

RIDOT Bridge Group 57TB-10: I-195 Washington North Phase 2

Providence and East Providence
PTSID No. 2604M

I-195 Westbound (Bridge No. 700) over the
Seekonk River from East Providence to
Providence, RI

PREPARED FOR:



Rhode Island Department of Transportation
Two Capitol Hill
Providence, RI 02903

PREPARED BY:



1 Cedar Street, Suite 400
Providence, RI 02903



MARCH 2022



March 31, 2022

Ref: 73133.02

Mr. Jeffrey Willis, Executive Director
Coastal Resources Management Council
Oliver H. Stedman Government Center
4808 Tower Hill Road
Wakefield, RI 02879-1900

Re: RIDOT Bridge Group 57TB-10: I-195 Washington North Phase 2
Providence and East Providence, RI
RIC No. 2021-DB-020
PTSID No. 2604M
Category B Coastal Assent Application and RIDPES CGP Authorization

Dear Mr. Willis:

On behalf of the Rhode Island Department of Transportation (RIDOT), VHB is pleased to file this Category B Coastal Assent application to conduct work activities as part of rehabilitation of Washington Bridge North (RIDOT Bridge No. 700), which carries I-195 Westbound from East Providence to Providence, over the tidal waters of the Seekonk River. The contract includes widening a portion of the Washington Bridge deck to accommodate five travel lanes, relocating Gano Street and a segment of the Blackstone River Bikeway to provide a reconfigured on-ramp in Providence, and providing a new off-ramp to Waterfront Drive and a connecting road segment between Valley Street and Waterfront Drive in East Providence. The project will cumulatively disturb more than one acre of soil, so RIDOT is additionally requesting authorization for construction period stormwater discharges under the RI Pollutant Discharge Elimination System (RIPDES) Construction General Permit (CGP).

Please find enclosed four copies of the following application materials: cover letter, the Assent Application Form, Statement of Disclosure and Applicant Agreement as to Fees, Application for Stormwater Construction Permit, Project narrative, and accompanying appendices. Based on communications with staff, we have provided two sets of full-sized Project plans and two sets of 11 x 17-inch Project plans. Please note also that we have not included the building official form or proof of property ownership in recognition of the project type and location. A digital version of the complete application submission has been prepared, and we will coordinate with your administrative staff on retrieval of the digital files.

Thank you for your review of this application. Please feel free to contact either Ms. Alisa Diaz Richardson of RIDOT at (401) 479-1327, or me at (401) 457-7824, if you should have any questions or should require additional information to complete your review.

Very truly yours,

VHB

Scott S. Hobson, PWS
Senior Ecologist
shobson@vhb.com



cc: Alisa Diaz Richardson, MS, PE, PMP, RIDOT | Anthony M. Pompei, PE, PMP, RIDOT | Jeff Klein, PE, VHB



State of Rhode Island and Providence Plantations
Coastal Resources Management Council
 Oliver H. Stedman Government Center
 4808 Tower Hill Road, Suite 3
 Wakefield, RI 02879-1900

(401) 783-3370
 Fax (401) 783-2069

APPLICATION FOR STATE ASSENT

To perform work regulated by the provisions of Chapter 279 of the Public Laws of 1971 Amended.

Project Location	I-195 Washington Bridge Westbound (Bridge No. 700)	Providence and East Providence		File No. (CRMC USE ONLY) 2022-04-050
	No. Street	City/Town		
Owner's Name	RIDOT c/o Alisa Diaz Richardson, MS, PE, PMP Acting Administrator, Environmental Division			Plat: State Highway Lot(s): N/A <small>But see document Appendix B for two proposed parcel ROW takings.</small>
Mailing Address	360 Lincoln Avenue	Warwick	02888	Owner's Contact: Number: (401) 479-1327 Email Address: Alisa.Richardson@dot.ri.gov
	Address	City/Town, State	Zip Code	
Contractor RI Reg. #	GC-33872	Barletta Engineering - Heavy Division Address 40 Shawmut Road, Canton, MA 02021		Email address: bblackery@barlettaco.com Tel. No. (781) 281-6222
Designer	VHB	1 Cedar Street, Suite 400 Address Providence, RI 02903-1023		Tel. No. (401) 272-8100
Name of Waterway	Seekonk River			Estimated Project Cost (EPC): \$70 Million Application Fee: Exempt
Provide Below a Description of Work As Proposed (required).				
The project proposes rehabilitation work on the decks of the Washington Bridge and Gano Street Off-Ramp; widening of Washington Bridge Spans 1-4, Relocation of Gano Street and the Blackstone River Bikeway to Bridge Span 3; construction of a new Waterfront Drive Off-Ramp and new Gano Street On-Ramp, each with new bridge structures; construction of a new connecting road segment between Valley Street and Waterfront Drive; general highway improvements within ROW from Broadway in East Providence to South Main Street in Providence; and associated stormwater management activities.				

Have you or any previous owner filed an application for and/or received an assent for any activity on this property?

(If so please provide the file and/or assent numbers): M2021-12-070 and 2018-05-135

Is this site within a designated historic district? YES NO

Is this application being submitted in response to a coastal violation? YES NO

If YES, you must indicate NOV or C&D Number: N/A

Name/mailling addresses of adjacent property owners whose property adjoins the project site. Accurate mailing addresses will insure proper notification. ADR Applicant **must** initial to certify accuracy of adjacent property owners and accuracy of mailing addresses.

Please see Appendix D of the Category B application document for a complete list of adjacent properties and their owners.

STORMTOOLS (<http://www.beachsamp.org/resources/stormtools/>) is a planning tool to help applicants evaluate the impacts of sea level rise and storm surge on their projects. The Council encourages applicants to use STORMTOOLS to help them understand the risk that may be present at their site and make appropriate adjustments to the project design.

NOTE: The applicant acknowledges by evidence of their signature that they have reviewed the Rhode Island Coastal Resources Management Program, and have, where possible, adhered to the policies and standards of the program. Where variances or special exceptions are requested by the applicant, the applicant will be prepared to meet and present testimony on the criteria and burdens of proof for each of these relief provisions. The applicant also acknowledges by evidence of their signature that to the best of their knowledge the information contained in the application is true and valid. If the information provided to the CRMC for this review is inaccurate or did not reveal all necessary information or data, then the permit granted under this application may be found to be null and void. Applicant requires that as a condition to the granting of this assent, members of the CRMC or its staff shall have access to the applicant's property to make on-site inspections to insure compliance with the assent. This application is made under oath and subject to the penalties of perjury.

RIDOT c/o Alisa Diaz Richardson, MS, PE, PMP
Acting Administrator, Environmental Division

Alisa Diaz Richardson

Digitally signed by Alisa Diaz

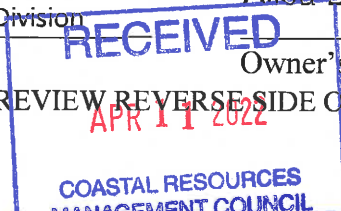
Richardson

Date: 2022.04.06 12:20:08 -04'00'

Owner Name (PRINT)

Owner's Signature (SIGN)

PLEASE REVIEW REVERSE SIDE OF APPLICATION FORM



STATEMENT OF DISCLOSURE AND APPLICANT AGREEMENT AS TO FEES

The fees which must be submitted to the Coastal Resources Management Council are based upon representations made to the Coastal Resources Management Council by the applicant. If after submission of this fee the Coastal Resources Management Council determines that an error has been made either in the applicant's submission or in determining the fee to be paid, the applicant understands that additional fees may be assessed by the Coastal Resources Management Council. These fees must be paid prior to the issuance of any assent by the Coastal Resources Management Council.

The applicant understands the above conditions and agrees to comply with them.

**Alisa Diaz
Richardson**

Digitally signed by Alisa
Diaz Richardson
Date: 2022.04.06 12:20:39
-04'00'

Owner Signature

Date

RIDOT c/o Alisa Diaz Richardson, MS, PE, PMP
Acting Administrator, Environmental Division
306 Lincoln Avenue, Warwick, RI 02888

Print Name and Mailing Address





Application for Stormwater Construction Permit and Water Quality Certification

Use this form to request a Stormwater Construction Permit (RIPDES CGP or GWD/UIC) or Water Quality Certification (WQC). If a Freshwater Wetlands (FWW) Application is required, this form must be submitted in addition to the [FWW Application form](#).

If a WQC is requested as part of a Federal Permit which is not covered under a General Permit and therefore requires 401 certification as described in Section 401 of the Clean Water Act, this form and accompanying materials must be submitted directly to the WQC Program to receive such certification (even if a FWW permit is required).



Please fill out this form electronically. Print the completed form and submit with all required documentation and fee to:

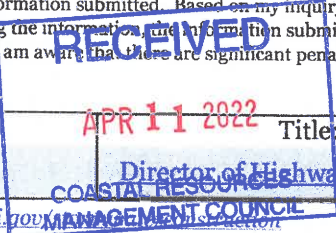
**Permit Application Center (PAC)
RIDEM
235 Promenade Street, Room 260
Providence, RI 02908-5767**

(Check or money order must be made payable to the Rhode Island General Treasurer.)

Stormwater Construction Permit Fee will be waived for applications submitted concurrently with a Freshwater Wetlands Application.

Provide all applicable information by completing the shaded areas.

Double-click to select:		<input checked="" type="checkbox"/> New Permit Fee = \$400.		<input type="checkbox"/> Permit Modification		
Site & Project	City/Town: Providence		Street Address: and East Providence; Washington Bridge		Water Body Class: SB1*	
	Plat(s): State Highway		Lot(s): N/A		Project Name: RIDOT Bridge Group 57/TB-10: I-195 Washington North Phase 2	
	Location: Washington Bridge and surrounding ramps/roads			Water Body Name(s): Seekonk River		
	Latitude: 41.819270	Longitude: -71.387060	Utility Pole #: Various	Total Site Area: 27 acres	Site Area to be Disturbed: 12.4 acres	
	RIDOT PSID #: 2604M		RI Contract #: 2021-DB-020		Was there a Pre-Application Meeting? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Provide Meeting Date: 10/13/21
Owner / Applicant	Organization/Company Name: RI Department of Transportation, c/o:			Name and Email of Owner's Representative for Questions: Anthony Pompei, PE, anthony.pompei@dot.ri.gov		
	First Name: Alisa		Last Name: Diaz Richardson, MS, PE, PMP		Owner's Email: Alisa.Richardson@dot.ri.gov	Phone: (401) 479-1327
	Address: 360 Lincoln Avenue			City/Town: Warwick	State: RI	Zip: 02888
	I certify under penalty of law that I've requested and authorized the investigation, compilation, and submission of all the information, in whatever form, contained in this Application; I have personally examined and am familiar with the information submitted herein; and based on my inquiry of those individuals immediately responsible for obtaining the information, I believe the information is true, accurate and complete. I'm aware that it's the owner's responsibility to implement or hire a qualified contractor responsible to implement any required Soil Erosion and Sediment Control Plan, so as to effectively control stormwater discharges leaving the site during the construction period. I authorize RIDEM personnel access to the property for purposes of observing conditions pertinent to this application and assessing compliance with any permit or determination resulting from this application.					
 Title: Acting Administrator, Env. Division			Date: 4/6/2022			
Professional	Organization/Company Name: VHB			Professional's License Type(s) and Number(s): PE (No. 11185)		
	Professional's Name: Rick Rhodes			Professional's Email: rrhodes@vhb.com		Phone: (401) 457-2019
	I certify under penalty of law that the project described in this application and associated materials is in compliance with the RI Stormwater Design and Installation Standards Manual (as amended) and the Rhode Island Soil Erosion and Sediment Control Handbook (as amended) [if required] and I believe all information presented in this application and the accompanying materials are true, accurate and complete. All engineering designs, plans and specifications [if required] included in this application were done by me or by someone working directly for me. The Natural Heritage Area Information [if required] and the site specific Soil Erosion and Sediment Control Plan [if required] were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering or developing the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete at the time this application is made. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.					
Professional's Signature: 			Title: Director of Highway Engineering COASTAL RESOURCES MANAGEMENT COUNCIL		Date: 4/6/22	



10/15/11

RECEIVED
OCT 15 2011
FEDERAL BUREAU OF INVESTIGATION
U.S. DEPARTMENT OF JUSTICE

10/15/11

PERMIT HISTORY AND APPLICABILITY - Double-click to check all boxes that apply to the proposed project.

Permit History	Provide all other application or file numbers associated with this site.		RIDEM USE ONLY
	RI CRMC Assent:	US Army Corps of Engineers: NAE-2020-01204	
Stormwater Construction Activity	<p>Select all that apply. [Stormwater submissions must comply with all requirements of the Stormwater Management, Design and Installation Rules. Click links below to refer to other applicable Rules.]</p> <p>There are Freshwater Wetlands on the subject or adjacent property, AND the project proposes:</p> <ul style="list-style-type: none"> <input type="checkbox"/> New or increased impervious cover for property other than a single family home; or <input type="checkbox"/> Disturbance of more than 10,000 sq. ft. of existing impervious cover; or <input type="checkbox"/> To fill in any amount of floodplain or alter storm flowage to a river, stream or wetland on any lot. <p style="text-align: center;">Refer to Freshwater Wetland Rules</p>		STW/WQC Application # Required:
	<p>The project proposes an infiltration system listed in 8.21 of the Stormwater Rules (i.e. infiltration trench, infiltration basin, UIC chamber or drywell) that receives stormwater from:</p> <ul style="list-style-type: none"> <input type="checkbox"/> A residential impervious area that is more than 10,000 sq. ft.; or <input type="checkbox"/> A non-residential roof area greater than 10,000 sq. ft.; or <input type="checkbox"/> A non-residential (commercial, industrial, institutional...) road or parking area of any size. <p>Indicate if the treatment system discharges:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Below the ground (UIC); or <input type="checkbox"/> Above the ground and infiltrates (not UIC), but must be reviewed for compliance with the RISDISM to be protective of groundwater. <p style="text-align: center;">Refer to Groundwater Discharge Rules</p>		
	<p>The project proposes discharge of stormwater to waters of the State [including a Separate Storm Sewer System (MS4)], AND :</p> <ul style="list-style-type: none"> <input type="checkbox"/> Disturbs less than 1 acre, but the activity is part of a larger common plan resulting in more than 1 acre of disturbance. <input checked="" type="checkbox"/> Disturbs more than 1 acre of property. <p style="text-align: center;">Refer to RI Pollutant Discharge Elimination System General Permit</p>		
Water Quality Certification (WQC)	<p>Select all project type(s):</p> <ul style="list-style-type: none"> <input type="checkbox"/> Discharge that requires a Federal Permit <ul style="list-style-type: none"> <input type="checkbox"/> Federal Energy Regulatory Commission (FERC) <input type="checkbox"/> Marinas-New Construction or Expansion <input type="checkbox"/> Fill Waters of the U.S. <input type="checkbox"/> ACOE Individual Permit <input type="checkbox"/> ACOE Fill in Coastal Waters <input type="checkbox"/> Other <input type="checkbox"/> Harbor Management Plan <input type="checkbox"/> Flow Alterations/Water Withdrawals <input type="checkbox"/> Stormwater Master Plan <p style="text-align: center;">Refer to Water Quality Rules and Application Guidance</p>		
Submission Requirements	<p>Please submit separately bound documents, as required. Additional copies are required when submitting concurrently with a Freshwater Wetlands Application.</p> <ul style="list-style-type: none"> 1 Site Plan(s) 1 Appendix A Checklist/LID Planning Assessment 1 Stormwater Management Plan (Includes SESC Plan, O&M Plan, and SW Drainage/Analysis Report) <p>Appropriate Fee: New Permit = \$400; Permit Modification = \$200.</p>		Amt Paid: Check No: Date Received:



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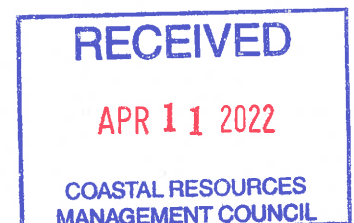
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Introduction

This application for Category B Coastal Assent is submitted for review to the RI Coastal Resources Management Council (CRMC) by the Rhode Island Department of Transportation (RIDOT; the Applicant) to seek authorization for the rehabilitation of Washington Bridge North Phase 2 (RIDOT Bridge No. 700), which carries all I-195 westbound lanes over the Seekonk River, from East Providence to Providence, RI (the Project). Phase 1 of the Project was completed previously under a separate contract and involved partial rehabilitation of the bridge substructure, concrete deck repairs, and partial elimination of bridge joints, as authorized under CRMC Assent No. 2018-05-135. For the current Phase 2 Project, the Applicant has attended two joint, pre-application meetings with CRMC and the RI Department of Environmental Management (RIDEM), as described in Section 2 below. Permitting guidance was received, and some of the design elements incorporated into the current Project are the result of those meetings.

The Project includes minor improvements to the highway proper, the construction and modification of highway on- and off-ramps, the partial relocation of Gano Street and the Blackstone River Bikeway in Providence, and a new roadway connection between Waterfront Drive and Valley Street in East Providence. Work elements specific to the I-195 corridor will occur from the Broadway overpass in East Providence west over the Seekonk River to the South Main Street overpass in Providence (see Figures 1, 2, and 2A in Appendix A for general Project Area and approximate Project limits).

Minor deck work on the Washington Bridge and Gano Street Off-Ramp Bridge was approved under CRMC Maintenance Assent M2021-12-070 (Appendix B), and the work is currently under way. The full Project subject to this Category B application is expected to be completed in November 2025. A summary of primary Project elements is outlined below.



- › Rehabilitation of the Washington Bridge North structure.
- › Partial widening of Washington Bridge Spans 1 through 4 to provide five continuous lanes of I-195 Westbound traffic over the bridge. The widening will enable a through lane on the western end of the Washington Bridge to reduce the weaving movements between Taunton Avenue/Veterans Memorial Parkway On-Ramps and Gano Street Off-Ramp. It will require the construction of new substructure elements.
- › Construction of a new off-ramp from I-195 Westbound to Waterfront Drive in East Providence.
- › Construction of a new bridge structure to carry traffic from the Taunton Avenue and Veterans Memorial Parkway On-Ramps over the new off-ramp to Waterfront Drive. This will be RIDOT Bridge No. 126701 – Waterfront Drive Off-Ramp Bridge.
- › Construction of a temporary on-ramp to re-route traffic from the Taunton Avenue and Veterans Memorial Parkway On-Ramps to eliminate detours and maintain traffic flow during the construction of Bridge No. 126701.
- › Relocation of Gano Street, the eastern end of India Street, and the existing segment of the Blackstone River Bikeway to an alignment beneath Washington Bridge Span 3 along the Seekonk River.
- › Construction of a new bridge structure to carry traffic from relocated Gano Street in Providence onto I-195 Westbound. This will be RIDOT Bridge No. 126601 – Gano Street On-Ramp Bridge and will accommodate pedestrian access beneath the On-Ramp.
- › Construction of new retaining walls to support the embankments around the two new bridge structures (Nos. 126601 and 126701) and the new off-ramp to Waterfront Drive.
- › Construction of a new roadway connector between Waterfront Drive and Valley Street (Valley Street Connector) to the north of other Project elements.
- › Construction of stormwater elements and Best Management Practices (BMPs).
- › Restriping of I-195 Westbound from the Broadway overpass to the new Waterfront Drive Off-Ramp to allow four (4) lanes of through traffic on the mainline, eliminating the current lane drop at Broadway.

RIDOT has awarded the Project as a design-build contract, and the team of Barletta Heavy Division, Aetna Bridge, and VHB are partnered on the Project as the design-build entity (D-B Entity). The Project's initial Preferred Alternative, as proposed under RIDOT's Base Technical Concept (BTC), proposed to accomplish the bridge widening between Spans 1 – 4 via the modification of existing piers and with the addition of new support piers within the tidal waters of the Seekonk River. As part of the D-B Entity's review of the Project, Alternative Technical Concepts (ATCs) were developed, and ultimately accepted by RIDOT, to further minimize and avoid adverse environmental effects. Most notably, the methods to widen Washington Bridge Spans 1 – 4 were modified to eliminate the need for new piers and other substructure work, thereby eliminating and avoiding the in-water activities required

in the former Preferred Alternative. The installation of supports on existing piers within uplands outside the limits of the Seekonk River will still be required, but the need to drive piles, install cofferdams, construct new foundations, or modify existing foundations in the Seekonk River has now been avoided. The only in-water activity proposed for the Project is the temporary use of work barges secured with retractable spuds, as needed only for work on the Washington Bridge.

Much of the proposed work will occur landward of coastal features regulated by CRMC but work will occur within CRMC's regulated 200-foot Area Contiguous to Shoreline Features (200-foot Contiguous Area). Accordingly, the Project is subject to the jurisdictions of CRMC and its implementing regulations, the RI Coastal Resources Management Program (CRMP) at 650-RICR-20-00-1. The CRMP designates the Seekonk River as Type 4 Multipurpose Waters and the navigation channel in the middle of the River as a Type 6 Commercial Navigation Channel.

The Assent Application Form, Disclosure Statement and Applicant Agreement as to Fees, Application for Stormwater Construction Permit, this application narrative, and the narrative appendices, including the separately bound plan set and supporting technical documents, comprise the complete application package. This application narrative serves to address the written Category B requirements and other relevant sections of the CRMP and further describes the Project's permitting history to date, existing conditions, proposed Project activities, and anticipated Project effects to areas under Council jurisdiction.

1.1 Purpose and Need

RIDOT acutely recognizes the need to keep I-195 and its infrastructure well maintained and configured in the most effective practicable means to maximize structure longevity, maximize traffic operations, and minimize congestion. The purpose of the Project is to maintain and improve a critical piece of highway infrastructure in the heart of Rhode Island with the primary objectives as outlined below.

1. Reduce peak-period congestion on I-195 Westbound within the Project corridor.
2. Reduce crashes in the Project Area.
3. Eliminate conflicting traffic weaving movements with vehicles entering and exiting I-195 Westbound to increase safety and decrease congestion.
4. Bring the Washington Bridge up to a state of good repair, pursuant to the primary objective codified in RhodeWorks, and to prevent further deterioration of the bridge.
5. Improve access to Opportunity Zones on both sides of the Washington Bridge and facilitate reliable freight movement through the Northeast Corridor to support economic competitiveness.
6. Reduce congestion-related air emissions.



1.2 Property Ownership

All components of the Project will occur on RIDOT/State land, with the exception of two privately-owned parcels that will be acquired in East Providence. Permanent acquisition of 62 – 78 Valley Street is needed where 19,532 square feet (sf) of right-of-way (ROW) will be required to accommodate the new Waterfront Drive Off-Ramp from I-195. Permanent acquisition of a second parcel, identified as 160 Valley Street, will be required where 20,740 sf of ROW will be taken to provide a short turn-lane to connect Valley Street and Waterfront Drive. No relocations of businesses or residences will be required for either acquisition, and the ROW acquisitions will be completed in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (Uniform Act, as amended). RIDOT's Office of Real Estate Acquisition will be responsible for certifying that the ROW acquisitions meet the requirements of the Uniform Act. Taking maps for both parcels are presented in Appendix C.

1.3 List of Adjacent Property Owners (Relative to Category B Work Activities)

A table listing adjacent properties and their owner identifications has been compiled for the Gano Street Relocation portion of the Project, which is believed to be the sole Project activity that triggers the Category B filing¹. Map insets have been provided in the table for each parcel so that the location of each adjacent parcel in reference to the general proposed work area could be more readily understood. The table is presented as Appendix D, and information contained in the table was obtained from the City of Providence, Department of Planning and Development's, Web Mapping Application, "Where's My Parcel and What's My Zone²." Adjacent properties have been selected for their proximity to proposed work activities that will occur within the 200-foot Contiguous Area of the Gano Street Relocation. Adjacent properties across public streets have been included in the table.

Adjacent properties concerning bridge deck work and Project work activities on the East Providence side of the Seekonk River, as described in Section 4 of this document, have not been included. Should CRMC permitting staff find that additional Project Areas require property owner notification, then the table will be amended to include the additional parcel and owner information.

1 Other project elements if taken individually may be approvable under Category A or Maintenance Assent applications.

2 <https://providence-gis-hub-pvdgis.hub.arcgis.com/apps/pvdgis::wheres-my-parcel-and-whats-my-zone/explore>



2

Permitting History and Overview

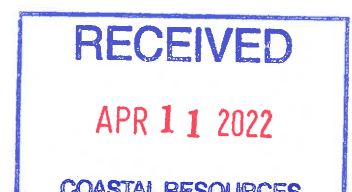
A consultation meeting was held to discuss stormwater aspects of the Project on April 27, 2020, with the Applicant, CRMC, RIDEM Office of Water Resources and Office of Customer and Technical Assistance, and AECOM representatives. A subsequent pre-application meeting with the Applicant, CRMC, RIDEM Office of Water Resources, and the D-B Entity was held on October 13, 2021, to discuss changes in the Project related to ATCs that had been incorporated into the Project. Minutes of both meetings are presented in **Appendix E**.

During the October 13, 2021, pre-application meeting, Project components and phasing were outlined, and jurisdictions and required CRMC and RIDEM approvals were discussed. It was established that CRMC will take lead jurisdiction over the entire Project. Three primary components of the Project were distinguished and discussed with respect to CRMC and RIDEM permitting requirements. They are the complete Project, aerial work associated with the Washington Bridge deck and Gano Street Off-Ramp, and advanced ramp work on the East Providence side of the Seekonk River. Each of the three components is described separately below.

1. The Complete Project

While much of the Project will occur outside of CRMC footprint jurisdiction, the Gano Street and Bikeway Relocation, work at the intersection of Waterfront Drive and the proposed Waterfront Drive Off-Ramp, and improvements to an existing stormwater management feature (detention pond) associated with the Valley Street Connector will occur within CRMC's 200-foot Contiguous Area. The Gano Street and Bikeway Relocation, Waterfront Drive work, and Valley Street Connector roadwork will require significant earth moving activities and commensurate stormwater management provisions.

CRMC permitting staff determined that a Category B filing is consistent with CRMP §1.1.5.A (Table 1) for the Gano Street and Bikeway Relocation, and more



specifically with the Activity Matrix for Type 4 Waters involving construction of public roads and bridges adjacent to Manmade Shorelines. It was established that the Category B application should reflect all facets of the Project and should include stormwater review for the complete Project, including for the work described in Project Components 2 and 3 below. Accordingly, this Category B application contains a Stormwater Management Plan, Operation and Maintenance Plan, and RIDOT Large-Site Stormwater Pollution Prevention Plan (SWPPP) for the complete Project.

2. **Repairs to the Washington Bridge Deck and Gano Street Off-Ramp**

The pre-application meeting established that certain work associated with the Washington Bridge deck and Gano Street Off-Ramp could begin under a Maintenance Certification Assent, prior to the filing of the Category B application for the complete Project. Accordingly, a Maintenance Certification Request was filed with CRMC on December 23, 2021 and approved under Maintenance Assent No. 2020-12-070 on January 27, 2022 (**Appendix B**). The specific activities authorized include the following:

- Removal of bridge deck pavement for purposes of deck repair on the Washington Bridge.
- Removal of bridge deck concrete at bridge joint locations for joint elimination and repair/replacement on the Washington Bridge and bridge spans of the Gano Street Off-Ramp.
- Concrete bridge barrier replacement, including temporary light pole impacts on the Gano Street Off-Ramp.
- Bridge deck and superstructure concrete repairs on Washington Bridge and the Gano Street Off-Ramp.

Construction activities permitted under the Maintenance Assent began in January 2022 and are anticipated to remain ongoing through summer 2022. A RIDOT Small-Site SWPPP was prepared to address good housekeeping measures for the deck and ramp work outlined above, in addition to soil disturbances totaling less than one acre for the advanced Waterfront Drive Off-Ramp work described below.

3. **Waterfront Drive Off-Ramp**

Advanced work associated with construction of the Waterfront Drive Off-Ramp outside of CRMC jurisdiction was presented and discussed at the pre-application meeting. Components of the work will include a temporary on-ramp to accommodate traffic from Taunton Avenue and Veterans Memorial Parkway while the Waterfront Drive Off-Ramp is being constructed, a new bridge to carry Taunton Avenue and Veterans Memorial Parkway over the proposed Waterfront Drive Off-Ramp, and construction of a portion of the Waterfront Drive Off-Ramp (see color-coded and labeled areas in **Figure 2A of Appendix A**).

It was established that the Waterfront Drive Off-Ramp work is outside of CRMC jurisdiction and could proceed without CRMC Assent. The need for RI Pollutant Discharge Elimination System (RIPDES) permitting to construct the work activities was discussed at the meeting, and the results of those discussions are presented below in Section 2.2.2.1. A portion of the work area on Waterfront Drive will fall within the 200-foot Contiguous Area, so it was established that work on Waterfront Drive and the off-ramp intersection will not occur until Category B Assent has been issued for the Project (see Waterfront Drive area shaded in yellow in **Figure 2A of Appendix A**). As requested by CRMC, the complete ramp design, drainage design, and accompanying drainage calculations for the advanced Waterfront Drive Off-Ramp work have been included as part of this Category B application.

Other advanced work includes highway median barrier replacement work off the Washington Bridge and upland of the 200-foot Contiguous Area (**Figure 2 of Appendix A**). Barrier replacement work began in East Providence in Winter 2022, and construction of the temporary Taunton Avenue and Veterans Memorial Parkway On-Ramp is expected to begin in Spring 2022.

2.1 Local Regulatory Requirements

In November 2019, RIDOT received a \$25 million Better Utilizing Investments to Leverage Development (Build) Grant from the US Department of Transportation, enabling work on the Phase 2 Washington Bridge Rehabilitation and Redevelopment Project with a Design-Build delivery method. As a result of the public grant application, RIDOT coordinated with the Cities of Providence and East Providence as part of the Federal Highway Administration's National Environmental Policy Act (NEPA) screening process. This coordination has led to several design changes regarding how the Washington Bridge will intersect with local streets, particularly in East Providence.

With respect to the need for RIDOT to obtain local permits from either the City of Providence or East Providence, RIDOT is not subject to municipal jurisdiction. No local zoning approvals are required for the Project, such that the Building and Zoning officials' signoffs are not required.

2.2 State Regulatory Requirements

2.2.1 Coastal Resources Management Council

The Project Area spans land areas regulated separately by CRMC and RIDEM with respect to freshwater wetland and coastal feature jurisdictions, as indicated on the "Wetland Jurisdiction" overlay of RIDEM's Environmental Resource Map (see **Figure 3 in Appendix A**). Given that the most significant work activities will occur proximate to the tidal waters of the Seekonk River, CRMC has taken lead jurisdiction over the entire Project. This Category B Assent application serves as the mechanism



for state freshwater wetlands/coastal feature approval and for federal Coastal Zone Management Act (CZMA) consistency.

Included as part of this Category B application is an application for RIPDES Construction General Permit (CGP) authorization concerning construction-period stormwater discharges, as described further in Section 2.2.1.3 below.

2.2.1.1 Coastal Resources Management Program

The primary set of regulations pertaining to the Project and this Category B application is the CRMP at 650-RICR-20-00-1. This application narrative has been structured in consideration of the CRMP, and Section 5 specifically addresses compliance with CRMP sections most applicable to the Project, including written Category B requirements and variance procedures.

2.2.1.2 CRMC Special Area Management Plans

The Project Area falls within the boundaries of CRMC's Metro Bay and Shoreline Change Special Area Management Plans (SAMPs). The Metro Bay SAMP (650-RICR-20-00-5) provides a mechanism by which development in the metro Providence area can occur responsibly with coastal resource protection and increased access opportunities for the public. The Shoreline Change SAMP (not codified at the time of application), known also as the Beach SAMP, outlines a process through which applicants address the coastal hazards associated with climate change.

The Coastal Hazard Application's list of projects that must complete the CRMC Coastal Hazard Application Worksheet,³ includes the construction of any new private or public roadway, regardless of length, and construction of any new infrastructure project subject to §§ 1.3.1(F), (H), and (M), where "M" refers to new public roads and bridges. A CRMC Coastal Hazard Application Worksheet has been completed for the Gano Street and Bikeway Relocation and is provided in **Appendix F**. A VHB memorandum is provided in **Appendix F** to explain the methods used in the completion of the Worksheet, and a summary of the study results is presented in Section 5.7 of this application narrative.

The Applicant acknowledges the Urban Coastal Greenways (UCG) aspect of the Metro Bay SAMP and its associated mapping of UCG Zones, as well as its High Priority Conservation Areas (HPCAs) and High Priority Restoration Areas (HPRAs). The SAMP's UCG Zone Map (SAMP Figure 2) indicates that areas of proposed Project work in East Providence will occur in a "Development Zone," while work activities associated with proposed maintenance of existing stormwater treatment water quality ponds for the Gano Street Relocation in Providence will occur within an "Area of Particular Concern." The maintenance work would remain within the confines of the water quality ponds and would be limited to reshaping of an existing stone weir and removal of accumulated sediment in the sediment forebay. Based on the mapped zones illustrated in Appendix 4 of the Metro Bay SAMP, the Project will

³ <http://www.crmc.ri.gov/coastalhazardapp.html> accessed February 2022.

occur outside of HPCAs and HPRAs, with the exception of maintenance activities proposed at an existing detention pond off Waterfront Drive in East Providence. The detention pond is mapped within an HPRAs "Restoration Zone." The proposed maintenance activities will remain within the banks of the detention pond and will occur within the confines of an existing chainlink perimeter fence that isolates the pond.

2.2.1.3 Rhode Island Pollution Elimination System Program – For the Complete Project

The Project will cumulatively result in greater than one acre of soils disturbance, and consequently will require authorization under the RIPDES CGP. An application for RIPDES authorization accompanies this Category B filing, with the required technical documentation. The accompanying RIDOT Large-Site SWPPP has been prepared consistent with the elements of a Soil Erosion and Sediment Control Plan (as specified in the RIPDES CGP) and incorporates relevant elements of the Stormwater Management, Design, and Installation Rules (Stormwater Rules), at 250-RICR-150-10-8, and the latest version of the Rhode Island Soil Erosion and Sediment Control Handbook (RISESCH).

2.2.2 Rhode Island Department of Environmental Management

The application of RIDEM regulations were discussed with RIDEM at the October 13, 2021 pre-application meeting and during separate consultation. Explanations are provided in the subsections below.

2.2.2.1 Rhode Island Pollution Elimination System Program – Advanced Work

It is the Design-Build Team's intention that the advanced work activities in East Providence, described above, will be implemented with less than one acre of exposed soils disturbance. It was established at the pre-application meeting that the advanced work activities could proceed in the absence of RIPDES authorization, provided that the cumulative area of exposed soils remains under one acre. It was reiterated that if the cumulative area of exposed soils were to exceed one acre for the advanced work, then authorization under the RIPDES CGP must be obtained. This "interim" application would be filed directly with RIDEM for authorization separate from a future authorization provided when CRMC issues a State Assent for the complete Project (Refer to RIPDES CGP Section I.D.1.b.). The interim RIPDES application would be accompanied by a Soil Erosion and Sediment Control Plan, a RIDOT Small-Site SWPPP, and supporting documentation commensurate with any temporary stormwater management features that might be proposed.

2.2.2.2 Water Quality Certification

During discussions held with RIDEM Office of Water Resources permitting personnel at the October 13, 2021 pre-application meeting, it was determined that Water Quality Certification (WQC) under either RIDEM's State WQC Regulations or under Section 401 of the Clean Water Act (CWA) is not required, given that no activity or

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stormwater discharge triggers are associated with the Project. RIDEM indicated that temporary work barges secured with spuds do not trigger WQC. The Project has been designed such that no new stormwater point discharges are proposed.

2.2.2.3 Natural Heritage Program

A review of the RIDEM-hosted Environmental Resource Map indicates that a Natural Heritage polygon for special-status species is present at the southwest corner of the Project Area (see **Figure 7** in **Appendix A**). Consultation with RIDEM indicated that the mapped polygon is associated with salt reedgrass (*Spartina cynosuroides*). Given the recorded location of the species and the location of the specific Project elements, no further consultation or permitting considerations are necessary. Additional information regarding the species occurrence is presented in Section 3.4.8 of this narrative.

2.2.2.4 Controlled and Hazardous Materials

On behalf of RIDOT, VHB submitted a Construction-Phase Soil and Groundwater Management Plan (SGMP) to the RIDEM Office of Land Revitalization and Sustainable Materials Management (LRSMM) on December 3, 2021 to outline the management of contaminated soil and groundwater in Providence and East Providence during construction of the Project. The SGMP outlines the regulatory requirements that the D-B Entity will be required to comply with during construction, including oversight of construction activities; the documentation of compliance with the SGMP via operations logs, photographs, field measurements, etc.; and the implementation of engineered controls (i.e., capping). The SGMP also outlines regulatory requirements following completion of the Project, including the submission of a Remedial Action Closure Report, preparation of an Environmental Land Use Restriction, and post-construction Soil Management Plan, in accordance with Section 9.0 of the Rules and Regulations for the Investigation and Remediation of Hazardous Material Releases (Remediation Regulations) at 250-RICR-140-30-1. RIDEM reviewed the SGMP and issued a Remedial Approval Letter on December 9, 2021, under existing Site Remediation No. SR-28-1386 for Washington Bridge, which approves the SGMP and specifies conditions for compliance. A copy of this letter is included in **Appendix G**.

2.3 Federal Regulatory Requirements

2.3.1 National Environmental Policy Act

RIDOT prepared a Categorical Exclusion (CE) Project Narrative and Checklist for the Project to fulfill the requirements pertaining to federally funded projects under the NEPA as directed by the Federal Highway Administration (FHWA). A categorical exclusion (CE) is a class of actions that a federal agency determines, consistent with the Council on Environmental Quality, will not individually or cumulatively result in a significant effect on the environment, and for which an Environmental Assessment or

an Environmental Impact Statement is not normally required. The CE for the initial preferred alternative was approved by the FHWA on August 12, 2021.

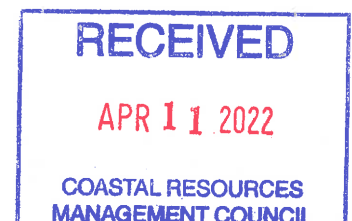
A CE-Reevaluation memorandum was prepared to account for the changes in Project design related to the incorporation of the ATCs following RIDOT's selection of the D-B Entity. The most significant modifications to the initial preferred alternative were the elimination of all in-water work due to different bridge-widening techniques and the relocation of Gano Street and the Blackstone River Bikeway segment. Updated consultations with the federal agencies to account for the approved ATCs, outlined below, were a significant part of CE and CE Re-Evaluation preparation.

2.3.2 National Historic Preservation Act of 1966

Section 106 of the National Historic Preservation Act of 1966, as amended, requires that Federal agencies consider the effects of their federally funded projects on historic properties. The above-ground architectural reconnaissance survey conducted by RIDOT Cultural Resources Unit (CRU) identified one historic property listed, or eligible for listing, on the National Register of Historic Places within the Project Area of Potential Effects (APE). The property is the Hunter S. Marston Boathouse, which is part of the Providence Landmarks District (PLD) Industrial & Commercial Buildings District, a non-contiguous, thematic local historic district designated in 2002 throughout the City of Providence. The building was constructed ca. 1950 as an industrial building and was purchased by Brown University in 1967 for use as their boathouse. It is located on the westerly banks of the Seekonk River, southerly of the Washington Bridge.

The Project does not meet the requirements of RIDOT's executed 2014 Programmatic Agreement for Minor Transportation Projects with FHWA, so the standard Section 106 consultation procedure has been followed. A Project specific Programmatic Agreement was executed with consulting parties in accordance with 36 CFR 800.4(b)(2) – *phased identification and evaluation*, and signed by FHWA on July 29, 2021, to complete the Section 106 procedure (**Appendix H**). The Project will result in no Adverse Effect to the Hunter S. Marston Boathouse, as the property will sustain no physical impact and only minimal visual impact associated with the proposed activity. Agreed-upon procedures and protocols pertaining to historic archaeological resources of significance for the Project will follow the stipulations of the Programmatic Agreement, including the monitoring of subsurface excavations during construction in areas of moderate to high historic period archaeological sensitivity.

The realignment of Gano Street and Blackstone River Bikeway as now incorporated into the Project will bring Project activities closer to the Hunter S. Marston Boathouse property than the initial Project design, but no encroachments will occur. RIDOT CRU reviewed the revised limits of the Gano Street and Bikeway relocations and determined that the initial findings remain valid, as documented in RIDOT CRU correspondence dated October 22, 2021 (**Appendix H**).



2.3.3 U.S. Department of Transportation Act of 1966

Six properties in the Project Area meet requirements of Section 4(f) of the US Department of Transportation (USDOT) Act of 1966. They are the Hunter S. Marston Boathouse, India Point Park, Gano Park, George Redman Linear Park, East Bay Bike Path, and Seekonk River (see **Figure 2A** in **Appendix A**). The RIDOT CRU assessed the Project limits and considered the three types of Section 4(f) use (permanent incorporation, temporary occupancy, and constructive use). RIDOT CRU determined that none of the Project's proposed activities would interfere with historic integrity, the ability of the properties to serve as wildlife or waterfowl refuges, if currently doing so, or current or potential recreational activities at the stated Section 4(f) properties. Based on the Project scope and RIDOT CRU review, it was determined that no Section 4(f) Evaluations were required.

With respect to the Hunter S. Marston Boathouse, as described in the preceding subsection above, the Boathouse is protected under Section 4(f) as a privately-owned historic site eligible for listing on the National Register of Historic Places. The Project will cause no loss of historic integrity and will keep the Gano Street and Bikeway Relocation work on public property with no encroachment onto the Boathouse property.

RIDOT CRU reviewed the limits of the proposed Gano Street and Bikeway Relocation incorporated into the Project under the ATCs and determined via correspondence dated October 22, 2021, that no changes to the initial findings would be necessary (**Appendix H**). The finding of "no use" remains valid.

2.3.4 Endangered Species Act of 1973

2.3.4.1 U.S. Fish and Wildlife Service

The presence of plant and animal species federally listed for special status was explored for the Project Area, in accordance with the Endangered Species Act of 1973 (ESA) (87 Stat. 884, as amended, 16 U.S.C. Ch. 35, § 1531, et seq.). An Official Species List was generated for the Project using the U.S. Fish and Wildlife Service's (USFWS) Environmental Conservation Online System (ECOS) Information for Planning and Consultation (IPaC) tool on December 1, 2021. The Official Species List generated via the ECOS-IPaC system included the following species and their protection status:

- › Northern long-eared bat (*Myotis septentrionalis*; NLEB) – Threatened
- › Monarch butterfly (*Danaus plexippus*) – Candidate
- › Northeast U.S. nesting population of roseate tern (*Sterna dougallii*) – Endangered

Critical habitats for the listed species have not been identified within the Project Area. RIDOT has completed the automated consultation for the NLEB via the IPaC-assisted Determination Key for FHWA, FRA, FTA Programmatic Biological Opinion for Transportation Projects in the Range of the Indiana Bat and Northern Long-Eared

Bat. A consistency letter documenting a no effect determination was generated on December 21, 2021 (see **Appendix I**). As a candidate species, the monarch butterfly does not have legal protections under ESA, but RIDOT finds it unlikely that Project activities would result in adverse impacts on this species given the developed nature of the Project Area.

The roseate tern is a coastal marine tern that forages offshore and nests on offshore islands and outer beaches. Its northeastern population was listed as endangered by the USFWS in 1987 (USFWS, 2011).⁴ Ninety percent of the roseate tern's northeastern population breeds from the Cape Cod, MA to Long Island, NY area on rocky coastal islands, outer beaches, and salt marsh islands having protective vegetation to conceal nests (Veit and Petersen, 1993⁵; USFWS, 2001⁶). As noted in prior consultations with USFWS, during pre-migratory staging in August-September, roseate terns feed over coastal waters between Long Island, NY, and Maine. During this time, they roost on islands and outer beaches. The Project Area does not include suitable habitat for the roseate tern, so it is unlikely that the species would occur within the Project Area. Consequently, RIDOT has determined that the Project will have no effect on the federally endangered roseate tern based on the absence of its habitat requirements. Consultation with USFWS regarding this species is not required due to the "no effect" determination reached by RIDOT based on absence of suitable habitat within the Project Area.

2.3.4.2 National Oceanic and Atmospheric Administration Marine Fisheries

Prior to development of the ATCs, the Project proposed activities within the tidal waters of the Seekonk River and required consultation with National Oceanic and Atmospheric Administration (NOAA) Fisheries Greater Atlantic Regional Fisheries Office (GARFO) Protected Resources Division (PRD), which administers Section 7 of the ESA as it relates to endangered and threatened vertebrate marine species and important marine habitat. Consultation was required in recognition that two federally listed fish species were identified as having potential to occur in the Seekonk River – the Atlantic sturgeon (*Acipenser oxyrinchus oxyrinchus*) and shortnose sturgeon (*Acipenser brevirostrum*). RIDOT submitted the FHWA GARFO Not Likely to Adversely Affect (NLAA) Program Appendix A Verification Form for the Project on April 1, 2021, and received the signed verification form on April 13, 2021, which serves as concurrence from NOAA Fisheries GARFO PRD, thereby completing the programmatic ESA Section 7 consultation process. NOAA Fisheries GARFO PRD concurred with RIDOT's determination that the action is not likely to adversely affect the listed species or critical habitat, provided that the mitigation measures indicated at that time are followed.

4 U.S. Fish and Wildlife Service. 2011. Roseate tern: North American Subspecies Fact Sheet. Available at: <https://www.fws.gov/northeast/pdf/Roseatetern0511.pdf>. Accessed January 10, 2022.

5 Veit, Richard R. and Wayne R. Petersen. Bird of Massachusetts. Massachusetts Audubon Society, 1993. 161-162, 233-234.

6 United States Fish and Wildlife Service. March 2001. Roseate Tern Habitat Model. Available at: http://www.fws.gov/r5gomp/gom/habitatstudy/metadata/roseate_tern_model.htm. Accessed January 10, 2022.



The new proposed Project design that incorporates the ATCs further reduces the potential for adverse effects by eliminating construction activities in tidal waters and fringes. RIDOT re-consulted with NOAA Fisheries GARFO PRD to determine if Section 7 consultation would need to be reinitiated for the current Project and its proposed use of temporary spud barges in tidal waters. Via November 30, 2021, email correspondence, NOAA Fisheries GARFO PRD determined that consultation does not need to be reinitiated and on December 21, 2021, confirmed that mitigation measures, including Time of Year (TOY) Restrictions, are no longer required for the Project (see **Appendix J**).

2.3.5 Magnuson-Stevens Fisheries Conservation and Management Act

16 U.S.C. § 1855(2) of the Magnuson-Stevens Fisheries Conservation and Management Act requires federal agencies to consult with the Secretary of Commerce, through NOAA Fisheries, with respect to "any action authorized, funded, or undertaken, or proposed to be authorized, funded, or undertaken, by such agency that may adversely affect any Essential Fish Habitat (EFH) identified under this Act." Consultation with NOAA Fisheries GARFO Habitat Conservation Division (HCD) regarding EFH, was required for the previous Project design in recognition that work would be proposed in the tidal waters of the Seekonk River. EFH mapped for the Seekonk River is suited to 16 fish species, while Habitat Areas of Particular Concern (HAPC) are mapped for certain life stages of two fish species. RIDOT submitted the FHWA-GARFO Programmatic Agreement Appendix B Verification Form for the previous Project design on April 2, 2021, and received the signed verification form on May 4, 2021, serving as concurrence from NOAA Fisheries GARFO HCD under the programmatic EFH consultation. NOAA Fisheries GARFO HCD concurred with the determination that the former Preferred Alternative was consistent with the programmatic EFH consultation and determined that adverse effects to EFH would not be substantial if the conservation recommendations indicated at that time were to be followed.

The new proposed Project design that incorporates the ATCs further reduces the potential for adverse effects to EFH by eliminating pile driving, cofferdam installation, and all other in-water construction activities, such that displacement of EFH and adverse noise impacts to EFH species are no longer applicable. RIDOT conducted follow-up coordination with NOAA Fisheries GARFO HCD to describe the revised Project design concept, including the proposed temporary use of spud barges in the Seekonk River. Via correspondence dated November 30, 2021, NOAA Fisheries GARFO HCD confirmed that EFH consultation would not need to be re-initiated for the ATC design changes, and subsequent correspondence from NOAA Fisheries on December 21, 2021, indicated that TOY Restrictions would no longer be applicable to the Project (see **Appendix K**).

2.3.6 Coastal Zone Management Act of 1972

Category B Coastal Assent, once issued by RI CRMC, will serve as the mechanism for federal Coastal Zone Management Act (CZMA) consistency. See Section 2.2.1 above.

2.3.7 Section 404 of the Clean Water Act & Section 10 of the Rivers and Harbors Appropriation Act of 1899

Given the lack of in-water work and lack of fills in tidal and nontidal wetlands now proposed, Project elements no longer require permitting with the U.S. Army Corps of Engineers (USACE) under Section 404 of the CWA and Section 10 of the Rivers and Harbors Act. Updated consultation with USACE has indicated that use of temporary spuds associated with work barges will be permissible as Self-Verification activities under RI General Permit 2 – Repair and Maintenance. A copy of November 24, 2021, email concurrence and correspondence issued by USACE under File No. NAE-2020-01204 on March 24, 2022, is provided in **Appendix L**.

2.3.8 Section 401 of the Clean Water Act

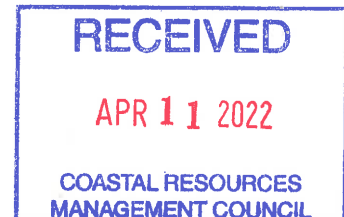
Based on the Project design now eliminating all work in wetlands and Waters of the U.S., it was determined at the October 13, 2021, joint pre-application meeting that no Project elements exist that trigger Section 401 WQC. See Section 2.2.2.2 above.

2.3.9 Section 408 of Section 14 of the Rivers and Harbors Appropriation Act of 1899

Work is not proposed within the Seekonk River Federal Navigation Project, a Civil Works Project managed by USACE. With the implementation of ATCs and the use of temporary work barges secured by retractable spuds, updated coordination with the USACE Navigation permitting group was initiated on December 2, 2021. It was determined that permitting under Section 408 (at 33 USC 408), concerning the federal navigation channel, is not required. Correspondence issued by USACE under File No. NAE-2020-01204 on March 24, 2022, identifies one condition concerning Section 408 compliance and concludes the Section 408 consultation (**Appendix L**)

2.3.10 Section 9 of the Rivers and Harbors Appropriation Act of 1899 & General Bridge Act of 1946

Pursuant to Section 9 of the Rivers and Harbors Appropriation Act of 1899 and the General Bridge Act of 1946, projects that propose to construct, reconstruct, or modify a bridge or causeway across navigable Waters of the U.S are required to obtain authorization from the U.S. Coast Guard (USCG) prior to commencing construction or modification work. In 2016, the USCG authorized the Phase I rehabilitation work for the Washington Bridge via an Authorization for Maintenance, dated October 12, 2016.



RIDOT subsequently consulted with USCG for the proposed scope of work for the current Washington Bridge North Phase 2 Project, and the USCG determined that the current Phase 2 work will be covered by the 2016 Authorization issued for Phase 1, such that no separate permit will be required for Phase 2. Coordination with USCG will be required through Phase 2 barge use, and project schedules and a work plan for the temporary work barges will be provided to USCG. Furthermore, the D-B Entity has coordinated with the local Harbormaster and will continue to do so while work barges are in use.



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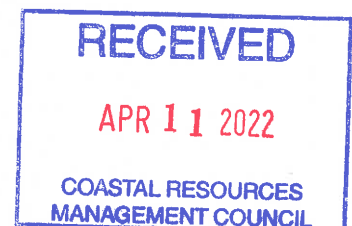
Existing Conditions

3.1 Project Area

The Project Area is centered around the four-lane Washington Bridge North, which spans the tidal waters of the Seekonk River between Providence and East Providence at a significant elevation above the river (approximately 42 feet above Mean High Water at the navigation channel).

In Providence, the Project Area extends west within the highway ROW, ending approximately aligned with South Main Street. Included within the Project Area in Providence are the elevated section of the existing Gano Street Off-Ramp, land associated with a proposed eastward relocation of Gano Street, the adjacent Blackstone River Bikeway, a proposed improved Gano Street On-Ramp, and restoration and retrofitting of the three existing water quality ponds in the Gano Street Off-Ramp infield (see Figure 2 in Appendix A for Project Area and Project limits).

In East Providence, the Project Area extends east within the highway ROW to Broad Street and includes land areas needed to construct the following: a new off-ramp to Waterfront Drive, a new stormwater treatment unit (STU) for this off-ramp, and a new bridge to carry Taunton Avenue/Veterans Memorial Parkway On-Ramp over the new Waterfront Drive Off-Ramp. Additionally, in East Providence, RIDOT proposes to eliminate the Valley Street terminus at Warren Avenue and create an interconnection between Valley Street and Waterfront Drive in a separate, isolated part of the Project Area north of the Waterfront Drive Off-Ramp. This work will involve maintenance of an existing detention pond west of Waterfront Drive (see Figure 2 in Appendix A).



3.2 Bridge Condition

The Washington Bridge North is currently in poor structural condition, and the current design of on- and off-ramps servicing the bridge creates a series of conflicting weaves that are inefficient and safety deficient. The Bridge currently carries a superstructure rating of 4 (Poor). Its deck area occupies more than 145,000 square feet, and its 18 spans will all require work during the rehabilitation effort. An inspection report completed in 2017 indicates that the underside of the deck suffers from numerous issues, including exposed rebar throughout, rust staining and concrete efflorescence, hairline cracking and hollow areas, and isolated spalls. Timber shielding currently installed beneath the bridge is an interim measure to prevent debris from falling into the Seekonk River or onto city streets. Despite numerous measures taken over the years to maintain the condition of the Washington Bridge, the structure now requires intensive rehabilitation and repair.

3.3 CRMC/RIDEM Coastal Feature and Freshwater Wetland Jurisdictions

CRMC and RIDEM established a "Jurisdictional Boundary," pursuant to RI General Laws § 46-23-6, that designates areas of freshwater wetland authority. Based on the Wetland Jurisdiction overlay within RIDEM's Environmental Resource Map, CRMC jurisdiction on the Providence side of the Seekonk River extends along Gano Street, juts west along the Gano Street On-Ramp, and then approximately follows I-195 west to the South Main Street project limit. In East Providence, the jurisdictional demarcation line follows I-195 eastbound to the Veterans Memorial Parkway Off-Ramp, extends north along Waterfront Drive, and then follows former rail lines leading to and from the Crook Point Bascule Bridge over the Seekonk River. The tidal waters of the Seekonk River and all areas located seaward of the jurisdictional demarcations described above are entirely within CRMC jurisdiction (see Section 3.4.1 below). A triangular area circumscribed by Waterfront Drive and the two former railroad lines to the steel bridge is within RIDEM freshwater wetland jurisdiction. **Figure 3 in Appendix A** reflects the jurisdictional mapping provided on RIDEM's Environmental Resource Map and illustrates the demarcations described above.

Despite appreciable portions of the Project Area falling within RIDEM's jurisdiction east of the Seekonk River, including at the proposed Valley Street Connector, CRMC is the lead state regulatory entity for review of the Project, as provided in preceding Section 2.2.1.

3.4 Setting and Environmental Conditions

Descriptions of the Project setting and existing environmental conditions are presented in the subsections below. The tidally influenced Seekonk River is the primary environmental resource associated with the Washington Bridge, so water resources related elements are discussed first below.

3.4.1 CRMC Water Type Classifications

In the Project Area, the tidal waters of the Seekonk River, are primarily designated by CRMC as Type 4 Multipurpose Waters (CRMP § 1.2.2.E). Within this designation, the federal navigation channel under Bridge Span 7 is demarcated separately as a Type 6 Commercial Navigation Channel (CRMP § 1.2.2.G). **Figure 4 in Appendix A** presents the Water Types as depicted in CRMC's Map of Water Type Classifications for Providence, Pawtucket, and East Providence (Metro Bay – North).

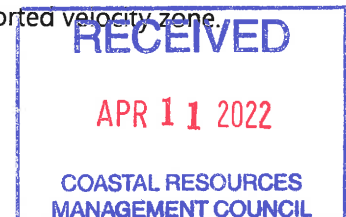
3.4.2 Surface Waters

The Seekonk River Subbasin (Waterbody ID No. RI0007019E-01) is listed in RIDEM's Environmental Resource Map as having impairments for fecal coliform, dissolved oxygen, and total nitrogen. The mapping tool further indicates that stormwater impairments have not been confirmed, but that potential stormwater impairments may exist, and identifies that the Seekonk River is assigned Impairment Category 5, meaning that the waterbody is impaired or threatened for one or more uses and requires the development of total maximum daily loads (TMDLs) for those constituents causing the impairment.

The RI Water Quality Regulations at 250 RICR 150-05-01 list the Seekonk River Subbasin as having water quality classification SB1{a}. The State of Rhode Island 2018 – 2020 Impaired Waters Report, dated February 2021, summarizes designated uses for surface waters as described in the RI Water Quality Regulations and 305(b) Assessments. The SB1{a} classification is considered suitable for primary and secondary contact recreation, fish and wildlife habitat, and fish consumption. Drinking water supply and shellfish consumption are not suitable uses. Future compliance with the US Environmental Protection Agency (USEPA) Consent Decree for Combined Sewer Overflow abatement in the Providence area, in combination with water treatment facility upgrades and TMDL implementation on tributaries to the Seekonk River, are anticipated to facilitate water quality improvements that will be sufficient to negate the need to assign Seekonk River TMDLs.

3.4.3 Special Flood Hazard Area Zones

The Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) No. 44007C0309K, depicts coastal velocity special flood hazard area (SFHA) zones for both sides of the Seekonk River (see **Figure 5 in Appendix A**). The open waters and shoreline in East Providence, are mapped as being associated with a coastal velocity SFHA zone (Zone VE) with a base flood elevation (BFE) of 12 feet above the North American Vertical Datum of 1988 (NAVD 88). The velocity zone extends east overland approximately to Waterfront Drive where the proposed Waterfront Drive Off-Ramp will meet Waterfront Drive. North of this area the velocity zone follows the shoreline along the embankments of the former rail line beds to the Crook Point Bascule Bridge. Approximately 700 feet north of this bridge, Zone VE (BFE 12) transitions to Zone AE (BFE 12) with no reported velocity zone.



In Providence, the open waters and shoreline are mapped as being associated with Zone VE (BFE 13) for the entire north/south length of the Project, parallel with the shoreline. The most northern portion of the proposed Gano Street and Blackstone River Bikeway Relocation will occur within the velocity zone, but the limits of remaining southerly portions of both Relocations will remain just above the mapped velocity zone.

3.4.4 Soils

The Natural Resources Conservation Service (NRCS) web soil survey identifies two soil map units within Project limits. The Project Areas in East Providence are mapped as Udorthents-Urban land complex (UD). On the Providence side, most of the Project Area is mapped as UD, with the exception of a map unit of Fortress sand, 0 to 3 percent slopes (FtA), extending south from Gano Park to include the Gano Street Off-Ramp from I-195 westbound (see **Figure 6 in Appendix A**).

The UD complex is composed of two named components – Udorthents and Urban Land. Udorthents typically are moderately well to excessively drained and have been disturbed by grading, cutting, or filling, such that the natural soil forming processes have been obscured, or destroyed. Urban land is a miscellaneous non-soil area typically consisting of building rooftops or pavement. The FtA soil unit is a consociation with one named component. Similar to Udorthents, the Fortress sand is a human transported material, in this case consisting of sandy dredge spoils disposed of on land. The series is described as moderately well drained, meaning the soil may be saturated within two feet of the surface during parts of the growing season.

Soils (and groundwater) underlying much of the Project Area have a history of contamination well known to RIDEM's Office of LRSMM. Appropriate consultation and permitting with RIDEM regarding soil and groundwater management will be implemented, as previously described in Sections 2.2.2 and 2.2.2.4 above.

3.4.5 Groundwater

The RI Groundwater Quality Rules at 250-RICR-150-05-03 and RIDEM Environmental Resource Map identify groundwater underlying the Project Areas in East Providence and Providence, as Groundwater Classification GB. The GB designation indicates that groundwater "may not be suitable for public or private drinking water use without treatment due to known or presumed degradation."

3.4.6 CRMC-Regulated Shoreline Features

All shoreline features and lands within 200 feet of the inland edge of the shoreline features are regulated by CRMC. Several different feature types are present within, and adjacent to the Project limits. The features generally lack continuity due to the developed nature of the Project Area. Active uses, remnants of past uses, and artificial shoreline stabilization structures characterize the entire lengths of shoreline

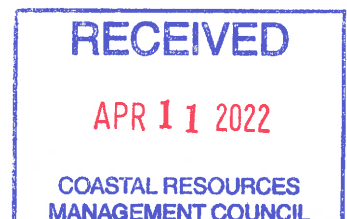
within the Project Area in East Providence and Providence. Naturalized features that have had an opportunity to revegetate were field delineated on the East Providence side by Applied Bio-Systems, Inc. (ABS) on February 24, 2022. Those on the Providence side, north of the Washington Bridge, were field delineated by AECOM on December 15, 2019, presumably for preparation of the CE. Man-made features were not field delineated but instead have been depicted on the Project plans based on topographic mapping ground-truthed by biologist field review. Description of the field methodology and the coastal features delineated are provided in a report prepared by ABS in **Appendix M**. Supplemental photographs of coastal features taken at low tides are presented in **Appendix N**.

3.4.6.1 Manmade Shorelines (CRMP § 1.2.2.F) and Other Artificial Features

Man-made influences upon the shorelines are present within Project limits on both sides of the Seekonk River in the form of seawalls, stone revetments, and steeply sloped vegetated earthen embankments.⁷ Shoreline segments under the Washington Bridge on the Providence side comprise massive concrete pier foundations, concrete pier walls, and retaining walls, with one narrow section of rip rap (see photographs on pages 4 and 5 of **Appendix N**). VHB biologists made field visits at low tide in February and March 2022 and estimated that the top of the foundations and retaining walls were between 9 and ten feet above the intertidal substrates beneath the bridge. The edge of the coastal feature was presumed to be the top of the seaward face of these structures. However, large rip rap slopes providing slope protection under the Bridge abutted the concrete structures and extend upslope to the Blackstone River Bikeway for the entirety of the Bridge's width. ABS indicated in the mapping that accompanies their report that the coastal feature is the seaward face of the concrete structures under the Bridge but indicated verbally that the rip rap slope protection could potentially be considered part of the Manmade Shoreline. The artificial shoreline along the Marston Boat House property, south of the Washington Bridge, and abutting the protected shoreline under the Bridge, consists of sloped stone revetments and vertical stone retaining walls, which are continuations of those present under the Bridge. The vertical walls transitioned to unvegetated, coarse rip rap armor on the seaward side of the Boathouse structure. The steep, earthen embankments supporting the Gano Street Off-Ramp north of the Bridge are protected from wave action with intricately placed stone blocks laid flat against the embankment surface, providing continuous armor within and above the intertidal zone. On the East Providence side, the active commercial yard (Moran Environmental Recovery) exhibited a continuous shoreline armored with unvegetated coarse rip rap.

The coastal feature edge for the sections of man-made shoreline described above is presumed to be the seaward face of retaining walls and foundations and the top of embankments formed by rip-rap armor and revetments. Salt marsh fringes were not observed along these artificially stabilized shorelines. The 200-foot Contiguous Area

⁷ "embankments" is used in this narrative to indicate man-made landforms.



from these features envelops developed land, including paved and other impervious surfaces, the barren areas under the Washington Bridge, grassed road shoulders, maintained public lawn, and the grounds of private facilities.

3.4.6.2 Coastal Embankment

Although not seemingly meeting the definition of coastal headlands, bluffs, or cliffs, provided in CRMP § 1.2.2.D, the artificial embankments rising above the East Providence shoreline at the Crook Point Bascule Bridge approaches are functionally similar to coastal bluffs. The landforms presumably constructed as the rail grade approaches to the bridge rise steeply above the shore. The northern rail approach, proximate to the proposed Valley Street Connector, is described herein. During field visits by a VHB biologist in February and March 2022, the embankment was estimated to rise approximately 15 feet above mean high tide. Its steep seaward slope face is forested, with black oak (*Quercus velutina*) the dominant canopy species. As the embankment transitions into abutting mainland, the slope gradient decreases and other species enter the canopy, including bigtooth aspen (*Populus grandidentata*), black cherry (*Prunus serotina*), gray birch (*Betula populifolia*), and crabapple (*Malus spp.*). The shoreline abutting the rail line embankment transitions directly into the intertidal zone, while the shoreline abutting the "mainland" to the north consists of vertical faces and undercut banks eroded by wave energy (see photographs on page 3 of Appendix N). The intertidal zone along the shoreline is a uniform rust-colored, "pebbly" substrate. Fringe saltmarsh is absent, but hightide bush, or marsh elder, (*Iva frutescens*) was observed sporadically against the scoured banks.

The top of coastal embankment was field delineated by ABS as Flag Line CF (300-312) relative to the proposed construction of the Valley Street Connector and proposed detention pond maintenance activities. The 200-foot Contiguous Area comprised a band of forest along and closest to the coastal feature that was abutted on the landward side by a semi-maintained "weedy" field extending to Waterfront Drive. Plant species observed in this field include mullein (*Verbascum thapsus*), knapweed (*Centaurea spp.*), mugwort (*Artemisia vulgaris*), and Japanese knotweed (*Fallopia japonica*), as well as seedling sumac (c.f. *Rhus glabra*). The detention pond in this field is enclosed by chain link fence. The outermost limits of the 200-foot Contiguous Area do not extend to the Waterfront Drive pavement and is seaward of the proposed roadwork for the Valley Street Connector.

In East Providence south of the Washington Bridge is a narrow coastal cove, or inlet, characterized by steep to nearly vertical, eroded and undercut embankments that create a "ravine-like" appearance (see photographs on page 1 of Appendix N). This coastal inlet is situated between two parking lots, and the top of the embankment is lined with a treed fringe dominated by Sycamore maple (*Acer pseudoplatanus*). Its inland, eastern most end contains a piped stormwater outfall and similarly abuts a parking area. The top of the inlet's embankment was field delineated by ABS as Flag Line CF (100-116) and used to establish the limits of the 200-foot Contiguous Area for work activities proposed at the intersection of Warren Avenue and Valley Street.

The closest proposed work activity to the shoreline feature associated with the coastal inlet will be ±234 feet. No work is proposed within the 200-foot Contiguous Area.

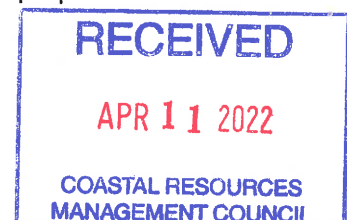
On the Providence side of the Seekonk River, coastal bank is present north of the Washington Bridge, between the Bridge abutment and the armored embankment of the Gano Street Off-Ramp. The feature is characterized by a steep eroded face, and the shoreline feature is believed to be the crest of the eroded bank. Landward of the feature, the topography levels to a shelf that provides an access route for bridge maintenance before it again slopes upward to the Blackstone River Bikeway. The coastal feature north of the Bridge was field delineated by AECOM as Flag Line Bank (1-1 through 1-11). North of the flag line, the coastal feature edge was approximated by VHB based on mapped topography and aerial imagery so that the 200-foot Contiguous Area could be depicted relative to proposed work activities at the water quality ponds. Here the 200-foot Contiguous Area consists of the Gano Street Off-Ramp, Gano Street proper, the water quality ponds, grassed cover, portions of the Blackstone River Bikeway, and barren areas inland of the Bikeway.

3.4.6.3 Coastal Wetland (CRMP § 1.2.2.C)

North of the Moran Environmental Recovery facility in East Providence, near a radio tower, a low saltmarsh fringe has established on sands bordering the eroded face of the adjacent uplands (see photographs on page 2 of **Appendix N**). High marsh is absent in this area, and the steeply eroded face was estimated to be three to four feet in elevation. Saltmarsh species observed included: hightide bush (or marsh elder), saltmarsh cordgrass (*Spartina alterniflora*), and sea lavender (*Limonium carolinianum*). Woody species observed along the face of abutting uplands included Tree of Heaven (*Ailanthus altissima*), black cherry, crabapple, Tartarian honeysuckle (*Lonicera tatarica*), multiflora rose (*Rosa multiflora*), Asiatic bittersweet (*Celastrus orbiculata*), and poison ivy (*Toxicodendron radicans*). This is the only saltmarsh observed proximate to the Project Area. The shoreline feature is the top of the eroded bank face and was delineated by ABS as Flag Line CF (200-210). The delineation was conducted to determine the limits of the 200-foot Contiguous Area relative to proposed work in Waterfront Drive for the Waterfront Drive Off-Ramp.

3.4.7 RIDEM-Regulated Freshwater Wetland

A freshwater pond with a narrow freshwater wetland fringe is present in East Providence between Waterfront Drive and the two former rail line approaches to the Crook Point Bascule Bridge. The freshwater wetland does not have a surface hydrologic connection to coastal wetlands or waters, and no record of a pipe connection is known to exist. Based on the CRMC/RIDEM Freshwater Wetlands Jurisdiction Map (**Figure 3** in **Appendix A**), the wetland is within the jurisdiction of RIDEM, however, the CRMC has taken jurisdiction of the entire Project. As a pond, this wetland merits a 50-foot Perimeter Wetland. The northeastern portion of the pond was not field delineated by ABS due to its distance from proposed work



activities – associated with construction of the Valley Street Connector. The closest Project activity to the pond is estimated to be ±280 feet.

3.4.8 Rare, Threatened, and Endangered Species

As indicated in Section 2.2.2.3 above, RIDEM's Environmental Resource Map shows that a Natural Heritage polygon extends into the southwest corner of the Project Area at India Point Park (Figure 7 of Appendix A). Consultation with RIDEM revealed that the polygon is associated with salt reedgrass, which is listed as a State Species of Concern (according to the 2015 Rhode Island Wildlife Action Plan). This species evidently is adapted primarily to mineral soils in salt marshes and typically occupies brackish marshes, as well as the upper margins of salt marshes (USDA NRCS Plant Fact Sheet, September 2005). The plant evidently has been found at Bold Point Park, located well southerly of Project limits, on the opposite (East Providence) banks of the Seekonk River. Shoreline characteristics within Project limits associated with the polygon appear incapable of supporting a saltmarsh fringe due to manmade features and, in some areas, an absence of an exposed intertidal zone. Project activities proposed within the mapped polygon include road work proper within existing highway limits and a portion of the Gano Street and Bikeway Relocation. All proposed work will remain upland of coastal marshes, and all stormwater runoff generated by the Project during construction and under post-project conditions will be treated in accordance with applicable USEPA, CRMC, and RIDEM standards and regulations, such that no direct or indirect effect to salt reedgrass habitat is anticipated.

A Natural Heritage polygon mapped well to the north of the proposed Valley Street Connector on the East Providence side of the Seekonk River is reported to represent an occurrence of sundial lupine (*Lupinus perennis* ssp. *perennis*), which is listed as a State Species of Concern (according to the 2015 Rhode Island Wildlife Action Plan). Based on the polygon mapping, proposed Project activities will remain well south of the polygon, and the closest activities will occur high on the elevated landform along Waterfront Drive within areas that are either maintained or which currently exist as impervious surface.



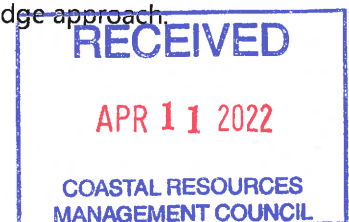
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Proposed Project Activities and Associated Environmental Consequences

The Project limits are described in Section 3.1 above and are illustrated graphically in Figure 2 of Appendix A. The Project components discussed below will occur in work areas over coastal waters or where portions of terrestrial work will occur within or proximate to the 200-foot Contiguous Area. Proposed work activities within the I-195 ROW will extend a significant distance to the east and west of the Washington Bridge, away from coastal features and not near freshwater wetlands. Work proposed in the I-195 corridor between the Washington Bridge and South Main Street in Providence will remain outside of CRMC's 200-foot Contiguous Area, as measured from coastal shoreline features southerly of I-195 in India Point Park and from the Providence River segment westerly of Water Street, at the I-Way Bridge. Work on I-195 not specifically noted in the following subsections include roadway maintenance, milling and overlay, restriping, and signage improvements within the confines of the existing ROW, and largely within the confines of existing pavement, with no increase in pavement area.

4.1 Bridge Deck and Gano Street Off-Ramp

As previously described in Section 2, initial limited repairs to the Washington Bridge deck and elevated sections of the Gano Street Off-Ramp were approved under the Maintenance Certification Assent, issued by CRMC on January 27, 2022. The approved work includes removal of bridge deck pavement to enable deck repair on the Washington Bridge, removal of bridge deck concrete at bridge joint locations for joint elimination and joint repair/replacement on the Washington Bridge and Gano Street Off-Ramp, concrete bridge barrier replacement, and bridge deck and superstructure concrete repairs on the Washington Bridge and Gano Street Off-Ramp. Work on the Gano Street Off-Ramp bridge terminates where the elevated section of the ramp meets the earthen embankment of the bridge approach.



Work not covered by the Maintenance Assent will include widening of the bridge deck from Spans 1 through 4 to accommodate a fifth, continuous through lane. The purpose of this through lane is to improve traffic flow and reduce congestion. The BTC proposed new piers and foundation work in the Seekonk River to accommodate this partial widening, but the current design that incorporates ATCs avoids all in-water work. Support piers will still be required for the widening, but they will be constructed as an infilling of three existing decorative hollow columns on the outside of the existing Bridge spans. The columns currently sit on elevated concrete foundations on land and will be filled with structural concrete, such that minimal ground contact is required. A fourth support will be installed as a new free-standing pier requiring a deep foundation to be constructed in the grassed area west of Gano Street, between the existing on-ramp and the westernmost end of Washington Bridge Span 1. This structure will be outside of the 200-foot Contiguous Area.

The use of temporary, spudded work barges will be required in the Seekonk River to accomplish work on the bridge superstructure. These barges represent the only water contact associated with the Project. Work plans and schedules will be provided to the USCG and local Harbormaster through the duration of barge use. TOY Restrictions and noise mitigation measures to protect vertebrate marine life will not be required for the Project, as indicated under Sections 2.3.4.2 and 2.3.5 above. Debris capture and collection measures are documented in the CRMC Maintenance Assent and will be implemented for the Washington Bridge and the aerial section of the Gano Street Off-Ramp to prevent debris from falling into the Seekonk River. These include debris capture/collection overhang brackets and debris capture/collection link slab shielding (**Appendix O**).

All stormwater generated by the proposed increase in impervious surface area associated with the Washington Bridge deck widening will be directed to the existing Gano Street water quality ponds, which function as a three-compartment STU, and provide treatment that complies with the Stormwater Rules (see Stormwater Report for details). Catch basins and scuppers on the deck sections are currently, and will continue to be, protected with appropriate inlet protection measures for the purposes of not only stormwater runoff filtration but for concrete debris and particulate capture. A RIDOT Small-Site SWPPP, dated November 1, 2021 was prepared to address good housekeeping measures for the work covered by the Maintenance Assent, and a RIDOT Large-Site SWPPP has been prepared for all work proposed in this Category B Application (separately bound and referenced as **Appendix S**). Adverse effects to tidal waters, shoreline features, and the 200-foot Contiguous Area are not anticipated, given that work in tidal waters and wetlands is not proposed – coupled with the implementation of long-term stormwater management provisions and measures to minimize indirect construction impacts, such as measures to capture errant debris and the installation of inlet protection on the bridge and approaches.

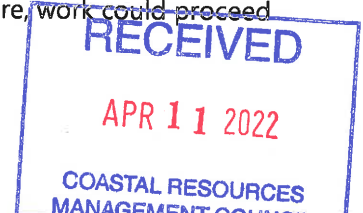
4.2 Waterfront Drive Off-Ramp

The proposed I-195 Off-Ramp to Waterfront Drive will provide an important link to commercial and residential properties along the Seekonk River and enhance public access to the shoreline south of the Washington Bridge (e.g., Bold Point Park as shown in **Figure 2A of Appendix A**), where no direct access from the highway currently exists. At present, the closest exit is at Broadway, ± 0.8 mile to the east. Components of the off-ramp include:

- › Construction of the off-ramp.
- › Construction of a bridge to carry traffic from the Taunton Avenue and Veterans Memorial Parkway on-ramps over the new off-ramp to Waterfront Drive (to become RIDOT Bridge No. 126701).
- › Vertical reconfiguration of the Veterans Memorial Highway/Taunton Avenue On-Ramp.
- › Construction of the intersection at Waterfront Drive.
- › A temporary on-ramp system to re-route traffic from the Taunton Avenue and Veterans Memorial Parkway On-Ramps to eliminate detours and maintain traffic flow during the construction of Bridge No. 126701.
- › Removal of Valley Street from Taunton Avenue southerly to Warren Avenue.
- › Construction of an STU to treat stormwater runoff from the ramps, Taunton Avenue, and contributing neighborhood areas.

Work required to remove the southern end of Valley Street and to restore the area to grassed cover to match the existing park setting will occur ± 230 feet from the field delineated edge of the coastal inlet described in Section 3.4.6.2, just out of the 200-foot Contiguous Area. Work associated with the northernmost intersection work at Waterfront Drive will occur within the 200-foot Contiguous Area. Guardrail replacement on the westerly side of Waterfront Drive is proposed to occur within ± 150 feet of the field delineated edge of the coastal wetland described in Section 3.4.6.3 above, and the pavement match line is proposed to be positioned ± 150 feet from the same coastal wetland edge. Activities within the 200-foot Contiguous Area will comprise shoulder brush cutting (a maintenance activity to prepare for the installation of perimeter sediment controls and new guardrail), perimeter control installation, guardrail installation, roadway sawcutting, curbing installation, paving, and shoulder loam and seeding. Pavement replacement work proposed within the 200-foot Contiguous Area will result in no change in the existing curb line. Adverse effects to the 200-foot Contiguous Area are not anticipated, given the lack of appreciable earthwork and no change in pavement footprint.

As introduced in Section 2, some of the work identified in the bullets above will begin in Spring 2022. The work is well landward of CRMC contiguous area, and it was agreed at the October 13, 2021, pre-application meeting that these activities could proceed without the CRMC Assent. Importantly, however, it was emphasized that RIPDES CGP thresholds must be adhered to, and any needed interim RIPDES CGP authorization must be obtained from RIDEM. Furthermore, work could proceed



only with the proper erosion and sedimentation controls and any needed interim stormwater management measures installed prior to the start of each construction area. In recognition that portions of the Waterfront Drive intersection work would occur within the 200-foot Contiguous Area, it was agreed that work at the intersection, would not begin until the Category B Coastal Assent has been issued.

The Waterfront Drive Off-Ramp work will result in a significant net decrease in impervious surface coverage due to the removal of impervious surface at the southern end of Valley Street (see Stormwater Management Plan for specific areas). Some of the removed impervious surface area is under the Washington Bridge, shielded from precipitation and consequent runoff, but all Project generated stormwater will be managed and treated in compliance with the Stormwater Rules. The Valley Street pavement area to be removed will be appropriately graded and replaced with loam and seed, and then maintained as part of the existing park-like setting.

Stormwater generated from the proposed Off-Ramp and existing and reconfigured portions of Taunton Avenue and Valley Street will be directed to an STU that will be constructed in a trapezoidal-shaped area at the southeastern quadrant of the Waterfront Drive and off-ramp intersection. RIDOT will acquire 19,532 sf of new ROW to construct this STU (see Section 1.2 above and takings map in Appendix C). The STU will have a sediment forebay and will be lined due to known soil contamination. Its outlet pipe will tie into an existing drainage line to avoid creating a new point source discharge and easements or additional ROW. The basin floor and side slopes will be seeded with a RIDOT native seed mix, comprising switch grass (*Panicum virgatum*), little bluestem (*Schizachyrium scoparium*), perennial rye (*Lolium perenne*), and hard fescue (*Festuca* spp.), in recognition that the basin floor will be under drained above the liner and that prolonged media saturation is not anticipated.

The RIDOT Small-Site SWPPP referenced in the preceding section will apply to the initial soils disturbances for the advanced on-ramp work totaling less than one acre. The SWPPP focuses on good housekeeping measures, proper maintenance and inspection of erosion and sedimentation controls, and spill reporting requirements. The Large-Site SWPPP accompanying this Category B Assent application will be implemented for the remaining work on the off-ramp (Appendix S). Excavation activities for the Waterfront Drive Off-Ramp, north of I-195, are subject to monitoring in accordance with the Section 106 Programmatic Agreement due to historic period archaeological sensitivity characterized as moderate to high.

4.3 Valley Street Connector

Due to the configuration of the proposed Waterfront Drive off-ramp and the vertical reconfiguration of the Veterans Memorial Highway/Taunton Avenue On-Ramp, the existing Valley Street to connection to Warren Avenue south of the I-195 overpass will be eliminated. RIDOT proposes to replace this linkage with the construction of a new connection near the northern end of Valley Street. The Connector will be

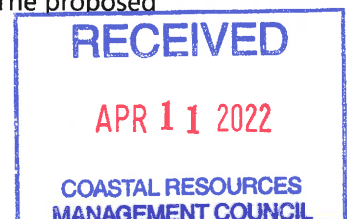
constructed on a vacant parcel characterized by remnant impervious surfaces. A 20,740-sf taking by the State, as indicated in Section 1.2 above and illustrated in **Appendix C**, will be required to construct the ±105-foot-long road segment.

Construction of the Valley Street Connector will create ±3,090 sf of new roadway pavement area, but much of the area to be paved consists of remnant slabs of impervious bituminous surface (see photographs on page 10 of **Appendix N**). Stormwater runoff generated by the new road surface will be directed to an existing detention pond on State land west of Waterfront Drive, northwest of the subject parcel. The detention pond, described in Sections 2.2.1.2 and 3.4.6.2 above, will undergo maintenance activities to ensure adequate storage for the increased stormwater contribution. The existing pond side slopes support heavy vegetative growth. Maintenance activities will consist of removing saplings and stumps established in lower elevations of the basin and rip-rap energy dissipator pads. Clearing and tree removal will occur from the bottom of the pond side slope upslope to the outlet elevation of the stone overflow weir. Shrubs were absent on the slope, so clearing/cutting will primarily involve the removal of Japanese knotweed. Tree species to be removed include sapling black cherry and cottonwood (*Populus deltoides*). The stormwater Management Plan and Operation and Maintenance Plan prepared for the Project address this detention pond and are bound separately as **Appendices Q** and **R**.

The closest point of the detention pond's perimeter chain link fence to the delineated coastal feature edge is ±140 feet, such that the pond is within the 200-foot Contiguous Area. The closest point of the proposed roadway construction to the coastal feature edge is ±310 feet, so no new impervious surface is proposed within the 200-foot Contiguous Area. Temporary construction access to the detention pond will be required through the weedy field, but no preparation of the ground surface will be required. This proposed activity is similar to the routine pond maintenance or period mowing by tractors in the surrounding field. All work associated with detention pond maintenance will occur within a topographic depression, such that erosion or sediment migration towards the coastal feature is not anticipated.

4.4 Gano Street On-Ramp and Relocation of Gano Street and the Blackstone River Bikeway

The existing Gano Street and Blackstone River Bikeway alignments are proposed to be shifted to accommodate the realigned Gano Street On-Ramp to I-195 Westbound (the Relocation). Gano Street and the Bikeway currently pass under Washington Bridge Span 1 but will be relocated east (seaward) to pass through Span 3 proximate to the manmade coastal shoreline. This Relocation will enable the new Gano Street On-Ramp to provide additional ramp length for safe acceleration onto the I-195 mainline and improvements to the merge lane onto I-195. The existing On-Ramp is insufficient in length and requires rapid acceleration over a short distance to permit motorists to merge with westbound traffic. The proposed



Relocation will return Gano Street to its former location prior to circa 2006 (see **Figures 8A – 8D in Appendix A**).

The northern extent of the Gano Street Relocation work will occur at the Wickenden Street intersection, and the southern extent will end just north of the Hunter S. Marston Boathouse driveway. Access to existing commercial entities present off Tockwotton Street, between India Point Park and I-195, will be maintained via the same driveway alignment currently provided opposite the India Street terminus, and the southernmost portion of Gano Street between the driveway and Tockwotton will be retained. Pedestrian access to India Point Park currently provided by the current Gano Street sidewalks will be maintained via a new bridge to be constructed as part of the Gano Street On-Ramp (to become RIDOT Bridge No. 126601). The bridge will allow for a replacement sidewalk to be constructed, providing continued passage for pedestrians and the retention of existing utilities. Other work activities associated with the Gano Street Relocation will include construction of four accessible wheelchair ramps at Gano Street's intersection with Trenton Street and the Gano Street Off-Ramp. Proposed maintenance activities at the three existing water quality ponds in the infield of Gano Street and the Gano Street Off-Ramp are discussed further below.

The relocation involves an eastward curvature of Gano Street and the Bikeway, such that the closest seaward work will occur near the midpoint between the I-195 Eastbound and Westbound Washington Bridges (Bridge Nos. 200 and 700, respectively). At this point, the eastern edge of the proposed relocation will extend seaward of the existing Bikeway and its associated split-rail fence. To the northeast, the relocation will move the existing Bikeway further away from the shore and convert removed pavement to grass cover.

At its easternmost point of curvature under the Washington Bridge, part of the relocated road and Bikeway will be built over the unvegetated rip rap slope that currently extends from the top of the concrete structures to the Bikeway's split rail fence. Manmade Shoreline (CRMP § 1.2.2(F)) is the shoreline feature under the entirety of the Bridge (Refer to description in Section 3.4.6.1 and photographs on page 4 of **Appendix N**). This shoreline feature determination has been consistent in work products prepared by VHB, AECOM, and ABS. The closest permanent work activity will be the installation of a proposed modular block retaining wall to support the relocation. The seaward face of the proposed retaining wall will be within the 50-foot Setback of the shoreline feature. Accordingly, a variance is respectfully being requested by the Applicant, as addressed in Section 5.4 below. As introduced in Section 3.4.6.1 above, ABS has indicated that the rip-rap slope where the new retaining wall is proposed to be constructed could potentially be interpreted as part of the Manmade Shoreline, so Section 5 below incorporates language that addresses work on the shoreline feature if CRMC should agree with this interpretation.

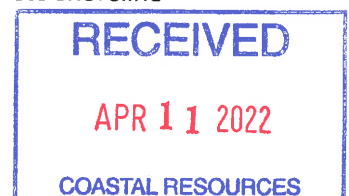
Where the Relocation extends south beyond the Washington Bridge, its seaward edge will mostly displace existing grass cover and will remain landward of an elevated landform, such that runoff from newly created slopes will not have the

opportunity to drain onto the Hunter S. Marston Boathouse property (see photographs on page 9 of **Appendix N**). Where the Relocation will extend north beyond the Washington Bridge, it will veer sharply away from the shoreline to match the existing Gano Street alignment. North and south of the Washington Bridge, side slopes will be graded to 3:1 or less and loamed and seeded for future grass cover to blend with existing, maintained lawn. Perimeter sediment controls will be installed to prevent sediment transport beyond Project limits shown on the site plans. Under the Washington Bridge, portions of the rip rap slope that will be temporarily disturbed for installation of the modular block wall will be re-stabilized with coarse rip rap to match the existing rip rap slope protection. The area subject to Gano Street removal, where outside the limits of the Washington Bridge and the proposed new On-Ramp and sidewalk, will be regraded, loamed, and seeded. Under the Washington Bridge and proposed On-Ramp bridge, the former Gano Street footprint will be treated with gravel and crushed stone on either side of the proposed sidewalk.

The Relocation work will result in a net increase in impervious surface (see the Stormwater Management Plan in **Appendix Q** for area calculations). Stormwater runoff to be generated by the new Gano Street On-Ramp and relocated Gano Street pavement surface will be tied into the existing Gano Street drainage collection system and directed to the existing water quality ponds, where it will be routed through the treatment system and discharged via the existing 24-inch HDPE outlet pipe. The treatment system consists of three distinct water quality ponds designed as a sedimentation basin, storage pond, and micropool. Each is lined and was planted with native emergent species with peripheral trees, shrubs, grasses, and forbs. The ponds accommodate stormwater from Gano Street under existing conditions and have been calculated to contain sufficient volume to accommodate the new impervious surfaces associated with the Relocation (see Stormwater Management Plan in **Appendix Q**).

As part of the Project, the sedimentation basin (uppermost pond) will be cleaned of accumulated sediment down to its concrete bottom, and the stone weir located between the storage pond and micropool will be reshaped with the addition of selectively placed rip rap. During multiple VHB site visits in February and March 2022, the sedimentation basin was observed to contain a significant volume of road sands and finer sediment (see photographs on pages 7 and 8 of **Appendix N**). Portions of the accumulation overlying the concrete liner were observed to be at least 44 inches thick, as determined using a hand-held soil auger. Long-term maintenance of the water quality ponds is identified in the Operation and Management Plan (**Appendix R**), and the RIDOT Large-Site SWPPP (**Appendix S**) prepared for the Project includes work on the water quality ponds and the entire Relocation area.

Most of the Relocation Area and the lower half of the water quality pond system are within the 200-foot Contiguous Area. The Relocation is consistent with the uses in the area and returns the Gano Street back to its approximate former pre-2006 alignment. The former roadbed is visible under Washington Bridge Span 3 in aerial imagery through 2018. No work is proposed on the existing concrete shoreline



structures, work will occur within open unforested locations, all areas exposed as part of the Project will be fully stabilized in permanent cover, new point source discharges to coastal features have been avoided, and all stormwater runoff associated with the Relocation will be managed and treated in accordance with the Stormwater Rules.

Relative to Section 106 of the Historic Preservation Act of 1966 and Section 4(f) of the USDOT Act of 1966, no encroachment onto the Hunter S. Marston Boathouse property will occur, as indicated in Sections 2.3.2 and 2.3.3 above. The land area associated with portions of the proposed Gano Street On-Ramp, within the area located west of the current Gano Street alignment, is identified as an area of moderate historic period archaeological sensitivity and will be subject to monitoring during excavation activities, in accordance with the executed Programmatic Agreement (**Appendix H**).



5

CRMC Regulatory Compliance

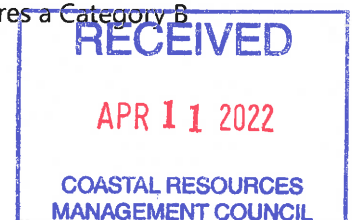
The CRMP requires that the Applicant provide sufficient technical information about the Project for CRMC to render a permitting decision. The Project is subject to the CRMP and additionally falls under the purview of the Metro Bay and Shoreline Change (Beach) SAMPs.

The following applicable sections of the CRMP are addressed below as part of this Category B application: Sections 1.1.5, 1.1.6(F), 1.1.6(I), 1.1.7, 1.1.8, 1.1.9, 1.1.10, 1.1.11, 1.1.12, 1.2.1(E), 1.2.1(G), 1.2.2(C), 1.2.2(F), 1.2.3, 1.3.1(A), 1.3.1(B), 1.3.1(F), 1.3.1(J), 1.3.1(M), 1.3.5, and 1.3.6.

5.1 CRMP § 1.1.5 – Review Categories and Prohibited Activities in Tidal Waters and on Adjacent Shoreline Features

According to the Activity Matrix for Type 4 Waters in Table 1, under CRMP Section 1.1.5.A, the construction of public roads (i.e., the proposed Gano Street Relocation) requires the filing of a Category B application when associated with Manmade Shorelines. ABS has indicated that the stone rip rap slope protection upslope of the Manmade Shoreline under the Washington Bridge could potentially be considered part of the Manmade Shoreline feature. The Gano Street and Bikeway Relocation is proposed to extend easterly onto upper portions of the slope, such that the Project could propose filling, removal, and grading of Manmade Shoreline if CRMC permitting staff determine that the inland edge of the coastal feature is not the seaward face of the massive concrete shoreline structures. Table 1 for Type 4 Waters indicates that the filling, removal, and grading related to the Relocation activity could potentially be approved as a Category A activity.

Table 2 identifies that construction of public roads (i.e. the Gano Street Relocation) within the 200' Contiguous Area to Manmade Shorelines requires a Category B



Application. Therefore, the Applicant is filing this Category B application for the proposed work associated with the Gano Street Relocation but is additionally including all Project elements described in Section 4 above, consistent with discussions held at the October 13, 2021, pre-application meeting. Notably, with respect to the activity matrices in Table 1, no filling in tidal waters and no new point source discharges are proposed Project wide.

5.2 CRMP § 1.1.6(F) – Category B Applications

*Applicants for activities and alterations listed as "B" in Tables 1, 2, or 3 in § 1.1.5 of this Part, in addition to adhering to the applicable policies, prerequisites, and standards, are required to address all Category B requirements as listed in applicable sections of the program and, where appropriate, other issues identified by the Council.**

In accordance with CRMC § 1.1.6(F)(1), it fully is the Applicant's intention to demonstrate adherence to the applicable CRMC policies, prerequisites, and standards, or identify thoroughly why such standards cannot be met, and to adequately address all applicable Category B requirements listed in the CRMP.

* Italicized text henceforth in Section 5 of this document indicates text excerpted from the CRMP.

5.3 CRMP § 1.1.6(I) – Coastal Hazard Analysis Applications

As indicated in Section 2.2.1.2 above, a coastal hazards analysis has been completed for the project in recognition of proposed construction of a public road (CRMP 1.3.1(M)). The Coastal Hazard Application Worksheet and a memorandum with supporting mapping are provided in **Appendix F**, and summary findings are outlined in Section 5.7 below.

5.4 CRMP § 1.1.7 – Variances

The Applicant respectfully requests a variance from the Setback standard under CRMP § 1.1.9(E). Although easternmost portions the Gano Street and Bikeway Relocation will project onto upper portions of a rip rap slope that could potentially be considered part of the adjoining Manmade Shoreline, the need to request relief from the setback standard is presumed, and the six criteria below have been completed in the event a variance from CRMP § 1.1.9 should be required. Incidentally, standards and prohibitions are not listed for Manmade Shoreline, such that proposed work on the stone rip-rap slope that forms the upper portion of the Manmade feature evidently does not require relief from either.

1. The proposed alteration conforms with applicable goals and policies of the Coastal Resources Management Program.

The proposed Gano Street and Bikeway Relocation is proposed by the Applicant for public benefit to increase motorist safety. The character of the Relocation and materials to be used are physically and aesthetically consistent with the existing shoreline features and character of the specific area. All stormwater generated by the Relocation will be properly managed and treated in conformance with the RI Stormwater Rules at 250-RICR-150-10-8 and in compliance with CRMC § 1.3.1(F). The existing Blackstone River Bikeway will be reconstructed to continue providing shared use recreational and shoreline access opportunities, as well as seaward views of the shoreline and Seekonk River.

2. The proposed alteration will not result in significant adverse environmental impacts or use conflicts, including but not limited to, taking into account cumulative impacts.

The proposed encroachment towards the shoreline feature will occur in an area that is largely beneath the bridge footprint on barren stone rip rap. Within the setback area under the bridge, the Relocation will occur within the existing paved Bikeway surface and on barren, compacted earth and crushed stone. Where the Relocation extends north or south of the Bridge and unvegetated substrates, it will either extend further landward than existing Bikeway limits (north of the Bridge) or be located within maintained grass areas (south of the Bridge). The cumulative area of rip rap slope to be displaced will be approximately 2,500 square feet. Environmental consequences for any subject matter within the setback are not anticipated.

3. Due to conditions at the site in question, the applicable standard(s) cannot be met.

To gain the maximum benefit for acceleration length on the proposed Gano Street On-Ramp, Bridge Span 3 was selected as the proper position for Gano Street, where the street was located previously prior to circa 2006. Due to the position of the span and its overhead clearances, the street position needs to be constructed where shown on the Project plans (see photographs on page 9 of **Appendix N** and Project plans referenced as **Appendix P**). Although the Bikeway adds to the lateral encroachment on the shoreline feature and within the setback, it was determined that it needed to remain on the seaward side of Gano Street to avoid crossing traffic and to maintain the recreational and aesthetic experience for users.

4. The modification requested by the applicant is the minimum variance to the applicable standard(s) necessary to allow a reasonable alteration or use of the site.

Similar to the response in 3, above, particularly concerning overhead clearances and Bikeway positioning, and based on the experience of the professional structural and highway design engineers responsible for developing the Relocation design, the modification requested is believed to represent the minimum needed.

5. The requested variance to the applicable standard(s) is not due to any prior action of the applicant or the applicant's predecessors in title. With respect to subdivisions, the Council will consider the factors as set forth in § 1.1.7(B) of this Part below in determining the prior action of the applicant.



The requested variance is not believed to be due to any prior action of the Applicant.

6. Due to the conditions of the site in question, the standard(s) will cause the applicant an undue hardship. In order to receive relief from an undue hardship an applicant must demonstrate inter alia the nature of the hardship and that the hardship is shown to be unique or particular to the site. Mere economic diminution, economic advantage, or inconvenience does not constitute a showing of undue hardship that will support the granting of a variance.

The premise of the Gano Street Relocation is improved motorist safety for entering I-195 and for avoiding weaves on the I-195 mainline when Gano Street traffic enters the highway. To not construct the Relocation would result in no improvement to the current merging patterns on the highway. The seaward limits of the proposed Relocation cannot be shifted landward for the reasons presented in 3, above.

5.5 CRMP § 1.1.8 – Special Exceptions

It is believed that no portion of the Project requires a special exception. No work is proposed on Manmade Shoreline (unless rip-rap slope protection at the proposed Gano Street Relocation should be considered part of the Manmade Shoreline), and no prohibitions are noted under CRMP § 1.2.2(F). Filling, removing, and grading on Manmade Shorelines is not prohibited under CRMP § 1.3.1(B), nor is construction of public roads under CRMP § 1.3.1(M), provided the requirements of CRMP § 1.2.2.G [sic 1.2.2.F] are met. No alteration of shoreline features is proposed for the remainder of the Project at other locations.

5.6 CRMP § 1.1.9 – Setbacks

Based on VHB's understanding of conversations held at the October 13, 2021, joint pre-application meeting, a 50-foot setback applies to the partial relocation of Gano Street and its associated Bikeway. Setbacks from other Project components will either be readily met, or do not apply. A variance to the setback standard is respectfully requested by the Applicant, in accordance with CRMP § 1.1.7, as addressed in Section 5.4 above.

5.7 CRMP § 1.1.10 – Climate Change and Sea Level Rise

It is presumed that CRMP § 1.1.10(A)(4) is satisfied by the requirements of CRMP § 1.1.6(I), as described above in Section 5.3. Analysis of sea level rise and coastal inundation relative to the Project has been accomplished using the Stormtools online mapping tool.

The Applicant acknowledges the policies in Section 1.1.10(A). The Applicant has reviewed the effective Federal Emergency Management Agency (FEMA) flood maps (10/02/2015) and the 1% annual chance storm event with 10 feet of sea level rise

and has determined that this scenario would have an impact over the 75-year useful life of the new construction elements.

The following Project elements will be located partially within a FEMA VE flood zone.

- › Relocation of Gano Street and a section of the Blackstone River Bikeway.
- › Construction of a new bridge structure to carry traffic from Gano Street in Providence onto I-195 Westbound. This will be RIDOT Bridge No. 126601 – Gano Street On-Ramp bridge.
- › Construction of new retaining walls to support the embankments around the new bridge at the Gano Street Off-Ramp (RIDOT Bridge No. 126601).

The bridge is designed with 45 feet of clearance over the navigation channel. The eastbound off-ramp construction at Waterfront Drive in East Providence will be located outside of the FEMA VE flood zone.

Based on a sea level rise assessment using Stormtools (RI CRMC, 2021), additional Project elements will be impacted by projected future sea level rise scenarios. Within the next 75 years, 10 feet of sea level rise may impact lower portions of the new off-ramp from I-195 Eastbound to Waterfront Drive in East Providence. Similarly, the Gano Street On-Ramp may experience flooding associated with 10 feet of sea level rise.

During a 1% annual chance storm with 10 feet of sea level rise, structures that were once otherwise protected will be impacted by floodwater. At Valley Street and Waterfront Drive, the storm surge elevation (Stormtools Design Elevation) ranges from approximately 26-30 feet. The storm surge elevation (Stormtools Design Elevation) for the Gano Street area ranges from approximately 26-38 feet. The new bridge structure (RIDOT Bridge No. 126601) will be elevated above the base flood elevation (13 feet), but the road, sidewalk, and Bikeway may continue to experience flooding.

By 2100, storm surge coupled with 10 feet of sea level rise may restrict access to and exit from the Washington Bridge from both the east and the west. Adaptation strategies and techniques are limited for this bridge rehabilitation Project. Parts of the new Gano Street alignment will be elevated through grading to better protect the low-lying road. This will reduce initial road flooding caused by sea level rise.

No coastal erosion rate is documented for the Project Area.

5.8 CRMP § 1.1.11 – Coastal Buffer Zones

The existing land area associated with the proposed Gano Street and Bikeway Relocation beneath the footprint of the Washington Bridges is entirely unvegetated. Areas of the Relocation proposed north of the bridge footprint will be positioned landward of existing Bikeway limits, and proposed Relocation areas south of the bridge footprints are currently lawn and will remain as lawn under post-project conditions seaward of the proposed Relocation.



At the proposed Valley Street Connector on the East Providence side of the Seekonk River, a broad naturalized vegetated area ± 130 feet wide is present between the existing detention pond and coastal feature. The detention pond is contained within a chainlink fence, and Project limits for the proposed pond maintenance activities will remain within the fence, with the exception of temporary construction access that will occur landward of the detention pond. No earth disturbances or vegetation clearing is proposed outside the limits of the chainlink fence.

5.9 CRMP § 1.1.12 – Fees

CRMC fees are not assigned to RIDOT projects. Although no fee is required for this application, the "Statement of Disclosure and Applicant Agreement as to Fees" form has been signed by RIDOT and included as part of the application, based on informal conversation with CRMC permitting staff.

5.10 CRMP § 1.2.1(E) – Type 4 Multipurpose Waters

The tidal waters of the Seekonk River are identified as Type 4 Multipurpose Waters, as described in Section 3.4.1 above, but the Project does not include work in tidal waters. Spudded temporary work barges needed to perform aerial work on the Washington Bridge will be the only direct contact with Type 4 Waters. Stormwater runoff associated with the Project will be managed and treated in accordance with the Stormwater Rules at 250-RICR-150-10-8 and in accordance with the federal Consent Decree between the USEPA, RIDEM, and RIDOT, to protect the water quality of the Seekonk River.

5.11 CRMP § 1.2.1(G) – Type 6 Commercial Navigation Channels

The federal navigation channel in central portions of the Seekonk River, under Washington Bridge Span 7, is identified as Type 6 Commercial Navigation Channel, as described in Section 3.4.1 above, but the Project does not include modification of the channel (see **Figure 2A** of **Appendix A** for general location of Span 7 and the Navigation Channel). Spudded temporary work barges will be needed to perform aerial work on the Washington Bridge, and coordination with the USCG and local Harbor Master will be ongoing. Work schedules and work plans will be provided to the USCG and Harbor Master through the duration of barge work.

5.12 CRMP § 1.2.2(C) – Coastal Wetlands

Project activities will occur distant from the low-saltmarsh fringe present on the East Providence shoreline of the Seekonk River and described in Section 3.4.6.4, above, for the proposed Waterfront Drive Off-Ramp. Consequently, no direct or indirect effects to the saltmarsh are anticipated. Coastal wetlands were not identified within other Project Areas.

5.13 CRMP § 1.2.2(F) – Manmade Shorelines

1.2.2(F)(1)(c) - The Council encourages proper maintenance of existing shoreline protection structures (see § 1.3.1(G) of this Part).

The Project is believed not to propose work on Manmade Shoreline associated with the Washington Bridge, but this application assumes the possibility that the rip rap slope adjacent to Manmade Shoreline could potentially be considered part of the manmade feature, as advised by ABS. All work will remain landward of tidal waters but will occur on an existing stone rip rap slope landward of concrete pier foundations, pier walls, and retaining walls. A retaining wall is proposed on the rip rap slope as part of the Gano Street and Bikeway Relocation, and all rip-rap slope protection currently in place will be restored where disturbed during construction of the proposed retaining wall. The proposed retaining wall will serve to further protect the slope and abutting features from upslope erosive forces.

1.b. The Council's goals are:

(1) to encourage the maintenance of structures that effectively mitigate erosion and/or sustain landforms adjacent to the water; and

The piers, pier foundations, retaining walls, and stone rip rap that form the Manmade Shoreline are effectively sustaining the contiguous landform and show no indication of erosion. The rip rap slope protection appears to be effectively preventing slope erosion.

(2) prevent the accumulation of debris along the shore where such structures are ineffective or no longer in active use.

The structures are actively serving their purpose, and no indication of debris trapping has been observed during recent field reviews.

c. The Council encourages proper maintenance of existing shoreline protection structures (see § 1.3.1(G) of this Part).

The piers, pier foundations, retaining walls, and stone rip rap that form the Manmade Shoreline are in good condition and do not appear to require maintenance.

5.14 CRMP § 1.2.3 Areas of Historic and Archaeological Significance

As described in Sections 2.3.2 and 2.3.3 above, procedures for complying with Sections 106 of the National Historic Preservation Act of 1966 and Section 4(f) of the US Department of Transportation Act of 1966 were followed for the Project. A finding of no adverse effect was determined for the proposed Gano Street Relocation relative to the Hunter S. Marston Boathouse, which is eligible for listing on the National Register of Historic Places. Six properties in the Project Area met



requirements of Section 4(f), but findings of no use were determined, and Section 4(f) Evaluations were not required. Under Section 106, a Project specific Programmatic Agreement has been executed, and stipulations of the Agreement must be followed during construction of the Project. These include the monitoring of subsurface excavations during construction in areas of moderate to high historic period archaeological sensitivity, which potentially occur at the proposed Waterfront Drive Off-Ramp and proposed Gano Street On-Ramp, as described further in Sections 4.2 and 4.4, above.

5.15 CRMP § 1.3.1(A) – Category B Requirements

The technical responses to the compliance items outlined below pertain specifically to the Category B requirements of the Gano Street and Bikeway Relocation. Where applicable, other Project activities are mentioned.

The requirements herein for a Category B Assent are necessary data and information for the purposes of federal consistency reviews. All persons applying for a Category B Assent are required to:

a. Demonstrate the need for the proposed activity or alteration

The existing Gano Street On-Ramp to I-195 Westbound is insufficient in length and requires rapid acceleration over a short distance for motorists to merge safely onto I-195. A portion of Gano Street and the Blackstone River Bikeway are proposed to be shifted eastward (seaward) to provide sufficient ramp length for safe acceleration onto the I-195 mainline. The Relocation will additionally achieve an improved alignment that will allow for safer merges and reduced weaving by highway through traffic as currently necessary to avoid entering vehicles.

b. Demonstrate that all applicable local zoning ordinances, building codes, flood hazard standards, and all safety codes, fire codes, and environmental requirements have or will be met; local approvals are required for activities as specifically prescribed for nontidal portions of a project in §§ 1.3.1(B), (C), (F), (H), (I), (K), (M), (O) and (Q) of this Part; for projects on state land, the state building official, for the purposes of this section, is the building official;

The Project proponent is RIDOT, and RIDOT's State Licensed Professional Engineering consultants designed the Gano Street and Bikeway Relocation (and all Project component's requiring a RI-licensed Professional Engineer's stamp) to current AASHTO standards, and they certify that the designs are sound. Local zoning ordinances are not applicable. An overview of permit consultations and permit requirements for the Project are outlined in Section 2 above.

c. Describe the boundaries of the coastal waters and land area that is anticipated to be affected;

The Gano Street and Bikeway Relocation proposes encroachment onto a seaward facing rip rap slope that is contiguous with Manmade Shoreline abutting Type 4 Waters beneath the Washington Bridge. The comprehensive Project Area in general borders on CRMP Type 4 and Type 6 Waters, but no work in tidal waters is proposed project wide. The coastal features associated with 200-foot Contiguous Areas at the different locations within the Project Area include coastal wetland, manmade shoreline, and coastal embankment. Please see Section 4 above for descriptions of Project activities and land areas to be affected.

- d. *Demonstrate that the alteration or activity will not result in significant impacts on erosion and/or deposition processes along the shore and in tidal waters;*

The subject protected slope comprises coarse stone rip rap, as described in Section 5.13 above. It currently is stable with no evidence of erosion. Under post-Project conditions, a modular block retaining wall will be constructed, which will serve to lessen slope work and retain the landform. Coarse stone rip rap will continue to armor the slope, and any slope area temporarily disturbed due to wall installation will be treated with the same size rip rap. Areas landward of the wall will largely comprise Bikeway and road pavement, and associated stormwater runoff will be captured in closed drainage systems. Accordingly, the opportunity for slope erosion or for erosive and depositional forces in tidal waters is not anticipated.

- e. *Demonstrate that the alteration or activity will not result in significant impacts on the abundance and diversity of plant and animal life;*

No work is proposed in tidal wetlands or on vegetated coastal features. The Gano Street and Bikeway Relocation will occur on areas that are currently developed, where substrates are either unvegetated and composed of stone rip rap, on impervious Bikeway surface, on compacted gravel and crushed stone, or on existing maintained lawn areas. Prior to circa 2006, Gano Street was located under Bridge Span 3, the same span under which the re-alignment currently is proposed. The former Gano Street roadbed was present until approximately 2018. No areas of naturalized vegetation will be affected by the proposed Relocation work.

- f. *Demonstrate that the alteration will not unreasonably interfere with, impair, or significantly impact existing public access to, or use of, tidal waters and/or the shore;*

As part of the Gano Street Relocation, the existing Blackstone River Bikeway will be reconstructed and intentionally located on the seaward side of Gano Street, as it is currently, and existing linkages to public facilities and the shoreline will remain unimpacted. Importantly, southerly connectivity to India Point Park and the East Bay Bike Path and northerly connectivity along the Seekonk River and to the Blackstone Corridor will remain unchanged under post-Project conditions. Furthermore, the proposed Gano Street On-Ramp will be constructed as a bridge within the current alignment of Gano Street to specifically provide a



sidewalk and greenspace for pedestrian access to link the Gano Street neighborhoods with India Point Park. The subject area is not known to be used for boat launching and is presumed not suitable for such activity.

- e. *Demonstrate that the alteration will not result in significant impacts to water circulation, flushing, turbidity, and sedimentation;*

No work in tidal waters is proposed, and all stormwater runoff generated by the Gano Street and Bikeway Relocation will be properly routed to existing closed drainage collection systems and directed to the existing, three-compartment, water quality pond treatment system. Consequently, changes in the means or routes by which inflows reach tidal waters will not occur, and no new point discharges to the shoreline are proposed.

- f. *Demonstrate that there will be no significant deterioration in the quality of the water in the immediate vicinity as defined by DEM;*

No in-water work is proposed, and all stormwater runoff generated by elements of the proposed Project, and pre-existing contributing catchments, will be managed and treated in compliance with the Stormwater Rules at 250-RICR-150-10-8. Furthermore, proper erosion and sedimentation controls will be installed prior to the commencement of construction and are to be properly maintained throughout the duration of construction. A RIDOT Large-Site SWPPP has been prepared for the Project and will be implemented through construction completion.

- g. *Demonstrate that the alteration or activity will not result in significant impacts to areas of historic and archaeological significance;*

Please see Section 5.14 immediately above. It outlines findings specific to historic and archaeological significance and references other sections in this application document where such significance is addressed.

- h. *Demonstrate that the alteration or activity will not result in significant conflicts with water dependent uses and activities such as recreational boating, fishing, swimming, navigation, and commerce, and;*

No in-water work will be required for the Gano Street and Bikeway Relocation, and none is required for the entire Project. Spudded temporary work barges will be required for aerial work on the Washington Bridge, but proper consultation has occurred with USACE NED, NOAA Fisheries, USCG, and the local Harbormaster regarding barge use for the Project, as indicated in Section 2.3 above.

- i. *Demonstrate that measures have been taken to minimize any adverse scenic impact (see § 1.3.5 of this Part).*

The Gano Street Relocation portion of the Project has been designed to fit with the surrounding character of the area, and its features will be of similar elevation to existing low profile conditions as viewed from coastal waters. The Bikeway will be the seaward most Project element, and it will appear no different than its

current appearance, with split-rail fence and grassed slopes where not under the Washington Bridge. Portions of the Bikeway under the Bridge will be set just landward of the modular block retaining wall, which is expected to blend well with the existing concrete piers, pier foundations, and other retaining walls. With respect to seaward views, those from the Bikeway will remain essentially unchanged.

5.16 CRMP § 1.3.1(B) Filling, Removing, or Grading of Shoreline Features

By virtue of the objectives established for the Gano Street Relocation and the on-site constraints posed by Washington Bridge pier locations, the Applicant finds it necessary to encroach onto the rip rap slope contiguous with Manmade Shoreline. To avoid jeopardizing existing slope integrity and the creation of nonconforming steep slopes, a modular block retaining wall has been proposed where the Relocation must occur on the coastal feature.

With respect to the Policies outlined in CRMP s 1.3.1(B), a RIDOT Large-Site SWPPP has been prepared for the entirety of the Project as part of the application for RIPDES CGP authorization. The SWPPP has been prepared in concert with the erosion and sedimentation control measures specified on the Project plans and is consistent with the policies and standards of this section and with the RISESCH. With respect to Category B thresholds, the proposed filling will require less than 10,000 cubic yards of material, will occupy significantly less than two acres, and will be associated with an area recognized for potential archaeologic sensitivity but appearing to be located just outside, or along the outer fringe, of the 200-foot Contiguous Area.

The Project does not propose a prohibited activity under CRMP s 1.3.1(B), and all standards are expected to be met. A significant portion of slope work will be avoided via use of the retaining wall, and the potential for slope erosion will be greatly reduced. Seaward of the retaining wall, the slope will be kept at the same shallowness as currently associated with the rip rap. Where the slope will transition out from under the Bridge footprint to the north and south, the slope will change from rip rap to loam and seed at no steeper than 3:1. All exposed surfaces are to be seeded and mulched or otherwise stabilized immediately upon completion of finish grading, as indicated in the SWPPP and Standard Notes. No material other than the final surface treatment is to be placed or deposited on the coastal feature, no material is to be placed in tidal water, no material is to be temporarily stored on the feature, and all material is to be clean and free of potential pollutants. The underlying soil material is presumed to be impacted, and the landward area under the Bridges has been capped, so all appropriate regulatory protocols will be followed for impacted materials handling, testing, transporting, and disposal under the auspices of RIDEM LRSMM and in accordance with all applicable federal and state regulations. No pedestrian access to the slopes will be provided, and the split-rail fence to be installed along the Bikeway is intended to keep pedestrians and



cyclists safely on the Bikeway. Filling, removing, or grading of Shoreline Features is not proposed at any other Project location. The concrete type to be used for the modular block retaining wall is expected to be Type II air entrained Portland cement to guard against salt spray deterioration over time.

5.17 CRMP § 1.3.1(F) – Treatment of Sewage and Stormwater

Stormwater management facets of the project are addressed above under the respective Project work areas described in Section 4. The stormwater designs for the entirety of the Project comply with the RI Stormwater Rules at 250-RICR-150-10-8. On-site wastewater treatment systems are not proposed as part of the Project.

Prohibited activities under CRMP s 1.3.1(F) are not proposed for the Project, and all standards listed under CRMP § 1.3.1(F)(4)(e) are expected to be met. The Project proposes the relocation of a roadway and construction of highway ramps presumed to be subject to CRMP § 1.3.1(M) and accordingly provides treatment and management of stormwater runoff for all new impervious surfaces. A Stormwater Management Plan (**Appendix Q**) has been prepared specific to the Project to address each Project location and to demonstrate compliance with the RI Stormwater Rules. A long-term Stormwater Operation and Maintenance (O&M) Plan accompanies the Stormwater Management Plan and Large-Site SWPPP (**Appendix R**), prepared specific to the Project to outline inspection and maintenance requirements for the water quality ponds, detention pond, and STU and to help ensure their proper, long-term function.

In accordance with CRMP § 1.3.1(F)(4)(g), the stormwater management designs incorporate sound practices to avoid potential impacts associated with the discharge of stormwater runoff into the coastal environment. No new point source discharges are proposed, and all stormwater runoff to be generated by new impervious surfaces, and portions of existing surfaces, will be routed through either existing closed drainage systems with no increase in volume or through proposed closed systems directed to proposed or existing stormwater management features for proper pre-treatment and treatment prior to discharge. Consequently, adverse effects to tidal waters concerning salinity, temperature, and dissolved oxygen are not anticipated. No stormwater discharges associated with the Project are known to exit at coastal wetlands.

5.18 CRMP § 1.3.1(J) – Filling in Tidal Waters

No encroachment, including filling, is proposed in tidal waters for any part of the Project. The Gano Street Relocation represents the closest Project distance between tidal waters and proposed earth disturbing activities.

5.19 CRMP § 1.3.1(M) – Public Roadways, Bridges, Parking Lots, Railroad Lines, and Airports

Segments of proposed new public roadways and an expansion of an existing public roadway are the key elements of the Project, comprising the widening of Washington Bridge No. 700, the Relocation of Gano Street, the construction of a new highway off-ramp, the replacement of an existing highway on-ramp, and associated ramp and local road tie-ins. Much of the proposed work will occur aerially above the Seekonk River or within the outermost fringe of the 200-foot Contiguous Area. Only the Gano Street Relocation will occur in proximity to a coastal feature. Regardless of the proposed roadway work location, stormwater runoff will be managed in accordance with CRMP § 1.3.1(F), as described above. The proposed bridge that will allow pedestrians to pass under the proposed Gano Street On-Ramp (to become RIDOT Bridge No. 126601) will be inland within the 200-foot Contiguous Area, but well distanced from shoreline features, in accordance with CRMP § 1.3.1(M)(1)(c). A second proposed new bridge (to become RIDOT Bridge No. 126701) will be in East Providence well inland of the 200-foot Contiguous Area and will carry the Veterans Memorial Parkway and Taunton Avenue over the proposed Waterfront Drive Off-Ramp. All new and reconfigured roadways and bridges will be within existing developed areas, such that impacts to vegetation will be minimized to avoided, depending upon the location.

In accordance with CRMP § 1.3.1(M)(2)(a)(3), and in the event the rip rap slope should be considered part of the Manmade Shoreline feature, construction of public roadways may be permitted on Manmade Shorelines, subject to the requirements of CRMP § 1.2.2(G) [sic § 1.2.2(F)], which are addressed above in Section 5.13. Consequently, the partial Relocation of Gano Street, with unavoidable encroachment onto upper parts of the rip rap slope abutting Manmade Shoreline due to bridge span positioning, does not propose a prohibited activity and does not require a special exception. In accordance with the Standards specified in CRMP § 1.3.1(M)(3)(a-e), the Gano Street Relocation design meets the policies and standards of CRMC §§ 1.3.1(B and F), concerning Filling, Removing, or Grading of Shoreline Features and the Treatment of Sewage and Stormwater, and a paved road surface is allowable in that the Relocation is not adjacent to Type 1, 2, or 3 Waters.

5.20 CRMP Section 1.3.5 – Policies for the Protection and Enhancement of the Scenic Value of the Coastal Region

Proposed Project activities on the East Providence side of the Seekonk River will be distanced from the shoreline and are believed to fit aesthetically with the existing developed urban surroundings. The Gano Street and Blackstone River Bikeway Relocation in Providence is expected to be similarly compatible with existing neighborhood conditions, as described previously for the proposed block retaining wall and grassed slopes of the Bikeway as viewed landward. Due to the relatively low profile of the proposed Gano-Street On-Ramp, and its location closer against the I-195 embankment, views seaward are not expected to be compromised as viewed

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form the abutting neighborhood to the northwest. With respect to the Hunter S. Marston Boathouse, the seaward edge of the Relocation is expected to appear as it currently exists, with a grassed-slope shoulder. However, much of the Bikeway Relocation will be obscured by an elevated landform at the property line, as viewed landward from the Boathouse and its seaward waters. With respect to vegetation retention and tree planting in proximity to Type 4 Waters, vegetation is not able to grow under the footprint of the Washington Bridge, and seaward portions of the Relocation areas outside the Bridge footprint will mimic current conditions, which afford users of the shared use Bikeway seaward views of the Seekonk River and Washington Bridge architecture.

5.21 CRMP Section 1.3.6 – Protection and Enhancement of Public Access to the Shore

Proposed Project activities on the East Providence side of the Seekonk River will be distanced from the shoreline and will result in no direct access conflicts with shoreline features. The proposed Waterfront Drive Off-Ramp and Valley Street Connector will increase the ease of access to Waterfront Drive, which provides shoreline views and access to Water Street and Bold Point Park. On the Providence side of the Seekonk River, the Gano Street Relocation will continue to provide direct access to India Point Park, and the Blackstone River Bikeway will be reconstructed as part of the Relocation to continue providing access to India Point Park and the East Bay Bike Path.



6

Closing Statement

The proposed Washington Bridge Project has been designed to comply with all applicable CRMC goals and policies. All required consultations with Federal regulatory entities have concluded, and no further action is required. At a state level, an application for RIPDES CGP authorization is being filed concurrently to CRMC with this Category B Coastal Assent application. Permitting coordination as required with RIDEM LRSMM has been maintained and will remain ongoing throughout construction regarding the known presence of impacted materials and open regulatory commitments. At a federal level, the Project meets Self Verification criteria with USACE NED for the temporary use of work barges in Waters of the US, and coordination with the USCG will remain ongoing for the use of temporary work barges in navigable Waters of the US. A Programmatic Agreement pertaining to Section 106 of the Historic Preservation Act of 1966 concerning potential areas of archaeological significance has been executed and will be adhered to during excavation activities in the identified areas of concern.

The Project proposes no work in tidal waters, no work on shoreline features (unless the rip rap slope protection at the proposed Gano Street Relocation should be considered part of the Manmade Shoreline), and no new point source discharges to shoreline features or tidal waters. Work within CRMC jurisdiction on the East Providence side of the Seekonk River will be limited to the outermost portions of 200-foot Contiguous Area.

For the reasons stated above and presented in preceding sections, the Applicant respectfully requests the Council's review of this Category B coastal assent application and the ultimate issuance of Coastal Assent.



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7

References

Rhode Island Coastal Resources Management Council. Effective June 17, 2019. Rhode Island Coastal Resources Management Program (650-RICR-20-00-01).

Rhode Island Department of Environmental Management. Environmental Resource Map. Available at:

<http://ridemgis.maps.arcgis.com/apps/webappviewer/index.html?id=87e104c8adb449eb9f905e5f18020de5>.

Rhode Island Department of Environmental Management and Coastal Resources Management Council. March 2015. Rhode Island Stormwater Design and Installation Standards Manual.

Rhode Island Department of Environmental Management, Office of Water Resources, Stormwater Management, Design, and Installation Rules (Stormwater Rules) (250-RICR-150-10-8).

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Rhode Island Department of Environmental Management. February 2021. State of Rhode Island 2018-2020 Impaired Waters Report.

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Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (FIRM) for Providence County Rhode Island Map Number No. 44007C0309K, revised October 2, 2015. Federal Emergency Management Agency, Washington, D.C.

U.S. Department of Agriculture. Natural Resources Conservation Service. Web Soil Survey <http://websoilsurvey.sc.egov.usda.gov/App/HomePage.htm>.

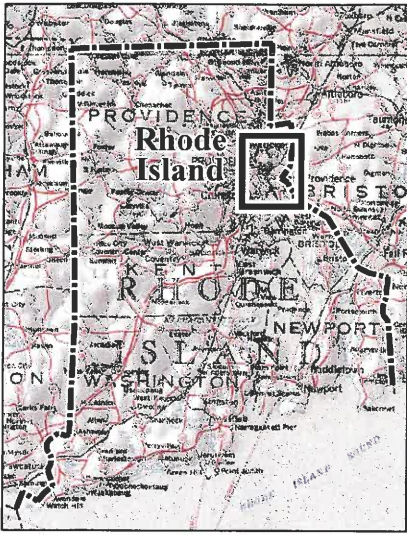
Appendix A – Project Figures

- Figure 1. Project Location Map
- Figure 2. Project Overview with Project Limits (11x17")
- Figure 2A. Area Features and Project Elements
- Figure 3. CRMC/RIDEM Freshwater Jurisdiction Map
- Figure 4. CRMC Water Type Classification Mapping
- Figure 5. Special Flood Hazard Zones Mapping
- Figure 6. NRCS Web Soils Survey Mapping
- Figure 7. Natural Heritage Polygon Mapping
- Figure 8A. Aerial Imagery of Former Gano Street Alignment Under Bridge Span 3 – 2002
- Figure 8B. Aerial Imagery of Remnant Gano Street Alignment Under Bridge Span 3 – 2010
- Figure 8C. Aerial Imagery of Remnant Gano Street Alignment Under Bridge Span 3 – 2018
- Figure 8D. Aerial Imagery at Proposed Gano Street Relocation Area Under Bridge Span 3 – 2021

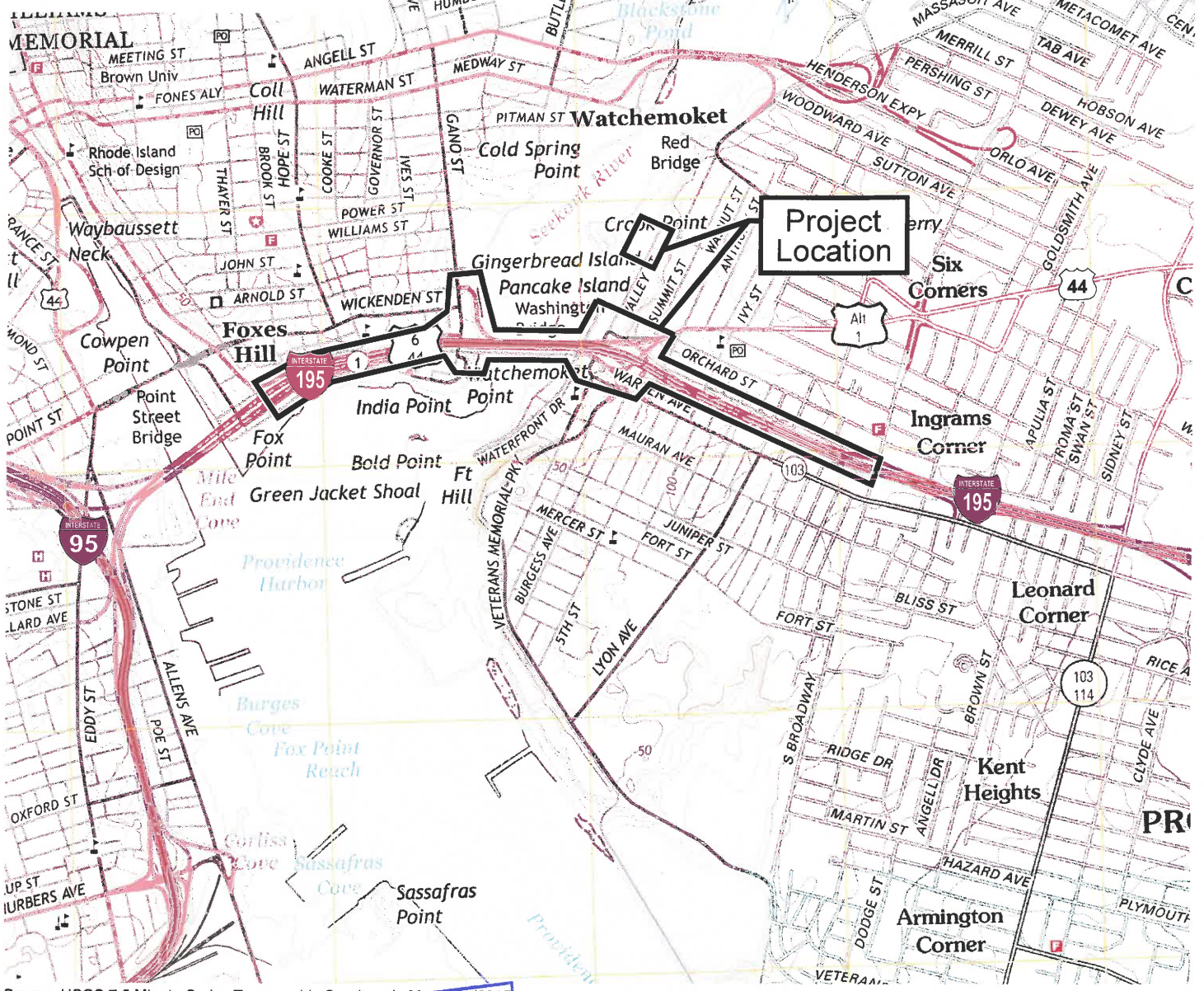


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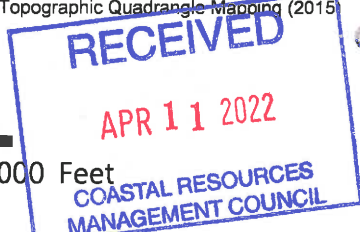
Project Location Key



Source: USGS 7.5 Minute Series Topographic Quadrangle Mapping (2015)



0 1000 2000 Feet



Project Location Map
RIDOT Bridge Group 57TB-10
I-195 Washington North Phase 2
Providence and East Providence, RI

Figure 1

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WASHINGTON, D. C.

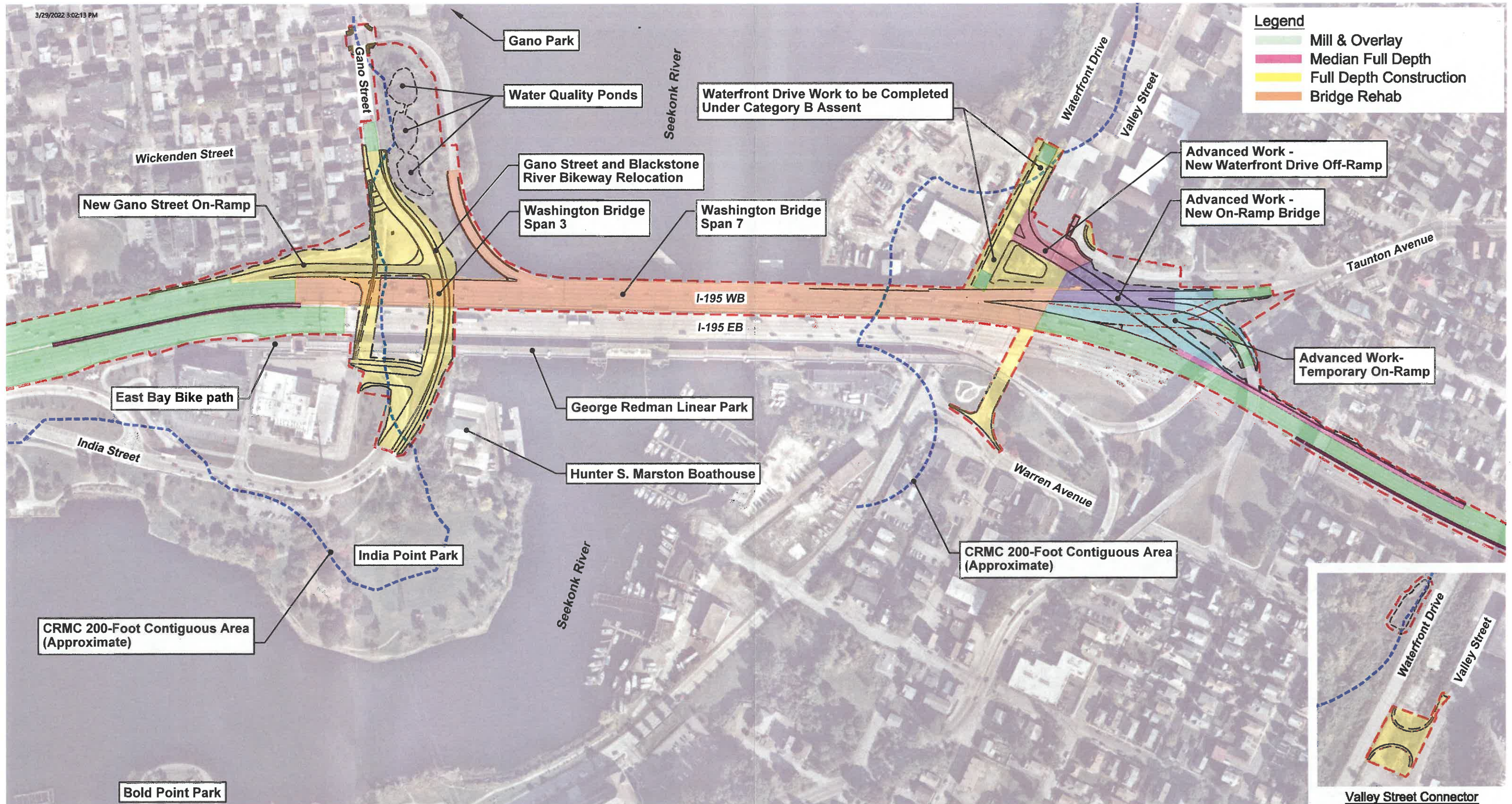


Source: VHB, March 2022

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Figure 2
RIDOT Washington Bridge
Improvements (Approximate ATC Project Limits)
RIDOT Bridge Group 57TB-10
I-195 Washington North Phase 2
Providence and East Providence, RI

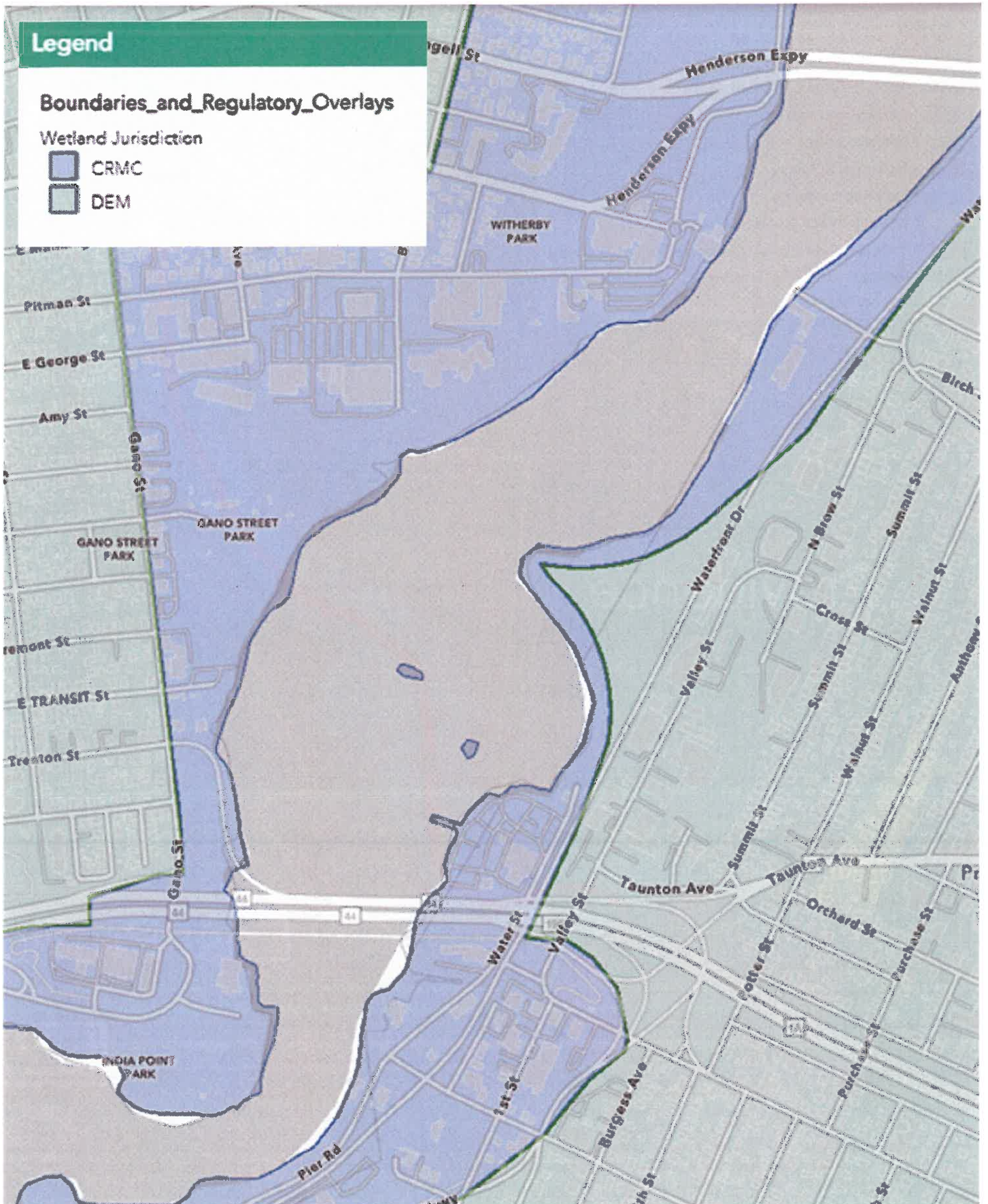


Source: VHB, March 2022



RIDOT Washington Bridge
Features and Project Elements
RIDOT Bridge Group 57TB-10
I-195 Washington North Phase 2
Providence and East Providence, RI

Figure 2A

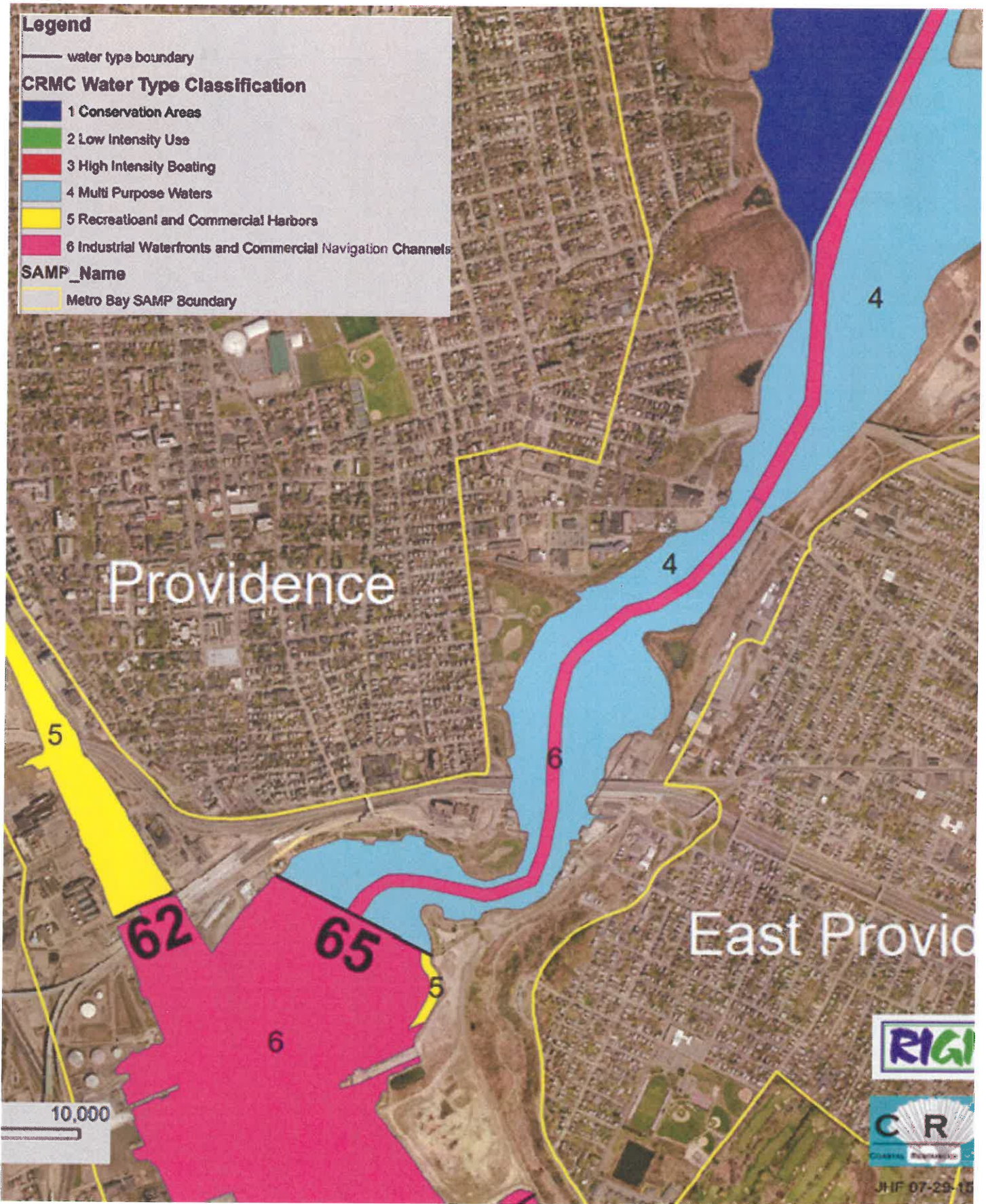


Source: RIDEM Environmental Resource Map, March 2022



CRMC/RIDEM Freshwater
Jurisdiction Map
RIDOT Bridge Group 57TB-10
I-195 Washington North Phase 2
Providence and East Providence, RI

Figure 3



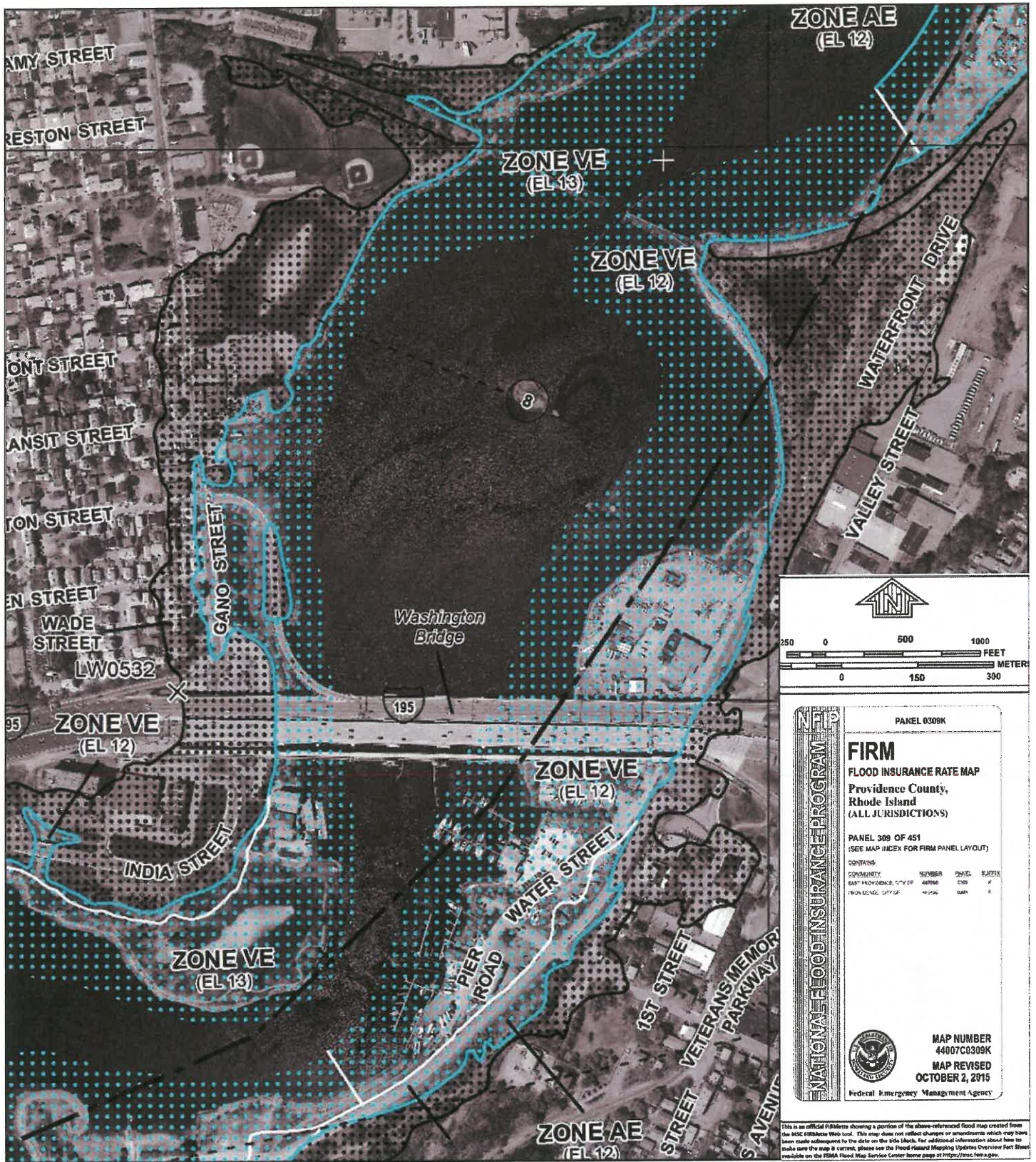
Source: CRMC Map of Water Type Classifications for Providence, Pawtucket, and East Providence (Metro Bay – North)



CRMC Water Type Classification Map
RIDOT Bridge Group 57TB-10
I-195 Washington North Phase 2
Providence and East Providence, RI

Figure 4





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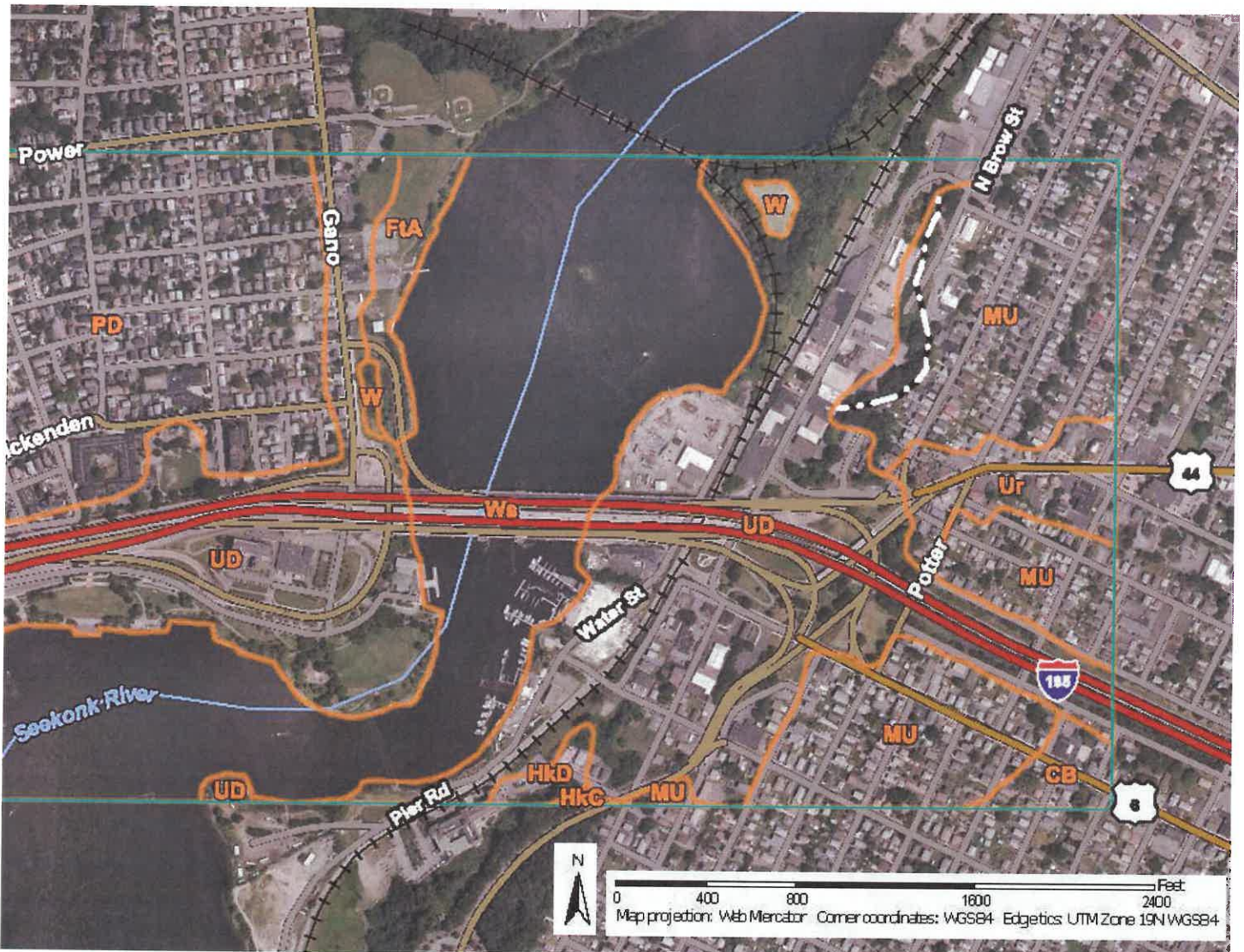
Special Flood Hazard Zones Mapping
 RIDOT Bridge Group 57TB-10
 I-95 Washington North Phase 2
 Providence and East Providence, RI

Figure 5



Map Unit Legend

Map Unit Symbol	Map Unit Name
CB	Canton-Urban land complex
FtA	Fortress sand, 0 to 3 percent slopes
HkC	Hinckley loamy sand, 8 to 15 percent slopes
HkD	Hinckley loamy sand, 15 to 25 percent slopes
MU	Merrimac-Urban land complex, 0 to 8 percent slopes
PD	Paxton-Urban land complex, 3 to 15 percent slopes
UD	Udorthents-Urban land complex
Ur	Urban land
W	Water
Ws	Water, saline



Source: NRCS Web Soil Survey, March 2022



NRCS Web Soil Survey Mapping
 RIDOT Bridge Group 57TB-10
 I-195 Washington North Phase 2
 Providence and East Providence, RI

Figure 6



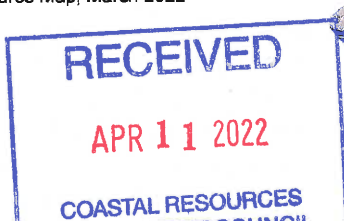
Legend

Boundaries_and_Regulatory_Overlays

Natural Heritage Area

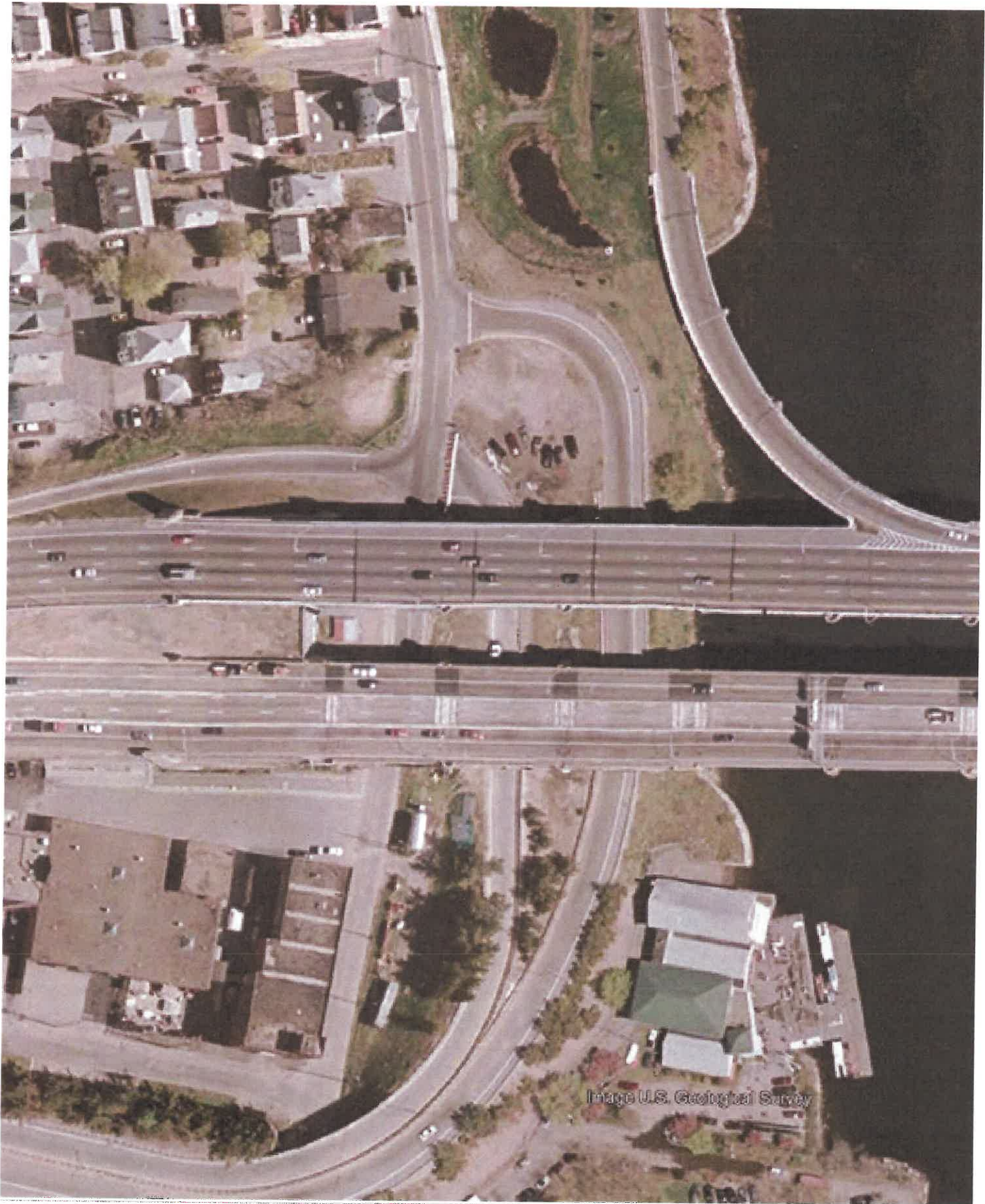


Source: RIDEM Environmental Resource Map, March 2022



Natural Heritage Polygon Mapping
RIDOT Bridge Group 57TB-10
I-195 Washington North Phase 2
Providence and East Providence, RI

Figure 7



Source: Google Earth, Imagery Date: 3/31/2002



Aerial Imagery of Former Gano Street
Alignment Under Bridge Span 3 - 2002
RIDOT Bridge Group 57TB-10
I-95 Washington North Phase 2
Providence and East Providence, RI

Figure 8A





Source: Google Earth, Imagery Date: 4/30/2010

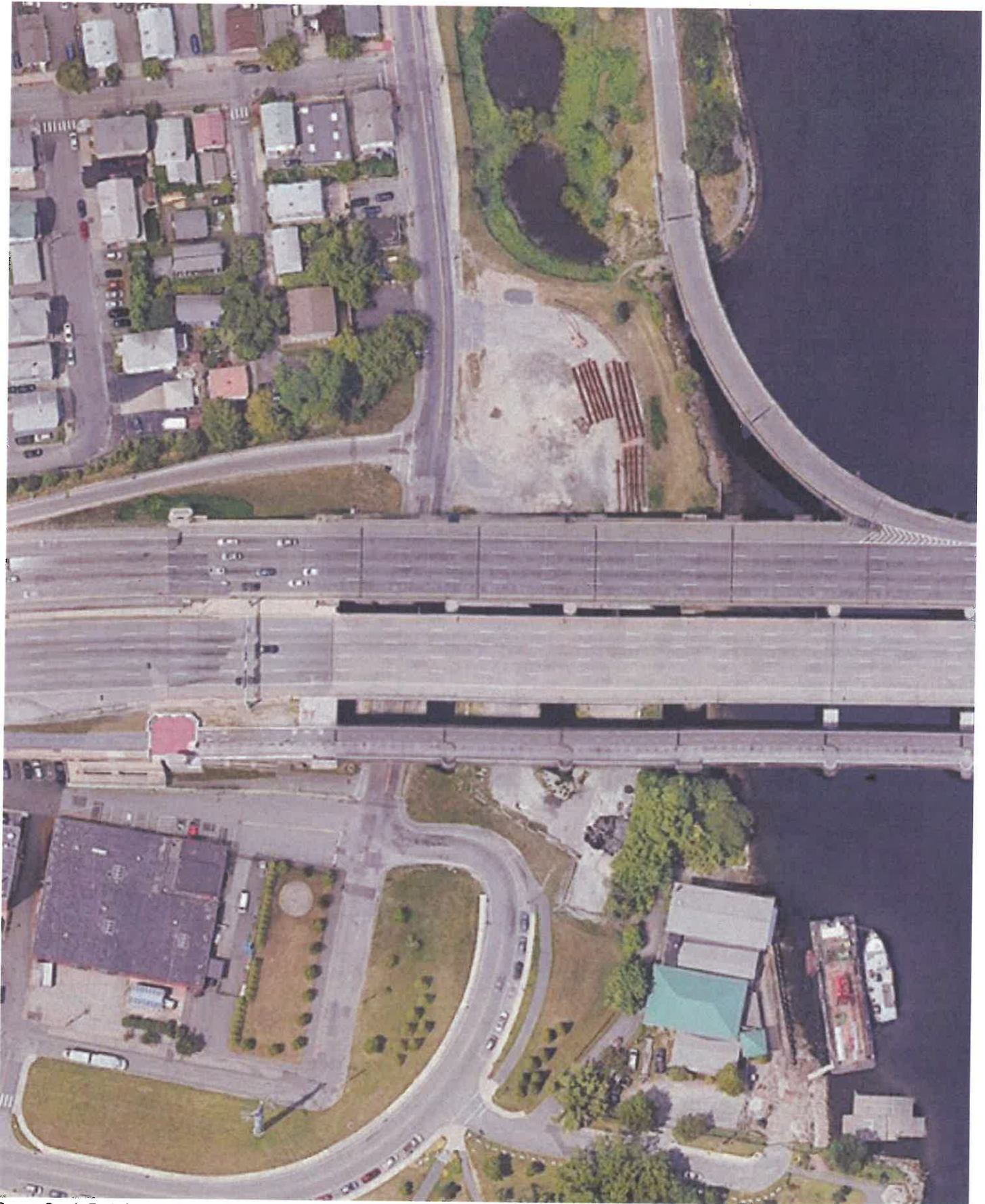
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Aerial Imagery of Remnant Gano Street
Alignment Under Bridge Span 3 - 2010
RIDOT Bridge Group 57TB-10
I-195 Washington North Phase 2
Providence and East Providence, RI

Figure 8B





Source: Google Earth, Imagery Date: 6/29/2018



Aerial Imagery of Remnant Gano Street
Alignment Under Bridge Span 3 - 2018
RIDOT Bridge Group 57TB-10
I-195 Washington North Phase 2
Providence and East Providence, RI

Figure 8C





Source: Google Earth, Imagery Date: 6/16/2021



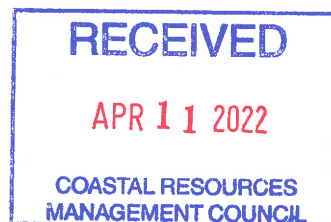
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Aerial Imagery at Proposed Gano Street **Figure 8D**
Relocation Area Under Bridge Span 3 - 2021
RIDOT Bridge Group 57TB-10
I-95 Washington North Phase 2
Providence and East Providence, RI

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Appendix B – CRMC Maintenance Assent M2021-12-070



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State of Rhode Island
Coastal Resources Management Council
Oliver H. Stedman Government Center
4808 Tower Hill Road, Suite 116
Wakefield, RI 02879-1900

(401) 783-3370
Fax (401) 783-2069

January 27, 2022

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RIDOT
c/o Alisa Richardson
360 Lincoln Avenue
Warwick, RI 02888

RE: CRMC Maintenance Certification M2021-12-070 – *perform maintenance work on the decks of Bridge 700 and elevated sections of Gano Street off-ramp (contract work Plan Phase 1, ERC-1). Specifically, work activities include: removal of bridge deck pavement for purposes of deck repair on Washington Bridge; removal of bridge deck concrete at bridge joint locations for joint elimination and repair/replacement on Washington Bridge & Gano Street off-ramp; concrete bridge barrier replacement including temporary light pole impact on Gano Street off-ramp and bridge deck and superstructure concrete repairs on Washington Bridge and Gano Street off-ramp.*

Site Location: I-195 Washington Bridge No. 700 (Westbound), Providence; Plat(s): Lot(s):

Dear Applicant:

A site inspection and review of plans submitted to this office for the above cited project indicates it is in conformance with and will have no adverse effect on the plan and program adopted by the Coastal Resources Management Council.

The Coastal Resources Management Council will interpose no objection to the work proposed, as long as all work is done in accordance with plans/and or notice submitted into this office and provided the following stipulations are adhered to.

ADDITIONAL STIPULATIONS

General Stipulations

A. The approved plans shall be those entitled “RIDOT WASHINGTON BRIDGE IMPROVEMENTS...” & “DEBRIS CAPTURE/COLLECTION OVERHANG BRACKET,” & “DEBRIS CAPTURE/COLLECTION LINK SLAB SHIELDING” designed by VHB. Except as stipulated or modified herein, all details and specifications thereon shall be strictly adhered to. Any and all changes require written approval from this office.

B. An Environmental Compliance Monitor (ECM) shall be designated to oversee project compliance with the CRMC Assent. The RE (Resident Engineer) shall ensure that one or more inspectors are available as necessary for the project, each inspector must be qualified in the required specialized environmental field (i.e. waste management, coastal wetlands, etc.). Each inspector must have the education and experience in each respective field to properly inspect the project and recommend corrective measures. The RE/ECM shall report site inspections at least once weekly and on an as needed basis during all phases of the project likely to result in environmental impacts. A dated and signed report shall be completed for the record during each inspection. Each inspection shall identify any environmental issues of concern and any non-compliance with the CRMC Assent and other agency approvals (RI Department of Environmental Management, US Army Corps of Engineers and US Coast Guard). Subsequent reports shall describe actions and remedies undertaken to rectify these issues and restore project compliance with the CRMC Assent and the approved plans. Where compliance has not been properly achieved, the RE/ECM shall notify the CRMC on a timely basis. In addition, field reports shall be available to be forwarded to the CRMC upon request.

Earthwork Stipulations

A. All soil erosion, runoff, sedimentation, and construction activity pollution prevention control measures must be implemented in accordance with CRMC approved site plan (referenced herein) and the approved "SMALL-SITE STORMWATER POLLUTION PREVENTION PLAN FOR: TEMPORARY TAUNTON AVE RAMP AND GOOD HOUSEKEEPING MEASURES FOR WASHINGTON BRIDGE DECK WORK" signed on November 1, 2021.

B. Prior to conducting earthwork and other land disturbing activities, erosion, runoff and sediment control measures shall be installed and maintained in accordance with good engineering practices including the applicable details found in the manufacturer's specifications and/or in the Rhode Island Soil Erosion and Sediment Control Handbook (as amended). These measures must be maintained until the site is stabilized through the establishment of vegetative cover and/or construction of the approved facilities (buildings, roadways, parking areas, etc.) has stabilized soils sufficiently to prevent erosion and sedimentation.

C. There shall be no discharge or disposal of toxic waste, hazardous materials, oil, grease and other lubricants, excess fertilizer, pesticides or other chemicals or controlled materials either on site or in any area which may enter a wetland, watercourse or groundwater. All spills of such materials shall be reported to the RI Department of Environmental Management for appropriate remediation. All used lubricants, excess chemicals, fertilizers, pesticides, etc., shall be removed from the site for transport, handling and disposal in accordance with all applicable state and federal regulations.

D. All excess excavated materials (soils, rock, gravel, etc.), excess construction materials, demolition debris, temporary erosion, runoff and sediment control measures, etc., shall be removed from the site for appropriate re-use and/or proper disposal at a suitable upland location or landfill. All toxic materials and waste shall be properly transported and disposed of in accordance applicable state and federal regulations.

Stormwater Management Stipulations

A. The Permittee shall construct and maintain the stormwater management practices in accordance with the CRMC approved site plan (referenced herein).

A copy of this certification to perform maintenance work shall be kept on site during construction. All conditions of original CRMC Assents that pertain to this property will be adhered to unless otherwise modified by the CRMC.

Applicant agrees that as a condition to the granting of this certification, members of the Coastal Resources Management Council or its staff shall have access to his property to make on-site inspections to insure compliance with the assent.

Licensee shall be fully and completely liable to State, and shall waive any claims against State for contribution or otherwise, and shall indemnify, defend, and save harmless State and its agencies, employees, officers, directors, and agents with respect to any and all liability, damages (including damages to land, aquatic life, and other natural resources), expenses, causes of action, suits, claims, costs (including testing, auditing, surveying, and investigating costs), fees (including attorneys' fees and costs), penalties (civil and criminal), and response, cleanup, or remediation costs assessed against or imposed upon Licensee, State, or the Property, as a result of Licensee's control of the Property, or Licensee's use, disposal, transportation,

generation and/or sale of Hazardous Substances or that of Licensee's employees, agents, assigns, sublicensees, contractors, subcontractors, permittees, or invitees.

All applicable policies, prohibitions, and standards of the RICRMP shall be upheld.
All local, state or federal ordinances and regulations must be complied with.

Please be advised that all work being permitted must be completed on or before January 27, 2025 (unless written application requesting an extension is received by CRMC sixty (60) days prior to expiration date).

Permits issued by the CRMC confer no property rights, and are valid only with the conditions and stipulations under which they are granted. Permits imply no guarantee of renewal, and may be subject to denial, revocation, or modification.

CAUTION:

The limits of authorized work shall be only for that which was approved by the CRMC. Any activities or alterations in which deviate from this assent or what was detailed on the CRMC approved plans will require a separate application and review. Additionally, if the information provided to the CRMC for this review is inaccurate or did not reveal all necessary information or data, then this permit may be found to be null and void. Plans for any future alteration of the shoreline or construction or alteration within the 200' zone of CRMC jurisdiction or in coastal waters must be submitted for review to the CRMC prior to commencing such activity. Permits, licenses or easements issued by the Council are valid only with the conditions and stipulation under which they are granted and imply no guarantee of renewal. The initial application or an application for renewal may be subject to denial or modification. If an application is granted, said permit, license and easement may be subject to revocation and/or modification for failure to comply with the conditions and stipulations under which the same was issued or for other good cause.

ATTENTION: ALL STRUCTURES AND FILLED AREAS IN THE TIDAL, COASTAL, OR NAVIGABLE WATERS OF THE STATE OF RHODE ISLAND ARE SUBJECT TO:

1. The Superior Property Rights of the State of Rhode Island in the Submerged and Submersible Lands of the Coastal, Tidal, and Navigable Waters;
2. The Superior Navigation Servitude of the United States;
3. The Police Powers of the State of Rhode Island and the United States to regulate Structures in the Tidal, Coastal, or Navigable Waters.

THE SUBMERGED AND SUBMERSIBLE LANDS OF THE TIDAL, COASTAL, AND NAVIGABLE WATERS OF THE STATE ARE OWNED BY THE STATE AND HELD IN TRUST FOR THE PUBLIC. CONVEYANCE OF THESE LANDS IS ILLEGAL; TITLES PURPORTING TO TRANSFER SUCH LANDS ARE VOID. ASSENTS THAT INVOLVE THE FILLING OR USE OF THE STATES SUBMERGED LANDS ARE GRANTED WITH THE PROVISIO THAT IT IS SUBJECT TO THE IMPOSITION OF A USAGE FEE TO BE ESTABLISHED BY THE COASTAL RESOURCES MANAGEMENT COUNCIL.

The Coastal Resources Management Council wishes to thank you for being given the opportunity to assess and review these plans. If you need additional information, please feel free to contact this office.

Sincerely yours,


Jeffrey M. Willis, Executive Director
Coastal Resources Management Council

/ajt



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Appendix C – Land Acquisition Right-of-Way Maps



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MARINE DIVISION
CALIFORNIA DEPARTMENT OF BOAT AND WATERWAYS

BIT CONC
PARKING

62-78 VALLEY STREET
MAP 16, LOT 01-003
N/F
NARRAGANSETT REALTY CORP
BOOK 1569, PAGE 243

PROPOSED TAKING
AREA=19,532± S.F.

NEW S.H.L.

114.29±

143.19±

11+00

PC 10+27.69

12+00

WATERFRONT DR

36+00

35+00

E.S.H.L.

198.93±

STREET LINE

VALLEY ST

126.93±

E.S.H.L.

RAMP M

504+00

PT 501+04.26

201+00

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1 Cedar Street
Suite 400
Providence, RI 02903
401.272.8100

RHODE ISLAND
DEPARTMENT OF TRANSPORTATION
WASHINGTON NORTH PHASE 2

WATERFRONT DRIVE/VALLEY STREET
PROPERTY TAKING

EAST PROVIDENCE

RHODE ISLAND

SCALE: 1"=30'

DATE: 2/2022

FIGURE

160 VALLEY STREET
MAP 105, LOT 05-008
N/F
CEMET HOLDINGS
ENTERPRISES LLC
BOOK 3125, PAGE 68



0+00

0+00

90.49±

NEW S.H.L

PROPOSED TAKING
AREA=20,740± S.F.

S62°30'33"E

1+00

163.71'

1+64

WATERFRONT DR

220.12±

PROPOSED
CONNECTOR ROAD

214.66±

VALLEY ST

100.44±

STREET LINE

STREET LINE

RHODE ISLAND
DEPARTMENT OF TRANSPORTATION
WASHINGTON NORTH PHASE 2

WATERFRONT DRIVE/VALLEY STREET
PROPERTY TAKING

EAST PROVIDENCE

RHODE ISLAND

SCALE: 1"=30'

DATE: 12/2021

FIGURE

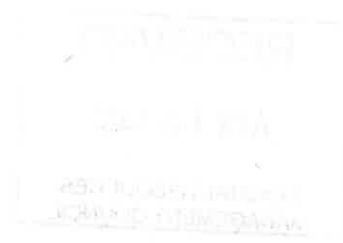


1 Cedar Street
Suite 400
Providence, RI 02903
401.272.6100

Appendix D – List of Adjacent Property Owners (Relative to Category B Work Activities)

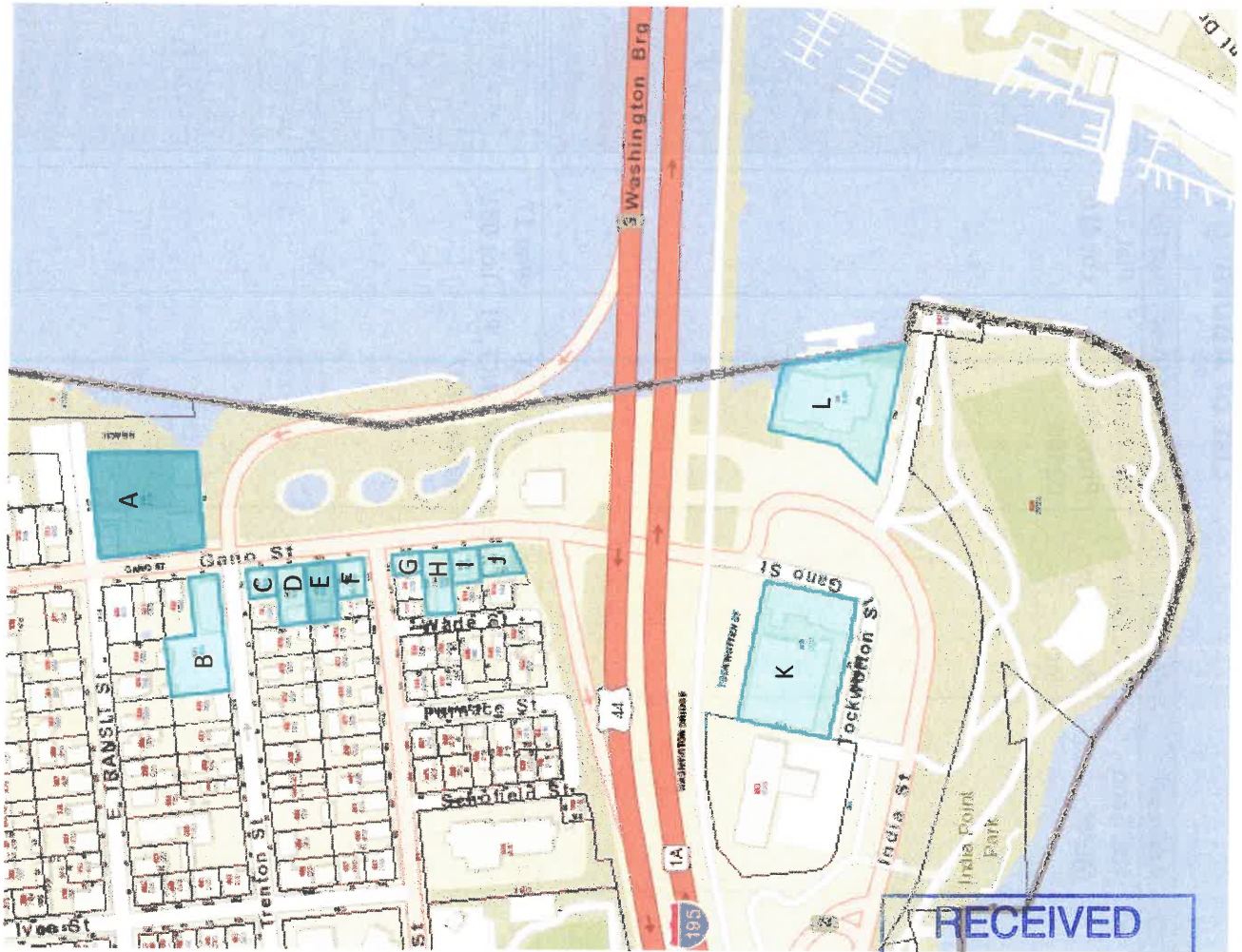


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List of Abutting Property Owners .

**RIDOT Bridge Group 57TB-10:
I-195 Washington North Phase 2
Providence & East Providence, RI**



Source: City of Providence, Department of Planning and Development, Web Mapping Application, "Where's My Parcel and What's My Zone." Accessed March 2022.

List of Abutting Property Owners (Continued)

ID	Address	Owner	Owner Address	Lot ID	Aerial Map
A	101 Gano Street	H.V. Collins Properties Inc.	101 Gano St Providence, RI 02906	Plat 17 Lot 416	
B	92 Gano Street	Portuguese Sporting Club	92 GANO ST PROVIDENCE, RI 02906-3807	Plat 17 Lot 631	

List of Abutting Property Owners (Continued)

ID	Address	Owner	Owner Address	Lot ID	Image
C	69 Trenton Street	Alves Hildabranda	79 TRENTON ST PROVIDENCE, RI 02906-3846	Plat 17 Lot 466	
D	82 Gano Street	Han Yaoping	82 Gano St. Providence, RI 02906	Plat 17 Lot 467	

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COASTAL RESOURCES
MANAGEMENT COUNCIL

List of Abutting Property Owners (Continued)

ID	Address	Owner	Owner Address	Lot ID	Image
E	76 Gano Street	WIRSA LLC	2 Meadow Cir Barrington, RI 02806	Plat 17 Lot 468	
F	670 Wickenden St.	Dawson James	670 Wickenden St., Providence, RI 02903	Plat 17 Lot 469	

List of Abutting Property Owners (Continued)


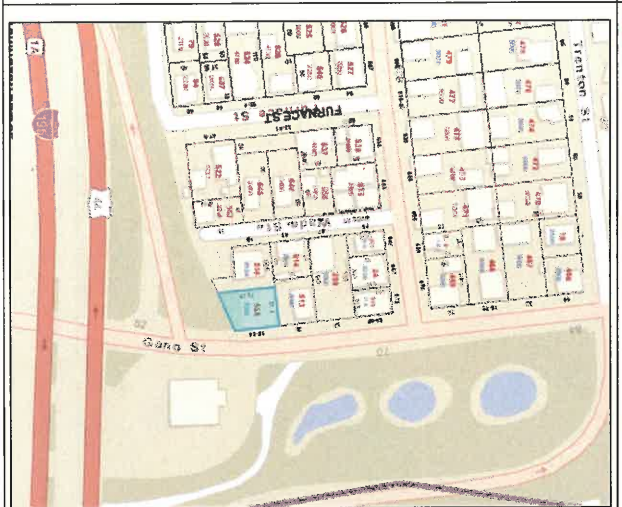
ID	Address	Owner	Owner Address	Lot ID	Map
G	673 Wickenden Street	Peter Culp	153 Albert Ave Cranston, RI 02905	Plat 17 Lot 510	
H	47 Wade Street	Alfonso Jose Manuel	128 BROOK ST PROVIDENCE, RI 02906-1006	Plat 17 Lot 259	

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COASTAL RESOURCES MANAGEMENT COUNCIL

List of Abutting Property Owners (Continued)


ID	Address	Owner	Owner Address	Lot ID	
I	60 Gano Street	Reservoir Adventures LLC	1 Richmond Sq, Providence, RI 02906	Plat 17 Lot 513	
J	54 Gano Street	Peter Culp	153 Albert Ave Cranston, RI 02905	Plat 17 Lot 555	

List of Abutting Property Owners (Continued)

ID	Address	Owner	Owner Address	Lot ID	
K	271 Tockwotten Street, Providence, RI	271 Tockwotten Partners LLC	40 Fulton St., New York, NY 10038	Plat 17 Lot 658	
L	250 India Street, Providence, RI	Brown University	PROSPECT ST PROVIDENCE, RI 02906	Plat 17 Lot 54	

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 APR 11 2022
 COASTAL RESOURCES
 MANAGEMENT COUNCIL

List of Abutting Property Owners (Continued)

ID	Address	Owner	Owner Address	Lot ID	
-	No data				

Note: All proposed Gano Street and Blackstone River Bikeway Relocation work will occur within State-owned property, as somewhat indicated in the graphic above.

**Appendix E – Minutes of April 27, 2020
Consultation Meeting and October 13,
2021 Pre-Application Meeting**



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**Meeting Minutes RIDOT I-195 Washington Bridge Design-Build
Consultation – Stormwater Management**

Meeting held via Webex Conference Call on April 27, 2020

Meeting Participants

Anthony Pompei, RIDOT
Brian Moore, RIDOT
Corey Richard, AECOM
Kate Mignone, AECOM
Joe Skymba, AECOM

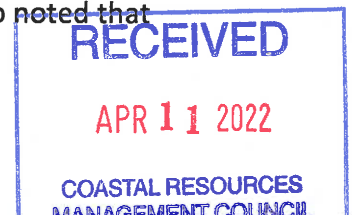
Richard Lucia, CRMC
David Reis, CRMC
Chuck Horbert, RIDEM – Water Resources
Neal Personeus, RIDEM – Water Resources
Joseph Antonio, RIDEM-OCTA
Ron Gagnon, RIDEM – OCTA

Purpose of the Meeting

The RIDOT has issued a Request for Proposals (RFP) for the Design-Build of the I-195 Westbound Washington Bridge. The project will include rehabilitation and widening of the bridge that spans the Seekonk River as well as a new off-ramp from I-195 westbound to Waterfront Drive in East Providence and a new Gano Street on. The purpose of this meeting was to review the requirements for the stormwater management plan.

Meeting Minutes

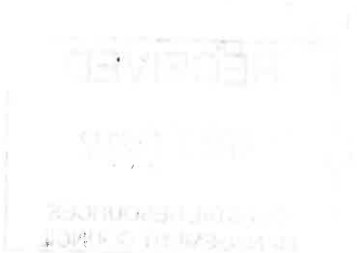
- The project will extend from approximately the Broadway Street off-ramp to the South Main Street off-ramp and will include re-striping and widening of the Washington Bridge to accommodate additional travel lanes along this corridor. A new off-ramp to Waterfront Drive will be constructed. A new on-ramp on Gano Street to 195 West will be constructed with the new entrance parallel to the existing off-ramp.
- AECOM noted that an analysis of the existing stormwater basins indicates that there is sufficient capacity to add to the existing treatment system. CRMC noted that the design consultant should review the previous permitting files for the original design capacity of this system. CRMC indicated that Application Number 2001-12-18 be reviewed and noted that there were 18 modifications to this application that should also be reviewed.
- DEM noted that the maintenance record for the pond system should be reviewed to determine if the original treatment capacity is still available. CRMC also noted that



compliance with the construction requirements of the basins be confirmed to ensure that the full treatment capacity was provided.

- It was noted that a new BMP will be provided on Gano Street partially under the proposed on-ramp and adjacent to the existing treatment pond system. A new BMP at the Waterfront Drive off-ramp will also be provided. CRMC noted that shading impacts from the existing and proposed structures could impact vegetative growth and the treatment capacity of the BMPs. The application should address these impacts and provide justification for the treatment calculations based on this condition. A stormwater credit may be provided through the removal of Valley Street and replacing with a grass paver system.
- AECOM indicated that approximately 520,000 square feet of roadway is proposed for mill and overlay (no added stormwater treatment required), 68,000 square feet will be full depth reconstruction (50% water quality treatment required) and new pavement will be added on the bridge deck and in areas of the proposed widening (100% water quality treatment required). DEM noted that the water quality treatment design may need to include additional treatment for impairments associated with the Seekonk River in this area.
- The CRMC indicated that the application should indicate the water quality treatment requirements to meet the stormwater regulations and what is proposed to meet the RIDOT Consent Agreement requirements. It was noted that water quality treatment offsets may be needed to meet the Consent Agreement requirements.

To facilitate review of the permit applications, please include a copy of these notes with your application submittal. This meeting summary does not relieve the property owner from his/her obligation to obtain any local, state, or federal approvals or permits required by ordinance or law.



**Washington Bridge Project Meeting
10/13/2021**

Amy Silva, Rich Lucia – CRMC

Neal Personeus – DEM

Jeff Klein, Scott Hobson, Rich Rhodes, Brian Blackerby – VHB

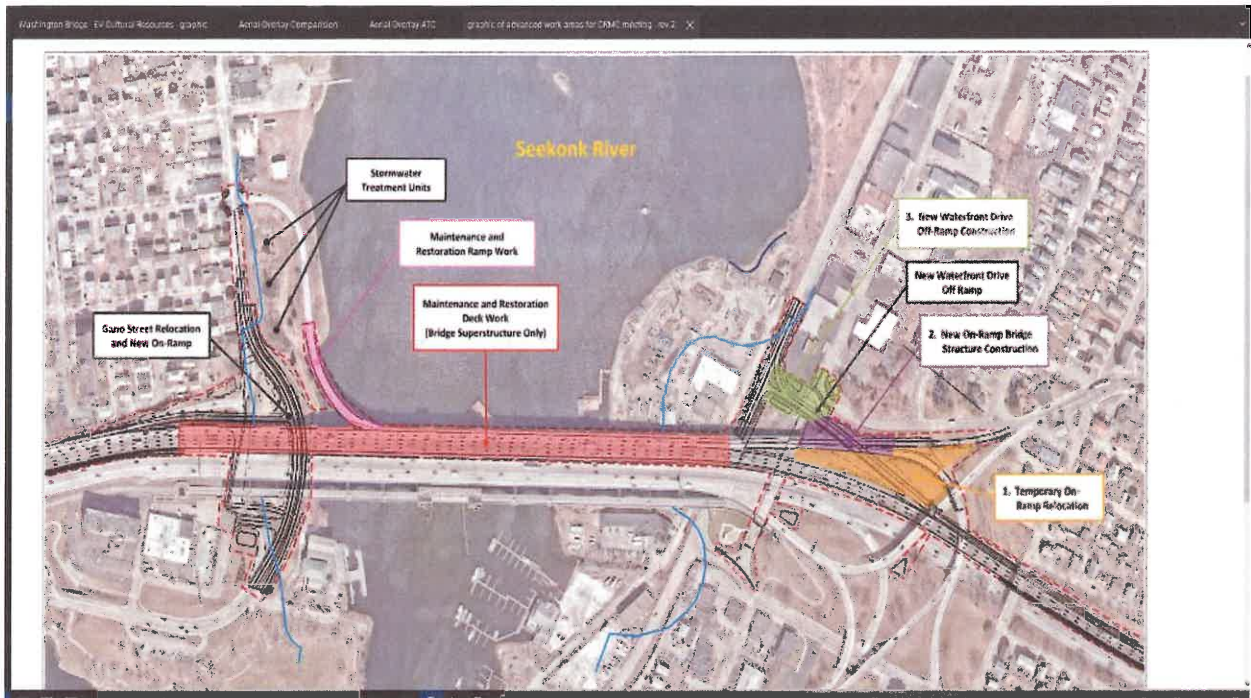
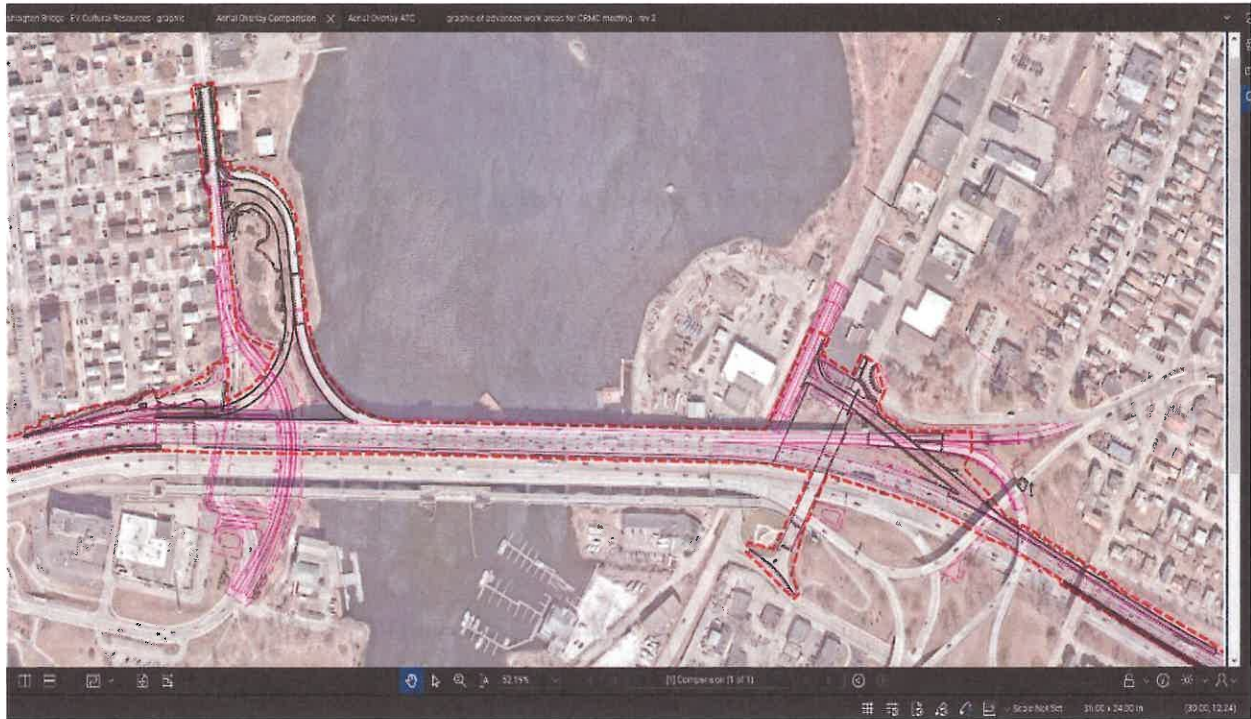
Alisa Richardson, Erik Johnston, Louis Maccarone, Anthony Pompeii – DOT

- Update on changes from previous design plan
 - No more in water impacts. All work on upland
- Maintenance of existing bridge decking and Gano St offramp:
 - Milling one lane at a time
 - Repair concrete and joints as needed
 - Re-pave
 - ?RL- Stormwater management for this?
 - Existing Gano St basins?
 - AR: Stormwater for this will be part of the larger Assent/project
- Definitely CRMC Category B, per the Activity Matrix
- Consider splitting off deck Maintenance as initial permit, adding the stormwater later.
- Discuss EP side, Steps 1, 2, 3.
 - With the exception of Waterfront Drive, all work is out of CRMC Jurisdiction (OOJ)
 - Waterfront drive would be the very end of the work
- Consider removing Waterfront Drive to the larger Gano St. relocation project.
 - Doing this would allow DEM to do a RIPDES permit for OOJ work if 1acre or more.
 - Temporary stormwater with the stormwater part of the larger Cat B Gano St/Waterfront Dr.

Conclusion:

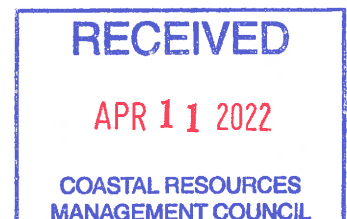
- File Maintenance Assent with CRMC for the work on the bridge and Gano st offramp.
 - Maint Assent will cite that stormwater will be part of larger project
- Waterfront Drive work will be part of CatB Gano St relocation work.
- Steps 1, 2, 3 in East Providence can be done without CRMC permitting.
 - Possibly requiring DEM RIPDES.
- Submit Category B Assent Application to CRMC for full stormwater for whole project area, plus Waterfront Drive upgrades and Gano St relocation.





11/15/2023
11/15/2023
11/15/2023

Appendix F – CRMC Coastal Hazard Application Worksheet and Memorandum



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RICRMC COASTAL HAZARD APPLICATION WORKSHEET

APPLICANT NAME: Rhode Island Department of Transportation

PROJECT SITE ADDRESS: Washington Bridge (RIDOT Bridge No. 700) at Seekonk River

STEP 1. PROJECT DESIGN LIFE

- A. For properties in a FEMA-designated **A**, or **X** Zone, provide the first floor elevation (FFE) of the proposed structure referenced to NAVD88, **OR** For properties in a FEMA-designated **V** or **Coastal A** Zone, please provide the elevation of the lowest horizontal structural member (LHSM) referenced to NAVD88. FFE OR ft
LHSM elevation 23 ft
- B. How long do you want your project to last? Identify the expected design life for the project (CRMC recommends a **minimum of 30 years**) Design Life: 75 yrs
- C. Add the number of years you identified in 1B to the current year. Design Life Year: 2097

D. **CHECK** beneath the sea level rise (SLR) projection that matches or comes closest to project design life year.

Year	2030	2040	2050	2060	2070	2080	2090	2100
SLR	1.47	2.13	3.05	4.00	5.15	6.49	7.94	9.41
	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Source: Sea Level Rise (SLR) Projections (Feb. 2017). NOAA High Curve, 83% Confidence Interval. Newport, RI Tide Gauge. All values are expressed in feet relative to NAVD88. <http://www.corpsclimate.us/ccaces/curves.cfm>

NOTE: The STORMTOOLS sea level rise scenarios depict how high the water will be above the average height of the daily high tide over the 19-year period between 1983 and 2001. There have been between 4 and 5 inches of sea level rise in Rhode Island since then. The higher modeled water level accounts for the uncertainties in ice sheet and ocean dynamics.

STEP 2. SITE ASSESSMENT

- A. Open *RICRMC Coastal Hazard Mapping Tool*. Following the tutorial along the left side of the screen, enter the project site address and turn on the sea level layer closest to the number you circled in 1D.
- B. **ENTER** the STORMTOOLS SLR map layer closest to the SLR value you checked in Step 1D above. If the value falls between the available STORMTOOLS SLR map layers, round to the closest of these sea level rise (SLR) numbers: 1ft, 2ft, 3ft, 5ft, 7ft, 10ft, or 12ft 10 ft
- C. Does the STORMTOOLS SLR map layer you circled above expose your project site to future tidal inundation? **CHECK YES or NO** YES
 NO
- D. List any **roads or access routes** that are potentially inundated from SLR. To do this, ZOOM OUT from your project location, change BASEMAP on the viewer to "street view" – see Step 2A.

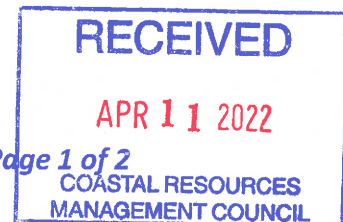
Gano Street, Waterfront Drive, Water Street, Valley Street

****Please be advised that CRMC staff may also review the implications of sea level rise in combination with nuisance storm flooding and discuss these potential project concerns with the applicant. Nuisance flooding impacts may be viewed in STORMTOOLS [here](#).**

STEP 3. STORMTOOLS DESIGN ELEVATION (SDE)

- A. Select your SLR Scenario using the tabs along the top of the online map (*NOTE: RECOMMENDED scenario is 100-year storm plus 3-feet of sea level rise*). Follow the tutorial included along the left panels of the viewer to enter the address of your project site. Select the tab across the top that corresponds to the sea level rise projection you identified in STEP 1. Enter your address on the map, and then click on the project site to identify **STORMTOOLS Design Elevation (SDE)** from the pop-up box. **Enter the SDE value:**

26-38 ft



RICRMC COASTAL HAZARD APPLICATION WORKSHEET

STEP 4. SHORELINE CHANGE

A. Using the [CRMC Shoreline Change maps](#), indicate the transect number closest to your site, and erosion rate listed for that transect. **NOTE: Transects are not available for every site. If this is the case, please enter N/A.**

Transect Number: 1150, 1000, 999
Erosion Rate: N/A **ft/year**

B. CHECK below the Projected Erosion Rate that corresponds to the design life you identified above.

Year	2050	2060	2070	2080	2090	2100
Projected Future Erosion Multiplier	1.34	1.45	1.57	1.70	1.84	2.00
	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Source: Projected Shoreline Change Rate multipliers. (Oakley et al., 2016)

C. COMPLETE EROSION SETBACK CALCULATION:

Historic shoreline change rate, STEP 4A	Design Life, STEP 1B	Projected Future Erosion Multiplier, STEP 4B	Erosion Setback (ft) 4A x 1B x 4B
X	X	=	N/A

NOTE: Setbacks are required per the [CRMC Red Book, Section 1.1.9](#). A minimum setback of 50-feet is required, but a greater setback may be necessary and/or desirable based on this analysis.

STEP 5. CER I & OTHER SITE CONSIDERATIONS

A. If you live in a community where a Coastal Environmental Risk Index (CERI) has been completed (Barrington, Bristol, Charlestown, Narragansett, South Kingstown, Warren, Warwick, Westerly), CHECK the level of projected damage to your location, as indicated on the map that corresponds to the design life identified in STEP 1.

CERI Level: Moderate High Severe Extreme Inundated by 2100 Not applicable

B. Consider and discuss with your design consultant other forces or factors that might impact the development, such as coastal habitats, shoreline features, public access, wastewater, storm water, depth to water table/groundwater dynamics, saltwater intrusion, or other issues not listed above. In addition, pressure from rising sea levels will result in rising subsurface groundwater levels ultimately effecting wells and septic systems.

STEP 6. LARGE PROJECTS

This step is for Large Projects and Subdivisions only, six (6) or more units, as defined by the [CRMC Red Book Section 1.1.6.I\(1\)\(f\)](#). This step may be skipped for other projects.

A. Use the Sea Level Affecting Marshes Model (SLAMM) Maps to assess potential impacts to large projects and subdivisions from salt marsh migration resulting from projected sea level rise. CRMC SLAMM maps can be accessed [here](#). The CRMC recommends using the 5-foot SLR projection within SLAMM to assess future potential project impacts on migrating marshes. Does the SLAMM map that corresponds to the design life you identified in STEP 1 expose your project site to future salt marsh migration? CHECK YES or NO

YES NO

STEP 7: DESIGN EVALUATION

A. Using Chapter 7 of the RI Shoreline Change SAMP as a guide, investigate mitigation options for the exposure identified above and include that in the final application.

This fully completed Coastal Hazard Application Guidance worksheet must accompany the application. If you are a design or engineering professional, please print and sign here that you have discussed the findings of this worksheet with the Owner.

DESIGN/ENGINEER SIGNATURE: Jeffrey T. Klein

DATE: 3/8/2022

OWNER'S SIGNATURE: Alvin R. Riker

DATE: 3/8/2022

To: Scott Hobson

Date: 02/22/2022

Memorandum

Project #: 73133.01 Washington Bridge

From: Carissa Mills

Re: Coastal Hazard Worksheets

Introduction

Elements of the proposed Project include rehabilitation of RIDOT Bridge No. 700, the addition of a new through lane on the western end of the Bridge, construction of a new Gano Street On-Ramp in Providence, construction of a new Waterfront Drive Off-Ramp in East Providence, and restriping of I-195 westbound from the Broadway Street overpass to the new Waterfront Drive Off-Ramp to accommodate four lanes of highway through traffic.

When considering sea level rise (SLR) impacts to public roads, CRMC would like to see analysis done for NEW construction. Modification to existing roads do not seem to be a trigger for the Coastal Hazard Application.



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Engineers | Scientists | Planners | Designers

1 Cedar Street, Suite 400, Providence, Rhode Island 02903

P 401.272.8100

F 401.277.8400

www.vhb.com

COASTAL RESOURCES
MANAGEMENT COUNCIL

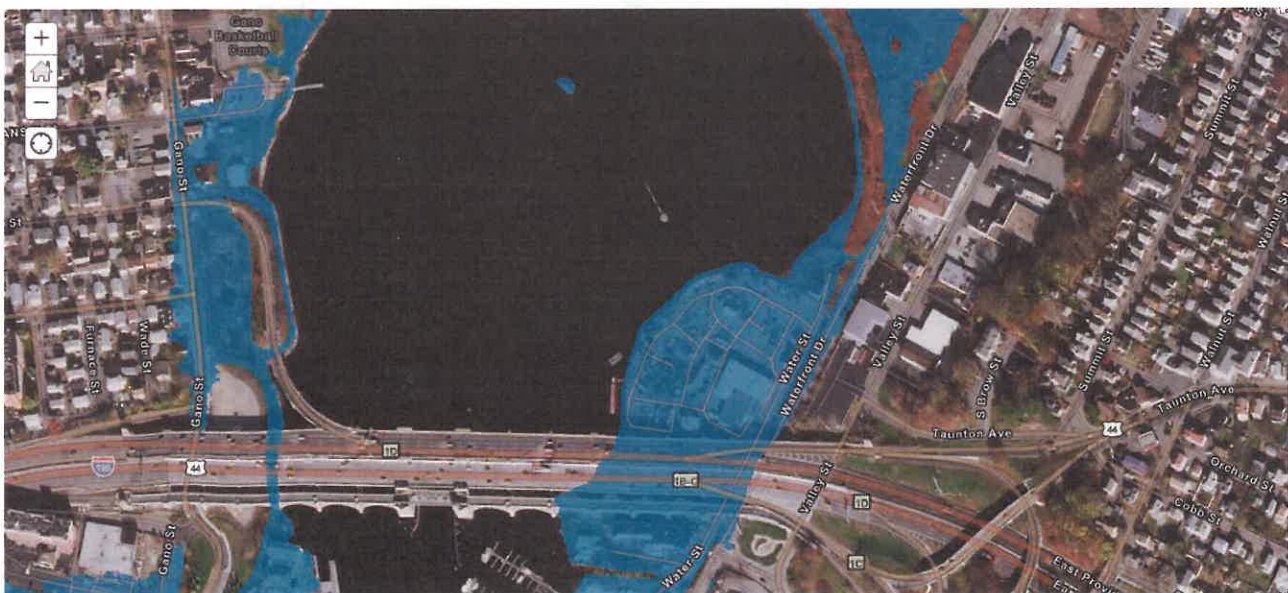
Methodology

The Project does span a VE flood zone on either side of the Seekonk River. The re-milling area north of the bridge on Waterfront Drive is located in an X flood zone. The new Waterfront Drive Off-Ramp and new On-Ramp are not located in a Special Flood Hazard Area (A, AE or VE flood zones).



FEMA Flood Map

The design life of the Washington Bridge is 25 years but the design life for the new construction at Gano Street is 75 years. I used that to calculate the project should last until the year 2097 (2022 + 75). In 2097 (round up to 2100), we expect 9.41 feet (round up to 10 feet) of SLR. This is what 10 feet of SLR looks like at the Project location.



10 feet of Sea Level Rise (Year 2100)

This SLR scenario does expose the project site to future tidal inundation; but it does not fully encroach the new Waterfront Drive on-ramp or off-ramp. Nor does it impact the area further up on Waterfront Drive. The new through lane on the western edge of the bridge should be elevated enough to stay dry. The new Gano Street On-Ramp will be impacted by 10-feet of SLR. I chose to focus on this project component for the Coastal Hazard Application Worksheet.

Roads and access routes that may be inundated from 10 feet of SLR include Gano Street, Waterfront Drive, and Water Street.

Future Storm Conditions + SLR

Next, I looked at the Project Area under 10 feet of SLR and storm surge from a 100-year storm. Clicking on various parts of the resulting map provided the water elevation during one of these future, Perfect Storms. The storm surge elevation (STORMTOOLS Design Elevation) for the project ranged from approximately 26-38 feet. See figure below.



10 feet of SLR plus storm surge from a 100-year storm.

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Shoreline Change

The CRMC maps do not provide a rate of erosion (yellow numbers in the figure below) for the Project Area. The nearest transects are 1150, 1000, and 999. If there is no documented erosion rate, there is no additional erosion setback requirement.

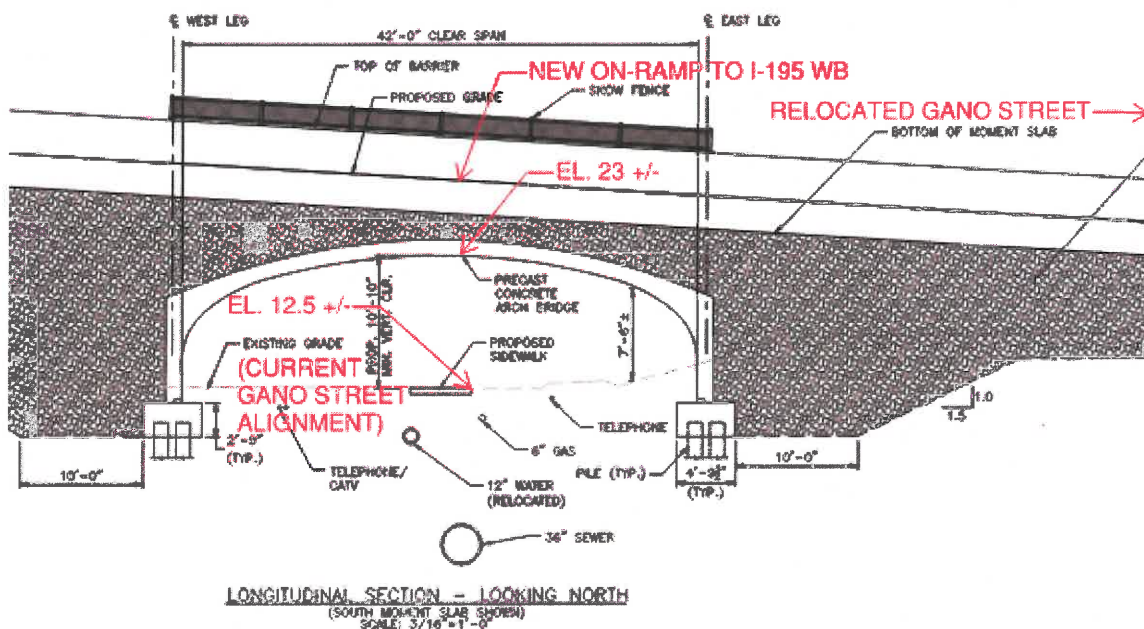


CRMC Shoreline Change Map. Annual erosion rates in yellow.

REVISED
NOV 1
DATE: 11/16/2021
10:30 AM

Conclusion

The Gano Street On-Ramp will be the project component most impacted by 10 feet of sea level rise. Parts of the road will be at grade but others will be elevated. The lowest horizontal structural member, the underside of the new span that will go over the current Gano Street alignment, is estimated to be about 23 feet in elevation.



The 10 feet of SLR coupled with storm surge will impact at-grade project elements at Valley Street and Waterfront Drive.

Storm surge coupled with 10 feet of SLR will restrict access to the Washington Bridge from both the east and the west. Adaptation strategies and techniques are limited for this bridge rehabilitation project. Parts of the new Gano Street alignment will be elevated through grading to better protect the low-lying road. This will reduce initial road flooding caused by sea level rise.



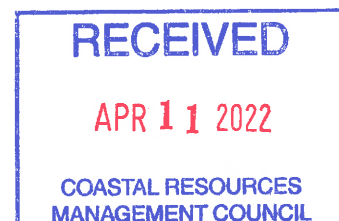
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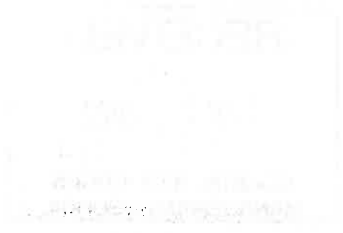
1997

LIBRARY

Appendix G – RIDEM Remedial Approval Letter



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RHODE ISLAND
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF LAND REVITALIZATION & SUSTAINABLE MATERIALS MANAGEMENT
235 Promenade Street, Providence, Rhode Island 02908

REMEDIAL APPROVAL LETTER
File No. SR-28-1386

December 9, 2021

Alisa Diaz Richardson, MS, PE, PMP
Managing Engineer
Natural Resources Unit
360 Lincoln Avenue
Warwick, RI 02888

RE: DOT Washington Bridge #700 Improvements Project
Providence and East Providence
Rhode Island

Dear Ms. Richardson:

Effective April 22, 2020, the Rhode Island Department of Environmental Management's (the Department) Office of Waste Management has changed the office name to the Office of Land Revitalization and Sustainable Materials Management (LRSMM), as reflected in the re-codified 250-RICR-140-30-1, Rules and Regulations for the Investigation and Remediation of Hazardous Material Releases (the Remediation Regulations). The purpose of these regulations is to create an integrated program requiring reporting, investigation, and remediation of contaminated sites in order to eliminate and/or control threats to human health and the environment in a timely and cost-effective manner. A Remedial Approval Letter (RAL) is a document used by the Department to approve remedial actions at contaminated sites that do not involve the use of complex engineered systems or techniques (e.g. groundwater pump and treat systems, soil vapor extraction systems, etc.).

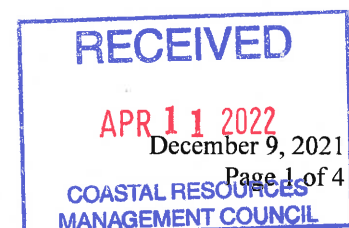
In the matter of the above-referenced property (the Site), the Department's Office of LRSMM is in receipt of the following documentation submitted pursuant to the Remediation Regulations in response to the reported release at the Site:

1. **DOT Washington Bridge #700 Improvements Project**, received by the Department on December 3, 2021, and prepared by VHB, Inc.

This document fulfills the requirements of Section 1.9 (Risk Management) and Section 1.10 (Remedial Action Work Plan (RAWP)) of the Remediation Regulations.

The preferred remedial alternative involves management of contaminated soil and groundwater during the construction-phase of the Washington Bridge No. 700 Improvements Project in Providence and East Providence, Rhode Island.

DOT Washington Bridge #700 Improvements, Providence & East Providence
Remedial Approval Letter



Page 1 of 4

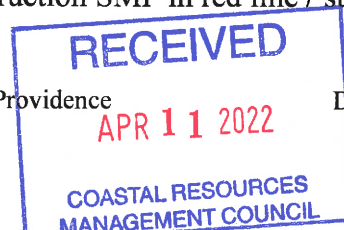
Based upon review and consideration of the above referenced documents, the Department approves the Remedial Action Work Plan (RAWP) through this RAL provided that:

1. All work must be performed in accordance with all applicable regulations and the Department approved RAWP.
2. Start of the work described in the Department approved RAWP must be initiated within six (6) months of issuance of this RAL.
3. Prior to initiating any remedial activities, the Department shall be provided with a list of all contractors, and their respective contact information, that will be used on Site to complete the remedial work described in the Department approved RAWP. The Department shall be notified, when feasible, a minimum of five (5) working days in advance of any changes in contractors and/or consultants involved with the remedial work on this Site. The notification must be promptly supplied in writing with complete contact information for each new contractor or consultant (including but not limited to company name and address, contact name and address, contact telephone number and e-mail address).
4. All excavated regulated soil, if not approved for encapsulation onsite, shall be disposed of off-site at an appropriately licensed disposal facility in accordance with all local, State, and Federal laws. Copies of the material shipping records and manifests associated with the disposal of the material shall be included along with the Closure Report.
5. Areas of the site where contaminated soils are to be excavated must be staged and temporarily stored in a designated area, as proposed in the RAWP, of the site with proper polyethylene covers. Any stockpiled materials, including clean fill, must be underlain and covered with polyethylene sheeting and be secured at the end of each day with all appropriate erosion and sediment controls to limit the loss of the cover and protect against stormwater and wind erosion (i.e. hay bales, rocks, silt fencing). These appropriate sedimentation and erosion controls must be in place and in proper working order at all times until all disturbed areas are stabilized and capped as proposed. Within reason, the storage location will be selected to limit the unauthorized access to the materials (i.e. away from public roadways/walkways). No regulated soil will be stockpiled on-site for greater than thirty (30) days. In the event that stockpiled soils pose a risk or threat of leaching hazardous materials, a proper leak-proof container (i.e. drum or lined roll-off) or secondary containment will be required and utilized.
6. The Office of LRSMM no longer requires the submittal of analytical data prior to clean fill being brought to a Site. It is the sole responsibility of the Performing Party and their consultant to analyze the material, certify that the material meets the Department's Residential Direct Exposure Criteria (RDEC), as defined by the Remediation Regulations, for all constituents, and is suitable for use on the Site. The Office of LRSMM strongly suggests that enough representative samples of the clean fill are collected prior to moving the material to the Site to satisfy the Performing Party and their consultant that the material meets the RDEC. Please note that the Office of LRSMM reserves its rights to sample the fill, if suspect, to confirm compliance with the RDEC.

7. All regulated soil remaining onsite shall be encapsulated by an engineered control consistent with those described in the Department approved RAWP.
8. Dust suppression techniques (i.e. watering) must be employed at all times during all soil disturbing/handling activities at the site in order to minimize the generation of fugitive dust.
9. Please note that if soil exceeding the Department's Residential Direct Exposure Criteria (RDEC) is to remain onsite then a draft Environmental Land Usage Restriction (ELUR) and Soil Management Plan (SMP) must be submitted to the Office of LRSMM for review and approval prior to recording.
10. Within sixty (60) days of completion of the work described in the Department approved RAWP, a Closure Report detailing the remedial action and including any disposal documentation shall be submitted to the Office of LRSMM.
11. Within sixty (60) days of completion of the work described in the Department approved RAWP, the final Department approved ELUR shall be recorded in the City of Providence and the City of East Providence Land Evidence Records for the properties and a stamped, certified copy returned to the Department within fifteen (15) days of recording. Upon receipt of a copy of the recorded (stamped) ELUR, the Office of LRSMM will issue a Letter of Compliance.
12. Following recording of the ELUR, the site shall be maintained and annually inspected to evaluate the compliance status of the site with the ELUR. Within thirty (30) days of each annual inspection, an evaluation report shall be prepared and submitted to the Office of LRSMM detailing the findings of the inspection and noting any compliance violations at the site.
13. Any changes in the activities detailed in the RAWP shall be reported to the Office of LRSMM by telephone within one (1) working day and in writing within five (5) business days.
14. The Office of LRSMM shall be notified forty-eight (48) hours prior to initiating the remedial activities at the site associated with the Department approved RAWP.
15. The Office of LRSMM shall be immediately notified of any site or operation condition that results in non-compliance with this RAL.

At this time, the Office of LRSMM offers its concurrence with the proposed remedial action for the property. The Department approves the RAWP provided that all activities and procedures detailed in the RAWP are strictly adhered to. Furthermore, this letter continues to place primary responsibility for the construction, operation, maintenance, and monitoring of the approved RAWP and its associated implementation on RIDOT. As the Responsible Party and Performing Party, RIDOT is expected to implement the RAWP in an expeditious and professional manner that prevents non-compliance with this RAL and said RAWP and is protective of human health and the environment.

Please note that at this time the Department does not approve the ELUR for recording in the Land Evidence Records with the City of Providence and City of East Providence. Please forward an electronic version of the draft ELUR and the post-construction SMP in red line / strikeout format



for Department review and approval. The draft ELUR and SMP shall be reviewed and approved by the Department, followed by recording of the approved ELUR, at the completion of all remedial work.

This RAL does not remove your obligation to obtain any other necessary permits from other local, State, or Federal agencies.

If you have any questions regarding this letter or would like the opportunity to meet with Department personnel, please contact me by telephone at (401) 222-2797, NEW ext. 2777102, or by E-mail at jeff.crawford@dem.ri.gov.

Sincerely,



Jeffrey Crawford, Project Manager
Principal Environmental Scientist
Office of Land Revitalization &
Sustainable Materials Management

Authorized by,



Kelly Owens
Supervising Engineer
Office of Land Revitalization &
Sustainable Materials Management

Cc: Erik Johnstone, RIDOT
Lou Maccarone, RIDOT
Fred Bevens, VHB, Inc.
Peter Grivers, VHB, Inc.

Appendix H – § 106 Programmatic Agreement and Updated § 106 and § 4(f) Determinations



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RECEIVED
MAY 11 2011
COASTAL RESOURCES
MANAGEMENT COUNCIL

PROGRAMMATIC AGREEMENT

By and Among the
Federal Highway Administration

the

Rhode Island Department of Transportation

and the

Rhode Island Historic Preservation and Heritage Commission

Regarding

Archeological Monitoring Requirements during Construction for the I-195 Washington North Phase 2 Project – Providence and East Providence, Rhode Island

This Programmatic Agreement (hereinafter PA) is entered into by and among the United States Department of Transportation, Federal Highway Administration (hereinafter FHWA), with its Rhode Island Division Office located at 380 Westminster Street, Suite 601, Providence, Rhode Island 02903, the Rhode Island Department of Transportation (hereinafter RIDOT), with its principal office located at Two Capitol Hill, Providence, Rhode Island 02903, the Rhode Island Historical Preservation and Heritage Commission (hereinafter RIHPHC), located at 150 Benefit Street, Providence, RI, 02903, and the Blackstone Heritage Corridor, Inc. (hereinafter BHCI), located at 670 Linwood Avenue, Whitinsville, MA, 01588-(the foregoing entities hereinafter referred to collectively as the Signatories).

WHEREAS, the Narragansett Indian Tribal Historic Preservation Officer (NITHPO) has been consulted on this project and invited to sign this PA as an Invited Signatory; and

WHEREAS, The I-195 Washington Bridge North Phase 2 Project includes plans for traffic and safety improvements which can reduce emissions associated with the Washington Bridge that connects the Cities of Providence and East Providence over the Seekonk River. Specifically, on the west side of the Seekonk River the Project plans to replace the existing Gano Street I-195 On- ramp with an on-ramp with an improved merge onto the westbound lane of I-195 and create a turning lane on Gano Street to improve local traffic flow. On the east side of the Seekonk River, RIDOT is planning to create an off-ramp connecting the west bound lanes of I-195 with Waterfront Drive. The Project will also include temporary and permanent impacts related to demolition and construction of the on and off ramps. These improvements are intended to promote local and highway safety as well as improve general traffic flow in the City of Providence and the City of East Providence; and

WHEREAS, The I-195 Washington North Phase 2 Project is an Undertaking as defined in 36 C.F.R. Part 800.16(y) as a project, activity, or program funded in whole or in part under the direct or indirect jurisdiction of a Federal agency including those carried out by or on behalf of a Federal agency; those carried out with Federal financial assistance; and those requiring a Federal permit, license or approval; and



WHEREAS, FHWA is required to comply with the National Historic Preservation Act of 1966, as amended (16 U.S.C. 470), and its implementing regulations found at 36 C.F.R. Part 800 as promulgated by the Advisory Council on Historic Preservation (ACHP), the Archaeological Resources Protection Act of 1979 (ARPA) (16 U.S.C.470 aa-mm), the National Environmental Policy Act (NEPA) (42 U.S.C. 4321 *et seq.*), and the Native American Graves Protection and Repatriation Act (NAGPRA) (25 U.S.C. 3001 *et seq.*) (collectively the Acts); and

WHEREAS, FHWA is operating in accordance with 36 CFR 800.4 (b)(2) - *Phased identification and evaluation*; and

WHEREAS, FHWA has determined that the undertaking may have an adverse effect on potential historic archaeological resources, and has consulted with the Rhode Island State Historic Preservation Officer (SHPO), the Blackstone Heritage Corridor, Inc. and the Narragansett Tribal Historic Preservation Officer (THPO) pursuant to 36 CFR Part 800, the regulations implementing Section 106 of the National Historic Preservation Act (54 U.S.C. § 306108); and

WHEREAS, RIDOT is responsible for administering and managing the design and construction of transportation projects funded under the Federal Aid program in accordance with FHWA requirements; and

WHEREAS, there is a moderate to high potential that historic archaeological resources (Areas W1, W5, E3 and E1) of significance may be discovered within the limits of disturbance in the I-195 Washington North Phase 2 Project (see Appendix II, Figures 1 and 2 for archaeological sensitive areas). Historic and modern demolition and development and fill episodes have limited the integrity of any remaining Native American cultural deposits at the interface between naturally deposited horizons and fill horizons, indicating a low potential; and

WHEREAS, it is the opinion of RIDOT that, due to the constraints on traditional archaeological survey and the presumed discontinuity of any remaining intact deposits, archaeological monitoring is necessary to observe the construction within the limits of disturbance in the Project area at sites or in areas of moderate to high historic period archaeological sensitivity, where any subsurface excavation will take place, in accordance with the scope of work attached hereto and incorporated herein as part of this PA; and

WHEREAS, for the purposes of Section 106 review, the "area of potential effect" includes the construction impact areas and those properties abutting the construction impact areas (see Appendix II, Figure 3); and

WHEREAS, the Signatories and Invited Signatories wish to enter into a PA to comply with the requirements of these Acts.

NOW THEREFORE, FHWA, RIDOT, RIHPHC, BHCI, and NITHPO hereby agree that the undertaking shall be implemented in accordance with the following stipulations to take into account the effect of the undertaking upon documented areas of archaeological significance:

1. Archaeological Monitoring

The Signatories and Invited Signatory shall ensure that archaeological monitoring is performed within the limits of disturbance in the I-195 Washington North Phase 2 Project at sites or in areas of sensitivity where subsurface excavation will take place.

- A. The above-named Signatories and Invited Signatories shall ensure that specific protocols will be followed should potentially significant archaeological resources or human remains be disturbed during construction activities. These protocols will be determined by a consensus among the above-named Signatories and Invited Signatories (See Appendix I).

2. Post-Review Discoveries

If archaeological resources, human remains, or any properties are discovered that may be historically significant or unanticipated effects on historic properties or archaeological resources of interest to the Narragansett Indian Tribe found, RIDOT shall implement the archaeological discoveries plan outlined in the monitoring protocols included in Appendix I of this PA, and a Section 106 Adverse Effect Determination will be issued in conjunction with a Memorandum of Agreement (MOA).

3. Amendments

This PA may be amended when such an amendment is agreed to in writing by all signatories. The amendment will be effective on the date a fully signed copy is filed with the ACHP.

4. Duration

This PA will expire if its terms are not carried out within five (5) years from the date of its execution. Prior to such time, FHWA may consult with the other signatories to reconsider the terms of the PA and amend it in accordance with Stipulation 3 above.

5. Dispute Resolution

Should any signatory to this PA object at any time to any actions proposed or the way the terms of this PA are implemented, FHWA shall consult with such party to resolve the objection. If FHWA determines that such objection cannot be resolved, FHWA will:

- A. Forward all documentation relevant to the dispute, including the FHWA's proposed resolution, to the ACHP. The ACHP shall provide FHWA with its advice on the resolution of the objection within thirty (30) days of receiving adequate documentation. Prior to reaching a final decision on the dispute, FHWA shall prepare a written response that considers any timely advice or comments regarding the dispute from the ACHP, signatories and concurring parties, and provide them with a copy of this written response. FHWA will then proceed according to its final decision.



B. If the ACHP does not provide its advice regarding the dispute within thirty (30) days, FHWA may make a final decision on the dispute and proceed accordingly. Prior to reaching such a final decision, FHWA shall prepare a written response that considers any timely comments regarding the dispute from the signatories and concurring parties to the PA and provide them and the ACHP with a copy of such written response.

C. FHWA's responsibility to carry out all other actions subject to the terms of this PA that are not the subject of the dispute remain unchanged.

6. Termination

If any signatory to this PA determines that its terms will not or cannot be carried out, that party shall immediately consult with the other signatories to attempt to develop an amendment per Stipulation 4 above. If within thirty (30) days (or another time period agreed to by all signatories) an amendment cannot be reached, any signatory may terminate the PA upon written notification to the other signatories.

Once the PA is terminated, and prior to work continuing on the undertaking, FHWA must either (a) execute a PA pursuant to 36 CFR § 800.6 or (b) request, take into account, and respond to the comments of the ACHP under 36 CFR § 800.7. FHWA shall notify the signatories as to the course of action it will pursue.

Execution of this PA by the FHWA and the SHPO and implementation of its terms evidence that FHWA has considered the effects of this undertaking on historic properties and afforded the ACHP an opportunity to comment.

7. Communication

All opinions, comments, and notifications by the parties shall be transmitted by email with U.S. Mail, first class postage delivery or hand-delivery to follow.

IN WITNESS THEREOF, FHWA, RIDOT, RIHPHC, BHCI and NITHPO through their duly authorized representatives have executed this Programmatic Agreement as of the date last written below.

SIGNATORIES:

FEDERAL HIGHWAY ADMINISTRATION

**CARLOS C
MACHADO**

Digitally signed by CARLOS C
MACHADO
Date: 2021.07.29 07:48:35 -04'00' Date:

Carlos Machado, Division Administrator

RHODE ISLAND DEPARTMENT OF TRANSPORTATION

_____ Date:
Peter Alviti, Jr., Director

RHODE ISLAND HISTORICAL PRESERVATION AND HERITAGE COMMISSION

_____ Date:
J. Paul Loether, Executive Director/SHPO

BLACKSTONE HERITAGE CORRIDOR, INC.

_____ Date:
Devon Kurtz, Executive Director



IN WITNESS THEREOF, FHWA, RIDOT, RIHPHC, BHCI and NITHPO through their duly authorized representatives have executed this Programmatic Agreement as of the date last written below.

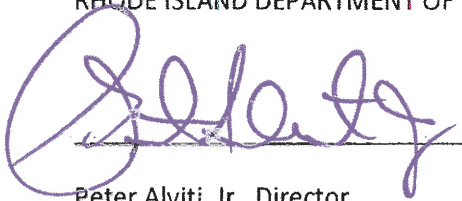
SIGNATORIES:

FEDERAL HIGHWAY ADMINISTRATION

Carlos Machado, Division Administrator

Date:

RHODE ISLAND DEPARTMENT OF TRANSPORTATION



Peter Alviti, Jr., Director

Date: 7/28/21

RHODE ISLAND HISTORICAL PRESERVATION AND HERITAGE COMMISSION

J. Paul Loether, Executive Director/SHPO

Date:

BLACKSTONE HERITAGE CORRIDOR, INC.

Devon Kurtz, Executive Director

Date:

IN WITNESS THEREOF, FHWA, RIDOT, RIHPHC, BHCI and NITHPO through their duly authorized representatives have executed this Programmatic Agreement as of the date last written below.

SIGNATORIES:

FEDERAL HIGHWAY ADMINISTRATION

Carlos Machado, Division Administrator

Date:

RHODE ISLAND DEPARTMENT OF TRANSPORTATION

Peter Alviti, Jr., Director

Date:

RHODE ISLAND HISTORICAL PRESERVATION AND HERITAGE COMMISSION

Jeffrey D.
Emidy

Digitally signed by Jeffrey D. Emidy
Date: 2021.07.22 16:46:23 -04'00'

Date: 22 July 2021

Jeffrey D. Emidy, Interim Executive Director/Interim SHPO
~~J. Paul Loether, Executive Director/SHPO~~

BLACKSTONE HERITAGE CORRIDOR, INC.

Devon Kurtz, Executive Director

Date:



IN WITNESS THEREOF, FHWA, RIDOT, RIHPHC, BHCI and NITHPO through their duly authorized representatives have executed this Programmatic Agreement as of the date last written below.

SIGNATORIES:

FEDERAL HIGHWAY ADMINISTRATION

Date:

Carlos Machado, Division Administrator

RHODE ISLAND DEPARTMENT OF TRANSPORTATION

Date:

Peter Alviti, Jr., Director

RHODE ISLAND HISTORICAL PRESERVATION AND HERITAGE COMMISSION

Date:

J. Paul Loether, Executive Director/SHPO

BLACKSTONE HERITAGE CORRIDOR, INC.



Date: 07/12/2021

Devon Kurtz, Executive Director

INVITED SIGNATORY:

NARRAGANSETT INDIAN TRIBAL HISTORIC PRESERVATION OFFICE

Date:

John Brown, Tribal Historic Preservation Officer



APPENDIX I

ARCHAEOLOGICAL MONITORING PROTOCOLS DURING CONSTRUCTION

An archaeologist will observe and monitor construction activities within the project area to identify and record all historical archaeological deposits that may be present within the Project impact areas. Color digital photographs will be taken of the general project area, construction work, and any identified archaeological features or artifacts. The following procedures will be adhered to in the event of a potential discovery of archaeological remains during construction.

1. If suspected artifacts or archaeological features are uncovered during a construction activity, that activity shall immediately be halted in proximity to the discovery until it can be determined whether materials are historical and, if so, whether they represent a potentially significant site. The RIDOT's onsite cultural resource consultant, in consultation with any tribal monitors, will make an initial determination in the field.
2. If a possible site is discovered, the contractor will immediately notify the resident engineer of the potential discovery. Notification will include the specific construction area (e.g., location/address, intersection, spoil pile, etc.) where the potential site is located. The resident engineer will direct a Stop Work order to the Contractor's site foreman, flag or fence off the archaeological discovery location, and direct the Contractor to take measures to ensure site security. The Contractor will not restart work in the area of the find until the resident engineer has granted clearance.
3. The RIDOT's cultural resource consultant will contact the RIDOT Cultural Resource Unit (CRU). In consultation with the RIDOT CRU, the RIHPHC, BHCI, and the Narragansett Indian Tribal Historic Preservation Office (NITHPO), the on-site cultural resource consultant will determine if the site is a potentially significant archaeological resource. If the reported find is determined not be a potentially significant archaeological resource, the resident engineer will notify the Contractor's Work Foreman to resume work.
4. If the reported find is determined to be a significant site, the on-site cultural resource consultant, in consultation with the RIDOT CRU, RIHPHC, BHCI and the NITHPO, will survey the site as necessary in accordance with RIHPHC standards and guidelines. Since the area is likely to have already been partially disturbed by construction activities, the objective of any cultural resource investigations will be to evaluate data quickly so that notifications are made, and consultation can proceed. If on-site archaeological investigations are required, the resident engineer will inform the construction contractor. No construction work at the site that could affect the artifacts will be performed until the archaeological fieldwork is complete. The site will be flagged as being off-limits for work but will not be identified as an archaeological site per se in order to protect the resources.

5. If the resource is determined to be a significant archaeological resource and it is threatened by further construction, the on-site cultural resource consultant, at the direction of the RIDOT CRU in consultation with the RIHPHC, and, as appropriate, the NITHPO, will develop a site mitigation plan.
6. The duration of any work stoppages will be contingent upon the significance of the identified archaeological resource(s) and consultation with RIDOT CRU, RIHPHC, and other appropriate parties to determine the appropriate measures to avoid, minimize, or mitigate any adverse effects to the site.
7. Once site is clearance is received by the RIHPHC, the RIDOT's chief inspector will notify the construction contractor that work may proceed.

HUMAN REMAINS DISCOVERIES

The treatment of any human remains encountered during the Project will be handled in accordance with the Rhode Island State Cemeteries Act (RIGL 23-18-11 et seq.) and by the RIHPHC's (2012) Rules and Regulations Pertaining to Registration and Protection of Historic Cemeteries.

At all times human remains must be treated with the utmost dignity and respect. Human remains and/or associated artifacts will be left in place and not disturbed. No skeletal remains or materials associated with the remains will be collected or removed until appropriate consultation has taken place and a plan of action has been developed. The procedures that will be followed if human remains are discovered during Project construction are as follows:

1. If onsite personnel identify human remains or possible human remains, all construction work in the immediate vicinity of the site that could affect the integrity of the remains will cease. The remains will not be touched, moved, or further disturbed. The resident engineer will direct a Stop Work order to the contractor's foreman and take measures to ensure site security.
2. The resident engineer will record the exact location of the find, its time of discovery, and will immediately contact the RIDOT CRU.
3. The RIDOT CRU or its cultural resource consultant will notify the Office of the Chief Medical Examiner (OCME) and local law enforcement. If the OCME determines the remains are more than 100 years old, the OCME will notify the RIHPHC. The RIHPHC will determine if the remains are Native American and if so, will notify the NITHPO if they are not present on-site.
4. If human remains are discovered, the RIDOT, RIHPHC, and the NITHPO will discuss whether there are any feasible alternatives to protect the remains. The results of this consultation will be memorialized in writing. If it is not possible to protect the remains, they may be excavated only under a permit from the RIDOT and in consultation with the City of Providence and City of East Providence and the NITHPO.
5. In all cases, due care and consultation with the NITHPO will be taken in the excavation and subsequent transport and storage of the remains to ensure their security and respectful treatment.



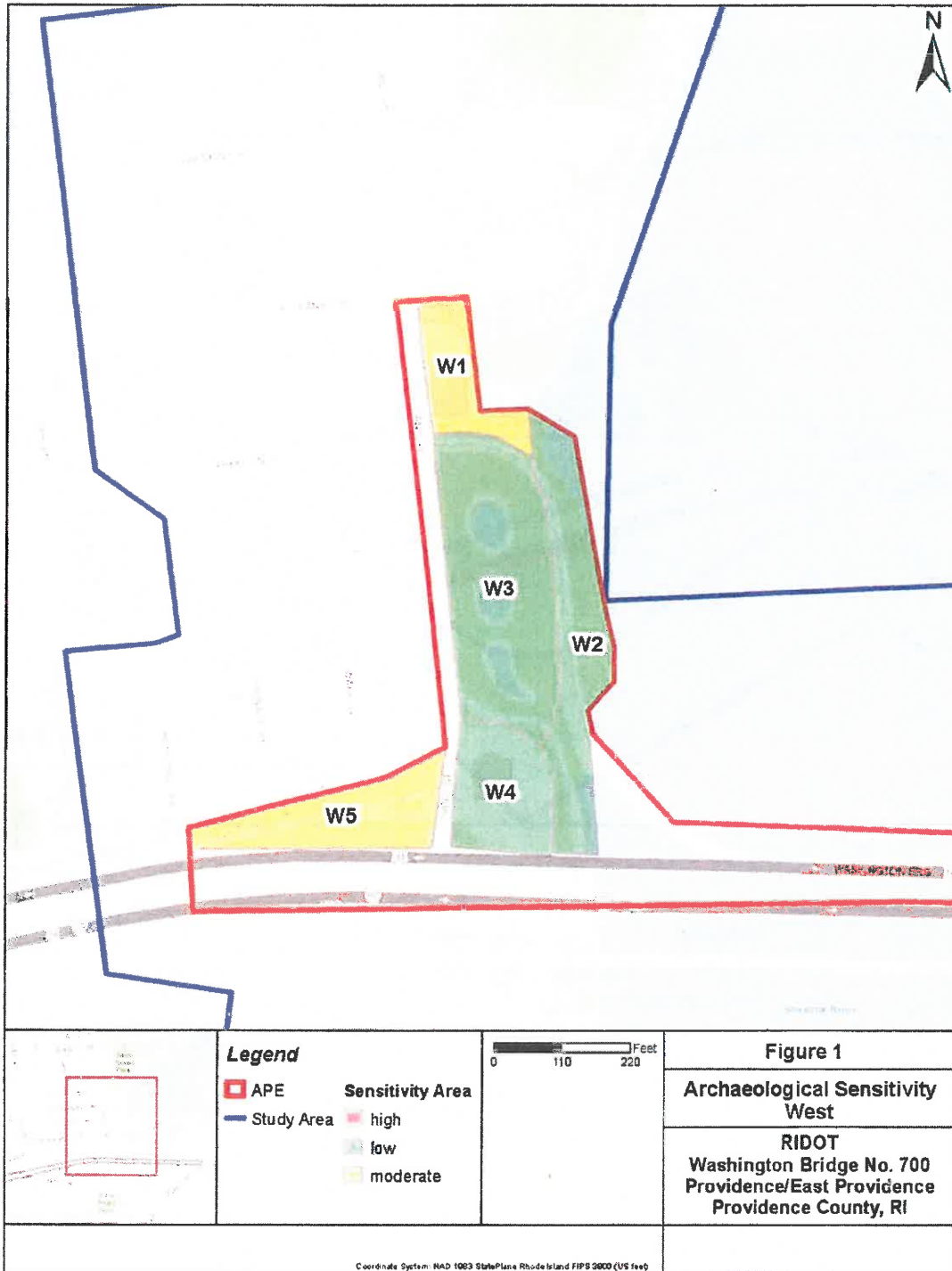
LABORATORY PROCESSING AND ANALYSES

Recovered cultural materials will be brought to RIDOT's temporary laboratory facility for processing and analyses. These activities will include cleaning, identification, and cataloging of recovered cultural materials; as well as preliminary analyses of spatial distributions of artifacts; and map and graphics production. Artifacts will be cataloged by unique artifact grouping in a relational database system (Rediscovery). Recorded fields include an artifact's material, function, manufacturing techniques, and date ranges.

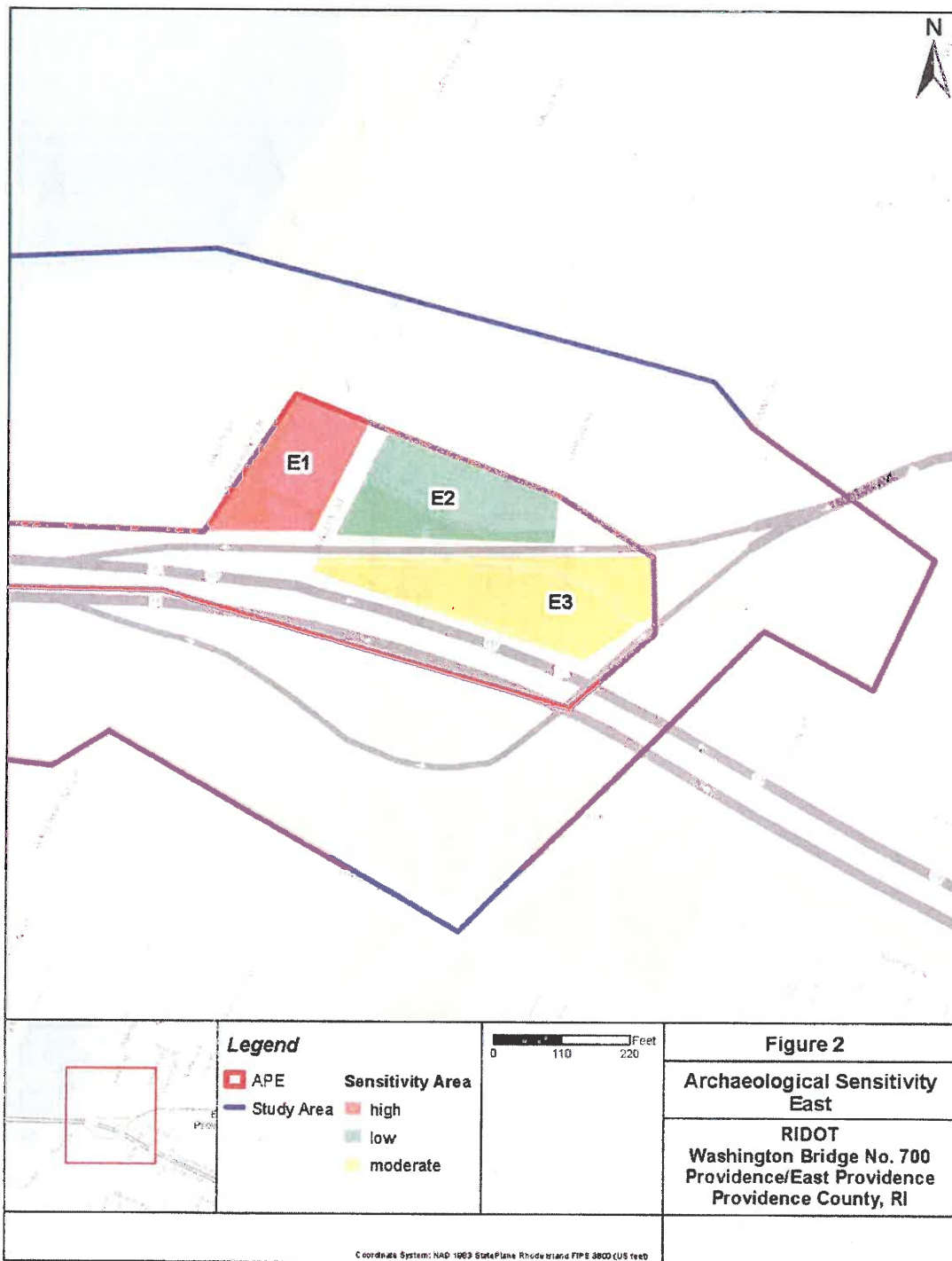
Following laboratory processing and cataloging activities, all cultural materials will be stored in acid-free Hollinger boxes with box content lists and labels printed on acid-free paper. These boxes will be curated in accordance with the Secretary of the Interior's Standards Curation of Federally-Owned and Administered Archeological Collections (36 CFR 79) and the RIHPHC's Performance Standards and Guidelines for Archaeology in Rhode Island (2015) at RIDOT's temporary laboratory facility, currently located at 26 Main Street, Pawtucket, Rhode Island. The Narragansett Indian Tribe will have open access, by appointment, to recovered cultural materials associated with this project at the temporary laboratory facility.

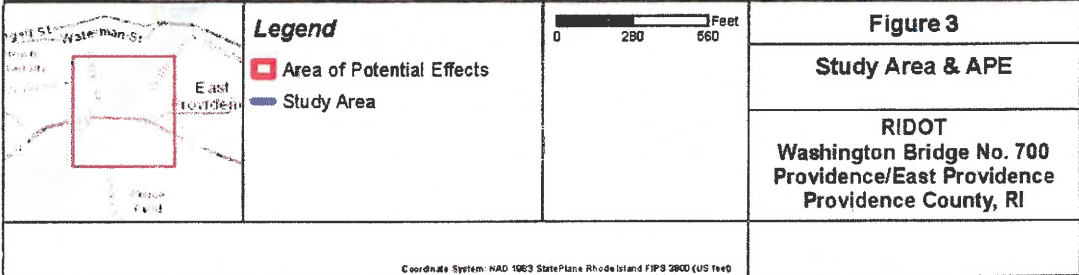
APPENDIX II

Areas of Archaeological Sensitivity and Area of Potential Effect



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MANAGEMENT COUNCIL





RECEIVED
 APR 11 2022
 COASTAL RESOURCES
 MANAGEMENT COUNCIL

From: [Begin, Jacob \(DOT\)](#)
To: [Scott Hobson](#)
Cc: [Pompei, Anthony \(DOT\)](#); [Maccarone, Louis \(DOT\)](#); [Richardson, Alisa \(DOT\)](#); [Johnstone, Erik \(DOT\)](#); [Bryan Blackerby](#); [Jeffrey Klein](#); [Rick Rhodes](#); [Chelsea Glinka](#); [Andrew Prezioso](#); [Palumbo, Vincent \(DOT\)](#)
Subject: RE: [EXTERNAL] : Washington Bridge - Hunter S. Marston Boathouse - CE Determination
Date: Friday, October 22, 2021 11:22:10 AM
Attachments: [image001.gif](#)

Hi Scott,

Based on the information provided, the RIDOT Cultural Resources Unit concurs that no changes are required to the Section 4(f) or Historic Properties portions of the CE assuming that the bike path associated with India Point park is incorporated into the ATC (as depicted in the first page of provided attachments) and any work abutting the Boathouse includes appropriate communication and outreach to the property owner.

Any future changes to the scope or limits to the project should be communicated to this office.

Thank you for the opportunity to comment.

-Jacob

Jacob Begin
Supervising Historic Preservation Specialist
Cultural Resources Unit

From: Scott Hobson <shobson@vhb.com>
Sent: Monday, October 11, 2021 4:38 PM
To: Begin, Jacob (DOT) <jacob.begin@dot.ri.gov>
Cc: Pompei, Anthony (DOT) <anthony.pompei@dot.ri.gov>; Maccarone, Louis (DOT) <Louis.Maccarone@dot.ri.gov>; Richardson, Alisa (DOT) <Alisa.Richardson@dot.ri.gov>; Johnstone, Erik (DOT) <erik.johnstone@dot.ri.gov>; Bryan Blackerby <bblackerby@barlettaco.com>; Klein, Jeffrey <JKlein@VHB.com>; Rhodes, Rick <rrrhodes@vhb.com>; Chelsea Glinka <CGlinka@VHB.com>; Prezioso, Andrew <APrezioso@VHB.com>
Subject: [EXTERNAL] : Washington Bridge - Hunter S. Marston Boathouse - CE Determination

Hi Jacob,

Thank you very much for participating in the Washington Bridge permitting meeting last Thursday. As we had presented, VHB has developed Alternative Technical Concepts (ATCs) as a means to further enhance the Department's base highway design, largely to achieve improved traffic flow, constructability, and ease of future RIDOT maintenance. One of the ATCs accepted by the Department is a relocation of Gano Street at its southerly end, where it transitions into India Street. The Department's Base Technical Concept (BTC), and that which the CE is based upon, proposed no work southerly of the Washington Bridge footprint on the westerly bank of the Seekonk River. In

contrast, the India Street/Gano Street relocation ATC now proposes road relocation work southerly of the Washington Bridge and westerly of the Hunter S. Marston Boathouse. We respectfully request your review of the ATC design with respect to any Section 106 and/or 4(f) implications concerning the Hunter S. Marston Boathouse.

To assist with your review, please find attached graphics that show the base and alternative concept designs overlaid for the overall project, the India Street/Gano Street relocation ATC showing the assumed boathouse property lines and boathouse proper, the City's tax plat mapping, and aerial imagery from previous photo years. The property line shown in the ATC graphic was taken from the City's GIS database, but VHB possesses mapping from a previous RIDOT bridge phase that depicts the western property line as being located nearly against the westerly edge of the boathouse building. Consequently, the City's GIS representation that we have shown for the purposes of your review is believed to be the most westerly possible location for the boathouse property line. No work is proposed on the boathouse parcel as currently reflected on the graphic, and VHB will ensure that no work is proposed on the parcel as the ATC design advances. Although we feel sufficient physical space exists between the boathouse property line and anticipated limits of work, tightened side slopes or the use of low retaining walls could be employed if necessary to preclude any potential for encroachment and to avoid the potential for re-opening the Section 106 process.

With respect to the boathouse and archaeological significance, it may be relevant to note that India Street was previously located in the general footprint of the currently proposed India Street/Gano Street relocation ATC, as reflected in the attached 2002 aerial imagery. The 2009 and 2010 aerial images are provided simply to show the timing of the reconfiguration of India Street – with pavement remnants of the former road location visible. The 2020 imagery simply reflects the removal of the former road pavement and the addition of the bike path.

As you noted during the meeting, the presence of the boathouse was addressed in the CE document – under separate discussions of Section 4(f) properties and historic properties. In particular, we call your attention to the second paragraph of the "Section 4(f) Properties" subsection on CE page 20 of 42 and to the last paragraph of the same subsection on CE page 21 of 42, in which conclusions are drawn. It appears that wording pertaining to the boathouse under the "Historic Properties" subsection in the third paragraph on CE page 22 of 42 may still be accurate as phrased. Please advise if you concur that no changes are required to the CE for the proposed India Street/Gano Street relocation ATC.

Thank you for your review. Please feel free to contact me if you should have any questions or should require additional information.

Sincerely,
Scott

Scott Hobson
Senior Ecologist



1 Cedar Street
Suite 400
Providence, RI 02903-1023
P 401.457.7824 | F 401.277.8400
shobson@vhb.com

Engineers | Scientists | Planners | Designers
www.vhb.com [vhb.com]

[VHB Viewpoints](http://vhb.com/viewpoints) [viewpoints.vhb.com]

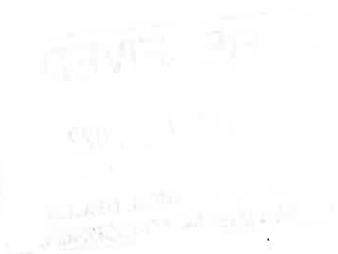
Explore trends and critical issues with our thought leaders.

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Vanasse Hangen Brustlin, Inc. | info@vhb.com

**Appendix I – U.S. Fish and Wildlife
Service Endangered Species Act (ESA)
Section 7 – Official Species List and
Consistency Letter**



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United States Department of the Interior



FISH AND WILDLIFE SERVICE
New England Ecological Services Field Office
70 Commercial Street, Suite 300
Concord, NH 03301-5094
Phone: (603) 223-2541 Fax: (603) 223-0104
<http://www.fws.gov/newengland>

In Reply Refer To:

December 01, 2021

Consultation Code: 05E1NE00-2022-SLI-0622

Event Code: 05E1NE00-2022-E-02110

Project Name: Bridge Group 57T-10: I-195 Washington North Phase 2

Subject: List of threatened and endangered species that may occur in your proposed project location or may be affected by your proposed project

To Whom It May Concern:

The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*).

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the ECOS-IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the ECOS-IPaC system by completing the same process used to receive the enclosed list.

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 *et seq.*), Federal agencies are required to utilize their authorities to carry out programs for the conservation of threatened and endangered species and to determine whether projects may affect threatened and endangered species and/or designated critical habitat.



A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2) (c)). For projects other than major construction activities, the Service suggests that a biological evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

If a Federal agency determines, based on the Biological Assessment or biological evaluation, that listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to consult with the Service pursuant to 50 CFR 402. In addition, the Service recommends that candidate species, proposed species and proposed critical habitat be addressed within the consultation. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found in the "Endangered Species Consultation Handbook" at:

<http://www.fws.gov/endangered/esa-library/pdf/TOC-GLOS.PDF>

Please be aware that bald and golden eagles are protected under the Bald and Golden Eagle Protection Act (16 U.S.C. 668 *et seq.*), and projects affecting these species may require development of an eagle conservation plan (http://www.fws.gov/windenergy/eagle_guidance.html). Additionally, wind energy projects should follow the wind energy guidelines (<http://www.fws.gov/windenergy/>) for minimizing impacts to migratory birds and bats.

Guidance for minimizing impacts to migratory birds for projects including communications towers (e.g., cellular, digital television, radio, and emergency broadcast) can be found at:

<http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/towers.htm>;

<http://www.towerkill.com>; and

www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/comtow.html.

<http://>

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the Act. Please include the Consultation Tracking Number in the header of this letter with any request for consultation or correspondence about your project that you submit to our office.

Attachment(s):

- Official Species List

Official Species List

This list is provided pursuant to Section 7 of the Endangered Species Act, and fulfills the requirement for Federal agencies to "request of the Secretary of the Interior information whether any species which is listed or proposed to be listed may be present in the area of a proposed action".

This species list is provided by:

New England Ecological Services Field Office

70 Commercial Street, Suite 300

Concord, NH 03301-5094

(603) 223-2541



Project Summary

Consultation Code: 05E1NE00-2022-SLI-0622

Event Code: Some(05E1NE00-2022-E-02110)

Project Name: Bridge Group 57T-10: I-195 Washington North Phase 2

Project Type: TRANSPORTATION

Project Description: The Proposed Action (Project), also known as the Phase 2 Washington Bridge Rehabilitation and Redevelopment Project, includes the rehabilitation of the Washington Bridge North (RIDOT Bridge No. 700) structure which carries Interstate 195 (I-195) westbound and local roadways over the Seekonk River, and the construction of associated new on and off ramps in Providence and East Providence (Attachment A). Phase 1 of the project was the recently completed partial rehabilitation of the substructure of the bridge.

The major elements of Phase 2 of the Project are:

- Rehabilitation of the Washington Bridge North structure including partial widening of spans 1 through 4 to provide five continuous lanes of I-195 westbound traffic over the bridge. This partial widening will require the construction of new substructure elements.
- Construction of a new off-ramp from I-195 Westbound to Waterfront Drive in East Providence.
- Construction of a new bridge structure to carry traffic from the Taunton Avenue and Veterans Memorial Parkway on-ramps over the new off-ramp to Waterfront Drive. This will be RIDOT bridge number 126701 – Waterfront Drive off-ramp bridge.
- Construction of a temporary on-ramp to re-route traffic from the Taunton Avenue and Veterans Memorial Parkway on-ramps to eliminate detours and maintain traffic flow during the construction of bridge number 126701.
- Construction of a new bridge structure to carry traffic from Gano Street in Providence onto I-195 Westbound. This will be RIDOT bridge number 126601 – Gano St. on-ramp bridge.
- Construction of new retaining walls to support the embankments around the two new bridge structures (126601 & 126701) and the new off-ramp to Waterfront Drive.
- Relocation of Gano Street, the eastern end of India Street, and the existing segment of the East Bay Bike Path that is perpendicular to the Washington Bridge and parallel to Gano Street and India Street.
- Construction of stormwater Best Management Practices (BMPs).
- Restriping of I-195 westbound from the Broadway overpass to the new Waterfront Drive off-ramp to allow four (4) lanes of through traffic on the mainline, eliminating the current lane drop at Broadway.
- Adding a through lane on the western end of the Washington Bridge to

reduce the weaving movements between Taunton Avenue/Veterans Memorial Parkway on-ramps and Gano Street off-ramps. The proposed construction of the Waterfront Drive off-ramp and reconfiguration of the Gano Street on-ramp are access modifications that require a FHWA determination of acceptability for engineering, safety and operations. An Interchange Justification Report (IJR) was prepared to document that the proposed access modifications are consistent with FHWA policy on interstate system access change requests. The IJR was updated based on the Alternative Technical Concept (ATC) design and was approved by RIDOT on November 2, 2021. Final FHWA approval of the access change is dependent on satisfactorily completing the National Environmental Policy Act (NEPA) review process.

Project Location:

Approximate location of the project can be viewed in Google Maps: <https://www.google.com/maps/@41.8179949,-71.39736951827041,14z>



Counties: Providence County, Rhode Island



Endangered Species Act Species

There is a total of 3 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries¹, as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

-
1. [NOAA Fisheries](#), also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

Mammals

NAME	STATUS
Northern Long-eared Bat <i>Myotis septentrionalis</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/9045	Threatened

Birds

NAME	STATUS
Roseate Tern <i>Sterna dougallii dougallii</i> Population: Northeast U.S. nesting population No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/2083	Endangered

Insects

NAME	STATUS
Monarch Butterfly <i>Danaus plexippus</i> No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/9743	Candidate

Critical habitats

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.



United States Department of the Interior



FISH AND WILDLIFE SERVICE
New England Ecological Services Field Office
70 Commercial Street, Suite 300
Concord, NH 03301-5094
Phone: (603) 223-2541 Fax: (603) 223-0104
<http://www.fws.gov/newengland>

IPaC Record Locator: 802-108398557

December 21, 2021

Subject: Consistency letter for the 'Bridge Group 57T-10: I-195 Washington North Phase 2' project (no current TAILS record) under the revised February 5, 2018, FHWA, FRA, FTA Programmatic Biological Opinion for Transportation Projects within the Range of the Indiana Bat and Northern Long-eared Bat.

To whom it may concern:

The U.S. Fish and Wildlife Service (Service) has received your request to verify that the **Bridge Group 57T-10: I-195 Washington North Phase 2** (Proposed Action) may rely on the revised February 5, 2018, FHWA, FRA, FTA Programmatic Biological Opinion for Transportation Projects within the Range of the Indiana Bat and Northern Long-eared Bat (PBO) to satisfy requirements under Section 7(a)(2) of the Endangered Species Act of 1973 (ESA) (87 Stat.884, as amended; 16 U.S.C. 1531 *et seq.*).

Based on the information you provided (Project Description shown below), you have determined that the Proposed Action will have no effect on the endangered Indiana bat (*Myotis sodalis*) or the threatened Northern long-eared bat (*Myotis septentrionalis*). If the Proposed Action is not modified, **no consultation is required for these two species.**

For Proposed Actions that include bridge/structure removal, replacement, and/or maintenance activities: If your initial bridge/structure assessments failed to detect Indiana bats, but you later detect bats during construction, please submit the Post Assessment Discovery of Bats at Bridge/Structure Form (User Guide Appendix E) to this Service Office. In these instances, potential incidental take of Indiana bats may be exempted provided that the take is reported to the Service.

If the Proposed Action may affect any other federally-listed or proposed species and/or designated critical habitat, additional consultation between the lead Federal action agency and this Service Office is required. If the proposed action has the potential to take bald or golden eagles, additional coordination with the Service under the Bald and Golden Eagle Protection Act may also be required. In either of these circumstances, please advise the lead Federal action agency accordingly.



The following species may occur in your project area and **are not** covered by this determination:

- Monarch Butterfly *Danaus plexippus* Candidate
- Roseate Tern *Sterna dougallii dougallii* Endangered

Project Description

The following project name and description was collected in IPaC as part of the endangered species review process.

Name

Bridge Group 57T-10: I-195 Washington North Phase 2

Description



The Proposed Action (Project), also known as the Phase 2 Washington Bridge Rehabilitation and Redevelopment Project, includes the rehabilitation of the Washington Bridge North (RIDOT Bridge No. 700) structure which carries Interstate 195 (I-195) westbound and local roadways over the Seekonk River, and the construction of associated new on and off ramps in Providence and East Providence (Attachment A). Phase 1 of the project was the recently completed partial rehabilitation of the substructure of the bridge.

The major elements of Phase 2 of the Project are:

- Rehabilitation of the Washington Bridge North structure including partial widening of spans 1 through 4 to provide five continuous lanes of I-195 westbound traffic over the bridge. This partial widening will require the construction of new substructure elements.
- Construction of a new off-ramp from I-195 Westbound to Waterfront Drive in East Providence.
- Construction of a new bridge structure to carry traffic from the Taunton Avenue and Veterans Memorial Parkway on-ramps over the new off-ramp to Waterfront Drive. This will be RIDOT bridge number 126701 – Waterfront Drive off-ramp bridge.
- Construction of a temporary on-ramp to re-route traffic from the Taunton Avenue and Veterans Memorial Parkway on-ramps to eliminate detours and maintain traffic flow during the construction of bridge number 126701.
- Construction of a new bridge structure to carry traffic from Gano Street in Providence onto I-195 Westbound. This will be RIDOT bridge number 126601 – Gano St. on-ramp bridge.
- Construction of new retaining walls to support the embankments around the two new bridge structures (126601 & 126701) and the new off-ramp to Waterfront Drive.
- Relocation of Gano Street, the eastern end of India Street, and the existing segment of the East Bay Bike Path that is perpendicular to the Washington Bridge and parallel to Gano Street and India Street.
- Construction of stormwater Best Management Practices (BMPs).
- Restriping of I-195 westbound from the Broadway overpass to the new Waterfront Drive off-ramp to allow four (4) lanes of through traffic on the mainline, eliminating the current lane drop at Broadway.
- Adding a through lane on the western end of the Washington Bridge to reduce the weaving movements between Taunton Avenue/Veterans Memorial Parkway on-ramps and Gano Street off-ramps.

The proposed construction of the Waterfront Drive off-ramp and reconfiguration of the Gano Street on-ramp are access modifications that require a FHWA determination of acceptability for engineering, safety and operations. An Interchange Justification Report (IJR) was prepared to document that the proposed access modifications are consistent with FHWA policy on interstate system access change requests. The IJR was updated based on the Alternative Technical Concept (ATC) design and was approved by RIDOT on November 2, 2021. Final FHWA approval of the access change is dependent on satisfactorily completing the National Environmental Policy Act (NEPA) review process.

Determination Key Result

Based on the information you provided, you have determined that the Proposed Action will have no effect on the endangered Indiana bat and/or the threatened Northern long-eared bat. Therefore, no consultation with the U.S. Fish and Wildlife Service pursuant to Section 7(a)(2) of the Endangered Species Act of 1973 (ESA) (87 Stat. 884, as amended 16 U.S.C. 1531 *et seq.*) is required for these two species.

Qualification Interview

1. Is the project within the range of the Indiana bat^[1]?

[1] See [Indiana bat species profile](#)

Automatically answered

No

2. Is the project within the range of the Northern long-eared bat^[1]?

[1] See [Northern long-eared bat species profile](#)

Automatically answered

Yes

3. Which Federal Agency is the lead for the action?

A) *Federal Highway Administration (FHWA)*

4. Are *all* project activities limited to non-construction^[1] activities only? (examples of non-construction activities include: bridge/abandoned structure assessments, surveys, planning and technical studies, property inspections, and property sales)

[1] Construction refers to activities involving ground disturbance, percussive noise, and/or lighting.

No

5. Does the project include *any* activities that are **greater than** 300 feet from existing road/rail surfaces^[1]?

[1] Road surface is defined as the actively used [e.g. motorized vehicles] driving surface and shoulders [may be pavement, gravel, etc.] and rail surface is defined as the edge of the actively used rail ballast.

No

6. Does the project include *any* activities **within** 0.5 miles of a known Indiana bat and/or NLEB hibernaculum^[1]?

[1] For the purpose of this consultation, a hibernaculum is a site, most often a cave or mine, where bats hibernate during the winter (see suitable habitat), but could also include bridges and structures if bats are found to be hibernating there during the winter.

No

7. Is the project located **within** a karst area?

No



8. Is there *any* suitable^[1] summer habitat for Indiana Bat or NLEB **within** the project action area^[2]? (includes any trees suitable for maternity, roosting, foraging, or travelling habitat)

[1] See the Service's [summer survey guidance](#) for our current definitions of suitable habitat.

[2] The action area is defined as all areas to be affected directly or indirectly by the Federal action and not merely the immediate area involved in the action (50 CFR Section 402.02). Further clarification is provided by the [national consultation FAQs](#).

No

9. Does the project include wetland or stream protection activities associated with compensatory wetland mitigation?

Yes

10. Does the project include slash pile burning?

No

11. Does the project include *any* bridge removal, replacement, and/or maintenance activities (e.g., any bridge repair, retrofit, maintenance, and/or rehabilitation work)?

Yes

12. Is there *any* suitable habitat^[1] for Indiana bat or NLEB **within** 1,000 feet of the bridge? (includes any trees suitable for maternity, roosting, foraging, or travelling habitat)

[1] See the Service's current [summer survey guidance](#) for our current definitions of suitable habitat.

No

13. Does the project include the removal, replacement, and/or maintenance of *any* structure other than a bridge? (e.g., rest areas, offices, sheds, outbuildings, barns, parking garages, etc.)

No

14. Will the project involve the use of **temporary** lighting *during* the active season?

Yes

15. Is there *any* suitable habitat **within** 1,000 feet of the location(s) where **temporary** lighting will be used?

No

16. Will the project install new or replace existing **permanent** lighting?

Yes

17. Is there *any* suitable habitat **within** 1,000 feet of the location(s) where **permanent** lighting will be installed or replaced?

No

18. Does the project include percussives or other activities (**not including tree removal/trimming or bridge/structure work**) that will increase noise levels above existing traffic/background levels?

Yes

19. Will the activities that use percussives (**not including tree removal/trimming or bridge/structure work**) and/or increase noise levels above existing traffic/background levels be conducted *during* the active season^[1]?

[1] Coordinate with the local Service Field Office for appropriate dates.

Yes

20. Will *any* activities that use percussives (**not including tree removal/trimming or bridge/structure work**) and/or increase noise levels above existing traffic/background levels be conducted *during* the inactive season^[1]?

[1] Coordinate with the local Service Field Office for appropriate dates.

Yes

21. Are *all* project activities that are **not associated with** habitat removal, tree removal/trimming, bridge and/or structure activities, temporary or permanent lighting, or use of percussives, limited to actions that DO NOT cause any additional stressors to the bat species?

Examples: lining roadways, unlighted signage, rail road crossing signals, signal lighting, and minor road repair such as asphalt fill of potholes, etc.

Yes

22. Will the project raise the road profile **above the tree canopy**?

No

23. Is the location of this project consistent with a No Effect determination in this key?

Automatically answered

Yes, because the project action area is not within suitable Indiana bat and/or NLEB summer habitat and is outside of 0.5 miles of a hibernaculum.

24. Is the bridge removal, replacement, or maintenance activities portion of this project consistent with a No Effect determination in this key?

Automatically answered

Yes, because the bridge is more than 1,000 feet from the nearest suitable habitat and is therefore considered unsuitable for use by bats

25. Is the temporary lighting portion of this project consistent with a No Effect determination in this key?

Automatically answered

Yes, because the lighting will be more than 1,000 feet from the nearest suitable habitat

26. Is the permanent lighting portion of this project consistent with a No Effect determination in this key?

Automatically answered

Yes, because the lighting will be more than 1,000 feet from the nearest suitable habitat



Determination Key Description: FHWA, FRA, FTA Programmatic Consultation For Transportation Projects Affecting NLEB Or Indiana Bat

This key was last updated in IPaC on April 22, 2021. Keys are subject to periodic revision.

This decision key is intended for projects/activities funded or authorized by the Federal Highway Administration (FHWA), Federal Railroad Administration (FRA), and/or Federal Transit Administration (FTA), which may require consultation with the U.S. Fish and Wildlife Service (Service) under Section 7 of the Endangered Species Act (ESA) for the endangered **Indiana bat** (*Myotis sodalis*) and the threatened **Northern long-eared bat** (NLEB) (*Myotis septentrionalis*).

This decision key should only be used to verify project applicability with the Service's [February 5, 2018, FHWA, FRA, FTA Programmatic Biological Opinion for Transportation Projects](#). The programmatic biological opinion covers limited transportation activities that may affect either bat species, and addresses situations that are both likely and not likely to adversely affect either bat species. This decision key will assist in identifying the effect of a specific project/activity and applicability of the programmatic consultation. The programmatic biological opinion is not intended to cover all types of transportation actions. Activities outside the scope of the programmatic biological opinion, or that may affect ESA-listed species other than the Indiana bat or NLEB, or any designated critical habitat, may require additional ESA Section 7 consultation.

**Appendix J – NOAA Fisheries GARFO
PRD – ESA Section 7 Updated
Consultation**



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Leporacci, Nicole (DOT)

From: Roosevelt Mesa - NOAA Affiliate <roosevelt.mesa@noaa.gov>
Sent: Tuesday, November 30, 2021 2:48 PM
To: Leporacci, Nicole (DOT)
Cc: Johnstone, Erik (DOT); Richardson, Alisa (DOT)
Subject: Re: Fw: [EXTERNAL] : Re: FHWA GARFO NLAA Program: RIDOT - Bridge Group 57T-10: I-195 Washington North Phase 2 Bridge 070001 PTSID 2604M

Hi Nicole,

Thanks for reaching out, and I hope you had a great Thanksgiving weekend as well.

There are a few scenarios under which reinitiation of Section 7 consultation might be necessary: 1) If the amount or extent of taking specified in the incidental take statement is exceeded (formal consultations); 2) If new information reveals effects of the action that may affect listed species or critical habitat in a manner or to an extent not previously considered; 3) If the identified action is subsequently modified in a manner that causes an effect to the listed species or critical habitat that was not considered in the biological assessment or written concurrence; or 4) If a new species is listed or critical habitat designated that may be affected by the identified action.

In this case, you'd be looking at 3). Based on the new design that eliminates in-water work and the use of a spud barge (thanks for sharing the info as I am definitely not a barge expert!), the proposed action is not being modified in a way that would introduce any potential stressors and/or associated effects not considered in the initial consultation. With that in mind, I would say that a reinitiation of Section 7 consultation would not be required.

I hope this is helpful. Please let me know if you have any additional questions.

Best regards,
Roosevelt

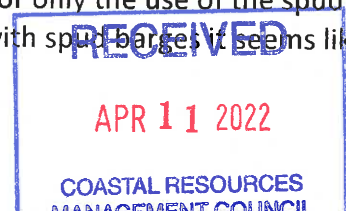
On Tue, Nov 30, 2021 at 10:37 AM Leporacci, Nicole (DOT) <Nicole.Leporacci@dot.ri.gov> wrote:
Hi Roosevelt,

I hope you had a nice Thanksgiving weekend. I have yet another question for you! Back in the Spring, we submitted a project to you that required the installation of a pier column in the Seekonk River for the rehabilitation of the Washington bridge (see attached).

This project has since been re-designed, and will now not require any in-water work. However, to perform work on the bridge they will still be using a spud barge which will be anchored by steel piles – either pointed or pipe (known as spuds). The barge spuds are lowered and raised using a hydraulic power pack into the river bottom. It simply lowers them down into the river bed at a minimal embedment. There are no turbidity issues, etc. See the following for how the system works: <https://www.poseidonbarge.com/wp-content/uploads/2020/11/PoseidonBargeWinchSetUpLit.pdf>

This barge will be moved to different locations in the waterbody throughout the project.

Our question is, would we be required to submit another verification form for only the use of the spud barge? Due to minimal amounts of turbidity, noise, and impact associated with spud barges it seems like we would only need to follow the vessel traffic PDC's. Thank you!



Best,
Nicole

Nicole Lineberry (Leporacci)
Senior Environmental Scientist
Natural Resources Unit, RIDOT
E: nicole.leporacci@dot.ri.gov

Nicole Lineberry (Leporacci)
Senior Environmental Scientist
Natural Resources Unit, RIDOT
E: nicole.leporacci@dot.ri.gov

From: Roosevelt Mesa - NOAA Affiliate <roosevelt.mesa@noaa.gov>
Sent: Tuesday, April 13, 2021 1:05 PM
To: Leporacci, Nicole (DOT) <Nicole.Leporacci@dot.ri.gov>
Subject: Re: [EXTERNAL] : Re: FHWA GARFO NLAA Program: RIDOT - Bridge Group 57T-10: I-195 Washington North Phase 2 Bridge 070001 PTSID 2604M

Hi Nicole,
Thank you for the updated FHWA NLAA verification form. My signed concurrence is attached.

Best,
Roosevelt

On Tue, Apr 13, 2021 at 11:35 AM Leporacci, Nicole (DOT) <Nicole.Leporacci@dot.ri.gov> wrote:

Hi Roosevelt,

Please find attached the edited form. Thank you!

Best,

Nicole

From: Roosevelt Mesa - NOAA Affiliate <roosevelt.mesa@noaa.gov>
Sent: Thursday, April 8, 2021 10:36 AM
To: Leporacci, Nicole (DOT) <Nicole.Leporacci@dot.ri.gov>
Subject: [EXTERNAL] : Re: FHWA GARFO NLAA Program: RIDOT - Bridge Group 57T-10: I-195 Washington North Phase 2 Bridge 070001 PTSID 2604M

Good morning Nicole,

I hope all is well.

Attached to this email, please find the FHWA verification form for the I-195 bridge in Providence with a couple of minor comments.

Let me know if you have any questions.

Best,

Roosevelt

On Thu, Apr 8, 2021 at 10:02 AM NMFS.GAR.ESA.Section7 - NOAA Service Account <nmfs.gar.esa.section7@noaa.gov> wrote:

----- Forwarded message -----

From: **Leporacci, Nicole (DOT)** <Nicole.Leporacci@dot.ri.gov>

Date: Thu, Apr 1, 2021 at 3:30 PM

Subject: FHWA GARFO NLAA Program: RIDOT - Bridge Group 57T-10: I-195 Washington North Phase 2 Bridge 070001 PTSID 2604M

To: NMFS.GAR.ESA.Section7@noaa.gov <NMFS.GAR.ESA.Section7@noaa.gov>

Cc: Richardson, Alisa (DOT) <Alisa.Richardson@dot.ri.gov>, Johnstone, Erik (DOT) <erik.johnstone@dot.ri.gov>, Maccarone, Louis (DOT) <Louis.Maccarone@dot.ri.gov>, Pompei, Anthony (DOT) <anthony.pompei@dot.ri.gov>, Padilla, Carlos (FHWA) <carlos.padilla@dot.gov>, Palumbo, Vincent (DOT) <vincent.palumbo@dot.ri.gov>, Richard, Corey <corey.richard@aecom.com>

Good afternoon,

Please find attached the RI Department of Transportation's (RIDOTs) cover letter and project narrative, verification form, and documentation regarding the ESA Section 7 FHWA GARFO NLAA Program consultation for the rehabilitation of the Washington Bridge North (RIDOT Bridge No. 070001) structure which carries Interstate 195 (I-195) westbound and local roadways over the Seekonk River, and the construction of associated new on and off ramps in Providence and East Providence.

Please let us know if you have any questions or need more information. We look forward to your response. Thank you!

Best,
Nicole



Nicole Lineberry (Leporacci)
Senior Environmental Scientist
Natural Resources Unit, RIDOT
E: nicole.leporacci@dot.ri.gov

--

Roosevelt Mesa (*he/him/his*)

Environmental Specialist

Integrated Statistics, Inc. | In support of NOAA Fisheries

Greater Atlantic Regional Fisheries Office
Protected Resources Division

roosevelt.mesa@noaa.gov | Mobile: 919-491-3028

--

Roosevelt Mesa (*he/him/his*)

Environmental Specialist

Integrated Statistics, Inc. | In support of NOAA Fisheries

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Protected Resources Division

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--

Roosevelt Mesa (*he/him/his*)

Environmental Specialist

Integrated Statistics, Inc. | In support of NOAA Fisheries

Greater Atlantic Regional Fisheries Office
Protected Resources Division

Email: roosevelt.mesa@noaa.gov

Appendix K – NOAA Fisheries GARFO HCD – EFH Updated Consultation



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Re: Fw: [EXTERNAL] : Re: FHWA GARFO EFH Programmatic: RIDOT - Bridge Group 57T-10: I-195 Washington North Phase 2 Bridge 070001 PTSID 2604M

Sabrina Pereira - NOAA Federal <sabrina.pereira@noaa.gov>

Tue 12/21/2021 2:18 PM

To: Leporacci, Nicole (DOT) <Nicole.leporacci@dot.ri.gov>

Hi Nicole,

Since the applicant now plans to use a spud barge as part of this project, a time of year restriction will not be necessary. I hope this helps, but please let me know if you need anything additional.

Best wishes for a relaxing holiday!

Sabrina Pereira

Marine Resources Management Specialist

Habitat and Ecosystem Services Division

NOAA/ National Marine Fisheries Service

Gloucester, MA

Pronouns: she/her/hers

(978)-675-2178

Sabrina.pereira@noaa.gov

On Tue, Dec 21, 2021 at 8:37 AM Leporacci, Nicole (DOT) <Nicole.Leporacci@dot.ri.gov> wrote:
Hi Sabrina,

Following up on this email, I have been asked to obtain in writing (email is fine) if TOY restrictions (Feb 1st-June 30th) would still apply to the project with the use of a spud barge. Thank you!

Best,
Nicole

Nicole Lineberry (Leporacci)

Senior Environmental Scientist

Natural Resources Unit, RIDOT

E: nicole.leporacci@dot.ri.gov

From: Sabrina Pereira - NOAA Federal <sabrina.pereira@noaa.gov>

Sent: Tuesday, November 30, 2021 4:41 PM

To: Leporacci, Nicole (DOT) <Nicole.Leporacci@dot.ri.gov>

Cc: Richardson, Alisa (DOT) <Alisa.Richardson@dot.ri.gov>; Johnstone, Erik (DOT) <erik.johnstone@dot.ri.gov>

Subject: Re: Fw: [EXTERNAL] : Re: FHWA GARFO EFH Programmatic: RIDOT - Bridge Group 57T-10: I-195 Washington North Phase 2 Bridge 070001 PTSID 2604M

Hi Nicole,

Thanks for reaching out, and I hope you had a nice holiday as well! You do not need to resubmit the verification form as the use of spud barges in this area is not a substantial change to the project, or concerning for local resources.

Please let me know if you have any additional questions, and thanks again.

RECEIVED

APR 11 2022

COASTAL RESOURCES
COUNCIL

Sabrina Pereira

Marine Resources Management Specialist
Habitat and Ecosystem Services Division
NOAA/ National Marine Fisheries Service
Gloucester, MA
Pronouns: she/her/hers
(978)-675-2178
Sabrina.pereira@noaa.gov

On Tue, Nov 30, 2021 at 10:25 AM Leporacci, Nicole (DOT) <Nicole.Leporacci@dot.ri.gov> wrote:
Hi Sabrina,

I hope you had a nice Thanksgiving weekend. I have yet another question for you! Back in the Spring, we submitted a project to NMFS that required the installation of a pier column in the Seekonk River for the rehabilitation of the Washington bridge (see attached).

This project has since been re-designed, and will now not require any in-water work. However, to perform work on the bridge they will still be using a spud barge which will be anchored by steel piles – either pointed or pipe (known as spuds). The barge spuds are lowered and raised using a hydraulic power pack into the river bottom. It simply lowers them down into the river bed at a minimal embedment. There are no turbidity issues, etc. See the following for how the system works: <https://www.poseidonbarge.com/wp-content/uploads/2020/11/PoseidonBargeWinchSetUpLit.pdf>

This barge will be moved to different locations in the waterbody throughout the project.

Our question is, would we be required to submit another verification form for only the use of the spud barge. It seems we have not been given TOY restrictions for the use of spud barges in the past due to minimal amounts of turbidity, noise, and impact associated with spud barges.

Thanks,
Nicole

Nicole Lineberry (Leporacci)
Senior Environmental Scientist
Natural Resources Unit, RIDOT
E: nicole.leporacci@dot.ri.gov

From: Lauren Sager - NOAA Affiliate <lauren.m.sager@noaa.gov>
Sent: Tuesday, May 4, 2021 9:23 AM
To: Leporacci, Nicole (DOT) <Nicole.Leporacci@dot.ri.gov>
Subject: [EXTERNAL] : Re: FHWA GARFO EFH Programmatic: RIDOT - Bridge Group 57T-10: I-195 Washington North Phase 2 Bridge 070001 PTSID 2604M

Hi Nicole,

Attached please find the signed concurrence form. Apologies for not getting this to you as soon as I reviewed it. I'm planning my wedding and things have kicked into higher gear the past few weeks!

Have a great day,

Lauren M. "Maggie" Sager (she/her/hers)

Environmental Specialist, Habitat Conservation

Habitat and Ecosystem Services Division

Greater Atlantic Region

James J. Howard Marine Sciences Laboratory - Sandy Hook, NJ

NOAA Fisheries | U.S. Department of Commerce

www.fisheries.noaa.gov [fisheries.noaa.gov]

On Fri, Apr 2, 2021 at 9:26 AM Leporacci, Nicole (DOT) <Nicole.Leporacci@dot.ri.gov> wrote:
Good Morning Maggie,

Please find attached RIDOTs cover letter and the documentation regarding the Essential Fish Habitat (EFH) under the Federal Highway Administration (FHWA) Greater Atlantic Fisheries Office (GARFO) Programmatic Essential Fish Habitat Consultation program for the rehabilitation of the Washington Bridge North (RIDOT Bridge No. 070001) structure which carries Interstate 195 (I-195) westbound and local roadways over the Seekonk River, and the construction of associated new on and off ramps in Providence and East Providence.

Please let us know if you have any questions or need more information. We look forward to your response. Thank you!

Best,
Nicole

Nicole Lineberry (Leporacci)
Senior Environmental Scientist
Natural Resources Unit, RIDOT
E: nicole.leporacci@dot.ri.gov



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**Appendix L – USACE NED – CWA Section
404 and Sections 10 and 408 of the
Rivers and Harbors Act Updated
Consultation**



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REPLY TO
ATTENTION OF

DEPARTMENT OF THE ARMY
NEW ENGLAND DISTRICT, CORPS OF ENGINEERS
696 VIRGINIA ROAD
CONCORD, MASSACHUSETTS 01742-2751

March 24, 2022

Regulatory Division
File Number: NAE-2020-01204

Nicole Lineberry (Leporacci)
Rhode Island Department of Transportation
2 Capitol Hill, Room 360
Providence, RI 02903-1124
nicole.leporacci@dot.ri.gov

Dear Ms. Leporacci:

PROPOSED WORK/LOCATION: Washington Bridge, Seekonk River, Providence and East Providence, RI

We have reviewed your proposal to perform work within Corps of Engineers jurisdiction. We have assigned this file number **NAE-2020-01204**. Please reference this number in any future correspondence with us.

Since your project may have only minimal individual and cumulative impacts on waters and wetlands of the United States, it is authorized by the Corps of Engineers under the Rhode Island General Permits (GPs). This authorization does not obviate the need to obtain other federal, state, or local approvals. You are responsible for ensuring that the work meets the terms and conditions of the RI GPs. We have recorded this project as permittee self-verification of the RI GPs in our database. You must perform this work in compliance with the following special condition:

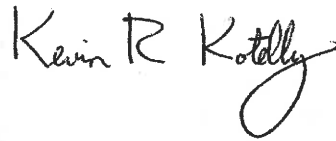
Work/usage allowed under this permission must proceed in a manner that avoids interference with the inspection, operation, and maintenance of the federal project.

This authorization expires on March 3, 2022. You must commence or be under contract to commence the work authorized herein by March 3, 2022, and complete the work by March 3, 2023. If not, you must contact this office to determine the need for further authorization before beginning or continuing the activity. We recommend that you contact us before this authorization expires to discuss permit reissuance. Please contact us immediately if you change the plans or construction methods for work within our jurisdiction. We must approve any changes before you undertake them.



Please contact me at (978) 318-8703 if you have any questions.

Sincerely,

Handwritten signature of Kevin R. Kotelly in black ink.

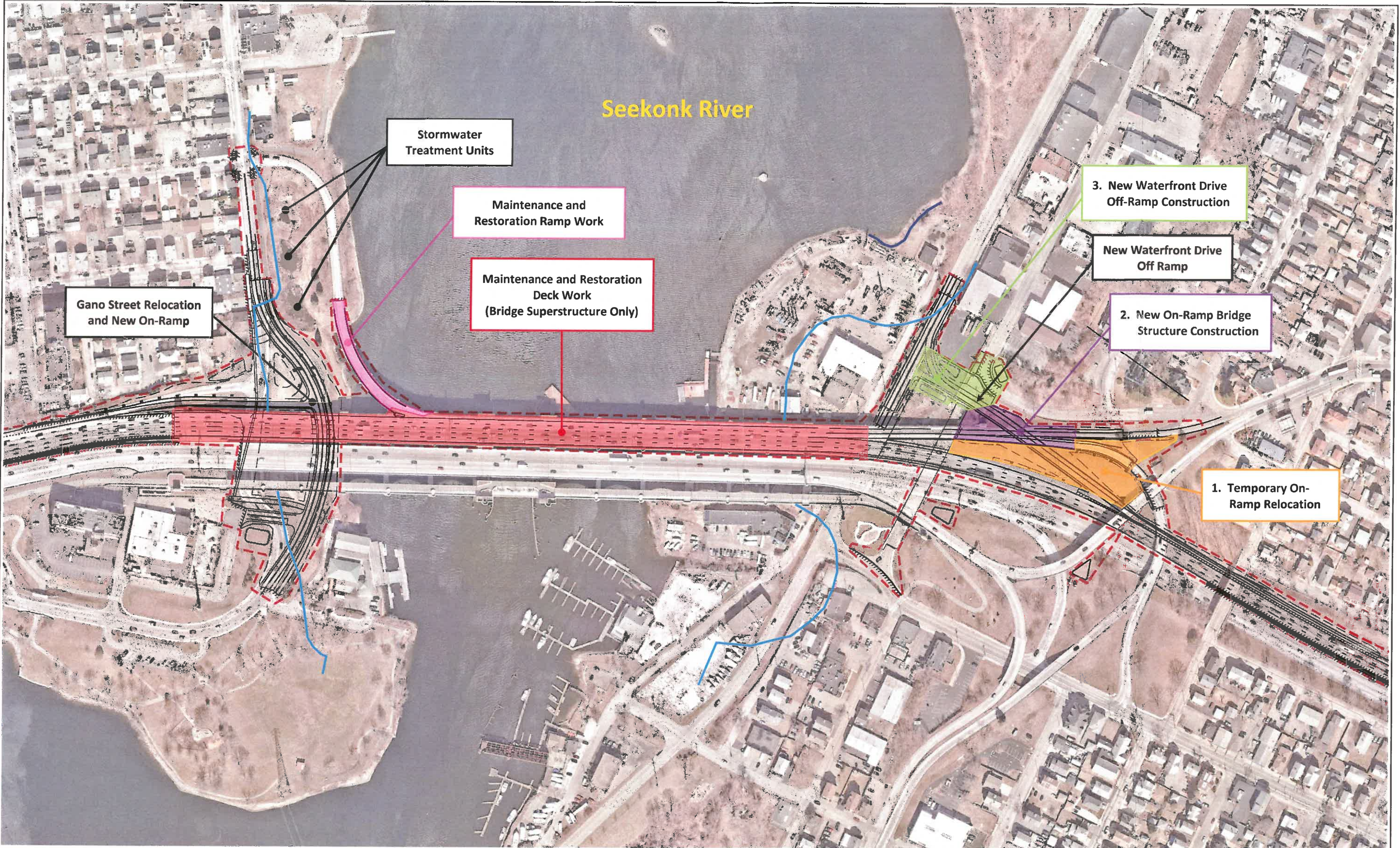
Kevin R. Kotelly, P.E.
Chief, Permits & Enforcement Branch
Regulatory Division

Enclosure (plans)

cc:

alisa.richardson@dot.ri.gov

erik.johnstone@dot.ri.gov



Seekonk River

Stormwater Treatment Units

Maintenance and Restoration Ramp Work

Maintenance and Restoration Deck Work (Bridge Superstructure Only)

Gano Street Relocation and New On-Ramp

3. New Waterfront Drive Off-Ramp Construction

New Waterfront Drive Off Ramp

2. New On-Ramp Bridge Structure Construction

1. Temporary On-Ramp Relocation



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RI DOT Washington Bridge Improvements – Providence and East Providence, RI
Identification of “Phased” Work Activities

- Project Limits (Approx.)
- Coastal Feature Edge (In Part, Approx.)
- CRMC 200' Jurisdictional Limit (In Part, Approx.)

ATC

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From: [Kotelly, Kevin R CIV USARMY CENAE \(USA\)](#)
To: [Scott Hobson](#); [Richardson, Alisa \(DOT\)](#)
Cc: [Jeff Klein](#); [Chelsea Glinka](#); [Leporacci, Nicole \(DOT\)](#); [Johnstone, Erik \(DOT\)](#)
Subject: RE: [EXTERNAL] : RE: Washington Bridge, Providence and East Providence, RI - USACE NED Follow-up Consultation
Date: Wednesday, November 24, 2021 2:14:40 PM
Attachments: [image001.jpg](#)
[image002.gif](#)

Scott, temporary spuds associated with a barge would qualify for self-verification of our RIGP 2 – Repair and Maintenance. You can proceed the work.

Kevin R. Kotelly, P.E.
US Army Corps of Engineers
696 Virginia Road
Concord, Massachusetts 01742-2751
Tel 978-318-8703
Cell 978-578-6406
kevin.r.kotelly@usace.army.mil

From: Scott Hobson <shobson@vhb.com>
Sent: Tuesday, November 16, 2021 12:04 PM
To: Richardson, Alisa (DOT) <Alisa.Richardson@dot.ri.gov>; Kotelly, Kevin R CIV USARMY CENAE (USA) <Kevin.R.Kotelly@usace.army.mil>
Cc: Jeff Klein <JKlein@VHB.com>; Chelsea Glinka <CGlinka@VHB.com>; Leporacci, Nicole (DOT) <Nicole.Leporacci@dot.ri.gov>; Johnstone, Erik (DOT) <erik.johnstone@dot.ri.gov>; Wierbonics, Michael S CIV USARMY CENAE (USA) <Michael.S.Wierbonics@usace.army.mil>; Skolnick, Charlotte R CIV USARMY CENAE (USA) <Charlotte.R.Skolnick@usace.army.mil>
Subject: [Non-DoD Source] RE: [EXTERNAL] : RE: Washington Bridge, Providence and East Providence, RI - USACE NED Follow-up Consultation

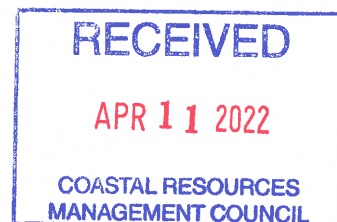
Thank you, All!

Please note, though, that our inquiry pertains to whether an application would be required at all under USACE jurisdiction, given the redesign and lack of in-water work.

Thank you.

Scott Hobson
Senior Ecologist

P 401.457.7824
www.vhb.com



From: Richardson, Alisa (DOT) <Alisa.Richardson@dot.ri.gov>
Sent: Tuesday, November 16, 2021 11:56 AM
To: Kotelly, Kevin R CIV USARMY CENAE (USA) <Kevin.R.Kotelly@usace.army.mil>; Scott Hobson <shobson@vhb.com>
Cc: Jeff Klein <JKlein@VHB.com>; Chelsea Glinka <CGlinka@VHB.com>; Leporacci, Nicole (DOT) <Nicole.Leporacci@dot.ri.gov>; Johnstone, Erik (DOT) <erik.johnstone@dot.ri.gov>; Wierbonics,

Michael S CIV USARMY CENAE (USA) <Michael.S.Wierbonics@usace.army.mil>; Skolnick, Charlotte R CIV USARMY CENAE (USA) <Charlotte.R.Skolnick@usace.army.mil>

Subject: RE: [EXTERNAL] : RE: Washington Bridge, Providence and East Providence, RI - USACE NED Follow-up Consultation

Kevin,

Thank you.

VHB,

We've been coordinating with ACOE and have just recently developed a RIDOT specific checklist for you so that you know you have a complete application upon submittal.

Thank you,

Alisa Diaz Richardson, MS, PE, PMP

Acting Administrator
Environmental Division

401-479-1327

www.dot.ri.gov

RIDOT logo - Signature



From: Kotelly, Kevin R CIV USARMY CENAE (USA) <Kevin.R.Kotelly@usace.army.mil>

Sent: Tuesday, November 16, 2021 11:20 AM

To: Scott Hobson <shobson@vhb.com>

Cc: Klein, Jeffrey <JKlein@VHB.com>; Chelsea Glinka <CGlinka@VHB.com>; Leporacci, Nicole (DOT) <Nicole.Leporacci@dot.ri.gov>; Richardson, Alisa (DOT) <Alisa.Richardson@dot.ri.gov>; Johnstone, Erik (DOT) <erik.johnstone@dot.ri.gov>; Wierbonics, Michael S CIV USARMY CENAE (USA) <Michael.S.Wierbonics@usace.army.mil>; Skolnick, Charlotte R CIV USARMY CENAE (USA) <Charlotte.R.Skolnick@usace.army.mil>

Subject: [EXTERNAL] : RE: Washington Bridge, Providence and East Providence, RI - USACE NED Follow-up Consultation

Hi Scott, I've been informed by RIDOT that their applications should be coordinated with RIDOT first and then RIDOT applies to the Corps. It saves time and helps RIDOT track environmental compliance. I'm copying my RIDOT contacts on this email.

Regards,
Kevin R. Kotelly, P.E.
US Army Corps of Engineers
696 Virginia Road
Concord, Massachusetts 01742-2751
Tel 978-318-8703
Cell 978-578-6406
kevin.r.kotelly@usace.army.mil

From: Scott Hobson <shobson@vhb.com>
Sent: Tuesday, November 16, 2021 8:54 AM
To: Kotelly, Kevin R CIV USARMY CENAE (USA) <Kevin.R.Kotelly@usace.army.mil>
Cc: Jeff Klein <JKlein@VHB.com>; Chelsea Glinka <CGlinka@VHB.com>
Subject: [Non-DoD Source] FW: [External] RE: Washington Bridge, Providence and East Providence, RI - USACE NED Follow-up Consultation

Hi Kevin,

Per guidance from Mike Wierbonics, we are pleased to forward the request described below with its accompanying graphics.

Thank you, and please feel free to let me know if you should require additional information or would like to schedule a virtual meeting.

Sincerely,
Scott

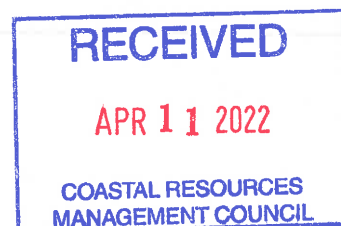
Scott Hobson
Senior Ecologist

P 401.457.7824
www.vhb.com

From: Wierbonics, Michael S CIV USARMY CENAE (USA) <Michael.S.Wierbonics@usace.army.mil>
Sent: Tuesday, November 16, 2021 8:23 AM
To: Scott Hobson <shobson@vhb.com>
Cc: Jeff Klein <JKlein@VHB.com>; Chelsea Glinka <CGlinka@VHB.com>
Subject: [External] RE: Washington Bridge, Providence and East Providence, RI - USACE NED Follow-up Consultation

Hi Scott,
Please forward your inquiry to Rhode Island Branch Chief, Kevin Kotelly at
kevin.r.kotelly@usace.army.mil
Thanks

From: Scott Hobson <shobson@vhb.com>
Sent: Monday, November 15, 2021 6:08 PM



To: Wierbonics, Michael S CIV USARMY CENAE (USA) <Michael.S.Wierbonics@usace.army.mil>
Cc: Jeff Klein <JKlein@VHB.com>; Chelsea Glinka <CGlinka@VHB.com>
Subject: [Non-DoD Source] Washington Bridge, Providence and East Providence, RI - USACE NED Follow-up Consultation

Hi Mike,

As a follow-up to my voicemail of November 2, 2021, I thought I would send an email expanding on the information left in the message. Our firm is working with RIDOT on improvements to the Washington Bridge, which carries I-195 over the tidal waters of the Seekonk River between Providence and East Providence, RI. A Categorical Exclusion (CE) Determination Project Narrative that was filed previously for the project, as designed at that time, listed the USACE permits that would likely be required. The project proposed in-water work, and the Seekonk River is associated with a federal navigation channel, so the authorities for which permits would likely need to be obtained from USACE were identified in the CE as Section 404 of the Clean Water Act, Section 10 of the Rivers and Harbors Act of 1899, and Section 408 (33 USC 408).

Our firm is part of the design-build team that was selected for the project, and we have redesigned portions of the project to now completely avoid in-water and in-wetland work project-wide, with the exception of the temporary use of spud barges needed for aerial work on the Washington Bridge superstructure. It is our understanding that the federal navigation channel is 16 feet deep and that the protective zone under Section 408 would therefore include 48 feet on either side of the channel. Given that no in-water work is proposed, we respectfully request concurrence that Section 404 and Section 10 permitting will not be required, and we respectfully request a determination as to whether Section 408 permitting would be required for the use of temporary spud barges. It is unclear at this time whether the barges would need to be moored within the jurisdictional area of the federal navigation channel, but they would be moveable (USCG coordination has occurred and will continue to occur through construction). We attended a joint RIDEM/CRMC project permitting meeting on October 13, 2021, and it was determined by RIDEM's water quality specialist that Section 401 permitting would not be required for the project as redesigned.

Please find attached for reference two schematic graphics that illustrate the general project area. We would be pleased to provide additional information if needed upon request. If you feel that a virtual meeting would be helpful, then we would be glad to schedule one, likely with attendees from RIDOT and FHWA (and with RIDEM if you would like).

Thank you very much for your attention to this request.

Scott

Scott Hobson
Senior Ecologist



1 Cedar Street
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shobson@vhb.com

Engineers | Scientists | Planners | Designers
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This communication and any attachments to this are confidential and intended only for the recipient(s). Any other use, dissemination,

Appendix M – Applied Bio-Systems, Inc. Coastal Feature Delineation Report



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APPLIED BIO-SYSTEMS , Inc.

P.O. BOX 985; WEST KINGSTON, RI 02892

Tel: 401-783-6740

Fax: 401-284-2004

wetlands@absinc.necoxmail.com

March 2, 2022

Jeff Klein, PE
VHB
1 Cedar Street, Suite 400
Providence, Rhode Island 02903-1023

Re: Washington Bridge Coastal Feature Delineations, Providence and East Providence, Rhode Island

Dear Mr. Klein:

On February 10 and 24, 2022, Applied Bio-Systems, Inc. completed Coastal Feature delineations on these sites located along the Seekonk River near the Washington Bridge in Providence and East Providence, Rhode Island (See Figure 1). There are three areas where Coastal Feature Delineations were conducted. Please note that since this was a Coastal Feature delineation, the flags were placed at the top of bank and the top of rip rap, the most inland edges of Coastal Feature. The attached sketches are approximate locations of the Coastal Feature delineations (See Figures 3 and 4).

The Coastal Feature delineation was based, as applicable, on field methods employed by *RI Coastal Resources Management Council - Coastal Resources Management Program, as amended*; the *CRMC Metro Bay Special Area Management Plan, as amended*; and the *Army Corps of Engineers 1987 Wetland Delineation Manual, as amended* with the *Regional Supplement to the Corps of Engineers Wetland Delineation Manual: North central and Northeast, Version 2.0, as amended*.

Coastal Feature Delineations

The Coastal Features are the top of bank and top of man-made shoreline protection (mostly rip rap), which are adjacent to the Seekonk River. The Seekonk River is classified by CRMC as a Type 4 water (Multi-Purpose Waters) and a Type 6 water (Industrial Waterfronts and Commercial Navigation Channels).

100 Series at Coastal Feature #8: This delineation is at the southeast corner of the bridge near the Motoring Technical Training Institute (MTTI). The Coastal Features are the top of bank / top of rip rap for this delineation. The top of rip rap is present at the start of the Coastal Feature



Delineation and closest to the bridge. The southern end of this delineation is a swale that is currently inundated with water from a stormwater outfall adjacent to Waterfront Drive. This shore is adjacent to the coastal bank that is vegetated. Some of the plants present at this location includes high tide bush (*Iva frutescens*), common reed (*Phragmites australis*), sedge (*Carex* sp.), and goldenrod (*Solidago* sp.). Flagging numbered 100-116 delineates the most inland edge (top) of the coastal bank / rip rap.

200 Series at Coastal Feature #10: This delineation is at the northeast corner of the bridge and just north of Moran Environmental Recovery. The Coastal Feature at this location is the top of bank. This delineation started at the southern end along the fencing and finished at the northern end near the headwall. There is a concentric salt marsh along the shoreline in this location and the vegetation includes high tide bush, sedge, and saltmarsh cordgrass (*Spartina alterniflora*). Flagging numbered 200-210 delineates the most inland edge (top) of the coastal bank.

300 Series at Coastal Feature #12: This delineation is further north of the 200 Series along Waterfront Drive and near the old iron (red) bridge along the eastern bank of the Seekonk River. The Coastal Feature at this location is the top of bank. This delineation started at the northern end and finished to the south near the headwall. The plants present at this location include black locust (*Robinia pseudoacacia*), red oak (*Quercus rubra*), Asian bittersweet (*Celastrus orbiculatus*), and Tatarian honeysuckle (*Lonicera tatarica*). Flagging numbered 300-312 delineates the most inland edge (top) of the coastal bank.

Coastal Feature Identifications

In areas where Coastal Feature Delineations were not needed, the Coastal Features were still identified and shown on Figures 2, 3 and 4. See attached photographs at the end of this report.

CRMC has jurisdiction over all Coastal Feature types as well as an additional 200-foot jurisdictional area extended inland from the inland edge of the coastal feature (top of bank and/or top of manmade shoreline protection). Any alterations proposed within this area will need prior approval from CRMC. The Cities of Providence and East Providence may have additional wetland requirements.

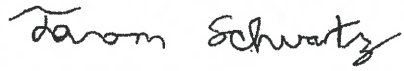
RIDEM Freshwater Wetland Feature

Coastal Feature #11 is a freshwater pond within RIDEM jurisdiction. This body of water is a man-made depression, and it is a triangular water area bounded to the north and south by old railroad berms. The water quality of this pond appears to be poor, and it has no inlet or outlet. This pond is not surrounded by any bordering wetland. This pond is larger than ¼ acre in size, so RIDEM would assign a 50-Foot Perimeter Wetland extended outward from the edge of water.

This letter is the sole opinion of Applied Bio-Systems, Inc. and is not to be construed in any way as an authorization from any regulatory agency. Please note that as of the date of this letter, the coastal feature delineations have not been verified by CRMC. CRMC is the ultimate authority in deciding the edge of coastal wetland areas and their jurisdictional boundaries in this location. If

there are any questions regarding this letter or if you require further assistance, please contact my office.

Sincerely,

A handwritten signature in black ink that reads "Jason Schwartz". The signature is written in a cursive style with a large initial 'J'.

Jason Schwartz
Senior Environmental Scientist

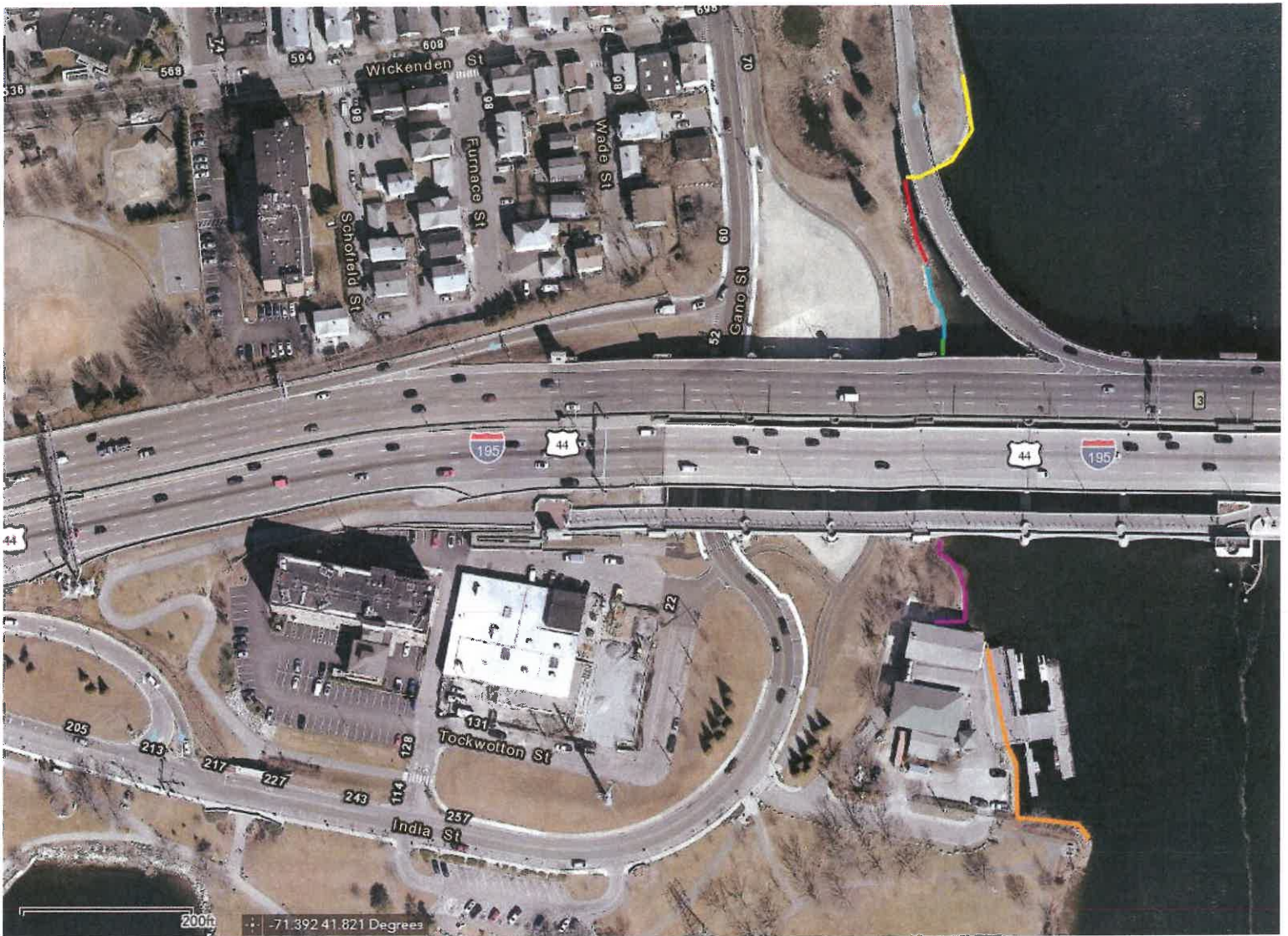


Figure 1. Project Location Area for Washington Bridge, Providence and East Providence, Rhode Island









Washington Bridge
Providence, Rhode Island
East Providence, Rhode Island

Figure 2. Coastal Features for the West Side of the Washington Bridge, Providence, Rhode Island



Approximate location of Coastal Features. For survey use only.

-  Coastal Feature #1: Concrete block revetment
-  Coastal Feature #2: Deteriorating rip rap
-  Coastal Feature #3: Eroding bank
-  Coastal Feature #4: Concrete structure / deteriorating rip rap
-  Coastal Feature #5: Vertical stone wall
-  Coastal Feature #6: Rip rap revetment against stone wall



Please note: Coastal Feature Delineations were not required at any of these locations.

Figure 3. Coastal Features for the East Side of the Washington Bridge, East Providence, Rhode Island



Approximate location of Coastal Features. For survey use only.

- Coastal Feature #7: Vertical stone wall
- Coastal Feature #8: Top of bank / Top of rip rap. Coastal Feature Flags #100-116
- Coastal Feature #9: Rip rap
- Coastal Feature #10: Top of bank. Coastal Feature Flags #200-210

Please note: Coastal Feature Delineations were required only at Coastal Features #8 and #10.

Figure 4. Coastal Features for the Area Northeast of Washington Bridge along Waterfront Drive, East Providence, Rhode Island



Approximate location of Coastal Features. For survey use only.

- Coastal Feature #11: Edge of Pond
- Coastal Feature #12: Top of bank. Coastal Feature Flags #300-312.



Please note: Coastal Feature Delineation was required just at Coastal Feature #12.

Representative Photographs of Coastal Features



Photo 1: Coastal Feature #1 (Concrete block revetment) and Coastal Feature #2 (Deteriorating rip rap) at northwest corner of bridge. See Figure 2.



Photo 2: Coastal Feature #3 (Eroding bank) at northwest corner of bridge. See Figure 2.



Photo 3: Coastal Feature #4 (Concrete structure / deteriorating rip rap) at northwest corner of bridge. See Figure 2.

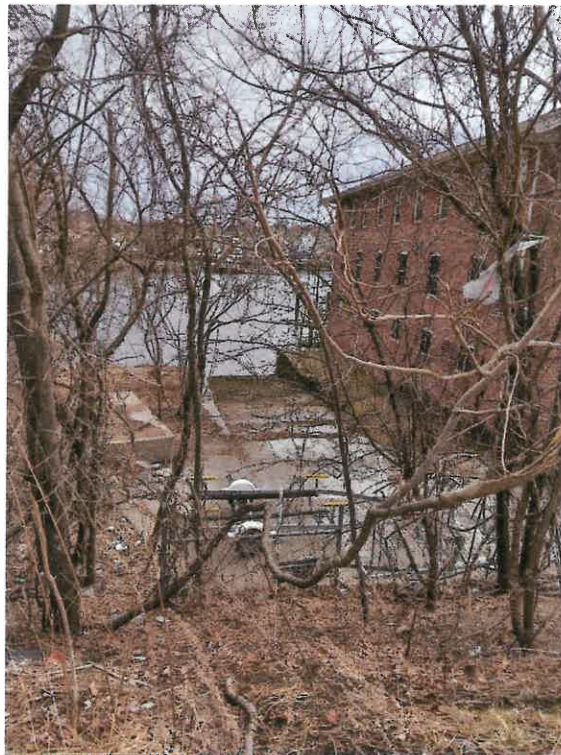


Photo 4: Coastal Feature #5 (Vertical stone wall) at southwest corner of bridge. See Figure 2.

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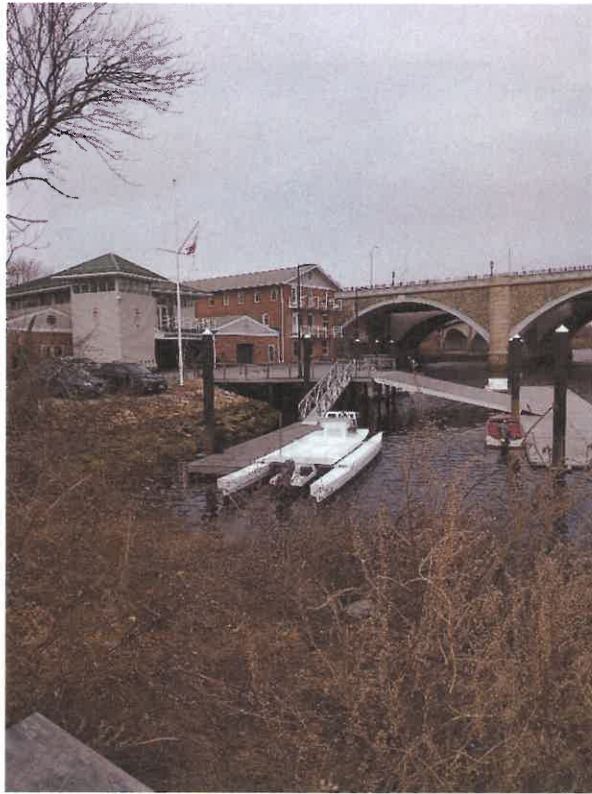


Photo 5: Coastal Feature #6 (Riprap revetment against stone wall) at southwest corner of bridge. See Figure 2.

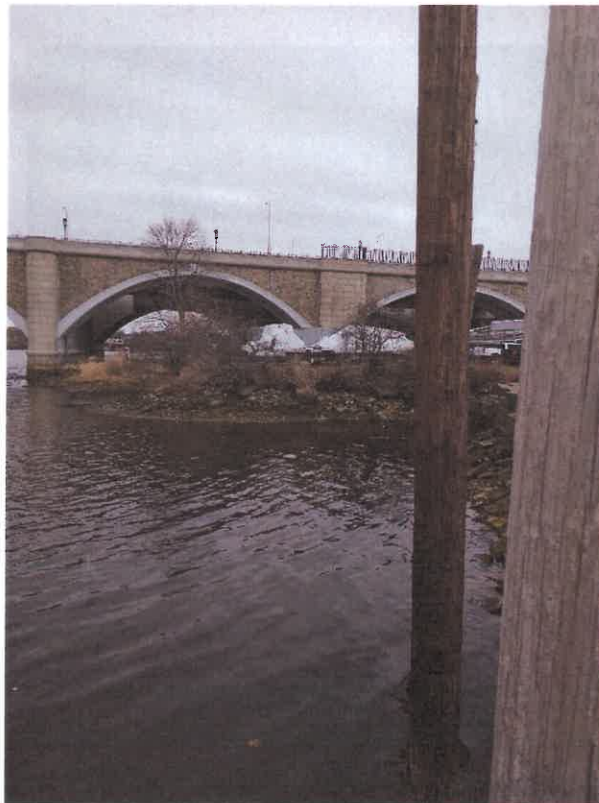


Photo 6: Coastal Feature #7 (Vertical stone wall) and Coastal Feature #8 (Top of bank / top of rip rap) at southeast corner of bridge. See Figure 3.



Photo 7: Looking across the channel to Coastal Feature #9 (Rip rap) at the northeast corner of the bridge. See Figure 3.

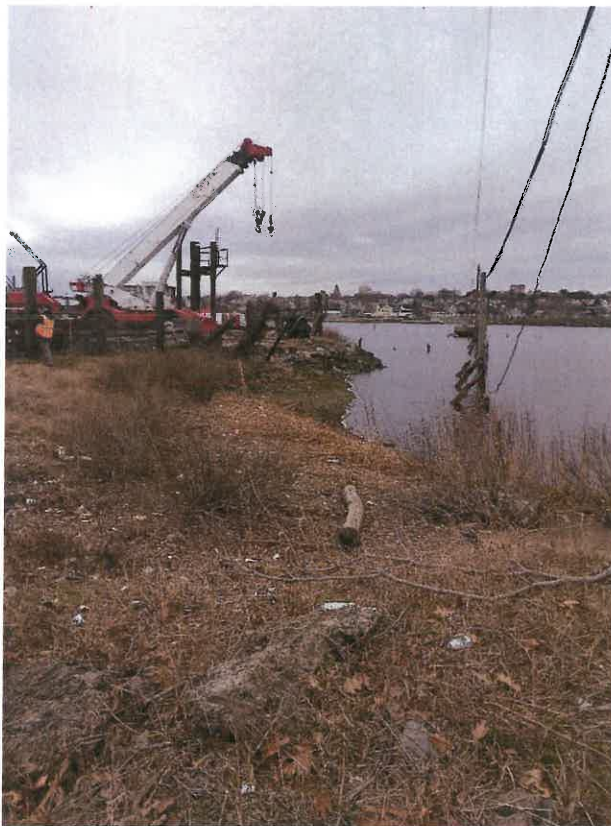


Photo 8: Coastal Feature #10 (Top of bank) at the northeast corner of bridge. See Figure 3.

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Photo 9: Coastal Feature #11 (Edge of pond) to the north of Photo 8 and adjacent to Waterfront Drive. See Figure 4.



Photo 10: Coastal Feature #12 (Top of bank) to the north of Photo 9 and along the eastern bank of the Seekonk River. See Figure 4.

Appendix N – Site Photographs



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Coastal Inlet Southerly of Washington Bridge, East Providence



Photo 1. Northeasterly view of coastal inlet located southerly of Washington Bridge and field delineated to accurately reflect the 200' Contiguous Area for the intersection of Warren Avenue and Valley Street.



Photo 2. Northwesterly view near mouth of coastal inlet described in Photo 1 above. Note eroded and incised face.



Photo 3. Westerly view of coastal inlet, as taken from its easternmost terminus. The inlet was deeply cut in surrounding banks, and a stormwater outfall was present at the inlet's eastern end.

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Coastal Wetland Northwest of Waterfront Drive Intersection with Proposed Off-Ramp, East Providence



Photo 4. West/southwesterly view of saltmarsh fringe at area field-delineated to accurately reflect the 200' Contiguous Area at the proposed Waterfront Drive Off-Ramp with Waterfront Drive.



Photo 5. Northwesterly view of the low saltmarsh fringe along the area referenced in Photo 4, as taken from approximately the same location. Hightide bush (*Iva frutescens*), saltmarsh cordgrass (*Spartina alterniflora*), and sea lavender (*Limonium carolinianum*) were present. The elevated embankments of the former rail lines are visible in the background, serving as the former approaches to the defunct, steel railroad bridge.



Photo 6. Northerly view of low saltmarsh fringe and eroded shoreline, northerly of that shown in Photo 5.

Coastal Features West of Proposed Valley Street Connector, East Providence



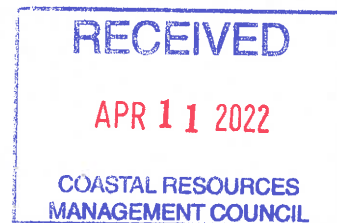
Photo 7. Southerly view of shoreline along elevated embankments of former rail line, serving as the northern approach to the defunct, steel railroad bridge. Shoreline segment at left is southerly-most of the shoreline delineated for the proposed Valley Street Connector.



Photo 8. Northerly shoreline view taken from approximately the same location as in Photo 7, representing the shoreline in southerly portions of the delineation. The feature edge was delineated as being landward, above a topographic bench out of the viewport to the right.



Photo 9. North/northeasterly view of elevated, artificial landforms along the northerly portion of the delineation. The feature edge was delineated at the top of the landforms, along the eroded embankment crest.



Manmade Shoreline Under Washington Bridge Near Proposed Gano Street Relocation, Providence



Photo 10. Southerly view under the Washington Bridge, showing I-195 Eastbound (EB) and Westbound (WB) pier foundations, with the Hunter S. Marston Boathouse shown in the background.



Photo 11. Similar view as in Photo 10 but taken from a vantage point further north to show the complete length of the foundations.



Photo 12. Southerly view showing a close-up of the EB pier foundation and significant elevation drop to the intertidal substrates shown in Photo 10.



Photo 13. Southerly view of abutment shown in Photo 12 but shifted slightly landward to show massiveness of foundations and adjoining rip rap slope protection to the right.



Photo 14. North/northeasterly view of massive foundations, piers, and pier walls forming the Manmade Shoreline. The relationship of the rip-rap slope protection under the Bridge, as referenced in the document, is clearly visible.



Photo 15. Northerly view of shoreline, where rip rap meets tidal waters between the EB and WB foundations, representing sole location under bridge where concrete walls are not present. Column in foreground is that shown as last column in Photo 14, abutting massive pier wall to the north.

Rip-Rap Slope Protection Against Manmade Shoreline at Proposed Gano Street Relocation, Providence



Photo 16. Northerly view of rip-rap slope protection abutting massive concrete bridge structures and extending upslope to Blackstone River Bikeway.



Photo 17. Northwesterly view of slope protection, as taken from concrete bridge structures and looking upslope towards split-rail fence along Bikeway.



Photo 18. Southerly view of slope protection present landward of the massive WB pier wall.



Photo 19. Northerly view of rip rap slope protection shown as opposing view as that in Photo 18. The full extent of the WB pier wall and presence of landward rip rap is shown. For reference, the pier is the same as that shown in Photos 14 and 15.



Photo 20. Easterly view showing southerly extent of rip-rap slope protection as being limited to footprint (dripline) of the bridge deck above. As indicated in the document, the rip-rap slope protection appears as a rectangular area extending landward of the Manmade Shoreline.

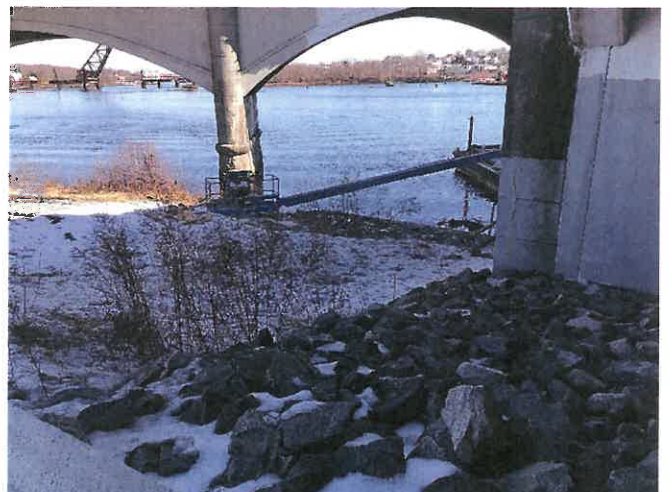
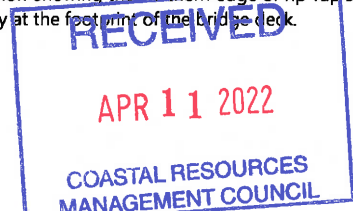


Photo 21. Northeasterly view showing the northern edge of rip-rap slope protection, ending abruptly at the footprint of the bridge deck.



Coastal Features and Upper Embankment Northerly of Washington Bridge, Providence



Photo 22. South/southeasterly view north of the Bridge showing area between the coastal feature edge and Bikeway, and northerly of rip rap limits shown in Photo 21.

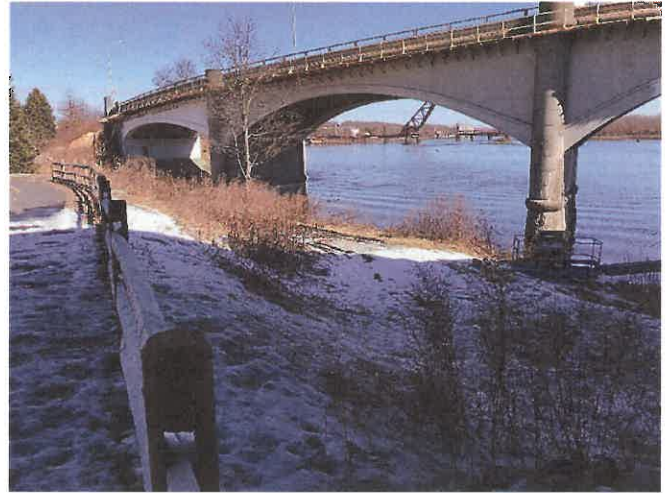


Photo 23. Northerly view of zone described in Photo 22. The maintenance access road for the bridge is visible on the lower topographic bench.



Photo 24. Southerly view of eroded feature edge north of the Bridge. The pier visible near the foreground supports the Gano Street Off-Ramp.

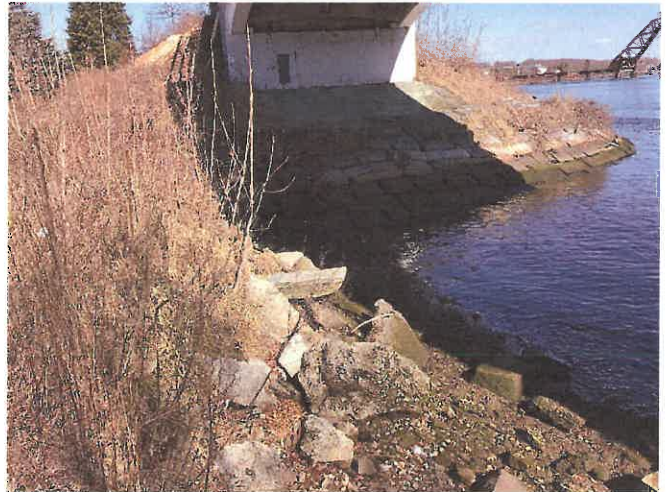


Photo 25. Northerly view of feature and stone armor protecting the earthen embankments of the Gano Street Off-Ramp. Photo was taken opposite the Off-Ramp pier shown in Photo 24.

Water Quality Ponds (Sedimentation Basin) at Proposed Gano Street Relocation, Providence



Photo 26. Northwesterly view of Sedimentation Basin, the upper of the three Gano Street water quality ponds, indicating extent of sediment accumulation.



Photo 27. Southerly view of severe sediment accumulation. Flow from the northern inlet is shown at lower right, and the mouth of flow from the western inlet is somewhat discernable two-thirds up image at right.



Photo 28. Southeasterly view of severe sediment accumulation, as taken from western inlet. The Gano Street Off-Ramp is visible in background.



Photo 29. Northwesterly view of northern inlet, with flow restricted by heavy sediment deposits.



Photo 30. Northeasterly view along northern edge of Sedimentation Basin showing how the depth of sediment accumulation has overtaken the original basin side slope and is nearly even in elevation with original woody landscape plantings.



Photo 31. Southwesterly view across upper and western portions of the Basin, showing breadth of heavy sediment accumulation. The project proposes to remove the accumulated sediment down to the concrete liner and to restore the Basin side slopes to original grades.



Water Quality Ponds (Storage Pond and Micropool) at Proposed Gano Street Relocation, Providence



Photo 32. Westerly view across the Storage Pond, the middle compartment of the water quality ponds. No work is proposed in this compartment.



Photo 33. Northwesterly view across the Micropool, the last of the compartments. The outlet structure is located out of the image viewport to the left. No work is proposed in this compartment.



Photo 34. Westerly view of the stone weir positioned between the Storage Pond and Micropool. The weir is proposed to be reshaped to original design specifications.

General Setting for Proposed Gano Street and Blackstone River Bikeway Relocation, Providence



Photo 35. Northerly view of Bikeway approach to Washington Bridge. The Gano Street and Bikeway Relocation will occur under this span. Note the elevated topography at right to separate the project from the Hunter S. Marston Boathouse, located out of the viewport to the immediate right.



Photo 36. Opposite (southerly) view of that shown in Photo 35. The elevated topography to the left will help ensure that secondary effects, such as errant stormwater runoff, do not impact the Boathouse property to the east (left). The end of the split rail fence is helpful for reference with Photo 35.



Photo 37. Southerly view of barren area under the Washington Bridge, where the Gano Street and Bikeway Relocation will occur. The proposed alignment will be approximately centered in the spans.



Photo 38. Southerly view of Washington Bridge Span 3 from outside the Bridge footprint, where the Gano Street and Bikeway Relocation will occur. The Bikeway will remain on the seaward (left) side of relocated Gano Street.



Photo 39. Southwesterly view under Washington Bridge to show the barren substrates on which the Gano Street Relocation will occur. The I-195 WB span is in the foreground.



Photo 40. Northwesterly view of barren area on which the Gano Street Relocation is proposed. No trees or shrubs will need to be cleared.

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Existing Parcel Characteristics at Proposed Valley Street Connector, East Providence



Photo 41. Easterly view from Waterfront Drive across parcel that will support the proposed Valley Street Connector. Valley Street is the road in the background on which the white vehicle is visible. The portion of Valley Street that bends sharply uphill to the east is shown at upper left of image.



Photo 42. Southeasterly view of parcel on which the Valley Street Connector is proposed to be constructed. The Valley Street Connector will occur entirely outside the 200' Contiguous Area, but this photo page was included from a stormwater management perspective to illustrate the extent of existing impervious surface present across the parcel.

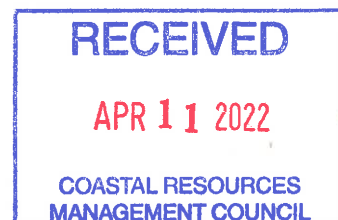


Photo 43. Northeasterly view across parcel shown in Photos 41 and 42, taken from the same vantage point. The parcel is significantly depressed in elevation below Waterfront Drive and Valley Street, as somewhat evident in this image and indicated by the poured concrete retaining wall at lower left of viewport.



Photo 44. Northerly view along Waterfront Drive showing general setting, concrete retaining wall, and elevation difference noted in Photo 43.

Appendix O – Debris Capture/Collection Measures for Bridge Work

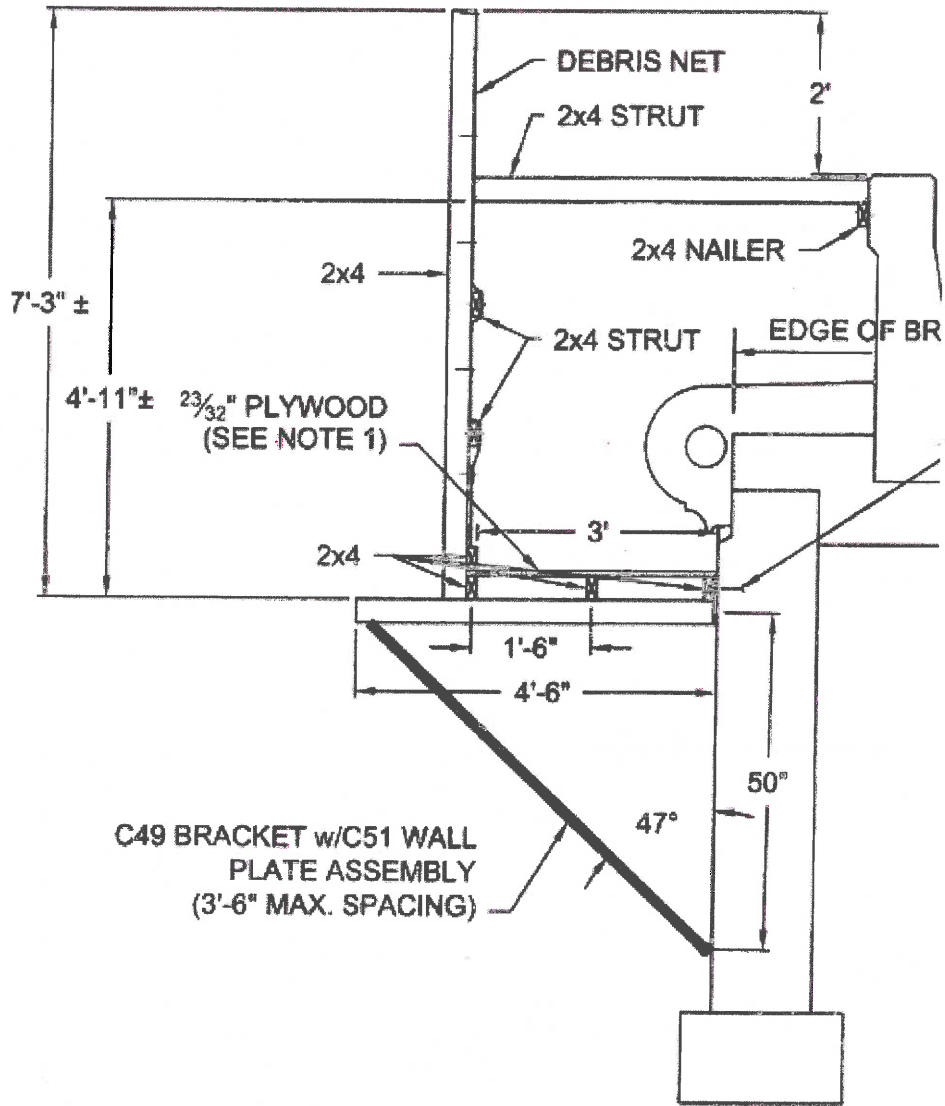


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Rhode Island Department of Transportation
Washington Bridge (I-195 Westbound) Rehabilitation
Providence and East Providence, RI

Debris Capture/Collection – Overhang Bracket



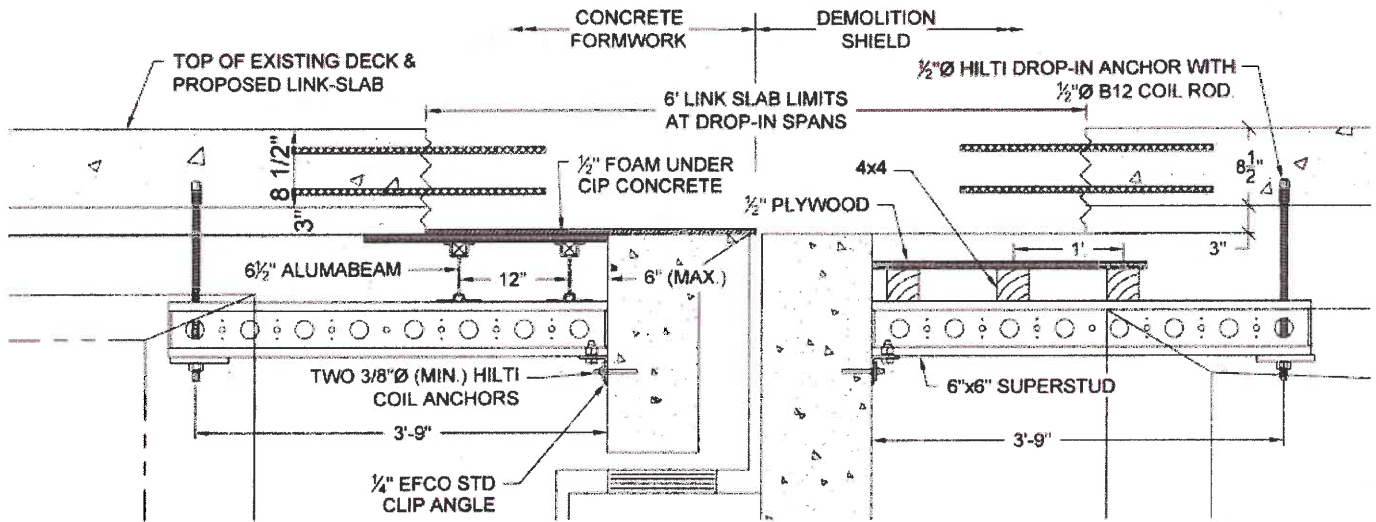
OVERHANG BRACKET
SCALE: 1/4"=1'-0"

Source: Barletta Engineering – Heavy Division



Rhode Island Department of Transportation
Washington Bridge (I-195 Westbound) Rehabilitation
Providence and East Providence, RI

Debris Capture/Collection – Link Slab Shielding



Source: Barletta Engineering – Heavy Division



Rhode Island Department of Transportation
Washington Bridge (I-195 Westbound) Rehabilitation
Providence and East Providence, RI

Debris Capture/Collection – Hanging Platform System



Source: Barletta Engineering – Heavy Division



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Appendix P – Project Plans (Bound Separately)

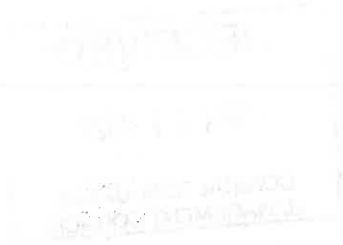


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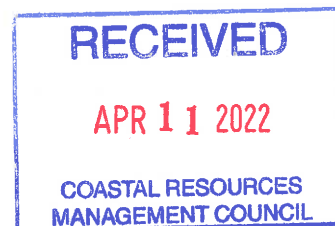
Appendix Q – Stormwater Management Plan (Bound Separately)



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**Appendix R – Long Term Stormwater
O&M Plan and Pollution Prevention and
Source Control (Bound Separately)**



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Appendix S – RIDOT Large-Site SWPPP (Bound Separately)



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