



United States Department of the Interior



NATIONAL PARK SERVICE
Interior Region 1
North Atlantic-Appalachian
1234 Market Street, 20th Floor
Philadelphia, PA 19107

IN REPLY REFER TO:

1.A.2.(IR1-RSS)

Upper Mount Bethel Township
Attn: Board of Supervisors
387 Ye Olde Highway
P.O. Box 520
Mount Bethel, PA 18343

Dear Board of Supervisors:

I am writing on behalf of the National Park Service (NPS) to convey our concerns on the planning approval for the River Pointe Logistics Park Development (the Development), which is proposed in Upper Mount Bethel Township. The large scale of the Development (725 acres) has the potential to substantially change the landscape of the western boundary of the Delaware River corridor in eastern Pennsylvania. As such, it also holds the potential to impact key NPS resources in the immediate and adjoining areas. The NPS has several important resources in the project area, including the Appalachian National Scenic Trail, Delaware Water Gap National Recreation Area, and the Lower Delaware Wild and Scenic River. We would like to partner and assist Upper Mount Bethel Township with the planning for this project, and our joint future while working to identify, address, and mitigate potential impacts of this project on NPS resources.

NPS Resources

Appalachian National Scenic Trail

The Appalachian National Scenic Trail (ANST) is a 2,190+ mile-long public footpath that traverses the scenic, wooded, pastoral, wild, and culturally resonant lands of the Appalachian Mountains from Maine to Georgia. The Trail was conceived in 1921, built by a consortium of agencies and private citizens, and opened as a continuous trail in 1937. Congress officially recognized the national significance of the Appalachian Trail when it designated it as one of the first National Scenic Trails with the passage of the National Trails System Act in 1968. The National Park Service is charged under this Act with administration of the ANST in cooperation with the US Forest Service, Appalachian Trail Conservancy, numerous state agencies and thousands of volunteers. The ANST is enjoyed by an estimated 3.5 million people each year and lies within a day's drive of two thirds of the U.S. population. It is also the largest protected contiguous corridor east of the Mississippi River.

Delaware Water Gap National Recreation Area

The Delaware Water Gap National Recreation Area, designated in 1965, is a nearly 70,000 acre national park unit located in Pennsylvania and New Jersey, and also includes the 40-mile Middle Delaware National Scenic & Recreational River. The purpose of Delaware Water Gap National Recreation Area and the Middle Delaware National Scenic and Recreational River is to preserve the natural, cultural, and scenic resources and values of the Delaware River valley. Among the numerous significant and important sites in the park is the Delaware Water Gap geologic formation, near the southern boundary of the unit. Important values of the park include the scenery and viewsheds of the Delaware Water Gap from the river valley and from the mountain tops of Mt. Minsi and Mt. Tammany. The Middle Delaware National Scenic & Recreational River was designated in 1978 and among its values under the Wild & Scenic Rivers Act includes water quality, aesthetics, and scenery.

The Lower Delaware Wild and Scenic River

The Lower Delaware Wild and Scenic River, including Tinicum, Tohickon and Paunacussing Creeks were designated into the National Wild and Scenic River System under Public Law 106-418 in 2000. The rivers were designated for their free-flowing condition, water quality and their Outstandingly Remarkable Values (ORVs) including cultural, ecological, recreational, geological, and scenic. These ORVs are described in detail in the *Lower Delaware River Management Plan* (1997), *Lower Delaware Wild and Scenic River Study Report* (1999), and the *Delaware River Basin National Wild and Scenic River Values* (2012).

Potential Concerns

We reviewed the information on the proposed project that is currently available to the public and have potential concerns on the project's impact on the viewshed from the Appalachian National Scenic Trail and Mt. Tammany at Delaware Water Gap National Recreation Area and for boaters along the Wild and Scenic Rivers. We are also concerned about the potential direct and indirect impacts on the water quality of the river from stormwater runoff associated with the project. As more information becomes available, we expect additional impacts to NPS resources as the project progresses from construction to completion over the years-long construction period.

River Pointe Logistics Park is the largest proposed development of its kind in this section of the Delaware River. We recognize the challenges of integrating economic development and the protection of natural systems. This and other proposed industrial development projects are especially complex, with impacts both direct and indirect, in the near-term and long-term. We believe that the time to identify and address those impacts is now. The NPS would like to participate in the planning process and be part of a thorough and comprehensive review of the project in its earliest stage.

Conclusion

The NPS is not opposed to development or to improving the economic future of Northampton County. Our Parks and Rivers contribute to a booming recreation economy in the State of Pennsylvania, and we support solutions that will enhance the quality of life of residents and help us fulfill the mandate of Congress to preserve NPS resources for the benefit of all Americans.

If you have questions, please contact Mark Eberle at the National Park Service, Region 1 Office at 267-315-1631 or via email at mark_eberle@nps.gov. We look forward to future collaboration on regional development projects.

Sincerely,

Jonathan Meade
Associate Regional Director
Resource Science and Stewardship

cc:

Laura Belleville, Appalachian Trail Conservancy
Rachel Lettre, Appalachian Trail Conservancy
Maya K. van Rossum, Delaware Riverkeeper Network
Karen Tiesling-Keenan, Friends of Delaware Water Gap
Richard Dodds, Steering Committee-Lower Delaware Wild and Scenic River
Robert J. Jevin, Pennsylvania Department of Environmental Protection