

**Written Determination
First State National Historical Park**

BACKGROUND

The National Park Service (NPS) has prepared a Comprehensive Trail Plan and Environmental Assessment (EA) for the Brandywine Valley unit of First State National Historical Park. The EA identifies a preferred alternative that would allow bicycle use on approximately 25 miles of trails in the Brandywine Valley. On November 11, 2024, the Regional Director for Interior Region 1, Northeast Region, signed a Finding of No Significant Impact (FONSI) selecting the preferred alternative for implementation.

Under the selected alternative, bicycle use will be allowed on the following multi-use trails:

Trail Name	Total Approximate Distance (mi)	Start Point	End Point
Beaver Dam Trail	1.34	Smith Bridge Parking Lot (Lot 3)	Smith Bridge Parking Lot (Lot 3)
Boundary Marker Trail	1.02	Lot 1	Delaware/Pennsylvania border near Woodlawn Trustees
Chandler's Hollow Trail	0.96	Parking lot near the 3-way intersection on Beaver Valley Road	Boundary Marker Trail
Coyote Ridge Trail	0.80	North of Ramsey Parking Lot (Lot 4)	Gate near the Ramsey Quarry
Hurricane Run Loop Trail	0.96	500 Woodlawn Road	501 Woodlawn Road
Lower Creek Trail	1.42	Smith Bridge Parking Lot (Lot 3)	Smith Bridge Parking Lot (Lot 3)
North Quarry Trail	1.70	Across the road from Lot 1	Smith Bridge Road
Pasture Loop Trail	1.07	500 Woodlawn Road	501 Woodlawn Road
Pipeline Ridge Loop	2.14	At the three-way intersection of Beaver Valley Road and Dam Road	At the three-way intersection of Beaver Valley Road and Dam Road

Ramsey Loop	2.08	Ramsey Park Lot (Lot 4)	Ramsey Park Lot (Lot 4)
Rocky Run Loop Trail	1.27	Marrit Hotel Parking Lot (Lot 5)	Marrit Hotel Parking Lot (Lot 5)
Woodlawn Trail	1.05	Gate on Ramsey Road	Cross walk on Beaver Valley Road
Connector Trails C1 through C51	9.0		

WRITTEN DETERMINATION

NPS regulations in 36 CFR 4.30 require the NPS to determine that bicycle use on administrative roads and trails is consistent with the protection of the park area's natural, scenic and aesthetic values, safety considerations and management objectives, and will not disturb wildlife or park resources. The EA and the FONSI provide information and context for this written determination, including additional analysis of the potential effects of bicycle use on park resources and visitors. The EA and FONSI are available online at <https://parkplanning.nps.gov/frst> by clicking the link entitled “BRVA-Comprehensive Trail Plan” and then clicking the link entitled “Document List.”

Purpose and Significance of the Park.

First State National Historical Park preserves and protects Delaware's nationally significant cultural and historic resources associated with early settlement of the Delaware Valley by the Dutch, Swedish, Finnish, and English; Delaware's role in the establishment of the nation; and as the first State to ratify the Constitution. The park includes six distinct units, five of which are owned and managed by partners. Although the units are geographically dispersed, together they tell the story of Delaware's foundational contributions to early American settlement and nation-building while preserving representative cultural landscapes and historic resources.

Significance statements express why a park's resources and values are important enough to merit designation as a unit of the National Park System. These statements are linked to the purpose of the park, and are supported by data, research, and consensus. Statements of significance describe the distinctive nature of the park and why an area is important within a global, national, regional, and systemwide context. They focus on the most important resources and values that will assist in park planning and management.

The following significance statement has been identified for the Brandywine Valley unit:

- Brandywine Valley—a 1,359-acre tract north of Wilmington—is an integral component and legacy of Quaker industrialist William Poole Bancroft's vision for open park lands and the conservation of green space as part of his larger philanthropic community planning experiment in the City of Wilmington that drew upon national and international currents of early 20th century social and industrial reform.

Fundamental resources and values of the park are those features, systems, processes, experiences, stories, scenes, sounds, smells, or other attributes that are essential to achieving the purpose of the park and maintaining its significance.

The park's 2022 Foundation Document identifies the fundamental resources and values of Brandywine Valley unit, previously known as Woodlawn or Beaver Valley. This area consists of 1,359 acres of rolling hills and wooded areas along the Brandywine River and the arced border between northern Delaware and southern Pennsylvania. This land was first deeded to William Penn and reflects early Quaker settlement patterns and Native American migration. In 1906, William Poole Bancroft purchased this bucolic property to preserve the beauty of the Brandywine Valley for future generations. Since then, the land served as a privately-owned park until it was donated to the National Park Service in 2013.

Natural, Scenic, and Aesthetic Values.

The Brandywine Valley unit is within the Piedmont physiographic region of Delaware and Pennsylvania. This region represents the foothills of the Appalachian Mountain range and is characterized by rolling hills interspersed by stream valleys. The highest northeastern ridges are about 400 feet above sea level and its lowest point, where Brandywine Creek flows south toward Wilmington, Delaware, is roughly 150 feet above sea level. Land cover is primarily agricultural fields, pastures, and forested hills. Approximately 48 percent of the unit's land is agricultural fields and pastures. Winding roads and farmsteads reveal evidence of early European settlement of the valley and the historic community.

The current trail network consists of historical farm roads and singletrack trails, all with natural or unpaved surfacing. In general, the singletrack trails have tread widths of 24 to 48 inches. The NPS designed the proposed trail network to take visitors, including bicyclists, to scenic overlooks that highlight the forested and agricultural landscape (e.g., trails NCP10 and NCP12 north of Ramsey Road), improve interpretation of historic structures (e.g., trails NP15 and N21 near the Samuel Tawley sawmill), and emphasize the agricultural and industrial history of the area. System trails afford views of land not open for physical public access.

The proposed construction of 8.5 miles of new shared-use trails and site-specific trail modifications and upgrades on 15 miles of existing trails would result in temporary and permanent vegetation clearing. Trail construction activities would be distributed throughout the unit and would avoid clearing large trees to the extent feasible. New trails would not adversely impact the cultural landscape because their natural surface and narrow width would allow them to blend discretely into the landscape. Bicycle use on such trails has no unique visual impacts compared to hiking or equestrian use, as the activity does not change vegetation patterns, introduce new infrastructure, or expand the visible footprint of the trail.

Signage or other wayfinding at trailheads, trail intersections, and at the park unit boundary would be limited and designed to be as visually unobtrusive as possible while improving navigation for visitors, and allowing them to follow loop opportunities that involve travel on multiple trails to more fully enjoy the natural, scenic and aesthetic values of the Brandywine Valley.

Safety Considerations.

The proposed trail system is intentionally designed to enhance visitor safety through targeted realignments, closures, and new construction. Many trail closures and reroutes address a specific safety concern. For example, trails located near surface mines will be closed or rerouted because their proximity poses direct safety risks to visitors. Along the Ramsey Road corridor, trail realignments will address several unsafe road-trail intersections and reduce safety risks

associated with the nearby roadway. At intersections with public roads, the NPS would implement best management practices and coordinate with transportation agencies as appropriate to minimize safety risks. In the Rocky Run area, steep trails that present both safety hazards and erosion problems will be closed and replaced with looped trail options built at more sustainable, safer grades that help limit uncontrolled downhill speed and increase visibility, reducing potential user conflict and allowing bicyclists and other users to see oncoming traffic.

The park will use an adaptive monitoring program to help guide future management decisions so that increasing or changing patterns of visitor use do not lead to crowding, conflict, degraded trail conditions, or diminished enjoyment of park resources. Monitoring may include tracking visitation through tools such as trail counters and transportation data, along with periodic data collection to understand visitor use patterns, user characteristics, and potential conflicts. Staff will document and monitor law enforcement incidents and proactively address safety concerns through signs, bulletin boards, and direct communication with visitors. Routine patrols, ranger interactions, and information from other resource monitoring programs will inform the analysis and management of current and future recreational activities. When conflicts or safety incidents occur, the park will respond using established law enforcement protocols, and incident reports will be reviewed by safety committees and shared with park staff to support informed decision-making.

The park will use signage, visitor education, and enforcement tools—including citations when appropriate—to reinforce safe and responsible bicycle use. Updated online and on-site information will help visitors understand designated routes, safety expectations, and rules related to bicycle and e-bike use.

Management Objectives.

Overall management objectives for the park are guided by NPS Management Policies 2006, which direct superintendents to develop management plans that allow for recreation in National Park System units, but in a manner that avoids unacceptable impacts to park resources or values. See NPS Management Policies 2006, Section 8.2.2.1. They also emphasize the need for alternative transportation systems, especially those that promote nonmotorized means of accessing and moving within System units. See NPS Management Policies 2006, Section 9.2.

The NPS has established management objectives for the park in the Foundation Document, and management objectives for trail use are established in the EA. These documents promote an appropriate balance between visitor access and enjoyment, and the protection of park resources. One way to further this management objective is to increase visitor appreciation and understanding of the resources and values of the park by providing experiences that foster deeper connections with them. This strategy enhances visitor satisfaction and promotes responsible recreation, as users are encouraged to experience and respect the natural and cultural resources found throughout the park.

Under the selected alternative, the existing trail system will undergo a full-scale redevelopment to create a sustainable, manageable system that provides diverse, high-quality experiences for visitors. Engineering improvements will enable the trail system to accommodate visitor use levels on a sustainable basis. The new trail system will promote connectivity across properties, allow for continuation of bicycling, and result in the construction of new trails better suited to facilitating visitor use and experience. For example, it would promote consistency with the Brandywine Creek State Park trails plan, further improve safety when combined with the recent

road crossing safety upgrades, and ensure consistency with leased agricultural operations.

Wildlife and Park Resources.

The EA and FONSI concluded that resources in the park, including cultural and natural resources and sensitive species, would not be impaired or significantly impacted by continued bicycle use on the existing trails or expanded bicycle use on new multi-use trails. Although trails that allow bicycle use are prone to short-term impacts along trail edges when bikers occasionally travel off trail into vegetated areas, the NPS can mitigate these impacts through trail design and visitor education. Further, by reducing the number of locations where recreational users cross streams, and by implementing design features such as rock armoring through at-grade water crossings, adverse impacts on water resources would be reduced. Wildlife habitat is present throughout the Brandywine Valley, supporting species such as coyotes, white-tailed deer, eastern gray squirrel, eastern cottontail rabbit, Virginia opossum, raccoon, salamanders, frogs, snakes, and birds. The trail plan would be implemented in an area that receives frequent human visitation. Local wildlife is habituated to human use of the landscape and typically avoid encounters with humans; as a result, continued public use of trails would not adversely affect wildlife. Bicycling and other non-motorized uses would not contribute to the loss of habitat that is detrimental to wildlife because visitors generally stay on or close to trails.

The NPS consulted with the Pennsylvania Natural Heritage Program and the Delaware Department of Natural Resources and Environmental Control to identify state-listed and rare species that may occur within or near the project area. These reviews highlighted the presence of sensitive habitats, including wetlands that may provide potential habitat for the federally threatened bog turtle. Based on a Phase I investigation, the NPS incorporated these wetlands into project planning and is conducting Phase II surveys to determine presence or probable absence of the species. To avoid impacts on bog turtles and their habitat, the NPS will actively monitor new trail construction near wetlands identified as potential habitat and implement mitigation measures, including avoidance of sensitive areas and modifications to construction timing and methods. Wetland impacts will also be minimized through best management practices and by avoiding new trail construction in wetlands wherever practicable.

Further, the NPS consulted with the Delaware Nation, Delaware Tribe of Indians, and the State Historic Preservation Offices of Delaware and Pennsylvania to meet its responsibilities under Section 106 of the National Historic Preservation Act. The agencies developed a programmatic agreement establishing a framework for ongoing consultation to avoid, minimize, and—if necessary—mitigate adverse effects on cultural resources. The Pennsylvania SHPO signed the agreement on September 23, 2024, followed by the Delaware SHPO on September 26, 2024; the Delaware Nation and Delaware Tribe concurred, and Chadds Ford Township joined as a consulting party. Taken together, these consultations and mitigation measures will ensure that the NPS continues to protect wetlands, sensitive species such as the bog turtle, and the broader cultural and natural resources of the Brandywine Valley unit throughout trail construction and subsequent visitor-use activities, including bicycling.

Conclusion.

Based upon the foregoing and as required by 36 CFR 4.30, the NPS has determined that bicycle use on the 25 miles of multi-use trails identified above is consistent with the protection of the park's natural, scenic, and aesthetic values; safety considerations; management objectives; and

will not disturb wildlife or park resources.