

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS  
COASTAL RESOURCES MANAGEMENT COUNCIL  
INTER-OFFICE MEMORANDUM

DATE: November 6, 2013  
TO: Grover J. Fugate, Executive Director  
FROM: James Boyd, CRMC Coastal Policy Analyst  
SUBJECT: **CRMC File No. 2013-10-012**

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**Applicant's Name:** I-195 Redevelopment District Commission, Jan Brodie, Executive Director;  
c/o RI Economic Development Corporation, 315 Iron Horse Way, Suite 101, Providence, RI 02908

**Project:** I-195 Redevelopment District Stormwater Master Plan

**Location:** I-195 Redevelopment District defined in R.I.G.L. § 42-64.15-5 and located at Plats 18, 20, 21 and 24, Lots (not yet assigned); at Richmond, Dyer, Chestnut and South Main Streets, Providence, RI,

**Water Type/Name:** Type 5, Providence River

**Coastal Feature:** Granite block stacked wall with narrow fringe salt marsh along some sections

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**STAFF REPORT**

Proposed Project

The I-195 Redevelopment District Stormwater Master Plan ("Stormwater Master Plan") has been submitted to establish an overall stormwater permitting approval process framework for the redevelopment of twenty-one (21) separate parcels located within the old Route I-195 right-of-way and under the jurisdiction of the I-195 Redevelopment District Commission. These twenty-one parcels are identified in the Stormwater Master Plan as follows: 1A, 2, 5, 6, 8, 9, 14, 15, 22, 25, 27, 28, 30, 34, 35, 37, 41, 42, P2, P3 and P4. Parcels P2, P3 and P4 are planned public parks. The Stormwater Master Plan is also intended to cover any adjacent parcels that may fall under the jurisdiction of the I-195 Redevelopment District Commission as provided for in R.I.G.L. § 42-64.14. The project is subject to state stormwater regulatory permitting implemented by the CRMC for parcels within its coastal jurisdiction (detailed below) and DEM through its Water Quality Certification program. In addition, the proposed redevelopment project is subject to the DEM-administered RIPDES general permit for stormwater discharge associated with construction activity.

The Stormwater Master Plan proposes to apply the applicable state stormwater management requirements of the RI Stormwater Design and Installation Standards Manual (RI Stormwater Manual), administered by both CRMC and DEM through their respective regulatory programs, on a district-wide basis rather than strictly on an individual parcel basis. In preliminary discussions with the I-195 Redevelopment District Commission last year, CRMC and DEM suggested using a master plan approach to manage stormwater runoff for the redevelopment parcels. This approach is intended to provide a coordinated and predictable permitting process to assist the I-195 Redevelopment District Commission in the marketing and selling of the parcels,

especially since it is expected that it may take more than 10 years before all of the available parcels are sold and developed. Accordingly, the I-195 Redevelopment District Commission has requested that the initial CRMC Assent for the Stormwater Master Plan be granted for a ten (10) year period. CRMC staff concurs and recommends that this request be granted by the Council. The Stormwater Master Plan establishes an orderly process for CRMC and DEM in their review and permitting of District projects as they come forward over a period of time.

The Stormwater Master Plan applies to the I-195 Redevelopment District that encompasses 41.4 acres that consist of 25.83 acres of land within the District parcels (the result of the old Route I-195 demolition) with the remaining area as public roadways. Some of these public roadways within the District will be constructed to reconnect City streets that were cut off by the old I-195 highway. RIDOT will complete these under separate contracts as described below. The I-195 Redevelopment District Commission will exercise local site plan and building design review and permitting authority pursuant to the powers granted to it by the General Assembly in R.I.G.L. § 42-64.14.

### CRMC Jurisdiction

As it did for the RIDOT Route I-195 relocation project authorized under CRMC Assent 2001-12-018, the CRMC will have review authority for the entire I-195 Redevelopment District project pursuant to Section 320 of the Coastal Resources Management Program (CRMP). As detailed below, the CRMC will require separate permits for any alteration or development proposal on parcels 1A, 2, 5, 14, P2 and P4, as these parcels either directly abut the Providence River or are located within the 200-foot jurisdictional contiguous area. Additionally, these 6 parcels are subject to the requirements of the Metro Bay SAMP Urban Coastal Greenway policy. The CRMC will review the remaining 15 parcels of the 21 parcels of the District as Category A permits only for the purpose of verifying that the proposed stormwater treatment practices associated with these individual parcels are consistent with Section 300.6 of the CRMP and the design, installation, and operation and maintenance requirements of the RI Stormwater Manual, and to affirm these individual parcel stormwater management plans for conformance with the CRMC-approved Stormwater Master Plan.

### Project Background

The relocation of Route I-195 was previously approved under CRMC Assent 2001-12-018. The relocation project included construction of the new 900-foot long I-Way bridge between the Washington Bridge to Route I-95 along the Fox Point Hurricane Barrier alignment, a new fully directional interchange with Route I-95 north and south, demolition of the old portion of Route I-195 through downtown Providence, the construction of a new separate stormwater drainage system, and the rebuilding/restoration of the city street pattern along the demolished portion of the old Route I-195 right-of-way. The rebuilding/restoration of the city street pattern along the west and east sides of the Providence River will be completed under RIDOT Contracts 14 and 15, respectively. When these two contracts are completed in the near future the current combined sewer drainage system will be partially replaced with a separate storm sewer system, including a series of new catch basins, serving the roadway network in the vicinity of the demolished I-195 right-of-way. The new separate stormwater drainage system will discharge directly into the Providence River and not into the Narragansett Bay Commission (NBC) combined sewer system. The new stormwater drainage system has been designed and sized based on full urban build out of the contributing drainage area for the volume of runoff associated with a 25-year storm event and will result in an overall net reduction in the volume of stormwater runoff into the surrounding NBC combined sewer system.

Metro Bay SAMP Urban Coastal Greenway Policy

Parcels 1A, P2 and P4 abut the Providence River shoreline, while parcels 2, 5 and 14 are within the 200-foot contiguous area of a shoreline feature. Previously, there was a Parcel 3, but it has since been combined with Parcel 2 to form a single parcel. A CRMC Assent will be required for any alteration or development on these 6 parcels. Since these parcels are located within the Metro Bay SAMP area, the Urban Coastal Greenway (UCG) policy is applicable. Parcels 2, 5 and 14 are separated from the shoreline feature by a public roadway. Thus, the requirement for public access to and along the shoreline for any development proposal on these parcels will not be required in accordance with UCG policy Section 180. All 6 of these parcels, however, must comply with the stormwater management and vegetative cover (15% minimum) requirements as specified in Section 150.1(a) and (b) of the UCG policy.

Parcels P2 and P4 are planned public parks and may be considered compliant with the UCG policy, pursuant to Section 140.4(e), because the primary purpose of these parcels is to provide public access and they are owned and controlled by a public entity. As for parcel 1A, it is currently used as a public park resource. The existing boardwalk on this parcel adjacent to the river was constructed under CRMC Assent 1998-06-055 and provides public access along the shoreline in this location. If development is proposed on parcel 1A, it will be subject to the applicable setback and other standards of the CRMP and UCG policy. However, development is questionable on this parcel given its less than 50-foot width and compliance with applicable standards, along with the existing dedicated public access and public amenities located on this parcel.

In discussion between the I-195 Redevelopment District Commission and CRMC staff it was determined that due to the specialized nature of the District, the goals for future development on the District parcels, and that the District is being permitted as one large multi-phased project, the aggregate 15% vegetative cover requirement for the 6 individual parcels subject to UCG requirements may be provided on the two planned park parcels, P2 and P4. Besides these two park parcels, the other parcels subject to the UCG requirements are 1A, 2, 5, and 14 with a total combined parcel area of 3.09 acres. The combined 15% vegetative cover area requirement for these four parcels is 0.46 acres. The combined area of Parcels P2 and P4 is 8.51 acres of which 4.2 acres will be vegetative cover. The total 15% vegetative cover requirements for Parcels P2 and P4 is 1.28 acres. Therefore, Parcels P2 and P4 can easily provide the required combined vegetative cover requirement of 1.74 acres for all six parcels. Development projects on the parcels will be required to meet the RI Stormwater Manual standards that are low impact development (LID) based stormwater treatment practices. Accordingly, CRMC staff is satisfied that the District project when fully constructed will be compliant with the requirements of Sections 150.1(a) and (b) of the UCG.

Stormwater Runoff Treatment

As noted above, it is more efficient from a logistical and regulatory stormwater permitting basis to review the 21 parcel I-195 Redevelopment District project first under an overall Stormwater Master Plan. This allows for the establishment of an overall water quality treatment volume, followed by individual parcel requirements to attain the overall volume to be treated to meet the state stormwater standards for redevelopment projects. The Stormwater Master Plan specifies that the project will be reviewed in accordance with Section 3.2.6 of the RI Stormwater Manual. That is, the project will be reviewed for stormwater management purposes as a redevelopment project because 10,000 or more square feet of existing impervious area will be disturbed, and there is more than 70% impervious cover area under the existing conditions (pre-highway demolition) for the 41.4 acre project. The Stormwater Master Plan provides Table 2: Water Quality Volume (WQv) that specifies the water quality treatment volume required on each of the 21

District parcels. It is based on the amount of total impervious area after parcel construction and whether the parcel is wholly or partially disconnected from the Narragansett Bay Commission storm sewer collection system. CRMC staff has reviewed the assigned stormwater treatment volumes and agree with the table information.

The I-195 Redevelopment District Commission has agreed to track stormwater compliance on all parcels within the District and will provide the applicable information for each subsequent application for parcel development. CRMC staff has determined that the proposed project will be compliant with Section 300.6 (Stormwater and Sewage) of the CRMP and has prepared appropriate stipulations to ensure that future parcel development will be constructed to meet state stormwater treatment requirements.

CRMC Staff Summary and Recommendation

The I-195 Redevelopment District Stormwater Master Plan is the result of a thoughtful and planned partnership and coordination effort between the I-195 Redevelopment District Commission, its consultant engineers from Fuss & O'Neil, and the staff of the Coastal Resources Management Council, Department of Environmental Management, Narragansett Bay Commission and the City of Providence Public Works Department. The Stormwater Master Plan establishes the permitting framework for future development within the I-195 Redevelopment District for compliance with state stormwater treatment and management requirements. Essentially, the Stormwater Master Plan will facilitate future parcel stormwater permitting through a flexible approach to the location of stormwater treatment practices within the I-195 Redevelopment District in meeting the established overall District stormwater treatment volume.

A joint 30-day public notice was issued by CRMC and DEM on October 4, 2013 with a public comment filing date of November 5. There were no public comments filed with the CRMC during the 30-day public comment period.

- The proposed I-195 Redevelopment District Stormwater Master Plan establishes a permitting framework for future parcel development within the I-195 Redevelopment District. There is no construction of stormwater facilities authorized at this time. It is expected that future construction will be authorized as applications are filed for individual parcels as noted herein.
- The Stormwater Master Plan meets the requirements of Section 300.6 of the CRMP and there are no variances or Special Exceptions required.
- The Stormwater Master Plan meets the requirements of Sections 150.1(a) and (b) of the Metro Bay SAMP Urban Coastal Greenway policy as it pertains to Parcels 1A, 2, 5, 14, P2 and P4.
- A DEM Water Quality Certification is required for the I-195 Redevelopment District Stormwater Master Plan and will be incorporated as part of the CRMC file.

CRMC staff recommends approval of the I-195 Redevelopment District Stormwater Master Plan and has prepared appropriate Assent stipulations for the Council's consideration.

Signed: Jambo Boyd

Date: November 6, 2013



State of Rhode Island and Providence Plantations  
Coastal Resources Management Council  
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**ASSENT**

CRMC File No.: 2013-10-012

CRMC Assent No.: B2013-10-012

Whereas,  
of

**I-195 Redevelopment District Commission  
C/o RI EDC  
315 Iron Horse Way, Suite 101  
Providence, RI 02908**

has applied to the Coastal Resources Management Council for assent to: **implement the I-195 Redevelopment District Commission Stormwater Master Plan**, and represents that the I-195 Redevelopment District Commission is the owner of the riparian rights attached to the property involved and submitted plans of the work to be done.

Now, said Council, having fully considered said application in accordance with all the regulations as set forth in the Administrative Procedures Act does hereby authorize said applicant, subject to the provisions of Title 46, Chapter 23 of the General Laws of Rhode Island, 1956, as amended, and all laws which are or may be in force applicable thereto: **implement the I-195 Redevelopment District Stormwater Master Plan. No construction work associated with stormwater drainage is proposed at this time or authorized by the CRMC. The project area is the I-195 Redevelopment District defined in R.I.G.L. § 42-64.15-5 and located at plats 18|20|21|24, lots (not yet assigned); at Richmond, Dyer, Chestnut, & South Main Streets, Providence, RI, in accordance with said plans submitted to this Council and approved by this Council. In accordance with revisions to R.I.G.L. § 46-23-6.3 Expiration Tolling Periods (as amended effective June 26, 2013), all work being permitted must be completed on or before July 1, 2025 after which date this assent is null and void, unless written application requesting an extension is received by CRMC sixty (60) days prior to expiration date.**

Applicant agrees that as a condition to the granting of this assent, members of the Coastal Resources Management Council or its staff shall have access to applicant's property to make on-site inspections to insure compliance with the assent.

Licensee shall be fully and completely liable to State, and shall waive any claims against State for contribution or otherwise, and shall indemnify, defend, and save harmless State and its agencies, employees, officers, directors, and agents with respect to any and all liability, damages (including damages to land, aquatic life, and other natural resources), expenses, causes of action, suits, claims, costs (including testing, auditing, surveying, and investigating costs), fees (including attorneys' fees and costs), penalties (civil and criminal), and response, cleanup, or remediation costs assessed against or imposed upon Licensee, State, or the Property, as a result of Licensee's control of the Property, or Licensee's use, disposal, transportation, generation and/or sale of Hazardous Substances or that of Licensee's employees, agents, assigns, sublicensees, contractors, subcontractors, permittees, or invitees.

Nothing in this assent shall be construed to impair the legal rights of this granting authority or of any person. By this assent the granting authority by no manner, shape, or form assumes any liability or responsibility implied, or in fact, for the stability or permanence of said project; nor by this assent is there any liability implied or in fact assumed or imposed on the granting authority. Further, the granting authority by its representatives or duly authorized agents shall have the right to inspect said project at all times including, but not limited to, the construction, completion, and all times thereafter.

This Assent is granted with the specific proviso that the construction authorized therein will be maintained in good condition by the owner thereof, his heirs, successors, or assigns for a period of fifty (50) years from the date thereof, after which time this permission shall terminate necessitating either complete removal or a new application.

Permits issued by the CRMC are issued for a finite period of time, confer no property rights, and are valid only with the conditions and stipulations under which they are granted. Permits imply no guarantee of renewal, and may be subject to denial, revocation, or modification.

If this matter appeared before the full Council, a copy of the legal decision from this proceeding may be acquired by contacting the CRMC office in writing.

A copy of this Assent shall be kept on site during construction.

Application for future alteration of the shoreline or other construction or alteration within the CRMC jurisdiction shall be submitted to the CRMC for review prior to commencing such activity.

All applicable policies, prohibitions, and standards of the RICRMP shall be upheld.

All local, state or federal ordinances and regulations must be complied with.

Please be advised that as a further conditions of this Assent, it is hereby stipulated that you and/or your agents shall comply at all times with Federal and State Water Quality Standards and other State standards and regulations regarding water quality, and shall exercise such supervision over and control of these facilities to prevent the dumping or discarding or refuse, sanitary wastes and other pollutants in the tidal waters, either from vessels docked at said facilities or from land adjacent thereto.

No work that involves alteration to wetlands or waters of the United States shall be done under this Assent until the required Federal Permit has been obtained.

Non-compliance with this assent shall result in legal action and/or revocation of this permit.

**CAUTION:**

**The limits of authorized work shall be only for that which was approved by the CRMC. Any activities or alterations in which deviate from the approved plans will require a separate application and review. If the information provided to the CRMC for this review is inaccurate or did not reveal all necessary information or data, then this permit may be found to be null and void. Plans for any future alteration of the shoreline or construction or alteration within the 200' zone of CRMC jurisdiction or in coastal waters must be submitted for review to the CRMC prior to commencing such activity.**

**Permits, licenses or easements issued by the Council are valid only with the conditions and stipulation under which they are granted and imply no guarantee of renewal. The initial application or an application for renewal may be subject to denial or modification. If an application is granted, said permit, license and easement may be subject to revocation and/or modification for failure to comply with the conditions and stipulations under which the same was issued or for other good cause.**

**ATTENTION: ALL STRUCTURES AND FILLED AREAS IN THE TIDAL, COASTAL, OR NAVIGABLE WATERS OF THE STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS ARE SUBJECT TO:**

1. The Superior Property Rights of the State of Rhode Island and Providence Plantations in the Submerged and Submersible Lands of the Coastal, Tidal, and Navigable Waters;
2. The Superior Navigation Servitude of the United States;
3. The Police Powers of the State of Rhode Island and the United States to regulate Structures in the Tidal, Coastal, or Navigable Waters.

THE SUBMERGED AND SUBMERSIBLE LANDS OF THE TIDAL, COASTAL, AND NAVIGABLE WATERS OF THE STATE ARE OWNED BY THE STATE AND HELD IN TRUST FOR THE PUBLIC. CONVEYANCE OF THESE LANDS IS ILLEGAL; TITLES PURPORTING TO TRANSFER SUCH LANDS ARE VOID. ASSENTS THAT INVOLVE THE FILLING OR USE OF THE STATES SUBMERGED LANDS ARE GRANTED WITH THE PROVISIO THAT IT IS SUBJECT TO THE IMPOSITION OF A USAGE FEE TO BE ESTABLISHED BY THE COASTAL RESOURCES MANAGEMENT COUNCIL.

### SPECIFIC STIPULATIONS OF APPROVAL

#### Stormwater Master Plan

1. Parcel development within the I-195 Redevelopment District (District) shall comply with Minimum Standard 6 for Redevelopment and Infill Projects (Section 3.2.6) of the Rhode Island Stormwater Design and Installation Standards Manual (RISDISM).
2. The stormwater treatment water quality volume (WQv) required for each of the twenty-one (21) individual parcels that comprise the District shall be as specified in Table 2 of the I-195 Redevelopment District Stormwater Master Plan (Stormwater Master Plan). The total water quality volume for the entire I-195 Redevelopment District is 1.02 acre-feet.
3. Applications shall be filed with the CRMC for each of the 21 District parcels to identify where and how the parcel(s) will achieve the required stormwater treatment WQv specified in Table 2 of the Stormwater Master Plan. Example stormwater treatment practices are shown in Figures 1 through 3 in Appendix H of the Stormwater Master Plan. Other practices may be used, but must comply with the requirements of the RISDISM. Each parcel shall provide stormwater treatment in whole or in part using onsite or offsite practices located within the District.
4. The I-195 Redevelopment District Commission (Commission) shall track parcel compliance with the stormwater treatment water quality volume (WQv) requirements for the entire District and provide an updated compliance spreadsheet with each parcel application filed with the CRMC. The spreadsheet shall provide a table-format summary identifying the parcel number, parcel size, total amount of impervious surface at build out, types of stormwater treatment practices and their location within the District. The spreadsheet should clearly identify how parcel

redevelopment is meeting the parcel and overall District WQv requirements as specified in Table 2 of the Stormwater Master Plan.

5. The owners of District parcels shall be responsible for the operation and maintenance of stormwater treatment facilities serving their respective properties regardless of the facility location. Applications filed with the CRMC shall include an Operation and Maintenance Plan in accordance with RISDISM Minimum Standard 11 (Section 3.2.11). The legal entity responsible for operation and maintenance shall be identified on individual permit applications.
6. RISDISM Minimum Standard 2 for Groundwater Recharge (Section 3.2.2) will be achieved when practicable and where site conditions allow. A pollutant loading analysis (PLA) as specified in Appendix H of the RISDISM will not be required.
7. If parcels abutting the District are merged with existing District parcels, as permissible under R.I.G.L. § 42-64.14, then they shall be subject to the CRMC Assent and stipulations for the Stormwater Master Plan. The Commission shall amend the Stormwater Master Plan for stormwater treatment water quality volume (WQv) and compliance tracking to document changes to the impervious surfaces that are built or will be built as part of a development proposal within the District. The Commission shall file the amended Stormwater Master Plan and amended compliance tracking spreadsheet with the CRMC for reference in subsequent applications.
8. The build out period for the 21 parcels within the District is expected to exceed seven (7) years and is considered by the CRMC to be a Large Scale Project. Accordingly, the CRMC Assent for the Stormwater Master Plan shall be valid for a period of ten (10) years. The Council may grant an Assent extension for the Stormwater Master Plan at the request of the Permittee for an additional ten (10) year period in accordance with CRMC Management Procedures Rule 5.12. The Permittee must file the Assent extension request with the CRMC 60 days prior to the expiration of the initial Assent.
9. Parcel development proposals within the District may be filed as CRMC Category A applications, provided a proposal does not involve an activity that triggers a Category B review as determined in Table 1 (Review Activities and Prohibited Activities in Tidal Waters and on Adjacent Shoreline Features) of the Coastal Resources Management Program. Should the CRMC determine that applications for parcels 1A, 2, 5, 14, P2 and P4 are Category A activities, then the applications will be processed within 60 days or less of a determination that the application is complete. Category A applications for all other District parcels will be processed by the CRMC within 30 days or less of a determination that the application is complete.
10. Applications filed with the CRMC for individual parcel redevelopment proposals shall include stormwater treatment compliance tracking provided by the Commission and verification that their specific proposed project is consistent with the Stormwater Master Plan.
11. CRMC Assents for redevelopment projects on individual parcels will be valid for a period of three (3) years, but may include one-year extensions as permissible in accordance with CRMC Management Procedures Rule 5.12.



## Metro Bay SAMP Urban Coastal Greenway Applications

12. Section 150.1 of the CRMC Metro Bay SAMP Urban Coastal Greenway (UCG) policy requires that 15% of a development parcel must include sustainably landscaped areas. These may include any landscaped or grassed areas, vegetative stormwater management elements, roof top gardens, etc. The aggregate 15% vegetative cover requirement for individual parcels subject to UCG requirements may be provided on the two planned park parcels, P2 and P4. Besides these two park parcels, the other parcels subject to the UCG requirements are 1A, 2, 5, and 14 with a total combined parcel area of 3.09 acres. The combined 15% vegetative cover area requirement for these four parcels is 0.46 acres. The combined area of Parcels P2 and P4 is 8.51 acres of which 4.2 acres will be vegetative cover. The total 15% vegetative cover requirements for Parcels P2 and P4 is 1.28 acres. Therefore, Parcels P2 and P4 can provide the required total combined vegetative cover requirement of 1.74 acres for all six parcels.
13. Individual applications for CRMC Category A Assent on Parcels 1A, 2, 5, 14, P2 and P4 will be subject to a 15-day public notice pursuant to CRMC Metro Bay SAMP UCG Rule 150.1. If the CRMC determines that proposed activities on parcels 1A, P2 or P4 are Category B review activities, then they will be subject to a 30-day public notice period. All other Category A applications for parcels within the District shall not require CRMC public notice.

## CRMC Application Procedures for I-195 Redevelopment District Parcels

14. The I-195 Redevelopment District Commission is a state entity pursuant to R.I.G.L § 42-64.14, and thus, CRMC permit application fees may be waived in accordance with the CRMC Management Procedures Rule 4.2(4) when the Commission files an application for property it owns.
15. Parcels P2 and P4 are planned open space parcels abutting the Providence River and are intended as public parks. In addition, Parcel 1A is an existing public park abutting the river along South Water Street that includes a boardwalk constructed under CRMC Assent 1998-06-055. These three parcels will be owned by the Commission for the foreseeable future, thus the CRMC application fee waiver may apply when the Commission proceeds with permit applications for improvement work on these three park parcels, including the proposed pedestrian bridge construction project that will span the Providence River and link Parcels P2 and P4.
16. CRMC application fees will be required for any construction activity on Parcels 2, 5, and 14, as they are on a coastal feature or within the 200-foot contiguous area and are planned to be developed by a private entity. CRMC application fees are specified in Management Procedures Rule 4.3 and are based on the estimated project cost. The 21 parcels that currently comprise the I-195 Redevelopment District have been identified by the Department of Environmental Management (DEM) in letters dated July 3 and October 8, 2013 as a Brownfield site pursuant to the DEM's Rules and Regulations for the Investigation and Remediation of Hazardous Material Releases. Accordingly, the application fee for Parcels 2, 5, and 14 will not be based on estimated project cost, but will be capped at \$5000 because they are DEM-confirmed Brownfield sites and meet the fee cap specified in CRMC Management Procedures Rule 4.3.2(r).

17. All other remaining parcels within the I-195 Redevelopment District will not have to submit a CRMC application fee when they file their Category A applications to verify conformance with the CRMC Stormwater Master Plan Assent.
18. The Commission, as the local permit granting authority, is responsible for verifying compliance with applicable City of Providence ordinances and building codes pursuant to R.I.G.L § 42-64.14. Thus, a letter from the Commission's Executive Director or Chairperson will serve as CRMC's application requirement for a local municipal approval of a proposed project within the District.

In Witness Whereof, said Coastal Resources Management Council have hereto set their hands and seal this            day of November in the year two-thousand-thirteen.

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Jeffrey M. Willis, Deputy Director  
Coastal Resources Management Council

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