

December 8, 2025

TOWN OF BRISTOL
COMMUNITY DEV.

2025 DEC -8 AM 10: 57

Members of the Bristol Planning Board
Town of Bristol
Town Hall
10 Court Street
Bristol, RI 02809

*RE: The proposed Gooding Avenue hotel is **not consistent** with Bristol's Comprehensive Plan*

Dear Members of the Bristol Planning Board,

It is my opinion that this proposed hotel development does not comply with the following:
Town of Bristol Subdivision and Development Review Regulations (Amended March 14, 2024).
Article 8.6 states that development must be consistent with Bristol's Comprehensive Plan.

Enclosed is a detailed and cited review of the Town's 2016 adopted 2017 Comprehensive Plan, highlighting inconsistencies regarding the proposed 80-room hotel. Also, included are assessments of the following: Open Space Plan 2008, Natural Hazard Mitigation Plan 2016, and Storm Water Management revised 2008, all of which are incorporated into the Comprehensive Plan. Additionally, an assessment of the recent 2024 Hazard Mitigation and Flood Management Plan is attached.

What is noted and shared among all these plans is the **importance of preserving and protecting wetlands and controlling flooding**. The 2024 Hazard Mitigation and Flood Management Plan ranks **flooding** as a **high level of concern/risk rank**. (HMP 2024, p. 23) The Comprehensive Plan defines goals, objectives, and policies to protect wetlands and to control flooding. Also, the Comprehensive Plan outlines policies to protect the Town's historical character and integrity.

The following synopsis of cited page sections of the Town's Comprehensive Plan show that the proposed development **is not consistent** with the Plan and **does not comply** with Article 8.6. Therefore, **this proposed hotel development must not be approved**.

- Protect ecologically sensitive areas (p.12)
- Increase, acquire and protect areas of Silver Creek Watershed (p.12)
- Acknowledge importance of wetlands (p.50)
- Wetlands prevent flooding (p.115)
- Low impact development throughout the Silver Creek Watershed (p.217)
- Maintain Bristol's Character and make sure new development does not adversely impact integrity of the Town (p.3)
- Protect Silver Creek Watersheds from pollution/degradation (p.191)
- Maintain basic land use patterns (Map 3)
- Preserve Wetlands (Map 3)
- Prevent development from increasing flood damage potential (p.229)
- Increase forest cover by 25% (p.8)
- Protect the character of existing neighborhoods (Map 3)
- Do not over tax sewer system (p.18)

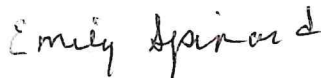
Members of the Bristol Planning Board
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- Residents desire to retain Bristol's small character (p.48)
- Promote tourism and businesses that complement the Town's environmental, scenic and historic resources (p.103)
- Map all significant wetlands that should be protected from new development, regardless of zone or ownership concerns. (p.218)
- Protect mapped wetland areas through zoning and other local regulatory means so that new or expanding construction in such areas is not permitted. (p.218)

It is my intention to speak at the Public Hearing regarding these inconsistencies.

Thank you for your consideration of my review comments.

Sincerely,



Emily Spinard
35 Dartmouth Street
Bristol, RI 02809

Attachments: (Detailed review comments of the Town's Plans):

Bristol Comprehensive Plan 2016 adopted 2017
Open Space Plan 2008
Natural Hazard Mitigation Plan 2016
Phase II Storm Water Management Plan revised 2008
(total pages 9)

Comprehensive Plan Maps (total 5):
Map 3 Central Planning Area and Land Use Objectives
Map 8 Historical District
Map 10 Wetlands and Flood Zones
Map 11 Soils
Map 12 Open Space

2024 Hazard Mitigation and Flood Management Plan (2 pages)

TOWN PLANS IN SUPPORT OF PRESERVING WETLANDS AND CONTROLLING FLOODING

I. Comprehensive Plan

Reference Document	Citation	Section	Reference Page
Comprehensive Plan 2016 Adopted January, 2017	It should provide the framework for all future private or public development projects. The Plan should encourage the asking and Answering of the following question: "How will this project or action affect the town in the long run."	Introduction (4)	viii
	E. Maintain the character of Bristol and make sure that new development does not adversely impact the integrity of the Town.	Ch. 1 Visions, Goals & Policies (land use)	3
	B. Acquire additional land for purely conservation purposes, to be left in its original pristine state and also to protect diminishing ecologically sensitive areas.	Ch. 1 Visions, Goals, & Policies (open space)	12
	D. Continue efforts to increase, acquire, and protect existing areas of the Silver Creek Watershed Area & Policies	Ch. 1 Visions, Goals, & Policies (open space)	12
	The community visioning process indicated that the residents of Bristol have a desire to retain Bristol's small town character and natural beauty. Part of the strategy to retain the Town's rural character is to implement conservation development techniques for future development. Conservation development is a design strategy to protect and preserve onsite and offsite natural resources from development impacts. As development sites are planned, topography,	Ch. 3 Land Use	48

TOWN PLANS IN SUPPORT OF PRESERVING WETLANDS AND CONTROLLING FLOODING

soils, vegetation, natural drainage patterns, and other sensitive or unique landscape features are considered as important resources deserving of protection and enhancement. Stormwater best management practices (BMPs) are also integrated into the development site, with the primary goal of protecting and restoring natural hydrology, preventing flooding, and protecting habitat and water quality

Another important land use consideration is the potential impact of a changing climate and the likely sea level rise associated with it. Rhode Island as a state has experienced a significant trend over the past 80 years toward a warmer and wetter climate region. Trends are evident in annual temperatures, annual precipitation, and the frequency of intense rainfall events. Inland, these trends have combined to produce an increase in river flooding. Some locations are experiencing more floods while other locations are seeing an increase in the severity of floods. This not only includes emphasis on more effective stormwater management, flood control and erosion management, but also acknowledgement of the importance of wetlands and floodplains as both habitat and scenic resources and necessary protection for vulnerable land.

Bristol’s natural resources include water, soils, vegetation and wildlife. Water resources including freshwater bodies, coastal waters and wetlands are important for the community.

Wetlands provide a value to prevent flooding, purify the groundwater, and as a wildlife habitat. Coastal waters are also important as residents enjoy swimming, boating, and fishing in the coastal waters of Bristol

Ch. 3 Land Use 50

Ch. 6 Natural, Cultural, & Historical Resources 115

TOWN PLANS IN SUPPORT OF PRESERVING WETLANDS AND CONTROLLING FLOODING

Protect the following critical areas in Bristol: Silver Creek and Tanyard Brook Watersheds.	Ch. 10 Implementation Matrix (LU-8)	187
Expand and implement the Silver Creek Watershed Drainage Study from the headwaters north of Gooding Avenue to the Mouth at Bristol Harbor.	Ch. 10 Implementation Matrix (LU-9)	188
The Central Corridor h) North Central: Maintain the land use pattern presently in place while allowing for only minor infill development. Do not allow the wetlands to be diminished or degraded. If the area is to be developed, guide such development in a manner that protects significant amounts of the area as open space while allowing for a mixture of uses and densities that make the open space protection economically feasible, such as through conservation development.	Ch. 10 Implement Matrix (LU-11 h)	190
Protect Silver Creek from pollution and degradation.	Ch. 10 Implement Matrix (LU-11 k)	191
Low Impact Development techniques should continue to be required throughout the Silver Creek watershed area.	Ch. 10 Implementation Matrix (NHCR-11)	217
Require best management practices to preserve wetlands, flood plains, and other environmentally sensitive areas in proposed land development projects.	Ch. 10 Implementation Matrix (OSCR-7)	227

TOWN PLANS IN SUPPORT OF PRESERVING WETLANDS AND CONTROLLING FLOODING

Continue to acquire additional acreage along the west and east branches of the Silver Creek watershed to add to the Town's greenbelt path system, protect sensitive wetlands and prevent development from increasing flood and storm damage potential.	Ch. 10 Implement Matrix (OSCR-19)	229
Establish priorities and continue to acquire land, rights-of-way, or easements along tributaries, estuaries, coastlines, and streams (for example Silver Creek) to buffer these areas from development and provide limited public access.	Ch. 10 Implement Matrix (NHCR-21)	220
Protect Silver Creek; Protect wetlands	Map 3 (land use)	
Map 11 shows the areas of eastern branch of Silver Creek watershed has seasonal high water table and hydric soil (severe constraints 0-18").	Map 11 (soils)	
Map 12 shows plat 111 lot 1 as private undeveloped land suitable for conservation and open space	Map 12	

II. Open Space Plan 2008

Reference Document	Citation	Section
Open Space Plan 2008	The goals of this committee are to advise the Town Council on open space preservation and acquisition efforts, act as a resource for other agencies with open space concerns, and advise the Planning Board on open space elements of the Comprehensive Plan. Committee members feel strongly that to be most effective, the committee must be both proactive discoverers of potential open space acquisitions, as well as reactive advisors to the Town.	Introduction 1
	Bristol's Comprehensive Plan places a strong emphasis on the preservation of open space and sensitive natural areas. The Comprehensive Plan also recognizes the need to protect ecologically sensitive areas, direct development away from flood prone areas, and provide greenbelts of open space as relief from development.	Introduction 1
	Silver Creek consists of two branches that originate in the north-central portion of town and flows southerly before meeting within a brackish tidal marsh that drains into Bristol Harbor. This waterway drains an area of approximately 1,500 acres, and is an important area for natural open space, wildlife habitat, and flood control. Flooding is a frequent problem in the Silver Creek watershed, most notably at the Chestnut Street and Hope Street Road crossings where flow is restricted.	Water Resources 5.3

TOWN PLANS IN SUPPORT OF PRESERVING WETLANDS AND CONTROLLING FLOODING

Several significant areas of freshwater wetlands can be found within Bristol. Most notable are wooded wetlands located within central portions of town along either branch of Silver Creek. Wetland resources such as those found in several area of Bristol help to control floodwaters by storing excess runoff during heavy periods of rain and snowmelt. Soils within the wetlands act as sponges and hold excess water until it can be slowly released into streams. Urban wetlands are particularly important because they help prevent flooded basements, roads, a recurring condition especially in the Silver Creek watershed.	5.3
Privately owned unprotected open space: owner Kendan LLC; plat 111/1, Gooding Avenue; 9.8 acres; woodlands, wetlands.	chart 14
Town owns parcels of open space adjacent to silver creek. Others are private and should be protected from development and encroachment into wetland. Open space acquisition efforts in this area should be focused on watershed protection, marshland habitat preservation and flood control.	7.1 (c)

III. Phase II Storm Water Management Program Plan revised 2008

Reference Document	Citation
Phase II Storm Water Management Plan	"The Storm Water Phase II Final Rule is the Environmental Protection Agency's Effort to preserve, protect, and improve the Nation's water resources from polluted Storm water runoff." 1.1
	Sub-Watershed 4A – is located in central Bristol. The sub-watershed area is approximately two square miles. Storm water from the sub-watershed drains to Silver Creek, which discharges into Bristol Harbor. 3.2 (drainage systems)

TOWN PLANS IN SUPPORT OF PRESERVING WETLANDS AND CONTROLLING FLOODING

"Town will review all plans for construction projects to ensure compliance with soil erosion and sedimentation controls and structural and non-structural BMP requirements.	4-27
Design of the development shall be consistent with the Comprehensive Plan.	Appendix F
	108

IV. Natural Hazard Mitigation Plan Update

Reference Document	Citation
Natural Hazard Mitigation 2016	Most respondents (to online survey) are 'Very Concerned' with flood related hazards (61.54%).
	Introduction
	Table 2-1
	According to Table 2-1 (Risk Assessment Matrix): there are vulnerable areas subject to flooding due to heavy rains and storms. These areas have historical and potential high risk, causing property damage and public safety and health concerns.
	1. Local roads: Bridge at Silver Creek, Chestnut, Gooding and conduits under St. Mary's Cemetery.
	2. Sewer Pump station at Silver Creek.
	3. Silver Creek and Tanyard Brook watersheds.
	4. Silver Creek Nursing Home
	Table 2-2
	According to Table 2-2 (Hazard Index) there is a high frequency of the natural hazard of inland/urban flooding/heavy rain. It shows damage as extensive and high hazard index of 7.

TOWN PLANS IN SUPPORT OF PRESERVING WETLANDS AND CONTROLLING FLOODING

Flood magnitude increases with increasing recurrence interval. The Town of Bristol can be uniformly affected by riverine/flash flooding events, dependent upon the location (amount of impervious surfaces within the area), existing/incoming weather conditions, and time of year (frozen ground conditions can exacerbate flooding) Based on the increased frequency and severity of flash flooding events (two significant events) which caused numerous business, road and bridge closures... the Town is considered at high risk for future flash flooding events.	Section 2	35
Development has exacerbated the magnitude and frequency of urban flooding by increasing impervious surfaces, also increasing the rate of drainage collection, reducing the carrying capacity of the land, and often overwhelming sewer system infrastructure.	Section 2	35
Silver Creek The area of Hope Street where the Silver Creek discharges into Bristol Harbor frequently floods during heavy rain storm events, particularly when combined with high tides. This area combined with the Tanyard Brook area, have traditionally experienced the highest damages from flooding throughout the Town.	Section 2	36
Just prior to the March 2010 floods, the Town slip-lined the existing drainage pipe that extended from the High School property on the north side of Chestnut Street through St. Mary's cemetery and to the outlet structure on the south side of the cemetery. The March 2010 floods sent so much water into this drainage system that the outlet structure "blew out" and caused significant erosion at the outfall. The Town was able to secure a grant (\$25, 000) from NRCS to re-grade the area and stabilize the banks with rip rap which replaced the destroyed outlet structure.	Section 2	36-37

TOWN PLANS IN SUPPORT OF PRESERVING WETLANDS AND CONTROLLING FLOODING

Given the size and geography of Bristol (as a peninsula), it is expected that all coastal areas, as well as the Silver Creek watershed are vulnerable to the impacts of sea level rise.	Section 2	45
Town Bridge (Route 114) at Silver Creek, which has been flooded in the past, now carries water and sewer lines that service the northwest portion of Bristol. The residents of Bristol, and all the commercial businesses in that area, are vulnerable to destruction of this bridge and the water and sewer lines that run underneath it. Breaks in the sewer line would not only leave residents without sewage disposal, but would also result in raw sewage discharge into Silver Creek. This section of Route 114 was closed during the March 2010 storm event.	Section2	64
The Comprehensive Plan is a planning document that outlines goals, policies, issues and actions to provide a framework for growth within the Town. In 2014, the Town adopted an updated Comprehensive Plan, which includes many of the mitigation actions included in the 2010 Hazard Mitigation Plan, still relevant for this 2015 Update. Moving forward, the Town will integrate new mitigation actions from this 2015 Update into the next update of the Comprehensive Plan. Land Use Element • *Action Item LU8 – Continue to protect the Silver Creek and Tanyard Brook Watersheds. *Action Item LU9 – Implement the Silver Creek Watershed Drainage Study.	Section 3	68
Guiteras School, Mt. Hope High School, Metacom Manor, Benjamin Church Manor, Silver Creek Manor, and Silver Creek Pump Station are major facilities at risk for flooding within the Eastern Branch of the Silver Creek Watershed.	Map A-3	

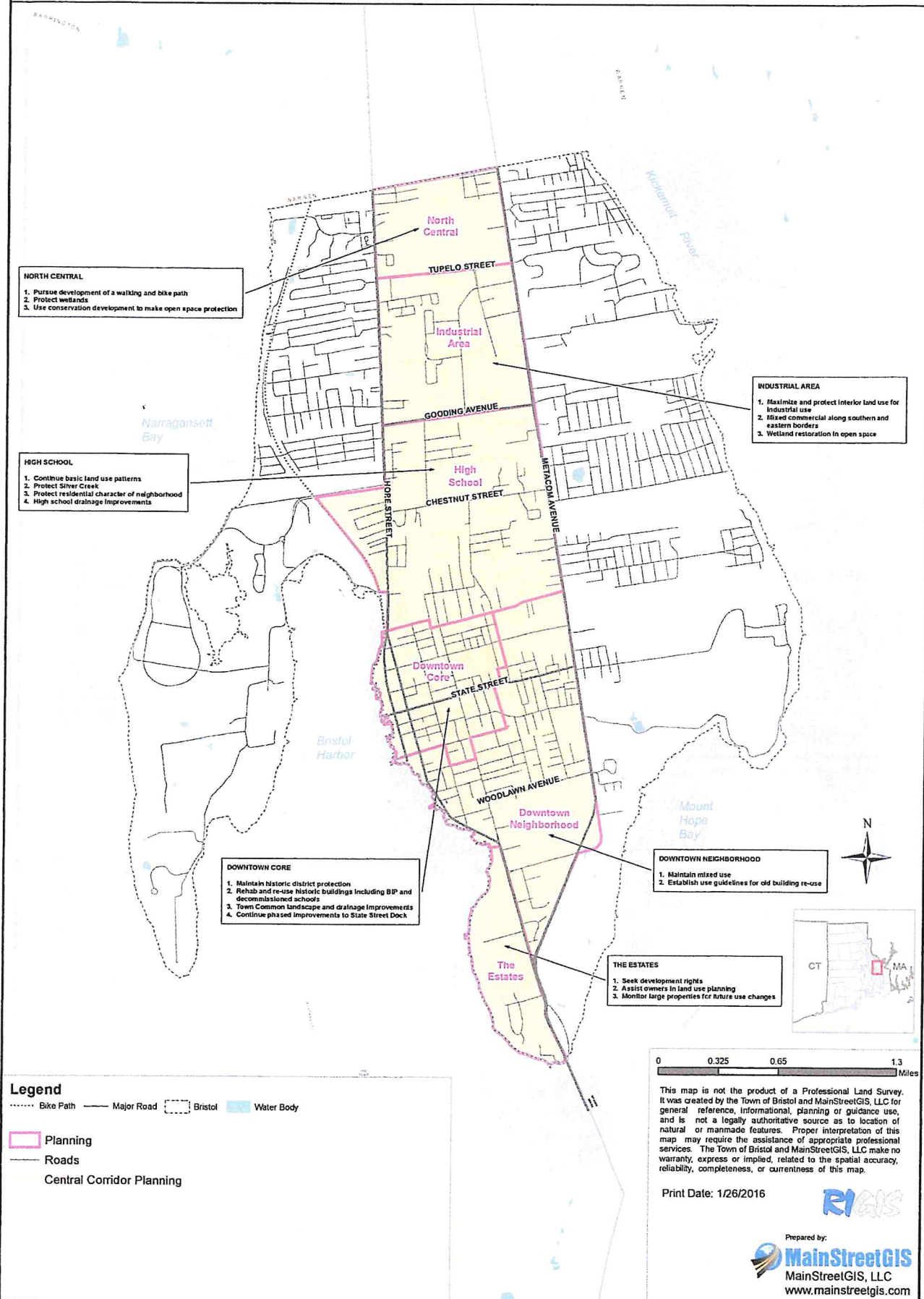


Town of Bristol

Rhode Island
Comprehensive Plan, 2016

MAP 3

Central Planning Areas and
Land Use Objectives



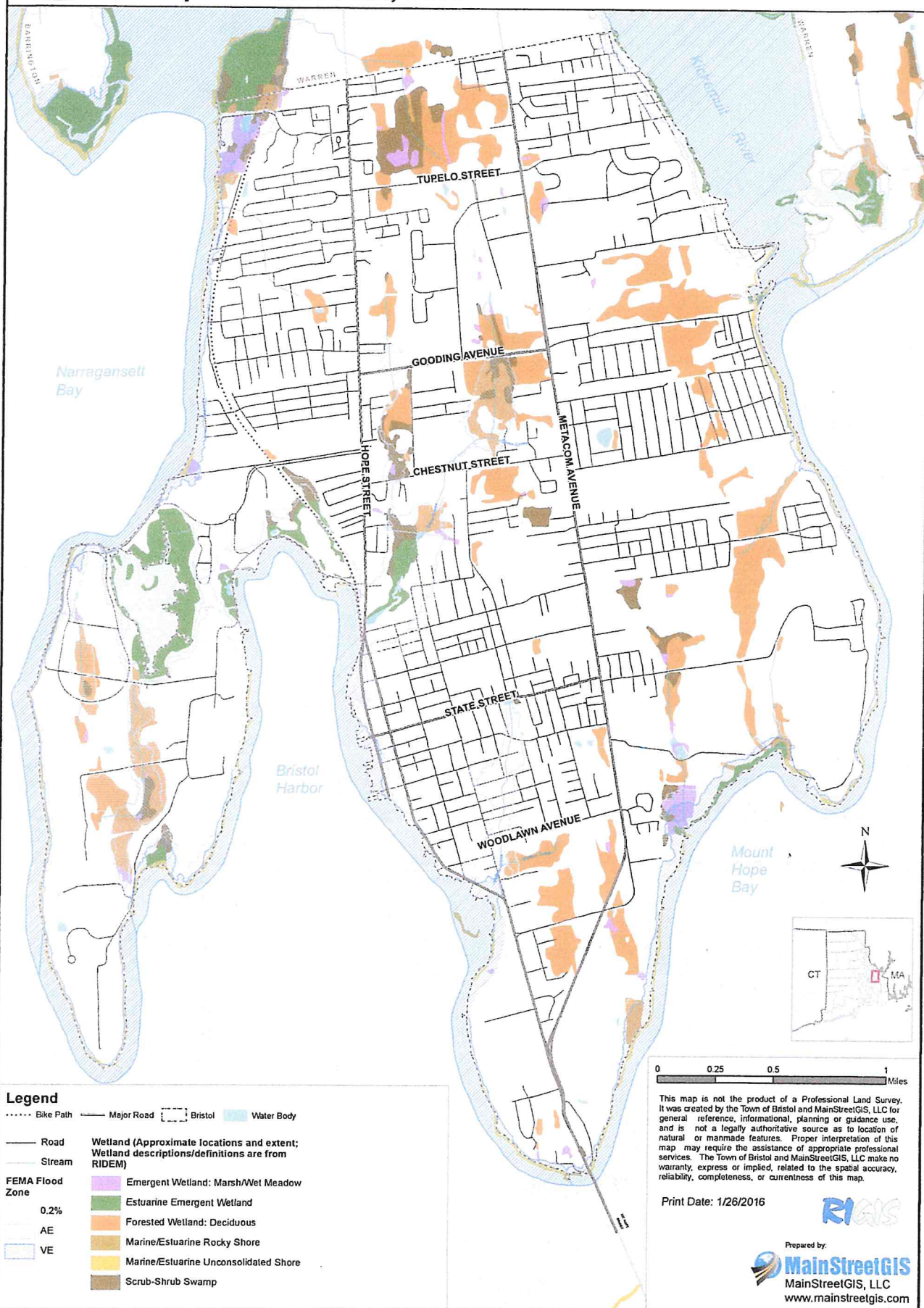


Town of Bristol

Rhode Island
Comprehensive Plan, 2016

MAP 10

Wetlands & Flood Zones



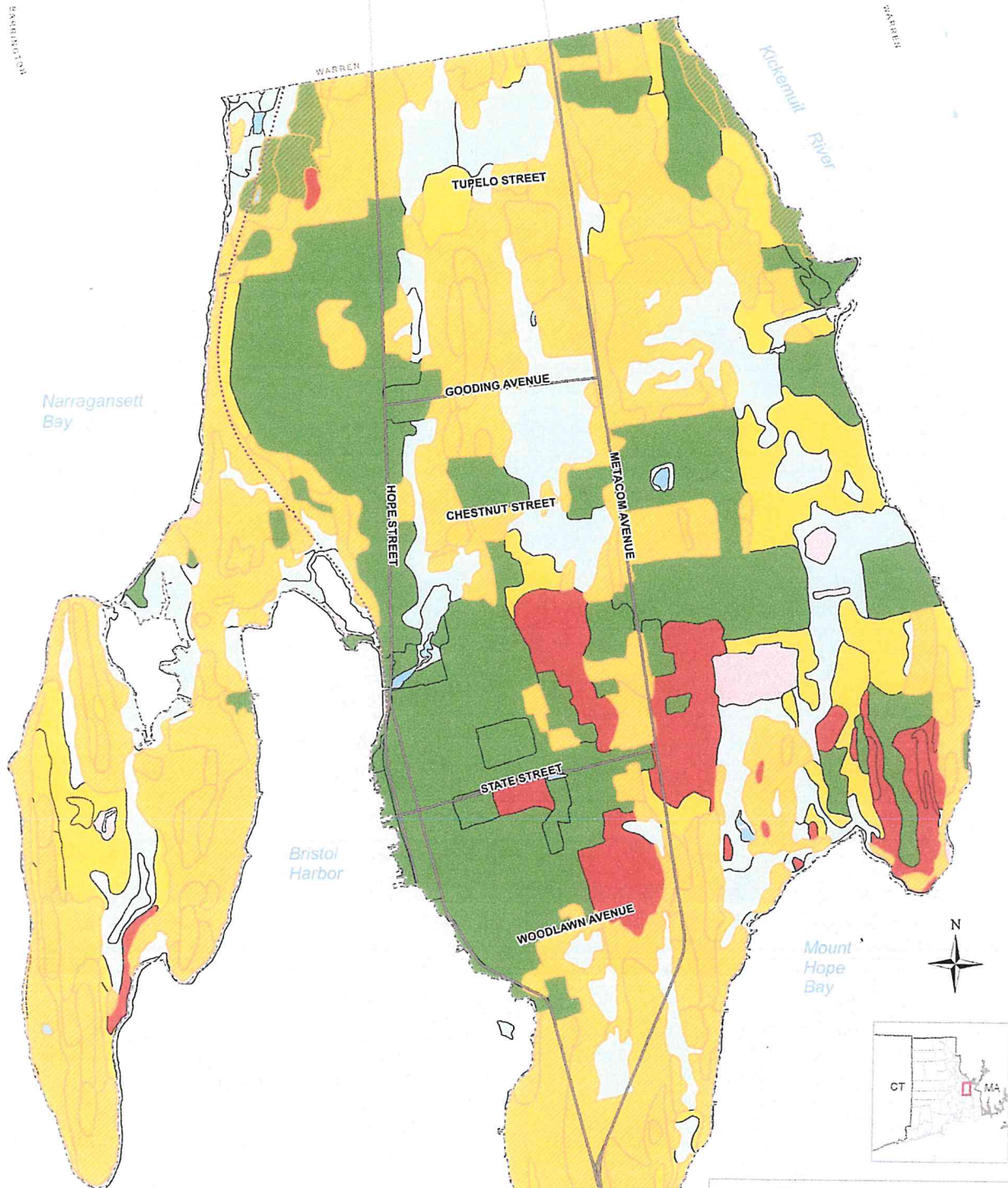


Town of Bristol

Rhode Island
Comprehensive Plan, 2016

MAP 11

Soils



Legend

..... Bike Path — Major Road [] Bristol [] Water Body

Prime Farmland Soils

RIGIS Soils 2014

ALL OTHERS - SEVERE CONSTRAINTS (ROCK, SAND, ETC.)

BEDROCK AND/OR SLOPE CONSTRAINTS (> 15% SLOPE)

HYDRIC SOILS - SEVERE CONSTRAINTS (0 - 18 IN. DEPTH)

MODERATE CONSTRAINTS TO DEVELOPMENT

SEASONAL HIGH WATERTABLE (19 - 42 IN. DEPTH)

0 0.25 0.5 1
Miles

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RIGIS

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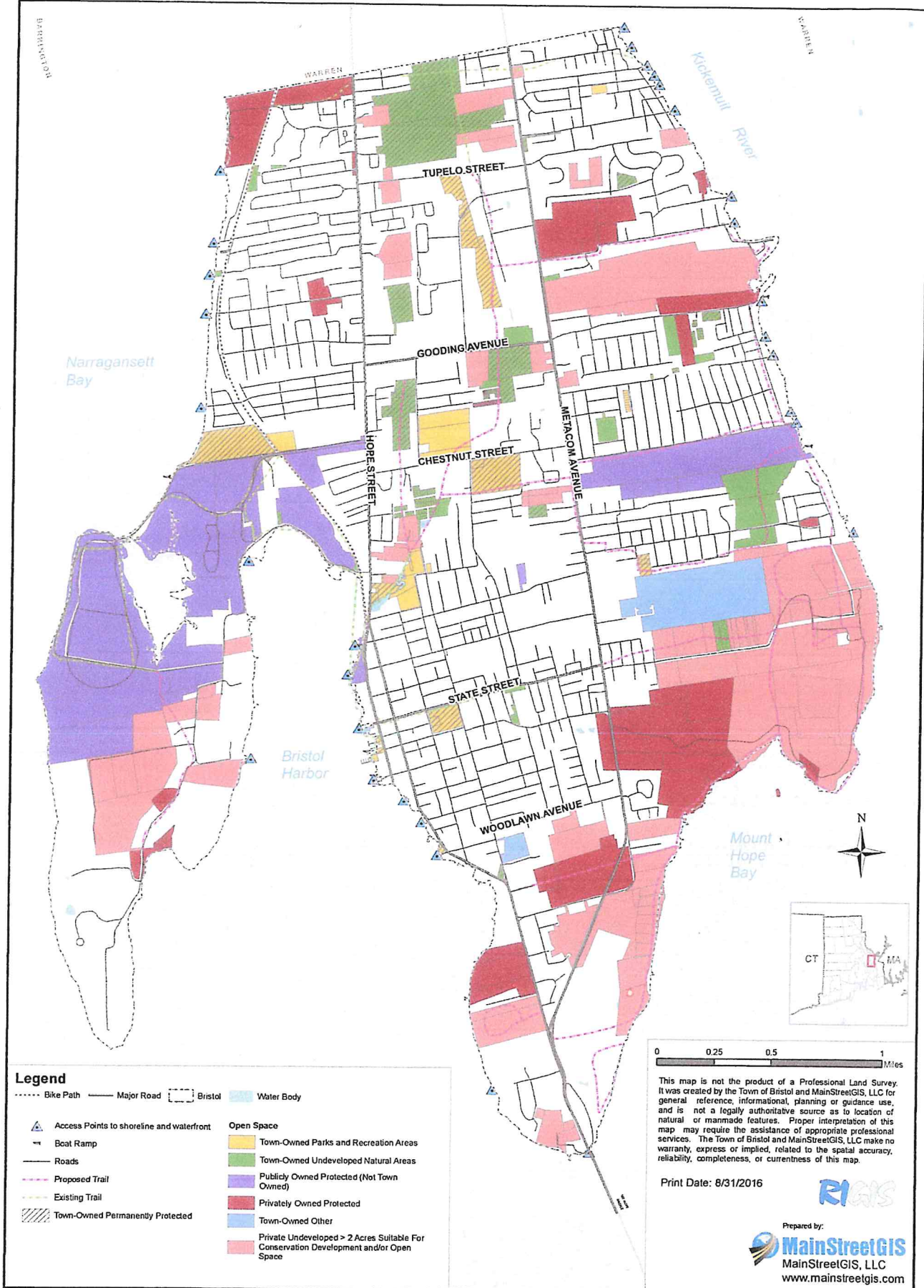


Town of Bristol

Rhode Island
Comprehensive Plan, 2016

MAP 12

Open Space, Conservation, Recreation,
and Other Undeveloped Properties



2024 Hazard Mitigation and Flood Management Plan Update



Town of Bristol, Rhode Island

Silver Creek and Bristol Harbor

Adopted by the Town of Bristol, Rhode Island on April 17, 2024

(The following citations are from the above referenced document.)

Water Resources (Bristol Hazard Mitigation Plan (HMP))

Water resources including freshwater bodies, coastal waters and wetlands are important for the community. Wetlands provide a value to prevent flooding, purify the groundwater, and as a wildlife habitat. (Introduction p.10)

The most significant natural water features in Bristol are the Kickemuit River, Narragansett Bay, Bristol Harbor, and Mount Hope Bay. They define the town's land boundaries to the east, west, and south. The second largest water resource is the series of streams that crisscross the town. Two of note are Silver Creek and Tanyard Brook which run through developed areas. (Introduction p.11)

The Bristol Hazard Mitigation (BHM) Committee identified and included all flooding (riverine, coastal, flash, and street) as a hazard. The BHM Committee ranked flooding as a level of high concern/risk in Bristol. (Ch 3 Natural Hazards pp. 20-23)

According to the Rhode Island 2019 Hazard Mitigation Plan Update, "Flooding is a localized hazard that is generally the result of excessive precipitation. Flooding is the most commonly occurring natural hazard, due to the widespread geographical distribution of river valleys and coastal areas, and the attraction of human settlements to these areas. Floods are among the most frequent and costly natural disasters in terms of human hardship and economic loss." (Ch 3 p. 32) Moreover, Bristol areas susceptible to flooding are the low-lying coastal zones, which are the most vulnerable, as well as the developed floodplain hazards of Bristol, which include the Bristol Waterfront Historic District, Poppasquash Road and Bristol Marine, Tanyard Brook and Silver Creek Watersheds. Furthermore, the probability of flooding is highly likely, expected multiple times a year. (Ch. 3 p.33)

The HMP cited the following critical natural resources identified in the Comprehensive Plan and Open Space Plan (p.65):

- *Wetlands and salt marshes*
- *Creeks and brooks*
- *Floodplains*
- *Soils*
- *Habitats and endangered species*
- *Wooded areas*
- *Beaches*

As cited in the HMP weather related events impact the natural environment. Additionally, the HMP states that flood frequency and flood severity have significantly increased over the past 80 years. Also, climate change will result in more heavy rains. It is therefore reasonable to conclude that the critical natural resources will be more severely impacted. When the natural environment is impacted, there are losses of habitats, salinization of land/groundwater, threats to ecosystems, and damage to built environment. (Ch. 4 Risk Assessment p. 65)

In Chapter 5 *Programmatic Capabilities* the HMP specifies aspects from the Town's existing relevant plans and policies that were reviewed in the writing of the HMP. The following relevant mitigation actions were noted. (Ch. 5, pp. 76-79)

Land Use Element (CP)

Action Item LU8: Continue to protect the Silver Creek and Tanyard Brook Watersheds

Action Item LU9: Expand and implement the Silver Creek Watershed Drainage Study from the headwaters north of Gooding Avenue to the mouth at Bristol Harbor and

complete the recommended Phase 2 Tanyard Brook improvements.

Open Space, Conservation, and Recreation Element

Action Item OSCR11 – Require Best Management Practices (BMPs) to preserve wetlands, flood plains, and other environmentally sensitive areas.

Bristol HMP has incorporated the Comprehensive Plan, Open Space Plan, and Bristol 2016 Hazard Mitigation Plan. And by doing so has strengthened the policies and guidelines of the dire need to protect the Town's sensitive undeveloped wetlands, floodplains, and watersheds from development to protect the Town and Bristol residents from increased flooding.