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August 18, 1982

Testimony of the Bucks County Conservancy presented by Kathryn Ann Auerbach, Director, Historical Sites Survey before the Nuclear Regulatory Commission Staff at the public hearing held at the Holiday Inn in Pottstown, PA.

RE: The Proposed Pumping Station at Point Pleasant, Bucks County along the Delaware River to supply water to the Limerick Nuclear Power Generating Plant.

The Bucks County Conservancy wishes to make the following statement regarding the impacts of the proposed pumping station on the Delaware River at Point Pleasant, Plumstead and Tinicum Townships, Bucks County, Pennsylvania on the archaeological and historical resources defined and recognized at that site. Our primary concern is regard to two federal laws: Section 106 of the National Historic Preservation Act of 1966 and Section 110F of the Historic Preservation Act Amendments of 1980. There are several historical resources which fall under the protection of these laws within the impact area, namely, the Archaeological District of Point Pleasant and the Historical District of Point Pleasant, both deemed eligible for the National Register and the Delaware Division of the Pennsylvania Canal, a National Historic Landmark.

The Conservancy has made public testimony with regards to these resources to the Delaware River Basin Commission and the United States Department of the Army Corps of Engineers, Philadelphia Branch and has submitted extensive documentation to the Pennsylvania Historical and Museum Commission, the National Register, the Army Corps of Engineers and the President's Advisory Council on Historic Preservation. We understand the NRC has accepted these previous testimonies as part of their public record of the Conservancy's comments.

There are several new points of emphasis the Conservancy wishes to make tonight. Firstly, the Conservancy feels that review procedures by other agencies regarding the Delaware Canal have not complied with the provisions of Section 110F of the above cited law. This section states that the "head of the responsible Federal agency shall, to the maximum extent possible, undertake such planning and actions as may be necessary to minimize harm to such landmark, and shall afford the Advisory Council a reasonable opportunity to comment on the undertaking." The crossing of the Canal at the proposed location will cause considerable damage and disruption to the Canal and its environment, specifically, blasting through extremely hard rock 30' below the Canal will destroy that section of the Canal and endangering two original locks flanking the site and possibly the aqueduct over the Tohickon Creek. Blasting studies to date have been questioned as to their adequacy in assessing the impact of the blasting according to the present designs of the project.

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The Mountainside Inn, a hotel dating to the mid-18th century is included in the Canal's Landmark designation and within direct visual environment of the proposed project. The immediate vicinity around the Canal and the hotel is primarily a natural one and the inclusion diminishes the value of the visual quality created by these resources. The Advisory Council recognizes the implications of Section 110F and is presently including them in its Memorandum of Agreement being drafted with the Army Corps. The Conservancy recommends to the NRC that alternatives to the proposed project for supplying water to Limerick be actively investigated in accordance with Section 110F to assure the protection of the Canal. The ultimate value of the Canal, a national resource, can only be retained if it is maintained as much as possible in its existing state, not destroyed and rebuilt as a facsimilie.

Secondly, through the efforts of the Conservancy, a definitive study is being conducted uncovering new information regarding the archaeological resources within the district of Point Pleasant which is leading to increased understanding and significance of the site. The archaeological district, which follows essentially the same boundaries as the historic district as defined by the Conservancy, is significant for the following reasons. 1. To date there has been no detailed archaeological investigations of the Indian occupation in the Middle Delaware Valley, especially on the Pennsylvania side; this site, therefore, can yield new and significant information regarding Pennsylvania prehistory. 2. Within the boundaries are several types of features, adjacent or a part of each other and all interrelated: village occupation sites, lithic workshops, graves and most importantly, argillite quarries. The latter is generally found as an isolated feature, not adjacent to village occupation areas, thereby making the Point Pleasant example very unusual and significant. 3. A number of the floodplain sites are stratified, one recently tested has revealed a nearly perfect stratification with the Late Woodland (or most recent) occupation beginning 20" below the surface. Sites in this region range from the time of European contact as far back as 4,000BC. 4. Within this district many of the features are basically intact and are resources that can be carefully tapped for important information.

Mr. Samuel Landis, of Bryn Mawr College and formerly Regional Archaeologist for the PHMC is of the strong opinion that the Point Pleasant Archaeological District may qualify as a National Historic Landmark in its own right. The proposed intake pipes would cut directly through a significant section of one of the village occupation sites thereby destroying valuable data necessary to the integration of all

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the sites and the interpretation of Delaware River occupation as a whole. Salvage archaeology is an undesirable method of retrieving data. All efforts should be taken to insure that all the sites within this district be preserved in order that proper study can be conducted with great care.

Thirdly, the unique qualities of the Historic District of Point Pleasant will be marred with the intrusion of a facility with a use incompatible with its surroundings. Point Pleasant is characterized by its strong natural features and casual residential and light commercial activities with strong ties to the river through fishing, recreation and simply the climate and atmosphere created by the flowing water. Point Pleasant encapsulizes a river civilization which has existed over six millenia, latter occupations gracefully overlaying former with a continual recognition of the river as a source of subsistence and pleasure to its inhabitants.

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