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February 7, 2022

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**RE: Milanville-Skinners Falls Bridge (Bridge #5)  
Project PA SHPO Project No. 2013-8011-127 PennDOT District 4-0**

Dear PennDOT Employees and Representatives:

We are providing these **previous letters from DCS and those from other entities** again because the draft purpose and need statement fails to reflect the input provided in these materials and PennDOT has failed to explain anywhere why it is ignoring the weight of the letters and the comments. There have been additional new letters submitted that PennDOT must answer as well.

Further:

- PennDOT's letter of 1-20-2022 provides no comfort to DCS that PennDOT intends to explicate its reasoning for rejecting the overwhelming concerns of commenters, such as the importance of historic preservation, which was emphasized by commenters ranging from the National Park Service and UDC to local residents.
- A true comment/response document is not a "summary" of comments received – it explains to the public why PennDOT has or has not accepted the issues presented in the comments and letters, and why PennDOT has chosen to draft the Purpose and Need statement a certain way.
- As it presently stands, the draft Purpose and Need statement is being shaped from the get-go to predetermine an outcome of bridge replacement given what PennDOT has included in the draft, and what it has ignored.
- DCS lawyer, Lauren Williams adds, "The draft Purpose and Need Statement and PennDOT's actions are contrary to the weight of the comments, the requirements of the law (**see our previous letters and those from other entities**), and the key role this bridge plays in the local and regional setting, as well as its national historic significance."

These letters, in addition to other comments provided to PennDOT, express with clarity the deep desire of the community and the view of experts that the bridge is repairable and restorable, and with proper maintenance, can be a part of the community for many more decades. That they have been completely ignored is infuriating - and so wrong.

Sincerely yours,



Barbara Arrindell, Director  
Damascus Citizens for Sustainability

# Greenworks

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June 1, 2021

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**RE: Milanville-Skinners Falls Bridge (Bridge #5) Project  
PA SHPO Project No. 2013-8011-127  
PennDOT District 4-0**

Dear PennDOT Employees and Representatives:

We represent Damascus Citizens for Sustainability (“DCS”), a Section 106 consulting party, regarding PennDOT’s proposed work on the Milanville-Skinners Falls Bridge (“Bridge”). DCS is deeply opposed to any PennDOT proposal to destroy the historic landmark bridge to replace it with a new bridge with a weight limit and lane capacity not shown to be needed in the area, whose historic and landmark beauty it would disrupt and degrade. Likewise, DCS has serious concerns about the present process that PennDOT is using to collect information in its “Planning and Environmental Linkages (PEL) Study,” a “study” that appears to be aimed at shaping the process to get to a predetermined endpoint of Bridge destruction and replacement, rather than analyzing required environmental, historical, scenic, ecological, and heritage aspects in necessary alternatives analyses and decision-making processes. A proper analysis of all the aforementioned factors, combined with public sentiment, overwhelmingly points to Bridge restoration and rehabilitation and the maintenance of the Bridge’s important linkages to the region’s history and environment.

I. Public Exclusion From and/or Limitation of the PEL Study Process

PennDOT appears to have heavily relied thus far on the input of only part of the Project Advisory Committee (“PAC”). The PAC comprises only a small group of public officials in addition to the Upper Delaware Council (“UDC”) and the National Park Service. The public itself has no direct say at the PAC. To DCS’s knowledge, the public



officials on the PAC have largely failed to consult with their constituents, if any consultation occurred at all. From DCS's perspective, local public officials from Pennsylvania have largely expressed their own preferences for the Bridge's future, which are directly opposed to the public's overwhelming support for Bridge restoration and rehabilitation.

As for UDC's input, PennDOT failed to account for the fact that the UDC Executive Director cannot provide input to PennDOT on behalf of UDC without having first consulted all UDC member municipalities. Thus, at the PAC's initial February 2021 meeting, UDC was unable to provide PennDOT with its position. Notably, once UDC met to discuss the Bridge, UDC member municipalities voted overwhelmingly in favor of restoring and rehabilitating the bridge. Likewise, at the time of the PAC's meeting in February, the National Park Service was not in a position to provide any update to its prior position in opposition to Bridge destruction. Now that the present Superintendent for the Upper Delaware, Joseph Salvatore, has had time to review the matter, he has, like UDC, expressed the National Park Service's strong opposition to destruction of the Bridge and its support for Bridge restoration.

Despite this, PennDOT's online presentation claims that the PAC supports allowing all types of traffic to cross at Milanville and Skinners Falls, which would necessitate destruction of the Bridge. However, PennDOT appears to be listening to only a handful of officials. Thus, in addition to the public being directly excluded from the PAC, PennDOT appears to be sidelining those PAC members whose opinions align with the public's opposition to eliminating yet another historic bridge in the Upper Delaware.

Also, as you may be aware, PennDOT is using a third-party platform (SurveyMonkey) to conduct what is essentially a traffic survey with limited ability for the public to provide input on anything else. This attempts to constrain the public to give PennDOT only the information it wants, not the information PennDOT needs to comply with its obligations under, *inter alia*, Section 106 of the National Historic Preservation Act, the Wild and Scenic Rivers Act, the Delaware River Basin Compact and the Commission's regulations, the Upper Delaware Scenic and Recreational River Management Plan, and Pennsylvania's Environmental Rights Amendment. The National Park Service strongly cautioned PennDOT in 2019 as to the various processes PennDOT must comply with in regard to the Bridge, and the UDC likewise reiterated many of these same requirements in an April 2021 letter. The current National Park Service's Upper Delaware Superintendent, Joe Salvatore, also spoke to PennDOT's obligations in his May 31, 2021 letter. However, almost none of the information in the PEL Study speaks to any of the aforementioned requirements or obligations stated in the National Park Service's and UDC's letters.



In addition, the traffic survey refers to PennDOT’s presentation on the PEL study; however, that presentation failed to provide any studies or other resources that support PennDOT’s claims, for instance, that a different type of bridge would boost tourism in the area. Thus, the public cannot comment in an informed fashion because PennDOT appears to be withholding or otherwise not providing key information. Further, there does not appear to be any guarantee that PennDOT plans to issue a comment-response document or other response to comments as would typically occur in, for example, many permitting situations before the Pennsylvania Department of Environmental Protection. Lastly, it is not even clear how PennDOT is retaining responses collected via the third-party platform for inclusion in the administrative record. Typically all comments submitted are retained for inclusion in the administrative record and may be relied upon by any party in litigation over the project. However, PennDOT’s “survey” setup significantly concerns DCS that PennDOT would not be retaining or responding to comments collected through SurveyMonkey.

The public deserves actual opportunities for input, including through traditional public comment procedures. PennDOT’s apparent attempts to narrow the scope of its inquiries in later studies (including under the National Environmental Policy Act) by avoiding proper public involvement are arbitrary, inexcusable, and unacceptable.

## II. The Milanville-Skinners Falls Bridge Must be Rehabilitated and Preserved

DCS is strongly opposed to any plan to destroy yet another historic bridge along the Upper Delaware River corridor, and in particular, the consideration of any plan to eliminate the existing, National Register-listed Milanville-Skinners Falls Bridge. The Bridge is an integral part of the Milanville Historic District, which is also National Register listed. Indeed, the District’s boundaries in the nomination documents were drawn to specifically include the bridge, as it is a key “anchor” structure for the District. If PennDOT removes the bridge, such an action will rip a massive hole in the heart of the District and significantly destroy and impair the historic nature of what would remain of the District.

PennDOT’s plan to change the originally one-lane, 9-ton bridge to a *two*-lane bridge capable of carrying 35-40 ton vehicles would necessitate changes to the bridge approaches, including changes that would compound the negative impacts on the Historic District of eliminating the existing bridge. And for what reason? PennDOT has failed to provide any data or studies showing that the kind of bridge it proposes is even needed.

To DCS’s present knowledge, fire or rescue companies on either side of the River have smaller “rescue” trucks that could easily use a restored bridge. This is consistent



not just with Bridge's requirements, but also the weight limits on, and narrow and winding nature of, River Road and other roads connecting to the Bridge. As for access for larger fire and rescue vehicles, hospitals and local fire houses are strategically located closer to the bridges at Cochection and Narrowsburg, both which can carry larger emergency vehicle traffic in addition to heavy truck traffic. Both the Cochection and Narrowsburg bridges are also more directly connected to roads capable of handling heavy truck traffic, including NY Route 97, and PA Routes 371 and 652.

From its inception, the Milanville-Skinners Falls Bridge was never intended to carry heavy truck traffic and PennDOT has failed to show any reason why this must be changed. Installing a two-lane, 35-40 ton capacity bridge is simply a waste of taxpayer money at the significant expense of important history. Indeed, for all of PennDOT's unsupported claims regarding tourism and a new bridge, it has ignored that tourism would be *harmed* by destroying the present Bridge. Tourists that flock to the local area around Milanville and Skinners Falls specifically come for its historic, scenic, and natural environment and amenities and recreational opportunities on the River. The Bridge is a key part of this draw given how it "fits perfectly into its rural setting" and forms a key part of the Upper Delaware Scenic and Recreational River's Wild and Scenic designation.<sup>1</sup> Heavy truck and vehicle traffic into this area would add more pollution and directly degrade the very historic, natural, and scenic qualities that draw tourists to enjoy the towns, to recreate on the River, and to enjoy time away from the rushed nature of life in more crowded areas. Destruction of the Bridge specifically and only for the purpose of allowing heavier vehicular traffic would further eliminate the very reasons for why people come to enjoy the area.

The Bridge has always been one-lane since it was opened, and built to a capacity of 9 tons. It is only due to PennDOT's failure to properly maintain the bridge that the bridge has deteriorated. A failure to keep up maintenance, and much less proper maintenance on a historic bridge, is no basis to say that structure of national historical significance should simply be done away with. The UDC specifically cited to a 2014 PennDOT study that recommended the 119-year old bridge's "full rehabilitation."<sup>2</sup> As of 2019, PennDOT's own inspection records show that restoration and rehabilitation of the Bridge was still in play. Bach Ornamental and Structural Steel Inc. – which PennDOT District 4-0 has worked with in the past – has written to PennDOT in strong support of the Bridge, and emphasized: "This bridge is an extremely rare example of a

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<sup>1</sup> April 22, 2021 Letter from Upper Delaware Council to Susan Williams (PennDOT), p.1. Further, the Bridge is important to those who live and work in the area on a daily basis. As noted by UDC, "[t]he activities associated with the bridge's use meld with our countryside daily living and recreational pursuits that are disrupted by its closure, such as people crossing it for work, shopping day care, church, scenic drives, and visits" to important historical landmarks and natural places. *Id.* at p.2. The UDC letter further describes the public's overwhelming support for saving the Bridge and restoring it to its original glory.

<sup>2</sup> *Id.* at pp.1-2.



multi-span pin-connected Baltimore truss bridge. It is among the oldest known bridges associated with the American Bridge Company, having been built shortly after the company's formation."<sup>3</sup> The company also wrote that it "would be feasible and cost effective to restore" the Bridge, and that a "fully comprehensive restoration performed by engineers and contractors with extensive experience doing this type of work" would help keep future maintenance costs to a minimum.<sup>4</sup>

Any elimination of the Bridge raises significant environmental concerns as well. It is presently unclear if such a course of action would involve destruction of the Bridge in its entirety (including bridge abutments and piers), or simply the bridge's superstructure and decking. The Bridge is located in the Delaware River Basin Commission's "Outstanding Resource Waters" Special Protection Waters designation area, which is the highest level of protection available to a waterway under the Commission's standards. Pennsylvania records also show the presence of at least one freshwater mussel species of special concern in the area. Any work must also undergo Commission Section 3.8 project review given that the Bridge is located in a recreation project area designation in the Comprehensive Plan (i.e. the Upper Delaware Scenic and Recreational River). 18 C.F.R. § 401.35(a)(10). DCS is deeply concerned about the degree of disturbance to the River, its water quality, its aquatic life, and river recreation that bridge replacement would entail. When PennDOT replaced the Pond Eddy Bridge, it created a causeway that blocked approximately half the River at a time before switching sides to finish the rest of the work. In addition to harming recreation, the causeway also resulted in sedimentation and flooding. This kind of disruption is a blight on River recreation, which is a major component of tourism and economic activity in the local area. It would also disrupt public access to the River, which is available on the New York side of the Bridge. Causeway creation at Milanville-Skinners Falls could also result in changes to the rapids just downstream of the bridge, causing alterations to river flow that would exacerbate or increase flooding and thus damage properties along the River, including historic ones.

DCS wants to ensure that the destruction that happened to the historic Pond Eddy Bridge does not occur again. After an over twenty-year fight, the river community lost that bridge to PennDOT's replacement bridge, which bears little resemblance to the graceful, historic structure that had stood in its place for decades. The Milanville Bridge is an integral part of the town of Milanville and its historic district. Destruction of the Bridge will forever alter the town, degrade its historic nature, and eliminate the "natural, scenic, historic and esthetic values" that the Bridge contributes to the local environment. Pa. Const., art. I, § 27. As a Pennsylvania agency, PennDOT has a constitutional obligation to "preserv[e]" those values. *Id.* Destruction of the Bridge would directly violate those duties, and would be even more egregious in

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<sup>3</sup> May 5, 2021 Letter, p.1.

<sup>4</sup> *Id.*



light of the present lack of any demonstrable need for bridge replacement, and the opinion of bridge restoration experts that the Bridge is fully restorable.

We strongly encourage PennDOT to focus on restoration and rehabilitation of the Bridge so it may last for generations to come and to eliminate from consideration any project that entails destruction of the Bridge in any capacity.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Lauren M. Williams'.

Lauren M. Williams, Esq.  
For Greenworks Law and Consulting  
LLC

Enclosures

July 26, 2019 Letter from National Park Service Letter (NPS Northeast Region)

April 22, 2021 Letter from UDC

April 26, 2021 Letter from Upper Delaware Scenic Byway

May 5, 2021 Letter from Bach Ornamental and Structural Steel

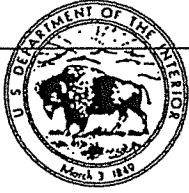
May 31, 2021 Letter from National Park Service (NPS Upper Delaware Scenic and Recreational River)

cc: Laurie Ramie, UDC Executive Director, [laurie@upperdelawarecouncil.org](mailto:laurie@upperdelawarecouncil.org)

Emma Diehl, Above Ground Resources Environmental Review Specialist,  
Pennsylvania Historical and Museum Commission  
State Historic Preservation Office, Eastern Region, [emdiehl@pa.gov](mailto:emdiehl@pa.gov)

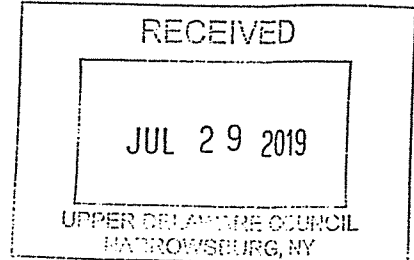
Joseph Salvatore, National Park Service - Upper Delaware Scenic and  
Recreational River, [joseph\\_salvatore@nps.gov](mailto:joseph_salvatore@nps.gov)

Barbara Arrindell, DCS Director, [Director@DamascusCitizens.org](mailto:Director@DamascusCitizens.org)



## United States Department of the Interior

NATIONAL PARK SERVICE  
Northeast Region  
United States Custom House  
200 Chestnut Street  
Philadelphia, PA 19106-2878



IN REPLY REFER TO:

July 26, 2019

I.A.2 (UPDE-SO)  
2019-14

Ms. Susan Williams  
Senior Civil Engineer Supervisor Transportation  
PA Department of Transportation, Liaison Unit - Engineering District 4-0  
55 Keystone Industrial Park  
Dunmore, PA 18512

**Re: PENNDOT D4 Skinners Falls Project – Interstate Bridge #5**

Dear Ms. Williams:

Thank you for sending the meeting minutes from the June 18, 2019, field meeting for the Skinners Falls-Milanville Bridge, received on July 15, 2019. The purpose of this letter is to explain the National Park Service's review authority and to continue the necessary coordination with your Department.

Interstate Bridge #5 between Cochection, NY and Milanville, PA is located on the Upper Delaware Scenic and Recreational River. In 1978, Congress designated Upper Delaware Scenic and Recreational River as both a unit of the National Park System (NPS) and a unit of the National Wild and Scenic Rivers System (Upper Delaware Act, Public Law 95-625 § 704, November 10, 1978). As a result, Upper Delaware Scenic and Recreational River is subject both to NPS management policies and to any other requirements specified in the National Wild and Scenic Rivers Act (P.L. 90-542).

The primary statutory directive for the National Park Service is provided by the NPS Organic Act of 1916 which established the purpose of the NPS "to conserve the scenery and the natural and historic objects and the wild life therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations" [The Organic Act of 1916, 16 U.S.C. § 1, (1916)]. The NPS interprets the Organic Act through the development of National Park Service Management Policies (NPS 2006) and the courts have stated that "the Park Service has broad discretion in determining which avenues best achieve the Organic Act's mandate" (*Bicycle Trails Council of Marin v. Babbitt*, 1996). In line with this broad discretion, the Organic Act provides the Park Service with the authority to make such regulations as it deems "necessary or proper for the use and management of the parks" (16 U.S.C. § 3).



Similar to the mandate of the Organic Act, the National Wild and Scenic Rivers Act of 1968 (WSRA) states that "certain selected rivers of the Nation which, with their immediate environments, possess outstandingly remarkable scenic, recreational, geologic, fish and wildlife, historic, cultural, or other similar values, shall be preserved in free-flowing condition, and that they and their immediate environments shall be protected for the benefit and enjoyment of present and future generations" [The National Wild and Scenic Rivers Act of 1968, 16 U.S.C. §§ 1271-1287, (1968)].

#### Section 7(a)

Review of this project may be required under Section 7(a) of the WSRA. The WSRA requires evaluation of the impacts of "water resources projects"<sup>1</sup> within the river's bed or banks. The authority for this evaluation is found in Section 7(a) of the Act. The determination of a proposed federally assisted water resources project's potential impacts on a river's outstandingly remarkable values, water quality, and free-flowing condition is made solely by the NPS. Through the language of this section, Congress expressed the clear intent to protect river values from the harmful effects of water resources projects. The following "outstandingly remarkable resource values" associated with the Upper Delaware Scenic and Recreational River exists in the immediate area of the proposed project: Recreational, Scenic, Cultural, Geological, and Ecological. Like all National Wild and Scenic Rivers, the Upper Delaware also possesses a free-flowing condition and exceptional water quality. The proposed repair of Bridge # 5's New York side wing wall and abutment could potentially result in impacts to fish, mussels and other wildlife; to river flows and water quality; and to geological, recreational and scenic resources.

The Act prohibits Federal agencies from assisting in the construction of any water resources project that would have a direct and adverse effect on the values of a designated river [Section 7(b)]. 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." Federal actions, including the issuance of a Section 404 permit by the Army Corps of Engineers, may not proceed unless the NPS has determined in writing that the proposed project fully meets the requirements of the WSRA:

In addition to Congressional acts dealing specifically with the National Park System and to National Wild and Scenic Rivers, many other statutes impose requirements that may affect decisions made by the National Park Service with regard to managing a National Wild and Scenic River. These statutes include the Antiquities Act (16 U.S.C. § 431), the National Environmental Policy Act (NEPA) (42 U.S.C. §§ 4321-4347), and the National Historic Preservation Act of 1966 (NHPA) (16 U.S.C. § 470 et seq.).

Based on our preliminary understanding of the project, the following additional reviews and permits may also be required:

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<sup>1</sup> A "water resources project" under section 7 of the WSRA is defined as any dam, water conduit, reservoir, powerhouse, transmission line, or other project works under the Federal Power Act (FPA), or other construction of developments which would affect the free-flowing characteristics of a wild and scenic or congressionally authorized study river (36 CFR 297.3). In addition to projects licensed by the Federal Energy Regulatory Commission (FERC), water resources projects include, but are not limited to: dams; reservoirs; water diversion projects; fisheries habitat and watershed restoration/enhancement projects; bridges and other roadway construction/reconstruction projects; bank stabilization projects; channelization projects; levee construction; recreation facilities such as boat ramps and fishing piers; and activities that require a permit from the U.S. Army Corps of Engineers pursuant to section 404 of the Clean Water Act (33 USC 1344).

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#### Section 4(f)

Section 4(f) of the Department of Transportation Act of 1966 protects publicly owned parks, recreation areas, and wildlife or waterfowl refuges of national, state, or local significance and historic sites of national, state, or local significance from use by transportation projects. Publicly owned waters of designated Wild and Scenic Rivers are protected by Section 4(f). Depending on the Section 4(f) pathway taken by the project, a determination regarding the project's Section 4(f) status could potentially require written concurrence by the National Park Service, or the park may be required to provide Section 4(f) comments.

#### State Historic Preservation Office Consultation

The bridge was added to the National Register of Historic Places in 1988 through a National Register Nomination for Highway Bridges Owned by the Commonwealth of Pennsylvania Department of Transportation; is highlighted as a rare steel truss bridge in the 1992 Multiple Property Listing of Historic and Architectural Resources of the Upper Delaware Valley; and was listed as a Contributing Resource in the Milanville Historic District National Register of Historic Places Registration Form approved in 1993.

Since the bridge is located in both Pennsylvania and New York, consultation with both the New York and Pennsylvania SHPOs is required prior to the initiation of Phase 1 of the repairs. Documentation of your consultations and the findings of both SHPOs will be required.

#### Special Use Permit

Two special use permits will be required from the National Park Service – one for each phase of the project. The park will need to provide management and oversight on this project to avoid impairment or incompatible use of the resources and values of the park, limit resource damage, minimize health and safety risks to the visiting public, prevent disruption of visitor use or conflicts, and protect agency resources. PennDOT will therefore be required to obtain a Special Use Permit from the park for construction to proceed. The National Park Service at the Upper Delaware Scenic and Recreational River allows construction when it is consistent with the protection and public enjoyment of park resources, and avoids conflict with the public's normal use and enjoyment of the park. Any special conditions and restrictions will be noted on the Special Use Permit. For this project, the permittee must have an approved Boater Safety Plan/Aids to Navigation (ATON) Plan in place prior to the commencement of construction as a condition of the permit.

#### Boater Safety Plan/Aids to Navigation Plan (ATON)

A Boater Safety Plan/ATON must be approved by the National Park Service prior to beginning work on the project, and will be considered part of the Special Use Permit issued by the NPS. To obtain NPS approval, the Boater Safety Plan/ATON must meet the guidelines established in the Upper Delaware Scenic & Recreational River "Boater Safety Plan/ATON Requirements".

#### Consistency with the River Management Plan and Land and Water Use Guidelines

In addition to the above considerations, decisions made by federal and state agencies must be consistent with the Land and Water Use Guidelines contained in the 1986 Final River Management Plan for the Upper Delaware Scenic and Recreational River. Projects involving facilities in the river corridor to be constructed or operated by governmental agencies, such as Interstate Bridge #5, are reviewed as Class II projects for substantial conformance with the Land and Water Use Guidelines. Damascus Township and the Town of Cochecton are members of the Upper Delaware Council (UDC), the organization responsible for performing reviews of Class II projects within the UDC's

member communities and making recommendations to the National Park Service. It will be necessary, therefore, to submit the design plans to the Upper Delaware Council for a substantial conformance review. Pete Golod, Resource Specialist at the Upper Delaware Council, can provide more information about plan submission requirements and the UDC's project review process. He can be reached by phone at (845) 252-3022 and by email at [Pete@upperdelawarecouncil.org](mailto:Pete@upperdelawarecouncil.org).

Thank you for providing the meeting minutes to the National Park Service. In order to fully understand the park's review responsibilities with regard to the proposed bridge project, please send detailed construction drawings and specifications when they have been completed. Please also advise whether federal money is being used to fund any aspect of the project and what other federal permits are anticipated.

If you have any questions, please call Jennifer Claster, Community & Land Use Planner, at (570) 729-7136 ext. 2230 or email [jennifer\\_claster@nps.gov](mailto:jennifer_claster@nps.gov).

Sincerely,



Marilou Ehrler  
Acting Superintendent

cc: Laurie Ramie, Executive Director, Upper Delaware Council  
Emma Diehl, Historic Building Project Reviewer, Pennsylvania State Historic Preservation Office  
Weston Davey, Technical Assistance and Compliance, New York State Division for Historic Preservation



# Upper Delaware Council

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[www.upperdelawarecouncil.org](http://www.upperdelawarecouncil.org)

April 22, 2021

Susan Williams, Project Manager, Senior Civil Engineer Supervisor Transportation  
Pennsylvania Department of Transportation  
Engineering District 4-0 Liaison Unit  
55 Keystone Industrial Park  
Dunmore, PA 18512-1516

**RE: Skinners Falls, NY-Milanville, PA Bridge PEL Comments due by April 30, 2021**

Dear Ms. Williams,

The Upper Delaware Council, Inc. (UDC), whose 13 towns and townships, the Commonwealth of Pennsylvania, and the State of New York as voting members work in partnership with the National Park Service to conserve the 1978 federally-designated Upper Delaware Scenic and Recreational River, offers these comments in response to the Planning and Environmental Linkages (PEL) Study underway for the Skinners Falls, NY-Milanville, PA Bridge.

- 1) The UDC has consistently supported preserving Interstate Bridge #5 by maintaining the crossing that has existed for 119 years and rehabilitating it to the original nine-ton weight limit or highest posting that can be practically achieved without compromising the historic elements that give the bridge its unique character.
- 2) The 466.9-foot-long, two-span structure with a 13-foot-wide timber deck, built in 1902 by the American Bridge Co., fits perfectly into its rural setting, helps define the Upper Delaware Scenic and Recreational River's Outstandingly Remarkable Values in the cultural category, and serves as a treasured, picturesque attraction for this special region's nearly 250,000 annual visitors and our local residents alike.
- 3) The pin-connected Baltimore through truss design is historically and technologically significant, earning a November 14, 1988 designation to the National Register of Historic Places as one of only three such truss types among 135 highway bridges owned by PennDOT that had not been demolished as of 2019. The bridge is also featured on the "Historic and Architectural Resources of the Upper Delaware River Valley: New York and Pennsylvania" 1992 Multiple Property National Register listing for its rare truss style along with the original 1904 Pond Eddy Bridge, before that structure was torn down following a 20-year controversial debate and replaced with a two-lane, concrete bridge in 2018. In 1993, the Milanville Historic District was added to the Register in recognition of the area's 19<sup>th</sup> and early 20<sup>th</sup> century industrial development and noteworthy architecture which prominently includes the bridge among its 14 contributing structures.
- 4) A 2014 PennDOT feasibility study considering the same current alternatives for the Skinners Falls-Milanville Bridge recommended its full rehabilitation to a 10-ton weight

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***Working together to conserve the Upper Delaware Scenic and Recreational River***

*Town of Hancock - Town of Fremont - Town of Delaware - Town of Cochecton - Town of Tusten - Town of Highland  
Town of Lumberland - Town of Deerpark - Damascus Township - Berlin Township - Lackawaxen Township - Shohola Township - Westfall Township  
State of New York - Commonwealth of Pennsylvania - Delaware River Basin Commission - In partnership with the National Park Service*

limit. A precedent for the NY-PA Joint Interstate Bridge Commission supporting the preservation of a single-lane Upper Delaware River crossing is found upstream at the Kellams, NY-Stalker, PA Bridge, originally built in 1890 with major rehabilitations occurring in 1990 and 2018. The 384-foot suspension bridge serves a similar traffic count of approximately 300 vehicles per day, is suitable for its rural location, and carries an 11-ton limit.

- 5) A 9 or 10-ton posted Skinners Falls Bridge would adequately fulfill the transportation needs of its communities in the Town of Cochecton, NY and Damascus Township, PA. Standard cars (1.5 tons), personal trucks (3 tons), ambulances (5-7 tons), and delivery trucks (6-8 tons) could all be accommodated. The types of vehicles that could not - such as buses, fire trucks, and tractor trailers - are not appropriate or necessary given that there are alternative crossings offered at short distances away in Narrowsburg and Cochecton via NYS Route 97, most firefighters here respond directly to emergency scenes in their personal vehicles, and there is no major commercial industry to travel to on either side.
- 6) Installing a two-lane, 40-ton modern bridge would require negotiations to acquire additional property or taking of land by eminent domain. Even so, the new bridge would lead to River Road in Milanville which is weight posted for 10 tons, characterized by narrow, twisty lanes, has been subjected to slope failures, and the approach lacks a proper turning radius for larger vehicles. Those conditions render the intent nonsensical. The required upgrade of the connecting road would add an astronomical cost to the project.
- 7) The activities associated with the bridge's use meld with our countryside daily living and recreational pursuits that are disrupted by its closure, such as people crossing it for work, shopping, day care, church, scenic drives, and visits to the circa 1850 Milanville General Store, the National Park Service Milanville Ranger Office, the NYS DEC Skinners Falls River Access, Lander's River Trips Skinners Falls Campground, and Lou's Tubes. Numerous petition drives and the March 30 virtual public meeting attended by an impressive turnout of nearly 150 spoke to the importance of this bridge in their lives and the adverse impacts of its closure, most recently ongoing since October 16, 2019.
- 8) Given that PennDOT has estimated a two-year timeframe to secure environmental and permitting clearances before any construction could occur at this site, the UDC requests consideration of improving the aesthetic appearance of the barricades to traffic and pedestrians. Those currently consist of large dirt piles that create mud, orange barrels, and a proliferation of standard metal signs. We propose installing temporary wooden gates and more attractive signage to relay those messages within this designated national park unit vicinity, with the goal of reducing the visual blight of this bridge that is beloved by photographers, artists, boaters passing under it, and people viewing it from either side.

Please note that the Final 1986 *River Management Plan for the Upper Delaware Scenic and Recreational River: New York and Pennsylvania* stipulates that facilities in the river corridor to be constructed or operated by government agencies must be reviewed by the UDC as Class II development projects for their substantial conformance with the Land and Water Use Guidelines under the terms of our Cooperative Agreement with the National Park Service. The UDC also seeks to participate as a consulting party for the required Section 106 review under the National Historic Preservation Act. Additionally, the National Park Service will evaluate the project's impacts under Section 7 of the National Wild and Scenic Rivers Act.

In conclusion, while we recognize the need to invest dollars wisely for construction and long-term maintenance expenses, the UDC believes that tearing down the iconic Skinners Falls-Milanville Bridge in favor of replacing it with an unremarkable and unnecessary modern bridge would create new and potentially more consequential problems, while permanently destroying the historical and cultural value it offers to the Upper Delaware River Valley.

We urge working with the engaged community of bridge rehabilitation proponents to seek public and private historic preservation funding sources as needed to supplement the FHWA aid. The Skinners Falls-Milanville Bridge is worth saving.

Sincerely,



Jeffrey R. Dexter,  
UDC Chairperson

Cc: Neil Shemo, AECOM Project Manager  
Marian Hull, AECOM Public Involvement  
Richard Roman, PennDOT Transportation District 4 Executive  
Nicolas Choubah, NYS DOT Region 9 Regional Director  
Susan Hazelton, PennDOT Assistant District Executive for Design  
Christine Klein, NYS DOT Regional Planning Office Local Programs Liaison  
Joe Canfield, Steve Adams, Dan Rutledge, Damascus Township Board of Supervisors  
Gary Maas, Town of Cochection Supervisor  
Brian Smith, Wayne County Commissioners Chairman  
Robert Doherty, Sullivan County Legislature Chairman, District 1  
Craig Rickard, Wayne County Planning Department Director  
Freda Eisenberg, Sullivan County Commissioner of Planning and Community Development  
PA Senator Lisa Baker, 20<sup>th</sup> District  
NYS Senator Mike Martucci, 42<sup>nd</sup> District  
PA Representative Mike Peifer, 139<sup>th</sup> District  
NYS Assemblywoman Aileen Gunther, 100<sup>th</sup> District  
Joseph Salvatore, NPS Upper Delaware Scenic and Recreational River Superintendent  
Cody Hendrix, NPS UDSRR Community and Land Use Planner



# Upper Delaware Scenic Byway

P.O. Box 127. Narrowsburg, NY 12764

April 26, 2021

Susan Williams, Project Manager  
Pennsylvania Department of Transportation  
55 Keystone Industrial Park  
Dunmore, PA 18512-1516  
Via [skinersfallsbridge@aecom.com](mailto:skinersfallsbridge@aecom.com)

Dear Ms. Williams,

The Upper Delaware Scenic Byway, Inc. (UDSB) Committee expresses our organization's steadfast support for the preservation and restoration of the 1902 Milanville, PA-Skinners Falls, NY Bridge as PennDOT studies whether to repair, replace, or eliminate this historic crossing that is located a short distance off New York State Route 97 in our member Town of Cohecton.

Replacing this architecturally unique and airy bridge featuring its single-lane, wood plank deck with an indistinctive, 40-ton concrete structure would forever change for the worse the quaint character of the bi-state communities that the bridge connects. Its well-deserved 1988 listing on the National Register of Historic Places should be honored and respected.

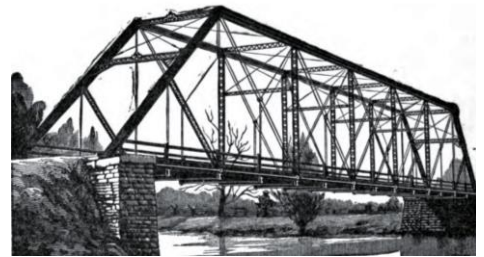
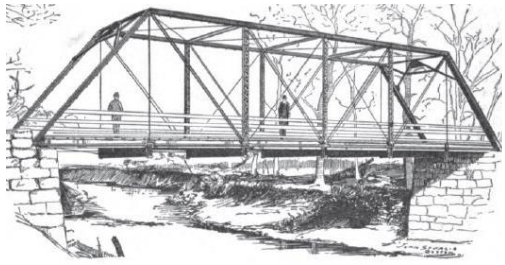
The 2002 UDSB Enhancement Concept corridor management plan recognizes this bridge as a special part of the river valley's cultural story: "Listed on the NRHP, this is a two-span, single-lane iron bridge with a single mortared stone pier. Its construction is a variation of a Baltimore (Petit) through truss. It was built in 1902 by the American Bridge Company for the Milanville Bridge Company and linked the industrial and commercial center of Milanville with the New York and Erie Railroad. Its construction spurred a minor development at Skinner's Falls with the construction of a station and creamery. It was a toll bridge from 1902 to 1928."

This one-of-a-kind bridge stands testament to our historic and aesthetic values. It is also perfectly adequate in size and scope for the setting it serves, including small businesses, attractions, and visitors that are economic drivers for the regional tourism industry that we promote.

The Upper Delaware Scenic Byway urges the rehabilitation and reopening of the Skinners Falls-Milanville Bridge.

Sincerely,

John Pizzolato, Chairperson  
[info@upperdelawarescenicbyway.org](mailto:info@upperdelawarescenicbyway.org)



*Bridge Moving - Historic Truss Bridge Restoration - Custom Fabrication and Erection*

Bach Ornamental and Structural Steel Inc.

Main Office & Shop:  
508 North Mead Street  
St. Johns, Michigan, 48879

Corporate Office:  
4140 Keller Road  
Holt, Michigan 48842

Phone: 517-581-6243  
Email: nels@bachsteel.com  
Website: www.bachsteel.com

May 5, 2021

To Whom It May Concern:

I would like to express strong support for the restoration and preservation of the historic Skinners Falls Bridge over Delaware River. This bridge is an extremely rare example of a multi-span pin-connected Baltimore truss bridge. It is among the oldest known bridges associated with the American Bridge Company, having been built shortly after the company's formation. The bridge is also ornately decorated, including portal knee bracing decoration, portal cresting, decorative builder plaque. There are also original lattice railings that are 20 inches in height and which feature beautiful decorative flower motifs. This is to say nothing of the geometric beauty of the complex Baltimore truss configuration combined with the complexity of the riveted built-up beams that contain v-lacing and lattice.

Bach Steel is in strong support of the restoration of this bridge. We have restored many historic metal truss bridges and we believe this bridge, like others we have restored, would be feasible and cost effective to restore. If fully restored, perhaps by disassembling the bridge and restoring each part individually in a shop setting, this bridge could serve for many decades more with minimal future maintenance costs. Key to keeping these future costs down is a fully comprehensive restoration performed by engineers and contractors with extensive experience doing this type of work.

Bach Steel has been approved by PennDOT for the hot riveting on historic bridges similar to the Skinners Falls Bridge. In our past experience in Pennsylvania we have performed the disassembly, repair, and reassembly of historic truss bridges like this bridge. Bach Steel is a Registered Business Partner (#009978) with PennDOT. We would greatly appreciate an opportunity to bid the restoration work on this bridge.

It is important to have the bridge evaluated by engineers and contractors who have experience restoring historic bridges, as this work differs greatly from modern bridge construction. Experienced engineers and contractors would be able to restore this bridge at lesser cost, but with a better outcome in terms of the repair quality. We want to add our name as strong supporters for the restoration of this bridge. Restoration is feasible, and this is one of the rarest designs of truss in the area, with the bridge's rare Baltimore truss configuration. Should the decision be made to restore this bridge, we stand ready to offer our services.

A handwritten signature in black ink, appearing to read "Nels Raynor". The signature is fluid and cursive, with a prominent initial "N" and "R".

Nels Raynor  
President  
Bach Ornamental and Structural Steel Inc.





United States Department of the Interior  
NATIONAL PARK SERVICE  
UPPER DELAWARE SCENIC AND RECREATIONAL RIVER  
274 River Road  
Beach Lake, Pennsylvania 18405



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“Although it lies just to the west and northwest of the Boston-to-Washington urban corridor, the Upper Delaware River appears untouched by the frenetic pace of the mid-20<sup>th</sup> century. The Upper Delaware and its riverside communities have managed to retain those qualities and values of earlier times which elsewhere have passed into memory, perishing in the onslaught of industrialization, modernization, urban sprawl, and other similar forces of contemporary life. The counties which form the ...region have remained essentially rural...some of these qualities and values may still be seen as they appeared to earlier eyes. This special quality, this pace of daily life, is easily discernible by comparison with the large cites and suburban overflows of the Eastern Megalopolis.”

Fifty years later, the statement above from 1973 still holds true for the Skinners Falls-Milanville area today.

The area that would become Milanville, Pennsylvania was settled by the Delaware Company in 1754-1755, who purchased land from the Lenape and established the Cushetunk settlement. Beginning in the early 19<sup>th</sup> century, the logging industry in the area began when Daniel Skinner, of one of the original Delaware Company families, became famous for the first successful timber rafting trip down the Delaware River. According to the National Register of Historic Places nomination for the Milanville Historic District, “Milanville’s Skinner family, owners of the village sawmill, was the most important lumbering/timber rafting family in the valley.” After the construction of the Erie Railroad on the New York side of the river, the Skinner family influence extended from the Milanville side of the river (where Colonel Calvin Skinner is credited with the naming of Milanville) to the New York side, where a switch (turnout) on the railroad was added in 1888 at the request of Milton Skinner. The nearest bridges at the time to reach the railroad being at Cochection, 3 miles north or Narrowsburg, 3 miles south, Milton and his brother, Volney, installed a ferry boat just upriver from the current bridge to get their goods to the railroad switch (and later in 1920 a depot named, Skinners Falls) for market. Eventually the need for a bridge was realized and Milton was instrumental in organizing the Milanville Bridge Company, which contracted the American Bridge Company to construct a bridge beginning in 1901, with completion in 1902. The bridge was designed to limit its width to accommodate only one-way traffic, so as to not compete with the more efficient and existing two-way traffic toll bridges at Cochection and Narrowsburg, the bridge was operated as a toll bridge until 1928, when it was purchased by the Interstate Bridge Commission.<sup>1</sup>

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"Heritage tourism uses assets — historic, cultural and natural resources — that already exist. Rather than creating and building attractions, destinations look to the past for a sustainable future. Indeed, these assets need preservation and often restoration or interpretation, but the foundation for creating a dynamic travel experience lives on in the stories and structures of the past."<sup>2</sup> Factors that have recently increased interest in American heritage are<sup>3</sup>:

1. People are taking shorter holidays and vacations – This is particularly true since the 2020 pandemic. According to Colleen Dilenschneider, a leading commentator for cultural organizations on making data-informed decisions, survey data on spring break plans for 2019 compared to 2021 reveals that fewer people plan to travel further than 150 miles from home this year; that most people traveling further than 150 miles plan to do so by personal vehicle; and that over half of those traveling will spend one night or less away from home.<sup>4</sup>
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3. Authentic places are important to understanding history and culture – In order to value the present, we must understand our past.
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The National Trust for Historic Preservation has identified 10 Benefits of Establishing a Local Historic District, which could also be said for investing and protecting current districts, such as the Milanville Historic District, and their contributing resources, i.e. the Skinners Falls-Milanville Bridge:

1. Local districts protect the investments of owners and residents of historic properties.
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Thoughtful and sensitive Investment in Milanville Historic District and National Register listed Skinners Falls-Milanville Bridge preserves an important example of the Upper Delaware Scenic and Recreational River Cultural and Scenic ORVs and provides economic support for the residents and local business owners in this community, which has voiced support for a crossing that meets the needs of the community while preserving their history.

**In addition to the historical and scenic importance of the bridge, this river crossing is also vital for connecting emergency service providers to the areas where there are incidents requiring law enforcement and medical services.**

**The Skinners Falls NYSDEC Access is a heavily-used river access that frequently requires emergency service response to, the closest of which comes from the NPS Milanville, PA office. This river location has the most challenging rapids on the Upper Delaware River, and has been the site of numerous drownings and injuries in the past.**

**Recreation is another one of the Upper Delaware Scenic and Recreational River's identified Outstandingly Remarkable Values. The Upper Delaware River is known for its outstanding recreational opportunities, activities, and access in proximity to millions of people in America's most densely populated region. It provides high quality, affordable natural recreational experiences, which include boating, swimming, tubing, fishing, hiking, biking, wildlife viewing, birding, and scenic touring, and supports the largest canoe livery industry in the United States. The Skinners Falls Access, beach area, and nearby campground comprise one of the most heavily used locations on the river, and the Skinners Falls/Milanville Bridge is integral to recreation on this part of the river.**

I hope this letter assists with identifying the importance of repairing and rehabilitating the Skinners Falls-Milanville Bridge in the Purpose and Need Document, a part of the Federal Highways Planning and Environmental Linages (PEL) process.

Sincerely,

Joseph Salvatore  
Superintendent  
Upper Delaware Scenic & Recreational River

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<sup>7</sup> <https://savingplaces.org/stories/10-on-tuesday-10-benefits-of-establishing-a-local-historic-district#.YK0lw6hKgps>



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10. Local districts give communities a voice in their future.<sup>7</sup>

Thoughtful and sensitive Investment in Milanville Historic District and National Register listed Skinners Falls-Milanville Bridge preserves an important example of the Upper Delaware Scenic and Recreational River Cultural and Scenic ORVs and provides economic support for the residents and local business owners in this community, which has voiced support for a crossing that meets the needs of the community while preserving their history.

**In addition to the historical and scenic importance of the bridge, this river crossing is also vital for connecting emergency service providers to the areas where there are incidents requiring law enforcement and medical services.**

**The Skinners Falls NYSDEC Access is a heavily-used river access that frequently requires emergency service response to, the closest of which comes from the NPS Milanville, PA office. This river location has the most challenging rapids on the Upper Delaware River, and has been the site of numerous drownings and injuries in the past.**

**Recreation is another one of the Upper Delaware Scenic and Recreational River's identified Outstandingly Remarkable Values. The Upper Delaware River is known for its outstanding recreational opportunities, activities, and access in proximity to millions of people in America's most densely populated region. It provides high quality, affordable natural recreational experiences, which include boating, swimming, tubing, fishing, hiking, biking, wildlife viewing, birding, and scenic touring, and supports the largest canoe livery industry in the United States. The Skinners Falls Access, beach area, and nearby campground comprise one of the most heavily used locations on the river, and the Skinners Falls/Milanville Bridge is integral to recreation on this part of the river.**

I hope this letter assists with identifying the importance of repairing and rehabilitating the Skinners Falls-Milanville Bridge in the Purpose and Need Document, a part of the Federal Highways Planning and Environmental Linages (PEL) process.

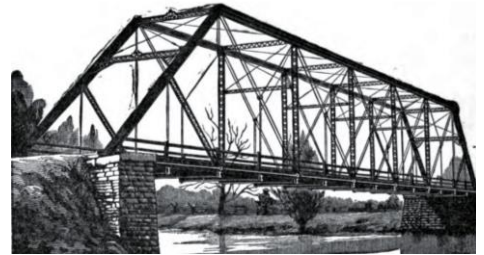
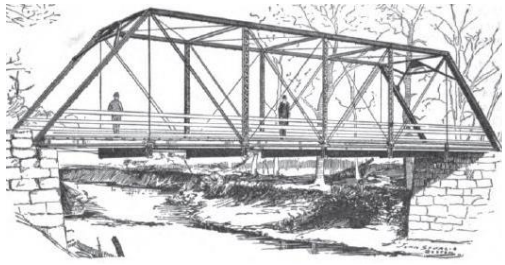
Sincerely,

Joseph Salvatore  
Superintendent  
Upper Delaware Scenic & Recreational River

---

<sup>7</sup> <https://savingplaces.org/stories/10-on-tuesday-10-benefits-of-establishing-a-local-historic-district#.YK0lw6hKgps>





*Bridge Moving - Historic Truss Bridge Restoration - Custom Fabrication and Erection*

Bach Ornamental and Structural Steel Inc.

Main Office & Shop:  
508 North Mead Street  
St. Johns, Michigan, 48879

Corporate Office:  
4140 Keller Road  
Holt, Michigan 48842

Phone: 517-581-6243  
Email: nels@bachsteel.com  
Website: www.bachsteel.com

May 5, 2021

To Whom It May Concern:

I would like to express strong support for the restoration and preservation of the historic Skinners Falls Bridge over Delaware River. This bridge is an extremely rare example of a multi-span pin-connected Baltimore truss bridge. It is among the oldest known bridges associated with the American Bridge Company, having been built shortly after the company's formation. The bridge is also ornately decorated, including portal knee bracing decoration, portal cresting, decorative builder plaque. There are also original lattice railings that are 20 inches in height and which feature beautiful decorative flower motifs. This is to say nothing of the geometric beauty of the complex Baltimore truss configuration combined with the complexity of the riveted built-up beams that contain v-lacing and lattice.

Bach Steel is in strong support of the restoration of this bridge. We have restored many historic metal truss bridges and we believe this bridge, like others we have restored, would be feasible and cost effective to restore. If fully restored, perhaps by disassembling the bridge and restoring each part individually in a shop setting, this bridge could serve for many decades more with minimal future maintenance costs. Key to keeping these future costs down is a fully comprehensive restoration performed by engineers and contractors with extensive experience doing this type of work.

Bach Steel has been approved by PennDOT for the hot riveting on historic bridges similar to the Skinners Falls Bridge. In our past experience in Pennsylvania we have performed the disassembly, repair, and reassembly of historic truss bridges like this bridge. Bach Steel is a Registered Business Partner (#009978) with PennDOT. We would greatly appreciate an opportunity to bid the restoration work on this bridge.

It is important to have the bridge evaluated by engineers and contractors who have experience restoring historic bridges, as this work differs greatly from modern bridge construction. Experienced engineers and contractors would be able to restore this bridge at lesser cost, but with a better outcome in terms of the repair quality. We want to add our name as strong supporters for the restoration of this bridge. Restoration is feasible, and this is one of the rarest designs of truss in the area, with the bridge's rare Baltimore truss configuration. Should the decision be made to restore this bridge, we stand ready to offer our services.

A handwritten signature in black ink, appearing to read "Nels Raynor". The signature is fluid and cursive.

Nels Raynor  
President  
Bach Ornamental and Structural Steel Inc.

From: Patti Moorhead <president.callicoon@gmail.com>  
Subject: Skinners Falls Bridge, Milanville PA  
Date: April 30, 2021 at 4:16:59 PM EDT  
To: Skinnersfallsbridge@aecom.com, DamascusCitizens <dcs@damascuscitizens.org>, susawilla@pa.gov

The members of the Callicoon Business Association voted unanimously to support the rehabbing of Skinners Falls Bridge. Callicoon is a popular hamlet 11 miles from the Skinners Falls Bridge. There is overwhelming community support for this historic bridge to be restored in order to maintain its original character.

Despite the claim that a larger bridge might help with tourism, the exact opposite is true. Tourists come to this area precisely because of the historic landmarks, like the bridge, not to drive over a brand new 40T bridge which is too large for the roadways on both sides of the river.

Please extend the comment period for Skinners Falls Bridge.

On behalf of the Callicoon Business Association members  
Sincerely,  
Patti Moorhead

-

Patti Moorhead  
President  
Callicoon Business Association  
PO Box 303  
Callicoon NY 12723  
845-887-5500

Virus-free. [www.avast.com](http://www.avast.com)

From: DamascusCitizens <dcsc@DamascusCitizens.org>  
Subject: Skinners Falls Bridge  
Date: April 30, 2021 at 10:29:05 PM EDT  
To: Susawillia@pa.gov, skinnersfallsbridge@aecom.com, Damascus Citizens  
<dcsc@damascuscitizens.org>

below ALSO attached as PDF, with 2016, 2019 NPS letters and UDC letter

Ms. Susan Williams  
Senior Civil Engineer Supervisor Civil  
Pa Department of Transportation Liaison Unit  
55 Keystone Industrial Park  
Dunmore, PA 18512

**Re: PENNDOT D4 Skinner's Falls Project – Interstate Bridge #5**

Dear Ms. Williams:

As legal counsel to Damascus Citizens for Sustainability (DCS) I am submitting this letter to support DCS's comments and to request an additional six months to develop legal and scientific responses to technical arguments which might be made by PennDOT to destroy the bridge, whether to replace it or remove it. While New York and Pennsylvania share joint ownership of the Skinner's Falls Bridge, it is the National Park Service that has review authority over actions taken that affect the bridge. The bridge is located in a portion of the river where there is considerable recreational use and emergency response uses, as documented in a letter from the superintendent of the National Park Service (NPS) to PennDOT dated March 3, 2016 and the July 26, 2019 NPS letter that also lays out all the required actions, plans, permits, etc that protect the bridge. The NPS is also a member of the Upper Delaware Council (UDC). The UDC, the Park Service and representatives from the towns and townships adjacent to the river that are the UDC, have come together to urge in a joint letter that the Skinner's Falls Bridge be repaired, restored and maintained rather than removed or replaced. The applicable regulatory requirements are covered in the adopted statement by the UDC. DCS will support a program that is grounded on repair, restoration, and maintenance of the Skinner's Falls Bridge. DCS will oppose, in the courts if necessary, any proposal that would remove the Bridge.

There is another important aspect of the regulatory structure that applies to the Skinner's Falls Bridge and the Milanville historic district. Section 4(f) of the Transportation Act of 1966 (49 U.S section 303) applies special protection to wildlife areas and historic sites. Section 4 (f) provides that a project can only be approved by the Secretary if the activity will have no more than a de minimis impact on the resource at issue. Destruction of the Skinner's Falls bridge is clearly not de minimis.

Page 2

Also, Pursuant to the federal Freedom of Information Act (FOIA), the New York Right to Know Act and the Pennsylvania Right to Know Act, DCS hereby requests copies of all documents that include any information related to the Skinner's Falls Bridge and consideration of your decision-making leading to the presentation March 30 with the

three choices to repair or remove or replace with a 40 ton 2 lane new bridge, favoring the 40 ton replacement option as shown in slider 27 and 28 in the presentation: <https://www.penndot.gov/RegionalOffices/district-4/PublicMeetings/Wayne%20County/Documents/Skinners%20Falls%20Bridge%20Public%20Meeting%20Presentation.pdf> . DCS would appreciate it if these documents can be made available electronically. Further, DCS is a non-profit corporation and requests a waiver of any costs incurred in response to this document request.

Sincerely yours

John J. Zimmerman, Esq. Jeff Zimmerman

Zimmerman & Associates

13508 Maidstone Lane

Potomac, MD 20854

(240) 912-6685 (office)

(202) 262-9664 (cell)

[zimmermanjj@verizon.net](mailto:zimmermanjj@verizon.net)

DCS Counsel

B. Arrindell,

Director

Damascus Citizens for Sustainability

## The Milanville Bridge – from 1901 to 2017



November 6, 2016 – looking toward New York from Milton Skinner's home and barn in Pennsylvania. In 1900 Skinner formed a corporation that paved the way for building this bridge.



A weathered plaque at the Milanville Bridge honors local men whose dream it became, and the craftsmen who built it.

# A Bridge for Milanville

## The Upper Delaware River at Milanville

**The view from Pennsylvania** (below) looks toward Skinners Falls, a set of rocky ledges and boulders where NY and PA hills pinch together at the base of this pool. Ice covers two quiet eddies. The Milanville Bridge is just upstream, where Milton and Volney Skinner ran a busy ferry in the 1890s.

In 1764 Daniel Skinner, Milton's great-grandfather, pinned together six pine logs, mounted a steering oar, and set off from here to sell them at Philadelphia shipyards – inventing a river-based timber industry that lasted 150 years.

Rafting in spring to markets in Trenton and Philadelphia, he and others used freshets caused by melted snow to run tricky pools and rapids: from Cochection Falls upstream (now Skinners Falls), to Otter Eddy and Foul Rift farther south.



Looking toward Skinner Falls, hidden behind trees on the far right. Daniel Skinner and other men assembled timber rafts on this pool as soon as winter ice was gone,

## A \$14,000 Investment



Looking upriver from the PA shore in the early 20th century, a company toll house on the left.

**At the close of the 19th century** heavy ferry traffic to and from New York's Erie Railroad across the river prompted Milton Skinner to seek a permanent connection to the Erie by forming the Milanville Bridge Company.

In 1901 company directors hired New York City's American Bridge Company to build a 470' steel bridge at the ferry crossing, tendering \$14,000 for a job completed in November, 1902.

Later, as a unit of Andrew Carnegie's U.S. Steel Corporation, American Bridge built New York Harbor's famous Verrazano-Narrows Bridge and some of the world's most challenging suspension and truss bridges.

Milanville's 1901 bridge is a rare handiwork, still in use, that dates from the company's beginning.

## Milanville's Timber Industry

During an early career as a sailor, Daniel Skinner saw a need for tall, straight trees to build masts for sailing ships. Settling near present-day Milanville he found ideal stands of white pines and in 1764 solved the problem of getting them to urban shipyards and sawmills.



A log raft near Hancock NY, the steersman at right. Boys in front were heading to nearby towns. (Courtesy of Colchester NY Historical Society).

**Milanville's timber industry** diversified after 1850 to supply its new tannery with tons of hemlock bark (ca. 1849 - 1880). The business of tanning leather for household and industrial uses earned Eli Beach & Son \$116,829 in 1869, equal to \$1,969,060 in 2016 dollars. But when hemlock forests disappeared in the 1880s the tannery was abandoned.

In 1898 W.S. Brandt, who became a bridge company director, began an acid factory at the tannery site, distilling chemicals such as wood alcohol from hardwood trees. To distill products for the U.S. munitions industry in World War I they burned 21 hardwood cords a day. Ironically, synthetic chemicals developed by German laboratories during the war spelled an end to Upper Delaware acid factories.

## "Rafting Rock"



In this view, which repeats one on the first page, Skinners Falls lies around a bend at top right. "Rafting Rock" is at top left.

**From Skinners Falls** (then called Cochection Falls) it took Daniel Skinner eight days to reach Philadelphia in 1764, and two weeks to walk home. But his raft, built of six 80' pine logs, sold for \$120 in gold!

In 1828, when grandson Calvin was rafting logs, *Hazard's Register of Pennsylvania* estimated a thousand timber rafts "ran" the river - their volume "equal to fifty million board feet of lumber." And the traffic tripled by mid-century.

**Ironmen**, as steersmen were called, gauged water levels at Skinners Falls by checking the giant boulder at upper left. If spring freshets topped this "rafting rock" the coast was clear. If it got *too* high they'd tie up in a Milanville eddy and wait.



## Opening Doors

In 1882 the brothers Milton and Volney Skinner built a sawmill upstream from powerful rapids at Skinners Falls. Sawdust fired a boiler that powered saws whose peak capacity was 10,000 board feet a day.

After the bridge opened in 1902 wagons with lumber and milk cans rattled across to an Erie Railroad siding, along with chemicals distilled from hardwood trees at Milanville's acid factory.



An early 20th-century view of the Skinners' sawmill, with lumber stacked in the right foreground. An original fieldstone pier at mid-river still supports both spans of the bridge. The Skinners sold their sawmill in 1905 and a new owner dismantled it in 1918. (Courtesy of Lorraine McGrath.)



Looking toward the Milanville Bridge, whose NY portal is behind a tree in the left center. A crossing signal marks the former road bed of the Erie Railroad, maintained today by a local, short-line railroad.

**Erie Railroad work crews** reached the Delaware River Valley at Port Jervis, NY, in December, 1847 and were soon laying track in our region.

During World War I chemicals distilled at Milanville's acid factory were in high demand for making explosives. In 1917, this and other heavy traffic led a NY court to order the Erie to build a station and depot near the bridge. "Skinners Falls" became the name of the station, and of a settlement that grew there.

# Floods and Ice Jams



**The picture** above shows a February, 1945 ice jam that clogged the river at Narrowsburg, five miles below, and nearly reached the deck of the Milanville Bridge.

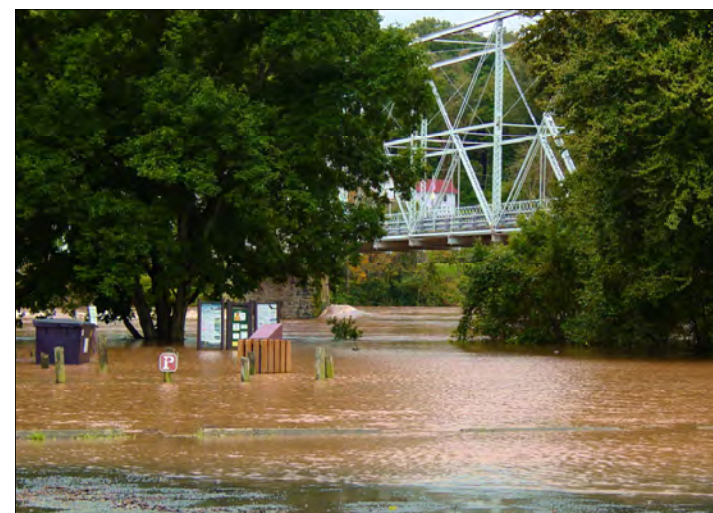
A photographer who looked across from NY wrote below his photograph: *“February 1945 ice lies 8 feet from the base of Milanville Bridge.”* The picture, minus frame, hangs on a back wall of the Milanville General Store.

**Ice jams are common** on the Upper Delaware River, and occasionally like one that pummeled Skinners Falls in March 1904. Driven by flood waters, a giant ice sheet wrenched away the NY bridge span until both ran aground at the falls. (The Milanville Bridge was reopened seven months later.



**A view** of the Milanville Bridge (below) from a NY parking lot during a “100-year flood” that crested on September 18, 2004. Six and a half months later an April flood rose higher, snatching a car from a nearby campground (above).

At Cochecton, three miles upriver, historic floods and ice jams have destroyed four bridges since 1820, the last one in 1902.



In the picture floodwaters are ebbing after they crested close to the bridge deck.

# The Artistry of 1901 Bridge Builders



Decorative crests on NY and PA portals.



A corner crest in summer light.

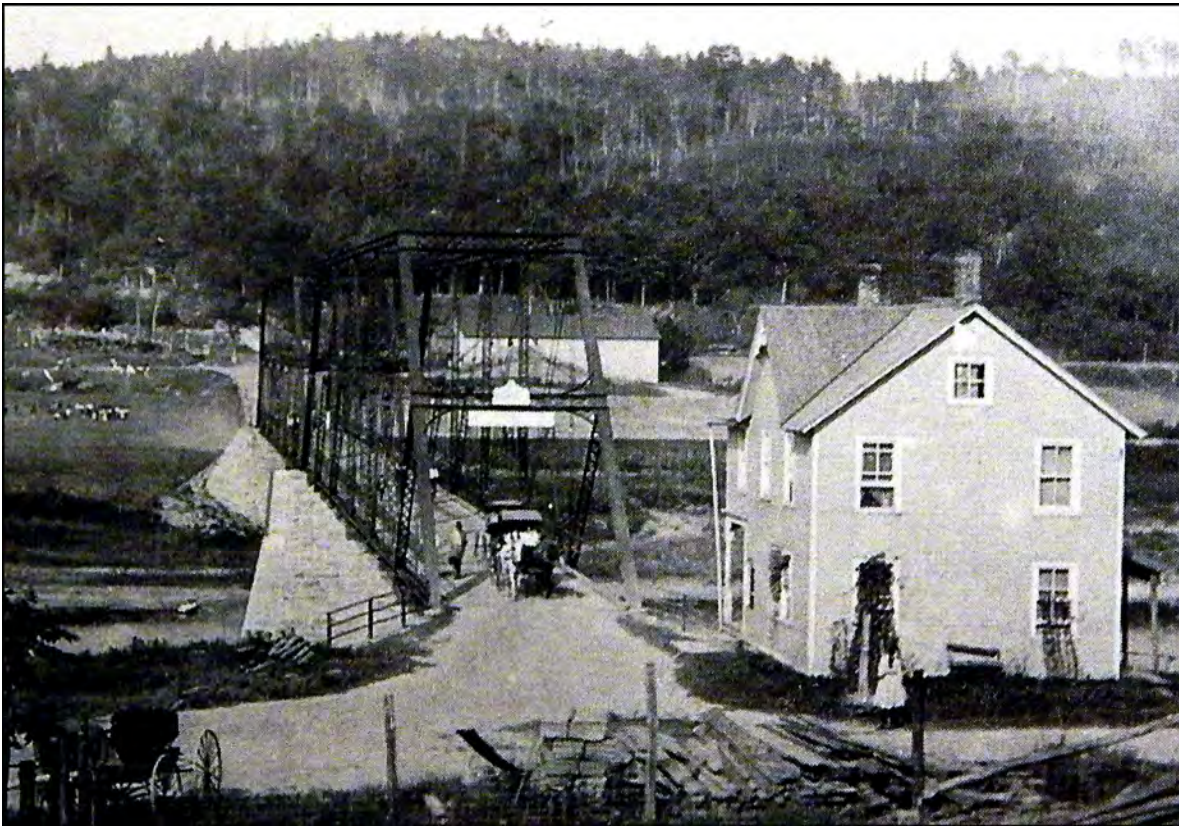


Flower motifs on bridge railings.



Struts and trusses.

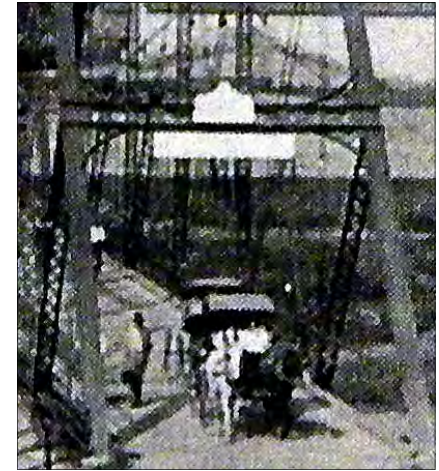
## A Team and Carriage Entering Milanville – Undated Photograph



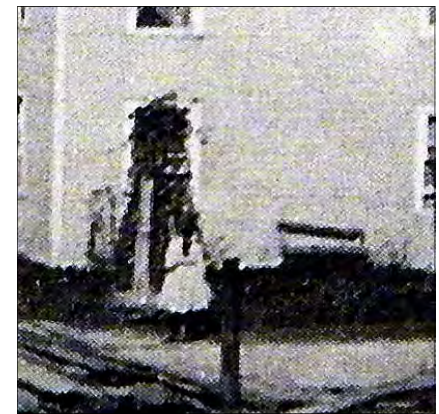
I can't resist adding this photograph from Barbara Davis Dexter's book *Around Damascus Township*, with its picture credit to Helen Dexter, Milanville's tireless historian.

It's especially for readers who remember horse-drawn teams. Or for "bad boys" (now "elders") who may have dipped a pigtail into an elementary school inkwell. "Zooming" with a computer adds detail in the right-hand pictures.

A long rectangular building on the New York side (seen through bridge trusses) is an Erie Railroad milk station, built during World War 1. The bridge gave Milanville farmers and dairymen daily access to New York City markets.



A two-horse carriage and driver— a white horse on the left, a dark one on the right.



A young girl in a white dress at the near side of the toll house. Note her pigtail.

# What's a Baltimore Truss?

In a “Truss” bridge elements of the framework connect to make triangular units. By adding triangles engineers increase strength and load distribution – the goal of a Baltimore Truss.

Baltimore and Ohio (B&O) railroaders tinkered with this design in the 1870s, and American Bridge Company engineers adapted it for use at Milanville in 1901–02. (Both Truss diagrams are courtesy of Wikipedia)

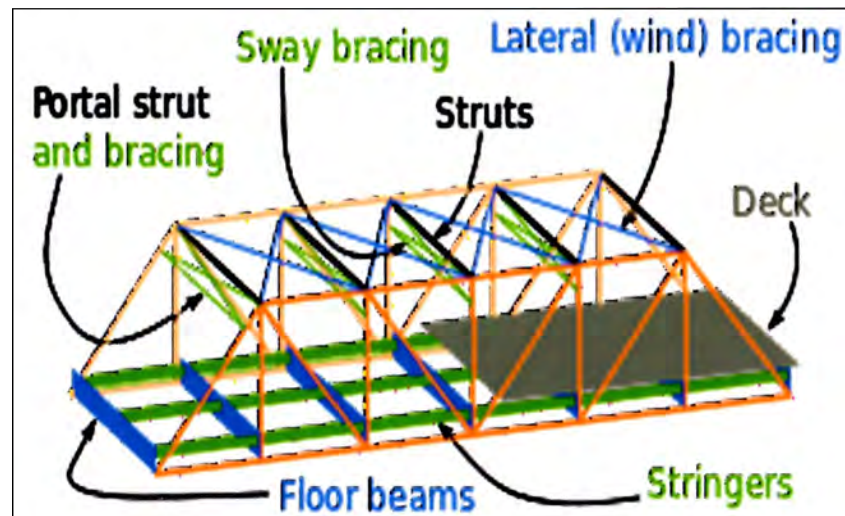


The diagram (left) has many triangles large and small: an engineering strategy that spreads a load to large areas. A truss bridge is economical to build because it uses materials efficiently.

(diagrams courtesy of Wikipedia)



Note the triangles in our 2004 flood picture.



# Maintaining the Milanville Bridge



The Milanville Bridge, from a hill 1/2 mile upriver.

## RECENT CLOSINGS

**January, 2010:** PennDot funded emergency repairs at the PA bridge portal.

**December 2012:** PennDOT closed the bridge when inspectors deemed it unsafe. Repairs were made and the load capacity reduced to 4 tons.

**December 16, 2015 – November 2016:** On 12/15 PennDOT announced it would close the Milanville Bridge “indefinitely.” This sparked a petition drive by Vanessa DeGori at her Milanville store that by July had enrolled about 2000 bridge supporters . In late summer repairs began that permitted PennDOT to reopen the bridge on November 10. Overhead bars at each end will enforce a ban on heavy trucks and limit loads to 4 tons.

## MAJOR RENOVATIONS

**March 26, 1904:** Ice-clogged floodwaters knocked the bridge’s New York span into the Delaware River. The Owego Bridge Company, hired in May for \$7000, replaced the span and reopened the bridge that autumn.

**1986–1987:** The PA Department of Transportation (PennDOT) made extensive repairs to floor beams and stringers. According to bridge historian Frank Dale: “Floor beams and trusses were replaced, new guide rails constructed, and the whole bridge repainted” – without destroying its historic fabric.



Workmen at the bridge in January 2010. Despite frigid conditions they soon finished the job. Note ice on the Delaware River.

# 19th-Century Milanville



Calkins Creek enters the River at the right.  
 The Eli Beach tannery is at far left.  
 Volney Skinner's home / hotel is left center, at a major road junction. The same roads carry modern traffic.  
 Eli Beach lived just north of the road junction.



A 1900 postcard view of Milanville, from NY. (Courtesy of Lorraine McGrath)  
 A white ribbon across the bottom is snow.  
 A dark ribbon above it, with filaments of ice, is the Delaware River.  
 Frozen ice, like a white tongue, is at the mouth of Calkins Creek.  
 A smoke plume, far right, marks the acid factory. .



A Delaware River ferry. The Skinners probably ran a similar, but larger "scow" at Milanville - with room for passengers and a couple of wagons. The ferryman (front) lowers a "dropboard" at the landing place. Ropes attached the scows to overhead cables secured at each shore. By angling the bow upstream a ferrymen let the river's current push him across.

(Courtesy of Elizabeth Lotterer)



In 1900 our present Milanville General Store was then a "company store" on this side of the acid factory. The store is identified by a shubby evergreen in front.

# Milanville's Historic District

Milanville's Historic District was placed on the U.S. National Register of Historic Places in 1988. Its 14 listed structures include nine homes and the Milanville Bridge. Five listed properties are below.



Milanville General Store, c. 1850



Methodist Church, 1910



Volney Skinner's "Milanville House."  
Built c. 1840, enlarged in 1864



Milton Skinner House near bridge, c. 1900



Milanville School House, c. 1880



**NOT LISTED.** This mid-20th century Milanville house is a Resource Management center for the National Park Service. Staff biologists monitor the health of the Upper Delaware National Scenic River – from water quality, to bald eagles and cliff swallows (which nest beneath the bridge deck).



# Bridge Notes (1)

**Owner (1901—1928):** the Milanville Bridge Company, chartered by PA and NY in 1900 to construct a Delaware River toll bridge at Milanville.

**Current owner:** the “New York–Pennsylvania Joint Interstate Bridge Commission,” formed in the 1920s to purchase 10 private toll bridges on the Upper Delaware River and to operate them toll free. In 1928 the Commission bought the Milanville Bridge for \$19,542.22. PennDOT maintains five of the ten bridges, including Milanville’s.

**Construction:** Work began in 1901 and was completed in November, 1902.

**Cost (in 1901 dollars):** \$14,000.

**Builder:** The American Bridge Company of NYC, owned by world-famous financier J.P. Morgan. In 1902 American Bridge was acquired by Andrew Carnegie’s United States Steel Corporation.

**Design:** Steel, with twin Baltimore Truss spans supporting a one-lane road.

**Length:** 470 feet

**National Recognition:** The Milanville Bridge is listed on the *U.S. National Register of Historic Places* and on the *National Register of Historic Bridges*. It is a vital part of the *Milanville Historic District*.



Looking toward Milanville. The Skinner sawmill was on a shelf above the river, about 300’ left of the bridge.

## A Sample of Tolls & Toll Income – Milanville Bridge Co.

One pedestrian (one way)	3 cents
Horse and carriage (one way)	15 cents
Horse and wagon (round trip)	35 cents
One sheep	2 cents
Clergymen	free
Earnings from tolls (1911)	\$1,254.59

(toll for one carriage = \$4.03 in 2016 dollars)  
(1911 earnings from tolls = \$33,742 in 2016 dollars)

## Bridge Notes (2)

To fill a few gaps I've added sidebars about local bridges, rafting, and ice jams. Thick ice at Narrowsburg, "home grown" or swept-in, has been a lasting concern of Upper Delaware bridge planners.

### *(1) Why does Milanville have a one-lane bridge?*

When Milanville sought bridge charters from PA and NY legislatures, bridge owners at Narrowsburg (five miles down) and Cochection (3 miles up) foresaw big drops in toll revenues. It's likely, say historians, that lawyers struck a deal when Milanville agreed to a one-lane bridge.

### *(2) What was the biggest timber raft on the Delaware River?*

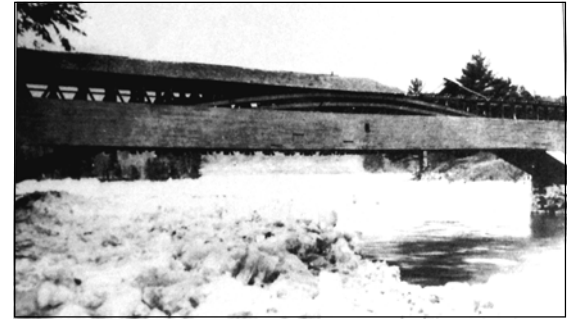
According to Delaware Valley historian Frank Dale, "In 1861 Bill Parks...captained a timber leviathan 60' wide and 190' long that contained more than 120,000 board feet of lumber." During the voyage he and his 12-man crew took aboard 3500 railroad ties.

### *(3) When did a final timber raft navigate the Delaware?*

Frank Dale writes that decades of heavy logging had depleted available forests, and "by 1905 timber rafts were a rarity...In 1917, during World War I, a single raft appeared on the river, traveling to Bordentown [NJ] with logs to be used on pilings."

### *Did Upper Delaware communities build wooden covered bridges?*

Yes - steel was decades away. At Cochection, just above Milanville, the town's first five bridges were made of wood and were covered: (1) In 1817 the Cochection Bridge Company financed a 550' bridge that collapsed a year later. (2) A devastating 1846 flood smashed a replacement. (3) An 1848 flood smashed bridge number 3. (4) In February, 1857 an ice jam flood claimed number 4. (5) A final covered bridge survived until 1902, when a flood swept away most of the village.



A 19th-century ice jam at Narrowsburg's covered bridge, looking downriver.



Looking upriver on 3/3/06, when two feet of ice covered Narrowsburg's Big Eddy. The town's 1953 bridge is in the distance.



Remnants of a Narrowsburg ice jam. Looking downriver, 3/19/03.

# The Future...

It was reassuring on November 12 to observe traffic on the Milanville Bridge, and a “Super Moon” reflected from the Delaware River – the moon’s closest approach to Earth since 1947. But a prominent rust stain on a bridge girder reminds us that PennDOT’s 2016 repairs are stop-gap.

Pretty soon the Agency must choose: (1) to rehabilitate our historic bridge for the long term; (2) to build a new bridge here; or (3) after the Milanville Bridge wears down, to leave NO viable bridge.

A clue to their recent thinking may lie 35 miles downriver at Pond Eddy, PA where PennDOT and the Federal Highway Administration are replacing an historic 1904 truss bridge with a new one that’s under construction.

Historic preservation organizations believe that cards were stacked from the start *against* restoring the 1904 bridge, and three of them refused to sign a “Memorandum of Agreement” to approve a new bridge: The National Trust for Historic Preservation, The Historic Bridge Foundation, and Friends of Pond Eddy.

New York’s Historic Preservation Office also rebuked PennDOT, writing that *“Demolition of the historic resource was a foregone conclusion and all efforts were directed at demolishing the [1904] bridge.”*

As an addendum, the U.S. President’s Council on Historic Preservation reports it was asked to intervene in nine contemporary PennDOT projects by “citizens concerned about the demolition of small, locally significant bridges.”

To contact the writer: ewesely@ptd.net



**A personal note:** PennDOT and the Federal Highway Administration are spending about \$17 million at Pond Eddy to replace an existing 1904 bridge that carries “light” traffic between PA and Route 97 in NY. Their new bridge will have a 35-ton load capacity. The so-called PA “community” they will “serve” consists of a few scattered cabins in the woods and several houses.

In Milanville, meanwhile, we have a vibrant community with roots in colonial America – with 14 homes and structures (including our bridge) listed on the National Register of Historic Places. The National Park Service also maintains a Resource Management office in town for managing the ecology of the Upper Delaware National Scenic and Recreational River.

The Milanville Bridge fits hand and glove into this remarkable setting, Treasured by residents and visitors, it would be tragic to close it for good. It must be preserved for present and future generations.

## Supplement to Upper Delaware Scenic and Recreational River

### Outstandingly Remarkable Value Category: Cultural

#### Introduction

The *Delaware River Basin National Wild and Scenic River Values* (NPS 2012a) report highlights the importance of petite and through-truss steel bridges and stone arch bridges in the Upper Delaware corridor as elements of the Cultural Outstandingly Remarkable Value. Of the six images used to illustrate important examples of Cultural elements within the report, one is of the Stone Arch Bridge at Ten Mile River and another is of the Skinners Falls-Milanville Bridge (page 20). However, during the 2012 Outstandingly Remarkable Value (ORV) Workshop, the bridges listed below were determined to not meet the ORV criteria for Cultural Resources (NPS 2012b).

#### Determination

Upon further research and following a discussion with the Wild and Scenic River Interagency Steering Committee at their annual meeting in September 2019 (hosted by Upper Delaware Scenic and Recreational River), the National Park Service (NPS) received confirmation that the treatment of the following bridges as elements of the Cultural Outstandingly Remarkable Value is appropriate and consistent with the treatment of historic bridges by other Wild and Scenic Rivers. This supplement constitutes NPS' determination that the following bridges contribute to the Cultural Outstandingly Remarkable Value at Upper Delaware Scenic and Recreational River:

1. Skinners Falls-Milanville Bridge, 1902
2. Hankins Creek Stone Arch Bridge, 1905
3. Ten Mile River Stone Arch Bridge, 1896

#### Justification

The 2012 ORV Evaluation Matrix states, *"To determine that a resource is part of a outstandingly remarkable cultural value, the resource must be listed or eligible for listing on the National Register of Historic Places...AND resources must be found to meet the criteria under number 5, number 6, and number 7 in the matrix."*

Criterion 5 states that a site or feature is associated with a significant event, important person, or cultural activity. Criterion 6 states that in combination, [the element] contributes to [a] continuum that constitutes [a] rare, unique or exemplary resource. Criterion 7 states that the element is rare, unique, or exemplary (best example of many existing resources or one-of-a-kind in the region). ***Meeting these criteria is required to qualify for listing on the National Register (36 CFR 60.4):***

#### CRITERIA FOR EVALUATION:

The quality of significance in American history, architecture, archeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and:

- A. That are associated with **events that have made a significant contribution to the broad patterns of our history**; or
- B. That are associated with the lives of persons significant in our past; or

C. That embody the **distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction**; or

D. That have yielded, or may be likely to yield, information important in prehistory or history.

#### Discussion of Bridges Included in This Determination

- Skinners Falls-Milanville Bridge – an intact example of a two-span steel Baltimore Truss bridge constructed in 1902 by the American Bridge Company over the Delaware River connecting the Skinners Falls (Cochecton, NY) and Milanville, PA communities. Listed on the National Register in 1988 for significance under Criterion C – Engineering (Spero 1988), the bridge is also highlighted as a rare steel truss bridge in the 1992 Multiple Property Documentation Form National Register Listing, *Historic and Architectural Resources of the Upper Delaware Valley, New York and Pennsylvania* (Curtis 1992). The bridge is listed as a Contributing Resource in the “Milanville Historic District” National Register of Historic Places Registration Form (Curtis 1993). The Milanville Historic District is significant for its connection to Industry and Architecture under Criteria A and C. According to the report, *A Context for Common Historic Bridge Types* prepared for The National Cooperative Highway Research Program, the Transportation Research Council, and the National Research Council in 2005, Baltimore Truss Bridges are “Significant”; particularly highway bridge examples, which are not common.

The Skinners Falls-Milanville Bridge is the oldest example of an American Bridge Company Baltimore Through Truss Highway Bridge in the United States. Of extant Baltimore Through Truss Bridges in Pennsylvania and New York, the Skinners Falls-Milanville Bridge is the earliest example in the Upper Delaware region, in its original location, with multiple spans that is still in use as a highway bridge. A 2017 PennDOT Metal Truss Bridge Reevaluation states that the Skinners Falls-Milanville Bridge is noteworthy for the following reasons: an uncommon type, early example of type/design in the state, earliest example of type/design in district 4, regionally rare, with multiple spans, exhibits artistic value (lattice railing, highly ornamental and decorative cresting, and bridge plaque), and association with important designer, builder, or engineer.

- Hankins Creek Stone Arch Bridge and Ten Mile River Stone Arch Bridge – The Hankins Creek Stone Arch Bridge is a one-span masonry arch approximately 40’ in length constructed of hand-laid stones in 1905. It was built by John Inman as contracted by the Town of Fremont, NY and is currently restricted to pedestrian traffic.

The Ten Mile River Stone Arch Bridge is a two-span stone arch bridge 51’ in length constructed in 1896 by William H Hankins and Co., of Tusten, NY. This bridge is still open to vehicular traffic.

Both the Hankins Creek and the Ten Mile River Stone Arch Bridges were added to the National Register in 2000 under Criterion A for significance in the area of community planning and development as an important component in the development of the river valley’s transportation infrastructure during its halcyon years as a center of industry and recreation. The bridges are also significant under Criterion C as they are “rare and intact example[s] of traditional stone arch bridge construction within the context of *Upper Delaware River Transportation Resources...* only two traditional stone arch bridges remaining in the 74-mile long Upper Delaware Scenic and Recreational River corridor” (Curtis/Peckam 2000). The *Context for Common Historic Bridge*

*Types* (Parsons 2005) considers Stone Arch bridges from the late 18<sup>th</sup> and early 19<sup>th</sup> century of the highest level of significance (Curtis/Peckam 2000).

#### Bridges Needing Further Evaluation

Bridges that should be re-evaluated for contribution to the Cultural Outstandingly Remarkable Value are the following, which have been determined eligible for the National Register of Historic Places:

1. Kellams-Stalker Bridge, 1890 – a rare early suspension bridge over the Delaware River (Hankins, NY-Stalker, PA)
2. Cochection-Damascus Bridge, 1950 – a Warren Truss bridge over the Delaware River (Cochection, NY-Damascus, PA)
3. Railroad Bridge #9, 1904 – Pratt Through Truss bridge over the Delaware River (Tusten, NY)
4. Railroad Bridge #2, 1906 – a Pratt Deck Truss bridge over the Delaware River (Mill Rift, PA)

#### References

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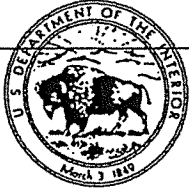
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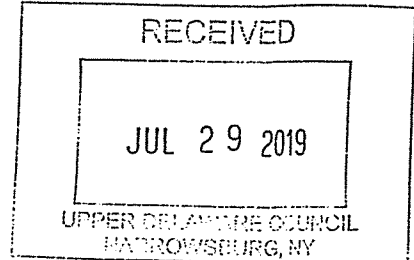
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## United States Department of the Interior

NATIONAL PARK SERVICE  
Northeast Region  
United States Custom House  
200 Chestnut Street  
Philadelphia, PA 19106-2878



IN REPLY REFER TO:

July 26, 2019

I.A.2 (UPDE-SO)  
2019-14

Ms. Susan Williams  
Senior Civil Engineer Supervisor Transportation  
PA Department of Transportation, Liaison Unit - Engineering District 4-0  
55 Keystone Industrial Park  
Dunmore, PA 18512

**Re: PENNDOT D4 Skinners Falls Project – Interstate Bridge #5**

Dear Ms. Williams:

Thank you for sending the meeting minutes from the June 18, 2019, field meeting for the Skinners Falls-Milanville Bridge, received on July 15, 2019. The purpose of this letter is to explain the National Park Service's review authority and to continue the necessary coordination with your Department.

Interstate Bridge #5 between Cochecton, NY and Milanville, PA is located on the Upper Delaware Scenic and Recreational River. In 1978, Congress designated Upper Delaware Scenic and Recreational River as both a unit of the National Park System (NPS) and a unit of the National Wild and Scenic Rivers System (Upper Delaware Act, Public Law 95-625 § 704, November 10, 1978). As a result, Upper Delaware Scenic and Recreational River is subject both to NPS management policies and to any other requirements specified in the National Wild and Scenic Rivers Act (P.L. 90-542).

The primary statutory directive for the National Park Service is provided by the NPS Organic Act of 1916 which established the purpose of the NPS "to conserve the scenery and the natural and historic objects and the wild life therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations" [The Organic Act of 1916, 16 U.S.C. § 1, (1916)]. The NPS interprets the Organic Act through the development of National Park Service Management Policies (NPS 2006) and the courts have stated that "the Park Service has broad discretion in determining which avenues best achieve the Organic Act's mandate" (*Bicycle Trails Council of Marin v. Babbitt*, 1996). In line with this broad discretion, the Organic Act provides the Park Service with the authority to make such regulations as it deems "necessary or proper for the use and management of the parks" (16 U.S.C. § 3).

Similar to the mandate of the Organic Act, the National Wild and Scenic Rivers Act of 1968 (WSRA) states that "certain selected rivers of the Nation which, with their immediate environments, possess outstandingly remarkable scenic, recreational, geologic, fish and wildlife, historic, cultural, or other similar values, shall be preserved in free-flowing condition, and that they and their immediate environments shall be protected for the benefit and enjoyment of present and future generations" [The National Wild and Scenic Rivers Act of 1968, 16 U.S.C. §§ 1271-1287, (1968)].

#### Section 7(a)

Review of this project may be required under Section 7(a) of the WSRA. The WSRA requires evaluation of the impacts of "water resources projects"<sup>1</sup> within the river's bed or banks. The authority for this evaluation is found in Section 7(a) of the Act. The determination of a proposed federally assisted water resources project's potential impacts on a river's outstandingly remarkable values, water quality, and free-flowing condition is made solely by the NPS. Through the language of this section, Congress expressed the clear intent to protect river values from the harmful effects of water resources projects. The following "outstandingly remarkable resource values" associated with the Upper Delaware Scenic and Recreational River exists in the immediate area of the proposed project: Recreational, Scenic, Cultural, Geological, and Ecological. Like all National Wild and Scenic Rivers, the Upper Delaware also possesses a free-flowing condition and exceptional water quality. The proposed repair of Bridge # 5's New York side wing wall and abutment could potentially result in impacts to fish, mussels and other wildlife; to river flows and water quality; and to geological, recreational and scenic resources.

The Act prohibits Federal agencies from assisting in the construction of any water resources project that would have a direct and adverse effect on the values of a designated river [Section 7(b)]. 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." Federal actions, including the issuance of a Section 404 permit by the Army Corps of Engineers, may not proceed unless the NPS has determined in writing that the proposed project fully meets the requirements of the WSRA:

In addition to Congressional acts dealing specifically with the National Park System and to National Wild and Scenic Rivers, many other statutes impose requirements that may affect decisions made by the National Park Service with regard to managing a National Wild and Scenic River. These statutes include the Antiquities Act (16 U.S.C. § 431), the National Environmental Policy Act (NEPA) (42 U.S.C. §§ 4321-4347), and the National Historic Preservation Act of 1966 (NHPA) (16 U.S.C. § 470 et seq.).

Based on our preliminary understanding of the project, the following additional reviews and permits may also be required:

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<sup>1</sup> A "water resources project" under section 7 of the WSRA is defined as any dam, water conduit, reservoir, powerhouse, transmission line, or other project works under the Federal Power Act (FPA), or other construction of developments which would affect the free-flowing characteristics of a wild and scenic or congressionally authorized study river (36 CFR 297.3). In addition to projects licensed by the Federal Energy Regulatory Commission (FERC), water resources projects include, but are not limited to: dams; reservoirs; water diversion projects; fisheries habitat and watershed restoration/enhancement projects; bridges and other roadway construction/reconstruction projects; bank stabilization projects; channelization projects; levee construction; recreation facilities such as boat ramps and fishing piers; and activities that require a permit from the U.S. Army Corps of Engineers pursuant to section 404 of the Clean Water Act (33 USC 1344).



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#### Section 4(f)

Section 4(f) of the Department of Transportation Act of 1966 protects publicly owned parks, recreation areas, and wildlife or waterfowl refuges of national, state, or local significance and historic sites of national, state, or local significance from use by transportation projects. Publicly owned waters of designated Wild and Scenic Rivers are protected by Section 4(f). Depending on the Section 4(f) pathway taken by the project, a determination regarding the project's Section 4(f) status could potentially require written concurrence by the National Park Service, or the park may be required to provide Section 4(f) comments.

#### State Historic Preservation Office Consultation

The bridge was added to the National Register of Historic Places in 1988 through a National Register Nomination for Highway Bridges Owned by the Commonwealth of Pennsylvania Department of Transportation; is highlighted as a rare steel truss bridge in the 1992 Multiple Property Listing of Historic and Architectural Resources of the Upper Delaware Valley; and was listed as a Contributing Resource in the Milanville Historic District National Register of Historic Places Registration Form approved in 1993.

Since the bridge is located in both Pennsylvania and New York, consultation with both the New York and Pennsylvania SHPOs is required prior to the initiation of Phase 1 of the repairs. Documentation of your consultations and the findings of both SHPOs will be required.

#### Special Use Permit

Two special use permits will be required from the National Park Service – one for each phase of the project. The park will need to provide management and oversight on this project to avoid impairment or incompatible use of the resources and values of the park, limit resource damage, minimize health and safety risks to the visiting public, prevent disruption of visitor use or conflicts, and protect agency resources. PennDOT will therefore be required to obtain a Special Use Permit from the park for construction to proceed. The National Park Service at the Upper Delaware Scenic and Recreational River allows construction when it is consistent with the protection and public enjoyment of park resources, and avoids conflict with the public's normal use and enjoyment of the park. Any special conditions and restrictions will be noted on the Special Use Permit. For this project, the permittee must have an approved Boater Safety Plan/Aids to Navigation (ATON) Plan in place prior to the commencement of construction as a condition of the permit.

#### Boater Safety Plan/Aids to Navigation Plan (ATON)

A Boater Safety Plan/ATON must be approved by the National Park Service prior to beginning work on the project, and will be considered part of the Special Use Permit issued by the NPS. To obtain NPS approval, the Boater Safety Plan/ATON must meet the guidelines established in the Upper Delaware Scenic & Recreational River "Boater Safety Plan/ATON Requirements".

#### Consistency with the River Management Plan and Land and Water Use Guidelines

In addition to the above considerations, decisions made by federal and state agencies must be consistent with the Land and Water Use Guidelines contained in the 1986 Final River Management Plan for the Upper Delaware Scenic and Recreational River. Projects involving facilities in the river corridor to be constructed or operated by governmental agencies, such as Interstate Bridge #5, are reviewed as Class II projects for substantial conformance with the Land and Water Use Guidelines. Damascus Township and the Town of Cochecton are members of the Upper Delaware Council (UDC), the organization responsible for performing reviews of Class II projects within the UDC's

member communities and making recommendations to the National Park Service. It will be necessary, therefore, to submit the design plans to the Upper Delaware Council for a substantial conformance review. Pete Golod, Resource Specialist at the Upper Delaware Council, can provide more information about plan submission requirements and the UDC's project review process. He can be reached by phone at (845) 252-3022 and by email at [Pete@upperdelawarecouncil.org](mailto:Pete@upperdelawarecouncil.org).

Thank you for providing the meeting minutes to the National Park Service. In order to fully understand the park's review responsibilities with regard to the proposed bridge project, please send detailed construction drawings and specifications when they have been completed. Please also advise whether federal money is being used to fund any aspect of the project and what other federal permits are anticipated.

If you have any questions, please call Jennifer Claster, Community & Land Use Planner, at (570) 729-7136 ext. 2230 or email [jennifer\\_claster@nps.gov](mailto:jennifer_claster@nps.gov).

Sincerely,



Marilou Ehrler  
Acting Superintendent

cc: Laurie Ramie, Executive Director, Upper Delaware Council  
Emma Diehl, Historic Building Project Reviewer, Pennsylvania State Historic Preservation Office  
Weston Davey, Technical Assistance and Compliance, New York State Division for Historic Preservation

From: Laurie Ramie <laurie@upperdelawarecouncil.org>  
Subject: RE: Upper Delaware Council Response to Skinners Falls Bridge Document  
Date: January 12, 2022 at 2:05:11 PM EST  
To: "Williams, Susan" <susawillia@state.pa.us>, "Shemo, Neil" <Neil.Shemo@aecom.com>, "hgerling@pa.gov" <hgerling@pa.gov>, "skinnerfallsbridge@aecom.com" <skinnerfallsbridge@aecom.com>, "Richard Roman (riroman@pa.gov)" <riroman@pa.gov>, "Nicolas Choubah (Nick.Choubah@dot.ny.gov)" <Nick.Choubah@dot.ny.gov>, "krthompson@pa.gov" <krthompson@pa.gov>, "Susan Hazelton (shazelton@pa.gov)" <shazelton@pa.gov>, "Cody Hendrix (cody\_hendrix@nps.gov)" <cody\_hendrix@nps.gov>, "Christine Klein (Christine.Klein@dot.ny.gov)" <Christine.Klein@dot.ny.gov>, "Joseph Salvatore (Joseph\_Salvatore@nps.gov)" <Joseph\_Salvatore@nps.gov>, "Mike Peifer (mpeifer@pahousegop.com)" <mpeifer@pahousegop.com>, "Lisa Baker (lbaker@pasen.gov)" <lbaker@pasen.gov>, "Aileen Gunther (aileen.gunther@nyassembly.gov)" <aileen.gunther@nyassembly.gov>, "Senator Mike Martucci (martucci@nysenate.gov)" <martucci@nysenate.gov>, "Camille O'Brien (obrienc@nysenate.gov)" <obrienc@nysenate.gov>, "Brian Smith (BSmith@waynecountypa.gov)" <BSmith@waynecountypa.gov>, "Freda Eisenberg (Freda.Eisenberg@sullivanny.us)" <Freda.Eisenberg@sullivanny.us>, "Craig Rickard (CRickard@waynecountypa.gov)" <CRickard@waynecountypa.gov>, "Steve Adams (stevenadams03@yahoo.com)" <stevenadams03@yahoo.com>, "Gary Maas (gmaas@townofcochectonny.org)" <gmaas@townofcochectonny.org>, "damascus@ptd.net" <damascus@ptd.net>, "Melissa Haviland (damtres1@ptd.net)" <damtres1@ptd.net>, "Maryann Oumrim (townclerk@townofcochectonny.org)" <townclerk@townofcochectonny.org>, "Robert Doherty (Robert.Doherty@sullivanny.us)" <Robert.Doherty@sullivanny.us>  
Cc: Lauren Williams <lmw@greenworksllawconsulting.com>, "Barbara Arrindell (dcs@DamascusCitizens.org)" <dcs@DamascusCitizens.org>, "nathan@historicbridges.org" <nathan@historicbridges.org>, "Hauptman, Lauren" <lauren\_hauptman@nps.gov>, "Andy Boyar (andyboyar@gmail.com)" <andyboyar@gmail.com>, "Dan Hust (Dan.Hust@sullivanny.us)" <Dan.Hust@sullivanny.us>, "Andy Boyar (andyboyar@gmail.com)" <andyboyar@gmail.com>, "Susan Sullivan (suesul1941@gmail.com)" <suesul1941@gmail.com>, "Jeff Dexter (ljdexter@ptd.net)" <ljdexter@ptd.net>, "Larry Richardson (l.richardson1068@gmail.com)" <l.richardson1068@gmail.com>

As a supplement to the Upper Delaware Council's comment letter below, we attach this illustrated booklet prepared in 2017 by the late Ed Wesely - former Milanville resident, writer, educator, and photographer - to highlight the historical and cultural context of the Milanville-Skinners Falls Bridge. Thank you.

Laurie Ramie, Executive Director  
Upper Delaware Council, Inc.  
P.O. Box 192, 211 Bridge St.  
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From: Laurie Ramie  
Sent: Thursday, January 06, 2022 9:56 PM  
Subject: Upper Delaware Council Response to Skinners Falls Bridge Document

*Text copy of attached, formal letter approved by the UDC on this date:*

January 6, 2022

Susan Williams, Project Manager, Senior Civil Engineer Supervisor Transportation  
Pennsylvania Department of Transportation  
Engineering District 4-0 Liaison Unit  
55 Keystone Industrial Park  
Dunmore, PA 18512-1516

**RE: Skinners Falls, NY-Milanville, PA Bridge Draft Purpose and Need Document**

Dear Ms. Williams,

The Upper Delaware Council (UDC) expresses disappointment in the draft Purpose and Need Statement that PennDOT released on Dec. 8, 2021 with comments due by Jan. 8, 2022, which we find to be subjectively skewed against rehabilitation of the existing 1902 bridge through faulty assumptions and glaring omissions.

The Purpose and Need document's intent is to establish a rationale for the proposed transportation improvement project and outline the facts that justify it. As stated on your comment form, it "will drive the process for alternatives consideration, inform the environmental analysis and support the alternative selection process." Therefore, its contents and tone will play a critical role in decision-making over the fate of the Skinners Falls-Milanville Bridge that has been indefinitely closed to all usage since October 16, 2019.

Our first complaint is with the one-sentence draft **Purpose**, which reads: "The purpose of this project is to provide a safe and efficient crossing of the Delaware River at Skinners Falls for cars, trucks, emergency response vehicles, bicyclists, and pedestrians."

It is highly presumptuous to include "emergency response vehicles" as a definitive Purpose component. The document later states that local emergency response vehicles weigh in the range of 15-31 tons for certain fire trucks. Considering that the single-lane bridge was constructed with a 9-ton weight limit, reduced to a 7-ton posting in 2007 and further downgraded to 4 tons in 2013, declaring that category of vehicle as a required use appears to set an unachievable standard of inadequacy for the bridge's restoration to its original capacity from the very first sentence. However, note that when this project's Planning and Environmental Linkages (PEL) public survey asked the question, "*Beyond your personal usage, what types of vehicles/users need to have access to the bridge to meet local needs?*", respondents prioritized: 1. Personal cars or trucks; 2. Pedestrians; 3. Bicycles; 4. Ambulances; and 5. Small Delivery Vehicles. The three types of usage least selected were: 6. Recreational Vehicles/Boat Trailers; 7. Large Trucks/Fire Trucks/Tractor Trailers; and 8. Buses. Clearly not every possible use of this bridge is deemed appropriate or necessary for this location served by weight-posted roads. Emergency responders in the Upper Delaware River Valley have made reasonable accommodations over the bridge's 118-year existence to use modern two-lane concrete alternatives at short distances away in Narrowsburg and Cochecton rather than this 13-foot-wide, timber plank deck crossing.

The draft document offers these three **Needs** statements:

1. The Skinners Falls Bridge is currently closed to traffic due to its condition, which limits efficient access for residents, businesses, and recreational users.
2. Emergency response is negatively affected by the absence of a functional bridge in the vicinity of Skinners Falls.
3. The Skinners Falls Bridge does not provide adequate accommodations for pedestrians, bicyclists, and recreational users in the area.

It states that all public feedback received via the March 30, 2021 virtual public meeting attended by 143 people, the survey conducted from March 31-June 1 with 286 respondents, and the unknown number of project hotline calls, email messages, and comment letters was incorporated into the development of these Needs, yet no comprehensive summary document has been offered for review. Instead, each of the draft Needs is elaborated on with cherry-picked information to support them.

The Purpose and Need document does not indicate that the highest number of recurring themes expressed by the public were: "restore/rehabilitate the bridge" (104); "bridge is a historic resource" (78); "river crossing required at this location" (66); and "quality of life; aesthetics of the area" (63). Its traffic calming effect from the absence of large trucks, and the bridge's value for recreation and tourism were also strongly supported.

The document merely acknowledges in one paragraph of the Introduction/Background section that “The Skinners Falls Bridge has cultural significance to the local community and larger historic preservation community.” It references the bridge’s listing on the National Register of Historic Places, its location within the Upper Delaware Scenic and Recreational River – which it incorrectly states was designated as a unit of the National Park Service in 1968 (correct date is 1978) – and that the NPS cites this bridge as a contributing element to the Upper Delaware’s Cultural Outstandingly Remarkable Values.

Given the rare existence of pin-connected Baltimore truss bridges today, its qualification for state and national historic recognition, the story it tells, the visitors it attracts, the uniqueness of its ornamentation, and its perfect fit into the rural setting, we feel that the historical and cultural significance of the Skinners Falls-Milanville Bridge rises to the level of a Need for protection.

The document states that traffic counts have consistently identified vehicles in excess of the posted weight limit crossing the bridge despite the “headache” bars installed in 2016 to restrict vehicles over 8.5 feet tall. It indicates, “Regular usage of the bridge by overweight vehicles demonstrates a need to provide a crossing that is suitable for vehicles over ten tons.”

It is patently absurd to conclude that this illegal activity in any way warrants a redesign of the bridge. Instead of conceding to bad behavior, the problem must be addressed through other means such as increased enforcement and camera surveillance. That statement again appears to influence against the concept of historic rehabilitation, yet we remind you that a 2014 PennDOT feasibility study before this PEL Study had recommended full rehabilitation of the bridge to 10-tons.

While we absolutely agree that the Skinners Falls-Milanville Bridge is important to the local economy, we disagree that commerce would suffer any negative impacts by keeping the bridge “as is” since no major industry currently relies on crossing it. To the contrary, the picturesque historic bridge is a special added amenity for the campground, livery businesses, general store, gas station, and Bed and Breakfast inn that operate in the immediate vicinity.

Regarding emergency services, the National Park Service (NPS) is acknowledged as the primary responder for river rescues and its vehicles fit within the 9-10 ton weight postings. Ambulances average 5-7 tons. Most firefighters in this area respond directly to the scenes of emergencies using their personal vehicles. In discussing the Narrowsburg Fire Department’s occasional mutual aid service to the Milanville vicinity, the document states, “The restricted bridge crossing at Skinners Falls forces NFD to utilize River Road, which has narrow lanes, tight curves, and poor sight distance, as their primary response route to Pennsylvania for full-weight trucks...”. We point out that the 10-ton posted River Road would still have the same travel challenges if the Skinners Falls Bridge consisted of a new 40-ton structure. While the speed of a response is obviously important, so too is the safety of the individuals in the vehicles. If this crossing was considered that critical for emergency response, it presumably would have been targeted for immediate reopening or replacement by the NY-PA Joint Interstate Bridge Commission.

Lastly, the Purpose and Need document states that “The Skinners Falls Bridge, in its current condition, does not provide access across the river for recreational vehicles and trailers for recreational boating, fishing, camping, and shopping.” The previously referenced survey results debunk the idea that this is considered to be an issue that needs fixing. It states, “Additionally, the bridge, when open to traffic, did not provide adequate bike and pedestrian accommodations.” The term “adequate” is not defined. As a single-lane bridge with timber running boards, it’s true that there is no sidewalk or designated bike lane; however, there is easy sight distance for the 466.9-foot length of the bridge and clearance to move out of the way of the one oncoming vehicle able to cross at any given time. Therefore, we regard this as potentially prejudicial and a non-issue.

As a member of the Skinners Falls-Milanville Bridge Project Advisory Committee and a Section 106 Consulting Party, the UDC reiterates its opposition to any alternative to eliminate this crossing or to replace it with a standard-issue new bridge. We understand this rare design to be one of only three such truss types among 135 highway bridges owned by PennDOT that has not been demolished as of 2019. “Minimization and mitigation of cultural and environmental impacts” such as erecting a plaque to memorialize this historic bridge would pale in comparison to the opportunity to save this treasured historic gem that we believe adequately fulfills the transportation needs of the people and places that it serves.

The draft Purpose and Need Statement must objectively reflect the true will of public input and information gathered from the study.

Sincerely,

Andrew Boyar,  
UDC Chairperson

Cc: Neil Shemo, Project Manager, AECOM  
Richard Roman, PennDOT Transportation District 4 Executive  
Nicolas Choubah, NYS DOT Region 9 Regional Director  
Susan Hazelton, PennDOT Assistant District Executive for Design  
Heather Gerling, PennDOT Architectural Historian, Bureau of Design and Delivery  
Christine Klein, NYS DOT Regional Planning Office Local Programs Liaison  
Joe Canfield, Steve Adams, Dan Rutledge, Damascus Township Board of Supervisors  
Gary Maas, Town of Cochection Supervisor  
Brian Smith, Wayne County Commissioners Chairman  
Robert Doherty, Sullivan County Legislature Chairman, District 1  
Craig Rickard, Wayne County Planning Department Director  
Freda Eisenberg, Sullivan County Commissioner of Planning and Community Development  
PA Senator Lisa Baker, 20<sup>th</sup> District  
NYS Senator Mike Martucci, 42<sup>nd</sup> District  
PA Representative Mike Peifer, 139<sup>th</sup> District  
NYS Assemblywoman Aileen Gunther, 100<sup>th</sup> District  
Joseph Salvatore, NPS Upper Delaware Scenic and Recreational River Superintendent  
Cody Hendrix, NPS UDSRR Community and Land Use Planner

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## Skinnners Falls Bridge - Joint Position Statement

The Skinnners Falls, NY-Milanville, PA Bridge (“Bridge”) is also known as the Milanville or Black Horse Bridge and is identified by the Pennsylvania Department of Transportation (PennDOT) as BMS #63-1002-0230-0739. It crosses the Delaware River from Damascus Township, Wayne County, to the Town of Cochection, Sullivan County, joining State Route 1002 (Calkins Road) in PA with Skinnners Falls West Road in NY. The Bridge, jointly owned by New York and Pennsylvania, has been closed indefinitely following an October 16, 2019 emergency safety inspection as an evaluation of its condition is being made by PennDOT, which has lead responsibility for Bridge #5 as it is designated under the authority of the New York-Pennsylvania Joint Interstate Bridge Commission. The undersigned entities offer the following observations and recommendations for consideration by PennDOT as it develops a plan of action for the bridge:

1. **Emergency Response Usage.** The Bridge serves an invaluable role as a safety connection between the states, as a consequence of its Skinnners Falls location, which is a major tourist attraction for Delaware River users. The Damascus Ambulance Corps, Lake Huntington Fire Company and Lava Fire Department and the National Park Service are examples of first responders who need a river crossing at this location to do rescues and provide emergency services backup support. River rescues, in fact, typically take place on the New York State side but the safest area from which to life flight victims to medical facilities is on the Pennsylvania side.

As an example, a March 3, 2016 letter from the National Park Service Superintendent Kristina Heister, in response to an emergency closure at that time noted the following:

*“The closing... requires NPS law enforcement personnel, when responding to emergency calls, to travel to either the bridge in Damascus, PA or Narrowsburg, NY to access NY Route 97 which is the fastest route to travel for emergency purposes. The estimated time to reach NY Route 97 from the Milanville Ranger Office using the Skinnners Falls Bridge is 3 minutes. The response times to reach NY Route 97 via the bridges in Damascus, PA or Narrowsburg, NY range from 6 to 14 minutes respectively. These estimates are considered a minimum due to the additional need to travel at lower speeds along River Road (a very narrow and winding road) when pulling a power boat and trailer. Travel during inclement weather or during periods of high traffic volume will also increase response times.” ... “Over the last five years, NPS Rangers have responded to 117 search and rescue and emergency medical calls on or along the river. Emergency response boats were required in 48 of these incidents.”*

The Upper Delaware Council (UDC) also said the following in a separate March 3, 2016 letter about emergency response:

*“...Emergencies have no respect for political boundaries, even if it is across a river. The first response for fire service along the Pennsylvania side comes from New York State. Even though fire trucks may not cross the bridge, most volunteers report directly to the scene from home or work, responses that are now delayed.”*

## Skinnners Falls Bridge - Joint Position Statement

2. **Economic Importance.** The Bridge is extremely important to local commerce, which includes, for example, Lander's River Trips on the New York side and the Milanville General Store (circa 1850) on the Pennsylvania side and is part of the 14-structures Milanville Historic District along with the bridge also listed on the National Register. The former includes canoe and tube rentals plus 104 campsites located within walking distance of Skinnners Falls, which is described as "a magnet for tubing enthusiasts and launch site for canoers and rafters."

The National Park Service also manages an access on the New York side but its Milanville office, from which it services the vicinity, is on the Pennsylvania side. The current closure of the Bridge (and recent earlier closures) has had a very negative impact on the ability to do business, especially given the importance of river-related tourism to the area. PennDOT cites average daily traffic count of 325 vehicles that used the bridge recently (it was 400 vehicles prior to the weight limits).

Another excerpt from the above referenced UDC letter offers the following:

*"...There is currently an online petition drive underway that speaks to this closure's adverse impacts that will be exacerbated the longer it continues. Although the Skinnners Falls Bridge has been restricted from heavy loads for decades, it still sees its share of commercial and residential traffic in terms of people going to work, light service trucks, shopping, day care, church, and supporting the local tourism trade."*

3. **Historical Value.** The Bridge is of much historical and exceptional scenic significance. It has what has been described as "an airy quality" that meshes beautifully with the character of the river valley in this location. Built and reconstructed between 1901-04, it is historically and technologically significant. It is "an extremely rare example of a multi-span pin-connected Baltimore truss bridge." The bridge, in fact, is among the oldest known still existing bridges associated with the American Bridge Company and is the oldest example of its Baltimore Truss Bridge still in use in the United States. The Company was formed by J.P. Morgan and Company through a merger of 28 companies and a year later became a subsidiary of US Steel Company. It is still in operation and is known for its involvement in the construction of notable bridges and buildings such as the Verrazano Bridge, the Chesapeake Bay Bridge and Tunnel, the San Francisco-Oakland Bay Bridge, the Woolworth Building, Chrysler Building, Empire State Building and Rockefeller Center.

The Bridge incorporates several outstanding remarkable features that caused it to be listed on the National Register of Historic Places in 1988. According to the 1988 National Register Nomination the bridge is significant for its engineering and design as an intact example of a "Baltimore truss of moderate length...one of only three representative examples of this type of truss included in this nomination [of 135 highway bridge owned by PennDOT and as of 2019 the only one of the three that has not been demolished]."

## Skinnners Falls Bridge - Joint Position Statement

The Bridge is also highlighted as one of two rare steel truss bridges in the 1992 Multiple Property National Register Listing for the "Historic and Architectural Resources of the Upper Delaware Valley, New York and Pennsylvania." The second bridge was the 1902 Pond Eddy Bridge, which has since been demolished and replaced, leaving the Skinnners Falls-Milanville Bridge as the only remaining example in this region.

Finally, the Bridge is also listed on the National Register for the third time as a contributing resource in the Milanville Historic District, which was added to the National Register in 1993 for "its significant contribution to nineteenth and early twentieth century industrial development of the area."

Preserving these defining features to the extent practicable during another rehabilitation or the incorporating of aspects of these features into any replacement would be important to securing necessary approvals for any major work.

4. **Roadway Connections.** The Bridge is an integral connection to Route 97 on the New York side of the river (designated as the Upper Delaware Scenic Byway), which is the key north-south route through the valley and the only one capable of safely handling significant volumes of two-way traffic. Without availability of the bridge as a connection to Route 97, Pennsylvania residents are forced to use narrow, winding and often unsafe River Road segments to Damascus or Darbytown to reach locations such as Callicoon and Narrowsburg. There has been a minimum of four significant accidents in just the last five years, in fact. River Road between Milanville and Damascus, in fact, was recently closed due to serious slope failure issues forcing Milanville residents to use River Road or other alternatives not equipped to safely handle additional traffic.

A review of traffic data prior to earlier closures suggests approximately 80-100 additional vehicles per day were forced onto these roads by lowered weight limits and now this has been increased to roughly 400 vehicles that must use much less safe alternative routes.

5. **Future Options.** The Bridge has been repaired several times in recent years with only short-term benefits and significantly reduced weight limits that need to be raised. Short-term repairs do not appear to be an appropriate strategy for addressing the above needs. Likewise, removal of the bridge would simply exacerbate the existing problems. Rehabilitation or replacement are, therefore, the only realistic options going forward.

Should rehabilitation prove to be more feasible it should address weight limits so as to increase the functionality of the Bridge. It should be capable of accommodating all emergency vehicles, including fire trucks. Should replacement prove to be more feasible it should be accomplished in a manner that incorporates major outstanding remarkable features into the new design while also increasing Bridge capacity. The goal should be to craft the safest, most economically effective and historically sensitive long-term solution; balancing these factors to the exclusion of none.

## Skinnners Falls Bridge - Joint Position Statement

6. **Our Recommendations.** The undersigned entities are willing to serve as a steering committee for purpose of providing public input with regard to a Bridge solution and offer the following initial recommendations:
- (a) Engineering expertise will be needed to evaluate the Bridge condition and make recommendations that align with the PennDOT Preservation Assessment of the Bridge. It is suggested that the same firm also be engaged in designing the solution so as to avoid the necessity of another time-consuming solicitation of professional services. Given the historic importance of the bridge, it is suggested that if PennDOT cannot fund an evaluation and recommendations for the bridge, that alternative sources of private and/or public funding should be sought. The NPF and NPCA are suggested potential starting points. If rehabilitation is the selected solution, these sources may also be appropriate for funding the rehabilitation work.
  - (b) Due to the next annual meeting of the NY-PA Interstate Bridge Commission being held in May, 2020, it is suggested all planning be geared toward presenting a definitive recommendation for a solution at that meeting, so as to advance the project as quickly as possible.
  - (c) This bridge is considered by the National Park Service (NPS) as a contributing element to the Cultural Outstandingly Remarkable Value for Upper Delaware Scenic and Recreational River. Outstandingly Remarkable Values (ORV) are defined under the National Wild and Scenic Rivers Act as those of the characteristics that make a river worthy of special protection. ORVs must be river-related or dependent must be rare, unique, or exemplary at a comparative regional or national scale. This project will necessitate review under Section 7 of the National Wild and Scenic Rivers Act. Should federal funding or permits be involved early and frequent communication with the NPS in the design and engineering process is appropriate.

Respectfully submitted this 4th day of March, 2020 by the following:

Damascus Township Supervisors  
Joseph Canfield, Chairman  
Daniel Rutledge, Vice-Chairman  
Steven R. Adams, Supervisor

Upper Delaware Council (UDC)  
Laurie Ramie

Chamber of the Northern Poconos  
Holly Przasnyski

Upper Delaware National Park Service  
Jessica Weinman

Town of Cochection  
Gary Maas, Supervisor

Lake Huntington Fire Dept.  
Mike Pomes

Upper Delaware Scenic Byway Committee  
Glenn Pontier, Chairman  
Town of Highland Representative

Wayne County Planning Commission  
William Troop, Chairman



# Skidders Falls Bridge - Joint Position Statement

From: JOHN ZIMMERMAN <[zimmermanjj@verizon.net](mailto:zimmermanjj@verizon.net)>

Subject: Skinners Fall Project Letter

Date: June 1, 2021 at 8:17:19 PM EDT

Here is the letter sent via email and U.S. Mail to Susan Williams at Penn Dot

## Zimmerman & Associates

June 1, 2021

Ms. Susan Williams  
Senior Civil Engineer Supervisor Civil  
PA Department of Transportation Liaison Unit  
55 Keystone Industrial Park  
Dunmore, PA 18512

### **Re: PennDOT D4 Skinners Falls Project-Interstate Bridge #5**

Dear Ms. Williams:

Pursuant to the federal Freedom of information Act (FOIA), the New York Right to Know Act and the Pennsylvania Right to Know Act, Damascus Citizens for Sustainability (DCS) hereby requests copies of all documents that include any information related to the Skinners Falls Bridge and consideration of projects to repair or replace the bridge and related infrastructure. This bridge is listed on the National Register of Historic Places and is protected by this listing. The Skinners Falls Bridge is also the center piece of the Milanville historic district which is also listed on the National Register of historic places. Both the bridge and nearly two dozen other structures on both sides of the Delaware River are protected by the listing under the National Trust for Historic Preservation.

This letter is written to support DCS's comments and request an extension of the review period by at least six months to allow for a through environmental review of the PennDOT proposal. The environmental review must include three environmental protection programs: the National Environmental Policy Act (NEPA); the Section 106 Program under the National Historic Preservation Act;

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[zimmermanjj@verizon.net](mailto:zimmermanjj@verizon.net)

13508 Maidstone Lane, Potomac, MD 20854

## **Re: PennDOT D4 Skinners Falls Project-Interstate Bridge #5**

and the Section 4(f) Program of the Department of Transportation. Compliance with these three programs will require at least six months.

Section 4(f) of the DOT Act of 1966, requires the Secretary of Transportation to conduct a detailed and complete evaluation that demonstrates that any project that may impact an historic property listed on the National Register will have no more than a de minimis impact on property listed on the National Register.

In addition to review under Section 4(f), any proposed project must also be reviewed under the National Environmental Policy Act (NEPA). NEPA review includes preparation of an environmental assessment (EA) or an environmental impact statement (EIS) for the federal agency undertaking the relevant project. See *Calvert Cliffs Coordinating Committee v. Atomic Energy Commission* 449F2nd 1109 (D.C. Cir.1971), cert. denied 404U.S. 942(1972).

In this case, the New York State Environmental Quality Review Act (SEQRA) also applies to any proposed project and requires preparation of an EA or EIS in accordance with SEQRA. In such cases, the relevant federal and state agencies must conduct a scoping process to select a lead agency for preparation of the environmental assessment documents. To date, there has been nothing even remotely resembling a review of potential environmental impacts.

New York and Pennsylvania share joint ownership of the Skinners Falls Bridge. The bridge is located on a portion of the river where there is considerable recreational use and emergency response uses, as documented in a letter from the superintendent of the National Park Service to you dated March 3, 2016. The NPS has the responsibility to manage the bridge and associated facilities of the Skinner Falls Bridge. The Park Service and several interested parties, including DCS, township members and township supervisors from most of the townships adjacent to the river, have come together to urge in a joint position paper that

**Re: PennDOT D4 Skinners Falls Project-Interstate Bridge #5**

the Skinners Falls Bridge be restored rather than replaced. DCS supports the joint position statement.

There is another important aspect of the regulatory structure that applies to the Skinner Falls Bridge and the Milanville historic district. Section 4(f) (49 U.S. section 303) applies special protection to historic sites listed on the National Register of Historic Places. Section 4(f) provides that a project can only be approved by the Secretary if the activity will have no more than a de minimis impact on the resource at issue. Destruction of the Skinners Falls Bride is clearly not a de minimis impact.

John J. Zimmerman

Counsel

Damascus Citizens for Sustainability



# Upper Delaware Council

P.O. Box 192, 211 Bridge Street, Narrowsburg, New York 12764-0192 • (Tel.) 845-252-3022 • (Fax) 845-252-3359

[www.upperdelawarecouncil.org](http://www.upperdelawarecouncil.org)

April 22, 2021

Susan Williams, Project Manager, Senior Civil Engineer Supervisor Transportation  
Pennsylvania Department of Transportation  
Engineering District 4-0 Liaison Unit  
55 Keystone Industrial Park  
Dunmore, PA 18512-1516

**RE: Skinners Falls, NY-Milanville, PA Bridge PEL Comments due by April 30, 2021**

Dear Ms. Williams,

The Upper Delaware Council, Inc. (UDC), whose 13 towns and townships, the Commonwealth of Pennsylvania, and the State of New York as voting members work in partnership with the National Park Service to conserve the 1978 federally-designated Upper Delaware Scenic and Recreational River, offers these comments in response to the Planning and Environmental Linkages (PEL) Study underway for the Skinners Falls, NY-Milanville, PA Bridge.

- 1) The UDC has consistently supported preserving Interstate Bridge #5 by maintaining the crossing that has existed for 119 years and rehabilitating it to the original nine-ton weight limit or highest posting that can be practically achieved without compromising the historic elements that give the bridge its unique character.
- 2) The 466.9-foot-long, two-span structure with a 13-foot-wide timber deck, built in 1902 by the American Bridge Co., fits perfectly into its rural setting, helps define the Upper Delaware Scenic and Recreational River's Outstandingly Remarkable Values in the cultural category, and serves as a treasured, picturesque attraction for this special region's nearly 250,000 annual visitors and our local residents alike.
- 3) The pin-connected Baltimore through truss design is historically and technologically significant, earning a November 14, 1988 designation to the National Register of Historic Places as one of only three such truss types among 135 highway bridges owned by PennDOT that had not been demolished as of 2019. The bridge is also featured on the "Historic and Architectural Resources of the Upper Delaware River Valley: New York and Pennsylvania" 1992 Multiple Property National Register listing for its rare truss style along with the original 1904 Pond Eddy Bridge, before that structure was torn down following a 20-year controversial debate and replaced with a two-lane, concrete bridge in 2018. In 1993, the Milanville Historic District was added to the Register in recognition of the area's 19<sup>th</sup> and early 20<sup>th</sup> century industrial development and noteworthy architecture which prominently includes the bridge among its 14 contributing structures.
- 4) A 2014 PennDOT feasibility study considering the same current alternatives for the Skinners Falls-Milanville Bridge recommended its full rehabilitation to a 10-ton weight

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***Working together to conserve the Upper Delaware Scenic and Recreational River***

*Town of Hancock - Town of Fremont - Town of Delaware - Town of Cochecton - Town of Tusten - Town of Highland  
Town of Lumberland - Town of Deerpark - Damascus Township - Berlin Township - Lackawaxen Township - Shohola Township - Westfall Township  
State of New York - Commonwealth of Pennsylvania - Delaware River Basin Commission - In partnership with the National Park Service*

limit. A precedent for the NY-PA Joint Interstate Bridge Commission supporting the preservation of a single-lane Upper Delaware River crossing is found upstream at the Kellams, NY-Stalker, PA Bridge, originally built in 1890 with major rehabilitations occurring in 1990 and 2018. The 384-foot suspension bridge serves a similar traffic count of approximately 300 vehicles per day, is suitable for its rural location, and carries an 11-ton limit.

- 5) A 9 or 10-ton posted Skinners Falls Bridge would adequately fulfill the transportation needs of its communities in the Town of Cocheton, NY and Damascus Township, PA. Standard cars (1.5 tons), personal trucks (3 tons), ambulances (5-7 tons), and delivery trucks (6-8 tons) could all be accommodated. The types of vehicles that could not - such as buses, fire trucks, and tractor trailers - are not appropriate or necessary given that there are alternative crossings offered at short distances away in Narrowsburg and Cocheton via NYS Route 97, most firefighters here respond directly to emergency scenes in their personal vehicles, and there is no major commercial industry to travel to on either side.
- 6) Installing a two-lane, 40-ton modern bridge would require negotiations to acquire additional property or taking of land by eminent domain. Even so, the new bridge would lead to River Road in Milanville which is weight posted for 10 tons, characterized by narrow, twisty lanes, has been subjected to slope failures, and the approach lacks a proper turning radius for larger vehicles. Those conditions render the intent nonsensical. The required upgrade of the connecting road would add an astronomical cost to the project.
- 7) The activities associated with the bridge's use meld with our countryside daily living and recreational pursuits that are disrupted by its closure, such as people crossing it for work, shopping, day care, church, scenic drives, and visits to the circa 1850 Milanville General Store, the National Park Service Milanville Ranger Office, the NYS DEC Skinners Falls River Access, Lander's River Trips Skinners Falls Campground, and Lou's Tubes. Numerous petition drives and the March 30 virtual public meeting attended by an impressive turnout of nearly 150 spoke to the importance of this bridge in their lives and the adverse impacts of its closure, most recently ongoing since October 16, 2019.
- 8) Given that PennDOT has estimated a two-year timeframe to secure environmental and permitting clearances before any construction could occur at this site, the UDC requests consideration of improving the aesthetic appearance of the barricades to traffic and pedestrians. Those currently consist of large dirt piles that create mud, orange barrels, and a proliferation of standard metal signs. We propose installing temporary wooden gates and more attractive signage to relay those messages within this designated national park unit vicinity, with the goal of reducing the visual blight of this bridge that is beloved by photographers, artists, boaters passing under it, and people viewing it from either side.

Please note that the Final 1986 *River Management Plan for the Upper Delaware Scenic and Recreational River: New York and Pennsylvania* stipulates that facilities in the river corridor to be constructed or operated by government agencies must be reviewed by the UDC as Class II development projects for their substantial conformance with the Land and Water Use Guidelines under the terms of our Cooperative Agreement with the National Park Service. The UDC also seeks to participate as a consulting party for the required Section 106 review under the National Historic Preservation Act. Additionally, the National Park Service will evaluate the project's impacts under Section 7 of the National Wild and Scenic Rivers Act.

In conclusion, while we recognize the need to invest dollars wisely for construction and long-term maintenance expenses, the UDC believes that tearing down the iconic Skinners Falls-Milanville Bridge in favor of replacing it with an unremarkable and unnecessary modern bridge would create new and potentially more consequential problems, while permanently destroying the historical and cultural value it offers to the Upper Delaware River Valley.

We urge working with the engaged community of bridge rehabilitation proponents to seek public and private historic preservation funding sources as needed to supplement the FHWA aid. The Skinners Falls-Milanville Bridge is worth saving.

Sincerely,



Jeffrey R. Dexter,  
UDC Chairperson

Cc: Neil Shemo, AECOM Project Manager  
Marian Hull, AECOM Public Involvement  
Richard Roman, PennDOT Transportation District 4 Executive  
Nicolas Choubah, NYS DOT Region 9 Regional Director  
Susan Hazelton, PennDOT Assistant District Executive for Design  
Christine Klein, NYS DOT Regional Planning Office Local Programs Liaison  
Joe Canfield, Steve Adams, Dan Rutledge, Damascus Township Board of Supervisors  
Gary Maas, Town of Cochection Supervisor  
Brian Smith, Wayne County Commissioners Chairman  
Robert Doherty, Sullivan County Legislature Chairman, District 1  
Craig Rickard, Wayne County Planning Department Director  
Freda Eisenberg, Sullivan County Commissioner of Planning and Community Development  
PA Senator Lisa Baker, 20<sup>th</sup> District  
NYS Senator Mike Martucci, 42<sup>nd</sup> District  
PA Representative Mike Peifer, 139<sup>th</sup> District  
NYS Assemblywoman Aileen Gunther, 100<sup>th</sup> District  
Joseph Salvatore, NPS Upper Delaware Scenic and Recreational River Superintendent  
Cody Hendrix, NPS UDSRR Community and Land Use Planner



# Upper Delaware Scenic Byway

P.O. Box 127. Narrowsburg, NY 12764

April 26, 2021

Susan Williams, Project Manager  
Pennsylvania Department of Transportation  
55 Keystone Industrial Park  
Dunmore, PA 18512-1516  
Via [skinersfallsbridge@aecom.com](mailto:skinersfallsbridge@aecom.com)

Dear Ms. Williams,

The Upper Delaware Scenic Byway, Inc. (UDSB) Committee expresses our organization's steadfast support for the preservation and restoration of the 1902 Milanville, PA-Skinners Falls, NY Bridge as PennDOT studies whether to repair, replace, or eliminate this historic crossing that is located a short distance off New York State Route 97 in our member Town of Cohecton.

Replacing this architecturally unique and airy bridge featuring its single-lane, wood plank deck with an indistinctive, 40-ton concrete structure would forever change for the worse the quaint character of the bi-state communities that the bridge connects. Its well-deserved 1988 listing on the National Register of Historic Places should be honored and respected.

The 2002 UDSB Enhancement Concept corridor management plan recognizes this bridge as a special part of the river valley's cultural story: "Listed on the NRHP, this is a two-span, single-lane iron bridge with a single mortared stone pier. Its construction is a variation of a Baltimore (Petit) through truss. It was built in 1902 by the American Bridge Company for the Milanville Bridge Company and linked the industrial and commercial center of Milanville with the New York and Erie Railroad. Its construction spurred a minor development at Skinner's Falls with the construction of a station and creamery. It was a toll bridge from 1902 to 1928."

This one-of-a-kind bridge stands testament to our historic and aesthetic values. It is also perfectly adequate in size and scope for the setting it serves, including small businesses, attractions, and visitors that are economic drivers for the regional tourism industry that we promote.

The Upper Delaware Scenic Byway urges the rehabilitation and reopening of the Skinners Falls-Milanville Bridge.

Sincerely,

John Pizzolato, Chairperson  
[info@upperdelaware scenicbyway.org](mailto:info@upperdelaware scenicbyway.org)