(401) 783-3370 Fax (401) 783-2069

April 2, 2024

W. Mark Russo, Esq. Ferruci Russo Dorsi, PC 207 Quaker Lane, Ste 301 West Warwick, RI 02893 John C. Revens, Jr., Esq Revens Revens St. Pierre & Wyllie 946 Centerville Road Warwick, RI 02886

William R. Landry, Esq. Blish & Cavanagh, LLP 30 Exchange Terrace Providence, RI 02903

RE: CRMC Files No. 1976-04-013, 1994-09-044, 2021-09-093, & 2023-03-009 Site Location: 1157, 1159 & 1161 Succotash Road, Narragansett, RI; Plat(s): I-J Lot(s): 64-1, 64-2, 64-3

Dear Counsellor Russo, Counsellor Revens and Counsellor Landry:

Following up on today's teleconference regarding the current/proposed Jerusalem pier configurations located at the above sites, CRMC staff appreciates the parties working together on their own resolution. Per your request, please find guidance on the associated CRMC review.

Doug Mancosh, has a pending CRMC application (#1976-04-013) for modification of the existing pier. Specifically, the applicant seeks as-built approval for the existing layout of the commercial structure, as well as designation of a Structural Perimeter Limit (SPL). Revised plans were last received February 16, 2024, and public notice is the next step in the review process.

Bill Gilbane, has a Council-approved residential boating facility (#2021-09-093), however, no Assent has been issued as an appeal was filed by the southern abutter (Walker). This approval was for a new fixed pier/boat lift at the site of a previously long-existing but unauthorized pier/ramp/float. It is staff's understanding that a revision to this layout is proposed, which requires Modification of this application in order to begin public notice.

Ben Walker, the southern-most owner of an existing permitted Limited Marina (#1994-09-044), filed a Preliminary Determination (#2023-03-009) for comments regarding adding additional floats (which had been removed to resolve Enforcement action). An application to modify the existing Marina Perimeter Limit (MPL) to include the additional float layout was noted in the PD report and is the next step required in order to begin public notice.

Overall, based on the submitted information to-date, the historical use of the local area and the 2/16/24 Mancosh-submitted plan, CRMC staff can support the overall layout. However, as previously discussed, each of the three facilities require separate documentation, accurate site plans and staff review. As they are commercial, residential and marina status, each requires slightly different supporting information, reflecting the requirements of Redbook Section 1.3.1(D)'s applicable standards as well as any variances per Section 1.1.7. Additionally, each requires RI-registered PE and/or PLS-stamped plans.

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In order to expedite staff review, one common site plan should be prepared for the three sites, reflecting existing approvals and proposed configuration of all three sites, including coastal feature, bathymetry, approved MPL and pier layouts, property line extensions, etc.

Staff can commence the 30day public notice simultaneously for all three applications, pending receipt of a complete application from Walker and Gilbane and revised final plans for Mancosh (as they need updating to reflect all three sites appropriately). During the notice process, ACOE review will commence, though the ACOE may require additional information beyond CRMC requirements.

Following close of public notice, staff reports will be prepared for *Council hearing of the three applications on one date.* Please note the earliest Council agenda availability is currently late May.

Please reference the 1/11/23 Walker approved plans by Jeffrey Balch, PLS and the 10/12/22 Gilbane last revised plans (per Council Decision) by Mark Dowdell, RPE as the basis for the existing conditions on the final shared plan. The proposed conditions by Mancosh were last submitted 2/16/24 by Russell Morgan, RPE.

Some items to consider in this final plan include:

- 1—The Redbook prohibits new floats and new docking over SAV for residential boating facilities, so the **touch-and-go only** stipulation will remain re Gilbane layout.
- 2—An **SPL** (10' from structure/piling) will be required for the as-built commercial Mancosh pier, and a permit will resolve existing violation re the pier.
- 3—A modified MPL (10' from structure/piling), without increase in boat count, will be required for the proposed Walker marina layout.

It remains CRMC's goal to achieve legal structures with reduced user conflicts at these sites and welcomes review of these applications to accomplish such.

Sincerely

Jeffrey M. Willis, Executive Director Coastal Resources Management Council

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