



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

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

[info@lowerdelawarewildandscenic.org](mailto:info@lowerdelawarewildandscenic.org)

[www.facebook.com/lowerdelawarewildandscenic.org](https://www.facebook.com/lowerdelawarewildandscenic.org)

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August 20, 2021

Ms. Kimberly Cenno, Bureau Chief  
Bureau of Environmental Analysis, Restoration and Standards  
Division of Water Monitoring and Standards  
401 E. State Street  
PO Box 401  
Trenton, NJ 08625

Dear Ms. Cenno,

*RE: 2018/2020 Integrated Report*

The Lower Delaware Wild and Scenic River Management Council submits these comments in response to the draft 2018/2020 Integrated Report and the potential implications of the report to the Lower Delaware River system.

#### **Wild and Scenic Rivers Background**

The Lower Delaware is the National Wild and Scenic River System segment, established by Congress on November 1, 2000, as Public Law 106-418, includes 65.6 miles of River segments which form the Pennsylvania and New Jersey border, plus named tributaries. The National Park Service (NPS) is responsible for the long-term protection of the River and administers the Wild and Scenic Rivers Act.

NPS works closely with the Wild and Scenic Management Council, created through the designation as an advisory and coordinating body. The Council is comprised of representatives from local, state, and federal governments, as well as environmental nonprofits. The Lower Delaware River Management [Plan](#) (August 1997) was developed as a part of the Wild and Scenic River Study, approved by all State and local parties, and referenced by Congress as the Plan by which the Wild and Scenic River would be managed. It identifies ecological resources and water quality as key attributes of the River that must be “protected and enhanced.”

#### **Lower Delaware Geography**

It is important to note that how the NJDEP identifies the “Lower Delaware” is different from the geography of Lower Delaware Wild & Scenic corridor. Our “Lower Delaware,” includes River segments from Easton, PA to just north of Trenton, NJ, as we are a bistate group. It spans from river mile 193.8 to

the northern border of the City of Easton, from south of the Gilbert Generating Stations to north of the point Pleasant Pumping Station, from South of the Point Pleasant Pumping Station to 1,000 feet north of the Route 202 Bridge, and from 1,750 feet south of the Route 202 bridge to Washington Crossing. Additionally, some Pennsylvania tributaries are designated including Tinicum Creek, (headwaters of two upper branches to the Delaware River confluence), Tohickon Creek, (downstream of Lake Nockamixon to the Delaware River confluence), and Paunacussing Creek, (portions passing through Solebury Township to the Delaware River). The Musconetcong River, (3.5 mile stretch from Saxton Falls to Route 46 and the 20.7 mile stretch from King's Highway Bridget to railroad tunnels at Musconetcong Gorge), was designated in 2006.

### Issues of Concern

Our intent is not to comment on the full report as we concur with the technical comments submitted by the Musconetcong Watershed Association and The River Network. Rather, we would like to bring to your attention two specific issues important to our Wild and Scenic partners.

- **Beyond the River Itself** - The report does not take into consideration the many tributaries that feed into the Delaware River. Our Management Plan names several tributaries, and as such, protections extend to these bodies of water. Would the NJDEP consider including New Jersey Delaware River tributaries (especially any C1 streams) in your data collection and analysis in the future? We believe maintaining the strictest water quality designations for all Delaware River tributaries is important to the long-term health of the River.
- **Water Testing in Warren and Hunterdon Counties** - There is a fair amount of antidotal evidence shared by local residents along the River in Warren and Hunterdon Counties and in Bucks County, PA, that during the peak of tubing / boating / paddling season in the summer, water quality goes down. The assumption has been that with no limits on recreational uses or the numbers of recreational users, combined with the lack of bathroom facilities, fecal and bacteria counts go up significantly during these peak user periods. With large numbers of tubers / boaters / paddlers enjoying the River, private or outfitted alike, examining summertime water quality in these areas may be a worthy addition to future Integrated Reports. Would NJDEP consider a Delaware River water sampling program in Warren County and Hunterdon County during the summer months?

Thank you for your continued support of the Wild & Scenic Partnership Program. We are pleased to have a NJDEP staff member on our Steering Committee and appreciate the engagement of the agency in our activities. The next virtual meeting of the Lower Delaware Wild & Scenic River Management Council will be held on Thursday, September 23 at 10:00 AM. The meeting notice and agenda will be posted at [www.lowerdelawarewildandscenic.org](http://www.lowerdelawarewildandscenic.org).

Sincerely,  
**Richard Dodds**  
Chairman

cc: Sarah Bursky, NPS Liaison ([Sarah\\_Bursky@nps.gov](mailto:Sarah_Bursky@nps.gov))  
Maryann Carroll, Delaware River Greenway Partnership Ex. Dir. ([maryann@delawarerivergpp.org](mailto:maryann@delawarerivergpp.org))