

December 8, 2025

2025 DEC -8 AM 10: 57

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

RE: Proposed Gooding Avenue Hotel
ENVIRONMENTAL IMPACT STUDY Comfort Inn and Suites

Dear Members of the Bristol Planning Board

The proposed 80-room, 3-story hotel would impact 1.9 acres of forest and wetlands next to Silver Creek's flood-prone watershed and a residential area, making it one of the town's largest private developments on undeveloped land. The EIS should fully address the significant impacts. Still, the submitted Comfort Inn and Suites EIS only briefly examines the affected environment and environmental consequences of the project. In my opinion, it does not meet the required level of analysis under Section A, Environmental, of the Bristol Subdivision and Development Review Regulations. The EIS:

- It is poorly organized with no consistency between the Sections Site Analysis (Affected Environment) and Impacts (Environmental Impact)
- It provides incomplete information in the Site Analysis (Affected Environment) Section
- It provides misleading and incorrect information in the Impact (Environmental Impact) Section, resulting in unsupported conclusions
- It fails to identify and explain the mitigation measures that should be considered
- It fails to identify the unavoidable consequences of the proposed development
- It concludes in the Impact Section for the Environmental Resources that "There will be no adverse impact to _____ as a result of this development."
- This is an incorrect statement as, by the very nature of the proposed development, it will harm the Environmental Resource, removing forest, filling in wetlands, destroying wildlife habitat, creating noise, lighting pollution, etc.
- The assessment is an identification of the level of the impact and whether that level is appropriate to the existing neighborhood and the Town.
- If the resource (Archaeological) being examined within the property limits of the proposed development does not occur on the property, then the statement: "There will be no adverse impact to _____ as a result of this development" is valid and can be included under Environmental Consequences in that assessment for that Resources

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- In several of the impact assessments on the Environmental Resources being examined, it makes the statement that “_____ will be provided at a preliminary plan stage.”
- The EIS is required as part of the Master Plan stage, and it needs to be complete and not put off to a later date
- It does not address the Construction Impacts of the proposed project
- It does not address Hazardous Materials
- It does not include a Phase I Hazardous Assessment

Attached is a detailed page-by-page review supporting the conclusion that this document does not meet the requirements of Section A, Environmental, of the Bristol Subdivision and Development Review Regulations. Thus, in my opinion, it should not be accepted by the Bristol Planning Board as fulfilling the requirements for an Environmental Impact Study.

General Purpose of an EIS

An EIS evaluates the potential environmental impacts of the proposed hotel and its operations and how they will affect the adjacent neighborhood and the Town. It informs the Planning Board and the public about potential environmental consequences of the project. Typically, an EIS includes: a project description with alternatives, a baseline profile of the existing environment, predictions of environmental impacts, and measures to avoid or minimize those effects.

Thank you for your attention to this request. If members of the Planning Board have any questions, I will be prepared to address their questions at the Public meeting.

Sincerely



Edward J. Spinard

Dartmouth St.

Attachment: Detail Review Comments (13 pages)

COMFORT INN AND SUITS
ENVIRONMENTAL IMPACT STUDY
REVIEW COMMENTS 12- 8-2025

Cover

- The title is incorrect should be Project Narrative and Environmental Study
- The photograph does not relate to the Project, more like a promotional photo for DiPrete Engineering

Table of Contents

- Site Analysis should identify all Environmental Resources examined in this Section (similar to the Impact Section)
- The Site Analysis Section (Affected Environment) should directly relate to the Impact Section (Environmental Impacts) 3, Affected Environment a) soils; 4.0 Environmental Impact a) Soils
- Appendix B) BETA Profile Figure is on page 20, not 19
- Should include a List of Figures and a List of Tables
- Appendix should be used to provide a complete listing of all references used in the EIS, including plans, reports, etc. with compete citations.

Page 3 – Executive Summary

- Should be Page 1, this is the first page of the EIS
- This is an Environmental Impact Study per Town regulation, not an Environmental Impact Statement
- Identify submission
- Identify Applicant
- The Executive Summary should provide a summary of Affected Resources examined, Environmental Impacts, Mitigation Measures considered, and Impact Results. A Table format could be used to present this information.

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2.0 Location

- Should read: There is approximately 506 **linear feet** of frontage on Gooding Avenue.
- Should include a zoning map
- This is a good place to identify alternative sites that could accommodate the hotel within the Town of Bristol.
- Should read: The development of the hotel is allowable under the General Business (GB) district of the Town of Bristol Zoning Ordinance (identify effective date)

3.0 Site Analysis

Soils

- All Sections should begin with an explanation of why the resource is being examined, including an identification of applicable Federal, State, Local Laws, Policies, Subdivision Regulations, and Performance Requirements
- The Soils Map by USDA Soil Conservation identified only Stissing (sf) soils
- The preparers have indicated that there are Pittstown soils in the project area.
- Provide a map showing the location of Tyson and Pittstown soils
- How were the location and identification of Pittstown soils determined
- Who identified the Pittstown soil locations, and what methods we use to make this identification
- When was the site analysis conducted to identify the soils
- When was the site analysis conducted to A to identify ground water levels and when
- How were the groundwater levels determined
- Were any observation wells placed within the project area
- Were the groundwater elevations observed during the wet season
- Show on a map the location of the groundwater elevations and depth to groundwater

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Agricultural Lands

- See Example included with the latter

Topography

- Explain why Topography is being examined
- Should reference Rhode Island Stormwater Design and Installation Standards Manual and LID (Low Impact Development)
- Provide a map/plan showing the topography of the project area.
- Statement "There are no areas that retain flood storage within the project area. All areas are drained to the wetlands on site".
- This statement is completely erroneous; the project area includes wetland areas that, as a functional value of wetlands, provide flood storage
- Also, the natural vegetation will absorb rainfall, reducing runoff, therefore reducing flood runoff into Silver Creek.
- This is why the applicant is required to prepare pre- and post-stormwater runoff rates
- Statements like this are not helpful to the evaluation by the Planning Board of environmental impacts resulting from the development.
- This statement shows a bias by the preparer in favor of the development of the hotel
- the preparer is supposed to present the facts and have the planning board determine their impacts, whether they are minor or significant

Structures

- Explain why Structures are being examined
- Provide a plan (aerial photo) showing structures
- Identify type of structure (commercial, residential)
- Identify size, height, and land coverage for each structure

Past and Present Use of the Site

- This section would be more appropriate as a discussion in the Location/Site Section

FEMA Floodplain

- This Section should be part of a discussion on Drainage and Flooding, which should be included in the Affected Environment.

Page 6

- This Section should be part of a discussion on Drainage and Flooding, which should be included in the Affected Environment.
- Show the project site on FEMA map
- Explain what may cause the flood elevation difference between Beta and FEMS, such as new rainfall amounts, more cross-sections in BETA producing better results, etc.
- The statement that: "The elevations do not impact the proposed development and as will be demonstrated in detail during the Preliminary Plan phase, the project will not increase downstream impacts from the existing floodplain."
- The statement should be included in the Environmental Impact Section
- The purpose of the EIS, as has been stated many times by the author of this review, is to provide an unbiased assessment at the time of its preparation, not to say or don't worry about this impact because we are going to study it at a later date.

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Existing Upland Vegetation (Forest)

- This Section should be titled Forest to be consistent with the Impact Section
- Why is the Forest an environmental resource
- Who performed the identification and when
- Reference source material
- Identify any unique vegetation and significant trees (Identify source)

Wetland and Hydric Soils

- Explain why wetlands are a resource, i.e they are protected by law because of their functional values
- Explain the functional values of wetlands
- Show a map of the different types of wetland and their location

- How were hydric soils identified, by whom, when, and what method was used

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Hydrology

- This Section should be part of a discussion on Drainage and Flooding, which should be added to the Affected Environment Description

Wildlife and Wildlife Habitat

- Explain why Wildlife is an environmental resource
- Identify source material and include a complete citation in the Appendix
- Explain how the DiPrete survey was conducted and by whom.
- Identify qualifications of person(s) conducting DiPrete's survey
- Provide notes on what was observed on the DiPrete survey, either through direct observation or signs
- Identify any Threatened or Endangered Species (identify source)

Need to add Sections to the Affected Environment to be consistent with the Impacts

Flooding and Drainage

- Identify applicable Federal, State, and Local Laws, regulations, and ordinances
- Add the Hydrology paragraph to this Section
- Prepare a Narrative on the Silver Creek watershed (project site within this watershed)(show map)
- Prepare a Narrative on existing stormwater drainage conditions (flow path, surface conditions) (show map/plan)
- Discuss Flooding (existing page 6)
- Discuss existing flooding problems associated with Silver Creek
- Identify downstream flooding areas: residential areas, new high school, St Mary's Cemetery, nursing homes)

Surface Water Quality, Streams and Rivers

- Identify applicable Federal, State, and Local Laws, regulations, and ordinances
- Identify the water quality of Silver Creek
- Identify the classic stream order, which is a "bottom up" hierarchy that allocates the number "1" to the river with its mouth at the sea (the main stem). Stream order is an important aspect of a drainage basin. It is defined as the measure of the position of a stream in the hierarchy of streams. Tributaries are given a number one greater than that of the river or stream into which they discharge. So, for example, all immediate tributaries of the main stem are given the number "2". Tributaries emptying into a "2" are given the number "3" and so on.[4]

Groundwater

- Identify applicable Federal, State, and Local Laws, regulations, and ordinances

- Identify and explain the groundwater quality classification
- Identify a private well within the area, including location, depth and its use
- Identify potential sources of groundwater contamination i.e, hazardous materials stored on site, accidental spills, metals and oils from the parking lot area, biological fluids from dumpsters, landscape maintenance chemicals, salting etc.

Noise

- Identify applicable Federal, State, and Local Laws, regulations, and ordinances
- Conduct existing sound monitoring program, identifying sound level along the project site property boundaries.
- Identify who conducted sound monitoring, qualifications and identify at what time and date it was conducted

Air Quality

- Identify applicable Federal, State, and Local Laws, regulations, and ordinances
- Identify existing air quality
- Is the area, project site in compliance with air quality standards

Historic/Archaeological Areas

- Identify applicable Federal, State, and Local Laws, regulations, and ordinances
- Explain why this environmental resource is being examined
- Provide a map (GIS online mapping) and a narrative explaining how these resources were examined

Traffic/Road Capacity

- Identify applicable Federal, State, and Local Laws, regulations, and ordinances
- Summarize existing traffic conditions from the *Traffic Impact Assessment*
- Provide a map/plan showing the existing Level of Service

Natural Heritage Sites

- Identify applicable Federal, State, and Local Laws, regulations, and ordinances
- A review of Natural Heritage Areas available at the RIDEM Map Room depicts a Natural Heritage Area (ID 101) occurring within the southern two-thirds of the property. A Natural Heritage Area request was submitted to RIDEM on April 7, 2025. The report indicates that the northern leopard frog (*Lithobates pipiens*) was observed east of Leila Jean Drive in 1985. This observation occurred beyond the subject property.
- The proposed project is not expected to impact this species. Northern leopard frogs typically utilize wetland habitats that contain slow-moving or still water along streams, wetlands with abundant emergent vegetation such as sedges and rushes, or permanent or temporary pools. The wetlands proposed to be altered by this project do not meet the habitat requirements for northern leopard frogs. (Explain and reference source) No individuals of this species were encountered during site visits performed by NRS or DiPrete Engineering.

Solid Waste Generation

- The project site is a forested and wetland area. There is no solid waste being generated from the site as it is currently not in any active use.

Coastal Resources and Features

- Describe Coastal Resources and Features
- Provide a map showing the closest Coastal Resources and Features to the project area

Utilities

Water Service

- Supply -Describe the source of water; capacity, current and future water use, available capacity
- Identify the location of the water main servicing the proposed development and its size
- Discuss that the hotel requires sprinklers for fire protection
- Estimate the water requirements for hotel occupants, kitchen, laundry, cleaning, and landscape maintenance
- Estimate the water requirements for fire protection
- Conduct a fire flow test to determine the quantity and pressure available from the existing water main and hydrants

Sanitary Sewer

- Treatment -Describe the wastewater treatment plant; its design capacity, current and projected wastewater quantities, and available capacity
- Estimate the wastewater requirements for hotel occupants, kitchen, laundry, and cleaning
- Describe the location and size of the sewer main to service the hotel
- Describe the pumping station that will service the hotel; current capacity and limitations

Page 8 and continue on Page 9

4. Impacts (Environmental Impacts)

This section needs to be completely redone. It is poorly written and organized; not consistent with the Affected Environment section; and is difficult to identify potential environmental impact from the proposed development and mitigation measures.

The purpose of this Section is to provide the Planning Board and the public with an indication of the likely environmental consequences of the proposed project. It identifies

potential effects of the project on the environment. It also identifies measures envisaged to avoid, prevent or reduce the effects on the environment (Add)

General Statement

- 1st paragraph beginning with “The submitted project propose.....” should be placed in the Freshwater Wetlands section
- 2nd paragraph beginning with “The project site consists “ should be placed in the Freshwater Wetlands section
- 3rd paragraph beginning with “The Town of Bristol regulations is appropriate for Impact discussion
- 4th paragraph beginning with “ The project will result in minimal impacts.....should be deleted. The Impact section will identify the environmental impacts on each resource. It is the responsibility of the Planning Board to examine the impacts and determine if they are minimal or significant. It is not within the scope of the preparers to make this determination. This paragraph clearly shows a bias on the preparers that is not within the scope of the EIS.
- 5th paragraph beginning with “The Master Plan Submissionshould be deleted. Each Resource Section should reference the applicable plans and reports that support the environmental analysis contained in the assessment
- Add a paragraph that explains the Impact section examines the environmental resources in the previous Affected Environment. The impact section identifies the environmental impact of the proposed development on the resource, identifies mitigation measures, and concludes with environmental consequences

Page 9 continue on Page 10

Freshwater Wetland

This is one of the major impacts of the proposed development. This section needs to identify the impacts to wetlands and the rationale for RIDEM to determine that the impacts did not result in a significant impact

- Organize Section: The impact section identifies the environmental impact of the proposed development on the resource, identifies mitigation measures, and concludes with environmental consequences
 - The first two paragraphs provide a good description of the environmental impact of the proposed development on freshwater wetlands
 - Reference Wetland Narrative Report submitted to RIDEM
 - Add a subparagraph Title: Mitigation Measures
 - Under Mitigation Measures include paragraph 3 beginning with “The alteration of these resource areas.....”
 - Under Mitigation Measures, discuss Stormwater Treatment
 - Add a subparagraph Title:
 - Under Environmental Consequences and include paragraph 4 beginning with “The approved wetland alter.....”

- Delete the remainder of the paragraph as it is subjective speculation
- Low quality history of disturbance; the sewer easement is not within the proposed hotel area; agricultural activity was last identified as occurring in 1938, how can you decide the area for the hotel was disturbed but the high value wetland to the East was not; how did the residential development disturb the hotel area wetlands?
- Should discuss wetland permit from RIDEM. As wetland areas will be lost due to the Hotel development, but RIDEM has made an evaluation that the wetland lost is acceptable.
- Explain RIDEM rationale for filling in wetlands
- The statement that the onsite wetlands do not provide stormwater runoff mitigation is wrong and should be deleted.
- This statement is completely erroneous, the project area includes wetland areas that as a functional value of wetlands, provide flood storage
- Also, the natural vegetation will absorb rainfall, reducing runoff therefore reducing flood runoff into Silver Creek.
- This is why the applicant is required to prepare pre and post stormwater runoff rates
- Last sentence: “There will be no adverse impact to freshwater wetlands as a result of this development. This should be deleted, and this section should identify the amount of wetlands that will be lost as a result of the hotel development

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c) Flooding and Drainage

This section needs to demonstrate the impacts on site drainage and downstream flooding in a comprehensive and objective assessment.

- Organize Section: The impact section identifies the environmental impact of the proposed development on the resource, identifies mitigation measures, and concludes with environmental consequences
- Delete the first sentence, this is a subjective judgment that needs to be fully examined
- Identify environmental impact, including loss of wetland areas that provide stormwater runoff and flood mitigation, and natural water quality treatment
- Identify mitigation measures by summarizing the Stormwater Report
- The Stormwater Management Report needs to be included as part of this EIS, and not “This Report will be provided for a detailed review by the town during the preliminary plan stage. Reference plans
- Discuss Silver Creek flooding problems
- Identify measures to mitigate downstream flooding by providing calculations and methods used to analyze downstream flooding impacts
- Delete last sentence: “There will be no adverse impacts to flooding and drainage on-site or off-site as a result of this development.” This is a subjective conclusion by the preparers.