



July 21, 2022

The Honorable Tom Wolf
Chair of the Delaware River Basin Commission
Office of the Governor of Pennsylvania
508 Main Capitol Building
Harrisburg, PA 17120

The Honorable Philip D. Murphy
Vice Chairman of the Delaware River Basin
Commission
Office of the Governor
P.O. Box 001
Trenton, NJ 08625

The Honorable John Carney
Member of the Delaware River Basin
Commission
Office of the Governor
Tatnall Building
150 Martin Luther King Jr Blvd South
Dover, DE 19901

The Honorable Kathy Hochul
Member of the Delaware River Basin
Commission
Governor of New York State
NYS State Capitol Building
Albany, NY 12224

Colonel John P. Lloyd
Member of the Delaware River Basin
Commission
North Atlantic Division
302 John Warren Avenue
Brooklyn, NY 11252-6700

Executive Director Steve Tambini
Delaware River Basin Commission
P.O. Box 7360
West Trenton, NJ 08628

Re: National Park Designation for the Delaware Water Gap National Recreation Area

The Delaware Riverkeeper Network does not view securing national park status for the Delaware Water Gap National Recreation Area (DWGNRA) as in keeping with the Special Protection Water Status of the non-tidal Delaware River nor supportive of the diverse communities who currently enjoy our River. We are concerned that the water quality and ecosystem impacts of the development planned should national park status be achieved, compounded by development outside of the park boundaries that will additionally ensue, will compromise the high quality water and natural ecosystems of the River, to a degree not in keeping with SPW protections. Based on the information available, we believe the only prudent course of action is for the Delaware River Basin Commission (DRBC) to oppose advancement of this proposal, or at a minimum to reserve judgment until all of the facts regarding size and scope of associated development, both within and outside the park, are provided.

The DWGNRA is a tremendous natural area for our region that helps contribute to the protection of the Delaware River and its tributary streams' water quality. The ecological health and low level development within and around the DWGNRA has been key to the exceptional water quality and ecosystem health of the

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main stem River and tributaries throughout the region. The National Park Service (NPS) has, for years, worked with the community and conservation professionals to better address in a sustainable way visitor use for this highly prized area that already sees on the order of 4 million visitors annually. National Park status will significantly increase the number of visitors to the park in the near term and the long term – thereby increasing the environmental footprint and creating increasing arguments for additional infrastructure including parking lots, sewage treatment facilities, hotel housing, and other development etc. Unfortunately, we do not see National Park status and the associated plans as in keeping with the Special Protection Waters program, nor the commitment of our region to preserve, protect, and where necessary restore, water quality and ecological health to our River and its tributaries. The additional income that National Park Status may bring to the region will fund the increased infrastructure footprint of the park, along with increased services. The footprint and activities plan, by sheer virtue of their size and scope, will inflict irremediable harm and undermine efforts of NPS to prioritize river protection over visitor experience. And as with other national parks nationwide, the new status will attract massive new development activity outside of the park that will cause a level of local buildout that will inflict additional unacceptable harm over which the NPS has no control.

While there is a current commitment that there will be no fee to enter the park, this does not mean there will be no fees associated with park expansion or use. In order to support the increased park use and promised services and programming that come with National Park Status, new and increased fees of some kind are to be expected. We can expect there will be fees for parking and special area activities as already exists for places like Milford Beach. There is no guarantee that the promise of no entry fee will endure over the years as increasing park use will require an increased need for maintenance and staffing to support it. Fees of any kind, will impact the enjoyment by a very diverse user audience of the park and therefore is a high concern.

We are also concerned that while Lenape representatives living in the Midwest have been included in the planning process, the Lenape Nation and tribes of our region, those that have an intimate, personal and enduring relationship with our River and watershed have not. The perspective of the local Lenape tribes and people is essential and must be honored. Failure to include them in planning seems a dramatic oversight of high concern.

The Delaware River Basin Commission must prioritize River and water quality protection, including upholding the Special Protection Waters designation and standards for the nontidal river. At this time, based on what we know, we believe there is no way the DRBC can support National Park Status for the DWGNRA.

Respectfully,



Maya K. van Rossum, the Delaware Riverkeeper



Tracy Carluccio, Deputy Director