



**NORTHEAST ENGINEERS  
& CONSULTANTS, INC.**

"A Knowledge Corporation"®  
6 VALLEY ROAD MIDDLETOWN RHODE ISLAND 02842 401.849.0810 PHONE 401.846.4169 FAX

February 23, 2022

RICRMC

Oliver H. Stedman Government Center  
4808 Tower Hill Road, Suite 3  
Wakefield RI 02879-1900



RE: Noble Development, LLC  
CRMC Assent Application #2021-06-0974  
East Providence Map 203 Block 1 Lot 4, Map 303 Block 13 Lots 4 &5

The following responses are in reference to the comments received from your office via email on December 21, 2021. The attached revised and additional submission materials reflect the content of these responses.

*CRMC Comment #1) Please provide construction methodology of removing the Barge. In particular, provide method of debris and turbidity control. A pre and post construction should be performed and be part of the sequence of removal. This removal work shall be done prior to construction of the upland development. Please coordinate with the ACOE and Coast Guard for their review/input.*

**NE&C Response #1) A memorandum outlining the barge removal process has been prepared. This memorandum can be found as Appendix L of the revised CRMC Narrative.**

*CRMC Comment #2) Please provide sizing for all the proposed culverts that will be used for stormwater conveyance.*

**NE&C Response #2) All proposed stormwater conveyance piping has been modeled appropriately in the HydroCAD report included in the stormwater narrative. All piping has been designed to provide sufficient capacity for a 25-year storm at a minimum. There is no need for a secondary set of culvert calculations outside of the model.**

*CRMC Comment #3) As noted in CRMC PD 2021-01-027, due to environmental contamination and former industrial uses, please provide authorization from RI Department of Environmental Management's, Office of Land Revitalization and Sustainable Material Management. This authorization is considered perquisite approvals to CRMC approval.*

**NE&C Response #3) Following the completion of remedial efforts, on May 22, 2006, the Site was issued an Interim Letter of Compliance by the RIDEM OLRSM. A copy of this letter is included in Appendix M of the revised CRMC Narrative. Current redevelopment plans indicate the three (3) portions of the property with recorded Environmental Land Use Restrictions (ELURs) will not be disturbed other than improving the existing cap with pavement, pavers and/or grassed vegetation. Copies of the ELUR Declarations are located in Appendix G of the revised CRMC Narrative. Following completion of redevelopment activities, groundwater monitoring wells will be placed throughout the property and long-term groundwater monitoring will initiate. Groundwater monitoring will occur on a quarterly basis until compliant with applicable RIDEM Remediation Regulations. An OLRSM Letter of**

Compliance regarding the installation and monitoring of these wells has also been included in Appendix M, if available at time of resubmission.

CRMC Comment #4) Please address the Natural Heritage Area.

NE&C Response #4) The RIDEM GIS Mapping was reviewed and it was noted that much of the Coastal Side and the southwest corner of the Pond Side are located within a Natural Heritage Area which incorporates the Seekonk River and extends across to the Providence side. This area is noted as "Heritage Area 74" in the RI Natural Heritage Data. The project team reached out to RINHS and RIDEM offices for additional information. RIDEM provided the following statement while referencing the image below.

*"Wild Lupine (Lupinus perennis), a species of state concern, last observed in 2009 is south of the steel mill site as indicated by the green dot on the map below. Across the river, the purple dot represents a 1990 observation for Late or Autumn Coral-root (Corallorhiza odontorhiza), a state threatened species."*

As neither of these locations are located on the subject property, it is not anticipated that either of these species will be encountered within the work area. The project team will provide CRMC with any additional information regarding these plant species should it become available from RIDEM or RINHS.



Fig 1. Additional graphical data provided by RIDEM regarding species of concern

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*CRMC Comment #5) Native/sustainable plantings/habitat management is required within the 50' greenway and a proposed UCG Buffer Management Plan shall be submitted further documenting proposed landscaping. Trees shall be included within any management plan.*

**NE&C Response #5) An UCG Buffer Management Plan is included as Appendix H of the revised CRMC Narrative.**

*CRMC Comment #6) Please clarify proposed work around the A-13 flag, in particular proposed impacts to the shoreline from the proposed dock, as this area was also questioned in the previous PD relative to FWW impacts.*

**NE&C Response #6) The work proposed in the vicinity of the A-13 flag, specifically the entirety of the canoe/kayak launch and associated waterfront access, was designed by others for the City of East Providence and approved by RIDEM under application No. 18-0122. The improvements were added to the design plans at the request of the city for completeness. It is intended that the work proposed in this area should be completed per the permitted design plans by others with any and all stipulations of the original permit. NE&C will provide CRMC with copies of the approved permit plans. A copy of the insignificant alteration permit has been included in Appendix O of the revised CRMC Narrative. NE&C has revised the East Point permit plans to better indicate that the work proposed in this vicinity should be performed in accordance with the design plans by others.**

*CRMC Comment #7) Details for the proposed dock, including benthic habitat and construction methodology are required.*

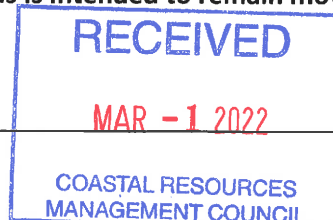
**NE&C Response #7) Please refer to previous response.**

*CRMC Comment #8) Please provide documentation for compensation for reduced greenway width (100' to 50') as required by the Metro Bay SAMP (i.e., public access, additional habitat/buffer, restored areas, etc.) and noted in the previous PD. Monetary compensation shall not be allowed.*

**NE&C Response #8) NE&C has prepared a list of amenities and public improvements within the UCG beyond that which are typically required to meet UCG standards. This list is located in Appendix P of the revised CRMC Narrative.**

*CRMC Comment #9) Paths should be 8' in width for public access under the SAMP, some areas note 5', please document the need for such variance as well as compatibility with ADA requirements.*

**NE&C Response #9) The applicant will provide ADA complaint access paths from the interior sidewalks to several promenades/overlooks and seating areas along the UCG. Accessible walking paths between Promenade Overlook areas 1 and 2 (at the northwest corner of the Coastal Side of the Site will be 5' wide in compliance with ADA requirements; however, the required grading and retaining edges in this area do not allow for a full 8' wide clear access. All other accessible walkways will be 5' in width, but will provide an 8' cleared access (at-grade lawn or similar) where possible. All mowed paths noted vary in width from 5-8 ft or more to provide a more natural aesthetic approach and dynamic vistas along the UCG. The surface between ADA accessible seating areas is intended to remain mowed grass.**





*CRMC Comment #10) Relief from the required construction setback is noted, please submit corresponding variance criteria.*

**NE&C Response #10) NE&C has address the six criteria listed in Section 1.1.7 of the CRMP (650-RICR-20.00.1) in writing. This memorandum is located in Appendix K of the revised CRMC Narrative.**

*CRMC Comment #11) Additional sapling/tree plantings are required in the landscaping plan; a diversity of habitat should be employed. Specifically, the Omega Pond area requires more than existing vegetation line, the previous PD specifically notes allowing Greenway in this 'area of land within 50' provided native vegetation is retained and restored with habitat quality being a key consideration in this area. An expanded narrative and accompanying landscape plan are required, including areas for invasive management/methodology and an IM contract.*

**NE&C Response #11) Existing vegetation is to be retained to the greatest extent practical, while also providing the needed stormwater control and accessibility needs for the UCG, particularly along Omega Pond. To supplement this vegetation, a mixture of supplemental evergreen and deciduous native trees and shrubs are being proposed along the edges of the Pond and portions of the Seekonk River. The project landscape architect is assessing the need for additional supplemental vegetation in areas near the proposed boat launch and Overlook 5 on Omega Pond. Additional narrative and landscape plan revisions, including additional specifications on invasive management/methodology have been prepared and included with this response. These include the requirements of Certified Invasive Manager Oversight in compliance with the Program's guidance on buffer zone management.**

*CRMC Comment #12) Work on the existing osprey pole shall be coordinated directly with the DEM's Division of Fish and Wildlife as no disruption to the nest site shall occur during the active season (~March 15-August15) and/or a time of year restriction applied in any Assent.*

**NE&C Response #12) NE&C has added notation to this effect to the permit plans.**

*CRMC Comment #13) As discussed with the project attorney, please provide appropriate UCG easement/restriction documents for proposed greenway, public use areas, and public parking areas. Appropriate signage shall be included within these documents/exhibits per the SAMP.*

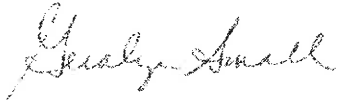
**NE&C Response #13) Draft documentation has been prepared for CRMC review. These documents can be found in Appendix J of the revised CRMC Narrative. The project landscape architect has prepared a signage plan which has been included in this response.**

*CRMC Comment #14) Written response to RIHPHC comments shall be submitted, documenting compliance with requested revisions, as applicable.*

**NE&C Response #14) A letter of "no-objection" from RIHPHC has been included in Appendix O of the revised CRMC Narrative.**

Should you have any further questions or concerns regarding this application, please contact our offices. Thank you.

Best regards,  
NORTHEAST ENGINEERS & CONSULTANTS, INC.



Lyn Small, PE  
Vice President







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& CONSULTANTS, INC.**

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January 11, 2022

RICRMC

Oliver H. Stedman Government Center  
4808 Tower Hill Road, Suite 3  
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RE: Noble Development, LLC  
CRMC Assent Application #2021-06-0974  
East Providence Map 203 Block 1 Lot 4, Map 303 Block 13 Lots 4 &5

The following preliminary responses are in reference to the comments received from your office via email on December 21, 2021. It is requested that these responses be reviewed CRMC staff and any concerns regarding the described method of approach and any requests for additional clarification be addressed before any formal resubmission of materials be made.

*CRMC Comment #1) Please provide construction methodology of removing the Barge. In particular, provide method of debris and turbidity control. A pre and post construction should be performed and be part of the sequence of removal. This removal work shall be done prior to construction of the upland development. Please coordinate with the ACOE and Coast Guard for their review/input.*

**NE&C Response #1) NE&C will develop a construction sequence and provide notes pertaining to turbidity control. NE&C also requests that CRMC provide clarification to the statement "a pre and post construction should be performed". Is this a request for a pre and post construction survey?**

*CRMC Comment #2) Please provide sizing for all the proposed culverts that will be used for stormwater conveyance.*

**NE&C Response #2) All proposed stormwater conveyance piping has been modeled appropriately in the HydroCAD report included in the stormwater narrative. All piping has been designed to provide sufficient capacity for a 25-year storm at a minimum. There is no need for a secondary set of culvert calculations outside of the model.**

*CRMC Comment #3) As noted in CRMC PD 2021-01-027, due to environmental contamination and former industrial uses, please provide authorization from RI Department of Environmental Management's, Office of Land Revitalization and Sustainable Material Management. This authorization is considered perquisite approvals to CRMC approval.*

**NE&C Response #3) SAGE will coordinate with RIDEM OLRSM for the required authorization. NE&C to provide SAGE with the latest revised design plans which have replaced the majority of stormwater infiltration devices with lined and under-drained devices, as the prior infiltration devices would have been potentially contentious to the OLRSM.**

*CRMC Comment #4) Please address the Natural Heritage Area.*

**NE&C Response #4) The RIDEM GIS Mapping was reviewed and it was noted that much of the Coastal Side and the southwest corner of the Pond Side are located within a Natural Heritage Area which incorporates the Seekonk River and extends across to the Providence side. This area is noted as "Heritage Area 74" in the RI Natural Heritage Data; however, our project team has found little to no existing native vegetation existing within the majority of the site and it is unclear as to what on-site observations may have led to this property being included in the Natural Heritage Area. The project team will reach out to appropriate RINHS and RIDEM offices to request further information and will provide CRMC further documentation as to how to address this comment.**

*CRMC Comment #5) Native/sustainable plantings/habitat management is required within the 50' greenway and a proposed UCG Buffer Management Plan shall be submitted further documenting proposed landscaping. Trees shall be included within any management plan.*

**NE&C Response #5) The project team is currently developing and will provide a Native/Sustainable Plantings and Habitat Management Plan. This Plan will include direction for the proposed management of trees and shrubs within the UCG.**

*CRMC Comment #6) Please clarify proposed work around the A-13 flag, in particular proposed impacts to the shoreline from the proposed dock, as this area was also questioned in the previous PD relative to FWW impacts.*

**NE&C Response #6) The work proposed in the vicinity of the A-13 flag, specifically the entirety of the canoe/kayak launch and associated waterfront access, was designed by others for the City of East Providence and approved by RIDEM under application No. 18-0122. The improvements were added to the design plans at the request of the city for completeness. It is intended that the work proposed in this area should be completed per the permitted design plans by others with any and all stipulations of the original permit. NE&C will provide CRMC with copies of the approved permit plans, as well as a copy of the insignificant alteration permit. NE&C will also revise the East Point permit plans to better indicate that the work proposed in this vicinity should be performed in accordance with the design plans by others.**



*CRMC Comment #7) Details for the proposed dock, including benthic habitat and construction methodology are required.*

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*CRMC Comment #8) Please provide documentation for compensation for reduced greenway width (100' to 50') as required by the Metro Bay SAMP (i.e., public access, additional habitat/buffer, restored areas, etc.) and noted in the previous PD. Monetary compensation shall not be allowed.*

**NE&C Response #8) NE&C will prepare a list of amenities and public improvements within the UCG beyond that which typically required to meet UCG standards. These improvements shall include, but are not limited to:**

- **Five (5) Primary Accessible Pervious Paver Promenade Overlook Areas**
- **Three (3) Secondary Accessible Overlook Areas**
- **Multiple Resilient Granite Benches Set at Regular intervals along the entirety of the UCG**
- **Accessible Canoe/Kayak Launch**
- **Up to five (5) Interpretive Signage Panels providing educational content for UCG users**
- **Future Focal Point Sculpture Locations (up to five (5) sculpture locations have been identified)**
- **A centralized open park space at the project interior with Accessible Access Walkways to the UCG and River Overlook, including new patio, seating, and open passive recreational multi-use lawn area.**
- **New Sculptural Bike Racks at Public Access Parking Areas**

*CRMC Comment #9) Paths should be 8' in width for public access under the SAMP, some areas note 5', please document the need for such variance as well as compatibility with ADA requirements.*

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**NE&C Response #10) NE&C will address the six criteria listed in Section 1.1.7 of the CRMP (650-RICR-20.00.1) in writing and submit to CRMC as requested.**

*CRMC Comment #11) Additional sapling/tree plantings are required in the landscaping plan; a diversity of habitat should be employed. Specifically, the Omega Pond area requires more than existing vegetation line, the previous PD specifically notes allowing Greenway in this 'area of land within 50' provided native vegetation is retained and restored with habitat quality being a key consideration in this area. An expanded narrative and accompanying landscape plan are required, including areas for invasive management/methodology and an IM contract.*

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*CRMC Comment #13) As discussed with the project attorney, please provide appropriate UCG easement/restriction documents for proposed greenway, public use areas, and public parking areas. Appropriate signage shall be included within these documents/exhibits per the SAMP.*

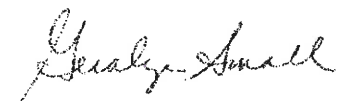
**NE&C Response #13) Project counsel and engineer shall develop and submit draft documentation for the easement and use restrictions for the UCG, public access areas, and public parking areas. The project landscape architect shall develop proposed signage locations as well as the content of the signage for CRMC review.**

*CRMC Comment #14) Written response to RIHPHC comments shall be submitted, documenting compliance with requested revisions, as applicable.*

**NE&C Response #14) Project counsel shall address RIHPHC concerns and any resulting compliance documentation or permitting plan revisions shall be shared with CRMC.**

Should you have any questions or concerns regarding this application, please contact our offices. Thank you.

Best regards,  
NORTHEAST ENGINEERS & CONSULTANTS, INC.



Lyn Small, PE  
Vice President