Consideration of Brownfields and Contaminated Properties During FTA’s Environmental Review Process
USDOT Policy Encourages Transportation-Related Redevelopment of Brownfields

economic and infill development of the community - revitalization

transient use of brownfield for a transit purpose minimizes human exposure
Brownfields Are

abandoned, idled, or under-used industrial and commercial land, usually in urbanized areas, where development expansion or redevelopment is complicated by real or perceived contamination not hazardous enough to be on EPA’s National Priority List and are not eligible for Superfund-assisted remediation
Brownfield Redevelopment Concerns?

liability

prior uses are not often apparent

contamination from an off-site sources often not discovered unless digging/testing conducted

cleanup costs
Potential Brownfields Include

- existing railroad corridors
- former industrial areas
- urban renewal/redevelopment areas
- gas stations
- dry cleaners
- road right-of-way
Sources of Contamination Include

- on-site deposits in soil (railyards, etc)
- contaminated groundwater from off-site source
- leaking USTs and ASTs
- buildings to be demolished (asbestos/lead paint)
- naturally occurring (acidic groundwater, asbestos rock)
Purpose of Environmental Site Assessment (ESAs)

determine remediation needs and costs

assess liabilities and financial responsibilities in consultation with responsible State agency and EPA, if involved

assess community impacts

assess environmental impacts

assess construction and operating impacts
Environmental Site Assessments

Phase I ESA Identifies possible contamination

Phase II ESA determines extent of contamination

ASTM standards (www.astm.org)
required under National Environmental Policy Act (NEPA)

goal to balance the transit benefits, costs, and impacts in choosing an optimal project site

identify environmental and community impacts

inform the public
Forms of Environmental Review

Environmental Impact Statement (EIS)

Environmental Assessment (EA)

Categorical Exclusion (CE or CatEx)
What Triggers Environmental Review?

money FTA provides financial support (Grants) for maintenance and enhancement of public transit systems

Why ESAs?

location FTA–supported projects are often located in commercial or industrial areas contaminated by past uses, brownfields
Identifying Contaminated Sites During Environmental Review

- Identify potentially contaminated properties, brownfields
- Identify known contaminated properties
- Identify potential property acquisitions
Phase I ESA for properties to be acquired for all alternatives (Follow ASTM without right-of-entry)

complete Phase I ESA for property to be acquired for the preferred alternative

Phase II ESA if Phase I ESA indicates its need
Include mitigation for construction and operation activities:

- remediation and clean-up plans
- plans to control and contain contamination
QUESTIONS?