

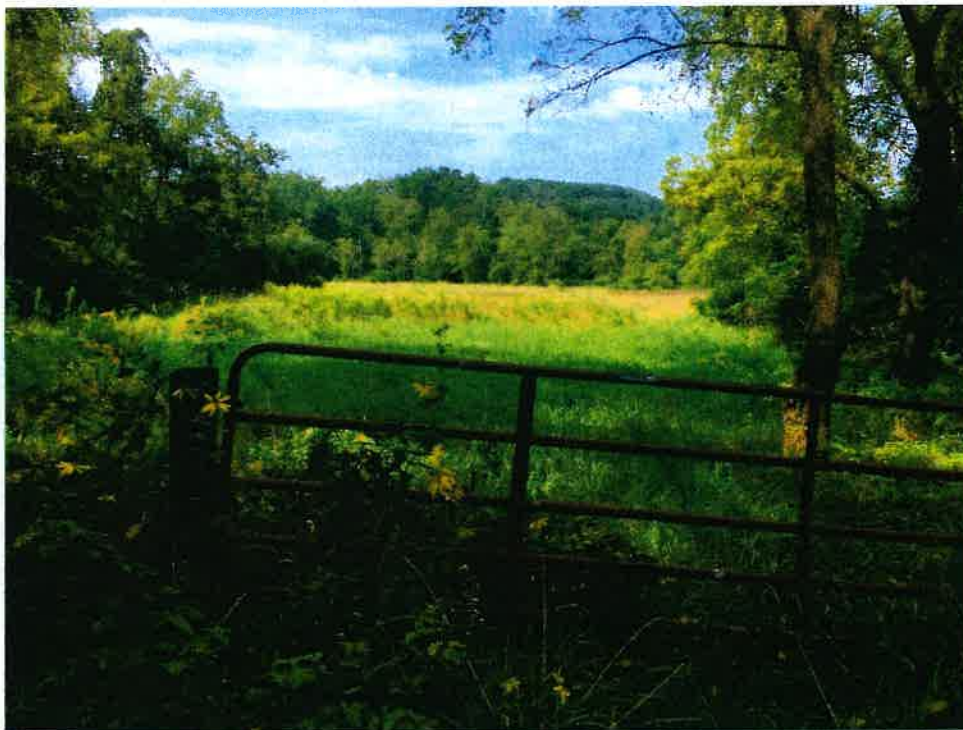
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# Environmental Assessment

Strawbridge 2 – White Clay Creek Preserve Addition (Replacement Property) for Multiple Land and Water Conservation Fund Conversions throughout Pennsylvania  
Elk, Franklin and New London Townships, Chester County, PA

*Acquisition of a replacement property to resolve two transportation project conversions of land subject to Section 6(f)(3) of the Land and Water Conservation Fund Act and various other conversions throughout Pennsylvania as noted on the Recreational Usefulness and Excess Value Table.*



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## 1. INTRODUCTION

The Land and Water Conservation Fund Act ("the Act") (Public Law 88-578; currently codified at 54 U.S.C. §200304 et seq.) aims to expand and protect a public recreation estate from backyard to backcountry for the health and vitality of the American people and our visitors. The Land and Water Conservation Fund ("LWCF") grant program is administered by the National Park Service ("NPS") in cooperation with a Governor designated agency for each state and territory, and provides matching grants for the acquisition, development, or renovation of tribal, state, and local outdoor recreation properties. In accepting grant funding, applicants commit to managing funded properties for public outdoor recreation purposes in perpetuity, or to provide replacement property to which their LWCF responsibilities can be converted (36 C.F.R. 59).

The Pennsylvania Department of Conservation and Natural Resources ("DCNR") is proposing to acquire a 982.6-acre property (see location map in Appendix A), referred to as the Strawbridge 2 – White Clay Creek Preserve Addition ("Replacement Property"), in Chester County to use as replacement for multiple LWCF conversions throughout Pennsylvania. In order for property to be accepted as conversion replacement, it must demonstrate equivalent fair market value, recreational usefulness, and location as that which it is replacing.

The Strawbridge 2 Replacement Property was appraised at more than 13 million dollars (see appraisal in Appendix B) and will, therefore, adequately provide more than enough value for the conversions being bundled. The conversions being bundled for use at the Replacement Property were chosen because of the equivalent recreational usefulness that the Replacement Property will provide. As a statewide provider, DCNR may consider replacement property anywhere in Pennsylvania.

The Replacement Property will be added to the Commonwealth's 2,073-acre White Clay Creek Preserve (Big Elk Creek Section) and will be maintained by the DCNR Bureau of State Parks. It will provide passive recreation such as hiking, hunting, fishing and wildlife watching. The White Clay Creek Preserve is adjacent to the 5,300-acre Fair Hill Natural Resource Management Area in Maryland. The Replacement Property is also 3.5 miles from the Delaware White Clay Creek State Park along the Pennsylvania/Delaware border. The addition of the Replacement Property to the Pennsylvania Preserve would create a unique, contiguous area of public open space spanning two states and offering recreational opportunities for citizens of Pennsylvania, Maryland and Delaware.

Goals in acquiring the Replacement Property, other than for resolving LWCF conversions, are the preservation of extensive and diverse critical natural resources including more than 7 miles of Big Elk Creek and its tributaries, important forested riparian buffers along them, over 353 acres of mature and young woodlands, over 145 acres of floodplain, and moderate and steep slopes. The Replacement Property also contains habitat for various threatened and endangered plant and animal species. The Replacement Property represents a critical resource in a rapidly developing area of southeastern Pennsylvania. This acquisition is in accordance with the State Comprehensive Outdoor Recreation Plan ("SCORP") in which one of the priorities is to use federal LWCF funds to acquire critical wildlife habitat, forested watersheds, wetlands and riparian corridors for nature-based recreation.

The former Old Springlawn Road, which runs through the Replacement Property, has been converted to a public trail along Big Elk Creek maintained by Elk Township for hiking, biking, bird watching and horseback riding. The rest of the Replacement Property is comprised of forest land, rolling hills and agricultural fields. It is anticipated that the recreational activities permissible at the existing White Clay Creek Preserve's Big Elk Creek Section including hunting, hiking, fishing and wildlife watching will be allowed on the Replacement Property.

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JOHN LAWRENCE  
STATE REPRESENTATIVE  
DISTRICT OFFICE**I. Proposed Action**

The DCNR is proposing to transfer LWCF responsibilities of multiple LWCF properties throughout Pennsylvania (see Recreational Usefulness and Excess Value Table in Appendix C) to the Replacement Property. The proposed federal action is to approve this exchange after comparing the recreational usefulness and appraised fair market value of the properties in question. Additionally, the proposed federal action requested also is to establish a conversion replacement bank in the event there is excess fair market value and recreational usefulness at the Replacement Property after completing the conversion process for the conversions listed in Appendix C. The bank would be eligible for replacing additional LWCF conversions for a period of up to five years.

**2. PURPOSE AND NEED**

The purpose of the proposed Pennsylvania action is to resolve multiple LWCF conversions throughout Pennsylvania. The proposed action is needed to comply with the NPS's guidelines for LWCF funded sites in which land converted to non-recreational uses must be replaced with land of equal or greater value and recreational usefulness. Failure to resolve the conversions would put DCNR out of compliance with program requirements and potentially ineligible to receive additional LWCF funding. It would not change whether or not the Pennsylvania conversion parcels are used for non-recreation purposes and federal approval of those uses is not part of the federal action.

**3. ALTERNATIVES CONSIDERED**

The DCNR considered three alternatives to address the existing conversions of LWCF land. The first alternative was the "no action" alternative in which the sites with conversions would remain out of compliance. The second alternative was to remove the infrastructure that caused the conversions to make the sites compliant. The third, preferred alternative, was to replace the converted land and recreational usefulness.

The "no action" approach would not resolve the outstanding conversions and, therefore, not meet the purpose and need of the proposed action. Removing infrastructure to return sites back to recreational use would not be a feasible alternative considering the extent and cost of some of the conversions especially those associated with transportation and natural gas production. The DCNR chose to replace the converted land and recreational usefulness by purchasing the Replacement Property.

**4. ENVIRONMENTAL IMPACTS**

The NPS's Proposal Description and Environmental Screening Form ("PDESf") for the Replacement Property can be found in Appendix D. PDESf's and analysis of environmental impacts for the conversions will be included with the individual NEPA documentation for those sites.

**I. Recreation**

A summary of the recreation lost at the converted sites can be found in Appendix C. Most of the converted sites provide for some sort of passive recreation. These conversions are being bundled together for replacement by the Replacement Property because the Replacement Property will provide passive recreation opportunities including hunting, hiking, fishing and wildlife watching. Two of the converted sites contained recreational facilities (i.e. playground equipment). Only the value of these two sites are proposed to be replaced at the Replacement Property, the recreational usefulness will still need to be replaced elsewhere (yet to be determined). Given many of the

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conversions are small in acreage, one consolidated replacement site provides more recreational opportunities, especially for passive recreational activities, than smaller replacements all over Pennsylvania. In general, the converted areas of each LWCF property were negligible compared to the overall size of the property with the exception of four small neighborhood parks that were completely converted (each less than 1 acre in size).

## II. Natural

### a. Wetlands and Watercourses

Big Elk Creek is the main watercourse flowing through the Replacement Property from northwest to southeast. According to the Pennsylvania Fish and Boat Commission ("PFBC"), Big Elk Creek is trout stocked seasonally for recreational fishermen. Approximately five unnamed tributaries to Big Elk Creek also exist within the Replacement Property as well as Hodgson Run. Big Elk Creek has a designated use for High Quality-Trout Stocked, Migratory Fishes ("HQ-TSF, MF").

Analysis of the National Wetlands Inventory ("NWI") identified wetlands on the northwest edge of the Replacement Property along Big Elk Creek; a 3.13-acre, palustrine shrub scrub ("PSS") wetland and a 1.7-acre, palustrine forested ("PFO") wetland (see wetland and watercourse mapping in Appendix E).

The proposed action will not impact Big Elk Creek or its tributaries given that no development is proposed for the Replacement Property. Wetlands will also not be impacted as a result of the proposed action. If recreational facilities will be developed in the future, a field wetland identification and delineation will need to be conducted prior to any such development occurring on the Replacement Property.

### b. Floodplains

Federal Emergency Management Agency ("FEMA") flood mapping shows that Big Elk Creek has a Zone A FEMA regulated 100-year floodplain (shown in Appendix F). Hodgson Run and one of the unnamed tributaries to Big Elk Creek have FEMA regulated 100-year floodplains as well. Most of the Replacement Property is within a Zone X or area of minimal flood hazard. There will be no impacts to the FEMA regulated 100-year floodplains of Big Elk Creek, Hodgson Run or the unnamed tributary to Big Elk Creek as a result of the proposed action.

### c. Threatened and/or Endangered Species

A Pennsylvania Natural Diversity Inventory ("PNDI") review was conducted for the Replacement Property on March 14, 2018, and indicated potential impacts to a species under the jurisdiction of the PFBC as well as the U.S. Fish and Wildlife Service ("USFWS") and conservation measures for multiple plant species under the jurisdiction of the DCNR (see Appendix G).

The USFWS responded that bog turtle populations exist within close proximity of the Replacement Property. The Indiana bat and the northern long-eared bat have potential habitat within the Replacement Property; however, none of these species has known populations present.

Conservation measures consist of contacting the PA Bureau of Forestry for more information on the species and species-specific conservation recommendations if any construction, earth disturbance, or habitat management is proposed for the Replacement

Property. A conservation plan is proposed to be completed with the USFWS as it pertains to the species in reference.

Coordination with the PFBC determined that no adverse impacts are expected to species of special concern. In addition, coordination with the USFWS determined that there are no known populations of bog turtles, Indiana bats, or northern long-eared bats; however, their presence on the Replacement Property is possible. The USFWS recommends that the DCNR develop management plans for early successional vegetation for bog turtles and forest vegetation for both bat species. If development will occur in the future, habitat surveys will be necessary. Likewise, coordination with the DCNR Bureau of Forestry regarding the recommended conservation measures will be necessary if development of facilities will occur in the future.

d. Geologic Resources: Soils, Bedrock, Slopes, Streambeds, Landforms, etc.

The Replacement Property is underlain by oligoclase-mica schist of the Glenarm Wissahickon formation. The Glenarm Wissahickon formation is a schist metamorphosed to greenschist facies. Major constituents are quartz, albite, muscovite and chlorite. It also includes gneiss, hornblende gneiss and lenticular amphibolite bodies having ocean-floor basalt chemistry. There are no Outstanding Scenic Geologic Features or Heritage Geology sites within the Replacement Property.

Topography of the Replacement Property ranges from flat to steep slopes with an overall general sloping toward Big Elk Creek. Soils present include Baile silt loam, Chester silt loam, Codorus silt loam, Comus silt loam, Gaila silt loam, Glenelg silt loam, Glenville silt loam, Hatboro silt loam and Manor loam. The majority of soils present are considered Prime Farmland Soils and Soils of Statewide Importance.

The use of the Replacement Property to resolve LWCF conversions will not result in any impacts to bedrock, soils, slopes, streambeds or landforms. These resources will be preserved due to the proposed action.

e. Land Use/Ownership Patterns

The Elk Creek Watershed was originally settled by the Lenni Lenape people and then by English Quakers and Scotch-Irish Presbyterians. Its rivers and streams serve as municipal boundaries and powered mills throughout the 18th and 19th centuries. Throughout much of the 19th century the vast majority of the Replacement Property was in agricultural production. According to the Breous Farm Atlas (1883), the Replacement Property was broken up into numerous small farms, before being brought back under one owner by the DuPonts. The Replacement Property is currently privately owned by George Strawbridge and contains agricultural and forested land.

Following DCNR's acquisition of the Replacement Property, agricultural practices will cease within three years. Land use will be forested and open meadows for passive recreation. The DCNR Bureau of State Parks will implement invasive plant species best management practices ("BMPs") to prevent invasive species from taking over the revegetated agricultural land.

f. Hazardous, Residual or Municipal Waste Sites

A Phase I Environmental Site Assessment ("ESA") was conducted for the Replacement Property in July, 2017, and updated in July, 2018. It included a records review, review of

historical information, site reconnaissance, property owner interviews, and local official interviews. It was concluded that no potential recognized environmental conditions existed. No historical recognized environmental conditions or controlled recognized environmental conditions were identified at the Replacement Property. The complete Phase I ESA and update can be found in Appendix H. No hazardous, residual or municipal waste sites were found at the Replacement Property, therefore, there will be no impacts. Although no hazardous, residual or municipal waste sites were identified, a debris pile was observed near the ruins of the former residence/barns consisting of brick, concrete, wood, metal, tires and wire mesh fencing. This debris pile will be removed and transported to an appropriate permitted off-site facility for recycling or disposal.

***g. Air Quality***

Although the area in which the Replacement Property is located is rural, Chester County is within a non-attainment area for criteria air pollutants meaning it does not meet the Clean Air Act standards established by the U.S. Environmental Protection Agency ("EPA"). The proposed action is exempt from regional and project level air quality analyses under the National Environmental Policy Act ("NEPA") given that it does not involve development of the Replacement Property or construction of any infrastructure.

***h. Noise***

Noise levels in the Replacement Property area are assumed to be relatively low given the rural setting and lack of noise generating sources. Major roadways, railroads, developments, etc. do not exist in proximity to the Replacement Property. The proposed action is exempt from conducting a noise analysis under NEPA given that it does not involve development of the Replacement Property or construction of any infrastructure.

There will be no increases in ambient noise levels as a result of the proposed action. The use of the Replacement Property to resolve LWCF conversions will not cause activities or development that will increase noise levels.

**III. Cultural**

***a. Above Ground Historic Resources***

Coordination with the Pennsylvania State Historic Preservation Office ("PA SHPO") determined that there are no structures listed or eligible for listing on the National Register of Historic Places ("NRHP") present within the Replacement Property (see Appendix I). It was also determined by the SHPO that given the proposed action no further studies are required regarding above ground historic resources. There are no NRHP listed or eligible resources within the Replacement Property; therefore, there will be no impact to above ground historic resources.

***b. Archaeological Resources***

Coordination with the PA SHPO determined that there is a high probability for archaeological resources within the Replacement Property; however, the use of the Replacement Property for LWCF conversions will have no effect on such resources (see Appendix I). One of DCNR's goals in acquiring the Replacement Property is to preserve cultural resources. The Replacement Property contains several foundations and ruins from previous

farming operations. Phase I archaeological surveys of the area will need to be conducted prior to any development or ground-disturbing activities on the Replacement Property. The proposed action will have no impact on any archaeological resources; however, a Phase I archaeological survey will be required before any development of the site can occur in the future.

c. Tribal Notification

NPS sent consultation invitations to the Delaware Tribe of Indians and the Delaware Nation, Oklahoma in mid-October, 2018 (see Appendix J). NPS received a response from the Delaware Nation on November 6, 2018. They concurred that the acquisition of the Replacement Property would not adversely affect any known tribal resources, however, there is a high probability of archaeological resources present. The Tribe recommends archaeological studies be conducted before any construction activities take place in the future as well as mitigation measures if archaeological sites are found (see Appendix J). The Tribe also recommends protection of indigenous plants and/or re-introduction of indigenous plants to the area.

**IV. Socioeconomic**

a. Environmental Justice Populations

Analysis of the Pennsylvania Department of Environmental Protection's ("DEP") eMap PA online mapping application did not identify any environmental justice populations using the 2010 census data and 2015 American Community Survey data in proximity to the Replacement Property (see Appendix K). The use of the Replacement Property for LWCF conversions will have no impact on any environmental justice populations.

b. Tax Base

Once owned by the DCNR, the Replacement Property will be immune from state and local taxes. This may impact the local tax base given that the Replacement Property is almost 1,000 acres in size; however, impacts will not be significant. The presence of **preserved open space** will benefit surrounding property values. This may help offset the decrease in the local tax base from the DCNR's acquisition of the Replacement Property.

**5. CUMULATIVE IMPACTS**

Cumulative impacts are direct and indirect environmental impacts caused by the combined results of past, current and future activities. Past, current and future activities at the Replacement Property include agriculture, preservation and recreation.

Past and current agricultural uses of the Replacement Property have caused forest fragmentation but have also provided habitat variety and a variety of hunting, hiking, fishing and wildlife watching opportunities. Big Elk Creek is part of the Chesapeake Bay Watershed and efforts have been made regarding farming practices and land management over the years to improve water quality. Following DCNR's acquisition of the Replacement Property, and upon approval of the proposed action by NPS, agricultural practices must cease within three years. Active agriculture is not an allowable use of LWCF Section 6(f) protected land. This will allow the revegetation of riparian forest land and the planting of warm season grasses for habitat and invasive species management



which will be conducted by the DCNR Bureau of State Parks. Potential future recreational facilities may be developed that will provide more variety of recreational opportunities.

DCNR's acquisition of the Replacement Property will preserve critical habitat and open space in an area that has been experiencing increased development. Although there are no known populations of threatened or endangered species on the Replacement Property, there are populations in close proximity and it is possible that they exist within the Replacement Property boundaries, if suitable habitat exists. Acquisition of the Replacement Property will help with species conservation.

It will also provide more recreational opportunities such as hunting, hiking, fishing and wildlife watching for the surrounding population. Southeastern Pennsylvania does not contain many public areas that allow hunting. The Replacement Property will provide hunters and other people with recreation interests who live in the densely populated southeastern Pennsylvania region a closer and more convenient area to recreate.

## 6. COORDINATION AND OUTREACH

### I. Agency Coordination

Coordination with the USFWS, PFBC and DCNR was conducted to determine potential impacts to threatened and/or endangered species as a result of the proposed action. Coordination was also conducted with the PA SHPO to determine the presence of historic resources and potential impacts. Tribal consultation invitation letters were sent by NPS to federally recognized tribes with an identified interest in Chester county.

### II. Public Outreach

This EA was advertised on the PA Bulletin January 19 through March 4, 2019 for public review and comment. During the public comment period. Public comments and responses to comments can be found in Appendix L. A public hearing was not requested during the public comment period.

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