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October 20, 2021

Donna Rendeiro, Executive Director
NJ State Planning Commission
Department of State
P.O. Box 820
Trenton, NJ 08625-0820.

Dear Ms. Rendeiro,

The Lower Delaware Wild and Scenic River Management Council (LDWS) submits these comments in anticipation of the warehouse sprawl discussion scheduled for the Plan Implementation Committee meeting today.

Wild and Scenic Rivers Background

The Lower Delaware is a National Wild and Scenic River System segment, established by Congress on November 1, 2000, as Public Law 106-418. The segment includes 65.6 miles of River 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

The “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.

Observations and Concerns About Warehouse Sprawl

We wish share observations about the exploding phenomenon of warehouse sprawl in Pennsylvania and New Jersey. Examining this emerging issue is incredibly urgent for the small communities flanking the Delaware River in Warren, Hunterdon, and Mercer Counties. The anticipated impacts of warehouse developments on the River, on small

communities without updated transportation infrastructures, and the long-term effects on the visual and physical environment, will be significant and irreversible.

For example, in the Lower Delaware corridor, a project was approved last month for [warehouses](#) to be constructed in Tincum Township, PA along the Tohickon Creek (Bucks County) and a massive project is under review in [Upper Mount Bethel](#), PA (Northampton County) with 100-foot-tall structures proposed along the River. While these warehouses will be located on the PA side of the Delaware, they will certainly change the scenic viewscape from NJ.

Most concerning to NJ residents and officials will be the added traffic these and future PA warehouse developments will generate. Trucks traveling to and from many PA sites will be driving over river bridges for highway access in NJ. In particular, we have been tracking a 600-acre project in [White Township](#) (Warren County). This project, if built, will be visible by recreational users on the River. It will add unimaginable amounts of impervious cover to the area and will feed tractor trailer traffic through two small adjacent hamlets where no transportation improvements are planned or could realistically be built.

Similar projects are also being considered in Franklin Township (Warren County) with the same kind of implications. Just this week we heard from a resident of Franklin Township who believes new tractor trailer traffic could literally halt travel during peak times on country roads because without designated waiting areas, trucks will be forced to park on local roadways until they are permitted enter the warehouse developments. This scenario could have measurable impacts to routine personal, school, and emergency vehicle travel.

With the convenience of constructing warehouses in rural areas due to availability of land, new projects will continue to be proposed along the Lower Delaware Wild and Scenic [corridor](#). We hope you can provide guidance to NJ municipalities and counties with pending and future projects as to lessen the negative impacts of these developments on the environment and to the quality of life in sleepy Delaware River communities. Now after Hurricane Ida we are reminded that impervious cover contributes to flooding ever more so in an era of climate change. Erosion will increase, water quality will decrease, and infrastructure improvements as a result are desperately needed.

Last, keep mind the recreation economy in this region has boomed the last two years. While warehouse developments bring ratables, the same land can be used for tourism related businesses while maintaining the amazing viewshed that draws visitors to the region. Our Council is willing to work with State representatives to discuss how to promote recreation in our changing economy.

For your information, we welcome a representative of the State Planning Commission to join our Steering Committee or attend our Council meetings. This could be a staff member or appointed volunteer. The next virtual meeting of the Lower Delaware Wild & Scenic River Management Council will be held on Thursday, December 16 at 10:00 AM. The meeting notice and agenda will be posted at www.lowerdelawarewildandscenic.org. Thank you for your consideration.

Sincerely,

Richard Dodds

Chairman

cc: Sarah Bursky, Lower Delaware Liaison, National Park Service (NPS) (Sarah_Bursky@nps.gov)
Maryann Carroll, Ex. Dir., Delaware River Greenway Partnership (maryann@delawarerivergp.org)
Marion Kyde, Vice Chair, Lower Delaware Wild & Scenic River Management Council
Jodee Inscho, Director of Community Affairs, Delaware River Joint Toll Bridge Commission
Stacey Mulholland, Government Affairs Lead, Delaware River Basin Commission
Sarah Sayed, Member, Lower Delaware Wild & Scenic River Steering Committee
Adele Starrs, Mayor, Knowlton Twp, NJ
Becky Brady, Executive Director, Lehigh Valley Planning Commission, Allentown, PA
Alan Hunt, Policy Director Policy and Grants, Musconetcong Watershed Association
Julia Somers, Executive Director, NJ Highlands Coalition