



c/o Delaware River Greenway Partnership
PO Box 15, Stockton, NJ 08559

www.lowerdelawarewildandscenic.org
www.facebook.com/lowerdelawarewildandscenic.org

October 13, 2022

Dear Mayor Herb and Planning Board Chair Matthews,

RE: Jaindl Warehouse

White Township is located on a federally designated Wild and Scenic River, which is preserved in a free-flowing condition for the enjoyment of present and future generations for its outstanding natural, cultural, and recreational values. The Lower Delaware Wild and Scenic Management Council is a collaborative group that together addresses issues along the River, and is comprised of members of local municipalities, nonprofits, and state and federal representatives. We understand that White Township is in a critical moment of determining how to build economic growth while also balancing the needs of the community and other opportunities that come with its land and water resources.

The council would like to identify possible issues, and opportunities relating to the Jaindl project that can affect the River community as a whole, and to comment on a few important things to consider.

We invite you to consult with the National Park Service (NPS)

Any work on the River which necessitates Clean Water Act permitting would require consultation with the National Park Service for water resource project reviews under the Wild and Scenic Rivers Act. Further, any project involving other types of federal assistance might involve National Park Service consultation should the project affect critical viewsheds or otherwise affect wildlife or recreation.

Sewer Capacity

The massive sewage disposal field is planned for an area with a long history of sinkhole formation. The project proposes to infiltrate stormwater runoff over the highly-erodible karst leading to additional sinkholes and underground erosion. Increased potential for sinkholes can undermine the foundations of the proposed warehouses, area roads, and the small, remaining farmland. Ten infiltrative detention ponds will concentrate stormwater in small areas contrary to NJDEP guidelines. It will be directing partially treated contaminated runoff to groundwater where highly erodible carbonate rock exists. Sinkholes may undermine the ponds.

Environmental Impacts

The project is in an area containing an abundance of natural features including wetlands, riparian buffers, steep slopes, and woodlands. We recommend the Township ensure that any impacts to the environment generated by the development are completely studied to minimize the environmental impacts of development.

The proposed bioretention ponds are questionable efficiency for removing dissolved solids such as road salts. Sixty acres of impervious parking area will require salt treatment in the winter. Per NJDOT guidance, expect 288 tons of salt to be spread annually, some will end up in the recharge ponds, and some will escape to the Delaware River outfall from the detention ponds.

The plan will have impacts on the nearby Delaware River as well as the adjacent Buckhorn Creek that borders the southern side of the development. As a category 1 waterbody, the Buckhorn receives special protection. If wastewater goes into Buckhorn Creek, there will be a measurable difference in water quality.

The potential for excessive stormwater runoff due to the planned impervious cover, the lack of public sewer and public water infrastructures, and the sheer size of the development will negatively impact the Delaware River's water quality. Moreover, an existing vernal pond supporting frogs and salamanders will be obliterated.

Landscaping & Effective Stormwater Management

Substantial supplemental landscaping should be required along the River to create additional buffering, which is vital to slow down and filter stormwater runoff before it enters the river. Limit the amount of tree and vegetation removal along the River. These two actions will help to control flooding. Assign the greenspace required in the Township development ordinance to be primarily adjacent to the River between the development and the Riverbank.

Carefully examine the impacts of increased impervious cover, tree removal, and soil erosion along steep slopes. Ensure that the development will not have any negative impacts on River water quality during construction and into the future. Refer to page 26 of the Lower Delaware Management Plan:

<https://www.lowerdelawarewildandscenic.org/index.php/resources/documents/lower-delaware-wild-and-scenic-management-plan>.

This document's goals require the following actions to maintain existing water quality in the Delaware River and its tributaries from measurably degrading and improve it where practical.

Policies: (1) Achieve the highest practical state and federal water quality designation for the River and its tributaries. (2) Manage point discharge and stormwater nonpoint runoff to minimize degradation of the River. (3) Encourage the use of Best Management Practices in the areas within the River corridor to minimize water quality degradation from stormwater runoff. (4) Encourage the use of Best Management Practices for activities other than agriculture that could result in water quality degradation from stormwater runoff. (5) Discourage inappropriate development in the floodplain, wetlands, steep slopes, and buffer strips along the Lower Delaware River and its tributaries.

In addition, our Stewardship Handbook can be found at

<https://www.lowerdelawarewildandscenic.org/index.php/resources/documents/guides/stewardship-handbook>.

Pages 10-15 of the Handbook also include commentary about stormwater management and water quality.

Building Height Reduction

Extreme heights of buildings that will tower over the River destroy the viewshed. Approve scaled-down structures that will not destroy the scenic values of the river.

Viewshed from the River

To assess what impact the development will have on the viewshed from the River, we recommend that the Township require clear renderings of the project. Renderings of the development should be required from the following viewpoints:

- The development towards the River,
- The Pennsylvania side of the River towards the development,
- The River directly in front of the development looking up,
- The River at locations North and South of the development.

Opportunities

River Recreation has been on the rise.

The River offers scenic and recreational potential, a huge economic opportunity for White Township. The Lower Delaware Wild and Scenic River saw unprecedented recreation use over the past two years. State Park facilities and tubing operations could not keep up. Paddling is the most popular and growing recreation activity. We welcome having additional conversations with you about the potential to protect the River while growing the economy.

Partner with Governmental Entities and Nonprofits

See the potential in collaborating with the Lower Delaware Wild and Scenic River Council, PA DEP, PA DCNR, American Farm Trust, or smaller, more local organizations such as the Heritage Conservancy to explore the recreation potential of land along the River, accesses to the River, possible parks, and the like. Our Council would be glad to be a resource to the Township to support sustainable economic growth while protecting critical viewsheds. We have some funding for planning and other needs and have links to technical expertise through the National Park Service.

Thank you for your valuable time and consideration. We hope we can be helpful as White Township examines the anticipated development. Please advise Lower Delaware when site plans are submitted to the Township.

Sincerely,

Richard Dodds

Chairman

cc: Sarah Bursky (Sarah_Bursky@nps.gov), Lower Delaware National Park Service Liaison