

- (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.
 - a. No-Build Alternative

The No-Build Alternative would have no effect on historic properties.

- b. Preferred Alternative

The Preferred Alternative would have an adverse effect to historic properties. The Preferred Alternative includes refinements made since the DEIS to reduce impacts to historic resources. These refinements are described in **Chapter III. Table VI-12** provides a breakdown of effects to each of the seventeen architectural historic properties identified within the historic architectural APE (**Figure VI-8**). The Preferred Alternative would have an adverse effect on nine of these seventeen historic properties. As part of the Undertaking, the existing tunnel would essentially be “mothballed” and sealed, thus retaining it for a potential future transportation use. While the Preferred Alternative would still have an adverse effect on the B&P Railroad, the tunnel work would follow the Secretary of the Interior’s Standards for the Treatment of Historic Properties.

In addition, sections of the NEC would be taken out of service, including portions of the railroad alignment that contribute to the B&P Railroad historic district. Their disposition has not yet been determined so the assessment of effects to these historic properties is not possible at this time.

FRA’s continued consultation with MHT and other consulting parties to resolve the adverse effects (36 CFR Part 800.6(a)), including incorporation of their comments into the process of refining and selecting the Preferred Alternative, has aided in avoiding and minimizing adverse effects. Consulting parties’ comments with regard to effects to historic properties have included the following:

- Effects to the B&P Railroad tunnel as a result of this undertaking.
- The proposed size and location of the Intermediate Ventilation Facility in the Reservoir Hill Historic District and the overall high historic integrity of this District.
- Concerns about possible vibration impacts through the tunnels underneath the Reservoir Hill Historic District.
- Effects to a large number of contributing elements, including visual effects of the new retaining walls and potential size of the South Ventilation Facility, in the Midtown Edmondson Historic District.
- Effects to the American Stores Company Warehouse, Ward Baking Company, and Fire Department Engine House No. 36, all individually eligible for NRHP listing and contributing elements to the Midtown Edmondson Historic District.
- Effects to historic properties along Edmondson Avenue, which was historically a main thoroughfare for the West Baltimore area.
- The importance of the American Ice Company, especially its historic significance and visibility in the West Baltimore community.

More details of individual architectural historic property effects are provided in the *Architectural Historic Properties Effects Assessment Report*. On November 20, 2015, MHT concurred with FRA’s adverse effect determination. FRA also prepared a technical memorandum containing updates to the identified list of historic properties, adjusted mapping, additional property evaluations, and revised effects assessments due to revisions to Alternative 3B which were incorporated into the Preferred Alternative. The document also includes a clarification to the B&P Railroad historic district boundary. This memorandum, which did not change the overall adverse effect finding, was submitted to MHT and other consulting parties for review and comment on July 28,