



WHITE CLAY CREEK National Wild & Scenic River

Ours to Enjoy. Ours to Protect.

August 2, 2019

William D. Miller III
Planner, Parks Resource Office
DNREC-Div. of Parks & Recreation
89 Kings Hwy
Dover, DE 19901

Reference: White Clay Creek Draft Master Plan

Dear Bill,

On behalf of the White Clay Wild and Scenic Program I would like to submit the following comments on the draft master plan. Thank you for all the time spent drafting this plan. It is clear that a lot of effort was put into this plan and we appreciate the time you spent over the past few years meeting with the public to gather feedback and share drafts.

It is clear that the Nature Center Area is of high priority in the plan as it should be given the history of the park. We fully support preserving the story of the watershed and how the park was formed via a history display/cultural center in the Chambers and/or Robinson House since these two buildings help illustrate that story and preserve the legacy of some of the watershed's staunchest proponents. We are however concerned about the Robinson house becoming staff housing or a yearly rental, as this use would diminish the hands-on experience visitors get by standing atop the valley at the Robinson House after walking up from the Chambers House while learning about the proposed dam and reservoir. We understand the need to plan for growth in terms of educational facilities that can accommodate large school groups and hope that the current education staff input receives the most weight in determining the need for a new facility. Access to the nature center area is also compromised. Currently, it is inadequate and difficult to maneuver, and the bridge is often lifted off its abutments during flood events. We support a feasibility study to see if alternative entrances would better serve the area that would be less susceptible to flood damage and if so, turning that portion of creek road into a pedestrian/bike trail.

While we generally do not oppose the idea of camping in White Clay Creek State Park, we cannot currently support the proposed camping area near/on Krantz farm. It was unclear how this would affect the operations of the current occupants, Omnia Humanitas or how this proposed new use conflicts with the conservation easement already on the property. It is also adjacent to the future nature preserve area, and more development uphill of this area could have a negative impact on quality habitat. We realize you are in the preliminary planning for this area, and hope that you take these concerns into consideration and look to another area of the park that could better accommodate low impact camping.

Additionally, the 2019 Trail Plan states that there will be an additional 8.2 miles of trails added to the system. We understand the need for new connectors from Judge Morris to the main park, as well as the need for some reroutes to increase the sustainability of the

trails, but we are concerned about some of the trails, particularly those near or in Carpenter Recreation Area, and whether these would create further fragmentation and invasive species intrusion into areas with healthy existing habitat. The trail plan also stated a 40% increase in paved trails (or an additional 5.1 miles). We hope that you balance environmental impacts with user needs when considering resurfacing with pavement, as well as considering the use of porous pavement instead of macadam in areas where this is feasible. We recommend additional outreach, explain why macadam is needed with regard to handicap usage, long-term maintenance benefits, etc. The general public tends to look at macadam trails negatively because they are not familiar with all you consider when identifying a macadam trail.

The “Big Pond” area does not appear to be a priority in the plan at this time, however, we would like to make it very clear that we have serious reservations regarding the reconstruction of the former pond. The dam has been breached for several years, and the old footprint may now be jurisdictional wetlands, further complicating things. We would support any efforts to restore the area to its natural pre-pond state and would be willing to seek out grant funding to conduct a study to look into the feasibility and best options for restoring it back to its natural channel. Those in support of restoring the pond, stated at the open house that the pond if restored could be used for people and veterans with disabilities. This need has already been met in the park and therefore, that should not be a primary reason to restore the pond. It also violates the main premise of the Wild and Scenic Rivers Act, to keep streams in their free-flowing state, free of impoundments. The cost to excavate the footprint of the former pond to the depth some of commenters want, is very expensive and there are numerous areas where such funds could be better spent.

Finally, there were new initiatives set forth in this plan that may require additional program funding to ensure their maintenance and success. We hope that DNREC has considered what those needs might be and how to fully fund adequate staffing to support those initiatives.

There are *several* components of the plan that we support, and would welcome the opportunity to assist or partner with DNREC on plans for water quality monitoring, inclusion of more waysides for historic sites and natural features, review of agricultural land management and policy in the park, and forest habitat improvement projects. You are welcome to present and seek feedback on any parts of the plan at our quarterly meetings at any time during this process and during plan implementation. We thank you again for taking our comments into consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'SM', written in a cursive style.

Shane Morgan
Watershed Coordinator