



IN REPLY REFER TO:

United States Department of the Interior

NATIONAL PARK SERVICE
Philadelphia Support Office
U. S. Custom House - 3rd Floor
200 Chestnut Street
Philadelphia, PA 19106



June 21, 2001

Mr. Robert Eppley, Jr.
Pennsylvania Department of Transportation, Region 6
Engineering District 6-0
7000 Geerdes Boulevard
King of Prussia, PA 19406-1525

Re: Tincum Creek, Geigel Hill Road Bridge

Dear Mr. Eppley:

We have revised our opinion regarding the replacement of the Geigel Hill Bridge and believe that rehabilitation of the existing bridge is the preferred alternative. This is based on the May 21st Geigel Hill Road site visit, direction from the recently organized Lower Delaware National Wild and Scenic River Management Committee, and the fact that the 1997 Geigel Hill MOA with PHMC on historic issues is no longer in effect.

The Geigel Hill Road Bridge replacement project is located on Tincum Creek, which was designated into the National Wild and Scenic Rivers System on November 1, 2000. Designated rivers are protected by Section 7(a) of the Wild & Scenic Rivers Act. Pursuant to Section 7(a): "no department or agency of the United States shall assist by loan, grant, license, or otherwise in the construction of any water resources project that would have a direct and adverse effect on the values for which such river was established." The Service considers water resource projects to include dams, diversion projects, bridge and roadway projects involving construction in the bed or on the banks of the river, bank stabilization projects and activities that require a section 404 permit from the Army Corps of Engineers.

The proposed bridge crossing will significantly and adversely affect values and resources for which the Tincum Creek was designated into the Wild and Scenic Rivers System.

First, replacement of the existing steel truss bridge and natural stone retaining walls adversely affects the scenic and historic value for which the Tincum Creek is classified as a scenic river. It removes a contributing resource from the Ridge Valley Rural Historic District. The historic district was identified as an outstandingly remarkable resource in the Lower Delaware National Wild and Scenic River Study Report and was crucial to Wild and Scenic River eligibility for the Tincum. The historic district registration form identifies six bridges as contributing resources and states that, "as a collection, the bridges of the Ridge Valley strongly reflect two themes:

early settlement and transportation changes." Geigel Hill Road Bridge is the oldest existing bridge in the district. In addition, the Criteria of Effects Report, Geigel Hill Road Bridge Replacement Project, February 1997, states that "the removal of the contributing bridge from the historic district will have an Adverse Effect on the Ridge Valley Rural Historic District."

Second, installation of a box culvert replacement bridge will inhibit the free flowing character of the stream. A primary criterion for a National Wild and Scenic River is that it be maintained in a free flowing condition. The National Park Service generally prefers clear span bridges with abutments out of the floodplain. Proposed alterations to the west of the bridge will raise the roadway by approximately two feet and impede the floodplain. We believe these proposed impediments to stream flow and the floodplain will increase scouring above and below the bridge and increase stream bank erosion.

To maintain the free flowing, historic and scenic values of the Tinicum Creek we recommend that the existing bridge be rehabilitated as a truss bridge or reinforced with "I" beams if necessary.

Thank you for consulting with the National Park Service. Please call me at 215-597-1655 if you have any questions.

Sincerely,

William Sharp, Project Manager
Stewardship and Partnerships

cc: Lawrence M. Slavitter
Linda Wieand
Ann Safley