



United States Department of the Interior

NATIONAL PARK SERVICE
NORTHEAST REGION
15 State Street
Boston, Massachusetts 02109-3572

IN REPLY REFER TO:

March 8, 2012

Mr. Thomas B Gentz, President
Town Council
Town of Charlestown
4540 South Country Trail
Charlestown, RI 02813

Dear Mr. Gentz:

Reference: Portion, Charlestown Naval Auxiliary Landing Field, "Ninigret Park"
Charlestown, RI
GSA Control Number N-RI-469B, I-RI-492

It has come to our attention that the Town of Charlestown may be contemplating construction of a lighted football stadium at Ninigret Park. We wish to bring to your attention that Ninigret Park was deeded to the Town in 1981 by the U.S. Department of the Interior acting through the Heritage Conservation and Recreation Service, the predecessor of the National Park Service's Federal Lands to Parks (FLP) Program. That deed stipulated, among other things, that:

The property shall be used and maintained exclusively for the public purposes for which it was conveyed in perpetuity as set forth in the program of utilization and plan contained in the Grantee's application submitted by the Grantee on October 30, 1979 as amended by letter with attachments dated February 7, 1980, which program and plan may be amended from time to time at the request of either the Grantor or Grantee, with written concurrence by the other party, and such amendments shall be added to and become part of the original application.

While a lighted football stadium is certainly a recreational use, a project of this scope was not contemplated when the property was deeded. In order to amend the program of utilization and move forward with the project, the Town will have to accurately describe the project, including how the facility will be used and how it fits with other amenities at the park and resources both within and surrounding the park. We are very concerned about the close proximity of the park to the adjacent Ninigret National Wildlife Refuge.

From there the town must prepare an assessment of the environmental effects of potential impacts of the proposed recreational use in accordance with the National Environmental Policy Act (NEPA). Enclosed is a copy of an Environmental Screening Form which will start the NEPA process. (An electronic copy of the form has also been provided.) The purpose of ESF is to identify potential impacts to a variety of resources. The person(s) who prepare the form should be familiar with the

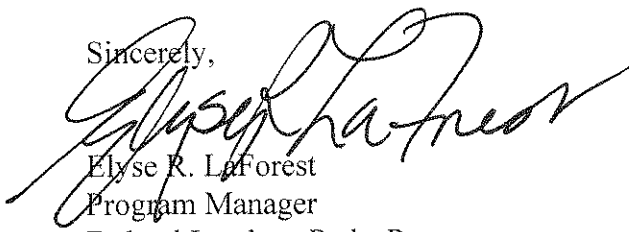
site and have adequate background to address the various issues/resources identified. The resulting ESF will determine the level of environmental documentation which must be done to continue the project.

The town should concurrently evaluate the proposed use of the field, if it is determined that building a lighted football stadium is an environmentally acceptable use of the site. Our guidelines allow for public park and recreational use. Highly specialized and developed facilities occasionally cross the "line" toward "commercial use." This is a hard "line" to articulate. The recreational audience, the "intensity" of the recreation and the level of funds generated by a site may or may not qualify as commercial. (For example: a public beach or a public pool are acceptable recreational uses; a water park would be considered a commercial activity.) Funds generated by a FLP park must be used for recreation, with the FLP site taking precedence for development, maintenance and operation prior to funds being diverted to other recreational uses.

Additionally, we are concerned about what appears to be a change in the way Ninigret Park relates to the adjacent wildlife refuge. It was always contemplated that the town "parcel" of property transferred would be used "consistently" with the property transferred to the Fish and Wildlife Service (FWS). Until recently, it appeared the park and the refuge were respectful neighbors. The community's recent proposal (December, 2010) to erect three wind turbines directly on the border of the refuge with seemingly little consultation with FWS was problematic. Wind turbines are not considered a recreational use of the property and the request was denied. (Copies of the correspondence are attached.) The construction of a lighted field directly adjacent to the refuge also seems to be a potential conflict.

Please feel free to call me to discuss the project, the process of environmental review or any concerns you may have regarding recreational/commercial use of the site. A conversation early in the project may be of benefit to all concerned. My phone number is (617) 223-5190. My email is elyse_laforest@nps.gov.

Sincerely,



Elyse R. LaForest
Program Manager
Federal Lands to Parks Program

Enclosures

Cc:

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