



STATE OF RHODE ISLAND
COASTAL RESOURCES MANAGEMENT COUNCIL
STAFF REPORT TO THE COUNCIL

DATE: 6/3/2026
TO: Jeffrey M. Willis, Executive Director
FROM: Tracy Silvia, Env Scientist II; Richard Lucia, Env. Engineer IV

Applicant's Name:	City of Pawtucket
CRMC File Number:	2026-01-0562026-01-056
Project:	<p>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:</p> <ul style="list-style-type: none">• Construction of two pathways, a Lower Riverwalk (primary ADA public access path) and an Upper Riverwalk (secondary non-ADA maintenance access path). The upper path will consist of a stone dust 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;• Construction of one (1) stormwater basin and associated stormwater control measures;• Construction of one (1) underground infiltration chamber (UIC) system and associated stormwater control measures;• Construction of an outdoor amphitheater area• Construction of the Tidewater East Plaza;• Restoration of wetlands and uplands at the Site, including establishment of an Urban Coastal Greenway (UCG) buffer zone• Establishment of two (2) future development sites, referred to as the Wood Development and the Pennrose Development, along Portuguese Social Club Way and School Street that are to be permitted under a future Assent Modification
Location:	177 School Street, Pawtucket, plat 23 35A, lot 599,672,673 361177 School Street
Water Type:	Type 4, Multipurpose Waters, Seekonk River (tidal)
Coastal Feature:	Coastal wetland, Coastal bluff and/or Manmade shoreline (seawall fronting coastal bank) and the inland edge of coastal(s) feature shall be the top of the seawall, coastal bluff and/or inland edge of coastal wetland, as applicable

Plans Reviewed: ***“CITY OF PAWTUCKET, RI, TIDEWATER LANDING PHASE 1B STORMWATER PARK AND RIVERWALK EAST PERMITTING SUBMISSION JANUARY 2026...”*** dated 1/15/2026 sheets 1-52 by Beta Group, stamped by Kevin Aguiar, P.E.

Previous Relevant CRMC permits and preliminary determinations (PD):
2021-02-063 (PD) Feasibility of Sports Centered Mixed Use development
2025-04-090 (PD) Feasibility of Tidewater Landing Phase 1
2021-08-048 Sports Center mixed Use Development
2025-10-002, Tidewater Riverwalk Improvements
2025-10-028 Public Access Stairs
2025-02-055 Tidewater Remaining Riverwalk

Recommendation: **Approval**, with standard stipulations

NOTE TO COUNCIL: Special Exception request must be reviewed prior to reviewing the proposed project (reference report sections **D3, D16, D20, D22** and **entirety of F**)

A) INTRODUCTION:

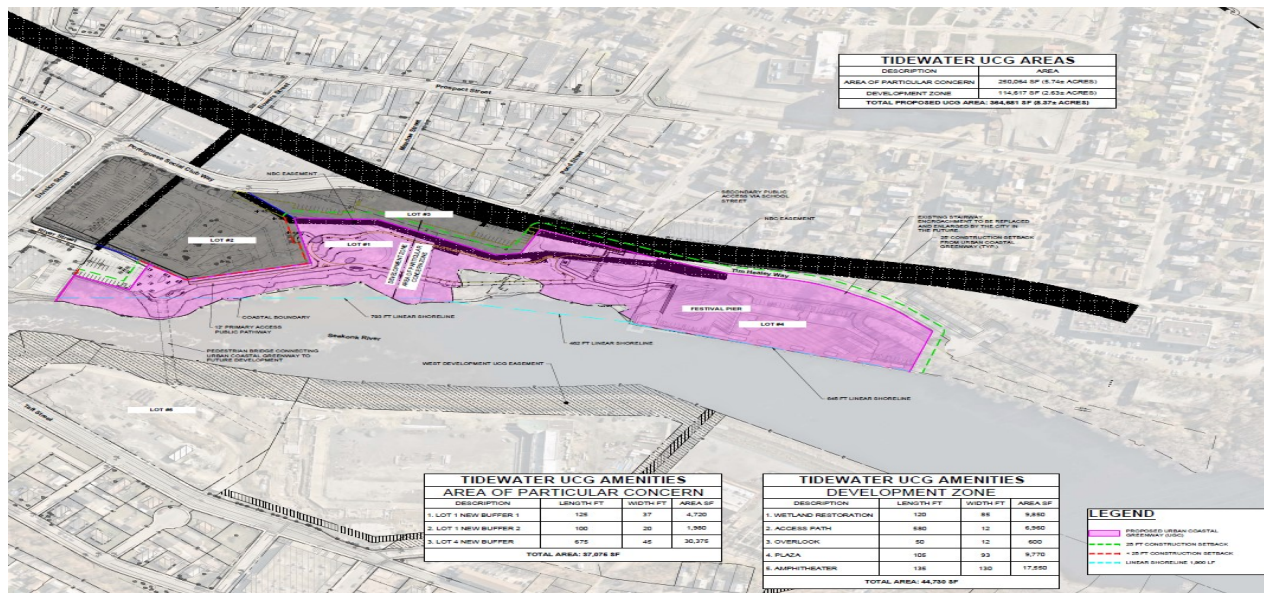
1—The project site (**Figure 1**) is located on the eastern side of the upper Seekonk River between I-95 & the City’s Festival Pier,. Phase 1A, permitted in 2021, included site remediation, stadium and plaza work, public access, stormwater management and an urban coastal greenway (UCG). Second phase 1B is the subject of this application and future phases include a pedestrian bridge linking both sides of the river and upland development. A public access stairway linking Pleasant, Division and Taft streets was recently permitted as well as remedial cleanup activities. PD #s 2021-02-063 & 2025-04-090 were issued for this shoreline.

Figure 1: Project site: south of Division St- West of Portugese Club Way/Tim Healey Way/School St



2—There are currently several parcels controlled by the City of Pawtucket in this area; Lots 599, 672, & 673 of AP 23 are proposed to be administratively reconfigured by the City should this project be permitted. The resulting parcels (Figure 2) will be Lot 1 (proposed UCG), Lot 2 (proposed Wood Development), Lot 3 (proposed Pennrose Development) and Lot 4 (part of AP 35A, Lot 361 containing Festival Pier). The entire parcel is located within either the MBS Development Zone or Area of Particular Concern Zone (**Figure 2**) and is bound by the river and adjacent streets. A Narragansett Bay Commission sewer easement and existing stormwater outfalls are also located across the parcels.

Figure 2: Overall layout of proposed Lots 1-4



3—Past human activity along this stretch of shoreline includes commercial and residential development, including underground storage tanks, extensive land clearing, parking lots, buildings, and an active Pier to the south; Extensive earthwork has also occurred. The following aerials depict development over time; The southern end has retained more vegetation due to steep slopes and presence of coastal wetland.

Figure 3: Shoreline circa 2011



Figure 4: Shoreline circa 1997



- Impervious Surface (April 21
- Hillshade
- Elevation
- Aerial Photographs (1939)
- Aerial Photographs (1951-1
- Aerial Photographs (1962)
- Aerial Photographs (1972)
- Aerial Photographs (1981)
- Aerial Photographs (1988)
- Aerial Photographs (1997)

Figure 5: Shoreline circa 1981



- Hillshade
- Elevation
- Aerial Photographs (1939)
- Aerial Photographs (1951-19
- Aerial Photographs (1962)
- Aerial Photographs (1972)
- Aerial Photographs (1981)
- Aerial Photographs (1988)
- Aerial Photographs (1997)

Figure 6: Shoreline circa 1972



- Impervious Surface (April 2020)
- Hillshade
- Elevation
- Aerial Photographs (1939)
- Aerial Photographs (1939)
- Aerial Photographs (1951-1952)
- Aerial Photographs (1962)
- Aerial Photographs (1972)
- Aerial Photographs (1981)

Figure 7: Shoreline circa 1962



- Impervious Surface (April 2020)
- Hillshade
- Elevation
- Aerial Photographs (1939)
- Aerial Photographs (1939)
- Aerial Photographs (1951-1952)
- Aerial Photographs (1962)

B) PROJECT SUMMARY:

1—Redevelopment of the site is proposed, including economic development (Tidewater East plaza over existing parking lot), public parking, future construction footprint (Wood and Pennrose Developments), wetland restoration & enhancement, buffer zone management, stormwater park & treatment BMPs, public boardwalk, walking trails, & associated amenities. Public access improvements linking Festival Pier and School Street are proposed, however, an un-housed population will be required to relocate due to site redevelopment. The City will control both the Urban Coastal Greenway (UCG) and the stormwater park.

2—The coastal feature for the site is coastal bluff, coastal wetland and manmade shoreline (vertical seawall). Work impacts include reconstruction/repair of existing wall areas, restoration and enhancement of degraded wetland, and re-grading of existing upland. Invasive management and buffer zone restoration and management activities are proposed. A conservation easement for the UCG and public access areas will be required prior to any Assent issuance for this work.

3—A pedestrian bridge to link the northern portions of Phase 1A & 1B plaza areas will be applied for separately; Only the eastern abutment is currently proposed, as a support component of the proposed plaza.

4—The project received some guidance under the 2021 PD report and extensive guidance in the 2025 PD. In addition, staff has met with the design consultants several times over the past few years, including on-site, regarding design considerations and permitting requirements. The Metro Bay Special Area Management Plan (MBS) and Redbook are applicable to this project as well as RIHPC, RIDEM and USACOE approvals.

5—The proposed work requires Variances to UCG buffer and wetland walkover standards as well as Special Exceptions to UCG and Redbook Prohibitions (buffer, work within wetlands). The project was sent to a 30day public notice period on 2/16/26, receiving comments 3/18/26 from Save the Bay.

C) APPLICABLE REGULATIONS:

REDBOOK	650-RICR-20-00-01	Comments
Section 1.1.6	Category B/Substantive Objection	Requires Cat B, Comment Received
Section 1.1.7	Variances	1.3.1(Q) & MBS 5.7.2
Section 1.1.8	Special Exceptions	1.3.1(L), 1.3.1(Q) & MBS 5.7.2
Section 1.1.9	Setbacks	25' inland of buffer zone/UCG
Section 1.1.10	Climate Change/Sea Level Rise	FEMA/Coastal Hazard Analysis
Section 1.1.11	Coastal Buffer Zones (BZ)	MBS UCG & BZ Management
Section 1.2.1(D) & (F)	Type 4 & 6 waters, Seekonk River	In-water work requires future assent
Section 1.2.2(C)	Coastal wetlands	Variances/Special Exceptions
Section 1.2.2(D)	Coastal Headlands/Bluffs	Proposed work on bluff
Section 1.2.2(F)	Manmade Shorelines	Work proposed, vertical walls
Section 1.2.3	Historic/Archaeologic Significance	RIHPC provided signoff
Section 1.3.1(B)	Filling/Removing/Grading	RISECH & RIDISM
Section 1.3.1(C)	Residential/Commercial...Structures	Public-private; requires future assent

Section 1.3.1(F)	Treatment of Sewage/Stormwater (SW)	Sewered/ Stormwater management
Section 1.3.1(J)	Filling in tidal waters	N/A until future bridge phase
Section 1.3.1(L)	Coastal Wetland Mitigation	Impacts, requires 2:1 replacement
Section 1.3.1(M)	Public roads/parking	Existing parking lots reconstructed
Section 1.3.1(Q)	Wetland walkover structure	Public boardwalk proposed
Section 1.3.5	Scenic Values	Applicable
Section 1.3.6	Public Access	Applicable
Section 1.3.8	SLAMM maps	Wetland restoration proposed
Metro Bay SAMP	650-RICR-20-00-05	Comments
Section 5.1(D)	Jurisdiction	Requires a permit
Section 5.2(A)(32), 5.4, 5.5	Urban Coastal Greenway (UCG)	Requirements addressed herein
Section 5.3(N)	Debris	O&M plan, cleanup/repair proposed
Section 5.7	Area of Particular Concern Zone (APC)	Southern portion of project, variance
Section 5.9	Development Zone (DZ)	Northern portion of project, variance
Section 5.11	Variance Requests	Requested (APC Zone Option 2)
Section 5.13	UCG Compensation	Requested for Development Zone
Section 5.14	Management & Maintenance	UCG Management Plan

D) STAFF REGULATORY COMMENTS (Redbook/MB SAMP):

1--Section 1.1.6 of the **Redbook** requires a Category B review for this project, with work proposed within a Coastal Wetland and on Coastal Features; MBS Section 5.1D requires permit review. Save the Bay comments were not deemed an objection based on prior staff conversation (see below).

2—Variances are required per Section 1.1.7 of the Redbook and Section 5.11 of the MBS for work within the construction setback, reduction in required UCG buffer width and wetland walkover design standards. The applicant has submitted variance criteria consistent with this Section and staff comments are below.

3—**Special Exceptions** are required per Section 1.1.8 of the Redbook and MBS for reduced buffer width and wetland walkover design options which are prohibited. Burdens of proof were submitted for review and the Council is required to review and approve/deny these Special Exceptions prior to reviewing the entire work.

4—Section 1.1.9 of the Redbook requires a minimum 50’ construction setback which is met for the project. MBS Section 5.9 requires a 25’ setback from the UCG which is not met within the entirety of the project. Temporary grading activities, and construction of public amenities (Lower and Upper Trails, overlooks, plaza) as well as stormwater BMPs are within portions of the UCG. A variance to 0’ setback along the Wood Development is proposed with variable widths proposed moving south.

5—Sea level rise (Section 1.1.10) impacts were examined during PD and current review The proposed FFE for the upland development is 19’ on the submitted CHA worksheet, which meets the recommended SDE for the site. The parcel rises steeply from the river along much of the shoreline, flattens out in the middle, and again rises steeply. The proposed future developments are located upgradient and all activities closest to shore are either UCG buffer or public amenities. Structural shoreline protection lines the parcel. The

erosional setback is met and the lowest area likely to be affected by 3' SLR (chosen design life) is Tim Healey Way, the access point for the existing Festival Pier boat ramp/public parking. CERI is inapplicable site and SLAMM maps (Section 1.3.8) reveal only a minor possibility of migration due to the steep grades.

6—The applicant has chosen the MBS UCG buffer zone requirements, rather than Redbook Section 1.1.11.

7—Redbook Sections 1.2.1(D), 1.2.1(F), & 1.3.1(J) are no longer applicable since the project design has changed from the PD report, and the proposed pedestrian bridge will be subject to a future application. Section 1.3.1(C) for proposed residential/commercial structures will also require future permitting; N/A now.

8—Section 1.2.2(C) regulates activities affecting coastal wetlands. For wetlands adjacent to Type 4 waters, alterations are allowed if the salt marsh is not designated for preservation (it is not), and if the alterations are made to: accompany a designated priority use for that water type. The applicant notes that recreational activities for public use (proposed boardwalk) meets this requirement. The boardwalk will provide scenic and educational opportunities for the public, connecting the north/south portions of the Lower Trail. The design alternative appears the most reasonable as part of the project goals and only the minimum alteration to support the priority use is chosen. The boardwalk will be supported by helical pilings/anchoring and installed during restoration. Staff is of the opinion that the project meets the requirements of this Section.

9--Alterations to coastal cliff and bluffs Section 1.2.2(D) have been eliminated in the proposed design.

10—Section 1.2.2(F) relates to manmade shorelines. The shoreline consists of sections of stone walls and sporadic mixed walls. These sections will not be impacted in the proposed design. Please note ownership and maintenance responsibilities for all pre-existing structures remain with the City of Pawtucket.

11—RIHPHC provided a signoff (Section 1.2.3) on the proposed project, noting the nearby historic structures and the site location within a Historic District. They also noted future application for pedestrian bridge work may require further review for impacts to the existing historic Division St. Bridge.

12—Any filling and grading (Section 1.3.1(B)) is integral to the stormwater treatment system and coastal wetland work, there are no staff objections to this activity.

13—Section 1.3.1(F) requires the treatment of stormwater runoff and sewage. To treat stormwater water quality, best management practices (BMPs) will be installed throughout the Site. Proposed water quality treatment and peak flow mitigation is provided through the proposed BMPs: a UIC system and an infiltration basin. Through the proposed BMPs, there is a surplus of water quality volume provided than what is required for the proposed site, therefore additional flows from the Portuguese Social Club Way Area and City of Pawtucket Area are also to be treated on-site. The proposed pretreatment units and BMPs will provide pretreatment and treatment for stormwater that is currently not treated under existing conditions. Pretreatment for TSS includes proprietary units to be installed upstream in the collection system and a sediment forebay upstream of a proposed infiltration basin. Based on the submitted plans, these structures have been designed in accordance with the Standards of the RI Stormwater Manual.

Please note the **City is asking for relief to allow the proposed 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 preventing the basin from being located outside of the UCG. Per prior PD, there are no staff objections to relief from this requirement. Due to the heavily developed area at the proposed Pennrose development, it is CRMC staff engineer's opinion this treatment train would be advantageous for treating this urban area and therefore has no objection to the overall approach. The City also notes that the surplus water quality volume treatment may be used toward RIDOT outstanding volumes for this watershed; If such is the case, the City and RIDOT are advised to notify the CRMC of such in order to update applicable permit conditions. Note any new development shall be tied into the existing sewer line, all pertinent and required approvals shall be obtained prior to any tie-ins to the existing sewer lines.

14—Mitigation is required for alterations to coastal wetlands per Section 1.3.1(L). The applicant is proposing to alter the entirety of the existing degraded wetland (Phragmites-filled tidal channel) and a 2:1 replacement is required. The proposal is to restore the wetland by removing the existing invasives, sediment and root systems, re-grading the site to appropriate hydrologic conditions, and replanting the area with native salt marsh species. Additionally, the applicant proposes to excavate the areas of adjacent hydric soils (likely historic filled wetland), including the Japanese knotweed monoculture; Regrading and replanting with native coastal wetland species will take place, overseen by a Wetland Scientist and CRMC-Certified Invasive Manager and monitored for three years post-construction. Existing wetland area is ~1200sf, and proposed restored/enhanced wetland area is 10,915sf, well over the 2:1 mitigation requirement.

15—No new public roads or parking lots will be created (Section 1.3.1(M)); Former parking will be reconstructed for the proposed developments and the public. See below for MBS parking discussion.

16—Section 1.3.1(Q) allows for the construction of wetland walkover structures. The applicant proposes to construct this boardwalk across the restored/enlarged coastal wetland. Construction impacts are minimized due to the proposed height over grade, helical pile/anchor installation and existing degraded wetland conditions. **A variance is required to the width requirement (10'), to the deck board spacing of 7/16" and the installation of handrails.** In addition, a **special exception is required for installation of an observation deck** along the walkover; See staff discussion re the variance & special exception below.

17—Sections 1.3.5 & 1.3.6 relate to protection and enhancement of the scenic value and public access to and along the coast. The applicant's use of the UCG, including screening vegetation, restoration planting, LID design as well as construction of proposed ADA-compliant pathways, wetland restoration, observation areas and future connections to nearby public areas (Tidewater West, School/Division/Pleasant Sts, Festival Pier) appear to meet the goals of these sections. The applicant is meeting the MBS public access requirements.

18—The project site is located entirely within the **Metro Bay SAMP** (MBS), the northern portion within the Development Zone and the southern portion within an Area of Particular Concern Zone. Within these Zones, there are also identified High Priority Conservation and Restoration Areas. The applicant is choosing to utilize the MBS' UCG requirements rather than the Redbook buffer zone in order to jointly pursue the private-public economic redevelopment, public access, stormwater and habitat improvement project.

19—MBS Section 5.3(N) requires an O&M plan for site infrastructure, which has been submitted. Repairs and replacement are proposed, as necessary, to portions of the existing walls on the northern end of the site and all solid waste will be appropriately removed; There are old vehicles, garbage, household trash, four human encampments, and commercial debris existing across the project site.

20—MBS Sections 5.7 & 5.8 relate to Areas of Particular Concern (APC) & Development Zones (DZ), split between the southern and northern portions of the site. Currently, the existing habitat conditions are impacted by heavily invasive and/or non-native as well as anthropogenic former and current uses of the site. Open meadow clearings exist within predominant forested upland and the degraded wetland. Several mature trees with large canopy exist within a mix of native, non-native and invasives species. Non-native black locust was most common (33%), with only 36% of trees native. The understory is interspersed with human campsites, debris and paths with dense stands of invasive shrubs (ex. amur honeysuckle, burning bush, privet, multiflora rose, Japanese knotweed) and vines (bittersweet, clematis).

Buffer zone management is proposed, the degraded wetland will be restored and native trees will be protected as much as possible, with snags and native mature trees identified in particular for habitat value as well as trees with safety/disease concerns for removal. The entirety of the parcel is mapped as a Natural Heritage Area, specifically for northern diamondback terrapin, salt reedgrass/big cordgrass, and tall white/foxtail beard-tongue. Staff concurs with the submitted narrative that the terrapin is unlikely to utilize the site as either foraging or nesting habitat at this time. The beard-tongue available habitat consists of cleared land or invasive grasses/shrubs. The parcel is also noted as habitat potential for the northern long-eared bat, monarch butterfly, tri-colored bat and several fishes by NOAA/USFWS. No in-water work is proposed, the wetland is being restored and the potential habitat value for the butterfly and bat species will be enhanced by the proposed work. No critical habitat areas were identified for these species. **A Variance and Special Exception to the required buffer zones are being requested, as detailed herein.**

21—A UCG Management Plan per MBS Section 5.14 has been submitted. Future proposed management includes invasives removal and native restoration planting. An easement for the UCG and public components of the site is currently under Legal Review. Should the Council approve the project, standard stipulations will require the easement to be finalized and recorded as well as the UCG Management Plan to be finalized prior to Assent issuance; Staff is currently working with the applicant on this process.

22—The MBS has several requirements for the UCG, described in Sections 5.2, 5.3, 5.4, 5.5 and also 5.13. These relate to the size of the required buffer zone and setback distances, the variance options and the compensation available. Specifically, the DZ requires a 100' buffer zone plus 25' construction setback and the APC requires a 150' buffer zone plus 25' setback. Viewsheds will be improved for the public and impervious areas created only for ADA-compliant public access within the UCG.

23—MBS Sections 5.4 & 5.5 contain standards for the entire UCG. The project exceeds the minimum required 15% total vegetation requirement and meets the requirements for stormwater management, excepting the variance request for siting location. Public access is proposed throughout the entire UCG and project illumination requirements are met. **The applicant seeks a variance to the construction setback, for a reduction to 0' in some areas of the DZ, and variable reductions to the required 25'.**

24—MBS general UCG standards, which are met by the project, include compensatory averaging for buffer zones, public access and easement boundaries, signage and emergency access. UCG vegetation standards are met and a management plan has been prepared, which includes invasives removal and native restoration planting. The City has provided 10% additional parking to mitigate a reduction in secondary access points.

25—MBS Section 5.7 relates to the APC requirements. Within this zone, invasive management, re-grading, buffer restoration planting and coastal wetland restoration is proposed. Debris cleanup, public access and the proposed stormwater park are also proposed within this Zone. The required buffer zone for the APC (150') is being proposed as 75' under Option 2 of this Section. Within the DZ (Section 5.9), a variance to the required 100' buffer zone under Option 3, Compact 50', with additional compensation for reduced width is proposed. Within both Zones, the applicant has demonstrated that the compensated areas are equal to or greater than the required buffers under Options 2 & 3. Variance criteria has been submitted (Section 5.11).

E) VARIANCES:

1--The Project is designed to adhere to MBS Section 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 Width (APC) and Option 3: Compact UCG Width (50 feet) with compensation for the reduced UCG width (DZ).

2--A variance to applicable design standards of Section 1.3.1(Q) is also requested for the proposed wetland walkover structure crossing a coastal wetland in order to achieve ADA compliance.

3—Staff concurs with the applicant's variance criteria and supports the proposed variance request as the project meets or exceeds most MBS requirements, provides significant public access, habitat restoration and improved stormwater treatment for the area.

F) SPECIAL EXCEPTIONS:

1—The project is seeking two special exceptions (Redbook Section 1.1.8) to allow for the proposed improvements to be fully implemented as depicted in the plan set and as 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. The MBS does not allow for further variances beyond Option 2, so a Special Exception is required. The work within this area is due to steep grades and siting of public access (boardwalk/trails) and site grading for stormwater management. Staff has no objection to this request.

2--The second special exception is to allow an observation deck on the proposed boardwalk within a coastal wetland. The boardwalk is for public access and is to be constructed during restoration of the degraded wetland. Staff has no objection to this request.

3--In order for a special exception to be granted to a prohibited activity the proposed activity must serve a compelling public purpose which provides benefits to the public as a whole as opposed to individual or private interests. The activity must meet the following:

- An activity that provides access to the shore for broad segments of the public.
- All reasonable steps shall be taken to minimize environmental impacts and/or use conflict.
- There is no reasonable alternative means of, or location for, serving the compelling public purpose cited.

4—The applicant has addressed the special exceptions within the submitted narrative and staff concurs with the compelling public purpose, minimization of impacts and chosen design alternative. **Should the Council approve the Special Exceptions, the remainder of the proposed project can be reviewed for decision.**

G) COMMENTS RECEIVED:

1—Per comment letter received, “Save The Bay [STB] 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”. Although staff understands the cited STB concern, there should be minimal impact from using an impervious surface, since the runoff from the walkways will end up penetrating into the existing ground on either side of the walkways. Additionally maintenance (snow removal especially) could be an issue if for instance a crushed stone surface was installed. There are no staff objections to the use of asphalt surface for this portion of the walkway.

2—STB also notes the presence of vegetated portions of the site, particularly in the southern APC Zone. Staff has voiced the same concern to the applicant; The project identifies 800+ trees within the UCG, and designates many for preservation, including non-natives which currently serve as canopy trees providing important shade, erosion control and habitat value. A UCG Management Plan has been developed for the site, which staff supports and is working on finalizing with the applicant.

H) CONCLUSION:

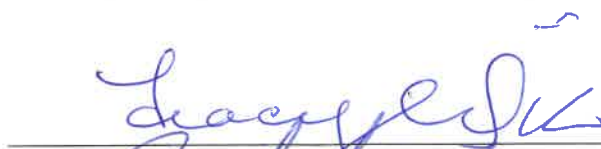
1-- With regards to the stormwater treatment and the overall project, the CRMC staff engineer’s opinion is this treatment train would be advantageous for treating this urban area and therefore the engineer does not have an objection to the overall project and recommends approval.

2—In regards to the proposed wetland restoration, UCG management plans and overall project, it is the staff biologist’s opinion that the project provides important public access, habitat value and stormwater treatment. Staff supports the proposed project and requested variance/special exception relief.

3--Overall, the applicant has worked closely with staff from preliminary stages to final design in order to best meet RICRMP regulations for Phase 1B. Based on the above, CRMC staff recommend approval. Finalization of UCGMP/easement will be completed shortly. It is also staff opinion that the applicant has met the requirements for the granting of a special exception identified in CRMP Red Book § 1.1.8 and therefore, there are no objections to the granting of the Special Exception for a prohibited activity.

4—Standard stipulations for O&M, UCGMP, & Easement are withheld pending Council’s Decision.

Staff Biologist



T. Silvia

Staff Engineer



R. Lucia