

July 25, 2022

Delaware Riverkeeper Network
925 Canal Street, Suite 3701
Bristol, PA. 19007

Dear Ms. Van Rossum and Ms. Carluccio,

On behalf of the Alliance for the Delaware River National Park and Lenape Preserve, I thank you for your long and steadfast dedication to the Delaware River. We are, of course, surprised and dismayed by your recent correspondence. Please allow me to address the concerns you have raised. First, this is a work in progress and a process. Since you self-identified as an interested party and a potential supporter at a very early stage in the process you are viewing only part of the long-term process. Your obvious knowledge and expertise in land and water management and in developing a consensus approach to issues led us to believe your organization would be a perfect partner for our efforts. We still believe that.

Regarding development along the river corridor, we believe the reality is the opposite of what you have described. Currently, the National Recreation Area has an approved visitor Use Management plan (VUM) that does call for new beaches and camping areas along the river. In contrast, our proposal intends the river corridor to be maintained in its present state except for the ecological improvements that will result from the redesignation to a national park and preserve. The national park status will in fact protect the lands and waters within it to the highest level of protection offered by the National Park Service (NPS), I reference the NPS website and both NPS and Congressional Research Service definitions of national park (NP), national recreation area (NRA), and national preserve (Pres).

Allow me to highlight the physical and policy changes that will result from this change. The Delaware Water Gap National Recreation Area (DEWA) has the very unusual authority to manipulate habitat, by such methods as clearing forest to increase edge habitat. This is not academic since it has occurred many times in the past, to enhance hunting experiences. The NP status will remove that authority within the national park boundaries. The new status will also result in a diminished number of acres being maintained in the agricultural program and those acres will become reforested in native woodlands or restored to their original wetland status. The high-quality wetland restoration project taking place currently at the Watergate site in New Jersey is a great example of removing impoundments and reconfiguring the original landscape as it should be found. In either case the native species will be enhanced and restored.

In addition, the no till farming technique being used in DEWA employs a large amount of herbicide to avoid tilling the farm areas. That pesticide use will be reduced accordingly also further protecting the lands and the waters surrounding the leases. This reduction will change the status of DEWA from one of the largest users of pesticides in the national park system. It is noteworthy that almost all the agriculture is adjacent to the river corridor, and that the General Management Plan calls for up to 20% of the lands to be maintained in open space.

We are happy to commit to restrictions on the amount and type of development within the national park corridor in any legislation that is proposed. We invite you to help us craft language to accomplish that goal. The current management strategy is exactly the opposite of your goal with the plans in the VUM already discussed.

I am confident that you are aware of the growing need for this type of nature-based recreation for the 60 million people within a day's drive. Expecting that the visitation will not continue to increase regardless of designation is a poor plan for protecting the environment. Not only will they continue to come and to grow in numbers, but the enabling legislation that created this place did so with these Americans specifically in mind (please see the legislative history and President Johnson's remarks upon signing the law). These are the citizens who have not received outdoor equity as planned by the law creating the NRA. The proper approach is to plan for the appropriate portfolio of sustainable transportation and facilities based on the model projects that have been employed over the last decade such as buses in DEWA and other national parks. DEWA is one of the 8 park units that contain 60% of all the NPS infrastructure, but the other 7 all have budget 2 to 3 times larger. In the past 55 years that infrastructure has continued to decline, and visitors have been deprived of opportunities as a result. Continuing the same path will continue to have the same results. The infrastructure problems and incapacitating budget issues will only improve if they are recognized and advocates demand solutions. Disintegrating roads and other infrastructure are a greater threat to the environment than visitors properly planned for and managed. There is no reason why the national park and preserve cannot be a model of sustainable management. Only continuing the same methods and expecting a different result will make it impossible to improve the environment, the economy and the sustainable management of the resources and the visitors.

Regarding your comments on fees, the existing NRA has had a fee program for decades based on facilities and that very program adds to the number of people using areas without sanitation of any kind. They seek inappropriate areas to recreate because of the present situation. In addition, the NRA just announced the river camping program will be managed by reservation system and include new fees. Just last year as part of the VUM an entrance fee was proposed but not adopted. These actions demonstrate that the NPS can raise fees at any time regardless of designation. It is the NRA that is most likely to engage in the development that you mistakenly assign to national park status. The National Park Status will eliminate the kind of inappropriate development that you fear.

Diverse family groups have been a mainstay of park visitation at DEWA for at least five decades that I am personally aware of and will continue to do so. Those groups are well represented in

all the existing fee areas. You can review the surveys and other reports prepared by the Social Science branch of the NPS over the years and work done by Clemson University more recently in preparation for the VUM. The surveys of canoeists conducted several years ago is very enlightening as well.

It is not clear where you developed the mistaken impression that we are not working toward inclusion of “tribes of our region” in our planning. In addition to contacting the three federally recognized Delaware/Lenape tribal nations, my colleague Jacqueline Wolf Tice and myself broke bread and spent hours discussing this project with Chief Mann of the Turtle clan, Ramapough Lenape Nation, and his wife Mikey. We gained valuable insights and do intend to visit with him again. Chief Mann and I serve together on the Board of Trustees of the New Jersey Highlands Coalition. Ms. Tice has met with Urie Ridgeway and other members of the Nanticoke Lenni Lenape Tribal Nation, and we plan to engage the Powhattan Renape Nation next. Ms. Tice works with the indigenous Law Program at the University of Oklahoma and has 30 years of experience working on Native American issues and engaging tribal communities. We ask you not to dishonor the value of our consultation with nations who have received news of this proposal with open arms because we have not reached everyone yet. Our efforts are limited by the volunteer nature of our organization but will eventually be comprehensive. If you are aware of other entities that we should contact, please provide us with the information and feel free to assist us in consulting.

We received good news from the NPS Director Chuck Sams when we visited him on July 12 in Washington D. C. The Department of interior (DOI) and the NPS are rewriting their guidance for nation-to-nation consultation because of an agency executive order issued jointly by Interior Secretary Haaland and Secretary Vilsack (Department of Agriculture) that allows the United States to consult with state recognized tribes as well as federally recognized tribes on land management, watersheds, and wildlife habitat. This will simplify these efforts for all concerned including federal agencies.

I hope these responses to your concerns allow you to reconsider your decision to support this effort. It is a process, and it will take time to reach everyone who should be included. There is nothing that will protect the outlined national park and preserve more than this designation. While there is a great deal of misinformation being spread intentionally by those who would like to deprive those millions of Americans the opportunity to enjoy DEWA just as they already do, we are confident the truth will find its way to the public and look forward to working hand in glove with you to accomplish this great task for the very people who Congress created this park for and for all Americans. We invite you to meet with us and discuss your concerns at any time.

Sincerely,

John J. Donahue
On behalf of the
Alliance for the Delaware River national Park and Lenape Preserve