



STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

COASTAL RESOURCES MANAGEMENT COUNCIL

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

(401) 783-3370
FAX: (401) 783-3767

July 14, 2010

Coastal Resources Management Council
Michael M. Tikoian, Chairman
Stedman Government Center, Suite 3
4808 Tower Hill Road
Wakefield, RI 02879

Dear Chairman Tikoian:

Below please find a summary of the proposed changes to Chapter 1000: Existing Statutes, Regulations and Policies of the Ocean Special Area Management Plan. These comments were submitted at the June 22, 2010 full council hearing. Proposed changes are as follows:

1. Section 1010.1 - Add "from the mean high tide line" to further clarify the jurisdiction of the submerged lands act
2. Section 1010.1 - Paragraph 3 - change UNCLOS Article 22 to Article 21, which is the correct cite
3. Section 1020.1 - Add new section Paragraph 2 relating to Article 1 Section 17 of the RI Constitution and the Public Trust Doctrine
4. Section 1020.6 - The addition of three other criteria considered by the Energy Facility Siting Board to more accurately reflect its statutory duties
5. Section 1030.14 - Change the word "practical" to "practicable"
6. Please note the other redlined changes in the document were made after initial draft of the chapter but prior to approval by the subcommittee, and as reported out by the full council. I include them so that the council and the public can tract all the changes that were made.

Michael M. Tikoian
July 13, 2010
Page 2

Thank you for consideration in this matter.

Very truly yours,


Brian A. Goldman, Legal Counsel

BAG:jms