

**STATE OF RHODE ISLAND  
COASTAL RESOURCES MANAGEMENT COUNCIL**

**IN THE MATTER OF:**

**Perry Raso**

**CRMC File No. 2017-12-086**

**MOTION TO INTERVENE**

Now comes Andrew Wilkes and 454 Beach Rd, LLC (“Wilkes”), by and through their attorney, and hereby move to intervene in this matter concerning Perry Raso’s application for an Assent to create and maintain a three-acre oyster and bay scallop farm in Segar Cove of Potter Pond (the “Project”). In support of this motion, Wilkes states as follows:

1. 454 Beach Rd, LLC is a single member Rhode Island Limited Liability Company, managed by Andrew Wilkes.
2. Wilkes is the owner of property located at 454 Matunuck Beach Road, South Kingstown, RI, with a dock located on the west shoreline of Segar Cove with a direct view of the proposed Project.
3. On or about February 1, 2018, Wilkes notified CRMC of his objection to the Project and requested a hearing.
4. Wilkes’ substantial interests and rights with respect to navigation, recreation and fisheries will be substantially and directly affected by the Project.
5. Wilkes is justifiably concerned that existing parties cannot adequately represent their interests, and that their ability to protect their interest will be impaired without intervention.
6. No party will suffer any prejudice.

WHEREFORE, Andrew Wilkes and 454 Beach Rd, LLC respectfully request that CRMC grant their motion to intervene and permit them to participate in the matter as a Party.

Respectfully submitted,

Andrew Wilkes and 454 Beach Rd,  
LLC

By their attorneys

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**CERTIFICATE OF SERVICE**

I certify that on this 9<sup>th</sup> day of November, 2020 I served this document via regular and electronic mail upon the following parties:

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/s/ Allison Y. Charette