

**KEOUGH + SWEENEY, LTD.**

ATTORNEYS AND COUNSELORS AT LAW  
41 MENDON AVENUE  
PAWTUCKET, RHODE ISLAND 02861  
**TELEPHONE** (401) 724-3600  
**FACSIMILE** (401) 724-9909  
www.keoughsweeney.com

RAYNHAM OFFICE:  
90 NEW STATE HIGHWAY  
RAYNHAM, MA 02109  
TEL. (508) 822-2813

**JOSEPH A. KEOUGH JR.\***  
**JEROME V. SWEENEY III\***

**SEAN P. KEOUGH\***

**JEROME V. SWEENEY II**  
**OF COUNSEL**

\*ADMITTED TO PRACTICE IN  
RHODE ISLAND & MASSACHUSETTS

BOSTON OFFICE:  
171 MILK STREET  
SUITE 28  
BOSTON, MA 02109  
TEL. (617) 574-0054  
FAX (617) 451-1914

April 16, 2021

*Via Email Only*

Christian F. Capizzo, Esquire  
Counsel  
Partridge Snow & Hahn LLP  
40 Westminster St, Suite 1100  
Providence, RI 02903

**Re: *Bristol County Water Authority – Kickemuit Dams***

Dear Attorney Capizzo:

As you know, I represent the Bristol County Water Authority (“BCWA”). As referenced in my March 5, 2021 letter, your February 25, 2021 letter to Stephen Coutu, the BCWA’s Executive Director, raised a number of specific issues regarding the BCWA’s potential removal of the Upper and Lower Kickemuit Dams in Warren, Rhode Island (the “Project”). The BCWA has reviewed these issues and sets forth its responses herein below.

**I. Issues Numbered 1-7**

1. “Negative impact to the property rights and interests of the Parties including but not limited to inundation of the salt marsh and acceleration of tidal erosion on both public and private properties leading to potential inverse condemnation claims, destroying harvestable land that supports the current activities on the farm, reducing overall annual agricultural yield and income, and the elimination of municipal tax credits due to the Parties no longer being able to each maintain farm status.”

**BCWA Response:** The flood studies prepared by Pare Corporation (“Pare”) have found minimal change to the flood surface elevations under all scenarios modelled to date from sunny day to ½ probable maximum flood under a variety of tidal conditions. As an added measure, the BCWA is proposing to install flap gates on the culverts along Serpentine Road. In addition, it is my understanding that the Rhode Island Department of Environmental Management (“RIDEM”) does not believe removing the dams will disqualify property from



the Farm and Forest Open Space Program.

2. “Negative impact to the public safety and health due to the lack of the water main lines servicing the Parties, the Town of Warren and surrounding communities including service for potable water and fire suppression. In addition, the saltwater inundation and associated hydraulic pressure may contaminate private wells of the residents of Warren.”

**BCWA Response:** The BCWA disagrees with your position for several reasons. First, the BCWA does not believe public health and safety in the “Town of Warren and surrounding communities” will be negatively impacted as it relates to “potable water.” The water impounded within the Lower Kickemuit Reservoir is no longer consider a public water supply, and the BCWA has not used the reservoir as a portable water source since approximately 2011. Second, you are correct there is no water main on Serpentine Road. The abutters to the reservoir have always obtained their water supplies from private wells located at varying distances from the reservoir and at varying depths. Removing the dams will not change this circumstance. The BCWA has agreed to monitor the wells before removing the dams and will work with the abutters to address changes if they occur. In addition, the BCWA has agreed to work with the Town of Warren if it has any fire suppression concerns related to changes in the lower impoundment’s salinity from brackish to saltwater.

3. “Negative impacts related to the potential FEMA’s redesignation of flood hazard areas and resulting increase of flood insurance rates. The redesignation will result in the Parties properties, currently not in a flood zone, to be redesignated in a Special Flood Hazard area, requiring flood insurance. The dam removal may prompt new FEMA analysis that will impact other private and public property owners in Warren.”

**BCWA Response:** As the FEMA 100 year flood plain inundation in the area of the Kickemuit Reservoirs is not expected to change, changes to the FEMA flood insurance maps are not anticipated either. The Kickemuit River is currently mapped as a Zone AE with an elevation of 12 feet at Schoolhouse Road, which extends across Serpentine Road to the residences along the west side. The lower dam is not mapped as a dam on the FEMA flood map and does not provide a flood barrier. The upper dam is identified on the FEMA flood map, north of Schoolhouse Road, but the map does not indicate that the dam provides flood protection as there is no change in the flood elevation from upstream to downstream of the dam. Below Child Street, the mapped Zone AE has an elevation of 14 feet, indicating that Child Street is the hydraulic barrier which acts to lower flood elevation. The current FEMA mapping *does not* indicate that the area is an “Area with Reduced Risk Due to Levee” (See, FEMAS National Flood Hazard layer (NFHL) Viewer). This means the presence of the dams does not reduce the level of flooding within this portion of the Kickemuit River.

4. “Negative impacts to public safety with impediments to emergency response, emergency evacuation routes and first responder equipment. Specifically, the Fire Department utilizes fresh water from the reservoir to supply pumps for fire suppression since there is no water main. With the removal of the dams and inundation of salt water from the Bays into the reservoir, fire suppression equipment will degrade more quickly negatively impacting



performance and operational readiness in emergency situations. In addition, this inundation of water will impede emergency evacuation routes along Serpentine Road, which is at the lowest grade to the water level.”

**BCWA Response:** As set forth above, the BCWA has agreed to work with the Town of Warren to address fire suppression concerns relative to changes in the lower impoundment’s salinity from brackish to saltwater. The lower impoundment has already converted to a brackish system due to tidal inundation. In the summer and fall of 2020, BCWA staff monitored three sites on the Kickemuit River, the upper impoundment, the lower impoundment and the estuary at the Child Street bridge through the University of Rhode Island (“URI”) Watershed Watch program. According to URI’s water quality monitoring report, the lower Kickemuit River impoundment had quite high chloride and salinity levels, well within brackish water classified concentrations.

The modeled inundation mapping shows minimal change in flood surface elevations which is not anticipated to impact the ability of emergency vehicles to access the properties along Serpentine Road. Furthermore, the BCWA does not anticipate any negative impacts to evacuation routes. For those properties along the northern half of Serpentine Road, the expected evacuation routes would be to the north and west, and for those properties nearing the Child Street end of Serpentine Road, the evacuation routes would be to the south and west, and those routes will not be adversely impacted. The BCWA has taken steps to mitigate flooding impacts to Schoolhouse Road, which also serves as an evacuation route. In particular, the BCWA coordinated with the Town of Warren and the Rhode Island Department of Transportation to construct improvements to reduce flooding along that evacuation route, which include raising the elevation of Schoolhouse Road and resizing its culverts.

5. “Negative impacts to commercial and recreational shell fishing and fishing. The dams have provided a barrier to control pollution/contaminates to and from the Bays. Removal of the dams may result in the release pollution/contaminates into the Bays.”

**BCWA Response:** The water quality monitoring data collected by BCWA staff and analyzed by URI’s Watershed Watch program in the summer and fall of 2020 documented that the dams do not provide a barrier to control pollution under existing conditions. According to the URI Watershed Watch’s water quality report, total nutrients, phosphorus and nitrogen were high in the upper and lower impoundments as well as in the downstream Kickemuit estuary site at Child Street. Dissolved oxygen was at levels considered to be stressful and potentially lethal for aquatic life. All three sites recorded fecal coliform values above the criterion for the designated uses. The BCWA disagrees with your position and notes that removing the dams is supported by the Rhode Island Shellfisherman’s Association, the Atlantic Coastal Fish Habitat Partnership and Save The Bay along with other environmental and conservation groups.

6. “Negative impacts to historical and Wampanoag/Aquinnah ancient Indian burial grounds including but not limited to the Kickemuit Cemetery (the 3rd oldest in RI & oldest in



Warren) on the banks of the Kickemuit river containing over 400 burial plots including veterans of the King Philip War (1675-76) and Rhode Island's last colonial Governor Josiah Lyndon (1768- 69). It is my understanding that on January 12, 2021, the Commissioner of Indian Affairs for Bristol and Norfolk Counties notified the BCWA of its opposition to the dam removal proposal due to the impact on this historical and culturally sensitive land."

**BCWA Response:** The BCWA is not aware of any notification of opposition dated January 12, 2021 from the Commissioner of Indian Affairs for Bristol and Norfolk Counties (presumably in Massachusetts). The BCWA is aware the Wampanoag Tribe of Gay Head (Aquinnah) sent notice to the Town of Warren requesting "that any planning of dam removals in the Warren-Bristol area should include consultation with the Tribe to ensure their cultural concerns are taken into consideration in the planning stages." The BCWA will contact local tribes and historic commissions to solicit comments and concerns prior to submitting permit applications and during the permit review process. In addition, it should be noted that the cemetery located near the northern end of Serpentine Road was established prior to the construction of the dams based upon a natural and free flowing estuary.

7. "Negative impacts to freshwater habitat and wildlife."

**BCWA Response:** The BCWA fundamentally disagrees with your contention that removing the dams will negatively impact freshwater habitat and wildlife. Presently, the water quality of the upper and lower impoundment is degraded and considered either eutrophic or hypereutrophic according to URI's Watershed Watch water quality monitoring report. The water clarity is poor, and the oxygen levels are low resulting in stressful or potentially lethal conditions for aquatic life. Removing the dams will improve the water quality by eliminating the stagnant conditions and re-establishing a free flowing estuary capable of supporting a robust salt water habitat. I would again point out that the BCWA has received letters of support for the Project from several environmental and conservation groups including the RIDEM's Division of Fish and Wildlife. In addition, the Project partners are receiving technical assistance from NOAA's Restoration Center staff on the engineering plans.

## II. Miscellaneous Issues

- The "BCWA's proposal to remove the dams is solely to avoid the costs associated with restoring and remediating the dams after many years of neglect and failure to maintain them."

**BCWA Response:** The dams fall under the jurisdiction of the State of Rhode Island's dam safety program, and the current rules and regulations that resulted in the notice of violation referred to in your letter were adopted in 2007. Prior to this date, the regulations relative to dam safety were limited. Both the upper and lower dams have been generally maintained, and given their age, have exceeded the typically accepted service life of 50 years. Much of the requested work is due to changes in design standards and requirements since the structures were built.



Second, the BCWA's proposal to remove the dams is not solely to avoid costs associated with restoring and remediating the dams. In fact, given the objections raised by your clients and your allusions to "protracted and expensive litigation," the path of least resistance would be to simply repair and maintain the dams going forward. However, this course of action does not appear to be in the public interest. While the BCWA, as owner of the dams, is responsible for making the proposal to remove them, the BCWA is not alone in advocating for this Project as pointed out in this letter and my March 5, 2021 letter. Numerous environmental, conservation and government agencies support removing the dams.

- "Considering how tight PARE's forecasted flood thresholds appear on its mapping for best case scenarios, and also considering that flood modeling has certain percentages of margin of error, this is a major concern for the Parties and should be the focus of concern for the residents of Warren, the Warren Town Council and other stakeholders in the community."

**BCWA Response:** Pare's modeling performed to date utilizes robust modeling software developed by the Army Corps of Engineers Hydraulic Engineering Center that incorporates a two dimensional surface of the area developed from topographic and bathymetric survey supplemented with LiDAR data available through RIGIS. The models include a variety of storm and tidal events, in combination, from the baseflow (Sunny day) condition to a 1/2 probable maximum flood event (~20 in of rain/72 hours) with significant modeling of the 10 year and 100 year storm events. Thus, the BCWA disagrees the modeling should be a "focus of concern."

### **III. Robert Botelho's February 25, 2021 Requests**

In addition, your client, Robert Botelho, requested the following in an email sent to Mr. Coutu on February 25, 2021:

"...elevation model depictions, similar to one that was provided last week for the Water view Condos for 25, 39 & 43 Serpentine Rd (Lowest cross section of Serpentine Road). The points that we would like to visually see in elevation model (not data matrix) are:

A. Normal water level range cycle (Low, Mean, High, Moon, King) as it relates to culvert/inverts, top of road, property inundation.

B. Storm surge for 5, 20 and 100 year events across the tide level range cycle (Low, Mean, High, Moon/King) as it relates to culvert / inverts, top of road, private wells & property inundation.

C. Precipitation event + Storm surge for 5, 20 and 100 year events across the tide level range cycle (Low, Mean, High, Moon, King) as it relates to culvert / inverts, top of road, property inundation



D. Provide specifications on the proposed culvert check vales, specifically the hydraulic pressure release required to permit drainage and to what flowrate and the amount of back pressure (elevation pooling) that is needed.

**BCWA Response:** (A. – C.) Mr. Botelho requested “elevation model depictions” for 25, 39 & 43 Serpentine Road, “similar to one that was provided... for the Water view Condos.” Herein below are Pare’s compiled modeled elevations based upon the analyses completed to date for the culverts along Serpentine Road. Please note that Pare’s results have been modeled to include the 2, 10 and 100-year storms. The 2-year storm (El. 5.3) event was chosen as a very frequent storm event that would represent the typical fluctuation occurring within the system. The 10-year storm event (El. 6.8) was chosen as the associated surge starts to overtop the tide gate system supports (El. 6.5) at the dam and was expected to show the greatest incremental change between the existing and proposed conditions. Finally, the 100-year storm event was chosen at it is the storm utilized by FEMA. Pare’s storm/inflow hydrograph spans multiple tide cycles, so it is not presented at each event at the low, mean, high, 'moon' and 'king' as referenced in Mr. Botelho’s request, but rather in comparison to those events. The following figure and table present the results of the completed analysis with data for each of the culverts along Serpentine Road.



Location	Event Surge Elev Condition US/DS	El. 6.5 Surge only			2-yr Strm&Surge			10-yr Strm&Surge			100-yr Strm&Surge		
		6.5			5.3			6.8			11.5		
		EC	PC	Diff (ft)	EC	PC	Diff (ft)	EC	PC	Diff (ft)	EC	PC	Diff (ft)
N1 US Invert: 4.2 / TOR: 6.4	US	Dry	Dry	N/A	4.5	4.5	-0.01	5.2	5.6	0.45	11.5	10.6	-0.90
	DS	3.2	4.6	1.41	4.2	4.2	0.00	5.1	5.9	0.78	11.5	10.6	-0.90
N2 US Invert: 3.7 / TOR: 6.6	US	Dry	Dry	N/A	4.6	4.6	0.00	6.4	6.4	0.00	11.5	10.6	-0.90
	DS	3.2	4.6	1.42	4.2	4.2	0.00	5.1	5.9	0.78	11.5	10.6	-0.90
N3 US Invert: 6.6 / TOR: 8.7	US	Dry	Dry	N/A	7.6	7.6	0.00	8.5	8.5	0.00	11.5	10.7	-0.76
	DS	3.2	4.6	1.44	4.2	4.2	0.00	5.1	5.9	0.79	11.5	10.7	-0.76
N4 US Invert: 3.4 / TOR: 5.8	US	Dry	Dry	N/A	4.9	4.9	0.00	5.8	5.9	0.14	11.5	10.9	-0.60
	DS	3.2	4.6	1.44	4.2	4.2	0.00	5.1	5.9	0.78	11.5	10.9	-0.60
N5 US Invert: 3.9 / TOR: 6.0	US	Dry	Dry	N/A	4.7	4.7	0.00	5.1	5.2	0.09	11.5	10.9	-0.56
	DS	3.2	4.6	1.44	4.2	4.2	0.00	5.1	5.9	0.79	11.5	10.9	-0.56
N6 US Invert: 5.4 / TOR: 7.6	US	Dry	Dry	N/A	6.2	6.2	0.00	7.0	7.0	0.00	11.5	11.0	-0.54
	DS	3.2	4.6	1.44	4.2	4.2	0.01	5.1	5.9	0.78	11.5	11.0	-0.54
N7 US Invert: 5.9 / TOR: 8.3	US	Dry	Dry	N/A	6.3	6.3	0.00	6.7	6.7	0.00	11.5	11.0	-0.52
	DS	3.2	4.6	1.45	4.2	4.2	0.00	5.1	5.9	0.81	11.5	11.0	-0.52
N8 US Invert: 5.2 / TOR: 7.2	US	Dry	Dry	N/A	5.7	5.7	0.00	6.2	6.2	0.00	11.5	11.0	-0.51
	DS	3.2	4.6	1.46	4.2	4.2	0.00	5.1	5.9	0.82	11.5	11.0	-0.51
N9 US Invert: 7.1 / TOR: 7.7	US	Dry	Dry	N/A	7.3	7.3	0.00	7.6	7.6	0.00	11.5	11.0	-0.49
	DS	3.2	4.6	1.45	4.2	4.2	0.00	5.1	5.9	0.82	11.5	11.0	-0.49

EC: Existing Conditions    PC: Proposed Conditions    TOR: Top of Road (Serpentine Road)

MHHW (NOAA): Elevation 2.28 NAVD88  
 MLLW (NOAA): Elevation -2.44 NAVD88  
 King Tide (NOAA): Elevation 4.1 NAVD88

**El 6.5 Surge Only:** Represents a 4.2 ft storm surge above MHHW due to an offshore event that results in a surge, but no precipitation.

**2-year Storm and Surge:** Represents a 3 ft surge above MHHW and 3.4” precipitation event (NOAA Atlas 14).

**10-year Storm and Surge:** Represents a 4.5 ft surge above MHHW and 5.06” precipitation event (NOAA Atlas 14).

**100-year Storm and Surge:** Represents a 9.2 ft surge above MHHW and 7.69” precipitation event (NOAA Atlas 14).

D. The flap gates are still being selected for each application as some will need to be surface mounted and others will be clamped to the pipe. Pare can provide specifications when they are selected.



Christian F. Capizzo, Esquire  
April 16, 2021  
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Thank you for your attention to these matters. Please contact me with any questions.

Sincerely,



Joseph A. Keough, Jr.

cc: Ms. Janet Coit, Director, DEM - janet.coit@dem.ri.gov  
Mr. David Chopy, Chief of OC&I, DEM - david.chopy@dem.ri.gov  
Mr. Jeffrey Willis, Exec. Dir., CRMC - jwillis@crmc.ri.gov  
Ms. Kate Michaud, Manager, Town of Warren - kmichaud@townofwarren-ri.gov  
Ms. Keri Cronin, President, Warren Town Council - kcronin@townofwarren-ri.gov  
Atty. Anthony DeSisto, Solicitor, Town of Warren - adlawllc@gmail.com  
Atty. Tricia Jedele, Chief, Env. & Energy, RIAG - TJedele@riag.ri.gov  
Atty. Christy Hetherington, Chief Legal, DPUC - Christy.hetherington@dpuc.ri.gov  
Rep. Jason Knight (District 67) - rep-knight@rilegislature.gov  
Rep. June Speakman (District 68) - rep-speakman@rilegislature.gov  
Sen. Walter Felag (District 10) - sen-felag@rilegislature.gov  
Sen. James Seveney (District 11) - sen-Seveney@rilegislature.gov  
Rep. David Bennet, Chair, House Env. & Nat. Res. Committee - rep-bennett@rilegislature.gov





# KEOUGH + SWEENEY, LTD.

ATTORNEYS AND COUNSELORS AT LAW

41 MENDON AVENUE

PAWTUCKET, RHODE ISLAND 02861

TELEPHONE (401) 724-3600

FACSIMILE (401) 724-9909

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90 NEW STATE HIGHWAY  
RAYNHAM, MA 02109  
TEL. (508) 822-2813

BOSTON OFFICE:  
171 MILK STREET  
SUITE 28  
BOSTON, MA 02109  
TEL. (617) 574-0054  
FAX (617) 451-1914

March 5, 2021

*Via Email Only*

Christian F. Capizzo, Esquire  
Counsel  
Partridge Snow & Hahn LLP  
40 Westminster St, Suite 1100  
Providence, RI 02903

**Re: Bristol County Water Authority – Kickemuit Dams**

Dear Attorney Capizzo:

As you know, I represent the Bristol County Water Authority (“BCWA”), and I am in receipt of your February 25, 2021 letter to Steven Coutu, the BCWA’s Executive Director, regarding the BCWA’s potential removal of the Upper and Lower Kickemuit Dams in Warren, Rhode Island (the “Project”). As we discussed in our conversation on February 26, 2020, your letter raises a number of specific issues, which the BCWA will review and respond to under separate cover. However, at the outset, I want to address two points raised in your letter.

First, you indicate that your clients “stand ready, willing and able to work with the BCWA to address the outstanding issues involving the removal of the two dams.” The same holds true for the BCWA. The BCWA fully understands that a project of this nature impacts a number of constituencies and naturally raises a number of concerns, and the BCWA is working to address these concerns. As you know, the BCWA and its consulting engineer, Pare Corporation (“Pare”), made a presentation directly to your client, the Waterview Condominium Association, on February 18, 2021, and a copy of that presentation is attached. The BCWA is happy to continue working with you and your clients to address issues regarding this Project.

However, I must stress that the BCWA does not agree with your contention that the Project will have an adverse effect on public health and safety in the Town of Warren and surrounding communities. The BCWA’s decisions regarding this Project are based on the best available science and engineering information, and it is these factors that will guide the BCWA. The BCWA would not propose to undertake this Project if it believed public health and safety



would be adversely impacted. Furthermore, the BCWA has received letters of support for the Project from a number of agencies, including Save-the-Bay, the Rhode Island Department of Transportation, the United States Department of Commerce National Oceanic and Atmospheric Administration (“NOAA”), the Rhode Island Department of Environmental Management’s Division of Fish and Wildlife, the Rhode Island Chief Resilience Officer, the Rhode Island Shellfisherman’s Association, the Warren Land Conservation Trust, the Atlantic Coastal Fish Habitat Partnership, and the Town of Warren.

Second, your letter contains the following statements:

“As a practical matter, without an agreement as to how the BCWA intends on addressing the above concerns, we will be forced to deal with the BCWA in a **very public manner** that will play out in **public hearings** before DEM, the Coastal Resources Management Council, the Warren Town Council, the General Assembly, the Rhode Courts and **in the media.**”(emphasis added)

“We do not believe that it is in the best interests of any of the parties to engage in protracted and expensive litigation that will involve extensive third-party discovery as well as **unnecessary public scrutiny.**” (emphasis added)

While the BCWA agrees that protracted litigation does not benefit anyone, we are puzzled by your references to media attention; this matter being discussed in public; public hearings; and, “unnecessary public scrutiny.” The BCWA welcomes public input and has no reservations about discussions surrounding the Project taking place in public. In fact, these discussions *should be* public and transparent. The BCWA’s examination of this Project has been public and transparent, and the BCWA will continue to evaluate this Project in a public manner.

By way of example, the BCWA formed a steering committee to study the impact of removing the dams, and the committee met on several occasions since September 2017. This steering committee included representatives from the Town of Warren, the Warren Conservation Committee, Save the Bay, NOAA, the Town of Swansea, MA, the BCWA and the BCWA’s Board of Directors, and it is my understanding that several of your clients attended some of these meetings. Furthermore, and as referenced above, the BCWA made a public presentation to your client, the Waterview Condominium Association, on February 18, 2021 and made another public presentation to the Warren Town Council on February 24, 2021, a copy of which is publicly posted on the BCWA’s website. (<https://bcwari.com/kickemuit-presentation-powerpoint-02-25-2021/>). In addition, the BCWA has posted additional materials regarding the Project on its website including a synopsis of the Project prepared by the BCWA and Save the Bay (<https://bcwari.com/bcwa-proposed-plan-to-restore-the-kickemuit-river-by-the-removal-of-the-two-kickemuit-reservoir-dams/>); a video prepared by Pare regarding the Kickemuit River’s Tide Cycles (<https://bcwari.com/kickemuit-riversunny-day-tide-cycle-video-with-commentary/>); and, a power point presentation Pare made to the BCWA’s Board of Directors at its January 28, 2020 meeting (<https://bcwari.com/dam-removal-pare/>).

As you know, any and all permits and approvals needed for this Project will be sought in



a public manner through the applicable government agencies. Thus, any suggestion that the BCWA seeks to avoid public scrutiny of this Project is simply not accurate. The BCWA invites public scrutiny and input on this important Project. Hopefully, such public scrutiny and input will provide confidence to all affected parties that the BCWA's decisions on this Project are warranted, supported, and in the public interest.

As indicated above, the BCWA will respond to the remaining issues raised in your letter under separate cover after it has a chance to thoroughly review these issues. In the interim, please do not hesitate to contact me regarding this matter.

I look forward to speaking with you again in the future.

Sincerely,



Joseph A. Keough, Jr.

cc: Ms. Janet Coit, Director, DEM - janet.coit@dem.ri.gov  
Mr. David Chopy, Chief of OC&I, DEM - david.chopy@dem.ri.gov  
Mr. Jeffrey Willis, Exec. Dir., CRMC - jwillis@crmc.ri.gov  
Ms. Kate Michaud, Manager, Town of Warren - kmichaud@townofwarren-ri.gov  
Ms. Keri Cronin, President, Warren Town Council - kcronin@townofwarren-ri.gov  
Atty. Anthony DeSisto, Solicitor, Town of Warren - adlawllc@gmail.com  
Atty. Tricia Jedele, Chief, Env. & Energy, RIAG - TJedele@riag.ri.gov  
Atty. Christy Hetherington, Chief Legal, DPUC - Christy.hetherington@dpuc.ri.gov  
Rep. Jason Knight (District 67) - rep-knight@rilegislature.gov  
Rep. June Speakman (District 68) - rep-speakman@rilegislature.gov  
Sen. Walter Felag (District 10) - sen-felag@rilegislature.gov  
Sen. James Seveney (District 11)- sen-Seveney@rilegislature.gov  
Rep. David Bennet, Chair, House Env. & Nat. Res. Committee - rep-bennett@rilegislature.gov

