

April 24, 2025



Sent via electronic mail to: [cstaff1@crmc.ri.gov](mailto:cstaff1@crmc.ri.gov)

Coastal Resources Management Council  
O.S. Government Center  
4508 Tower Hill Road  
Room 116  
Wakefield, RI 02879

The Board of the Warren Land Trust has reviewed the CRMC permit application File Number 2024-12-004 from The Narragansett Electric Company (TNEC) for work along the E183-3 and F184-N-4/5 lines. The Warren Land Trust is the owner of several properties affected by this project. We are troubled about the proposed activities and their impact to the associated habitats, specifically regarding the impacts to the marshlands and wetlands along the Palmer River, in Warren, RI. Additionally, we are concerned that the proposed mitigation efforts associated with this project are inadequate. We request that additional measures be added to the draft application in order to minimize impacts to the wetland habitats. We additionally request mechanisms for further mitigation measures in case the impacts to the wetlands are greater than anticipated.

The Warren Land Trust recognizes the need for maintaining our energy infrastructure. Nonetheless, when these projects cross over saltwater and freshwater wetlands, this work must minimize negative impacts on these fragile habitats. These areas are already affected by human activities and increasingly by severe weather events. The Warren Land Trust are stewards of these endangered habitats. We have several projects underway – in collaboration with Save the Bay and the Natural Resources Conservation Service – to restore water flow over the marsh and protect it from further degradation.

We have reviewed the proposed compensatory mitigation measures in the permit application. These measures are ostensibly to address the immediate and permanent loss of wetlands from filling with concrete. However, we have already observed compaction of the high marsh peat as a result of preliminary activities performed this past winter from the use of constructing matting. The health of the high marsh – and its ability to absorb the impacts of storms and other climactic impacts – is directly tied to the height of this peat substrate. This was documented during a meeting on March 8, 2025 with representatives from RI Energy and Vanasse Hangen Brustlin Inc. (VHB), which Save the Bay also attended. We anticipate that this compression will significantly impair the ability of the high marsh plant systems to survive in these areas.

In the plan set submitted for the geotech boring activity, the Construction Mat Layout Detail (Detail #2) is clearly contrasted with the Construction Mat Bridge (Detail #5). Our observations during the installation of the matting appeared to indicate that the work did not conform to either one of these details. Most of the matting was constructed on top of perpendicular stringers which significantly increased the pressure from the weight of the mats and trucks and drill equipment. We

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Kate Pisano, President  
E. Jenny K. Flanagan, Treasurer  
Martha Antaya, Secretary

WARREN LAND TRUST  
P.O. Box 565, Warren, RI 02885  
[WarrenLCT.org](http://WarrenLCT.org)

Max Bliss, Trustee  
Anat Sagi, Trustee  
David Weed, Trustee

raised this issue at the time the mats were being installed but we were assured that this would not cause increase compaction of the marsh surface. As you can see from the attached photos of the surface after mat removal, our concerns were justified. We have already seen the spread of fiddler crab infestation into the depressed areas caused by the matting so we know that conditions have changed significantly. We request that the applicants prepare calculations of pressure per sq foot for the construction mat detail in the permit application versus the alternate layout that was used for both the access road and for bridge sections.

To address the impacts to the marsh from this project and specifically from the impacts of the construction matting, the Warren Land Trust – in consultation with Save the Bay – respectfully requests that the additional monitoring and mitigation efforts be required:

- 1) Conduct pre-construction elevation surveys of the marsh platform along the area where the construction mats are proposed to be installed to establish a baseline marsh platform elevation. This data will be used to indicate the level of marsh compaction as a result of the drilling phase. Upon completion of construction, conduct post-construction elevation surveys to determine the quantity and severity of marsh compaction and if additional mitigation measures are necessary.
- 2) **After construction matting is removed, either by hand or with a low ground pressure excavator, elevate the compacted peat.** After the mitigation measures have been implemented either by hand or with the low ground pressure excavation, conduct additional elevation surveys at the end of the first full growing season after construction activities are completed. This monitoring period should be used to assess persistent marsh compaction, additional subsidence, vegetation die-off, and impounded water to identify areas of marsh requiring additional mitigation.
- 3) If after one growing season, the post-construction elevation monitoring identifies compaction of the marsh, conduct additional mitigation of the degraded habitat to address additional wetlands degradation and/or loss caused by the matting and construction activities. **The Army Corps of Engineers should require 2 to 1 compensatory mitigation to offset the damage from the construction matting.** Additional mitigation could include restoration of the unvegetated depressions caused by prior utility corridor maintenance activities. Sediment addition could be carefully used to elevate these depressions to restore salt marsh function.
- 4) Include in the application formal language regarding the mitigation of the drilling activities in January of 2025 as discussed on the site visit with RI Energy, and outlined above. The permit for the drilling activities included hand raking of the salt marsh grasses to address any compacted peat. This technique will not be sufficient to mitigate the peat compaction.

**If post-work monitoring determines that the extent of marsh degradation and loss is greater than initially stated in the application, other compensatory mitigation sites should be identified to perform additional wetlands restoration.** If mitigation project sites

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cannot be identified on the Warren Land Trust property, we recommend using the two parcels adjacent to the northwest of the TNEC parcel proposed, both of which are currently owned by the Town of Warren, and are locations where historic salt marsh filling was performed at the same time as the filling which occurred at the site already proposed for wetlands restoration.

Respectfully submitted,

Katelyn Pisano, President  
Warren Land Trust  
P.O. Box 565, Warren, RI 02885  
[warrenlctri@gmail.com](mailto:warrenlctri@gmail.com) | [warrenlct.org](http://warrenlct.org)



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April 9, 2025



Sent via electronic mail to: [kevin.m.newton@usace.army.mil](mailto:kevin.m.newton@usace.army.mil)

Commander, U.S. Army Corps of Engineers, New England District  
Attention: Kevin Newton, Regulatory Division  
696 Virginia Road  
Concord, Massachusetts 01742

Dear Mr. Newton –

The Board of the Warren Land Trust has reviewed the Army Corps of Engineers permit application number NAE-2024-01914 from The Narragansett Electric Company (TNEC) for work along the E183-3 and F184-N-4/5 lines. The Warren Land Trust is the owner of several properties affected by this project. We are troubled about the proposed activities and their impact to the associated habitats, specifically regarding the impacts to the marshlands and wetlands along the Palmer River, in Warren, RI. Additionally, we are concerned that the proposed mitigation efforts associated with this project are inadequate. We request that additional measures be added to the draft application in order to minimize impacts to the wetland habitats. We additionally request mechanisms for further mitigation measures in case the impacts to the wetlands are greater than anticipated.

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Commander, U.S. Army Corps of Engineers, New England District

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