

**National Society for
the Preservation of
Covered Bridges, Inc.**



William S. Caswell, Jr.
535 Second NH Tpke
Hillsboro, NH 03244
E-mail: nspcb@yahoo.com

HELP PRESERVE OUR HERITAGE
www.coveredbridgesociety.org

November 10, 2016

Kris Thompson, Environmental Unit
PennDOT District 5-0
1002 Hamilton Street
Allentown, PA, 18101

Dear Ms. Thompson,

Thank you for the invitation to attend the November 10th meeting regarding the Dreibelbis Station Covered bridge work. Unfortunately, we will not be able to attend in person so I am sending along these comments on the Draft Determination of Effects Reports for the project.

Our mission is to preserve our nation's remaining historic covered bridges. Ideally, we desire to see all bridges treated according to the preservation standards of the Secretary of the Interior's Standards for the Treatment of Historic Properties. In this instance, the report states that the project is being designed in accordance with the rehabilitation standards of that document. I beg to differ. Rehabilitation is defined as *"the act or process of making possible a compatible use for a property through repair, alterations, and additions while preserving those portions or features which convey its historical, cultural, or architectural values."*

There are a number of those standards which are not being met.

"The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces, and spatial relationships that characterize a property will be avoided."

This project proposes to replace the existing concrete-encased stone abutments with new concrete abutments. This is clearly removal of distinctive materials. It also proposes to replace the existing timber floor system with steel beams. This substantially changes the relationship between the trusses and floor system which work together to support the live loads of the structure. When considering the weight capacity of the structure, note that this bridge's lower laterals frame into the bottom chord. We feel that this provides an opportunity to strengthen the floor beams to handle the increased loads and maintain a working floor system supported by the trusses.

"Distinctive materials, features, finishes, and construction techniques or examples of craftsmanship that characterize a property will be preserved."

Berks County used a distinctive style of latticed lower lateral bracing, found in Dreibelbis Bridge, Red (Wertz) Bridge, Greisemer's Mill Bridge, and probably others now gone. Replacing the deck with steel beams, would eliminate this feature, and is therefore an unacceptable historic preservation practice. This feature is a significant example of Berks County regional architecture.

“Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture, and, where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.”

If there are timbers which are damaged or deteriorated to the point where they are no longer suitable, the standards for rehabilitation state that they should be replaced with similar materials.

In response to the finding of “no adverse effect”, the National Society for the Preservation of Covered Bridges strongly disagrees with that assessment. On the contrary, we feel that there is certainly an adverse effect here.

In table 4-2, where the criteria for adverse effect are discussed, the evaluation on line “iv” states that *“the proposed project will not change the character of the property’s use. It will not change the character of the physical features within the bridge’s setting that contributes to its historic significance, as the bridge is not significant for its setting, but for its engineering and design.”* First of all, the bridge is certainly significant for its setting as a component of the overall historic Dreibelbis Station area. Since the report states that the bridge is historically significant for its engineering and design and the work being proposed here replaces much of the historic materials integral to that engineering design, how can one state that there is no adverse effect?

The stone abutments are historic components of the structure. The proposal indicates a desire to replace them with new concrete abutments. The timbers which make up the floor system work with the timbers of the wall trusses to support the structure and the loads it carries. How can one propose to replace the floor system with material that is not representative of the time period of the structure plus change the function of the remaining historic material and claim that there is no adverse effect on the property?

The *Secretary of the Interior’s Standards for Rehabilitation* were originally drafted with reference to buildings, although they were intended to apply to all types of historic structures. The National Park Service has been working since 2004 to develop written guidelines that illustrate how the *Standards* may be applied to historic covered bridges. The forthcoming National Park Service document *Guidelines for Rehabilitating Historic Covered Bridges* is in its final editing stages and will be issued to the public soon. The *Guidelines* address specific issues that relate to the proposed treatment of the Dreibelbis Station Covered Bridge. The National Society for the Preservation of Covered Bridges respectfully suggests that the following excerpts from the *Guidelines* confirm that the proposed treatment of the bridge does not conform to the *Secretary of the Interior’s Standards for Rehabilitation*:

For floor systems, the following is

Recommended:

Identifying, retaining, and preserving the floor structure system and individual features of that system important in defining the overall character of the historic covered bridge, such as the floor beams, stringers, and deck planks.

and

Correcting structural deficiencies or making code-required alterations in a manner that preserves the structural system and individual character-defining features.

Not Recommended:

Upgrading the bridge structurally in a manner that diminishes the historic character of the floor system, such as replacing floor joists with non-wood materials such as steel beams.

and

Radically changing or damaging floor system features that are character defining while trying to correct structural load-carrying deficiencies, such as installing a new floor system which incorporates steel or engineered lumber.

For substructures (Abutments and Piers), the following is

Recommended:

Repairing masonry by repointing the mortar joints where there is evidence of deterioration, such as disintegrating mortar, cracks in mortar joints, loose stone, and damp walls.

and

Repairing masonry features by patching, piecing in, or consolidating the masonry using recognized preservation methods.

Not Recommended:

Removing or radically changing substructure features. Replacing or rebuilding major portions of exterior masonry abutments or wing walls that could be repaired, resulting in essentially new construction.

and

Using substitute material for the replacement component that does not convey the visual appearance of the surviving parts of the masonry feature or that is physically or chemically incompatible.”

On behalf of the National Society for the Preservation of Covered Bridges, thank you for the opportunity to participate in the Section 106 review process. We look forward to continued involvement with this project and future Pennsylvania covered bridge projects.

Sincerely,



NSPCB President

cc: James M. Vaughan, State Historic Preservation Officer
Berks County Commissioners
Karl Olson, NSPCB Vice President
Timothy Andrews, Carmela Sciandra, Scott Wagner, NSPCB Directors
Joye Olson, Recording Secretary
Bob Watts, Corresponding Secretary