



**Submitted through NPS Web Portal**

**10/9/2015**

**Scoping Comment of the Delaware Riverkeeper Network - NPS DWGNRA Visitor Use Management Plan**

Delaware Riverkeeper Network (DRN) welcomes the opportunity to provide comment to the National Park Service (NPS) in regard to its proposed Visitor Use Management Plan for the Delaware Water Gap National Recreation Area (DWGNRA). The DWGNRA is a tremendous natural area for the region that helps contribute to the protection of the Delaware River and its tributary streams' water quality. We thank the NPS for working with the community and conservation professionals to better address in a sustainable way visitor use for this highly prized area that sees more than 5 million visitors annually from across the world and within 2 hour driving distance from New York City and Philadelphia.

The DWGNRA was a contributing factor behind DRN's Delaware River stream redesignation petition that was submitted to Pennsylvania Department of Environmental Protection (PA DEP) in 2011 with a request to upgrade all PA tributaries and the main stem Delaware River to Exceptional Value (EV) status from the vicinity of the Delaware Water Gap north to the New York border. DRN, and the hundreds of organizations and individuals who co-petitioned the PA DEP, believe EV status is an appropriate and deserving designation for these important cold water and already high quality waterways that flow into the DWGNRA, making these tributaries and the main stem Delaware River itself a significant natural resource. The planning and protection NPS has undertaken in the past within the park boundaries and now with this plan and future protection efforts for these tributaries and the region will help illustrate to PA DEP, with the volumes of other submitted information, that it is very much time to give these tributaries and the main stem the state protection they deserve and to be better aligned with the regional and national protections of the River and its tributaries that so many worldwide treasure and enjoy.

Please see below for NPS scoping strategies DRN supports or does not support for further pursuit and in some instances, where DRN would need more information or site specific details to fully assess our perspective on specific strategies. DRN's comments are based on a foundation of decisions that support and sustain the natural qualities, habitats, sensitive floodplains, riparian buffers, and the exceptional water quality of this remote region.

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## **Delaware Riverkeeper Network General Foundation Considerations Related to Visitor Use**

Some key overall concepts and conservation measures related to management strategies that DRN believes should be the foundation for all scoping and suggested NPS management strategies include the following:

In general, no new development of “hard structures” or extensive “softer impacts” that could still cause compaction (due to heavy foot traffic) or forest loss in existing undisturbed 500 year floodplain and riparian corridor of the River or tributary streams. Forests and wide and healthy diverse native (and existing exotic invasive buffers that should be restored) riparian buffers are important to visitors’ experience and to maintaining and improving the water quality of the Delaware River and its tributaries. As such, NPS efforts should be conducted in a way to limit any new disturbance to these sensitive linear areas along the River and tributary streams. For specific strategies, efforts should be made to implement these strategies in existing areas of disturbance (e.g., agricultural lands, already compacted soils with no forests, existing historic structures and farmsteads and existing building foot prints, etc.) while also weaving in restoration and infiltration retrofit practices to these existing areas to restore habitats and native riparian buffers and floodplains. As such these strategies will be ultimate improvements to the habitat in the DWGNRA while also providing new opportunities for visitors.

With this scoping work, DRN suggests a possible water quality study or carrying capacity study, perhaps in coordination with DRBC, to determine the carrying capacity of visitors for the river as it relates for example, to water quality and habitat on a daily basis. For example, for popular high use places like Milford beach or Smithfield beach that are often packed on hot days in the summer, the existing parking helps maintain a certain carrying capacity of people and swimmers at those busy locations. If we consider all the paddlers and boaters also on the river on those hot days, (including paddlers and boaters renting from livery services using the park) - a carrying capacity analysis may be a way to quantify use for the river to ensure water quality protection. Trail carrying capacity may also be part of this study in order to put a daily cap on visitors to specific trails, especially popular trails in the DWGNRA – to preserve the experience of visitors and protect wildlife needs and resources in those high use areas. It has been discussed in prior round table meetings, for example that fecal coliform could be one of the possible indicators to examine for such a river carrying capacity study and examples of similar studies have been conducted in other areas and for other rivers<sup>i</sup>. More research has been done in recent years related to fragrances, sunscreens and other manmade healthcare products entering water bodies that impact aquatic life and this too could be examined as part of a carrying capacity study. Motor boat traffic is another big concern in the Delaware Water Gap that needs to be considered for carrying capacity and that if increased, can lead to additional hydrocarbon pollution inputs to the River and air pollution while also causing noise, safety concerns, wildlife disturbance, and detract from the human enjoyment for non-motorized hikers, paddlers, and bikers in the DWGNRA<sup>ii</sup>.

## **Specific DRN Input on Volunteer Management and Use Strategies**

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DRN has used the NPS framework to provide comment on specific proposed management strategies.

## **Camping**

DRN supports NPS development of new primitive or low impact tent camping and some walk in and bike in only expansions especially if done in areas that are already disturbed or compacted where no forest clearing will be needed. For example, perhaps setting up new camping areas in agricultural lands and planting fast growing native trees in agricultural lands to begin converting these locations to shady areas for campers would be a good option to pursue to help increase forested buffers.

DRN does not support the development of new RV camping and believes that RV parks are located outside of the park for families who want to RV camp nearby. Limited car camping could potentially be added in already impacted areas again where forests or native vegetated buffers and floodplains are not disturbed. Establishing short walk in sites with wheel barrows for gear and designated existing parking areas for car campers could be a way to increase car camping without increasing the roads and compaction that comes with campsites where cars can drive up to their campsite. Walk in sites are also highly prized by many car campers currently at Dingmans Ferry Campground.

Additional walk in or bike in campsites along trails where there is not sensitive habitat is a good idea and could be a way to increase camping without bringing along increased compaction. However foot traffic itself can cause compaction and spread of invasive species so a permitting system could be implemented to ensure over use does not lead to environmental degradation and severe compaction of soils.

Another option to limit the creation of new camping areas could be to better utilize a river corridor wide camping system that could funnel car campers or tent campers to existing unused group sites that may not be occupied by groups. So for example all options of camping could be made available to campers to reserve sites in advance (similar to the NJ or PA DCNR camper reservation system) – always being sure to reserve some sites for same day campers who arrive on the spot to minimize illegal camping.

DRN would support cabin rentals in existing historic houses where footprints of compaction would remain the same and no new access roads and expansions of roads would be necessary. If that is too limiting, there are places like Babbling Brook Cottages nearby and just outside the DWGNRA that could be recommended for families who want to visit the park<sup>iii</sup>.

An important aspect for camping that is needed is that more should be done to educate campers and concessionaires on proper camping etiquette. Dingman's Ferry campground, for example, has made some improvements in 2015 with a list of rules highlighted at camp check in but frankly people are not going to read the fine print. Bears need to be better protected by a stronger camping etiquette policy and a better job needs to be done to ensure campers are not attracting bears with their coolers and garbage left out at campsites quite routinely – day and night. If concession staff had more training in this matter they could, in turn better educate campers since they are often the main interface with campers at check in. A good suggestion to add to camping areas and picnic areas may be what places

like neighboring Stokes Forest in NJ has in place where a bright yellow plastic placard is secured on each picnic table that denotes bear country and points of what to do to keep the bears and the campers safe. In this way its eye catching and at each campsite and not missed in the fine print rules and regulations that may not be read during check ins. Picnickers would also benefit from this bench signage.

In existing campgrounds like Dingman's Ferry, campsites in the forest already seem to be at maximum capacity and spaced as closely as possible. If additional campsites were added in those areas or along the river, we feel the qualities of the experience would be lost for campers and too much disturbance to the natural environment would ensue. It's important to have a healthy native wooded shrub and tree buffer maintained between these camping locations for wildlife and for seclusion. It's also important that routine monitoring, maintenance, and native plantings are conducted in these areas to control the spread of invasive plants that could continue to degrade the diversity of the campsites and other heavily trafficked areas while also spreading invasive seed to hiking areas campers then frequent. More education on these items should be established for campers. Bug zappers should also be removed from the bathrooms of the campsites. These bug killers science has shown, are ineffective at killing mosquitoes and instead kill beneficial insects and pollinators and having them in the campground is not in alignment with NPS goals.

### **River Camping**

DRN would support a permit and fee system for existing primitive river campsites in order to better manage those existing sites and to minimize illegal camping. If additional paddle in sites are pursued, those sites should be limited to areas already disturbed in order to not impact the riparian corridor or existing forest. For example campsites could be tucked in at existing agricultural lands that are conventionally farmed and those areas could be planted with native fast growing trees to establish forested primitive sites over time. Already some agricultural lands have illegal camping on them due to proximity of the ag land to the River. Efforts to increase riparian buffers in these existing farmed areas and peppering camping in those agricultural areas could help improve water quality and camping while limiting the amount of conventional farming that is done in the park.

To minimize harm, DRN would support NPS efforts to require pack in and pack out of garbage and human waste. This practice also helps encourage campers to tread lightly in riparian areas. The presence of a remote (low maintenance) small compost pit toilet like that seen in back country areas of the nation could be supported as long as access roads would not have to be built to access those pit toilets for maintenance and those compost toilets were located far out of the floodplain.

Related to farming in the park, efforts should be made to ensure organic practices are required in those areas rather intensive conventional agriculture that appears to currently be GMO based and highly sprayed with herbicides and pesticides. For example, hay fields would be less impact on the DWGNRA, contribute to grassland bird species possibly having the option to nest (if farming practices were

implemented and timed that allowed for songbird nesting) then the planting of corn, soybeans or other GMP crops.

### **Trails and Trail Use**

DRN would support a permit system for some popular trails to reduce crowding and impacts to the resource and visitor experience. DRN would also support the closure of some trails or the reroute of trails to protect the creeks and other resources and in order to preserve sensitive habitats. DRN also supports increased staffing to better manage and patrol trails to better educate visitors.

If hardened trails like boardwalks, could help better protect a sensitive resource from compaction and foot traffic, DRN would support that practice on a case by case basis. Creating new view sheds should be limited or not pursued if it means cutting of mature trees for a view on steep slopes. If view sheds could be established on already impacted and cleared areas like existing ROWs, then that would be something DRN would support since the area is already highly impacted.

Developing a loop trail is an interesting concept DRN would support as long as it is a foot trail and utilizes as much as possible existing trails, like the MacDade trail, to limit new trails and foot traffic and the invasive species and soil compaction and stormwater runoff foot traffic can bring. Existing scars on the land like electrical ROWs and pipeline ROWs should also be considered for these new trails and view sheds since they are already cleared and harmed areas. With existing ROWs the operator should be required to enhance the ROW with additional native plantings, meadow plantings and woody shrub plantings where feasible to improve visitor experience where these linear impacts were allowed in the first place. Hand control of invasives should also be required versus spraying of pesticides to control invasives along these ROW corridors. No new ROWs should be allowed in the park as they affect visitor enjoyment, fragment sensitive areas, cause severe erosion, increase stormwater runoff and are a permanent scar on the landscape.

### **River Access Points**

DRN does not support the addition of a boat ramp for motorized boats on the NJ shoreline. Motorized boats already are heavily used on the southern portion of the DWGNRA at Kittatiny, Worthington, and Poxono and there are plenty of access points on the western side of the Gap in Pennsylvania.

DRN would support a small canoe only/non-motorized access or dock on the New Jersey side north of Poxono if it was placed along an existing impacted area along Old Mine Road and no new roads would have to be cut to access that non-motorized boat dock or launch. The character and remote nature of Old Mine Road is charming and efforts need to be made to keep that remote while on the Pennsylvania side there is already more access and canoe access for park visitors.

DRN does not support the expansion of parking at some launch sites to accommodate additional use and overnight use due to the development this would cause to the floodplain and the existing riparian

areas that are important to river water quality. The existing often large parking areas themselves help establish the carrying capacity of that particular launch area while protecting a visitors experience by limiting crowding. To protect overnight campers and paddlers, NPS could, as is suggested, provide overnight parking for AT users and overnight paddlers through permit and through designating some existing parking areas as “only for overnight guests – no day users”. In that way those coming to enjoy the resource for several days are not outcompeted by day users. At locations where NPS staff man a gate, if the lot is full, they can educate travelers to other locations where they may be able to access the River or a kiosk could be provided to show those access points if a manned station is not present.

DRN also supports better control or NPS rules of liveries that are utilizing these river launch areas. It has been monitored by DRN staff and members that liveries often monopolize the put in locations by parking and idling their vans and trailers along the river edge as they wait for a large group of paddlers to arrive at the take out. This practice makes it difficult for others with their own private canoes to easily access and load and unload and also detracts from visitors present at the location while also increasing air pollution that deposits in the nearby River. No idling signs may be a way to limit air pollution from cars during loading and unloading while also educating the public to air pollution but liveries staff should certainly use BMPs and proper etiquette while frequenting these locations if they are continued to be allowed to use these facilities. Paddling liveries can do a lot to educate the thousands of people they bring to the region every year and they are a good partnership to have so more people enjoy and learn about the Delaware River.

DRN does not necessarily support enhancing picnicking opportunities near river access sites with the exception of ensuring there are bear proof recycling and garbage outlets at more established areas and clear signage for carry in and carry out at more remote locations – bilingual signs would be key as well. These river access sites are already crowded and by adding additional picnic tables or grills– it would only increase garbage and more crowding to areas that are already crowded. For any picnic areas, as indicated above, better bear signage on picnic tables should be displayed to better educate the public and protect the native black bear population. Black bear populations may be another reason to limit establishing more established picnicking opportunities. Along those same lines, currently at some day use areas there are garbage cans that are not bear proof and often overflowing after busy weekends. It would be wise to turn all garbage receptacles into bear proof options that also include recycling options (as is present in some of the locations) or require carry in carry out.

### **Day Use, Picnic and Recreation Sites**

DRN does not support in general, the expansion of group day use sites. These sites are already very busy when at full capacity and adding new hard structures in the floodplain and riparian buffers should be avoided. Large groups and camps could plan in advance to be able to access these areas in a staggered way to avoid overcrowded conditions.

DRN strongly supports closing sites (temporary or permanent) where sensitive resources and habitat restoration and protection is needed. Preserving these areas is a critical component for the quality and preservation of the River corridor.

As indicated above, DRN does support reserved and designated (permit) overnight parking for Appalachian trail and river users who are backcountry paddling.

DRN does not have enough information to support formalizing (hardening/developing) unofficial sites currently used by visitors – this should be decided case by case and the habitat and existing infrastructure present needs to be considered to limit new impacts. For example, there is an area north of 1-80 on the NJ side near the old Tammany Hotel that may be a location to consider this idea based on the numbers of people who appear to use this area unofficially for swimming/sun bathing along a bedrock area of the River. For this site, we envision there may already be a road in place to get folks close to the River so a new road would not have to be cut – meaning existing impacts may already be present that could be used to help formalize such a location. Perhaps an area like this there could be a seasonal stairwell added for safety reasons to make this area more accessible to the public that is already using it. Again, the cutting of trees and impacting intact forested area and the riparian corridor should be avoided but if there is old infrastructure present and old homesteads, utilizing those locations, on a case by case basis, this kind of development of an unofficial site may be appropriate. With these locations the carrying capacity of the River should also be considered since each swimmer does have a certain amount of fecal matter, sunscreen, fragrances and other pollution that comes along with them. According to Dr. Charles Gerba, a professor of microbiology and environmental studies at the University of Arizona and Chief of Healthy Swimming for the Centers for Disease Control and Prevention, "The average bather has about a tenth of a gram of feces in his gluteal fold," Gerba says. "That means with five people, you have a tablespoon of fecal matter." <sup>iv</sup>

### **Operational Strategies**

DRN is in support of increasing the number of fee sites throughout the park to improve services especially at existing locations that have existing facilities and higher maintenance costs and infrastructure. DRN also supports increased fees to increase needed NPS presence throughout the park and would also suggest establishing volunteer corps like the National Canoe Safety Patrol to assist in this effort of increased education, safety and patrolling on the River and trails. An entrance fee could be a potential concept since most national parks have a similar entrance fee structure – this might also help limit automobiles using the park road as a commuting road. If an entrance fee was established a week long pass or similar structure that would cover a family that was visiting for a week at multiple locations and facilities would be appropriate – in this case the week long pass would be good for as many visits and areas of the park. We believe the park already offers year long passes for visitors who frequent areas so that should also be an option for people who recreate regularly.

DRN does not support the addition of concession type (food) services at beaches and other designations. Food concessions bring with it crowds, more maintenance and more garbage and would detract from the remote character and simple picnic options that are currently in the DWGNRA. When people want to go to a restaurant or quick stop deli they can simply leave the park and frequent a nearby establishment. This brings revenue to the local economy while make the park a respite as it was intended to be.

DRN would support using existing historic structures, like for example, the Turner Store, to highlight the history of the region and add to educational opportunities or small meeting areas for local groups and the community.

### **Interpretation, Education and Recreation Opportunities**

DRN does not support the building of a new visitor center or multi use center to accommodate larger groups and provide a space for visitor education and information. It would appear that places like the Bushkill Meeting Center, Kittatiny Point Visitors Center, and Dingmans Falls Visitor Center and others can provide and fulfill this need. The past several years some of these centers have been vacant or closed and reopening them all would be a great way to assist more visitors.

DRN does support adaptively re-purposing some of the historic structures for visitor use and simple education services or meeting areas (not food concessions) and to avoid increased building footprints in the park with new structures.

DRN does support increased and simple signage for visitor education. Again, the placards on picnic tables for picnic and camping etiquette in bear country is also needed.

DRN supports an established fee for complex interpretation programs and increased staff presence and formal education programs. There is a definite need to educate visitors of the park and these programs could go a long to preserving the area for many generations to come. In this way families can go from being simple swimmers of the park to being stewards of the park with increased knowledge of the region and the impact humans have on it. It would be important that educational programs are available in multi languages since diverse populations come to enjoy the park. Perhaps a volunteer core could also be used to help increase this presence as well.

### **Expanded and Changed Recreational Opportunities**

DRN supports designating appropriate creek swimming locations (in areas where use would not have great impact on resource) and disallowing swimming at some creeks for resource and habitat protection. If creek swimming is designated, the carrying capacity and how many people can visit at one time should be considered. For example, trampling of the streambed will impact benthic communities so access needs to be limited and controlled. More should also be done in swimming areas to encourage people to use less fragrances or swimming lotions that could be harmful to aquatic

life. In high use and easily accessible areas, DRN would support NPS disallowing swimming at all waterfalls/creeks for public safety that are frequently visited. At the same time though, if back country campers want to take a dip in a creek in more remote locations where there are limited people, there should be no restrictions to that practice.

DRN is not inclined to support the posting of lifeguards at more remote and less developed sites like Crater Lake, which we believe would threaten the wilderness character by attracting larger groups and more visitors.

DRN is not inclined to support additional mountain biking and equestrian trails beyond what is already allowed due to the impacts these activities can cause.

Delaware Riverkeeper Network appreciates the work that the NPS is doing to maintain the beauty, remoteness and natural diversity of DWGNRA while balancing, managing, and educating the millions of people who flock here for these same reasons. We look forward to learning more and continuing to be involved in the decision making process for the park.

Sincerely,



Maya K. van Rossum  
the Delaware Riverkeeper



Faith Zerbe  
Monitoring Director  
Delaware Riverkeeper Network

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<sup>1</sup> **Recreational use and carrying capacity for the Klamath River.** Shelby, Bo, 1948-; Stein, Kristen; Oregon State University. College of Forestry; Oregon State University. Water Resources Research Institute. <http://ir.library.oregonstate.edu/xmlui/handle/1957/558>)

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ii **Estimating the recreational carrying capacity of a lowland river section.** [Water Sci Technol.](#) 2012;66(9):2033-9.  
doi: 10.2166/wst.2012.418. [Lorenz S<sup>1</sup>](#), [Pusch MT.](#) <http://www.ncbi.nlm.nih.gov/pubmed/22925880>

iii Babbling Brook Cottages, Silver Lake Road, Dingmans Ferry, PA. <http://www.babblingbrookcottages.net/>

iv This will make you never want to get into a hot tub again. Huffington Post. 2014.  
[http://www.huffingtonpost.com/2014/05/19/hot-tub-germs\\_n\\_5268919.html](http://www.huffingtonpost.com/2014/05/19/hot-tub-germs_n_5268919.html)