



RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767 TDD: Dial 711

November 12, 2008

Ms. Diane Kelley
Regional Brownfields Coordinator – Region 1
U.S. Environmental Protection Agency (Mail Code: HIO)
One Congress Street, Suite 1100
Boston, MA 02114-2023

RE: FY 2009 Brownfields Assessment Grant – Coalition Assessment

Dear Ms. Kelley:

On behalf of the Rhode Island Department of Environmental Management (“RIDEM”), enclosed is a proposal for US Environmental Protection Agency (EPA) FY 2009 Brownfields Assessment Grant funding for hazardous substances for use on a *community wide* basis. RIDEM is the proud recipient of a 2007 and 2008 assessment grant covering seven communities in Rhode Island. This year we are pleased to be partnering with three municipalities – Central Falls, Pawtucket and Cumberland – in an effort to obtain Coalition Assessment funding for FY 2009. (*Hereafter, these three communities will collectively be called “Coalition Partners.”*) The attached proposal for \$1 million in Coalition Assessment funding aims to provide our three Coalition Partners with a total of \$600,000, with the remainder to be made available for statewide assessments.

RIDEM recognizes the increased challenges that all municipalities face, and the importance of transforming brownfields sites into productive properties to provide both immediate and long-term economic and environmental benefits. Through the information presented in this application, we hope it becomes clear that the successful relationships RIDEM’s brownfields program has fostered with municipalities are real, measurable and highly valued by the entire brownfields redevelopment community in Rhode Island. The funding RIDEM has been able to provide to communities for brownfields assessments has helped eliminate public health concerns, create new greenspace and recreational opportunities, and provide new jobs and housing for local residents. However, there is still a great unmet funding need for assessment work in numerous Rhode Island communities that are working diligently to revitalize one of their most limited resources – clean and usable land.

Our Coalition Partners are contiguously located on the historic Blackstone River. Having played a central role in the Industrial Revolution, these three communities are home to numerous abandoned, distressed, and underutilized properties and neighborhoods. The major issue inhibiting redevelopment and reuse of these sites is the lack of a complete understanding of the various environmental problems that may exist. The future economic prosperity of these communities is contingent upon the reuse and redevelopment of brownfields sites. Our Coalition Partners have already successfully collaborated and formed a strong coalition formally called the Tri-Communities Coalition, concentrating on the Broad Street Regeneration Planning Initiative, the later of which is supported by a National Park Service grant and culminating in the development of the Broad Street Action Plan (currently in draft form and intended to be finalized before the end of 2008). This assessment grant is a critical component of successfully implementing the Broad Street Action Plan for our Coalition Partners. While the majority of the funding from this proposal will benefit our Coalition Partners, RIDEM acknowledges the continuing assessment needs of brownfields sites in other Rhode Island municipalities, and as such, is proposing to utilize the remaining \$400,000 for continued assessment work across the state.

RIDEM worked closely with all Coalition Partners to prepare this proposal and we strongly feel it adequately represents the critical assessment needs of each partner. A total of 12 letters of solid support were received (see Appendix A).

The following is the specific information requested in the proposal guidelines:

- a. **Applicant Identification:** RI Dept. of Environmental Management, 235 Promenade Street, Providence, RI 02908
- b. **Funding Requested:** i) Grant Type: *Coalition Assessment* ii) Amount: \$1,000,000
iii) Contamination: *Hazardous substances* iv) Scope: *Community Wide*
- c. **Location:** RIDEM selected three communities in Rhode Island as Coalition Partners: the City of Central Falls, the City of Pawtucket and the Town of Cumberland (see Appendix B for letters of commitment). All Rhode Island municipalities will be eligible for a smaller portion of the funding as well.
- d. Not a site-specific proposal, therefore, not applicable.
- e. **Contacts:**

i) <u>Project Contact:</u>	ii) <u>Chief Executive:</u>
Cynthia M. Gianfrancesco, Principal Environmental Scientist RIDEM - OWM 235 Promenade Street, Providence, RI 02908 Ph: (401) 222-4700 (x7126) / Fax: (401) 222-3812 Cynthia.Gianfrancesco@dem.ri.gov	W. Michael Sullivan, PhD, Director RIDEM 235 Promenade Street, Providence, RI 02908 Ph: (401) 222-2771 / Fax: (401) 222-6802 Michael.Sullivan@dem.ri.gov

- f. **Date Submitted:** November 12, 2008 (via US Mail) or earlier
- g. **Project Period:** Three years from date of Cooperative Agreement with EPA (10/1/09 – 9/30/12)
- h. **Population:**

Entity	Population *
City of Central Falls	18,928
City of Pawtucket	72,958
Town of Cumberland	31,840
State of Rhode Island	1,048,319

* From the RI Economic Development Corporation RI Databank – 2000 Census data.

Please contact me if you have any questions or need further information concerning this proposal. We look forward to a successful partnership with EPA and our Coalition Partners in years to come. Thank you.

Sincerely,



Cynthia M. Gianfrancesco
Principal Environmental Scientist
Rhode Island Department of Environmental Management

cc: Don West, Environmental Management Support, Inc.
City of Central Falls
City of Pawtucket
Town of Cumberland



EPA Brownfields Assessment Grant FY 2009 – Coalition Assessment RI Department of Environmental Management

THRESHOLD CRITERIA FOR ASSESSMENT OF GRANTS

1. Applicant Eligibility: The Rhode Island Department of Environmental Management (“RIDEM”) is a government entity created by the Rhode Island General Assembly and is eligible to apply for funding through EPA’s Brownfields Assessment Grant Program. RIDEM’s enabling statute can be found at R.I. Gen. Laws Chapter 42-17.1. Central Falls, Pawtucket, Cumberland and all municipalities in Rhode Island are legally established general purpose units of local government and are eligible under EPA’s Brownfields Assessment Grant Program.
- A. Letter from State or Tribal Environmental Authority: Not required. Applicant is the Rhode Island state environmental authority (RIDEM). Implementation by RIDEM will ensure efficient compliance with state regulations and will facilitate interactions with other state programs to support redevelopment.
- B. Site Eligibility and Property Ownership Eligibility: This is an application for Community-wide assessment funding, therefore information on site eligibility is not necessary and has not been included. Eligibility determinations will be made on a site-by-site basis, subject to EPA review and approval, as sites are identified.

RANKING CRITERIA FOR ASSESSMENT GRANTS

1. Community Need

1.a.i Health, Welfare and Environment – Number, Size and Impacts of Brownfields

The three Rhode Island communities showcased in this proposal, have long and interesting histories – unique to each community, yet intertwined by a decline in quality of life due to faltering economic prosperity, environmental blight, and forever connected by a common main thoroughfare known as Broad Street. Three miles in length, it is commonly called the Broad Street corridor.

The communities of Central Falls, Pawtucket and Cumberland are all ideally situated along the historic Blackstone River in Northeastern Rhode Island. Rich in economic and cultural history, all are considered part of Rhode Island’s urban core and were part of the soul of the American Industrial Revolution beginning in the late 1700’s. America’s first textile mill could have been built along practically any river on the eastern seaboard, but in 1790 the forces of capital, mechanical know-how and skilled labor came together in Pawtucket, Rhode Island where the Blackstone River provided the power that kicked off America’s drive to industrialization. In 1790, Samuel Slater, a defector from the English mills, came to Pawtucket, Rhode Island with the knowledge of the closely guarded workings of cotton textile manufacturing machinery. Samuel Slater set up shop at the now famous Slater Mill along the Blackstone River and commenced spinning cotton full time – this is known as the flashpoint that began the American Industrial Revolution.

As this new type of industry caught on, by 1810 it was said that there was “probably no spot in New England ... in which the same quantity or variety of manufacturing business is carried on” (RI Historic Preservation Commission, 1978, 1998) as there was in Pawtucket, Rhode Island. As industry boomed, the construction of dense neighborhoods of single and multi-family housing, as well as commercial and institutional buildings, began lining the street. By 1870, more than 100 buildings existed along the Broad Street corridor. Between 1875 and 1920, the communities’ populations more than tripled, largely due to immigration (60 percent of the residents were either born abroad or had immigrant parents). Today, this melting-pot is being joined by immigrants from Latin America, the Caribbean and Africa.

Since the mid-1900's, the Broad Street corridor has suffered from years of neglect, and the underserved populations and infrastructure is at a tipping point. As outside investment is slow to trickle into these communities' main street, small entrepreneurs have been trying to eek out a subsistence living from this urban streetscape. From the domestic industrial collapse in the 1960's and 70's which destroyed the streets manufacturing base, to the suburban mall and vehicular oriented development in the 1980's and 90's which decimated the walkable, multi-use main street, Broad Street has been hit hard by 40 years of economic neglect.

Our Coalition Partners have identified approximately 90 potential brownfield sites in the target area representing over 100 acres, and have prioritized 18 of the sites representing over 32 acres of land. The brownfields along Broad Street itself in Central Falls, Pawtucket and Cumberland take many shapes – from small vacant lots to larger abandoned mill complexes – and their presence is a major impediment to revitalization. The types of industry/businesses commonly found along the corridor have included automotive shops, gas stations, restaurants/bars, and former heavy manufacturing all scattered between numerous vacant lots.

Environmental Impacts	<ul style="list-style-type: none"> Historically, numerous contaminants have been identified in these areas, including heavy metals, PCBs, chlorinated volatile organic compounds, semivolatile organic compounds, and petroleum. Due to the fact that many of these sites are adjacent to/upgradient from the Blackstone River, water quality impacts to the Blackstone and Narragansett Bay are continuous. Diminished fisheries/recreational resources for the Broad Street corridor residents due to pollution and blight; impaired scenic and recreational value of river. Impacts to groundwater, surface runoff and migration of contaminants to neighboring properties; biological/physical/ chemical risk associated with contaminated sites (both large & small sites).
Social/Welfare Impacts	<ul style="list-style-type: none"> Impaired community/public safety. Decreased quality of life due to the presence of run-down, underutilized properties. Decreased number of affordable housing units Decreased number of local jobs within the community. Impaired local minority business growth. Impaired streetscape & unsustainable traffic/parking management strategies. Decrease in civic pride, resident voice and municipal participation.
Public Health Impacts	<ul style="list-style-type: none"> A growing number of abandoned and deteriorated sites/structures that pose clear health and safety risks for community residents. High asthma due to local air quality issues; high lead due to paint and soil exposure Ever-present exposure pathways (e.g. vapor intrusion, dermal contact). Contact with impaired waters in the Blackstone River.

The neighborhoods surrounding the Broad Street corridor are very dense, with an average density of 12,400 people per square mile compared to 1,003 for the State of Rhode Island, which increases the potential for contaminant exposure to area residents. The Broad Street corridor is also intersected by the Blackstone River, and is part of the John H. Chaffee Natural Heritage Corridor. Many of the corridor brownfields are paved, impervious areas whose runoff ultimately finds its way into the Blackstone River. Similarly, groundwater leaches pollutants into the river. The cumulative effects of these brownfields have an adverse impact (biological, physical or chemical) on the quality of the Blackstone River.

Statewide, the actual number of brownfields is unknown. What is known, however, is that the type of environmental, social and health impacts identified above in the Broad Street corridor are real and felt in all Rhode Island cities and towns. Communities across Rhode Island have received national recognition for their remarkable physical and economic revitalization. However, many pressing challenges continue to exist for this "Smallest State in the Union" – the pressing need to develop affordable housing, sustainable growth management, bringing underutilized sites back to productive reuse, and preserving the state's historic and cultural resources. If the growing demand placed upon RIDEM for assessment funding is indicative of the size and scope of the brownfields challenges across Rhode Island, this funding will be of tremendous value to the many municipalities and property owners vying for much-needed assessments.

1.a.ii Health, Welfare and Environment – Health and Welfare of Sensitive Populations

The sensitive populations of the targeted areas within the Broad Street corridor, especially minorities and children, are disproportionately impacted by environmental blight. Pawtucket, Central Falls and the Valley Falls section of Cumberland can be characterized as old industrial centers. Broad Street has historically been a place where immigrant working families have established themselves to either work in the area’s manufacturing businesses or open small mom-and-pop stores and restaurants that serve the neighborhood. As each generation moved on to live and work outside of the corridor, an influx of new immigrants occurred. Successive waves of immigration have led to English, French, Portuguese, Irish, and now Hispanic populations making their home in and around Broad Street. As a result, Broad Street is home to a disproportionate amount of Rhode Island’s minority residents. The percentage of minority population residing along the Broad Street corridor is more than twice the minority population for the State of Rhode Island. In particular, the “minority” population within Central Falls represents a majority.

	Central Falls	Cumberland	Pawtucket	Corridor	Rhode Island
Population	18,928	31,840	72,958	19,332	1,048,319
Minority Population	11,361	1,625	22,474	7,577	189,654
% Non White	60%	5%	31%	39%	18%
Env. Justice Community	Yes	No	Yes	N/A	N/A

Source: 1) US Census 2000; and 2) RIDEM’s “Policy for Considering EJ in the Review of Investigation and Remediation of Contaminated Properties (July 2008 draft) as found at: www.dem.ri.gov/envequity/index.htm

The Rhode Island Kids Count reports that the percentage of women with delayed prenatal care is higher in Central Falls and Pawtucket (15.8 and 13.5 percent, respectively) than in the State of Rhode Island (10.7 percent). These figures suggest limited access to healthcare, which implies that health problems are more likely to go untreated.

The presence of brownfields causes a very real environmental hazard for children in the Broad Street corridor. The corridor’s older housing stock likely contains lead paint (most buildings built prior to 1978 contain lead paint), which puts younger children at risk. According to the 2000 US Census, approximately 80 percent of the homes in Rhode Island and over 90 percent of homes within the Broad Street corridor were constructed before 1979. Measures can be taken to protect children from lead hazards, however, the presence of vacant/underutilized brownfields sites compounds the risk by providing unsupervised areas where lead hazards may exist within the buildings. In 2006, Rhode Island had the second highest percentage (among 34 comparable states) of children under the age of six with a confirmed elevated blood lead level. In 2006, the rate of lead poisoning for children under age six in Rhode Island was 2.4 percent, compared to 1.2 percent in the U.S. (Source: Rhode Island Kids Count www.rikidscount.org) The table below illustrates that both Pawtucket and Central Falls especially, have relatively high percentages of children with elevated blood levels.

	Central Falls	Cumberland	Pawtucket	Rhode Island
% of Children with Elevated Blood Lead Levels	6.7	1.4	4.7	4.6

Source: Rhode Island Kids Count www.rikidscount.org

Residents in older urban cores, like the Broad Street corridor, can also be exposed to environmental hazards like airborne pollutants, which result from traffic congestion, more frequently than residents in suburbs and rural areas. As illustrated below, environmental problems like asthma are more prevalent within Pawtucket and Central Falls.

	Central Falls	Cumberland	Pawtucket	Rhode Island
Rate of Asthma Hospitalizations Per 1000 Children	6.8	2.1	5.0	4.0

Source: Rhode Island Kids Count www.rikidscount.org

In Rhode Island, 11 percent of children ages birth to 17 years reported having asthma between 2001-2005. Only four states report higher current asthma prevalence rates. (Source: Rhode Island Kids Count www.rikidscount.org)

1.b.i Financial Need – Economic impact of Brownfields

The economic impact of numerous brownfields along the Broad Street corridor can be felt throughout the fabric of the community. The far reaching effect of brownfields on the economic viability of the community has resulted in a depressed area, where absentee landlord, drugs, crime and prostitution are rampant. It wasn't always that way, however.

In the late nineteenth century, Pawtucket had a thriving cosmopolitan downtown and the surrounding Pawtucket and Central Falls and Valley Falls neighborhoods, including Broad Street, were home to the areas elite and wealthy. In the late 1950's, however, as was the case in many cities across the United States, these cities experienced an economic decline that was influenced by suburbanization, competition from southern textile mills and the construction of Interstate 95. Rail service to the Pawtucket/Central Falls Train Depot was discontinued in 1971 and the 1980's saw the closure of the majority of the remaining retail establishments in downtown Pawtucket. The economic decline which has taken place since the 1950's has resulted in an inordinate number of vacant and underutilized properties, especially along the Broad Street corridor which connects these three communities, and the nature of the neighborhoods began to change. There was no longer a vibrant mix of residential, employment and shopping opportunities, but block after block of vacant and rundown commercial and industrial buildings intermixed with neglected Victorian homes now converted to multi-family housing. The majority of buildings are well over 100 years old and in need of repair. Driving down the corridor, however, one may not notice the vacant lots and desolate buildings, but instead sees many small businesses who serve the local residents and a mix of uses that is attempting to remain sustainable.

As the area has continued to suffer from economic stagnation, all of Central Falls and part of the City of Pawtucket, including the Broad Street area, were recently designated Environmental Justice areas by RIDEM due to being within the top 15 percent of block groups state-wide for meeting the percent of the block group that is minority or percent of the block group that is low income (under 2X Federal Poverty Level).

According to the 2000 US Census, the Broad Street corridor and surrounding neighborhoods contain some of the lowest average annual household incomes in Rhode Island, at approximately 50 percent of the average annual household income of the state. Over one-third of the residents live below the poverty line, an overwhelming majority are renters and more than half do not own a car. These neighborhoods are also the least educated, where less than one-half of adults have completed high school and less than one-tenth completed college. Fixed income senior citizens, some who live in public housing, make up close to half of the area's population and over one-third of the population is Latino, compared to 8 percent statewide. The minority groups are disproportionately young, comprising over three quarters of the under-18 population. Finally, approximately 40 percent of the households in these neighborhoods do not speak English as a primary language.

The majority of the Broad Street corridor falls within the City of Central Falls. Central Falls is a city of one square mile, which has the densest population in the state and earning it the designation as one of the most densely populated cities in the United States. Central Falls residents' median household income is \$22,628 compared to the U.S. median of \$41,994, and 55 percent of residents of Central Falls live below the poverty line. The largest of the minority groups in Central Falls are those that are Hispanic or Latino and range from around 30 percent to nearly 75 percent of the residents along Broad Street. Only 14 percent of the Central Falls' population actually lives and works in the city. (Source: US Census 2000 Data; Community data provided by Coalition Partners)

Because of the city's lack of tax base and financial infrastructure, the Central Falls school system was turned over to the State's Department of Education to administer and maintain in the early 1990's. Since that time, the district has seen an alarming increase in students with more than normal academic needs. The city has also become a magnet for a largely transient population with a plethora of social ailments. This extreme need in education and low median incomes has

created a crime surge since the seventies. As compared with the current national average, robbery, burglary and larceny theft were lower in Central Falls; however, the average for all other crimes committed were higher (murder, rape, aggravated assaults and vehicle theft). Forcible rape was double the national average. (Source: Community data provided by Coalition Partners)

The following table provides a glimpse of the demographics which make up the Broad Street corridor. Central Falls and Pawtucket are well above the Rhode Island figures for the percent of children in poverty, the percent vacant housing units, and unemployment rate and well below the median household income. At first glance, the poverty indicators for Cumberland appear much less dire than Central Falls and Pawtucket. However, the Valley Falls section of Cumberland, which is the one that encompasses Broad Street in Cumberland, is much denser, more urban, older, and has more low income residents than the remainder of the Town. Specifically, the Valley Falls census tract as a whole is Cumberland's only low to moderate income tract. The population of Valley Falls is 60 percent low to moderate income. In these ways, Valley Falls is similar to Central Falls and Pawtucket. (Source: Community data provided by Coalition Partners)

Demographics	Central Falls	Pawtucket	Cumberland	Valley Falls (of Cumberland) (Census Tract 112)	Broad Street Corridor	Rhode Island
Population*	18,928	72,958	31,840	5,762	19,332	1,048,319
People per Square Mile*	18,929	8,386	1,188	4,390	8,191	1,003
Children in Poverty*	40.8	24.5	3.1	7.7	N/A***	16.5
% Non White*	60%	31%	5%	10%	39%	18%
% Vacant Housing Units*	40.4%	16.6%	12.0%	5.7%	26.8%	12.5%
Median HH Income*	22,628	31,775	54,656	35,054	25,660 (mean)	42,090
Unemployment Rate for 9/08**	12.0	10.3	7.1	N/A	N/A	8.8

* U.S. Census 2000 Data; **RI Dept. of Labor and Training Labor Statistics for Rhode Island Sept. 2008; *** N/A = not available.

The above data demonstrates that the key economic need of the residents in the Broad Street corridor is well paying jobs. The residents of the corridor suffer from high rates of unemployment, and those residents who are employed suffer from the low wages that their jobs pay. Our ability to secure funding through this brownfields grant will allow our Coalition Partners and the residents of the Broad Street corridor to begin implementing many of the key elements of the soon-to-be-finalized Broad Street Action Plan, one of which is business growth and the ultimate creation of better, higher paying jobs.

The situation present in the Broad Street communities is also present to a lesser degree throughout the state of Rhode Island. Old mill villages exist in each of the 39 municipalities in the state, as well as former industrial parks which were established, grew and expanded during the 1950's and 1960's, but have been in decline since the 1970's with the closure of military bases and loss of manufacturing facilities, first to the southern states and then overseas. Abandoned and underutilized former industrial properties can be seen when driving down nearly any road in Rhode Island. Rhode Island currently has the highest unemployment rate in the country and had been feeling the effects of the nationwide economic downturn long before the rest of the country. Rhode Island Governor Donald Carcieri recently asked the question "Why is Rhode Island always the first state to go into a recession and the last to come out?" While the rest of the country may be just entering a recession, Rhode Island has been a recession for several years. In Rhode Island, fewer and fewer brownfield properties are being redeveloped as more and more industrial properties are underutilized and abandoned each year. These brownfield properties are providing less of a tax base to struggling municipalities each year, resulting in municipal employee cutbacks, cuts to school budgets (hence, lower educational outputs) and cuts in

municipal services. Rhode Island had the highest home foreclosure rate in the country in 2006, and continues to have one of the highest foreclosure rates since that time, currently with the sixth highest foreclosure rate nationwide. While there are numerous reasons for the dire economic situation in Rhode Island, the presence of large numbers of brownfields and lack of funding to assess/cleanup these properties is contributing to the current fiscal crisis.

1.b.ii Financial Need – Other financial factors

All of the three municipalities are limited in their ability to draw on other sources of funding. State Aid to Cities and Towns has been cut for all municipalities in Rhode Island for the past several years. Pawtucket has received \$1 Million less this fiscal year in state aid. Central Falls' State revenue sharing was cut \$300,000 in the last quarter of last fiscal year which resulted in layoffs of fire, police and public works personnel and furlough days for remaining staff. Tax revenue has gone down in all communities due to an increase in the number of foreclosures and a decrease in the realty transfer taxes. There have been 500 foreclosures in the City of Pawtucket so far in calendar year 2008. Similarly, there have been approximately 140 foreclosed multi-family residences out of a total 6,000 residential structures in Central Falls in 2008. Pawtucket's school department is currently forecasting a \$4 million deficit for FY 2009. The communities are further constrained in their ability to raise funds by state law which imposes a property tax revenue cap and lowers the cap from 5.5 percent in 2006, to its current cap of 5.25 percent, to 4 percent by 2013. This, at a time when State Aid to Cities and Towns has been reduced several years in a row, and when expenses are ever increasing, has resulted in cuts to all municipal programs and the inability to allocate funding to brownfields. While the City of Pawtucket has received EPA Brownfields Cleanup Grants in the past, it has over 90 known contaminated sites on over 200 acres of land, which is approximately three percent of the total land area in Pawtucket. Given Pawtucket's limited financial resources, it is not possible for the City to fund the assessment and cleanup of all of these properties. Very similar situations exist for all our Coalition Partners.

The State of Rhode Island's fiscal condition has been deteriorating on a yearly basis for the past several years due to revenue shortfalls and inflation, causing the State deficit to increase to over \$400 million in fiscal year 2009. Rhode Islanders currently pay some of the highest taxes in the country, ranking 10th highest nationwide in state income tax at 10.2 percent (above the national average of 9.7 percent), and 7th nationwide in property tax. With just over one million residents, Rhode Island does not have the tax base to make up existing budget shortfalls without impacts being felt statewide. The resulting State budget cuts included budget reductions to all state agencies, including RIDEM, as well as cuts to all municipalities. In addition, the state of the State and national economy, and the recent elimination of the State Mill Tax Credits, which since 2001 helped spur assessment, cleanup and redevelopment of the numerous abandoned mills in the State, has resulted in the withdrawal of numerous developers from redevelopment projects, once again leaving these old mills sitting dormant. As such, the State does not have the ability to fund brownfields projects, and relies on EPA brownfields grants to assist municipalities, tribes and non-profit organizations in Rhode Island.

Currently, Rhode Island has a great unmet funding need for assessment work in numerous communities. RIDEM has over 20 Targeted Brownfields Assessment (TBA) applications on file awaiting funding, with 10 ongoing TBA projects. The current funding for fiscal year 2009 for the TBA program, which includes \$100,000 annually from our 128(a) grant, plus past Brownfields Assessment Grants RIDEM has received (see section 2.c.1), will allow only 7 of the 20 applications currently on file to be chosen for funding this year. Each year, RIDEM receives more and more TBA applications, as municipalities become aware of the success of the RIDEM Brownfields Assessment program and are looking for assistance to encourage redevelopment in their communities. This grant is crucial to ensuring that the momentum of RIDEM's TBA program and the Broad Street Regeneration Planning Initiative continues.

2. Project Description & Feasibility of Success

2.a Project Description

RIDEM's selection of our Coalition Partners stems from a call for proposals offered to all 39 municipalities in Rhode Island in June 2008, in which we received proposals from five potential partners. The Tri-Community Coalition of Pawtucket, Central Falls and Cumberland was chosen due to the following factors:

- There is already a strong coalition formed which includes numerous community groups
- The Tri-Community Coalition has already identified the Broad Street corridor of their community as being most in need and is in the process of finalizing the Broad Street Action Plan
- Demographics indicates these three communities have the highest economic need
- These communities presented the longest list of potential brownfields properties
- There was already a high level of community involvement
- The Broad Street Action Plan proposes to utilize existing infrastructure
- The high extent to which the project would identify and reduce threats to human health and the environment

Based on these factors, RIDEM believes that a brownfields Coalition Assessment partnership with the Tri-Community Coalition, concentrating on the Broad Street corridor, will be greatly successful, providing a high level of economic, public health, and environmental benefits to the Corridor's residents.

In 2007, the Tri-Community Coalition, in partnership with the Blackstone Valley Tourism Council (BVTC), began working to develop regional cooperative solutions to some of the issues plaguing the Broad Street corridor. BVTC then applied for, and was awarded, a Preserve America grant from the National Park Service to undertake a regional planning project. This planning project is helping to develop a Broad Street Action Plan, or road map, which will chart the course for the larger effort to revitalize the Broad Street corridor. Part of this Action Plan identifies assessing and cleaning up some of the many brownfields that have become a familiar sight along the streetscape. Not only will this reduce the threats to human health, but by giving aid to prospective property owners the process of clean-up and reuse can begin, and residents/business owners will have an alternative to tenancy and underutilization. This process will also contribute to the health of the Blackstone River and its watershed, which crisscrosses the three communities and Broad Street before it empties into the Narragansett Bay and the Atlantic Ocean.

Numerous partners are now part of this regional holistic initiative – Progreso Latino, the Northern Rhode Island Chamber of Commerce, the Rhode Island Economic Development Corporation's Every Company Counts, the Rhode Island Small Business Administration, the Rhode Island Historical Society and the Pawtucket Citizens Development Corporation. However, the strongest supporters of this Initiative are the communities' residents and business owners – with intensive community outreach, this plan is completely based on the input that has been received from numerous local meetings and town-hall style assemblies. The Initiative's goal is to not only meet the needs of the three communities, but to make sure that maximum sustainable benefits are enjoyed by residents and business owners in the Broad Street corridor.

Due to the fact that RIDEM is able to significantly leverage other funding sources, only direct contractor expenses will be paid for under this grant. All other expenses, such as oversight, travel and supplies will be paid for out of other funding sources (See Section 2.B.ii below). Therefore, 100 percent of this grant award will be utilized directly for site assessments and cleanup planning.

Under this grant, RIDEM intends to utilize 60 percent of the funding to carry out site assessment tasks for our Coalition Partners in the Broad Street corridor. The remaining 40 percent will be utilized statewide. Since our Coalition Partners are located in heavily urban areas and in an attempt to fairly distribute funding, we intend to concentrate the statewide portion of the funding for assessments in non-urban areas of the state. Site assessment activities carried out under this grant will include a minimum of 25 Phase I Site Assessments, 10 Phase II Site Assessments, and associated cleanup planning tasks at 10 sites. With the help of our Coalition Partners, we have determined that this represents a minimum

of 15 Phase I Site Assessments, six Phase II Site Assessment, and associated cleanup planning tasks at six sites within our Coalition Partners' Broad Street Action Plan area. Our Coalition Partners have identified approximately 90 potential brownfield sites in the target area, and have prioritized 18 of the sites representing over 32 acres of land.

The site selection process will continue to utilize the current TBA application (See Appendix C). The TBA application requires information necessary to determine if a site is eligible to receive assistance (questions 12 and 13) based on all of EPA's eligibility requirements. RIDEM's TBA application process is a competitive process and sites are scored and prioritized based upon numerous factors, such as the extent to which a property is underutilized, assessment costs, development of a reuse plan (which includes sustainable redevelopment), financial incentives offered by the applicant, leveraging of funds for cleanup, creation of open space, and the applicant's community involvement process. The State of Rhode Island requires that each municipality prepare a Comprehensive Plan and Affordable Housing Plan, which must be updated through a stakeholder process every 5 years. Sites which have been identified in the Comprehensive Plan receive higher points. This application and selection process will be utilized under this grant.

With this grant, RIDEM aims to stimulate other funding sources and economic development at brownfields sites, as well as facilitate identification and reduction of threats to human health and the environment. Our site selection process lends higher priority to open space proposals and to projects which utilize existing infrastructure. The majority of Rhode Island communities are small communities which are under-funded and under-staffed. These communities have come to depend on RIDEM's Brownfields Assessment program to provide assessment funding and expertise which they otherwise would not be able to obtain. To date, RIDEM has completed 35 brownfields assessments throughout Rhode Island with the help of federal funding, the majority of which have been redeveloped or are in the process of being redeveloped. Utilization of these funds will help to continue the successful progress of RIDEM's Brownfields Assessment program, which has been ongoing since 1996.

2.b Budget for EPA Funding and Leveraging Other Resources

2.b.i Budget Table and Detailed Task Description

Budget Categories	Project Tasks			
	Task I : 25 Phase I 's	Task II : 10 Phase II 's	Task III: 10 Cleanup Planning	Total
<i>Personnel</i>	-	-	-	-
<i>Fringe Benefits</i>	-	-	-	-
<i>Travel</i>	-	-	-	-
<i>Equipment</i>	-	-	-	-
<i>Supplies</i>	-	-	-	-
<i>Contractual</i>	\$ 125,000	\$ 750,000	\$ 125,000	\$ 1,000,000
<i>Other</i>	-	-	-	-
Total	\$125,000	\$ 750,000	\$125,000	\$1,000,000

Specific Tasks are as follows:

The majority of site assessment activities will be carried out by a State approved Technical Assistance Contractor (Contractor) (see Section 2.c.i Staff Expertise and Qualifications below for details). Cost estimates are based upon actual costs for projects which have been completed during 2008 for similar work conducted under existing TBA contracts and a breakdown of all tasks has been agreed upon by all Coalition Partners. As previously indicated, personnel costs will not be charged to this grant; however, estimated in-kind personnel costs over the three year grant period are expected to exceed \$100,000.

Task I – Phase I Site Assessment	RIDEM proposes conducting 25 Phase I Site Assessments (projected output) at a cost of approximately \$5,000 each for a total of \$125,000. All Phase I Site Assessments will be conducted in accordance with EPA's All Appropriate Inquiry requirements and as such will meet all ASTM E 1527-05 requirements. A total of 15 Phase I assessments will be conducted for our Coalition Partners, with a minimum of one Phase I to be conducted in each of the three communities. An additional 10 Phase I Site Assessments will be conducted state wide. Copies of all Phase I Assessment Reports will be provided to EPA Region I within 30 days of completion.
Task II – Phase II Site Assessment	RIDEM proposes to conduct 10 Phase II Site Assessments (projected output) at a cost of approximately \$75,000 each for a total of \$750,000. All Phase II Site Assessments will be conducted in accordance with an EPA Region I approved Quality Assurance Project Plan and RIDEM <i>Rules and Regulations for the Investigation and Remediation of Hazardous Materials, as amended February 2004</i> . A total of six Phase II assessments will be conducted for our Coalition Partners, with a minimum of one Phase II to be conducted in each of the three communities. Four will be conducted state wide. Results will be compiled in a final TBA report and copies provided to the TBA applicant, property owner (if different from applicant), potential buyer (if applicable), RIDEM and EPA within 30 days of completion.
Task III – Cleanup Planning	<p>RIDEM proposes to conduct cleanup planning at 10 sites (projected output) at a cost of approximately \$12,500 each for a total of \$125,000. A total of Six Cleanup Planning phases will be conducted for our Coalition Partners, with a minimum of one Cleanup Planning to be conducted in each of the three communities. Four will be conducted state wide. Cleanup planning tasks may include the following:</p> <ul style="list-style-type: none"> • Abutter Notification/Public Notice • Limited Remedial Design Investigation & Report • Remedial Soil Management Plan • Post-remedial Soil Management Plan • Public Meeting & 30 Day Public Notice Period • Remedial Action Work Plan & Remedial Planning • Environmental Land Usage Restriction Draft

2.b.ii Leveraging of Additional Resources

RIDEM currently has the ability to leverage CERCLA Section 128 (a) Subtitle C funding through an EPA Cooperative Agreement. All personnel oversight for work conducted under Brownfields Assessment grants will be paid for out of the 128 (a) grant, allowing allocation of the full amount of this Section 104 (k) grant to be directed to contractual assessment work in its entirety. Throughout its assessment experience, RIDEM has found that nearly all projects require additional assessment work upon completion of the initial Phase II work, which is why we have budgeted \$75,000 in Phase II funding for each project. \$75,000 is generally enough to complete any additional assessment work necessary; however, in the event that additional funds are needed in addition to those budgeted, RIDEM does have other limited funding sources to augment each projects budget, if necessary. RIDEM's Section 128 (a) grant has consistently had \$100,000 authorized annually for contractual expenses to conduct TBAs and/or cleanup work and we anticipate that future cooperative agreements will have equivalent funds which can be used for assessment work not met through this grant, or for limited cleanup activities. In addition, RIDEM has funding available from Natural Resource Damage Claim settlements which have specifically been earmarked to be used for brownfields assessments within the Woonasquatucket and Pawtuxet River watersheds (totals \$200,000, to be spent over the next 3-4 years). While these additional sources of funding are not enough to initiate all assessment projects we currently have in the queue, through intense project management we have been able to properly manage each project in order to meet all assessment requirements and supplement cleanups as needed.

Our Coalition Partners have been diligently forming partnerships and leveraging funding from various sources and in-kind services from various organizations, which we believe this brownfields assessment grant will be able to piggyback upon. Successful revitalization of the Broad Street corridor is currently the subject of a Preserve America Grant from the National Park Service which our Coalition Partners have received. Providing a 100 percent match of \$50,000 in funding and in-kind services, the Tri-Communities Coalition and BVTC received the \$50,000 Preserve America Grant for the Broad Street Revitalization Study, which will result in an Action Plan for revitalization (currently in draft form and intended to be finalized before the end of 2008). The Broad Street Revitalization Study has relied heavily on community

participation and has forged connections with a wide number of stakeholders who are committed to targeting their resources in the Broad Street corridor. Progresso Latino provides translation services for the project. The Northern Rhode Island Chamber of Commerce, in partnership with other business oriented organizations, has developed a series of workshops for business owners along Broad Street. Rhode Island Housing has also awarded a KeepSpace (<http://keepspace.org/>) grant to the Pawtucket Citizens Development Corporation (PCDC), which is a non-profit affordable housing developer, for the construction of new affordable housing and mixed use developments along the Broad Street Corridor. PCDC has worked with all three communities on the Broad Street Revitalization Initiative and is excited about the opportunity to combine their resources for affordable housing with resources for brownfields assessment along the corridor. The Town of Cumberland has recently received \$75,000 for a revolving loan fund from the Community Development Block Grant program, which is available to business owners along Broad Street in all three communities for façade improvement. The three communities will also apply for a Certified Local Government grant from the Rhode Island Historic Preservation & Heritage Commission to update the historic resources inventory along the Broad Street corridor. The Tri-Community Coalition is committed to keeping this project going and will work together to continue a high level of community participation by applying for available grant funding, and hosting/coordinating public meetings and public outreach.

RIDEM is committed to working with our Coalition Partners to help ensure the success of projects initiated under this grant. We intend to work with the communities to identify additional funding sources available to them in order to complete these redevelopment projects. Additional funding sources available to applicants currently include EPA Cleanup Grants and Revolving Loan Funds, Rhode Island Economic Development Corporation Revolving Loan Fund, Housing and Urban Development grants, Community Development Block Grants, US Department of Agriculture grants, US Economic Development Administration funding, and grants/loans from Rhode Island Housing.

2.c Programmatic Capability

2.c.i Currently or Has Ever Received and EPA Brownfields Grant

RIDEM's Office of Waste Management (OWM) currently has two EPA Assessment Grants and one Section 128(a) grant, as well as over 70 other federal grants annually for which the accounting is managed by RIDEM's Office of Management Services. RIDEM's OWM has been managing EPA Cooperative Agreement grants since 1985 with the first Superfund Pre-Remedial Multi-Site Cooperative Agreement. Since that time, RIDEM has managed numerous annual cooperative agreements, including Superfund National Priority List, CORE, Superfund Pre-Remedial, and Brownfields 128(a).

The five most recent Brownfields grant received by RIDEM are:

Grant Name	Grant Period	Original Funded Amount	Balance of Funds as of 10/1/08
FY 2006 Section 128(a)	10/1/06-9/30/07	\$1,185,515	0
FY 2007 Section 128(a)	10/1/07-9/30/08	\$1,197,474	0
FY 2008 Section 128(a)	10/1/08-9/30/09	\$1,185,519	\$1,185,519
FY 2007 Brownfields Assessment Grant – Hazardous Substance	10/1/07-9/30/10	\$ 200,000	\$189,000
FY 2008 Brownfields Assessment Grant – Hazardous Substance and Petroleum	10/1/08-9/30/11	\$ 400,000	\$ 400,000

All grants are currently on schedule to expend all funds on or before the end of the grant period.

Compliance with Grant Requirements

For each of these grants, RIDEM has consistently met the Terms and Conditions of the grants, is current on submittals of quarterly reports and up to date with ACRES data input.

RIDEM is in the process of preparing the year end report for 2008 for its Section 128(a) grant and anticipates submitting the required semi-annual reports in a timely manner thereafter. All work plans and quarterly report have been prepared on time for the 2007 Assessment Grant, and all Property Profile forms have been and will continue to be submitted through ACRES and will be reviewed and updated on a quarterly basis as required.

Accomplishments

RIDEM's Brownfields Assessment Program has been providing brownfields assessment assistance to municipalities, tribes and non-profit organizations since 1996. RIDEM has been managing EPA Brownfields cooperative agreements since the inception of the Brownfields Pilot program in 1996, including the Brownfields Showcase Community Pilot from 1998 through 2002. RIDEM has also been the recipient of EPA's Section 128(a), Subtitle C grant since 2003 and currently receives over \$1 million annually to support our brownfields programs. RIDEM's OWM has also managed nearly \$1 million in TBA funding since 1999.

With the help of federal funding, RIDEM has completed 35 brownfields assessments for municipalities and non-profit organizations, the majority of which have been redeveloped or are in the process of being redeveloped. RIDEM has established a successful methodology for soliciting and selecting sites for assessments under these grants. Site selection criteria has been and will continue to be determined based upon RIDEM's TBA application and prioritization system which is currently in use. Currently, RIDEM has on file 20 TBA applications and intends to initiate approximately seven of these assessments within the next year. Through the extensive outreach efforts which RIDEM has conducted, municipalities and non-profit organizations across the state have come to depend on RIDEM's Brownfields Program.

Successful TBA projects include the Knowles Mills Recreation Area, West Warwick Senior Citizens Center, Festival Pier (see Appendix D). In addition, with nearly 2000 contaminated sites in our program, RIDEM's Voluntary Cleanup Program (VCP) also has an established list of accomplishments with the help of the 128(a) funding it has received. During the past three years, the VCP has approved the assessment of 167 sites, and has approved the remediation of 132 sites.

Staff Expertise and Qualifications

The TBA and Assessment Grant Program Manager, Cynthia Gianfrancesco, has worked for RIDEM for over 20 years in hazardous waste and site assessment/remediation programs. Ms. Gianfrancesco has been managing EPA grant funded programs since 1990, including the Superfund Pre-Remedial Program (1999 to present), the TBA program (January 2005 to present), and Assessment Grant program (June 2007 to present) all of which the majority of funding is dedicated to carrying out site assessments. There are two project managers dedicated to the assessment program: Joan Taylor, Senior Environmental Scientist, with 16 years experience in the hazardous waste and site assessment/remediation programs; and Ann Battersby, Environmental Scientist, with five years experience in the site assessment/remediation program. Additionally, there is currently a staff of 10 engineers and scientist that support RIDEM's Brownfields Program whose time/experience can also be drawn upon. Also, RIDEM's Office of Management Services is dedicated to RIDEM's financial management and has a staff of financial experts who manage the details of all EPA grants.

The majority of assessment work, including compilation of the Phase I assessments, Quality Assurance Project Plans (QAPP), Phase II assessment field work and Targeted Brownfields Assessment Reports is carried out by one of RIDEM's Contractors. The Contractors are pre-qualified environmental professionals who are selected to participate in the State of Rhode Island Master Price Agreement (MPA) #309 (online at: <http://www.purchasing.ri.gov/RIVIP/BidListing.asp?BidNumber=B06067>) for site assessment and remediation activities after going through a public bid process which complies with the Federal procurement procedures contained in 40 CFR 31.36. Contractors are selected for a period of three years with three annual renewals after being pre-qualified for technical

capability and their rates pre-approved (list of contractors online at: <http://www.purchasing.ri.gov/RIVIP/MPAAwards.asp?MPANumber=309&MPADesc=Technical+Assistance+Contract+Services>). Contractors are selected from the Master Price Agreement on a site-by-site basis. As a cost saving measure, these Contractors have all been required by RIDEM to possess a Region I approved Generic Brownfields QAPP, so that each project only needs a Site Specific QAPP Addendum. This has allowed additional funding to be available for actual assessment work at sites. RIDEM staff and the Contractors will be dedicated to carrying out all assessment activities under this grant.

Adverse Findings and Corrective Actions

Based on information from RIDEM's Office of Management Services, there have been no adverse findings reported.

3. Community Engagement and Partnerships

3.a Community Engagement Plan

As the leading state agency for environmental affairs in the State of Rhode Island, RIDEM is experienced with the process of notifying and engaging the public in high-priority environment and land use decisions/projects which will have significant impacts on local neighborhoods. In addition, RIDEM's long standing and well-established brownfields program has developed cooperative partnerships with numerous organizations, communities and other state entities focused on brownfields revitalization and environmental issues associated with brownfields reuse.

RIDEM intends to build upon the strong foundation already assembled by our Coalitions Partners and the staff of the Broad Street Revitalization Initiative to solicit timely feedback from affected residents on revitalization priorities within the Broad Street corridor. With this preliminary reuse planning already underway, RIDEM and its Coalition Partners can begin to focus on the assessment needs within the community.

A very intense community outreach effort was conducted as part of the Broad Street Planning Initiative. Project staff, with the support of municipal officials from our Coalition Partners, went out with a translator and met with every business owner along the entire three mile stretch of Broad Street, some multiple times. In addition, the Broad Street Planning Initiative has included a number of local and state stakeholders. Three public meetings have been conducted as part of the initiative. Notices for these meetings were provided in Spanish and English, and translation services were available at each meeting. Moving forward, the municipalities will utilize existing contacts with community groups and local organizations to keep residents and business owners apprised of the initiative's opportunities and progress. Looking forward, all of the materials will continue to be distributed in multiple languages and interpreter services will be provided at all public meetings as necessary.

In close coordination with our Coalition Partners, RIDEM's plans for actively engaging community organizations and individuals in the Broad Street corridor may include:

- Factsheets/flyers for soliciting continued community engagement.
- Open stakeholder meetings with municipal officials, interested members of the public, and community based organizations in a meeting location convenient to affected residents/organizations will be held upon reaching major milestones (e.g. site selection, completion of Phase II assessments, etc.).
- Local media (newspaper & TV) will be updated periodically with press releases and official notices.
- Key websites (through RIDEM, community based organizations, and municipalities) will be kept up-to-date with the latest information on the progress of the Brownfields Assessment Grant.
- A single point of contact within RIDEM to ensure continuous engagement with the public.
- Utilize RIDEM's full time Press & Communications Office to notify and engage the public.

Updated information will be disseminated (in as many languages as needed) to impacted residents and community based organizations in a timely manner so as to ensure the public is fully aware of the progress of the project. In the process of establishing an open dialogue, environmental justice will be a key objective to provide improved lines of communication with harder-to-reach individuals within the Broad Street corridor. RIDEM is sensitive to the fact that not all persons interested in and affected by this proposal have regular access to a computer and/or the internet, and as such, will make every attempt to not over-rely on web based outreach efforts. In addition, RIDEM will be sensitive to cultural differences and disabled members of the public who want to participate in the execution of this project.

RIDEM and its Coalition Partners will proactively collaborate with residents, community leaders and community based organizations to ensure we are appropriately responding to comments and information is being provided in a manner that is helpful to the general public and all other interested parties. RIDEM has identified one point person, Cynthia Gianfrancesco, to handle inquiries (US Mail, email or phone communication) about the project from beginning to end. Facilitating open lines of communication is a key component of the success of this proposal.

3.b Local, State and Tribal Partnerships

RIDEM is the primary state agency which holds jurisdiction over protection of human health and the environment in the state of Rhode Island, and as such has a great deal of expertise in this area. Due to Rhode Island's small size, there are no local or county environmental or health agencies. The Rhode Island Department of Health (RIDOH) is frequently asked to become involved in specific projects where human health issues are complex and additional information needs to be disseminated to the general public. The two agencies routinely cooperate in public outreach efforts, the creation of stakeholder groups, and the promulgation of new environmental and/or public health regulations. RIDEM will look to the RIDOH for more detailed information about known health risks, sensitive populations and immediate risks to human health within the Broad Street corridor as specific sites are identified for assessment and reuse planning.

All assessment and cleanup planning activities will be conducted under RIDEM's VCP (see flow chart in Appendix E) in accordance with the *State of Rhode Island, Department of Environmental Management, Office of Waste Management Rules and Regulations for the Investigation and Remediation of Hazardous Materials Releases (Remediation Regulations)* (online at <http://www.dem.ri.gov/pubs/regs/regs/waste/remreg04.pdf>) and other applicable regulations. The purpose of the Remediation Regulations is to create an integrated program requiring reporting, investigation and remediation of contaminated sites in order to eliminate and/or control threats to human health and the environment, both on and off of the site, in a timely and cost-effective manner. To ensure consistency and certainty in the process, cleanup objectives for soil and groundwater have been developed to manage the risks to human health and the environment, and are to be applied in a manner consistent with the current and expected future use of the contaminated property.

Sites proceed through the TBA program in a slightly different manner than when under the VCP due to the fact that it is actually RIDEM who is conducting the assessment. Under the TBA program, at the completion of the Phase I assessment by RIDEM, a RIDEM Contractor will prepare a Site Specific QAPP Addendum for EPA review and approval. In the event that the proposed future use of the site is for a school, a daycare facility or a recreational use facility, the applicant is required under the Rhode Island *Industrial Property Remediation and Reuse Act*, to hold a 20 day public comment period and hearing at the completion of the Phase I prior to the completion of the Site Specific QAPP Addendum. Upon approval of the Site Specific QAPP, RIDEM will issue a public notice informing the public of what assessment work will be conducted and when. Upon completion of the investigation, a draft TBA report will be prepared which will include the results of the investigation, and include at least three proposed remedial alternatives (including cost estimates) which will be based upon the future use of the property (i.e. residential, industrial, commercial, mixed use). RIDEM will then meet with the applicant to further discuss the proposed future use and select a preferred remedial alternative. The preferred remedial alternative will be incorporated into the final TBA report and RIDEM will issue a Program Letter, advising the applicant that the investigation is complete and is in concurrence with the preferred remedial alternative. A second public notice will then be issued, including a 14-day public comment period, advising the public that the TBA report is complete, the nature of the proposed remedial alternative, and soliciting comments on the technical feasibility of the selected remedy. After any comments received are sufficiently addressed, RIDEM then issues

a Remedial Decision Letter advising the applicant to proceed with completion and submittal of the Remedial Action Work Plan. RIDEM will then work with the applicant through the cleanup planning phase and complete the Remedial Action Work Plan. The Remedial Action Work Plan must detail a remedy which addresses the requirements of Section 8.00 Risk Management and Section 9.00 Remedial Action Work Plan, of the Remediation Regulations, and specifically address every contaminated media to assure that the remedial objectives are protective of human health and the environment. Upon approval of the Remedial Action Work Plan, RIDEM issues a Remedial Approval Letter which advises the applicant to proceed with remediation at the site. Remediation and redevelopment then proceeds under the close oversight of RIDEM's VCP until completion, at which time a Letter of Compliance is issued.

Lastly, sustainable reuse of brownfields sites is an important goal of RIDEM. RIDEM's TBA and VCP goals incorporate sustainable reuse objectives through regulation and policy. RIDEM's TBA application specifically addresses sustainable reuse by requesting applicants to consider or plan for sustainable reuse in the early stages of site investigation, and awards more points to sites when sustainable reuse is being proposed, particularly when sustainable reuse is incorporated into a community's Comprehensive Plan. Redevelopment options are frequently only conceptual during the assessment phase. Sustainability becomes more important in remedial phases. By requiring applicants to consider sustainable reuse during the assessment phase, we believe it will result in a higher level of sustainable reuse.

3.c Community-Based Organizations

See Appendix A for associated letters from each organization.

	Description, Role, Makeup, Services Provided & Intended Working Relationship During the Grant
Blackstone Valley Tourism Council (BVTC)	<ul style="list-style-type: none"> • State designated regional tourism development agency for the Northern Rhode Island Tourism District; initiated the Broad Street Regeneration Planning Initiative by applying for a Preserve America Grant to develop solutions for issues plaguing Broad Street. • Non-profit corporation governed by a 21 member Board of Directors which promotes events to attract tourism visits & spending as well as projects to enhance civic pride. • Will provide overall logistical support for outreach to the community & business interests about brownfields assessments & reuse planning. RIDEM will look to the BVTC to host/coordinate public meetings, distribute community outreach material (web & newsletters), and translation services.
Broad Street Regeneration Planning Initiative	<ul style="list-style-type: none"> • A planning project aimed at developing an Action Plan, or road map, which will chart the course for the larger efforts to revitalize the Broad Street corridor. In partnership with our Coalition Partners, coordinates the activities of the three impacted communities on developing the Broad Street Action Plan. • Works under the auspices of the Blackstone Valley Tourism Council. • Will help identify potential sites, host/coordinate public meetings, distribute community outreach material (web & newsletters), and translation services. RIDEM will look to staff from the Broad Street Planning Initiative to serve as the on-the-ground partner in the community & help keep interested residents/businesses moving forward with grant implementation.
Progreso Latino	<ul style="list-style-type: none"> • Key non-profit organization serving the many needs of northern Rhode Island's Latino population; active in the Broad Street Regeneration Planning Initiative & Tri-Communities Coalition. • Represents the residents/entrepreneurs of Latin American heritage in the Broad Street area. • Progreso Latino's liaison & communication (e.g. translation & interpretation) role will be essential for the grant's ongoing success. RIDEM will look to Progreso Latino to talk with its constituency about brownfields redevelopment issues, especially with the Latino and/or Spanish speaking community.
NeighborWorks Blackstone River Valley	<ul style="list-style-type: none"> • Non-profit community development corporation that focuses on rehabilitation construction of affordable housing & community development initiatives; past projects include brownfields redevelopment & conservation development • RIDEM will look to NeighborWorks to help identify potential sites for assessment and/or redevelopment, communicate with residents/businesses about the role of brownfields redevelopment in the community, host public meetings and provide translation services.

RI Historic Preservation & Heritage Commission (RIHPHC)	<ul style="list-style-type: none"> RIHPHC is the state agency for historical preservation/heritage programs & a key partner with RIDEM/communities on many brownfields projects. As the administer of numerous grant programs for the rehabilitation of historic structures, the Commission has strong roots in the historic Blackstone Valley area of Rhode Island. Will help identify sites for assessment, talk to their constituency about brownfields development issues, host/participate public meetings, post material on their website, & provide advice on brownfields redevelopment issues.
RI Historical Society	<ul style="list-style-type: none"> Privately endowed membership organization, founded in 1822, dedicated to collecting, preserving, and sharing Rhode Island 's history. RIDEM will look to the Society to assist by helping researchers identify materials related to potential sites & to aid in public education related to the fascinating and intriguing history of the Broad Street corridor.
Grow Smart Rhode Island	<ul style="list-style-type: none"> Statewide non-profit public interest group representing a broad coalition of business/non-profit/government partners fighting sprawl & leading the charge for better-managed growth via sustainable policies/programs. Brownfields is a priority issue for Grow Smart Rhode Island. Grow Smart Rhode Island is very active in the Blackstone Valley region of the state and has an excellent working relationship with RIDEM and our Coalition Partners. Will leverage its communication resources & member network to promote brownfields remediation projects and participate in public meetings.
Barton Street Neighborhood Association (BSNA)	<ul style="list-style-type: none"> Active neighborhood association representing the interests of low-moderate income residents in the southern portion of the Broad Street Corridor. Works with other local organizations in the Central Falls/Pawtucket area to ensure revitalization activities are informed & lead by neighborhood residents. Will help identify sites, talk with BSNA constituency about specific sites or brownfields issues in general, post community outreach material in local neighborhoods and distribute materials at community events.
John H Chafee Blackstone River Valley National Heritage Corridor	<ul style="list-style-type: none"> Congressionally created National Heritage Corridor as an affiliate of the National Park Service focused on the management of cultural/natural resources within the Blackstone River Valley. Works in partnership with a variety of federal, state & local agencies, along with many non-profit and private organizations, to protect the sites and resources of the Blackstone Valley. RIDEM will look to the National Heritage Corridor to facilitate interagency collaboration, assist with community outreach, preparing redevelopment plans & distribute information via the web/newsletters.
Pawtucket Citizens Development Corporation (PCDC)	<ul style="list-style-type: none"> Private non-profit community development corporation that focuses on rehabilitation construction of affordable housing & community development initiatives in Pawtucket, Rhode Island. Maintains deep roots in the Broad Street corridor and acts as a key resource for redevelopment and blight-elimination initiatives in Pawtucket, Rhode Island. RIDEM will look to PCDC for assistance with site identification, hosting public meetings, outreach about brownfields and their risks, & distributing community outreach material in the Corridor.

4. Project Benefits

4.a. Welfare and/or Public Health

The residents in the Broad Street corridor will see multiple environmental, social and public health benefits from this project during and beyond the life of this grant. Through an ongoing relationship with municipal leaders in Central Falls, Pawtucket and Cumberland, RIDEM will work with property owners and community leaders to ensure this funding will bring the maximum level of benefits to sensitive populations, especially the large number of low-income and minority residents, who live and work in the Broad Street corridor.

The need to properly assess and begin remediation of brownfields sites in Central Falls, Pawtucket and Cumberland far outweighs the resources available to RIDEM and all communities through EPA grants and other state/local sources. This Brownfield Assessment Grant will help further connect RIDEM staff, and their collective expertise, with its Coalition Partners in such a way that fosters cooperative relationships focused on issues of the utmost important to residents and

leaders in these communities: community development, job creation, historic preservation, business growth, improved public safety, new open space, greenspace and recreational opportunities, and the elimination of environmental blight.

Environmental Benefits	<ul style="list-style-type: none"> • Historically, numerous contaminants have been identified in these areas, including heavy metals, PCBs, chlorinated volatile organic compounds, semivolatile organic compounds, and petroleum. Due to the fact that many of these sites are adjacent to/upgradient from the Blackstone River, reduction of water quality impacts to the Blackstone and Narragansett Bay will be ongoing. • Not only is the Blackstone River an important urban ecosystem, it also serves as an important fisheries/recreational resource for the Broad Street corridor residents. Residents will benefit from the reclamation of this key resource for its scenic and recreational value. • Reduced impacts to groundwater, surface runoff and migration of contaminants to neighboring properties; removal of biological/physical/ chemical risk associated with contaminated sites (both large and small sites).
Social/Welfare Benefits	<ul style="list-style-type: none"> • Designing the community for improved community/public safety. • Improved quality of life/revitalized neighborhoods via a reduced number of underutilized properties. • Increased number of clean/affordable housing units; increased number of local jobs. • Stimulating local minority business growth; historic preservation and façade improvements. • Pedestrian and streetscape improvements; improved traffic and parking management strategies. • Increase in civic pride, resident voice and municipal participation through holistic place-making techniques.
Public Health Benefits	<ul style="list-style-type: none"> • A reduction in the number of abandoned and deteriorated sites/structures that pose clear health and safety risks for community residents. • Asthma reductions due to improved air quality (stemming from improved traffic/parking management strategies in the Broad Street corridor). • Overall reduction of exposure pathways (e.g. vapor intrusion, dermal contact) • Decreased risk associated with contact with impaired waters in the Blackstone River.

RIDEM, along with its Coalition Partners, understands that protecting the local community and sensitive populations from project contaminants during assessments is of utmost importance. A large portion of the Broad Street corridor is considered an Environmental Justice Area as defined in RIDEM's "Policy for Considering Environmental Justice in the Review of Investigation and Remediation of Contaminated Properties" (July 2008). This policy requires signage (e.g. includes call in numbers for questions or concerns) at the site and calls for meaningful public involvement in the investigation and cleanup of contaminated sites. For residents living/working in Environmental Justice Areas impacted by actual or suspected environmental contamination, implementation of RIDEM's environmental justice policy will provide clear, predictable opportunities to participate in environmental decision-making relative to the investigations and remediation of property regardless of race, income, national origin or English language proficiency. RIDEM and its Coalition Partners will examine more site-specific opportunities to include, inform and protect the public during assessments once actual sites are chosen for investigation, such as the use of direct push technologies for collection of soil and groundwater samples, which prevent the release of contaminants to the environment and surrounding populations. In the event that more intrusive methods, such as test pits, are required, all applicable dust and odor control measures will be adhered to during site assessment activities.

The potential to revitalize one the most limited and precious resources in the densely developed Broad Street corridor – clean and usable land – and bring about measurable benefits for the residents living and working with the Broad Street area is real. The result will be a healthier, regenerated, more resilient community that takes pride in its built and cultural heritage and the unique living-landscape sited along the historic Blackstone River.

4.b.i Economic Benefits and/or Greenspace – Economic Benefits

Our Coalition Partners are early in the reuse planning process; hence, it is more appropriate to describe the *potential* economic benefits of assessing/cleaning-up/redeveloping sites within the Broad Street corridor than to attempt to provide quantitative estimates of the associated economic benefits.

There are two types of brownfields within the Broad Street corridor – large and small. There is only a handful of large brownfield sites along Broad Street, including the 11-acre former Ann and Hope mill and the 4-acre Fair Property – two key properties our Coalition Partners are looking to properly assess and promote for redevelopment. The assessment and cleanup of these sites will allow them to be redeveloped and returned to active uses, providing additional tax revenue and also creating jobs within the corridor. There are also a number of smaller brownfield sites along the Broad Street corridor. One of the goals of the Broad Street Regeneration Initiative is to increase property ownership for businesses along the corridor in close proximity to these smaller more visible brownfields, and to expand overall economic development opportunities within the Broad Street corridor by encouraging private sector development (e.g. development of safe, affordable housing). The benefits of bringing this type of positive development to the depressed and underinvested Broad Street corridor will go a long way towards reducing both visible and aesthetic blight as well as real economic and environmental threats associated with contaminated properties.

Funding for site assessments will remove one of the key financial barriers to the transfer of properties along Broad Street. The assessment and cleanup of vacant lots will enable these properties to be reused and to support the activities of existing businesses, as well as provide lots for infill development.

4.b.ii Economic Benefits and/or Greenspace – Non-Economic Benefits

There are multiple opportunities for the assessment and redevelopment of brownfields into greenspace, greenways, and recreational access points in ways that will provide multiple benefits for residents living/working in the Broad Street corridor. RIDEM's TBA program encourages applications for redevelopment of properties for open space, recreational facilities and for non-profit/governmental purposes and awards extra points for recreational and open space projects. RIDEM recognizes the fact that these types of revitalization projects catalyze further revitalization in surrounding neighborhoods and our Coalition Partners also recognize the importance of access to these natural resources and have embraced the incorporation of greenspaces into redevelopment plans. Under RIDEM's current TBA program, approximately half of the projects initiated over the past three years include open space for active and passive recreation for the entire property. The work done as part of the TBA program has provided these applicants with the information they need to continue planning for greenspace and community projects, and we intend to continue to facilitate the creation of greenspace under this grant. Based on our Coalition Partners' intense community outreach efforts, numerous residents and business operators have demanded the conversion of sites into pocket-parks, plazas, greenspace and access points for recreational activities throughout the Broad Street corridor. Specifically, the Ann and Hope mill property could provide a link to the Blackstone River Bikeway (one of Rhode Island's most scenic and heavily traveled bikeways and what the Coalition Partners consider one of their new "main-streets"), and some of the smaller brownfield sites on the Broad Street corridor may be redeveloped into passive recreation areas.

By way of example, the Blackstone River Bikeway will ultimately extend 48 miles from Providence, Rhode Island to Worcester, Massachusetts. Currently, 10 miles of bike path are open to the public in Central Falls, Lincoln, and Cumberland. When completed, the bike path project will result in a mostly off-road alternative transportation facility passing through the historic Blackstone River Valley National Heritage Corridor. The Blackstone River Bikeway will serve as an alternate mode of transportation for commuters as well as the region's premiere multi-use recreational facility. This bi-state linear State Park along the Blackstone River will connect New England's second and third largest cities and serve a population of more than one million. RIDEM and its Coalition Partners believe a high priority should be placed on efforts to use this grant funding to further connect properties along the Broad Street corridor with existing and proposed recreational areas like the Blackstone River Bikeway.

4.c. Environmental Benefits from Infrastructure Reuse/Sustainable Reuse

The Corridor is served by existing infrastructure, including all utilities and public transit, and one of the key goals of the Broad Street Regeneration Initiative is to make the corridor more sustainable by capitalizing on these advantages. This will make redevelopment activities less costly and minimize the need to expand utilities into greenspace areas. Incorporating the key principles of "smart growth" into the development decisions of all Coalition Partners will help foster the type of forward thinking and progressive leadership communities need to help assess and revitalize brownfields.

The statewide benefits of focusing growth in areas adequately served by existing required infrastructure is currently captured in the state's key statewide planning documents. The Broad Street corridor, as well as all of Pawtucket and Central Falls and much of Cumberland, is within the Urban Services Boundary depicted in Land Use 2025, the Rhode Island State Land Use Policies and Plan. This plan (updated April 2006) places particular emphasis on using incentives to steer future growth to those places that need and can best accommodate such sustainable growth -- our urban, town and village centers. While they may be in need of some repair, the Broad Street corridor is currently served by all the necessary infrastructure to sustain adequate reuse -- water, sewer, electricity, roads, side walks, stormwater systems, public transit routes and densely developed buildings.

Globally, there has been a heightened interest in Smart Growth and sustainability as a way for communities to guide development -- and the focus on sustainable redevelopment with the Broad Street corridor is no exception at all. Many of the components that characterize Smart Growth and sustainable development - a compact development pattern, a mix of uses, and development within urban areas - already characterize Broad Street. Its mixture of uses -- businesses, homes, churches, schools, industry, parks and government buildings - can all be found within this dense three mile stretch. However, the introduction of single-use box stores has begun to creep in and overgrow some of the streetscape. The danger to the community is unbeknownst to many because it is regarded as "new investment."

A major portion of the Broad Street Action Plan will include education on historical preservation, sustainable development alternatives and social responsibility. Provisions in the Action Plan will also include restrictions on single-use structures and require pedestrian-scale development with a new overlay district. The first goal of any transit-oriented development should be walkability and the Broad Street Initiative is no exception. Current plans in the community also include reactivating passenger access to the rail-lines that run through the middle of the three communities, opening up private trolley loops that mimic small passenger buses used in many Colombian streets and removing the public subsidization of free parking. A strong investment has also been made in developing a bicycle path that passes through the three communities and connects to a massive network of other cycle paths. The Initiative plans to highlight bicycle, pedestrian, public transit and even river access as alternative methods of living and working within the corridor.

4.d Plan for Tracking and Measuring Progress

In order to determine if the work conducted under this grant is achieving the expected outcomes, RIDEM, in coordination with its Coalition Partners, intends to continue using the Property Profile forms to track and measure progress. RIDEM recognizes the importance of meeting expected outputs and outcomes and the ability to track and measure these is a reflection of the success of the program. As such, RIDEM intends to complete Property Profile forms on a quarterly basis and track not only each element to be carried out under this grant, but future elements as a result of the work completed under this grant. Grant elements which may be tracked include the number of acres assessed and the associated deliverables, such as the number of Phase I assessments completed, the number of Phase II assessments completed, and the number of cleanup plans completed. Future elements to be tracked may include the number of acres cleaned up and put back to reuse, number of jobs created, and number of acres of greenspace created for the communities of Central Falls, Pawtucket and the Valley Falls section of Cumberland.