



c/o Delaware River Greenway Partnership, PO Box 15, Stockton, NJ 08559

[www.lowerdelawarewildandscenic.org](http://www.lowerdelawarewildandscenic.org)

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February 24, 2021

Dennis H. Carney  
Township Manager  
Solebury Township  
2092 Sugan Road  
Solebury, PA 18963

Dear Mr. Carney,

RE: Carversville Inn Land Company Proposal

We are pleased to have Solebury Township as a municipal member of the Lower Delaware Wild and Scenic River Management Council ([www.lowerdelawarewildandscenicriver.org](http://www.lowerdelawarewildandscenicriver.org)). As you know, the National Wild and Scenic Rivers System was created by Congress in 1968 (Public Law 90-542;16 U.S.C. 1271 et seq.) to preserve certain rivers with outstanding natural, cultural, and recreational values in a free-flowing condition for the enjoyment of present and future generations. The Lower Delaware River, and three main tributaries to the River – the Tinicum, Tohickon and Paunacussing – were added to the Act in 2000.

The Management Council follows issues that could impact River resources. As such, the Carversville Inn Land Company application before your Zoning Board was brought to our attention since it sits along a named tributary, the Paunacussing Creek. We are interested in working with Solebury Township on this application to ensure the best possible project outcomes along the River. Our primary concern is that water quality be carefully considered. More specifically, we suggest the following issues be vetted during the review process:

- The potential for stormwater runoff due to the current or increased percentage of impervious cover, or the impact to stormwater management practices on the property,
- The lack of public sewer and the proposed increase in capacity,
- The location of the proposed expansion in a flood plain,
- The location of the project in a Riparian Corridor Conservation District, and
- The potential for soil erosion due to excavation, construction, tree removal or regrading.

In addition, we recommend final project approvals be granted only after the applicant has met all local, state, and federal permitting obligations including any permits mandated by environmental agencies, soil and riparian conservation districts, and the Army Corps of Engineers. I am sure you are already aware, any project in close proximity to a named tributary involving a federal permit or funding will be reviewed by the National Park Service (NPS) under Sections 7 and 10(a) of the Wild and Scenic Rivers Act.

There are two documents that would be of interest to your professionals and review boards. First, the Lower Delaware Wild and Scenic Management Plan is the document agreed to by all municipal and agency parties at the time the River was designated as a National Wild and Scenic River; the Plan lists six primary goals for conserving the River, including water quality, open space preservation, and protection of natural resources. The full plan can be found at: <https://lowerdelawarewildandscenic.org/index.php/resources/documents/lower-delaware-wild-and-scenic-management-plan>. See page 24 of the Plan:

*Water Quality: Maintain existing water quality in the Delaware River and its tributaries from measurably degrading and improve it where practical. Policies: (1) Achieve the highest practical state and federal water quality designation for the river and its tributaries. (2) Manage point discharge and storm water non-point runoff to minimize degradation of the river. (3) Encourage the use of Best Management Practices in the areas within the river corridor to minimize water quality degradation from storm water runoff. (4) Encourage the use of Best Management Practices for activities other than agricultural that could result in water quality degradation from storm water runoff. (5) Discourage inappropriate development in floodplain, wetlands, steep slopes and buffer strips along the Lower Delaware River and its tributaries.*

Second, our Stewardship Handbook can be found at <https://lowerdelawarewildandscenic.org/index.php/resources/documents/guides/stewardship-handbook/>. Pages 10-15 of the Handbook also includes commentary about storm water management and water quality.

Feel free to contact Maryann Carroll, Executive Director of the Delaware River Greenway Partnership, who serves as the administrator of the Lower Delaware Wild and Scenic Management Council, with any questions. She can be reached at [maryann@delawarerivergp.org](mailto:maryann@delawarerivergp.org). Please provide notice to her when a final Carversville Inn Land Company site plan is submitted to the Township Planning Board.

Thank you for your consideration.

Sincerely,  
*Richard Dodds*  
Chairman

cc: Zack Zubris, Zoning Officer, Solebury Township  
Nicole Slack, Zoning Administrator, Solebury Township  
Jean Weiss, Land Preservation/Planning Commission Administrator, Solebury Township  
Maryann Carroll, Executive Director, Delaware River Greenway Partnership  
Sarah Bursky, Community Planner/Liaison to the Lower Delaware Wild & Scenic River, NPS