



STATE OF RHODE ISLAND

HISTORICAL PRESERVATION & HERITAGE COMMISSION

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Via email: [joseph.martella@dem.ri.gov](mailto:joseph.martella@dem.ri.gov)

Joseph T. Martella II  
Environmental Engineer III  
Rhode Island Department of Environmental Management  
Office of Land Revitalization & Sustainable Materials Management  
235 Promenade Street  
Providence, Rhode Island 02908

Re: RIHPHC Project No. 19383  
Metacomet Redevelopment Arsenic Remediation  
500 Veterans Memorial Parkway  
East Providence, Rhode Island

Dear Mr. Martella:

The Rhode Island Historical Preservation and Heritage Commission (RIHPHC) staff has reviewed the information that you provided for the above-referenced project. Marshall Properties LLC is proposing to conduct soil remediation activities on the former Metacomet Country Club property at 500 Veterans Memorial Parkway in East Providence, Rhode Island. The project has as its goal the remediation of elevated levels of arsenic at three specific locations on the property.

The Metacomet Country Club property has been the subject of ongoing archaeological investigations conducted by the Public Archaeology Laboratory, Inc. (PAL) since July 2024. As a result of this work within the development area, the Veterans Memorial Parkway Site and the Metacomet Site have been determined by the RIHPHC to be eligible for listing in the National Register of Historic Places, and the Lyon Avenue Site Loci 1 and 2 have been determined by the RIHPHC to be potentially eligible for listing.

In January 2025, as part of environmental due diligence, arsenic concentrations exceeding the Rhode Island Department of Environmental Management (RIDEM) Method 1 Direct Exposure Criteria were identified at the project site. Subsequent SAGE Environmental, Inc. (SAGE) correspondence with the RIDEM included a *Release Notification (Re-Submittal)* dated June 6, 2025. In response, the RIDEM issued a letter dated June 18, 2025, requiring that the property owner submit a Site Investigation Report (SIR). SAGE issued the *Site Investigation Report – Metacomet Redevelopment 500 Veterans Memorial Parkway Portion of Assessor’s Map 107, Plat 15, Lot 1, East Providence, Rhode Island* in September 2025. In the SIR, the three locations of arsenic exceedances are designated as C7, E1, and K14 (sometimes also referred to in project documents as SE-C7, SE-E1, and SE-K14, respectively).

As part of the Phase I archeological survey conducted by PAL in June 2024, locations C7 and E1 were determined to be outside the limits of the significant archaeological sites. Location K14 is

located within the archaeological site designated as Metacomet Site Locus 1, however, this specific location was not examined during the Phase I archaeological testing. On November 10, 2025, PAL scraped location K14 according to the established archaeology scope of work for the site and found no cultural features<sup>1</sup>.

The SIR proposes three alternatives to remediate the arsenic impacted soils at the three locations identified above as C7, E1, and K14. Alternative 1 is the “No Action” alternative. Alternative 2 consists of soil excavation, off-site disposal, and importation of clean fill material, also known as the “Dig & Haul” alternative. Alternative 3 consists of blending arsenic impacted soils with clean soil, then returning the blended soil to the excavation zone; this is also known as the “blending” alternative. SAGE has identified Alternative 3 (“blending”) as the preferred alternative.

The RIHPHC understands that Alternative 3 will proceed in accordance with the archaeological scope of work that is already in effect for the overall project site. It is our conclusion that the proposed remediation activity will have no adverse effect on cultural resources. We recommend that the Narragansett Indian Tribal Historic Preservation Office be afforded the opportunity to be present during these activities if they so desire.

These comments are provided in accordance with the Rhode Island Historic Preservation Act and Rhode Island General Laws. If you have any questions, please contact me or RIHPHC Principal Archaeologist Charlotte Taylor at [charlotte.taylor@preservation.ri.gov](mailto:charlotte.taylor@preservation.ri.gov).

Sincerely,



Jeffrey D. Emidy  
Executive Director  
State Historic Preservation Officer

C (all by email):      John Brown, Narragansett Indian Tribal Historic Preservation Officer  
                                 Paul Pisano  
                                 John Marshall  
                                 Lianne Marshall  
                                 Rick Mandile, SAGE Environmental, Inc.  
                                 Deborah Cox, PAL, Inc.  
                                 Cora Peirce, Narragansett Indian Tribal Historic Preservation Office  
                                 Mark Andrews, Narragansett Indian Tribal Historic Preservation Office

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<sup>1</sup> Email from Deborah Cox (PAL) to Jeffrey Emidy and Charlotte Taylor (RIHPHC), November 10, 2025  
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