



c/o Delaware River Greenway Partnership
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May 19, 2021

Upper Mount Bethel Township
387 Ye Olde Highway
PO Box 520
Mount Bethel, PA 18343

Dear Upper Mount Bethel Manager Nelson, Supervisor Pinter, and Chairman Teel,

RE: River Pointe Logistics Center

We are writing to share comments and resources in response to the anticipated River Point Logistics Center development proposal. You are probably already aware that Upper Mount Bethel lies along a Federally designated Wild and Scenic River. 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 Lower Delaware Wild and Scenic Management Council is the collaborative group that together addresses issues along the River, and is comprised of members of local municipalities, nonprofits, State and Federal representatives. We understand that Upper Mount Bethel is in a critical moment of determining how to build economic growth while also balancing the needs of the community, and other opportunities that come with its land and water resources.

It is worth pausing to explore how protecting the River, and growing the scenic and recreation potential, offers tremendous economic opportunity for Mount Bethel, given the booming recreation industry. Recently Pennsylvania ranked 6th in the country for its recreation economy, bringing in \$13 billion in outdoor recreation dollars. As you already know, the Lower Delaware Wild and Scenic River saw unprecedented recreation use in 2020, to the point where parking areas, State Park facilities, and tubing operators could not keep up. The Commonwealth of Pennsylvania found in 2020 user surveys that paddling is the most popular and growing recreation activity. The resource Upper Mount Bethel has in its viewsheds, and the potential it has in its lands along the Wild and Scenic River, is unparalleled in its recreation value.

In this way, our Council agrees with many of the points made by the Lehigh Valley Planning Commission in their letter of October 30, 2020. As noted in the Commission letter,

The Township has a unique opportunity to leverage unprecedented development interest with the long-term interests of the community by further amending the Planned Industrial Park regulations to ‘match development intensity with sustainable infrastructure capacity’ (of Policy 1.1), to ‘protect high-priority natural lands and water resource (of Policy 3.1), ‘protect high-priority natural lands and water resource (of Policy 3.1) and ‘preserve key scenic corridors and viewsheds’ (of Policy 4.4).

We welcome having additional conversations with you about the potential to protect the River while growing the economy. The Council respectfully requests your consideration of the following recommendations as you move ahead in the planning and approval process for the River Pointe development. Please consider and discuss these matters during meetings with the developer, in Supervisor meetings, as well as in land use hearings:

- **Partner with Governmental Entities and Nonprofits**

See the potential in collaborating with the Lower Delaware Wild and Scenic River Council, PA DEP, PA DCNR, American Farm Trust, or smaller, more local organizations such as the Heritage Conservancy to explore the recreation potential of land along the River, accesses to the River, possible parks and the like. Our Council would be glad to be a resource to the Township to support sustainable economic growth while protecting critical viewsheds. We have some funding for planning and other needs, and also have links to technical expertise through the National Park Service.

- **Protect the Viewshed from the River**

As noted by the Lehigh Valley Planning Commission in their letter, it was not clear from the amendment how the determination would be made as to the impact the warehouses will have on the viewshed. We respectfully request this be made explicitly clear. We suggest:

1. **Clear Renderings** - Require renderings from critical viewing points on and along the River so the images can be considered by your boards and shared with the public. Specifically, require photographic and video renderings to provide a comprehensive perspective looking out from:
 - * The development towards the River,
 - * The New Jersey side of the River towards the development,
 - * The River directly in front of the development looking up,
 - * The River at locations North and South of the development, and from,
 - * The Portland Columbia Toll Bridge.
2. **Greenspace Along River** - Assign the greenspace required in the Township development ordinance to be primarily adjacent to the River between the development and the riverbank.
3. **Landscape Buffer Along River** - Require substantial supplemental landscaping along the River to create additional buffering. Limit the amount of tree removal along the River.
4. **Building Height Reduction** - Evaluate the extreme height of the buildings that will tower over the River. Only approve scaled down structures.

- **Consult with the National Park Service (NPS)**

We noticed that in major planning documents, PA DEP and the Army Corps of Engineers were cited for having permitting authority with regard to NPDES permits and soil and erosion. The National Park Service was not mentioned. Any work on the River or mapped tributaries of the Lower Delaware Wild and Scenic River, that necessitate Clean Water Act permitting, would require consultation with the National Park Service for water resource project reviews under the Wild and Scenic Rivers Act. Further, any project involving other types of federal assistance might involve National Park Service consultation should the project affect critical viewsheds or otherwise affect wildlife or recreation.

- **Guarantee Effective Stormwater Management**

Take great care in examining the impacts of increased impervious cover, tree removal, and soil erosion along steep slopes. Ensure that the development will not have any negative impacts on River water quality during construction and into the future. Refer to page 24 of the Lower Delaware Management Plan at:

<https://www.lowerdelawarewildandscenic.org/resources/documents/lower-delaware-wild-and-scenic-management-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.

In addition, our Stewardship Handbook can be found at

<https://www.lowerdelawarewildandscenic.org/resources/documents/guides/stewardship-handbook>. Pages 10-15 of the Handbook also includes commentary about storm water management and water quality.

Thank you for your consideration. We hope we can partner together as Upper Mount Bethel examines the anticipated development. Please advise Lower Delaware when site plans are submitted to the Township.

Sincerely,

Richard Dodds

Chairman

cc: Sarah Bursky (Sarah_Bursky@nps.gov), Lower Delaware National Park Service Liaison
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