

**United States Department of the Interior**

**National Park Service**

**Federal Lands to Parks Program**

**FINDING OF NO SIGNIFICANT IMPACT**

**Thomas A Edison Park  
Middlesex County  
New Jersey**

**September 2024**

**INTRODUCTION**

Middlesex County (County), New Jersey seeks to amend the Program of Utilization (POU) agreement with the National Park Service (NPS) for Thomas A. Edison Park (Park). The NPS has adopted an environmental assessment (EA) prepared by the County with input from the NPS to analyze the potential impacts associated with the amended POU. That EA is hereby incorporated in this FONSI by reference. Middlesex County is responsible for the accuracy of the information provided in the EA, however NPS has independently reviewed the EA prior to adoption.

Thomas A. Edison Park is a 177-acre property located in Middlesex County, New Jersey. Middlesex County acquired 161-acre of this site at a fifty percent discount via a 1964 quitclaim deed through what is today called the NPS Federal Lands to Parks Program (formerly the Surplus Property Program for Parks and Recreation administered by the Bureau of Outdoor Recreation and subsequently by the NPS) pursuant to the Federal Property and Administrative Services Act, as amended (40 U.S.C. 550 (b) and (e)). The Act allows surplus federal lands to be deeded to local jurisdictions under the condition that the land is used in perpetuity only for public park and recreation purposes. Through the County's outdoor recreation planning efforts, the County identified a need for additional recreational capacity and diversity of sporting options at the park. They subsequently contacted the NPS to ensure that their proposed changes to facilities provided in the park would be consistent with a NPS approved Program of Utilization and in compliance with the terms of the USA Deed.

The federal action involved is to either approve or disapprove of the County's request to amend the POU to satisfy current and anticipated future recreation needs in Middlesex County. This action is not subject to NPS 2006 Management Policies that relate to units of the National Park System. Specifically, this Federal Lands to Parks Program does not fall under the NPS Organic Act, and analysis of impairment to national park values and resources is not required.

The NPS does not own, manage, or operate properties conveyed through its Federal Lands to Parks program, but is charged, on behalf of the federal government, with ensuring the public park and recreation purpose of such conveyances is fulfilled. The NPS is required "to determine and enforce compliance with the terms, conditions, reservations, and restrictions contained in any instrument by which [a] transfer was made" of surplus Federal properties to State and local governments for park and recreation purposes pursuant to Section 203{k}{4}(C)(i) of the Federal Property and Administrative

Services Act of 1949, as amended (40 U.S.C. §550). The NPS Federal Lands to Park Program has the responsibility to ensure that properties are utilized in accordance with their intended park and recreation use.

The NPS does not become involved in local land use decisions in which local governments weigh the benefits and costs of various alternatives to providing needed public services, except to remind recipients of their obligations under the terms of the Federal Lands to Parks conveyances. The perpetuity requirement of federal surplus properties conveyed for public parks is the basis of the program that aims to enlarge and protect the public recreation estate. The federal action for NPS is to either approve or deny the proposed amendment to the program of utilization based on the proposal meeting the public parks and recreation deed requirements.

An agency may adopt another agency's environmental assessment (EA), or portion thereof, if the actions covered by the original EA and the proposed action are substantially the same, and the assessment meets the standards for an adequate environmental assessment under the regulations and the adopting agency's NEPA procedures per 40 CFR § 1506.3(c). NPS is adopting this EA and has determined that it meets NPS NEPA requirements for EAs, including public review. This EA was developed under the 2020 and 2022 CEQ NEPA implementing regulations, because it was started prior to the promulgation of the 2024 CEQ NEPA implementing regulations.

This finding of no significant impact (FONSI) and its associated EA constitutes the record of the decision-making process.

This document records, (1) a finding of no significant impact as required by NEPA; (2) a finding of not likely to adversely affect (with incorporated conservation measures) federally listed species or their habitat as required by the Endangered Species Act, Section 7; and (3) a finding of no historic properties affected, as required by the National Historic Preservation Act, Section 106, as it relates to the development of this design concept plan. This finding of no significant impact is available on the National Park Service Planning, Environmental and Public Comment (PEPC) website at: [ParkPlanning - Thomas A. Edison Park Change of Program of Utilization \(nps.gov\)](https://www.nps.gov/parkplanning-thomas-a-edison-park-change-of-program-of-utilization)

The County provided opportunities for public comment during a public hearing on March 29, 2023, conducted by the New Jersey Department of Environmental Protection (NJDEP) Green Acres Program and comments were received from the public and addressed by the County and NJDEP. The NPS accepted public comments for the Edison Park Change in the Program of Utilization during release of the Environmental Assessment (EA) from August 2 to September 3, 2024. Substantive public comments received and responses by the NPS are summarized in Appendix A.

## **SELECTED ACTION AND RATIONALE FOR DECISION**

The EA analyzed two alternatives in detail: Alternative A – No Action and selected Alternative B – the action alternative which amends the POU to provide for additional active recreational facilities at the park and to expand the active recreational use area of the property by 11 acres to a total of 88 acres. Of the 88 acres, 81.42-acres are part of the approximately 161 acres subject to the Middlesex County Thomas A. Edison Park deed restrictions. The public will have free access to the park and facility fees will not change from the current structure. The selected action is compliant with the FLP deed for the property and provides recreation for the public.

As a result of this action, the NPS will amend the POU and the County may implement the selected action alternative to include additional active recreational facilities at the park and to expand the active recreational use area of the property by 11 acres to a total of 88 acres. The proposed action was selected after careful analysis of resource and visitor impacts, and consultation with the U.S. Fish and Wildlife Service (USFWS), the New Jersey Department of Environmental Protection, New Jersey State Historic Preservation Officer (SHPO), and review of public comments.

The selected action amends the POU to include:

- ten multi-sport fields, three multi-sport baseball/softball lined fields,
- sixteen hard surface tennis courts,
- a championship field with a track and grandstands,
- a 500-foot diameter natural turf recreational cricket field,
- protective netting, performance lighting, and bleachers,
- a fieldhouse for concessions, restrooms, and maintenance equipment,
- comfort stations,
- pathways for walking and bicycling and a playground.
- parking for 1,350 cars
- a landscaping plan with trees and a successional meadow
- installation of more resilient stormwater management systems.

In response to feedback from local conservation groups, more than three acres of successional meadow will be incorporated into the design for birding, an increase from the originally planned one acre, and additional walking trails and benches have been added to the latest design.

Details of the selected action and the no action alternatives are described in Chapter 2 of the EA.

**MITIGATIONS**

The selected action includes mitigation measures that will help to avoid and/or minimize adverse impacts of the project to natural and cultural resources.

Resource	Issue	Mitigation, Best Management Practice, Etc.
Northern Long-Eared Bats	Section 7 of the Threatened and Endangered Species	<ul style="list-style-type: none"> <li>• Time-of-Year Work Restrictions. Nov 1<sup>st</sup>–April 14<sup>th</sup> (Inactive period for Northern Long-eared Bat)</li> <li>• No tree cutting greater than 3 inches diameter breast height (dbh) during the active season.</li> <li>• Erosion and sediment controls.</li> </ul>
Wetlands	Section 404 of the Clean Waters Act	<ul style="list-style-type: none"> <li>• Avoid and minimize adverse effects to wetlands.</li> <li>• Use of heavy equipment with low ground pressure.</li> <li>• Stabilize disturbed soils with native plants.</li> <li>• Erosion and sediment controls.</li> </ul>

## **SIGNIFICANCE CRITERIA REVIEW**

### **Potentially Affected Environment**

Thomas A. Edison Park is situated within an approximately 161-acre portion of, the Township of Edison, Middlesex County, New Jersey and occupies the site of the former Raritan Arsenal, initially developed for military shipments during World War I, and decommissioned in 1961. Acquired by the County of Middlesex in 1964 through the National Park Service's Federal Lands to Parks Program, at fifty percent discount, the property was repurposed, and construction of the park commenced in 1974. It includes six multi-sport fields, three baseball/softball fields, a track with a grassed field, 16 tennis courts, exercise stations, walking paths, picnic tables, playground, a model airplane field, natural grass, and large trees for enjoying nature, birdwatching, and a small field house. Thomas A. Edison Park is currently developed for active recreation while also providing passive recreation. It is the most active recreational facility in the Middlesex County Park System.

### **Degree of Effects of the Action**

The NPS considered the following actual or potential effects in evaluating the degree of effects (40 Code of Federal Regulations [CFR] 1501.3(b)(2)) for the selected action. As documented in the EA, the selected action has the potential for both adverse and beneficial impacts on wetlands, vegetation, wildlife habitat, cultural landscapes, and recreation (Chapter 4 of the EA). These potential impacts and prescribed measures designed to avoid significant adverse impacts are summarized below.

#### **a. Beneficial and adverse, and short- and long-term effects of selected action.**

The duration of impacts is measured in short-term impacts (i.e., those that occur during implementation of the action and the first three to five years following) and long-term impacts occurring over the time it takes for ecological or landscape change, which can be decades up to 100 years.

**Wetlands.** The study area has approximately 204.6 acres, of which 123.4 acres is wetlands and waters. The majority of these wetlands (Wetland D) are located within the southern and southeastern section of the study area. These wetlands are presumed of exceptional resource value due to the presence of foraging habitat for yellow-crowned heron, a State threatened species. No changes or land disturbance is anticipated in the Wetland D area. There is an approximately 1.1 acres of the delineated wetlands in the northern section of the study area (Wetlands A, B, and C). Wetlands in the study area are regulated under Section 404 of the Clean Water Act administered by the United States Army Corps of Engineers (USACE) and further delegated to the NJDEP. Delineated wetland areas, A, B, and C include those associated with delineated tributaries, human-made ditches and swales in headwaters, outfall structures and an isolated depressional area. The limited resource value of onsite wetlands and wetland transition area widths were confirmed by NJDEP in the Freshwater Wetland General Permits 7 and 11 issued for the project (NJDEP Permit No: 1205-23-0007.1 LUP230001). The proposed project would fill or pipe the swales and ditches within the active park property for proper design and stormwater management. In addition, minimal impacts to wetlands and transition area are proposed at Wetland C for stormwater outfall structures. A total of 0.862 acres of regulated freshwater wetlands would be impacted by the proposal, specifically 0.839 acres of wetlands associated with human-made ditches/swales in headwaters under an NJDEP General Permit (GP) #7 and 0.023 acres of wetlands

associated with outfall structures (GP#11). The total area of wetland transition area associated with outfall structures to be impacted is 0.087 acres (GP#11). Impacts have been minimized to the extent feasible by avoiding disturbance of the wooded wetlands or associated buffers in the southern and southeastern section of the park. The proposed impacts to wetlands and wetland transition areas are permitted under NJDEP Freshwater Wetland General Permits and the effects of stormwater will benefit the park.

**Vegetation.** The proposal involves the replacement of all 77 acres of existing active-use park facilities, including some existing vegetation. 11.4 acres of wooded area within the 161-acre park land will be converted to active-use park land, resulting in a new total active park use of 88 acres. This leaves approximately 81.42 acres of the 161-acre Middlesex County Park property remaining in its current state, unaffected by the proposed changes.

Based on the surveys conducted by the County for the EA, the 11.4-acre woodland area does not contain any threatened or endangered species or species of concern. No impacts are proposed to the vegetation in the wooded wetland and associated transition area. All temporarily disturbed areas would be restored to their previous existing condition and elevation or to the condition depicted in the Landscape Plan. Temporarily disturbed areas would be reseeded in accordance with an approved SESC Plan from the Freehold Soil Conservation District (FSCD) and any NJDEP permit requirements. No specific mitigation for removed trees would be required except as stated in the consultation letter from the US Fish and Wildlife Service. As part of the planting plan for the project, approximately 3 acres of land to the north of the existing forested land is to be planted as a successional meadow that will gradually grow into forest, and additional trees will be planted throughout the site along paths and in several groves to offset the impact of tree removal. The remaining vegetation will leave almost half of the vegetation unchanged, and the recreational purpose of the original land conveyance does not result in significant adverse effects to the vegetation.

**Wildlife Habitat.** Short-term adverse impacts to wildlife habitat will result from the selected action. The maintained grass fields and recreational fields totaling 19.28 acres would be replaced with artificial turf fields totaling 32.49 acres. According to the NJDEP Landscape Project data and USFWS, the grassed areas do not serve as habitat for state or federally endangered or threatened species; therefore, there would not be expected to impact to endangered wildlife within the area. The effect on wildlife in the area would be a loss of 11.4 acres of forested habitat. According to the information provided in the EA, it has not been identified by USFWS as critical habitat for any threatened or endangered species or species of concern. Approximately 3 acres of land is to be planted as a successional meadow that will gradually grow into forest, and additional trees will be planted throughout the site along paths and in several groves to compensate for the loss of the forested habitat. Initially, there may be displacement of some wildlife, but it is anticipated that wildlife will return gradually as the meadow and trees mature. Generalist species like squirrels, woodmice and shrews as well as lizards, frogs, toads, finches, and sparrows have broad niches. They can live in different types of habitats, eat a variety of foods, and tolerate a wide variety of environmental conditions and also demonstrate a high tolerance to changes in their habitats. They are able to consume a wide range of food sources, including plants and insects. This resilience enables them to quickly recover and thrive in varied ecosystems and they are more likely to spread into new environments, contributing to their long-term survival.

We find that the proposed changes to public recreation that fulfill the recreational purpose of the original land conveyance do not result in significant adverse effects to threatened or endangered species or generalist species.

**Cultural Landscape.** Although the proposed project is located within the boundaries of the NRHP-eligible Edison Facility Historic District, the undertaking is considered to have no adverse effect on the historic district and any contributing buildings associated with the historic district. The removal of mid-20th century standard concrete culverts to accommodate the Project will likewise have no adverse effect on the historic district. NJ SHPO provided its recommendations that the proposed undertaking had “low potential to affect historic and archaeological remains” and no further consideration was needed for the purposes of Section 106 of the National Historic Preservation Act review. The SHPO consultation letters are included in the EA.

**Recreation.** The original Program of Utilization established the purpose of the park to provide for a spectrum of recreational opportunities including facilities to accommodate both active and passive recreational **pursuits**. The park was subsequently developed based upon public recreation needs determined first in 1964, then updated in 2008. The County’s most recent recreational needs assessments are based upon current demographics, experience with park operations, current demand, changed climate conditions, and anticipated future demand. To meet that demand, the County has proposed new facilities to accommodate more active recreation while maintaining a spectrum of both active and passive recreation types. The installation of a greater number of play fields incorporating more resilient and durable play surfaces available throughout the year, will yield a beneficial long-term effect for active public recreation opportunity. The project will involve replacing 11.4 acres of woodland which currently provides opportunity for passive recreation in the form of walking, nature immersion and wildlife observation, with more opportunities for active recreation. Based on assessments of current recreation facility demand in the County, anticipated future demand as well as the use patterns of Edison Park, the new configuration will result in significant long-term beneficial recreation effects. The increase of active public recreation opportunities to meet what the County has determined to be its current and future needs provides substantial justification for its proposed change of recreational use of those areas currently in open mowed grass playfields and woodland from passive to active recreation. Passive recreational use will remain a major recreational opportunity in the park as it will still provide picnic areas, open fields, and paths for walking, nature immersion, and wildlife observation on the 89 acres of the park not devoted to facilities for active recreation.

The County’s POU amendment proposal, with its change of recreation types, continues to meet the purpose of the public benefit conveyance for park and recreation area purposes, and specifically for Edison Park, to provide for a spectrum of recreational opportunities based upon the County’s current recreational needs assessments. Although there may be short-term adverse effects of the County’s proposed development plans due to temporary closures where work is taking place, the closures will be for the sake of public health and safety, and they will result in long-term benefits to public recreational use of the park, particularly to active recreational users. The reduction of the wooded area by 11.4 acres will result in a long-term adverse effect to passive recreation. The path through the remaining woods will continue, and mitigation for the loss of passive recreation will be provided through the addition of trails throughout the project and will provide opportunities for picnicking, nature study and

birding as well as other recreational uses. Planting of native vegetation, including trees, along the new walking paths will be provided as mitigation for the loss of birding opportunities. In addition, a one-acre area north of the existing forested area will be planted as a successional meadow, developing new bird habitat over time. New trails will provide improved connectivity to trails adjacent to the park.

With the trade-off of recreation types based on identified current and future needs, changed climatic conditions, and the recreational purpose of the original land conveyance, we find that the proposed changes to public recreation do not result in significant adverse effects.

**b. Degree to which the selected action affects public health and safety.**

An objective of the County is to increase usage with as little environmental impact as possible. While adding more natural turf fields could increase playable hours, it would result in a larger ecological footprint to achieve the playing time goals. Opting for artificial turf is intended to address the challenges of usage needs and minimizing the field space. With implementation of the proposed plan with mitigation measures, the County anticipates the selected action will not adversely affect public health or safety. Artificial turf allows for a compact layout, maximizing playable hours in a limited space. In contrast, natural grass would need significantly more acreage to provide the same usage due to maintenance and weather-related closures, potentially impacting more natural areas, including woodlands and wetlands.

The anticipated effects of climate change, including sea-level rise, necessitate the creation of stormwater management systems robust enough to protect these recreational areas. Upgrading the facilities at Edison Park is therefore essential to maintain and enhance community access to recreational opportunities, reflecting the park's dedication to promoting a thriving, healthful, and active environment for all its residents. Input from community outreach has underscored the urgency to augment existing facilities with improved drainage and weather resilience to handle the increasing flood risk. The OSRP specifically identified Thomas A. Edison Park as susceptible to sea-level rise, a concern accentuated by its status as the most frequented park in the County.

In Middlesex County, the call for recreational infrastructure that is both sustainable and resilient to climate change is imperative. The 2022 OSRP brings to the forefront the need to adapt to environmental challenges such as increased flooding and more frequent, intensive rainfall events.

Artificial turf fields experience elevated surface temperatures as compared to natural grass fields. The level of increase in surface temperature depends on the turf product and infill material used and can be impacted by other environmental factors such as wind, humidity, and ambient temperature. While elevated temperatures are associated with the installation of artificial turf fields, measures would be taken to minimize and mitigate these impacts. Middlesex County will use UV-resistant turf, cool climate turf, and/or reflective infill and fiber materials that have been shown to considerably reduce the surface temperature of artificial turf fields. Therefore, while it is understood that the replacement of natural fields with artificial turf fields can impact surface temperatures, the use of technologically advanced artificial turf will help minimize these increases. Incorporating artificial turf fields into the Project is expected to have a minimal impact on surface or groundwater quality due to the improved stormwater system. Middlesex County is required to maintain and monitor the implemented BMPs to minimize potential impacts to surface water quality. Additionally, the EPA is setting new standards to prevent the introduction of PFAS

into the environment, and while the turf industry is widely shifting their products away from any use of PFAS, the County is ahead of regulations by requiring turf materials to meet stringent PFAS certifications that use EPA testing methods, ensuring PFAS chemicals are not intentionally used in the manufacturing process.

**c. Effects that would violate federal, state, tribal, or local law protecting the environment.**

The selected action does not violate applicable federal, state, or local environmental laws or requirements imposed for the protection of the environment. The County complied with all Federal, State, and local laws with relevance to the selected alternative. NJDEP issued all necessary permits for the construction of the facilities and has reviewed the project through appropriate regulatory state processes. The New Jersey Green Acres program reviewed the proposal and approved the changes in 2023.

The NPS and County reviewed USFWS data to analyze the effects of the proposed action on federally listed species known to occur within the EA project area. Effects from the selected alternative may affect but are not likely to adversely affect special status species considering the mitigation measures that would be implemented. Northern long-eared bats were analyzed using IPaC and its 4(d) rule. Following this comprehensive review and subsequent consultation, on March 5, 2024, the USFWS determined the project is not likely to adversely affect the species.

The U.S. Army Corps of Engineers (USACOE) issues General Permits for activities subject to jurisdictional waters of the U.S. in accordance with 33 CFR 320-332. USACOE reviewed the EA in June 2024 and did not find any action that would be subject to jurisdictional waters of the U.S.

Preliminary project notification was sent to the SHPO on February 21, 2024. The NPS received a response on March 14, 2024. The SHPO concurred with a determination of no historic properties affected. The NPS worked with the New Jersey Commission on American Indian Affairs and the SHPO to contact the Delaware Nation and Delaware Tribe of Indians to determine their interest in the review of the EA on September 28, 2023, and did not receive any response or comments. NPS contacted the tribal leadership again on August 7, 2024, sending them information and the link to the EA on PEPC requesting their response within 30 days but did not receive any comments or questions.

**FINDING OF NO SIGNIFICANT IMPACT**

- Based on the information contained in the EA and associated POU amendment proposal documents, I have determined that the proposed action does not constitute a major federal action having a significant effect on the human environment.
- This finding considers the Council on Environmental Quality criteria for significance (40 CFR 1501.3 regarding the potentially affected environment and degree of the effects of the impacts described in the EA (incorporated by reference) and as summarized above.
- The final decision is also based on the limited jurisdiction of the Federal Lands to Parks to evaluate only whether a proposed new use is consistent with park and recreation purposes as guided by the property deed, the original Program of Utilization and FLP policies.
- Therefore, environmental impacts that could occur are limited in context and intensity, with general beneficial impacts to increasing active sports recreational activities, visitor use and



experience. While there are concerns about potential impacts on public health and the environment due to the County's decision to use artificial turf and the change to the type of recreation from public passive recreational activities to regulated sports activities, the proposed changes still fall under the category of recreation and the park will remain open to the public, and passive recreational opportunities continue to be available to the public at this park site. There are no unmitigated diverse impacts on public health, public safety, unique vegetation, or federally threatened or endangered species.

Based on the foregoing, it has been determined that an environmental impact statement is not required for this project and thus will not be prepared.

Recommended: \_\_\_\_\_  
Diane Keith, Northeast Program Manager  
Federal Lands to Parks Program  
Date

Approved: \_\_\_\_\_  
Gay Vietzke, Regional Director  
National Park Service, DOI Region 1  
Date

Attachment: Errata and Response to Comments

NPS Interior Region 1 Documents appended to the FONSI include:

- Appendix A: Errata
- Appendix B: Public Comment Response

**ATTACHMENT A  
Errata**

**Thomas A Edison Change in Program Utilization  
Environmental Assessment**

**September 2024**

On August 2, 2024, The NPS released the Environmental Assessment (EA) for public comment. Striving to reach a broad audience, the park distributed announcements by e-mail and/or hard copy to local, state, and federal government officials; and individuals who had previously expressed an interest in the planning process. The County also announced the release of the EA via press release and on their website. The public was asked to review the plan and share their comments for 30-days between August 2 and September 3, 2024, related to environmental analysis of actions proposed for the study area.

This section includes both minor edits and technical revisions to the EA that resulted as a response to comments received from general commenters and consultants during the public review period. These revisions do not change the outcome of the impact analysis, nor do they affect the final decision documented in the Finding of No Significant Impact.

The Errata, when combined with the EA, comprises the only amendment deemed necessary for the purposes of completing the Thomas A. Edison Park EA.

Commenters noted suggested edits and changes in the plan text that may require correction or clarification. These technical revisions and additions are noted below.

**Clarification or Minor Technical Edits:**

<b>Page/Section</b>	<b>Revision or Change</b>
Page 9, Section 1.2	Acreages Map should include a section of the property that is owned by the County that is located within the FLP boundary. This does not affect the EA.
Page 16, Section 3.2	The new successional meadow should read 3.1 acres, not 1.1 acre
Page 18, Section 3.2	Paragraph clarifying concession agreements. County will follow FLP policy.
Page 69, Appendices	Removed Project Technical Files.

**ATTACHMENT B**  
**Public Comment Response**

The 30-day comment period for the EA occurred from August 2 to September 3, 2024. The NPS announced the EA's availability on the NPS Planning, Environment, and Public Comment (PEPC) website. In addition, the County announced the EA's availability via their website. A total of 594 correspondences were received with 510 of these submitted through the NPS PEPC website, 24 by mail, and 60 by email to the NPS. Of these, there were 389 substantive comments, many of which repeated the same concerns.

**Public Concerns**

Concerns about the project are summarized below. NPS is limited to evaluating whether the proposed change to the POU is consistent with the park and recreation purposed for which the property was conveyed and the terms of the deed. The NPS does not have authority in local land use decisions in which local governments weigh the benefits and costs of various alternatives to providing needed public services.

The County presented a proposal to amend the POU to establish an expanded recreational use of the property and the proposal must serve the stated public recreational use, to satisfy the legal statute.

However, NPS will continue to monitor the use of the park for compliance and will work through concession agreements that will guarantee continued public access and the use of funding raised from facilities be used for park and recreation. Summaries of substantive comments and concerns that were reiterated by the public with the County and NPS responses are as follows:

**Concern 1: Thomas A. Edison Park is being lost as a recreational resource and will become a money-making venture for the County and associated for-profit entities. Public space will be unavailable and displaced by commercial activity.**

*Response:* The proposed action maintains park as a public space under the Middlesex County Office of Parks and Recreation and NPS FLP deed restrictions, retaining its current name, ownership, rules, and regulations. The proposed action would not transform Thomas A. Edison Park into a for-profit recreational space. As required by NPS Federal Lands to Parks and the New Jersey Green Acres programs, all revenue generated will go toward maintaining and operating County parks. Individuals will continue to have access to the park during operating hours for passive recreation, and organized groups such as sports organizations will continue to pay reservation fees to use fields, courts, and other facilities.

The primary goal of the proposed action is to better serve the current and future recreational sports needs of Middlesex County residents. Thomas A. Edison Park already serves as the largest athletic complex in the county park system, with nine existing athletic fields. The proposed improvements aim to increase this resource by adding five new fields, thereby expanding opportunities for sports and recreation for county residents.

Under the proposed action, the County would not impose any burden on the general public that would make going to the park any different than today. All existing recreational uses and public access would continue as before, ensuring that all current users can still enjoy the park's amenities. As with the park's current practice, there would still be a reservation system for certain fields, such as league sports, which may be required to pay a fee, in the same manner as it is today.

Deed restrictions require that the property be used for public recreational purposes, not commercial ones. There may be incidental commercial operations contracted for the purpose of better accomplishing the Program of Utilization and to enhance the public's use and enjoyment of the recreation facility but setting aside portions for exclusive use of paying customers is not acceptable. The NPS and the County will develop a Concession Agreement for any additional services at the park and FLP will continue to have FLP oversight. Section 3 of the EA explains the operational proposal in detail.

**Concern #2: The park will now require payment for entry and be inaccessible to existing users, some of whom are lower income, who will no longer be able to afford or access the park. The new users will displace existing users.**

*Response:* The proposed action does not require payment for entry, and access will remain the same as it is today. General park grounds, including paths, grassy areas, and wooded spaces will remain available and accessible to the public free of charge. Additionally, unreserved park facilities (such as fields and courts that are not gated or have open gates) will continue to be available for public use without charge on a first-come, first-served basis, as long as users comply with park rules. Passive recreation amenities will remain free of charge.

Use fees will be required, as they are currently, for the reservation of park facilities for organized group use. Thomas A. Edison Park, like all Middlesex County parks, uses a reservation system and fee schedule for this purpose. These fees and related policies are published on the Middlesex County website under "[Middlesex County Parks and Recreation Rules, Regulations, and Fees](#)." This system will continue to be in place after the proposed park's renovation.

Organizations and groups currently using the park will continue to do so under the same conditions. In 2022 there were 1,328 facility reservations for team sports events, totaling 24,785 individuals using the fields. The County anticipates the ability to continue to accommodate both existing users due to remaining passive recreation sites and additional users through the expanded recreational amenities. The increased recreational capacity would be met both by the increase in number of fields and increased available play hours enabled by the use of artificial turf.

For further details, see Section 3.2 of the EA regarding the fees, and 4.9 of the EA regarding recreational resources.

**Concern 3: A sports complex is not needed and will reduce the amount of open space. This is not the right type of project for this location to meet the needs of the community.**

*Response:* There is a documented need in Middlesex County for expanded and updated active recreation resources for its growing and diversified residents. This need was identified through public engagement resulting in Middlesex County developing the Middlesex County Open Space and Recreation Plan (OSRP). The OSRP gathered input from over 1,800 residents, highlighting a strong demand for more recreational facilities (see pages 10-16 of the OSRP for details).

Middlesex County considered various locations for increased recreational facilities within the park system. Since other parks large enough to accommodate these facilities are conservation-focused, the County determined that upgrading the existing recreation facilities at Thomas A. Edison Park would have the least impact on the park system overall.

Thomas A. Edison Park has been sports-focused since its inception in 1964. While the proposed action would update the Program of Use to reflect the new facilities, the public park and recreation purpose for which it was conveyed will remain unchanged. The proposed action was developed as part of the OSRP to meet both current and future recreational needs in Middlesex County for its expanding and diversified residents.

The proposed action provides the greatest recreational opportunities within a compact development footprint, thus minimizing changes to the existing landscape. The number of fields would increase from 9 to 14, impacting 11 acres of currently undeveloped park land. This expands the developed parkland from 77 to 88 acres, leaving 89 acres unchanged. While there would be more sports fields in the northern portion of the park, there would still be areas for unprogrammed activities, such as grassy areas, walking paths, and nature enjoyment. The County's proposed changes aim to enhance both active and passive recreational opportunities, aligning with the needs identified in the Environmental Assessment (EA) for Middlesex County.

The NPS does not have the authority or responsibility for implementation of those changes to the park or the associated facilities which are solely within the County's authority to address as part of its management and maintenance of its parks. Section 2 of the EA covers further detail on the purpose and need, and Section 4.9 covers open space.

**Concern 4: This project will result in the loss of passive recreation including birding, walking trails, and child play areas that contribute to the quality of life of non-sports-oriented users.**

*Response:* Passive recreational opportunities currently available at the park will remain accessible after the renovation. In response to input from local conservation organizations, the County made additional efforts to preserve passive recreational opportunities, including birding, walking trails, benches, child play areas, and unprogrammed spaces.

Out of the park's overall 177 acres, 89 acres will remain untouched by the proposed action, ensuring that passive recreation activities in these areas continue unchanged. Existing walking trails through the woods will be preserved and enhanced with better connections to neighboring properties, including the college.

Within the 88-acre developed portion of the park, the renovation will replace the winding walking trails currently traversing the playing fields with new winding trails that circumnavigate these fields, connecting to trails in the undeveloped portions of the park and surrounding area. Following discussions with local organizations, additional walking trails and benches have been added to the latest design. While the pathways between fields will become more rectilinear, they will still be lined with grass, trees, and benches, offering opportunities for passive enjoyment of nature. Grassy spaces will continue to exist between various fields, such as near the cricket, tennis, track and field, and baseball areas, as well as to the west of the multisport fields. In response to feedback from local conservation groups, more than three acres of successional meadow will be incorporated into the design for birding, an increase from the originally planned one acre. Exercise stations and a children's playground are also included in the redevelopment plans.

Regarding birding, trees are planned throughout the park, along the winding trails and paths between fields. Although the birding experience in the developed areas might look different than it does today, residents will still be able to participate in birding in the park. Further, the birding experience will remain unchanged in the over 40 acres of woodland that will remain unchanged in the park.

While the passive recreation experience may change, activities will remain available within the park. Thomas A. Edison Park has always been a sports-oriented facility. While passive recreation is accommodated in the park, these activities have traditionally occurred "between" sports facilities and in undeveloped portions of the park, a setup that will be preserved in the renovated design. See Section 4.9 covers Open Space and Recreational Facilities, and Section 4.7 on Wildlife and Wildlife Habitat.

**Concern 5: The public has not been adequately engaged in the park planning and there has been a lack of County action seeking public approval.**

*Response:* Middlesex County has actively engaged the public and sought input throughout the park planning process. From 2018 to 2020, the County conducted a comprehensive public outreach campaign to inform the Destination 2040 Strategic Plan, specifically the Open Space and Recreation Plan (OSRP). This campaign involved over a dozen meetings and an extensive online survey, engaging 1,882 residents. The outreach included innovative approaches such as the "Set the Table!" initiative, which combined civic dinner parties with collaborative forums, along with more traditional methods of collecting public input online and in person to gather diverse community perspectives.

Following publication of the OSRP, Middlesex County continued to involve the public and worked to implement the goals set through the initial engagement process and planned the specific program and design for Thomas A. Edison Park. This continued engagement included consultations with many of the public individuals and user groups involved in developing the OSRP and CIO vision. Broader public engagement also occurred through the New Jersey Green Acres Public Hearing on March 29, 2023, and coordination with the New Jersey Department of Environmental Protection (NJDEP). In 2024, additional meetings were held with local organizations to clarify the project and gather further input.

Middlesex County has received strong informal support from many existing sports-oriented users and institutions throughout the planning process. The County recognizes that there has also been opposition from conservation-focused individuals and groups. The County has taken all of this input into account in order to balance these perspectives with the broader needs of County resources and the health, welfare, and opportunities for all residents.

The County is interested in continuing to hear from the public outside of the limitations of this EA, as they are in all endeavors. There is a "contact us" portal on the county website where individuals may raise concerns or submit suggestions on this or any matter of concern to the general public, and the county encourages people to make use of it.

Further detail is provided in Appendix D – Middlesex County Public Involvement.

**Concern 6: Artificial turf is bad for the environment and human health, unsustainable, and has a higher risk of personal injury to athletes and results in extremely high playing surface temperatures (heat islands) and exposure to PFAS.**

*Response:* The final decision to amend the POU is made by the NPS based on consistency with the park and recreation purposes for which the property was conveyed and the terms of the deed. The NPS does not have the authority for implementation of those changes to the park or the associated facilities which are solely within the County's authority to address as part of its management and maintenance of its parks.

The County shares concerns about environmental and human health impacts and selected artificial turf as it aligns best with the project's goals while minimizing overall impact. The primary consideration was

preserving as much undeveloped land as possible. Artificial turf allows for a compact layout, maximizing playable hours in a limited space. In contrast, natural grass would need significantly more acreage to provide the same usage due to maintenance and weather-related closures, potentially impacting more natural areas, including woodlands and wetlands.

Regarding health concerns, the County is committed to using environmentally safe turf. The decision relies on current EPA guidelines and studies, which have extensively researched crumb rubber infill used in artificial turf (U.S. EPA & CDC/ATSDR, 2024). These studies indicate that crumb rubber infill does not pose an increased risk to the environment or human health, with levels of potential contaminants similar to background environmental levels. Additionally, the EPA is setting new standards to prevent the introduction of PFAS into the environment, and while the turf industry is widely shifting their products away from any use of PFAS, the County is ahead of regulations by requiring turf materials to meet stringent PFAS certifications that use EPA testing methods, ensuring PFAS chemicals are not intentionally used in the manufacturing process.

The County also recognizes the heat island effect associated with artificial turf. To mitigate this, the design includes strategic planting of trees around the fields to provide shade and cooling for both players and spectators.

In conclusion, while the County understands the concerns around artificial turf, the decision was made based on a comprehensive evaluation of environmental impact, usability, and durability. Artificial turf provides a reliable, all-weather playing surface that requires less maintenance and offers more consistent availability than natural grass, which can be frequently closed due to rain and overuse. This choice enables a more compact and efficient use of space, supporting the County's goal of providing high-quality recreational facilities with minimal environmental footprint.

See Section 3 for a detailed explanation of the proposed alternative.

**Concern 7: Too much of the wetlands, green space, and trees, are being removed, compromising the natural environment and bucolic esthetics of the park.**

*Response:* Wetlands, green space, and tree cover were part of the analysis of the site development, and the proposed design is a result of the effort to minimize impacts to wetlands, green space, and trees. The project has been carefully designed to locate sports fields in a consolidated arrangement on the northernmost portion of the property. This layout specifically avoids impacting wetlands while providing maximum recreational opportunities within the most compact development footprint, thereby minimizing the conversion of the existing landscape. This layout has been approved by the NJDEP in the Freshwater Wetland General Permits 7 and 11. While the concentrated approach does change the landscape of the northernmost 88 acres, only 11 acres of previously undeveloped land will be converted to active use, leaving the remaining portion of the 177-acre site largely untouched.

Within the 88-acre area undergoing renovation, although there will be a proportionally larger area dedicated to sports fields than currently exists, considerable effort has been made to integrate planting, trees, and landscaping throughout the project, including between and around the fields. In the vicinity of the cricket field and playground, significant green space has been designed, featuring berms and groves of trees to enhance the natural experience. While some walking paths will be more rectilinear than the previous winding paths, their overall length will be increased, ensuring they are available at all times for passive enjoyment of the park.

Importantly, the project was developed as part of the Open Space and Recreation Plan (OSRP) to meet current and future recreational needs in Middlesex County. Thomas Edison Park was selected due to its existing role as the most active recreation and sports-oriented park in the County. In response to concerns previously raised by a local conservation group, additional walking trails, landscaping, planted trees, and a successional meadow of over 3 acres (expanded from the originally planned 1 acre) have been included in the latest design to help offset development and land-use changes.

It is also important to note that the park is located on the former Raritan Arsenal grounds, which were heavily developed for military use up until 1964. The existing wooded areas are the result of successional growth from the landscape trees left after the park's initial development, not an old-growth forest. This history is further detailed in Section 4.2 of the EA, with updated maps illustrating the limited tree cover on the property from the 1930s through the 1970s.

For additional detail see Sections 4.2 on Terrestrial Vegetation, Section 4.4 on Wetlands, and Section 4.10 on Visual Resources.

**Concern 8: There will be negative impacts to local biodiversity, including all forms of wildlife, nesting birds, and the environment.**

*Response:* The proposed action is needed, not only to meet the County recreational needs, but specifically due to the lack of stormwater management and the associated impacts on its current uses, as detailed in the Environmental Assessment (EA) Section 3.2. While the County acknowledges that any major renovation to address the stormwater issues will have environmental impacts, including on wildlife and nesting birds that currently inhabit the park, efforts have been made to minimize these effects. The County has worked closely with the New Jersey Department of Environmental Protection (NJDEP) and the U.S. Fish and Wildlife Service, adhering to their strict environmental and endangered species protections.

Environmental impacts for the proposed park redevelopment were first identified in the EO215 Environmental Impact Statement, which was prepared for and approved by the NJDEP. Further coordination with the U.S. Fish and Wildlife Service during the Environmental Assessment process confirmed that no threatened or endangered species would be impacted by the project. The NJDEP has subsequently determined that all environmental impacts have been minimized and, as a result, issued all permits necessary for the renovation. Additionally, in compliance with the USFWS clearance letter, tree disturbance will be avoided during the nesting season.

While there may be temporary impacts on common small mammals and birds, and short-term biodiversity changes during construction, it is generally expected that these animals and birds will relocate to nearby areas during the construction phase and are likely to return to the park once the renovation is complete.

For additional detail see Sections 4.2 on Terrestrial Vegetation, Section 4.7 on Wildlife and Wildlife Habitat.

**Concern 9: Stormwater and flood plain issues are not adequately addressed in the design.**

*Response:* Stormwater and floodplain improvements were a major focus of this project. Currently, there is no stormwater management system in place at the park, leading to numerous issues, including unusable fields after heavy rain events. To address the stormwater issues, a comprehensive renovation and re-grading is needed.



The new design effectively addresses these existing stormwater challenges. A modern stormwater management system has been developed in compliance with stringent NJDEP permitting requirements, which mitigates flooding and stormwater management issues that have long affected the park. The project was also evaluated for compliance with the Flood Hazard Control Act. It considered the presence of 100- and 500-year floodplains within the project's limits. After thorough review, NJDEP determined that the design conforms with all regulations and approved it as part of the NJDEP Land Use Plan and NJDEP NJPDES General Permit 5G3.

By incorporating comprehensive stormwater management and floodplain mitigation measures, the design not only resolves long-standing issues but also enhances the park's resilience to future weather events. This ensures a sustainable and functional park environment for all users. See Section 4.5 Water Resources for an in-depth explanation of the stormwater system.

**Concern 10: There will be an influx of traffic, congestion, increased noise and pollution from traffic with no accommodations.**

*Response:* Traffic studies completed for the park redevelopment project concluded that it would have no impact on the traffic conditions within the project area. The project will include a 1,350-space parking lot with overflow parking available at Middlesex College to meet the anticipated parking needs of the park users. The limited volume of traffic increase does not meet thresholds for analysis of increased pollution, it is predicted to be very similar to the traffic that occurs at the park currently. The traffic study was conducted to be inclusive of Mill Road, which is currently a main access point for Heller Industrial Park, and it was determined that the increased traffic would not impact existing conditions and existing conditions do not impact the park access.

Given the limited impact of traffic, the topic is not deeply discussed in the EA, however a detailed analysis of Traffic impacts are included in Technical File 1 – EO 215 - EIS Submitted 053023, Section 4.9 Traffic and Appendices B, C and D containing the full traffic study data.

The County recognizes the concern and will continue to monitor the traffic conditions. In the event that traffic become an issue, the County remains open to further evaluation and will address traffic needs as they arise.

**Concern 11: Many commenters expressed concern that the park has been closed despite there being no current construction. In addition, commenters expressed frustration with the lack of communication and difficulty of finding information regarding the park closure.**

*Response:* Thomas A. Edison Park was closed in late 2022 to facilitate the relevant environmental testing and permitting processes laid out by NJDEP. While all fields, comfort stations, walking paths, parking lots, tennis courts, etc., are currently inaccessible to the public, Thomas A. Edison Park Model Airplane Field located in the southern section of the park is not impacted and remains open to the public. The Park remains closed due to safety concerns associated with open test pits and other disruptions to park infrastructure. As a result, Edison Park will remain closed to avoid any impact on any future work needed and for the safety of the community.

**Concern 12: Commenters expressed concern that the proposed action would create an increased burden on emergency services.**

Response: EMS needs of the park will not impact the emergency services of the municipality. Emergency services are currently and will continue to be provided to users of the Thomas A. Edison Park by the Township of Edison.

Given the anticipated limited impact on emergency services, the topic is not deeply discussed in the EA, however a detailed analysis of emergency services impacts are included in Technical File 1 – EO 215 - EIS Submitted 053023, Section 4.3 Community Services and Facilities, which concluded that there is no appreciable impact on emergency services as a result of the renovation.

**Concern 13: Why can't the acreage of the Thomas A. Edison Park be utilized for a separate action, like a school campus. What other alternatives were considered?**

Response: The NPS did not receive a request by the County nor consider the option of siting a school campus at the Thomas A. Edison Park. This property was conveyed for park and recreation use only other uses are not permitted under the deed conditions. The intent of the renovation project is to improve and expand on existing and current uses, essentially to take a public park with heavy sports programming, meet all of the needs established for the project as defined in the EA in Section 2.0 (Fulfilling Deed Requirements and Strategic Goals, Addressing Insufficient Capacity for Activities, Increased Diversity of Sporting Options, Improving Deteriorating Park Infrastructure, Address Climate Resilience and Sustainability). It was never considered to change the current programming or use of the park beyond expansion or improvement of the current use because the FLP property was conveyed for only park and recreation use Besides the no-action (existing conditions) option, no other options were considered for the park.

**Concern 14: Multiple commenters asked whether other alternatives were considered and/or identified that would meet the needs of expanding the active recreation in the park, including cricket fields, without adversely affecting the passive recreation in the park.**

*Response:* No other alternatives that effectively meet the need for expanded active recreation were considered because the current design was specifically developed to fulfill this requirement in the most efficient way possible. The design strategically consolidates active recreation areas, such as cricket fields, to minimize the footprint and impact on the undeveloped portions of the park. This approach ensures that all existing forms of passive recreation, such as walking trails, birding, and open green spaces, are preserved and available to park users, thereby balancing both active and passive recreational needs.