



DEWA National Park Steering Committee  
*Via Email*

July 21, 2022

Dear Members of the Committee,

We at the Delaware Riverkeeper Network very much appreciate the dedication each of you, along with your organizations, has to protecting our beautiful Delaware River. And we understand that you are in support of National Park designation for the Delaware Water Gap National Recreation Area (DWGNRA) because you believe it will be good for our river and communities. We at the Delaware Riverkeeper Network have taken to heart all you have said about the values of National Park designation. But after careful consideration, we find that we cannot support securing national park status for the Delaware Water Gap National Recreation Area.

It is our considered opinion 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 the needs and goals of our region or the Special Protection Waters designation that we have worked so hard to secure and uphold for the non-tidal River.

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 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 rationale for additional infrastructure including parking lots, sewage treatment and other utility facilities, hotel housing, and other development. The footprint and activities plan, by sheer virtue of their size and scope, will inflict irremediable harm and undermine any 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.

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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. Fees of any kind, will impact the enjoyment by the very diverse visitor audience of the park that use the National Recreation Area today 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.

At this time, based on what we know, the Delaware Riverkeeper Network cannot support National Park Status for the DWGNRA.

Respectfully,



Maya K. van Rossum  
the Delaware Riverkeeper



Tracy Carluccio  
Deputy Director