

Skidders Falls Bridge Project Planning and Environmental Linkages Study

Draft Purpose and Need Public Comment Response Report, May 2022

This comment response document provides a summary of public input and responses to comments received on the Draft Purpose and Need (P&N). The Draft P&N document was provided to the public for review and comment from December 8, 2021 through February 7, 2022 through the project website (<https://www.penndot.gov/RegionalOffices/district-4/PublicMeetings/Wayne%20County/Pages/Skidders-Falls-Bridge-Project.aspx>).

Printed copies were distributed throughout the project area for review during the comment period at the following public locations:

- Milanville General Store – 1143 River Rd, Milanville, PA
- Western Sullivan Public Library, Delaware Free Branch – 45 Lower Main St, Callicoon, NY
- Western Sullivan Public Library, Tusten-Cochecton Branch – 198 Bridge St, Narrowsburg, NY

Comments were accepted through a digital survey platform, email, and mail. The digital and printed survey forms included two multiple choice questions in addition to open-ended comment fields.

Survey Questions

The specific survey questions and the results are shown below in Figure 1 and Figure 2. Fifty-seven (57) survey responses were received. Approximately two-thirds of respondents (37) agreed that the Draft P&N adequately documented the transportation purpose and needs for the Skidders Falls Bridge Project.

For the second question, "...are there other transportation purpose(s) or need(s) not identified...?", greater than half (32) of the respondents replied no, with slightly less than half (25) responding that there are other purposes or needs that haven't been identified.

The responses to the write-in comments from the survey are addressed as part of the overall comment and response section (see page 3 and Attachments 1-3 of this report). Survey responses in the attachments include a number designation representing the order in which they were received.

Figure 1: Survey Question 1 Results¹

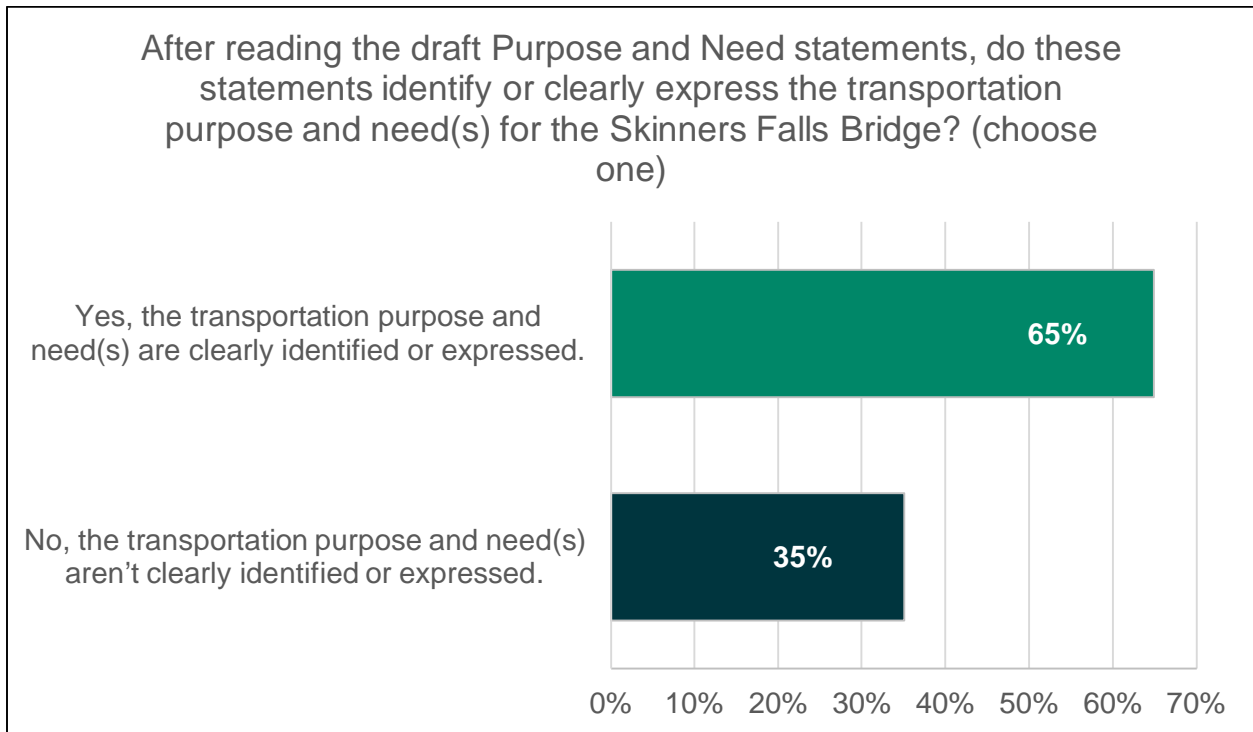
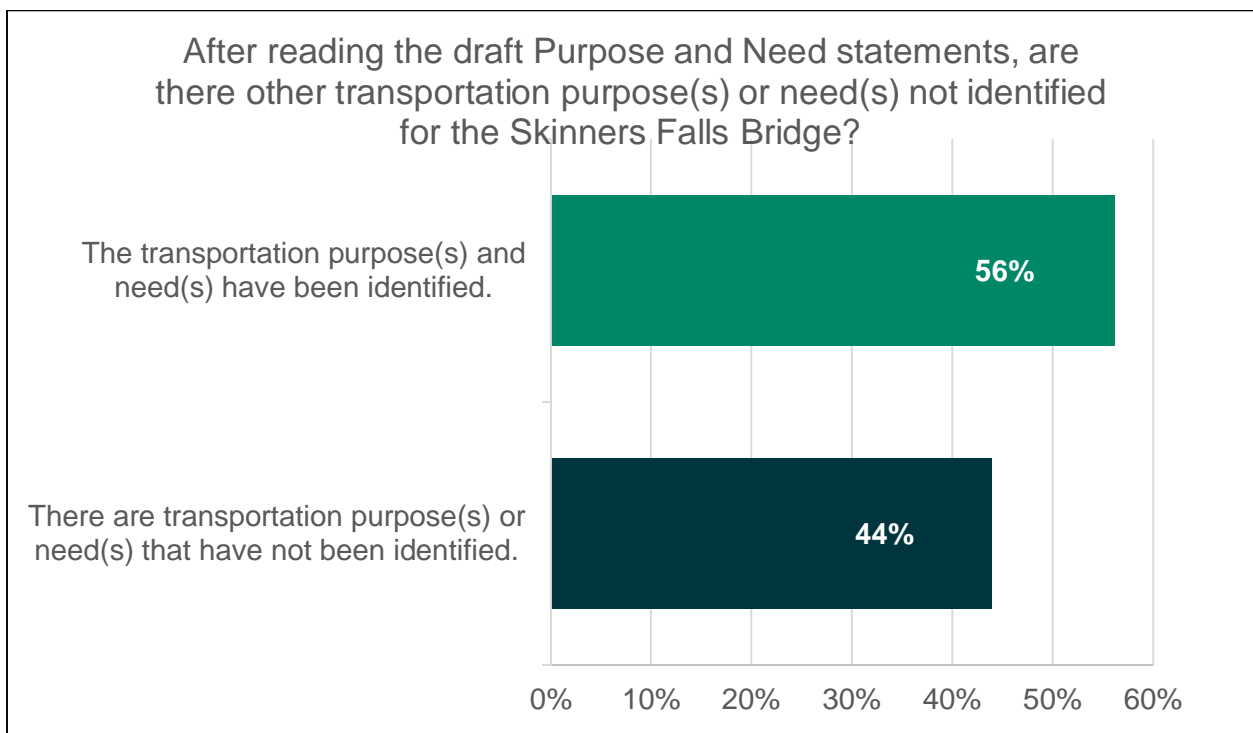


Figure 2: Survey Question 2 Results¹



¹ The results shown in Figures 1 and 2 exclude duplicate submissions.

Comments

Write-in comments received are organized by public citizen comments (Attachment 1), county and local organization comments (Attachment 2), and federal and state agency comments (Attachment 3).

In reviewing the comments, several topics were repeatedly mentioned. For the same or very similar comments, one response is provided below. The topic is stated in bold text followed by a summary description of the various comments. The bolded topic is referenced, where appropriate, in the attached comments (Attachments 1-3).

In addition to the most frequently submitted comments with responses below, unique or tightly focused comments were submitted. Responses to these specific comments begin on page 11 and are organized alphabetically.

Responses to the Most Frequently Submitted Comments

1. **Historic Preservation:** *Many commenters stated the P&N statement is deficient because it does not include preservation of the historic bridge, and they requested the value of the Skinners Falls Bridge as a cultural resource be considered as part of the P&N.*

Response:

The Skinners Falls Bridge Project is being undertaken by the Pennsylvania Department of Transportation (PennDOT) in cooperation with the New York State Department of Transportation (NYSDOT) and Federal Highway Administration (FHWA). As transportation agencies undertaking a transportation project to a transportation facility, the Fixing America's Surface Transportation (FAST) Act (23 U.S.C. 139²) is applicable and must be followed.

The FAST Act requires that “the statement of purpose and need shall include a clear statement of the objectives that the proposed action is intended to achieve, which may include –

- (A) Achieving a transportation objective identified in an applicable statewide or metropolitan transportation plan;
- (B) Supporting land use, economic development, or growth objectives established in applicable Federal, State, local, or tribal plans;
- (C) Serving national defense, national security, or other national objectives, as established in Federal laws, plans, or policies.”

The Skinners Falls Bridge Draft P&N is written in accordance with the FAST Act. The project purpose is a clear statement of the transportation objectives that the proposed project is intended to achieve. The project needs present the problems the proposed project will address. The P&N cannot include a solution or indicate a particular action. Bridge preservation, while it may be considered, is a specific action. Therefore, historic bridge preservation cannot be included as a purpose or need component.

Additionally, the Draft P&N is written in accordance with Section 106 of the National Historic Preservation Act of 1966 (54 U.S.C. 300101³), which requires the evaluation of alternatives or modifications to the undertaking that could avoid or minimize effects to the historic

² <http://uscode.house.gov/browse/prelim@title23/chapter1&edition=prelim>

³ <https://www.govinfo.gov/content/pkg/USCODE-2014-title54/html/USCODE-2014-title54-subtitleIII.htm>

resource. The Draft P&N does not preclude an outcome (i.e. the P&N does not indicate that the only way to achieve the purpose and need is to remove the historic resource). The Draft P&N statement is written in accordance with the Wild and Scenic Rivers Act (WSRA), which requires avoidance or minimization of effects to the point that they are no longer considered adverse to the Skinners Falls Bridge, which is an element of the Cultural Resource Outstandingly Remarkable Values that represent the Upper Delaware Scenic and Recreational River (i.e. the Draft P&N does not state that the Skinners Falls Bridge will be adversely affected)⁴.

The preservation of historic resources is considered during the Section 106, Section 4(f), WSRA Section 7, and National Environmental Policy Act (NEPA) processes. Furthermore, it is PennDOT's policy that a project involving the potential replacement of a National Register eligible or listed bridge, or a bridge that is determined to be a contributing element to a National Register eligible or listed historic district, as is the case with the Skinners Falls Bridge, warrants the consideration of a rehabilitation alternative.⁵ PennDOT will conduct a Historic Bridge Rehabilitation Analysis, which is an analysis of the ability of the historic bridge to be rehabilitated to meet project needs while retaining its character-defining features. The Historic Bridge Rehabilitation Analysis will be the next step after the P&N is finalized.

2. **Alternatives:** *Many commenters noted their preference for or against specific alternatives, such as a "modern new bridge", "in-kind restoration", or "a light capacity, low volume bridge will fit these needs adequately". Comments also noted the P&N statement is skewed toward a bridge replacement rather than a rehabilitation.*

Response: At this point in the project delivery process, specific project alternatives are not under consideration.

The P&N is a clear statement of the objectives that the proposed project is intended to achieve and serves as the basis for the development of the criteria which will be used to eventually select an alternative. The P&N consists of two components:

- 1) The purpose, which is the primary objective of the project and spells out the reason why a project is to be undertaken. *It does not include a specific solution.*
- 2) The need, which is a discussion of the transportation problems, the causes of those problems, and supporting data. *It does not include a specific solution.*

A P&N statement is a beginning step in the project delivery process and is required for PennDOT projects. A P&N is also necessary for future analyses related to Section 106 of the National Historic Preservation Act of 1966, Section 4(f) of the Department of Transportation Act/Section 2002 of Pennsylvania Act 120, the National Environmental Policy Act (NEPA) of 1969, Section 404 of the Clean Water Act permits, and Pennsylvania Chapter 105 water obstruction permits.

The Skinners Falls Bridge Project Draft P&N Statement does not assume a solution and is not so focused that only one alternative can work. The rehabilitation alternative has not been eliminated. As a National Register-listed bridge that also contributes to a listed historic

⁴ National Park Service, 2021. *Reference Manual 46: Wild and Scenic Rivers*.
https://www.nps.gov/subjects/policy/upload/RM-46_04-12-2021-2.pdf.

⁵ PennDOT, 2021. *Publication 689, The Transportation Project Development Process: Cultural Resources Handbook*.

district, thorough evaluation and consideration of the rehabilitation alternative is required. This evaluation cannot move forward without a comprehensive understanding of the project's purpose and needs. After the P&N is approved, the next step is to complete a Historic Bridge Rehabilitation Analysis.

Alternatives will be developed in accordance with PennDOT's *Design Manual Part 2, Highway Design*⁶; PennDOT's *Design Manual Part 2, Contextual Roadway Design*⁷; and AASHTO's *Guidelines for Geometric Design of Low-Volume Roads*⁸ (applicable for local and minor collector roads carrying average daily traffic volumes of 2,000 vehicles per day or less). An alternatives analysis will be conducted and will consider the degree to which each alternative meets the P&N, and potential environmental and historic resource impacts, architectural treatments, traffic analyses, construction cost, and potential future maintenance costs of each.

3. **Safety:** *New bridge would result in increased traffic and higher speeds which would create unsafe conditions.*

Response: As noted above in response #2, project alternatives have not been developed yet. Potential project alternatives, including a rehabilitation alternative, will be evaluated for the safety of all users. This is part of the project purpose, which states, "The purpose of the project is to provide a safe and efficient crossing of the Delaware River at Skinners Falls for cars, trucks, trailers, emergency response vehicles, bicyclists, and pedestrians." Traffic calming measures may be included as part of the alternatives in accordance with design guidelines.

4. **Emergency Response:** *Considering the original weight limit of the bridge and the typical weight of certain fire trucks, including emergency response vehicles in the project purpose appears to set an unachievable standard of inadequacy for the bridge's restoration to its original capacity. Additionally, many commenters noted the emergency response is adequate as is/at the previous nine-ton bridge weight limit and questioned the credibility of the emergency response needs as stated in the Draft P&N.*

Response: To more clearly articulate the emergency response driven project needs, the emergency response need was split into two needs. Need 2 now focuses on emergency response as it pertains to river rescue. Need 3 now expounds on fire and medical emergency response.

As stated in the Skinners Falls Bridge P&N Statement footnote 3, emergency response vehicles are vehicles that support ambulance service, fire/rescue service, and law enforcement. Emergency response vehicles may range in weight from approximately 1.5 tons for responders utilizing a personal car to 31 tons for a full water tanker. Table 1 below lists typical emergency vehicle weights.

⁶ PennDOT, 2021. *Publication 13M, Design Manual Part 2, Highway Design, March 2015 Edition, December 2021 Change No. 7.*

⁷ PennDOT, 2021. *Publication 13, Design Manual Part 2, Contextual Roadway Design.*

⁸ American Association of State Highway and Transportation Officials (AASHTO), 2019. *Guidelines for Geometric Design of Low-Volume Roads.*

Table 1: Typical Emergency Vehicle Weight

Emergency Service Vehicle	Approximate Weight (Tons)
Standard Car	1.5
Personal Truck	3
NPS River Rescue	4.5
Ambulance	5-7
Brushfire Truck	6
Mini Pumper Truck	8.5-15
Tanker, Empty	15
Fire Rescue Truck	15.5
Fire Engine	25.5
Tanker, Full	31

Considering the original capacity of the bridge at nine tons and assuming the bridge could be restored to that capacity, there are several classes of emergency response vehicles that could utilize a restored bridge. Therefore, it is possible to achieve the project purpose related to emergency response vehicles even when considering the original weight capacity of the bridge. As a point of clarification, the term “fire trucks” in Need 2 was replaced with “firefighting apparatuses” to indicate a range of fire emergency response vehicles. The sentence in the P&N now states, “The LHVFD stressed the need for a bridge over the Delaware River near Skinners Falls that can handle the weight and size of firefighting apparatuses”.

The National Park Service (NPS) emergency response needs stated in the Draft P&N are based on correspondence directly from the NPS. PennDOT, NYSDOT, and FHWA consider information provided by the NPS as credible and authoritative.

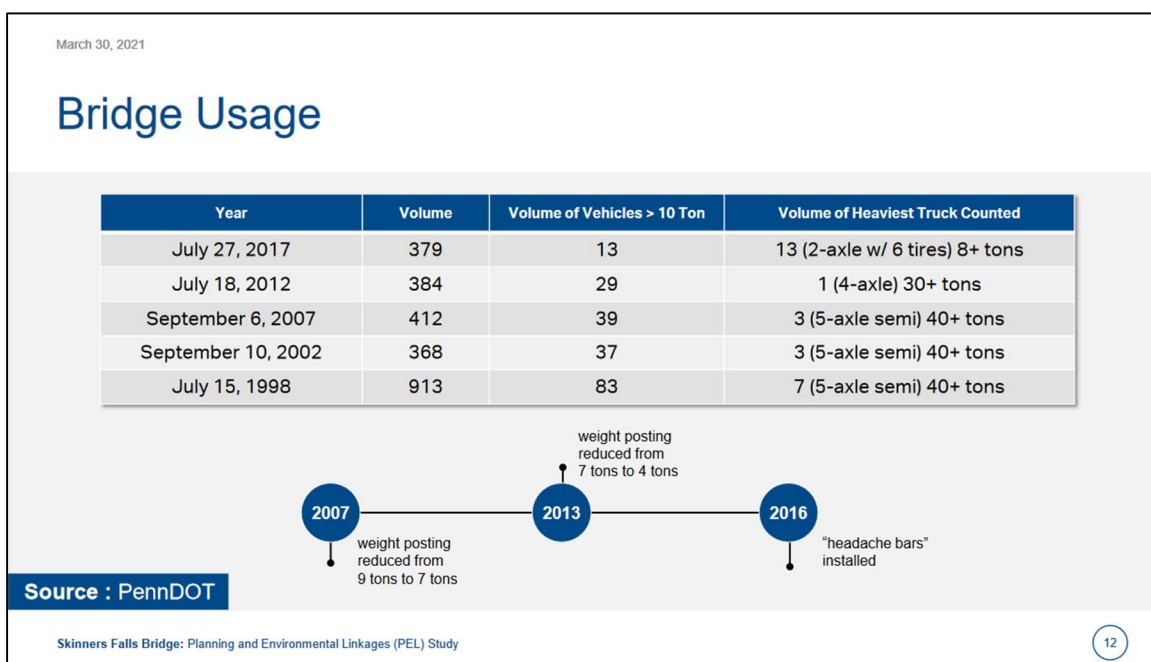
In addition, the absence of a crossing at Skinners Falls has been identified by local residents, Project Advisory Committee members, and emergency responders as an important issue for efficient emergency response. The project team interviewed the fire chiefs from Equinunk Volunteer Fire Company, Lake Huntington Volunteer Fire Department, Narrowsburg Fire Department, and Welcome Lake Fire and Rescue, and made multiple attempts to interview Beach Lake Volunteer Fire Company. Mutual aid calls regularly occur, and the emergency service providers on both sides of the river depend on each other for assistance. A crossing at Skinners Falls would enable emergency response providers to improve their overall response times and minimize their travel time and distance on River Road by utilizing NY 97 and crossing the river at a bridge nearest to the emergency location. PennDOT, NYSDOT, and FHWA consider the input from the fire departments as credible and authoritative. Moreover, 56% of survey respondents from the Draft P&N public comment period selected, “Yes, the transportation purpose(s) and need(s) have been identified,” (see Figure 2). Five of these survey respondents self-identified as emergency responders. Three out of five of the emergency responders, or 60%, also selected, “Yes, the transportation purpose(s) and need(s) have been identified.” Therefore, the Draft P&N public comment survey responses indicate that the majority of the public supports the emergency response needs.

5. **Large Trucks:** Large truck (40-ton) crossing is not needed at Skinners Falls Bridge. The two other nearby bridges at Damascus-Cochecton or Narrowsburg are adequate. Illegal truck

crossing does not constitute a need. The connecting road network cannot handle increased vehicle loads due to their weight posting and geometry (e.g. narrow lanes, steep grades, and curves) or increased traffic. The compatibility of the proposed bridge capacity with the capacity of local roads should be considered.

Response: The adjacent Damascus-Cochecton and Narrowsburg Bridges are not weight-posted and provide alternate crossings of the Delaware River. However, as stated in the Draft P&N, overweight vehicles have used the Skinners Falls Bridge despite the weight-posting and headache bars. Figure 3 below is excerpted from the March 30, 2021 Public Meeting and shows data related to overweight vehicle usage. The regular usage of the bridge by overweight vehicles is evidence of demand for a crossing at this location suitable for vehicles over ten tons.

Figure 3: Prior Skinners Falls Bridge Vehicle Usage⁹



Enforcement of the weight limit at this bridge has proved difficult. The headache bars installed in 2016 were repeatedly vandalized. The Town of Cochecton, NY and Damascus Township, PA do not have municipal police forces, although the nearest State Police Station is in Narrowsburg, NY, approximately six miles to the south. Even now with the bridge closed to all traffic, there is evidence of pedestrian use. Other methods of enforcement, such as CCTV may be helpful in identifying offenders; however, that is likely not enough to stop illegal crossings. In the case of the Skinners Falls Bridge, the weight restrictions when the bridge was open and subsequent closure were related to critical structural integrity. The risk of catastrophic bridge failure and resulting potential loss of life, injury, property damage, and environmental impact due to illegal overweight crossings is an unacceptable risk.

⁹ <https://www.penndot.pa.gov/RegionalOffices/district-4/PublicMeetings/Wayne%20County/Documents/Skinners%20Falls%20Bridge%20Public%20Meeting%20Presentation.pdf>

River Road, Calkins Road, and Milanville Road in Wayne County, PA, are posted for ten tons. Although these roadways have narrow lanes and winding curves, the road posting does not necessarily mean the road is unsafe for or cannot physically accommodate heavy trucks. Rather, it is a mechanism that requires haulers to be financially responsible for added maintenance on the roadways they use through bonding, permits, or agreements. The existing roadway section is posted because it was not constructed to withstand continuous use from heavier vehicles that exceed the posting. In addition, emergency vehicles, school buses, and others traveling to or from residences, commercial establishments or farms along the posted roadway are exempt from the state's bonding weight limits. Per PennDOT policy, the connecting roadway network and any existing roadway postings should not influence the bridge posting. Therefore, a weight posting on the connecting Pennsylvania roadways does not necessitate a weight limit on the Skinners Falls Bridge. Thus, the Skinners Falls Bridge Project possesses logical termini and has independent utility (i.e. the project would be useable and reasonable even if no additional transportation improvements in the area are made).

River Road, Milanville Road, and Calkins Road are not identified on the National Intercity Truck Network¹⁰, which is a network of highways for large trucks to access interstate highways. These roads must meet certain geometric requirements for safe operations (sight distance, minimum grades, pavement width, clearances, and intersection geometry). Large truck usage of the connecting Pennsylvania roadways will continue to be managed through the load posting limits and bonding requirements.

6. **Environmental Impact:** Commenters expressed concerns about potential impacts to various environmental resources, including the Upper Delaware Scenic and Recreational River, visual environment, historic resources, water quality, wildlife habitat, noise, and property values.

Response: PennDOT, NYSDOT, and FHWA are fully committed to following the principles and procedures outlined in the National Environmental Policy Act (NEPA), Section 106 of the National Historic Preservation Act, Section 4(f) of the Department of Transportation Act, Section 7 of the Wild and Scenic Rivers Act, and the other federal and state laws and regulations that apply to this transportation project.

Cooperating Agencies (i.e., an agency with jurisdiction by law and/or special expertise with respect to environmental issues) and Participating Agencies (i.e., any federal, state, or local agency that may have an interest in the project) have been briefed on the project and the Draft P&N through Agency Coordination Meetings. Additionally, the project team plans to formalize the participation of the Cooperating and Participating Agencies. The agencies will be invited to formally participate in the Planning and Environmental Linkages (PEL) Study and future NEPA review processes. The project team is committed to working with the resource agencies to develop and evaluate alternatives that avoid and minimize impacts to environmental and cultural resources to the greatest extent practicable. Mitigation will be considered for any unavoidable environmental impacts.

Environmental and cultural resource impacts of alternatives will be assessed and fully evaluated in a future NEPA document, including impacts to surrounding properties, land use, traffic, safety, visual environment, noise, air quality, the Upper Delaware Scenic and Recreational River, historic resources, protected species, and other cultural and

¹⁰ PennDOT, 2018. *Publication 411, Pennsylvania STAA Truck Routes for 102" Wide Trailers.*

environmental resources. Alternatives under consideration will be evaluated on how well they meet the project P&N as well as balance the impacts to the resources in the area. Public input will be an important component through the development and evaluation of alternatives. Public involvement will be conducted in accordance with PennDOT's *Project Level Public Involvement Handbook*¹¹ and pursuant to 23 CFR 771.111, 40 CFR 1500-1508, and 23 USC 139.

7. **Tourism:** Commenters noted the bridge is important for local tourism and economy, including tourism specifically centered on the Bridge's historic character, and this should be included in the P&N statement.

Response: PennDOT, NYSDOT, and FHWA recognize there is a need for a crossing to support tourism and recreation. The historic nature of Skinners Falls Bridge is not identified on any publicly available tourism plans, guides, or documents from the National Park Service, Upper Delaware Council, Upper Delaware Scenic Byway, Delaware River Water Trail, or state, regional, or county tourism associations. There are no historical markers on either side of the bridge to call attention to the historic significance of the bridge to passersby. Without these local tourism plans and markers from local agencies, PennDOT, NYSDOT, and FHWA cannot designate the historic character of the bridge as a tourism need. Needs related to the local economy and recreation are included in the Draft P&N.

8. **Industry:** Commenters disagreed that commerce would suffer any negative impacts by keeping the bridge "as is" since no major industry currently relies on crossing it."

Response: The Skinners Falls Bridge Draft P&N does not cite major industry as a need. As stated in the Draft P&N, "An operational bridge is needed for local commerce," including the small businesses noted in the Draft P&N.

9. **Public Involvement Process:** Commenters stated the P&N statement is deficient because it does not reflect what the local public wants, and public opinions offered during the initial public survey period held March 30, 2021 through June 1, 2021 have not been included or addressed in a comprehensive summary document.

Response: PennDOT, NYSDOT, and FHWA are committed to following the public involvement requirements outlined in 23 CFR 450 and 23 USC 168 throughout the Skinners Falls Bridge Planning and Environmental Linkages (PEL) Study and Draft P&N document. To date, consistent with the federal regulations and requirements, PennDOT has offered multiple opportunities for the Project Advisory Committee, stakeholders, local municipalities, and public to provide input to the PEL Study and Draft P&N. The P&N must reflect the needs of roadway users.

The March 30 through June 1, 2021 public survey was held to solicit input regarding needs from the local community and was not related to a specific action or document review. No formal comment response is required. A summary of the public survey results was prepared and posted to the project webpage¹². Additionally, prevalent comments or questions received from the public during this survey period were incorporated into the project's

¹¹ PennDOT, 2021. *Publication 295, Project Level Public Involvement Handbook*.

¹² <https://www.penndot.pa.gov/RegionalOffices/district-4/PublicMeetings/Wayne%20County/Documents/Survey%20SummaryR7.pdf>

frequently asked questions document also available on the project webpage¹³. Public feedback received during this time was considered and utilized in the development of the Draft P&N.

The Draft P&N was available for public review and comment from December 8, 2021 through February 7, 2022. PennDOT, NYSDOT, and FHWA have considered the comments received and prepared this Draft P&N Comment Response Report. The P&N will not be adopted and approved until the public and agencies have had an opportunity to review and comment on the Draft P&N.

Public involvement is an ongoing process and will continue throughout the Skinners Falls Bridge PEL Study and into the National Environmental Policy Act process. The public will be invited to review and comment on the future Skinners Falls Bridge PEL Study Report and other technical study results and environmental documents.

10. **Land Use:** *The surrounding area is rural, quiet, and primarily residential; the P&N statement should reflect the existing land use, community setting, and minimal commercial development. Conversely, one respondent noted that the community need for growth through strong infrastructure improvements should be accounted for in the P&N statement.*

Response: County comprehensive plans and development plans were reviewed during preparation of the Draft P&N. Review of these planning documents identified no significant current or planned growth in the project area. Development is further limited through the *Upper Delaware Scenic and Recreational River Final River Management Plan*¹⁴. Moreover, preservation of open space in the Delaware River corridor was emphasized. The Draft P&N is consistent with the surrounding existing land use, focuses on needs specific to the local community, and does not cite future growth or economic development as needs. As alternatives are developed and evaluated, land use context will be a factor in selecting an alternative.

11. **Support:** *Several comments expressed support for aspects of the P&N statement, including providing a safe crossing, the need for residential, business, and emergency response uses, and the need for bicycle and pedestrian accommodations.*

Response: Safe passage for vehicles, bicyclists, and pedestrians is part of the project purpose. Residential, business, recreational, and emergency response needs are included in the Draft P&N statement.

12. **Time:** *A timely resolution is needed.*

Response: PennDOT, NYSDOT, and FHWA are designing a compact schedule in compliance with Section 106, the National Environmental Policy Act (NEPA), Section 4(f), the Wild and Scenic Rivers Act, Chapter 105/Section 404 permitting, and their associated regulations. The project team has engaged in the Planning and Environmental Linkages (PEL) Study to accelerate the project delivery process. Continued progress is contingent on availability of funding. Next steps include additional technical studies and alternatives

¹³ <https://www.penndot.pa.gov/RegionalOffices/district-4/PublicMeetings/Wayne%20County/Documents/SFB%20Draft6%20FAQs%2020210521.docx.pdf>

¹⁴ https://upperdelawarecouncil.org/wp-content/uploads/Upper_Delaware_River_Management_Plan_1986_updated_2015.pdf

development as part of the PEL Study followed by evaluation of alternatives and environmental assessment as part of the NEPA phase. Additional details regarding PennDOT's project delivery process can be found in *Design Manual Part 1, Transportation Program Development and Project Delivery Process*¹⁵.

13. **Maintenance:** *Inadequate maintenance and neglect of the Skinners Falls Bridge has contributed to the status of the bridge.*

Response: PennDOT has performed regular maintenance and inspection of the Skinners Falls Bridge as required by federal and state regulations. Since 1971 there have been five rehabilitation or emergency repair projects. Bridge inspections have followed the National Bridge Inspection Standards.

14. **NPS Designation:** *Commenters noted the Upper Delaware Scenic and Recreational River was designated as a unit of the National Park Service (NPS) in 1978.*

Response: The P&N statement has been revised accordingly.

Responses to Specific Comments

The comments below do not fall within the topics discussed in the previous section; therefore, they are discussed individually. Comment excerpts are organized alphabetically by last name or organization name and date submitted.

Ballew, C., 12/09/21, Attachment 1: *"...very few busses transport from one side of the river to the other. Pa busses transport students down the PA side as does the NY busses...they do not cross over."*

Response: The project team investigated bus routes while preparing the Draft P&N. No bus routes were identified in the project area; therefore, buses are not included in the Draft P&N.

Ballew, C., 1/07/22, Attachment 1: *"Did not see strong advocacy for pedestrian traffic, though it was mentioned."*

Response: Pedestrians are included in the Draft P&N due to public feedback received during the March 30 – June 1, 2021 public survey period. In addition, potential pedestrian generators, such as the nearby residences, Lander's River Trips, and Skinners Falls public river access, were identified on either side of bridge. There are currently no trails or sidewalks that connect with or cross over the bridge.

Crum, A., 1/03/22, Attachment 1: *"I think is funny that you talk about the 11.6 mile detour down River Road yet the actual route that is posted for the Skinners Falls Bridge detour takes up Milanville Road almost to Beach Lake then down Rt 652 to the Narrowburg bridge. This is a much looker [sic] route but I guess you didn't feel River Road was safe so posted the Milanville Road as the detour"*

¹⁵ PennDOT, 2021. *Publication 10, Design Manual Part 1, Transportation Program and Project Delivery Process, November 2015 Edition, December 2021 Change No. 3.*

Response: The official detour route is posted from SR 1002 (Calkins Road) to SR 1004 (Milanville Road) to SR 1008 (Plank Road) to the Narrowsburg Bridge and to SR 97 in New York. The Draft P&N describes alternate routes that are likely used by the local community.

Damascus Citizens for Sustainability (DCS), 02/07/22, Attachment 2: *“Please see and acknowledge reception of this email and that you can open the two attachments.” “We are providing these comments and survey responses again...” “We are providing these previous letters from DCS and those from other entities again...”*

Response: PennDOT acknowledges the receipt of the two referenced attachments. One attachment contains email comments from private citizens collected by DCS and submitted during the initial public survey period held March 30 – June 1, 2021. The second attachment contains previous letters from DCS and other entities.

These comments and letters have already been considered in the development of the Draft P&N. Many individuals who submitted comments during the March 30 – June 1, 2021 public survey period have also submitted comments on the Draft P&N. Comments originating from the Draft P&N public comment period have been reviewed, addressed herein and in the revised P&N statement, and included in Attachments 1-3. Considering the specific intent and context of comments and letters originally submitted during previous public survey periods, these comments and letters are neither detailed in this Draft P&N comment response report nor included in the attachments.

Dexter, L. and J., 02/07/22, Attachment 1: *“Page 3, paragraph 3. Bill Case Polaris Sales is located in Pike County. The most efficient way for for them to access customers in New York is to cross at Narrowsburg.”*

Response: PennDOT, NYSDOT, and FHWA consider the information provided by the owner of Bill Case Polaris Sales and Service and stated in the Draft P&N as credible.

Lewis, C., 02/03/22, Attachment 1: *“Some modicum of diligence was required with respect to the commercial ramifications of the bridge, and the emergency response organizations on the Pennsylvania side of the Delaware — exactly how is this possible for an agency that actually originates from the Pennsylvania side of the Delaware, funded by Pennsylvania taxpayers?”*

Response: The Skinners Falls Bridge is owned by the New York-Pennsylvania Joint Interstate Bridge Commission; therefore, the New York and Pennsylvania transportation departments are working together on this project. The Skinners Falls Bridge Project is being undertaken by PennDOT in cooperation with the New York State Department of Transportation and with independent federal oversight from the Federal Highway Administration, which ensures the required due diligence is completed.

Lewis, C., 02/03/22, Attachment 1: *“Your document conflates the function of the bridge before closing with some imagined need for some super structure that will magically be a boom to these chosen businesses and ergo, the local economy as a whole. Each of those cited businesses (several of them seasonal in nature) files and [sic] income tax return, and the data for the costs and benefits to those business can only be weighed against bottome [sic] lines expressed and reported based upon said tax returns, in honesty. Where is that supporting data? In the instance of Polaris (Case) the question should be asked, what the market saturation is for snowmobiles — exactly how many people across from Milanville have, or intend to buy snowmobiles? This concern is located nearer the Narrowsburg Bridge crossing, not the*

Milanville crossing. How many people do they employ? What impact does each business cited have on the local aggregate economy, in dollar amounts? Who is the largest employer along this stretch of the Delaware? Woodblock [sic] Pines? Woodloch Pines has been adversely impacted by the closure of Peggy Runway on the PA side since October — as have numerous businesses in Narrowsburg, and in aggregate these business contribute far more, year round, to the local economy than the few you cite.”

Response: The project team interviewed local business owners and considers their input as stated in the P&N statement as credible. PennDOT does not make need determinations based on an entity’s income or taxes paid.

State Route 1006/Peggy Runway Road is a separate project.

Lewis, C., 02/03/22, Attachment 1: *“One wonders exactly who will be awarded the contracts, given the degree of obfuscation in the document’s approach and wording.”*

Response: Future contracts related to the Skinners Falls Bridge will be awarded fairly and equitably according to PennDOT policy, state law, and federal law.

National Park Service, 01/07/22, Attachment 3: *“Please change ‘Upper Delaware National Park Service’ to ‘Upper Delaware Scenic and Recreational River’ on page 3. The use of the term ‘recreation area’ on page 4, section 3, is mis-leading. The bridge happens to be located within a recreational segment of the Wild and Scenic River, but it is not appropriate to call the entire river corridor a ‘recreation area’. It may be more clear to state that ‘This section of river protected under the Wild and Scenic Rivers Act and managed by the NPS, saw an average of.....”*

Response: The Draft P&N has been revised as suggested.

Osnick, E., 01/04/22, Attachment 1: *“Additional coordination should take place with local businesses that supply durable goods, fuel, etc.”*

Response: Numerous local businesses were interviewed, or interviews were attempted with local businesses during preparation of the Draft P&N.

Osnick, E., 01/04/22, Attachment 1: *“ADT numbers should be broken down by month.”*

Response: More detailed average daily traffic (ADT) numbers are not available for the Skinners Falls Bridge. See Figure 3 for available historic vehicle volume data.

Ryan, C., 12/31/21, Attachment 1: *“I think the need for redundancy is key. What happens of the bridges to the north and south have issues? It is only time I am sure.”*

Response: While redundancy is certainly helpful in a transportation network, this would be considered a secondary need. Secondary needs are not included in the Draft P&N at this time.

Starr, N., 01/07/22, Attachment 1: *“Actual use of the bridge, before it was closed, is not clearly delineated.”*

Response: As detailed in the Draft P&N, the Skinners Falls Bridge was primarily used by residents, businesses, recreational users, and emergency responders; modes of travel included personal vehicles, emergency response vehicles that met the weight postings, overweight trucks, bicyclists, and pedestrians. See Figure 3 for available historic vehicle volume data.

Starr, N., 02/01/22 and 02/07/22, Attachment 1: *“The increased travel times due to the bridge closure presented in this section are misleading. These are the times required to get from one side of the Skinners Falls Bridge to the other when the bridge is closed. For many trips, the increased travel times will be significantly less. For others (eg from Milanville to Callicoon), there will be no increased travel time. Any argument based on increased travel times should be based on the actual increases, not the maximum possible increase.”*

Response: Travel times reported in the Draft P&N are the times required to get from one side to the other. PennDOT, NYSDOT, and FHWA must consider users that have origins and destinations directly on opposite sides of the bridge.

Starr, N., 02/04/22, Attachment 1: *“The Skinners Falls Bridge is not ideal for pedestrians and bicyclists, but, due to the low traffic volume at this location, has adequately served their needs for years. I have walked across the bridge many times and never had a problem with traffic. I have been in this area for over 30 years and do not know of any local residents who have had a problem crossing the bridge by either foot or bike.”*

Response: There is no reported history of injury or crashes involving bicyclists or pedestrians at the bridge location. Potential solutions will consider the safety of bicyclists and pedestrians on low-volume roads.

Starr, R., 02/05/22, Attachment 1: *“Please find the attach mp3 audio comments by Ed Wesely regarding the Skinners Falls Bridge” [Audio recording is a copy of Ed Wesely’s (now deceased) interview about the history of bridge and Milanville area, which was recorded January 2020 at the WJFF radio studio.]*

Response: The audio attachment was received. The project team appreciates the additional historical information.

Upper Delaware Council, 01/06/22, Attachment 2: *“It states, “Additionally, the bridge, when open to traffic, did not provide adequate bike and pedestrian accommodations.” The term “adequate” is not defined. As a single-lane bridge with timber running boards, it’s true that there is no sidewalk or designated bike lane; however, there is easy sight distance for the 466.9-foot length of the bridge and clearance to move out of the way of the one oncoming vehicle able to cross at any given time. Therefore, we regard this as potentially prejudicial and a non-issue.”*

Response: As stated in the Draft P&N, the current bridge configuration consists of a single lane with timber running boards that restrict a vehicle’s lane position and where all modes of traffic must share the only travel lane. Regardless of sight distance, the existing bridge configuration does not meet PennDOT’s¹⁶, NYSDOT’s, or FHWA’s design criteria for safe

¹⁶ PennDOT design criteria can be found in *Publication 13M, Design Manual Part 2, Highway Design, March 2015 Edition, December 2021 Change No. 7* and *Publication 13, Design Manual Part 2, Contextual Roadway Design*.

bicycle and pedestrian facilities. To alleviate confusion, the sentence referenced in the above comment has been stricken from the P&N.

Upper Delaware Council, 01/12/22, Attachment 2: *“As a supplement to the Upper Delaware Council’s comment letter below, we attach this illustrated booklet prepared in 2017 by the late Ed Wesely - former Milanville resident, writer, educator, and photographer - to highlight the historical and cultural context of the Milanville- Skinners Falls Bridge. Thank you.”*

Response: The illustrated booklet was received. The project team appreciates the additional historical information.

Wolff, E., 01/09/22, Attachment 1: *“No mention of motorcycle use.”*

Response: PennDOT, NYSDOT, and FHWA investigated transportation uses and needs of the Skinners Falls Bridge during the development of the Draft P&N. The project team is not aware of data supporting frequent motorcycle usage or needs at the Skinners Falls Bridge; therefore, it is not specifically mentioned in the Draft P&N.

ATTACHMENT 1

Public Citizen Comments

Comments are arranged alphabetically by commenter's last name.
Certain personal information has been redacted.

#42 Patricia Aakre

COMPLETE

Collector: Web Link 1 (Web Link)
 Started: Friday, January 07, 2022 11:50:04 PM
 Last Modified: Monday, January 10, 2022 12:40:16 PM
 Time Spent: Over a day
 IP Address: [REDACTED]

Please refer to the Responses to the Most Frequently Submitted Comments for the following topics: **Support, Large Trucks, Emergency Response, Historic Preservation**

Page 3

Q1

After reading the draft Purpose and Need statements, do these statements identify or clearly express the transportation purpose and need(s) for the Skinners Falls Bridge? (choose one)

Yes, the transportation purpose and need(s) are clearly identified or expressed.

Q2

After reading the draft Purpose and Need statements, are there other transportation purpose(s) or need(s) not identified for the Skinners Falls Bridge? (choose one)

There are transportation purpose(s) or need(s) that have not been identified (please use space below to explain).

Please use space below to provide more information if you replied "No" to question two.:

Even though it is clear that the bridge needs to be repaired and restored for use by pedestrians, cars, and small emergency vehicles, it is not clear that the weight limit needs to be quadrupled from nine tons to 40. Why can't we keep the bridge as close to its historic self as possible? The ten ton limit seems right, to account for emergency vehicles, which before were not restricted when the bridge was set to hold a weight of nine tons. The statement that declares large emergency vehicles are necessary does not support that statement with data of how as a result of the bridge not being able to bear that weight, people were kept from receiving medical assistance in a timely manner.

Q3

Please use the space below to share any other comments or concerns about the transportation draft Purpose and Need document.

I appreciate the work being done to look ahead at future needs of the community served by the bridge. But this bridge has historical significance, and should be treated like a landmark with an eye toward serving its main purpose: transportation of people, bicycles, small cars, not big trucks hauling cargo.

Q4

Which of the following best describes your interest in the project? (May select more than one option)

**Resident,
Property Owner**

Q5

Please provide the following information to ensure your comment is considered in the study

First Name and Last Name	Patricia Aakre
Address (Optional)	████████████████████
City/Town	Damascus
State	PA
Postal Code	18415
Email Address	████████████████████
Phone Number (Optional)	████████████████

#5 Colette Ballew

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Thursday, December 09, 2021 10:04:02 AM
Last Modified: Thursday, December 09, 2021 10:10:02 AM
Time Spent: 00:05:59
IP Address: [REDACTED]

Please refer to Responses to Specific Comments and Responses to the Most Frequently Submitted Comments for the following topics: **Support, Emergency Response, Large Trucks**

Page 3

Q1

After reading the draft Purpose and Need statements, do these statements identify or clearly express the transportation purpose and need(s) for the Skinners Falls Bridge? (choose one)

Yes, the transportation purpose and need(s) are clearly identified or expressed.

Q2

After reading the draft Purpose and Need statements, are there other transportation purpose(s) or need(s) not identified for the Skinners Falls Bridge? (choose one)

The transportation purpose(s) and need(s) have been identified.

Q3

Please use the space below to share any other comments or concerns about the transportation draft Purpose and Need document.

I understand the need for emergency vehicles but very few busses transport from one side of the river to the other. Pa busses transport students down the PA side as does the NY busses...they do not cross over. Fire depts on the other had are different as are ambulances, it depends on who gets the call or the size of the emergency. They do cross over and help each other...so that my have to be taken into consideration. But other truck traffic is not as needed to pass through the bridge.

Q4

Resident

Which of the following best describes your interest in the project? (May select more than one option)

Q5

Please provide the following information to ensure your comment is considered in the study

First Name and Last Name	Colette Ballew
Address (Optional)	██████████
City/Town	Damascus
State	PA
Postal Code	18415
Email Address	██████████

Colette Ballew

From: colette ballew <[REDACTED]>
Sent: Tuesday, January 4, 2022 5:20 PM
To: Williams, Susan (PENNDOT) <[REDACTED]>
Subject: [External] Skinners Falls Bridge

Please refer to the Responses to the Most Frequently Submitted Comments for the following topics: ***Alternatives, Public Involvement Process, Large Trucks, Safety, Historic Preservation***

Good evening,

I have written many times before to various other officials about this concern in my community, so today I am addressing you with my concerns.

The Skinners Falls Bridge is slated to be replaced and the controversy is over whether it should remain a single lane or become a 40ton bridge that no one in the community wants, truly.

The bridge represents the historic flavor of Milanville and keeps the traffic crossing it to mostly local. It does not need to be a modern new bridge to accommodate large trucks that have no business being on the local roads that are limited to 10 ton restrictions. Yes it might not be the conventional way to go, but having the treasure of the historic connection to hamlet makes the area worth visiting. Keeping it smaller makes it safer for all concerned on the river, meaning the roads that do not get maintained well enough are not already over used.

The survey was rigged to get the answers that DOT wanted not what the community wanted. When the community is asked, almost all say they would prefer to maintain the bridge in its single lane capacity to maintain the historic integrity of the area.

I hope that you take into consideration the wishes of the community to maintain the single lane bridge and fix it soon. Not having 5e bridge has caused hardship for the whole community, especially since the Cocheton bridge is under construction and the Callicoon bridge is soon to be.

Thank you for your attention.
Colette Ballew
Damascus, PA

#34 Colette Ballew

COMPLETE

Collector: Web Link 1 (Web Link)
 Started: Friday, January 07, 2022 3:16:05 PM
 Last Modified: Friday, January 07, 2022 3:20:42 PM
 Time Spent: 00:04:36
 IP Address: [REDACTED]

Please refer to Responses to Specific Comments and Responses to the Most Frequently Submitted Comments for the following topics: **Large Trucks, Historic Preservation, Alternatives**

Page 3

Q1

After reading the draft Purpose and Need statements, do these statements identify or clearly express the transportation purpose and need(s) for the Skinners Falls Bridge? (choose one)

No, the transportation purpose and need(s) aren't clearly identified or expressed (please use space below to explain).

,
 Please use space below to provide more information if you replied "No" to question one.:
 There is no need for 40ton access to bridge. Roads leading to bridge limit access to 10tons.

Q2

After reading the draft Purpose and Need statements, are there other transportation purpose(s) or need(s) not identified for the Skinners Falls Bridge? (choose one)

There are transportation purpose(s) or need(s) that have not been identified (please use space below to explain).

,
 Please use space below to provide more information if you replied "No" to question two.:
 Did not see strong advocacy for pedestrian traffic, though it was mentioned.

Q3

Please use the space below to share any other comments or concerns about the transportation draft Purpose and Need document.

It is a bridge that connects two states over the river that divides them. Keeping it within the historic guidelines would be more appropriate than changing it to the modern version DOT suggests.

Q4

Which of the following best describes your interest in the project? (May select more than one option)

**Resident,
 Property Owner**

Q5

Please provide the following information to ensure your comment is considered in the study

First Name and Last Name	Colette Ballew
Address (Optional)	████████████████████
City/Town	Damascus
State	PA
Postal Code	18415
Email Address	████████████████████
Phone Number (Optional)	██████████

#46 Jesse Ballew

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, January 12, 2022 6:50:32 PM
Last Modified: Wednesday, January 12, 2022 6:53:38 PM
Time Spent: 00:03:06
IP Address: [REDACTED]

Please refer to the Responses to the Most Frequently Submitted Comments for the following topics: **Alternatives, Public Involvement Process, Historic Preservation**

Page 3

Q1

After reading the draft Purpose and Need statements, do these statements identify or clearly express the transportation purpose and need(s) for the Skinners Falls Bridge? (choose one)

No, the transportation purpose and need(s) aren't clearly identified or expressed (please use space below to explain).

,
 Please use space below to provide more information if you replied "No" to question one.:
 the community is not in favor of a 40ton limit 2 lane bridge, which is what DOT has stated is needed in the area.

Q2

After reading the draft Purpose and Need statements, are there other transportation purpose(s) or need(s) not identified for the Skinners Falls Bridge? (choose one)

The transportation purpose(s) and need(s) have been identified.

Q3

Please use the space below to share any other comments or concerns about the transportation draft Purpose and Need document.

I just wish DOT of both NY and PA would listen to the community and restore the bridge to its single status keeping with the historic nature of the Milanville community.

Q4

Which of the following best describes your interest in the project? (May select more than one option)

Resident,
Property Owner

Q5

Please provide the following information to ensure your comment is considered in the study

First Name and Last Name	Jesse Ballew
Address (Optional)	████████████████████
City/Town	Damascus
State	PA
Postal Code	18415
Email Address	████████████████████
Phone Number (Optional)	██████████

Please refer to the Responses to the Most Frequently Submitted Comments for the following topics: ***Alternatives, Historic Preservation, Public Involvement Process, Large Trucks, Land Use, Time, Emergency Response***

James W. Barth

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

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

Dear Ms. Williams,

After reading the draft *Skinners Falls Bridge Project Purpose and Need Statement*, it seems abundantly clear that the goal of this proposed PenDot project is to replace the existing historic, and perfectly functional design, with a contemporary, two lane concrete and steel structure, despite the fact that the original design has served our community exceedingly well for the past 120 years, and is broadly recognized for its historic value. The fact that the National Park Service recognizes this, and supports the restoration of the original structure, speaks volumes.

The goal and reasoning of the draft *Skinners Falls Bridge Project and Need Statement* are not supported by reality. The vast majority of residents in the Milanville (and surrounding area) are opposed to such an enlarged bridge replacement. Residents do not want the heavy truck traffic and larger amounts of vehicular traffic it would invite, and that most of the roads in Damascus Township cannot support.

Such a contemporary replacement bridge is not required by the commercial needs of the area, both current, and foreseeable. It is not supported by a need for increased emergency response to that section of Damascus Township.

A contemporary, two lane bridge would be a massive waste of taxpayer money, and would put a further delay on the completion of the Skinners Falls Bridge Project that would last a few more years. This Project would have already been completed if the original design, with improvements, had been performed. Instead, residents are without any crossing at Skinners Falls since October of 2019 until ...?

A contemporary design replacement bridge is a solution to problems that do not exist.

Emergency Response:

How is it possible that the *Purpose and Need Document* lists response by the Lake Huntington Volunteer Fire Department as a primary reason for such a bridge replacement, when LHVFD has never had such heavy truck access, and, has never been the primary responder to that area of Damascus? It is true that Google Maps lists the distance of the LHVFD to the NYS side of Skinners Falls as 4.2 miles, but it also estimates a driving time of 8 minutes from that firehouse. Where do the volunteer fire fighters live in Sullivan County? What is their response time to the alarms?

How is it possible that the document doesn't even list the Beach Lake Fire Company, which I would consider to be the primary responder to a fire in that area of Damascus. That fire station has a direct route via 652 to Atco to the Milanville Road, or simply by the Milanville Road taken from Beach Lake. The mileage is listed as 7.4 miles and the driving time as 11 minutes to the Milanville General Store.

What happens when the fire is up or down River Road from Milanville, or, on Calkins road, or, MacCubbins road? MacCubbins is 3.7 miles down River Road, and the driving time from the Milanville General Store is listed at 9 minutes. The LHVFD does not enter that equation.

The Beach Lake Volunteer Fire Company is the closest to handle the vast majority of fire emergencies in that part of Damascus Township, with assistance from the Welcome Lake Volunteer Company, the Narrowsburg Volunteer Fire Company, and the Equinunk Volunteer Fire Company.

Ambulance service is not an issue. Damascus Volunteer Ambulance Service, along with the Tusten Volunteer Ambulance Service, both provide great coverage and emergency response. Most pertinent to the Skinners Falls Bridge Project issue is that the original, historic design accommodates the weight of ambulances.

Commercial Need:

Existing need connected to local commerce does not require a two lane bridge as PenDot proposes. I can't imagine what future commercial development the authors of this Draft Proposal envision, especially when the residents are overwhelmingly opposed to this bridge proposal, and such a bridge contradicts the character of the historic Milanville district.

The Need part of the Document mentions Bill Case Polaris (ATV and snowmobile sales), located over 10 miles away at 408 Welcome Lake Road, as an example of commercial need for such a contemporary bridge at Skinners Falls? I live 2.2 miles closer than Mr. Case to Narrowsburg on Welcome Lake Road, and a little over 2

miles from the Narrowsburg Bridge. What compelling business need for a contemporary design, two way bridge at Skinners Falls is there, when we already have the Narrowsburg Bridge to NYS Route 97 (55mph) for points North?

There is simply no existing, compelling commercial need for such a contemporary bridge design at Skinners Falls, and there is no compelling need to create such a bridge based upon unstated, unknown, future commercial development in our area.

The Upper Delaware Council unanimously (and that is difficult to achieve) stands in opposition to the replacement of the Historic design of the Skinners Falls Bridge, as well as in opposition to the false reasons stated as “need” in the draft Document. Please reread the UDC letter dated January 6, 2022 signed by the UDC Chairperson, Andrew Boyar.

Damascus Citizens for Sustainability also stands strongly in opposition to this proposal, and in support of the restoration of the Historic Bridge structure.

Who exactly supports the contemporary two way replacement bridge, and, what is the compelling case they make?

As a tax paying property owner in Berlin Township, Wayne County for the past 33 years, as a primary resident at this location for the past 19 years, and as a former member of the Welcome Lake Volunteer Fire Company for four years, I respectfully request that the authorities in charge of this Project listen to, and respect, the overwhelming responses in opposition to the goal expressed in the Draft Skinners Falls Bridge Document.

Sincerely,

James W. Barth

[REDACTED]

Beach Lake, Pa. 18405

[REDACTED]

#43 Helen Beichel

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Thursday, December 09, 2021 4:22:14 PM
Last Modified: Monday, January 10, 2022 4:22:15 PM
Time Spent: Over a month
IP Address: [REDACTED]

Please refer to the Responses to the Most Frequently Submitted Comments for the following topics: **Large Trucks, Alternatives**

Page 3

Q1

After reading the draft Purpose and Need statements, do these statements identify or clearly express the transportation purpose and need(s) for the Skinners Falls Bridge? (choose one)

No, the transportation purpose and need(s) aren't clearly identified or expressed (please use space below to explain).

,
 Please use space below to provide more information if you replied "No" to question one.:
 The current draft says "Every traffic count completed by PennDOT since 1998 has identified vehicles over ten tons (in excess of the original capacity of the bridge) using the Skinners Falls Bridge, with vehicles possibly in excess of 40 tons recorded crossing the bridge despite the weight posting and the headache bars, which were often vandalized to allow larger vehicles to cross. Regular usage of the bridge by overweight vehicles demonstrates a need to provide a crossing that is suitable for vehicles over ten tons." This statement proves PennDOT seeking justification for a larger bridge. The ILLEGAL and inappropriate usage of the bridge DOES NOT show a NEED. It is merely proof of ILLEGAL activity. It is shocking and shameful that PennDOT condones this activity. Other bridges and roads can and should handle these loads. The need is on those roads and bridges and PENN DOT needs to maintain appropriate funding for those roads and bridges.

Q2

After reading the draft Purpose and Need statements, are there other transportation purpose(s) or need(s) not identified for the Skinners Falls Bridge? (choose one)

There are transportation purpose(s) or need(s) that have not been identified (please use space below to explain).

,
 Please use space below to provide more information if you replied "No" to question two.:
 The need to keep the bridge as it is but repaired is not part of the document.

Q3

Please use the space below to share any other comments or concerns about the transportation draft Purpose and Need document.

We can currently ride bicycles and walk over the bridge both when it was open and now. There is no need for additional lanes.

Q4

Resident

Which of the following best describes your interest in the project? (May select more than one option)

Q5

Please provide the following information to ensure your comment is considered in the study

First Name and Last Name	Helen Beichel
Address (Optional)	██████████
City/Town	Cochecton
State	NY
Postal Code	12726
Email Address	████████████████████
Phone Number (Optional)	██████████

#51 Rose Biondi

COMPLETE

Collector: Web Link 1 (Web Link)
 Started: Friday, January 07, 2022 1:43:15 PM
 Last Modified: Monday, February 07, 2022 4:05:59 PM
 Time Spent: Over a week
 IP Address: [REDACTED]

Please refer to the Responses to the Most Frequently Submitted Comments for the following topics: **Large Trucks, Emergency Response, Land Use, Alternatives**

Page 3

Q1

After reading the draft Purpose and Need statements, do these statements identify or clearly express the transportation purpose and need(s) for the Skinners Falls Bridge? (choose one)

No, the transportation purpose and need(s) aren't clearly identified or expressed (please use space below to explain).

,
 Please use space below to provide more information if you replied "No" to question one.:
 Document appears to skew the needs toward accommodating 10+ ton vehicles. Reality is that most of traffic is less. Trucks and emergency vehicle could and should use two other adjoining bridges. The current River Road between skinners and Narrowsburg does not allow passage of 10 + ton eight wheelers.

Q2

After reading the draft Purpose and Need statements, are there other transportation purpose(s) or need(s) not identified for the Skinners Falls Bridge? (choose one)

There are transportation purpose(s) or need(s) that have not been identified (please use space below to explain).

,
 Please use space below to provide more information if you replied "No" to question two.:
 Transportation conducive to adjoining roads and surrounding area, which is rural, quiet.

Q3

Please use the space below to share any other comments or concerns about the transportation draft Purpose and Need document.

Find this survey skewed toward a rebuild rather than renovation.

Q4

Which of the following best describes your interest in the project? (May select more than one option)

**Resident,
 Property Owner**

Q5

Please provide the following information to ensure your comment is considered in the study

First Name and Last Name	Rose Biondi
Address (Optional)	████████████████████
City/Town	Milanville
State	PA
Postal Code	18443
Email Address	████████████████████
Phone Number (Optional)	██████████

Rose Biondi

From: Rose Biondi <[REDACTED]>
Sent: Monday, February 7, 2022 5:17 PM
To: Williams, Susan (PENNDOT) <[REDACTED]>
Subject: [External] Skinners Falls, NY - Milanville, PA Bridge Public Comment on Draft Purpose and Need Document

Please refer to the Responses to the Most Frequently Submitted Comments for the following topics: **Safety, Land Use, Large Trucks, Emergency Response, Public Involvement Process, Alternatives, Historic Preservation, Tourism, Maintenance**

February 7th, 2022

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

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

Dear Ms. Williams,

I am a full time resident of the Upper Delaware River Valley. Living on the PA side I have used the Milanville Skinners Falls Bridge frequently. We use as an alternate route to NY destinations and as a part of my regular walks or runs.

I have filled out the survey, but since I find survey skewed toward a rebuild verses a restoration and the purpose and need document void of key points/topics, I find it necessary to also send these comments.

1.Document appears to be void of consideration of public safety. It does not consider the current location of bridge and surrounding are, which is rural, residential and quiet.

2. Survey skewed toward rebuild focusing on use by larger vehicles such as trucks and emergency vehicles. Both have always used alternate routes which are both supported by roads accommodating heavier loads. Fact is that the River Road between Narrowsburg and Skinners, which is basically a lane and a half cannot handle the larger weighted or sized vehicles. Also using the continued violation of weight restrictions as a reason to replace is absurd. Enforcement and surveillance makes more sense.

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

4. Public Safety. Nowhere in the document is mentioned the danger to those using the recreational campground on the north side of the Bridge, and the DEC River Access on the south side. Larger, wider bridges seem to encourage higher speeds.

5. Statement regarding economic benefits needs to be updated stating that the picturesque historic bridge is a special added amenity for the campground, livery businesses, general store, gas station, and Bed and Breakfast inn that operate in the immediate vicinity.

6. The Purpose and Need document states that “The Skinners Falls Bridge, in its current condition, does not provide access across the river for recreational vehicles and trailers for recreational boating, fishing, camping, and shopping. It did before. Unfortunately inadequate maintenance created the mess we are facing.

The draft Purpose and Need Statement must objectively reflect the true will of public input and information gathered from the study, which, in its current form, it does not.

Best regards,
Rose Biondi, Resident
[REDACTED]
[REDACTED]
Milanville, PA 18443
[REDACTED]

#9 Joanne Wasserman Brinkerhoff

COMPLETE

Collector: Web Link 1 (Web Link)
 Started: Thursday, December 09, 2021 7:45:14 PM
 Last Modified: Thursday, December 09, 2021 8:06:20 PM
 Time Spent: 00:21:06
 IP Address: [REDACTED]

Please refer to the Responses to the Most Frequently Submitted Comments for the following topics: **Historic Preservation, Alternatives, Large Trucks, Emergency Response, Environmental Impact**

Page 3

Q1

After reading the draft Purpose and Need statements, do these statements identify or clearly express the transportation purpose and need(s) for the Skinners Falls Bridge? (choose one)

Yes, the transportation purpose and need(s) are clearly identified or expressed.

Q2

After reading the draft Purpose and Need statements, are there other transportation purpose(s) or need(s) not identified for the Skinners Falls Bridge? (choose one)

There are transportation purpose(s) or need(s) that have not been identified (please use space below to explain).

Please use space below to provide more information if you replied "No" to question two.:

In addition to specific day-to-day "needs", the current bridge is a beautiful, historic landmark that is the heart of the Skinners Falls/Milanville rural community. We should preserve the unique cultural significance of the Upper Delaware scenic and recreation river corridor by repairing/restoring the existing bridge and bringing it back to it's rightful purpose. We don't need a modern, 2 lane bridge for vehicles over 10 tons. The roads on the Milanville side are not properly graded and cannot support a heavy commercial traffic flow through this quiet, small, pristine rural community. To do so would be extremely hazardous. Most emergency vehicles can still use the bridge with a 10 ton limit. There are also many environmental concerns with a large construction project on a nationally protected scenic and recreational river.

Q3

Please use the space below to share any other comments or concerns about the transportation draft Purpose and Need document.

I believe I said it all above. We want our bridge back, the way it was--nothing more, nothing less.

Q4

Which of the following best describes your interest in the project? (May select more than one option)

- Resident,**
 - Business owner,**
 - Property Owner**
-

Q5

Please provide the following information to ensure your comment is considered in the study

First Name and Last Name	Joanne Wasserman Brinkerhoff
Address (Optional)	██████████
City/Town	Milanville
State	PA
Postal Code	18443
Email Address	██
Phone Number (Optional)	██████████

#50 Roger Brinkerhoff

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Monday, January 03, 2022 2:38:15 PM
Last Modified: Monday, February 07, 2022 3:09:07 PM
Time Spent: Over a month
IP Address: [REDACTED]

Please refer to the Responses to the Most Frequently Submitted Comments for the following topics: **Support, Historic Preservation**

Page 3

Q1

After reading the draft Purpose and Need statements, do these statements identify or clearly express the transportation purpose and need(s) for the Skinners Falls Bridge? (choose one)

Yes, the transportation purpose and need(s) are clearly identified or expressed.

,
 Please use space below to provide more information if you replied "No" to question one.:
 Respondent left this blank.

Q2

After reading the draft Purpose and Need statements, are there other transportation purpose(s) or need(s) not identified for the Skinners Falls Bridge? (choose one)

The transportation purpose(s) and need(s) have been identified.

,
 Please use space below to provide more information if you replied "No" to question two.:
 Respondent left this blank.

Q3

Please use the space below to share any other comments or concerns about the transportation draft Purpose and Need document.

I operate an in-home psychotherapy practice in Milanville. Although due to the Covid-19 pandemic, I am not seeing clients in-person, I will be returning to in-person sessions once the pandemic is more manageable. A majority of my clients live in New York, mostly in Sullivan County. The Skinners Falls Bridge is by far the easiest route for them to take to get to my office. I must also stress the importance, to all of us, of the heritage that is represented by that beautiful old bridge.

Q4

Which of the following best describes your interest in the project? (May select more than one option)

Resident,
Business owner

Q5

Please provide the following information to ensure your comment is considered in the study

First Name and Last Name	Roger Brinkerhoff
Address (Optional)	██████████
City/Town	Milanville
State	PA
Postal Code	18443
Email Address	██
Phone Number (Optional)	██████████

#49 Barbara Buckman

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Monday, January 03, 2022 2:45:19 PM
Last Modified: Monday, February 07, 2022 3:04:45 PM
Time Spent: Over a month
IP Address: [REDACTED]

Please refer to the Responses to the Most Frequently Submitted Comments for the following topic: **Support**

Page 3

Q1

After reading the draft Purpose and Need statements, do these statements identify or clearly express the transportation purpose and need(s) for the Skinners Falls Bridge? (choose one)

Yes, the transportation purpose and need(s) are clearly identified or expressed.

,
 Please use space below to provide more information if you replied "No" to question one.:
 Respondent left this blank.

Q2

After reading the draft Purpose and Need statements, are there other transportation purpose(s) or need(s) not identified for the Skinners Falls Bridge? (choose one)

There are transportation purpose(s) or need(s) that have not been identified (please use space below to explain).

,
 Please use space below to provide more information if you replied "No" to question two.:
 Firemen & fire Police also respond in there own cars & trucks when there dept. is called

Q3

Please use the space below to share any other comments or concerns about the transportation draft Purpose and Need document.

Respondent skipped this question

Q4

Which of the following best describes your interest in the project? (May select more than one option)

Resident,
Emergency Responder,
Property Owner

Q5

Please provide the following information to ensure your comment is considered in the study

First Name and Last Name	Barbara Buckman
Address (Optional)	██████████
City/Town	Narrowsburg
State	NY
Postal Code	12764
Email Address	██████████
Phone Number (Optional)	██████████

Nina Burleigh

From: Nina Burleigh <[REDACTED]>
Sent: Saturday, February 5, 2022 3:29 PM
To: [REDACTED]
Cc: Skinners Falls Bridge
Subject: [EXTERNAL] Skinners falls bridge

Please refer to the Responses to the Most Frequently Submitted Comments for the following topics: ***Alternatives, Historic Preservation, Large Trucks, Emergency Response, Tourism, Land Use, Environmental Impact***

Hello

I am writing to support maintaining and restoring the one lane bridge.

I am a journalist, and I write for the New York Times and other publications as well as books. The destruction of this historic bridge for the recently created and I believe specious cause of needing a modern bridge to accommodate heavy trucks or emergency vehicles would be a tragedy for the flavor or the community and its attraction to tourists as a rustic, glorious and unspoiled section of the Delaware river.

I have owned a house within walking distance for over 20 years. I have never heard of anyone in the vicinity needing emergency care and having been denied it because a vehicle couldn't reach them. This is not a valid or I believe even meaningful reason for destroying it.

If heavy trucks for future industrial activity need to use our roads the bridges at Narrowsburg and Cochecton are sufficient and always have been.

Please consider the quality of life, tourism, history and environment before tearing it down.

Thank you
Nina Burleigh

[REDACTED]

[REDACTED]

Nina Burleigh

From: Nina Burleigh <[REDACTED]>
Sent: Monday, February 7, 2022 10:00 AM
To: Skinners Falls Bridge
Subject: [EXTERNAL] LETTER IN SUPPORT OF OLD SKINNERS

Please refer to the Responses to the Most Frequently Submitted Comments for the following topics: ***Alternatives, Historic Preservation, Large Trucks, Emergency Response, Tourism, Land Use, Environmental Impact***

Resending since it did not get through to Susan Williams - who has posted only a part of her email address. Please disseminate.

To Whom it May Concern:

I am a local author and journalist, published in the New York Times and elsewhere. I am writing to support maintaining and restoring the historic Skinners Falls one-lane bridge. The destruction of this bridge for the recently created and, I believe, specious cause of needing a new, modern bridge to accommodate heavy trucks or emergency vehicles would be a tragedy for the community and seriously diminish its attraction to tourists as a rustic, glorious and unspoiled section of the Delaware river.

I have owned a house within walking distance of the bridge for over 20 years. I have stood on it countless times and watched sunrises, sunsets, fog, fish, swallows swooping, with no car traffic breaking the peace and silence. It is hardly a lot to ask people to occasionally wait their turn in a car before crossing the river at this point. I have never heard of anyone in the vicinity needing emergency care and having been denied it because a vehicle couldn't reach them. If heavy trucks for future industrial activity need to use our roads, the bridges at Narrowsburg and Cohecton are sufficient and always have been. Please consider the quality of life, tourism, history, and environment before tearing it down.

Nina Burleigh

#52 Christine Chorney

COMPLETE

Collector: Web Link 1 (Web Link)
 Started: Monday, February 07, 2022 7:03:52 PM
 Last Modified: Monday, February 07, 2022 7:26:52 PM
 Time Spent: 00:22:59
 IP Address: [REDACTED]

Please refer to the Responses to the Most Frequently Submitted Comments for the following topics: **Historic Preservation, Land Use, Large Trucks, Alternatives, Safety**

Page 3

Q1

After reading the draft Purpose and Need statements, do these statements identify or clearly express the transportation purpose and need(s) for the Skinners Falls Bridge? (choose one)

Yes, the transportation purpose and need(s) are clearly identified or expressed.

Q2

After reading the draft Purpose and Need statements, are there other transportation purpose(s) or need(s) not identified for the Skinners Falls Bridge? (choose one)

The transportation purpose(s) and need(s) have been identified.

Q3

Please use the space below to share any other comments or concerns about the transportation draft Purpose and Need document.

The bridge is a historical and aesthetic treasure that fits into the rural landscape of the surrounding area. This value should be maintained and not made subservient to large commercial interests. They can use the bridges at Callicoon or Narrowsburg. Please repair and keep this bridge as close to the original construction as safely possible.

Q4

Which of the following best describes your interest in the project? (May select more than one option)

Property Owner,
Visitor

Q5

Please provide the following information to ensure your comment is considered in the study

First Name and Last Name **Christine Chorney**
 City/Town **Beach Lake**
 State **PA**
 Postal Code **18405**
 Email Address [REDACTED]

#8 jay corriveau

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Thursday, December 09, 2021 11:22:04 AM
Last Modified: Thursday, December 09, 2021 12:28:15 PM
Time Spent: 01:06:11
IP Address: [REDACTED]

Please refer to the Responses to the Most Frequently Submitted Comments for the following topics:
Emergency Response, Large Trucks

Q1

After reading the draft Purpose and Need statements, do these statements identify or clearly express the transportation purpose and need(s) for the Skinners Falls Bridge? (choose one)

No, the transportation purpose and need(s) aren't clearly identified or expressed (please use space below to explain).

Please use space below to provide more information if you replied "No" to question one.:

The transportation needs are not accurately expressed in the Purpose and Need statements. Throughout the document is the suggestion that the area needs a larger bridge at Skinners Falls when in truth there are two more than adequate bridges above and below this bridge. The EMS services mentioned are in another state altogether and only relevant when mutual aid is needed. The Beach Lake Fire company is only 7 miles from the bridge. The Damascus Volunteer Ambulance Corps is only 5 miles from the bridge. The Purpose and Need statements inaccurately imply that the New York emergency services are primary emergency services for the area, which they are not. They would only be involved for mutual aid after primary and other secondary resources in Pennsylvania were used, which is infrequently. Is an additional ten minutes of response time, in the case of Lake Huntington, for a mutual aid company very relevant when that company is a third or fourth mutual aid call? Unlikely. The NPS response is presented as if NPS do not currently have good access to the river from their Milanville station. They do have excellent access to the river from their station in Milanville. Yes, the NY side of the river has poor access, but this is much less relevant given that a) NPS is on the PA side already and b) the PA side has excellent access along the entire, relatively narrow river near Skinners Falls. There are also four excellent boat launch areas both above (Cochecton and Damascus) and below (Narrowsburg and Beach Lake/Hansdale and Delaware Turnpike) Additionally, the supporting roads on each side of the bridge are not adequate for significantly increased vehicle loads. This subject is not considered here, but is relevant because a larger bridge with heavier loads would carry vehicles with the supporting feeder roads could not support. There is no point "upgrading" the bridge when the roads leading to and from the bridge cannot support large vehicles. Therefore, there is an unexpressed "purpose and need" to serve the surrounding roads appropriately.

Q2

After reading the draft Purpose and Need statements, are there other transportation purpose(s) or need(s) not identified for the Skinners Falls Bridge? (choose one)

There are transportation purpose(s) or need(s) that have not been identified (please use space below to explain).

Please use space below to provide more information if you replied "No" to question two.:

The transportation needs are not accurately expressed in the Purpose and Need statements. Throughout the document is the suggestion that the area needs a larger bridge at Skinners Falls when in truth there are two more than adequate bridges above and below this bridge. The EMS services mentioned are in another state altogether and only relevant when mutual aid is needed. The Beach Lake Fire company is only 7 miles from the bridge. The Damascus Volunteer Ambulance Corps is only 5 miles from the bridge. The Purpose and Need statements inaccurately imply that the New York emergency services are primary emergency services for the area, which they are not. They would only be involved for mutual aid after primary and other secondary resources in Pennsylvania were used, which is infrequently. Is an additional ten minutes of response time, in the case of Lake Huntington, for a mutual aid company very relevant when that company is a third or fourth mutual aid call? Unlikely. The NPS response is presented as if NPS do not currently have good access to the river from their Milanville station. They do have excellent access to the river from their station in Milanville. Yes, the NY side of the river has poor access, but this is much less relevant given that a) NPS is on the PA side already and b) the PA side has excellent access along the entire, relatively narrow river near Skinners Falls. There are also four excellent boat launch areas both above (Cochecton and Damascus) and below (Narrowsburg and Beach Lake/Hansdale and Delaware Turnpike) Additionally, the supporting roads on each side of the bridge are not adequate for significantly increased vehicle loads. This subject is not considered here, but is relevant because a larger bridge with heavier loads would carry vehicles with the supporting feeder roads could not support. There is no point "upgrading" the bridge when the roads leading to and from the bridge cannot support large vehicles. Therefore, there is an unexpressed "purpose and need" to serve the surrounding roads appropriately.

Q3

Please use the space below to share any other comments or concerns about the transportation draft Purpose and Need document.

The transportation needs are not accurately expressed in the Purpose and Need statements. Throughout the document is the suggestion that the area needs a larger bridge at Skinners Falls when in truth there are two more than adequate bridges above and below this bridge. The EMS services mentioned are in another state altogether and only relevant when mutual aid is needed. The Beach Lake Fire company is only 7 miles from the bridge. The Damascus Volunteer Ambulance Corps is only 5 miles from the bridge. The Purpose and Need statements inaccurately imply that the New York emergency services are primary emergency services for the area, which they are not. They would only be involved for mutual aid after primary and other secondary resources in Pennsylvania were used, which is infrequently. Is an additional ten minutes of response time, in the case of Lake Huntington, for a mutual aid company very relevant when that company is a third or fourth mutual aid call? Unlikely. The NPS response is presented as if NPS do not currently have good access to the river from their Milanville station. They do have excellent access to the river from their station in Milanville. Yes, the NY side of the river has poor access, but this is much less relevant given that a) NPS is on the PA side already and b) the PA side has excellent access along the entire, relatively narrow river near Skinners Falls. There are also four excellent boat launch areas both above (Cochecton and Damascus) and below (Narrowsburg and Beach Lake/Hansdale and Delaware Turnpike) Additionally, the supporting roads on each side of the bridge are not adequate for significantly increased vehicle loads. This subject is not considered here, but is relevant because a larger bridge with heavier loads would carry vehicles with the supporting feeder roads could not support. There is no point "upgrading" the bridge when the roads leading to and from the bridge cannot support large vehicles. Therefore, there is an unexpressed "purpose and need" to serve the surrounding roads appropriately.

Q4

Which of the following best describes your interest in the project? (May select more than one option)

**Resident,
Emergency Responder**

Q5

Please provide the following information to ensure your comment is considered in the study

First Name and Last Name	jay corriveau
Address (Optional)	[REDACTED]
City/Town	damascus
State	PA
Postal Code	18415
Email Address	[REDACTED]
Phone Number (Optional)	[REDACTED]

#47 Rebekah Creshkoff

COMPLETE

Collector: Web Link 1 (Web Link)
 Started: Tuesday, February 01, 2022 11:56:09 AM
 Last Modified: Wednesday, February 02, 2022 1:58:55 PM
 Time Spent: Over a day
 IP Address: [REDACTED]

Please refer to the Responses to the Most Frequently Submitted Comments for the following topics: **Large Trucks, Alternatives, Historic Preservation**

Page 3

Q1

After reading the draft Purpose and Need statements, do these statements identify or clearly express the transportation purpose and need(s) for the Skinners Falls Bridge? (choose one)

No, the transportation purpose and need(s) aren't clearly identified or expressed (please use space below to explain).

Please use space below to provide more information if you replied "No" to question one.:
 Why do you need a bridge that can support far heavier vehicles than the surrounding roads can accommodate?

Q2

After reading the draft Purpose and Need statements, are there other transportation purpose(s) or need(s) not identified for the Skinners Falls Bridge? (choose one)

There are transportation purpose(s) or need(s) that have not been identified (please use space below to explain).

Please use space below to provide more information if you replied "No" to question two.:
 The Purpose and Need statements fail to address the secondary meaning of transportation, which is "the state of being transported," as in "carried away by strong emotion; enrapture." The current bridge enraptures the public; we feel a modern replacement would fall short in this regard.

Q3

Please use the space below to share any other comments or concerns about the transportation draft Purpose and Need document.

I'm sure you have seen the arguments against replacing the bridge several hundred times by now, so I'm not going to reiterate them here. I will simply state that those of us who actually live in the Upper Delaware Valley love the old bridge. Its historic charm is part of what drew us here. It continues to draw visitors and newcomers today. We see the old bridge an asset to our community. If you replace it with a modern structure, the area will lose its historic appeal. The region will have just another river crossing — functional, yes, but with zero character. We feel the old Skinners Fall Bridge is worth investing in and implore you to do so. Thank you.

Q4

Resident

Which of the following best describes your interest in the project? (May select more than one option)

Q5

Please provide the following information to ensure your comment is considered in the study

First Name and Last Name	Rebekah Creshkoff
City/Town	Callicoon
State	NY
Postal Code	12723-5139
Email Address	[REDACTED]
Phone Number (Optional)	[REDACTED]

#26 Aileen Crum

Please refer to Responses to Specific Comments

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Monday, January 03, 2022 11:05:21 AM
Last Modified: Monday, January 03, 2022 11:14:03 AM
Time Spent: 00:08:42
IP Address: [REDACTED]

Page 3

Q1

After reading the draft Purpose and Need statements, do these statements identify or clearly express the transportation purpose and need(s) for the Skinners Falls Bridge? (choose one)

Yes, the transportation purpose and need(s) are clearly identified or expressed.

Q2

After reading the draft Purpose and Need statements, are there other transportation purpose(s) or need(s) not identified for the Skinners Falls Bridge? (choose one)

The transportation purpose(s) and need(s) have been identified.

Q3

Please use the space below to share any other comments or concerns about the transportation draft Purpose and Need document.

I think is funny that you talk about the 11.6 mile detour down River Road yet the actual route that is posted for the Skinners Falls Bridge detour takes up Milanville Road almost to Beach Lake then down Rt 652 to the Narrowburg bridge. This is a much looker route but I guess you didn't feel River Road was safe so posted the Milanville Road as the detour

Q4

Resident

Which of the following best describes your interest in the project? (May select more than one option)

Q5

Please provide the following information to ensure your comment is considered in the study

First Name and Last Name	Aileen Crum
City/Town	Milanville
State	PA
Postal Code	18443
Email Address	[REDACTED]

#53 Adam Curtis

COMPLETE

Collector: Web Link 1 (Web Link)
 Started: Monday, February 07, 2022 8:05:23 PM
 Last Modified: Monday, February 07, 2022 8:08:36 PM
 Time Spent: 00:03:13
 IP Address: [REDACTED]

Please refer to the Responses to the Most Frequently Submitted Comments for the following topic: **Alternatives**

Page 3

Q1

After reading the draft Purpose and Need statements, do these statements identify or clearly express the transportation purpose and need(s) for the Skinners Falls Bridge? (choose one)

No, the transportation purpose and need(s) aren't clearly identified or expressed (please use space below to explain).

,
Please use space below to provide more information if you replied "No" to question one.:
The study is subjectively skewed against rehabilitation of the existing bridge.

Q2

After reading the draft Purpose and Need statements, are there other transportation purpose(s) or need(s) not identified for the Skinners Falls Bridge? (choose one)

There are transportation purpose(s) or need(s) that have not been identified (please use space below to explain).

,
Please use space below to provide more information if you replied "No" to question two.:
The study is subjectively skewed against rehabilitation of the existing bridge.

Q3

Please use the space below to share any other comments or concerns about the transportation draft Purpose and Need document.

The study is subjectively skewed against rehabilitation of the existing bridge.

Q4

Resident

Which of the following best describes your interest in the project? (May select more than one option)

Q5

Please provide the following information to ensure your comment is considered in the study

First Name and Last Name

Adam Curtis

Address (Optional)

██████████

City/Town

Milanville

State

PA

Postal Code

18443

Email Address

██

#12 Paul Deppe

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Monday, December 13, 2021 12:06:08 PM
Last Modified: Monday, December 13, 2021 1:42:44 PM
Time Spent: 01:36:36
IP Address: [REDACTED]

Please refer to the Responses to the Most Frequently Submitted Comments for the following topics: **Historic Preservation, Safety, Environmental Impact**

Page 3

Q1

After reading the draft Purpose and Need statements, do these statements identify or clearly express the transportation purpose and need(s) for the Skinners Falls Bridge? (choose one)

No, the transportation purpose and need(s) aren't clearly identified or expressed (please use space below to explain).

Please use space below to provide more information if you replied "No" to question one.:
I was not present at meeting 2 on September 23, but of the four "topics of concern" noted on slide 23 of the slide deck and the overwhelming public responses from email and survey, the need of Historic Preservation is missing from the Purpose and Need statement. This is an important need and the related survey categories of Traffic Calming, Aesthetics/Quality of Life all rank highest of public remarks noted in slide 24. I urge the PEL to incorporate this fourth need into the Purpose and Need statement as it is equally paramount to the other needs of the community.

Q2

After reading the draft Purpose and Need statements, are there other transportation purpose(s) or need(s) not identified for the Skinners Falls Bridge? (choose one)

There are transportation purpose(s) or need(s) that have not been identified (please use space below to explain).

Please use space below to provide more information if you replied "No" to question two.:
Noted in question one, the need of Historic Preservation is not identified or incorporated into the Purpose and Need statement even though it has received the majority of public community comments and support.

Q3

Please use the space below to share any other comments or concerns about the transportation draft Purpose and Need document.

Historic Preservation may not be a direct transportation need, but it is a fundamental need towards defining the transportation purpose that must not be lost, diminished or overlooked thru the process especially in light of the communities overwhelming response to its importance.

Q4

Which of the following best describes your interest in the project? (May select more than one option)

**Resident,
Property Owner,
Visitor**

Q5

Please provide the following information to ensure your comment is considered in the study

First Name and Last Name	Paul Deppe
Address (Optional)	[REDACTED]
City/Town	Hancock
State	NY
Postal Code	13783
Email Address	[REDACTED]

#18 Gary Dexter

COMPLETE

Please refer to the Responses to the Most Frequently Submitted Comments for the following topic: **Support**

Collector: Web Link 1 (Web Link)
Started: Saturday, December 18, 2021 9:35:33 PM
Last Modified: Saturday, December 18, 2021 9:42:04 PM
Time Spent: 00:06:31
IP Address: [REDACTED]

Page 3

Q1

After reading the draft Purpose and Need statements, do these statements identify or clearly express the transportation purpose and need(s) for the Skinners Falls Bridge? (choose one)

Yes, the transportation purpose and need(s) are clearly identified or expressed.

Q2

After reading the draft Purpose and Need statements, are there other transportation purpose(s) or need(s) not identified for the Skinners Falls Bridge? (choose one)

The transportation purpose(s) and need(s) have been identified.

Q3

Please use the space below to share any other comments or concerns about the transportation draft Purpose and Need document.

My Mom lives on Atco Road in PA and recently needed emergency medical attention. Emts came from Lake Huntington who were unable to use the Skinners Falls bridge which would have been quicker to get to her. She was taken to the emergency room and is now home. The Skinners Falls bridge needs to be fixed/repared/replaced for emergency services of various types to be able to get to their destination faster.

Q4

Which of the following best describes your interest in the project? (May select more than one option)

Visitor,
Other

Q5

Please provide the following information to ensure your comment is considered in the study

First Name and Last Name	Gary Dexter
Address (Optional)	██████████
City/Town	Kingston
State	NY
Postal Code	12401
Email Address	████████████████████
Phone Number (Optional)	██████████

Linda and Jeff Dexter

From: Linda and Jeff Dexter <[REDACTED]>
Sent: Monday, February 7, 2022 1:17 PM
To: Skinners Falls Bridge; [REDACTED]
Subject: [EXTERNAL] Comments on Draft Purpose and Needs Document

Attn: Susan Williams --Penn DOT District 4-0

Neil Shemo, P.E. --AECOM

Comments will be referenced by page and paragraph number.

Please refer to Responses to Specific Comments and Responses to the Most Frequently Submitted Comments for the following topics: **Alternatives, Large Trucks, Emergency Response, Safety, Historic Preservation**

Page 1/paragraph 6. After laying out the cultural and historic values of Skinners Falls Bridge, the Purpose states the project is to "provide a safe efficient crossing of the Delaware River for cars, trucks, trailers..." Since this bridge was never intended to carry the weight loads of modern trucks and trailers it would seem that it is already been decided that this bridge crossing will have to be a much larger bridge capable of carrying modern large truck trailers without consideration, if this type of bridge is needed at this location. Given that these large vehicles were never allowed to cross at this location, why are existing routes of traffic no longer adequate? The current bridge thus could be to be rehabilitated for its traditional use for local traffic and light weight commercial and emergency vehicles.

Page 2/Footnote 5. "River Road is posted for ten tons." The roadway posting is in place to reduce excess damage and subsequent excess maintenance and repair caused by heavy truck loads. The River Road posting does not mean the road is unsafe for or cannot physically accommodate heavy trucks... Really? Either the road can handle 10 tons or it cannot. Remove the posting if the road can handle the load. If there is a concern that heavy truck and trailer loads cause excessive and/or accelerated damage, why does it make any sense at all to build a large bridge which would allow heavy loads onto the three Pennsylvania roads that come together at the Skinners Falls Bridge? Beyond that, these three roads feature a narrow roadway, virtually no shoulder. There are sections where rock outcroppings can be found at one edge of the pavement, while at the other side are guardrails that set at the edge of the pavement. These are frequently found on blind curves where neither lane of traffic can see on coming traffic. And add in sections where erosion has left bare guard rail posts hanging in the air. Why in heavens name do you think its a good idea to build a replacement bridge allowing an increase of heavy truck loads onto these existing roads? For the most part the major restrictions/deficiencies have not been repaired in the 70 years I have used these roads. Why should I think this will be suddenly be remedied? It is not possible for a large tractor trailer to turn on onto River Road going to Narrowsburg after crossing the River from New York. The road through Milanville to the Skinners Falls Bridge is so narrow, it would be foolish to build a bridge large enough to accommodate tractor trailer traffic. Widening of the road would destroy the main body of Milanville.

Page 3, paragraph 3. Bill Case Polaris Sales is located in Pike County. The most efficient way for for them to access customers in New York is to cross at Narrowsburg.

Page 3, paragraph 4. You reference to the fact that "some vehicles exceeding the weight limit cross at Skinners Falls is a reason for establishing a large capacity bridge". Actually it points out that a camera system should be installed to identify and cite irresponsible users. The technology exists and has been in use all across the nation.

Page 3 Emergency Response.....The Skinners Falls bridge has never been used by large emergency vehicles. It would be invaluable for ambulances to be able to cross, as the designated helicopter landing site for the NYS side of Skinners Falls is at the NPS Ranger Station in Milanville PA. Ambulance response from Pennsylvania is from Tyler Hill. If the incident is located on the NYS side of Skinners Falls, the fastest response time will be to cross at Damascus and travel on NYS

97. There is very limited river access from Pennsylvania. The primary location for medical incidents is the Skinners Falls campground and falls access, located in New York. The best route for the closest response from Beach Lake Fire Department is to cross the River at Narrowsburg. Again, the Pennsylvania road system along this stretch of the Delaware is narrow, not conducive for large vehicle traffic.

Page 4, paragraph 4. This bridge is a low volume bridge designed for light vehicle use. The primary failure to provide safe pedestrian and bicycle traffic lies with Penn Dot and the driving surface they installed and failed to maintain that force vehicle traffic to use the center of the portion of the bridge, not allowing wide clearance for pedestrian and bicycle traffic. I have walked across and bicycled across that bridge since the 1950's, possibly more than most people, and have never had an issue with sharing the bridge travel surface prior to its current configuration.

Page 4, Paragraph 4, last sentence. The sentence comments ...does not provide access for recreational vehicles and trailers for recreational boating, fishing, camping, and shopping.... All the campgrounds in this area are located on the NYS side, most of the users are from the NYC urban area and hence use NYS RT 97. And the vast majority of users are camping in tents. The Upper Delaware River is very shallow, there are only a few isolated areas where a boat with a motor can be operated (none are near the Skinners Falls Bridge). A light capacity, low volume bridge will fit these needs adequately.

Your document scarcely comments on this being a very unique bridge structure. Certainly not every old bridge can be saved. However, the fact that it is one of very few of its class that remains in service, stands for keeping this one in use. The low volume bridge fits the community it serves. Its design fits the historic community it is set in, unlike anything else that could replace it. The roads that lead up to the Bridge are unfit for the heavy traffic that the document refers to. It is my understanding that the company that built the Skinners Falls bridge, The American Bridge Company "is a heavy/civil construction firm that specializes in building and renovating bridges...." is still in business in Coraopolis, Pennsylvania. I have never seen any reference that this company has been contacted in regards to their ideas on its rehabilitation.

Sincerely,

Jeff and Linda Dexter

[REDACTED]

Beach Lake, Pennsylvania 18405

[REDACTED]

Shari Drewett

From: Shari <[REDACTED]>
Sent: Sunday, February 6, 2022 2:22 PM
To: Skinners Falls Bridge
Subject: [EXTERNAL] Skinnersfalls bridge

Please refer to the Responses to the Most Frequently Submitted Comments for the following topics:
Large Trucks, Historic Preservation

To whom it may concern:

The indisputable fact is that all roads leading to the bridge from NY or PA are inadequate in size or weight limit (10 tons) to accommodate larger/heavier vehicles. The road on NY side cannot be widened because of the railroad crossing, and on the PA side, the nature of the roads/terrain does not allow a 40 ton tractor trailer to make necessary turns or travel safely, and the roads can only accommodate 10 ton maximum weight.

Also, the bridges represent the history of the area and are beautiful to behold.

Thank you for considering,

Shari Drewett

Sent from my iPhone

Ianthe Dugan

From: Ianthe <[REDACTED]>
Sent: Monday, February 7, 2022 12:08 PM
To: [REDACTED] Skinners Falls Bridge
Subject: [EXTERNAL] Our Beloved Skinners Falls Bridge

Please refer to the Responses to the Most Frequently Submitted Comments for the following topics:
Historic Preservation, Alternatives, Emergency Response, Large Trucks, Tourism, Land Use

We are long-time residents of Milanville, Pennsylvania, with a historic home next to the historic Skinners Falls one-lane bridge. Our home, in fact, was built by the namesake Skinners, and, like the bridge, is on the National Register of Historic Places. I am writing to strongly support maintaining and restoring our beloved one-lane Skinners Falls bridge.

First of all, there is no need for a modern wider bridge. It sits in a sparsely populated residential area with limited traffic. Occasionally, a car waits its turn before slowly crossing the river. Emergency vehicles can easily cross. I have never heard of anybody who was deprived of emergency care due to the bridge. If bigger industrial trucks need to cross the river, they can do what they've always done - drive over the nearby bridges at Narrowsburg and Cochection. There is no need for expansion.

The rustic bridge is an important tourist draw and a reining symbol of Pennsylvania's history. Visitors ramble through the trails along the river, watching the fog and the famous "Skinners" falls. There's a campground where people sleep outside in tents. Day visitors, along with campers, launch tubes, canoes and kayaks and other non-motorized vessels. People slowly drive across the bridge, while pedestrians stand on the bridge marveling at the fog, the fish jumping, the non-motorized vessels floating peacefully underneath. The community and visitors adore this bridge and flock to this area to see the famous bridge and its environs.

The history of the bridge is an integral part of the history of the region. Like our home, it is on the National Register of Historic Places. These are rare gems that are part of the heart and soul of America, and it is an honor being the steward of such a treasure. We carefully preserve our home, just steps away from the bridge, and even keep our home painted the historic yellow color in deference to the roots of the community, of Pennsylvania and of our country. The bridge, our home, the campground, the falls are all named for the prominent Skinner family, which in the 1700s pioneered the idea of rafting lumber down the river, and operated a ferry. In 1902, the bridge opened. It is among a handful in Sullivan County bridges on the National Register of Historic Places, along with such prized structures as the Roebling Aqueduct.

Once you cross this precious little bridge, a sign announces, right in front of our home, "Welcome to Pennsylvania." The bridge is representative of what is beautiful about Pennsylvania, an enduring symbol of the state's delicate balance between industry and environment, preservation and progress. The charming rustic one-lane bridge is an important emblem of the glorious, unspoiled, charm of this idyllic section of the Delaware river and, more broadly, of the state's stewardship of the environment and historic structures.

We urge you, with all due respect, to reinforce and preserve the existing bridge. To rip it down and replace with a new modern bridge would destroy the very aspects that make the Upper Delaware River area so attractive. Reinforcing and preserving this unique landmark would stand out in history as an example of what Pennsylvania does right.

Sincerely,

The Dugan family, Milanville Pennsylvania

Marianne Dugan

From: Marianne Dugan <[REDACTED]>
Sent: Monday, February 7, 2022 4:24 PM
To: [REDACTED] Skinners Falls Bridge
Subject: [EXTERNAL] Skinners Falls Bridge

Please refer to the Responses to the Most Frequently Submitted Comments for the following topics: ***Historic Preservation, Alternatives***

Hello -- Although I live on the west coast, I am writing about the Skinners Falls Bridge, because my mother owns the beautiful historic Skinner house. My sister Ianthe Dugan emailed you today a much more eloquent letter than I will be able to provide, but I support and agree with her comments wholeheartedly.

My family and I have loved visiting Milanville ever since my mother bought the Skinner House some time in the early 1990s. We used to drive over the Skinners Falls bridge to get there, as it was the most direct route when traveling from New York City after getting off the plane. We loved the rustic nature and aesthetic beauty of the bridge.

We were very saddened the first time we arrived to find the bridge closed; we assumed it was temporary. We then learned over time that it did not appear the bridge would reopen. This has meant longer, and less scenic, travel time for my mother and her visitors to get to and from her home.

I remember opening up a book about the Clean Water Act, and one of the few photographs in the book was Skinners Falls, which was presented as the epitome of the types of waterways that are being protected under the Act. When people walk or drive over the Skinners Falls bridge, they are able to see the Delaware River in its full beauty, because of the open structure of the bridge and the fact that one must drive slowly over its short length. I cannot imagine a two-lane bridge there, especially of the modern style that cuts off the views of the river while driving.

I urge that the bridge be kept in its current style and size, and reinforced or rebuilt (with a focus on the wood that makes it so quaint and beautiful) so that it can be reopened.

--

Marianne Dugan, Attorney
she/hers

[REDACTED]
Eugene, OR 97401
[REDACTED]
[REDACTED]
[REDACTED]

“Learn from the mistakes of others. You can’t live long enough to make them all yourself.” - Eleanor Roosevelt

(I am no longer taking cases in my solo practice, just wrapping up old ones -- and am now a full-time staff attorney for Civil Liberties Defense Center, but this email is not sent in my CLDC capacity, and the views, words, and opinions herein are neither on behalf of nor endorsed by the Civil Liberties Defense Center).

Julietta Eisenberg

From: Julietta Eisenberg <[REDACTED]>
Sent: Thursday, February 3, 2022 5:47 PM
To: Williams, Susan (PENNDOT) <[REDACTED]>
Cc: AECOM <[REDACTED]>
<

Please refer to Responses to Specific Comments and Responses to the Most Frequently Submitted Comments for the following topics: **Large Trucks, Tourism, Safety, Alternatives, Emergency Response, Public Involvement Process, Historic Preservation, Land Use, NPS Designation, Industry**

Subject: Skinners Falls, NY Milanville, PA Bridge Public Comment on Draft Purpose and Need Document

February 3, 2022

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

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

Dear Ms. Williams,

I am a resident of the Upper Delaware River Valley. I have used the Milanville Skinners Falls Bridge to regularly meet family and friends beneath this beautiful structure. It is an essential part of the river valley. I have commented previously on the absurdity of building a 40-ton bridge to access twisting, winding 10-ton limit roads, as well as the harm to our way of life and the loss of tourist dollars that detracting from bridge-adjacent natural beauty would inevitably cause. Following are my additional comments to specifically address the Purpose and Needs document released on Dec 8.

Note Paragraph 4 regarding **Public Safety**.

I specifically request a complete answer to this question. Why was this issue not on your survey?

1. Lack of accuracy or objectivity; I find your study to be subjectively skewed against rehabilitation of the existing 1902 bridge through faulty assumptions and glaring omissions. The Purpose and Need document's intent is to establish a rationale for the proposed transportation improvement project and outline the facts that justify it. As stated on your comment form, it "will drive the process for alternatives consideration, inform the environmental analysis and support the alternative selection process." Therefore, its contents and tone will play a critical role in decision-making over the fate of the Skinners Falls-Milanville Bridge that has been indefinitely closed to all usage since October 16, 2019.

2. Emergency vehicle access; The one-sentence draft Purpose, which reads: "The purpose of this project is to provide a safe and efficient crossing of the Delaware River at Skinners Falls for cars, trucks, emergency response vehicles, bicyclists, and pedestrians."

It is highly presumptuous to include "emergency response vehicles" as a definitive Purpose component. The document later states that local emergency response vehicles weigh in the range of 15-31 tons for certain fire trucks. Considering that the single-lane bridge was constructed with a 9-ton weight limit, reduced to a 7-ton posting in 2007 and further downgraded to 4 tons in 2013, declaring that category of vehicle as a required use appears to set an unachievable standard of inadequacy for the bridge's restoration to its original capacity from the very first sentence. However, note that when this project's Planning and Environmental Linkages (PEL) public survey asked the question, "Beyond your personal usage, what types of vehicles/users need to have access to the bridge to meet local needs?", respondents prioritized: 1. Personal cars or trucks; 2. Pedestrians; 3.

Bicycles; 4. Ambulances; and 5. Small Delivery Vehicles. The three types of usage least selected were: 6. Recreational Vehicles/Boat Trailers; 7. Large Trucks/Fire Trucks/Tractor Trailers; and 8. Buses. Clearly not every possible use of this bridge is deemed appropriate or necessary for this location served by weight-posted roads. Emergency responders in the Upper Delaware River Valley have made reasonable accommodations over the bridge's 118-year existence to use modern two-lane concrete alternatives at short distances away in Narrowsburg and Cochection rather than this 13-foot-wide, timber plank deck crossing. **NOTE; The National Park Service has used the Bridge for emergency response, and finds the ten ton weight limit adequate for its needs.**

3. No summary document indicating the public's concerns.

The draft document offers these three Needs statements:

1. The Skinners Falls Bridge is currently closed to traffic due to its condition, which limits efficient access for residents, businesses, and recreational users.

2. Emergency response is negatively affected by the absence of a functional bridge in the vicinity of [Skinners Falls](#).

3. The Skinners Falls Bridge does not provide adequate accommodations for pedestrians, bicyclists, and recreational users in the area.

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

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

4. Public Safety. Nowhere in your document do you address the danger to those using the recreational campground on the north side of the Bridge, and the DEC River Access on the south side. Thousands of people visit this area each summer as measured by National Park Service visitor statistics. Families with small children regularly cross from the campground to the access. Encouraging larger vehicles to cross at higher speeds creates an extremely dangerous situation. Do you propose to close the Campground? I want an answer to this question.

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

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

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

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

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

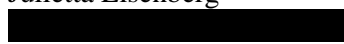
Further, regarding **emergency services**, ambulances average 5-7 tons. Most firefighters in this area respond directly to the scenes of emergencies using their personal vehicles. In discussing the Narrowsburg Fire Department’s occasional mutual aid service to the Milanville vicinity, the document states,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

Lastly, the Purpose and Need document states that “The Skinners Falls Bridge, in its current condition, does not provide access across the river for recreational vehicles and trailers for recreational boating, fishing, camping, and shopping.” The previously referenced survey results debunk the idea that this is considered to be an issue that needs fixing. The fact is that the existing bridge allows for SAFE.

I reiterate my opposition to any alternative that would eliminate this crossing or replace it with a standard-issue new bridge. I understand this rare design to be one of only three such truss types among 135 highway bridges owned by PennDOT that has not been demolished as of 2019. “Minimization and mitigation of cultural and environmental impacts” would be achieved through restoring and maintaining the current bridge. A plaque commemorating it once you’ve unnecessarily destroyed it is at best farcical and at worst an insulting attempt at subterfuge. You have ample opportunity to save this treasured historic gem that already adequately fulfills the transportation needs of the people and places that it serves.

The draft Purpose and Need Statement must accurately and objectively reflect the true will of public input and all of the information gathered from the study. If it does, it must come to one conclusion: to restore the bridge: NOT to replace it.

Sincerely,
Julietta Eisenberg


Cohecton, NY 12726

Erin Feely-Nahem

To: Williams, Susan (PENNDOT) <[REDACTED]>; AECOM <[REDACTED]>; Congressman Antonio Delgado <[REDACTED]>

Cc: Erin Feely-Nahem <[REDACTED]>

Subject: Skinners Falls, NY-Milanville PA Bridge Public Comment on Draft Purpose and Need Document

Hello,

Please see the attached letter regarding the Public Comment on Draft Purpose and Need Document for the Skinners Falls bridge project.

As a resident of Cochecton who lives on Skinners falls West Rd I hope you will hear my concerns and make a fair decision concerning your decision to rehabilitate our beautiful, historic bridge. My understanding is that this is the last bridge of this kind, in PA/NY and we would like to keep it. It is historic and brings a unique beauty to our little hamlet.

Thank you,

Erin Feely-Nahem., LMSW

[REDACTED]

Cochecton

Narrowsburg, N.Y 12764

Please refer to Responses to Specific Comments and Responses to the Most Frequently Submitted Comments for the following topics: ***Historic Preservation, Alternatives, Land Use, Large Trucks, Environmental Impact, Public Involvement Process, Emergency Response, NPS Designation, Industry, Safety***

Erin Feely-Nahem

[REDACTED]

Cochecton NY 12726

[REDACTED]

[REDACTED]

[REDACTED]

February 4, 2022

Susan Williams, Project Manager, Senior Civil Engineer

Supervisor Transportation

Pennsylvania Department of Transportation

Engineering District 4-0 Liaison Unit

55 Keystone Industrial Park

Dunmore, PA 18512-1516

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

Dear Ms. Williams,

I am a 20-year resident of the Upper Delaware River Valley. I have now retired, and live here full-time for the past several years, and pay taxes here. I have used the Milanville Skinners Falls Bridge to get to Honesdale, Beach Lake, and Milanville to shop, and regularly visit friends who live on the PA side of our bridge. I often meet family and friends beneath this beautiful structure, watching the swallows, who nest beneath this beautiful structure, or just to enjoy the river, as I watch the eagles flying above, or catching their daily meal. I think many, including myself find it an intrinsic part of the river valley. I have commented on-line previously on the ridiculous idea of building a 40-ton bridge to access twisting, winding 10-ton limit roads. I

find it difficult to believe any type of environmental study of our neighborhood would approve such a use when you consider the sometimes dangerous, narrow, winding roads we have in our area, especially on the PA side. Following are my additional comments to specifically address the Purpose and Needs document released on Dec 8 which seemed bias, and certainly didn't reflect the concerns of the homeowners and businesses in this area that I know and have spoken to.

Note Paragraph 4 regarding Public Safety

I think a complete answer to this question is necessary, when you consider the impact 40-ton vehicles will have on the roads connecting to the bridge. Is there a reason this was not on the survey?

1. Lack of accuracy or objectivity: Your study seems to be deliberately skewed against rehabilitation of the existing 1902 bridge through incorrect assumptions and blatant omissions. The Purpose and Need document's intent is not to establish a rationale for the proposed transportation improvement project and then to outline the facts that justify it. As stated on your comment form, it "will drive the process for alternatives consideration, inform the environmental analysis and support the alternative selection process." Therefore, its contents and tone will play a critical role in decision-making over the fate of the Skinners Falls-Milanville Bridge that has been indefinitely closed to all usage since October 16, 2019.

2. Emergency vehicle access; The one-sentence draft Purpose, which reads: "The purpose of this project is to provide a safe and efficient crossing of the Delaware River at Skinners Falls for cars, trucks, emergency response vehicles, bicyclists, and pedestrians." The purpose of this bridge has never been to allow 40-ton

vehicles. We have two other bridges within the area that provides this function. It is highly presumptuous to include “emergency response vehicles” as a definitive Purpose component. The document later states that local emergency response vehicles weigh in the range of 15-31 tons for certain fire trucks.

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

3. No summery document indicating the public’s concerns.

The draft document offers these three Needs statements:

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

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

The Purpose and Need document does not indicate that the highest number of recurring themes expressed by the public were: “restore/rehabilitate the bridge” (104); “bridge is a historic resource” (78); “river crossing required at this location” (66); and “quality of life; aesthetics of the area” (63). Its traffic calming effect from the absence of large trucks, and the bridge’s value for recreation and tourism were also strongly supported. I purchased my home because of the natural beauty of our area, a quiet road, (when the campgrounds are off season) which includes the river access, and the historic 1902 bridge which we love to walk, bicycle and drive over regularly, when shopping or visiting friends in Milanville.

4. Public Safety. Nowhere in your document do you address the

danger to those using the recreational campground on the north side of the Bridge, and the DEC River Access on the south side. Thousands of people visit this area each summer as measured by National Park Service visitor statistics. Families with small children and animal companions regularly cross from the campground to the access. Encouraging larger vehicles to cross at higher speeds creates an extremely dangerous situation.

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

Part of the unique nature of our community focuses on the historic existence of this pin-connected Baltimore truss bridge, which is the only one left in New York state. The bridges qualification for state and national historic recognition, the story it tells, the visitors it attracts, the uniqueness of its ornamentation, and its perfect fit into the rural setting, feel that the historical and cultural significance of the Skinners Falls-Milanville Bridge rises to the level of a Need for protection. Many similar bridges have been torn down and unfortunately, I believe it is not only the oldest, but is now the only one that has not been torn down.

6. Enforcement of weight limit. The document states that traffic

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

First, in my time here, I have not witnessed continual illegal activity of large trucks, buses, or RV’s misusing our bridge. I have seen three or four cars following each other closely over the bridge at the same time, which could account for the weight limit you speak of. But it is absurd to conclude that this illegal activity in any way warrants a redesign of the bridge. Instead of conceding to this bad behavior, the problem must be addressed through other means such as increased enforcement, camera surveillance, educational signage, or clearance bars. That statement again appears to influence against the concept of historic rehabilitation, yet we remind you that a 2014 PennDOT feasibility study before this PEL Study had recommended full rehabilitation of the bridge to 10-tons. There are simple fixes to guarantee that only one vehicle goes over the bridge at a time, or that the weight requirements are respected.

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

Regarding emergency services, ambulances average 5-7 tons. Most firefighters in this area respond directly to the scenes of emergencies using their personal vehicles. In discussing the Narrowsburg Fire Department's occasional mutual aid service to the Milanville vicinity, the document states, "The restricted bridge crossing at Skinners Falls forces NFD to utilize River Road, which has narrow lanes, tight curves, and poor sight distance, as their primary response route to Pennsylvania for full-weight trucks...". We point out that the 10-ton posted River Road will still have the same travel challenges if the Skinners Falls Bridge consisted of a new 40-ton structure. While the speed of a response is obviously important, so too is the safety of the individuals in the vehicles. If this crossing was considered that critical for emergency response, it presumably would have been targeted for immediate reopening or replacement by the NY-PA Joint Interstate Bridge Commission. As a homeowner who endures and tolerates the increased car traffic of tourists visiting Landers's campgrounds during the summer season, but lives with children and animal companions who enjoy being outside, I fear an increase in larger vehicles barreling down our roads would increase the danger to those who reside here. Currently, even with the bridge closed, we experience an increase in vehicular accidents during the summer season with drivers losing control on our steep and windy roads. Last year my neighbor, who lives on one such turn, lost his mailbox twice! To have larger vehicle's navigating these roads all year long would definitely be unsafe for those living on this idyllic road.

Lastly, the Purpose and Need document states that “The Skinners Falls Bridge, in its current condition, does not provide access across the river for recreational vehicles and trailers for recreational boating, fishing, camping, and shopping.” The previously referenced survey results debunk the idea that this is an issue that needs fixing. The fact is that the existing bridge allowed for SAFE recreational use of the campgrounds and DEC River Access, for thousands of people, summer after summer as the NPS statistics will show, since the River’s 1978 Department of the Interior designation, as a Wild, Scenic, Recreational River. This is part of what we love about living here, and why I purchased my house 20 years ago, and willingly pay my taxes for! The draft Purpose and Need Statement must objectively reflect the true will of public input and information gathered from the study, which, in its current form, it does not.

Sincerely,

Erin Feely-Nahem, Resident



Cochecton, NY 12726

Seth Feinberg

From: Xeth <[REDACTED]>
Sent: Thursday, February 10, 2022 7:27 AM
To: Skinners Falls Bridge
Subject: [EXTERNAL] SKINNERS FALLS BRIDGE comment of support from Damascus Resident

Please refer to the Responses to the Most Frequently Submitted Comments for the following topics: ***Alternatives, Historic Preservation, Land Use, Large Trucks, Emergency Response, Public Involvement Process***

TO WHOM IT MAY CONCERN,

Please include my opinion when considering moving forward on this project.

Regarding saving the existing historic Skinners Falls Bridge... The real issue is:

Why SHOULDN'T the Skinner Falls Bridge be restored?

- 1) It's a historical, unique, structure of architectural significance located within a national park
- 2) It's located in a rural, historical, small village setting
- 3) It's restoration will support and provide long term economic and social value for a historic, rural area with a tourist-based local economy
- 4) There is no use for a 40 ton limit modern bridge connecting, winding, 10 ton limit rural roads
- 5) There is no safety or emergency needs that are not already easily managed by existing roads and facilities on both sides of the river.
- 6) A historic, architecturally significant, one-lane bridge serving light local traffic, pedestrians, sightseers and bikes is perfect for this location.

Why is it that the Transportation Department and 'Powers That Be' must always be forced to do the thing the most sensible, sensitive and far-sighted for the community?

Why is focusing on the local community's desires and concerns an uphill battle?

SAVE THE SKINNERS FALLS BRIDGE!

Sincerely,
Seth Feinberg
Damascus, PA

Feb 07, 2022

Tibor Feldman

From: Tibor Feldman <[REDACTED]>
Sent: Monday, February 7, 2022 1:22 PM
To: Skinners Falls Bridge
Subject: [EXTERNAL] Skinner falls bridge

Please refer to the Responses to the Most Frequently Submitted Comments for the following topics:
Alternatives, Emergency Response, Land Use

Please do not UPGRADE what may not need it . Consider the real usage of emergencies versus the beauty and charm of what exists .

Not everything needs replacement

Tibor Feldman

[REDACTED]
Cohecton Ctr

Nys 12727

Sent from my iPhone

Neil Fitzgerald

From: [REDACTED]
Sent: Monday, February 7, 2022 11:16 PM
To: Skinners Falls Bridge; [REDACTED]
Cc: [REDACTED]
Subject: [EXTERNAL] Skinners Falls Bridge

Please refer to the Responses to the Most Frequently Submitted Comments for the following topics:
Alternatives, Public Involvement Process, Emergency Response

Dear Interested Parties:

I live just up the hill from the Skinners Falls Bridge, on the NY side.,

The Skinners Falls purpose and needs statements suggest PennDot and Aecom have predetermined they will tear down Skinners Falls Bridge and replace it with a mega-monster bridge, before reading all the comments from the public, and before informing the public of much-needed information. The purpose and needs statements seem slanted, especially since they do not inform the public of important facts, and certainly do not provide supporting evidence behind its broad statements that are dubious at best but most likely false. The public must be informed of all the facts – and must be given time to respond to these facts – before PennDot and Aecom make any decision.

For instance, Aecom declares the Lake Huntington and Equinunk fire departments need a larger bridge to ensure the safety of our community. How does Aecom know this? Aecom must tell us who at these fire departments believe the departments have been unable to provide adequate services in the two years since the bridge has been closed – or in the years before the bridge was closed. Aecom must furnish the study that shows the number of times the current and previous bridge situations have increased fire damage. Aecom also must furnish a study that specifically shows how many minutes a new bridge save for fire trucks responding to a call.

Given that all the people on the one public comment event clearly stated they did not want a new bridge but wanted the current one repaired, Aecom and PennDOT have a lot of work to do to prove to the public that a new bridge is needed. Neither Aecom or PennDOT has done any of this work.

Sincerely yours,
Neil Fitzgerald
[REDACTED]
Cochecton, NY 12726
[REDACTED]
[REDACTED]

Neil Fitzgerald

From: [REDACTED]
Sent: Monday, February 7, 2022 11:25 PM
To: Skinners Falls Bridge; [REDACTED]
Cc: [REDACTED]
Subject: [EXTERNAL] Skinners Falls Bridge

Please refer to the Responses to the Most Frequently Submitted Comments for the following topics: **Alternatives, Safety, Large Trucks, Public Involvement Process**

To All Interested Parties,

I believe tearing down the current Skinners Falls Bridge and building a new, huge bridge, will result in a large increase in accidents on Milanville Road. The road cannot accommodate large trucks. It can barely accommodate two cars passing each other in opposite directions. The road gets slippery and it is narrow, hilly, and quite winding.

Aecom has not provided the public with a comparative study showing how many traffic accidents will occur with the construction if a huge new bridge versus the repair of the current bridge. Aecom must provide this study and the public must be given time to respond to it.

Sincerely yours,
Neil Fitzgerald
[REDACTED]
Cochecton, NY 12726
[REDACTED]
[REDACTED]

Neil Fitzgerald

From: [REDACTED]
Sent: Monday, February 7, 2022 11:37 PM
To: Skinners Falls Bridge; [REDACTED]
Cc: [REDACTED]
Subject: [EXTERNAL] Skinners Falls Bridge

Please refer to the Responses to the Most Frequently Submitted Comments for the following topics: ***Alternatives, Public Involvement Process***

To All Interested Parties,

The Skinner Falls Bridge questionnaire sent to the public was deeply flawed. Its questions were biased toward tearing down the current bridge and building a new, large bridge.

For instance, the questionnaire did not ask these questions:

- Are you aware of any emergency situation that was not addressed adequately because of the current Skinners Falls Bridge? If so, when and where specifically?
- Do you feel building a new, large bridge will require the Milanville Road to be widened into private property?
- Do you feel building a new, large bridge will add traffic to our area, and if so, is this increase in traffic a good idea to you?
- Do you feel building a new, large bridge will negatively or positively impact the vacation-destination local economy?

I would like to add that in our public hearing, all comments made, both verbally and in the chat, stated reasons why the current bridge must be repaired and a new bridge must not be built.

Sincerely yours,
Neil Fitzgerald
[REDACTED]
Cochecton, NY 12726
[REDACTED]
[REDACTED]

Neil Fitzgerald

From: [REDACTED]
Sent: Monday, February 7, 2022 11:41 PM
To: Skinners Falls Bridge; [REDACTED]
Cc: [REDACTED]
Subject: [EXTERNAL] Skinners Falls Bridge

Please refer to the Responses to the Most Frequently Submitted Comments for the following topics: ***Alternatives, Public Involvement Process***

To All Interested Parties,

The Skinner Falls Bridge questionnaire sent to the public was deeply flawed. Its questions were biased toward tearing down the current bridge and building a new, large bridge.

For instance, the questionnaire did not ask these questions:

- Are you aware of any emergency situation that was not addressed adequately because of the current Skinners Falls Bridge? If so, when and where specifically?
- Do you feel building a new, large bridge will require the Milanville Road to be widened into private property?
- Do you feel building a new, large bridge will add traffic to our area, and if so, is this increase in traffic a good idea to you?
- Do you feel building a new, large bridge will negatively or positively impact the vacation-destination local economy?

I would like to add that in our public hearing, all comments made, both verbally and in the chat, stated reasons why the current bridge must be repaired and a new bridge must not be built.

Sincerely yours,
Neil Fitzgerald
[REDACTED]
Cochecton, NY 12726
[REDACTED]
[REDACTED]

Erik Freeland

From: Erik Freeland <[REDACTED]>
Sent: Saturday, February 5, 2022 2:26 PM
To: [REDACTED]; Skinners Falls Bridge
Subject: [EXTERNAL] Skinners Falls Bridge

Please refer to the Responses to the Most Frequently Submitted Comments for the following topics: **Alternatives, Large Trucks, Emergency Response**

Hello,

I am writing in support of repairing the beloved Skinner’s Falls Bridge.

I have lived up just a few miles upstream for 22 years. We have spent much time frolicking in the swimming hole there with our kids. Adding a modern bridge would completely alter the landscape.

The bridge is lightly trafficked and the PA side can not accommodate a widened road big enough for large emergency vehicles. There are so few homes to which emergency vehicles need access.

This vehicles have always used the Cochection Bridge and there is no harm in continuing that.

Thank you.

Sincerely,
Erik

Erik Freeland
[REDACTED]

#39 Cadence Giersbach

COMPLETE

Collector: Web Link 1 (Web Link)
 Started: Saturday, January 08, 2022 4:52:33 PM
 Last Modified: Saturday, January 08, 2022 5:04:16 PM
 Time Spent: 00:11:42
 IP Address: [REDACTED]

Please refer to the Responses to the Most Frequently Submitted Comments for the following topics: **Support, Alternatives, Safety, Large Trucks, Environmental Impact**

Page 3

Q1

After reading the draft Purpose and Need statements, do these statements identify or clearly express the transportation purpose and need(s) for the Skinners Falls Bridge? (choose one)

Yes, the transportation purpose and need(s) are clearly identified or expressed.

Q2

After reading the draft Purpose and Need statements, are there other transportation purpose(s) or need(s) not identified for the Skinners Falls Bridge? (choose one)

The transportation purpose(s) and need(s) have been identified.

Please use space below to provide more information if you replied "No" to question two.:

we would like a bridge for local usage including cars, bikes and pedestrians. A one lane bridge is fine. We don't want a bridge that is very large or one that will encourage more traffic in the area. We do not need a bridge that is for large vehicles like trailer trucks. There are other bridges in the area that can be used for this purpose. Skinners falls is a very special place and should not be ruined by a big bridge crossing the river at that point.

Q3

Please use the space below to share any other comments or concerns about the transportation draft Purpose and Need document.

a new bridge would not blend in to the surrounding natural area.

Q4

Which of the following best describes your interest in the project? (May select more than one option)

**Resident,
Property Owner**

Q5

Please provide the following information to ensure your comment is considered in the study

First Name and Last Name	Cadence Giersbach
Address (Optional)	████████████████████
City/Town	Cochecton
State	NY
Postal Code	12726
Email Address	████████████████████

#30 Michael Gorr

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Thursday, January 06, 2022 10:12:14 AM
Last Modified: Thursday, January 06, 2022 10:33:11 AM
Time Spent: 00:20:56
IP Address: [REDACTED]

Please refer to the Responses to the Most Frequently Submitted Comments for the following topics: **Alternatives, Support**

Page 3

Q1

After reading the draft Purpose and Need statements, do these statements identify or clearly express the transportation purpose and need(s) for the Skinners Falls Bridge? (choose one)

Yes, the transportation purpose and need(s) are clearly identified or expressed.

Q2

After reading the draft Purpose and Need statements, are there other transportation purpose(s) or need(s) not identified for the Skinners Falls Bridge? (choose one)

The transportation purpose(s) and need(s) have been identified.

Q3

Please use the space below to share any other comments or concerns about the transportation draft Purpose and Need document.

Its 2022, build a real bridge, it's cheaper and it is NEEDED for emergency vehicles.

Q4

Which of the following best describes your interest in the project? (May select more than one option)

Business owner,
Emergency Responder,
Visitor

Q5

Please provide the following information to ensure your comment is considered in the study

First Name and Last Name	Michael Gorr
City/Town	Hortonville
State	NY
Postal Code	12745
Email Address	[REDACTED]
Phone Number (Optional)	[REDACTED]

Nora Halper

From: Nora Eisenberg <[REDACTED]>
Sent: Monday, February 7, 2022 10:39 AM
To: Skinners Falls Bridge
Subject: [EXTERNAL] public comment re skinner's falls bridge

Please refer to the Responses to the Most Frequently Submitted Comments for the following topics: ***Historic Preservation, Tourism, Emergency Response***

As a resident of the Upper Delaware, I am writing to support maintaining and restoring the historic Skinners Falls one-lane bridge. It would be a loss to local residents and the many tourists who are drawn to our scenic section of the Delaware river.

The nearby Narrowsburg and Cochection bridges can more than manage heavy vehicles, including ambulances and firetrucks. I have never heard of anyone in the vicinity needing emergency care and having been denied it because a vehicle couldn't reach them.

Again the one-lane bridge is an important historic structure that gives much to the area and in no way jeopardizes safety of residents.

Thank you
Nora Halper

#14 Anthony Herzog

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, December 14, 2021 2:26:22 PM
Last Modified: Tuesday, December 14, 2021 2:49:15 PM
Time Spent: 00:22:52
IP Address: [REDACTED]

Please refer to the Responses to the Most Frequently Submitted Comments for the following topics: **Land Use, Support**

Page 3

Q1

After reading the draft Purpose and Need statements, do these statements identify or clearly express the transportation purpose and need(s) for the Skinners Falls Bridge? (choose one)

No, the transportation purpose and need(s) aren't clearly identified or expressed (please use space below to explain).

,
Please use space below to provide more information if you replied "No" to question one.:
I believe it is imperative that the Skinners Falls Bridge be able to carry the maximum allowable weight and height allowed by law. Businesses and residents in both states have been penalized by not having the bridge open or having strict weight limits. Heavy fire trucks can cut response times to the mutual aid calls across the river. Life saving vehicles alone make the case for all size vehicles to use the bridge.

Q2

After reading the draft Purpose and Need statements, are there other transportation purpose(s) or need(s) not identified for the Skinners Falls Bridge? (choose one)

The transportation purpose(s) and need(s) have been identified.

,
Please use space below to provide more information if you replied "No" to question two.:
I believe not enough information has been considered as to community needs for growth through strong infrastructure improvements. The traffic counts are down over the past years because of the weight and height restrictions. Loggers, building supply shippers, stone haulers and household moving companies have had to steer clear of the bridge. The entire community has paid a premium in transportation costs because the bridge was not available.

Q3

Please use the space below to share any other comments or concerns about the transportation draft Purpose and Need document.

As a former member of the Penn Dot Transportation Advisory Committee I believe that building to the maximum standard is the only way to go.

Q4

Resident

Which of the following best describes your interest in the project? (May select more than one option)

Q5

Please provide the following information to ensure your comment is considered in the study

First Name and Last Name	Anthony Herzog
Address (Optional)	████████████████████
City/Town	Honesdale
State	PA
Postal Code	18431
Email Address	████████████████████

#38 Star D. Hesse

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Saturday, January 08, 2022 2:44:44 PM
Last Modified: Saturday, January 08, 2022 3:01:29 PM
Time Spent: 00:16:45
IP Address: [Redacted]

Please refer to the Responses to the Most Frequently Submitted Comments for the following topics: Support, Tourism, Historic Preservation

Page 3

Q1

After reading the draft Purpose and Need statements, do these statements identify or clearly express the transportation purpose and need(s) for the Skinners Falls Bridge? (choose one)

Yes, the transportation purpose and need(s) are clearly identified or expressed.

Q2

After reading the draft Purpose and Need statements, are there other transportation purpose(s) or need(s) not identified for the Skinners Falls Bridge? (choose one)

There are transportation purpose(s) or need(s) that have not been identified (please use space below to explain).

Please use space below to provide more information if you replied "No" to question two.: This bridge is the best access to cross back and forth from New York to/and from Pennsylvania. Most of these transportation needs have been identified, but for strictly family and friends ease of visiting and for tourist sight seeing, this bridge is strategically place as the best quick access for both these needs. Save the Skinner's Falls Bridge as an essential asset to all in the area.

Q3

Please use the space below to share any other comments or concerns about the transportation draft Purpose and Need document.

this bridge is also of particular historic and visibly attractive merit. It is essential that it be maintained and not decimated for "progress" as Pennsylvania Station in NYC was.

Q4

Which of the following best describes your interest in the project? (May select more than one option)

- Resident,
Property Owner,
Other

Q5

Please provide the following information to ensure your comment is considered in the study

First Name and Last Name	Star D. Hesse
Address (Optional)	████████████████████
City/Town	Narrowsburg
State	NY
Postal Code	12764
Email Address	████████████████████

Aaron Hicklin

From: Aaron Hicklin <[REDACTED]>
Sent: Monday, February 7, 2022 10:54 AM
To: Cc: Skinners Falls Bridge <Skinnersfallsbridge@aecom.com>
Subject: [EXTERNAL] Skinner's FallBs ridge

Please refer to the Responses to the Most Frequently Submitted Comments for the following topics: ***Alternatives, Tourism, Land Use, Large Trucks***

Dear Ms Moore

I write to you as a business leader in Sullivan County. I own a bookstore in Narrowsburg and in Livingston Manor, oversee a biannual magazine, an arts festival, and create content for the regional radio station, WJFF. I moved here from the UK in part because of the region's outstanding natural beauty. Since I come from a country that has long made the preservation of its heritage central to rural planning, I would like to make the case that it would better serve the area, tourism, and history, if the bridge at Skinners Falls was repaired in keeping with its original design and not replaced with a contemporary design merely to placate a few heavy goods industries that might shave a few minutes from their journey when there are decent alternatives available nearby..

I have invested my life savings into this area, support local employment and tourism (through extensive profiles on my bookstores in The New York Times, Architectural Digest, Travel & Leisures, and many others). In march I speak at SUNY Sullivan to students to explain why they can make a future for themselves here instead of moving to urban centers like New York. I'd like to make the case that one reason is quality of life, and a big part of that is the beauty of the region.

Already the region's lack of thoughtful planning regulations has enabled the development of homes that are entirely out of keeping with the region. Please help preserve the region's beauty, and don't cave in to spurious claims that a new bridge is needed for heavy goods that could easily travel via Narrowsburg, Cohecton, or Callicoon.

Best,

Aaron Hicklin

[GRAND JOURNAL](#) | [DEEP WATER FESTIVAL](#)
ONE GRAND BOOKS

#56 Andrew Hocker

COMPLETE

Collector: Web Link 3 (Web Link)
Started: Monday, February 14, 2022 12:27:06 PM
Last Modified: Wednesday, February 16, 2022 9:44:42 AM
Time Spent: Over a day
IP Address: [REDACTED]

Please refer to the Responses to the Most Frequently Submitted Comments for the following topics: **Support, Historic Preservation, Alternatives, Time**

Page 3

Q1

After reading the draft Purpose and Need statements, do these statements identify or clearly express the transportation purpose and need(s) for the Skinners Falls Bridge? (choose one)

Yes, the transportation purpose and need(s) are clearly identified or expressed.

,
Please use space below to provide more information if you replied "No" to question one.:
Friends, points of interest, commerce and Rt 97 is well maintained in inclement weather. It is easier to get to Rt 652 because PA roads are so poorly maintained. Also commuting to NY from PA made easier.

Q2

After reading the draft Purpose and Need statements, are there other transportation purpose(s) or need(s) not identified for the Skinners Falls Bridge? (choose one)

There are transportation purpose(s) or need(s) that have not been identified (please use space below to explain).

,
Please use space below to provide more information if you replied "No" to question two.:
It would be great to keep some history, in my opinion. The old bridge is aesthetically pleasing and could be restored but the bureaucracy would make it an expensive and lengthy process. Use old bridge for foot traffic and put 2 lane bridge down stream next to it. save on demolition?

Q3

Please use the space below to share any other comments or concerns about the transportation draft Purpose and Need document.

Concern Increased population- real estate boom on both sides of the rivers, we need a timely resolution to this issue. Whatever is decided, please let's make it snappy.

Q4

Resident

Which of the following best describes your interest in the project? (May select more than one option)

Q5

Please provide the following information to ensure your comment is considered in the study

First Name and Last Name	Andrew Hocker
Address (Optional)	██████████
City/Town	Milanville
State	PA
Postal Code	18443
Email Address	██████████
Phone Number (Optional)	██████████

#55 Lyle Hocker

COMPLETE

Collector: Web Link 6 (Web Link)
 Started: Monday, February 14, 2022 4:37:40 PM
 Last Modified: Monday, February 14, 2022 4:41:04 PM
 Time Spent: 00:03:24
 IP Address: [REDACTED]

Please refer to the Responses to the Most Frequently Submitted Comments for the following topics: **Alternatives, Environmental Impact, Support**

Page 3

Q1

After reading the draft Purpose and Need statements, do these statements identify or clearly express the transportation purpose and need(s) for the Skinners Falls Bridge? (choose one)

Yes, the transportation purpose and need(s) are clearly identified or expressed.

Q2

After reading the draft Purpose and Need statements, are there other transportation purpose(s) or need(s) not identified for the Skinners Falls Bridge? (choose one)

The transportation purpose(s) and need(s) have been identified.

Q3

Please use the space below to share any other comments or concerns about the transportation draft Purpose and Need document.

Replace existing bridge with similar design as old bridge to accommodate pedestrian and bike traffic with minimum impact to area. something similar to Pond Eddy bridge. I do maintenance on properties =both sides

Q4

Which of the following best describes your interest in the project? (May select more than one option)

**Resident,
 Property Owner,
 Other**

Q5

Please provide the following information to ensure your comment is considered in the study

First Name and Last Name	Lyle Hocker
Address (Optional)	████████████████████
City/Town	Beach Lake
State	PA
Postal Code	18405
Email Address	████████████████
Phone Number (Optional)	████████████████

#54 Opal Hocker

COMPLETE

Collector: Web Link 3 (Web Link)
Started: Monday, February 14, 2022 12:21:57 PM
Last Modified: Monday, February 14, 2022 12:36:30 PM
Time Spent: 00:14:33
IP Address: [REDACTED]

Please refer to the Responses to the Most Frequently Submitted Comments for the following topics: **Support, Historic Preservation**

Page 3

Q1

After reading the draft Purpose and Need statements, do these statements identify or clearly express the transportation purpose and need(s) for the Skinners Falls Bridge? (choose one)

Yes, the transportation purpose and need(s) are clearly identified or expressed.

Q2

After reading the draft Purpose and Need statements, are there other transportation purpose(s) or need(s) not identified for the Skinners Falls Bridge? (choose one)

The transportation purpose(s) and need(s) have been identified.

,
 Please use space below to provide more information if you replied "No" to question two.:
 Basically needs were well described and covered most transportation needs

Q3

Please use the space below to share any other comments or concerns about the transportation draft Purpose and Need document.

As a member of the Damascus Historical Society, that covers Milanville, we are in pursuit of historical markers and walking tour brochures for this beautiful little quaint town. Only pray whatever is decided the design will be in step with that in mind. Please, please consider this. It is such an important connection to our neighbor NY state and the town.

Q4

Which of the following best describes your interest in the project? (May select more than one option)

Resident,
Property Owner,
Community Organization

Q5

Please provide the following information to ensure your comment is considered in the study

First Name and Last Name	Opal Hocker
Address (Optional)	████████████████████
City/Town	Beach Lake
State	PA
Postal Code	18405
Email Address	████████████████
Phone Number (Optional)	████████████████

Nathan Holth

Please refer to the Responses to the Most Frequently Submitted Comments for the following topics: **Alternatives, Large Trucks, Safety, Tourism, Historic Preservation, Environmental Impact**

From: Nathan Holth <[REDACTED]>
Sent: Wednesday, December 8, 2021 1:58 PM
To: Gerling, Heather <[REDACTED]>
Cc: [REDACTED]; [REDACTED]; Diehl, Emma <[REDACTED]>; [REDACTED]; Russell, Kara <[REDACTED]>; Thompson, Kristina L <[REDACTED]>
Subject: [External] Re: PennDOT Cultural Resources Update: Ov. Delaware, #5 Skinners; Wayne County; SR 1002-651; MPMS# 09983

Heather,

I am in receipt of the documents submitted today. I am deeply disappointed and very frustrated with the findings in this Purpose and Need document. I tried to give this "new" process for doing Section 106 and Purpose and Need the benefit of the doubt, but it seems clear to me now that this "new" way of doing Purpose and Need is going in the direction I feared, and as a result we are just going to have a repeat of the Pond Eddy Bridge... demolition of a bridge that does not need to be (nor should it be) demolished.

The document isn't very specific, but its pretty easy to read between the lines especially after doing Section 106 in Pennsylvania for so many years. Here is what I am seeing.

1. Bridge must have a 30 ton weight limit... or 40 tons if I understand the middle paragraph in Page 3 to mean that because truckers are driving unlawfully we need to increase the weight limit (rather than punish the unlawful drivers). Most pin-connected trusses rehab nicely up to 20 tons, but 30-40 tons for a bridge of this type is going to be difficult, so right off the bat we have nearly written off in-kind restoration.
2. Bridge must be at least two lanes with bike lanes and sidewalks. The addition of any cantilevered sidewalks would further decrease the potential live load capacity of the bridge. Further, even if the bridge could be widened without a drastic loss to its load limit, as a through truss widening the bridge would be very detrimental to the appearance of the bridge... minimization at best, adverse effect at worst. I also am not in agreement that sidewalks are needed. As a one-lane bridge, its not like pedestrians are getting trapped on the bridge when two cars pass each other on the deck. There is only ever one vehicle on the bridge at a time, leaving room for pedestrians along the edge of the roadway. Given how the design of the bridge encourages a massive reduction in driver speed, I actually believe its far safer for pedestrians than any modern bridge, which would encourage extremely high travel speeds compared to what is seen currently.
3. The value of this bridge as a cultural resource is not considered as part of the purpose and need, and does not consider the people who commented during this process that the historic bridge was worth preserving, and is an important aspect of local tourism. When I visited this bridge I noted that the area appears to be frequently visited by people with an interest in the

bridge. Actually, all on their own, a whole group of random people joined me on the bridge to check it out when I visited it. See this photo: <https://historicbridges.org/pennsylvania/skinnersfalls/dscf9037.jpg> clearly showing people using the bridge for tourism purposes, and also note the car in the background and note how as a one-lane bridge there is more than enough room for a car and multiple people to share the same deck. With some changes to the deck and railing layout, I believe this space and its safety could be maximized. Also note this photo showing camping and boating near the bridge: <https://historicbridges.org/pennsylvania/skinnersfalls/dscf9096.jpg> which do you think is more enjoyable... walking or boating under a historic Baltimore truss bridge or a bunch of prestressed AASHTO girders? The bridge clearly has local tourism value and maintaining this use is essential. The bridge is located in a park setting, with a beach overlooking this signature historic bridge, and a large parking lot is available. The bridge is therefore a central attraction of the park, and this use of the bridge should be considered in the Purpose and Need.

4. The traffic counts indicate this bridge qualifies as an AASHTO Very Low Volume Roadway (under 400 ADT). This should be considered in the Purpose and Need, and reduce the need for a massive replacement bridge. A rehabilitated one-lane truss with signals to control traffic safely for example needs to be considered.

The Purpose and Need assumes that this bridge is a critical crossing for extremely heavy emergency vehicles and seasonal farm equipment. It seems to me that the only people who really have a long detour are any vehicles starting their trip right on one side of the bridge and their destination happens to be right on the other side of the bridge. I recognize that would be a long detour. But most people aren't starting and ending right at the bridge. They might be starting or ending from Honesdale, PA or Monticello, NY. In these more typical cases, the detour really isn't significant, especially considering the 3 digit SR routes north and south of the Skinners Falls Bridge, with the Skinners Falls Bridge itself carrying a smaller 4 digit SR route, which is much slower to drive. I therefore question the need to have a bridge in excess of 20 tons. 15-20 Tons would, I suspect allow for "most" vehicles to pass. Also, just because a few people write in and say they would like a replacement bridge with no restrictions does not mean it is the best overall solution. If you asked me if I would like to have a million dollars, of course my answer would be yes... but have I actually justified my NEED for a million dollars? Perhaps not. I would argue that just because someone who doesn't appreciate the historic bridge for what it is prefers a replacement bridge, that doesn't imply a NEED. Is a massive concrete bridge really NEEDED here? I would strongly argue no.

Another key problem with this Purpose and Need is the location of the bridge is (I believe) a National Wild and Scenic River. The National Wild and Scenic River is one of the most hypocritical and harmful programs ever seen in regards to historic bridges. It does not allow for numerous Section 106 alternatives such as preserving the historic bridge for pedestrians next to a replacement bridge, or to construct a one-way couplet of one lane vehicular highway bridges. This is because the National Wild and Scenic River Act, despite listing culture as one of the values of a National Wild and Scenic River, forbids having two bridges at one location. This has been used to demolish numerous historic bridges across the country. It is ironic that an act designed to protect the beauty of a river has actually caused extensive irreversible harm to the

beauty of America's rivers. Anyway, this Purpose and Need as currently presented basically writes off preservation in the current location completely. Given that this is one of the most unique bridges in both Pennsylvania and New York State this is extremely disappointing.

I honestly always wanted to try to approach these processes with a sense of common sense and compromise. I truly do understand that not all historic bridges can be saved. But it is becoming difficult to save even one, due to past demolitions, its not like there are many other options for preservation. As a subdivided Pratt (Baltimore) truss, the Skinners Falls Bridge shares the same general design as the subdivided Pratt (Pennsylvania) truss of Pond Eddy. Most subdivided Pratts in Pennsylvania are Pennsylvania trusses. Nearly all have been demolished by PennDOT, and each surviving Pennsylvania truss is thus very rare today. Even moreso... pin connected Baltimore truss bridges are one of the rarest truss configurations among highway bridges. So, in looking to the spirit of compromise, I find there are very few if any other examples of this bridge type on Pennsylvania highways left to preserve. We can't preserve the Benzette Bridge in Elk County, because that has been demolished. We cant preserve the Cunningham Road Bridge in Adams County because the bridge was demolished. Like the aforementioned Benzette Bridge, the Skinners Falls Bridge is richly decorated with portal bracing ornamentation, something that very few bridges today retain. Further the beauty of the Delaware River needs to be considered. The replacement Pond Eddy Bridge, even as a truss, is nowhere near as harmonizing with the beauty of the river as the delicate pin-connected members of the historic bridge. The same would be true at Skinners Falls.

In conclusion, I am deeply concerned that the Purpose and Need seems excessive for the actual uses of the particular bridge, which has now been closed for many years (calling into question how critical this crossing actually is). If this was such a critical crossing for emergency vehicles it seems to me the bridge should have been immediately rehabilitated without adverse effect, as that would be the quickest way to restore service to the majority of vehicles. Lastly, I am also concerned that the use of this bridge as a local tourism destination is not considered in the purpose and need.

Thanks,

-Nathan Holth

=====

Nathan Holth

Author/ Photographer/Webmaster

-----**HistoricBridges.org**-----

"Promoting the Preservation Of Our Transportation Heritage"



www.historicbridges.org

#25 Jane Ircha

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Saturday, January 01, 2022 12:11:21 PM
Last Modified: Saturday, January 01, 2022 12:13:58 PM
Time Spent: 00:02:37
IP Address: [REDACTED]

Please refer to the Responses to the Most Frequently Submitted Comments for the following topics: **Alternatives, Public Involvement Process, Emergency Response, Land Use, Safety, Large Trucks, Environmental Impact**

Page 3

Q1

After reading the draft Purpose and Need statements, do these statements identify or clearly express the transportation purpose and need(s) for the Skinners Falls Bridge? (choose one)

No, the transportation purpose and need(s) aren't clearly identified or expressed (please use space below to explain).

,
Please use space below to provide more information if you replied "No" to question one.:
I think the purpose and needs statements is clearly stacked in favor of what the engineering firm Aecom wants to do (a new enlarged bridge that makes them more money in engineering fees) and not what people actually stated at the online meeting in 2021.

Q2

After reading the draft Purpose and Need statements, are there other transportation purpose(s) or need(s) not identified for the Skinners Falls Bridge? (choose one)

There are transportation purpose(s) or need(s) that have not been identified (please use space below to explain).

,
Please use space below to provide more information if you replied "No" to question two.:
There are a lot of statements that present the need of emergency vehicles for rescue operations and fire trucks and yet there has been no evidence provided or presented of any problems occurring in missions conducted in the past few years that the bridge was actually closed. As such, these needs seem artificially exaggerated. They merely present what the engineering firm Aecom wants, a new enlarged bridge.

Q3

Please use the space below to share any other comments or concerns about the transportation draft Purpose and Need document.

Let's Stop the Insanity!!!! I believe the purpose and needs statements are clearly stacked in favor of what the engineering firm Aecom wants to do (a new enlarged bridge that makes them more money in engineering fees) and not what people actually stated at the online meeting in 2021. I believe that the transportation needs that are presented are a biased version, counter to what people in the area actually stated they wanted and needed. There are a lot of statements that present the need of emergency vehicles for rescue operations and fire trucks and yet there has been no evidence provided or presented of any problems occurring in missions conducted in the past few years that the bridge was actually closed. As such, these needs seem artificially exaggerated. They merely present what the engineering firm Aecom wants, a new enlarged bridge. This whole survey is a stacked deck. There are no questions on the survey that would help the community make their feelings truly known. For instance, an unbiased survey would add the following questions: 1) Do you feel that the Purpose and Needs Statements are biased or unbiased? Why or why not 2) Do you believe that the initial survey utilized in gathering information for this purpose and needs statement had been written in a biased or unbiased manner as evidenced by the questions that were chosen? Why or why not. 3) Do you believe that the engineering firm Aecom has been biased or unbiased in their handling of the previous surveys whose questions and answers were utilized in preparing the current purpose and needs statement. 4) Are you aware of any emergency situations that were not handled properly because of the bridge closure for the past few years? 5) The purpose and needs statement stated that the fire departments of Lake Huntington and Equinunk had a need for the bridge to accommodate their vehicles, etc. Are you aware of any situations where the fire departments were quoted in any local publication that they would have had a better outcome in any mission if the bridge was open for the last two years? 6) The purpose and needs statement stated that the fire departments of Lake Huntington and Equinunk had a need for the bridge to accommodate their vehicles, etc. Are you aware of who at these fire departments made these statements? Did the purpose and needs statement tell us specifically who made these statements and whether or not that person had the authority to speak on behalf of those respective organizations? Were the statements made by these organizations made after a meeting of all representatives of the fire departments? 7) Do you believe that enlarging the bridge would be a disruption to the beauty and character of Milanville and the surrounding communities. 8) Do you believe enlarging the bridge is merely a first step in eventually enlarging the road between the Milanville bridge and Beach Lake. 9) Do you believe that an enlarged highway between the Milanville bridge and Beach Lake would bring more or less traffic to the area? 10) Do you believe a new enlarged bridge and road would bring stores like Dollar General, beer distributors, and such along the sides of the road? 11) Do you believe that an enlarged bridge and the ensuing extra traffic would result in fewer or more car accidents? 12) Do you believe that an enlarged bridge and the ensuing extra traffic would result in more safety or less safety for children and other campers at the campsite on the New York side of the Milanville bridge? 13) Do you believe that an enlarged bridge would bring more or fewer large trucks to the area. 14) Do you believe that we received any evidence or results of an environmental impact study showing us things like extra pollution, extra noise, extra light, etc. 15) Do you believe that we received any evidence or results of a historical impact study showing us any disruption to the historical character of Milanville bridge and Milanville. 16) Do you believe that there will be more or fewer injuries and deaths caused by an enlarged bridge, more traffic, and larger trucks/vehicles ? 17) Do you believe you were presented with a traffic study that provided information such as how many more car accidents, pedestrian injuries, pedestrian deaths would be caused by enlarging the bridge? Would such a study be useful to you? In my opinion, the entire survey was prepared in an unprofessional manner and would never pass muster in the professional community. After reviewing the questions I presented above, I hope that you agree that the current bridge should be repaired and let's stop the insanity.

Q4

Property Owner

Which of the following best describes your interest in the project? (May select more than one option)

Q5

Please provide the following information to ensure your comment is considered in the study

First Name and Last Name	Jane Ircha
City/Town	Milanville
State	PA
Postal Code	18443
Email Address	[REDACTED]

#24 Steven Ircha

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, December 29, 2021 6:21:09 PM
Last Modified: Saturday, January 01, 2022 10:52:18 AM
Time Spent: Over a day
IP Address: [REDACTED]

Please refer to the Responses to the Most Frequently Submitted Comments for the following topics: **Alternatives, Public Involvement Process**

Page 3

Q1

After reading the draft Purpose and Need statements, do these statements identify or clearly express the transportation purpose and need(s) for the Skinners Falls Bridge? (choose one)

No, the transportation purpose and need(s) aren't clearly identified or expressed (please use space below to explain).

,
 Please use space below to provide more information if you replied "No" to question one.:
 The purpose and needs statements are stacked in favor of what Aecom wants to do (a new enlarged bridge that makes them more money in engineering fees) and not what people actually stated at the online meeting in 2021.

Q2

After reading the draft Purpose and Need statements, are there other transportation purpose(s) or need(s) not identified for the Skinners Falls Bridge? (choose one)

There are transportation purpose(s) or need(s) that have not been identified (please use space below to explain).

,
 Please use space below to provide more information if you replied "No" to question two.:
 The transportation needs that are presented are a corrupt version of what people in the areas actually want. This whole survey is a stacked deck.

Q3

Please use the space below to share any other comments or concerns about the transportation draft Purpose and Need document.

The purpose and needs statements are stacked in favor of what Aecom wants to do (a new enlarged bridge that makes them more money in engineering fees) and not what people actually stated at the online meeting in 2021. The transportation needs that are presented are a corrupt version of what people in the areas actually want. This whole survey is a stacked deck.

Q4

Property Owner

Which of the following best describes your interest in the project? (May select more than one option)

Q5

Please provide the following information to ensure your comment is considered in the study

First Name and Last Name	Steven Ircha
Address (Optional)	██████████
City/Town	Milanville
State	PA
Postal Code	18443
Email Address	██████████
Phone Number (Optional)	██████████

#44 Katalina Iturralde

COMPLETE

Please refer to the Responses to the Most Frequently Submitted Comments for the following topics: **Large Trucks, Support**

Collector: Web Link 1 (Web Link)
 Started: Tuesday, January 11, 2022 8:30:16 AM
 Last Modified: Tuesday, January 11, 2022 8:40:12 AM
 Time Spent: 00:09:56
 IP Address: [REDACTED]

Page 3

Q1

After reading the draft Purpose and Need statements, do these statements identify or clearly express the transportation purpose and need(s) for the Skinners Falls Bridge? (choose one)

Yes, the transportation purpose and need(s) are clearly identified or expressed.

Q2

After reading the draft Purpose and Need statements, are there other transportation purpose(s) or need(s) not identified for the Skinners Falls Bridge? (choose one)

The transportation purpose(s) and need(s) have been identified.

Q3

Please use the space below to share any other comments or concerns about the transportation draft Purpose and Need document.

I am not an advocate for it being used as a truck route, but I would love for it to be back in working conditions to better the commute for myself & other residents in the area. my

Q4

Resident

Which of the following best describes your interest in the project? (May select more than one option)

Q5

Please provide the following information to ensure your comment is considered in the study

First Name and Last Name	Katalina Iturralde
City/Town	Kenoza Lake
State	NY
Postal Code	12750
Email Address	[REDACTED]
Phone Number (Optional)	[REDACTED]

J.C.

From: [REDACTED]
Sent: Wednesday, January 5, 2022 6:03 PM
To: Skinners Falls Bridge
Subject: [EXTERNAL] Skinners Fall Bridge

Please refer to the Responses to the Most Frequently Submitted Comments for the following topic:
Historic Preservation

Please it is a beautiful and I historical bridge that must be restored so that residents and visitors can be reminded how necessary and convenient it is to have. There are two states (New York & Pennsylvania) who can hold hands with each other over a body of water to allow emergency, visitors and residential vehicles to cross over singing look how the "Skinners Fall Bridge" brought me over "Troubled waters"; and the New York & Pennsylvania will smile forever at each other and say "Let's Get Together". And I say "we can make it if we try".

Please make sure and let it be!

J.C. Navy Veteran

[Sent from the all new AOL app for Android](#)

Gail Kelly

From: Gail Kelly <[REDACTED]>
Sent: Sunday, November 7, 2021 3:53 PM
To: Skinners Falls Bridge
Subject: [EXTERNAL] Skinners Falls Bridge

Please refer to the Responses to the Most Frequently Submitted Comments for the following topics:
Alternatives, Large Trucks, Land Use

Good afternoon,

This bridge is such a landmark, I am hoping that it will remain a single lane bridge and will have the required renovations for the average passenger vehicle to safely use. I would hate to see it expanded to allow more traffic especially large trucks as that would be devastating to the area and the terrain. Let's keep it quaint, the area does not have a demand for the trucking industry... My parents had a summer home in Milanville, I know the area quite well and frequently drive there to reminisce.

Best regards,

Gail Kelly.

Sent from my iPad

Carol Lawson

From: Carol Lawson <[REDACTED]>
Sent: Thursday, February 3, 2022 1:35 PM
To: Williams, Susan (PENNDOT) <[REDACTED]>
Subject: [External] Skinners Falls, NY-Milanville, PA Bridge Draft

Please refer to Responses to Specific Comments and Responses to the Most Frequently Submitted Comments for the following topics: **Maintenance, Alternatives, Safety, Public Involvement Process, Emergency Response, Large Trucks**

Dear Ms. Williams:

The “draft” document, “Skinners Falls Bridge Project Purpose and Need Statement” states that the Joint Interstate Bridge Commission, according to an agreement between New York State and Pennsylvania, dating back to 1916-17, is responsible for “the maintenance, repair, or rebuilding of Skinners Falls Bridge” among nine other bridges that cross the Upper Delaware. Clearly, the Skinners Falls Bridge has not had the benefit of the agreed upon “maintenance, repair, and rebuilding” and now, the Commonwealth of Pennsylvania has decided to replace, entirely, the current historically significant bridge with a ham-handed overpass to nowhere — as the billions from the federal infrastructure bill passed recently in D.C., burn a holes in the pockets of our own Department of Transportation. Many of us, who live in this community, at the mercy of poorly graded and maintained roads, whose interactions with DOT in the past, have endured deliberate indifference bordering on hostility when decrying the safety hazards that navigating our roads expose us to as well as our children. Now we are expected to believe that the current bridge is responsible for its own decay, and not gravely damaged through a policy of progressive neglect from DOT over many decades. Nothing in your document, or in the experience of this community, would reassure us that whatever is done to this crossing will be maintained to any standard of safety, to say nothing of your department’s demonstrated contempt for our needs as a community.

The “draft” document is a public document, and as such, is remarkably skewed, and inadequate, in the case it seeks to make for removing an historic structure. Some modicum of diligence was required with respect to the commercial ramifications of the bridge, and the emergency response organizations on the Pennsylvania side of the Delaware — exactly how is this possible for an agency that actually originates from the Pennsylvania side of the Delaware, funded by Pennsylvania taxpayers? You failed to investigate how Welcome Lake Fire and Dive, as well as Beach Lake Volunteer Departments serve “the region” and contribute to the health and overall safety of our community. Your document attempts to convey the impression the the residents along the river on the Pennsylvania side depend entirely on emergency services from New York State and remotely located Equinunk — nothing could be more dishonest, or insulting to the numerous volunteers who work, train and man our emergency services in Wayne County. We’re you stated case so urgent and accurate, the Commonwealth would be open to lawsuits for placing the lives of the resident on the Pennsylvania side in grave jeopardy by closing the bridge and not providing any means of access.

You site a few business establishments, each of which functioned well enough when the Skinners Falls-Milanville Bridge was open, to support replacement. Your document conflates the function of the bridge before closing with some imagined need for some super structure that will magically be a boom to these chosen businesses and ergo, the local economy as a whole. Each of those cited businesses (several of them seasonal in nature) files and income tax return, and the data for the costs and benefits to those business can only be weighed against bottome lines expressed and reported based upon said tax returns, in honesty. Where is that supporting data? In the instance of Polaris (Case) the question should be asked, what the market saturation is for snowmobiles — exactly how many people across from Milanville have, or intend to buy snowmobiles? This concern is located nearer the Narrowsburg Bridge crossing, not the Milanville crossing. How many people do they employ? What impact does each business cited have on the local aggregate economy, in dollar amounts? Who is the largest employer along this stretch of the Delaware? Woodblock Pines? Woodloch Pines has been adversely impacted by the closure of Peggy Runway on the PA side since October — as have numerous businesses in Narrowsburg, and in aggregate these business contribute far more, year round, to the local economy than the few you cite.

You throw out some “numbers” in terms of response times from cherry-picked volunteer and emergency services and never mention, among many, the dive team from Welcome Lake that has always assisted the National Parks Service. Then you throw in some data on numbers of crossings, and claim that entry to the shores of the Delaware from the NY side is so steep that a super-highway bridge is needed. River Road can’t be far more steep and treacherous an approach (to say nothing of the the existing sketchy narrow road conditions to support an parked — or moving- tanker from the fire department) at many points, as it is dangerous winding, and poorly graded. Are we to assume that PA DOT intends to service this proposed new bridge by building a highway along River Road commensurate with Route 97NY on the PA side? Even prior to closing the Skinners Falls Bridge, residents used 97 for expediency and ease — not a condition created by just the closing of the Skinners FALLs Bridge, as your document purports. To put it simply, no bridge will improve the actual substandard road conditions along River Road or access. The Skinners Falls Bridge has never had a traffic problem — one could stroll leisurely across it, in the absence of an occasional car. These are back country roads, not city streets. Is this “replacement” a DOT version of “if you build it, they will come”? To what end or purpose?

PA DOT does nothing to enforce tonnage limits on any of the local roads and small bridges in this region, and the claims that the existing bridge, following decades of neglect and lack of repairs, with subsequent reductions in limits of weight, and the introduction of “headache bars”, that allegedly were vandalized with overweight trucks, constitutes a spurious argument for replacing the bridge. If truck drivers commit and infraction of the law, we are now obligated to give them a gift of a bigger bridge to reward their actions? So they can further erode the winding and narrow River Road and ancillary township roads? Crime pays?

This public document doesn’t fully or accurately reflect the complexity of the social and economic functioning of the robust communities along this stretch of the Delaware. One wonders exactly who will be awarded the contracts, given the degree of obfuscation in the document’s approach and wording. The real stakeholders here are the PA taxpayers who have many roads to maintain, many bridges to maintain, and an agency that is imperious and given to making up its own version of reality. This DRAFT does not reflect the communities it will impact, and to claim so, is disingenuous.

I whole heartedly support the rehabilitation and restoration of the current bridge — no doubt it will be challenging and an educational experience for PA DOT, but it will maintain the healthy heritage of our river community, and protect our fragile roads.

Sincerely,

Carol E. Lawson

Beach Lake, PA 18405

cc: Governor Wolf, etc.

Sent from my iPad

Catherine Lewis

From: Catherine Lewis <[REDACTED]>
Sent: Tuesday, January 4, 2022 2:07 PM
To: Williams, Susan (PENNDOT) <[REDACTED]>
Subject: [External] Skinners falls bridge

Please refer to the Responses to the Most Frequently Submitted Comments for the following topics:
Historic Preservation, Alternatives, Land Use

Dear Ms. Williams,

Many of us who live in the area appreciate the historic bridge and are against destroying it in favor of a bridge that in the end will be more costly as well as change the local communities in ways unfavorable. Do not destroy it. Repair and reuse. Keep our historic landmark.

Sincerely,
Catherine Lewis
Narrowsburg

Sent from my iPhone

#33 PATRICIA MAYER

COMPLETE

Please refer to the Responses to the Most Frequently Submitted Comments for the following topic: **Support**

Collector: Web Link 1 (Web Link)
Started: Friday, January 07, 2022 12:14:31 PM
Last Modified: Friday, January 07, 2022 12:19:44 PM
Time Spent: 00:05:12
IP Address: [REDACTED]

Page 3

Q1

After reading the draft Purpose and Need statements, do these statements identify or clearly express the transportation purpose and need(s) for the Skinners Falls Bridge? (choose one)

Yes, the transportation purpose and need(s) are clearly identified or expressed.

Q2

After reading the draft Purpose and Need statements, are there other transportation purpose(s) or need(s) not identified for the Skinners Falls Bridge? (choose one)

The transportation purpose(s) and need(s) have been identified.

Q3

Please use the space below to share any other comments or concerns about the transportation draft Purpose and Need document.

I LIVE ON RIVER ROAD. I USED THAT BRIDGE EVERY DAY

Q4

Which of the following best describes your interest in the project? (May select more than one option)

**Resident,
Property Owner**

Q5

Please provide the following information to ensure your comment is considered in the study

First Name and Last Name PATRICIA MAYER
Address (Optional) [REDACTED]
City/Town MILANVILLE
State PA
Postal Code 18443-3042
Email Address [REDACTED]

#16 Robert P Montagnese

COMPLETE

Please refer to the Responses to the Most Frequently Submitted Comments for the following topic: **Support**

Collector: Web Link 1 (Web Link)
Started: Wednesday, December 15, 2021 6:09:41 PM
Last Modified: Wednesday, December 15, 2021 6:12:38 PM
Time Spent: 00:02:57
IP Address: [REDACTED]

Page 3

Q1

After reading the draft Purpose and Need statements, do these statements identify or clearly express the transportation purpose and need(s) for the Skinners Falls Bridge? (choose one)

Yes, the transportation purpose and need(s) are clearly identified or expressed.

,
Please use space below to provide more information if you replied "No" to question one.:
It is clear that the bridge provides residents and service vehicles access between NY and PA. It is an important roadway for daily life and more so, emergency services.

Q2

After reading the draft Purpose and Need statements, are there other transportation purpose(s) or need(s) not identified for the Skinners Falls Bridge? (choose one)

The transportation purpose(s) and need(s) have been identified.

,
Please use space below to provide more information if you replied "No" to question two.:
This is a very clear situation, need, and action steps should begin.

Q3

Please use the space below to share any other comments or concerns about the transportation draft Purpose and Need document.

Respondent skipped this question

Q4

Which of the following best describes your interest in the project? (May select more than one option)

Resident

Q5

Please provide the following information to ensure your comment is considered in the study

First Name and Last Name	Robert P Montagnese
Address (Optional)	████████████████████
City/Town	Milanville
State	PA
Postal Code	18443
Email Address	██
Phone Number (Optional)	██████████

#29 Edward P. Osnick

Please refer to Responses to Specific Comments

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, January 04, 2022 7:29:35 PM
Last Modified: Tuesday, January 04, 2022 7:38:15 PM
Time Spent: 00:08:40
IP Address: [Redacted]

Page 3

Q1

After reading the draft Purpose and Need statements, do these statements identify or clearly express the transportation purpose and need(s) for the Skinners Falls Bridge? (choose one)

Yes, the transportation purpose and need(s) are clearly identified or expressed.

Q2

After reading the draft Purpose and Need statements, are there other transportation purpose(s) or need(s) not identified for the Skinners Falls Bridge? (choose one)

There are transportation purpose(s) or need(s) that have not been identified (please use space below to explain).

Please use space below to provide more information if you replied "No" to question two.: Additional coordination should take place with local b sinesses that supply durable goods, fuel, etc.

Q3

Please use the space below to share any other comments or concerns about the transportation draft Purpose and Need document.

ADT numbers should be broken down by month.

Q4

Which of the following best describes your interest in the project? (May select more than one option)

Resident, Property Owner

Q5

Please provide the following information to ensure your comment is considered in the study

First Name and Last Name	Edward P. Osnick
Address (Optional)	████████████████████
City/Town	Beach Lake
State	PA
Postal Code	██████████
Email Address	████████████████████
Phone Number (Optional)	██████████

Evan Padua

From: Evan Padua <[REDACTED]>
Sent: Monday, December 13, 2021 8:26 AM
To: Gerling, Heather
Subject: [External] Skinners falls bridge.

Please refer to the Responses to the Most Frequently Submitted Comments for the following topics: ***Alternatives, Emergency Response, Large Trucks***

Please repair the existing skinners falls bridge to a limited weight and height restriction. That bridge is a main vein for many residents crossing the river. It was once a ferry spot maintained by the Skinner family, it would be a historical disgrace to go backward, by no longer having a way to cross the river there.

Please take this into consideration,

Thank you,

Evan Padua

Damascus township

--

Evan Padua

[REDACTED]

[REDACTED]

Liza Phillips

From: LIZA PHILLIPS <[REDACTED]>
Sent: Monday, February 7, 2022 10:27 AM
To: Skinners Falls Bridge
Subject: [EXTERNAL] Historic Bridge

Please refer to the Responses to the Most Frequently Submitted Comments for the following topics: ***Historic Preservation, Tourism, Large Trucks***

To Whom It May Concern,

I have been a resident of Narrowsburg for more than 20 years. The bridge at Skinners Falls is a historic gem that should be landmarked, not destroyed. It is one of the sites that bring tourists to our area. It would be very shortsighted to tear down this beloved piece of history for no good reason. No huge trucks need to cross this bridge. They can take two other nearby bridges with no problem and little inconvenience.

Please do not allow the destruction of our local history.

Sincerely,

Liza Phillips

Adrienne Picciano

From: Adrienne Picciano <[REDACTED]>
Sent: Wednesday, January 5, 2022 11:59 AM
To: Skinners Falls Bridge
Subject: [EXTERNAL] Comment on P&N statement

Please refer to the Responses to the Most Frequently Submitted Comments for the following topics: **Tourism, Alternatives, Large Trucks, Historic Preservation, Public Involvement Process**

Hello,

I am writing as a 13 year business owner based in Damascus PA, with a service business that delivers to both NY and PA customers in the Upper Delaware Valley region. I've been following this issue closely, as it is in my immediate area of travel. This bridge being closed indefinitely has already negatively impacted businesses and residents on both sides of the river. To destroy the bridge would be a devastation to this community, which is a tourism based economy. The Skinner's bridge should be restored for it's original purpose, which is a one-lane light traffic and foot bridge over a sensitive area such as Skinner's Falls stretch of the river. Our neighboring roads and communities cannot handle heavy duty truck and trailer traffic, we are burdened already with existing maintenance. I am including an excerpt from DCS's letter to PennDOT on this issue which I agree with.

"The community wants proper consideration of the Bridge's historic and aesthetic role and status in the community, which the draft P&N statement ignores. The lack of any agency explanation prevents the public from: 1) understanding why these important issues are absent from the draft P&N statement, and 2) rebutting PennDOT's rationale. For example, if PennDOT were to claim in a comment/response document that historic preservation as to the Bridge were impossible, the public could easily rebut that simply by pointing to the work of the Delaware River Joint Toll Bridge Commission's extensive efforts to preserve and maintain historic bridges under its jurisdiction. 3) In addition to restoration and historic preservation being what the community wants, the Bridge is restorable as verified by both BachSteel's comment letter (in DCS' previous comment package) and Nathan Holth's recent comment email. 4) In addition, PennDOT has again provided a limited-question survey focused on traffic concerns -- nearly identical to its initial one -- for public response on the draft P&N statement. Without a comment/response document, the public has no confirmation that PennDOT actually considered or would consider in the future, the importance of the public's concerns, including the overwhelming interest in preserving the Bridge, the community's historic and aesthetic fabric, and tourism-based economy, including tourism specifically centered on the Bridge's historic character."

--
Adrienne Picciano
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
Damascus, PA 18415

#6 Nancy Powell

COMPLETE

Please refer to the Responses to the Most Frequently Submitted Comments for the following topic: **Support**

Collector: Web Link 1 (Web Link)
Started: Thursday, December 09, 2021 10:54:45 AM
Last Modified: Thursday, December 09, 2021 10:59:33 AM
Time Spent: 00:04:48
IP Address: [REDACTED]

Page 3

Q1

After reading the draft Purpose and Need statements, do these statements identify or clearly express the transportation purpose and need(s) for the Skinners Falls Bridge? (choose one)

Yes, the transportation purpose and need(s) are clearly identified or expressed.

Q2

After reading the draft Purpose and Need statements, are there other transportation purpose(s) or need(s) not identified for the Skinners Falls Bridge? (choose one)

The transportation purpose(s) and need(s) have been identified.

Q3

Please use the space below to share any other comments or concerns about the transportation draft Purpose and Need document.

I feel the bridge should be made safe for vehicles to travel.

Q4

Property Owner

Which of the following best describes your interest in the project? (May select more than one option)

Q5

Please provide the following information to ensure your comment is considered in the study

First Name and Last Name Nancy Powell
Address (Optional) [REDACTED]
City/Town Cochection
State NY
Postal Code 12726
Email Address [REDACTED]

J. Morgan Puett

From: Morgan Puett <[REDACTED]>
Sent: Monday, February 7, 2022 2:18 PM
To: Skinners Falls Bridge
Cc:
Subject: [EXTERNAL] Save the Bridge

Please refer to the Responses to the Most Frequently Submitted Comments for the following topics:
Historic Preservation, Alternatives, Environmental Impact

Hello, Please help save the old Skinners Falls Bridge, it is a jewel in the landscape and the park needs that sweet walk! There must be another spot up or down river for a car bridge, and if you are trying to build a truck bridge, well you must know something we do not. The Upper Delaware Valley River **Recreational Area** is not a place for industry of any kind. Save the bridge!



J. Morgan Puett
Ambassador of Entanglement

www.mildredslane.com
[REDACTED] / Instagram / mildredslane

Mildred's Lane is an art and landscape site created by artists J. Morgan Puett and Mark Dion, deep in rural northeastern Pennsylvania bordering Narrowsburg, NY. Mildred's Lane is a Pennsylvania Nonprofit Corporation, an environmentally progressive cultural site, and residency hosting creative thinkers worldwide. Contact us, visit www.mildredslane.com.

The Mildred Complex(ity) is our project space located on Narrowsburg's Main Street where these multiplicities converge; working-living-making-researching exhibitions, programs, and events by artists of Mildred's Lane. These sites form an art complex(ity) questioning our impact as cultural producers in every aspect of life in the 21st-century. Contact [REDACTED] or [REDACTED]

2022 is the YEAR OF SILVER.
The 25th anniversary of Mildred's Lane!

#57 Colleen M. Clarke Rizzo

COMPLETE

Collector: Web Link 7 (Web Link)
Started: Friday, February 25, 2022 9:02:37 AM
Last Modified: Friday, February 25, 2022 9:56:55 AM
Time Spent: 00:54:17
IP Address: [REDACTED]

Please refer to the Responses to the Most Frequently Submitted Comments for the following topics:
Emergency Response, Maintenance, Historic Preservation

Page 3

Q1

After reading the draft Purpose and Need statements, do these statements identify or clearly express the transportation purpose and need(s) for the Skinners Falls Bridge? (choose one)

No, the transportation purpose and need(s) aren't clearly identified or expressed (please use space below to explain).

,
Please use space below to provide more information if you replied "No" to question one.:
No information provided about Beach Lake, PA fire response. Were they identified as a primary responder?

Q2

After reading the draft Purpose and Need statements, are there other transportation purpose(s) or need(s) not identified for the Skinners Falls Bridge? (choose one)

There are transportation purpose(s) or need(s) that have not been identified (please use space below to explain).

,
Please use space below to provide more information if you replied "No" to question two.:
Is there any data related to Beach Lake (PA) Fire Department services? Equinunk is 30 minutes response time. The bridge has needed a maintenance schedule that didn't appear frequent enough!!!

Q3

Please use the space below to share any other comments or concerns about the transportation draft Purpose and Need document.

Since the Skinners Falls Bridge (SFB) falls into discussion with the Milanville Historic District, it's time to really consider what this means. A "historical bridge" like SFB means that the bridge 1. will need preservation 2. will need maintenance 3. will need advocacy for both preservation and maintenance Is it possible for PennDOT to function with historic preservationists for the good of all stakeholders?

Q4

Property Owner

Which of the following best describes your interest in the project? (May select more than one option)

Q5

Please provide the following information to ensure your comment is considered in the study

First Name and Last Name	Colleen M. Clarke Rizzo
Address (Optional)	██████████
City/Town	North Charleston
State	SC
Postal Code	29405
Email Address	██████████
Phone Number (Optional)	██████████

#31 Robert Robbin

COMPLETE

Collector: Web Link 1 (Web Link)
 Started: Friday, January 07, 2022 11:24:09 AM
 Last Modified: Friday, January 07, 2022 11:48:49 AM
 Time Spent: 00:24:39
 IP Address: [REDACTED]

Please refer to Responses to Specific Comments and Responses to the Most Frequently Submitted Comments for the following topics: **Alternatives, Time**

Page 3

Q1

After reading the draft Purpose and Need statements, do these statements identify or clearly express the transportation purpose and need(s) for the Skinners Falls Bridge? (choose one)

No, the transportation purpose and need(s) aren't clearly identified or expressed (please use space below to explain).

,
 Please use space below to provide more information if you replied "No" to question one.:
 Most significantly, the draft statement fails to consider and disclose the comparative costs of a restored vs new bridge, the time required to restore bridge service under the options (and the relation of cost and time required to fund and complete) and the sustainability of the options, e.g. the costs of the initial construction as well as projected maintenance costs in the future and likelihood and duration of future closings for repairs.

Q2

After reading the draft Purpose and Need statements, are there other transportation purpose(s) or need(s) not identified for the Skinners Falls Bridge? (choose one)

The transportation purpose(s) and need(s) have been identified.

Q3

Please use the space below to share any other comments or concerns about the transportation draft Purpose and Need document.

Time required to restore access is crucial but it seems to have attracted little attention or disclosure notwithstanding that the bridge has been closed for almost half of the last decade..

Q4

Which of the following best describes your interest in the project? (May select more than one option)

**Resident,
 Property Owner**

Q5

Please provide the following information to ensure your comment is considered in the study

First Name and Last Name	Robert Robbin
Address (Optional)	████████████████████
City/Town	Milanville
State	PA
Postal Code	18443
Email Address	██
Phone Number (Optional)	██████████

Marileta Robinson

From: Marileta Robinson <[REDACTED]>
Sent: Sunday, February 6, 2022 3:43 PM
To: Skinners Falls Bridge
Subject: [EXTERNAL] Skinners Falls Bridge Preservation

Please refer to the Responses to the Most Frequently Submitted Comments for the following topics: ***Historic Preservation, Alternatives***

I am a concerned resident of Milanville who believes the preponderant evidence submitted to the commission indicates the importance of preserving the character of the historic Skinners Falls Bridge rather than tearing it down and building a new, larger bridge. I hope the voice of the people will be heard.

Marileta Robinson
[REDACTED]
Milanville, PA 18443

#23 Chris Ryan

Please refer to Responses to Specific Comments

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, December 31, 2021 4:48:12 PM
Last Modified: Friday, December 31, 2021 4:58:11 PM
Time Spent: 00:09:58
IP Address: [REDACTED]

Page 3

Q1

After reading the draft Purpose and Need statements, do these statements identify or clearly express the transportation purpose and need(s) for the Skinners Falls Bridge? (choose one)

Yes, the transportation purpose and need(s) are clearly identified or expressed.

Q2

After reading the draft Purpose and Need statements, are there other transportation purpose(s) or need(s) not identified for the Skinners Falls Bridge? (choose one)

The transportation purpose(s) and need(s) have been identified.

Q3

Please use the space below to share any other comments or concerns about the transportation draft Purpose and Need document.

I think the need for redundancy is key. What happens of the bridges to the north and south have issues? It is only time I am sure.

Q4

Resident

Which of the following best describes your interest in the project? (May select more than one option)

Q5

Please provide the following information to ensure your comment is considered in the study

First Name and Last Name	Chris Ryan
City/Town	North Branch
State	NY
Postal Code	12766
Email Address	[REDACTED]

#21 Susan Sargent

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, December 28, 2021 4:58:17 PM
Last Modified: Tuesday, December 28, 2021 5:00:48 PM
Time Spent: 00:02:30
IP Address: [REDACTED]

Please refer to the Responses to the Most Frequently Submitted Comments for the following topic:
Support

Page 3

Q1

After reading the draft Purpose and Need statements, do these statements identify or clearly express the transportation purpose and need(s) for the Skinners Falls Bridge? (choose one)

Yes, the transportation purpose and need(s) are clearly identified or expressed.

Q2

After reading the draft Purpose and Need statements, are there other transportation purpose(s) or need(s) not identified for the Skinners Falls Bridge? (choose one)

The transportation purpose(s) and need(s) have been identified.

Q3

Please use the space below to share any other comments or concerns about the transportation draft Purpose and Need document.

Simply put, the bridge needs to remain open

Q4

Which of the following best describes your interest in the project? (May select more than one option)

**Resident,
Property Owner**

Q5

Please provide the following information to ensure your comment is considered in the study

First Name and Last Name Susan Sargent
City/Town Beach Lake
State PA
Postal Code 18407
Email Address [REDACTED]

#20 Arthur Satter

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Monday, December 27, 2021 5:02:17 PM
Last Modified: Monday, December 27, 2021 5:14:37 PM
Time Spent: 00:12:19
IP Address: [REDACTED]

Please refer to the Responses to the Most Frequently Submitted Comments for the following topics: **Alternatives, Large Trucks, Support**

Page 3

Q1

After reading the draft Purpose and Need statements, do these statements identify or clearly express the transportation purpose and need(s) for the Skinners Falls Bridge? (choose one)

Yes, the transportation purpose and need(s) are clearly identified or expressed.

Q2

After reading the draft Purpose and Need statements, are there other transportation purpose(s) or need(s) not identified for the Skinners Falls Bridge? (choose one)

The transportation purpose(s) and need(s) have been identified.

Q3

Please use the space below to share any other comments or concerns about the transportation draft Purpose and Need document.

I believe that a one lane bridge is needed and the current one should be replaced. Tractor trailers should not be allowed to use the new bridge as the roads on the PA side are narrow and windy and could cause a dangerous situation. Also a bike / pedestrian walkway is needed on the side of the bridge.

Q4

Resident

Which of the following best describes your interest in the project? (May select more than one option)

Q5

Please provide the following information to ensure your comment is considered in the study

First Name and Last Name	Arthur Satter
Address (Optional)	██████████
City/Town	Beach Lake
State	PA
Postal Code	18405
Email Address	██
Phone Number (Optional)	██████████

#13 Marcy Seckler

COMPLETE

Collector: Web Link 1 (Web Link)
 Started: Monday, December 13, 2021 7:29:02 PM
 Last Modified: Monday, December 13, 2021 7:41:51 PM
 Time Spent: 00:12:48
 IP Address: [REDACTED]

Please refer to the Responses to the Most Frequently Submitted Comments for the following topics: **Alternatives, Safety**

Page 3

Q1

After reading the draft Purpose and Need statements, do these statements identify or clearly express the transportation purpose and need(s) for the Skinners Falls Bridge? (choose one)

No, the transportation purpose and need(s) aren't clearly identified or expressed (please use space below to explain).

,
 Please use space below to provide more information if you replied "No" to question one.:
 The report is biased in favor of replacing the bridge with a larger structure. The bridge as it is (when it was in a working condition), is perfectly adequate to accommodate walkers, bicyclists and pedestrians (as well as motor vehicles). The fact that the bridge is a one lane bridge, necessarily means that drivers, bicyclists and walkers must be courteous to each other, but this has never presented any problem. In fact, the one lane encourages drivers to go slower than they would on a larger bridge.

Q2

After reading the draft Purpose and Need statements, are there other transportation purpose(s) or need(s) not identified for the Skinners Falls Bridge? (choose one)

There are transportation purpose(s) or need(s) that have not been identified (please use space below to explain).

,
 Please use space below to provide more information if you replied "No" to question two.:
 Enlarging the bridge to make additional lanes, would encourage drivers to go faster, thus creating a dangerous situation for the walkers and bicyclists in the area.

Q3

Please use the space below to share any other comments or concerns about the transportation draft Purpose and Need document.

Respondent skipped this question

Q4

Which of the following best describes your interest in the project? (May select more than one option)

Resident

Q5

Please provide the following information to ensure your comment is considered in the study

First Name and Last Name	Marcy Seckler
Address (Optional)	██
City/Town	Milanville
State	PA
Postal Code	18443
Email Address	████████████████████████████████████
Phone Number (Optional)	██████████

#40 Art Michael Staats

COMPLETE

Collector: Web Link 1 (Web Link)
 Started: Saturday, January 08, 2022 8:21:49 PM
 Last Modified: Saturday, January 08, 2022 8:37:03 PM
 Time Spent: 00:15:13
 IP Address: [REDACTED]

Please refer to the Responses to the Most Frequently Submitted Comments for the following topics: **Historic Preservation, Alternatives**

Page 3

Q1

After reading the draft Purpose and Need statements, do these statements identify or clearly express the transportation purpose and need(s) for the Skinners Falls Bridge? (choose one)

No, the transportation purpose and need(s) aren't clearly identified or expressed (please use space below to explain).

,
 Please use space below to provide more information if you replied "No" to question one.:
 The present historic Skinners Falls bridge should be preserved as a historical and integral part of the landscape and community the bridge is in. The bridge was built by The American Bridge Co. owned by JP MORGAN using steel from Andrew Carnegie.....it is absolutely historic and should be preserved. It could be a pedestrian bridge and park to promote tourism. A new bridge with proper approach roadways could be built nearby to handle modern motor traffic.

Q2

After reading the draft Purpose and Need statements, are there other transportation purpose(s) or need(s) not identified for the Skinners Falls Bridge? (choose one)

There are transportation purpose(s) or need(s) that have not been identified (please use space below to explain).

,
 Please use space below to provide more information if you replied "No" to question two.:
 The present historic Skinners Falls bridge should be preserved as a historical and integral part of the landscape and community the bridge is in. The bridge was built by The American Bridge Co. owned by JP MORGAN using steel from Andrew Carnegie.....it is absolutely historic and should be preserved. It could be a pedestrian bridge and park to promote tourism. A new bridge with proper approach roadways could be built nearby to handle modern motor traffic.

Q3

Please use the space below to share any other comments or concerns about the transportation draft Purpose and Need document.

A 'kick starter' could raise money for the new bridge and repairs the the existing bridge.

Q4

Resident

Which of the following best describes your interest in the project? (May select more than one option)

Q5

Please provide the following information to ensure your comment is considered in the study

First Name and Last Name	Art Michael Staats
Address (Optional)	████████████████████
City/Town	Roscoe
State	NY
Postal Code	12776
Email Address	████████████████████
Phone Number (Optional)	██████████

#32 Norman Starr

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, January 07, 2022 11:40:07 AM
Last Modified: Friday, January 07, 2022 11:51:22 AM
Time Spent: 00:11:15
IP Address: [REDACTED]

Please refer to Responses to Specific Comments and Responses to the Most Frequently Submitted Comments for the following topics: ***Alternatives, Historic Preservation, Environmental Impact, Tourism***

Page 3

Q1

After reading the draft Purpose and Need statements, do these statements identify or clearly express the transportation purpose and need(s) for the Skinners Falls Bridge? (choose one)

No, the transportation purpose and need(s) aren't clearly identified or expressed (please use space below to explain).

Q2

After reading the draft Purpose and Need statements, are there other transportation purpose(s) or need(s) not identified for the Skinners Falls Bridge? (choose one)

There are transportation purpose(s) or need(s) that have not been identified (please use space below to explain).

Please use space below to provide more information if you replied "No" to question two.:
Actual use of the bridge, before it was closed, is not clearly delineated.

Q3

Please use the space below to share any other comments or concerns about the transportation draft Purpose and Need document.

I am a resident of Damascus Township and live about 5 miles from Milanville. I strongly support the restoration of the Skinners Falls Bridge to its original 9 ton capacity. This bridge is an historic landmark, is adjacent to the Milanville Historic District, is within the Upper Delaware Scenic and Recreational River corridor and is considered by the National Park Service to contribute to the Cultural Outstandingly Remarkable Value of this corridor. The economy of this area is heavily dependent on tourism and recreational activities. The Skinners Falls Bridge served these uses well for many years and, with restoration, can serve them well into the future. Replacement of the bridge with a 40 ton structure will degrade the Milanville Historic District, increase noise and traffic, eliminate an attraction of historic interest and harm the beauty of this river crossing. It, therefore, will reduce the appeal of this area to tourists and harm the local economy.

Q4

Resident

Which of the following best describes your interest in the project? (May select more than one option)

Q5

Please provide the following information to ensure your comment is considered in the study

First Name and Last Name	Norman Starr
City/Town	Beach Lake
State	PA
Postal Code	18405
Email Address	[REDACTED]

Norman Starr

Please refer to the Responses to the Most Frequently Submitted Comments for the following topics: ***Large Trucks, Alternatives***

From: Norman Starr <[REDACTED]>
Sent: Friday, January 7, 2022 5:09 PM
To: Skinners Falls Bridge; [REDACTED]
Cc: 'DamascusCitizens'
Subject: [EXTERNAL] Comment on the Skinners Falls Bridge Purpose and Need Document

Follow Up Flag: Follow up
Flag Status: Flagged

I submitted a comment today via the PennDOT survey. I tried to submit a second comment via the survey, but was unable to access it. Instead, I got a message saying that I had already taken the survey.

Here is my second comment:

On page 3 of the Purpose and Need document it says: "Regular usage of the bridge by overweight vehicles demonstrates a need to provide a crossing that is suitable for vehicles over ten tons." This is absurd. Usage by overweight vehicles does not demonstrate a "need". These vehicles could clearly cross at Narrowsburg or Callicoon. What it demonstrates is that people will break the law if it is convenient for them and there are no consequences. Cameras, or other methods, could be used to enforce weight limits, and doing so would greatly reduce or eliminate such overweight crossings. Unlawful activity should not be used as a reason to build a new bridge.

In addition, while the document states that PennDOT "has identified vehicles over ten tons (in excess of the original capacity of the bridge) using the Skinners Falls Bridge", it does not say how often these crossings occur or give an estimate of the weights of these vehicles. This is important information. Lack of such information makes it appear that PennDOT is arguing for a predetermined conclusion.

Please respond to this email and let me know if PennDOT will take the comment above into consideration.

Thanks,
Norman Starr

Norman Starr

From: Norman Starr <[REDACTED]>
Sent: Tuesday, February 1, 2022 11:15 AM
To: Skinners Falls Bridge
Cc: [REDACTED]; 'Damascus Citizens'
Subject: [EXTERNAL] Comment on Draft Purpose and Need Document - Skinners Falls Bridge

Please refer to the Responses to the Most Frequently Submitted Comments for the following topics: **Historic Preservation, Alternatives, Public Involvement Process, Tourism, Environmental Impact**

Comment on Purpose statement (page 1 of the Draft Purpose and Need Document):

I object to the statement of Purpose. It is terribly incomplete and views the project out of context, taking only the need to cross the river into consideration, nothing else. Such a myopic statement indicates that the drafters of this document should not have been the ones to write the statement of Purpose.

I believe that the majority of local residents who completed the original survey are in favor of restoring the Skinners Falls Bridge. I believe that restoration would be for the purpose of 1) maintaining the character of the Milanville Historic District, 2) preserving an historic landmark and tourist attraction, 3) maintaining the beauty of this recreational setting, 4) keeping traffic and noise at reasonable levels and 5) providing a functional crossing over the Delaware River (which the Skinners Falls Bridge has done for over 100 years). These considerations must be accounted for in any reasonable statement of Purpose.

Norman Starr

From: Norman Starr <[REDACTED]>
Sent: Tuesday, February 1, 2022 12:09 PM
To: Skinners Falls Bridge
Cc: [REDACTED]; 'Damascus Citizens'
Subject: [EXTERNAL] Comment on Draft Purpose and Need Document - Skinners Falls Bridge

Please refer to Responses to Specific Comments and Responses to the Most Frequently Submitted Comments for the following topics: **Alternatives, Large Trucks**

Comment on Need 1 (page 2 of the Draft Purpose and Need Document):

Need 1, though not clearly stated, is for an operational bridge at Milanville. The document states that "an operational bridge is needed for local commerce". The Skinners Falls Bridge was able to support local commerce for over 100 years. With restoration, it can continue to do so, handling all of the examples given for local commerce.

Under Need 1, the Document states: "Regular usage of the bridge by overweight vehicles demonstrates a need to provide a crossing that is suitable for vehicles over ten tons." This is absurd. Usage by overweight vehicles does not demonstrate a "need". These vehicles could clearly cross at Narrowsburg or Cohecton. What it demonstrates is that people will break the law if it is convenient for them and there are no consequences. Cameras, or other methods, could be used to enforce weight limits, and doing so would greatly reduce or eliminate such overweight crossings. Unlawful activity should not be used as a reason to build a new bridge. Also, the Document does not give any quantitative measure of "regular usage" or of the weights of overweight vehicles that used the bridge. Vague assertions are not adequate evidence of the need to destroy this landmarked structure.

The increased travel times due to the bridge closure presented in this section are misleading. These are the times required to get from one side of the Skinners Falls Bridge to the other when the bridge is closed. For many trips, the increased travel times will be significantly less. For others (eg from Milanville to Callicoon), there will be no increased travel time. Any argument based on increased travel times should be based on the actual increases, not the maximum possible increase.

I agree that a Delaware River crossing is needed at Milanville. I see no convincing evidence in the Purpose and Need Document that this crossing needs to be more than a single lane bridge with a 9 ton capacity.

The single lane, 9 ton, Skinners Falls Bridge provided an adequate crossing over the Delaware River for over 100 years, until its closure over 2 years ago. With restoration, it can continue to serve this function while preserving the beauty of its setting, maintaining the character of the Milanville Historic District and supporting the local tourist and recreational economy.

Norman Starr

Please refer to the Responses to the Most Frequently Submitted Comments for the following topics:
Alternatives, Emergency Response

From: Norman Starr <[REDACTED]>
Sent: Wednesday, February 2, 2022 12:48 PM
To: Skinners Falls Bridge
Cc: [REDACTED] 'Damascus Citizens'
Subject: [EXTERNAL] Comment on Draft Purpose and Need Document - Skinners Falls Bridge

Comment on Need 2 (page 3 of the Draft Purpose and Need Document):

Need 2 is for a "functional bridge" at Milanville to support emergency services. This need was adequately served by the Skinners Falls Bridge for over 100 years, until its closure over 2 years ago. With restoration, it can continue to serve this function while preserving the beauty of its setting, maintaining the character of the Milanville Historic District and supporting the local tourist and recreational economy. The discussion in this section does not provide convincing evidence of the need for a new bridge.

The Skinners Falls Bridge has been closed for over 2 years. During this time, how many emergency vehicles, weighing over 9 tons, have had to take significant additional time getting to their destination due to this closure? Any argument for a new bridge, based on emergency response, should be based on a quantitative analysis of response times and vehicle weights.

Norman Starr

Please refer to the Responses to the Most Frequently Submitted Comments for the following topic:
Large Trucks

From: Norman Starr <[REDACTED]>
Sent: Wednesday, February 2, 2022 12:58 PM
To: Skinners Falls Bridge
Cc: [REDACTED]; 'Damascus Citizens'
Subject: [EXTERNAL] Comment on Draft Purpose and Need Document - Skinners Falls Bridge

Comment on Note 5, Page 2:

The roads on the PA side of the Skinners Falls Bridge, especially River Road, are poorly maintained. There are several locations within a few miles of Milanville where the sides of the road are collapsing. River Road is barely 2 lanes wide at best, and in the areas where one side has collapsed, 2 vehicles cannot safely pass each other. Some areas of collapse have a drop off of over a foot. The drop offs can fill with leaves, debris and snow, making them hard to see, especially at night.

Note 5 on page 2 of the Purpose and Need document says "River Road is posted for ten tons. The roadway posting is in place to reduce excess damage and subsequent excess maintenance and repair caused by heavy truck loads." River Road has suffered significant, unrepaired damage without the added stress of heavy trucks coming over a new bridge at Milanville. Encouraging heavy truck traffic by building a new bridge will make a dangerous situation even worse.

Norman Starr

From: Norman Starr <[REDACTED]>
Sent: Friday, February 4, 2022 12:06 PM
To: Skinners Falls Bridge
Cc: [REDACTED]; 'Damascus Citizens'
Subject: [EXTERNAL] Comment on Draft Purpose and Need Document - Skinners Falls Bridge

Please refer to Responses to Specific Comments and Responses to the Most Frequently Submitted Comments for the following topic:
Alternatives

Comment on Need 3 (page 4 of the Draft Purpose and Need Document):

Need 3 is for "adequate accommodations for pedestrians, bicyclists, and recreational users in the area." This need was adequately served by the Skinners Falls Bridge for over 100 years, until its closure over 2 years ago. With restoration, it can continue to serve this function while preserving the beauty of its setting, maintaining the character of the Milanville Historic District and supporting the local tourist and recreational economy.

The Skinners Falls Bridge is not ideal for pedestrians and bicyclists, but, due to the low traffic volume at this location, has adequately served their needs for years. I have walked across the bridge many times and never had a problem with traffic. I have been in this area for over 30 years and do not know of any local residents who have had a problem crossing the bridge by either foot or bike.

Norman Starr

Please refer to the Responses to the Most Frequently Submitted Comments for the following topics: ***Alternatives, Environmental Impact***

From: Norman Starr <[REDACTED]>
Sent: Friday, February 4, 2022 12:07 PM
To: Skinners Falls Bridge
Cc: [REDACTED]; 'Damascus Citizens'
Subject: [EXTERNAL] Comment on Draft Purpose and Need Document - Skinners Falls Bridge

Comment on property values:

I believe that the destruction of the Skinners Falls Bridge, and its replacement with a new bridge, will negatively impact property values in the Milanville area, particularly those properties in close proximity to the bridge. This impact will be due to the degradation of this scenic location, increased traffic volume, increased volume of heavy trucks and increased traffic noise.

Norman Starr

Please refer to the Responses to the Most Frequently Submitted Comments for the following topics: **Historic Preservation, Alternatives, Public Involvement Process, Tourism, Environmental Impact**

From: Norman Starr <[REDACTED]>
Sent: Monday, February 7, 2022 11:03 AM
To: Skinners Falls Bridge
Subject: [EXTERNAL] FW: Comment on Draft Purpose and Need Document - Skinners Falls Bridge

I am resubmitting this comment because I did not receive a confirmation of receipt.

From: Norman Starr [REDACTED]
Sent: Tuesday, February 01, 2022 11:15 AM
To: [REDACTED] <[REDACTED]>
Cc: [REDACTED]; 'Damascus Citizens' <[REDACTED]>
Subject: Comment on Draft Purpose and Need Document - Skinners Falls Bridge

Comment on Purpose statement (page 1 of the Draft Purpose and Need Document):

I object to the statement of Purpose. It is terribly incomplete and views the project out of context, taking only the need to cross the river into consideration, nothing else. Such a myopic statement indicates that the drafters of this document should not have been the ones to write the statement of Purpose.

I believe that the majority of local residents who completed the original survey are in favor of restoring the Skinners Falls Bridge. I believe that restoration would be for the purpose of 1) maintaining the character of the Milanville Historic District, 2) preserving an historic landmark and tourist attraction, 3) maintaining the beauty of this recreational setting, 4) keeping traffic and noise at reasonable levels and 5) providing a functional crossing over the Delaware River (which the Skinners Falls Bridge has done for over 100 years). These considerations must be accounted for in any reasonable statement of Purpose.

Please refer to Responses to Specific Comments and Responses to the Most Frequently Submitted Comments for the following topics: **Alternatives, Large Trucks**

Norman Starr

From: Norman Starr <[REDACTED]>
Sent: Monday, February 7, 2022 11:04 AM
To: Skinners Falls Bridge
Subject: [EXTERNAL] FW: Comment on Draft Purpose and Need Document - Skinners Falls Bridge

I am resubmitting this comment because I did not receive a confirmation of receipt.

From: Norman Starr [REDACTED]
Sent: Tuesday, February 01, 2022 12:09 PM
To: [REDACTED]
Cc: [REDACTED] 'Damascus Citizens' [REDACTED]
Subject: Comment on Draft Purpose and Need Document - Skinners Falls Bridge

Comment on Need 1 (page 2 of the Draft Purpose and Need Document):
Need 1, though not clearly stated, is for an operational bridge at Milanville. The document states that "an operational bridge is needed for local commerce". The Skinners Falls Bridge was able to support local commerce for over 100 years. With restoration, it can continue to do so, handling all of the examples given for local commerce.

Under Need 1, the Document states: "Regular usage of the bridge by overweight vehicles demonstrates a need to provide a crossing that is suitable for vehicles over ten tons." This is absurd. Usage by overweight vehicles does not demonstrate a "need". These vehicles could clearly cross at Narrowsburg or Cohecton. What it demonstrates is that people will break the law if it is convenient for them and there are no consequences. Cameras, or other methods, could be used to enforce weight limits, and doing so would greatly reduce or eliminate such overweight crossings. Unlawful activity should not be used as a reason to build a new bridge. Also, the Document does not give any quantitative measure of "regular usage" or of the weights of overweight vehicles that used the bridge. Vague assertions are not adequate evidence of the need to destroy this landmarked structure.

The increased travel times due to the bridge closure presented in this section are misleading. These are the times required to get from one side of the Skinners Falls Bridge to the other when the bridge is closed. For many trips, the increased travel times will be significantly less. For others (eg from Milanville to Callicoon), there will be no increased travel time. Any argument based on increased travel times should be based on the actual increases, not the maximum possible increase.

I agree that a Delaware River crossing is needed at Milanville. I see no convincing evidence in the Purpose and Need Document that this crossing needs to be more than a single lane bridge with a 9 ton capacity.

The single lane, 9 ton, Skinners Falls Bridge provided an adequate crossing over the Delaware River for over 100 years, until its closure over 2 years ago. With restoration, it can continue to serve this function while preserving the beauty of its setting, maintaining the character of the Milanville Historic District and supporting the local tourist and recreational economy.

Norman Starr

Please refer to the Responses to the Most Frequently Submitted Comments for the following topic: **Large Trucks**

From: Norman Starr <[REDACTED]>
Sent: Monday, February 7, 2022 11:04 AM
To: Skinners Falls Bridge
Subject: [EXTERNAL] FW: Comment on Draft Purpose and Need Document - Skinners Falls Bridge

I am resubmitting this comment because I did not receive a confirmation of receipt.

From: Norman Starr [REDACTED]
Sent: Wednesday, February 02, 2022 12:58 PM
To: [REDACTED] <[REDACTED]>
Cc: [REDACTED]; 'Damascus Citizens' [REDACTED]
Subject: Comment on Draft Purpose and Need Document - Skinners Falls Bridge

Comment on Note 5, Page 2:

The roads on the PA side of the Skinners Falls Bridge, especially River Road, are poorly maintained. There are several locations within a few miles of Milanville where the sides of the road are collapsing. River Road is barely 2 lanes wide at best, and in the areas where one side has collapsed, 2 vehicles cannot safely pass each other. Some areas of collapse have a drop off of over a foot. The drop offs can fill with leaves, debris and snow, making them hard to see, especially at night.

Note 5 on page 2 of the Purpose and Need document says "River Road is posted for ten tons. The roadway posting is in place to reduce excess damage and subsequent excess maintenance and repair caused by heavy truck loads." River Road has suffered significant, unrepaired damage without the added stress of heavy trucks coming over a new bridge at Milanville. Encouraging heavy truck traffic by building a new bridge will make a dangerous situation even worse.

Please refer to Responses to Specific Comments

Rosie Starr

From: Rosie Starr <[REDACTED]>
Sent: Saturday, February 5, 2022 2:19 PM
To: Skinners Falls Bridge; Damascus Citizens; [REDACTED]
Subject: [EXTERNAL] comments submitted re: Skinners Falls Bridge
Attachments: Ed Wesely submitted comments on Skinners Falls Bridge.mp3

Please find the attach mp3 audio comments by Ed Wesely regarding the Skinners Falls Bridge

Beverly Sterner

From: Beverly Sterner <[REDACTED]>
Sent: Monday, February 7, 2022 2:07 PM
To: Williams, Susan (PENNDOT) <[REDACTED]>
Subject: [External] Skinners falls Milanville Bridge

Please refer to the Responses to the Most Frequently Submitted Comments for the following topics: **Large Trucks, Emergency Response, Alternatives, Public Involvement Process**

Susan Williams, Project Manager
Penn Dept. of Transportation

Dear Susan Williams,

I live at [REDACTED] since 1975.

I am a taxpayer. My phone [REDACTED]
[REDACTED]

I have made my views known before and will again and again until they are heard, along with my neighbors.

I have seen my little road eroded from the heavy trucks permitted to travel on it right now --- and I don't want more!

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

It is highly presumptuous to include "emergency response vehicles" as a definitive Purpose component. The document later states that local emergency response vehicles weigh in the range of 15-31 tons for certain fire trucks. Considering that the single-lane bridge was constructed with a 9-ton weight limit, reduced to a 7-ton posting in 2007 and further downgraded to 4 tons in 2013, declaring that category of vehicle as a required use appears to set an unachievable standard of inadequacy for the bridge's restoration to its original capacity from the very first sentence. However, note that when this project's Planning and Environmental Linkages (PEL) public survey asked the question, "Beyond your personal usage, what types of vehicles/users need to have access to the bridge to meet local needs?", respondents prioritized: 1. Personal cars or trucks; 2. Pedestrians; 3. Bicycles; 4. Ambulances; and 5. Small Delivery Vehicles. The three types of usage

least selected were: 6. Recreational Vehicles/Boat Trailers; 7. Large Trucks/Fire Trucks/Tractor Trailers; and 8. Buses. Clearly not every possible use of this bridge is deemed appropriate or necessary for this location served by weight-posted roads. Emergency responders in the Upper Delaware River Valley have made reasonable accommodations over the bridge's 118-year existence to use modern two-lane concrete alternatives at short distances away in Narrowsburg and Cochection rather than this 13-foot-wide, timber plank deck crossing. NOTE; The National Park Service has used the Bridge for emergency response, and finds the ten ton weight limit adequate for its needs.

Sincerely,
Beverly Sterner

Susan Sullivan

From: Susan Sullivan <[REDACTED]>
Sent: Tuesday, January 4, 2022 1:04 PM
To: Williams, Susan (PENNDOT) <[REDACTED]>
Cc: >; AECOM <[REDACTED]>
Subject: [External] Skinners Falls, NY Milanville, PA Bridge Public Comment on Draft Purpose and Need Document

Please refer to Responses to Specific Comments and Responses to the Most Frequently Submitted Comments for the following topics: **Large Trucks, Tourism, Safety, Alternatives, Emergency Response, Public Involvement Process, Historic Preservation, Land Use, NPS Designation, Industry**

Susan J. Sullivan
[REDACTED]
Narrowsburg, NY 12764
[REDACTED]
[REDACTED]

January 4, 2022

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

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

Dear Ms. Williams,

I am a 30 year full time resident of the Upper Delaware River Valley. I work here, and pay taxes here. I have used the Milanville Skinners Falls Bridge to get to work, and regularly meet family and friends beneath this beautiful structure. It is an intrinsic part of the river valley. I have commented previously on the absurdity of building a 40 ton bridge to access twisting, winding 10 ton limit roads. Following are my additional comments to specifically address the Purpose and Needs document released on Dec 8.

Note Paragraph 4 regarding **Public Safety**.
I specifically request a complete answer to this question. Why was this issue not on your survey?

1. Lack of accuracy or objectivity; I find your study to be subjectively skewed against rehabilitation of the existing 1902 bridge through faulty assumptions and glaring omissions. The Purpose and Need document's intent is to establish a rationale for the proposed transportation improvement project and outline the facts that justify it. As stated on your comment form, it "will drive the process for alternatives consideration, inform the environmental analysis and support the alternative selection process." Therefore, its contents and tone will play a critical role in decision-making over the fate of the Skinners Falls-Milanville Bridge that has been indefinitely closed to all usage since October 16, 2019.
2. Emergency vehicle access; The one-sentence draft Purpose, which reads: "The purpose of this project is to provide a safe and efficient crossing of the Delaware River at Skinners Falls for cars, trucks, emergency response vehicles, bicyclists, and pedestrians."

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

3. No summary document indicating the public’s concerns.

The draft document offers these three Needs statements:

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

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

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

4. Public Safety. Nowhere in your document do you address the danger to those using the recreational campground on the north side of the Bridge, and the DEC River Access on the south side. Thousands of people visit this area each summer as measured by National Park Service visitor statistics. Families with small children children regularly cross from the campground to the access. Encouraging larger vehicles to cross at higher speeds creates an extremely dangerous situation. Do you propose to close the Campground? I want an answer to this question.

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

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

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

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

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

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

Lastly, the Purpose and Need document states that “The Skinners Falls Bridge, in its current condition, does not provide access across the river for recreational vehicles and trailers for recreational boating, fishing, camping, and shopping.” The previously referenced survey results debunk the idea that this is considered to be an issue that needs fixing. The fact is that the existing bridge allowed for SAFE recreational use of the campgrounds and DEC River Access, for thousands of people, summer after summer as the NPS statistics will show, since the River’s 1978 Department of the Interior designation, as a Wild, Scenic, Recreational River.

The draft Purpose and Need Statement must objectively reflect the true will of public input and information gathered from the study, which, in its current form, it does not.

Sincerely,

Susan Sullivan, Resident

██████████
Narrowsburg, NY 12764

#17 Brad Taylor

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Saturday, December 18, 2021 12:24:56 PM
Last Modified: Saturday, December 18, 2021 12:37:03 PM
Time Spent: 00:12:07
IP Address: [REDACTED]

Please refer to the Responses to the Most Frequently Submitted Comments for the following topic: **Public Involvement Process**

Page 3

Q1

After reading the draft Purpose and Need statements, do these statements identify or clearly express the transportation purpose and need(s) for the Skinners Falls Bridge? (choose one)

No, the transportation purpose and need(s) aren't clearly identified or expressed (please use space below to explain).

Please use space below to provide more information if you replied "No" to question one.:
Because the P & N statement is drafted by Penn DoT w/o adequate public participation, it states a group of purposes which have not been roundly agreed. The use of Skinners Falls Bridge for heavy commercial hauling traffic (tractor-trailer rigs) has not been clearly requested by community groups or individuals (to my knowledge). In general all uses and purposes for the bridge should be established with extensive community participation and total transparency BEFORE the P & N doc is adopted and BEFORE this survey is presented to the wider public.

Q2

After reading the draft Purpose and Need statements, are there other transportation purpose(s) or need(s) not identified for the Skinners Falls Bridge? (choose one)

There are transportation purpose(s) or need(s) that have not been identified (please use space below to explain).

Please use space below to provide more information if you replied "No" to question two.:
There are purposes and needs stated that have not been clearly agreed among townspeople, stakeholders, frequent users of the bridge.

Q3

Please use the space below to share any other comments or concerns about the transportation draft Purpose and Need document.

There needs to be a working process, organized and established right away, for townspeople to directly work with PennDoT reps to establish optimum purposes and needs.

Q4

Resident

Which of the following best describes your interest in the project? (May select more than one option)

Q5

Please provide the following information to ensure your comment is considered in the study

First Name and Last Name	Brad Taylor
City/Town	Milanville
State	PA
Postal Code	18443
Email Address	[REDACTED]

#37 Jaquel Theis

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Monday, January 03, 2022 1:22:11 PM
Last Modified: Saturday, January 08, 2022 8:34:21 AM
Time Spent: Over a day
IP Address: [REDACTED]

Please refer to the Responses to the Most Frequently Submitted Comments for the following topic: **Support**

Page 3

Q1

After reading the draft Purpose and Need statements, do these statements identify or clearly express the transportation purpose and need(s) for the Skinners Falls Bridge? (choose one)

Yes, the transportation purpose and need(s) are clearly identified or expressed.

Q2

After reading the draft Purpose and Need statements, are there other transportation purpose(s) or need(s) not identified for the Skinners Falls Bridge? (choose one)

There are transportation purpose(s) or need(s) that have not been identified (please use space below to explain).

Please use space below to provide more information if you replied "No" to question two.:

Passenger cars are mentioned, but not their need. There are a lot of independent contractors working in the area of Milanville that need to be able to access 97 a bit faster than driving up and down the River Road to get to a supply store. Aside of the independent contractors, there are establishment workers needing to get to their jobs in New York. When everyone is using the River Roads, it becomes a hazard. The school buses need more space and if less people are encroaching on their route, it will be a safer and more efficient system. More and more people are moving to the Milanville area. We need to keep it safe.

Q3

Please use the space below to share any other comments or concerns about the transportation draft Purpose and Need document.

Respondent skipped this question

Q4

Which of the following best describes your interest in the project? (May select more than one option)

Business owner,
Property Owner

Q5

Please provide the following information to ensure your comment is considered in the study

First Name and Last Name	Jaquel Theis
Company (Optional)	██████████
Address (Optional)	████████████████████
City/Town	Milanville
State	PA
Postal Code	18443
Email Address	██
Phone Number (Optional)	██████████

Scott Van Gorder

From: VanGorder <[REDACTED]>
Sent: Friday, January 14, 2022 1:13 PM
To: Skinners Falls Bridge
Subject: [EXTERNAL] preserve

Please refer to the Responses to the Most Frequently Submitted Comments for the following topics:
Historic Preservation, Alternatives

I am a lifelong resident here, a native of Honesdale. Please do not replace the historic and aesthetically pleasing bridge. Please do repair and restore to its original stature.

Thank you,
Scott Van Gorder

Sent from [Mail](#) for Windows



This email has been checked for viruses by Avast antivirus software.
www.avast.com

#48 sarah van ouwerkerk

COMPLETE

Collector: Web Link 1 (Web Link)
 Started: Saturday, February 05, 2022 9:00:18 AM
 Last Modified: Sunday, February 06, 2022 6:47:11 AM
 Time Spent: 21:46:52
 IP Address: [REDACTED]

Please refer to the Responses to the Most Frequently Submitted Comments for the following topics: **Large Trucks, Environmental Impact, Historic Preservation, Tourism**

Page 3

Q1

After reading the draft Purpose and Need statements, do these statements identify or clearly express the transportation purpose and need(s) for the Skinners Falls Bridge? (choose one)

No, the transportation purpose and need(s) aren't clearly identified or expressed (please use space below to explain).

Please use space below to provide more information if you replied "No" to question one.:
 The need to accommodate larger heavier trucks on the bridge has not been established. One usually doesn't go to the lowest common denominator (illegal truck traffic by weight) to find solutions. It is completely absurd to offer a plan that increases noise, is an eyesore in the middle of an historic area serving thousands, and say it's because some trucks illegally used the bridge.

Q2

After reading the draft Purpose and Need statements, are there other transportation purpose(s) or need(s) not identified for the Skinners Falls Bridge? (choose one)

The transportation purpose(s) and need(s) have been identified.

Q3

Please use the space below to share any other comments or concerns about the transportation draft Purpose and Need document.

This bridge plays a crucial role in the economy as it is, for tourism. This industry has been identified as one of the largest areas for growth. It should certainly carry more weight than illegal truck usage. Charge a toll if necessary, but recognize the importance of maintaining and restoring the bridge to its original state. The character of the bridge is one of the attractions for tourism.

Q4

Which of the following best describes your interest in the project? (May select more than one option)

**Resident,
Property Owner**

Q5

Please provide the following information to ensure your comment is considered in the study

First Name and Last Name	sarah van ouwerkerk
Address (Optional)	████████████████████
City/Town	cochecton
State	NY
Postal Code	12726
Email Address	████████████████████
Phone Number (Optional)	██████████

#10 Jane Varcoe

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, December 10, 2021 12:13:40 PM
Last Modified: Friday, December 10, 2021 12:16:52 PM
Time Spent: 00:03:12
IP Address: [REDACTED]

Please refer to the Responses to the Most Frequently Submitted Comments for the following topic: **Historic Preservation**

Page 3

Q1

After reading the draft Purpose and Need statements, do these statements identify or clearly express the transportation purpose and need(s) for the Skinners Falls Bridge? (choose one)

Yes, the transportation purpose and need(s) are clearly identified or expressed.

Q2

After reading the draft Purpose and Need statements, are there other transportation purpose(s) or need(s) not identified for the Skinners Falls Bridge? (choose one)

The transportation purpose(s) and need(s) have been identified.

Q3

Please use the space below to share any other comments or concerns about the transportation draft Purpose and Need document.

Historical preservation must be a number 1 priority for the Skinner's Falls Bridge.

Q4

Community Organization

Which of the following best describes your interest in the project? (May select more than one option)

Q5

Please provide the following information to ensure your comment is considered in the study

First Name and Last Name	Jane Varcoe
Company (Optional)	Waymart Borough
Address (Optional)	[REDACTED]
City/Town	Waymart
State	PA
Postal Code	18472
Email Address	[REDACTED]
Phone Number (Optional)	[REDACTED]

#28 Louise Washer

COMPLETE

Collector: Web Link 1 (Web Link)
 Started: Monday, January 03, 2022 3:53:47 PM
 Last Modified: Monday, January 03, 2022 3:58:56 PM
 Time Spent: 00:05:08
 IP Address: [REDACTED]

Please refer to the Responses to the Most Frequently Submitted Comments for the following topics: **Alternatives, Public Involvement Process, Land Use, Historic Preservation, Environmental Impact**

Page 3

Q1

After reading the draft Purpose and Need statements, do these statements identify or clearly express the transportation purpose and need(s) for the Skinners Falls Bridge? (choose one)

No, the transportation purpose and need(s) aren't clearly identified or expressed (please use space below to explain).

,
 Please use space below to provide more information if you replied "No" to question one.:
 The questions asked originally seem biased toward what those who stand to profit from a new larger bridge are interested in. This community wants to preserve the bridge as it is.

Q2

After reading the draft Purpose and Need statements, are there other transportation purpose(s) or need(s) not identified for the Skinners Falls Bridge? (choose one)

There are transportation purpose(s) or need(s) that have not been identified (please use space below to explain).

,
 Please use space below to provide more information if you replied "No" to question two.:
 The need to cross the river on a working bridge without disrupting the local environment or the historic nature of the bridge are needs not included

Q3

Please use the space below to share any other comments or concerns about the transportation draft Purpose and Need document.

Please repair and preserve the existing bridge as is with minimal disruption to water quality or wildlife habitat. That is the need this community has.

Q4

Which of the following best describes your interest in the project? (May select more than one option)

**Resident,
 Property Owner**

Q5

Please provide the following information to ensure your comment is considered in the study

First Name and Last Name **Louise Washer**

Address (Optional) **[REDACTED]**

City/Town **Beach Lake**

State **PA**

Postal Code **18405**

Email Address **[REDACTED]**

Phone Number (Optional) **[REDACTED]**

#41 Eugene Wolff

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Sunday, January 09, 2022 1:04:48 PM
Last Modified: Sunday, January 09, 2022 1:10:49 PM
Time Spent: 00:06:00
IP Address: [REDACTED]

Please refer to Responses to Specific Comments and Responses to the Most Frequently Submitted Comments for the following topic: **Alternatives**

Page 3

Q1

After reading the draft Purpose and Need statements, do these statements identify or clearly express the transportation purpose and need(s) for the Skinners Falls Bridge? (choose one)

Yes, the transportation purpose and need(s) are clearly identified or expressed.

Q2

After reading the draft Purpose and Need statements, are there other transportation purpose(s) or need(s) not identified for the Skinners Falls Bridge? (choose one)

There are transportation purpose(s) or need(s) that have not been identified (please use space below to explain).

Please use space below to provide more information if you replied "No" to question two.:
 No mention of motorcycle use.

Q3

Please use the space below to share any other comments or concerns about the transportation draft Purpose and Need document.

Not enough emphasise on keeping true to the existing single lane bridge

Q4

Which of the following best describes your interest in the project? (May select more than one option)

Resident,
Business owner,
Property Owner

Q5

Please provide the following information to ensure your comment is considered in the study

First Name and Last Name Eugene Wolff
City/Town Narrowsburg
State NY
Postal Code 12764
Email Address [REDACTED]

William Yeaman

Please refer to the Responses to the Most Frequently Submitted Comments for the following topics: **Historic Preservation, Alternatives, Environmental Impact**

From: Yeaman, William <[REDACTED]>
Sent: Monday, February 7, 2022 8:26 PM
To: Skinners Falls Bridge
Cc: **Subject:** [EXTERNAL] Milanville-Skinners Falls Bridge (Bridge #5) Project

Dear PennDOT employees and representatives,

I am writing to express my strong support for the rehabilitation and repair of the 1902 Milanville Bridge. It's historic and cultural significance cannot be understated as it has been designate as a contributing resource to the Milanville Historic District. It is also listed on the National Register of Historic Places and on the National register of Historical Bridges. The bridge also helped to contribute to the Upper Delaware River's designation as a National Scenic and Recreational River. It is among the oldest bridges associated with the American Bridge Company. As stated on the website of Historic Bridges.org "This utterly spectacular bridge would stand out as an extremely ornate, beautiful, and significant metal truss bridge if it were located even in the most truss-dense region in the country...(its) local rarity and importance can not be understated." And among 277 "Baltimore through truss" bridges erected by all builders, 12 are listed on the National Register of Historic Places with just 3 functioning as highway bridges as of 2018. The Milanville Bridge is one of the 3, the other two being in New England, and is the last of its kind on the Upper Delaware's National Scenic River. I would think that the removal and replacement of the "Historic" Milanville Bridge with a new bridge should engage Section 106 of the National Historic Preservation Act. This action would also involve critical environmental issues which may require an Environmental Impact Statement.

Preservation and upgrading of historic structures can be done as proven all the time. Although the Milanville Bridge has received repairs and rehabilitation over its long life, the alterations have been sensitive to the original design of the bridge and have not affected its visual quality. A qualified engineering study should be able to prove that the Milanville bridge can be restored to its original 9 ton limit for use by cars, small trucks, ambulances, pedestrians and cyclists. Lessons can be learned from a similar Baltimore truss bridge that carries thousands of commuter cars a week across the Middle Delaware River at Dingman's Ferry, PA. This bridge is a privately owned toll bridge with a 9 ton weight limit whose owner's have provided continuing maintenance and inspection since 1900.

For many years, I often visited my mother in Milanville, PA. She lived on a small farm on River RD only a few miles downstream of the Milanville Bridge. I would make quarterly weekly visits from my home in Bethesda, MD from the mid 1980's until my mother moved to Charlottesville, VA in 2014. I always looked forward to visit and experience the beauty, architecture, and historical setting of the Milanville Bridge, either admiring it from the shore or from Skinner's Falls, or traveling over it by car or bike, or paddling under it in a canoe.

Milanville is a vibrant community with roots in colonial America with 14 homes and structures (including the Milanville Bridge), listed on the National Register of Historic Places. The Milanville Bridge fits hand in glove into this remarkable setting and is an integral and critical element of the Milanville Historic District with recognized outstanding scenic and cultural values and deserves preservation. I strongly feel that the Milanville

Bridge deserves a complete and full commitment to preservation on the part of PennDOT. It is treasured by residents and visitors and it would be tragic to destroy it.

Thank you for the consideration of my views.

Sincerely,
William Yeaman

[REDACTED]

Bethesda, MD 20814-4252

[REDACTED]

#36 Cody Yerkes

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Saturday, January 08, 2022 8:13:00 AM
Last Modified: Saturday, January 08, 2022 8:15:26 AM
Time Spent: 00:02:26
IP Address: [REDACTED]

Please refer to the Responses to the Most Frequently Submitted Comments for the following topic:
Support

Page 3

Q1

After reading the draft Purpose and Need statements, do these statements identify or clearly express the transportation purpose and need(s) for the Skinners Falls Bridge? (choose one)

Yes, the transportation purpose and need(s) are clearly identified or expressed.

Q2

After reading the draft Purpose and Need statements, are there other transportation purpose(s) or need(s) not identified for the Skinners Falls Bridge? (choose one)

The transportation purpose(s) and need(s) have been identified.

Q3

Please use the space below to share any other comments or concerns about the transportation draft Purpose and Need document.

We need the bridge it's save so much time and gas in times like these where people want to save money

Q4

Resident

Which of the following best describes your interest in the project? (May select more than one option)

Q5

Please provide the following information to ensure your comment is considered in the study

First Name and Last Name	Cody Yerkes
Address (Optional)	[REDACTED]
City/Town	Milanville
State	PA
Postal Code	18443
Email Address	[REDACTED]

Please refer to the Responses to the Most Frequently Submitted Comments for the following topics: ***Historic Preservation, Alternatives, Large Trucks, Tourism***

Amy Yoes

From: Amy Yoes <[REDACTED]>
Sent: Thursday, January 6, 2022 5:11 PM
To: [REDACTED]; Williams, Susan (PENNDOT) <[REDACTED]>
Cc: [REDACTED]
Subject: [External] Skinners Falls Bridge

Hello Susan Williams,

Please don't destroy this historic bridge. "Progress" sometimes means placing value on historic structures. It would be a travesty to have large trucks crossing the river at this scenic, historic place. A lot of tax money is generated from tourism around this beautiful area. Thanks for considering my needs. I moved up here from the city for to be surrounded by the beauty of the river. Trucks have plenty of other places to cross the river. I join the DCS and the effort to stop this terrible plan of yours.

Amy Yoes
[REDACTED]
Narrowsburg NY 12764

Alice Zinnes

From: Alice Zinnes <[REDACTED]>
Sent: Monday, February 7, 2022 9:55 PM
To: Skinners Falls Bridge; [REDACTED]
Cc: [REDACTED]
Subject: [EXTERNAL] Skinners Falls Bridge

Please refer to the Responses to the Most Frequently Submitted Comments for the following topics: ***Alternatives, Large Trucks***

Dear Interested Parties:

I live on [REDACTED], just up the hill from the stop sign.

On the morning of Dec. 22, 2021, the roads around the Skinners Falls Bridge were incredibly icy. Though there had been no snow that night, the temperatures were quite cold. When I left my home and carefully drove down Milanville Road I was stopped by the road crew: A large vehicle had skidded and crashed, and so no cars could go through.

I relate this anecdote to illustrate how impractical and actually unsafe it would be to replace the current Skinners Falls Bridge with a large new bridge capable. Milanville Road, the road leading off from the bridge, simply cannot handle large trucks. Milanville Road is too narrow, too steep, and too windy. Because it runs horizontally and midway from the hilltop to the stream, water often accumulates on the road. When it is cold, this water turns to black ice. Milanville Road is a dangerous road even for cars to navigate. It is extremely dangerous for small trucks, and would be impossible for large trucks.

If PennDOT were to replace the current bridge with one capable of carrying large trucks, PennDOT also would need to upgrade Milanville Road, quite a costly and time-consuming project. Upgrading that road would require widening the road, which would then require encroaching on private property running along the road. Inevitably PennDOT would be thrown into years of legal battles as property owners fight for their right to their private property. These legal battles will be costly for everyone, and obviously delay for years any crossing of the river at Skinners Falls.

Fixing the current bridge not only is a much more cost-effective alternative, but also safer for vehicles and far more appropriate for the community than tearing it down and, replacing it with an unneeded large new bridge.

Sincerely yours,
Alice Zinnes

[REDACTED]
Milanville, PA 18443
[REDACTED]

Alice Zinnes

From: Alice Zinnes <[REDACTED]>
Sent: Monday, February 7, 2022 11:12 PM
To: Skinners Falls Bridge; [REDACTED]
Cc: [REDACTED]
Subject: [EXTERNAL] Subject: Skinners Falls Bridge

Please refer to the Responses to the Most Frequently Submitted Comments for the following topics: ***Alternatives, Public Involvement Process, Emergency Response***

Dear Interested Parties:

My house is on [REDACTED], just up the hill from the stop sign.

The Skinners Falls purpose and needs statements suggest PennDot and Aecom have predetermined they will tear down Skinners Falls Bridge and replace it with a mega-monster bridge, before reading all the comments from the public, and before informing the public of much-needed information. The purpose and needs statements seem slanted, especially since they do not inform the public of important facts, and certainly do not provide supporting evidence behind its broad statements that are dubious at best but most likely false. The public must be informed of all the facts – and must be given time to respond to these facts – before PennDot and Aecom make any decision.

For instance, Aecom declares the Lake Huntington and Equinunk fire departments need a larger bridge to ensure the safety of our community. How does Aecom know this? Aecom must tell us who at these fire departments believe the departments have been unable to provide adequate services in the two years since the bridge has been closed – or in the years before the bridge was closed. Aecom must furnish the study that shows the number of times the current and previous bridge situations have increased fire damage. Aecom also must furnish a study that specifically shows how many minutes a new bridge save for fire trucks responding to a call.

Given that all the people on the one public comment event clearly stated they did not want a new bridge but wanted the current one repaired, Aecom and PennDOT have a lot of work to do to prove to the public that a new bridge is needed. Neither Aecom or PennDOT has done any of this work.

Sincerely yours,

Alice Zinnes

[REDACTED]
Milanville, PA 18443

[REDACTED]
[REDACTED]

Alice Zinnes

From: Alice Zinnes <[REDACTED]>
Sent: Monday, February 7, 2022 11:24 PM
To: Skinners Falls Bridge; [REDACTED]
Cc: [REDACTED]
Subject: [EXTERNAL] Skinners Falls Bridge

Please refer to the Responses to the Most Frequently Submitted Comments for the following topics:
Alternatives, Safety, Large Trucks, Public Involvement Process

To All Interested Parties,

I believe tearing down the current Skinners Falls Bridge and building a new, huge bridge, will result in a large increase in accidents on Milanville Road. The road cannot accommodate large trucks. It can barely accommodate two cars passing each other in opposite directions. The road gets slippery and it is narrow, hilly, and quite winding.

Aecom has not provided the public with a comparative study showing how many traffic accidents will occur with the construction if a huge new bridge versus the repair of the current bridge. Aecom must provide this study and the public must be given time to respond to it.

Sincerely yours,

Alice Zinnes

[REDACTED]

Milanville, PA 18443

[REDACTED]

[REDACTED]

Alice Zinnes

From: Alice Zinnes <[REDACTED]>
Sent: Monday, February 7, 2022 11:39 PM
To: Skinners Falls Bridge; [REDACTED]
Cc: [REDACTED]
Subject: [EXTERNAL] Skinners Falls Bridge

Please refer to the Responses to the Most Frequently Submitted Comments for the following topics: ***Alternatives, Public Involvement Process***

To All Interested Parties,

The Skinner Falls Bridge questionnaire sent to the public was deeply flawed. Its questions were biased toward tearing down the current bridge and building a new, large bridge.

For instance, the questionnaire did not ask these questions:

- Are you aware of any emergency situation that was not addressed adequately because of the current Skinners Falls Bridge? If so, when and where specifically?
- Do you feel building a new, large bridge will require the Milanville Road to be widened into private property?
- Do you feel building a new, large bridge will add traffic to our area, and if so, is this increase in traffic a good idea to you?
- Do you feel building a new, large bridge will negatively or positively impact the vacation-destination local economy?

I would like to add that in our public hearing, all comments made, both verbally and in the chat, stated reasons why the current bridge must be repaired and a new bridge must not be built.

Sincerely yours,

Alice Zinnes

[REDACTED]
Milanville, PA 18443

[REDACTED]
[REDACTED]

Alice Zinnes

From: Alice Zinnes <[REDACTED]>
Sent: Monday, February 7, 2022 11:47 PM
To: Skinners Falls Bridge; [REDACTED]
Cc: [REDACTED]
Subject: [EXTERNAL] Skinners Falls Bridge

Please refer to Responses to Specific Comments and Responses to the Most Frequently Submitted Comments for the following topics: **Large Trucks, Tourism, Safety, Alternatives, Emergency Response, Public Involvement Process, Historic Preservation, Land Use, NPS Designation, Industry**

I am reprinting a letter written by Susan Sullivan, fellow resident of my community, because she so eloquently has said exactly what I believe. Please see below.

Sincerely yours,
Alice Zinnes

[REDACTED]
Milanville, PA 18443

[REDACTED]
[REDACTED]

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

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

Dear Ms. Williams,

I am a 30 year full time resident of the Upper Delaware River Valley. I work here, and pay taxes here. I have used the Milanville Skinners Falls Bridge to get to work, and regularly meet family and friends beneath this beautiful structure. It is an intrinsic part of the river valley. I have commented previously on the absurdity of building a 40 ton bridge to access twisting, winding 10 ton limit roads. Following are my additional comments to specifically address the Purpose and Needs document released on Dec 8. Note Paragraph 4 regarding Public Safety.

I specifically request a complete answer to this question. Why was this issue not on your survey?

1. Lack of accuracy or objectivity; I find your study to be subjectively skewed against rehabilitation of the existing 1902 bridge through faulty assumptions and glaring omissions. The Purpose and Need document's intent is to establish a rationale for the proposed transportation improvement project and outline the facts that justify it. As stated on your comment form, it "will drive the process for alternatives consideration, inform the environmental analysis and support the alternative selection process." Therefore, its contents and tone will play a critical role in decision-making over the fate of the Skinners Falls-Milanville Bridge that has been indefinitely closed to all usage since October 16, 2019.

2. Emergency vehicle access; The one-sentence draft Purpose, which reads: "The purpose of this project is to provide a safe and efficient crossing of the Delaware River at Skinners Falls for cars, trucks, emergency response vehicles, bicyclists, and pedestrians."

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

accommodations over the bridge's 118-year existence to use modern two-lane concrete alternatives at short distances away in Narrowsburg and Cochection rather than this 13-foot-wide, timber plank deck crossing. NOTE; The National Park Service has used the Bridge for emergency response, and finds the ten ton weight limit adequate for its needs.

3. No summery document indicating the public's concerns.

The draft document offers these three Needs statements:

1. The Skinners Falls Bridge is currently closed to traffic due to its condition, which limits

efficient access for residents, businesses, and recreational users.

2. Emergency response is negatively affected by the absence of a functional bridge in the vicinity of Skinners Falls.

3. The Skinners Falls Bridge does not provide adequate accommodations for pedestrians, bicyclists, and recreational users in the area.

It states that all public feedback received via the March 30, 2021 virtual public meeting attended by 143 people, the survey conducted from March 31-June 1 with 286 respondents, and the unknown number of project hotline calls, email messages, and comment letters was incorporated into the development of these

Needs, yet no comprehensive summary document has been offered for review. Instead, each of the draft Needs is elaborated on with cherry-picked information to support them. I am one of the 143 people left out of this document.

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

4. Public Safety. Nowhere in your document do you address the danger to those using the recreational campground on the north side of the Bridge, and the DEC River Access on the south side. Thousands of people visit this area each summer as measured by National Park Service visitor statistics. Families with small children children regularly cross from the campground to the access. Encouraging larger vehicles to cross at higher speeds creates an extremely dangerous situation. Do you propose to close the Campground? I want an answer to this question.

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

Given the rare existence of pin-connected Baltimore truss bridges today, its qualification for

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

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

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

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

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

Lastly, the Purpose and Need document states that “The Skinners Falls Bridge, in its current condition, does not provide access across the river for recreational vehicles and trailers for recreational boating, fishing, camping, and shopping.” The previously referenced survey results debunk the idea that this is considered to be an issue that needs fixing. The fact is that the existing bridge allowed for SAFE recreational use of the campgrounds and DEC River Access, for thousands of people, summer after summer as the NPS statistics will show, since the River’s 1978 Department of the Interior designation, as a Wild, Scenic, Recreational River.

The draft Purpose and Need Statement must objectively reflect the true will of public input and information gathered from the study, which, in its current form, it does not.

Sincerely,

Susan Sullivan, Resident

[REDACTED]

Narrowsburg, NY 12764

ATTACHMENT 2

County and Local Organization Comments

#45 Steven Adams, Damascus Township, PA Supervisor

COMPLETE

Please refer to the Responses to the Most Frequently Submitted Comments for the following topic: **Support**

Collector: Web Link 1 (Web Link)
Started: Tuesday, January 11, 2022 5:53:20 AM
Last Modified: Wednesday, January 12, 2022 7:34:35 AM
Time Spent: Over a day
IP Address: [Redacted]

Page 3

Q1

After reading the draft Purpose and Need statements, do these statements identify or clearly express the transportation purpose and need(s) for the Skinners Falls Bridge? (choose one)

Yes, the transportation purpose and need(s) are clearly identified or expressed.

Q2

After reading the draft Purpose and Need statements, are there other transportation purpose(s) or need(s) not identified for the Skinners Falls Bridge? (choose one)

The transportation purpose(s) and need(s) have been identified.

Q3

Please use the space below to share any other comments or concerns about the transportation draft Purpose and Need document.

The bridge was important enough to build in 1902, when transportation was primarily horses and trains. Cars, trucks, and motorcycles were not even a major consideration. To think we would not replace this bridge with a structure to accommodate current needs as well as future needs, would be a disservice to the community and the region.

Q4

Which of the following best describes your interest in the project? (May select more than one option)

- Resident,
Business owner,
Public Official,
Emergency Responder,
Property Owner

Q5

Please provide the following information to ensure your comment is considered in the study

First Name and Last Name	Steven Adams
Company (Optional)	Damascus Township Supervisor
Address (Optional)	██████████
City/Town	Honesdale
State	PA
Postal Code	18431
Email Address	████████████████████
Phone Number (Optional)	██████████

Damascus Citizens for Sustainability

From: Lauren Williams <lmw@greenworkslawconsulting.com>
Sent: Saturday, December 18, 2021 9:35 PM
To: Skiddersfallsbridge@aecom.com
Subject: [External] Milanville-Skidders Falls Bridge (Bridge #5) Project

Please refer to the response letter issued by PennDOT on January 20, 2022 (Attachment 4) and Responses to the Most Frequently Submitted Comments for the following topics: **Public Involvement Process, Historic Preservation, Land Use, Environmental Impact, Large Trucks, Tourism, Alternatives**

Please kindly see the attached correspondence, sent on behalf of Damascus Citizens for Sustainability. Thank you.

Lauren Williams

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

8 Atkinson Drive #1746
Doylestown, PA 18901
Office Phone/Fax: 267-360-6188
Email: lmw@greenworkslawconsulting.com

Pronouns: she/her/they/them

THIS MESSAGE AND ANY ATTACHED DOCUMENTS MAY CONTAIN CONFIDENTIAL AND/OR PRIVILEGED INFORMATION. IF YOU ARE NOT THE INTENDED RECIPIENT OR AN AUTHORIZED AGENT OF THE INTENDED RECIPIENT, PLEASE DO NOT READ, DISTRIBUTE, COPY, OR USE THIS INFORMATION. IF YOU HAVE RECEIVED THIS TRANSMISSION IN ERROR, PLEASE NOTIFY THE SENDER IMMEDIATELY AND DELETE THIS MESSAGE AND ALL ATTACHMENTS.

Greenworks

LAW AND CONSULTING LLC

Phone/Fax: 267-360-6188 | Email: lmw@greenworkslawconsulting.com | Address: 8 Atkinson Drive #1746, Doylestown, PA 18901

December 18, 2021

Kris Thompson
Heather Gerling
Cultural Resources Section
Environmental Policy & Development Section
Pennsylvania Dept. of Transportation
P.O. Box 3790
Harrisburg, PA 17105-3790
Via email: hgerling@pa.gov
krthompson@pa.gov

Jason Sharp, Esq.
Chief Counsel
Office of Chief Counsel
Pennsylvania Department of Transportation
9th Floor, Commonwealth Keystone Building
Harrisburg, PA 17120
Via email: jsharp@pa.gov

Susan Williams
Engineering District 4-0 Liaison Unit
Pennsylvania Dept. of Transportation
55 Keystone Industrial Park
Dunmore, PA 18512-1516
Via email:
Skinnerfallsbridge@aecom.com

Neil Shemo, P.E.
Project Manager
AECOM
100 Sterling Parkway, Suite 205
Mechanicsburg, PA 17050
Via email:
Skinnerfallsbridge@aecom.com

**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 the ongoing Planning and Environmental Linkages (“PEL”) Study on the Milanville-Skinners Falls Bridge (“Bridge”). As noted in our August 24, 2021 letter, DCS has serious concerns about the PEL Study process, its responsiveness to the public, and its compliance with the law. The recently-released draft Purpose and Need statement only augments those concerns. For the reasons identified below, PennDOT must: 1) withdraw the draft Purpose and Need (“P&N”) statement; 2) issue a comment/response document that explains why PennDOT has elevated certain low-priority items from comments and ignored significant public concerns; and 3) once a new draft P&N document is issued, ensure a public comment period that does not straddle the busiest holiday season of the year. If PennDOT refuses to withdraw the draft statement, it must extend the comment period by ninety (90) days.



PennDOT has released the draft P&N document for public comment, over the busiest holiday season of the year. The P&N document, according to PennDOT's Publication 319, is a key document intended to guide future design and planning processes, including a NEPA analysis and alternatives assessments. Placing the comment period for such a crucial document over the Christmas and New Years' holidays strongly gives the appearance that PennDOT seeks to squelch public and agency comment on the draft statement.

This is only amplified by the fact that the draft P&N statement fails to incorporate the most significant concerns of the public and agencies such as the Upper Delaware Council, and does so without any explanation for such omission. Contrary to PennDOT's prior statements, PennDOT has failed to release a comment/response document. Such a document should precede or at least accompany the draft P&N statement to identify PennDOT's rationale for, *inter alia*, excluding the overwhelming public emphasis on, e.g., historic preservation, quality of life/aesthetics, and traffic calming/no large trucks. (Skinners Falls Bridge PEL Study Public Survey Results, p.3; PEL Study Project Advisory Committee Meeting #2 Presentation, September 23, 2021, slide 24).¹ Even PennDOT's PAC #2 presentation states on slide 24:

"Reoccurring [sic] points of interest among email and survey respondents included:

- Restoration and acknowledgement of bridge as a historic resource
- Quality of life and local aesthetics
- Role of bridge in the local economy"

However, the draft P&N document is devoid of any mention of these concerns, except for tying in purported concerns about the local economy to support large truck usage of the bridge - usage that is illegal and contrary to the desires expressed in public input.² PennDOT ignored the most common public concerns, while amplifying matters

¹ <https://www.penndot.gov/RegionalOffices/district-4/PublicMeetings/Wayne%20County/Documents/SFB%20PAC%20MTG%2002.pdf>

² PennDOT is basically saying that because select bad actors use the Bridge illegally, PennDOT should make the Bridge capable of carrying more weight. (Draft P&N Statement, p.3). This is absurd. This is tantamount to saying that because there are people who drive 95 MPH on the highway, the speed limit should be higher.

If overweight vehicles are illegally using the Bridge, PennDOT should develop mechanisms of identifying the operators and taking enforcement action. PennDOT's approach stands in stark contrast to the Delaware River Joint Toll Bridge Commission, who has methods in place to protect weight- and size-limited bridges, has preserved and maintained historic bridges such as the bridge at Washington's Crossing, and even considered banning the modern-style Hummer vehicles from the Washington's Crossing Bridge because of the large size. (<https://historicbridges.org/bridges/browser/?bridgebrowser=newjersey/washingtoncrossing/>) The DRJTBC's efforts to preserve and maintain historic bridges under its jurisdiction further demonstrate just



that very few commenters emphasized (e.g. large truck or trailer usage). In addition, PennDOT failed to explain in a comment/response document its rationale for its actions.

The lack of a comment/response document prevents the public from holding PennDOT accountable. PennDOT's failure to provide such a document also prevents the public from pushing back on arbitrary agency choices that limit future alternatives analyses. The community wants proper consideration of the Bridge's historic and aesthetic role and status in the community, which the draft P&N statement ignores. The lack of any agency explanation prevents the public from: 1) understanding why these important issues are absent from the draft P&N statement, and 2) rebutting PennDOT's rationale. For example, if PennDOT were to claim in a comment/response document that historic preservation as to the Bridge were impossible, the public could easily rebut that simply by pointing to the work of the Delaware River Joint Toll Bridge Commission's extensive efforts to preserve and maintain historic bridges under its jurisdiction.³ In addition to restoration and historic preservation being what the community wants, the Bridge is restorable as verified by both BachSteel's comment letter (in DCS' previous comment package) and Nathan Holth's recent comment email.⁴

In addition, PennDOT has again provided a limited-question survey focused on traffic concerns -- nearly identical to its initial one -- for public response on the draft P&N statement. Without a comment/response document, the public has no confirmation that PennDOT actually considered or would consider in the future, the importance of the public's concerns, including the overwhelming interest in preserving the Bridge, the community's historic and aesthetic fabric, and tourism-based economy, including tourism specifically centered on the Bridge's historic character.

PennDOT's Publication 319 and the PennDOT Connects Policy underscore the importance of actual incorporation of public concerns into the Purpose and Need document, and of transparency in transportation planning. The lack of any explanation for PennDOT's rejection of the public's most salient concerns in composing the draft Purpose and Need statement directly contradicts PennDOT's own directives, and further gives the public the impression that their concerns do not matter and PennDOT

how weak PennDOT's focus is on historic preservation. Indeed, the DRJTBC envisions "safe and efficient" river crossings as inclusive of historic bridges, not to the exclusion of them, as PennDOT's track record demonstrates.

It is also worth noting that a cantilevered pedestrian walkway (bicyclists must walk bikes) was installed on the Washington Crossing Bridge in 1926. <https://www.drjtbc.org/bridges/washington-crossing/>

³ See, e.g., <http://www.drjtbc.org/project/freebridge>; <http://www.drjtbc.org/bridge-info/>

⁴ See BachSteel comment letter (sent with DCS's comment package); 12-8-2021 Comment Email from Nathan Holth (HistoricBridges.org) to PennDOT.

PennDOT Employees and Representatives
Milanville-Skinners Falls Bridge (Bridge #5) Project
December 18, 2021
Page 4



is going through the motions in this process to get to a desired outcome of bridge replacement, contrary to overwhelming public sentiment.

Thus, PennDOT must: 1) withdraw the draft P&N statement; 2) issue a comment/response document that explains why PennDOT has elevated certain low-priority items from comments and ignored significant public concerns; and 3) once a new draft P&N document is issued, ensure a public comment period that does not overlap with the busiest holiday season of the year. If PennDOT refuses to withdraw the draft statement, it must extend the comment period by ninety (90) days.

Thank you for your time and consideration.

Sincerely,

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

cc: Laurie Ramie, UDC Executive Director, 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

Joseph Salvatore, National Park Service - Upper Delaware Scenic and
Recreational River, joseph_salvatore@nps.gov

Nathan Holth, HistoricBridges.org, nathan@historicbridges.org

BachSteel, nels@bachsteel.com

Barbara Arrindell, DCS Director, Director@DamascusCitizens.org

Please refer to Responses to Specific Comments

Damascus Citizens for Sustainability

From: B. Arrindell <Director@DamascusCitizens.org>
Sent: Monday, February 7, 2022 2:44 PM
To: [REDACTED]; Skinners Falls Bridge; Gerling, Heather; [REDACTED]
Cc: Lauren Williams
Subject: [EXTERNAL] comment submission - Milanville-Skinners Falls Bridge (Bridge #5)
Project PA SHPO Project No. 2013-8011-127 PennDOT District 4-0
Attachments: Comments already submitted from DCS.pdf; LETTERS to PennDOT about SK
Bridge.pdf

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

Please see and acknowledge reception of this email and that you can open the two attachments.

Thank you,
B. Arrindell
Director
Damascus Citizens for Sustainability

Heather Gerling, Kris Thompson
Cultural Resources Section, Environmental Policy & Development Section
Pennsylvania Dept. of Transportation, P.O. Box 3790, Harrisburg, PA 17105-3790
Via email: [REDACTED]

February 7, 2022

Susan Williams, Senior Civil Engineer Supervisor Transportation
Engineering District 4-0 Liaison Unit, Pennsylvania Dept. of Transportation
55 Keystone Industrial Park, Dunmore, PA 18512-1516
Via email: [REDACTED] Skinnerfallsbridge@aecom.com

Please refer to Responses to Specific Comments and Responses to the Most Frequently Submitted Comments for the following topics: **Public Involvement Process, Historic Preservation, Alternatives, Land Use**

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

Dear PennDOT Employees and Representatives:

We are providing these **comments and survey responses** again because the draft Purpose and Need statement fails to reflect the input provided in these materials and PennDOT has failed to explain anywhere why it is ignoring the weight of the comments. These comments were given to DCS so that we could follow up and make sure PennDOT properly addressed them. There have been additional new comments submitted that PennDOT must answer as well.

Further:

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

In reviewing the comments attached, I am so impressed with the clarity and relevance of them - and the obvious effort and time it took for their preparation. That they have been completely ignored is infuriating and so wrong.

Sincerely yours,



Barbara Arrindell, Director
Damascus Citizens for Sustainability

DCS
P.O.Box 147
Milanville, PA 18443

DCS@DamascusCitizens.org
Phone 845-252-6677

www.DamascusCitizens.org

Heather Gerling, Kris Thompson
Cultural Resources Section, Environmental Policy & Development Section
Pennsylvania Dept. of Transportation, P.O. Box 3790, Harrisburg, PA 17105-3790
Via email: [REDACTED]

February 7, 2022

Susan Williams, Senior Civil Engineer Supervisor Transportation
Engineering District 4-0 Liaison Unit, Pennsylvania Dept. of Transportation
55 Keystone Industrial Park Dunmore, PA 18512-1516
Via email: [REDACTED] Skinnersfallsbridge@aecom.com

Please refer to Responses to Specific Comments and Responses to the Most Frequently Submitted Comments for the following topics: **Public Involvement Process, Historic Preservation, Alternatives, Land Use**

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

Dear PennDOT Employees and Representatives:

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

Further:

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

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

Sincerely yours,



Barbara Arrindell, Director
Damascus Citizens for Sustainability

DCS
P.O.Box 147
Milanville, PA 18443

DCS@DamascusCitizens.org
Phone 845-252-6677

www.DamascusCitizens.org

Please refer to Responses to the Most Frequently Submitted Comments for the following topics:
Historic Preservation, Alternatives, Tourism, Land Use, Large Trucks

Sullivan County, NY

From: Eisenberg, Freda C. <Freda.Eisenberg@sullivanny.us>
Sent: Tuesday, January 18, 2022 10:26 AM
To: Skinners Falls Bridge <Skinnersfallsbridge@aecom.com>
Subject: [EXTERNAL] Skinners falls bridge purpose and needs statement

Attached please find a letter with comments on the Draft Purpose and Needs Document for the Skinners Falls Bridge Project PEL Study.

Best,

Freda Eisenberg, AICP, Commissioner
Sullivan County Division of Planning and Community Development
100 North Street -- PO Box 5012
Monticello, NY 12701
Tel. (845) 807-0536; Fax (845) 807-0546
Email – freda.eisenberg@sullivanny.us

PLEASE NOTE: Sullivan County is changing the form of its email address system from "@co.sullivan.ny.us" to "@sullivanny.us". To facilitate a smooth transition, please update your contact information to reflect this change.

FREDA C. EISENBERG
COMMISSIONER

JILL M. WEYER
DEPUTY COMMISSIONER



TELEPHONE: (845) 807-0527
FAX: (845) 807-0546
WEBSITE: www.SullivanNY.us

DIVISION OF PLANNING & COMMUNITY DEVELOPMENT
SULLIVAN COUNTY GOVERNMENT CENTER
100 NORTH STREET ■ PO BOX 5012 ■ MONTICELLO, NEW YORK 12701

April 30, 2021

Susan Williams, Project Manager
Pennsylvania Department of Transportation
Via skinersfallsbridge@aecom.com

Dear Ms. Williams,

As a participant in the project advisory committee for the Skinners Falls Bridge Planning and Environmental Linkages (PEL) Study representing Sullivan County, I'm writing to ask that the historical value of the bridge be given stronger consideration and a higher profile in the study. A year ago a joint position statement was prepared for submission to PennDOT by a group of stakeholders, many of whom are participating in the current Study advisory committee. Speaking of the bridge's historical value as the only remaining steel truss bridge recognized in the National Register for the Upper Delaware River Valley, the position statement noted the following:

- *"Preserving these defining features to the extent practicable during another rehabilitation or the incorporating of aspects of these features into any replacement would be important to securing necessary approvals for any major work."*
- *"Should replacement prove to be more feasible it should be accomplished in a manner that incorporates major outstanding remarkable features into the new design while also increasing Bridge capacity. The goal should be to craft the safest, most economically effective and historically sensitive long-term solution; **balancing these factors to the exclusion of none.**" [emphasis added]*

While preservation of the bridge's historic features is not a transportation need per se, it is a need of the communities that depend on tourism and seasonal homeowners to sustain their economy and for whom the historic, rural character of the area is an essential part of their identity and appeal. Historic preservation should be detailed as a priority need in the Study's Purpose and Need statement

I would also like to reiterate a point made during the virtual public meeting by Kristen Porter, a colleague of mine in Sullivan County government who serves as the Buildings Engineer for SC DPW. Kristen noted that the Pennsylvania roads fed by the bridge cannot support the unrestricted vehicle weights. Redevelopment of the Bridge for all vehicle types would therefore have the potential of attracting vehicles onto roads for which they are unsuitable. The compatibility of proposed Bridge capacity with the capacity of local roads should be taken into account.

Sincerely,

Freda Eisenberg, AICP
Commissioner

Please refer to Responses to Specific Comments and Responses to the Most Frequently Submitted Comments for the following topics: **Alternatives, Emergency Response, Public Involvement Process, Historic Preservation, Land Use, Large Trucks, Tourism, NPS Designation, Industry**

Upper Delaware Council

From: Laurie Ramie <laurie@upperdelawarecouncil.org>

Sent: Thursday, January 6, 2022 9:56 PM

To: skinersfallsbridge@aecom.com;

Subject: [External] Upper Delaware Council Response to Skinners Falls Bridge Document

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

January 6, 2022

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

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

Dear Ms. Williams,

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

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

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

It is highly presumptuous to include "emergency response vehicles" as a definitive Purpose component. The document later states that local emergency response vehicles weigh in the range of 15-31 tons for certain fire trucks. Considering that the single-lane bridge was constructed with a 9-ton weight limit, reduced to a 7-ton posting in 2007 and further downgraded to 4 tons in 2013, declaring that category of vehicle as a required use appears to set an unachievable standard of inadequacy for the bridge's restoration to its original capacity from the very first sentence. However, note that when this project's Planning and Environmental Linkages (PEL) public survey asked the question, "*Beyond your personal usage, what types of vehicles/users need to have access to the bridge to meet local needs?*", respondents prioritized:

1. Personal cars or trucks; 2. Pedestrians; 3. Bicycles; 4. Ambulances; and 5. Small Delivery Vehicles. The three types of usage least selected were: 6. Recreational Vehicles/Boat Trailers; 7. Large Trucks/Fire Trucks/Tractor Trailers; and 8. Buses. Clearly not every possible use of this bridge is deemed appropriate or necessary for this location served by weight-posted roads. Emergency responders in the Upper Delaware River Valley have made reasonable accommodations over the bridge's 118-year existence to use modern two-lane concrete alternatives at short distances away in Narrowsburg and Cochection rather than this 13-foot-wide, timber plank deck crossing.

The draft document offers these three Needs statements:

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

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

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

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

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

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

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

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

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

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

As a member of the Skinners Falls-Milanville Bridge Project Advisory Committee and a Section 106 Consulting Party, the UDC reiterates its opposition to any alternative to eliminate this

crossing or to replace it with a standard-issue new bridge. We understand this rare design to be one of only three such truss types among 135 highway bridges owned by PennDOT that has not been demolished as of 2019. "Minimization and mitigation of cultural and environmental impacts" such as erecting a plaque to memorialize this historic bridge would pale in comparison to the opportunity to save this treasured historic gem that we believe adequately fulfills the transportation needs of the people and places that it serves.

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

Sincerely,

Andrew Boyar,
UDC Chairperson

Cc: Neil Shemo, Project Manager, AECOM
Richard Roman, PennDOT Transportation District 4 Executive
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Joseph Salvatore, NPS Upper Delaware Scenic and Recreational River Superintendent
Cody Hendrix, NPS UDSRR Community and Land Use Planner

Laurie Ramie, Executive Director
Upper Delaware Council, Inc.
P.O. Box 192, 211 Bridge St.
Narrowsburg, NY 12764
(845) 252-3022; Fax 252-3359
www.upperdelawarecouncil.org
laurie@upperdelawarecouncil.org





Upper Delaware Council

P.O. Box 192, 211 Bridge Street, Narrowsburg, New York 12764-0192 • (Tel.) 845-252-3022 • (Fax) 845-252-3359
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January 6, 2022

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

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

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

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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 Cohecton - 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*

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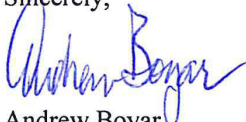
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Cc: Neil Shemo, Project Manager, AECOM
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Joseph Salvatore, NPS Upper Delaware Scenic and Recreational River Superintendent
Cody Hendrix, NPS UDSRR Community and Land Use Planner

Please refer to Responses to Specific Comments

Upper Delaware Council

From: Laurie Ramie <laurie@upperdelawarecouncil.org>
Sent: Wednesday, January 12, 2022 2:05 PM
To: skinersfallsbridge@aecom.com;
Subject: [External] RE: Upper Delaware Council Response to Skinners Falls Bridge Document

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

Laurie Ramie, Executive Director
Upper Delaware Council, Inc.
P.O. Box 192, 211 Bridge St.
Narrowsburg, NY 12764
(845) 252-3022; Fax 252-3359
www.upperdelawarecouncil.org
laurie@upperdelawarecouncil.org



From: Laurie Ramie
Sent: Thursday, January 06, 2022 9:56 PM
Subject: Upper Delaware Council Response to Skinners Falls Bridge Document

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

January 6, 2022

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

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

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The Milanville Bridge – from 1901 to 2017



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



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

A Bridge for Milanville

The Upper Delaware River at Milanville

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

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

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



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

A \$14,000 Investment



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

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

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

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

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

Milanville's Timber Industry

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



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

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

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

"Rafting Rock"



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

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

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

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

Opening Doors

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

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



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

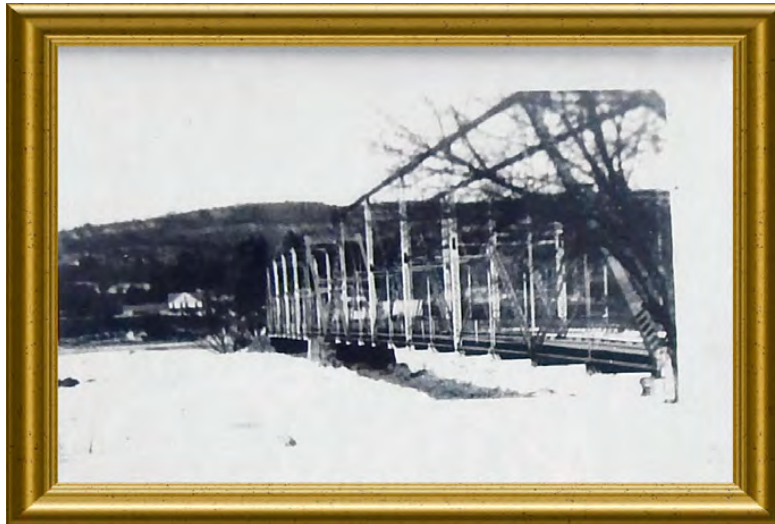


Looking toward the Milanville Bridge, whose NY portal is behind a tree in the left center. A crossing signal marks the former road bed of the Erie Railroad, maintained today by a local, short-line railroad.

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

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

Floods and Ice Jams



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

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

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



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

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



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

The Artistry of 1901 Bridge Builders



Decorative crests on NY and PA portals.



A corner crest in summer light.

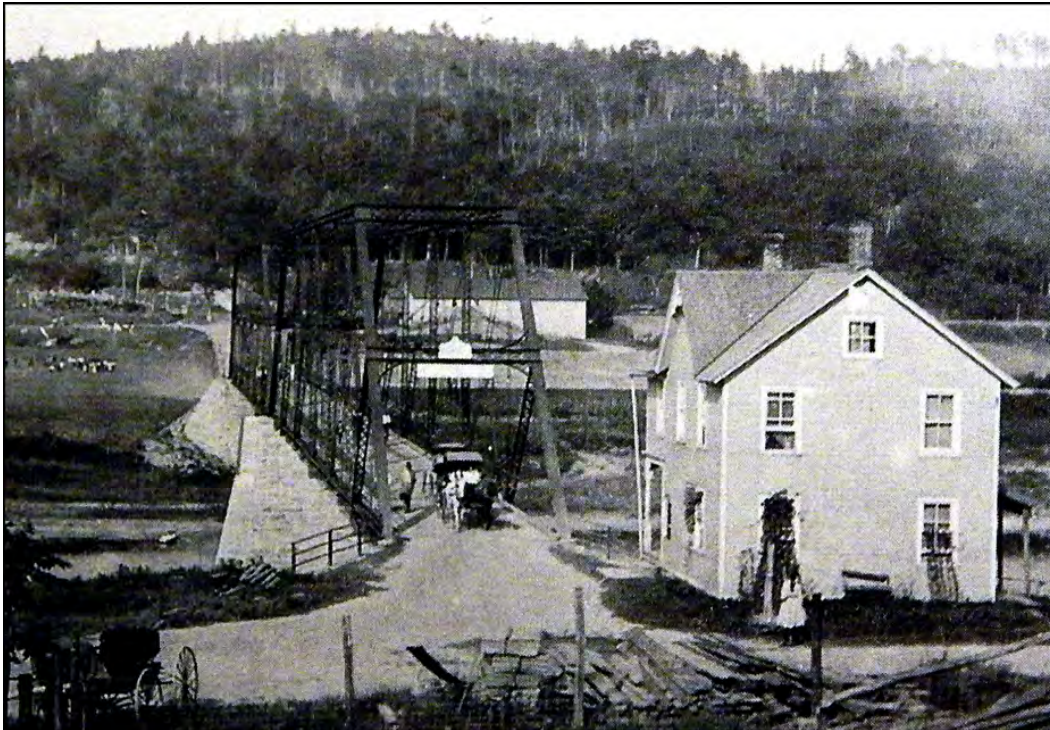


Flower motifs on bridge railings.



Struts and trusses.

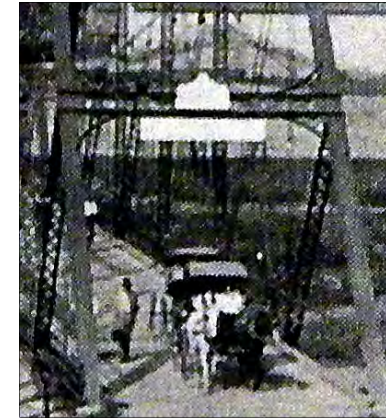
A Team and Carriage Entering Milanville – Undated Photograph



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

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

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



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



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

What's a Baltimore Truss?

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

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

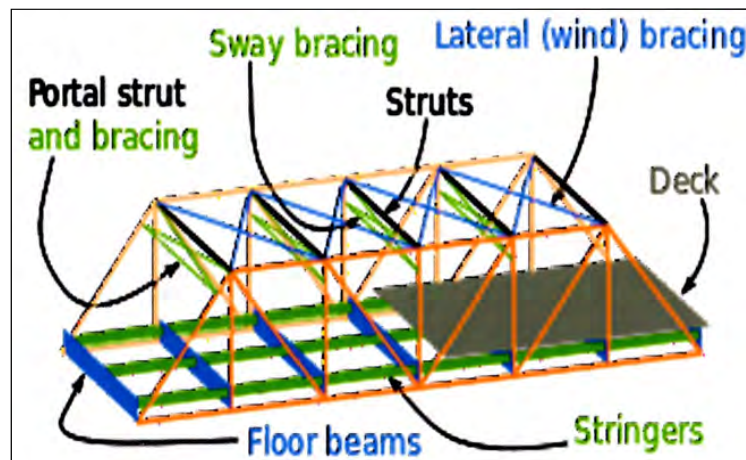


The diagram (left) has many triangles large and small: an engineering strategy that spreads a load to large areas. A truss bridge is economical to build because it uses materials efficiently.

(diagrams courtesy of Wikipedia)



Note the triangles in our 2004 flood picture.



Maintaining the Milanville Bridge



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

RECENT CLOSINGS

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

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

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

MAJOR RENOVATIONS

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

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

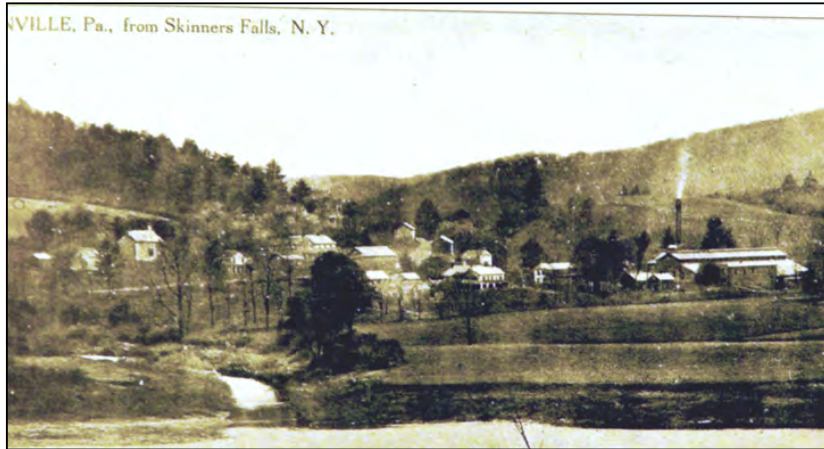


Workmen at the bridge in January 2010. Despite frigid conditions they soon finished the job. Note ice on the Delaware River.

19th-Century Milanville



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



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



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



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

Milanville's Historic District

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



Milanville General Store, c. 1850



Methodist Church, 1910



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



Milton Skinner House near bridge, c. 1900



Milanville School House, c. 1880



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

Bridge Notes (1)

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

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

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

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

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

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

Length: 470 feet

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



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

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

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

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

Bridge Notes (2)

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

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

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

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

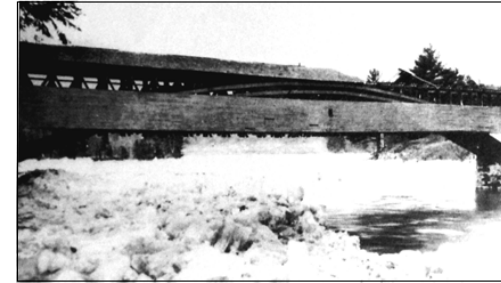
According to Delaware Valley historian Frank Dale, "In 1861 Bill Parks...captained a timber leviathan 60' wide and 190' long that contained more than 120,000 board feet of lumber." During the voyage he and his 12-man crew took aboard 3500 railroad ties.

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

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

Did Upper Delaware communities build wooden covered bridges?

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



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



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



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

The Future...

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

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

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

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

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

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

To contact the writer: ewesely@ptd.net



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

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

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

ATTACHMENT 3

Federal and State Agency Comments

#35 National Park Service

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Friday, January 07, 2022 5:41:23 PM
Last Modified: Friday, January 07, 2022 6:05:24 PM
Time Spent: 00:24:00
IP Address: [REDACTED]

Please refer to Responses to Specific Comments and Responses to the Most Frequently Submitted Comments for the following topics: ***Historic Preservation, Large Trucks***

Q1

After reading the draft Purpose and Need statements, do these statements identify or clearly express the transportation purpose and need(s) for the Skinners Falls Bridge? (choose one)

No, the transportation purpose and need(s) aren't clearly identified or expressed (please use space below to explain).

Please use space below to provide more information if you replied "No" to question one.:

The purpose and need(s) do not reflect the required compliance with the Wild and Scenic Rivers Act. The Skinners Falls-Milanville Bridge is not only listed on the National Register of Historic Places, but it is also an element of the Cultural Resource Outstandingly Remarkable Values that represent the Upper Delaware Scenic and Recreational River. Adverse effects to Outstandingly Remarkable Values cannot be mitigated, they must be avoided or eliminated by minimizing the effect so that it is no longer considered adverse. National Park Service Reference Manual 46: Wild and Scenic Rivers, Appendix K: Section 7 Coordination - National Historic Preservation Act "Under the WSRA Section 7, adverse effects must be avoided or eliminated by minimizing the effect so that it is not considered adverse. Mitigation is not an option. Under the NHPA Section 106, adverse effects must be resolved through consultation with partners (such as SHPOs and THPOs), stakeholders, and the public. Resolving adverse effects may be accomplished by: avoiding, minimizing, or mitigating the adverse effect. If a consulting party, such as a SHPO or THPO objects, then the agency official must consult with the party to resolve the disagreement, or the Advisory Council on Historic Preservation can be invited to review. Under Section 106, consulting parties can agree, then, to resolve an adverse effect by developing a Memorandum of Agreement (MOA) that defines measures to be taken to mitigate the effect of the undertaking, and move forward with the project, even if the resource is ultimately destroyed by that undertaking. It is not acceptable under Section 7, for the WSR administering agency to concur with a decision made through the 106 process that resolves a (direct and) adverse effect, but is still considered an adverse effect for the purposes of the NHPA and results in the degradation or loss of the ORV. This is a key difference - under WSRA, Section 7, a water resources project, for example, cannot move forward if the WSR administering agency determines there will be a direct and adverse effect on WSR values. If the WSR-administering agency makes an adverse effect determination, and the Federal action agency still wants to move forward with the project, it can notify the Secretary of the Interior (or Agriculture) 60 days in advance of requesting Congressional authorization/appropriation for the project (Section 7 of the WSRA.). Congress makes the final decision about whether to implement the project,

notwithstanding the adverse Section 7 determination. This provision has been used very rarely and we are not aware of cases where it has been used to address cultural resource protection. The recommended best practice is to seek resolution at the local level. There are several cases where historically significant bridges have been upgraded using a resolution package that retains the overall appearance of the bridge that is satisfactory to the SHPO and WSR-administering agency. "

Q2

After reading the draft Purpose and Need statements, are there other transportation purpose(s) or need(s) not identified for the Skinners Falls Bridge? (choose one)

There are transportation purpose(s) or need(s) that have not been identified (please use space below to explain).

Please use space below to provide more information if you replied "No" to question two.:
What are the weight limits on the Narrowsburg and Cochection-Damascus Bridges - are these not sufficient for vehicles that are too heavy to cross the Skinners Falls Bridge?

Q3

Please use the space below to share any other comments or concerns about the transportation draft Purpose and Need document.

Please change "Upper Delaware National Park Service" to "Upper Delaware Scenic and Recreational River on page 3. The use of the term "recreation area" on page 4, section 3, is mis-leading. The bridge happens to be located within a recreational segment of the Wild and Scenic River, but it is not appropriate to call the entire river corridor a "recreation area". It may be more clear to state that "This section of river protected under the Wild and Scenic Rivers Act and managed by the NPS, saw an average of....."

Q4

Other

Which of the following best describes your interest in the project? (May select more than one option)

Q5

Please provide the following information to ensure your comment is considered in the study

First Name and Last Name	Lauren Hauptman, on behalf of Cody Hendrix
Company (Optional)	Upper Delaware Scenic and Recreational River
Address (Optional)	274 River Road
City/Town	Beach Lake
State	PA
Postal Code	18405
Email Address	lauren_hauptman@nps.gov
Phone Number (Optional)	570-493-6963

National Park Service

From: Hauptman, Lauren <Lauren_Hauptman@nps.gov>

Sent: Friday, January 7, 2022 8:05 PM

To: Williams, Susan (PENNDOT) <susawillia@pa.gov>; skinersfallsbridge@aecom.com

Cc: NPS UPDE MT <UPDE_MT@nps.gov>; Laurie Ramie <laurie@upperdelawarecouncil.org>; Diehl, Emma <emdiehl@pa.gov>

Subject: [External] NPS Response to Skinners Falls Bridge Document

Hi Susan,

I submitted the NPS response via the Public Comment Form on behalf of Cody Hendrix, but did not receive a satisfactory confirmation that our responses were submitted (e.g. a "Thank you for your response" screen), so I am copying them below to ensure that they are received.

1. Do these statements identify or clearly express the transportation purpose and need(s) – No
NPS Response: The purpose and need(s) do not reflect the required compliance with the Wild and Scenic Rivers Act. The Skinners Falls-Milanville Bridge is not only listed on the National Register of Historic Places, but it is also an element of the Cultural Resource Outstandingly Remarkable Values that represent the Upper Delaware Scenic and Recreational River. Adverse effects to Outstandingly Remarkable Values cannot be mitigated, they must be avoided or eliminated by minimizing the effect so that it is no longer considered adverse.

[National Park Service Reference Manual 46: Wild and Scenic Rivers](#), Appendix K: Section 7 Coordination - National Historic Preservation Act

"Under the WSRA Section 7, adverse effects must be avoided or eliminated by minimizing the effect so that it is not considered adverse. Mitigation is not an option.

Under the NHPA Section 106, adverse effects must be resolved through consultation with partners (such as SHPOs and THPOs), stakeholders, and the public. Resolving adverse effects may be accomplished by: avoiding, minimizing, or mitigating the adverse effect. If a consulting party, such as a SHPO or THPO objects, then the agency official must consult with the party to resolve the disagreement, or the Advisory Council on Historic Preservation can be invited to review. Under Section 106, consulting parties can agree, then, to resolve an adverse effect by developing a Memorandum of Agreement (MOA) that defines measures to be taken to mitigate the effect of the undertaking, and move forward with the project, even if the resource is ultimately destroyed by that undertaking.

It is not acceptable under Section 7, for the WSR administering agency to concur with a decision made through the 106 process that resolves a (direct and) adverse effect, but is still considered an adverse effect for the purposes of the NHPA and results in the degradation or loss of the ORV. This is a key difference - under WSRA, Section 7, a water resources project, for example, cannot move forward if the WSR administering agency determines there will be a direct and adverse effect on WSR values.

If the WSR-administering agency makes an adverse effect determination, and the Federal action agency still wants to move forward with the project, it can notify the Secretary of the Interior (or Agriculture) 60 days in advance of requesting Congressional authorization/appropriation for the project (Section 7 of the WSRA.). Congress makes the final decision about whether to implement the project, notwithstanding the adverse Section 7 determination. This provision has been used very rarely and we are not aware of cases where it has been used to address cultural resource protection. The recommended best practice is to seek resolution at the local level. There are several cases where historically significant bridges have been upgraded using a

resolution package that retains the overall appearance of the bridge that is satisfactory to the SHPO and WSR-administering agency. "

2. Are there other transportation purposes or needs not identified for the Skinners Fall Bridge? – Yes
NPS Response: What are the weight limits on the Narrowsburg and Cochection-Damascus Bridge – are these not sufficient for vehicles that are too heavy to cross the Skinners Falls Bridge?
3. Other comments or concerns:
NPS Response: Please change "Upper Delaware National Park Service" to "Upper Delaware Scenic and Recreational River" on page 3. The use of the term "recreation area" on page 4, section 3, is mis-leading. The bridge happens to be located within a recreational segment of the Wild and Scenic River, but it is not appropriate to call the entire river corridor a "recreation area". It may be more clear to state that "This section of river protected under the Wild and Scenic Rivers Act and managed by the NPS, saw an average of....."

Thank you,
Lauren

Lauren F. Hauptman
Cultural Resource Program Manager
Upper Delaware Scenic and Recreational River
274 River Road
Beach Lake, PA 18405
Mobile: 570-493-6963
<http://nps.gov/upde>

Like us on Facebook! <https://www.facebook.com/updeNPS>

Follow us on Instagram! <https://instagram.com/UpperDelawareNPS>





December 20, 2021

Heather Gerling
DOT District 4-0
400 North Street
Harrisburg PA 171200000

Please refer to Responses to the Most Frequently Submitted Comments for the following topics:
Alternatives, Emergency Response, Large Trucks, Historic Preservation, Tourism, Land Use

RE: ER Project # 2013PR14303.010, FHWA: Skinners Falls Bridge, Damascus Township, Wayne County; Planning Study – Draft Purpose and Need Document

Dear Ms. Gerling,

Thank you for submitting information concerning the above referenced project. The Pennsylvania State Historic Preservation Office (PA SHPO) reviews projects in accordance with state and federal laws. Section 106 of the National Historic Preservation Act of 1966, and the implementing regulations (36 CFR Part 800) of the Advisory Council on Historic Preservation, is the primary federal legislation. The Environmental Rights amendment, Article 1, Section 27 of the Pennsylvania Constitution and the Pennsylvania History Code, 37 Pa. Cons. Stat. Section 500 et seq. (1988) is the primary state legislation. These laws include consideration of the project's potential effects on both historic and archaeological resources.

Proposed Project

The Pennsylvania Department of Transportation (PennDOT), in conjunction with the New York State Department of Transportation and Federal Highway Administration (FHWA), is completing a Planning and Environmental Linkages (PEL) Study to identify a path forward for the Skinners Falls Bridge, which has been closed due to safety concerns since October 2019. The study is currently identifying the transportation Purpose and Need, which will drive the process for the alternatives' consideration, inform the environmental analysis, and support the alternative selection process.

The draft Purpose Statement states that the purpose of the project is to provide a safe and efficient crossing of the Delaware River at Skinners Falls for cars, trucks, trailers, emergency response vehicles, bicyclists, and pedestrians. The draft document identifies three Needs: 1. The Skinners Falls Bridge is currently closed to traffic due to its condition, which limits efficient access for residents, businesses, and recreational users; 2. Emergency response is negatively affected by the absence of a functional bridge in the vicinity of Skinners Falls; and 3. The Skinners Falls Bridge does not provide adequate accommodations for pedestrians, bicyclists, and recreational users in the area.

PA SHPO Comments

PA SHPO, as an identified Participating Agency in the PEL process, offers the following comments, as they relate to the Draft Purpose and Need Document and as outlined in the Comment Form provided.

1. After reading the draft Purpose and Need statements, do these statements identify or clearly express the transportation purpose and need(s) for the Skinners Falls Bridge?

PA SHPO does not agree that the transportation purpose and needs are clearly identified or expressed. While our office recognizes the poor condition of the bridge that has forced its closure, there have been successful historic bridge rehabilitation projects throughout the Commonwealth that have successfully resulted in an increased weight capacity. The reported 388-vehicle daily traffic count (thus, qualifying it as a very low-volume roadway/bridge) prior to the bridge's closure should be considered in the Purpose and Need, particularly with regards to the required weight limit. The

emergency vehicles noted in the documentation generally range in tonnage from 4.5 to 15 tons with exceptions being tankers and engines, which range in weight between 15 and 31 tons; however, as these larger vehicles appear to be the exception. Therefore, in our opinion, the need to bring the bridge up to a 30–40-ton weight, as alluded to in the draft document, is unsubstantiated. More tangible, fact-based information on the frequency of need for vehicles weighing greater than 15 ton to cross the bridge is necessary.

With regards to pedestrian, bicyclists, and recreational user access, the document notes that “approximately 80% of survey respondents indicated bicycle or pedestrian access to the bridge is needed”. While we recognize such use is a need for the bridge, we want to ensure that consideration is given to rehabilitation and retention of the existing bridge to continue to accommodate these modes of traffic as there is no supporting documentation provided to suggest that the bridge, when opened, operated in an unsafe manner for these traffic types.

2. After reading the draft Purpose and Need statement, are there other transportation purpose(s) or need(s) not identified for the Skinners Falls Bridge?

PA SHPO notes that there are other transportation purposes/needs that are not identified – mainly the role of the bridge itself as a tourist destination and significant historic property. The bridge is not only individually listed in the National Register of Historic Places but serves as the prominent eastern anchor for the National Register-listed Milanville Historic District. The Baltimore Thru truss bridge was identified as part of the *2017 Reevaluation of Metal Truss Bridges* as an exceptional preservation priority, noting its significance as an uncommon type; early example of its type and design for the state; earliest example of its type and design for the engineering district; regionally rare and retaining significant artistic value. The role of the bridge within the local and regional history was expressed numerous times at both the virtual public meeting held on March 30, 2021, as well as in the project survey conducted between March and June of 2021 and again expressed by our agency as well as the National Park Service at the Agency Coordination Meeting held on October 27, 2021. The National Park Service, Upper Delaware Scenic and Recreational River, expressed its support for the repair and rehabilitation of the Skinners Falls Bridge in their letter of June 17, 2021, noting it as an element that supports two of the Upper Delaware River’s Outstandingly Remarkable Values (cultural and scenic). Furthermore, the letter expressed that the Skinners Falls Bridge is integral to recreation on this part of the river. As such, supporting the local economy and land use by minimizing impacts to the bridge so it continues to convey its appearance and historic character should be recognized as transportation needs.

3. Any other comments or concerns about the draft transportation Purpose and Need document.

As noted previously, the Skinners Falls Bridge is an exceptionally rare, unique example of its type and should be given the highest utmost consideration for preservation (rehabilitation) as part of transportation planning. Local residents, recreational users, and tourists consider this bridge a destination; the connection between land use and the historic crossing should be factored into the planning process.

PA SHPO looks forward to continued consultation under the PEL, particularly as it relates to the project’s potential to affect historic properties. For questions concerning this review and/or for future consultation, please contact Emma Diehl at emdiehl@pa.gov.

Sincerely,



Emma Diehl

Environmental Review Division Manager

U.S. Environmental Protection Agency

From: Davis, Jamie <Davis.Jamie@epa.gov>
Sent: Monday, February 7, 2022 10:15 AM
To: Moore, Julia; Nevshehirlan, Stepan
Cc: Austin, Mark; Nyer, Samantha
Subject: [EXTERNAL] Skinners Falls Bridge Project Purpose and Need

Hi Julia,
EPA Region 3, in consultation with EPA Region 2, has reviewed the Purpose and Need section of the Skinners Falls Bridge project found on the PennDot website. At this time, we do not have any comments to provide on this section. We look forward to working with you as this project moves forward through the NEPA process.

If you have any questions please feel free to contact me directly,
Thanks and have a great day
Jamie

Jamie Davis
Office of Communities, Tribes & Environmental Assessment
National Environmental Policy Act (NEPA)
U.S. EPA Region III
1650 Arch Street
Philadelphia, PA 19103
570-351-7192

ATTACHMENT 4

PennDOT Response Letter to Greenworks Law and Consulting LLC, issued January 20, 2022



January 20, 2022

SENT VIA ELECTRONIC MAIL: lmw@greenworkslawconsulting.com

Wayne and Sullivan Counties
Damascus Township and Town of Cochection
State Route 1002 Section 651
Skinners Falls Planning and Environmental Linkages Study

Lauren M. Williams, Esq., Owner/Head Counsel
Greenworks Law and Consulting LLC
8 Atkinson Drive #1746
Doylestown, PA 18901

Dear Attorney Williams:

This is in response to your email dated December 10, 2021 and letter dated December 18, 2021 from Damascus Citizens for Sustainability (DCS) regarding the Skinners Falls Bridge Planning and Environmental Linkages (PEL) Study and draft Purpose and Need document.

We appreciate your feedback on the PEL Study and draft Purpose and Need document. The PEL Study for Skinners Falls Bridge seeks to establish an understanding of the transportation needs, along with the past and future uses of the bridge. The PEL process is collaborative and provides flexibility in project delivery. The PEL process was added to the Federal Highway Administration's planning regulations in 2007. PennDOT is currently using this approach on several projects throughout the Commonwealth¹. The Frequently Asked Questions document on the project website² provides more information on the PEL process.

PennDOT is committed to following the public involvement requirements outlined in 23 CFR 450.212 (b)(2) and 23 USC 168 (d) throughout the PEL Study. The results of the draft Purpose and Need document were shared with the Project Advisory Committee (PAC) on September 23, 2021, and then shared at an Agency Coordination Meeting (ACM) on October 27, 2021. Subsequent to those meetings, the availability of the draft Purpose and Need document and public comment period was widely advertised through local postcard mailings, newspaper advertisements in the Sullivan County Democrat, Times Herald-Record, and Tri-County Independent, and email notifications to agencies, Tribal Governments, elected officials, and members of the public who have requested project notifications. A digital version of the draft Purpose and Need document is

¹ For example, the State College Area Connector PEL (<https://www.penndot.gov/RegionalOffices/district-2/ConstructionsProjectsAndRoadwork/SCAC/Pages/default.aspx>) is in progress, and the US 219: I-68 (MD) to Meyersdale (PA) PEL was recently completed.

² <https://www.penndot.gov/RegionalOffices/district-4/PublicMeetings/Wayne%20County/Pages/Skinners-Falls-Bridge-Project.aspx>

accessible on the project website. Hardcopies of the document have been placed at the Milanville General Store and two local branches of the Western Sullivan Public Library; it may also be mailed by request through the project email address or hotline. PennDOT established the public review and comment period in consideration of the federal regulations and codes stated above. In consideration of your comments and the recent holiday season, PennDOT has decided to extend the draft Purpose and Need public review and comment period through February 7, 2022.

Your comments have been noted and will be considered as the Purpose and Need document is finalized. After the close of the comment period on February 7, 2022, PennDOT will prepare a summary of comments received. All persons who submitted comments, including Greenworks Law and Consulting LLC and DCS, will be notified when the summary document is available.

Public involvement is an ongoing process and will continue throughout the Skinners Falls Bridge PEL Study and into the National Environmental Policy Act process. Previous public input solicited during the PEL Study has been incorporated into the draft Purpose and Need document. A summary of the previous public input received is available on the project website². The public will be invited to review and comment on the future Skinners Falls Bridge PEL Study Report.

If you have any questions, comments or would like to be added to the project mailing list to receive future updates on the Skinners Falls Bridge PEL, please contact the project hotline at 610.234.5148 or skinnersfallsbridge@aecom.com.

Sincerely,



Richard N. Roman, P.E.
District Executive

cc: Damascus Citizens for Sustainability, DCS@DamascusCitizens.org
Laurie Ramie, Upper Delaware Council
Richard N. Roman, P.E.
Susan E. Hazelton, P.E.
Susan Williams

² <https://www.penndot.gov/RegionalOffices/district-4/PublicMeetings/Wayne%20County/Pages/Skinners-Falls-Bridge-Project.aspx>