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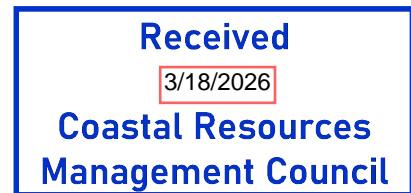
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March 18 , 2025

Jeffery Willis, Executive Director  
Rhode Island Coastal Resources Management Council  
Stedman Government Center  
4808 Tower Hill Road  
Wakefield, RI 02879



Re: CRMC File No.: 2026-01-056, The City of Pawtucket

Dear Director Willis,

Save The Bay, on behalf of our members and supporters, is pleased to offer comments pertaining to the Coastal Resources Management Council's (CRMC) File Number 2026-01-056, regarding the application submitted by the City of Pawtucket for construction associated with Phase 1B of the Tidewater Development Project along the Seekonk River in Pawtucket, RI.

This project proposes numerous variances pursuant to CRMC's Red Book, in a city with few green spaces remaining, therefore, careful consideration must be given to potential environmental harms, especially those from the cumulative impacts that may result from the proposed project. 650-RICR-20-00-1.1.7(A)(2). Current disturbed and developed conditions at and adjacent to the site already pose threats to the water quality of the Seekonk River and the adjoining undeveloped riverbank. Unfortunately, the currently proposed project in this notice depicts only a portion of the overall planned development of this site, making a full and informed evaluation of the cumulative impacts to the coastal buffer and the Seekonk River nearly impossible. Although it is clear that some future development of the site is contemplated, the potential impacts due to that future fragmented development cannot be fully considered in the context of only the current proposed work. Further, even if future fragmented development is part of a larger municipally-supported re-development plan, the proposed project must still be carefully evaluated to ensure it conforms with our state's coastal management program goals and policies, does not result in significant adverse environmental impacts, and is the minimum alternation necessary to complete to work.

The proposed project area contains a tract of approximately 7.7 acres of undeveloped forest, representing the largest single tract of undeveloped forest on the eastern bank of the Seekonk River in Pawtucket. In total, this represents roughly 28.3% of all forested areas along the entire eastern side of the Seekonk River in Pawtucket, and 15% of all forested area along both banks of the Seekonk River in Pawtucket (Figure 1). While much of the project area does contain large portions of non-native and invasive species, even non-native and invasive forested habitat acts as an important coastal buffer providing erosion control, filtration, nutrient uptake, and providing essential riparian habitat. Additionally, in an area like Pawtucket, dominated by urban development and non-natural spaces, any remaining green spaces, especially those with large shade trees (native or not), act as important shaded areas, providing some relief to the citizens living adjacent to these spaces from the urban heat islands that surround them. And yet, even despite the presence of this portion of urban forest, Tree Equity Score, a website which measures “how well the benefits of trees are reaching communities living on low-incomes, communities of color and others disproportionately impacted by extreme heat and other environmental hazards,” rates this particular neighborhood, or census block group, of Pawtucket with a score of 73, placing it as “high priority” for tree *planting* (anything below 70 is “highest priority”), and ranking it the 54th of 67 block group areas in Pawtucket.<sup>1</sup>

Given this relatively large tract of forest proposed to be impacted and the services that would be negatively impacted, Save The Bay is concerned regarding vegetation clearing, and the phrase “...increase public visual access to the Seekonk River” used in the public notice when describing the riverwalks and urban coastal greenway (UCG). The value of these walking paths is not sweeping views of manicured human-designed spaces, but instead the access provided to the surrounding natural habitats and the functions and values provided by those habitats. We would be against indiscriminate clearing of vegetation under the label “invasive management” strictly for the creation of a viewscape along these paths. That is why, as it pertains to any clearing and invasive species management on this site, Save The Bay asks that the Council require that priority be given to retaining, and wherever possible enhancing, as much tree canopy as possible within the project site. This is consistent with the variance condition that the proposed modification requested under a variance be “the minimum variance to the applicable standard(s) necessary to allow a reasonable alteration or use of the site.” 650-RICR-20-00-1.1.7(A)(4). This should include preserving any woody tree species over 10 inches DBH (diameter at breast height) regardless of native or non-native status. Although non-native trees have reduced habitat value, their presence in this urban environment surrounded by development increases their value tremendously. Mature trees are better at sequestering carbon, providing shade, mitigating climate change, reducing runoff volumes, and have more expansive root systems for stabilizing riparian soil and reducing erosion. Indiscriminately removing all non-native or invasive trees and replacing them with only native grasses, shrubs, and small trees sourced from landscaping would be an overall detriment to the functions and values of the coastal buffer and surrounding habitat. Focusing any non-native and invasive treatments solely on herbaceous and shrub species while allowing mature trees to remain will minimize impacts to this

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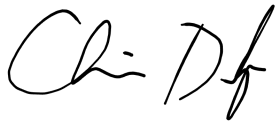
<sup>1</sup> Tree Equity Score [<https://www.treeequityscore.org/map#13.86/41.87076/-71.3757>], accessed March 17, 2026.

last largest remaining parcel of forest on the east side of the Seekonk River and the surrounding habitat and community.

In addition, given the proximity to the river and existing wetland, and the requests for variances and special exceptions for reductions in buffer zone widths, Save The Bay requests that any portion of the upper riverwalk, lower riverwalk, urban coastal greenway, or associated paths through the project zone which are currently planned to be paved, instead be constructed using pervious surface, to allow for precipitation and runoff to penetrate and percolate into the ground to allow for increased filtration and limit negative impacts to the river's water quality to the maximum extent possible.

Thank you for your consideration of these requests

Sincerely,



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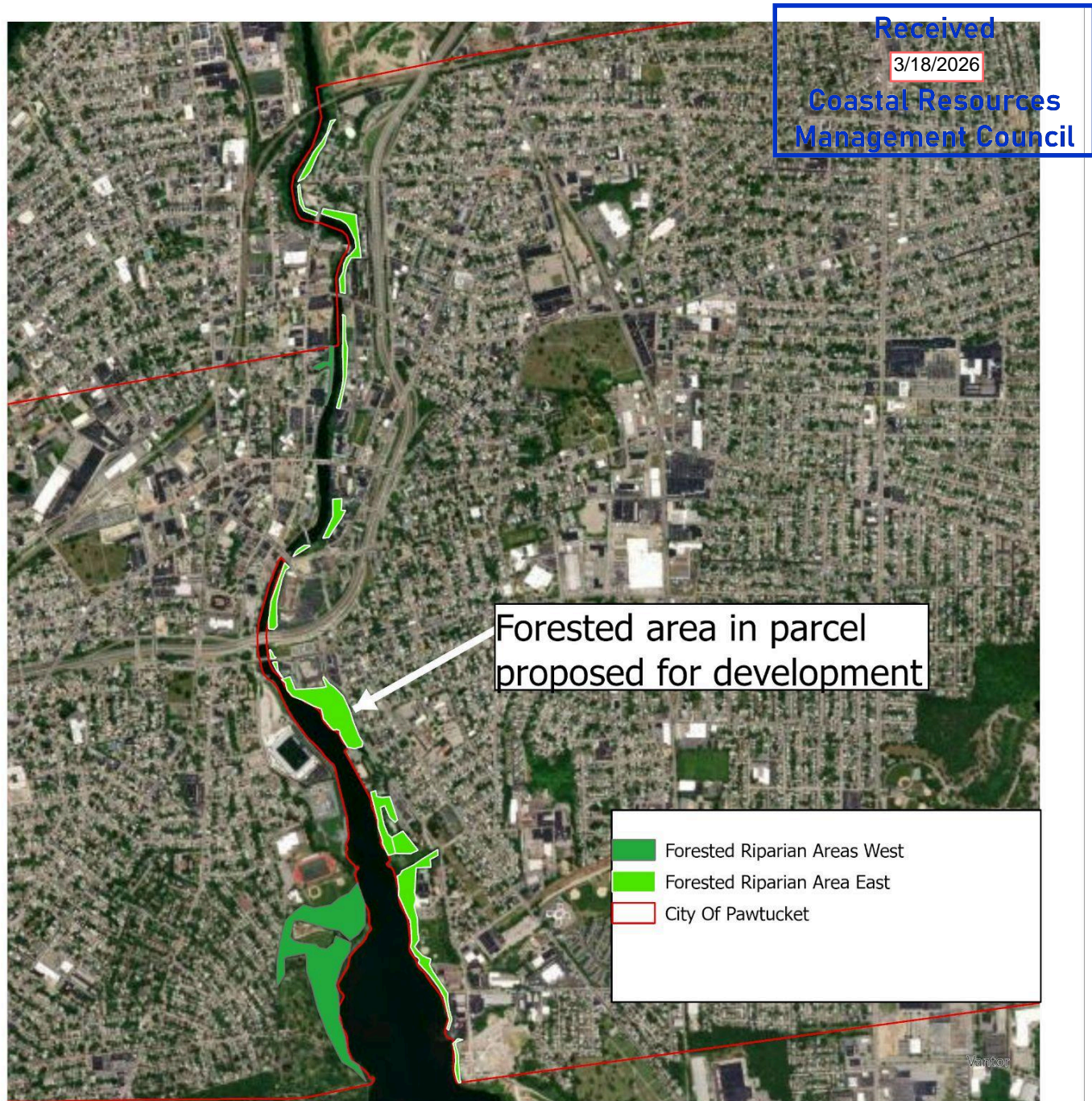


Figure 1: Aerial imagery highlighting the remaining riparian forest along the banks of Seekonk River in Pawtucket, RI. Image generated by Save The Bay on March 10, 2026.