

Delaware National Coastal Special Resource Study and Environmental Assessment

Public Comments and Responses

January 2009

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Comments and Responses - Overview

The Delaware National Coastal Special Resource Study/Environmental Assessment (SRS) was made available for public review and comment between November 24, 2008 and December 26, 2008. The public was notified of its availability through media notices, study direct mail of the report, and email. The National Park Service held a public meeting on December 15, 2008 in Dover Delaware at the State Archives at which 69 people attended.

During the 30-day public comment period, 21 comments were received through the NPS Planning, Environment and Public Comment website, directly by email, and through the post. Most expressed explicit support for Alternative B (the selected alternative) that would provide for potential congressional authorization of a national historical park including resources related to early Dutch, Swedish and English settlement and Delaware's role as the first state in New Castle, Dover and Wilmington, Delaware. None favored the other action alternative, the establishment of a national historic site at Fort Christina and Holy trinity (Old Swedes) Church. Two respondents did not favor the potential units as described in both action alternatives. Comment letters included correspondence from state and local agencies, organizations and individuals, as well as tribal interests.

This public response document contains comments (organized by topic), responses to the comments, and errata showing changes that have been made in response to comments. In some cases, comments were deemed to be duplicative of other comments and such duplicative comments have not received individual responses in this document. This public response document, along with the study report and a Finding of No Significant Impact, completes the Delaware National Coastal Special Resource Study process. The document has been sent to all those who provided comments on the study.

The National Park Service study team wishes to express its appreciation to all who took the time to share their views on this study, including public officials, tribal representatives, organizations and private individuals. Presented here are excerpted comments that indicate the richness and range of views about the potential establishment of a national historical park in the state of Delaware.

Originals of all of the public comments received and reviewed are on file in the NPS offices at 200 Chestnut Street, Philadelphia, Pennsylvania.

Comments Supporting the Selected Alternative

Of the forty five comments received, twenty nine were directly supportive of Alternative B. All except three of the other comments received did not object to the choice of the selected alternative. Comment excerpts which included those of local governments were:

1. I hope that the Delaware National Park will become a reality, and that its hub will be situated in New Castle, because I feel that this town is a national treasure which needs protection, and one that also warrants exposure so that people in the rest of the country can enjoy its charm and learn about its place in American history. From my limited experience of the National Park Service, I think we would have only benefits from a connection with the NPS.

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2. "Please accept these official comments from me as the New Castle City Administrator and also as a resident of Delaware and New Castle.

I am in support of the report issued by the NPS outlining the establishment of a National Park in Delaware. In particular, I agree with the NPS conclusion that "Alternative B" is both the "Environmentally Preferred" alternative and the alternative which is "Most Effective and Efficient".

As I am sure you are already aware, and as evidenced by participation of New Castle City elected officials and residents at the NPS meetings, there is a great deal of support within my community for this proposed project. There are wonderful stories of history that come to life as they are told in this very specially preserved setting. We are enthusiastic about sharing those stories with the world, and look forward to that opportunity with a new National Park established in Delaware, with the City of New Castle serving as the hub of it all.

3. I am a resident of New Castle, Delaware. I approve the proposed plan to have NPS's hub here in town. I am involved in the activities of the New Castle Historical Society & think that this would enhance our programs.

4. As a resident of New Castle, Delaware, member of the Historic New Castle Alliance and Director of Sales and Marketing for the Greater Wilmington Convention and Visitors Bureau, I would like to echo the comments.... made by.....the New Castle City Administrator and resident of Delaware and New Castle. I am in support of the report issued by the NPS outlining the establishment of a National Park in Delaware. In particular, I agree with the NPS conclusion that "Alternative B" is both the 'Environmentally Preferred' alternative and the alternative which is "Most Effective and Efficient".

5. On behalf of the Olds Swedes Foundation, we wish to express our gratitude for the consideration expressed in the Delaware National Coastal Special Resources Study and Environmental Assessment, regarding the Old Swedes Church and its surrounding area. We believe that Old Swedes and its surrounding area represent an untold story of national significance.

We especially like the boundaries of Alternative B, which takes in venues in all three Delaware counties. However, if for some reason Alternative B would not be feasible we, heartily endorse Alternative C.

We thank you for the exceptional work on this project. It was a formidable task and the report you created in a year was thorough and thought provoking. The Old Swedes Foundation stands ready to work with you in the near future.

6. This proposal is a win/win for the State of Delaware and its citizens, the National Park Service and the residents of the City of new Castle for the following reasons:

1. It provides a National Park in the only State that doesn't have one.
2. It connects a number of historical sites.
3. The hub, the City of New Castle is accessible by land, sea and air and has the potential of being accessed by rail and bicycle if additional state and federal resources are allocated.
4. It provides the opportunity for significant educational opportunities in colonial living, historic preservation and multi-national heritage study.

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5. Its unique emphasis on a number of sites in the state in easy travel distance could provide a model for other states.

7. Thank you for the opportunity to provide comments on this draft document. Overall, I would like to say that I support the preferred alternative (Alternative B) that the NPS team proposes. I agree that the early colonial settlement of the Swedish, Dutch and English is an excellent theme and that this theme is not adequately represented anywhere else in the NPS system.

8. I want to thank you for your efforts to bring a unit of the National Park Service to Delaware. As a New Castle resident and Executive Director of the New Castle Historical Society, I want to express my support for Historic New Castle as the location for a National Park visitor center and office.

Based on the information presented in this report and at recent meetings with the National Park Service at the New Castle Court House and Buena Vista, I believe New Castle is an ideal match with the Park Service's recommended themes of early European settlement and events leading to the founding of a new nation and particularly Delaware's unique position as the First State. No other place in Delaware so completely reflects these themes through easily accessible resources like New Castle's existing museums, historic buildings and open space.

9. Other than Alternative A, Old Swedes Foundation is pleased to be included in both Alternative B and Alternative C. I especially like the boundaries of Alternative B, which takes in venues in all three Delaware counties. I believe this was Senator Carper's intent from early proposals. I also like the fact that Alternative B carries the designation of National Park, which I feel has stronger appeal than any other designation. It would seem Holy Trinity (Old Swedes) Church, along with Fort Christina, could be included and well served with either alternative. However, it is my opinion that the boundaries of Alternative B should be extended to include Holy Trinity (Old Swedes) Church and Fort Christina with the designation of a National Park, not just a National Historic site (i.e. combine Alternative B and C).

10. Thank you for providing this opportunity to comment on the proposal to designate a portion of the Delaware coastline as a National Park. As a school teacher in Delaware for more than 30 years, I have long believed that, due to the small size of this state, we could easily have a designated historical timeline progression beginning with the founding of the Swedish settlers at "The Rocks" where the Kalmar Nyckel, Delaware's replica tall ship and goodwill ambassador is presently berthed, through New Castle, to the John Dickinson Plantation, all within easy reach.

11. As executive director of the Delaware Historical Society I heartily support the concept of a national park in the First State. I understand and support your selection of the two primary themes and the rejection of the previously suggested themes.

12. I agree with the NPS recommendation to designate a National Historic Park centered in downtown New Castle and encompassing several other sites in Delaware, as described by Alternative B.

As a resident of the New Castle historic district, I found nothing in the report with which I disagree. The NPS analysis and conclusions seem sound. As the report concludes, Park designation is very unlikely to cause any harm, and it will certainly bring the benefits of improved understanding and awareness as well as needed resources for preservation, enhancement, and interpretation. These benefits will be enjoyed by citizens of Delaware as well as other states. Thank you.

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13. A National Park hub or otherwise would be welcome in New Castle. As a member of City Council I voted for the Resolution in favor of the NPS locating in our City. Over a dozen citizens made the trip to the last meeting in Dover. All spoke in favor of the Park.

14. I have reviewed the report and am very much in favor of your selected alternative of a National Historical Park in Delaware. I am impressed by the amount of history related to the early European settlements as well as the beginning of our nation in the first state.

15. The Delaware Division of Historical and Cultural Affairs (HCA) enthusiastically supports the conclusion that a national park could be established in Delaware that would focus on interpreting themes of early settlement and the birth of the nation. Of the significant site alternatives presented, HCA prefers Alternative B for the following reasons:

- potential to showcase Delaware's unique role in the formation of the nation through a number of historic resources,
- potential to increase understanding of an important aspect of early European settlement,
- potential to provide assistance for resource protection to publicly and privately owned properties, and
- potential to enhance education and interpretive experiences for visitors.

Should this proposal achieve Congressional approval, the Division of Historical and Cultural Affairs looks forward to working with the National Park Service through the development of the General Management Plan and the implementation of the exciting public benefits and visitor enhancements this partnership promises.

16. As the director of the Read House and Gardens and a current resident of New Castle, I support Alternative B, for a National Historical Park. Like many others, I do not feel the option is perfect, but I do feel that it is more inclusive of Delaware's significant resources and contributions to the history of the nation.

NPS Response:

Thank you for your comments.

Comments Related to Resource Protection

A number of comments were received suggesting additional resources for consideration as a potential unit of the national park system, or additional alternatives, or comments which raised questions regarding protection of certain resources within any potential unit established under the selected alternative. Other comments suggested that the report could be strengthened by additional attention to the description of resources, particularly archeological resources.

Extracts of these comments follow:

17. The Partnership for the Delaware Estuary applauds the National Park Service for its assessment and identification of historic resources of coastal Delaware and how they could be protected and enhanced through the National Park System. However, we also urge you to reconsider the study's treatment of coastal Delaware's natural resources. We were disappointed to find that the alternatives

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advanced for consideration don't address the natural resources of coastal Delaware, which we believe were central to Senator Carper's original request for this study.

As the National Estuary Program responsible for implementing the Comprehensive Conservation Management Plan (CCMP) for the 6,827 square mile Delaware Estuary study area, the Partnership is charged to work with its current and future partners on a wide variety of tasks to sustain the Estuary's complex ecosystems by integrating management strategies that strike the proper balance among the needs of our diverse stakeholders. A National Park, Heritage Area, or Gateways Network in coastal Delaware that recognizes coastal resources as an important part of our regional and national heritage could be a great resource for implementing this and other aspects of the CCMP.

NPS Response:

Thank you for your comments. As the study report states on page 59, coastal natural resources analyzed during the study did not appear to meet criteria necessary for potential inclusion in the national park system. As discussed in the report on page 74 the potential for national heritage area designation was analyzed, there did not appear to be significant public support for such a designation or an established management entity with the capacity or demonstration of tangible local commitments required by national heritage area feasibility study criteria.

18. In addition, what is surprising is that the plan almost totally ignores the archeological sites associated with Early Settlement story. The plan mentions probable remains at Fort Christina, but remains have also been found at Fort Casimir (New Castle) and Fort Oplandt (Lewes).

A more realistic plan for a park would be to focus on Early Settlement, a story that is truly unique to Delaware. This alternative (which would be a combination of Alternatives B and C) would include Fort Christina, Old Swedes, the New Castle Historic District, and the Fort Oplandt site. Federal ownership would include Fort Christina, Fort Casimir, and the Fort Oplandt site. The NPS would form partnerships with the state and the Old Swedes' congregation, plus others, to better tell the story of Swedish, Dutch, and English settlement. Funds would be available to finally explore these archeological sites and tell their story.

NPS Response:

Thank you for your comments. The study report, in addition to referencing Fort Christina, also references potential archeological remains of Fort Casimir in New Castle on pages 44 and 45. The study team believes that the resources included in the selected alternative are sufficient to provide visitors a full understanding of the early settlement story. It also believes that Delaware's contributions to the nation during its formative stages are an important part of history. With regard to federal ownership, the study team did not discover local, private, or state interest in NPS ownership of resources. However, the study report does state on page 77, "While it is not anticipated that NPS would own resources, it would be authorized to acquire resources by donation or in fee and acquire preservation easements to ensure future protection of the park's resources if they become available from willing donors or sellers." The partnerships suggested appear to be similar to those envisioned in the selected alternative. The study team does not necessarily agree that funds would be readily available for the purposes stated in the comment. A general management plan for any potential park would need to identify such projects and detail estimated costs for regional office and Service-wide consideration.

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19. Archaeological excavations [in New Castle] have demonstrated the presence of remains dating to all periods of the community's history, from the first Dutch settlement, to the present. The Read House and Gardens property contains the intact archaeological remains of the George Read I house and yard (which his family occupied 1766-1798). The house itself had been built in the 17th century. It and the adjoining properties were owned and occupied by Robert French and Richard Halliwell in the late 17th-early 18th century. French and Halliwell were mercantile and political leaders in the early Penn era. Augustine Herman's son, Ephraim, also owned and occupied the property for a short period. Archaeological remains of all these households' material culture, landscape practices, and architecture have been encountered, tested, and documented on the property.

NPS Response:

Thank you for your comment. These resources in New Castle are within the boundary of the potential national historical park in the selected alternative. The study team is aware of archaeological investigations begun in 1994 by the University of Delaware and its more recent investigations.

20. There has never been an archeological investigation at the Fort Christina site and this is very much in order. We know where the Rocks are but exactly how the Fort was sited remains to be discovered.

NPS Response:

Thank you for your comment. Fort Christina State Park is within the boundary of the potential national historical park. The study report does not suggest that the actual site of the fort is known, but further research would enhance public understanding of these resources and the story of early settlement in Delaware.

21. One location, I feel was missed out, similar to the Zwaanandalle Museum is the Archaeology Museum in Dover, which houses collections and puts on display artifacts that deal directly with the Dutch, Swedish, and English interactions during the birth of the Nation. There are displays for the public there on this topic, and being a DHCA run facility, it would be a perfect match.

22. However, I was honestly shocked to see the Delaware Historical Society excluded from this list. As the largest and oldest institution in Delaware dedicated to the preservation and sharing of Delaware history through collections and exhibitions, I believe our resources and museums are the most comprehensive statewide source of historical information on Delaware.

23. It would seem to me that with the coming addition of the Nanticoke River display at the Seaford Museum including the arrival of Capt. John Smith to the Seaford/Woodland area in 1608, our wonderful museum and our river would be a prime downstate addition to the National Park.

NPS Responses to Comments 21, 22 and 23.

Thank you for your comments. The study provides the potential opportunity for cooperative agreements with public agencies, non-profit entities and private property owners to foster resource protection, education, and research including archaeology. A general management plan would be undertaken for the park if established by Congress. The plan would identify and outline areas of potential cooperative agreements with institutions and organizations to further the purposes of the park.

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24. There are other properties in the state that have been identified by HCA as having national significance that could have benefited from this level of analysis (e.g., Avery's Rest, Barratt's Chapel, the Severn shipwreck) and thus further support the recommendation for a national park in Delaware.

NPS Response:

Thank you for your comments. Early in the study process, the study team met with representatives of state of Delaware natural and cultural resource agencies, including HCA, and requested information on any recommended sites for investigation. These sites were not identified during that meeting or at any subsequent meetings or at public meetings where similar requests were made for the identification of resources as possible candidates for analysis. While Delaware landowner John Avery appears to be a personage of state importance, the team has not been presented with any information regarding his national significance or the national significance or NHL eligibility of Avery's Rest. Barratt's Chapel was a site listed in the report as having been investigated. As the oldest Methodist Church in the United States, built in 1780, and the cradle of U.S. Methodism, the site is of clear significance to the history of the Methodist Church in America. The resource did not appear to fit into the themes (as listed on page eight) suggested by the legislation. The Severn Shipwreck, an underwater resource ran aground during a storm (circa 1774), does not appear to be likely to meet criteria for inclusion as part of the boundary of the potential national historical park. It is a component of the transportation theme, but that theme did not demonstrate, overall, that resources related to it would meet criteria for designation. Artifacts from the Severn are on exhibit at the Zwaanandael Museum and would be available for viewing by potential park visitors.

NPS would suggest that the HCA consider whether the resources in question should be nominated for potential designation as National Historic Landmarks if HCA believes them to qualify for potential designation.

25. Right now there is a rare opportunity to preserve the entire Seventh Street Peninsula, which includes the quite wonderfully re-created *Kalmar Nyckel* tall ship. It is odd that this is not mentioned in the report. An increased footprint for the current state park of Ft. Christina could include the Kalamar Nyckel shipyard, a river walk to the Brandywine and a Visitors center. Access to this is very easy with I-495 nearby but with parking now lacking.

26. Some future consideration should be given to a multi-state Historical park for New Sweden, such as Gateway in NY and NJ. Besides Tinicum, there is the ancient Log House, the Morton Homestead, currently neglected by the Commonwealth of PA, and of course there is Swedesboro and Pennsville in NJ, all of which could be connected by the inventive use of water transportation.

27. Upon reading your recent report, unless I missed something, I don't think our concept of the historic Swedish settlement, which we believe should include the whole area of the 7th Street peninsula, has been fully explored or considered. Although we are aware that the focus is on those things that are "original", thus excluding the reproduction of the Kalmar Nyckel Ship and the New Sweden Centre's museum, we believe the shipyard and area along the Christina surrounding the rocks should be considered part of this historic zone. Just because there are no original piers or buildings remaining should not exclude this area in the plans for a National Park. Including the area can help preserve it for possible future archeological digs and expansion, and prevent it from being lost forever by continued industrial or commercial enterprise.

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28. When the study began I submitted a recommendation that the investigation committee explore the feasibility of a New National Park in Delaware which would have incorporated sites not only in Delaware but also sites in New Jersey and Pennsylvania. Although New Sweden Colony only existed as such for 17 years, the influence of these early settlers continued under Dutch rule, English rule, and played an important role in the establishment of our Nation.

NPS Responses to Comments 25, 26, 27 and 28.

Thank you for your comments. The study team tried to address these suggestions during the public meetings. The *Kalmar Nyckel* is a reproduction, not an historic original that can be determined to be of national significance. The concept of creating a representation of a historic Swedish settlement on the Seventh Street Peninsula, while perhaps having merit as a private undertaking, is not within the resource base framework currently associated with the establishment of modern day national parks. Should a park be established by Congress, a private effort to foster further understanding of Swedish settlement in the United States on the Seventh Street Peninsula would provide the basis for a complementary visitor experience. The Study team believes that the resources included in the selected alternative are sufficient to provide understanding and appreciation of the early Swedish settlement of the United States. Should a park be established by Congress, opportunities for interpretive partnerships with other Swedish settlement resources would be potentially considered.

29. The portion about the Green in Dover, should emphasis the Old State House as a main location, being directly related to the birth of the nation, and again another DHCA property.

30. The inclusion of Stonum in this group of NHLs is problematic, since George Read (I) is known to have NOT resided at this house. His house was instead on the Strand in New Castle, directly next to the present George Read (II) house. The ARCHEOLOGICAL remains of George Read (I)'s house have been identified and documented by a multi-year investigation undertaken by the University of Delaware and the Delaware Historical Society. These resources, in my opinion, are the true location of Read's house, and should be part of the un-related NHL nomination currently being reviewed by the NPS for the George Read (II) property. They should also take precedence over Stonum, which was a tenant property at best. The fact that it is "most significant structure" extant (mentioned on page 53) should not be the only reason that it is an NHL or included in this the proposed National Park Unit.

31. THUS with so much to offer from New Sweden I am sure that ALTERNATIVE THREE would respond more nearly to the need for National recognition. New Castle is also worthy of federal landmarking but can take care of itself as it has been able to do very well for many years.

NPS Responses to Comments 29, 30 and 31.

Thank you for your comments. The Old State House may be viewed as a potential related site, but is not projected to be within the boundary of any potential national historical park. Both Stonum and the original George Read I house site are suggested for inclusion in the boundary, as is the George Read II house. With regard to comment 31, the study team believes the resources within the potential park boundary of the selected alternative permit a wider understanding of early settlement and Delaware's role in the birth of the nation.

32. Additional discussion and clarification by the NPS of the potential need for future cultural resource surveys and consultation with the Delaware State Historic Preservation Office (SHPO) under

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Section 106 of the National Historic Preservation Act. In the implementation of Alternative B, HCA anticipates the construction of a connector between the Court House and the Sheriff's House to provide ADA accessibility. That and possibly other activities in Alternative B or C have the potential for effects to historic properties. There will be need to follow the established Section 106 procedures at such times.

NPS Response:

Thank you for your comments: The Finding of No Significant Impact contemplates a programmatic agreement being entered into between the NPS and the Delaware SHPO should a park be established by Congress regarding any activities requiring Section 106 consultation and compliance. NPS is also bound to follow the Secretary of the Interior's Standards for Historic Structures in any modification, alteration or rehabilitation of such historic resources. As stated on page five of the report, the purpose of this study was solely to determine if resources in Delaware met criteria for potential designation as a unit of the national park system. It does not detail specific actions that may proceed in the future. That task is left to a park general management plan should a park be established by Congress. It is the general management plan that will determine the scale and impacts of any development associated with the park, the manner and purpose for which any grants may be used, necessary visitor facilities, access and transportation needs, as well as park themes and potential visitor experiences. As stated in the report and the FONSI the NPS is committed to ongoing consultation with the SHPO for any future planning should a park be established by Congress.

33. Because of the fragility of early settlement resources, such places are often commemorated as archeological or memorial sites. Sites in the National Park System include: St. Croix Island IHS, De Soto National Memorial, Fort Caroline National Memorial, and Fort Frederica National Monument, and Jamestown at Colonial National Historical Park. A Delaware Settlement National Historical Park would be in pretty good company. My proposal would include archeological sites, but also the brick and mortar sites of New Castle.

NPS Response:

Thank you for your comments. The selected alternative includes within its suggested boundary both brick and mortar and archeological sites of resources associated with early settlement sites. The study team believes these resources are sufficient to provide public understanding of the early settlement of Delaware by Dutch, Swedish and English.

Comments Related to Interpretation and Visitor Experiences

34. Alternative B allows for the broadest range of experiences for potential park visitors. Should those visitors elect to start out at the "hub" – that is a visitor center located in Historic New Castle – their first impressions will be most positive. The City, of course, is steeped in the history which is the focus of the park as identified by the NPS, "...to preserve and interpret resources associated with early Dutch, Swedish and English settlement, as well as Delaware's role in the birth of the nation and becoming the first state."

35. There needs to be more detail about the relationship between the Dutch, Swedish, and English and nation building in DE as it relates to their interactions with native populations, which is nationally

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significant and has not been told in other parks and is significant only to DE, I'm getting to some of the work by Cara Blume and Ned Heite and the selling and renting of land by the Swedish and Dutch with the Native Populations, as well as their interactions when it came to them versus the English and dividing up the land, and trading during the 17th and early 18th centuries in DE specifically around Old New Castle, Dover, and Lewes.

36. Incorporation of indigenous and immigrant history into themes. I would argue for a more balanced, integrated presentation of the indigenous-European-African interactions in Delaware. The presentation on the native people in "European Contact" (p. 20) is simplistic and stereotypical. The bibliography does not include any of the archaeological scholarship on Delaware's indigenous populations (e.g., work by Custer, Blume, Becker, Grumet), nor does it reference any of the extensive DelDOT archaeology reports that form the foundation of modern archaeology of native Delaware. Moreover, if the overwhelming emphasis on the political narrative of early colonial multinationalism in the Delaware Valley (Ch. 2) represents the proposed park storyline, it does little to account for the contests and accommodations among native, immigrants, and forced migrants that characterized the 'middle ground' of the Middle Atlantic. The National Park Service has a prime opportunity to challenge hagiographic portrayals of early colonization and nation-making in this proposed park in provocative and productive ways. This report does not suggest such a goal.

37. Upon review of the alternatives suggested and their analysis, HCA recommends expanding the interpretation of first settlement to include African American and Native American populations that were in Delaware during the period of colonization. This may be noted in Chapter Four – Alternative B: National Historical Park – this section could be amended as follows: The purpose of the park would be to preserve and interpret resources associated with early Dutch, Swedish, and English settlement, including Native American and African American perspectives, as well as Delaware's role in the birth of the nation. By amending the purpose statement, historic and significant sites in Kent and Sussex counties can more adequately support the proposed park (as related sites).

38. Only in New Sweden was there a good relationship with the Lenape native people. The relationship with the Indians and the English and Dutch was despicable. There are many reasons for this but none were noticed in the report. In a country that is more disparate than ever, this successful pluralism would seem to have educational worth.

39. I will admit to some trepidation about the continuing emphasis on the Colonial and early Federal period of New Castle's history, and the lauding of New Castle's early structures to the exclusion of others. Because of this emphasis, in the mid 20th century some authentic Victorian buildings in town had their facades stripped so the structures could be remade in Federal-era masks, and other Victorian structures were demolished, leaving disturbing gaps in the historic streetscape, since replaced by anomalous mini-parks. I hope it can be accomplished with an awareness that the town had a life after 1800, and a conscious effort by the National Park Service to acknowledge, respect, and interpret the town's ongoing story in its programs and educational efforts.

40. I think that the entire report gravely short-changes the Swedish settlement possibilities. It is misleading to let the impression stand that the Swedes and Finns only were important from 1638-1655. After the Dutch capture, the Swedes were given their own self-rule at the Upland Court and Swedish was the Lingua Franca of the Delaware Valley until 1681. The remaining Dutch, Finns, and some English all had to speak Swedish to get along. There are at least 20 million descendants of these people today.

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41. There was limited discussion of known historic period archaeological sites. The George Read House site on the Strand in New Castle is in the NHL District and has potential for interpretation under the proposed themes.

NPS Response to Comments 34 through 41

Thank you for your comments. The special resource study does not determine the actual themes that will be presented should Congress establish a unit of the national park system in Delaware. Park themes are developed through the general management planning process based on the congressionally established purpose of the park and its significance. Subsequent to the development of a general management plan, comprehensive and long range interpretive plans are also conducted. The special resource study was simply analyzing whether resources related to the theme categories set forth in the legislation met congressional criteria for designation of a unit of the national park system. Should a park be established, the study team would encourage those who commented to participate in the planning process as it unfolds.

42. I further believe the major interpretive center for such a park should be located within the City of Wilmington, specifically at the Christina Community Center of Old Swedes. Wilmington's advantages and amenities are in place and far outweigh those in place or being planned for the New Castle NHL District. The Christina Community Center in Wilmington offers:

- easy access to the interstate highway system
- existing parking for automobiles and/or tour buses
- convenient rail travel for both Amtrak and SEPTA
- serviced by DART bus service along Church Street
- abundance of hotel accommodations for families or large groups
- numerous restaurant choices ranging from fine dining to quick meals, and
- closely conforms to the theme of "colonization and establishment of the frontier"

43. The City of Wilmington's amenities and advantages far out-weigh those of New Castle. A variety of transportation systems already serve the city. There are established restaurants and hotels.

44. Christiana Community Center at Old Swedes is in close proximity to other cultural institutions. We hope that the study team will consider this alternative to the "hub" as they finalize the resource study report.

45. While I agree with the NPS preferred alternative in general, I differ with the study team in one important aspect: I recommend that the interpretive hub should be in Wilmington, with a satellite location in Old New Castle. Wilmington's convenience for all modes of transportation, our hotel accommodations, restaurants, nearby historic and cultural sites, and accommodating street system speak to our superior suitability for a visitation hub. I sincerely hope that our amenities will be taken into consideration by the study team as they perform the necessary feasibility evaluations in the management study to come.

46. As a New Castle resident and Executive Director of the New Castle Historical Society, I want to express my support for Historic New Castle as the location for a National Park visitor center and office.

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47. Historic New Castle is centrally located along major travel routes including I-95/295/495, US Route 13, and Delaware Route 1. With tourism infrastructure already in place, and with the State's Division of Historical and Cultural Affairs and organizations like the Delaware Historical Society and New Castle Historical Society already involved in preserving and interpreting the town's history for thousands of visitors every year, Historic New Castle is the best choice for a National Park Service visitor center and office.

NPS Response to Comments 42 through 47

Thank you for your comments. The special resource study references the fact that local interests have suggested that the Sheriff's House at the New Castle Court House and the community center at Holy Trinity (Old Swedes') Church would be suitable for NPS use as administrative/visitor services facilities. The study is quite purposeful in using the phrase "could be used" for these purposes. The study does not attempt to be pre-decisional in where future administrative/visitor facilities should be located. Such facilities would require agreements with owners and further assessments regarding such factors as costs of renovations, compliance implications, etc. Should Congress establish a unit of the national park system in Delaware, a park general management plan will determine the appropriate locations for administrative and visitor service facilities. The two mentioned in the special resource study will, of course, be further explored to determine if they are available and suitable for the purposes that the general management plan may envision.

Comments Related to Funding and Management of the Potential Park

A number of comments were received regarding concerns on potential funding, the impact of a potential park on residents' properties, and the addition of resources in the future.

48. Real national parks involve NPS ownership - What commitment in terms of funding can the State of Delaware expect from the Park Service if the NPS has no ownership responsibility? (Probably very little.)

Real national parks are managed to NPS standards. The public has come to expect a certain standard at NPS sites. The role of the NPS in this plan will be limited to interpretation and planning. No real management improvement in the sites in questions can be expected under the current proposal. The NPS has a similar interpretive role at Oklahoma City National Memorial, an Affiliated Area.

Real national parks are base-funded by the federal government. The plan calls for grants and matches that may or may not come. Cedar Creek & Belle Grove NHP in the Shenandoah was established with the promise of grants to partners. Few have been forthcoming because the grants have to be appropriated by Congress.

NPS Response:

Thank you for your comments. Please see response to comment #18 with regard to potential ownership of resources by the NPS. The special resource study does not envision the NPS role to be limited to interpretation and planning. On the contrary, the study team has included a provision that if resource protection assistance cannot be provided from another nearby unit that a staff position be devoted to that task. The study team does not understand the relationship between ownership and potential funding for Delaware. It would appear that

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direct NPS ownership would negate the need for any financial assistance to the state. The comment is correct in stating that all units of the national park system receive base funding and the study team has no reason to conclude that a unit established under the selected alternative would be excluded from the base funding accorded all units of the national park system. Future funding for grants, as is the case with all grants would be dependent on congressional appropriations. With regard to Cedar Creek and Belle Grove National Historical Park, the park is nearing completion of its general management plan which calls for strong resource protection and interpretive relationships with its partners including both NPS and partner acquisition of significant acreage to protect the park's resources. Partners have already recently purchased lands to promote increased resource protection using, in part, federal financial assistance for the acquisitions.

49. That legislation authorizing the park be written in such a way to enable future NHL sites that relate to the themes to be included within the park.

NPS Response:

Thank you for your comment. Should legislation be introduced to establish a unit of the national park system in Delaware, it would be up to the sponsor(s) of the legislation to include such a provision. Once parks are established, boundary adjustment studies may be undertaken to include important resources related to the park's purpose and significance. Once a boundary study has been completed, congressional authorization is necessary to implement the adjustment.

50. Discussion of future endeavors for the proposed management partnership of HCA-owned properties, of the cost sharing relationship, of the education and programming partnership and visitor services responsibilities. HCA anticipates that these and other related partnership activities will be developed in detail in consultation with HCA through a Memorandum of Agreement and/or in the course of developing the General Management Plan for the park.

NPS Response:

HCA is correct that formal agreements will be necessary to define the full range of roles and relationships of the partners. It is likely that these agreements, along with those affecting other properties and relationships will be the subject of the general management planning process should a unit be established by Congress. As previously noted, the NPS is committed to ongoing consultation with HCA, should a unit be established by Congress.

51. The University of Delaware has undergraduate and/or graduate program and faculty expertise in archaeology, anthropology, art conservation, American history, museum studies, historic preservation, material culture studies, and service learning. The proposed National Historical Park would provide outstanding opportunities for cooperative projects and support expansion of already well-established relationships between the University and the community.

NPS Response:

The study team has assumed that if legislation is introduced to establish a unit of the national park system in Delaware that the NPS would be authorized to enter into cooperative agreements with, among others, educational institutions for research related to the park's

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purpose and significance. NPS units have many active and productive partnerships with academic institutions.

52. On page 70, the report states that many of the NHL sites are managed by the state and would continue to be managed primarily by the Delaware Division of Historic and Cultural Affairs? Given budget, personnel, and experienced know how, can the same Division even keep up with this demand? Where is the documentation to solidify this? Many properties currently owned and operated by the Division aren't even open or managed on a regular basis? Not to sound negative, but what makes them think they can do it now?

It is foreseeable that NPS staff would be mostly operating and maintaining them, given current and future conditions.

In Chapter 4, not to sound negative, but what happens when the matching grants can not match with the NPS assistance? The NPS has documented as providing a matching cap of 5M. However, what happens when true costs are determined with renovations and other secondary accommodations and the State, New Castle, or private partners involved fall short of their share?

NPS Response:

Thank you for your comments. Should a park be congressionally established, the NPS and the Delaware Division of Historic and Cultural Affairs will enter into appropriate agreements to ensure that resources are available for public visitation and the respective roles and responsibilities of both agencies. The amount of matching grant funding estimated by the study team is considered modest and corresponding matching funds are believed to be achievable over time. Legislation can provide that matching shares be in the form of both dollars and in-kind services. Many parks also have donated resources that financially assist in carrying out the purposes of the park whether through friends groups or other donor sources. Some improvements, particularly visitor service facilities may be eligible for funding through other federal funding programs such as those involving transportation related grants. The study team is confident that the selected alternative constitutes a financially feasible relationship.

53. In determining and confirming the NHL locations, was the American with Disabilities Act or State Fire Marshal contacted to determine the full use and feasibility of existing facilities? It is apparent that Fort Christiana (owned by the Division of Historic and Cultural Affairs) is not open to the public. So what happens when this facility is re-opened for the public? What about a new administrative/visitor center know as the Sheriff's House? Many codes and visitor capacity are out of compliance (or private) that will warrant significant upgrades. What about Old New Castle and Holy Trinity which are primarily privately operated and managed? What about surrounding walkable area? Are all places fully accessible for educational and viewing needs? There has to be some limitations? Are they now viable? The future contact/visitor stations (as suggested) will have many associated and secondary impacts beyond further Section 106 compliance needs. Again, this overall factor was not documented in the report.

NPS Response:

Thank you for your comments. Many aspects of a new park will need to be analyzed should the park be established by Congress. This is the purpose of a general management plan - to identify and resolve issues affecting the park and to determine appropriate visitor capacities and impacts, as well as issues that must be resolved to promote a viable visitor experience. As

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indicated in the response to comments #42 through 47, the study does not indicate that visitor service facilities will be located at the sites referenced in the comment. Further review of potential locations for visitor services will be required under the general management plan for the potential park.

54. I am a resident of the City of New Castle, Delaware. I have been encouraged to offer my thoughts about the National Park Service proposed headquartering in our town.

On the surfaces, it seems and sounds like a positive situation for the City of New Castle. However, as I think about the current and historically on-going issues plaguing the City of New Castle; I have reservations. I have listed my reservations as bullet points for ease of review, but I also listed a brief explanation.

- NPS offices in downtown New Castle will compound the ongoing traffic nightmares faced by every resident.
- Having a NPS office in downtown New Castle can only add to the parking problems, issues and concerns expressed by our residents over the years.
- The anticipated increase in visitors would adversely impact our quality of life.
- As a resident, I would not want the NPS to have input or control over homeowners maintaining their properties.
- The increase of tour buses cannot be supported by our current street surfaces.
- We currently have one tour bus drop-off. The City cannot even get the limited number of buses that we tolerate to abide by the rules.
- Well maintain public bathroom facilities would have to be upgraded and then well maintained.

I hope my thoughts are considered as you move forward.

NPS Response:

Thank you for your comments. As indicated in the response to comments # 42 through 47, the location of any park headquarters will be further analyzed in a general management plan, as well as visitor capacities and impacts, transportation access and parking, and adequate visitor service facilities. The only significant regulatory impact on uses of property in the New Castle Historic District would come if federal grants were used by property owners for property improvements or restoration. These would require adherence to the Secretary of the Interior's Standards for the Treatment of Historic Structures. Such requirements would be no different than if properties in the National Historic Landmark District used federal funds for the same purposes today. Should the potential park be established by Congress, NPS will welcome the participation of local government officials and property owners in New Castle in the general management planning process. The study team during its own public process took note of the fact that the establishment of a potential national historical park in New Castle should not detract from the residential atmosphere of the National Historic Landmark District. The study team believes that a general management plan sensitive to these issues can be achieved with the active participation of the community.

Comments Relating to Consultation and Coordination

A number of comments received pointed out deficiencies in the consultation and coordination process relating to inadvertent omissions of early tribal consultation. The study team has attempted to correct

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these deficiencies, but offers its apologies particularly to the Delaware Nation and the Stockbridge-Muncie. Representatives of Stockbridge-Munsee have indicated that they do not have concerns with the selected alternative. The President of the Delaware Nation has expressed support for the project in spite of concerns over lack of early coordination.

55. Please find attached my letter of response concerning the Delaware National Coastal Special Resource Study and Environmental Assessment. I do expect to find this letter attached to the Appendices of the report going to Congress as well. Although my letter may be directed at the late or non-existent communications, the Delaware Nation does support the study/project being proposed. The Delaware Nation is just at a loss of how we repeatedly find ourselves at the tail end of a project, which usually results in apologies for not involving us in the first place. While I am sure there is enough blame to go around in this cyclic situation, assist me in reaching those that can facilitate an improved relationship between the Delaware Nation & National Park Services so we can better serve.

I will be in the Northeast Region January 12 -21, 2009 and request an appointment to discuss how the Delaware Nation can get in the communication loop with the National Park Service. I look forward to visiting on this subject as well as seeing this project first hand, until then have a Happy & Safe New Year.

56. I have been forwarded a copy of your letter dated December 10, 2008 notifying & allowing the Delaware Nation the opportunity to review your report *Delaware National Coastal Special Study and Environmental Assessment*. After a thorough "review" of your online report, I now have a complete understanding of this project and the report. However, I have numerous concerns with both the report and the project. The recurring omission of required consultation is distressing. This past February, I deliberated with the NPS on the lack of consultation and it was understood that it is your agencies responsibility to initiate the consultation process with a Sovereign Tribal Nation before and throughout any project/study that necessitates formal consultation. These present inactions defy the

- National Historic Preservation Act
- Native American Graves Protection and Repatriation Act
- Executive Order 13175
- National Park Service Management Policies 2006, Section 1.11, Relationship with American Indian Tribes which specifically states "*that government-to-government consultation should begin at the earliest possible stages of planning.*"

Furthermore, the Delaware Nation may have had input and comments to offer for this project that are religiously and/or culturally notable. The historical resources under consideration are apparently tribally significant and could even contain further historical importance as noted in your own research, i.e: Hopokahacking, Pagahacking. Even the first mandated theme in the proposed study is suggestive of consultation with the appropriate Native American Government. "*SEC. 603. THEMES (1) the history of indigenous peoples, which would explore the history of Native American tribes of Delaware, such as the Nanticoke and Lenni Lenape.*"

As your letter is just reaching us on this date of the December 15th public meeting, at least you are accepting comments until December 31, 2008. Even inviting us to comment through the website, but presently the website is not taking comments. I therefore have no relief other than to write and give comments that reflect your communicative failures. Our omission from consultation and involvement is not only a detriment to our supposed government-to-government relationship, but to this significant historical project sought by Congress through Public Law 109-338.

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Respectfully,

Kerry Holton
President
Delaware Nation

NPS Response:

Thank you for your comments. The study team again apologizes for not contacting the Delaware Nation earlier in the study and fully appreciates the concerns expressed. The Northeast Region will contact President Holton with regard to the requested meeting.

57. Additionally, the report indicates that the SHPO was notified of NPS' intention of using this document for compliance with Section 106 (page 93). No formal communication specifying this intention has been received.

NPS Response:

Thank you for your comment. The Delaware SHPO was sent the standard special resource study consultation letter dated April 10, 2008 which is contained in the study report appendices.

Comments Related to the Environmental Assessment

A number of comments were directed at the adequacy of the impact assessment associated with this special resource study. Excerpts are:

58. There is no section for air and noise quality in the EA, which need to be addressed for increased vehicular traffic due to a new park designation. P. 97 - While across the state the increase in traffic may be "negligible." at individual sites such as Old Swedes and The New Castle Courthouse I can imagine at least a "minor" impact considering the nature of the adjacent streets. This might be true at other sites as well (Can buses actually negotiate the loop in front of the statehouse when cars are parked there?

59. Page 86 Why are we concluding that "Alternative B would have no impacts on transportation impacts since the increase in the number of vehicles traveling to the sites would not be measurable." Whose conclusion is this? Under what information? What about increased VMT and air pollution since the study intends that folks are traveling to each site on their own which are considerable miles apart. Is this study suggesting that visitation to each site NHL would not increase anymore then current conditions? What planning or travel demand model concluded this? The NPS has to have visitor studies and projections? Any such studies or a general statement should be included.

Page 90 The Transportation assessment was pretty general. What about pedestrian safety and bicycle use? Are the areas safe to walk and park about from outside and within each facility? What about evening/dusk conditions or sudden rainstorms? What about security within or outside the facilities since we are dealing with tourists? Wilmington (around the NHL's) is not a particular safe place as crime factors were not indicated nor factored.

Page 96 and 97, Visitor Use Transportation: Who made the conclusion that there would be no changes in levels of service? What correspondence is there from DelDOT? This section only

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focused on the vehicle use. What about parking (particularly bus) and pedestrian safety? This matter raises question on the level of study documented.

60. There is no section for air and noise quality in the EA, which need to be addressed for increased vehicular traffic due to a new park designation.

61. Under the Cultural Resources affected, the document does, not define how and why no Archaeological resources will be affected to get to a FONSI, there needs to be at least a data matrix / table of current Archaeological sites associated with the areas to be interpreted in Dover, Old New Castle, and places in Wilmington and Lewes, and how interpreting these areas / structures will have no affect on known Archaeological sits associated with these areas, and potential impacts due to a National Park, aka increased traffic, parking lots, etc...

62. Also on page 15, it is stated that "no known archeological resources would be impacted within the area of potential effects." How was the area of potential effects (APE) defined? Further, this statement is incorrect, since archeological resources have been identified around the New Castle Court House. This work was undertaken by the Division of Historical and Cultural Affairs. It should be acknowledged in this section, mentioned later in the discussion of the Court House as a contributing resource for the NPS unit, and it should be noted as a possible impacted resource if ground disturbance is to occur around the Sheriff's House.

63. It is implied that this report is intended to serve as an Environmental Assessment (EA) under the National Environmental Policy Act (NEPA) (page 7). However, neither the consultation nor the documentation follows a typical format (e.g., state and federal environmental agencies see a draft of the EA before it goes public). HCA requests that the NPS clarify how this document meets the requirements under NEPA.

64. I question whether this document really meets the requirements of an EA under NEPA and the intersection of NEPA and the Section 106 Process. Some of these questions were raised at the December 15 public meeting, but were not, in my opinion, adequately addressed or explained. Those raising the questions are professionals well-versed in the process, so their treatment at the meeting was somewhat disturbing to me. Under the proposed Alternative B there will be some physical changes to resources, such as the construction work proposed at the Sheriff's House. Further, how will parking be treated at any of the non-urban locations (Stonum, Lombardy Hall)? What are the projected visitation numbers that the NPS proposes will be generated if the preferred alternative is selected? Surely the NPS has numbers for visitation, likely economic impacts, etc. I did not see these stated in the draft study.

65. One thing the study does not assess is the infrastructure that needs to be upgraded or enhanced with NPS recognition. The study simply suggests that this important and essential factor will be determined later in a management and operational program. Thus, future impacts needed and associated to upgrade transportation, access, parking, signage, and most of all, compliance with the American with Disabilities Act were simply ignored in any discussion of the study. The National Park Service has been totally naive in not evening mentioning or even suggesting this critical factor that is essential as a public agency and partner. At a minimal the future impacts and associated needs to enhance park experience and education should be mentioned to a limited degree.

NPS Response:

Thank you for your comments. The environmental assessment for the special resource study is similar to other assessments conducted by NPS for the same purpose. The purpose

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statement for the study and the environmental assessment clearly defines the study as one authorized by Congress to determine if resources in the study area meet congressional criteria for designation as a unit of the national park system. The study necessarily does not contain extensive information about potential impacts of these findings, since actual programs and activities conducted by a potential park and any ensuing impacts are beyond the knowledge base of the study team or any other party in making the congressionally required findings. The study is simply that, information collected and analyzed to reach a series of findings, and to provide management alternatives for public review and a general assessment of their impacts, not a plan for the actual development and operation of a park.

The general nature of the impact analysis presented in the study and the environmental assessment is reasonable and appropriate, given that the outcome of the study and environmental assessment is limited to the potential for congressional legislative action designating a unit of the national park system and setting forth the boundaries and authorities of the park. Should a park be established in Delaware, a much more detailed analysis of potential NPS actions and impacts would be conducted in the form of a general management plan. It is this document that provides the detailed basis for determining actual development activities and development intensities, any potential archeological investigations and treatments, park themes and visitor services and experiences, particular operational procedures, agreements and initiatives, permitted uses of grants, transportation and access requirements including opportunities for alternative transportation systems, and actual operational and capital costs requirements. Impacts of that general management plan will be assessed in the appropriate level of detail in accordance with NEPA requirements. The plan will also need to fully comply with the provisions of Section 106 of the National Historic Preservation Act. Information gathered during the course of this study and in preparation for the study report and environmental assessment was only of the level of detail appropriate for the findings requested by Congress. It did not and should not have gone beyond the level of detail necessary for that specific task.

Comments Opposed to the Establishment of a Potential Unit

66. Delaware does not need a National Park simply for the sake of having one. Along with the benefits of National Park status come just as many incumbrances. It is apparent that this is an attempt by the state of Delaware to boost tourism and not in the best interest of the land itself.

67. In any case, I hope that a design for a more robust park can be crafted. As much as I'd like to see an NPS site in Delaware, I would rather there be no park rather than the token park that is offered in the proposal.

NPS Response:

Thank you for your comments.

Additional Comments Related to Study Report Content and Suggested Corrections

A number of comments received expressed concerns that the information in the study report could be improved, particularly with the areas of more up-to-date research. Comments also provided information to correct dates or requesting changes in the portrayal of historical events in the study.

68. A much more inclusive reference section (called a bibliography on page 126-127) is really needed for this document. The sources cited are very spotty. It seems from the text like the authors (whoever they were) did rely on other sources, but these are not referenced. The use of the NHL nomination forms is cited, but these too should be included in the reference section, and not buried in a footnote section (page 54). For example, only one archeological study is cited in the bibliography; John Munroe's History of Delaware is cited, but not his Colonial Delaware History (a much more appropriate book for this study, since it focuses on the state's seventeenth and eighteenth centuries); and numerous readily-available and appropriate articles in Delaware History, the publication of the Historical Society, are not included. Since the definition of a bibliography is a section that includes all of the relevant sources, I suggest you change the title of this section to references, since it will clearly not include all relevant sources that are applicable.

69. The historical research section of this document is poorly-researched and written. Care should be taken to review and correct erroneous historical dates. For example, on page 28 it is stated that Peter Stuyvesant became Director General in 1667, but this is out of chronology with earlier and later paragraphs, and does not match what is presented in the timeline (Appendix A). Please review and revise all of the dates used in this document to ensure historical accuracy.

As with the issue of Native Americans mentioned above, a large body of recent scholarship is readily available regarding the history of the colonial and early national periods of Delaware history. This document does not even attempt to provide the reader with an accurate depiction of Delaware history. I fully understand that this is a "big picture" overview and not a detailed history, however, you must have a firm grasp on the details before you can reach the big picture.

Accuracy of facts in this draft document is a concern. For example, the paragraphs (pages 40-41) devoted to the American Revolution and the Battle of Cooch's Bridge are inaccurate and should be rewritten. The American forces at the bridge were not militia (page 40), nor were there only 720 of them. This force was composed of Continentals and militia. The battle was fought on September 3 (correctly noted in the first paragraph of the section on page 40, but erroneously noted as beginning on August 30 in the third paragraph of the section on the same page). The statement on page 41 that 100 handpicked marksmen laid an ambush is not accurate. The American formation was much larger than that, made up of Continental soldiers from North Carolina, Pennsylvania, Virginia, and New Jersey, as well as New Castle County and Pennsylvania militia. The statement that this was a skirmish (page 40) is being challenged by contemporary writers, men who were present at the engagement. These statements are coming from diaries, letters, and pension records.

The paragraph coming at the end of the Revolutionary War discussion (page 41) outlining the history of the Delaware Regiment seems out of place. The role the regiment played throughout the war has been well-documented by Christopher Ward (The Delaware Continentals not cited in the references), but the paragraph does not mention the full range of service of the unit, which served throughout the war. It is unclear to me why the regiment is mentioned at all.

70. There appears to be reliance on sources that may be outdated. For example, the John Dickinson Plantation architectural history has been much studied over time and the dating of the construction sequence has been considerably changed.

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- There is a general absence of footnoting and citation of sources.
- The section on prehistory is overly generic and lacks discussion of sites known to be in the Study Area (such as the National Register-listed Townsend Site).
- The reference to the Old Dutch House is incorrect. The house is not an example of Dutch architecture.

71. The histories were fun to read and well written...neat pictures too. Perhaps this perpetuates all that is wrong with our field and govt.cultural resource managers. Who pulled this together...educated wasps who retell the stories they were trained to tell and like to hear and what we had in grade school about the rich, famous and influential-a mere speck of the total population, and paints away all else and misses the deep, and incredibly rich diversity and tapestry that made and makes Delaware all that it is.

Where's the jazz, the fun, the colors, the rock and roll, the walks on the wild side. The creativity, the imagination, the innovation? Was everyone the same, plain and dominant.

The obligatory cook book approach, all the while humanity screams out how so different it all has been, is and should be told. I just think that we all have come so far on our DE work, yet by those "in charge" it's invisible. It is and has been a new day out there.

72. The section on the Contact Period would have benefited from discussion of tribes known to have been within what is now the state of Delaware and the acknowledgement that descendants of these tribes remain in the area.

73. Comments and publicity about this draft report, to date, have pointed to the need to address the important which the City of Lewes played during the time period of the study focus. We encourage the National Park Service to address these issues and ensure that the themes addressed by the proposed park, likewise, include the resources in Lewes which support these themes.

NPS Response:

Thank you for your comments. Chapter 2 of the study report indicates that that it is not intended to be a detailed analysis of historic places, people or events in Delaware. Rather the history presented is simply to provide the background for the findings of significance of the themes of early settlement and Delaware's role in the birth of the nation. The study team recognizes that there is much additional information related to the history of Delaware and these specific thematic topics. The study team believes that the sources used during the study were sufficient to enable the required findings of the study to be reached. Should a park be established by Congress in Delaware, there will be many opportunities for historians and others to contribute to the park and the public's knowledge of Delaware's history. During the general management planning process, the NPS often convenes history round tables to ensure that park interpretations of history are based on current research.

With regard to resources in Lewes, NPS did not discover resources that would lead to inclusion in the potential park boundary, but does reference related resources that the park may lead tours to or otherwise involve in potential park activities. These resources are most appropriately identified in a park general management plan. The study team must state, however, that during its meetings in Delaware, a number of people and organizations set forth the position that any national park in Delaware should include resources in all three counties of the state. The nature of special resource studies is that decisions on resources that should be included in any potential unit are related to whether the resources meet congressional

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criteria for potential unit designation, not that they are geographically distributed to include specific governmental jurisdictions.

With regard to corrections offered in the public comments, many are reflected in the attached errata sheet which becomes a part of the study report. The errata sheet is being mailed to those previously mailed copies of the report including local libraries.

Errata sheet

Page 7 – last paragraph, third line – “created by Route 13” should read “created by Route 13 north of Dover, and Route 113 south of Dover”

Page 12 – second column, second paragraph, first line - “there are 530 sites” should say “there are 657 sites”

Page 15 – column two, paragraph 3, line one - “Although archeological testing has not been conducted...” should read “Although archeological testing has not been conducted for this study...”

Page 28 – column one, paragraph two, first sentence - “In the spring of 1667...” should read “In the spring of 1647...”

Page 40 – Column two, fifth paragraph, first line, - remove “The militia which had 720...” then begin sentence with “Troops in the region...”

Page 40 – Column two, sixth paragraph - “August 30th” should say “September 3rd”, remove the sentence “The militia used guerilla tactics learned from the Indians.”

Page 45 – Column two, second paragraph, first sentence - “...1797-1801...” should read “...1797 -1804...”

Page 67 – first column, third paragraph, fifth line – “Fort Christina” should say “Fort Christina State Park.”

Page 53 - second paragraph, second line – “Lombardy Hall Foundation” should say “Granite Masonic Hall Company.”

Page 89 - second column, last paragraph, line six – “Lombardy Hall Foundation” should say “Granite Masonic Hall Company”

Page 89 – first column, second paragraph, line six and seven - “first state ratifying the Declaration” should say “first state ratifying the Constitution”.

Page 90 – first column, second paragraph, line eight – “a 2006 population of 47,601 persons” should read “a 2006 population of 147,601 persons”