



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

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 19th and early 20th 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

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, 20th District
NYS Senator Mike Martucci, 42nd District
PA Representative Mike Peifer, 139th District
NYS Assemblywoman Aileen Gunther, 100th District
Joseph Salvatore, NPS Upper Delaware Scenic and Recreational River Superintendent
Cody Hendrix, NPS UDSRR Community and Land Use Planner