



To: Tim Eden, Managing Partner
Starr Capital, LLC

Date: March 14, 2025

Memorandum

Project #: 73562.00

From: Tim Piacentini

Re: Wetlands Investigation
AP 7 Lots 23 and 24
Coventry, Rhode Island

I conducted a field investigation for state- and federal-regulated wetlands at the proposed Coventry Centre site. My investigation took place on March 12, 2025. The site is located north of the intersection of Arnold Road and New London Turnpike in Coventry Rhode Island. The site is bounded by a chemical plant, forest, and a cleared vacant parcel on the north, residential houses on the northeast, Arnold Road on the southwest, and New London Turnpike on the southeast. The site is identified as Town of Coventry assessors plat (AP) 7 Lots 23 and 24.

Criteria for identifying state regulated wetlands resource areas are provided in the Rhode Island Department of Environmental Management (RIDEM) Rules and Regulations Governing the Administration and Enforcement of the Freshwater Wetland Act (Rules)(RIDEM 2022). Federal wetlands are subject to regulation under Section 404 of the Clean Water Act and are identified using criteria provided in the 1987 Army Corps of Engineers Wetland Delineation Manual and the 2012 Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Northcentral and Northeast Region. No state or federal regulated wetlands were observed on the site.

Vegetation across the site was dominated by species which predominately occur in non-wetland areas including: eastern white pine (*Pinus strobus*), northern red oak (*Quercus rubra*), pitch pine (*Pinus rigida*) and hillside blueberry (*Vaccinium pallidum*). Soils observed at the site were lacking redoximorphic features and other characteristics indicative of a wetland hydrologic regime. No other field indicators of wetland hydrology including standing water, watermarks on vegetation and water-stained leaves.

An approximately 12-15 foot deep and 40 foot wide depression was observed on Assessors Plat 8 Lot 24 (see attached photos). There was no vegetation within the depression. Indicators of wetland hydrology including surface water, watermarks, or water-stained leaves were not observed. A profile of the soil at the bottom of the depression was observed in the field and described as follows:

- 0-0.5": Oe moderately decomposed plant material 5YR 2.5/2 (dark reddish brown)
- 0.5-6": A/C loamy fine sandy 2.5Y 2.5/1 (black) moderate subangular blocky friable mixed with fine sand 2.5Y 6/3 (light yellowish brown) single grain loose
- 6-9": Ab loamy fine sand 2.5Y 2.5/1 (black) moderate subangular blocky friable
- 9-10": Bwb1 loamy sand 10YR 4/4 (dark yellowish brown) moderately subangular blocky friable
- 10" + : Bwb2 loamy sand 10YR 5/6 (yellowish brown) moderately subangular blocky friable

No indicators of hydric soils were observed in the soil profile described.

Due to the lack of hydrophytic vegetation, hydric soils, and other indicators of wetland hydrology, this depression is not a wetland resource.

Additionally, there did not appear to be any wetlands within 200 feet of the site. The necessary permissions to include the abutting parcels in the investigation were not received however, the abutting parcels have been either commercially or residentially developed, or are dominated by the same vegetation observed on the site, which did not indicate the presence of wetland conditions.

