

**From:** [Keith, Diane J.](#)  
**To:** [Tom Kelso](#)  
**Cc:** [John Carroll](#)  
**Subject:** Thomas A. Edison Park. Edison Township, Middlesex County, NJ  
**Date:** Wednesday, September 27, 2023 4:53:39 PM  
**Attachments:** [image.png](#)  
[image.png](#)  
[20230926\\_105641669 Edison ESF NPS Comments.pdf](#)  
[FLP Policy Information on Concession Agreements Leases and Revenue.pdf](#)  
[2021\\_MWR NPS\\_FLP Ohio Nathan Hale EA rev 2021\\_11\\_20.pdf](#)  
[2022\\_01\\_12\\_HALE FONSI\\_FINAL.pdf](#)

**CAUTION:** This email originated from outside the Middlesex County organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

**OFFICIAL CORRESPONDENCE SENT VIA ELECTRONIC MAIL**

National Park Service  
Federal Lands to Parks  
Northeast Region  
15 State St  
Boston, MA 02109

**HARD COPY TO FOLLOW**



**United States Department of the Interior**

NATIONAL PARK SERVICE  
Interior Region 1  
North Atlantic-Appalachian  
15 State Street  
Boston, MA 02109



IN REPLY REFER T

September 27, 2023

**Reference:** Former portion, Raritan Arsenal  
Thomas A. Edison Park  
New Brunswick, Middlesex County, NJ  
GSA Control Number: D-NJ-440C

Dear Mr. Kelso,

The National Park Service Federal Lands to Parks Program (FLP) has reviewed the information in the Environmental Screening Form for the athletic fields development project at Thomas A Edison Park in Edison, NJ and has determined that further environmental compliance is needed per the National Environmental Compliance Act (NEPA). NPS is requesting that Middlesex County prepare and submit an Environmental Assessment (EA) to better evaluate the impact of the development.

In reviewing the ESF, consideration of the impacts were evaluated to be “none” or “negligible” without adequate consultation documentation to support those determinations. I have included the ESF with comments provided in blue to clarify what is needed for each impact category.

There were references to previous reports, studies, and other documents that can be integrated into an Environmental Assessment to justify the conclusions made in the ESF about certain impacts. An Environmental Assessment can provide an opportunity to include information that substantiates the conclusions about the significance of the impacts but must also meet certain NEPA requirements.

As stated in my letter to Mr. Richard Lear dated May 1, 2023, I advised the County "... to be aware that any construction on FLP properties must comply with the National Environmental Compliance Act (NEPA) <https://www.doi.gov/nepa> because of the federal nexus with the Department of the Interior". I have attached the ESF with NPS comments (in blue) to help clarify where there are federal requirements that need to be met. It is stated in the ESF you provided that the evaluation of impacts were not based on NEPA requirements. Potentially, information from studies, plans, permits and other documents referenced in the ESF can be used to assist in the development of the EA.

In reviewing both the Draft Amendment to the Program of Utilization and the ESF, there are two things that I would like to point out as we work to complete the EA and project approval.

First, more information about how the destination athletic complex will be managed and, specifically, how revenue is generated, collected, and used by the County would be appreciated. The deed restrictions include the following covenant:

*" 3. The party of the second part will not sell, lease, assign or otherwise dispose of the premises, except to another local Government agency, that the Secretary of the Interior, or his successor in function, is satisfied can assume the continued use and maintenance of the property for a public park and public recreational area purposes."*

I have also attached the FLP revenue policy for your consideration when determining the management plan for the facilities. It would be appreciated if the County can provide a management summary to the NPS that incorporates this information.

Second, there doesn't appear to be any information about alternative locations or alternative designs of the facilities that were considered. Could you please clarify if there were any alternatives considered during the development of the proposed athletic facilities? How was this location chosen and if there was any public engagement in that process?

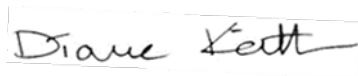
NPS will be available to assist the County in completing the EA by clarifying information and reviewing drafts as needed.

The NPS is aware that Middlesex County has deadlines for completing this project and we will try to respect those deadlines and complete NPS reviews as quickly as possible so as to facilitate the process.

While we don't actually have any templates or checklists to assist with the completion of the EA, I am attaching an example of an Environmental Assessment that was completed for a different request to change a Program of Utilization that I hope might be helpful. I will also try to send more information that might help by the end of this week.

If you have any questions, please feel free to contact me at 617-981-2154.

Thank you for your assistance and I look forward to working with you.



Diane Keith  
Program Manager  
Federal Lands to Parks / Northeast Region

Attachments (4)

Diane Keith  
Program Manager  
Federal Lands to Parks / Northeast Region  
15 State St. Boston, MA 02109  
617.981.2154  
*pronouns: she/her*  
*hours: 8AM - 5PM M-F*

[Federal Lands to Parks](#)  
NORTHEAST REGION  
Interior Region 1: CT, ME, MA, NH, NJ, NY, RI, VT  
Interior Region 3: IL, IN, MI, MN, OH, WI  
Interior Region 4: IA, MO  
Interior Region 5: KS, NE, ND, SD