

Dingman Township

Municipal Offices



118 Fisher Lane, Milford, PA 18337

November 19, 2019

Delaware Water Gap
National Recreation Area
ATTN: DEWA VUM Plan Team
1978 River Road
Bushkill, PA 18324

To whom it may concern:

The Dingman Township Board of Supervisors respectfully submit the following comments on the Draft Visitor Use Management Plan:

1. The Board agrees and seconds the comments submitted by the Lehman Township Board of Supervisors dated November 1, 2019 (copy enclosed).
2. The Board is adamantly opposed to the "park-wide entrance fee" should that fee equate to a fee charged to **all** vehicles traversing Rt. 209 (or other through-roads) regardless of whether they are commuters passing through, or actual Park visitors. Local residents should **not** be required to pay what would amount to a "toll" to travel Rt. 209 to work, school, doctors appointments, hospitals, shopping, etc.
3. If all vehicles are directed through a toll booth on Rt. 209, a very real potential for delays and traffic back-ups exists that will impact communities adjacent to the toll booths.
4. The Plan should acknowledge that the local communities bordering the National Recreation Area (NRA) already support the "Park" by providing Emergency Medical Services and also fire and rescue assistance. These services are funded by the local municipalities through taxes paid by their residents; the "manpower" is provided by trained volunteers dedicated to serving their neighbors. In addition, the services provided to the Park are not reciprocated (i.e. Mutual Aid).
5. In 2022 the Pennsylvania Department of Transportation will be replacing a bridge at the northernmost end of the NRA where Rt. 209 crosses the Sawkill Creek in Dingman Township and Milford Borough. Should the bridge be closed during reconstruction (which appears likely), detours will inevitably include Rt. 209 and other roads through the "Park" as they are the only viable transportation

alternative for local traffic. The tolling or closure of roads within the "Park" will compound what is expected to be a horrendous traffic jam.

The Visitor Use Management Plan needs to acknowledge that the Delaware Water Gap National Recreation Area is not self-contained, but is interwoven into the surrounding communities and the daily life of their residents - especially in regards to the road network. Sadly, more often than not, the powers that be within the Recreation Area lose sight of this reality.

Respectfully,

DINGMAN TOWNSHIP BOARD
OF SUPERVISORS

Thomas E Mincer
Thomas E. Mincer, Chairman

Dennis L. Brink
Dennis L. Brink

Edward D. Nikles
Edward D. Nikles



Lehman Township Board Of Supervisors

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An Open Letter to Delaware Water Gap National Recreation Area (DEWA), Elected Officials in Pike and Monroe County, Elected Federal Officials and Residents

November 1, 2019

The Lehman Township Board of Supervisors initial objective is to raise the controversy of tolling U.S. Rt. 209 sufficiently that all elected officials feel the public heat to ask one single public expectation, that DEWA return to the drawing board and produce a DRAFT #2 that requires a public committee engaged in the process with DEWA, and the DEWA commitment to produce the substantiating reports needed as a basic due diligence to justify any DEWA decisions.

100% public opposition to charging for DEWA road use

After listening to residents in the past two meetings with DEWA – it is clear that there is 100% opposition to the DEWA proposal to charge residents to use U.S. Rt. 209 and the other DEWA roads to travel between their homes, schools, businesses and places of work.

Essential information is missing in the Visitor Use Management Plan (VUMP) Draft

Essential facts or even descriptions of the processes used to arrive at NPS conclusions are not included in the VUMP Draft. No other public agency would attempt to propose such a radical change to public life without performing substantial due diligence. If NPS has performed basic studies to justify the conclusion of the VUMP Draft, they have withheld them from public review.

The VUMP was drafted to support a foregone conclusion

Everyone understands that NPS and DEWA as a “Park” unit needs to help raise funds from users to support the mission, goals and mandate for federal lands. But all alternatives – especially strategic partnerships need to be publicly explored to fairly arrive at equitable decisions. The current VUMP strategy to toll DEWA roads – cynically relies on the local population to bear the burden of this funding scheme – because NPS has calculated locals to be “captive” payers who will have no alternative than to pay the toll to continue to live in their homes. And DEWA is betting that they can maneuver the road toll strategy within the veil of a Visitor Use Plan – before the public understands and can react against its absurdity.

Road tolling needs to be defined separately from DEWA “User Fees”

There are many current user fees and some reasonable new ideas for raising funds for DEWA from users of the “park.” To ensure the conversation is clear, the public will not buy into the DEWA public relations campaign that tolling the “park” roads is simply just a user fee. It is not. Tolling local residents to travel to and from their homes will not be allowed to be discussed under the guise of park “user fees.” Road tolling is quite different than user fees. And the public impacts of road tolling have not even been studied by the NPS.

NPS and DEWA politely and methodically erode partnerships attempts – to the detriment of our collective resources

Listening, lip service and changing messages have become known as the standard DEWA public involvement strategy. Attempts by partners to participate in the park stewardship are consistently thwarted by hidden NPS policies and scores of delay tactics. The bottom line is that DEWA has long ago decided that it is better for resources to rot under its sole jurisdiction than to work in partnerships. This

needs to change. And tolling the public roads – our transportation lifelines does not satisfy our doubts the DEWA can ever steward the “park” without engaged partners.

Partnerships are needed in this time of the world – NPS needs to change its isolation policy

Every other public steward entity understands that partnerships are essential to conservation. The NPS shuns this notion and has operated in isolation. DEWA is the poster child for excluding the public and conservation partners from caring for our local federal lands. The new DEWA idea of tolling the public roads is an exponential attempt to isolate the public from the park. It is intentional exclusionary policy by NPS and will not be allowed to stand. There are other NPS partnership models around the nation. These need to be deeply explored by DEWA with local partners before jumping into extreme measures such as tolling public roads.

Re-inhabiting DEWA

The NPS does not have the resources to fulfill its mandate at DEWA, but also has never fully engaged with partners interested in helping – except perhaps Peters Valley and Pocono Environmental Education Center (PEEC). Managed degradation is the conscious result of this NPS policy. Locals evicted to flood the valley for the failed Tocks Island Dam project and their kin remain physically and emotionally connected to their river valley. Local people still seek ways to protect the public resources and herald the dramatic history of this part of the Delaware Valley. While people cannot actually re-inhabit the federal lands – new ways need to be actively explored how locals can interface as ombudsmen with visitors inside the park – to help translate conservation rules and explain the rich history in ways NPS staff cannot do – or at least do alone.

DEWA declares war against locals

Tolling DEWA roads has not been proven by DEWA as an answer to its budget problems – and proposing it as a solution without proof is a declaration of war against regional residents. Lehman Township will fight this ill-conceived, prejudiced strategy by NPS at DEWA.

Sincerely,
Lehman Township Board of Supervisors

Robert H. Rohner, Jr.
Richard C. Vollmer
Theresa R. Laino