

September 5, 2025

Diane Williamson, AICP, CFM
Director of Community Development
Town of Bristol
10 Court Street
Bristol, RI 02809

Re: **Preliminary Submission Plan**
 674 Metacom Avenue
 Owner: Lionel J. Ramos
 AP 128 Lot 15 & 16
 Pare Project No. 98166.00, Task 109

Dear Ms. Williamson:

Pare Corporation (Pare) has completed our review of the Preliminary Plan Submission for 668 & 670 Metacom Avenue received from Principe Company, Inc. The materials provided for review include:

- Preliminary Plan Submissions for 668 and 670 Metacom Avenue prepared by Principe Company, Inc dated August 8, 2025,
- Drainage Analysis prepared by Principe Company, Inc dated August 8, 2025,
- Response to Comments dated July 30, 2024,
- Trip Generation Statement prepared by Principe Company, Inc dated August 8, 2025, and
- Architectural Plans dated August 5, 2025.

Pare offers the following comments pertaining to these submissions:

Waivers Requested:

1. Land Development Projects Section: Sidewalks shall be required to be installed on one side of new street in subdivisions and multifamily developments. No sidewalks are proposed in front of Lot 15.

Response: The general consensus during the recent TRC (Technical Review Committee) meeting was that sidewalks would be pointless in front of Lot 15 (and in front of Lot 16, although one is proposed here) as they don't connect to anything and Lot 15 is not being developed.

Pare Response: Noted.

General:

1. Town of Bristol Zoning Ordinance §28-22 Table A states that a warehouse in a GB zone is only permitted upon approval of the zoning board with a special use permit. Confirm that this warehouse has a been approved by the zoning board.

Response: Applicant is proposing to construct a garage/warehouse structure to support the commercial services business currently in operation. Applicant is seeking modification of a legal nonconforming use and a preexisting condition on site and is subject to Unified Development Plan Review. Applicant has requested the appropriate relief regarding the proposed structure.

Pare Response: Noted.

2. The project requires submission to the Rhode Island Department of Environmental Management (RIDEM) for Freshwater Wetlands Review and RIPDES Authorization.

Response: A submission to RIDEM for both Wetlands and Stormwater was made on July 31, 2025.

Pare Response: A copy of the applications should be provided to the Town.

Plans:

1. The Town of Bristol Subdivision and Development Review Regulations Appendix E Section C require all sheets to include:
 - a. Notation of any permits and/or agreements obtained from or made with State and Federal agencies, including permit number if applicable.
 - b. Names and address of adjoining communities or agencies requiring notice under these regulations.

Response: Only a. is applicable and has been addressed on the plans.

Pare Response: Accepted.

2. The proposed building is identified as a “warehouse” and as a “garage.” Review and revise the plans to remove inconsistent terminology.

Response: Applicant is proposing to construct a garage/warehouse structure to support the commercial services business currently in operation. Applicant is seeking modification of a legal nonconforming use and a preexisting condition on site and is subject to Unified Development Plan Review. Applicant has requested the appropriate relief regarding the proposed structure.

Pare Response: Noted. The descriptions noted on the plans should match the use determined in the zoning relief.

A condition may be included prohibiting exterior vehicle service, maintenance, and equipment cleaning; auto fueling; and road salt storage and loading. These uses are considered land uses with higher potential pollutant loads, and would require implementation of additional stormwater management standards.

3. Perimeter sediment controls shall be proposed on all downstream areas of the proposed site. Review and revise plan accordingly.

Response: Perimeter sediment controls were/are shown at all areas downstream of the proposed work areas.

Pare Response: Accepted.

4. Existing Conditions-Lots 15 & 16: The Town of Bristol Subdivision and Development Review Regulations Appendix E Section C require the existing conditions plan to include:
 - a. Boundaries of applicable watersheds for the parcel(s)
 - b. Notation indicating that the development parcel(s) (or existing structures) are located or not located within the following areas of special concern:
 - i. Natural Heritage Areas, as defined by RIDEM
 - ii. The area(s) under the jurisdiction of any Special Area Management Plan (SAMP) of RI CRMC
 - iii. A Groundwater Protection Overlay District
 - iv. A Wellhead Protection Area
 - v. Groundwater Recharge Area
 - vi. Areas within a TMDL watershed, as identified by RIDEM
 - vii. OWTS Critical Resource Area, as defined by RIDEM
 - viii. A Drinking Water Supply Watershed, as defined by RIDEM
 - ix. National Register of Historic Places
 - x. Bristol Historic District
 - xi. Silver Creek Watershed in Town of Bristol
 - xii. Tanyard Brook Watershed in Town of Bristol

Response: Provided.

Pare Response: This lot is located in the Silver Creek Watershed. Revise plans to include a notation indicating that the development parcels are in this watershed.

5. Proposed Layout Plan-Lot 16: The Town of Bristol Subdivision and Development Review Regulations Appendix F Section F require that in commercial developments, there shall be at least one clearly designated pedestrian route between the street, the parking area and the main entrance of the building. Review and revise sidewalk.

Response: A sidewalk was initially shown in this location. However, subsequent conversations with the Town resulted in its removal, in order to move the building closer to the street and further away from the wetland areas. In addition, the business in this building is not intended for access from the general public and there are no sidewalks to this lot from any other parcels of land.

Pare Response: If a waiver is being requested, this section should be included in the list of waivers on the cover sheet.

6. Proposed Layout Plan-Lot 16: Town of Bristol Zoning Ordinance §28-251(4) requires all driveways to be a minimum of 12 feet in width for each lane of traffic using such driveway. Revise driveway to accommodate 2-way traffic.

Response: The two lots in question have a common access easement with half of the easement on one lot and half on the other lot. Therefore, one 12' paved access is shown on Lot 16 (the lot to be developed), and the existing access drive on Lot 15 is proposed to remain as is.

Pare Response: The easement appears to only describe access at the roadway. Access easements should be provided to meet the minimum lane widths for the entirety of the driveway length.

7. Proposed Layout Plan-Lot 16: Town of Bristol Zoning Ordinance §28-253(a)(1) requires a minimum of 1 loading space for buildings with a GFA between 3,000 – 19,999 SF. Review and revise plan to include a loading space.

Response: Loading will be done within the building.

Pare Response: Noted. Zoning relief may be required.

8. Construction Details-1: According to the RISDISM Chapter 5.5.3, pretreatment for bioretention systems should incorporate all of the following (unless a sediment forebay is provided):
 - a. grass filter strip below a level spreader or grass channel (using guidelines in Chapter Six),
 - b. pea gravel diaphragm (a small trench running along the edge of the practice), and
 - c. a mulch layer.

Review and confirm that the grass filter strip meets the guidelines from chapter 6 of the RISDISM. Additionally, review and revise the Bioretention Area Detail to include a mulch layer for pretreatment.

Response: A pea gravel diagram is shown on the plans, then there is a grass filter strip into the basin and then a mulch layer within the basin. This has been submitted to RIDEM for their review. If a sediment forebay is preferred by the review agency, then one can be incorporated.

Pare Response: Noted.

9. Construction Details-1: According to the RISDISM Chapter 5.5.4, bioretention soils shall consist of USDA loamy sand to sandy loam classification and meet the following gradation: sand 85-88%, silt 8-12%, clay 0-2%, and organic matter (in the form of leaf compost) 3-5%. Confirm that the existing HTM conforms to these specifications.

Response: This comment is confusing, as the existing HTM is not proposed to be utilized within the bioretention basin. As indicated in the detail, all HTM is to be removed and replaced with the required bioretention component, including an appropriate (non HTM) soil. To clarify further, the detail has been updated to indicate that *all HTM* below the basin shall be removed and replaced.

Pare Response: Accepted.

Stormwater Report:

1. The Town of Bristol Subdivision and Development Review Regulations Appendix F Section I (2) requires the drainage report to include a site locus map, a graphic depicting the site soils based on National Resources Conservation Service Soil Survey data, Floodplain information as indicated on the Town of Bristol Flood Insurance Rate Maps (FIRM). Revise the Drainage Report to provide the required information.

Response: An addendum with these additional items has been provided.

Pare Response: Accepted.

2. The Town of Bristol Subdivision and Development Review Regulations Appendix F Section I (2)(c) requires an estimate of the quantity of stormwater surface run-off presently flowing from the land proposed to be subdivided, and that which would be generated by the proposed subdivision calculated on the basis of the two (2), ten (10), twenty-five (25), and one-hundred (100) year frequency, 24 hour, Type III, rainfall events. Provide an estimate of the quantity of stormwater runoff in a two-year storm event.

Response: As both RIDEM and RIDOT do not require the 2-year storm and usually request that it not be included in the calculations submitted to them, an addendum with these additional items has been provided for the Town's use and review, only.

Pare Response: Accepted.

3. The Town of Bristol Subdivision and Development Review Regulations Appendix F Section M requires all O&M plans to include contact information for the party legally responsible for maintaining the proposed BMP's as well as proposed maintenance. Revise the O&M Plan to include the owner's contact information.

Response: At this Preliminary stage, the maintenance agreement is DRAFT that does not get completed and signed until construction is completed.

Pare Response: Noted.

4. NRCS Soil Survey data shows hydrologic soil group of "D" for most of the site. Review and update the hydrologic model accordingly.

Response: As the site has been developed/farmed/disturbed since at least the 1950s, and the test holes indicate human transported materials (HTM) are present, the "D" soil mapped by NRCS decades ago is not correct. A hydrologic soil group of "C" is therefore utilized.

Pare Response: Provide test pit logs confirming classification as Hydrologic Soil Group C.

5. Test pits should be completed within the best management practice area to determining infiltration rate and depth to estimated seasonal high water table.

Response: Test pits have been shown on the plan.

Pare Response: Noted. Submit the test pit logs corresponding to 'TH#1' and 'TH#2' as shown on the plans.

6. The proposed bioretention pond has a depth of only one foot and offers limited freeboard - approximately 3.5 inches during a 10-year storm event and 2 inches during a 100-year event. Due to the fact that the pond has a narrow berm and there is no flow diversion proposed, it is recommended that the pond be revised to provide additional freeboard.

Response: Freeboard depth is a preferred condition, not a requirement, and is usually a protective measure for downslope abutters, etc. In this instance, the downslope condition is a pond/wetland and therefore personal or property damage is not an issue. Further, trying to increase the depth of the system could result in increased side slopes, increased maintenance requirements and erosive flows. As this project has been submitted to RIDEM for their review, we have not revised the basin at this time.

Pare Response: Noted.

Trip Generation Statement:

1. A more conservative land use code shall be used to accurately represent the increase in traffic. Pare recommends utilizing ITE Land Use Code 180 – Specialty Trade Contractor, as it more accurately reflects the operational characteristics of the proposed building.

Response: Trip Generation letter has been updated per Pare's recommendation. It should also be noted that a submission to RIDOT for a PAP has been made, and therefore we will adhere to their specific trip generation requirements.

Pare Response: Accepted.

New Comments:

1. Descriptions should be provided for the landscape easements shown on the neighboring properties. If plantings are proposed in these locations, a landscaping plan should be provided.

The applicant should provide a formal response to address each comment.



Ms. Williamson, AICP, CFM

(7)

September 5, 2025

If you have any questions or require any additional information, please do not hesitate to contact me at 401-334-4100 or bsykes@parecorp.com.

Sincerely,

A handwritten signature in blue ink, appearing to read 'R. Sykes', with a horizontal line extending to the right.

Robert J. Sykes P.E.
Managing Engineer