

Lisa Turner

From: Jennifer Cervenka <jcervenka@cgdesq.com>
Sent: Monday, June 2, 2025 9:02 PM Received 06-03-2025
To: Jeff Willis; De Sisto, Tony; Brian Harrington; Lisa Turner
Cc: Janice Mathews; Main, Robin L.
Subject: QCC - Enforcement File No. 2023-0185 - Amended Prehearing Memorandum and Motion to Assign
Attachments: QCC Amended Prehearing Memorandum for 6_2_2025.pdf; 20250516 Letter to B. Harrington.pdf; 2025-05-16 Coastal Restoration Plan.pdf; PI-INHS-Resume-Municipal-Chris Duhamel.pdf; QCC Motion to Assign to HO 5_5_25.pdf

Good evening Jeff/Tony:

In connection with next week's enforcement action hearing, please see the attached Amended Prehearing Memorandum and additional documents, including our Motion to Assign to a Hearing Officer. R.I. Gen. Laws § 46-23-20 clearly states that "all contested enforcement proceedings...shall be heard by the administrative hearing officers". At a minimum, QCC's May 16, 2025 letter to Brian Harrington, prior correspondence between the agency and QCC, and the CRMC staff report demonstrate that the restoration build-out line is a contested issue. Accordingly, we request that the Motion to Assign be placed on the Council's agenda for June 10, 2025 and that it be addressed prior to commencement of the enforcement hearing.

Thank you,
Jenn

Jennifer Cervenka | Member



cervenka green & ducharme llc

225 Dyer Street, 2nd Floor
Providence, RI 02903
(401) 480-8768
jcervenka@cgdesq.com

RHODE ISLAND COASTAL RESOURCES MANAGEMENT COUNCIL

RE: QUIDNESSETT COUNTRY CLUB

CRMC File No.: 2023-0185

**AMENDED PREHEARING MEMORANDUM OF RESPONDENT
QUIDNESSETT COUNTRY CLUB ON ENFORCEMENT ACTION**

Pursuant to 1.5.9 of the Coastal Resources Management Council's Management Procedures, Respondent Quidnessett Country Club ("QCC") submits the within Prehearing Memorandum to address restoration at the northeastern shoreline of 850 N. Quidnessett Road, North Kingstown, setting forth its list of witnesses expected to testify and documents it intends to introduce at an upcoming Council meeting.

Witnesses:

1. Sergio Cherenzia, P.E., Cherenzia & Associates. Mr. Cherenzia is expected to testify about: 1) the restoration plans prepared by his office and submitted to the CRMC between August 2024 and March 2025; 2) documents, photographs, and aerial photographs he has reviewed to evaluate the CRMC-approved restoration of QCC's shoreline in 2013; and 3) the rock removal application submitted to the US Army Corps of Engineers.
2. Chris Duhamel, P.E., PLS, DiPrete Engineering, who will testify about approved plans for 2013 restoration of QCC's shoreline and the CRMC Emergency General Permit, 2013-03-133, issued to QCC.
3. Representative from Natural Resources Services, Inc., who is expected to testify about 2013 restoration work at QCC's shoreline, as reflected in invoices sent to QCC, and as-built graphic of 2013 restoration.



Documents:

1. Restoration Plan by Cherenzia & Associates and associated correspondence submitted by QCC to CRMC on March 28, 2025.
2. Restoration Plan by Cherenzia & Associates and associated correspondence submitted by QCC to CRMC on November 1, 2024.
3. Restoration Plan by Cherenzia & Associates and associated correspondence submitted by QCC to CRMC on September 20, 2024.
4. Restoration Plan by Cherenzia & Associates and associated correspondence submitted by QCC to CRMC on August 16, 2024.
5. Restoration Plan by Cherenzia & Associates and associated correspondence submitted by QCC to CRMC on May 16, 2025.
6. Rock Removal Below Hide Tide Line Application submitted by QCC to the U.S. Army Corps of Engineers dated February 28, 2025.
7. CRMC Emergency General Permit issued to QCC, 2013-03-133.
8. DiPrete Engineering Emergency Assent Submission Site Plan for QCC shoreline approved by CRMC on March 19, 2013.
9. As-built graphic of 2013 restoration prepared by Natural Resource Services, Inc. (“NRS”), June 2013.
10. Cherenzia & Associates graphic overlaid with NRS as-built detail dated February 13, 2025.
11. Invoices from Natural Resource Services, Inc. to QCC covering dates between March and June 2013.
12. “Janet Photos” produced by CMRC on March 26, 2025.
13. Photograph taken by William Janikies of QCC shoreline on December 26, 2022.
14. Curriculum Vitae of Sergio Cherenzia, P.E.
15. Curriculum Vitae of Chris Duhamel, P.E., PLS
16. QCC Motion to Assign to a Hearing Officer dated May 5, 2025



Respectfully submitted:
Quidnessett Country Club

By and through its attorneys,

/s/ Jennifer Cervenka

Jennifer Cervenka, Esq. (#6340)
Cervenka Green & Ducharme LLC
225 Dyer Street, 2nd Floor
Providence, RI 02903
T: (401) 214-1022
jcervenka@cgdesq.com

/s/ Robin Main

Robin Main, Esq. (#4222)
Hinkley Allen
100 Westminster St., Suite 1500
Providence, RI 02903
T: (401) 274-2000
rmain@hinkleyallen.com





Jennifer R. Cervenka
(401) 214-1022
jcervenka@cgdesq.com

May 16, 2025

VIA EMAIL ONLY

Brian A. Harrington
Environmental Scientist III
Coastal Resources Management Council
Oliver H. Stedman Government Center
4808 Tower Hill Road, Suite 3
Wakefield, RI 02879-1900
bharrington@crmc.ri.gov

Re: Quidnessett Country Club, Inc. ("QCC") – Cease & Desist Order, Notices
of Administrative Fines, CRMC Enforcement File No. 23-0185

Dear Mr. Harrington:

Enclosed please find QCC's Coastal Restoration Plan, which proposes a modified shoreline protection facility. As you know, QCC and the agency are not in agreement as to the build out line for shoreline protection (which we refer to as the 2013 "magenta line"). Confirmation of this line is critical for QCC's engineers to be able to design a resilient system, especially as it relates to the northern end of QCC's shoreline. Further, QCC has moved to assign this matter to an Administrative Hearing Officer, which motion the agency has not addressed. QCC asks that the motion be addressed prior to any Council meeting as the hearing officer should address proposed findings of fact and conclusions of law in this matter.

Despite the lack of a hearing officer process at this time, QCC is abiding by your deadline and providing the attached plan depicting the removal of up to two hundred feet of rock from the southern end of the revetment, addition of non-structural protection in its place, and the removal of all rocks from tidal waters and below the High Tide Line and/or magenta line.

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225 Dyer Street, 2nd Floor, Providence, RI 02903
www.cgdesq.com | p: (401) 214-1020



Also, I have not been able to review all of the APRA records produced by the CRMC late last week. As such, we reserve the right to make additional changes to plan consistent with the agency's records.

Sincerely,



Jennifer R. Cervenka

Enclosure (1)

cc: Janice Mathews, QCC
Robin L. Main, Hinkley Allen
Sergio F. Cherenzia, PE, Cherenzia & Associates, Ltd.
Joseph Klinger, Ecotones, Inc.
Joshua Rosenberg, PE, RMA Environmental, LLC
Anthony DeSisto, CRMC Chief Legal Counsel
Jeffrey M. Willis, CRMC Executive Director
Elizabeth Waterhouse, ACOE



COASTAL RESTORATION SITE DEVELOPMENT PLANS

950 NORTH QUIDNESSETT ROAD
PLAT 167 LOT 2
NORTH KINGSTOWN, RHODE ISLAND

ISSUED FOR PERMITTING

PREPARED FOR
QUIDNESSETT COUNTRY CLUB INC.

DATE ISSUED: MAY 16, 2025



PROJECT TEAM
CIVIL & GEOENVIRONMENTAL ENGINEER:



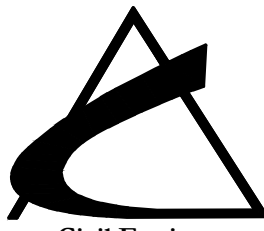
RMA ENVIRONMENTAL LLC
20 MAIN STREET
NORTH KINGSTOWN, RI 02852

ENVIRONMENTAL SCIENTIST:



ECOTONES, INC. EAST GREENWICH, RI 02888
ENVIRONMENTAL CONSULTANTS PHONE: 401-256-5599 FAX: 401-256-5591

LAND SURVEYOR & CIVIL ENGINEER:



Civil Engineers
Land Surveyors
Land Use Planners
Environmental Engineers

INDEX TO SHEETS	
No.	SHEET TITLE
C-0	COVER
SV-1	EXISTING CONDITIONS PLAN
C-1	SITE PLAN
C-2	DETAILS

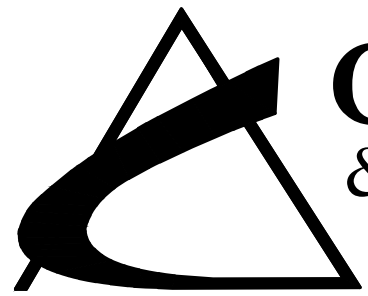


ISSUED FOR REGULATORY REVIEW
ONLY - NOT FOR CONSTRUCTION

OWNER/APPLICANT

QUIDNESSETT COUNTRY CLUB INC.
PO BOX 860
EAST GREENWICH, RHODE ISLAND 02818

COASTAL RESTORATION PLAN
QUIDNESSETT COUNTRY CLUB
950 NORTH QUIDNESSETT ROAD
PLAT 167 LOT 2
NORTH KINGSTOWN, RHODE ISLAND
CA JOB # 224031



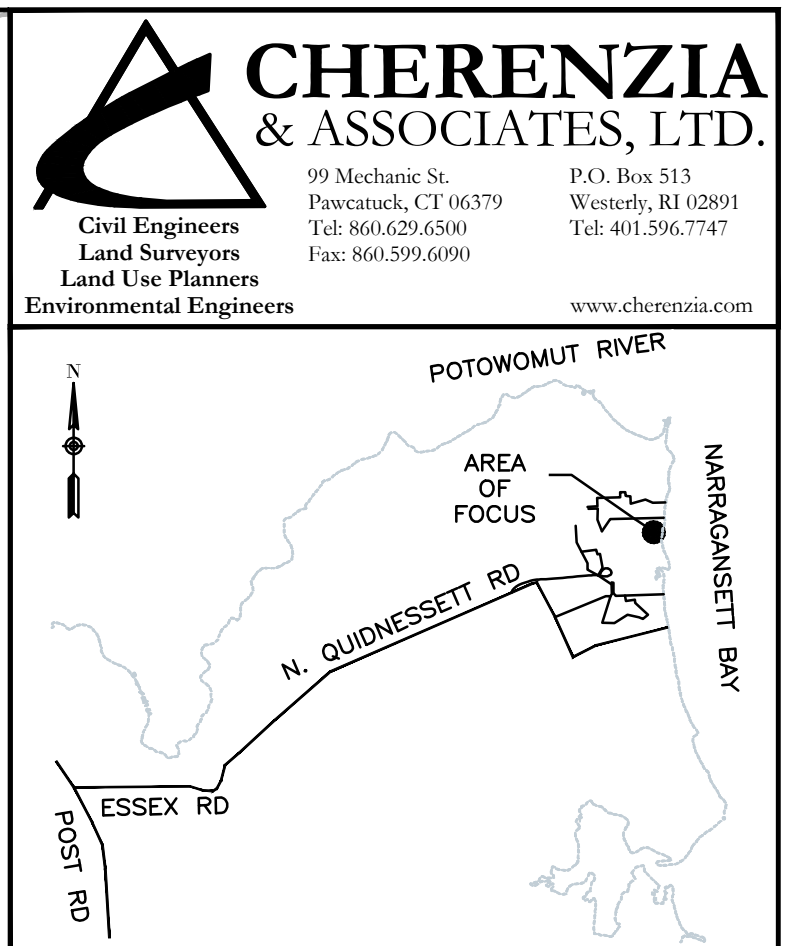
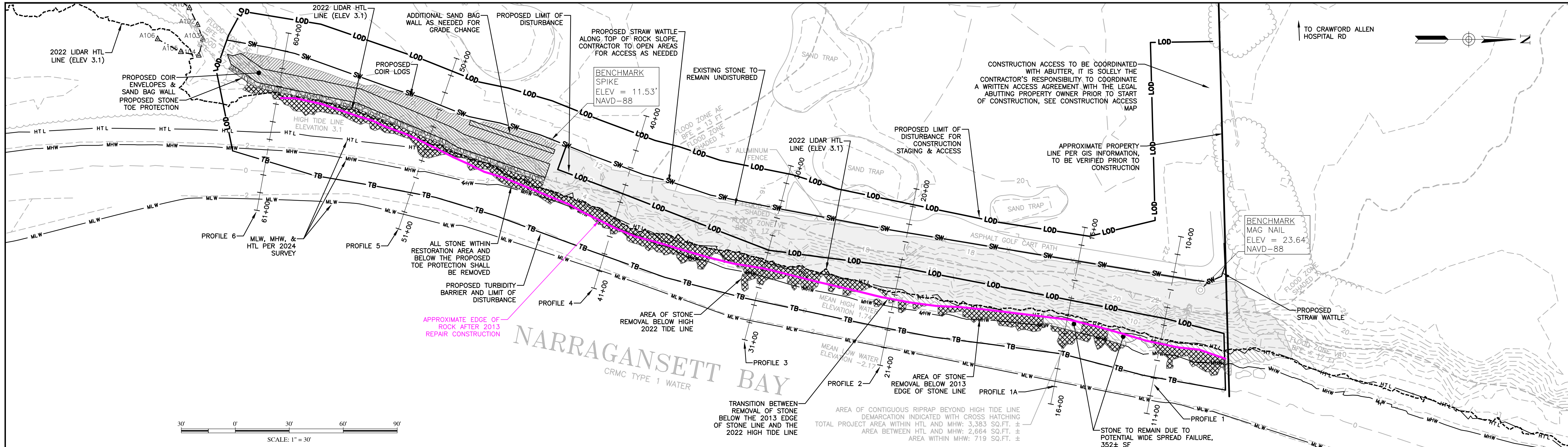
**CHERENZIA
& ASSOCIATES, LTD.**

Civil Engineers
Land Surveyors
Land Use Planners
Environmental Engineers

99 Mechanic St.
Pawcatuck, CT 06379
Tel: 860.629.6500
Fax: 860.599.6090

P.O. Box 513
Westerly, RI 02891
Tel: 401.596.7747

www.cherenzia.com



LOCATION MAP

- NOTES:
1. THE DESIGN BASED ON THE HTL ESTABLISHED PER THE 2024 QUONSET TIDE GAUGE PREDICTIONS AS STORMS IMPACT THE AREA. THE HTL IS SHOWN ON THE SURVEY PLAN PREPARED BY CHERENZIA & ASSOCIATES, LTD. TITLED EXISTING CONDITIONS PLAN, DATA ACCUMULATION SURVEY SHEET SV-1 PREPARED FOR QUIDNESSETT COUNTY CLUB DATED JUNE 7, 2024 REVISED JULY 23, 2024.
 2. A BOUNDARY SURVEY HAS NOT BEEN PERFORMED FOR THE PROPERTY.
 3. ANY EXISTING SHORELINE VEGETATION SHALL BE PRESERVED BOTH DURING AND AFTER WORK COMPLETION.
 4. STONE SHALL BE REMOVED AND REPLACED WITH BEACH SAND AS NEEDED. SAND SHALL COME FROM AN UPLAND SOURCE AND CONSIST OF NATURAL SAND GRAINS THAT ARE SIMILAR IN GRAIN SIZE, SHAPE, AND COMPOSITION TO SAND CURRENTLY ON THE BEACH. SAND SHALL CONSIST OF 90% OR MORE SAND SIZED GRAINS. SAND SHALL NOT BE MINED FROM THE ACTIVE COASTAL FEATURES (E.G. DUNES AND BEACH).
 5. REMOVED STONE SHALL EITHER BE REMOVED FROM THE SITE OR BASED ON DIRECTION FROM THE PROJECT ENGINEER, USED TO SUPPLEMENT THE EXISTING STONE SLOPE ABOVE THE HTL.
 6. IN ADDITION TO THE HTL PROVIDED ON THE 2024 SURVEY, A HTL LINE (ELEV. 3.1) IS COMPILED FROM THE 2022 LIDAR ELEVATION INFORMATION. THE 2022 LIDAR WAS BEFORE THE STONE SLOPE WAS CONSTRUCTED AND THE STORMS THAT ERODED THE PREVIOUS SLOPE.
 7. THE PROJECT AREA IS LOCATED IN FEMA FLOOD ZONE VE WITH BFE=17 FEET, ZONE AE WITH BFE=13 FEET, AND AREAS OF 0.2% ANNUAL CHANCE FLOOD HAZARD BASED ON FEMA MAP #44090C0018J WITH EFFECTIVE DATE OF OCTOBER 16, 2013.
 8. THE AREA OFFSHORE IS A RIEMEN SHELLFISH MANAGEMENT AREA (HIGH BANKS MANAGEMENT AREA 9B).
 9. VEGETATION SHALL BE COORDINATED WITH A COASTAL BIOLOGIST. NATIVE PLANTS WILL BE SELECTED FROM THE CRMC COASTAL BUFFER ZONE PLANTING GUIDE REVISED AUGUST 2008.
 10. CHERENZIA MAKES NO GUARANTIES OF THE EFFECTIVENESS AND/OR LASTING INTEGRITY OF THIS NON-STRUCTURAL RESTORATION.

- PLAN REFERENCES:
1. SURVEY PLAN PREPARED BY CHERENZIA & ASSOCIATES, LTD. TITLED EXISTING CONDITIONS PLAN, DATA ACCUMULATION SURVEY PREPARED FOR QUIDNESSETT COUNTY CLUB DATED JUNE 7, 2024 REVISED JULY 23, 2024.
 2. WETLANDS HAVE BEEN DELINEATED BY ECOTONES INC. AND SURVEY LOCATED.

PLAN REVISIONS				
REV. NO.	DATE	DESCRIPTION	DWN BY	CHK BY

SCALE: AS NOTED
CA JOB # 224031
DATE: MAY 16, 2025

DRAWN BY: AKG
CHECK BY: SFC

ISSUED FOR REGULATORY REVIEW
ONLY - NOT FOR CONSTRUCTION

SITE PLAN

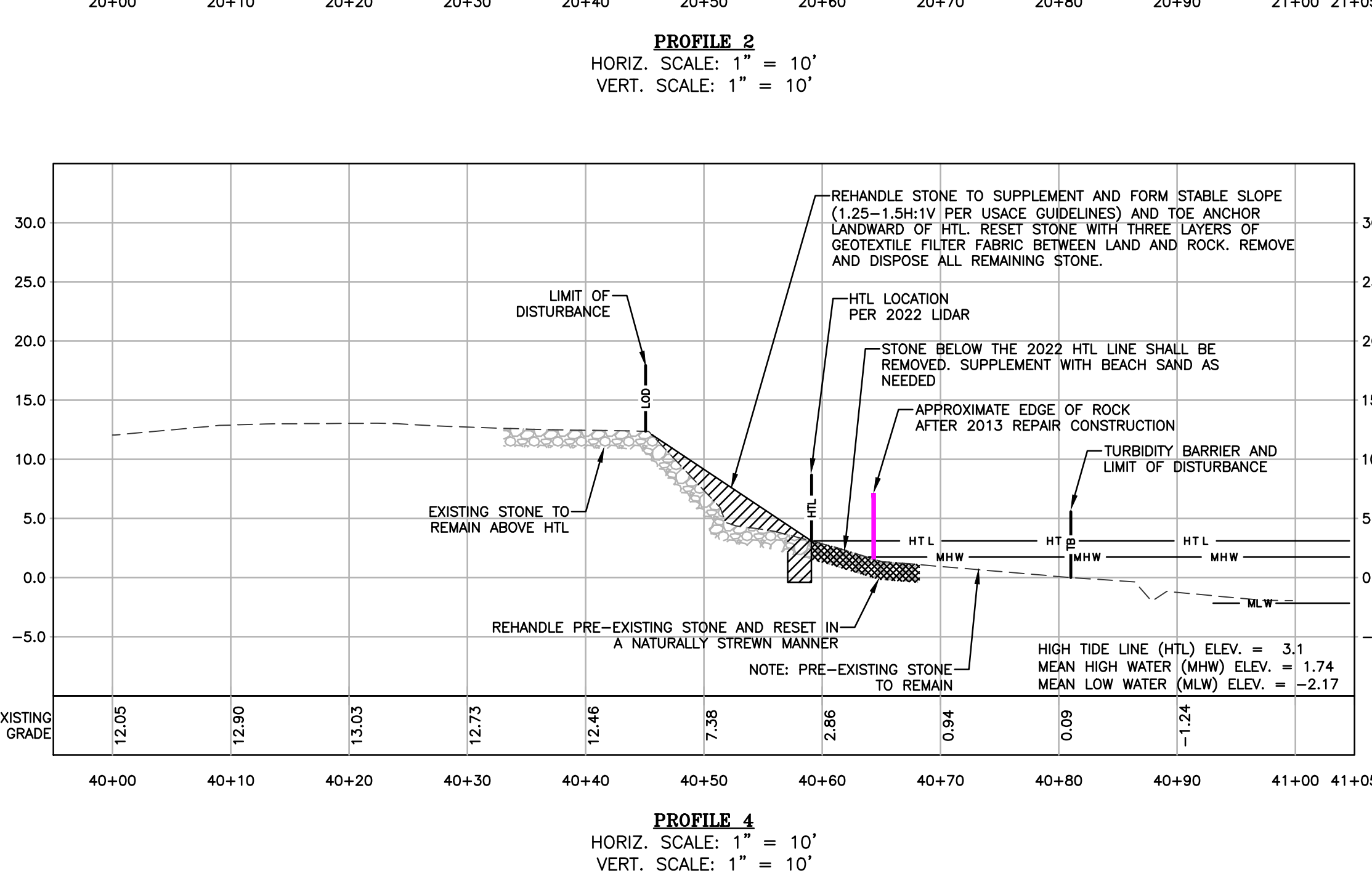
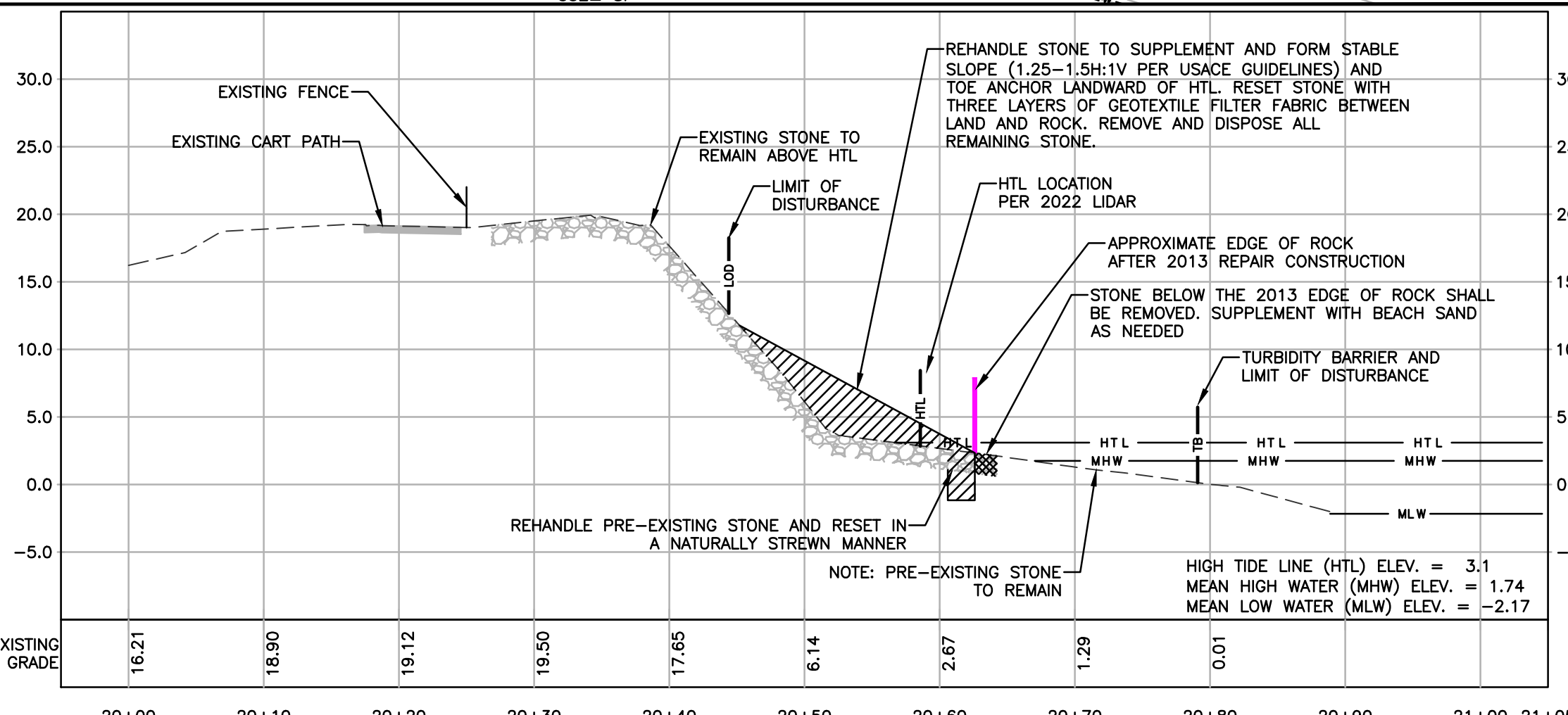
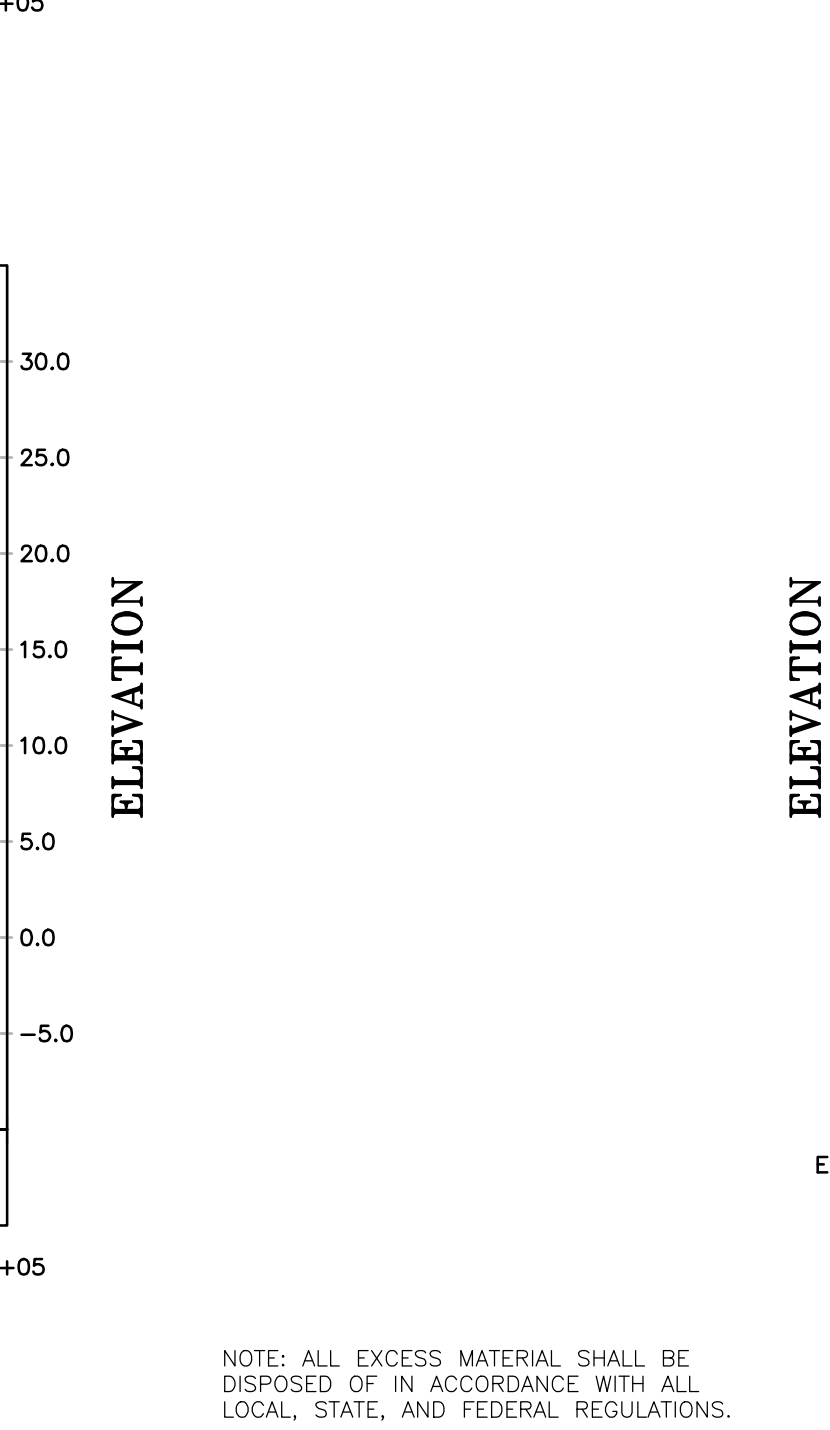
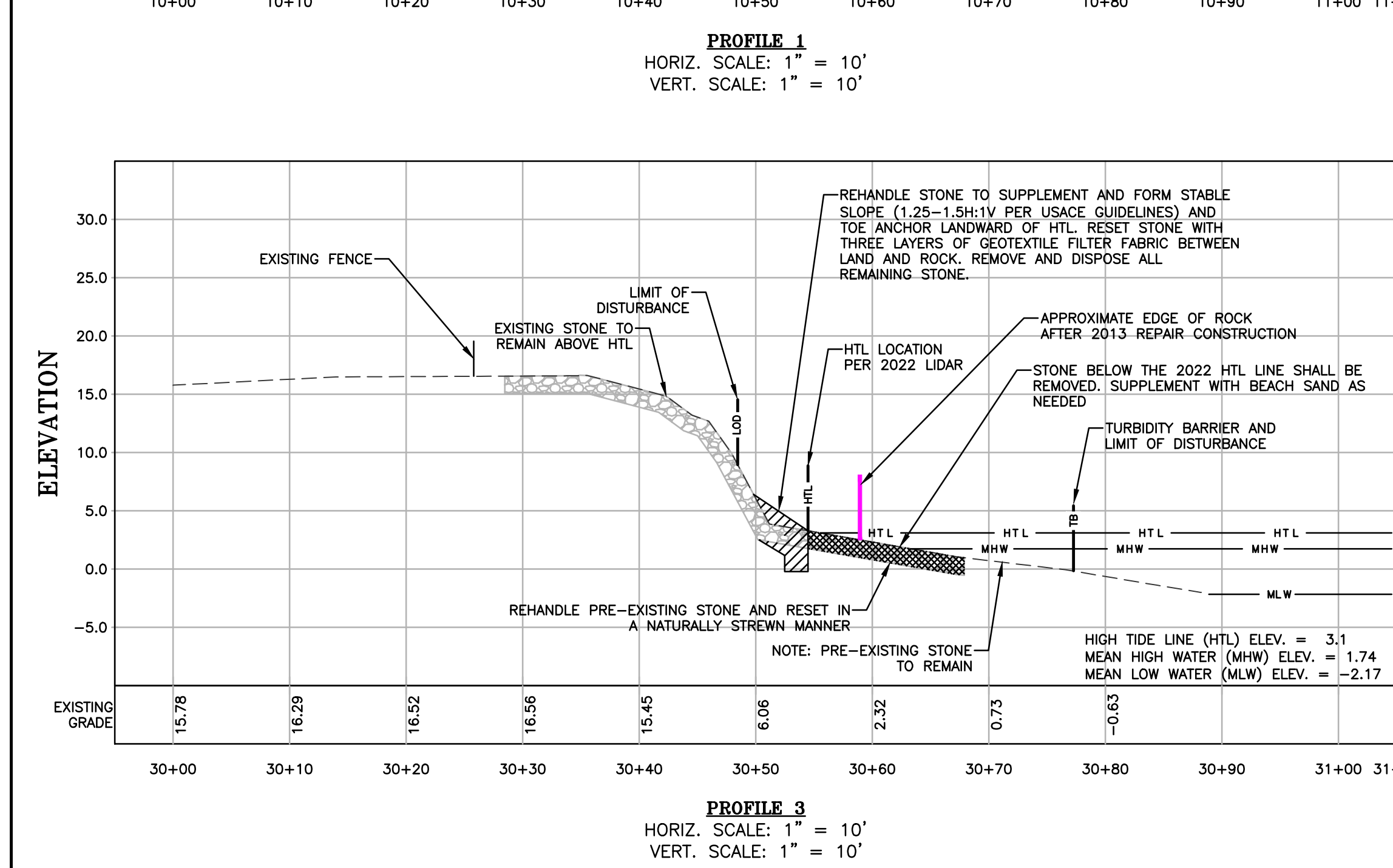
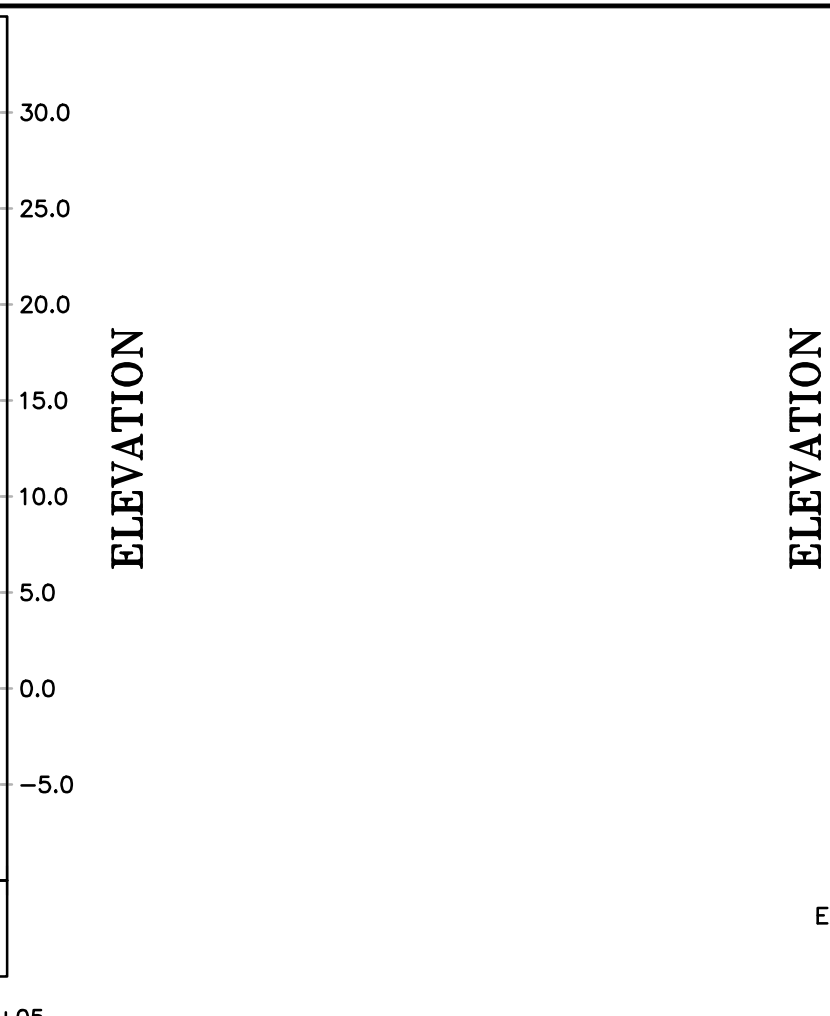
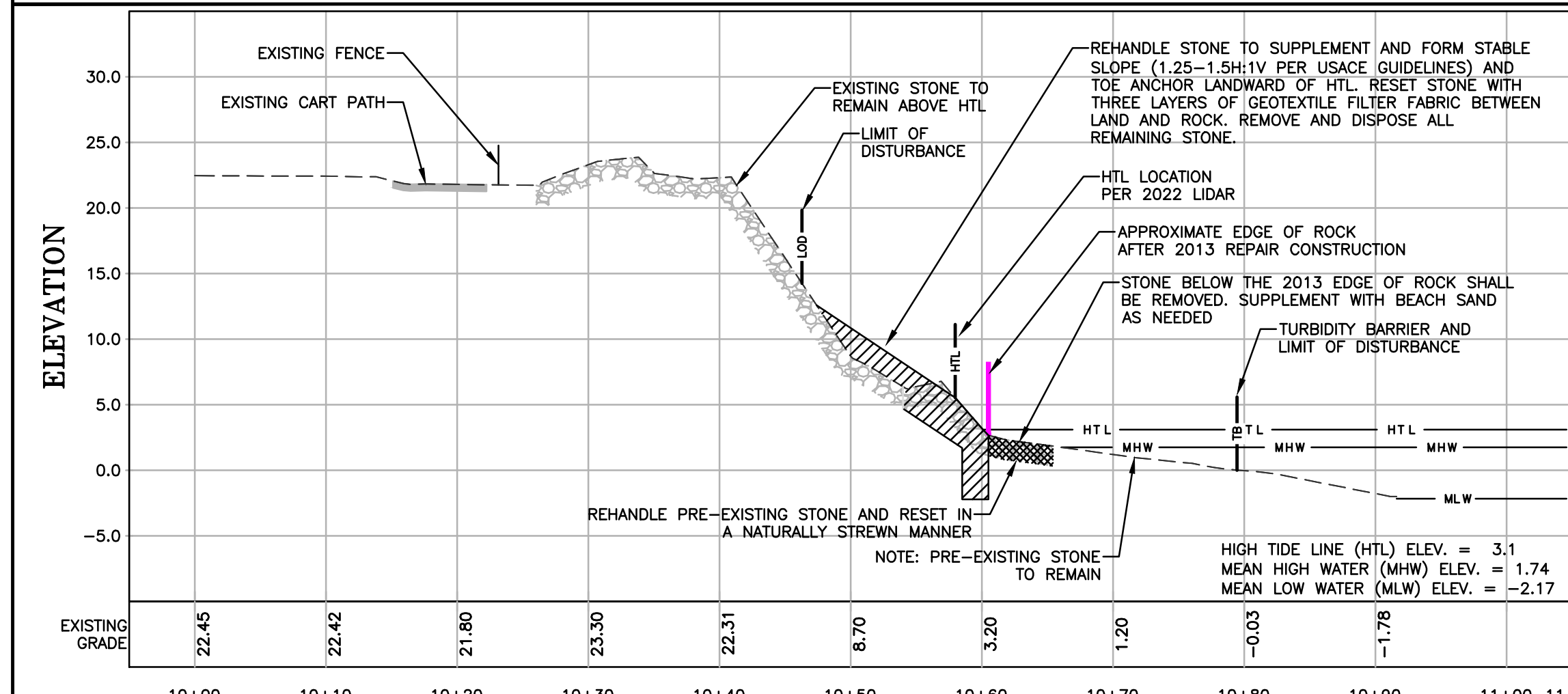
RECEIVED
06-03-2025
COASTAL RESOURCES
MANAGEMENT COUNCIL

COASTAL RESTORATION PLAN
QUIDNESSETT COUNTRY CLUB
950 NORTH QUIDNESSETT ROAD
PLAT 167 LOT 2
NORTH KINGSTOWN, RHODE ISLAND

PREPARED FOR
QUIDNESSETT COUNTRY CLUB INC.

C-1

Sheet 1 of 2



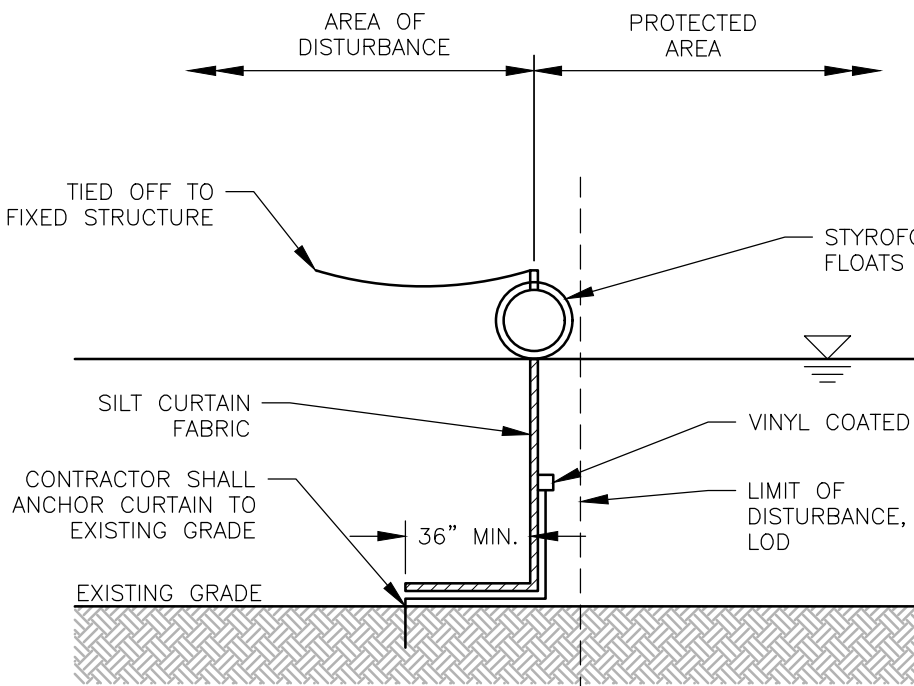
NOTE: ALL EXCESS MATERIAL SHALL BE
DISPOSED OF IN ACCORDANCE WITH ALL
LOCAL, STATE, AND FEDERAL REGULATIONS.

GENERAL CONSTRUCTION NOTES:

1. ALL WORK TO BE PERFORMED UNDER OBSERVATION OF AN ENGINEER EXPERIENCED WITH COASTAL ENGINEERING AND EROSION
2. ALL WORK SHALL CONFORM TO THE STANDARDS AND REQUIREMENTS AS SHOWN IN THESE PLANS, NOTES, AND REGULATORY DOCUMENTS APPLICABLE TO THIS WORK
3. ALL SAFETY REGULATIONS ARE TO BE STRICTLY FOLLOWED. METHODS OF CONSTRUCTION AND ERECTION OF STRUCTURAL MATERIAL ARE THE RESPONSIBILITY OF THE CONTRACTOR. ALL WORK SHALL COMPLY WITH FEDERAL LAWS, STATE REGULATIONS, AND LOCAL LAWS AND STATUTES AND THE REQUIREMENTS AND CONDITIONS OF ALL REGULATORY PERMITS ISSUED FOR THE WORK.
4. ALL WORK SHALL CONFORM TO THE LATEST EDITION OF THE OSHA CODE, THE RHODE ISLAND STATE BUILDING CODE, AND THE REFERENCED STANDARDS INCLUDED HEREIN THAT ARE APPLICABLE TO THIS PROJECT.
5. PRIOR TO CONSTRUCTION, THE CONTRACTOR SHALL VERIFY THE CONDITIONS SHOWN HEREIN AND NOTIFY THE ENGINEER OF ANY DISCREPANCIES IN DIMENSIONS AND/OR SITE CONDITIONS PRIOR TO THE FABRICATION AND/OR ORDERING OF ANY CONSTRUCTION MATERIALS. THE CONTRACTOR SHALL NOT BEGIN CONSTRUCTION IN ANY SUCH AFFECTED AREA UNTIL THE DISCREPANCY HAS BEEN RESOLVED BY THE CONTRACTOR AND APPROVED BY THE ENGINEER. THE CONTRACTOR SHALL BE RESPONSIBLE FOR BRINGING ALL ELEMENTS OF THE PROJECT IN CONFORMANCE WITH THESE PLANS AND SPECIFICATIONS. IF ANY MODIFICATIONS ARE REQUIRED IN ANY ELEMENT, THE CONTRACTOR SHALL SUBMIT PROPOSED CHANGES TO THE ENGINEER FOR REVIEW
6. THE OWNER MUST INFORM THE CONTRACTOR OF THE EXISTENCE AND LOCATION OF ANY AND ALL KNOWN UNDERGROUND UTILITIES ON SITE. THE ENGINEER MAKES NO REPRESENTATION THAT ALL UTILITIES PRESENT ON AND BELOW THE SITE ARE SHOWN ON THE PLANS. THE CONTRACTOR SHALL NOTIFY DGS SAFE AND VERIFY EXACT LOCATIONS OF ALL EXISTING UNDERGROUND UTILITIES PRIOR TO THE START OF ANY CONSTRUCTION. THE ENGINEER OR CONTRACTOR ASSUME NO LIABILITY FOR DAMAGE IF THE WORK BREACHES ANY UTILITY LINE. THE OWNER MUST COORDINATE WITH THE CONTRACTOR TO PROPERLY RELOCATE THEIR UTILITY LINES AND TO REPAIR/REPLACE ALL UTILITIES DAMAGED DUE TO THE WORK DESCRIBED ON THE ATTACHED DRAWINGS.
7. THE CONTRACTOR SHALL OBTAIN AND PAY FOR ALL NECESSARY PERMITS, LICENSES, CERTIFICATES OF INSPECTION, AND PAY ALL LEGAL FEES IN CONNECTION WITH THE WORK OF THIS CONTRACT. THE OWNER HAS OBTAINED NECESSARY REGULATORY PERMITS REQUIRED FOR THE WORK IN REGULATED AREAS. THE CONTRACTOR SHALL REQUEST COPIES OF THOSE REGULATORY PERMITS AND MAKE PROVISION IN THIS WORK AND IN THE COST OF THE WORK FOR ALL APPLICABLE CONDITIONS OF THOSE PERMITS. FAILURE TO CONSIDER ANY CONDITION OF THE REGULATORY PERMITS AS A PART OF THE BID SHALL NOT RELIEVE THE CONTRACTOR FROM HIS RESPONSIBILITY TO APPLY THOSE CONDITIONS TO HIS WORK AT NO ADDITIONAL COST TO THE OWNER
8. THE CONTRACTOR SHALL ARRANGE TO HAVE THE SITE STAKED OUT ADEQUATELY IN ORDER TO ESTABLISH LOD, ELEVATION, PROPERTY OR REGULATORY BOUNDARIES, AND IDENTIFY THE PROPOSED LOCATION OF CRITICAL JETTY SECTIONS AND EXISTING STONES. IT WILL BE THE RESPONSIBILITY OF THE CONTRACTOR TO MAINTAIN STAKES THROUGH CONSTRUCTION AND ENSURE THE WORK IS COMPLETED CONSISTENT WITH PROJECT PLANS AND ASSOCIATED REGULATORY APPROVALS. TEMPORARY ACCESS AGREEMENT COORDINATION IS THE SOLE RESPONSIBILITY OF THE OWNER.
9. THE CONTRACTOR SHALL PROTECT ALL WETLANDS AND/OR ASSOCIATED COASTAL RESOURCES/FEATURES FROM INTRUSION BY TURBID WATERS, CONSTRUCTION DEBRIS, CONSTRUCTION EQUIPMENT, OR PERSONNEL DURING ALL WORK ACTIVITIES. UNDER NO CIRCUMSTANCES SHALL MATERIAL BE STORED ON THE SHORELINE OR COASTAL FEATURE, EXCEPT WHERE SHOWN AND/OR APPROVED.
10. DAMAGE TO ANY PROPERTY, PRIVATE OR OF PUBLIC TRUST, OCCURRING DURING THE CONSTRUCTION BY THE CONTRACTOR, SHALL BE THE RESPONSIBILITY OF THE CONTRACTOR AND SHALL BE REPAIRED TO THE SATISFACTION OF THE OWNER AT THE EXPENSE OF THE CONTRACTOR.
11. THE CONTRACTOR SHALL HAVE SPILL KIT PROVISIONS ON-HAND THROUGHOUT THE CONSTRUCTION PROCESS. PROVISIONS SHALL BE SIZED APPROPRIATELY FOR THE QUANTITY AND AMOUNT OF EQUIPMENT NECESSARY TO PERFORM THE WORK.
- 11.1. ACCESS SHALL OCCUR ABOVE THE REGULATORY MEAN HIGH WATER LINE AND LANDWARD OF THE AS-SHOWN LIMIT OF DISTURBANCE (LOD).
- 11.2. ACCESS UNDER NO CIRCUMSTANCES SHALL OCCUR OVER EXISTING VEGETATION OR DUNES AND SHALL OCCUR EXCLUSIVELY IN THE AREAS SHOWN HEREIN, OR AS APPROVED OTHERWISE.
12. RESTORATION:
 - 12.1. THERE IS NO INTENT TO DISTURB EXISTING COASTAL FEATURES, INCLUDING VEGETATION. CONSTRUCTION ACTIVITIES SHALL BE CONDUCTED IN SUCH A FASHION TO MINIMIZE DISTURBANCE TO COASTAL FEATURES WITHIN THE LIMIT OF DISTURBANCE.
 - 12.2. AS DIRECTED BY THE ENGINEER, THE CONTRACTOR SHALL RESTORE AREAS DISTURBED BY CONSTRUCTION TO PRE-CONSTRUCTION CONDITION, INCLUDING ACCESS, STAGING AND NATURAL AREAS.
13. IF REGULATED, CONSTRUCTION TO OCCUR OUTSIDE PIPING PLOVER NESTING SEASONS

EROSION AND SEDIMENT CONTROL AND LIMIT OF DISTURBANCE NOTES:

1. LAND AND VEGETATION DISTURBANCE SHALL BE KEPT TO A MINIMUM. DISTURBANCE SHALL BE AS SHOWN AND KEPT TO A MINIMUM WITHIN THE PROPOSED AREA OF CONSTRUCTION. ALL AREAS OUTSIDE THE LIMITS OF DISTURBANCE SHALL NOT BE DISTURBED.
2. THE CONTRACTOR SHALL ENSURE THAT ALL SOIL EROSION AND SEDIMENT CONTROL MEASURES, AND LIMIT OF DISTURBANCE MARKERS ARE PROPERLY INSTALLED PRIOR TO MOBILIZATION IN ACCORDANCE WITH THE LATEST RIDEN REGULATIONS AND TO THE SATISFACTION OF THE ENGINEER.
 - 2.1. WHEREVER POSSIBLE, EROSION CONTROL MEASURES SHALL BE INSTALLED PRIOR TO CONSTRUCTION ACTIVITIES.
 - 2.2. ADDITIONAL CONTROL MEASURES SHALL BE INSTALLED DURING CONSTRUCTION AS NECESSARY AND REQUIRED; THIS MAY INCLUDE, STAKED COIR LOG AND/OR WATTLE, TIMBER MUD MATS, AND BEACH COBBLE/ROCK (AT TRANSITION AREAS TO HEAVILY TRAFFICKED AREAS)
3. THE WORK IS GENERALLY WITHIN THE COASTAL FEATURE; AS SUCH:
 - 3.1. STOCKPILES AND DEPOSITION AREAS FOR CONSTRUCTION MATERIALS SHALL BE LOCATED AS SHOWN AND/OR AS APPROVED TO LIMIT DISTURBANCE. CONTRACTOR SHALL MAINTAIN AT LEAST 300 FEET OF HIGH DENSITY MARINE WATTLE TO BE ADJUSTED AND STAKED AS NECESSARY TO MINIMIZE IMPACTS CONSISTENT WITH THE NOTES AND DETAILS CONTAINED HEREIN.
 - 3.2. LIMIT OF DISTURBANCE MEASURES SHALL BE LOCATED AS SHOWN AND/OR AS APPROVED THROUGHOUT CONSTRUCTION ACTIVITIES.
 - 3.3. INSPECT ALL SEDIMENT AND EROSION CONTROL MEASURES, AND LIMIT OF DISTURBANCE EVERY DAY AND WITHIN 24 HOURS AFTER EVERY RAINFALL THAT PRODUCES RUNOFF, AS WELL AS WITHIN 24 HOURS OF ALL TIDAL OR COASTAL EVENTS BEYOND THOSE CONSIDERED NORMAL.
 - 3.4. MAINTAIN AND/OR REPLACE ALL EROSION AND SEDIMENT CONTROL, AND LIMIT OF DISTURBANCE MEASURES AS REQUIRED TO ASSURE PROPER FUNCTION.
 - 3.5. CONTRACTOR SHALL IMMEDIATELY REPAIR ANY AND ALL BREACHES IN SEDIMENT CONTROLS.
 - 3.6. CLEARING FOR AND INSTALLATION OF THE REQUIRED SEDIMENT CONTROL MEASURES SHALL BE COMPLETED AND INSPECTED PRIOR TO COMMENCING ANY OTHER LAND-DISTURBING ACTIVITY.



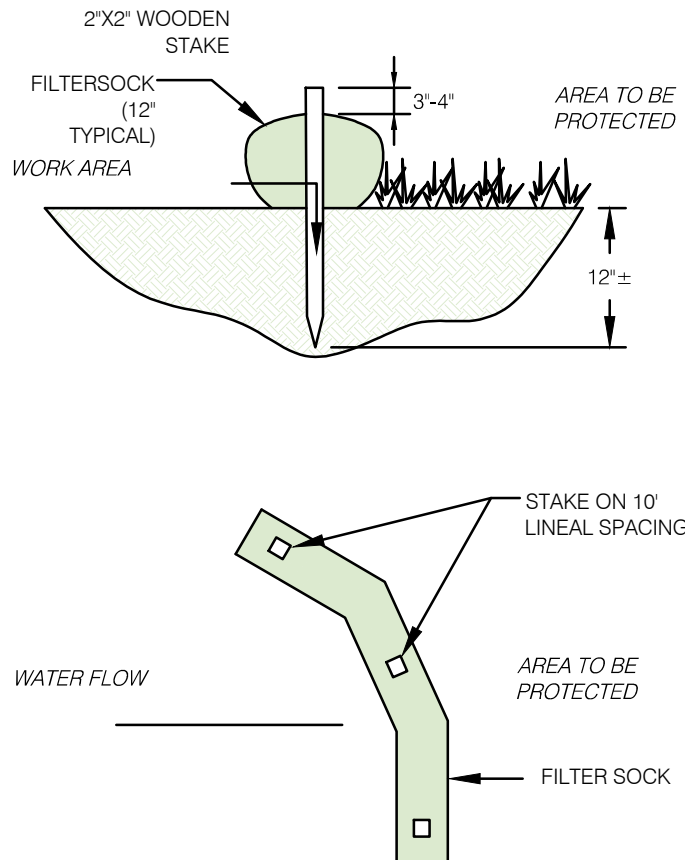
NOTES:

1. REQUIRED DEPTH OF CURTAIN MAY VARY

TURBIDITY BARRIER DETAIL

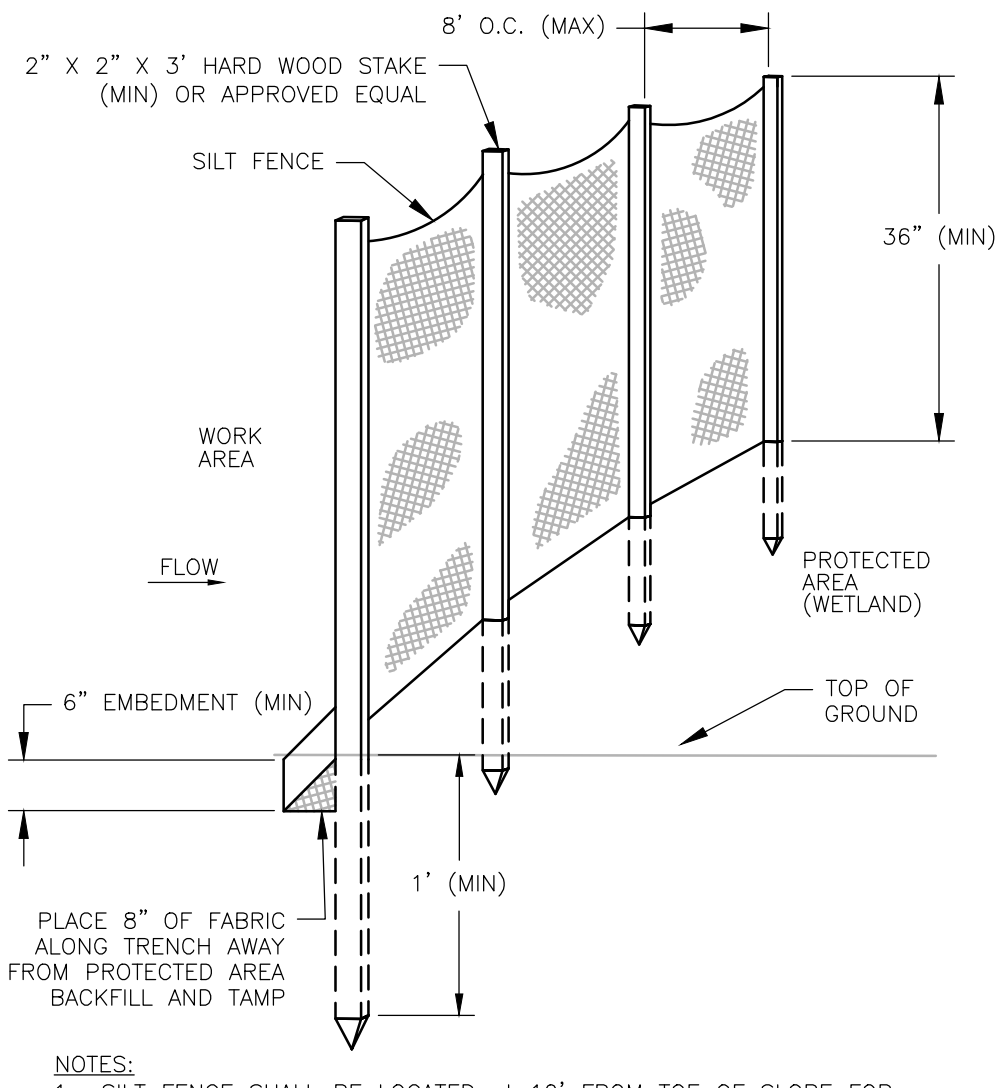
CA-BC-0206

- NOTES:
1. CURTAIN AND ANCHOR MUST RESIST EXPECTED WIND, WAVE, AND CURRENT ENVIRONMENTS AT THE SITE. CONTRACTOR TO SUBMIT PROPOSED WEIGHTED TURBIDITY CURTAIN FOR REVIEW/APPROVAL. THE WORK IS ANTICIPATED TO BE COMPLETED IN SECTIONS.
 2. THE CONTRACTOR SHALL CONFINE THE WORK AREA WITH SEDIMENT AND EROSION CONTROL MEASURES AS NECESSARY TO COMPLETE THE WORK AND IN ACCORDANCE WITH REGULATORY AUTHORIZATIONS.



HIGH DENSITY MARINE WATTLE DETAIL

NOT TO SCALE



NOTES:

1. SILT FENCE SHALL BE LOCATED AT 10' FROM TOE OF SLOPE FOR MAINTENANCE.
2. 8' WITH WIRE OR 6' WITHOUT WIRE (MAX).
3. WIRE FENCING - 6' MESH OPENING (MAX) AND 14 GAUGE (MIN).
4. MAINTAIN UNTIL UP-GRADIENT AREAS HAVE BEEN PERMANENTLY STABILIZED.

SILT FENCE

CA-BC-001



CONSTRUCTION ACCESS MAP

CHERENZIA & ASSOCIATES, LTD.
Civil Engineers
Land Use Planners
Environmental Engineers
www.cherenzia.com

99 Mechanic St.
Pawcatuck, CT 06379
Tel: 860.629.6590
Fax: 860.599.6690

P.O. Box 513
Westley, RI 02891
Tel: 401.596.7747

POSSIBLE PLANTINGS PER CRMC'S PLANT LIST

ZONE 1:

TREES - BLACK CHERRY (PRUNUS SEROTINA), SHADBUSH (AMELANCHIER CANADENSIS), NORTHERN ARROWWOOD (VIBURNUM DENTATUM)
SHRUBS - Highbush Blueberry (VACCINIUM CORYMBOSUM), NORTHERN BAYBERRY (MORELLA PENSYLVANICA), WILD ROSE (ROSA VIRGINIANA), INKBERY (ILEX GLABRA)
HERBS - SEASIDE GOLDENROD (SOLIDAGO SEMPERVIRENS), SWITCHGRASS (PANICUM VIRGATUM)

ZONE 2:

SHRUBS - Highbush Blueberry (VACCINIUM CORYMBOSUM), NORTHERN BAYBERRY (MORELLA PENSYLVANICA), WILD ROSE (ROSA VIRGINIANA)
HERBS - SEASIDE GOLDENROD (SOLIDAGO SEMPERVIRENS), BEACH GRASS (AMMOPHILA BREVIGULATA), NEW ENGLAND COASTAL SALT TOLERANT GRASS MIX

ZONE 3:

SHRUBS - NORTHERN BAYBERRY (MORELLA PENSYLVANICA), WILD ROSE (ROSA VIRGINIANA)
HERBS - BEACH GRASS (AMMOPHILA BREVIGULATA), NEW ENGLAND COASTAL SALT TOLERANT GRASS MIX

PLANTING DENSITY:

TREES - 12' ON CENTER, 1" CALIPER (20# CONTAINER OR LARGER)
SHRUBS - 6' ON CENTER, 5# CONTAINER
HERBS - PLUGS 3' ON CENTER OR 1# CONTAINER, 1' ON CENTER

FOR ALL PLANTINGS: OTHER THAN INKBERY "HEDGEROW", CLUSTER SAME SPECIES IN GROUPS. THE HEDGEROW WILL BE A CONTINUOUS LINE OF INKBERY ALONG THE COURSE SIDE OF THE RESTORATION, MAINTAINED AT 3 TO 5 FEET HIGH. APPLY A ONE-TIME APPLICATION OF 1 TO 2 INCHES OF NON-DYED, SHREDDED HARDWOOD AND/OR LIGHTLY STREWN HAY MULCH AROUND PLANTINGS.

PLAN REVISIONS

REV. NO.	DATE	DESCRIPTION	DWN BY	CHK BY

SCALE: AS NOTED
CA JOB # 224031
DATE: MAY 16, 2025

DRAWN BY: AKG
CHECK BY: SFC

ISSUED FOR REGULATORY REVIEW ONLY - NOT FOR CONSTRUCTION

DETAILS



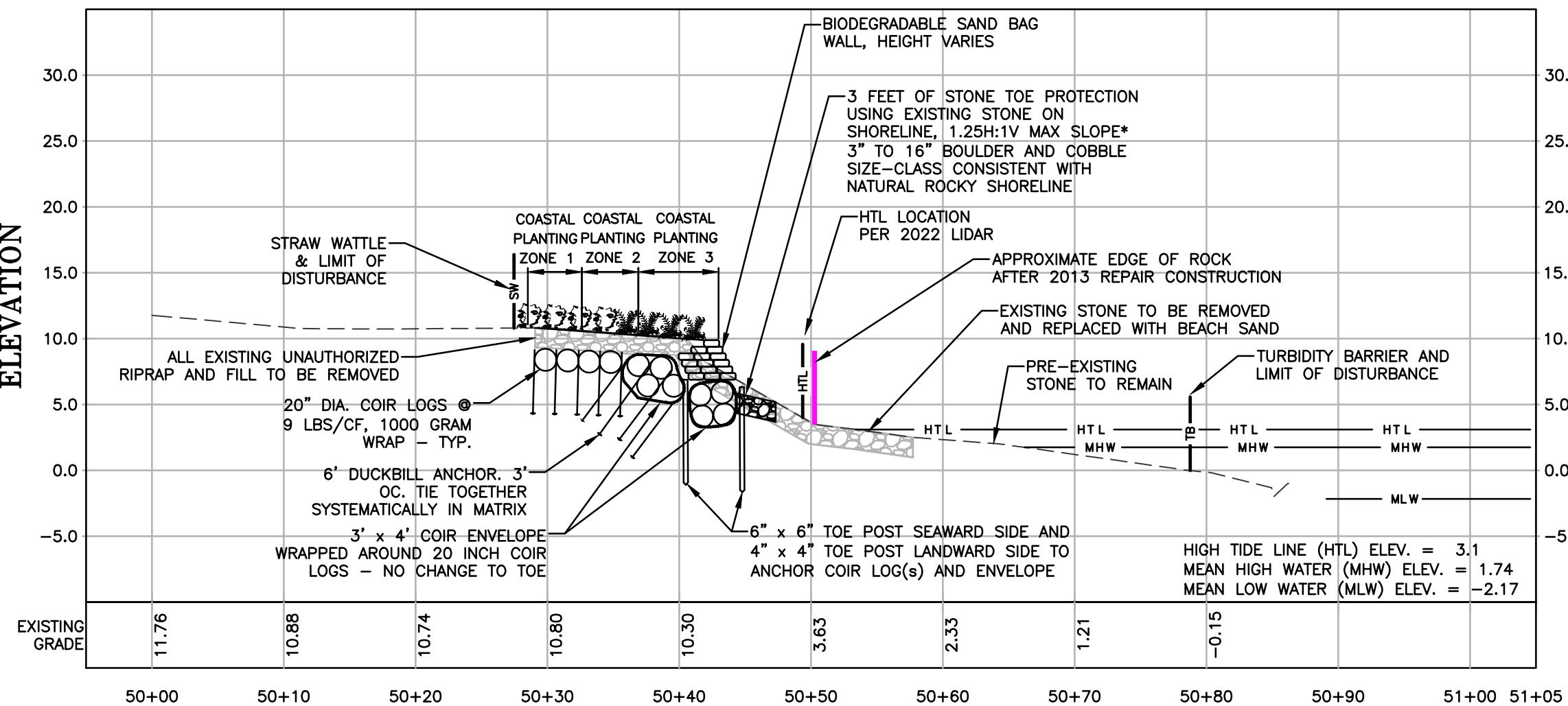
COASTAL RESTORATION PLAN
QUIDNESSETT COUNTRY CLUB
950 NORTH QUIDNESSETT ROAD
PLAT 167 LOT 2
NORTH KINGSTOWN, RHODE ISLAND

PREPARED FOR
QUIDNESSETT COUNTRY CLUB INC.



C-2

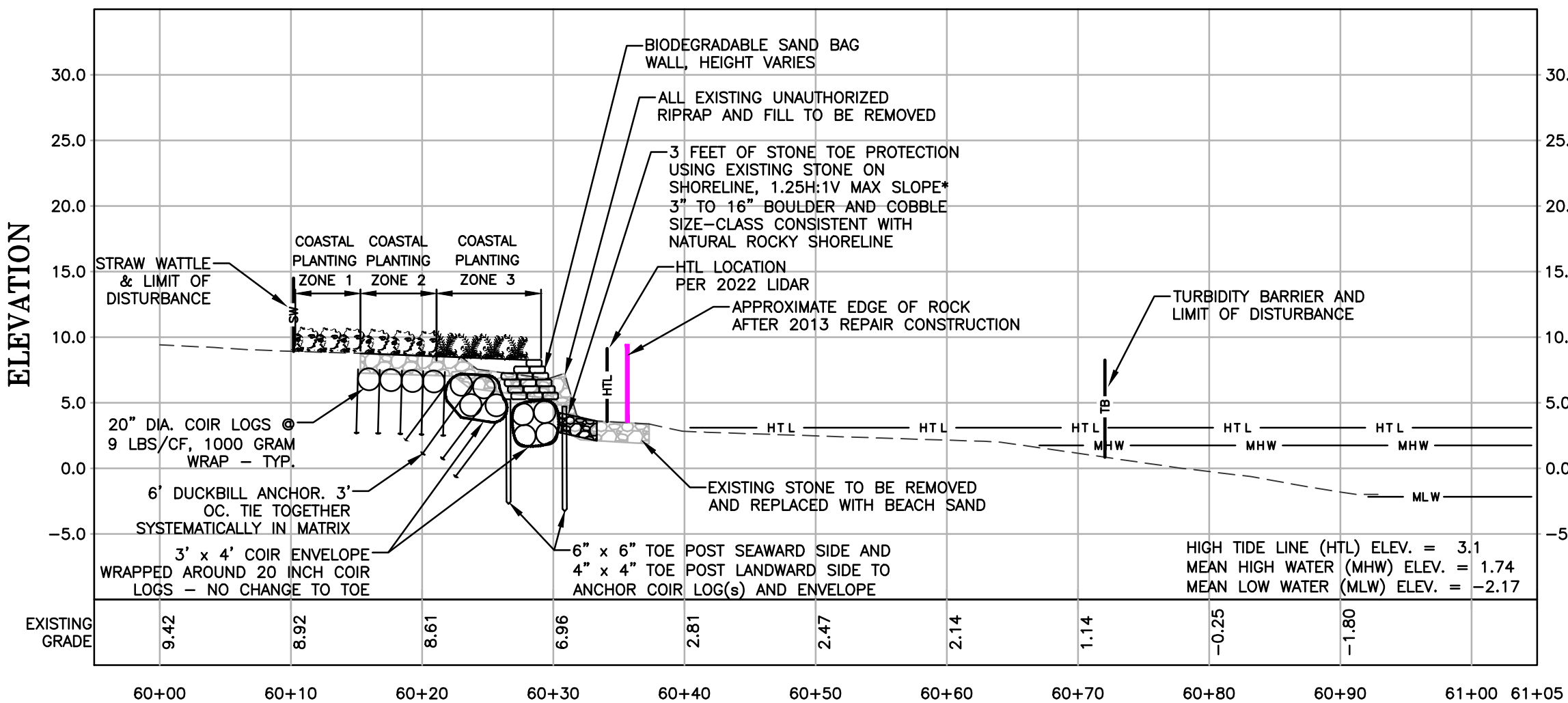
Sheet 2 of 2



PROFILE 5

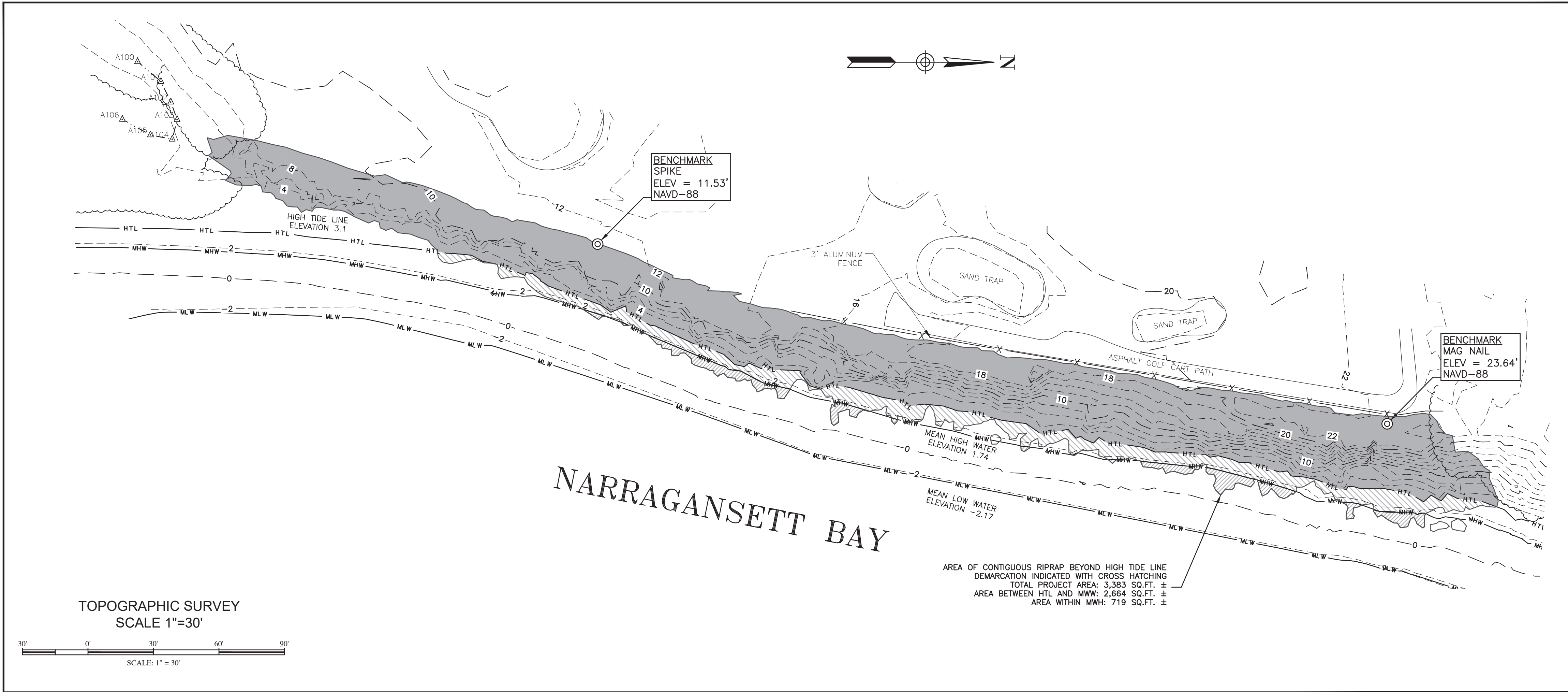
HORIZ. SCALE: 1" = 10'
VERT. SCALE: 1" = 10'

NOTE: ALL EXCESS MATERIAL SHALL BE DISPOSED OF IN ACCORDANCE WITH ALL LOCAL, STATE, AND FEDERAL REGULATIONS.

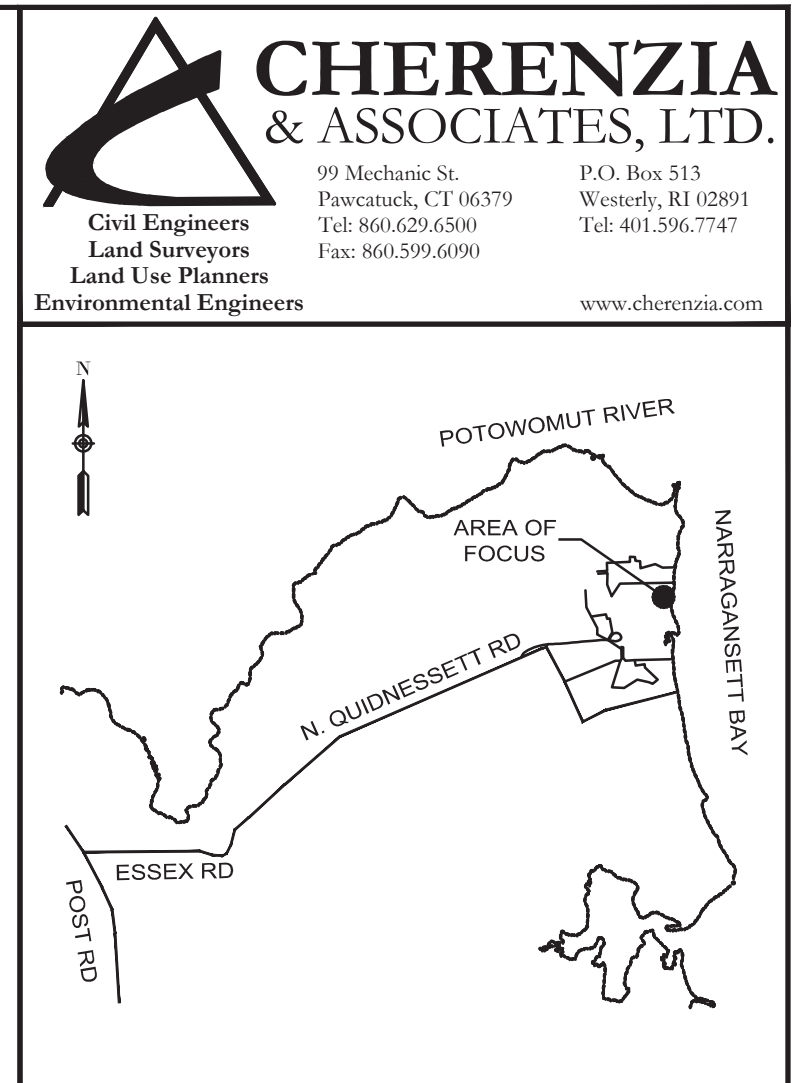


PROFILE 6

HORIZ. SCALE: 1" = 10'
VERT. SCALE: 1" = 10'



- LEGEND**
- 10' — MAJOR CONTOUR — 10' INTERVAL
 - - - 4 - - MINOR CONTOUR — 2' INTERVAL
 - X - FENCE LINE
 - ~~~~~ EDGE OF VEGETATION
 - MLW — MEAN LOW WATER
 - MHW — MEAN HIGH WATER
 - HTL — HIGH TIDE LINE
 - . . - DELINEATED WETLAND
 - [Hatched Box] RIPRAP (GRAPHICAL REPRESENTATION)
 - A103 Δ WETLAND DELINEATION FLAG



LOCATION MAP



PLAN REVISIONS				
REV. NO.	DATE	DESCRIPTION	DWN BY	CHK BY
1	7-3-24	HIGH TIDE LINE, WETLAND	MC	MC
1	7-23-24	UPDATED TOPOGRAPHY	JF	MC

SCALE: 1"=20'
CA JOB #224031
DATE: JUNE 7, 2024

DRAWN BY: JF
CHECKED BY: MAC

EXISTING CONDITIONS PLAN

DATA ACCUMULATION SURVEY

980 NORTH QUIDNESSETT ROAD
PLAT 167 LOT 2
NORTH KINGSTOWN, RHODE ISLAND

PREPARED FOR
QUIDNESSETT COUNTRY CLUB

MARK A. CASTELLANOS
No. 2511
PROFESSIONAL
LAND SURVEYOR

SV-1

NOTES:

- ELEVATIONS ARE REFERENCED TO THE NORTH AMERICAN VERTICAL DATUM OF 1988 (NAVD-88). VERTICAL CONTROL DERIVED FROM GNSS OBSERVATIONS UTILIZING THE CTDOT ACORN RTK NETWORK WITH CORS ID REFERENCE "URIL", KINGSTON, RI. & GEOID MODEL GEOID18.
- LIMITS OF FIELD TOPOGRAPHY SHOWN HEREON REPRESENTS INFORMATION GATHERED FROM FIELD SURVEYS CONDUCTED BY CHERENZIA & ASSOCIATES, LTD ON 05/14/24, 06/03/24, 07/17/24.
- SOURCE OF MEASUREMENT DATA IS BASED UPON CONVENTIONAL FIELD SURVEYING, GNSS OBSERVATIONS, AND THE USE OF UNMANNED AERIAL SYSTEMS LIDAR EQUIPPED WITH A HESAI PANDAR XT32 SCANNER.
- MEAN HIGH WATER AND MEAN LOW WATER ELEVATIONS WERE INTERPOLATED FROM NOAA TIDAL STATIONS 8454049 (QUONSET POINT) AND 8454578 (EAST GREENWICH) TIDAL EPIC 1983-2001. HIGH TIDE ELEVATION (3.1 FEET), REPRESENT THE PREDICTED HIGHEST TIDE OF THE 2024 CALENDAR YEAR, 10/18/2024, BASED ON PREDICTED TIDE ELEVATIONS FOR STATION QUONSET, PUBLISHED BY THE NOAA.

CERTIFICATION:

THIS SURVEY HAS BEEN CONDUCTED AND THE PLAN HAS BEEN PREPARED PURSUANT TO 435-RICR-00-00-1.9 OF THE RULES AND REGULATIONS ADOPTED BY THE RHODE ISLAND STATE BOARD OF REGISTRATION FOR PROFESSIONAL LAND SURVEYORS ON NOVEMBER 25, 2015, AS FOLLOWS:

TYPE OF SURVEY:
MEASUREMENT SPECIFICATION:
DATA ACCUMULATION-PLANIMETRICS
TOPOGRAPHY

CLASS III
CLASS T-2

THE PURPOSE FOR THE CONDUCT OF THE SURVEY AND THE PREPARATION OF THE PLAN IS TO SHOW EXISTING CONDITIONS OF THE SEAWALL SHOWN HEREON.

BY: Mark A. Castellanos
PLS SIGNATURE
MARK A. CASTELLANOS PLS #2511
PRINTED PLS NAME & LICENSE NO.
LS.000A133-COA



DiPrete Engineering

Christopher A. Duhamel, PE, PLS

Principal

Years Experience

30+

Professional Registrations

RI Professional Engineer,
Registration No. 5013

MA Professional Engineer,
Registration No. 34784

CT Professional Engineer,
Registration No. 14128

RI Professional Land Surveyor,
Registration No. 1844

MA Professional Land
Surveyor, Registration No.
45499

CT Professional Land
Surveyor, Registration No.
14128

RIDEM Class III OWTS
Designer, License No. D3011

RIDEM Class IV Soil Evaluator,
License No. D4006

Education

University of Rhode Island
Master of Science-Civil and
Environmental Engineering,
1996

Merrimack College Bachelor
of Science-Civil and
Environmental Engineering,
1980

Professional Affiliations

American Society of Civil
Engineers (ASCE)

RI Society of Professional
Land Surveyors (RISPLS)

RI Society of Environmental
Professionals (RISEP)

RI Board of Registration for
Professional Engineers

American Water Works NE/
RI Chapter

Profile

Chris has been an essential member of DiPrete Engineering from the beginning, with over 35 years of engineering and land surveying experience across Southern New England. As a Principal, Chris works directly with our clients and engineering team to identify cost-saving measures and engineering techniques that add value for his clients. He is also a technical advisor, coaching our engineering team to navigate regulatory challenges as quickly and efficiently as possible.

Work Experience

- Over 35 years of environmental planning and design including groundwater studies, hydrology studies, Phase I and II hazardous waste studies, landfill closures, environmental impact studies, and regulatory permitting.
- Over 35 years of extensive experience with site design including all types of utilities, grading, master planning, and environmental permitting.
- Soil evaluations, system design, and supervision of over 2,000 sewage disposal systems (SDS) in Massachusetts and onsite wastewater treatment systems (OWTS) in Rhode Island.
- Extensive permitting with municipal and state regulators, including the Coastal Resources Management Council (CRMC), the Rhode Island Department of Environmental Management (RIDEM), and the Rhode Island Department of Transportation (RIDOT).
- In addition to site construction projects, Mr. Duhamel has testified before the boards and commissions for most of the cities and towns in Rhode Island.



Project Experience

- Glenwood – Design and permitting for a 20-lot subdivision in Coventry, RI.
- Sherwood Village – Peer review services on behalf of the Town of Coventry, RI.
- Pine Ridge – Design and permitting for a 69-lot subdivision in Coventry, RI.
- Almy Dam – Surveying, engineering design, and specifications for federally-funded repairs to the existing high-hazard Almy Dam on behalf of the Town of Johnston, RI.
- URI Alton Jones Campus – Fire protection upgrades for the Whispering Pines Campground.
- Roger Williams University – Design for a 19,000 gallon per day OWTS repair in Bristol, RI.
- Love's Travel Stop – A proposed rest stop and gas station facility located in Hopkinton, RI.

Awards and Additional Experience

- RI Society of Professional Engineers – Engineer of the Year, 2008.
- Town of Westerly, RI - Planning Board – Member and Chairman, 1989- 2002.
- Town of Westerly, RI - Town Council – Member and President, 2002- 2016; 2018- 2022.
- Washington County, RI - Regional Planning Council – President, 2002- 2016.
- RI Board of Registration for Professional Engineers – Member and Chairman, 2008- Present.
- RIDEM Stormwater Advisory Committee – Member.
- Coastal Resources Management Council – Low Impact Development Master Designer.



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

IN THE MATTER OF:

QUIDNESSETT COUNTRY CLUB

CRMC File No.: 23-0185

**QUIDNESSETT COUNTRY CLUB'S
MOTION TO ASSIGN TO A HEARING OFFICER**

Pursuant to R.I. General Laws §§ 46-23-7.1(2) and 46-23-20, Quidnessett Country Club (“QCC”) respectfully requests that the Coastal Resources Management Council (“CRMC”) assign the above matter to a hearing officer for an administrative hearing and appropriate prehearing procedures. As discussed below, QCC is entitled to proceed before a hearing officer pursuant to CRMC’s enabling act. Accordingly, for the reasons stated, QCC respectfully requests that CRMC grant this motion.

I. BACKGROUND

QCC owns a 71-acre property at 950 N. Quidnessett Road, North Kingstown, Rhode Island (“QCC Property”). The QCC Property sits along Narragansett Bay. Since about 1959, the QCC Property has operated as a private golf and country club. QCC offers its members and the public extensive amenities, including a banquet and function facility, a restaurant, and a multi-pool complex. The QCC Property also houses 17 high-density residential buildings with 46 units.

The signature and foundational feature of the QCC Property is the 18-hole, par 72, 6,500-yard golf course designed by world renowned golf course architect Geoffrey Cornish in the late 1950s. Over the years, QCC’s golf course has hosted thousands of golf tournaments, including professional and amateur golf championships, as well as frequent non-profit, charity golf tournaments. The course’s signature hole is the 14th hole, located directly along Narragansett



Bay with magnificent views to the north and east. The fairway and green of the 14th hole, along with the golf cart path, run along and directly abut the QCC Property's northeastern shoreline bluff.

QCC previously had installed shoreline protection consisting of large coir envelopes – referred to as burritos – to protect its property and the golf course. In December 2022, the burritos were washed away completely by intense coastal storms. The land immediately adjacent to the 14th hole subsequently collapsed. To protect against further damage to the land and the threatened loss of the 14th hole, QCC began implementing replacement shoreline protections in January 2023.

On August 21, 2023, CRMC's Deputy Director issued a Notice of Administrative Fine to QCC in connection with these shoreline protections. On August 28, 2023, CRMC staff issued a Cease and Desist Order (No. 23-0185) purportedly as of August 21, 2023, and the Deputy Director issued two additional Notices of Administrative Fine. QCC did not receive the Cease and Desist Order or the Notices of Administrative Fine until September 19, 2023.

QCC contested the Cease and Desist Order and Notices of Administrative Fine. It timely filed a written request for an administrative hearing pursuant to R.I. Gen. Laws § 46-23-7.1(2). QCC reiterated its request for an administrative hearing several times. Most recently, QCC requested an administrative hearing in a letter dated May 7, 2025.

In light of CRMC's continued failure to assign this matter to a hearing officer in accordance with the enabling act, QCC now brings this Motion to Assign.

II. LEGAL STANDARD AND ARGUMENT

R.I. General Laws § 46-23-20 states that, "All contested cases, *all contested enforcement proceedings*, and all contested administrative fines *shall* be heard by the administrative hearing



officers.” R.I. Gen. Laws § 46-23-20 (emphasis added). The role of the hearing officer is to “make written proposed findings of fact and proposed conclusions of law,” which the hearing officer then submits to the Council for review. R.I. Gen. Laws § 46-23-20.4. The hearing officer also has authority and discretion to implement appropriate prehearing procedures. *See* R.I. Gen. Laws § 46-23-20.3.

Additionally, R.I. General Laws § 46-23-7.1(2) allows a party in receipt of a Notice of Administrative Fine to file a written request for a hearing before a hearing officer within twenty-one day of receipt of the notice. R.I. Gen. Laws § 46-23-7.1(2). The statute further provides that the request for a hearing stays the accrual of any additional daily penalties until the Council issues a final order. *Id.*

In this case, QCC has contested the Cease and Desist Order, making this a contested enforcement proceeding. QCC also has contested the Notices of Administrative Fines and timely requested an administrative hearing. Accordingly, under the clear statutory language, QCC is entitled to have the matter assigned to a hearing officer to conduct appropriate fact finding and make proposed findings of fact and conclusions of law. Section 46-23-20 does not allow for the full Council to hear a contested enforcement matter prior to receiving such proposed written findings and conclusions. *See also Dumplings Ass’n, Inc. v. Coastal Resources Mgmt. Council*, C.A. No. PC-2021-00296 (R.I. Super. Ct. Jan. 22, 2025) (Lanphear, J.) (vacating CRMC decision for failure to assign matter to a subcommittee pursuant to the Management Procedures). QCC therefore asks CRMC to grant its motion.

III. CONCLUSION

For these reasons, Quidnessett Country Club respectfully requests that the Coastal Resources Management Council grant its motion to assign this matter to a hearing officer.



Respectfully submitted:
Quidnessett Country Club

By and through its attorneys,

/s/ Jennifer Cervenka

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/s/ Robin Main

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Providence, RI 02903
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rmain@hinkleyallen.com

Dated: May 5, 2025



CERTIFICATE OF SERVICE

Coastal Resources Management Council
Oliver H. Stedman Government Center
4808 Tower Hill Road, Suite 3
Wakefield, RI 02879-1900

Anthony DeSisto, Esq.
Anthony DeSisto Law Associates
450 Veterans Memorial Parkway, Suite 103
East Providence, RI 02914

I hereby certify that I sent the within document via email and via regular mail in quadruplicate to the CRMC in Wakefield, Rhode Island on May 5, 2025.

/s/ Jennifer Cervenka

