



DELAWARE WATER GAP NATIONAL RECREATION AREA

FINAL TRAILS PLAN

ABBREVIATED ENVIRONMENTAL IMPACT STATEMENT

NOVEMBER, 1999



SCANNED

7/5/00

ABSTRACT



This Final Trails Plan/Environmental Impact Statement presents a proposal and two alternatives for the designation of a park-wide trails system at Delaware Water Gap National Recreation Area. This document also describes the environment that will be affected, and the environmental consequences of implementing this action. The alternatives under consideration, in addition to the proposal, include the no-action alternative and one designation option.

Alternative A describes the current trails system without a change in designation or management and constitutes the no-action alternative. Alternative B, the park's proposed plan, proposes the designation of a system based on four networks. This alternative would increase the number of trails in the park, provide more mileage for various uses, and improve visitor facilities and interpretive experiences. Linkages between trails inside the park and activities outside the boundaries would be encouraged. Alternative C proposes a series of smaller independent networks clustered around significant park resources that would also increase the number of trails and mileage, but provide for fewer linkages between or beyond each network. Both action alternatives (B,C) would include the development of a coordinated

trail signage system and improvements to access and visitor facilities.

This plan will become final upon signature of a record of decision by the Northeast Regional Director approximately 30 days after issuance of the plan.

Questions on this final document should be addressed to:

Superintendent
Delaware Water Gap National
Recreation Area
1 River Road
Bushkill, PA 18324.

For further information regarding this document, please contact the Superintendent at (570) 588-2418.

FOREWORD

This Final Environmental Impact Statement for the Delaware Water Gap National Recreation Area is presented in an abbreviated format. It must be integrated with the Draft Trails Plan/General Management Plan Amendment/Environmental Impact Statement issued in June 1999, to be considered a complete document reflecting three alternatives and all significant environmental impacts. **The two documents together compose the complete Final Environmental Impact Statement.**

The abbreviated format has been used for the Final Environmental Impact Statement because the changes to the draft document are minor and confined primarily to factual corrections, which do not modify the analysis. Use of this format is in compliance with the 1978 implementing regulations (40 CFR 1503.4(c)) for the National Environmental Policy Act of 1969.

This abbreviated Final Environmental Impact Statement is composed of five parts: the abstract, foreword, summary, errata, and comments and responses. The cover sheet lists the responsible agencies and contact persons, and designates the status of the statement (final or draft). The foreword describes the elements of the abbreviated Final Environmental Impact Statement. The summary provides an overview of the park and its resources,

and briefly describes the proposal and alternatives that were presented in the draft plan. The errata section identifies and corrects any errors and shows any necessary revisions to the Draft Trails Plan/General Management Plan Amendment/Environmental Impact Statement. The comments and responses address or otherwise respond to all substantive comments received during the public review period.



SUMMARY

The Delaware Water Gap National Recreation Area (DWGNRA) is the largest natural area in the National Park System between Virginia and Maine and is among the ten most visited in the entire system. Much of this visitation is from nearby, rapidly expanding New York, northern New Jersey and Philadelphia metropolitan areas, and is growing at a steady rate. Although the park encompasses 67,000 acres of woodlands, farms, mountains, creeks, and the Delaware River, it does not have a designated trail system. Prior to the creation of DWGNRA, small communities with extensive road networks dotted the landscape. Local residents developed paths leading to important natural and cultural features that were expanded as part of the growing resort and recreation industry. These old roads and informal paths now serve as trails in the park.

The park's 1987 General Management Plan (GMP) outlined a potential system for trail development that has influenced the location of current trails in the park. Although the GMP continues to be used as a general guide for trail management, it is no longer adequate to address the policy and operational issues now facing park managers. Recent concerns about potential impacts on habitat areas for rare, threatened and endangered species, user conflicts and dissatisfaction with the

limited number of trails and facilities prompted park management to recognize the need for a comprehensive trails plan that would address the long-term needs of visitors while protecting resources.

This Final EIS (FEIS) presents and analyzes three alternatives for the designation of a trail system at DWGNRA. It responds to the park's mission and goals established for the new trail system. The FEIS has been prepared to satisfy the requirements of the National Environmental Policy Act (NEPA) of 1969, as amended, which requires the evaluation of potential impacts resulting from federal actions. It includes a description of the environment affected by the proposed activities and the environmental consequences of implementing any of the alternatives.

ALTERNATIVE A: CONTINUATION OF CURRENT MANAGEMENT

This alternative describes the current situation and assumes the continuation of current management practices for trails. It provides a baseline for comparison with the other alternatives, as required by the National Environmental Policy Act regulations. Alternative A retains the management guidance of the 1987 General Management Plan. The park would continue to operate without a designated trail system and the overall scope of trail development in the park would not be

defined. Existing trails and facilities would remain, including some recognized park trails, the Appalachian National Scenic Trail and a maze of old road traces and informal trails that are not connected. All new development would be considered on an individual basis would only occur with the cooperation of a user group or if specific funding were available for construction. Park staff would continue to direct visitors to recognized park trails associated with specific park attractions. Obvious resource degradation would be handled on an individual basis, often by closing the affected section of trail. Unnoticed resource degradation and cumulative impacts, if any, would likely continue.

No change in the park's enabling legislation or boundary would be sought.

ALTERNATIVE B: MULTIPLE LINKING NETWORKS

This alternative, the park's proposed plan, would designate a parkwide trail system that would define an overall scope of trail development within the park. Alternative B represents the full potential for trail development in the park within known environmental and resource protection constraints. This alternative would double the amount of present park trail miles and provide the greatest opportunities for hiking, biking, cross-country skiing, and equestrian activities. Trails would be

organized into four individual networks: the Appalachian, Country Road, Gap View and River Valley. Visitor experience and natural features determine each of these networks with connections to each other and various trail opportunities outside the park. Comfort facilities, signage and interpretation would be expanded as formalized trailheads were developed.

No change in the park's enabling legislation or boundary would be sought.

ALTERNATIVE C: INDEPENDENT NETWORKS

This alternative would also designate a park-wide trail system and define an overall scope of trail development within the park. Alternative C does not utilize the full potential for trail development within the park. This alternative also emphasizes networks and different visitor experiences, but is organized in small distinctive geographic areas that emphasize a specific use and interesting park attractions. Some larger networks such as the Appalachian and River Valley are included, as well as trails that lead to a particular destination point. Comfort facilities, signage and interpretation would also be expanded as formalized trailheads were developed.

No change in the park's enabling legislation or boundary would be sought.

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MAPS

Alternative B:

Multiple Linking Networks

See Chapter 2; Alternative B, page 22

CORRECTIONS TO THE JUNE 1999 TRAILS PLAN

TRAILS EVALUATION

Page 14, paragraph 1, change text to read:

In addition to these evaluation criteria, other planning considerations included the visions and future development efforts of all neighboring jurisdictions; the use of existing trails and road traces where possible; and the need to accommodate parking and trailheads. Also considered were design guidelines for development ~~also were considered. These include:~~ taken from a number of sources, including NPS standards, Federal Highway Administration, Rails to Trails Conservancy, and others.

- Hiking trails should have a minimum 3-foot tread width of compacted bare soil. The vertical clearance should be 8 feet minimum.
- The tread width for equestrians is 5 feet minimum with 8 feet preferred when both equestrians and hikers share a trail. The surface can be compacted bare soil or gravel. The vertical clearance for equestrians is 10 feet minimum.
- Trails designed for cross-country skiing should have a minimum tread width of 4 feet with a vertical clearance of 7 feet above the average snow level.
- Snowmobile trails require an 8-foot tread width with 2-foot shoulders clear of branches and debris.
- Trails designed for multiple uses such as hiking and biking should be constructed of compacted gravel and have an 8-foot minimum tread width.

These trails require 2-foot shoulders clear of branches and debris adjacent to the tread. The vertical clearance should be a minimum of 8 feet.

Paragraph 2 to read:

The trail system planning included discussions concerning accessibility. As part of the trails planning effort, a preliminary evaluation for accessibility was done on some trail segments in accordance with the Recreation Opportunity Spectrum (ROS) classification. This classification was developed by the USDA Forest Service and further refined by *The Design Guide: Universal Access to Outdoor Recreation*, published by PLAE, Inc, 1993. The ROS divides recreation settings into four basic categories from urban to primitive and then rates the individual trail segments from easy to most difficult. The ROS is based upon three premises: 1) People purposefully choose settings for their recreation activities; 2) Choices are made with the expectation of achieving particular recreation experiences. 3) It is desirable, from a planning perspective, to present a diverse spectrum of activity and recreation setting opportunities, ranging from highly developed to primitive, from which people may choose. It is anticipated that detailed evaluations and ratings will be completed on all trail segments as they are implemented.

OVERVIEW OF ALTERNATIVES

Page 15, paragraph 1, change text to read:

ALTERNATIVE A: CONTINUATION OF CURRENT MANAGEMENT

This alternative describes the current situation and assumes the continuation of current management practices for trails. It provides a baseline for comparison with the other alternatives, as required by the National Environmental Policy Act regulations. Alternative A retains the management guidance of the 1987 General Management Plan. The park would continue to operate without a ~~coordinated~~ designated trail system and the overall scope of trail development in the park would not be defined. Existing trails and facilities would remain, ~~as it currently exists including~~ some recognized park trails, the Appalachian National Scenic Trail and a maze of old road traces and informal trails that are not connected. All new development would be considered on an individual basis and ~~either supported by~~ would only occur with the cooperation of a user group or if specific funding were available for construction. Park staff would continue to direct visitors to recognized park trails associated with specific park attractions. ~~Resources already impacted from overuse would continue to experience degradation.~~ Obvious resource degradation would be handled on an individual basis, often by closing the affected section of trail. Unnoticed

resource degradation and cumulative impacts, if any, would likely continue.

ALTERNATIVE B: MULTIPLE LINKING NETWORKS

This alternative, the park's proposed plan, would designate a parkwide trail system that would define an overall scope of trail development within the park. Alternative B represents the full potential for trail development in the park within known environmental and resource protection constraints. This alternative would double the amount of present park trail miles and provide greater the greatest opportunities for hiking, biking, cross-country skiing, and equestrian activities. Trails would be organized into four individual networks: the Appalachian, Country Road, Gap View and River Valley. Visitor experience and natural features determine each of these networks with connections to each other and various trail opportunities outside the park. Comfort facilities, signage and interpretation would be expanded as formalized trailheads were developed.

ALTERNATIVE C: INDEPENDENT NETWORKS

This alternative would also designate a parkwide trail system and define an overall scope of trail development within the park. Alternative C does not utilize the full potential for trail development within the park. This alternative also emphasizes networks and different visitor experiences, but is organized in small distinctive geo-

graphic areas that emphasize a specific use and interesting park attractions. Some larger networks such as the Appalachian and River Valley are included, as well as trails that lead to a particular destination point. Comfort facilities, signage and interpretation would also be expanded as formalized trailheads were developed.

ALTERNATIVE A: CONTINUATION OF CURRENT MANAGEMENT PRACTICES

RESOURCE PRESERVATION

Page 16, paragraph 1, change text to read: Trails would remain in their current locations. ~~Any existing~~ Existing impacts to resources would continue to be handled on an individual basis as they were discovered by park staff or cooperators. Any undiscovered impacts would likely continue. Erosion, vegetation loss and habitat disturbance would occur due to overuse and crowding. In extreme cases, trails would be closed. Informal trails would continue to develop because of limited choices and unacceptable conditions caused by lack of appropriate design and maintenance.

VISITOR USE AND FACILITIES

Page 17, paragraph 2:

Existing trails and related facilities would be retained in their current locations and conditions. New trails would be added on an individual basis when either a user group made a commitment of funds for development and volunteers for maintenance or if specific funding were available for construction. Specific references in the current GMP to proposed new trails would guide development. The overall scope of trail development parkwide would not be defined and trail development would not necessarily be coordinated toward a common goal. Facilities for parking and restrooms would be limited to the ~~23~~ 24 existing lots in conjunction with developed areas. Lack of parking and restroom facilities at overcrowded areas would continue to promote degradation of adjacent vegetation and unsafe conditions along roads.

ALTERNATIVE B: MULTIPLE LINKING NETWORKS

Page 19, paragraph 1, change to read:

DWGNRA is defined by its distinctive landscape and features: a river valley with wooded mountain ridges, agricultural fields, streams, creeks and ravines, and historic villages and buildings. These features and the opportunities they provide for a high quality visitor experience are the organizing foundation for this alternative. Under this alternative, the park would designate a trail system organized into four networks: the Appalachian, Country Road, Gap View and River Valley. Each network

would contain a series of trails that enhance a particular visitor experience and provide for specific uses. **Alternative B** represents the full potential for trail development in the park within known environmental and resource protection constraints. All trail development would be coordinated toward a common goal and the full scope of trail development parkwide would be defined.

VISITOR USE AND FACILITIES

Opportunities to explore the park in a variety of ways would be increased. This system would comprise 53 trails totaling approximately 223 miles. Approximately 34 miles of the total would require new construction. Hiking would continue to be a designated use of all trails. Many new multi-use trails throughout the park would be developed, increasing mileage for biking to 95 miles, horse use to 19 miles and cross country skiing to 93 miles.

Country Road Trail Network

Page 20, Proposed Trails: delete text

Van Campens to Rattlesnake Connector

OPERATIONS, PARTNERSHIPS, AND COOPERATIVE ACTIONS

Page 21, first paragraph, change word to read:

Wilmington Trail Club

ALTERNATIVE C:

INDEPENDENT NETWORKS

First paragraph, change text to read:

This alternative also emphasizes networks and different visitor experiences, but is organized in 14 small distinctive geographic areas that emphasize a specific use and park attractions. Some larger networks such as the Appalachian and River Valley are included, as well as **individual** trails that lead to a particular destination point. Comfort facilities, signage and interpretation would also be expanded as formalized trailheads were developed. Under Alternative C, trail development **would be coordinated toward a common goal and the full scope of trail development parkwide would be defined.** However, Alternative C does not utilize the full potential for trail development within the park.

TRAIL DESCRIPTIONS

Page 26, first paragraph, add text to read:

The proposed trails described here are based on the best information available to park staff at this time. As individual trails are considered for development, site-specific studies would be done and the information used to guide the location and design of the individual trail.

Page 27, change text to read:

APPALACHIAN NATIONAL SCENIC TRAIL

Northampton and Monroe Counties, Pennsylvania; Warren and Sussex Counties, New Jersey

ALTERNATIVE A: Present Park Trail

Description: The 27.3 mile National Scenic Trail is dedicated to through hikers who are travelling from Georgia to Maine, or for those who wish to experience smaller portions of the trail. The segment of the trail which runs through the park is considered to be moderate hiking.

Access & Facilities: Parking at Red Dot, Kaiser, Camp Road, Lake Lenape, Rattlesnake Swamp, Skyline, and Blue Mt. Road Trailheads. Parking and restrooms available at Dunnfield, Coppermine, and Buttermilk Falls Trailheads.

Improvements & Maintenance: The AT is managed through cooperative agreements and Memoranda a Memorandum of Understanding with both the Appalachian NST Park Office and the Appalachian Trail Conference. The Wilmington Trail Club is responsible for maintaining the PA portion of the AT and the NY-NJ Trail Conference, the NJ section.

ALTERNATIVE B: Appalachian Trail Network/Gap View

Description: Same as Alternative A

ALTERNATIVE C: Appalachian Trail Network/Gap View

Description: Same as Alternative A

BLUE BLAZE

Warren County, New Jersey

ALTERNATIVE A: Present Park Trail

Description: A very popular hiking trail which branches off the Appalachian Trail from the Dunnfield Creek drainage and ascends, with steep and rugged sections, up the backside of Mt. Tammany to a wonderful viewpoint overlooking the water gap. The trail then joins with another popular trail, the Red Dot, providing an opportunity for an alternate route down the mountain. This is a heavily used loop hike blazed with blue dots and is approximately 1.5 miles in length. The trail lies within both DWGNRA and Worthington State Forest and is maintained by the NY-NJ Trail Conference.

Access & Facilities: Parking available at Red Dot Trailhead.

Parking and restrooms available at Dunnfield Trailhead.

Improvements & Maintenance: Park staff maintain section within boundary and assist Worthington State Forest with improvements when necessary. The Appalachian Mountain Club, park staff, and State Forest staff work cooperatively to maintain and manage the trail.

ALTERNATIVE B: Appalachian Trail Network/Gap View Network

Description: Same as Alternative A

ALTERNATIVE C: Appalachian Trail Network/Gap View Network

Description: Same as Alternative A

Page 30, change text to read:

DINGMANS CREEK TRAIL

Pike County, Pennsylvania

ALTERNATIVE A: Present Park Trail

Description: A 1-mile raised boardwalk hiking trail along the Dingmans Creek.

Access & Facilities: Parking and restrooms available at the Dingmans Fall Trailhead

Alternative B: River Valley Network

Description: This 5.3 mile trail extends from the Dingmans Launch to the McDade Trail and continues west along the Dingmans Creek drainage to the Childs Park picnic area. The 0.35 mile section from Dingmans Launch to the McDade Trail would be multi-use, including hiking, biking and cross-country skiing. The section from the McDade Trail to Childs Park would be a A-moderately strenuous natural surfaced hiking trail with a segment constructed of raised boardwalks. The hiking trail passes through the Dingmans Falls developed area, which includes one mile of trail with raised boardwalks passing through hemlock groves and mountain laurel barrens, and going past Silver Thread Falls and Dingmans Falls. The hiking trail steeply rises on steps above the falls then follows the gentle rise of the creek to Childs Park.

Access & Facilities: Parking and restrooms available at Childs Park, Dingmans Falls and Dingmans Launch Trailheads.

Improvements & Maintenance: 1.25 miles of new construction will be necessary.

Alternative C: Dingmans Creek Network

Description: Same as Alternative B

Page 35, change text to read:

MC DADE RECREATION TRAIL

Improvements & Maintenance: Sections of old road traces will be surfaced with crushed gravel along with 18 miles of new construction.

Page 38, change text to read:

RED DOT TRAIL

Warren County, New Jersey

Alternative A: Present Park Trail

Description: This steep and rugged 1.5 mile trail, with red dot blazes, leads up Mt. Tammany, eventually joining the Blue Blaze Trail at a spectacular overlook of the Gap area. The trailhead for the Red Dot Trail is at the Department of Transportation Parking Lot off I-80 immediately east of the Dunnfield Parking Lot. This is a very popular route and is usually very busy in pleasant weather. An alternative return route can be made by descending Mt. Tammany into the Dunnfield drainage and to the Dunnfield Lot via the Blue Blaze Trail. ~~This trail lies within both DWGNRA and Worthington State Forest.~~

Access & Facilities: Parking available at Red Dot Trailhead. Parking and restrooms available at Dunnfield Trailhead.

Improvements & Maintenance: The Appalachian Mountain Club, park staff and State Forest staff work cooperatively to maintain and manage the trail.

Alternative B: Appalachian Trail Network/Gap View Network

Description: Same as Alternative A

Alternative C: Appalachian Trail Network/Gap View Network

Description: Same as Alternative B

Page 41, change text to read:

WOODS ROAD TRAIL

Sussex County, New Jersey

Alternative A: Not included

Alternative B: Country Road Network

Description: This ~~3.1~~ 3.4 mile hiking, ~~biking~~ and cross country ski trail extends along an old road trace that lies about three quarters of the way up the northwest slope of the Kittatinny Ridge. It extends from Hemlock Pond and the Blue Mountain Lake Trail at the south to the ~~Farmers Trace~~ Appalachian Trail at the north. Buttermilk Falls and Silver Spray Falls Trails can be accessed by way of the Woods Road Trail. ~~This trail offers an important link to the recreational connection between the National Recreation Area and Stokes State Forest.~~

Access & Facilities: Parking available at Blue Mountain Lake and ~~Farmers Trace~~ Buttermilk Falls Trailheads.

Improvements & Maintenance: Old road trace would be ~~surfaced with crushed gravel.~~ cleared and drainage problems corrected. The primitive nature of the trail would be maintained. Improvements would be the minimum necessary to prevent resource damage and provide a safe walking surface.

Alternative C: Not included

TRAILS PRIORITY AND PHASING

ALTERNATIVE A: CONTINUATION OF CURRENT MANAGEMENT PRACTICES

Page 42, first paragraph, change text to read:

Because this alternative is based on the current ~~management~~ guidance of the GMP, there are no priorities established for future trail development in the park.

Page 42, last paragraph, last sentence, change text to read:

...Additionally, site specific analyses would be conducted to assess in detail, the environmental consequences of development of individual trails.

IMPACTS TO NATURAL RESOURCES

TOPOGRAPHIC FEATURES

Page 57, change text to read:

Alternative A: Continuation of Current Management Practices (No-action)

Generally, existing trails are located on old road traces or existing paths and have not resulted in alteration of the topography. Under this alternative, existing trails could be upgraded and new trails could be proposed, requiring cut and fill. Although Alternative A does not define an overall scope of trail development in the park, it is unlikely that upgrading existing trails or constructing new trails would result in major ~~There would be no alteration to the topographic features in the park.~~

Alternative B: Multiple Linking Networks (Proposed)

Minimal cutting and filling may be necessary for the upgrading of existing trails and the construction of new trails. The total amount of cut and fill proposed under this alternative is not likely to have a major ~~effect effect~~ on existing topography.

Alternative C: Independent Networks

Impacts to topographic features would be the same as those under Alternative B.

PRIME AND UNIQUE AGRICULTURAL LANDS

Page 58, third paragraph, change text to read:

DWGNRA contains approximately 3,000 acres of cropland. An analysis using data from the park's geographic information system (GIS) was performed to evaluate the amount of area, currently used as cropland, that would be affected by each alternative. The cropland coverage was derived from interpreted 1:12,000 black and white aerial photography that identifies fields that comprise the permitted agricultural leasing program. The results show trails and parking overlap permitted cropland under each alternative:

- Alternative A: 1.0 trail ~~miles~~ mile, 1 parking lot
- Alternative B: 4.7 trail miles, 3 parking lots
- Alternative C: 3.0 trail miles, 3 parking lots

Alternative A: Continuation of Current Management Practices (No-action)

One existing parking lot and 1.0 miles of existing trails encroach on agricultural lands. About 1.3 acres of prime agricultural land are affected. ~~There would be no new impacts to prime and unique farmland under this alternative.~~ Under this alternative, new trails in agricultural lands could be proposed. Because there would be no designated trail system and the overall scope of trail development in the park would not be defined, additional miles of trails developed in agricultural lands in the future, and potential impacts over time, cannot be predicted.

Alternative B: Multiple Linking Networks (Proposed)

Three parking lots and 4.7 miles of trails would encroach on agricultural lands. About 5.9 acres of prime agricultural lands would be affected. The loss of 5.9 acres out of 3,000 acres of agricultural land would be con-

sidered minor. Trail segments would be located along hedgerows, filter strips, and field edges to minimize the loss of cropland.

Alternative C: Independent Networks

Three parking lots and 3.0 miles of trails would encroach on agricultural lands. About 3.8 acres of prime agricultural lands would be affected. The loss of 3.8 acres out of 3,000 acres of agricultural land would be considered minor. Trail segments would be located along hedgerows, filter strips, and field edges to minimize the loss of cropland.

SOILS

Table 5, below, summarizes the results of a slope analysis for each of the alternatives. Slopes of 16-25% provide moderate limitations to development of trails. Higher slopes mean more severe limitations.

Page 59, change text to read:

Alternative A: Continuation of Current Management Practices (No-action)

About 5 miles out of 112 miles (5%) of existing trails ~~miles~~ occur on steep slopes (gradients greater than 25%). These are trail sections where limitations may be severe and the potential for soil erosion the highest. Under current management, eroded sections of trails are closed or rehabilitated. Under this alternative, new trails on steep slopes could be proposed. Because there would be no designated trail system and the overall scope of trail development in the park would not be defined, additional miles of trails devel-

Table 5: Miles of trails vs. slope for each alternative.

	00-03%	04-08%	09-15%	16-25%	26-70%	71-90%
Alternative A	37	36	23	10	5	0
Alternative B	71	76	46	22	9 8	0
Alternative C	60	58	35	17	8	0

oped on steep slopes in the future, and potential impacts over time, cannot be predicted.

Alternative B: Multiple Linking Networks (Proposed)

This alternative would almost double the ~~number~~ mileage of park trails but does not greatly increase the miles of trails on steep slopes. About 8 miles out of 223 miles (4%) of trails miles would be located on steep slopes. Many of the new trails would be located on existing roadbeds. Therefore, the additional effect on soils is expected to be minimal. Evaluating the likelihood and significance of potential adverse impacts would require further assessments specific to individual trails or groups of trails.

Alternative C: Independent Networks

This alternative proposes less trail mileage than Alternative B, yet the potential impacts may be similar. About 8 miles out of 178 miles (4%-5%) of trails miles would be located on steep slopes. Many of the new trails would be located on existing roadbeds. Therefore, the additional effect of soils is expected to be minimal. Evaluating the likelihood and significance of potential adverse impacts would require further assessments specific to individual trails or groups of trails.

FLOODPLAINS

Page 59, change text to read:

Alternative A: Continuation of Current Management Practices (No-action)

Some portions of approximately 11 trails are located in the 100 year floodplain. The portions of the trails in the floodplain could be relocated; however, the presence of these trail is not likely to have a significant an adverse effect on the floodplain. ~~They are not constructed in such a manner as to create a significant~~ Generally, existing trails are flush with the surrounding ground surface and do not create an obstruction or reduce the area of the floodplain. Potential effects on trails include periodic flooding and clean up. Under this alternative, new trails in floodplains could be proposed. Because there would be no designated trail system and the overall scope of trail development in the park would not be defined, additional miles of trails developed in floodplains in the future, and potential impacts over time, cannot be predicted.

Alternative B: Multiple Linking Networks (Proposed)

Some trails would be located in a floodplain in this alternative. The trails in the floodplain could be located elsewhere, but that would not pro-

vide the same experience that is available near the river. Trails in the floodplain would also provide a hiking opportunity on relatively level terrain, which ~~less mobile visitors could enjoy~~ would allow the development of universally accessible trails. The presence of these trails is not likely to have a ~~significant~~ an adverse effect on the floodplain because they are not constructed in such a manner as to create a significant obstruction or reduce the area of the floodplain.

Alternative C: Independent Networks

Impacts to floodplains will be the same as those under Alternative B.

WATER RESOURCES

Surface Waters, Streamflow, Water Quality

Page 60, change text to read:

Alternative A: Continuation of Current Management Practices (No-action)

Approximately 34 miles of trails and 12 parking lots are located within 150 feet of surface waters (includes wetlands and streams). There are approximately 76 stream crossings.

This alternative represents existing conditions. The present-day occurrence of significant impacts to surface waters has not been studied. Any impacts currently having an adverse effect on surface waters, streamflow or water quality would continue to be handled on an individual basis as they are discovered by park staff or cooperators. Any undiscovered impacts would likely continue.

Under this alternative, new trails that cross or are in close proximity to surface

waters could be proposed. Because there would be no designated trail system and the overall scope of trail development in the park would not be defined, additional miles of trails developed in the future that are in close proximity to surface waters or have stream crossings, and the potential impacts over time, cannot be predicted.

Page 60, Fourth paragraph, change text to read:

Rehabilitation of existing trails and development of new trails would not have a long-term adverse effect on surface waters, streamflow or water quality. As trails are rehabilitated or developed, trail design will incorporate measures that avoid and minimize adverse impacts, such as locating crossings at the narrowest point, sizing bridges and culverts to avoid constricting streamflow and using stable slope design and restoring the ground surface after construction to avoid long-term erosion problems. There is some potential for short-term impacts due to erosion and siltation during construction, but adverse impacts would be mitigated by implementation of an approved erosion and sedimentation control plan.

Alternative C: Independent Networks

Approximately 64 miles of trails and 26 parking lots would potentially be located within 150 feet of surface waters. The total number of stream crossings under Alternative C would be approximately 164. Approximately 13 miles of new trail construction would potentially occur

within 150 feet of surface waters and would require 9 new stream crossings. The remaining 155 crossings occur on present park trails and road traces that will be included in the designated trail system. The condition of these crossings is not known. As site-specific studies are done, many of these crossings are likely to require repair or replacement.

~~Impacts to~~ **Effects on** surface waters, streamflow and water quality as a result of implementing Alternative C would be the same as described for Alternative B.

Wetlands

Page 61, change text to read:

Alternative A: Continuation of Current Management Practices (No-action)

Continuation of Current Management Practices (No-action) The present-day occurrence of significant impacts to wetlands has not been studied. Any impacts currently having an adverse effect on wetlands would continue to be handled on an individual basis as they are discovered by park staff or cooperators. Undiscovered impacts would likely continue.

Under this alternative, new trails that cross or are in close proximity to wetlands could be proposed. All proposed trails would be designed to avoid and minimize impacts to wetlands in accordance with NPS policy. Therefore, no adverse effects to wetlands are anticipated under this alternative.

Alternative B: Multiple Linking Networks (Proposed) There would be minimal to no impact on wetlands. As

trails are proposed for upgrade or development, field surveys would be conducted to identify wetlands and the trail design would be revised to avoid these areas. If wetlands cannot be avoided, trail design would incorporate measures that minimize impacts such as crossing a wetland at the outermost edge and using boardwalk on pilings for all wetland crossings to maintain hydrologic flow and allow movement of wildlife.

Alternative C: Independent Networks Impacts to wetlands would be the same as described for Alternative B.

Groundwater

Page 61, change text to read:

Alternative A: Continuation of Current Management Practices (No-action)

The present-day occurrence of significant impacts on groundwater have not been ~~+~~ studied. Generally, existing trails and trailheads do not have wells or water supply systems. Under this alternative, it is unlikely that wells or water supply systems would be included in any new trails that may be proposed. Therefore, no adverse impacts to groundwater are anticipated.

FISH AND WILDLIFE

Page 61, change text to read:

Alternative A: Continuation of Current Management Practices (No-action)

The existing ~~444~~ 112 miles of trails may have a high level of concentrated use. The disturbance from human presence may already have an adverse effect ~~on~~ by displacing wildlife. Under this alternative,

future effects of trail development cannot be predicted because there would be no designated trail system and the overall scope of trail development in the park would not be defined.

Alternative B: Multiple Smaller Linking Networks (Proposed)

The construction of new trails may result in minor, short-term impacts on water quality in the immediate area of construction. Monitoring would ensure that water quality remained high and fishery habitats would continue to be enhanced. The overall adverse effect on the river corridor's fisheries would be negligible.

Page 62, fourth paragraph, change text to read:

The increased number of trails available for public use may result in less concentrated use of present park trails and potentially reduce the likelihood of existing disturbance to wildlife from trail use. The potential for adverse effects on wildlife may exist; however, we cannot predict the extent of the effect. There is also some potential that Alternative B may result in the least overall impact on wildlife because it results in the greatest dispersal of trail users.

Alternative C: Independent Networks

~~Impacts to fish and wildlife~~
~~Independent Networks~~ Effects on water quality and vegetation will be the same as those under Alternative B. The overall impact of Alternative C on wildlife may potentially be greater than Alternative B because, although Alternative C expands the number of trails available to users, the

focus of this alternative is directing and concentrating trail use within specific areas of the park. Concentrating trail use increases the potential for disturbance and overall impacts to wildlife.

VEGETATION AND NON NATIVE "EXOTIC" SPECIES

Page 62, change text to read:

Alternative A: Continuation of Current Management Practices (No-action)

~~This alternative would affect~~ Present park trails total about ~~444~~ 112 miles of trail, including 1.0 mile through existing cropland, 13 miles through old fields and thickets, and 98 miles through forest. Under this alternative, the potential for invasion by exotic plants and future effects on vegetation cannot be predicted because there would be no designated trail system and the overall scope of trail development in the park would not be defined.

The Appalachian National Scenic Trail encroaches on two occurrences of biologically significant native plant communities. Other trails skirt the edges of a total of five additional communities. Adverse effects from invasion by exotic plants has not been well studied. In addition, increased visitor presence in these areas could lead to adverse impacts from collecting or trampling of vegetation. Evaluating the likelihood and significance of potential adverse impacts would require further study and would be addressed by assessments specific to individual trails or groups of trails.

Alternative B: Multiple Linking Networks (Proposed)

This alternative

would effectt ~~224~~ 223 miles of trail, including five miles through croplands, 14 miles through old fields and thickets, and ~~205~~ 204 miles through forest. About ~~35~~ 34 miles of new trail would be cut, including ~~48~~ 26 miles of multi-use trail requiring heavy machinery and earth-disturbing activities.

Page 63, third paragraph, change text to read:

The Appalachian National Scenic Trail encroaches on two occurrences of biologically significant native plant communities. Other trails would skirt the edges of a total of nine additional communities. In addition to potential adverse effects from invasion by exotic plants, increased visitor presence in these areas could lead to adverse impacts from collecting or trampling of vegetation. Evaluating the likelihood and significance of potential adverse impacts would require further study and would be addressed by environmental assessments specific to individual trails or groups of trails.

Alternative C: Independent Networks

This alternative would affect about ~~484~~ 178 miles of trail, including three miles through croplands, nine miles through old fields and thickets, and ~~469~~ 166 miles through forest. About 26 miles of new trail would be cut, including 18 miles of multi-use trail requiring heavy machinery and earth-disturbing activities.

The Appalachian National Scenic Trail encroaches on two occurrences of biologically significant native plant communi-

ties. Other trails would skirt the edges of a total of eight additional communities. In addition to potential adverse effects from invasion by exotic plants, increased visitor presence in these areas could lead to adverse impacts from collecting or trampling of vegetation. Evaluating the likelihood and significance of potential adverse impacts would require further study and would be addressed by environmental assessments specific to individual trails or groups of trails.

The same mitigation measures would be used in Alternatives B & and C.

THREATENED OR ENDANGERED SPECIES

Bald Eagle

Page 64, change text to read:

The locations of important **wintering** eagle habitat in DWGNRA have been provided to USFWS and are used as the basis for identifying potential impacts to this species from construction and use of the proposed trails. The primary effect on **wintering** bald eagles would result from trail use and construction. Human activity within 400 meters of eagles can force them to abandon the immediate area, preventing them from foraging and/or causing unnecessary expenditure of energy. Repeated intrusions into their **wintering** habitat can result in physiologic stress at a time when cold weather and reduced foraging opportunities can weaken individuals, making them susceptible to disease, and can lower the reproductive success of adults.

Nesting eagles may be impacted by similar types of disturbance; e.g., construction, human disturbance, etc. Impacts are usually evaluated on a case-by-case basis and measures to protect nesting eagles would be developed as needed. ~~Informal~~ Consultation with USFWS will ensure that adverse impacts to the species will be avoided.

Alternative A: Continuation of Current Management Practices (No-Action)

Approximately 2.2 miles of existing trails lie within the 400 meter buffer surrounding important wintering eagle habitat. Historically, visitor use of these trails during the winter months has been light and no impact to the eagle population has been documented. The one exception is a portion of the existing snowmobile trail that may result in auditory disturbance of the species in an adjacent foraging area. Use of this trail by the intended user group has been light in recent years due to infrequent snowfalls, therefore the issue of disturbance has not been addressed. Under this alternative, existing trails would continue to be available to the public. Increased visitation with no provision for additional trails may result in increased use of trails within important eagle habitat. This increased use may negatively impact the species. Additionally, more consistent snowfalls may lead to regular use of the existing snowmobile trail resulting in increased disturbance of the species.

One pair of eagles made a nesting attempt in 1999. The nest failed for unknown reasons. It is not known if the pair will attempt to nest in the park in the

future. If so, the park will consult with USFWS on potential impacts and measures to protect the nest.

Alternative B: Multiple Linking Networks (Proposed)

This alternative includes the McDade Recreational Trail that runs the length of the park in Pennsylvania. Approximately 9.25 miles of this trail is within the 400 meter buffer zone surrounding important wintering eagle habitat. The park is working closely with USFWS to ensure that construction and use of this trail does not impact the wintering eagle population. To partially achieve this goal, the McDade Recreational Trail proposes to change a portion of the existing snowmobile trail to exclude motorized vehicles. This would alleviate any potential for auditory disturbance of **wintering** bald eagles in an adjacent foraging area by continued use of the trail by snowmobiles.

Page 65, paragraph two, change text to read:

The remaining trails proposed in Alternative B result in an approximately 0.42 mile increase over the existing (Alternative A) trail length within buffer areas surrounding important **wintering** eagle habitat. The increased number of trails available for public use would result in less concentrated use of present park trails and further reduce the likelihood of disturbance ~~to the species~~ **wintering** eagles from trail use.

One pair of eagles made a nesting attempt in 1999. The nest failed for unknown reasons. It is not known if the

pair will attempt to nest in the park in the future. If so, the park will consult with USFWS on potential impacts and measures to protect the nest.

In general, impacts to the species would be avoided by carefully aligning the trails to take advantage of existing vegetative and topographic screening; seasonal restrictions on construction activities; and, if necessary, seasonal closures of trail segments during critical periods.

Indiana bat

Page 65, paragraph two, change text to read:

Alternative A: Continuation of Current Management Practices (No-action) About 91 of ~~111~~ 112 miles of existing trails go through forest. Routine maintenance to remove hazard trees is scheduled to occur during months when Indiana bats would not be present. No maternity colonies are known within DWGNRA boundaries. Under this alternative, any proposed upgrades or new trail development would be done in consultation with USFWS to ensure no adverse effects on Indiana bats.

Alternative B: Multiple Linking Networks

(Proposed) A total of ~~224~~ 223 miles of trails would be designated. About 189 miles would utilize existing old roads, etc. and about ~~35~~ 34 miles of new trail would be cleared. Of the new trail, about 30 miles, or 17% of the total under this alternative, would traverse forest and could require the cutting of some trees suitable for roosting by Indiana bat. All trail development under this alternative would be done in consultation with USFWS to

ensure no adverse effects to Indiana bats.

Page 66, change text to read:

Alternative C: Independent Networks

A total of 178 miles of trails would be designated. About 152 miles would utilize existing old roads, etc. and about 26 miles of new trail would be cleared. Of the new trail, about 23 miles, or 13% of the total under this alternative, would traverse forest and could require the cutting of some trees suitable for roosting by Indiana bat. All trail development under this alternative would be done in consultation with USFWS to ensure no adverse effects on Indiana bats.

Small whorled pogonia

No populations of this species are currently known to exist in the park. However, field surveys have been limited and the second- or third-growth mixed forest habitat is widespread. A characteristic common to most small whorled pogonia sites is proximity to features, such as streams or logging roads, which create long-persisting breaks in the forest canopy. The use of old woods roads figures prominently in the development of the park's trail system.

To ensure that this species is unlikely to be adversely affected by development or use of the trail system, field surveys would be conducted to assess the presence or absence of small whorled pogonia wherever suitable habitat is found along proposed trails. If populations were to be documented, informal consultation with the U.S. Fish & Wildlife Service would be initiated.

IMPACTS TO CULTURAL RESOURCES

ARCHEOLOGICAL RESOURCES

Page 68, second paragraph, change text to read:

Management actions would be taken to prevent illegal collecting and may be taken to prevent damage from natural processes such as erosion. Protection may include construction of shelters over sites, features or specimens for interpretation in situ, stabilization in the field, or collection, preparation, and placement of specimens cultural material in museum collections. The localities and geologic settings of specimens such sites will be adequately documented when specimens-artifacts are collected or cultural features are excavated.

Protection may also include, where necessary, the salvage collection of threatened specimens that are scientifically archeological sites that are determined significant.

Alternative B: Multiple Linking Networks

(Proposed) This alternative largely utilizes existing road traces. Therefore, minimal to no impact on archeological resources is anticipated. Any new development would require further study and would be addressed by compliance specific to that trail or group of trails.

Generally, implementation of this alternative would increase use throughout the recreation area. This would result in increased potential for vandalism of outlying archaeological resources. However, the overall effect would be to increase the protection and preservation of archaeological resources by increasing knowledge and

awareness of sites. Any potential increase in vandalism may be mitigated by planting vegetative screening and educational programs.

Page 72, Totals, Table 9.

Alternative B: Multiple Linking Networks

This system is the most expansive of all three alternatives and includes a total of 223 224 miles of trails. These include 111 113 new

miles of trails including 95 98 miles of new biking trails and an additional 7 miles of trails open to horseback riders. The total economic impacts of the Alternative B expenditures are shown in Table 9 43.

Table 8. Estimated Number of Trail Visits for Alternative B.

	EXISTING TRAILS (ALTERNATIVE A)	NEW FOOT TRAILS TRAFFIC ONLY	NEW FOOT TRAFFIC AND BIKE TRAILS	NEW FOOT TRAFFIC AND HORSE TRAILS	TOTAL
Hikers	180,925	42,576	161,434	12,418	397,353
Bicyclists	3,500	0	161,434	0	164,934
Horse users	500	0	0	294	794
Total Users	184,925	42,576	322,868	12,712	563,081

Table 9. Estimated Trail Related Expenditures for Alternative B.

	CURRENT USE ALTERNATIVE A TRAILS	NEW FOOT TRAFFIC ONLY	NEW MULTIPLE USE TRAILS				
Expense Categories		Foot Users n=42,576	Foot Users n=173,852	Bikers N=161,434	Horse n=294	New Trails Subtotal	Total Expenditures
Food	\$	\$	\$	\$	\$	\$	\$
Restaurants	480,952.25	109,420.32	446,799.64	671,565.44	832.02	1,228,617.42	1,709,569.67
Other F&B	286,380.25	65,141.28	265,993.56	401,970.66	499.80	733,605.30	1,019,985.55
Food Total	767,332.50	174,561.60	712,793.20	1,073,536.10	1,331.82	1,962,222.72	2,729,555.22
Lodging							
Hotel/Motel	200,234.75	45,556.32	186,021.64	279,280.82	346.92	511,205.70	711,440.45
Camping	46,766.25	10,644.00	43,463.00	64,573.60	79.38	118,759.98	165,526.23
Lodging Total	247,001.00	56,200.32	229,484.64	343,854.42	426.30	629,965.68	876,966.68
Transportation	512,784.50	116,658.24	476,354.48	716,766.96	887.88	1,310,667.56	1,823,452.06
Retail Purchases	374,295.00	85,152.00	347,704.00	523,046.16	649.74	956,551.90	1,330,846.90
Attractions & Entertainment	86,030.50	19,584.96	79,971.92	117,846.82	147.00	217,550.70	303,581.20
Other	149,730.00	34,060.80	139,081.60	209,864.20	258.72	383,265.32	532,995.32
Total	2,137,173.50	486,217.92	1,985,389.84	2,984,914.66	3,701.46	5,460,223.88	7,597,397.00

CHAPTER 4: CUMULATIVE EFFECTS

(addition to Chapter 4)

CUMULATIVE EFFECTS

Cumulative effects are the combined effects of individual minor actions on the same resource over a period of time. The evaluation of cumulative effects considers the effects of the proposed federal action added to other past, present and reasonably foreseeable future actions, including those of non-federal agencies and persons.

Within DWGNRA, the effects discussed in Chapter 4 include cumulative effects because the effect on each resource was evaluated on a parkwide basis, over time, under each alternative. To summarize:

We do not anticipate cumulative effects on topography, wetlands, or groundwater under any of the alternatives.

Under Alternative A, there is potential for adverse cumulative effects over time to agricultural lands, soils, floodplains, surface waters and water quality, vegetation, invasion of exotic species, cultural landscapes, archeological resources, inholdings and road restrictions. Under Alternatives B and C, there is little potential for adverse cumulative effects to these resources, with the exception of invasion of exotic species. There is some potential for adverse cumulative effects from exotic species under Alternatives B and C. There is also potential for beneficial cumulative effects due to clearing and control.

Under all three alternatives, there is potential for adverse cumulative effects on fish and wildlife due to human disturbance. However, under Alternatives B and C, there is potential for cumulative benefit by dispersing use. Alternative B would provide the greatest potential benefit.

Under Alternative A, there is potential for adverse cumulative effects on threatened and endangered species due to concentrated use and continued use of informal trails. Under Alternatives B and C, there is little or no potential for adverse cumulative effects on these species due to consultation with US Fish and Wildlife Service and mitigation for all upgrades and new development. There is also potential beneficial cumulative effect under Alternatives B and C due to directing use away from informal trails.

Under Alternative A, there is potential for beneficial cumulative effect on the local economy due to increased trail use proportional to a general increase in visitation over time. Under Alternatives B and C, there is higher potential for beneficial cumulative effect due to the number and variety of trails that would accommodate increased users and which may encourage users to stay more than one day. Alternative B would provide the greatest potential benefit.

Evaluating cumulative effects of park actions when added to actions occurring

on adjacent lands is difficult. The park does not have information on the degree to which specific resources have been impacted on lands outside the park boundary. Surrounding DWGNRA is a wide variety of rural residential development, high-density residential development, commercial development, some light industrial, concentrated recreational facilities such as resorts and ski areas, and non-federal public lands such as state parks and state forests. Impacts to natural and cultural resources on lands surrounding DWGNRA are controlled to varying degrees by state and local regulations. Generally, however, there are fewer restrictions on development of non-federal property, especially privately owned land, than on federal property. Under Alternative A, there is potential for adverse cumulative effect on resources when trail-related actions in the park are added to the impacts of actions occurring outside the park. Under Alternatives B and C, the potential for adverse cumulative effects on resources within the park is generally minimal, which reduces the potential for adverse cumulative effects on resources when park actions are added to actions occurring outside the park. Under Alternatives A and B, there is potential beneficial cumulative effect due to connecting trails developed within the park to trails developed adjacent to the park. Alternative C does not provide this benefit.

SUMMARY OF EFFECTS BY ALTERNATIVE

RESOURCE	ALTERNATIVE A	ALTERNATIVE B	ALTERNATIVE C
Topographic features	No major alteration	No major effect Minimal cut & fill	No major effect Minimal cut & fill
Prime & Unique Agricultural Lands	1.3 acres affected New trails that affect agricultural lands could be proposed Future impacts not predictable	5.9 acres affects No major effect	3.8 acres affected No major effect
Soils (erosion potential measured as slopes greater than 25%)	5 miles of trail Eroded sections closed or rehabilitated New trails that affect steep slopes could be proposed Future impacts not predictable	8 miles of trail New trails miles primarily on existing roads Minimal effect on soils	8 miles of trail New trail miles on existing roads Minimal effect on soils
Floodplains	Portions of existing trails in floodplains No major effects Trails may be flooded periodically and need clean up New trails in floodplains could be proposed Future impacts not predictable	Some trails in floodplains No major effect Trails not usable when flooded and may require clean up or repair.	Same as Alternative B
Surface Waters, Streamflow, Water Quality (potential effects measured as location within 150 feet of mapped resources and number of stream crossings)	34 miles of trail 12 parking lots 76 stream crossings Existing adverse effects handled individually as discovered Undiscovered effects that currently exist may continue New trails that affect surface waters could be proposed Future impacts not predictable	76 miles of trails 30 parking lots 179 stream crossings that use existing trails & road traces 16 new stream crossings Possible short-term effects due to construction; mitigate by implementing erosion and sedimentation controls No major long-term effects. Mitigate with proper design, engineering and restoration.	64 miles of trails 26 parking lots 155 stream crossings that use existing trails & road traces 9 new stream crossings Potential effects and mitigation same as Alternative B

SUMMARY OF EFFECTS BY ALTERNATIVE

RESOURCE	ALTERNATIVE A	ALTERNATIVE B	ALTERNATIVE C
Wetlands	<p>Existing adverse effects are handled individually as discovered</p> <p>Undiscovered effects that currently exist may continue</p> <p>New trails that cross or are close to wetlands could be proposed; mitigate by designing to avoid and minimize impacts.</p> <p>No adverse effects</p>	<p>Minimal to no effect</p> <p><i>Field surveys conducted for all upgrades and new trails</i></p> <p>Design revised to avoid and minimize impacts</p>	Same as Alternative B
Groundwater	No adverse effects	No adverse effects	No adverse effects
Fish and Wildlife	<p>Possible existing adverse effects due to human presence from concentrated use</p> <p>New trails could be proposed that may increase impacts or may help reduce impacts by dispersing use</p> <p>Future impacts not predictable</p>	<p>Potential exists for adverse effects due to human presence but extent not predictable</p> <p>Potential for least overall impact due to human presence by providing greatest dispersal of users</p> <p>Possible short-term impacts during construction; mitigate impacts to water habitats by proper erosion & sediment controls and monitoring</p> <p>Negligible loss of habitat and displacement of wildlife due to construction</p> <p>Mitigate by vegetation management to ensure habitat diversity</p>	Same as Alternative B
Vegetation and Non-Native "Exotic" Species	<p>1 mile in cropland 13 miles in old fields & thickets 98 miles through forest</p> <p>The AT encroaches on 2 important native plant communities</p> <p>Other trails may encroach on 5 additional important native plant communities</p>	<p>5 miles in cropland 14 miles in old fields & thickets 204 miles in forest 34 miles of new trail</p> <p>The AT encroaches on 2 important native plant communities</p>	<p>3 miles in cropland 9 miles in old fields & thickets 166 miles in forest 26 miles of new trail</p> <p>The AT encroaches on 2 important native plant communities</p>

SUMMARY OF EFFECTS BY ALTERNATIVE

RESOURCE	ALTERNATIVE A	ALTERNATIVE B	ALTERNATIVE C
Vegetation and Non-Native "Exotic" Species continued	<p>Other trails may encroach on 5 additional important native plant communities</p> <p>New trails could be proposed</p> <p>Future effects due to invasion by exotic species not predictable</p> <p>Effects of exotic species on important native plant communities not well known</p> <p>Potential for adverse effects on important native plant communities due to increased use</p> <p>Would require further study and be addressed by trail-specific assessments</p>	<p>Other trails may encroach on 9 additional important native plant communities</p> <p>Potential adverse effects from invasion by exotic species due to construction; mitigate by minimizing earth disturbance and restoring disturbed soils with native species</p> <p>Potential beneficial effects from vegetation clearing for proposed trails by removing exotic species and controlling further invasion</p> <p>Potential for adverse effects to important native plant communities due to invasion of exotic species and increased use</p> <p>Would require further study and would be addressed by trail-specific environmental assessments</p>	<p>Other trails may encroach on 8 additional important native plant communities</p> <p>Potential effects same as Alternative B</p> <p>Would require further study and would be addressed by trail-specific environmental assessments</p>
Threatened or Endangered Species:	<u>Wintering</u>	<u>Wintering</u>	<u>Wintering</u>
Bald Eagle	<p>2.2 miles of trail in 400 meter buffer</p> <p>No major effect</p> <p>Potential adverse effects from portion of existing snowmobile trail within the buffer; not addressed because use has been light due to insufficient snowfall</p> <p>Potential adverse effects due to increased use on existing trails within buffer</p> <p><u>Nesting</u></p> <p>Nesting attempt in 1999; failed for unknown reasons</p> <p>Future nesting attempts may occur</p> <p>Consultation with US Fish & Wildlife Service would ensure no adverse impacts</p>	<p>11.9 miles of trail in 400 meter buffer</p> <p>Consultation with US Fish & Wildlife Service to ensure no adverse impacts</p> <p>Reduction in potential for adverse effects by relocating snowmobile trail out of buffer and by dispersing users more widely</p> <p><u>Nesting</u></p> <p>Same as Alternative A</p> <p>Mitigation measures for both wintering and nesting include locating trails behind vegetative screening, seasonal restrictions on construction, and possibly seasonal closures during critical periods</p>	<p>10.6 miles of trails in 400 meter buffer</p> <p><u>Nesting</u></p> <p>Same as Alternative A</p> <p>Consultation and potential reduction in effects same as Alternative B</p>

SUMMARY OF EFFECTS BY ALTERNATIVE

RESOURCE	ALTERNATIVE A	ALTERNATIVE B	ALTERNATIVE C
Threatened or Endangered Species:	1 trail crosses a wetland that may support bog turtles	2 trails skirt wetlands that may support bog turtles	2 trails skirt wetlands that may support bog turtles
Bog Turtle	6 trails skirt wetlands that contain suitable habitat	12 trails skirt wetlands that contain suitable habitat Consultation with US Fish & Wildlife Service would ensure no adverse impacts Mitigation measures include realigning trails to avoid wetlands and installing fences, vegetation and other barriers to exclude users from bog turtle habitat	11 trails skirt wetlands that contain suitable habitat Consultation and mitigation measures same as Alternative B
Threatened or Endangered Species:	No populations currently known <i>Non-emergency tree removal done during months when bats would not be present</i> New trails could be proposed; consultation with US Fish & Wildlife Service would ensure no adverse impacts	30 miles of new trails in forest would require some tree removal Consultation with US Fish & Wildlife would ensure no adverse impacts Mitigation measures include reducing tree removal to minimum necessary and removing trees during months when bats would not be present	23 miles of new trails in forest would require some tree removal Consultation and mitigation same as Alternative B
Indiana Bat			
Threatened or Endangered Species:	No populations currently known New trails or upgrades could be proposed; potential effects would be addressed by site specific studies and trail-specific environmental assessments Consultation with US Fish & Wildlife would ensure no adverse impacts	Potential effects due to trail development and upgrades would be addressed by site specific studies and trail-specific environmental assessments Consultation with US Fish & Wildlife would ensure no adverse impacts	Same as Alternative B
Small Whorled Pogonia and Northeastern Bulrush			

SUMMARY OF EFFECTS BY ALTERNATIVE

RESOURCE	ALTERNATIVE A	ALTERNATIVE B	ALTERNATIVE C
Cultural Landscapes	<p>Potential adverse effects due to use of informal trails</p> <p>New trails could be proposed; potential effects due to trail development and upgrades would be addressed by site specific studies and trail-specific environmental assessments; consultation under Section 106 would ensure no new adverse impacts</p>	<p>No effect where trails utilize existing circulation patterns</p> <p>Potential adverse effects due to widening, regrading, changing alignment or circulation patterns</p> <p>Potential beneficial effects due to reduction in use of existing informal trails</p> <p>Potential effects due to trail development and upgrades would be addressed by site specific studies and trail-specific environmental assessments</p> <p>Consultation under Section 106 would ensure no adverse impacts</p> <p>Mitigation measures include using existing roads and circulation patterns, designing trail & features to be compatible with the landscape, preserve characteristic vegetation, avoid use of non-characteristic ornamental plants, identify changes to distinguish from existing cultural features</p>	<p>Same as Alternative B</p>
Archeological Resources	<p>Loss of resources may be occurring due to less emphasis on education and vandalism.</p>	<p>Potential adverse effects from vandalism due to increased use</p> <p>Potential beneficial effects due to reduction in use of existing informal trails and increased emphasis on education</p> <p>Potential effects due to trail development and upgrades would be addressed by site specific studies and trail-specific environmental assessments</p> <p>Consultation under Section 106 would ensure no adverse impacts</p> <p>Mitigation measures include using existing roads, redesigning to avoid sensitive sites, planting vegetative screening, retrieving and preserving recovered artifacts.</p>	<p>Same as Alternative B</p>

SUMMARY OF EFFECTS BY ALTERNATIVE

RESOURCE	ALTERNATIVE A	ALTERNATIVE B	ALTERNATIVE C
Inholdings	<p>4 existing trails connect with non-NPS land</p> <p>Any current impacts would continue</p>	<p>Trails would cross 12 privately-owned parcels: 2 parcels currently have trails and NPS is purchasing 4 other parcels</p> <p>Trails would cross 21 non-NPS public parcels: 8 currently have trails</p> <p>Agreements with owners of remaining parcels would be sought</p>	<p>Trails would cross 5 privately owned parcels: 2 currently have trails</p> <p>Trails would cross 11 non-NPS public parcels: 9 currently have trails</p> <p>Agreements with owners of remaining parcels would be sought</p>
Road Closures	<p>Current restrictions and closures would continue</p> <p>New trails could be proposed, requiring additional restrictions and closures in the future</p>	<p>Conashaugh Road would be closed to vehicular traffic, including the section that connects to Long Meadow Road</p> <p>The access road to the Zimmermann property would be converted to trail use; if Zimmermann property was opened to the public, alternate access would have to be developed</p> <p>Big Egypt Road would become part of a trail system, requiring shared use of bicycles, hikers, and motor vehicles; the road is not plowed in winter and would be open to snowmobiles</p> <p>Mountain Road would be open to equestrian use, requiring shared use with motor vehicles</p> <p>Upper Ridge Road would be incorporated into the Country Road Trail, requiring closure of Upper Ridge Road to equestrian use; compensated by opening Mountain Road to equestrian use</p> <p>On all trails having shared use with motor vehicles, speed restrictions and other measures would be implemented</p>	<p>Conashaugh Road would be closed to vehicular traffic, including the section that connects to Long Meadow Road</p> <p>The access road to the Zimmermann property would be converted to trail use; if Zimmermann property was opened to the public, alternate access would have to be developed</p> <p>Big Egypt Road would become part of a trail system, requiring shared use of bicycles, hikers, and motor vehicles; the road is not plowed in winter and would be open to snowmobiles</p> <p>On all trails having shared use with motor vehicles, speed restrictions and other measures would be implemented</p>
Economic Effects	<p>Estimated trail users: 184,925</p> <p>Estimated total dollars entering local economy (direct & indirect): \$2,137,174</p>	<p>Estimated trail users: 563,071</p> <p>Estimated total dollars entering local economy (direct & indirect): \$7,597,327</p>	<p>Estimated trail users: 417,374</p> <p>Estimated total dollars entering local economy (direct & indirect): \$5,480,933</p>

CHAPTER 5: CONSULTATION AND COORDINATION

*Addition to Consultation and Coordination
Page 77, replaces last paragraph*

Public Review of Draft

Over 450 copies of the Draft Trails Plan/GMPA/EIS were distributed to agencies, organizations and individuals in July 1999 and was followed by a 90-day public review and comment period. In addition, the document was available on the park's website and in all public libraries adjacent to the park.

Three public workshops were held in August 1999 in Oxford (NJ), Bushkill (PA) and Matamoras (PA) to explain the information contained in the draft plan and solicit comments. An additional public workshop was held in September 1999 in Bushkill (PA). The public was informed of the meeting locations and times through letters, the federal register and notices published in local media outlets. Approximately 150 people attended the four meetings.

Public comments were received by a variety of methods. At the public meetings, individuals were invited to discuss the draft plan with NPS staff and submit comments on comment forms. These comment forms could also be filled out and mailed back to the park at a later time. Individuals could also write their ideas

and comments on separate flip charts set up as comment boards. A summary of these comments is included on page 29.

COMPLIANCE REQUIREMENTS

Page 78

FUTURE NEPA ACTIONS

As individual trails are **proposed for upgrade or ~~developed~~ development**, and where environmental assessments are necessary, **all required site-specific studies would be done and** a determination would be made concerning the environmental consequences of a proposed action. If no significant adverse effects are identified, a Finding of No Significant Impact (FONSI) may be prepared and appended to the GMP. If the proposed trail is found to have potential for significant impact, the trail would be re-designed to avoid and minimize the impact. Alternatively, an EIS may be prepared which would document the potential ~~adverse~~ impact in a Record of Decision (ROD). The FONSI or ROD would conclude the compliance process for the National Environmental Policy Act for the involved actions.

Appendix C contains a partial listing of laws, regulations and policies that pertain to the planning process.

CULTURAL RESOURCES

Potential impacts on the park's cultural resources will be addressed under the provisions for assessing effects outlined in 36 CFR Part 800, regulations issued by the Advisory Council on Historic Preservation (ACHP) implementing section 106 of the National Historic Preservation Act of 1966, as amended (NHPA; 16 USC 470 et

seq.) Under the "Criteria of Effect" (36 CFR Part 800.9(a), federal undertakings are considered to have an effect when they alter the character, integrity, use of cultural resource, or the qualities that qualify a property for listing in the National Register of Historic Places.

The NPS will consult with the respective Pennsylvania and New Jersey State Historic Preservation Officers (SHPO) and the ACHP to ensure that NPS operations, management and administration provide for the site's cultural resources in accordance with the intent of NPS policies and with sections 106, 110, and 111 of the NHPA, as stated in the 1995 Programmatic Agreement (PA) among the NPS, the ACHP and the National Conference of State Historic Preservation Officers. Under section V.A. of the programmatic agreement, all undertakings that are not considered programmatic exclusions would be reviewed in accordance with 36 CFR Part 800.

Internally, the NPS will complete an "Assessment of Actions Having an Effect on Cultural Resources" (XXX form) prior to implementation of any proposed action. The form would document any projected effects and outline actions proposed to mitigate any effects. All implementing actions for cultural resources will be reviewed using the XXX form and reviewed by the park's team of cultural resource advisors as specified in the 1995 PA.

Before any ground-disturbing action by

the NPS, the park's archeologist will determine the need for archeological inventory or testing. Any such studies will be carried out and evaluated for effect before construction, in consultation with the state historic preservation officer, and the ACHP.

Letters were sent to Pennsylvania and New Jersey SHPOs and the ACHP in February 1998 notifying them of the park's intention to pursue a GMPA and EIS.

NATURAL RESOURCES

In the Commonwealth of Pennsylvania, natural resource compliance is coordinated with the U.S. Corps of Engineers, Pennsylvania Department of Environmental Protection (DEP) and in the State of New Jersey, the New Jersey Department of Environmental Protection. During the NEPA compliance process, consultation with the respective DEPs will ensure compliance with all state air and water quality standards. Any actions in floodplains or wetlands in the park will comply with Executive Orders 11988 and 11990 (floodplain management and wetlands protection). Any necessary approvals or permits from the states or other federal agencies will be obtained prior to action.

The NPS will consult with the U.S. Fish and Wildlife Service (USFWS) to avoid or mitigate adverse effects to endangered and threatened species and critical habitat. A letter was sent to the USFWS in February 1998 notifying them of the park's decision to pursue a GMPA and EIS.

Page 101, insert text

"Universal Access" published by PLAE, Inc. of Berkeley, CA, 1994, Library of Congress Catalog Number 93-092806

Trails for the 21st Century, Planning, Design, and Management Manual for Multi-Use Trails, 1993, Rails-to-Trails Conservancy, Island Press

"Standards for Accessible Design" ADA Accessibility Guidelines (ADAAG), 1991 Published in the Federal Register by the Department of Justice, July 26 1991

Conflicts on Multiple- Use Trails, USDOT-Federal Highway Administration and the National Recreational Trails Advisory Committee, 1994 Publication No. FHWA-PD-94-031

NPS Trails Management Handbook, By Lennon Hooper, Denver Service Center, NPS 2023

Trails and Walks Inventory/ Maintenance Guide, USDI-NPS By Lennon Hooper, August 1981

NATIONAL PARK SERVICE TEAM AND CONTRIBUTORS

DELAWARE WATER GAP NATIONAL RECREATION AREA

William Laitner, Superintendent
Dave Herrera, Assistant Superintendent
Bob Kirby, Assistant Superintendent
Elizabeth Johnson, Chief of Natural Resources (former)
Dennis McGinnis, Chief of Maintenance (former)
Doyle Nelson, Chief Ranger
Randy Turner, Chief of Visitor Services and Cultural Resources (former)

Allan Ambler, Biologist
Cindy Braanley, Office Automation Clerk
Brad Clawson, NJ Operations Supervisor
Kathy Commisso, Secretary
Larry Commisso, Resource Management Ranger
Bob Geis, Roads & Trails Facilities Manager
Keith High, GIS Specialist
Cynthia Hunter, Civil Engineer
Jacki Katzmire, Natural Resource Specialist
Jennifer Kavanaugh, Pennsylvania Ranger
Sue Kopezynski, Historian
Chris Nelson, Superintendent's Secretary
Zehra Osman, Community Planner
Jeff Shreiner, Biologist
Tom Solon, Historical Architect
Barry Sullivan, New Jersey District Ranger (former)
Wayne Valentine, New Jersey District Ranger
Ed Whitaker, Pennsylvania District Ranger
John Wright, Archeologist

PHILADELPHIA SUPPORT OFFICE-STEWARDSHIP & PARTNERSHIPS

Mark Alexander, Landscape Architect
James Farrell, Visual Production Specialist
Deirdre Gibson, Park Planning Program Manager
Helen Mahan-Forester, Community Planner and Project Leader
Cynthia Wilkerson, Environmental Protection Specialist

CONSULTANTS (ECONOMIC ANALYSIS)

Alan Graefe, Pennsylvania State University
Arun Upneja, Pennsylvania State University
Hans Vogelsong, Pennsylvania State University
Roger Moore, North Carolina State University

LIST OF RECIPIENTS

New Jersey Congressional Delegation

Senator Frank Lautenberg
Senator Robert Torricelli
Congresswoman Marge Roukema

Pennsylvania Congressional Delegation

Senator Rick Santorum
Senator Arlen Specter
Congressman Pat Toomey
Congressman Don Sherwood

FEDERAL AGENCIES

U.S. Department of the Interior
Appalachian Trail Park Office
Delaware & Lehigh Canal National Heritage Corridor/State Park
Upper Delaware National Scenic & Recreational River
U.S. Fish and Wildlife Service
U.S. Geological Survey
U.S. Army Corps of Engineers
Advisory Council on Historic Preservation
U.S. Department of Agriculture
U.S. Forest Service
National Resources Conservation Service

New Jersey State Agencies

Governor's Office
State Historic Preservation Office
Department of Environmental Protection
High Point State Park
Stokes State Forest
Worthington State Forest
Wildlife Management Areas
Walpack
Department of Transportation

Pennsylvania State Agencies

Governor's Office
State Historic Preservation Office
Department of Environmental Protection
Department of Conservation and Natural Resources
Game Commission
Delaware State Forest
Fish & Boat Commission
Department of Transportation

ADJACENT MUNICIPALITIES

New Jersey

Sussex County
Frankford Township
Hampton Township
Montague Township
Sandyston Township
Stillwater Township
Walpack Township
Warren County

Blairstown Township
Hardwick Township
Knowlton Township

PENNSYLVANIA

Monroe County
Borough of East Stroudsburg
Borough of Stroudsburg
Delaware Water Gap Borough
Middle Smithfield township
Smithfield Township
Stroud Township
Northampton County
Upper Mount Bethel Township
Pike County
City of Matamoras
Delaware Township
Dingman Township
Lehman Township
Milford Borough
Milford Township
Westfall Township

PARTNERSHIP AGENCIES AND ORGANIZATIONS

American Youth Hostel
Appalachian Mountain Club
Appalachian Trail Conference
Delaware Highlands Conservancy
Delaware River Basin Commission
Delaware Water Gap NRA Citizens Advisory Commission
Delaware Water Gap Equestrian Advisory Committee
Eastern National Association
Economic Development Council of Northeast Pennsylvania
Friends of Delaware Water Gap National Recreation Area
Kittitany Mountain Bike Association
Montague Association for the Restoration of Community History
Minisink Valley Historical Society
Monroe Historical Association
NJ-NY Trail Conference
PA State Snowmobilers Association
Pennsylvania Rails-to-Trails Conservancy
Pike County Chamber of Commerce
Pike County Historical Society
Pocono Environmental Education Center
Pocono Mountain Vacation Bureau
Skylands of NJ Tourism Council
The Nature Conservancy
Upper Delaware Citizens Advisory Council
Upper Delaware Council
Walpack Historical Society
Walpack Valley Environmental Education Center

UNIVERSITIES

East Stroudsburg University
New York University
North Carolina State University
Pennsylvania State University

APPENDIX B: TRAILHEAD/PARKING AREA COST ESTIMATES

The need for restrooms at a trailhead was determined based on an analysis of parking spaces, the current volume of use per trail, and an estimate of the potential for increased use through development of a trail. The potential for increased use is quantified by: plans for expanding or upgrading a parking lot; a new trail providing a connection to other high use areas or completing a loop; the amount of time a trail user spends on a given trail and the resulting frequency a facility provides per visit; and, significant resources that would be protected by providing a restroom. In general, for parking areas with less than 10 cars, no additional comfort facilities were planned. For parking areas with greater than 10 and less than 20 spaces, 2 toilet fixtures would be provided, one for each sex. For parking areas serving greater than 20 cars, a minimum of 4 toilet fixtures may be provided.

Water based, conventional septic tank and leachfield systems will be the first priority wherever economical and where the soils permit. When this option fails, alternate systems will be considered. The types of rest-

room services vary, depending upon such factors as locality, climate, topography, local soils, and accessibility. Federal guidelines and research documents, such as NPS-83, Guidelines for the Selection of a Toilet Facility, Remote Waste Management, In Depth Design and Maintenance for Vault Toilets, and, Composting Toilet Systems, Planning, Design, and Maintenance will be utilized in the selection of an appropriate wastewater treatment and disposal system specific to each remote site. Portable chemical toilets are inexpensive alternatives for areas with access for pumping and seasonal use. These toilets are often not well received by the public, inspire vandalism and, per NPS-83 are not recommended for use in a permanent installation. Vault toilets are typically low cost to construct, are not unduly limited by the numbers of visitors that can be served and are suggested for use in areas that are accessible to pumping service vehicles. However, vault toilets can create odor problems where wind is limited, air inversions occur or where convection currents from the

solar heat gain is limited. Electric fans can be an alternative to assist in evacuating the restroom, but odors can still accumulate just outside the vent and therefore, just outside the building. Maintenance is also a chore as disgruntled visitors often resort to throwing items down the fixture that can not be pumped. Composting toilets are suitable for remote areas where pumping is not an option. These fixtures are not recommended for conditions where visitation is greater than 75 visitors per day per toilet. They often require a lot of attention, continual addition of wood chips and aerating the compost, draining excess liquids etc.

Selection of restroom facilities for the trailheads demonstrating upgrades of comfort stations or construction of a new facility was made on the above criteria. Best design and construction practices will be incorporated to protect public health while reducing capital investment and minimize maintenance labor and replacement costs at each trailhead.

TRAIL HEAD NAME	ALTERNATIVE A EXISTING CONDITIONS			ALTERNATIVE B PROPOSED				ALTERNATIVE C PROPOSED			
	SURFACE TYPE	PARKING SPACES	COMFORT STATION	SURFACE TYPE	PARKING SPACES	COMFORT STATION	COST	SURFACE TYPE	PARKING SPACES	COMFORT STATION	COST
ADA	DIRT	6		GRAVEL	6		\$4,660	GRAVEL	6		\$4,660
ADAMS CREEK	DIRT	8		GRAVEL	8		\$6,660	GRAVEL	8		\$6,660
AMC LOT	GRAVEL	30		GRAVEL	30		\$7,200	GRAVEL	30		\$7,200
ARROW ISLAND	ASPHALT	18		ASPHALT	18	CHEMICAL	\$10,400	ASPHALT	18	CHEMICAL	\$10,400
BLUE MOUNTAIN LAKE	GRAVEL	20	CHEMICAL	GRAVEL	20		\$5,700	GRAVEL	20		\$5,700
BLUE MOUNTAIN ROAD	DIRT	12		GRAVEL	12		\$16,3400	GRAVEL	12		\$16,340
BRIDE AND GROOM	DIRT	3		GRAVEL	3		\$2,330	GRAVEL	3		\$2,330
BUCK LOT	DIRT	4		GRAVEL	10	CHEMICAL	\$12,650				
BUSHKILL LAUNCH	ASPHALT	25	COMPOST	ASPHALT	25		\$2,700	ASPHALT	25		\$2,700
BUSHKILL VISITOR CENTER	GRAVEL	40	WATER	GRAVEL	40		\$4,300	GRAVEL	40		\$4,300
BUTTERMILK FALLS	GRAVEL	40	CHEMICAL	GRAVEL	20		\$5,700	GRAVEL	20		\$5,700
CAMP ROAD	DIRT	3	NOT ALTA	GRAVEL	3		\$2,330	GRAVEL	3		\$2,330
CHILDS PARK	GRAVEL	55	COMPOST	GRAVEL	25		\$9,150	GRAVEL	25		\$9,150
CONASHAUGH	GRAVEL	25	CHEMICAL	GRAVEL	25		\$6,450	GRAVEL	25		\$6,450
COPPERMINE	DIRT	20	CHEMICAL	GRAVEL	20		\$12,600	GRAVEL	20		\$12,600
CRATER LAKE	GRAVEL	20		GRAVEL	20	COMPOST	\$48,500	GRAVEL	20	COMPOST	\$48,500
DINGMANS FALLS	ASPHALT	30	CHEMICAL	ASPHALT	30		\$2,700	ASPHALT	30	COMPOST	\$2,700
DINGMANS LAUNCH	ASPHALT	80	WATER	ASPHALT	80		\$2,700	ASPHALT	80		\$2,700
DONKEY CORNER	DIRT	2		ASPHALT	2		\$1,820				
DUCK POND	ASPHALT	12	VAULT	ASPHALT	12		\$2,700	ASPHALT	12		\$2,700
DUNNFIELD	ASPHALT	30	YES	ASPHALT	12		\$5,400	ASPHALT	12		\$2,700
ESHBACK	DIRT	20		GRAVEL	20	COMPOST	\$57,000	GRAVEL	20	COMPOST	\$57,600

APPENDIX B: TRAILHEAD/PARKING AREA COST ESTIMATES

TRAIL NAME	ALTERNATIVE A EXISTING CONDITION			ALTERNATIVE B PROPOSED				ALTERNATIVE C PROPOSED			
	SURFACE TYPE	PARKING SPACES	COMFORT STATION	SURFACE TYPE	PARKING SPACES	COMFORT STATION	COST	SURFACE TYPE	PARKING SPACES	COMFORT STATION	COST
FARMERS TRACE	DIRT	4		GRAVEL	4		\$2,840				
HACKERS FALLS	GRAVEL	10		GRAVEL	10	CHEMICAL	\$7,700	GRAVEL	10	CHEMICAL	\$7,700
HAMILTON	GRAVEL	5		GRAVEL	8		\$5,750	GRAVEL	8		\$5,750
HIALEAH	GRAVEL	20	VAULT	GRAVEL	25	COMPOST	\$90,150	GRAVEL	25	COMPOST	\$90,150
HIDDEN LAKE	ASPHALT	20	CHEMICAL	GRAVEL	20		\$8,400	GRAVEL	20		\$8,400
HORNBECKS	GRAVEL	4		GRAVEL	4		\$2,840	GRAVEL	4		\$2,840
JAGER ROAD	DIRT	10		GRAVEL	10	CHEMICAL	\$12,650	GRAVEL	10	CHEMICAL	\$12,650
KAISER	GRAVEL	20		GRAVEL	20	CHEMICAL	\$10,700	GRAVEL	20	CHEMICAL	\$10,700
KARAMAC	GRAVEL	15		GRAVEL	15	CHEMICAL	\$9,950	GRAVEL	15	CHEMICAL	\$9,950
LENAPE	GRAVEL	25	CHEMICAL	GRAVEL	25		\$6,450	GRAVEL	25		\$6,450
LOCH LOMOND	GRAVEL	12	CHEMICAL	GRAVEL	12		\$4,500				
LOWER ESHBACK	GRAVEL	10	COMPOST	GRAVEL	10		\$4,200	GRAVEL	10		\$4,200
MILFORD BEACH	ASPHALT		WATER	ASPHALT			\$2,700	ASPHALT			\$2,700
MILL CREEK	GRAVEL	10		GRAVEL	10	CHEMICAL	\$6,700				
MILLBROOK	ASPHALT		WATER	ASPHALT			\$5,400	ASPHALT			\$5,400
MILLVILLE	DIRT	5		GRAVEL	10	CHEMICAL	\$16,575				
OLD DINGMANS ROAD	DIRT	4		GRAVEL	10	CHEMICAL	\$11,830				
OLD TRAIN STATION	GRAVEL	30		GRAVEL	30	COMPOST	\$84,900	GRAVEL	30	COMPOST	\$84,900
PETER'S VALLEY	ASPHALT	6		ASPHALT	6		\$800	ASPHALT	6		\$800
RATTLESNAKE SWAMP	GRAVEL	8		GRAVEL	8		\$5,560	GRAVEL	8		\$5,560
RAYMONDSKILL	ASPHALT	20	COMPOST	ASPHALT			\$2,700	ASPHALT			\$2,700
	DIRT	10		GRAVEL	10		\$5,750	GRAVEL	10		\$5,750
RED DOT (NOT NPS PROPERTY)	ASPHALT	20		ASPHALT	20		\$2,700	ASPHALT	20		\$2,700
RESORT POINT	ASPHALT	12		ASPHALT	12	CHEMICAL	\$5,200	ASPHALT	12	CHEMICAL	\$ 5,200
SHANNA	DIRT	40		GRAVEL	40	COMPOST	\$67,500	GRAVEL	25		\$9,150
SILVER SPRAY FALLS	DIRT	2		GRAVEL	2		\$1,820	GRAVEL	2		\$1,820
SKYLINE	GRAVEL	8		GRAVEL	8		\$5,300	GRAVEL	8		\$15,300
SMITHFIELD BEACH	ASPHALT	278	COMPOST	ASPHALT	278		\$5,400	ASPHALT	278		\$5,400
STUCKI POND	GRAVEL	10		GRAVEL	10	CHEMICAL	\$4,375	GRAVEL	10	CHEMICAL	\$4,375
THREE BRIDGES LOT (NOT NPS PROPERTY)	DIRT	25		GRAVEL	25	N/A	\$2,700				
TOM'S CREEK	GRAVEL	20	CHEMICAL	GRAVEL	20	COMPOST	\$50,700	GRAVEL	20	COMPOST	\$50,700
TURN FARM	GRAVEL	14		GRAVEL	14	CHEMICAL	\$9,800	GRAVEL	14	CHEMICAL	\$9,800
UPPER ESHBACK	DIRT	4		GRAVEL	4		\$2,840	GRAVEL	4		\$2,840
UPPER HORNBECKS	DIRT	3		GRAVEL	3		\$2,330	GRAVEL	3		\$2,330
VAN CAMPEN INN	GRAVEL	20		GRAVEL	20	COMPOST	\$50,700	GRAVEL	20	COMPOST	\$50,700
VAN CAMPEN GLEN	GRAVEL	15	CHEMICAL	GRAVEL	15		\$4,950	GRAVEL	15		\$4,950
VAN NESS ROAD	GRAVEL	4		GRAVEL	4		\$2,840				
WALPACK ENVIRONMENTAL	DIRT	30	WATER	GRAVEL	30		\$20,250	GRAVEL	30		\$02,250
WALPACK RIDGE	GRAVEL	5		GRAVEL	5	CHEMICAL	\$6,700	GRAVEL	10	CHEMICAL	\$6,700
WATERGATE	ASPHALT	50	WATER	ASPHALT	50		\$5,400	ASPHALT	50		\$5,400
ZIMMERMAN	DIRT	5		GRAVEL	5		\$5,250	GRAVEL	5		\$5,250

ALTERNATIVE A PARKING AREA

**ALTERNATIVE B
TOTAL \$791,730**

**ALTERNATIVE C
TOTAL \$729,275**

APPENDIX C: PERTINENT LAWS AND REGULATIONS

The following is a partial list of laws, regulations, and policies that pertain to the GMPA and to compliance actions necessary during plan implementation.

FEDERAL LEGISLATION

American with Disabilities Act (42 USC & 1201 et seq.)
Antiquities Act of 1906 (16 USC & 470a et seq.)
Archeological and Historic Preservation Act of 1974 (16 USC & 469a-1)
Archeological Resources Preservation Act of 1979 (16 USC & 470)
Bald Eagle Act (16 USC & 668)
Clean Air Act, as amended (42 USC & 7401 et seq.)
Clean Water Act (33 USC & 1251 et seq.)
Enabling Legislation, Delaware Water Gap National Recreation Area (1965)
Endangered Species Act of 1973, as amended (16 USC & 1531 et seq.)
Fish and Wildlife Coordination Act (16 USC & 661, 662)
Historic Sites Act of 1935 (P.L. 74-292; 49 Stat. 666; 16 USC)
National Environmental Policy Act of 1969 (42 USC & 4321 et seq.)
National Historic Preservation Act of 1966, as amended (16 USC & 470f); Amended 1980 and 1992; P.L. 96-515; 94 Stat. 2997)
National Park Service Organic Act (16 USC & 1 et seq.)
National Trails System Act (P.L. 90-543)
Native American Graves Protection and Repatriation Act (25 U.S.C. 3001)
Parks, Forests, and Public Property (36 CFR 13)
Prime and Unique Agricultural Lands and NEPA (Federal Register 45:59189)
Rehabilitation Act of 1973, as amended (29 USC 792); Amended 1978; P.L. 95-602

EXECUTIVE ORDERS

Executive Order 11593, "Protection and Enhancement of the Cultural Environment"
Executive Order 11988, "Floodplain Management"
Executive Order 11990, "Protection of Wetlands"

POLICIES AND REGULATIONS

National Park Service, U.S. Department of the Interior, Management Policies, (1988)

APPENDIX D: COST ESTIMATES

Table 16: Projected Additional Operations and Maintenance Costs-Alternatives B & C

Activity	Annual Cost
Establish park trails office:	
Trail Coordinator, GS-023-09	\$46,200
Support Costs (20%)	9,200
Increase ranger patrol:	
Seasonal patrol rangers, GS-025-05	\$44,000
Support costs (20%)	8,800
Install trail signage:	
Trail signs	\$1,000
Wayside exhibits	5,000
Trailhead bulletin boards	4,000
Expand seasonal maintenance crew:	
Crew Leader (WG-6) + 5 Laborers (WG-3)	\$72,500
Support Costs (20%)	14,500
Create or revise publications (maps, brochures)	\$5,000
Conduct workshops	\$2,500
Increase monitoring program:	
Seasonal biological technician, GS-5	\$10,000
Special studies contracting	10,000
Total Estimated Annual Operating Costs	\$232,700

Table 17: Projected Development Costs - Alternative B

CONSTRUCTION TYPE	MILES	CONSTRUCTION COST PER MILE	GROSS CONSTRUCTION COSTS	DESIGN COSTS	PROJECT TOTAL
Natural Surface: Improvements and Upgrades	58	\$24,600			
Natural Surface: New Construction	16	\$32,100			
Gravel Surface: Improvements and Upgrades	91	\$97,000			
Gravel surface: New Construction	20	\$145,00			
Trailheads/Parking Lots					
<i>Alternative B Total:</i>			\$16,917,034	\$2,432,200	\$19,354,234

Table 18: Projected Development Costs - Alternative C

CONSTRUCTION TYPE	MILES	CONSTRUCTION COST PER MILE	GROSS CONSTRUCTION COSTS	DESIGN COSTS	PROJECT TOTAL
Natural Surface: Improvements and Upgrades	51	\$24,600			
Natural Surface: New Construction	17	\$32,100			
Gravel Surface: Improvements and Upgrades	81	\$97,000			
Gravel surface: New Construction	19	\$145,00			
Trailheads/Parking Lots	10				
<i>Alternative C Total:</i>			\$15,306,305	\$2,205,146	\$17,511,451

APPENDIX I: CULTURAL RESOURCE CONSULTATION REQUIREMENTS

The following consultation requirements are subject to section 106 of the National Historic Preservation Act of 1966, as amended. After an alternative is selected, NPS would negotiate a park-specific programmatic agreement with the State Historic Preservation Officers in New Jersey and Pennsylvania and the Advisory Council on Historic Preservation, as recommended by the 1994 Programmatic Agreement Among the National Park Service, The Advisory Council on Historic Preservation and the National Conference of State Historic Preservation Officers, the document that guides NPS compliance with section 106 of the National Historic Preservation Act of 1966, as amended.

ALTERNATIVE B MANAGEMENT PRESCRIPTIONS

CONSULTATION REQUIREMENTS

Appropriate numbers of trails and facilities consistent with visitor use are available and accessible. Possible actions include:

- | | |
|--|--|
| • Alignment and design of new trails. | SHPO/ACHP review required |
| • Construction of new sections of trail. | SHPO/ACHP review required |
| • Resurfacing of present park trails or former road traces as new trails. | Programmatic Exclusion IV.B.6 |
| • Developing formal trailheads with parking, maps, kiosks and signage | SHPO/ACHP review required for new construction |
| * Installing more portable toilets or comfort stations where appropriate | SHPO/ACHP review required for new construction of comfort stations |
| • Maintaining present park trails or new sections of trail. | Programmatic Exclusion B.IV.A.6 for maintaining existing trails. |
| • Archeological surveying proceeding any new construction and/or ground disturbance. | Programmatic Exclusion IV.B.4 |

APPENDIX J: PUBLIC LETTERS AND RESPONSES

PUBLIC INVOLVEMENT LETTERS

Under the National Environmental Policy Act of 1969, the National Park Service is required to seek the comments of government agencies, organizations, and the public with regard to actions proposed by the agency. This is done through public meetings and public review of planning documents.

During public review, written comments were provided to the National Park Service by federal, state, and local government agencies; by organizations; and by individuals. Approximately 71 letters commenting on the draft plan were received during the public comment period. Letters that were received regarding the plan are

reproduced here along with corresponding National Park Service responses. Not all comments required a response. Private addresses and phone numbers have been blacked out in the document to preserve the privacy of individual citizens.

COMMENTS

30



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

OCT 05 1989

Mr. William Laitner
Superintendent
Delaware Water Gap National Recreation Area
1 River Road
Bushkill, PA 18324

Re: Draft Environmental Impact Statement for the Delaware Water Gap National Recreation Area, Draft Trails Plan and General Management Plan Amendment; Delaware River, Pennsylvania and New Jersey. CEQ Number 990283.

Dear Mr. Laitner:

In accordance with the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, the Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) for the Delaware Water Gap National Recreation Area (DWGNRA) Draft Trails Plan and General Management Plan Amendment. The DEIS describes several proposed actions, including the No-Action Alternative, to enhance the trails system at DWGNRA and describes the environmental consequences of implementing those actions. The stated purpose of the project, as described in the DEIS, is to provide a comprehensive trails plan that would address the long-term needs of visitors and balance natural resource protection. The document describes three alternative scenarios to meet this project purpose including the No Action alternative. Those alternatives are:

1. Alternative A - Alternative A is described as the No-Action alternative. Discussion of this alternative describes the current situation and assumes the continuation of current management practices for trails. It assumes that the park would operate without a coordinated trail system and would remain as it currently exists.
2. Alternative B - Alternative B is the park's preferred alternative. This plan would double the amount of present park trail miles and provide greater opportunities for biking, cross-country skiing and equestrian activities. Trails would be organized into networks emphasizing natural features at the park. Comfort facilities, signage and interpretation would be expanded.
3. Alternative C - Alternative C also emphasizes trail networks but is organized in smaller geographic areas highlighting specific use areas. Opportunities for linkages with other trails would be limited. Comfort facilities, signage and interpretation would be expanded.

Environmental impacts associated with the alternatives include minimal cutting and filling for upgrading of existing trails and the construction of new trails, impacts to prime

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DELAWARE WATER GAP

COMMENTS

agricultural land, and the potential for short term impacts to waters or wetlands due to trail construction.

After reviewing the DEIS, EPA has rated the DEIS an LO-1, lack of objections, adequate information. This rating indicates that the DEIS contains sufficient information for EPA to fully assess the environmental impacts and that there are no objections to proceeding with project development. See the enclosure for a further explanation of the EPA rating system.

Thank you for the opportunity to comment on this project. EPA requests a copy of the Final Environmental Impact Statement (FEIS) and Record of Decision (ROD) when released. Should you have any questions regarding our comments, please contact Regina Poeske at 215-814-2725.

Sincerely,

John D. Forren, Program Manager
NEPA and Wetlands Regulatory Review

COMMENTS

COMMENTS

DELAWARE WATER GAP



United States Department of the Interior

FISH AND WILDLIFE SERVICE

P.O. Box H
Tobyhanna, PA 18466-0080



D3013/L7617 (MGMT)

October 5, 1999

The Eastern Pennsylvania Field Office (EPAO) and the New Jersey Field Office (NJFO) have reviewed the June 1999 "Draft Trails Plan / General Management Plan Amendment / Environmental Impact Statement, Delaware Water Gap National Recreation Area" (Draft Plan/EIS), and have the following comments to offer.

General

The trail alternatives presented within the Draft Plan/EIS are broad and conceptual, rather than site-specific. While a general comparison of potential environmental impacts has been provided and is appropriate for the purposes for which the document has been prepared, a more in-depth analysis of impacts to natural resources must be prepared prior to any actual trail construction.

Water Resources

A comprehensive inventory of wetlands was conducted using aerial photographs. Wetlands less than one acre in size are not shown. Field delineations will need to be done prior to any actual trail construction in order for the U.S. Fish & Wildlife Service (Service) to properly analyze impacts to waters and wetlands.

Federally Listed Threatened and Endangered Species

The Draft Plan/EIS adequately describes federally listed threatened and endangered species occurring within the Delaware Water Gap National Recreation Area and the broad scale potential impacts to these species from each of the proposed alternatives.

Suitable habitat for bog turtles (*Clemmys muhlenbergii*) is known to occur in 44 wetlands within the park, and turtles have been documented in five of those sites. In addition, suitable habitat exists for northeastern bulrush (*Scirpus ancistrochaetus*).

Alternatives B and C include a proposed new trail, the McDade Recreational Trail. Approximately 9.25 miles of the McDade Recreational Trail encroach within the 400-meter protective buffer zone established around documented bald eagle (*Haliaeetus leucocephalus*) wintering habitat. The Service recommends that the National Park Service explore additional alternatives or re-route portions of the McDade Recreational Trail to avoid potential adverse impacts to wintering eagles.

Consultation with the Service pursuant to Section 7 of the Endangered Species Act (87 Stat. 884; 16 U.S.C. 1531 *et seq.*) will be required prior to construction of any trail or trail segment that may affect any federally listed species occurring within the project vicinity.

Summary

The Service acknowledges that the Draft Plan/EIS is largely conceptual. Impacts to sensitive resources, including waters, wetlands and threatened and endangered species, need to be considered in order to avoid and minimize adverse impacts that will be associated with the construction of the trail.

Please contact Maria Tur of my staff at (570) 894-1275 or Annette Scherer of the NJFO (609) 646-9310 if you have any questions regarding these comments.

Sincerely,

Jared Brandwein
Jared Brandwein
Supervisor

COMMENTS

32



State of New Jersey

Christine Todd Whitman
Governor

Department of Environmental Protection

Division of Parks and Forestry
P.O. Box 404
Trenton, New Jersey 08625-0404
Tel. # 609-292-2733
Fax. # 609-984-0503

Robert C. Shinn, Jr.
Commissioner

August 31, 1999

Mr. J. Robert Kirby
Acting Superintendent
Delaware Water Gap National Recreation Area
Bushkill, Pennsylvania 18324

Dear Superintendent Kirby:

The New Jersey Division of Parks and Forestry has received copies of your draft Trails Plan and commend the efforts of the National Park Service to develop a coordinated plan for the development and management of trails within the area. The plan was reviewed by the superintendents of our adjacent parks and forests, the northern Regional Office of the State Park Service, and the Office of Natural Lands Management. The following comments are based on their review of the plan.

Of the three alternatives, we agree with the trail network recommended under Alternative B. This alternative will provide for diversified trail use, as well as opportunities for connections to trails within New Jersey's state parks and forests.

We do not have specific standards for trail surfaces and minimum width, given the varying conditions throughout the state. However, what you are proposing is similar to those used within many of our state parks and forests. For multiple use trails, the minimum eight foot tread width can be less if shoulders are grass that can be used for passing and straight-aways provide adequate sight lines. This would still maintain a safe and rewarding outdoor experience without dramatically altering the natural landscape.

The Country Road Trail, Mountain Road Trail, and Farmers Trace Trail are close to existing and potential trails within High Point State Park and Stokes State Forest. In the future, these can be connected to provide the most expansive trail network in northern New Jersey.

We agree with maintaining hiking use only for the Red Dot and Blue Blaze trails, as these connect to Worthington State Forest where they are also hiking-only trails. We believe the same use should be maintained within both jurisdictions. However, in the descriptions of these two trails (page 27 and page 38 respectively), we request that you note that parking for and sections of these two trails are found within Worthington State Forest.

In terms of equestrian use, there will not be enough mileage of trails available for most riders, other than those living nearby. I urge you to consider increasing the equestrian mileage, either for loops or increased distance. It is possible to have multiple use of equestrian, hiking and

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COMMENTS

mountain biking on the same trail, as we have on many of our multiple use trails, such as the Paulinskil Valley and Sussex Branch trails, as well as trails in High Point State Park and Stokes State Forest. With proper management for maintaining sight lines, grades that are not steep, and adequate room for passing, you can provide compatible and safe use for all.

Finally, when preparing any literature about the trails, we recommend that the National Park Service not allow the individual partners prepare maps and brochures, as they may provide incorrect information, or fail to include other information and park requirements. However, receiving their input before publication can be useful in including information that the staff might not have considered, but is necessary.

Thank you for allowing us the opportunity to provide input into the trails planning process for DEWA. Please feel free to contact Celeste Tracy at 609-984-1173 if you have any questions.

Sincerely,

Gregory A. Marshall
Director

cc: Paul Stern
William Foley
John Keator
Helen Maurella

COMMENTS

COMMENTS

DELAWARE WATER GAP



State of New Jersey

Christine Todd Whitman
Governor

Department of Environmental Protection

Division of Parks & Forestry
Historic Preservation Office
PO Box 404

Trenton, NJ 08625-0404

TEL: (609)292-2023

FAX: (609)984-0578

October 13, 1999

HPO-J99-43

Robert C. Shinn, Jr.
Commissioner

William G. Laitner, Acting Superintendent
United States Department of the Interior
National Park Service
Delaware Water Gap National Recreation Area
Bushkill, PA 18324

RE: Sussex and Warren Counties
Delaware Water Gap National Recreation Area (DWGNRA)
General Management Plan Amendment and Environmental Impact Statement for
DWGNRA Draft Trails Plan

Dear Mr. Laitner:

Thank you for forwarding the Draft Trails Plan for our review and comment. I am pleased that avoiding areas of high archaeological sensitivity was considered as a factor in the development of the Draft Trails Plan, and endorse the procedure for compliance with Section 106 of the National Historic Preservation Act laid out on pages 67 and 67.

I believe the Draft Trails Plan understates the potential positive effect of Alternate B on cultural landscapes in the Park. The development/enhancement of the County Line Trail, which follows trace historic roadways, would preserve the historic circulation pattern of the cultural landscapes it passes through and by. At the same time, I am sensitive to concerns that "overdevelopment" of trails would damage the natural character of the DWGNRA. I look forward to a thoughtful and sensitive implementation of the Plan.

If you have any questions, please contact Dan Saunders of my staff at (609) 633-2397.

Sincerely,

Dorothy P. Guzzo

Dorothy P. Guzzo
Deputy State Historic
Preservation Officer

DPG/DS99-1930

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COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF TRANSPORTATION

Engineering District 5-0
1713 Lehigh Street
Allentown, Pennsylvania 18103
August 11, 1999

Public Review and Comment for the Draft General Management Plan Amendment (GMPA) and Environmental Impact Statement (EIS) for Delaware Water Gap National Recreation Area's "Trails Plan"

Robert J. Kirby, Acting Superintendent
United States Department of the Interior
National Park Service
Delaware Water Gap National Recreation Area
Bushkill, PA 18324

Dear Mr. Kirby:

I am writing in response to your letter dated July 9, 1999 concerning the draft GMPA (General Management Plan Amendment) and EIS (Environmental Impact Statement) for Delaware Water Gap National Recreation Area's "Trails Plan".

The GMPA and EIS have been reviewed by our District Planning and Programming Engineer and our District Environmental Manager. The District has no negative comments regarding the plan and trail alternatives. We wish you success in your endeavor to implement the plan.

If you have any questions, please contact either James R. McGee, PE, District Planning and Programming Engineer, at 610-798-4158 or Elbert J. Neal, District Environmental Manager, at 610-791-6008.

Very truly yours,

Donald E. Lerch

Donald E. Lerch, PE
Assistant District Engineer for Design
Engineering District 5-0

050/JRM/lmb

COMMENTS

COMMENTS



Pennsylvania Department of Conservation and Natural Resources
Rachel Carson State Office Building
P.O. Box 8551
Harrisburg, PA 17105-8551
July 20, 1999

Bureau of State Parks

717-787-6640

Mr. J. Robert Kirby
Acting Superintendent
Delaware Water Gap National Recreation Area
1 River Road
Bushkill, PA 18324

Dear Mr. Kirby:

On behalf of Governor Tom Ridge, I am responding to your letter of July 9, 1999, concerning your Draft Management Plan Amendment and Environmental Impact Statement for the Delaware Water Gap National Recreation Area's Trail Plan. We appreciate the opportunity to review and comment on the Draft Plan and will forward any significant comments to you in the next two weeks.

Sincerely,

A handwritten signature in dark ink, appearing to read "Roger Fickes", is written over a circular official stamp.

Roger Fickes
Director

COMMENTS

COMMENTS

DELAWARE WATER GAP



Lehman Township Board Of Supervisors

RR 4, BOX 4000 • BUSHKILL, PIKE COUNTY, PENNSYLVANIA 18324 • (570) 588-9385 • FAX (570) 588-1864

August 20, 1999

National Park Service
Delaware Water Gap National Recreation Area
Bushkill, PA 18324

Dear Friends:

The Lehman Township Planning Commission and the Township Supervisors have reviewed your DRAFT TRAILS PLAN and offer the following comments.

We consider the overall recreational facilities provided within the DWGNRA as valuable asset to the entire region. However, in evaluating the Trails Plan alternatives we have addressed ourselves more specifically to the facilities located in our immediate area. These nearby facilities would be those most utilized by our full-time residents, our second home owner residents and the many visitors to our area.

As both Alternatives B and C would substantially increase the trail facilities in the Lehman Township area, we strongly support either B or C over Alternative A. Increased facilities equate to greater opportunities for nearby recreational activity for our residents and our visitors.

On this same basis we would prefer Alternative B over C, as an interconnected trail system would greatly increase recreational options, and attract more usage than would a more fragmented system of trails. We view greater usage as a greater return on the investment made in developing trails.

We thank you for the opportunity to comment on your proposals.

Sincerely,
Lehman Township Board
of Supervisors

Walter P. Bensley,
Chairman

John P. Sivick,
Vice Chairman

Angel M. Schmidt,
Supervisor



R.D. 5 • BOX 5229 • EAST STROUDSBURG • PENNSYLVANIA • 18301
(570) 421-6931 • FAX (570) 421-6697

August 24, 1999

J. Robert Kirby, Acting Superintendent
National Park Service
Delaware Water Gap National Recreation Area
Bushkill, Pa. 18324

Ref: "Trails Plan"

Dear Mr. Kirby:

Thank you for allowing Smithfield Township the opportunity to comment on the draft "Trails Plan" dated June, 1999.

The Township generally supports the concept of "Alternative B" as described in the document. However, we do believe additional explanation is required on Page 15 in the "Alternative B" description. Additional commentary should be provided on various trail opportunities outside the park. This addition would refer to partnerships such as the continuation of trails over private or municipal lands that have been discussed to link the southern end of the McDade Trail through the Village of Shawnee and Smithfield Township's park on River Road, to the Appalachian Trail in Delaware Water Gap.

We urge Congress to provide the appropriate funding to proceed with implementing the trails program.

Thank you for your consideration.

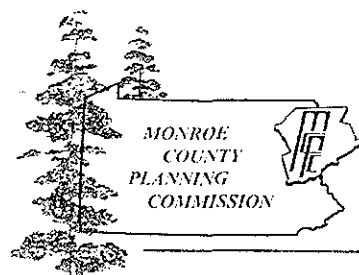
Sincerely,

Russell C. Albert, II, Chairman
Smithfield Township Board of Supervisors

RA:j

COMMENTS

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August 24, 1999

J. Robert Kirby
Acting Superintendent
National Park Service
Delaware Water Gap National
Recreation Area
Bushkill, PA 18324

ADMINISTRATIVE CENTER
1 QUAKER PLAZA, ROOM 106
STROUDSBURG, PA 18360-2169
TELEPHONE: 570-420-3562
FAX: 570-420-3564
mcpc@microserve.net

Re: Delaware Water Gap National Recreation Area
Draft Trails Plan, General Management Plan Amendment
Environmental Impact Statement

Dear Mr. Kirby:

The above noted plan was reviewed by Eric Bartolacci, Environmental Planner, on behalf of the Monroe County Planning Commission. You will find his comments enclosed.

We appreciate the opportunity to review this plan and wish you continued success at the Park Service.

If you have any questions or if we can be of further service, please contact me.

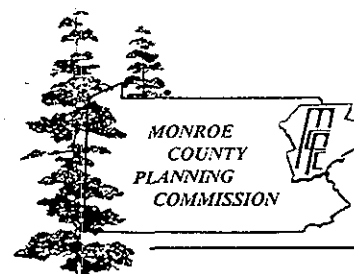
Sincerely yours,

John Woodling
John Woodling
Planning Director

JW/jc

DELAWARE WATER GAP

COMMENTS



TO: John Woodling, Planning Director
FROM: Eric Bartolacci, Environmental Planner
DATE: August 23, 1999
SUBJECT: Delaware Water Gap National Recreation Area
Draft Trails Plan, General Management Plan Amendment
Environmental Impact Statement

ADMINISTRATIVE CENTER
1 QUAKER PLAZA, ROOM 106
STROUDSBURG, PA 18360-2169
TELEPHONE: 570-420-3562
FAX: 570-420-3564
mcpc@microserve.net

This plan addresses the need to amend the General Management Plan (1987) for the Delaware Water Gap National Recreation Area (DWGNRA). The original plan is no longer adequate to address the policy and operational issues now facing park managers. This amendment provides for three possible alternatives:

Alternative A (no-action)

Alternative A represents the current situation of the Park. This alternative proposes to continue the current management practices for trails. Resources already impacted from overuse would continue to experience degradation.

Alternative B

Alternative B is the Park's preferred plan. This alternative would double the amount of trail miles in the park and provide greater opportunities for a larger number of activities. Trails would be organized into four individual groups with connections to each other. This alternative also provides for possible interconnections to trails located outside the Park.

Alternative C

Alternative C also organizes trails into groups. These trail groups, however, are focused into small distinctive geographic areas. This alternative only allows for limited interconnection to trails located outside the Park. The Monroe County municipalities which border the park have shown interest in connecting to the park where possible. Connections between these municipalities and the park would regionalize open space, provide for larger and more diverse trail systems and thereby further the County goal of a "system of open space or a 'green infrastructure'". Non-vehicular connections between open space areas are a major component of the system.

The Staff has reviewed the plan amendment and recommends that the DWGNRA focus on Alternative B. This alternative is the most comprehensive, provides for the greatest number of varying experiences and allows for interconnections between park trails and trails located outside of the park.

COMMENTS

RESPONSES



Appalachian Mountain Club

Mid-Atlantic Office
P.O. Box 118, Titusville, NJ 08560
(609) 818-1776, Fax: (609) 737-7264
E-mail: tgilbert@igc.org

September 15, 1999

William G. Laitner
Superintendent
Delaware Water Gap National Recreation Area
1 River Rd.
Bushkill, PA 18324

Dear Superintendent Laitner:

I am writing on behalf of the Appalachian Mountain Club to comment on the Draft Trails Plan/ General Management Plan Amendment/ Environmental Impact Statement for the Delaware Gap National Recreation Area (DWGNRA).

AMC is a non-profit membership organization with over 80,000 members whose mission is to "promote the wise use, protection, and enjoyment of the mountains, rivers, and trails of the Northeast." Our involvement in the DWGNRA includes a long history of chapter outings into the area, management of the Mohican Outdoor Center, and maintenance of several trails within the park. As our commitment to do 1000 hours of trail work annually in the DWGNRA has been hampered by the lack of a comprehensive trails plan, in general we view this planning process as positive step. However we do have a number of concerns and suggestions regarding the specifics of the plan.

I. Protect the Appalachian Trail experience- As you know, the 27.3 miles of the Appalachian National Scenic Trail (AT) that runs through the DWGNRA is one of the most heavily used sections of the entire AT. It is also the most popular trail in the park, attracting more than one fourth of the current trail use in the DWGNRA, and more than 50,000 visitors each year. In order to preserve the experience on the AT as that of a "simple footpath", additional trails and recreational opportunities should be developed and encouraged in the DWGNRA. However, great care must be taken to ensure that new trails do not facilitate increased or unauthorized access to the AT, thereby producing the exact opposite of the desired effect.

We are concerned that several proposed side trails to the AT, and proposed multi-use trails in close proximity to the AT would increase the flow of visitors to the Trail, and provide AT access to mountain bikers and other unauthorized users. Specific trails of



IN REPLY REFER TO:

L3421

November 15, 1999

Thomas A. Gilbert
Mid-Atlantic Conservation Advocate
Appalachian Mountain Club
P.O. Box 118, Titusville, NJ 08560

Dear Mr. Gilbert:

Thank you for your comments regarding the Draft Trails Plan for Delaware Water Gap National Recreation Area. We recognize the importance of the Appalachian National Scenic Trail (AT), and we are sensitive to the potential effects that the development of additional trails within the recreation area could have on the Appalachian Trail.

The majority of the public comments were in favor of Alternative B. Accordingly, the Trail Plan will reflect that preference, but we will make some modifications related to your concerns regarding the Appalachian Trail.

The Woods Road Trail will not be designated for bicycle use. It will remain in the plan as a hiking trail.

The Van Campens to Rattlesnake Connector Trail will not be included in the Plan.

We believe that the Pool Colony Trail should remain in the Plan. We understand your concerns regarding its proximity to the Appalachian Trail, but we believe that a well signed trail, and the elimination of the potential connector points can resolve your concerns.

We believe that the Farmer's Trace Trail should remain in the plan, and be designated for bicycle and equestrian use. Although that trail will be close to the AT, the ability to provide connections to Stokes State Forest is very desirable, and was supported by the State Forest Superintendent. We believe that providing an opportunity for bicycles and equestrian users, while eliminating potential connecting points to the AT will be beneficial to both the AT hikers and to other users.

We believe that the connection from Crater Lake to Hemlock Pond (the Orange Trail) must remain in the plan as a hiking trail. We agree that that is a potential access point for bicycles using the Blue Mountain Lakes Trail. However, thus far we have only seen an occasional bicyclist on that trail, and we believe that we can adequately control that activity.

We received a considerable amount of public comment regarding the "12 foot-wide, gravel-surfaced trails". It is not our intent to build trails 12 feet wide. Our intent is to build trails suitable for multi-use, and the standard that we referred to was an eight-foot wide trail with two-foot shoulders on either side. Only the eight-foot section would be compacted and hardened, using crushed stone and natural materials, the shoulders would be cleared both to provide better sight distances and to eliminate branches and stumps that could injure a rider. The plan does not call for opening multi-use trails to off-road vehicles.

Main Office • Five Joy Street, Boston, MA 02108 • 617-523-0930 FAX 617-523-0722

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COMMENTS

RESPONSES

concern include the Van Campens to Rattlesnake Connector, Woods Road Trail, Farmers Trace Trail, Mountain Road Trail, and the connector between the Blue Mountain Lake Trail and Crater Lake Loop Trail. In addition, mountain bikers could gain access to the AT via the Pool Colony Trail and old woods roads. Most of these trails are eliminated in Alternative C, with the exception of the Blue Mountain-Crater Lake connector and the Pool Colony Trail. In order to maintain adequate buffers to the AT, these trails should be eliminated, perhaps with the exception of the Pool Colony Trail, if the old woods roads can be closed off.

2. Minimize resource impacts from multi-use trails- While there is a legitimate need for multi-use trails within the DWGNRA, we are concerned that the 18 miles of multi-use trails proposed in Alternatives B and C would require heavy machinery to construct 12' wide gravel roads. This width and surface are unnecessary to accommodate these uses and will have unacceptable environmental impacts. Hardened natural soil surfaces on existing old roads should be sufficient and far more benign to the soil, water and wildlife resources of the area. Off-road vehicle use should not be permitted on multi-use trails to prevent adverse environmental impacts and conflicts with more passive recreational users.

3. Facilitate cooperative management among all user groups- With increased access to the DWGNRA, other user groups must share in the maintenance of new trails. AMC's experience within the DWGNRA as well as other regions has shown that coordinating efforts of maintaining clubs helps provide constancy and communication and develop a broader sense of stewardship. We recommend that the National Park Service create a forum for bringing the various trail maintainers together to discuss concerns, work out problems, share skills and promote the highest standards of stewardship.

4. Provide adequate resources for maintenance and enforcement- The benefits of expanded trail and recreational opportunities will be lost if there are insufficient staff and financial resources to maintain trails and facilities, enforce park regulations, and ensure the safety of visitors to the DWGNRA. The trail network should not be expanded to a point where it will exceed the capacity of the National Park Service and your partners to manage it. The value of signage, maps and public information should not be overlooked as the most basic and cost effective management tools available.

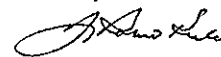
5. Conduct required site specific study of environmental resources and impacts- It appears that sufficient site specific study of the potential impacts of new trails on soils, water resources, fish & wildlife, vegetation and threatened or endangered species has not been conducted. This information must be gathered and made available before individual trails are constructed, and utilized to adjust trail routes accordingly and mitigate environmental impacts as necessary. For example, the proposed Silver Spray Falls Trail passes through an area with steep slopes and thin, fragile soils, and should be rerouted to avoid this environmentally sensitive area.

In Summary, Alternative C appears to strike a better balance than Alternative B by providing increased recreational opportunities while maintaining appropriate buffers

We agree that management of increased visitor use and user conflicts must accompany the development of any new trails. Beginning on page 19 in the Draft Trails Plan/GMPA/EIS, there is a listing of the management prescriptions and examples of appropriate actions the park will undertake as part of the implementation of the final plan. The evolution from the conceptual Trail Plan to actual implementation will not take place quickly. As indicated on page 42 of the Draft Plan, before any new trails are developed, all of the associated concerns, such as environmental impacts, parking, sanitary facilities, maintenance, and management of visitor use must be addressed. Pages 55-56 of the Draft Plan describe the level of analysis that was conducted for this planning process to predict impacts on the park's resources.

We value the long-standing relationship that we have had with the Appalachian Mountain Club. We look forward to working together with you to manage trails in the best way possible that will meet the mission of the National Recreation Area; to provide outdoor recreation opportunities while conserving the natural, cultural and scenic character of the area.

Sincerely,



William G. Lainer
Superintendent

COMMENTS

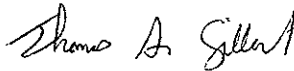
RESPONSES

DELAWARE WATER GAP

around the AT and not exceeding existing management capacity. However, we still have concerns with Alternative C, such as the proposed 12' wide gravel multi-use trails, the lack of site specific study of potential environmental impacts, and problems with specific trails as noted above. These issues would need to be addressed before we could endorse any alternative.

In closing, we thank you for the opportunity to comment on the future direction of the DWGNRA, and we look forward to a continued partnership to manage and maintain this special area.

Sincerely,



Thomas A. Gilbert
Mid-Atlantic Conservation Advocate

COMMENTS

RESPONSES

APPALACHIAN TRAIL CONFERENCE

Mid-Atlantic Regional Office
P.O. Box 625
4 East First Street
Boiling Springs, Pennsylvania 17007-0381
(717) 258-5771
Facsimile: (717) 258-1442



September 30, 1999

Superintendent Laitner
Delaware Water Gap National Recreation Area
1 River Rd.
Bushkill, PA 18324

Dear Superintendent Laitner,

Thank you for the opportunity to provide comments on the Draft Trails Plan for the Delaware Water Gap National Recreation Area. I am particularly grateful for the fact that the NRA responded favorably to the public request that you extend the comment period and host an additional public information meeting at Bushkill. You are to be commended for making these extra efforts.

The Appalachian Trail Conference (ATC) is a volunteer based 501(c)(3) organization with over 26,000 individual members. ATC serves as an umbrella organization for the 31 Trail clubs who conduct the day-to-day management and operations of the Appalachian National Scenic Trail. These activities are conducted under a unique delegation agreement that exemplifies the public/private cooperative management system which is the hallmark of the A.T.

As you know, the specific responsibilities of each A.T. management partner are detailed in the Memorandum of Understanding for the Appalachian National Scenic Trail within and near Delaware Water Gap National Recreation Area, executed in 1997. Signatories of that document include Delaware Water Gap National Recreation Area, Appalachian Trail Park Office, Appalachian Trail Conference, New York-New Jersey Trail Conference, Wilmington Trail Club, and Batons-Rouge Club. In preparing these comments, I have been in contact with New York-New Jersey Trail Conference, Wilmington Trail Club, and the Delaware Valley Chapter of the Appalachian Mountain Club, who operate Camp Mohican in the NRA as a Trailside facility under a Cooperative Agreement with the NRA.

The hiking community is pleased to see that DWGNRA management recognizes the need to develop a comprehensive trails plan to provide for the increased demand for a variety of trail opportunities in the 67,000 acre NRA. The Appalachian Trail Conference is particularly interested in the proposed alternatives that will potentially have an effect on the 27 miles of the Appalachian National Scenic Trail experience as the footpath passes through the Recreation Area.

We recognize this is one of the most heavily used sections of the entire 2160 mile-long A.T., due in part to its close proximity to major metropolitan areas and ready access. This level of visitation has grown to

National Office: 799 Washington Street, P.O. Box 607, Harpers Ferry, West Virginia 25425 • (304) 535-6331

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				James M. Whitney, Jr.	

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United States Department of the Interior

NATIONAL PARK SERVICE
Delaware Water Gap National Recreation Area
Bushkill, Pennsylvania 18324



IN REPLY REFER TO:

13421

November 15, 1999

Karen L. Lutz
Appalachian Trail Conference
Mid-Atlantic Regional Office
P.O. Box 625, 4 East Street
Boiling Springs, PA 17007-0381

Dear Ms. Lutz:

Thank you for your comments regarding the Draft Trails Plan for Delaware Water Gap National Recreation Area. We recognize the importance of the Appalachian National Scenic Trail, and we are sensitive to the potential effects that the development of additional trails within the recreation area could have on the AT.

The majority of the public comments were in favor of Alternative B. Accordingly, the Trail Plan will reflect that preference, but we will make some modifications related to your concerns.

The Woods Road Trail will not be designated for bicycle use. It will remain in the plan as a hiking trail.

The Van Campens to Rattlesnake Connector Trail will not be included in the Plan.

We believe that the Farmer's Trace Trail should remain in the plan, and be designated for bicycle and equestrian use. Although that trail will be close to the AT, the ability to provide connections to Stokes State Forest is very desirable, and was supported by the State Forest Superintendent. We believe that providing an opportunity for bicycles and equestrian users, and eliminating potential connecting points to the AT, will be beneficial to both the AT hikers and to other users.

The trail system planning included discussions concerning accessibility. As part of the trails planning effort, a preliminary evaluation for accessibility was done on some trail segments in accordance with the Recreation Opportunity Spectrum (ROS) classification. This classification was developed by the USDA Forest Service and further refined by The Design Guide: Universal Access to Outdoor Recreation, published by PLAE, Inc. 1993. The ROS divides recreation settings into four basic categories from urban to primitive and then rates the individual trail segments from easy to most difficult. It is anticipated that detailed evaluations and ratings will be completed on all trail segments as they are implemented. ADA guidelines will be reviewed and incorporated where appropriate.

We agree that management of increased visitor use and user conflicts must accompany the development of any new trails. Beginning on page 19 in the Draft Trails Plan/GMPA/EIS, there is a listing of the management prescriptions and examples of appropriate actions the park will undertake as part of the implementation of the final plan. The evolution from the conceptual Trail Plan to actual implementation will not take place quickly. Pages 55-56 describe the level of analysis that was conducted for this planning process to predict impacts on the park's resources. As indicated on page 42 of the Draft Plan, before any new trails are developed, all of the associated concerns, such as environmental impacts, parking, sanitary facilities, maintenance, and management of visitor use will be addressed. A team of landscape architects, engineers, planners, maintenance and trail crews and appropriate experts will be involved with the design of new trails.

COMMENTS

RESPONSES

be a major challenge in managing the Trail for a "primitive experience" as defined by the Appalachian Trail Conference's Board of Managers in a 1995 adopted policy. The assumption that loop trails which intersect with the A.T. will provide opportunities for hikers to disperse off the A.T. thereby, lessening overuse impact, deserves close scrutiny. Indeed, without a carefully researched planning effort, additional loop trails may bring even more traffic to the Trail's primitive character, and overuse-types of resource damage to the A.T. It is our understanding that the proposed alternatives are conceptual in nature and have not benefited from extensive field review.

Both Alternative B and Alternative C are predicated on a significant commitment of resources, whose size has not been identified. Our primary concerns center around assuring that the A.T. remain off-limits and inaccessible to what have traditionally been viewed as conflicting uses. These include but are not limited to horses and bicycles. The projected additional operations and maintenance budget (Table 16, pg. 87) calls for increased ranger patrol, probably four or five additional seasonal rangers. To the best of our knowledge, no backcountry (or other) range regularly or systematically patrol the existing 112 miles of the park's 32 trails. Alternative B doubles the existing mileage to 224 miles and proposes an additional 22 trails, while alternative C adds 66 miles on 11 new trails. Crea-
The additional mileage of either alternative, ranger patrols will have a potentially demanding task.

The Appalachian Trail Conference supports Alternative C because it provides for increased recreation opportunities within the National Recreation Area, yet reduces the potential for conflicting uses by minimizing a number of places where trails designed for, and used by, equestrians and bicyclists come near, or intersect with, the A.T. We strongly encourage the development of a management plan that addresses education and enforcement to assure that user conflicts are minimized. We would encourage DWGNRA to have a system in place for dealing with increased visitation and the inevitable user conflicts prior to opening new trails. We are specifically concerned at the Wood's Road and Farmers Trace trails identified in Alternative B.

The following are questions/comments about specific aspects of the draft plan:

The Draft Plan does not address the recently completed (although yet unpublished) accessibility (ADA) guidelines for new trails and backcountry recreational facilities. How does the NRA plan to incorporate the new guidelines?

Was it an oversight, or intentional that perhaps the most popular trail (a "blue trail") the Delaware River, was not mentioned in the plan? It seems unlikely that any major commitment of resources in the NRA can be proposed without having implications to what is arguably the NRA's most valuable natural, scenic, and recreational resource.

The plan proposes additional sanitation facilities in both Alternative B and C. Is there any plan to provide drinking water sources in association with these facilities?

Fig. 5 The plan states: "Recognize and minimize conflicts among user groups. People using the park's trail system have different needs and expectations. Often uses are seen as competing rather than cooperative. Good trail design and an educated user will increase satisfaction in trail experiences." What expertise will be brought into the Trail design process and how, specifically, will users be educated?

Fig. 14 The plan provides trendwidth specifications for various types of trails. It would be helpful to cite specific expert resources (e.g. SCA's *Lighly on the Land*, ATC's *Trail Design Construction and Maintenance*, etc.)

Fig. 15 In the last sentence of the section on both Alternatives B and C, the plan states "Comfort facilities, signage and interpretation would be expanded as formalized as trailheads were developed." What about enforcement and resolving user conflicts?

Fig. 17 Under Resource Preservation for Alternative A, the plan states "Any existing impacts to resources would continue. Erosion, vegetation loss and habitat disturbance would occur due to overuse and crowding." It is extremely unsettling that DWGNRA would accept continued degradation of the very resources they are charged with protecting without planning corrective action. This is routine base resource management.

References to the Wilmington Hiking Club on pages 17, 21, and 24 have been corrected to read Wilmington Trail Club.

Under Alternative A: Continuation of Current Management Practices, the current signage system for the park would remain. Alternatives B & C advocate the development of a coordinated trail signage and interpretive system.

Appendix B on pages 83-84 in the Draft Plan describes the different types of toilet facilities and their present and future locations by trailheads.

The park has not determined what carrying capacity model will be implemented. It is our intention to involve our trail partners in this decision in order to ensure that the information generated is beneficial to all the cooperating organizations.

On page 27, the term "Memorandums" has been changed to "Memorandum".

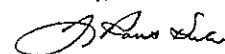
In reference to page 60, Surface Waters, Streamflow, Water Quality under Alternative A, any impacts currently having an adverse effect on surface waters, streamflow or water quality would continue to be handled on an individual basis as they are discovered by park staff or cooperators. Any other undiscovered impacts would likely continue.

The Trailhead/Parking Area Cost Estimates in Appendix B on page 83-84 in the Draft Plan is organized by existing and proposed trailhead facilities. Facilities located along the Appalachian Trail have been included.

In Appendix C: Pertinent Laws and Regulations on page 85, the National Trails System Act has been added.

We value the long-standing relationship that we have had with the Appalachian Trail Conference. We look forward to working together with you to manage trails in the best way possible that will meet the mission of the National Recreation Area; to provide outdoor recreation opportunities while conserving the natural, cultural and scenic character of the area.

Sincerely,


William G. Luitner
Superintendent

COMMENTS

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Under Visitor Experience the plan states: "...the park's most significant resources such as hemlock ravines..." Much of the park is suffering from infestation of the Hemlock Woolly Adelgid which may devastate its precious resource. Does the park plan to combat the Adelgid?

Under the last sentence in Operations, Partnerships and Cooperative Actions the plan states: "Various park divisions would continue to assume responsibilities for law enforcement, maintenance and interpretation with limited internal coordination." Perhaps closer coordination between divisions would result in improved protection of the resources and better service to the public.

Pg. 17, 21, 24 (and elsewhere?) Throughout the document, Wilmington Trail Club is misspelled "Wilmington Hiking Club."

Pg. 18 Under the first mission goal "Actions Taken" May we suggest that DWGNRA implement a Limits of Acceptable Change (LAC) model?

Under the second mission goal, the plan acknowledges that "directional and interpretive signage is inadequate and difficult to understand" and the action taken suggests "Keep existing directional and interpretive signs." This is unacceptable.

Pg. 19, 23 Under the last sentence in Visitor Use and Facilities the plan talks about "appropriate toilets." Given the all too recent debacle over your facility at Raymondskill Falls, an unfortunate fiasco with implication to other units both of the National Park System and other public lands, just what does "appropriate toilets" mean DWGNRA? It is safe to assume that the addition of any composting or other simple toilet facilities in the NR will come under close scrutiny.

Pg. 20, 24 Under Operations, Partnerships and Cooperative Actions the plan states: "A new office would be created in the park to manage the trails system." Given the park's history of limited resources and budget cuts, what degree of certainty does the park have for securing and sustaining funds to increase staffing levels?

Pg. 21, 24 The plan suggests: "A volunteer trail patrol program would be initiated, similar to the ridgerunner program on the Appalachian Trail." We have found this program to be a wonderful tool to educate and inform users and to mitigate resource damage caused by inappropriate use. The A.T. program has been funded through grants from the Commonwealth of Pennsylvania, the State of New Jersey, The A.T. Trail clubs that help cooperatively manage the program and the Appalachian Trail Conference. Would DWGNRA consider an assumption of some of the financial burden of this A.T. program, where Ridgerunners currently patrol 27 miles of the most heavily used trail in the park?

Pg. 25 Under the second mission goal's management prescription the plan states: "Appropriate numbers of trails and facilities consistent with visitor use are available and accessible." How will these "appropriate numbers" be determined? What type of carrying capacity model will be implemented?

Pg. 27 Under "Improvements & Maintenance" the term "Memoranda" should be changed to "Memoranda."

Pg. 42 Under Priority II, last sentence "Improvements to the Appalachian National Scenic Trail and associated trailheads, where necessary, would also be a high priority." Can you provide us with some examples of such needed improvements?

Pg. 44, 45 Throughout Chapter 3 Affected Environment, it is clear that available data is old or non-existent (e.g. "the [soils] field work was generally done more than 20 years ago and published surveys are old" or, in the case of wetlands, "the information has not been verified by field studies" and "wetlands less than one acre in size are not shown." In the comments on fish and wildlife (pg. 46) the plan acknowledges "Important habitats for most wildlife species in the park have not been identified." How will these resources be identified and protected?

COMMENTS

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DELAWARE WATER GAP

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Pg. 47 As for Threatened and Endangered Species, the plan says, "Reports exists for two other species, bog turtles and small whorled pogonia, but the current status of each within the DWGNRA is undetermined." How will these resources be identified and protected?

Pg. 59 This table, at the top of the page 59 proposes 31 miles of trail that exceeds 16% slope for Alternative B and 25 miles for Alternative C. These are extreme slopes to maintain, particularly given the anticipated use.

Pg. 60 Under Surface Waters, Streamflow, Water Quality Alternative A, last sentence: "Any impacts currently having an adverse effect on surface waters, streamflow or water quality would continue." This is unacceptable and a plan to correct these actions should be implemented.

Pg. 51 Under Alternative C Independent Networks, "Approximately 64 miles of trails and 26 parking lots would potentially be located within 150 feet of surface water." While proximity to surface water is important, is the relationship of the proposed trail facility to the annual, five year, etc. storm event.

Pg. 84 Appendix B Trailhead Parking Area Cost Estimates There is no mention of the Appalachian Trail, the most popular hiking trail in the NRA.

Pg. 85 Appendix C Pertinent Laws and Regulations The National Trails System Act (16 USC 1241 et seq.) should be referenced.

Pg. 89 Appendix F: Economic Impacts Methodology There are excellent A.T. visitor use statistics available through the ridgerunner program.

This concludes our comments on the Draft Trails Plan, General Management Plan Amendment for the Delaware Water Gap National Recreation Area. Again, we appreciate the opportunity to provide comments on this important effort and look forward to assisting in implementing any changes or improvements to the Appalachian National Scenic Trail.

Sincerely,


Karen L. Luz
Mid-Atlantic Regional Representative

CC: Paul DeCoste, Glen Scherer, Jim Palmer, Anne Lutkenhouse, New York-New Jersey Trail Conference
Neil Sohl, Wilmington Trail Club
Thyra Speary, Vice Chair, Appalachian Trail Conference Board of Managers
Paju Underhill, Appalachian Trail Park Office
Bob Proddman, Appalachian Trail Conference

COMMENTS

TO: DELAWARE WATER GAP NATIONAL RECREATION AREA
NATIONAL PARK SERVICE, 1 RIVER ROAD, BUSHKILL, PA 18324

FROM: DELAWARE VALLEY CONSERVATION ASSOCIATION
RR 5, BOX 5432, E. STROUDSBURG, PA 18301

RE: D3013/L7617 (MGMT)

Please consider the following points regarding "Draft Trails Plan—GMP Amendment—Environmental Impact Statement, dated June 1999, pertaining to proposals for trails in the Delaware Water Gap NRA of Pennsylvania and New Jersey.

The volume of work and attention that has gone into NPS clearly and graphically setting forth the three alternatives, A, B and C, is very much in evidence and is appreciated. It is particularly hard to meet the needs of those various uses which are not always mutually compatible. And it is virtually impossible to meet the needs of all uses without considerably adversely impacting the park's natural and cultural resources.

In reviewing each of the alternatives, the Delaware Valley Conservation Association (DVCA) which formed in 1964 has spent these many years with a watchful eye upon how the Interior Department succeeds in managing its properties throughout the nation. And so our comments must be seen as—hopefully—constructive for our long-range views.

We have previously submitted lengthy statements before the Advisory Commission of DWGNRA on the issue of this park's carrying capacity and the rapidly increasing visitation statistics now at over five million persons annually. Our remarks are presented as CAUTIONARY and not as criticism. With DWGNRA one of the newest parks insofar as development is concerned, now is the time to avoid the pitfalls inherent in so many of our other national open-air facilities.

Group says national parks in trouble

WASHINGTON (AP) — Dirty air is choking the Great Smoky Mountains National Park. Deteriorating sewers are polluting the streams of Yellowstone. Historic ruins in the Chaco Culture National Historical Park in New Mexico are falling apart because of neglect and vandalism. The examples were cited Tuesday by a private parks advocacy group as examples of a national park system that is in need of billions of dollars in repairs and protection.

"Our national parks are not being protected or respected," said Thomas Kiernan, president of the National Parks and Conservation Association, as the group released a list of its 10 "most endangered parks" in the federal system of 378 parks, monuments and historical sites.

Democratic Sens. Harry Reid of Nevada and Bob Graham of Florida attended the news conference to promote legislation they have introduced that would provide \$500 million a year for parks and address outside threats to federal parks.

The park groups' 10 most endangered list cited an array of problems, including traffic congestion, air pollution, a push for wider use of motorized vehicles, poor maintenance and inadequate safeguards against vandalism and looting that have led to the destruction of historic sites. Historic artifacts often are being left to rot, rust or mildew. In some cases, the biodiversity of parks is being "undermined" by invading non-native species; and in many parks, no one knows what species actually are present, the group said.

On the list of 10 parks is Gettysburg National Military Park.

4-21-99

COMMENTS

Page 2

Continued, Delaware Valley Conservation Association Input RE: DRAFT TRAILS PLAN 6/99

NPS visitation figures of 5,000,000 visitors annually translates to an average of 13,698.63 persons daily throughout the year. That average daily number increases commensurately with the number of lost visitor days due to restrictions during arid conditions, and other extreme weather conditions. It raises the spectre of easily reaching an over-use level based upon cumulative adverse impacts from said average number of vehicles streaming into the Park day after day. Vehicular pollution is a regional plight following the terrain and atmospheric nature to be expected, especially, over river valleys of the configuration of DWGNRA. The Lehigh Valley began experiencing this problem many decades ago. Many other examples stand out.

Even with bussing alternatives, use of the private auto is at an all-time high by visitors from within a 100-mile radius of the DWGNRA, and their numbers will continue to grow if no consideration is inherent with administration of the project.

The provision of more amenities, including miles of trails, is a GREEN LIGHT beckoning more and more visitors. As the Park's use grows, the 1965 mandate to protect it continues. But public enjoyment cannot be continued once the natural resource slides into decline, whether it be air or water quality, impairment of greenery, or visitor congestion within the Park.

The issue of DWGNRA LIMITS TO GROWTH were under study by Beth Johnson before her departure some years ago. It is a matter of real concern in parks nationwide.

Page 3 following this page, shows an AP report dated August 11, 1999, on the NPS battle against air quality problems in the Great Smoky Mountains National Park, a half-million acre park which claims 10 million visitors annually. One could dismiss the comparison by virtue of the fact that this southern Appalachian park's air pollution is increased due to electric power plants, not our problem. However, there are threats of equal dimension in our DWG park due to its relatively small size, (only 14% the size of Great Smoky), its 5 million visitors, but with far less forests to absorb air pollution.

We fully realize that the stated purposes of the 1965 Act, preserving the Park's integrity while providing public recreation, can reach "cross purposes". In the past, economic success often has meant environmental degradation, and even destruction. Pressures from surrounding special interests in increasing our NRA's facilities and activities as means of drawing greater numbers of customers into their "economic catchment area" are to be expected. However, we are all well aware, and they should be reminded of the fact that WHEN ECOLOGICAL VALUES ARE COMPROMISED, ECONOMIC GAINS DWINDLE. There are other places to go.

Regarding the Trail Plans and noting on page 49, "The DWGNRA contains the premier prehistoric and contact period archaeological sites in the Mid-Atlantic States", an Environmental Impact Statement on these proposed Trails is obligated to go into more than trail widths and vertical clearance, but must also reveal what trail sub-surface work is projected, how deep will sub-surface preparation go, and how deep "compacted base soil or gravel". How deep drainage ditches will be and what other subsurface preparation is inevitable?

LASTLY, what is the projected increase in visitation for alternatives A, B, and C? and what security is envisioned to reasonably assure safety for those who use the trails?

Thank you for the opportunity to comment, and for the best of human judgements to be made for the posterity of this naturally beautiful DWGNRA and its longterm preservation.

DELAWARE VALLEY CONSERVATION ASSN.
Nancy Shukaitis, President

Nancy Shukaitis

9-27-99

COMMENTS

COMMENTS

DELAWARE WATER GAP



IN REPLY REFER TO:

United States Department of the Interior

DELAWARE WATER GAP NATIONAL RECREATION AREA
CITIZENS ADVISORY COMMISSION

P.O. Box 284
Bushkill, Pennsylvania 18324

717-588-2435

A1815/D3013 (CAC)

October 4, 1999

Memorandum

To: Superintendent, DEWA

From: Dick Gross, CAC

Subject: Trails Plan Comments

My comments and recommendations concerning the June 1999, draft trails report are as follows:

Alternatives

I recommend either an expansion of alternative A to include the following, or a new Alternative D. Alternative B includes too many unnecessary trail proposals and Alternative C does not include two excellent trail proposals in New Jersey: County Road Trail and the Woods Road Trails, identified in B. Either of these two trails could eliminate some of the extra use and impact presently found on the Appalachian Trail.

Following are a number of notes regarding the draft report:

- I believe you need to identify the difference between a hiker and a walker. Many of the old roads found in DEWA are heavily utilized by walkers. Hikers, I feel, are looking more for the solitude, nature appreciation, and remoteness associated with the term "hiking". Walkers, who dominate at DEWA, may look for similar things, but not on the same scale as the hiker.
- There has to be a better explanation and discussion on recreation use conflicts. Probably the most important conflict would be between hikers/walkers and hunting; however, most hiking use decreases as hunting use increases in the field. So this may not be as serious problem as it could be. If anyone was present between November and February, they would observe that about 90% of use at DEWA is hunting.
- Trails report needs to deal better with coordination between state and municipal government agencies since several of the trails at DEWA include portions outside the NRA boundary.
- page iii - please, let's get our statistics straight - DEWA includes 72,000 acres in its boundary of which approximately 56,000 are in Federal ownership. Where did 65,000 acres come from?

Page 2

- This report should stress that DEWA is a national recreation area, not a park. I know this is difficult for NPS people to understand, but let's try. DEWA is a product of the ORRRC recommendations!
- pg. 5 - expand statement on conflicts among user groups (trials for horses, hikers, etc.)
- pg. 8 - I fail to see jogging as a resource recreation pursuit.
- pg. 10 - shouldn't PEEC be included as a trails partner?
- pg. 14 - I have problems with some of the trail widths (copy attached).
- pg. 18 - primary mission goal should be: providing outdoor recreation use. Second goal can be preservation, etc (copy attached)
- pg. 19 - remember, all of Old Mine Road is an acknowledged bike trail
- pg. 53 - Visitation I seriously question the figure in Table 3, 180,925 hikers. Most are walkers, not true hikers. Also, hunting figure is for 1987 - I am sure this figure has increased at least 50% since then.
- pg. 71-75 - I seriously question the reliability of some of this info such as Table 6: 1) 500 horse days (I am sure this is almost entirely local use); 2) my experience has been that very few hikers and bikers remain in this area overnight or use eating places (there are only a very few to begin with); 3) all this, particularly 8, 9, and 10, are highly speculative - reason - only one campground and few facilities exist within the boundary, etc.

Alternative (PA) Comments and Recommendations

All of McDade Trail - Okay, except as follows:

1. Between River Road and Bushkill Creek - utilize part or all of the Hogback
2. Need a connection to trail from Dingmans Campground (desperately!)
3. Should eventually extend north through Milford to DEWA boundary for hook up with Kittatinny Campground at Cummins Creek.
4. Trailhead is needed: Dingmans Creek (209), PEEC Road.

Eshback Trails

1. Revise to include Toms Creek Trail from picnic ground trailhead to Egypt Mills Pond then to Stuki Pond, down to Eshback Trail head on McDade Trail and return to Toms Creek trailhead. Remainder of area has enough roads for people to walk if they want. May keep connection to PEEC trails. Egypt Mills Road and road for Stuki Pond to remain open for this important hunting and fishing area.
2. Eliminate lower and upper Eshback trailheads (where is access from road?)
3. Trailheads at Toms Creek, Stuki Pond and Eshback are sufficient.
4. Excellent parking area present at Stuki Pond (not shown on Alt. A. map).

PEEC Trails

1. Fine as they are, but needs a spur to connect with McDade Trail and Eshback Trail.
2. Also a trailhead and parking area near but not at PEEC headquarters.
3. How much of the PEEC trails system is not located in the 67 acres transferred to PEEC? Where is the trailhead for this system?
4. Might consider a spur to Hornbecks Trail and Indian Ladder Falls, thereby contributing to a circular trail via the McDade Trail back to PEEC.

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Page 3

5. Definitely no trail link past Hornbecks Creek trail to Dingmans trail or to Loch Lomond. It is unnecessary to clutter this section with trails. Leave as is.

Hornbecks

Leave as is except possible hook up with PEEC system.

Dingmans

1. Urgent hookup spur with Dingmans Campground.
2. Consider extension of and future hookup with state trails in Delaware State Forest.

Bride and Groom

Disregard this as a system. Existing roads will be there for walkers. Important hunting area does not need designation as a trail.

Adams Creek Trail

Leave as is.

Conashaugh View

1. Leave as is for horses and whatever.
2. Do not close Conashaugh Road to vehicle traffic.
3. Put a trailhead parking at lower end of Zimmermann Road (near the gate), thereby utilizing all of the old Zimmermann Road between the gates which is an important birding site.
4. Leave Sproul Road as is. There will be enough traffic to keep vegetation down, and continue the road as a good walkway.

Raymondskill Creek Trail

1. Link with McDade Trail, but only to Raymondskill trailhead.
2. Make parking area on 001 for access to Hackers Falls.
3. Continue road for walking between 001 and Hackers Falls.

Cliff Park Trail

1. Include in the trail package. Importance of this trail could eventually be a link with Pike County park Trails and Delaware State Forest Trails.
2. Need some overnight facilities if above becomes reality.

Trails Plan (NJ)

Catfish Pond (Mohican)

1. Copper Mine Trail to Camp Road via Rattlesnake Swamp, ok. Trail to link with Van Campen Glen Trail at Millbrook, hence south to another link to Coppermine Trailhead. This would be a circular trail of X number of miles and could afford to take some pressure off the AT. Overnight camping facilities would be necessary on this loop trail.
2. Locate a hawk watching site reasonably close to the Millbrook Road near Rattlesnake Swamp trailhead.

DELAWARE WATER GAP

COMMENTS

Page 4

Pioneer/Hamilton

Leave as is.

Pool Colony

Eliminate as a trail system but leave existing roads available for walkers. All of Kittatinny Mountain top is prime deer and turkey hunting as well as walker's paradise. Old road (Pool Colony and Blue Mountain Lake Trails are extensively used by hunters, fisherman, nature lovers birders, and walkers.

Blue Mountain Trails System

1. This system is fine as is until DEWA develops a picnic, boat launch, etc., as called for in the GMP at Lower Blue Mountain Lake.
2. Value of system is increased because of hookups with Stokes State Forest and other trails. This system, if utilized properly, should take some pressure off the AT, but still provide hookups with AT.
3. Needs spur hookup with proposed Country Road Trail.
4. Needs overnight camping facilities.
5. Continue Woods Road Trail (Farmers Trace?) to hook up with trail in Stokes State Forest. Trailhead could be established in Stokes. I don't understand where Farmers Trace comes from.

Loop Trail, Crater Lake

Okay, keep as is, but enlarge parking areas.

Mountain Road Trails (B)

Eliminate as a potential trail. This is a vehicle road frequently used by resource recreationers. There are several parking lots maintained by DEWA and New Jersey for those who wish to walk on adjacent woods roads.

Walpack Environmental Education Center

Continue present trail system the Walpack Center uses.

County Road Trail (B)

1. This is an excellent proposal for hiking and cross country skiing.
2. This proposed trail would be located in some areas that are extensively hunted; however with proper management I can see no problems. Development of the trail would include a number of new parking locations which are always needed.
3. A parking lot is present now at the intersection of Old Mine Road and Old U.S. 206. Keep it.
4. A parking lot will be necessary somewhere on the old Buczeck Farm that would also provide car top boat access to the Delaware River.

Dick

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Recreation and Leisure
Services Management
Department

September 30, 1999

William Laitner, Superintendent
Delaware Water Gap National Recreation Area
National Park Service
Bushkill, PA 18324



Re: Public Comments - Draft Trails Plan, General Management Plan
Amendment, Environmental Impact Statement, dated June 1999.

Chapter 1 -

- P. 3
 - Among the recreation resources mentioned, the opportunity of driving for pleasure on scenic park roads could be included. Camping should also include mention of designated campgrounds. Since hiking and backpacking may imply different experience opportunities for visitors, the term "backpacking" should be added.
 - Throughout the document there needs to be more clarity in distinguishing between "bicycle touring" (paved road or paved trail bicycling) and "mountain biking". These two activities are inherently different: 1) the bicycles are different, 2) the nature of the activity is different and 3) the expectations of the visitor for the experience and the facilities are different. The park apparently intends to provide for both, but at times the document does not clearly state this.
 - Under the list of purposes I would like to see "Education and interpretation", with the text to read "Foster preservation, education, and interpretation activities...."
- P. 6-8
 - Mission Goals do not match the park mission goals listed on p. 4. Perhaps the entire goal statement should be repeated.
- P. 7
 - In reference to the PA Recreation Plan, do the percentages of respondents indicate statewide respondents or just those of the 3 counties mentioned? This is not clear.
- P. 8
 - Does "snow skiing" refer to downhill skiing, cross country skiing or both?



IN REPLY REFER TO:

United States Department of the Interior

NATIONAL PARK SERVICE
Delaware Water Gap National Recreation Area
Bushkill, Pennsylvania 18324



D3013/L7617 (MGMT)

November 22, 1999

Dr. Elaine Rogers
East Stroudsburg University
200 Prospect Street
East Stroudsburg, PA 18301-2999

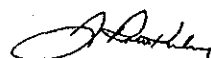
Dear Dr. Rogers:

Thank you for your comments regarding the Delaware Water Gap National Recreation Area Trails Plan/General Management Plan Amendment/Environmental Impact Statement. The majority of the public comments were in favor of Alternative B. Accordingly, the Trail Plan will reflect that preference with some slight modifications.

The United States Fish and Wildlife Service and the State Historic Preservation Officers were informed of the park's intention to pursue an Environmental Impact Statement. The appropriate levels of consultation have been completed and comments from those agencies are included in the Final Trails Plan/Environmental Impact Statement. As new trail alignments are considered, the appropriate agencies will review the site-specific information and provide comments and concurrence where necessary.

If you have any questions, please give me a call at (570) 588-2418.

Sincerely,


William G. Laitner
Superintendent

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Chapter 2 –

- P. 13
 - It is not clear how the evaluation criteria were applied. Must all trails meet all the criteria? Are trails ranked or is proposed trail construction or improvement prioritized according to the criteria? What is the source of these criteria?
- P. 14
 - The sources of these design guidelines should be noted or cited in the reference list. Design guidelines for ADA-compliant trails should perhaps also be included.
 - Col. 3 – What was the date of Directors Order 2?
- P. 20
 - Would not resource protection, maintenance, and interpretation also be increased to handle the additional responsibilities to these divisions that Alternative B would require?
- P. 21
 - The term "volunteer trail patrol" should perhaps be replaced with "volunteer trail monitor" to be consistent with similar programs elsewhere. This is an excellent idea!
- P. 22
 - I would like to see also as an appropriate action: "Approve and fund increases in staff for resource monitoring, resource protection and interpretation".

Overall – I support the selection of Alternative B as the park's preferred alternative for the following reasons:

- 1) The momentum is already underway for regional greenway, trails and open space enhancements in the regional area surrounding the park. Trail linkages will integrate park visitor opportunities with efforts already underway by local and state governments and NGO's surrounding the park.
- 2) Linking trails within the park is highly desirable to maximize park visitor opportunities.
- 3) This alternative provides better coordination with the park's Interpretive Plan, already being implemented. Linking networks provide for coordination with the park's interpretive themes.

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- 4) This alternative maximizes the potential for trail development for the greatest diversity of trail uses.
- 5) The disadvantage of Alternative A is that "No Action" continues the present lack of a coordinated system approach to trail management. This is unacceptable.
- 6) The disadvantage of Alternative C is that it provides too many networks and would be confusing to the park visitor. It also does not lend itself to coordination with the park's Interpretive Plan as well as Alternative B.

Chapter 3 -

- P. 53
 - Is there no data on trail use by cross country skiers or snowmobilers?

Chapter 4

- P. 55
 - Is the "Wilderness Act" pertinent to this park?
- P. 61
 - There are alternatives to piling construction of boardwalks in wetlands that have been shown to have less environmental impact during and after construction.
- P. 64
 - Re: Bald Eagle - Is it necessary to infringe on the 400-meter buffer? As described on p. 47, the eagles need freedom from human disturbance. Additionally, why is consultation with the U.S. Fish and Wildlife Service "informal" vs. "formal"? Doesn't the USFWS have to be "formally" a part of the NEPA process for threatened or endangered species? It would seem that the 9.25 miles of the McDade Trail that is currently planned within the 400-meter buffer needs further review. If that portion, or those portions, can be relocated outside the buffer, this should be considered. The McDade Trail is considered multi-use and will no doubt receive increased winter use of allowed uses once constructed, thus impacting the eagles during their most vulnerable time of the year, as described on p. 64, column 1.

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- P. 66
 - Again, why "informal" vs. "formal" consultation with the USFWS concerning a threatened or endangered species?
- P. 68
 - Alternative B: I would like to see the last sentence extended to read "...of sites through an increased emphasis on interpretive programs about these resources".
 - Column 3: The concept of "unavoidably lost" strikes me as odd in this plan. It would seem we have the obligation and opportunity to avoid the loss of these and other resources by virtue of this planning process. That is by nature the entire point of planning – to foresee the consequences of proposed actions and to avoid all possible actions having adverse consequences such as the irreversible loss of significant archeological resources. I would anticipate that the NPS would be responsible to the extent that if archeological sites are known or discovered during the planning of any specific trail that the trail would be re-routed or scrapped altogether. That choice does exist.

Respectfully submitted by S. Elaine Rogers, Professor and Department Chair,
Recreation and Leisure Services Management

WILLIAM LAITNER DOCUMENT.WORD

RESPONSIBLE FOR 1,200 MILES OF
FOOT-TRAILS, INCLUDING THE ORIGINAL
SECTION OF THE APPALACHIAN TRAIL.



MEMBER ORGANIZATIONS

- Alderbrook Mountain Club**
- Albany Chapter**
- Anacostia Chapter**
- Long Island Chapter**
- Mad-Hudson Chapter**
- Melrose Chapter**
- New York Chapter**
- North Jersey Chapter**
- Pennapa Chapter**
- Schenectady Chapter**
- Advisors for Women**
- Appalachian Mountains Club**
- Dutchess Valley Chapter**
- Montark-Hudson Chapter**
- Midland Outdoor Center**
- New York State Chapter**
- NY-NJ-Rhode Island Club**
- Arkansas Club of South Jersey**
- Bay Scouts of America**
- Boston Council**

Lanham Lodge, C.A.
Cerro Wyckoff Conservation
Caribbean Free Press Mt. Team
Catskill Branch of School
Catskill Center
Catskill 3590 Club
Chenoweth Mountain Club of NY
Country Doctor New York
Cranebrook Association
EMMS/Westridge
Finger Lakes Trail Conference
First Rock Brook Hall and Association
Folk Music Society of New York
Friends of H.S. of Environmental Sci.
Friends of the Shawangunks
Friends of Saw Mtn Bar
Front Valley Tenabokues
German-American Mt. Hiking Club
Hudson Mountain Club/NY Section
of River Walkers Assoc.

[illegible]

September 27, 1999

Superintendent
Delaware Water Gap
National Recreation Area
1 River Road
Bushkill, PA 18324



232 Madison Avenue • New York, NY 10016 • (212) 685-9699
nynjlc@aol.com • www.nynjlc.org

RE: Draft Trails Plan/General Management Plan
Amendment/Environmental Impact Statement

Dear Superintendent Laitner,

Thank you for the opportunity to respond to the Draft Trails Plan for the Delaware Water Gap National Recreation Area (DWGNRA). The New York-New Jersey Trail Conference, a volunteer-based organization building and maintaining hiking trails in northern New Jersey and southern New York since 1920, is very interested in the development of a Trails Plan for the Delaware Water Gap. Our comments encompass our two roles within the Recreation Area : that of a cooperating management partner for the Appalachian National Scenic Trail, and of a volunteer, trail partner organization maintaining hiking trails in addition to the AT. Since this organization is active only in New Jersey, the following comments pertain only to the proposals for the New Jersey district.

The Trail Conference commends the National Park Service for its quick response to extend the public comment period (from August 24 to October 5, 1999) based upon strong recommendations from, among others, the NY-NJ Trail Conference at the first public workshop held on August 10.

The Trail Conference concurs with the six trail system goals for the DWGNRA as outlined in this draft Trails Plan (page 3). We understand your mandate to provide recreation, and appreciate the efforts made to enhance the trail systems.

The NY-NJ Trail Conference opposes Alternative B because of inadequate protections for the Appalachian National Scenic Trail. Regardless of which proposed or to-be-proposed alternative of a Trails Plan is selected, the Trail Conference is extremely concerned about any plan which would vastly increase both numbers of visitors and new mileage opened for recreation without first initiating a comprehensive discussion of the critical accompanying management plan for enforcement and education. Our experience in New Jersey shows that, without a management plan that can be implemented by park personnel in sufficient numbers, increasing multi-use opportunities will result in an increase of concurrent trail user conflicts and resource damage. The Trail Conference is



IN REPLY REFER TO:

(342)

November 15, 1999

United States Department of the Interior

NATIONAL PARK SERVICE
Delaware Water Gap National Recreation Area
Bushkill, Pennsylvania 18324



JoAnn Dolan, Executive Director
New York-New Jersey Trail Conference
232 Madison Avenue,
New York, New York 10016

Dear Ms. Dolan:

Thank you for your comments regarding the Draft Trails Plan for Delaware Water Gap National Recreation Area. We recognize the importance of the Appalachian National Scenic Trail, and we are sensitive to the potential effects that the development of additional trails within the recreation area could have on the AT.

The majority of the public comments were in favor of Alternative B. Accordingly, the Trail Plan will reflect that preference, but we will make some modifications related to your concerns.

The Woods Road Trail will not be designated for bicycle use. It will remain in the plan as a hiking trail.

The Van Campens to Rattlesnake Connector Trail will not be included in the Plan.

We believe that the Farmer's Trace Trail should remain in the plan, and be designated for bicycle and equestrian use. Although that trail will be close to the AT, the ability to provide connections to Stokes State Forest is very desirable, and was supported by the State Forest Superintendent. We believe that providing an opportunity for bicycles and equestrian users, and eliminating potential connecting points to the AT (such as you described just north of Bird Mountain) will be beneficial to both the AT hikers and to other users.

We believe that the connection from Crater Lake to Hemlock Pond (the Orange Trail) must remain in the plan as a hiking trail. We agree that that is a potential access point for bicycles using the Blue Mountain Lakes Trail. However, thus far we have only seen an occasional bicyclist on that trail, and we believe that we can adequately control that activity.

We agree that management of increased visitor use and user conflicts must accompany the development of any new trails. Beginning on page 19 in the Draft Trails Plan/GMP/A/EIS, there is a listing of the management prescriptions and examples of appropriate actions the park will undertake as part of the implementation of the final plan. The evolution from the conceptual Trail Plan to actual implementation will not take place quickly. As indicated on page 42 of the Draft Plan, before any new trails are developed, all of the associated concerns, such as environmental impacts, parking, sanitary facilities, maintenance, and management of visitor use will be addressed.

Pages 55-56 describe the level of analysis that was conducted for this planning process to predict impacts on the park's resources. Additional site specific surveys and studies were not conducted for this planning process. Before a new trail is developed, design and construction drawings and specifications will need to be completed. If necessary, site specific compliance will be conducted at that time.

COMMENTS

RESPONSES

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also concerned about 12-foot-wide, gravel surfaced trails from both resource degradation and philosophical perspectives. These comments are more fully detailed below.

INADEQUATE A.T. PROTECTIONS WITH PREFERRED ALTERNATIVE B

In keeping with the Congressional mandate that the Appalachian National Scenic Trail remain a foot-use only trail, adequate management must include designating trails which feed into the AT as foot-travel only. Alternative B has four "flashpoints" with multi-use access to the Appalachian Trail. For this reason, the Trail Conference opposes the proposed Alternative B's Woods Road and Farmers Trace trails because it invites mis-use, user conflict, and enforcement problems on the AT.

The proposed Woods Road Trail has three trail connections from multi-use trails to the pedestrian-only Appalachian Trail: the upper section of the Buttermilk Falls Trail; an unmarked woods road just south of the swampy area to the southwest of Rattlesnake Mountain (which road is not shown on the maps included with the draft Trails Plan); and the extension of the Woods Road Trail on the north towards the summit of Bird Mountain.

The proposed Farmers Trace Trail has one trail connection between a multi-use trail and the Appalachian Trail: an unmarked woods road extension leading directly to the AT just north of Bird Mountain summit.

The proposed extension to the Blue Mountain Lakes multi-use trail to and around Hemlock Pond has a flashpoint at the foot-only Orange Trail, directly linking a multi-use network into the pedestrian-only Appalachian Trail.

CONCERNS ABOUT PARK MANAGEMENT OF INCREASED VISITORS/ RECREATIONALISTS

The draft Trails Plan does not address the management system for increased visitors and user conflicts. Our experience in NJ indicates that conflicts will result when trails in a park are open to multi-use.

Alternative B and C show that management staffing would still be funded on a competitive basis, offering the real possibility of insufficient management personnel to handle the projected geometric increase in visitors and new mileage. The Trail Conference is gravely concerned that a draft Trails Plan may be proposed without also elucidating a comprehensive management plan to address these anticipated changes. Without this information, it is premature to assess the likely management impacts of any of the given alternatives. What assurances can the Recreation Area give that foot trails will be suitably managed under a burgeoning visitor increase as proposed in Alternative B or C?

The Trail Conference strongly recommends any change to a Trail Plan be implemented on a trial basis. Our position is supported by the fact that Alternative B would double the recreation area's overall trail mileage, increasing bicycling opportunities by 91 miles (a 14-fold increase in

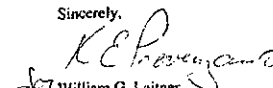
We received a considerable amount of public comment regarding the "12 foot-wide, gravel-surfaced trails". It is not our intent to build trails 12 feet wide. Our intent is to build trails suitable for multi-use, and the standard that we referred to was an eight-foot wide trail with two-foot shoulders on either side. Only the eight-foot section would be compacted and hardened, using crushed stone and natural materials, the shoulders would be cleared both to provide better sight distances and to eliminate branches and stumps that could injure a rider.

We will include reference to the NY-NJ Trail Conference on page 27 under the Blue Blaze Trail description. Regarding the Hemlock Trail, it is now included with the trail description for the Crater Lake Loop Trail, so it appears that we need to discuss with you whether or not the Trail Conference is willing to take on the additional responsibility of maintaining the entire Crater Lake Loop Trail.

The red line that you mentioned on the southern section map for Alternative B identifies the Kittatinny Point Visitor Center, not the Red Dot Trail.

We value the long-standing relationship that we have had with the New York-New Jersey Trail Conference. We look forward to working together with you to manage trails in the best way possible that will meet the mission of the National Recreation Area; to provide outdoor recreation opportunities while conserving the natural, cultural and scenic character of the area.

Sincerely,


for William G. Laitner
Superintendent

COMMENTS

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DELAWARE WATER GAP

mileage), and Alternative C would increase bicycling opportunities by 55 miles (almost a 9-fold mileage increase). In light of the Area's personnel limitations, the Trail Conference feels it prudent to recommend that whatever Trails Plan is selected, change be implemented on a trial basis. This trial status should be clearly indicated to involved user groups.

CONCERNS ABOUT RESOURCE DEGRADATION

An important trail system goal identified by the Draft Trails Plan is the promotion of "a system configuration that will minimize resource impacts". This articulated minimum-impact policy will quickly be violated if 12-foot-wide, gravel-surfaced trails requiring heavy machinery and earth-disturbing activities are built. For example, Alternative B indicates "about 35 miles of new trail would be cut, including 18 miles of multi-use trail requiring heavy machinery and earth-disturbing activities" (page 62).

The Trail Conference is concerned that this is an esthetic intrusion in the wild-ness of the Recreation Area, and "overkill" in terms of trail construction techniques. At the August 10 public workshop, Ms. Mahan-Forester stated that the 12-foot-wide proposed multi-use trails were chosen, among other reasons, to permit street bikes, and people with inappropriate footwear, onto the trails. Rather than retrofit the wilderness of the Recreation Area into an urban-type park, a vigorous Interpretive Program should be developed so urban visitors can learn how to recreate in the wild-ness. Rather than expand trails to 12-foot-widths so two-way traffic can be accommodated on multi-use trails, the Trail Conference strongly suggests that trails be designated one-way.

The Trail Conference believes that trails constructed for multiple use (such as hiking, mountain biking and equestrian use), can, with an appropriate grade, be of hardened natural soil surfaces.

The Trail Conference is troubled to read the implication, under Alternative A, that current park management can't address the need for more signs and public information (to direct visitors to less-used sections of the Recreation Area) without developing a comprehensive trails plan/amendment to the General Management Plan. We believe this type of signing and public information to be baseline park management. Therefore, any lack of it we do not feel to be an appropriate rationale for preferring one alternative over another.

At the August 10 public workshop Ms. Mahan-Forester stated that the critical, sensitive and endangered species habitat surveys were done prior to producing this draft Trails Plan. There is a statement, however, that further studies are needed to assess the cumulative impacts of using a road as a trail through a historic property then rerouting vehicular traffic to compensate, as part of Preferred Alternative B (page 67). The Trail Conference sincerely hopes that the National Park Service did not select Preferred Alternative B prematurely - given that all the necessary data to adequately analyze the potential impacts to cultural resources is admittedly incomplete.

COMMENTS

RESPONSES

FACTS CORRECTION AND CLARIFICATION NEEDED

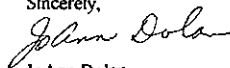
The Trail Conference would like to correct some factual errors in the draft Plan, as follows:

1. On page 10, under TRAIL PARTNERS, please note that the NY-NJ Trail Conference also maintains the Hemlock Trail in addition to the six trails already listed.
2. On page 27: the Blue Blaze Trail, within Worthington State Forest (State of NJ), is maintained by the NY-NJ Trail Conference.

On Alternative B's southern section map, the Red Dot Trail is depicted with a red line. Red is not identified on the map legend. What does the red color mean?

We thank you for your attention to these comments and issues.

Sincerely,



JoAnn Dolan
Executive Director

COMMENTS

RESPONSES

NJLITU
17 New Street
Bloomfield, N.J. 07003-3603
(973) 743-5203

August 17, 1999

William G. Laitner
Superintendent
Delaware Water Gap National Recreation Area
Bushkill, PA 18324

Dear Mr. Laitner:

It is with deep regret that I write you as coordinator of New Jerseyans for Low-Impact Trail Use concerning the trails plan and draft environmental impact statement for the Delaware Water Gap National Recreation Area. The document issued to the public is entirely deficient and without merit. Alternatives A and C were not drafted in good faith. The document is characterized by entirely baseless assumptions which bias it in favor of Alternative B. Moreover, regulatory requirements for public input have not been satisfied. Neither the document nor the public input process will stand up in a court of law. NJLITU is prepared to take legal action if any of the three current Alternatives is adopted.

Since 1997, NJLITU has advocated a bicycle-free zone on the southern Kittatinny ridge. At the initial public meetings in 1997, our input was not recorded by Ms. Mahon-Forrester, neither was the input of a participant who asked that the Recreation Area be left the way it is. Moreover, even though organizations were requested to send just one, two, or three representatives to the meetings, each participant's input was accorded equal weight, no matter how many or few people that individual represented. Subsequently, NJLITU, representing over 500 outdoor enthusiasts, requested that the current set of public meetings be conducted as formal public hearings. Our request was ignored. In the meantime, NJLITU was not notified of the EIS scoping sessions.

This systematic disregard for the public's desires is clear in the present document. While no users except horse groups have expressed a desire for new twelve-foot-wide crushed-gravel-surfaced roads (euphemistically styled "multiple use trails"), new and upgraded roads of that description account for 60% of the proposed miles of linear construction, and 86% of the estimated cost of linear construction, in the preferred Alternative B. This for a quarter of one percent of the users, according to the document's estimates.

Twelve-foot-wide roads are only a symptom of the document's adversity to the goals of outdoor enthusiasts. Exclusion of public input from the EIS scoping process is reflected in the utter failure to recognize the Recreation Area's most valuable resource - the extensive, isolated forests of the Kittatinny ridge, only two hours from New York City and Philadelphia. According to Ms. Mahon-Forrester at the August 10th public meeting, the NPS wants people to be able to come from the "city" and enjoy the Recreation Area without fear of getting lost, not having a bathroom, or experiencing any other aspect of an isolated forest. Thus every trailhead appears destined to have bathrooms, and the "ten-speed bicycles" which she envisions on the twelve-foot-wide roads appear to be, in this context, narrow-tired road bikes.



IN REPLY REFER TO:

United States Department of the Interior

NATIONAL PARK SERVICE
Delaware Water Gap National Recreation Area
Bushkill, Pennsylvania 18324



D3013/L7617 (MGMT)

November 19, 1999

Mr. Bob Moss
NJLITU
17 New Street
Bloomfield NJ 07003-3603

Dear Mr. Moss:

Thank you for your letters of August 17 and September 1, 1999, with comments on the Delaware Water Gap National Recreation Area (DWGNRA) Trails Plan/General Management Plan Amendment/Environmental Impact Statement (GMPA/EIS). The majority of the public comments were in favor of Alternative B. Accordingly, the Trails Plan will reflect that preference. Some changes were made to present and proposed trails as part of the Appalachian Trail Network.

The National Environmental Policy Act of 1969 (NEPA) mandates a public input process with the development of an Environmental Impact Statement. We have met, and surpassed, all these legal requirements. Eleven public meetings were held over the last two years to capture ideas, comments and concerns on the designation of a park-wide trails system. Additional meetings were held with county planning directors, state agencies and cooperating organizations. Hundreds of comments and ideas gathered from these meetings were considered in the planning process. Letters were distributed to individuals and organizations informing them of each opportunity to participate in the planning process. Page 4 of the summary of public comments from the September 1997 meetings does contain a participant's comment to "leave it the way it is!"

Pages 6-8 describe in detail the purpose and need for the designation of a park-wide trails system. The Appalachian Trail Park Office and the Appalachian Trail Conference have acknowledged that the section of the Appalachian Trail that extends through the DWGNRA is the most heavily used of the 2,100-mile footpath. Similar areas, such as Dingmans Falls in Pennsylvania, have been impacted by overuse.

Page 12 of the Draft Trails Plan/GMPA/EIS provides a detailed description of the trails evaluation and selection process. All information that the park received whether from

COMMENTS

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Page 2

The NPS vision sounds little different from an urban park.

Leaving aside disregard for public input, the current document is still entirely deficient and without merit. A sampling of these deficiencies follows:

- Alternative A has been defined with so many deficiencies as to make it an irresponsible choice. It calls for no improvements in trails, maps or enforcement of trail use regulations. Although this option is described as a continuation of current practices, that is false. Aside from the recent major improvement of the Buttermilk Falls Trail, common sense tells us that trail relocations, better maps, and expanded ridge-runner programs (an example given on August 10) are not dependent on the construction of twelve-foot-wide roads.
- Resource inventories are presently incomplete. Common sense says that this should be done before three years are spent developing a comprehensive trails plan.
- Recreation Area trails are described as suffering from heavy use. While "heavily used" is not defined, trails on the Kittatinny ridge cannot be fairly described in this way, and the Blue Mountain Lakes bicycles trails can only be described as lightly used. I have presented detailed data on trail use on the Kittatinny ridge to park officials, but it has been ignored. In fact, only a few trails, such as those up Mount Tammany at the Water Gap, may be experiencing heavy use.
- The new trails in the preferred Alternative B are described as taking pressure off the heavily-used existing ones. Absolutely no justification is provided for this assertion, and it defies logic. The heavily used trails all have special characteristics: for example, the trails at Mount Tammany start from Interstate 80 and lead, with a relatively short hike, to a spectacular overlook. Users of such a trail are not going to drive ten miles off route 80 to walk on a twelve-foot-wide road with no view, just because the NPS built it.
- The document seeks to curry favor with the local tourist industry by projecting significant increases in visitors under Alternative B, with absolutely no justification whatever.
- The document asserts that dispersal of users will lower their impact on wildlife, again without a thread of justification; moreover, such an assertion implies no overall increase in use, contrary to the assumptions made for the benefit of the local tourist industry.

NJLJTC urges the NPS to either drop this process altogether, or go back to the beginning and do it properly, recording public input, notifying interested parties of scoping sessions, and producing three *good-faith* alternatives to present to the public.


Robert Moss

planning departments, agencies, or private citizens was considered. As individual trails are developed, site specific compliance may be required and new surveys initiated.


Various approaches to the development of alternatives were considered. The three alternatives in the Draft Trails Plan/GMPA/EIS offer a variety of experiences unique to the DWGNRA, and respond to the park's goals and public suggestions. At the March 1998 public meetings, the three alternatives were presented. Participants were asked specifically if the proposed alternatives were reasonable, distinctive and supportable. The park proceeded with the proposed alternatives following their positive response.

Alternative A (Continuation of Current Management Practices) constitutes the no-action alternative as required by NEPA. It provides a baseline of information for comparison with other alternatives. This alternative retains the management guidance of the 1987 General Management Plan. Under this alternative, the park would continue to operate without a designated trail system. It does not preclude the development of better maps, a ridge-runner program or trail relocations.

We received a considerable amount of public comment regarding the "12 foot-wide, gravel-surfaced trails". It is not our intent to build trails 12 feet wide. Our intent is to build trails suitable for multi-use, and the standard that we referred to was an eight-foot wide trail with two-foot shoulders on either side. Only the eight-foot section would be compacted and hardened, using crushed stone and natural materials, the shoulders would be cleared both to provide better sight distances and to eliminate branches and stumps that could injure a rider.

Thank you for your interest in Delaware Water Gap National Recreation Area.

Sincerely,


William G. Latimer
Superintendent

COMMENTS

COMMENTS

NJLITU
17 New Street
Bloomfield, N.J. 07003-3603
(973) 743-5203

September 1, 1999

William G. Laitner
Superintendent
Delaware Water Gap National Recreation Area
Bushkill, PA 18324

Dear Mr. Laitner:

This is an update to my letter of August 17 regarding the DWGNRA Draft Trails Plan and Environmental Impact Statement. My initial research on NEPA case law enables me to more clearly outline your legal obligations with respect to this project.

The courts have interpreted the public input requirements in 42 USC 4332 *et. al.* and the associated regulations as being a means to an end, so that even a clear deficiency in the manner of obtaining public input does not in itself invalidate an EIS. What is important is that all relevant comments from the public be carefully considered. Thus there may be no legal requirement that the public input process be repeated. However, the EIS process must thoroughly investigate *all reasonable* alternative means of meeting the agency's goal(s), and of reducing the environmental impact by modifying the goals.

The agency's goals for the trails system appear to be the promotion of "visitor safety", and "provision of high quality recreation experiences" by means of "a diversity of trails" for "a range of uses", and more educational opportunities, while protecting the park's resources and minimizing user conflicts (p. 5). (Encouraging cooperative partnerships is a subsidiary goal in that it is more a means to an end than an end itself.)

The deficiencies in the draft document in terms of these goals are legion. Preferred option B provides no information whatever on how the linked systems will improve educational opportunities in the park. It calls for improved law enforcement and maintenance, without giving a clue as to how these are linked to the introduction of a trail network. It proposes to ease impacts by diverting users from popular trails, without addressing the question of what draws visitors to popular trails to begin with.

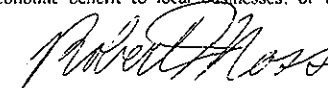
The three alternatives in the document do not begin to address the range of reasonable ways in which all or part of these goals can be met. The following outline will assist in the development of a range of alternative actions which will meet NEPA requirements.

- 1) Should the entire park be considered for the same type of development, or should different parts be candidates for different treatment? For example, should two categories be defined, developed and back-country? Developed areas would contain wider trails and more formal bathroom facilities. Backcountry sections would remain primitive. Primitive areas would provide high quality hiking, backpacking, hunting, and nature study. Back-country management might include closures or a permit system to improve safety. It

could also include closing or narrowing woods roads.

- 2) Should bicycles be restricted to wide trails? Should they be restricted from back-country sections? Bicycle access to the adjacent Worthington and Stokes State Forests must be considered, both in terms of providing long trails and, alternately, of reserving part of the Kittatinny Ridge for non-mechanical trail uses.
- 3) In general, the more the developed the park, i.e. with wide trails, more rest rooms, and more parking lots, the greater the impact. Similarly, the more uses permitted, the more impact. The goals are to certain extent contradictory, and this should be reflected in the proposals at both extremes. For example, plans featuring severe limits on bicycle access, and allowing them virtually everywhere, except the AT, must be considered.
- 4) Proposals to beef up trail maintenance, law enforcement, educational programs, maps, and signage must be divorced from proposals for specific trail networks. The two are not logically related.

While the number of combinations that can be developed from this outline is huge, not all combinations need be considered. What *must* be considered, however, is a reasonable range of proposals based, at least in part, on these considerations. Absent such a range, the EIS will fail in court. This is not to imply an absence of other serious flaws in the trails plan, such as the assumptions of increased use and economic benefit to local businesses, or the current estimates of trail use.



Robert Moss, Coordinator

COMMENTS

September 30, 1999

Superintendent
DWGNRA
1 River Road
Bushkill PA 18324

Re: Comments on the proposed Trail Development Draft Plan/Alternatives

On behalf of the Pocono Outdoor Club, approximately 100 trail users from the Pocono area, I submit to you these comments on the proposed Trail Plan Alternatives.

First, let me commend the work of those who developed the proposal-excellent job. Now, here are some of the thoughts of our Club.

In looking at Alternatives A, B, and C, suffice it to say, No way A. We agree that alternative B is the preferred option, as C lacks the connectivity desired by so many trail users. Looking back over the comments coming out of the 1997 meetings, Plan B does the job of addressing many of the key issues. Now let's tweak it.

(Some comments are additions, some changes, and some in agreement with the proposed B alternative.)

- Multiple use opens individual trails to more users, period. Good to see it. Being the 9th most visited park in the country, we have to try to accommodate a large number of users while still protecting the park's resources.
- There are not enough miles of horse trail available; this user group has been underfunded in terms of trail miles and riding options. Horses need mileage and loops, in addition to trailhead parking. Contrary to what some people believe, other users *can* coexist on horse trails. Before finalizing the plan, this needs to be addressed, and changes and additions need to be made.
- The Pocono Outdoor Club conducted a Trail use survey in early 1999, and found that hikers and bikers are the two largest user groups. And of these two groups, more than 70% of them were multiple users, both hike and bike. We would like to see even more miles open to bikes and specifically the more hard core mountain bikes. Hogsback is a great place to mountain bike, albeit a short ride, it offers a challenge and great views, yet is not even on the map. Trails closed to vehicles but still pretty much roads are great for this purpose. With proper signage, potential users could be forewarned of dangerous terrain. The ski trail system of green circle, blue square and black diamond are a great way to let people know what they're in for.
- Protection of the Appalachian Trail from other users/misuse. Good job.
- Backpacking-Overnight sites need to be incorporated into trail systems, esp. on the PA side of the river. We understand the difficulty in managing these types of facilities with

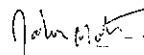
COMMENTS

such nearby road access, but the idea of backpacking a weekend from Bushkill to Milford is highly desirable. Established campsites offer the lowest impact alternative in heavily used areas like

- Folks can not be expected to know allowable uses and reasons for closures without signage. We second the motion for positive posting and encourage trail head and intersection signage to keep users informed of permitted uses, as well as current events and reasoning behind closures, temporary and permanent. And again we offer the idea of the ski trail system of green circles, blue squares and black diamonds.
- Trail names. Let's be a little more creative than say "Adams Creek to Conashaugh Link", not to mention that it's a very long name and would require a very big sign. Perhaps a trail naming workshop or name trails after a distinguishing feature or dedicated volunteer. Regarding the McDade Recreational Trail-How about River Valley Trail? It's a lot more descriptive, and McDade has his name all over the place in PA already. Do we constantly need to be reminded of the politics involved when we go to the Recreation area to escape it all? PLEASE CHANGE IT.
- Trailhead improvements/construction are needed and appear to be adequate as listed with exception. The Bushkill Visitor Center lot ought to be asphalt, not gravel. Even if only the west side is paved, it will keep the dust down and improve access to and appearance of that facility.
- While we all dream of a paid Trail Maintenance position, volunteers drive trail construction and maintenance projects across the country. Perhaps it's the lack of a coordinator under the existing conditions, but the Pocono Outdoor Club has never been approached to do any sort of maintenance or construction of trails in the park, with the exception of PEEC trails. We certainly volunteer our trail crew to build, maintain, and perhaps even adopt some of the park trails. We prefer the more natural settings to gravel road type deals. If part of the Park Trail Coordinators job will be to work with and coordinate volunteer work, good, if it won't be, then consider an additional staff person, or adding it to the Trail Coordinators duties to deal with helpful folk like us.
- Implementation of the Plan. Once it's finalized and approved, what or who's to be sure it gets done and is funded? Follow through is imperative.
- Connecting to surrounding communities. As you are probably aware, Monroe County is moving forward with Open Space development and implementation. While this proposed trail plan needs to get done, and the sooner the better, how well does it accommodate potential ties to adjacent trail systems? Leave some sort of amendment option so the trail community and adjoining areas can make additions/changes if it's desirable.

Thank you for the opportunity to provide input.

On behalf of the Pocono Outdoor Club,



John Motz,

Club Chairman

COMMENTS

COMMENTS

DELAWARE WATER GAP



August 24, 1999

Superintendent
Delaware Water Gap National Recreation Area
1 River Rd.
Bushkill, PA 18324

To Whom It May Concern:

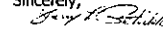
I am writing in response to the Delaware Water Gap National Recreation Area (DWGNRA) Draft Trails Plan. I did not attend one of the public workshops, but I did have the opportunity to review the Plan and Amendment.

Upon reading the material, I am personally in favor of Alternative B: Multiple Linking Networks. This is the best approach in utilizing the great qualities the DWGNRA offers. We are blessed to have such a beautiful National Recreation Area in our backyard. I strongly support trail linkages and linkages into the community. People are looking for variety and challenges. This approach would stimulate creativity on the user perspective and draw more users into the park. It would allow an increase turnover rate, enticing users to recreate on all four Networks created. I like the structure of Networks, providing different recreational, cultural, and natural opportunities. This allows the user to choose which they prefer, based upon their desires, needs, comfort level, and expectations.

I am the Trails Specialist at Wildlands Conservancy. I am working on the 180-mile Delaware and Lehigh (D&L) National Heritage Corridor Trail, establishing volunteers ("Tenders") to perform trail maintenance. Currently, this "Tender" Stewardship Program hosts 11 groups and 50 individuals. Our "Tenders" realize the importance of maintaining and preserving our precious corridor. We encourage communities to build trails linking to each other, to the 180-mile D & L Trail, and to the communities. The economic impact enhances and revitalizes our communities.

While I attended East Stroudsburg University, I spent most of my free time hiking within Delaware Water Gap. I love the trails and would love to assist in further development of more trails to broaden opportunities. One observation that I see in a lot of our Eastern U.S. trails, is the multiple use conflict. At the National Trails Symposium last fall, I learned that the East Coast is far behind in resolving this conflict, unlike the West Coast. They, with the assistance of National Organizations like IMBA, have recognized the need to work together and promote multiple use on trails. I am an avid supporter in establishing multiple-use trails for the benefit and enjoyment of all. However, I do realize designating specific recreational uses in key areas.

Please feel free to contact me at any time. I am eager to hear which approach the National Park Service will follow. Please send me a copy of the updated Plan when finished. Thank you for your time and for giving me the opportunity to offer my comments.

Sincerely,

Sherry L. Petrilek
Trails Specialist

3701 Orchid Place, Emmaus, Pennsylvania 18049-1637
610-965-4397 • Fax 610-965-7223 • www.wildlandspa.org

Wildlands Conservancy is a tax-exempt organization as provided by IRS regulations. A copy of the official registration and financial information may be obtained from the Pennsylvania Department of State by calling toll-free, within Pennsylvania, 1-800-32-0999. Registration does not imply endorsement.

COMMENTS

COMMENTS

To: Superintendent
Delaware Water Gap National Recreational Area
1 River Road
Bushkill, PA 18324

From: Jill Arbuckle

Re: DWGNRA Draft Trails Plan

Pennsylvania

I am unfamiliar with the PA side, so will not comment except to say the plans include a fair amount of new hiking trail mileage - I wonder who is going to maintain it? As far as I know, the only existing Trail Partners on the PA side are the Wilmington Hiking Club, who maintain only the AT, and AMC's Mohican Outdoor Center, who work on both sides of the river. Given that travel time from Mohican to trails in PA is minimum 1 hour each way, I doubt that Mohican can take on any more trails in PA.

What follows refers to the NJ side only.

Multi-Use Trail Design

At the Trout Hatchery hearing, in my break-out group, nobody wanted the proposed twelve-foot wide gravelled trails. Hikers, bikers and equestrians all wanted a natural compacted earth treadway, not gravel (no matter how small the gravel chips). There are also serious environmental problems: heavy equipment would be needed for construction, messing up the woods, and leaving the forest scarred, and further fragmented.

Breaking new ground for multi-use trails seems totally unnecessary to me. There are hundreds of existing woods roads, road traces, and lightly used dirt roads. Whatever mileage is desired in additional equestrian and bike trails could easily be laid out on these existing routes. Only some signage, and possibly a little work to install bridges and clear connectors would be needed.

Given the very limited participation by bikers in the trails already available, I wonder what the impetus is for the substantial extra bike mileage proposed in both Alternatives B and C? Do the individuals or clubs asking for more trails have the proven ability to take over maintenance responsibility? I very much doubt it (see comments below on Blue Mountain Lakes area). It would therefore be very desirable to put bike trails on existing dirt roads, which are largely very-low-maintenance.

Finally, as a hiker, as I must object to counting multi-use trails as part of the hiking-trail network. When bikers and horses arrive, hikers leave. The sight and sound of bicycles, or the churned-up dirt and excrement left by horses, make the purpose of a hike - quiet enjoyment of natural surroundings - impossible. Hikers respect the need of bikers and equestrians for their version of outdoor enjoyment, but on separate trails. The initial few hundred yards out of the parking lot may need to be shared; thereafter the trails should be signed for a single use, should where possible be out of sight and earshot of other trails, and should intersect with other-usage trails as little as possible, to minimise unauthorised usage.

Trail Construction

The experienced trail workers present at the Trout Hatchery hearing, including myself, were appalled by the cost estimates in the draft, eg \$32,100 per mile for new construction of a natural surface trail (tables 17 and 18, p. 87). In the NY-NJ Trail Conference and in AMC we are accustomed to having volunteers build high-standard trails for zero labor costs, and perhaps a few hundred dollars for lumber and other supplies. Why would the DWGNRA wait ~~among~~ for large sums to be budgeted, when free expertise and labor are immediately available?

The equestrians present also said they work for free, including using their horses to pack in heavy supplies such as lumber for bridges. Using horses rather than heavy machinery would minimise damage as well as cost.

Save the money from construction, and invest the capital instead in maps and brochures (the \$5000 estimate in Table 16, p. 87 is way too low), and in trail signs, wayside exhibits/trailhead bulletin boards (again, the \$10,000 estimate in Table 16 is way, way too low)

Signage

The kind of signage to be used is not discussed in the Plan. The only DWGNRA-installed signage I'm aware of is that in Blue Mt. Lakes, which is the now-standard carsonite post, with decals about 3 inches square indicating permitted uses.

Negative signage (eg "No motorised vehicles") gets removed, so I agree signage should be positive (eg "Hiking and XC Skiing permitted"). However from several years experience on trails signed with the carsonite posts, and talks with other user-groups encountered on these trails, I have several reservations:

1. This form of signing works only if users are clearly informed of the underlying rule: go ONLY on trails signed for your usage. This explanation would need to be prominently posted at every trailhead, of which there are probably hundreds.
2. Lacking knowledge of this basic premise, a lone biker decal is often read by bikers to mean not "hiking only" but "here's where the trail goes". Signs saying "Hiking Only" are sometimes necessary.
3. The decals are too small, and too close to the ground, to be easily read by someone mounted on a horse, or going 15 mph on a bike. They need to be twice as large, and at least 5 feet from the ground.

I would much prefer that routed wooden signs be prepared by NPS and installed to customary standards (sunk in concrete, or in a two-foot hole) by volunteers.

Protection of the Appalachian Trail

One of the Plan's stated purposes is to relieve overuse of the AT. Therefore the proposed Long Pine Road Loop and Crater Lake Loop, both partly running on the AT, should be dropped. Loops can be devised that do not impinge on the AT.

There are many woods roads not shown on the maps included in the Plan. Some of the major ones are shown on the NY-NJ Trail Conference maps. Of special importance is a branch of the Woods Road (see NYNJTC map 17) which slants uphill to meet the AT on Bird Mtn. Opening the Woods Road to biking would certainly result in bikes on the AT. This is probably the single most important objection to Alternative B

I regret that no alternative sets up another long-distance hiking trail to take

COMMENTS

COMMENTS

DELAWARE WATER GAP

some of the pressure off the AT.

Trail-Specific Comments (south to north)

a) Red Dot, Blue Blaze, Karamac

The trailheads, and most of the trails, are in Worthington State Forest (WSF). Since WSF allows no biking, the trails must of necessity stay hiking only. The WSF mileage should not be included when computing hiking-trail mileage in the DWGNRA.

b) Hamilton Ridge

The suggestion to make it a handicapped trail is excellent, since this could be achieved with minimal work - some signage, a handicapped parking slot delineated at each end, a few rough spots smoothed. But to also allow bikes is wrong - there's plenty of bike mileage elsewhere, and no wheelchair trails within miles; let the handicapped enjoy their only trail in peace.

c) Blue Mtn. Lakes

On Sunday Sept. 26th, a sunny day with low humidity and temperatures in the low seventies - perfect for outdoor recreation - I hiked from the trailhead parking lot along the west side of the lakes, past Hemlock Pond, and back on the east side. I saw not a single bike. On several steep parts of the trail I saw serious (up to a foot deep) gullying caused by water running down the trail. I saw no evidence of any trail maintenance work to prevent this erosion - there was not a single waterbar.

Thus I am concerned that NPS is over-estimating the need for bike trails, at least the shorter ones. A long-distance bike trail such as the "Country Roads" trail proposed in Alternative B might well have an enthusiastic response.

I am also concerned that the agreement by KIMBA to "rehabilitate and maintain the trail" (page 10) is more promise than performance.

d) Woods Road

From Hemlock Pond north to the Hidden Falls intersection the Woods Road is flat and wet, with numerous small seasonal streams dumping water onto the trail. Local bikers already use the trail, and it is a mess, with road-wide areas of mud/standing water. Since it's flat, water is not easily drained. Considering also the serious risk of intrusion on the AT, I suggest that opening this trail to bike usage would be a disaster.

e) Farmers Trace

This would dump bikes and horses directly into Stokes State Forest. They are very likely to make a loop by continuing a half-mile to Brinks Road and then going downhill on the road past Tillman Ravine, which is steep, twisting. Dangerous encounters with cars bound for the upper parking lot are likely. It's just not worth the risk of accidents to gain a mere 1.4 miles of horse/bike trail.

f) American Youth Hostel Trail

This is assigned to AMC MOC. Why is it dropped from both Alternatives B and C?

Alternatives

Alternatives B and C have such serious flaws that I must choose Alternative A (no action) until a plan can be prepared which is more in tune with

- a) what the terrain will support
- b) the actual needs (as opposed to demands) of existing and projected trail users (hikers, bikers, equestrians)
- c) the ability of each user-group to maintain "their" trails.

COMMENTS

August 20, 1999

Mr. William Laitner, Superintendent
Delaware Water Gap National Recreation Area
1 River Road
Dushkill, PA 18324

Dear Superintendent Laitner:

I am writing to comment on the Trails Plan (dated 6/99) for the Delaware Water Gap National Recreation Area which you and your staff presented at the August 12th informational meeting held at the Best Western Hotel in Matamoras, PA.

After carefully listening to your excellent presentation and reading the draft plan, I strongly support Alternative B, the park's preferred plan.

I lived in two different homes in Walpack Valley from 1966 to 1974 and am very familiar with the area. I frequently hike in the area to this day and greatly appreciate the beauty and history of the park on both sides of the Delaware River. The proposed Country Road Trail encompasses many of the trails I currently hike and roads I have driven on in the past.

It makes great sense to link these trails together in a comprehensive system which will provide wonderful recreational opportunities for citizens of the metropolitan area we live in.

I commend you and your staff for the thorough job you did in preparing this plan and would be happy to volunteer to work on the trails when the plan is approved and construction begins.

Please keep me informed about the Trails Plan. Thank you!

Sincerely,

Curtis W. Barry
Curtis W. Barry

COMMENTS

Mr. Kurt Bauereiss



Superintendent
Delaware Water Gap
National Recreation Area
1 River Rd

~~~~~

Dear Sir, 8/22/99  
Please leave the wilderness alone.  
If you need more trails - OK - but  
no roads - no heavy equipment.  
The people who want to walk on  
roads have plenty already available.  
Also, no multi-use trails - who  
needs pollution in the woods - let  
those people pollute private lands -  
not my woods. Sincerely Kurt Bauereiss

## COMMENTS

## COMMENTS

DELAWARE WATER GAP

DEPARTMENT  
OF DELAWARE GAP NATURAL RESOURCES  
TRIVER ROAD  
DOVER, DE 19901

Dear Sir,

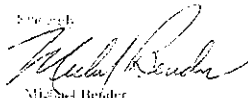
I am writing to you about our Delaware Department of Natural Resources and Environmental Control Statement. My family practices both hiking and bicycle riding and I wish to offer the following comments. Neither of these are compatible with one another! Hiking requires solitude and small groups in the and when we bicycle we need a wide or hard dirt roadways.

I would like to offer the two for a wooded area to be cleared to these bike pathways. I believe that existing woodland and overgrown roadways from the past could be wide and use about and naturally be paved for the purpose of utilizing the water gap area. However, the use of all available lands to be as these type of roads is a bad idea for the bicycling. I believe that in our care of what you have find a the the community so people like our family can enjoy them safely. They are probably the lowest cost item, however, because the infrastructure is already present and just needs upgrading. They would also be the most likely to be used and put in use by the public to use.

As far as our hiking and walking activities, our bikes, horses, etc. are not welcome at complementary areas. Hikers and walkers are forced to change the look and feel of the area. Interruptions rather than of the forest and nature, it is so nice to be able to hike and slow any children and forest habitat and wildlife without interruption and fear of being hit by a careless bicyclist.

The evergreen population will gradually form a both type of users out in present and future in our area. Our population is the same as in the past, but our needs are changing from the present to the future. I have heard of the old and wooded areas and the use of bicycle and other users. So, once a quiet forest is established it is more forever. As a bicyclist I would like to see existing pathways upgraded to safely land of the trail and to restrict users from entry of the small area. Our roads are not just for us, but for use as bicycle riding area. (DNR) they would be very cost effective because there are three already. People who drive cars for recreation have plenty of choices already. Our roads are only needed in our parks to get horses and equestrians to the trails facilities. It is my opinion that this is the best and most effective way to use our resources.

Thank You and please do not chop up any more of our wooded land.

Very truly,  
  
Michael Bender

PS PLEASE MARK TRAILS PROPERLY FOR  
TRAILER INTENDED USES.

Independent  
Dover, DE

September 16, 1991

Dear Sir,  
I am writing in response to the article in the Pike County Dispatch dated Sept. 9, 1991. I am particularly concerned with the closing of the Conasaugh Road.

I am a resident of Pike County, Singmaster, Farm, Wild Horse, and a registered owner of a vehicle with Pennsylvania license plates.

I have enjoyed traveling the road in question from RTA 205 up to Long Meadow Chapel for over 10 years and have taken my grand-children and camera with me on all occasions.

I have seen the signage for horses, hikers etc. but have yet to encounter any of the same. I am sure that they find this area as beautiful as I do and the solitude makes the area ideal.

I am sure that the present status of the road, i.e. all of us traveling in harmony can and should remain as is.

So many roads have been closed to vehicles in the past years, and I am sure for good reason, that it is difficult to gain access to many beautiful areas.

While I am writing this letter to you, I am sure that there are many others who cannot hike and bicycle and I would hope that Conasaugh Rd stay the way it is or permit handicapped vehicles the use of it.

Kevin J. Cusker

Thank You  
Kevin J. Cusker



## COMMENTS

To: Delaware Water Gap National Recreation Area Park Service  
 Re: Comments on Proposed Trail Plans and Present Trails Management  
 From: Mary C. Donofri  
 Date: August 19, 1999

Let me begin by stating I represent no special interest group and am an independent citizen concerned for the future of the DWG and its resource preservation.

### I Horse Trails

- a. I am very familiar with the general temperament of horses, which includes their "jittery" reactions. Mountain bikers flying past horses will cause most horses to rear up or break and go backwards and/or from side to side. Most horses have not been previously exposed and adjusted to mountain bikers and thus will react in a potentially uncontrollable manner. This can cause injury or death to the bikers, the rider, or a nearby hiker. Horses should never be mixed with any type of fast moving vehicle/body, not even on 12 foot wide trails. The suggestion of dividers for lanes would be ludicrous, costly, and would ruin the aesthetics for everyone.
- b. Mixing bikers and horses is a very unpleasant experience for bikers. The NJ Paulinskill rails to trails path is a prime example. No hiker enjoys to hike in manure and green flies, period. I and other hikers have had experiences with horses on trails where we have removed ourselves completely from trails, yet the on-coming horses reared and swung sideways, coming within inches of our bodies with their hooves and the attached carriages. The potential danger to human lives is not worth opening up hiking trails to horses, nor mixing the two on new or existing trails.
- c. The Present Conashaugh Trail for Horses

This previous woods road/hiking trail is now under degradation due to horses' hooves. I have personally viewed the horses kicking the waterbars out, the rider look back and continue to ride on. We had the dubious pleasure of hiking behind four horses on a July morning and were greeted for miles with manure stench and green flies. In 1998 the trails already had deeply loosened soil on the hills due to the hooves. The erosion has now, of course, worsened.

At the Wednesday morning meeting held at Bushkill, I heard three very vocal women angrily expressing their desires to have more than the 6.5 miles of new trail provided in the NPS Trail Plan. These women were told by rangers and then later announced to the public that the 6.5 miles of trails would interconnect with existing hiking trails, which was not illustrated in the Trail Plan nor was it mentioned in text, thereby extending the total trails to much more than the 6.5 stated. This appears to be a rather misleading point.

I spoke with the one woman who lives very close to PEEC and who represents the local horse club that worked on the Conashaugh Trail with NPS. She openly stated that the trails need maintenance. She continued to talk about the horse clubs not upholding their stewardship with the park. She said that although the members of the club agreed to trail maintenance before they were awarded the Conashaugh Trail for their horses, "those people did not come out to do maintenance", and "You cannot get one person out". She told us about the group of "people that come from New York City every weekend and do endurance rides, go home, and perform no maintenance". She openly stated these facts, apparently assuming I was in her corner.

## COMMENTS

Let me point out when a person acquires a horse, their purchase is not contingent on any national park land being offered for their recreational use. When they purchase a horse, they have the responsibility and understanding that they already have ample property to exercise same. Providing miles of trail to degrade with hooves and manure should not become the responsibility of any National Park. The environmental impact must take precedence over the equestrians' pleas.

Secondly, the Conashaugh area is as inappropriate an area for horses as it would be for mountain bikes, motorcycles, or anything that creates substantial degradation. They are riding up and down steep slopes and causing erosion. This type of terrain is unnecessary to ride a horse. There are beautiful, long woods roads within the park already open, wide and large open areas for trailers to park. These woods paths continue into a loop where the surface is hard packed and would be much less likely to cause the extent of damage that is being done at Conashaugh by horse hooves and their erosive nature.

This local horse club was concerned about the money that they put into building the small bridges now in place at Conashaugh. Perhaps they could remove them to other areas, or the park could reimburse them for material cost. In actuality, bikers do not need or want man-made bridges.

On page 17, last paragraph regarding partnerships, it states: The Delaware Water Gap Equestrian Advisory Committee: Partners would be encouraged to sponsor the development and maintenance of present park and proposed trails. How about replacing 'encouraged' with 'required maintenance'? This is an issue where their track record speaks for itself and park management decisions should be based.

Therefore,

- A. Close down Conashaugh to horses, as they have not upheld their stewardship and they continue to cause degradation.
  - B. The NPS should not consider multi-use trails under any plan due to potential of bodily danger.
  - C. The NPS should not use Plan B or C to interconnect pre-existing hiking/biking trails to new horse trails, due to danger, present and future degradation, and taking into consideration the horse clubs' maintenance record to date.
- II. Motorcycles

If the NPS has any serious considerations of opening up areas to motorized vehicles such as motorcycles, as stated at the Tuesday Pequest meeting, I highly recommend that you send two volunteer rangers to walk the trails of Allamuchy State Park that are used by motorcycles. Every spring they are allowed to race in Allamuchy. We can no longer use those trails for hiking at any time. The gullies are up to and beyond my knees at this point; other areas are severely muddied and/or eroded. They create unofficial 'trails', substantially widen and erode existing trails, and they do no maintenance. The motorcycle clubs feel this is 'their right to use national park land'. Above all, it is the duty of the National Park Service to PRESERVE and PROTECT.

Wildlife and plant life would be disturbed and destroyed, as well as park solitude; please, no motorcycles. New York, Pennsylvania, and New Jersey taxpayers all provide plenty of public roadway which is appropriate and ample for motorcycles -- roads and highways paved/unpaved, through towns, cities, and wooded areas -- more than they can ever ride in their life time.

Possibly these clubs throughout the tri-state area would consider using their club dues to purchase land, liability insurance, and build their own racing / riding tracks.

### III. Mountain Bikes

As with the horse trails, let the track record speak for itself. It came out at the Pequest meeting that not only are the biking clubs not doing maintenance around Blue Mountain Lakes, but they wouldn't even put up their own signage - the NPS rangers had to do it for them.

Let me also state, that as a hiker and member of several clubs, most hikers will no longer do any trail maintenance that is multi-use. We are well aware of the ratio of maintenance to damage done by groups such as cyclists, and most hikers now refuse to participate in trail maintenance on multi-use trails. I strongly urge you take that aspect into consideration when you feel you are going to be relying on volunteerism for maintenance, particularly if you intend to implement Plan B or C.

With the consideration now being given to horses, mountain bikes, and motorized vehicles, in Plan B, you state it would "provide greater opportunities for biking, cross-country skiing, and equestrian activities". Are you or are you not concerned about degradation above special-interest group appeasement? These activities will be the worst enemies of our park, particularly if they are intertwined. If you are seriously considering Plan C, and the NPS makes it well-known their pro-position of Plan B, then can you honestly state that you are following your own mission goal of "assuring that such use and enjoyment has a minimal impact on the park's natural and cultural resources"? The answer is no.

### IV. Signage

Although I had not noted a specific definition of signage, might I suggest that it be used as minimally and unobtrusively as possible. I imagine signs will be going bi-lingual, which immediately doubles the size. Hopefully, signs will be not raised in useless tribute to any particular politician.

### V. Alternative Plan C

By adopting this plan, the NPS would be making the same mistakes they've made in the past but on a grander scale by creating consolidation of groups and activities. The idea is to dissipate people, lessen impact, preserve what we have, and not alter the environment and atmosphere of the forest, meadows, woods roads, historic sites, or waterfalls, waterways, and marshes.

### VI. Alternative Plan B - the "Preferred Plan" of the NPS

The NPS Preferred Plan B states it "would double the amount of present park trail miles". Rangers have admitted the NPS cannot maintain what exists now, there are nowhere near the needed volunteers, the partnerships are not following through as required, and the ratio of promised new positions to the ratio of miles and added responsibilities is overwhelmingly out of proportion in favor of disaster. You are presently attempting to get a volunteer base established. Let's be honest, volunteers come and go and eventually the projects' maintenance fade away, falling into disrepair, substandard safety concerns arise, and eventually the inability to safely continue to use an area is prominent and lasting.

No one was able to explain how the firms listed in the Trails Plan derived their estimated figures on page 90, Table 22. I strongly doubt the numbers, all equaling an estimated 185,000 users in 1990 is nearing accuracy, and may be highly overstated to encourage NPS Preferred Plan B. Might I suggest you establish sign-in stations with registers at the present trailheads and Visitors' Centers to reach a more accurate count?

It becomes apparent starting on page 91 who will benefit the most from such park expansion and the imminent, future disaster. Specifically, future revenue to land and business owners for restaurants, delis, quick food checks, hotels, motels, gas stations, campgrounds, liveries, transportation, amusements, attractions, entertainment, sporting good stores, and other retailers. What a disgrace and outrage it

would be to buckle under pressure and sell out and destroy a national park in exchange for the big bucks to business concerns.

Preferred Plan B has not addressed safety issues. Ironically enough, safety issues were addressed for Plan A by NPS stating at the Bushkill meeting: "If any safety issues arise, they will stay as safety issues." NPS Preferred Plan B has not, but will be forced to address the issues of proposed trails crossing Route 209 in at least three areas. This can only be accomplished by walkovers built over the highway or tunnels underneath, not included in the projected \$19 million.

Also, the safety issue concerning wells was discussed. The rangers stated there are hundreds of open wells within the Park because the states have specific requirements for capping with no funds available. It wouldn't show good discretion to disperse people throughout the park with Plan B or C considering the amount of open wells in the vicinity of proposed trails.

NPS Preferred Plan B does not address the issue of increased traffic/degradation of areas such as the AT, Mt. Tammany, Mt. Minci and Sunfish Pond, as well as degradation by the horses and bikers, who have the tendency to stray from assigned trails.

NPS does not address the overall general traffic impact by implementing Plan B or C, when the usage multiplies by three or fourfold as projected.

NPS Preferred Plan B or Plan C does not address the need for paddling trails such as the navigable Flatbush. Approximately three years ago, almost all ponds were closed to paddling; the reason given was assumed to be complaints by the fishermen. Not everyone enjoys or has the ability to paddle moving current such as the Delaware. The paddling community needs consideration no matter what plan is selected for possible development.

### VI. Plan A - The Most Viable

If one must choose between the three plans, my vote goes to Plan A. As mentioned earlier, for the NPS to publicly state that if safety issues exist they will continue to exist, is ludicrous. I consider this verbiage a scare tactic against the obvious best choice, Plan A. When I questioned rangers, they shook their heads negatively stating the NPS addresses safety issues as they arise now, and will continue to address safety issues as they arise.

Plan A B, or C would need to address the issue of sanitary facilities if there is an actual increase in usage into wider ranges in the park. Facilities should be strategically located - not necessarily at every trailhead.

Consider the poor verbiage of Plan A by the NPS calling it the "Do Nothing Plan", and possibly rename it the "Sensible, Cost-Effective, Lowest Impact, Educationally-Wise Plan".

If there is a \$19 million proposal that has the potential of being funded, then the funds are also available to hire more rangers as stated in Proposal B and C. Replacing rangers which has not been done for years as well as increasing the staff, can remedy so many present problems.

a. On page 8, first full paragraph, the NPS admittedly states "Visitors are repeatedly sent to the same trail areas, causing overuse and resource degradation". Yes, the NPS has caused many of its own problems. This is easily remedied with policy changes and staff re-education to what trails are already available. I have listened to the rangers on weekends at Visitors' Centers send the people to the same old Minci, Tammany, Sunfish Pond and hand out small, paper maps accordingly. I have personally questioned rangers about specific trails, park boundary lines, etc. shown on NY/NJ Trail Conference maps, and their knowledge ranges from limited to none at times. Re-educate the rangers to ALL presently available trails. Rotate duties to get them from behind the desk and out on these trails to acquire knowledge while patrolling.

## COMMENTS

66

b. Obtain the cooperation of all hiking clubs in the tri-state area to stop leading the repetitive hikes, week after week after month. The AMC is particularly responsible for repetition of Minci and Tammany - the high impact areas. I found it interesting that on page 10 it states "Their (AMC) work is the foundation for this plan". They should know better and strive to teach such things as orienteering, low-impact outdoor activity usage, and certainly recognize the need for dispersing use by utilizing the lesser known/used trail systems in existence now, thus assisting the NPS to stop degradation. Educate all clubs utilizing the DWG to low-impact activities.

c. Learn from other park systems such as the Adirondacks: they deal with degradation by limiting parking, registering hikers, limiting group sizes. This can work and it costs nothing. The NPS has allowed overflow parking on the grass in addition to the large parking lots provided at Dunnfield/Tammany and Minci. The NPS has asked for and invited degradation, and we got it; but this trend can be reversed within Plan A.

d. On page 6 you state: "Recent concerns about potential impacts.... user conflicts and dissatisfaction with the limited number of trails and facilities...". The public is dissatisfied because they don't utilize what already exists because they don't know it exists, and they won't know it exists unless they purchase the NY/NJ Trail Conference Maps or are told by a knowledgeable ranger. If people want to responsibly utilize park facilities, then display the maps so the public realizes they must purchase them, just as they do at other parks in other states; or the DWG must make their own maps available for free or a nominal charge to cover expenses. DWG needs to educate its users and staff, and not react to public complaints by applying temporary bandages at astronomical costs both financially and with irreparable impact to historical and natural resources.

e. Development of new trail systems can be done on a truly need-be basis, and the park is far from that need in 1999. But if and when the need arises, there are established and wonderfully scenic woods roads that run across ridge lines, along creeks and lead to ponds, meadows, historical foundations, etc. These trails are now amazingly hard packed, well placed, and always lead out to main roads or other trail systems. You couldn't ask for better. All that is needed first are minimal, unobtrusive, well-placed blazes, and maps to follow. The rangers can certainly create maps to hand out at the Centers to start, and later they would be incorporated into the NY/NJ TC maps/books. Most of these existing woods roads already have large parking areas near roadways where homesteads once stood, and are currently being utilized by hunters and hikers. No further landscaping/alterations need to be done. Let people climb over logs instead of cutting them out (unless a fire road) - they're in the woods for goodness sake! These existing roads certainly fulfill your trail systems' goals of: diversity, recreational experience, educational experience with natural, cultural, and scenic features by noninfringement of park resources, are cost-effective as well as plentiful and very well-distributed throughout different areas of the park for easy access and good usage distribution. Then, again, if the people who have written these alternative plans have never bushwhacked, then, of course, they know next to nothing the DWG has to offer.

f. Page iii - iv states: Park staff would continue to direct visitors to trails associated with specific park attractions. Resources already impacted from overuse would continue to experience degradation. It is astonishing to believe the NPS would actually put such a ludicrous concept into print. The NPS is, therefore, stating the NPS has and will continue to direct the visitors to cause more degradation and will continue to do so, if Plan A, the Nonpreferred Plan is chosen.

g. The proposal appropriately states on page 5: "provide educational opportunities that offer visitors new perspectives on natural and cultural resources, understanding the importance of its story". The woods paths (aka: informal trails) are a wonderful way to allow the rangers to lead into the culture and history of the Gap, something that is being forgotten, ignored, and physically destroyed via nonpreservation of buildings/foundations due to lack of funds, which funds are miraculously surfacing for Plan B and C. Again, educate the rangers to the existing roads/trails, post minimal blazes and signage, trail modifications only as needed for environmental/historical preservation, gravel in the parking area if

## COMMENTS

required, hand-draw maps to distribute to the public, and it won't cost \$800,000 per mile of trail system. Again, this suggestion for utilization of woods roads is on a truly need-be basis, which the park is far from, since the NPS is not utilizing all of its present, recognized trails.

h. Page 17, regarding visitor use and facilities: "Visitors would continue to be dissatisfied with the limited amount of miles available for biking, equestrian use, and snowmobiling" - (aka: special interest groups that equate to a very small percentage of users). This does not correlate with the statements made at the public meetings by NPS and the statistics and comments printed in the Trail Plan about "unhappy hikers". Something is amiss here.

i. More ranger positions need to be established to interact with the public in an educational/interpretive capacity. This is a cost-effective way to disperse crowds and help eliminate overuse. Get the hiking clubs involved in volunteering in this capacity.

j. Get organizations such as the NY/NJ Trail Conference to cooperate with the NPS with regard to publishing the less-used trails and not featuring Minci/Tammany/Sunfish Pond. Copper Mine is now on its way as a highly impacted area due to the increase in publicity for Mohican, which makes the trail into a day-hike loop. Hiking clubs are routinely beating this trail. Trail usage could be monitored through registration at trailheads, also providing a safety feature to the users.

Page 8, first column, last paragraph states "Park management doesn't know which trails present the best opportunities for including in a larger system and where staff, time, and funds should be dedicated." My response to the park management is: be wary of self-serving, special interest groups on advisory boards, clubs, owners of mountain bike shops, etc. that are willing to volunteer their time to advise the park and assist in setting up trails and usage. People are unfortunately self-serving and the NPS must protect and preserve the park for ALL people to utilize without impacting the resources.

Another blatantly incorrect statement made by Helen at the Bushkill meeting was: "We have to give the public what they ask for and the public is asking for more trails." Wrong! The NPS should be functioning to protect the park as a national, natural resource for all users and preserve it for future use as a natural and historical resource. Learn from other state national parks, who are cutting back the public's privileges and uses and are not caving in to the cries of "we want, we have to have, we have the right to have". PRESERVATION BEFORE RECREATION. (This includes hiking, paddling, snowshoeing and every other activity I personally enjoy and participate in.) People must stop thinking about their own needs and work together for the preservation of the DWG. Once Plan B or C is approved and installed, we'll never be able to turn back and restore the DWG; the damage will be irreparable.

This response is already longer than I would have hoped without responding to all the points in the Trail Plan to be answered; but giving reasons for preferences or rejections is essential to understanding and accepting, as well as proposing solutions to problems.

Respectfully submitted,

Mary C. Donoff

COMMENTS

COMMENTS

DELAWARE WATER GAP

August 12, 1979

Superintendent  
Delaware Water Gap Recreation Area  
One River Rd.  
Bushkill, Pa. 18324

Dear Sir:

I am writing to advise you that I am wholeheartedly opposed to the plan to build a twelve foot wide road in a national recreation area - a most isolated forest in Northern New Jersey.

I am not able to or was not able to attend any of your meetings.

I hope you will take my comments into consideration.

Sincerely

Dee Gershwind

Superintendent  
DWM & WRA  
1 River Road  
Bushkill, PA 18324

Re: Draft Trail Plan

To Whom It May Concern,

I am an avid hiker, trail maintainer and environmentalist. I wish to ensure that the integrity of the environment and of the hiking experience be maintained to the highest standards possible. As such, I am strongly opposed to Alternative B but may support plans A or C if they keep mountain biking far away from the Appalachian trail and if they ensure that endangered species and environmentally sensitive areas of the DWM & WRA are protected. To do this, it seems imperative that an environmental survey of the entire DWM & WRA be conducted before a trail plan is adopted.

Thank you for your time and consideration.

Susan Grossman

## COMMENTS

October 3, 1999

Mr. William Laitner, Superintendent  
Delaware Water Gap National Recreation Area  
1 River Road  
Bushkill, PA 18324

SUBJECT: Delaware Water Gap National Recreation Area Draft Trails Plan, General Management Plan Amendment, and Environmental Impact Statement

Dear Mr. Laitner,

I have reviewed the Draft Trails Plan. I favor Alternative B, Multiple Linking Networks, and offer the following comments:

- 1) No additional connecting trails should be made to the Appalachian Trail, a National Scenic Trail, in order to maintain its "wilderness" character and to discourage other modes of travel on this footpath only trail.
- 2) A long distance backpacking trail should be developed in Pennsylvania utilizing existing trails. Camping opportunities should be allowed in designated areas. Users would be required to abide by Leave No Trace methods. Camping opportunities should also be available elsewhere in New Jersey along certain designated trails.
- 3) The trail plan indicates that partnerships will be sought in order to build and maintain the trails. Some partnerships that the National Recreation Area may wish to pursue are the Pocono Outdoor Club, Keystone Trails Association and its sixty plus member organizations, and Boy Scout Troops. In addition to partnerships with Boy Scout Troops, Scouts who need an Eagle Service Project for their Eagle Scout rank are possible resources.
- 4) Volunteers have been and will continue to be a valuable resource in making this trail plan a reality. I would recommend that a trail volunteer recognition program be established. A patch can be designed as part of the program for the volunteers that contribute various levels of hours for trail maintenance. The program can be similar to the National Forest Service. The main patch could be awarded to a volunteer upon the completion of 40 hours of service. Additional segment patches could be awarded at 100, 200, 300, 400 and 500 hour cumulative totals. This program would not only serve to encourage and recognize volunteers but serve as a promotional tool for the trail volunteer program. Patches could be awarded at a trail volunteers' day picnic. The proposed Trail Coordinator would administer the program. Additional funding costs should be added to Table 16 on page 87 for the volunteer recognition program.

## COMMENTS

Page 2

- 5) The Ridge Runner program has been very successful on the Appalachian Trail. I support the plan's proposed similar volunteer trail program.
- 6) Our experience in the KTA has revealed that a Trail name can have an impact on the trail's use and one's preconception of the trail. Unless the trail is very short, names that connote link or connector trails should be avoided. The perception is that the trail connects other longer trails and is of little value as a trail unto itself. I would recommend the following trail name changes:
  - a) The McDade Recreational Trail should be named the River Valley Trail.
  - b) The proposed Gap to Slateford trail should be named the Water Gap Trail.
  - c) The Dingmans To Hornbeck Connector Trail should be named the Cactus Ridge Trail.
  - d) The McDade to Stucki Pond Trail should be named the Stucki Pond Trail.
- 7) The trail plan should recognize other trails that pass through the park like the Appalachian Trail that extends from Georgia to Maine. One such trail is the East Coast Bike Trail. This trail traverses from Florida to Maine and follows the Old Mine Road in the Delaware Water Gap NRA. I have enclosed a copy of the Pennsylvania Bicycling Guide Map that shows the trail's location.
- 8) I concur with positive posting of trails as described in the plan. If a trail is not posted for a particular use it is closed for that use. This method assists the Rangers should prosecution of an offender be necessary.
- 9) During the planning and construction of the McDade Recreational Trail (River Valley Trail) safety concerns should be addressed where the trail will be adjacent to US RT 209. I trust that sufficient crossing signage will be provided where the trail crosses US RT 209.
- 10) I concur with the designation of the River Valley Trail for Hiking and Biking.
- 11) The development of this trail plan will require additional maintenance staff. I understand that the maintenance staff for the park has reduced from 55 people in 1989 to 49 people in 1999. During this time period additional maintenance responsibilities have increased from the upgrades at Smithfield Beach, Bushkill boat launch, Raymondskill Falls, and other areas. Table 16 on page 87 indicates that a seasonal maintenance crew of 6 people will be added. Additional fulltime maintenance staff should also be considered.
- 12) How many seasonal patrol rangers will be employed? Table 16 on page 87 does not appear to indicate an anticipated number of seasonal patrol rangers. What time period is considered seasonal?

## COMMENTS

Page 3

13) What kind of trailhead will be provided at the following locations?

- a) the northern terminus of the Country Road Trail
- b) the southern terminus of the Gap to Slateford Trail (Water Gap Trail)
- c) the northern terminus of the Cliff Park Trail
- d) the southern terminus of the McDade Recreational Trail (River Valley Trail)

14) Contrary to the description of the Kittatinny House Historic Trail on page 34, the Lake Lenape Trailhead does not have bathrooms.

15) The various trails in the Delaware Water Gap should be named separately. The map describes the area as Kittatinny House Historic Trails. Separate names should be provided as provided under the PEEC Trail system. Trails can be named Table Rock Trail, Lake Latini Loop, Fire Tower Road, and Kittatinny House Trail.

16) There appears to be an extra loop on the map for the Appalachian Trail at the southern end of the NRA.

17) On page 80, List of Recipients, the municipalities of East Stroudsburg, Stroudsburg, and Matamoras are Boroughs not Cities.

Thank you for the opportunity comment on this Draft Trails Plan. I look forward to helping make it a reality.

Sincerely,

*Wayne E. Gross*  
Wayne E. Gross

Representative at Large, Keystone Trails Association  
Editor, PA Appalachian Trail Guide  
Appalachian Trail Conference Life Member  
Vice Chairman, Pocono Outdoor Club

Enclosure

## COMMENTS



*Douglas & Linda Kay*

August 19, 1999

J. B. Scott Kirby, Asst. Supr.  
Delaware Water Gap Natl. Recreation Area  
#1 River Road  
Bushkill, Pa. 18324

Dear Mr. Kirby,

Being unable to attend the public hearing on the draft "Trails Plan," I called it up on the Internet, and have the following comments:

I favor Alternative B, Multiple Linkage. I found the suggestions in this alternative quite sensible, and the network intelligently thought out. One of my concerns at the 1997 hearing in Matamoras was that people who knew little or nothing of the park area would try to wing it from air with better plans, but it is evident that people familiar with the topographical layout and the former road infrastructure of the DWGNRA had a hand in this proposal.

Being a mountain bike aficionado who has explored many of the old roads in the park, I was also concerned that hiking purists would have their way and severely limit biking, so I advocated multiple use at the hearings. I am happy to see that someone was listening there too. And again, it was someone with an intimate knowledge of what is on the ground already, and the possibilities for incorporating existing routes into a sensible trail system that allows bikes along with pedestrians. In particular, the "Country Road Trail" concept would incorporate several routes that I suggested at the meeting (Thunder Mt., Woods Road, Donkey Corners, Blue Mt. & Hemlock Lakes), and I am strongly in favor of it, since I consider the Walpack Valley and adjoining ridges the best biking area in the park.

I suggest that the following trails are suitable for bikes and also be open to them: The Military Road, Cliff Park Trail, Catashugh View, and Cliff Road.

I understand the political pressures for underlining the McDade trail first, and the Jersey side second, so it is not too disturbed by the priorities for development, but since even the best of proposals often go underlined and ignored for too long, I trust that the DWGNRA administration will continue to tolerate sensible recreational usage by sensible visitors, especially if the uses are in keeping with the trail plan. Better yet, designate the trails for All, B now, and bring in the gravel, comfort stations and other infrastructure development as funds allow.

Sincerely,

*Doug & Linda Kay*

## COMMENTS

Kent Johnson

William Laitner, Superintendent  
Delaware Water Gap National Recreation Area  
1 River Road  
Bushkill, PA 18324

Dear Mr. Laitner,

This letter is to comment on the Draft Trails Plan for the Delaware Water Gap National Recreation Area (DWGNRA). I want to express appreciation for all the effort that has gone into the draft plan by the DWGNRA staff and the regional park planners. The Draft Trail Plan's Alternative B - Multiple Linking Networks is the best alternative given.

The plan needs a larger context within which to view the trails. For example, the prospect of linking trails within the park and also linking to other trails outside the park is a great idea. Yet there is no information on these possible links. Even trails in Worthington State Forest an area within the DWGNRA legislated boundary, do not appear in Alternative B. These additional trails are needed to understand circulation within the park.

In another context how will this trail system meet future demands? Using old roads is a good way to expand the trail system quickly. However these roads were not designed for recreational use. In the long haul new trails may serve the parks circulation pattern better.

This might seem like wild conjecture but lets assume over the next decade DWGNRA will see more backpackers, hikers and general visitors. Also let's assume the increasing congestion, noise, and air pollution along Old Mine Road leads to alternative transportation such as a shuttle bus between the Visitors Center and Millbrook Village. How well do Alternative B trails facilitate this future use?

First there is no new trail planned for backpacking. All use will continue along the Appalachian Trail(AT). If you want a weekend backcountry experience you will either have to shuttle cars yourself or hike out and back along the AT. Between the Visitors Center, Sunfish Pond, Raccoon Ridge and Millbrook Village the AT is still the only connecting route in Alternative B.

A second route from the Visitors Center to Millbrook could be built over the decade(see enclosure for route details). Hikers leaving the Gap could go out along the ridge, then follow an attractive second route along the Delaware River to return to their cars. Visitors could take the shuttle to Millbrook hike along Van Campen Glen and old farms to the Coppermines. Here they could catch the shuttle back to their parking area. Backpackers could spend one night on the AT, one on the second route and return without backtracking. The Draft Trails Plan should address these issues, if not in detail at least as possible future needs.

## COMMENTS

Finally I have some comments on individual trails

### American Youth Hostel Trail

Here we have a case where visitors could drive to lodging and hike in the same area. Alternative B takes away these trails. It requires hostel visitors to drive more miles within the park to find hiking trails. What sense does this make?

The DWGNRA has a possibility to plan trails to connect the hostel to the YMCA at Long Pine Pond and the AMC at Mohican. An inn to inn hiking experience could be developed. Visitors could leave their cars for 2-3 days and traverse the park from the river valley environment to the uplands ridges. Trip lead by a volunteer naturalist could provide an opportunity to educate park users. The closure of these trails represents a loss of an educational opportunity.

### Pioneer Trail

Alternative B eliminates the northern half of the Pioneer Trail. Granted this is a steep trail that could not be upgraded to a wide path without a large expense. Yet it leads to a great slide that could be used as an interpretative display of the DWGNRA's geologic history.

Instead of eliminating difficult trails the park should introduce a trail rating system. This would warn visitors of what to expect. After all some hikers want to challenge themselves.

The system could go something like:

- Class 1 - flat wide trail easy footing, ex. Karamac Railroad Trail
- Class 2 - hilly trail with easy footing, ex. Theune Trail
- Class 3 - hilly with rocky path, ex. Rattlesnake Trail
- Class 4 - very steep with difficult footing, ex Pioneer Trail

Thank you for the chance to comment on the trail plan.

Sincerely

*Kent Johnson*  
Kent Johnson

## COMMENTS

DELAWARE WATER GAP

September 16, 1999

Mr. William Laitner, Superintendent  
Delaware Water Gap National Recreation Area  
1 River Road  
Bushkill, PA 18324

Dear Mr. Laitner:

I have made a review of the Final Draft Trails Plan for the Delaware Water Gap National Recreation Area and I am in full support of the proposed Alternative B, Multiple Linking Networks, the preferred Alternative Plan. However, hopefully, there will not be any construction of additional \$1,000,000.00 outhouses which drew considerable criticism throughout the Nation. Excess monies spent on costly imported materials could certainly have been put to better use elsewhere. Other than that, I feel it is an excellent plan. If adopted, hopefully, implementation of the Plan will be followed through in a timely manner as there is a definite need for an additional assortment of trails in this area.

Thank you for allowing my comments.

Sincerely,

*Lorraine Healey*  
Lorraine Healey

## COMMENTS



Appalachian Mountain Club

Dear Superintendent and NPS Staff,

Congratulations are in order to you and your work, the NPS staff and others who have contributed to these models for possible trail systems. Your work is excellent.

Though these models differ greatly, I would agree that plan B is the preferable choice for being the most expansive and making greater use of the parks underused resources. As this plan will also create more opportunity for distance hiking in the DWGNRA, this should also curtail the heavy use and impact on the Appalachian Trail. It is my hope NPS will adopt this plan for those reasons alone.

I realize that plan B is not at all finalized in terms of what and how (especially where) trails are to be actually constructed. However, what is clear with plan B is that trails can carefully meet at points where vastly longer hiking distances can be achieved within the park as well as meeting recreational needs of other users. Conversely, it is my opinion that Plan C would not work due to too many looping trails which would not provide the opportunity for distance hikes.

Thank all of you at NPS for the existing plan A as well as your recent efforts to make possible expanded use and thereby appreciation of this wonderful natural resource that lies within the DWGNRA. Consideration of your work here has warranted the highest public trust.

Sincerely,

*Malcolm Jackson*  
Malcolm Jackson,  
AMC Member  
Blairtown, NJ



## COMMENTS

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Richard Katz DO

Delaware Water Gap National Recreational Area  
River Road  
Bushkill, Pa. 18324

Dear Sir or Madam:

The plan for mountain biking trails calls for an 8-ft. path with stone and an additional border on both sides. It certainly appears that no true mountain bikers have been consulted regarding their needs for trails. This extremely costly and unnecessary work would be fine for cars but is unwanted and unattractive for bicycles. The existing old roads which could be opened today with no additional funding would be more than adequate and provide recreational opportunities for the young and old alike. A person with mountain biking experience should be consulted and this would greatly reduce cost and environmental destruction of the 12-ft. roads suggested. One of the owners of the local bike stores might be a perfect choice. Mountain biking is a quiet, healthy, and environmentally responsible recreational activity and needs to be encouraged by our national and state parks. Just say no to drugs and say yes to mountain biking.

Sincerely,



(Richard Katz DO)

## COMMENTS

DINGMANS CAMPGROUND

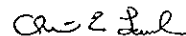
July 13, 1999

Superintendent  
Delaware Water Gap National  
Recreation Area  
1 River Road  
Bushkill, PA 18324

Dear Sir:

The Dingmans Campground supports Alternative B Trails System. We suggest a link trail be added from Dingmans Campground to the Dingmans to Hornbeck Connector Trail. There is already an existing undesignated trail which would form the link.

Sincerely,



Christopher E. Lawler

CEL:II

COMMENTS

COMMENTS

DELAWARE WATER GAP

Karen Lund

July 30, 1999

Dear Mr. J. Robert Kirby:

I support the plan to develop a trail system with four networks that would link the park's pathways with those outside the recreation area borders.

I especially would like to see as much of the new trail system as possible developed for horse use. This "Country Road Trail" has many miles of old road way which would be suitable for horse trails.

This is an area of recreational use which is currently inadequate.

I can not attend the public meetings, but I did request a copy of your plan be sent to me and I have shared it with the members and families of my 4H Club (4H Silver Bits) and with the 4H Horse Leaders Association in Warren County.

If you would like input on which areas would be safe and practical for horse use I am sure I could arrange for some people to meet with you.

I also know people who would be willing to help you develop and MAINTAIN the trail areas used by horses.

Thank you for asking for our comments. Please contact me if you wish more input about horse trails.

Sincerely,

Karen Lund

Karen and Bob Lund

## COMMENTS

Robert C. Lund

August 1, 1999

Mr. J. Robert Kirby  
Acting Superintendent  
Delaware Water Gap National Recreation Area  
# 1 River Road  
Bushkill, Pennsylvania 08324

Dear Superintendent Kirby:

Thank you for providing me with a copy of the Draft Trails Plan and for the opportunity to comment. As a resident of Warren County and one interested in preserving our local history, I am very much in favor of the National Park Service's efforts to restore the road/trail system within the Delaware Water Gap National Recreation Area (DWGNRA). I specifically support Alternative 3 (NPS preferred option) and the proposed 24.6 mile Country Road Trail.

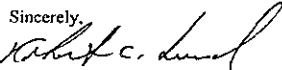
In keeping with the history of the area and the proposed restoration of historic roads such as the Columbia-Walpack Turnpike, I would encourage the NPS to consider increasing the portion of the proposed trail system that would be available for horse use. Such trails are currently at a premium and their availability would help satisfy a demand for quality trail riding recreational opportunities.

I note that though the proposed trail system would provide an additional 19 miles of trails permitting horse use, this amount is considerably less than the 98 miles proposed for biking. I suggest that hiking, biking and horseback riding need not be mutually exclusive, and I request that the NPS reexamine the proposed system with the goal of maximizing horse use opportunity.

The NPS is to be complimented on your Draft Trails Plan. If you would like to have additional input relative to the use of horses within the proposed trail network, there are a large number of "Horse People" and organizations within Warren County that would be happy to help. These same individuals and organizations would be available to assist in future trail development and maintenance programs.

Thank you again for the opportunity to review and comment on the Draft Trails Plan. If I can be of any assistance in the future, please let me know.

Sincerely,



Robert C. Lund

## COMMENTS

July 30, 1999

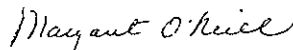
Superintendent  
Delaware Water Gap National Recreation Area  
1 River Road  
Bushkill, PA 18324

Dear Sir:

It has been brought to my attention that the NPS is planning a construction of 2.3 miles of 12-foot wide multi-use trail road north of Hemlock Pond, past Buttermilk Falls Trail and the Silver Spray trail. Also the upgrade of 2.2 miles of the Woods Road, using the same standard. This would be a huge misuse of tax dollars and bigger disturbance of this beautiful isolated forest in northern New Jersey.

I strongly urge you to drop all plans and save the forest and homes of many animals, birds and other plants. We do not need this monster of a trail. **Preserve what few isolated areas we have.**

Sincerely,



Margaret O'Neill

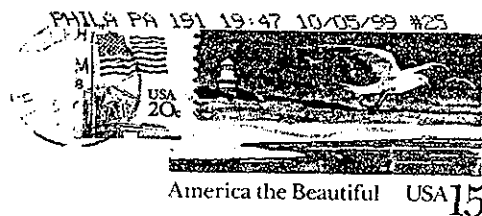
# COMMENTS

# COMMENTS

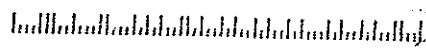
DELAWARE WATER GAP



Mr Fred Maurer



SUPERINTENDENT  
DELAWARE WATER GAP NATIONAL RECREATION AREA  
BUSH KILL PA 18324



OCT 4, 1999 FOR PUBLIC COMMENT

I HAVE READ THE DRAFT PLAN AND  
RECOMMEND PLAN B OR ACCEPTED. I  
FEEL PLAN LEADS TO NEGLECT AND PLANNING  
WILL FRACTURIZE THE AREAS AND  
BAD MANAGEMENT. PLAN A WILL GIVE  
EQUIL MANAGEMENT AND BECOME A SYSTEM  
SATIFYING OUR GOALS  
Fred Maurer



Ms. Joann Raine

Aug 6 1999

Dear Mr Superintendent:

My comments on the Draft trail management plan for the DWGNRA support the third plan. My reason is that the concentration on small and distinctive areas would discourage multi use trails. Trail linking on a large scale seems to facilitate bikes and horses moving from roads and hardened beds to hiking trails. My support would lie with the development of linking and horse trails designed for their recreation, build to support the needs of these visitors and maintained by the users.

I understand that the park's preferred plan would network all the trails and probably provide more hiker miles but the probability of abuse of ridge top and mountain side tracks by bikes & horses is increased. Hiking trails and trail heads are better served by making them more limited or by requiring users to walk in to a trail head from a general parking lot. I am a member of the Keystone Trails Association and a trail maintainer at Wind Gap - Fox Gap AT for the Batone Hiking Club and I know from first hand experience what happens to hiking trails when the multi use theory is implemented. I hope to be able to support your future plans.

Sincerely  
Joann Raine

COMMENTS

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Jerrold P. Schwartz

July 29, 1999

J. Robert Kirby  
Acting Superintendent  
National Park Service  
1 River Road  
Bushkill, PA 18324

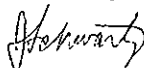
re: Draft Trail-Management Plan and Environmental-Impact  
Statement

Dear Mr. Kirby:

I would like to register my opposition to extending bicycle access and upgrading woods roads as multi-use trails in the Delaware Water Gap National Recreation Area, as called for in this plan. This area is remote and undisturbed and should be preserved in that state.

Thank you.

Sincerely,



Jerrold P. Schwartz

COMMENTS

LAW OFFICES  
I.B. SINCLAIR  
ATTORNEY AND COUNSELLOR AT LAW

*Practice Limited To Family and Matrimonial Law*  
*Fellow, American Academy of Matrimonial Lawyers*

August 6, 1999

Superintendent  
Delaware Water Gap  
1 River Road  
Bushkill, Pa. 18324

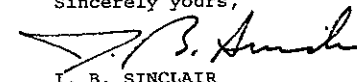
Dear Sir:

I favor Alternative B, but I have a caveat.

Horses and off road vehicles should be restricted to roads and/or trails that are specifically marked. No marking, use prohibited.

Off road vehicles, despite the name, must be kept on certain roads, if permitted at all. Full insurance coverage must be a requirement. Horses must have non-hiking trails, which their riders must maintain.

Sincerely yours,



I. B. SINCLAIR

IBS/by

## COMMENTS

August 19, 1999

J. Robert Kirby  
Delaware Water Gap National Recreation Area  
Bushkill, Pa. 18324

Dear Mr. Kirby:

I am writing in regards to the draft "Trails Plan" and will direct my comments only to the N J side as I'm more familiar with that area.

Last year I attended public meetings on proposed new trail development and heard what the public concerns were. The consensus of opinion, as I heard it, was the public wanted multi-use trails, development only on existing old roads and the retaining of natural surfaces, not paved or graveled and definately no new construction.

The draft plan, sepecially parts of B and C seems to ignore the previous public input from above. Also several proposals are suggested for development in sensitative areas, which <sup>should</sup> never be considered. Also several are in areas that would be difficult to police or of safety concerns. Safety and policing concerns were of great importance to participants at the public meetings.

### Specific areas

Silver Spray - Any new trails would direct more people into a sensitative area where safety and policing would be a problem. This area is also heavy hunting area. NO New Trail

Buttermilk Falls - Development of "restrooms" would greatly destroy the beauty of the area and could pollute the stream. Maintanance and policing would have to increase. Keep portajohns

Creater Lake - This is already a safety and policing problem because of its seclusion. Don't add to the problem

Hamilton - The old road surface is great for walking. No crushed stone needed.

Karamac - People can access by way of old railroad now. New trail would direct public to an attractive nuisance where there already has been a drowning. Safety and policing is a problem now. NO new Construction.

River Bend - This a generally sensitive area and beautiful with rhodendron. There was only a couple of driveways ever in this area. Safety and policing difficult. NO new construction.

Country Road Great Use NO new construction, use sections that are already there. Definately no crushed stone should be put on the section from Donkey Corners to Haneys Mill as this would destroy one of the nicest trails already in the park. It never was gravelled when used as a road. It seems tnat the proposed alternative "B" is being pushed to the public. Some of these cross private property at present. Existing possibilities should be considered first.

Road closures should be discussed further.

Crushed gravel or stone is expensive and not needed and not wanted in most areas. Ask any hiker and they will advise you it is extremely hard to walk on and is not handicap friendly. Use existing surface.

I recommend a combination of "A and "C" for the above reasons.

Sincerely,

Myra Snook

## COMMENTS

August 19, 1999

J. Robert Kirby  
Delaware Water Gap National Recreation Area  
Bushkill, Pa. 18324

Dear Mr. Kirby:

I am writing in regards to the draft "Trails Plan" and will direct my comments only to the N J side as I'm more familiar with that area.

Last year I attended public meetings on proposed new trail development and heard what the public concerns were. The consensus of opinion, as I heard it, was the public wanted multi-use trails, development only on existing old roads and the retaining of natural surfaces, not paved or graveled and definately no new construction.

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Sincerely,

Myra Snook

## COMMENTS

August 18, 1999

Superintendent  
Delaware Water Gap National Recreation Area  
1 River Road  
Bushkill, Pa 18324

Ref: DWGNRA Hearings- Pequest Fish Hatchery, Oxford, NJ.

Definitions: A. Trail Bike - Off Road Motorcycle  
B. Mountain Bike - Fat tired, mufti-speed Bicycle

Dear Gentlemen,

I found the Meeting of August 10, 1999 to be extremely valuable and well run. For the first time I felt that your Agency was willing to listen to our position regarding Off-Road Motorcycling as an established recreation, deserving access to the parks

I think that the meeting format which co-mingled wildly dissimilar interest groups to review the alternative plans for development, was highly effective.

As you observed, the Ridge Riders Off-Road Motorcycle Club was present in force and our collective experience was that the usual fanatic environmentalist opposition to our sport was completely absent. In its place was an atmosphere of tolerance and flexibility.

### The Plan

Alternative "C" perhaps with a selection of connectors is best adapted for development of trailbike or general "Rider" based activity. One should also recognize that we adhere to a shared use philosophy and promote the tread lightly program which welcomes any form or class of recreational use in addition to our own. Note that "shared-used" is diametrically opposed to the exclusive- use philosophy demanded by hiking groups.

Alternative "C" seems most desirable to us since it would separate the "Riding" forms of recreation which seems so objectionable to the hiking lobby and allow the hikers to enjoy exclusive use, they find so essential, in another area, with their own familiar trails.

We urge you to consider the opportunity which we favor, to expand the snowmobile area into four season use, i.e. sleds when snow cover is adequate and trail type motorcycles during the spring, summer and fall. This terrain is also attractive to mountain bikes and horses

We are prepared to deliver a complete proposal together with potential funding resources at your convenience.

I will call for a appointment to discuss these ideas more fully.

Sincerely,



Ross F. Smith

cc: E.Scott Garrett, Guy Gregg, Connie Myers, NJ State Assy

## COMMENTS

August 10, 1999

J. Robert Kirby, Acting Superintendent  
Delaware Water Gap National Recreation Area  
River Road  
Bushkill, Pa 18324

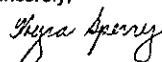
Dear Superintendent Kirby:

I am unable to attend the public workshops being held in August in reference to the Draft General Management Plan Amendment and EIS for the Delaware Water Gap National Recreational Area Trails Plan.

However, I have read the information available on the website. I would be in favor of Alternative B which would increase the present park trails miles. Since usage of the park is increasing, I think it is important to link the Park's trails with other trails outside the park. The changes you suggest in Alternative B would help save the park from further deterioration.

I hope the 32 mile River Valley Multi- Use Trail to parallel US RT 209 won't be covered with asphalt. I am a hiker and a biker and don't care to hike or ride on such a hard surface.

Sincerely,



Thyra Sperry  
Keystone Trails Association, Education Chair  
Appalachian Trail Conference- Mid-Atlantic Vice Chair

# COMMENTS

# COMMENTS

DELAWARE WATER GAP

AUGUST 10, 1997

DEAR SUPERINTENDENT,

I RIDE MY MOUNTAIN BIKE IN A REASONABLE  
MANNER ON THE BEE RIDING TRAILS IN NORTH  
NEW JERSEY, PARTICULARLY IN RINGWOOD AND LAKE  
WAWATAMA.

AS MUCH AS I ENJOY RIDING, I ALSO BELIEVE  
THAT THERE SHOULD BE A BICYCLE FREE ZONE  
IN THE DELAWARE GAP AND NORTHWOOD STATE FOREST  
AREAS. I THINK THAT THERE SHOULD BE AN  
AREA THAT IS HIKING ONLY.

THANK YOU FOR IMPROVING THE SIGNAGE AT  
SKYLANDS MANOR INDICATING WHICH TRAILS ARE FOR  
BIKES, HORSES AND HIKING

REGARDS,  
RICHARD T. STANLEY

*Rich Stanley*

August 5, 1999

Superintendent  
Delaware Water Gap  
National Recreation Area  
1 River Road  
Bushkill, PA 18324

Dear Superintendent:

As both a hiker and a biker, I am dismayed at the suggestion of an upgrade and extension of multi-use trails in our park. Enough trails already exist for us mountain bikers. To ram a roadway through the forest is a waste of time and money. Just designate the existing trails with signs so nobody gets run down. Our money would be better spent by having a few more hiking trails, particularly loops, so there would be less conflict.

Sincerely,

*Robb W. Thompson*  
Robb W. Thompson



COMMENTS.

8

8/21/99

SUPERINTENDENT,  
DELAWARE WATER GAP NATIONAL RECREATION AREA  
1 RIVER ROAD  
BUSHKILL, PA. 18324

DEAR SIR:

In my opinion, the remaining natural  
exposures of the DWGNRA should not  
be compromised by Road Improvement  
work. I understand that such work  
is proposed for a sensitive area, near  
TILMAN RAVINE. Please oppose this  
plan in favor of less invasive  
improvement projects.

Sincerely,  
Patrick D. Welsh



DELAWARE WATER GAP

COMMENTS

Richard Wolff

August 3 1999

Dear Superintendent

I am writing to tell you how opposed I am to the trail  
construction that is planned for the area from Hemlock  
Pond past the Buttermilk Falls trail and down the Silver  
Spray Falls ravine.

What you are planning to do, as I understand it, is to  
construct a 12 foot wide road with most of this covered  
with gravel. The woods road that currently exists is a  
pastoral trail. If the construction proceeds it would  
become a road suitable for automobiles better than many  
I have driven on in the Catskills.

Having gone to hearings previously having to do with more  
facilities for mountain bikers, I am well aware of what goes  
on. The instigating sources for the biker support are the  
shops that sell bikes for up to \$4000 (or has the price  
risen since last I heard?) They contact their customers  
who show up in bike helmets and wear them throughout the  
proceedings. When you officials look out over the audience  
you see an ocean of helmets with a few bareheaded hikers  
amidst them. If I were in the business of selling \$4000  
items I would do a job of organizing also.

Once Nature is destroyed it never returns. Please don't  
rape our New Jersey woodlands with even more trails for  
bikers. If they want the thrill of flying through the  
woods and down hills many downhill ski areas would be  
glad to have their business. The ski areas have modified  
their chairs to carry bikes. The bikers ride uphill and  
zoom downhill on the bikes. Isn't this enough for them?

Sincerely,

Richard Wolff

# COMMENTS

# COMMENTS

DELAWARE WATER GAP

## I SUPPORT NEW JERSEYANS FOR LOW-IMPACT TRAIL USE

I believe that hiking-only trails should be available on all public lands where general access is permitted for outdoor recreation. I believe that off-road bicycling should be conditional upon bicyclists staying on designated trails, respecting regulations and other users, and maintaining their trails to prevent widening, erosion, and other degradation.

- I support
- A bicycle-free zone in the Delaware Water Gap National Recreation Area (New Jersey section) and Worthington State Forest;
  - Clear and prominent signs at New Jersey State Park parking lots informing bicyclists that they may ride only on trails signed with a bicycle symbol;
  - Enforcement of statutes and regulations prohibiting bicycles in natural areas.

Signature

Name/address

*Richard J. Stomberg*

RICHARD J. STOMBERG

101 KIWANIS DRIVE

WAYNE, NJ 07470

*Barbara J. Stomberg*

BARBARA J. STOMBERG

101 KIWANIS DRIVE

WAYNE, NJ 07470

*Dana Balinski*

Dana Balinski

101 Kiwanis Dr

Wayne, NJ 07470

*Karen Balinski*

Karen Balinski

101 Kiwanis Dr

Wayne, NJ 07470

*Robert Lipman*



Robert Lipman  
22E Nohall  
Roseland NJ 07068-1617

NJLITU, Bob Moss, coordinator.

## E-MAIL COMMENTS

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Subject: Re: Draft Trails Plan  
Date: 10/05/1999 9:19 AM

Dear Mr. Laitner:

Please allow me to send my comments via this medium, realizing that today is the last date for comments. Mr. Kirby was kind enough to assure that I had a copy of the report - in lieu of attendance at the scheduled meetings.

As "Alternative B" is the only one identifying any trails through Montague, I am in general favor of that plan. However - I would hope, prior to any work being initiated, that somewhere I could view a map that more clearly delineates where the exact route for this trail is planned for. There are a number of old roads and trails known to locals, that your departments may or may not be familiar with. As the portrayal in the booklet was on a very small scale, I cannot translate the route to the varying level of older maps accessible to me. Some areas may just require some young trees to be cleared - and minimal clearing with a brush hog to provide access. These could be opened more readily, if funds were set aside for personnel to operate this machine on a regular basis. For instance, a number of us know that by using this machine on a few of the old roads that still show on topo maps it would open them up for immediate use - and could be a great PR intro for this! While assisting Dr.'s Crabtree and Campana this summer, some hikers passed by who complained that such roads were being allowed to get overgrown -ones that everyone is aware of who has topo maps for such use. They don't need any crush or mulch, just clearing! Some still have remnants of old macadam underneath.

I would also suggest someone from the NPS being in contact with the Montague Recreation Committee - at the township level. I have spoken to the chairman, Mike Dzirko, and he is most interested in knowing what is planned. They may be a vehicle for getting volunteers to clear brush, branches, etc.

We would also be able to identify problems and solutions, if we could have a better idea of the exact route. While your personnel have to concentrate their efforts on the entire expanse, we here have the luxury of keying in on our own backyard.

Due to family obligations that are taking up my time, I apologize for the fact that I have no further comments to offer now - having gleaned from the report just the surface facts. Nonetheless, as town historian, if alternative B gets the go-ahead - please give me a heads up and allow me to see whatever maps you have - so that more detailed and appropriate comment can be given early on and in a timely fashion.

Thank you,

Alicia Batko, Montague Historian

Subject: DWGRA  
Author: Maureen Breslin  
Date: 09/23/1999 11:38 AM

I want to cast my vote plan B. regarding the Delaware Water Gap Recreational Area. I think that a series of connecting trails with some multi-use trails is the best plan.

I also think that Mountain Biking should be considered as one of those purposes. Mountain Biker's are not the radical extremists portrayed in your plan. As with any group of people, there are all types, but for the most part people who enjoy mountain biking are mainstream, professional, responsible individuals.

Subject: dwgnra  
Date: 09/29/1999 1:39 PM

I would like to comment on the Trails Plan for the Gap.

I prefer option B.

What is important is that we using Positive signing throughout the park rather than negative signing.

As a member of the AMC group that maintains some of the trails within the Gap I look forward to this positive development.

As a trail maintainer, I would not want to be expected to maintain biking or horse trails. If a trail is designated for a specific purpose, those groups should then maintain those trails. Exceptions are the ski trails as they are typically used for hiking during non-snow periods.

Anita Brown

## E-MAIL COMMENTS

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Subject: Kittatinny Ridge Trails Plan  
Author: "C & J Canfield"  
Date: 08/01/1999 11:22 AM  
Superintendent  
Delaware Water Gap National Recreation Area

Dear Sir,

This email is in response to the Trails Management Plan for the Kittatinny Ridge. As an avid and experienced hiker, the proposed 12-foot wide road of crushed gravel does not qualify as a "multi-use trail". It is designed for biker use only. Existing trails and old woods roads provide access for all who are willing to make the effort while maintaining the natural resources of the area. There are sufficient abandoned roads which have been closed to automobiles for biker within the Delaware Water Gap National Recreation Area.

Furthermore, the scheduling of public meetings during the most popular period for vacations, including mine, can only be regarded as an attempt to reduce the opportunity for public input on this ill advised expenditure of taxpayer dollars.

Sincerely,

Carolyn Canfield

member: AMC, NY-NJ Trail Conference, Frost Valley Trail Walkers, Interstate Hiking Club, Green Mountain Club

Subject: No Subject  
Author:  
Date: 9/9/99 10:05 PM

Thank you for extending the public comment period. I am secretary of NJ Railtrails. If we can be of assistance, please let me know. I am president of Somerset County Horse and Pony Association. Please send me the contact information for the DWG Equestrian Advisory Group mentioned in the draft trails plan. Thanks.

I am a recreational trail rider. My most pleasant trail experiences are on wide, flat to moderate trails of 5 miles length or more. I have ridden the Conashaugh Trail and find it a bit strenuous for my horses. It is a good start but needs more mileage. I'd also like to see linkage with other areas of the Park. I'd love to have horse trails on the NJ side, since I am a resident of NJ. I'd like to see the old farm and logging roads throughout the park opened to horse use. These old roads have minimal environmental impact as far as erosion and are wide enough to be safe for multi-users. Please consider horse usage on any and all of the access roads you folk use to patrol the park. Of course, horse people like the nice amenities, too, but trailer parking and water for our horses is really all we need. Horses don't need new trails cut through forests or environmentally sensitive areas. We'd be very happy to ride the old farm roads to enjoy the park. Horse people will actually use trails that are long. Trails that are 1, 2 or 3 miles are not "long enough" to warrant our trailering to the park to ride. I like the idea of trails linking to other trails, as well. Please include horse use on the Country Road, Donkey's Corner, Eshback, Hamilton Ridge, McDade and Wood's Road trails. If I read the descriptions correctly, these all have old roads as a base. If Somerset County Horse & Pony Association can be of help, please let me know. We have experience within our membership with trails construction, maintenance and Trail Patrolling at the local, state and federal levels in various parks in NJ. Please let us know how we can help.

Thanks!

Susan Data-Samtak

Subject: trails  
Author: "CrazyMatt"  
Date: 09/25/1999 8:28 PM

Hi,

I'm writing to comment on the plan for making trails in the Delaware Water Gap National Rec. area. I think a series of connecting trails with some multiuse trails is a very good idea. But please do allow mountain biking there. I've been mountain biking for almost 2 years now, hiking for almost 1 and I've leaved in this area for my entire life, and I can see no reason why mountain bikes should not be allowed on the proposed new trails. As a hiker I can see why mountain bikes could be a nuisance, but hikers have the entire AT to hike on, the Delaware Water Gap has endless trails scattered all over its large area. The copper mine trails, the Dunfield Creek, the AT, Hollysprings, all over Mt. Minnercombes etc... My point being: please, at the very least seriously consider allowing mt biking on these new trails, every where we look we see no biking signs. It's nice to have some place close to get in a good ride, but too many people don't understand that mountain biking does not have a high environmental impact. Please seriously consider what I have said, and take a look at Jacobsburg State Park (Belfast, PA), this is an excellent example of a productive, functional, and working state park with a trails system that allows mountain biking... take a look at what they have done..... Go there and you will see how little of an impact mountain biking has on nature.

Thank You for your time (please seriously consider),

Matt Davis

## E-MAIL COMMENTS

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Subject: DWGNRA trails  
reply to GLDG

Thank you for the informative meetings both in New Jersey and Penna. I did submit my letter of interest at Bushkill requesting more horse trails that are longer with linkage plus increasing trailer access with water access for horses. Again, horses and bikes are willing to share trails but, please no large rocks. We wish not to ride hard top roads as motorized vehicles don't always have mindful drivers behind the wheel.

Donkey's Corner, Eshback, Hamilton Ridge, McDade and Wood's Road trail all have old roads as a base. We would also ride old farm roads and logging trails. There need not be new trails cut through forests or environmentally sensitive areas.

I wish I could hike, but years of working in an emergency room has made it difficult to submit my feet to the harshness of hiking. I understand that it is the hikers who have the most concern about horses/bikes using trails. I have yet to hear of a horse causing problems through negligence.

I would like to see both NJ and PA expand the use of the park for greater access. Again, thank you for involving the public and our many opinions.

See you again in the future.

Janice Elsishans

Subject: Hiking Only Trails  
Author: harry  
Date: 07/29/1999 9:06 AM

As a hunter and hiker in the Ringwood State Park and Stokes Forest areas, my friends and I have noticed and observed a gross degradation of the hiking trails laced through those areas. Those trails are ONLY to be used for foot access, yet tire tracks from bicycles, dirt bikes and quad runners have riddled, widened, softened, muddied and simply destroyed what once were pristine pathways.

What is needed from the NPS is strict marking and proper use enforcement over these trails. The old adage of "walk softly but carry a big stick" is truly needed to bring the age-old and great network of marked hiking trails back to their original state!.....and require that wheeled vehicles stay on their open, designated roadways as they should be. Every American wants, and should, use the outdoors to its fullest, but also must give back what they use in the form of leaving it as it was found - clean and undisturbed!!!!!!!!!!!!!!

Harry Francisco, concerned citizen

Lynn Goldthwaite

Received EIS/Trails Report at HQ

Subject: Delaware Water Gap

Re: the draft management plan to create more trails within the Delaware WaterGap:

I am opposed to the creation of more trails, as this will be disruptive to wildlife in the area. I, therefore, support the "no action" option.

Thank you.

Sincerely,

Susan Gordon

Subject: Delaware Water Gap Trail Plan  
Author: "Haertlein; Tricia [JANUS]  
Date: 07/29/1999 5:09 PM

I am sorry to be responding to you so late, but I just found out about your trails plan and request for comments. I haven't had a chance to study it in depth, but it looks very interesting with lots of possibilities. The one area I would like to bring to your attention is the lack of trails for equestrian use or trails that are multi-use which allow equestrian use. I appreciate that we have been included in your plan at all, but find, as is usual for parks plans that we are not given access to the majority of trails, even when the use would be perfectly suitable to the surface. In your plan you mention many trails that are abandoned roads or woods roads. These types of trails are already wide enough, compacted, and usually clear. Is there any reason equestrians couldn't share the trails with hikers, mountain bikers, snowmobilers, and cross country skiers? I realize they would not be suitable to share with the winter sports groups as we would break up the snow surface, but I can see no problem arising from sharing these roads with the other groups. Our preference would be to have trails that would provide at least 1-2 hours of riding (at least 5 miles at one spot). The other need would be for parking for horse trailers, so many of the road trails mentioned in the plan with access to lots and bathroom facilities would be wonderful.

As a rider and carriage driver, I can tell you we are not interested in being confrontational, we are not interested in riding on narrow hiking trails up steep banks, and we are not interested in causing unnecessary erosion. We ARE, however, interested in old road beds, farm tracks, abandoned rail lines, edges of fields and woods roads. These trails tend to be wide enough, high enough and already compacted so can enjoy the trail

## E-MAIL COMMENTS

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with little damage caused by our use.

I think you will find that with more horse access available, more equestrians (and certainly more carriage drivers) would be interested in visiting the park. For many years we were told there was no riding in the park so it ceased to be a destination of choice. When trails were opened, they were minimal in length, and it would take longer to trailer to the park than it would to ride the trail. In one of your documents you talk about 90 some miles each of hiking and biking trails and only 19 miles of horse trails - often broken into very short sections.

In one of the documents you discuss an old Dude ranch in the park. Would it be possible to dream of a place where people could horse camp? This is very popular in New York State and other areas around the country and I know of nowhere in NJ where this is possible.

Please consider allowing horses, both ridden and driven to share the wide network of abandoned roads you have listed in your trails inventory. With more trails available, I would bet more equestrians and drivers would be interested in "adopting a trail" or helping in other ways.

Tricia Haertlein

Janssen Research Foundation Clinical Research, ID/Derm/Allergy

Subject: Draft Trails Plan

Dear Superintendent:

I concur that Alternative B is the preferred alternative for the Draft Trails Plan.

BUT, please do not delude yourself into thinking that "dual use" trails between hikers and bikers will in fact take place.

Providing a hard surface to hiking-biking trails kills the wilderness experience and I think you will see any such trails abandoned by hikers. In fact, I would project greater expansion of "herd trails" in those areas, or else complete abandonment of the areas by hikers.

I have had three close calls in being hit by mountain bikers. I will not use any trail that is open to bikers.

That said, I think the "B" plan is OK, because it does give bikers a considerable amount of trails for their usage. I just hope it is intended to stop expanding trails for their usage at the proposed "B" level.

I there should be a greater effort made to improve the maintenance on hiking trails and thereby continue the wilderness experience to the maximum degree possible.

Clyde W. Hall

Chairman, Mid-Jersey Group of Appalachian Mountain Club

(This letter is a personal response to the trails plan - it has not been sanctioned by the Mid-Jersey Group members).

Subject: Trail Plan

Author: SJPON

Date: 08/21/1999 12:03 PM

I opt for plan A. The status quo. Trying to enlarge the existing trails will only take away from the reason people go to this region. Landscape architecture is only good for bureaucrats and contractors. The people and the land suffer. For example, Buttermilk Falls. The observation deck only serves as a launch pad for trash. This may not be politically correct, but everybody can't go everywhere, we all have our physical limitations.

Stanley Jermanowski

Subject: Comments on draft trail plan

Author: High Point State Park

Date: 08/12/1999 2:13 PM

In general, I'm in agreement with the draft trail plan. I agree with the choice of alternative B, the preferred alternative and the listing of implementing the McDade Trail as the highest priority. There are several places in the plan where it is stated that connections would occur with High Point and Stokes; off the Country Road Network. We are actively acquiring land to meet this goal and hope that it is a continued goal of DEWA. I also like the designation of most of these networks as multiple use. There is a great need for more equestrian and bike trails and related facilities in the area. Continued neglect of the potential for trail use in DEWA is bad idea and use will develop by itself in the wrong areas if this development isn't coordinated.

NPS should publish its own maps of the trails in order to show the detail and be consistent in scale, detail and features. Having separate maps for the various users usually creates confusion and should be avoided.

John Keator

Superintendent, High Point State Park

## E-MAIL COMMENTS

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Subject: Fwd:proposed new trails system  
Author: DEWA Superintendent  
Date: 07/22/1999 11:24 AM

Dear Sirs

As a long time resident of Monroe County, PA, I am writing you in total support of the proposal of an expanded trail system in the DWGNRA.

My family and I use the park facilities on a monthly if not weekly basis for hiking and canoeing. I feel that expanding the river view trails would offer exceptional benefits for cross country skiing as well as raptor watching in the winter and early spring months.

I have attempted to follow the river side trails above the Smithfield Beach area in the past and have had very limited success in simply spotting the signage. An upgrade is not only necessary, but it would also help to keep users in a more controlled area and thus minimize the adverse impact on the surrounding landscape.

The Delaware Water Gap National Recreation Area is a shining gem in what is becoming a billboard riddled over populated and over developed Pocono Mountain area. We desperately need family recreation in this area that does not include admission fees, water slides or souvenir shops.

Sincerely,

Mr. C. K. Krewson

Subject: Comments on plan  
Author: Glen & Donna Lippincott  
Date: 09/24/1999 10:15 AM

Dear Sirs:

I have read the publication and believe Plan B is the most desirable. It can be accomplished by civic groups, Scouts, etc.  
Glen Lippincott

Subject: Trail Plans for Del Water Gap  
Author:

Date: 09/09/1999 8:01 PM

just a quick note asking you to keep the trails as they are at the gap. It is difficult enough to maintain what you have now. more trails will also mean less quiet area for the animals.

Thanks Brian J McGrath 9/9/99

Subject: Trails Plan for the Delaware Water Gap  
Author: No Sender  
Date: 08/10/1999 10:36 AM

Comments on the draft Trails Plan for the Delaware Water Gap National Recreational Area.

I have great concern about the planned construction of a 2.3 mile 12-foot wide multi-use trail in the vicinity of Silver Spray Falls. I consider it to be "destruction" of the environment. It would be visually repugnant and make for an unpleasant walking experience. Ever try walking on the ballast of a railroad right-of-way? There is no evidence that any study has been made regarding sensitive areas and endangered species. Please leave this beautiful area in its natural state. We have so precious little as it is.

Thank you for your consideration.

Robert W. Messerschmidt

John & Dorothea Milne

Subject: Draft Trails Plan

Dear Sir:

As a member of the Pocono Outdoor Club, I would like to support the adoption of alternative B. I am primarily a hiker and I appreciate the development of link systems for longer trail experiences.

Thank you for your attention to this comment.

Janet F. Mishkin

## E-MAIL COMMENTS

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Subject: Fwd: Draft Trails Plan  
Author:  
Date: 10/04/1999 11:43 PM

Dear superintendent:

Only recently I was made aware of the draft trails plan. As a mountain bike enthusiast I was upset to learn that there were no plans to allow bicyclist in the woods. There are plans for bike paths, but not for letting people ride on unimproved trails. The difference in the experience could be compared to the difference between hiking on a smooth gravel path and hiking on a challenging part of small trail. Some people appreciate the feeling of difficulty of the hike. The feeling of accomplishment at doing something others would find to hard, or to much trouble. This type of challenging recreation is hard to come by in this part of the East coast. Housing development, shopping malls and golf courses seem to be gobbling up land quickly, and trying to find a place to take an all day ride without worrying about being hit by a car is becoming very difficult.

I was told by a ranger that there are hundreds of miles of old roads through out the park. These forgotten roads could be an excellent system of pre-disturbed trails for mountain bikes. I know that mountain bikers are a willing bunch when it comes to volunteering for trail maintenance and cleanup, and I believe could be a vital resource for the park.

I realize that there are sensitive nature areas of the park, and I am not suggesting that mountain bikers have free reign, but the park is about 40 miles long encompassing 70,000 acres. Surly there is enough room to allow for this wonderful and enriching outdoor experience without disturbing the other activities of the park. Perhaps if need be, a user fee could even be instituted to offset any problems.

Please give Mountain Biking consideration in your final plan!!

Thank you,  
Glen Nienstadt

Subject: Mountain bike trails  
Author: George P Nimmo  
Date: 07/29/1999 7:50 PM

7/29/99  
Dear sir:

I have just been informed that certain additional trails in the DWGNRA (and Stokes State Forest) are to be opened to mountain bike traffic, as well as some other "construction" of old woods roads and/or former trails for mountain bikes.

It is hard to understand the concept of "multi-use" trails from a hiker's viewpoint. After all, hikers are responsible for the very existence of most of the current trails; they also have created others and, in general, help to maintain same. Can this be said of mountain bikers?

This kind of reminds me of someone digging a trout pond over a cold spring, nurturing it, planting the proper flora, creating cover and stocking it with trout for his own fly fishing pleasure, only to learn that now every fisherman and his brother will be utilizing it and catching fish to their heart's delight with any means they feel is appropriate.

What then happens to the trout pond and the quality of the experience for which it was intended? Rapid degradation and ultimate indifference by the other fishermen to the end result. Ted Trueblood (former Conservation Editor for Field & Stream Magazine) said this: "Setting aside these areas is all well and good, but people, by sheer weight of numbers, will ultimately obliterate the very thing they seek."

The very nature and intent of trails defies political correctness - this is to be applauded. The trails exact the same toll from each of us to use them. When we attempt to appease all factions with what some might characterize as "compromises," what really is compromised? Of course, the trails, themselves, and the experience for which they were originally intended, envisioned, cut and blazed.

Now it's mountain bikes. What's next, horses, ATVs, dirt bikes, trolleys, jitneys, paving and grading the more challenging trails for wheelchair access (or course, in conformity with ADA)? The camel's nose is in the tent, and hikers, intentional or not, will be relegated, in some areas, to steering clear. That's sort of like saying that now that we have civil rights, Lincoln should receive no credit and his place in the grand scheme should somehow be less than the Emancipation Proclamation rightly deserves.

For me, at my age, much of this is little more than an academic exercise. I've hiked the trails in Jersey, I'm growing old and the body doesn't always cooperate the way it used to. Also, I can always head for greener pastures in the Adirondacks or the White Mountains. Who I fear for is the inexperienced young family out for a day on the trail. They may not even know that mountain bikes are permitted. But, sooner or later, somebody on a mountain bike, out for the "rush" (the opposite reason that the young family is on the trail) will crash into some three-year-old and the fertilizer will be in the fan. Perhaps the child will even be killed. Who, then, will be willing to stand up and say, "I let the mountain bikes on the trails?" The buck-passing and legal wranglings will be little short of hilarious.

The toothpaste will be out of the tube and the legal fallout will leave all with a share of blame. Many will be named in the resulting suits, from the manufacturer of the bike right on up to the "managing" agency, as well as individuals. Disclaimers will have no meaning in the rumblings



## E-MAIL COMMENTS

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that will be sure to follow.

I urge you to moderate your position on mountain bikes utilizing hiking trails(why are they called "hiking" trails, anyway?)and de-emphasize the concept of "multi-use" trails. This kind of reminds me the guy who converted his rec room into a basement - his intentions were good, but the results, for whatever reasons, stunk. Further, no matter what the intentions or reasons, the results were identical. It doesn't matter whether someone slips off a cliff or is pushed - he is equally dead - the results are identical for the deceased, regardless of the intentions or reasons.

George Nimmo

"We have met the enemy, and he is us."(POGO, Walt Kelly)

Subject:

Author: Nixon; Janice

Date: 8/20/99 2:58 PM

I would like to take a minute to let you know that, as a horse owner and trail rider, I appreciate the trails in N. J. to ride. I enjoy being out on the wooded trails, and I am really afraid that this enjoyable hobby will slowly disappear, as the trails may someday disappear as well. If we don't take the time now to make sure they are protected, there may not be anything left in years to come. I realize it takes time and money to maintain these trails and facilities. There are plenty of large equine corporations that could be solicited for funding. Horseowners wouldn't mind if they are charged a couple of dollars to ride on the trails for the day, knowing that they are saving the trails, for the future. Thank you.  
Janice Nixon

Subject: Draft Trails Plan for Delaware Water Gap

I would like to introduce myself as the chair for the JORBA (Jersey Off Road Bicycling Association) chapter in Sussex County, New Jersey and I would like to express my desire for Draft Trails Plan Alternative B. As a biker this is my obvious choice because it increases the mileage incredibly! Also, as someone who likes to keep peace between all people, Alternative B offers more to all user groups of the trail system at the Delaware Water Gap.

If Alternative B is implemented, JORBA is committed to helping the National Park System at the Delaware Water Gap with trail days, etc. I invite you and others at the National Park System to contact me directly when you need assistance, and I will gather the volunteers needed.

I hope that Alternative B is the choice of most people who are commenting and I look forward to finding out the final decision.

Thank you for taking the time to find out the interest of the people.  
Jennifer Olmstead

Subject: Delaware Water Gap Draft Trails Plan

Hello Mr. Laitner-

I'd like to cast my vote for Alternative B in the Draft Trails Plan currently being considered for the Delaware Water Gap National Recreation Area. In addition, I believe the most satisfactory use of these trails can be achieved by "positive posting" informing trail users as to which mode of travel is permitted, i.e., foot travel only, bicycle travel only, etc. Please take this into consideration as you finalize your plans.

Glenn Oster

## E-MAIL COMMENTS

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Subject: trail plan comments

I am pleased to have this opportunity to comment on the proposed "TrailsPlan" options to amend the DEWA GMP. It is my opinion that while the three plans proposed have merit at different levels the Public might best be served by an amalgam of option B, and option C.

Plan B may be the best overall plan offered for the future use of the park trails, plan C may provide the best path with which to achieve that.

Using historic perspective as a guide as well as my own hiking experiences there are two general types of hiking. Hiking to a destination, or hiking for the trail experience. In this comment i am including hiking to mean all non motorized trail use.

I am not acquainted with any studies which might offer percentages of use by these categorizations. Clearly though, in the case of some of the trails which have waterfalls or offer views of other striking natural features, destination would be the prime motivator for trail use. In the connective linkage concept of trails, you would be creating a network where destination could be the primary goal with a variety of trail options to that destination satisfying the desire for a good user experience.

I think more to the point is the need for an action plan of how to prioritize and achieve this network. I don't think that the current GMP is appropriate.

I Think that there are attractive reasons to implement plan C first.

Plan C would create focal trail areas within the park. While I understand that plan C does not include the concept of linkage, where there are adjacent trails hikers who wish to go from one to another will do so. This of course will "link" the trails. Developing the individual trails prior to linking will offer several benefits. It will allow for informal crowd control in that as users fill popular areas the overflow if asking "where can we go ..." can be directed to less used trails which offer a similar experience to those which are crowded. As the individual trails are refined, it will permit real data to be collated regarding use of trail types and locations. As the linkages are made, emphasis could be given to those linkages which would connect well used areas with less used areas and expand the user experience. Developing the individual trails first will provide loops of various length so that a hiker can do more than hike in and out on the same trail.

Which would serve the needs of the park and the public better? Developing the trails along the "spines" or developing the trails separately first. Having hiked the AT at various locations I would argue that not all or even most hikers would prefer "skyline" hiking. There is a degree of difficulty involved in holding to a ridge line. This focus seems to be driven also by where the anticipated funding is to come from. I would suggest that this being a General Management Plan, stressing "general" should give latitude for establishing and including alteration criteria.

If plan C were amended to essentially be phase one of plan B, that would satisfy the desire to establish the system concept of trails. I am not acquainted with the concept of system fitting a disjointed noncontiguous jumble of components which the trails are or would seem to remain under plan C. If the action plan were drafted to include provision that elements of phase two could be effected before all of phase one were completed it would provide for optimum flexibility within your planning structure.

The latitude to abandon some portion of the plan if either financial, environmental, or other profound impediment is identified after the adoption of the plan is crucial. I understand that law requires NPS to follow the GMP. It seems logical therefore to incorporate into the GMP the necessary language to establish a mechanism which would require reexamination of the propriety, location, and scope of a trail if certain criteria were met. ex. If any endangered flora or fauna is identified as potentially threatened by the trail and use. If there is a potential for significant degradation, and there are insufficient funds for maintenance etc..... It seems to me that most of these such criteria will be looked at minutely prior to trail construction. To be trapped into a situation where the GMP doesn't allow for modification if there are overbalancing negative criteria discovered after the plan is effected is shortsighted and could conceivably result in a high profile black eye.

Should there be independent trails C or a linked network of trails B. If for no other reason than emergency personnel access throughout the park, any trail scenario should consider improving response capabilities for all types of emergency situations. This would argue in the long run that plan B would provide the most collateral benefit in this light. I have seen evidence of current visitor use in, and to do so myself have frequented, remote areas of the park. A simple fall for a solo hiker could prove fatal if response time after discovery is over long. The trails system could be crucial in wild fire suppression etc. comments specific to Montague and the Country Road Trail:

Near the intersection of the Old Mine Road and Rt 206 there are several old road beds. They lie south of Rt 206. The maps included have left an area of park land, bounded on the north by Phillip's Lane and on the south by the Sandyston TWP boarder identified as private land. Phillip's lane went from Rt 206 to the Black Farm. The area from 206 to the proposed Country Road trail has been abandoned and is privately used by an adjacent private owner. The balance of the lane is entirely available and is often used by hikers/hunters. This could be improved and connected to the CRT as it would fall roughly midway between the trailhead at Old Mine Road and where it intersects with Jager Rd. The network of old roadbeds on either side of the Old Mine Road in this vicinity would offer a variety of short loops. Some of these beds are well suited to cross-country skiing, mountain biking, and horseback riding in addition to hiking. They would need mowing to make them accessible. There is also abundant parking space which would be attractive to equestrians.

There might be interest in developing a trail which would be suitable for horse and carriage. To my knowledge there are almost no real road rigs can exercise.

Hope that you find some of this helpful. I will have more comments later.  
Len Pollara

## E-MAIL COMMENTS

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Subject: No More trails for the Delaware Water Gap

I understand that there is a proposal to create more trails within the Delaware Water Gap's 70,000 acres. I am concerned with this disturbing action to the wildlife. It is my opinion that the more trails, the fewer wildlife/birds can live within an area. I oppose this proposal completely. I believe the "no action" option where the status quo would be maintained should be considered.

Rose Rosenbaum

Subject: I am writing about your plan to destroy Delaware Water Gap

Your plan to create more trails will drive more animals and more species into oblivion. You know that. I am in favor of leaving it exactly as it is. Please don't make more trails. I want option one - "no action" where the status quo is maintained.

B. Sachau

Subject: Draft trails plan comments

Hi Park Superintendent Laitner,

Thank you for sending me a copy of your Draft Trails Plan. I think you've done an impressive job putting this together, and I believe that there is a definite need to add additional trails within the NRA. Along those lines I think that Alternative B shows the most opportunity and really links the park together with some long distance trails as well as short linkages in areas of interest.

I am really happy to see the new long distance trail being developed on the PA side.

My overall concerns are:

1. Linkage trails to or very near the AT causing the AT to be used by non-hikers/skiers. As more linkages are tied in, and particularly non-foot use or multi-use as that includes Horse, Mountain Bike and motorized vehicles. If its easy for someone to use the AT, they will and if they are on a horse or mountain bike and are in the process of making a loop, I think that they will not change their route simply because the AT is a foot path.

2. Who will build the trails? Volunteers or seasonal staff crews? How will these people be found and trained and who will oversee them. It isn't stated very clearly exactly where these people are coming from. How will they be built? With minimal impact on the environment. Handicap accessibility or wheelchair accessible multiuse trails. Who will maintain the trails once they are constructed? Volunteers or seasonal staff crews? This should be determined before the trail is constructed. What plans are responsibility? If a group changes and can not keep up a trail will it be closed or will the park hire seasonal staff crews to do the work?

3. I'd like to see a few options for overnight tent camping along the longest trails, and also places for year round fresh water as well as toilet facilities.

Sincerely,

Dan Schwartz

Subject: Draft trails plan for Delaware Water Gap Recreation Area

Hi,

I strongly urge you to adopt Alternative B, which allow mountain bikes to use up to 98 miles of trails in this area.

Ronald S. Soussa, SIOR

Subject: delaware water gap

Author: Dave Whomsley

Date: 10/04/1999 8:23 PM

I'm writing to express my opinion regarding the plans for the delaware water gap recreational area. I often visit the gap and as an avid mountain biker would like to see more planning involving mountain bike trails. Being close to Philadelphia, I also visit the Wissahickon Valley trails and enjoy participating in their biking community. One of the reasons for such commoratorie is the fact that different trails are available for different riders - Forbidden Drive for a long, leasurly ride and many single-track trails for the more youthful riders. I support the adoption of your plan to create a series of connecting trails with some multiple-use trails with an emphasis on mountain bike trails so that the area will attract more youthful riders, providing with them with a healthy alternative to "life on the streets".

Thank you for your attention.

Sincerely,

Dave Whomsley

## COMMENTS FROM PUBLIC WORKSHOPS HELD ON AUGUST 10-12 AND SEPTEMBER 22, 1999

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### ALTERNATIVE A

- \* No mention of opportunities to develop off road motorcycle use in selected areas.
- \* Limited mountain bike trails – not enough
- \* More & longer horse trails with trailer access – will share with bikes
- \* Definite need for more trails and long distance hiking/backpacking opportunities with facilities such as AT shelters
- \* Current trails are mostly single use hiking trails which only provide opportunities for day hiking.
- \* Please designate Blue Mountain Trail as horse trail as well as bike trail.
- \* Plan A does not anticipate or address the following: how to reduce impact on high use trails
- \* Mt. Biking is too limited and needs to be greatly expanded to reduce future increased usage.
- \* Note the AT which is used only by hikers is having its own impact problems. The notion that mountain biking is the problem is short sighted.
- \* Plan A is not a viable option. This doesn't help use the park's unused trails & sites to benefit all users
- \* The lack of trail combinations is going to increase the impact.
- \* Bad idea! Would like to see the planned development of a comprehensive trail system.
- \* Preserve backcountry hiking experience - development may interfere with this
- \* Concern with impact of horses on trails/resources
- \* Equestrians on existing horse trail have seen little other use
- \* No action offers little potential for connections to outside communities, etc.
- \* No action has happened so far in spite of all the meetings held already – nothing will happen after this meeting
- \* In favor of no action – less environmental impact and less cost
- \* Not in favor of no action – too willy-nilly
- \* Usage is increasing – no action will be detrimental under higher use
- \* Concern for erosion on hiking trails
- \* No action alternative encourages volunteer participation
- \* In favor of no action- utilize what you have, send people to different places, not just the same old trails – NPS has created the overuse
- \* Keep no action for trail development but provide comfort stations
- \* Hiking clubs do the same hikes over and over – they should go to different places
- \* Maintenance of trails now is not great – opening more trails will only lead to more trash and poorly maintained trails
- \* Plan A is excellent because it keeps the area natural with low impact on trails in most areas. Dollars available can be used for education, bear-proof garbage cans, better signage, and toilet facilities. Less money for new trails hopefully leaves more for these other basic needs.
- \* Mix bikes & horses as multi-use
- \* Hikers outnumber horses/bikers but cost of alternative result of developing trails for these uses.
- \* No designated trails for bikes – need more
- \* None of the plans improve the trails in water gap which are most overused – developing new trails will not take pressure off water gap trails
- \* Why develop trails at all – too much money
- \* Alternative A has less impact on environment with regard to construction – less fragmentation of habitat – less loss of resources
- \* Alt A preserves wilderness experience better
- \* Money should go to signs
- \* Alt A should protect resources just fine
- \* Alt A should include expansion for cycling
- \* Should be designated bike trails – old roads could be designated and no more work needs to be done.
- \* I prefer A if the draft trails plan is followed. I would go for the networking of B but I will not endorse 8-foot gravel paths with 2-foot shoulders.

### ALTERNATIVE B

- \* Bike routes are too flat (Country Road)
- \* Linked is harder to enforce
- \* Encourage more horse trails & loops in NJ
- \* Horse trails need road access for trailers
- \* Longer horse trails
- \* More user conflicts in linked network
- \* Identify specific groups to maintain trails sections prior to establishment
- \* Combine hiking/biking with horse (if a bike could go so could a horse in most cases)
- \* Keep AT separate from multi-use trails
- \* Allow use of motorcycles on snowmobile trails.
- \* Increase mileage for snowmobile/motorcycle use.
- \* Maintain current width of existing roads/trails. Use natural surface whenever appropriate
- \* Yes! Get crackin!
- \* Explore linkages with PA Bureau of Forestry/PA Game Commission in Pike County/Monroe County
- \* Provide additional horse trails in NJ and PA
- \* Do not link multi-use trails to AT
- \* Not in favor of expanding or relocating snowmobile trail to Eshback area – impacts to archeology
- \* Snowmobiles not compatible with preserving wildlife/environment

- \* Safety – how will park staff handle increased visitation/usage of expanded trails – this could impact volunteer services (fire/police) in surrounding communities
- \* Park will have plan – very exciting
- \* Concern that Zimmerman Road is relocated correctly
- \* Would like trailhead adjoining Milford Borough at Metz Ice House
- \* Love the Country Road Trail and Plan B
- \* Old road beds could be developed for hiking, biking skiing in NJ off Old Mine Road 200 ft south of Route 206.
- \* Go from popular area to popular area and give folks new experience along new way
- \* Consider changing trail names that reference “link or connector” – name doesn’t sound very exciting and people may not use
- \* On Mountain Road & Upper Ridge Road horse trails, concerns for safety because taking horses back on same path – begin galloping
- \* Longer horse trails would keep equestrians in the park longer
- \* Horse trails should be at least 16 miles or 2 hours- investment of time and energy to hook up horse and trailer
- \* Bikers need either alternative B or C to add more mileage
- \* Bikers and horses could share trails- but need folks to act responsibly.
- \* Along Old Mine Road, former home sites have many opportunities for long, turn around parking for horse trailers
- \* Is helpful by reducing impact on the existing trail plan
- \* The expanded mountain bike trails are the most fair and reasonable plan. This allows the common user experience the vast treasures of the entire park.
- \* The impact of mountain biking on the proposed trails here is not a factor. The type of roads are relatively gradual slopes.
- \* One or two areas maybe appropriate to more technical mountain biking. These would best be developed without easily accessible links to hiking trails. And only accessible to road way or logging type trails.
- \* Under Alternative B, you have, on the map, but not in the description, an Indian Ladders link to PEEC from Hornbeck Creek Trail. Have any of you seen this trail? This is not an easy trail at all. In inclement weather it can be downright dangerous even to the experienced hiker. It is certainly not to be recommended to the usual hiker with sneakers and shorts. Should you try to “improve” this trail you will only destroy any thing that makes it worthwhile for the adept hiker to hike this stretch. Do not establish this link.
- \* Too many close bike connections to the AT – AT should be buffered from multi-use – fear of increased use by bikes/horses
- \* Keep no ORV use
- \* Woods Road is too close to Buttermilk & Silver Spray Falls – sensitive areas, too steep for bikes (impact)
- \* Alt B has too much environmental impact
- \* No motorcycles – snowmobiles are tolerable but motorcycles are not
- \* Concerns about implementation/funding issues – identifying procedures for links to Monroe County
- \* Reinstate cross-country ski trail in the youth Hostel area
- \* I would like to see the cross-country ski trail at the Old Mine area be included in Alternative B. I used to ski there until it became impossible to find your way
- \* Alternative B could connect with outside trail network especially in the Sawkill Creek watershed & Milford area
- \* Re partnerships: construction of bike trails as proposed isn’t likely to appeal/ elicit the assistance of the bikers who are most likely to volunteer to do maintenance, etc.
- \* I can’t say at this point which plan I favor. However, I am very concerned about Plan B, as it would require heavy patrols & enforcement (not just volunteers making reports) to have any hope of working without serious user conflict.

#### ALTERNATIVE C

- \* Increase mileage for motorized use. This plan gives motorized use the least trail mileage.
- \* Need to work with partners building trails outside boundaries esp Pike County Bureau Forestry, Game Lands, Monroe County
- \* Concerns about bike/horse impacts, both safety/environmental, keeping back-country experience
- \* Concerns about developing new trails and destroying back-country pristine corridor
- \* Favor C – new trails developed, but provide buffers between multi-use, esp AT
- \* Concerned about bike use on Route 209- safety hazard
- \* Need more horse trails for longer distances – may reduce impacts to current equestrian trails
- \* Reinstate x-country ski trails at youth hostel in NJ
- \* Need hikers shuttle from Kittatinny point Visitor Center to Millbrook.
- \* Property boundary wrong above Jager Road
- \* Potential for another network of trails south of 206/Old Mine Road
- \* Independent networks provide more control over visitor activity in these areas
- \* Start with Alternative C (not linked) - in future when GMP redone, park will have benefit of knowledge gained from development of smaller networks to decide if they need to be or it is practical to develop the linkages
- \* Visitors tend to focus on one resource at a time anyway - focused on and satisfies the day hiker
- \* For bikers, not enough loops- too much out and back
- \* There should be more loops for bikers.
- \* Two items from B added to C – Country Road Bike Trail – Van Campens to Rattlesnake hiking connector.
- \* For Alt C, the draft plan does not supply adequate information on the potential impacts of new trails on soils, water resources, fish & wildlife, vegetation, and threatened or endangered species.

- \* Develop C-type networks first to moderate & control visitor numbers
- \* Alternative C with additional mileage for motorized use and motorcycle use.
- \* Plan C modified to some specific user groups areas would make the most sense. Attempting to modify trails systems in-mass to accommodate occasional intense users while excluding ORV's or equine uses is unacceptable. By measure of the US Government there are 60,000 ORV's in NJ

#### EQUESTRIAN USE

- \* Designate a manure disposal area at trailheads
- \* Reduce environmental impact by creating additional trailheads for horses. Disperse traffic on trail.
- \* Allow use of secondary roads within the area by horses historically used by horses.
- \* Not all owners have trailers. Those living nearby could access trails by riding.
- \* Award "Ghost Riders" recognition to those who ride without leaving any trace.
- \* Provide handicapped mounting platforms at trailheads
- \* More horse trails – more miles of trails – specifically from existing trail (Zimmermann area) to Sproul Road connecting to Connashaugh. Fix/repair bridge to Bride and Groom to Rocco's.
- \* Include Toms Creek network into horse trails/multi-use hiking
- \* Connect Upper Ridge Road Trail to Mountain Road Trail via Country Road Trail
- \* Include former/present snowmobile trail at Turn Farm or all snowmobile trail into equestrian use
- \* Update webpage as to horse trail information
- \* Equestrian concerns are not being addressed in the plan. Horse trails only show 6 miles.
- \* I would like to see horses be able to use minor dirt & gravel roads as well as other trails. 7 miles only takes 1 hour on a horse.
- \* What to do w/horse manure when done – no receptacles
- \* Disperse horse trails & trailheads
- \* Put a trailhead for horses near 209 just above Zimmermann Rd near Conashaugh Creek
- \* Upper Ridge Trail is too short for horses-no point to bring horses there
- \* Mountain Road Trail is not a complete loop, you can not go back the same way because straight line horse trail will cause a horse to get out of control when it senses that its close to ending - a loop keeps horse from knowing the ride is ending

#### MAPS

- \* Check small AT loop in PA
- \* Peters Valley- why do lines go outside boundaries
- \* Philip Lane to Sandyston Twp. Border along 206 should be NPS property
- \* The maps are difficult to read, the trails are hard to see, so it is not easy to make comparisons between the alternatives.

#### MAINTENANCE AND MANAGEMENT

- \* I believe multi-use trails need a strong management plan to resolve disputes.
- \* Trail maintenance should be defined and standards agreed upon.
- \* Groups need to be found to support a trail before any construction should occur.
- \* Jacobsburg State Park has excellent multi-use trail that could be example
- \* Pacific Crest Trail (CA or WA) is designed for pack horses/hiking and is not 8 feet wide – can we use this as model?
- \* Get rangers out on the trails again to lead hikes and interact with the public
- \* Further refinement of trail construction standards
- \* Identify appropriate trails for ORV/Trail motorcycle use via a pilot program
- \* Signs on trails to show right of way
- \* Are all multi-use trails to be 6-8 ft wide gravel surface?
- \* Design width/surface to accommodate anticipated use
- \* May want to check route of East Coast Trail along Old Mine Road
- \* Stroudsburg to E. Stroudsburg are boroughs, not cities – also check Matamoras
- \* Trail system should not degrade canoe experience from river
- \* Utilize Delaware & Hudson rail corridor for Gap View network
- \* Final plan should address connections to projects outside boundaries
- \* Final plan should address how future funding would be obtained

#### GENERAL COMMENTS

- \* The public comments were thoughtful and interesting
- \* ADA mobility & visually impaired people's needs should be considered
- \* Reach out to all user groups including ORV/trail motorcycles
- \* Please break down the costs of the project so we may know where expenditures are going: generalized costs, paving, earthmoving, parking areas, rest rooms, signage, environmental studies
- \* I would like to see the impact at Marie Zimmermann property kept to a minimum because of my enjoyment for enjoying birds and other wildlife.
- \* There should be uniform signage

#### DELAWARE WATER GAP

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- \* Do you know that you will have the resources to do this? Now? 20 years from now? \*What about trail maintenance on multi-use trails?
  - \* ORV users also need consideration on these issues.
  - \* Need motorcycle trails. Perhaps use same trails as used for snowmobiles, plus dirt roads motorcycleists are a responsible user group, and want a fair share too!
  - \* Allow use of snowmobile by motorcycles during non-snow seasons.
  - \* Note that motorcycle clubs have a positive impact as far as trail maintenance and trail construction. Motorcycle clubs are organized for trail management.
  - \* Need to have trails available for motorcycles and ATVs. Organized volunteers would be available if needed.
  - \* The plan is trying to be too many things to too many user groups (though not all) in too many areas simultaneously.
  - \* I hope that you will continue to exclude all motorized trail use. These can be heard for miles, and have enormous impact on any non-hardened surface. They degrade the experience of all other users, for the pleasure & benefit of the few. Please keep them out.
  - \* Networks on the maps are not easily distinguished. Color-code or highlight the networks so they are easy to see.
  - \* Links to heritage corridors outside of park- example Upper Mt. Bethel, Slateford Farm, Columbia foot bridge
  - \* Concerned about funding; however, I truly believe you can get volunteers( for the bike trails anyway I'm sure other trail user groups) and the costs will go down. You also may get volunteers of groups (for instance a bike group or hike group) that will sponsor a trail head. Again this will cut costs.
  - \* I would like to see trails that aren't too developed so I can experience birdwatching.
  - \* Provisions should be made for a few backcountry campsites
  - \* Leave old roads current width and not widen especially woods roads
  - \* Grade system of trails so they provide a variety of experience

**LEGEND**

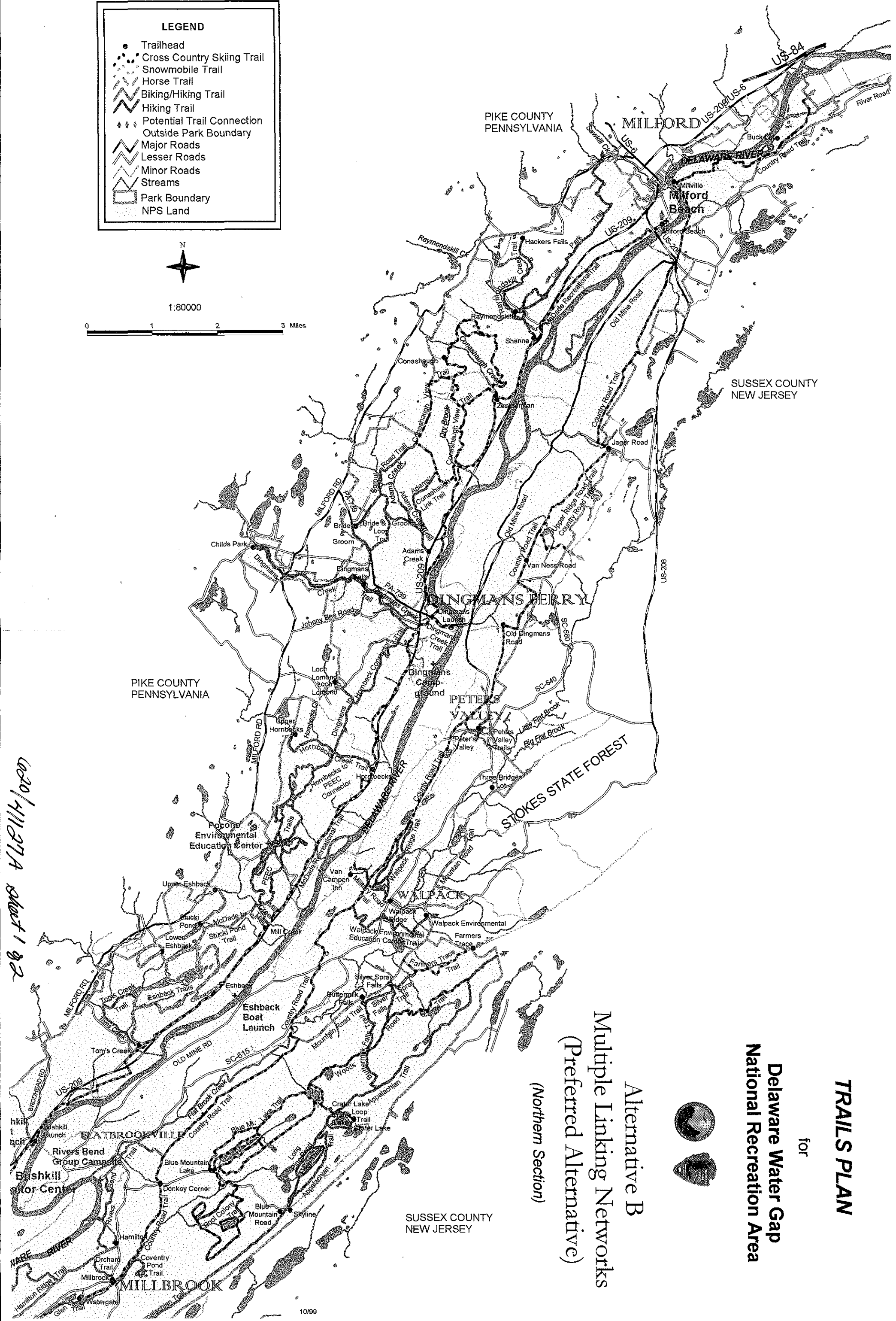
- Trailhead
- Cross Country Skiing Trail
- Snowmobile Trail
- Horse Trail
- Biking/Hiking Trail
- Hiking Trail
- Potential Trail Connection
- Outside Park Boundary
- Major Roads
- Lesser Roads
- Minor Roads
- Streams
- Park Boundary
- NPS Land



1:80000



1000/4/11/27A sheet 1 of 2



# TRAILS PLAN

for

Delaware Water Gap  
National Recreation Area

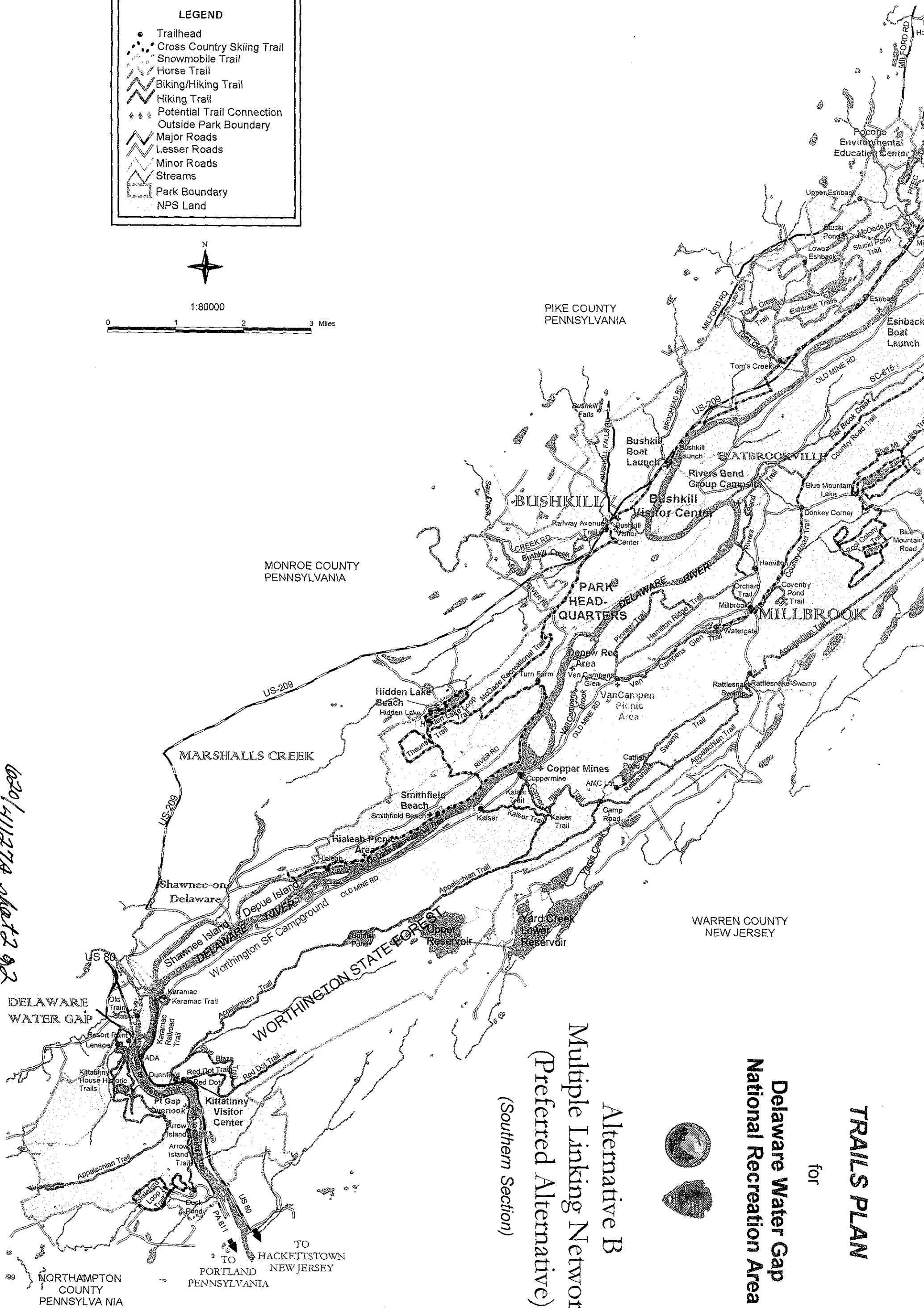
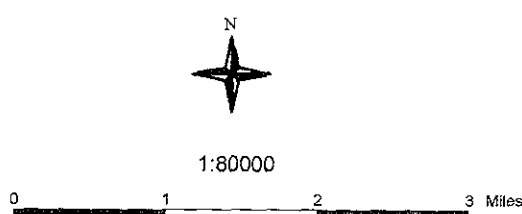


Alternative B  
Multiple Linking Networks  
(Preferred Alternative)  
(Northern Section)



**LEGEND**

- Trailhead
- Cross Country Skiing Trail
- Snowmobile Trail
- Horse Trail
- Biking/Hiking Trail
- Hiking Trail
- Potential Trail Connection
- Outside Park Boundary
- Major Roads
- Lesser Roads
- Minor Roads
- Streams
- Park Boundary
- NPS Land



6820/411277A sheet 2 of 2

**TRAILS PLAN**

for

**Delaware Water Gap  
National Recreation Area**

**Alternative B**

**Multiple Linking Networks**

**(Preferred Alternative)**

**(Southern Section)**



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