



STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

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December 3, 2018

Ms. Jane Weidman, AICP
Town Planner
4540 South County Trail
Charlestown, RI 02813

Subject: Draft Comprehensive Plan Review - Natural Resources Chapter

Dear Ms. Weidman,

Statewide Planning greatly appreciates the opportunity to work with our municipal partners in the drafting of community comprehensive plans. We believe that the more closely we can work together, the better the ultimate product. We are pleased to notify you that our office has completed its review of the draft Natural Resources chapter of the Charlestown Comprehensive Plan.

As with other draft material you have provided to us, this chapter is clear and well-written. As one reviewer noted, "It was encouraging to read that the Town considers Natural Resources to be intimately linked to so many other elements of the plan." There were no items of concern that could be an impediment to State approval identified in this chapter. However, there were some suggestions provided during the review that we would like to forward for your consideration. In addition to the comments outlined below, we have included (as an attachment) comments and suggestions submitted to us by the Rhode Island Department of Environmental Management.

I would like to be clear that while the following are recommendations and are not required changes, inclusion of some or all of these recommendations would provide additional clarity and benefit the ability of the community to implement this chapter as Charlestown moves forward.

Comment 1: On page 7, paragraph 1, consider revising the third sentence as follows: "The Pawcatuck River and extensive inland wetland systems serve valuable functions in terms of providing flood storage, water quality maintenance, ~~and~~ wildlife habitat, and recreational ~~habitats~~ opportunities."

Comment 2: On page 7, paragraph 1, the sentence, “While not a rare habitat in the state, cedar swamps are unique, they provide diversity of habitat, and they are important overwintering areas for white-tailed deer,” is a bit misleading. Historically, it has been estimated that more than 78% of Atlantic white cedar swamps have been lost. Recommend deleting the phrase, “While not a rare habitat in the state”.

Comment 3: Page 8, Forested Lands, consider the following revision: “In addition to its habitat value, forests provide recreational opportunities such as hiking and hunting, and are important for a quality of life, and a healthy environment, and maintaining water quality.”

Comment 4: Page 9, the paragraph on Quonochontaug Pond states: “Two tributaries flow into the pond – Ninigret Cove Brook and Harmonic Brook...” However, although unnamed, it appears two smaller tributaries also enters the pond. Recommend revising the sentence to read: ““Two main tributaries flow into the pond...””

Comment 5: Page 10, Beaches, the fourth sentence in this section makes reference to the USFWS “so-called Mid-Atlantic Flyway.” Recommend removing the term “so-called” as it may be interpreted to mean that the name is an inappropriate descriptor.

Comment 6: Page 11, Natural Habitats, RIDEM would like to offer the following revision for clarity: “The natural resources of Charlestown represent some of the most significant habitat areas in the state. The RI Natural Heritage Program, a comprehensive inventory of the state’s most rare species and vulnerable natural features identified several areas within the Town of Charlestown that contain rare plant and animal species and represent unique habitat types. The data, now housed with the RI Natural History Survey, Initiated by RIDEM and The Nature Conservancy (TNC), the Rhode Island Natural Heritage Program (NHP) has kept an inventory of the state’s rarest and most vulnerable species and natural communities since 1979. Today, representatives from the Rhode Island Natural History Survey (RINHS), DEM, The Nature Conservancy, and the URI Environmental Data Center work together as a NHP consortium to maintain the inventory, which is also a community resource for management and stewardship needs, and identifying threats to critical areas.”

Comment 7: Please be advised that the Natural Heritage polygons depicted on Natural Heritage Areas Map NR-4 have been recently amended. The updates are minor and do not affect the overall analysis presented in this map, but the Town may wish to display the most up-to-date layer in the final plan.

Comment 8: Page 18, Frances C. Carter Memorial Preserve, consider revising the final sentence as follows: “The preserve joins several thousand acres of near-contiguous forest...” This adjustment is intended to reflect the fact that a rail line, powerline cut, and routes 91 and 312 transect the conserved land.

Comment 9: Page 24, Ecological Risks to Forested Lands, the first sentence states: “Forest greenway corridors provide the large territories needed by many species, and allow for the exchange of genetic material, but may also be aiding predation and introduction of invasive species.” RIDEM notes, “The benefits of having forested corridors to connect diverse forests likely outweigh any possible insect and/or pathogen “containment” benefit of having forested

patches isolated from each other as well as potential increased predation risk to species traveling through narrow corridors.” So as to avoid potential misunderstanding, RIDEM recommends that the statement about corridors aiding predation and invasive species either be deleted or revised to state that edge habitat and linear disturbances (e.g. from powerlines) to forests are the most common pathways for the introduction of invasive species.

Comment 10: The following comments, provided by RIDEM, are offered to help strengthen what is already a very good set of policies and actions.

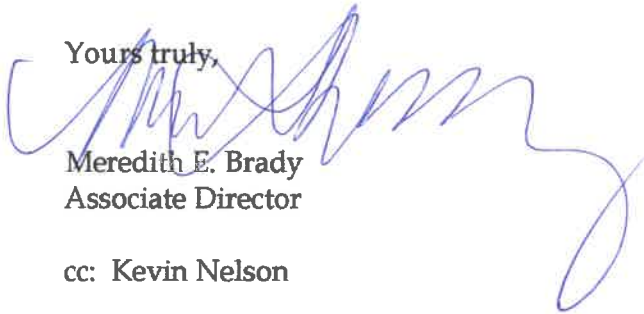
- Policy 1.1, Action 1: Recommend including the RI Wildlife Action Plan Conservation Opportunity Areas (COA) in the Town’s deliberations for assessing priority areas for protection. The Town may wish to add a COA map in this chapter. COAs are preferred to the Natural Heritage layer which is more limited in that it primarily is used for known locations of rare species.
- Policy 1.2, Action 3: RIDEM commends the Town as an early adopter of a Dark Sky ordinance but notes that the ordinance was written before the science began to gather information on the human and wildlife impacts of blue light. It would be timely for the Town to review this ordinance (and any public education program) to reflect this relatively new information/guidance. For example, the [International Dark-Sky Association](#) recommends using only as much light as necessary, keep it low and shielded, and minimize the amount of blue light emitted by keeping the Correlated Color Temperature below 3000 Kelvin.
- Policy 2.1, Action 1d: Recommend adding stormwater permits along with wetland permits since ground disturbance could require permits that may not have direct wetland impacts.
- Policy 2.1, Action 2d: Recommend the following: “Any other significant natural resource areas including the RI Wildlife Action Plan Conservation Opportunity Areas.”
- Policy 2.1, Action 3: This is a great idea and a good reminder to report any newly conserved parcels to DEM to record in its own GIS database. Please contact Paul Jordan (paul.jordan@dem.ri.gov) to register any additions to conserved lands in Charlestown.
- Policy 2.2, Action 1(e): Please note that private landowners and Indian tribes are also eligible for wetland restoration funding and technical assistance under the USDA-NRCS Wetlands Reserve Easements program. While lands must have a history of agriculture, salt hay (commonly harvested from many coastal wetlands) is considered a crop.
- Policy 2.3, Action 3(b): Recommend not limiting this action (educating homeowners on the proper use of fertilizers) to the salt ponds watershed unless resources limit scope of this initiative. This is an issue that is important statewide in freshwater as well as coastal watersheds.

Comment 11: Goal 1, Action 4, "Utilize transfer of development rights (TDR) to conserve land..." is misleading since the Town does not have a TDR ordinance. We recommend clarifying this action by revising it to read something along the lines of: "Upon adoption of a transfer of development rights (TDR) ordinance, utilize TDR to conserve land..." or "Adopt a transfer of development rights (TDR) ordinance to provide for the conservation of land..."

In this review, we have attempted to identify any issues regarding the material provided, but there are some items, such as requirements related to the plan's internal consistency and completeness, which cannot be evaluated until a full draft is furnished. At the appropriate time, we encourage the Town to provide us with the full final draft for review.

As always, please feel free to contact Kevin Nelson, Supervising Planner with any questions, concerns, or requests that you may have at 222-2093 or at kevin.nelson@doa.ri.gov.

Yours truly,



Meredith E. Brady
Associate Director

cc: Kevin Nelson