

SYNOPSIS OF SWALLOW FALL BRIDGE PUBLIC COMMENTS

There's an error in your last email. Swallow Falls Road never intersects with Hoyes Run Road.

"...will directly impact visitors and neighbors of Swallow Falls State Park and users of Swallow Falls Road between Cranesville Road and Hoyes Run Road."

It is unclear in the County/State application what exception they are requesting regarding the protections of the Wild designated Youghiogheny and its associated scenic corridor related to the Swallow Falls Bridge Replacement Project. Multiple bridge and road alignment options are presented in their application materials, each with different impacts to the Wild River and the scenic corridor. Are they requesting exceptions related to their preferred options (Options 2C - removal of 2.16 acres of old-growth forest, and 2D = removal of 2.41 acres of old-growth forest) or some type of blanket exception to move the ROW where they see fit removing any required vegetation, removing natural rock features, and impacting wetlands as needed (pending NEPA review)?

Thank you for clarification on the request.

Thank you, Mary,

I look forward to meeting you at the hearing!

I continue to have significant concerns about this application, and among the most noteworthy are the statutory bases on which any exceptions might be granted. [See Paul Durham's email.](#)

I appreciate your responsiveness both by phone and email.

Mary this is very helpful, thank you. If only the Youghiogheny River Advisory Board had been consulted and the least impactful option put forth, I'd still be interested, but would have much less angst about the process. Look forward to seeing you on Monday.

On Fri, Jul 7, 2023 at 4:47 PM Swallow Falls Bridge -DNR- <swallowfallsbridge.dnr@maryland.gov> wrote:
Hi,

At this stage of design, which is still conceptual, the County's application is requesting an exception to the prohibition of activities that would affect the Scenic and Wild River and its scenic and wild character. Any project involving construction of a new bridge will involve impacts and requires an exception. The County has indicated a preference for Option 2D. As stated in the environmental assessment requirements in the application, an analysis of alternative locations, development methods, or project sequencing is required. In Item 8 of the application, a description of alternatives to the proposed project that could avoid or minimize impacts associated with the project is also to be included. As a part of the application, the options and the analysis of each option are being presented for review and public comment.

The provisions of COMAR 08.15.03.03 specify that the Department can grant, conditionally grant, or deny the request for an exception. This language allows for specific conditions of approval that could be tied to one of the options presented and could include the location of the ROW, limits on clearing, and restrictions related to other natural resource impacts, including required mitigation or offsets.

I hope this is helpful.

Mary Owens

It is unclear in the County/State application what exception they are requesting regarding the protections of the Wild designated Youghiogheny and its associated scenic corridor related to the Swallow Falls Bridge Replacement Project. Multiple bridge and road alignment options are presented in their application materials, each with different impacts to the Wild River and the scenic corridor. Are they requesting exceptions related to their preferred options (Options 2C - removal of 2.16 acres of old-growth forest, and 2D = removal of 2.41 acres of old-growth forest) or some type of blanket exception to move the ROW where they see fit removing any required vegetation, removing natural rock features, and impacting wetlands as needed (pending NEPA review)?

Thank you for clarification on the request.

In preparation for the July 10 DNR hearing on the proposed bridge replacement, below are questions I'd like to discuss with engineering staff at the hearing.

I understand the bridge proposed to be replaced is a temporary span, constructed above the prior bridge, using "temporary concrete stub abutments placed behind the crib wall abutments" that, along with a concrete pier, supported the existing bridge below it (GPI Environmental Assessment, June 2023).

I haven't been able to find information on the age and integrity of the (1) existing crib wall abutments and concrete pier (1960?), and (2) temporary concrete stub abutments (10 years old?). Are the temporary abutments receiving any support/stability from the existing abutments? Would you be able to provide information on the latest inspection of the bridge(s)? Because the existing bridge has not been in use, when was the last time those crib wall abutments and concrete pier were inspected?

Since minimal impacts to the Wild Yough Corridor are mandated by legislation and the 1996 management plan, knowing whether or not structures in place (existing and temporary) have the integrity to support a much more modest, yet serviceable, bridge than the 35' width proposed in all options in the GPI report, is important.

If you are able to provide this information, such as a copy of relevant inspection reports, that would be most helpful.

I would also like to know if you've developed a proposed funding formula for bridge replacement options? GPI reports using a combination of local and federal funds. I understand that federal funding might dictate minimum bridge construction requirements.

If federal funding is necessary to replace the bridge, are there federal minimum requirements for lane width and number of lanes? In other words, and for example, could a one lane bridge be federally funded, along with signaling to allow orderly use of such a bridge? Since the Wild and Scenic Rivers Act of 1968 is federal legislation that enabled the Wild Youghiogheny designation, are there exemptions to construction specifications within federal transportation funding to preserve the wild nature of the corridor?

Thank you for your attention to this request for information.

Please accept the following review article and commentary as written testimony re: the proposed Swallow Falls bridge replacement.

Garrett County's proposal and GPI's environmental assessment fail to appropriately value the 37 acre old-growth grove of hemlock and pine that this proposed project would significantly degrade. The article linked below provides important background that should be considered in such a proposal.

I have excerpted one area of concern, which is carbon sequestration. This is meant to be illustrative, and I would encourage you to read the entire paper, which details other potential impacts.

GPI reports (p. 16, section 2.12 Wild Character) that “. . . reforestation will mature and integrate into the surrounding environment.” This conclusion grossly minimizes, if not ignores, the significance of what is lost in removal of old-growth and specimen trees.

From section 2.2, Impacts on Atmosphere
(Forest-clearing to create early-successional habitats: Questionable benefits, significant costs; Kellett et al., 2023)

The amount of carbon lost when cutting a mature or old-growth forest is not recovered by fast-growing

Fahey et al., 2005 Petrenko and Friedland, 2015

can mobilize and release soil carbon for decades (Nave et al., 2010; Petrenko and Friedland, 2015; Lacroix et al., 2016). It can take from 60 to 100 years for soils on a site to recover from clearcut logging (James and Harrison, 2016).

<https://www.frontiersin.org/articles/10.3389/ffgc.2022.1073677/full#B280>

Thank you for inclusion of this testimony in DNR’s evaluation of the County’s proposal.

* CORRECTION*

To whom it may concern:

Please accept this correction to the last paragraph in my earlier email to you today. The enabling legislation for the 21 mile section of the Yough being designated Wild was through the Maryland Scenic and Wild Rivers Act of 1968. Therefore, my question about federal transportation funding exemptions likely does not apply.

First, I would like to appreciate you for holding this hearing in Garrett County in person and virtually thereby providing the greatest opportunity for participation by the local community.

In the process of making decisions about the replacement of the Swallow Falls bridge I am writing to ask for as much civic engagement as possible, including input from the Youghiogheny Scenic & Wild River Citizens Advisory Board. Because those of us in Garrett and Allegany counties are most directly affected, as many of us in far western Maryland as possible need to be involved in this process.

Also, most important in any decision about the replacement of this bridge is to assure the very least amount of damage to the **Wild Youghiogheny Corridor** and that the replacement be consistent with state and federal laws and regulations. Two relevant policies/programs follow:

“The policy of the State of Maryland is to preserve and protect the scenic, geologic, ecologic, historic, recreational, agricultural, fish, wildlife, cultural, and other values of its scenic rivers; as well as to enhance their water quality, and fulfill vital conservation purposes by wise use of resources within their surrounding

now *more* identified old-growth specimens in Swallow Falls State Park as noted in the assessment. This is wonderful news and I applaud MD DNR's efforts.

However, the environmental assessment states, "*removal of environmentally sensitive habitat such as old growth hemlock forest and specimen trees along Swallow Falls Road will be unavoidable. Clearing and grading will be required for the installation of abutments for the new bridge as well as to accommodate the wider bridge and roadway.*" This action of removing identified old-growth trees on state park lands is in direct violation of HB884-State Land Conservation-Old-Growth Forest Management that was signed into law in May 2022. [Here is a link to the bill.](#)

The assessment also states "*mature areas of old-growth hemlock forest to be removed will be replaced with young trees during reforestation.*" There is simply no short-term replacement for old-growth trees. Newly planted forests require many decades, even centuries, before they sequester carbon dioxide in substantial quantities. There is also no guarantee reforestation efforts will yield the same high ecological conditions of the original forest. Reforestation is simply not an equal substitution for an already established and complex old-growth ecosystem.

Clearcutting one acre of old-growth or the logging of three old-growth specimens might seem inconsequential, but with so few acres of these increasingly rare forests in Maryland left, every tree matters. We cannot afford to lose any more of the last remaining old-growth in our state.

To quote the Maryland DNR: "**Future policy should address management and protection of the identified Old Growth. Old Growth identification should continue so that a continuous framework of suitable stands is developed across the state. On a landscape level, efforts also should be made to incorporate mature stands that approach the old-growth definition. Such measures would ensure that the biological diversity of Maryland's forests would be maintained for future generations.**" (Page IV. Executive Summary. The Maryland Old Growth Forest Inventory 2007)

I urge you to reconsider this project and find an alternative solution that does not remove any of the old-growth or mature trees in Swallow Falls State Park.

Thank you for allowing me to submit this testimony in the DNR's evaluation of the County's proposal.

To Whom it May Concern,

I am the founder of the Old-Growth Forest Network and I represent thousands of Maryland citizens who want to preserve the remaining old-growth forests in Maryland.

I am writing to request a denial of the application to expand the footprint of the bridge in and adjacent to Swallow Falls State Park. There are many reasons to deny this application but I will focus on the impacts to the forest. As noted in the environmental assessment, the area to be destroyed includes old-growth Hemlock, Oak, Cherry, and Maple trees. Some of these trees are 300 years old, thus they are older than the United States of America.

The old-growth forests remaining in Maryland are exceedingly rare, estimates are that only 0.1% remain. Of the half million acres of land owned by the state only 2,300 acres are considered old growth. With the passage of the Old- Growth Forest Conservation bill last year, it is illegal to cut any of these remaining forests on state land. Our organization stands ready to take legal action if necessary. "Restoration" by replanting will never replace the magnificent, historic, trees the county wants to cut.

The forests in Swallow Falls have been considered special for generations. Thomas Edison, Henry Ford, President Warren Harding and President Calvin Coolidge have all visited and camped there. Thus, the old-growth forests near this bridge have historical as well as ecological importance. It has taken generation after generation of humans to preserve this special place, let's not let our generation destroy even a little of it.

My name is Sonia Demiray, I am the co-founder of the Climate Communications Coalition Our partners include Climate Forests, Eastern Forests, the Dogwood Alliance, and many environmental conservation and climate justice organizations across Maryland and beyond. I am also active in Maryland Forestry. We strongly urge the Maryland Department of Natural Resources (MDNR) to deny Garrett County and the Maryland Department of Transportation's (MDOT) application for an exception to the protective regulations, because this would allow for the construction of a bigger and more intrusive bridge in this protected park. Following are three important reasons:

The Youghiogheny River is one of nine rivers that are recognized under the Maryland Wild and Scenic Rivers Act as a State Scenic River. It also has [21 miles of special 'wild and scenic'](#) designation, which awards it a special protective status by the state of Maryland. It is precisely these 21 miles that are in Garret County: ["The Yough is included under this act due to the substantial natural values it possesses, such as the outstanding white water, the scenic beauty of narrow, heavily forested gorges, and the abundance of trout fisheries. The act strives to keep the river in the free-flowing condition it is in. It is up to the state and local governments to enforce the act."](#) A larger bridge that will fundamentally harm the Wild and Scenic Youghiogheny River and its banks (as per the application itself) is wrong and unnecessary.

[Swallow Falls State Park has 37 acres of remaining Old-Growth Forest in Maryland](#) – it is one of only 40 sites that have old growth left in the state. In addition, it is one of only two sites, together with Rocky Gap State Park, that have old growth hemlock and pine. Only 2,300 acres of state-owned old growth remain in the entire state according to *DNR's 2007 Old-Growth Inventory*. This old-growth grove is also home to specimen trees: trees that have been named and designated specimen for their unusual age, shape, and splendor. Old growth forests today are more important than ever as they provide reservoirs of genetic diversity and unique genetic memory which increases the resiliency of younger forests when shared through the rhizosphere. This resiliency is necessary for forest health and crucial to withstand climate change. In addition, old growth forests are the most effective at carbon capture and as carbon sinks. Old growth is also the most important habitat for approximately 40% of the animal species listed as rare, threatened, and endangered in Maryland – and- in total, 145 species of Greatest Conservation Need are supported by this key habitat (Maryland Old Growth Forest Inventory). Finally, in 2022, Maryland passed the [Old-Growth Forest protection law](#) which prohibits felling these important trees. For all these reasons, we must say no to a newer, larger bridge that will require logging unique old growth trees and adds significant stressors to the little old-growth and virgin wildlife habitat that remains in the state.

“A [State Park](#) is established by a state to preserve a location on account of its natural beauty, historic interest, or recreational potential.” Emphasis in “preserve.” Swallow Falls is one of Maryland's most breathtaking, irreplicable, and irreplaceable State Parks. For this reason we

must say no to a newer, larger bridge that will only increase traffic through this wild and scenic corridor.

In short, the park is a preserve, the river is a designated wild and scenic river, and old growth is protected by its own law. There are three different layers of protection on these unique natural resources. Today, the MDOT and County officials are asking the MDNR to ignore all three of layers of protection and permit an exception in order to build a new and bigger bridge. The proposed work will necessarily affect the designated and protected scenic and wild river, its banks, the corridor, endangered wildlife, and harm the 37 acres of unique and irreplaceable old growth, since the bridge will go over, through, and alongside it.

We call on the MDNR to deny this exception. The MDNR must be true to its mission of “securing a sustainable future for our environment, society, and economy by preserving, protecting, restoring, and enhancing the State's natural resources.”

The MDOT must re-route traffic away and around these Nature Preserves. The old growth forests and the river have been in this location for thousands of years, they cannot be moved, and their protections must be respected.

While I understand the importance of replacing a bridge that was supposed to be temporary, I don't understand the need for a 35' wide bridge with sidewalks and a bike lane, especially since the road on either side has neither sidewalks nor a bike lane. I fear that constructing such a large bridge will lead to widening the road, and I'm especially concerned that the old-growth trees in the area will be endangered. So much time, money, and effort has gone into protecting hemlocks from the woolly adelgid; it would be distressing for the majestic hemlocks in this forest to be destroyed for greater human access.

These comments are meant to complement my oral testimony of July 10, 2023.

Of the proposed options under consideration only those that maintain the current one lane bridge during the replacement project should be considered.

Because County residents on either side of the bridge rely on it for day to day activities and it is needed for tourism activities at Swallow Falls State Park.

Any new bridge must be a two lane bridge that meets the standards of the Federal Highway Administration. After all it is the federal bridge credits that are being used as a major source of funding for this project !

There is no need to explore a smaller, less wider bridge as was advocated at the public hearing by some of the participants. I would remind the Secretary that it was originally a 2-lane bridge in 2011 and it needs to be that when the so-called temporary bridge is replaced. This has to be because a 2-lane bridge facilitates access for emergency and agriculture equipment.

Finally, there needs to be an investigation ior explanation into why

it has taken more than a dozen years for the department to begin to move this project forward
The County was originally informed that it would take 5 years to accumulate enough federal bridge credits to begin the project but it is now over a dozen years later. Why ?

We wish to provide the following comments on the Swallow Falls Bridge Replacement Project:

We recently attended the 10 July public hearing on the bridge project. We appreciate the DNR providing this information on the project and giving the public the opportunity to provide feedback.

- 1) A bridge should remain open during construction. This bridge is a critical artery to our family that we use almost everyday. It provides us with access to commerce (in the northern area of the county), vital emergency medical services, and a transportation route to other areas in the surrounding counties. For us, it is important that a bridge remains open during whatever replace plan is chosen.
- 2) The replacement bridge should be a two lane bridge. For a long time we had a two lane bridge and the replacement plan should provide that level of service. As highlighted in the public hearing, a two lane bridge will allow larger fire equipment to come from the Deep Creek area saving valuable time in an emergency situation.
- 3) The bridge should be two lanes, but it doesn't need to be 35 ft wide. We now understand some of the requirements that come with some of the money, but we think the county should do what they can to minimize the size. We don't need bike lanes since the road doesn't have bike lanes and we really don't need a side walk since it puts pedestrians back into a traffic lane once they cross the bridge, creating a hazard.
- 4) Several of the plans and renderings show high walls on one or both sides of the bridge. The high walls are very close to the traffic lanes. This is not going work very well in a Garrett County winter. As snow get plowed, it not going to have anywhere to go. It's going to be a mess in the road and create a potential hazard for plow operators and commuters. You must take this into consideration in your planning phase.
- 5) Our property backs up to the river and is about a half mile from the bridge. As a result, we spend a lot of time on the river. We understand the sensitivity of the river and surrounding area, but if some trees have to be cut to accomplish the project, then that is what you need to do. Minimizing impact is important, but accomplishing the replacement of the bridge is just as important.

Thank you for considering this comments.

Having read the recent media coverage and listened to the comments made on the public record thus far it would seem that the first hurdle that needs to be overcome is the parochial views of all the different players who wish to be involved in this process.

It must be recognized that the various advisory boards (Yough River, Garrett County Forestry, etc.) are just that- they are advisory in nature; they should hold no legal sway over the final decisions made by DNR or SHA. The boards can formulate their advice to the state agencies, but the ultimate decisions rest with DNR and SHA in the best interest of all the citizens of Maryland. Unfortunately, many people gain access to these boards by or with political or personal motives involved, which taints their ability to render an unbiased opinion. And, it is natural for local landowners to desire to have decisions go in the manner that best suits their personal desires.

All that being said, let's consider the history. It was decided long ago that a bridge be put across the river in this area to facilitate travel and enhance public safety. It is my understanding that the original bridge was two laned and the only reason it was not replaced with another two lane bridge at an earlier date were fiscal constraints that the county had to deal with which forced a single lane solution to maintain traffic access in the area.

The wild and scenic designation of the Yough came at a later date and was meant to maintain the integrity of the area to the greatest degree possible. However, that designation did not negate or intend to turn back time to eliminate existing infrastructure or land ownership. If it did then most of the surrounding land along the river should have been taken as public domain and the existing infrastructure removed. I can only imagine the civil war which would have ignited in Garrett County if such actions were even intimated during the wild and scenic river designation of the Yough.

Public access and safety should be the key concerns to be dealt with here by these state agencies. Granted we don't need a 4 lane bridge, but most citizens in the modern world would expect a two lane bridge that meets minimum highway standards. This is especially true if you are promoting the area for recreational purposes with access to state parks.

With regard to bike lanes I can only say that only the brave (or foolhardy) travel most of Garrett County's back roads on bikes, as few of the county roads have actual bike lanes. So until the county is ready to accept the financial burden of improving bike lanes along the existing roads in the area, there seems to be little sense in a bridge that would provide such amenities.

Thank you for the opportunity to comment I wish you Godspeed and good fortune in dealing with the issues.

I favor closing the bridge for the 3 month construction period in order to minimize impacts and the need for extensive exceptions to the Wild-designated Youghiogheny and its associated scenic corridor. Option 1C if narrowed as not to include the bike lanes or sidewalk would be acceptable to me.

Thank you for the opportunity to comment.

Please find attached my personal assessment of what exceptions to the Scenic and Wild Rivers Act, related COMAR regulations and sections of the Youghiogheny Scenic and Wild River Study and Management Plan that would need to be made to allow for construction of the proposed Swallow Falls Road Bridge and road realignment.

While I am not opposed to a replacement bridge being constructed I feel that a blanket exception of these regulations and policies would severely undermine the intent, current and future protections of the natural and visual qualities of the Youghiogheny Wild River and its associated scenic corridor and thus should not be granted without restriction. Any construction should stay within the footprint of the existing bridge and be compliant with as much of the sections in my analysis as possible IMO.

Thank you for helping to protect the Wild Youghiogheny as intended by the Maryland General Assembly.

Build the bridge that is wide enough for bikes, hikers, and the public safety vehicles.
Construct it in a manner that allows traffic to pass through the area without road closures.
The sooner it can be built the better.
Thank you for the opportunity to make comment on this needed project.

Dear Secretary Kurtz:

The Youghiogheny River Natural Environmental Area (NEA) certainly deserves its designation as a Maryland "Scenic and Wild River". It was listed and identified as such by the General Assembly in 1968 when the Scenic and Wild Rivers Act was passed. I had the honor and privilege of being the manager of that wild river corridor for a number of years. At the same time, I was also manager of Deep Creek Lake State Park and the Deep Creek Lake Natural Resource Management Area (NRMA) -the lake. It was a huge responsibility to simultaneously manage three very different units of public land; a state park, a NRMA and a NEA. The Yough is a NEA due to its significant geological features, its rare and certainly threatened flora (by invasives) and its unique fauna, the hellbender, to name just one.

Quoting from the DNR Stewardship of Scenic and Wild Rivers page, "The Scenic and Wild Rivers Act mandates the preservation and protection of natural values associated with rivers designated as Scenic and/or Wild. Each unit of State and local government, in recognizing the intent of the Act and the Scenic and Wild Rivers Program, is required to take whatever action is necessary to protect and enhance the qualities of a designated river."

I remember reading that language in an earlier format (no webpages existed in the late 1990's) and being impressed with what I believed it meant – that the state of Maryland desired to keep that river corridor wild, and as primitive as it existed in that era of the 1960's. It has recently been quite a struggle to keep it in that intended state - wild.

The opening paragraph of the COMAR regulations for the river are clear,

The purpose of these regulations is to implement the intent of the Scenic and Wild Rivers Act for that portion of the Youghiogheny River which has been designated a wild river. These regulations are designed to regulate present and future use and development of the wild river and adjacent land areas to protect their primitive qualities and characteristics, to protect the water quality of the Youghiogheny River, and to fulfill vital conservation purposes by wise use of the resources within the scenic corridor of the Youghiogheny River. For this purpose, a scenic corridor and attendant zones are defined, within which only certain enumerated appropriate uses and developments consistent with wild river designation are permitted.

The Swallow Falls Road bridge should not be replaced by the very large structure and associated approach modifications that are proposed. I believe that the engineers have designed and made justifications for that exaggerated size of bridge and approaches in order to, in the end, settle for whatever scope of work they are permitted exemptions to build. DNR should only accept an application for a bridge structure that would be consistent with the river regulations.

they do not offer an option that I could vote in favor. The only option that I believe would be right for the integrity of this special river resource with so much to protect, would be to close that section of the road and replace the bridge on the existing alignment without building a temporary bridge for traffic. There is no need for a 35-foot-wide bridge and no exemptions should be granted to cut trees and move earth for wider approaches. Federal Highway standards are excessive in this remote part of the county for a bridge that sees less than 500 vehicles pass over it each month.

Garrett County leadership has closed Glendale Road this summer for realignment of a curve. This road is a major east/west artery in the county causing thousands of drivers to take long detours during the busiest season of the year. If they can close Glendale Road in summer, they can close Swallow Falls Road at the bridge for the duration of the replacement.

- Surely the county can find a way to help the farmer move his equipment around to reach his fields during farming season.
- Surely the county (school system) can re-route a school bus or two for a year if there are even students to be transported to school along that stretch of road.
- The EMS response teams made adjustments years ago when the bridge width was reduced to one lane. Depending upon the nature of the incident, they respond to emergencies at Swallow Falls State Park and the river access areas in coordinated manner with personnel and equipment on the appropriate side of the river. They have what I consider to be good responsive coverage from both ends of the road.
- The small gravel area (east end/upstream of the bridge) that is used for parking by anglers is not a legal parking area. It has been getting incrementally larger with each passing year from more and more drivers squeezing in there and disgorging visitors to walk across the bridge into the state park. The proposed Garrett County bridge plan enlarges and establishes this parking area. It should not exist. During bridge reconstruction, parking there should be prohibited and no replacement of that space should be permitted. The area should be reclaimed from gravel and replanted. From the park management perspective, there are several valid reasons for this parking area to be eliminated, consistency with the COMAR regulations for the Yough corridor is just one of them.

Finally, I am confident that you will thoughtfully review everything available to you for this decision – allow exemptions or not, and if allowing, carefully craft those exemptions to be within the regulations. As found in the Exemptions section of the COMAR regulations .08.15.03.03A (1)

- (1) The exception is consistent with the legislative intent of the Scenic and Wild Rivers Act and is not injurious to the scenic and wild character of the river; and ...goes on to (2)

Thank you for your leadership and standing at the helm of a good department.

I'm writing to provide public input for DNR's consideration concerning the replacement of the current "temporary" bridge over the Youghiogheny River near the entrance to Swallow Falls State Park.

First, I'd like to commend the DNR Staff on their conduct of the July 10th public meeting at Garrett College. The DNR Staff, along with Wendy Walcott of GPI, Inc., provided excellent informational material during the "open house" session, and a very comprehensive presentation. The session was well managed and everyone that attended had an opportunity to speak.

My perspective is a little different than most of the people who attended the July 10th session. I live about 1.4 miles from the bridge site. I'm a Garrett County native with deep roots in the Swallow Falls area - generations of my family have lived - and are living - in this area. I grew up in the immediate area and have lived there since returning to the County after my military service. I served as Garrett County Commissioner representing this Swallow Falls District for 8 years from 2014-2022. While I was County Commissioner, our Board made replacement of the temporary Swallow Falls bridge a priority. I've continued to make this project a priority as the Delegate representing this area.

As a result of my experience described above, I believe I'm uniquely qualified to represent the opinion of the overwhelming majority of Garrett Countians on this issue. Many people, who will not attend a public meeting, are quick to share their opinion with me.

As I stated during the public meeting, I'm feel strongly that Swallow Falls Road remain open during the construction period. Reasons could vary with the time of the year, but include access for emergency services, farmers, school buses, tourists, businesses, commuters, hunters, timbering, etc.

Additionally, I urge DNR not to give in to suggestions that the bridge should be of limited width, or one

way. While people who suggested this, and closing of the road, may mean well, they don't have to live with the consequences. Replacement of the bridge is long overdue, a once in a lifetime opportunity, and will serve the area for generations to come. So, let's do it right.

Some at the public hearing expressed concern that construction will cause some disturbance in the area of the bridge. One person even described the bridge site as "pristine." Swallow Falls State Park consist of about 257 acres and the adjoining Garrett State Forest includes about 8,042 acres. Construction of the bridge will disturb an acre or less, which doesn't represent a significant impact. Additionally, the site of the bridge is not pristine. There are two different sets of earlier bridge piers and abutments, a parking lot, and highway in the immediate vicinity of the bridge site. The Park area may qualify as pristine, but the bridge site does not.

I apologize for being so long winded on my input, but this project is "near and dear" to me personally. I just don't want to see it derailed by a small number of people who mean well, but don't have to live with the outcome.

Thank you for your consideration of my input.

Dear Secretary Kurtz and Staff at DNR. Thank you for the opportunity to provide written comment on this proposed project that will impact the Youghiogheny Scenic and Wild River Corridor. As a 31 year resident and 15 year business owner in very close proximity to this bridge location, and frequent user of the bridge, I was able to attend the public meeting on July 10, 2023, along with many of my immediate neighbors and fellow Garrett County residents. We are the ones who live here, use the bridge daily, whose lives are routinely affected by the current bridge and will be routinely affected by any future bridge design. The almost unanimous testimony given at the public meeting was opposition to the proposed bridge designs and that they are significantly overengineered for the location. This included testimony from a local County Commissioner. Not only are we, the daily users of this bridge, saying the design is too much, we also said, and I repeat here, that we treasure the Youghiogheny Corridor as I know those of you who are charged to protect it do as well. We recognize and value the uniqueness of this resource. As the Agency, by your mission, laws and regulation, charged with its long term stewardship, we asked you, testimony after testimony, to please hear us and use your role in this process to protect this area by reducing the allowable impact to the natural resources even more than currently proposed. Do the right thing by saying no to this exception application as proposed.

I could not find in the online documents where the staging areas for the construction materials, equipment, etc will be if a one lane bridge remains open during the construction of the replacement bridge. Hopefully no additional resources impacted for this.

I was pleased to see it recognized in the evaluations of the project designs that the benefit of maintaining undisturbed forest outweighs the impacts from construction of stormwater management facilities. I was also pleased to see that the size of the existing 14 car parking lot to the east of the current bridge will be maintained and not expanded.

I know all the background conversations and negotiations about this project to this point between DNR, Garrett County Government and other partners were not disclosed at this public meeting. As a former MD Forest Service employee charged with implementing the Forest Conservation Act and, more specifically, the reviewer of the initial Forest Stand Delineation for this bridge replacement, I know this project can be achieved in a different manner. Clearly we have been using a single lane bridge for 12 years now with minimal concerns or issues. We understand the bridge needs replaced. We understand additional width is needed for farm equipment, EMS response vehicles, school buses, etc. There is a narrow construction two lanes bridge at the west town limits of Oakland over the Youghiogheny River

that may be a design option that could address the need for more deck width for these types of vehicles. Or, perhaps, replace with another single lane bridge with safety shoulder to gain additional width. Even another, wider, tressle bridge perhaps? If the driving force of the designs presented is the Federal Highway Administration's funding criteria than this funding source and its criteria must be reevaluated by the County. This is NOT what the community wants or resources need. Please hear us on this. Advocate for us, for the river, for the forest. Show us that DNR is restoring its historic integrity as the agency that makes Stewardship management decisions based on science and the laws it is charged to uphold.

I appreciate that there are many factors to weigh during your consideration of the County's application for an exception. Thank you for this additional opportunity to provide comments on this local project.

Thank you DNR for allowing public input.

Thank you engineers for gathering all the environmental impact information, the R&D on designs and technology to produce bridge models.

The bridge proposals that were engineered seem fit for a highway, but do not fit the character or needs of the Swallow Falls bridge crossing. It's my understanding that the excessive bridge design is necessary for the Federal grant that was applied for to build this section of bridge. Perhaps we can either look for environmental exceptions within the federal codes to build this bridge smaller, or apply for grants in the state instead of being tied to federal bureaucracy.

I appreciate you all bringing in the public to discuss your team's designs, but I sincerely hope you take the public's requests into consideration. Taking lead from the Local Yough River Advisory Board is extremely important. I am grateful Tichnell brought this need forward.

There was a farmer who used the bridge quite a lot, 65 times a day he said, but only during a particular period when harvesting... so perhaps we build when it's not during his busiest season.

Only one bus route is disrupted and much of the emergency vehicles are already detouring around this bridge because it's too small. Using a detour while the bridge is being constructed will cause a lot less destruction.

Please, no sidewalk or bike lanes.

The sidewalk will encourage people to sneak into the park and cause more erosion.

There are no bike lanes on either side of the road, so it doesn't make sense to have them on the bridge.

Please keep the design simple, small, but big enough for emergency vehicles.

To Whom it May Concern,

Thank you very much for the opportunity to comment on the proposed replacement of the bridge located on Swallow Falls Road and within the Wild Section of the Youghiogheny Scenic & Wild River and Swallow Falls State Park.

On July 10, GPI presented the bridge project and listed the following goals for the project:

- To provide a safe, durable crossing.
- To design a context sensitive bridge.
- To minimize disruptions to mobility.
- To avoid or minimize impacts to natural resources.
- To provide safe access for pedestrians and cyclists.

I respectfully submit the following recommendations, in response to these project goals:

- **Preferred Alternative - Option 1C - Reconstruct bridge on existing alignment using traditional construction.** Option 1C results in the least environmental impact to forest resources. In order to meet Section 4(f) requirements, the project must demonstrate that all feasible alternatives were considered in order to avoid adverse impacts to the public land features for which the land was protected. This Option was also the Preferred Alternative in the 2018 GPI conceptual analysis study.
- **Reduce the natural resource impacts in Option 1C by eliminating the sidewalk and reducing the width of the road and bridge shoulder.** The sidewalk is especially problematic given its purpose to attract additional visitation to the site, which is supported by a limited, gravel parking lot designed for fisherman access. The sidewalk will also exacerbate the efforts of the State Park to discourage pedestrians from illegally entering the park by walking across the bridge and impacting the old growth forest. The elimination of the sidewalk and reduction of the road shoulder width will better achieve a "context sensitive bridge" design for the rural area, reduce forest resource impacts and encourage slower speeds.

I recognize from listening to the July 10 testimony by Mr. Sines that the closure of the road for three months under Option 1C will impact his dairy farm operation. In order to make a decision regarding the road closure and increased forest resource impacts, it is important to better understand the scale of the impact of using detour routes to the dairy farm on Swallow Falls Road. Given the natural resource impacts of any option that would keep the bridge open during the construction period, including the least impactful Option 1, it is essential to pursue a fuller understanding from Mr. Sines regarding the impacts on the dairy farm operation in detail.

According to the Scenic and Wild Rivers Application, there are several additional key issues that should also be part of the public involvement process and project record, including:

- How will the permanent taking of any State land be replaced? Will the Board of Public Works need to review and approve a taking? Will replacement land be of equal ecological value?
- How will the U.S. Fish and Wildlife Service listing of the northern long-eared bat as endangered on the Endangered Species List ultimately impact the project?

If a result of the public comments and other additional factors alter the design of the bridge, the public should be given an additional opportunity to review and comment on a new proposed bridge design before it is submitted for federal review. The scale of public interest in this project should necessitate more than a single public meeting and comment period. Rather, the community and all Marylanders who are the owners of these public resources should be given an opportunity to continue to participate in the design and development process.

Thank you, again, for the opportunity to provide comments on this important project. The Department's decisions regarding this bridge will have a generational impact on the Old Growth Forest resources and the State Park, which welcomes 250,000 visitors annually to this unique and beloved natural area. It is difficult to overstate the ecological impact to this rare Old Growth Forest, which will extend to the adjacent forest in addition to the forest acreage directly cleared during the project.

The emotional impact on local residents and State Park visitors will also be severe and life-changing for many if the project is not reduced in size and scope. The Department's stewardship legacy and care-taking responsibility for these public lands, which represent the birthplace of conservation and forestry in Maryland, are at stake.

Commissioners,

For what it's worth, yesterday [redacted] and I took a drive throughout the Shawnee State Park region in nearby Bedford County, PA. It's a beautiful agricultural area with mostly narrow 2 lane roads, a few covered bridges, and numerous small 2 lane small bridges and a few 1 lane bridges.

The more we drove around, the more I thought about the possibility of keeping the existing footprint of a 1 lane 18-20' (for farm equipment) bridge. Whatever happened to the consideration of a "quaint" wilderness bridge that blends into the natural environment? The problem, at least to me, is keeping the bridge open for farmers, emergency vehicles, and residents while undergoing construction, minimizing bridge closure.

I don't know much about construction, but wonder if a huge crane could drop a functional, scaled down (pre-fab?), yet adequate bridge in place with little destruction of the landscape and Wild River protected area offering minimal down time. For example, consider the steel bridge right before you arrive at Penn Alps coming from Grantsville.

This Swallow Falls bridge calls for a special craftsman-like structure compatible with the area, and representative of the values and culture of the Swallow Falls community including farmers, property owners, and storekeepers. This is an historic , ecological gem surrounded by old growth forest and Maryland's only protected Wild River.

Let's not overlook the mission statement of DNR is that the protection, preservation and restoration of our natural resources is fundamental to any bridge replacement.

So, do we need the Feds to pay for it, or can special exceptions be granted for funding small bridges in a forested rural area doing the least amount of damage?

Or is there a resource where we can do this with state and local dollars?

This is too important to rush through.

Unfortunately I was unable to attend the public hearing, but as the [redacted]

[redacted] I must echo the concerns expressed by John. As Maryland's only Wild and Scenic River with only several bridge crossings, any future design must reflect the natural setting, minimize any potential impacts and consider the concerns of the local citizens. It sounds like the public hearing was a good first step, but given the longevity of any future crossing, more work needs to be done. If I can be of any assistance, please feel free to contact me.

[redacted] I am not aware of a provision in them that allows DNR to grant an exception to disturb neighboring state lands in this case.

The exception provision in the river regulations would IMO apply only to the existing county ROW and not to additional state land that they are seeking to impact for the project. <https://dsd.maryland.gov/regulations/Pages/08.15.03.03.aspx>

" (1) The exception is consistent with the legislative intent of the Scenic and Wild Rivers Act and is not injurious to the scenic and wild character of the river; and

(2) Special circumstances as fully described by the applicant affect the land or its structure so that strict application of these regulations, in the case of the applicant only, would cause unnecessary hardship or deprive him of all reasonable use of his property. "

Certainly DNR should explain the legal and regulatory foundation for granting an exception to the regulations.