



c/o Delaware River Greenway Partnership
PO Box 15, Stockton, NJ 08559
www.lowerdelawarewildandscenic.org

February 11, 2020

Kathleen R. Reinalda
Township of White
Municipal Building
555 CR 519
Belvidere, NJ 07823

Dear Ms. Reinalda:

RE: Comments on Jaindl Warehouse Development Proposal

Last August we wrote to share information about the Wild and Scenic River Partnership Program. We strive to work collaboratively with municipalities when development projects may affect the River. Therefore, the Lower Delaware Wild and Scenic River Management Council submits comments to the White Township Planning Board as the Jaindl development is now under review.

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 and includes 38.9 miles of the Delaware River which forms 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 administering the Wild and Scenic Rivers Act. NPS works closely with the Lower Delaware Wild and Scenic Management Council, which was 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 local nonprofits. The Lower Delaware Wild & Scenic River Management Plan (August 1997) was developed as a part of the Wild and Scenic River Study, and 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 scenic resources, ecological resources, and water quality as key attributes of the River that must be “protected and enhanced.” The Management Council focuses on the area of the Delaware River south of the Delaware Water Gap and north of Trenton.

General Recommendations

- **Mature Trees** – Retain mature trees along the riverfront wherever possible to help protect the water from erosion and to attract local and migrating birds. Incorporate additional tree buffers along the development to help soften the scenic viewshed.
- **Impervious Cover:** Make project recommendations to limit impervious cover.
- **Stormwater Management:** Verify the proposal meets or exceeds all NJDEP requirements for stormwater discharge and stormwater retention. Avoid any additional discharge into the River to preserve the quality and quantity of the flow.

- **Stream Identification:** Streams and stream buffers impacted by site development must be properly identified on all site plans and should be protected during construction, including the Buckhorn Creek and its Category One 300 foot buffer.
- **Septic System:** The septic system should be designed to accommodate all employees and visitors.
- **Historic Hamlets:** Consider the impact of new truck traffic on other communities near White Township.

Outside Approvals

- **Soil Erosion Plan:** The soil erosion and sediment control plan should be reviewed and certified by the Warren County Soil Conservation District. Soil erosion controls should be in place prior to the start of construction.
- **Highlands Review:** The development proposal should be submitted to the Highlands Council for consistency with the Highlands Act and the Highlands Regional Master Plan.

Wild & Scenic/National Park Service (NPS) Resources

- **Open Space Planning:** As you gather local input to consider a park and/or open space for part of the site, our Management Council and Sarah Bursky (Sarah_Bursky@nps.gov), NPS Community Planner/Rivers Manager, would be glad to collaborate and brainstorm.
- **Reference Documents:** There are two documents that would be of interest to the Township. First, our Management Plan can be found at: <https://lowerdelawarewildandscenic.org/index.php/resources/documents/lower-delaware-wild-and-scenic-management-plan>. Specifically, see page 24:

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 agricultural 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, pages 10-15 of our Stewardship Handbook

(<https://www.lowerdelawarewildandscenic.org/index.php/resources/documents/guides/stewardship-handbook>) also includes commentary about stormwater management and water quality.

Feel free to contact Maryann Carroll (maryann@delawarerivergp.org), Executive Director of the Delaware River Greenway Partnership. She serves as the administrator of the Lower Delaware Wild and Scenic River Management Council and would be glad to answer any questions.

Thank you for your consideration.

Sincerely,

Richard Dodds

Chairman