

# Greenworks

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**RE: Comment Letter Opposing Proposed Destruction of Historic Skinners Falls Bridge  
PennDOT District 4-0**

Damascus Citizens for Sustainability (“DCS”) submits this comment letter objecting to PennDOT’s proposed destruction of the National Register-listed Skinners Falls Bridge (“Bridge”), which is also part of the National Register-listed Milanville Historic District. The Bridge is one of only three remaining pin-connected Baltimore through-truss bridges in the entire Commonwealth of Pennsylvania.<sup>1</sup> DCS is a consulting party and does not agree that the only resolution to the current situation is complete demolition of the Bridge.

PennDOT has not provided sufficient information to evaluate or substantiate its claim that the only alternative here is bridge destruction, which is an adverse effect on historic resources under Section 106 of the National Historic Preservation Act (“Section 106”). PennDOT fails to specify what structural aspects of the Bridge have deteriorated so badly in the past year (as opposed to PennDOT’s backlog of Bridge maintenance) that it can only pursue emergency demolition. The information presently available to DCS shows that the Bridge can still be rehabilitated, and could have been rehabilitated at any point in the last two or more decades.

The ultimate obstacle to the Bridge’s existence and rehabilitation is and always has been PennDOT and its *twenty-plus* year failure to prevent the Bridge from deterioration and to restore it. Critical Bridge maintenance issues that PennDOT ignored for decades are now, inexplicably but with extreme haste, PennDOT’s basis to demolish the Bridge. To allow PennDOT to destroy the Bridge on such flimsy, disingenuous reasoning and its own obstinate negligence establishes a destructive precedent for every historic and other bridge in the Commonwealth. The demolition

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<sup>1</sup> UDC May 2, 2024 PEL Study Comments, p.2.



*must* be halted, and work finally undertaken to stop the Bridge’s deterioration, and advance rehabilitation.

### **I. Inadequate Comment Period and Incorrect Consulting Party Notifications**

Due to the busiest holiday season of the year, and the last-minute, and missing, nature of information provided by PennDOT, DCS was unable to meet PennDOT’s arbitrary five-day comment period, which is shorter than the ten days noted in PennDOT’s December 12, 2024 cultural resource agency meeting. AECOM also explicitly refused to read DCS’s much shorter comments on record at the December 17, 2024 meeting.<sup>2</sup> PennDOT PATH was also offline during the Christmas holiday, shutting off any access to the documents posted on the project (MPMS #122260). The December 18, 2024 PATH notice sent to consulting parties identifying the comment period also failed to state that the Bridge was to be demolished; it told parties that the Bridge was still being “meticulously” disassembled. Two days later, on December 20 (a Friday), PennDOT told consulting parties that the bridge was to be destroyed – leaving one weekend for comment and confusion. Thus, DCS submits this comment for the administrative record, and to spur action to stop the Bridge’s destruction.

### **II. PennDOT Has Failed to Prove an Emergency, But Has Proven Abject Neglect of the Bridge, Which it Seeks to Obscure via Complete Bridge Destruction**

DCS strenuously questions the characterization of this situation as an emergency. The only emergency is that which PennDOT has created by its *over twenty-year* failure to conduct planned maintenance and proper whole bridge rehabilitation. According to AECOM’s August 2023 Historic Bridge Rehabilitation Analysis (“HBRA”) Phase I report, the last time the Bridge was rehabilitated was in 1986.

PennDOT ignored known and well-documented critical repair needs year after year after year. The reason the Bridge is in the condition it is today is because PennDOT is actively allowing it to fall apart. It allowed vegetation to grow in the masonry abutments and other parts of the Bridge. It allowed heavy rust to freeze the roller bearings on either end of the bridge, transferring forces into the Bridge abutments that the abutments are not meant to support. It allowed the masonry abutments and integrated wingwalls to crack and expand, and even recorded measurements at designated monitoring points on the masonry for over a decade. It allowed the truss members to deteriorate year after year.

In the face of its mountain of failures, instead of taking responsibility for the

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<sup>2</sup> This reinforces DCS’s opposition to the current public meeting format, which leaves no room for the public to interact or to understand what others have to say, except through the filter of whomever at PennDOT/AECOM is conducting the meeting.



situation it created, and developing a plan to save the Bridge, on December 6, 2024:

the PennDOT District 4-0 *executives* decided that due to a number of factors, including the *continued deterioration of the abutments* and concern it will be accelerated by the freeze-thaw cycle, problems associated with having a causeway in the water during the worst of the winter weather, worker safety concerns with careful disassembly, and the need to be out of the water and surrounding New York land by the beginning of the summer recreation season, *the bridge will be demolished* rather than removed in a way that allows for future rehabilitation consideration. This will result in an adverse effect to historic properties.

12-12-2024 Skinners Falls Bridge Emergency Project Cultural Resources Agencies Briefing, p.1 (emph. added).

It is presently unclear what data, studies, or analyses the District 4-0 Executives used to make their decision. No document posted to PATH is dated prior to the December 6, 2024 decision. As explained in this letter, PennDOT has provided no analysis to support its fear that the NY abutment will imminently and catastrophically collapse. This black hole of information and analysis is contrary to Section 106, which requires that the public be able to comment in an informed manner throughout the process. 36 C.F.R. §§ 800.2(d); 800.3(e), 800.3(g) (expediting consultation among the parties cannot occur at the expense of informed public comment and involvement), 800.4(d)(2); 800.6(a)(2)-(4), 800.11.

This is not the first time that PennDOT has left the public and consulting parties in the dark. PennDOT has repeatedly failed to meet its Section 106 obligations in this “emergency” situation. For instance, DCS requested information and documents in a November 21, 2024 email, but PennDOT only provided some of the requested information and documents after repeated communications by DCS’s attorney. DCS did not receive until Monday, December 17, 2024 (one day before PennDOT’s public meeting) the October 2024 bridge inspection report, which is 183 pages, not including the appendix that, PennDOT withheld under 75 Pa.C.S. § 3754(b))<sup>3</sup>. DCS and any

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<sup>3</sup> DCS contests PennDOT’s use of 75 Pa.C.S. § 3754(b) to withhold fracture critical and similar information from the public’s ability to review the state of the bridge. Section 3754 states that the confidentiality provisions apply to “in-depth accident investigations and safety studies of the human, vehicle and environmental aspects of *traffic accidents* . . .” and “information, records and reports used in their preparation,” when those studies are conducted or compiled by PennDOT together with the Pennsylvania State Police (“PSP”). 75 Pa.C.S. § 3754 (emph. added); Com. v. Hall, 744 A.2d 1287, 1289-90



experts had no reasonable time to review and digest it before the December 18, 2024 public meeting. Also, DCS had asked in its November 21, 2024 email that studies and material about the Bridge be *posted online*, not doled out solely to those who ask. PennDOT never complied with DCS’s request.<sup>4</sup>

Thus, as with previous information, the data and studies the District 4 executives used to justify demolition of the Bridge remain a mystery,<sup>5</sup> contrary to Section 106 and the National Environmental Policy Act.<sup>6</sup> This, however, is not due to a lack of studies. The Upper Delaware Council (“UDC”) has repeatedly noted that PennDOT has spent approximately \$4 **million dollars** (not including money spent in 2024) on studies on the Bridge. Where are those studies?

AECOM’s October 7, 2024 inspection report does little to advance PennDOT’s desire for full bridge demolition. Almost all of the information is a summation of twenty-plus years of inspection reports. AECOM’s October 7, 2024 report does not justify demolition. Rather, it is an indictment of PennDOT’s repeated deferred critical maintenance, which twenty years of inspection reports document. Thus, nothing in AECOM’s October 7 inspection report substantiates the fear of a catastrophic collapse. The report still identifies a path forward for Bridge rehabilitation in the form of the work PennDOT has sloughed off for decades. This is in addition to AECOM’s May 2023 HBRA Phase I report confirming rehabilitation is possible.

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(Pa. Super. Ct. 2000); see also 65 P.S. § 67.708(16) (referring to 75 Pa.C.S. § 3754(b) as “relating to accident prevention investigations”).

The Bridge is closed to traffic. There is nothing about the studies, inspection reports, or other related information regarding the Bridge that relate to traffic accidents, and there was no involvement by the PSP. Cf. Com. v. Hall, 744 A.2d at 1289-90. Section 3754 is limited in its scope, id., and cannot be used to block the public from understanding the state of the Skinners Falls Bridge, or from analyzing whether the data PennDOT and its consultants have collected matches up with PennDOT and its consultants’ claims about the Bridge and what is or is not possible for rehabilitation and restoration.

<sup>4</sup> Likewise “the draft Section 106 agreement, qualifications, bid package and information about measures to protect river traffic [were] not available” even after the November 2024 meeting at which they were supposed to be discussed. At this point, it appears there may never have been any plan to provide them, given the sudden, arbitrary pivot to explosive demolition of the Bridge.

<sup>5</sup> Also a mystery is PennDOT’s recent (as of the last month) choice to remove the entire “project class” column from the STIP, which previously identified project classes such as “bridge preservation” or “bridge restoration,” including in regard to the Bridge.

<sup>6</sup> DCS continues to object to the application of a categorical exclusion in this situation.



PennDOT has watched the cracks in the Bridge abutments and wingwalls widen over a twenty-year period. Even in November 2024, when PennDOT proposed to dismantle the Bridge, it claimed it was doing so merely “out of an abundance of caution.”<sup>7</sup> How is it that suddenly *now*, not even a month later, the Bridge is too unstable? PennDOT has no answer. In April and August 2024, AECOM still rated the bridge substructure as “2” on the National Bridge Inventory System (“NBIS”) rating scale. However, AECOM inexplicably downgraded the Bridge substructure to an NBIS rating of “0” by October. No monitoring point measurements of the NY wingwalls changed during that time.<sup>8</sup> Further, the shift in the Bridge *superstructure* at the NY abutment, which AECOM cited as another reason to downgrade the Bridge, *has been present since at least 2017*, if not earlier.<sup>9</sup> Thus, if the problem is so bad, it is one that PennDOT felt that it could ignore for years at an NBIS rating of “2” without the Bridge collapsing, including several additional years of traffic use.

A substructure NBIS rating of “0” means no corrective action is possible, but the Bridge remains standing and nothing in AECOM’s report states that the Bridge cannot be rehabilitated. In fact, AECOM told PennDOT that the NBIS “0” rating could be mitigated to a “1” because the Bridge is closed to traffic.<sup>10</sup> PennDOT repeatedly took

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<sup>7</sup> <https://www.pa.gov/agencies/pennDOT/projects-near-you/district-4-projects/skinners-falls-bridge-project.html>

<sup>8</sup> October 2024 AECOM inspection report, PDF pp. 157-164. The measurement charts for the NY wingwalls are included with this letter as Attachment A.

<sup>9</sup> November 2017 inspection report, PDF p.5: “The expansion truss bearings at the abutments appear frozen with debris and pack rust. *At the far abutment the superstructure is shifted laterally on the bearings exposing the tops of the rollers along the right edge.* . . . The cut stone truss bridge seats (cap stones) are cracked and/or fractured at the near left, far left and far right. At the far left the stone is fractured and settled resulting in an area of bearing loss at the back face. This condition was not previously noted *but does not appear new*. It was obscured by several inches of roadway gravel and debris.” (emph. added).

This may be the same condition identified in a February 2013 inspection report (PDF page 6) as: “Far Right bearing at Span 2 is displaced transversely 3 ¼” and is impacting the right side of the deck.”

Regardless, the condition is not new as of August 2024, which seems to be PennDOT’s contention. The question that PennDOT has failed to answer is – how much worse *is* the condition of roller bearings in reality compared to prior years, particularly since it ignored the issue for years? As noted later in this letter, PennDOT’s claim of alleged “rapid deterioration” of the NY abutment/wingwalls is not supported by the data in the October 2024 AECOM inspection report, making it crucial that all of PennDOT’s claims be heavily scrutinized.

<sup>10</sup> October 2024 AECOM inspection report at PDF p.169. AECOM again refers to “significant deterioration” of the abutments, but fails to clarify *what* “significant deterioration” has occurred in the last year meriting full bridge demolition, as opposed to the deterioration allowed and ignored by PennDOT for years that, despite PennDOT’s efforts, can still be rehabilitated.



such an approach in the past, choosing to ignore a “0” rating on this Bridge because it was closed to traffic, and deferred critical maintenance year after year. Suddenly now, PennDOT has latched onto the faulty “0” substructure rating to justify whole bridge destruction. This is arbitrary and unacceptable.

While a catastrophic collapse would be highly undesirable, a mere *fear* of collapse, without more, is insufficient to obliterate a National Register bridge. If there is a justifiable and quantifiable risk of collapse, the public deserves to review the data and analysis that PennDOT is relying on. PennDOT (including its consultants) has provided nothing to that end.

Instead, PennDOT has chosen to evade Section 106, NEPA, and the Environmental Rights Amendment, hoping no one will notice its twenty-plus year abject neglect of the Bridge. The Advisory Council on Historic Preservation (“ACHP”) agreed, stating:

[W]e note from [the Federal Highway Administration’s (“FHWA”) email that the poor condition of the bridge has been known for at least five years, and it is unclear whether there was action that could have been taken that would have prevented its deterioration to the point of potential collapse. As you know, 36 CFR 800.5(a)(2)(vi) *identifies neglect of a property which causes its deterioration as an adverse effect itself. Utilizing the emergency procedures as a way to circumvent the meaningful consideration of avoidance or minimization measures to resolve the adverse effect undermines the intent of Section 106.*

December 20, 2024 Email from ACHP to FHWA (emph. added). PennDOT knew about the Bridge’s deteriorating condition, and ways to fix it, for about four times longer (i.e. twenty years) than the timeframe the FHWA cited in its notification to the ACHP.

### **III. PennDOT’s Persistent Refusal to Halt and Rehabilitate Bridge Structural Decay, Demonstrated by NY Abutment/Wingwalls and Roller Bearing Nests**

Stepping back further, how *did* we end up here, with a National Register bridge slated for explosive demolition and permanent destruction, instead of careful and expert rehabilitation and restoration, which is still possible?

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DCS will focus on what appears to be PennDOT’s present overriding concern, which is the New York (“NY”) abutment and associated wingwalls. DCS will also focus on the bridge’s roller bearings, since they directly relate to the structural integrity of the NY-side bridge substructure. These are not the only Bridge components that have suffered decades of neglect,<sup>11</sup> but merely illustrative examples.

For the benefit of the public who may read this letter, the abutments and wingwalls are on either end of the Bridge and form part of the Bridge’s *substructure*. The abutments and wingwalls on the Skinners Falls Bridge are integrated with each other, which is not necessarily the case on every bridge. The abutments stand perpendicular to the River, while the wingwalls fan out from the abutments toward the land. Bridge abutments are crucial to supporting a bridge’s *superstructure* (e.g. the trusses), and are designed to manage vertical, but not lateral (e.g. horizontal) forces. Bridge wingwalls help contain and prevent erosion of land behind bridge abutments and may also provide lateral support.

Roller bearings are a relatively small, but crucial, part of the Bridge. The Bridge’s “nests” (groupings) of roller bearings link the Bridge’s superstructure to the abutments, which, in turn, provide vertical support for the superstructure. Roller bearings are designed to allow certain types of superstructure movement, including expansion and contraction caused by freeze-and-thaw cycles. However, these roller bearings can become “frozen” without regular proper maintenance/repair to remove rust, corrosion, and debris. When roller bearings freeze, they can no longer move as needed to relieve forces from bridge loads (e.g. traffic) or from thermal expansion and contraction. Instead, those forces are transmitted to the bridge abutments, which are not meant to manage such forces and movement. Over time, if the frozen bearings are not fixed, the bridge abutments will deteriorate from the lateral and other forces being directed into the abutments from the upper parts of the bridge that the roller bearings would have otherwise alleviated. This chain of events appears to have happened with the Skinners Falls Bridge, but not to the point of the Bridge needing to be demolished.<sup>12</sup>

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<sup>11</sup> For instance, the Bridge truss members have a similar pattern of deferred maintenance and documented deterioration and section loss over a period of at least two decades. The same is true for the Bridge’s overall paint job, as a full paint job of the Bridge was repeatedly deferred. Not surprisingly, AECOM inspection reports from 2024 identify some of the debris falling from the Bridge as rust flakes, indicative of PennDOT’s repeated neglect of the Bridge.

<sup>12</sup> AECOM’s May 2023 HBRA Phase I report at page 33 expressly notes, “it will also be necessary to rehabilitate/replace the existing bearings that are not functioning properly and are in poor condition. *As a result of the existing bearings’ lack of functionality, the thermal movements of the bridge are being restricted, affecting the superstructure and substructure.*” (emph. added).



The Skinners Falls Bridge has a set of roller bearings on each abutment. These connect the trusses to each abutment. The Bridge’s roller bearings have been frozen and “twisted out of plane” since *at least*<sup>13</sup> **September 2004**. Before that, yearly inspection reports warned that the rollers were heavily rusted, which meant that they could freeze up and no longer function. PennDOT failed to address the rusting. It likewise did not repair or rehabilitate the roller bearings. It repeatedly deferred maintenance of the bearings, despite the following: (a) the bearings being identified as a Priority 1<sup>14</sup> maintenance issue since at least October **2006**; (b) inspections documenting the bearings’ continued deterioration and adverse impact on the bridge deck and span; and (c) designation as a critical deficiency since *at least* 2012.<sup>15</sup> Even so, the roller bearings can still be fixed and their important role in mitigating lateral structural forces on the Bridge restored.<sup>16</sup>

Not surprisingly, the bridge abutments and wingwalls have deteriorated in the same time frame as the roller bearings. How long has PennDOT known the wingwalls and abutments have been cracking? Since at least 1998, with cracks on NY wingwalls monitored for movement since at least 1999. Masonry repointing work was identified as a priority 3 maintenance item in October 2006. Repair of the northern wingwall on the NY side (also called the “far left wingwall”) became a Priority 1 item in March **2009**, when cracks widened approximately 2 inches in a 6-month period, and decreased the substructure rating to a 3.

In February 2013, an inspection report found the roller bearings fully extended and that the “far right bearing at Span 2 is displaced transversely 3 ¼ inches and is impacting the right side of the deck.” In that same report, the inspector noted that the NY-side wingwall cracks had expanded up to 1 ¾ inches in a 12-month period. In November 2017, an inspector noted that the fractured capstone on the NY abutment was directly behind the frozen Bridge bearings, and that the vertical stepped crack in the NY northern wingwall “originates under the fractured capstone of the left truss.”<sup>17</sup>

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<sup>13</sup> Improper redactions on the 10-1-2002, 9-30-2003, and 3-30-2004 inspection reports that DCS received from PennDOT prevent DCS from identifying whether the roller bearings were frozen earlier than September 2004.

<sup>14</sup> Priority 1 maintenance items are meant to be addressed within six months.

<sup>15</sup> See, e.g., April 2024 AECOM inspection, PDF p.20. Instead of fixing the bearings, PennDOT *downgraded* the work’s priority at some point in time because the Bridge was closed. It did the same downgrading of work priority in regard to the wingwalls. *Id.*

<sup>16</sup> See, e.g., AECOM’s May 2023 HBRA Phase I report, p.33.

<sup>17</sup> November 2017 Inspection Report, PDF pp. 37 (both photos), 43 (photo 65).





This connected pattern of roller bearing and abutment/wingwall deterioration only progressed until present day because PennDOT never restored key structural Bridge components. That said, despite PennDOT's neglect, the NY northern wingwall monitoring points show *no* change in movement for at least the past two years. (Attachment A). Likewise, the NY southern wingwall's monitored point measurements have not changed during 2024, and in some cases have been stable since 2022. (Attachment A). The NY abutment and wingwalls have *not rapidly* deteriorated as PennDOT has claimed, making bridge destruction completely inappropriate. Instead, PennDOT *can still restore* the Bridge and remedy the structural forces that have been contributing to the Bridge's slow deterioration. AECOM May 2023 HBRA Phase I report confirms as much.

The stepped crack through the NY northern wingwall, the fractured capstone on the NY abutment, the displacement of the Bridge superstructure due to the frozen bearings – PennDOT knew all of this, and did nothing to address the forces tearing apart the historic bridge. Even so, the Bridge has held on and, as noted above and in the measurements in Attachment A, there has been no change in the NY abutment and wingwall measurements within at least the past year.

Instead of addressing the bearings and masonry wingwalls, which – as of the November 2019 inspection – had an initial estimated materials cost of \$11,660 and \$63,600, respectively,<sup>18</sup> PennDOT's inspection consultant, in 2020, inexplicably *downgraded* the bearings and wingwall items to priority 2 “adjust schedule as needed.”<sup>19</sup> Five years later, in its October 7, 2024 report, AECOM has designated the *same problems* as Priority 1 (needing addressed within 6 months), although it fails to distinguish between the abutment and wingwall as did earlier inspections. It identified *no* problem as needing addressed within 7 days. And, the materials cost of all listed repairs in the October 7, 2024 report was less than \$3 million dollars of materials.<sup>20</sup> The Statewide Transportation Improvement Program (“STIP”) presently has allocated \$6 million for this “emergency” situation.

After *twenty years* of doing nothing to rehabilitate and restore the Bridge, PennDOT suddenly, within two months, switched to claiming an emergency requiring, initially, immediate bridge dismantling “out of an abundance of caution”, and then complete destruction of the historic bridge because of decades of deferred maintenance,

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<sup>18</sup> November 2019 Inspection Report, PDF pg.9.

<sup>19</sup> AECOM's April 2024 inspection report suggests that this downgrading was done because the Bridge was closed to traffic. This did nothing but prolong the Bridge's deterioration.

<sup>20</sup> October 2024 AECOM Inspection Report, PDF pg. 7.



a freeze-and-thaw cycle that happens every year, and the fact that Wayne County is subject to winter weather and summer boating traffic – none of which are a surprise.<sup>21</sup>

#### **IV. PennDOT Continues to Violate Section 106, NEPA, and the Environmental Rights Amendment, and to Potentially Misuse Taxpayer Dollars to Advance an Oversized, New Bridge instead of Rehabilitation**

PennDOT’s dramatic and rushed schedule during the busiest holiday season of the year when the public is focused elsewhere is highly suspect. Although bridge demolition would certainly achieve what to the public appears to have been PennDOT’s goal all along – a 40-ton, two-lane bridge out of character and unneeded for the area – it directly contravenes the procedural requirements of Section 106<sup>22</sup> and NEPA, and violates the Environmental Rights Amendment. “The people have a right . . . to the preservation of the natural, scenic, historic and esthetic values of the environment.” Pa. Const., art. I, § 27, cl.1. Absolutely *nothing* about how PennDOT has handled the Skinners Falls Bridge situation lives up to that mandate. PennDOT has no strategy on how it plans to preserve the historic, esthetic, and scenic values that the Bridge contributes to Milanville, Cocheton, and to the Upper Delaware Wild and Scenic River. Its only strategy is completely contrary to the constitutional command.

Ultimately, the emergency to the public is PennDOT. PennDOT chose, over decades, not to fix the known problems on the Bridge that it now claims are the reason it needs to destroy the Bridge in full. It repeatedly chose not to pursue a full rehabilitation of the Bridge. It inexplicably accepted the 2020 inspection report that *downgraded* necessary repairs that PennDOT had deferred year-after-year. In 2021, the public perception was that PennDOT sought to force it to accept a bridge replacement, which the public – as the record shows – clearly rejected in favor of saving and rehabbing the Bridge. PennDOT then did absolutely nothing to prevent the Bridge from further decrepitation. Nothing. As well-stated by the Upper Delaware Council (“UDC”) in May 2024:

We also call for an acceleration of the protracted study period since the bridge's October 2019 closure to mitigate against its

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<sup>21</sup> To the extent there is any concern about winter boating traffic and Bridge debris, DCS notes that any winter boating traffic is extremely minimal. PennDOT announced in August 2024 that it would install bridge netting to catch debris. However, PennDOT never installed such netting.

<sup>22</sup> PennDOT has attempted to use the emergency provisions of the Section 106 process, complete with a declaration from Governor Shapiro. However, again, this is a manufactured emergency contrary to the purposes of federal historic preservation laws and the Environmental Rights Amendment. Further, PennDOT has not disclosed what precisely it told the Governor’s office about the nature of the emergency. The information in the Governor’s December 16, 2024 letter strongly suggests that PennDOT told the Governor’s office the same story that DCS has shown herein to be false.



further deterioration and escalating construction costs. We are mindful of the required evaluation process to comply with the National Environmental Policy Act and the National Historic Preservation Act Section 106, but see no actual timelines offered in the draft study other than references to "future phases" and "further investigation." The report provides thoroughly researched documentation. However, after investing 4-1/2 years and \$3,692,500 in New York-Pennsylvania Joint Interstate Bridge Commission study allocations through 2023, no alternative has been selected.

UDC May 2, 2024 PEL Study Comments, p.1.

Three months later, UDC informed PennDOT that debris was falling into the River from the Bridge, and again emphasized:

The UDC remains dismayed over how protracted and costly (at nearly \$4 million) this Planning and Environmental Linkages Study has been since the beloved historic bridge was closed to all traffic on October 16, 2019. It's [sic] inevitable that the bridge continues to structurally decay while awaiting the determination of its fate.

August 2, 2024 UDC Email to PennDOT. And decay it did, while rehabilitation or stabilization of the Bridge's condition might possibly have been achieved for that same 4 million dollars.

At this point, PennDOT has 6 million dollars that were originally slated for the disassembly and storage of the Bridge, that now are apparently slated for Bridge destruction. DCS strongly disputes that Bridge demolition costs that much money. The available funds should be used to stabilize the Bridge's condition, based on AECOM estimates of repair costs, which would leave at least 3 million dollars for permitting, engineering, and related labor costs. From there, rehabilitation by knowledgeable companies can be pursued with proper haste and review.

PennDOT, with the approval of the Governor, is setting a destructive precedent for every historic and other bridge in the Commonwealth. That precedent is: wait, watch, and document as the bridge falls apart, year after year, until PennDOT can declare an emergency to circumvent established Section 106, NEPA, and other procedures to pursue the goal *it* wants – rather than the outcome: (a) best suited for the



community; (b) that the community has clearly stated it wants; and (c) that fulfills the requirements of Section 106, NEPA, and the Environmental Rights Amendment.

PennDOT’s race to demolish the Bridge is not just unconstitutional, but also fiscally irresponsible. It has paid millions of dollars to private consultants for “studies” while the Bridge decayed further, and maintenance costs only rose decade after decade. DCS understands that funding for roads and bridges is not always easy to come by. However, DCS has witnessed a pattern of PennDOT and its private consultants dragging out bridge project processes for decades, spending countless taxpayer dollars, until PennDOT finally gets what it wants, which is usually the destruction of another historic bridge. Pond Eddy Bridge is only one recent example.<sup>23</sup>

The people of Pennsylvania deserve better. This community deserves better. However, once again, the Commonwealth of Pennsylvania has abjectly failed them. The obliteration of the historic Skinners Falls Bridge must be halted, and the Commonwealth of Pennsylvania (including PennDOT) must be held to account for its continued destruction of historic, natural, scenic, and other resources that are integral to the fabric of communities, their economies, and their collective joy and memory. That accountability must include: (a) a reversal of PennDOT’s planned Bridge destruction; and (b) proper rehabilitation and restoration of the Bridge, including immediate prevention of further Bridge decay using known available funds and expertise.

Thank you for your time and consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Lauren M. Williams', with a long horizontal flourish extending to the right.

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

Enclosure – Attachment A

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<sup>23</sup> See UDC May 2, 2024 PEL Study Comments, p.2.



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Advisory Council on Historic Preservation (via separate email)

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