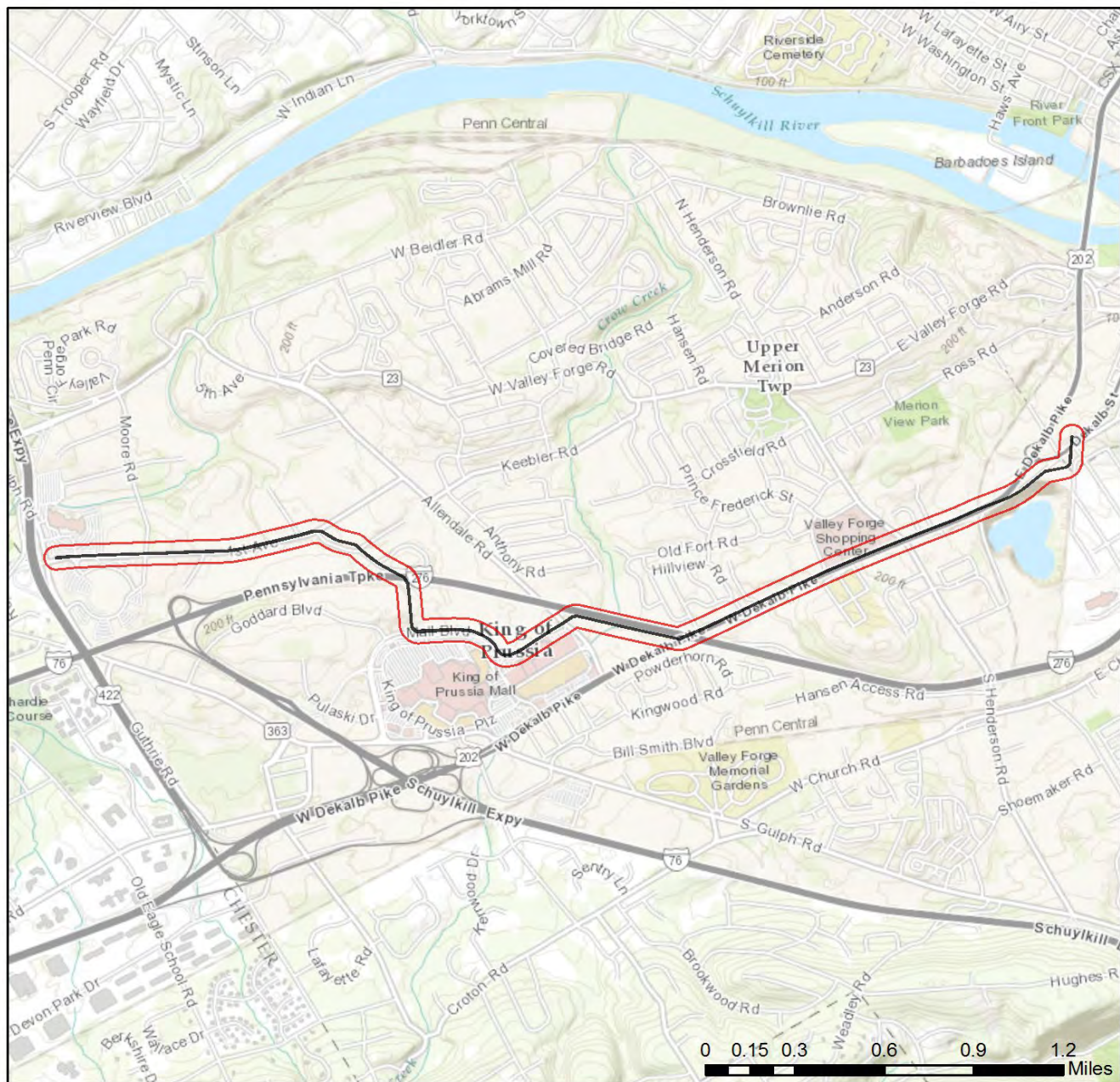


- ☐ Project Boundary
- ☐ Buffered Project Boundary

Service Layer Credits: Sources: Esri, HERE, DeLorme, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), swisstopo, MapmyIndia, © OpenStreetMap contributors, and the GIS User Community



King of Prussia Rail - Alternative: US 202- 1st Ave.



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Service Layer Credits: Sources: Esri, HERE, DeLorme, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), swisstopo, MapmyIndia, © OpenStreetMap contributors, and the GIS User Community



RESPONSE TO QUESTION(S) ASKED

Q1: Will the entire project area (including any discharge), plus a 300 feet buffer around the project area, all occur in or on an existing building, parking lot, driveway, road, road shoulder, street, runway, paved area, railroad bed, maintained (periodically mown) lawn, crop agriculture field or maintained orchard?

Your answer is: No

Q2: The proposed project is in the range of the Indiana bat. Describe how the project will affect bat habitat (forests, woodlots and trees) and indicate what measures will be taken in consideration of this. Round acreages up to the nearest acre (e.g., 0.2 acres = 1 acre).

Your answer is: The project will affect 1 to 39 acres of forests, woodlots and trees.

Q3: Aquatic habitat (stream, river, lake, pond, etc.) is located on or adjacent to the subject property and project activities (including discharge) may occur within 300 feet of these habitats?

Your answer is: Unknown

Q4: Is tree removal, tree cutting or forest clearing of 40 acres or more necessary to implement all aspects of this project?

Your answer is: No

3. AGENCY COMMENTS

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PA Game Commission

RESPONSE:

No Impact is anticipated to threatened and endangered species and/or special concern species and resources.

PA Department of Conservation and Natural Resources

RESPONSE:

Further review of this project is necessary to resolve the potential impact(s). Please send project information to this agency for review (see WHAT TO SEND).

DCNR Species: (Note: The Pennsylvania Conservation Explorer tool is a primary screening tool, and a desktop review may reveal more or fewer species than what is listed below. After desktop review, if a botanical survey is required by DCNR, we recommend the DCNR Botanical Survey Protocols, available here: http://www.gis.dcnr.state.pa.us/hgis-er/PNDI_DCNR.aspx.)

Scientific Name	Common Name	Current Status	Proposed Status	Survey Window
Quercus falcata	Southern Red Oak	Endangered	Endangered	Flowers April - May; leaves distinctive

PA Fish and Boat Commission

RESPONSE:

Further review of this project is necessary to resolve the potential impact(s). Please send project information to this agency for review (see WHAT TO SEND).

PFBC Species: (Note: The Pennsylvania Conservation Explorer tool is a primary screening tool, and a desktop review may reveal more or fewer species than what is listed below.)

Scientific Name	Common Name	Current Status
Sensitive Species**		Threatened

U.S. Fish and Wildlife Service

RESPONSE:

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5. ADDITIONAL INFORMATION

The PNDI environmental review website is a preliminary screening tool. There are often delays in updating species status classifications. Because the proposed status represents the best available information regarding the conservation status of the species, state jurisdictional agency staff give the proposed statuses at least the same consideration as the current legal status. If surveys or further information reveal that a threatened and endangered and/or special concern species and resources exist in your project area, contact the appropriate jurisdictional agency/agencies immediately to identify and resolve any impacts.

For a list of species known to occur in the county where your project is located, please see the species lists by county found on the PA Natural Heritage Program (PNHP) home page (www.naturalheritage.state.pa.us). Also note that the PNDI Environmental Review Tool only contains information about species occurrences that have actually been reported to the PNHP.



1. PROJECT INFORMATION

Project Name: **King of Prussia Rail - Alternative: US 202-N. Gulph**

Date of Review: **8/10/2017 03:30:03 PM**

Project Category: **Transportation, Railroads (track, bridge, roadway crossing – new, maintenance, removal)**

Project Area: **16.05 acres**

County(s): **Montgomery**

Township/Municipality(s): **BRIDGEPORT; UPPER MERION**

ZIP Code: **19405; 19406**

Quadrangle Name(s): **NORRISTOWN; VALLEY FORGE**

Watersheds HUC 8: **Schuylkill**

Watersheds HUC 12: **Mingo Creek-Schuylkill River; Plymouth Creek-Schuylkill River**

Decimal Degrees: **40.090988, -75.384571**

Degrees Minutes Seconds: **40° 5' 27.5572" N, 75° 23' 4.4573" W**

This is a draft receipt for information only. It has not been submitted to jurisdictional agencies for review.

2. SEARCH RESULTS

Agency	Results	Response
PA Game Commission	No Known Impact	No Further Review Required
PA Department of Conservation and Natural Resources	Potential Impact	FURTHER REVIEW IS REQUIRED, See Agency Response
PA Fish and Boat Commission	Potential Impact	FURTHER REVIEW IS REQUIRED, See Agency Response
U.S. Fish and Wildlife Service	No Known Impact	No Further Review Required

As summarized above, Pennsylvania Natural Diversity Inventory (PNDI) records indicate there may be potential impacts to threatened and endangered and/or special concern species and resources within the project area. If the response above indicates "No Further Review Required" no additional communication with the respective agency is required. If the response is "Further Review Required" or "See Agency Response," refer to the appropriate agency comments below. Please see the DEP Information Section of this receipt if a PA Department of Environmental Protection Permit is required.

King of Prussia Rail - Alternative: US 202-N. Gulph



- ☐ Project Boundary
- ☐ Buffered Project Boundary

Service Layer Credits: Sources: Esri, HERE, DeLorme, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), swisstopo, MapmyIndia, © OpenStreetMap contributors, and the GIS User Community



King of Prussia Rail - Alternative: US 202-N. Gulph



- Project Boundary
- Buffered Project Boundary

Service Layer Credits: Sources: Esri, HERE, DeLorme, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), swisstopo, MapmyIndia, © OpenStreetMap contributors, and the GIS User Community



RESPONSE TO QUESTION(S) ASKED

Q1: Will the entire project area (including any discharge), plus a 300 feet buffer around the project area, all occur in or on an existing building, parking lot, driveway, road, road shoulder, street, runway, paved area, railroad bed, maintained (periodically mown) lawn, crop agriculture field or maintained orchard?

Your answer is: No

Q2: The proposed project is in the range of the Indiana bat. Describe how the project will affect bat habitat (forests, woodlots and trees) and indicate what measures will be taken in consideration of this. Round acreages up to the nearest acre (e.g., 0.2 acres = 1 acre).

Your answer is: The project will affect 1 to 39 acres of forests, woodlots and trees.

Q3: Aquatic habitat (stream, river, lake, pond, etc.) is located on or adjacent to the subject property and project activities (including discharge) may occur within 300 feet of these habitats?

Your answer is: Unknown

Q4: Is tree removal, tree cutting or forest clearing of 40 acres or more necessary to implement all aspects of this project?

Your answer is: No

3. AGENCY COMMENTS

Regardless of whether a DEP permit is necessary for this proposed project, any potential impacts to threatened and endangered species and/or special concern species and resources must be resolved with the appropriate jurisdictional agency. In some cases, a permit or authorization from the jurisdictional agency may be needed if adverse impacts to these species and habitats cannot be avoided.

These agency determinations and responses are **valid for two years** (from the date of the review), and are based on the project information that was provided, including the exact project location; the project type, description, and features; and any responses to questions that were generated during this search. If any of the following change: 1) project location, 2) project size or configuration, 3) project type, or 4) responses to the questions that were asked during the online review, the results of this review are not valid, and the review must be searched again via the PNDI Environmental Review Tool and resubmitted to the jurisdictional agencies. The PNDI tool is a primary screening tool, and a desktop review may reveal more or fewer impacts than what is listed on this PNDI receipt. The jurisdictional agencies **strongly advise against** conducting surveys for the species listed on the receipt prior to consultation with the agencies.

PA Game Commission

RESPONSE:

No Impact is anticipated to threatened and endangered species and/or special concern species and resources.

PA Department of Conservation and Natural Resources

RESPONSE:

Further review of this project is necessary to resolve the potential impact(s). Please send project information to this agency for review (see WHAT TO SEND).

DCNR Species: (Note: The Pennsylvania Conservation Explorer tool is a primary screening tool, and a desktop review may reveal more or fewer species than what is listed below. After desktop review, if a botanical survey is required by DCNR, we recommend the DCNR Botanical Survey Protocols, available here: http://www.gis.dcnr.state.pa.us/hgis-er/PNDI_DCNR.aspx.)

Scientific Name	Common Name	Current Status	Proposed Status	Survey Window
Quercus falcata	Southern Red Oak	Endangered	Endangered	Flowers April - May; leaves distinctive

PA Fish and Boat Commission

RESPONSE:

Further review of this project is necessary to resolve the potential impact(s). Please send project information to this agency for review (see WHAT TO SEND).

PFBC Species: (Note: The Pennsylvania Conservation Explorer tool is a primary screening tool, and a desktop review may reveal more or fewer species than what is listed below.)

Scientific Name	Common Name	Current Status
Sensitive Species**		Threatened

U.S. Fish and Wildlife Service

RESPONSE:

No impacts to **federally** listed or proposed species are anticipated. Therefore, no further consultation/coordination under the Endangered Species Act (87 Stat. 884, as amended; 16 U.S.C. 1531 et seq. is required. Because no take of federally listed species is anticipated, none is authorized. This response does not reflect potential Fish and Wildlife Service concerns under the Fish and Wildlife Coordination Act or other authorities.

* Special Concern Species or Resource - Plant or animal species classified as rare, tentatively undetermined or candidate as well as other taxa of conservation concern, significant natural communities, special concern populations (plants or animals) and unique geologic features.

** Sensitive Species - Species identified by the jurisdictional agency as collectible, having economic value, or being susceptible to decline as a result of visitation.

WHAT TO SEND TO JURISDICTIONAL AGENCIES

If project information was requested by one or more of the agencies above, upload* or email* the following information to the agency(s). Instructions for uploading project materials can be found [here](#). This option provides the applicant with the convenience of sending project materials to a single location accessible to all three state agencies. Alternatively, applicants may email or mail their project materials (see AGENCY CONTACT INFORMATION).

***Note:** U.S.Fish and Wildlife Service requires applicants to mail project materials to the USFWS PA field office (see AGENCY CONTACT INFORMATION). USFWS will not accept project materials submitted electronically (by upload or email).

Check-list of Minimum Materials to be submitted:

____ Project narrative with a description of the overall project, the work to be performed, current physical characteristics of the site and acreage to be impacted.

____ A map with the project boundary and/or a basic site plan (particularly showing the relationship of the project to the physical features such as wetlands, streams, ponds, rock outcrops, etc.)

In addition to the materials listed above, USFWS REQUIRES the following

____ **SIGNED** copy of a Final Project Environmental Review Receipt

The inclusion of the following information may expedite the review process.

____ Color photos keyed to the basic site plan (i.e. showing on the site plan where and in what direction each photo was taken and the date of the photos)

____ Information about the presence and location of wetlands in the project area, and how this was determined (e.g., by a qualified wetlands biologist), if wetlands are present in the project area, provide project plans showing the location of all project features, as well as wetlands and streams.

4. DEP INFORMATION

The Pa Department of Environmental Protection (DEP) requires that a signed copy of this receipt, along with any required documentation from jurisdictional agencies concerning resolution of potential impacts, be submitted with applications for permits requiring PNDI review. Two review options are available to permit applicants for handling PNDI coordination in conjunction with DEP's permit review process involving either T&E Species or species of special concern. Under sequential review, the permit applicant performs a PNDI screening and completes all coordination with the appropriate jurisdictional agencies prior to submitting the permit application. The applicant will include with its application, both a PNDI receipt and/or a clearance letter from the jurisdictional agency if the PNDI Receipt shows a Potential Impact to a species or the applicant chooses to obtain letters directly from the jurisdictional agencies. Under concurrent review, DEP, where feasible, will allow technical review of the permit to occur concurrently with the T&E species consultation with the jurisdictional agency. The applicant must still supply a copy of the PNDI Receipt with its permit application. The PNDI Receipt should also be submitted to the appropriate agency according to directions on the PNDI Receipt. The applicant and the jurisdictional agency will work together to resolve the potential impact(s). See the DEP PNDI policy at <https://conservationexplorer.dcnr.pa.gov/content/resources>.



5. ADDITIONAL INFORMATION

The PNDI environmental review website is a preliminary screening tool. There are often delays in updating species status classifications. Because the proposed status represents the best available information regarding the conservation status of the species, state jurisdictional agency staff give the proposed statuses at least the same consideration as the current legal status. If surveys or further information reveal that a threatened and endangered and/or special concern species and resources exist in your project area, contact the appropriate jurisdictional agency/agencies immediately to identify and resolve any impacts.

For a list of species known to occur in the county where your project is located, please see the species lists by county found on the PA Natural Heritage Program (PNHP) home page (www.naturalheritage.state.pa.us). Also note that the PNDI Environmental Review Tool only contains information about species occurrences that have actually been reported to the PNHP.



1. PROJECT INFORMATION

Project Name: **King of Prussia Rail - 69th Street Terminal**
Date of Review: **8/10/2017 03:48:03 PM**
Project Category: **Transportation, Structures and Bridges, Other**
Project Area: **0.41 acres**
County(s): **Delaware**
Township/Municipality(s): **UPPER DARBY**
ZIP Code: **19082**
Quadrangle Name(s): **LANSDOWNE**
Watersheds HUC 8: **Lower Delaware**
Watersheds HUC 12: **Cobbs Creek**
Decimal Degrees: **39.962924, -75.259771**
Degrees Minutes Seconds: **39° 57' 46.5279" N, 75° 15' 35.1745" W**

2. SEARCH RESULTS

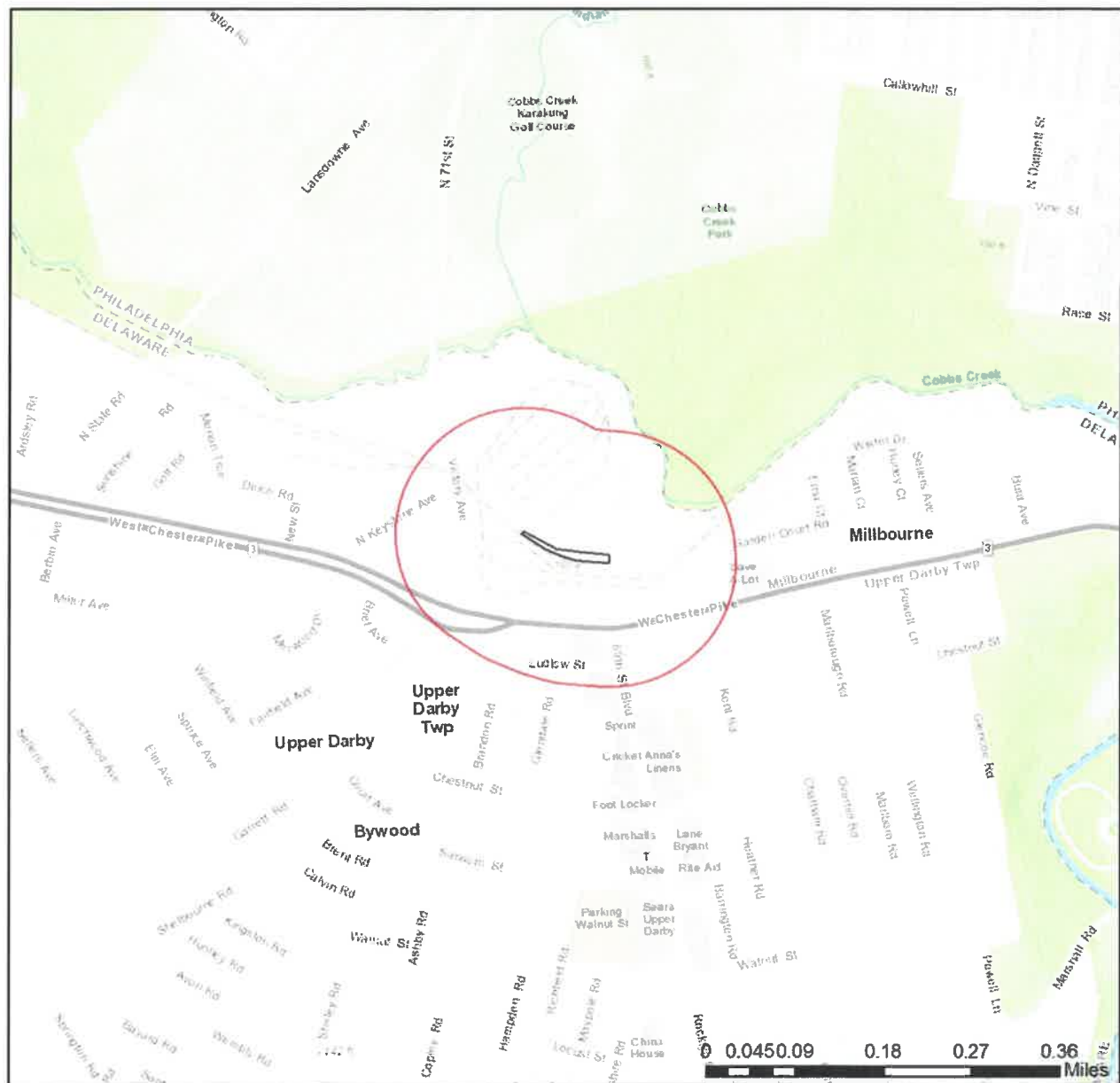
Agency	Results	Response
PA Game Commission	No Known Impact	No Further Review Required
PA Department of Conservation and Natural Resources	No Known Impact	No Further Review Required
PA Fish and Boat Commission	No Known Impact	No Further Review Required
U.S. Fish and Wildlife Service	No Known Impact	No Further Review Required

As summarized above, Pennsylvania Natural Diversity Inventory (PNDI) records indicate no known impacts to threatened and endangered species and/or special concern species and resources within the project area. Therefore, based on the information you provided, no further coordination is required with the jurisdictional agencies. This response does not reflect potential agency concerns regarding impacts to other ecological resources, such as wetlands.

-

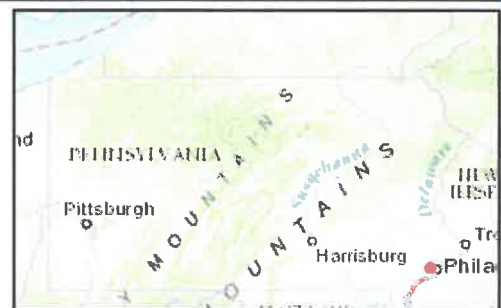
Page 2 of 5

King of Prussia Rail - 69th Street Terminal



- ☐ Project Boundary
- ☐ Buffered Project Boundary

Service Layer Credits: Sources: Esri, HERE, DeLorme, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), swisstopo, MapmyIndia, © OpenStreetMap contributors, and the GIS User Community



3. AGENCY COMMENTS

Regardless of whether a DEP permit is necessary for this proposed project, any potential impacts to threatened and endangered species and/or special concern species and resources must be resolved with the appropriate jurisdictional agency. In some cases, a permit or authorization from the jurisdictional agency may be needed if adverse impacts to these species and habitats cannot be avoided.

These agency determinations and responses are **valid for two years** (from the date of the review), and are based on the project information that was provided, including the exact project location; the project type, description, and features; and any responses to questions that were generated during this search. If any of the following change: 1) project location, 2) project size or configuration, 3) project type, or 4) responses to the questions that were asked during the online review, the results of this review are not valid, and the review must be searched again via the PNDI Environmental Review Tool and resubmitted to the jurisdictional agencies. The PNDI tool is a primary screening tool, and a desktop review may reveal more or fewer impacts than what is listed on this PNDI receipt. The jurisdictional agencies **strongly advise against** conducting surveys for the species listed on the receipt prior to consultation with the agencies.

PA Game Commission

RESPONSE:

No Impact is anticipated to threatened and endangered species and/or special concern species and resources.

PA Department of Conservation and Natural Resources

RESPONSE:

No Impact is anticipated to threatened and endangered species and/or special concern species and resources.

PA Fish and Boat Commission

RESPONSE:

No Impact is anticipated to threatened and endangered species and/or special concern species and resources.

U.S. Fish and Wildlife Service

RESPONSE:

No impacts to **federally** listed or proposed species are anticipated. Therefore, no further consultation/coordination under the Endangered Species Act (87 Stat. 884, as amended; 16 U.S.C. 1531 et seq. is required. Because no take of federally listed species is anticipated, none is authorized. This response does not reflect potential Fish and Wildlife Service concerns under the Fish and Wildlife Coordination Act or other authorities.

4. DEP INFORMATION

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5. ADDITIONAL INFORMATION

The PNDI environmental review website is a preliminary screening tool. There are often delays in updating species status classifications. Because the proposed status represents the best available information regarding the conservation status of the species, state jurisdictional agency staff give the proposed statuses at least the same consideration as the current legal status. If surveys or further information reveal that a threatened and endangered and/or special concern species and resources exist in your project area, contact the appropriate jurisdictional agency/agencies immediately to identify and resolve any impacts.

For a list of species known to occur in the county where your project is located, please see the species lists by county found on the PA Natural Heritage Program (PNHP) home page (www.naturalheritage.state.pa.us). Also note that the PNDI Environmental Review Tool only contains information about species occurrences that have actually been reported to the PNHP.

6. AGENCY CONTACT INFORMATION

PA Department of Conservation and Natural Resources

Bureau of Forestry, Ecological Services Section
400 Market Street, PO Box 8552
Harrisburg, PA 17105-8552
Email: RA-HeritageReview@pa.gov

U.S. Fish and Wildlife Service

Pennsylvania Field Office
Endangered Species Section
110 Radnor Rd; Suite 101
State College, PA 16801
NO Faxes Please

PA Fish and Boat Commission

Division of Environmental Services
595 E. Rolling Ridge Dr., Bellefonte, PA 16823
Email: RA-FBPACENOTIFY@pa.gov

PA Game Commission

Bureau of Wildlife Habitat Management
Division of Environmental Planning and Habitat Protection
2001 Elmerton Avenue, Harrisburg, PA 17110-9797
Email: RA-PGC_PNDI@pa.gov
NO Faxes Please

7. PROJECT CONTACT INFORMATION

Name: John L. Boyce
Company/Business Name: Malcik & Scherer, P.C.
Address: Perryville III Corporate Center, 53 Frontage Road, Suite 260
City, State, Zip: Hampton, NJ 08827
Phone: (908) 537-1326 Fax: (908) 537-1398
Email: Jboyce@malickandscherer.com

8. CERTIFICATION

I certify that ALL of the project information contained in this receipt (including project location, project size/configuration, project type, answers to questions) is true, accurate and complete. In addition, if the project type, location, size or configuration changes, or if the answers to any questions that were asked during this online review change, I agree to re-do the online environmental review.


applicant/project proponent signature

8/16/2017
date

1. PROJECT INFORMATION

Project Name: **King of Prussia Rail Project - Preferred Alternative**

Date of Review: **8/7/2020 10:17:27 AM**

Project Category: **Transportation, Public Transit (subways, busways and Tramways)**

Project Area: **149.67 acres**

County(s): **Montgomery**

Township/Municipality(s): **UPPER MERION**

ZIP Code: **19406**

Quadrangle Name(s): **NORRISTOWN; VALLEY FORGE**

Watersheds HUC 8: **Schuylkill**

Watersheds HUC 12: **Mingo Creek-Schuylkill River; Plymouth Creek-Schuylkill River**

Decimal Degrees: **40.090990, -75.381559**

Degrees Minutes Seconds: **40° 5' 27.5635" N, 75° 22' 53.6108" W**

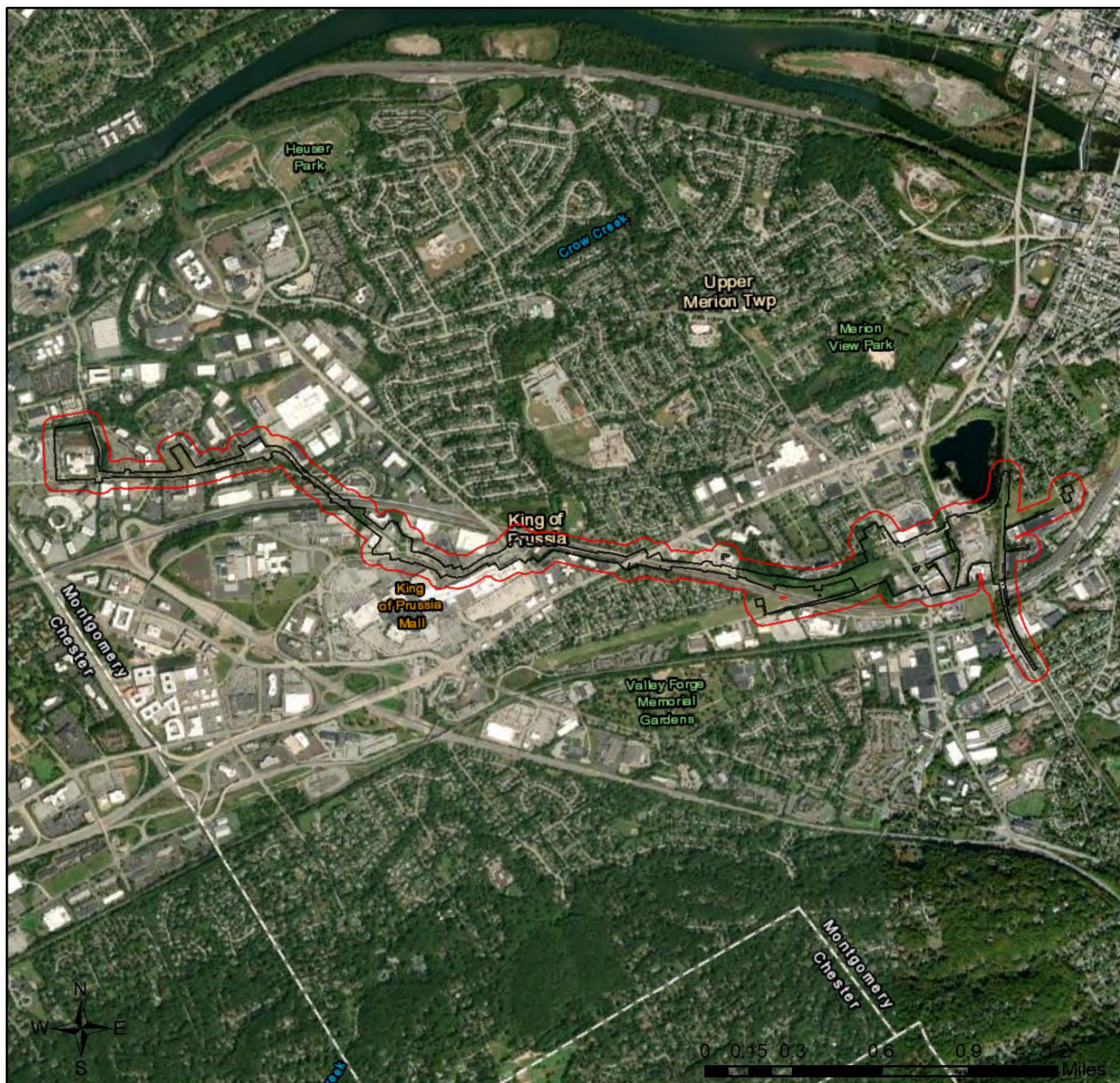
This is a draft receipt for information only. It has not been submitted to jurisdictional agencies for review.

2. SEARCH RESULTS

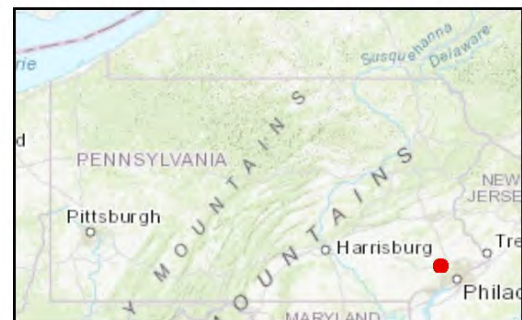
Agency	Results	Response
PA Game Commission	No Known Impact	No Further Review Required
PA Department of Conservation and Natural Resources	No Known Impact	No Further Review Required
PA Fish and Boat Commission	Potential Impact	FURTHER REVIEW IS REQUIRED, See Agency Response
U.S. Fish and Wildlife Service	No Known Impact	No Further Review Required

As summarized above, Pennsylvania Natural Diversity Inventory (PNDI) records indicate there may be potential impacts to threatened and endangered and/or special concern species and resources within the project area. If the response above indicates "No Further Review Required" no additional communication with the respective agency is required. If the response is "Further Review Required" or "See Agency Response," refer to the appropriate agency comments below. Please see the DEP Information Section of this receipt if a PA Department of Environmental Protection Permit is required.

King of Prussia Rail Project - Preferred Alternative



- ☐ Project Boundary
- ☐ Buffered Project Boundary



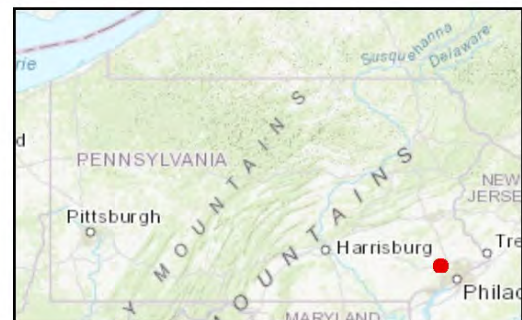
Service Layer Credits: Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community
Esri, HERE, Garmin, (c) OpenStreetMap contributors, and the GIS user community
Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China

King of Prussia Rail Project - Preferred Alternative



- Project Boundary
- Buffered Project Boundary

Service Layer Credits: Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), (c) OpenStreetMap contributors, and the GIS User Community



RESPONSE TO QUESTION(S) ASKED

Q1: The proposed project is in the range of the Indiana bat. Describe how the project will affect bat habitat (forests, woodlots and trees) and indicate what measures will be taken in consideration of this. Round acreages up to the nearest acre (e.g., 0.2 acres = 1 acre).

Your answer is: The project will affect 1 to 39 acres of forests, woodlots and trees.

Q2: Aquatic habitat (stream, river, lake, pond, etc.) is located on or adjacent to the subject property and project activities (including discharge) may occur within 300 feet of these habitats?

Your answer is: Yes

Q3: Is tree removal, tree cutting or forest clearing of 40 acres or more necessary to implement all aspects of this project?

Your answer is: No

3. AGENCY COMMENTS

Regardless of whether a DEP permit is necessary for this proposed project, any potential impacts to threatened and endangered species and/or special concern species and resources must be resolved with the appropriate jurisdictional agency. In some cases, a permit or authorization from the jurisdictional agency may be needed if adverse impacts to these species and habitats cannot be avoided.

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PA Game Commission

RESPONSE:

No Impact is anticipated to threatened and endangered species and/or special concern species and resources.

PA Department of Conservation and Natural Resources

RESPONSE:

No Impact is anticipated to threatened and endangered species and/or special concern species and resources.

PA Fish and Boat Commission

RESPONSE:

Further review of this project is necessary to resolve the potential impact(s). Please send project information to this agency for review (see WHAT TO SEND).

PFBC Species: (Note: The Pennsylvania Conservation Explorer tool is a primary screening tool, and a desktop review may reveal more or fewer species than what is listed below.)

Scientific Name	Common Name	Current Status
Sensitive Species**		Threatened

U.S. Fish and Wildlife Service

RESPONSE:

No impacts to **federally** listed or proposed species are anticipated. Therefore, no further consultation/coordination under the Endangered Species Act (87 Stat. 884, as amended; 16 U.S.C. 1531 et seq. is required. Because no take of federally listed species is anticipated, none is authorized. This response does not reflect potential Fish and Wildlife Service concerns under the Fish and Wildlife Coordination Act or other authorities.

* Special Concern Species or Resource - Plant or animal species classified as rare, tentatively undetermined or candidate as well as other taxa of conservation concern, significant natural communities, special concern populations (plants or animals) and unique geologic features.

** Sensitive Species - Species identified by the jurisdictional agency as collectible, having economic value, or being susceptible to decline as a result of visitation.

WHAT TO SEND TO JURISDICTIONAL AGENCIES

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Check-list of Minimum Materials to be submitted:

____ Project narrative with a description of the overall project, the work to be performed, current physical characteristics of the site and acreage to be impacted.

____ A map with the project boundary and/or a basic site plan (particularly showing the relationship of the project to the physical features such as wetlands, streams, ponds, rock outcrops, etc.)

In addition to the materials listed above, USFWS REQUIRES the following

____ **SIGNED** copy of a Final Project Environmental Review Receipt

The inclusion of the following information may expedite the review process.

____ Color photos keyed to the basic site plan (i.e. showing on the site plan where and in what direction each photo was taken and the date of the photos)

____ Information about the presence and location of wetlands in the project area, and how this was determined (e.g., by a qualified wetlands biologist), if wetlands are present in the project area, provide project plans showing the location of all project features, as well as wetlands and streams.

4. DEP INFORMATION

The Pa Department of Environmental Protection (DEP) requires that a signed copy of this receipt, along with any required documentation from jurisdictional agencies concerning resolution of potential impacts, be submitted with applications for permits requiring PNDI review. Two review options are available to permit applicants for handling PNDI coordination in conjunction with DEP's permit review process involving either T&E Species or species of special concern. Under sequential review, the permit applicant performs a PNDI screening and completes all coordination with the appropriate jurisdictional agencies prior to submitting the permit application. The applicant will include with its application, both a PNDI receipt and/or a clearance letter from the jurisdictional agency if the PNDI Receipt shows a Potential Impact to a species or the applicant chooses to obtain letters directly from the jurisdictional agencies. Under concurrent review, DEP, where feasible, will allow technical review of the permit to occur concurrently with the T&E species consultation with the jurisdictional agency. The applicant must still supply a copy of the PNDI Receipt with its permit application. The PNDI Receipt should also be submitted to the appropriate agency according to directions on the PNDI Receipt. The applicant and the jurisdictional agency will work together to resolve the potential impact(s). See the DEP PNDI policy at <https://conservationexplorer.dcnr.pa.gov/content/resources>.

5. ADDITIONAL INFORMATION

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For a list of species known to occur in the county where your project is located, please see the species lists by county found on the PA Natural Heritage Program (PNHP) home page (www.naturalheritage.state.pa.us). Also note that the PNDI Environmental Review Tool only contains information about species occurrences that have actually been reported to the PNHP.



Environmental Impact Statements; Notice of Availability

A Notice by the [Environmental Protection Agency](#) on 10/17/2017

DOCUMENT DETAILS

Printed version:

PDF (<https://www.gpo.gov/fdsys/pkg/FR-2017-10-17/pdf/2017-22165.pdf>)

Publication Date:

10/17/2017 (/documents/2017/10/17)

Agency:

Environmental Protection Agency (<https://www.federalregister.gov/agencies/environmental-protection-agency>)

Document Type:

Notice

Document Citation:

82 FR 48227

Page:

48227 (1 page)

Agency/Docket Number:

ER-FRL-9035-6

Document Number:

2017-22165

DOCUMENT DETAILS

PUBLISHED DOCUMENT

Responsible Agency: Office of Federal Activities, General Information (202) 564-7146 or
<http://www2.epa.gov/nepa/> (<http://www2.epa.gov/nepa/>).

Weekly receipt of Environmental Impact Statements (EIS)

Filed 10/02/2017 through 10/06/2017

Pursuant to 40 CFR 1506.9 (/select-citation/2017/10/17/40-CFR-1506.9)

Notice

Section 309(a) of the Clean Air Act requires that EPA make public its comments on EISs issued by other Federal agencies. EPA's comment letters on EISs are available at: <https://cdxnodengn.epa.gov/cdx-nepa-public/action/eis/search> (<https://cdxnodengn.epa.gov/cdx-nepa-public/action/eis/search>).

EIS No. 20170198, Final, USAF, MD, Presidential Aircraft Recapitalization Program, Joint Base Andrews-Naval Air Facility, Review Period Ends: 11/15/2017, Contact: Ms Jean Renolds 210-925-4534.

EIS No. 20170200, Draft, FTA, PA, King of Prussia Rail Project, Comment Period Ends: 12/4/2017,
Contact: Daniel Koenig 202-366-8224.

EIS No. 20170201, Draft, USN, CA, Hawaii-Southern Californian Training and Testing, Comment Period
Ends: 12/12/2017, Contact: Nora Macariola-See 808-472-1402.

EIS No. 20170202, Draft, USFS, CO, CP District-wide Salvage, Comment Period Ends: 11/30/2017,
Contact: Mike Tooley 719-274-6321.

Dated: October 9, 2017.

Kelly Knight,

Director, NEPA Compliance Division, Office of Federal Activities.

[FR Doc. 2017-22165 (/a/2017-22165) Filed 10-13-17; 12:00 pm]

BILLING CODE 6560-50-P

PUBLISHED DOCUMENT

Roche, Leslie

Subject: FW: EPA Comments on King of Prussia Rail Project DEIS, Oct. 2017 CEQ No. 20170200
Attachments: KingofPrussiaRailDEIS_EPAComments.pdf

From: Glyn, Rebecca [<mailto:GLYN.REBECCA@EPA.GOV>]
Sent: Monday, November 27, 2017 5:41 PM
To: Smith, Elizabeth A; daniel.koenig@dot.gov
Cc: Rudnick, Barbara; Magerr, Kevin; Forren, John
Subject: EPA Comments on King of Prussia Rail Project DEIS, Oct. 2017 CEQ No. 20170200

Dear Ms. Smith and Mr. Koenig:

The U.S. Environmental Protection Agency, Region 3 (EPA) appreciates the opportunity to review the King of Prussia Rail Project Draft Environmental Impact Statement (DEIS), in accordance with the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act.

EPA has rated the project as Lack of Objections (LO), which indicates our review did not find any potential environmental impacts requiring substantive changes to the preferred alternative. We provide general comments for your consideration in the attached letter and enclosure. In addition, we recommend the following clarifications for the Final EIS.

1. Historic and Archaeological Resources:
The September 26, 2016 PHMC eligibility concurrence memo is located in Appendix C and not Appendix B as stated on page 4-36.
2. Air Quality and Greenhouse Gases:
 - a. On page 4-57, EPA recommends clarifying that Montgomery County is part of the Philadelphia-Wilmington-Atlantic City, PA-NJ-MD-DE marginal nonattainment area for the 2008 ozone NAAQS and part of the Philadelphia-Wilmington, PA-NJ-DE maintenance area for the 2006 PM_{2.5} NAAQS and therefore, recommends editing page 4-57 as follows, to note the requirement to comply with the Transportation Conformity Rule for both O₃ and PM_{2.5}:
"However, because of the County's ~~status~~ designation as marginal nonattainment for the 2008 ozone NAAQS O₃ and maintenance for the 2006 PM_{2.5} NAAQS, ~~TCR compliance is applicable to the Project must~~ comply with air quality conformity requirements for O₃ and PM_{2.5}."
 - b. On pages 4-57 and 4-59, EPA recommends either clarifying that in accordance with 40 CFR 93.123, the Project is not a Project of air quality concern warranting a hot-spot analysis for PM_{2.5} or removing the sentence that references 40 CFR 93.123. 40 CFR 93.123 applies to the hot-spot analysis for PM_{2.5}, which is explained in more detail on page 4-58. EPA suggests minor edits to 4-57 as follows:
"In accordance with 40 CFR 93.123, the Project would use electric-powered vehicles, and as such would not be a project of concern warranting a hot-spot analysis for PM_{2.5} ~~for air quality~~."
EPA suggests editing page 4-59 as follows:
"Therefore, the Project is not a project of air quality concern (POAQC) warranting a hot-spot analysis for PM_{2.5}."

- c. On page 4-60, EPA recommends including the citation 23 CFR 93.126 for the “projects qualifying as categorical exclusions” category of exempt projects or projects with no meaningful potential MSAT impacts.

As noted in our Technical Comments in reference to Section 7.2.2 of the DEIS, EPA would like to continue to participate in the project’s environmental review as a cooperating agency. At your earliest convenience, please let us know your availability to schedule a phone conference to discuss.

Thank you for considering our comments and please contact me with any questions or comments.

Rebecca Souto-Glyn

NEPA Reviewer
U.S. EPA Mid-Atlantic Region 3
Environmental Assessment & Innovation Division
Office of Environmental Programs
1650 Arch Street (3EA30)
Philadelphia, PA 19103
Phone: (215) 814-2795
glyn.rebecca@epa.gov



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029**

November 27, 2017

Ms. Elizabeth Smith, Project Manager
Southeastern Pennsylvania Transportation Authority (SEPTA)
2001 Market Street, 10th Floor (ATTN: ECW)
Philadelphia, PA 19103

Mr. Daniel Koenig, Environmental Protection Specialist
U.S. Federal Transit Administration (FTA), Region III
1760 Market Street, Suite 500
Philadelphia, PA 19103-4124

Re: King of Prussia Rail Project, Draft Environmental Impact Statement (DEIS), Montgomery County, Pennsylvania, October 2017 CEQ No. 20170200

Dear Ms. Smith and Mr. Koenig:

In accordance with the National Environmental Policy Act (NEPA), Section 309 of the Clean Air Act, and the Council on Environmental Quality (CEQ) regulations 40 CFR Parts 1500-1508, the U.S. Environmental Protection Agency (EPA) reviewed the Draft Environmental Impact Statement (DEIS) for the King of Prussia Rail Project located in Montgomery County, Pennsylvania. The DEIS assesses the environmental impacts of five action alternatives, including the recommended Locally Preferred Alternative (LPA) and a no action alternative, to extend the Norristown High Speed Line rail service four miles to the King of Prussia Mall and other destinations in the King of Prussia-Valley Forge area of Upper Merion Township. The proposed action alternatives address the need for faster, more reliable public transit service to, from, and within the King of Prussia-Valley Forge area and include the construction of five to seven new stations and two park-and-ride facilities with multi-modal access to existing bicycle and pedestrian facilities.

EPA has rated the King of Prussia Rail Project DEIS as Lack of Objections (LO). The LO rating means our review did not identify any potential environmental impacts requiring substantive changes to the preferred alternative. A description of our rating system can be found at: <https://www.epa.gov/nepa/environmental-impact-statement-rating-system-criteria>. Some general comments for your consideration on the DEIS are provided in the enclosed Technical Comments.

As noted in our Technical Comments, EPA would like to continue participating in the project's environmental review and provide input at key decision points as a cooperating agency.



Thank you for the opportunity to review this project. If you have questions regarding these comments, the staff contact for this project is Rebecca Souto-Glyn, who can be reached at 215-814-2795 or Glyn.Rebecca@epa.gov.

Sincerely,



Barbara Rudnick
NEPA Review Coordinator
Office of Environmental Programs

Enclosure: Technical Comments on the Draft Environmental Impact Statement, SEPTA King of Prussia Rail Project



*Printed on 100% recycled/recyclable paper with 100% post-consumer fiber and process chlorine free.
Customer Service Hotline: 1-800-438-2474*

Technical Comments on the Draft Environmental Impact Statement SEPTA King of Prussia Rail Project

1. Pedestrian and Bicycle Facilities

On pages ES-13 and 3-20, the DEIS proposes new multi-use paths and shuttle service to connect proposed stations to key destinations, such as King of Prussia Mall, King of Prussia Business Park, Children's Hospital, and Valley Forge National Historic Park (VFNHP). EPA recommends coordinating with local stakeholders to provide direct multi-use paths that connect proposed stations to these key destinations, as well as to the Schuylkill River and Chester Valley Trails, and not rely on shuttle service alone. EPA recommends coordinating locally to provide a direct multi-use path that connects the proposed King of Prussia Casino and Resort station to VFNHP, providing safe crossings of high traffic roadways where necessary. In addition, EPA recommends assessing the feasibility of siting bicycle and car share facilities at proposed stations.

2. Stormwater Management

To address an increase in impervious surface areas from the project, EPA supports the proposal on Chapter 4, page 4-87 to incorporate green infrastructure (rain gardens, riparian stream buffers, vegetative swales, green roofs, and porous pavement) where appropriate into the stormwater management plan. EPA acknowledges the feasibility of installing certain green infrastructure features may be limited by the karst formation underlying portions of the project. Stormwater management facilities should not be placed in wetlands or other aquatic habitats.

3. Hazardous Waste

EPA recommends coordinating with local governments and emergency services to develop a response management plan for potential accidental release of contaminated materials and hazardous waste that may be uncovered or created during construction. Special consideration should be given to areas in close proximity of waterways and other at-risk areas.

Two known sites under cleanup in the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA, aka Superfund) program are identified within or near the proposed alignments, at Henderson Road and 103 Queens Drive. We recommend the Final study include a coordination plan with Pennsylvania Department of Environmental Protection and EPA Region III CERCLA project managers. EPA would be pleased to discuss in more detail.

4. Air Quality and Greenhouse Gases

4.9.1.1 Conformity

Footnote 4 on page 4-56 notes that neither the Transportation Conformity Rule (TCR) nor NEPA regulations require analysis of mobile source air toxics (MSATs). However, EPA recommends conducting an MSAT analysis to capture anticipated changes in emissions within the affected environment of the proposed project.

4.9.3.2 Action Alternatives

It is unclear from the plan documentation if potential short-term impacts from construction-related emissions are captured in the transportation conformity review of the project, in accordance with the EPA general conformity regulations (40 CFR Part 93 Subpart B).





IN REPLY REFER TO:

United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
Custom House, Room 244
200 Chestnut Street
Philadelphia, Pennsylvania 19106-2904

November 30, 2017

9043.1
ER 17/0482

Daniel Koenig
Environmental Protection Specialist, Region III
US Department of Transportation—Federal Transit Administration
1200 New Jersey Avenue, SE
East Building E56-202
Washington, DC 20590

Subject: Draft Environmental Impact Statement and Section 4(f) Evaluation for the King of Prussia Rail Project, Montgomery County, PA.

Dear Mr. Koenig:

The Department of the Interior (Department) has reviewed the Draft Environmental Impact Statement and Draft Section 4(f) Evaluation (DEIS) for the proposed King of Prussia Rail Project in Upper Merion Township, Montgomery County, Pennsylvania. The purpose of the proposed project is to provide faster, more reliable public transit service to the King of Prussia area 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 King of Prussia area; and
- Better serves existing transit riders and accommodates new transit patrons.

The Department offers the following comments on this project for your consideration.

DEIS Comments

The Department understands that the National Park Service (NPS), Valley Forge National Historical Park (Park) has been involved in reviewing the project from the early stages and anticipates no adverse effects to the Park. Although the terminal may be minimally visible from the Park, it is already surrounded by existing mid-rise and high rise office buildings, hotels, and a casino. As described, NPS does not anticipate the project will add cumulative impact to the existing Park viewshed. NPS anticipates that the project may alleviate traffic congestion,

possibly decreasing related impacts to Park resources. Completion of the project, with its terminal near the Park, may increase accessibility by providing another transportation alternative, particularly for visitors or staff without access to personal vehicles.

Section 4(f) Evaluation Comments

The Department has reviewed the draft Section 4(f) Evaluation provided and commends the amount of effort that the Federal Transit Administration and its partners have put into researching potential alternatives and working with other agencies in determining which alternative would least impact 4(f) properties. The Department agrees that the preferred alternative PEPCO/TP-1st Ave. appears to have the least impact on the twelve (12) Section 4(f) properties identified, with only two *de minimis* uses identified for the American Baptist Churches, USA Mission Center and the Philadelphia and Western Railway. The Department recognizes that the Pennsylvania SHPO has concurred with a determination of No Adverse Effect for this alternative. The Department understands that there are potential options and alternatives that may be incorporated into the project that have not yet had formal determinations made, however the Department agrees that the two options under consideration are also likely to have no adverse effect on 4(f) properties. The Department will delay providing formal concurrence until the final Section 4(f) determination is received.

We appreciate the opportunity to provide these comments.

Sincerely,

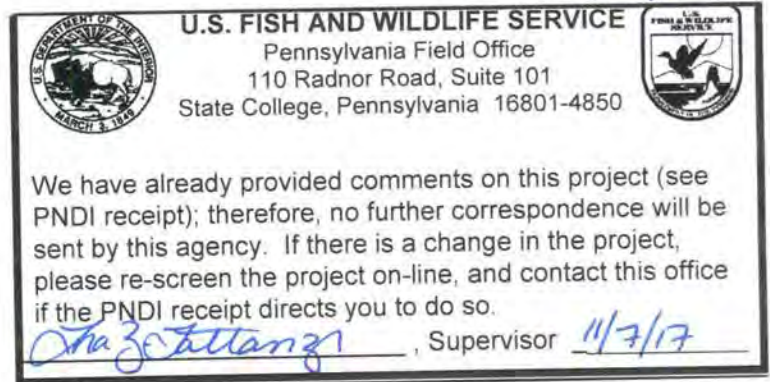
A handwritten signature in black ink, appearing to read 'Lindy Nelson', with a stylized flourish at the end.

Lindy Nelson
Regional Environmental Officer

cc: SHPO-PA James Vaughan (jvaughan@pa.gov)
Daniel Koenig (daniel.koenig@dot.gov)
Project Website (info@koprail.com)

October 13, 2017

Ms. Lora Lattanzi
Supervisor
US Department of the Interior, Fish & Wildlife Service
110 Radnor Road
Suite 101
State College, PA 16801



Re: King of Prussia Rail - Draft Environmental Impact Statement
Upper Merion Township, Montgomery County, PA

Dear Ms. Lattanzi:

The Southeastern Pennsylvania Transportation Authority (SEPTA) is pleased to provide for your review the Executive Summary of the **Draft Environmental Impact Statement (DEIS)** for the King of Prussia Rail (KOP Rail) project in Upper Merion Township, Montgomery County, Pennsylvania. The DEIS is a product of collaboration between SEPTA, the Federal Transit Administration (FTA) as the lead Federal agency, elected officials, state and local agencies, and stakeholders. The DEIS summarizes the transportation and environmental effects of **extending Norristown High Speed Line service to the King of Prussia-Valley Forge area of Upper Merion, a distance of approximately 4.4 miles.** In addition to the printed Executive Summary, this package includes one flash drive that holds the complete DEIS document.

The DEIS includes the purpose and need for the project, alternatives considered, identification of a recommended Locally Preferred Alternative, and transportation and environmental effects for building and operating the KOP Rail project. Information in the DEIS has been presented to the public over the past four years as part of ongoing public outreach efforts for the project.

As part of SEPTA's commitment to public involvement and in accordance with federal requirements including the National Environmental Policy Act, SEPTA has made the DEIS available for public comment through December 4, 2017. The document has been distributed to federal, state, county and local government agencies and interested stakeholders in the project area. The DEIS is available for public review at the libraries listed below and online at www.kingofprussiarail.com.

- Upper Merion Township Library, 175 West Valley Forge Road, King of Prussia
- Montgomery County-Norristown Public Library, 1001 Powell Street, Norristown
- Upper Darby Township Free Public Library, 501 Bywood Avenue, Upper Darby



Pennsylvania Fish & Boat Commission

Division of Environmental Services
Natural Diversity Section
595 E Rolling Ridge Dr.
Bellefonte, PA 16823
814-359-5237

September 28, 2020

IN REPLY REFER TO
SIR# 53503

AECOM
Michael Landis
707 Grant Street
Pittsburgh, Pennsylvania 15219

**RE: Species Impact Review (SIR) – Rare, Candidate, Threatened and Endangered Species
PNDI Search No. 715896_1
King of Prussia Rail Project - Preferred Alternative
MONTGOMERY County: Upper Merion Township**

Dear Michael Landis:

This responds to your inquiry about a Pennsylvania Natural Diversity Inventory (PNDI) Internet Database search “potential conflict” or a threatened and endangered species impact review. These projects are screened for potential conflicts with rare, candidate, threatened or endangered species under Pennsylvania Fish & Boat Commission jurisdiction (fish, reptiles, amphibians, aquatic invertebrates only) using the Pennsylvania Natural Diversity Inventory (PNDI) database and our own files. These species of special concern are listed under the Endangered Species Act of 1973, the Wild Resource Conservation Act, and the Pennsylvania Fish & Boat Code (Chapter 75), or the Wildlife Code.

Northern Red-bellied Cooter (*Pseudemys rubriventris*, Threatened)

The Northern Red-bellied Cooter is one of Pennsylvania’s largest native aquatic turtles. This turtle species is known to inhabit relatively large, deep streams, rivers, ponds, lakes, and marshes with permanent water and ample basking sites. Red-bellied Cooters are restricted to the southcentral and southeastern regions of the Commonwealth. The existence of this turtle species is threatened by habitat destruction, poor water quality and competition with aggressive non-native turtle species that share its range and habitat (e.g. Red-eared Slider).

If open slack water areas of streams, lakes, or ponds or the area within 300ft of these water features are to be disturbed from the project activity, we will need to conduct a more thorough evaluation of the potential adverse impacts to the species of concern. Items **such as:** basic project plans, project narrative, general habitat descriptions, and color photographs keyed to a site map or diagram of the project area, wetlands identification and delineation, stream characterization (flow velocity, width, depth, substrate type, pools and riffles, identification of basking areas, logs, woody debris, presence of aquatic vegetation) would expedite our review process. Pending the review of information, a habitat

Our Mission:

www.fish.state.pa.us

To protect, conserve and enhance the Commonwealth’s aquatic resources and provide fishing and boating opportunities.

assessment or survey targeting the presence of the species of concern may be warranted.

However, if open slack water areas of streams, lakes, or ponds or the area within 300ft of these water features are not to be disturbed in any way by the proposed activity, and provided that best management practices are employed and strict erosion and sedimentation measures are maintained, I do not foresee any adverse impacts to the Northern Red-bellied Cooter (*Pseudemys rubriventris*) from the proposed project.

This response represents the most up-to-date summary of the PNDI data and our files and is valid for two (2) years from the date of this letter. An absence of recorded species information does not necessarily imply species absence. Our data files and the PNDI system are continuously being updated with species occurrence information. Should project plans change or additional information on listed or proposed species become available, this determination may be reconsidered, and consultation shall be re-initiated.

If you have any questions regarding this review, please contact Kathy Gipe at 814-359-5186 and refer to the SIR # 53503. Thank you for your cooperation and attention to this important matter of species conservation and habitat protection.

Sincerely,

A handwritten signature in black ink that reads "Christopher A. Urban". The signature is fluid and cursive, with the first name being the most prominent.

Christopher A. Urban, Chief
Natural Diversity Section

CAU/KDG/dn

5. Environmental Justice

- a. EPA recommends strengthening the Environmental Justice assessment by adding a column on Table 4-14.1 with the combined percentages of Minority – non Hispanic and Minority – Hispanic populations, to give the perspective of the total minority population. Please note the Federal definition of a minority population.
- b. Further analysis may be needed to determine the potential for localized project-related adverse impacts or benefits to minority and/or low income populations. It is not reasonable to assume that all adverse impacts or benefits will be shared by all.

6. Historic and Archaeological Resources

- a. As the DEIS Section 106 consultation is on the recommended LPA (page 4-32), please describe how additional Section 106 consultation will proceed if the LPA is not the preferred alternative in the Final EIS.
- b. EPA recommends quantifying potential impacts to “a similar sliver of land from the historic property alongside the edge of 1st Avenue” (page 4-43) for the PECO-1st Ave. and US 202-1st Ave. Action Alternatives and recommended LPA design options, as well as those discussed on pages 4-41 to 4-44, Recommended LPA. Presenting these impacts in a format similar to Table 5-3-2 would be useful.
- c. EPA recommends quantifying the number of residences with potential visual and aesthetic impacts from the Action Alternatives and Recommended LPA, as described in Section 4.8 (for VAU 1, VAU 3, VAU 5, VAU 6, and VAU 7).
- d. EPA recommends quantifying the number of residences with significant visual impact (as shown in Figure 4-8.10) and potential mitigation measures.
- e. Figure 4-8.11 shows less significant visual impact, though this depiction could be more realistic if rendered after leaves have fallen from deciduous trees.
- f. It would be helpful to include the 2016 *KOP Rail Intensive-Level Survey and Eligibility Report* and 2017 *KOP Rail Determination of Effects Report*, referenced on page 5-5, in the Appendices for review.
- g. Please explain what is meant by 24 partial and 4 full residential acquisitions under “Impact Magnitude” in Table 5-5.1, under PECO/TP-1st Ave.

7. General Comments

- a. EPA recommends during location selection and design of the alignment and ancillary facilities (including stations, pedestrian and bicycle, stormwater management, etc.) continued investigation of ways to avoid or minimize impacts to the natural and built environment, such as to wetlands and other aquatic resources, historic, cultural, and archaeological resources, and potential noise and visual impacts of the proposed project.
- b. EPA suggests the Final EIS provide additional information on potential relocation sites for the King of Prussia Volunteer Fire Company under the 9/11 Memorial Avoidance Option for the recommended LPA.
- c. Per DEIS Section 7.2.2, EPA affirms our interest in continuing to participate in the project’s environmental review and provide input at key decision points as a cooperating agency.





Pennsylvania
Historical & Museum
Commission

PROJECT REVIEW FORM

Request to Initiate SHPO Consultation on State and Federal Undertakings

SHPO USE ONLY

Reviewers: _____/_____

DATE RECEIVED:

DATE DUE:

ER NUMBER:

HRSF: ☐

REV: 07/2020

SECTION A: PROJECT NAME & LOCATION

Is this a new submittal? ☐ YES ☐ NO OR ☒ This is additional information for ER Number: 2013-1006-091

Project Name King of Prussia Rail Extension County Montgomery Municipality Upper Merion
Project Address Between NHSL and Upper Gulph Rd./1st Ave. City/State/ Zip King of Prussia PA 19406

SECTION B: CONTACT INFORMATION & MAILING ADDRESS

Name Shauna Haas and Tim Lidiak Phone (215) 656-7053
Company Federal Transit Administration Fax
Street/PO Box 1835 Market Street, Suite 1910 Email shauna.haas@dot.gov
City/State/Zip Philadelphia PA 19103 Email cc: tim.lidiak@dot.gov

SECTION C: PROJECT DESCRIPTION

This project is located on: ☐ Federal property ☒ State property ☐ Municipal property ☒ Private property
(check all that apply)

List all federal and state agencies and programs providing funds, permits, licenses.	Agency Type	Agency/Program/Permit Name	Project/Permit/Tracking Number (if applicable)
	Federal	Federal Transit Administration	

Proposed Work – Attach project description, scope of work, site plans, and/or drawings

Project includes (check all that apply): ☒ Construction ☒ Demolition ☐ Rehabilitation ☐ Disposition

Total acres of project area: 485 Total acres of earth disturbance: 92

Are there any buildings or structures within the project area? ☐ Yes ☐ No Approximate age of buildings: 50-100 years

Does this project involve properties listed in or eligible for the National Register of Historic Places, or locally designated? Inventory here: <https://gis.penndot.gov/crgis> Yes ☐ No ☐ Unsure ☐ Name multiple
Key Number

**Please email this form
and pdf attachments to:
RA-PH-PASHPO-ER@pa.gov**

Please be sure to save the Project Review Form so that it remains a digital document and retains its function as a fillable pdf. Do not print the form and scan as a pdf.

Attachments – Please include the following information with this form

- ☒ Map – 7.5' USGS quad, streetmap, or parcel map showing the project's Area of Potential Effect
- ☒ Description/Scope of Work – Narrative description of the project, including any ground disturbance and previous land use, and any potential to impact historic resources
- ☒ Site Plans/Drawings – Indicate location and age of buildings, any proposed improvements, and past and present land use
- ☒ Photographs – Digital photographs of all buildings and structures keyed to a site plan. If demolition or exterior changes are proposed to buildings more than 50 years old, please also include Abbreviated HRSF

SHPO RESPONSE (SHPO USE ONLY)

- ☐ There are NO HISTORIC PROPERTIES in the Area of Potential Effect ☐ SHPO REQUESTS ADDITIONAL INFORMATION (see attached)
- ☐ The project will have NO EFFECT on historic properties
- ☐ The project will have NO ADVERSE EFFECTS on historic properties: _____ Key# _____

DIVISION CHIEF, ENVIRONMENTAL REVIEW:

DATE: _____

SHPO REVIEWER: _____



U.S. Department
of Transportation
**Federal Transit
Administration**

REGION III
Delaware, District of
Columbia, Maryland,
Pennsylvania, Virginia,
West Virginia

1835 Market St
Suite 1910
Philadelphia, PA 19103-2968
215-656-7100

October 19, 2020

Mr. Douglas McLearen
Division Chief, Environmental Review
Pennsylvania Historical & Museum Commission
State Historic Preservation Office
400 North Street, 2nd Floor
Harrisburg, PA 17120-0093

RE: Section 106 Consultation for the King of Prussia (KOP) Rail Project, Upper Merion Township, Montgomery County, Pennsylvania (ER 2013-1006-091-A)

Dear Mr. McLearen:

The Federal Transit Administration (FTA), in cooperation with the Southeastern Pennsylvania Transportation Authority (SEPTA), previously completed Section 106 consultation for the above-referenced Project on March 16, 2017, with the Pennsylvania State Historic Preservation Office (PA SHPO) concurring with FTA's finding of no adverse effect.

The purpose of this letter is to reopen Section 106 consultation for the Project because of design refinements that change the limits of disturbance and the Area of Potential Effects (APE) of the Project. FTA is presenting for SHPO consideration and concurrence the modified APEs for architecture and archaeology, assessment of historic properties not previously documented within this modified APE, and an evaluation of effects based on the design refinements and newly identified historic resources.

Modified APE for Historic Architecture

The modified APE for architecture, depicted in Attachment A, Figures 1 and 2, includes the following additional areas, all in Upper Merion Township:

- Norristown High Speed Line (NHSL) - The APE boundary is moved from the centerline of the NHSL to the eastern edge of the Project limits of disturbance along the NHSL to accommodate widening of the existing rail embankment where the Project joins the NHSL; the embankment will be widened to accommodate the Project track interconnection with the existing NHSL tracks. Work will occur entirely within the right-of-way (ROW) of the NHSL.
- Between Henderson Road and the NHSL - The APE boundary is expanded to the south to accommodate the following refined Project elements:
 - A proposed drainage easement along the west side of the NHSL;
 - Full parcel acquisition of the Republic Services property (owned by Browning-Ferris Industries);
 - A driveway easement between Henderson Road and a proposed stormwater management basin; and

- A sliver of land that SEPTA will purchase adjacent to the southern edge of the PECO Energy Company (PECO) corridor to offset right-of-way needs from the north edge of the PECO corridor.
- Henderson Road Area - The APE boundary is expanded to the north to accommodate a parking structure for Henderson Road Station and temporary construction easement along Henderson Road.
- Mall Boulevard Area - The APE boundary is expanded north of existing Mall Boulevard to accommodate the refined location of Mall Blvd Station in the vicinity of the Hyatt House Hotel.
- First Avenue Area - The APE boundary is expanded on the north side of First Avenue in Moore Park (formerly KOP Business Park) to accommodate the following elements:
 - A proposed stormwater management basin on a portion of the existing Arkema property; and
 - Full parcel acquisition of the Devon International Group property (owned by Royale Garden) on the west side of Moore Road to accommodate the refined location of First & Moore Station.

The modified APE was determined based on the refined design alternatives, desktop analysis, and field survey. The APE was expanded to include land acquisitions for construction, stormwater drainage, and other easements immediately west of the NHSL and south of the proposed rail extension, and for parking structures at the Henderson Road Station and First & Moore Station, including parcels or portions of land parcels that extend beyond the original APE (see Attachment A, Figures 1 and 2). The Republic Services property, located in a low-lying area between Saulin Blvd. and the PA Turnpike, is surrounded by the NHSL, the elevated PA Turnpike, and modern development on Saulin Blvd., and as such, work at this location would not have visual impacts to surrounding properties. Proposed driveway easements nearby are through already-modernized areas and mostly utilize existing driveways or parking areas. Field survey of the viewsheds in the proposed Henderson Road station parking area indicated that the parcels to be acquired are surrounded by wooded buffers, and that due to distance, vegetation, and topography, the proposed multistory parking structures would not have visual impacts to adjacent properties. At the First & Moore station, where the Devon International Group parcel would be cleared for a parking structure, the parcel is surrounded by modern office parks, a wooded stream valley, and the modern Valley Forge Casino complex. Again, there would not be visual impacts to surrounding properties. As such, the modified APE was limited to the parcel boundaries for all of these acquisitions.

The design refinements also call for replacement of several high-voltage transmission towers in the PECO corridor with taller monopole structures near the east end of the APE, which has the potential to be visible from nearby properties. The previous study called for potential replacements of some towers, and a visual analysis was undertaken at that time as part of determining the APE. As the current design refinements provide further identification of which towers would be affected, a reassessment of the potential for visual effects to historic resources from the proposed monopoles was undertaken. An APE for visual impacts was defined based on the proposed height of the monopoles, the surrounding terrain, vegetation, and existing land uses (see Attachment A, Figure 2).

The portion of the APE for historic architecture in the vicinity of the affected PECO transmission towers is characterized by terrain that slopes down from higher elevations to a low point in the vicinity of the NHSL and Saulin Boulevard. Land uses surrounding the PECO corridor between the NHSL and the PA Turnpike are primarily modern residential, commercial, and industrial uses. Tree and shrub vegetation at the edges of properties in the vicinity of the PECO corridor is consistently tall and thick. These existing characteristics, along with topography and existing built resources, constrain views of the PECO corridor from the north, east, and west such that the replacement towers will either not be visible or would be in the background and not focal points of views that affect the setting of potential historic resources. Much of the visible horizon surrounding the east end of the corridor is already cluttered by existing transmission and cellular towers, as well as elevated water tanks. From the south, the proposed towers will be visible for a longer distance because the land slopes downward in that direction. However, the PA Turnpike is elevated across that viewshed and will mostly obstruct views from the south.

Eligibility for Historic Architecture

PNJ Interconnection; Conowingo to Plymouth Meeting Transmission Line

One new potential historic resource has been identified within the modified APE: the PECO transmission line corridor is a portion of the Pennsylvania-New Jersey (PNJ) Interconnection; Conowingo to Plymouth Meeting Transmission Line (Key No. 156601; PNJ Interconnection). The resource is a linear transmission line lying between the existing NHSL and the PA Turnpike, extending across the Turnpike along Hansen Access Road. This resource was part of the original APE for the Project, but was not identified as a potential historic resource during previous consultation, as it was thought to postdate 1975; however, new information indicates that it is more than 50 years old. The portion of the PNJ Interconnection in the APE is depicted on Figures 1a and 1b in Attachment A. This portion of the PNJ Interconnection has been evaluated and documented in the Historic Resources Survey Form (HRSF) attached, which includes a detailed site plan and keyed photographs (Attachment B).

The portion of the PNJ Interconnection lying within the modified APE is eligible for listing in the National Register of Historic Places (NRHP) as a contributing portion of the larger PNJ Interconnection, a 210-mile ring of high-voltage transmission lines constructed in the 1920s to service PA and NJ (Attachment A, Figures 1a and 1b and 3; Attachment B).

Assessment of Effects for Historic Architecture

Previously Evaluated Resources

The 2016 *Determination of Effects Memorandum* concluded that the Project would have **no adverse effect** on three properties: Pennsylvania Turnpike: Delaware River Extension (Key No. 155679), Philadelphia and Western Railway (NHSL) (Key No. 128825), and American Baptist Churches USA Mission Center (Key No. 203535). The 2016 *Determination of Effects Memorandum* also concluded that the Project would result in a finding of **no historic properties affected** on the Market Street Elevated Railway Historic District (Key No. 105499) and 69th Street Terminal Square Shopping District (Key No. 156448). The SHPO concurred with this finding on March 16, 2017.

The Definition of Effect/Criteria of Adverse Effect were applied to the same properties in light of the recent design refinements and proposed replacement of existing transmission towers, as all five properties remain within the modified APE (see Attachment C, Table 1). For the first two properties, the findings reported in the 2016 *Determination of Effects Memorandum* continue to apply because the Project would not alter, directly or indirectly, any of the characteristics of the

property that qualify the property for inclusion in the NRHP in a manner that would diminish the integrity of the property. For these reasons, FTA finds no change to the **no adverse effect** determinations for these resources:

- Pennsylvania Turnpike: Delaware River Extension (Key No. 155679) – The Project will run along the north side of the resource for approximately 2,600 feet before crossing the resource where the existing DeKalb Pike crosses the resource. See Tables 2 and 3 in Attachment C.
- Philadelphia and Western Railway (NHSL) (Key No. 128825) – The design refinement expanded the limit of disturbance of the Project to widen the existing NHSL embankment to accommodate the Project track interconnection with the existing NHSL tracks. See Tables 4 and 5 in Attachment C.

For the American Baptist Churches USA Mission Center, the no adverse effect finding formerly determined for the property stemmed from the need to take some land due to the location of the westernmost components of the Project. Under the refined design, no land takes would be necessary, due to shifting the Project further to the north and outside the property boundary. For this reason, FTA finds the project will result in **no historic properties affected** for this property.

- American Baptist Churches USA Mission Center (Key No. 203535) – The design refinement shifted the Project to the north side of First Avenue. The Project will no longer require land from the resource. See Table 6 in Attachment C.

For the last two resources, the design refinements at the 69th Street Transportation Center would occur in and adjacent to a modern extension of the Transportation Center building, and would not be visible from these two adjacent historic districts. No work would occur within the NRHP boundary of the historic districts. For each resource, the findings reported in the 2016 *Determination of Effects Memorandum* continue to apply because the Project would not alter the characteristics of the historic property qualifying it for inclusion in or eligibility for the NRHP. For these reasons, FTA finds no change to the determination of **no historic properties affected** for these resources:

- Market Street Elevated Railway Historic District (Key No. 105499) (Table 7 in Attachment C).
- 69th Street Terminal Square Shopping District (Key No. 156448) (Table 8 in Attachment C).

Newly Identified Resources

As discussed above, one new historic resource was identified in the modified APE: the PNJ Interconnection. The portion of the PNJ Interconnection in the APE has seven pairs of steel lattice towers (approximately 65 to 85 feet tall) that carry the electric conductor cables (circuits) along the PECO transmission corridor. As previously mentioned, conceptual engineering study identified the need to replace at least four of the towers at the eastern end of the resource to address potentially insufficient vertical clearance between the proposed track and the electric circuits. The extant 14 towers are shown on Figures 1a and 1b in Attachment A; the four towers coded in red in Figure 1a will be replaced, while the three towers coded in yellow in Figure 1a may also require replacement, depending on further study during subsequent Project design. SEPTA determined that adequate vertical clearance cannot be achieved by changing the elevation of the track. This is because the elevation of the proposed tracks is constrained by vertical clearance requirements over Henderson Road. It is not feasible to lower the track elevation within the transmission line corridor, and then increase the track grade to achieve vertical clearance requirements over Henderson Road.

The only feasible way to increase vertical clearance is to raise the existing electric transmission circuits. In the existing condition, the electric circuits are attached to the top horizontal arms of the existing towers; thus, the circuits cannot be raised higher on the existing towers. The towers will need to be replaced with taller towers in order to raise the electric circuits to a sufficient height for the Project to have sufficient clearance beneath them. SEPTA coordinated with PECO regarding tower replacement and identified monopoles as the type of structure PECO now uses for tower replacement; in-kind replacement is not possible. Conceptual engineering study indicates the monopoles would be approximately 125 to 160 feet tall depending on location and terrain. Monopoles have different spacing requirements than the existing steel lattice towers; as such, the number and locations of monopoles used as replacement structures may differ from the current number and locations of the steel lattice towers. PECO will be responsible for the design of the tower replacement that is required to implement the Project, and SEPTA will continue to coordinate with PECO during subsequent Project design.

The Definition of Effect and Criteria of Adverse Effect were applied to the PNJ Interconnection in Tables 9 and 10 in Attachment C. The Project may result in an **adverse effect** to the PNJ Interconnection because the Project will physically remove towers that are contributing elements to the resource, thereby diminishing the historic integrity of the historic property (Attachment C, Tables 1 and 10). However, despite these alterations, the PNJ Interconnection; Conowingo to Plymouth Meeting Transmission Line will functionally continue to serve its original purpose as a feeder of the PNJ Interconnection system and will continue to contribute to the overall significance of the resource.

Resolution of Adverse Effects

PECO will be responsible for the design and construction of tower replacement, and SEPTA will continue to coordinate with PECO as tower design progresses. FTA will notify the Advisory Council on Historic Preservation (ACHP) of the adverse effect finding, and is preparing a Memorandum of Agreement (MOA) among FTA, SEPTA, and the PA SHPO. The MOA will stipulate any minimization and mitigation measures agreed upon to resolve adverse effects resulting from replacement of towers that contribute to the NRHP-eligible PNJ Interconnection. FTA and SHPO previously discussed providing GIS mapping of the PNJ Interconnection: Conowingo to Plymouth Meeting Transmission Line for integration into PA SHPO's Cultural Resources Geographic Information System (CRGIS) as potential mitigation for the resolution of adverse effects. SEPTA and FTA are investigating this as a possibility and will consider other suggestions for potential mitigation received in a timely manner.

Archaeology

During initial Section 106 consultation for the Project, an APE for archaeology was defined as being the proposed limit of temporary and permanent land disturbance (May 2016 *Phase 1A Archaeological Survey Report for King of Prussia Rail Extension*, prepared by AECOM). On March 7, 2016, the SHPO concurred with the APE for archaeology.

The design refinements are generally within the previously studied APE for archaeology, but because of design shifts, some portions extend beyond the previously studied APE. The original APE for archaeology was modified in the areas of the design refinements to encompass permanent and temporary limits of disturbance. Figure 5 in Attachment A shows the previous and modified APEs for archaeology.

Probability for Archaeology - The *Phase 1A Archaeological Survey* concluded by stating that the previously studied APE for archaeology has been subjected to an extensive amount of prior grading, development, and other types of ground disturbance; as a result, additional archaeological investigation of the APE for archaeology is not recommended. The SHPO concurred with this finding on December 15, 2016.

Archaeologists examined the modified APE to determine archaeological sensitivity and probability of encountering intact belowground resources. Based on the comprehensive nature of prior earthmoving activities, archaeologists concluded that the modified APE for archaeology has a low sensitivity for prehistoric and historic archaeological resources. FTA finds that the findings of the *Phase 1A Archaeological Survey* apply to the modified APE for archaeology, and there is no need for additional evaluation of the modified APE for archaeology.

Consulting Party Coordination

In accordance with 36 CFR 800.1(c)(2), FTA and SEPTA identified parties that may be interested in reviewing and commenting on the proposed Project and FTA's findings. The following individuals/organizations are copied on this letter, as invitation to participate/continue to participate as Section 106 consulting parties: King of Prussia Historical Society; Historical Society of Montgomery County; Montgomery County Division of Parks, Trails and Historic Sites; Montgomery County Planning Commission; Upper Merion Planning Commission; Upper Darby Township; and PECO. The identified consulting parties are invited at this time to provide comment on the identification of historic properties and effects of the project on historic properties as presented in this letter and enclosures, and comment on or propose alternative ideas for mitigation measures to resolve adverse effects.

Parties wishing to participate in the Section 106 consultation process should notify Mr. Timothy Lidiak, FTA Community Planner, of their interest by November 2, 2020; his contact information is listed below.

Request for SHPO Concurrence

FTA seeks comment on the proposed modified architectural and archaeological APEs, identification of historic properties, and evaluation of effects. FTA also requests PA SHPO's concurrence with the following findings:

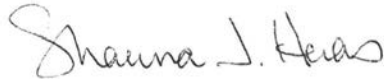
1. The determination of the PNJ Interconnection; Conowingo to Plymouth Meeting Transmission Line (Key No. 156601) as **eligible** for listing in the NRHP as contributing to the PNJ Interconnection;
2. the determination that the undertaking will result in **no adverse effect** to the Pennsylvania Turnpike: Delaware River Extension (Key No. 155679) and the Philadelphia and Western Railway (NHSL) (Key No. 128825);
3. the determination that the undertaking will result in **no historic properties affected** for the American Baptist Churches USA Mission Center (Key No. 203535), Market Street Elevated Railway Historic District (Key No. 105499), and 69th Street Terminal Square Shopping District (Key No. 156448);

4. the determination that the undertaking may result in **adverse effects** to the PNJ Interconnection; Conowingo to Plymouth Meeting Transmission Line (Key No. 156601); and
5. the determination that no further evaluation of the modified APE for archaeology is necessary.

FTA requests that PA SHPO and consulting party responses be received within 15 calendar days, based on the review schedule previously discussed and agreed to by FTA, SEPTA, and PA SHPO. As this date falls on a weekend, FTA will accept responses received by November 2, 2020. Note that FTA is preparing a draft MOA for the PNJ Interconnection property, and delivery to PA SHPO for discussion is anticipated for October 26, 2020.

If you have any questions or comments, please contact Mr. Timothy Lidiak, Community Planner, at (215) 656-7084 or tim.lidiak@dot.gov.

Sincerely,

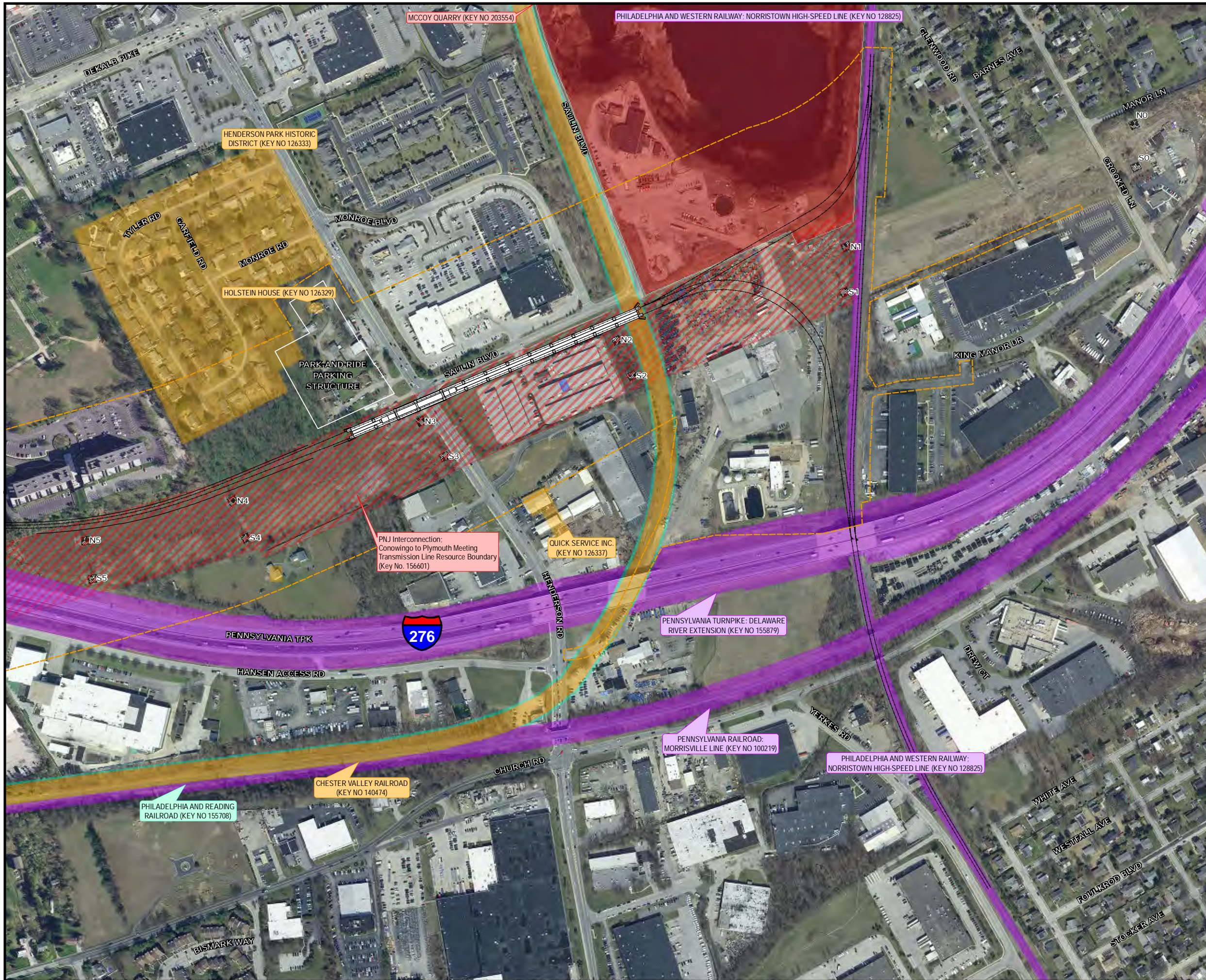


Shauna J. Haas
Environmental Protection Specialist

Attachments

cc: R. Judge (SEPTA)
M. Quinn (AECOM)
L. Roche (AECOM)
Mr. David Montalvo (KOP Historical Society)
Mr. Barry Rauhauser (Historical Society of Montgomery County)
Mr. David Clifford (Montgomery County Division of Parks, Trails and Historic Sites)
Mr. Scott France (Montgomery County Planning Commission)
Ms. Jacquelin Camp (Upper Merion Planning Commission)
Mr. Rob Loeper (Upper Merion Planning Commission)
Mr. Vincent Rongione, Esq. (Upper Darby Township)
Mr. Pete Kirlin (PECO)
Mr. John Halderman (PECO)

Attachment A: Figures and Photographs



Historic Architectural Resource

- Previously Identified**
- Listed/Eligible
 - Not Eligible
 - Undetermined
- Evaluated & Recommended**
- Not Eligible
 - Eligible
 - Potentially Eligible
- Modified APE for Historic Architecture

Proposed Improvements

- Aerial Structure
- PECO Tower
- Other Improvements
- Track Alignment

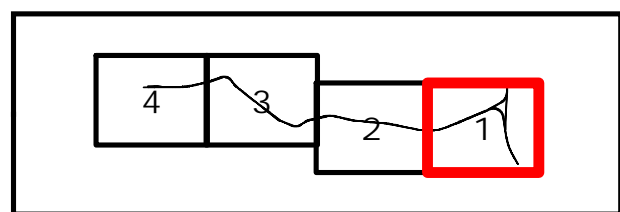
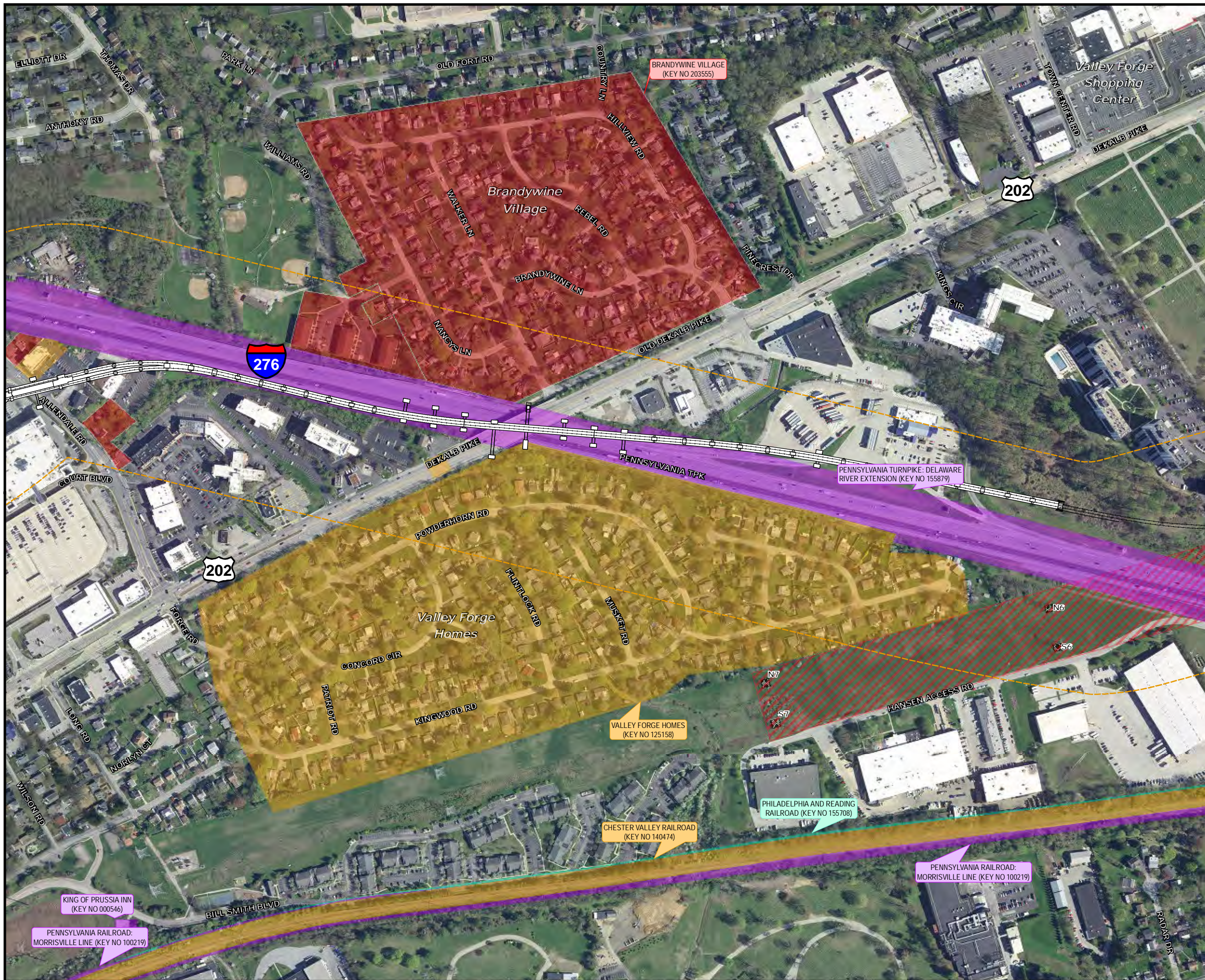


Figure 1a. KOP Rail Project: Preferred Alternative Plans.



Historic Architectural Resource

Previously Identified

Listed/Eligible
 Not Eligible
 Undetermined

Evaluated & Recommended

Not Eligible
 Eligible
 Potentially Eligible

Modified APE for Historic Architecture

Proposed Improvements

Aerial Structure
 PECO Tower

Other Improvements

Track Alignment

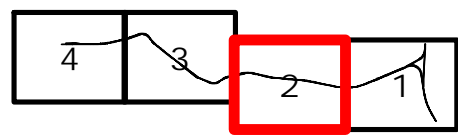
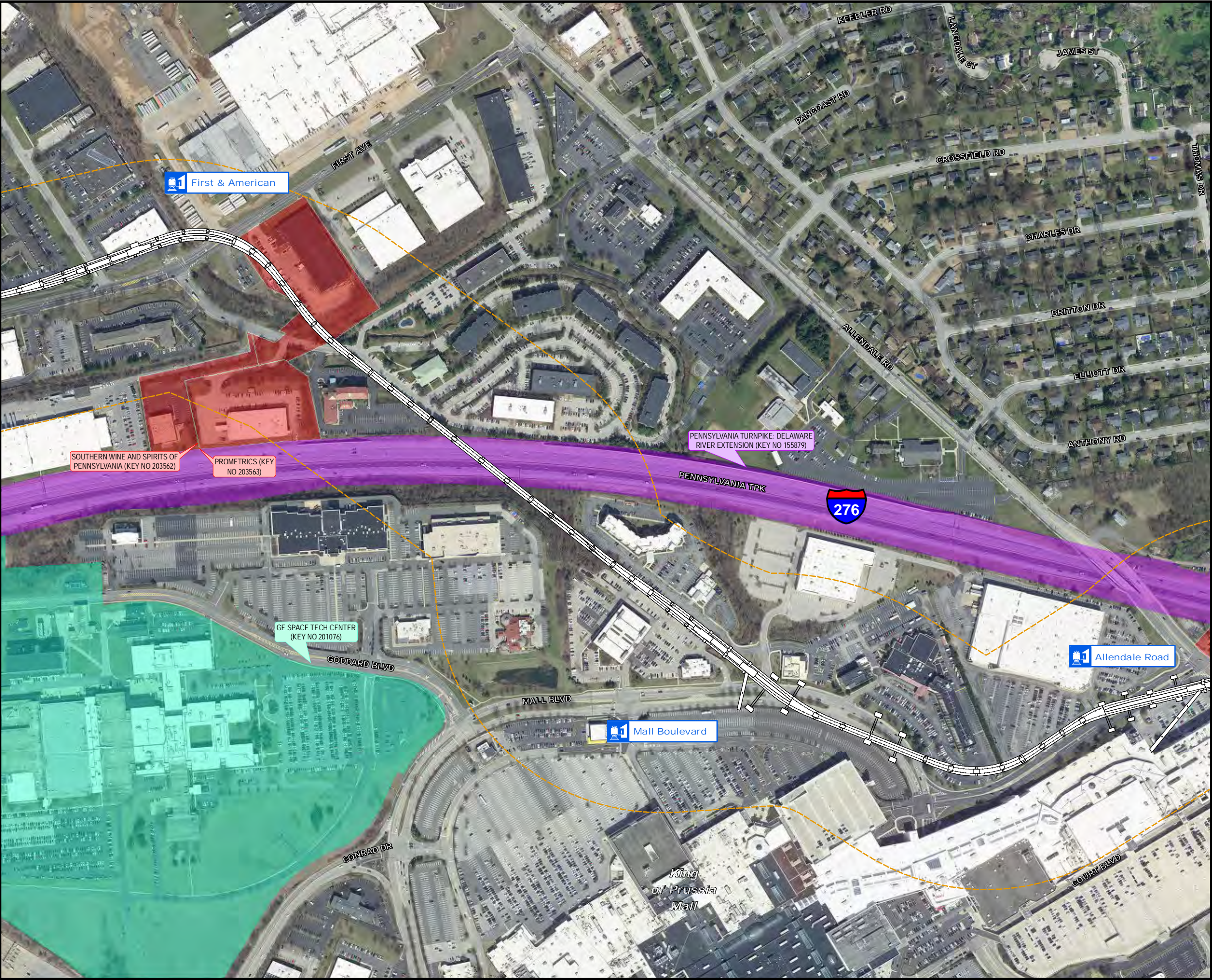


Figure 1b. KOP Rail Project: Preferred Alternative Plans.



Preferred Alternative: Sheet: 3 of 4
KOP Rail FEIS

Historic Architectural Resource

Previously Identified

- Listed/Eligible
- Not Eligible
- Undetermined

Evaluated & Recommended

- Not Eligible
- Eligible
- Potentially Eligible

Modified APE for Historic Architecture

Proposed Improvements

- Aerial Structure
- PECO Tower
- Other Improvements
- Track Alignment

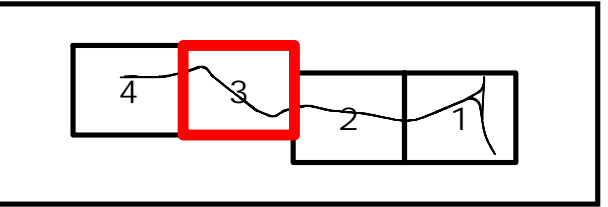
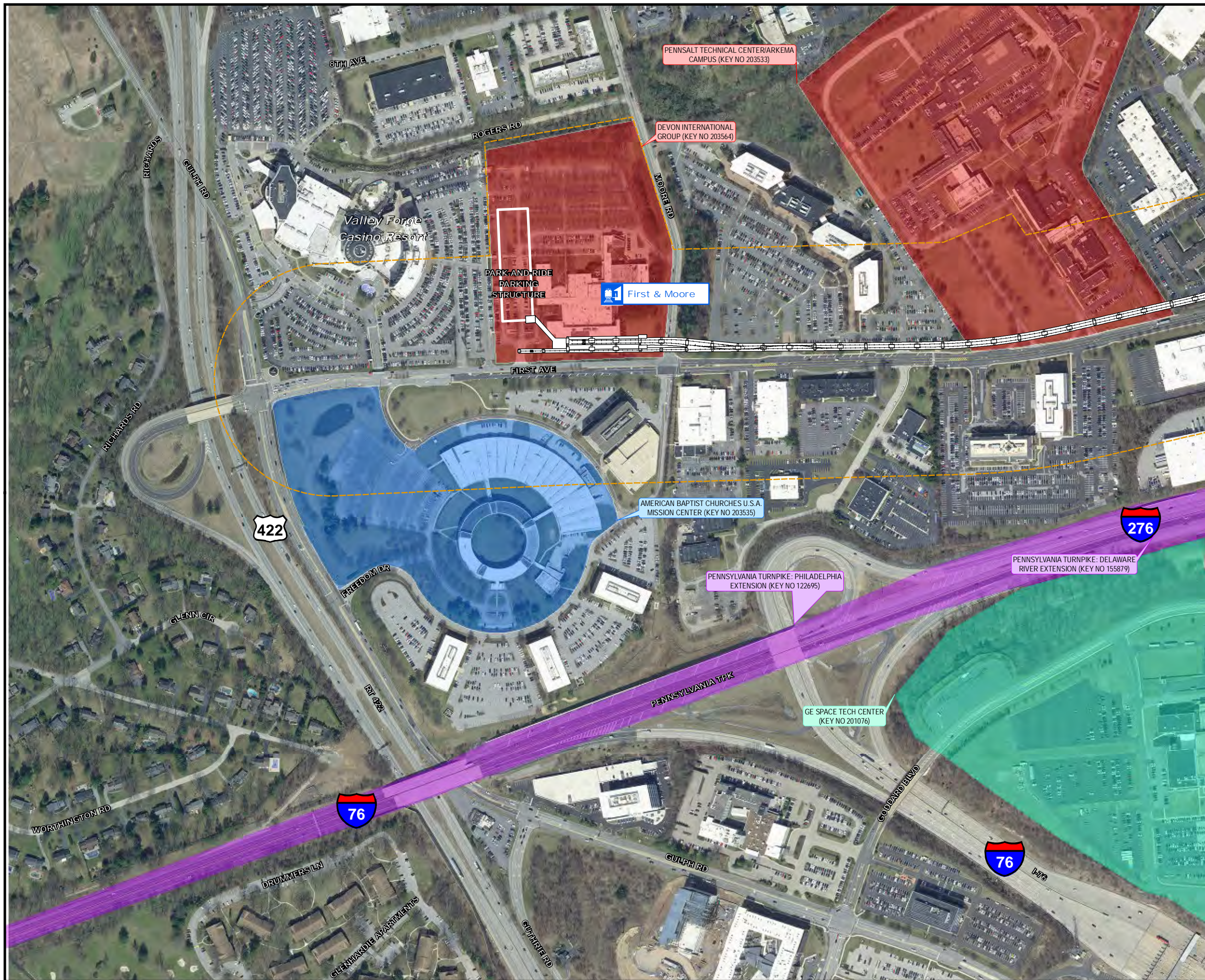


Figure 1c. KOP Rail Project: Preferred Alternative Plans.



Preferred Alternative: Sheet: 4 of 4
 KOP Rail FEIS

Historic Architectural Resource

Previously Identified

- Listed/Eligible
- Not Eligible
- Undetermined

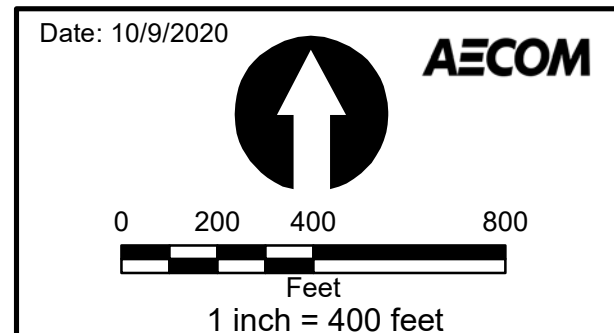
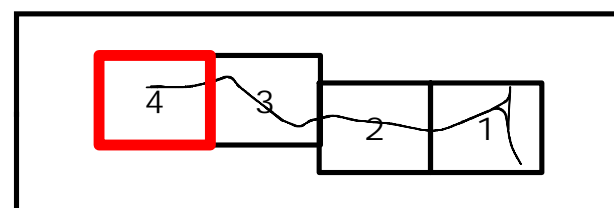
Evaluated & Recommended

- Not Eligible
- Eligible
- Potentially Eligible

Modified APE for Historic Architecture

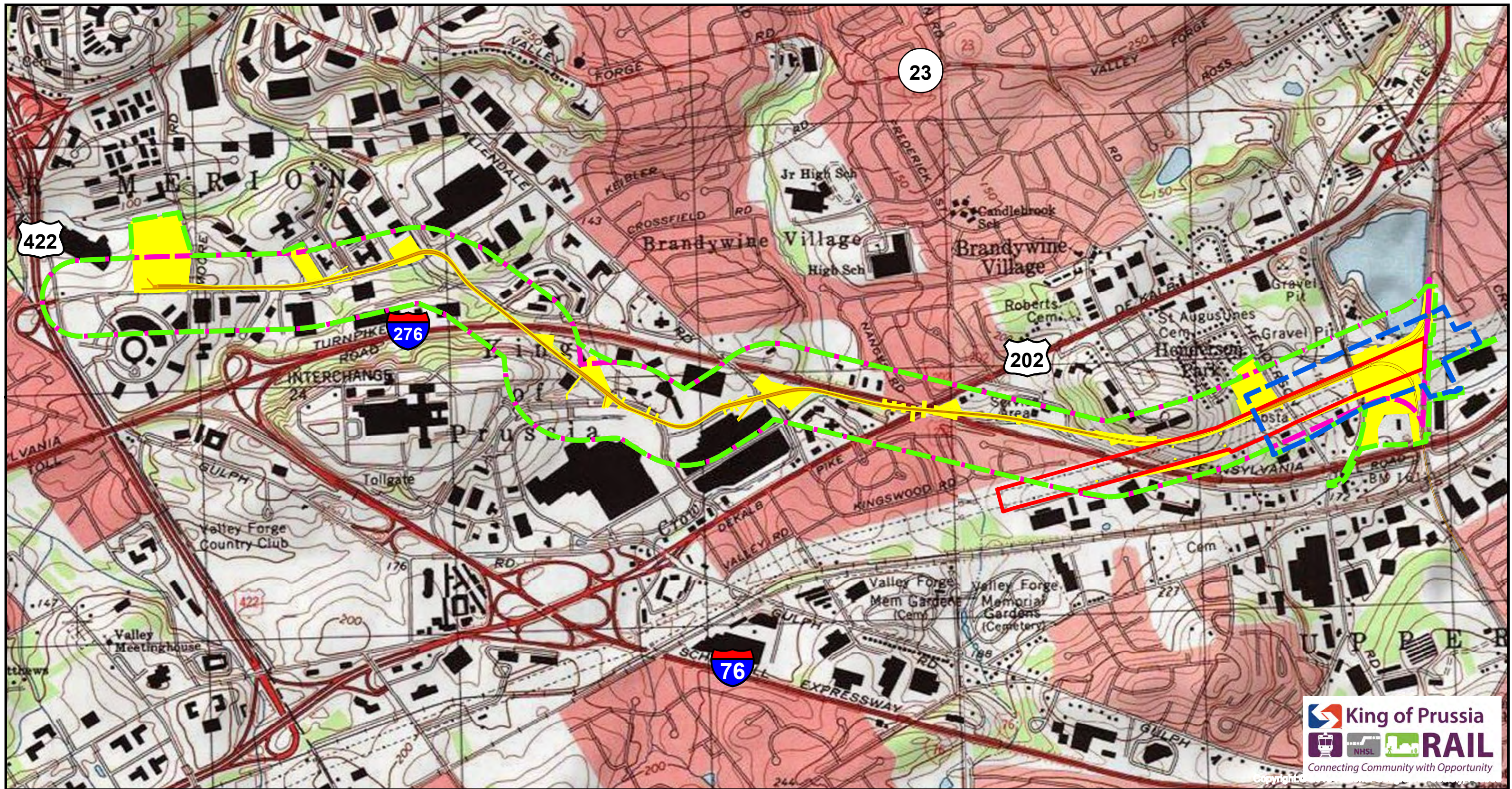
Proposed Improvements

- Aerial Structure
- PECO Tower
- Other Improvements
- Track Alignment



Source: 2018 PEMA Imagery, PASDA, PennDOT, HNTB & AECOM.

Figure 1d. KOP Rail Project: Preferred Alternative Plans.



Preferred Alternative: Previous and Modified APEs for Historic Architecture

10/2/2020
Source: Upper Merion Twp, SEPTA, PASDA, DVRPC, AECOM.

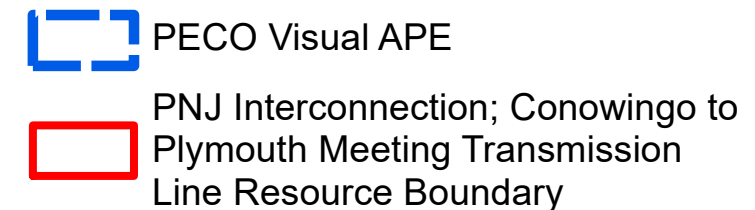
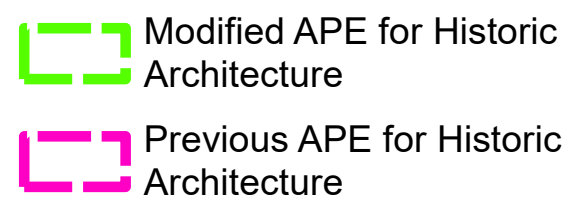
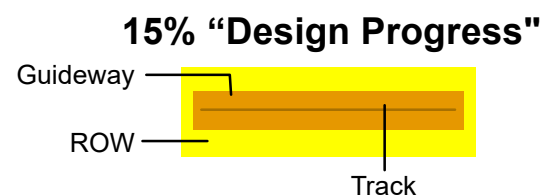


Figure 2. KOP Rail Project: Previous and Modified APEs for Historic Architecture.

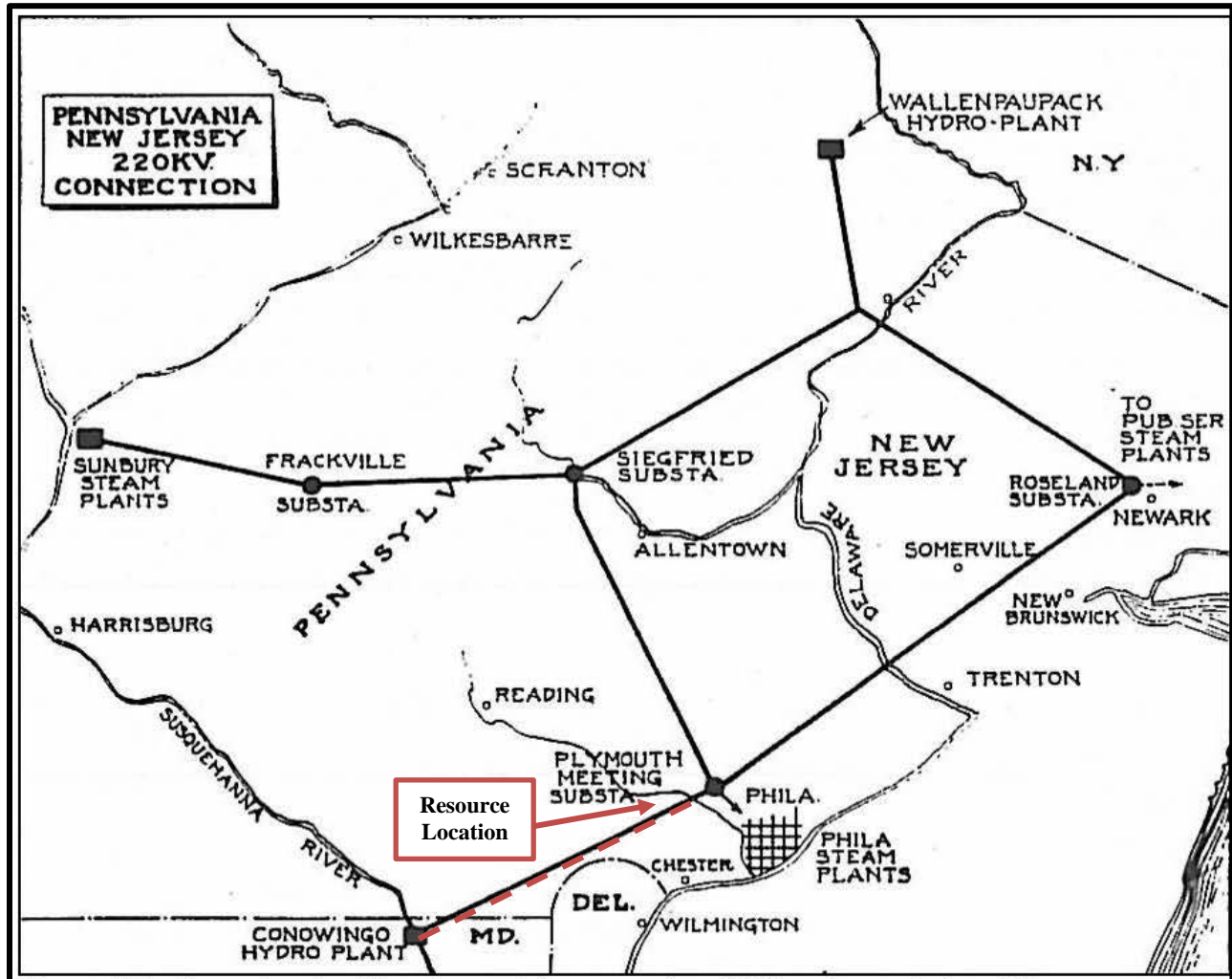
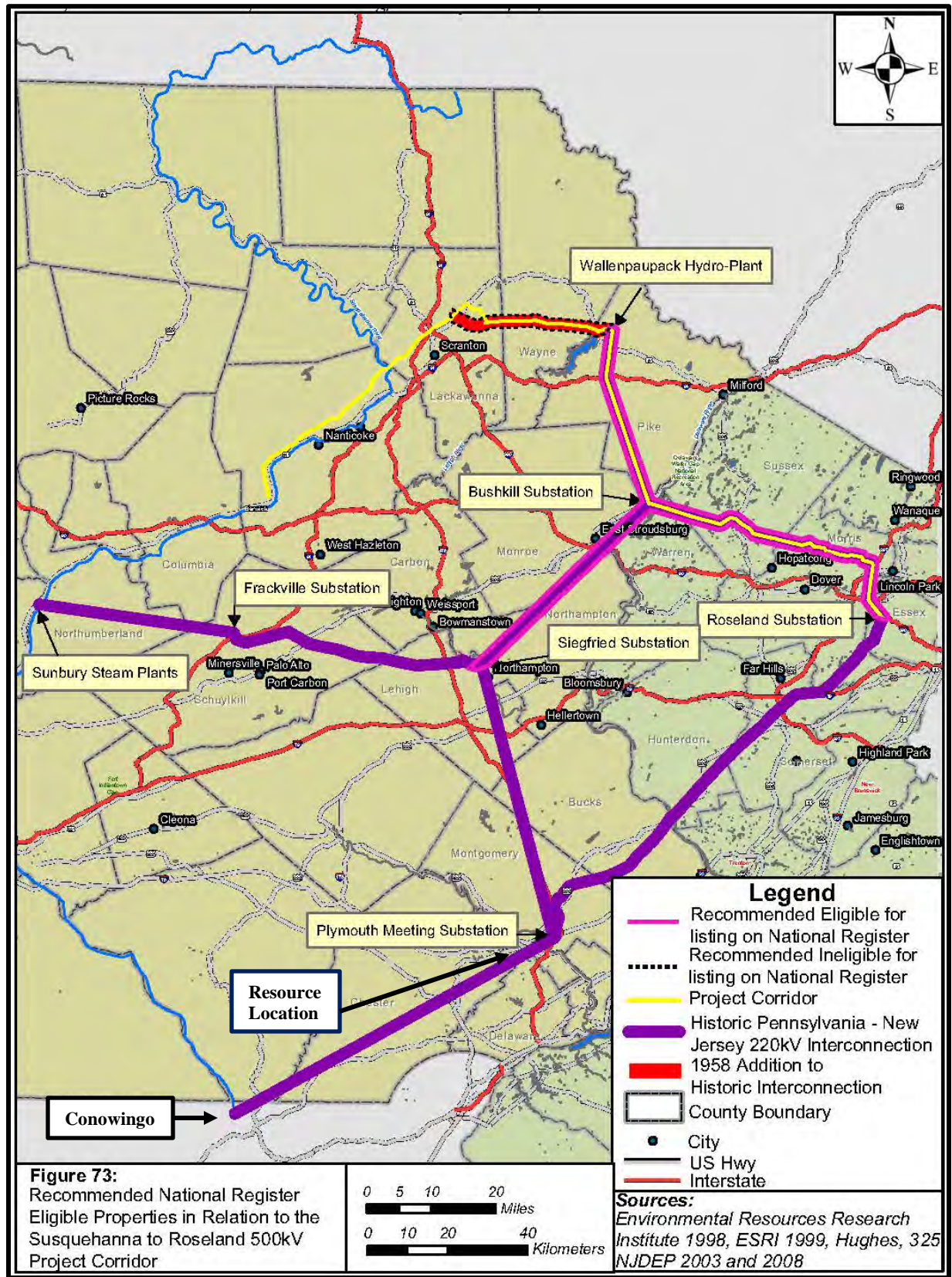
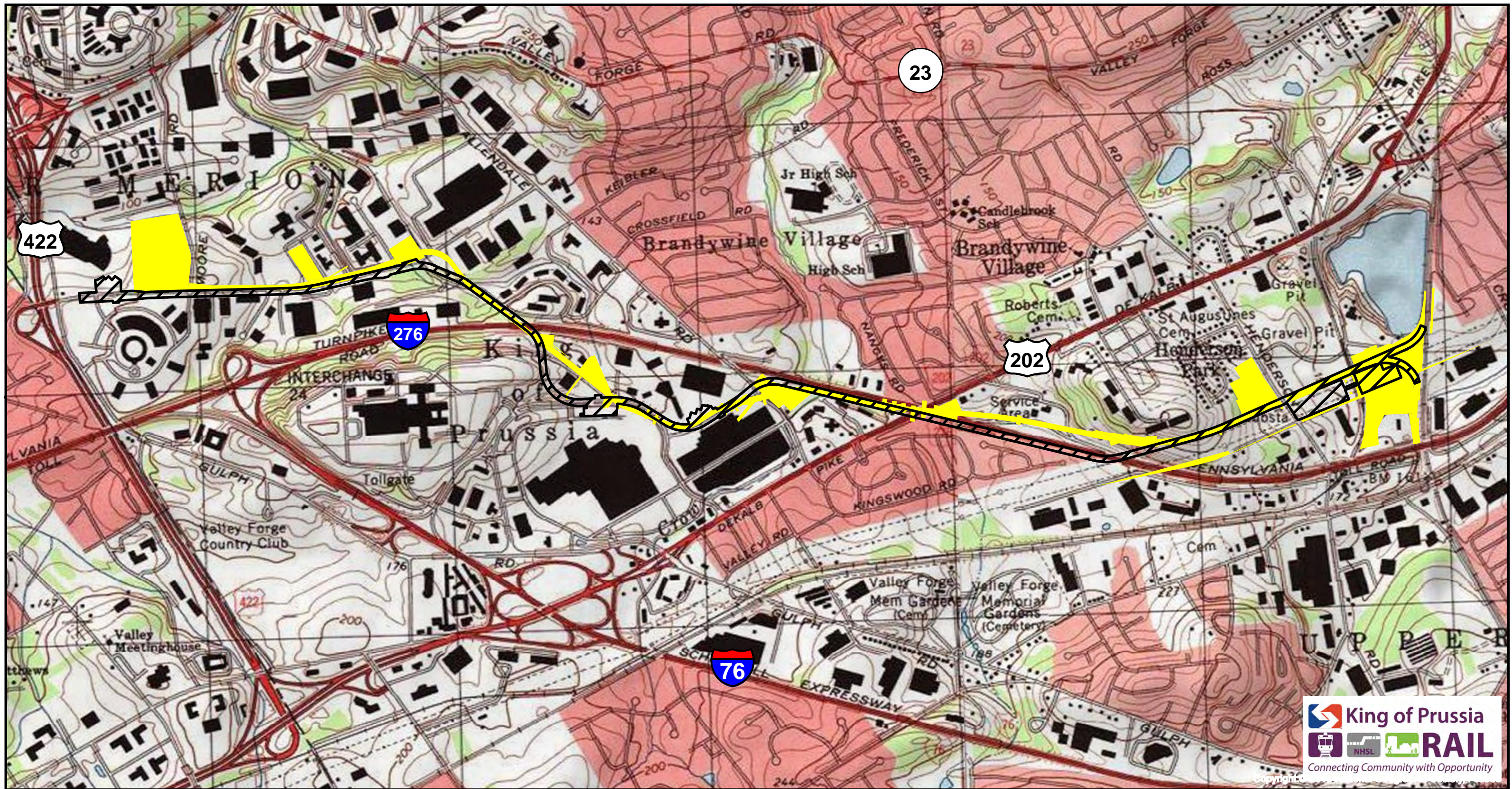
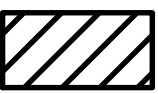


Figure 3. PNJ Interconnection Historical Map of Original System (Van Steen and McLane 2011:41). Markup shows location of PNJ Interconnection; Conowingo to Plymouth Meeting Transmission Line.





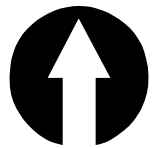
Preferred Alternative:
Previous and Modified APEs
for Archaeology



Previous APE for Archaeology



Modified APE for Archaeology



AECOM

0 600 1,200
Feet

Figure 5. KOP Rail Project: Previous and Modified APEs for Archaeology.

Attachment B: Historic Resource Survey Form

**PNJ Interconnection; Conowingo to Plymouth Meeting Transmission Line
(Key No. 156601)**

Historic Resource Survey Form

PENNSYLVANIA HISTORICAL AND MUSEUM COMMISSION
Bureau for Historic Preservation

Key # 156601

ER# 2013-1006-091

Date Prepared 09/30/2020

Name, Location and Ownership *(Items 1-6; see Instructions, page 4)*

HISTORIC NAME Pennsylvania - New Jersey (PNJ) Interconnection; Conowingo to Plymouth Meeting Transmission Line

CURRENT/Common NAME PECO Corridor

OWNER NAME/ADDRESS PECO, c/o Real Estate and Facilities, 2301 Market St., Philadelphia, PA 19103

TOTAL NUMBER OF RESOURCES 15

COUNTY Montgomery

MUNICIPALITY Upper Merion Township

USGS QUAD Norristown PA

LOCATION Extends between Norristown High Speed Line on the east and west end of Hansen Access Rd. on the west

STREET ADDRESS _____ ZIP 19406

CATEGORY OF PROPERTY ☐ Building ☒ District ☐ Object ☐ Site ☒ Structure

OWNERSHIP ☐ Private ☒ Corporate

☐ Public/Local ☐ Public/County ☐ Public/State ☐ Public/Federal

TAX PARCEL #/YEAR Multiple

Function *(Items 7-8; see Instructions, pages 4-6)*

Historic Function

Industry/Processing/Extracting

Subcategory

Industry/Processing/Extract - Energy Facility

Particular Type

Transmission Line

Current Function

Industry/Processing/Extracting

Subcategory

Industry/Processing/Extract - Energy Facility

Particular Type

Transmission Line

Property Features *(Items 15-17; see Instructions, pages 7-8)*

Setting Industrial; commercial; suburban

Ancillary Features

Transmission Towers

Access road

Conductors

Insulators

Acreage (round to nearest tenth) 45.5

Architectural/Property Information (Items 9-14; see Instructions, pages 6-7)**ARCHITECTURAL CLASSIFICATION**No Classification

_____**EXTERIOR MATERIALS and STRUCTURAL SYSTEM**

Foundation	Steel	Concrete
Walls	_____	_____
Roof	_____	_____
Other	Steel	_____
Structural System	Steel Frame	_____

WIDTH _____ (feet) or _____ (# bays) **DEPTH** _____ (feet) or _____ (# rooms) **STORIES/HEIGHT** _____
Historical Information (Items 18-21; see Instructions, page 8)Year Construction Began 1926 ☐ Circa Year Completed 1928 ☐ CircaDate of Major Additions, Alterations _____ ☐ Circa _____ ☐ Circa _____ ☐ CircaBasis for Dating ☒ Documentary ☐ PhysicalExplain Dating is based on documentary research and historic photographs/aerial views.Cultural/Ethnic Affiliation(s) N/AAssociated Individual(s) N/AAssociated Event(s) N/AArchitect(s) Day & ZimmermanBuilder(s) Day & Zimmerman**Submission Information** (Items 22-23; see Instructions, page 8)Previous Survey/Determinations PNJ Interconnection; Wallenpaupack to Siegfried sector (2011)/EligibleThreats ☐ None ☐ Neglect ☒ Public Development ☐ Private Development ☐ OtherExplain Resource is in the APE of the SEPTA King of Prussia Rail Project

This submission is related to a ☐ non-profit grant application ☐ business tax incentive

☒ NHPA/PA History Code Project Review ☐ other

Preparer Information (Items 24-30; see Instructions, page 9)Name & Title Katherine Farnham (Sr. Architectural Historian) and Samuel A. Pickard, Jr. (Historian)Date Surveyed October 2, 2020 Project Name SEPTA King of Prussia Rail ProjectOrganization/Company AECOMMailing Address 625 W. Ridge Pike, Suite E-100, Conshohocken, PA 19428Phone (610) 234-0420Email katherine.farnham@aecom.com

National Register Evaluation *(Item 31; see Instructions, page 9)*
(To be completed by Survey Director, Agency Consultant, or for Project Reviews ONLY.)☐ Not Eligible (due to ☐ lack of significance and/or ☐ lack of integrity)☐ Eligible Area(s) of Significance _____

Criteria Considerations _____ Period of Significance _____

☒ Contributes to Potential or Eligible District District Name Pennsylvania-New Jersey (PNJ) Interconnection;
Wallenpaupack to Siegfried Transmission Line**Bibliography** *(Item 32; cite major references consulted. Attach additional page if needed. See Instructions, page 9.)*

See Continuation Sheet

Additional Information

The following must be submitted with form. Check the appropriate box as each piece is completed and attach to form with paperclip.

- ☒ Narrative Sheets—Description/Integrity and History/Significance (See Instructions, pages 13-14)
- ☒ Current Photos (See Instructions, page 10)
- ☒ Photo List (See Instructions, page 11)
- ☒ Site Map (sketch site map on 8.5x11 page; include North arrow, approximate scale; label all resources, street names, and geographic features; show exterior photo locations; See Instructions, page 11)
- ☐ Floor Plan (sketch main building plans on 8.5x11 page; include North arrow, scale bar or length/width dimensions; label rooms; show interior photo locations; See Instructions, page 11)
- ☒ USGS Map (submit original, photocopy, or download ; See Instructions, page)

Send Completed Form and Additional Information to:

National Register Program
Bureau for Historic Preservation/PHMC
Keystone Bldg., 2nd Floor
400 North St.
Harrisburg, PA 17120-0093

Bibliography (Item 32)

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2020b Territory Served. Electronic document, <https://www.pjm.com/about-pjm/who-we-are/territory-served.aspx>, accessed 25 September 2020.

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2014 *To Develop the State of New Jersey and Make it a Better Place to Live: Roseland to Bushkill, SR 500kV Transmission Project*. Electronic document, https://www.psegtransmission.com/sites/default/files/file/files/susquehanna-roseland/develop_roseland_bushkill/To%20Develop%20the%20State%20of%20New%20Jersey.pdf, accessed 28 August 2020.

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1925 Work on Giant Power Plant to Start in Spring. 4 January:16.

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1992a *Norristown, PA*. Topographic 7.5-minute quadrangle. USGS, Reston, Virginia.

1992b *Valley Forge, PA*. Topographic 7.5-minute quadrangle. USGS, Reston, Virginia.

Van Steen, Deborah, and Abbie Hurlbut

2011 Pennsylvania—New Jersey (PNJ) Interconnection; Wallenpaupack to Siegfried Transmission Line. Historic Resource Survey Form. BHP Key # 156601. ER# 09-0592-042-II. On file at the Pennsylvania State Historic Preservation Office, Harrisburg, Pennsylvania.

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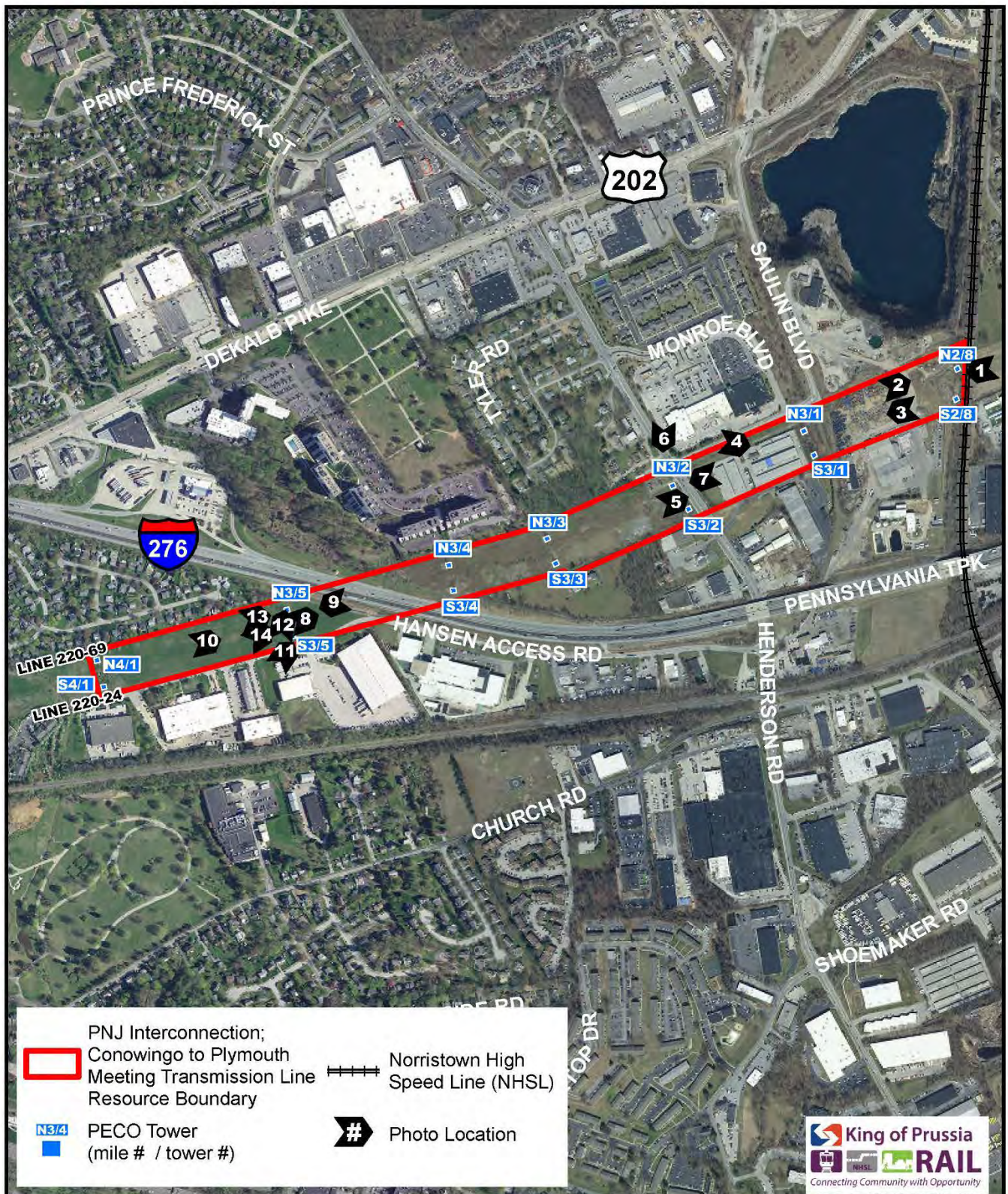
Wainwright, Nicholas B.

1961 *History of the Philadelphia Electric Company, 1881-1961*. Philadelphia Electric Company, Philadelphia, Pennsylvania.

Photo List (Item 33)Photographer name Katherine FarnhamDate 9/14/2020Location Negatives/Electronic Images Stored AECOM, 625 W. Ridge Pike, Suite E-100, Conshohocken, PA 19428

Photo #	Photo Subject/Description	Camera Facing
1	PNJ Interconnection; Conowingo to Plymouth Meeting Transmission Line. East end of resource; view looking southwest across NHSL from PECO ROW at Crooked Lane.	SW
2	View looking northeast from Republic Services toward easternmost tower pair 2/8.	NE
3	Transmission corridor looking southwest from Republic Services property toward tower pair 3/1.	SW
4	View looking east from Saulin Blvd. vicinity; tower pair 3/1 in foreground.	E
5	View looking northeast from Henderson Rd. showing tower pairs 3/1 (front) and 2/5 (at rear).	NE
6	Side view of tower pair 3/2 at Henderson Rd., view to south.	S
7	View to southwest up steep hill from Henderson Rd.; tower 3/2 at right. Note access road entrance at center and small electrical yard behind tower.	SW
8	Tower pairs 3/4 in foreground and 3/3 in background, view to northeast across the PA Turnpike.	NE
9	View of west end of resource looking southwest along Hansen Access Rd. above the PA Turnpike.	SW
10	View from west end of resource looking northeast across the PA Turnpike.	NE
11	South tower in 3/5 pair showing oblique view with typical details; view to northeast.	NE
12	North tower in 3/5 pair showing side view with typical details, view to northeast.	N
13	Upward detail view to northeast of upper part of north tower in 3/5 pair, showing typical arrangement of three conductors with vertical insulator strings, and two grounding wires at top.	NE
14	Detail of southwest anchor foot of north tower in 3/5 pair, view to northeast.	NE
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Site Plan (Item 34)

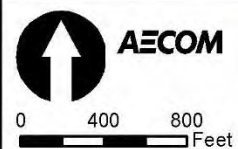


Pennsylvania-New Jersey (PNJ)
Interconnection;
Conowingo to Plymouth Meeting
Transmission Line

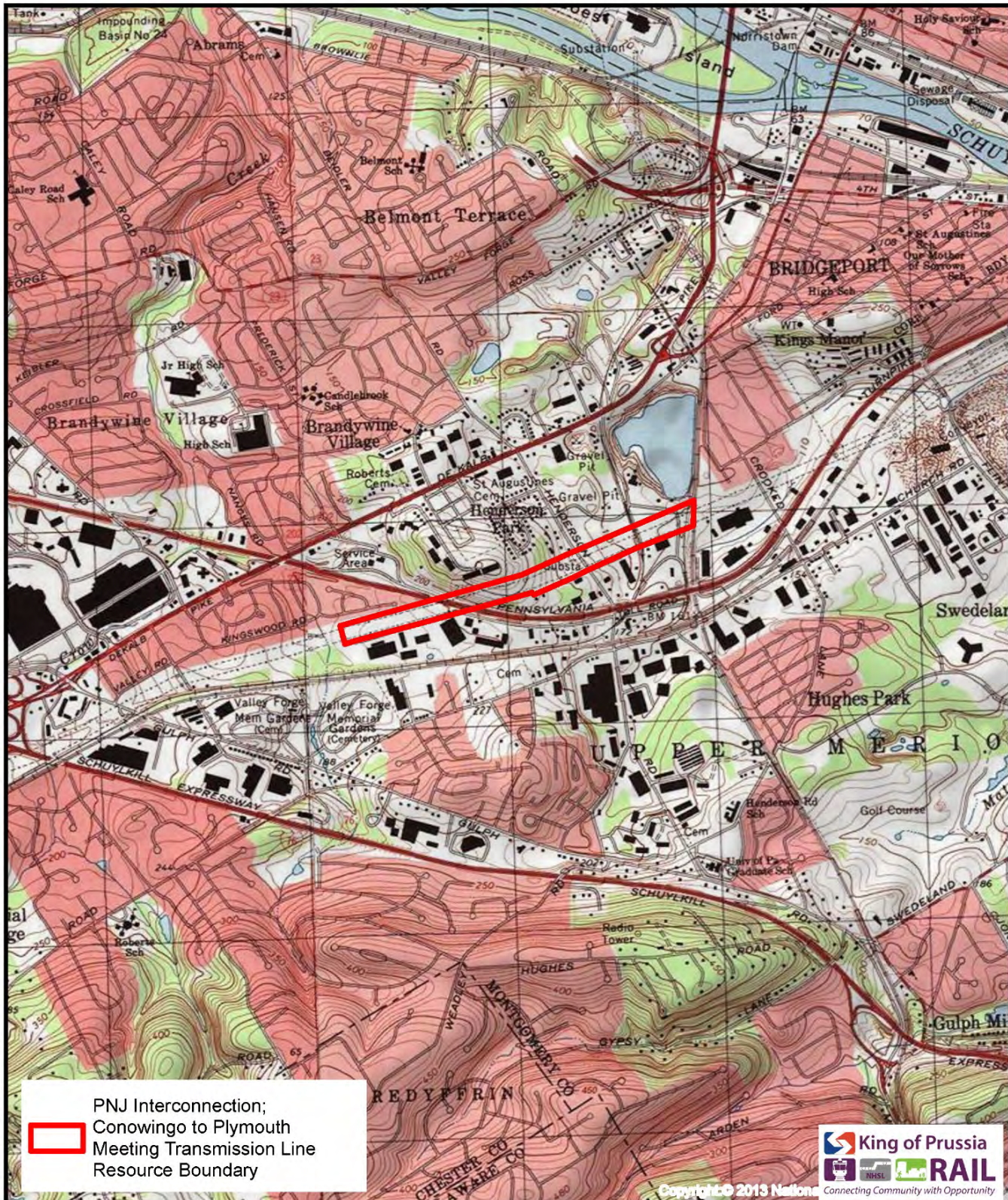
Source: Upper Merion Twp, SEPTA, PASDA, DVRPC, AECOM

Norristown High Speed Line to
West End of Hansen Access Road
Upper Merion Township
Montgomery County
PA SHPO Key No. 156601

10/1/2020



USGS Map (Item 36)

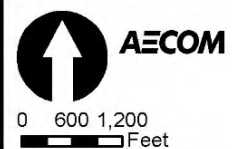


**Pennsylvania-New Jersey (PNJ)
Interconnection;
Conowingo to Plymouth Meeting
Transmission Line**

Source: Copyright © 2013 National Geographic Society, i-cubed. USGS Valley Forge, PA and Norristown, PA Quad Maps.

Norristown High Speed Line to
West End of Hansen Access Road
Upper Merion Township
Montgomery County
PA SHPO Key No. 156601

10/1/2020



Physical Description and Integrity (Item 38)

Introduction:

This resource is documented as an additional sector of the previously recorded Pennsylvania-New Jersey (PNJ) Interconnection; Wallenpaupack to Siegfried Transmission Line (Key No. 156601), which was recorded in a Historic Resources Survey Form (HRSF) and corridor report in 2011 for the Susquehanna to Roseland 500kV Project (Van Steen and Hurlbut 2011; Van Steen and McLane 2011). The line was determined eligible for the National Register of Historic Places (NRHP) in 2011 (MacDonald 2011). The PNJ Interconnection is a 210-mile ring-shaped high-voltage transmission system built to service Pennsylvania and New Jersey and completed in 1928 (Figures 1 and 2). The system was originally fed by three generation plants: a hydroelectric plant at Lake Wallenpaupack, PA; a hydroelectric plant on the Susquehanna River at Conowingo, MD; and a steam plant facility at Sunbury, PA. The plants fed into substations located at Siegfried and Plymouth Meeting, PA and Roseland, NJ. From the substations, power was fed into the overall grid. The Susquehanna to Roseland 500kV Project documented the northernmost PNJ Interconnection sectors, i.e. those connecting the Wallenpaupack Hydroelectric Plant with the Siegfried, Bushkill, and Roseland Substations. The PNJ Interconnection plants, substations, and transmission lines were designed and built by three regional utility companies, Pennsylvania Power & Light Company (PP&L), the Philadelphia Electric Company (PECO), and Public Service Electric & Gas Company (PSE&G) of New Jersey. The sectors documented in 2011, which spanned both Pennsylvania and New Jersey, were constructed by PP&L and PSE&G. Other sectors of the PNJ Interconnection system, including the sectors built by PECO, were referenced in the PNJ Interconnection HRSF, but not identified or mapped in the Pennsylvania Historic Preservation Office (PA SHPO) CRGIS system.

The subject resource is a 220kV transmission line constructed and owned by the Philadelphia Electric Company (PECO), now known as PECO Energy Company. Completed in 1928, it is part of an original sector of the PNJ Interconnection system, connecting the Conowingo Hydroelectric Power Station on the Susquehanna River in Maryland to the Plymouth Meeting Substation. Power from the plant is directed in a northeasterly direction over approximately 60 miles of transmission lines through Cecil County, Maryland and Chester and Montgomery Counties, Pennsylvania to the Plymouth Meeting Substation. From Plymouth Meeting, Conowingo power flows into the Interconnection via the two southernmost transmission sectors in the ring-shaped system: the Plymouth Meeting to Siegfried (PA) sector, which was built by PECO and runs roughly northwest from Plymouth Meeting to Siegfried, and the Plymouth Meeting to Roseland (NJ) sector, which runs roughly northeast across the Delaware River into central New Jersey. PECO constructed and owns the Plymouth Meeting to Roseland sector between Plymouth Meeting and the Delaware River, while PSE&G constructed and owns the portion between the Delaware River and Roseland. A portion of the electricity generated at Conowingo is also directed from the Plymouth Meeting Substation toward Philadelphia via a lower-voltage 66kV transmission line.

Resource Boundary:

The subject resource consists of two parallel lines of conductors supported by steel-lattice transmission towers, with towers arrayed in corresponding pairs and numbered by mile and station (3/1, 3/2, etc.). The overall transmission line sector, of which the subject resource is a small portion, is approximately 60 miles long, including hundreds of towers bookended by a massive generating plant and a substation and passing through two states and three counties. Documentation and evaluation of the PNJ Interconnection; Conowingo to Plymouth Meeting Transmission Line is being undertaken due to a small portion of the line falling inside the APE of the SEPTA King of Prussia Rail Project.

Previous guidance on documentation and evaluation of transmission lines is limited, but was consulted to aid in developing an appropriate boundary for the resource. Due to the massive geographic span and complex nature of transmission line systems, prior guidance recommends treating transmission lines as a historic district, in which component structures may not be individually distinctive or eligible, but contribute to the significance of the overall resource (Adams 2010: 20; Van Steen and Hurlbut 2011:59).

In addition, guidance developed for evaluating historic transmission lines in California states:

Generally, the boundaries of an electric transmission structure and its associated system will include the power station, or substation, and all the structures in the transmission line system from the station to the end. In many cases, an entire system will only be evaluated if the project or undertaking involves changes made to the entire system and each component thereof. If a single or small number of electric transmission structures fall in the

APE of a given project or undertaking, then the boundary should only include those structures as well as a sample of other structures in that system that are outside of the established boundary for comparison. The boundary should also include associated features that contribute to the construction or maintenance of the structure, such as maintenance roads (Adams 2010:32-33).

Based upon the precedent of the previous PNJ Interconnection documentation, the width of the resource boundary corresponds to the linear PECO right-of-way, which in this area is approximately 350 feet wide. Given the overall length of the Conowingo to Plymouth Meeting corridor and the comparatively small portion within the SEPTA King of Prussia Rail Project APE, guidance suggests that documentation of the full corridor is not warranted. As such, a shorter-length resource boundary corresponding to the APE was determined based upon guidance for evaluating transmission lines. The length of the boundary spans slightly beyond the length of the PNJ Interconnection's overlap with the APE for the SEPTA King of Prussia Rail Project. In total, the boundary contains one access road and 14 transmission towers, 12 of which are inside the project APE. All 15 structures within the boundary contribute to the resource.

Resource Description:

The subject segment of the PNJ Interconnection is approximately 5,950 feet (1.1 mile) long and 350 feet wide (see Site Plan on p. 7 and USGS Map on p. 8). It extends west from the Norristown High-Speed Line (NHSL) across Henderson Road and the Pennsylvania Turnpike, and terminates at tower pair 4/1 near the west end of Hansen Access Road. The landscape over which the PNJ Interconnection traverses between the NHSL and Henderson Road is heavily developed with industrial and commercial properties, including a quarry, recycling plant, and self-storage complex. Modern buildings and parking lots occupy some of the PNJ Interconnection's right-of-way below the transmission line between the NHSL and Henderson Road (Photographs 1-6). West of Henderson Road, the PNJ Interconnection corridor climbs a steep brush-covered hill, and then descends gradually across the Pennsylvania Turnpike, which is in a cut on a southeast-northwest trajectory at this location. Modern apartment towers line the crest of the hill overlooking the PNJ Interconnection corridor east of the Turnpike. On the west side of the Turnpike, the resource passes across open mown grass and runs along the north side of Hansen Access Road, which has industrial/office parks along its south side. The Valley Forge Homes neighborhood is located to the north between the PNJ Interconnection corridor and the Turnpike. Throughout the corridor, most tall vegetation has been cleared but the tower bases are surrounded by brush and shrubs in most places (Photographs 7-10). One access road is extant and contributes to the resource; it is an unpaved track leading from the west side of Henderson Road uphill to the west (Photograph 7).

The 14 transmission towers within the resource boundary are standardized four-legged steel lattice structures which are approximately 85' in height. They are constructed of individual girders of rolled steel, cross-braced and attached with bolts in a manner similar to steel truss bridges, and painted silver-gray. Due to their large size, towers of this type could not be transported as a full structure, and were typically manufactured in smaller pieces and assembled onsite (Hayes 2005:235). The towers have a roughly X-shaped profile as viewed from the front or back, with a narrow "waist" and a horizontal crossbar at the top of the X (Photographs 11-12). From the side, they have a "trident" profile (Photographs 6 and 12). Each line of towers carries a trio of 220kV conductors (power lines). Three conductors are suspended from the base from each tower's crossbar by a vertical strand of 14 insulators (Photograph 13). Two thin grounding wires are attached to the top of each tower, aligned above the space between the center conductor and the flanking conductors. The tower legs bear applied yellow-and-black identification number stickers and are anchored into the ground with underground spread steel grillages embedded in concrete (Photograph 14). Only steel components of the footings were visible in the field; concrete components appear to be well below grade with vegetation growing over them.

Integrity:

The earliest available historic aerial views for this area, dating from 1942, indicate that steel lattice transmission towers were located on the exact sites of the extant towers. Based on 1931 historic photographs of other PECO-built towers in the original system (Van Steen and Hurlbut 2011:13-14), the extant towers appear to be original infrastructure, as they match one of the standard PECO designs used in the original construction (Figure 3). No evidence has been uncovered to indicate that the towers were rebuilt or moved in subsequent years, or that the number of connectors has changed. The resource thus

retains integrity of location, design, materials, and workmanship. The transmission line lacks integrity of setting due to the intense suburbanization and industrial development that occurred in this part of Upper Merion Township following World War II, which also included construction of the Delaware River Extension of the Pennsylvania Turnpike (I-276) through the PECO right-of-way in the 1950s. Despite changes to the surrounding area, the positioning and height of the dual tower pairs and the cleared space in the ROW between them is a characteristic landscape feature of the line that appears to have been retained from early on, and as such the resource retains integrity of feeling. Documentary research clearly indicates that the transmission line resource is associated with the 1926-1928 development of the Conowingo Hydroelectric Plant, Plymouth Meeting Substation, and the overall PNJ Interconnection; thus, the resource retains integrity of association.

The previous HRSF noted the conductors for the Wallenpaupack to Siegfried and Bushkill to Roseland sectors of the PNJ Interconnection were upgraded from 220kV to 230kV in 1965, and new ground wires were added in 1972. It is likely that similar alterations have been made to the Conowingo to Plymouth Meeting sector of the PNJ Interconnection, although documentary records of such have not been located. However, the authors note that “These upgrades are considered an infrastructure modification that are (sic) necessary in order for the utility to evolve in response to modern technological advancements and to continue to serve its vital function. Modifications, such as replacement of wires, brackets, ground wires, and similar fixtures are not considered significant alterations to the resource and, therefore, do not detract from the integrity of the corridor” (Van Steen and Hurlbut 2011:59).

History and Significance (Item 39)

History of PECO and its Role in the PNJ Interconnection:

The history of PECO, which constructed the subject sector, is an addendum to the extensive historic context provided in the PNJ Interconnection; Wallenpaupack to Siegfried Transmission Line HRSF prepared in 2011. This historic overview is intended to provide additional information on PECO's history and role in the development of the PNJ Interconnection, to aid in evaluating the significance of the subject sector, given that little specific information on the PECO-built sectors was provided in the earlier documentation.

The Philadelphia Electric Company (PECO) was formed in 1902 to consolidate the various electric power companies operating in Philadelphia. The company was unable to produce enough power to meet demand, so in 1903 it opened Schuylkill Station A at 28th and Christian Streets in South Philadelphia with a 5000-kW alternator. By 1915, this power station, upgraded to 81,000 kW, had been joined by a second, 65,000 kW station. Demand for power continued to grow and again pushed the system to capacity in the years immediately following World War I. The industrial and commercial demand for power was rapidly increasing, as was that by transportation companies. The Philadelphia Rapid Transit Company's (PRT) system had used PECO's power since 1910, and starting in 1915, the Pennsylvania Railroad began electrifying its commuter lines. Additionally, the 1920s saw a rapid growth in the number and use of electrical appliances in the domestic sphere (Geasey 1995:134-135).

In the late 1910s and first half of the 1920s, PECO opened and then quickly expanded three power stations—Chester, Delaware, and Richmond. Despite this, there was often not enough capacity to handle peak loads and no reserve capacity. Even when able to meet demand, the steam power stations were dependent on a steady supply of coal, which not only presented an additional expense but could be interrupted by striking miners, as it was in 1919. The potential solution to this issue was found via hydroelectric generation on the Susquehanna River (Geasey 1995:135-136).

A hydroelectric dam on the Susquehanna at Holtwood, Pennsylvania had been constructed in 1910 by the Pennsylvania Water & Power Company to supply electricity to York and Baltimore. PECO had discussed building another hydroelectric dam several miles downstream at Conowingo, Maryland with the Federal Government during World War I, though the project did not proceed due to the length of time it would take to complete it. The project was revived in the early 1920s, and PECO entered into negotiations with the Susquehanna Power Company, which owned the land needed for a dam. After two years of negotiations, a deal was worked out in 1924 by which PECO would purchase the Susquehanna Power Company and construct a \$59,000,000 dam that could produce 237,500 kW (Wainwright 1961:167-170). In comparison, the six steam plants PECO operated had a combined capacity of 529,000 kW in 1926 (Geasey 1995:136).

The planned hydroelectric station at Conowingo also represented a substantial savings for PECO. The facility would preclude the need for another station on the Schuylkill River and would save the company 750,000 tons of coal annually. Also, unlike the steam plants, which would take an hour and a half to have an emergency 36,000 kW unit ramp up, emergency power from the Conowingo station could be brought online in one minute. Due to the varied flow of the Susquehanna River, the Conowingo station would provide the base load of power when the water was high, with the steam plants making up the difference. When the water was low, the roles would be reversed, with the Conowingo station making up the difference. Overall, the power complex would be the second largest hydroelectric facility in the nation, surpassed only by the plant at Niagara Falls (Wainwright 1961:171, 178; *Sun*, 4 January 1925:16).

Initial borings and surveys for the dam were constructed in summer 1924. PECO created the Philadelphia Electric Power Company (PEPCO) as a subsidiary to own and operate the reservoir and transmission lines outside of PECO's territory. PEPCO would own Susquehanna Power Company, which owned the infrastructure in Maryland. While challenged in public utilities hearings by PRT, PECO won both state and federal approval for the project, which would cross state lines (Wainwright 1961:173-177; *Sun*, 13 January 1926:24, 4). Construction on the Conowingo dam began in March 1926 and by August, the first concrete for the project was being poured. The firm of Stone & Webster designed the Conowingo facility and constructed the powerhouse and a portion of the 4,648-foot-long dam. The construction of the transmission lines from the dam was undertaken by Day & Zimmerman. The lines were strung from a paired series of steel towers, which each supported three, one-inch diameter steel-core aluminum power cables (conductors) which could operate at 220 kV (Wainwright 1961:179-181).

PECO was still challenged by the need to connect Conowingo's power to the City of Philadelphia. The initial plan called for power to be routed to the Schuylkill power stations in Philadelphia by 132 kV lines, but it was determined that it was too expensive to build the lines through the necessary suburban and urban areas between Conowingo and Philadelphia, which were already densely developed (Wainwright 1961:179-181). The solution presented itself through a deal PECO was negotiating with the Pennsylvania Power & Light Company (PP&L) and the Public Service Electric & Gas Company of New Jersey (PSE&G). The plan was to create a massive interchange between the three utility companies—a concept known as superpower—and at 3,000,000 horsepower it would create the “largest pool of electric power in the world” (Wainwright 1961:181; Van Steen and Hurlbut 2011:43-44). Initially announced in February 1927 by PECO and PP&L, the three companies signed an agreement in September of that year to form the P.A. – N.J. Interconnection (*Evening News*, 21 February 1927:1, 30; *Philadelphia Inquirer*, 17 September 1927:24; PJM 2020a).

The pool would be effected by the construction of more than 210 miles of 220 kV transmission lines in a ring (Figure 1). These lines would connect at terminal substations located at Plymouth Meeting and Siegfried in Pennsylvania and Roseland, New Jersey. Each of the partners would build two transmission lines to meet the lines of their partners. PECO's lines would run from the 40-acre Plymouth Meeting substation—reportedly the world's largest—to the PP&L substation at Siegfried and to the Delaware River across from Lambertville, New Jersey, where it would connect with PSE&G (Van Steen and Hurlbut 2011:50-51, 53; Beamish 1927:7; PSE&G 2014:41-42).

It was decided that all electric power generated by Conowingo would run first to the Plymouth Meeting substation for distribution into the wider pool. The area between Conowingo and Plymouth Meeting was largely undeveloped farmland, making it far easier and less expensive to obtain right-of-way for a transmission line than it would have been in developed areas. In addition to supplying the Interconnection, Plymouth Meeting also (and perhaps more importantly at the time for PECO) would serve as the connection between the Conowingo station and Philadelphia. Through 1927, Day & Zimmerman built the twin rows of towers along a roughly 60-mile-long, 315-foot-wide right-of-way from Conowingo to Plymouth Meeting. Though there are presently tie-ins to the Peach Bottom nuclear power station, PP&L, and various substations, as built the line was a straight run from Conowingo to Plymouth Meeting (Geasey 1995:142; PECO 1928:2).

At Plymouth Meeting, the 220 kV power from both Conowingo and the connections to PP&L and PSE&G would be stepped down to 66 kV for transmission to Philadelphia (or alternately, the power produced in PECO's Philadelphia stations would be stepped up to 220 kV). To transmit the power to and from the new Westmoreland Substation at Westmoreland Street and Hunting Park Avenue in North Philadelphia, PECO struck a deal with the Reading Company which would allow the erection of 66 kV transmission lines along the Reading's railroad line paralleling the Schuylkill River. In exchange, the Reading could use the transmission towers to string its own catenary wires to electrify its commuter line (Wainwright 1961:181-182; PECO 1928:2).

PECO's sectors of the Interconnection began going online in 1928, with the Conowingo to Plymouth Meeting and the Plymouth Meeting to Siegfried sectors placed online that year. PECO's contributions to the Interconnection included pioneering the use of a master clock and state-of-the-art recording systems to regulate the power flow across the system. Prior to the Conowingo and Interconnection projects, PECO contracted with Leeds & Northrup to develop and manufacture

“an open-scale frequency recorder with a graphic record of instantaneous frequency with deviations from 60 Hz, more readable and with a higher accuracy” than was available from the vibrating reed type of frequency indicators in use at the time. To meet the request, Leeds & Northrup Company manufactured the “initial impedance bridge frequency recorder” first installed on the PECO system operations center in 1923. As a result, “the instrument became the standard for monitoring power system frequency throughout the world.” PECO is credited as “the first company to display before its system operators’ graphic recorders of the output of its four generating stations, total system generation and system frequency.” The standards set by PECO were not exceeded for many years (Van Steen and Hurlbut 2011:55).

In the ensuing decades after the PNJ Interconnection went online (the last of its original sectors began operation in 1932), the power pool expanded. It was renamed PJM Interconnection when Baltimore Gas & Electric and General Public Utilities (GPU) joined in 1956. Other utility companies continued to join the pool through the remainder of the 20th century and into the 21st, and at present the pool covers all or part of 12 states and the District of Columbia (PJM 2020a; PJM 2020b).

Significance of the PNJ Interconnection; Conowingo to Plymouth Meeting Transmission Line:

The significance of the PNJ Interconnection is well-documented in the previous HRSF for the Wallenpaupack to Siegfried Transmission Line. Aspects of its significance include:

- At the time of formation, it was the largest cooperative power pool in the U.S. and the first successful integration of large-scale electric utilities while retaining separate corporate ownerships.
- It advanced the design of transmission lines and structures to resist sleeting and other weather-related stresses, and successfully transmit high-voltage electricity over long distances.
- Standardized construction methods developed within the overall system allowed for transmission towers to be easily constructed and adapted for their specific locations.
- The system's innovations aided in developing design solutions to other environmental problems that affect transmission reliability, such as lightning impacts.
- The advent of the PNJ Interconnection "was a significant step in the extension of reliable electric supply to Pennsylvania and New Jersey and balanced the service needs of the region's rural, industrial, urban, and suburban areas. The contractual interconnection of the electric systems of these three major utility companies – PECO, PSE&G, and PP&L – resulted in an efficient means of electrical supply and distribution that benefitted all three companies by ensuring that sufficient electrical supply was available during peak load times" (Van Steen and Hurlbut 2011:57).
- The PNJ Interconnection's cooperative structure allowed its partners to weather market changes and increasing demand, and became a model for future cooperative agreements among utilities (Van Steen and Hurlbut 2011:57-68).

The PNJ Interconnection resource was recommended eligible under Criterion A in the areas of Engineering and Industry "as segments of the 1928 PNJ Interconnection of the PSE&G, PPL&L, and PECO transmission lines. The PNJ Interconnection – Wallenpaupack to Siegfried Line and the Bushkill to Roseland Line is significant on a national level (in both New Jersey and Pennsylvania) with a period of significance from the inception of the interconnection agreement in 1927 through the expansion of the interconnection into the Pennsylvania-New Jersey-Maryland Interconnection (PJM) in 1956" (Van Steen and Hurlbut 2011:58). It was also recommended eligible under Criterion C "as a significant engineering achievement of the late 1920s and specifically as an important advancement in the field of electrical utilities" (Van Steen and Hurlbut 2011:59). The PA SHPO concurred with these recommendations (MacDonald 2011).

The Conowingo to Plymouth Meeting sector of the PNJ Interconnection has not been previously identified or documented, and this evaluation focuses on this PECO-built sector. The Conowingo to Plymouth Meeting Transmission Line was critical to the completion and functionality of the overall PNJ Interconnection, and over the past 90+ years, it has continued to fulfill its original role in feeding power to a grid that has continued to grow over time. The addition of PECO and Conowingo to the proposed Interconnection was a key part of the cooperative pool's functionality and ability to succeed in providing power at a large multistate scale. As the largest hydroelectric plant in the system, and the second-largest in the country at the time of completion, the Conowingo Hydroelectric Plant was able to provide more power for the system than its original counterpart plants. As such, the transmission line from Conowingo to Plymouth Meeting was highly critical infrastructure, with much of the PNJ Interconnection system's success relying on its efficacy. As with the Conowingo Hydroelectric Plant, the Plymouth Meeting Substation was among the largest substations in the world at that time, and from its inception has formed a critical link for PECO and the PNJ Interconnection, as it distributes power into both the long-distance PNJ Interconnection and more locally to the City of Philadelphia. Connecting plant and substation, the Conowingo to Plymouth Meeting Transmission Line has been a vital link in both the PNJ Interconnection and the regional power grid since it went online in 1928. Designed and built by Day & Zimmerman, the transmission line incorporated the innovative engineering pioneered by the PNJ Interconnection's cooperating utilities, with conductors and towers that have stood the test of time. Innovations pioneered specifically by PECO, including frequency recorders, were utilized on this transmission line and elsewhere in the PNJ Interconnection. Overall, the Conowingo to Plymouth Meeting Transmission Line contributed greatly to the success of the PNJ Interconnection.

National Register of Historic Places Evaluation:

This evaluation specifically covers the subject portion of the Conowingo to Plymouth Meeting Transmission Line, not the overall line between Conowingo and Plymouth Meeting. The subject portion of the PNJ Interconnection; Conowingo to Plymouth Meeting Transmission Line retains integrity of design, materials, workmanship, feeling, and association. As an intact and important part of the original PNJ Interconnection, the subject portion of the PNJ Interconnection; Conowingo to Plymouth Meeting Transmission Line is recommended eligible for the NRHP as contributing to the previously recorded NRHP-eligible sectors of the PNJ Interconnection in Pennsylvania and New Jersey. The 14 towers and one access road within the subject resource are all contributing structures.

As with the other sectors, the subject portion of the PNJ Interconnection; Conowingo to Plymouth Meeting Transmission Line has significance under Criterion A in the areas of Engineering and Industry, as it forms part of an engineering innovation with wide-ranging impacts to the development of electrical power distribution grids, and was an integral part of a landmark cooperative agreement creating a power-pool partnership between three regional utilities. Given its clear association with the system and its success, this resource contributes to the overall PNJ Interconnection under Criterion A.

This resource also has significance under Criterion C as a cluster of intact typical transmission structures dating from the line's original construction, that lack individual distinction but collectively represent the innovation in engineering that made successful long-distance high-voltage transmission and creation of a power pool possible. The extant structures comprising the resource are standard types within the overall system, and representative of the innovative transmission infrastructure created by PECO and its PNJ Interconnection partners to resist weather-related stressors that affected earlier power transmission systems. Since the 14 structures date from within the period of significance and retain integrity, they contribute to the overall PNJ Interconnection under Criterion C.

The subject portion of the PNJ Interconnection; Conowingo to Plymouth Meeting Transmission Line does not appear to have significance under Criterion B, as research did not identify its association with particular individuals significant in our past. The resource also does not appear to have significance under Criterion D; given the nature of the resource and its structures, the standardized materials and construction methods used in construction, and the general lack of human activity surrounding the structures post-construction, it is unlikely to yield important information in history or prehistory.

The period of significance for the subject sector is 1927 to 1956, in keeping with the period of significance for the overall PNJ Interconnection resource. As previously discussed, the recommended boundary includes PECO's right-of-way and all transmission structures standing within it between the NHSL and the west end of Hansen Access Road, terminating immediately west of tower pair 4/1.

Historic Images (Item 37)

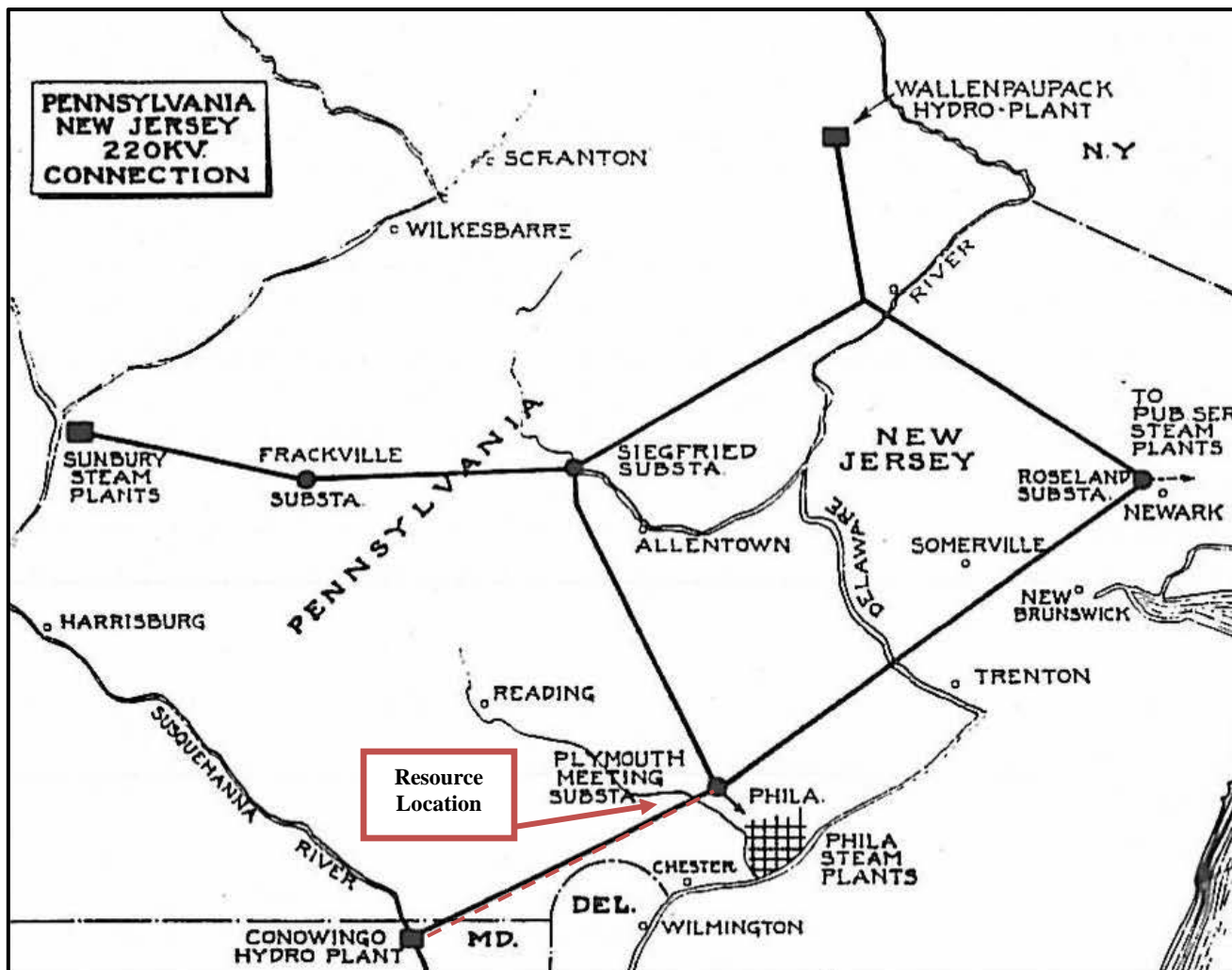


Figure 1. PNJ Interconnection Historical Map of Original System (Van Steen and McLane 2011:41). Markup shows location of PNJ Interconnection; Conowingo to Plymouth Meeting Transmission Line.

Historic Images (Item 37)

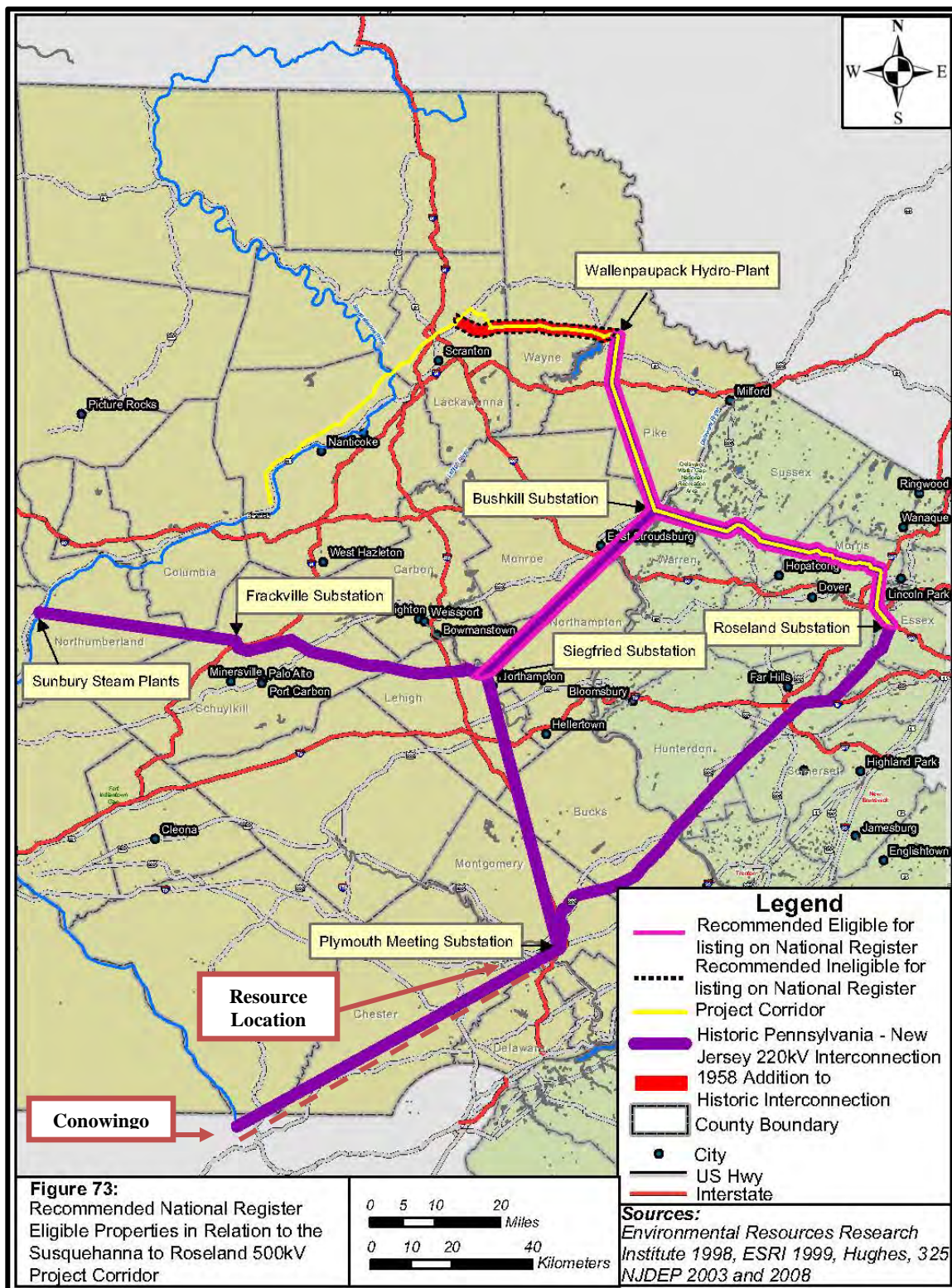


Figure 2. PNJ Interconnection Map showing NRHP-eligible sectors, Wallenpaupack to Siegfried and Bushkill to Roseland (Key No. 156601) (Van Steen and McLane 2011:167).

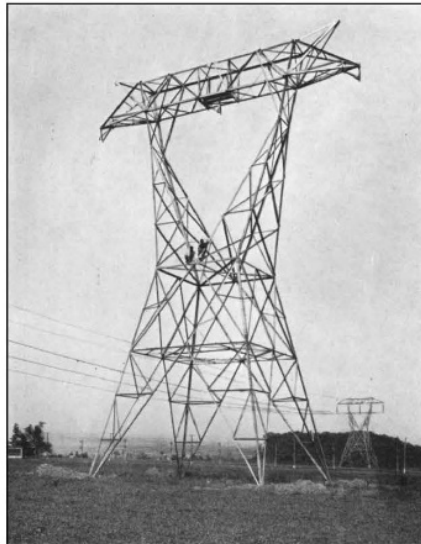


Figure 19: Standard (Historic) Tower Plymouth Meeting to Roseland Line. *Source: Funk 1931.*

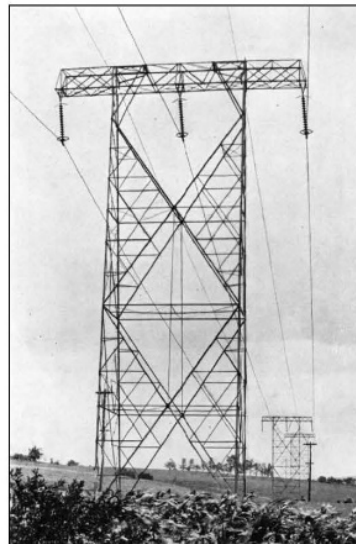


Figure 20: Standard (Historic) Tower Plymouth Meeting to Siegfried Line. *Source: Funk 1931.*

Figure 3. Historic photographs of standard original PECO tower designs under construction in PECO's Plymouth Meeting to Roseland and Plymouth Meeting to Siegfried sectors, ca. 1927 (Van Steen and McLane 2011:50).

Photographs (Item 37)

Photograph 1. PNJ Interconnection; Conowingo to Plymouth Meeting Transmission Line. East end of resource; view looking southwest across NHSL from PECO ROW at Crooked Lane.



Photograph 2. View looking northeast from Republic Services property toward easternmost tower pair 2/8.

Photographs (Item 37)

Photograph 3. Transmission corridor looking southwest from Republic Services property toward tower pair 3/1.



Photograph 4. View looking east from Saulin Blvd. vicinity; tower pair 3/1 in foreground.

Photographs (Item 37)

Photograph 5. View looking northeast from Henderson Rd. showing tower pairs 3/1 (front) and 2/5 (at rear).



Photograph 6. Side view of tower pair 3/2 at Henderson Rd., view to south.

Photographs (Item 37)

Photograph 7. View to southwest up steep hill from Henderson Rd.; tower 3/2 at right. Note access road entrance at center.



Photograph 8. Tower pairs 3/4 in foreground and 3/3 in background, view to northeast across the PA Turnpike.

Photographs (Item 37)

Photograph 9. View of west end of resource looking southwest along Hansen Access Rd. above the PA Turnpike.



Photograph 10. View from west end of resource looking northeast across the PA Turnpike.

Photographs (Item 37)



Photograph 11. South tower in 3/5 pair showing oblique view with typical details; view to northeast.

Photographs (Item 37)



Photograph 12. North tower in 3/5 pair showing side view with typical details, view to north.

Photographs (Item 37)

Photograph 13. Upward detail view to northeast of upper part of north tower in 3/5 pair, showing typical arrangement of three conductors with vertical insulator strings, and two grounding wires at top.



Photograph 14. Detail of southwest anchor foot of north tower in 3/5 pair, view to northeast.

Attachment C: Tables

Table 1. Summary of Effects Evaluations for Design Refinements

Resource Name	PA SHPO Key No.	Previous Finding	Current Finding	Justification
<i>Previously Identified Resources</i>				
Pennsylvania Turnpike; Delaware River Extension	155679	No Adverse Effect	No Adverse Effect	Design refinements do not change effects
Philadelphia and Western Railway	128825	No Adverse Effect	No Adverse Effect	Design refinements do not change effects
American Baptist Churches USA Mission Center	203535	No Adverse Effect	No Historic Properties Affected	Land take no longer required
Market Street Elevated Railway Historic District	105499	No Historic Properties Affected	No Historic Properties Affected	Design refinements are not within or in proximity to HD
69th Street Terminal Square Shopping District	156448	No Historic Properties Affected	No Historic Properties Affected	Design refinements are not within or in proximity to HD
<i>Newly Identified Resources</i>				
PNJ Interconnection; Conowingo to Plymouth Meeting Transmission Line	156601	N/A	Adverse Effect	Design refinements result in demolition and replacement of part of resource

Table 2. Results of Effects Evaluation for the Pennsylvania Turnpike: Delaware River Extension (Key No. 155679)

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 Preferred Alternative would provide two new elevated overpasses crossing the PA Turnpike in Upper Merion Township, and elevated track running parallel to the north side of the Turnpike, within the Turnpike right-of-way. In both locations, the Project would be within the NRHP boundary of the eligible Pennsylvania Turnpike: Delaware River Extension
Finding: The proposed undertaking results in a finding of Historic Properties Affected .	

Table 3. Application of Criteria of Adverse Effect for Pennsylvania Turnpike: Delaware River Extension (Key No. 155679)

<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>	
<p>Examples of Adverse Effects (36 CFR 800.5(a)(2))</p>	<p>Evaluation</p>
<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 Preferred Alternative 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.</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 NRHP boundary.</p>
<p>(iii) Removal of the property from its historic location;</p>	<p>The Preferred Alternative 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 Preferred Alternative 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 Preferred Alternative would not change the character of the PA Turnpike's use or affect remaining physical features 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 Preferred Alternative would introduce new visual elements into the PA Turnpike corridor, including two new elevated crossings over the roadway and elevated tracks along the north side of the roadway, within the right-of-way. Potential replacement of PECO transmission towers east of the Turnpike may occur on the hillside north of the highway. 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</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 Preferred Alternative 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>Finding: The proposed undertaking results in a finding of No Adverse Effect on the Pennsylvania Turnpike: Delaware River Extension (Key No. 155679).</p>	

Table 4. Results of Effects Evaluation for Philadelphia and Western Railway: Norristown High Speed Line (Key No. 128825)

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 Preferred Alternative 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 th 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.
Finding: The proposed undertaking results in a finding of Historic Properties Affected .	

Table 5. Application of Criteria of Adverse Effect for Philadelphia and Western Railway: Norristown High Speed Line (Key No. 128825)

<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>	
<p>Examples of Adverse Effects (36 CFR 800.5(a)(2))</p>	<p>Evaluation</p>
<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 Preferred Alternative would add new elements and modify existing elements within the NRHP 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 69th Street Transportation Center, but would 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.</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 Preferred Alternative 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 NRHP boundary.</p>
<p>(iii) Removal of the property from its historic location;</p>	<p>The Preferred Alternative 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 Preferred Alternative 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 Preferred Alternative's new elements, namely track turnoffs in Upper Merion Township and a new track at 69th Street, 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. Although within the Visual Effects APE for the PECO tower replacements in Upper Merion Township, the setting at this location is already highly modernized and changes to the towers would not affect significant historic features within the railroad corridor.</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 Preferred Alternative 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 Preferred Alternative would not result in the transfer, lease, or sale out of Federal control.</p>
<p>Finding: The proposed undertaking results in a finding of No Adverse Effect on the Philadelphia and Western Railway; Norristown High Speed Line (Key No. 128825).</p>	

Table 6. Results of Effects Evaluation for American Baptist Churches USA Mission Center (Key No. 203535)

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 Preferred Alternative will be built on the north side of 1 st Avenue, outside the NRHP boundary for the ABCUSA Mission Center. It will not have direct or indirect impacts on the resource. The previous design plans called for taking of a small strip of land, but the current Preferred Alternative moved the 1 st and Moore station facility northward across 1 st Avenue, so taking of land from ABCUSA is no longer necessary. Therefore, the Project would have no effect on the American Baptist Churches USA Mission Center (Key No. 203535).
Finding: The proposed undertaking results in a finding of No Historic Properties Affected.	

**Table 7. Results of Effects Evaluation for Market Street Elevated Railway Historic District
(Key No. 105499)**

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 Preferred Alternative modifications to the northernmost platform, access stairs, bus loop, and west elevation of the circa-1982 northernmost section of the 69th Street Transportation Center station building would occur in and adjacent to a modern extension of the circa-1909 station building (Philadelphia Transit Co. Building, 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 NRHP boundary of this property.</p> <p>No work would occur within the NRHP 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. Therefore, the Project would have no effect on the Market Street Elevated Railway Historic District (Key No. 105499).</p>
<p>Finding: The proposed undertaking results in a finding of No Historic Properties Affected.</p>	

Table 8. Results of Effects Evaluation for 69th Street Terminal Square Shopping District (Key No. 156448)

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 Preferred Alternative modifications to the northernmost platform, access stairs, bus loop, and west elevation of the northernmost section of the 69th Street Transportation Center station building would occur in and adjacent to a modern extension of the circa-1909 station building (Philadelphia Transit Co. Building, 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 NRHP boundary of this resource, a contributing resource within the historic district.</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. 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 (Key No. 156448).</p>
<p>Finding: The proposed Project results in a finding of No Historic Properties Affected.</p>	

**Table 9. Results of Effects Evaluation for
PNJ Interconnection; Conowingo to Plymouth Meeting Transmission Line
(Key No. 156601)**

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 clearances for proposed elevated guideway between the NHSL and the PA Turnpike under the Preferred Alternative, approximately 4 to 7 contributing steel lattice transmission towers within the NRHP boundary for the resource would need to be replaced with taller monopole structures. Therefore, the proposed Project would have an Effect on the PNJ Interconnection; Conowingo to Plymouth Meeting Transmission Line.
Finding: The proposed undertaking results in a finding of Historic Properties Affected .	

**Table 10. Application of Criteria of Adverse Effect for the PNJ Interconnection;
Conowingo to Plymouth Meeting Transmission Line (Key No. 156601)**

<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>	
<p align="center">Examples of Adverse Effects (36 CFR 800.5(a)(2))</p>	<p align="center">Evaluation</p>
<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>Under the Preferred Alternative, part of the property (approximately 4 to 7 steel lattice transmission towers) within the NRHP boundary would be demolished and replaced.</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>Under the Preferred Alternative, the property would be altered by the removal of 4 to 7 steel lattice transmission towers and replacement with taller monopole structures of modern design. The proposed replacement structures are inconsistent with the Secretary's Standards; in-kind replacement of the towers with taller steel lattice towers is not possible since these structures are no longer built.</p>
<p>(iii) Removal of the property from its historic location;</p>	<p>The Preferred Alternative would not involve removal of the property 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 replacement of the existing towers with visually and structurally different monopoles would not change the character of the property's use, as the transmission line would continue to function as such. However, the Preferred Alternative would change physical features within the property's setting by removing contributing structures.</p>
<p>(v) Introduction of visual, audible, or atmospheric elements that diminish the integrity of the property's significant historic features;</p>	<p>The Preferred Alternative would introduce new visual elements into the surrounding setting. Removing the extant towers and introducing taller and significantly different monopole transmission towers would diminish the integrity of the historic transmission line corridor.</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	The Preferred Alternative would not result in the neglect of the PNJ Interconnection; Conowingo to Plymouth Meeting Transmission Line.
(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.	The PNJ Interconnection; Conowingo to Plymouth Meeting Transmission Line is not under Federal ownership; the Preferred Alternative would not result in the transfer, lease, or sale of the property out of Federal control.
Finding: The proposed undertaking results in a finding of Adverse Effect on the PNJ Interconnection; Conowingo to Plymouth Meeting Transmission Line (Key No. 156601) .	



Pennsylvania State Historic Preservation Office

PENNSYLVANIA HISTORICAL AND MUSEUM COMMISSION

October 30, 2020

Ms. Shauna Haas
Federal Transit Administration
1835 Market Street, Suite 1910
Philadelphia, PA 19103

RE: ER 2013-1006-091-R; FTA: King of Prussia Rail Extension; Upper Merion Township, Montgomery County; Design Refinements – Determination of Effects

Dear Ms. Haas,

Thank you for submitting information concerning the above referenced project. The Pennsylvania State Historic Preservation Office (PA SHPO) reviews projects in accordance with state and federal laws. Section 106 of the National Historic Preservation Act of 1966, and the implementing regulations (36 CFR Part 800) of the Advisory Council on Historic Preservation, is the primary federal legislation. The Environmental Rights amendment, Article 1, Section 27 of the Pennsylvania Constitution and the Pennsylvania History Code, 37 Pa. Cons. Stat. Section 500 et seq. (1988) is the primary state legislation. These laws include consideration of the project's potential effects on both historic and archaeological resources.

Proposed Project

The Federal Transit Administration (FTA) previously completed Section 106 consultation for the above-referenced project in March 2017. PA SHPO concurred with the overall project finding of No Adverse Effect. The overall project is SEPTA's proposed extension of the Norristown High Speed Line to King of Prussia. The proposed design has been refined to include areas and actions not addressed in previous consultation.

Area of Potential Effects

Based on the information received, we concur with the agency's Area of Potential Effects as presented in your submission for both archaeology and above ground resources.

Archaeological Resources

We concur with the findings that no archaeological resources will be affected by the proposed project as refined and that no additional archaeological survey is warranted.

Aboveground Resources

Identification of Historic Properties

One new potential historic property was identified as part of the refined design. Based on the information received and available within our files, we concur with the findings of the agency that the **Pennsylvania-New Jersey (PNJ) Interconnection: Conowingo to Plymouth Meeting Transmission Line** is **Eligible** as part of the overall PNJ Interconnection (Key No. 156601), a portion of which (Wallenpaupack to Siegfried) was determined eligible in 2011. The line is eligible under Criterion A in the areas of Engineering and Industry, as it forms part of an engineering innovation with wide-ranging impacts to the development of electrical power distribution grids and was an integral part of a landmark cooperative agreement creating a power-pool partnership between three regional utilities. The property is also eligible under Criterion C as a linear district of intact typical transmission structures dating from the line's original construction that collectively

represent the innovation in engineering that made successful long-distance, high-voltage transmission and creation of a power pool possible. The period of significance begins in 1927, when the PNJ Interconnection agreement was signed and ends in 1956, when the Baltimore Gas & Electric and General Public Utilities joined the utility pool. The boundary of the linear district includes the right-of-way, or 350' on center from line. While we agree that the portion within the APE retains integrity, it is likely that the boundary extends beyond the APE to possibly include the entire line itself.

Determination of Effect

Based on the information provided and available within our files, we concur with the agency finding that the proposed project, including the revised design, will result in No Adverse Effect to the following properties: Pennsylvania Turnpike: Delaware River Extension (Key No. 155679) and the Philadelphia and Western Railroad (Key No. 128825). We concur that the proposed project as refined will have No Effect on the Market Street Elevated Railway Historic District (Key No. 105499), the 69th Street Terminal Square Shopping District (Key No. 156448), and the American Baptist Churches USA Mission Center (Key No. 203535).

With regards to the PNJ Interconnection (Key No. 156601), we concur with the overall finding of the agency that the project as refined will result in an **Adverse Effect** to historic properties due to the necessity to physically remove at least four and up to seven original lattice towers that are contributing resources to the linear historic district. To comply with the regulations of the Advisory Council on Historic Preservation, the federal agency must follow the procedures outlined in 36 CFR 800.6 when the effect is adverse. Thank you for providing the additional information regarding consideration of alternatives that avoid or minimize effects to historic properties as well as documentation of consulting party coordination. The federal agency will need to notify the Advisory Council of the effect finding and continue to consult with the PA SHPO and other consulting parties, as participating, to seek ways to avoid, minimize, and/or mitigate the adverse effects on the historic property.

Resolution of Adverse Effects

We generally agree with the proposed mitigation as outlined in the draft Memorandum of Agreement provided on October 23, 2020. As proposed, SEPTA shall prepare GIS mapping of the portion of the PNJ Interconnection; Conowingo to Plymouth Meeting Transmission Line in Pennsylvania for submittal to PA SHPO and integration into PA SHPO's Cultural Resources Geographic Information System (CRGIS) and/or any successor GIS systems. Mapping shall be a boundary shape and cover the area of the resource between the Commonwealth of Pennsylvania border with Maryland and PECO's Plymouth Meeting Substation in Plymouth Meeting, Pennsylvania. The mapping shall be provided as ArcGIS shapefiles and shall be prepared and submitted in compliance with PA SHPO guidelines for GIS deliverables. This mapping will be an addendum to the resource as mapped in the previous Historic Resources Survey Form (HRSF) for the PNJ Interconnection; Conowingo to Plymouth Meeting Transmission Line (Key No. 156601).

In addition to the mapping proposed, PA SHPO offers for consideration an inventory of potential contributing resources for the section of line covered by the aforementioned mapping (the Commonwealth of Pennsylvania border with Maryland and PECO's Plymouth Meeting Substation) as part of this effort. This would include substations and lattice towers as well as any other supporting structures identified. The inventory would be submitted as an addendum to the HRSF in accordance with current PA SHPO standards and could be provided in table format to include name, type, estimated construction date, and photographs. Photographic documentation could include individual photographs for resources such as substations, and representative

photographs for repetitive features, such as the lattice towers. In addition, as the mapping was somewhat difficult to discern in the HRSF provided for the PNJ Interconnection (Figure 2 of the HRSF submitted), a revised map illustrating the area documented (between the Pennsylvania/Maryland border and the Plymouth Meeting Substation) on current aerial mapping should be provided.

Please note, however, that concurrence with this proposed mitigation should not preclude consideration of any other mitigation options proposed by other consulting parties, if presented.

If you need further information concerning this review and/or future consultation, please contact Emma Diehl at emdiehl@pa.gov or (717) 787-9121.

Sincerely,

A handwritten signature in black ink, appearing to read "D. McLearen", written in a cursive style.

Douglas C. McLearen, Chief
Division of Environmental Review



**Advisory Council on Historic Preservation
Electronic Section 106 Documentation Submittal System (e106) Form
MS Word format**

Send to: *e106@achp.gov*

Please review the instructions at www.achp.gov/e106-email-form prior to completing this form. Questions about whether to use the e106 form should be directed to the assigned ACHP staff member in the Office of Federal Agency Programs.

I. Basic information

1. Purpose of notification. Indicate whether this documentation is to:

- ☒ Notify the ACHP of a finding that an undertaking may adversely affect historic properties
- ☐ Invite the ACHP to participate in a Section 106 consultation
- ☐ Propose to develop a project Programmatic Agreement (project PA) for complex or multiple undertakings in accordance with 36 C.F.R. 800.14(b)(3)
- ☐ Supply additional documentation for a case already entered into the ACHP record system
- ☐ File an executed MOA or PA with the ACHP in accordance with 800.6(b)(iv) (where the ACHP did not participate in consultation)
- ☐ Other, please describe

[Click here to enter text.](#)

2. ACHP Project Number (If the ACHP was previously notified of the undertaking and an ACHP Project Number has been provided, enter project number here and skip to Item 7 below): Not previously notified.

3. Name of federal agency (If multiple agencies, list them all and indicate whether one is the lead agency):

Federal Transit Administration (FTA)

4. Name of undertaking/project (Include project/permit/application number if applicable):

King of Prussia Rail Extension Project

5. Location of undertaking (Indicate city(s), county(s), state(s), land ownership, and whether it would occur on or affect historic properties located on tribal lands):

Upper Merion Township, Montgomery County, PA and Upper Darby Township, Delaware County, PA. Land ownership is a mixture of public (state highway and transit agency) and private entities. The Project will not occur on or affect historic properties located on tribal lands.

ADVISORY COUNCIL ON HISTORIC PRESERVATION

401 F Street NW, Suite 308 □ Washington, DC 20001-2637

Phone: 202-517-0200 Fax: 202-517-6381 achp@achp.gov www.achp.gov

6. Name and title of federal agency official and contact person for this undertaking, including email address and phone number:

Timothy Lidiak, (215) 656-7084, timothy.lidiak@dot.gov

II. Information on the Undertaking*

7. Describe the undertaking and nature of federal involvement (if multiple federal agencies are involved, specify involvement of each):

The undertaking is construction of a new rail extension by the Southeastern Pennsylvania Transportation Authority (SEPTA) that would provide public transit to King of Prussia, a densely developed area in Upper Merion Township, Montgomery County, PA (the Project). The Project will provide a new rail extension that branches off the west side of SEPTA's existing Norristown High Speed Line (NHSL), which currently provides transit service between Norristown in Montgomery County and Upper Darby in Delaware County. The Project guideway will be elevated on aerial structures and embankments, will have five station stops including two park-and-ride facilities, and will have its western terminus at First Avenue and Moore Road. The rail extension will connect King of Prussia to the existing regional transportation centers in Norristown (Norristown Transportation Center) and Upper Darby (69th Street Transportation Center). SEPTA is seeking Federal funding from FTA.

8. Describe the Area of Potential Effects (APE):

The APE for archaeology is defined as the proposed limits of temporary and permanent land disturbance. The APE for historic architecture encompasses all areas where anticipated construction and staging activities have the potential to directly or indirectly affect historic architectural properties, including 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) and resources from which the Project may be visible and/or has the potential to create a visual impact to the integrity of a listed or eligible resource. The APEs are shown in Appendix A.

The APE for historic architectural resources in Upper Merion Township extends 500 feet on either side of the centerline of the proposed guideway alignment between the existing NHSL and the western terminus along First Avenue. The APE is wider in limited areas to take in the entirety of land parcels requiring acquisition for the Project at the proposed Henderson Road and First & Moore stations. The APE boundary encompasses proposed Project infrastructure, including the guideway, stations, stormwater facilities, access points, and park-and-ride facilities, as well as temporary land uses during construction.

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. The APE for the 69th Street Transportation Center improvements is based upon the relatively low profile of the work proposed. The APE at the 69th Street Transportation Center is within existing SEPTA property and includes the portion of the existing NHSL. The Project will extend a short section of existing track from near the end of the existing station platform to the station building. SEPTA will rebuild the existing platform to serve the track, and will make passenger circulation improvements to the interior of the station building. Due to topography and the height/density of existing buildings in proximity to the Project work area, the Project has limited or no visibility from the surrounding area.

9. Describe steps taken to identify historic properties:

Historic Architecture

Background research on previously identified properties and a reconnaissance historic architecture survey of multiple project route alternatives were undertaken in 2015. After a Locally Preferred Alternative was identified, intensive-level historic architecture survey was undertaken in 2016, resulting in a Determination of Eligibility Report dated July 2016. Historic properties were identified through background research, which included consulting the PA SHPO's cultural resources files and online GIS system, review of historic aerial photographs, and research at local repositories. There were four previously identified properties in the APE that were previously determined eligible for the NRHP, and no previously identified properties that were NRHP-listed. Among the remaining previously identified properties in the APE, all but one had been determined not eligible for the NRHP. The initial survey identified and evaluated 10 new properties, and evaluated the one previously identified property that had not been evaluated for NRHP eligibility before. Consulting party coordination and public meetings did not identify any additional properties. Of the 11 surveyed properties, one newly identified property was recommended eligible for the NRHP. The PA SHPO concurred with the NRHP evaluations on September 26, 2016 (Appendix B).

Section 106 consultation was reopened in 2020 due to design changes, resulting in identification of one new historic resource through consultation with PA SHPO. The PA SHPO concurred with the identification efforts and FTA's findings on October 30, 2020 (Appendix B).

Archaeology

A Phase IA archaeology survey was undertaken in 2016, culminating in a report dated July 29, 2016. The survey findings stated that the APE for archaeology has been subjected to an extensive amount of prior grading, development, and other types of ground disturbance; as a result, additional archaeological investigation of the APE for archaeology was not recommended. The SHPO concurred with FTA's findings on December 15, 2016 (Appendix B). Upon reopening consultation in 2020, archaeologists examined the modified APE to determine archaeological sensitivity and probability of encountering intact belowground resources. Based on the comprehensive nature of prior earthmoving activities, archaeologists concluded that the modified APE for archaeology has a low sensitivity for prehistoric and historic archaeological resources. FTA determined that the findings of the Phase 1A Archaeological Survey apply to the modified APE for archaeology; additional evaluation of the modified APE for archaeology is not necessary. The PA SHPO concurred with this finding on October 30, 2020 (Appendix B).

10. Describe the historic property (or properties) and any National Historic Landmarks within the APE (or attach documentation or provide specific link to this information):

There are six NRHP-eligible historic properties within the Project APE:

1. The Pennsylvania Turnpike: Delaware River Extension (PA SHPO Key No. 155879; <https://gis.penndot.gov/CRGIS/Application/ASPNET/Report/Report.aspx?R=108&T=KEYNO&I=155879>);
2. The Philadelphia and Western Railway (NHSL) (PA SHPO Key No. 128825; <https://gis.penndot.gov/CRGIS/Application/ASPNET/Report/Report.aspx?R=108&T=KEYNO&I=128825>);

3. The American Baptist Churches USA Mission Center (PA SHPO Key No. 203535; <https://gis.penndot.gov/CRGIS/Application/ASPNET/Report/Report.aspx?R=108&T=KEYNO&I=203535>); and
4. The Market Street Elevated Railway Historic District (PA SHPO Key No. 105499; <https://gis.penndot.gov/CRGIS/Application/ASPNET/Report/Report.aspx?R=108&T=KEYNO&I=105499>); and
5. The 69th Street Terminal Square Shopping District (PA SHPO Key No. 156448; <https://gis.penndot.gov/CRGIS/Application/ASPNET/Report/Report.aspx?R=108&T=KEYNO&I=156448>); and
6. The PNJ Interconnection; Conowingo to Plymouth Meeting Transmission Line (PA Key No. 156601; included as Attachment B in the Section 106 Package (Appendix C));

There are no NRHP-listed or National Historic Landmark properties within the APE. Of the six historic properties, five were identified prior to or during the 2016 consultation.

The sixth historic property, the PNJ Interconnection; Conowingo to Plymouth Meeting Transmission Line, was identified during the 2020 consultation. The PNJ Interconnection, constructed ca. 1926-1932, was a 210-mile ring-shaped interstate high-voltage transmission system that revolutionized electric power distribution in the U.S., both physically and organizationally. Segments of the system lying in New Jersey and Northeastern Pennsylvania were previously determined NRHP-eligible in 2011 (PA SHPO Key No. 156601; <https://gis.penndot.gov/CRGIS/Application/ASPNET/Report/Report.aspx?R=108&T=KEYNO&I=156601>). The portion of the system that crosses the APE of the Project is part of a 60-mile corridor between the Conowingo Hydroelectric Station and the Plymouth Meeting Substation that contributes to the larger eligible PNJ Interconnection. It is significant under NRHP Criterion A in the areas of Engineering and Industry, as it forms part of an engineering innovation with wide-ranging impacts to the development of electrical power distribution grids. It is also significant under Criterion C as a cluster of intact typical transmission structures dating from the line's original construction that lack individual distinction but collectively represent the innovation in engineering that made successful long-distance high-voltage transmission possible. A Pennsylvania Historic Resource Survey Form (HRSF), containing detailed information about the PNJ Interconnection; Conowingo to Plymouth Meeting Transmission Line, is included as Attachment B in the Section 106 Package (Appendix C). The HRSF includes photographs and a site plan for the resource.

11. Describe the undertaking's effects on historic properties:

The Project will have **no adverse effect** on the Pennsylvania Turnpike: Delaware River Extension (Key No. 155879) and the Philadelphia and Western Railway (NHSL) (Key No. 128825). The Project resulted in a finding of **no historic properties affected** for the American Baptist Churches USA Mission Center (Key No. 203535), the Market Street Elevated Railway Historic District (Key No. 105499), and 69th Street Terminal Square Shopping District (Key No. 156448). The Project will have an **adverse effect** on the PNJ Interconnection; Conowingo to Plymouth Meeting Transmission Line (PA Key No. 156601). Tables identifying the effects findings are included as Attachment C in the Section 106 Package (Appendix C of this document). The PA SHPO concurred with the updated effects findings, including the adverse effect to the PNJ Interconnection; Conowingo to Plymouth Meeting Transmission Line on October 30, 2020 (Appendix B).

12. Explain how this undertaking would adversely affect historic properties (include information on any conditions or future actions known to date to avoid, minimize, or mitigate adverse effects):

The portion of the PNJ Interconnection in the APE has seven pairs of steel lattice towers (approximately 65 to 85 feet tall) that carry the electric conductor cables (circuits) along the PECO transmission corridor.

SEPTA's engineering study for the Project identified the need to replace at least four of the towers at the eastern end of the resource to address potentially insufficient vertical clearance between the proposed track and the electric circuits. At least four towers coded in red in Figure 1 of Appendix A will be replaced, while the three towers coded in yellow in Figure 1 of Appendix A may also require replacement, depending on further study during subsequent Project design. SEPTA determined that adequate vertical clearance cannot be achieved by changing the elevation of the track. Alternatives analyzed are further discussed in the consultation materials in Appendix C. The towers will need to be replaced with taller monopole towers in order to raise the electric circuits to a sufficient height for the Project to have sufficient clearance beneath them. Monopoles have different spacing requirements than the existing steel lattice towers; as such, the number and locations of monopoles used as replacement structures may differ from the current number and locations of the steel lattice towers. PECO will be responsible for the design of the tower replacement that is required to implement the Project, and SEPTA will continue to coordinate with PECO during subsequent Project design.

The Project will result in an adverse effect to the PNJ Interconnection because the Project will physically remove towers that are contributing elements to the resource, thereby diminishing the historic integrity of the historic property. The towers will be replaced with new monopoles that are of a greater height and a different overall design. See Attachment C in the Section 106 Package (Appendix C of this document). The PA SHPO concurred with the finding of adverse effect on October 30, 2020.

SEPTA and FTA are preparing a Memorandum of Agreement with PA SHPO, which will include activities to mitigate the adverse effects resulting from the Project. To date, PA SHPO, FTA and SEPTA have discussed a potential mitigation measure as follows: SEPTA shall prepare GIS mapping of the entire Conowingo to Plymouth Meeting Transmission Line portion of the resource for submittal to PA SHPO and integration into PA SHPO's Cultural Resources Geographic Information System (CRGIS) and/or any successor GIS systems. Mapping shall be a boundary shape and cover the area between PECO's Plymouth Meeting Substation in Plymouth Meeting, Pennsylvania, and the Maryland border. The mapping shall be provided as ArcGIS shapefiles and shall be prepared and submitted in compliance with PA SHPO guidelines for GIS deliverables. This mapping will be an addendum to the resource as mapped in the previous HRSF for the PNJ Interconnection; Conowingo to Plymouth Meeting Transmission Line (Key No. 156601).

13. Provide copies or summaries of the views provided to date by any consulting parties, Indian tribes or Native Hawai'ian organizations, or the public, including any correspondence from the SHPO and/or THPO.

A Section 106 consulting parties meeting for the King of Prussia Rail Extension project was held by FTA and SEPTA on September 8, 2016. The Project's cultural resources consultants presented the draft NRHP eligibility surveys, including descriptions and maps of the above-ground and below-ground APEs, the identified historic resources, and the assessment of low sensitivity for archaeology. Consulting party comments during the meeting included questions about the project and its visual effects, whether Valley Forge National Historical Park was part of the consultation, and letting the consultants know that a 1991 survey of Delaware County was available. No comments were received on the historic architecture or archaeological evaluations. Copies of the draft Section 106 findings were provided to the PA SHPO and the consulting parties listed in Appendix D. The consulting parties that responded include the Montgomery County Planning Commission, the Chester County Historic Preservation Network, the Delaware Nation, and the Stockbridge-Munsee Community of Mohican Indians. The Montgomery County Planning Commission and the Chester County Historic Preservation Network stated that they had no comments. The Delaware Nation and the Stockbridge-Munsee Community of Mohican Indians both

stated that they had no concerns about the project. Please see Appendix B for the meeting minutes and comments received to date from consulting parties.

Section 106 was reopened for the project in a letter dated October 16, 2020 from FTA to PA SHPO and the consulting parties that agreed to participate, as well as PECO as a newly identified potential consulting party. PA SHPO responded on October 30, 2020, concurring with FTA's findings and suggesting additional mitigation measures; no other parties responded with comments.

III. Additional Information

14. Please indicate the status of any consultation that has occurred to date, including whether there are any unresolved concerns or issues the ACHP should know about in deciding whether to participate in consultation. Providing a list of consulting parties, including email addresses and phone numbers if known, can facilitate the ACHP's review response.

FTA and SEPTA invited and have been coordinating with consulting parties to the Section 106 process since the initial phase of consultation in 2016. In 2020, FTA and SEPTA re-engaged the consulting parties in the Section 106 process by copying the parties on Project documentation regarding the modified APE and the PNJ Interconnection; Conowingo to Plymouth Meeting Transmission Line (see above section). Appendix D includes a list of all parties invited to consult under Section 106 with their contact information, as well as an indication of whether or not they agreed to participate as consulting parties.

15 Does your agency have a website or website link where the interested public can find out about this project and/or provide comments? Please provide relevant links:

Yes, <https://www.kingofprussiarail.com/>

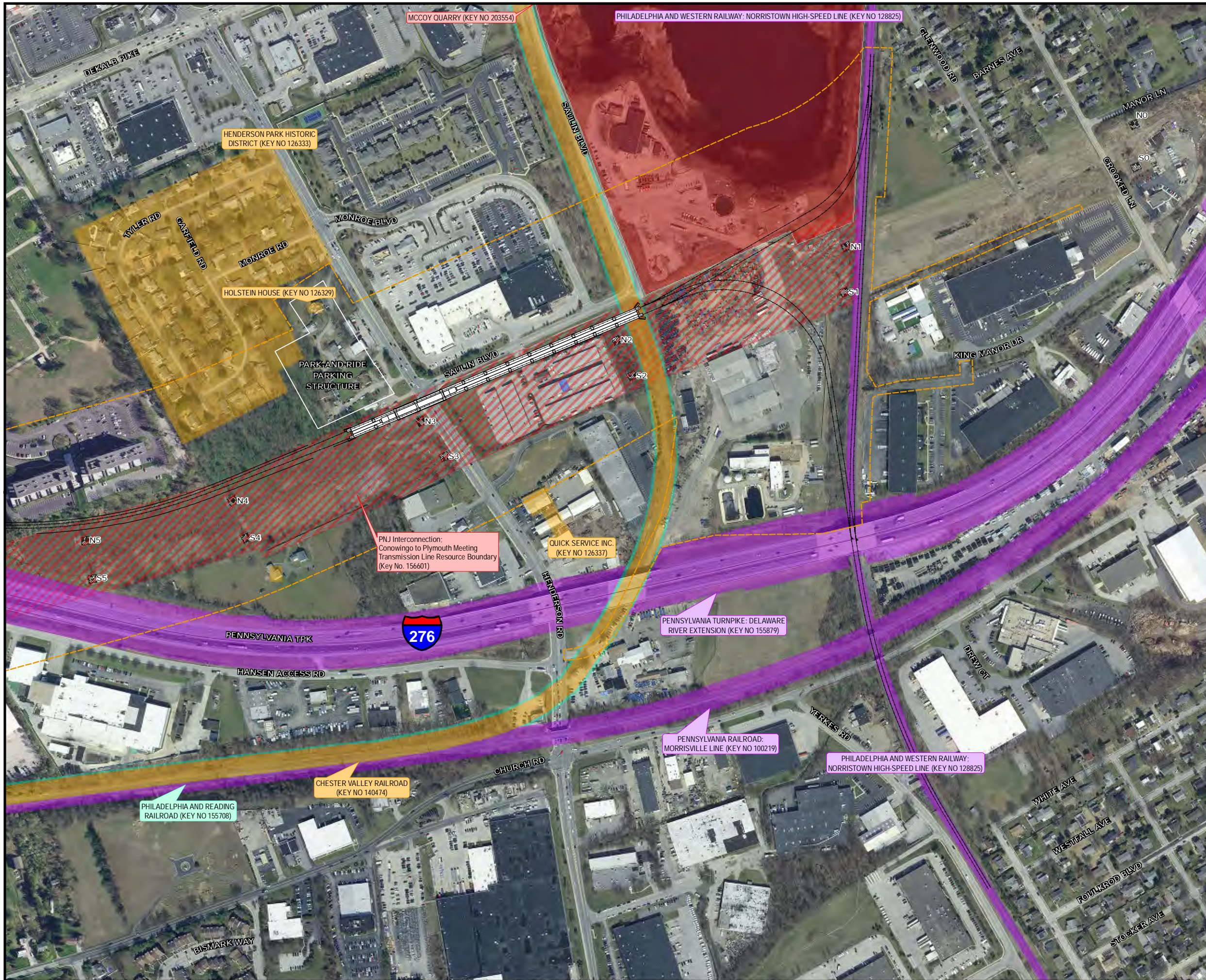
16. Is this undertaking considered a "major" or "covered" project listed on the Federal Infrastructure Projects Permitting Dashboard? If so, please provide the link:

Yes, <https://www.permits.performance.gov/permitting-projects/king-prussia-norristown-extension>

The following are attached to this form (check all that apply):

- ☒ Maps, photographs, drawings, and/or plans (Appendix A)
- ☒ Section 106 consultation correspondence (Appendix B)
- ☒ Additional historic property information (Appendix C)
- ☒ Consulting party list with known contact information (Appendix D)
- ☐ Other: Click here to enter text.

Appendix A: Figures



Preferred Alternative: Sheet: 1 of 4
 KOP Rail FEIS

Historic Architectural Resource

Previously Identified

- Listed/Eligible
- Not Eligible
- Undetermined

Evaluated & Recommended

- Not Eligible
- Eligible
- Potentially Eligible

- Modified APE for Historic Architecture

Proposed Improvements

- Aerial Structure
- PECO Tower
- Other Improvements
- Track Alignment

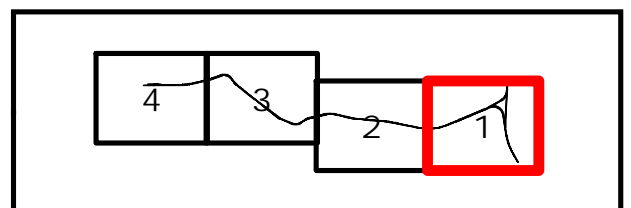
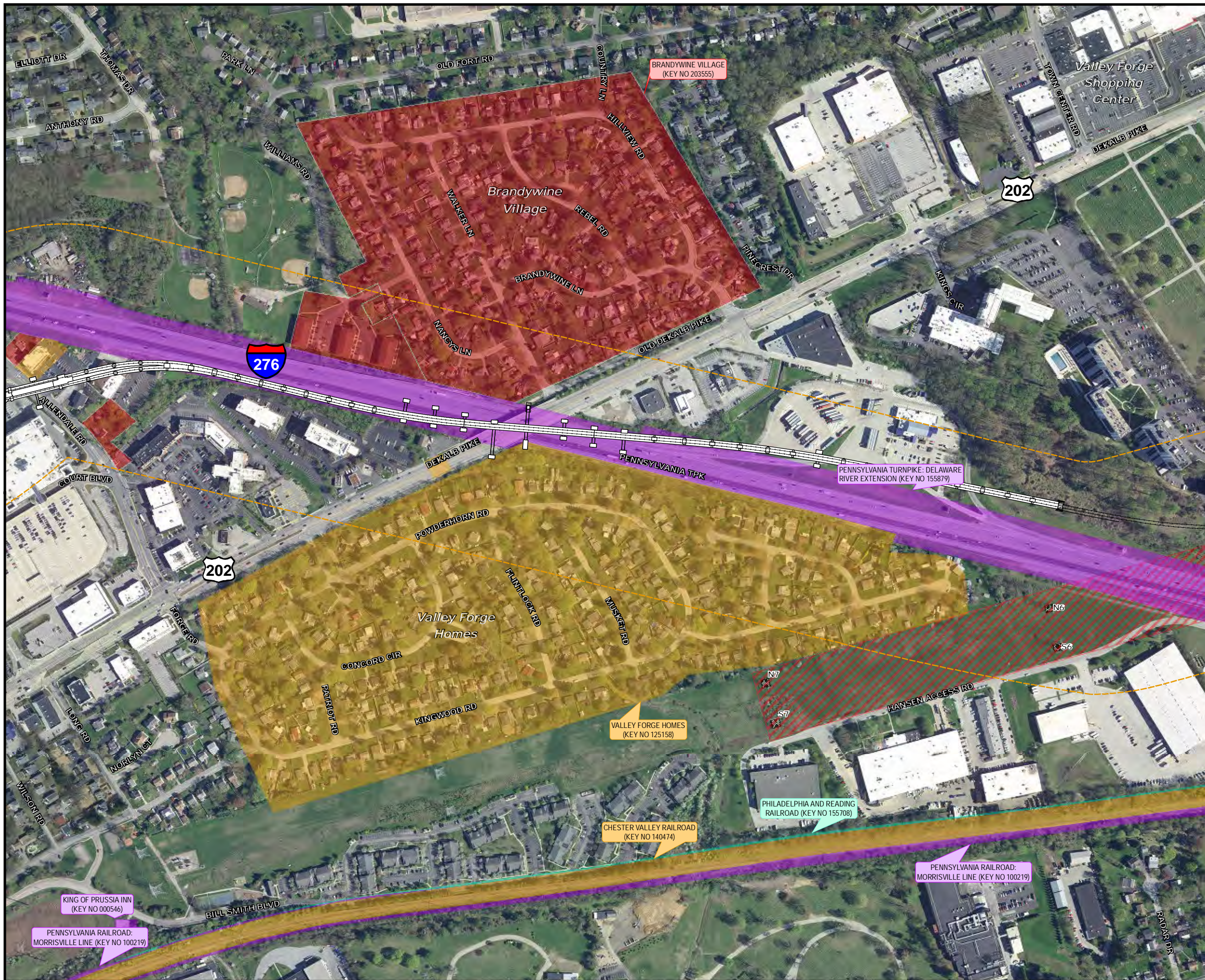


Figure 1a. KOP Rail Project: Preferred Alternative Plans.



Historic Architectural Resource

Previously Identified

- Listed/Eligible
- Not Eligible
- Undetermined

Evaluated & Recommended

- Not Eligible
- Eligible
- Potentially Eligible

Modified APE for Historic Architecture

Proposed Improvements

- Aerial Structure
- PECO Tower
- Other Improvements
- Track Alignment

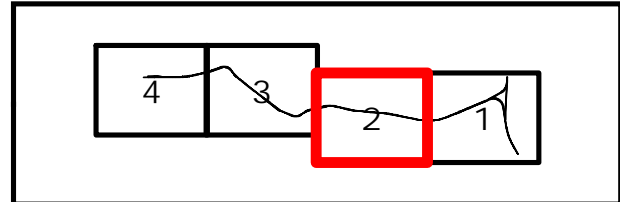
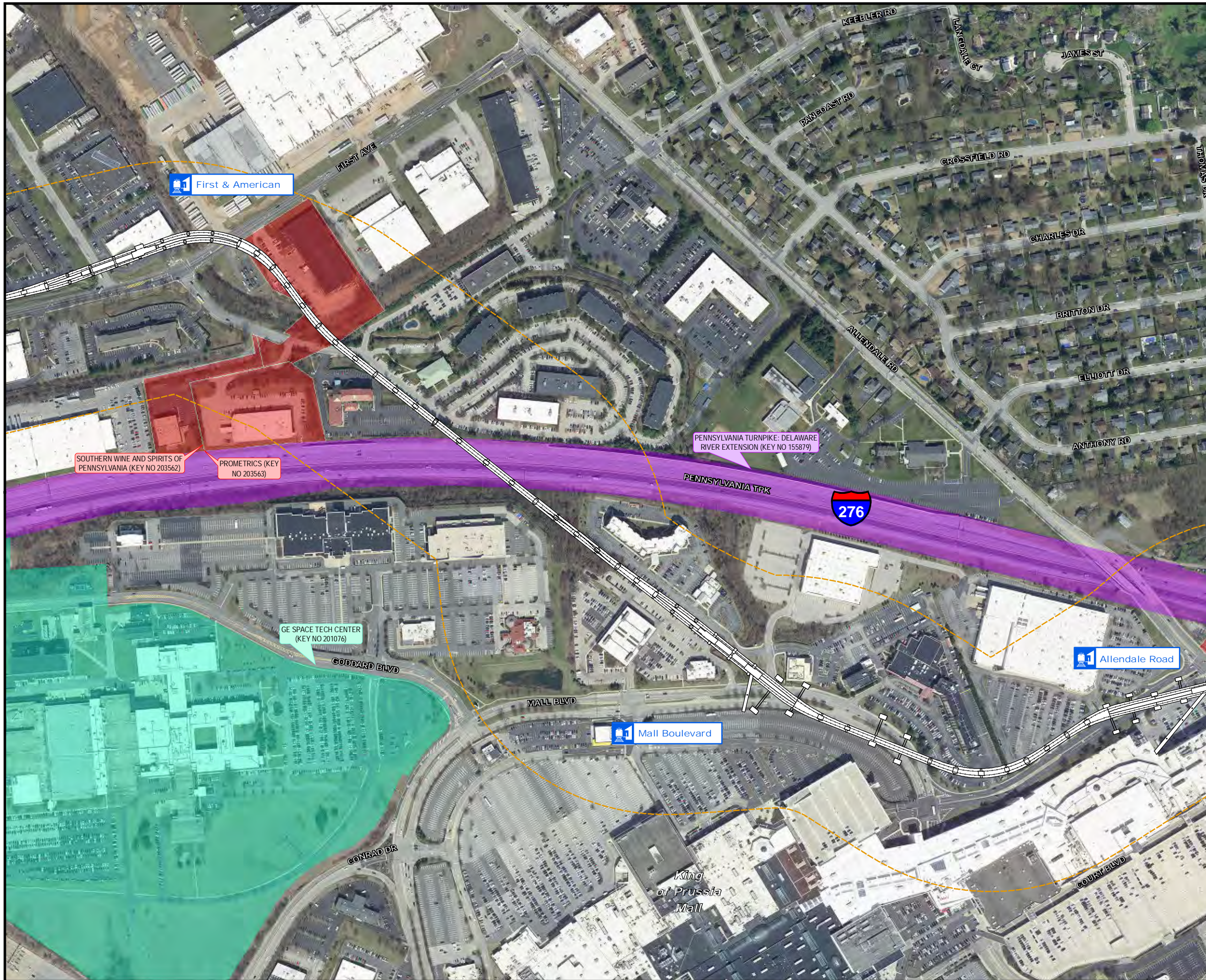


Figure 1b. KOP Rail Project: Preferred Alternative Plans.



Historic Architectural Resource

Previously Identified

- Listed/Eligible
- Not Eligible
- Undetermined

Evaluated & Recommended

- Not Eligible
- Eligible
- Potentially Eligible

- Modified APE for Historic Architecture

Proposed Improvements

- Aerial Structure
- PECO Tower
- Other Improvements
- Track Alignment

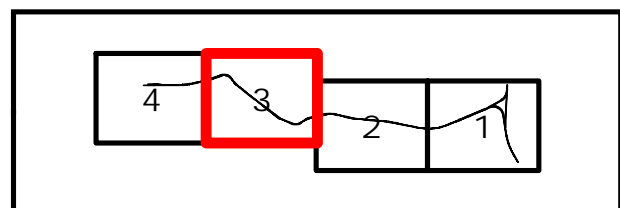
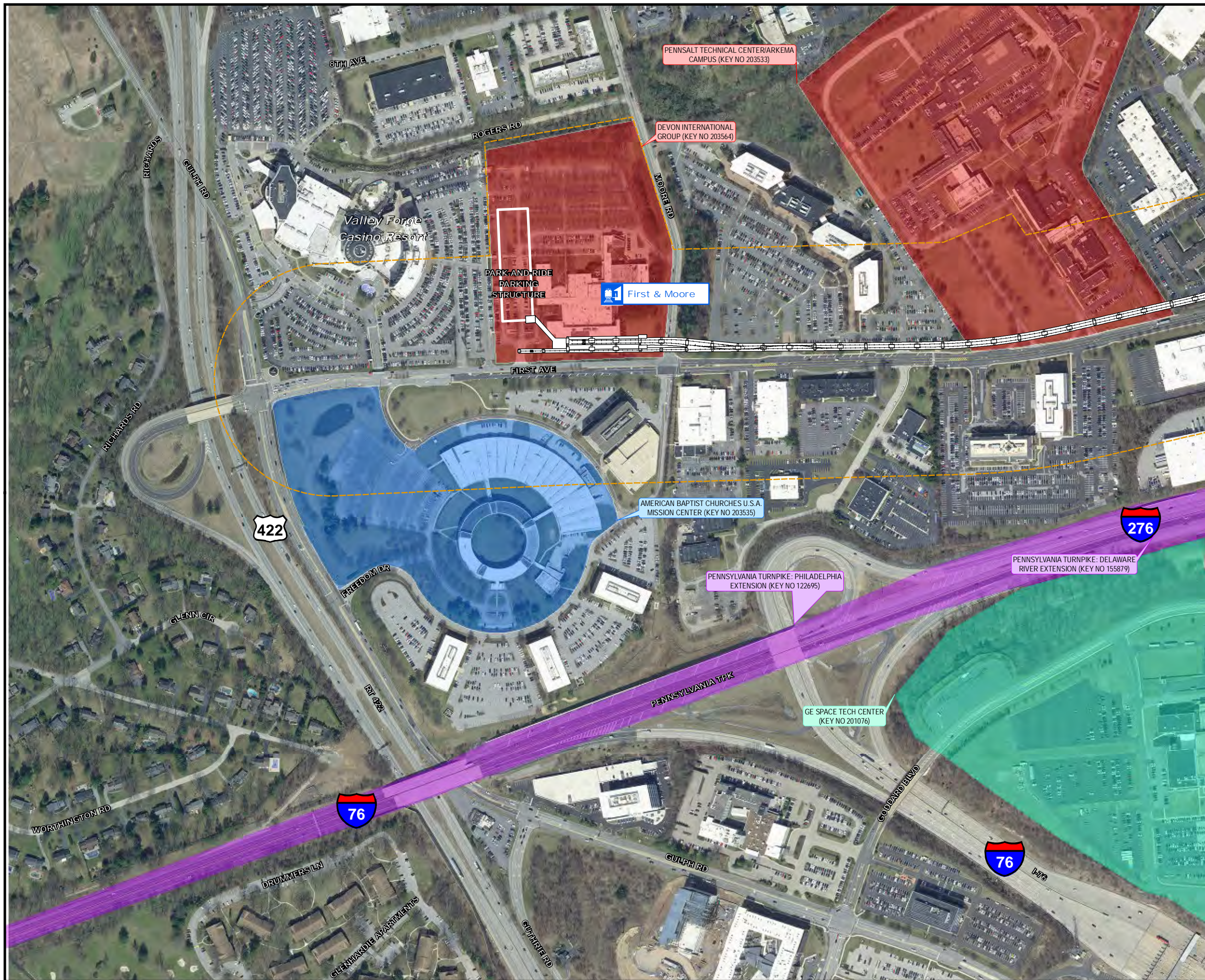


Figure 1c. KOP Rail Project: Preferred Alternative Plans.



Preferred Alternative: Sheet: 4 of 4
 KOP Rail FEIS

Historic Architectural Resource

Previously Identified

- Listed/Eligible
- Not Eligible
- Undetermined

Evaluated & Recommended

- Not Eligible
- Eligible
- Potentially Eligible

- Modified APE for Historic Architecture

Proposed Improvements

- Aerial Structure
- PECO Tower
- Other Improvements
- Track Alignment

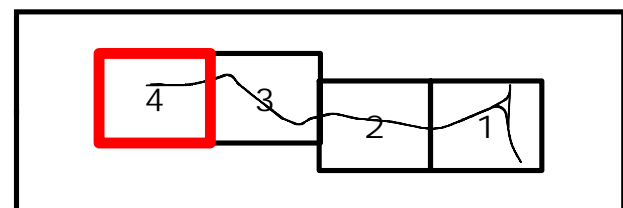


Figure 1d. KOP Rail Project: Preferred Alternative Plans.

Preferred Alternative:
KOP Rail FEIS -
(69th Street Transportation
Center)

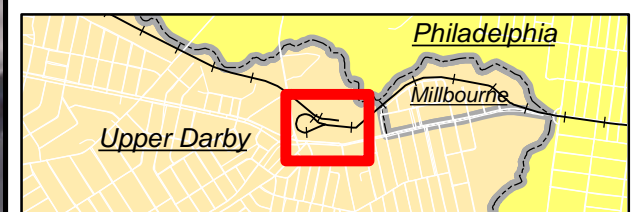
Historic Architectural Resource

- Listed/Eligible
- Not Eligible
(but contributes to eligible historic districts)

Modified APE for Historic Architecture

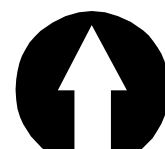
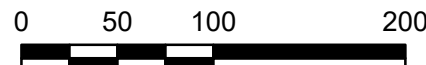
Proposed Improvements

- Station Improvement
- Other Improvements
- Track Alignment



Date: 10/21/2020

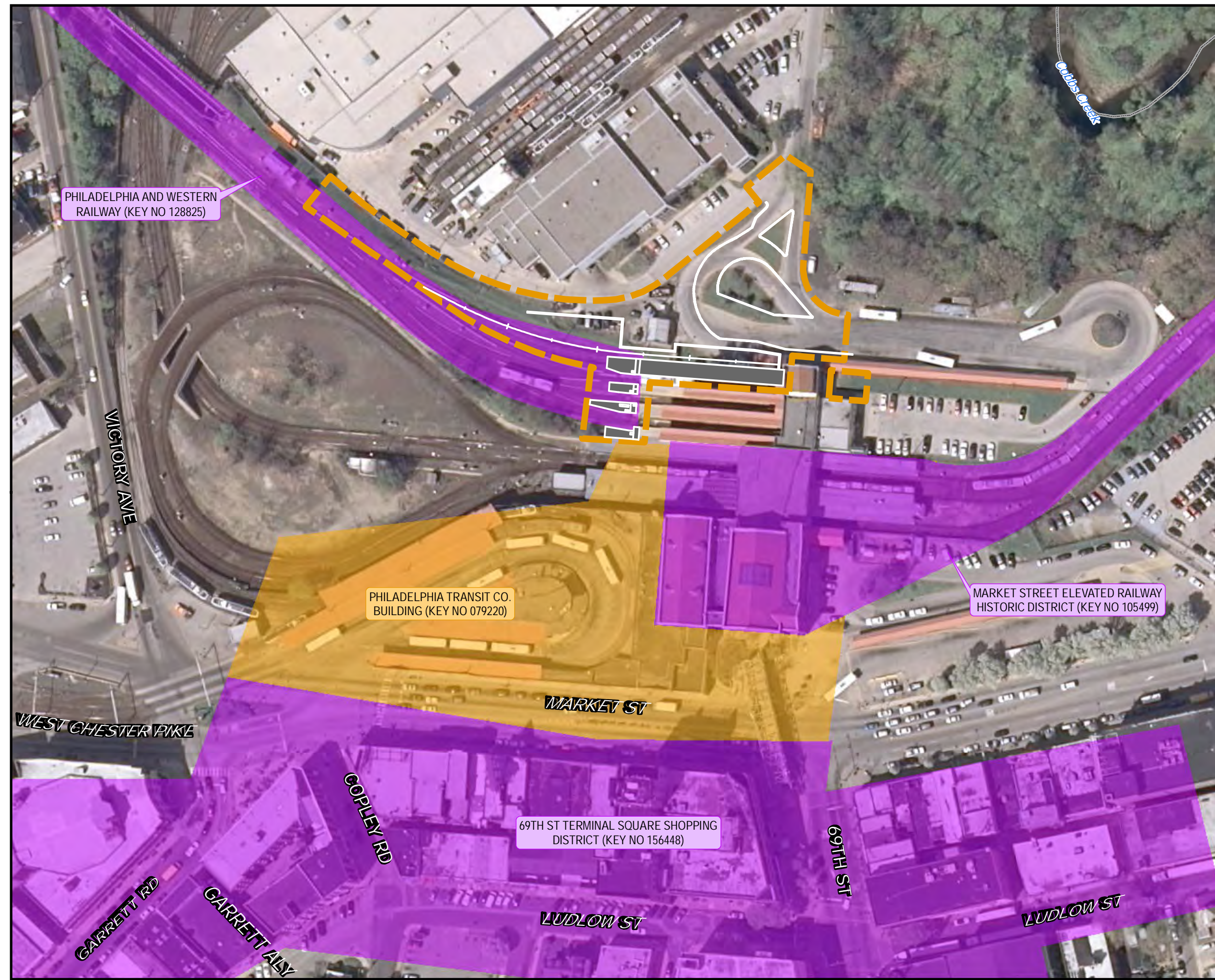
AECOM

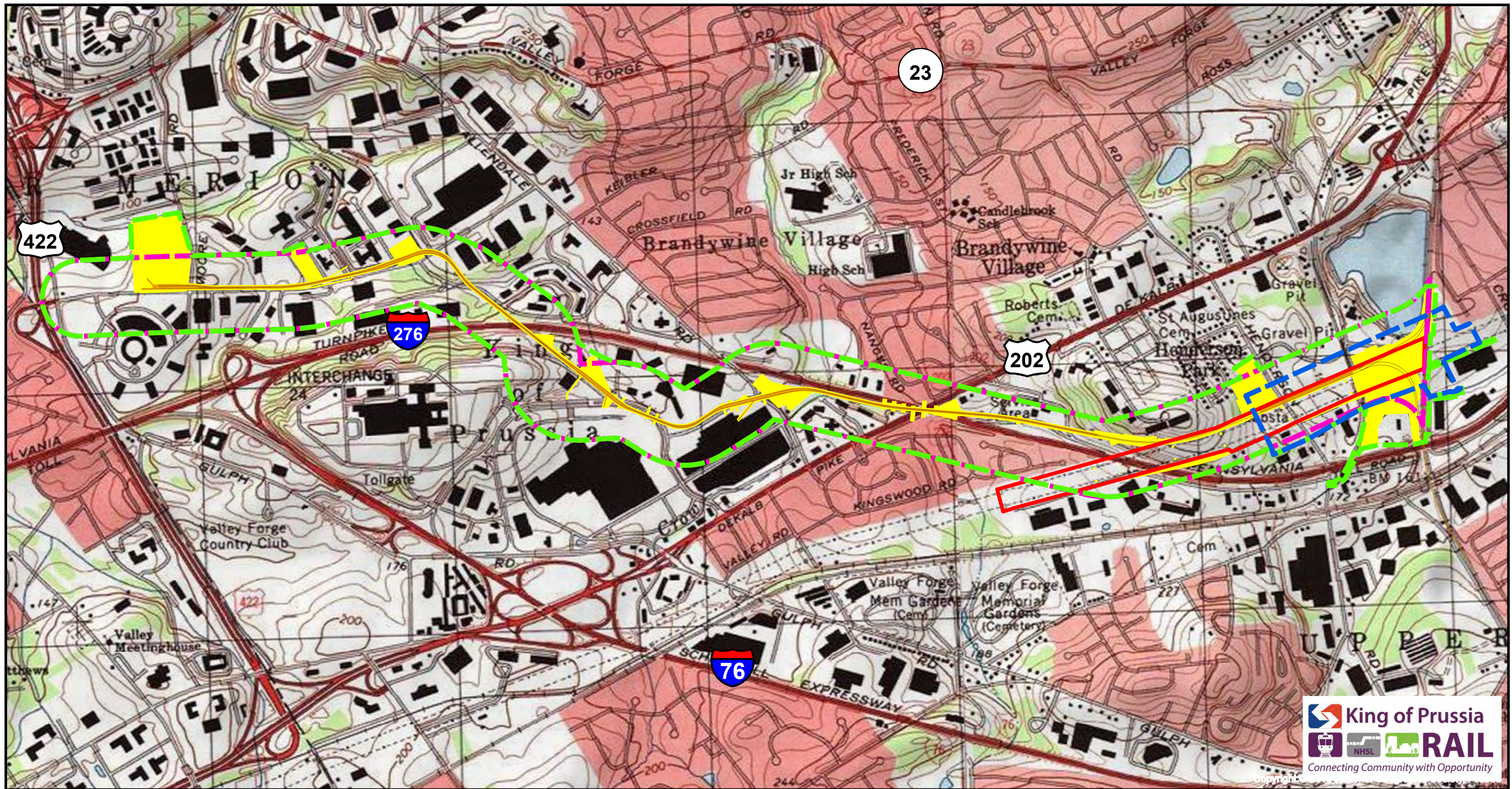



0 50 100 200
Feet

1 inch = 100 feet

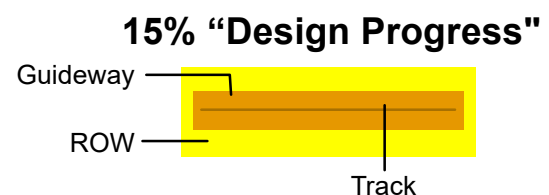
Source: 2018 PEMA Imagery, PASDA, PennDOT, HNTB & AECOM.





Preferred Alternative: Previous and Modified APEs for Historic Architecture

10/2/2020
Source: Upper Merion Twp, SEPTA, PASDA, DVRPC, AECOM.

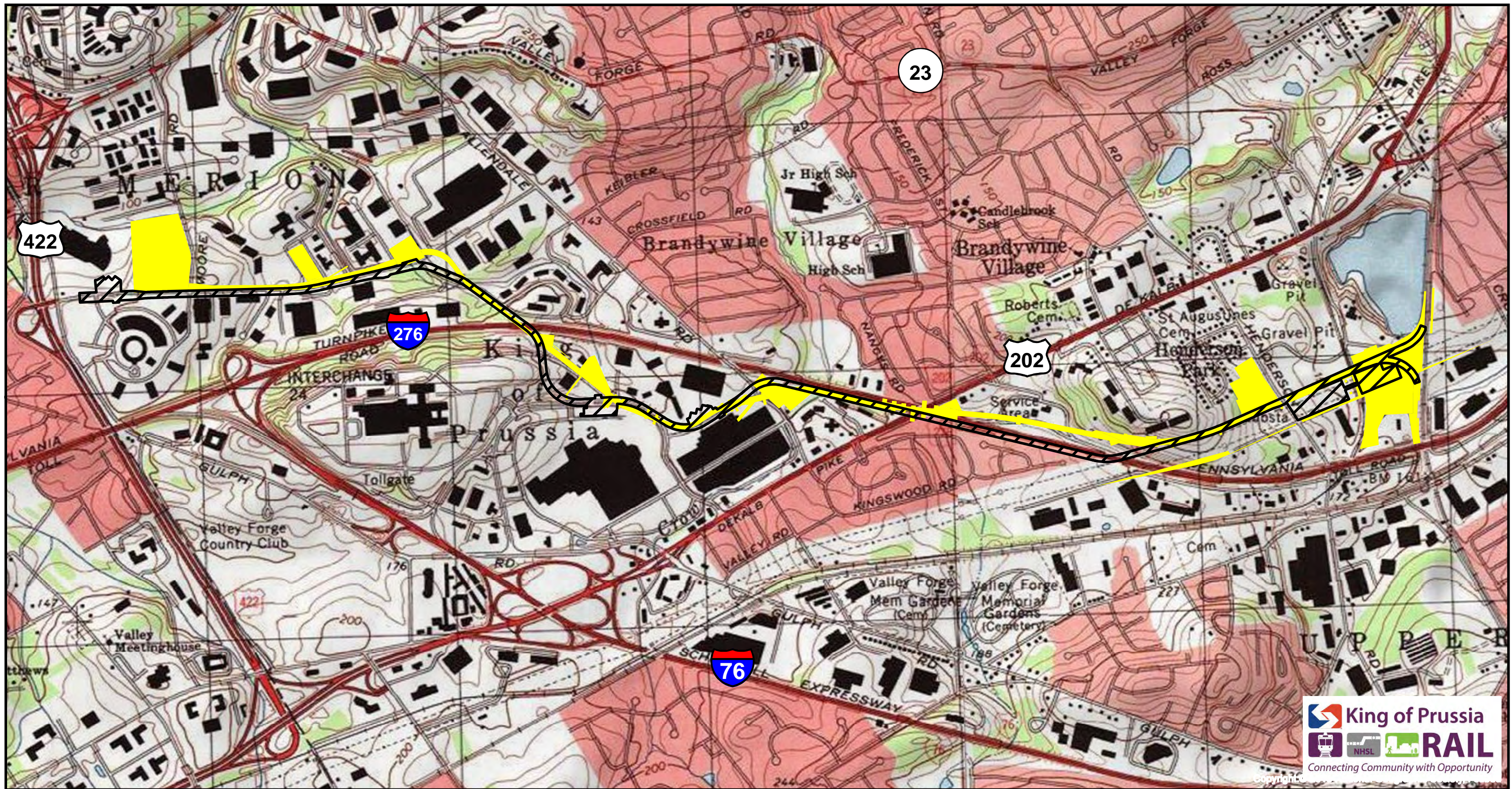


- Modified APE for Historic Architecture
- Previous APE for Historic Architecture

- PECO Visual APE
- PNJ Interconnection; Conowingo to Plymouth Meeting Transmission Line Resource Boundary



Figure 2. KOP Rail Project: Previous and Modified APEs for Historic Architecture.



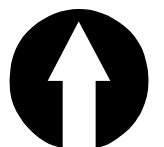
Preferred Alternative:
Previous and Modified APEs
for Archaeology



Previous APE for Archaeology



Modified APE for Archaeology



AECOM

0 600 1,200
Feet

Figure 5. KOP Rail Project: Previous and Modified APEs for Archaeology.

Appendix B: Project Correspondence

KOP Rail Project Section 106 Correspondence

- Section 106 Initiation Package (Review Form, Attachment and Figure 1)
- PHMC's Section 106 Initiation letter, April 4, 2013
- PHMC's Area of Potential Effects letter, March 7, 2016
- Section 106 Consulting Parties Meeting memorandum, September 8, 2016
- PHMC's Eligibility Concurrence letter on historic structures, September 26, 2016
- Stockbridge Munsee Community email, September 27, 2016
- Montgomery County letter, September 28, 2016
- Delaware Nation letter, October 19, 2016
- PHMC's Concurrence letter on archaeology, December 15, 2016
- PHMC's Concurrence Letter on Historic Structures Effects, March 16, 2017
- PHMC's Concurrence Letter on Historic Structures Eligibility and Effects, October 30, 2020



PROJECT REVIEW FORM

Request to Initiate SHPO Consultation on State and Federal Undertakings

SHPO USE ONLY

DATE RECEIVED:

ER NUMBER:

REV: 5/2012

SECTION A: GENERAL PROJECT INFORMATION

Is this a new submittal? ☒ YES ☐ NO OR ☐ This is additional information for ER Number:

Project Name Norristown High Speed Line Extension

County Montgomery

Project Address SETPA 1234 Market Street, 11th Floor

City/State/ Zip Philadelphia, PA 19107

Municipality Upper Merion Township

SECTION B: PRIMARY CONTACT INFORMATION

Name Alan Tabachnick

Phone (609) 310-3194

Company AECOM

Fax (609) 392-3785

Street/P.O. Box 516 East State Street

Email Alan.Tabachnick@aecom.com

City/State/Zip Trenton, New Jersey 08609

SECTION C: PROJECT DESCRIPTION

This project is located on:
(check all that apply) ☐ Federal property ☒ State property ☒ Municipal property ☒ Private property

List all Federal and State agencies and programs (funding, permits, licenses) involved in this project	Agency Type	Agency/Program/Permit Name	Project/Permit/Tracking Number (if applicable)
	Federal	Federal Transit Administration (FTA)	
	State	Southeastern Pennsylvania Transportation A	

Proposed Work – Attach project description, scope of work, site plans, and/or drawings

Project includes (check all that apply): ☒ Construction ☐ Demolition ☐ Rehabilitation ☐ Disposition

Total acres of project area: Unknown

Total acres of earth disturbance: Unknown

Are there any buildings or structures within the project area? ☒ Yes ☐ No Approximate age: Eighteenth to Twentieth Cent

This project involves properties listed in or eligible for listing in the National Register of Historic Places, or designated as historic by a local government	Yes <input checked="" type="radio"/>	No <input type="radio"/>	Unsure <input type="radio"/>	Name of historic property or historic districts	See Attachment
---	--------------------------------------	--------------------------	------------------------------	---	----------------

Please print and mail completed form and all attachments to:

PHMC
State Historic Preservation Office
400 North St.
Commonwealth Keystone Building, 2nd Floor
Harrisburg, PA 17120-0093

Attachments – Please include the following information with this form

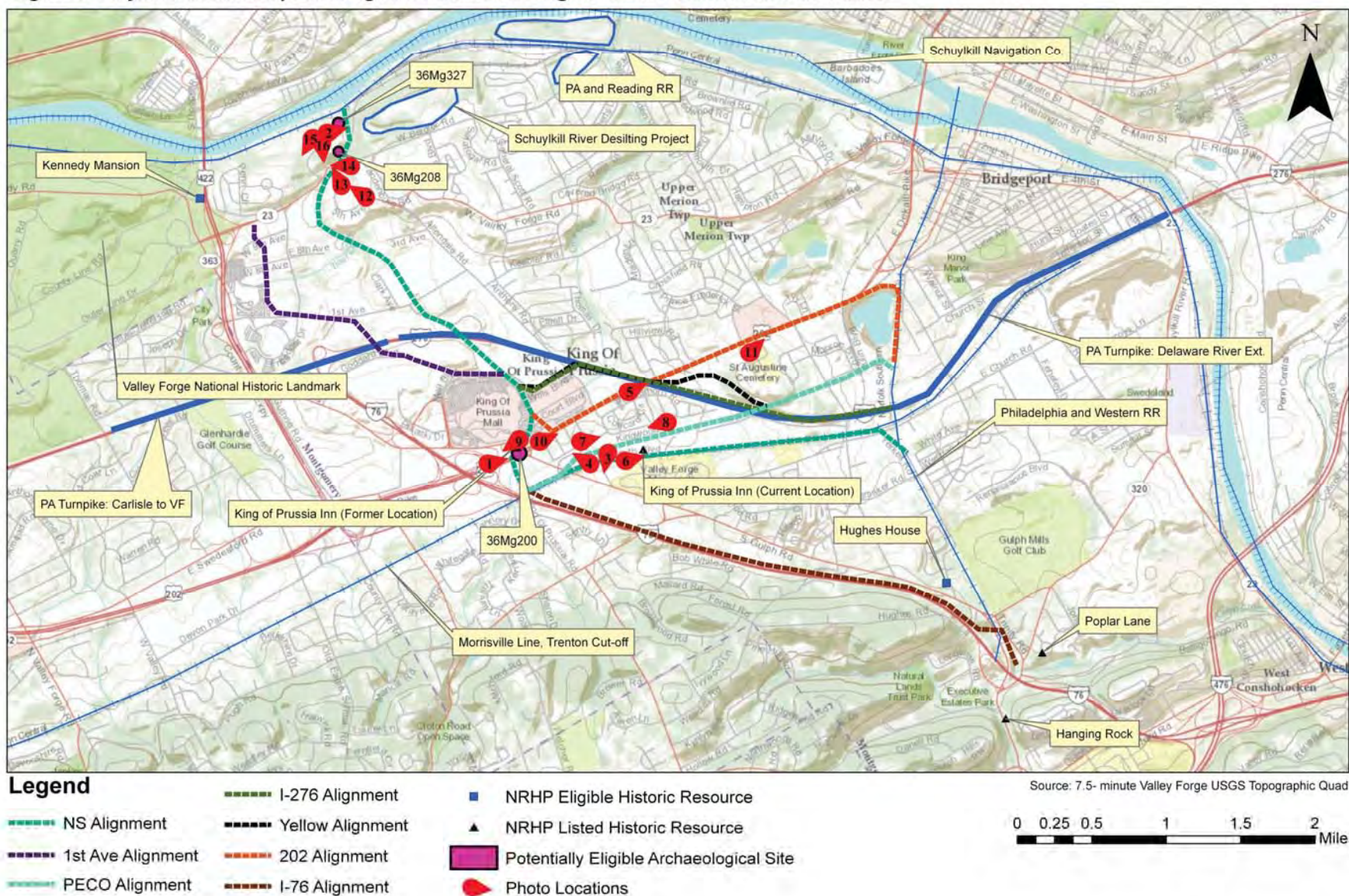
- | | |
|-------------------------------------|---|
| <input checked="" type="checkbox"/> | Map – 7.5' USGS quad showing project boundary and Area of Potential Effect |
| <input checked="" type="checkbox"/> | Description/Scope – Describe the project, including any ground disturbance and previous land use |
| <input type="checkbox"/> | Site Plans/Drawings – Indicate the location and age, if known, of all buildings in the project area |
| <input type="checkbox"/> | Photographs – Attach prints or digital photographs showing the project site, including images of all buildings and structures keyed to a site plan |

SHPO DETERMINATION (SHPO USE ONLY)

SHPO REVIEWER:

- | | |
|--|---|
| <input type="checkbox"/> There are NO HISTORIC PROPERTIES in the Area of Potential Effect | <input type="checkbox"/> The project will have NO ADVERSE EFFECTS WITH CONDITIONS (see attached) |
| <input type="checkbox"/> The project will have NO EFFECT on historic properties | <input type="checkbox"/> SHPO REQUESTS ADDITIONAL INFORMATION (see attached) |
| <input type="checkbox"/> The project will have NO ADVERSE EFFECTS on historic properties: | |

Figure 1: Project Location Map Showing NRHP Listed and Eligible Resources and Photo Locations



Project Description/Scope

The current project scope involves preparing an Alternatives Analysis/Draft Environmental Impact Statement (AA/DEIS) for the development of an extension of the existing Norristown High Speed Line Extension (NHSL) to the King of Prussia area in Montgomery County, PA. Planning for the project is in its infancy and detailed plans, and information on a preferred alignment is not available at this time. The Pennsylvania Historical and Museum Commission (PHMC) will be invited to be part of an agency committee for the project and will be provided with plans and more detailed information on impacts when these items are available. The purpose of submitting this form at such an early stage in the project is to initiate consultation with the PHMC early in the project's development and to elicit feedback on any agency concerns.

A major focus of the AA/DEIS will be to identify alternative alignments that are realistic and feasible given the development and infrastructure that exist in King of Prussia today. Before an alignment is chosen, the viability of these alternatives will be evaluated according to environmental constraints, the level of stakeholder support for these alternatives, and the likelihood of attracting public and private funding. Construction impacts will include (but are not limited to) new station construction, additional tracking within the existing rail corridors, signage and signaling installation, and improvements to the existing portions of the NHSL to support increased rail traffic resulting from the new branch line.

National Register of Historic Places (NRHP) Listed or Eligible Resources in the Project Vicinity

Table 1: Potentially Eligible NRHP Archaeological Sites Identified Within 250-ft of the Norristown HSL Project

Site #	Site Name	Site Type	Temporal Period	NR Eligibility
36Mg0200	King of Prussia Inn	Inn	Eighteenth and Nineteenth Century	*Considered Eligible by Submitter
36MG0208	Trout Run #4	Open Precontact Site, Unknown Function	Unknown Precontact	*Considered Eligible by Submitter
36MG0327	Site Trout Run 7	Open Precontact Site, Unknown Function	Unknown Precontact	*Considered Eligible by Submitter

*Source: PHMC CRGIS

Table 2: NRHP Listed and Eligible Historic Architectural Resources Identified Near the Norristown HSL Project

Resource Name	Resource Type	Construction Date	NRHP Status	Note
Kennedy Mansion	Building	1852	Eligible	-
Valley Forge National Historic Landmark	District	1778	Listed	-

SEPTA Norristown High Speed Line Extension
PHMC Project Review Form
September 26, 2012

Pennsylvania Turnpike: Philadelphia [Eastern] Extension (Carlisle to Valley Forge)	Structure	1950, 1948	Eligible	-
Pennsylvania Turnpike: Delaware River Extension	District	1954, 1952	Eligible	-
King of Prussia Inn	Building	1719	Listed	-
Schuylkill River Desilting Project	Structure	1947, 1951	Eligible	-
Schuylkill Navigation Company Canal (Port Carbon to Philadelphia)	District	1925, 1816 Alterations/Additions C. 1845	Eligible	-
Reading Railroad: Main Line (Philadelphia to Port Carbon)	District	1842, 1835, Alterations/Additions 1933	Eligible	-
Pennsylvania Railroad: Morrisville Line; Trenton Cut- Off	District	1892, 1889 Alterations/Additions C. 1904, C. 1915	Eligible	Montgomery and Bucks county portions determined eligible in 1993
Philadelphia and Western Railway (Upper Darby to Norristown); Norristown High- Speed 100 Line (Upper Darby to Norristown)	District	1912 Alterations/Additions C. 1989, C. 2003	Eligible	-
Hughes, John, House	Building	1740, 1803	Eligible	-
Poplar Lane	Building	1758	Listed	-
Hanging Rock	Site	1917 – 1924	Listed	-

*Source: PHMC CRGIS



Commonwealth of Pennsylvania
Pennsylvania Historical and Museum Commission
Bureau for Historic Preservation
Commonwealth Keystone Building, 2nd Floor
400 North Street
Harrisburg, PA 17120-0093
www.phmc.state.pa.us

4 April 2013

Alan Tabachnick
AECOM
516 E State Street
Trenton NJ 08609

Re: ER 2013-1006-091-A
Norristown High Speed Line Extension
Upper Merion Township, Montgomery County

Dear Mr. Tabachnick:

Thank you for submitting information concerning the above referenced project. The Bureau for Historic Preservation (the State Historic Preservation Office) reviews projects in accordance with state and federal laws. Section 106 of the National Historic Preservation Act of 1966, and the implementing regulations (36 CFR Part 800) of the Advisory Council on Historic Preservation, is the primary federal legislation. The Environmental Rights amendment, Article 1, Section 27 of the Pennsylvania Constitution and the Pennsylvania History Code, 37 Pa. Cons. Stat. Section 500 *et seq.* (1988) is the primary state legislation. These laws include consideration of the project's potential effects on both historic and archaeological resources.

Thank you for the project initiation package, including the mapping of the initial project area and National Register listed and eligible resources located within the vicinity, as well as the opportunity to participate in the Agency Advisory Committee Meeting on March 27, 2013.

We request review of a copy of the list of organizations and individuals that you plan to invite to participate in the Section 106 consultation process as consulting parties as well as additional information on your plan for tribal consultation. Since the project area contains a National Historic Landmark, you will need to include the appropriate representatives from the National Park Service in the Section 106 consultation process.

As the project alternatives are refined, we anticipate the receipt of more detailed information on the identification of historic properties and measures to avoid or minimize effects. To assist you in your identification of known historic and archaeological resources, the Bureau for Historic Preservation (PHMC-BHP) maintains records of National Register listed and eligible resources as well as archaeological surveys (P.A.S.S. files). Information on many of these resources is available on our web based Cultural Resources Geographic Information System (CRGIS) <http://crgis.state.pa.us>. Additional information is available in the survey reports and files of the PHMC-BHP's research room. Please consult the unpublished reports and files to determine what is known in the project area and whether or not the previous survey information may require an update.



Pennsylvania Historical & Museum Commission

Tom Corbett, Governor • Andrew E. Masich, Chairman • James M. Vaughan, Executive Director

A Tabachnick
ER 2013-1006-091-A
4 April 2013
Page 2 of 2

In addition, a comparison of historic (available at pennpilot.psu.edu) and current aerial mapping would be useful for identifying changes to the landscape over time as well as additional resources within the project vicinity that meet the National Register 50-year-age consideration.

We also welcome the opportunity for a site visit to identify 50-year-old resources not previously assessed for National Register eligibility and further assess the potential effects of the various alignments on National Register listed and eligible resources.

If you need further information regarding archaeological resources, please contact Mark Shaffer at (717) 783-9900. If you need further information concerning historic structures, please contact Barbara Frederick at (717) 772-0921.

Sincerely,



Douglas C. McLearen, Chief
Division of Archaeology & Protection

DCM/bcf



Pennsylvania State Historic Preservation Office

PENNSYLVANIA HISTORICAL AND MUSEUM COMMISSION

March 7, 2016

Ms. Terry Garcia Crews
ATT: Tony Cho
FTA, Region III
1760 Market Street, Suite 500
Philadelphia, PA 19103-4124

RE: ER 2013-1006-091-I; FTA: King of Prussia Rail Project; Upper Merion Township, Montgomery County; APE Report

Dear Ms. Garcia Crews,

Thank you for submitting information concerning the above referenced project. The Pennsylvania State Historic Preservation Office (PA SHPO) reviews projects in accordance with state and federal laws. Section 106 of the National Historic Preservation Act (NHPA) of 1966, and the implementing regulations (36 CFR Part 800) of the Advisory Council on Historic Preservation, is the primary federal legislation. The Environmental Rights amendment, Article 1, Section 27 of the Pennsylvania Constitution and the Pennsylvania History Code, 37 Pa. Cons. Stat. Section 500 et seq. (1988) is the primary state legislation. These laws include consideration of the project's potential effects on both historic and archaeological resources.

Archaeological Resources

The information you provided indicates a Phase IA archaeological survey will be completed for the Likely Preferred Alternative. Please provide a copy of the Phase IA report to our office for review and comment.

Above Ground Resources

Thank you for providing an Area of Potential Effects (APE) Report for the above-referenced project. Based on the information received as well as discussed in our March 3, 2016 conference call, we concur with the proposed APE and survey methodology for above ground resources. Please be sure to consult relevant guidelines and appropriate historic contexts for completion of the full HRSFs. In addition, please include historic and current aerial comparisons as appropriate in addition to the required attachments (USGS, photographs, site plans).

As captured in the March 3, 2016 meeting minutes, the following properties will be surveyed:

- ≠ Quarry Property – abbreviated Historic Resource Survey Form (HRSF)
- ≠ Philadelphia & Reading Railroad – contingent upon additional research into previous finding regarding the Chester Valley Railroad
- ≠ Brandywine Village District –full HRSF
- ≠ King of Prussia Arms Apartments – abbreviated HRSF (provided that apartment complex has no association with public housing)
- ≠ Allendale Road Farmhouse – abbreviated HRSF
- ≠ Wills Building – abbreviated HRSF
- ≠ Gatti & Morisson Building - abbreviated HRSF
- ≠ Southern W&S of PA - abbreviated HRSF
- ≠ ProMetrics - abbreviated HRSF

- ≠ Arkema Campus – full HRSF
- ≠ Devon International – abbreviated HRSF
- ≠ American Baptist Mission Center – full HRSF

Please be sure to consult relevant guidelines for completion of all forms (available from our website) and appropriate historic contexts for completion of the full HRSFs. In addition, please include historic and current aerial comparisons as appropriate in addition to the required attachments (USGS, photographs, site plans) for each of the full HRSFs.

For questions concerning archaeological resources, please contact Mark Shaffer at mshaffer@pa.gov or (717) 783-9900. For questions concerning above ground resources, please contact Emma Diehl at emdiehl@pa.gov or (717) 787.9121.

Sincerely,

A handwritten signature in black ink, appearing to read "D. C. McLearn", with a long horizontal flourish extending to the right.

Douglas C. McLearn, Chief
Division of Archaeology and Protection

C: Tony Cho, FTA
Liz Smith, SEPTA
Leslie Roche, AECOM
Kate Farnham, AECOM



U.S. Department
of Transportation
**Federal Transit
Administration**

REGION III
Delaware, District of
Columbia, Maryland,
Pennsylvania, Virginia,
West Virginia

1760 Market Street
Suite 500
Philadelphia, PA 19103-4124
215-656-7100
215-656-7260 (fax)

August 24, 2016

Andrea L. MacDonald
Director & Deputy State Historic Preservation Officer
Pennsylvania Historical and Museum Commission (PHMC)
PA State Historic Preservation Office
400 North Street, Second Floor
Harrisburg, PA 17120

Section 106 Consultation for the King of Prussia Rail Project, Upper Merion Township, Montgomery County, Pennsylvania (ER 2013-1006-091-A)

Dear Ms. McDonald:

As you are aware, the Federal Transit Administration (FTA) in cooperation with the Southeastern Pennsylvania Transportation Authority (SEPTA) has formally initiated and is continuing Section 106 consultation for the for the King of Prussia (KOP) Rail Project (project). This letter includes two reports: the *Intensive-Level Survey and Determination of Eligibility Report*, which identifies and assesses architectural resources in the Area of Potential Effects (APE) and the *Phase 1A Archaeological Survey Report*, which identifies and assesses the presence of and potential for archaeological resources in the APE. FTA formally requests PHMC review and concurrence with the eligibility determinations and recommendations (see **Enclosures 1 and 2**).

On August 8, 2016, SEPTA sent a "save-the-date" invitation to the invited Consulting Parties (see **Enclosure 3**) formally inviting them to participate in the Section 106 process and to attend the September 8, 2016 Consulting Party meeting at 10:30 am at Upper Merion Township Hall, 175 West Valley Forge Road in Upper Merion, PA. The purpose of the meeting is to discuss the findings of the enclosed reports with the invited Consulting Parties and to obtain input for the Section 106 process. The meeting will include a presentation of the project, a review of the resources identified in the enclosed reports, and a briefing on next steps under Section 106.

If you have any further questions, please contact Mr. Tim Lidiak, Community Planner, at (215) 656-7084.

Sincerely,

Daniel Koenig
Environmental Protection Specialist

cc: Emma Diehl, PHMC
Mark Shaffer, PHMC

Enclosures:

Enclosure 1: Intensive Level Survey Determination of Eligibility Report
Enclosure 2: Phase 1a Archaeological Survey Report
Enclosure 3: Invited Consulting Parties

Enclosure 3

Invited Consulting Parties

- Pennsylvania Historical and Museum Commission
- National Park Service, Northeast Region
- Valley Forge National Historical Park
- Montgomery County Planning Commission
- Montgomery County Division of Parks, Trails and Historic Sites
- Historical Society of Montgomery County
- The Heritage Conservancy
- Upper Merion Township Planning Commission
- King of Prussia Historical Society
- Chester County Historic Preservation Network
- Chester County Historical Society
- Chester County Planning Commission
- Tredyffrin Historic Preservation Trust
- Tredyffrin Township Historical Commission
- Upper Darby Township
- Upper Darby Historical Society
- Delaware County Planning Department
- Delaware County Historical Society
- Preservation Alliance for Greater Philadelphia
- The Delaware Tribe
- The Delaware Nation
- The Oneida Indian Nation
- The Eastern Shawnee Tribe of Oklahoma
- Stockbridge-Munsee Community of Mohican Indians

**King of Prussia Rail
Norristown High Speed Line AA / DEIS
Section 106 Consulting Parties Meeting 1
Summary**

Date: September 8, 2016
Time: 10:30 AM
Location: Upper Merion Township Building

Participants

Kate Farnham	AECOM
Marge Quinn	AECOM
Leslie Roche	AECOM
Jesse Walker	AECOM
Beverlee Barnes	Delaware County
Dan Koenig	FTA
Tim Lidiak	FTA
Janet Arcuicci	Montgomery County
Emma Diehl	PHMC
Mark Shaffer	PHMC
Fritz Ohrenschall	SEPTA
Liz Smith	SEPTA
Stephen Burso	Tredyffrin Township
Erin McPherson	Tredyffrin Township
Jaque Camp	Upper Merion Township
Rob Loeper	Upper Merion Township

Summary of Meeting

- Introductions and sign-in sheet – Liz Smith opened the meeting with a round of introductions and sign-in sheet circulation.
- Project Overview
 - Liz outlined the meeting goals:
 - To inform attendees about the project and its relationship to cultural resources protected by Section 106; and
 - To gain feedback and input from consulting parties regarding study area cultural resources.
 - Liz then provided background on the project origins, schedule, planning process, alternatives development and screening, and the recommended locally preferred alternative (LPA).
- Section 106
 - Leslie Roche continued the meeting by describing the Section 106 process under the National Historic Preservation Act, the role of the Section 106 process to inform the NEPA DEIS process, FTA's role as lead agency, the PHMC's role as the State Historic Preservation Office, and the role of the consulting and interested parties.
 - Dan Koenig explained that as the lead agency, FTA is co-managing the project with SEPTA. It is early in the Section 106 process, which allows for dialog with the consulting parties as the project advances. Dan further explained that the format of engagement with the consulting parties is flexible. Thus, while today's session is a meeting, future interaction could be by phone or webinar if desired. Emma Diehl indicated that the PHMC is flexible in regard to the format for future consulting party meetings for the project, such as conference call.

- Kate Farnham continued the meeting by explaining the area of potential effect (APE) for historic architectural (above-ground) properties and the methodology for identifying such properties. Dan explained that FTA and SEPTA consulted with PHMC regarding the APEs for architectural history and archaeology, and PHMC concurred with the proposed APE boundaries earlier this year.
- Kate then reviewed the properties evaluated for historic potential. She noted that initially properties 50 years old or older were identified for examination as potential historic properties because the Section 106 guidelines for assessment suggest that benchmark. Dan added that 50 years was determined to be a realistic benchmark for the project considering SEPTA's timely project implementation schedule. Fifty years equates to above-ground resources built in 1970-1971. Previous architectural survey work had been done in the APE and three previously identified properties were determined eligible for listing in the National Register of Historic Places. As part of this study, AECOM also identified and surveyed 10 new properties, of which one (the American Baptist Churches USA Mission Center) was recommended eligible for listing on the National Register of Historic Places.

Properties are eligible for the National Register of Historic Places because they achieve specific criteria for eligibility outlined by the Section 106 regulations. The four eligible/recommended-eligible properties include:

1. Pennsylvania Turnpike: Delaware River Extension
2. Philadelphia and Western Railway: Norristown High Speed Line
3. Market Street Elevated Railway Historic District
4. American Baptist Churches USA Mission Center

In addition, the APE includes the Philadelphia Transit Company Building. The oldest portion of this building is not eligible but contributes to two eligible historic districts (Market Street Elevated Railway Historic District and 69th Street Terminal Square Shopping District).

- Jesse Walker continued the meeting by explaining the survey for potential below-ground (archaeological) resources, the survey methodology and results. Because of extensive development and land re-contouring in the APE, the survey results indicate low sensitivity for archaeological resources; no further archaeological work is recommended within the APE.
- Leslie concluded the Section 106 presentation portion of the meeting with next steps, explaining that the AECOM team is preparing a draft Section 106 effects report. Dan noted that the DEIS would contain the eligibility report findings and PHMC concurrence, but if the effects report is not finalized by the time the DEIS is published, the DEIS will contain preliminary findings of effect. Leslie then asked for comments from consulting parties and described how comments could be provided. It was agreed with the consulting parties to provide written comments by October 1.
- Next steps - Liz outlined next steps for the Section 106 and NEPA processes.
- Question and comment period:
 - Emma Diehl stated that PHMC is in the process of updating their statewide historic preservation plan. Meetings are occurring across the state during this process, providing the opportunity for input from interested people and organizations. She offered that those interested could participate by signing up for PHMC's blog, accessible via www.phmc.pa.gov.
 - Mark Shaffer asked whether ancillary infrastructure to the project such as stormwater management facilities and utility relocations were accounted for in the APE for archaeology?

SEPTA and the AECOM team responded that at the current level of concept design, approximately 3 percent, areas for ancillary facilities are preliminarily accommodated. Mark responded that Phase 1A archaeological survey would be required if the APE were to increase to accommodate project-related facilities. Dan noted that future survey and consultation could occur, citing the future identification of specific locations and design of piers and stations.

- Dan encouraged the consulting parties to review the survey reports for above-ground and below-ground resources and provide comments in a timely manner. Consulting party input will be shared with PHMC.
- Beverlee Barnes noted that Delaware County's architectural inventory report from 1991, prepared by CHRS, is available at the County and at PHMC in hard copy.
- Stephen Burso asked about project funding. Liz responded that SEPTA is in the process of identifying potential funding sources, of which federal funding would be a part. She noted that SEPTA expects many non-Federal funding sources will make up the match. Dan noted that SEPTA is undertaking NEPA and Section 106 as required steps toward qualifying for FTA's Capital Investment Grant program.
- Attendees asked for the slide presentation from this meeting and the address and deadline for providing comments. Liz responded that the PowerPoint presentation would be shared by email with the contact information for providing comments. Leslie showed the comment slide indicating the ways to provide comments.
- Jaque Camp asked about the potential to locate a station near the project crossing of U.S. Route 202, citing nearby apartment complexes within walking distance. Liz responded that engineering challenges make citing a station at that location not practicable. She indicated that a potential pedestrian connection from 251 DeKalb could be made to the Henderson Road station. Also, the apartment owner near Allendale likes the pedestrian access to the proposed Mall station.
- Jaque asked whether there is a warrant for two stations at the Mall now that the two parts of the Mall are connected? Liz responded that SEPTA has discussed this same question with Simon Properties, the mall owner. The western station is warranted as it would also serve Lockheed-Martin. She also cited the long-term mall development plan around the second station.
- Dan asked if there is potential for future infill stations in the project corridor? Liz responded yes.
- Stephen asked several questions:
 - How will the elevated stations be accessed? Liz responded that where stations span streets, elevators and stairs would be provided on both sides of the streets. This provision would eliminate the need for at-grade street crossing.
 - What will be the visual effect to the Tredyffrin area of the terminal station at 1st Avenue, considering the elevated structure and pedestrian bridge? Liz responded that SEPTA is preparing and will share a 3D rendering that will depict the appearance of the terminal station in the context of surrounding development.
 - Is Valley Forge National Historical Park a consulting party? Liz responded affirmatively, saying the park has been involved in the project from the beginning of the current study.
 - Trout Creek runs under the casino property in a 12- to 18-foot diameter culvert. Rob Loeper added that the stream is located behind the casino buildings.



Pennsylvania State Historic Preservation Office

PENNSYLVANIA HISTORICAL AND MUSEUM COMMISSION

September 26, 2016

Mr. Dan Koenig
FTA
1760 Market Street, Suite 500
Philadelphia, PA 19103-4124

RE: ER 2013-1006-091-L; FTA: King of Prussia Rail Project; Upper Merion Township,
Montgomery County; Intensive-Level Survey Forms

Dear Mr. Koenig,

Thank you for submitting information concerning the above referenced project. The Pennsylvania State Historic Preservation Office (PA SHPO) reviews projects in accordance with state and federal laws. Section 106 of the National Historic Preservation Act of 1966, and the implementing regulations (36 CFR Part 800) of the Advisory Council on Historic Preservation, is the primary federal legislation. The Environmental Rights amendment, Article 1, Section 27 of the Pennsylvania Constitution and the Pennsylvania History Code, 37 Pa. Cons. Stat. Section 500 et seq. (1988) is the primary state legislation. These laws include consideration of the project's potential effects on both historic and archaeological resources.

Above Ground Resources

We offer the following comments in response to the intensive-level historic resource survey.

Eligible

Based on the information received and available within our files, we concur with the findings of the agency that the following property is **Eligible** for listing in the National Register of Historic Places:

- ≠ **National Offices of the American Baptist Church (588-590 N. Gulph Road)** – This property is Eligible for listing in the National Register of Historic Places under Criterion C in the area of Architecture, for the year 1962, the date of construction, for its exemplification of mid-century Modern architecture designed by notable architect Vincent Kling. The proposed boundary includes the current tax parcel, as indicated in the submission.

Not Eligible

We concur with the findings of the agency that the following properties are **Not Eligible** for listing in the National Register of Historic Places, due to a lack of integrity and/or significance:

- ≠ Brandywine Village
- ≠ King of Prussia Arms Apartments
- ≠ Elwood Powell House
- ≠ Wills Building (Key No. 097653)
- ≠ Gatti Morrison Construction Materials
- ≠ Southern Wine and Spirits of Pennsylvania

- ≠ ProMetrics
- ≠ Pensalt Technological Center (Arkema Campus)
- ≠ Devon International Group

No Additional Information Due to Potential for Effect

We concur with the scope and level of effort utilized to identify historic properties for this project, appropriate pursuant to 36 CFR Part 800.4, on the following properties as individual resources; however, if the proposed project route changes or if the agency anticipates direct effects to the following property, additional information in the form of a Historic Resource Survey Form may be required (upon consultation with our office):

- ≠ McCoy Quarry

For questions and/or future consultation regarding this review, please contact Emma Diehl at emdiehl@pa.gov or (717) 787-9121.

Sincerely,



Douglas C. McLearn, Chief
Division of Archaeology and Protection

From: Bonney Hartley [<mailto:Bonney.Hartley@mohican-nsn.gov>]
Sent: Tuesday, September 27, 2016 12:10 PM
To: Koenig, Daniel (FTA)
Cc: leslie.roche@aecom.com; Diehl, Emma (emdiehl@pa.gov); Shaffer, Mark (PHMC) (mshaffer@pa.gov); Smith, Elizabeth A (EASmith@septa.org)
Subject: RE: Section 106 Consultation - King of Prussia Project

Dear Dan:

On behalf of Stockbridge Munsee Community I confirm that we do not have significant cultural resource concerns with the King of Prussia Rail Project as proposed based on the archeological reports provided. Should the project alternative and APE change, we request continued consultation. If not, no further information is needed.

Best,
Bonney

Bonney Hartley
Tribal Historic Preservation Officer
Stockbridge-Munsee Mohican Tribal Historic Preservation
New York Office
65 1st Street
Troy, NY 12180
(518) 244-3164
Bonney.Hartley@mohican-nsn.gov
www.mohican-nsn.gov

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VALERIE A. ARKOOSH, MD, MPH, VICE CHAIR

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**MONTGOMERY COUNTY
PLANNING COMMISSION**

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610-278-3722

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WWW.MONTCOPA.ORG

JODY L. HOLTON, AICP
EXECUTIVE DIRECTOR

September 28, 2016

Leslie E. Roche, AICP
AECOM
510 Carnegie Center
Princeton, NJ 08540

Re: Section 106 Process for the King of Prussia
Regional Rail Project

Dear Ms. Roche:

Thank you for the consultation opportunity regarding the historic resources and the King of Prussia Rail project. We have reviewed the historic resources identified during the Section 106 process. We do not have any additional comments on either the previously identified or the newly identified resources for the project.

Should you have any further questions regarding this, please contact me at 610-278-3756 or jholton1@montcopa.org.

Sincerely,

Jody L. Holton, AICP, Executive Director
Montgomery County Planning Commission



The Delaware Nation

NAGPRA/106 Department

31064 State Highway 281
Anadarko, OK 73005
Phone (405)247-2448 Fax (405) 247-8905

NAGPRA	ext. 1182
Museum/106	ext. 1181
Library	ext. 1196
Director	ext. 1180

19 October 2016

To Whom It May Concern:

The Delaware Nation Cultural Preservation Department received correspondence regarding the following referenced project(s).

**Section 106 Consultation for the King of Prussia Rail Project, Upper Merion Township,
Montgomery County, Pennsylvania (ER 2013-1006-091-A).**

Our office is committed to protecting tribal heritage, culture and religion with particular concern for archaeological sites potentially containing burials and associated funerary objects.

The Lenape people occupied the area indicated in your letter during, or prior to, European contact until their eventual removal to our present locations. According to our files, the location of the proposed project does not endanger cultural or religious sites of interest to the Delaware Nation. **Please continue with the project as planned** keeping in mind during construction should an archaeological site or artifacts inadvertently be uncovered, all construction and ground disturbing activities should immediately be halted until the appropriate state agencies, as well as this office, are notified (within 24 hours), and a proper archaeological assessment can be made.

Please note the Delaware Nation, the Delaware Tribe of Indians, and the Stockbridge Munsee Band of Mohican Indians are the only Federally Recognized Delaware/Lenape entities in the United States and consultation must be made only with designated staff of these three tribes. We appreciate your cooperation in contacting the Delaware Nation Cultural Preservation Office to conduct proper Section 106 consultation. Should you have any questions, feel free to contact our offices at 405/247-8903 or by email: nalligood@delawarenation.com, or jross@delawarenation.com.

Nekole Alligood
NAGPRA/106 Director
The Delaware Nation
31064 State Highway 281
Anadarko, OK 73005



Pennsylvania State Historic Preservation Office

PENNSYLVANIA HISTORICAL AND MUSEUM COMMISSION

December 15, 2016

Mr. Dan Koenig
FTA
1760 Market Street, Suite 500
Philadelphia, PA 19103-4124

RE: ER 2013-1006-091-L: FTA – King of Prussia Rail Project, Upper Merion Township,
Montgomery County – Phase IA Archaeological Survey Report

Dear Mr. Koenig:

Thank you for providing information concerning the above referenced project. The Pennsylvania State Historic Preservation Office (PA SHPO) reviews projects in accordance with state and federal laws. Section 106 of the National Historic Preservation Act of 1966, and the implementing regulations (36 CFR Part 800) of the Advisory Council on Historic Preservation, is the primary federal legislation. The Environmental Rights amendment, Article 1, Section 27 of the Pennsylvania Constitution and the Pennsylvania History Code, 37 Pa. Cons. Stat. Section 500 et seq. (1988) is the primary state legislation. These laws include consideration of the project's potential effects on both historic and archaeological resources. Our comments are as follows:

Archaeological Resources

Based on the results of this investigation, we agree with the recommendation that no further archaeological investigation is necessary within the APE-Archaeology.

If you have any questions or comments concerning our review, please contact Mark Shaffer at (717) 783-9900 or MShaffer@pa.gov.

Sincerely,

Douglas C. McLearn, Chief
Division of Archaeology and Protection



U.S. Department
of Transportation
**Federal Transit
Administration**

REGION III
Delaware, District of
Columbia, Maryland,
Pennsylvania, Virginia,
West Virginia

1760 Market Street
Suite 500
Philadelphia, PA 19103-4124
215-656-7100
215-656-7260 (fax)

February 13, 2017

Mr. Douglas C. McLearen
Chief, Division of Archaeology & Historic Protection
Pennsylvania Historical and Museum Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

Re: Section 106 Consultation for the King of Prussia Rail Extension Project, Upper Merion Township, Montgomery County, Pennsylvania (ER 2013-1006-091-A)

Dear Mr. McLearen:

The Southeastern Pennsylvania Transportation Authority (SEPTA), in cooperation with the Federal Transit Administration (FTA), is continuing Section 106 consultation for the above-referenced project. As a Federal undertaking, the project is subject to Section 106 of the National Historic Preservation Act of 1966, as amended, and the associated implementing regulations, 36 CFR Part 800.

The Pennsylvania Historical and Museum Commission's (PHMC) letter of September 26, 2016 addressed eligibility of historic properties within the Project's delineated area of potential effect (APE) and requested additional information for one historic resource, the McCoy Quarry property. Enclosed you will find the *Section 106 Determination of Effects Report*, which identifies and assesses the potential effects of the project on resources listed on or eligible for listing on the National Register of Historic Places and the *Historic Resources Survey Form* for the McCoy Quarry property. The additional information on the McCoy Quarry property addresses the request from your September 26, 2016 letter.

Consulting parties are being provided copies of this letter and enclosures electronically for a concurrent 15-day review. FTA is requesting any comments on the enclosed reports from consulting parties within 15 days of receipt of this electronic letter and enclosures.

Hardcopies of the enclosures will be provided to PHMC. Please contact Mr. Timothy Lidiak, Community Planner, at (215) 656-7084 or by email at timothy.lidiak@dot.gov with any comments or inquiries on the Project.

Sincerely,

Daniel Koenig
Environmental Protection Specialist

Enclosures:
Section 106 Determination of Effects Report
Historic Resources Survey Form

cc: Emma Diehl, PHMC
Mark Shaffer, PHMC
Mike Caldwell, NPS – Northeast Region
Deirdre Gibson, Valley Forge National Historical Park
Frank Luther, King of Prussia Historical Society
Barry Rauhauser, Historic Society of Montgomery County
David Clifford, Montgomery County Division of Parks, Trails, and Historic Sites
Jody Holton, Montgomery County Planning Commission
Jacuelin Camp, Upper Merion Planning Commission
Rob Loeper, Upper Merion Planning Commission
Thomas Judge, Upper Darby Township
John Miller, Chester County Historic Preservation Network
Beth Lindsay, Chester County Historic Society
Matt Forester, Tredyffrin Township Historical Commission
Patty Benson, Tredyffrin Historic Preservation Trust
Thomas Shaffer, Delaware County Planning Department

Roche, Leslie

From: Koenig, Daniel (FTA) <daniel.koenig@dot.gov>
Sent: Tuesday, February 21, 2017 9:30 AM
To: Miller
Cc: Diehl, Emma (emdiehl@pa.gov); Lidiak, Timothy (FTA); Shaffer, Mark (PHMC) (mshaffer@pa.gov); Roche, Leslie; Smith, Elizabeth A (EASmith@septa.org); Quinn, Margaret; Ohrenschall, Frederick A (FOhrenschall@septa.org)
Subject: RE: Section 106 for the King of Prussia Rail Extension Project

Mr. Miller,

Thank you for the feedback and review. I'm cc'ing PHMC and SEPTA for their awareness of your comment.

-Dan

From: Miller [<mailto:jonrobjam@verizon.net>]
Sent: Sunday, February 19, 2017 1:01 PM
To: Koenig, Daniel (FTA)
Subject: Re: Section 106 for the King of Prussia Rail Extension Project

Mr. Koenig:
The Chester County Historic Preservation Network has "No Comment."
John Miller
President of the CCHPN

From: [Koenig, Daniel \(FTA\)](#)
Sent: Monday, February 13, 2017 3:57 PM
To: dmclearn@pa.gov
Cc: [Zubrzycki, Kathleen \(FTA\)](#) ; [Tarone, Tony \(FTA\)](#) ; [Lidiak, Timothy \(FTA\)](#) ; leslie.roche@aecom.com ; <mailto:emdiehl@pa.gov> ; <mailto:mshaffer@pa.gov> ; mike_caldwell@nps.gov ; deirdre_gibson@nps.gov ; info@kophistory.org ; dcliffor@montcopa.org ; jholton1@montcopa.org ; jcamp@wrtdesign.com ; rloeper@umtownship.org ; tjudge@upperdarby.org ; jonrobjam@verizon.net ; blindsay@chestercohistorical.org ; tredyffrin@tredyffrin.org ; info@tredyffrinhistory.org ; info@tredyffrinhistory.org
Subject: Section 106 for the King of Prussia Rail Extension Project

Dear Mr. McLearn and Consulting Parties,

The Federal Transit Administration (FTA) is providing the attached letter and below enclosures via hyperlink for a 15-day review under Section 106 of the National Historic Preservation Act for the above-referenced project. The below link is only active for 7 days so please contact myself if you need a refreshed hyperlink or wish to receive a hardcopy of the enclosed materials. FTA is requesting consulting party comment on the materials in the below link within 15-days of this email notification. After any potential comments from consulting parties are considered, FTA will seek PHMC's concurrence on effect under Section 106 for the project.

Updated Effects Report and Quarry Form Addendum

This file will be available for download until **2/20/2017**

[Download all files \(.zip\)](#)

Please contact me with any questions. Thanks.

-Dan

Daniel Koenig
Environmental Protection Specialist
Federal Transit Administration
1990 K Street, NW | Suite 510
Washington, DC 20006
202.219.3528 (o) | 202.219.3545 (f)



Pennsylvania State Historic Preservation Office

PENNSYLVANIA HISTORICAL AND MUSEUM COMMISSION

March 16, 2017

Mr. Daniel Koenig
Environmental Protection Specialist
FTA, Region III
1760 Market Street, Suite 500
Philadelphia, PA 19103

RE: ER 2013-1006-091-O; FTA: King of Prussia Rail Extension Project; Upper Merion Township, Montgomery County; Determination of Effects Report

Dear Mr. Koenig,

Thank you for submitting information concerning the above referenced project. The Pennsylvania State Historic Preservation Office (PA SHPO) reviews projects in accordance with state and federal laws. Section 106 of the National Historic Preservation Act of 1966, and the implementing regulations (36 CFR Part 800) of the Advisory Council on Historic Preservation, is the primary federal legislation. The Environmental Rights amendment, Article 1, Section 27 of the Pennsylvania Constitution and the Pennsylvania History Code, 37 Pa. Cons. Stat. Section 500 et seq. (1988) is the primary state legislation. These laws include consideration of the project's potential effects on both historic and archaeological resources.

Determination of Eligibility- McCoy Quarry (Key No. 203554)

Based on the information received and available within our files, it is the opinion of the State Historic Preservation Officer that the **McCoy Quarry (Key No. 203554)** is **Not Eligible** for listing in the National Register of Historic Places due to a lack of integrity.

Determination of Effects

Based on the information received, we concur with the findings of the agency that the proposed project will have **No Adverse Effect** on the Pennsylvania Turnpike: Delaware River Extension (Key No. 155879); the American Baptist Churches USA Mission Center (Key No. 203535); and the Philadelphia and Western Railway: Norristown High Speed Line (Key No. 128825). We concur with the findings of the agency that the proposed project will have **No Effect** on the Market Street Elevated Railway Historic District (Key No. 105499) and the 69th Street Terminal Square Shopping District (Key No. 156448)

If you need further information concerning this review and/or project plans should change, please contact Emma Diehl at emdiehl@pa.gov or (717) 787-9121.

Sincerely,

Douglas C. McLearn, Chief
Division of Archaeology and Protection



Pennsylvania State Historic Preservation Office

PENNSYLVANIA HISTORICAL AND MUSEUM COMMISSION

October 30, 2020

Ms. Shauna Haas
Federal Transit Administration
1835 Market Street, Suite 1910
Philadelphia, PA 19103

RE: ER 2013-1006-091-R; FTA: King of Prussia Rail Extension; Upper Merion Township, Montgomery County; Design Refinements – Determination of Effects

Dear Ms. Haas,

Thank you for submitting information concerning the above referenced project. The Pennsylvania State Historic Preservation Office (PA SHPO) reviews projects in accordance with state and federal laws. Section 106 of the National Historic Preservation Act of 1966, and the implementing regulations (36 CFR Part 800) of the Advisory Council on Historic Preservation, is the primary federal legislation. The Environmental Rights amendment, Article 1, Section 27 of the Pennsylvania Constitution and the Pennsylvania History Code, 37 Pa. Cons. Stat. Section 500 et seq. (1988) is the primary state legislation. These laws include consideration of the project's potential effects on both historic and archaeological resources.

Proposed Project

The Federal Transit Administration (FTA) previously completed Section 106 consultation for the above-referenced project in March 2017. PA SHPO concurred with the overall project finding of No Adverse Effect. The overall project is SEPTA's proposed extension of the Norristown High Speed Line to King of Prussia. The proposed design has been refined to include areas and actions not addressed in previous consultation.

Area of Potential Effects

Based on the information received, we concur with the agency's Area of Potential Effects as presented in your submission for both archaeology and above ground resources.

Archaeological Resources

We concur with the findings that no archaeological resources will be affected by the proposed project as refined and that no additional archaeological survey is warranted.

Aboveground Resources

Identification of Historic Properties

One new potential historic property was identified as part of the refined design. Based on the information received and available within our files, we concur with the findings of the agency that the **Pennsylvania-New Jersey (PNJ) Interconnection: Conowingo to Plymouth Meeting Transmission Line** is **Eligible** as part of the overall PNJ Interconnection (Key No. 156601), a portion of which (Wallenpaupack to Siegfried) was determined eligible in 2011. The line is eligible under Criterion A in the areas of Engineering and Industry, as it forms part of an engineering innovation with wide-ranging impacts to the development of electrical power distribution grids and was an integral part of a landmark cooperative agreement creating a power-pool partnership between three regional utilities. The property is also eligible under Criterion C as a linear district of intact typical transmission structures dating from the line's original construction that collectively

represent the innovation in engineering that made successful long-distance, high-voltage transmission and creation of a power pool possible. The period of significance begins in 1927, when the PNJ Interconnection agreement was signed and ends in 1956, when the Baltimore Gas & Electric and General Public Utilities joined the utility pool. The boundary of the linear district includes the right-of-way, or 350' on center from line. While we agree that the portion within the APE retains integrity, it is likely that the boundary extends beyond the APE to possibly include the entire line itself.

Determination of Effect

Based on the information provided and available within our files, we concur with the agency finding that the proposed project, including the revised design, will result in No Adverse Effect to the following properties: Pennsylvania Turnpike: Delaware River Extension (Key No. 155679) and the Philadelphia and Western Railroad (Key No. 128825). We concur that the proposed project as refined will have No Effect on the Market Street Elevated Railway Historic District (Key No. 105499), the 69th Street Terminal Square Shopping District (Key No. 156448), and the American Baptist Churches USA Mission Center (Key No. 203535).

With regards to the PNJ Interconnection (Key No. 156601), we concur with the overall finding of the agency that the project as refined will result in an **Adverse Effect** to historic properties due to the necessity to physically remove at least four and up to seven original lattice towers that are contributing resources to the linear historic district. To comply with the regulations of the Advisory Council on Historic Preservation, the federal agency must follow the procedures outlined in 36 CFR 800.6 when the effect is adverse. Thank you for providing the additional information regarding consideration of alternatives that avoid or minimize effects to historic properties as well as documentation of consulting party coordination. The federal agency will need to notify the Advisory Council of the effect finding and continue to consult with the PA SHPO and other consulting parties, as participating, to seek ways to avoid, minimize, and/or mitigate the adverse effects on the historic property.

Resolution of Adverse Effects

We generally agree with the proposed mitigation as outlined in the draft Memorandum of Agreement provided on October 23, 2020. As proposed, SEPTA shall prepare GIS mapping of the portion of the PNJ Interconnection; Conowingo to Plymouth Meeting Transmission Line in Pennsylvania for submittal to PA SHPO and integration into PA SHPO's Cultural Resources Geographic Information System (CRGIS) and/or any successor GIS systems. Mapping shall be a boundary shape and cover the area of the resource between the Commonwealth of Pennsylvania border with Maryland and PECO's Plymouth Meeting Substation in Plymouth Meeting, Pennsylvania. The mapping shall be provided as ArcGIS shapefiles and shall be prepared and submitted in compliance with PA SHPO guidelines for GIS deliverables. This mapping will be an addendum to the resource as mapped in the previous Historic Resources Survey Form (HRSF) for the PNJ Interconnection; Conowingo to Plymouth Meeting Transmission Line (Key No. 156601).

In addition to the mapping proposed, PA SHPO offers for consideration an inventory of potential contributing resources for the section of line covered by the aforementioned mapping (the Commonwealth of Pennsylvania border with Maryland and PECO's Plymouth Meeting Substation) as part of this effort. This would include substations and lattice towers as well as any other supporting structures identified. The inventory would be submitted as an addendum to the HRSF in accordance with current PA SHPO standards and could be provided in table format to include name, type, estimated construction date, and photographs. Photographic documentation could include individual photographs for resources such as substations, and representative

photographs for repetitive features, such as the lattice towers. In addition, as the mapping was somewhat difficult to discern in the HRSF provided for the PNJ Interconnection (Figure 2 of the HRSF submitted), a revised map illustrating the area documented (between the Pennsylvania/Maryland border and the Plymouth Meeting Substation) on current aerial mapping should be provided.

Please note, however, that concurrence with this proposed mitigation should not preclude consideration of any other mitigation options proposed by other consulting parties, if presented.

If you need further information concerning this review and/or future consultation, please contact Emma Diehl at emdiehl@pa.gov or (717) 787-9121.

Sincerely,

A handwritten signature in black ink, appearing to read "D. McLearen", written over a horizontal line.

Douglas C. McLearen, Chief
Division of Environmental Review

Appendix C: Section 106 Eligibility/Effects Package, October 2020



Pennsylvania
Historical & Museum
Commission

PROJECT REVIEW FORM

Request to Initiate SHPO Consultation on
State and Federal Undertakings

SHPO USE ONLY

Reviewers: _____/_____

DATE RECEIVED:

DATE DUE:

ER NUMBER:

HRSF: ☐

REV: 07/2020

SECTION A: PROJECT NAME & LOCATION

Is this a new submittal? ☐ YES ☐ NO OR ☒ This is additional information for ER Number: 2013-1006-091

Project Name King of Prussia Rail Extension County Montgomery Municipality Upper Merion
Project Address Between NHSL and Upper Gulph Rd./1st Ave. City/State/ Zip King of Prussia PA 19406

SECTION B: CONTACT INFORMATION & MAILING ADDRESS

Name Shauna Haas and Tim Lidiak Phone (215) 656-7053
Company Federal Transit Administration Fax
Street/PO Box 1835 Market Street, Suite 1910 Email shauna.haas@dot.gov
City/State/Zip Philadelphia PA 19103 Email cc: tim.lidiak@dot.gov

SECTION C: PROJECT DESCRIPTION

This project is located on: ☐ Federal property ☒ State property ☐ Municipal property ☒ Private property
(check all that apply)

List all federal and state agencies and programs providing funds, permits, licenses.	Agency Type	Agency/Program/Permit Name	Project/Permit/Tracking Number (if applicable)
	Federal	Federal Transit Administration	

Proposed Work – Attach project description, scope of work, site plans, and/or drawings

Project includes (check all that apply): ☒ Construction ☒ Demolition ☐ Rehabilitation ☐ Disposition

Total acres of project area: 485 Total acres of earth disturbance: 92

Are there any buildings or structures within the project area? ☐ Yes ☐ No Approximate age of buildings: 50-100 years

Does this project involve properties listed in or eligible for the National Register of Historic Places, or locally designated? Inventory here: <https://gis.penndot.gov/crgis> Yes ☐ No ☐ Unsure ☐
Name multiple
Key Number

**Please email this form
and pdf attachments to:
RA-PH-PASHPO-ER@pa.gov**

Please be sure to save the Project Review Form so that it remains a digital document and retains its function as a fillable pdf. Do not print the form and scan as a pdf.

Attachments – Please include the following information with this form

- ☒ Map – 7.5' USGS quad, streetmap, or parcel map showing the project's Area of Potential Effect
- ☒ Description/Scope of Work – Narrative description of the project, including any ground disturbance and previous land use, and any potential to impact historic resources
- ☒ Site Plans/Drawings – Indicate location and age of buildings, any proposed improvements, and past and present land use
- ☒ Photographs – Digital photographs of all buildings and structures keyed to a site plan. If demolition or exterior changes are proposed to buildings more than 50 years old, please also include Abbreviated HRSF

SHPO RESPONSE (SHPO USE ONLY)

- ☐ There are NO HISTORIC PROPERTIES in the Area of Potential Effect ☐ SHPO REQUESTS ADDITIONAL INFORMATION (see attached)
- ☐ The project will have NO EFFECT on historic properties
- ☐ The project will have NO ADVERSE EFFECTS on historic properties: _____ Key# _____

DIVISION CHIEF, ENVIRONMENTAL REVIEW:

DATE: _____

SHPO REVIEWER: _____



U.S. Department
of Transportation
**Federal Transit
Administration**

REGION III
Delaware, District of
Columbia, Maryland,
Pennsylvania, Virginia,
West Virginia

1835 Market St
Suite 1910
Philadelphia, PA 19103-2968
215-656-7100

October 19, 2020

Mr. Douglas McLearen
Division Chief, Environmental Review
Pennsylvania Historical & Museum Commission
State Historic Preservation Office
400 North Street, 2nd Floor
Harrisburg, PA 17120-0093

RE: Section 106 Consultation for the King of Prussia (KOP) Rail Project, Upper Merion Township, Montgomery County, Pennsylvania (ER 2013-1006-091-A)

Dear Mr. McLearen:

The Federal Transit Administration (FTA), in cooperation with the Southeastern Pennsylvania Transportation Authority (SEPTA), previously completed Section 106 consultation for the above-referenced Project on March 16, 2017, with the Pennsylvania State Historic Preservation Office (PA SHPO) concurring with FTA's finding of no adverse effect.

The purpose of this letter is to reopen Section 106 consultation for the Project because of design refinements that change the limits of disturbance and the Area of Potential Effects (APE) of the Project. FTA is presenting for SHPO consideration and concurrence the modified APEs for architecture and archaeology, assessment of historic properties not previously documented within this modified APE, and an evaluation of effects based on the design refinements and newly identified historic resources.

Modified APE for Historic Architecture

The modified APE for architecture, depicted in Attachment A, Figures 1 and 2, includes the following additional areas, all in Upper Merion Township:

- Norristown High Speed Line (NHSL) - The APE boundary is moved from the centerline of the NHSL to the eastern edge of the Project limits of disturbance along the NHSL to accommodate widening of the existing rail embankment where the Project joins the NHSL; the embankment will be widened to accommodate the Project track interconnection with the existing NHSL tracks. Work will occur entirely within the right-of-way (ROW) of the NHSL.
- Between Henderson Road and the NHSL - The APE boundary is expanded to the south to accommodate the following refined Project elements:
 - A proposed drainage easement along the west side of the NHSL;
 - Full parcel acquisition of the Republic Services property (owned by Browning-Ferris Industries);
 - A driveway easement between Henderson Road and a proposed stormwater management basin; and

- A sliver of land that SEPTA will purchase adjacent to the southern edge of the PECO Energy Company (PECO) corridor to offset right-of-way needs from the north edge of the PECO corridor.
- Henderson Road Area - The APE boundary is expanded to the north to accommodate a parking structure for Henderson Road Station and temporary construction easement along Henderson Road.
- Mall Boulevard Area - The APE boundary is expanded north of existing Mall Boulevard to accommodate the refined location of Mall Blvd Station in the vicinity of the Hyatt House Hotel.
- First Avenue Area - The APE boundary is expanded on the north side of First Avenue in Moore Park (formerly KOP Business Park) to accommodate the following elements:
 - A proposed stormwater management basin on a portion of the existing Arkema property; and
 - Full parcel acquisition of the Devon International Group property (owned by Royale Garden) on the west side of Moore Road to accommodate the refined location of First & Moore Station.

The modified APE was determined based on the refined design alternatives, desktop analysis, and field survey. The APE was expanded to include land acquisitions for construction, stormwater drainage, and other easements immediately west of the NHSL and south of the proposed rail extension, and for parking structures at the Henderson Road Station and First & Moore Station, including parcels or portions of land parcels that extend beyond the original APE (see Attachment A, Figures 1 and 2). The Republic Services property, located in a low-lying area between Saulin Blvd. and the PA Turnpike, is surrounded by the NHSL, the elevated PA Turnpike, and modern development on Saulin Blvd., and as such, work at this location would not have visual impacts to surrounding properties. Proposed driveway easements nearby are through already-modernized areas and mostly utilize existing driveways or parking areas. Field survey of the viewsheds in the proposed Henderson Road station parking area indicated that the parcels to be acquired are surrounded by wooded buffers, and that due to distance, vegetation, and topography, the proposed multistory parking structures would not have visual impacts to adjacent properties. At the First & Moore station, where the Devon International Group parcel would be cleared for a parking structure, the parcel is surrounded by modern office parks, a wooded stream valley, and the modern Valley Forge Casino complex. Again, there would not be visual impacts to surrounding properties. As such, the modified APE was limited to the parcel boundaries for all of these acquisitions.

The design refinements also call for replacement of several high-voltage transmission towers in the PECO corridor with taller monopole structures near the east end of the APE, which has the potential to be visible from nearby properties. The previous study called for potential replacements of some towers, and a visual analysis was undertaken at that time as part of determining the APE. As the current design refinements provide further identification of which towers would be affected, a reassessment of the potential for visual effects to historic resources from the proposed monopoles was undertaken. An APE for visual impacts was defined based on the proposed height of the monopoles, the surrounding terrain, vegetation, and existing land uses (see Attachment A, Figure 2).

The portion of the APE for historic architecture in the vicinity of the affected PECO transmission towers is characterized by terrain that slopes down from higher elevations to a low point in the vicinity of the NHSL and Saulin Boulevard. Land uses surrounding the PECO corridor between the NHSL and the PA Turnpike are primarily modern residential, commercial, and industrial uses. Tree and shrub vegetation at the edges of properties in the vicinity of the PECO corridor is consistently tall and thick. These existing characteristics, along with topography and existing built resources, constrain views of the PECO corridor from the north, east, and west such that the replacement towers will either not be visible or would be in the background and not focal points of views that affect the setting of potential historic resources. Much of the visible horizon surrounding the east end of the corridor is already cluttered by existing transmission and cellular towers, as well as elevated water tanks. From the south, the proposed towers will be visible for a longer distance because the land slopes downward in that direction. However, the PA Turnpike is elevated across that viewshed and will mostly obstruct views from the south.

Eligibility for Historic Architecture

PNJ Interconnection; Conowingo to Plymouth Meeting Transmission Line

One new potential historic resource has been identified within the modified APE: the PECO transmission line corridor is a portion of the Pennsylvania-New Jersey (PNJ) Interconnection; Conowingo to Plymouth Meeting Transmission Line (Key No. 156601; PNJ Interconnection). The resource is a linear transmission line lying between the existing NHSL and the PA Turnpike, extending across the Turnpike along Hansen Access Road. This resource was part of the original APE for the Project, but was not identified as a potential historic resource during previous consultation, as it was thought to postdate 1975; however, new information indicates that it is more than 50 years old. The portion of the PNJ Interconnection in the APE is depicted on Figures 1a and 1b in Attachment A. This portion of the PNJ Interconnection has been evaluated and documented in the Historic Resources Survey Form (HRSF) attached, which includes a detailed site plan and keyed photographs (Attachment B).

The portion of the PNJ Interconnection lying within the modified APE is eligible for listing in the National Register of Historic Places (NRHP) as a contributing portion of the larger PNJ Interconnection, a 210-mile ring of high-voltage transmission lines constructed in the 1920s to service PA and NJ (Attachment A, Figures 1a and 1b and 3; Attachment B).

Assessment of Effects for Historic Architecture

Previously Evaluated Resources

The 2016 *Determination of Effects Memorandum* concluded that the Project would have **no adverse effect** on three properties: Pennsylvania Turnpike: Delaware River Extension (Key No. 155679), Philadelphia and Western Railway (NHSL) (Key No. 128825), and American Baptist Churches USA Mission Center (Key No. 203535). The 2016 *Determination of Effects Memorandum* also concluded that the Project would result in a finding of **no historic properties affected** on the Market Street Elevated Railway Historic District (Key No. 105499) and 69th Street Terminal Square Shopping District (Key No. 156448). The SHPO concurred with this finding on March 16, 2017.

The Definition of Effect/Criteria of Adverse Effect were applied to the same properties in light of the recent design refinements and proposed replacement of existing transmission towers, as all five properties remain within the modified APE (see Attachment C, Table 1). For the first two properties, the findings reported in the 2016 *Determination of Effects Memorandum* continue to apply because the Project would not alter, directly or indirectly, any of the characteristics of the

property that qualify the property for inclusion in the NRHP in a manner that would diminish the integrity of the property. For these reasons, FTA finds no change to the **no adverse effect** determinations for these resources:

- Pennsylvania Turnpike: Delaware River Extension (Key No. 155679) – The Project will run along the north side of the resource for approximately 2,600 feet before crossing the resource where the existing DeKalb Pike crosses the resource. See Tables 2 and 3 in Attachment C.
- Philadelphia and Western Railway (NHSL) (Key No. 128825) – The design refinement expanded the limit of disturbance of the Project to widen the existing NHSL embankment to accommodate the Project track interconnection with the existing NHSL tracks. See Tables 4 and 5 in Attachment C.

For the American Baptist Churches USA Mission Center, the no adverse effect finding formerly determined for the property stemmed from the need to take some land due to the location of the westernmost components of the Project. Under the refined design, no land takes would be necessary, due to shifting the Project further to the north and outside the property boundary. For this reason, FTA finds the project will result in **no historic properties affected** for this property.

- American Baptist Churches USA Mission Center (Key No. 203535) – The design refinement shifted the Project to the north side of First Avenue. The Project will no longer require land from the resource. See Table 6 in Attachment C.

For the last two resources, the design refinements at the 69th Street Transportation Center would occur in and adjacent to a modern extension of the Transportation Center building, and would not be visible from these two adjacent historic districts. No work would occur within the NRHP boundary of the historic districts. For each resource, the findings reported in the 2016 *Determination of Effects Memorandum* continue to apply because the Project would not alter the characteristics of the historic property qualifying it for inclusion in or eligibility for the NRHP. For these reasons, FTA finds no change to the determination of **no historic properties affected** for these resources:

- Market Street Elevated Railway Historic District (Key No. 105499) (Table 7 in Attachment C).
- 69th Street Terminal Square Shopping District (Key No. 156448) (Table 8 in Attachment C).

Newly Identified Resources

As discussed above, one new historic resource was identified in the modified APE: the PNJ Interconnection. The portion of the PNJ Interconnection in the APE has seven pairs of steel lattice towers (approximately 65 to 85 feet tall) that carry the electric conductor cables (circuits) along the PECO transmission corridor. As previously mentioned, conceptual engineering study identified the need to replace at least four of the towers at the eastern end of the resource to address potentially insufficient vertical clearance between the proposed track and the electric circuits. The extant 14 towers are shown on Figures 1a and 1b in Attachment A; the four towers coded in red in Figure 1a will be replaced, while the three towers coded in yellow in Figure 1a may also require replacement, depending on further study during subsequent Project design. SEPTA determined that adequate vertical clearance cannot be achieved by changing the elevation of the track. This is because the elevation of the proposed tracks is constrained by vertical clearance requirements over Henderson Road. It is not feasible to lower the track elevation within the transmission line corridor, and then increase the track grade to achieve vertical clearance requirements over Henderson Road.

The only feasible way to increase vertical clearance is to raise the existing electric transmission circuits. In the existing condition, the electric circuits are attached to the top horizontal arms of the existing towers; thus, the circuits cannot be raised higher on the existing towers. The towers will need to be replaced with taller towers in order to raise the electric circuits to a sufficient height for the Project to have sufficient clearance beneath them. SEPTA coordinated with PECO regarding tower replacement and identified monopoles as the type of structure PECO now uses for tower replacement; in-kind replacement is not possible. Conceptual engineering study indicates the monopoles would be approximately 125 to 160 feet tall depending on location and terrain. Monopoles have different spacing requirements than the existing steel lattice towers; as such, the number and locations of monopoles used as replacement structures may differ from the current number and locations of the steel lattice towers. PECO will be responsible for the design of the tower replacement that is required to implement the Project, and SEPTA will continue to coordinate with PECO during subsequent Project design.

The Definition of Effect and Criteria of Adverse Effect were applied to the PNJ Interconnection in Tables 9 and 10 in Attachment C. The Project may result in an **adverse effect** to the PNJ Interconnection because the Project will physically remove towers that are contributing elements to the resource, thereby diminishing the historic integrity of the historic property (Attachment C, Tables 1 and 10). However, despite these alterations, the PNJ Interconnection; Conowingo to Plymouth Meeting Transmission Line will functionally continue to serve its original purpose as a feeder of the PNJ Interconnection system and will continue to contribute to the overall significance of the resource.

Resolution of Adverse Effects

PECO will be responsible for the design and construction of tower replacement, and SEPTA will continue to coordinate with PECO as tower design progresses. FTA will notify the Advisory Council on Historic Preservation (ACHP) of the adverse effect finding, and is preparing a Memorandum of Agreement (MOA) among FTA, SEPTA, and the PA SHPO. The MOA will stipulate any minimization and mitigation measures agreed upon to resolve adverse effects resulting from replacement of towers that contribute to the NRHP-eligible PNJ Interconnection. FTA and SHPO previously discussed providing GIS mapping of the PNJ Interconnection: Conowingo to Plymouth Meeting Transmission Line for integration into PA SHPO's Cultural Resources Geographic Information System (CRGIS) as potential mitigation for the resolution of adverse effects. SEPTA and FTA are investigating this as a possibility and will consider other suggestions for potential mitigation received in a timely manner.

Archaeology

During initial Section 106 consultation for the Project, an APE for archaeology was defined as being the proposed limit of temporary and permanent land disturbance (May 2016 *Phase 1A Archaeological Survey Report for King of Prussia Rail Extension*, prepared by AECOM). On March 7, 2016, the SHPO concurred with the APE for archaeology.

The design refinements are generally within the previously studied APE for archaeology, but because of design shifts, some portions extend beyond the previously studied APE. The original APE for archaeology was modified in the areas of the design refinements to encompass permanent and temporary limits of disturbance. Figure 5 in Attachment A shows the previous and modified APEs for archaeology.

Probability for Archaeology - The *Phase 1A Archaeological Survey* concluded by stating that the previously studied APE for archaeology has been subjected to an extensive amount of prior grading, development, and other types of ground disturbance; as a result, additional archaeological investigation of the APE for archaeology is not recommended. The SHPO concurred with this finding on December 15, 2016.

Archaeologists examined the modified APE to determine archaeological sensitivity and probability of encountering intact belowground resources. Based on the comprehensive nature of prior earthmoving activities, archaeologists concluded that the modified APE for archaeology has a low sensitivity for prehistoric and historic archaeological resources. FTA finds that the findings of the *Phase 1A Archaeological Survey* apply to the modified APE for archaeology, and there is no need for additional evaluation of the modified APE for archaeology.

Consulting Party Coordination

In accordance with 36 CFR 800.1(c)(2), FTA and SEPTA identified parties that may be interested in reviewing and commenting on the proposed Project and FTA's findings. The following individuals/organizations are copied on this letter, as invitation to participate/continue to participate as Section 106 consulting parties: King of Prussia Historical Society; Historical Society of Montgomery County; Montgomery County Division of Parks, Trails and Historic Sites; Montgomery County Planning Commission; Upper Merion Planning Commission; Upper Darby Township; and PECO. The identified consulting parties are invited at this time to provide comment on the identification of historic properties and effects of the project on historic properties as presented in this letter and enclosures, and comment on or propose alternative ideas for mitigation measures to resolve adverse effects.

Parties wishing to participate in the Section 106 consultation process should notify Mr. Timothy Lidiak, FTA Community Planner, of their interest by November 2, 2020; his contact information is listed below.

Request for SHPO Concurrence

FTA seeks comment on the proposed modified architectural and archaeological APEs, identification of historic properties, and evaluation of effects. FTA also requests PA SHPO's concurrence with the following findings:

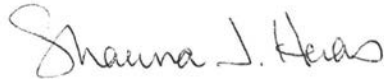
1. The determination of the PNJ Interconnection; Conowingo to Plymouth Meeting Transmission Line (Key No. 156601) as **eligible** for listing in the NRHP as contributing to the PNJ Interconnection;
2. the determination that the undertaking will result in **no adverse effect** to the Pennsylvania Turnpike: Delaware River Extension (Key No. 155679) and the Philadelphia and Western Railway (NHSL) (Key No. 128825);
3. the determination that the undertaking will result in **no historic properties affected** for the American Baptist Churches USA Mission Center (Key No. 203535), Market Street Elevated Railway Historic District (Key No. 105499), and 69th Street Terminal Square Shopping District (Key No. 156448);

4. the determination that the undertaking may result in **adverse effects** to the PNJ Interconnection; Conowingo to Plymouth Meeting Transmission Line (Key No. 156601); and
5. the determination that no further evaluation of the modified APE for archaeology is necessary.

FTA requests that PA SHPO and consulting party responses be received within 15 calendar days, based on the review schedule previously discussed and agreed to by FTA, SEPTA, and PA SHPO. As this date falls on a weekend, FTA will accept responses received by November 2, 2020. Note that FTA is preparing a draft MOA for the PNJ Interconnection property, and delivery to PA SHPO for discussion is anticipated for October 26, 2020.

If you have any questions or comments, please contact Mr. Timothy Lidiak, Community Planner, at (215) 656-7084 or tim.lidiak@dot.gov.

Sincerely,

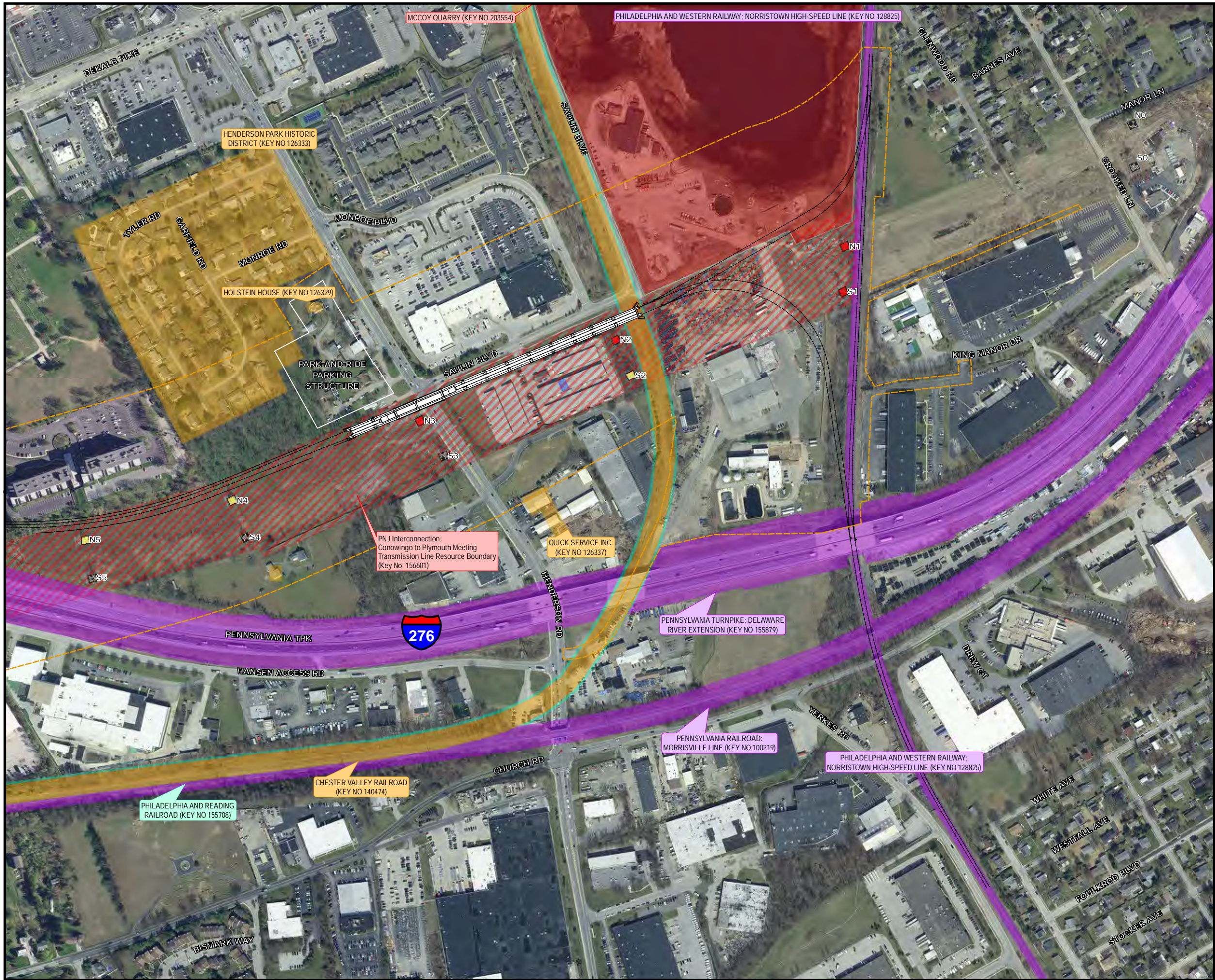


Shauna J. Haas
Environmental Protection Specialist

Attachments

cc: R. Judge (SEPTA)
M. Quinn (AECOM)
L. Roche (AECOM)
Mr. David Montalvo (KOP Historical Society)
Mr. Barry Rauhauser (Historical Society of Montgomery County)
Mr. David Clifford (Montgomery County Division of Parks, Trails and Historic Sites)
Mr. Scott France (Montgomery County Planning Commission)
Ms. Jacquelin Camp (Upper Merion Planning Commission)
Mr. Rob Loeper (Upper Merion Planning Commission)
Mr. Vincent Rongione, Esq. (Upper Darby Township)
Mr. Pete Kirlin (PECO)
Mr. John Halderman (PECO)

Attachment A: Figures



Preferred Alternative: Sheet: 1 of 4
KOP Rail FEIS

Historic Architectural Resource

Previously Identified

- Listed/Eligible
- Not Eligible
- Undetermined

Evaluated & Recommended

- Not Eligible
- Eligible
- Potentially Eligible

Modified APE for Historic Architecture

Proposed Improvements

- Aerial Structure
- Other Improvements
- Track Alignment
- PECO Tower
- PECO Tower - Possible Replace
- PECO Tower - Replace

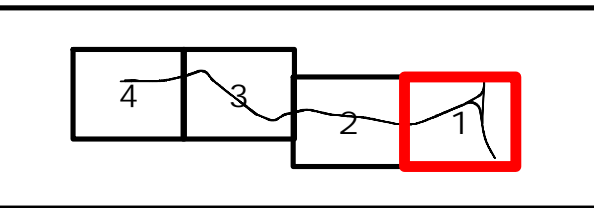
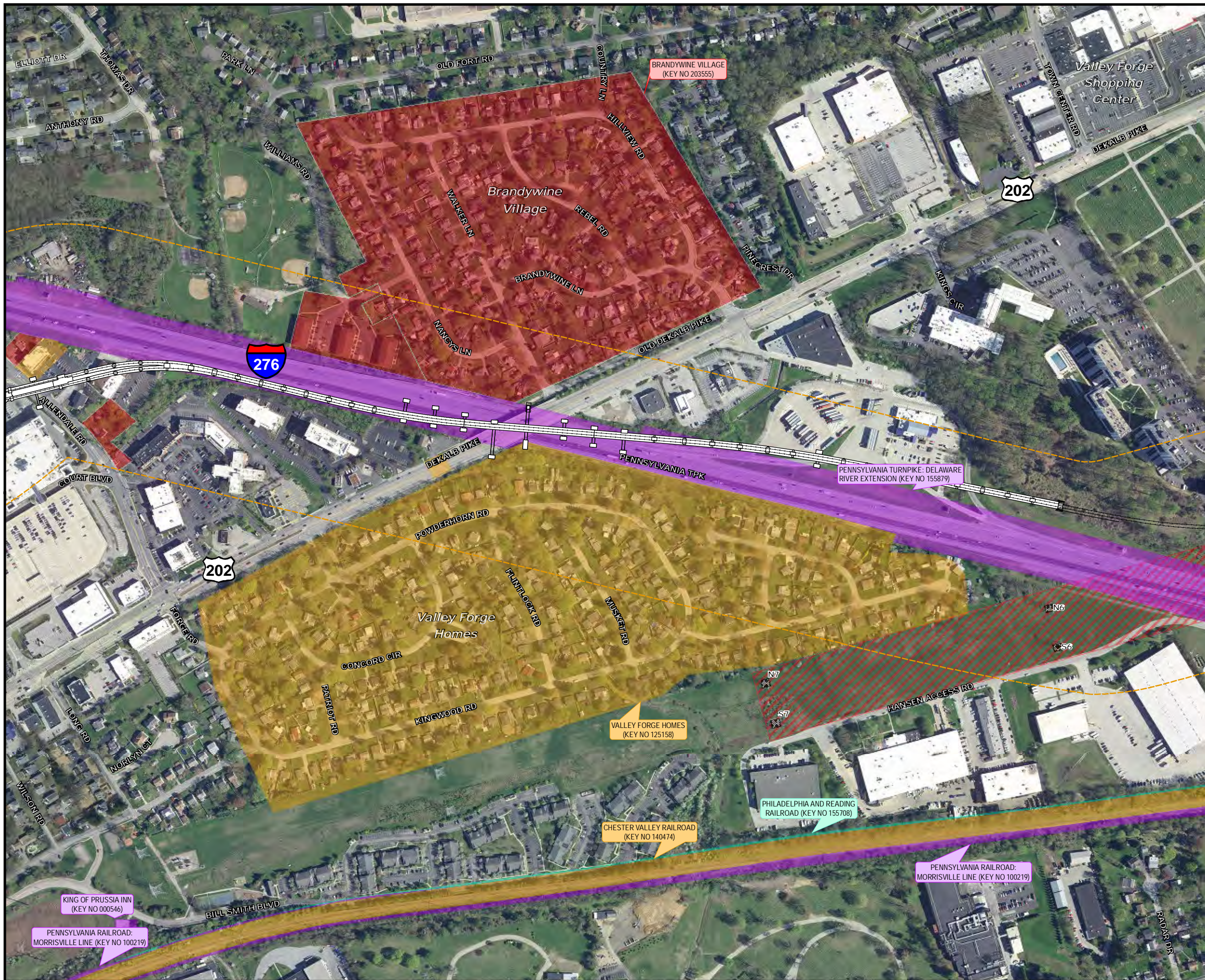





Figure 1a. KOP Rail Project: Preferred Alternative Plans.



Preferred Alternative: Sheet: 2 of 4
 KOP Rail FEIS

Historic Architectural Resource

Previously Identified





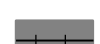

-  Listed/Eligible
-  Not Eligible
-  Undetermined

Evaluated & Recommended

-  Not Eligible
-  Eligible
-  Potentially Eligible

-  Modified APE for Historic Architecture

Proposed Improvements

-  Aerial Structure
-  Other Improvements
-  PECO Tower
-  PECO Tower - Possible Replace
-  Track Alignment
-  PECO Tower - Replace

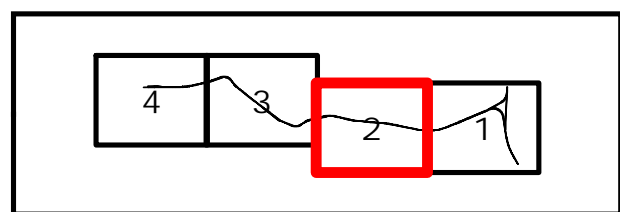
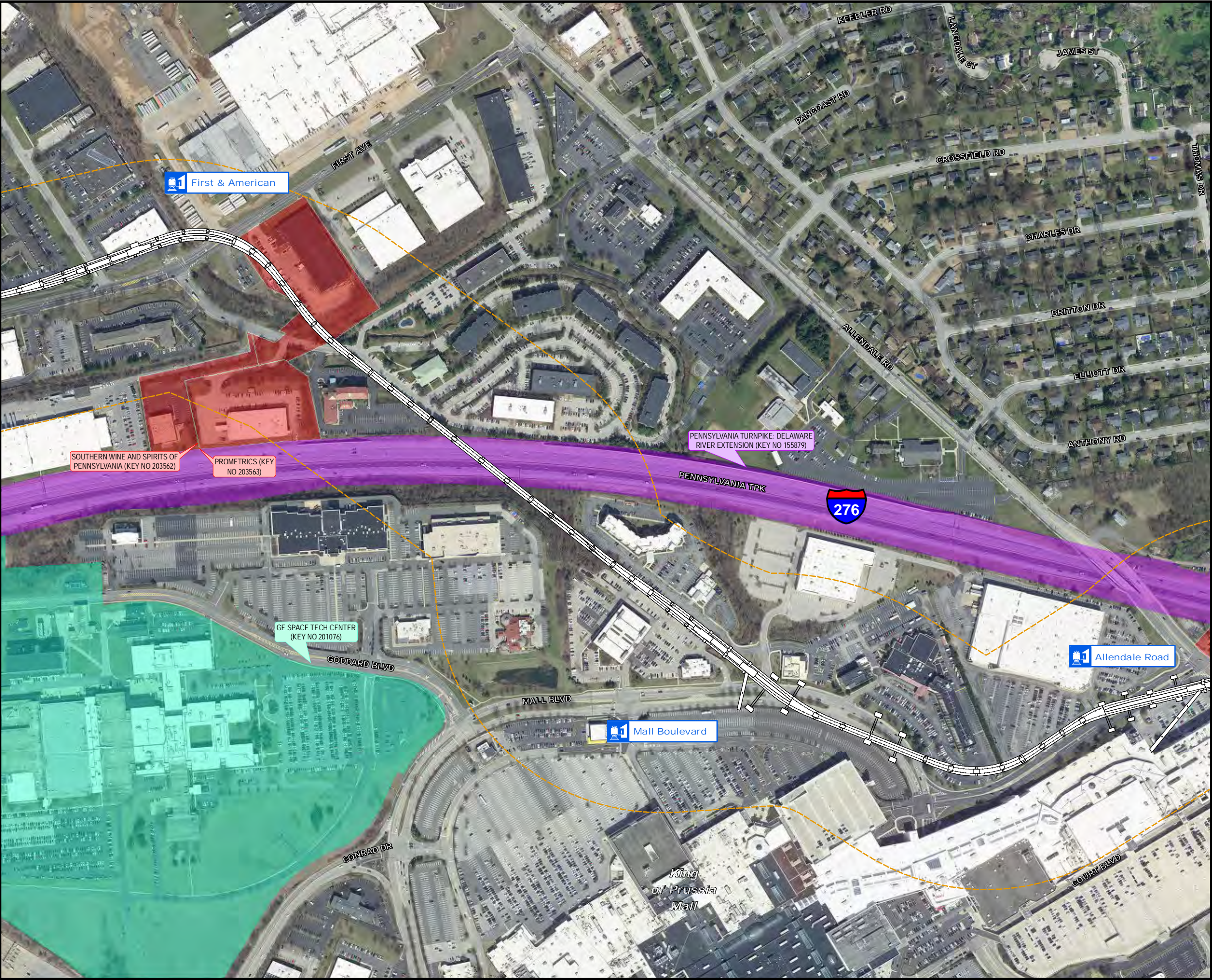


Figure 1b. KOP Rail Project: Preferred Alternative Plans.



Preferred Alternative: Sheet: 3 of 4
KOP Rail FEIS

Historic Architectural Resource

Previously Identified

- Listed/Eligible
- Not Eligible
- Undetermined

Evaluated & Recommended

- Not Eligible
- Eligible
- Potentially Eligible
- Modified APE for Historic Architecture

Proposed Improvements

- Aerial Structure
- Other Improvements
- Track Alignment
- PECO Tower
- PECO Tower - Possible Replace
- PECO Tower - Replace

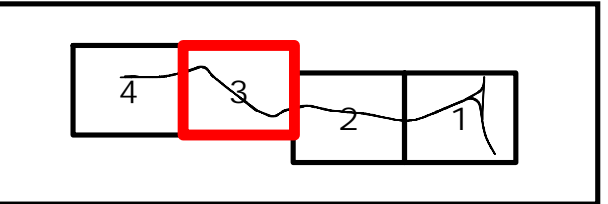
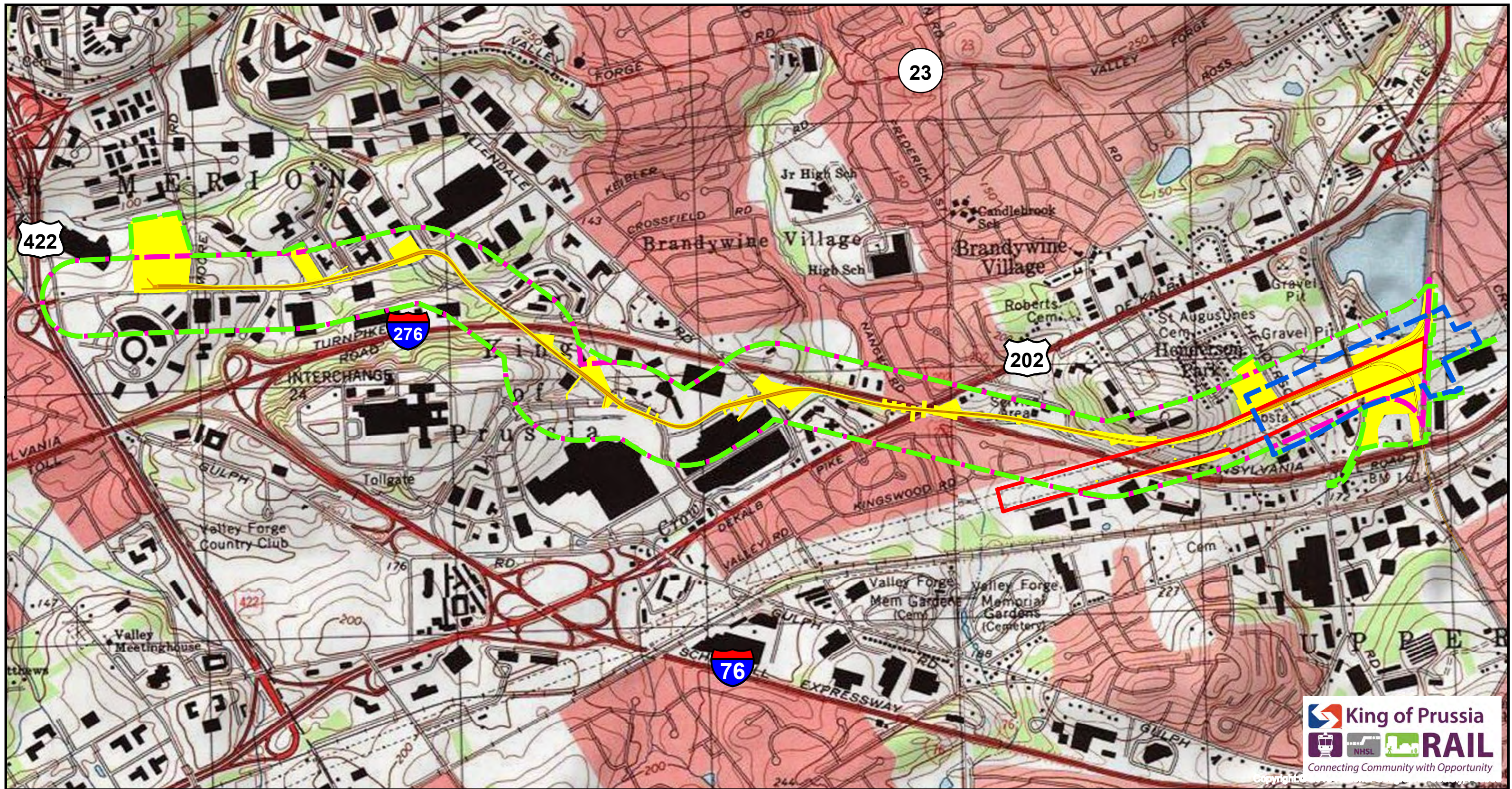
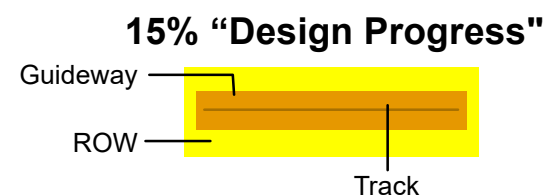


Figure 1c. KOP Rail Project: Preferred Alternative Plans.



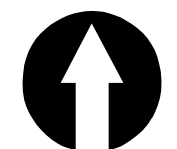
Preferred Alternative:
Previous and Modified APEs
for Historic Architecture

10/2/2020
Source: Upper Merion Twp, SEPTA, PASDA, DVRPC, AECOM.



- Modified APE for Historic Architecture
- Previous APE for Historic Architecture

- PECO Visual APE
- PNJ Interconnection; Conowingo to Plymouth Meeting Transmission Line Resource Boundary



AECOM

0 600 1,200
Feet

Figure 2. KOP Rail Project: Previous and Modified APEs for Historic Architecture.

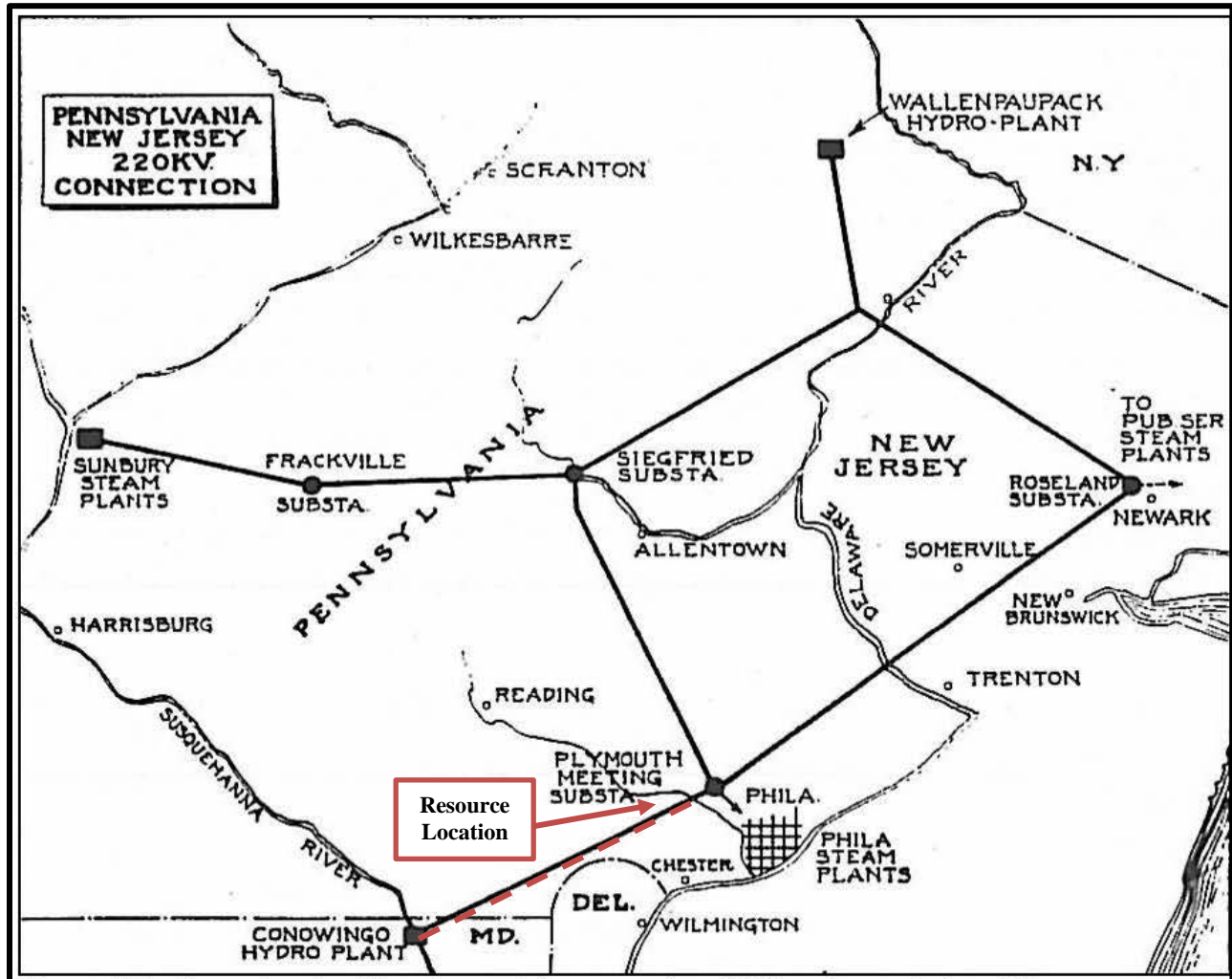
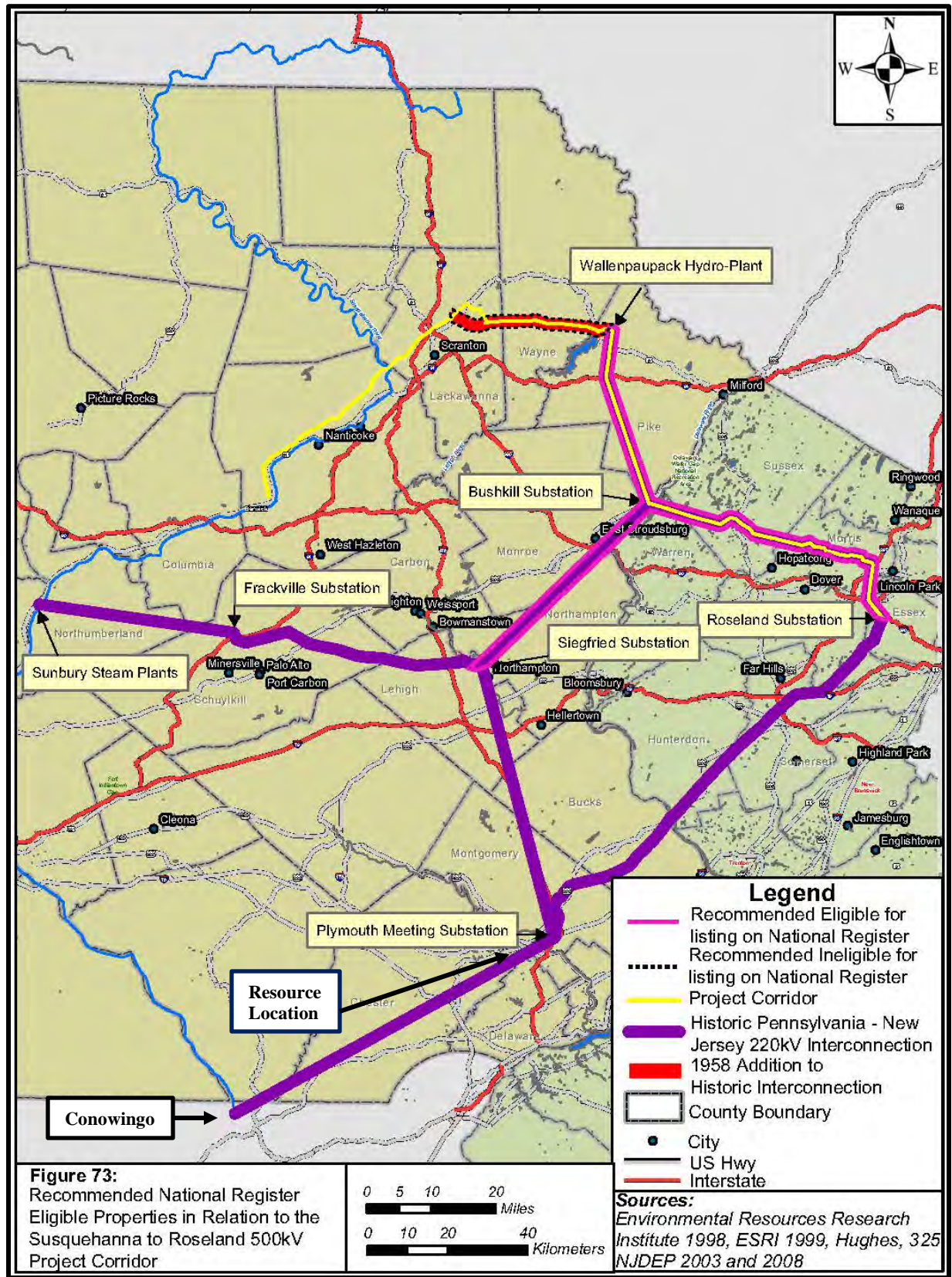
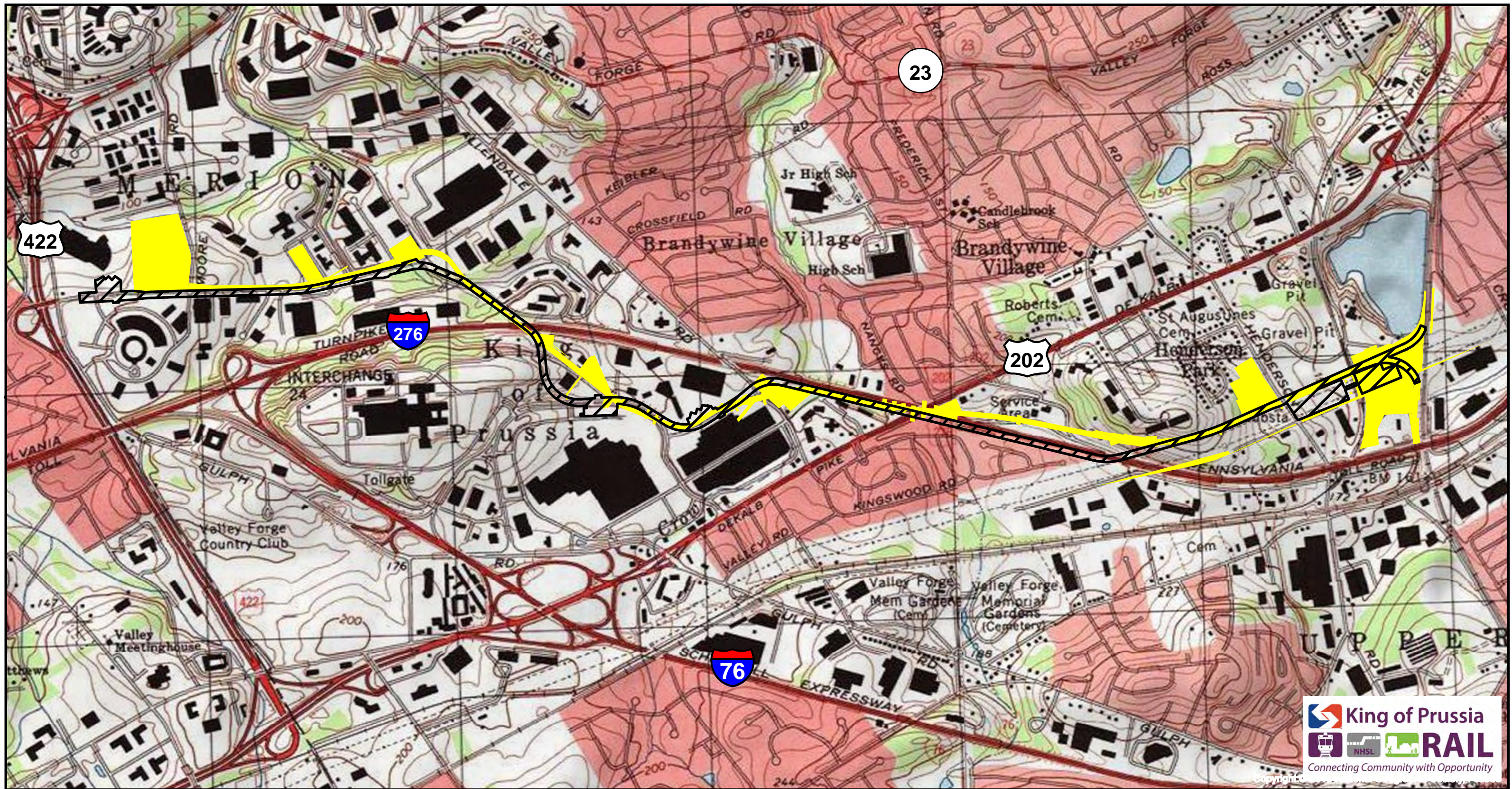


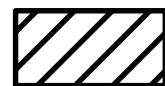

Figure 3. PNJ Interconnection Historical Map of Original System (Van Steen and McLane 2011:41). Markup shows location of PNJ Interconnection; Conowingo to Plymouth Meeting Transmission Line.






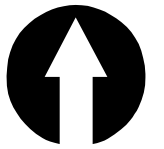
Preferred Alternative:
Previous and Modified APEs
for Archaeology

10/2/2020
Source: Upper Merion Twp, SEPTA, PASDA, DVRPC, AECOM.

-  Previous APE for Archaeology
-  Modified APE for Archaeology



King of Prussia
RAIL
Connecting Community with Opportunity



AECOM

0 600 1,200
Feet

Figure 5. KOP Rail Project: Previous and Modified APEs for Archaeology.

Attachment B: Historic Resource Survey Form

**PNJ Interconnection; Conowingo to Plymouth Meeting Transmission Line
(Key No. 156601)**

Historic Resource Survey Form

PENNSYLVANIA HISTORICAL AND MUSEUM COMMISSION
Bureau for Historic Preservation

Key # 156601

ER# 2013-1006-091

Date Prepared 09/30/2020

Name, Location and Ownership *(Items 1-6; see Instructions, page 4)*

HISTORIC NAME Pennsylvania - New Jersey (PNJ) Interconnection; Conowingo to Plymouth Meeting Transmission Line

CURRENT/Common NAME PECO Corridor

OWNER NAME/ADDRESS PECO, c/o Real Estate and Facilities, 2301 Market St., Philadelphia, PA 19103

TOTAL NUMBER OF RESOURCES 15

COUNTY Montgomery

MUNICIPALITY Upper Merion Township

USGS QUAD Norristown PA

LOCATION Extends between Norristown High Speed Line on the east and west end of Hansen Access Rd. on the west

STREET ADDRESS _____ ZIP 19406

CATEGORY OF PROPERTY ☐ Building ☒ District ☐ Object ☐ Site ☒ Structure

OWNERSHIP ☐ Private ☒ Corporate

☐ Public/Local ☐ Public/County ☐ Public/State ☐ Public/Federal

TAX PARCEL #/YEAR Multiple

Function *(Items 7-8; see Instructions, pages 4-6)*

Historic Function

Industry/Processing/Extracting

Subcategory

Industry/Processing/Extract - Energy Facility

Particular Type

Transmission Line

Current Function

Industry/Processing/Extracting

Subcategory

Industry/Processing/Extract - Energy Facility

Particular Type

Transmission Line

Property Features *(Items 15-17; see Instructions, pages 7-8)*

Setting Industrial; commercial; suburban

Ancillary Features

Transmission Towers

Access road

Conductors

Insulators

Acreage (round to nearest tenth) 45.5

Architectural/Property Information (Items 9-14; see Instructions, pages 6-7)**ARCHITECTURAL CLASSIFICATION**No Classification

_____**EXTERIOR MATERIALS and STRUCTURAL SYSTEM**

Foundation	Steel	Concrete
Walls	_____	_____
Roof	_____	_____
Other	Steel	_____
Structural System	Steel Frame	_____

WIDTH _____ (feet) or _____ (# bays) **DEPTH** _____ (feet) or _____ (# rooms) **STORIES/HEIGHT** _____
Historical Information (Items 18-21; see Instructions, page 8)Year Construction Began 1926 ☐ Circa Year Completed 1928 ☐ CircaDate of Major Additions, Alterations _____ ☐ Circa _____ ☐ Circa _____ ☐ CircaBasis for Dating ☒ Documentary ☐ PhysicalExplain Dating is based on documentary research and historic photographs/aerial views.Cultural/Ethnic Affiliation(s) N/AAssociated Individual(s) N/AAssociated Event(s) N/AArchitect(s) Day & ZimmermanBuilder(s) Day & Zimmerman**Submission Information** (Items 22-23; see Instructions, page 8)Previous Survey/Determinations PNJ Interconnection; Wallenpaupack to Siegfried sector (2011)/EligibleThreats ☐ None ☐ Neglect ☒ Public Development ☐ Private Development ☐ OtherExplain Resource is in the APE of the SEPTA King of Prussia Rail Project

This submission is related to a ☐ non-profit grant application ☐ business tax incentive

☒ NHPA/PA History Code Project Review ☐ other

Preparer Information (Items 24-30; see Instructions, page 9)Name & Title Katherine Farnham (Sr. Architectural Historian) and Samuel A. Pickard, Jr. (Historian)Date Surveyed October 2, 2020 Project Name SEPTA King of Prussia Rail ProjectOrganization/Company AECOMMailing Address 625 W. Ridge Pike, Suite E-100, Conshohocken, PA 19428Phone (610) 234-0420Email katherine.farnham@aecom.com

National Register Evaluation *(Item 31; see Instructions, page 9)*
(To be completed by Survey Director, Agency Consultant, or for Project Reviews ONLY.)☐ Not Eligible (due to ☐ lack of significance and/or ☐ lack of integrity)☐ Eligible Area(s) of Significance _____

Criteria Considerations _____ Period of Significance _____

☒ Contributes to Potential or Eligible District District Name Pennsylvania-New Jersey (PNJ) Interconnection;
Wallenpaupack to Siegfried Transmission Line**Bibliography** *(Item 32; cite major references consulted. Attach additional page if needed. See Instructions, page 9.)*

See Continuation Sheet

Additional Information

The following must be submitted with form. Check the appropriate box as each piece is completed and attach to form with paperclip.

- ☒ Narrative Sheets—Description/Integrity and History/Significance (See Instructions, pages 13-14)
- ☒ Current Photos (See Instructions, page 10)
- ☒ Photo List (See Instructions, page 11)
- ☒ Site Map (sketch site map on 8.5x11 page; include North arrow, approximate scale; label all resources, street names, and geographic features; show exterior photo locations; See Instructions, page 11)
- ☐ Floor Plan (sketch main building plans on 8.5x11 page; include North arrow, scale bar or length/width dimensions; label rooms; show interior photo locations; See Instructions, page 11)
- ☒ USGS Map (submit original, photocopy, or download ; See Instructions, page)

Send Completed Form and Additional Information to:

National Register Program
Bureau for Historic Preservation/PHMC
Keystone Bldg., 2nd Floor
400 North St.
Harrisburg, PA 17120-0093

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1992a *Norristown, PA*. Topographic 7.5-minute quadrangle. USGS, Reston, Virginia.

1992b *Valley Forge, PA*. Topographic 7.5-minute quadrangle. USGS, Reston, Virginia.

Van Steen, Deborah, and Abbie Hurlbut

2011 Pennsylvania—New Jersey (PNJ) Interconnection; Wallenpaupack to Siegfried Transmission Line. Historic Resource Survey Form. BHP Key # 156601. ER# 09-0592-042-II. On file at the Pennsylvania State Historic Preservation Office, Harrisburg, Pennsylvania.

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2011 *Historic Corridor Report, Susquehanna to Roseland 500kV Transmission Project, PA-NJ Interconnection: Wallenpaupack to Siegfried and Bushkill to Roseland*. Prepared for PPL Electric Utilities Corporation, Allentown, Pennsylvania and Public Service Electric & Gas Company, Newark, New Jersey, by the Louis Berger Group, Morristown, New Jersey.

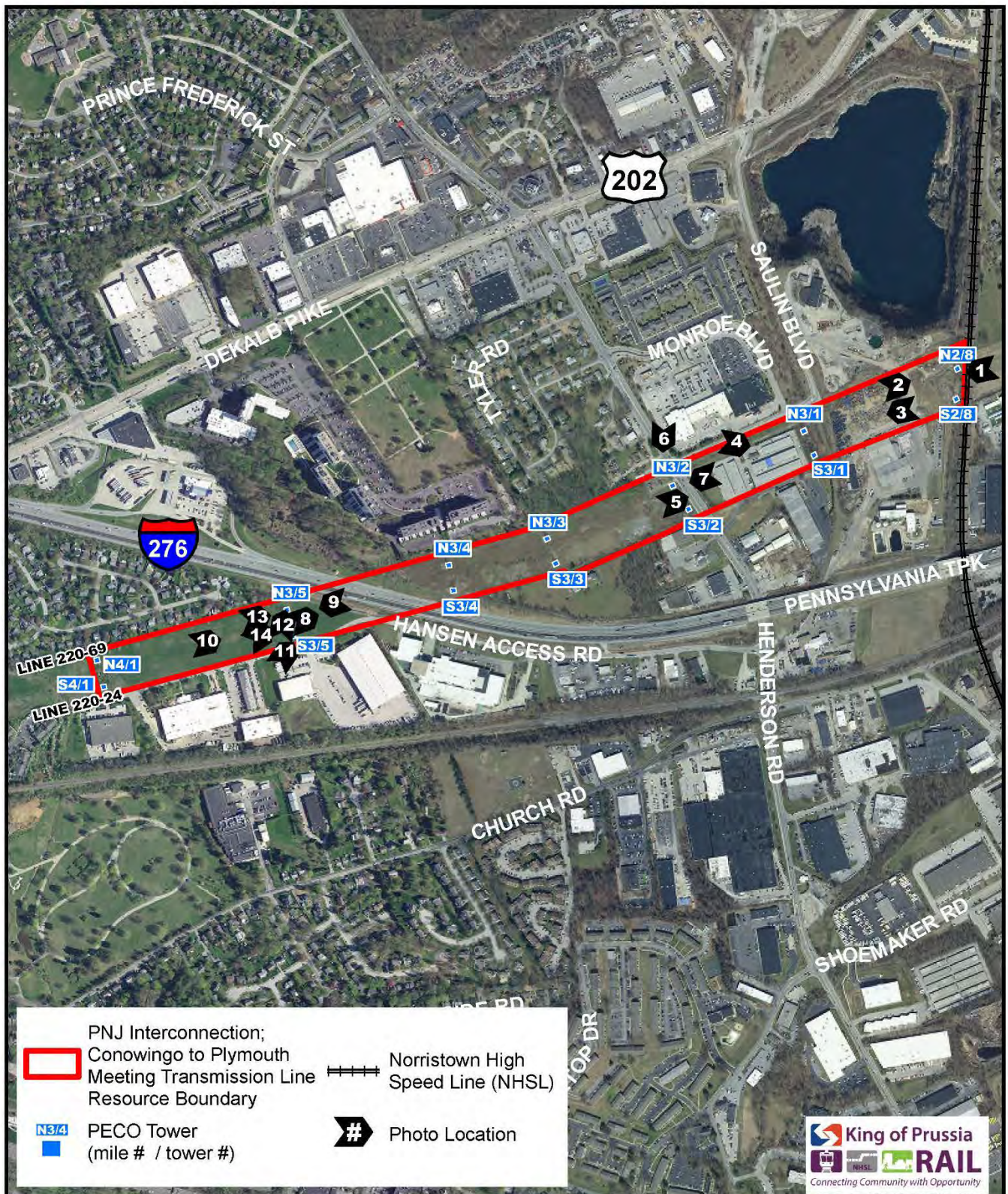
Wainwright, Nicholas B.

1961 *History of the Philadelphia Electric Company, 1881-1961*. Philadelphia Electric Company, Philadelphia, Pennsylvania.

Photo List (Item 33)Photographer name Katherine FarnhamDate 9/14/2020Location Negatives/Electronic Images Stored AECOM, 625 W. Ridge Pike, Suite E-100, Conshohocken, PA 19428

Photo #	Photo Subject/Description	Camera Facing
1	PNJ Interconnection; Conowingo to Plymouth Meeting Transmission Line. East end of resource; view looking southwest across NHSL from PECO ROW at Crooked Lane.	SW
2	View looking northeast from Republic Services toward easternmost tower pair 2/8.	NE
3	Transmission corridor looking southwest from Republic Services property toward tower pair 3/1.	SW
4	View looking east from Saulin Blvd. vicinity; tower pair 3/1 in foreground.	E
5	View looking northeast from Henderson Rd. showing tower pairs 3/1 (front) and 2/5 (at rear).	NE
6	Side view of tower pair 3/2 at Henderson Rd., view to south.	S
7	View to southwest up steep hill from Henderson Rd.; tower 3/2 at right. Note access road entrance at center and small electrical yard behind tower.	SW
8	Tower pairs 3/4 in foreground and 3/3 in background, view to northeast across the PA Turnpike.	NE
9	View of west end of resource looking southwest along Hansen Access Rd. above the PA Turnpike.	SW
10	View from west end of resource looking northeast across the PA Turnpike.	NE
11	South tower in 3/5 pair showing oblique view with typical details; view to northeast.	NE
12	North tower in 3/5 pair showing side view with typical details, view to northeast.	N
13	Upward detail view to northeast of upper part of north tower in 3/5 pair, showing typical arrangement of three conductors with vertical insulator strings, and two grounding wires at top.	NE
14	Detail of southwest anchor foot of north tower in 3/5 pair, view to northeast.	NE
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Site Plan (Item 34)

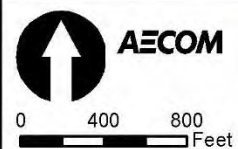


Pennsylvania-New Jersey (PNJ)
Interconnection;
Conowingo to Plymouth Meeting
Transmission Line

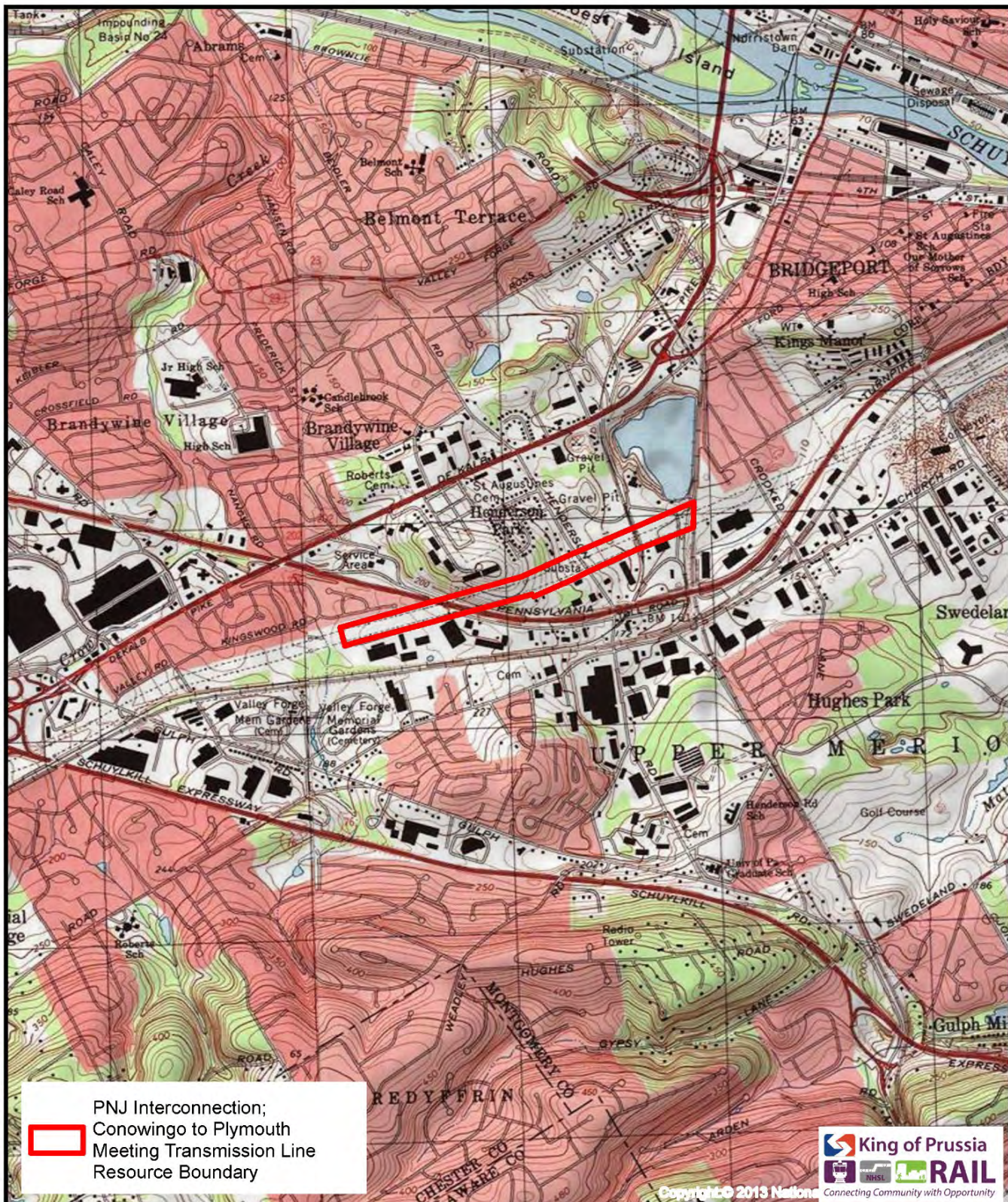
Source: Upper Merion Twp, SEPTA, PASDA, DVRPC, AECOM

Norristown High Speed Line to
West End of Hansen Access Road
Upper Merion Township
Montgomery County
PA SHPO Key No. 156601

10/1/2020



USGS Map (Item 36)

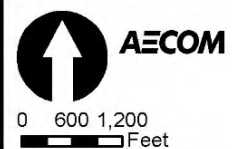


**Pennsylvania-New Jersey (PNJ)
Interconnection;
Conowingo to Plymouth Meeting
Transmission Line**

Source: Copyright © 2013 National Geographic Society, i-cubed. USGS Valley Forge, PA and Norristown, PA Quad Maps.

Norristown High Speed Line to
West End of Hansen Access Road
Upper Merion Township
Montgomery County
PA SHPO Key No. 156601

10/1/2020



Physical Description and Integrity (Item 38)

Introduction:

This resource is documented as an additional sector of the previously recorded Pennsylvania-New Jersey (PNJ) Interconnection; Wallenpaupack to Siegfried Transmission Line (Key No. 156601), which was recorded in a Historic Resources Survey Form (HRSF) and corridor report in 2011 for the Susquehanna to Roseland 500kV Project (Van Steen and Hurlbut 2011; Van Steen and McLane 2011). The line was determined eligible for the National Register of Historic Places (NRHP) in 2011 (MacDonald 2011). The PNJ Interconnection is a 210-mile ring-shaped high-voltage transmission system built to service Pennsylvania and New Jersey and completed in 1928 (Figures 1 and 2). The system was originally fed by three generation plants: a hydroelectric plant at Lake Wallenpaupack, PA; a hydroelectric plant on the Susquehanna River at Conowingo, MD; and a steam plant facility at Sunbury, PA. The plants fed into substations located at Siegfried and Plymouth Meeting, PA and Roseland, NJ. From the substations, power was fed into the overall grid. The Susquehanna to Roseland 500kV Project documented the northernmost PNJ Interconnection sectors, i.e. those connecting the Wallenpaupack Hydroelectric Plant with the Siegfried, Bushkill, and Roseland Substations. The PNJ Interconnection plants, substations, and transmission lines were designed and built by three regional utility companies, Pennsylvania Power & Light Company (PP&L), the Philadelphia Electric Company (PECO), and Public Service Electric & Gas Company (PSE&G) of New Jersey. The sectors documented in 2011, which spanned both Pennsylvania and New Jersey, were constructed by PP&L and PSE&G. Other sectors of the PNJ Interconnection system, including the sectors built by PECO, were referenced in the PNJ Interconnection HRSF, but not identified or mapped in the Pennsylvania Historic Preservation Office (PA SHPO) CRGIS system.

The subject resource is a 220kV transmission line constructed and owned by the Philadelphia Electric Company (PECO), now known as PECO Energy Company. Completed in 1928, it is part of an original sector of the PNJ Interconnection system, connecting the Conowingo Hydroelectric Power Station on the Susquehanna River in Maryland to the Plymouth Meeting Substation. Power from the plant is directed in a northeasterly direction over approximately 60 miles of transmission lines through Cecil County, Maryland and Chester and Montgomery Counties, Pennsylvania to the Plymouth Meeting Substation. From Plymouth Meeting, Conowingo power flows into the Interconnection via the two southernmost transmission sectors in the ring-shaped system: the Plymouth Meeting to Siegfried (PA) sector, which was built by PECO and runs roughly northwest from Plymouth Meeting to Siegfried, and the Plymouth Meeting to Roseland (NJ) sector, which runs roughly northeast across the Delaware River into central New Jersey. PECO constructed and owns the Plymouth Meeting to Roseland sector between Plymouth Meeting and the Delaware River, while PSE&G constructed and owns the portion between the Delaware River and Roseland. A portion of the electricity generated at Conowingo is also directed from the Plymouth Meeting Substation toward Philadelphia via a lower-voltage 66kV transmission line.

Resource Boundary:

The subject resource consists of two parallel lines of conductors supported by steel-lattice transmission towers, with towers arrayed in corresponding pairs and numbered by mile and station (3/1, 3/2, etc.). The overall transmission line sector, of which the subject resource is a small portion, is approximately 60 miles long, including hundreds of towers bookended by a massive generating plant and a substation and passing through two states and three counties. Documentation and evaluation of the PNJ Interconnection; Conowingo to Plymouth Meeting Transmission Line is being undertaken due to a small portion of the line falling inside the APE of the SEPTA King of Prussia Rail Project.

Previous guidance on documentation and evaluation of transmission lines is limited, but was consulted to aid in developing an appropriate boundary for the resource. Due to the massive geographic span and complex nature of transmission line systems, prior guidance recommends treating transmission lines as a historic district, in which component structures may not be individually distinctive or eligible, but contribute to the significance of the overall resource (Adams 2010: 20; Van Steen and Hurlbut 2011:59).

In addition, guidance developed for evaluating historic transmission lines in California states:

Generally, the boundaries of an electric transmission structure and its associated system will include the power station, or substation, and all the structures in the transmission line system from the station to the end. In many cases, an entire system will only be evaluated if the project or undertaking involves changes made to the entire system and each component thereof. If a single or small number of electric transmission structures fall in the

APE of a given project or undertaking, then the boundary should only include those structures as well as a sample of other structures in that system that are outside of the established boundary for comparison. The boundary should also include associated features that contribute to the construction or maintenance of the structure, such as maintenance roads (Adams 2010:32-33).

Based upon the precedent of the previous PNJ Interconnection documentation, the width of the resource boundary corresponds to the linear PECO right-of-way, which in this area is approximately 350 feet wide. Given the overall length of the Conowingo to Plymouth Meeting corridor and the comparatively small portion within the SEPTA King of Prussia Rail Project APE, guidance suggests that documentation of the full corridor is not warranted. As such, a shorter-length resource boundary corresponding to the APE was determined based upon guidance for evaluating transmission lines. The length of the boundary spans slightly beyond the length of the PNJ Interconnection's overlap with the APE for the SEPTA King of Prussia Rail Project. In total, the boundary contains one access road and 14 transmission towers, 12 of which are inside the project APE. All 15 structures within the boundary contribute to the resource.

Resource Description:

The subject segment of the PNJ Interconnection is approximately 5,950 feet (1.1 mile) long and 350 feet wide (see Site Plan on p. 7 and USGS Map on p. 8). It extends west from the Norristown High-Speed Line (NHSL) across Henderson Road and the Pennsylvania Turnpike, and terminates at tower pair 4/1 near the west end of Hansen Access Road. The landscape over which the PNJ Interconnection traverses between the NHSL and Henderson Road is heavily developed with industrial and commercial properties, including a quarry, recycling plant, and self-storage complex. Modern buildings and parking lots occupy some of the PNJ Interconnection's right-of-way below the transmission line between the NHSL and Henderson Road (Photographs 1-6). West of Henderson Road, the PNJ Interconnection corridor climbs a steep brush-covered hill, and then descends gradually across the Pennsylvania Turnpike, which is in a cut on a southeast-northwest trajectory at this location. Modern apartment towers line the crest of the hill overlooking the PNJ Interconnection corridor east of the Turnpike. On the west side of the Turnpike, the resource passes across open mown grass and runs along the north side of Hansen Access Road, which has industrial/office parks along its south side. The Valley Forge Homes neighborhood is located to the north between the PNJ Interconnection corridor and the Turnpike. Throughout the corridor, most tall vegetation has been cleared but the tower bases are surrounded by brush and shrubs in most places (Photographs 7-10). One access road is extant and contributes to the resource; it is an unpaved track leading from the west side of Henderson Road uphill to the west (Photograph 7).

The 14 transmission towers within the resource boundary are standardized four-legged steel lattice structures which are approximately 85' in height. They are constructed of individual girders of rolled steel, cross-braced and attached with bolts in a manner similar to steel truss bridges, and painted silver-gray. Due to their large size, towers of this type could not be transported as a full structure, and were typically manufactured in smaller pieces and assembled onsite (Hayes 2005:235). The towers have a roughly X-shaped profile as viewed from the front or back, with a narrow "waist" and a horizontal crossbar at the top of the X (Photographs 11-12). From the side, they have a "trident" profile (Photographs 6 and 12). Each line of towers carries a trio of 220kV conductors (power lines). Three conductors are suspended from the base from each tower's crossbar by a vertical strand of 14 insulators (Photograph 13). Two thin grounding wires are attached to the top of each tower, aligned above the space between the center conductor and the flanking conductors. The tower legs bear applied yellow-and-black identification number stickers and are anchored into the ground with underground spread steel grillages embedded in concrete (Photograph 14). Only steel components of the footings were visible in the field; concrete components appear to be well below grade with vegetation growing over them.

Integrity:

The earliest available historic aerial views for this area, dating from 1942, indicate that steel lattice transmission towers were located on the exact sites of the extant towers. Based on 1931 historic photographs of other PECO-built towers in the original system (Van Steen and Hurlbut 2011:13-14), the extant towers appear to be original infrastructure, as they match one of the standard PECO designs used in the original construction (Figure 3). No evidence has been uncovered to indicate that the towers were rebuilt or moved in subsequent years, or that the number of connectors has changed. The resource thus

retains integrity of location, design, materials, and workmanship. The transmission line lacks integrity of setting due to the intense suburbanization and industrial development that occurred in this part of Upper Merion Township following World War II, which also included construction of the Delaware River Extension of the Pennsylvania Turnpike (I-276) through the PECO right-of-way in the 1950s. Despite changes to the surrounding area, the positioning and height of the dual tower pairs and the cleared space in the ROW between them is a characteristic landscape feature of the line that appears to have been retained from early on, and as such the resource retains integrity of feeling. Documentary research clearly indicates that the transmission line resource is associated with the 1926-1928 development of the Conowingo Hydroelectric Plant, Plymouth Meeting Substation, and the overall PNJ Interconnection; thus, the resource retains integrity of association.

The previous HRSF noted the conductors for the Wallenpaupack to Siegfried and Bushkill to Roseland sectors of the PNJ Interconnection were upgraded from 220kV to 230kV in 1965, and new ground wires were added in 1972. It is likely that similar alterations have been made to the Conowingo to Plymouth Meeting sector of the PNJ Interconnection, although documentary records of such have not been located. However, the authors note that “These upgrades are considered an infrastructure modification that are (sic) necessary in order for the utility to evolve in response to modern technological advancements and to continue to serve its vital function. Modifications, such as replacement of wires, brackets, ground wires, and similar fixtures are not considered significant alterations to the resource and, therefore, do not detract from the integrity of the corridor” (Van Steen and Hurlbut 2011:59).

History and Significance (Item 39)

History of PECO and its Role in the PNJ Interconnection:

The history of PECO, which constructed the subject sector, is an addendum to the extensive historic context provided in the PNJ Interconnection; Wallenpaupack to Siegfried Transmission Line HRSF prepared in 2011. This historic overview is intended to provide additional information on PECO's history and role in the development of the PNJ Interconnection, to aid in evaluating the significance of the subject sector, given that little specific information on the PECO-built sectors was provided in the earlier documentation.

The Philadelphia Electric Company (PECO) was formed in 1902 to consolidate the various electric power companies operating in Philadelphia. The company was unable to produce enough power to meet demand, so in 1903 it opened Schuylkill Station A at 28th and Christian Streets in South Philadelphia with a 5000-kW alternator. By 1915, this power station, upgraded to 81,000 kW, had been joined by a second, 65,000 kW station. Demand for power continued to grow and again pushed the system to capacity in the years immediately following World War I. The industrial and commercial demand for power was rapidly increasing, as was that by transportation companies. The Philadelphia Rapid Transit Company's (PRT) system had used PECO's power since 1910, and starting in 1915, the Pennsylvania Railroad began electrifying its commuter lines. Additionally, the 1920s saw a rapid growth in the number and use of electrical appliances in the domestic sphere (Geasey 1995:134-135).

In the late 1910s and first half of the 1920s, PECO opened and then quickly expanded three power stations—Chester, Delaware, and Richmond. Despite this, there was often not enough capacity to handle peak loads and no reserve capacity. Even when able to meet demand, the steam power stations were dependent on a steady supply of coal, which not only presented an additional expense but could be interrupted by striking miners, as it was in 1919. The potential solution to this issue was found via hydroelectric generation on the Susquehanna River (Geasey 1995:135-136).

A hydroelectric dam on the Susquehanna at Holtwood, Pennsylvania had been constructed in 1910 by the Pennsylvania Water & Power Company to supply electricity to York and Baltimore. PECO had discussed building another hydroelectric dam several miles downstream at Conowingo, Maryland with the Federal Government during World War I, though the project did not proceed due to the length of time it would take to complete it. The project was revived in the early 1920s, and PECO entered into negotiations with the Susquehanna Power Company, which owned the land needed for a dam. After two years of negotiations, a deal was worked out in 1924 by which PECO would purchase the Susquehanna Power Company and construct a \$59,000,000 dam that could produce 237,500 kW (Wainwright 1961:167-170). In comparison, the six steam plants PECO operated had a combined capacity of 529,000 kW in 1926 (Geasey 1995:136).

The planned hydroelectric station at Conowingo also represented a substantial savings for PECO. The facility would preclude the need for another station on the Schuylkill River and would save the company 750,000 tons of coal annually. Also, unlike the steam plants, which would take an hour and a half to have an emergency 36,000 kW unit ramp up, emergency power from the Conowingo station could be brought online in one minute. Due to the varied flow of the Susquehanna River, the Conowingo station would provide the base load of power when the water was high, with the steam plants making up the difference. When the water was low, the roles would be reversed, with the Conowingo station making up the difference. Overall, the power complex would be the second largest hydroelectric facility in the nation, surpassed only by the plant at Niagara Falls (Wainwright 1961:171, 178; *Sun*, 4 January 1925:16).

Initial borings and surveys for the dam were constructed in summer 1924. PECO created the Philadelphia Electric Power Company (PEPCO) as a subsidiary to own and operate the reservoir and transmission lines outside of PECO's territory. PEPCO would own Susquehanna Power Company, which owned the infrastructure in Maryland. While challenged in public utilities hearings by PRT, PECO won both state and federal approval for the project, which would cross state lines (Wainwright 1961:173-177; *Sun*, 13 January 1926:24, 4). Construction on the Conowingo dam began in March 1926 and by August, the first concrete for the project was being poured. The firm of Stone & Webster designed the Conowingo facility and constructed the powerhouse and a portion of the 4,648-foot-long dam. The construction of the transmission lines from the dam was undertaken by Day & Zimmerman. The lines were strung from a paired series of steel towers, which each supported three, one-inch diameter steel-core aluminum power cables (conductors) which could operate at 220 kV (Wainwright 1961:179-181).

PECO was still challenged by the need to connect Conowingo's power to the City of Philadelphia. The initial plan called for power to be routed to the Schuylkill power stations in Philadelphia by 132 kV lines, but it was determined that it was too expensive to build the lines through the necessary suburban and urban areas between Conowingo and Philadelphia, which were already densely developed (Wainwright 1961:179-181). The solution presented itself through a deal PECO was negotiating with the Pennsylvania Power & Light Company (PP&L) and the Public Service Electric & Gas Company of New Jersey (PSE&G). The plan was to create a massive interchange between the three utility companies—a concept known as superpower—and at 3,000,000 horsepower it would create the “largest pool of electric power in the world” (Wainwright 1961:181; Van Steen and Hurlbut 2011:43-44). Initially announced in February 1927 by PECO and PP&L, the three companies signed an agreement in September of that year to form the P.A. – N.J. Interconnection (*Evening News*, 21 February 1927:1, 30; *Philadelphia Inquirer*, 17 September 1927:24; PJM 2020a).

The pool would be effected by the construction of more than 210 miles of 220 kV transmission lines in a ring (Figure 1). These lines would connect at terminal substations located at Plymouth Meeting and Siegfried in Pennsylvania and Roseland, New Jersey. Each of the partners would build two transmission lines to meet the lines of their partners. PECO's lines would run from the 40-acre Plymouth Meeting substation—reportedly the world's largest—to the PP&L substation at Siegfried and to the Delaware River across from Lambertville, New Jersey, where it would connect with PSE&G (Van Steen and Hurlbut 2011:50-51, 53; Beamish 1927:7; PSE&G 2014:41-42).

It was decided that all electric power generated by Conowingo would run first to the Plymouth Meeting substation for distribution into the wider pool. The area between Conowingo and Plymouth Meeting was largely undeveloped farmland, making it far easier and less expensive to obtain right-of-way for a transmission line than it would have been in developed areas. In addition to supplying the Interconnection, Plymouth Meeting also (and perhaps more importantly at the time for PECO) would serve as the connection between the Conowingo station and Philadelphia. Through 1927, Day & Zimmerman built the twin rows of towers along a roughly 60-mile-long, 315-foot-wide right-of-way from Conowingo to Plymouth Meeting. Though there are presently tie-ins to the Peach Bottom nuclear power station, PP&L, and various substations, as built the line was a straight run from Conowingo to Plymouth Meeting (Geasey 1995:142; PECO 1928:2).

At Plymouth Meeting, the 220 kV power from both Conowingo and the connections to PP&L and PSE&G would be stepped down to 66 kV for transmission to Philadelphia (or alternately, the power produced in PECO's Philadelphia stations would be stepped up to 220 kV). To transmit the power to and from the new Westmoreland Substation at Westmoreland Street and Hunting Park Avenue in North Philadelphia, PECO struck a deal with the Reading Company which would allow the erection of 66 kV transmission lines along the Reading's railroad line paralleling the Schuylkill River. In exchange, the Reading could use the transmission towers to string its own catenary wires to electrify its commuter line (Wainwright 1961:181-182; PECO 1928:2).

PECO's sectors of the Interconnection began going online in 1928, with the Conowingo to Plymouth Meeting and the Plymouth Meeting to Siegfried sectors placed online that year. PECO's contributions to the Interconnection included pioneering the use of a master clock and state-of-the-art recording systems to regulate the power flow across the system. Prior to the Conowingo and Interconnection projects, PECO contracted with Leeds & Northrup to develop and manufacture

“an open-scale frequency recorder with a graphic record of instantaneous frequency with deviations from 60 Hz, more readable and with a higher accuracy” than was available from the vibrating reed type of frequency indicators in use at the time. To meet the request, Leeds & Northrup Company manufactured the “initial impedance bridge frequency recorder” first installed on the PECO system operations center in 1923. As a result, “the instrument became the standard for monitoring power system frequency throughout the world.” PECO is credited as “the first company to display before its system operators’ graphic recorders of the output of its four generating stations, total system generation and system frequency.” The standards set by PECO were not exceeded for many years (Van Steen and Hurlbut 2011:55).

In the ensuing decades after the PNJ Interconnection went online (the last of its original sectors began operation in 1932), the power pool expanded. It was renamed PJM Interconnection when Baltimore Gas & Electric and General Public Utilities (GPU) joined in 1956. Other utility companies continued to join the pool through the remainder of the 20th century and into the 21st, and at present the pool covers all or part of 12 states and the District of Columbia (PJM 2020a; PJM 2020b).

Significance of the PNJ Interconnection; Conowingo to Plymouth Meeting Transmission Line:

The significance of the PNJ Interconnection is well-documented in the previous HRSF for the Wallenpaupack to Siegfried Transmission Line. Aspects of its significance include:

- At the time of formation, it was the largest cooperative power pool in the U.S. and the first successful integration of large-scale electric utilities while retaining separate corporate ownerships.
- It advanced the design of transmission lines and structures to resist sleeting and other weather-related stresses, and successfully transmit high-voltage electricity over long distances.
- Standardized construction methods developed within the overall system allowed for transmission towers to be easily constructed and adapted for their specific locations.
- The system's innovations aided in developing design solutions to other environmental problems that affect transmission reliability, such as lightning impacts.
- The advent of the PNJ Interconnection "was a significant step in the extension of reliable electric supply to Pennsylvania and New Jersey and balanced the service needs of the region's rural, industrial, urban, and suburban areas. The contractual interconnection of the electric systems of these three major utility companies – PECO, PSE&G, and PP&L – resulted in an efficient means of electrical supply and distribution that benefitted all three companies by ensuring that sufficient electrical supply was available during peak load times" (Van Steen and Hurlbut 2011:57).
- The PNJ Interconnection's cooperative structure allowed its partners to weather market changes and increasing demand, and became a model for future cooperative agreements among utilities (Van Steen and Hurlbut 2011:57-68).

The PNJ Interconnection resource was recommended eligible under Criterion A in the areas of Engineering and Industry "as segments of the 1928 PNJ Interconnection of the PSE&G, PPL&L, and PECO transmission lines. The PNJ Interconnection – Wallenpaupack to Siegfried Line and the Bushkill to Roseland Line is significant on a national level (in both New Jersey and Pennsylvania) with a period of significance from the inception of the interconnection agreement in 1927 through the expansion of the interconnection into the Pennsylvania-New Jersey-Maryland Interconnection (PJM) in 1956" (Van Steen and Hurlbut 2011:58). It was also recommended eligible under Criterion C "as a significant engineering achievement of the late 1920s and specifically as an important advancement in the field of electrical utilities" (Van Steen and Hurlbut 2011:59). The PA SHPO concurred with these recommendations (MacDonald 2011).

The Conowingo to Plymouth Meeting sector of the PNJ Interconnection has not been previously identified or documented, and this evaluation focuses on this PECO-built sector. The Conowingo to Plymouth Meeting Transmission Line was critical to the completion and functionality of the overall PNJ Interconnection, and over the past 90+ years, it has continued to fulfill its original role in feeding power to a grid that has continued to grow over time. The addition of PECO and Conowingo to the proposed Interconnection was a key part of the cooperative pool's functionality and ability to succeed in providing power at a large multistate scale. As the largest hydroelectric plant in the system, and the second-largest in the country at the time of completion, the Conowingo Hydroelectric Plant was able to provide more power for the system than its original counterpart plants. As such, the transmission line from Conowingo to Plymouth Meeting was highly critical infrastructure, with much of the PNJ Interconnection system's success relying on its efficacy. As with the Conowingo Hydroelectric Plant, the Plymouth Meeting Substation was among the largest substations in the world at that time, and from its inception has formed a critical link for PECO and the PNJ Interconnection, as it distributes power into both the long-distance PNJ Interconnection and more locally to the City of Philadelphia. Connecting plant and substation, the Conowingo to Plymouth Meeting Transmission Line has been a vital link in both the PNJ Interconnection and the regional power grid since it went online in 1928. Designed and built by Day & Zimmerman, the transmission line incorporated the innovative engineering pioneered by the PNJ Interconnection's cooperating utilities, with conductors and towers that have stood the test of time. Innovations pioneered specifically by PECO, including frequency recorders, were utilized on this transmission line and elsewhere in the PNJ Interconnection. Overall, the Conowingo to Plymouth Meeting Transmission Line contributed greatly to the success of the PNJ Interconnection.

National Register of Historic Places Evaluation:

This evaluation specifically covers the subject portion of the Conowingo to Plymouth Meeting Transmission Line, not the overall line between Conowingo and Plymouth Meeting. The subject portion of the PNJ Interconnection; Conowingo to Plymouth Meeting Transmission Line retains integrity of design, materials, workmanship, feeling, and association. As an intact and important part of the original PNJ Interconnection, the subject portion of the PNJ Interconnection; Conowingo to Plymouth Meeting Transmission Line is recommended eligible for the NRHP as contributing to the previously recorded NRHP-eligible sectors of the PNJ Interconnection in Pennsylvania and New Jersey. The 14 towers and one access road within the subject resource are all contributing structures.

As with the other sectors, the subject portion of the PNJ Interconnection; Conowingo to Plymouth Meeting Transmission Line has significance under Criterion A in the areas of Engineering and Industry, as it forms part of an engineering innovation with wide-ranging impacts to the development of electrical power distribution grids, and was an integral part of a landmark cooperative agreement creating a power-pool partnership between three regional utilities. Given its clear association with the system and its success, this resource contributes to the overall PNJ Interconnection under Criterion A.

This resource also has significance under Criterion C as a cluster of intact typical transmission structures dating from the line's original construction, that lack individual distinction but collectively represent the innovation in engineering that made successful long-distance high-voltage transmission and creation of a power pool possible. The extant structures comprising the resource are standard types within the overall system, and representative of the innovative transmission infrastructure created by PECO and its PNJ Interconnection partners to resist weather-related stressors that affected earlier power transmission systems. Since the 14 structures date from within the period of significance and retain integrity, they contribute to the overall PNJ Interconnection under Criterion C.

The subject portion of the PNJ Interconnection; Conowingo to Plymouth Meeting Transmission Line does not appear to have significance under Criterion B, as research did not identify its association with particular individuals significant in our past. The resource also does not appear to have significance under Criterion D; given the nature of the resource and its structures, the standardized materials and construction methods used in construction, and the general lack of human activity surrounding the structures post-construction, it is unlikely to yield important information in history or prehistory.

The period of significance for the subject sector is 1927 to 1956, in keeping with the period of significance for the overall PNJ Interconnection resource. As previously discussed, the recommended boundary includes PECO's right-of-way and all transmission structures standing within it between the NHSL and the west end of Hansen Access Road, terminating immediately west of tower pair 4/1.

Historic Images (Item 37)

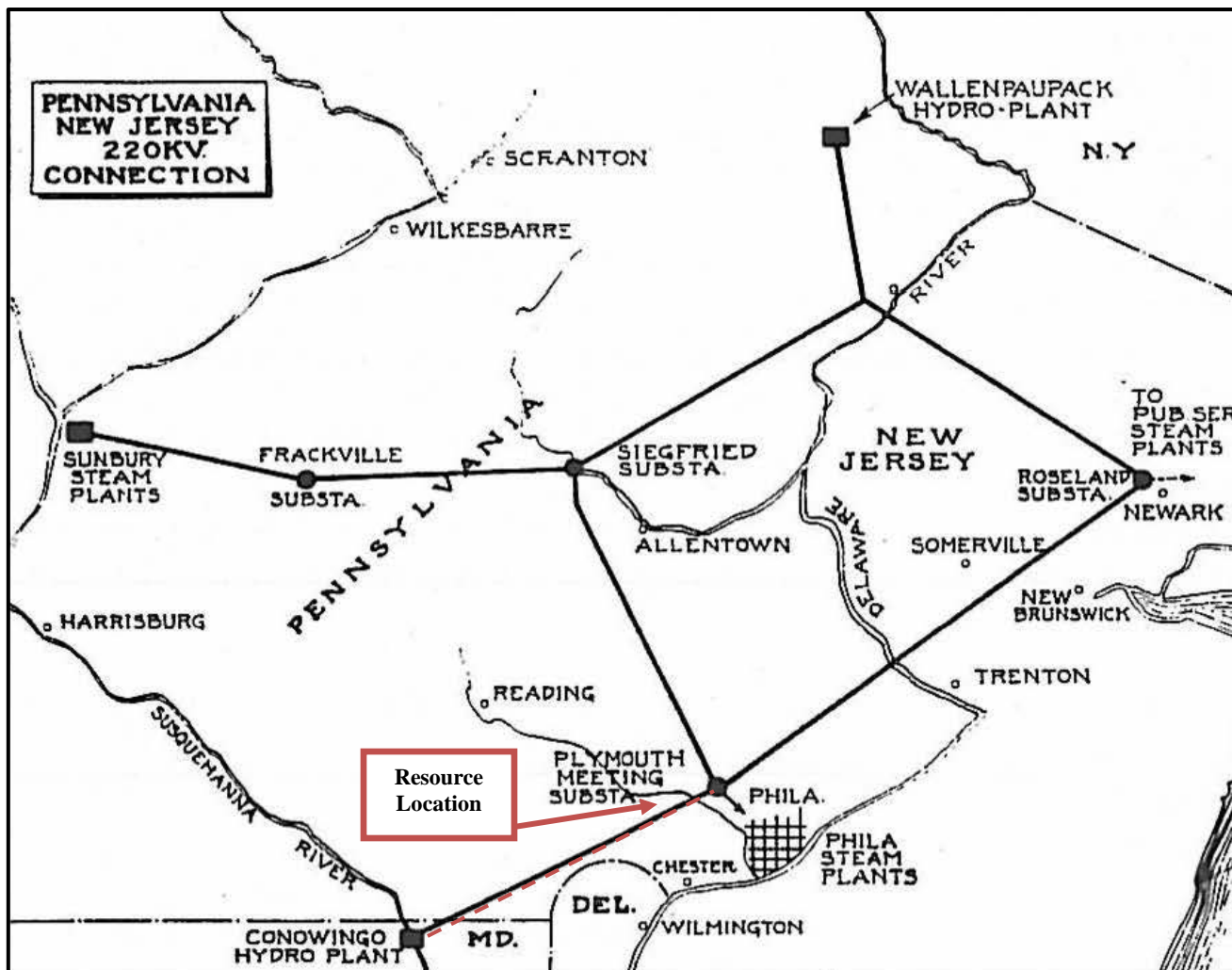


Figure 1. PNJ Interconnection Historical Map of Original System (Van Steen and McLane 2011:41). Markup shows location of PNJ Interconnection; Conowingo to Plymouth Meeting Transmission Line.

Historic Images (Item 37)

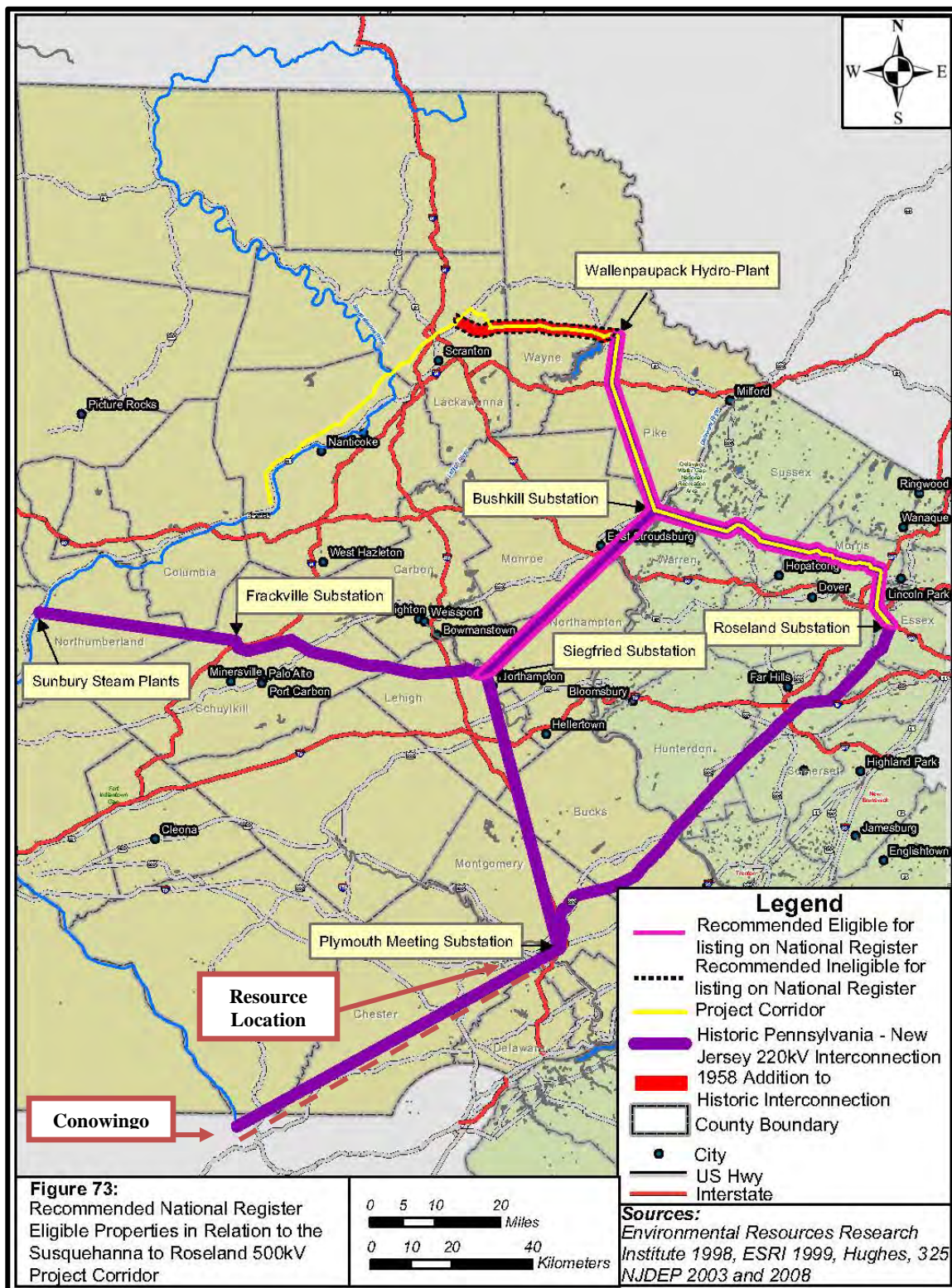


Figure 2. PNJ Interconnection Map showing NRHP-eligible sectors, Wallenpaupack to Siegfried and Bushkill to Roseland (Key No. 156601) (Van Steen and McLane 2011:167).

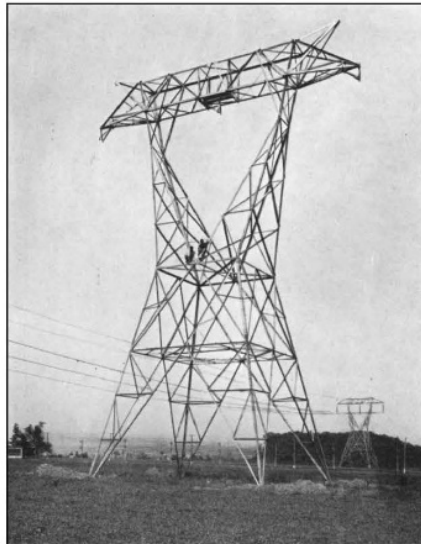


Figure 19: Standard (Historic) Tower Plymouth Meeting to Roseland Line. *Source: Funk 1931.*

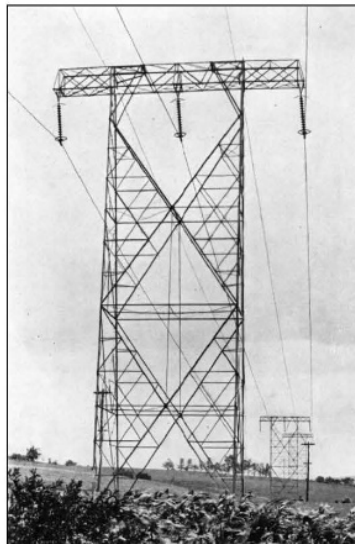


Figure 20: Standard (Historic) Tower Plymouth Meeting to Siegfried Line. *Source: Funk 1931.*

Figure 3. Historic photographs of standard original PECO tower designs under construction in PECO's Plymouth Meeting to Roseland and Plymouth Meeting to Siegfried sectors, ca. 1927 (Van Steen and McLane 2011:50).

Photographs (Item 37)

Photograph 1. PNJ Interconnection; Conowingo to Plymouth Meeting Transmission Line. East end of resource; view looking southwest across NHSL from PECO ROW at Crooked Lane.



Photograph 2. View looking northeast from Republic Services property toward easternmost tower pair 2/8.

Photographs (Item 37)

Photograph 3. Transmission corridor looking southwest from Republic Services property toward tower pair 3/1.



Photograph 4. View looking east from Saulin Blvd. vicinity; tower pair 3/1 in foreground.

Photographs (Item 37)

Photograph 5. View looking northeast from Henderson Rd. showing tower pairs 3/1 (front) and 2/5 (at rear).



Photograph 6. Side view of tower pair 3/2 at Henderson Rd., view to south.

Photographs (Item 37)

Photograph 7. View to southwest up steep hill from Henderson Rd.; tower 3/2 at right. Note access road entrance at center.



Photograph 8. Tower pairs 3/4 in foreground and 3/3 in background, view to northeast across the PA Turnpike.

Photographs (Item 37)

Photograph 9. View of west end of resource looking southwest along Hansen Access Rd. above the PA Turnpike.



Photograph 10. View from west end of resource looking northeast across the PA Turnpike.

Photographs (Item 37)



Photograph 11. South tower in 3/5 pair showing oblique view with typical details; view to northeast.

Photographs (Item 37)



Photograph 12. North tower in 3/5 pair showing side view with typical details, view to north.

Photographs (Item 37)

Photograph 13. Upward detail view to northeast of upper part of north tower in 3/5 pair, showing typical arrangement of three conductors with vertical insulator strings, and two grounding wires at top.



Photograph 14. Detail of southwest anchor foot of north tower in 3/5 pair, view to northeast.

Attachment C: Tables

Table 1. Summary of Effects Evaluations for Design Refinements

Resource Name	PA SHPO Key No.	Previous Finding	Current Finding	Justification
<i>Previously Identified Resources</i>				
Pennsylvania Turnpike; Delaware River Extension	155679	No Adverse Effect	No Adverse Effect	Design refinements do not change effects
Philadelphia and Western Railway	128825	No Adverse Effect	No Adverse Effect	Design refinements do not change effects
American Baptist Churches USA Mission Center	203535	No Adverse Effect	No Historic Properties Affected	Land take no longer required
Market Street Elevated Railway Historic District	105499	No Historic Properties Affected	No Historic Properties Affected	Design refinements are not within or in proximity to HD
69th Street Terminal Square Shopping District	156448	No Historic Properties Affected	No Historic Properties Affected	Design refinements are not within or in proximity to HD
<i>Newly Identified Resources</i>				
PNJ Interconnection; Conowingo to Plymouth Meeting Transmission Line	156601	N/A	Adverse Effect	Design refinements result in demolition and replacement of part of resource

Table 2. Results of Effects Evaluation for the Pennsylvania Turnpike: Delaware River Extension (Key No. 155679)

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 Preferred Alternative would provide two new elevated overpasses crossing the PA Turnpike in Upper Merion Township, and elevated track running parallel to the north side of the Turnpike, within the Turnpike right-of-way. In both locations, the Project would be within the NRHP boundary of the eligible Pennsylvania Turnpike: Delaware River Extension
Finding: The proposed undertaking results in a finding of Historic Properties Affected .	

Table 3. Application of Criteria of Adverse Effect for Pennsylvania Turnpike: Delaware River Extension (Key No. 155679)

<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>	
<p>Examples of Adverse Effects (36 CFR 800.5(a)(2))</p>	<p>Evaluation</p>
<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 Preferred Alternative 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.</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 NRHP boundary.</p>
<p>(iii) Removal of the property from its historic location;</p>	<p>The Preferred Alternative 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 Preferred Alternative 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 Preferred Alternative would not change the character of the PA Turnpike's use or affect remaining physical features 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 Preferred Alternative would introduce new visual elements into the PA Turnpike corridor, including two new elevated crossings over the roadway and elevated tracks along the north side of the roadway, within the right-of-way. Potential replacement of PECO transmission towers east of the Turnpike may occur on the hillside north of the highway. 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</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 Preferred Alternative 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>Finding: The proposed undertaking results in a finding of No Adverse Effect on the Pennsylvania Turnpike: Delaware River Extension (Key No. 155679).</p>	

Table 4. Results of Effects Evaluation for Philadelphia and Western Railway: Norristown High Speed Line (Key No. 128825)

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 Preferred Alternative 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 th 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.
Finding: The proposed undertaking results in a finding of Historic Properties Affected .	

Table 5. Application of Criteria of Adverse Effect for Philadelphia and Western Railway: Norristown High Speed Line (Key No. 128825)

<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>	
<p>Examples of Adverse Effects (36 CFR 800.5(a)(2))</p>	<p>Evaluation</p>
<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 Preferred Alternative would add new elements and modify existing elements within the NRHP 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 69th Street Transportation Center, but would 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.</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 Preferred Alternative 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 NRHP boundary.</p>
<p>(iii) Removal of the property from its historic location;</p>	<p>The Preferred Alternative 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 Preferred Alternative 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 Preferred Alternative's new elements, namely track turnoffs in Upper Merion Township and a new track at 69th Street, 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. Although within the Visual Effects APE for the PECO tower replacements in Upper Merion Township, the setting at this location is already highly modernized and changes to the towers would not affect significant historic features within the railroad corridor.</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 Preferred Alternative 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 Preferred Alternative would not result in the transfer, lease, or sale out of Federal control.</p>
<p>Finding: The proposed undertaking results in a finding of No Adverse Effect on the Philadelphia and Western Railway; Norristown High Speed Line (Key No. 128825).</p>	

Table 6. Results of Effects Evaluation for American Baptist Churches USA Mission Center (Key No. 203535)

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 Preferred Alternative will be built on the north side of 1 st Avenue, outside the NRHP boundary for the ABCUSA Mission Center. It will not have direct or indirect impacts on the resource. The previous design plans called for taking of a small strip of land, but the current Preferred Alternative moved the 1 st and Moore station facility northward across 1 st Avenue, so taking of land from ABCUSA is no longer necessary. Therefore, the Project would have no effect on the American Baptist Churches USA Mission Center (Key No. 203535).
Finding: The proposed undertaking results in a finding of No Historic Properties Affected .	

**Table 7. Results of Effects Evaluation for Market Street Elevated Railway Historic District
(Key No. 105499)**

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 Preferred Alternative modifications to the northernmost platform, access stairs, bus loop, and west elevation of the circa-1982 northernmost section of the 69th Street Transportation Center station building would occur in and adjacent to a modern extension of the circa-1909 station building (Philadelphia Transit Co. Building, 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 NRHP boundary of this property.</p> <p>No work would occur within the NRHP 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. Therefore, the Project would have no effect on the Market Street Elevated Railway Historic District (Key No. 105499).</p>
<p>Finding: The proposed undertaking results in a finding of No Historic Properties Affected.</p>	

Table 8. Results of Effects Evaluation for 69th Street Terminal Square Shopping District (Key No. 156448)

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 Preferred Alternative modifications to the northernmost platform, access stairs, bus loop, and west elevation of the northernmost section of the 69th Street Transportation Center station building would occur in and adjacent to a modern extension of the circa-1909 station building (Philadelphia Transit Co. Building, 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 NRHP boundary of this resource, a contributing resource within the historic district.</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. 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 (Key No. 156448).</p>
<p>Finding: The proposed Project results in a finding of No Historic Properties Affected.</p>	

**Table 9. Results of Effects Evaluation for
PNJ Interconnection; Conowingo to Plymouth Meeting Transmission Line
(Key No. 156601)**

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 clearances for proposed elevated guideway between the NHSL and the PA Turnpike under the Preferred Alternative, approximately 4 to 7 contributing steel lattice transmission towers within the NRHP boundary for the resource would need to be replaced with taller monopole structures. Therefore, the proposed Project would have an Effect on the PNJ Interconnection; Conowingo to Plymouth Meeting Transmission Line.
Finding: The proposed undertaking results in a finding of Historic Properties Affected .	

**Table 10. Application of Criteria of Adverse Effect for the PNJ Interconnection;
Conowingo to Plymouth Meeting Transmission Line (Key No. 156601)**

<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>	
<p align="center">Examples of Adverse Effects (36 CFR 800.5(a)(2))</p>	<p align="center">Evaluation</p>
<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>Under the Preferred Alternative, part of the property (approximately 4 to 7 steel lattice transmission towers) within the NRHP boundary would be demolished and replaced.</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>Under the Preferred Alternative, the property would be altered by the removal of 4 to 7 steel lattice transmission towers and replacement with taller monopole structures of modern design. The proposed replacement structures are inconsistent with the Secretary's Standards; in-kind replacement of the towers with taller steel lattice towers is not possible since these structures are no longer built.</p>
<p>(iii) Removal of the property from its historic location;</p>	<p>The Preferred Alternative would not involve removal of the property 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 replacement of the existing towers with visually and structurally different monopoles would not change the character of the property's use, as the transmission line would continue to function as such. However, the Preferred Alternative would change physical features within the property's setting by removing contributing structures.</p>
<p>(v) Introduction of visual, audible, or atmospheric elements that diminish the integrity of the property's significant historic features;</p>	<p>The Preferred Alternative would introduce new visual elements into the surrounding setting. Removing the extant towers and introducing taller and significantly different monopole transmission towers would diminish the integrity of the historic transmission line corridor.</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	The Preferred Alternative would not result in the neglect of the PNJ Interconnection; Conowingo to Plymouth Meeting Transmission Line.
(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.	The PNJ Interconnection; Conowingo to Plymouth Meeting Transmission Line is not under Federal ownership; the Preferred Alternative would not result in the transfer, lease, or sale of the property out of Federal control.
Finding: The proposed undertaking results in a finding of Adverse Effect on the PNJ Interconnection; Conowingo to Plymouth Meeting Transmission Line (Key No. 156601) .	

Appendix D: Consulting Party Contact List

KOP Rail Section 106 Consultation - Consulting Parties Contact List
10/26/2020

ORGANIZATION	PREFIX	FIRST NAME	LAST NAME	TITLE	ADDRESS 1	ADDRESS 2	ADDRESS 3	CITY	STATE	ZIP CODE	PHONE	ALTERNATE PHONE	FAX	EMAIL		
SEPTA	Ms.	Elizabeth	Smith	Project Manager											Agreed to Consult?	Y
SEPTA	Mr.	Fritz	Ohrenschall	Planner												
Federal Transit Administration	Mr.	Timothy	Lidiak	Community Planner	1760 Market Street	Suite 500		Philadelphia	PA	19103-4124	215-656-7084		215-656-7260	timothy.lidiak@dot.gov		
Federal Transit Administration	Mr.	Daniel	Koenig	Environmental Protection Specialist	1990 K Street NW	Suite 510		Washington	DC	20006-1178				daniel.koenig@dot.gov		N
Pennsylvania Historical and Museum Commission	Ms.	Emma	Diehl	Historic Preservation Specialist	Bureau for Historic Preservation	Keystone Building	400 North Street, 2nd floor	Harrisburg	PA	17120	717-787-9121		717-783-9924	emdiehl@pa.gov	X	
National Park Service, Northeast Region	Ms.	Gay	Vietzke	Regional Director	1234 Market Street	20th Floor		Philadelphia	PA	19107	215-597-7013	215-597-7018	215-579-0815	Gay.Vietzke@nps.gov		X
Valley Forge National Historical Park	Ms.	Amy	Ruhe	Chief of Park Planning	1400 N. Outer Line Drive			King of Prussia	PA	19406	610-783-1047			Amy_Ruhe@nps.gov		X
Montgomery County Planning Commission	Mr.	Scott	France	Director of Planning	Montgomery County Planning Commission		PO Box 311	Norristown	PA	19404-0311	610-278-3722		610-278-3747	SFrance@montcopa.org	X	
Montgomery County Division of Parks, Trails and Historic Sites	Mr.	David	Clifford	Director Parks, Trails and Historic Sites	PO Box 311			Norristown	PA	19404	610-278-3555		610-278-3557	dcliffor@montcopa.org	X	
Historical Society of Montgomery County	Mr.	Barry	Rauhauser	Executive Director	1654 DeKalb Street			Norristown	PA	19401	610 272-0297			https://hsmcpa.org/index.php/contact-us/1-barry-rauhauser	X	
The Heritage Conservancy	Mr.	Jeffrey	Marshall	President	Historic Aldie Mansion	85 Old Dublin Pike		Doylestown	PA	18901	215-345-7020 x113			jmarshall@heritageconservancy.org		X
Upper Merion Planning Commission	Ms.	Jacquelin	Camp	Chairperson	175 West Valley Forge Road			King of Prussia	PA	19406	215-430-5059			jcamp@wrtdesign.com	X	
Upper Merion Planning Commission	Mr.	Rob	Loeper	Lead Planner	175 West Valley Forge Road			King of Prussia	PA	19406	610-265-2606 x107		610-265-8467	rloeper@umtownship.org	X	
King of Prussia Historical Society	Mr.	David	Montalvo	Chairman	PO Box 60716			King of Prussia	PA	19406				info@kophistory.org	X	
Chester County Historic Preservation Network	Mr.	James	Garrison	President	PO Box 174			West Chester	PA	19381				jonrobjam@verizon.net		X
Chester County Historical Society	Mr.	Conor	Hepp	President	225 N. High Street			West Chester	PA	19380	610 692-4800 ext. 237			President@chestercohistorical.org		X
Chester County Planning Commission	Mr.	Brian	O'Leary	Executive Director	2 North High Street, Suite A	PO Box 2748		West Chester	PA	19380	610-344-6285			ccplanning@chesco.org		X
Chester County Planning Commission	Ms.	Karen	Marshall	Heritage Preservation Coordinator	601 Westtown Road, Suite 270	PO Box 2747		West Chester	PA	19380-0990				kmarshall@chesco.org		X
Tredyffrin Historic Preservation Trust	Ms.	Patty	Benson	President	PO Box 764			Devon	PA	19333	610 644-6759			info@tredyffrinhistory.org		X
Tredyffrin Township Historical Commission	Mr.	Rob	Williams	Chair	1100 Duportail Road			Berwyn	PA	19312	610 644-1400			tredyffrin@tredyffrin.org		X
Upper Darby Township	Mr.	Vincent	Rongione, Esq.	Chief Administrative Officer	100 Garrett Road	Room 206		Upper Darby	PA	19082	610-734-7622		610-734-7709	vrongione@upperdarby.org	X	
Upper Darby Historical Society	Ms.	Beverly	Rorer		PO Box 731			Drexel Hill	PA	19026						X
Delaware County Planning Department	Mr.	Thomas	Shaffer	Mgr. Transportation Planning	201 W. Front Street			Media	PA	19063	601-891-5217			shaffert@co.delaware.pa.us		X
Delaware County Historical Society	Ms.	Linda	Houldin	Executive Director	991 Palmers Mill Road			Media	PA	19063						X
Preservation Alliance for Greater Philadelphia	Mr.	Paul	Steinke	Executive Director	1608 Walnut Street, Suite 804			Philadelphia	PA	19103				paul@preservationalliance.com		X
PECO Energy Company	Mr.	John	Halderman	Associate General Counsel	2301 Market Street			Philadelphia	PA	19103	215-841-4263			john.halderman@exeloncorp.com		
PECO Energy Company	Mr.	Peter	Kirlin	Senior Account Manager										Peter.Kirlin2@exeloncorp.com		
The Delaware Tribe	Mr.	Brice	Obermeyer	Tribal Historic Preservation Officer	1200 Commercial Street	Roosevelt Hall - Room 212	Emporia State University	Emporia	KS	66801				bobermey@emporia.edu		X
The Delaware Nation	Ms.	Nekole	Alligood	Cultural Preservation Officer	31064 State Highway 281	P.O. Box 825		Anadarko	OK	73005	405-247-2448	Ext 1403		nalligood@delawarenation.com		X
The Oneida Indian Nation	Mr.	Jesse	Bergevin	Tribal Historic Preservation Officer	2037 Dream Catcher Plaza			Oneida	NY	13421				jbergevin@oneida-nation.org		X
The Eastern Shawnee Tribe of Oklahoma	Ms.	Robin	Dushane	Cultural Preservation Director	12705 S. 705 Road			Wyandotte	OK	74370				rdushane@estoo.net		X
Stockbridge-Munsee Community of Mohican Indians	Ms.	Sherry	White	Tribal Historic Preservation Officer	W13447 Camp 14 Road	P.O. Box 70		Bowler	WI	54416				Sherry.white@mohican-nsn.gov		X



November 19, 2020

Mr. Timothy Lidiak
Federal Transit Administration, Region 3
1760 Market Street, Suite 500
Philadelphia, PA 19103-4124

Ref: *Proposed King of Prussia Rail Extension Project*
Montgomery and Delaware Counties, Pennsylvania
ACHP Project Number: 16174

Dear Mr. Lidiak:

The Advisory Council on Historic Preservation (ACHP) has received your notification and supporting documentation regarding the adverse effects of the referenced undertaking on a property or properties listed or eligible for listing in the National Register of Historic Places. Based upon the information provided, we have concluded that Appendix A, *Criteria for Council Involvement in Reviewing Individual Section 106 Cases*, of our regulations, "Protection of Historic Properties" (36 CFR Part 800), does not apply to this undertaking. Accordingly, we do not believe that our participation in the consultation to resolve adverse effects is needed. However, if we receive a request for participation from the State Historic Preservation Officer (SHPO), Tribal Historic Preservation Officer (THPO), affected Indian tribe, a consulting party, or other party, we may reconsider this decision. Additionally, should circumstances change, and it is determined that our participation is needed to conclude the consultation process, please notify us.

Pursuant to 36 CFR §800.6(b)(1)(iv), you will need to file the final Memorandum of Agreement (MOA), developed in consultation with the Pennsylvania State Historic Preservation Officer (SHPO), and any other consulting parties, and related documentation with the ACHP at the conclusion of the consultation process. The filing of the MOA, and supporting documentation with the ACHP is required in order to complete the requirements of Section 106 of the National Historic Preservation Act.

Thank you for providing us with the notification of adverse effect. If you have any questions or require further assistance, please contact Sarah Stokely at (202) 517-0224 or by email at sstokely@achp.gov.

Sincerely,

LaShavio Johnson
Historic Preservation Technician
Office of Federal Agency Programs

**MEMORANDUM OF AGREEMENT
AMONG
THE FEDERAL TRANSIT ADMINISTRATION,
THE PENNSYLVANIA STATE HISTORIC PRESERVATION OFFICER, AND
THE SOUTHEASTERN PENNSYLVANIA TRANSPORTATION AUTHORITY
REGARDING THE KING OF PRUSSIA RAIL EXTENSION PROJECT
UPPER MERION TOWNSHIP, MONTGOMERY COUNTY AND UPPER DARBY
TOWNSHIP, DELAWARE COUNTY, PENNSYLVANIA**

WHEREAS, the Federal Transit Administration (FTA) plans to provide financial assistance to the Southeastern Pennsylvania Transportation Authority (SEPTA) for the construction of the King of Prussia (KOP) Rail Extension Project, with improvements in Upper Merion Township, Montgomery County and Upper Darby Township, Delaware County, Pennsylvania (Undertaking); and

WHEREAS, the Undertaking consists of construction of a new rail line and stations branching off the west side of the existing Norristown High Speed Line (NHSL), passing through King of Prussia, and terminating on the north side of First Avenue in Upper Merion Township, and includes track, platform, and interior passenger circulation improvements at the 69th Street Transportation Center in Upper Darby Township; and

WHEREAS, FTA has defined the Undertaking's Area of Potential Effects (APE) as the area within which the Undertaking may cause changes in the character or use of standing resources listed in or eligible for the National Register of Historic Places (NRHP), including resources from which the Undertaking may be visible and/or create a visual impact to the integrity of a historic property for above-ground properties (encompassing 485 acres). The APE includes the limits of disturbance for archaeological resources (encompassing 92 acres). The APE for the Undertaking is shown on the map in Attachment A; and

WHEREAS, pursuant to 36 CFR § 800.5(a), FTA has determined that the Undertaking may have an adverse effect on the Pennsylvania-New Jersey (PNJ) Interconnection; Conowingo to Plymouth Meeting Transmission Line (Key No. 156601), which is eligible for listing in the NRHP, and has consulted with the Pennsylvania State Historic Preservation Officer (PA SHPO) pursuant to 36 CFR Part 800, the regulations implementing Section 106 of the National Historic Preservation Act (NHPA; 54 U.S.C. § 306108); and

WHEREAS, SEPTA, as a recipient of Federal assistance for the Undertaking, is a consulting party in the Section 106 process pursuant to 36 CFR § 800.2(c)(4) with a responsibility in implementing the terms of the MOA, and is invited to sign this MOA as an invited signatory pursuant to 36 CFR § 800.6(c)(2); and

WHEREAS, FTA invited the National Park Service, Northeast Region; Valley Forge National Historical Park; the Montgomery County Planning Commission; the Montgomery County Division of Parks, Trails and Historic Sites; the Historical Society of Montgomery County; the Heritage Conservancy; the Upper Merion Township Planning Commission; the King of Prussia Historical Society; the Chester County Historic Preservation Network; the Chester County Historical Society; the Chester County Planning Commission; the Tredyffrin Historic Preservation Trust; the Tredyffrin Township Historical Commission; Upper Darby Township; the Upper Darby

Historical Society; the Delaware County Planning Department; the Delaware County Historical Society; the Preservation Alliance for Greater Philadelphia; The Delaware Tribe; The Delaware Nation; The Oneida Indian Nation; The Eastern Shawnee Tribe of Oklahoma; the Stockbridge-Munsee Community of Mohican Indians; and the PECO Energy Company (PECO) to participate as consulting parties to the Undertaking; and

WHEREAS, the Montgomery County Planning Commission, the Montgomery County Division of Parks, Trails and Historic Sites, the Historical Society of Montgomery County, the King of Prussia Historical Society, the Upper Merion Township Planning Commission, Upper Darby Township, and the PECO Energy Company (PECO) have agreed to be consulting parties to the Undertaking; and

WHEREAS, PECO is the owner and operator of the portion of the NRHP-eligible resource that will be adversely affected by the Undertaking and is a consulting party in the Section 106 process pursuant to 36 CFR §800.2(c)(5). FTA invited PECO to concur with this MOA pursuant to 36 CFR § 800.6(c)(3) but PECO declined to participate as a concurring party; and

WHEREAS, in accordance with 36 CFR § 800.6(a)(1), FTA has notified the Advisory Council on Historic Preservation (ACHP) of its adverse effect determination with specified documentation, and the ACHP has chosen not to participate in the consultation pursuant to 36 CFR § 800.6(a)(1)(iii); and

NOW, THEREFORE, FTA, SEPTA, and PA SHPO agree that the Undertaking shall be implemented in accordance with the following stipulations in order to take into account the effect of the Undertaking on historic properties.

STIPULATIONS

FTA and SEPTA will ensure that the following measures are carried out:

I. Mitigation Measures

SEPTA shall prepare GIS mapping of the portion of the PNJ Interconnection; Conowingo to Plymouth Meeting Transmission Line (Key No. 156601) in Pennsylvania for submittal to PA SHPO and integration into PA SHPO's Cultural Resources Geographic Information System (CRGIS) and/or any successor GIS systems. Mapping shall be a boundary shape and cover the area of the resource between the Commonwealth of Pennsylvania border with Maryland and PECO's Plymouth Meeting Substation in Plymouth Meeting, Pennsylvania. The mapping shall be provided as ArcGIS shapefiles and shall be prepared and submitted in compliance with PA SHPO guidelines for GIS deliverables. This mapping will be an addendum to the resource as mapped in the previous Historic Resources Survey Form (HRSF) for the PNJ Interconnection; Conowingo to Plymouth Meeting Transmission Line (Key No. 156601).

The GIS mapping shall be a desktop task, using readily available online information. SEPTA's GIS analyst shall coordinate with an architectural historian during the GIS

mapping task to identify the boundary in areas where data is available, as well as to identify areas where the resource boundary is unclear and will require verification by means of additional study by others in the future. The architectural historian shall meet the *Secretary of the Interior's Professional Qualification Standards* (48 FR 44738-9). In addition, the GIS mapping effort shall identify notable features or losses of integrity to the extent that the available desktop data can provide, scaled to within a two-day work effort.

The GIS mapping shall be accompanied by a brief memorandum that identifies the methodology, assumptions, and data sources used. The notable features or losses of integrity identified during GIS mapping will be recorded in a table or as notes in the memorandum. To the extent that the GIS mapping effort identifies sources of information that may be useful to others in future research regarding the PNJ Interconnection; Conowingo to Plymouth Meeting Transmission Line, the memorandum shall cite those sources.

II. General Provisions

A. Undertaking Changes

If SEPTA proposes changes to the Undertaking that may result in additional or new effects on historic properties, SEPTA will notify FTA and the PA SHPO of such changes. Before SEPTA takes any action that may result in additional or new effects on historic properties, SEPTA, FTA, and PA SHPO will consult to determine the appropriate course of action.

B. In the event that another federal agency not initially a party to or subject to this MOA receives an application for funding/license/permit for the Undertaking as described in this MOA, that agency may fulfill its Section 106 responsibilities by stating in writing it concurs with the terms of this MOA and notifying FTA, SHPO, and SEPTA that it intends to do so. Such agreement shall be evidenced by filing their intent use this MOA to fulfill their Section 106 responsibilities with the ACHP, and implementation of the terms of this MOA.

III. Duration

FTA and SEPTA will implement the terms of this MOA, including Stipulation I, prior to demolition of any transmission towers related to construction of the Undertaking. SEPTA will notify the signatories to this MOA in writing of the start date of Undertaking construction in the portion of the PNJ Interconnection; Conowingo to Plymouth Meeting Transmission Line (Key No. 156601) that is within the Undertaking's limit of disturbance (also known as the PECO corridor), and the expected duration of construction in that location. SEPTA will again notify the signatories to this MOA in writing of the end date of construction in the PECO corridor. This MOA will expire if its terms are not carried out within ten (10) years from the date of its execution; prior to such time, FTA may consult with the other signatories to reconsider the terms of the MOA and amend it in accordance with Stipulation VII.

IV. Post-Review Discoveries

If any newly identified historic properties are discovered or unanticipated effects on known historic properties are identified during the implementation of this Undertaking, SEPTA shall immediately notify FTA. FTA will notify the PA SHPO of the discovery within 48 hours and consult with PA SHPO in accordance with 36 C.F.R. § 800.13(b)(3) to develop and implement actions to identify historic properties and resolve adverse effects.

V. Monitoring and Reporting

On or before September 30 of each year following the execution of this MOA until all stipulations are satisfied or the MOA is terminated, SEPTA shall provide all parties to this MOA a summary report detailing work undertaken pursuant to its terms. Such report shall include any scheduling changes proposed, any problems encountered, and any disputes and objections received in FTA and SEPTA's efforts to carry out the terms of this MOA.

VI. Dispute Resolution

Any Signatory or concurring party to this MOA may object at any time to any actions proposed or to the manner in which the terms of this MOA are implemented by providing written notice to FTA, and FTA shall consult with such party to resolve the objection. If FTA determines that such objection cannot be resolved, FTA will:

- A. Forward all documentation relevant to the dispute, including the FTA's proposed resolution, to the ACHP. The ACHP shall provide FTA with its advice on the resolution of the objection within thirty (30) days of receiving adequate documentation. Prior to reaching a final decision on the dispute, FTA shall prepare a written response that takes into account any timely advice or comments regarding the dispute from the ACHP, Signatories, and concurring parties, and provide them with a copy of this written response. FTA will then proceed according to its final decision.
- B. If the ACHP does not provide its advice regarding the dispute within the thirty (30) day time period, FTA may make a final decision on the dispute and proceed accordingly. Prior to reaching such a final decision, FTA shall prepare a written response that takes into account any timely comments regarding the dispute from the Signatories and concurring parties to the MOA, and provide them and the ACHP with a copy of such written response.
- C. FTA's responsibility to carry out all other actions subject to the terms of this MOA that are not the subject of the dispute remain unchanged.

VII. Amendments

This MOA may be amended when such an amendment is agreed to in writing by all Signatories. The amendment will be effective on the date a copy signed by all the Signatories is filed with the ACHP.

VIII. Termination

If any Signatory to this MOA determines that its terms will not or cannot be carried out, that party shall immediately consult with the other Signatories to attempt to develop an amendment per Stipulation VII, above. If within thirty (30) calendar days (or another time period agreed to by all Signatories) an amendment cannot be reached, any Signatory may terminate the MOA upon written notification to the other Signatories. Once the MOA is terminated, and prior to work continuing on the Undertaking, FTA must either (a) execute an MOA pursuant to 36 CFR § 800.6 or (b) request, take into account, and respond to the comments of the ACHP under 36 CFR § 800.7. FTA shall notify the Signatories as to the course of action it will pursue.

IX. Anti-Deficiency Act

FTA's obligations under this MOA are subject to the availability of appropriated funds, and the stipulations of this MOA are subject to the provisions of the Anti-Deficiency Act. FTA shall make reasonable and good faith efforts to secure the necessary funds to implement this MOA in its entirety. If compliance with the Anti-Deficiency Act alters or impairs FTA's ability to implement the stipulations of this agreement, FTA shall consult in accordance with the amendment and termination procedures found at Stipulations VII and VIII of this agreement.

EXECUTION of this MOA by FTA, SEPTA, and PA SHPO, and implementation of its terms are evidence that FTA and SEPTA have taken into account the effects of this Undertaking on historic properties and afforded the ACHP an opportunity to comment.

**MEMORANDUM OF AGREEMENT
AMONG
THE FEDERAL TRANSIT ADMINISTRATION,
THE PENNSYLVANIA STATE HISTORIC PRESERVATION OFFICER, AND
THE SOUTHEASTERN PENNSYLVANIA TRANSPORTATION AUTHORITY
REGARDING THE KING OF PRUSSIA RAIL EXTENSION PROJECT
UPPER MERION TOWNSHIP, MONTGOMERY COUNTY AND UPPER DARBY
TOWNSHIP, DELAWARE COUNTY, PENNSYLVANIA**

SIGNATORY

FEDERAL TRANSIT ADMINISTRATION (FTA)

Theresa "Tony" Garcia Crews Digitally signed by THERESA
By: _____ GARCIA CREWS Date: 2020.11.25 12:14:43 -05'00' Date: _____
Theresa Garcia Crews, Regional Administrator
Federal Transit Administration, Region 3

**MEMORANDUM OF AGREEMENT
AMONG
THE FEDERAL TRANSIT ADMINISTRATION,
THE PENNSYLVANIA STATE HISTORIC PRESERVATION OFFICER, AND
THE SOUTHEASTERN PENNSYLVANIA TRANSPORTATION AUTHORITY
REGARDING THE KING OF PRUSSIA RAIL EXTENSION PROJECT
UPPER MERION TOWNSHIP, MONTGOMERY COUNTY AND UPPER DARBY
TOWNSHIP, DELAWARE COUNTY, PENNSYLVANIA**

SIGNATORY

PENNSYLVANIA STATE HISTORIC PRESERVATION OFFICE (PA SHPO)

By:  Date: 11/23/2020
Andrea MacDonald, Director, State Historic Preservation Office, and
Deputy State Historic Preservation Officer

**MEMORANDUM OF AGREEMENT
AMONG
THE FEDERAL TRANSIT ADMINISTRATION,
THE PENNSYLVANIA STATE HISTORIC PRESERVATION OFFICER, AND
THE SOUTHEASTERN PENNSYLVANIA TRANSPORTATION AUTHORITY
REGARDING THE KING OF PRUSSIA RAIL EXTENSION PROJECT
UPPER MERION TOWNSHIP, MONTGOMERY COUNTY AND UPPER DARBY
TOWNSHIP, DELAWARE COUNTY, PENNSYLVANIA**

INVITED SIGNATORY

SOUTHEASTERN PENNSYLVANIA TRANSPORTATION AUTHORITY (SEPTA)

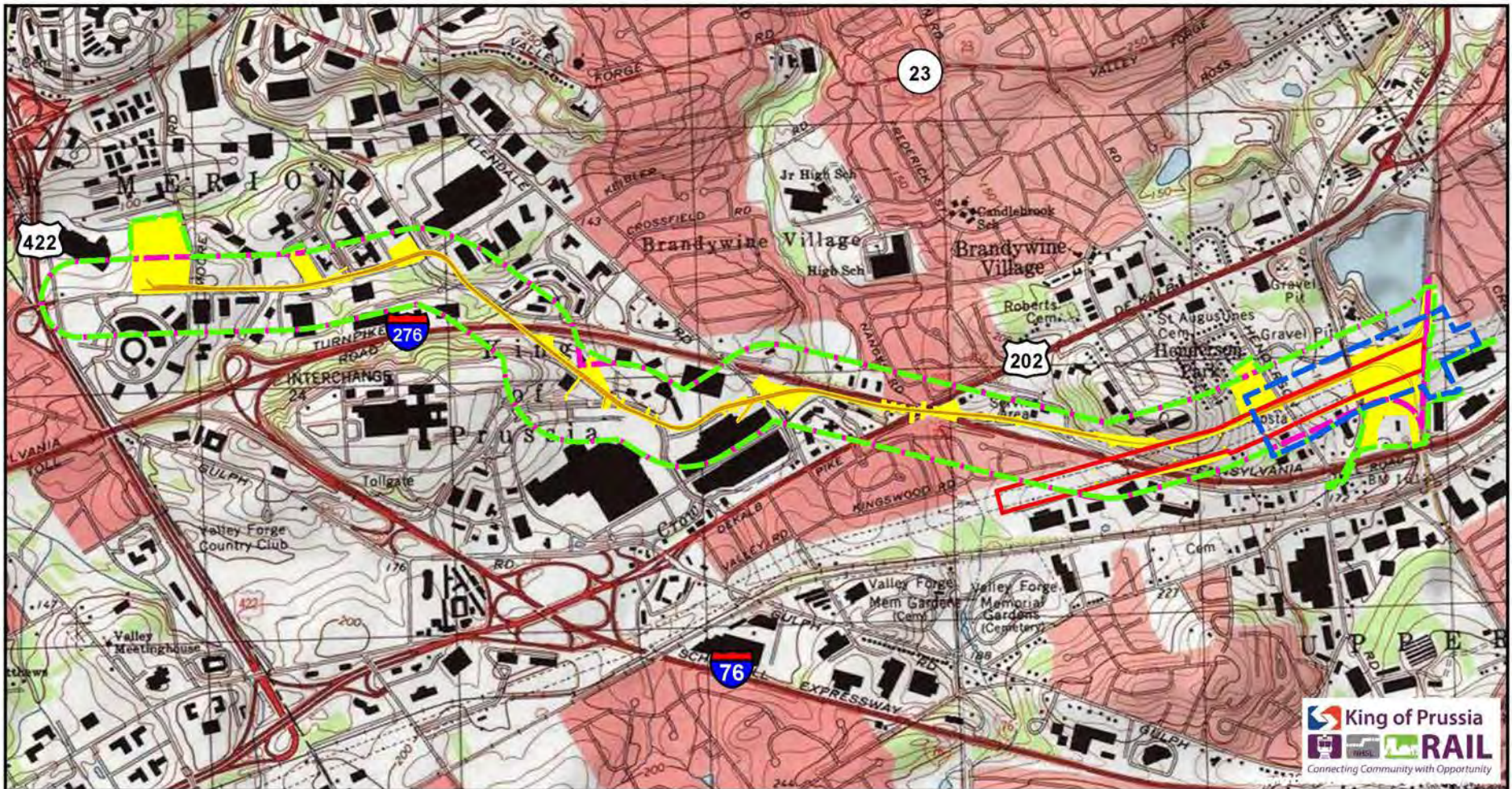
By: _____

Robert L. Lund, Jr., Deputy General Manager

Date: _____

11/24/2020

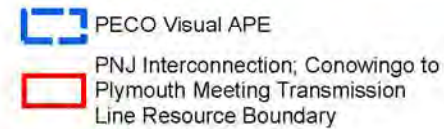
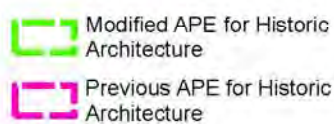
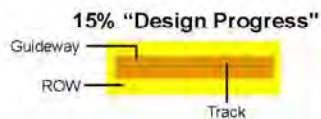
MOA Attachment A – Modified APE Map



Preferred Alternative:

Previous and Modified APEs for Historic Architecture

10/2/2020
Source: Upper Merion Twp, SEPTA, PASDA, DVRPC, AECOM



Roche, Leslie

From: Koenig, Daniel (FTA) <daniel.koenig@dot.gov>
Sent: Monday, December 21, 2020 10:32 AM
To: Diehl, Emma (emdiehl@pa.gov)
Cc: Ryan Judge; Shauna Haas; Tamra Dann; Roche, Leslie; Quinn, Margaret; Timothy Lidiak
Subject: [EXTERNAL] Notification of de minimis impact determination - Pennsylvania Turnpike: Delaware River Extension

Emma,

The purpose of this email is to notify PHMC of FTA's intent to make a *de minimis* impact determination pursuant to Section 4(f) for the Pennsylvania Turnpike: Delaware River Extension for SEPTA's King of Prussia Rail Extension Project (project). As the official with jurisdiction, FTA is required under 23 CFR 774.5(b)(1) to notify PHMC, as the SHPO, of our intent to make a *de minimis* impact determination. FTA made a no adverse effect determination on this property and received concurrence from PHMC on October 30, 2020. A no adverse effect determination on this property under Section 106 enables a *de minimis* impact determination to be made under Section 4(f) because it means that the Preferred Alternative will have no adverse impact on the features, attributes or activities that qualify the Pennsylvania Turnpike: Delaware River Extension for protection by Section 4(f).

As you'll recall, the Pennsylvania Turnpike: Delaware River Extension is part of the Pennsylvania Turnpike Main Line Historic District, whose period of significance is 1938 through 1956. The Turnpike and its extensions were determined eligible for the NRHP in 2005 under Criterion A for association with the post-World War II toll-road movement, and as one of the last elements in a regional system of high-speed, limited-access superhighways connecting northeastern and north-central states with Chicago. The boundary of the historic resource is the parcel boundary. Key contributing elements to the District are features associated with the engineering standards used in the original construction: travel lanes (originally two in each direction); interchanges and toll plazas; tunnels; abandoned sections; bridges, culverts and retaining walls; service plazas; maintenance facilities; and state police stations.

This email serves as notification and documentation only as PHMC has concurred with FTA's determination of no adverse effect for this property. FTA and SEPTA made the Draft Section 4(f) evaluation available for public comment on December 1, 2020 in accordance with 23 CFR 774.5 and FTA plans to issue its final Section 4(f) evaluation in the combined Final Environmental Impact Statement and Record of Decision for the project in 2021. FTA and SEPTA appreciate PHMC's continued cooperation on this project.

Best,
Dan

Daniel Koenig
Community Planner Region III
U.S. Department of Transportation - Federal Transit Administration
1200 New Jersey Avenue, SE
East Building E56-202
Washington, DC 20590
202.366.8224 (o)



United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
5 Post Office Square, Suite 18011
Boston, Massachusetts 02109

December 22, 2020

9043.1
ER 20/0497

Daniel Koenig
Federal Transit Administration, Region III
1760 Market Street, Suite 500
Philadelphia, PA 19103-4124

Subject: Comments
Draft Section 4(f) Evaluation
King of Prussia Rail Expansion Project
Chester County, Pennsylvania

Dear Mr. Koenig:

The U.S. Department of the Interior (Department) has reviewed the revised draft Section 4(f) Evaluation for the King of Prussia Rail Expansion Project in Chester County, Pennsylvania. The Department acknowledges that the Federal Transit Administration (FTA) previously completed a Draft Section 4(f) Evaluation that was included in the October 2017 King of Prussia Rail Extension Draft Environmental Impact Statement (DEIS). That document was subject to public and Department review during the DEIS public comment period from October 17, 2017, to December 8, 2017. The Department provided a concurrence letter dated November 30, 2017, for that document.

We understand that because a new historic Section 4(f) property, the Pennsylvania-New Jersey Interconnection, Conowingo to Plymouth Meeting Transmission Line (PNJ Interconnection), was identified after the DEIS was published, the FTA is re-issuing the Draft Section 4(f) Evaluation for public and Department review in compliance with 23 CFR 774.5(a). We offer the following comments on this project for your consideration.

Draft Section 4(f) Evaluation Comments

The Department reiterates that comments from our November 2017 letter concerning Valley Forge National Historical Park on this project still stand. In addition, the Department concurs that there is no prudent and feasible alternative for use of the newly identified Section 4(f) property, PNJ Interconnection, along the revised rail extension alignment. In a letter dated

September 26, 2016, the Pennsylvania Historical & Museum Commission (PHMC) concurred with the FTA's determination that the project would have an adverse effect on the PNJ Interconnection. Furthermore, the Department acknowledges that through consultation, the FTA, the Southeastern Pennsylvania Transit Authority, and PHMC entered into a Section 106 Memorandum of Agreement (MOA) on November 25, 2020. The MOA stipulates the mitigation measures to be undertaken as part of the project to address the adverse effects of the project to the PNJ Interconnection.

Thank you for the opportunity to review and provide comments on this project. If you have questions regarding these comments, please contact Mark Eberle, National Park Service at mark_eberle@nps.gov. Please contact me at (617) 223-8565 if I can be of further assistance.

Sincerely,

A handwritten signature in blue ink, appearing to read "Andrew L. Raddant", is displayed on a light blue rectangular background.

Andrew L. Raddant
Regional Environmental Officer

cc: SHPO-PA (anlowery@pa.gov)



December 21, 2020

William R. Hartman, PLA
Section Chief, Trails & Open Space Planning
Montgomery County Planning Commission
One Montgomery Plaza, Suite 613
PO Box 311
Norristown, PA 19404-0311

RE: Section 4(f) Consultation for the King of Prussia Rail Project, Upper Merion Township, Montgomery County, Pennsylvania

Dear Mr. Hartman:

The Federal Transit Administration (FTA), in cooperation with the Southeastern Pennsylvania Transportation Authority (SEPTA), published a Draft Environmental Impact Statement and Draft Section 4(f) Evaluation for the King of Prussia Rail Extension (Project) in October 2017. In March 2018, SEPTA adopted the Preferred Alternative, known in the DEIS and Draft Section 4(f) Evaluation as PECO/TP-1st Ave. with the PA Turnpike North South Option. FTA and SEPTA are undertaking a Final Environmental Impact Statement and Final Section 4(f) Evaluation for the Preferred Alternative.

As required by Section 4(f) of the US Department of Transportation Act of 1966, the purpose of this letter is to request your concurrence on FTA's proposed temporary occupancy exception determination for the Preferred Alternative regarding the planned Chester Valley Trail Extension.

Description of Chester Valley Trail and Planned Trail Extension

The regional Chester Valley Trail runs for 13.5 miles in Chester County into Montgomery County and Upper Merion Township to its current terminus on the west side of South Gulph Road. Montgomery County administers this paved, multi-use recreation trail in the township. The County is constructing a 3.8-mile extension of the Chester Valley Trail eastward from its current terminus along the south side of the Township/County's PECO Easement on the PECO utility corridor to the Pennsylvania Turnpike. Before the Pennsylvania Turnpike, the proposed trail will transition to follow along Hansen Access Road eastward until joining the County-acquired former East Penn Railroad LLC railroad corridor. The trail will turn north using the former railway corridor, which continues north along the north-south leg of Saulin Boulevard and across US Route 202 toward Bridgeport.

Section 4(f) Evaluation for Planned Chester Valley Trail Extension

The Preferred Alternative will cross the County's right-of-way (ROW) for the Chester Valley Trail Extension (former Philadelphia and Reading Railroad corridor) at Saulin Boulevard (map in Attachment A). The planned trail will be at grade with the existing roadway. The elevated guideway of the Preferred Alternative will cross over the proposed at-grade trail alignment. Vertical clearance over the trail will be approximately 21 feet. Guideway support columns will be designed to not

impact the trail or its ROW, thereby not requiring permanent incorporation of land from the trail ROW and avoiding operational impact to the trail.

However, SEPTA will temporarily occupy a portion of Chester Valley Trail Extension land to provide work area and access during construction of the Preferred Alternative. Specifically, SEPTA will temporarily occupy a strip of land alongside the existing Saulin Boulevard ROW at point where the Preferred Alternative crosses the trail (approximately 0.6 acre (<0.5% of the trail property)).

FTA intends to make a Section 4(f) finding of temporary occupancy exception, pursuant to 23 CFR 774.13(d), because the Preferred Alternative will satisfy each of the five criteria for such a finding:

- 1) Because the trail crossing is a relatively small work area compared to the overall length of the Preferred Alternative, the duration required to construct the portion of the Preferred Alternative at the trail crossing will be less than the overall three-year Project construction duration. No change in land ownership will occur.
- 2) The scope of the Preferred Alternative construction work at the trail crossing will be minor in nature and magnitude (<0.5% of the property) in comparison to the 3.8-mile length of the overall trail extension. SEPTA will temporarily occupy land within the trail ROW at the Project crossing to enable access by construction workers and equipment to the elevated guideway structure overhead. SEPTA will coordinate with the County regarding temporary re-routing of the trail during Project construction. The land areas SEPTA temporarily uses will be designated as construction work areas; work areas will be secured to protect the safety of construction workers and the public. Other parts of the trail will not be impacted and will remain open to trail users.
- 3) No permanent, adverse physical impact to the trail will occur as a result of Preferred Alternative construction activity. As other portions of the trail will remain open to trail users, and as SEPTA will restore the part of the property and trail it temporarily disturbs at the end of its construction activity, no permanent or temporary interference with the activities, features or attributes of the trail will occur.
- 4) SEPTA will fully restore the land that is temporarily used, including the trail itself.
- 5) SEPTA is coordinating with Montgomery County about the Project crossing over the proposed Chester Valley Trail Extension. By this letter, FTA seeks concurrence from the County on the proposed temporary occupancy determination for the Chester Valley Trail Extension. Written concurrence from the County will be included in the Final Section 4(f) Evaluation. The County's agreement will enable FTA to make a final determination of temporary occupancy exception for the Chester Valley Trail Extension.

In accordance with the requirements of Section 4(f), FTA provided a public notice of its intent to make a finding for the Preferred Alternative of no use of the Chester Valley Trail Extension with an opportunity for public review and comment; the public notice was posted on the Project website (www.kingofprussiarail.com) on December 2, 2020.

SEPTA and Montgomery County coordinated in the development of the following commitments that are integral to the Preferred Alternative and will be undertaken by SEPTA during subsequent Project design to minimize the effects of Project construction on the Chester Valley Trail Extension. The commitments include the following actions:

- During subsequent design, SEPTA will develop the Project design at the crossing of the planned Chester Valley Trail Extension in coordination with Montgomery County at major milestones (30%, 60%, 90% and final plan, specifications and estimates).
- During subsequent design, SEPTA will develop the Project construction plan for the crossing of the planned Chester Valley Trail Extension in timely coordination with Montgomery County.
- During subsequent design, SEPTA will develop a cost reimbursement agreement with Montgomery County to reimburse the County for expenses incurred by the County's engineering consultant or other County consultants deemed necessary by Montgomery County and SEPTA for coordination and services related to: reviewing Project construction plans and specifications; coordinating with SEPTA during Project design and construction phases; and potentially implementing temporary modifications (such as but not limited to: signage, re-routing, restoration, striping) to the planned Chester Valley Trail Extension to accommodate Project construction. All planning and design costs for the Project related to its impact upon the planned Chester Valley Trail Extension, including consultant fees as described above, shall be borne by SEPTA.
- During construction, SEPTA will implement its construction plan in the area of the Chester Valley Trail Extension. SEPTA will coordinate with Montgomery County during Project construction. All costs to construct the Project at the planned Chester Valley Trail Extension crossing will be the responsibility of SEPTA.

Request for Montgomery County Concurrence

To support the Final Environmental Impact Statement and Final Section 4(f) Evaluation, comply with Section 4(f) temporary occupancy exception determination requirements, and to provide a clear record of the outcomes of SEPTA's coordination with Montgomery County regarding the planned Chester Valley Trail Extension, SEPTA requests on FTA's behalf, that Montgomery County reviews the concurrence line at the end of this letter and returns the signed copy digitally to Ryan Judge at rjudge@septa.org. FTA and SEPTA will make your signed copy part of the Section 4(f) record for the Project and your concurrence will enable FTA and SEPTA to complete the FEIS and Final Section 4(f) Evaluation. Your prompt response is appreciated.

If you have any questions or comments, please contact me at rjudge@septa.org.

Sincerely,

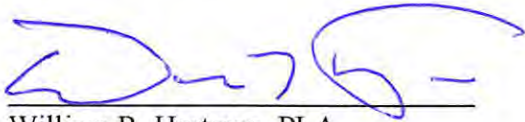


Ryan T. Judge
Manager, Strategic Planning

Attachment

cc: Tim Lidiak (FTA)
Dan Koenig (FTA)
Shauna Haas (FTA)
M. Quinn (AECOM)
L. Roche (AECOM)

Concurrence Line: As the official with jurisdiction over the Chester Valley Trail Extension, I have reviewed the conditions for a constructive use exception as outlined in this letter as well as SEPTA's commitments to minimize impacts of the King of Prussia Rail Extension to the Chester Valley Trail Extension during Project construction. I hereby concur that SEPTA's construction activities for the Preferred Alternative will be so minimal as to not constitute use of the Chester Valley Trail Extension within the meaning of Section 4(f). I understand that concurrence with the FTA's assessment of the impact to the planned Chester Valley Trail Extension will result in FTA making a Section 4(f) temporary occupancy exception determination for the Preferred Alternative.

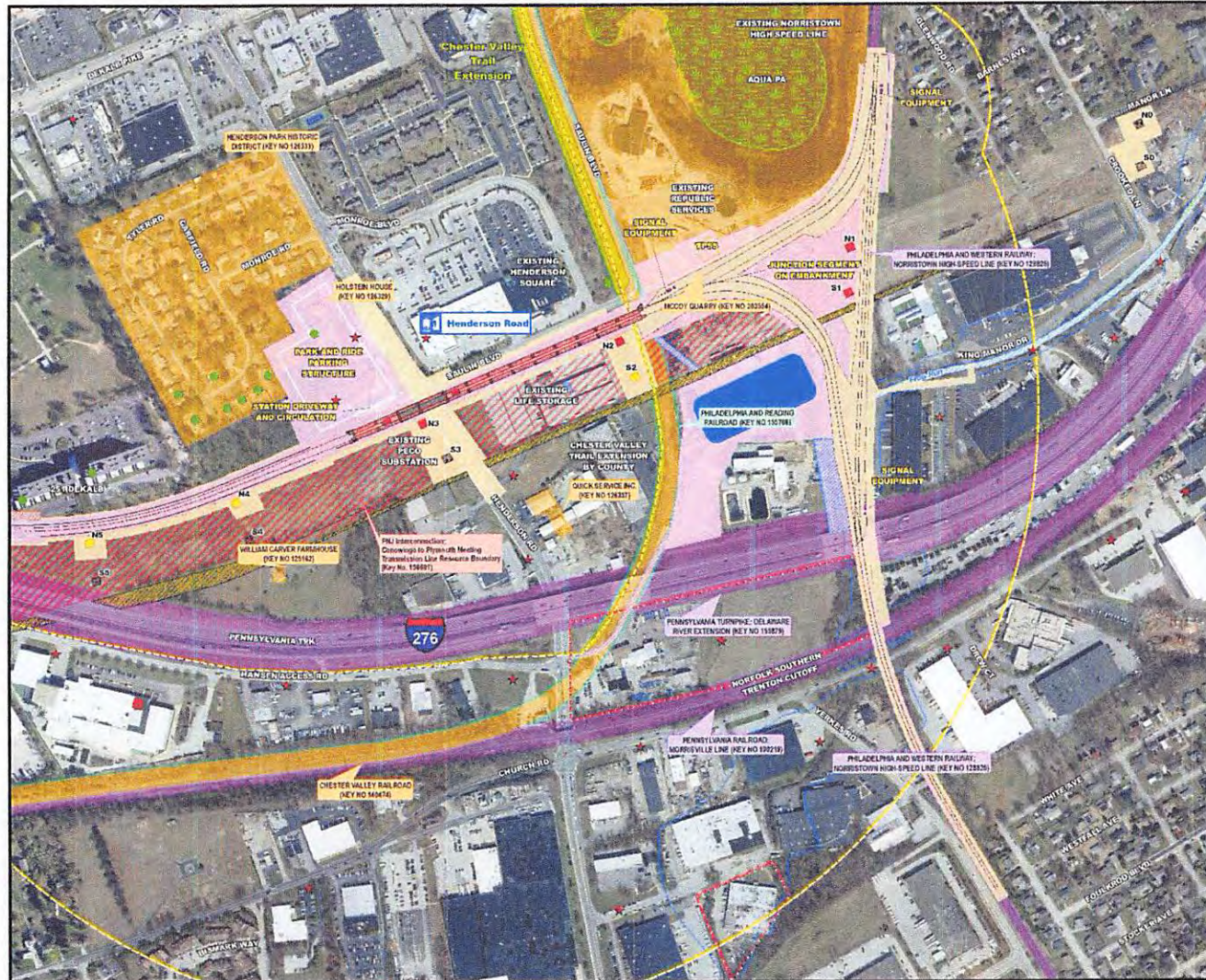


William R. Hartman, PLA
Montgomery County Planning Commission

12.24.2020

Date

Attachment A - Map



Connecting Community with Opportunity

Preferred Alternative: Sheet: 1 of 4

KOP Rail FEIS

Environmental Features	Historic Architectural Resource
Existing / Proposed Chester Valley Trail	Previously Identified
Parks, Recreation & Open Space	Listed/Eligible
King of Prussia Mixed-Use Zoning	Not Eligible
NW Wetlands	Undetermined
NW Riverine	Evaluated & Recommended
FEMA Floodplain	Potentially Eligible

Impact - Noise

- Cat 2 - No Impact
- Cat 2 - "Moderate"
- Cat 3 - No Impact
- Cat 3 - "Moderate"

Impact - HazWaste ★ Hazmat Site

Impact - NPL Site ● NPL Site

Impact - TRI Site ● TRI Site

Proposed Right-of-Way	Proposed Improvement
Permanent Right-of-Way	Project Study Area
Required Drainage Easement	Temporary Construction Easement
Required Private Access for SEPTA	Underground Structure Support Easement
PECO Tower	Right-of-Way to be Transferred to PECO
PECO Tower - Possibly Replace	PECO Tower - Replace

Proposed Storm Water Management	Proposed Improvement
Above Ground	PARK AND RIDE PARKING STRUCTURE
Above Ground - Existing	
Underground	

Aerial Structure	Communication Equipment
Aerial Support Structure	Signal Equipment
Embankment Area	TPSS Location
Pedestrian Overpass	Other Improvements
Station	

Not for Construction, Draft for Discussion.

Date: 12/4/2020

AECOM

0 200 400 Feet

1 inch = 400 feet

Source: 2018 PEMA Imagery, PASDA, PennDOT, HNTB & AECOM

*A*ppendix D Comments Received on the DEIS

- Table of Public Comments Received on DEIS
- Table of Agency Comments Received on the DEIS
- Agency Letters
- DEIS Public Comment Period Summary Report (Note: The content of Appendices A through E of this report is provided in the material contained in this FEIS Appendix D)
- Public Hearing Transcripts

*A*ppendix D

Table of Public Comments Received on DEIS

King of Prussia Rail Extension Project - Public Comments on the DEIS

Comment Number	Form	Topic	Organization/ Agency	Last	First	Comment
1	Hearing	Contamination		Napolitan	Mike	I'm a professional geologist...This line comes off of the main line right beside our drinking water aquifer reservoir at the quarry that Aqua controls. It is also directly down-gradient of the Superfund site that has impacted that quarry in the past, and is currently in the recent environmental review period of that Superfund site, has found more contamination in the ejection well. So SEPTA doesn't even discuss that in their Draft Environmental Impact Statement. They don't talk about how it will affect our water quality that everyone drinks. Whether you have visibility of the train line, whether it's coming past your house, you have vibrations, whatever the issue is, it will impact almost every resident in Upper Merion if this is allowed to happen, because it'll change the conditions that are currently in existence with the Superfund site and our drinking water aquifer...I think that their Environmental Impact Statement is severely lacking; they need to do studies to ensure us that our drinking water aquifer will not be impacted, the reservoir.
2	Email	Fares		Karpinski	Jeff	Item 34 of the FAQ page hasn't been updated to reflect the fare changes SEPTA implemented in January of this year (2017). The fare for both the NHSL and 124/125 buses is now a single token (\$2.00) or \$2.50 cash; a city transpass is also accepted.
3	Hearing	Financial; fares		Cichy	Melanie	An issue not addressed at all that I've seen is the plans for the ever increasing need for parking. Have you ever been to the mall during Christmas time? There's no parking already. Where are the finances coming from? The government grants that we were told would be paying for a portion of the rail do not cover the entire sum, so who is expected to pick up the rest of the bill? Will the new stations have ticket booths to cut down the cost of me purchasing a ticket? Will parking cost money?
4	Letter	Information	Aqua Pennsylvania	Gresehover	Brian	Aqua (Pennsylvania) has reviewed the Recommended Alignment that was presented by SEPTA and compiled a list of the general areas of potential coordination with our existing water utilities as well as future planned water main projects ...We look forward to coordinating with SEPTA to help achieve a successful project.
5	Letter	Information	Pennsylvania Turnpike Commission	Heigel, PE	Bradley	The Pennsylvania Turnpike Commission appreciates the opportunity to comment on your Draft Environmental Impact Statement (DEIS) dated October 2017 for the King of Prussia Rail Project. Over the past several years the Turnpike has met with representatives of the project, attended several steering committee meetings and remains an active stakeholder. As the project moves forward, the Turnpike will require significant coordination to avoid or minimize impacts to our customers and assets. Future design considerations need to avoid permanent facilities located in the Turnpike right-of-way because of our constantly increasing needs, such as adding safety features, increasing capacity, improving stormwater management facilities and adding intelligent transportation systems. The most significant remarks include: minimize impacts to our customers, comply with all Turnpike Maintenance and Protection of Traffic requirements, minimize impact to our right-of-way, and minimize impacts to our assets. The Turnpike looks forward to future coordination and discussions on this project.
6	Maps	Information		Kirse	Eric	(Commenter provided two maps: one with the heading "Yes to PECO/TP-N. Gulph" and the other with the heading "No to PECO/TP-1st Ave")
7	Hearing	Land use		Boyer	Rick	Transit-oriented development allows for an area within approximately a quarter mile or so from a transit stop to be rezoned and redeveloped for a different or new land use, whether it be commercial, residential, open space, recreation, etc...With new stops being proposed in the current developed areas, two stops on First Avenue and two stops at the mall, I would like to see more details and examples on how additional transit-oriented development zoning could not only affect and enhance new stops, but also on current residential stops in Gulph Mills, Hughes Park, and Bridgeport. I feel it's important to maintain and enhance the strength of our residential communities by reserving open space or provide strong recreation areas for our growing families here in King of Prussia.

King of Prussia Rail Extension Project - Public Comments on the DEIS

Comment Number	Form	Topic	Organization/ Agency	Last	First	Comment
8	Email	Non-support		Alexaki	Caroline	I have attended many meetings and I have opposed the rail from the beginning. I urge you to choose a different route for this plan go back to the original blue norfolk southern plan linking to the purple plan avoiding vf. homes and the 9/11 memorial. *AUTHORIZATION🔗: At this time, septa does not have approval from the turnpike to build the rail *COST💰: This rail is too costly and there isn't even a final total on cost. There has been no full disclosure on where septa will get all of the funding. Additional cost for building on northside of turnpike makes no sense. *ENVIRONMENT🌱: At the 11/13/17 meeting, it was brought to our attention that the rail will be near the AQUA water reservoir and that septa may not have gotten EPA approval to run that close to AQUA reservoir. Are there by other environmental impacts along this route? Running the rail at edge of backyards of v.f. homes residents is unacceptable. *USELESS TO RESIDENTS🏠: The rail will not serve the residents; residents can currently take the high speed line from ntn,b.port, king manor , Hughes park,gulph mills etc. Most could park easily at king manor. Since we live here, we can shop the mall and visit the casino any time we wish without a rail line. Shuttles could run from these train stations to the mall and casino. If I were to go to center city, I would go to ntn,paoli or radnor train stations to go directly to phila and avoid 69th street. *SAFETY🚗: The rail running along the turnpike adjacent to the service plaza will be dangerous for trucks and cars entering the service area. The additional cost to build on that side of the turnpike is unacceptable. The rail running down the center of Wills and Mall Blvd will make it unsafe for cars to make right and left turns into and out of COSTCO and TOYS R US. It is already hazardous in that area since there are no traffic signals. Crime will increase ,as UM will become " the edge city" as opposed to staying a township. The rail running 20 hours per day will increase possibility of crime. *👁️👁️ EYESORE: The rail crossing over rt. 202 will be ugly. The rail crossing over Allendale rd will be ugly. The rail running up Wills and Mall Blvd will be ugly. The rail running up First ave will be ugly. The rail running above the 9/11 memorial will be insulting and ugly. The rail running at vf. homes backyards is unacceptable if that route is chosen. 🚒 *SEPTA DOESN'T CARE about UM TOWNSHIP OR FIREFIGHTERS👮: ASKING THE KOP FIRE DEPT TO MOVE THE FIREHOUSE AND THE 9/11 MEMORIAL IS A SLAP IN THE FACE! I hope they deny your request. *TRAFFIC🚗: The buses will still run from the city and the HEAVIEST TRAFFIC will continue to pour into UM from 422 west and 202north,south.
8 (cont)	Email	Non-support		Alexaki	Caroline	The park and ride station at the casino as I understood liz Smith to say at the 11/8/17 vf homes,Brandywine meeting ;would accommodate 1000 cars. She stated that cars from 422 could park there 9 to5, then those parked there could board the rail. I'm not sure how many cars travel from 422 but 1000 is no where near the number of cars traveling that roadway. *IMPACT ON RESIDENTS🏠: We are being told that we should change our lifestyle. Stop driving our cars. Walk to a train that we won't use to visit a city that is becoming increasingly dangerous. We are told senior citizens will have better access to healthcare in phila by using the rail. To ask seniors to get to the rail(hmm, should they walk, bike or drive to the rail) hobble to the platform, squeeze into a seat, stop at 69th st, run from the muggers,transfer to frankford,market line, stop in center city and probably need to get a TAXI to get to the medical facility!👁️ REALLY? Increase in local taxes due to increase in law enforcement and fire,emt . The kop Bid is the driving force for this project.along with real estate developers. The residents opposed to the rail know this. Making First ave a walking center is ridiculous. Why would rail riders take a rail to go to a do nothing area and sit alongside a heavily traveled road? Makes no sense. Um residents have yards and parks. They don't need a small park on first ave that they're supposed to get to by rail. *SUGGESTION✅🗑️: Scrap the plan for UM. FOCUS ON 422 AND 202. where The real traffic is. The rail will not decrease traffic as it is planned. The mall may not survive as shopping is increasingly moving to strip centers. Therefore, there would be no employment there. I'm doubtful that v.f. casino will survive as it is such a small venue. Again,there would be no employment there. The rail does not travel near the new town center..why?? 🤔🗑️*****If this plan is to go forward, reroute it to run via the original blue norfolk southern plan linking to the purple plan to travel to the mall then travel to walmart, town center, CHOP then continue to casino via gulph rd. This will solve many problems; it would include the town center walmart,CHOP ,mall and casino while bypassing vf homes and 9/11 memorial!*****🚗🚗🚗It still does not address the real traffic influx to UM... 422 w and 202s. I am a resident,homeowner. I am a landlord for 3 properties in Brandywine village. I work in the business park in kop.I am a life long UM resident.
9	Form	Non-support		Alexaki	Nick	This rail is too costly; riders can use the current NTB, B Port, King Manor, Highes Park stops. If I, as a resident, want to use SEPTA to reach Center City, I would choose the train not High Speed Rail or go directly to Center City, not 69th Street; why aren't shuttles being considered from these stops to the Mall or Casino? The rail running next to the Turnpike Service Plaza will be dangerous for trucks, cars to enter Service Plaza from the Turnpike travel lanes - 2 crossovers of the Turnpike I feel is costly also. The additional cost to cross over 202, avoid V. F. Homes is too costly and an eyesore! Has SEPTA checked EPA for being near Aqua reservoir? The proposed movement of the 9/11 Memorial and Firehouse is a slap in the face of UM residents! And why did this just come to public attention at this late date? The rail traveling on Wills, Mall Blvd and First Ave. will be dangerous to right, left turns. Money would be better spent adding rail from Reading 422E to KP - This is where the heaviest traffic is. A park/ride at Casino for 1,000 cars (422 car riders to use. This is a joke, 1,000 cars parked there 9-5 will not ease 422 congestion).

King of Prussia Rail Extension Project - Public Comments on the DEIS

Comment Number	Form	Topic	Organization/ Agency	Last	First	Comment
10	Email	Non-support		Auth	David	As a long time resident of King of Prussia and formerly Bridgeport I want to voice my opinion to you that this community does not need and will not support your initiative to build a rail line through our town. I have spoken with many of my fellow residents and they all share my views regarding this project. We will make our voices heard on this subject as loudly as possible.
11	Website	Non-support		Bahn	John	I am against this rail line in our community. I see no need for it and envision nothing but trouble with it's construction (sink holes, labor disputes, noise and congestion caused by the project). I see no direct benefit to our community whatsoever.
12	Hearing	Non-support		Burke	Sarah	I'm here because I am against the Locally Preferred Alternative for the King of Prussia Rail. The reason I am against it is because it is going to affect many residents, specifically those in the Valley Forge Homes neighborhood. And so I implore al of you, even those of you who are for the train, to please state that you are for the design option that brings the train on the north side of the Turnpike, so it does not affect the residents of Valley Forge Homes. I also want to dispute the notion that it is going to raise property value in King of Prussia. There's several reasons I believe this. One of the reasons is because there are studies that have been done specifically involving light rail and they say that in order for property values to increase, homes have to be within a quarter to a half mile of a station, and usually the biggest property value increase is within a quarter of a mile of any station. The current five proposed stations are not within a quarter mile of any residence in King of Prussia...Additionally, most of them, I think all of them, actually, would not currently be walkable. So this would require significant investment for King of Prussia. SEPTA states on their talking points that regional rail does increase property values in towns where the rail services, but the light rail, the Norristown High Speed Line, is very different from the regional rail. The regional rail is a one-seat ride in order to get to Center City Philadelphia, and the Norristown High Speed Line is a two-seat ride from King of Prussia...And then finally, what I would like to say is that there are currently already three stops concerning the Norristown High Speed Line...all of the homes in King of Prussia are already within three miles of the Norristown High Speed Line, so this would increase our property values.
13	Hearing	Non-support		Cichy	Melanie	I have been a resident of King of Prussia for seven years. I love public transportation but this proposed rail is a bad fit for this community. There are several problems as I see it: There's poor planning with Town Center. It's out there, there's tons of new apartment buildings and it's completely cut off from the rail. The actual destination of the rail goes to 69th Street and then you need to transfer to actually get into Center City, where a lot of people would actually want to go. Personally, I would never use this rail becasse for me it would be easier to drive to Radnor, to park there and take the Paoli-Thorndale Line, and it's actually cheaper, too. I did a whole analysis and out it's going to cost me \$9.25 to go to the airport using the Paoli-Thorndale Line versus \$9.75 to use Norristown High Speed Rail with all the transfers; and it's also quicker for me to take the Paoli-Thorndale Line versus Norristown High Speed Rail with all the transfers. I keep hearing the phrase "bolstering the economy." It's completely speculative. There's no one that can know what the future will hold. It's only predictive and hopeful. There are tons of different roads that filter into King of Prussia...this one specifically addresses just from the Philadelphia area does not address the ton of traffic that comes from other areas. Why wouldn't SEPTA propose rail from other areas to come into King of Prussia as a way to actually sustain this area and decrease congestion? I saw there's two parking spots available, but then there's stations along the way that don't have parking available. As a resident, I would want to use the ones in the middle rather than have to go to the end lines.
14	Website	Non-support		Matour	Dan	There should be a stop near the Wegmans or at least have easy access to the new Town Center. The business park doesn't need two stops. Also by the time this is completed - 10 to 15 years - driver less cars will be common and reducing congestion on 76. This is a waste of money and resources.

King of Prussia Rail Extension Project - Public Comments on the DEIS

Comment Number	Form	Topic	Organization/ Agency	Last	First	Comment
15	Hearing	Non-support		D'Angelo	Teresa	My current home is in Valley Forge Homes. We are on Powderhorn Road; Powderhorn is part of that "low impact to residents." As as low as your number will be, I don't want to be that number. So, that needs to be into the consideration. We need to get this number down to zero, not to "low." We do appreciate that you're looking at the other side of the Turnpike. If it does go through, we're hoping that's where it would go, the other side. But again, as many people have said, I don't think it's going to lessen the traffic either. The sight of it, the sound of it, not thrilled with any of it. People parking at the mall to get onto the train, that's just going to cause a lot more car traffic when they get off the train. That's going to create traffic, parking issues, security, all of that. Again, other people are commenting on 69th Street. It's gross down there. I wouldn't want to transfer there either. I think the only people that it's going to benefit are the real estate developers, the large businesses. They're the only ones who are going to benefit. I don't see residents benefiting from this, so I would hope SEPTA could put themselves in the shoes of us residents and see why the majority of us are against this.
16	Website	Non-support		Davis	Donna	I appreciate the desire to have public transportation from Phila to KoP. And I know in my heart this project will come about no matter what I say. However, I have a few concerns: 1) Noise levels 22 hours a day passing close to neighborhoods that may not be the most expensive in the township, but were among the first to be developed back in the 50's. The newer, higher end areas of the township are immune to these disturbances; 2) Noise and vibration during construction. Will construction be 24 hours a day? Even if it isn't, there will almost definitely be affects on the houses located near the construction including but not limited to cracks in walls and possibly foundations, sink holes may open up. As a home owner, I never expected to have this worry and who will foot the bill for these damages and will we have to prove these damages happened due to the construction? Fear of years in court to maybe get reimbursed for these possible damages is scary. 3) Traffic in the Henderson Road and VF Casino area. Since these 2 areas will have parking facilities, how can traffic NOT increase and become gridlocked in those areas of the township? More shuttle buses on the roads in the business park area, especially with the road diet on First Avenue? I find it hard to believe business people will walk from the train station to some of the business farther away, especially in inclement weather. 4)Paying for the project should not fall on the shoulders of township residents at all. Let the organizations benefiting from this absorb the costs. 5) Traffic restrictions during construction of the line over Rt. 202 and Henderson Road will cause gridlock in the township. What type of plans will be in place to make this NOT happen. I worry what was once a nice family place to live is becoming an area geared toward what everyone thinks Millennials want. However, they are just one part of the people living here. Remember there will be others after the Millennial group moves on to their next adventure.
17	Form; hearing	Non-support		Fluehr	Ana	Do not agree project to be done. Investment can go to improve SEPTA customer assistance services such as building website, improving condition of transportation and employed more people at SEPTA facilities to provide customer assistance services, bus line Norristown (desk?) is needed. Investment can be done to improve the road condition, properly maintained sidewalks, build the sidewalks that are missing, example DeKalb Street, east Norriton, access Chick Fil a is the section where is the need for sidewalk, people on the grass on that area. Application of stem cell research to cure spinal cord injury is done in China application of stem cell thereapy (including my research paper). Fire company considered it as not safe project by the speech I had listen on 11/13/17 of King of Prussia and professionals in geology consider it as the factor of contaminating drinking water.
18	Letter	Non-support		Fluehr	Ana	I am against the 1.2 billion dollars King of Prussia Rail. The main reason is that the project is expensive, and Montgomery County can use that investment in some other area that have high need for improvement that I would explain.

King of Prussia Rail Extension Project - Public Comments on the DEIS

Comment Number	Form	Topic	Organization/ Agency	Last	First	Comment
19	Hearing	Non-support	King of Prussia Volunteer Fire Company	Forster	Mark	I'm speaking on behalf of the King of Prussia Volunteer Fire Company this evening...The Board of Directors of the volunteer fire company would like to advise the residents, businesses and visitors to our area that your safety is our primary concern. While SEPTA's met with some board members to explain their ideas, the board of directors is not supportive in any of the proposed situations that affect our property or our operations. In the development of the most recent report, at no time was the fire chief or the administrator, the leadership of the fire company, consulted about potential impacts and issues upon the public or the fire company property. Their environmental impact study is slightly flawed. There is no mention of public safety anywhere in the study.
20	Hearing	Non-support		Forster	Pamela	...According to the district's top ten economic development projects, only one of them will be one of the stops along the rail, which is the King of Prussia Mall. The other ones are mostly in the Village or 251 DeKalb, and other locations that the rail would not be stopping at. Additionally, being a resident of Brandywine Village, on the 3-D map where you put your house in, when I look out my front porch I will see the rail. No longer will I be able to see the sun setting...I did not buy my house for that reason...I don't see how we will decrease traffic...Between now and 2035, the district reports that 4,000 new jobs will be created...Additionally, with the increase in the properties that are going in, we will have 6,000 more residents. So, again, how is that going to help our traffic?...There's a thing out there right now called PACarpool.org that DVRPC has on their website with potential tax credits if you carpool. Maybe that's an option we should be looking at and putting a million dollars into a campaign for rather than \$1.2 billion into a rail.
21	Website	Non-support		Funkhouser	Shirley	<p>I oppose the King of Prussia Rail Extension. My main objection is the expense - too much money for too little benefit. If SEPTA can get its hands on over 1 billion dollars, I would think you could better serve more people that bring people to a mall. The proposed route only helps the mall, 1st Ave area and the Casino. Please be honest. We already have access to public transportation - easy drive to regional rail stations, plus three stops on the Norristown High Speed Line within our township borders. If there was an abundance of workers interested in public transportation, why don't we hear about a need to expand the current Connector service? Why not improve and expand parking at existing stations? SEPTA can't even keep up the maintenance on what it has. Aren't there areas of the Delaware Valley that have no rail service and would benefit more?</p> <p>I have been to many of the public hearings. It was obvious at the last series that residents don't matter. Individuals only received two minutes to speak, but business and organizations received three minutes. It was disappointing to see so many of those organizations just parrot the talking points provided by those with the money and clout. Like that business man is really going to take the rail to Center City for his meetings! Come on, he's not going to want to transfer at 69th St. He will still want a town car to drive him or he'll send someone else. Those of us in the community who will have to carry the burden of this project are not valued. Yes, you listen - now. But when were residents asked if they even wanted a rail brought into their community? We weren't because we don't matter. That is painful to accept. As a 47 year King of Prussia resident, I have witnessed the growth of our community over the decades. I spent many years working in the city. I used public transportation, driving to one of the stops on what used to be called the R5 and R6. That was a single seat ride into Center City. So I oppose your reason that we need this rail extension to give residents better access to the city. Sure, it is sad to see people loose their homes. Yes, bringing more people into a community will probably bring more crime just because of the numbers. No one likes someone else to make decisions that affect them. Planners get to play a real life SimCity with our hometown without feeling the pain. That is not right. I've run projects. I know the game you play to make stakeholders think they are being heard, how to massage cost benefits to sell an idea. I asked years ago to be shown where those making the assumptions have been right in the past. I see too many flawed assumptions about this project. King of Prussia has already made the transition from a quiet suburban community at the crossroads of several major highways. This has led to much business development. It all happened because we are in a good place with a lot to offer. We don't need a rail to make us bigger and better. Besides, who says we need to be bigger and better? Only the greedy businesses or those who feed off of power, who come and go profess a need for a rail. Personally, I don't want us to risk our ability to maintain the uniqueness and quality of life we already have. When will someone have the guts to say enough is enough! No KOP Rail!</p>

King of Prussia Rail Extension Project - Public Comments on the DEIS

Comment Number	Form	Topic	Organization/ Agency	Last	First	Comment
22	Hearing	Non-support	Valley Forge Homes Civic Association	Groff	Susan	As a long-time King of Prussia resident, I would like to formally state my concerns about this project. It seems as if the only people it will benefit are the businesses in King of Prussia, the mall, the casino, and the workers that will come from the city, Upper Darby and Norristown. There is a lot of talk about how the rail will increase commerce and increase property value, but that will only affect the people who own the businesses being able to pay low-wage workers and the developers who will build apartments or condos closer to the train station. If the board of directors chooses to pick the original LPA that hovers along our backyards, that will seriously decrease our property value and will change our neighborhood for the worse. I don't see how this high speed line that goes into one of the worst suburbs of Philadelphia is going to be appealing for any suburban person who wants to commute into the city. It's inefficient and quite possibly dangerous for people to have to transfer in such a rundown and insecure location just to get to their location downtown. Many people don't want this train here at all. It's not going to help the residential community, only the business community. I personally will never take the train, because of where the transfer is to complete the trip into the city. I especially do not want this train in my backyard, as do many others in Valley Forge Homes, but if it has to happen because the powers that be with deep pockets want it to happen, then it needs to be on the other side of the Turnpike, the Alternative North/South Option. That is the only vaguely acceptable option for our neighborhood. And, in addition, the video shown during the open house did not show the LPA that runs directly behind our homes. According to the DEIS, that original LPA still exists as an option. People need to see that option if it's still a possibility. Only showing the design alternatives is not transparent. People need to see how this can affect our homes. Show that video and you may not get the same support.
23	Hearing	Non-support	Valley Forge Homes Civic Association	Halem	Pamela	I want to first say that we (Valley Forge Homes Civic Association) are vehemently against the high speed rail being built in our backyards as planned for the recommended LPA, the original design. SEPTA has been kind enough to give us an alternative, which is the North/South Option. If this project goes through, that is, we would want the North/South Option so it does not go behind our 29 homes in our lovely little community. Secondly, we have met several times with SEPTA to discuss our concerns, and most of them are safety-based questions regarding construction as well as with the train...AECOM, the engineering firm, working on this particular project did bad work for SEPTA back in 2009. There was a complaint for a lawsuit that was successful...where SEPTA claimed that AECOM was negligent in their design...that if they had proceeded with the design, a train would have run into a wall...We would like to know and have this addressed in the DEIS, why they're using the same engineering company that SEPTA claimed caused increased construction costs, design errors and delays. It also made SEPTA have to pay out \$10 million in settlement fees to all those subcontractors on that particular project. The suit alleges the firm's design clause would have endangered the safety and welfare of SEPTA's ridership, the surrounding community and members of the public. So, we want to know why AECOM was brought on this project to help plan it in the first place, knowing its past mistakes. And what SEPTA will do to ensure the safety of the public will be in the forefront of their designs going forward. We would also like to know how SEPTA will qualify the chosen engineering company that will compete the design. Furthermore, we would like a commitment from SEPTA to use the most technologically advanced rails, cars, and construction techniques available at the time of construction that will reduce vibration, sound, and visual impact to our community.
24	Form	Non-support		Holzinger	Kathy	I am not in favor of the King of Prussia SEPTA Light Rail. If this project does go thru I would like the rail to be put on the north side of the Turnpike (rest stop side) of the Recommended LPA. My biggest concerns are property value decline, loss of privacy, noise levels, dirt levels, vibration affect on foundations of home and on plumbing, sinkholes.

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25	Letter	Non-support		Holzinger	Kathy	I am writing to you about the SEPTA King of Prussia Rail Project and how it will have a negative impact on my property. My reasons are justified and deeply personal as I will be idrectly affected. First no one should ever have to walk around their home and wonder day after day where their lives will be if SEPTA puts a train on their property. This situation has caused me major depression and undo stress. It has affected my health and my wellbeing. No one should have their home taken from them for the express benefit of others or the so called common good. I'm sure others who are in favor of this project would have a different perspective if their home was in the cross hairs of this project. I believe if this project happens real estate values in King of Prussia will increase dramatically while our home values along the rail will decrease. I feel that the homes involved are entitled to monetary compensation for the inconvenience and negative effect this rail will have on our daily lives and property value. If sometime in the future I should decide to sell my house the value of my home will be greatly impacted in a negative way becasue no one will want a house with a sound barrier and a train in its back yard. My home is the single most important investment I have made in my life after and next to my children. Second and just as important is this project could result in ground instability causing sinkholes. Foundations built on concrete slabs could be adversely affected causing damage to plumbing that is beneath the concrete slabs. Vibration from trains will also influence plumbing and ground stability. Who will assume responsibility for damages incurred during and after this project? Thirld the route directly behind our homes in Valley Forge Homes will destroy wildlife habitats and directly affect the quality of life for humans who breathe the dirt from the trains and the noise every twenty minutes from trains going back and forth. Also, the visual of the train thirty feet or more in the air will impact anyone wishing to look at blue skies and puffy clouds. The privacy of my back yard will be compromised. People riding the train will be able to look down and see every detail of my property. This is a direct invasion of my privacy. When someone wishes to go to sleep early in the evening they will need to wear ear plugs to drown out the sounds of a train right next to their house. Also, the lights from the trains at night will be problematic. If there is a derailment the chances of that train landing on my home could be a distinct possibility. Fourth this should and can be a win win situation for everyone involved. If SEPTA and the Business Coalition are truly and honestly thinking of the community, they will reconsider the routing of the light rail line and put it on the north side of the Turnpike (rest stop side). It will not directly affect homeowners and their property. It will not disturb the 9/11 Memorial. Hopefully it will have less chance to cause sinkholes on people's property or structural damage to their homes (plumbing, foundations etc.) But that possibility will still exist due to the area being prone to sink hole activity. Even though I will see, hear and feel the train it will not be on my property and I will try to deal with that arrangement. I still won't like it, but I will try to live with it. I appreciate that you personally have done what you can to try to mitigate the situation and obtain a result that will be acceptable to all concerned. I thank you for that.
26		Non-support		Holzinger	Kathy	I am against the SEPTA King of Prussia Light Rail. The best I can hope for is that this route will be put on the north side of the Pennsylvania Turnpike at the rest stop side...I want to keep my home and I want to keep the value.
27	Hearing	Non-support		Jones	Jim	...We currently have what I consider to be an adequate transportation system in and out of Philadelphia, which I used for 30 years without much problem. This rail only duplicates what is already there at a monstrous cost. The hours of operation are going to be a problem because of the noise and everything else that emanates from it. And, lastly but not least, it only appears that the mall, the casino, and the industrial park benefit from it not the residents, then why does anybody else have to pay for it? The mall, the casino, and the industrial park should be the lone payers for this white elephant if, in fact, it goes through.
28	Email	Non-support		Longo-Gilligan	Paula	I think is it irresponsible for SEPTA to destroy our town with the construction of this new proposed line called KOPrail. WE ARE NOT A CITY therefore we DO NOT NEED a Rail Line! We do not have the space nor the desire to have this smack in the center of town. I do not believe this will NOT do away with the Bus traffic or SEPTA Connect Vehicles as promised. It will ONLY create additional congestion and anxiety of we the KOP Residents. The Residents who's opinions and comments are NOT taken seriously and ONLY taken for the record but not even entertained. I am a resident and have NOT receive any additional mailings or comment cards since the initial distribution back in 2015/2016. I have attended multiple meetings and our feedback is NOT taken seriously. Its at best disrespectful and your "informational meetings" are nothing more than "dog and pony" shows. I am hopeful that this does not come to pass and you will be forced to conduct your rail line on the outskirts of town which for me would be a win win situation. The traffic coming East on 422 in the AM and going West on 422 is horrendous. SEPTA would be better served to connect the 422 corridor to the thriving KoP , Conshohocken, and Main Line business communities and providing a connection to the Regional Rail Lines along the Schuylkill River to the Manayunk/Norristown Line on along side 422 Upper Merion/Trediffryn township line to the Paoli/Thorndale Line. This would be much less residential interference or impact rather than the proposed track/plan.

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29	Website	Non-support		Luttrell	Mariss	We are somewhat new residents to King of Prussia and oppose this rail line. It is going to create more traffic and congestion with very little benefits to the residents.
30	Website and Hearing	Non-support		Marchese	Warren	The proposed extension of the Norristown High Speed Line does NOT benefit citizens of Upper Merion. It only benefits the businesses that are pushing for its development. We aren't just a mall and a casino, we are a community! Recently I witnessed that more than two dozen children at my kids elementary school, here is King of Prussia, that were sent to school with no lunch. The school does their best to at least give them a cheese sandwich to help them through the day. How many thousands of families could benefit from the 1.2 billion dollars proposed for this project. The major benefactors should not be a mall or a casino, but an entire community. Adding rail to King of Prussia is another way businesses are driving the transformation of King of Prussia from a town to a city. It will cause the irreversible destruction of our beautiful community. If I wanted to live in a city, I would move to a city. Rail lines are extremely rigid. Once they are constructed, they can not be changed. As the needs of the riders change, the rail can not. Transportation technology is advancing at an extremely high pace. Ride sharing automated vehicles will be taking groups of riders door to door on demand rather than from station to station. Rail riders will always need to figure out the the first and last miles of their trip, no matter what the weather. I have been to most of these rail pep rallies. It has always be marketed as something that is a done deal. I have never seen the option to vote against it. To be fair, all rail presentations and proposals should have a place for residents to say NO to the entire project. Conversely, across the United States, rail lines, whose time has come and gone, are increasingly excellent sources of land to be converted to healthy hiking, running, and biking trails. I am live in King of Prussia, NOT Moorestown, NJ.
31	Form	Non-support		Marchese	Warren	Stop trying to turn my town into a city.
32	Website	Non-support		Mayberry	William	As a life-long Upper Merion resident, I am 100% opposed to this project. Upper Merion is too URBAN as it is; this will DESTROY Upper Merion's existing suburban quality of life. The residents of this township did not ask for this rail. We do NOT want this rail. Stop trying to IMPOSE this rail on us! Put the residents of THIS township FIRST; stop catering to outside business interests and NON-residents.
33	Website	Non-support		McCann	Barbara	As long time residents of king of Prussia, my husband and I are NOT in favor of the proposed rail line.
34	Email	Non-support		McKenna	Tom	We the life long residents of King of Prussia don't want the proposed rail extension. Septa every year operates with a budget deficit and is always asking Harrisburg for more money so I don't see this being done without more of our taxes being wasted. This project only caters to the business community and disregards the quality of life issues on the local residents! Another boondoggle Septa project!
35	Website	Non-support		Pollack	Michael	This is a terrible idea. Septa is not even able to properly run the lines it already has. Why reward their incompetence?
36	Email	Non-support		Rathore	Dinesh	Here are my comments: 1. The resident(s) views should be given priority. People who seem to be in favor are business(s), and people who will be coming to the Mall. They will not be living or facing the consequences of the collateral issues (trash, noise, and public safety issues). 2. I reside in Hughes Park Neighborhood and as the attached pictures show garbage is NOT collected regularly. In addition, the residents living close to SEPTA stations deal with this on a daily basis. If these services are disrupted and waste is not properly handled and disposed of, it will attract pests and bring potential for disease. I moved in this neighborhood in 2007, and now I wish I had not. Believe, SEPTA care of its stations is shoddy to say the least. I have been to bus stations and trolley station under SEPTA control and the situation is more or less the same. 3. The new rail line will have a DISASTROUS effect on the township and for the residents (particularly living in the area of the proposed line) be a nightmare. 4. It is for these reasons stated above, I am NOT FOR KOP RAIL PROJECT.
37	Website	Non-support		Rosier	Matt	I work in KoP. I used to live here. I come here on weekends as well for leisure. Mall traffic is bad enough as it is. I would only support this if the current average volumes do not increase further. If this can be promised, then I support. If not or projected to increase I strongly oppose.

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38	Website	Non-support		Royle-Weest	Linda	Went to meeting Mon. I hope that residents comments are as meaningful as commercial ventures. One needs to remember that they represent financial interests although the speeches talk to other things. from your own brochure Why King of Prussia Rail. areas not served. The only area maybe not served is the casino. Mall is served. New Town Center isn't even on your radar. I went there last Fri. afternoon and you couldn't get a parking space. One meeting last yr. when someone mentioned this we were told not enough foot traffic. This area isn't even completed and look at the use. Access to medicals. What medicals? If I'm sick I certainly wouldn't take this to 69th St. and then subway to get medical attention in Phila. Likewise statement about educational institutions. Many going to Temple etc. take the train. Going to Valley Forge Park. If all you want to do is go in the visitor's center it works but you certainly can't walk around the entire park. Need a car. Real estate values. Everyone talks of this but where is the proof? If this is the case all these people who want the rail should be buying up properties in KOP now before they can't afford them. Taxes. Phila. has tons of service but look at their taxes. Likewise mention of helping schools. Philly's are terrible. Congestion: there will still be lots of traffic from 202, esp. 422 and the turnpike. As a resident I don't see any advantage to me that I don't have now. Last yr. after a meeting the Phila. Inquirer wrote an article stating that the travel time would only decrease at the most 10 min. and riders didn't seem unthused. \$1+ billion is a lot of money for 4 miles when there are bridges falling down and roads full of potholes. I also resent all the talk of it helping Montgomery Cty. Why should the residents of KOP bear the burden for the entire county? Also I believe that Septa doesn't have any skin in the game, another words no money from their pocket. And lastly if everyone wants to ride the rail why can't Septa make money instead of being in the red all the time?
39	Letter	Non-support		Scandone	Gina	As a lifelong resident of Upper Merion Township, I am writing to enthusiastically not endorse the King of Prussia Rail. I believe that the King of Prussia Rail: will not provide residents of Upper Merion Township/King of Prussia with better access to jobs, cultural amenities and more. All of these amenities are accessible to residents via automobile or a short walk. Given that the proposed two stops are the King of Prussia Mall and the Valley Forge Casino, what this claim should read is that it will provide the Retailers and those individuals who commute from the city to work at the Mall or at the Valley Forge Casino better access to these two areas. Also, given that the proposed rail will not be going anywhere near the new Village Town Center & Valley Forge National Park, this is not a valid claim. Will not increase commercial real estate values which will help keep my resident taxes low. The opposite has been proven in other states with regional rail lines. Will not reduce traffic and shorten commute times. Given that potential riders will have to drive to one of the many rail stations proposed for the installation in King of Prusia, this is not an accurate claim; it will actually add to the existing traffic situation. It may potentially shorten commute times for those individuals who currently utilize SEPTA as their means of transportation from the city to the suburbs. Will not improve air quality and reduce pollutants. Will not provide savings on gas and maintenance of vehicles. Seriously, SEPTA, I think you're grasping at straws on this one. Will not add value to homes in proximity to the stations. The opposite has been proven in other states with regional rail lines. Will not address the growing mobility needs of my neighbors and seniors, people with disabilities, and millennials. Newsflash - GVF Transportation provides The Rambler, other options include TransNet and, of course, SEPTA has SEPTA Paratransit. Millennials prefer UBER and LIFT and/or have a car. King of Prussia Rail is an infrastructure project that should be ignored. The Philadelphia region needs to invest in bringing current infrastructure up-to-date to help reduce the burden of highway congestion and provide better access to job opportunities, cultural amenities and more. SEPTA has not provided enough evidence to show how the residents of Upper Merion Township/King of Prussia will benefit from this proposed project. This project will only benefit the retailers with businesses in Upper Merion Township/King of Prussia and SEPTA, who clearly stated in their meetings, that they need to reduce their poor commute times from the city to the suburbs (how did this become the residents of Upper Merion Township's problem). Also, the burden of paying for a significant portion of this proposed project and the upkeep, if passed, will fall on the taxpayers of Upper Merion Township!! I do not endorse this project and have encouraged others to join me!

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Comment Number	Form	Topic	Organization/ Agency	Last	First	Comment
40	Letter	Non-support		Scanlon	Susan	I want to reaffirm that I hope SEPTA will build KOP rail on the North side of the PA Turnpike, where the KOP Service Plaza is located and not on the South side behind our community where it will affect 29 homes in VFHs....I was happy living in the KOP house from 2006 up until I learned about the KOP rail project (2012/2013). When I bought my house in VFHs, I had no idea about this proposed train project. Because of this train, I feel like I have an axe hanging over my head and now I don't know what to do. Do I stay in my house or pack up and move again after making major home improvements to my KOP home? Do I feel like moving again at my age? Not really. How would you like to be in my shoes or have your own Mother in my situation? I can tell you it is very stressful! If I wanted to live in a major Metropolis, I would have moved to Center City Philadelphia and not to King of Prussia! It has also come to my attention that Robert C. Hart, General Manager of the KOP Mall issued a Memo dated November 15, 2017 to "KOP Mall Tenants." The memo begins with, "We encourage KOP Mall employees to write a letter of support to Liz Smith, SEPTA Project Manager or email to: info@kingofprussiarail.com. Attached is a flyer for more information and a sample letter of support." Next: A sample letter is addressed to you and the first sentence reads: "As a resident of Upper Merion Township I am writing to enthusiastically endorse KOP rail." Last sentence reads: "I endorse this project and encourage others to join me!" While there are residents of Upper Merion Township who work at the KOP Mall, I'm sure that most KOP Mall employees live outside of Upper Merion/King of Prussia. This letter is very deceiving and disgusting. It shows me that the King of Prussia Business Improvement District (BID) will stop at nothing in order to get this KOP rail through. Mr. Robert C. Hart is spreading false information. Who is going to monitor individuals who actually live in KOP and those who live outside of Upper Merion Township? On another serious matter, there are big concerns over the water supply for KOP. SEPTA is not walking on solid ground near the Henderson Road Superfund Site and the Upper Merion Reservoir. Good, clean water is essential for everyone and not just for a select few. The Local Preferred Alternative crosses within a few hundred feet of our drinking water reservoir on Saulin Blvd and within a few hundred feet of contamination from the Henderson Road Superfund site. This is a very frightening situation so I can only hope that SEPTA thoroughly investigate the impacts on the groundwater recharge and flow around the reservoir. I'm also very concerned about the many sinkholes throughout King of Prussia. I can't imagine if this rail project is actually built on the south side of the PA Turnpike what it will do to the foundations, plumbing, walls/ceilings and windows of the 29 homes that would be impacted by the construction. It is my opinion that this KOP rail will have a very negative impact on the residents of Upper Merion whether the train is near or far from their homes, and it will not improve everyday living in the Township. As I stated before, this rail will not have the ridership you expect and people who have a car will continue to drive their car to wherever they need to go. These individuals will not rely on public transportation. Although we're not to talk about the issue, more crime will flow into Upper Merion with the rail and it will not alleviate traffic congestion. Again, I implore SEPTA to put the KOP rail on the North side of the PA Turnpike and not in the backyards of the VFH residents whose houses will abut right up to the train!
41	Hearing	Non-support		Scanlon	Susan	The Valley Forge Home residents prefer to have the proposed King of Prussia Rail be placed on the north side of the Pennsylvania Turnpike, where the King of Prussia service plaza is located.
42	Form	Non-support		Seilfor	Doug	Stupid idea, ugly, waste of money. Focus on improving exist rail system instead.
43	Letter	Non-support		Sicilia	Kathleen	As a 30 year resident of Upper Merion Township, I am writing to enthusiastically oppose the King of Prussia Rail. Among the many problems I foresee for residents are: no decrease in residential real estate taxes, no guaranteed increase in home values, increased crime, additional congestion to local roads at high traffic times from riders leaving rail stations, increased local commuting time for residents working in the township due to traffic congestion, increased cost of gas and maintenance on vehicles of residents who work locally, provide my neighbors and me better access to jobs (only if I work outside the township and take the train to work), increased cost of necessary additional police and fire protection. King of Prussia Rail is a hazardous and strife laden project that cannot be ignored. Local residents have no responsibility as far as the Philadelphia region needs. Nor are we responsible for the burden of the highway congestion. Those coming into the township to work at the mall are working for minimum wage or just above it. Given the choice they will seek the cheapest mode of transportation necessary which may not be the rail. In addition, given the growing opioid problem in the country and forecasted increase in crime (theft, robbery, prostitution) I foresee the new stations quickly becoming urine soaked meccas for these crimes to occur. I have lived, worked, volunteered, and worshipped in this township for almost 30 years. I moved from both the Philadelphia and New York City areas seeking a more rural setting. Had I wanted to live in a place with an elevated rail system I would have stayed in the City. My home was originally meant to be a starter home but given the schools and the small town community atmosphere I chose to make it my long term home. I am saddened by the idea that this may change. I oppose this project and encourage my friends, neighbors, and others to join in!

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44	Website	Non-support		Tini	Vincent	As the vast majority of Upper Merion residents feel, this project will disrupt the landscape, create noise and spend millions more than an absurd initial projection to benefit the few. Keep the buses and spend the money fixing the existing infrastructure. We don't want the rail.
45	Website	Non-support		Travethan	Terry	I do not want the king of prussia rail extension. As a resident it will not add value and significantly detract from the small town feel of my community, where I have lived for the last 34 years.
46	Website	Non-support		Vensel	Elena	NO to this project, regardless of the proposed options. While this may seem like a good investment strategy, overall this is an incredibly negative impact on nature, and on health and security of the people calling KOP their home. There is nothing green in bringing tons of concrete in and around already overcrowded space around KOP. Not only we have an increased traffic and pollution caused by new construction of apartments and plazas near and around KOP mall, we now going to have a massive commuter traffic polluting air, park and causing threat to secure living.
47	Website	Non-support		Warner	William	This project is misguided and should be rejected. I've commuted using SEPTA Regional Rail for nearly 10 years and as such have had opportunity to see first-hand the seriously deficient infrastructure and poor operating performance on a daily basis. Available funds should be prioritized to improving the existing system first, prior to breaking ground on any new lines. The only way this project would make any sense is if it was privately funded in its entirety.
48	Website	Non-support		White	Joey	The KOP Rail is a horrible idea. As a lifelong resident I don't see it being a positive impact for the community. It will just drive crime up and turn King of Prussia into a city, which no one who is a resident wants! Please consider the impact on residents and do not do this to us. No Rail!
49	Letter	Non-support		Wilson	Linda	As a resident of Upper Merion Township, I believe that the King of Prussia Rail will: increase crime to our city, bring commercial real estate values to an all-time low, create an eyesore in our community, disrupt quiet family neighborhoods, increase noise pollution, cause relocation of our 9/11 Memorial, cause possible damage to our Drinking water reservoir due to ground disturbances, cater to gamblers and shoppers and not the residents of our community, and destroy our suburbs and create a "city" environment. King of Prussia Rail is a destructive unnecessary infrastructure that is essentially being rammed down our throats. The residents of Upper Merion do not want this horrendous rail system destroying our homes, our community our lives. It is going to create a burden to those of us who live here and raise our families here. This is our family, our home, our community and we do not want or need this rail. I am completely opposed to this project and am disgusted that you have reached out to the workers of the mall to support this rail who are not even residents of our community. As a 45 year resident of Upper Merion I feel that this is backhanded and showing complete disregard for the real residents of our community. I reiterate, I am completely opposed to this project. We do not want to live like we are in a "City."
50	Website	Non-support		Zadroga	Michael	Once again another project trust the businesses want will get pushed through for the benefit of a few with no concerns for the many. There was once a passenger rail service that headed west to Reading PA. That was abandoned. With all the the development that continues in western Montco why isn't this service being addressed? Everyone speaks of the need for the KOP rail line at such an extreme cost to serve who, the residents of Upper Merion ; not hardly this project serves the owners of the KOP shopping districts . The residents of this township should have more weight being thrown at this than the business owners . If Septa and these owners want and need this project so desperately , let Septa and this group who need this fund this project and not be looking to public funding that everyone in this state should have to pay for it. Another debacle that must be done but can't be paid for just so these business owners can buy another mall or ruin another community.
51	Petition	Non-support	Bill Metzler (893)			...I would like to submit this copy of our (Change.org) petition to be placed into the FEIS against the proposed rail line into Upper Merion Township. It contains 893 signatures of people who are against the rail and most of whom live in the Upper Merion Township area. A copy will be also sent to the Upper Merion Township Board of Supervisors Chairman, State Representative Tim Briggs and State Senator Daylin Leach...

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Comment Number	Form	Topic	Organization/ Agency	Last	First	Comment
52	Petition	Non-support	Kathy Holtzinger (84)			It is our pleasure to send you the original Valley Forge Homes petition signed by 84 VFH residents stating we prefer to have the KOP Rail project built on the North Side of the PA Turnpike where the KOP Service Plaza is located. We do not want to have this light rail on the South side of the PA Turnpike, which would alter the backyards of 29 VFH properties tremendously. We realize this rail project is still in the planning phase, but we want to make it known to SEPTA and the Upper Merion Township Board of Supervisors just how the residents of Valley Forge Homes feel about this train possibly invading our neighborhood. Thank you.
53	Hearing	Non-support		Paciello	John	I am against this rail because they would like to take out either the 9/11 Memorial or the firehouse, and they currently do not have funding for this project...I disagree with the route. It's not going to help traffic, it's not going to improve anything. It's not good for the community because it will cause more traffic because people have to get around this thing driving different ways, and they will be doing road diets on First Avenue to shoehorn this thing in, and I don't agree with that. So, there's no stations near any residential homes, so it's not good for the local people of the township. It doesn't benefit King of Prussia one bit, it only benefits the people coming from outside, from the Philadelphia area into King of Prussia. So, it's one way. We're giving up, and people from outside the community are taking it....I feel like the politicians and SEPTA are pushing this down our throat, something we didn't ask for. If it was direct Regional Rail connecting the R5 Line to Norristown that would be a different story, where it can help people because people are not going to use the KOP Rail to connect to a SEPTA Regional Rail to go to Philadelphia. They would rather drive to a Regional Rail station at the very least, and use that. I don't see this as improving anything in here, it's just causing more gridlock and more problems. Plus, we have to bring in more police, and fire, and our fire department's volunteer, and you want to move the firehouse, that doesn't make sense...I've ridden the rail line that goes from Upper Darby to Norristown. And it gets worse as you get closer to Upper Darby. And the condition of the tracks and everything, it looks terrible. And I'm afraid that's what's going to happen to King of Prussia, it's not going to be maintained. Who's going to be maintaining the infrastructure? SEPTA can't upkeep the infrastructure that they currently have; it looks like garbage.
54	Hearing	Non-support		Philips	Thomas	I think it's a huge misuse of money. I can't picture that it does anything better than what we already have...What the spur will do is double the length of time between trains that ultimately reach King of Prussia. You can have a train leaving 69th Street every 10 minutes, and if you have one train going to King of Prussia, and the next one going to Norristown, and the third one going back to King of Prussia, and so on, the length of time between trains in King of Prussia is 20 minutes, just by definition...I don't think that the proposed train will get you there down to 69th Street any faster than the 99 (bus), plus the King Manor stop. In fact, I think that the 99 King Manor stop and High Speed Line will be faster because there's only 10 minutes between the bus and the train...With the High Speed Line you have a proposed bridge going over the bridge on 202. So, we have a bridge going over the Turnpike and then we got another bridge going over all of that. I think that's a horrendous piece of engineering. That means you haven't really thought things out because there's always a way around without having to stack bridges. And I see also that you're crossing the Turnpike twice, which I think also is a misuse of funds....The latest I've heard, now they expect \$500 million to come from the State of Pennsylvania. I have no idea in the world how they're going to get \$500 million out of Pennsylvania. That means that we just add another billion to the debt I guess and move on. And then there's been some promises made with this, in passing, that are impossible to meet. One of them was that the proposed train will get you to Philadelphia quicker than the 125 bus. Since you look at the schedule the 125 bus, in some cases, takes less than an hour to get there, and in the worst case it's 70 minutes...I know that during three o'clock to six o'clock in the afternoon the traffic is a little bit slower, but it's nowhere near where you can get there an hour faster than you can on the 125.
55	Hearing	Non-support; Alt		Metzler	William	I'd just like to go on record and say that while I am against this rail, I really feel that it would go a long way with the residents if we could see this rail over on the service plaza side of the Turnpike. It would really help the residents.

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Comment Number	Form	Topic	Organization/ Agency	Last	First	Comment
56	Hearing	Non-support; Alt		Hagopian	Samuel	I would like to express my vehement opposition to the King of Prussia Rail Project and urge SEPTA to choose the No Action Alternative for this project...I see no benefit of this rail line to our community. The \$1.2 billion price tag is a waste of funds, and the \$600 million that SEPTA needs to raise to complete this project would have better use improving traffic congestion not just in Upper Merion, but in eastern and central Montgomery County overall. The concern is this project could poison our drinking water will only make King of Prussia competitive with Flint, Michigan. The fact that the firehouse will have to be relocated with this project and no public safety impact study has been completed, let alone discussed, puts the entire community in grave danger. That being said, if SEPTA wishes to bring this boondoggle of a project upon themselves, the PA Turnpike North/South Option should be their LPA.
57	Hearing	Not project		Hartzell	Vernon	...When 422 was being built, it was designed or sold as a way to build a railroad up to Reading. What happened to that?...
58	Email	Not project		Hass	Patricia	I support having the light rail train line from Philadelphia International Airport to King of Prussia. This would be a great convenience to many people traveling to and from the airport. It would alleviate traffic on many of our major roads. Potential for job creation with this project is very high.
59		Not project		Martin	Sylvia	Can I get train to wellboro to the mountain
60	Website	Not project		Rockhill	Joanne	Sitting on 422 AGES ME and is so unfair to the residents of Montgomery and Chester Counties that we do not have access to public rail system, as residents do in Delaware and Philadelphia counties.
61	Website	Not project		Schweitzer	Joanna	I live in Reading PA and commute to Northern Liberties in Philadelphia. I drive hundreds of miles every week commuting and it is clear that a rail line is needed along route 422 due to TERRIBLE congestion. It's a dangerous road, and a rail line would ease traffic immensely.
62	Email	Not project		Styx	Staind	Please, could you stop the train horns from 10pm to 7am while traveling through Norristown? The past couple of years, the amount of horns and the frequency in which they're sounding has greatly increased. They wake us from sleeping several times and it's quite the disturbance. I understand these are used for safety reasons, but during this timeframe, it's waking us and I read that all that is required is a simple request to have this be considered a 'quiet zone'.
63	Website	Not project		Smith	Wendy	I wanted to give you some feedback about the proposed rail project. I live on Trooper Road and have to cross the 422 bridge every day for work. A 3 mile drive takes me on average 20- 30 minutes or longer. I work in an office building across the street from the new Town Center. 1) The new bridge is only going to have 4 lanes with room for expansion if needed WHY? What's up with that? Only 4 lanes? It is already proven that we need a minimum of 3 lanes from Royersford to KOP. 2) Traffic count I believe is 92,000 cars per day, the highest traffic count of any roadway in the area. 3) Build the rail from Royersford to KOP. This is where the majority of the workers are coming from. As enamored as everyone is with the city this is not where most of your workforce for the KOP area is coming from.
64	Email	Outreach		Alexaki	Caroline	Thanks for your email. Just to clarify, I did post on no kp rail about wed 11/8/17 meeting being the first time that I had heard of the POSSIBILITY OF THE FIREHOUSE AND memorial being moved. Is there another way for residents to be kept informed of possible changes to the rail proposals so that residents are not surprised? I also, posted the next public meeting date of 11/13/17 @ dbl tree hotel.
65	email	Outreach		Cowhey	Angela	I'm writing because I have concerns about this memo (attached) that is going around the King Of Prussia mall and it's stores. It looks like this memo is asking for store employees to send this sample letter to you so that KOP Bid and the rail coalition can get generic letters of support to add to their cause. My issue is that this sample letter clearly states "as a resident of Upper Merion Township"..... Can you comment on why sample letters that clearly state "as a resident" are being distributed to mall employees who do NOT live within King Of Prussia? I hope that you and your team are fact checking letters received to actually determine that they are from residents (especially if they use this sample suggested from the general manager of the mall, KOP BID, and the rail coalition).
66	Website	Outreach		Goodman	Randal	When will the handouts and the video be available from this round of meetings?
67	Form	Outreach		(no name given)		The woman at the front desk is nasty.
68	Email	Outreach		Rogers	Richard	When is the next open meeting for the public to attend in King of Prussia for Upper Merion twp. residents ? Thank You
69	Email	Outreach		Walsh	Sydney	I am wondering if there are any presentation materials or display boards from the public meeting on Nov. 15? I found the handout for the scheduled meetings (http://www.kingofprussiarail.com/docs/KOP_Mtg%20Announcement_10.10.17.pdf), but not the presentations.

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70	Email	Questions		Bullock	Colleen	I do have one kind of important question: where do you expect to obtain your funding? As of right now, I have heard zero evidence that you have full funding for either the project or long term maintenance expenses, yet you continue to say that Upper Merion will not pay a cent. Where is the logic in that? In addition, I have read all of the available documents and it still seems like you are not giving all of the necessary information, despite the progressed state of your initiative.
71	Email	Questions		Budzien	Bud	A map of the proposed line might be of help.
72	Website	Questions		Cahill	James	In the DEIS you use the term LPA with no definition for the acronym. what does it mean?
73	Email	Questions		Gilbert	Bruce	I just watched a show on Japan's monorails. Has a monorail been considered for this line? I believe it would generate public excitement in the project and result in increased usage by riders.
74	Website	Questions		Goodman	Randal	I am receiving conflicting information. I understand that an alternative has been presented that will eliminate the track from going through the Valley Forge Homes property. I have heard that: 1) Only the 9/11 memorial would need to be moved. 2) The Firehouse and the 9/11 Memorial would have to be moved. Which is what has been proposed?
75	Email	Questions		Howsare	Christine	The DEIS cites a report entitled Operating and Maintenance Cost Model Results, LTK 2016, available on www.kingofprussiarail.com . I cannot locate the referenced report. It is not listed within the DEIS or its appendices, among the DEIS Technical Memoranda, DEIS "other reports", nor is it on the "documents" page from the general website. Can you please point me to this document. Thank you.
76	Email	Questions		Krott	Dan	I live in KOP in Belmont Terrace and the noise from the existing trains is getting ridiculous. I guess they are freight trains running through Bridgeport. They blow their whistles and horns at all hours of the day and night. How often will the trains on the new rail extension be blowing their horns and whistles?
77	Email	Questions		McCann	Kevin	Just curious, what is the location of the proposed station, and which stops would there be after Radnor?
78	Website	Questions		Napolitan	Mike	My concern with the Local Preferred Alternative and the lack of information regarding our drinking water protection is that it cross within a few hundred feet of our drinking water reservoir on Saulin Blvd and within a few hundred feet of contamination from the Henderson Road Superfund Site. Contamination from the Henderson Road Site was observed in the reservoir in the 1970s and was listed in the Superfund in 1985 and has been undergoing remediation to prevent further contamination of our drinking water. With new ground disturbance including the possibility of new sinkholes from that construction, I am worried that the conditions could change to the hydrogeology that would impact our water. Therefore, we need to ensure SEPTA thoroughly investigates the impacts on the groundwater recharge, contaminant transport, and flow around the reservoir and coming from the Henderson Road Superfund Site.
79	Website	Questions		Peters	Wesley	Why is there no station stop at valley forge? /Royersford/Pottstown have been expanding and having stops there would give access to people looking to get to places farther from Philadelphiha
80	Website	Questions		Renzi	Mike	I have some concerns about the "PA Turnpike North/South Design Option crossing over U.S. 202" as I travel to/from Philadelphia on a weekly basis. 1. How will this design, if implemented, affect rush hour traffic conditions on the west bound Turnpike and both the north and south bound U.S.202 highways ? 2. What is your time estimate for the construction to completion of this design option ? I would appreciate an email response as I am unable to attend any of the scheduled meetings on Nov 13th or 15th.
81	Email	Questions		Rogers	Richard	The township supervisor at last years meeting indicated he was researching the possibility of putting the railine extension on the ballot or referendum for Upper Merion residents to vote on. Two elections and primary have passed with no question on the ballot. What were his findings and when can Upper Merion residents see the question on the ballot , next primary?
82	Website	Questions		Schupak	Hedda	Two points: 1) Building any kind of rail service without connecting it to the Village At Valley Forge is silly. That's where a lot of residents who are likely to want transit live. 2) While I'm in favor of adding rail service to King of Prussia, few residents want a trolley to 69th St., whereas we would love to have the Norristown R6 Regional Rail Line extended to go from KOP into Center City. Why has this not been a viable alternative? There are already existing tracks (some unused) in multiple places, and enough land to add two tracks for a passenger train. And why can't Regional Rail tracks go the same place as the trolley tracks? Surely they're not that much bigger! That would benefit both businesses and residents because it would be a one-seat ride instead of a two-seat ride.
83	Email	Questions		rnayg		Is there a train from king of prussia to denville tran station denville nj and how much ?
84	Email	Questions		Herron	Michelle	Could you please tell me what the preferred alternative is?

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Comment Number	Form	Topic	Organization/ Agency	Last	First	Comment
85	Website	Support Alt		Hope	Jacob	Please choose the 202 alignment! It will get more riders! The current alignment chosen will get less riders, and less riders per \$.
86	Website	Support Alt		McCaffrey	Andrew	The 202-North Gulph Alternative is the best choice for the rail route. Of all the routes, it maximizes service both to the traveling public and to businesses. The routes following the PECO line have built-in disincentives for passengers, bypassing the businesses and high-density residential high-rises on 202. And any route not serving the Village at VF makes the project questionable, given the development and popularity of that site. Also, an end point at 1st Avenue will serve so few as to be economically unfeasible. For these general reasons, the 202-North Gulph Alternative is clearly the best use of public money in achieving the stated goals of this project.
87	Hearing	Support Alt	Board of Commissioners , Montgomery County, PA	Arkoosh, MD, MPH	Valerie	I am the Chair of the Montgomery Board of Commissioners, and I would like to offer my unwavering support for the King of Prussia Rail Project and to comment on SEPTA's Draft Environmental Impact Statement, including the Locally Preferred Alternative and the two design options. The workhorse of our county economy is King of Prussia, an edge city located in Upper Merion Township with its 28,000 residents, 60,000 jobs, 4,000 companies, and major tourist destinations. SEPTA's proposed extension of the Norristown High Speed Line to King of Prussia gives us the chance to knit the region together like never before and to position Montgomery County for the economy of the 21st Century. It will also revolutionize the communities along the existing route. For residents in Upper Merion, they can be easily connected to our first-class medical centers in Center City and also to Norristown where we have growing and thriving restaurant and theater oppostrtunities...I am also a physician, and I relaize so clearly that this isproject is equally about public health as it is about transportation and economic developmnt. This Draft EIS is also the culmination of hundreds of hours of public input. SEPTA went above and beyond to be transparent and to listen to the community. They held not one but thee well-publicized open houses every step in the alternatives analysis process. They met regularly with committees of Upper Merion citizens, including one made up of residents most impacted by the project...The PA Turnpike North/South Option is proof that SEPTA is addressing the concerns of the neighbors.
88	Website	Support Alt		Barkley, PE	Richard	I am very much in favor of SEPTA pursuing a route expansion of the R-100 that will include stops at the Valley Forge Center and the King of Prussia Mall. This area has long needed additional mass transit options, and this appears to be one of the most logical. I strongly urge SEPTA to move ahead with this project along the route that is shown the most cost effective to build. I regularly use the R-100, and would love to use it more.
89	Email	Support Alt		Basler	Chris	I support the KOP Rail Locally Preferred Alternative as outlined in the DEIS. When constructed, the NHSL extension will provide a more efficient public transportation option for residents, employees, and visitors to King of Prussia. The KOP Rail will increase access to jobs, cultural amenities and educational institutions without exponentially increasing congestion on area roadways. Also, the proposed LPA creates development opportunities in areas of KOP that can handle growth in commercial and residential properties through sustainable practices and infrastructure improvements while reducing negative impacts to established KOP residential neighborhoods. I look forward to this regional public transportation project moving forward.

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Comment Number	Form	Topic	Organization/ Agency	Last	First	Comment
90	Hearing	Support Alt		Bickel	Richard	I'm here tonight to present the position statement of PennTrans. I am a board member of PennTrans, and they have authorized this position statement...PennTrans strongly supports the timely completion of the Draft Environmental Impact Statement and the advancement of the King of Prussia Rail project toward implementation consistent with the recommended Locally Preferred Alternative. Our rationale is similar to the handout SEPTA prepared that lists the benefits of the project. The proposed King of Prussia Rail project will enhance access to both Upper Merion and Norristown for workers and residents; facilitate intermodal connections to shopping, jobs and residential areas; provide improved commuting times between King of Prussia and Philadelphia; and generate new economic development activity with increased market values and tax revenues. Additional benefits include helping to reduce traffic congestion, improve air quality, supporting more compact development patterns, and strengthening overall quality of life for the area. SEPTA and the consultant team have been diligent in listening to local community and neighborhood issues and concerns, resulting in corridor realignments with related mitigation efforts. These modifications have been incorporated into the Locally Preferred Alternative. We hope this approach will continue as the project advances, with careful consideration of local residents and the possible need for additional mitigation activities.
91	Hearing	Support Alt	10,000 Friends of Pennsylvania	Boyce	Caroline	We strongly support the construction and timely completion of the King of Prussia Rail Extension. This inclusive, multi-modal transportation vision will help transform the King of Prussia area from a modern eccentric community to a healthy transit-oriented development community with a host of valuable benefits for the whole region. It will directly connect the three most important job centers in Philadelphia: King of Prussia, University City, and Center City. The proposed rail extension will provide mobility options for residents and visitors alike. Key benefits will include improved reliability over bus service, reduce commute times, reduce traffic congestion...reduced emissions and cleaner air. It will also better accommodate the needs and preferences of seniors, persons with disabilities, and young people and millennials. It will mean increased access to valuable destinations including medical centers, educational institutions, shopping, dining, entertainment venues, and places of work. Numerous studies establish that commercial property values, the local tax base, as well as private home values and marketability, will be improved and increased by the rail line extension. The rail extension investment will also act as a multiplier, generating economic activity. Studies show that investments in public transit generate almost four times the cost of an economic activity benefit. 10,000 Friends supports the recommended Locally Preferred Alternative with the options. This route has incorporated realignments and related mitigation efforts to date, provides all the benefits identified previously, addresses neighborhood issues and concerns, and mitigates against further environmental impacts. We urge incorporation of additional design and infrastructure improvements in communities along the rail extension corridor to address impacts and capitalize on opportunities to improve quality of life for all residents. These include things such as sidewalks, street lighting, bicycle lanes and walking trails, transit stop and station improvements, as every rider is, for the most part of their trip, a pedestrian.

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Comment Number	Form	Topic	Organization/ Agency	Last	First	Comment
92	Email	Support Alt		Cowhey	Angela	I am not a business owner, I am not a CEO, and you could say I have made zero impact on King of Prussia. But I am a mother, a concerned resident, and my husband developed the No Kop Rail social media campaign. And you have to admit - it has gained a lot of attention. Probably more than septa or the Kop bid ever thought it could. And don't be confused - we are not anti-rail. My husband and I love King of Prussia and have no plans to leave it. But the idea that a rail is going to come barreling through our neighborhood is scary. The idea that the representatives in office in King Of Prussia support this is scary. It seems that corporate matters more than humans. And that they believe funds should go towards giant metal structures rather than residents in need...I am against the idea of uprooting residents from their homes. I am against the lack of answers we receive from septa and the Upper Merion supervisors regarding safety, sinkholes, taxes, and properties. I believe that the possible pros of this project do not outweigh the cons. I believe that septa should focus on their current rails, their current buses, and fix those problems first. I believe that septa and kop bid have not been truthful in public presentations and have withheld important information regarding the locally preferred route. And I hope that they continue to look into the option of the new alternative - the more expensive one that won't affect any residents homes. Because while yes, the cost will be more, the negative impact on residents will be less and THAT is what matters in the end. So my stance remains - I am against the locally preferred route for the Kop Rail project and would prefer that septa plan to use the new alternative (the one that will NOT affect residents homes).
93	Website	Support Alt		Frantz	Josh	If the intent is commuter rail, then any alternative needs to include running the line through First Ave and/or Moore Rd. You're not going to get people to walk in the heat/cold/rain. That being said, the real need for commuter rail involves the 422 corridor, 222 to KOP & a parallel to 276 as Turnpike volume across Montco/Bucks is heavy with no "ring" of rail. (all spokes to city) I commute to KOP daily from Horsham and would have zero use for any of the proposed options for work or pleasure.
94	Hearing	Support Alt		Grossman	George	I live and work nearby and I find myself in King of Prussia on almost a daily basis. I'm here to express my support for the King of Prussia Rail project. I know the importance of King of Prussia as an important transportation and commerce hub for the Philadelphia region. In my opinion, adding SEPTA rail service to King of Prussia will help both King of Prussia and our region to remain and become even more economically competitive than it is today. At the same time, overall quality of life will be enhanced by reducing traffic congestion, and providing individuals with another means of mobility throughout the region. In my opinion, the rail service has great promise for current and future residents. Increased transit options increase overall property values and desirability of place, It will also provide better connections to our region's fine educational and cultural institutions and other job centers. Although almost any significant investment and a new public infrastructure project will have some impacts to nearby properties, it appears that the current route, designated as the Locally Preferred Option, provides a careful balance between the public interest, while mitigating impacts to nearby properties.
95	Letter	Support Alt	Planning Department, Delaware County, PA	Hill	Linda	...While the facilities would be located within Montgomery County, benefits would extend to Delaware County residents who work or shop in the King of Prussia area...The (Delaware County) Planning Department supports the Locally Preferred Alternative (LPA) routing. The Draft EIS estimates that the LPA would save transit riders 217,000 hours per year and drivers who switch to the project would save a million hours per year. The LPA would reduce automobile trips by 6,342 per day. It would also have the highest average weekday ridership, the most auto-based trips shifted to transit by 2040, and provide access to the most jobs within a 1/2 mile of proposed stations. The King of Prussia rail extension will provide residents of Upper Darby, Haverford, and Radnor Townships who live near an existing NHSL station a one-seat ride to King of Prussia, with considerable time savings...It will also reduce traffic, improve air quality and reduce pollutants, provide savings on gas and maintenance of vehicles, and address the growing mobility needs of seniors, and people with disabilities.

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Comment Number	Form	Topic	Organization/ Agency	Last	First	Comment
96	Hearing	Support Alt		Holton, AICP	Jody	The Commission offers the following comments to support the study process and the recommended Locally Preferred Alternative with the North/South design option. The purpose and need for the project is consistent with the county's comprehensive plan and also our region's long-range plan for transportation. Both of these plans identify the project as a major component of the region's future transportation system to meet existing transportation needs and guide future growth and development. The No Action Alternative is an unacceptable plan for the region and provides no reasonable alternative to the worsening congestion on the Schuylkill Expressway. It also stymies future growth and redevelopment efforts in King of Prussia and Norristown...The recommended Locally Preferred Alternative with the North/South design option directly responds to and resolves community concerns about the proximity of the alignment to backyards along the south side of the Turnpike. This alignment choice is the best choice; it has a low number of potential property impacts and the least potential noise impacts. It also has the highest average weekday ridership, the most auto-based trips shifted to transit by 2040, and provides access to the most jobs within a half mile of the proposed stations.
97	Email	Support Alt		Kirse	Eric	I received a postcard in the mail today and didn't realize this project has been going on forever. I think it is a fantastic idea, and I have been telling everyone for years we need rail extended to KOP. One thing I'd like to suggest is that having lived + worked here for 10 years, I think: PECO/TP-N. Gulph is the best plan -- http://kingofprussiarail.com/docs/Build_Alternatives_5_lines_FINAL%20copy_PECO-TP-N_Gulph_Map%20Only.png . The current LPA basically avoids a large chunk of the business heart of KOP -- easy access to the movie theaters, Lockheed Martin, the Village/Wegmans business area (etc), which has all been aggressively expanding and developing over the past few years. I've driven those roadways thousands of times over the years and am intimately familiar with traffic patterns, and where the TP-N.Gulph runs is basically perfectly aligned to enable people to make a short walk to their many destination options. I'm sure this project is full of detractors/supporters/stakeholders on all sides, but please add my +1 for the TP-N. Gulph line as the current LPA configuration would poorly serve an area that is currently growing at a rapid pace in KOP.
98	Hearing	Support Alt	Planning Commission, Montgomery County, PA	Kline	Steve	The Montgomery County Planning Commission enthusiastically supports the extension of SEPTA's Norristown High Speed Line to King of Prussia...The MCPC supports the Locally Preferred Alternative identified in the King of Prussia Rail Project Draft Environmental Impact Statement because it meets the project purpose and need and achieves the goal of county and regional comprehensive plan...This project is integral to the goal of the County transportation network that serves all people and supports land use and economic development efforts...
99	Email	Support Alt		Kobialka	Elaine	My first preference is NO to the KOP Rail. 2nd choice is North/South Design Option. I have many concerns which I have filled out in previous comments. Sound, visual detracting from our homes, impact of construction and future vibration on the integrity of the dwellings in our neighborhood. The Rail Project benefits the business entities in KOP not the residents. The true cost of this project will eventually come out of the residents pockets (additional policing/fire/crime). Not anti-rail - bring it across the river.
100	Website	Support Alt		Kriner	Mark	I feel the two routes that follow 202 would be better for the businesses between Norristown and the mall. I believe any route that bypasses these businesses will have a negative economic impact on them.
101	Hearing	Support Alt		Laurie	Howard	The deficiency in the proposed plan is that it does not serve the Village in King of Prussia, which is expanding in residential and commercial activity. That deficiency could easily be resolved, in my opinion, by not having the line terminate in the vicinity of the casino, but instead by making a left turn at Gulph Road and extend all the way down to the building.

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Comment Number	Form	Topic	Organization/ Agency	Last	First	Comment
102	Hearing	Support Alt	Board of Commissioners , Montgomery County, PA	Lawrence, Jr.	Kenneth	I want to offer my full support for the King of Prussia Rail Project...SEPTA's proposed extension of the Norristown High Speed Line to King of Prussia is the most logical and efficient way to connect suburban Philadelphia's largest employment center to the city's two largest employment centers of Center City and University City. This project utilizes the existing Norristown High Speed line with its high speed frequent service and makes a relatively short extension for this new service. The Locally Preferred Alternative that the Draft EIS recommends is the best out of all of the options; it is the most direct and attracts the second highest number of riders, it is the lowest cost, it affects the fewest homeowners and businesses, it minimizes visual impacts, it serves the business park with two stops and facilitates redevelopment in those areas. Out of all the potential routes, this one is the strongest alignment, especially with the two design options: the North/South Turnpike and 9/11 Memorial Avoidance Options. We know from the Draft EIS that the KOP Rail Project will significantly reduce the weekday commute. Driving from the King of Prussia Mall to City Hall regularly takes almost 70 minutes, while the same trip on an express KOP Rail train will take less than 40 minutes. That's a 30-minute savings, and it is dependable, on-time service that is available almost around the clock. Commuters and residents from our county seat of Norristown and its neighbor, Bridgeport, currently have to endure a 38-minute bus ride to go four and a half miles to the King of Prussia Mall and even longer to the business park. KOP Rail will cut that down to 15 minutes. The Philadelphia region finally has a transit project that offers a viable alternative to driving on the Schuylkill Expressway. We must move this forward.
103	Hearing	Support Alt		Levering	Emma	...I really want to urge SEPTA to look at making the line be on the service plaza side of the Turnpike. It seems that this project is going to be the most benefit to business and that is the side of the Turnpike where the businesses are. If it comes on the south side, it's going to impinge on many residential properties. I really do not want to see that happen.
104	Form	Support Alt		Smith	James	I am in favor of the revised plan to relocate the rail system to the north side of the PA Turnpike. Less disruptive to all homeowners even though there is an additional cost.
105	Resolution	Support Alt	Planning Commission, Montgomery County, PA			...Now therefore, be it resolved, that the Montgomery County Planning Commission Board hereby supports and endorses the KOPRail project and its Locally Preferred Alternative as proposed in the Draft Environmental Impact Statement; and be it further resolved, that the Montgomery County Planning Commission strongly recommends that the Federal Transit Administration adopt the findings of the Draft Environmental Impact Statement, select the Locally Preferred Alternative and grant SEPTA the authority to begin working on the Final Environmental Impact Statement...
106	Hearing	Support Alt		Maits	Scott	I am a rail transit advocate design expert...First off, this should be done as soon as possible. This is the line to do. But it is a major, major investment and needs to be really well thought out...There are some other needs besides going to 69th Street and to West Philadelphia, that's a one-seat ride in Philadelphia, and we know how to do this. If this is done, but with a slightly heavier infrastructure, you will be able to someday also share the Norristown-oriented cars with regional rail. It's not legal currently, but there were plans to do that...It's something absolutely necessary, and not just to go to Philadelphia but to also go out to Exton, and to Great Valley...to come from Reading and to come in. But you have to also realign the preferred alternative to be either along the PECO right-of-way or perhaps along 202, which is more expensive but it's not at houses or even in backyards, and then follow Gulph Road up and over 202, shared with the bikeway, at least to get through there from the Chester Valley Trail. and then follow Gulph Road all the way to the casino. This would be a six-stop ride and would be useful by the thru trains to the Great Valley from Norristown and the Norristown train line.
107	Letter	Support Gen		Hiser	Megan	Having the SEPTA line run from Philadelphia to King of Prussia would be the best thing for this city. I have been struggling to work in the mall and drive 1.5 hours to work every morning, especially with the holiday coming up. It would not only reduce the amount of cars being on the road, but reduce the amount of emission they are giving off. I would love to endorse the King of Prussia Rail! I would say 8/10 mall employees live in downtown Philadelphia and would really be a huge help to them for commutes...
108	Letter	Support Gen		Spellman	Chantel	I am writing to enthusiastically endorse King of Prussia Rail...The King of Prussia Rail is a vital infrastructure project that cannot be ignored. The Philadelphia region needs to invest in this project to help reduce the burden of highway congestion that is choking our ability to grow jobs and encourage economic development.

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109	Hearing	Support Gen		Achtert	Alfred	...I would urge you to combine the (Turnpike-Gulph Road alternative) with the approved or nearly approved LPA and make a loop from the mall up around by First and Gulph Road (station) and then back down to the mall, and then come back. Double-track and run cars around it. That would give you better options for serving some of the areas...Also, I see six cars are to be added, and not to be totally compliant with the existing fleet, and I'd like you to check very carefully to see that you have enough spares...
110	Website	Support Gen	The Philadelphia Ready for 100 Team	Agrawal	Pratima	I am in full support of the KOP rail extension and would encourage SEPTA to approve plans to add this much needed line. We cannot ignore the impact that hundreds of fossil-fuel vehicles have on our environment. Providing a clean energy transportation option for those commuters would be a win for the environment, a win for SEPTA, and a win for commuters who would no longer have to endure daily traffic congestion (with the high risk of accidents) and would have a more cost effective way into the city. It would also be a win for the city of Philadelphia by providing safe and easy access to the city's many businesses and leisure activities, thereby helping its economy. It also benefits local residents in the vicinity of a KOP rail station by increasing property values and providing them with easy access to the city as well. Everyone affected by a KOP rail extension, including the environment, is set to benefit from it. There are no reasons to deny moving forward with this plan and I truly hope SEPTA sees this as an opportunity to make the greater Philadelphia area a better place.
111	Letter	Support Gen	The Philadelphia Ready for 100 Team	Agrawal	Pratima	As champions of clean energy living, the Philadelphia Ready for 100 team is enthusiastically in support of KOP Rail. Among the many benefits of this proposed project are reduction in air pollution and increased access to clean energy transportation for people with varying needs and mobilities. We endorse this project to help move the city towards 100% clean energy and a more sustainable future.
112	Letter	Support Gen		Ahmed	Shakil	I am writing to enthusiastically endorse King of Prussia Rail...The King of Prussia Rail is a vital infrastructure project that cannot be ignored. The Philadelphia region needs to invest in this project to help reduce the burden of highway congestion that is choking our ability to grow jobs and encourage economic development.
113	Hearing	Support Gen	Clean Air Council	Alloway	Kamali	The Clean Air Council strongly supports (the) King of Prussia Rail Extension of the Norristown High Speed Line...This project will improve air quality and public health for all of the residents in the greater Philadelphia region...The transportation sector is one of the largest contributors to US greenhouse gas emissions and pollutants, making it difficult for the region to maintain the federal health standards for ozone and particulates...The Schuylkill Expressway, which serves as the main access point to King of Prussia, is the ninth most congested roadway in the country. Vehicle emissions from Expressway traffic greatly affect air quality...Every rider served by King of Prussia Rail will be one less car on the road, improving air quality and traffic congestion for everyone.
114	Website	Support Gen		(no name given)	Amanda	I commute from South Philadelphia to King of Prussia every day. For months, I took the Norristown train to the transportation center. Because the train didn't take me all the way to work, I had to buy a car to keep at the transportation center overnight to drive the extra two miles to work every day. The KOP rail would take me to a point that is at least walkable and I wouldn't need the car. Additionally, the bus ride to/from KOP is absolutely miserable during rush hour. Often, people have to stand for the entire duration of the ride, which could be more than 2 hours in traffic. And that's if the bus doesn't pass you with a "take the next bus" message, in which case you're stuck waiting for an hour or more at the stop. Another alternative is taking the 99>NHS>MFL>BSL>whatever connecting bus or walking, which is a ridiculous amount of transfers. This proposed line would make life and commutes so much easier for thousands of people (KOP and Philly residents) who live, work or spend time in Philadelphia.
115	Email	Support Gen		Ammon	Rachel	I am writing today to voice my support for the proposed King of Prussia Rail Project. As an employee who works in King of Prussia and battles the traffic five days a week, I see great value in adding alternative modes of transportation. This is truly an exciting time for our region, and I hope that we can all work together to make this a reality.

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116	Email	Support Gen		Anderson	Rob	...I am writing to enthusiastically endorse King of Prussia Rail. Among its many benefits...King of Prussia Rail is a vital infrastructure project that cannot be ignored. The Philadelphia region NEEDS to invest in this type of multi-modal transportation project to help reduce the burden of highway congestion and provide better access to job opportunities, cultural amenities and more for my neighbors and others in our region. I endorse this project and encourage others to join me!
117	Letter	Support Gen		Angel	Alicia	I am writing to enthusiastically endorse King of Prussia Rail...The King of Prussia Rail is a vital infrastructure project that cannot be ignored. The Philadelphia region needs to invest in this project to help reduce the burden of highway congestion that is choking our ability to grow jobs and encourage economic development.
118	Hearing	Support Gen		Ankers	James	I am in favor of the project, although I respect and appreciate the concerns of the residents who are opposed...My teenage son has a learning disability that is not severe enough for him to never have a job, but severe enough that he may never be able to safely operate a car. Having a nearby rail option could end up being the thing that opens up more employment opportunities for him outside the township. Following the development of the most balanced plan, every effort should be made to complete the project while working to minimize the negative impact on homes closest to the line.
119	Form	Support Gen		Atkins	Robby	I am able to write this comment because I have another 40 minutes until my next bus to 69th Street. When I finally reach 69th Street, I must then take the Route 113 to get home. It was 5:30 pm I left work, 8:30pm I unlocked my front door. A new line that transports every 20 minutes would greatly decrease that time frame.
120	Email	Support Gen		Ballar	Cherry	...I support KOP Rail! As a person is employed at a business in the King of Prussia region, I am writing to enthusiastically endorse King of Prussia Rail...King of Prussia Rail is a vital infrastructure project that can't be ignored. The Philadelphia region NEEDS to invest in this project to help reduce the burden of highway congestion that is choking our ability to grow jobs and encourage economic development. I endorse this project and encourage others to join me!
121	Letter	Support Gen		Banks	Felicia	I am writing to enthusiastically endorse King of Prussia Rail...The King of Prussia Rail is a vital infrastructure project that cannot be ignored. The Philadelphia region needs to invest in this project to help reduce the burden of highway congestion that is choking our ability to grow jobs and encourage economic development.
122	Letter	Support Gen		Barksdale	Shauna	I am writing to enthusiastically endorse King of Prussia Rail...The King of Prussia Rail is a vital infrastructure project that cannot be ignored. The Philadelphia region needs to invest in this project to help reduce the burden of highway congestion that is choking our ability to grow jobs and encourage economic development.
123	Email	Support Gen		Barley	Melissa	I am in favor of the King of Prussia Rail. Linking King of Prussia to region will provide a major benefit to the economy of not only King of Prussia, but its neighbors Bridgetown, and Norristown which are in need of an economic boost. Infrastructure for accessible communities creates healthy communities.
124	Hearing	Support Gen		Barrett	Cameron	We (CSL) have been operating out of King of Prussia since 2004...At this moment we're going through a very rapid growth phase within our organization, and so we're further looking at expanding our presence here in King of Prussia. We want to stay here. We have many relationships in the area. Right on top of the list is CHOP, Temple University, and others within this locations...We have a diverse range of jobs that we offer at this site, and are growing....During the process of implementing a growth plan for this area, we (think it's desirable) for us to have a rail that's going to support continued attractiveness at this location for our staff.
125	Email	Support Gen		Bates	Jeanine	...I support KOP Rail! As a person is employed at a business in the King of Prussia region, I am writing to enthusiastically endorse King of Prussia Rail...King of Prussia Rail is a vital infrastructure project that can't be ignored. The Philadelphia region NEEDS to invest in this project to help reduce the burden of highway congestion that is choking our ability to grow jobs and encourage economic development. I endorse this project and encourage others to join me!
126	Form	Support Gen		Benn	Cherie	Just to ease the traffic & headache of traveling from Philadelphia to KOP to work. This is a brilliant idea & should be considered ASAP.

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Comment Number	Form	Topic	Organization/ Agency	Last	First	Comment
127	Form	Support Gen		Bey	Abu	This is a long overdue project. It will bring more people to the area thus more business would be done. This is a no-brainer.
128	Letter	Support Gen		Bharat	Magghea	I am writing to enthusiastically endorse King of Prussia Rail...The King of Prussia Rail is a vital infrastructure project that cannot be ignored. The Philadelphia region needs to invest in this project to help reduce the burden of highway congestion that is choking our ability to grow jobs and encourage economic development.
129	Letter	Support Gen		Blakey	Lakisha	I am writing to enthusiastically endorse King of Prussia Rail...The King of Prussia Rail is a vital infrastructure project that cannot be ignored. The Philadelphia region needs to invest in this project to help reduce the burden of highway congestion that is choking our ability to grow jobs and encourage economic development.
130	Hearing	Support Gen	Valley Forge Tourism & Convention Board	Bowman	Mike	We at Valley Forge Tourism and Convention Board enthusiastically endorse the SEPTA rail line. From a tourism standpoint, the project creates thousands of jobs and bolsters the economy. The project will promote and strengthen regional growth and economic development of the largest commercial center in the suburban Philadelphia region for employees, visitors, and still growing and expanding, especially the King of Prussia Town Center. The landmarks like the Valley Forge Historic Park, King of Prussia Mall attract more than 22 million tourists a year and shoppers. That's an average of 130,000 people in the area every day. There's a need for an efficient transportation system to ease some of the traffic and delays. The SEPTA rail line is important because it will only encourage more visitors to King of Prussia, Valley Forge and Montgomery region with reliable transportation in other ways. The project will have an incredibly positive impact on Montgomery County's 1,600 restaurants, 75 hotels, family attractions, and more than 200 arts and culture venues; not to mention, SEPTA's KOP Rail will offer easier access to the medical and educational institutions as well as students and faculty traveling amongst our 10 universities and colleges right along the Norristown Rail Line. More transit connections also increase property values adjacent to the line and create opportunities for new office, housing projects, and retail.
131	Letter	Support Gen		Branch	Sherri	I am writing to enthusiastically endorse King of Prussia Rail...The King of Prussia Rail is a vital infrastructure project that cannot be ignored. The Philadelphia region needs to invest in this project to help reduce the burden of highway congestion that is choking our ability to grow jobs and encourage economic development.
132	Website	Support Gen		Broadhurst	Ted	As a current commuter who works in KOP, I take the MFL to the NHSL to my car at dekalb street to my office everyday. While convoluted, this is actually faster than driving on 76. This rail extension would be a godsend for both my commute and businesses in the area. Critics who insist that they want KOP to remain a small town clearly haven't complained about the billions of dollars flowing into developments in the township like the KOP town center. The idea that it would be easier to get from KOP to downtown by rail would be incredible, that being said, its key that the extension be able to integrate with an expansion of the regional rail network to phoenixville / reading, whenever that happens.
133	Hearing	Support Alt	Montgomery County Transportation Authority, PA	Brown	Scott	Last week, the Montgomery County Transportation Authority approved a resolution supporting the KOP Rail Project...It is obvious to all of us that connecting Upper Merion, the largest employment center in the Philadelphia suburbs, and the third largest employment center in the region, to Center City and University City, is an obvious choice...The alignment proposed in the Draft EIS, from the Locally Preferred Alternative, is clearly the best option...It goes directly to places that most people want to go. It also serves a large business park with major national companies that the Upper Merion Township supervisors recently voted up some for more density and diverse uses. It affects the fewest number of homes and businesses, and has the least amount of visible impact on the community. Fundamentally, this project will improve the economy of the region, improve our quality of life for our residents, reduce existing congestion in the area, reduce travel times for commuters, reduce community cost, will have a huge environmental impact: fewer cars, less carbon footprint, which transcends all boundaries, enhances real estate values in the region, provides travel options for seniors, people with disabilities, and people without cars, and bicycle users.

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134	Website	Support Gen		Callahan	Rachel	I ride the NHSL every day as a commuter and I would LOVE to be able to ride it out to the King of Prussia Mall and other commercial areas. It's a great ride already and very easy to use. This is a good thing for SEPTA and for our area.
135	Form	Support Gen		Campbell	Jody Ann	I think that this project would be very beneficial to the Norristown community and other surrounding communities. I am 18 years old and I frequent the KOP Mall often. I know that my friends work there as well. Currently the bus ride is typically one hour not counting traffic and bad weather conditions. Sometimes I would take the rail to Gulph Mills and then have to take the bus, which is often packed with nowhere to sit. Having transportation directly from Norristown to KOP in less than 30 minutes is a big bonus and I guarantee it would be used often.
136	Website	Support Gen		Campbell	Lynne	I support the construction of the extension of the high speed line to the K of P mall. The buses in k of p are too crowded. I would definitely use the high speed line to go the mall. It makes so much sense environmentally. The rte. 100 runs through our backyard. It is very quiet and I forget it's there. Hopefully construction on this project will begin asap!
137	Letter	Support Gen		Chavarria	Paolo	I am writing to enthusiastically endorse King of Prussia Rail...The King of Prussia Rail is a vital infrastructure project that cannot be ignored. The Philadelphia region needs to invest in this project to help reduce the burden of highway congestion that is choking our ability to grow jobs and encourage economic development.
138	Email	Support Gen		Choi	Jim	...I support KOP Rail! As a person is employed at a business in the King of Prussia region, I am writing to enthusiastically endorse King of Prussia Rail...King of Prussia Rail is a vital infrastructure project that can't be ignored. The Philadelphia region NEEDS to invest in this project to help reduce the burden of highway congestion that is choking our ability to grow jobs and encourage economic development. I endorse this project and encourage others to join me!
139	Letter	Support Gen		Cirafesi	paula	...I am writing to enthusiastically endorse King of Prussia Rail...King of Prussia Rail is a vital infrastructure project that cannot be ignored. The Philadelphia region needs to invest in this type of multi-modal transportation project to help reduce the burden of highway congestion and provide better access to job opportunities, cultural amenities and more for my neighbors and others in the region.
140	Letter	Support Gen		Coley	Bruce	I am writing to enthusiastically endorse King of Prussia Rail...The King of Prussia Rail is a vital infrastructure project that cannot be ignored. The Philadelphia region needs to invest in this project to help reduce the burden of highway congestion that is choking our ability to grow jobs and encourage economic development.
141	Email	Support Gen		Conlin	Bill	...(Conlin's Digital Print and Copy has) been in King of Prussia since we began in 1980. We need the King of Prussia rail for the safety and convenience of our 53 employees. I vote yes!
142	Website	Support Gen		Cupo	Patrick	I implore the board to fully invest in this future KOP line to meet the increasing demand for public transportation from the KOP area. My wife currently drives to work as a nurse because the current SEPTA schedule is poorly timed and does not accomodate her needs to arrive on time and leave at an appropriate time. I am interested in activism and would be happy to learn more about the going-ons of this endeavor. I will be at the meeting Monday November 13th in support of the KOP rail.
143	Letter	Support Gen		Curry	Nasir	I am writing to enthusiastically endorse King of Prussia Rail...The King of Prussia Rail is a vital infrastructure project that cannot be ignored. The Philadelphia region needs to invest in this project to help reduce the burden of highway congestion that is choking our ability to grow jobs and encourage economic development.
144	Website	Support Gen		Custer	Kevin	By all means, we need More mass transit in this country, not less. Why does America have so much trouble embracing what has become so successful in Europe and everywhere else But here? We must get rid of this uniquely American mindset of 'one car, one person' driving to work and Everywhere else. YES, we need More rail transportation, especially TO the King of Prussia area. And so what if some developers benefit, as they seem to be the Only ones with 'vision', compared to the small town mentality of those adverse to Any change in the status quo.

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145	Letter	Support Gen		Custus	Darlene	I am writing to enthusiastically endorse King of Prussia Rail...The King of Prussia Rail is a vital infrastructure project that cannot be ignored. The Philadelphia region needs to invest in this project to help reduce the burden of highway congestion that is choking our ability to grow jobs and encourage economic development.
146	Hearing	Support Gen	Main Line Chamber of Commerce	Dagenais	Bernard	I am president and CEO of the Main Line Chamber of Commerce. I'm here this evening on behalf of the 950 member companies of the Main Line Chamber of Commerce to speak in favor of the Norristown/King of Prussia Rail extension project...The Main Line Chamber has long been a proponent for public transportation in Greater Philadelphia. The railways used by SEPTA and the city and the suburbs are envied by other regional across the country that did not have the foresight to build rail infrastructure. We believe continued investment in rail is good for the region in general and that this is a project that is an important step that will help area residents to get to jobs, take cars off the road, alleviate congestion, and reduce commuting time for both public transit and highway users...Employees are increasingly seeing public transit options to travel to and from their jobs...The statistic of 5,600 people a day using the bus to travel to King of Prussia is a large number, and the trip by rail would be faster and more efficient with 99 percent on-time performance by the Norristown High Speed Line...There is a cost, an economic impact to traffic congestion that is measurable. The ability for employees to get around and access transit is a major consideration for companies deciding on locations, and there are positive environmental impacts as well.
147	Email	Support Gen		Davies	Eric	...I support KOP Rail! As a person who is employed in a business in the King of Prussia region, I am writing to enthusiastically endorse King of Prussia Rail. King of Prussia Rail is a vital infrastructure project that can't be ignored. The Philadelphia region NEEDS to invest in this project to help reduce the burden of highway congestion that is choking our ability to grow jobs and encourage economic development. I endorse this project and encourage others to join me!
148	Email	Support Gen		Davis	Emily	As a resident of Philadelphia, I am writing to support King of Prussia Rail. I believe this rail service with shorten the commute of many people. Another major benefit will be the reduction of traffic and improvement of air quality and reduce . The Philadelphia region NEEDS to invest in this type of multi-modal transportation to support continued growth in the region. I heartily endorse this project.
149	Email	Support Gen		Defazio	Steve	I have concerns over the proposal to extend rail service into King of Prussia. First, I'd like to say that I'm excited that public transit is being added to this area. However I have doubts about the route. - The route does not include King of Prussia Town Center. This part of the town has been specifically designed to be walkable, and seems ideal for public transit. The place has over two thousand parking spots, and it's still difficult to park during peak times. This is an area that can benefit from public transit immediately, whereas some other parts along the route seem more speculative. Even the artist's depictions of the new train station in the business district include "future redevelopment". - The claim that KoP will be connected with Center City is a bit of a stretch. Estimates from the rail committee about travel times are highly optimistic. From Hughes Park to Suburban Station is at least an hour, for instance. Will there be express trains? - If I want to travel into center city today from Hughes Park, I would drive down to Haverford and take the R5. And that's considering that I live within *walking* distance of the NHSL. I imagine anyone living in King of Prussia would continue to make this choice as it's a much faster/more comfortable ride than the NHSL. - How will this project be funded? I understand half is from a federal grant, but I am concerned that the other half a billion dollars will come from local taxes. If it is totally infeasible to extend the R5, it should be better communicated as to why. This is a concern I am hearing from a lot of people.

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150	Email	Support Gen		Desyatnik	Eugene	I recognize the high cost of the project. I believe it will improve the economic vibrancy of both the city and the King of Prussia area. Tourism is one of the major sectors of Philadelphia's economy. Visitors would appreciate being able to more easily appreciate the history of both valley forge and elfreths alley, visit king of prussia mall and independence mall. With a 40% reverse commute rate, Philadelphia would also benefit from a stronger link to the corporate campus locations that have done so well in the western suburbs. Especially as we hope to attract first class employers to our region, we need to look at ways to better connections between major hubs. i76 is cut into rock and will always be two lanes with many curves. We must find other ways to become better connected as we grow.
151	Hearing	Support Gen		DeVuono	Jeff	I come today as a representative of Brandywine Realty Trust to state our company's full support for the proposed extension of SEPTA's existing Norristown High Speed Line into King of Prussia...Brandywine Realty Trust believes that connecting King of Prussia to Center City and University City via the Norristown High Speed Line is a critically necessary project for our region and a powerful economic engine for the community, the county, the region, and the state...Brandywine Realty Trust believes that this transformative project will increase regional mobility and reduce congestion. Studies show a reduction of up to 18 million automobiles annually, clearly impactful, and save citizens and businesses valuable time and money.
152	Hearing	Support Gen	Pennsylvanians for Transit	Doty	Alex	I represent the group Pennsylvanians for Transit, (which) is connecting more people to jobs in their communities by supporting improvements to public transportation in Pennsylvania...The Philadelphia region is growing. In fact, the Southeast (of PA) accounts for 105 percent of population growth in PA. Transit is the most efficient way to serve the transportation needs of residents and employers as our region grows and as traffic increases. Public transportation like King of Prussia Rail gives us more transportation choices. For some, that means access to an otherwise unreachable job. For others, it might mean saving thousands of dollars by becoming a one-car household. For elderly and disabled passengers, it increases self-sufficiency, giving baby boomers more ability to age in place. The KOP Rail extension makes public transportation a better mobility option for both the existing 5,600 bus passengers and many more who will be attracted by the much more efficient King of Prussia Rail.
153	Letter	Support Gen		Downing	Armel	I am writing to enthusiastically endorse King of Prussia Rail...The King of Prussia Rail is a vital infrastructure project that cannot be ignored. The Philadelphia region needs to invest in this project to help reduce the burden of highway congestion that is choking our ability to grow jobs and encourage economic development.
154	Letter	Support Gen		Downing	Arron	I am writing to enthusiastically endorse King of Prussia Rail...The King of Prussia Rail is a vital infrastructure project that cannot be ignored. The Philadelphia region needs to invest in this project to help reduce the burden of highway congestion that is choking our ability to grow jobs and encourage economic development.
155	Hearing	Support Gen		Drendall	John Scott	...I am basically in favor of the project, but I'm curious how it's going to be paid for...
156	Letter	Support Gen	Valley Forge Park Alliance	Duffy	Molly	I am writing to enthusiastically endorse King of Prussia Rail...The North Gulph Road Connector Trail, which we (Valley Forge Park Alliance) are sponsoring, will allow rail users to access the park via a short trail. Public transportation to the park will be a wonderful thing. The King of Prussia Rail is a vital infrastructure project that cannot be ignored. The Philadelphia region needs to invest in this project to help reduce the burden of highway congestion that is choking our ability to grow jobs and encourage economic development.
157	Letter	Support Gen		Eng	Jefferson	...I am writing to show my enthusiastic support for the proposed King of Prussia Rail Project...I believe that this public transit proposal would be very beneficial for the continued economic support for residents and commuters within this region...

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158	Website	Support Gen		Ferguson	Shani	My sister lived in King of Prussia for several years, and access was very difficult. Having a rail option to get from my Center City home would have been a great asset to our family, and to other families like ours. Furthermore, the ability to reach the mall (and other shopping areas) by rail would vastly increase the amount of money spent on retail and dining. I hope that the project will not be derailed by the regressive, NIMBY attitudes of the few, when the benefits to the many are incontrovertible.
159	Form	Support Gen		Francis	Taktim	I feel like it will be very useful & save people time & money.
160	Hearing	Support Gen	Economy League of Greater Philadelphia	Frontino	Nick	...While King of Prussia's many existing assets, diversity of employment opportunities, and strong investment pipeline point to a bright future for our area, vehicle congestion and limited transportation choices present obstacles to sustain growth. By providing a congestion free transit connection to Philadelphia, Norristown, and other destinations in Montgomery and Delaware Counties, the proposed King of Prussia Rail Project will help unlock the economic potential of King of Prussia, and in turn, drive growth and opportunity for the region as a whole. Public transportation is about more than connecting people to destinations. Transit investment can also shape land use and development patterns, generate jobs and enable economic growth and provide environmental benefits. At the Economy League of Greater Philadelphia, we believe that a shared understanding of King of Prussia Rail's potential benefits is fundamental to productive dialogue, so we are happy to partner with SEPTA, DVRPC, and Econsult Solutions to conduct an evaluation of the benefits that the project is expected to bring to people and businesses in and around the King of Prussia area, as well as the region as a whole. Our analysis estimates that around 60 percent of the cost to build the project, between \$610 and \$710 million, will be spent within Southeastern Pennsylvania, and support between 5,400 and 6,300 jobs. Capital investment in King of Prussia Rail is expected to generate between \$20 and \$22 million in tax revenues in Pennsylvania. We estimate that KOP Rail will reduce the average transit trip from Center City to King of Prussia by 30 minutes or more. And drivers switching to transit as a result of KOP Rail will lead to an annual reduction of up to 18 million vehicle miles traveled. Finally, development stimulated by the introduction of KOP Rail is expected to add between \$540 and \$946 million to the assessed value of King of Prussia real estate over 20 years...
161	Website	Support Gen		Gillespie	Christopher	I like it, I'm for it, you should do it.
162	Email	Not project		Gnt	Ajay	I support the new rail line connecting King of Prussia and Philadelphia Airport
163	Hearing	Support Gen	King of Prussia Business Improvement District	Goldstein	Eric	On behalf of the board of directors, committee members, 301 commercial property owners of Upper Merion Township, and the staff of the King of Prussia District, I am here to enthusiastically support the King of Prussia Rail...King of Prussia District believes that the extension of the Norristown High Speed Line is necessary to continue the momentum that has been created. We know that the most successful markets in the United States are those that offer a variety of modes of transportation. King of Prussia Rail is an essential investment in that regard. King of Prussia Rail will help steer future development into concentrated areas that can handle the growth without causing additional burdens on township roadways and resources. King of Prussia Rail will provide opportunities for mixed-use development that will blend employment opportunities with residential living, the key to traffic mitigation. Widening roadways is not the cure for congestion issues. The best way to address traffic and congestion is to convert commuters into residents by adding high quality housing opportunities and expand public transportation options so that the use of single-occupancy vehicles is not the only mode available. King of Prussia District also believes that the King of Prussia Rail will help residents of the township reduce commute times to University City and Center City by as much as 30 minutes each day, connect employers to a broader pool of employees, and give residents easier access to jobs along the route...We will reduce up to 18 million vehicle miles traveled annually, resulting in less congestion and reduced emission; generate 5,400 to 6,300 direct and indirect jobs during construction and 1,000 jobs annually thereafter; increased commercial real estate values, which in turn increase tax revenues, this will ensure that the residents of King of Prussia maintain their extremely low property taxes; it will provide efficient and dependable passenger rail service to the largest employment center in the township.

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Comment Number	Form	Topic	Organization/ Agency	Last	First	Comment
164	Email	Support Gen		Goodman	Randal	I have been a resident of Upper Merion Township since 1983. In that time, I have seen many positive and not so positive things happen in our community. One of the best things to possibly happen here is the building of the King of Prussia Rail. KoP Rail will provide many benefits to our community, not the least of which are: · Provide my neighbors and me with better access to jobs in the city, · Reduce commuting times, · Address the growing mobility needs of seniors, people with disabilities and the younger generations. King of Prussia Rail would provide more flexible infrastructure. The Greater Philadelphia Region must invest in this type of multi-modal transportation project to help reduce the burden of highway congestion and provide better access to job opportunities and more for my neighbors and others in our region. I endorse this project and encourage others to join me!
165	Hearing	Support Gen		Hakimfar	Benjamin	I just came tonight on behalf of Wurzak Hotel Group. We own two hotels in the King of Prussia area, one being the Hyatt Place on American, which is directly adjacent to a stop that would be for the proposed rail. The other one is Sheraton Valley Forge, which is not in close proximity to a proposed stop, but we're still very supportive of this rail. Many of our employees at the hotels have to take up to three buses to get to work, which is not practical. Of course, hiring becomes almost impossible as well since the market is very limited due to limited transportation...I think the rail would not only be a positive for providing more jobs in the area and accessibility to jobs, but will encourage more employees to live in the area as well...Someone as myself, who commutes every day to King of Purssia from Center City, I too an affected by the commute as 76 is always at least over an hour to get here even though I am only 20 miles away, and the weekend is worse than that...
166	Letter	Support Gen		Harris	Dominique	I am writing to enthusiastically endorse King of Prussia Rail...The King of Prussia Rail is a vital infrastructure project that cannot be ignored. The Philadelphia region needs to invest in this project to help reduce the burden of highway congestion that is choking our ability to grow jobs and encourage economic development.
167	Email	Support Gen		Harrison	Tasheba	...I support KOP Rail! We need transportation that connects to the mall. It would be more convenient and safer for people.
168	Hearing	Support Gen		Hart	Bob	On behalf of King of Prussia Mall I'm here to support and endorse the King of Prussia Rail Project...The rail will make it more convenient for both customers and employees to visit the mall. It is projected that ridership on the Norristown High Speed Line will increase by up to 80 percent when the rail's in operation. This will help reduce congestion on our area roadways. The high speed rail is a comfortable and convenient way to travel. We all know what the commute is like on the Schuylkill Expressway between Philadelphia and King of Prussia. The High Speed Line will make a great alternative, make it much easier, and significantly reduce the travel time from Philly to KOP. The King of Prussia Rail will also help our office park. Public transportation is very important to office employees. With high speed rail stops at First Avenue in the business park, the high speed rail line will definitely help our office park with increased occupancy and added value to the community.
169	Email	Support Gen		Hayman	Karen	I am employed in King of Prussia, I am writing to enthusiastically endorse King of Prussia Rail. I endorse this project. I work in a law firm in KOP. Some of our employees drive long distances to get here and it limits the ability of many qualified people from accepting jobs in this area. We had an employee who traveled over 2 hours each way from Philadelphia due to the lack of connected public transportation. She did a great job, but the commute got to be too much. Asking someone to spend over 4 hours a day traveling to and from work is a hard sell.
170	Email	Support Gen		(no name given)	Heisey	We support this rail line

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171	Hearing	Support Gen	Greater Valley Forge Transportation Management Association	Henry	Rob	Greater Valley Forge Transportation Management Association has been headquartered in King of Prussia for over 27 years and our mission is to achieve a desirable quality of life and healthy competitive economic environment by developing multi-faceted transportation services...The King of Prussia Rail extension is a much-needed enhancement to this community and our region for a variety of reasons. Our organization was founded in partnership with Upper Merion Township in 1990 as employers were struggling to get their employees to and from work. We've worked on highway projects, trail extension, enhancements to SEPTA's bus and local bus service, and many others; but as the community has continued to grow, so has congestion. The King of Prussia Rail project would be an amazing amenity for Upper Merion and the region for many years to come...I applaud SEPTA and the King of Prussia Coalition, of which we are a founding member, for moving this much-needed project forward.
172	Letter	Support Gen		Hernandez	Graciela	I am writing to enthusiastically endorse King of Prussia Rail...The King of Prussia Rail is a vital infrastructure project that cannot be ignored. The Philadelphia region needs to invest in this project to help reduce the burden of highway congestion that is choking our ability to grow jobs and encourage economic development.
173	Letter	Support Gen		Hershberg	Dan	As a business owner new to the King of Prussia region, I am writing to share my endorsement for the King of Prussia Rail...We (Workhorse Brewing Company), were excited to learn of the King of Prussia Rail project and believe that it is a vital infrastructure project for the community...
174	Hearing	Support Gen		Holak	Jim	On behalf of my colleagues at Urban Engineering, I'd like to thank you for the opportunity to enthusiastically endorse what we consider to be one of the most vital infrastructure projects in the Delaware Valley in quite some time...Urban is acutely aware how projects like the King of Prussia Rail project extension can enhance the region's economy, mobility, and movability. Conscious of the ever-present fiscal and budgetary restraints facing our world today, we as a community cannot accept the future where our children and our grandchildren are going to be confronted with an environment that failed to (implement) infrastructure improvements. We believe the King of Prussia project will provide significant urban and economic growth for the region, better access for our region's residents to commute to jobs, schools, and social events in King of Prussia, Center City, University City, and Delaware County regions. Reduce vehicular congestion, and improve air quality around the wonderful urban areas surrounded by this project. The Philadelphia region needs to support and invest in this project to help reduce the burden of highway congestion that is choking our ability to grow jobs and encourage economic development in the region.
175	Website	Support Gen		Hugg	Christopher	I think that there should be 2 tracks going one way (one of those being an express track and the other being a local track) and 2 going the other way so that you can accommodate express and local services together on separate tracks with minimal disruption (instead of one way express and local services sharing one track one way they have their own track). This is also good because if one track is out of service then trains can be rerouted to use 3/4 tracks instead of a 2 track system being like 1/2 tracks can be used only (example NHSL single tracking just recently due to construction).
176	Letter	Support Gen		Jackson	Wilbert	I am writing to enthusiastically endorse King of Prussia Rail...The King of Prussia Rail is a vital infrastructure project that cannot be ignored. The Philadelphia region needs to invest in this project to help reduce the burden of highway congestion that is choking our ability to grow jobs and encourage economic development.
177	Email	Support Gen		Jaeger	Wolfgang	I support the rail extension to KoP
178	Letter	Support Gen		Jefferson	Candace	I am writing to enthusiastically endorse King of Prussia Rail...The King of Prussia Rail is a vital infrastructure project that cannot be ignored. The Philadelphia region needs to invest in this project to help reduce the burden of highway congestion that is choking our ability to grow jobs and encourage economic development.
179	Website	Support Gen		Jobanputra	Pankaj	I strongly support this initiative to bring a much needed form of transportation to this thriving and growing location.
180	Form	Support Gen		Johnson	Andre	Please build rail to bring more workers and visitors to the Mall.

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Comment Number	Form	Topic	Organization/ Agency	Last	First	Comment
181	Letter	Support Gen		Johnson	I-Sheena	I am writing to enthusiastically endorse King of Prussia Rail...The King of Prussia Rail is a vital infrastructure project that cannot be ignored. The Philadelphia region needs to invest in this project to help reduce the burden of highway congestion that is choking our ability to grow jobs and encourage economic development.
182	Letter	Support Gen		Johnson	Ronald	I am writing to enthusiastically endorse King of Prussia Rail...The King of Prussia Rail is a vital infrastructure project that cannot be ignored. The Philadelphia region needs to invest in this project to help reduce the burden of highway congestion that is choking our ability to grow jobs and encourage economic development.
183	Hearing	Support Gen	Borough of Norristown, PA	Jones	Crandall	The project is important to the municipality of Norristown for a number of reasons. One has to do, certainly, with jobs creation, both short-term jobs that will be created by the construction and related services of the project development, but also long-term jobs that are created just because of the jobs that currently exist and will exist in King of Purssia. Right now what we're seeing in terms of our own development is an influx of new residents who consistently say they move here because of proximity to their work. A lot of times that work is in King of Prussia, sometimes that work is beyond King of Prussia. One of the consistent things they say about that is I wanted to get great prices on a home, but I didn't want to have to deal with the traffic issues that are related to trying to get to my job. So, if there can be an opportunity to jump on a train and go straight to King of Purssia, that's certainly better for them...As you know, it's four miles from here to King of Prussia, but in congestion that exists to get from here to King of Prussia, that four miles can be 25 to 30 minutes. Sometimes that makes a large difference in did I get to work on time or didn't I get to work on time...Because a lot of folks don't have access to personal transportation, so public transporation is that best option.
184	Hearing	Support Gen	Municipal Council, Norristown, PA	Jones	Hakim	I've spent my life going back and forth from Norristown to the King of Prussia Mall, so I do see this project being something beneficial to the community of Norristown, many of the elderly as well as the teenagers that spend much of their time working in the mall and different stores around it. I do also commend SEPTA. You've been pretty transparent. There were some concerns in the beginning, but you've done great work outlining graphs, data, and studies to pretty much prove that you're looking out for the best interests of both Norristown, Bridgeport and King of Prussia residents. So, I think we as a council should support this, as it's not just going to affect the King of Prussia region, but it's also going to be a good increase and a good boost for us.
185	Letter	Support Gen		Joyce-Kershner	Maurya	I am writing to enthusiastically endorse King of Prussia Rail...The King of Prussia Rail is a vital infrastructure project that cannot be ignored. The Philadelphia region needs to invest in this project to help reduce the burden of highway congestion that is choking our ability to grow jobs and encourage economic development.
186	Hearing	Support Gen		Kamp	Jacqueline	I'm very much in favor of this transit line. I think that it will be an asset to the community and I think that in looking at the impacts on the community, one of my strongest reasons for being very much in favor is that I've lived here long enough that I've watched the impact of the automobile infrastructure on the community over the last 50 years, and it has not been positive. The roads just keep getting wider, the traffic gets worse. We make roads wider again, the traffic gets worse again. It is not a solution to continue to make "roads wider, traffic move faster, more volume to move through town." And over the course of the years that we've been using that as a solution to our transportation problems, the continuity of our community has suffered. As the roads get wider, they cut parts of the community off from one another. They make it impossible for children to walk to school. And I just think that as we're looking at potential pros and cons of this rail line, we just need to realize that over the last 50 years, while the progression of the car infrastructure has been gradual, it has been significant and it has been detrimental, and looking for solutions that are more sustainable and that meet the lifestyle preferences of the younger generations coming up is not only good for the ecooomy, but it is good for the residents of the township and the quality of life in our community.

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Comment Number	Form	Topic	Organization/ Agency	Last	First	Comment
187	Website	Support Gen		Karpinski	Jeff	As a 40-year resident of King of Prussia, I'd like to express my enthusiastic support for the NHSL expansion project. I've watched our area grow from a sleepy bedroom community into a vibrant economic, business, and residential center; at the same time I've seen it become less livable due to its dependence on auto transportation. We're long past the tipping point where the region's density not just could support a rail option but almost demands it. That said, I'm concerned that there's a level of opposition among certain residents that's not justified by facts but may still impede progress, and I urge the Coalition to address these issues proactively. In particular there have been a number of comments that can be summarized as "the line doesn't benefit me, so I'm opposed to it". In fact, every one of us who lives here will be helped, whether it's through reduced congestion, additional travel options, or by having a broad range of employment opportunities that will allow more people to work locally and will support the community through the taxes those businesses pay. Similar rail projects in other areas have been a "win" for those regions, and I fully hope and expect that the NHSL expansion will do the same for Upper Merion.
188	Website	Support Gen		Kern	Keyleigh	I am an occasional rider of the 125 for both work and shopping - and I love that it exists. However, having a faster and more reliable "last mile" in KOP from gulph mills that isn't at the mercy of highway traffic would be a game changer for getting out there.
189	Email	Support Gen		Kettell	Robby	...I support KOP Rail! I live in Center City and seldom drive to KOP, but might be tempted to go if I could get there easily on public transportation.
190	Hearing	Support Gen		Kirse	Eric	I'd like to just express my gratitude for the people who are putting this rail project together. It's something that when I first moved here I was kind of disappointed not to be able to take a train ride somewhere. I'm also on board with increasing desire to go green and and improve our ability to reduce the congestion in this area. The other thing on my list of items is that some people have brought up the 69th Street transfer. And I think it's an important thing to consider in the overall course of the project to be able to go straight into Center City, if possible.
191	Hearing	Support Gen		Klein	Dan	I want to express my support for the King of Prussia Rail Project for the following three reasons: it has the potential to add up to 10 percent in value to homes within three miles of each station; it would be a great alternative to our congested local roads; and it provides environmental benefits. I advise SEPTA to continue to work with regional and local stakeholders to find common ground in order to see this project through to completion.
192	Letter	Support Gen		Kubach, Jr.	Richard	I am writing to enthusiastically endorse King of Prussia Rail...The King of Prussia Rail is a vital infrastructure project that cannot be ignored. The Philadelphia region needs to invest in this project to help reduce the burden of highway congestion that is choking our ability to grow jobs and encourage economic development.
193	Email	Support Gen		Landes	Mike	I fully support the King of Prussia rail line extension from Bridgeport to King of Prussia which will connect center city Philadelphia to King of Prussia by rail and thereby provide an alternative to automobile transit in this corridor, whose roads are maxed out at this point.
194	Form	Support Gen		Landis	John	Excellent idea!
195	Hearing	Support Gen		Lang	Adam	...I just wanted to add my support, not in particularly any specific alternative routes that are proposed, but just the idea that something does need to be done to help the average workforce get to and from where they're working in a way that doesn't involve an hour and a half on the Schuylkill...
196	Email	Support Gen		Lau	Jennifer	I strongly support the rail line into King of Prussia!
197	Hearing	Support Gen		Leahy	Tom	I'm from Collegeville Borough. We completed a rail trail project through the borough, somewhat intrusive, but none of the fears came true. The value of our homes went up, no evidence of any increased crime or traffic. So, I am very much in favor of this project...
198	Letter	Support Gen		Lebron	Kryzia	I am writing to enthusiastically endorse King of Prussia Rail...The King of Prussia Rail is a vital infrastructure project that cannot be ignored. The Philadelphia region needs to invest in this project to help reduce the burden of highway congestion that is choking our ability to grow jobs and encourage economic development.
199	Website	Support Gen		Lennick	N.	I support the KOP rail project. Please move forward with the newly proposed solution that does not have trains in homeowners' yards.

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Comment Number	Form	Topic	Organization/ Agency	Last	First	Comment
200	Email	Support Gen		Libby	Patricia	...I support KOP Rail! I have now ridden the buses twice from the Wissahickon Transfer Center to KOP Mall and was horrified to see all the riders who had to STAND THE WHOLE DISTANCE because the buses are so very full. And I wasn't traveling during rush hour!! We either need buses EVERY FIVE MINUTES or very cheap trains to the mall (since many who ride the buses may not be able to afford trains)!!!
201	Email	Support Gen		Lissner	Kim	...I support KOP Rail! As a person is employed at a business in the King of Prussia region, I am writing to enthusiastically endorse King of Prussia Rail. King of Prussia Rail is a vital infrastructure project that can't be ignored. The Philadelphia region NEEDS to invest in this project to help reduce the burden of highway congestion that is choking our ability to grow jobs and encourage economic development. I endorse this project and encourage others to join me!
202	Letter	Support Gen		Long	Mark	I am writing to enthusiastically endorse King of Prussia Rail...The King of Prussia Rail is a vital infrastructure project that cannot be ignored. The Philadelphia region needs to invest in this project to help reduce the burden of highway congestion that is choking our ability to grow jobs and encourage economic development.
203	Form	Support Gen		MacDonald	Matt	I believe this concept would be a great idea to implement.
204	Website	Support Gen		Marchetti	Angela	I am very happy with this proposed rail system going into KOP. Though I only live 4 miles from the mall in Bridgeport, it can sometimes take up to 40 minutes just to move on Rt 202 going southbound. Not to mention the amount of traffic into the mall, trying to find and fight for parking, etc. This will open up a world of opportunities not only on the jobs side, but connecting paths together, just like we are doing with the local trails to the SRT. Great job!! Many of us look forward to this and hopefully someday, a proposed rail up to Pottstown/Reading!! Because nobody has time for 422 traffic. Nobody.
205	Letter	Support Gen	Valley Forge Tourism & Convention Board	Markezin	Jake	I am currently employed at a company on First Avenue in King of Prussia and am writing in support of the proposed King of Prussia Rail. The project is a no-Brainer. As someone who has commuted to and from King of Prussia daily for close to 10 years, I have seen first-hand the increase in traffic and congestion. This project needs to get done...King of Prussia Rail is a vital infrastructure project that cannot be ignored....
206	Email	Support Gen		McCloy	Samantha	A new light-rail train line is proposed to run from the Norristown Line, which connects to Philadelphia and its airport, to King of Prussia. This will allow people who live in Philadelphia and Norristown who do not have cars to get here safely and inexpensively. I support this plan.
207	Letter	Support Gen		McCrea	Chanelle	I am writing to enthusiastically endorse King of Prussia Rail...The King of Prussia Rail is a vital infrastructure project that cannot be ignored. The Philadelphia region needs to invest in this project to help reduce the burden of highway congestion that is choking our ability to grow jobs and encourage economic development.
208	Email	Support Gen		McCune	Michael	I would like to voice my support for the light-rail train line which is proposed to run from the Norristown Line, which connects to Philadelphia and its airport, to King of Prussia.
209	Website	Support Gen		McDermott	Robert	I won't be able to make public meetings, but I wanted to be a voice of support for the KOP rail. Projects like this get drowned out by people who are against it, but a ton of people are for this project. Expanding rail service in the metro area is SO critical to the area's continued growth and economic expansion. Please continue with this project, and consider moving our RR service towards a light rail system through prepayment and increased frequency and increase BRT services! This is what people who use SEPTA want.
210	Email	Support Gen		McDonough	George	...I support KOP Rail! As a person who is employed at a business in the King of Prussia region, I am writing to enthusiastically endorse King of Prussia Rail. King of Prussia Rail is a vital infrastructure project that can't be ignored. The Philadelphia region NEEDS to invest in this project to help reduce the burden of highway congestion that is choking our ability to grow jobs and encourage economic development. I endorse this project and encourage others to join me!

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Comment Number	Form	Topic	Organization/ Agency	Last	First	Comment
211	Email	Support Gen		McNeely	Ernie	I am writing to endorse King of Prussia Rail. This rail line while not traversing Lower Merion Township is easily accessible along the Township's border. It is easily accessible and used by Lower Merion Township residents but it would be a far greater asset if it actually connected to King of Prussia instead of terminating in Norristown. It is my opinion that King of Prussia Rail will, if the project is completed, provide an outstanding benefit to the entire region. King of Prussia Rail is a vital infrastructure project that can't be ignored. The Philadelphia region needs to invest in this project to help reduce the burden of highway congestion that is choking our ability to grow jobs and encourage economic development. The highway congestion is harming the quality of life for residents in the region and there is no way new highways can be built or expanded to fix the problem. I hope this project will proceed to implementation as soon as possible.
212	Letter	Support Gen	Clean Air Council	Minott, Esq.	Joseph Otis	Clean Air Council strongly supports the King of Prussia Rail extension of the Norristown High Speed Line...This project will improve air quality and public health for all residents of the greater Philadelphia region and downwind communities...
213	Hearing	Support Gen		Moiani	James	I just want to start out by stating, of course, my Dad does work for SEPTA Management, but I don't speak for him. I just speak enthusiastically in support of the project for the simple reason that I live in Haverford Township and work in Upper Merion just up the hill from where one of the stops (is), so I would use it. I have heard criticism that it's not going to convert drivers to riders. I'm definitely an example of that not being true...I want to counter the notion as well that it will hurt property values, I just bought a house in Haverford Township and...I can tell you from a very recent experience that the closer you get to transit access, the more expensive things get and not less...If I did live right in one of those neighborhoods (in Upper Merion), there isn't really a stop for me...Building a stop that would require like a lot of pedestrian access or maybe some walkways or something over the Turnpike (to benefit residents)...
214	Email	Support Gen		(no name given)	Molly	I want to offer my support for the new proposed rail line linking King of Prussia with the Philadelphia airport. Thousands of Suburban residents travel from the KoP area to Philadelphia each day for business flights. Having a rail line that connects King of Prussia with the Philadelphia international airport would be amazingly convenient for all of the area business employees and suburbanites who have to travel by air for work each week.
215	Website	Support Gen		Murphy	Dennis	Considering that much of the congestion and traffic in and around KoP has to do with people commuting to and from work via the Turnpike (and 476), why aren't we looking at connecting KoP to the suburbs to the east by way of the Turnpike? I work in Wayne, PA near the new town center and of the few hundred folks in my office, I think only 2 commute from the city. The rest are commuting from Montgomery and Bucks county and many are coming by way of the Turnpike (which is an absolute mess). I would most definitely consider riding a train to work as it would increase my productivity by giving me the ability to work on my commutes as opposed to sitting in traffic.
216	Hearing	Support Gen		Nardone	Anita	The rail extension will not only help our (Dawood) employees service our clients in the Philadelphia areas well as out here in the suburbs, but also lend to the attractiveness of working for a company that is easily accessible by rail.
217	Website	Support Gen		Neely	Jason	It is encouraging to see plans for public transportation improvements. For long term viability, please ensure the route, stations and technology are compatible with existing lines to ease maintenance, upkeep and future improvements. Lest this not be a flight of fancy for a small portion of users, but rather a continuous and contiguous well thought route from phl to kop and many retail, hotel, residential and public works. Inclusion of ready access to the National Park at Valley Forge, and established residential properties is key.
218	Website	Support Gen		Niemynski	Andrew	I am in full support of this project. Personally it will become much easier for me to get to King Of Prussia. Overall it will be beneficial to the region by better connecting people. 76 and 202 are extremely overcrowded and people keep building in these areas. Studies show that people are getting tired of long driving commutes which add to stress. A rail line would eliminate that.
219	Website	Support Gen		O'Donnell	Joe	The extension of the rail line to and through King of Prussia would be highly, positively impactful. I deeply support the rail line and economic boom that would come with it. Thank you.

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220	Hearing	Support Gen	Drexel University	Orris	Keith	We support the KOP Rail initiative. We're living in a unique period in the Philadelphia region, where time is no longer marked by a declining urban core ringed with pockets of growth, but rather, today we are in an era of a vibrant and rebounding urban core with many centers of growth. To keep that positive economic (trend) and avoiding a reversal, we as leaders and citizens of the region must ensure three things are available: job growth, quality education, and a growing tax base. The one factor linking these new economic imperatives is transportation, and in particular, rail transportation given our region's instability. The KOP Rail Project represents the perfect type of transportation project needed for Philadelphia's new era because it will connect the largest and growing employment centers in the region: Center City, University City, and King of Prussia. By building this project, we make it possible for more of our citizens to secure jobs no matter where they live. It also has two other key economic benefits, it reduces the commuting time of workers by nearly half from Center City to King of Prussia, and it reduces congestion and maintenance costs for our regional road system, in particular, the Schuylkill Expressway, as well as reducing overall vehicular emissions. The KOP Line also will increase accessibility for our citizens to higher education. Today's employers require continuous training and education, causing employees to embrace lifelong learning...The Philadelphia region, with over a hundred degree-granting institutions of higher education, has the capacity to provide these educational services through more frequent trains and connections to the three main development centers...With greater accessibility to jobs and education comes increasing tax revenues from income and property; property taxes in particular, enhance the values of property near the three centers of the KOP line. The public schools then prosper, making the KOP Rail Line able to benefit an entire continuum of education...With greater access to education, our citizens can find higher paying jobs. With more citizens working, tax revenues increase, allowing for investment in our public schools and municipal services.
221	Letter	Support Gen		Orr	Tajh	I am writing to enthusiastically endorse King of Prussia Rail...The King of Prussia Rail is a vital infrastructure project that cannot be ignored. The Philadelphia region needs to invest in this project to help reduce the burden of highway congestion that is choking our ability to grow jobs and encourage economic development.
222	Email	Support Gen		Oslick	Avram	Anyone who doesn't want the rail line is probably a racist
223	Form	Support Gen		Paige	Kijuan	I think this is a great ideal for SEPTA to finally put a rail system out here @ KOP because I live in Delaware and it takes forever to travel up to KOP for work. I'm always late for work.
224	Email	Support Gen		Palena	Bryn	I would like to ensure that my support is noted for the new light-rail train line is proposed to run from the Norristown Line, which connects to Philadelphia, Center City and the airport, to the Valley Forge Radisson Hotel right in front of my office in King of Prussia.
225	Website	Support Gen		Patel	Varun	I hope this project goes through. This is good for reducing traffic and helps people who cant afford car to live in king of prussia.
226	Form	Support Gen		Patton	Peter	I view the extension of the NHSL as a strong positive for the region and the environment. I use the NHSL frequently to commute to Center City, Philadelphia. Overall, it is a good means to commute, particularly when the externalities of use of an auto (sprawl, pollution, global warming, and destruction of nature) are taken into account. When the NHSL (is) extended to KOP, I would be able to travel to KOP for shopping, entertainment and pleasure. I live in close proximity to the NHSL. Overall, it is a plus for the environment as it reduces local traffic and is relatively quiet.

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227	Hearing	Support Gen	Valley Forge Casino Resort	Pearson	Eric	We (Valley Forge Casino Resort) are excited by the prospect of extending rail service to destinations in King of Prussia and Upper Merion Township by SEPTA's Norristown High Speed Line. Not just because we would be a stop near our property, but the rail provides much needed transportation service and will alleviate many current issues. One of them being alleviating some employee concerns...Many of Valley Forge Casino Resort's employees, approximately 25 percent, are Philadelphia residents and travel to work by bus, or some may take the train to Norristown and take the bus to our property from there. King of Prussia Rail would be significantly more convenient and would dramatically decrease employees' commute times to work. The rail line would help decrease employee turnover and fill late night shifts. Contending with daily traffic congestion is frequently cited as a significant reason of why our employees decide to leave. The hardest shifts for us to fill are late night shifts because there's no or limited access to public transportation. We know the rail line will help us attract and retain employees. The rail line will also make it easier for the public to access our property, and provide more parking options. KOP Rail will provide easier access for guests attending meetings, conventions, concerts, and other large events. Economic growth will also be spurred, enabling greater opportunities to attract customers to the property. Having more transit connections between KOP and the region makes the area more attractive to employers, and encourages economic growth, which drives more business for all companies in the area. And more business means greater benefits to Upper Merion Township. In 2013, the township and the Valley Forge Casion partnered to form the Board of Community Assistance, which provides financial help to organizations by grants funded by the casino to benefit residents of Upper Merion and scholarships for graduating high school seniors. Last year, from contributions made to Valley Forge, the VCA awarded over a hundred and fifty thousand dollars to 65 recipients including 40 organizations and 25 scholarships. In addition to this, there's the two percent of gaming revenue that is paid to Upper Merion Townhsip as part of our local share. By leveraging Valley Forge Casino Resort business, King of Prussia Rail will be a catalyst that allows us to continue to partner and help grow the community.
228	Hearing	Support Gen	Mayor Willie Scott, City of Reading	Perugini	Louis	I'm just here to represent the Mayor of Reading, Willie Scott...I hear the naysayers about rail service. The United States has probably the worst rail service, for a country as rich as it is, in the whole world...Why there's any opposition is beyond imagination, but it's there. I want just to let people know that we're just as concerned in the north of King of Prussia, bringing customers into the mall and Philadelphia from Pottsville and many of the coal regions as much as your concern is to bring them in from the south to obviate the need to go on the Schuylkill Expressway. So it there's some way that at least we can show that we're interested and along the way keep pursuing the idea, we're all for it.
229	Letter	Support Gen		Peters	Michael	I am writing to enthusiastically endorse King of Prussia Rail...The King of Prussia Rail is a vital infrastructure project that cannot be ignored. The Philadelphia region needs to invest in this project to help reduce the burden of highway congestion that is choking our ability to grow jobs and encourage economic development.
230	Letter	Support Gen		Pio	Francisca	I am writing to enthusiastically endorse King of Prussia Rail...The King of Prussia Rail is a vital infrastructure project that cannot be ignored. The Philadelphia region needs to invest in this project to help reduce the burden of highway congestion that is choking our ability to grow jobs and encourage economic development.
231	Hearing	Support Gen	UGI Utilities, Inc.	Platt	Dan	I'm here this evening to read a letter on behalf of John Walsh, president and CEO of UGI Corporation. As an employer of approximately 450 people in King of Prussia, I am writing on behalf of UGI Corporation and AmeriGas to actively endorse King of Prussia Rail. I believe that this vital infrastructure project will provide significant benefits to the residents, employees and businesses of Upper Merion Township and the Greater Philadelphia region. This direct transportation alternative connecting Philadelphia to the largest commercial center in the suburban region will reduce traffic congestion, enhance economic development in the local community, and broaden access to quality employees for employers in King of Prussia such as UGI...UGI, along with our affiliate, AmeriGas, has been an employer in King of Prussia for more than 40 years and we place significant value on our long-term and successful partnership with the local community. UGI endorses King of Prussia Rail and we encourage our community business partners to do so as well.

King of Prussia Rail Extension Project - Public Comments on the DEIS

Comment Number	Form	Topic	Organization/ Agency	Last	First	Comment
232	Form	Support Gen		Polite	Kristen	This new rail line would be a great asset to the community. It will be a convenience to many individuals who take the bus to Center City. Personally, I have to take two to get to Center City that's roughly one hour and thirty minute commute; not including traffic. I definitely support this new plan!
233	Email	Support Gen		Poplett	James	As a resident of Upper Merion Township, I am writing to enthusiastically endorse King of Prussia Rail. My wife and I enjoy traveling into Philadelphia for leisure, but find the driving and parking requirements to be prohibitive. We no longer travel into Philadelphia on weekdays because we know how long we will be sat in traffic to and from wherever we are going, and have to pay \$20+ for a few hours of parking each time. If there was a high speed rail option in King of Prussia, we would travel into Philadelphia at least twice as often as we currently do. I feel that many other King of Prussia residents would do the same, and this would be a boost to the Philadelphia economy. Having a high speed rail line in King of Prussia would also likely increase the value of our property. I endorse this project and encourage others to join me!
234	Website	Support Gen		Quinn	William	I think the King of Prussia Rail Project would be a fantastic asset for our community. King of Prussia needs a break from all of the crazy traffic and congestion in the area and this could provide a much-needed relief. Just think of how many businesses would open up in kop if there was easier Transit access. As for the people who are critical of this expansion, the locally preferred alternative does not directly come into contact with any Residential Properties in the Valley Forge Homes Community. We're not bulldozing a neighborhood, and there's already a free way there. With sound barriers. As for the 9/11 memorial questions, the rail line does not directly pass over it. Also Arlington National Cemetery, the cemetery that is dedicated to our nation's war heroes, has a DC Metro station right next to it. And has had one for over three decades. If we want King of Prussia to expand, we need to build this rail line.
235	Letter	Support Gen		Ray, Jr.	John	I am writing to enthusiastically endorse King of Prussia Rail...The King of Prussia Rail is a vital infrastructure project that cannot be ignored. The Philadelphia region needs to invest in this project to help reduce the burden of highway congestion that is choking our ability to grow jobs and encourage economic development.
236	Website	Support Gen		Robb	Maria Susan	A rail system to the King of Prussia area would allow city people an alternative to the 124 and 125 bus lines. It could bring in more shoppers and workers into the area and vice versa.
237	Letter	Support Gen		Rodriguez	Adelaida	I am writing to enthusiastically endorse King of Prussia Rail...The King of Prussia Rail is a vital infrastructure project that cannot be ignored. The Philadelphia region needs to invest in this project to help reduce the burden of highway congestion that is choking our ability to grow jobs and encourage economic development.
238	Email	Support Gen		Roman	Ehab	I support the King of Prussia Rail! As a person is employed at a business in the King of Prussia region, I am writing to enthusiastically endorse King of Prussia Rail. King of Prussia Rail is a vital infrastructure project that can't be ignored. The Philadelphia region NEEDS to invest in this project to help reduce the burden of highway congestion that is choking our ability to grow jobs and encourage economic development. I endorse this project and encourage others to join me!
239	Hearing	Support Gen		Ross	Martin	As a resident of King of Prussia, I shop and dine at all of the local establishments. The people who are preparing your food, the people who are ringing you up at the register...these are the people who are not here today. These are the people that I see, at night driving around, waiting for the bus at all different hours of the night in the dark, in the rain. These are the people who will benefit from the rail extension. Being fortunate enough to be able to purchase a car myself, I don't have an issue with needing the rail, but many, many people do, coming in and out of the city from different areas...With not only blue collar, but white collar passengers as well, for everyone who does not care to sit in traffic.
240	Email	Support Gen		Ryder	David	...I support KOP Rail! Get cars off the street. Provide better access to city labor. Reduce pollution.

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Comment Number	Form	Topic	Organization/ Agency	Last	First	Comment
241	Email	Support Gen		Sands	Jeffrey	...I support KOP Rail! As a person is employed at a business in the King of Prussia region, I am writing to enthusiastically endorse King of Prussia Rail. King of Prussia Rail is a vital infrastructure project that can't be ignored. The Philadelphia region NEEDS to invest in this project to help reduce the burden of highway congestion that is choking our ability to grow jobs and encourage economic development. I endorse this project and encourage others to join me!
242	Hearing	Support Gen	Chamber of Commerce for Greater Philadelphia	Sauter	Anselm	The Chamber of Commerce for Greater Philadelphia is committed to supporting and continuing the transformation of our community into a global region that fosters economic growth, attracts and retains a skilled workforce, and strengthens the region's existing industries and institutions... The Chamber recently worked with public and private partners to develop a plan called Connecting the Region, a Transportation Strategy for Greater Philadelphia. This strategic portfolio of interconnecting transportation projects identifies nine key infrastructure investment areas that are likely to accelerate development and general growth, and transform our region...The King of Prussia Rail project is one of nine project areas we see as critical to the continued development of our area...King of Prussia Rail will not only connect businesses with reliable and timely rail service, but it would also accelerate job growth and employer investment. Our Chamber and its leadership believe firmly in the importance of this project...
243	Hearing	Support Gen		Schallack	Vanessa	I say this is definitely needed. One thing that's not being addressed is safety issues.
244	Letter	Support Gen		Schrock	Juanita	I am writing to enthusiastically endorse King of Prussia Rail...The King of Prussia Rail is a vital infrastructure project that cannot be ignored. The Philadelphia region needs to invest in this project to help reduce the burden of highway congestion that is choking our ability to grow jobs and encourage economic development.
245	Hearing	Support Gen		Schweiker	Mark	My perspective and formal role tonight is to represent our company, Renmatrix...In our mind, the King of Prussia Rail Project speaks to...our ability to recruit and hold onto talented people that we have here and to add more. So in that regard...we are hopeful that the project proceeds, because in our mind it's a very positive step at offering travel options and commuting options to would-be employees at Renmatrix and the many businesses that are found not too far from here...I want to tip my hat to SEPTA's leadership and designers, because going where we were two years ago and the line that was being contemplated with some negative impacts particularly on residents, there's less of that. So I do think that SEPTA should be given some acknowledgement and some praise for putting the proverbial ear to the ground and listening to some of those comments and observations and criticisms as to how a more -- as far as relying on a fair process and ultimately laying out a line with diminished impact particularly to the residents of the area.
246	Letter	Support Gen		Schweiker	Mark	...The King of Prussia Rail Project is an investment that will generate incredible returns - not just in terms of future socioeconomic performance, but also in making sure that this area remains a great place to live, visit and conduct business...

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Comment Number	Form	Topic	Organization/ Agency	Last	First	Comment
247	Hearing	Support Gen	Delaware Valley Regional Planning Commission	Seymour	Barry	...The King of Prussia Rail Project...was included in the DVRPC's very first long-range plan for the region, a plan developed back in 1969. Rail service to King of Prussia is also included in our newest long-range plan, Connections 2045, which our board adopted just last month. Under federal law, a plan needs to be fiscally constrained, which means the region must collectively set priorities and identify those projects that they wish to advance. The King of Prussia Rail Project is the only extension of new rail service in the Pennsylvania portion of our region, serving an area that has never had adequate transit service. The proposed project will connect one of Greater Philadelphia's most important job centers to the rest of the region and allow it to grow efficiently by attracting new development to the parts of King of Prussia that have the infrastructure to support it. The KOP Rail Project will better connect residents and workers in the King of Prussia area with each other and with destinations in their community, such as the KOP Mall, and provide new regional connectivity between the region's third largest employment and economic center here at King of Prussia with Center City and other communities. The project will take cars off the road, reduce congestion, and air pollution, and cut over 30 minutes from current rush hour transit travel times between King of Prussia and Center City, with much greater reliability than passengers experience today. In addition to our long-range plan, the DVRPC also worked closely with Montgomery County, SEPTA and Upper Merion to envision and plan for the stations that are well-connected with development and designed to carefully integrate the communities they serve.
248	Letter	Support Gen		Sheaffer	Andrew	...(LeCesse Development Corp is) writing in full support of the King of Prussia Rail project...As a native to the surrounding area, I could not be more delighted to hear of the continued efforts to extend the rail and provide more efficient and effective means of transportation to the area...
249	Website	Support Gen		Sheldon	Mary Ann	Better public transportation decreases pollution and increases the attractiveness of a city. I'm in favor of the K.of P. rail.
250	Hearing	Support Gen		Shipman	Jennifer	Having the King of Prussia Rail Line will modernize the city and open it up to an abundance of opportunity...It will bring new corporations that will fill our hotels, our restaurants, and retail stores, which will, in turn, create more opportunity for employment. We will be able to market to a deeper list of candidates, and capture those individuals who are unable to commute to King of Prussia or have to take multiple transit to get here. Having a rail line will help foster a sense of community...It will also significantly reduce our weekday commute. King of Prussia is growing so fast, and we may need a rail line to support all of the new developments. The King of Prussia Rail Line will make King of Prussia a much more viable option for social groups, corporate functions, and everyday leisure travelers. It brings us much closer to Philadelphia, and gives our employees and clients a much easier reason as to why they should choose King of Prussia.
251	Website	Support Gen		Sibley	Elisabeth	I support improved public transit options because transit improves accessibility and reduces traffic and its environmental impacts. However, I strongly urge you to choose a route alternative that does not place the rails close to any residence. It is unfair to burden a small number of people with the noise, loss of privacy, loss of property value, and other impacts that come with construction and with the presence of a railway line. I also wonder why the preferred route does not include access to the newly developed shopping area around Wegmans, and if it is not feasible to extend the rails that way, I hope Septa will consider incorporating a safe pedestrian route from the nearest station in the final project.
252	Hearing	Support Gen		Snyder	Leslie	...I am really in favor of the rail that would (help) clients and employees come out to King of Prussia.
253	Email	Support Gen		Spilis	Jennifer	...As a person is employed at a business in the King of Prussia region, I am writing to enthusiastically endorse King of Prussia Rail...King of Prussia Rail is a vital infrastructure project that can't be ignored. The Philadelphia region NEEDS to invest in this project to help reduce the burden of highway congestion that is choking our ability to grow jobs and encourage economic development. I endorse this project and encourage others to join me!

King of Prussia Rail Extension Project - Public Comments on the DEIS

Comment Number	Form	Topic	Organization/ Agency	Last	First	Comment
254	Letter	Support Gen		Stewart	Jeffrey	I am writing to enthusiastically endorse King of Prussia Rail...The King of Prussia Rail is a vital infrastructure project that cannot be ignored. The Philadelphia region needs to invest in this project to help reduce the burden of highway congestion that is choking our ability to grow jobs and encourage economic development.
255	Email	Support Gen		Sullivan	Charles, Toni	Hello! We are in support of the new rail line being proposed in King of Prussia.
256	Website	Support Gen		(no name given)	Susan	My husband and I are in full support of the KOP rail! It will most definitely cut down his travel time to work at Verizon in Chinatown. In addition to making it a more pleasurable commute! We also have family members contemplating on where to purchase housing while taking into consideration the commute to jobs in center city.
257	Hearing	Support Gen	Brandywine Realty Trust	Sweeney	Gerry	...The King of Prussia Rail Coalition believes that connecting King of Prussia to Center City and University City Philadelphia, via the Norristown High Speed Line, is a critically necessary project for our region to maintain its competitive advantage. The Coalition also believes that King of Prussia Rail will stimulate economic development in the region. In fact, for every dollar invested in public transportation, approximately \$4 is generated in economic benefits. Nationally, almost 50 percent of new commercial development is taking place in transit accessible submarkets. The Coalition further believes that the King of Prussia Rail Project will increase commercial real estate values, which will, in turn, increase municipal tax revenues. We also believe that the proposed rail project will connect employers to a broad pool of employees, and give residents easier access to jobs along the route...We also believe that the rail extension will increase property values along the line. The proposed stations will create in-market demand, walkable mixed use neighborhoods around the train stations. We also believe that the King of Prussia Rail Project is a transformative project that will increase regional mobility, reduce congestion, and save citizens valuable time and money...
258	Hearing	Support Gen		Sweeney	Mike	I'm in favor of the project...I see it as nothing but beneficial to the people throughout the region.
259	Website	Support Gen		Swenson	Greg	Yes! Please build this line! The area needs alternatives to a congested highway.
260	Letter	Support Gen		Tabb	Tyreake	I am writing to enthusiastically endorse King of Prussia Rail...The King of Prussia Rail is a vital infrastructure project that cannot be ignored. The Philadelphia region needs to invest in this project to help reduce the burden of highway congestion that is choking our ability to grow jobs and encourage economic development.
261	Letter	Support Gen		Tellez	Antonia	I am writing to enthusiastically endorse King of Prussia Rail...The King of Prussia Rail is a vital infrastructure project that cannot be ignored. The Philadelphia region needs to invest in this project to help reduce the burden of highway congestion that is choking our ability to grow jobs and encourage economic development.
262	Letter	Support Gen		Tellez	Juana	I am writing to enthusiastically endorse King of Prussia Rail...The King of Prussia Rail is a vital infrastructure project that cannot be ignored. The Philadelphia region needs to invest in this project to help reduce the burden of highway congestion that is choking our ability to grow jobs and encourage economic development.
263	Hearing	Support Gen		Tucker	Matt	...(Gladstone Commercial Corporation supports) the rail project because we believe it will provide better connectivity to housing and employment centers in the region,...decrease traffic congestion and provide alternative transit opportunities for people who live in the market and live outside the market who travel in for work. The investment in infrastructure will create jobs both through the construction process and in the future growth of King of Prussia...We've seen in markets around the country where you've got a suburban mall and suburban office parks that have not been continually invested in from an infrastructure standpoint, and a lot of those are in decline. It's important for King of Prussia to invest in transit infrastructure like this project to ensure its position as an edge city, as a source of growth for the region and a source of jobs and vitality. And I think if it doesn't happen, that's a big risk for the region.

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Comment Number	Form	Topic	Organization/ Agency	Last	First	Comment
264	Letter	Support Gen		Urias	Niquita	I am writing to enthusiastically endorse King of Prussia Rail...The King of Prussia Rail is a vital infrastructure project that cannot be ignored. The Philadelphia region needs to invest in this project to help reduce the burden of highway congestion that is choking our ability to grow jobs and encourage economic development.
265	Letter	Support Gen		Vacal	Maximo	I am writing to enthusiastically endorse King of Prussia Rail...The King of Prussia Rail is a vital infrastructure project that cannot be ignored. The Philadelphia region needs to invest in this project to help reduce the burden of highway congestion that is choking our ability to grow jobs and encourage economic development.
266	Email	Support Gen		Vassalotti	Marie	I support the King of Prussia railways plan.
267	Letter	Support Gen		Williams	Andrew	I am writing to enthusiastically endorse King of Prussia Rail...The King of Prussia Rail is a vital infrastructure project that cannot be ignored. The Philadelphia region needs to invest in this project to help reduce the burden of highway congestion that is choking our ability to grow jobs and encourage economic development.
268	Email	Support Gen		Witham	Barbara	I support this rail line. It would help alleviate car traffic and promote more business transactions though out the region. Bravo!
269	Email	Support Gen		Zdancewicz	Jim	As a member of the business community in the King of Prussia region, I am writing to enthusiastically endorse King of Prussia Rail. Our long-term business has transformed out of the former GSI web services company and continues to be a thriving creative entity producing digital content for some of the world's top ecommerce brands. This work is proudly created each day here in the heart of King of Prussia and supports hundreds of millions of dollars of online retail sales. Our staff is comprised of roughly 50% from the surrounding suburbs will nearly 50% form the city of Philadelphia. The proposed rail extension will provide much-needed relief from the daily driving commute for our staff. Our "City Dweller" staff has spent an average of two hours commuting each day by car for the past 15 years. In addition to current staff, the rail line opens up intern and apprenticeship possibilities to students from the various local and city colleges. Many of these eager young future employees simply don't have cars or rides to get here each day. While the construction and disruption from this type of infrastructure improvement always creates short-term hassles, the long-term benefits far outweigh those inconveniences. Besides the obvious economic benefits of short-term and long-term jobs, access to King of Prussia retail and entertainment for city residents who depend on public transportation, and new opportunities for new office, housing and retail projects, I believe we'll also all enjoy these additional benefits: · Reduced travel time and more travel options for commuters, consumers and residents. · Reduced congestion and traffic and environmental impact from gas and maintenance of vehicles. · Additional travel options for inclement weather as well as potential natural disasters that make roads impassible (blizzard, hurricane or act of terrorism). · Additional opportunities for access to jobs and cultural amenities for the greater Philadelphia area. King of Prussia Rail is a vital infrastructure project that opens up our many offerings for all to enjoy. This is really a "no-brainer" to help reduce the burden of highway congestion that limits our ability to grow jobs and encourage economic development. I endorse this project and encourage others to join me.
270	Website	Support Gen		Zovich	Beatrice	Please support the full extension of SEPTA rail service to KOP. This would ultimately benefit the economy and the environment.
271	Resolution	Support Gen	Norristown Municipal			...Now therefore be it resolved, that the Municipal Council of Norristown hereby endorses and fully supports the proposed SEPTA extension of the Norristown High Speed Line to the King of Prussia area...

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Comment Number	Form	Topic	Organization/ Agency	Last	First	Comment
272	Hearing	Support Gen	Bicycle Coalition of Greater Philadelphia	Boyle	John	I am research director for the Bicycle Coalition of Greater Philadelphia. I would like to offer our support for the expansion of the Route 100 to King of Prussia and Greater Valley Forge. Expanded high speed rail service will offer more opportunities for a connection to the circuit trails. In particular, we recommend that the proposed First and Moore/Convention Center Station just outside of Valley Forge National Historical Park includes safe bicycle and pedestrian connection to the Valley Forge Trail network. We also recommend that the Henderson Road Station be explicitly connected to the Chester Valley Trail. We encourage SEPTA to closely coordinate with the Montgomery County Planning Commission to assure that both stations create seamless connections with the Circuit Trails. The Environmental Impact Statement does not indicate whether or not the third track will be required between the existing high speed rail corridor, between 69th Street and Hughes Park. Portions of the unused right-of-way have been proposed for a possible rail-with-trail alignment for the Forge-to-Refuge Trail. We strongly encourage SEPTA to be open to allowing usage of the Route 100 right-of-way for a future rail-to-trail alignment for the Forge-to-Refuge Trail between Haverford and Radnor. The PECO/1st Ave. Action Alternative looks like it may share the right-of-way with the Chester Valley Trail along the Hanson Access Road. We request that the Final EIS specifically state that the future Chester Valley Trail Extension will not be negatively impacted by the construction of the rail line if this alternative is chosen. New rail cars need to include dedicated hanging bike racks similar to those installed on NJ TRANSIT's RiverLine, to safely secure bicycles. Even SEPTA's N-5 rail cars on the high speed rail line already have space for three or four bicycles in the rear vestibule. The Bicycle Coalition of Greater Philadelphia believes that carrying bikes on rush hour trains should not be an issue unless the vehicle is standing room only. Finally, at the 69th Street center, we would like to see a more direct platform access between the Norristown High Speed Line and the Market-Frankford Line. Even if an across-the-platform transfer cannot be installed initially, due to cost, it should be included as a future option, dependent on ridership demand. We also recommend that SEPTA improve upon the directional signage between the two lines for customers seeking to make this transfer. It is not easy to discern, especially for the first-time user.
273	Hearing	Support Gen		Cohen	Gary	I'm okay with the project that they are looking to produce at least in principle, but I feel they need to do a bit more on integrating into the neighborhood. I personally don't expect I will ever use it. I know other people will use it coming into this area....but I don't think it should negatively affect the neighborhood and, in particular, the traffic that we are already facing. So, my comment, I suppose, would be the integration of it on First Avenue. I feel that taking that from a four-lane road to a two-lane road to put an island in the middle is counterproductive for traffic flow.
274	Email	Support Gen		Cupo	Patrick	I implore the board to fully invest in this future KOP line to meet the increasing demand for public transportation from the KOP area. My wife currently drives to work as a nurse because the current SEPTA schedule is poorly timed and does not accommodate her needs to arrive on time and leave at an appropriate time. I am interested in activism and would be happy to learn more about the going-ons of this endeavor. I will be at the meeting Monday November 13th in support of the KOP rail. Thanks, A concerned resident of UM township.
275	Hearing	Traffic, noise, safety		McAndrew	Joan	One of the things that was mentioned was traffic congestion being decreased. Wouldn't we all want 202, 76, 276, even 476 to be not peak hours but at least not dipping hours where you just sit in traffic? I can't really foresee traffic decreasing. The best I could hope for is that it would remain the same; but we are going to be getting rid of the buses from my understanding, which helps air quality. If this area is a growing area, that usually means growing congestion, so I have concerns regarding this. But I was also an administrator for a business that ran 24/7, so I can see the positives from the standpoint of businesses. It makes a whole lot of sense and hopefully dollars for them. But also when running a business 24/7, the noise level, especially when you are talking about at night people going back and forth. And if this rail is in someone's back yard, it doesn't seem fair to them. We have a gem, the Valley Forge National Park. Why won't the line go that far? ...I grew up in Delaware County, hopped a bus as a teenager, went to 69th Street. I'm the oldest of 11. By the time my younger sister, who's 15 years younger than me, came along, it wasn't a good place to go by yourself. So we need increased support services: the police, the fire, EMTs, we need the sanitation. When I go through 69th Street now, it's like I'm afraid to touch anything. It scares me. Then there's safety issues. So what's going to happen with this over time?

*A*ppendix D

Table of Agency Comments Received on the DEIS

King of Prussia Rail Extension Project - Agency Comments on the DEIS and Responses to Agency Comments

Comment Number	Form	Topic	Organization/ Agency	Last	First	Title	Comment	Response
1	Email	NEPA	USEPA	Souto-Glyn	Rebecca	NEPA Reviewer	EPA has rated the project as Lack of Objections (LO), which indicates our review did not find any potential environmental impacts requiring substantive changes to the preferred alternative. A description of our rating system can be found at: https://www.epa.gov/nepa/environmental-impact-statement-rating-system-criteria .	SEPTA appreciates USEPA's rating for the project.
2	Email	Historic Resources	USEPA	Souto-Glyn	Rebecca	NEPA Reviewer	The September 26, 2016 PHMC eligibility concurrence memo is located in Appendix C and not Appendix B as stated on page 4-36.	The reference has been corrected in the FEIS.
3	Letter	Historic Resources	USEPA	Souto-Glyn	Rebecca	NEPA Reviewer	As the DEIS Section 106 consultation is on the recommended LPA (page 4-32), please describe how additional Section 106 consultation will proceed if the LPA is not the preferred alternative in the Final EIS.	SEPTA selected and adopted the recommended LPA and PA Turnpike North/South Option. Section 106 consultation will proceed to consider a revised Area of Potential Effects based on the PA Turnpike North/South Option and design refinements since the DEIS.
4	Letter	Historic Resources	USEPA	Souto-Glyn	Rebecca	NEPA Reviewer	EPA recommends quantifying potential impacts to "a similar sliver of land from the historic property alongside the edge of 1st Avenue"(page 4-43) for the PECO-1st Ave. and US 202-1st Ave. Action Alternatives and recommended LPA design options, as well as those discussed on pages 4-41 to 4-44, Recommended LPA. Presenting these impacts in a format similar to Table 5-3-2 would be useful.	Since the DEIS, SEPTA selected and adopted the recommended LPA and made refinements to the LPA to reduce or eliminate Project impacts. Along First Avenue, the guideway has been shifted to the north side of First Avenue, on the opposite side of the roadway from the historic American Baptist Churches U.S.A. Mission Center. By shifting the Preferred Alternative guideway to the north, SEPTA will avoid impacting the historic property. If, during the DEIS, this refinement had been made for the alternatives aligned along First Avenue, none of those alternatives would impact the American Baptist Churches U.S.A. Mission Center. See Master Response 4B regarding the minimization of impacts through the inclusion of the PA Turnpike North/South Option.
5	Email	Historic Resources	USEPA	Souto-Glyn	Rebecca	NEPA Reviewer	It would be helpful to include the 2016 KOP Rail Intensive-Level Survey and Eligibility Report and 2017 KOP Rail Determination of Effects Report, referenced on page 5-5, in the Appendices for review.	AECOM's 2016 KOP Rail Intensive-Level Survey and Eligibility Report may be accessed from the Project website, www.kingofprussiarail.com by clicking on the link for "Section 106 Determination of Eligibility Report." AECOM's 2017 KOP Rail Determination of Effects Report may be accessed from the Project website, www.kingofprussiarail.com by clicking on the link "Section 106 Determination of Effects Report."

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Comment Number	Form	Topic	Organization/ Agency	Last	First	Title	Comment	Response
6	Email	Air Quality	USEPA	Souto-Glyn	Rebecca	NEPA Reviewer	On page 4-57, EPA recommends clarifying that Montgomery County is part of the Philadelphia-Wilmington-Atlantic City, PA-NJ-MD-DE marginal nonattainment area for the 2008 ozone NAAQS and part of the Philadelphia-Wilmington, PA-NJ-DE maintenance area for the 2006 PM2.5 NAAQS and therefore, recommends editing page 4-57 as follows, to note the requirement to comply with the Transportation Conformity Rule for both O3 and PM2.5: "However, because of the County's status designation as marginal nonattainment for the 2008 ozone NAAQS O3 and maintenance for the 2006 PM2.5 NAAQS, TCR compliance is applicable to the Project must comply with air quality conformity requirements for O3 and PM2.5."	USEPA's recommended language has been included in the FEIS, Section 4.9.
7	Email	Air Quality	USEPA	Souto-Glyn	Rebecca	NEPA Reviewer	On pages 4-57 and 4-59, EPA recommends either clarifying that in accordance with 40 CFR 93.123, the Project is not a Project of air quality concern warranting a hot-spot analysis for PM2.5 or removing the sentence that references 40 CFR 93.123. 40 CFR 93.123 applies to the hot-spot analysis for PM2.5, which is explained in more detail on page 4-58. EPA suggests minor edits to 4-57 as follows: "In accordance with 40 CFR 93.123, the Project would use electric-powered vehicles, and as such would not be a project of concern warranting a hot-spot analysis for PM2.5 for air quality. "	USEPA's recommended language has been included in the FEIS, Section 4.9.
8	Email	Air Quality	USEPA	Souto-Glyn	Rebecca	NEPA Reviewer	EPA suggests editing page 4-59 as follows: "Therefore, the Project is not a project of air quality concern (POAQC) warranting a hot-spot analysis for PM2.5."	USEPA's recommended language has been included in the FEIS, Section 4.9.
9	Email	Air Quality	USEPA	Souto-Glyn	Rebecca	NEPA Reviewer	On page 4-60, EPA recommends including the citation 23 CFR 93.126 for the "projects qualifying as categorical exclusions" category of exempt projects or projects with no meaningful potential MSAT impacts.	USEPA's recommended citation has been included in the FEIS, Section 4.9.
10	Letter	Air Quality	USEPA	Souto-Glyn	Rebecca	NEPA Reviewer	It is unclear from the plan documentation if potential short-term impacts from construction-related emissions are captured in the transportation conformity review of the project, in accordance with the EPA general conformity regulations (40 CFR Part 93 Subpart B).	Please see FEIS Section 4.9 Air Quality.
11	Letter	Air Quality	USEPA	Souto-Glyn	Rebecca	NEPA Reviewer	Footnote 4 on page 4-56 notes that neither the Transportation Conformity Rule (TCR) nor NEPA regulations require analysis of mobile source air toxics (MSATs). However, EPA recommends conducting an MSAT analysis to capture anticipated changes in emissions within the affected environment of the proposed project.	Comment noted. Please see FEIS Section 4.9 Air Quality.

King of Prussia Rail Extension Project - Agency Comments on the DEIS and Responses to Agency Comments

Comment Number	Form	Topic	Organization/ Agency	Last	First	Title	Comment	Response
12	Email	NEPA	USEPA	Souto-Glyn	Rebecca	NEPA Reviewer	As noted in our Technical Comments in reference to Section 7.2.2 of the DEIS, EPA would like to continue to participate in the project's environmental review as a cooperating agency. At your earliest convenience, please let us know your availability to schedule a phone conference to discuss.	FTA appreciates the USEPA's comment to be a cooperating agency for the Project. As the FEIS is completed, FTA will not be inviting agencies to be cooperating agencies.
13	Letter	Bicycle/ Pedestrian/ car share	USEPA	Souto-Glyn	Rebecca	NEPA Reviewer	On pages ES-13 and 3-20, the DEIS proposes new multi-use paths and shuttle service to connect proposed stations to key destinations, such as King of Prussia Mall, King of Prussia Business Park, Children's Hospital, and Valley Forge National Historic Park (VFNHP). EPA recommends coordinating with local stakeholders to provide direct multi-use paths that connect proposed stations to these key destinations, as well as to the Schuylkill River and Chester Valley Trails, and not rely on shuttle service alone. EPA recommends coordinating locally to provide a direct multi-use path that connects the proposed King of Prussia Casino and Resort station to VFNHP, providing safe crossings of high traffic roadways where necessary. In addition, EPA recommends assessing the feasibility of siting bicycle and car share facilities at proposed stations.	FEIS Section 3.3.3 includes a commitment that, as the Project moves forward, SEPTA will work with PennDOT, the county, and the township to accommodate pedestrian and bicycle connections to proposed stations. See Master Responses 6B through 6D and 6F through 6K regarding the continued coordination between SEPTA, Upper Merion Township and other area planning partners. See Master Response 2D regarding the Chester Valley Trail Extension.
14	Letter	Water Quality/ Stormwater Management	USEPA	Souto-Glyn	Rebecca	NEPA Reviewer	To address an increase in impervious surface areas from the project, EPA supports the proposal on Chapter 4, page 4-87 to incorporate green infrastructure (rain gardens, riparian stream buffers, vegetative swales, green roofs, and porous pavement) where appropriate into the stormwater management plan. EPA acknowledges the feasibility of installing certain green infrastructure features may be limited by the karst formation underlying portions of the project. Stormwater management facilities should not be placed in wetlands or other aquatic habitats.	Since the DEIS, SEPTA has refined the design of the Preferred Alternative to include preliminary locations for stormwater management facilities. In Section 4.11, and as the Project moves forward, SEPTA commits to coordinate with the Pennsylvania Department of Protection and the US Army Corps of Engineers as further design of the Project stormwater management plan occurs. At that time, SEPTA will evaluate the feasibility and reasonableness of applying water quality infrastructure and best management practices.
15	Letter	Construction	USEPA	Souto-Glyn	Rebecca	NEPA Reviewer	EPA recommends coordinating with local governments and emergency services to develop a response management plan for potential accidental release of contaminated materials and hazardous waste that may be uncovered or created during construction. Special consideration should be given to areas in close proximity of waterways and other at-risk areas.	As described in FEIS Section 4.12, SEPTA will develop and implement a construction plan that includes Health and Safety Plan. The Health and Safety Plan will include a response management plan for use in the event of an accidental release of contamination or hazardous materials during Project construction. The response management plan will also outline procedures to be undertaken if existing contamination or hazardous materials are encountered during construction activities. See Master Response 8B regarding the development and planning to establish protocols for construction activities in areas where potential or known contaminated materials and hazardous waste exist.

King of Prussia Rail Extension Project - Agency Comments on the DEIS and Responses to Agency Comments

Comment Number	Form	Topic	Organization/ Agency	Last	First	Title	Comment	Response
16	Letter	Contamination	USEPA	Souto-Glyn	Rebecca	NEPA Reviewer	Two known sites under cleanup in the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA, aka Superfund) program are identified within or near the proposed alignments, at Henderson Road and 103 Queens Drive. We recommend the Final study include a coordination plan with Pennsylvania Department of Environmental Protection and EPA Region III CERCLA project managers. EPA would be pleased to discuss in more detail.	In FEIS Section 4.12, SEPTA commits to developing and implementing a coordination plan with the Pennsylvania Department of Environmental Protection and EPA Region III CERCLA project managers in regard to the Project in relation to the two CERCLA sites in the Project area. See Master Response 8A regarding water quality concerns and the coordination plan for addressing the CERCLA sites.
17	Letter	Environmental Justice	USEPA	Souto-Glyn	Rebecca	NEPA Reviewer	EPA recommends strengthening the Environmental Justice assessment by adding a column on Table 4- 14.1 with the combined percentages of Minority – non-Hispanic and Minority - Hispanic populations, to give the perspective of the total minority population. Please note the Federal definition of a minority population.	This recommended addition has been made in Chapter 4.14.
18	Letter	Environmental Justice	USEPA	Souto-Glyn	Rebecca	NEPA Reviewer	Further analysis may be needed to determine the potential for localized project-related adverse impacts or benefits to minority and/or low-income populations. It is not reasonable to assume that all adverse impacts or benefits will be shared by all.	The assessment in the FEIS considers the potential for localized project-related benefits and impacts of the Preferred Alternative to EJ communities. Please see FEIS Section 4.14 Environmental Justice.
19	Letter	Visual	USEPA	Souto-Glyn	Rebecca	NEPA Reviewer	EPA recommends quantifying the number of residences with potential visual and aesthetic impacts from the Action Alternatives and Recommended LPA, as described in Section 4.8 (for VAU 1 , VAU 3, VAU 5, VAU 6, and VAU 7).	See Master Response 10A regarding visual impacts for residential properties.
20	Letter	Visual	USEPA	Souto-Glyn	Rebecca	NEPA Reviewer	EPA recommends quantifying the number of residences with significant visual impact (as shown in Figure 4-8.10) and potential mitigation measures.	See Master Response 10A regarding visual impacts for residential properties.
21	Letter	Visual	USEPA	Souto-Glyn	Rebecca	NEPA Reviewer	Figure 4-8.11 shows less significant visual impact, though this depiction could be more realistic if rendered after leaves have fallen from deciduous trees.	Please see Figure 4.8-10 in the FEIS.
22	Letter	Property Acquisition	USEPA	Souto-Glyn	Rebecca	NEPA Reviewer	Please explain what is meant by 24 partial and 4 full residential acquisitions under "Impact Magnitude" in Table 5-5.1, under PECO/TP- 1st Ave.	FEIS Section 4.5 provides a clearer explanation of partial and full acquisition terms.
23	Letter	Design Refinement/ Minimization	USEPA	Souto-Glyn	Rebecca	NEPA Reviewer	EPA recommends during location selection and design of the alignment and ancillary facilities (including stations, pedestrian and bicycle, stormwater management , etc.) continued investigation of ways to avoid or minimize impacts to the natural and built environment , such as to wetlands and other aquatic resources, historic, cultural, and archaeological resources, and potential noise and visual impacts of the proposed project.	FEIS Chapter 2 describes the design refinements made by SEPTA since the DEIS to avoid or reduce impacts to the natural and human environment. See FEIS Chapter 4 for a summary of SEPTA's minimization and mitigation commitments.

King of Prussia Rail Extension Project - Agency Comments on the DEIS and Responses to Agency Comments

Comment Number	Form	Topic	Organization/ Agency	Last	First	Title	Comment	Response
24	Letter	Firehouse/ 9/11 Memorial	USEPA	Souto-Glyn	Rebecca	NEPA Reviewer	EPA suggests the Final EIS provide additional information on potential relocation sites for the King of Prussia Volunteer Fire Company under the 9/11 Memorial Avoidance Option for the recommended LPA.	FEIS Section 2.3.2.8 discusses relocation of the firehouse and 9/11 Memorial. In this section, SEPTA commits as part of the Project to address impacts to the King of Prussia Volunteer Fire Company and 9/11 Memorial by undertaking the following activities: continue coordinating with the Upper Merion Township Department of Public Safety and the King of Prussia Volunteer Fire Company regarding relocation of the fire company facility and 9/11 Memorial; and, provide funding as part of the Project for the relocation of the fire company facility and 9/11 Memorial. See Master Response 11A and 11B regarding relocation/mitigation of the firehouse and 9/11 Memorial.
25	Letter	Valley Forge National Historical Park	DOI-OEPC	Nelson	Lindy	Regional Environmental Officer	The Department understands that the National Park Service (NPS), Valley Forge National Historical Park (Park) has been involved in reviewing the project from the early stages and anticipates no adverse effects to the Park. Although the terminal may be minimally visible from the Park, it is already surrounded by existing mid-rise and high rise office buildings, hotels, and a casino. As described, NPS does not anticipate the project will add cumulative impact to the existing Park viewshed. NPS anticipates that the project may alleviate traffic congestion, possibly decreasing related impacts to Park resources. Completion of the project, with its terminal near the Park, may increase accessibility by providing another transportation alternative, particularly for visitors or staff without access to personal vehicles.	SEPTA appreciates USEPA's agreement with regard to the potential benefits of the Project to Valley Forge National Historical Park. FEIS Section 3.3 includes a commitment that, as the Project moves forward, SEPTA will support planning efforts by PennDOT, Montgomery County and Upper Merion Township in planning efforts to provide bicycle and pedestrian connections between destinations, such as the park, and proposed stations. See Master Responses 6B through 6D, and 6F through 6K regarding the continued coordination between SEPTA, Upper Merion Township, and other area planning partners.

King of Prussia Rail Extension Project - Agency Comments on the DEIS and Responses to Agency Comments

Comment Number	Form	Topic	Organization/ Agency	Last	First	Title	Comment	Response
26	Letter	Section 4(f)	DOI-OEPC	Nelson	Lindy	Regional Environmental Officer	The Department has reviewed the draft Section 4(f) Evaluation provided and commends the amount of effort that the Federal Transit Administration and its partners have put into researching potential alternatives and working with other agencies in determining which alternative would least impact 4(f) properties. The Department agrees that the preferred alternative PEPCO/TP-1st Ave. appears to have the least impact on the twelve (12) Section 4(f) properties identified, with only two de minimis uses identified for the American Baptist Churches, USA Mission Center and the Philadelphia and Western Railway. The Department recognizes that the Pennsylvania SHPO has concurred with a determination of No Adverse Effect for this alternative. The Department understands that there are potential options and alternatives that may be incorporated into the project that have not yet had formal determinations made, however the Department agrees that the two options under consideration are also likely to have no adverse effect on 4(f) properties. The Department will delay providing formal concurrence until the final Section 4(f) determination is received.	FTA and SEPTA appreciate the DOI's recognizing the rigor of the Draft Section 4(f) Evaluation. The Final Section 4(f) Evaluation is a Technical Memorandum that supports the FEIS and may be found on the Project website, www.kingofprussiarail.com . The evaluation examines potential impacts of the Preferred Alternative, which includes the PA Turnpike North/South Option and design refinements since the DEIS. Refinement to the guideway design along First Avenue eliminated Project impact to the American Baptist Churches, USA Mission Center. The Final Section 4(f) Evaluation includes a permanent use finding for the PNJ Interconnection property, a de minimis impact finding for the Philadelphia and Western Railway, an avoidance analysis, an analysis of the alternative with the least harm, documentation of all possible planning to minimize harm, and documents coordination activities undertaken during the evaluation.
27	Letter	Threatened and Endangered Species	USFWS			Pennsylvania Field Office	We have already provided comments on this project (see PNDI receipt); therefore, no further correspondence will be sent by this agency. If there is a change in the project, please re-screen the project on-line, and contact this office.	SEPTA updated the PNDI for the Project during the FEIS. See FEIS Section 4.11 regarding the PNDI.

*A*ppendix D
Agency Letters



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

November 27, 2017

Ms. Elizabeth Smith, Project Manager
Southeastern Pennsylvania Transportation Authority (SEPTA)
2001 Market Street, 10th Floor (ATTN: ECW)
Philadelphia, PA 19103

Mr. Daniel Koenig, Environmental Protection Specialist
U.S. Federal Transit Administration (FTA), Region III
1760 Market Street, Suite 500
Philadelphia, PA 19103-4124

Re: King of Prussia Rail Project, Draft Environmental Impact Statement (DEIS), Montgomery County, Pennsylvania, October 2017 CEQ No. 20170200

Dear Ms. Smith and Mr. Koenig:

In accordance with the National Environmental Policy Act (NEPA), Section 309 of the Clean Air Act, and the Council on Environmental Quality (CEQ) regulations 40 CFR Parts 1500-1508, the U.S. Environmental Protection Agency (EPA) reviewed the Draft Environmental Impact Statement (DEIS) for the King of Prussia Rail Project located in Montgomery County, Pennsylvania. The DEIS assesses the environmental impacts of five action alternatives, including the recommended Locally Preferred Alternative (LPA) and a no action alternative, to extend the Norristown High Speed Line rail service four miles to the King of Prussia Mall and other destinations in the King of Prussia-Valley Forge area of Upper Merion Township. The proposed action alternatives address the need for faster, more reliable public transit service to, from, and within the King of Prussia-Valley Forge area and include the construction of five to seven new stations and two park-and-ride facilities with multi-modal access to existing bicycle and pedestrian facilities.

EPA has rated the King of Prussia Rail Project DEIS as Lack of Objections (LO). The LO rating means our review did not identify any potential environmental impacts requiring substantive changes to the preferred alternative. A description of our rating system can be found at: <https://www.epa.gov/nepa/environmental-impact-statement-rating-system-criteria>. Some general comments for your consideration on the DEIS are provided in the enclosed Technical Comments.

As noted in our Technical Comments, EPA would like to continue participating in the project's environmental review and provide input at key decision points as a cooperating agency.



Thank you for the opportunity to review this project. If you have questions regarding these comments, the staff contact for this project is Rebecca Souto-Glyn, who can be reached at 215-814-2795 or Glyn.Rebecca@epa.gov.

Sincerely,



Barbara Rudnick
NEPA Review Coordinator
Office of Environmental Programs

Enclosure: Technical Comments on the Draft Environmental Impact Statement, SEPTA King of Prussia Rail Project



*Printed on 100% recycled/recyclable paper with 100% post-consumer fiber and process chlorine free.
Customer Service Hotline: 1-800-438-2474*

Technical Comments on the Draft Environmental Impact Statement SEPTA King of Prussia Rail Project

1. Pedestrian and Bicycle Facilities

On pages ES-13 and 3-20, the DEIS proposes new multi-use paths and shuttle service to connect proposed stations to key destinations, such as King of Prussia Mall, King of Prussia Business Park, Children's Hospital, and Valley Forge National Historic Park (VFNHP). EPA recommends coordinating with local stakeholders to provide direct multi-use paths that connect proposed stations to these key destinations, as well as to the Schuylkill River and Chester Valley Trails, and not rely on shuttle service alone. EPA recommends coordinating locally to provide a direct multi-use path that connects the proposed King of Prussia Casino and Resort station to VFNHP, providing safe crossings of high traffic roadways where necessary. In addition, EPA recommends assessing the feasibility of siting bicycle and car share facilities at proposed stations.

2. Stormwater Management

To address an increase in impervious surface areas from the project, EPA supports the proposal on Chapter 4, page 4-87 to incorporate green infrastructure (rain gardens, riparian stream buffers, vegetative swales, green roofs, and porous pavement) where appropriate into the stormwater management plan. EPA acknowledges the feasibility of installing certain green infrastructure features may be limited by the karst formation underlying portions of the project. Stormwater management facilities should not be placed in wetlands or other aquatic habitats.

3. Hazardous Waste

EPA recommends coordinating with local governments and emergency services to develop a response management plan for potential accidental release of contaminated materials and hazardous waste that may be uncovered or created during construction. Special consideration should be given to areas in close proximity of waterways and other at-risk areas.

Two known sites under cleanup in the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA, aka Superfund) program are identified within or near the proposed alignments, at Henderson Road and 103 Queens Drive. We recommend the Final study include a coordination plan with Pennsylvania Department of Environmental Protection and EPA Region III CERCLA project managers. EPA would be pleased to discuss in more detail.

4. Air Quality and Greenhouse Gases

4.9.1.1 Conformity

Footnote 4 on page 4-56 notes that neither the Transportation Conformity Rule (TCR) nor NEPA regulations require analysis of mobile source air toxics (MSATs). However, EPA recommends conducting an MSAT analysis to capture anticipated changes in emissions within the affected environment of the proposed project.

4.9.3.2 Action Alternatives

It is unclear from the plan documentation if potential short-term impacts from construction-related emissions are captured in the transportation conformity review of the project, in accordance with the EPA general conformity regulations (40 CFR Part 93 Subpart B).



5. Environmental Justice

- a. EPA recommends strengthening the Environmental Justice assessment by adding a column on Table 4-14.1 with the combined percentages of Minority – non Hispanic and Minority – Hispanic populations, to give the perspective of the total minority population. Please note the Federal definition of a minority population.
- b. Further analysis may be needed to determine the potential for localized project-related adverse impacts or benefits to minority and/or low income populations. It is not reasonable to assume that all adverse impacts or benefits will be shared by all.

6. Historic and Archaeological Resources

- a. As the DEIS Section 106 consultation is on the recommended LPA (page 4-32), please describe how additional Section 106 consultation will proceed if the LPA is not the preferred alternative in the Final EIS.
- b. EPA recommends quantifying potential impacts to “a similar sliver of land from the historic property alongside the edge of 1st Avenue” (page 4-43) for the PECO-1st Ave. and US 202-1st Ave. Action Alternatives and recommended LPA design options, as well as those discussed on pages 4-41 to 4-44, Recommended LPA. Presenting these impacts in a format similar to Table 5-3-2 would be useful.
- c. EPA recommends quantifying the number of residences with potential visual and aesthetic impacts from the Action Alternatives and Recommended LPA, as described in Section 4.8 (for VAU 1, VAU 3, VAU 5, VAU 6, and VAU 7).
- d. EPA recommends quantifying the number of residences with significant visual impact (as shown in Figure 4-8.10) and potential mitigation measures.
- e. Figure 4-8.11 shows less significant visual impact, though this depiction could be more realistic if rendered after leaves have fallen from deciduous trees.
- f. It would be helpful to include the 2016 *KOP Rail Intensive-Level Survey and Eligibility Report* and 2017 *KOP Rail Determination of Effects Report*, referenced on page 5-5, in the Appendices for review.
- g. Please explain what is meant by 24 partial and 4 full residential acquisitions under “Impact Magnitude” in Table 5-5.1, under PECO/TP-1st Ave.

7. General Comments

- a. EPA recommends during location selection and design of the alignment and ancillary facilities (including stations, pedestrian and bicycle, stormwater management, etc.) continued investigation of ways to avoid or minimize impacts to the natural and built environment, such as to wetlands and other aquatic resources, historic, cultural, and archaeological resources, and potential noise and visual impacts of the proposed project.
- b. EPA suggests the Final EIS provide additional information on potential relocation sites for the King of Prussia Volunteer Fire Company under the 9/11 Memorial Avoidance Option for the recommended LPA.
- c. Per DEIS Section 7.2.2, EPA affirms our interest in continuing to participate in the project’s environmental review and provide input at key decision points as a cooperating agency.





IN REPLY REFER TO:

United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
Custom House, Room 244
200 Chestnut Street
Philadelphia, Pennsylvania 19106-2904

November 30, 2017

9043.1
ER 17/0482

Daniel Koenig
Environmental Protection Specialist, Region III
US Department of Transportation—Federal Transit Administration
1200 New Jersey Avenue, SE
East Building E56-202
Washington, DC 20590

Subject: Draft Environmental Impact Statement and Section 4(f) Evaluation for the King of Prussia Rail Project, Montgomery, County, PA.

Dear Mr. Koenig:

The Department of the Interior (Department) has reviewed the Draft Environmental Impact Statement and Draft Section 4(f) Evaluation (DEIS) for the proposed King of Prussia Rail Project in Upper Merion Township, Montgomery County, Pennsylvania. The purpose of the proposed project is to provide faster, more reliable public transit service to the King of Prussia area 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 King of Prussia area; and
- Better serves existing transit riders and accommodates new transit patrons.

The Department offers the following comments on this project for your consideration.

DEIS Comments

The Department understands that the National Park Service (NPS), Valley Forge National Historical Park (Park) has been involved in reviewing the project from the early stages and anticipates no adverse effects to the Park. Although the terminal may be minimally visible from the Park, it is already surrounded by existing mid-rise and high rise office buildings, hotels, and a casino. As described, NPS does not anticipate the project will add cumulative impact to the existing Park viewshed. NPS anticipates that the project may alleviate traffic congestion,

possibly decreasing related impacts to Park resources. Completion of the project, with its terminal near the Park, may increase accessibility by providing another transportation alternative, particularly for visitors or staff without access to personal vehicles.

Section 4(f) Evaluation Comments

The Department has reviewed the draft Section 4(f) Evaluation provided and commends the amount of effort that the Federal Transit Administration and its partners have put into researching potential alternatives and working with other agencies in determining which alternative would least impact 4(f) properties. The Department agrees that the preferred alternative PEPCO/TP-1st Ave. appears to have the least impact on the twelve (12) Section 4(f) properties identified, with only two *de minimis* uses identified for the American Baptist Churches, USA Mission Center and the Philadelphia and Western Railway. The Department recognizes that the Pennsylvania SHPO has concurred with a determination of No Adverse Effect for this alternative. The Department understands that there are potential options and alternatives that may be incorporated into the project that have not yet had formal determinations made, however the Department agrees that the two options under consideration are also likely to have no adverse effect on 4(f) properties. The Department will delay providing formal concurrence until the final Section 4(f) determination is received.

We appreciate the opportunity to provide these comments.

Sincerely,

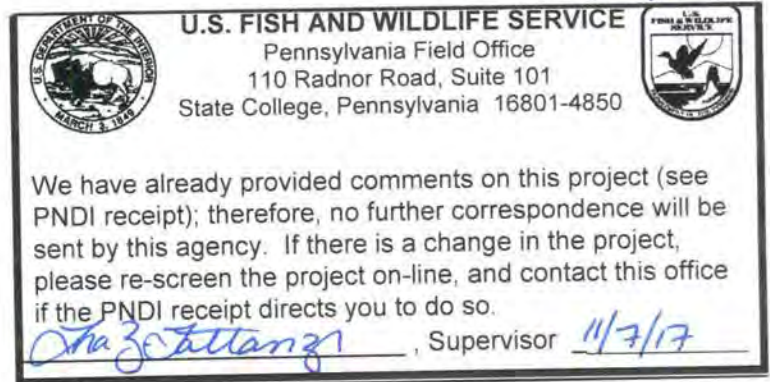
A handwritten signature in black ink, appearing to read 'Lindy Nelson', with a stylized flourish at the end.

Lindy Nelson
Regional Environmental Officer

cc: SHPO-PA James Vaughan (jvaughan@pa.gov)
Daniel Koenig (daniel.koenig@dot.gov)
Project Website (info@koprail.com)

October 13, 2017

Ms. Lora Lattanzi
Supervisor
US Department of the Interior, Fish & Wildlife Service
110 Radnor Road
Suite 101
State College, PA 16801



Re: King of Prussia Rail - Draft Environmental Impact Statement
Upper Merion Township, Montgomery County, PA

Dear Ms. Lattanzi:

The Southeastern Pennsylvania Transportation Authority (SEPTA) is pleased to provide for your review the Executive Summary of the **Draft Environmental Impact Statement (DEIS)** for the King of Prussia Rail (KOP Rail) project in Upper Merion Township, Montgomery County, Pennsylvania. The DEIS is a product of collaboration between SEPTA, the Federal Transit Administration (FTA) as the lead Federal agency, elected officials, state and local agencies, and stakeholders. The DEIS summarizes the transportation and environmental effects of **extending Norristown High Speed Line service to the King of Prussia-Valley Forge area of Upper Merion, a distance of approximately 4.4 miles.** In addition to the printed Executive Summary, this package includes one flash drive that holds the complete DEIS document.

The DEIS includes the purpose and need for the project, alternatives considered, identification of a recommended Locally Preferred Alternative, and transportation and environmental effects for building and operating the KOP Rail project. Information in the DEIS has been presented to the public over the past four years as part of ongoing public outreach efforts for the project.

As part of SEPTA's commitment to public involvement and in accordance with federal requirements including the National Environmental Policy Act, SEPTA has made the DEIS available for public comment through December 4, 2017. The document has been distributed to federal, state, county and local government agencies and interested stakeholders in the project area. The DEIS is available for public review at the libraries listed below and online at www.kingofprussiarail.com.

- Upper Merion Township Library, 175 West Valley Forge Road, King of Prussia
- Montgomery County-Norristown Public Library, 1001 Powell Street, Norristown
- Upper Darby Township Free Public Library, 501 Bywood Avenue, Upper Darby

*A*ppendix D

Public Hearing Summary Report



King of Prussia Rail Project
Draft Environmental Impact Statement
DRAFT DEIS PUBLIC COMMENT PERIOD SUMMARY REPORT

Prepared for:
Southeastern Pennsylvania Transportation Authority (SEPTA)



Prepared by:
AECOM Technical Services, Inc.
Philadelphia, PA

January 2018

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1 INTRODUCTION

The Southeastern Pennsylvania Transportation Authority (SEPTA), in cooperation with the Federal Transit Administration (FTA), prepared and published a Draft Environmental Impact Statement (DEIS) and Section 4(f) Evaluation for the King of Prussia Rail Project (Project) in Upper Merion Township, Montgomery County, PA. The DEIS was subject to a 53-day comment period during which the public, stakeholders and agencies were invited to review the DEIS and provide written and verbal comments. The DEIS public comment period complied with the requirements codified by the USDOT in 23 C.F.R. Parts 771.123(g) and (h).

This DEIS Public Comment Period Summary Report documents the comments received during that period (Section 2) and reports next steps for the Project (Section 3). Appendices contain the following information:

- Public, stakeholder and agency comments (Appendices A through E);
- Overview of the DEIS public comment period, including the methods by which comments could be provided and how FTA and SEPTA will use the comments in Project decision-making (Appendix F); and
- Description of the NEPA process and the Project (Appendix G).

2 SUMMARY OF DEIS PUBLIC COMMENT PERIOD COMMENTS

This summary organizes DEIS public comment period comments into two groups: a public group consisting of the public and stakeholders, and an agency group. The DEIS public comment period generated comments from the public and stakeholders using the methods summarized in Table 2-1. A total of 279 public comments were provided by 216 public commenters (Section 2.1). In addition to public comments, SEPTA received two resolutions of support (Section 2.2), 53 letters of support (Section 2.3), two public petitions (Section 2.4), and 24 comments by letter or email from three agencies (Section 2.5).

Table 2-1 Summary of Methods by Which Public Comments Were Provided

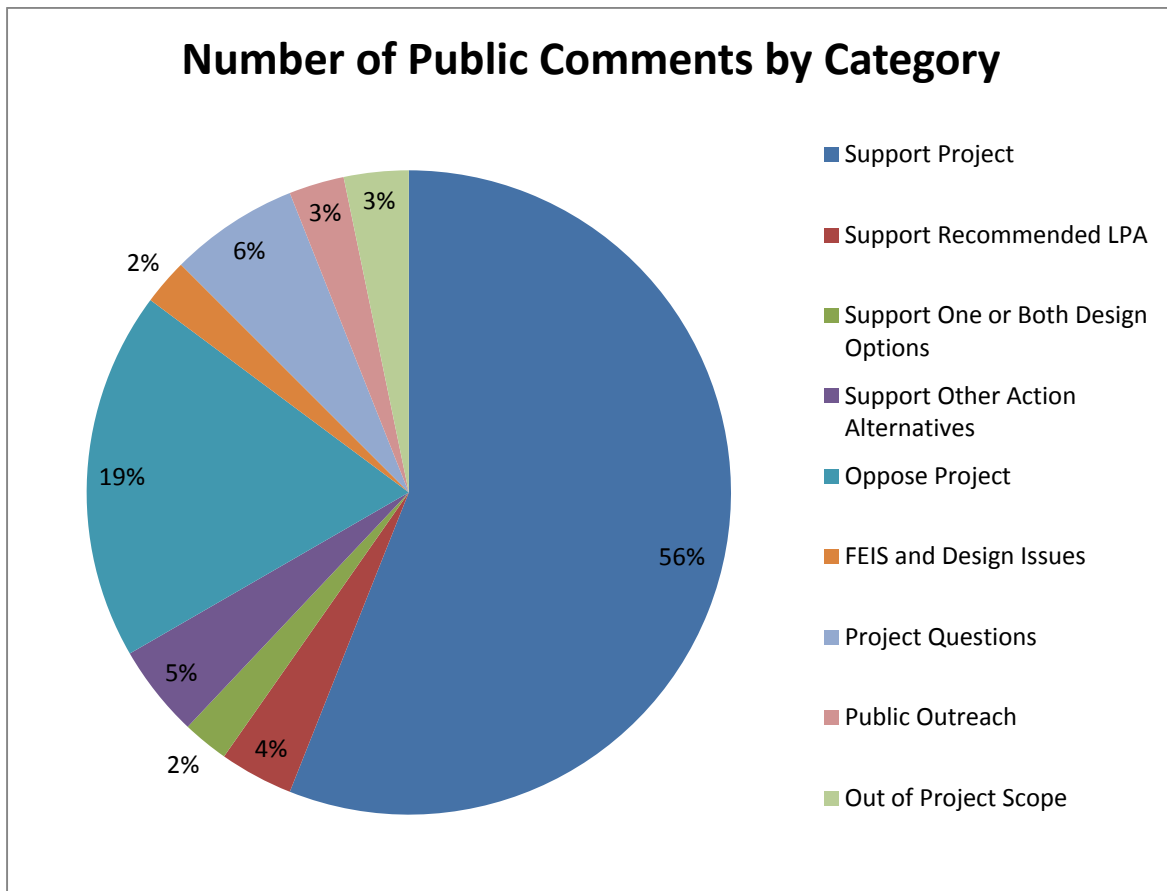
Public Comment Method	Number of Comments
Email and Project Website Comments	130
Regular Mail	57
November 13, 2017 Public Hearing Testimony	48
November 13, 2017 Private Testimony	9
November 15, 2017 Public Hearing Testimony	16
November 15, 2017 Private Testimony	1
Comment Cards	18
Total Number of Public Comments	279

2.1 Public and Stakeholder Comments

The public includes the general public, private businesses, private railroads, governmental and non-governmental organizations and various interest and advocacy groups. Appendix A provides a log of public comments received during the DEIS public comment period by email, the Project website, public hearing testimony, comment cards and letters. The public comments are organized into seven broad categories: Support Project; Support an Alternative or Design Option; Oppose Project; FEIS and Design Issues; Project Questions; Public Outreach; and Outside of Project Scope.

Of the 216 public and stakeholder commenters, 121 support the Project (56%), with an additional eight comments that specifically support the recommended LPA (4%) and five that support one or both recommended LPA design options (2%). Ten public comments were received supporting Action Alternatives that would use US Route 202 and/or would have a station along N. Gulph Road to serve the Village at Valley Forge (5%).

Among the comments made, 40 do not support the Project (19%). Five comments indicated no preference among the Action Alternatives and recommended LPA design options (2%), but indicated the need for further consideration of specific issues or concerns as the Project advances (such as the need to coordinate with the PA Turnpike and Aqua Pennsylvania). Fourteen comments asked questions about the Project (6%), but did not provide an opinion about the Project or the alternatives and design options. Six comments related to the public outreach process (3%) and another seven comments discussed issues that are outside the Project scope (such as the condition of Route 422) (3%). The distribution of public comments received during the DEIS public comment period is shown graphically in Figure 2-1.

Figure 2-1: Public Comments by Category

To better understand the public comments and to assist SEPTA in selecting an LPA, the broad categories of comments were further organized by topic. For example, a commenter stated an opinion that the Project would reduce commuter travel time. This comment is organized under the broad category “Support Project” and the topic within that category “Will address transportation needs.” Listed below are comments organized by broad categories and subtopics.

- **Support Project**
 - Will address transportation needs
 - Will add capacity to the transportation system that is now crowded
 - Will reduce travel times experienced on existing buses and during driving; gained time will increase personal productivity
 - Will simplify commuter travel from Philadelphia to King of Prussia and vice versa
 - Will provide a reliable transportation option
 - Will improve access to and within the King of Prussia area for residents and visitors
 - Need rail service to King of Prussia Mall and City of Philadelphia

- Will take people to the places they most want to go (the King of Prussia Mall including its office component, the King of Prussia Business Park where major national companies are located, the Valley Forge Casino, Valley Forge National Park, Philadelphia, and destinations along the NHSL in between)
 - Will connect to Philadelphia International Airport via Norristown Transportation Center
 - Will reduce traffic
 - Will provide transit access to Valley Forge National Historical Park by connecting with the planned North Gulph Road Connector Trail that is sponsored by the Valley Forge Park Alliance
 - Proposed stations and park-and-ride facilities in King of Prussia will increase mobility for residents of all ages and abilities, with or without a car
 - Will provide access to trails
 - Will provide transportation options for all people including seniors, people with disabilities, people without access to cars, young people and bicyclists
 - May save money for a household that can become a one-car household
 - Will increase personal self-sufficiency, giving people more ability to age in place
 - Will attract families to buy homes in King of Prussia because of public transit access
- Supports land use planning
 - Project is identified in Montgomery County's comprehensive plan (*Connections 2045*) as a priority project and major component of the future transit vision
 - Project is identified as a priority in DVRPC's long-range regional plan
 - Will support planning vision for development within walking distance of stations
 - The most successful commercial/office markets in the United States are those that offer a variety of modes of transportation
 - Will be economically beneficial
 - Will increase the desirability of King of Prussia as a place to live, work and play (reducing the burden of its transportation problems)
 - Will increase home values in King of Prussia, which means more tax dollars to the Township
 - Will create construction and permanent jobs, encourage redevelopment and reinvestment in a sustainable manner
 - Will encourage commercial and business growth that will increase tax revenues, thereby keeping King of Prussia residents' taxes low

- Will provide opportunities for mixed-use developments that provide a traffic-reducing combination of employment and residential uses
- Will connect employers with a broader pool of employees and give residents easier access to jobs along the route (including the main NHSL)
- Will attract employees to jobs with high tech companies and the medical industry that are already present in the study area and along the NHSL; will enable growth of the high tech and medical industries in the King of Prussia area
- Will retain existing businesses and support economic growth
- Will benefit tourism by providing access to destinations in King of Prussia
- Will benefit students by increasing access to colleges and universities along the NHSL
- Will increase property values for residents and businesses in King of Prussia because of access to rail transit
- Will benefit Norristown by bringing people to town
- Project is part of the transportation ingredient for growing regional jobs, quality education and the tax base
- An estimated 60% of the cost to build the Project will be spent in southeastern Pennsylvania; the Project will support between 5,400 and 6,300 jobs
- Dealing with daily traffic congestion is cited as a significant reason why employees decide to leave a job in King of Prussia. Also, the hardest positions to fill are late night shifts because there is no or limited access to public transportation. The Project will help workers access jobs in King of Prussia, like the Valley Forge Casino Resort, thereby decreasing employee turnover and helping businesses fill late night work shift positions.
- Will support the viability of the King of Prussia Mall and business areas; such areas tend to be in decline elsewhere
- Will be environmentally beneficial
 - Will improve air quality and reduce automobile emissions
 - Will benefit public health by reducing motor vehicle emissions
 - Will reduce congestion that leads to road rage and car crashes, resulting in injuries and fatalities
- Will reduce costs
 - Will reduce municipal infrastructure costs
 - Will reduce commuter travel expenses
- **Comments on an Alternative or Design Option**
 - Action Alternatives
 - Recommended LPA best achieves the Project purpose and need
 - Best choice for ridership

- Most shift of auto-based trips to transit by 2040
- Most travel time reduction
- Most access to the highest number of jobs within a half mile of proposed stations
- Highest average weekday ridership
- Most auto-based trips shifted to transit by 2040
- Most direct
- Least numbers of potential property impacts and noise impacts
- Lowest cost
- Affects the fewest homeowners and businesses
- Minimizes visual impacts
- Serves the business park with two stops
- Will facilitate redevelopment in the business park
- Best performer, especially with the two design options
- Will provide dependable, on-time service that is available almost around the clock
- Will cut travel time from Norristown or Bridgeport to King of Prussia from 38 minutes to 15, the same time as driving
-
- Recommended LPA is not the best alternative
 - Does not serve the Village at Valley Forge
 - 1st & Moore station is walkable to only 80 businesses (few with consumer interest, few Yelp ratings); mostly medical practices, one hotel
 - Alignment on the south side of the PA Turnpike will negatively impact adjacent residences (noise and visual impacts, property value impacts, potential for sinkholes)
- Use US Route 202 alignment to serve existing businesses, especially Valley Forge Center
- PECO/TP-N. Gulph is best to serve businesses such as the Village at Valley Forge
 - Will serve the Village at Valley Forge (referred to as the Town Center in some comments)
 - N. Gulph station is within 5 minute walk of 140+ businesses, many with Yelp ratings (food, shopping, medical, entertainment, jobs) and housing
 - A station will serve Lockheed Martin
 - Should be extended north and then east along 1st Avenue forming a loop back to the King of Prussia Mall

- Recommended LPA design options address public concerns
 - PA Turnpike North/South Option
 - Responds to community concerns
 - Least potential noise impacts
 - Low number of potential property impacts
 - Will be a safety concern at the Turnpike service area and where it crosses the Turnpike
 - Cost of this option is too high compared to the benefits it would provide
 - Will have a visual impact along the Turnpike
 - 9/11 Memorial Avoidance Option
 - Provides a solution to address potential impacts to the 9/11 Memorial
 - Moving the 9/11 Memorial is an insult to residents
- Other ideas
 - To avoid residences, align the Project along Gulph Road from the casino; use Chester Valley Trail to get up to US Route 202; then run along US Route 202
- No Action Alternative
 - Unacceptable transportation plan for the region; will not address congestion and will constrain future growth and redevelopment
 - Is the right option to save money, preserve the community, protect drinking water, retain the firehouse at its current location, and does not create a new public safety risk
- **Oppose Project**
 - Will not address transportation problems
 - Project is not needed
 - Will not serve future residents in the Village at Valley Forge
 - Will not benefit residents of King of Prussia
 - Will not serve residents' mobility needs within King of Prussia whether its travel to work, shopping or other King of Prussia destinations; other existing modes satisfy these needs
 - Will not address local mobility needs
 - Will increase congestion, especially on roads near stations
 - Will not save travel time to 69th Street Transportation Center compared with the 99 bus; it is faster to get to King of Prussia on the 99 bus right now than it will be using the proposed Project.
 - Will not live up to the ridership projections over the long term

- Will have environmental impacts
 - Will change the character of King of Prussia
 - Construction impacts will be significant (noise, vibration, sinkholes, residential property damage, traffic impacts)
 - Will not improve air quality
 - Will cause permanent noise and visual impacts
 - Will cause loss of privacy and peaceful enjoyment of one's home adjacent to the alignment
 - Will negatively impact health, safety and security of residents
 - Will bring crime
 - Will require riders to transfer at 69th Street Transportation Center, a rundown and insecure location
 - The elevated guideway will be dangerous to drive under and around, especially turning movements
 - Will impact wildlife habitats
 - Potential negative impacts to existing drinking water reservoir
 - Will impact the 9/11 Memorial
- Will increase costs
 - Will cost too much and benefit too few people
 - Source of funding is unknown
 - Waste of taxpayer money
 - Will not reduce costs for automobile maintenance and gas
- Concern for SEPTA's infrastructure maintenance practices
- **FEIS and Design Issues**
 - Avoid or minimize impacts to the PA Turnpike, its right-of-way, its assets and its customers
 - Comply with PA Turnpike Maintenance and Protection of Traffic requirements
 - How will the PA Turnpike North/South Option affect traffic on the PA Turnpike and US Route 202?
 - Coordination with Aqua Pennsylvania will be required regarding their infrastructure
 - Clarify the potential for negative impacts related to the existing Henderson Road Superfund site
 - Clarify the conditions in which the 9/11 Memorial and/or the Fire Company building would be moved
 - What is the Project impact on the drinking water supply?
 - Where will Project funding come from?
 - Clarify how much parking is needed at the western terminus park-and-ride to accommodate the Valley Forge Casino Resort and the Project
 - Will the Project require local support services to be augmented (police, fire, rescue and sanitation)?

- What will be the effect of Project traffic on roadways, especially on roads near stations?
 - Recommend trail connections to the Valley Forge National Historic Park trail system, the Chester Valley Trail and other trails
 - FEIS should specifically include an assessment of the Project construction effect on the Chester Valley Trail Extension
 - New rail vehicles should have hanging bike racks like NJ TRANSIT's RiverLine vehicles; enough bike racks should be provided to meet demand
 - As part of the Project or future station improvements, can more direct platform access be provided between the NHSL and Market-Frankford Line at 69th Street Transportation Center? Signage improvements are needed even if no changes are made.
 - Property value increases will accrue only to residential properties within ¼ mile of any station. In King of Prussia, no residential properties are within ¼ mile of proposed stations.
 - What are the economic benefits of the Project to residents?
 - Stations will not be accessible by walking without significant municipal investment
 - Pedestrian infrastructure improvements should be part of the Project since all transit riders are pedestrians at some point in their trip (sidewalks, street lighting, bicycle lanes, walking trails, transit station provisions)
 - Where, specifically, will funding come from for the Project?
 - What will a fare cost? Parking cost?
 - SEPTA should commit to using the most technologically advanced rails, cars and construction techniques available at the time of construction to reduce vibration, sound, and visual impacts in the Valley Forge Homes community
 - Be sure to purchase enough quality vehicles (citing SEPTA's past experience with problematic new vehicles and not having enough vehicles)
 - According to the King of Prussia Business Improvement District's (KOP-BID) top ten economic development projects, only one (the King of Prussia Mall), will be served by a Project station.
 - More work is needed to integrate the Project into the 1st Avenue area
- **Project Questions**
 - Provide documents
 - Provide the report referenced in the DEIS, *Operating and Maintenance Cost Model Results* by LTK (in response to this comment and early during the DEIS Comment Period, this report was added to Project website)
 - Project information and documents
 - Where will stations be?
 - Provide a map of the proposed Project
 - Define "LPA"

- Regarding the PA Turnpike North/South Option, what is the time estimate for construction completion?
 - Why is there no station proposed at Valley Forge National Historical Park?
 - Was monorail considered as a mode?
 - What happened to the ballot referendum regarding the Project?
 - Why isn't an extension of Regional Rail being considered?
 - Where is a discussion of residents' safety?
- Other issues
 - Why is SEPTA using AECOM as a consultant on this Project in light of a 2009 lawsuit regarding a design problem?
 - How will SEPTA qualify an engineering firm to design the Project?
 - The 1st Avenue Road diet will have an adverse effect on traffic flow
- **Public Outreach**
 - SEPTA has made the environmental process a transparent process.
 - When is the next public outreach event for the Project?
 - How can the public stay informed about the Project?
 - When will the presentation from the hearings be available?
 - Why is a sample letter for residents being circulated to employees at the King of Prussia Mall?
- **Outside of Project Scope**
 - Train horn noise impacts along existing NHSL
 - Train service is needed north and west of Project study area
 - Address traffic congestion and safety problems on Route 422
 - Train service along Route 422 to Reading is needed
 - Need light rail service to Philadelphia International Airport
 - Bridge over Route 422 has an insufficient number of lanes
 - When planning Transit-Oriented Development (TOD) around stations, it is important to allow for recreational land in the mix
 - Encourage a rail-with-trail development between 69th Street Transportation Center and Hughes Park Station (part of Forge-to-Refuge Trail between Haverford and Radnor)

2.2 Stakeholder Resolutions

Resolutions were provided by Montgomery County Transportation Authority and Montgomery County Planning Commission during the DEIS public comment period (Appendix B). Each resolution supports the Project and the recommended LPA.

2.3 Public and Stakeholder Letters of Support

Fifty-three letters of support for the Project were received from the public and stakeholders during the DEIS public comment period (Appendix C). Among these letters, four specifically support the recommended LPA.

2.4 Public Petitions

Two public petitions were received during the DEIS public comment period (Appendix D). Each is summarized as follows:

- Petition from Valley Forge Homes Residents - The first petition, containing 84 signatures, was provided by residents of the Valley Forge Homes community. The petition states a preference for aligning the Project along the north side of the PA Turnpike in the vicinity of the Valley Forge homes neighborhood (the PA Turnpike North/South Option) and not along the south side of the PA Turnpike (each Action Alternative except PECO-1st Ave.). This petition contains original signatures, addresses and signature dates, all of which fall within the DEIS public comment period timeframe.
- Petition from No KOP Rail - The second petition, containing 893 signatures, was created on November 18, 2015 by Bill Metzler (founder of the organization No KOP Rail) on the website www.change.org. The petition, which opposes the Project, was circulated online by means of www.change.org, receiving signatures for over two years before the start of the DEIS public comment period on October 17, 2017. The petition contains typed names rather than actual signatures, location names rather than addresses, and dates when the names were added. The numbers of names added to the petition in relation to key Project milestones are listed below:
 - 537 names were added to the petition before SEPTA identified the recommended LPA at the March 2016 public meetings;
 - An additional 30 names were added to the petition before SEPTA presented the initial PA Turnpike design options to the Valley Forge Homes neighborhood on October 4, 2016;
 - An additional 15 names were added to the petition before SEPTA presented the 9/11 Memorial Avoidance design options to the King of Prussia Volunteer Fire Company on February 16, 2017.
 - 241 names were added after the meeting with the Fire Company but before the start of the DEIS public comment period; and,
 - 70 names were added to the petition during the DEIS public comment period; these names are counted in the total number of comments that oppose the Project. Names added to the petition prior to the DEIS public comment period are not counted in the totals because the names were added before the start of the DEIS public comment period.

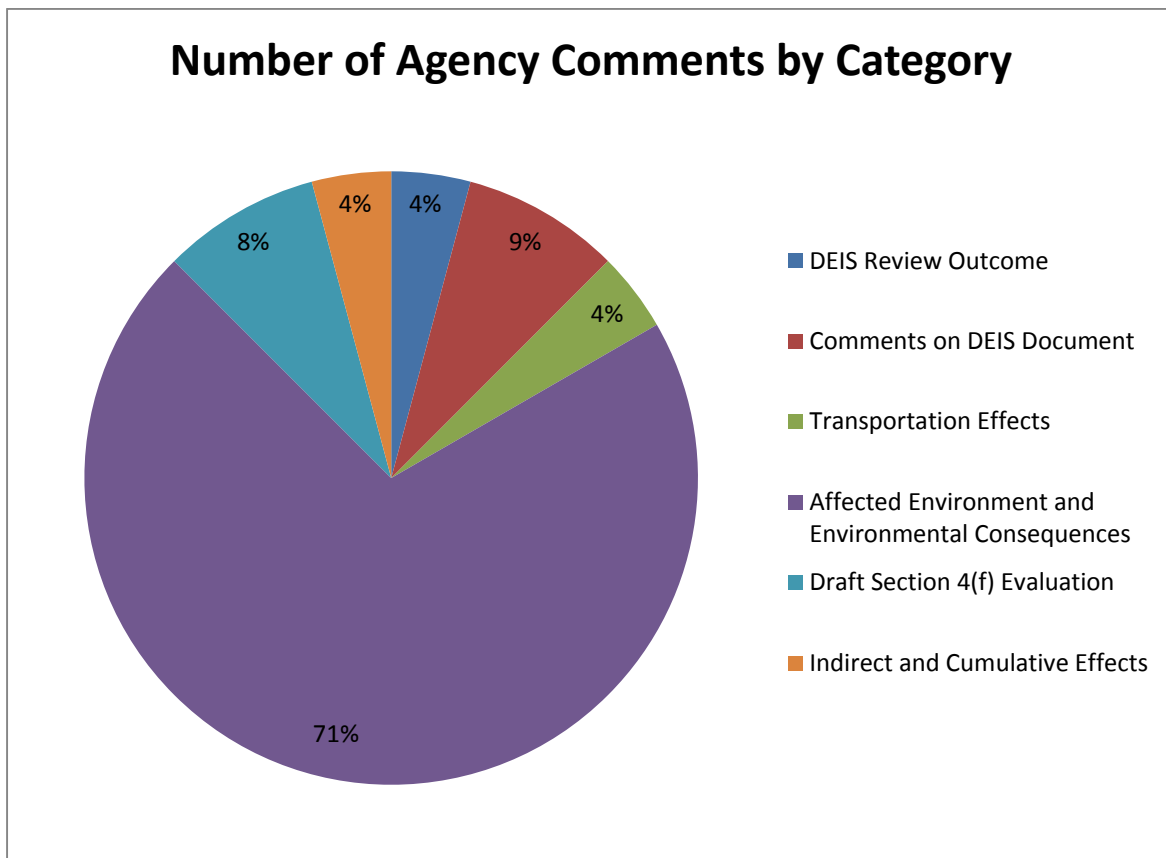
2.5 Agency Comments

Agencies include all federal, state, regional, and local agencies. The following agencies provided comments:

- United States Environmental Protection Agency, Region III (USEPA)
- United States Department of the Interior, Fish and Wildlife Service
- United States Department of the Interior, Office of Environmental Policy and Compliance (USDOI) and National Park Service (NPS)(combined comments)

Appendix E includes letters from the agencies that provided comments during the DEIS public comment period. Twenty-four comments were provided by agencies during the DEIS public comment period. This section organizes the comments into seven broad categories: DEIS Review Outcome; Comments on DEIS Document; Transportation Effects, Affected Environment and Environmental Consequences; Draft Section 4(f) Evaluation; and Indirect and Cumulative Effects. The distribution of agency comments is shown graphically in Figure 2-2.

Figure 2-2: Agency Comments by Category



- **DEIS Review Outcome**
 - Lack of objection finding; no substantive changes to recommended LPA are warranted (USEPA)
- **Comments on DEIS Document**
 - Correct the reference to the Appended State Historic Preservation Office letter (USEPA)
 - Clarify text in air quality section (USEPA)
- **Transportation Effects**
 - Bicycle and pedestrian facilities
 - Recommend local coordination to provide multi-use path connections (USEPA)
- **Affected Environment and Potential Consequences**
 - Environmental Impacts in General
 - Recommend continued investigation of ways to avoid or minimize impacts to the natural and built environment (USEPA)
 - Suggest that FEIS includes additional information regarding potential relocation sites for the Fire Company and 9/11 Memorial (USEPA)
 - Parks, Recreational Land and Open Space
 - Project may alleviate traffic congestion-related impacts to Valley Forge National Historical Park (USDOI-NPS)
 - Western terminus of the Project may increase accessibility to Valley Forge National Historical Park (USDOI-NPS)
 - Historic and Archaeological Resources
 - Clarify Section 106 consultation if recommended LPA is not selected (USEPA)
 - Recommend quantifying partial property acquisitions (USEPA)
 - Recommend quantifying number of residences that would be visually impacted, including significant impacts and mitigation measures (USEPA)
 - Including the Section 106 technical reports in the DEIS appendices would be helpful (USEPA)
 - Explain partial and full property acquisitions (USEPA)
 - Visual and Aesthetic Resources
 - No adverse visual effects to Valley Forge National Historical Park (USDOI-NPS)
 - Air Quality and Greenhouse Gases
 - Recommend MSATs analysis (USEPA)
 - Clarify if construction impacts are captured in the transportation conformity review (USEPA)
 - Stormwater management
 - Consider green infrastructure solutions (USEPA)
 - Hazardous waste
 - Recommend local coordination during development of the construction phase response management plan (USEPA)

- Recommend a coordination plan with PADDEP and USEPA during the FEIS (USEPA)
- Environmental Justice
 - Recommend strengthening assessment by combining minority percentages (USEPA)
 - Further localized analysis of benefits and effects may be needed (USEPA)
- **Draft Section 4(f) Evaluation**
 - The recommended LPA (PECO/TP-1st Ave.) appears to have the least impact on Section 4(f) properties (USDOJ)
 - The two design options are likely to have no adverse effect on Section 4(f) properties (USDOJ)
- **Indirect and Cumulative Effects**
 - The Project will not add cumulative impact to the existing viewshed of Valley Forge National Historical Park (USDOJ-NPS)

3 NEXT STEPS

FTA and SEPTA are reviewing and considering the comments received during the DEIS public comment period as well as the information in the DEIS document. SEPTA will use this information to select an LPA and to make decisions on whether to advance one or both of the recommended LPA design options if the recommended LPA is selected.

FTA will issue a combined Final Environmental Impact Statement (FEIS) and Record of Decision pursuant to Public Law 114-94, 23 U.S.C. § 139(n)(2), as amended by the Fixing America's Surface Transportation (FAST) Act. The FEIS will examine the selected LPA and the No Action Alternative. If the recommended LPA is selected, the FEIS will assess one or both design options if they are selected by SEPTA to be part of the recommended LPA.

Descriptions of activities to be undertaken during development of the FEIS are provided below.

3.1 Refine the Selected LPA

While the DEIS identified potential minimization and mitigation strategies that could be applied to a selected LPA, the FEIS will identify the specific minimization and mitigation commitments SEPTA will undertake as the Project advances. To identify these commitments SEPTA will refine aspects of the selected LPA with the goal of avoiding or minimizing impacts. For example, the DEIS identifies the potential warrant for minimization and mitigation of noise from Project vehicles. In the FEIS, SEPTA will examine where noise impacts would occur, identify appropriate mitigation, and commit to implementing that mitigation as an integral part of the Project.

3.2 Public and Stakeholder Outreach

SEPTA will review, consider and respond to substantive public and stakeholder comments on the DEIS. Responses to comments will take two forms. First, SEPTA may address comments by taking an appropriate action. For example, if a comment relates to Project impacts, SEPTA will look for ways to refine the LPA design to reduce or eliminate impacts, or to identify mitigation. If a comment relates to an outreach issue or a question, SEPTA will simply respond to the comment. In each case, SEPTA's action or response will be reported in the FEIS.

During the FEIS process, SEPTA's program of outreach to the public and stakeholders will continue to occur. This activity will include public open houses and workshops and continuation of the Community Working Group and committee meetings. Outreach methods used during DEIS development will continue to be used during FEIS development.

3.3 Agency Coordination

FTA and SEPTA will review, consider and respond to agency comments in the FEIS. Responses to comments will take two forms. First, FTA and SEPTA will examine ways to address the comments by taking an appropriate action. For example, if a comment relates to Project impacts, SEPTA will look for ways to refine the LPA design to reduce or eliminate impacts, or to identify mitigation. If a comment relates to information in the DEIS, FTA and SEPTA will address the comment with additional or adjusted information in the FEIS. In each case, SEPTA's action or response will be reported in the FEIS.

During the FEIS process, FTA and SEPTA's program of outreach to agencies will continue to occur. This activity will include continuation of Agency Coordination Committee meetings, supplemented with direct coordination with the agencies as warranted. Agency outreach methods used during DEIS development will continue to be used during FEIS development.

3.4 FEIS and ROD Process

After SEPTA selects and adopts the LPA, the FEIS and ROD will be prepared and made available for review in compliance with 23 U.S.C. § 139(n)(2). During FEIS development, SEPTA will refine the selected LPA with the goals of avoiding or further minimizing impacts, as well as developing mitigation commitments related to the selected LPA that will be carried forward into design, construction and operation of the Project. The FEIS will identify the benefits and impacts of the selected LPA and the No Action Alternative, as well as minimization and mitigation commitments related to the selected LPA. The FEIS will also contain SEPTA's responses to substantive comments from the DEIS public comment period.

The ROD is a decision document that will state FTA's decision as to the environmentally preferable alternative in light of the FEIS findings. The ROD will present the basis for FTA's decision and will include the mitigation measures that are to be incorporated into the Project. Additionally, if a monitoring plan is to be developed for mitigation measure(s), the commitment for it will be adopted and included in the ROD. The ROD will be attached to the FEIS according to 23 U.S.C. 139(n)(2), which outlines requirements for a combined FEIS/ROD.

According to FTA's *Standard Operating Procedures for Managing the Environmental Review Process*, one of two approaches will be taken to complete the EIS: a combined FEIS/ROD or an FEIS followed by a ROD. Each approach is described below.

- Combined FEIS/ROD – The completed, combined FEIS/ROD is transmitted to persons, stakeholders, and agencies that made substantive comments on the DEIS. A Notice of Availability (NOA) is published in the Federal Register noting that the FEIS/ROD is available to the public and where the document can be accessed. No request for comment and no required comment period are provided in the NOA for a combined FEIS/ROD.
- Standalone FEIS, followed by a ROD – The standalone FEIS is transmitted to persons, stakeholders, and agencies that made substantive comments on the DEIS. An NOA is published in the Federal Register noting that the FEIS is available to the public for review and where the document can be accessed. The ROD is completed and signed no sooner than 30 days after publication of the FEIS NOA.

Publication of the ROD will be following by FTA's issuance of a Limitation on Claims notice in the Federal Register, a standard procedure that is provided for in 23 U.S.C. § 139(l). The notice will announce that FTA has taken a final action on the Project's NEPA process. The notice limits the time during which legal claims can be made against the Project to 150 days after publication of the notice.

Appendix F Overview of the DEIS Public Comment Period

1. OVERVIEW OF THE DEIS PUBLIC COMMENT PERIOD

The intent of the DEIS public comment period is to enable the public, stakeholders and agencies to review the DEIS document and provide comments. FTA and SEPTA will use the comments along with the technical data in the DEIS to select an LPA and to make decisions in regard to the recommended LPA design options. SEPTA and FTA recognize the importance of public, stakeholder and agency input to the Project decision-making process. One example of SEPTA's action in response to public comments was to develop the recommended LPA design options in the DEIS to address public and stakeholder concerns regarding potential Project impacts.

The DEIS public comment period consisted of the following elements as described in the following subsections:

- DEIS availability for public comment for 53 days
- Opportunities to provide comments
 - Public hearings (oral and written comments)
 - Email and traditional mail (written comments)
 - Project website (written comments)

1.1. DEIS Availability for Public Comment for 53 Days

As previously stated, the DEIS was published on October 17, 2017 with an FTA notice in the Federal Register on that date; the DEIS public comment period ran from October 17, 2017 to December 4, 2017. SEPTA distributed the DEIS document and its Executive Summary to the List of Recipients in DEIS Appendix I, members of the Project committees and others. Printed copies of the DEIS were placed in each of the following public libraries: Upper Merion Township Library, Upper Darby Township Free Public Library and the Montgomery County-Norristown Public Library.

In addition to FTA's Federal Register notice, SEPTA announced the DEIS public comment period and public hearing schedule, along with ways to comment on the DEIS using the following tools: Project website (www.kingofprussiarail.com); flyers on SEPTA vehicles and at stations; announcements in Upper Merion Township Hall and Upper Merion Township's e-newsletter; KOP-BID postings at businesses and on shuttle buses; chambers of commerce email; the Project-specific Facebook page (www.facebook.com/KOPRail); Project-specific Twitter account: www.twitter.com/KOPRail; Project newsletter; press releases in local and regional newspapers, including *Norristown Times Herald*, *Main Line Times*, *King of Prussia Courier*, *Daily News* and the *Philadelphia Inquirer*; and postcard announcements mailed to each address in Upper Merion Township.

1.2. Opportunities to Provide Comments

The Federal Register notice and all communications in regard to the DEIS public comment period included information on how comments could be made. Comments on the DEIS could be provided by the methods described in the following sections; comments received by any of these methods are considered equally.

Public Hearings

Three public hearings were held in two study area locations to provide the opportunity for the public, stakeholders and agencies to provide oral and/or written comments on the DEIS. The particulars of the hearings are listed on the following page.

Monday, November 13, 2017

DoubleTree Hotel, 301 West DeKalb Pike, King of Prussia, Pennsylvania, 19406

Open House and Private Oral Comments: 1 to 2 p.m. and 5 to 6 p.m.; Presentations: 2 p.m. and 6 p.m.;

Public Oral Comments: 2 to 4 p.m. and 6 to 8 p.m.

Wednesday, November 15, 2017

Norristown Municipal Building, 235 East Airy Street, Norristown, PA 19401

Open House and Private Oral Comments: 5 to 6 p.m.; Presentation: 6 p.m.;

Public Oral Comments: 6 to 8 p.m.

The hearings were formal sessions during which oral comments were recorded by a court stenographer. A court stenographer was also available to collect comments during the open house sessions in a separate but adjoining room to the public hearing room. Written comments could be provided at the open houses by means of comment cards.

The DoubleTree Hotel and Norristown Municipal Buildings were chosen as public hearing venues because each is within the study area and each is accessible by automobile and transit. Transit riders could access the public hearing at the DoubleTree Hotel by means of the DeKalb Pike and King Circle bus routes (Buses 99 and 124). Transit riders could access the public hearing at Norristown Municipal Building by means of the Norristown Transportation Center (the NHSL, Market-Frankford Line to Norristown, or the Manayunk Regional Rail line).

As SEPTA is committed to compliance with the nondiscrimination requirements of applicable civil rights statutes, executive orders, regulations and policies, the meeting locations were accessible to persons with disabilities. In particular, and in compliance with applicable laws, such as Title VI of the Civil Rights Act of 1964 and Executive Order 13166 *Improving Access to Services with Persons with Limited English Proficiency*, SEPTA offered, with advance notification, accommodations for those with special needs related to language, sight, or hearing.

SEPTA provided an informal open house at each public hearing venue to enable interested parties to review Project information, ask questions and discuss concerns with SEPTA and

Project team members. The Project website (www.kingofprussia.com) provides access to all materials used at the public hearings and open houses.

SEPTA met with each of the Project committees and the Project's Community Working Group prior to the public hearing to brief members on the DEIS content. At that time, SEPTA invited members to submit comments during the DEIS public comment period and encouraged them to participate in the public hearings.

A total of 398 people attended the public hearings and open houses, including 164 people on November 13 at 2pm, 165 people at 6pm, and 62 people on November 15. Seven officials attended the Elected Officials briefing prior to the November 13 open house.

Email and Traditional Mail

Comments could be emailed to info@kingofprussiarail.com. Comments on the DEIS could be submitted in writing by traditional mail to the Project mailbox at the address below:

KOP Rail Project Mailbox
c/o McCormick Taylor, Inc. ATTN: ECW
Two Commerce Square
2001 Market Street, 10th Floor
Philadelphia, PA 19103

Project Website

Comments could be provided on the Project website (www.kingofprussiarail.com).

Social Media

Comments made via social media (Facebook and Twitter) are not considered part of the formal comments as the NOA, the Project website, and the instructions provided at the public hearings indicated how formal comments could be provided.

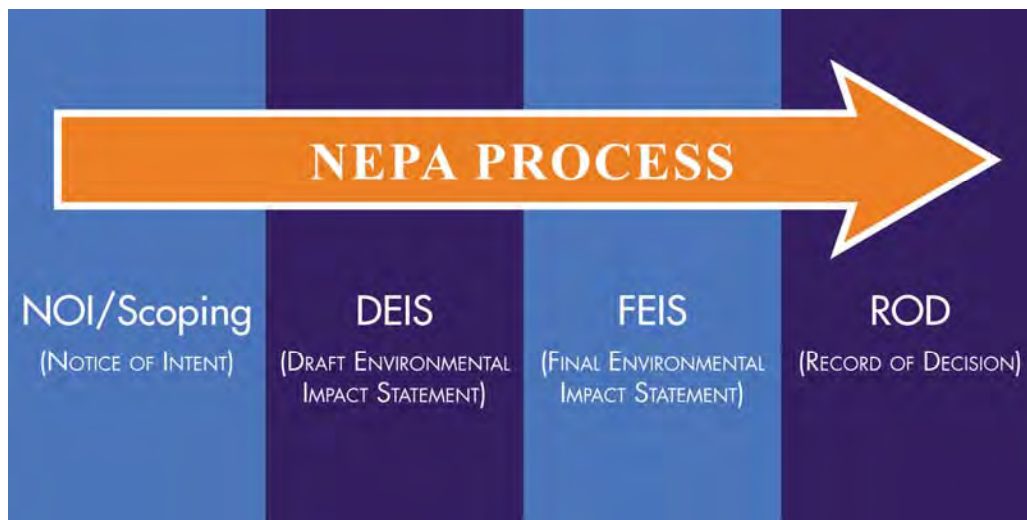
Appendix G NEPA Process Overview and Description

1. OVERVIEW OF THE NEPA PROCESS

The DEIS builds on previous studies, particularly SEPTA's 2003 *Norristown High Speed Line (Route 100) Extension Draft Alternatives Analysis*, which identified a range of alternative alignments to extend NHSL rail service to the King of Prussia-Valley Forge area. The DEIS guides decision-making and meets the federal and state regulatory obligations of FTA and SEPTA.

The steps of the NEPA process discussed in this section are shown graphically in Figure 1-1.

Figure 1-1: NEPA Process



On June 27, 2013, FTA and SEPTA initiated the NEPA process for the Project with a Notice of Intent (NOI) in the Federal Register, containing the information required by the Council on Environmental Quality (CEQ) and codified in 40 C.F.R. Part 1508.22. The purpose and need for the Project, presented in Figure 1-2, was developed and refined during the NEPA process and is a cornerstone of alternative development and evaluation during NEPA.

Figure 1-2: Purpose and Need for the Project

Purpose and Need for the Project

The purpose of the proposed Project is to provide faster, more reliable public transit service to the King of Prussia area 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 King of Prussia area; and
- Better serves existing transit riders and accommodates new transit patrons.

The need for expanded transit service in Montgomery County has been identified for more than 20 years in regional studies and local plans. The Project need stems from existing transit service deficiencies that are expressed by 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 compounded by growing population and employment in the area, concentrations of major commercial development in King of Prussia, and significant planned development for the area.

During the initial, scoping phase of NEPA, FTA and SEPTA developed and evaluated alternatives using a three-tiered evaluation process consisting of progressively more detailed levels of scrutiny. As a result of the tiered evaluation process, five Action Alternatives were advanced for study in the DEIS in addition to the No Action Alternative.

The DEIS discusses how the alternatives were developed and evaluated. It also identifies SEPTA's recommended Locally Preferred Alternative (LPA), as allowed by the CEQ (40 C.F.R. Part 1502.14(e)) and explains how and why SEPTA identified the recommended LPA. The DEIS evaluates the five Action Alternatives and the No Action Alternative. Also in the DEIS, FTA and SEPTA analyzed two design options for the recommended LPA that would reduce the potential impacts of the recommended LPA. Either or both design options could be applied to the recommended LPA as a minimization strategy. The alternatives and recommended LPA design options are described in the following subsections.

The DEIS documents environmental conditions, describes the potential social, economic, and environmental impacts and benefits of each alternative and design option, and identifies potential minimization and mitigation strategies to reduce or eliminate impacts. The DEIS also documents public, stakeholder and agency outreach activities undertaken during the NEPA

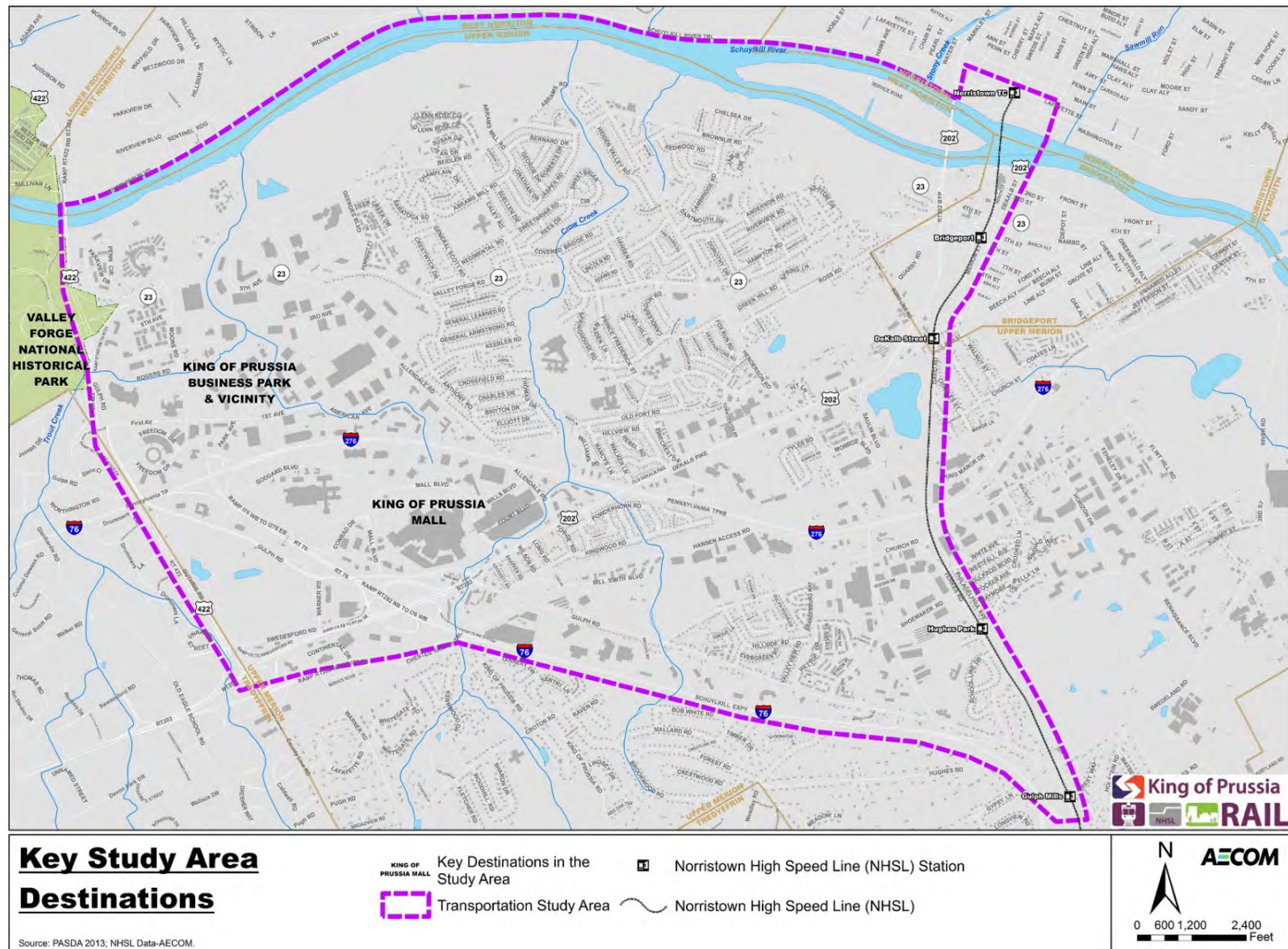
process, comments and concerns received during those activities, and actions SEPTA has taken to address those concerns.

In accordance with 23 C.F.R. Parts 771.123(g) and (h), the DEIS was published on October 17, 2017 with a Notice of Availability (NOA) in the Federal Register on that date. Publication initiated the DEIS public comment period, a required phase of NEPA during which the DEIS can be reviewed and commented on by the public, stakeholders and agencies. Appendix F summarizes DEIS public comment period activities and the methods FTA and SEPTA provided for comments to be made. The DEIS public comment period closed on December 4, 2017 as indicated in the NOA. FTA and SEPTA collected and compiled comments received. FTA and SEPTA will review and use the comments in the process of selecting and adopting an LPA. SEPTA will respond to substantive comments in the Final EIS (FEIS). Section 3 of this report provides more detail on FEIS activities and the FEIS document.

Study Area

In the DEIS, FTA and SEPTA defined a transportation study area within which the potential Project effects were examined. The transportation study area is bounded approximately by the Schuylkill River, US Route 422, I-76 (Schuylkill Expressway) and the existing NHSL. The transportation study area encompasses the key destinations that are focal points of employment density and/or trip attractions. A map of the transportation study area is provided on Figure 1-3.

Figure 1-3: Transportation Study Area Map



1.1 No Action Alternative

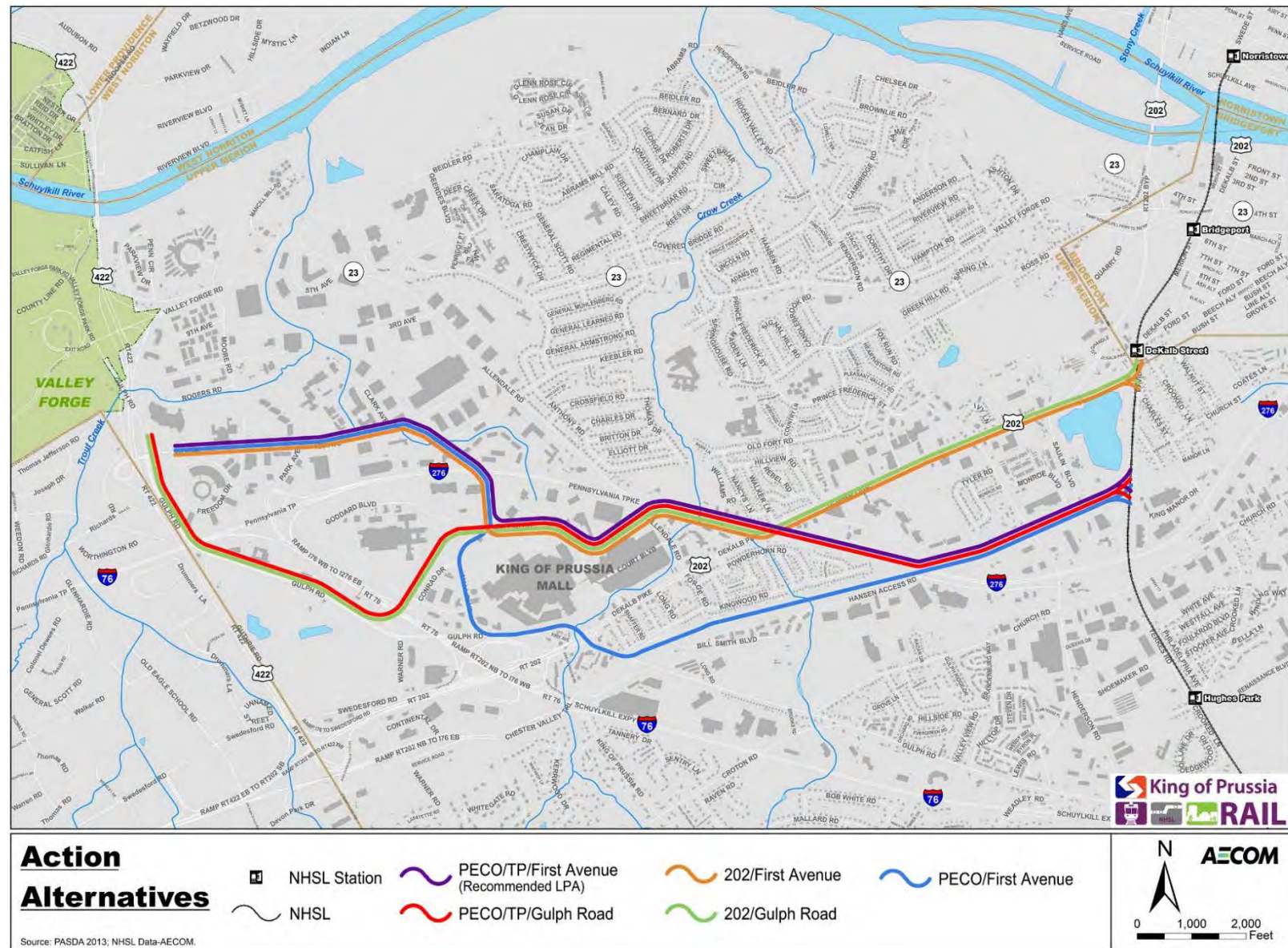
The No Action Alternative is the 2040 condition of transportation facilities and services within the transportation study area if the Project is not implemented. The No Action Alternative assumes that, with the exception of the Project, all other committed projects listed in the financially constrained element of the *Connections 2040 Plan for Greater Philadelphia*, the long-range transportation plan of the DVRPC, are built and operating. The No Action Alternative projects consist primarily of committed capacity and operational improvements to regional and local study area roadways, particularly US Route 422 and the PA Turnpike. In addition to these committed projects, the No Action Alternative consists of highway and transit networks, transit service levels, traffic volumes, and forecasted demographics for the horizon year 2040. The No Action Alternative provides the basis against which the Action Alternatives and recommended LPA design options are compared.

1.2 Action Alternatives and Recommended LPA Design Options

Each Action Alternative evaluated in the DEIS would extend NHSL rail transit service approximately four miles from the existing line to the King of Prussia Mall and farther west, ending in the vicinity of the Valley Forge Casino Resort (VFCR). Each Action Alternative is described below and shown in Figure 1-4. Each Action Alternative and recommended LPA design option also assumes completion of all committed transportation projects listed in the financially-constrained element of DVRPC's *Connections 2040 Plan for Greater Philadelphia*. Among the Action Alternatives, SEPTA identified the PECO/TP-1st Ave. Action Alternative as the recommended LPA. Additional descriptions and maps of the Action Alternatives and related infrastructure are provided in the DEIS.

- **PECO-1st Ave.:** The PECO-1st Ave. Action Alternative would use a portion of the PECO electric utility corridor, passing in front of (to the south of) the King of Prussia Mall, turning north to use a portion of the Norfolk Southern Railroad (NS) Industrial Track before turning west along 1st Avenue and ending near the intersection of 1st Avenue and N. Gulph Road in the vicinity of the VFCR.

Figure 1-4: Action Alternatives



- **PECO/TP-1st Ave. (recommended LPA):** The PECO/TP-1st Ave. Action Alternative would use a shorter portion of the PECO electric utility corridor (compared to PECO-1st Ave.) and a portion of the PA Turnpike, passing behind (to the north of) the King of Prussia



Conceptual rendering of what the recommended LPA could look like along 1st Avenue.

Source: Bergmann Associates, PC, 2016.

Mall, turning north to use a portion of the NS Industrial Track before turning west along 1st Avenue and ending near the intersection of 1st Avenue and N. Gulph Road in the vicinity of the VFCR.

In response to specific concerns about proximity effects of the recommended LPA identified during public and stakeholder coordination activities, SEPTA developed the following two design options for the recommended LPA. Each would reduce potential proximity effects of the recommended LPA. One or both design options could be applied to the recommended LPA as a minimization strategy, subject to public comments on the DEIS.

- **PA Turnpike North/South Option:** This recommended LPA design option would reduce the potential proximity effects (visual and noise) of the recommended LPA on residential properties adjacent to and on the south side of the PA Turnpike. In this design option, the recommended LPA and its infrastructure would be the same as described above between the NHSL and the PA Turnpike; and it would be the same as described above west of the PA Turnpike. However, it would differ from the recommended LPA in its alignment along the PA Turnpike. Where the PA Turnpike crosses the PECO corridor, the PA Turnpike North/South Option would turn off the PECO electric utility corridor onto the north side of the PA Turnpike. East of US Route 202, the elevated guideway would begin to cross over the PA Turnpike as well as US Route 202. As the alignment reaches the south side of the PA Turnpike, the design option would end and the recommended LPA alignment would resume.
- **9/11 Memorial Avoidance Option:** This recommended LPA design option would reduce the potential proximity effects (visual) of the recommended LPA to the 9/11 Memorial on the King of Prussia Volunteer Fire Company property. In this design option, the recommended LPA alignment and its infrastructure would be

the same as described above between the NHSL and just east of the King of Prussia Volunteer Fire Company property; the recommended LPA alignment and its infrastructure would also be the same as described above west of the proposed Court station. As the recommended LPA approaches the Fire Company and just east of the memorial, the 9/11 Memorial Avoidance Option would turn west off the PA Turnpike right-of-way (ROW) and cross the Fire Company property, re-joining the recommended LPA alignment along Mall Boulevard west of Allendale Road.

- **PECO/TP-N. Gulph:** The PECO/TP-N. Gulph Action Alternative would use the same portions of the PECO electric utility corridor and the PA Turnpike as the recommended LPA, passing behind (to the north of) the King of Prussia Mall, turning south to connect to N. Gulph Road before turning west along N. Gulph Road and ending near the intersection of 1st Avenue and N. Gulph Road in the vicinity of the VFCR.
- **US 202-1st Ave.:** The US 202-1st Ave. Action Alternative would use portions of the US Route 202 corridor and the PA Turnpike right-of-way, passing behind (to the north of) the King of Prussia Mall, turning north to use a portion of the NS Industrial Track before turning west along 1st Avenue and ending near the intersection of 1st Avenue and N. Gulph Road in the vicinity of the VFCR.
- **US 202-N. Gulph:** The US 202-N. Gulph Action Alternative would use portions of the US Route 202 corridor, passing behind (to the north of) the King of Prussia Mall, turning south to connect to N. Gulph Road before turning west along N. Gulph Road and ending near the intersection of 1st Avenue and N. Gulph Road in the vicinity of the VFCR.

Each Action Alternative and recommended LPA design option would have the following infrastructure and design elements:

- **ROW needs** – The Project would primarily use existing transportation and utility rights-of-way in the transportation study area.
- **Primarily elevated guideway** – Use of an elevated guideway structure for most of the alignment would avoid impacting the operation of existing roadways and other transportation systems.
- **Stations** – Five to seven stations would be provided in the transportation study area depending on the route of each alternative. Station areas were selected based on their potential to attract ridership, access and safety, engineering feasibility and local planning.
- **Park-and-ride Facilities** – One park-and-ride facility would be provided in the vicinity of the VFCR. Three of the five Action Alternatives (the recommended LPA, PECO-1st Ave., and PECO/TP-N. Gulph), as well as each recommended LPA design option, would provide a second park-and-ride facility in the Henderson Road area. Park-and-ride facilities would also provide for drop-off and pick-up of riders by bus and automobile.

- **Kiss-and ride Facilities** – Proposed station areas without park-and-ride facilities would be kiss-and-ride facilities with walk and bicycle access, providing for drop-off and pick-up of riders by bus and automobile.
- **69th Street Transportation Center in Upper Darby Township, Delaware County** – One new station track would be provided along the north side of the existing NHSL tracks, ending at the existing station building. The new track would serve the existing northern platform on its north side. The platform would be widened to serve the new track.
- **NHSL** – SEPTA would upgrade the signal system on the NHSL to accommodate the Project.
- **Vehicles** – - To accommodate KOP Rail, SEPTA would use its existing fleet of N5 rail vehicles that operates on the NHSL (Figure 1-5), plus six new vehicles. New vehicles would be serviced at the existing SEPTA NHSL maintenance facility, approximately 0.25 miles from the 69th Street Transportation Center in Upper Darby Township.
- **Traction power substations (TPSS)** – TPSS would be provided at approximately 1.0 mile intervals along the proposed guideway alignment.
- **Signal Bungalows** – Small sheds holding signal equipment would be located adjacent to the guideway.
- **Stormwater Management Facilities** - Drainage from the proposed park-and-ride facilities would be managed by stormwater management facilities that would be provided near the park-and-ride facilities.
- **Americans with Disabilities Act Compliance** - The Project would comply with the Americans with Disabilities Act of 1990, as amended.

Figure 1-5: SEPTA N5 Vehicle



Note: Photo of existing SEPTA N5 vehicle.

Source: SEPTA, 2015.

*A*ppendix D

Public Hearing Transcripts

PUBLIC HEARING
SOUTHEASTERN PENNSYLVANIA TRANSPORTATION AUTHORITY
KING OF PRUSSIA RAIL PROJECT

* * *

Public hearing, held pursuant to notice, at
the DOUBLE TREE HOTEL VALLEY FORGE, 301 West DeKalb
Pike, King of Prussia, Pennsylvania, 19406, on Monday,
November 13, 2017, scheduled for 6:00 p.m., before
Krista L. Schultz, Professional Reporter and Notary
Public.

* * *

PRECISION REPORTING, INC.
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(215) 731-9847

I N D E X

* * *

PRESENTATION BY:

LIZ SMITH, PE, PMP - Director, Strategic Planning & Partnerships

PUBLIC HEARING OFFICER:

JOSEPH M. O'MALLEY

PUBLIC ORAL COMMENTS:

Mark S. Schweiker

Kenneth Lawrence

Hakim Jones

Jody Holton

Kathy Holtzinger

Susan Scanlon

Eric Goldstein

Warren Marchese

Mike Bowman

Rick Boyer

Richard Bickel

Dan Platt

Melanie Cichy

PUBLIC ORAL COMMENTS: (Continued.)

Mark Forster

Joan McAndrew

Mike Napolitan

Rob Henry

Susan Groff

Eric Kirse

Teresa D'Angelo

Jacqueline Kamp

John Boyle

James Ankers

Dan Klein

Sarah Burke

- - -

MS. SMITH: All right. If everyone wants to go ahead and take a seat. We are at 6:03, now 6:04, so we want to make sure to get the presentation started as quickly as possible, that way you guys have as much time as you need to make comments.

(Pause.)

All right. So, good evening, everyone. My name is Liz Smith. I'm the director of strategic planning and partnerships at SEPTA, and project manager for the King of Prussia Rail Project. Thank you for coming out to public hearing No. 2.

We have a fairly short presentation to get through before we begin public comments: Just a quick review of the background of the project and the proposed action that we're presenting within the DEIS document; a description of the DEIS document, including the Action Alternative, the recommended Locally Preferred Alternative, and some design options for the Locally Preferred Alternatives; and then we'll talk a bit about the different findings contained

1 within the Draft Environmental Impact Statement,
2 its distribution; the comment period; the public
3 hearing format; oral comment ground rules.

4 So just a quick background: This is
5 SEPTA's current system map. The purple star
6 that you see represents the King of
7 Prussia-Upper Merion area not served by rail
8 today, but served well by bus. We have six
9 different bus routes that travel out to the
10 area, almost 6,000 riders per day; however, due
11 to the heavy congestion experienced on the
12 Schuylkill Expressway and within the King of
13 Prussia area itself, those bus routes are some
14 of the lowest performing in our system with
15 on-time performance rates of only about
16 65 percent.

17 As such, we are proposing to extend the
18 Norristown High Speed Line via a spur. You can
19 see here the current Norristown High Speed Line
20 runs from 69th Street Transportation Center up
21 to Norristown Transportation Center, and the
22 dotted line on this map represents the
23 extension. It would be a one-seat ride from
24 69th Street out to King of Prussia and back, as

1 well as from Norristown Transportation Center
2 and back, with a connection at 69th Street to
3 the Market-Frankford Line, which you would then
4 continue your travels on to both University City
5 as well as Center City.

6 The Draft Environmental Impact Statement
7 considers five Action Alternatives. For those
8 of you that have been involved in the project
9 previously, these were previously presented as
10 the Build Alternatives. These are five
11 alternatives that utilize various roadway and
12 utility rights-of-way to connect from the
13 existing Norristown High Speed Line to key
14 destinations within the King of Prussia area.

15 In March of 2016 we recommended a Locally
16 Preferred Alternative of the PECO/Turnpike-1st
17 Avenue alternative, shown here on the map, total
18 length of four and a half miles, five station
19 stops identified on this map as white dots.
20 Total capital cost of about 1.1 to 1.2 billion,
21 and a ridership of 9,500 riders per day, almost
22 doubling ridership on the Norristown High Speed
23 Line.

24 Based upon feedback that was received at

1 those public meetings in March of 2016, we
2 performed additional public outreach with two
3 residential neighborhoods adjacent to the
4 Pennsylvania Turnpike, Valley Forge Homes and
5 Brandywine Village. As a result, there are two
6 additional design options that have been brought
7 into the Draft Environmental Impact Statement:

8 The PA Turnpike North/South Option, which
9 was based upon community feedback, particularly
10 via the residents in those two neighborhoods;
11 and a 9/11 Memorial Avoidance Option, which was
12 based on both community feedback as well as
13 concerns voiced by the King of Prussia Volunteer
14 Fire Company. To be very clear, that design
15 option has not been approved by the King of
16 Prussia Volunteer Fire Company, but we are
17 committed to continuing to work with them as
18 that option is explored.

19 This map here shows the area where the PA
20 Turnpike North/South Option differs from the
21 originally proposed Locally Preferred
22 Alternative.

23 And this map here shows the area where the
24 9/11 Memorial Avoidance Option differs from the

1 original Locally Preferred Alternative.

2 And more detailed maps of both of these
3 design options are available in the adjacent
4 room, where the plan displays are located.

5 So, the Draft Environmental Impact
6 Statement evaluates the effects of the five
7 Action Alternatives as well as those two design
8 options on a variety of different items,
9 including transportation and traffic; land use
10 and economic development; community facilities;
11 property acquisitions and displacements; parks,
12 recreational land and open space; historical and
13 archeological resources; visual effects; air
14 quality; noise and vibration; natural resources;
15 contaminated and hazardous materials; energy
16 use; and utility effects.

17 The DEIS and its executive summary are
18 available in full on our project website at
19 www.kingofprussiarail.com.

20 Paper copies of the DEIS as well as the
21 executive summary are also available at three
22 area libraries; the Upper Merion Township
23 Library, the Montgomery County Norristown Public
24 Library, and the Upper Darby Township Free

1 Public Library on Bywood Avenue.

2 The comment period for the Draft
3 Environmental Impact Statement runs through
4 Monday, December 4th. Comments can be made in a
5 variety of ways: Directly on the Project
6 website at www.kingofprussiarail.com; via e-mail
7 to info@kingofprussiarail.com; comments can be
8 made in writing to KOP Rail Project mailbox, c/o
9 McCormick Taylor, Incorporated (Attn: ECW), 2
10 Commerce Square, 2001 Market Street, 10th Floor,
11 Philadelphia, PA, 19103; and, of course, you can
12 make comments tonight via either public comments
13 made here at this meeting or private comments
14 that are being taken downstairs with a separate
15 stenographer.

16 All comments, whether they are written,
17 electronic or oral, are given equal weight
18 within this process. No one commenting method
19 is more important than the others.

20 The public hearing format for this
21 evening, we started with an open house that was
22 held from 5:00 to 6:00 p.m. in the adjacent room
23 for an informal review of displays and the
24 opportunity to ask questions of the project team

1 and get those questions answered. Those
2 discussions that were held in the adjacent room
3 are not part of the official comment record, so
4 if you had conversations with project team
5 members and you did not submit those same
6 comments as part of a comment card, or tonight,
7 or during private testimony, or in any other
8 method, please do so.

9 I've just about wrapped up the project
10 overview presentation and then we will commence
11 with the public oral comment session. So with
12 that, I'm going to turn it over to our public
13 hearing officer, Mr. Joe O'Malley, who will go
14 over some of the ground rules for oral comment
15 this evening.

16 MR. O'MALLEY: Thank you, Liz.

17 Good evening. My name is Joe O'Malley,
18 and I will be serving as the hearing officer for
19 this public meeting. My responsibility is to
20 ensure that we have an orderly and polite oral
21 comment session. I want first to review the
22 oral comment ground rules shown on the slide.

23 We will take oral comments only from
24 people who have registered to make oral

1 comments. People will speak in the order of
2 their names on the registration sheets, with the
3 exception that elected officials will be allowed
4 to make oral comments first. All others will
5 follow in the order on the registration sheets.
6 If you have not registered yet and wish to make
7 an oral comment during this session, please go
8 to the back of the room and register at the
9 desk.

10 We have time limits set on oral comments
11 so that we can accommodate the greatest number
12 of people who wish to make oral comments. If
13 you are an individual who registered to make
14 oral comments, you are limited to two minutes,
15 and the two-minute duration will be timed by the
16 clock. If you represent an organization, you
17 are limited to three minutes of oral comments,
18 and the three-minute duration will also be timed
19 by the clock.

20 If you have lengthier comments, meaning
21 longer comments than the time limits will
22 permit, your comments may be provided via other
23 methods that Liz Smith described. Please see a
24 project team representative at the table in the

1 back if you have any questions about how to
2 submit comments.

3 As Liz Smith stated before, all comments,
4 whether written, electronic or oral, are given
5 equal consideration and become part of the
6 public comment of this hearing.

7 As you can see, we have a stenographer
8 working during this hearing to record all
9 comments that are being made. All oral comments
10 will become part of the public record. Please
11 begin your oral comments by clearly stating your
12 name as well as any organization that you may
13 represent.

14 Since this oral comment session for the
15 public hearing is -- I'm sorry, since this is an
16 oral comment session for a public hearing, SEPTA
17 will not be responding to questions. The time
18 is devoted to hearing from those who wish to
19 make oral comments.

20 Formal responses to questions and comments
21 made during this Draft Environmental Impact
22 Statement comment period will occur in the Final
23 Environmental Impact Statement.

24 Before I call our first speaker, I want to

1 say a few words about how we are going to
2 conduct ourselves this evening:

3 We will conduct ourselves politely, be
4 respectful of all speakers while they are
5 speaking, whether you agree or not with what
6 they are saying.

7 No one should be speaking or making other
8 noise while someone else is making their oral
9 comments. In between speakers we will also be
10 quiet.

11 If anyone cannot comply with being polite
12 and respectful, you will be asked to leave the
13 room.

14 I will call each speaker up to the podium.
15 Please use the microphone when making your
16 comments.

17 And now I would like to call our first
18 speaker. I would like to call former Governor
19 Mark Schweiker.

20 MR. SCHWEIKER: Thank you, Mr. O'Malley.
21 I appreciate the opportunity to offer just a
22 couple of thoughts for the record. My complete
23 testimony -- I'm sure the stenographer is happy
24 to hear this remark -- has been provided. So

1 thank you.

2 In light of that, just a couple of
3 thoughts as judgments are made and future
4 decisionmaking is lined up to aid in the
5 completion of what we see as an important King
6 of Prussia Rail Project, but my perspective and
7 formal role tonight is to represent our company,
8 Renmatix, which is at 3rd Avenue on Allendale
9 Road, not too far from here in King of Prussia.

10 So I think it's safe to say that my
11 perspective and some of the accents that I'll
12 offer are consistent with some of the outlook
13 and wishes that the business community would
14 also provide as well.

15 And so I think a quick history note, as we
16 talk about the important work we do in
17 sustainable manufacturing, the kind of people
18 that we recruit to our workplace not too far
19 from here, it's only -- well, it's drive time at
20 rush hour, so probably a little bit longer than
21 at 10:00 a.m., in the morning. That might be a
22 way to make a point as to why important projects
23 like this will ease the mobility challenge for
24 the region, and, in particular, the King of

1 Prussia Mall area.

2 So I'll go back six years ago, when our
3 company, Renmatix, Inc., was contemplating a
4 move of its corporate headquarters and tech
5 center from a suburban Atlanta location to a
6 different location. Ultimately, it was right
7 here in King of Prussia that we -- X marked the
8 spot, but this was after a competition of a
9 couple of states; Delaware, and Virginia, and
10 Georgia wanted to hold onto its corporate
11 headquarters, and Pennsylvania.

12 When all was said and done, for a variety
13 of reasons we wanted to be here, chief among
14 them that in the world of advanced manufacturing
15 and advanced materials and sustainable
16 manufacturing, renewable chemicals, this is a
17 robust place, with plenty of smart people and
18 the right technical skill sets that we needed.
19 And so the decision was made to come here, and
20 we've been operating successfully ever since.

21 In contrast, though, to the picture and
22 the conditions that we observed six years ago, I
23 think we can all agree that it's changed
24 dramatically, particularly as it relates to the

1 roadways that we use and the congestion. And as
2 I mentioned in my notes, and I will make
3 particular reference to the changes, tremendous
4 growth, slower drive times at rush hour with
5 87 percent of KOP's 50,000 commuters driving
6 their car here each and every day, and, as we
7 see it, pressing the need to improve mobility
8 and manage what is essentially a positive
9 condition, positive growth.

10 In our mind, the King of Prussia Rail
11 Project speaks to that relative to our ability
12 to recruit and hold onto the talented people
13 that we have here and to add more. So in that
14 regard, as a member, as a corporate citizen, if
15 you will, of this area, we are hopeful that the
16 project proceeds, because in our mind it's a
17 very positive step at offering travel options
18 and commuting options to would-be employees at
19 Renmatix and the many businesses that are found
20 not too far from here. So, and that's after,
21 you know, considerable assessment and looking at
22 the EIS designs that have been circulated.
23 We're happy with the work.

24 I will say this, having been involved in

1 public life for some time, final remark, that I
2 do want to tip my hat to the SEPTA -- to SEPTA's
3 leadership and the designers, because going
4 where we were two years ago and the line that
5 was being contemplated with some negative
6 impacts particularly on residents, there's less
7 of that. So I do think that SEPTA should be
8 given some acknowledgement and some praise for
9 putting the proverbial ear to the ground and
10 listening to some of those comments and
11 observations and criticisms as to how a more --
12 as far as relying on a fair process and
13 ultimately laying out a line with diminished
14 impact particularly to the residents of the
15 area.

16 So with that, thank you so much for the
17 opportunity to offer comments.

18 MR. O'MALLEY: Okay. Thank you.

19 Next we'll hear from Kenneth Lawrence.

20 MR. LAWRENCE: Good evening. Thank you
21 for the opportunity. My name is Ken Lawrence.
22 I am the vice-chair of the Board of
23 Commissioners for Montgomery County,
24 Pennsylvania, and I'm a board member of the

1 Southeastern Pennsylvania Transportation
2 Authority.

3 I want to offer my full support for the
4 King of Prussia Rail Project and comment on
5 SEPTA's Draft Environmental Impact Statement,
6 including the Locally Preferred Alternative and
7 the design options.

8 Montgomery County's largest employment
9 center, King of Prussia, depends on transit
10 service to function, even though the current bus
11 service has the worst on-time performance in the
12 SEPTA system, due to the traffic on the
13 Schuylkill Expressway.

14 Traffic on the Schuylkill is only
15 projected to get worse. We need a plan for the
16 future that is sustainable. SEPTA's proposed
17 extension of the Norristown High Speed Line to
18 King of Prussia is the most logical and
19 efficient way to connect suburban Philadelphia's
20 largest employment center to the city's two
21 largest employment centers of Center City and
22 University City. This project utilizes the
23 existing Norristown High Speed Line with its
24 high speed frequent service and makes a

1 relatively short extension for this new service.

2 The Locally Preferred Alternative that the
3 Draft EIS recommends is the best out of all of
4 the options; it is the most direct and attracts
5 the second highest number of riders, it is the
6 lowest cost, it affects the fewest homeowners
7 and businesses, it minimizes visual impacts, it
8 serves the business park with two stops and
9 facilitates redevelopment in those areas.

10 Out of all the potential routes, this one
11 is the strongest alignment, especially with the
12 two design options; the North/South Turnpike and
13 the 9/11 Memorial Avoidance Options.

14 We know from the Draft EIS that the KOP
15 Rail Project will significantly reduce the
16 weekday commute. Driving from the King of
17 Prussia Mall to City Hall regularly takes almost
18 70 minutes, while the same trip on an express
19 KOP Rail train will take less than 40 minutes.
20 That's a 30-minute savings, and it is
21 dependable, on-time service that is available
22 almost around the clock.

23 Commuters and residents from our county
24 seat of Norristown and its neighbor, Bridgeport,

1 currently have to endure a 38-minute bus ride to
2 go four and a half miles to the King of Prussia
3 Mall, and even longer to the business park. KOP
4 Rail will cut that down to 15 minutes.

5 The Philadelphia region finally has a
6 transit project that offers a viable alternative
7 to driving on the Schuylkill Expressway. We
8 must move this forward, and I thank you for the
9 opportunity to comment.

10 MR. O'MALLEY: Thank you, Ken.

11 Next we'll hear from Hakim Jones.

12 MR. JONES: Good evening. I represent
13 Norristown Council, 4th District of Norristown
14 at East End.

15 First, I just want to share that I've
16 spent, you know, my life going back and forth
17 from Norristown to the King of Prussia Mall, so
18 I do see this project being something beneficial
19 to the community of Norristown, many of the
20 elderly as well as the teenagers that spend, you
21 know, many of -- much of their time working in
22 the mall and different stores around it.

23 Also, I've been following the project and
24 I do also commend SEPTA. You've been pretty

1 transparent. There were some concerns in the
2 beginning, I've heard from both sides, but
3 you've done great work outlining graphs, data,
4 and studies to pretty much prove that you're
5 looking out for the best interests of both
6 Norristown, Bridgeport and King of Prussia
7 residents.

8 Also, I think it's a great opportunity
9 having a rail trail that's going to bring
10 several thousand people through Norristown. As
11 we're trying to develop our downtown and when
12 we're seriously trying to bring more people to
13 Norristown, we think it's another way that many
14 of those folks will come through Norristown
15 prior to coming to King of Prussia.

16 So I think we as a council should support
17 this, as it's not just going to affect the King
18 of Prussia region, but it's also going to be a
19 good increase and a good boost for us.

20 Thank you.

21 MR. O'MALLEY: Thank you.

22 Next we'll hear from Judy Holton.

23 MS. HOLTON: Good evening. My name is
24 Jody Holton.

1 MR. O'MALLEY: Jody.

2 MS. HOLTON: I am the executive director
3 of the Montgomery Community Planning Commission.
4 The Planning Commission was a participating
5 agency in this Draft EIS. Our transportation
6 planners and myself participated in all the
7 project committees as described in chapter 7.
8 We offer the following comments to support the
9 study process and the recommended Locally
10 Preferred Alternative with the North/South
11 design option:

12 The purpose and need for the project is
13 consistent with the county's comprehensive plan
14 and also our region's long-range plan for
15 transportation. Both these plans identify the
16 project need as a major component of the
17 region's future transportation system to meet
18 existing transportation needs and guide future
19 growth and development.

20 The future land use map for the county and
21 the region encourages redevelopment and
22 reinvestment where infrastructure and
23 development exists.

24 The No Action Alternative is an

1 unacceptable plan for the region and provides no
2 reasonable alternative to the worsening
3 congestion on the Schuylkill Expressway. It
4 also stymies future growth and redevelopment
5 efforts in King of Prussia and Norristown.

6 The EIS is a culmination of a planning
7 process that exceeded expectations and
8 requirements for public involvement, and as a
9 result the recommended Locally Preferred
10 Alternative with the North/South design option
11 directly responds to and resolves community
12 concerns about the proximity of the alignment to
13 backyards along the south side of the Turnpike.

14 This alignment choice is the best choice,
15 it has a low number of potential property
16 impacts and the least potential noise impacts.
17 It also has the highest average weekday
18 ridership, the most auto-based trips shifted to
19 transit by 2040, and provides access to the most
20 jobs within a half mile of the proposed
21 stations.

22 Thank you for the opportunity to comment
23 and participate in the Draft EIS.

24 MR. O'MALLEY: Thank you, Jody.

1 Next we'll hear from Kathy Holtzinger.

2 MS. HOLTZINGER: Hi, my name is Kathy
3 Holtzinger, I'm a Valley Forge homeowner, and I
4 am against the SEPTA King of Prussia Light Rail.

5 The best I can hope for is that this route
6 will be put on the north side of the
7 Pennsylvania Turnpike at the rest stop side.

8 I just would like to give a little
9 response to everyone who is in favor of the
10 SEPTA KOP Light Rail. Would you be willing to
11 give up the privacy and the peaceful enjoyment
12 of your home at the end of the day for the KOP
13 SEPTA Light Rail? If this route was going to
14 put your home and property in the direct line of
15 the train, maybe 30 to 40 feet from your back
16 door, being 40-plus feet in the air to go over
17 the top of 202, would you still be excited to
18 have the SEPTA light rail come to KOP? Would
19 you be willing to sacrifice the most important
20 investment and possession you or your family own
21 for your community? I believe I can answer
22 these questions for everyone who is in favor of
23 this project; the answer would be no.

24 And I have spoken about many, many things,

1 I've spoken about sinkholes and noise vibration
2 and -- but I'm just -- I'm not a CEO, I don't
3 own the casino, I'm not a builder, I'm not an
4 investor. I'm a homeowner and I'm an American
5 citizen and I want to keep my home and I want to
6 keep the value.

7 Thank you.

8 MR. O'MALLEY: Thank you, Kathy.

9 (Applause.)

10 MR. O'MALLEY: Next we'll hear from Susan
11 Scanlon.

12 MS. SCANLON: Good evening. I, too, am a
13 resident of Valley Forge Homes and have been
14 living there for 11 years now. My neighborhood
15 will be greatly impacted should the south side
16 of the Pennsylvania Turnpike become the
17 designated recommended Locally Preferred
18 Alternative, LPA.

19 The Valley Forge Home residents prefer to
20 have the proposed King of Prussia Rail be placed
21 on the north side of the Pennsylvania Turnpike,
22 where the King of Prussia service plaza is
23 located.

24 While my house and backyard is barely

1 escaping the train, I will still hear it, just
2 as I currently hear the everyday traffic on 202
3 behind my house. I feel bad for my neighbors
4 who live on Powderhorn Road, Bluebuff and the
5 cul-de-sac of Kingwood Road, where they could
6 end up having this train in their backyard
7 should the -- and lose their privacy should the
8 south side of the PA Turnpike be selected as the
9 Locally Preferred Alternative.

10 I would also like to add that there are
11 many light rail systems that have been built
12 across the country, and many of them have ended
13 up not having the ridership that was expected.
14 I believe that the King of Prussia Rail may
15 start out with a high ridership for the first
16 few years, but then ridership could drop off
17 tremendously. Anyone who owns a car will drive
18 their car wherever they need to go. They will
19 not rely on or take public transportation on a
20 daily basis.

21 Thank you.

22 MR. O'MALLEY: Thank you, Susan.

23 (Applause.)

24 MR. O'MALLEY: Next we'll hear from Eric

1 Goldstein.

2 MR. GOLDSTEIN: Good evening. My name is
3 Eric Goldstein, executive director of King of
4 Prussia District.

5 On behalf of the board of directors,
6 committee members, 301 commercial property
7 owners of Upper Merion Township, and the staff
8 of the King of Prussia District, I am here to
9 enthusiastically support the King of Prussia
10 Rail.

11 King of Prussia District was created by
12 the township in 2010 to engage public and
13 private partners to collaboratively improve the
14 economic environment in King of Prussia by
15 making it more vibrant and attractive and
16 prosperous.

17 Since the creation of the King of Prussia
18 District, our work has helped to stabilize a
19 declining commercial office market, improve the
20 retail and dining scene, increase property
21 values on what was a stagnant market, and
22 promote King of Prussia as a top destination for
23 employment, entertainment, shopping, and living.

24 King of Prussia District believes that the

1 extension of the Norristown High Speed Line is
2 necessary to continue the momentum that has been
3 created. We know that the most successful
4 markets in the United States are those that
5 offer a variety of modes of transportation.
6 King of Prussia Rail is an essential investment
7 in that regard.

8 King of Prussia Rail will help steer
9 future development into concentrated areas that
10 can handle the growth without causing additional
11 burdens on township roadways and resources.

12 King of Prussia Rail will provide
13 opportunities for mixed-used developments that
14 will blend employment opportunities with
15 residential living, the key to traffic
16 mitigation. Widening roadways is not the cure
17 for congestion issues. The best ways to address
18 traffic and congestion is to convert commuters
19 into residents by adding high quality housing
20 opportunities and expand public transportation
21 options so that the use of single-occupancy
22 vehicles is not the only mode available.

23 King of Prussia District also believes
24 that the King of Prussia Rail will help

1 residents of the township reduce commute times
2 to University City and Center City by as much as
3 30 minutes each day, connect employers to a
4 broader pool of employees, and give residents
5 easier access to jobs along the route, including
6 numerous academic and medical institutions
7 located along the Main Line, University City and
8 Center City.

9 We will reduce up to 18 million vehicle
10 miles traveled annually, resulting in less
11 congestion and reduced emissions; generate 5,400
12 to 6,300 direct and indirect jobs during
13 construction and 1,000 jobs annually thereafter;
14 increased commercial real estate values, which
15 in turn increase tax revenues, this will ensure
16 that the residents of King of Prussia maintain
17 their extremely low property taxes; it will
18 provide efficient and dependable passenger rail
19 service to the largest employment center in the
20 township.

21 It is for these reasons and for the
22 continued health of the township and the
23 Philadelphia region as a whole the King of
24 Prussia District supports the extension of the

1 Norristown High Speed Line.

2 Thank you.

3 MR. O'MALLEY: Thank you, Eric.

4 Next we'll hear from Warren Marchese.

5 MR. MARCHESE: Thank you.

6 The proposed extension of the Norristown
7 High Speed Line does not benefit citizens of
8 Upper Merion. It only benefits the businesses
9 that are pushing for its development.

10 We aren't just a mall and a casino, we are
11 a community. Recently I witnessed more than
12 two-dozen children at my kid's elementary school
13 here in King of Prussia that were sent to school
14 with no lunch. The school does their best to
15 give at least a grilled cheese sandwich to them
16 to help them through the day. How many
17 thousands of families would benefit from the
18 \$1.2 billion proposed for this project? The
19 major benefactor should not be a mall or a
20 casino, but the entire community.

21 Adding rail to King of Prussia is another
22 way businesses are driving the transformation of
23 King of Prussia from a town to a city. It'll
24 cause irreversible destruction of our beautiful

1 community. If I wanted to live in a city, I
2 would move to a city.

3 Rail lines are extremely rigid. Once
4 they're constructed they cannot be changed. As
5 the needs of the riders change, the rail cannot.
6 Transportation technology is advancing at an
7 extremely high pace. Ride sharing, automated
8 vehicles will be taking groups of riders door to
9 door on demand rather than from station to
10 station. Rail riders will always need to figure
11 out the first and last miles of their trip, no
12 matter what the weather.

13 I've been to most of these rail pep
14 rallies, and it's always been marketed as
15 something that's a done deal. I have never seen
16 the option to vote against it. To be fair, all
17 rail presentations and proposals should have a
18 place for residents to say no to the entire
19 project.

20 Conversely, across the United States rail
21 lines whose times have come and gone are
22 increasingly excellent sources of land to be
23 converted to healthy hiking, running and biking
24 trails. I live in King of Prussia, not

1 Morristown, New Jersey.

2 (Applause.)

3 MR. O'MALLEY: Thank you, Warren.

4 Next we'll hear from Mike Bowman.

5 MR. BOWMAN: Thank you.

6 Good evening. My name is Mike Bowman.

7 I'm the president and CEO of Valley Forge
8 Tourism.

9 It's simple, we at Valley Forge Tourism
10 and Convention Board enthusiastically endorse
11 the SEPTA rail line. From a tourism standpoint,
12 the project creates thousands of jobs and
13 bolsters the economy. The project will promote
14 and strengthen regional growth and economic
15 development of the largest commercial center in
16 the suburban Philadelphia region for employees,
17 visitors, and still growing and expanding,
18 especially with the King of Prussia Town Center.

19 There's almost 60,000 people who work in
20 the King of Prussia area, and the Delaware
21 Valley Regional Planning Commission expects that
22 number to go to 64,000 by 2035. The landmarks
23 like the Valley Forge Historic Park, King of
24 Prussia Mall attract more than 22 million

1 tourists a year and shoppers. That's an average
2 of 130,000 people in the area every day.

3 There's a need -- there's a need for an
4 efficient transportation system to ease some of
5 the traffic and delays. The SEPTA rail line is
6 important, because it will only encourage more
7 visitors to the King of Prussia, Valley Forge
8 and Montgomery County region with reliable
9 transportation in other ways.

10 Tourism is a major driver from Montgomery
11 County's economic standing, in the standing.
12 Spending in Montgomery County reached \$1.5
13 billion last year in tourism alone. In 2016
14 tourism spending supported 4.1 percent of all
15 jobs in Montgomery County, employing close to
16 20,000 people associated with tourism.

17 The project will have an incredibly
18 positive impact on Montgomery County's 1,600
19 restaurants, 75 hotels, family attractions, and
20 more than 200 arts and culture venues; not to
21 mention, SEPTA's KOP Rail will offer easier
22 access to the medical and educational
23 institutions as well as students and faculty
24 traveling in amongst our ten universities and

1 colleges right along the Norristown Rail Line.

2 More transit connections also increase
3 property values adjacent to the line and create
4 opportunities for new office, housing projects,
5 and retail. And again, Valley Forge Tourism and
6 Convention Board supports this project.

7 Thank you.

8 MR. O'MALLEY: Thank you, Mike.

9 Next we'll hear from Rick Boyer.

10 MR. BOYER: Thank you. Rick Boyer, I'm a
11 resident.

12 TOD, transit-oriented development, allows
13 for an area within approximately a quarter mile
14 or so from a transit stop to be rezoned and
15 redeveloped for a different or new land use,
16 whether it be commercial, residential, open
17 space, recreation, et cetera.

18 Residing in the Hughes Park neighborhood,
19 my neighbors and I have seen this occur where a
20 property long-zoned as industrial have been
21 rezoned to residential. It's yet to break
22 ground, but it's going to be approximately 300
23 new apartments into our neighborhood.

24 With new stops being proposed in the

1 current developed areas, two stops on 1st Avenue
2 and two stops at the mall, I would like to see
3 more details and examples on how additional TOD
4 zoning could not only affect and enhance new
5 stops, but also on current residential stops in
6 Gulph Mills, Hughes Park and Bridgeport.

7 I feel it's important to maintain and
8 enhance the strength of our residential
9 communities by reserving open space or provide
10 strong recreation areas for our growing families
11 here in King of Prussia.

12 MR. O'MALLEY: Thank you, Rick.

13 Next we'll hear from Rich Bickel.

14 MR. BICKEL: Good evening. My name is
15 Richard Bickel. I am a retired urban and
16 regional planner previously employed by the
17 Delaware Valley Regional Planning Commission,
18 SEPTA and Montgomery County Planning Commission.
19 I'm here tonight to present the position
20 statement of PenTrans. I am a board member of
21 PenTrans, and they have authorized this position
22 statement.

23 For those who may not be familiar,
24 PenTrans is a multimodal transportation advocacy

1 organization that works to influence better
2 transportation planning and investment decisions
3 by fostering an effective dialogue among public
4 officials, technical experts, stakeholders, and
5 the public.

6 What is our position? PenTrans strongly
7 supports the timely completion of the Draft
8 Environmental Impact Statement and the
9 advancement of the King of Prussia Rail Project
10 toward implementation consistent with the
11 recommended Locally Preferred Alternative.

12 Our rationale is similar to the handout
13 that SEPTA prepared that lists the benefits of
14 the project. The proposed King of Prussia Rail
15 Project will enhance access to both Upper Merion
16 and Norristown for workers and residents;
17 facilitate intermodal connections to shopping,
18 jobs and residential areas; provide improved
19 commuting times between King of Prussia and
20 Philadelphia; and generate new economic
21 development activity with increased market
22 values and tax revenues.

23 Additional benefits include helping to
24 reduce traffic congestion, improving air

1 quality, supporting more compact development
2 patterns, and strengthening the overall quality
3 of life for the area.

4 We have an additional comment. SEPTA and
5 the consultant team have been diligent in
6 listening to local community and neighborhood
7 issues and concerns, resulting in corridor
8 realignments with related mitigation efforts.
9 These modifications have incorporated -- have
10 been incorporated in the Locally Preferred
11 Alternative. We hope that this approach will
12 continue as the project advances, with careful
13 consideration of the concerns of local residents
14 and the possible need for additional mitigation
15 activities.

16 Thank you for the opportunity to make
17 these comments. We think this is a
18 vitally-needed project for the Philadelphia
19 region. It should have been built yesterday.
20 We're here today. Let's get it built tomorrow
21 as quickly as possible.

22 Thank you.

23 MR. O'MALLEY: Thank you, Rich.

24 (Applause.)

1 MR. O'MALLEY: Next we'll hear from Dan
2 Platt.

3 MR. PLATT: Good evening. MY name is Dan
4 Platt. I'm the chief financial officer of UGI
5 Utilities, and I'm here this evening to read a
6 letter on behalf of John Walsh, president and
7 CEO of UGI Corporation.

8 As an employer of approximately 450 people
9 in King of Prussia, I am writing on behalf of
10 UGI Corporation and AmeriGas (inaudible).

11 (Multiple people commenting about not
12 hearing.)

13 MR. PLATT: As an employer of
14 approximately 450 people in King of Prussia, I
15 am writing on behalf of UGI Corporation and
16 AmeriGas to actively endorse King of Prussia
17 Rail. I believe that this vital infrastructure
18 project will provide significant benefits to the
19 residents, employees and businesses of Upper
20 Merion Township and the Greater Philadelphia
21 region.

22 This direct transportation alternative
23 connecting Philadelphia to the largest
24 commercial center in the suburban region will

1 reduce traffic congestion, enhance economic
2 development in the local community, and broaden
3 access to quality employees for employers in
4 King of Prussia such as UGI.

5 As evidenced by recent commercial and
6 residential economic activity, King of Prussia
7 is a vibrant and growing community. King of
8 Prussia Rail is a logical step to provide the
9 needed infrastructure to allow for growth in the
10 local economy while providing residents in
11 Philadelphia and the surrounding communities
12 with convenient and reliable public
13 transportation service, King of Prussia area
14 jobs and amenities.

15 UGI, along with our affiliate, AmeriGas,
16 has been an employer in King of Prussia for more
17 than 40 years and we place significant value on
18 our long-term and successful partnership with
19 the local community. UGI endorses King of
20 Prussia Rail and we encourage our community
21 business partners to do so as well.

22 Thank you for the opportunity to comment.

23 MR. O'MALLEY: Thank you, Dan.

24 Next we'll hear from Melanie Cichy.

1 MS. CICHY: Cichy.

2 MR. O'MALLEY: Please spell your name.

3 MS. CICHY: C-i-c-h-y.

4 I have been a resident of King of Prussia
5 for seven years. I love public transportation,
6 but this proposed rail is a bad fit for this
7 community. There are several problems that I
8 see with it:

9 There's poor planning with Town Center.
10 It's out there, there's tons of new apartment
11 buildings and they're -- it's completely cut off
12 from the rail.

13 The actual destination of the rail goes to
14 69th Street and then you need to transfer to
15 actually get into Center City, where a lot of
16 people would actually want to go.

17 Personally, I would never use this rail,
18 because for me it would be easier to drive to
19 Radnor, to park there to take the
20 Paoli-Thorndale Line, and it's actually cheaper,
21 too. I did a whole analysis and found out it's
22 going to cost me \$9.25 to go to the airport
23 using the Paoli-Thorndale Line versus \$9.75 to
24 use the Norristown High Speed Rail with all the

1 transfers; and it's also quicker for me to take
2 the Paoli-Thorndale Line versus the Norristown
3 High Speed Rail with all the transfers.

4 Something else they don't really consider
5 is when -- I keep hearing this phrase,
6 "bolstering the economy." It's completely
7 speculative. There's no one that can know what
8 the future will hold. It's only predictive and
9 it's hopeful.

10 Not all areas -- all areas of travel are
11 even accounted for. There are tons of different
12 roads that filter into King of Prussia; we have
13 202, 422 and 76. This one specifically
14 addresses just from the Philadelphia area and
15 does not address the ton of traffic that comes
16 from the other areas. Why wouldn't SEPTA
17 propose rails from that -- from other areas to
18 come into King of Prussia as a way to actually
19 sustain this area and decrease the congestion?

20 And, also, parking options, I saw there's
21 two parking spots available, but then there's
22 stations along the way that don't have parking
23 available. As a resident, I wouldn't want to
24 use the ones in the middle rather than have to

1 go to the end lines.

2 (Applause.)

3 MR. O'MALLEY: Thank you, Melanie.

4 Next we'll hear from Mark Forster.

5 MR. FORSTER: Good evening. My name is
6 Mark Forster. I'm a life-long resident of Upper
7 Merion Township. I'm also the chairman of the
8 board and vice-president of the King of Prussia
9 Volunteer Fire Company. I'm speaking on behalf
10 of the fire company this evening.

11 The fire company has been referenced in
12 several recent conversations and meetings
13 regarding the proposed SEPTA King of Prussia
14 Light Rail System. The board of directors of
15 the volunteer fire company would like to advise
16 the residents, businesses and visitors to our
17 area that your safety is our primary concern.

18 While SEPTA's met with some board
19 members -- some King of Prussia Fire Company
20 board members -- to explain their ideas, the
21 board of directors is not supportive in any of
22 the proposed situations that affect our property
23 or our operations.

24 In the development of the most recent

1 report, at no time was the fire chief or the
2 administrator, the leadership of the fire
3 company consulted about potential impacts and
4 the issues upon the public or the fire company
5 property. Their environmental impact study is
6 slightly flawed. There is no mention of public
7 safety anywhere in the study.

8 Thank you.

9 (Applause.)

10 MR. O'MALLEY: Next we'll hear from Joan
11 McAndrew.

12 MS. McANDREW: Hello. He seems to be a
13 hard act to follow in this room.

14 I am a resident for the last 15 years of
15 -- in Brookwood. I like this area, it has lower
16 taxes, better services. Love the plowing. I
17 went to the University of Buffalo.

18 One of the things that was mentioned was
19 traffic congestion being decreased. Wouldn't we
20 all want 202, 76, 276, even 476 to be not peak
21 hours but at least not dipping hours where you
22 just sit in traffic? The -- I don't -- I can't
23 really foresee traffic decreasing. The best I
24 could hope for is that it would remain the same;

1 but we are going to be getting rid of the buses,
2 from my understanding, which helps the air
3 quality.

4 If this area is a growing area, that
5 usually means growing congestion, so I have
6 concerns regarding this. But I was also an
7 administrator of a business that ran 24/7, so I
8 can see the positives from the standpoint of
9 businesses. It makes a whole lot of sense and
10 hopefully dollars for them. But, also, when
11 running a business 24/7, the noise level,
12 especially when you're talking about at night
13 people going back and forth. And if this rail
14 is within someone's backyard, it doesn't seem
15 fair to them.

16 The greening of America that we're all
17 supposed to be striving for, yes, the rail will
18 be quieter, it will be hopefully more
19 cost-effective.

20 I want to take Jody's and the fire
21 department's extra minutes, because I say that
22 the greening, we have to see about tourism. All
23 right. We have a gem, the Valley Forge National
24 Park. Why won't the line go that far? If it's

1 going that far for working, why not for the
2 people coming out of the city and enjoying a
3 national park?

4 I grew up in Delaware County, hopped a bus
5 as a teenager, went to 69th Street. I'm the
6 oldest of 11. By the time my younger sister,
7 who's 15 years younger than me, came along, it
8 wasn't a good place to go by yourself. So we
9 need increased support services; the police, the
10 fire, EMTs, we need the sanitation. When I go
11 through 69th Street now, it's like I'm afraid to
12 touch anything. It's -- it scares me. Then
13 there's the safety issues. So what's going to
14 happen with this over time?

15 Thank you for your time today.

16 (Appause.)

17 MR. O'MALLEY: Thank you, Joan.

18 Next we'll hear from Michael Napolitano.

19 MR. NAPOLITAN: My name is Mike Napolitan,
20 N-a-p-o-l-i-t-a-n. I'm a professional
21 geologist.

22 And today we are here for the Draft
23 Environmental Impact Statement, and no one
24 speaking yet has talked about the environmental

1 impact.

2 The impact of this -- if you've noticed,
3 SEPTA doesn't bring it up, and in their nice
4 little presentation earlier they kind of started
5 the Henderson Road Train Station. And the
6 reason why is because this line comes off of the
7 main line right beside our drinking water
8 aquifer reservoir at the quarry that Aqua
9 controls. It is also directly down-gradient of
10 a Superfund site that has impacted that quarry
11 in the past, and is currently, in the recent
12 environmental review period of that Superfund
13 site, has found more contamination in the
14 ejection well.

15 So SEPTA doesn't even discuss that in
16 their Draft Environmental Impact Statement.
17 They don't talk about how it will affect our
18 water quality that everyone drinks. Whether you
19 have visibility of the train line, whether it's
20 coming past your house, you have vibrations,
21 whatever the issue is, it will impact almost
22 every resident in Upper Merion if this is
23 allowed to happen, because it'll change the
24 conditions that are currently in existence with

1 the Superfund site and our drinking water
2 aquifer.

3 So I'm just a resident here, I don't have
4 any power other than what I can do here, but I
5 think that their Environmental Impact Statement
6 is severely lacking, they need to do studies to
7 ensure us that our drinking water aquifer will
8 not be impacted, the reservoir.

9 Thank you.

10 MR. O'MALLEY: Thank you.

11 Next we'll hear from Rob Henry.

12 MR. HENRY: Thank you. Good evening.

13 Good evening. My name is Rob Henry. I'm
14 the executive director of the GVF, a
15 not-for-profit transportation management
16 association headquartered in King of Prussia,
17 Pennsylvania.

18 GVF has been headquartered in King of
19 Prussia for over 27 years and our mission is to
20 achieve a desirable quality of life and healthy
21 competitive economic environment by developing
22 multifaceted transportation strategies.

23 Everything we do is done through the science of
24 transportation demand management. TDM is

1 managing demand on the system and creating
2 alternatives to enhance the system in the most
3 efficient and effective ways. GVF works with
4 all levels of government throughout the private
5 sector to tackle our most challenging
6 infrastructure projects.

7 Public transit is often the backbone of a
8 strong and thriving community. The King of
9 Prussia Rail extension is a much-needed
10 enhancement to this community and our region for
11 a variety of reasons.

12 Our organization was founded in
13 partnership with Upper Merion Township in 1990
14 as employers were struggling to get their
15 employees to and from work. Since that time,
16 we've worked on countless projects to further
17 enhance the Upper Merion community. We've
18 worked on highway capacity projects, trail
19 extension, enhancements to SEPTA's bus and local
20 bus service, and many others; but as the
21 community has continued to grow, so has
22 congestion. The King of Prussia Rail Project
23 would be an amazing amenity for Upper Merion and
24 the region for many years to come.

1 As our world is changing and as new
2 mobility options are coming to the forefront,
3 it's imperative we invest in smart
4 transportation choices. The King of Prussia
5 Rail Project is one those choices.

6 I also have the privilege of serving as
7 the president of ACT, which is an international
8 association that focuses on smart transportation
9 investment throughout the community. As I
10 travel the United States, I see communities
11 investing tens of billions of dollars in public
12 transit in order to provide access to their
13 communities for both residents and employers.
14 The King of Prussia Rail Project is a
15 transformative project that will do just that.

16 I applaud SEPTA and the King of Prussia
17 Rail Coalition, of which we are a founding
18 member, for moving this much-needed project
19 forward.

20 Thank you.

21 MR. O'MALLEY: Thank you, Rob.

22 Next we'll hear from Sue Groff.

23 MS. GROFF: Okay. My name is Susan Groff,
24 G-r-o-f-f, and I'm representing the Valley Forge

1 Homes Civic Association.

2 As a long-time King of Prussia resident, I
3 would like to formally state my concerns about
4 this project. It seems as if the only people it
5 will benefit are the businesses in King of
6 Prussia, the mall, the casino, and the workers
7 that will come from the city, Upper Darby and
8 Norristown. There is a lot of talk about how
9 the rail will increase commerce and increase
10 property value, but that will only affect the
11 people who own the businesses being able to pay
12 lower-wage workers and the developers who will
13 build apartments or condos closer to the train
14 station.

15 If the board of directors chooses to pick
16 the original LPA that hovers along our
17 backyards, that will seriously decrease our
18 property value and will change our neighborhood
19 for the worse.

20 I don't see how this high speed line that
21 goes into one of the worst suburbs of
22 Philadelphia is going to be appealing for any
23 suburban person who wants to commute into the
24 city. It's inefficient and quite possibly

1 dangerous for people to have to transfer in such
2 a rundown and insecure location just to get to
3 their location downtown.

4 Many people don't want this train here at
5 all. It's not going to help the residential
6 community, only the business community. I
7 personally will never take the train, because of
8 where the transfer is to complete the trip into
9 the city. I especially do not want this train
10 in my backyard, as do many others in Valley
11 Forge Homes, but if it has to happen because the
12 powers that be with the deep pockets want it to
13 happen, then it needs to be on the other side of
14 the turnpike, the Alternative North/South
15 Option. That is the only vaguely acceptable
16 option for our neighborhood.

17 And, in addition, the video shown during
18 the open house did not show the LPA that runs
19 directly behind our homes. According to the
20 DEIS, that original LPA still exists as an
21 option. People need to see that option if it's
22 still a possibility. Only showing the design
23 alternatives is not transparent. People need to
24 see how this can affect our homes. Show that

1 video, you may not get the same support.

2 Thank you.

3 (Applause.)

4 MR. O'MALLEY: Thank you.

5 Next we'll hear from Eric Kirse.

6 MR. KIRSE: My name is Eric Kirse. I've
7 been a local resident of the King of Prussia,
8 Valley Forge area for the last ten years.

9 I'd like to just express my gratitude for
10 the people who are, you know, putting this rail
11 project together. It's something that when I
12 first moved here I was kind of disappointed not
13 to be able to take a train ride somewhere. You
14 know, I'm also on board with the increasing, you
15 know, desire to go green and improve our, you
16 know, ability to reduce the congestion in this
17 area.

18 The other thing, really, on my -- on my
19 list of items is that, you know, some people
20 have brought up the 69th Street transfer. And I
21 think that's an important thing to consider in,
22 you know, the overall course of the project, is
23 just, you know, I think the best thing would be
24 able to go straight into Center City to King of

1 Prussia and from King of Prussia back to Center
2 City, if possible.

3 Thanks for doing this project.

4 MR. O'MALLEY: Thank you, Eric.

5 Next we'll hear from Teresa D'Angelo.

6 MS. D'ANGELO: Hi. I'm Teresa D'Angelo, a
7 resident -- a 52-year resident of King of
8 Prussia. Moved here when I was just a baby.
9 Stayed, obviously.

10 My current home is in Valley Forge Homes.
11 We are on Powderhorn Road, the road -- someone
12 had said earlier that there's a low impact of
13 residents. Powderhorn Road is part of that low
14 impact. So as low as your number will be, I
15 don't want to be that number. So that needs to
16 be into the consideration. We need to get this
17 number down to zero, not low. We do appreciate
18 that you're looking at the other side of the
19 turnpike. If it does go through, we're hoping
20 that's where it would go, the other side.

21 But, again, as many people have said, I
22 don't think it's going to lessen the traffic
23 either. The sight of it, the sound of it, not
24 thrilled with any of that. People parking at

1 the mall to get onto the train, that's just
2 going to cause a lot more car traffic when they
3 get back to their cars and get off the train.
4 That's going to create traffic, parking issues,
5 security, all of that.

6 Again, other people are commenting on 69th
7 Street. It's gross down there. I wouldn't want
8 to transfer there either.

9 I think the only people that it's going to
10 benefit are the real estate developers, the
11 large businesses. They're the only ones who are
12 going to benefit. I don't see residents
13 benefitting from this, so I would hope SEPTA
14 could put themselves in the shoes of us
15 residents and see why the majority of us are
16 against this.

17 Thank you.

18 (Applause.)

19 MR. O'MALLEY: Thank you, Teresa.

20 Next we'll hear from Jacqueline Kamp.

21 MS. KAMP: Hello. My name's Jacqueline
22 Kamp. I'm also a very-long-time resident of the
23 township. I've been here for about 50 years. I
24 volunteer on the local planning commission, but

1 I'm speaking tonight not as a planning
2 commission member but as a resident.

3 I'm very much in favor of this transit
4 line. I think that it will be an asset to the
5 community, and I think that in -- as a resident
6 looking at the impacts on the community, one of
7 my strongest reasons for being very much in
8 favor is that I've lived here long enough that
9 I've watched the impact of the automobile
10 infrastructure on the community over the last 50
11 years, and it has not been positive. The roads
12 just keep getting wider, the traffic gets worse.
13 We make the roads wider again, the traffic gets
14 worse again. It is not a solution to continue
15 to make, quote, roads wider, traffic move
16 faster, more volume to move through town.

17 And over the course of the years that
18 we've been using that as a solution to our
19 transportation problems, the continuity of our
20 community itself has suffered. As the roads get
21 wider, they cut parts of the community off from
22 one another. They make it impossible for
23 children to walk to school.

24 And I just think that as we're looking at

1 potential pros and cons of the rail line, we
2 just need to realize that over the last 50
3 years, while the progression of the car
4 infrastructure has been gradual, it has been
5 significant and it has been detrimental, and
6 looking for new solutions that are more
7 sustainable and that meet the lifestyle
8 preferences of the younger generations coming up
9 is not only good for the economy and the
10 businesses and the environment, but it is good
11 for the residents of the township and the
12 quality of life in our community.

13 Thank you.

14 MR. O'MALLEY: Thank you, Jacqueline.

15 (Applause.)

16 MR. O'MALLEY: Next we'll hear from John
17 Boyle.

18 MR. BOYLE: Hello. My name is John Boyle.
19 I am the research director for the Bicycle
20 Coalition of Greater Philadelphia.

21 On behalf of the Bicycle Coalition, I
22 would like to offer out support for the
23 expansion of the Route 100 to King of Prussia
24 and Greater Valley Forge. Expanded high speed

1 rail service will offer more opportunities for a
2 connection to the circuit trails. In
3 particular, we recommend that the proposed 1st
4 and Moore/Convention Center Station just outside
5 of Valley Forge National Historic Park includes
6 safe bicycle and pedestrian connection to the
7 Valley Forge Trail network.

8 We also recommend that the Henderson
9 Avenue Station -- Henderson Road, excuse me, be
10 explicitly connected to the Chester Valley
11 Trail. We encourage SEPTA to closely coordinate
12 with the Montgomery County Planning Commission
13 to assure that both stations create seamless
14 connections with the Circuit Trails.

15 The Environmental Impact Statement does
16 not indicate whether or not the third track will
17 be required between the existing high speed rail
18 corridor between 69th Street and Hughes Park.
19 Portions of the unused right-of-way have been
20 proposed for a possible rail-with-trail
21 alignment for the Forge to Refuge Trail. We
22 strongly encourage SEPTA to be open to allowing
23 usage of the Route 100 right-of-way for a future
24 rail-to-trail alignment for the Forge to Refuge

Trail between Haverford and Radnor.

The PECO/1st Ave. action alternative looks like it may share the right-of-way with the Chester Valley Trail along the Hanson access road. We request that the final EIS specifically state that the future Chester Valley Trail extension will not be negatively impacted by the construction of the rail line if this alternative is chosen.

New rail cars need to include dedicated hanging bike racks, similar to those installed in Jersey Transit's River Line, to safely secure bicycles. Even SEPTA's existing N-5 rail cars on the high speed line already have space for three or four bicycles, to hold their bicycles, to store bicycles in the rear vestibule. The Bicycle Coalition of Greater Philadelphia believes that carrying bikes on rush hour trains should not be an issue unless the vehicle is standing room only.

Finally, at the 69th Street center we would like to see a more direct platform access between the Norristown High Speed Line and the Market-Frankford el. Even if an

1 across-the-platform transfer cannot be installed
2 initially, due to cost, it should be included as
3 a future option, dependent on ridership demand.
4 We also recommend that SEPTA improve upon the
5 directional signage between the two lines for
6 customers seeking to make this transfer. It is
7 not easy to discern, especially for the
8 first-time user.

9 Thank you very much.

10 MR. O'MALLEY: Thank you, John.

11 (Applause.)

12 MR. O'MALLEY: Next we'll hear from James
13 Ankers.

14 MR. ANKERS: I'm James Ankers. I'm a
15 10-year -- 11-year resident of the township.

16 I am in favor of the project, although I
17 respect and appreciate the concerns of the
18 residents who are opposed.

19 I grew up in a home with regional rail
20 running directly behind the house, maybe about
21 50 yards away. There were railroad crossings
22 nearby, so we had the horn blowing a great deal.
23 All in all, we found, as well as our neighbors
24 found, it was worth it to have this nearby

1 access, about a half mile, to a station. With
2 that said, those who suffer any economic losses,
3 from whatever the final implementation of this
4 project may be, should be fairly compensated.

5 My teenage son has a learning disability
6 that is not severe enough for him to never have
7 a job, but severe enough that he may never be
8 able to safely operate a car. Having a nearby
9 rail option could end up being the thing that
10 opens up more employment opportunities for him
11 outside the township.

12 Following the development of the most
13 balanced plan, every effort should be made to
14 complete the project while working to minimize
15 the negative impact on homes closest to the
16 line.

17 MR. O'MALLEY: Thank you, James.

18 Next we'll hear from Dan Klein.

19 MR. KLEIN: Good evening. My name is Dan
20 Klein, and I'm a resident.

21 I want to express my support for the King
22 of Prussia Rail Project for the following three
23 reasons: It has the potential to add up to 10
24 percent in value to homes within three miles of

1 each station; it would be a great alternative to
2 our congested local roads; and it provides
3 environmental benefits.

4 I advise SEPTA to continue to work with
5 regional and local stakeholders to find common
6 ground in order to see this project through to
7 completion.

8 Thank you.

9 MR. O'MALLEY: Thank you, Dan.

10 Next we'll hear from Sarah Burke.

11 MS. BURKE: Good evening. My name is
12 Sarah Burke. I've been a resident of King of
13 Prussia for 12 years now, and I'm here because
14 I'm against the Locally Preferred Alternative
15 for the King of Prussia Rail.

16 The reason I am against it is because it
17 is going to affect many residents, specifically
18 those in the Valley Forge Homes neighborhood.
19 And so I implore all of you, even those of you
20 who are for the train, to please state that you
21 are for the design option that brings the train
22 on the north side of the turnpike, so it does
23 not affect the residents of Valley Forge Homes.

24 I also want to dispute the notion that it

1 is going to raise property values in King of
2 Prussia. There's several reasons I believe
3 this. One of the reasons is because there are
4 studies that have been done specifically
5 involving light rail -- so, not regional rail
6 but light rail -- and they say that in order for
7 property values to increase, homes have to be
8 within a quarter to a half a mile of a station,
9 and usually the biggest property value increase
10 is within a quarter of a mile of any station.

11 The current five proposed stations are not
12 within a quarter of a mile of any residence in
13 King of Prussia; so these would be the Henderson
14 Road stations, two at the mall, one at the
15 casino, and one at 1st Avenue. So current
16 residential properties would not be within a
17 quarter mile of the station.

18 Additionally, most of them, I think all of
19 them, actually, would not currently be walkable.
20 So this would require significant investment for
21 King of Prussia.

22 SEPTA states on their talking points
23 document that regional rail does increase
24 property values in towns where the rail

1 services, but the light rail, the Norristown
2 High Speed Line, is very different from the
3 regional rail. The regional rail is a one-seat
4 ride in order to get to Center City
5 Philadelphia, and the Norristown High Speed Line
6 is a two-seat ride from King of Prussia. You
7 would have to stop at 69th Street Station. And
8 so the study comparing regional rail to light
9 rail, I think it's pretty much null. It's like
10 comparing apples and oranges.

11 And then, finally, what I would like to
12 say is that there are currently already three
13 stops concerning the Norristown High Speed Line.
14 The previous speaker, he said that those within
15 three miles of the station would see property
16 value increases, but there -- all of the homes
17 in King of Prussia are already within three
18 miles of the Norristown High Speed Line, and so
19 this would not increase our property values.

20 Thank you.

21 MR. O'MALLEY: Thank you.

22 Next we'll hear from Nick Church. Nick
23 Church? I assume that Nick is no longer willing
24 to speak.

1 Nick was the last speaker that I have on
2 my registration list, so at this point we will
3 close this hearing, and I thank you all for
4 coming.

5 (Whereupon, the public hearing was
6 concluded at approximately 7:13 p.m.)

7 - - -

C E R T I F I C A T I O N

I, Krista L. Schultz, hereby certify
that the foregoing is a true and correct
transcript of the proceedings held in this
matter, as transcribed from the stenographic
notes taken by me.

KRISTA L. SCHULTZ
COURT REPORTER

(This certification does not apply to any
reproduction of this transcript, unless under
the direct supervision of the certifying
reporter.)

SOUTHEASTERN PENNSYLVANIA TRANSPORTATION AUTHORITY
DRAFT ENVIRONMENTAL IMPACT STATEMENT
KING OF PRUSSIA RAIL PROJECT

* * * *

Monday, November 13, 2017

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SEPTA OPEN HOUSE, PRIVATE ORAL COMMENTS,
held at the DOUBLETREE HOTEL VALLEY FORGE, 301 West
DeKalb Pike, Jefferson Ballroom, King of Prussia,
Pennsylvania, 19406, commencing at 5:00 p.m., on the
above date, before Ronald DeShields, Registered
Professional Reporter and Notary Public.

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2 A P P E A R A N C E S:

3 Cichy Melanie
Thomas Philips
4 William Metzler
John Paciello, II

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MS. MELANIE: My name is Cichy Melanie. I've been a resident of King of Prussia for seven years. I love public transportation, but this proposed rail is a bad fit for this community. There are several problems that I have with this plan.

The first problem is poor planning with Town Center. There's a missed opportunity with connecting to the Town Center. Uh, there's many apartments being built there, and they are completely offset from the rail itself.

The second problem I have is the actual destination of the rail. Rather than going into Center City this line goes to 69th Street, which forces transfers to even get to downtown areas. As a resident here in King of Prussia it's easier for me to drive to Radnor or Paoli and jump on the Paoli/Thorndale Regional Rail Line to get right into the city or get to the airport.

This extension is not for the residents, it's for the businesses. But we would have to deal with -- we the residents would have to deal with the construction, the extra noise from the

1 trains, and the eyesore running through our
2 community.

3 Some -- an issue not addressed at all
4 that I've seen is the plans for the ever
5 increasing need for parking. Have you ever been
6 to the mall during Christmastime, there's no
7 parking already.

8 The fourth problem I have is, where are
9 the finances coming from? The government grants
10 that were -- are told to be paying for the -- for
11 a portion of the rail do not cover the entire sum,
12 so who is expected to pick up the rest of the
13 bill?

14 Just to show how inefficient this line
15 would be for my personal needs, I have mapped out
16 the ability for me to get from my house to the
17 Airport Line. Using the Paoli/Thorndale Line I
18 drive to Radnor, which takes me about 15 minutes.
19 From there I jump on the train at Radnor Train
20 Station, and it takes me 30 minutes to get to 30th
21 Street Station, where I can transfer easily to the
22 Airport Line. It takes about 64 minutes from
23 my -- leaving my house to getting to the airport,
24 and it costs \$9.25.

1 If I were to take the Norristown High
2 Speed Rail, the same, starting in Norristown,
3 because there's no proposed stop yet in King of
4 Prussia, it would take a five to ten-minute drive
5 and park time to get to the train station.

6 Then I would have to take the Norristown
7 High Speed Rail from Norristown to 69th Street,
8 which takes 34 minutes. I would have to transfer
9 to the Market-Frankford Line, which would take me
10 into Center City, which would be about another 13
11 minutes.

12 I would have to then walk from the
13 Market-Frankford Line to the Airport Line, which
14 is about a five-minute walk, and then, again,
15 18-minute trip to the airport. Totalling
16 approximately 70 minutes, and the cost of \$9.75
17 through the Quick Trip, which would cost \$2 for
18 the Norristown High Speed Rail, a dollar transfer
19 to the Market-Frankford, and then \$6.75 for the
20 Zone Four airport parking -- airport ticket.

21 What this doesn't account for is the
22 waiting time for the transfers, or the extra time
23 on the Norristown High Speed Rail from the actual
24 starting point, which isn't determined yet.

1 Some other questions I would have that
2 haven't been addressed, will the new stations have
3 ticket booths to cut down the cost of me
4 purchasing a ticket? Will parking cost money?

5 That's it.

6 MR. PHILIPS: My name is Tom Philips. I
7 thank you for allowing me to speak today.

8 Uh, I'm interested in the proposed rail
9 system. I think it is a huge misuse of money. I
10 can't picture that it does anything better than
11 what we already have.

12 The proposed rail is a spur off of the
13 Main Line, uh, High Speed Line. The word they
14 often use upstairs is "extension". And I notice
15 now, since I've pointed it out to them, they call
16 it a spur/extension. There is absolutely no such
17 thing as a spur/extension. You can have
18 extensions, which lengthen the line -- rail line
19 on either end, one end or the other or both ends,
20 or you can have a spur, which is something taken
21 off the middle of the High Speed Line, which is
22 what this is. It's a spur.

23 It's very seldom used in transit because
24 it is so inefficient and impractical. What the

1 spur will do is double the length of time between
2 trains that ultimately reach King of Prussia.
3 You can have a train leaving 69th Street every,
4 uh, 10 minutes, and if you have one train going to
5 King of Prussia, and the next one going to
6 Norristown, and the third one going back to King
7 of Prussia, and so on, the length of time between
8 trains in King of Prussia is 20 minutes, just by
9 definition.

10 The buses -- we already have a bus line
11 in King of Prussia, the 99 Bus. It comes from
12 Phoenixville, but it stops at the, uh, Casino. It
13 stops a couple of stops down 1st Avenue, the
14 business park, and there's a couple of stops in
15 the shopping center, the mall. And then it goes
16 down 202 -- or up 202, I guess it technically is,
17 and stops at King Manor Rail Station on the High
18 Speed Line.

19 I don't think that the proposed train
20 will get you there down to 69th Street any faster
21 than the 99, plus King Manor stop. In fact, I
22 think that the 99 King Manor Stop High Speed
23 Line will be faster, because there's only 10
24 minutes between trains -- between the bus and the

1 train.

2 Uh, the -- a couple of other things that
3 I'm concerned about is the -- with the High Speed
4 Line you have a proposed bridge going over the
5 bridge on 202. So, we have a bridge going over
6 the Turnpike, and then we got another bridge going
7 over all of that. I think that's a horrendous
8 piece of engineering. I mean, that's -- that
9 means you haven't really thought things out,
10 because there's always a way around without having
11 to stack bridges. And I see also that you're
12 crossing the Turnpike twice, which I think also is
13 a, um, misuse of funds.

14 I know there's a huge chunk of money
15 already given by the Federal Government, and you
16 got to match it. And the latest I've heard, now
17 they expect \$500 million to come from the State
18 of Pennsylvania. I have no idea in the world how
19 they're going to get \$500 million out of
20 Pennsylvania. That means that we just add another
21 billion to the debt, I guess, and move on.

22 And then there's been some promises made
23 with this, in passing, that are impossible to
24 meet. One of them was that the High Speed -- the

1 proposed train, 69th Street, Market El, uh, will
2 get you to Philadelphia an hour quicker than you
3 can get going down, uh, on the 125 Bus.

4 Since you look at the schedule the 125
5 Bus, in some cases, takes less than an hour to get
6 there, all the way down the Schuylkill. And in
7 the worst case it's 70 minutes. It's just a
8 little bit longer than an hour. I know that
9 during three o'clock to six o'clock in the
10 afternoon the traffic is a little bit slower, but
11 it's nowhere near where you can get there an hour
12 faster than you can on the 125.

13 I thank you for your time and your
14 consideration. I know that we're fighting an
15 awful lot of monied people with the Business Park
16 and the Casino and the Mall, but, uh, this is a
17 beautiful little town, we don't need bridges over
18 202, and we don't need, uh -- don't need a High
19 Speed Line. It's just an extravagant use of
20 money.

21 Thank you.

22 MR. METZLER: Good evening. My name is
23 Bill Metzler, I live at 524 Kingwood Road, that's
24 in the Valley Forge home section of the township.

1 I'd just like to go on the record and
2 say that while I am against this rail, I really
3 feel that it would go a long way with the
4 residents if we could see this rail over on the
5 Service Plaza side of the Turnpike.

6 It would really, I think, help the
7 neighbors, help the residents. A lot of those
8 people have been in their homes since the 1950s,
9 and for this rail to come through now and put them
10 out is just wrong.

11 I know it's an additional expense to
12 SEPTA, from what I understand from the last
13 meeting, but, again, I think it would really go a
14 long way with the residents if this could be
15 placed on the Service Plaza side.

16 Thank you.

17 MR. PACIELLO: Hello. My name is John
18 Paciello, II. I'm here about the King of Prussia
19 Rail meeting.

20 I am against this rail, because, uh,
21 they would like to take out either the
22 (unintelligible) Memorial, or the firehouse, and
23 currently they have -- they do not have adequate
24 funding for this project. They've already

1 stated -- SEPTA is running this as a loss, they
2 said they don't make any money off of this, so why
3 do they need to spend the money off this, in
4 previous meetings when I've been to.

5 I disagree with the route. It's not
6 going to help traffic, it's going to not improve
7 anything. It's not good for the community,
8 because it will -- it will make -- sorry. It will
9 make the -- it'll make traffic, uh, more -- cause
10 more traffic, because people have to get around
11 this thing driving different ways, and they will
12 be doing road diets on 1st Avenue to foot -- to
13 shoehorn this thing in, and I don't agree with
14 that.

15 So, and there's no stations near any
16 residential homes, so it's not going to -- it's
17 not good for the local people of the township. It
18 doesn't benefit King of Prussia one bit, it
19 only benefits the people coming from outside of
20 King of Prussia to King -- outside, from the
21 Philadelphia area into King of Prussia. So, it's
22 a one-way. We're giving up, and people from
23 outside our community are taking it.

24 I don't agree with it, and they need to,

1 uh -- this is why I'm against the rail. I don't
2 believe in it, and I don't think -- I feel like
3 the politicians and SEPTA are pushing this down
4 our throat, something we didn't ask for.

5 If it was direct Regional Rail
6 connecting the R5 Line into Norristown that would
7 be a different story, where it can help people
8 versus -- because people are not going to want to
9 take a, uh -- a, uh, a rail line from -- from
10 the, uh -- or use the KOP Rail to connect to a
11 SEPTA Regional Rail to go into Philadelphia. They
12 would rather drive to a Regional Rail station at
13 the very least, and use that.

14 So, I don't see this as improving
15 anything in here, it's just causing more gridlock
16 and more problems. Plus, we have to then bring in
17 more police and fire, and our fire department's
18 volunteer, and you want to move the firehouse,
19 that doesn't make sense.

20 So, go find another city to ruin,
21 please. And, uh, thank you very much for your
22 time.

23 This is John Paciello again, II.
24 Again, I -- the other thing is, I just moved to

1 Delaware County. I've ridden the King of Prus --
2 not the King of Prussia Rail, but the rail line
3 that goes from Upper Darby to Norristown. And
4 it gets worse as you get closer to Upper Darby.
5 And the condition of the tracks and everything
6 it's just -- it looks terrible. And I'm afraid
7 that's what's going to happen to King of Prussia,
8 it's not going to be maintained. Who's going to
9 be maintaining the infrastructure? SEPTA can't
10 upkeep the infrastructure that they currently
11 have, it looks like garbage.

12 And people lay -- throw trash around
13 it. So why do it, because you can get more money
14 and funding. That's all it's worth to you guys,
15 is money.

16 Uh, to us it's an eyesore. We don't
17 need this.

18 * * * *

19 (Whereupon, the private oral
20 comment session of the hearing concluded
21 at 6:00 p.m.)

22 * * * *

C E R T I F I C A T E

- - - -

I hereby certify that the testimony and the proceedings in the foregoing matter are contained fully and accurately in the stenographic notes taken by me, and that the copy is a true and accurate transcript of the same.

Ronald DeShields, Notary Public

The foregoing certification does not apply to any reproduction of the same by any means unless under the direct control and/or supervision of the certifying shorthand reporter.

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SOUTHEASTERN PENNSYLVANIA TRANSPORTATION AUTHORITY
DRAFT ENVIRONMENTAL IMPACT STATEMENT
KING OF PRUSSIA RAIL PROJECT

* * * *

Monday, November 13, 2017

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SEPTA OPEN HOUSE, PUBLIC MEETING, held
at the DOUBLE TREE HOTEL VALLEY FORGE, 301 West DeKalb
Pike, Jefferson Ballroom, King of Prussia,
Pennsylvania, 19406, commencing at 2:00 p.m., on the
above date, before Ronald DeShields, Registered
Professional Reporter and Notary Public.

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A P P E A R A N C E S:

JOSEPH O'MALLEY, HEARING EXAMINER
LIZ SMITH, DIRECTOR OF STRATEGIC PLANNING AND
PARTNERSHIPS

Gerry Sweeney
Keith Orris
Nick Frontino
Ansel Sauter
Scott Brown
Caroline Broyce
Pamela Halem
Emma Levering
Kamali Alloway
Eric Pearson
Howard Laurie
Bob Hart
Tom Philips
Jim Jones
Anita Nardone
Martin Ross
Leslie Snyder
Jim Holak

* * * *

MS. SMITH: It's two o'clock, so we're going to go ahead and get started.

Thank you for coming out today for the first public hearing for the King of Prussia Rail Draft Environmental Impact Statement release.

My name is Liz Smith, I'm the Director of Strategic Planning and Partnerships at SEPTA, and Project Manager for this project. We have a very short presentation for you today before we will receive public comment.

Quickly, we'll go through background on the project, as well as the proposed action. We'll talk a bit about the Draft Environmental Impact Statement itself. We'll talk about the Action Alternatives considered. We recommend Locally Preferred Alternative, as well as the design options that were recently introduced into the DEIS.

We'll then talk about the findings, distribution, comment period, the format of this public hearing, as well as some ground rules when providing oral comment.

So, a quick background on the project.

1 This is SEPTA's current system now. The purple
2 star that you see represents the King of Prussia
3 area. It is not currently served by rail, it is
4 served well by bus, with six bus routes, and
5 almost 6,000 riders per day. However, that bus
6 service is among the most worst performing in our
7 system due to the traffic conditions that exist
8 along the Schuylkill Expressway, as well as the
9 study area itself. And it results in low on-time
10 performance and long trip times for our
11 passengers.

12 As a result, we are looking at an
13 extension of the Norristown High Speed Line, shown
14 here on this map. It runs from 69th Street up to
15 the Norristown Transportation Center.

16 We're proposing a spur/extension, as
17 you can see here on the dotted line. This line
18 will connect into the 69th Street Transportation
19 Center, where a transfer to the Market-Frankford
20 Line can be made to continue travel into
21 University City and Center City, and it will be a
22 one-seat ride from 69th Street out to King of
23 Prussia, as well as to and from Norristown.

24 The DEIS document considers five Action

1 Alternatives, or if you've been to previous public
2 meetings they were termed Build Alternatives.
3 These various alternatives utilize public rights
4 of way, utility rights of way, to connect
5 from the existing Norristown High Speed Line to
6 key destinations within the study area.

7 In March of 2016 we presented a
8 recommended Locally Preferred Alternative to the
9 public for comment. This alternative is shown
10 here on the map, and referenced in the DEIS as
11 the PECO Turnpike 1st Avenue Alternative. It has
12 five station stops. It's a total length of four
13 and a half miles, and a total capital cost of
14 between 1.1 and \$1.2 billion, with a total
15 of 9500 additional riders per day.

16 Following those March 2016 public
17 meetings we held a lot of additional public
18 involvement events with those that had expressed
19 concern with the alternative during those
20 meetings, which has resulted in two additional
21 design options that have now been brought into the
22 Draft Environmental Impact Statement.

23 The first is termed the PA Turnpike
24 North/South Option, and this is based upon

1 community feedback, particularly from the two
2 residential neighborhoods adjacent to the
3 Turnpike, in order to reduce impacts to their
4 neighborhood.

5 The second is the 911 Memorial Avoidance
6 Option. This option seeks to reduce impact to the
7 911 Memorial located adjacent to the firehouse.
8 This was also based upon community feedback, as
9 well as concerns expressed by the King of Prussia
10 Volunteer Fire Company. To be clear, this design
11 option has not been approved or endorsed by the
12 King of Prussia Volunteer Fire Company, and we are
13 committed to continuing to work with them as the
14 project moves forward.

15 This map here shows where the design
16 option is different from the originally proposed
17 recommended Locally Preferred Alternative for the
18 PA Turnpike North/South Option. And this shows
19 where the alternative is different from the 911
20 Memorial Avoidance option.

21 The DEIS document evaluated
22 effects of the five action alternatives and two
23 design options in several categories. Including:
24 Transportation and traffic, land use and economic

1 development, community facilities, property
2 acquisitions and displacements, parks and
3 recreational land and open space, historical and
4 archaeological resources, visual effects, air
5 quality, noise and vibration, natural resources,
6 contaminated and hazardous material, energy use,
7 and utility investment.

8 We will not go through the details of
9 those findings in this hearing today, to make sure
10 we can maximize the amount of time the public has
11 to provide comments, but you can access the Draft
12 Environmental Impact Statement in its entirety,
13 as well as the Executive Summary on the project's
14 website at [www, dot, King of Prussia Rail, dot,](http://www.kopr.com)
15 [com.](http://www.kopr.com) Or you may also find hard copies in three
16 library locations within the region. At the Upper
17 Merion Township Library, at the Montgomery County
18 Norristown Public Library, and at the Upper Darby
19 Township Free Public Library on Bywood Avenue.

20 The comment period for the DEIS runs
21 through Monday, December 4th, and comments can be
22 made in several ways. You can submit comments
23 directly through the project's website, again, at
24 [www, dot, King of Prussia Rail, dot, com.](http://www.kopr.com) You can

1 send E-mail comments to info at King of Prussia
2 Rail, dot, com. You can submit comments in
3 writing to KOP Rail Project mailbox, C/O
4 McCormick/Taylor Incorporated, attention ECW, Two
5 Commerce Square, 2001 Market Street, 10th Floor,
6 Philadelphia, Pa. 19103.

7 And, of course, you can make public oral
8 comments at the meeting today. We also have a
9 room available downstairs if you prefer to make
10 private oral comments.

11 I do want to stress that all of these
12 comment methods hold equal weight. So whether you
13 submit a written comment, an E-mail comment,
14 submit a comment through the website, or provide a
15 comment orally today, they all hold the same
16 weight for our consideration within the comment
17 period.

18 The format of today's public hearings,
19 we started with an open house, which ran from 1:00
20 to 2:00 in the adjacent room. I do also want to
21 be clear that discussions that were held during
22 that open house are not part of the official
23 comment record. So if you had a conversation
24 with a team member, we do urge you to fill out a

1 comment card summarizing your comments to make
2 sure it's considered.

3 We have private oral comments, as I
4 mentioned, downstairs, that can be made to a
5 separate stenographer, that are also part of the
6 comment period record. And, of course, you have
7 written comment cards that are available out in
8 the hallway.

9 I gave a quick project overview
10 presentation, and we will now move on to the
11 public oral comment session portion of the
12 hearings.

13 I'm going to turn the mic over to Joe
14 O'Malley, who is our Hearing Officer for the day.

15 MR. O'MALLEY: Thank you, Liz.

16 As Liz stated, my name is Joe O'Malley,
17 and I will be serving as the Hearing Officer for
18 this public hearing. My job is to ensure that we
19 have an orderly and polite oral comment session.
20 I want to first review the oral comment ground
21 rules as shown on this slide.

22 We will take oral comments only from
23 people who have registered to make oral comments.
24 People will speak in the order of their names on

1 the registration sheets, with the exception that
2 elected officials will be allowed to make oral
3 presentations first. All others will follow in
4 the order of the registration sheets.

5 If you have not registered yet, and wish
6 to make oral comments during this session, please
7 go to the back of the room and register at the
8 desk.

9 We have time limits set on the oral
10 comments so that we can accommodate the greatest
11 number of people who wish to make oral comments.
12 If you are an individual who registered to make
13 oral comments, you are limited to two minutes, and
14 the two-minute duration will be timed by the
15 clock. If you represent an organization, you are
16 limited to three minutes for oral comments, and
17 the three-minute duration will also be timed by
18 the clock.

19 If you have lengthier comments, meaning
20 longer comments than the time limit will allow,
21 your comments can be provided via the other
22 methods Liz Smith has described. Please see a
23 project team representative at the table in the
24 back if you have any questions on how to submit

1 comments.

2 As Liz Smith stated, all comments,
3 whether written, oral, or electronic, are given
4 equal consideration and become part of the public
5 comment period record.

6 As you can see, we have a stenographer
7 working during this hearing to record all oral
8 comments that are being made. All oral comments
9 will become part of the public hearing record.

10 Please begin your oral comments by
11 clearly stating your name, as well as any
12 organization, if any, for the record. Since this
13 is an oral comment session for a public hearing,
14 SEPTA will not be responding to questions. The
15 time is devoted, to this hearing, for those who
16 wish to make oral comments.

17 Formal responses to questions
18 and comments made during this Draft Environmental
19 Impact Statement comment period will occur in the
20 final Environmental Impact Statement.

21 Before I call on the first speaker I
22 want to say a few words about how we are going to
23 conduct ourselves today. We will conduct
24 ourselves politely, being respectful of all

1 speakers while they are speaking, whether we agree
2 or not with what they are saying.

3 No one should be speaking or making
4 other noises while someone is making their oral
5 comments. In between speakers we will also be
6 quiet. Being quiet is not only polite, but also
7 helps the stenographer hear the comments.

8 If anyone cannot comply with being
9 polite and respectful, you will be asked to leave
10 the room. I will call each speaker up to the
11 podium. Please use the microphone when making
12 your comment.

13 I will now call on our first speaker,
14 and it will be Jerry Sweeney.

15 MR. SWEENEY: Good afternoon, everyone.

16 My name's Jerry Sweeney, I'm President
17 and Chief Executive Officer of Brandywine Realty
18 Trust. I come to you today, however, representing
19 The King of Prussia Rail Coalition.

20 I serve as Chairman of the Coalition's
21 Advisory Committee. The King of Prussia Rail
22 Coalition is an advocacy group that seeks regional
23 support for the proposed extension of SEPTA's
24 Existing Norristown High Speed Line into King of

1 Prussia. The Coalition is represented by a
2 diverse group from the Philadelphia region that
3 includes commercial property owners, elected
4 officials, residents, employees, visitors,
5 economic and job growth agencies, Chambers of
6 Commerce and more.

7 We all know that infrastructure
8 investment spurs economic development.

9 Throughout our region and around the
10 country we have seen how these investments create
11 infrastructure, jobs, fuel business expansion, and
12 ensure that our region stays competitive. The
13 King of Prussia Rail Coalition also knows that
14 transit accessible submarkets are some of the
15 strongest performing markets nationally, achieving
16 job growth, grant and development levels in excess
17 of broader market averages, further accelerating
18 economic growth.

19 Driven by demographic shifts across the
20 country, the initiatives to expand public
21 transportation have been highly successful
22 in recent years.

23 The Coalition believes that connecting
24 King of Prussia to Center City and University

1 City Philadelphia, via the Norristown High Speed
2 Line, is a critically necessary project for our
3 region to maintain its competitive advantage.

4 The Coalition also believes that King of
5 Prussia Rail will stimulate economic development
6 in the region. In fact, for every one dollar
7 invested in public transportation, approximately
8 \$4 is generated economic benefits. Nationally,
9 almost 50 percent of new commercial development is
10 taking place in transit accessible submarkets.

11 The Coalition further believes that the
12 King of Prussia Rail Project will increase
13 commercial real estate values, which will, in
14 turn, increase municipal tax revenues.

15 We also believe that the proposed rail
16 project will connect employers to a broad pool of
17 employees, and give residents easier access to
18 jobs along the route.

19 A recent study by the Economy League of
20 Greater Philadelphia said the King of Prussia Rail
21 Project will add thousands of jobs during
22 construction, and a thousand jobs annually
23 thereafter.

24 We also believe that the rail extension

1 will increase property values along the line. The
2 proposed stations will create in-market demand,
3 walkable mixed use neighborhoods around the train
4 stations. We also believe that the King of
5 Prussia Rail Project is a transformative project
6 that will increase regional mobility, reduce
7 congestion, and save citizens valuable time and
8 money.

9 This, for all of these reasons and more,
10 that I am honored to serve as the Chair of the
11 King of Prussia Rail Coalition, and why I come
12 before you today to enthusiastically represent the
13 Coalition as we spend -- as we lend our support to
14 this essential Philadelphia infrastructure
15 project.

16 More information about the King of
17 Prussia Rail Coalition can be found at KOP Rail
18 Coalition, dot, com.

19 Thank you very much.

20 MR. O'MALLEY: Thank you, Geri.

21 Next we'll hear from Keith Orris.

22 MR. ORRIS: Good afternoon. I'm Keith
23 Orris.

24 As the Senior Vice-President of

1 Corporate Relations and Economic Development of
2 Drexel University I'm pleased to offer the
3 following comments: We support the KOP Rail
4 Initiative. We're living in a unique period in
5 the Philadelphia region, where time is no longer
6 marked by a declining urban core ringing with
7 pockets of growth, but rather today we are in an
8 era of a vibrant and rebounding urban core with
9 many centers of growth.

10 To keep that positive economic
11 (unintelligible) and avoiding a reversal, we as
12 leaders and citizens of the region must ensure
13 three things are available: Job growth, quality
14 education, and a growing tax base. The one factor
15 linking these new economic imperatives is
16 transportation. And, in particular, rail
17 transportation, given our region's level of
18 instability.

19 The KOP Rail Project represents the
20 perfect type of transportation project needed for
21 Philadelphia's new era, because it will connect
22 the largest and growing employment centers in the
23 region, Center City, University City, and King of
24 Prussia. But by building this project we make

1 it possible for more of our citizens to secure
2 jobs no matter where they live.

3 It also has two other key economic
4 benefits, it reduces the commuting time of workers
5 by nearly half from Center City to King of
6 Prussia, and it reduces congestion and maintenance
7 costs for our regional road system. And, in
8 particular, the Schuylkill Expressway. As well as
9 reducing overall vehicle emissions.

10 The KOP Line also will increase
11 accessibility for our citizens to higher
12 education. Today's employers require continuous
13 training and education, causing employees to
14 embrace lifelong learning. The Philadelphia
15 region, with over a hundred degree-granting
16 institutions of higher education, has the capacity
17 to provide these educational services through more
18 frequent trains and connections to the three main
19 development centers.

20 It's also important to note that with
21 greater accessibility to jobs and education comes
22 increasing tax revenues of income and property.
23 This in -- property taxes, in particular, enhances
24 the values of property near the three centers of

1 the KOP Line. The public schools then prosper,
2 making the KOP Rail Line able to benefit an entire
3 continuum on education.

4 With greater mobility from public
5 transportation our citizens have greater access to
6 jobs. With greater access to education our
7 citizens can find higher paying jobs. With more
8 citizens working tax revenues increase, allowing
9 for investment in our public schools and municipal
10 services. And the KOP Rail Line must be seen as
11 not only a transportation project, but as an economic
12 development initiative that pays multiple
13 dividends and keeps the momentum of positive
14 growth in the City of Philadelphia and the entire
15 region continue.

16 MR. O'MALLEY: Thank you, Keith.

17 Next we'll hear from Nick Frontino.

18 MR. FRONTINO: Good afternoon. My name
19 is Nick Frontino, I serve as Managing Director of
20 Projects and Operations at the Economy League of
21 Greater Philadelphia. My remarks today are on
22 behalf of the organization.

23 We are an independent nonprofit
24 that works to address critical issues facing

1 the Philadelphia region by providing impactful
2 research, connecting diverse leaders, and
3 advancing shared solutions.

4 The Economy League's World Class Greater
5 Philadelphia Agenda, built with input from more
6 than seventeen hundred regional business,
7 nonprofit, government, labor and community
8 leaders, prioritizes strategic investments in
9 transportation infrastructure to enhance the
10 appeal of the region to residents, workers,
11 businesses, and visitors.

12 As our region's footprint has evolved
13 over time, strengthening connections between
14 Greater Philadelphia's major centers of commerce
15 and culture remains a critical priority.

16 For a region that perennially grapples
17 with expanding access to economic opportunity,
18 it's notable that we still lack a reliable and
19 direct transit connection between Philadelphia and
20 King of Prussia. Home to four point four million
21 square feet of retail space, seventeen million
22 square feet of office, industrial, and flex space,
23 and approximately fifty thousand jobs, King of
24 Prussia is Montgomery County's economic hub, and

1 the largest employment center in our region
2 outside of Philadelphia.

3 While King of Prussia's many existing
4 assets; diversity of employment opportunities, and
5 strong investment pipeline, point to a bright
6 future for the area, vehicle congestion and
7 limited transportation choices present obstacles
8 to sustain growth.

9 By providing a congestion free transit
10 connection to Philadelphia, Norristown, and other
11 destinations in Montgomery and Delaware Counties,
12 the proposed King of Prussia Rail Project will
13 help unlock the economic potential of King of
14 Prussia, and, in turn, drive growth and
15 opportunity for the region as a whole.

16 Public transportation is about more than
17 connecting people to destinations. Transit
18 investment can also shape land use and development
19 patterns, generate jobs and enable economic
20 growth, and provide environmental benefits.

21 At the Economy League we believe that a
22 shared understanding of King of Prussia's Rail
23 potential benefits is fundamental to productive
24 dialogue, so we were happy to partner with SEPTA,

1 DVRPC, and Econsult Solutions to conduct an
2 evaluation of the benefits that the project is
3 expected to bring to people and businesses in and
4 around the King of Prussia area, as well as the
5 region as a whole.

6 These benefits are numerous. Our
7 analysis estimates that around 60 percent of the
8 cost to build this project, is between \$610 and
9 \$716 million, will be spent within Southeastern
10 Pennsylvania, and support between 5400 and 6300
11 jobs.

12 Capital investment in King of Prussia
13 Rail is expected to generate between 20 and \$22
14 million in tax revenues in Pennsylvania. We
15 estimate that KOP Rail will reduce the average
16 transit trip from Center City to King of Prussia
17 by 30 minutes or more. And drivers switching to
18 transit as a result of KOP Rail will lead to an
19 annual reduction of up to 18 million vehicle
20 miles traveled.

21 Finally, development stimulated by the
22 introduction of KOP Rail is expected to add
23 between 540 and \$946 million to the assessed value
24 of King of Prussia real estate over 20 years.

1 These are just a few of the benefits we
2 anticipate will improve to the area as a result of
3 investment in KOP Rail.

4 Investing in Greater Philadelphia's
5 transportation infrastructure will enhance the
6 appeal of the region to both businesses and
7 employees, minimize the risk of costly service
8 disruptions, and improve the system's reliability,
9 security, and safety.

10 Thank you.

11 MR. O'MALLEY: Thank you, Nick.

12 Next we'll hear from Anselm Sauter.

13 MR. SAUTER: Good afternoon. For the
14 record I am Unselm Sauter, Manager of Federal
15 Affairs for the Chamber of Commerce for
16 Greater Philadelphia.

17 On behalf of the Chamber of Commerce for
18 Greater Philadelphia I am pleased to offer
19 comments today on SEPTA's proposed King of Prussia
20 Rail Line, which would connect commuters and
21 residents to the Greater Philadelphia Region by
22 providing frequent, reliable, and safe transit
23 service to and from the King of Prussia area.

24 The Chamber is committed to supporting

1 and continuing the transformation of our community
2 into a global region that fosters economic growth,
3 attracts and retains a skilled workforce, and
4 strengthens the region's existing ind --
5 industries and institutions.

6 Investments in transportation
7 infrastructure through specific projects of
8 regional and national importance will help Greater
9 Philadelphia achieve these goals and firmly place
10 itself as a world class region.

11 The future of Greater Philadelphia is
12 bright. We are a thriving metropolitan area that
13 offers unparalleled global access of well placed
14 geographic position, an outstanding talent pool,
15 a future market of customers, and incredible
16 quality of life.

17 So much of this is due to our existing
18 transportation infrastructure strategic economic
19 access that places us above so many other metro
20 areas. Yet, still our region is changing so
21 quickly that new transportation investments are
22 critical to accommodate and accelerate such
23 outstanding development.

24 With this in mind, the CEO of Council

1 for Growth and Council for the Chamber of Commerce
2 of Greater Philadelphia recently worked with
3 public and private partners to develop a plan
4 called Connecting The Region, a Transportation
5 Strategy for Greater Philadelphia.

6 This strategic portfolio of
7 interconnecting transportation projects identifies
8 nine key infrastructure investment areas that are
9 likely to accelerate development and
10 (unintelligible) general growth, and transform our
11 region.

12 The proposed strategy maximizes the
13 benefit to our region's economic economy,
14 mobility, and (unintelligible). The King of
15 Prussia Rail project is one of nine project areas
16 that we see as critical to the continued
17 development of our area.

18 As the largest commercial center in
19 suburban Philadelphia for employees and visitors,
20 King of Prussia lies currently separated from the
21 City of Philadelphia's largest employment centers;
22 Center City and University City.

23 King of Prussia Rail will not only
24 connect these buses with reliable and timely rail

1 service, but it would also accelerate job growth
2 and employer investment.

3 Our Chamber and its leadership believe
4 firmly in the importance of this project. We
5 applaud Jerry Sweeney, President and CEO of
6 Brandywine Realty Trust, for leading the KOP Rail
7 Coalition forward as its Chair.

8 The Coalition seeks to build support
9 from elected officials, employees, commercial
10 property owners, local businesses, residents and
11 visitors for the proposed project.

12 Chamber's President and CEO, Rob
13 Wonderling, is honored to serve on the KOP Rail
14 Coalition Advisory Committee, alongside the
15 Chamber's Chairman, John Fry, President
16 of Drexel University, and so many of the great
17 regional leaders.

18 The Chamber of Commerce, for all these
19 reasons and more, enthusiastically endorses the
20 King of Prussia Rail Project.

21 Thank you.

22 MR. O'MALLEY: Thank you.

23 Next we'll hear from Scott Brown.

24 MR. BROWN: My name is Scott Brown, I'm

1 Chair of the Montgomery County Transportation
2 Authority.

3 I live in Hatfield, adjacent to the new
4 and improved Fortuna Station, and the folks in
5 Hatfield are excited about that.

6 If Fortuna -- that can do for
7 Hatfield, I can't imagine what this new project
8 can do for King of Prussia.

9 The Montgomery County Transportation
10 Authority is a nine-member board created by the
11 Montgomery County Commissioners to help improve
12 the County's transportation assets. Our board is
13 a mix of citizens from many corners of the County,
14 all of whom recognize the crucial role that
15 our roads, bridges, trails, and public transit
16 plays in giving our County residents economic
17 opportunity and freedom of choice.

18 Last week our board approved a
19 resolution supporting the KOP Rail Project. That
20 resolution is forthcoming. It is obvious to all
21 of us that connecting Upper Merion, the largest
22 employment center in the Philadelphia suburbs, and
23 the third largest in the region, to Center City
24 and University City, is an obvious choice.

1 Some of the region's biggest
2 attractions; the King of Prussia Mall, the Valley
3 Forge Casino, and Valley Forge National Park, make
4 vital connections. This is what public transit is
5 meant to do, take people to where they actually
6 want to go. The alignment proposed in the Draft
7 EIS, from the Locally Preferred Alternative, is
8 clearly the best option.

9 As I said, it goes directly to the
10 places that most people want to go. It also
11 serves a large business park with major national
12 companies that the Upper Merion Township
13 supervisors recently voted up some for more
14 density and diverse uses.

15 It affects the fewest number of homes
16 and businesses, and has the least amount of
17 visible impact on the community, as the Draft EIS
18 notes.

19 Fundamentally, this project will improve
20 the economy of the region, improve our quality of
21 life for our residents, reduce existing congestion
22 in the area, reduce travel times for commuters,
23 reduce community cost, will have a huge
24 environmental impact, fewer cars, less carbon

1 footprint, which transcends all boundaries,
2 enhances real estate values in the region,
3 provides travel options for seniors, people with
4 disabilities, and people without cars, and bicycle
5 users.

6 The Montgomery County Transportation
7 Authority urges the FTA to issue a record
8 decision, and to grant approval for the KOP Rail
9 effort to enter project development.

10 Thank you very much.

11 MR. O'MALLEY: Thank you, Scott.

12 Next we'll hear from Caroline Boyce.

13 MS. BOYCE: Good afternoon. My name is
14 Caroline Boyce, and I am Chair of the Board of 10
15 Thousand Friends of Pennsylvania. We are the
16 leading independent nonprofit voice for great
17 places to live and work in Pennsylvania.

18 Our expertise --

19 AUDIENCE MEMBER: Speak up.

20 MS. BOYCE: Our expertise is in the
21 intersection of various issues that affect
22 community quality of life, including land use,
23 community and economic development,
24 transportation, and public infrastructure.

1 We strongly support the construction and
2 timely completion of the King of Prussia Rail
3 Extension. This inclusive, multi-modal
4 transportation vision will help transform the King
5 of Prussia area from a modern eccentric community,
6 to a healthy transit-oriented development
7 community with a host of valuable benefits for the
8 whole region.

9 It will directly connect the three most
10 important job centers in Philadelphia; King of
11 Prussia, University City, and Center City. The
12 proposed rail extension will provide mobility
13 options for residents and visitors alike. Key
14 benefits will include improved reliability over
15 bus service, reduce commute times, reduce
16 traffic congestion, with an anticipated 18 million
17 fewer vehicle miles traveled on area roads,
18 reduced emissions and cleaner air.

19 It will also better accommodate the
20 needs and preferences of seniors, persons with
21 disabilities, and young people and millennials.
22 It will mean increased access to valuable
23 destinations, including medical centers,
24 educational institutions, shopping, dining,

entertainment venues, and places of work.

Numerous studies establish that commercial property values, the local tax base, as well as private home values and marketability, will be improved and increased by the rail line extension.

The rail extension investment will also act as a multiplier, generating economic activity. Studies show that investments in public transit generate almost four times the cost of an economic activity benefit.

10 Thousand Friends supports the recommended Locally Preferred Alternative with the options. This route has incorporated realignments and related mitigation efforts to date, provides all the benefits identified previously, addresses neighborhood issues and concerns, and mitigates against further environmental impacts.

We urge incorporation of additional design and infrastructure improvements in communities along the rail line extension corridor to address impacts and capitalize on opportunities to improve quality of life for all residents. These include things such as sidewalks, street

1 lighting, bicycle lanes and walking trails,
2 transit stop and station improvements, as every
3 transit rider is, for some part of their trip, a
4 pedestrian.

5 10 Thousand Friends strongly supports
6 the KOP Rail Extension. This important project
7 should move forward as quickly as possible.

8 Thank you.

9 MR. O'MALLEY: Thank you, Caroline.

10 Next we'll hear from Pam Halem.

11 MS. HALEM: Hi, my name is Pamela Halem,
12 I am representing the Valley Forge Home Civic
13 Association. I also sit on the community working
14 group that SEPTA has created for us to --

15 AUDIENCE MEMBER: We can't hear back
16 here.

17 Can you turn up the volume, please.

18 MS. HALEM: I sit on the Community
19 Service Working group that SEPTA has created so
20 that we can have open discussions.

21 What I want to first say is that we are
22 vehemently against the high speed rail being built
23 in our backyards as planned in the recommended
24 LPA, the original design.

1 SEPTA has been kind enough to give us an
2 alternative, which is the Norristown option. If
3 this project goes through that is what we would
4 want the option to be, is to go on the North/South
5 Option so it does not go behind our 29 homes in
6 our lovely little community.

7 Secondly, we have met several times with
8 SEPTA to discuss our concerns, and most of them
9 are safe -- like safety-based questions regarding
10 construction, as well as when the train -- if the
11 train is, uh -- if it goes through how it will
12 proceed and be safe.

13 One of my neighbors brought up something
14 to me earlier, and it's very disturbing for us, so
15 we would like some questions answered.

16 She did some research, and it came to
17 light that AECOM, the engineering firm, working on
18 this particular project did bad work for SEPTA
19 back in 2009. There was a complaint for a lawsuit
20 that was successful online on Philly -- Planned
21 Philly, dot, com, where SEPTA claimed that AECOM
22 was negligent in their -- in their design. Um,
23 that if they had pro -- proceeded with the design,
24 um, a train would have run into a wall, based on

1 their engineering, so we would like to know and
2 have this addressed in the DEIS, why they're using
3 the same engineering company that SEPTA claimed
4 caused increased construction costs, design
5 errors and delays. It also, uh, made SEPTA have
6 to pay out \$10 million in settlement fees to all
7 those subcontractors on that particular project.

8 The suit alleges the firm's design
9 clause would have endangered the safety and
10 welfare of SEPTA's ridership, the surrounding
11 community, and members of the public.

12 So, we want to know why AECOM was
13 brought on this project to help plan it in the
14 first place, knowing its past mistakes. And what
15 SEPTA will do to ensure the safety of the public
16 will be in the forefront of their designs going
17 forward.

18 We would also like to know how SEPTA
19 will qualify the chosen engineering company that
20 will complete the design. Furthermore, we would
21 like a commitment from SEPTA to use the most
22 technologically advanced rails, cars, and
23 construction techniques available at the time of
24 construction that will reduce vibration, sound,

1 and visual impact in our community.

2 Thank you.

3 MR. O'MALLEY: Thank you, Pam.

4 Next we'll hear from Emma Levering.

5 MS. LEVERING: My name's Emma Levering,
6 and I'm a resident of Valley Forge Homes, where
7 Pam also lives. My statement is short and sweet.

8 I have many concerns about this
9 project, uh, but obviously it is heavily backed by
10 business and transportation issues or --
11 whatever.

12 Uh, I want to address the North/South
13 Option. I really want to urge SEPTA to look at,
14 uh, making the line, as it goes behind our
15 development, be on the Service Plaza side of the
16 Turnpike. It seems that this project is going to
17 be the most benefit to business and, um, that is
18 the side of the Turnpike where the businesses are.
19 If it comes on the south side it's going to
20 impinge on many residential properties. And, uh,
21 I really do not want to see that happen.

22 Thank you.

23 MR. O'MALLEY: Thank you, Ms. Levering.

24 Next we'll hear from Kamali Alloway.

1 MR. ALLOWAY: Kamali Alloway, I'm
2 with the Clean Air Council. I am representing
3 them today.

4 Clean Air Council strongly supports King
5 of Prussia Rail Extension of the Norristown High
6 Speed Line. Clean Air Council has worked for 50
7 years to protect everyone's right to breathe air.

8 This project will improve air quality
9 and public health for all of the residents in the
10 Greater Philadelphia region and (unintelligible).
11 The transportation sector is one of the largest
12 contributors to US greenhouse gas emissions and
13 pollutants, making it difficult for the region to
14 maintain the Federal Health Standard for ozone
15 particulate.

16 King of Prussia is a major regional
17 employment center drawing commuters from the
18 surrounding counties, but it's one of the most
19 congested parts of the region. The Schuylkill
20 Expressway, which serves as a main access point to
21 King of Prussia, is the ninth most congested
22 roadway in the country. Vehicle emissions from
23 Expressway traffic greatly affect air quality.

24 The extension of the Norristown High

1 Speed Line into King of Prussia is a long overdue
2 improvement to the public transit access to this
3 hub.

4 The extension would provide a convenient
5 and much-needed alternative to the one-person,
6 one-car commute. And lessen the time and number
7 of transfers required to travel between Center
8 City, King of Prussia, and other parts of the
9 region.

10 Every rider served by King of Prussia
11 Rail will be one less car on the road, improving
12 air quality and traffic congestion for everyone.

13 And increase in public transportation
14 service will also lead to economic growth in the
15 area, as people are able to get to this employment
16 hub more easily. The rail extension will provide
17 new opportunities to serve people in Philadelphia
18 to access jobs in the King of Prussia area.

19 Thank you for considering the benefits
20 of the King of Prussia Rail Extension of the
21 Norristown High Speed Line. The Clean Air Council
22 strongly supports this project that reduces
23 congestion, and increases air quality in the King
24 of Prussia area, as well as the region as a

1 whole.

2 MR. O'MALLEY: Thank you.

3 Next we'll hear from Eric Pearson.

4 MR. PEARSON: Thank you. Good
5 afternoon. My name's Eric Pearson, I'm the
6 President and CEO of Valley Forge Casino Resort.
7 Thank you for the opportunity to address the group
8 here today.

9 Valley Forge Casino Resort is the
10 region's only full amenity gaming resort, with
11 dining, nightlife, hotel rooms, and entertainment
12 all complementing our casino operations.

13 Since opening five years ago we've made
14 significant investments throughout our property,
15 including renovating one of our hotel towers,
16 creating the Valley Beach Poolside Club and much
17 more. Just last month Governor Wolf signed
18 legislation into law to -- that allowed us to
19 remove the access restriction for our casino.
20 Hopefully these changes will result in increased
21 visitation and to remove the patron
22 (unintelligible) amenities, access restriction
23 which was a source of commute -- confusion and
24 frustration for our guests.

1 We're excited about the prospect of
2 extending rail service to destinations in King of
3 Prussia and Upper Merion Township by SEPTA's
4 Norristown High Speed Line. Not just because we
5 would be a stop near our property, but the rail
6 line provides much needed transportation service
7 and will alleviate many current issues. One of
8 them being, um, alleviating some employee
9 concerns. We have a casino, many of Valley Forge
10 Casino Resort's employees, approximately 25
11 percent, are Philadelphia residents, and travel to
12 work by bus, or some may take the train to
13 Norristown, and take the bus to our property from
14 there.

15 King of Prussia Rail would be
16 significantly more convenient, and would be -- and
17 would dramatically decrease employees' commute
18 times to work.

19 The rail line would also help decrease
20 employee turnover and fill late night shifts.
21 Contending with daily traffic congestion is
22 frequently cited as a significant reason of why
23 our employees decide to leave. The hardest shifts
24 for us to fill are late night shifts because

1 there's no, or limited access to public
2 transportation. We know the rail line will help
3 us attract and retain employees.

4 The rail line will also make it easier
5 for the public to access our property, and provide
6 more parking options. KOP Rail will provide
7 easier access for guests attending meetings,
8 conventions, concerts, and other large events.

9 Economic growth will also be spurred,
10 enabling greater opportunities to attract
11 customers to the property. Having more transit
12 connections between KOP and the region makes the
13 area more attractive to employers, and encourages
14 economic growth, which drives more business for
15 all companies in the area. And more business
16 means greater benefits to Upper Merion Township.

17 In 2013 the Township and Valley Forge
18 Casino partnered to form the Board of Community
19 Assistance, which provides financial help to
20 organizations by grants funded by the Casino to
21 benefit residents of Upper Merion and scholarships
22 for graduating high school seniors.

23 Last year, from contributions made to
24 Valley Forge, The VCA awarded over a hundred and

1 fifty thousand dollars to 65 recipients, including
2 40 organization and 25 scholarships.

3 In addition to this, there's the two
4 percent of gaming revenue that is paid to Upper
5 Merion Township as part of our local share. By
6 loosening Valley Forge Casino Resort business,
7 King of Prussia Rail will be a catalyst that
8 allows us to continue to partner and help grow the
9 community.

10 For this reason, and everything I've
11 mentioned, we support this project.

12 MR. O'MALLEY: Thank you, Eric.

13 MR. GROSSMAN: Good afternoon.

14 My name is George Grossman, I live and
15 work nearby, and I find myself in King of Prussia
16 on almost a daily basis.

17 I'm here to express my support for the
18 King of Prussia Rail Project. I know the
19 importance of King of Prussia as an important
20 transportation and commerce hub for the
21 Philadelphia region.

22 In my opinion, adding SEPTA rail service
23 to King of Prussia will help both King of Prussia
24 and our region to remain and become even more

1 economically competitive than it is today. At the
2 same time, overall quality of life will be
3 enhanced by reducing traffic congestion, and
4 providing individuals with another means of
5 mobility throughout our region.

6 In my opinion, the rail service has
7 great promise for current and future residents.
8 Increased transit options increase overall
9 property values and desirability of place. It
10 will also provide better connections to our
11 region's fine educational and cultural
12 institutions and other job centers.

13 Although -- although almost any
14 significant investment and a new public
15 infrastructure project will have some impacts to
16 nearby properties, it appears that the current
17 route, designated as the Locally Preferred Option,
18 provides a careful balance between the public
19 interest, while mitigating impacts to nearby
20 properties.

21 Based on all of these factors and many
22 others, I express my support for this project.

23 Thank you.

24 MR. O'MALLEY: Thank you, George.

1 Next we'll hear from Cameron Barrett.

2 MR. BARRETT: Thank you for your time
3 today. My name is Cameron Barrett, I'm the Senior
4 Vice-President of supply chain for CSL Global.

5 CSL is a global biotherapeutics company,
6 and we're a leader in the area of rare diseases
7 and treat (unintelligible) disorders,
8 immunodeficiencies, hereditary angioedema, and
9 respiratory disease.

10 We've been operating out of King of
11 Prussia since 2004. In 2006 we identified that we
12 were about to outgrow our sites. At that time we
13 conducted a site search where we would like to
14 locate our operation headquarters. We looked in
15 New Jersey, Delaware, and into Washington DC, and
16 at that time we decided to remain here in King of
17 Prussia, Pennsylvania.

18 We refurbished our existing space and
19 now (unintelligible) renovations. In 2012 we
20 again found ourselves outgrowing our space, and we
21 worked with our local landlord and we acquired
22 additional space. And we stand on 1st Avenue.

23 Uh, that expansion cost us \$25 million.
24 We had 25 -- 450 employees at that time. Since

1 then we've grown to a thousand employees in
2 this King of Prussia area.

3 Our company places a high degree of
4 value on our workforce and our ability to attract
5 talented personnel into this area and into our
6 company.

7 At this moment as well we're going
8 through a very rapid growth phase within our
9 organization, and so we're further looking at
10 expanding our presence here in King of Prussia.
11 We want to stay here. We have many relationships
12 in the area.

13 Right on top of the list is CHOP, Temple
14 University, and others within this location.

15 We're also active in the United Way
16 Campaign, and most recently have donated \$290,000
17 to the area. So, it demonstrates how we feel in
18 King of Prussia.

19 We have a diverse range of jobs that we
20 offer in this site, and are growing. And we're
21 looking at accounting, finance, business
22 development, support of our clinical trials,
23 basically our new drugs, marketing, medical
24 affairs, procurement, purchasing, and many

1 others.

2 During the process of implementing
3 a growth plan for this area, we (unintelligible)
4 for us to have a rail that's going to support
5 continued attractiveness at this location for our
6 staff.

7 CSL plans to be a corporate citizen for
8 many years to come, and it's on behalf of CSL,
9 I'd like to say at least off the record and hope
10 that it goes through.

11 Thank you for your time.

12 MR. O'MALLEY: Thank you.

13 Next we'll hear from Howard Laurie.

14 MR. LAURIE: My name is Howard Laurie.
15 I live on Valley Forge Road, been a resident of
16 King of Prussia since the summer of 1968.

17 The deficiency in the proposed plan is
18 that it does not serve the Village in King of
19 Prussia, which is expanding in residential and
20 commercial activity.

21 That deficiency could easily be
22 resolved, in my opinion, by not having the line
23 terminate in the vicinity of the casino, but
24 instead by making a left turn at Gulph Road and

1 extend all the way down to the building.

2 Thank you.

3 MR. O'MALLEY: Thank you, Howard.

4 Next we'll hear from Jennifer Shipman.

5 MS. SHIPMAN: Good afternoon. I'm
6 Jennifer Shipman, I'm the Director of Sales and
7 Marketing here at the DoubleTree Valley Forge.

8 AUDIENCE MEMBER: We can't hear you.

9 MS. SHIPMAN: My name is Jennifer
10 Shipman, I'm the Director of Sales at the
11 DoubleTree Valley Forge.

12 Having King of Prussia -- having the
13 King of Prussia Rail Line will modernize the city
14 and open it up to an abundance of opportunity.

15 As someone who has commuted and worked
16 in King of Prussia for 15 years, there are so many
17 positives to having the King of Prussia Rail Line.
18 It will bring new corporations that will fill our
19 hotels, our restaurants, and retail stores, which
20 will, in turn, create more opportunity for
21 employment.

22 We will be able to market to a deeper
23 list of candidates, and capture those individuals
24 who are unable to commute to King of Prussia or

1 have to take multiple transit to get here.

2 Having a rail line will help foster a sense of
3 community.

4 For example, people traveling together
5 are more likely to feel a community connection
6 than those traveling in cars and isolation.
7 Because of this the rail line will reduce
8 egregious road rage and (unintelligible) industry
9 and injuries and fatalities caused by car
10 accidents.

11 It will also significantly reduce our
12 weekday commute. King of Prussia is growing so
13 fast, and we need a rail line to support all of
14 the new developments. The King of Prussia Rail
15 Line will make King of Prussia a much more viable
16 option for social groups, corporate functions, and
17 everyday leisure travelers. It brings us
18 much closer to Philadelphia, and gives our
19 employees and clients a much easier reason as to
20 why they should choose King of Prussia.

21 MR. O'MALLEY: Thank you, Jennifer.

22 Next we'll hear from Bob Hart.

23 MR. HART: Good afternoon. My name is
24 Bob Hart, I'm the General Manager of King of

1 Prussia Mall.

2 On behalf of King of Prussia Mall
3 I'm here to support and endorse the King of
4 Prussia Rail Project. King of Prussia -- the King
5 of Prussia area -- extended area, is the largest
6 employment center in the suburban Philadelphia
7 region.

8 The King of Prussia Mall alone employs
9 over 8,000 employees. In addition, over 20
10 million people visit the mall every year. The
11 rail will make it more convenient for both
12 customers and employees to visit the mall.

13 It is projected that ridership on the
14 Norristown High Speed Line will increase by up to
15 80 percent when the rail's in operation. This
16 will help reduce congestion on our area roadways.

17 The high speed rail is a comfortable and
18 convenient way to travel. We all know what the
19 commute is like on the Schuylkill between
20 Philadelphia and King of Prussia. The High Speed
21 Line will make a great alternative, make it much
22 easier, and significantly reduce the travel time
23 from Philly to KOP.

24 The King of Prussia Rail will also help

1 our office park. Public transportation is very
2 important to office employees. With high speed
3 rail stops on 1st Avenue in the business park,
4 the high speed rail line will definitely help our
5 office park with increased occupancy and added
6 value to the community.

7 Again, we endorse this project, and
8 encourage others in the community to support it as
9 well.

10 Thank you.

11 MR. O'MALLEY: Thank you, Bob. Bob
12 was the last speaker -- sorry.

13 Next we'll hear from Tom Philips.

14 MR. PHILIPS: My name is Tom Philips. I
15 thank you for allowing me to talk today.

16 I've been living in the King of Prussia
17 area for 40 years, and I love the area. It's just
18 magnificent. And it's been growing and it's a
19 very functional and great place to live and to
20 work.

21 You're talking about a spur and an
22 extension. There is no such thing as a
23 spur/extension. You can have a spur or an
24 extension.

1 An extension is adding to the length of
2 the rail at either end, or both ends. A spur is
3 coming off from one end of the middle of the
4 main line. A spur is very seldom used in
5 transitways, because it is very inefficient and it
6 is impractical.

7 For example, if you have a, uh -- a
8 train leaving 69th Street every 10 minutes, one
9 would go to Norristown, from what I understand,
10 one would go to King of Prussia. That means that
11 every -- there would be a gap of 20 minutes
12 between trains at King of Prussia.

13 You already have a bus line, 99, which
14 is beautiful. It goes by the, um, the casino.
15 It goes through the industrial park. It stops
16 twice in the King of Prussia Mall. And it stops
17 at the King Manor High Speed Line. You can get
18 from King of Prussia faster right now on the 99
19 leaving at the King of Prussia -- I've done it,
20 and going down, than you can possibly do it on
21 the -- on the proposed High Speed Line.

22 The, um -- the cost of this 500 million
23 from the State. I don't know how they can
24 possibly come up with \$500 million.

1 Thank you very much.

2 MR. O'MALLEY: Thank you, Tom.

3 Next we'll hear from Jim Jones.

4 MR. JONES: My name is Jim Jones. I'm a
5 40-year-resident of King of Prussia. I did not
6 know this was a comment only, so I'm going to have
7 to ad-lib a little bit from my notes.

8 It is very noteworthy that most of the
9 speakers in favor of this project are not
10 residents of King of Prussia, they are outsiders.
11 And the panel that made up the -- starting with
12 the, um -- the railway trust, they're not
13 residents. They're not voters of this township.

14 We just had an election. It would have
15 been very interesting to have that on the ballot
16 to see if the residents are really in favor of
17 it.

18 Second, in terms of evaluation of the
19 homes. I doubt seriously whether the Market
20 Street El or the 69th Street Terminal have
21 increased the value of the homes in that area,
22 even though they've been there for a long, long
23 time.

24 We currently have a -- what I

1 consider to be an adequate transportation system
2 in and out of Philadelphia, which I used for 30
3 years without much problem. This rail only
4 duplicates what is already there at a monstrous
5 cost.

6 The hours of operation are going to be a
7 problem, because of the noise and, um, everything
8 else that emanate from it.

9 And, lastly, but not least, I think
10 that, um, to be -- it only appears that the mall,
11 the casino, and the industrial park benefit from
12 it not the residents, then why does anybody else
13 have to pay for it? The mall, the casino, and the
14 industrial park should be the alone payers for
15 this white elephant if, in fact, it goes through.

16 MR. O'MALLEY: Thank you, Jim.

17 Next we'll hear from Anita Nardone.

18 MS. NARDONE: Good afternoon, and thank
19 you for the opportunity.

20 My name is Anita Nardone, and I'm
21 a civil engineer and Project Manager for Dawood
22 Engineering, which is a civil engineering firm
23 located on First Avenue here in King of Prussia.

24 And I represent Bony Dawood, the owner

1 of the company, as well as the senior management,
2 in lending our support to this very vital project
3 for the area.

4 Dawood Engineering is based -- is based
5 in Harrisburg, Pennsylvania, but moved out here to
6 King of Prussia based on our work with PennDOT
7 District 6. We have grown the office, and now
8 also have an office in Philadelphia.

9 The rail extension will not only help
10 our employees service our clients in the
11 Philadelphia area as well as out here in the
12 suburbs, but also lend to the attractiveness of
13 working for a company that is easily accessible
14 by rail.

15 Upper Merion and King of Prussia have
16 been wonderful hosts to this company, and we are
17 thrilled to be here to see the rail extension as a
18 very positive contribution to the area, and we
19 lend our support.

20 Thank you.

21 MR. O'MALLEY: Thank you, Anita.

22 Next we'll hear from Martin Ross.

23 MR. ROSS: Good afternoon. My name is
24 Martin Ross, I'm a resident of King of Prussia. I

1 don't have any written notes, so I'm going to wing
2 it, excuse me, I --

3 MR. O'MALLEY: That's fine.

4 MR. ROSS: A portion of my statement is
5 in reference to the people who are not present
6 today.

7 As a resident of King of Prussia I, uh,
8 shop and dine at all of the local establishments.
9 The people who are preparing your food, the people
10 who are ringing you up at the register at
11 Nordstrom's for your shoe purchase, these are the
12 people who are not here today.

13 These are the people that I see, at
14 night driving around, waiting for the bus at all
15 different hours of the night in the dark, in the
16 rain. These are the people that will be a part,
17 who will benefit from the rail extension.

18 Um, being fortunate enough to be able to
19 purchase a car myself I don't have an issue with
20 needing the rail, but many, many people do, coming
21 in and out of the city and from different areas.

22 In a similar project; for example, a lot
23 of research was done on different impacts. The
24 Miami Rail that was done in the 1980s was

1 considered a train to nowhere. From downtown all
2 the way out to the suburbs. After completion it
3 was utilized very little, but as the suburbs
4 continued to grow, um, that rail today is full day
5 and night. Not with just your, um, morning and
6 afternoon commuters, but all day long. With not
7 only blue collar, but white collar passengers as
8 well, for everyone who does not care to sit in
9 traffic.

10 Thank you for your time, appreciate it.

11 Have a nice day, everybody.

12 MR. O'MALLEY: Thank you, Martin.

13 Next we'll hear from Leslie Snyder.

14 MS. SNYDER: Good afternoon. My name is
15 Leslie Snyder, and I live and work in King of
16 Prussia.

17 I'm a small business owner, and I moved
18 back here to the area from Florida. And I've been
19 living in King of Prussia for about two years now.

20 So, in part, right now I'm considering
21 moving back to Miami because it's very difficult
22 for my clients to reach me. They -- and also
23 employees.

24 So, I am really in favor of the rail

1 that would (unintelligible) clients and employees
2 come out to King of Prussia.

3 I'd like to also say this in Spanish.

4 * * * *

5 (Whereupon, Ms. Snyder spoke in
6 Spanish.)

7 * * * *

8 MR. O'MALLEY: Thank you.

9 Next we'll hear from John Holak.

10 MR. HOLAK: Good afternoon. My name
11 is John Holak, and I'm with the National Rail
12 and Transit Business client for Urban Engineering
13 down in Philadelphia.

14 On behalf of my colleagues at Urban I'd
15 like to thank you for the opportunity to
16 enthusiastically endorse what we consider to be
17 one of the most vital infrastructure projects in
18 the Delaware Valley in quite some time.

19 Having planned, designed, and
20 contributed to many transportation projects in the
21 region for almost 60 years, Urban is acutely aware
22 how projects like the King of Prussia Rail Project
23 Extension can enhance the region's economy,
24 mobility, and movability.

1 Conscious of the ever-present fiscal
2 and budgetary restraints facing our world today,
3 we as a community cannot accept the future where
4 our children and our grandchildren are going to be
5 confronted with an environment that failed to
6 (unintelligible) infrastructure improvements.

7 We believe the King of Prussia Project
8 will provide significant urban and economic growth
9 for the region, better access for our region's
10 residents to commute to jobs, schools, and social
11 events in King of Prussia, Center City, University
12 City, and Delaware County regions. Reduce
13 vehicular congestion, and improve air quality
14 around the wonderful urban areas surrounded by
15 this project.

16 The Philadelphia region needs to
17 support and invest in this project to help reduce
18 the burden of highway congestion that is choking
19 our ability to grow jobs and encourage economic
20 development in the region.

21 The King of Prussia Rail Extension
22 Project will play a major part in improving the
23 region's infrastructure and urban plans for
24 decades to come.

1 On a personal note, I do travel around
2 the country and I work in rail and transit, and
3 I've seen a lot of transit-oriented development
4 projects. Somebody just spoke (unintelligible)
5 Miami Project, in Los Angeles, in the Midwest,
6 deep down south, in the Northeast Corridor. These
7 kind of projects are active all over, and they are
8 really, really successful if they are developed
9 the right way.

10 So, I highly encourage the community and
11 the panel to endorse this project and take it
12 forward.

13 And I thank you for your time.

14 MR. O'MALLEY: Thank you, John.

15 I believe that John is the last person
16 who has registered to speak, so at this point we
17 will conclude this hearing.

18 And I thank you all for coming out.

19 * * * *

20 (Whereupon, the public
21 meeting concluded at 3:02 p.m.)

22 * * * *

C E R T I F I C A T E

- - - -

I hereby certify that the testimony and the proceedings in the foregoing matter are contained fully and accurately in the stenographic notes taken by me, and that the copy is a true and accurate transcript of the same.

Ronald DeShields, Notary Public

The foregoing certification does not apply to any reproduction of the same by any means unless under the direct control and/or supervision of the certifying shorthand reporter.

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PUBLIC HEARING
SOUTHEASTERN PENNSYLVANIA TRANSPORTATION AUTHORITY
KING OF PRUSSIA RAIL PROJECT

* * *

Public hearing, held pursuant to notice, at
the NORRISTOWN MUNICIPAL BUILDING, 235 East Airy
Street, Norristown, Pennsylvania, 19401, on Wednesday,
November 15, 2017, scheduled for 6:00 p.m., before
Krista L. Schultz, Professional Reporter and Notary
Public.

* * *

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I N D E X

* * *

PRESENTATION BY:

LIZ SMITH, PE, PMP - Director, Strategic Planning & Partnerships

PUBLIC HEARING OFFICER:

JOSEPH M. O'MALLEY

PUBLIC ORAL COMMENTS:

Crandall Jones

Samuel Hagopian

Louis Perugini

Bernard Dagenais

Barry Seymour

Valerie Arkoosh

Alfred Achtert

Steve Kline

Pam Forster

Alex Doty

Vanessa Schallack

Jeff DeVuono

Matt Tucker

PUBLIC ORAL COMMENTS: (Continued.)

Scott Maits

Ana Fluehr

Adam Lang

1 MS. SMITH: Hi. We're going to go ahead
2 and get started. I'm not planning on using a
3 microphone tonight, because I'm really loud.
4 But if someone can't hear me, please raise your
5 hand and let me know, and we can go ahead and
6 get me mic'd up.

7 My name is Liz Smith. I am the director
8 of strategic planning and partnerships at SEPTA,
9 and project manager for the King of Prussia Rail
10 Project.

11 We're going to do a very brief
12 presentation before we open it up to public
13 comment: We'll be covering just a very brief
14 background and overview of the proposed action;
15 we will talk a bit about the Draft Environmental
16 Impact Statement, including the Action
17 Alternatives, the Locally Preferred Alternative,
18 and the design options; and then we will talk a
19 bit about what types of findings are included in
20 the DEIS; the distribution; the comment period;
21 the format of this public hearing; and the oral
22 comment ground rules.

23 So, this is SEPTA's current system map.
24 The purple star that you see represents King of

1 Prussia. It is not currently served by rail.
2 It is served well by bus in terms of quantity,
3 there's six bus routes that access the study
4 area each day with about 5,600 riders; however,
5 those routes are some of the worst performing in
6 our system, because they are stuck in traffic
7 both on the Schuylkill Expressway as well as
8 within the King of Prussia area.

9 As such, the proposed action is to extend
10 the Norristown High Speed Line via a spur
11 extension to serve the King of Prussia area.

12 This map represents the existing Norristown High
13 Speed Line, which travels from 69th Street
14 Transportation Center in Upper Darby to
15 Norristown Transportation Center in Norristown.
16 We are proposing, as shown on the dashed line, a
17 spur where a one-seat ride would be provided
18 between 69th Street and King of Prussia and
19 back, as well as between Norristown and King of
20 Prussia and back. There is then a very easy
21 transfer at 69th Street, one stairway, to the
22 Market-Frankford Line, where you can continue
23 your travel into University City and Center
24 City, Philadelphia.

1 The Draft Environmental Impact Statement
2 considers five Action Alternatives, which are
3 shown here on the map. And the document also
4 recommends a Locally Preferred Alternative,
5 which was termed the PECO/Turnpike-1st Avenue
6 Alternative, which represents approximately
7 where the route would lie.

8 The proposed extension would be four and a
9 half miles in length with five station stops.
10 Total capital cost is between \$1.1 and \$1.2
11 billion, and we would see ridership on the
12 extension of about 9,500 people per day, almost
13 doubling ridership on the current Norristown
14 High Speed Line. It is also fully elevated in
15 nature.

16 So we presented that Recommended Locally
17 Preferred Alternative to the public in March of
18 2016, and we certainly heard some concerns. And
19 so as a result, we did some backyard visits, we
20 did some neighborhood meetings and we formed a
21 community working group, and those discussions
22 have led to the formation of two design options
23 that have been brought into the Draft
24 Environmental Impact Statement: The first is

1 the Pennsylvania Turnpike North/South Option,
2 which was created as a result of feedback and
3 concerns from area residents; and the second is
4 the 9/11 Memorial Avoidance Option, which came
5 about as a result of feedback from residents as
6 well as from the volunteer fire company. To be
7 clear, that design option has not been approved
8 by the volunteer fire department, but SEPTA is
9 committed to continue working with them as the
10 project moves forward.

11 Both of these design options are shown in
12 great detail within the open house, and if you
13 have any questions on those design options we
14 can certainly discuss them with you at the
15 plans.

16 So, this shows the area that has the
17 design option for the PA Turnpike North/South
18 Option, where we shift to the north side of the
19 turnpike through this area. And then this area
20 shows the change in alignment from the 9/11
21 Memorial Avoidance Option.

22 So, the Draft Environmental Impact
23 Statement evaluated the effects of the five
24 Action Alternatives and the two design options

1 on the following things: Transportation and
2 traffic; land use and economic development;
3 community facilities; property acquisitions and
4 displacements; parks, recreational land and open
5 space; historical and archeological resources;
6 visual effects; air quality; noise and
7 vibration; natural resources; contaminated and
8 hazardous materials; energy use; and utilities
9 effects.

10 The full Draft Environmental Impact
11 Statement as well as the executive summary can
12 be found on the project's website at
13 www.kingofprussiarail.com.

14 A hard copy of the DEIS as well as the
15 executive summary is located at three area
16 libraries; the Upper Merion Township Library,
17 the Montgomery County Norristown Public Library,
18 and the Upper Darby Township Free Public Library
19 on Bywood Avenue.

20 The comment period runs through Monday,
21 December 4th. Comments can be made in a variety
22 of ways: You can submit a comment directly
23 through the Project website, again, at
24 www.kingofprussiarail.com; you may send an email

1 to info@kingofprussiarail.com; you may mail in a
2 comment in writing to KOP Rail Project mailbox,
3 c/o McCormick Taylor, Incorporated (Attn: ECW),
4 2 Commerce Square, 2001 Market Street, 10th
5 Floor, Philadelphia, PA, 19103; and, of course,
6 you can provide either private or public oral
7 testimony at one of the three hearings, two of
8 which occurred on Monday and the last, that is
9 occurring this evening.

10 To be clear, all comments, regardless of
11 how they are submitted, whether they were
12 written, e-mailed, submitted through the
13 website, or given tonight in testimony, receive
14 equal weight within this process.

15 So the format for the hearing tonight, we
16 have already completed a one-hour-long open
17 house that ran from 5:00 to 6:00 that gave an
18 opportunity for members of the public and our
19 stakeholders to ask questions and discuss the
20 project with our project team. The discussions
21 that occurred out in the open house area are not
22 part of the formal comments during the comment
23 period, that is not an official way to comment.
24 So, if you had a conversation with a team

1 member, we do want to be clear that that was not
2 recorded as an official comment and you do still
3 need to make that comment, whether it's via the
4 website, via e-mail, via writing, or this
5 evening.

6 We will then -- I'm pretty much wrapped up
7 with the project overview presentation, and then
8 we'll move into the public oral comment session.

9 So with that, I'm going to turn it over to
10 our hearing officer, Mr. Joe O'Malley, who is
11 going to go through the ground rules for
12 providing oral comment this evening. Thank you.

13 MR. O'MALLEY: Thank you, Liz.

14 Good evening. My name is Joe O'Malley and
15 I will be serving as the hearing officer for
16 this public hearing. My responsibility is to
17 ensure that we have an orderly and polite oral
18 comment session. I want to first review the
19 oral comment ground rules as shown on the slide.

20 We will take oral comments only from
21 people who have registered to make such
22 comments. People will speak in the order of the
23 names on the registration sheets, with the
24 exception that elected officials will be allowed

1 to make oral comments first. All others will
2 follow in the order on the registration sheets.
3 If you have not yet registered and you wish to
4 make oral comments during this session, please
5 go to the open house room and register at the
6 desk.

7 We have set time limits for the oral
8 comments so that we can accommodate the greatest
9 number of people who wish to make oral comments.
10 If you are an individual who registered to make
11 oral comments, you are limited to two minutes,
12 and the two-minute duration will be timed by the
13 clock. If you represent an organization, you
14 are limited to three minutes for your oral
15 comments, and the three-minute duration will
16 also be timed by the clock.

17 If you have lengthier comments, meaning
18 longer comments than the time limits will allow,
19 your comments can be provided via other methods
20 as Liz has described. Please see a project team
21 representative at the table in the open house
22 area if you have any questions on how to submit
23 your comments.

24 As Liz Smith stated, all comments, whether

1 written, electronic or oral, are given equal
2 consideration and become part of the public
3 comment period record.

4 As you can see, we have a stenographer
5 working during this hearing to record all oral
6 comments that are going to be made. All oral
7 comments will become part of the public hearing
8 record. Please begin your oral comments by
9 clearly stating your name as well as any
10 organization that you may represent.

11 Since this is an oral comment session for
12 a public hearing, SEPTA will not be responding
13 to questions. The time is devoted to hearing
14 from those who wish to make oral comments.

15 Formal responses to questions and comments
16 made during the Draft Environmental Impact
17 Statement comment period will occur in the Final
18 Environmental Impact Statement.

19 Before I call on the first speaker, I want
20 to say a few words about how this hearing will
21 be conducted: We will conduct ourselves
22 politely, being respectful of all speakers while
23 they are speaking, whether you agree with them
24 or not. No one should be speaking or making

1 other noises while someone is making their oral
2 comments, and in between speakers we will also
3 maintain quiet. If anyone cannot comply with
4 being polite and respectful, you will be asked
5 to leave the room.

6 I will call each speaker up to the podium.
7 Please use the microphone when making your
8 comments.

9 First we'll hear from Crandall Jones.

10 MR. JONES: Good afternoon. I'm Crandall
11 Jones. I am the municipal manager of Norristown
12 and coming to support the project.

13 The project is important to the
14 Municipality of Norristown for a number of
15 reasons: One has to do, certainly, with jobs
16 creation, both short-term jobs that will be
17 created by the construction and related services
18 of the project development, but also long-term
19 jobs that are created just because of the jobs
20 that currently exist and will exist in King of
21 Prussia.

22 Right now what we're seeing in terms of
23 our own development is an influx of new
24 residents who consistently say they move here

1 because of proximity to their work. A lot of
2 times that work is in King of Prussia, sometimes
3 that work is beyond King of Prussia. One of the
4 consistent things they say about that is, you
5 know, I wanted, one, to get great prices on a
6 home; but, also, two, I didn't want to have to
7 deal with the traffic issues that are related to
8 trying to get to my job. So if they can have
9 the opportunity to jump on the train and go
10 straight to King of Prussia, that's certainly
11 better for them.

12 The other part of the whole jobs piece is
13 that we have current folks who are either
14 employed in that area or seeking to be employed
15 in that area. And as you know, it's four miles,
16 basically, from here to King of Prussia, but in
17 the congestion that exists to get from here to
18 King of Prussia, that four miles can be 25 to
19 30 minutes. Sometimes that makes a large
20 difference in did I get to work on time or
21 didn't I get to work on time.

22 So it's important that an opportunity be
23 provided for folks to keep their jobs or
24 actually be viable for them to seek employment,

1 because a lot of folks don't have access to
2 personal transportation, so public
3 transportation is that best option.

4 For those reasons and for several more, we
5 think it makes sense that this project go
6 forward and are in support of it.

7 Thank you.

8 MR. O'MALLEY: Thank you, Crandall.

9 Next we'll hear Steve Kline.

10 MS. SMITH: Emily, he's not here yet.

11 MR. O'MALLEY: Next we'll hear from Samuel
12 Hagopian?

13 MR. HAGOPIAN: Hagopian.

14 MR. O'MALLEY: Hagopian.

15 MR. HAGOPIAN: I'm Sam Hagopian. I would
16 like to express my vehement opposition to the
17 King of Prussia Rail Project and urge SEPTA to
18 choose the No Action Alternative for this
19 project.

20 As a resident of King of Prussia for the
21 last decade and a resident of Valley Forge Homes
22 for the last three, I see no benefit of this
23 rail line to our community. The \$1.2 billion
24 price tag is a waste of funds, and the \$600

1 million that SEPTA needs to raise to complete
2 this project would have a better use improving
3 traffic congestion not just in Upper Merion, but
4 in eastern and central Montgomery County
5 overall.

6 The concern this project could poison our
7 drinking water will only make King of Prussia
8 competitive with Flint, Michigan. The fact that
9 the firehouse will have to be relocated with
10 this project and no public safety impact study
11 has been completed, let alone discussed, puts
12 our entire community in grave danger.

13 That being said, if SEPTA wishes to bring
14 this boondoggle of a project upon themselves,
15 the PA Turnpike North/South Option should be
16 their LPA.

17 Thank you.

18 MR. O'MALLEY: Thank you, Sam.

19 Next we'll hear from Louis Perugini.

20 MR. PERUGINI: Good evening. And I'm just
21 here to represent the Mayor of Reading, Willie
22 Scott. He asked me to come down and say a few
23 words that Reading is interested in rail
24 passenger service, and so we're going on record

1 to that effect.

2 I hear the naysayers about rail service.
3 The United States has probably the worst rail
4 service, for a country as rich as it is, in the
5 whole world. South Africa has better transit
6 than we do. And if you've ever ridden the
7 Trans-Orient Express, you'll see what rail
8 passenger service is all about.

9 Why there's any opposition is beyond
10 imagination, but, anyway, it's there. I want
11 just to let people know that we're just as
12 concerned in the north of King of Prussia,
13 bringing customers into the mall and
14 Philadelphia from Pottsville and many of the
15 coal regions as much as your concern is to bring
16 them in from the south to obviate the need to go
17 on the Schuylkill Expressway.

18 So if there's some way that at least we
19 can show that we're interested and along the way
20 keep pursuing this idea, we're all for it.

21 Thank you.

22 MR. O'MALLEY: Thank you, Louis.

23 Next we'll hear from Bernard

24 D-a-g-e-n-a-i-s. If you can help me out with

1 that, I'd appreciate it.

2 MR. DAGENAIS: Sure. My name is Bernard
3 Dagenais. I am the president and CEO of the
4 Main Line Chamber of Commerce. I'm here this
5 evening on behalf of 950 member companies of the
6 Main Line Chamber of Commerce to speak in favor
7 of the Norristown/King of Prussia Rail extension
8 project.

9 The Main Line Chamber is a business
10 membership organization overseen by a board of
11 directors made up of business leaders. Our aim
12 is to help our member companies and other
13 companies in the region to succeed for the good
14 of our economy and for our residents.

15 I also am president of a charitable
16 organization, Main Line Chamber Foundation,
17 which donates scholarships and helps fund the
18 education of volunteer firefighters and
19 emergency medical technicians throughout the
20 region.

21 The Chamber of Commerce's members are
22 spread primarily through the four counties of
23 Montgomery, Delaware, Chester, and Philadelphia
24 Counties, although we do have some members

1 beyond those borders. The size of our geography
2 is one of the reasons that we're interested in
3 this train for the entire region as well as the
4 communities that make up that region.

5 The Main Line Chamber has long been a
6 proponent for public transportation in Greater
7 Philadelphia. The railways used by SEPTA and
8 the city and the suburbs are envied by other
9 regions across the country that did not have the
10 foresight to build rail infrastructure. We
11 believe that continued investment in rail is
12 good for the region in general and that this is
13 a project that is an important step that will
14 help area residents to get to jobs, take cars
15 off the road, alleviate congestion, and reduce
16 commuting time for both public transit and
17 highway users.

18 As a representative of employers, I can
19 tell you that employees are increasingly seeking
20 public transit options to travel to and from
21 their jobs. Some of the Chamber's members can
22 be expected to benefit: They include healthcare
23 systems, colleges and universities, and both
24 private and publicly-held companies. This is a

1 regional impact, I want to stress.

2 Upper Merion benefits from the tax impact
3 from businesses, and this project will help
4 serve the employees who work with some of these
5 companies.

6 We all know the Schuylkill Expressway is
7 heavily congested through much of a typical day.
8 This project takes cars off the road and it
9 becomes faster and easier for commuters to use
10 public transit.

11 It's both a retail and a tourism area
12 here, so people getting back and forth is going
13 to benefit from that. The statistic of 5,600
14 people a day using the bus to travel to King of
15 Prussia is a large number, and the trip by rail
16 would be faster and more efficient with 99
17 percent on-time performance by the Norristown
18 High Speed Line.

19 This project is -- you know, personally,
20 for me, having moved from the Washington D.C.
21 area, there is a cost, an economic impact to
22 traffic congestion that is measurable, I can
23 tell you. The ability for employees to get
24 around and access transit is a major

1 consideration for companies deciding on
2 locations, and there are positive environmental
3 impacts as well.

4 This project is good for Norristown, King
5 of Prussia, the Main Line -- through which
6 Norristown High Speed Rail Line runs -- and the
7 entire Greater Philadelphia region.

8 MR. O'MALLEY: Thank you, Bernard.

9 Next we'll hear from Barry Seymour.

10 MR. SEYMOUR: Good evening. My name is
11 Barry Seymour, and I'm the executive director of
12 the Delaware Valley Regional Planning
13 Commission. We're the federally-designated
14 metropolitan planning organization for the
15 Greater Philadelphia region. We serve a diverse
16 nine-county region in two states, including
17 Bucks, Chester, Delaware, Montgomery, and
18 Philadelphia in Pennsylvania; and Burlington,
19 Camden, Gloucester, and Mercer in New Jersey.

20 We work with and on behalf of regional
21 partner agencies, member governments and
22 citizens to develop a shared vision for how our
23 region should grow. Under the federal
24 transportation laws we are required to develop

1 and maintain a long-range plan, which we update
2 every four years, and coordinate federal and
3 state transportation spending to ensure that the
4 projects we fund now will combine to get us
5 closer to that vision, which we do by
6 maintaining the regional Transportation
7 Improvement Program, otherwise known as TIP.

8 DVRPC has more than a 50-year history as
9 an organization, and our history with the King
10 of Prussia Rail Project is nearly as long. It
11 was included in our very first long-range plan
12 for the region, a plan developed back in 1969
13 that looked ahead to the year 1985. Rail
14 service to King of Prussia is also included in
15 our newest long-range plan, Connections 2045,
16 which our board adopted just last month.

17 Under federal law, a plan needs to be
18 fiscally constrained, which means the region
19 must collectively set priorities and identify
20 those projects that they wish to advance. The
21 King of Prussia Rail Project is the only
22 extension of new rail service in the
23 Pennsylvania portion of our region, serving an
24 area that has never had adequate transit

1 service.

2 KOP Rail was a good idea in 1969 and it is
3 an even better idea today. The proposed project
4 will connect one of Greater Philadelphia's most
5 important job centers to the rest of the region
6 and allow it to grow efficiently by attracting
7 new development to the parts of King of Prussia
8 that have the infrastructure to support it.

9 The KOP Rail Project will better connect
10 residents and workers in the King of Prussia
11 area with each other and with destinations in
12 their community, such as the KOP mall, and
13 provide new regional connectivity between the
14 region's third largest employment and economic
15 center here at King of Prussia with Center City
16 and other communities.

17 The project will take cars off the road,
18 reduce congestion, and air pollution, and cut
19 over 30 minutes from current rush-hour transit
20 travel times between King of Prussia and Center
21 City with much greater reliability than
22 passengers experience today.

23 In addition to our long-range plan, the
24 DVRPC has also worked closely with Montgomery

1 County, SEPTA and Upper Merion to envision and
2 plan for the stations that are well-connected
3 with the development and designed to carefully
4 integrate the communities they will serve.

5 We believe KOP Rail is a project of major
6 regional benefit, and we look forward to
7 continuing to work with SEPTA and other regional
8 partners to help make it a reality in the coming
9 years.

10 Thank you.

11 MR. O'MALLEY: Thank you, Barry.

12 Next we'll hear from Val Arkoosh.

13 MS. ARKOOSH: Good evening. Thank you for
14 accommodating my crazy schedule tonight.

15 My name is Valerie Arkoosh. I am the
16 chair of the Montgomery County Board of
17 Commissioners, and I would like to offer my
18 unwavering support for the King of Prussia Rail
19 Project and to comment on SEPTA's Draft
20 Environmental Impact Statement, including the
21 Locally Preferred Alternative and the two design
22 options.

23 Montgomery County is a large growing
24 county in the Philadelphia suburbs. We have

1 over 820,000 residents and 580,000 jobs -- we
2 have a higher population than four states in the
3 union -- and every day 85,000 more workers
4 commute to our county than leave it to work
5 elsewhere.

6 The workhorse of our county economy is
7 King of Prussia, an edge city located in Upper
8 Merion Township with its 28,000 residents,
9 60,000 jobs, 4,000 companies, and major tourist
10 destinations. SEPTA's proposed extension of the
11 Norristown High Speed Line to King of Prussia
12 gives us the chance to knit the region together
13 like never before and to position Montgomery
14 County for the economy of the 21st century.

15 It will also revolutionize the communities
16 along the existing route. For county residents
17 in places like Hughes Park, Gulph Mills, King
18 Manor, Bridgeport, and Norristown, a short walk
19 and an equally short train ride will take them
20 to jobs and destinations in Upper Merion that
21 they can only access today by car.

22 For residents in Upper Merion, they can
23 easily be connected to our first-class medical
24 centers in Center City and also to Norristown,

1 where we have growing and thriving restaurant
2 and theater opportunities.

3 The Draft EIS is the culmination of a
4 massive effort by SEPTA and its many partners,
5 which included Montgomery County, to identify
6 the best alignment and study its effects. Using
7 methodologies required by the Federal Transit
8 Administration, the results are striking: 9,500
9 new weekday riders by 2040; travel times from
10 Center City and Norristown cut by roughly half;
11 up to 18.4 million fewer vehicle miles traveled
12 each year on our roadways; an annual reduction
13 of 2.1 million hours sitting in traffic; and up
14 to 5,800 tons of carbon dioxide emissions
15 eliminated every year.

16 I am also a physician, and I realize so
17 clearly that this project is equally about
18 public health as it is about transportation and
19 economic development. This Draft EIS is also
20 the culmination of hundreds of hours of public
21 input. SEPTA went above and beyond to be
22 transparent and to listen to the community.
23 They held not one but three well-publicized open
24 houses every step in the alternatives analysis

1 process. They met regularly with committees of
2 Upper Merion citizens, including one made up of
3 residents most impacted by the project. I
4 personally accompanied SEPTA staff as we walked
5 through the backyards of the Village at Valley
6 Forge to understand the impact of the Locally
7 Preferred Alternative. The PA Turnpike
8 North/South Option is proof that SEPTA is
9 addressing the concerns of the neighbors.

10 The KOP Rail Project is entirely
11 consistent with our Montgomery County 2040
12 comprehensive plan. It meets goals of providing
13 transportation choices to our residents and
14 improving transportation access to our
15 businesses. It is also identified in the plan
16 as a future vision project. It could not be any
17 clearer that Montgomery County knows where we
18 want to go and that the KOP Rail Project will
19 help take us there.

20 Thank you for the opportunity to comment
21 and know that Montgomery County will continue to
22 be your partner as this effort advances into the
23 Final EIS phase.

24 Thank you.

1 MR. O'MALLEY: Thank you, Val.

2 Next we'll hear from Al Achtert.

3 MR. ACHTERT: It's Alfred Achtert, 7228
4 Radbourne Road, Upper Darby. That's
5 A-c-h-t-e-r-t.

6 I urge SEPTA on this to think big.
7 There's an area that you're coming very close
8 to, and that's the area of North Gulph Road,
9 Swedesford Road, Guthrie Road, that triangular
10 area. It used to be a golf course that's been
11 redeveloped now; you have a major grocery store
12 over there, apartment complexes that are being
13 built, you have the Children's Hospital over
14 there, and a lot of what you could broadly call
15 other retail and recreational activity centers
16 in that area. The Town Center is what they're
17 calling it over there.

18 That would be served by the alternative of
19 the Turnpike-Gulph Road alternative, and I would
20 urge you to combine that with the approved or
21 the nearly approved looping and make a loop from
22 the mall up around by 1st and -- 1st and Gulph
23 Road and then back down to the mall to then come
24 back. Double track and run the cars around it.

1 Wherever the car -- all the cars going toward
2 Norristown on their next trip on one track and
3 come on the other side to go towards 69th
4 Street. That would give you better options of
5 serving some of the areas. I urge you to do
6 that. And I want you to go with the
7 alternatives and make sure that you have the
8 fire company signing off on those.

9 Also, I see six cars are to be added, and
10 not to be totally compliant with the existing
11 fleet, and I'd like you to check very carefully
12 to see that you have enough spares. SEPTA
13 recently, on some of their purchases, have not
14 been very good on estimating the number of
15 vehicles needed. The trackless trolley order,
16 the rebuilding of the PCC cars, Route 15, you
17 didn't get enough in either case, and we're
18 waiting to see if we're going to have enough on
19 the (indiscernible) buses that are now coming
20 in. Be sure to make sure that you have a good
21 enough spare ratio on that.

22 Thank you.

23 MR. O'MALLEY: Thank you.

24 Next we'll hear from Steve Kline.

1 MR. KLINE: Good evening. My name is
2 Steven Kline. I'm chairman of the Montgomery
3 County Planning Commission, and I'm here
4 representing the Montgomery County Planning
5 Commission Board.

6 The Montgomery County Planning Commission
7 enthusiastically supports the extension of
8 SEPTA's Norristown High Speed Line to King of
9 Prussia as documented in the Draft Environmental
10 Impact Statement. This transit expansion of the
11 King of Prussia area will improve travel times
12 between our region's three major employment
13 centers and provide a reliable transportation
14 option for commuters and residents.

15 The MCPC supports the Locally Preferred
16 Alternative identified in the King of Prussia
17 Rail Project Draft Environmental Impact
18 Statement because it meets the project purpose
19 and is the result of extensive public feedback
20 and achieves the goal of the county and regional
21 comprehensive plan.

22 The Draft EIS's project purpose and need
23 to be -- to provide faster and more reliable
24 public transit service to King of Prussia from

1 Norristown, Philadelphia and points in between
2 improve connectivity within the King of Prussia
3 area and better serve existing transit riders,
4 while also accommodating new ones. The
5 Montgomery County Planning Commission
6 unequivocally believes that the Locally
7 Preferred Alternative meets this purpose and
8 need.

9 SEPTA engaged in extensive public
10 involvement for the last four years. SEPTA
11 hosted meetings for residents near the build,
12 near the build alignments, including
13 regularly-scheduled neighborhood forums and
14 backyard visits, which have contributed to the
15 content of the Draft EIS and resulted in the
16 design options to address concerns.

17 They have also worked closely with local
18 stakeholders, including Upper Merion Township,
19 GVF Transportation, the King of Prussia Business
20 Improvement District, and Montgomery County, to
21 ensure that the wide range of inputs and
22 perspectives shape the project outcome.

23 Montgomery County's current comprehensive
24 plan, MontCo 2040, A Shared Vision, specifically

1 identifies extending the NHSL to King of Prussia
2 as a major component of our future transit
3 vision. This project is integral to the goal of
4 the County transportation network that serves
5 all people and supports land use and economic
6 development efforts.

7 Montgomery County also acknowledges that
8 the Delaware Valley Regional Planning
9 Commission's just-adopted long-range regional
10 plan, Connections 2045, lists the Norristown
11 High Speed Line extension as a priority project
12 for the transit system's expansion, and
13 identifies it as the only such new capacity
14 project expected to be funded during the plan's
15 time horizon.

16 The Montgomery County Planning Commission
17 hereby supports the SEPTA King of Prussia Rail
18 Project Draft Environmental Impact Statement.
19 We affirm that the Locally Preferred Alternative
20 meets the purpose -- the project purpose and
21 need and is a longstanding effort in the
22 county's transportation plan. We passed a
23 resolution today, our Planning Commission Board,
24 it was unanimous.

1 Thank you.

2 MR. O'MALLEY: Thank you, Steve.

3 Next we'll hear from Pam Forster.

4 MS. FORSTER: Good evening. Pam Forster,
5 a resident of King of Prussia.

6 When my husband and I decided to buy a
7 house -- my husband is a lifelong resident of
8 King of Prussia and I was born here in
9 Norristown, moved to Lower Providence and moved
10 into the area -- we chose our house because of
11 where we worked and where we wanted to live. We
12 are both volunteers within the community. And
13 when looking for employment we decided to be
14 employed in King of Prussia as well. Most
15 people, when you go for a job, I've interviewed
16 with places that are in Philly and I looked at
17 the transportation time it would take, and took
18 that all into consideration.

19 A couple key points: According to the
20 district's top ten development -- economic
21 development projects, only one of them will be
22 one of the stops along the rail, which is the
23 King of Prussia Mall. The other ones are mostly
24 in the Village or 251 DeKalb, and other

1 locations that the rail would not be stopping
2 at.

3 Additionally, being a resident of
4 Brandywine Village, on the 3D map where you put
5 your house in, when I look out on my front porch
6 I will see the rail. No longer will I be able
7 to see the sun setting. I will see the rail.
8 So while you get to sit on your porch and watch
9 the sunset, I get to watch a rail go by 20 hours
10 a day. I did not buy my house for that reason.

11 And statements were made that back in 1969
12 a rail would have made sense, and I would agree
13 with you on that, taking the people from
14 Philadelphia -- my in-laws moved there, because
15 of getting a job with GE -- and it would have
16 made sense before the residents were put in.

17 A decrease in traffic: 14.5 percent of
18 King of Prussia employees live in Philadelphia.
19 That is down from the 2004 census data. Most
20 are up in Chester, Delaware and Bucks County,
21 which the rail will have no impact on them.
22 Also, 4.1 percent of public transportation live
23 in King of Prussia. The rest drive private
24 vehicles. I don't see how we will decrease

1 traffic.

2 I am a resident, I work in King of Prussia
3 at one of the stops. I would have to drive to a
4 spot to park my car to get on the rail to go to
5 work. I don't see it decreasing the traffic.
6 Between now and 2035 the district reports that
7 4,000 new jobs will be created. Between now and
8 2035.

9 Additionally, with the increase in the
10 properties that are going in, we will have 6,000
11 more residents. So, again, how is that going to
12 help our traffic?

13 And, lastly, the Delaware Valley Regional
14 Planning, I understand they're on board with
15 this, but in looking at their data, there's a
16 thing out there right now called PACarpool.org
17 that the DVRPC has on their website with
18 potential tax credits if you carpool. Maybe
19 that's an option we should be looking at and
20 putting a million dollars into a campaign for
21 that rather than 1.2 billion into a rail.

22 Thank you.

23 MR. O'MALLEY: Thank you, Pam.

24 Next we'll hear from Alex "Doty"?

1 MR. DOTY: "Doty."

2 MR. O'MALLEY: "Doty."

3 MR. DOTY: Easy mistake.

4 My name is Alex Doty, and I represent the
5 group Pennsylvanians for Transit.

6 Pennsylvanians for Transit is connecting
7 more people to jobs in their communities by
8 supporting improvements to public transportation
9 in Pennsylvania.

10 King of Prussia Rail gives people a
11 reliable and efficient option for traveling
12 between King of Prussia and Philadelphia. Every
13 day 5,600 people travel to King of Prussia by
14 bus. The bus route has an on-time performance
15 of 65 percent, because of traffic on the
16 Schuylkill Expressway and within King of
17 Prussia. The Norristown High Speed Rail and
18 Market-Frankford el have an on-time performance
19 of 99 percent.

20 Driving from King of Prussia to City Hall,
21 congestion is frequent and unpredictable. The
22 trip regularly takes 70 minutes. King of
23 Prussia Rail will consistently deliver
24 passengers to City Hall in 40 minutes.

1 The Philadelphia region is growing. In
2 fact, the Southeast accounts for 105 percent of
3 population growth in Pennsylvania. Transit is
4 the most efficient way to serve the
5 transportation needs of residents and employers
6 as our region grows and as traffic increases:

7 Public transportation like King of Prussia
8 Rail gives us more transportation choices. For
9 some that means access to an otherwise
10 unreachable job. For others it might mean
11 saving thousands of dollars by becoming a
12 one-car household. For elderly and disabled
13 passengers, it increases self-sufficiency,
14 giving baby boomers more ability to age in
15 place.

16 The KOP Rail extension makes public
17 transportation a better mobility option for both
18 the existing 5,600 bus passengers and many more
19 who will be attracted by the much-more efficient
20 King of Prussia Rail.

21 Thank you.

22 MR. O'MALLEY: Thank you, Alex.

23 Next we'll hear from Vanessa Schallack.

24 MS. SCHALLACK: Okay. I say this is

1 definitely needed. One thing that's not being
2 addressed is safety issues. I have been on the
3 124 headed for the City, the Boulevard was
4 closed. The bus went the local route. It took
5 us about three hours. If the bus had to pass,
6 it took them over four hours.

7 If you've ever been on a bus around
8 Christmastime or any middle time of day, you get
9 upset kids, cranky kids. Okay, you're going to
10 get that, but the drivers have to deal with
11 that. They've got kids, you know, they're
12 young, screaming. And they're getting frazzled,
13 because, you know, you have people that are
14 running late to work. Luckily, I was just there
15 out of leisure. I didn't have a job to get to.
16 And I also see that point of it. Okay. That
17 thing's going to take maybe less than an hour?
18 An ideal condition takes less than an hour on
19 the 124 or 125.

20 I also would appreciate if you mentioned
21 access to Valley Forge Park. I think that would
22 be great. And I also mention, I think I said in
23 an earlier meeting, about if you're sitting on
24 DeKalb Pike, like waiting on the 124 or 125, I

1 nearly passed out from the fumes. Imagine the
2 buses that may be off the road. Maybe have
3 smaller shuttles. Target -- the shuttles, like
4 courtesies, so you don't have to have it right
5 along 202. I think that Henderson and 202,
6 there's a lot of activity there. You've got the
7 Target, the Acme further down. So I definitely
8 think this is needed.

9 A lot of improvements can be made. And
10 taking into account, like I said, the Valley
11 Forge Park. You've got the Schuylkill River
12 Trail, that's good, a lot of people use that,
13 and I see people, you know, trying to get -- you
14 know, one person is taking a bike and you have
15 three people maybe want to take a bike on the
16 124 or 125, you can only fit so many out there.

17 So I definitely think this is needed,
18 ideally. There's no perfect solution. But I'm
19 glad, like I said, you do have consideration.
20 Initially, I think you had two or three and then
21 you added additional routes. You're looking to
22 work with the community. So I see a lot of
23 positives for that.

24 Unfortunately, like I said, being a

1 resident, if you live here -- like you said, it
2 wasn't there when you moved in. So you can't
3 predict the future, but I think it will affect
4 traffic, like I said, if you don't have all
5 those buses going down 202, if the thing's
6 running on time. Because I've had some people
7 take a bus two or three early before that to
8 allow for the Schuylkill maybe being messed up.
9 They have a job to get to. I think I saw some
10 person crying, it was her first day. More than
11 likely, she probably lost her job. I mean,
12 that's pitiful.

13 So, like I said, I think this is needed
14 more than it isn't, so hopefully something can
15 be worked out to meet the needs of as many as
16 possible without disrupting those that, like,
17 are concerned with other issues.

18 So thank you for considering this and
19 hopefully have this move forward.

20 MR. O'MALLEY: Thank you, Vanessa.

21 Jeff DeVuono.

22 MR. DeVUONO: Good evening. My name is
23 Jeff DeVuono. I'm an officer of Brandywine
24 Realty Trust, a company headquartered in

1 Philadelphia, that develops, manages -- and
2 manages commercial, residential and mixed-use
3 real estate projects in multiple markets
4 throughout the United States.

5 My role in the company is to oversee its
6 portfolio of properties in Pennsylvania. In
7 this capacity, I also serve as a board member of
8 the King of Prussia Business Improvement
9 District, where I've -- where I formally chaired
10 the organization, and currently co-chair its
11 transportation committee.

12 I come today as a representative of
13 Brandywine to state our company's full support
14 for the proposed extension of SEPTA's existing
15 Norristown High Speed Line into King of Prussia.

16 Infrastructure investment is a tremendous
17 economic development tool. It inevitably
18 creates jobs, expands business, and ensures that
19 we stay a competitive community; not just
20 locally, but nationally and on a global stage.
21 Transit-accessible submarkets are some of the
22 strongest performers nationally, achieving rent
23 and development levels in excess of the broader
24 office market. Vacancy rates are reported to

1 be, in these transit-served communities, at 4
2 percent lower than nontransit, and rents are 49
3 percent higher in transit-served markets
4 compared to nontransit. And almost 50 percent
5 of new real estate construction taking place
6 nationally is in transit-accessible submarkets.

7 Brandywine Realty Trust believes that
8 connecting King of Prussia to Center City and
9 University City via the Norristown High Speed
10 Line is a critically-necessary project for our
11 region and a powerful economic engine for the
12 community, the county, the region, and the
13 state.

14 Data shows that for every dollar invested
15 in public transportation, approximately four
16 dollars is generated in economic benefits. It
17 will increase existing commercial -- real estate
18 values, both residential and commercial. It
19 will create new sources of tax revenue resulting
20 from new development, both residential and
21 commercial. And Brandywine believes that the
22 proposed rail project will create jobs, connect
23 employers to a broader pool of employees and
24 give local residents easier access to jobs along

1 this route.

2 A recent study by the Economy League of
3 the Greater Philadelphia Region stated that the
4 King of Prussia Rail Project would add thousands
5 of jobs during construction and a thousand jobs
6 annually thereafter. King of Prussia is the
7 largest employment center in suburban
8 Philadelphia. This rail project would create a
9 direct, convenient, low-cost transportation
10 alternative for Norristown residents to King of
11 Prussia. This is an incredible opportunity for
12 this community to act as an employment center
13 and serve as a catalyst for growth and
14 prosperity for all.

15 So Brandywine Realty Trust believes that
16 this transformative project will increase
17 regional mobility and reduce congestion.
18 Studies show a reduction of up to 18 million
19 automobiles annually, clearly impactful, and
20 save citizens and businesses valuable time and
21 money.

22 So it is for these reasons and more that
23 we are honored to support the King of Prussia
24 Rail Project and why I come before you today to

1 enthusiastically represent Brandywine Realty
2 Trust as we lend our endorsement to this
3 essential Philadelphia regional project.

4 Thank you for your time and consideration.

5 MR. O'MALLEY: Thank you, Jeff.

6 Next we'll hear from Matt Tucker.

7 MR. TUCKER: Good evening. My name is
8 Matt Tucker. I'm with Gladstone Commercial
9 Corporation. We're a publicly-traded real
10 estate investment trust based in Washington, DC.
11 I drove up from DC today to testify tonight in
12 support of the rail extension project.

13 We own several office and industrial
14 buildings in suburban Philadelphia, including
15 935 1st Avenue in King of Prussia. We support
16 the rail project because we believe it will
17 provide better connectivity to housing and
18 employment centers in the region. The improved
19 transit infrastructure will decrease traffic
20 congestion and provide alternative transit
21 opportunities for people who live in the market
22 and live outside of the market who travel in for
23 work. The investment in infrastructure will
24 create jobs both through the construction

1 process and in the future growth of King of
2 Prussia.

3 And I think this is an important point
4 that hasn't really been addressed: We've seen
5 in markets around the country where you've got a
6 suburban mall and suburban office parks that
7 have not been continually invested in from an
8 infrastructure standpoint, and a lot of those
9 are in decline. It's important for King of
10 Prussia to invest in transit infrastructure like
11 this project to ensure its position as an edge
12 city, as a source of growth for the region and a
13 source of jobs and vitality. And I think if it
14 doesn't happen that's a big risk for the region.

15 Again, just to summarize, my name's Matt
16 Tucker of Gladstone Commercial, and we support
17 this project wholeheartedly.

18 Thanks.

19 MR. O'MALLEY: Thank you, Matt.

20 Next we'll hear from Scott Maits.

21 MR. MAITS: Good evening. Thank you.

22 I am a rail transit advocate design
23 expert. I've worked with a number of different
24 groups. I've had the most (indiscernible) in

1 the Northeast Corridor. Some very bright people
2 think I'm a very good expert for this. So I
3 have some comments on this, the most logical new
4 rail line in the Philadelphia region.

5 First off, this should be done as soon as
6 possible. This is the line to do. But it is a
7 major, major investment and needs to be really
8 well thought out. Previously we had the best
9 railroads in the country and in the world here,
10 the Pennsylvania Railroad, for instance, and it
11 would look at 100-year plans, what are we going
12 to do later.

13 And to listen to all the various comments
14 from different people (indiscernible) of this
15 neighborhood involved, there are some other
16 needs besides going to 69th Street and to West
17 Philadelphia, that's a one-seat ride in
18 Philadelphia, and how do we do this. If this is
19 done, but with a slightly heavier
20 infrastructure, you will be able to someday also
21 share the Norristown-oriented cars with regional
22 rail. It's not legal currently, but there were
23 plans to do that. There's books written on the
24 subject.

1 It's something that's not easy, but it's
2 something that's absolutely necessary, and not
3 just to go to Philadelphia but to also go out to
4 Exton, and to Great Valley, to go across the
5 (indiscernible) to come from Reading and to come
6 in. But you have to also realign the preferred
7 alternative to be either along the PECO
8 right-of-way or perhaps as (indiscernible) was
9 asking, along 202, which is more expensive, but
10 is not where -- nowhere -- it's not at houses or
11 even in backyards, and then follow Gulph Road up
12 and over 202, shared with the bikeway, at least
13 to get through there from the Chester Valley
14 Trail, and then follow Gulph Road all the way to
15 the casino. This would be a six-stop ride and
16 would be useful by the thru trains to the Great
17 Valley from Norristown and the Norristown train
18 line.

19 I will have written a comment about this
20 that I'll submit explaining it better, but it's
21 -- this is a 100-year investment you're deciding
22 on here, so I ask you to please -- and I'm sorry
23 I wasn't able to participate in this earlier,
24 but to please consider the longer-term

1 implications when you do build what's going to
2 be the biggest investment in the region.

3 MR. O'MALLEY: Thank you, Scott.

4 Next we'll hear from Ana Fluehr.

5 MS. FLUEHR: Good evening. My name is Ana
6 Fluehr, and I am against the \$1.2 billion King
7 of Prussia Rail Project. The project is
8 expensive and the Montgomery County can use the
9 investment in some other areas that have high
10 need for improvement.

11 So, the investment can be used to make
12 roads safer and driving more pleasant. So,
13 pedestrian crossing light is needed on West
14 Marshall Street. For example, on the
15 intersection of Markley Street and Marshall
16 Street located in Norristown, there is no lights
17 for pedestrian to cross the street. And along
18 from Swede Street intersection with Marshall
19 Street to Forrest Avenue intersection with
20 Marshall Street there is no lights for
21 pedestrian crossings.

22 Some of the car drivers on that part of
23 the town do not pay attention. It's -- and it's
24 a crossing they do not stop. They keep driving.

1 On the Markley Street and West Marshall
2 Street is the car dealership that has the cars
3 parked next to SEPTA train line. The cars
4 parked have no license plate. High crime in the
5 Norristown is closely related to the business
6 (indiscernible). For instance, it is okay for
7 the car to be parked next to SEPTA line that has
8 no gate between the cars and the rail, which is
9 not very safe.

10 Second, those cars have no license plate
11 and what kind of deals are done with these cars
12 is questionable. I have noticed that some cars
13 on the road have no license plate.

14 Also, the car dealership on location,
15 Markley Street and West Marshall intersection,
16 has (indiscernible) windows covered with a
17 drywall, which gives the area a terrible look.

18 I have more to say, but time's up. Thank
19 you.

20 MR. O'MALLEY: Thank you.

21 Next we'll hear from Adam Lang.

22 MR. LANG: Hi, good evening. I just
23 wanted to make a couple comments from a
24 different perspective.

1 Up until two months ago I lived in North
2 Philadelphia and I worked out in the King of
3 Prussia area, and just recently I've moved to
4 Norristown predominantly because the commute to
5 work is such an awful experience. You know, one
6 month it's like I'll try SEPTA, then after you
7 get tired of that I'll go back to driving
8 Schuylkill, and then the next month I'll try
9 SEPTA again.

10 And, you know, so from that perspective of
11 someone who when they moved out of Philadelphia
12 predominantly focused on, you know, where
13 they're going to work or job opportunities
14 are -- I currently work out in King of Prussia,
15 as I mentioned, but being in IT need easy access
16 to the Center City job markets for potential
17 future growth.

18 So, with that being said, I just wanted to
19 add my support, not in particular any specific
20 alternative routes that are proposed, but just
21 the idea that something does need to be done to
22 help the average workforce get to and from where
23 they're working in a way that doesn't involve an
24 hour and a half on the Schuylkill.

1 Also, I have other friends that live in
2 North Philadelphia that work out here, also, and
3 they're -- as you've heard some people, you
4 know, they're crushed on the 124 and 125. They
5 have to go across the Wissahickon and then
6 transfer again, et cetera.

7 So just in general, I'd just like to give
8 my support that I appreciate that you guys are
9 trying to do something and to looking to make
10 life -- things better for people's commute, and
11 I appreciate that.

12 MR. O'MALLEY: Thank you, Adam.

13 Adam is our last speaker, so at this point
14 I will close this hearing. And I thank you all
15 for coming out this evening.

16 (Whereupon, the public hearing was
17 concluded at approximately 7:00 p.m.)

18 - - -

C E R T I F I C A T I O N

I, Krista L. Schultz, hereby certify
that the foregoing is a true and correct
transcript of the proceedings held in this
matter, as transcribed from the stenographic
notes taken by me.

KRISTA L. SCHULTZ
COURT REPORTER

(This certification does not apply to any
reproduction of this transcript, unless under
the direct supervision of the certifying
reporter.)

KING OF PRUSSIA RAIL
PUBLIC HEARING SCHEDULED

- - -

IN RE: PRIVATE ORAL COMMENTS

DATE: NOVEMBER 13, 2017

LOCATION: DOUBLETREE HOTEL, VALLEY FORGE
JEFFERSON BALLROOM
301 WEST DEKALB PIKE
KING OF PRUSSIA, PENNSYLVANIA, 19406

TIME: 1-2 P.M.

SHARISE THOMPSON, REPORTER
NOTARY PUBLIC

1 - - -

2 PRIVATE ORAL COMMENTS

3 - - -

4 MR. JOHN SCOTT DRENDALL: I live at
5 293 Adams Road here in King of Prussia.
6 My wife and I, and my daughters, have
7 lived here for about 30 years. And I am
8 basically in favor of the project, but I'm
9 curious about how it's going to be paid
10 for.

11 In general, I think growth in our
12 township is a good thing, and especially
13 mass transport, that would help alleviate,
14 I think, the traffic jams on the
15 expressway and 422 and all the roads
16 around here, and I think we are fortunate
17 to live here, you know, in a very low
18 taxed township, and that our low taxes
19 come predominately from businesses, and
20 this project, I think, helps those
21 businesses thrive and pay taxes. I am
22 also fortunate enough not to live anywhere
23 close to where the line would apparently
24 go through, although I'm not totally sure

1 of that. I don't know how I would feel if
2 it literally were in my backyard, and
3 those people who don't want it in their
4 backyard, I think, you know, they should
5 be listened to, and, if push comes to
6 shove, compensated, so I know that would
7 add to the price. So I'm curious about
8 all of these things. Thank you very much.

9 - - -

10 MR. VERNON HARTZELL: I've lived here
11 for 30 years, and when 422 was being
12 built, it was designed or sold as a way to
13 build a railroad up to Reading. What
14 happened to that? I know that the
15 junction of -- the Temple Junction slows
16 up the Regional Rail, but a high speed
17 line would work up there, I would think.
18 They have a billion dollars to throw
19 around. It doesn't -- it's not paid for.
20 It's going to have to be borrowed.

21 422 is a murder road. My son lives up
22 in San Antonio. He works at Montgomery
23 County Courthouse. He can't trust that
24 road to be there in time. You can't trust

1 it. There's always a death on that road
2 or an accident. And the high speed
3 line -- there are shuttle buses now that
4 work, if you get to the mall. My wife
5 works at ManorCare over here, and people
6 have to have it. They can't trust the
7 buses and trains now to get there, and the
8 high speed line would get them partway
9 there to the Para 23. I guess that's my
10 biggest thought.

11 - - -

12 MR. THOMAS LEAHY: I'm from
13 Collegeville Borough. We completed a rail
14 trail project through our borough,
15 somewhat intrusive, but none of the fears
16 came true. The value of our homes went
17 up, no evidence of any increased crime or
18 traffic. So I would be -- I am very much
19 in favor of this project, especially
20 speaking to the neighbors where the
21 development would take place that they
22 should be happy that it will improve their
23 property values. I have also ridden the
24 P & W Line to school, so I know it works.

1 It's a sensible, simple rail system.

2 That's it, thank you.

3 - - -

4 MR. GARY COHEN: I'm okay with the
5 project that they are looking to produce,
6 at least in principle, but I feel they
7 need to do a little bit more on
8 integrating it into the neighborhood. I
9 personally don't expect that I will ever
10 use it. I know other people, you know,
11 will use it coming into this area, but,
12 me, as a local, I probably won't be using
13 it.

14 And I don't think that -- well, I'm
15 okay with it being here, but I don't think
16 that it should negatively affect the
17 neighborhood, and, in particular, the
18 traffic that we already are facing. So my
19 comment, I suppose, would be the
20 integration of it on First Avenue. I feel
21 that taking that from a four lane road to
22 a two lane road to put an island in the
23 middle is counterproductive for traffic
24 flow. That's actually an artery in the

1 commercial park, and dropping that to one
2 lane is going to adversely affect traffic
3 flow, and, so, I prefer that they didn't
4 do it that way, and if they could come up
5 with something that would allow them to
6 maintain the current four lanes. Thank
7 you.

8 - - -

9 MR. MICHAEL SWEENEY: I'm in favor of
10 the project. I think it will spur
11 economic activity all along the rail line,
12 and I'm a stakeholder in that I do
13 business in King of Prussia, and I am a
14 homeowner in Delaware County, where the
15 train line runs through Merwood Park in
16 Havertown. I see it as nothing but
17 beneficial to the people throughout the
18 region. Thank you.

19 - - -

20 (Private oral comments concluded
21 at 2:00 p.m.)

22 - - -

C E R T I F I C A T I O N

I, Sharise J. Thompson, a Court
Reporter and Commissioner of Deeds for the
Commonwealth of Pennsylvania, do hereby certify
the foregoing to be a true and accurate
transcript of my original stenographic notes
taken at the time and place hereinbefore set
forth.

Sharise J. Thompson
Court Reporter
Commissioner of Deeds

DATED: _____

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shorthand reporter.)

KING OF PRUSSIA RAIL
PUBLIC HEARING SCHEDULED

- - -

IN RE: PRIVATE ORAL COMMENTS

DATE: NOVEMBER 15, 2017

LOCATION: NORRISTOWN MUNICIPAL BUILDING
235 EAST AIRY STREET
NORRISTOWN, PENNSYLVANIA 19401

TIME: 5-6 P.M.

SHARISE THOMPSON, REPORTER
NOTARY PUBLIC

- - -

PRIVATE ORAL COMMENTS

- - -

MR. JAMES MOIANI: I just want to start out by stating, of course, my dad does work in SEPTA Management, but I don't speak for him.

I just speak enthusiastically in support of the project, for the simple reason that I live in Haverford Township and I work in Upper Merion just up the hill from where one of the stops are, so, yeah, I would use it. I have heard criticism that it's not going to convert drivers into riders. I'm definitely an example -- at least one example of that not being true.

In the ten years plus, having commuted between Haverford Township and Upper Darby Township, where I used to live, and Upper Merion, I have seen traffic get worse, and I anticipate that by the time this thing is finally done, even if it stays on

1 schedule, it will just be worse still. By
2 that point, I'll probably be ready to quit
3 driving entirely, so, yeah, it would
4 definitely benefit me. I want to counter
5 the notion as well that it will hurt
6 property values. I just bought a house in
7 Haverford Township, and the existing line,
8 the same line obviously runs through
9 there, and I can tell you, from a very
10 recent experience, that the closer you get
11 to transit access, the more expensive
12 things get and not less. So I wanted to
13 kind of fight that perception a little
14 bit, and, yeah, I think that's it.

15 Other criticisms I've seen, and I do
16 think that they are onto something, with
17 considering possible changes that would
18 benefit local residents who would want to
19 use it. I'd imagine that if I did live in
20 Upper Merion Township -- you know, I've
21 seen the stops. Most of it is geared for
22 people like me to get to their offices,
23 but if I did live right in one of those
24 neighborhoods, there isn't really a stop

1 for me to go wherever I want to go, so I
2 don't know whether you can do that with
3 settled route changes, or maybe building
4 steps -- or not steps. Building a stop
5 that would require like a lot of
6 pedestrian access or maybe some walkways
7 or something over the Turnpike, but
8 something that you wouldn't think of that
9 might benefit people that live there who
10 would want to use it, because there's got
11 to be some of them. I know I would if I
12 lived there, and, also, to get to more
13 places than just the offices, the new
14 development on the former golf course,
15 much has been said that it bypasses that,
16 or it doesn't come close enough to it. I
17 think that's definitely a valid criticism
18 for -- you know, it would only help
19 ridership by getting you to other places.

20 A place that really isn't designed
21 with transit in mind, you can tell, it
22 doesn't have as much parking, it's a
23 little bit more dense. It's compatible
24 with a proposed rail link that I would've

1 hoped would get closer to that particular
2 development than it actually does. So,
3 yeah, those are two criticisms that I've
4 seen recently that I would agree with,
5 even though I am a big supporter of even
6 what's proposed. And, I think, that's
7 about it.

8 - - -

9 MR. BENJAMIN HAKIMFAR: I just came
10 tonight on behalf of Wurzak Hotel Group.
11 We own two hotels in the King of Prussia
12 area, one being the Hyatt Place on
13 American, which is directly adjacent to a
14 stop that would be for the proposed rail.
15 The other one is the Sheraton Valley
16 Forge, which is not in close proximity to
17 a proposed stop, but we're still very
18 supportive of this rail.

19 Many of our employees at the hotels
20 have to take up to three buses to get to
21 work, which is not practical. Of course,
22 hiring becomes almost impossible as well,
23 since the market is very limited, due to
24 limited transportation, and, I think, the

1 rail would not only be a positive for
2 providing more jobs in the area and
3 accessibility to jobs, but it will
4 encourage more employees to live in the
5 area as well, which, obviously, has its
6 effects, positive effects. Someone as
7 myself, who commutes every day to King of
8 Prussia from Center City, I, too, am
9 affected by the commute, as 76 is always
10 at least over an hour to get here even
11 though I am only 20 miles away, and the
12 weekend is even worse than that.

13 I moved here from California, and I
14 often describe King of Prussia to my
15 friends as the Mecca of everything you
16 need, and that's from shopping to food to
17 everything. And I say that people all
18 over Pennsylvania come to King of Prussia,
19 because everything is accessible here.
20 And I think the fact that there's a
21 different mode of transportation would
22 only increase the amount of people that
23 would come here. Also, I'm very confident
24 that with a rail system more people would

1 be inclined to stay at our hotels if their
2 final destination is a couple more miles
3 away, because of the accessibility of a
4 different mode of transportation, and,
5 obviously, that would bring in more taxes
6 to the area as well.

7 As a young family man, I also would
8 see King of Prussia as a more attractive
9 area for families to buy homes when they
10 are ready to leave the city if there's a
11 mode of transportation for them to want to
12 go to Center City or other parts of the
13 suburbs if needed. And I know that the
14 rail would also have a highly positive
15 impact on home prices, which would
16 provide, again, more tax dollars and that
17 makes the city happier and also the
18 residents and current homeowners. That's
19 all I have to say, that I hope that we get
20 a rail system soon. Thanks.

21 - - -

22 (Private oral comments concluded at
23 6:00 p.m.)

C E R T I F I C A T I O N

I, Sharise J. Thompson, a Court
Reporter and Commissioner of Deeds for the
Commonwealth of Pennsylvania, do hereby certify
the foregoing to be a true and accurate
transcript of my original stenographic notes
taken at the time and place hereinbefore set
forth.

Sharise J. Thompson
Court Reporter
Commissioner of Deeds

DATED: _____

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*A*ppendix E - List of Preparers

Appendix E List of Preparers

Federal Transit Administration (FTA)

Shauna Haas, Environmental Protection Specialist, Region 3

Timothy Lidiak, Community Planner, Region 3

Daniel Koenig, Community Planner, Region 3

Southeastern Pennsylvania Transportation Authority (SEPTA)

Jody Holton, Assistant General Manager, Planning

Ryan T Judge, Manager, Strategic Planning

Tamra Dann, PE, Director Project Development, Planning & Strategic Initiatives

Name	Degree	FEIS Contribution
AECOM		
Margaret Quinn	B.A., M.C.R.P.	Project Manager (NEPA Planning Phase)
Leslie Roche, AICP	B.A.	NEPA and Environment Manager
James Hess, AICP, NJPP	B.A., M.S.	Built Environment Specialist
Stuart Geltman	B.A., M.S.	Bus and Shuttle Service Planning
Michael Landis	B.S.	Senior Environmental Scientist
Julia Moore	B.S.	Environmental Scientist
Anthony Velazquez	B.S.	Meeting Record Compilation
David Nelson	B.A.	Graphic Artist
Marilyn Palmer	GIS Certified	Document Formatting
Katherine Farnham	B.A., M.S.	Section 106, Historic Structures Manager
Jesse Walker	B.A., M.A.	Archaeologist
Brian Albright	B.A.	Archaeologist
Vanessa Zeoli	B.A., M.H.P.	Architectural Historian
Thomas Herzog	B.A., M.B.A.	Air, Noise and Vibration Specialist
Christopher Salvatico, GISP	B.A., M.A.	Geographic Information Systems Specialist, Graphic Production
Patrick Coleman, PE	B.S., M.S.	Ridership Forecasting Manager
Andrew Walker, EIT	B.C.E., M.S.	Forecaster
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*A*ppendix F - List of FEIS Recipients

Appendix F List of FEIS Recipients

Federal Agencies	<p>United States Army Corps of Engineers Chief, Regulatory Branch Mr. Todd Schaible</p> <p>United States Department of the Interior Office of Environmental Policy and Compliance, Director Ms. Michaela E. Noble</p> <p>United States Environmental Protection Agency Regional Administrator, Region 3 Mr. Cosmo Servidio</p> <p>United States Department of the Interior Fish and Wildlife Service, Pennsylvania Field Office Supervisor Ms. Sonja Jahrsdoerfer Fish and Wildlife Biologist, Rare, Threatened, and Endangered Species (RTE) Mr. Robert Anderson</p>
State and Regional Agencies	<p>Pennsylvania Department of Environmental Protection Regional Director Mr. Patrick Patterson</p> <p>Pennsylvania Department of Transportation Secretary of Transportation Ms. Yassmin Gramian Deputy Secretary for Multimodal Transportation Ms. Jennie Granger Portfolio Manager, District 6 Mr. Timothy Stevenson</p> <p>Pennsylvania Historical and Museum Commission Executive Director Ms. Andrea Bakewell Lowery</p> <p>Delaware Valley Regional Planning Commission Executive Director Mr. Barry Seymour</p> <p>Greater Valley Forge Transportation Management Association Executive Director Mr. Rob Henry</p>

County and Local Agencies	<p>Montgomery County</p> <hr/> <p>Planning Commission Mr. Scott France, AICP</p> <p>Upper Merion Township</p> <hr/> <p>Township Manager Mr. Anthony Hamaday</p> <p>Lead Planner Mr. Robert Loeper, AICP</p> <p>Upper Darby Township</p> <hr/> <p>Mayor Mayor Barbarann Keffer</p> <p>Delaware County Planning Department</p> <hr/> <p>Director Ms. Linda F. Hill</p>
Libraries	<p>Upper Merion Library</p> <p>Upper Darby Township Free Public Library</p> <p>Montgomery County-Norristown Public Library</p>
Elected Officials—Federal	<p>United States Senate</p> <hr/> <p>Senator Robert P. Casey, Jr.</p> <p>Senator Patrick J. Toomey</p> <p>United States House of Representatives</p> <hr/> <p>Pennsylvania District 4 (King of Prussia study area) Representative Madeleine Dean</p> <p>Pennsylvania District 5 (69th Street Transportation Center study area) Representative Mary Gay Scanlon</p>
Elected Officials—State	<p>Senate of Pennsylvania</p> <hr/> <p>District 17 (King of Prussia study area) Senator Amanda Cappelletti</p> <p>District 26 (69th Street Transportation Center study area) Senator Tim Kearney</p> <p>Pennsylvania House of Representatives</p> <hr/> <p>District 149 (King of Prussia study area) Representative Timothy Briggs</p> <p>District 164 (69th Street Transportation Center study area) Representative Margo Davidson</p>

Elected Officials— County	Montgomery County Commissioners <hr/> Chair Commissioner Dr. Valerie Arkoosh Delaware County Council <hr/> Chairman Chairman Brian P. Zidek
Other Representatives	Norfolk Southern <hr/> Vice President Strategic Planning Mr. Michael R. McClellan Pennsylvania Turnpike Commission <hr/> Chairman Mr. Mark P. Compton Senior Engineering Project Manager Mr. Donald Steele. P.E. PECO Energy <hr/> Sr. Business Analyst Ms. Lori Natale Senior Account Manager Mr. Peter Kirlin

*A*ppendix G - Acronyms and Abbreviations

Appendix G Acronyms and Abbreviations

Acronym	Definitions
202	U.S. Route 202
4(f)	Section 4(f) of the USDOT Transportation Act
AADT	Average annual daily traffic
ACC	Agency Coordination Committee
ACP	Agency Coordination Plan
ACHP	Advisory Council on Historic Preservation
ACS	U.S. Census American Community Survey
ADA	Americans with Disabilities Act
ADT	Average daily traffic
AADT	Annual average daily traffic
AOC	Area of concern
APE	Area of potential effects
AUL	Pennsylvania Activity Use Limitation site
Ave.	Avenue
BHP	Bureau of Historic Preservation
BID	King of Prussia Business Improvement District
Blvd	Boulevard
BMP	Best management practice
Ca.	Circa
CAA	Clean Air Act
CEQ	Council on Environmental Quality
CERCLA	Comprehensive Environmental Response, Compensation and Liability Act
CFR	Code of Federal Regulations
CHOP	Children's Hospital of Philadelphia
CIG	Capital Investment Grant
CMP	Critical Habitat/Endangered Species Mitigation Plan
CO	Carbon monoxide
Co.	Company
CO ₂	Carbon dioxide
CRGIS	Cultural Resources Geographic Information System
CRP	Montgomery County's <i>Comprehensive Regional Plan</i>
CWG	Community Working Group
dB	Decibels
dBA	Decibel in A-weighted one-third octave band scale
DCNR	Pennsylvania Department of Conservation and Natural Resources
DEIS	Draft Environmental Impact Statement
DHHS	Department of Health and Human Services
DOE	Determination of eligibility
DOT	Department of Transportation
DVRPC	Delaware Valley Regional Planning Commission
ECP	Environmental Compliance Plan
EIS	Environmental impact statement

Acronym	Definitions
EJ	Environmental justice
EO	Federal Executive Order
ELGP	Economy League of Greater Philadelphia
EPA	United States Environmental Protection Agency
ESA	Environmental site assessment
FAST Act	Fixing America's Surface Transportation Act
FEIS	Final Environmental Impact Statement
FEMA	Federal Emergency Management Agency
FHWA	Federal Highway Administration
FIRM	Flood insurance rate maps
FONSI	Finding of No Significant Impact
FPPA	Farmland Protection Policy Act
FRA	Federal Railroad Administration
FTA	Federal Transit Administration
FY	Fiscal year
GIS	Geographic information system
GVFTMA	Greater Valley Forge Transportation Management Association
H	High
HCM	Highway Capacity Manual
Inc.	Incorporated
K	Thousands of dollars
KOP	King of Prussia
KOP-BID	King of Prussia Business Improvement District
KPMU	King of Prussia Mixed-Use
L	Low
Ldn	Cumulative noise exposure over a 24-hour period
Leq or Leq(h)	Equivalent sound level (hourly)
LOD	Limits of disturbance
LOS	level of service
LPA	Locally Preferred Alternative
LWCF	U.S. Land and Water Conservation Fund Act
M	Moderate
MAP-21	Moving Ahead for Progress in the 21 st Century Act
Mod.	Moderate
Montco	Montgomery County
MPO	Metropolitan Planning Organization
MSAT	Mobile source air toxics
N. or N	North
N/A	Not applicable
NAAQS	National Ambient Air Quality Standards
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
NHSL	Norristown High Speed Line
NMFS	National Marine Fisheries Service
NOI	Notice of Intent
NOR	Manayunk/Norristown Regional Rail Line

Acronym	Definitions
NPL	National Priority List
NPS	National Park Service
NR	National Register of Historic Places
NRCS	Natural Resources Conservation Service
NRHP	National Register of Historic Places
NS	Norfolk Southern Railroad
NTC	Norristown Transportation Center
NWI	National Wetlands Inventory
O&M	Operations and maintenance
O ₃	Ozone
PA	Pennsylvania
PADEP	Pennsylvania Department of Environmental Protection
PaGEODE	Pennsylvania Geological Survey Interactive Map
PAO	Paoli-Thorndale Regional Rail Line
PASDA	Pennsylvania Spatial Data Access
PASPGP	Pennsylvania State Programmatic General Permit
PATCO	Port Authority Transit Corporation
PECO	PECO Energy Company
PennDOT	Pennsylvania Department of Transportation
PHMC	Pennsylvania Historical and Museum Commission
PIP	Public Involvement Plan
PM _{2.5}	Particulate matter with an aerodynamic diameter less than 2.5 micrometers
PMT	Personal Miles Traveled
PNDI	Pennsylvania Natural Diversity Inventory
PNHP	Pennsylvania Natural Heritage Program
RCRA	Resource Conservation and Recovery Act
Rd	Road
RMS	Root mean square
ROD	Record of Decision
ROW	Right-of-way
S. or S	South
SAFETEA-LU	Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users
SC	Steering Committee
SEPTA	Southeastern Pennsylvania Transit Authority
SHPO	State Historic Preservation Officer
SIP	State Implementation Plan
SSA	Sole Source Aquifer
TAC	Technical Advisory Committee
TAZ	Traffic analysis zone
TCR	Transportation Conformity Rule
TIP	Transportation Improvement Program
TMA	Transportation Management Association
TOD	Transit oriented development
TP	PA Turnpike
TPH	Trains per hour

Acronym	Definitions
TPHPD	Trains per hour per direction
TPSS	Traction Power Substation
TRI	Pennsylvania's Toxic Release Inventory
UMT	Upper Merion Township
UMGA-TV	Upper Merion's public access channel
un	Unknown
UNT	Unnamed tributary
USACE	United States Army Corps of Engineers
US or U.S. or USA	United States
US 202	U.S. Route 202
USC or U.S.C.	United States Code
USACE	United States Army Corps of Engineers
USDOl	United States Department of the Interior
USDOT	United States Department of Transportation
USEPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
VAU	Visual assessment unit
V/C	Volume/capacity
VdB	Vibration velocity level in decibels
VFCR	Valley Forge Casino Resort
VFNHP	Valley Forge National Historical Park
VHT	Vehicle hours traveled
VMT	Vehicle miles traveled

*A*ppendix H Glossary of Terms

*A*ppendix H Glossary of Terms

A

Accessibility

(1) The ability of vehicles and facilities to accommodate the disabled and comply with the Americans with Disabilities Act (ADA).

(2) A measure of the ability or ease of all persons to travel among various origins and destinations.

Action Alternative

A project alternative that involves a major capital investment.

Advisory Council on Historic Preservation (ACHP)

An independent federal agency that provides a forum for influencing federal policy, programs, and activities as they affect historic and archaeological resources in communities and on public lands nationwide.

Adverse

A negative or unfavorable condition.

Air Pollution

Is a general term that refers to one or more chemical substances that degrade the quality of the atmosphere.

Alignment

The horizontal and vertical location of a roadway, railroad, transit route, or other linear transportation facility.

Alternatives

The set of transportation improvements or projects that are compared in the EIS to determine their effectiveness in serving as potential solutions to a transportation problem. Along with the set of “Action” Alternatives, there is a “No Action Alternative,” which evaluates the effects of not building a project. Alternatives may consist of different configurations, alignments, type of access control, or transportation modes and strategies.

Aquifer

A layer of permeable rock, sand, or gravel through which ground water flows, containing enough water to supply wells and springs.

Area of Potential Effect (APE)	The geographic area within which a transportation project may cause changes in the character of, or use of, historic properties. The APE is influenced by the scale and nature of the project, and there may be different kinds of effects caused by the undertaking.
At Grade	On the ground, at surface level.
At-Grade Crossing	Same as a “grade crossing.” A rail crossing with roadways or streets on the same level as the tracks, resulting in a level intersection of both modes. See grade separation.
Avoidance	The act of avoiding or keeping away from impacting on something or someone.
B	
Bus	Rubber-tired vehicles operating on fixed routes and schedules on roadways. Buses are powered by diesel, gasoline, battery, or alternative fuel engines contained within the vehicle.
C	
Capital Costs	The one-time expenses incurred to design and build a transit system.
Carbon Monoxide (CO)	Is a colorless and odorless gas, which is a product of incomplete combustion. CO is absorbed by the lungs and reacts with hemoglobin to reduce the oxygen carrying capacity of the blood. At low concentrations, CO has been shown to aggravate the symptoms of cardiovascular disease. It can cause headaches and nausea, and at sustained high concentration levels, can lead to coma and death. CO concentrations tend to be highest in localized areas because they are most affected by local traffic congestion, since motor vehicles are a major source of CO emissions.
Clean Air Act (CAA)	Federal legislation that sets air quality standards. Sometimes cited as CAAA, Clean Air Act and Amendments of 1990.
Connectivity	Connecting various transportation modes and services to minimize wait times between transfers and reduce overall travel time.
Construction Impact	Temporary impact that would occur while a project is under construction.

Constructive Use Impact

An impact adversely impacting activities on or enjoyment of a property without directly acquiring the property or any portion of the property. A new noisy project adjacent to a previously quiet outdoor theater would be an example of a constructive use impact.

Cultural Resources

Archaeological and historic resources eligible for or listed on the National Register of Historic Places. Cultural resources include buildings, sites, districts, structures, or objects having historical, architectural, archaeological, cultural, or scientific importance.

Cumulative Impact

Impact that “results from incremental consequences of an action when added to other past and reasonably foreseeable future actions.” The cumulative effects of an action may be undetectable when viewed in the individual context of direct and indirect impacts but can add to other changes and eventually lead to a measurable environmental change. Potential cumulative effects on the environment must be assessed as required by the National Environmental Policy Act (NEPA).

D

de minimis

Of insufficient significance. A *de minimis* contribution means that the environmental conditions would essentially be the same whether or not a proposed project is implemented. Used to evaluate impacts to parks under a 4(f) evaluation.

Dedicated Guideway

A right-of-way that is solely for use of transit vehicles and is not occupied by any other type of vehicle or by pedestrians. Dedicated guideway may be either grade-separated or protected by a fence or substantial permanent barrier.

Demand Forecasting

A technique of estimating the number and travel times of potential users of a system.

Design Speed

The speed used for design and relationship of the physical features of a highway or rail that influence vehicle operation. It is the maximum safe speed that can be maintained over a specified section of highway or rail when conditions are favorable (i.e., clear, dry, daylight).

Design Year

The year for which the facility is designed. The transit facility should be able to handle the traffic forecasted for that year, which is generally 20 to 25 years in the future.

Determination of Eligibility

The process of assembling documentation to render professional evaluation of the historical significance of a property. Departments of Transportation, in consultation with the State Historic Preservation Office, apply the National Register of Historic Places criteria when deciding matters of historical significance.

Displacement

Results in converting current residential or commercial uses to transportation use.

Dust Control

Controlling dust from exposed soils by minimizing the time soils are exposed, temporarily mulching, seeding or covering exposed soils, and/or spraying water on exposed soils.

Dwell Time

The time, in seconds, that a transit vehicle spends at each stop waiting for passengers to alight and board.

E

Easement

A temporary or permanent right to use the land of another for a specific purpose sometimes referred to as a “deed restriction.” Easements may be purchased from the property owner or donated by the owner.

Effects

Effects” and “impacts” are synonymous. Effects include ecological, aesthetic, historic, cultural, economic, social, or health, whether direct, indirect, or cumulative. Effects may also include those resulting from actions that may have both beneficial and detrimental effects, even if on balance the agency believes that the effect will be beneficial. Effects include (1) direct effects that are caused by the action and occur at the same time and place and (2) indirect effects that are caused by the action and are later in time or farther removed in distance but are still reasonably foreseeable. Indirect effects may include growth-inducing effects and other effects related to induced changes in the pattern of land use, population density or growth rate, and related effects on air and water and other natural systems, including ecosystems.

Eminent Domain

Authority of an agency to acquire property at fair market value for public purposes. Also known as condemnation.

Endangered

An organism of very limited numbers that may be subject to extinction and is protected by law under the Endangered Species Act.

Envelope	Definition of the vertical and horizontal space required for both the transit vehicle and/or the guideway. Also called operating envelope.
Environmental Impact Statement	A public document that a federal agency prepares under NEPA to document the expected impacts of a development or action on the surrounding natural and human environment. The document must detail efforts to avoid, minimize, or mitigate any adverse impacts.
Environmental Justice (EJ)	Presidential Executive Order 12898 requires federal agencies to ensure that their actions (or actions they oversee) do not disproportionately discriminate against or impact minority populations and low income populations.
F	
Fare Box Revenue	Value of cash, tickets, tokens, and pass receipts given by passengers as payment for rides; excludes charter revenue.
Feasible	Feasible means capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors.
FEMA	Federal Emergency Management Agency. FEMA has ten regional offices and two area offices. Each region serves several states, and regional staff work directly with the states to help plan for disasters, develop mitigation programs, and meet needs when major disasters occur.
Financially Constrained	A term used to describe the financial requirement that all projects must have an identified funding source.
FIRM	Flood Insurance Rate Maps. Maps produced by the Federal Emergency Management Agency (FEMA) to determine the locations of flood risks and hazards.
Full Acquisition	Purchase of all land ownership rights of a property. Also known as a “fee simple” acquisition.
Floodplain (100-year)	The area adjacent to a stream that contains a flood event that has a 1 percent probability of occurring in any given year.
G	
Geographic Information System (GIS)	A framework capable of capturing, storing, processing and manipulating geospatial data.

Grade	<p>(1) Refers to a rise in elevation within a specified distance. For example, a one-percent grade is a one-foot or 0.305 meter rise in elevation in 100 feet or 30.5 meters of horizontal distance.</p> <p>(2) The rate of upward or downward slope of a roadway, expressed as a percent.</p> <p>(3) “At grade” refers to a transportation facility built at ground level in a level intersection of both modes. See grade separation.</p>
Grade Separated Crossings	Facilities such as overpasses, underpasses, skywalks, or tunnels that allow pedestrians or vehicles to cross paths at different levels; also referred to as grade separations.
Grade Separation	The crossing of transportation rights-of-way that are separated vertically and for which there is no shared common intersection. A transit right-of-way may be fully grade-separated or partially grade-separated.
Groundwater	Subsurface water and underground streams that can be collected with wells or that flow naturally to the earth’s surface through springs.
Groundwater Recharge	A hydraulic process where water moves downward from surface water to groundwater.
H	
Hazardous Materials	Material, often waste, that poses a threat to human health and/or the environment.
Headway	The time interval between transit vehicles operating in the same direction along a fixed route.
I	
Impacts	See Effects.
Independent Utility	A project is said to have independent utility if it will provide functional transportation improvements that can stand alone and serve a major purpose, even if no other improvements are made in the region.
Indirect Effects (Secondary Impacts)	Impacts on the environment resulting from the primary impact of the proposed action but occurring later in time or farther removed in distance, although still reasonably foreseeable. Potential indirect or secondary and cumulative effects on the environment must be assessed as required by the National Environmental Policy Act (NEPA).

Intelligent Transportation Systems (ITS)

Computer-based technology applications designed to increase capacity, to move traffic and transit more safely and efficiently, and to supply information to travelers. Examples include global positioning systems for locating vehicles and traffic signal priority for giving preferential green time to transit vehicles at intersections.

Intermodal

The ability to connect, and the connections between, different modes of transportation.

K

Kiss-and-Ride

A drive-through area, sometimes with short-term parking, to allow passengers to be dropped off or picked up at a transit station, with or without a kiss.

L

Land and Water Conservation Fund (LWCF) Act 1965

Regulates the use of parklands that were purchased or developed with LWCF funds.

Level of Service (LOS)

Level of service (LOS) is a measure of the quality of operations of a roadway. It looks at speed, traffic volume and road geometry. LOS A represents free flow conditions and LOS F represents a breakdown of vehicular flow. Typically, in urbanized areas LOS D or better is considered adequate.

Limits of Disturbance

The horizontal boundary where soil will be exposed during construction activities. The limits of disturbance includes, but is not limited to, the limits of excavation, borrow areas, storage areas, staging areas, areas to be cleared and grubbed, and roadways.

Locally Preferred Alternative (LPA)

A project alternative chosen by a sponsoring agency as a result of the federal project development process. It defines the alternative that is deemed best suited to meet the region's transportation goals, is responsive to community concerns and input and has been examined and declared superior to the other alternatives that are identified and studied in relation to its social, economic and environmental impacts.

Logical Termini

Rational endpoint for consideration of transportation improvements and for review of environmental impacts.

Low-Income Household

A low-income household is one where the median household income is below the Department of Health and Human Services poverty guidelines.

Low-Income Population

Any readily identifiable group of low-income persons who live in geographic proximity, and if circumstances warrant, geographically dispersed/transient persons (such as migrant workers or Native Americans) who will be similarly affected by a proposed federal transportation program, policy, or activity.

M

Map Overlays

Quantitative and qualitative analysis using layering of maps showing land use and resource context from various time periods.

Minimization

Measures taken to reduce the severity of adverse impacts.

Minority

A person who is (1) Black (having origins in any of the black racial groups of Africa); (2)Hispanic (of Mexican, Puerto Rican, Cuban, Central or South American, or other Spanish culture or origin, regardless of race); (3)Asian American (having origins in any of the original peoples of the Far East, Southeast Asia, the Indian subcontinent, or the Pacific Islands); or (4)American Indian and Alaskan Native (having origins in any of the original people of North America and who maintains cultural identification through tribal affiliation or community recognition).

Minority Population

Any readily identifiable groups of minority persons who live in geographic proximity, and if circumstances warrant, geographically dispersed/transient persons (such as migrant workers or Native Americans) who will be similarly affected by a proposed federal transportation program, policy, or activity.

Mitigation

Measures taken to alleviate adverse impacts that remain after minimization.

Mixed-Use Development

Development with multiple categories of land use typically including residential, commercial, retail, and entertainment. Mixed-use areas generally have higher population densities and are pedestrian friendly.

Mobil Source Air Toxics (MSAT)

Are a subset of the 188 air toxics defined by the Clean Air Act. Most air toxics originate from human-made sources, including on-road mobile sources, non-road mobile sources (e.g., locomotives, airplanes), area sources (e.g., dry cleaners) and stationary sources (e.g., factories or refineries).

Mode	Refers to a specific form of transportation (auto, bus, LRT, heavy rail, pedestrian, bicycle, etc.).
Model	An analytical tool (often mathematical) used by transportation planners to assist in making forecasts of land use, economic activity, travel activity and their effects on the quality of resources such as land, air, and water.
Multimodal	Having or involving several modes of transportation.
N	
National Environmental Policy Act (NEPA)	The federal law that requires every federal agency to evaluate the effect of its proposed actions on the natural and man-made environment by preparing an Environmental Assessment or Environmental Impact Statement.
National Register Eligible	Cultural resources eligible for inclusion on the National Register of Historic Places. Eligible resources receive the same protection as listed resources.
National Register of Historic Places (NRHP)	A federal listing of historic resources protected under the National Historic Preservation Act of 1966. Properties include districts, sites, buildings, structures, and objects that are significant in American history, architecture, archeology, engineering, and culture.
New Starts	Discretionary federal funding program for the construction of new fixed guideway systems or extensions of existing fixed guideway systems, based on cost effectiveness, alternatives analysis results and the degree of local financial commitment.
No Action Alternative	The alternative describing projected future conditions of an area in the absence of a proposed project. It serves as a benchmark to which the impacts of the build alternatives can be compared. As part of this alternative, financially constrained and programmed projects are considered together with existing conditions.
Noise	Unwanted sound.
O	
Off-Board Fare Collection	Collection of transit fares off the vehicle, typically at a station. Boarding time is greatly reduced with off-board fare collection. When off-board fare collection is used, verification of fare payment is often made by random inspection onboard the vehicles.

Off-Peak Period	Periods of the day when travel activity is lower.
Operating and Maintenance Costs (O&M Costs)	All costs involved with running a transit system, including labor for operations and for vehicle and fixed facility maintenance, fuel and electric power, spare parts and other supplies, insurance premiums and claims payments, direct supervision, and general and administrative expenses.
Operating Plan	For transit, an operating plan details characteristics such as running times, frequency, required number of vehicles, changes in frequency throughout the day, and assumptions pertaining to stations.
Origin-Destination Study	A method to determine where trips are coming from and going to, or where they desire to travel.
Ozone (O₃)	Is a strong oxidizer and a pulmonary irritant that affects the respiratory mucous membranes, other lung tissues, and respiratory functions. Exposure to ozone can impair the ability to perform physical exercise, can result in symptoms such as tightness in the chest, coughing, and wheezing, and can ultimately result in asthma, bronchitis, and emphysema. Motor vehicles do not emit ozone directly. Emissions of volatile organic compounds (VOC) and nitrogen oxides (NO _x), which are the precursor pollutants to ozone formation, react in the presence of sunlight to form ozone in the atmosphere. These reactions occur over periods of hours to days during atmospheric mixing and transport downwind. Accordingly, ozone and its precursors VOC and NO _x are regulated at the regional level as part of the Delaware Valley Regional Planning Commission's (DVRPC) transportation plan.
P	
Park-and-Ride Facility	A parking lot to which passengers drive their cars, leave them for the day, and either board transit vehicles or carpool.
Partial Acquisition	Purchase of a portion of a property. A partial acquisition could include fee simple or easement acquisitions.

Particulate Matter (PM_{2.5})	Is made up of small solid particles and liquid droplets. PM ₁₀ refers to particulate matter with an aerodynamic diameter of 10 microns and smaller, and PM _{2.5} refers to particulate matter with an aerodynamic diameter of 2.5 microns and smaller. Particulates enter the body by way of the respiratory system. Particulates over 10 microns in size are captured in the nose and throat and are readily expelled from the body. Particles smaller than 10 microns, and especially particles smaller than 2.5 microns, can reach the air ducts (bronchi) and the air sacs (alveoli). Particulates, especially PM _{2.5} , have been associated with increased incidence of respiratory diseases such as asthma, bronchitis, and emphysema; cardiopulmonary disease; and cancer. The majority of PM emissions from mobile sources are attributed to diesel vehicles.
Peak (Peak Period, Rush Hours)	The period during which the maximum amount of travel occurs. It may be specified as the morning (a.m.) or afternoon or evening (p.m.) peak.
Performance Measures	Indicators of how well the transportation system is performing with regard to such things as average speed, reliability of travel, and accident rates. Used as feedback in the decision-making process.
Preliminary Engineering	At the preliminary engineering phase the design is approximately 30 percent complete. The deliverables at the 30 percent submittal includes contract drawings, specifications, design calculations and a preliminary cost estimate.
Public Hearing	A formal meeting held to receive public comment on proposed action.
Public Meeting	An informal meeting held to present information about the proposed action and to discuss it with the public.
Purpose and Need Statement	A project purpose is a broad statement of the overall objective to be achieved by a proposed action. Need is a more detailed explanation of the specific transportation problems that exist or are expected to occur in the future. It is the foundation to determine if alternatives meet the needs in the area.
Q	
Queue	A line of vehicles stopped at an intersection, merge or diverge point.

R

<u>Ridership</u>	The number of rides taken by people using a public transportation system in a given time period.
<u>Root Mean Square (RMS)</u>	Average vibration amplitude
<u>(Public) Right-of-Way (ROW)</u>	The area over which a legal right of passage exists; land used for public purposes in association with the construction or provision of transportation projects or other linear infrastructure and the associated facilities.

S

<u>Scoping</u>	This is the first step in the NEPA process that determines the range of proposed actions, alternatives, and impacts to be discussed in a DEIS. The required scoping process provides agencies and the public opportunity to comment. Scoping is used to encourage cooperation and early resolutions of potential conflicts, to improve decisions, and to reduce paperwork and delay.
<u>Section 106</u>	The section of the National Historic Preservation Act that requires federal agencies to consider the potential effects of proposed federal action on any known or potential historic, architectural, or archaeological resources and to consult with the SHPO.
<u>Section 4(f)</u>	Section 4(f) of the US Department of Transportation Act of 1966 includes a national policy to make special effort to preserve the natural beauty of the countryside, public parks and recreation lands, wildlife and waterfowl refuges, and significant historic sites. Use of these lands for a transportation project will be permitted only when it has been determined that there is no feasible and prudent alternative and the project includes all possible planning to minimize harm to the property resulting from such use.
<u>SHPO (State Historic Preservation Office)</u>	The office of the State Historic Preservation Officer, a state official in each state that is responsible under the National Historic Preservation Act of 1966 to review potential impacts to cultural resources by federal actions and to supervise the mitigation of adverse impacts.
<u>Shuttle Service</u>	Local bus service that moves passengers to collection points for bus or rail service.
<u>Soil Erosion and Sediment Control</u>	To reduce the uncontrolled movement of soils.

Stakeholders	Individuals and organizations involved in, or affected by, the transportation planning process, including federal/state/local officials, MPOs, transit operators, freight companies, shippers, and the general public.
State Implementation Plan (SIP)	The SIP is a state-adopted plan required for compliance with the Clean Air Act for regions that are not in attainment of the National Ambient Air Quality Standards. In the case of the King of Prussia/Valley Forge area, the DVRPC is responsible for developing a Transportation Improvement Program for the area that conforms to the SIP, which means that it does not create new violations of the Standards or make existing violations worse in the future.
Stormwater Management (SWM)	Physical design features such as ponds, bioretention, or drainage swales that retain or direct stormwater run-off in a manner that controls discharge volumes and/or water quality.
T	
Terminal Station	The bus or rail station where a route or line begins and ends.
Traffic Analysis Zone (TAZ)	A geographic area typically ranging in size from a city block to a one-square-mile section (or larger) used in computer models that identify changes in traffic flow based on estimated land use changes, population growth, employment growth, and other factors.
Transfer	The portion of a trip between two connecting transit routes.
Transportation Center	A station in a multi-destination transit system where passengers may conveniently transfer among trunk lines, local feeder routes, or modes. Also referred to as intermodal transfer facilities, transit centers, stations.
Transit Dependent Population	Generally those without their own means of transportation (e.g., zero-car households, children, low-income groups, some elderly, and those who are unable to operate a vehicle due to a physical disability).
Transit Oriented Development (TOD)	A term used for urban development that encompasses a direct and planned access to transit facilities.
Transit Zone	Communities within a one-half mile radius of transit facilities.

Transportation System User Benefit	A measurement of a project's value. The measurement divides the cost (including capital, and operations and maintenance) by the travel time savings of all users of the transit system (including existing and new riders). This measure is part of the FTA New Starts evaluations.
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Travel Demand Forecast	A projection for travel demand on future or modified transportation system alternatives using existing or projected land use, socioeconomic, and transportation services data.
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Travel Time	The average time required to travel between two points, including delays at intersections, but not including terminal or waiting time.
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Trends Analysis	Used to identify effects occurring over time and to identify the future context of land use and environmental resources of interest
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U

Uniform Relocation and Real Property Acquisitions Policies Act	Grants Management Requirements and State laws that establish the process through which SEPTA may acquire real property through a negotiated purchase or through condemnation.
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V

Viewshed	An area visible from a specific vantage point.
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W

Wetlands	As defined by the U.S. Army Corps of Engineers, areas that are inundated or saturated by surface water or groundwater sufficiently to support a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include swamps, marshes, and similar areas and are subject to protection under Executive Order 11990 and Section 404 of the Clean Water Act.
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*A*ppendix I - List of References

Appendix G List of References

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