

Incorporated March 12, 1738

TINICUM TOWNSHIP

Bucks County

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January 3, 2025

Pennsylvania Department of Transportation, District 6-0 (via email)
Attention: Monica Harrower (MHarrower@pa.gov)
7000 Geerdes Blvd
King of Prussia, PA 19406

Subject: Golden Pheasant Bridge
PennDOT Cultural Resource Analysis/ Section 106 Consulting Party Response
River Road Bridge over the Delaware Canal, SR0032-BDC, MPMS#86244
ER Project# 2021PR07223.003
Tinicum Township
File No. 133-001

Dear Ms. Harrower,

Please allow this letter to serve as the comments of 106 Consulting Party, Tinicum Township, relating to PennDOT's Revised Alternatives Analysis Report (hereinafter "Revised Report") of the River Road Bridge over the Delaware Canal (hereinafter the "Golden Pheasant Bridge"). It is our understanding that the Revised Report is required as part of the required project clearances being sought from the Pennsylvania State Historic Preservation Office (hereinafter "PA SHPO"). On December 3, 2024 the Township requested an extension of the comment deadline from December 20, 2024, and you afforded the Township an extension until today. It should be noted that PA SHPO expressed concurrence with Alternative 3 on December 3, 2024, well before the comment period closed and without considering Tinicum Township's comments herein.

Tinicum Township held a special public meeting on December 9, 2024 to discuss the Revised Report and to receive comments from the Township's Chief of Police, Roadmaster, and members of the public. The Chairperson provided a summary of PennDOT's first Alternatives Analysis Report (hereinafter "1st Report") presented at a virtual 106 Consulting Party meeting on October 20, 2022, the Township's comments thereon submitted by letter on November 2, 2022, PennDOT's purpose and needs statements from both the 1st Report and the Revised Report, the six (6) alternative scenarios described in the Revised Report, and PennDOT's recommendation in support of Alternative 3.

The Township recognized and expressed appreciation for PennDOT's significant modification of the purpose and need statements following receipt of the Township's November 2022 comments. Specifically, PennDOT's explicit purpose in the 1st Report was to accommodate trucks greater in length than 45 feet on the Golden Pheasant Bridge, and PennDOT identified four distinct needs: (1) substandard bridge width, (2) a substandard horizontal curve radius, (3) a substandard sight distance, and (4) substandard design speed.

However, in the Revised Report currently under consideration, PennDOT's stated purpose is now simply to provide a safe and reliable crossing over the Delaware Canal, and identified three project needs: (1) addressing current crashes and crash damage, (2) insufficient driver predictability/expectancy relating to sight distance deficiencies and sharp and tight horizontal approach geometry, and (3) damaged road side barrier systems and substructure elements. While the Township agrees generally with the purpose and need statements in the Revised Report, the Township does not fully support Alternative 3 as the most appropriate remedy for the following reasons.

The paramount and resounding concerns of the Township regarding the Golden Pheasant Bridge are: reducing truck traffic and restricting large trucks from the insufficient River Road corridor and maintaining the historical integrity of the canal and surrounding area. The status quo is not tenable for the Township. The Township seeks a solution that will prevent large trucks from striking and getting stuck on the Golden Pheasant Bridge which results in frequent road closures, increased maintenance costs, and undue burden to taxpayers. The Township wants the Golden Pheasant Bridge to be a safe and efficient passageway for motorists excluding large trucks. The minutes from the December 9, 2024 meeting, which was both substantive and productive, are incorporated herein by reference in their entirety and will be provided to you once approved on January 6, 2025.

Unfortunately, an alternative that would resolve the Township's paramount concerns was not included in the Revised Report. The Township respectfully urges PennDOT to restrict large combination truck/trailer traffic from traveling along the River Road corridor. The road itself is heavily deteriorating and there are minimal places for such large vehicles to turn around or exit the roadway. Allowing large trucks to travel this corridor results in additional damages to the road network and unexpected delays to motorists, which significantly and frequently burdens Tinicum Township's police and public works resources. Large heavy trucks also create vibrations which may undermine or otherwise damage historic stacked stone cellars and structures that exist along the corridor.

The Township urges PennDOT to investigate other alternatives, such as a hybrid between Alternative 3 (without traffic signals) and Alternative 4 (without excessive widening), which, **in combination with a restriction on large trucks**, could meet the current purpose and needs statements, as well as resolve the paramount concerns expressed by the Township.

This potential alternative would slightly widen the existing approximately 19.5 feet wide bridge, in a historically sensitive manner, using the principles described in Alternative 4, but not to an excessive width of 43.5 feet as identified in the Revised Report. The widening should be limited to accommodate two lanes, but not a design that allows large trucks to pass each other at travel speeds. Reducing the width of the expansion would also make the necessary transitions to the canal access boat launch and pathway more manageable. Significantly, reducing the width of the expansion would minimize or eliminate the need for large retaining wall structures along the Delaware Canal. The retaining wall structures described in Alternative 4 would be an anomaly and an eyesore along the historic Delaware Canal which extends uninterrupted for approximately 61 miles, and passes through the entire length of the easternmost side of Tinicum Township. It is worth noting that the Delaware Canal received a National Historic Landmark Designation in 1976, and has been on the National Registry of Historic Places since 1974.

This hybrid alternative would also allow for the elimination of lighted traffic signals which would have a direct negative impact on the Golden Pheasant Inn, a historic gem cherished by the community, as well as other historic resources in the area. The elimination of traffic lights, controller boxes, and signal posts/mast arms would also contribute positively to the historic district viewshed while not burdening taxpayers with expensive and on-going traffic signal maintenance. At least one of the landowners where the concept plans identified signal lighting

going traffic signal maintenance. At least one of the landowners where the concept plans identified signal lighting expressed that they were not in support of providing land or easements to accomplish installation of lighting and lighting control equipment. The elimination of lighting signals could also lower the amount of easement/ land acquisition costs for the project as well as result in a direct reduction of project costs. In addition, the elimination of proposed signal lights would contribute to the night sky initiative which benefits wildlife and natural resources.

It was recommended that the use of stop signs and stop bar striping be evaluated/ implemented, as these features would help slow traffic in the corridor (without causing excessive backup of traffic due to signal light phasing), which is especially important for the safety of customers backing out of the parking spaces for the Golden Pheasant Inn, as well as motorists traveling the corridor. Slowing the traffic will additionally allow the vehicles to navigate more safely over the bridge structure resulting in less incurred damage, delays, and wasted public resources.

By incorporating the identified features into a comprehensive hybrid design alternative, this project may be able to proceed in a way that is beneficial to all stakeholders and with little to no impact on the historic resources in the area. The Township takes this opportunity to remind PennDOT that its project on the Golden Pheasant Bridge will impact thousands of individuals who live and travel through Tincum Township every week. This project will also have an impact on the dozens of businesses along Route 32 in and beyond Tincum's borders; many of these businesses were hit hard in the aftermath of Hurricane Ida when Route 32 was closed south of Point Pleasant. The historic resources in Tincum, as well as to the north and south, attract tourists and visitors to the region throughout the year and particularly in warmer months. The economic impact of a Route 32 closure, for any length of time, on these businesses must not be overlooked.

The Golden Pheasant Bridge is among the most important historic resources in Tincum, and the Township welcomes the opportunity for even more collaboration and frequent engagement with PennDOT in this early stage as PennDOT considers how to proceed. The Township reiterates the urgent need for PennDOT to restrict large trucks from the River Road corridor, and asks PennDOT to work with its design consultants to analyze the above described hybrid alternative.

Very truly yours,



Eleanor M. Breslin, Esq.
Chairperson

Cc: Scott C. Holbert, Esq., Township Solicitor (via email)
Curt Genner, Township Engineer (via email)
Judith Danko, Township Manager (via email)