



BLACKSTONE RIVER VALLEY

National Heritage Corridor

October 10, 2014

Mr. David J. Newton
EPA New England
5 Post Office Square, Suite 100
Boston, MA 02109-3912

RE: Peterson/Puritan, Inc Superfund Site OU 2

Dear Mr. Newton

In 1986, Congress established the John H. Chafee Blackstone River Valley National Heritage Corridor to acknowledge the nationally significant heritage of the Blackstone River Valley, the Birthplace of the American Industrial Revolution. The Blackstone Heritage Corridor is a program of successful partnerships between federal, state and local governments, and non-governmental organizations, all of which work together pursuing a common agenda for preservation and revitalization.

The US EPA is currently inviting comment on the proposal to select its cleanup approach at Operable Unit 2 of the Peterson/Puritan, Inc. Superfund Site. On behalf of all who enjoy the Blackstone River for passive and active recreational use, we appreciate the opportunity to again express our view that any remediation plan must include two key elements.

- First, the plan must call for an approach that makes the site environmentally safe. While certainly the site is being evaluated as an effort to close and presumptively “cap” a landfill, this particular landfill is adjacent to and part of the floodplain of one of America’s Heritage Rivers.
- Second, the approach must allow for continued access to and from the Blackstone River and its shores for recreation and tourism. Enhancing public access and enjoyment of the natural resources of the Blackstone River Valley National Heritage Corridor is a critical goal of our Congressional mandate.

In recent years, the Blackstone has seen a renaissance as its health has continued to improve. This did not happen by accident, of course. The Blackstone River Valley National Heritage Corridor Commission worked since its inception in 1986 to support our partners’ efforts in this

regard. Wildlife has returned, people enjoy canoeing and kayaking in the river itself, and they are hiking and riding their bicycles along its banks. And we have witnessed extraordinary progress in the initiative to make the Blackstone River “fishable and swimmable.” Thirty years ago no one would have believed any of this was possible. The progress along the River only highlights the stakes involved for making the right decision about clean-up plans.

The final clean-up plan for the Peterson/Puritan OU-2 site must recognize, embrace and advance the longstanding and continued commitment to steward the resources of our National Heritage Corridor.

The stated goals of a safe and accessible river experience are not mutually exclusive. Whether considering environmental remediation, heritage preservation or economic development, we must be willing to embrace the value of the river valley landscape and integrate it into our approach and implementation. The Ashton Pratt Corridor Redevelopment Plan, adopted by both Lincoln and Cumberland RI and available on the EPA’s web site reflects this position and outlines several key areas of concern and opportunity. We support a clean-up plan that is consistent with and advances this Plan.

The clean-up effort of the Peterson-Puritan site is one more piece of our efforts to clean up the Blackstone and restore it as an integral part of our communities. Given our local, regional and national progress, it is imperative that a clean-up plan must include provisions to keep the River landscape open and accessible to all. It is our position that, at a minimum:

- Scenic paths accessible to the public should be provided.
- These cleanup areas can and should be vegetated with native grasses and bushes that promote and support local habitats, while functioning to stabilize the slopes and sites.
- The toes of the landfill slopes should be designed in such a manner as to facilitate river-side access; they should not be steeper than 3 horizontal : 1 vertical, and
- There should be no physical or psychological barriers to accessing the properties.
- Grading is important to stabilize the site, facilitate public access and also support the efforts of emergency personnel who rely on this access point to provide life-saving assistance in and along this portion of the river. Accordingly, access to – and from – the river must be designed and constructed in a manner to support emergency operations.
- The proposal to plant trees in the floodplain must be evaluated in greater detail. While doing so can enhance the river user experience, and provide shade canopy which in turn supports wildlife habitats, there is also the risk of introducing vegetative debris that further challenges the river, particularly during storm events.

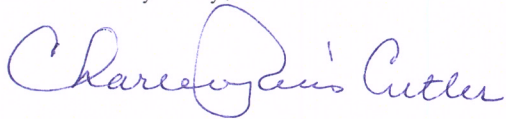
These are important consideration both from an environmental standpoint, and also from an economic one. A denuded landscape along this National Heritage Corridor results in a de facto barrier, which in turn constitutes a blight on this most valued national resource. We have the opportunity to remedy the site conditions in a manner that protects our natural resources, enhances our interaction with our heritage, and promotes our local and regional economies.

It is our goal to achieve a healthy and safe environmental condition in and along the Blackstone River, and we are grateful to the EPA for their efforts in this regard. No less vitally important, Congress established goals requiring that we promote our heritage landscape, preserve our natural resources, and provide accessible recreational and interpretive opportunities.

Depicting this information through illustrative site/concept plans will provide the opportunity for us to determine consistency with those Congressional goals, and to consider whether the proposed solution avoids a significant adverse impact to the resources of our National Heritage Corridor. Clearly there is additional plan information required. We look forward to those plans being provided so that we may continue with our review.

These comments are offered as the designated management entity for the National Heritage Corridor, and also pursuant to Public Law 99-647 as amended, Section 9, to assist your assessment of this project. When plans become available to facilitate our review and further comment, or if you have any questions, please do not hesitate to contact our Community Planner, Megan DiPrete by email (Megan_DiPrete@partner.nps.gov) or by phone (401-762-0250 ext 5703).

Yours very truly,



Charlene Perkins Cutler
Executive Director