



# CITY OF PHILADELPHIA

LAW DEPARTMENT  
One Parkway  
1515 Arch Street  
Philadelphia, PA 19102-1595

Sozi Pedro Tulante  
City Solicitor

April 14, 2016

Via E-Filing

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
Post Office Box 3265  
Harrisburg, PA 17105

Re: City of Philadelphia's Application for approval to reconstruct City Bridge No. 185 carrying Montgomery Avenue over the tracks of National Railroad Passenger Corporation ("AMTRAK") and Consolidated Rail Corporation ("CONRAIL"), all in the City of Philadelphia

Dear Secretary Chiavetta:

Regarding the above-referenced matter, enclosed please find the City of Philadelphia's original Application and Notice of Appearance which were filed electronically on the above date. Copies of the Application have been served in accordance with the Certificate of Service.

Thank you.

Respectfully,

A handwritten signature in blue ink that reads "Michele Sarkos".

Michele Sarkos

Deputy City Solicitor

cc: Attached Service List (w/encl)

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

In re: Application of the City of Philadelphia for : Docket No.  
approval of (1) the reconstruction of the bridge :  
carrying Montgomery Avenue (City Bridge #185) :  
over and above the tracks of National Railroad :  
Passenger Corporation ("Amtrak") and also :  
Consolidated Rail Corporation ("Conrail"), all :  
located in the City of Philadelphia; (2) exemption :  
from the minimum vertical clearances required by :  
52 Pa. Code, Section 33.121; and (3) allocation of :  
certain costs and expenses incident thereto. :

**NOTICE OF APPEARANCE**

Please enter our appearance on behalf of the City of Philadelphia in the above-captioned matter and add our names and address to the service list in this case.



Michele Sarkos, ID # 83436  
J. Barry Davis, ID # 62137  
City of Philadelphia, Law Department  
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Philadelphia, PA 19102-1595  
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Date: April 14, 2016

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

In re: Application of the City of Philadelphia for : Docket No.  
approval of (1) the reconstruction of the bridge :  
carrying Montgomery Avenue (City Bridge #185) :  
over and above the tracks of National Railroad :  
Passenger Corporation (MP 86.36) and also :  
Consolidated Rail Corporation located in the City :  
of Philadelphia, Philadelphia Co.; (2) exemption :  
from the minimum vertical clearances required by :  
52 Pa. Code, Section 33.121 and (3) allocation of :  
certain costs and expenses incident thereto. :

**APPLICATION**

1. The name and address of the Applicant is The City of Philadelphia, City Hall, Philadelphia, PA 19107.
2. The name and address of the attorneys for the Applicant are:

Michele Sarkos  
J. Barry Davis  
City of Philadelphia, Law Department  
1515 Arch Street, 16th Floor  
Philadelphia, PA 19102-1595
3. The City of Philadelphia ("City") is a municipal corporation and body politic and a City of the First Class, operating pursuant to a Home Rule Charter under Pennsylvania Law.
4. By this Application, the City seeks approval from the Pennsylvania Public Utility Commission ("Commission") for:
  - (a) Reconstruction of the bridge carrying Montgomery Avenue over and above the tracks of National Railroad Passenger Corporation ("Amtrak") and Consolidated Rail Corporation ("Conrail") in the City of Philadelphia;

- (b) Exemption from the vertical clearance requirement as required by 52 Pa. Code § 33.121; and
- (c) The allocation of certain costs and expenses incident thereto.

5. The general location of the crossing is shown on the map attached hereto as Exhibit "A."

6. The City's Preliminary Engineering Plans for the proposed structure are attached hereto as Exhibit "B."

7. The names and addresses of the persons, parties and entities concerned in, or affected by the bridge reconstruction project are attached hereto as Exhibit "C."

8. Funding for this project is anticipated to be 80% Federal; 15% Commonwealth of Pennsylvania and 5% Local.

9. The Montgomery Avenue Bridge is located along Montgomery Avenue between Sedgley Avenue and Glenwood Avenue in the City of Philadelphia.

Montgomery Avenue is oriented in the east/west direction.

10. The active railroad facilities in the project area consist of four (4) Amtrak electrified track and one non-electrified freight track leased by Conrail. Montgomery Avenue Bridge carries the two-way street over these tracks.

11. The existing bridge is a five span continuous, concrete encased steel girder-floorbeam-stringer bridge with a concrete jack arch deck. The two main girders and transverse floorbeams are concrete encased, riveted built-up members consisting of two angle flanges (top and bottom), variable depth web plates, and cover plates (top and bottom). All piers are reinforced concrete square columns or walls that are founded on

unreinforced concrete spread footings. The bridge skew angle is approximately 50 degrees.

12. The bridge was posted for a 10 ton weight limit on March 10, 1982.

13. The bridge now carries an average daily traffic of 2,037 vehicles per day and 102 trucks per day based upon a 2015 evaluation.

14. The reconstruction of this structure is necessary and proper in order to bring the load carrying capacity back up to current PennDOT legal standards and remove the load limit posting/structural deficiency rating. Reconstruction of the bridge will replace the significantly decayed and deteriorated girders, floorbeams, and stringers which have extensive concrete cracking and spalling. Cracking and spalling is widespread on the piers and abutments as well, resulting in exposed and corroded steel reinforcement, compromising the integrity of the structure. Topside, the bridge deck offers poor roadway sight conditions along with heavily cracked asphalt pavement. The concrete jack-arches underneath the deck are also cracked throughout with areas of spalling. The rehabilitation will remove the need to perform preventative maintenance to keep the railroad tracks safe. The existing sidewalks are severely cracked and are not fully accessible and are overgrown with vegetation.

15. The existing superstructure and substructure will be demolished. The City of Philadelphia proposes constructing an entirely new superstructure and substructure. The proposed superstructure is a 217' long, three-span continuous, steel plate multi-girder bridge founded upon two reinforced concrete integral abutments on piles and two full height reinforced concrete piers on spread footings. There are 7 beams equally spaced at 7'-7" with a skew angle of 50°. The overall bridge width of 52' is comprised of a 34'

cartway and two 8' sidewalks. The roadway will have one 10' lane of traffic in each direction with 7' shoulders. The sidewalks will run the entire length of the bridge on either side of the roadway.

16. The proposed piers will be located in approximately the same position as the existing piers and provide the required horizontal clearance for service roads adjacent to railroad tracks.

17. The approach work will consist of:

- Full depth roadway reconstruction is planned roughly 200' past the end of the structure on both approaches. The approach slabs on both sides will be roughly 25' long, and with a full width of 56'-5". The approach roadway will be repaved with historic bricks roughly 150' past the end of approach slab on both sides. In addition, ADA curb ramp will be installed at all three intersections within the project limits.
- New retaining wall will be place at northeast corner and a new cap will be placed on the southeast existing retaining wall.
- Care will be taken to protect the PWD sewer main that runs under the railbed.
- PECO poles and various wires in the vicinity of the bridge must be relocated to permit installation of approach slabs and to facilitate construction.

18. The City proposes to raise the vertical alignment of the proposed bridge.

The proposed vertical clearance will be increased from existing conditions to the greatest extent possible, as shown in the table below.

<b>TRACK NUMBER</b>	<b><i>EXISTING</i></b>	<b>PROPOSED</b>
Amtrak Track #1	21'-5"	23'-0"
Amtrak Track #2	20'-10"	22'-4"
Amtrak Track #3	19'-11"	20'-11"
Amtrak Track #4	19'-2"	19'-8"
Conrail Track #0	21'-7"	22'-7"

19. The City proposes to reconstruct the bridge piers. The proposed horizontal clearance will be increased from existing conditions to the greatest extent possible, as shown in the table below.

<b>TRACK NUMBER</b>	<b><i>EXISTING</i></b>	<b>PROPOSED</b>
Amtrak Track #1	7'-6"	30'-6"
Amtrak Track #4	8'-2"	20'-6"
Conrail Track #0	7'-10"	12'-6"

20. The City has provided Amtrak and Conrail with the existing and proposed vertical and horizontal clearances and has requested that Amtrak and Conrail accept the proposed clearances. Amtrak and Conrail are still reviewing the information; therefore, the City will keep the PUC apprised of the outcome of the reviews.

- 21. The reconstructed bridge will not have any load restrictions.
- 22. No utilities are located on the existing bridge.
- 23. All non-railroad utilities should be ordered to furnish all material and to perform all work necessary to relocate their facilities to accommodate this reconstruction project at the utilities' sole cost and expense.

24. The City anticipates soliciting bids for the reconstruction of the bridge in December of 2016 and anticipates issuing a Notice to Proceed in April of 2017.

25. If all parties cooperate in this project, construction should take approximately two years. The bridge will be closed to all motor vehicle and pedestrian traffic during construction. Vehicular traffic will be detoured during construction as follows: for westbound traffic, follow Glenwood Avenue south to Oxford Street west to 33<sup>rd</sup> Street north; for eastbound traffic, follow 33<sup>rd</sup> Street south to Oxford Street east to Glenwood Avenue north. The pedestrians will be detoured as follows: Glenwood Avenue to Cecil B. Moore to 31<sup>st</sup> Street, or in reverse. SEPTA bus routes will not be affected by the construction of this bridge.

26. The proposed vertical clearances are less than the minimum overhead clearances above railroad tracks, used or proposed to be used for transporting freight cars, as set forth in 52 Pa. Code § 33.121. However, the City requests that the Commission rule that the vertical clearance rule in 52 Pa. Code § 33.121 does not apply at this crossing because the allowance for improvement is limited due to existing roadway profile constraints and adjacent tie-in points.

27. In the event that the Commission determines that the vertical clearance rule applies at this location, the City proposes to enter into a Joint Stipulation for Exemption Application with Amtrak and Conrail stating that the parties have no objection to a vertical clearance exemption in this proceeding.

28. The proposed reconstruction of the crossing, as described herein, is compatible with the public interest, safety and well being.

**WHEREFORE**, The City of Philadelphia respectfully requests that the  
Commission:

1. Conduct a field conference as promptly as possible;
2. Approve this application and the attached plans;
3. Rule that the vertical clearance rule in 52 Pa. Code § 33.121 does not apply at this crossing;
4. Order all non-railroad utilities to furnish all material and perform all work necessary to relocate their facilities to accommodate this reconstruction project at the utilities' sole cost and expense;
5. Order all other concerned parties, at their initial cost and expense, to furnish all materials and do all work which may be required on their respective facilities in connection with this project and to fully cooperate with the City of Philadelphia, its consultants and contractors in the design and construction of the bridge;
6. Order all parties to timely review all submissions of the City of Philadelphia and its consultants and contractors in the design and construction of the bridge; and
7. Conduct a formal hearing, if necessary, for the allocation of costs incurred and not already allocated after reconstruction of the bridge is completed.

Respectfully submitted,

The City of Philadelphia

By: Michele Sarkos

Michele Sarkos, ID # 83436

J. Barry Davis, ID # 62137

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**EXHIBIT "A"**

**MAP**

**EXHIBIT "B"**

**PLANS**

**EXHIBIT "C"**

**CERTIFICATE OF SERVICE**

**CERTIFICATE OF SERVICE**

I hereby certify that I am causing true copies of the City of Philadelphia's Application for Reconstruction of Montgomery Avenue Bridge carrying Montgomery Avenue over and above tracks of AMTRAK and CONRAIL, which was filed electronically, to be sent by regular U.S. mail to each INTERESTED PARTY listed below:

**Amtrak**  
**National Railroad Passenger Corporation (AMTRAK)**  
**30<sup>th</sup> Street Station**  
**5N-014**  
**2955 Market Street**  
**Philadelphia, PA 19401**

**AMTRAK**  
**ATTN: Richard Cianfrini, AIA**  
**30<sup>th</sup> Street Station**  
**4S-032, Box 64**  
**2955 Market Street**  
**Philadelphia, PA 19104**

**AMTRAK**  
**Dennis Moore, Esquire**  
**400 North Capital Street**  
**Washington, D.C. 20001**

**City of Philadelphia**  
**Department of Streets**  
**ATTN: Kristin Del Rossi**  
**G Street & Ramona Street**  
**Philadelphia, PA 19120**

**Conrail**  
**ATTN: Anthony DiArenzo**  
**1717 Arch Street, 13th Floor**  
**Philadelphia, PA 19103**

**PECO**  
**ATTN: Lou Robinson**  
**830 S. Schuylkill Avenue**  
**Philadelphia, PA 19146**

**Philadelphia Water Department**  
**ATTN: William Dobbins**  
**1101 Market Street, Aramark Tower, 2<sup>nd</sup> Floor**  
**Philadelphia, PA, 19107**

**Southeastern Pennsylvania Transportation Authority (SEPTA)**  
**ATTN: Robin K Youmans**  
**1234 Market Street, 13<sup>th</sup> Floor**  
**Philadelphia, PA 19107**

**PennDOT**  
**ROW & Utility Division – Bureau of Design**  
**ATTN: Rosemary Chiavetta**  
**P.O. Box 3362**  
**Harrisburg, PA 17105-3362**

**PennDOT**  
**Gina M. D’Alfonso, Esquire**  
**Office of Chief Counsel**  
**Keystone Building, 9<sup>th</sup> Floor**  
**400 North Street**  
**P.O. Box 8212**  
**Harrisburg, PA 17105-3265**

**PA Public Utility Commission**  
**Lawrence Barth, Esquire**  
**Law Bureau**  
**Keystone Building, 3<sup>rd</sup> Floor**  
**400 North Street**  
**P.O. Box 3265**  
**Harrisburg, PA 17105-3265**



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Date: April 14, 2016