

Delaware Water Gap National Recreation Area
New Jersey • Pennsylvania

National Park Service
US Department of the Interior



Visitor Use Management Plan

Comment Analysis Report

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INTRODUCTION

The purpose of the Visitor Use Management Plan (VUM plan) for Delaware Water Gap National Recreation Area (the park) and Middle Delaware National Scenic and Recreational River is to maximize the ability of the National Park Service (NPS) to encourage access and improve visitor experiences while protecting the natural and cultural resources of the park. This planning process examines current and potential visitor opportunities and develops long-term strategies to provide access, connect visitors to important experiences, and manage visitor use. To meet the purpose, the VUM plan identifies the highest-value resources, defines locations throughout the park to enhance visitor experiences, and sets priorities for resource protection where visitor use occurs.

The park's general management plan is over 30 years old and does not reflect current visitor use patterns and needs. The VUM plan provides updated guidance to address current and future visitor use opportunities, management strategies, and resource protection concerns. The VUM plan uses the visitor use management framework developed by the Interagency Visitor Use Management Council to develop a long-term strategy for managing visitor use within the park. (For more information, please visit <https://visitorusemanagement.nps.gov>.) Proactively planning and managing visitor use supports responsive management and is at the heart of the NPS mission.

The goals and objectives of the VUM plan are as follows:

- Minimize impacts to resources and visitor experiences caused by visitor use.
- Enhance opportunities for the park's key visitor experiences.
- Assess the appropriateness of current and new/evolving visitor opportunities while considering visitor safety and resource protection.
- Align public expectations for use with availability of resources or infrastructure.
- Increase understanding of existing and emerging visitor interests, use characteristics, patterns, and trends.
- Manage visitor demand and expectations at popular destinations.
- Identify and evaluate various visitor use management strategies.

DEFINITION OF TERMS

Primary terms used in this document are defined below.

Correspondence: A correspondence is the entire document received from a commenter. It can be in the form of a letter, email, comment form, note card, open-house transcript, or petition. Each piece of correspondence is assigned a unique identification number in the NPS Planning, Environment, and Public Comment (PEPC) system.

Comment: A comment is a portion of the text in a correspondence that addresses a single subject. It should include information such as an expression of support or opposition to the use

of a potential management tool, additional data regarding an existing condition, or an opinion debating the adequacy of the analysis.

Substantive Comment: A substantive comment is defined as a comment that does one or more of the following: question, with reasonable basis, the accuracy of information in the document; question, with reasonable basis, the adequacy of the environmental analysis; present reasonable alternatives other than those presented in the document; or cause changes or revisions in the proposal. Substantive comments raise, debate, or question a point of fact or analysis.

Non-substantive Comment: Comments in favor of or against the proposed action or alternatives, or comments that only agree or disagree with NPS policy, are not considered substantive. NPS staff read and considered all substantive and non-substantive comments; however, non-substantive comments do not require a response.

Concern Statement: A concern statement is a written summary that captures the concern or topic of a group of similar comments. Some groups of comments may be further separated into several concern statements to provide a better focus on the content of the comments.

Response: A response is a prepared reply for each unique, substantive idea or issue raised in the comments. Some responses may be reflected as edits to the text of the final VUM plan to clarify existing information or add new information.

SUMMARY OF PREVIOUS PUBLIC INVOLVEMENT

In August 2014, the park began planning for the VUM plan by holding an internal scoping meeting attended by an interdisciplinary team of NPS managers, specialists, and researchers. The purpose of this meeting was to understand the objectives, desired outcomes, and need for a VUM plan at the park. To get initial input from the public and stakeholders, the park conducted public outreach by holding two listening sessions open to the public and two focus group meetings for stakeholders and land managers.

Following the civic engagement efforts, the park's planning team held a workshop to work through process steps to inform the plan, establish the goals and desired conditions, and develop management strategies. The public was able to review these possible management strategies through the public scoping newsletter, at the three public meetings, through a webinar, and on the PEPC website.

During the scoping period, three public meetings were held in Pennsylvania and New Jersey from September 10 through September 12, 2015. Meetings were held in Sparta, New Jersey, on September 10; Matamoras, Pennsylvania, on September 11; and Bushkill, Pennsylvania, on September 12. A total of 148 individuals attended the public scoping meetings. Additionally, the park hosted a webinar for individuals who could not attend those meetings. The webinar took place on September 16, 2015. A webinar consisted of a presentation followed by a question-and-answer session. The webinar was attended by 22 people. Following these meetings, the posters and recorded webinar were placed on the PEPC website for public review.

The public scoping comment period was open from September 8 through October 9, 2015. Members of the public were able to submit their comments on the project electronically through the PEPC website and by mailing comments to the park. During the public comment period, 114 individual correspondences were received; most of these (84 correspondences) were submitted directly through the PEPC system. The majority of the correspondences came from New Jersey and Pennsylvania. The topics that received the most comments included opinions on appropriate recreation activities and management of the park.

The public scoping comments were analyzed and included comments on the following categories:

- Camping and overnight opportunities
- Day-use picnic and recreation sites
- Expanded and changed recreational opportunities
- Interpretation and education
- Operational strategies
- River access
- River camping
- Trails and trail use
- Miscellaneous comments that may be of interest to the park in future planning efforts
- Hunting in the park

DRAFT VISITOR USE MANAGEMENT PLAN COMMENTS

Following preliminary public engagement during the scoping phase, public input was once again solicited during the formal planning process. The public comment period for the draft VUM plan was open from October 7 through December 6, 2019. The National Park Service held two public meetings during the comment period. These meetings were held in Bushkill, Pennsylvania, on October 24, 2019, and in Sparta, New Jersey, on October 26, 2019. The National Park Service announced the release of the draft VUM plan and the public meetings on the park's website; via press release; on social media; in letters to local, federal, and state elected officials; during pop-up information tables in the park and surrounding communities; and in local newspapers. The National Park Service also distributed newsletters to inform the public of the planning process, provide a summary of the key topics in the draft VUM plan, provide information on the public meetings, and invite the public to provide comments.

The public could make comments on the project electronically through the PEPC website, by mailing comments to the park, and by submitting comments at the public meetings. All comments received via mail were transcribed into the PEPC system. The National Park Service welcomed comments from the public; federal, state, and local agencies; non-governmental entities; and other interested and affected parties.

The public meetings were presented in an open house and public hearing format allowing the participants to speak with NPS staff, ask questions, and share ideas. Following the open house, participants were invited to provide oral comments that were recorded by a court reporter. After all participants were given an opportunity to comment, the open house resumed for the remainder of the meeting. The meeting in Bushkill had 124 participants and 30 people gave oral comments. In Sparta, 30 people attended the meeting and 17 provided oral comments.

During the public comment period, 830 unique correspondences were entered into the PEPC system. Most of these (752 correspondences) were submitted directly through the PEPC system by individual commenters. The remaining correspondences consisted of written comments that were entered into the system to be coded and analyzed comprehensively. Nearly 850 pieces of correspondence from 19 states were received during the public comment period. Only 23 of the submitted correspondences were form letters. All form letters were read to determine if they contained any additional substantive material. Correspondences that did not contain any material that differed from the form letter were included as a signature to the form letter. Correspondences with additional text were considered individual correspondences. All oral comments were entered into the PEPC system and were analyzed as unique pieces of correspondence. In addition to the general public, members of the following agencies and organizations submitted comments on the draft VUM plan:

- American Whitewater
- Appalachian Mountain Club
- Appalachian Trail Conservancy
- Chamberlain Canoes
- Delaware Township
- Delaware Valley Orienteering Association
- Dingman Township
- Double V Rod and Gun Club, Inc.
- Edge of the Woods Outfitters
- Friends of Old Mine Road
- Blairstown Historical
- Girl Scouts
- Jersey Off Road Bicycle Association
- Kittatinny Canoes
- Kittatinny Lake Community Association
- Last Frontier Angler LLC
- Lehman Township Board of Supervisors
- Montague Association for the Restoration of Community History (M.A.R.C.H.)
- Matamoras Rod and Gun Club
- Milford Garden Club
- Millbrook Village Society
- Monroe County Planning Commission
- Montague Township Commission
- MTBNJ.com
- New Jersey Fish and Wildlife Council
- National Parks Conservation Association
- National Rifle Association
- National Wild Turkey Federation
- New Jersey Herald History Columnist
- New Jersey Highlands Coalition
- New Jersey Historic Preservation Office
- New Jersey Outdoor Alliance
- New Jersey State Federation of Sportsmen's Clubs
- New Jersey State Parks
- New York-New Jersey Trail Conference
- Pennsylvania Fish and Boat Commission
- Pennsylvania State Legislature
- Peters Valley School of Craft
- Pike County Commissioners
- Pike County Government
- Pike County Office of Community Planning
- Pocono Bike Club
- Pocono Environmental Education Center

- September 11th National Memorial Trail Alliance
- Sierra Club Atlantic Chapter
- Sierra Club Pennsylvania
- Silver Birch Archery
- Sussex County Chamber of Commerce
- The Borough of Milford
- The Walpack Inn
- Three Rivers Environmental Consulting Inc.
- United Bow Hunters of New Jersey

PUBLIC COMMENT ANALYSIS

Comment analysis is a process used to compile and combine similar public comments into a format that can be used by decision-makers and the project team responsible for revising the VUM plan. An analysis structure was developed before coding was initiated to capture the content of all comments received and to help sort comments into logical groups by topic and issue. Comment coding was updated and revised throughout the analysis as needed to more accurately group the comments. The coding structure was derived from an analysis of the range of topics covered in the draft VUM plan. Ultimately, comments were coded into the following categories:

- Fees
- Recreation expansion
- Day-use and recreation sites
- Land-based camping
- River camping
- River access
- Trail use
- Mountain biking and equestrian use
- Hunting and fishing
- Closure of sensitive areas
- Interpretation and education
- NPS staffing and law enforcement
- Concessions
- Accessibility
- Management strategies
- NEPA/plan process
- Visitor use data
- VUM plan revisions

All comments, regardless of the topic, were carefully read and analyzed and are presented in this report. All comments will be considered when revising the draft VUM plan. The park will send out press releases for announcements on new documents related to this project. Information can be viewed on the NPS PEPC website www.parkplanning.nps.gov/dewa.

Although the analysis process attempts to capture the full range of public concerns, this content analysis report should be used with caution. Comments from individuals who chose to respond do not necessarily represent the sentiments of the entire public, and may not accurately reflect existing conditions, directions, or situations. Furthermore, this was not a vote-counting process, and the emphasis was on content of the comment rather than the number of times a comment was received. This report is intended to be a summary of the comments received, rather than a statistical analysis.

PUBLIC COMMENTS AND NATIONAL PARK SERVICE RESPONSES

This section summarizes the comments received during the public input process into concern statements and provides NPS responses.

Fees

Due to the similarities across concern statements, this section includes the concern statements and a single response to all fee-related comments that describe the agency's law and policy guidance regarding fee collection, the current fee structure, and the potential for future considerations.

Concern Statement 1. Commenters suggested a wide range of potential fee exemptions (e.g., specific user groups, demographics) that should be considered in the plan.

Concern Statement 2. Local residents should be able to show their driver's license or obtain a free travel sticker from a park office, instead of paying the park's entrance fees.

Concern Statement 3. Commenters suggested that fees or an increase in fees should not be collected because it would negatively impact traffic flow. The plan does not address the traffic impacts that would result from fee stations. This must be considered since many residents, schools, and businesses cannot be efficiently reached without the use of Route 209.

Concern Statement 4. Some user groups, such as senior citizens, should have the option to pay a discounted entrance fee. Other commenters thought organizations and agencies should also have the option to pay a discounted fee.

Concern Statement 5. Commenters stated that, instead of having a parkwide entrance fee, they would like to see fees charged for programs and at high-attraction areas, such as picnic areas, swimming areas, river access areas, boat launches, beaches, camping areas, major waterfalls, the Dingmans Falls area, Childs Park (when it reopens), popular recreation sites (e.g., Watergate), and visitor centers. Some commenters stated that visitors to these areas should be charged, and others stated that only out-of-town visitors should pay. Commenters also suggested that fees would be appropriate for tourists (non-residents) and large vehicles, such as trucks and buses on Route 209.

Concern Statement 6. The VUM plan needs to be clear on how much money the fees would generate and the locations of fee collection. A detailed set of financial projections is needed to highlight the net fees after expenses for fee collection and specific benchmarks on how, when, and how much of the revenue will be used to improve the visitor experience. Collecting fees is appropriate if the money generated is used to restore old or destroyed campsites, create new campsites, increase law enforcement, complete maintenance activities, improve upkeep of existing bathroom facilities, construct new bathroom facilities, enhance roadway maintenance repair (e.g., Old Mine Road, missing bridge at the southwest corner of Blue Mountain Lake), increase the number of lifeguards at swimming sites, provide site monitors, and add sanitation to river campsites. Increased fees should only be collected if the money raised from fees will be

more than what will be needed to spend on law enforcement to collect these fees. All revenue from fees should remain in the park.

Concern Statement 7. Commenters had a wide range of suggestions related to parkwide fees including comments on the fee pricing, strategies for collecting fees, locations where fees should be charged, and timing of fees (e.g., seasonality, time of day). Also, commenters suggested to expand amenity fees, with a specific focus on adding fees to areas that are experiencing inappropriate use, to allow for greater enforcement opportunities and to generate revenue to offset these uses.

Concern Statement 8. Commenters recommended that river launch permits should be required and livery fees raised, instead of having a reservation system and primitive camping fee.

Concern Statement 9. Commenters agreed with the idea of a parkwide entrance fee and stated that the park should collect fees from every visitor who plans to use the park. However, it may not be feasible to collect the fee due to the many roads into and through the park. Commenters suggested that parking passes should be available in area businesses and park offices, and that every parking lot should have self-pay stations.

Concern Statement 10. Some commenters suggested that fees or an increase in fees should not be collected because it would be a financial burden on local businesses, residents, and other user groups.

Concern Statement 11. Charging fees to residents who live and work in the area would affect the relationship of the local residents with the National Park Service.

Concern Statement 12. The park needs solutions other than fees as a management strategy to regulate recreation site selection and visitor dispersion. Commenters suggested additional research/studies be conducted before deciding to administer new fees.

Response. The park considered comments received on the VUM plan and examined the issue of fees further. The plan has been amended and the park will not implement a parkwide entrance fee at this time. Instead, the park will continue management of the expanded amenity fee program and may explore options for the expansion of sites, as described in chapter 4 of the VUM plan. Should the park consider adding any sites to the expanded amenity fee locations or propose a change to parkwide fees, the park will conduct appropriate public engagement at the time.

The Federal Lands Recreation Enhancement Act authorizes five agencies, including the National Park Service, to collect recreational fees on public lands and waters. The act allows the National Park Service to charge entrance fees as well as expanded amenity fees at national park units. Each park unit that collects fees retains at least 80% of the revenue, while the remainder may be distributed to sites within the agency that do not collect entrance or expanded amenity fees. The fees may be used in various ways, but the Federal Lands Recreation Enhancement Act states that the revenue must be used on projects that benefit visitors directly and may be used to pay park staff with positions that directly relate to the visitor experience.

Reference Manual 22A serves as the agency's implementation guidance for the Federal Lands Recreation Enhancement Act. Specifically related to entrance fees, Reference Manual 22A states that the agency should not offer fee exemptions beyond educational groups, first amendment right activities, and official business use. The guidance does not provide for exemptions or variations of entrance fees for different user groups, populations, or demographics. However, the reference manual states that entrance fees will not be charged to those who lawfully enter or use a park for activities unrelated to recreation. Superintendents may establish a pass that authorizes non-recreational users to enter the park under the non-recreational exemption. The park unit is responsible for the design and implementation of this pass and may charge a fee. The rates charged for entrance fees are standard across the National Park Service and are set at the national level based on the park unit designation. Please refer to <https://www.nps.gov/orgs/1207/04-12-2018-entrance-fees.htm> for the listing of nationwide park entrance fees by group.

Future changes in visitation numbers or patterns, degradation of resources, or other factors may lead to the need to change the fee-collection option. At such a time, the park may consider potential fee-collection options again, such as implementing a parkwide entrance fee or parking fees. At this time, neither the number of sites where fees would likely be charged nor the number of sites that would cause the shift from an expanded amenity fee structure to a parkwide entrance fee structure have been defined.

Recreation Expansion

Concern Statement 1. Some commenters expressed that recreation in the park should be expanded and stated that the National Park Service should encourage visitors to use all portions of the park. The National Park Service should manage the park to meet visitor expectations, providing more recreation opportunities instead of closing areas to visitors. Expanded recreation in the park will result in greater economic gains for the National Park Service and surrounding communities. Commenters offered a variety of suggestions for expanding recreation opportunities.

Response. As stated in chapter 1, plan goals include enhancing opportunities for the park's key visitor experiences and assessing the appropriateness of current and new/evolving visitor opportunities. Plan strategies expand recreational opportunities through improving the trail system by linking trail networks, enhancing accessibility, and diversifying trail experiences; providing and improving universal access at key locations; improving and expanding river camping opportunities; and increasing hunting and fishing opportunities.

Concern Statement 2. Some recreational activities (e.g., the use of motorized boats at crowded areas like Smithfield Beach) should be restricted during peak hours. Commenters suggested that visitation in overcrowded areas, such as Caddoo access, should be limited and activities monitored. It was suggested that instead of enhanced parking at Van Campens Glen, the no-swimming policy should be enforced.

Response. The visitor capacity, described in chapter 5, identifies the maximum amounts and types of visitor use that each area can accommodate while achieving and maintaining the desired resource conditions and visitor experiences that are consistent with the purposes for which the area was established. For example, visitor capacity strategies for Smithfield Beach include

separating beach use from boating use to reduce user conflicts. Many additional parkwide plan strategies aim to disperse visitor use to reduce congestion and improve the visitor experience.

Concern Statement 3. Some commenters are opposed to expanded use that will require new development. They are concerned that additional facilities would require maintenance and staffing that the National Park Service cannot provide. Further development may also put stress on current facilities and have an impact on natural and cultural resources. Having places for solitude is more important to some than development of additional facilities.

Response. The plan seeks to provide a diverse range of visitor experiences consistent with the purposes for which the recreation area was established. Chapter 3 describes the desired conditions and zones where development is appropriate and where it is not. Proposed developments focus on areas of heavy use to allow sites like the river beaches to handle larger volumes of visitors so that other sites will not receive as much visitor use pressure.

Concern Statement 4. It was recommended that the National Park Service could acquire an area in Stroud Township for activities such as mountain biking, camping, and trail expansion.

Response. Land acquisition is outside of the scope of the plan.

Day-Use and Recreation Sites

Concern Statement 1. Some commenters favor new day-use activity areas such as additional picnicking areas with bathroom facilities, running water, bear-proof trashcans, picnic tables, and gazebos. Informal or social sites, such as picnic areas and trails, should be formalized.

Response. The National Park Service appreciates this support for new activities. The plan identified approximately 30 unique sites to improve the facilities and visitor experience consistent with overarching plan goals and desired conditions. Several sites, including Namanock, Milford Beach, and Smithfield Beach, have strategies for accommodating larger groups and providing shaded picnic shelters. Sites have been comprehensively evaluated and facility upgrades have been addressed in the plan. Sites such as Milford Beach and Toms Creek could have upgraded or expanded restroom facilities as a part of the plan as funding is available. River camping toilet facilities will also be improved where appropriate. Informal sites/trails, or visitor-created sites/trails, are indicators to be monitored as a part of this plan. Thresholds, which are defined as minimally acceptable conditions for visitor-created sites and trails, have been set either parkwide or by zone. See the full description of the indicators and thresholds in chapter 5.

Concern Statement 2. Camp Hidden Falls is newly acquired by the National Park Service. Commenters suggested maintenance of existing trails and the addition of signage and trail blazes. Additional suggestions included a parking area, bathroom facilities, trail use for cross-country skiing and snowshoeing in the winter, and tent camping. Other commenters suggested the National Park Service should establish a “youth group” campground on the Hidden Falls property. These campgrounds should be geared toward Girl/Boy Scouts and other organized youth groups. The following minimum requirements were suggested: simple bathroom facilities,

safe food storage arrangements, a source of water, and a responsibly prepared campfire circle for cooking.

Response. In response to public comment, the plan has been updated to outline near-, mid-, and long-term actions for Camp Hidden Falls on page 76-77, which includes evaluating opportunities for orienteering, future youth program partnerships, and examining the feasibility of a campground.

Concern Statement 3. Commenters suggested that overcrowding of certain popular areas could be controlled through permit systems and adding more bypass lanes for permit and seasonal pass holders (specifically at Smithfield Beach). Commenters also suggested that variable message boards could be placed on I-80 to warn visitors of areas that have reached capacity. Visitors could then choose to visit other areas of the park or another location outside of the park.

Response. The plan includes the development of permit or reservation systems for some parking areas, trailheads, or destinations to encourage pre-planning within the park as potential future management strategies if changes in use levels warrant the need for permit or reservation systems (see chapter 6). These strategies are also being considered as alternatives to a parkwide entrance fee.

Land-Based Camping

Concern Statement 1. The National Park Service should consider a backcountry permit for backpackers to be allowed to camp anywhere in the park.

Response. Currently, backcountry camping is permitted only along the Appalachian National Scenic Trail and only for hikers on extended trips. In chapter 4, the VUM plan suggests investigating opportunities for additional non-river campsites to help satisfy visitor demand, prevent conflicts from non-river campers using river camping sites, and prevent the creation of unauthorized campsites, which damages park resources. Any expansion of backcountry camping opportunities would occur only in designated sites, as permitting backcountry camping to occur anywhere in the park would likely result in unacceptable impacts to park resources.

Concern Statement 2. Some commenters suggested expanding camping areas in the park. The McDade Recreation Trail was specified as a place that would benefit from campsite expansion. It was suggested that charging \$16 will help maintain the newly expanded campsites. Commenters suggested adding more remote and primitive campsites that can be accessed by hiking and biking.

Response. As stated in the response to Concern Statement 1, the plan describes the potential for additional non-river campsites. Opportunities for expanding hike-in or bike-in campsites would be explored in the mid- to long-term.

River Camping

Concern Statement 1. It was suggested that expanding river camping opportunities should not occur due to current lack of adequate law enforcement. Without management to enforce the rules and regulations, the new campsites would have negative impacts.

Response. It is true that expanding opportunities for river camping without additional river patrols by law enforcement could have adverse impacts to park resources through the creation of unauthorized campsites and trails. Therefore, NPS staff presence and roving patrols would be increased in the backcountry and along the river. In addition to the increased NPS presence, providing up to 20 additional river campsites would reduce visitor competition for them and reduce visitors' perceived need to create unauthorized campsites, thus improving protection of the park resources.

It should also be noted that river camping is a priority visitor experience to provide in the park. The opportunity to become immersed in a substantially undeveloped large river corridor in the most densely populated region of the country is central to the significance of the park and the river's status as a scenic and recreational river. Providing this opportunity is at the core of the park's mission.

Concern Statement 2. Some commenters oppose cluster camping. Camping so close to other people may hinder visitor experience, take away from the solitude that they value in the primitive river campsites, and prevent users from connecting with the land. Visitors want to "keep the park wild" and cluster campsites could have an impact on the environment. Visitors value the experience of camping in primitive campsites where they feel secluded and believe that cluster campsites will make the park less desirable for them. In addition, some commenters felt that there is a safety concern for cluster campsites, as visitors fear they will be more susceptible to theft of their belongings, among other things. Commenters encourage the maintenance of primitive campsites as opposed to the development of clustered campsites.

Response. The intent of the plan is to provide a range of different experiences for river camping. There are currently 65 authorized primitive campsites dispersed along the river that are available for use. The plan would add/restore up to 20 more campsites. The additional campsites would be constructed in clustered groupings, and the dispersed primitive sites would continue where feasible. The combination of dispersed primitive sites and slightly more developed clustered sites would provide a range of opportunities for visitors, some of whom prefer solitude and others of whom prefer being around others in a more social setting. The desire for this range of experiences was reflected in comments. In addition, the clustered campsites would provide improved facilities for human waste management and better protect the health and safety of campers and the river environment.

Concern Statement 3. A reservation system for river campsites was opposed by some commenters. Reserving a site requires one to get to that campsite by a specified time, which could be difficult, as the time it takes to travel along the river can be unpredictable. Commenters are also concerned about a reserved site being taken by another camper. Some stated that they enjoy the spontaneity of choosing whichever campsite they like when they arrive. Conversely, some commenters support the idea of having one or a few reserved campgrounds with the

majority being non-reservable. They suggested a campsite reservation system would enhance visitor experience.

Response. The National Park Service appreciates these concerns about the preservation of a positive visitor experience and will take them into consideration as the reservation system implementation strategy is developed and the new system is phased in over time. For example, the National Park Service could implement a system in which some sites require a reservation and others are first-come, first-serve. Alternatively, the National Park Service could implement a zone-based reservation system in which a visitor makes a reservation for a zone of campsites and chooses their individual site within that zone upon arrival on a first-come basis. These sample solutions would allow for the flexibility and spontaneity in campsite selection desired by some visitors, while also providing the predictability desired by others. These implementation-level details would be determined before executing the reservation system and will likely occur in phases to allow river users to adjust to the changes.

Concern Statement 4. Some commenters support the fee-based reservation system along the river; however, with a fee for river camping, they are expecting better maintenance of the campsites by the National Park Service. Every campsite should be accessible by motor vehicle for administrative maintenance purposes.

Response. The fees for river camping would help pay some of the costs to maintain the river campsites and an improvement in their condition is a goal of the plan. However, the fees would be unlikely to cover all the costs associated with these campsites. The current commercial use authorization fees also partially help support the river camping program. Improved maintenance of these campsites would be facilitated by easy access for maintenance staff, and the new clustered campsites would incorporate this ease of access. However, the National Park Service would also maintain some dispersed primitive river campsites to preserve visitor opportunity for more remote experiences.

Concern Statement 5. Primitive campsites that were lost to flood damage should not be reopened. Only new and sanitary campsites with environmentally and economically sustainable locations should be opened.

Response. As described in chapter 4, the number of official river campsites available for use has decreased due to flooding and limited funding and staffing to restore and maintain them. Demand for river camping, however, has not decreased, resulting in visitor conflicts and resource concerns. To alleviate this issue, the plan calls for the addition of up to 20 new campsites in clustered groupings. These will be in new locations and the sites previously lost to flood damage would not be reopened. These new/clustered sites will be placed in sustainable locations that incorporate ease of access for maintenance and use creative solutions for human waste management.

Concern Statement 6. Downed trees in the park should be cut and split for firewood for campers so that they do not have to search for dead and down wood for campfires.

Response. The National Park Service appreciates this suggestion as visitor-caused damage to vegetation is one of the issues identified in the plan. As noted in chapter 2, in many river

campsites campers have taken all of the downed wood they can find for campfires, or they have cut down live shrubs and trees, primarily saplings, when downed wood is no longer available. The park has recently expanded the area around designated campsites in which firewood may be collected from 100 yards to 300 yards. It is unlikely that park staff will have the capacity to split firewood and deliver it to river campsites, though this option may be considered. Alternatively, the National Park Service may also consider prohibiting campfires at campsites where vegetation has been heavily impacted or requiring campers to bring their own firewood. Visitors are encouraged to bring pre-packaged (treated for insects) firewood on their trips.

River Access

Concern Statement 1. Some commenters encourage the addition of river access points in New Jersey and associated facilities, such as a boat ramp, canoe access, picnic tables, bathroom facilities, trail access, a swim beach, and camping sites. Commenters stated that these additions would help alleviate the crowding in Pennsylvania. Conversely, other commenters do not want to see the New Jersey side of the river developed.

Response. Currently there are three river access points on the New Jersey side of the river, including boat access at Poxono and Kittatinny Point. The plan describes evaluating multiple locations on the New Jersey side of the river for the potential to create new river access points. Potential implementation of these new river access points would occur in the long term as funding is available.

Concern Statement 2. Commenters were concerned with visitor conflicts at boat-launch sites. Canoe and kayak access should be separate from motorized boat access, as the two are not compatible. The cement divider at the Smithfield Beach boat launch should be removed. Drop-off by Monroe County Transit Authority at the boat ramp should be discontinued because they transport canoes, kayaks, and bikes there and impede boaters from accessing the ramps. Tubers should also not be allowed to launch from boat ramps.

Response. The National Park Service recognizes these concerns regarding crowding and visitor conflicts at boat launch sites. These concerns are described in the visitor use and experience condition summary in chapter 2. The plan includes actions to address these concerns. For example, at Smithfield Beach, visitors would be redirected to other areas or vehicle entry would be actively managed (allowing new vehicles in when others leave) when the parking lot becomes full. Traffic flow would also be addressed to ease congestion, and a designated shuttle stop for Monroe County Transit Authority and other alternative transportation would be developed in the midterm. In the long term, the park would investigate separating the launch areas for motorized and non-motorized boats at Smithfield Beach and expanding the beach.

Trail Use

Concern Statement 1. Suggestions provided by commenters to reduce resource degradation from on- and off-trail use had two underlying themes: 1) improve design, layout, and construction of the existing trail system (which would only involve minor trail realignments); and 2) add new trails (e.g., loop trails, formalize social trails). Commenters also provided a variety of suggestions for new hiking trails.

Response. The plan looks at approximately 30 unique sites to improve the facilities and visitor experience consistent with overarching plan goals and desired conditions. Several sites, including the McDade Recreation Trail, Raymondskill Falls, and Van Campens Glen, have strategies for performing routine and/or deferred maintenance work on trails to improve trail tread or address other deficiencies. Sites such as Van Campens Glen and Hornbecks will have new trail construction to connect existing trails to other areas of the park. In some areas, trails will be rerouted to improve sustainability and reduce maintenance requirements. Informal sites/trails, or visitor-created sites/trails are indicators to be monitored as a part of this plan. Thresholds (i.e., the minimally acceptable condition for visitor-created sites and trails) have been set either parkwide or by zone.

Concern Statement 2. Visitor capacity should not be based on available parking spaces, but rather by identifying the appropriate analysis area (e.g., access site, parking lot, trail).

Response. Facility design, such as the number of cars that can be accommodated in a parking lot, is one factor that contributes to visitor capacity, but it is not the only consideration. Chapter 5 in the VUM plan describes in detail the process used to identify and implement visitor capacity, which includes the identification of analysis areas and consideration of limiting attributes.

Concern Statement 3. It was suggested that trails are disappearing because they are not being used and they are not easily accessible. Parking is an issue in areas such as Big Egypt Road and Blue Mountain Lakes.

Response. The VUM plan builds off the Trails Plan (2000) and seeks to provide a diverse range of visitor experiences consistent with the purposes for which the recreation area was established. The VUM plan identifies sites where visitor-created trails will be restored to natural conditions; however, no official trails are being restored to natural conditions. Chapter 4 identifies several priority sites, such as Blue Mountain Lakes, where existing trails will be improved. The old road traces off Big Egypt Road are proposed trails in the Trails Plan. Old road traces in the park are not official trails and the park has no plans to formally establish and maintain a trail network in this area. Informal sites/trails, or visitor-created sites/trails, are indicators of increasing use levels and will be monitored as a part of this plan. Thresholds (i.e., the minimally acceptable condition for visitor-created sites and trails) have been set either parkwide or by zone.

Concern Statement 4. The Appalachian National Scenic Trail is congressionally designated as a trail for foot traffic only. In areas where multiuse trails would occur near or cross the Appalachian Trail, this could cause issues, as visitors could become confused on which trails are open to mountain bikes. An example is the proposed mountain bike trails near Blue Mountain Lakes.

Response. The National Park Service appreciates the need for adequate signing for direction-finding. The plan includes strategies to improve trail marking to more clearly communicate designated trail paths, including for the Blue Mountain Lakes trail system.

Mountain Biking and Equestrian Use

Concern Statement 1. Some commenters expressed interest in expanding mountain biking opportunities in the park. They suggested that mountain bikers are known for maintaining trails, and some commenters offered their time to volunteer in the upkeep of new trails.

Response. The park is committed to evaluating and providing a range of visitor experiences including options for designating trails for multiuse and mountain bike use, and strategies for ensuring long-term maintenance of the trails through partnership with stakeholders in the mountain biking community. The park is interested in developing partnerships to help identify potential sites for mountain biking or horseback riding, including assistance for long-term maintenance of the trails through partnerships with stakeholders.

Concern Statement 2. Adding mountain biking trails would increase economic growth in the park and surrounding areas. Local bike rental companies, mountain biking tour groups, and an overall increase in visitor numbers will all be sources of revenue for the park and local business.

Response. The park will continue to evaluate options for designating trails and strategies for ensuring long-term maintenance of the trails through partnerships.

Concern Statement 3. Some commenters oppose expanding mountain biking opportunities and cited specific areas where they would not like to see mountain bikers, including Blue Mountain Lakes Trail and the narrow New Jersey side of the park. Concerns related to mountain bike use on the trails include safety and other trail users being displaced by mountain bikers. Commenters provided suggestions to accommodate mountain bikers in a manner that preserves their safety.

Response. Areas of the park will be evaluated for multiuse trails. Changes will be considered where permitting of these activities achieves and maintains desired resource conditions and visitor experience.

Concern Statement 4. Some commenters support multipurpose trails—where bikers and other trail users would all have access—as well as having designated mountain biking trails. Those who support expanding mountain bike access in the park suggested turning abandoned roads into bike trails. That would be a way to expand bike trails at a lower cost by making use of abandoned roads that are already suitable for bikes. Trails should be expanded and maintained for horseback riding in the park. Commenters proposed equestrian trails in the southern portion of the park and opening the fire roads to equestrian use.

Response. The park is committed to evaluating options for designating trails for multiuse and mountain bike use, and strategies for ensuring long-term maintenance of the trails through partnerships with mountain biking and horseback riding stakeholders. In the near term, no new trails will be added to the park's trail network unless funding and long-term maintenance partnership agreements would be feasible.

Hunting and Fishing

Concern Statement 1. Hunting in the park should be limited or banned. Commenters stated that hunting should be fully banned to protect wildlife. Commenters also stated that allowing hunting in the McDade Recreation Trail, is unsafe because this area is also a popular recreation site. Bear hunting should be limited because the population in the park has diminished since this activity was reinstated in New Jersey in 2003. The National Park Service allows hunting even when the state of New Jersey does not. Although the National Park Service can regulate hunting activities within the allowances of the states' limitations, the National Park Service should not consider allowing hunting on Sundays in the park. Retaining Sundays as nonhunting days would provide nonhunting visitors who avoid the park due to hunting concerns an opportunity to visit.

Response. Hunting is a key park experience that contributes to visitor understanding and appreciation of the park's purpose and significance. Hunting has long been associated with the area and is specifically called out as a required activity in the park's enabling legislation, Public Law 89-158. With required state licenses, hunting is permitted throughout the park during the state-specific seasons. Hunting is not allowed in areas designated as Safety Zones, on established/designated public roads and parking areas, or at over 30 developed areas and/or trails listed in the Compendium of Park Regulations. The park will evaluate changes in state regulations, such as allowing hunting on Sundays, and determine whether they will be applied in the park on a case-by-case basis.

Closure of Sensitive Areas

Concern Statement 1. The National Park Service should consider other management strategies for sensitive areas, instead of full closure. Suggestions offered include seasonal closures, guided interpretive hikes throughout the year, and permit systems to manage sensitive areas. Commenters stated that the park was established as a recreation area, and resource management should not override the park's directive per its designating legislation to provide for recreation opportunities. It was suggested that the closures do not need to be included in the VUM plan, as closures for resource protection have always been a management strategy.

Response. In response to public comment and concerns about access, the plan has been updated and the full closure of some sensitive areas is no longer included as an immediate management strategy. Temporary closures for resource protection will continue to be a management strategy on an as-needed basis.

It should be noted that the park's enabling legislation and status as a national recreation area does not mean that recreation should be prioritized over resource protection or that resource protection should be overridden. All NPS units, no matter their name, are managed in accordance with the same laws, regulations, and policies. The National Park Service Organic Act states the purpose of park units is "to conserve the scenery and the natural and historic objects and the wild life therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations." Subsequent legislation, including the General Authorities Act of 1970 and the Redwood Amendment of 1978, have clarified that all areas that are part of the national park system should be managed

with equal protection of park resources, and that no action should be taken in any of those units that might impair those resources.

Concern Statement 2. Some commenters are opposed to the closing of the Karamac area, Adams Creek, and Childs Park. They suggested that closures at areas such as Adams Creek present an access issue for responsible visitors. Commenters made a variety of suggestions that could be implemented to avoid closure of sites to all visitors.

Response. The use of temporary closures in order to protect sensitive areas and public safety will continue to be used as a management strategy on a case by case basis and communicated with the public through the superintendent's compendium. In the case of sites like Adams Creek the parking and trail access to this part of the park will not be maintained. Repairs to Childs Park are planned for the next several years. Once the damage to the trail system is repaired this site will be reopened to the public. All these areas will be monitored and patrolled by park staff to evaluate their condition and the effectiveness of the management strategies identified. Additional actions to better protect the sensitive resources and public safety in these areas will be put in place as needed. See pages xx, xx, and XX for a full description of the plan actions for Karamac, Adams Creek, and Childs Park respectively.

Interpretation and Education

Concern Statement 1. The National Park Service should increase signage for the park. Because there are so many entry points, visitors often do not realize they are on park property. Informational and interpretive signage could include park boundaries, trail markers (blazing), interpretive plaques for identifying plants and wildlife, rules for campgrounds, historical markers, safety information at swimming areas and for recreating in bear country, and information on what to do if archeological resources are found. Camp Hidden Falls and Mt. Tammany were specifically mentioned as areas that could use signage to relay information. Signage could identify Route 209 as a scenic and historic drive, and signage could specifically be placed on I-84 directing visitors to Route 209. Conversely, it was suggested that advertising an area—such as Adams Creek, which was not a popular area until the National Park Service provided better signage to the area—could bring unwanted attention to it.

Response. This plan seeks to modernize and strategically locate education and interpretation services and enhance park identity. As part of the comprehensive programmatic strategy for visitor information and education, actions in the plan include increasing contact with park staff, identifying interpretation/education volunteer and internship opportunities, and centralizing interpretation and education services. The national park experience will be enhanced with more visible park operations, such as increased signage. The visitor experience will be improved by linking trail networks, enhancing accessibility, increasing the diversity of trails, and developing additional camping and picnicking opportunities. Site identification and wayfinding signs would be added to locations such as trailheads, where appropriate, to contribute to creating a national park presence and improve park identity.

Concern Statement 2. Printed materials, such as maps, should be readily available to the public in multiple places, given the large number of entry points to the park; these same materials should be available online. Informational materials and in-person interactions with rangers are

important to describe the types of recreation opportunities available, such as orienteering and visiting waterfalls. Information on the park's history, geology, and other resources should be presented at visitor centers. There should be visitor centers at both the north and south ends of the park, and the park should have a museum to present the park's history. Commenters also supported virtual and mobile visitor centers. Interpretive programs should be made available at a variety of times to accommodate vacationers as well as locals who may be working during the day. The park should work with local colleges and local tribes to expand educational opportunities. Ranger-led programs could introduce smaller groups of people to sensitive areas of the park without leading to resource damage. Visitors should not have to pay for interpretive programs.

Response. This plan seeks to modernize and strategically locate education and interpretation services. As part of the comprehensive strategy for visitor information and education, actions in the plan include increased contact with park staff by focusing staffing in the field, improved virtual access to information, increased interpretation/education volunteer and internship opportunities, digital media and targeted publications outreach, distance learning, and centralized interpretation and education services.

Concern Statement 3. Some commenters suggested that the park should work with partnering organizations to educate visitors about opportunities to explore the history of neighboring communities.

Response. This plan seeks to modernize and strategically locate education and interpretation services. As part of the comprehensive strategy for visitor information and education, actions in the plan include increased contact with park staff by focusing staffing in the field, improved virtual access to information, increased interpretation/education volunteer and internship opportunities, social media and targeted publications outreach, distance learning, and centralizing interpretation and education services. The National Park Service will continue to work with partners to create education opportunities.

National Park Service Staffing and Law Enforcement

Concern Statement 1. Some commenters noted that law enforcement and NPS staffing at the park is inadequate for the number of visitors and the amount of crowding in certain areas of the park. A lack of funding, and therefore a lack of law enforcement/staff, has created the current conditions. Commenters suggested areas of the park where additional staffing is needed and provided suggestions for improving law enforcement in the park.

Response. This plan is looking at ways to find creative solutions to focus staffing in the areas where they are needed the most such as, utilizing staff in targeted high use areas to provide visitor information, orientation, and informal interpretation. A portion of revenues from fees collected may be used to increase staffing levels in key areas to support visitor services in the park as long as the requirements related to fee policy are met.

Concern Statement 2. It was suggested that fees should fund sanitation crews and additional law enforcement to clean up and prevent the trash and graffiti associated with drugs and alcohol

issues in the park. The National Park Service will need additional staffing and law enforcement to successfully implement the VUM plan.

Response. Trash, graffiti, as well as drug and alcohol use are all serious concerns that affect the safety of visitors and the condition of park resources. Additional funding generated by any changes to the park fees could potentially help fund efforts to address these and other issues in the park. The National Park Service is aware that education coupled with law enforcement would be necessary to successfully implement many elements of the VUM plan.

Concern Statement 3. The National Park Service should pilot programs that enlist volunteers or other non-NPS staff to run visitor centers, monitor areas, or conduct maintenance. Examples of this include Redwoods National and State Parks; Cuyahoga Valley National Park; and the Trail Steward Program run by Adirondack Mountain Club, Appalachian Mountain Club, and New York–New Jersey Trail Conference. Jobs that are currently completed by rangers, such as working the pay booth at Smithfield Beach, could be performed by part-time employees.

Response. The National Park Service leverages the support of volunteers, interns, and other partners to support many critical functions at the park such as staffing visitor centers, picking up litter, maintaining trails and historic buildings, assisting visitors, and leading education programs. While these non-NPS staff are the margin of excellence, some functions are inherently governmental, meaning they must be completed by NPS employees. Law enforcement is an example of such an inherently governmental function. The park employs seasonal workers for maintenance, fee collection, interpretation, and law enforcement during the summer. The park will be following specific guidance for the recruitment and placement of volunteers in appropriate volunteer roles according to Director's Order 7 and the associated reference manual.

Concessions

Concern Statement 1. Commercial use authorization (CUA) holders do not want to transition to concessionaires because they are concerned about competition from companies that are not local, do not have the community's best interest in mind, and are not concerned about conserving resources. Some of the CUA holders have been servicing the park's visitors for many years.

Response. Chapter 3 of the VUM plan provides an overview of commercial visitor services within the National Park Service. The plan does not require that CUA holders transition to concessioner operations, but it presents an evaluation of activities that the park may consider offering through a concession contract in the future. These future considerations may be accomplished in consultation with park management and interested parties.

Concern Statement 2. Some commenters suggested that it would be beneficial for some concessions to occur in the park and provided a variety of suggestions for concessions. Other commenters do not want to see concessions in the park.

Response. The park currently has concession contracts and CUA holders that operate in the park to provide commercial visitor services such as Dingmans Campground Concession and

multiple canoe livery operations. The park plans to continue using these platforms to help provide visitor services. Chapter 3 of the plan evaluates current, potential, and appropriate commercial visitor services based on agency policy and guidance.

Accessibility

Concern Statement 1. Visitors are pleased with efforts to make more areas of the park accessible. Commenters stated that the pit toilets and boat ramps should be made accessible. It was suggested that the use of electric pedal-assist two- and three-wheel human-powered cycles should be permitted on park roads and the McDade Trail, especially for use by elderly or physically disabled visitors.

Response. The National Park Service appreciates the public support in the pursuit of greater accessibility. This plan seeks to provide and improve universal access at key locations to offer a range of recreational opportunities throughout the park for a variety of users. Per the Electric Bicycle Policy released by the National Park Service on August 30, 2019, e-bikes are permitted for use in the same manner as traditional bicycles. This includes use on park roads, paved or hardened trails, areas designated for off-road motor vehicle use, and administrative roads where traditional bikes are allowed. Superintendents retain the right to limit, restrict, or impose conditions of bicycle use to ensure visitor safety and resource protection.

Management Strategies

Concern Statement 1. Some commenters stated that visitors would benefit from expanded transportation services in the park and provided a variety of suggestions. The current shuttle information could be used to determine where and how the services could be expanded. Commenters asked about the capacity of the parking lots at shuttle stops, as the locations are not shown on the maps in the plan, and inquired about what facilities would be available at the parking areas.

Response. Alternative transportation options are included as near- and mid-term actions in the plan (see page 68). Near-term actions include continuation of the shuttle partnership with the Monroe County Transit Authority and investigating funding opportunities to continue and expand the shuttle service. Mid-term actions include expanding the shuttle operation, improving shuttle stops, and implementing appropriate suggestions from prior transportation studies as funding becomes available.

Concern Statement 2. The National Park Service should engage in partnerships with local towns and communities to create a relationship that would be beneficial for all. Commenters are concerned about the lack of communication and cooperation by the National Park Service. Community plans and grants should be included in the revised VUM plan. Commenters stated that the park should solicit meetings and input from bordering municipalities, members of the communities, elected officials, and nonprofit organizations. The park should explore successful NPS partnership models around the nation and model their management in the same manner.

Response. The park is committed to working with its partners and neighboring landowners and stakeholders. The park operates in cooperation with many organizations, including park and

river organizations along the Delaware River. Management through collaboration is an important resource and value of the park, as described in the Foundation Document, available at <https://parkplanning.nps.gov/document.cfm?parkID=220&projectID=56278&documentID=63325>. Enhancing partnerships is a key component of the VUM plan, including strategies related to mountain biking and equestrian trails, education and interpretation, hunting and fishing, and transportation.

Concern Statement 3. The park should have its own emergency services, given the size of the park (spanning 5 counties and 24 municipalities) and the large number of visitors. The emergency services from surrounding communities should be compensated for servicing the park. Emergency services are often provided by volunteers and paid by local taxes and fundraising efforts.

Response. Per Public Law 94-565, the federal government submits Payments in Lieu of Taxes to local governments to help offset losses in property taxes due to the existence of nontaxable federal lands within their boundaries. National Park Service Management Policy 8.5.2 outlines visitor safety to which the National Park Service adheres. The policy includes providing a safe and healthful environment for visitors and employees, while recognizing that there are limitations on its capability to eliminate all hazards. The plan's fee change proposal supports increased staffing and patrols to provide emergency response and enforce park regulations.

Concern Statement 4. The National Park Service should refurbish and reuse any viable historic buildings, such as the Brodhead Wheat Plains farm building, Turns Store, historic structures at the Peters Valley School of Craft, the Dutch reformed church in Bushkill, the Foster-Armstrong House, and the Nelden-Roberts Stonehouse. Any structures in very poor condition should be demolished.

Response. A concurrent historic properties prioritization strategy is in process and will contain strategic maintenance and preservation decisions for the approximately 311 historic structures remaining in the park. For more information on this plan please see [\[https://parkplanning.nps.gov/projectHome.cfm?projectID=62667\]](https://parkplanning.nps.gov/projectHome.cfm?projectID=62667)

National Environmental Policy Act/Plan Process

Concern Statement 1. The VUM plan should have an environmental impact statement prepared to assess the impacts of the proposed management strategies at the park and comply with the National Environmental Policy Act (NEPA). The strategies in the VUM plan should be carried out through the general management plan. The plan should include a robust cost/benefit analysis, as well as a full evaluation of alternatives. The draft plan does not include an evaluation of possible alternative ways to accomplish the NPS's stated goals of increasing revenue for improvements and encouraging appropriate recreation site selection and visitor dispersion.

Response. The VUM plan would change and amend portions of the park's general management plan from 1987. Chapters 4 and 5 of the VUM plan detail proposed actions that require NEPA review. The NEPA compliance pathway for the VUM plan will be a categorical exclusion that covers "changes or amendments to an approved plan, when such changes would cause no or only minimal environmental impact" (categorical exclusion B.1). Changes to the general

management plan in the VUM plan include adding/defining visitor capacities (see VUM plan chapter 5), refining the park management zones (see VUM plan chapter 3), and identifying specific management actions (see VUM plan chapter 4). These management actions address current issues and facility deficiencies in order to meet the demands of current visitor use and to protect natural, cultural, and scenic resources. In chapter 4 of the VUM plan, individual management actions are divided into site-specific near-, mid-, and long-term actions. It is anticipated that near-term actions (implementation within the first 5 years) will fall under categorical exclusions. The National Park Service has determined that the plan would result in only minimal environmental impacts, and no extraordinary circumstances apply that would preclude the use of a categorical exclusion.

The VUM plan makes programmatic decisions, therefore additional NEPA compliance will be necessary for some of the actions in the plan. During the detailed design phases of the more complex, site-specific, or connected actions, additional compliance will be needed and could include the development of appropriate compliance pathways, consultation with other government agencies and tribes, permitting, and additional public engagement. Those compliance processes will be initiated at the time when the National Park Service is ready to begin planning and designing those specific projects.

Concern Statement 2. Some commenters state that the planning processes are too lengthy and referenced the Historic Structure Management Plan for the park. The National Park Service should collaborate more with the public, local experts, and other stakeholders to gather data and opinions. Specifically, the decision on fees should be delayed until a more inclusive public dialogue can be convened among local stakeholders to ensure that equitable decisions are achieved and a distinction between a road toll and user fee is maintained. More public meetings in different locations are necessary to reach more interested parties.

Response. One of the primary goals for this project was to pursue intentional and high-quality public involvement on this planning effort. In spring and fall of 2015, the National Park Service held a series of public and stakeholder meetings. The purpose of these meetings was to educate the public on the planning process and share preliminary ideas for improving access and resource protection in the park. The proposed fee change was included as a potential strategy at this time. During this time, roughly 400 individuals attended meetings and over 600 letters were submitted to the National Park Service about this planning effort. All comments were carried forward and informed the development of final strategies included in the draft VUM Plan.

The release of this draft plan included a public comment period where the National Park Service received 850 individual letters with comments about this plan. In addition, NPS staff had contacts with over 2,500 individuals through informal in-park meetings and other public meetings.

Visitor Use Data

Concern Statement 1. Some commenters questioned the statistics used in the VUM plan, stating that a large number of people drive through the park but do not use the park. Some of the roads inventoried are major thoroughfares. The method of estimating the visitor count has changed since the general management plan was released and the different methods could skew

the increase in visitation. Visitors had a variety of additional concerns regarding the visitor use data used in the VUM plan.

Response. As a part of the Visitor Use Management Planning process, the NPS park staff in collaboration with NPS Social Sciences office, updated the public use counting and reporting instructions in 2018. For more specific details about the park's counting methodology visit <https://irma.nps.gov/STATS/Reports/Park/DEWA> and select the Visitor Use Counting Procedures link to view counting instructions for the park, including how non-recreation visitation is addressed in these counts. The visitation numbers reflected in the plan are a part of newly updated visitor counting assumptions since the general management plan was released. Further, the inductive loop traffic counters are strategically located throughout the park to report accurate visitor counts.

Concern Statement 2. The stated assumption that visitors select certain sites to avoid paying fees is not supported in the data provided in the plan; therefore, the rationale for widespread park user fees to improve visitor dispersion is unsubstantiated. Crowding is cited as a problem, yet the survey data report less than 10% of visitors indicated a problem with crowding.

Response. In general, the National Park Service used data to inform the decision-making process. These data are used in combination with a variety of other important considerations including resource conditions, emergency response, and operational considerations. The park decision stated under the Fee Change Proposal is not linked to visitor data directly. The rationale for the fee change is related to the implications of fee avoidance that result in inappropriate site selection. See the full text below from the plan.

The VUM plan states the following in the Fee Change Proposal section:

Currently, some visitors select recreation sites to avoid paying fees. This type of site selection avoids criteria for appropriateness for visitors desired activities. This has created a situation where visitor use occurs in locations that are not designed for that type of use (i.e., swimming at boat launches or picnicking at trailheads).

Visitor perceptions of crowding and manager responses to crowding are treated as two separate challenges the VUM plan seeks to address. As the concern statement notes, visitor perceptions of crowding are low at the park and are similar to other studies conducted at other NPS units. However, as the plan references throughout, the results of crowding can negatively impact the visitors experience, and natural and cultural resource conditions. The VUM plan is needed to address a wide range of uses associated with growing visitation and changing visitor use patterns.

Concern Statement 3. The plan compares the federal budget of the park (35%) to that of other parks, such as Olympic National Park and Grand Teton National Park (57% for each of these parks), without explaining that the other parks have received incremental increases over 19 years. This omission skews the plan by insinuating that the financial deficit must be resolved by raising fees to the public.

Response. The VUM plan aligns Delaware Water Gap National Recreation Area's visitation to that of the top 20 to 30 most-visited parks in the NPS system, with other parks such as Acadia National Park, Olympic National Park, Grand Teton National Park, Glen Canyon National Recreation Area, and Glacier National Park having similar visitation patterns. Research for the VUM plan identified visitation as highest in the summer and lowest in the winter and identified use levels at key visitor sites as frequently high during peak use times and days during the summer season.

Visitor Use Management Plan Revisions

Concern Statement 1. Some comments suggested changes to and clarifications of the zoning descriptions and maps in the VUM plan.

Response. The current zoning as defined in the 1987 general management plan is outdated in some areas and no longer accurate or reflective of the park's management strategies. In the more than 30 years since development of the general management plan, inventories of the park's resources have occurred, providing managers with much more information than was previously available. In addition, visitor activities and experiences have changed, as well as some NPS policies. In some cases, the zoning does not provide sufficient detail to inform the decisions of park managers regarding appropriate visitor uses and resource conditions. Therefore, this plan edits the zones and descriptions to clarify the context and direction for these zones. The earlier zone descriptions can be found in the general management plan. A description of the zoning update needs can be found in the VUM plan on page 34.

Concern Statement 2. The role of historic structures and other cultural resources in the plan and the relationship to the historic properties prioritization strategy was questioned by commenters.

Response. The park is developing a historic properties prioritization strategy that would contain strategic maintenance and preservation guidance for the approximately 600 historic buildings remaining in the park. The number and condition of the historic structures far exceeds the park's funding and maintenance capabilities. As a result, a long-term strategy is needed to prioritize maintenance and management of the historic properties. This historic property strategy will include determinations on which of the park's historic properties are suitable for new or additional visitor use and a process for reevaluating properties if conditions change. A change in condition can include changes in visitor use, needs, or patterns.

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