



CLOVIS C. GREGOR

Councilor-District Five

118 Trenton Street
Pawtucket, RI 02860

June 15, 2022

To: David Moran, City Council President &
The Honorable Members of the Pawtucket City Council

RE: **William H. Morley Field** (94 Moshassuck Street, AP 62; Lots 291 & 309)
Blackstone Distribution Center, LLC's *(assignee of J.K. Equities) **Application for Expedited Policy for Remediation of Environmental Simple Sites submitted to the Rhode Department of Environmental Management's (RIDEM) Office of Land Revitalization & Sustainable Materials Management.**

Dear Council President and Honorable Members of the Council,

Attached, please find the expedited SIR (Site Investigation Request) application submitted by Blackstone Distribution/J.K. Equities, as the "Performing Party" in regards to environmental hazardous contamination alleged to have been discovered on two (2) locations at Morley Field.

As I understand it, Blackstone Distribution also performed the initial SI (Site Investigation) prior to submitting the expedited SIR (Site Investigation Request). The fact that this was done without any notice whatsoever to either the general public or to the Council, is disturbing enough. Even more disturbing, however, is the fact that Blackstone Distribution's SIR is specifically requesting a **PERMANENT Environmental Land Usage Restriction (ELUR)** for Morley Field.

I am deeply troubled by the deliberate concealment of this action and the way in which it unfolded. I am equally as troubled by the unilateral attempt to impose a PERMANENT land use restriction on Morley Field which would forever foreclose and deprive District 5 (Woodlawn/Oakhill) of the use and enjoyment of its ONE & ONLY public recreational greenspace. This would, effectively, amount to a taking and signify the END of Morley Field as we know it. A most unacceptable and devastating thought as well as a breach of the public trust.

As I stated, at the Council's 06/08/22 meeting, I had only recently been made aware of this most disturbing situation and was able to obtain the attached SIR report from the RIDEM. Fortunately, I also managed to get an extension of the limited (abutters-only notice) public comment period, which was set to expire on 06/09/22. As of today, I am delighted to report that it has been extended to 06/28/22. The deliberate and limited abutters-only notice and public comment period, is wholly insufficient, improper and in direct violation of Environmental Justice and greenspace equity. To be clear, Blackstone Distribution/J.K. Equities are not the owners of Morley Field. They remain the prospective purchasers of the property with no current legal right, title or authority. For Morley

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Field, as you know and by virtue of having been funded in part by NPS (National Park Service), is considered part of the Land and Water Conservation Fund (LWCF). As such, a transfer of ownership and conversion of the field for use other than public outdoor recreational use, is subject to NPS review and approval under its strict requirements process for a proposed replacement site conversion. As you also know, Blackstone Distribution/J.K. Equities' proposed purchase and replacement site conversion plan for Morley Field has yet to be identified or realized. It remains in limbo with no progress or timeline in sight. In light of that fact, I am equally as concerned as to what adverse effect a premature PERMANENT land use restriction designation would impact the contemplated (but yet unrealized) NPS process and eligibility.

I consider it a moral imperative and fiduciary obligation owed to the residents of Pawtucket. As Morley Field's rightful owners, they are deserving of a more extensive and extended public notice period than the limited (abutters-only notice) which was expeditiously sought by Blackstone Distribution. The people of Pawtucket are entitled to proper notice and an opportunity to have a say as to whether Blackstone Distribution's requested PERMANENT land use restriction is in their best interest. The Council, as representatives of the people, are equally deserving of proper notice and should have been properly consulted. As to not only the entire discretely undertaken SIR process, but, even more importantly, as to which environmental remediation option, is the most appropriate and in the people's best interest. A PERMANENT land use restriction of Morley Field, is by no stretch of the imagination in the best interest of the people whom we represent.

That having been said, I am respectfully asking that the attached SRI, together with this correspondence, be put on the Council's June 21, 2022 Docket so that this extremely urgent matter can be properly and timely addressed.

Most sincerely,


Clovis C. Gregor
Representative Councilor, District 5

cc: Richard Goldstein, City Clerk
Donald R. Grebien, Mayor
Bianca Policastro, Director of Planning & Redevelopment
Dylan Zelazo, Director of Administration

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