1.0 INTRODUCTION

On behalf of the City of Pawtucket, BETA Group, Inc. (BETA) is submitting a Category B Assent Application for the proposed Tidewater Landing Phase 1B Project (the Project) located at Assessor's Plat 23 Lots 599, 672, and 673 and a portion of Festival Pier located on Assessor's Plat 35A Lot 361 (the Site). The Site is located along Division Street, Portuguese Social Club Way, School Street, Tim Healey Way, and the Seekonk River. A Preliminary Determination (PD) was previously filed for the Project (File No. D 2021-02-063) during the proceedings associated with the permitting of the stadium complex on the opposite side of the Seekonk River. Another PD was previously filed for the Project (File No. D 2025-04-090) to provide sufficient information on existing conditions and Project details to the Coastal Resources Management Council (CRMC) to confirm a permitting pathway under the Metro Bay Region Special Area Management Plan (MB SAMP)[1] and provide additional information related to the Site and the Project per CRMC's direction within the previously issued PD. As per the recommendation of CRMC, the proposed pedestrian staircase from the intersection of Division Street and Pleasant Street to Taft Street and the pedestrian bridge over the Seekonk River have been removed from this Assent Application and will be submitted as separate Assent Applications. An Assent for the staircase was filed with the CRMC in October 2025 and resubmitted in December 2025.

The Project is the second phase of the overall project associated with the Tidewater Stadium Development (Phase 1A). Phase 1B of the Project is a public/private joint development that proposes the following as described in further detail in this report:

- Construction of two pathways, a Lower Riverwalk (primary ADA public access path) and an Upper Riverwalk (secondary non-ADA access trail). The upper path will consist of a stabilized aggregate and the lower path will consist of a combination of wooden boardwalk and asphalt paving to increase public visual access to the Seekonk River. The upper path will generally follow along an existing trail that begins at Festival Pier and extends northerly along the existing Narragansett Bay Commission utility easement;
- Construction of one (1) stormwater basin and associated stormwater control measures;
- Construction of one (1) underground sand filter infiltration chamber (UIC) system and associated stormwater control measures;
- Construction of the Tidewater East plaza;
- Restoration of uplands at the Site, including invasive species management and installation of native plantings;
- Restoration of the wetland, including removal of invasive species, increasing the size of the wetland, and planting native species; and
- Establishment of two (2) "future development" lots along Division Street, Portuguese Social Club Way and School Street. The lots are included in this Assent Application for planning purposes. The development of each lot will be submitted as separate Assent Modifications.

Work proposed as part of the Project will occur within 200 feet of jurisdictional wetland resources under the CRMC "Red Book" (650-RICR-20-00-1), and the Rhode Island Rules and Regulations Governing the Protection and Management of Freshwater Wetlands in the Vicinity of the Coast (650-RICR-20-00-9) including Coastal Wetland (650-RICR-20-00-1 Section 1.2.2.C), Manmade Shorelines (650-RICR-20-00-1 Section 1.2.2.F), Coastal Headlands, Bluffs and Cliffs (650-RICR-20-00-1 Section 1.2.2.D) and Buffer Zone (650-RICR-20-00-1 Section 1.1.11).

[1] Metro Bay Region Special Area Management Plan (650-RICR-20-00-5) Section 5.1 to 5.16

The Project will take place within the portion of Rhode Island subject to the CRMC's Urban Coastal Greenway's (UCG)[2] MB SAMP. The Project will accomplish several goals of the MB SAMP including increased public access to coastal waters, improvement of water quality via onsite vegetative stormwater treatment, underground sand filter infiltration chamber (UIC), installation of proprietary stormwater pretreatment devices, preservation and restoration of habitat, and the improvements of the aesthetic value of Rhode Island's urban shoreline. This Site is located in MB SAMP designated areas as Area of Particular Concern (APC), Development Zone, and Priority Lands C2, C3, and R1.

2.0 Site Description

2.1 Site Locus

The Site is primarily located on approximately the 12-acre grouping of the four (4) parcels along the Seekonk River. The three existing parcels, identified as Assessor's Plat 23 Lots 599, 672, and 673 will have lot lines administratively reconfigured, by the City, upon approval of the project. The Site also includes a portion of Assessor's Plat 35A Lot 361, which contains Festival Pier. For this Assent the lots will be identified as follows:

- Lot 1 – UCG Parcel (Reconfigured)
- Lot 2 – Wood Development Parcel (Reconfigured)
- Lot 3 – Pennrose Development Parcel (Reconfigured)
- Lot 4 – Festival Pier Parcel

The Site is located on the eastern side of the Seekonk River and is bound to the west by a tidally influenced portion of the Seekonk River, to the north by Division Street, to the east by School Street and Portuguese Social Club Way, Tim Healey Way and to the south by Festival Pier (Figure 1 – Site Locus). The Site is predominantly forested and undeveloped with vegetation consisting of primarily invasive / non-native species. Several informal walking paths are present, and the northern portion of the Riverwalk East Site is supported by a retaining wall (manmade shoreline) upgradient of the Seekonk River. Anthropogenic debris has been observed throughout this portion of the Site and includes tents, abandoned vehicles, garbage, and gravelly fill.

2.2 Environmental Resources

2.2.1 Wetlands and Waterways

BETA Group, Inc. (BETA) Wetland Scientists visited the project area east of the Seekonk River in Pawtucket, Rhode Island (the Site) on September 5, 2024 to assess the Site for the presence of jurisdictional wetland resources under the Rhode Island Freshwater Wetlands Rule (250-RICR-150-15-3), the Rhode Island Coastal Resources Management Council (CRMC) "Red Book" (650-RICR-20-00-1), and the Rhode Island Rules and Regulations Governing the Protection and Management of Freshwater Wetlands in the Vicinity of the Coast (650-RICR-20-00-9). Wetland delineations were conducted at the Site in accordance with the above-referenced rules and regulations and, where applicable, in accordance with the 1987 publication Corps of Engineers Wetlands Delineation Manual.

Wetland resource areas identified on the Site include Coastal Wetland (650-RICR-20-00-1 Section 1.2.2.C), Manmade Shorelines (650-RICR-20-00-1 Section 1.2.2.F), Coastal Headlands, Bluffs and Cliffs (650-RICR-20-00-1 Section 1.2.2.D) and Buffer Zone (650-RICR-20-00-1 Section 1.1.11). Although the Coastal Bluff

[2] Metro Bay Region Special Area Management Plan (650-RICR-20-00-5) Section 5.4

feature subject to CRMC's jurisdiction along this side of the Seekonk River was previously at elevation 6 feet (NGVD29) under the PD issued for the Tidewater Landing Project (Appendix A – Preliminary Determination), BETA's Site visit confirmed the presence of Coastal Wetland downgradient of this elevation. The Coastal Wetland generally consists of a tidal channel vegetated by common reed (*Phragmites australis*) and is located adjacent to degraded areas vegetated by a monoculture of Japanese knotweed (*Fallopia japonica*) that is likely former Coastal Wetlands impacted by anthropogenic disturbances (Appendix B – Wetland Delineation Letter of Findings).

2.2.2 Floodplains

According to FEMA Flood Insurance Rate Map (FIRM) Community Panel 44007C0307J, the Site is partially located within a Zone AE Flood Hazard with a base flood elevation of 12 feet (NAVD88) and a Zone VE Flood Hazard with a base flood elevation of 13 feet (NAVD88) (Figure 4 – FEMA FIRMette). Portions of the Site upgradient of these Flood Hazards are mapped as a Zone X / 0.2% chance flood hazard.

2.3 Protected Wildlife Habitat and Other Sensitive Areas

2.3.1 State Natural Heritage Areas

RIDEM GIS data indicates that the entirety of the Site is located within a Natural Heritage Area due to the presence of state-listed rare, threatened, and/or endangered plant and animal species. According to the Natural Heritage Report acquired for the Site (Appendix D – Protected Wildlife Documentation), the following species of concern are potentially present:

- Northern Diamondback Terrapin (*Malaclemys terrapin*)
- Salt Reedgrass/Big Cordgrass (*Spartina cynosuroides*)
- Tall White/Foxglove Beard-tongue (*Penstemon digitalis*)

These species were not directly observed at the Site by BETA; however, a more detailed wildlife evaluation would be required to confirm the current presence or absence of these species and any associated habitat features.

2.3.2 Federally Listed Species

According to the Official Species List dated November 10, 2025, provided by the U.S. Fish and Wildlife Service (USFWS) through the Information for Planning and Consultation (IPaC) system (Appendix D – Protected Wildlife Documentation), the Project is located within the range of the Monarch Butterfly (Danaus plexippus), a candidate species, and the Northern Long-eared Bat (Myotis septentrionalis), an endangered species. However, there are no critical habitats mapped in the vicinity of the Project.

According to the National Oceanic and Atmospheric Administration (NOAA) Essential Fish Habitat Mapper, the Site is located within Essential Fish Habitat and Habitat Areas of Particular Concern associated with the Seekonk River. The Habitat Areas of Particular Concern data layer indicates that habitat for the Summer Flounder (*Paralichthys dentatus*) exists in proximity to the Site. According to the Essential Fish Habitat data layer, the following fish species exist within the vicinity of the Project:

- Black Sea Bass (*Centropristis striata*);
- Bluefish (*Pomatomus saltatrix*);
- Little Skate (*Leucoraja erinacea*);
- Scup (*Stenotomus chrysops*);
- Summer Flounder (*Paralichthys dentatus*);
- Windowpane Flounder (*Scophthalmus aquosus*);

- Atlantic Butterfish (*Peprilus triacanthus*);
- Atlantic Herring (*Clupea harengus*);
- Atlantic Mackerel (*Scomber scombrus*);
- Winter Skate (*Leucoraja ocellata*);
- Winter Flounder (*Pseudopleuronectes americanus*);
- Red Hake (*Urophycis chuss*); and
- Longfin Inshore Squid (*Doryteuthis pealeii*).

2.3.3 CRMC-Identified Sensitive Areas

According to CRMC data (Figure 3 – Metro Bay Special Area Management Plan Map), the Site is located within areas designated as UCG Area of Particular Concern (APC) and Development Zone, and MB SAMP Priority Land C2 / C3 / R1.

2.4 Hazardous Materials

Historic and current land uses near the Project location primarily consists of commercial and residential properties. A search of potentially hazardous materials adjacent to the Site was conducted using RIDEM GIS data. According to this data, there are four (4) underground storage tanks adjacent to the Project location and one (1) permanently closed underground storage tank. These include:

- Merchants Tire (21 Division Street);
- B.V. Medical (279 School Street);
- Lawn Terrance Apartments (180-226 Pleasant Street);
- E&A Tavern (25 Pawtucket Avenue); and
- Eddy Chevrolet (45-55 Division Street – Closed).

Four (4) locations where this data indicates that DEM Site Investigation Remediation has been conducted are located near the Site with varying land use restriction statuses. These locations include:

- Tire Pros – 21 Division Street (Environmental Land Use Restriction - ELUR);
- Town Landing (Pawtucket Landing) – Taft Street (No Use Restriction);
- Division Street Hotel, LLC (former Eddy Chevrolet) – 45-55 Division Street (No Use Restriction); and
- Festival Pier – School Street (ELUR).

3.0 Project Description

The purpose of the Project is to redevelop and restore the Seekonk River waterfront to promote economic development, improve public access and passive recreation opportunities, improve water quality, and provide enhanced wildlife habitat. Specifically, the Project aims to create a primary public access pathway and secondary public access trail, install one (1) stormwater basin, install one (1) UIC system, provide interpretive signage, develop public parking, construct a public plaza, and incorporate lighting and seating areas. The proposed walking paths (identified as the Lower Riverwalk and Nature Trail on the plans in Appendix C) will be established within a proposed Urban Coastal Greenway (UCG) for the purpose of public access to and along the Seekonk River. Habitat restoration efforts will include removing invasive species, planting native species, and restoring the existing coastal wetland. Erosion control measures will be implemented downgradient of all proposed work areas to protect coastal features and water quality within the Seekonk River.

Specific work to be performed as part of the Project will consist of the following:

- Installation of erosion and sedimentation control measures;
- Removal of existing invasive and nuisance species using various removal methods;
- Removal of existing debris;
- Demolition and removal of concrete retaining walls and bituminous asphalt;
- Restoration of an existing, degraded coastal wetland;
- Grading of portions of the Site;
- Construction of one (1) stormwater basin;
- Construction of one (1) UIC system;
- Construction of an approximately 2,130 LF of walking paths and boardwalks;
- Planting of native species throughout the Site;
- Construction of the Tidewater East Plaza;
- Re-construction of the existing parking lot at the end of River Street and adjacent to the Tidewater East Plaza;
- Installation of additional amenities including amphitheater, light fixtures, trash receptacles, overlooks, 24 square feet of interpretive signage, and benches;
- Establishment of two (2) future development lots; and
- Stabilization of the Site.

3.1 Walking Paths and Boardwalk

Approximately 2,130 LF of walking paths and boardwalks identified as the Lower Riverwalk and Upper Riverwalk will be constructed to provide public access to the Seekonk River. Both the Lower and Upper Riverwalks will include public amenities including overlook areas, benches, and interpretive signage.

The Lower Riverwalk will include 1,200 LF of asphalt walking path along with 400 LF of boardwalk proposed to span over the coastal wetland. The Nature Trail will include a 470 LF stabilized aggregate path and a 60 LF boardwalk over the proposed stormwater infiltration basin. The proposed boardwalk will span the infiltration basin and provide a connection between the Nature Trail and Lower Riverwalks. A staircase is proposed to be constructed at the southern end of the Nature Trail for access from School Street.

The Lower Riverwalk will be approximately 12-feet wide and will consist of a combination of a bituminous asphalt and timber boardwalk. The asphalt will be 3 inches thick on top of an 4-inch layer of graded ¾-inch crushed stone aggregate, over 6-inch sand layer, over 3-inch layer of pea stone over a 8-inch base course of ¾-inch crushed stone. The Nature Trail will be 5-feet wide and will consist of stabilized aggregate that is 4-inches thick over a 12-inch layer of 3/8 – 1/2-inch crushed stone on top of the existing compacted subgrade or 12-inches of gravel borrow subbase course material. Where space is available, on either side of the Nature Trail, a minimum 2-foot-wide vegetated slopes will transition to existing grade.

The boardwalk portion of the Lower Riverwalk will be positioned approximately 15-feet above the ground at an elevation of 19 feet (NGVD29) and will be approximately 10-feet wide, except in the location of the overlook where the boardwalk will be approximately 14’ 8” wide. Galvanized helical pilings will provide structural support for the boardwalk with additional support from helical anchors. The boardwalk will be constructed using hardwood timber for the decking, rails, pickets, and posts. An overlook area with benches and lighting fixtures is proposed along the boardwalk. Due to the nature of the boardwalk serving as access through a Coastal Bluff and Coastal Wetland, some earth disturbance within protected resource areas will be required to complete the installation.

3.2 Tidewater East Plaza

The Tidewater East Plaza will be constructed over the existing asphalt parking lot adjacent to 21 Division Street. The Plaza will be approximately 29,000-square feet (sf) and include a seating area, overlook, and landscaping including native shade trees. An existing parking lot, at the end of River Street and adjacent to the plaza, will be reconstructed and provide public parking for the area. A pedestrian bridge will be proposed under a separate Assent Application that will start within the plaza and span the length of the Seekonk River to provide pedestrian access between the Tidewater East Plaza, the Tidewater Stadium Site, and the Riverwalk West Urban Coastal Greenway. During this phase of construction only the abutment associated with the bridge is proposed to be constructed within the plaza.

4.0 Mitigation Measures

The Project has been designed to minimize impacts to the Coast, Shoreline Features, buffer zone, wildlife habitat, and sensitive environmental areas to the greatest extent feasible. Mitigation measures will incorporate best available construction practices and design consideration including, installation of erosion controls, implementation of stormwater management, removal of invasive species, plantings of native species, and restoration of the coastal wetland.

The following sections outline the specific mitigation measures that will be implemented throughout work at the Site.

4.1 Erosion and Sedimentation Controls

Use of soil erosion and sedimentation controls will occur throughout the construction phase. The soil erosion and sedimentation control measures will be installed prior to the initiation of construction activities and maintained throughout construction. Compost filter tubes are proposed at the downgradient limit of disturbance and inlet protection (i.e., silt sacks) will be installed in all catch basins within proximity to the Project. The stormwater basin will be utilized as sediment basins throughout the site to provide additional sediment control during earthwork activities. An additional temporary sediment trap is shown on Sheet 17 of the plans in Appendix C. During Coastal Wetland restoration, work turbidity curtains will be installed at the limits of work to ensure excess sediment does not enter the Seekonk River. Once established, these measures will be monitored daily until construction activities are complete.

The compost filter tube barrier will serve as the limits of disturbance for the Project. No alterations, including vegetative clearing or surface disturbance, will occur beyond this line. The limits of clearing, grading, and disturbance will be kept to a minimum within the proposed area of construction. All areas outside of these limits, as depicted on the Project site plans, will remain undisturbed in a natural condition. After significant rainstorms, all sedimentation control measures will be inspected and maintained and/or replaced, as necessary.

4.2 Water Controls and Dewatering

It is not anticipated that dewatering will be required, as construction within low-lying areas subject to high groundwater elevations will only consist of installing helical piles and restoring the Coastal Wetland. Should dewatering be required for a component of the Project, the contractor will be required to submit a dewatering plan to the City and their Engineer for review and approval prior to the commencement of work. The discharge from construction dewatering shall be prohibited from entering any resource areas within the project limits.

4.3 STORMWATER MANAGEMENT

Stormwater runoff generated from proposed conditions at the Site will be mitigated in accordance with the Rhode Island Stormwater Management, Design, and Installation Rules[3]. The Project includes the installation of one (1) stormwater management basin, one (1) underground infiltration chamber (UIC) system, and several stormwater control measures (SCMs) throughout the project area, as depicted on Sheets 21-24 of the plan set.

The following preliminary water quality volumes (WQV), based on 1-inch over the impervious area, have been estimated for the Site;

- Wood Development Site = 12,450 CF
- Pennrose Development Site = 3,064 CF
- Riverwalk / Stormwater Park = 1,954 CF

Total Site WQV = 17,467 CF

The following preliminary water quality volumes (WQV), based on 0.5-inch over the impervious area, have been estimated for outside of the Site;

- Portuguese Social Club Way Area = 3,981 CF
- City of Pawtucket Drainage Area = 18,598 CF

Total Additional WQV = 22,579 CF

The City is including the Portuguese Social Club Way Area in the WQV calculations because the existing drainage line conveying stormwater from this area currently crosses the Wood Development Site and will need to be re-routed around that site to a new discharge within the proposed Site. A portion of the impervious area, approximately 0.91 AC, from the Wood Development Site will be routed to the existing drainage system within Division Street. The 0.91 AC of impervious area is a decrease from the 2.20 AC of impervious area that was originally going there from the Portuguese Social Club Way area. The City will provide pre-treatment of the stormwater with stormwater control measures, such as a Contech Unit or other approved technologies for treating stormwater.

The City is also including the City of Pawtucket Drainage Area in the calculations due to space available and project goals for the proposed Site, specifically within the new Stormwater Park. The City of Pawtucket Drainage Area includes runoff from a portion of the upland residential neighborhood that is collected through several inlets and ultimately discharges to an existing 20" outfall near Festival Pier via an existing drainage trunkline in School Street. By installing a diversion structure in this existing trunkline on School Street, low flows from this area may be collected and infiltrated in the new Stormwater Park that are currently not treated under existing conditions.

The City is proposing to meet the WQV by combining and treating low flow discharge from the Pennrose site and by diverting and treating stormwater from an existing 13.5-acre upland watershed (City of Pawtucket Drainage Area) within the new stormwater infiltration basin on the southern end of the new Stormwater Park. The stormwater basin will provide WQV for ½-inch of treatment over the existing

[3] Rhode Island Stormwater Management, Design, and Installation Rules 250-RICR-150-10-8 Section 8.1 to 8.40

impervious area of the City of Pawtucket Drainage Area and 1-inch of treatment over the proposed impervious area of the Pennrose Development Site.

Design of the stormwater infiltration basin has estimated to provide 27,442 CF of water quality treatment, which alone will meet or exceed the Site water quality volume requirements. The proposed stormwater basin will function as an infiltration basin with rates assigned based on field investigations completed in June 2025 as described in detail in the section below. The basin will be planted with a variety of woody and herbaceous native plantings to improve the quality of onsite habitat and reduce invasive species pressure.

On the northern end of the new Stormwater Park, an underground infiltration chamber (UIC) system is proposed to treat WQV from the Portuguese Social Club Way Area in addition to the Wood Development Site. As previously mentioned, a new discharge will be created from the diversion of the existing drainage line around the Wood Development Site. The new discharge is required because it is not feasible, due to lower elevation site constraints, to route the existing drain line and reconnect it to the existing drainage system within Division Street. The new discharge will receive stormwater from the Wood Development Site, the Portuguese Social Club Way watershed, the plaza area and associated parking lot. The City will provide pre-treatment of the stormwater with stormwater control measures, such as a Contech Unit or other approved technologies for treating drainage areas contributing to the new discharge. Low flows will be diverted upstream of the new discharge to send stormwater to the proposed UIC system.

Design of the UIC system has estimated to provide 16,439 CF of water quality treatment. The UIC system will infiltrate stormwater with rates assigned based on field investigations completed in June 2025 as described in detail in the section below.

In summary, the stormwater infiltration basin will provide 27,442 CF of WQV and treats the City of Pawtucket Drainage Area and the Pennrose Development; the UIC system will provide 16,439 WQV and treats the Portuguese Social Club Way Area and the Wood Development. The total WQV provided by the Site is 43,881 CF, exceeding the required WQV treatment for the new impervious area between the Pennrose Development, the Wood Development, and the Stormwater Park, which is 17,467 CF. To provide ½-inch treatment for both the City of Pawtucket Drainage Area and the Portuguese Social Club Way Area in addition to the Site, the total is 40,046 CF. Therefore, there is sufficient capacity for water quality volume treatment for both additional sites between the proposed stormwater infiltration basin and proposed IUC system.

4.4 Infiltration Testing

On June 2nd and 3rd, 2025 Thielsch Engineering, Inc. performed in-situ infiltration testing at five (5) locations between School Street and the Seekonk River at the Tidewater Landing Phase 1B Site. The goal of the testing was to determine in-situ infiltration rates and conduct soil characterization to assess groundwater conditions in the vicinity of the proposed stormwater infiltration practices. Infiltration testing results and test pit logs are included in Appendix F.

4.5 Invasive Species Control and Native Plantings

Currently, the Site is predominantly vegetated by non-native and invasive plant species intermixed with native and non-native species. The presence of invasive species is degrading the local ecosystem by reducing biodiversity and high-functioning wildlife habitat. To address this, a Coastal Buffer Zone Vegetation Management Plan has be developed by a Certified Invasive Manager (IM) for implementation

during the construction phase of the Project (Appendix E). Invasive species will be managed in phases, with 50% of the Site proposed from management in Invasive Plant Management Area A-1 (IPM A-1) and Invasive Plant Management Area B (IPM Area B). Species including, Japanese knotweed (*Fallopia japonica*), common reed (*Phragmites australis*), Asiatic bittersweet (*Celastrus orbiculatus*), multiflora rose (*Rosa multiflora*), black locust (*Robinia pseudoacacia*), Sycamore maple (*Acer pseudoplatanus*), Norway maple (*Acer platanoides*), white mulberry (*Morus alba*), autumn olive (*Elaeagnus umbellate*), tree of heaven (*Ailanthus altissima*), bush honeysuckle (*Lonicera* spp.), european buckthorn (*Rhamnus cathartica*), privet (*Ligustrum* spp.), winged euonymus (*Euonymus alatus*), garlic mustard (*Alliaria petiolata*), and mugwort (*Artemisia vulgaris*) are present at the Site. Invasive species that exist in locations where grading is proposed will be removed and disposed of at an appropriate facility to ensure that there is no dispersal of viable seeds or rhizomes. Management of invasive species outside of areas proposed for grading will be managed using both mechanical and chemical treatment. Although a large percentage of the canopy at the Site outside of where site improvements are proposed consist of invasive tree species, all invasive trees will not be removed to ensure canopy cover is maintained. Trees will be removed selectively and will be marked in the field prior to management. Post-construction monitoring will be conducted for three (3) growing seasons by a IM to document the efficacy of these efforts and recommend any required plan modifications. After three (3) full growing season and approval from CRMC additional invasive species removal will be proposed for management in Invasive Plant Management Area-2 and Area-3 (IPM A-2 and A-3) to allow for 100% restoration of the buffer zone. Other vegetation management will include removal of hazard trees and pruning and limbing, as well as selective thinning of trees and undergrowth vegetation near where Site improvements are proposed. Management will ensure members of the public are safe and newly constructed Site improvements are not damaged by dead/dying trees. Please see Appendix E – Coastal Buffer Zone Vegetation Management Plan for management techniques and compliance with CRMC's Buffer Zone/Invasive Management Guidance.

The Project was designed to maintain existing native vegetation, including trees and shrubs, to the extent feasible. Existing trees have been GPS located and mapped throughout the Site (See Plan Sheet 9 through 11). This was done to ensure the Project was designed to avoid impact to native species. During construction vegetation within the vicinity to work that is proposed to be maintained will be marked in the field with flagging and/or protected with snow fencing. Additionally, to ensure the Site is vegetated with a cover of species that are native to Rhode Island's coastline native plantings are proposed throughout. Replanting using exclusively native species is proposed to increase wildlife habitat and biodiversity. Plantings will include native trees, shrubs, and herbaceous species, as well as the use of the see mixes as depicted on Plan Sheet 48 for stabilization of the Site. Further details on planting efforts are depicted on the plans in Appendix C.

4.6 Coastal Wetland Restoration

A Coastal Wetland is present within the southeastern portion of the Project. As described in the Wetland Delineation Letter of Findings in Appendix B, the Coastal Wetland delineated with flagging in the field consists of a tidal channel vegetated with common reed and the low-lying area adjacent to this flagged wetland is underlain by hydric soils but is dominated by a monoculture of Japanese knotweed. It is likely that the area dominated by Japanese knotweed was historically a Coastal Wetland prior to anthropogenic impacts at the Site.

The Project proposes to improve the quality and expand the size of the wetland and assist in salt marsh migration by removing the invasive species, increasing the size of the wetland by further lowering the grade of the surrounding area, grading, and revegetating the wetland with native species. Invasive species will be removed by cutting the top growth and excavating all roots and rhizomes. The area will be

monitored to ensure all root systems were removed and any resprouting will be further excavated/hand-removed. Once invasive species are removed, the wetland will be increased from the existing 1,200-sf to 10,915-sf by excavating the surrounding area to grades between 2-5 feet. Grading will be done in a manner that will ensure ponding does not occur and the entire area is exposed to tidal inundation. If necessary, hydric soil amendment consisting of a 1:1 blend of organic compost and clean topsoil will be placed as a planting medium. A native wetland seed mix will be broadcast over the area and native species will be planted per the details on Plan Sheet 48 and Appendix E – Coastal Buffer Zone Vegetation Management Plan. Post-construction monitoring will be conducted for three (3) growing season by a Qualified Professional to document the success of the restoration area and identify any required corrective actions. Restoration of this area is further described in Appendix E – Coastal Buffer Zone Vegetation Management Plan where the area is referred to as Invasive Plant Management Area B (IPM Area B).

5.0 Regulatory Compliance – MB SAMP / UCG (650-RICR-20-00-5)

The following sections outline compliance with the MB SAMP / UCG Development Standards as required in the Report of Finding – Preliminary Determination issued by CRMC. The Project, which is a public/private partnership associated with the nearby Tidewater Stadium Site, is anticipated to require relief from the setback and Coastal Buffer requirements from Sections 1.1.9 and 1.1.11 of the Red Book and therefore can be subject to the provisions of Section 5.5 of the MB SAMP.

5.1 Metro Bay Region – Authority and Purpose – Section 5.1

As outlined in this section of the regulations, the Project complies with the requirements of The Federal Coastal Zone Management Act. This Project proposed to redevelop this urban waterfront with consideration to economic developments that is compatible with the ecological, cultural, historic, and aesthetic values of the coastal zone. This Project is Phase 1B of a larger project associated with public and private improvements of this coastal area. Economic improvements in the area have already been facilitated with the construction of the Tidewater Stadium which will connect to this Project through construction of a pedestrian bridge over the Seekonk Rive that will be proposed under a separate application. Additional development areas consisting of commercial properties will also be proposed within this area under separate applications. This phase of the Project specifically aims to improve the ecological, aesthetic, and cultural value of the coastal zone through restoration of the Site and creation of public amenities.

5.2 Metro Bay Region - Policies – Section 5.3

5.2.1 Debris Subject to Removal – Section 5.3(n)

As discussed in the attached Operations & Management plan in Appendix J the existing and proposed infrastructure at the Site will either be retained, removed, or reconstructed. The condition of all existing structural elements will be assessed, and if deemed to be deficient or compromised the structures shall be repaired or replaced as soon as possible. The retaining wall located within the northern side of the Site associated with the proposed Tidewater East Plaza is proposed to be partially removed and reconstructed. Other retaining walls at the Site are generally in good condition and may require minor repairs throughout the construction phase. Additionally, solid waste that is present throughout the Site will be removed when encountered during initial restoration efforts and throughout the construction phase. All waste will be collected and disposed of at an appropriate facility.

5.2.2 *Fitness of purpose – Section 5.3(o)*

The pedestrian bridge previously proposed within the Preliminary Determination will be proposed under a separate application. Only one abutment wall associated with the proposed pedestrian bridge will be constructed during this phase of work because it is integral to supporting the plaza and pathway. No bridges are proposed for construction within a Type 4, 5, or 6 waters, accordingly, this standard no longer applies.

5.3 Urban coastal Greenway Policies – Section 5.4

As requested within the Report of Findings issued by CRMC stormwater, coastal resource protection/restoration, and public access is discussed throughout the following sections.

5.3.1 *High Priority Conservation and restoration areas – Section 5.4(g)*

Full delineation of HPCA & HPRA along with coastal features and existing wetland habitat boundaries are provided on the Project plans in Appendix C.

5.3.2 *Building shading/visual elements – Section 5.4(i/j)*

The Report of Findings requested this section be addressed in considerations to the buildings shading/visual elements specifically looking at current vs proposed elevations, viewshed, and degree of area imperviousness.

Elevations (Current vs Proposed) – The proposed changes in elevation will not increase shading patterns on shoreline resources or the UCG. Shading will be reduced by removing existing trees and grading portions of the Site. Removal of trees and invasive species will also allow for opportunities for more diverse understory vegetation improving the visual quality of the Site. Grading is proposed along the natural landform adjacent to School Street and within various locations throughout the Site to allow for proposed Site elements. Existing slope, specifically along School Street and within the Site are highly eroded and overgrown with dense invasive species. The proposed grading will restore a more stable landform condition and allow for better establishment of native understory vegetation. Reducing the vegetative cover of invasive species and increasing native species with deep root systems will also provide better stabilization to the existing landforms on the Site and reduce chances of erosion. These changes will improve slope stability and public access without increasing shading and improving the visual elements of the Site.

Viewshed – The Project will improve the Site's viewshed by removing dense invasive vegetation and anthropogenic debris that currently obstructs coastal views. Public access is proposed adjacent to the Seekonk River where current conditions consist of dense invasive vegetation that reduce the quality of the viewshed to the coastal zone. Removal of invasive species and replanting with native species will open sightlines and enhance the views of the coastline. The Project does not propose to construct structures or features that would negatively impact the Site's visual characteristics.

Impervious Areas - Impervious surfaces are proposed for the creation of walking paths that will be required to be impervious to fulfil ADA requirements. These surfaces will total approximately 21% of the Site. The addition of these paths will not create new shading impacts or diminish visual quality, as they are low-profile, ground-level features. The proposed boardwalk over the Coastal Wetland will cause minimal shading to the wetland due to it being proposed approximately 15-feet off the ground. Accordingly, the impervious area is limited in extent and does not alter the Site's overall visual appearance or increase shading at the Site.

5.4 Urban Coastal Greenway Development Standards for the Metro Bay Region– Section 5.5.1

The UCG is depicted on the plans and is proposed throughout a majority of the Site encompassing 362,656 sf (8.32-acres).

5.4.1 Minimum 15% Vegetation Requirements – Section 5.5.1.A.3(a)

The Project will meet the requirement that 15% of the surface area of the entire development is vegetated. Existing vegetation will be retained to the extent feasible and additional vegetation will be planted throughout the Site. The current Site is predominantly vegetated by invasive species as discussed in Section 4.5. The Project aims to reduce the dominance of invasive species within the landscape and provide restoration through native plantings. A planting plan has been developed for the Site that includes planting of trees, shrubs, and herbaceous species designed under the guidance of a Landscape Architect registered in Rhode Island. The entire area of the Site excluding the walking paths, proposed parking/development areas, and proposed stairway are intended to be fully vegetated. CRMC's Coastal Buffer Zone Planting Guide was consulted to determine specific species to be planted throughout the Site.

As depicted on Sheet 6 of the provided plans, all proposed lots will consist of over 15% vegetated areas. The following is a summary of the previous/vegetated cover by lot:

Lot	Total Area (SF)	% Impervious	Impervious Area (SF)	% Pervious	Pervious Area (SF)
1	245,314	21	51516	79	193798
2	161,708	78	126132	22	35576
3	66,267	57	37772	43	28495
4	206,738	43	88897	57	117841

5.4.2 Stormwater Management – Section 5.5.1.A.3(b)

The Project will meet the stormwater management requirements set forth in Section 1.3.1(f) of the SAMP and the Rhode Island Stormwater Design and Installation Standards Manual (250-RICR-150-10-8). An infiltration basin and UIC system are proposed to treat the required water quality volume for the Site and more. The proposed infiltration practices will be able to sufficiently treat low flows from the Portuguese Social Club Way Area and the City of Pawtucket Drainage Area in addition to the Site, both of which currently discharge directly to the Seekonk River with no treatment or pretreatment. Under proposed conditions, pretreatment will be provided upstream of both infiltration practices through proprietary units and an adequately sized sediment forebay.

The Portuguese Social Club Way Area and City of Pawtucket Drainage Area do not qualify as a Land Use with Higher Potential Pollutant Loading (LUHPPL) and are comprised of commercial businesses (medical building and social club) and mostly residential area, respectively. The location of the infiltration remains within the new Stormwater Park and the proposed vegetation is detailed on Sheet 24 of the Project Plans.

The stormwater infiltration basin is sized to safely convey the 100-Year Storm event. During heavy rainfall events, peak flows will exit the basin though the overflow grate set approximately one foot below the top of the proposed basin. This overflow grate will outlet to a new outfall to the Seekonk River. All flows in excess of the volume that is exfiltrated by the basin is to discharge to the Seekonk River through the

proposed outfall on the southern portion of the Site nearest Festival Pier. Peak flows from the stormwater infiltration basin are not intended to impact the restored coastal wetland.

Similarly, the underground infiltration chamber (UIC) system is sized to safely convey the 100-Year Storm event. During heavy rainfall events, peak flows will bypass the system via a diversion manhole upstream of the system that will allow direct discharge to the Seekonk River. Additionally, a series of overflow outlet pipes are the top of the chamber units will allow for overflow to safely exit the BMP before inundating the top stone layer. These overflow outlet pipes will also discharge directly to the Seekonk River through a new outfall. These outfalls are to be located north of the restored coastal wetland and are not intended to impact the restored coastal wetland.

A complete set of stormwater calculations and documentation of compliance with Design and Installation Standards is provided in Appendix G.

5.4.3 Public Access – Section 5.5.1.A.3.(c)

Public access is proposed as part of the Project throughout the entire proposed UCG. The Project proposes primary (Lower Riverwalk) public access and secondary (Nature Trail) access paths with multiple overlook areas along the Seekonk River. As advised within previous CRMC Report of Findings, the primary path will comply with ADA standards, and the Project will provide arterial pathways, emergency access, and public parking spaces as depicted on the plans in Appendix C. Stormwater requirements have been provided for the proposed impervious primary path as detailed within Section 4.3. Runoff from these surfaces will be directed to the onsite SCMs in accordance with the Urban Coastal Greenway Design Manual.

5.4.4 Construction Setback – Section 5.5.1.A.3(d)

The required 25- foot construction setback cannot be established along the entire length of the proposed UCG within the Development Zone. The Applicant is requesting a variance to reduce the construction setback to a minimum of 0-feet in specific locations and variable lengths at other specific locations. Reduced construction setbacks are required to provide the largest UCG possible. The variance locations are depicted on the UCG Master Plan on Sheet 5 -of the plans.

5.4.5 Project Illumination – Section 5.5.1.A.3E

In accordance with this section, exterior lighting fixtures for the Project will incorporate shielding and glare control devices to shield surrounding areas from excessive light trespass and glare. Relevant lighting details are provided on the final construction plans on Sheet 43.

5.5 Urban Coastal Greenway Zones – Section 5.5.1(b)

The Site is located within two specific zones identified in the Metro Bay Special Area Management Plan (MB SAMP). One area is identified as an Area of Particular Concern (APC) Zone and the other is identified as a Development Zone (DZ). This project is eligible to be reviewed by CRMC under the requirements of the MB SAMP by incorporating an Unban Coastal Greenway (UCG) in accordance with the requirements of each zone. The Tidewater Phase 1B Project will seek approval within each zone as follows:

- Area of Particular Concern Zone requires a 150’ Buffer and 25’ Construction Setback. The applicant is requesting approval under Option 2: Variance Request to Reduce Buffer Width. The request is for a 50% variance to reduce the buffer to 75’ and reduce Construction Setbacks in portions of the APC to 0’.
- Development Zone requires a 100’ Buffer and 25’ Construction Setback. The applicant is requesting approval under Option 3: Compact UCG Width of 50’ and a 25’ Construction Setback.

5.6 General Standards for Urban Coastal Greenways – Section 5.5.1(C)

The following will be adhered to in accordance with Section 5.5.1.C.1. through 8. and CRMC's PD comments:

1. The UCG shall begin at the inland edge of the coastal feature. The coastal feature has been defined as the top of the man-made seawall, coastal bluff and/or inland edge of the contiguous freshwater wetland. The coastal feature, the applicable variable width UCG areas, and the construction setbacks are clearly delineated on all Site plans.
2. The averaging method will be used within the applicable UCG areas for compensatory UCG width reductions. The proposed UCG will meet or exceed the minimum applicable area requirements, see table below.

   Standard UCG Requirements

Zone	Buffer (FT)	Area (SF)
APC	150	60,612
Development	100	40,040
Total		100,652

   Proposed UCG Requirements

Zone	Buffer (FT)	Area (SF)
APC	variable	249,444
Development	variable	113,212
Total		362,656

3. The UCG easement boundaries, construction setbacks, public access paths, and other amenities are depicted on the project plans.
4. Appropriate signage that has been approved by the RICRMC and the municipality will be installed, and the inland limits of the UCG will be marked onsite by permanent markers.
5. Signage will be included to inform visitors where access is allowed. Three (3) access points will be provided to the public for access to the UCG. The Project will also include shrubbery and low-level plantings within 10 feet of the proposed paths and vegetation will be dispersed so as to prevent "isolated pockets". Shoreline observation opportunities will be enhanced by the installation of the UCG adjacent to and over the coastal features with ADA-accessible viewing platforms. Emergency access to public spaces and maintenance access for stormwater treatment measures are provided.
6. Emergency access has been coordinated with the City of Pawtucket and is provided. The Pawtucket Fire Department has requested a City of Pawtucket emergency vehicle be housed within the parking garage of the Wood Development (Lot 2) building to support an emergency along the riverwalk and or pedestrian bridge.
7. No encroachment except for what is listed in Section 5.5.1.C(d) will be allowed within the UCG.
8. The UCG will be dedicated to public use through the granting of a Conservation Easement to the CRMC per Section 5.5.1.C(8).

5.7 Vegetation Standards for all Urban Coastal Greenways – Section 5.5.1(D)

The following will be adhered to in accordance with Section 5.5.1.D.1 through 5. of the MB SAMP and CRMC's PD comments:

1. The UCG is proposed to be vegetated except for the two public access paths and the public plaza. Landscaping, including a mixture of exclusively native vegetation (groundcover, shrubs, trees) is proposed as a part of this Project. Stormwater from the public access paths will be directed into the proposed stormwater infiltration basin, which is proposed to be vegetated with native species.
2. According to the National Register of Historic Places Locations, the Site is located adjacent to a National Register of Historic Places Point – The Division Street Bridge and is partially located within a National Register of Historic Places Polygon - South Street Historic District. According to RiGIS data a Historic Cemetery – Old St. Mary's is located approximately 850 feet from the Site, two (2) Historic Sites – Trinity Church and Joseph Spaulding HS are located approximately 600 feet from the Site, and a Historic Candidate Site – Gilbert Carpenter House is located approximately 400 feet from the Site. The Project proposes no impact to any adjacent Historic Resource.
3. Vegetation will be managed in perpetuity within the UCG to support continued public access. Restoration of the Site, including within the proposed UCG, will occur through invasive species removal and planting of native vegetation per the CRMC Rhode Island Coastal Planting Guide as described in management plan in Appendix E. Existing desirable vegetation will be preserved to the maximum extent practicable (Section 4.5), and species have been chosen for their hardiness, high wildlife value and aesthetic value (Appendix C – Project Plans).
4. An Urban Coastal Greenway Management Plan is attached as Appendix E – Coastal Buffer Zone Management Plan and documents proposed management of the UCG for any proposed future work within the UCG. The management plan has been designed to improve the wildlife habitat and general biodiversity of the Site.
5. The Project preserves non-invasive vegetation that exists at the Site to the maximum extent practicable based on a design that is being prepared under the guidance of a Landscape Architect registered in the state of Rhode Island. Details regarding protection of vegetation is outlined in Section 4.5 of this narrative.

5.8 Public Access Standards for all Urban Coastal Greenways – Section 5.5.1(E)

In accordance with Section 5.5.1.E.1.a. through j. of the MB SAMP and CRMC's previous Report of Findings, the following is proposed:

a. Public access within the UCG has been provided as a part of this Project. Public access is provided via the two proposed pathways that provide a continuous connection between Festival Pier and River Street.

b. The lower 12' primary pathway and the upper 12' public trail with connection to the amphitheater have been designed to meet ADA standards.

c. The 12' primary public access within the UCG has been designed to accommodate both pedestrians and bicycles and will provide connections to existing municipal infrastructure at Festival Pier and River Street.

d. The boardwalk and pathways within the proposed UCG will not be pervious; therefore runoff from these surfaces will controlled on site and collected by the closed drainage system or conveyed non-erosively through vegetated drainage swales.

e. A secondary access trail has been included that runs parallel to the primary access path and is approximately 5-feet-wide. The trail will also have connection points to the lower path. The secondary public access path is proposed to connect to School Street via a staircase which will allow for connection to the public sidewalk.

f. The proposed UCG surfaces are designed to support the load and width of emergency vehicles.

g. Pedestrian access to a secondary public access will not be provided every 500 feet, the City is requesting this requirement be waived provided the City provides ten (10) percent more public parking. The linear shoreline is estimated to be approximately 1,900 linear feet, using the closing lines provided on the property survey. The coastline is irregular, so a straight line was used to approximate the shoreline distance.

h. Public parking spaces are provided at Festival Pier and the lot adjacent to the plaza. In accordance with the design requirements a minimum of two (2) public parking spaces will be provided at each access point along with an additional space per 100 linear feet of shoreline. Therefore, 1,900 linear feet divided by 100 linear feet equates to 19 parking spaces plus the additional 10% or 2 additional spaces from paragraph g. above for a total of 25 public parking spaces. The proposed UCG parking plan allows for 44 public parking spaces.

i. The Project is not anticipated to require relief from public access requirements.

j. The Project, by inclusion of the UCG included the existing Festival Pier, which provides access to the Seekonk River via a boat ramp, a kayak launch, additional public pathways, recreation and open space, and provides 39 public parking and 16 public boat trailer parking . It is anticipated that this will satisfy CRMC's requirement for promoting passive recreation within the waterway.

5.9 Stormwater Standards for all Urban Coastal Greenways – Section 5.5.1(f)

Stormwater runoff generated from proposed conditions at the Site will be mitigated in accordance with the Urban Coastal Greenway Desing Manual and the Rhode Island Stormwater Design and Installation Standards Manual using Low Impact Development (LID) techniques. A stormwater infiltration basin is proposed that will be vegetated by native species and will provide water quality treatment of the stormwater entering the basin. An underground infiltration chamber (UIC) system is also proposed that will provide water quality treatment of stormwater routed to the system. Through both proposed stormwater infiltration practices, off-site stormwater that is currently untreated is proposed to be treated and further benefit the Seekonk River. Peak flow rates and volumes are to be mitigated through the proposed practices. Plantings are proposed throughout the Site that will include the installation of trees that will promote evapotranspiration, restore urban forest, provide scenic relief and vegetative screening.

The City is asking for relief to allow the proposed stormwater infiltration basin to be located within the UCG due to the various site constraints including a narrow width of the site, excessive grade changes, and proximity to an existing utility easement prevent the basin from being located outside of the UCG.

5.10 Structural Shoreline Protection Standards for all Urban Coastal Greenways – Section 5.5.1(g)

The Tidewater Phase 1B project does not propose any structural shoreline protections.

5.11 Prohibitions – Section 5.5.1(H)

Upon completion of all phases of the Project, the following activities and uses shall be prohibited within the UCG:

1. Petrochemical storage;
2. Storage of other hazardous materials;
3. Parking or automobile storage within the UCG;
4. Application of chemicals (e.g., pesticides, fertilizers, etc.) that have not been approved by the RICRMC;
5. Storage or stockpiling of mulch, compost, or other organic materials;
6. Storage or stockpiling of construction materials;
7. Fueling and servicing of equipment and other motorized vehicles; and
8. Recycling of construction materials.

5.12 Residential Zone – Section 5.6

The Project does not fall within the Residential Zone.

5.13 Area of Particular Concern Zone – Section 5.7

Portions of the Project are located within Areas of Particular Concern Zones 2 and 3. Currently, existing habitat conditions do not have high value in regard to ecological, recreational, and scenic value due to a high percentage of invasive vegetation and the presence of anthropogenic debris (see Appendix I – Vegetation and Wildlife Habitat Assessment). As requested in the Report of Findings, additional information has been provided describing existing habitat conditions within the APC and detailing proposed measures for habitat protection and restoration. Invasive vegetation throughout the Site is proposed to be removed and replaced with native plantings, which will improve the currently degraded habitat and enhance both recreational and scenic quality. These measures are described in Section 4.5 of this narrative and in the Buffer Zone Vegetation Management Plan included in Appendix E. The degraded coastal wetland located within the APC is proposed to be restored to improve tidal inundation and establish native vegetation cover, as described in Section 4.6 of this narrative. Existing trees have been identified using GPS technology and mapped across the Site (see Plan Sheets 9 through 11) to ensure that Project design avoids impacts to native species. During construction, vegetation proposed for preservation will be clearly marked in the field using flagging and/or protected with snow fencing.

A Buffer Zone Vegetation Management Plan, prepared by a Rhode Island licensed landscape architect and developed in accordance with CRMC's Invasive Species Management Guidance, has been submitted as part of this application (Appendix E). Consistent with the Report of Findings, the Project proposes the restoration and long-term maintenance of a natural vegetated coastal buffer.

The Project will adhere to UCG Sections 5.7(2) and is requesting a Variance for Buffer Zone width. In accordance with this section, the Project is being proposed under Option 2: Variance Request to Reduce Buffer Widith. The total UCG within the APC Zone is proposed to be approximately 250,064 sf (5.74 acres). With the proposed UCG of 250,064 sf the total square footage is greater than what a 150-foot UCG would provide, which would be approximately 117,481 sf (2.70 acres) as depicted in Figure 7. Within the UCG only grading, stormwater management, public access paths, and management of the buffer zone are proposed. As requested in the Report of Findings, an analysis of the Option 2 variance has been included in Section 5.16 of this narrative as well as a Special Exception in accordance with §1.1.8 of the Red Book. The Special Exception is being requested to allow limited segments of the proposed improvements to

occur within the 75' Buffer. As detailed in Section 5.3 public access and stormwater management are proposed.

5.14 Inner Harbor and River Zone – Section 5.8

The Project site does not fall within the Inner Harbor and River Zone.

5.15 Development Zone – Section 5.9

A portion of the Project is located within a Development Zone. Accordingly, the Project is requesting a variance from the setbacks within this area to adhere to Option 3: Compact UCG Width (50 feet) with additional compensation for the reduced UCG width. Although a 50-foot UCG will be used, additional UCG area is proposed to allow for the same area that a 100-foot UCG would provide. The total UCG within the Development Zone is 114,617 sf (2.63 acres) as depicted on Sheets 4 of the provided plans. With the proposed UCG of 114,617 sf the total square footage is greater than what a 100-foot UCG would provide, which would be approximately 76,828 sf (1.76 acres) as depicted in Figure 7. Additional compensation in accordance with Section 5.13 including, removal of invasive species and planting of native species throughout the Site as described in Section 4.5 of this narrative and the creation of amenities such as, benches, look out points, and interpretive signage are also provided.

5.16 Mitigation Requirement in Lieu of Public Access – Section 5.10

Public access and mitigation consisting of habitat improvements (Sections 3.1 and 4.4) have been provided as a part of the Project.

5.17 Variance Requests – Section 5.11

Work within the APC Zone is requesting to be permitted using Option 2: Variance Request to Reduce Buffer Width. A Special Exception is also being requested to allow for a reduced buffer widths to allow for segments of the proposed work including 150 LF of the boardwalk, 75 LF of access path, 200 LF of nature trail, and site grading associated with the improvements including the future development on Lot 3, as depicted on Sheet 5. As the Project encompasses multiple parcels that total an area greater than 80,000 sf, a 150-foot Buffer Zone from Coastal Features would be required within this APC Zone, as depicted in Figure 7. Strict adherence to the requirements would render the existing APC Zone within Plat 23 Lot 673 approximately 106,030 sf (2.43 acres) essentially undevelopable. In accordance with the MB SAMP, the Project Proponent is seeking approval under Option 2: Variance Request with a 50% reduction from 150-feet to 75-feet for the Buffer Zone as the only feasible option to allow for a public assess path to be constructed within the APC Zone from Festival Pier northerly to the abutting Development Zone. As documented in prior sections of this application, the site has several constraints including the narrow lot width, irregular coastal feature, steep topography, and existing utility easements that limit or prohibit what can be developed within the zone. Therefore, compliance to variance standards is anticipated to be provided as follows:

1. The proposed alteration will conform to applicable goals and policies in Section 1.2 and 1.3 of the Coastal Resources Management Program – Red Book.
2. The alteration will not result in significant adverse environmental impacts. Environmental impacts will be mitigated and minimized to the maximum extent feasible. The Project will improve the conditions of the ecosystem of the Site by restoring the Coastal Wetland, improving water quality discharging to the Seekonk River, conducting invasive species removal, and planting native species as described in Section 4.5 and 4.6 of this narrative.

3. To accomplish the goals of the Project and maximize the usable space at the Site the applicable standards will not be met. The Site is constrained by existing infrastructure on the northern, eastern, and southern sides of the Site and constrained by Coastal areas on the western side of the Site. This limits the space that will be able to be used for proposed future Lot 3 Development that will be located outside of the 75-foot Buffer Zone, but within the 150-foot Buffer Zone. With these factors in mind the Project has been designed to comply with the applicable standards for the APC Zone to the maximum extent feasible. Improvement of the ecosystem and habitat, creation of walking paths for public use, grading, vegetation removal, and stormwater management are the only activities proposed within the 75-foot Buffer Zone within the APC Zone.
4. The modification requested represents the minimum variance to the applicable Buffer Zone standard to allow a reasonable alteration of the Site and to allow for public access and planning of future developments. If the variance is not granted public access through the APC Zone cannot be provided.
5. The requested variance is not due to any prior actions of predecessors in title.
6. Due to Site constraints, complying with the standards will cause the applicant an undue hardship as a significant portion of the Site will not be able to be developed for public access and the required water quality improvements for existing City infrastructure as well as the future development that is planned. This development is proposed to allow economic stimulation and to provide both public and private infrastructure at the Site. If not permitted under the 75-foot Buffer Zone the future development, along with public access and water quality improvements will not be able to be constructed within the Site.

5.18 Brownfield Redevelopment with the Metro Bay Region – Section 5.12

The Project site does not fall within Brownfield Redevelopment Zone.

5.19 Compensation Options for Urban Coastal Greenway Requirements – Section 5.13

Compensation including restoration of an onsite degraded wetland[5] as described in Section 4.6 and increase in amenities along the public pathway[6] including benches, lookout points, and interpretive signage as described in Section 3.1 will be provided to allow a variable width UCG that still meets the necessary area requirements. Additionally, all standards for the UCG including shoreline features, vegetation targets, public access, and minimum widths and requirements set forth for Development Zones including 15% vegetation requirements and stormwater management as described above are provided for this Project.

Within the Development Zone the proposed improvements result in approximately 11,220 sf of Buffer Impact. The required compensation is at a ratio of 2:1 and requires a minimum of 22,440 sf of compensation. The proposed UCG provides approximately 34,880 sf of compensation consisting of the following:

- Access Pathway
- Pedestrian Overlook
- Plaza

[5] Metro Bay SAMP Section 5.13(B)(2)(a)2
[6] Metro Bay SAMP Section 5.13(B)(2)(a)3

- Amphitheater
- The compensation is depicted on Sheet 4 of the plan set.

Within the Area of Particular Concern Zone, the proposed improvements will result in approximately 15,340 sf of Buffer Impact. The required compensation is at a ratio of 2:1 and requires a minimum of 30,680 sf of new buffer. The proposed UCG provides new buffer area with Lot 1 and Lot 4 totaling approximately 37,075 sf as depicted on Sheet 4 of the plan set.

5.20 Urban Coastal Greenway Management and Maintenance Requirements – Section 5.14

The UCG will be maintained by the City of Pawtucket in accordance with the CRMC Assent if granted. The CRMC will be the beneficiary of the UCG easements, and all easements will be placed in the land evidence records of the municipality of jurisdiction. A UCG Management Plan is attached as Appendix J and Appendix E. No encroachments will be allowed within the UCG at any time.

5.21 Maintenance and Monitoring of Innovation Stormwater Technologies – Section 5.15

No proprietary stormwater treatment units are proposed as part of the Project within the UCG.

6.0 Regulatory Compliance – Redbook (650-RICR-20-00-01)

The following sections outline compliance with the CRMC Redbook (650-RICR-20-00-01). As outlined in the CRMC PD comments, the following policies of the Red Book are applicable to the project and proposed activities.

6.1 Authorities and Purpose, Definitions and Procedures – Section 1.1

6.1.1 Variances – Section 1.1.7

A variance from the required 25-foot construction setback is proposed within portions of the Development Zone. The Project proposes the largest UCG feasible, which results in the inability to meet the full 25-foot construction setback along approximately 25% of the Development Zone. The six (6) criteria required for a variance applies as follows:

1. Although a 25-foot construction setback is not provided along the entire Development Zone, the Project conforms to the applicable goals and policies of the Coastal Resources Management Program. The Project is designed to enhance natural resources by restoring the currently degraded buffer zone and Coastal Wetland, increase public access through a network of public access paths to the coast, improve water quality through the implementation of stormwater management practices where none currently exist, and support sustainable economic value through future development. The Project cannot fully comply with the 25-foot construction setback in portions of the Development Zone because it is designed to provide the largest UCG feasible for habitat protection and public use.
2. The Project as a whole is intended to improve the quality of the environment at the Site. Future development areas requiring a reduced construction setback have been incorporated into the Project's overall design, including stormwater management and habitat mitigation measures. Providing the largest UCG feasible will preserve and enhance habitat while offering opportunities for public enjoyment of the coastal environment.

3. Due to the creation of the largest UCG feasible, the 25-foot construction setback cannot be achieved in portions of the Development Zone. Granting the variance will allow nearly the entire Site to be designated as UCG, facilitating restoration of existing habitat and providing meaningful public access to a restored coastal landscape.
4. Approval of the variance will allow for the preservation of the UCG while supporting future development that contribute to economic stimulation. The Project balances conservation objectives with private development.
5. The variance request is not due to any prior action of the applicant or the applicant's predecessors.
6. As the Project proposes nearly the entire Site be designated as UCG and future development is intended to directly abut the UCG, requiring the full 25-foot construction setback along the entire Development Zone would result in undue hardship. Compliance would require reducing the UCG area, preventing the Project from achieving its goal of providing the largest possible area for public enjoyment and wildlife habitat.

A variance is also requested for the proposed wetland walkover structure crossing the onsite Coastal Wetland. The structure does not fully comply with applicable standards because it is designed to be ADA compliant, ensuring safe and equitable access for all members of the public. Specifically, the walkover structure proposes a width of 10 feet, deck board spacing of 7/16 inch, and the installation of handrails, which exceed standard dimensional requirements. The six (6) criteria required for a variance applies as follows:

1. The proposed wetland walkover structure is proposed to conform with applicable goal and policies of the Coastal Resource Management Program as the wetland walkover structure will provide access to the coast for all members of the public. The variance is required to ensure users are about to enjoy the coast in a safe manner. Additionally, the boardwalk is proposed to be ADA compliant to ensure the structure can be used by all members of the public.
2. The structure proposes minimal impacts to the existing Coastal Wetland and the buffer zone. The walkover structure proposes to be raised approximately 15 feet off the ground to provide minimal shading to the Coastal Wetland. The structure will only be used as a walking trail and provide an overlook location to allow for views of the coast, no use conflict are anticipated.
3. This variance is being requested to allow for ADA compliance and safety for all users. Although, a smaller boardwalk with less safety features could be proposed, this would limit the users of the structure.
4. The modifications requested are the minimum standards required for ADA compliance and to ensure safety of users.
5. The variance request is not due to any prior action of the applicant or the applicant's predecessors.
6. As previously stated, the variance from the standards is required as if not granted the users of the structure would be limited to those not requiring ADA standards. This would limit public availability to the coast and allow some users to only use portions of the public access paths. The goal of the Project is to improve safe access to the coast for all members of the public. If the variance is not granted, portions of the public would not be able to access the entirety of the primary access path.

6.1.2 Special Exceptions – Section 1.1.8

The project is seeking two special exceptions to allow for the proposed improvements to be fully implemented as depicted in the plan set and as previously described in the Application. The first Special

Exception is to allow for additional encroachment into Option 2: Variance Reduction 75-foot Buffer within the APC Zone. As described within previous Section 5.17, due to the various site constraints there is no feasible alternative to achieve the project goals of establishing the public access paths from Festival Pier to the Development Zone, promote economic development, restore habitat or to construct the stormwater basin to provide treatment for the project area as well as the contributing 15-acre upland urban watershed within the designated APC Zone without some minimal encroachment into the 75-foot Buffer.

The request complies with the Special Exception standards as follow:

1. The proposed work does serve a compelling public purpose and provides benefits to the public as a whole. The project meets criteria a. by satisfying public infrastructure by with respect to the creation of public access paths to improve pedestrian mobility and access from Festival Pier to River Street and eventually provide a new connection via a future pedestrian bridge the will connect Urban Coastal Greenways on the east and west side of the Seekonk River. The project will all create a stormwater basin that will provide water quality treatment for stormwater infrastructure from the upgradient 15-acre urban watershed. The water quality treatment credit from the watershed will be approved by RIDEM/CRMC to RIDOT for their current water quality treatment deficiency within the Seekonk River watershed.

   The project additionally meets criteria c. and will provide access to the shoreline for broad segments of the public.

2. The proposed improvements have been designed to minimize environmental impacts to the extent feasible. During the application process the Project Proponent met with CRMC staff to review PD Comments as well as various design alternatives to reduce impacts to maximum extent feasible within the APC Zone and provide adequate 2:1 mitigation as required.

3. As previously indicated above, the Project Proponent has met with CRMC Staff to review the proposed design and it is our position there are no other feasible locations on this property that could serve the purpose cited.

A second Special Exception is being requested to the prohibitions set forth in the Wetland Walkover Structures – Section 1.3.1(Q) to allow the structure to be constructed over a Coastal Wetland and to allow an observation deck to be constructed along the structure. The structure complies with the Special Exception standards as follow:

4. The proposed walkover structure serves a compelling public purpose by providing public access to Rhode Island's coastal resources. The structure is designed to allow a broad segment of the public to access and view the Coastal Wetland in a safe manner. The project is not proposed to serve a private or individual interest, but rather complies with Option C of the applicable section as an activity that provides shoreline access for the general public.

5. The structure was design to minimize environmental impacts to the extent feasible. Minimal impacts are proposed to the Coastal Wetland which only include installation of the helical support pilings. Significant improvements are proposed for the existing wetland that include removal of invasive species, increasing the size and grading the wetland, and planting the wetland with native beneficial species as described within Section 4.6 of this narrative. This walkover structure will allow for opportunities for the public to view and newly restored wetland along the coastline of Rhode Island.

6. The structure is proposed to allow users to access to coast and view the Coastal Wetland, no other locations on this property could serve these purpose.

6.1.3 Setbacks – Section 1.1.9

A 25' construction setback is proposed throughout the entire APC Zone and a construction setback that varies from 25' to 0' is proposed within the Development Zone from the limits of the UCG. The reduced construction setback is required to allow construction of the future Wood Development, a commercial structure, that is not proposed under this Assent Application and to provide the largest UCG feasible that encompasses a majority of the Site. A variance has been requested in Section 6.1.1 to allow for the reduced construction setback within the Development Zone.

6.1.4 Climate Change and Sea Level Rise – Section 1.1.10

A Coastal Hazard Analysis (CHA) worksheet is attached to this application in Appendix H.

6.1.5 Coastal Buffer Zones – Section 1.1.11

In accordance with CRMC's Report of Finding management within Coastal Buffer Zone is being conducted in accordance with CRMC's Buffer Zone/Invasive Management Guidance as detailed in Appendix E. Evaluations of habitat throughout the Site was conducted for presence of listed species within the designated Natural Heritage Area evaluations of the Buffer Zone for listed species were conducted for northern diamondback terrapin, salt reedgrass/big cordgrass, and foxglove beard-tongue by Environmental Professionals. It was determined that these species are not present throughout the Site and habitat at the Site is degraded and would not support these species. Information regarding evaluations can be found in the attached memorandum in Appendix D. Additionally, management zones have been broken down into specific zones that detail existing habitat and comply with CRMC's Buffer Zone/Invasive Management Guidance in Appendix E. Vegetation management is now proposed within three phases, that comply with the CRMC requirements to only manage 50% of the Buffer Zone during the initial phase of work. Within the first phase of management restoration planting areas have been further broken down into six (6) distinct locations. The proposed UCG width encompasses almost the entire Site, and includes public access and full management of stormwater for this Site and for future developments. Although buffer zone reductions are being sought to allow for proposed development, a significantly larger UCG is being provided than would be under standard UCG widths.

6.2 Tidal and Coastal Pond Waters - Section 1.2.1

6.2.1 Type 4 Multipurpose Waters – Section 1.2.1(D)

During this phase of construction, no bridge construction is proposed. Bridge construction will be proposed under a separate assent application. Only footings for the proposed bridge are being proposed under this application. Accordingly, no work within a Type 4 Water is proposed at this time.

6.2.2 Type 6 Waters Industrial Waterfronts and Commercial Navigational Channels – Section 1.2.1(F)

During this phase of construction, no bridge construction is proposed. Bridge construction will be proposed under a separate assent application. Only footings for the proposed bridge are being proposed under this application. Accordingly, no work within a Type 6 Water is proposed at this time.

6.3 Shoreline Features – Coastal Wetlands – Section 1.2.2(C)

Within the Report of Findings, CRMC states that salt marsh adjacent to Type 3, 4, 5, and 6 waters that are not designated for preservation may be altered only if:

1. The alteration is made to accommodate a designated priority use for that water area – The Waterbody adjacent to the Project is a Type 4 – Multipurpose Water and Type 6 – Industrial Waterfronts &

Commercial/Navigation Channel (Within river). Type 4 designated priority use includes recreational activities for general public use, the boardwalk proposed is considered a designated priority use. Additionally, dredging and channel maintenance is a designated priority use of Type 6 waterbodies, removal of excess sediment and organic debris is proposed within the wetland.

2. The Applicant has examined all reasonable alternatives and the Council has determined that the selected alternative is the most reasonable – Design alternatives were considered within the design phase of this boardwalk. This alternative was determined to be the best design for public use with the most limited impacts to the wetland. This design will allow users to experience the shoreline features in a manner that will not cause significant impact to the wetland.
3. Only the minimum alternation necessary to support the priority use is made – Direct impacts to the wetland will be limited to only restoration efforts and installation of pilings to support the boardwalk. Boardwalk pilings will result in minimal impacts to the wetland. This Project aims at increasing public recreation along the coast of Rhode Island and improve the ecosystem of the wetland and surrounding habitat.

6.4 Shoreline Features – Coastal Headlands, Bluffs, and Cliffs – Section 1.2.2(D)

The proposed project includes cutting into existing slopes rather than filling out over bluffs. Construction or alterations to coastal cliff and bluffs are proposed as all reasonable alternatives have been assessed and the proposed design is the most reasonable alternative.

6.5 Shoreline Features – Manmade Shorelines – Section 1.2.2(F)

Ownership and maintenance responsibilities for all pre-existing structures remains with the City of Pawtucket.

6.6 Areas of Historic and Archaeological Significance - Section 1.2.3

As per initial comments provided by the Rhode Island Historical Preservation and Heritage Commission (RIHPHC) in July 2025, further information on the project including a visual effects assessment for the Division Street Bridge, project plans, and a rendering of the proposed bridge will be provided under a separate Assent Application for the pedestrian bridge.

6.7 In Tidal and Coastal Pond Waters, On Shoreline Features and Their Contiguous Areas – Section 1.3.1

6.7.1 Filling, removing, or grading of shoreline features – Section 1.3.1(B)

The requirements of this section have been incorporated into the design of the proposed project and demonstrate consistency with the RI Sediment Control Handbook and the RIDISM.

6.7.2 Residential, commercial, industrial, and recreational structures – Section 1.3.1(C)

The proposed Wood Development and Penrose Developments that are depicted on the plans are not proposed under this Assent Application and will be proposed under a separate application. Although not proposed these developments have been accounted for within the design of this Project. Stormwater management, setbacks, buffer zones, mitigation, and other factors as proposed under this Assent Application have been designed to account for future developments. Once proposed these developments will comply with all necessary standards.

6.7.3 Treatment of Sewage and Stormwater – Section 1.3.1(F)

Refer to previous sections on stormwater management within this narrative.

6.7.4 Filling in Tidal Waters – Section 1.3.1(J)

No bridge work is proposed under this Assent Application, this standard no longer applies.

6.7.5 Coastal Wetland Mitigation – Section 1.3.1(L)

A variance will be required for work within the Coastal Wetland. Restoration of the onsite Coastal Wetland is proposed to improve the habitat and of the wetland and assist in salt marsh migration. The following Construction Sequence is proposed to retore the Coastal Wetland:

- Installation of erosion and sedimentation controls at the limits of work;
- Removal of the top growth of existing invasive species;
- Excavation of the root systems of the invasive species to approximately 4 feet down or when root systems are no longer visible;
- Expansion by excavating the surrounding area from approximately 1,200 sf to 10,915 sf;
- Grading of the newly established wetland area to allow even tidal inudation;
- Installation of native saltmarsh cordgrass and spread of the native seed mix;
- Installation of the helical pilings supports for the boardwalk;
- Construction of the boardwalk; and
- Final stabilization of the surrounding areas.

During restoration and construction activities a wetland scientist will be present. The newly established wetland areas will be monitored by an Invasive Manager for three (3) years for regrowth of invasive species, and when encountered management will occur for. Plantings proposed to be installed within the wetland will consist of 8,800 smooth cordgrass plugs within elevation 2-4 and 5,704 saltmarsh cordgrass plugs and other plantings within elevation 4-5. These will be installed to mimic natural conditions. Accordingly, no net loss of Coastal Wetland habitat will occur, Coastal Wetland habitat will increase. Helical pilings associated with the installation of the boardwalk will be the only alterations to the wetland outside of the restoration proposed. Pilings will consist of approximately minimal impacts to the Coastal Wetland. Restoration activities exceed the 2:1 requirements for mitigation, as the Coastal Wetland will be increase to approximately 10,915 sf. Further information regarding the restoration of the Coastal Wetland can be found in Section 4.6 of this narrative and Appendix E.

6.7.6 Public Roadways, Bridges, Parking Lots, Railroad Lines and Airports – Section 1.3.1(M)

No work applicable to this section is proposed during this phase of work as bridge construction is no longer proposed. An existing parking lot, adjacent to the plaza, will be reconstructed/resurfaced and provide public parking for the area. However, this section is only applicable to new construction and excludes resurfacing of pavement with no additional impervious surfaces.

6.7.7 Wetland Walkover Structures – Section 1.3.1(Q)

A wetland walkover structure is proposed to provide a primary pathway along the coast of the Seekonk River. Currently, the wetland is degraded and is proposed for restoration as a part of this Project. The wetland walkover structure has been designed to minimize impacts to the Coastal Wetland. According to CMRC's Report of Finding, for this work, a variance will be required for all standards not met and prohibitions contained within this Section will require the issuance of a Special Exception for relief (height, width, observation decks, etc). The following prohibitions and standards for Wetland Walkover Structures have been analyzed as follows:

Prohibitions:

a. An observation platform is proposed along the wetland walkover boardwalk. The observation platform is proposed within the middle section of the boardwalk and in the location of the observation platform the width of the boardwalk will be increased to approximately 14'8" for approximately 30' of the length of the boardwalk. This increase in width is proposed to allow the installation of benches and to allow users of the boardwalk to view and enjoy the surrounding Coastal resources. A Special Exception request for the proposed design of this boardwalk is within Section 6.1.2.

b. The wetland walkover structure is not proposed within a Type 1 or Type 2 water – does not apply.

c. The Wetland Walkover structure is proposed to be constructed over a Coastal Wetland, therefore, a Special Exception is required for this prohibition as detailed in Section 6.1.2 of this narrative.

d. The wetland walkover structure is proposed to be constructed within a public property owned by the City of Pawtucket. This complies with the standards as it is proposed to be used by the public and does not propose significant environmental impacts. Impacts are limited to only the installation of the helical pilings. The Project as a whole proposes to restore the currently degraded Coastal Wetland.

Standards:

a. The wetland walkover structure will be constructed during the winter dormant season, December 1 through March 15.

b. The boardwalk is proposed to be approximately 15 feet above the wetland substrate, exceeding the height requirements.

c. The width of the boardwalk is proposed to be 10-feet wide, exceeding the maximum width of 2.5-feet, this width is required to be ADA compliant – Variance required for this standard.

d. Pilings are proposed to be spaced 15 feet apart and will be installed manually.

e. Deck boards will be 2x6 decking material spaced at 7/16" apart which is closer together than the 1" minimum spacing requirements. This proposed spacing is required for ADA compliance – Variance required for this standard.

f. Handrails are proposed for the wetland walkover structure to allow for safety as the boardwalk is proposed above the CRMP heigh standards – Variance required for this standard.

g. All construction material will be limited to timber or recycled timber products with the exception of the pilings. No wood treated with creosote will be used as a building material.

h. Site plans have been drawn to scale and accurately show all property line and the affected wetland. The type of wetland that is present is a Coastal Wetland that is dominated for common reed and Japanese knotweed. This wetland will be restored as a Coastal Wetland with better tidal inundation and wetland vegetation as a part of this Project. The Site plan has been prepared by and stamped by an RI-certified professional engineer. Wetland flags can be rehung at CRMCs request.

i. Only one wetland walkover structure is proposed as a part of this Project.

j. No filling, removing, or grading of shoreline features are proposed as a part of constructing the boardwalk. Removing and grading is proposed within this wetland to restore it.

k. The walkover structure has been designed to resist displacement by storm surge and wind as the structure will be installed using galvanized helical pilings that will be inserted into the wetland. Bracing helical anchor pilings will also be installed to provide additional support to the walkover structure.

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

The requirements of this section for Type 4 waterbodies correspond with the goals of the MB SAMP for protecting and enhancing scenic value and from the river which include screening vegetation, preservation or planting of trees, and LID design techniques, which has been adhered to and described in previous sections of this narrative. Additionally, native vegetation within the APC Zone is proposed to be retained to the maximum extent practicable.

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

As outlined in previous sections of this narrative, the project provides protection and enhancement of public access to the shore through adherence to the MB SAMP and UCG requirements. Through the proposed ADA-compliant pathway, secondary pathway, pedestrian bridge, connection to existing sidewalks, viewshed, and signage, the project provides physical, visual, and interpretive access to the public through several means.

6.10 Sea Level Affecting Marshes Model (SLAMM) Maps – Section 1.8

The purpose of the SLAMM maps is to inform the public, state, and local authorities of the likely condition of coastal wetlands and their landward extent under future sea level rise scenarios and to assist in adaptive ecosystem management and planning. Upon review of the SLAMM Maps for Pawtucket, Rhode Island dated 4/2/2014, there is a potential encroachment of marsh within the project area for the 1-foot, 3-foot, and 5-foot sea level rise models. The area where this encroachment is predicted is in the vicinity of the proposed area of invasive species removal and wetland restoration as part of this project.

7.0 Summary

The proposed Tidewater Phase 1B Project will redevelop and restore the area of the Seekonk River waterfront, enhancing both public access and habitat quality of the Site. The Project will take place within the boundaries of the Coastal Resources Management Council Urban Coastal Greenway's (UCG) Metro Bay Region Special Area Management Plan and aims to accomplish several goals of CRMC's Urban Coastal Greenway's Special Area Management Plan, including increased public access to the coast, improvement of water quality via on-site vegetative stormwater treatment, preservation and restoration of habitat, and the improvements of the aesthetic value of Rhode Island's urban shoreline.