For a thriving New England



CLF Rhode Island

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July 9, 2024

Via Electronic Mail: lauren_imgrund@nps.gov

Lauren S. Imgrund

Associate Director Partnerships and Civic Engagement National Park Service 1849 C Street NW Washington, DC 20240

Re: Conservation Law Foundation's Response to the Rhode Island Department of Environmental Management and the City of Pawtucket's June 27, 2024, Letter to You Regarding:

Conversion Request Pawtucket, RI

LWCF Files: 44-00051 – Development (McCov Stadium 1970)

44-00131 – Acquisition (3.1 a at South Woodlawn 1971) 44-00152 – Development (5.2 a at South Woodlawn 1971) 44-00247 - Development (Dunnell Park/Hank Soar Field 1980)

Dear Associate Director Imgrund:

Conservation Law Foundation ("CLF") received the June 27, 2024 letter that Terrence Gray, P.E., Director, Rhode Island Department of Environmental Management ("RIDEM") and Donald Grebien, Mayor, City of Pawtucket ("City") sent you (the "Letter"), which followed up on RIDEM's June 6, 2024 request ("RIDEM June 6th Letter"). In the Letter, RIDEM and the City wrote to "seek guidance on addressing environmental justice concerns that were raised in comments received from the public" regarding the South Woodlawn site. RIDEM and the City assert that the City provided a comprehensive package that includes a Compliance and Stewardship Form along with several detailed appendices (hereinafter collectively referred to as the "C&S") and that "this application is complete based upon [their] understanding of the [National Park Service] requirements." This assertion by RIDEM and the City is false and unsupported by the record.

¹ See June 6, 2024 Letter from RIDEM to Samuel Roberts, AICP, National Park Service – Interior Region 2 ("June 6 RIDEM Letter").

² June 27, 2024 Letter from RIDEM to Samuel Roberts, AICP, National Park Service – Interior Region 2.

³ *Id*.



On February 2, 2024, CLF provided its public comment to the City detailing why the conversion of the South Woodlawn site (hereinafter "Morley Field") is illegal and RIDEM and the National Park Service ("NPS") should deny the City's conversion application ("CLF Public Comment"). On May 21, 2024, CLF mailed Bob Ratcliffe, Division Chief, Conservation and Outdoor Recreation Division Office, NPS and Terrence Gray, RIDEM, a 13-page letter (and copies of all supporting documents) requesting RIDEM to recommend the denial of the City's 2024 conversion application to NPS and setting forth CLF's legal arguments supporting this request ("CLF May 21st Letter"). On June 6, 2024, CLF mailed a letter to Samuel Roberts and Gay Vietzke of NPS ("CLF June 6th Letter) refuting the assertions made in the RIDEM June 6th Letter. Because of the misleading nature of the City's Conversion Application, it is imperative that NPS consider the CLF Public Comment, the CLF May 21st Letter, the CLF June 6th Letter, this letter to you, and all supporting documentation and materials previously provided and provided with this correspondence, when making its decision concerning the City's conversion application for Morley Field. CLF also requests the opportunity to meet with officials from NPS, the U.S. Department of the Interior ("DOI"), RIDEM, and the City to provide further context and information prior to NPS advising RIDEM on the application.

I. The City's Alleged Justification for Converting Morley Field Stems Specifically From Its Failure to Maintain Morley Field in Compliance with the Requirements of the L&WCF.

According to the City, declining use of Morley Field over the last 30 years is the main reason for the proposed conversion. The City claims the last permit for Morley Field was issued in 2021 to a youth football team, most likely the Oakwood Raiders, but the team subsequently moved to Max Read Field, a newly developed City recreation facility. However, not only are these statements presented to bolster the City's argument for its proposed conversion, they are also specifically designed to be misleading. While the Oakwood Raiders youth football league did move to Max Read Field, it was because the City told them they must. According to testimony made by many residents of the Woodlawn Neighborhood – Pawtucket District 5 –the City's intentional neglect of Morley Field has led to the declining usage. In the Spring of 2022, shortly after the City told the youth football team to move, the City officially closed Morley Field and erected a chain link fence surrounding Morley Field to stop the public from using it. Accordingly, NPS should find that the City breached its obligations under the Land and Water

⁴ Steve Ahlquist, *Rally to save Morley Field shows opposition to paving greenspace gaining momentum*, UPRISE RI (Sept. 4, 2022, 2:43pm), https://upriseri.com/rally-to-save-morley-field-greenspace-pawtucket/. The electronic version of this article contains video links of Pawtucket City Residents testifying to the City's specific actions to drive down usage of Morley Field. Some of these residents include: District 5 Councilmember Clovis Gregor, Pawtucket Councilmember Melissa DaRosa, Jennifer Stewart - State Representative, District 59 Pawtucket, John Santos – Executive Director of the Oakwood Raiders, Reilly Shivers - Tollman High School graduate, Molly Henry from American Forests testifying that District 5 has the lowest "Tree Equity Score" in the State of Rhode Island, and Greg Gerritt – River Steward for the Moshassuck River, which is adjacent to Morley Field. Note, based on the video testimony of John Santos, CLF drew the conclusion that it was the Oakwood Raiders that pulled the last permit to use Morley Field in 2021.



Conservation Fund Act (the "Act") at 54 U.S.C. § 200301 et seq., 36 C.F.R. Part 59, and 2 C.F.R. § 200.316 because:

- (a) the City failed to retain and use the Morley Field Conversion Parcel for public outdoor recreation;
- (b) the City failed to maintain the Morley Field Conversion Parcel so as to appear attractive and inviting to the public;
- (c) the City failed to maintain the sanitation and sanitary facilities of the Morley Field Conversion Parcel in accordance with applicable health standards; and
- (d) the City failed to keep the Morley Field Conversion Parcel reasonably open, accessible, and safe for public use.

It would be a perversion of the Act for NPS to grant the City's conversion application when it was the City that purposely created the conditions to make the conversion of Morley Field possible.

This perversion becomes even more apparent when one considers what will replace Morley Field—the only green space in the District—if the conversion application is approved: a parking lot. And not just any parking lot, but a parking lot to facilitate the development of One Moshassuck Street, the lot adjacent to Morley Field, into a 159,562 square foot, 24 hour-a-day, 7-day-a-week, warehouse and distribution facility ("Last Mile Distribution Facility").

The fact that the City summarily dismisses the two alternative options for Morley Field in the C&S reinforces the idea that the City had long planned to remove Morley Field. For example, the first option discussed would be to leave Morley Field in its current condition. However, the City dismisses this option due to the lack of use of Morley Field, suggesting Morley Field does not serve the recreation needs of the City. However, as noted above, it was the deliberate actions of the City itself that left Morley Field in its current condition. The second option discussed would be to renovate Morley Field to reestablish its use as a multi-use youth sports field with an improved facility. The City similarly dismisses this option, noting that it also would not meet the current recreation needs of the City because the City has new facilities at Max Reed Field (over one mile away) and therefore it would not make fiscal sense to invest resources into Morley Field for parallel purposes. Instead, the City proposes to reuse a portion of Morley Field for a passive open space with infrastructure, including electricity and water hookups, to serve as a community event space. According to Pawtucket Mayor Grebien, the cost estimate for remediating this portion of Morley field is between \$1 million and \$2 million.⁵

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⁵ See Wheeler Cowperthwaite, Sale of Moley Field hits roadblock as residents speak out against plans, THE PROVIDENCE JOURNAL (Sept. 21, 2022, 5:00AM),

https://www.providencejournal.com/story/news/local/2022/09/21/efforts-save-morley-field-pawtucket-boost-state-law-plan-turn-field-parking-lot/10426582002/.



If the City is willing to spend up to \$2 million to remediate a portion of Morley Field for passive open space, then the City has an obligation to at least **consider** spending that money to remediate all of Morley Field. In fact, if the City chose to renovate Morley Field and did not seek to convert any portion of it, the City's conversion application for McCoy Stadium and Dunnel Park would not be prejudiced and the City could still benefit from developing the new Riverside Park. Viewed in this light, there is no justification under the Act to convert *any* portion of Morley Field. The real reason for the City's actions are crystal clear: the City wants to sacrifice the environmental justice ("EJ") needs of District 5 to the business needs of J.K. Equities and its Last Mile Distribution Facility, which will not only take away recreational green space from nearby residents but will burden the community with noise and air pollution from a constant stream of vehicles traveling back and forth to the facility.

II. The City's Environmental Resources Survey is Superficial and Facially Inadequate.

A. Air Quality

In reaching its conclusion that the conversion, if approved, will have "no impact or potential for some improvement" in the Environmental Resources Survey, the City relies on data that averages the air quality of a large geographic area, rather than focusing on the air quality affecting the people who live in District 5. For example, the City relied solely on the 2023 EPA Green Book; 2022 EPA Air Quality Index Report for its data source. In particular, Appendix C to the C&S states that "the Providence-Warren Core-Based Statistical Area (CBSA), where Morley Field is located, has an air quality index (AQI) below 50, indicative of 'good air quality' as of 2022." The City goes on to note that "no part of Rhode Island is listed as a nonattainment area for any criteria pollutants or is listed as an 'area that does not meet (or that contributes to ambient air quality in a nearby area that does not meet) the national primary or secondary ambient air quality standard for a National Ambient Air Quality Standard " The problem with relying solely on the EPA 2022 Air Quality Index Report is its inherent lack of granularity. The CBSA for Rhode Island includes the whole state and a portion of Southeast Massachusetts and District 5 makes up less than one percent of that size. It is disingenuous in the extreme to group District 5 into such a large geographical area to say there are no air quality issues, with no discussion or study of the air quality in the immediate vicinity of where Morley Field is located.

No one can credibly argue that Rhode Island has no specific geographic areas that are burdened by poor air quality, nor can anyone argue that many of these poor air quality areas are compounded by the cumulative effect of multiple sources of polluting emissions concentrated in that particular area. For instance, CLF has been working extensively with RIDEM regarding the chronic air quality issues plaguing the EJ neighborhoods in and around the greater Port of Providence area in Providence. Like District 5, the greater Port of Providence area is made up of EJ neighborhoods. Its poor air quality is exacerbated by its immediate proximity to Interstate 95, one of the leading sources of air pollution in Rhode Island, and its location in an industrial zone. However, the community in the Port of Providence area has had the benefit of extensive



community scale air toxics monitoring. Here, the C&S mentions nothing about any air pollution monitoring occurring in District 5, despite the fact that it is also located in an EJ neighborhood and an industrial area and is immediately proximate to Interstate 95. The most conspicuous lack of information in the C&S, however, relates to what will happen if the conversion application is approved: 65% of the Morley Field green space will be replaced with a concrete heat island to serve as a parking facility to the adjacent Last Mile Distribution Facility with all of its resulting diesel exhaust emissions, fugitive dust, sound and light pollution. It is simply not credible to say that removing the area's only green space to create a parking lot for a 24/7 distribution facility will not affect—or may potentially *improve*—air quality in and around Morley Field.

B. Circulation & Transportation

The application states that, if approved, there will be "no impact or potential for some improvement" on Circulation and Transportation around what was once Morley Field. However, once converted, the remaining 35% of Morley Field will be accessible to the residents of District 5 only via Grenville Street, which intersects with heavily trafficked Main Street. In addition, as noted above, the Morley Field site will serve as a parking lot to a shipping distribution facility, which will necessarily impact circulation and traffic in the area. It is implausible to say there will be no impact to circulation and transportation, much less "potential for some improvement."

C. Climate

Amazingly, the City concludes there will be "no impact or potential for some improvement" on "Climate" if the application is approved. The only mention of post-conversion activities which might affect Climate that the City addresses relate to "specific construction management practices" that "will be determined during the design and permitting phases of this project." This vague statement is essentially meaningless and impossible to evaluate in terms of Climate impact. In addition, there is no mention of what effect turning 65% of Morley Field into a concrete heat island to support a Last Mile Distribution Facility will have. The City goes on to note that green space, plantings, and trees in the remaining 35% of Morley Field may assist with mitigating climate change impacts; not converting any portion of Morley Field would be even more effective.

D. Endangered Species

The City states in the application that the conversion, if approved, would have "no impact or potential for some improvement" on endangered species. Morley Field has been and is an ongoing nesting spot for Ospreys.⁶ While CLF recognizes that Ospreys are generally no longer

⁶ See June 2024 video by Greg Gerritt – River Steward for the Moshassuck River, which is adjacent to Morley Field: https://www.youtube.com/watch?v=eMoLp0JlbV0; see also Steve Ahlquist, Rally to save Morley Field shows opposition to paving greenspace gaining momentum, UPRISE RI (Sept. 4, 2022, 2:43PM), https://upriseri.com/rally-to-save-morley-field-greenspace-pawtucket/. The electronic version of this article contains video links including one about Ospreys nesting at Morley Field.



considered an endangered species due to recent successful recovery measures, the Osprey is specifically protected under The Migratory Bird Treaty Act. CLF has been informed that the City has received proof of Ospreys using Morley Field for their nesting habitat, making the lack of inclusion of such information in the application dismaying.

> E. *Environmental Justice Section of C&W and Appendix B – Social Equity* Discussion – to C&W

The City recognizes that District 5 "serve[s] residents within census tracts that meet various federal and state criteria for vulnerable populations," and as authority for this assertion, the City cites to the Justice 40 Climate and Economic Justice Screening Tool, RIDEM-designated Environmental Justice (EJ) Focus Areas, and HUD-designated "Low and Moderate Income" census tracts. Nevertheless, the City then proceeds to repeat its narrative (see Section I above) that Morley Field is infrequently used and remarks that District 5 residents will be better off with a parking lot than with a green space because they can use a new park space over a mile away. Based upon this supposed analysis, the City then concludes that there will be no EJ impact or potential for some improvement. In addition to making no logical sense, this conclusion violates the spirit of the authorities on which it relies, as discussed in more detail below.

On September 28, 2023, RIDEM published a detailed six-page EJ Policy.⁸ Furthermore, on April 21, 2023, President Biden signed Executive Order No. 14096, Revitalizing Our Nation's Commitment to Environmental Justice for All. A careful review of RIDEM's EJ Policy and Executive Order No. 14096 confirms it is clear that: (1) RIDEM's EJ Policy applies to RIDEM's review of and conclusions on the City's conversion application; and (2) Executive Order No. 14096 directly impacts NPS's considerations of the City's conversion application.

RIDEM's EJ Policy states that "DEM's ongoing obligation is to incorporate EJ considerations into all the Department's programs, policies, and activities, and elevate important environmental issues that have a significant impact on EJ focus areas." As stated in this EJ Policy: "striving to address inequities in EJ focus areas . . . can only be achieved through the implementation of measurable goals and meaningful community involvement." Similarly, Executive Order No. 14096 admonishes that: "pursuing these and other objectives integral to advancing environmental justice can successfully occur only through meaningful engagement and collaboration with underserved and overburdened communities to address the adverse conditions they experience and ensure they do not face additional disproportionate burdens or underinvestment."

⁷ The Migratory Bird Treaty Act of 1918, 16 U.S.C. §§ 703–712.

⁸ Department of Environmental Management Environmental Justice Policy, R.I. DEP'T OF ENV'T MGMT. (Sept. 28, 2023), available at https://dem.ri.gov/sites/g/files/xkgbur861/files/2023-09/ridem-environmental-justice-

policy 0.pdf. ⁹ According to the C&W, District 5 has a minority population of 82% and a median household income of less than 65% of the statewide median household income, which meets the definition of EJ Focus Area with RIDEM's EJ Policy.



CLF has received complaints from many residents of District 5 that there was absolutely no meaningful engagement or community involvement by the City with residents of District 5 regarding the conversion of Morley Field. In this regard, the City begrudgingly offered only one public comment period to its conversion application and, initially, refused to publish the majority of public comments the City received, including the comment provided by CLF. In fact, the City received 175 public comments—174 against the conversion of Morley Field and 1 in favor of conversion.

RIDEM's EJ Policy and Executive Order No. 14096 are meant to be more than just some new "check the box" item on an existing government form. They are designed to usher in a new understanding and inclusive way of involving community stakeholders with actual say and input into government decisions and actions that affect them, especially where, for decades, these communities have borne the brunt of the negative environmental impacts of government decision-making. These policies are designed to hold government decision makers accountable to receiving, engaging with, and ultimately responding to feedback from the affected community. The conversion application's lack of reference to or detailed discussion of the residents' concerns is proof of the City being woefully inadequate in meeting this standard and should contribute to the basis for a denial by NPS.

Additionally, other states in the New England region are leading the nation in addressing state-level EJ concerns. For example, in just the past three years or so, Massachusetts (in 2021), ¹⁰ Vermont (in 2022), ¹¹ and Connecticut (in 2023) ¹² have each passed comprehensive EJ laws mandating a focus on engaging with and protecting EJ communities from disproportionate environmental impacts and hazards. Following the lead of these other New England states, Rhode Island should enact its own EJ law rather than it just being words on paper. Until such a law exists, the State should follow its EJ Policy to show its commitment to EJ principles.

F. Migratory Birds

The City states that there will be "no impact or potential for some improvement" on migratory birds from the potential conversion of Morley Field. However, as noted above in Section II D: Endangered Species, the City does not mention the fact that Morley Field is currently being used by and is a nesting habitat for Ospreys, a species protected by the Migratory Bird Treaty Act. If the conversion application is granted, the conversion of 65% of Morley Field to a parking lot will destroy the Osprey nesting habitat.

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¹⁰ An Act Creating a Next-Generation Roadmap for Massachusetts Climate Policy, 2021 Mass. Acts, ch. 8, *available at* https://malegislature.gov/Laws/SessionLaws/Acts/2021/Chapter8.

¹¹ V.S.A. 3, ch 72, available at https://legislature.vermont.gov/statutes/fullchapter/03/072.

¹² An Act Concerning the Environmental Justice Program of the Department of Energy and Environmental Protection, S.B. No.1147, *available at*

https://www.cga.ct.gov/asp/cgabillstatus/cgabillstatus.asp?selBillType=Bill&which_year=2023&bill_num=1147.



G. Sound/Noise Impacts

The City states that there will be "no impact or potential for some improvement" on sound if the application is approved. However, the City provides no information about how removing a vegetative green space and creating a large, paved parking lot for the Last Mile Distribution Facility will have no impact on noise and possibly some potential for improvement. Without some explanation, this conclusion defies logic.

H. Water: Stream Flow Characteristics

The City notes that Morley Field is adjacent to the Moshassuck River. However, the City does not mention that the conversion of 65% of Morley Field will eliminate the only public access point to the Moshassuck River, nor does the City consider how the creation of 3.1 acres of impervious surface right next to a waterbody will potentially contribute to flooding, especially in this age of increased intensity, frequency, and duration of rain events.

I. Water: Wetlands & Floodplains

The City states that the conversion will have "no impact or potential for some improvement." Again, the City provides no analysis to support this conclusion and it is hard to imagine how replacing a natural habitat and green space with a concrete heat island and impervious surface will have no impact or improve area wetlands and floodplains.

III. Table 2 of the C&W

Table 2 is a list of mandatory impact criteria that preclude the use of a categorical exclusion under the National Environmental Policy Act ("NEPA"). The City checked the "No" box for each item on this Table to avoid having to prepare an Environmental Assessment ("EA") or Environmental Impact Statement ("EIS") under NEPA. CLF takes issue with the following "No" choices on that list:

1. Have significant impacts on public health and safety?

Conversion of 65% of Morley Field and turning it into a paved parking lot will substantially contribute to the heat island effect within District 5. "Structures such as buildings, roads, and other infrastructure absorb and re-emit the sun's heat more than natural landscapes such as forests and water bodies . . . areas, where these structures are highly concentrated and greenery is limited, become 'islands' of higher temperatures relative to outlying areas." A paved parking lot will also contribute an enormous amount of impervious surface that is highly likely to increase (likely contaminated) stormwater runoff and lead to increased risk of flooding.

¹³ What are Heat Islands?, U.S. ENV'T PROT. AGENCY, https://www.epa.gov/heatislands/learn-about-heatislands/heat-islands (last updated on August 28, 2023).



Moreover, the development of a HVAC heated and cooled Last Mile Distribution Facility on the lot adjoining Morley Field will generate its own substantial amount of human-generated heat that will further exacerbate this heat island effect. According to the U.S. Environmental Protection Agency, heat islands can affect a community's environment and quality of life in multiple ways, including: increased energy consumption, elevated emissions of air pollutants and greenhouse gases, compromised human health and comfort, and impaired water quality. ¹⁴ The detrimental effects to District 5 residents from the development of this heat island warrants further analysis from an EA or EIS.

Moreover, lack of access to green space is a health and safety issue that predominantly affects EJ communities. "Being in a green space has the power to nurture human health. Spending at least 120 minutes per week in nature can lower risks for cardiovascular disease, mental distress, and myopia among children according to an article published in the 2019 issue of Nature. Simply, living near green spaces reduces the risk for mortality, according to a 2019 Lancet Planetary Health study. Parks serving majority low-income households are four times more crowded than parks in wealthy neighborhoods, according to a 2020 study by the Trust for Public Land. Communities of color are three times as likely to live in nature-deprived areas as white Americans, according to a 2020 study by the Center for American Progress and Hispanic Access Foundation." Removing a green space and replacing it with a parking lot robs residents of a no-cost health benefit and should, at a minimum, be evaluated through an EA or EIS.

8. Have significant impacts on species listed or proposed to be listed on the List of Endangered or Threatened Species, or have significant impacts on designated Critical Habitat for these species?

See discussion above about on-going use of Morley Field by Ospreys and the nesting habitat of Ospreys at Morley Field. The significant impacts on the Osprey living near/on Morley Field warrant an EA or EIS.

10. Have a disproportionately high and adverse effect on low income or minority populations (Executive Order 12898)?

See discussion above on EJ.

IV. State Comprehensive Outdoor Recreation Plan ("SCORP")

In the C&S, the City sets forth the four overarching goals of SCORP and then details how it believes the conversion application is meeting the recreational needs of the residents of Pawtucket. However, the City fails to mention that "one role of this plan is to ensure that

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¹⁴ *Id*

¹⁵ Sytonia Reid, *Access to Green Space is an Environmental Justice Issue*, GREEN AMERICA, https://www.greenamerica.org/access-green-space-environmental-justice-issue (last visited July 5, 2024).



existing open space and recreational resources are protected from conversion to other uses." In this respect, "requests for conversions should be resisted and should face the highest burden of proof of net public recreational benefit. Where conversion of recreation system land is considered, approval should be predicated on full administrative review and public scrutiny." Moreover, Section G of Policy 2.1 of SCORP: "Prohibit[s] the loss of recreation and open space system land through conversion to alternative uses." Additionally, Section H of Policy 2.1 of SCORP: "Prohibit[s] the conversion of land that has been dedicated to recreation and open space to alternative uses."

As noted above, *see* Section II E, full administrative review and public scrutiny has been noticeably lacking. Rather than working to prohibit a conversion of Morley Field, the City is doing everything in its power to facilitate this conversion for the benefit of a private commercial use.

V. Conclusion

CLF thanks NPS for the time and attention it takes to go through the details provided in this Letter. We respectfully request that NPS conducts due diligence in reviewing this conversion application and carefully consider the points raised in this communication.

As mentioned repeatedly above, the lack of meaningful engagement and collaboration by the City with District 5 residents about this conversion application is shocking. We noted in the June 27th Letter that both RIDEM and the City requested an opportunity to discuss these matters further with appropriate individuals in leadership positions at DOI and NPS. Should RIDEM and the City's request be granted, we ask that representatives of CLF and/or select members of the affected community also be a party to these discussions.

Sincerely yours,

Richard Stang Senior Attorney

Conservation Law Foundation

cc: Terry Gray, Director, RI Dept. of Environmental Management

¹⁶ Ocean State Outdoors: Rhode Island's Comprehensive Outdoor Recreation Plan: State Guide Plan Element 152, R.I. DIV. OF STATEWIDE PLANNING 10 (Aug. 29, 2019), available at https://planning.ri.gov/sites/g/files/kkgbur826/files/documents/LU/2019/SGP-152-SCORP-2019.pdf.



Samual Roberts, AICP, Land and Water Conservation Fund, National Park Service – Interior Region 2

Gay Vietzke, Director, Region 1, National Park Service

Bob Ratcliffe, Division Chief, Conservation and Outdoor Recreation Division Office, National Park Service

Stephan Nofield, NPS National Lead; Rivers, Trails, and Conservation Assistance

Mary Kay, Chief Legal Counsel, RI Dept. of Environmental Management

The Honorable Senator Jack Reed

The Honorable Senator Sheldon Whitehouse

The Honorable Representative Gabe Amo

The Honorable Senator Meghan Kallman

The Honorable Representative Cherie Cruz

The Honorable Representative Jennifer Stewart

The Honorable Mayor Donald Grebien, City of Pawtucket

The Honorable Clovis Gregor, Ward 5 Councilmember, City of Pawtucket

Bianca Policastro, Director of Planning, City of Pawtucket

Alison Hoffman Carney, Chief, Environmental and Energy Unit, RI Attorney General

Alex Kuffner, Providence Journal

Frank Carini, EcoRI

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