

2024

Annual Report

Review of Our Work Throughout the Year



ABOUT THE DELAWARE RIVERKEEPER NETWORK



The **Delaware Riverkeeper Network (DRN)** champions the rights of our communities to a Delaware River and tributary streams that are clean, healthy, free-flowing, and abundant with a diversity of life. DRN works throughout the four states of the Delaware River watershed, as well as the federal level, when issues that impact the health of the Delaware River watershed play out on a national stage.

FINANCIAL INFORMATION

- DRN is a Pennsylvania non-profit corporation.
- DRN's Entity Number, assigned by the Pennsylvania Department of State's Bureau of Corporations and Charitable Organizations, is 3813360.
- DRN's Employer Identification Number (EIN) is 74-3255972.
- DRN's registered and principal office address is:
925 Canal Street, Suite 3701
Bristol, PA 19007
- This address is in Bucks County.
- View our most recent financial information online at [ProPublica's Nonprofit Explorer](#) and read about our 4-star rating at [Charity Navigator](#).

OUR PROGRAMS

Advocacy - Defending our River and communities from harm now and fighting for regulations that will provide protection in the future

Litigation - Pursuing legal action on behalf of the River and its affected communities

Monitoring - Detecting pollution and helping diagnose the health of our living River

Restoration - Implementing on-the-ground actions that are driven by, and measured against, benefits to the health of the waters of the Delaware River Basin

Awareness - Sharing information, tools, and training to help people protect local streams

River Tech - Providing technical assistance to watershed organizations, conservation groups, municipalities, agencies, and others to develop and implement watershed plans and projects



A LETTER FROM THE DELAWARE RIVERKEEPER

Maya K. van Rossum,
the Delaware Riverkeeper

Photo credit: A. van Rossum



Once again, I have the privilege of presenting highlights about the work we accomplished last year. In 2025, it may feel like a luxury to take the time to look back at our efforts in 2024, but it's important to pause, take a breath, and review. The successes of 2025 and beyond will be built on the foundations of our efforts in 2024.

Last year, we helped protect threatened and endangered species; we continued to oppose proposals to develop liquefied natural gas export facilities in our watershed; we raised awareness of false climate solutions being put forward; and we responded to pollution incidents and called for greater transparency to protect the public's health. After a lengthy legal battle, we secured a precedent-setting decision regarding the proper forum for challenging pipeline permitting in Pennsylvania. We continued our opposition to the proposed Camp FIMFO development in New York, which has been described as the largest development project ever to come to the Upper Delaware. We supported individuals and grassroots groups across the watershed when their communities were threatened by bad development proposals. We also biked and paddled the watershed with our members, to help reconnect us all to the natural world.

In this annual report, you will find stories that lift up important outcomes for every single month of 2024. We also made the decision to dive deeper into a few of our issues with extended reporting. Even with this longer format, there is still much more that cannot be covered here.

I am so very proud of the work undertaken by the staff and volunteers of the Delaware Riverkeeper Network last year (*and every year!*). Their efforts, made possible by financial support provided by our members, give me hope for the future. I am inspired by the collective commitment to fight for our River, its watershed, and its communities, both human and wild.

The Delaware Riverkeeper Network is the only environmental advocacy organization working throughout the entire Delaware River watershed. The demand for our attention to, and leadership on, a wide array of environmental issues in our region is growing. It is so important that we are here for the River and the communities that rely upon it, not just at this moment, but for all the moments to follow.

I am honored that our members continue to find our mission worthy of support. We could not undertake the work we do without donations from our members. Please enjoy reading about our work in 2024 on the pages that follow to learn about the accomplishments that member dollars helped make possible.

Remember the River,

Maya K. van Rossum
the Delaware Riverkeeper

P.S. We could not undertake the work we do without support from individual donors. Read on to learn more about how to support the work of the Delaware Riverkeeper Network now and into the future.

Between December 2023 and February 2024, Delaware Riverkeeper Network and the New Jersey Fish and Wildlife biologists collected 15 Eastern tiger salamander egg masses from two vernal pools in southern New Jersey for translocation. The Eastern tiger salamander, *Ambystoma tigrinum tigrinum*, is listed as a State Endangered Species in New Jersey. According to climate change models, these pools are at risk of future saltwater intrusion, putting this local population at risk.

The egg masses were relocated to a state-owned 1,400-acre property located farther north and inland, to ensure a safer habitat for the salamanders. The new property was selected due to having suitable hydrology and surrounding habitat to accommodate the salamanders through all stages of life. Egg masses were placed in wire cages to protect them from predators, equipped with foam floats to allow them to rise and fall with changes in water level and attached to poles via looped zip ties. The 15 egg masses resulted in approximately 100 hatched Eastern tiger salamander larvae.



Adult Eastern tiger salamander
Photo credit: M. McCann

In January, the Delaware Riverkeeper Network provided live stream coverage of an informational meeting held to discuss the proposed US Army Corps of Engineers flood mitigation plan for the Eastwick neighborhood in Philadelphia, PA. Eastwick sits between the Delaware and Schuylkill River, it is also near where the Darby and Cobbs creek meet in Southwest Philadelphia. The low-lying neighborhood is prone to flooding, which will only be made worse with climate change.

In February, the Delaware Riverkeeper Network, along with our community activist partners, and some Pennsylvania state representatives, rejoiced when a moratorium was imposed by the US Department of Energy (DOE) on permitting for Liquefied Natural Gas (LNG) export projects on January 26, 2024. A press conference was organized to mark the moratorium with speakers from Chester Residents Concerned for Quality Living (CRCQL), Roots of Chester City, State Representatives Carol Kazeem and Joseph Hohenstein, and Delaware Riverkeeper Network. We also provided live coverage, streaming the event live on Facebook.

Update: In December 2024, the DOE published an LNG export study December 2024, which concluded the approval of more LNG exports will undermine critical climate goals, by increasing greenhouse gas emissions; bringing economic hardship and instability to consumers; and harming public health, especially in environmental justice communities.



Tracy Carluccio, DRN Deputy Director, speaking at the LNG moratorium press conference

Photo credit: A. van Rossum

Diving Deeper: MACH2



In late 2023, the Biden Administration announced that billions in funds from the federal 2021 Bipartisan Infrastructure Act had been earmarked for seven hydrogen hubs to be located across the country. Two of these hydrogen hubs would be located in Pennsylvania, ARCH2 (Appalachian Regional Hydrogen Hub) and MACH2 (Mid-Atlantic Hydrogen Hub), but the footprints for these hydrogen hubs are sprawling. MACH2, which would impact the Delaware River Watershed, would be comprised of approximately 20 sites across southeastern Pennsylvania, central and southern New Jersey, and the entire state of Delaware.

The Delaware Riverkeeper Network has long been advocating for truly clean and renewable energy. As a result, we had already begun to investigate energy proposals, including those using hydrogen, that are being falsely peddled as climate solutions. Such projects actually encourage the continued reliance on fossil fuels, rather than turning us away from them.

Renewables are the best investment to achieve the goal of minimum 50% greenhouse gas emissions reduction by 2035 and zero greenhouse gas energy systems economy-wide by 2050. It is a waste of renewable energy to use it to make hydrogen

The developers of MACH2 have not been forthcoming with the public on where sites will be located in our Watershed, what energy sources will be used for the hydrogen manufacture, how much hydrogen will be used, or what the public health and environmental impacts will be. Additionally, information surrounding the production of hydrogen has been misleading. For example, a MACH2 abstract stated the hub will primarily create “Green” hydrogen (made from renewable energy) and “Pink” hydrogen (made from nuclear power), but it is not clear whether fracked gas will also be used or whether energy from fossil fuels would be pulled from the electric grid to make hydrogen, which means using dirty energy sources.

In February 2024, the Delaware Riverkeeper Network held our first MACH2 webinar, titled “Powerfully Engaging MACH2 Communities,” which focused on community engagement and specifically lifted up the voices of environmental justice leaders from communities that would be directed impacted by MACH2. We followed this program with a [seven-webinar series](#) on hydrogen. Information sharing was an important part of these programs, with any general information

that we found on hydrogen being shared with the public as well as any details on MACH2 projects. Registration numbers for all our hydrogen/MACH2 webinars totaled over 1,400 with over 1,000 total combined views for these webinars on our YouTube channel.

On March 11, the developers of MACH2 held their first – and only – in-person public meeting at the Local 420 Union Hall in Philadelphia, which was over two hours away by public transportation from communities like Chester, which is proposed to be impacted by MACH2 facilities. To make clear the need for MACH2 developers to engage and involve the communities to be impacted, the Delaware Riverkeeper Network, along with community members and partner organizations, attended this meeting to protest.

Throughout 2024, the Delaware Riverkeeper Network initiated actions at MACH2’s in-person events (“meetups”). MACH2 requires that the general public pay to attend its meetups, which presents a barrier to participation that also keeps information about MACH2 projects behind closed doors and a paywall. We worked with our partners to organize flyering actions and protests at these meetups.



Delaware Riverkeeper Network staff with partner organizations protesting outside of a MACH2 business meeting in July

Photo credit: A. van Rossum

MARCH



APRIL

In March 2024, the Delaware Riverkeeper Network submitted a comment to New Jersey Department of Environmental Protection in support of a Visitor Use Map for Wharton State Forest. The proposed map would close off vehicle access to environmentally sensitive areas of the park to protect streams and wetlands from degradation and harm, while enhancing visitor safety.

Wharton State Park is situated in the heart of the Pinelands National Reserve. It supports a wide range of outdoor activities and is extremely popular. Unfortunately, there are many sand paths and poor road demarcation, which has resulted in confusion of which roads are, or are not, intended for vehicles.

Update: *Advocacy success! In November 2024, the New Jersey Department of Environmental Protection released a map clearly delineating legal roads for driving vehicles within the park.*

Also in March, the Delaware Riverkeeper Network assisted with the planning and execution of a meeting with the Pennsylvania Department of Environmental Protection to discuss Exceptional Value (EV) and High Quality Waters work that needs to be accomplished.

The Delaware Riverkeeper Network is a co-chair of the Pennsylvania Campaign for Clean Water's Exceptional Value Workgroup. This coalition speaks in one voice in support of federal and state policies to protect and restore Pennsylvania's water resources.

In April, the Delaware Riverkeeper Network received a tip through our pollution hotline about a yellow-green substance flowing into the Schuylkill River near Bartram's Gardens. We investigated the incident and produced a video to alert the public. Delaware Riverkeeper Network staff informed the Pennsylvania Department of Environmental Protection and watchdogged the agency's response, including submitting a Right-To-Know request regarding prior pollution incidents that may have occurred at the since 2000.

Update: *In July 2024, testing conducted by the property owner's consultant revealed that detectable levels of hexavalent chromium were present in both the soil and groundwater at the site. As chromium is a known human carcinogen, a popular walking trail just south of the source of the contamination was closed during testing. The Delaware Riverkeeper Network's [Riverwatch](#) was the first to report on this incident.*



Contaminated run-off flowing onto a public trail and into the Schuylkill River

Photo credit: A. Switzer

On April 4, the Delaware Riverkeeper Network, along with PowerCorps Camden students and city Public Works Department personnel, [planted 29 trees at Reverend Evers Park](#) in Camden, NJ. The trees will help reduce flooding downstream, sequester carbon, and provide shade and habitat in the park. This tree planting is a part of the larger master plan produced by Delaware Riverkeeper Network, with input from the local community and project partners, to address ecological issues, recreation and community garden facilities, and cultural and ecological needs.

Update: *PowerCorps Camden is a part of the larger AmeriCorps program. In April 2025, the Department of Government Efficiency made drastic cuts to AmeriCorps. The majority of the federal staff were placed on leave, with \$400 million in federal grants terminated immediately, including the grant to the Center for Family Services that supported their PowerCorps program.*

In May, the Delaware Riverkeeper Network completed a much-anticipated turtle garden for diamondback terrapins on the New Jersey bay shore. Overharvesting, vehicle traffic, and change in rising sea levels have resulted in these terrapins being listed as a species of concern for New Jersey. At the site chosen for this garden, terrapins are especially susceptible to being trapped in rubble dunes, along with potential interactions with vehicle traffic if they are forced to cross the road to find a nesting area. With the creation of this new nesting garden, diamondback terrapins will not have to cross the road in search of appropriate nesting areas.

Update: *Turtle garden monitors saw first-year nesting usage!*



Installation of Turtle Garden

Photo credit: E. McCann

On June 5, the Delaware River Basin Commission (DRBC) held a rare, in-person business meeting in Narrowsburg, NY. The Delaware Riverkeeper Network sent a call to action to our members to encourage public turnout and comment at the meeting. We were able to organize a press conference and rally that were held before the DRBC meeting. The Delaware Riverkeeper Network and members of the public called on the Commissioners to do more in the fight against climate change and destructive developments. During the meeting, the Commissioners unanimously agreed to create the agency's first-ever climate resilience program. The Delaware Riverkeeper Network applauded the sentiment, but argued that DRBC should use its permitting power to deny any future projects that would contribute to greenhouse gas emissions or worsen climate change impacts.



[Tracy Carluccio speaking in Narrowsburg](#)

Photo credit: P. Carluccio



Longtime Horseshoe Crab monitor

Photo credit: F. Zerbe

In May and June, the Delaware Riverkeeper Network worked with volunteers to tag 400 horseshoe crabs, *Limulus polyphemus*, on Thompson Beach, NJ. Information about the tagged horseshoe crabs is sent to the US Fish and Wildlife Service, which provides the tags. The tagging program provides valuable data on the location, movements, and mortality of horseshoe crabs, which are considered a keystone species because many other species, including migratory shorebirds, depend on horseshoe crabs for their survival.

In May, we organized and led two emergency response horseshoe crab rescues at Thompson Moores beaches that resulted in the rescue of 1,580 horseshoe crabs which had become stranded in high sand or backwater marshes due to climate change impacted high tides. Staff and volunteers safely transported the horseshoe crabs back to the beach as the tides

receded, getting them back into the waters of the bay. **In June**, during a routine walk with three volunteers at Thompson Beach, another 671 stranded crabs were rescued.

With the help of our volunteers, we led a total of eight spawning surveys on South Bowers Beach, DE, as a part of the annual Delaware Bay Horseshoe Crab Survey. During each of these surveys, overturned horseshoe crabs were flipped and stranded horseshoe crabs were rescued.

Diving Deeper: Transco REAE Pipeline

In 2021, the Transcontinental Gas Pipe Line Company, LLC (Transco) proposed the Regional Energy Access Expansion (REAE) project, an expansion to their pipeline facilities in Pennsylvania and New Jersey. This project consists of 22.3 miles of 30-inch diameter pipeline in Luzerne County, PA; 13.8 miles of 42-inch-diameter pipeline in Monroe County, PA; a gas-fired turbine driven compressor station in Gloucester County, NJ; and several other modifications to existing pipeline and compressor stations. This project is proposed to impact 114 Exceptional Value (EV) wetlands and cross 77 water bodies supporting cold water fisheries, including 39 High Quality (HQ) streams, 2 EV streams, 17 Class A Wild Trout Streams, and 57 water bodies with naturally reproducing trout. The project would allow Transco to transport an additional 829,400 dekatherms per day of natural gas to end users in the Mid-Atlantic.

The Delaware Riverkeeper Network first opposed the REAE in March 2021, when we intervened in the Federal Energy Regulatory Commission (FERC) docket for the project's Certificate of Public Convenience and Necessity, an authorization required by the federal Natural Gas Act (NGA) to build natural gas infrastructure that is a part of an interstate transportation system. We submitted extensive comments, along with our community partners, on FERC's draft Environmental Impact Statement (EIS), an analysis of REAE's environmental impacts required by the National Environmental Policy Act (NEPA). We also challenged the lack of evidentiary support for REAE's market need.

When FERC issued the Certificate to Transco in January 2023, the Delaware Riverkeeper Network and others sought rehearing of the Certificate, and ultimately petitioned for review of the Certificate in the United States Court of Appeals for the D.C. Circuit.

After collaborating with co-petitioners on briefing and oral argument, on **July 30, 2024**,

the D.C. Circuit granted our petition, ruling that FERC failed to support its finding that there was a market need for REAE and that it improperly ignored the project's climate change impacts, violating both the NGA and NEPA. The certificate was not only remanded to FERC, but was also vacated, meaning that once the Court's mandate issued, Transco would no longer have the legal right to operate the pipeline. This D.C. Circuit victory was a rare rebuke to FERC, and is the clearest statement from the court to date that the NGA requires FERC to evaluate the climate impacts of natural gas infrastructure when balancing a project's benefits and adverse impacts. This holding is significant, particularly in the face of recent legislative, executive, and judicial dismantling of NEPA protections.

Unfortunately, during the pendency of the case, Transco constructed the pipeline and began operations. The issuance of the court's mandate was delayed by Transco's motion for rehearing of the decision, which was supported by several industry groups.



Landscape view showing the Transco REAE Pipeline construction

Photo credit: F. Zerbe

Transco REAE Pipeline (cont.)



In the meantime, Transco petitioned FERC for an emergency certificate, which DRN and partners opposed. Rather than issuing an emergency Certificate, FERC prematurely reinstated Transco's Certificate. In doing so, FERC doubled down on its original justifications for granting the Certificate, and reinstated the Certificate with an order effective "upon issuance of the mandate" eliminating any potential for a gap in Transco's operations. The Delaware Riverkeeper Network and partners have requested rehearing of the Reinstatement Order.

Transco also sought a Clean Water Act (CWA) Section 401 Certification from the Pennsylvania Department of Environmental Protection (PADEP), which is required for federally authorized projects which may result in a discharge to waters within the CWA's jurisdiction. PADEP issued a conditional 401 Certification which was issued in March 2022, exactly one year after Transco first applied, requiring Transco to obtain additional permits in order to comply with the Certification. Those permits included Chapter 105 Water Obstruction and Encroachment Permits and a Chapter 102 Erosion and Sediment Control Permit.

Throughout 2022 and 2023, the Delaware Riverkeeper Network and partners submitted several comments and letters to PADEP addressing the project's impacts on streams, wetlands, and wildlife in Pennsylvania. When PADEP issued the permits in February 2023, Delaware Riverkeeper Network and Citizens for Pennsylvania's Future (PennFuture) administratively appealed those permits to the Pennsylvania Environmental Hearing Board (EHB). An administrative appeal

is allowed under Pennsylvania statute if a person is adversely affected by a PADEP permitting decision.

This appeal led to Transco filing a lawsuit in the United States District Court for the Middle District of Pennsylvania challenging the EHB's jurisdiction. Transco argued that the NGA preempted EHB's jurisdiction to hear the administrative appeal of the state issued permits and that any legal challenge was to proceed before the United States Court of Appeals for the Third Circuit. The District Court denied Transco's motion for preliminary injunction, and Transco appealed that denial to the Third Circuit.

On July 8, 2024, the Third Circuit issued a precedential decision affirming that environmental organizations have the right to administratively appeal pipeline permits issued by PADEP to the EHB. The argument that EHB's jurisdiction to hear appeals of PADEP permitting decisions is preempted by the NGA has been rejected by the United States District Court, the Commonwealth Court of Pennsylvania, the United States Court of Appeals for the Third Circuit Court, and the Supreme Court of Pennsylvania.

In September 2024, the Delaware Riverkeeper Network's administrative appeal of the state permits issuance went forward in a hearing before the EHB. DRN and PennFuture put forth evidence demonstrating that the permits made to Transco were made in error because they authorized the degradation of designated special protection waters, in violation of PADEP's own regulations, environmental protection statutes, and Pennsylvania's Green Amendment.



Tree-felling, sediment disturbance, habitat fragmentation: aftermath of the Transco REAE Pipeline construction
Photo credit: F. Zerbe

JULY



AUGUST

In July, members of Trout Unlimited alerted the Delaware Riverkeeper Network to a fishkill at Bushkill Creek. This creek is a High-Quality, Cold-Water Fishery in Northampton County, PA, that eventually flows into the Delaware River. Over the past 25 years, the Bushkill has all too frequently gone dry. Substantial evidence gathered over the years indicates that the quarry in Stockertown, owned and operated by Buzzi Unicem USA, is most likely the cause.

As quarries mine deeper into the earth, they can intercept groundwater, resulting in flooded mine workings that can only be accessed by pumping water out of the quarry. At Stockertown, the quarry pumps approximately 55 million gallons of water every day into Bushkill Creek. This discharge replaces a portion of the creek flows that are interrupted by mining activity.

On July 10, 2024, complaints were lodged by Delaware Riverkeeper Network and others concerned about the Bushkill Creek with the Pennsylvania Department of Environmental Protection reporting the dewatering, the killing of fish, and evidence of repeated poor management by the quarry which is not adequately operating pumps that are supposed to sustain creek flows that support fish and aquatic life.



2020 Bushkill Creek dewatering event
Photo credit: J. Baylog; Forks of the Delaware TU

Update: On November 24, 2024 another dewatering event and fish kill was reported by a Trout Unlimited angler. A complaint was filed by the angler and also the Delaware Riverkeeper Network with the Pennsylvania Department of Environmental Protection (PADEP) regarding this event due to the quarry pumps being shut down for a period of time. Photo evidence was submitted along with our complaint, which was logged by PADEP.



Podostemum survey volunteers

Photo credit: F. Zerbe

In late August, Dr. Erik Silldorff, and our paddling safety team, took a crew of volunteers out on the Lower Delaware River to survey for the elusive freshwater plant, *Podostemum ceratophyllum*, also known as “threadfoot” or “riverweed.” A very exciting discovery was made: the plant was identified and documented in four separate locations. This was a historic find since this rare aquatic plant has been missing from the Delaware River below the Lehigh confluence since the 1880s, but has now begun to return to our River.

The presence of this plant is a real-life example that the Clean Water Act is having long-lasting and meaningful effects on our ecosystem. The return of this pollution sensitive plant means that we have succeeded in cleaning up much of the contamination and pollution that plagued the Lower Delaware for decades, and have created water quality and habitat conditions that allows all species to thrive.



Close up shot of *Podostemum*

Photo credit: N. Macelko

Diving Deeper: Atlantic Sturgeon >>>

Since 1988, the Delaware Riverkeeper Network (DRN) has championed the protection of the Delaware River's genetically unique population of Atlantic sturgeon, *Acipenser oxyrinchus oxyrinchus*, which is found nowhere else in the world.

In late 2023, the US Environmental Protection Agency (EPA) proposed upgraded dissolved oxygen (DO) standards to protect sturgeon survival. The proposed standards were the direct result of a petition, submitted by the Delaware Riverkeeper Network and partner organizations in 2022, that requested the EPA exercise its legal authority to develop science-driven water quality standards.

In January 2024, DRN hosted an educational webinar for its members to explain what the EPA's proposed standards would mean for aquatic life in the Delaware River. We also submitted a preliminary comment urging the EPA to take swift action to protect the endangered Atlantic sturgeon, and not extend the comment period an additional 30 days as suggested by industry and dischargers.

Also **in January 2024**, we submitted a comment urging the National Marine Fisheries Service to rescind its draft Programmatic Environmental Assessment (PEA), which would issue permits authorizing collection of shortnose and Atlantic sturgeon from one river system for release into a second river system for scientific research and enhancement. The Delaware Riverkeeper Network firmly opposed the draft PEA and the concept of permitting translocation of sturgeon, because it was fundamentally flawed for failing to consider the ramifications of translocation for unique sturgeon populations.

In February 2024, the Delaware Riverkeeper Network submitted a 48-page comment in support of the EPA's decision to revise the designated use to protect aquatic life propagation and the corresponding DO criteria for the tidal Delaware River. The Delaware Riverkeeper Network wholeheartedly supported the determination

that existing dissolved oxygen standards are insufficient, but noted that while EPA's regulatory proposal is science-driven, it failed to respond to the scientific research demonstrating the need for even higher DO minimums and protections for Atlantic sturgeon.

In its comment, the Delaware Riverkeeper Network described additional and modified DO requirements, missing from the proposed rule, that are based on a full reflection of science and law, and are necessary given how perilously close the Delaware River Atlantic sturgeon are to extinction.

Also **in February**, Maya van Rossum, the Delaware Riverkeeper, was featured in an [interview with NBC10 Philadelphia](#). During the interview, van Rossum spoke about the proposed EPA water quality regulations and why the average Philadelphian should care about this issue. Not only does the Atlantic sturgeon deal with pollution from industries along the river, but the communities do as well.

The EPA failed to finalize the new DO standards within required timelines, a lapse that may have been due to the political pressure to stall implementation of the wastewater upgrades that would be necessary.

In August, the Delaware Riverkeeper Network filed a 60-day Notice of Intent to sue to require the standards be finalized. **On October 2, 2024**, the Delaware Riverkeeper Network filed a complaint in the US District Court for the Eastern District of Pennsylvania. As a result of this legal action, the timelines for approval of the revised standards were set back in motion, with the first water quality standard upgrades for the Delaware Estuary since 1967 now expected in mid-2025.

Update: EPA announced its commitment to finalize the revised DO standards in April 2025 due to DRN's consistent and diligent fight to protect the Atlantic sturgeon.

In July 2024, the Delaware Riverkeeper Network and a partner organization also sent three states



NBC10 Philadelphia interview with Maya van Rossum, the Delaware Riverkeeper

Photo credit: A. van Rossum

Atlantic Sturgeon (cont.)



(New York, New Jersey, and Delaware) Notices of Intent to sue over the illegal take of Atlantic sturgeon. The NOIs detailed the states' failure to apply for and obtain incidental take permits for state-authorized commercial fisheries operating

within endangered Atlantic sturgeon habitat. "Take" refers to the catching and killing of an endangered species. The Delaware Riverkeeper Network discovered that New York, New Jersey, and Delaware failed to implement requirements of the Endangered Species Act (ESA) to minimize by-catch of Atlantic sturgeon by commercial fisheries that target other aquatic species.

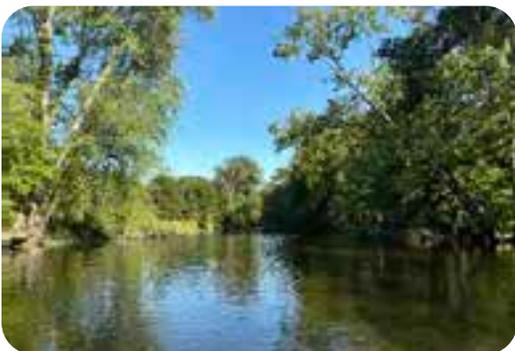
In October 2024, the Delaware Riverkeeper Network and our partner organization initiated three separate lawsuits to protect the Atlantic sturgeon. We filed lawsuits against New York, New Jersey, and Delaware after none of the states redressed their violations by obtaining the incidental take permits under the ESA. The lawsuits made a nationwide impact, spurring discussion in states from Maine to Florida and prompted them to assess their Atlantic sturgeon by-catch, including the need to obtain incidental take permits. Another result is that states are now developing habitat conservation plans, and considering actions to reduce Atlantic sturgeon mortality all along the east coast.



Delaware Riverkeeper, Maya van Rossum and Delaware Riverkeeper Network staff at our sturgeon press conference

Photo credit: D. Guyer

From the Field: Mussel Surveys



Clockwise from top left:
The Paulins Kill River, *E. Silldorff* | Mussel monitoring equipment, *E. Silldorff* | American Eel, *E. Silldorff* | Mussel survey volunteers, *T. Gyorfy*

From August to September, the Delaware Riverkeeper Network led five survey expeditions for pearly mussels on the Paulins Kill River. Pearly mussels, a locally-evolved freshwater bivalve, are considered keystone species since they serve as food for many other species.

The Paulins Kill is a tributary of the Delaware River and harbors a great diversity of freshwater mussels. Thanks to the 2018 Columbia Lake dam removal, migratory fish have returned for the first time in over a century. The Delaware Riverkeeper Network's Senior Scientist, Dr. Erik Silldorff, instructed volunteers on the biology of freshwater mussels and survey techniques. Volunteers documented high densities of pearly mussels in the Paulins Kill. Funding for this project came from the Appalachian Mountain Club's Waters and River Protection Fund (AMC), with all gear being provided by Delaware Riverkeeper Network.



Pearly mussel
Photo credit: N. Macelko

In October, the Delaware Riverkeeper Network presented a petition to the Town of Highland Town Board at their monthly meeting for the adoption of a moratorium on any new development, expanding development, or change in land use within the Upper Delaware Scenic and Recreational River corridor portion of the Town. We are petitioning the Town of Highland to adopt this moratorium on development in the Upper Delaware Scenic and Recreational River Corridor within the Town's boundaries while the Town conducts its 10-year Comprehensive Plan Review. A moratorium is appropriate and necessary because any amendments to the Town's Comprehensive Plan undertaken during this review will likely impact the Town's municipal ordinances, such as the Town's Zoning Code. A moratorium would protect the Town from a rush of development while its Comprehensive Plan and municipal ordinances are most uncertain. Most importantly, the petition called on the Town to fulfill its constitutional obligation pursuant to New York State Constitution Article 1, Section 19, also called the "New York Green Amendment," to protect New Yorkers' environmental rights (*read more about our Camp FIMFO efforts on pages 14 and 15*).

Also **in October**, the Delaware Riverkeeper Network filed a Notice of Appeal with the Pennsylvania Environmental Hearing Board (EHB) challenging the Pennsylvania Department of Environmental Protection's (PADEP) approval of the land application of sewage sludge or "biosolids." Biosolids would be applied by the Nazareth Borough Municipal Authority at the Hower Farm located in Plainfield Township, Northampton County. This farm is enrolled in Pennsylvania's Farmland Preservation Program, and is surrounded by creeks that are protected under Pennsylvania's Special Protection Waters program.

This decision to spread Class B biosolids ignited opposition from the regional community and Plainfield Township. Biosolids can be contaminated with per- and polyfluoroalkyl substances (PFAS), also known as "forever chemicals" because they don't break down in the environment. However, they can leach into waterways or be taken up by crops grown on contaminated farmlands.

The Delaware Riverkeeper Network maintains the position that the spreading of these biosolids is a violation of several federal and state environmental laws, including Article 1, Section 27 of the Pennsylvania constitution, Pennsylvania's Green Amendment. The application of biosolids will threaten the water quality of the creeks surrounding this farm as well as threaten bog turtle habitat that is found in and around this area. Also at risk are Exceptional Value wetlands that are on or adjacent to the property and area groundwater.

In November, the New Jersey Department of Environmental Protection (NJDEP), held an informational meeting to discuss the outcome of New Jersey Department of Environmental Protection v. Solvay, a significant environmental lawsuit regarding widespread pollution of per-and polyfluoroalkyl (PFAS) from the Solvay West Deptford facility. When the proposed settlement was put out for public comment in 2023, the Delaware Riverkeeper Network submitted comments, opposing many sections of the settlement agreement, and called for more protections to the affected community and for Solvay to pay more to ensure proper cleanup and remediation would not fall on the taxpayers.

The Delaware Riverkeeper Network attended to learn how NJDEP plans to protect public-health from this type of pollution and gather information on “third generation” PFAS by-products discovered in the environment around the facility. Solvay claims they are using PFAS-free manufacturing in their processing and not releasing PFAS in the environment. In fact, these third-generation chemicals break down into PFAS when released. No information is available on the toxicity of these chemicals, whether filtrations systems remove these chemicals from drinking water, and what these new chemicals mean for the people who live in the communities around the Solvay facility.

Also, Delaware Riverkeeper Network was in attendance during the November meeting to record it for our members that would like to know more about what transpired during the talks. [View the recording here.](#) Additionally, steps were outlined for community members to take if contamination is found and how long they have to file a claim with the state.

Tracy Carluccio, Deputy Director of Delaware Riverkeeper Network, questioned NJDEP over the legitimacy of the

third-generation chemicals and the settlement paying for current and future remediation efforts, including public participation in the planning process of the cleanup.



Tracy Carluccio questioning NJDEP

Photo credit: E. Rogers

In December, the Delaware Riverkeeper Network weighed in on two warehouses proposed for watersheds in Monroe County that are supposed to receive antidegradation protections. The testimony was provided during a public hearing on the proposed Orchard BJK warehouse in Coolbaugh Township. We urged the Pennsylvania Department of Environmental Protection (PADEP) to deny the Joint Permit Application for the Orchard BJK Lot 1 sewer line, which would run through 489-feet of Exceptional Value (EV) wetlands and directly across 15 linear feet of the High Quality (HQ) Hawkey Run.

We also submitted comment to Request to Deny the Application or Extend Public Comment with a Public Hearing regarding the 115 Associates Warehouse, LLC, development in Tunkhannock Township. Developers of the 115 Associates Warehouse are proposing to discharge to the EV-designated Tunkhannock Creek and EV-designated wetlands associated with Keiper Run, as well as to destroy 40 acres of forest. The Delaware Riverkeeper Network has been working with community organizations in the Pocono area for years to oppose this warehouse.

Update: *The Pennsylvania Department of Environmental Protection scheduled a public hearing for March 3, 2025, to seek input on the state stormwater permit needed for the 115 Associates Warehouse. The Delaware Riverkeeper Network was on hand to give testimony at this hearing attended by many local residents.*

Diving Deeper: Camp FIMFO



Northgate Resorts, a company based in Grand Rapids, MI, has proposed to convert the former Kittatinny Campgrounds in the Town of Highland (Sullivan County, NY) into an amusement park operation it calls “Camp FIMFO.” The fight against this proposed development began in 2022. Since then, the Delaware Riverkeeper Network has stood by its commitment to preserve the Upper Delaware Scenic and Recreational River Corridor, which is federally designated and protected under the Wild and Scenic Rivers Act.

The proposed Camp FIMFO project would transform most of what were low-impact tent campsites to RV sites, cabins, and glamping structures equipped with water, sewage, and/or electric hook ups; construct water slides, multiple pools, and a mini golf course; expand parking areas and on-site septic systems, construct acres of impervious surfaces, and increase water and wastewater flows at the campground by an estimated 550% and 460% respectively.

Thousands of feet of propane distribution and utility lines are proposed, as well as demolition of several of the existing buildings to replace with new infrastructure. The proposed facilities will require intrusive and disruptive construction methods, like soil grading, trenching, grubbing, tree removal, and hydraulic hammering, and would disturb 41.5 acres of land.



Brook flowing through Kittatinny Campgrounds

Photo credit: J. Palmer

During 2024, the Delaware Riverkeeper Network continued to fight alongside local communities to stop Northgate Resorts from causing irreparable harm to the Town of Highland and the Upper Delaware Scenic and Recreational River Corridor. According to one official on the Upper Delaware Council, this is the largest development project ever to come to the region. The New York State Environmental Quality Review Act (SEQR) requires any proposals that may cause substantial adverse environmental harm to be reviewed through an Environmental Impact Statement (EIS).

In June of 2024, Camp FIMFO submitted its first draft EIS, which was reviewed by the Town of Highland Planning Board (Planning Board), which, along with the Town Engineer, the Upper Delaware Council (UDC), and the National Park Service (NPS), identified concerns and issues that were unaddressed in the draft. The Planning Board provided Northgate Resorts with its list of concerns and requested they be addressed in the next draft. Northgate Resorts submitted a subsequent draft in August 2024. The Planning Board, along with UDC and NPS, reviewed the draft EIS and compiled another lengthy list of concerns.

Northgate Resorts was sent back to the drawing board to provide yet another draft EIS. Northgate Resorts presented its third draft in October 2024. The next month, the Planning Board accepted the EIS as adequate for public comment, and set the deadline for public comment on the draft EIS for January 10, 2025.

The Planning Board also held a public hearing in December 2024 to receive verbal testimony on



Delaware Riverkeeper Network staff at the December 2024 public hearing on Camp FIMFO

Photo credit: DRN Staff

Camp FIMFO (cont.)

the draft EIS. Attendees of the public hearing were informed that a court reporter was present to accurately capture all testimony in a transcript that would be uploaded to the Town's website. Under SEQR, such a transcript is necessary for preparation of the final EIS, which must include all substantive comments as well as a response to each comment. Upon inspection of the transcript, the Delaware Riverkeeper Network was astonished to discover 61 instances of "inaudible" in place of testimony, and several portions of testimony either omitted or inaccurately transcribed. The Planning Board did not notify the public of the insufficiencies in the transcript; instead,

the issues were uncovered by the Delaware Riverkeeper Network and community members, who immediately alerted Town of Highland authorities, but the problems with the transcript were only discovered on January 7, 2025, just three days before the public comment period closed.

Update: Immediately upon discovering the insufficiencies in the public hearing transcript, the Delaware Riverkeeper Network wrote to the Planning Board demanding immediate action by the Planning Board to rectify this failing. The Planning Board heeded our requests and extended the public comment period until March 11, 2025.

From the Field: Podostemum Survey



Clockwise from top left:
Dr. Silldorff, F. Zerbe | Volunteers canoeing, N. Macelko | Podostemum sighting, N. Macelko | Volunteers canoeing, N. Macelko | Quick stop to examine a finding, N. Macelko

2024 BY THE NUMBERS

- Our membership base grew by **1,842 people**
- Our staff attended **18 speaking or tabling events**
- We helped over **50 watershed & local community groups** with technical assistance, watershed restoration, or monitoring efforts
- We biked **18 miles** along the Delaware River with our members (*Save the 2025 ride date: 11/8/25*)



Cyclists during our 2024 bike ride
Photo credit: C. Towne

- We hosted or co-hosted **6 paddle events**
- We connected **208 people** to the River
- Kayaking trips we led paddled **56 river miles**



Kayakers during 2024 paddle event
Photo credit: J. Palmer

- We produced **3 hours, 59 minutes, and 24 seconds of informational video footage** of our work in the Watershed, recaps of informational meetings, and more for a total of **22 videos** to share with our members
- **We livestreamed 5 hours, 33 minutes, and 34 seconds covering 7** informational meetings, rallies, and more for our members who could not attend in person
- We held **11 webinars** covering topics ranging from dissolved oxygen levels in the River to the proposed development of Camp FIMFO to MACH2 hydrogen hub



Recording of a presentation
Photo credit: F. Foley

HOW TO SUPPORT A CLEANER AND HEALTHIER DELAWARE RIVER

From the Mongaup River to the Schuylkill and from the Copper River to the Mispillion, no one works harder for the Delaware River, its streams, and its communities. With new threats emerging everyday in the Watershed, a gift to the Delaware Riverkeeper Network ensures that we have the resources to protect our Delaware River and its communities against any and all negative threats.

As a community-supported watershed organization, every gift we receive has a profound impact on our ability to continue our much-needed work.

The Delaware Riverkeeper Network is a 501(c)(3) nonprofit organization that stewards charitable contributions and assets responsibly. We are proud to have earned a four-star rating on Charity Navigator.



As we navigate funding challenges, we are so grateful for the support of our members and everyday individuals that care about sustained stewardship of the Delaware River Watershed. Below is a list of ways you can make a gift today. Please contact development@delawareriverkeeper.org if you have any questions or need further details.



Online: bit.ly/SupportDelawareRiver



Planned Giving: Secure your legacy by leaving the Delaware Riverkeeper Network a bequest in your will.



By Mail: Please make checks payable to Delaware Riverkeeper Network
Mail to: 925 Canal Street, Suite 3701,
Bristol, PA 19007



IRA Disbursements: Please use this information to make an IRA distribution.

EIN: 74-3255972

Address: 925 Canal Street, Suite 3701, Bristol, PA 19007



Donor Advised Funds: A great vehicle for giving and supporting our work. Check out our [DAF widget](#) on our website!

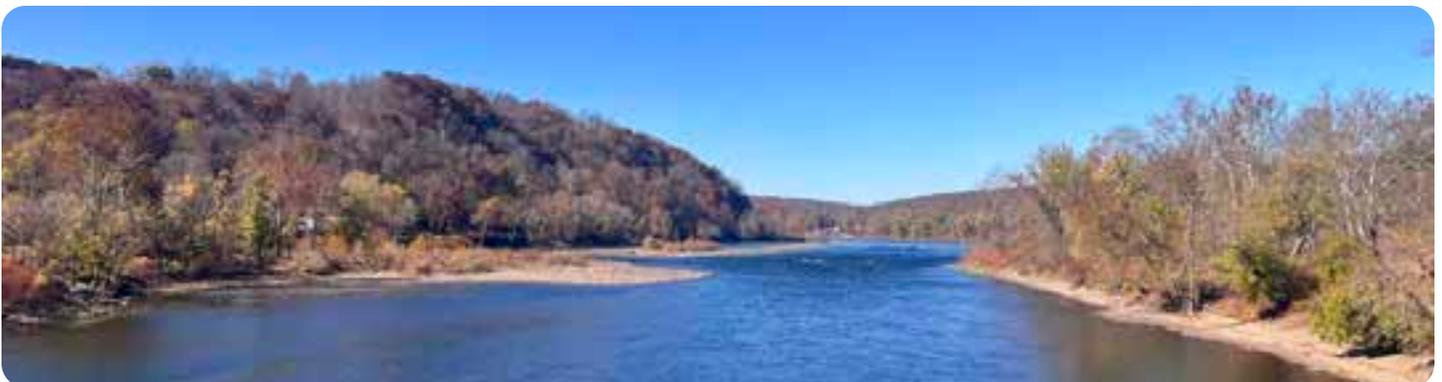


Stocks and Bonds: DRN accepts these forms of donations, but they will be liquidated immediately.

To report a pollution incident, **contact the Delaware Riverkeeper Network:**

- Call **1-800-8DELAWARE**
- Online at delawareriverkeeper.org/take-action/report-pollution-incident/

We can help you take the action necessary to stop the harm.



OUR STAFF

MAYA K. VAN ROSSUM, the Delaware Riverkeeper

The Delaware Riverkeeper is charged with giving a voice to the Delaware River, its tributaries, and all the communities that appreciate and depend upon them.

The Delaware Riverkeeper is supported by:

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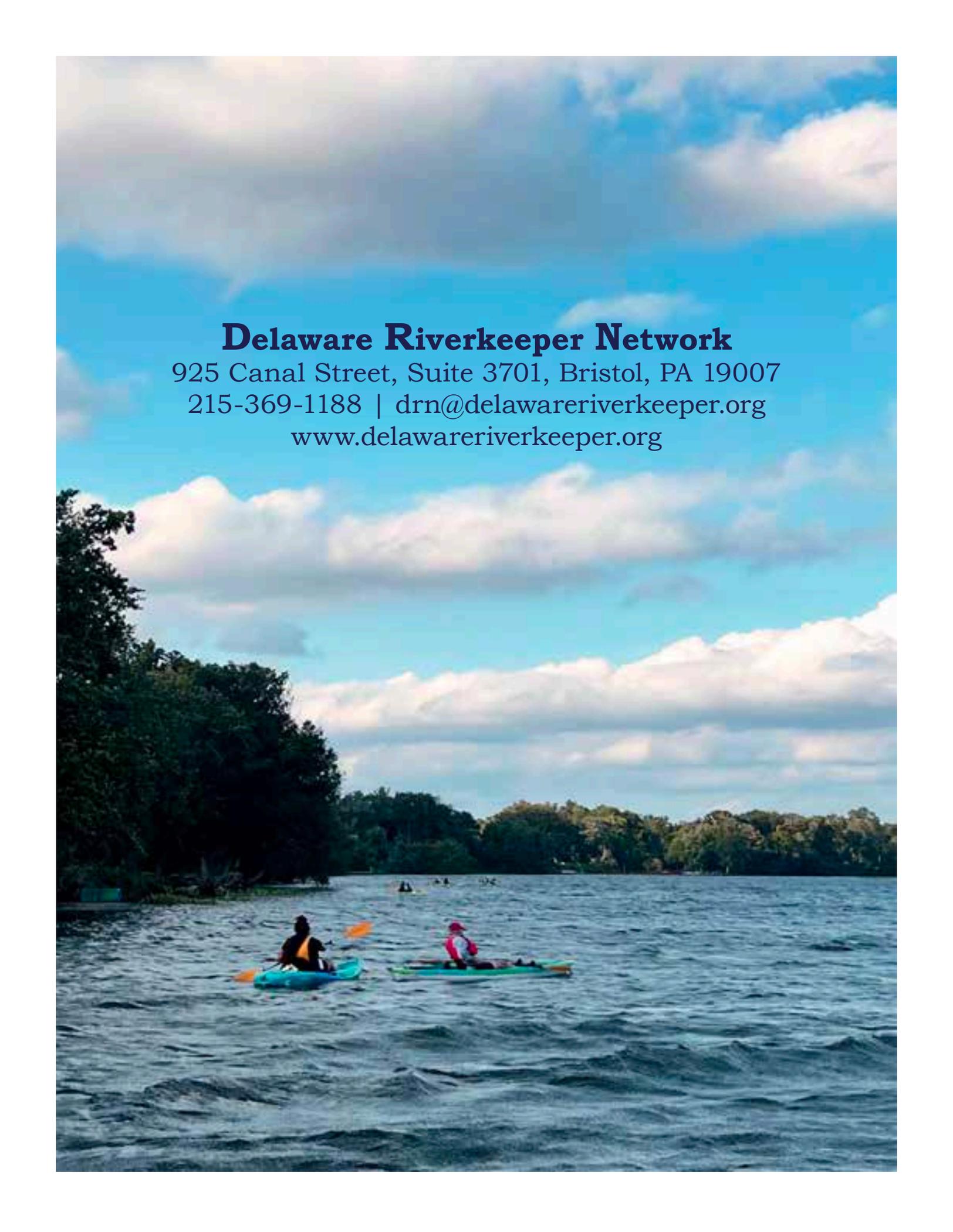
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Maya K. van Rossum,
the Delaware Riverkeeper

Photo credit: A. van Rossum

A scenic view of a river with kayakers under a blue sky with white clouds. The river is in the foreground, with two kayakers in the middle ground. The background shows a dense line of trees along the riverbank. The sky is filled with soft, white clouds, and the overall atmosphere is bright and clear.

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