

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

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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)



Environmental Review Process

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



ESA During Environmental

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



ESA During Environmental

Include mitigation for construction and operation activities:

- remediation and clean-up plans

- plans to control and contain contamination



QUESTIONS?

FTA

FEDERAL TRANSIT ADMINISTRATION

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