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WOONASQUATUCKET RIVER WATERSHED COUNCIL

July 15, 2004

Statement to Contaminated Sediments Technical Advisory Group (CSTAG)

The Woonasquatucket River Watershed Council (the Council) is a 501(c)(3) organization. Our purpose is to encourage, support and promote the restoration and preservation of the Woonasquatucket River watershed as an environmental, recreational, cultural, and economic asset of the State of Rhode Island.

The Council appreciates the opportunity to speak with you concerning the sediment investigation and cleanup of the Centredale Manor/Woonasquatucket River. The letter specifically requested our

1. Ideas and insights about the investigation so far
2. Thoughts about appropriate remedial alternatives in the future
3. Concerns about the impact of the projects
4. Ideas about how EPA can best disseminate site-related information and provide opportunities for meaningful involvement, and
5. Recommendations for improvement.

The Council will address these issues as they relate to the work of the Council, and when appropriate within the context of relevant EPA Risk Management Principles 1, 2 and 3. We will not be commenting on Principles 4 through 11 at this time.

Question 1. Investigation to date:

Principle 1. Source Control: The site investigation and source control initiatives at the Centredale Manor/Woonasquatucket River site are ongoing. The area of concern was recently extended to include Lymanville Pond and Johnston riverfront properties.

Is the area of concern going to continue to expand? Has there been sufficient sediment sampling downstream – Manton Pond, and at points downstream in Providence, to definitely establish the area of concern? A sample taken in Providence prior to the reconstruction of Allendale dam spiked at .45ppb dioxin, and we are concerned that contaminated sediment continued to migrate, following the initial sediment tests, before and after the dam was reconstructed.

Principle 2. Community Involvement:

The outreach has consistently involved the community directly involved, i.e. the residents of Centredale Manor and adjacent property owners. EPA funded the Northern RI Conservation District to develop and present a "Do's and Don'ts" program for the Woonasquatucket River to

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3rd and 5th graders in North Providence and Johnston, and in some Providence Schools. Funding for the program has ended, and the watershed council was asked to continue the program without funding. Signage along the river in North Providence, Johnston and Providence informs the public about safety issues.

The WRWC believes that the area of impact reaches far beyond the area of concern as defined by the EPA, and we are concerned that there is no ongoing program for educating residents of all ages in the impacted communities of Johnston, Providence and North Providence. Allendale Pond is highly valued natural resource, and in many eyes the rebuilding of the dam made the problems go away and all is well now, as one told us, now that "we have our pond back". The outreach has not effectively permeated the towns beyond the areas of immediate impact. There is a sense that the time-critical removal action and rebuilding of the dam have eliminated the risks and restored the river. The Council sponsors canoe rides and events in riverfront parks, and always includes information about safe uses of the river, but we think that more needs to be done.

In Providence alone, over 30,000 residents live within a 10-minute walk of the Woonasquatucket River, an important natural resource in their neighborhoods. Children of all ages and in all communities seek out the river (even if they have to climb a fence) and use the river for wading and like many of us as a quiet place to walk and retreat from the urban density of their neighborhoods. Providence has the fourth highest level of childhood poverty in the United States, and the Woonasquatucket River flows through the neighborhood of Olneyville, which has the highest level of childhood poverty in Providence. Owner occupancy in Olneyville is 18.2%, neighborhood residents are transient and many do not speak English. Signs indicating that the fish are not safe to eat, and swimming is not safe, are relatively meaningless to youth in these neighborhoods and housing projects when the temperature reaches 90 degrees and your family is hungry. We have seen children and families fishing at various spots along the river, and watched as young child struggled to control a mallard he had caught to take home to his mother for dinner.

Principle 3. Coordinate with States, local Governments, Tribes and Natural Resource Trustees.

Representatives from the towns of North Providence and Johnston, the RI Departments of Environmental Management and Health, and a representative of the Urban Rivers Committee (established by RI DEM and EPA) are members of the MAC committee. Providence is not geographically in the area of concern, and is not a party to the meetings or a recipient of the information.

Question 2. Thoughts about appropriate remedial alternatives in the future

While more study results are being compiled, the recently released Woonasquatucket River Human Health Risk Assessment Study and the previously released studies on barn swallows clearly delineate the ongoing risk to the human and wildlife population.

Principle 10 calls for Design remedies to minimize short term risks while achieving long term protection. Any long term protection should include the goal of restoring the river to be safe for fishing and swimming, and to return the adjacent land to beneficial reuse. At this time, we believe that dredging and removal of the contaminated sediments is the remedial alternative of choice. The Council is in the process of applying for a TAG grant to increase our and the community's capacity to address the complicated issues relating to the contamination in the sediment and on the lands adjacent to the river. Our discussions in Question 3 will outline the

significant investment the community and government agencies are making to restore the Woonasquatucket River as a healthy habitat for wildlife and humans.

Question 3. Concerns about the impact of the projects

The Woonasquatucket River, a federally designated American Heritage River, is an increasingly important natural resource in our urban communities, and its revitalization is important to the ongoing work targeting habitat restoration, recreational access and environmental education. As outlined in Question 3 below, there has been significant resident, and local, state and federal investments in the revitalization of the river and its adjacent lands. In spite of the years of neglect and degradation, the banks of the Woonasquatucket even in our most urban areas provide habitat for herons, hawks, fish, turtles and other wildlife species, and places of quiet and respite for our human inhabitants in the most densely populated and impoverished urban neighborhoods.

The Rhode Island Rivers Council and the Woonasquatucket River Watershed Council have the goal of achieving a fishable, swimmable Woonasquatucket River by 2020. Governor Carcieri is even more ambitious. In his Charge to the Bay and Watershed Planning Commission, and Governor set specific restoration goals for the Woonasquatucket and other rivers.

"By 2015, restore the Blackstone, **Woonasquatucket** and Wood-Pawcatuck rivers to fishable/swimmable."

Significant time and resources have already been invested in the restoration of the Woonasquatucket River. Public and Private investments in the Woonasquatucket River Greenway in Johnston and Providence have totaled over \$13.2 million.

The Environmental Protection Agency, through Brownfield Pilot programs, the Brownfield Showcase Community program, and grants for wetland classification and prioritization has invested over \$1 million in the Woonasquatucket River watershed area, most focused in Johnston and Providence. The \$3.8 million bike path in Johnston and Providence is funded by the state and federal government. HUD contributed \$1 million for the cleanup of a Brownfield site which will serve over 500 youth under the age of 18 who live in housing projects in Providence. Departments of the State of Rhode Island have invested over \$1 million in the Project, and the City of Providence committed \$2.6 million to the development of the Greenway Project. Private funding for site planning and improvements, programming, education and project coordination over a 10 year period has totaled over \$3.5 million.

The investment of the city, state and federal government in the Woonasquatucket River and its adjacent land has been more than matched by over \$220 million in private investments in formerly neglected and abandoned areas in Providence.

In Providence and Johnston, 52 acres of land have been restored for passive and active recreation opportunities along the River. One canoe launch site is schedule for construction in 2004, and additional sites have been targeted. The Riverside Mills Brownfield site will be the location of a large neighborhood park and bike path. Previously abandoned properties adjacent to the park will be developed to provide 53 affordable housing units for area residents. Wetlands and riparian buffers are being restored, and in spite of the years of abuse, the river habitat in our most urban neighborhoods supports fish and wildlife. At one restored city park along the river in Providence, over 100 species of birds have been identified.

A bicycle path along the river from Waterplace Park in downtown Providence to Lyman Avenue in Johnston is scheduled to begin construction in 2005. It will link existing parks, restored Brownfield sites, and the neighborhoods along the river. The town of Johnston received an open space grant to acquire 22 acres of land along the river for recreation and river access, however recent disclosures of actionable levels of dioxin at the site have put these plans on hold.

In the future, this site, with its wetlands and nesting habitat, will offer exceptional opportunities as an outdoor environmental classroom.

The State of Rhode Island secured four planning grants to establish the critical information necessary for implementing restoration projects. The EPA funded a pilot freshwater wetland study to develop criteria for evaluating wetland restoration potential and to prioritize projects within the watershed. Over one hundred forty sites are now prioritized. The US Forest Service funded a riparian buffer study of the watershed, selecting 36 sites for priority restoration potential. RI DEM oversaw a Greenspace study for all of the watershed communities, identifying opportunities for environmental preservation, recreational opportunities, and greenway linkages through all the watershed communities. An EPA Smart Growth grant was awarded to DEM to work with the Council and the community to integrate the Council's Brownfield revitalization and river protection plans into the Providence Comprehensive Plan and Zoning Code.

As a result of the wetland and riparian buffer studies, we were able to secure three WHIP grants from the NRCS to restore riparian buffers in Providence and North Providence. The town of Johnston will be working with a consultant funded by RI DEM to integrate greenspace planning into their comprehensive plan. And the Council will be working with watershed Land Trusts to integrate land acquisition plans and promote watershed protection.

We are working with the owners of the first two dams along the river to secure funding to study the feasibility of creating fish and canoe passages at these dams.

The Council knows that regardless of signs and fences, our populations are going to use the Woonasquatucket River as a recreational resource.

4. Ideas about how EPA can best disseminate site-related information and provide opportunities for meaningful involvement.

In addition to proposals we will make to the MAC, the Council recommends that EPA consider broadening its distribution of newsletters and information. Individuals who access the river and fenced off areas in North Providence, Johnston and Providence do not necessarily live in the area defined by EPA as the area of impact. The council has a mailing list of over 1000 watershed residents that could benefit from receiving regular information about the process and results to date. The newsletter should also be posted on the EPA Centredale website.

5. Recommendations for improvement.

The Council is developing proposals for consideration by the Management Action Committee to enhance the flow of information and participation by the community in the ongoing proceedings. We do not have additional recommendations at this time. We anticipate that this level of communication regarding the Centredale/Woonasquatucket site will continue, and we look forward to continuing our participation in this process in collaboration with the EPA, state and local agencies, and the residents of the impacted communities.