

Superfund Records Center  
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STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS  
HISTORICAL PRESERVATION & HERITAGE COMMISSION

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August 4, 2010

Anna Krasko  
US Environmental Protection Agency  
5 Post Office Square, Suite 100  
Mail Code OSRR07-1  
Boston, MA 02109-3912

Re: Centredale Manor Restoration Project  
North Providence, RI

Dear Ms. Krasko:

I am writing in response to your July 19, 2010 telephone conversation and e-mail correspondence with Richard Greenwood of the Rhode Island Historical Preservation and Heritage Commission staff concerning the Centredale Manor Restoration Project and the Interim Final Feasibility Study for the remediation of the Centredale Manor Superfund site. Your telephone call was the first notification from the EPA to the RISHPO about this federally funded undertaking, although we understand that the feasibility study began in 2004 and the report was issued on April 30, 2010.

A review of the feasibility study reveals it contains serious deficiencies and errors with regard to cultural resources (i.e. historic and archaeological properties), which in turn reflects a fundamental deficiency in EPA's procedures for environmental impact analysis. The failure to incorporate an appropriate level of cultural resource identification and evaluation into the study has led to a failure to identify and address potential adverse effects to significant historic resources.

The first and most basic flaw we have identified in the report is the failure to include the comprehensive federal requirement regarding cultural resources, the National Historic Preservation Act, as amended (PL 89-665; 16 U.S.C. 470), as well as the comparable state requirement, the Rhode Island Historic Preservation Act (General Laws of Rhode Island 42-45 *et seq.*) in Section 3.2 and Table 3-1 which establish the undertaking's **Applicable or Relevant and Appropriate Requirements (ARARs)**.

Both of these environmental regulations give the lead agency for an undertaking the responsibility to notify the SHPO and other relevant parties of the undertaking, to identify and evaluate potential cultural resources in the project's area of potential effect and to assess the potential effects that the undertaking may have on any significant resources. The identification, evaluation and assessment of resources and potential impacts are all to be carried out in consultation with the SHPO and other relevant parties. The study that has been produced has complied with none of these regulations and the assertion made in Table 3-1 that the project area contains no known areas with potential to contain significant archaeological or historical artifacts is baseless and contradicted by the information in our survey files.



The principal historic resources that needed to be considered within the area of potential effect are the Allendale Historic District and the Lymansville Company Mill. Maps showing the two resources are attached for your information.

The Allendale Historic District consists of the early 19<sup>th</sup> century mill village that grew up around the Allendale Mill. In addition to the mill, the district contains a number of workers cottages, a store and a chapel. The mill pond is a contributing resource in the district both as an integral part of the mill's historic water power system and as a prominent feature in the village landscape. The Allendale Mill has been individually listed on the National Register of Historic Places and the historic district is considered eligible for the National Register.

The Lymansville Company Mill is a late 19<sup>th</sup>-century factory that possesses significance in the state's textile manufacturing history. It is considered potentially eligible for listing on the National Register of Historic Places and the mill owners are currently undertaking the preparation of a National Register nomination.

There is also the potential that the area of potential impact may contain undisturbed archaeological resources associated with pre-colonial, colonial and industrial era occupations along the riverside.

The proposed remediation measures involving capping, excavation, dam removal and other significant alterations of the mill ponds and riverbanks in the Allendale Historic District and the immediate environs of the Lymansville Mill have the potential to adversely affect significant historic features and potential archaeological resources. The Interim Final Feasibility Study needs to be amended so that these impacts are identified and assessed and if adverse effects are present, then measures to avoid or mitigate them need to be developed in consultation with this office and other relevant parties.

These comments are provided in accordance with Section 106 of the National Historic Preservation Act. If you have any questions or comments, please contact Jeffrey Emidy, Project Review Coordinator of this office.

Very truly yours,

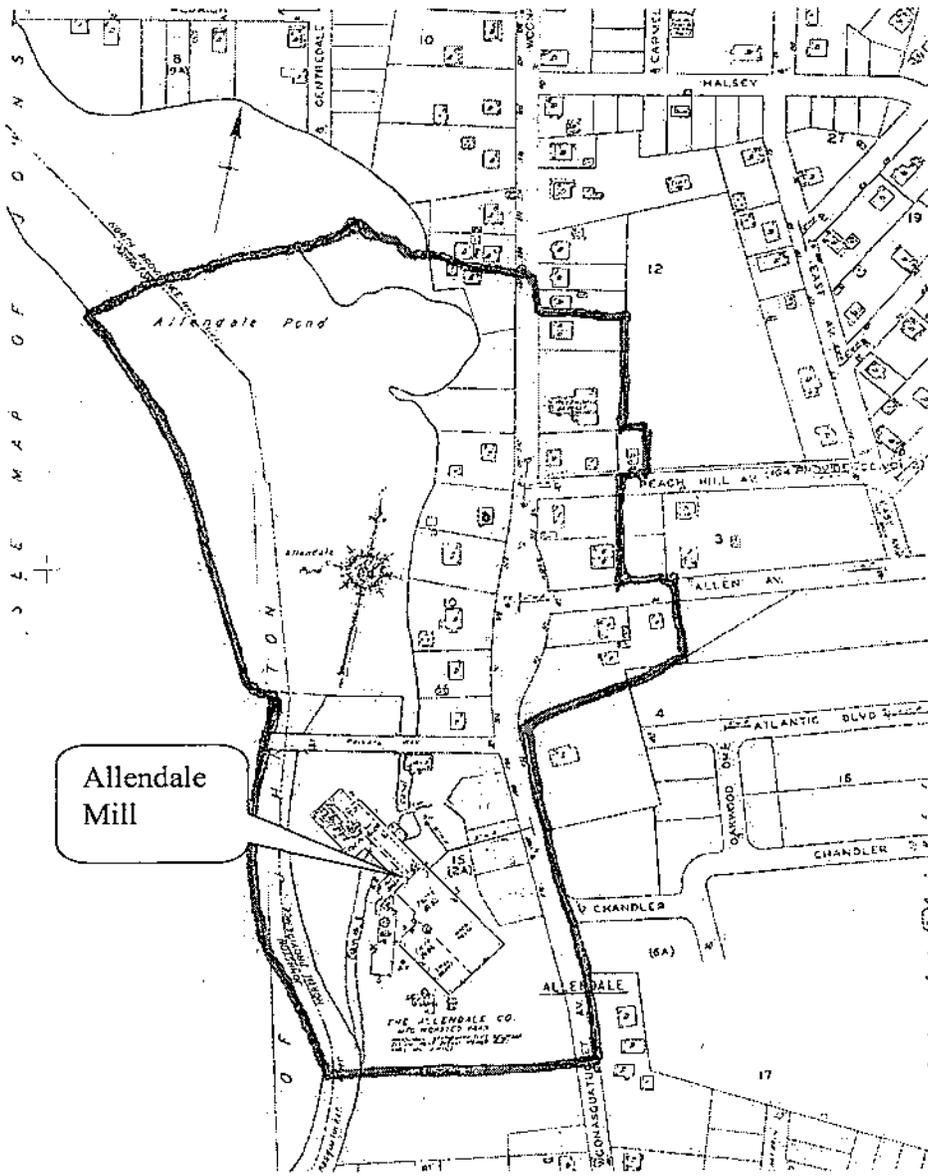


Edward F. Sanderson  
Executive Director  
Deputy State Historic Preservation Officer

Attachment

C: Curt Spaulding, EPA Region 1  
Anemone Mars, NITHPO  
Alicia Lehrer, Woonasquatucket Watershed Council

(100804.02)



Allendale Historic District  
Considered Eligible for listing on the National Register of Historic Places



Lymanville Company Mill  
Considered Eligible for the National Register of Historic Places