



c/o Delaware River Greenway Partnership (DRGP)  
PO Box 15, Stockton, NJ 08559  
[www.lowerdelawarewildandscenic.org](http://www.lowerdelawarewildandscenic.org)

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November 20, 2020

Jason Wagner  
Township Manager  
SPRINGFIELD TOWNSHIP  
2320 Township Road  
Quakertown, PA 18951

Dear Mr. Wagner,

RE: *Concerns about G-7 Quarry:  
Potential Adverse Environmental Impacts to the Tohickon Creek*

The LDW&SR Management Plan requires the evaluation of projects that may impact the river corridor. Refer to <https://lowerdelawarewildandscenic.org/index.php/resources/documents/lower-delaware-wild-and-scenic-management-plan>. Since the proposed G-7 Quarry construction and operation could negatively impact water quality and natural resources, two goals of our Management Plan, we are writing to share our significant concerns. Specifically, adverse environmental impacts to the Tohickon Creek, a named tributary in the Management Plan need to be addressed. With an application of this magnitude, we believe the proximity to Lake Nockamixon and the Tohickon Creek must be carefully examined in the Township review process.

We implore your Board of Supervisors to listen to Township Planning Commission concerns. The lack of an environmental assessment or environmental impact statement submitted in conjunction with the G-7 Quarry application is an egregious omission. We urge the Township to not make any determination on the conditional use application until all environmental matters are formally addressed by the applicant's professionals and vetted by Township Supervisors and members of the public. In addition, we strongly encourage you to reach out to the PA-DCNR for the agency's input on potential impacts to Lake Nockamixon and the Tohickon Creek.

You may not be aware that the Tohickon Creek is one of three Pennsylvania tributaries designated along with segments of the Lower Delaware mainstem as a component of the National Wild and Scenic Rivers System. There are several aspects to this designation that bear significantly upon the water quality classification of Tohickon Creek. First, protection of water quality is one of the most important goals of the National Wild and Scenic Rivers System. In establishing the purposes of the System, the Act states:

*"It is hereby declared to be the policy of the United States that certain selected rivers of the Nation which, with their immediate environments, possess outstandingly remarkable scenic, recreational, geologic, fish and wildlife, historic, cultural, or other similar values, shall be preserved in free-flowing condition, and that they and their immediate environments shall be protected for the benefit and enjoyment of present and future generations. The Congress declares that the established national policy of dam and other construction at appropriate sections of the rivers of the United States needs to be complemented by a policy that would preserve other selected rivers or sections thereof in their free-flowing condition to protect the water quality of such rivers and to fulfill other vital national conservation purposes."*

In addition, Section 10 of the Act establishes a "protect and enhance" standard for managing all Wild and Scenic Rivers, and, specific to water quality, Section 12 of the Act states that,

*“The head of any agency administering a component of the national wild and scenic rivers system shall cooperate with the Administrator, Environmental Protection Agency and with appropriate State water pollution control agencies for the purpose of eliminating or diminishing the pollution of waters of the river.”*

Furthermore, the Lower Delaware River Management Plan (August 1997) developed as a part of the Wild and Scenic River Study, and referenced by Congress as the Plan by which the Wild and Scenic River would be managed, identifies Tohickon Creek as an “Exceptional Value Water” as defined by the PA Department of Environmental Protection (Plan, Page 27): “Exceptional Value Waters – A stream or watershed which constitutes an outstanding national, State, regional, or local resource, such as: waters on national, state or county parks or forests; waters which are used as a source of unfiltered potable water supply; waters of wildlife refuges or state game lands; waters which have been characterized by the Fish Commission as “Wilderness Trout Streams;” and other waters of substantial recreational or ecological significance.”

The number one policy listed in the Plan under this section states, “Achieve the highest practical state and federal water quality designation for the river and its tributaries.” The intent of the Wild and Scenic Rivers Act, as well as the Lower Delaware River Management Plan, are further reinforced by the “Memorandum of Understanding Implementing the Designation of the Lower Delaware River and Selected Tributaries as a Component of the National Wild and Scenic Rivers System” to which the Commonwealth of Pennsylvania is a party and signatory.

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 Wild & Scenic River Management Council (LDW&SR), a part of the National Wild and Scenic Rivers System, is comprised of nonprofits and governmental entities from New Jersey and Pennsylvania including municipalities, counties, and the states themselves.

On behalf of our Council members, we submit these comments for your consideration.

Sincerely,

*Richard Dodds*

Chairman

Lower Delaware Wild & Scenic River

cc: Sarah Bursky, Community Planner/Rivers Manager & Liaison to Lower Delaware Wild & Scenic River  
Bethany Hare, PA-DCNR Asst. Park Mgr, Ralph Stover State Park & LDW&SR Steering Committee Member  
Obie Derr, PA-DCNR Park Manager, Nockamixon State Park  
Kelly German, Resource Protection Manager, Tinicum Conservancy  
Lorna Yearwood, EAC Chair, Springfield Township, PA