

# 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', with a long, sweeping flourish extending to the right.

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

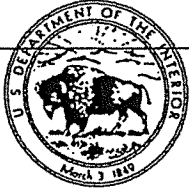
May 31, 2021 Letter from National Park Service (NPS Upper Delaware Scenic and Recreational River)

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)

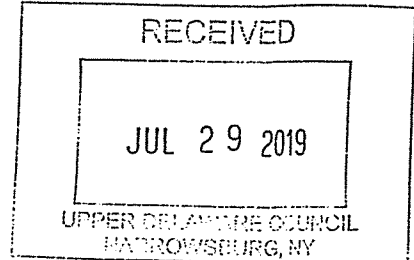
Joseph Salvatore, National Park Service - Upper Delaware Scenic and  
Recreational River, [joseph\\_salvatore@nps.gov](mailto:joseph_salvatore@nps.gov)

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 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



# 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 Cochecton.

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.

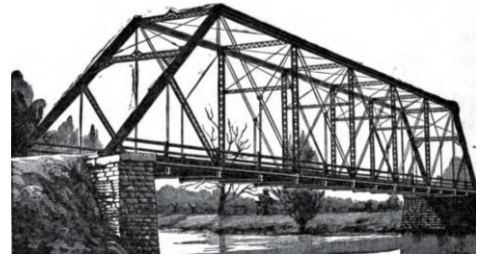
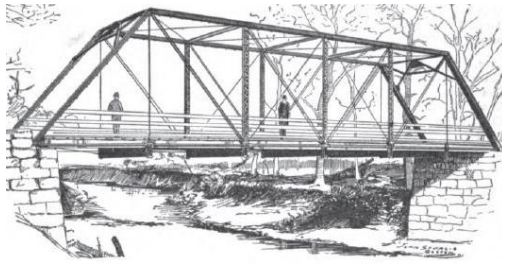
The 2002 UDSB Enhancement Concept corridor management plan recognizes this bridge as a special part of the river valley's cultural story: "Listed on the NRHP, this is a two-span, single-lane iron bridge with a single mortared stone pier. Its construction is a variation of a Baltimore (Petit) through 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)



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

Bach Ornamental and Structural Steel Inc.

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Website: www.bachsteel.com

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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.



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



IN REPLY REFER TO:

To whom it may concern:

The National Park Service (NPS), Upper Delaware Scenic and Recreational River, would like to express its support for the repair and rehabilitation of the Skinners Falls-Milanville Bridge that will preserve the historic significance and integrity of the bridge while addressing safety concerns and improved access for vehicles and pedestrians.

The Mission of the National Park Service is to preserve unimpaired the natural and cultural resources and values of the national park system for the enjoyment, education, and inspiration of this and future generations. In 1978, Congress designated 73.4 miles of the Upper Delaware River as a part of the National Wild and Scenic Rivers System as a unit of the national park system. The Upper Delaware Scenic and Recreational River protects, conserves, and enhances the free-flowing character, exceptionally high water quality, and the scenic, recreational, ecological, cultural, and geological values of the Upper Delaware River valley through collaborative partnerships and cooperation with state and local government entities.

The Skinners Falls-Milanville Bridge was completed in 1902 and is an element that supports two of the Outstandingly Remarkable Values (ORV), Cultural and Scenic, for which the Upper Delaware Scenic and Recreational River is worthy of special protection under the Wild and Scenic Rivers Act. ORVs must be river related or dependent and they must be rare, unique, or exemplary at a comparative regional or national scale.

Recently re-evaluated and listed as a contributing element of the Cultural Resource ORV, the Skinners Falls-Milanville Bridge is 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

**INTERIOR REGION 1 • NORTH ATLANTIC-APPALACHIAN**

CONNECTICUT, DELAWARE, DISTRICT OF COLUMBIA, KENTUCKY, MAINE, MARYLAND, MASSACHUSETTS, NEW HAMPSHIRE, NEW JERSEY, NEW YORK, PENNSYLVANIA, RHODE ISLAND, VERMONT, VIRGINIA, WEST VIRGINIA



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.

**Retention of this historic bridge not only preserves and supports the Outstandingly Remarkable Values of the river valley, but also provides a unique economic opportunity to support heritage tourism in the valley.**

As described in *The Upper Delaware River, A Wild and Scenic River Study*, US Bureau of Outdoor Recreation, 1973, the outstandingly remarkable cultural (historic) values for which the Upper Delaware Scenic and Recreational River are worth of protection were described as follows:

“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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<sup>1</sup> *Bridges over the Delaware River: A History of Crossings*, Frank T. Dale, 2003 pages 190-196.

According to the 2018, National Parks Conservation Association report, *Making Connections: Roots of Prosperity in New York and Pennsylvania's Upper Delaware River Region*, "Traditional industries like timber and wood products manufacturing and agriculture play a small part in the area's [current] economy, yet are essential to its character. They exert a powerful influence on the area's natural beauty and rural feel. Most community and business leaders interviewed for this report believe these traditional backbones of the region's identity will be part of its future."

"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>
2. The primary motivations of travel have shifted – again, according to Colleen Dilenschneider, the two biggest changes are in the decline in visiting friends and family and the rise in a desire for a change in scenery. It should also be noted that the desire to visit outdoor spaces such as the beach or a park and visiting historic locations and museums is increasing.<sup>5</sup>
3. Authentic places are important to understanding history and culture – In order to value the present, we must understand our past.
4. Tourism can have big economic impacts – In 2019, there were over 215,000 to the Upper Delaware with an economic output of over \$11,000,000 with 88% of visitor spending made by non-local visitors.<sup>6</sup>

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.
2. Properties within local historic districts appreciate at rates greater than the local market overall as well as faster than similar, non-designated neighborhoods.
3. Local districts encourage better quality design.
4. Local districts help the environment.
5. Local districts are energy-efficient.
6. Historic districts are a vehicle for education.

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<sup>2</sup> Hargrove, Cheryl M. 2002. Heritage Tourism. Cultural Resource Management. Issue 25-1. Getting Started: How to Succeed in Heritage Tourism. 1993. National Trust for Historic Preservation in the United States.

<sup>3</sup> Touring Historic Places, A manual for group tour operators and managers of historic and cultural attractions, National Trust of Historic Preservation and the National Tour Association, 1995.

<sup>4</sup> <https://www.colleendilen.com/2021/03/03/do-people-plan-to-travel-for-spring-break-2021-data/>

<sup>5</sup> Ibid

<sup>6</sup> [https://www.nps.gov/nature/customcf/NPS\\_Data\\_Visualization/docs/NPS\\_2019\\_Visitor\\_Spending\\_Effects.pdf](https://www.nps.gov/nature/customcf/NPS_Data_Visualization/docs/NPS_2019_Visitor_Spending_Effects.pdf)

7. Historic districts can positively impact the local economy through tourism.
8. Protecting local historic districts can enhance business recruitment potential.
9. Local districts provide social and psychological benefits.
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

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