



SIERRA CLUB

MARYLAND CHAPTER

Sierra Club Maryland Chapter

P.O. Box 278

Riverdale, MD 20738

(301) 277-7111

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Transmitted by email to josh.kurtz@maryland.gov, commissioners@garrettcountymd.gov, swallowfalls@garrettcountymd.gov

Josh Kurtz, Secretary
Maryland Department of Natural Resources
580 Taylor Avenue
Annapolis, MD 21401

Garrett County Board of Commissioners
Garrett County Government
203 South Fourth Street
Oakland, MD 21550

RE: Bridge Replacement over the Youghiogheny River at Swallow Falls State Park

Dear Secretary Kurtz and Garrett County Board of Commissioners,

Thank you for this opportunity to comment on the plans for a bridge replacement over the Youghiogheny River at Swallow Falls State Park. Many members of the Sierra Club Maryland Chapter visit this beautiful scenic corridor in Garrett County and pause in awe when faced with the magnificent old-growth grove composed of hundreds of centennial hemlocks and pines, some over 360 years old. This unique and irreplaceable forest grove along the wild and scenic river is defined by the DNR itself as “the rarest of rare forests.” As will be explained more below, we ask that the DNR and the Garrett County Board of Commissioners choose Alternative 1C, which limits disturbance and lessens harm to this valuable resource and tourist attraction compared to the other alternatives. We also ask that an environmental impact analysis be completed, including a mitigation plan to minimize negative impacts to residents, businesses, and the park and river ecosystems.

The Youghiogheny River is the only protected Wild and Scenic River in Maryland. Located in western Garrett County, the river drains an area comprising approximately 397 square miles in Maryland. Any type of construction will unfortunately impact the riverbed, riverbanks, aquatic life, and benthic organisms and profoundly disturb the surrounding biota. We ask that the DNR do its utmost to shield the river and its surrounding ecosystems from emissions, noise and light pollution, and to avoid increased sedimentation. We also ask that care be taken to avoid compacting the soil and that shaded areas remain protected and closed off to minimize invasive species propagation. Soil is the foundation of this

healthy ecosystem, preventing erosion, retaining vital moisture, and protecting the complex network of microbes and fungi that have developed over the centuries.

Maryland only has 12 small pockets of old-growth forests remaining, the Youghiogheny River Grove being one of the most iconic as it hosts the oldest hemlocks in the state. These ancient trees are the most resilient in the face of climate change. While all forest stages are important, old-growth is exceedingly rare yet offers a unique structure, many canopy layers, and habitat for an abundance of wildlife, including Rare, Threatened, and Endangered (RTE) species. In this particular grove, the rich wildlife includes 147 species of birds (according to e-bird); bats (probably including the critically endangered Northern Long-eared Bat), and Forest Interior Dwelling Species (FIDS) including salamanders, frogs, and bears. Undisturbed old-growth forests also teem with insects, fungi, reptiles, amphibians, lichens, and mosses and all the species sustained by them, making them biodiversity hotspots (Moomaw, et al., 2019). With only five percent of our planet's surface remaining untouched by humans (Kennedy et al, 2019), a pristine area such as the grove needs to be protected from destruction. Over the last fifty years, we have lost over 73% of all monitored wildlife species globally. This means we are only two percentage-points away from a mass extinction due to habitat loss and overexploitation (WWF, 2024). This catastrophic collapse in biodiversity has an oversized impact on ecosystems, pollination, food production, and earth systems processes in general.

For these reasons, the Sierra Club Maryland Chapter believes that an environmental impact analysis is in order, including a nocturnal assessment to determine the presence of endangered and threatened species, and that the results be made public prior to any further approvals or considerations. During this biodiversity collapse, we must protect unique habitats like this old-growth forest grove for biodiversity recovery and ecosystem processes balancing. These ancient trees and mature stands of keystone species can't be replanted or replaced, causing irreparable harm to vital habitat. The DNR has recognized this area as habitat for vulnerable species and must do everything it can to ensure their survival.

It is no surprise that the Youghiogheny River Forest Grove has many layers of protection including:

- Maryland Scenic and Wild Rivers Act
- Maryland's only Wild-designated river
- Youghiogheny Wild River NEA
- Swallow Falls State Park – Youghiogheny Grove Sensitive Management Area
- Irreplaceable Natural Areas Act
- Youghiogheny & Tributaries Irreplaceable Natural Area (INA)
- Lower Deep Creek Complex INA
- Critically Significant for Biodiversity Conservation
- Maryland Targeted Ecological Area (TEA)

- Maryland Old-Growth Forest Act

Federal

- Federal Wild and Scenic Rivers Act
- Federal Endangered Species Act
- Northern Long-Eared and Tri-color bat
- National Historic Preservation Act

The most important may be the designation by the DNR's own Natural Heritage Program as a BioNet Tier 1 Area. This designation means that it contains the state's rarest habitats, ecological communities, and plant or animal species; harbors the largest statewide concentrations of rare, threatened, endangered species; and functions as a crucial building block for long-term climate resiliency. As DNR's guidelines state, "the criteria used within BioNet primarily have a dual focus on both the most irreplaceable species and habitats, as well as on the habitats that concentrate larger numbers of rare species. In addition to focusing on vanishing species and habitats, and on high quality common habitats, the criteria also were designed to incorporate the larger landscapes required for migratory animals, population dispersal, and habitat shifts resulting from climate change."

Unfortunately however, DNR removed the protections on this area by signing a legislative exception to replace the bridge over the Youghiogheny River despite the grove's critical importance.

Sierra Club Maryland Chapter's 70,000 members and supporters consequently urge the DNR to follow the recommendations of its own March 14, 2021, Environmental Review Program Director Anthony Redman's letter: "It appears that a primary focus of the redesign effort should be *to minimize the limits of disturbance and reduce the amount of clearing and grading to the greatest extent possible*. These actions will also facilitate procedural and regulatory compliance by reducing the land area needed to accomplish the project and demonstrating that resource impacts have been minimized to the greatest extent possible" (emphasis added).

We ask that the DNR and the Garrett County Board of Commissioners choose alternative 1C. This option replaces the bridge in its current alignment, limits disturbance to an area of 0.68 acres, and removes around 110 trees from the old growth grove, including four specimen trees estimated to be over 360 years old.

Alternative 1C will have a significant impact on the old-growth grove and, unfortunately, removes important buffering for the remaining trees, but it still remains a better option than 2D.

Alternative 2D, which currently is being considered by the DNR, would build a parallel bridge, offset from its current alignment, disturb over 1.2 acres, and remove over 220 trees including up to 13 irreplaceable specimen trees. The option that minimizes impact and

harm is 1C. We also recommend against widening the bridge or straightening out the road, both of which will encourage faster driving which raises risks for humans and wildlife. A smaller bridge will also have less impact on the viewshed, allowing visitors to better enjoy the scenery.

Within this 257-acre park, only 37-acres are true old-growth. Only 68 specimen trees remain inside the grove (Maryland Department of Agriculture). Option 2D would remove nearly one fifth (13 trees) of the unique assets that people travel from all over to visit. These are the rock stars of the forest. Once cut, these trees will never come back and their loss will permanently harm this important wildlife habitat and erode a valuable ecotourism attraction. The DNR and the county must anticipate public backlash if it does not work to minimize the impact of the bridge replacement, with possible repercussions for the county's economy. Many of the 1.4 million tourists who visit Garrett County every year come to admire the scenery at the Youghiogheny River and Swallow Falls Park and will be deeply disappointed when they encounter a clearcut of parts of the old-growth grove.

Cutting into this grove will not only reduce its footprint but will also compromise the remaining trees. It will permanently damage the ecosystem with irreparable harm to biodiversity and the environment. Choosing alternative 1C will require a 12-mile detour lasting three to five months while the bridge is being rebuilt, affecting a relatively small number of drivers. Sierra Club's Garrett County members are more than willing to add a little bit of time to their commutes to save this unique ecosystem. We are confident most other county residents would agree.

To minimize the inconvenience to farmers and residents of the area, they can be given the opportunity to provide input on the timing for the replacement of the bridge and ample time to plan, for example, for livestock feed. School buses can find an alternate turnaround spot before the bridge. First responders to Swallow Falls currently approach from the south and will not be impacted, thus public safety should not be adversely impacted.

Before initiating any construction on Alternative 1C , in addition to an environmental impact analysis, we request that the DNR conduct a survey of the park's neighbors to determine the most convenient timing for the bridge replacement, develop a plan to support residents and business during construction, and explore strategies to minimize harm to these ecosystems and their biota.

Respectfully,

Sonia Demiray, Member
Biodiversity and Natural Places Committee
Sierra Club Maryland Chapter
sonia@demirayink.com

Josh Tulkin
Chapter Director
Sierra Club Maryland Chapter
josh.tulkin@mdsierra.org

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