



RECORD OF DECISION

POCASSET RIVER FLOOD DAMAGE REDUCTION PROJECT

PROVIDENCE COUNTY, RHODE ISLAND

DECISION TO BE MADE

This Record of Decision (ROD) documents the decision by the United States Department of Agriculture Natural Resources Conservation Service (NRCS) to implement the Pocasset River Flood Damage Reduction Project in accordance with the Pocasset River Watershed Plan. This project is funded under the authority of the Watershed Protection and Flood Prevention Act, Public Law 83-566 (PL-566), and subject to the provisions of the National Environmental Policy Act (NEPA).

This ROD is issued pursuant to NEPA (42 U.S.C. §4321 et seq.), Council of Environmental Quality (CEQ) NEPA regulations (40 CFR Parts 1500-1508), and NRCS implementing regulations for compliance with NEPA (7 CFR Part 650, Subpart A and 7 CFR Part 622). The Pocasset River Watershed Plan is a combined planning document and Environmental Impact Statement (EIS) for the project. NRCS's decision to implement the Pocasset River Flood Damage Reduction Project is based upon the analysis in the Final Environmental Impact Statement (FEIS), which identified the Preferred Alternative as the least environmentally damaging alternative. NRCS published the Notice of Availability of the Draft Environmental Impact Statement (DEIS) in the Federal Register on June 28, 2019, for a 45-day comment period. NRCS's response to comments on the DEIS is included in Appendix A of the FEIS. The Notice of Availability of the FEIS was published in the Federal Register by NRCS on May 15, 2020.

INTRODUCTION

The Pocasset River watershed, located in the southeast corner of Providence County, Rhode Island, is highly urbanized. Increasing development has resulted in the severity and duration of flooding along portions of the Pocasset River in the Town of Johnston and City of Cranston becoming more frequent and widespread in the last 25 years. The major flooding-related problems include loss of property values, damage to residential, commercial, and industrial properties, increase in local government cost, and damage to roads and bridges. Other losses include decreases in potential sites for commercial and industrial development. Property damages are recurrent and costly where severe flooding occurs, with average annual damages exceeding \$3.2 million. A total of 481 residential/commercial properties (homes, apartment dwelling units, businesses) are impacted by flooding; 432 residential dwelling units (individual homes and apartments) and 49 commercial and industrial properties. Flooding of commercial and residential properties occurs whenever 10, 25, and 100-year rainstorm events occur within the watershed.

Previous floodplain studies have been conducted in parts of the Pocasset River watershed, but a comprehensive watershed analysis had not previously been performed. Upon receiving federal funding in 2001, NRCS started the Pocasset River Floodplain Management Study to provide solutions to the flooding and its associated damages. The Pocasset River Floodplain Management Study was completed in 2007 and released in 2008. The study provided the baseline for the technical work relied upon in this Watershed Plan/Environmental Impact Statement (Plan-EIS). It sets forth the current and future conditions related to flooding in the Pocasset River watershed. All hydrology, hydraulics, and watershed modeling were conducted in this phase of the project. As part of the study, damage reach maps were developed that provide a simple tool for property owners to determine if their property will flood and the frequency of each occurrence.



The purpose of the Pocasset River Flood Damage Reduction Project is to reduce damages within critical flooding areas along the Pocasset River in the Town of Johnston and City of Cranston for magnitudes up to and including the one-percent annual-chance (100-year recurrence) flood event while simultaneously protecting lives and property. The critical flooding areas identified by the Local Sponsoring Organizations (LSOs) include Rotary Drive, South Bennett Drive, and Simmons Brook Mill in the Town of Johnston, and Fletcher Avenue, Reservoir Avenue, Riverview Terrace, and Willowbrook Apartments in the City of Cranston. Proposed flood damage reduction measures include: the installation of sheet pile floodwalls along two sections of the Pocasset River totaling approximately 2,400 feet in length, including associated interior drainage infrastructure (pumping stations and detention ponds); the acquisition of approximately 140 properties located within the 100-year floodplain and demolition of structures located on the properties, totaling 134 structures; dry floodproofing 25 structures; installation of a bypass culvert along Simmons Brook; and removal of a debris dam at the confluence of Simmons Brook and the Pocasset River.

NRCS conducted a scoping process to identify concerns of the public, state and local governments, and federal, state, and local agencies, and to meet NEPA requirements for public participation. The first meetings between NRCS and the LSOs (the Town of Johnston and City of Cranston) to discuss funding through PL-556 for flood damage reduction in the Pocasset River watershed were held in 2000. In March 2005, the Pocasset River Steering Committee met to discuss flooding issues along the Pocasset River. The Committee consisted of residents, federal, state, and local elected officials and their representatives, and representatives from federal, state, and local agencies, including the U.S. Army Corps of Engineers, U.S. Environmental Protection Agency, Federal Emergency Management Agency, Rhode Island Department of Environmental Management, and Rhode Island Emergency Management Agency. The Committee also represented the interests of the public during development of the Plan-EIS. In addition to meeting with the Committee, NRCS has met individually with local officials, congressional staff, other regulatory agencies, and citizens whose homes and businesses have been affected by flooding in the Pocasset River watershed.

The Pocasset River Watershed Plan has been prepared by NRCS in accordance with Section 102(2)(c) of NEPA and its implementing regulations (40 CFR 1500-1508). The Plan documents the extent of the flooding problems, identifies potential/preferred measures, evaluates potential measures to alleviate property flooding, and assesses the environmental impact of the proposed flood control measures. NRCS published the notice of intent to prepare an EIS in the Federal Register on July 10, 2009. NRCS held a public meeting at the Cranston Senior Center on February 20, 2013, seeking public input on the Plan-EIS. After NRCS introduced the project, local citizens and government officials provided comments.

The Notice of Availability of the DEIS was published in the Federal Register by NRCS on June 28, 2019, and the FEIS on May 15, 2020. Three comments were received during the 45-day public comment period for the DEIS (see Public Involvement, below) and no comments have been received since publication of the FEIS. Since publication of the FEIS, NRCS has continued to work with the LSOs, congressional offices, and state and federal agencies to provide status updates and perform targeted public outreach leading up to project design and implementation. In accordance with the scope of action and analysis detailed in the Plan-EIS, Memorandums of Understanding (MOUs) between NRCS and the LSOs were developed, setting forth the terms and understanding to address flood mitigation in the Pocasset River watershed. The MOUs are intended to provide clarity on the responsibilities of each party and assurance of successful completion of the Pocasset River Flood Damage Reduction Project. The MOUs were signed by authorized officials from the Town of Johnston on July 15, 2022, the City of Cranston on September 1, 2022, and NRCS on September 15, 2022. Pursuant to Section 106 of the National Historic Preservation



Act, as amended, and its implementing regulations (36 CFR 800), NRCS formally reinitiated Section 106 consultation on September 25, 2023, to determine potential effects on historic properties as planned in the FEIS (see Consultations, below).

DESCRIPTION OF ALTERNATIVES

As part of the process to formulate project alternatives, NRCS worked with the Rhode Island Emergency Management Agency Floodplain Management Program and officials from the Town of Johnston and City of Cranston to identify sites affected by flood water damages and subsequent flooding impacts on human health and safety, economics, and surface water drainage. The goal of the plan formulation process was to maximize the reduction in average annual damages at the least cost. A cost-benefit analysis was done for each damage reach and project site to achieve the greatest benefits for the least cost. For planning purposes, alternatives were developed for each priority site.

All project planning and the evaluation of alternatives utilized the appropriate guidance manuals, including the NRCS Watershed Program Manual (NWPM) and Economic and Environmental Principles and Guidelines for Water and Related Land Resources Implementation Studies (P&G). The Plan-EIS is intended to ensure proper and consistent planning and design of flood damage reduction structures and measures, and the alternatives presented within were evaluated using the objectives and planning guidelines presented in P&G.

Alternative plans were formulated in a systematic manner to ensure that all reasonable alternatives were evaluated. In keeping with P&G requirements, plan formulation concentrated on alternatives which contribute to the federal water resource objective of National Economic Development (NED). In terms of federal assistance, the most important alternative is that plan which maximizes NED benefits, in this case flood damage reduction. All reasonable alternatives were formulated in consideration of the following four criteria: completeness, effectiveness, efficiency, and acceptability. These criteria are detailed in Section 5.1 of the FEIS.

Potential flood damage reduction options were analyzed at each site for feasibility and effectiveness in meeting the project goals. Section 5.1.1 of the FEIS evaluates the feasible alternative measures, including acquisition of properties, dry floodproofing, construction of floodwalls, and removal of physical constraints (i.e., construction of a bypass culvert and removal of a debris dam). A variety of alternative measures were also evaluated and determined not to be feasible within the project sites, including construction of a floodway, wetland restoration/creation, dam rehabilitation, sediment removal/channel dredging, bridge removal, elevating structures, and constructing earthen berm dikes. Table 5-1 in the FEIS provides a cost comparison of the feasible alternative measures.

The Plan-EIS includes both a No Action Alternative and a Preferred Alternative. The Preferred Alternative is the combination of preferred measures for each project site. The Preferred Alternative and the No Action Alternative are evaluated in Section 5.2 of the FEIS for each project site. The identified alternatives address the objectives of the LSOs and satisfy the requirements of P&G. A matrix (Table 8-4 in the FEIS) was developed to provide a concise comparison in narrative form of the Preferred Alternative to the No Action Alternative, with respect to certain economic, social, and environmental factors identified in scoping. The descriptions below provide a summary of the No Action Alternative and the Preferred Alternative, including flood damage reduction measures to be implemented. For a comparison of the alternatives, refer to Table 6-4: Summary and Comparison of Alternative Plans at the end of Section 6 of the FEIS.



No Action Alternative

The No Action Alternative is included in accordance with NEPA requirements and provides a baseline of comparison to the proposed actions to determine the relative merits and disadvantages of the alternatives considered. Several properties and structures are located on the fringe of the 100-year floodplain extents and are identified as being within a "Caution Area". Although no structural mitigation measures are proposed for these structures, the local flood evacuation procedures should be used to reduce the flood mitigation damage to properties and human life during large flood events. The No Action Alternative does not meet the project goals of reducing flooding and the associated economic and social impacts. Under the No Action Alternative, the project areas would remain in their current condition and no flood damage reduction mitigation would be provided. Property damages would continue to occur during flooding episodes.

Preferred Alternative

The Preferred Alternative includes the most cost-effective combination of feasible flood mitigation measures to meet the objective of flood damage reduction. The Preferred Alternative is described in detail in Section 8 of the FEIS. The Preferred Alternative includes various non-structural measures (property acquisition and dry floodproofing), removal of a debris dam, and construction of a by-pass culvert and floodwalls at Reservoir Avenue and Willowbrook Apartments. The floodwalls at each of the proposed locations would be engineered to provide flood protection during a 100-year, 24-hour storm event at full build-out. FEMA guidelines require that three feet of freeboard be included in the floodwall design as a safety measure. All the proposed floodwall designs shall incorporate FEMA guidance and requirements. A total of twenty-five (25) buildings, 16 in Johnston and 9 in Cranston, which are predicted to have flood elevations between 0 and 3 feet above ground surface will be dry floodproofed using standard NRCS procedures.

ENVIRONMENTALLY PREFERABLE ALTERNATIVE

The environmentally preferable alternative, as required by 40 CFR 1505.2(b), is "the alternative that causes the least damage to the biological and physical environment and best protects, preserves, and enhances historical, cultural, and natural resources" (43 CFR § 46.30). The environmentally preferable alternative is ordinarily identified by weighing long-term environmental impacts against short-term impacts in evaluating what is the best protection of these resources.

The Preferred Alternative is the least environmentally damaging alternative for providing one-percent annual-chance (100-year recurrence) flood damage protection. There are no known areas of controversy. The State of Rhode Island and the LSOs collectively support the project. The Preferred Alternative will result in the net restoration of approximately 38.5 acres of floodplain. The two proposed floodwalls will result in a loss of 9.5 acres, and the acquisition and demolition of structures throughout the watershed will result in 48 acres of restored floodplain area.

The loss of the 9.5 acres of active floodplain is a result of the construction of two floodwalls, which will limit the lateral extent of flood flows. Compensatory flood storage will be provided on a volumetric basis to mitigate the lost storage along the Pocasset River. This compensatory storage may be located at the other sites where land will be required as part of the Preferred Alternative. Floodwalls will protect adjacent residential, industrial, and commercial properties from damages caused by flooding. The Preferred Alternative will protect life and property along the Pocasset River by remedying flooding in high hazard areas.



Urban quality of the project area will be enhanced by the Preferred Alternative through flood protection for residential, commercial, and industrial areas through the acquisition and demolition of certain structures, as well as the relocation of residents and businesses outside of the floodplain. There are several beneficial impacts, including providing restored floodplain areas, which have beneficial environmental and community impacts. Property acquisitions may also allow for the LSOs to create public spaces that allow neighborhoods to better connect to the river.

The primary objective of the project is flood damage reduction in high hazard areas of the Pocasset River watershed. The Preferred Alternative reduces flood damages for the 100-year, 24-hour storm by close to 100% in these areas. The annual equivalent damage reduction is approximately 97%. Table 8-3 in the FEIS provides a breakdown of flood damage reduction effects of the Preferred Alternative. Project forecasting was based on local planning documents (zoning maps, comprehensive plans, etc.) and anticipated conditions within the watershed. As much of the watershed is currently developed, forecasted conditions (as applied in the future build-out watershed hydrology model) assume development will continue in accordance with the comprehensive plans of the LSOs.

In addition to the impacts described above, construction of the Preferred Alternative may have short-term, minor adverse effects on surface water quality, vegetation, soils, wildlife, noise, and traffic in the vicinity of the construction, as well as potential beneficial temporary impacts to the local economy through the creation of temporary construction jobs. During the construction phase of the project, best management practices would be used to minimize short-term, temporary environmental impacts.

DECISION AND RATIONALE

NRCS's decision regarding the Pocasset River Flood Damage Reduction Project is to implement the Preferred Alternative, which meets the planning criteria and is selected over the No Action Alternative. The project purpose is flood damage reduction, which is met by the Preferred Alternative. The Preferred Alternative calls for the elimination of all flood damages in the Pocasset River 100-year floodplain, except for insignificant minor damages along Reservoir Avenue. The No Action Alternative does not meet the project purpose.

P&G also states that the alternative with the greatest net economic benefit consistent with protecting the nation's environment is to be selected as the Preferred Alternative. Included in the Preferred Alternative is the statutory requirement of the LSOs that flood protection be offered to all occupants in the 1-percent chance floodplain, with acceptance of this offer being on a purely voluntary basis. This is accomplished in the Preferred Alternative. In summary, the Preferred Alternative will consist of the construction of sheet pile floodwalls along two sections of the Pocasset River totaling approximately 2,400 feet in length; the acquisition and demolition of approximately 140 properties located within the 100-year floodplain; dry floodproofing 25 structures; construction of a bypass culvert along Simmons Brook; and removal of a debris dam at the confluence of Simmons Brook and the Pocasset River.

In each high hazard area, the Preferred Alternative involves a combination of feasible measures to minimize cost while meeting the project goal of flood protection. The site rankings for each flood damage reduction measure, along with the rationale for the ranking system used, are displayed in Table 8-3 of the FEIS. The proposed action for each project site was developed by first analyzing each flood damage reduction measure for physical feasibility (the measure could be constructed, and if constructed would control flooding). If an alternative did not provide safe egress from the structure, then it was considered not feasible. If a flood protection measure was deemed feasible for a given site, it was given a ranking from 0 to 3 (with 3 being the highest) in three categories of equal weight:



1. Economic (project costs, including consideration of the costs for damages under the No Action Alternative)
2. Social (considerations include human health and safety during flood events, low-income resident displacement, property value changes, and land use impacts)
3. Environmental (floodplain and habitat impacts)

The three categories were then summed, and the highest-ranking measure was chosen to include in the Preferred Alternative at each site. Several sites include a combination of measures based on the lowest feasible cost to meet the same objective. For example, dry floodproofing is proposed along with acquisitions for properties with less than 3 feet of flood water under the 100-year flood event.

CONSULTATIONS

Consultations are presented in Section 7 and the Appendices of the FEIS. Below is a summary of consultations that occurred during the planning process and since publication of the FEIS:

March 2002 – NRCS contacts the Rhode Island Historical Preservation and Heritage Commission (RIHPHC) and Narragansett Indian Tribe for information on historic structures/cultural concerns in the project area. No structures or concerns were identified at that time.

April 2002 – U.S. Fish and Wildlife (USFWS) and the Rhode Island Department of Environmental Management are contacted by NRCS to determine if any National or State endangered or threatened species, or their habitats, are located within the project area. None are identified.

October 2005 – The Rhode Island Department of Environmental Management is again contacted to determine if any National or State endangered or threatened species, or their habitats, are located within the project area. None are identified.

September 2023 – NRCS formally reinitiates Section 106 consultation to determine potential effects on historic properties as planned in the FEIS. RIHPHC concurred with the proposed Area of Potential Effect (APE) on October 4, 2023. NRCS surveyed all the properties within the APE that are 45 years and older, evaluated the properties for listing in the National Register, and analyzed the effects of the undertaking upon the identified historic properties. NRCS recommends the former Cranston Chain Co. Factory is eligible for listing in the National Register of Historic Places and proposes to continue consultation to minimize any adverse effects. NRCS recommends 141 other buildings and structures are not eligible for listing in the National Register due to a loss of integrity or a lack of significance. NRCS also identifies St. Rocco's Church & School, James F. Simmons House, the British Hosiery Mill, multiple buildings on Morgan Avenue in Johnston, Pocasset Mill Workers' Housing, St. Brigid Roman Catholic Church, and the Thornton School as potentially eligible for listing in the National Register. NRCS determines the Thornton Bridge and British Hosiery Mill may be affected and proposes to continue consultation as design plans are developed. NRCS determines the undertaking will have either no effect or no adverse effect on the remaining historic properties within the APE. RIHPHC concurs with the NRCS findings, determinations, and approach moving forward on April 3, 2024.

May 2024 – USFWS is contacted by NRCS to reinitiate consultation for the northern long-eared bat (NLEB) as the listing status changed on November 29, 2022, when USFWS published a final rule to reclassify NLEB as endangered under the Endangered Species Act. USFWS advises NRCS to request a new species list for the project, and if NLEB is on the requested species list to consult through the Information for Planning and Consultation (IPaC) tool and use the Interim Consultation Framework if a



may affect determination is indicated. The species list includes NLEB, tricolored bat (proposed), and monarch butterfly (candidate). NRCS submits the NLEB consultation through the Rangewide Determination Key in IPaC which resulted in a no effect determination.

MITIGATION MEASURES

NEPA requires that significant impacts on the socioeconomic and natural environment from proposed federal actions need to be mitigated. Specific mitigation measures will be detailed during the permitting phase of the project, but preliminary measures and strategies are outlined below.

Construction of the various flood control structures, particularly the floodwalls, have the potential to temporarily impact the surrounding environment. The following measures will be undertaken to minimize impacts:

Notify affected property owners of the construction activity scope and duration prior to construction.

Limit construction to normal working hours as defined by ordinances in the Town of Johnston and City of Cranston.

Implement erosion and sedimentation control measures during construction to ensure that the river and adjacent wetlands are unaffected. This will be done by preparing a Stormwater Pollution Prevention Plan (SWPPP) as required by the National Pollutant Discharge Elimination System (NPDES) Construction General Permit (CGP).

Conduct a pre-construction survey of structures in the project area that could be impacted by the vibrations of sheet pile driving. Monitor vibration during construction if needed.

Work with the communities and property owners in/near construction areas to minimize and mitigate temporary impacts to parking.

Provide relocation assistance to affected property owners as required. Relocations will be accomplished by LSOs under the guidelines established in the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (PL 91-646). Relocation payments cover incidental costs associated with relocations (i.e., moving costs, etc.).

Provide aesthetically compatible floodwall construction in residential and historic areas of the project.

OPERATION AND MAINTENANCE

The operation and maintenance of nonstructural measures are the responsibility of individual property owners, while operation and maintenance of the structural measures are the responsibility of the LSOs. Open space areas have associated maintenance for mowing and potential trash cleanup. The estimated annualized cost of operation and maintenance is shown in Table 8-12 of the FEIS.

An operation and maintenance agreement between NRCS and the LSOs will be executed prior to the signing of a land rights, relocation, or project agreement. The term of the operation and maintenance agreement will be 50 years, based on the combined projected project lifespan and installation period. A typical operation and maintenance agreement used by NRCS is provided in Appendix B of the FEIS. The agreement will contain a reference to the NRCS National Operation and Maintenance Manual. An operation and maintenance (O&M) plan will be prepared for each separate plan measure in accordance with the guidelines in the manual. The O&M plan will specify the responsibilities of the LSOs, including, but not limited to, the following:



Periodic inspection of constructed flood control measures.

Repair of fencing, riprap, and/or vegetated areas.

Mowing of drainage swales and detention basins.

Inspection and maintenance of flap or motorized gates.

Testing of pumps and generators.

Cleaning of catch basins and detention basins.

Installation of closures.

Training of people responsible for operation and maintenance.

The LSOs will make inspections annually, after unusually severe floods, and after the occurrence of any other conditions that might adversely affect the plan measures to determine what maintenance is needed. These inspections will continue annually for the life of the project. NRCS may assist the LSOs with the inspections at the discretion of the State Conservationist. The LSOs will prepare an inspection report and send a copy to NRCS annually.

PUBLIC INVOLVEMENT

I certify that the agency has considered all the alternatives, information, analyses, and objections submitted by State, Tribal, and local governments, and public commenters for consideration by the lead and cooperating agencies in developing the environmental impact statement.

The public involvement process is presented in Section 7 of the FEIS, and documents meetings, public participation, and milestones which have taken place during the planning process.

Comments were also solicited through publication of the Notice of Availability of the DEIS in the Federal Register by NRCS on June 28, 2019. Below is a summary of comments received during a 45-day comment period:

August 1, 2019 – Response received from the Rhode Island Coastal Resources Management Council (CRMC) on August 1, 2019. CRMC advised the requirement for a federal consistency determination once the project design is developed to a point where facility development plans, engineering drawings, technical data, and other relevant material are available to be submitted to CRMC in enough detail to allow for a determination to be made. These comments were either directly responded to or addressed in the FEIS.

August 9, 2019 – Response received from the United States Department of Interior. The comments requested additional clarification be provided on what is inhibiting the value of the wetlands areas and whether the value could be increased or decreased by the proposed project. The value of the wetland areas has been degraded due to the density of the existing development around the wetlands. In addition to impacting the hydrologic regime of the river by reducing base flows and increasing peak flows, this past development has resulted in some modifications to the river corridor that have degraded adjoining habitat. It is anticipated that in areas where buildings will be removed and floodplain restored, wetland values will be improved by creating additional habitat in areas that are currently buildings and developed land. Additional reviews requested that the big brown bat (*Eptesicus fuscus*), little brown bat (*Myotis lucifugus*), Eastern red bat (*Lasiurus borealis*), and northern long-eared bat (*Myotis septentrionalis*) be



added, and these species were added to the FEIS. If tree clearing is required to access any of the project sites, consultation with the USFWS will be required to address possible impacts to the northern long-eared bat. The level of tree clearing, if any, will be determined during the design and permitting phase of the project. If tree clearing is determined to be required, project proponents will consult with USFWS to determine what mitigating actions should be incorporated into the project. These comments were either directly responded to or addressed in the FEIS.

August 12, 2019 – Response received from the United States Environmental Protection Agency. Reviewers recommended that additional information be provided regarding the potential for wetland impacts. Building floodproofing will be limited to actual building structures or the developed properties (e.g., lawn/driveway) that surround the buildings and thereby will not directly or indirectly impact wetlands. Construction of floodwalls and pump stations will be situated outside of wetlands to limit direct and indirect impacts. Floodplain restoration is proposed primarily in upland areas within the 100-year floodplain and is outside of any wetlands. The constructed elements of the project will comply with the Rhode Island Rules and Regulations Governing the Administration and Enforcement of the Fresh Water Wetlands Act. These comments were either directly responded to or addressed in the FEIS.

CONCLUSION

Based on the findings of the FEIS, NRCS is proposing to implement the Pocasset River Flood Damage Reduction Project in accordance with the Preferred Alternative. The Preferred Alternative includes the installation of flood walls along two sections of the Pocasset River, totaling approximately 2,400 feet in length. Up to approximately 140 properties located within the 100-year floodplain will be acquired, demolished, and converted to floodplain storage. Dry floodproofing will be installed in up to 25 structures. Finally, construction of a bypass culvert along Simmons Brook and the removal of a debris dam at the confluence of Simmons Brook and the Pocasset River will also be completed. Further information regarding this Record of Decision may be obtained by contacting:

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Date: May 13, 2024