



Proactive by Design

GEOTECHNICAL  
ENVIRONMENTAL  
ECOLOGICAL  
WATER  
CONSTRUCTION  
MANAGEMENT



February 15, 2024  
File No. 03.0035251.00

Ms. Tracy Silvia  
RI Coastal Resources Management Council  
4808 Tower Hill Road; Suite 3  
Wakefield, Rhode Island 02879

Re: 2<sup>nd</sup> Modification for **(1976-04-013)**  
Douglas Mancosh – Floating Dock  
1161 Succotash Road (Plat I-J, Lot 64-1)  
Narragansett, Rhode Island

Dear Ms. Silvia:

On behalf of our Client, Mr. Douglas Mancosh, on October 13, 2023 GZA provided CRMC with an application for the Modification of Assent No. 2019-09-020. Subsequent communications with CRMC concluded that the Modification should be “the 2<sup>nd</sup> Mod for 1976-4-13 Assent rather than a modification to Maintenance permit 2019-09-020.” The initial Assent 1976-4-13 was to “repair and maintain and existing timber pier.” The 1<sup>st</sup> Modification, approved March 4, 1998, was to “increase the width of the commercial dock from 4 feet to 6 feet to improve lobster gear access to commercial fishing boats.” This 2<sup>nd</sup> modification is to change the dock type from a fixed dock to a floating dock with piles located outside of the 6-foot deck, which results in a slightly wider “footprint”. Alignment and length of dock have not changed.

A recent email from you on November 20, 2023 noted that the “standard dock information” is missing and is needed to continue processing the application. Also, information prescribed in Sections 1.3.1 (C) and 1.3.1 (D) of the Redbook should be addressed as practicable. Hence, herewith is the requested information. Some of this information has been provided in previous responses/discussions.

#### 1.3.1.C Residential, Commercial, Industrial, and Recreational Structures

- A floating dock has been constructed in the location of a fixed dock that was initially constructed in the early 1930s. The floating dock does not contain any gas or sewer lines.
- The floating dock has been certified by a Rhode Island Registered Professional Engineer (PE).
- One of the Policies notes that all commercial structures in tidal waters shall obtain a SPL. From a review of prior assents, it appears that a SPL was never established (or even mentioned) for this dock. Since the new floating dock is the same length, has the same alignment, and is only 20 inches wider than the previous fixed dock, this would be well within the standard 10-foot offset limit of a SPL.
- The new floating dock is not closer to any surrounding approved mooring field. Once again, we stress that the floating dock is the same length and alignment as the fixed dock was.
- The dock has historically been a berthing location for various types of commercial fishing vessels and occasionally recreational vessels as well.
- Of the applicable prohibitions, new structures and expanded structures with non-water dependent commercial uses are prohibited in or over tidal waters. In this case, the dock has been and is being used by commercial fishing personnel to conduct fishing activities, berth vessels, and load/unload supplies and catches – all water dependent uses. And occasionally, recreational vessels may also use the dock.





- Seven (7) tie-off piles existed around the perimeter of the timber pile supported dock. However, these tie-off piles were removed during construction of the floating dock and have not been replaced. This has considerably improved vessel maneuvering in this congested area.
- The new floating dock has not detrimentally impacted transportation and/or utility services to support the proposed operations.
- It should be noted that the current Red Book regulations prohibit terminal floats at residential and limited recreational docks in excess of 200 square feet and shared residential recreational docks in excess of 300 square feet. The existing dock, however, has always been designated as a commercial dock throughout CRMC records.
- The end of the floating dock is no less than 135 feet from the navigable waterway. The depth of channel is 15 feet; this is in excess of the minimum setback of  $3 \times \text{depth of channel} = 45$  feet.

#### 1.3.1.D Recreational Boating Facilities

- A Submerged Aquatic Vegetation (SAV) survey was conducted in July 2023, and a summary report has been previously provided to CRMC. The SAV report concludes that impacts to SAV are minimal; only a few small areas of eel grass were observed. This is corroborated by historic aerial images when the prior pile supported dock was removed.
- PE stamped plans showing profile and plan views are provided with this narrative. MLW and MHW are indicated.
- Structural elements of the dock meet the guidelines provided by ASCE, as concluded by a PE.

A current mailing list of abutters and those affected by the 25-foot offset is attached. These consist of another Mancosh parcel to the north and Gilbane and Walker parcels to the south.

It is understood that decisions made during construction of the dock were made without proper authorization from CRMC. A review of the current CRMC policies concludes that the constructed dock appears to meet the important CRMC policies concerning commercial docks and boating facilities, especially for Type 5 waters. The construction of the existing dock with removal of several original tie-off piles has provided more space for vessel maneuvering, reduced congestion, and, most importantly, has not had a detrimental impact on submerged aquatic vegetation.

Your consideration is greatly appreciated. Please advise if any additional information is needed.

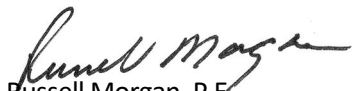
Thank you.



Igor Runge, Ph.D., P.H.  
Senior Consultant



Matthew Page, P.E.  
Consultant/Reviewer



Russell Morgan, P.E.  
Senior Principal

Attachments: PE Certified Dock Plans  
List of Abutters

