



For a thriving New England

CLF Rhode Island 235 Promenade Street
Suite 560, Mailbox 28
Providence, RI 02908
P: 401.351.1102
F: 401.351.1130
www.clf.org

November 11, 2024

Via Electronic Mail: mary_morrison@nps.gov; megan.diprete@dem.ri.gov

Ms. Missy Morrison
Program Manager, National Park Service
Land and Water Conservation Fund

Ms. Megan DiPrete, AICP
State Liaison Officer
Rhode Island Department of Environmental Management

Re: August 19, 2024 National Park Service (“NPS”) letter to Rhode Island Department of Environmental Management (“RIEDM”) regarding 44-00051, 44-00131, 44-00152, and 44-00207 (“NPS Letter”)

Dear Ms. Morrison and Ms. DiPrete:

CLF has reviewed and discussed the NPS Letter with several members of the environmental justice community located adjacent to Morley Field (“EJ Community”). While the NPS Letter highlighted a number of continued concerns with the City of Pawtucket’s proposed conversion of Morley Field, this letter will focus on the overriding concern that the NPS is giving too much deference to the City of Pawtucket where the City has shown through its past actions and repeated falsehoods that it cannot be trusted to engage the community fairly.

For the specific reasons set forth in Section II of this letter, the EJ Community strongly urges NPS and RIDEM to collaboratively lead and be responsible for the community engagement process that allows the community to express its concerns, needs and desires for the future use of Morely Field, and the proposed replacement property.¹

¹ Such a request is not without precedent. NPS has published an example of NPS assuming responsibility for managing a public involvement process in Stronger Together – A Manual on the Principles and Practices of Civic Engagement; National Park Service, Conservation Study Institute, 2009. https://www.nps.gov/orgs/1412/upload/stronger_together_web-508.pdf



For a thriving New England

CLF Rhode Island 235 Promenade Street
Suite 560, Mailbox 28
Providence, RI 02908
P: 401.351.1102
F: 401.351.1130
www.clf.org

I. EJ Community Recommendations Regarding NPS Conducting the Civic Engagement Process

According to NPS’s 2009 Manual on the Principals and Practices of Civic Engagement (“Manual”), civic engagement is defined “as an ongoing process of public conversation that allows people to collect information, share common values, and wrestle together with tough issues where values may be in conflict.” In this respect, public involvement “emphasizes that civic engagement goes far beyond simply meeting the minimum legal requirements for public participation.”² The lessons from the Manual are as true today in 2024 as they were in 2009. Additionally, the concept of environmental justice and how to meaningfully engage with an environmental justice community has greatly matured since 2009 and is now codified in various Executive Orders and federal publications, as well as RIDEM’s environmental justice policy.³

Drawing from these lessons, Executive Orders, publications, and policies, the EJ Community believes that any additional community-level engagement must include the following:

1. Multiple in-person public meetings in: i) easily accessible locations, ii) on public transit routes, and iii) at different times of the day (i.e. traditional lunch hour and in the evenings). All public meetings must include a virtual option that allows virtual attendees to fully participate, not just the ability to view the meetings. If languages other than English are a primary language spoken in the EJ Community, adequate interpretation and translation services must be provided at all meetings.
2. All public meetings must be professionally facilitated by an independent facilitator, chosen by NPS in collaboration with RIDEM, and an atmosphere of equal participation among all involved should be established – avoiding panels, head tables, or auditorium presentations.
3. The main purpose of the public meetings is to provide meaningful involvement to the EJ Community. Meaningful involvement must ensure direct engagement and collaboration with the EJ Community to flesh out, prioritize, and record EJ Community concerns regarding the adverse

² See *supra*, n.1.

³ See pages 6 and 7 of July 9, 2024 CLF Letter to Lauren Imgrund from NPS for discussion of RIDEM’s Environmental Justice Policy and Executive Order No. 14096 – Revitalizing Our Nation’s Commitment to Environmental Justice for All. A copy of this July 9, 2024 CLF Letter is included with this letter and incorporated herein by reference.



For a thriving New England

CLF Rhode Island 235 Promenade Street
Suite 560, Mailbox 28
Providence, RI 02908
P: 401.351.1102
F: 401.351.1130
www.clf.org

health and environmental problems resulting from the loss of one of the last green spaces serving the EJ Community by converting three acres of Morely Field into a paved parking lot. A paved parking lot with the sole purpose of facilitating 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”).

4. A full public advertisement/social media campaign must be implemented to provide timely notice (at least one month in advance) providing materials/information about the respective meetings to ensure community members have adequate time to consider their feedback. Public notice of the public meetings should be in English and any other primary languages spoken in the EJ Community and use of local media and community partnerships must be included.

5. All public meetings and public comments must be recorded and promptly published on RIDEM’s website in an easy to find location. Additionally, the public must have an opportunity to submit written comments and be informed about how their comments will be considered.

II. Why the City of Pawtucket Cannot Be Entrusted to Manage the Community-Level Engagement

There has been only one public meeting concerning Morley Field with which the City of Pawtucket has been involved. This meeting was run on behalf of the City through a group known as The Woodlawn Neighborhood Association (“Association”). However, the Association’s members are not connected to the EJ Community and are close associates of Mayor Grebien. By working through the Association, the City feigns inclusiveness of the local community and the purpose of the City’s charade becomes obvious—deceit.

The one meeting that occurred was held on April 11, 2023 at the Woodlawn Community Center, and led by consultants from the civil engineering firm of Weston & Sampson that were hired by the City.⁴ As detailed in contemporaneous notes taken by meeting attendee Steve Alquist reporting for UpriseRI, a consultant from Weston & Sampson informed attendees that the meeting was not open to the press and video taping of the event was prohibited. According to

⁴ *Battle for Morley Field: community fights to save green space from development*; UpriseRI, Steve Alquist, April 12, 2023. <https://upriseri.com/battle-for-morley-field-community-fights-to-save-green-space-from-development/>



For a thriving New England

CLF Rhode Island 235 Promenade Street
Suite 560, Mailbox 28
Providence, RI 02908
P: 401.351.1102
F: 401.351.1130
www.clf.org

Steve Alquist, the City’s consultants made clear that “the sale of around 60% of Morley Field not protected by a deed restriction was a done deal and the public has no recourse.”⁵ According to another eyewitness account of this meeting, all meeting attendees (approximately 30 in number), except for two members of the Association that opened the meeting venue and supported the City’s consultants, were vehemently opposed to the conversion of Morley Field. They provided detailed explanations as to how the EJ Community regularly uses, and depends on, Morley Field, and why the proposed replacement property is wholly inadequate.

These concerns have gone unaddressed. Moreover, none of this critical EJ Community feedback is referenced in the City’s application supporting the conversion of Morley Field. To make matters worse, Mayor Grebien continues to publish untruths about the City’s non-existent community engagement process.

On October 15, 2024, Mayor Grebien penned a letter to Gerald Catala, President of Providence NAACP (“10/15/24 NAACP Letter”), thanking Mr. Catala for contacting him “regarding preserving Morley Field as a park” (the 10/15//24 NAACP Letter was received by CLF on 10/16/24). Mayor Grebien then goes on to falsely claim, “We have spent the last year meeting with community groups, including the Woodlawn Neighborhood Association, to develop a vision for a beautifully revitalized 2-acre Morley Field.” As stated above, and in previous CLF correspondence to NPS, the only “public process” the City participated in regarding the conversion of Morley Field was the sham April 11, 2023, meeting—a meeting where all the EJ Community representatives in attendance vehemently opposed the conversion of Morley Field.

While the widely disseminated 10/15/24 NAACP Letter only references the fact that Mr. Catala contacted Mayor Grebien, it provides no details of Mr. Catala’s comments to Mayor Grebien. On October 30, 2024, Darrell Brown, CLF Vice President for Rhode Island, received via ordinary mail at his personal residence a copy of an October 8, 2024, email generated by Bradford Brown, Chairman, NAACP Providence Branch. This email (a copy of which is attached hereto and incorporated herein by reference) contains a letter from Gerald Catala to Mayor Grebien (10/08/2024 NAACP Letter). As stated by Mr. Catala, “[T]he NAACP is urging Mayor Grebien to address environmental injustice in Pawtucket by preserving Morley Field as a park. The concern is that the field’s green space is scheduled to be paved over, exacerbating the heat sink effect and highlighting the disparity between the plethora of green space in the Oak Hill

⁵ *Id.*



For a thriving New England

CLF Rhode Island 235 Promenade Street
Suite 560, Mailbox 28
Providence, RI 02908
P: 401.351.1102
F: 401.351.1130
www.clf.org

area compared to that of the Woodlawn area.” Mr. Catala also adds: [T]he NAACP argues that systemic racism is evident in the unequal distribution of green spaces across Pawtucket neighborhoods . . .”

It is evident that Mayor Grebien only references Mr. Catala contacting him to further distort and corrupt the narrative concerning the EJ Community’s legitimate concerns with the Morley Field Conversion. What is also particularly odd about Mayor Grebien’s 10/15/24 NAACP Letter is that it is in sharp contrast to the letter the former President of Providence NAACP – James Vincent – sent to Mayor Grebien on November 25, 2022 (“11/25/22 NAACP Letter”). In the 11/25/22 NAACP Letter, President Vincent writes:

“November 25, 2022

The Hon. Donald R. Grebien
Pawtucket City Hall
137 Roosevelt Avenue
Pawtucket, RI 02860

Re: Morley Field

Dear Mayor Grebien:

I write today to share my concerns regarding the City sale of Morley Field to private developers for the construction of a distribution warehouse facility. I am concerned that this transaction will take away a significant portion of this important community space from the residents of Pawtucket’s Woodlawn neighborhood, exacerbating health inequities including obesity, asthma, and other respiratory conditions that disproportionately impact low income African American and Latino populations.

Public parks are critical oasis of green, open space, particularly in dense urban settings like the Woodlawn area of Pawtucket. They provide safe areas for walking, community gatherings, and athletics. I understand that Morley Field has been used for all of these purposes for years. Indeed, I have heard from many residents about Morley Field.



For a thriving New England

CLF Rhode Island 235 Promenade Street
Suite 560, Mailbox 28
Providence, RI 02908
P: 401.351.1102
F: 401.351.1130
www.clf.org

These recreational and athletic activities are so essential in urban environments where green space is limited, and where our youth and adults often lack access to spaces where they can stretch out, connect with nature, and run around like kids playing football and other youth sports.

According to the Asthma and Allergy Foundation of America (AAFA), black and Hispanic people, as well as Native Americans, are at higher risk of developing asthma. They have more severe asthma symptoms, miss more days of work and school due to asthma, require more trips to the emergency room for asthma, and are more likely to die from asthma than white Americans.

Public recreational spaces like Morley Field are needed to help combat these troubling health disparities.

I applaud the City's desire to create new jobs, however, taking away Morley Field to do so would be inequitable. I understand that the City has plans to mitigate the loss of Morley Field by adding new green space along the Seekonk River in the City's Oak Hill neighborhood. While this is to be applauded, I am concerned that this new park location is more than a mile away from Morley Field. I fear that the residents of Woodlawn will be unable to access this new green space area.

In conclusion Mayor, I am asking for a meeting to discuss these concerns and to develop an equitable path forward that preserves green and recreational space in Pawtucket's Woodlawn neighborhood.

Sincerely:

James Vincent, President, NAACP Providence Branch"

Unfortunately, the City's conversion application doesn't mention the concerns raised by Mr. Vincent and the Providence NAACP in 2022 and CLF has not been able to uncover any information indicating, or otherwise confirming from members of the EJ Community, whether Mayor Grebien honored Mr. Vincent's request for a meeting.



For a thriving New England

CLF Rhode Island 235 Promenade Street
Suite 560, Mailbox 28
Providence, RI 02908
P: 401.351.1102
F: 401.351.1130
www.clf.org

These are not the only incidents of Mayor Grebien obfuscating the facts to unlawfully deprive the EJ Community of Morley Field. In January 2024, at the assistance of RIDEM, Pawtucket posted its draft Morley Field conversion application on the City website and mentioned in the posting that it was seeking public comments on the application. The deadline for providing public comments was set at February 2, 2024. The City received 184 public comments.⁶

As stated by Pawtucket Business Development Corporation Consultant Michael Cassidy, “[A]ll of [the comments] expressed the opinion that Morley Field should remain as an athletic field. . . . The City is not going to respond directly to any of the comments”.⁷ In fact, the City only released three of the comments, with the name on one of the three redacted.⁸ Public comments submitted by CLF were one of the 181 public comments the City did not release. Although CLF’s public comments were submitted directly to NPS under separate cover,⁹ CLF is not aware if NPS received any of the other 183 public comments against the conversion of Morley Field, and the City of Pawtucket has never once indicated that these concerns have been taken into consideration, a crucial component of meaningful involvement for EJ communities.

The City of Pawtucket’s intentional omission of material facts from, and intentional misstatement of material facts in, its Morley Field conversion application is a shocking indictment of Mayor Grebien’s violations of public trust and willful disregard of the EJ Community. Should NPS continue to recommend that the City of Pawtucket complete the community engagement process, NPS will be complicit in the City’s violation of public trust and disregard of the EJ Community’s interests. Moreover, any actions taken by NPS to approve the conversion of Morley Field shall be considered arbitrary and capricious.

CLF appreciates NPS’s attention to this matter and looks forward to continuing to engage with NPS as NPS works through its decision-making process. Please reach out if you have any questions regarding this letter or our previous correspondence.

⁶ *Grebien Administration and RIDEM slow to respond to environmental justice concerns - Residents opposed to paving a greenspace in an environmental justice community feel sidelined and stonewalled.* Steve Ahlquist, March 7, 2024; https://steveahlquist.substack.com/p/grebien-administration-and-ridem?r=4l5bq&utm_campaign=post&utm_medium=web&triedRedirect=true

⁷ Id.

⁸ Id.

⁹ February 2, 2024 CLF Public Comment Letter to the City of Pawtucket, a copy of which is attached hereto and incorporated herein by reference.



For a thriving New England

CLF Rhode Island 235 Promenade Street
Suite 560, Mailbox 28
Providence, RI 02908
P: 401.351.1102
F: 401.351.1130
www.clf.org

Sincerely yours,

A handwritten signature in black ink, appearing to read "R. Stang", is written over a light gray horizontal line.

Richard Stang, Senior Attorney
Conservation Law Foundation – Providence, RI

cc: Leon Russel: Chairman of the NAACP National Board of Directors
Attn. Derrick Johnson: President and CEO of the National NAACP
Abre' Conor: Director National NAACP Center for Environmental and Climate Justice
Tanisha Sullivan: President of New England Area Conference of NAACP Branches
Gerald Catala, President of Providence NAACP
Bob Ratcliffe, Division Chief, Conservation and Outdoor Recreation Division Office,
National Park Service
Stephan Nofield, NPS National Lead; Rivers, Trails, and Conservation Assistance
Lauren S. Imgrund, Assoc. Dir. Partnerships and Civic Engagement, NPS
Samual Roberts, Land and Water Conservation Fund, NPS – Interior Region 2
Gay Vietzke, Director, Region 1, US National Park Service
Terry Gray, Director, RI Dept. of Environmental Management
Mary Kay, Chief Legal Counsel, RI Dept. of Environmental Management
The Honorable United States Senator Jack Reed
The Honorable United States Senator Sheldon Whitehouse
The Honorable United States Representative Gabe Amo
The Honorable United States Senator Meghan Kallman
The Honorable State Representative Cherie Cruz
The Honorable State Representative Jennifer Stewart
The Honorable Mayor Donald Grebien, City of Pawtucket
Members of the Pawtucket City Council
Bianca Policastro, Director of Planning, City of Pawtucket
Alison Hoffman Carney, Chief, Environmental and Energy Unit, RI Attorney General
Darrell Brown, VP of Conservation Law Foundation Rhode Island
Britteny Jenkins, VP for Environmental Justice, Conservation Law Foundation