

Ed Rodgers
Delaware Riverkeeper Network
925 Canal Street, Suite 3701
Bristol, PA 19007

June 14, 2013

Dear Mr. Rodgers,

The following letter is written in response to your request to review the potential impact of replacing the Headquarters Road Bridge as well as the effects of rehabilitating the existing span, historically known as the Burnt Mill Bridge, in Tinicum Township, Bucks County, Pennsylvania. The Delaware Riverkeeper Network is a consulting party in the Section 106 process for PennDOT's proposal to replace the historic Headquarters Road Bridge and this correspondence is written in support of those efforts. As the researcher and preparer of the Ridge Valley Historic District nomination some twenty years ago my remarks and observations are offered here with the hope that a fair and reasonable outcome can be reached by all parties that maintains the historic integrity of this rare and significant historic resource, and that has no adverse impact on the Ridge Valley Historic District or the exceptional value of the Tinicum Creek.

In preparing this letter, a review was made of several documents that were provided. In 2006 the Army Corp of Engineers sought a determination of National Register Eligibility for the Bridge on Headquarters Road. Although the bridge was already listed as a contributing structure to a listed National Register Historic District, the State Historic Preservation Officer determined the bridge to be not eligible. This finding appears contrary to fact and no explanation is given as to how the SHPO could determine a National Register listed historic resource not eligible. However, the determination of eligibility also went to the Secretary of Interior who indeed determined the bridge eligible under criterion A for architecture and criterion C for agriculture. It is my opinion that the determination of eligibility should be sent back to the State Historic Preservation Officer with a letter outlining the importance of this bridge to review again, with the hope that reconsideration might yield a supportive determination.

In a document written to call for support in preserving the bridge, the rarity of the pier-to-pier design of the Headquarters Road Bridge was made clear. Based on an examination of PennDOT's statewide bridge survey in 2003, there were only eight working bridges in Pennsylvania built before 1812. All were of the more common stone arch construction design. Based upon this data, the Headquarters Road Bridge is the oldest surviving pier-to-pier bridge left in Pennsylvania. This bridge was modernized in 1919 during the early automobile era with a new concrete deck with railings, designed by noted engineer and architect Oscar Martin, replacing the earlier wooden deck that once spanned the piers. While this was an open bridge and not a covered bridge, the design of the surviving 1812 abutments and piers mirrors the designs used on covered bridges particularly the numerous Delaware River crossings between Pennsylvania and New Jersey. In 1992 when the Ridge Valley district was first placed on the National Register it was not known that this bridge was of such an early date. If those facts were known, more significance would have been given to the bridge in the nomination.

The Headquarters Road Bridge is the point of convergence for one major portion of the district. The bridge ties together four roadways that follow creeks and drop down in elevation to a relatively flat plain where Christian Fretz built his grist mill in the eighteenth century. A bird's eye view of the road pattern converging at the bridge looks like two back to back parentheses)(. Two of the legs are Headquarters Road, one is Red Hill Road, and the fourth is Sheep Hole Road, which is the most significant roadway in the district because of its dirt surface. Approaching the bridge from any of these roads is dramatic. The loud sounds of water flowing down the Tincum Creek and its tributaries, combined with a sense of dropping down to the lower elevation of the bridge and mill site, creates a sense of place, a feeling of arrival, and with the convergence of four roadways the bridge, in its current alignment and one lane configuration, provides the visitor with a bridge experience little changed in over 200 years.

Removing the Headquarters Road Bridge and building a modern two lane bridge would cause significant damage to the historic integrity of this portion of the Ridge Valley Historic District. One of the key themes of the Ridge Valley Historic District was the interplay of man-made roadways and natural waterways. The district is mostly a series of narrow, twisting, rising and falling roads following creeks. There were six bridges and two fords in the district. The Headquarters Road Bridge is the oldest in the district as all nearly all the other bridges were built in the auto era to replace fords. In terms of significance, the Headquarters Road Bridge is the most significant in the district due to its age, design, and rarity. The ninety degree turns onto Sheep Hole Road and Headquarters Road on the one side of the bridge would likely lead to a change in bridge alignment that could impact the archeological remains of Fretz's Mill. Changes in bridge alignment would also ruin the relationship of the bridge to the mill site and the road network that has remained intact for over two centuries. The intrusion of a modern two lane replacement bridge would significantly diminish the integrity and the feeling of the Fretz Mill portion of the Ridge Valley Historic District. The existence of this bridge in a listed historic district provides good cause to sensitively renew this span with a new deck as detailed in the engineering report submitted in 2011 by McMullan & Associates.

The Headquarters Road Bridge brought farmers to Fretz's mill from four directions and the house and bridge are sited in view of each other. As a miller, Christian Fretz was a significant man in the local farming community and he accrued some wealth as seen in the Georgian architecture of his fine home. Fretz's standing in the community and his status are apparent in the way that his stone house, the bridge, and the mill site serve as a central axis to the roads that converge at this rural agricultural industrial site. Christian Fretz's stone farmhouse stands at the junction of Headquarters and Red Hill Road which combine briefly in a straight approach to the bridge and then split after the bridge with ninety degree turns onto Sheep Hole and Headquarters Road.

The bridge plays a critical role in defining the central axis of this part of the historic district and the bridge alignment, use of red shale for abutments and piers, and one lane scale tie the bridge into the landscape and are in sync with the winding, narrow, and scenic roadways that meet at the bridge. Perhaps the most interesting travel leg in this area is the approach made on Sheep Hole Road, a narrow dirt road barely two lanes wide that follows the Tincum Creek to the bridge. Traveling down this road along the creek under a dense tree canopy and at the end glimpsing the red shale lozenge shaped bridge piers that date back to 1812 is truly a journey that

engenders a sense of traveling back in time into the nineteenth century. Such remnant surviving road landscapes in Pennsylvania are extremely rare, and to imagine the change that would come from finding a realigned modern concrete span at the end of the dirt Sheep Hole Road seems an avoidable tragedy in the management of the Commonwealth's historic resources and National Register listed rural landscapes.

The Tincum Creek is a federally listed Wild and Scenic River and a state listed Exceptional Value watershed. To my knowledge, no written discussion has occurred about the potential impact of a bridge replacement and/or realignment on the exceptional value of the Tincum Creek. The Wild and Scenic Rivers Act (WSRA) requires the National Park Service to evaluate whether a "water resources project," which includes bridge replacement projects, will have an adverse effect on a wild and scenic river or tributary. The requirement is found at 16 U.S.C. section 1278(a) and is referred to section 7 of the WSRA. In addition, The WSRA contains several provisions designed to protect designated rivers and their environments. Foremost among these is Section 7 which provides that "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, as determined by the Secretary charged with its administration." When a water resources project, which includes bridge construction projects, is found to have a "direct and adverse effect" on a wild and scenic river, the project cannot be authorized or funded absent congressional intervention. The most significant historic resource associated with the Tincum Creek is the Headquarters Road Bridge.

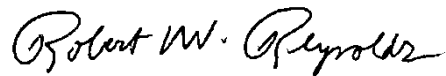
I would argue the this district is nationally significant for it encapsulates the rise of upper Bucks County from a farming region with distinctive English and Quaker vernacular architecture into a region colonized by artists and celebrities in the 1930s. The Ridge Valley district featured sculptor Charles Rudy and screenwriter John Wexley. Tincum Township was also home to actress Miriam Hopkins, song writer Jerome Kern, humorist Dorothy Parker, playwright S.J. Pearlman, and writer James Michener. All were attracted to the rustic rural landscapes of this region. Beyond Tincum there were artists colonies in Solebury Township at Philips Mill and the small town of New Hope became an artistic sanctuary of international renown. Wexley and Rudy lived on Sheephole Road near the Headquarters Bridge and along the Tincum Creek. In an interview with Charles Rudy's widow the rural beauty and simple living at a modest price was the main impetus for buying their farm and moving out of New York City. Lorraine Rudy spoke about how the rural countryside of the Ridge Valley Historic District allowed a lifestyle that informed and made possible her husband's creative endeavors.

Bucks County has a national reputation as a sanctuary for artists and the Ridge Valley Historic District is the single best example of a surviving remnant landscape that continues to look and feel like the Bucks County landscape of nearly one hundred years ago that attracted creative people to settle on the back roads of a rural area rich in stone vernacular architecture and a landscape of fields and forests and streams and roadways. The Headquarters Road bridge with its associated roadways and the motorist experience that can still be had traveling through that portion of the Historic District still retains the integrity needed to reveal the power of place that much more of Bucks County was once known for. Take out that one lane bridge that has stood since 1812 and the historic associations of water and roadways would be irreparably damaged.

The Geigel Hill Road Bridge, which also resides within the Ridge Valley Historic District, witnessed many years of effort to achieve a replacement design that all parties could accept. The character defining pony trusses were preserved and integrated into a new one lane design and red shale was integrated into the abutments. The character defining features of the Headquarters Bridge are the abutments and lozenge shaped piers as well as the alignment. Maintaining those features, keeping the bridge one lane and replacing the deck would result in a new bridge that continues to contribute to the historic district. Keeping the alignment and maintaining the scale of the existing bridge would surely have less impact on the wild and scenic Tincum Creek than a realigned larger two lane span would have.

Thanks for the opportunity to provide this information to you and it is my hope that a sympathetic outcome results from the Section 106 process. Please contact me if there is anything more I am able to do to help in this matter.

Sincerely,

A handwritten signature in black ink that reads "Robert W. Reynolds". The signature is written in a cursive, flowing style with a large initial 'R'.

Robert W. Reynolds