



December 31, 2019

Mr. Paul Zeph  
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Bureau of State Parks  
Planning Section  
P.O. Box 8551  
Harrisburg, PA 17105-8551  
*Submitted via email to:* [pazeph@pa.gov](mailto:pazeph@pa.gov)

Dear Mr. Zeph:

Delaware Riverkeeper Network (DRN) is writing to provide comments to DCNR on the preliminary “Penn’s Park For All” draft report (Report). In 2017/2018 DRN participated and helped distribute and share info about the ongoing DCNR surveys that were part of this effort. We provide these comments on the preliminary report for consideration to help shape the final report and the vision for the next 25 years of planning since DCNR’s Bureau of State Parks underwent its last strategic planning effort – State Parks 2000. State Parks 2000 guided state park improvements, including:

- The modernization of facilities
- Expanding environmental education program offerings
- Designating natural areas in parks to better protect sensitive or special natural resources

The goal of the new strategic planning process -- Penn’s Parks for All -- is to help guide Pennsylvania’s state park professionals in carrying out the important work of caring for the 121 DCNR managed state parks and natural areas that consist of 300,000 acres for the next 25 years here in Pennsylvania. Since 1970, 36 more state parks have been added to the system with 81,000 additional acres to manage, and millions of more people visiting the parks annually. From 1970 to 2018, there are more than 10 million more park users using this system of state parks – in 2018, 39 million people visited Pennsylvania state lands. The total number of state park staff, however, has decreased over that same time. And according to the preliminary Report, state parks receive only 0.16% of the state’s General Fund budget. PA Act No. 51 of 1981 directed that all fees collected by state parks would be deposited into a restricted fund to be used solely by the Bureau “. . . for the acquisition, maintenance, operation or administration of the state parks . . .” which provided a sustainable funding source for major maintenance of park facilities. Starting in 2002, however, the Bureau’s general revenue funding was reduced by a directive that the Bureau use its dedicated fund for operational costs such as salaries and other non-maintenance budget gaps. This lack of sustained investment to our common natural lands and parks does not make sustainable, healthy or economic sense and the legislators need to restore and increase budgetary funds to fully fund our parks and forests. In 2012, an

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analysis of the economic value that state park visitors contribute to Pennsylvania's economy was conducted by Penn State University.<sup>1</sup> This analysis showed that the annual primary and secondary economic contribution includes: 12,630 jobs (part-time and full-time), \$400 million in labor income, and \$1.15 billion in sales. **For every \$1 invested in state parks from the state's General Fund \$12.41 is returned to Pennsylvania's economy, according to the Report.** Fully funding DCNR parks is critical. Legislators could start to restore funding by taking subsidies now provided to the fossil fuel industry and allocating part of that funding to the state forest and park system as well as sustainable renewable energy development which is the future. Instead, on Sept. 19th, 2019 the Pennsylvania House of Representatives voted to give the already heavily subsidized natural gas and petrochemical industry: a 20 percent tax break to companies that build petrochemical facilities that turn natural gas to plastics and other products. According to a 2015 report by Pennfuture, over a third of Pennsylvania's roughly 2 million acres of State Forest land is already available for oil and gas development, either because it has been leased by the Department of Conservation and Natural Resources or because oil and gas rights are now owned by the Commonwealth.<sup>2</sup> Providing fossil fuels developers (natural gas, coal, oil) with access to publicly-owned lands for purposes of fuel extraction and development is not in itself a subsidy but it is sacrificing the ecological and economic sustainable value these forests and lands provide. DRN is not in support of a severance tax on gas drillers as we support a full ban and phase out on any unconventional drilling; we believe that is the only logical science-based and sustainable choice. According to DCNR's 2018 Monitoring Report, since 2010, no new leases have been issued for natural gas development in state forests. In 2015, at the recommendation of the DCNR Secretary, this policy was formalized by Governor Wolf in an Executive Order. The Order stated that in order to protect the lands of the Commonwealth held in trust for its citizens and future generations no State Park and State Forest lands owned or managed by DCNR shall be leased for oil and gas development. None-the-less, significant tracts of state forest land remain subject to development due to severed mineral rights or leasing prior to 2011.

Pennsylvania provided more than \$3.2 billion in fossil fuels subsidies during fiscal year 2012-2013. The vast majority of these subsidies came in the form of tax breaks; about 2 percent was provided by direct spending through grants and market support. Additional subsidies not included in the \$3.2 billion figure exist through a host of legacy funds and economic development programs. To provide context, this subsidy value broken down by contribution by each Pennsylvanian (based on 12.7 million people) and by Pennsylvania taxpayer (based on approximately 4.1 million Pennsylvania tax filers) equated to \$256 per Pennsylvanian, in fiscal year 2012-2013 and \$794 per Pennsylvania taxpayer, in fiscal year 2012-2013.<sup>3</sup>

DRN agrees that restoration of the dedicated fund established in the early 80s in addition to environmentally friendly budget increases would be a wise and sustainable community investment for all Pennsylvanian's and help ensure our collective common natural places, environmental "green capital" and state forest lands are better preserved, protected and kept safe. DCNR notes in the Report that with these gaps in investment since 2002 and a "societal climate of wanting smaller government", has made it increasingly difficult to manage the system in a way that provides an enjoyable and safe experience for all visitors, while also properly caring for the recreational, natural, and cultural resources that attract visitors to the parks with fewer park staff and less maintenance for improvements.

Sustaining, preserving and managing our public lands takes funding and it should be allocated. The Report outlines a long list of maintenance and backlog needs as the legislature has not been investing in the upkeep and preservation of our common and important natural areas and parks. Needs listed below:

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<sup>1</sup> The Economic Significance and Impact of Pennsylvania State Parks, Penn State, 2012  
[http://www.docs.dcnr.pa.gov/cs/groups/public/documents/document/dcnr\\_007019.pdf](http://www.docs.dcnr.pa.gov/cs/groups/public/documents/document/dcnr_007019.pdf)

<sup>2</sup> Fossil Fuel Subsidy Report for Pennsylvania, PennFuture, 2015.  
[https://www.pennfuture.org/Files/News/FossilFuelSubsidyReport\\_PennFuture.pdf](https://www.pennfuture.org/Files/News/FossilFuelSubsidyReport_PennFuture.pdf)

<sup>3</sup> Ibid

Overnight facilities - includes campgrounds, cabins, inns, camping cottages, and associated buildings (bathhouses, restrooms, etc.) - Approximate need is \$48 million

Outdoor Recreation Facilities – includes restrooms, pavilions, pools, trails, playgrounds, picnic areas, ski areas, marinas, etc. – Approximate need is \$200 million

Resource Management – includes management of invasive aquatic and terrestrial plants, habitat restoration, grassland management, riparian and lakeshore restoration, etc. - Approximate need is \$25 million

Transportation Infrastructure – includes roads, bridges, and related structures (such as guard rails, curbs, etc.) - Approximate need is \$82 million

Water and Sewer Infrastructure – includes water and sewer conveyance and treatment facilities such as pump stations, treatment plants, canal structures, pipelines, and intakes - Approximate need is \$56 million

Administration/Visitor Support – includes facilities such as park visitor centers, offices, contact stations, and maintenance and service facilities - Approximate need is \$77 million

Dams/Impoundments – includes dams and related structures and components, as well as lake dredging - Approximate need is \$53 million

This investment and increased budget in preservation for state lands and DCNR is even more critical in a state park system where our state lands are being allowed to be carved up by the shale gas industry – leaving once beautiful wild places impacted by this industry (short and long term) that is causing climate change impacts from methane releases - in addition to directly causing deforestation, water contamination and freshwater use, compaction of soils, air, light and noise pollution, introduction of invasive species, spill threats and other threats that DCNR now has to contend with on it's already strapped budget. According to a 2015 report by PennFuture, over a third of Pennsylvania's roughly 2 million acres of State Forest land is already available for oil and gas development, either because it has been leased by the Department of Conservation and Natural Resources or because oil and gas rights are now owned by the Commonwealth.<sup>4</sup> Pennsylvania is known for its outdoor spaces and forests and a thriving recreation economy depends on these preserved places – to stay wild. Recreation studies by sister agencies to DCNR have already documented forest lands and natural places where oil and gas extraction occurs becoming less popular and no longer a destination or safe refuge for visitors who do not want to be exposed to the threats and harms of this industry willingly during recreation. A US Forest Service and USDA 2018 study found on average, each additional oil or gas well within a five-kilometer radius is related to a decline in six visits to the (camp) site, on an annual basis. The study goes onto note, “When Forest Service specialists are analyzing the potential social and economic impacts of oil and gas development close to recreation sites, as part of the National Environmental Policy Act impact analysis process, this research suggests that they should carefully consider not only impacts to recreation settings and the visitor experience, but also the real potential for declines in visitation and the associated drop in recreation fees available to local district managers for recreation resource maintenance and stewardship.”<sup>5</sup> Fracking and healthy recreation do not mix. DRN has received anecdotal information from our active members who have visited state parks and forest lands where fracking occurs and the response has not been positive. DCNR has its 2018 Shale Gas Monitoring Report<sup>6</sup> that documents some of the trends of recreational use and other impacts of shale gas in “gas

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<sup>4</sup> Fossil Fuel Subsidy Report for Pennsylvania, PennFuture, 2015.

[https://www.pennfuture.org/Files/News/FossilFuelSubsidyReport\\_PennFuture.pdf](https://www.pennfuture.org/Files/News/FossilFuelSubsidyReport_PennFuture.pdf)

<sup>5</sup> Rasch, Rebecca; Reeves, Matt; Sorenson, Colin. 2018. Does oil and gas development impact recreation visits to public lands? A cross-sectional analysis of overnight recreation site use at 27 national forests with oil and gas development. Journal of Outdoor Recreation and Tourism. 24: 45-51.

<sup>6</sup> Shale Gas Monitoring Report. DCNR, July, 2018.

districts” but the report states these trends are early on in the footprint of the emerging industry – the report also notes the slow in gas drilling after 2014 due to market prices (the boom and bust of fossil fuels).

Meanwhile parts of Pennsylvania, in the Delaware River Watershed – remain frack free with a de-facto moratorium in place since 2011 which tens of thousands are calling for a complete ban – and elected leaders including Governor Wolf call for not allowing fracking in the Delaware Watershed. Bans and moratoria around the nation and world are growing. DRN would urge, based on the vast science now available on fracking to health and the environment compounded with the climate change threats shale gas extraction causes - a full and complete ban on fracking is paramount and the only sustainable choice for the sustainability of Pennsylvania as a whole – this vision needs implementation now based on the climate science and in the near-term to avoid a climate change tipping point<sup>7</sup>. Equity of Pennsylvania residents must also be considered. Continuing to have elected officials sacrifice some areas of the state to drillers while supporting moratoriums in other areas based on the volumes of science showing harm is not precautionary, logical, or in keeping with Pennsylvania’s Environmental Rights Amendment under Article I, Section 27 of the Pennsylvania Constitution, which states that Pennsylvania residents have "a right to clean air, pure water, and to the preservation of the natural, scenic, historic and esthetic values of the environment." A Commonwealth with a complete moratorium or ban is the sustainable and healthy choice for our wild natural lands and the people who live and recreate here. We support DCNR scientists advancing data and studies available to fulfill this vision of phasing out this extraction rapidly. As this report looks to plan the next 25 years of our Pennsylvania parks it must also consider the identified and threatening build out footprint this fossil fuel industry could have on the state public trust and forests if fully developed. Some reports and compendiums to highlight for DCNR’s consideration: A 2016 CNA expert report commissioned by Delaware Riverkeeper Network projected the Marcellus shale build out for the state of Pennsylvania and provided insights into what full build out of shale gas drilling could look like for a variety of environmental issues. For example, CNA found the construction of natural gas infrastructure (well pads, gathering pipelines, and access roads) to support projected well development would result in almost 100,000 acres of land disturbance. Over half (about 51,000 acres) of the land disturbance would impact agricultural land, while about 28,000 acres would constitute the clearing of forest cover. Of the 28,000 acres of forest that would be cleared, CNA found that nearly 13,000 acres were core forest (patches of forest at least 300 feet from a forest edge). An additional 89,000 acres of core forest would be fragmented by the projected gas infrastructure development, resulting in a conversion to edge forest.<sup>8</sup>

As of April 16, 2019, according to the latest Compendium by Physicians for Social Responsibility and Concerned Health Professionals of New York (6<sup>th</sup> edition), there were 1,778 published peer-reviewed studies that pertain to shale and tight gas development archived in the ROGER database. This body of evidence reveals both potential and actual harms. Specifically, PSE’s statistical analysis of the scientific literature available from 2009 to 2015 demonstrates that:

- 69 percent of original research studies on water quality found potential for, or actual evidence of, fracking-associated water contamination,
- 87 percent of original research studies on air quality found significant air pollutant emissions, and
- 84 percent of original research studies on human health risks found signs of harm or indication of potential harm.

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<sup>7</sup> Climate Change Tipping Point Coming Sooner Than We Think. Julia K. Green, Sonia I. Seneviratne, Alexis M. Berg, Kirsten L. Findell, Stefan Hagemann, David M. Lawrence & Pierre Gentine. **Large influence of soil moisture on long-term terrestrial carbon uptake.** *Nature*, 2019 DOI: [10.1038/s41586-018-0848-x](https://doi.org/10.1038/s41586-018-0848-x) Science Daily: <https://www.sciencedaily.com/releases/2019/01/190123131700.htm>. January, 2019

<sup>8</sup> Lars Hanson, Steven Habicht, PhD, and Paul Faeth. Potential Environmental Impacts of Full-development of the Marcellus Shale in Pennsylvania. Document Number: IRM-2016-U-013695. September, 2016. [https://www.delawariverkeeper.org/sites/default/files/MarcellusPA\\_FullReport.pdf](https://www.delawariverkeeper.org/sites/default/files/MarcellusPA_FullReport.pdf)

A follow-up analysis using the same criteria for inclusion found that 90.3 percent of all original research studies published from 2016-2018 on the health impacts of fracking found a positive association with harm or potential harm.<sup>9</sup>

DCNR's website notes that natural gas development, especially at the scale seen in the modern shale-gas era, affects a variety of forest resources and values including: Recreational opportunities, the forest's wild character and scenic beauty, and plant and wildlife habitat. Overall, approximately 1.5 million acres of state forest are underlain by Marcellus shale. Of that acreage, 44 percent (673,000 acres) is available for gas development, either through DCNR-issued leases (386,000 acres) or severed lands development (287,000). Modern shale-gas leases restrict surface disturbance in sensitive areas and limit overall surface disturbance to approximately 2 percent of the acreage within the lease tract. It is important to note that we have a history of coal mining and long wall mining in the state that has fully extracted many of the less sensitive locations – and efforts continue to be underway to mine and remove coal in the more sensitive areas that originally were ruled as off limits. As Pennsylvania's history clearly shows, the gate once open to the fossil fuel industry is difficult to shut in an extraction state, especially with a state legislature that placates to this heavily subsidized industry. Therefore, while we work to ban this practice using the science and political will of the Commonwealth, DRN supports all efforts of DCNR to use its capabilities and legal expertise to keep the industry out of public lands to the best of its abilities.

Below are specific recommendations and comments emphasized for the preliminary Parks for All report that we hope DCNR will consider as it looks to plan the next 25 years of preservation and expansion of protected state park and forest lands. Delaware Riverkeeper Network comments are in *italics* – and reference listed Report points below for ease of reading and report revisions. Thank you again for the opportunity to help provide and envision the future of our state public lands through this living Report.

### **Improving Outdoor Recreation Opportunities**

**Survey Findings** - There is strong public concurrence for a continued emphasis on healthful outdoor recreation activities with the expectation of quiet, natural, or wild experiences, with support for protective measures when park resource impacts are evident. Additionally, there was agreement that state parks should offer more active adventure experiences.

### **Draft Recommendations - Expand Outdoor Recreation Opportunities:**

- Enhance landscape-level partnerships to increase connections between publicly accessible lands, with the goals of gaining outdoor recreational efficiencies and minimizing duplication of outdoor recreational services.
- Improve each park's trail system to ensure trails are sustainable and accessible for those seeking healthy, quiet, and natural experiences, with a goal to develop in every park one trail loop that is accessible to all people.
- Enhance water-based recreational offerings by developing innovative water facilities and activities, consistent with each park's natural aesthetic and character. An example would be developing a water/splash play area with the look of boulders and rock ledges where natural water recreation amenities are not available.
- Improve accessibility for water-based recreation by developing canoe and kayak launch sites for people with all abilities on all major recreational lakes within state parks.

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<sup>9</sup> Concerned Health Professionals of New York, & Physicians for Social Responsibility. (2019, June). Compendium of scientific, medical, and media findings demonstrating risks and harms of fracking (unconventional gas and oil extraction) (6th ed.). <http://concernedhealthny.org/compendium>.

**DRN Comment:** *Healthy, quiet and natural experiences along trails is not possible near shale gas industry footprints even beyond the initial frack stage. DRN and its members have hiked in various state forests where infrastructure is present and background noise, fumes, and the sight of all the infrastructure takes away from the experience hikers are seeking out. At the same time, allowing more fragmentation of forests and carving up of core forests to keep fracking more “out of site” by users is also clearly not the answer especially for the forest and the creatures that live there year-round and for protection of core forests and interior habitats.*

*Non-motorized and simple put in and take outs are an excellent way to provide less structured launches and encourage the growth of canoe, kayak, and paddle boarding – activities that are on the rise.*

*Landscape level partnerships are a great idea. In regard to minimizing duplication of outdoor recreational services, it is not clear of all the things being considered but DRN would suggest limiting the amount of motorized recreation in the form of ATVs on forested and natural public lands. We understand there are some pop up ATV parks located on impacted and abandoned reclaimed mine areas for example that could be a better spot for this noisy polluting activity that hinders enjoyment for others seeking non-motorized natural time.*

*Along these lines linking up and providing info for nearby private RV parks often located along boundaries of public lands is likely a better way to avoid creating unnecessary infrastructure on DCNR campgrounds where a large population of users are likely campers with tents. These partnerships can help ensure DCNR can spend its limited resources truly on healthy outdoor recreation activities that are often passive and that limit human footprints and harm.*

*DRN has witnessed successful and very popular splash parks in the city of Philadelphia – many funded in part by DCNR, that are a fundamental cooling off place for families in the summer. In cities these artificial cooling areas, especially with intense urban island heat events and climate change, are linked to health directly for large populations. In addition, efforts are underway in the surrounding Philly area to envision a safe swimmable Delaware River and tributaries. And to recognize that recreation and swimming already clearly are a use as families already boat, swim and recreate in the tributaries in and around Philadelphia including the main stem Delaware River, Cobbs Creek, Darby Creek, Pennypack, and others. Efforts should continue to ensure these tributaries are restored to their current existing and designated uses with investment in needed pollution controls to restore natural ecosystem health so these recreation connections to these natural waters can safely occur. Building artificial pools and systems not linked to the natural environment should be kept to a minimum of DCNR investment and time (especially with strapped budgets) while working to restore ailing natural waterbodies should have a higher priority to truly connect people to the natural world when possible - so they can recreate in the streams and river that flow through their communities safely. A recreation survey is underway by Delaware Riverkeeper Network and other allies specifically about recreational uses of the Delaware River and tributaries around the Philadelphia area; we would be happy to share results and next steps with DCNR when completed. We are still accepting responses to the recreation survey - here is the link to the survey: <http://bit.ly/DRNrecreation>.*

- Partner with the health industry in marketing state park outdoor recreational activities as a means of reducing obesity and stress and developing and maintaining a healthy lifestyle.

**DRN Comment:** *This is a perfect fit to link up environmental preservation programs with health related programs to capitalize on preventive health measures that will cut government health care costs and reduce hospital stays. Perhaps linking the two can assist in obtaining more funds to ensure everyone is close to natural places and spaces with addition of preserved forested and natural lands. A recent article published by Yale School for Forestry & Environmental Studies cited a 2019 study of 20,000 people, that found that people who spent two hours a week in green spaces — local parks or other natural environments, either all*

*at once or spaced over several visits — were substantially more likely to report good health and psychological well-being than those who don't. Two hours was a hard boundary: The study showed there were no benefits for people who didn't meet that threshold...the article goes on to cite that in 2005 when "No Child Left Behind" was written there were few studies showing this but today there are almost 1,000 studies that point conclude: Nature is not only nice to have, but it's a have-to-have for physical health and cognitive functioning." <sup>i</sup> DCNR capitalizing on this growing science and sharing it with elected officials concerned about childhood obesity and public health will help lead legislators to value these much needed and important environmental departments, forests and forest programs. Right now it seems the dots are not connecting.*

### **Protect Resources from Recreation Impacts:**

- Establish site-specific prescriptions to manage high-density outdoor recreation at parks where resources, visitor experiences, or communities are being impacted and develop viable solutions to address issues through stakeholder and community engagement.

***DRN comment:** It is important to ensure natural places and resources are protected. If over use or carrying capacity has been reached, pulsing visits or closing certain access points at a certain visitor number is a viable option and in many instances visitors can be re-routed to another nearby place to explore. Increasing park ranger presence at these areas will also help ensure safety and enjoyment.*

### **Offer More Active Adventure Activities:**

- Partner with the outdoor recreation industry to build and promote active adventure activities that are consistent with the state parks mission through joint programming that provides educational opportunities for novice and experienced adventure seekers.

***DRN comment:** What is meant by "active outdoor adventure" activities? Based on DCNR goals and mission, DRN does not believe that ATV use and expansion of motorized equipment use in our natural lands is aligned with nature enjoyment of wild places, especially in light of the maintenance issues these uses will cause in way of compaction, soil erosion and sedimentation in streams as well as noise and air pollution. Connecting people with private lands that offer these types of motorized ATV options is the best choice. By limiting ATV use we are ensuring our limited tax payer dollars goes toward healthy activities that rely on natural areas and forests and the quiet connection that is a goal of DCNR. ATV use does not rely on these unique natural conditions that DCNR is preserving and creating. Why not allow ATV use on already disturbed and denuded sites such as "reclaimed" coal mine fields that are abundant in the landscape through private partnerships? Rock climbing has become a popular past time and expanding options for climbers in limited areas to safely climb may be a good active adventure type to expand on.*

### **Enhance the full spectrum of overnight opportunities in state parks by 2030, including:**

- Renovate campgrounds to enhance their natural character while providing additional privacy, accessibility, sustainability, and safety.
- Increase pet-friendly campsites to 50% of all campsites (presently 37%).
- Increase large, multi-family campsites to 50 sites statewide (presently 5 sites).
- Add 100 more rental cabins.
- Increase full-service campsites to 20% of all campsites (presently 5%).
- Increase electric-only campsites to 50% of all campsites (presently 47%).
- Increase remote, non-electric, walk-in sites.
- Explore opportunities for "boat-in" waterfront camping.

- Examine trends for new types of overnight facilities and institute pilot projects, such as building elevated camping cottages to simulate a treehouse effect.

***DRN Comment:*** *It's important as camp facilities increase, that sensitive habitats and forests and clustering of cabins or campsites - esp if RV campsites - occurs to ensure protection of existing forests and to reduce problems like invasive plant colonization and forest fragmentation. Since cabins and RVs often lead to indoor time at a "campsite", clustering of these "electric" or cabin sites (more tightly together) is more logical than clustering closer tent-only sites where campers are more connected in tents or hammocks to the surrounding environment and sleeping, eating and enjoying time outside. A 3% increase in electric only sites seems within reason and perhaps will also assist with tent sites where campers may need access to cell phones and ipads or where they may be doing remote work by laptop at a picnic bench while camping. DRN staff have often used campsites in this way to conduct work while enjoying the forest.*

*Increasing remote non electric walk in tent sites is a great way to better connect people to the environment rather than expanding many RV sites that take up more room and limit enjoyment for campers who are tenting. RV sections remaining clustered and away from tent loops as much as possible and enforcement of quiet hours and use of generators and artificial lights should be limited.*

*With camping in general, it may be best to incorporate where needed, bear proof containers and signage on picnic tables that is clear about being "bear aware". With increased numbers of bears in Pennsylvania as the population recovers this camp outreach and education is critical and very much needed to ensure proper bear etiquette and bear safety by human visitors. As populations of campers diversify, its important to provide bilingual signage. Bear proof metal containers available to share at multiple campsites (as often seen in NPS facilities) could likely increase compliance and better bear aware camp etiquette. Increased park ranger presence and education as well as better training of concession staff would also be very helpful to ensure all staff reinforce bear aware practices consistently.*

*It is good to see DCNR looking to better preserve and enhance natural areas. DRN is very much in support of all efforts to better protect the integrity and diversity of the wild places of our forests. Efforts should be made to plant native plants between campsites for privacy and also for education to ensure invasive plants do not have room to colonize or spread. Having boot cleaning stations and more info on how trail users can avoid spreading invasive plant seeds would also be beneficial. Perhaps volunteers could assist with these kind of plantings and education strategies. DCNR's guide on planting edible buffers is another concept that would be educational around campsites – creating wild U-pick orchards around campsites and areas where people congregate overnight.*

*Limiting artificial light to better enjoy the night sky is a critical consideration for camp restrooms and bath houses and lights in general as well as for campers who may use large lights at their sites which spreads to neighboring sites. Please ensure there are no electric bug zappers used in the parks or bath houses as they are not effective at killing mosquitoes, nor in line with conservation of important pollinators since they often attract and kill beneficial insects. Outreach on pollinators, spiders etc. would be a good addition around bath houses and campsites to help instill their value at a time when people may be around these animals (there is a lot of outreach on spotted lanternfly or emerald ash borers for example but rarely is there as much literature on the importance of other insects that are beneficial). Along the same lines, artificial fragrances, air fresheners and deodorizers with artificial fragrance should not be used in camp facilities – they are not healthy for park users and also not necessary. Cleaning products of bath houses should also be sustainable and healthy options for the staff who have to use them as well as for park users.*

*Boat in waterfront camp sites or paddle in sites, especially for canoes and kayaks and non-motor craft, are a great way to increase water recreation and camping at the same time and increase often more remote locations for campers who want to avoid the hustle and bustle of a busy camp loop that might also have RVs peppered in it or among it.*



*Increasing pet friendly camping seems an important need as people travel with their animals and many families now are opting to be kid-free. We know many NJ residents and members who come camp in PA as PA has more tolerant dog policy than the state of NJ, for example.*

*Increasing large multi-family camping sites to 50 (currently only 5) seems reasonable if care is done to cluster these sites. Another option would be to indicate on camp maps individual sites that are capable of being reserved in multiple numbers for a larger crowd; however often bigger family units are much louder so these larger group sites may be less disruptive if isolated from individual tent sites. Encouraging large multi-families to recreate in our forest is very important.*

*DRN strongly agrees that resort-style developments that house over 1,000 people is not compatible with nature and the mission of DCNR lands. We also believe that hosting events that would draw over a thousand people is also not in line with the DCNR mission.*

## **Protecting the Parks' Natural & Cultural Resources**

### **Survey Findings**

There was strong public concurrence for improving state park aquatic resources and terrestrial native habitats, and expanding park lands in the commonwealth for the benefit of all Pennsylvanians, and high agreement that the Bureau should provide more support for volunteer efforts that assist park operations.

### **Draft Recommendations - Strengthen Resource Protection:**

- Increase professional staff levels by 15 percent to meet the Bureau of State Parks' legislative mandate and constitutional trustee responsibilities.
- Develop a night sky management program to conserve the night sky in state parks and enhance night sky viewing across the commonwealth.
- Determine threats within state park watersheds that have the potential to impact park resources and work collaboratively with public and private partners to mitigate impacts.
- Identify and fund prioritized cultural resources for restoration and engage cultural resource partners and the PA Historical and Museum Commission in completing historical restorations and utilizing historical structures for alternative uses.
- Establish Bureau-level data management and mapping services using GIS to support the Bureau's operations, recreational planning, and resource management needs.
- Expand research and collection of scientific data to establish site-specific prescriptions that will conserve critical habitat and protect species of special concern.
- Expand native habitat by converting remnant agricultural lands into pollinator meadows, native grasslands, and forests.
- Expand construction of ponds, wetlands, rain gardens, bioswales, and other landscape to capture and treat stormwater running off parking lots, roads, and buildings located within park boundaries.

***DRN Comment:*** *Please see DRN comments above related to Marcellus shale exploitation as well as native plantings, light pollution, pollinator habitat, and importance of a strong volunteer corps. Investment in conserving our natural places and strengthening resource protection through the outlined bullets above DRN strongly supports. DRN will be happy to assist DCNR to help stop or lessen impacts. DRN would encourage as part of this effort that sister agencies like DEP help facilitate or welcome DCNR's efforts to upgrade streams that run thru state parks and forest lands. With DCNR having clear plans of conservation it would be important to aquatic resources and wetlands that EV protections are secured through DCNR lands. Currently there is a mechanism for Fish and Boat Commission streams to receive HQ designation*

*based on trout surveys – why not expand and ensure a similar EV designation for our public lands and the streams that run through them?*

*DRN would also suggest expanding the conservation areas and state park natural areas to be more comprehensive when evaluated for stream upgrades by DEP. According to the report, A **Conservation Area** is a designation for an entire state park whose lands have been donated to the commonwealth and have been dedicated for the primary purpose of natural resource conservation and open space preservation. One is in Wayne County: Varden Conservation Area; and two are in Dauphin County: Joseph E. Ibberson Conservation Area and Boyd Big Tree Preserve Conservation Area. In the 1990s, the **State Park Natural Areas** program was created to identify and conserve examples of special plant and animal communities, and areas of natural interest and beauty. Nearly 12,000 acres were officially designated as Natural Areas within 16 state parks to ensure their protection for future generations. DRN believes this designation should be expanded.*

*Converting intensive ag lands or remnant ag lands to pollinator meadows, native grasslands and forests is a much needed and important initiative that is in line with DCNR's goals and mission. Phasing out or buying up intensive ag leases (growing of corn and soy and alfalfa etc.) or encouraging farmers to consider pollinator plots, grassland bird plots, small non-spray native orchards for picking gardens and perhaps even community organic garden plots where it would make sense are other options.*

### **Improve Park Boundary Planning:**

- Dedicate a minimum of 2 percent of the Bureau's operating budget annually for land acquisitions to eliminate inholdings, enhance boundary management, and protect and conserve outstanding natural, cultural, and outdoor recreational resources in the commonwealth.
- Establish a sustainable boundary goal for each state park that will meet operational needs and support identified outdoor recreational activities, resource conservation, and park programs.

***DRN Comment:** Funding for these important additions and acquisitions of additional lands and the designation of established additional "wild criteria" or DCNR adding additional areas designated as "outstanding natural, cultural and outdoor recreational resources" is important. As indicated above, DRN supports agency efforts to broaden the use of Exceptional Value (EV) criteria for PA streams and wetlands under criterion under Chapter 93 that we believe DCNR has the ability to push for strongly - perhaps as a larger statewide initiative to call the DEP to designate EV streams through all DCNR lands. The water quality criterion most DCNR lands likely fall under is in quotes here but we do not believe that during the upgrade process sister agencies automatically recognize these components: "Outstanding National, State, regional or local resource water—A surface water for which a National or State government agency has adopted water quality protective measures in a resource management plan, or regional or local governments have adopted coordinated water quality protective measures along a watershed corridor." An effort to have a statewide upgrade to ensure all streams in DCNR lands have EV status we believe would be in line with the conservation measures DCNR seeks to expand and support.*

*Establishing natural migration corridors and waterway corridors to connect wild lands is also important for animals that live and move around in natural places. When trails along waterways are considered we believe more needs to be done to ensure forested buffers, meadows and natural habitats are part of the trail design. The science shows that a 300-foot minimum buffer on each side of the stream is ideal for migration patterns and water quality health. Too often trails seem to become manicured or include lawn over meadows or trees and we believe that both reduces the enjoyment for the multi-use trail users and also reduces the natural function of those trails to serve other ecological purposes. DCNR may also be able to work with other highway agencies (PENNDOT) to call for consideration of migration corridors above or below highways that often bisect our natural lands and are a danger to migrating animals as well as highway drivers. They could be a requirement of any expansions or additions.*

## Enhance Resource Mitigation:

- Identify, fund, and implement park-based projects that will mitigate the effects of climate change and that address habitat resiliency, riparian buffers, and lake and stream restoration.
- Seek scientifically based compensation when private entities gain legal right-of-way access across state park lands when all alternatives to avoid park lands have been exhausted. This will serve to mitigate the resulting losses of ecological function and outdoor recreational use.

**DRN Comment:** DRN is sharing the recent court decision pertaining to PennEast pipeline ROWs being located across public lands in the state of New Jersey. A U.S. appeals court in September 2019 barred PennEast Pipeline Co from using a federal law to seize properties controlled by the state of New Jersey in order to build a proposed \$1 billion natural gas pipeline from Pennsylvania to New Jersey. **The U.S. Court of Appeals for the Third Circuit said in its decision that the U.S. Natural Gas Act does not allow companies to condemn state controlled land in federal court because states enjoy sovereign immunity from such actions under the Eleventh Amendment of the U.S. Constitution.**<sup>10</sup> There may be application to help protect Pennsylvania's natural lands especially in light of the shale industry and its projected build out in the state that DCNR could employ to best protect our public lands (see comments on shale gas above).

DRN believes it is critical that DCNR use ecosystem services reports and other science to better protect DCNR lands to illustrate and account for all the external resources that are lost when often the equation is weighted just to list short term economic gains. These types of services have been used for compensation under NRDA since the Exxon Valdez oil spill and there are other novel methods being used to attempt to lessen harms when private industry attempts to take public lands for their use. DRN has commissioned these economic pipeline analyses for several proposed gas pipeline projects to truly show all the harms and losses to the public trust that have been sacrificed for private gain. Here are links to a few of the ecosystem services reports if they can be of help. The first is a report by KeyLog Economics about the Ecosystem Services Cost of the proposed PennEast gas pipeline:

[https://www.delawariverkeeper.org/sites/default/files/EconomicCostsOfThePennEast\\_TechnicalReport\\_FINAL.pdf](https://www.delawariverkeeper.org/sites/default/files/EconomicCostsOfThePennEast_TechnicalReport_FINAL.pdf) and the second is a 2010 expert report by Dr. Barth pertaining to the Economic Impact of Gas Drilling <https://www.delawariverkeeper.org/sites/default/files/resources/Reports/Barth%20paper.pdf>. We can share other similar reports as well if helpful.

## Improve Volunteer Program:

- Work through major state park volunteer organizations to enhance relationships with volunteers. An example of an enhancement would be to develop an annual conservation volunteer summit to help retain and recruit volunteers, share new opportunities, and increase esprit de corps.

**DRN Comment:** DRN believes strongly in recruiting and working with volunteers – it is a core component to much of our river work and collective protection efforts to rely on volunteers. We are glad to see DCNR embrace volunteers as well but we also recognize that paid dedicated knowledgeable staffing is critical and contracts with private entities should not take away from funding knowledgeable DCNR rangers, foresters and environmental professionals who are full time and beholden to the public trust. **We need to fully fund and support our natural lands and demand our elected officials support funding increases for DCNR lands.** Twenty-five years ago, the State Parks 2000 report showed that \$100 million was needed to properly address a growing list of maintenance and replacement projects related to state parks infrastructure. Today, that need has grown to more than \$500 million due to the appropriated budget for state parks not keeping up with inflation, and due to a reduction in staff, requiring higher costs for contracted labor. The condition

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<sup>10</sup> Reuters. U.S. court says PennEast cannot condemn NJ state lands for pipeline. Sept 10, 2019.

<https://www.reuters.com/article/usa-penneast-natgas-new-jersey/u-s-court-says-penneast-cannot-condemn-nj-state-lands-for-pipeline-idUSL2N2610MY>

*of state park facilities is deteriorating, with some facilities being shuttered, and some recreation activities no longer available—while demand for park use is higher than ever before. Hiring contract staff versus fully funding public DCNR employees that are full time and experienced does not seem to make sense both by the costs long term and for the often lack of commitment that may be provided by part time staff who are not fully embracing the goals and mission of the DCNR. Having park rangers interface with the public who are knowledgeable about natural ecosystems is key – again this is often our chance to educate the public on natural systems so we should invest in these positions.*

*During the Great Depression (starting in the 1930s), the Civilian Conservation Corps (CCC) and the Works Project Administration (WPA) put tens of thousands of young men to work in Pennsylvania planting trees and building roads, dams, cabins, pavilions, and stone walls. Americorps and VISTA and other programs today may have some similar roles but we would benefit greatly if elected officials valued the preservation and maintenance of our natural lands to support a CCC Green Program for this generation to combat climate, put people to work, and restore habitats and forests using non-structural restoration and methods.*

## **Paying for State Parks**

### **Survey Findings**

There is strong public concurrence that the commonwealth should increase funding to maintain, repair, and improve park facilities, and that increased funding occur without creating new fees or increasing existing costs to park visitors. In addition, there is mild support among 2017 survey respondents for converting low-usage parks to being more rustic with minimal facilities.

### **Draft Recommendations - Reduce Costs and Improve Efficiencies within State Parks:**

- Assess all current park buildings to determine their condition; and provide funding to renovate those buildings deemed mission critical while accelerating demotion of buildings that are costly to maintain and do not have historical significance.
- Reduce energy consumption by 25 percent with the goal of deriving 50 percent of electric needs through renewable energy sources, working toward a goal of net-zero energy consumption of the built infrastructure in all parks.
- Establish annual park-based maintenance plans to maximize staff efficiencies and use of resources to repair and restore park resources, facilities, and infrastructure.
- Identify leaks in water distribution systems, then develop a prioritized list of critical water infrastructure projects and funding needed to renovate and construct water treatment infrastructure, thus conserving water and reducing annual operating costs.

**DRN Comment:** *A net zero energy consumption goal is a good one and efforts of the park to work towards helping solve the climate crisis is critical. We understand a DCNR Climate Change Adaptation and Mitigation Plan from 2018 will be incorporated in this final document and we believe that is important though we have not reviewed that document as part of this review*

[http://www.docs.dcnr.pa.gov/cs/groups/public/documents/document/dcnr\\_20033655.pdf](http://www.docs.dcnr.pa.gov/cs/groups/public/documents/document/dcnr_20033655.pdf). *Along those lines having more rustic sites and non-electric sites would be in line with energy conservation as well to encourage park users to conserve.*

*Removal of some existing dams is another conservation initiative to help restore natural flows and fish migration and to alleviate the need for dam repairs and the large costs that go along with dam maintenance and inspections in the long term. DCNR has already begun removing some dams which is a great step. According to the report there are 90 dams that DCNR maintains and there is a need for \$53 million for dam maintenance as well as lake dredging. State regulations require that all state park dams receive regular inspections and maintenance to ensure their integrity. If any should fail, they would pose a hazard of*

*varying degree to property and people living downstream. All dams in the commonwealth are given a classification according to a varying potential for loss of property or loss of life, were they to fail, not due to their condition. Pennsylvania's state park dams each fall into one of three categories: High Hazard, Significant Hazard, or Low Hazard. There are 41 dams classified as "High Hazard," meaning that there is potential for loss of life or loss of infrastructure downstream if the dam were to fail. Populated areas are located downstream of a High Hazard dam. The dam that creates the 45-acre Lyman Run Lake was reconstructed in 2009 at a cost of \$18 million. Some of these larger dams could also be considered for removal.*

*State park infrastructure requiring regular maintenance includes: 90 dams, 490 miles of roads, 332 vehicle bridges, 770 pedestrian bridges, 4,188 buildings, 128 drinking water treatment facilities, 59 wastewater treatment systems, and 15 swimming pools. Again, as stated above the legislature and the state budget should adequately fund our natural parks and the DCNR program and we need to demand our elected officials work towards this goal to help restore and invest in the back log of needs, especially conservation needs for habitat, that have been suffering since increases have not occurred in the budget. We need to ensure that fees collected in state parks are used to restore state parks and lands and not siphoned off for other budget items that may not have anything to do with public lands. We need to ensure that conservation funding (e.g., the Keystone Fund and the Environmental Stewardship Fund) is used for stewardship purposes to repair and improve park resources. Providing a sustained and a commensurate increase in annual state appropriations certainly is warranted for the enjoyment and activities DCNR provides to residents in the state.*

## **Improving Services & Facilities**

### **Survey Findings**

There is high public satisfaction with the quality of services and facilities currently being offered at state parks. Constraints to using state parks appear to be few, but more work could be done to improve transportation opportunities to parks from urban areas.

### **Draft Recommendations - Expand use, access, and inclusion:**

- Develop a marketing campaign that will attract diverse, new, and inexperienced outdoor recreational users to the state parks.
- Improve transportation options to broaden park access, particularly in urban areas, by partnering with public transportation agencies to improve utilization of bus and rail lines.

### **Improve Program Offerings and In-park Experiences:**

- Expand educational programming for all audiences on how to enjoy the state parks sustainably during their stay, with emphasis on understanding conservation of park resources and ecologically sensitive behavior.
- Work with the educational community to expand integration of environmental education into the classroom, particularly in urban areas and in middle and high schools, resulting in new generations of supporters of the state park system.
- Expand the use of social and electronic media, including development of smart mobile device applications, that enhance the state park experience for all Pennsylvanians.
- Expand the Bureau's public safety and outdoor recreational programming to increase visitor awareness of the inherent risks in visiting natural places and building skills and confidence, to better prepare for outdoor experiences.
- Evaluate the more than 125 state park concession operations and implement improvements that will better serve the public. An example would be replacing a small food stand run by one concessionaire

with a parking area designed for several food trucks, with the goal of enhancing flexibility and variety of refreshments for visitors.

**DRN Comment:** *Outdoor sustainable education and increasing diverse populations connected to nature is a critical component that deserves time both in way of helping educate a healthier population to get outside to enjoy the health benefits while also teaching important outdoor skills that many people have become disconnected from. See the bear education comments above as well and components on camp facilities and cleaning products etc. These sustainable practices at camp areas and buildings (demo rain gardens, pollinator plots, less lawn and more habitat) can help educate folks for cleaner healthier homes and habitats where they live. Concessionaire evaluation seems important and the idea of food trucks that provide sustainable food choices would also go hand in hand with DCNR's education mission – vegan options, venison meals, local produce or free range meats & pasture raised eggs, and the like could help improve choices. Sustainable compostable packaging at all facilities and/or ability for folks to bring their own dishes and mugs would also be a good addition to require of all food trucks or private concessionaires. Emphasis away from any bottled water if possible is needed and DRN has noted refill bottling stations at several state parks which should be expanded.*

### **Increase Employee Diversity:**

- Increase support for youth programs, such as the PA Outdoor Corps, that serve as a stepping stone to exposing promising youth to careers in DCNR and the Bureau of State Parks.
- Develop programs to increase the diversity of state park staff to reflect the ethnicity of Pennsylvania citizens.

**DRN Comment:** *DRN embraces efforts by DCNR to expand PA Outdoor Corps to connect children to nature and to diversify its staff to reflect and celebrate the rich cultural diversity we have in the state. With many kids suffering from too much screen time – this connection to nature is vital.*

### **Reduce Greenhouse Gas Emissions:**

- Utilize green building design where appropriate in facility construction and expand alternative energy generation (such as adding photovoltaic panels to buildings), with a goal of 50 percent of electricity derived from renewable sources by 2030.
- Continue to add new electric-vehicle charging stations across the park system to support the statewide development of a public electric vehicle charging infrastructure network.

**DRN Comment:** *It is a welcome sight to see electric plug in vehicle stations at many state parks and according to the report by 2020 there will be charging stations in at least 35 state parks. It is also a critical step to achieve energy from renewable sources while also conserving energy through insulating and energy audits. Please see comments regarding Marcellus shale industry impacts and a call for moratorium on the expansion of this industry in public lands.*

*For part of the report that lists “Examples of Environmental Issues”, DRN suggests adding frack pad sites, water lines, transmission pipelines and gathering lines to the list of environmental issues to clearly outline the shale gas industry footprint fully in this Report.*

**DRN Comment:** *DRN does not see any information pertaining to harvesting trees in DCNR lands and state parks. We think this use and general info should be provided in the report since harvesting is a regular practice of DCNR and since logging has occurred recently in state parks or around state parks in DCNR forests related to emerald ash borer impacts and routine harvest. Information on DCNR foresters versus contractor companies could be explained more in this report as well to support funding full time DCNR foresters versus private contracting.*

Thank you for your time and consideration of our comments to help plan and envision the next quarter century of efforts to protect and expand Pennsylvania's natural lands and parks. If you would like to reach out with ways to work together on common protection goals do not hesitate to contact us at 215-369-1188 or at [faith@delawariverkeeper.org](mailto:faith@delawariverkeeper.org). We look forward to seeing the final Parks for All Report and using it as a guide and tool to help advocate for more preservation of the public lands of Pennsylvania.

Sincerely,



Maya K. van Rossum  
the Delaware Riverkeeper



Faith Zerbe  
Director of Monitoring

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<sup>i</sup> White, M.P., Alcock, I., Grellier, J. *et al.* Spending at least 120 minutes a week in nature is associated with good health and wellbeing. *Sci Rep* **9**, 7730 (2019) doi:10.1038/s41598-019-44097-3; Accessed here: <https://www.nature.com/articles/s41598-019-44097-3>