

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



**QUIDNESSETT COUNTRY CLUB
ENFORCEMENT FILE 23-0185**

Enforcement Report Contents

A. File Summary.....	1
B. Recommendations.....	1
C. Programmatic Violations.....	2
D. Permit and Application History.....	3
E. Discussion of Restoration Requirements.....	3
F. Additional Programmatic Considerations.....	5
G. Exhibits.....	G1
1. “CRMC Emergency Assent Submission, Site Plan, Quidnessett Country Club...”, dated 3/12/13, by DiPrete Engineering and stamped CRMC approved 3/19/13	
2. “Previous Approved Plan Overlay, Quidnessett Country Club...” by Cherenzia & Associates, Ltd., last revised 2/3/25	
3. Correspondence to Brian Harrington from Jennifer Cervenka dated August 16, 2024	
H. Attachments.....	H1
1. Cease & Desist Order 23-0185, dated August 28, 2023	
2. \$10,000 Notice of Administrative Fine, dated August 21, 2023	
3. \$10,000 Notice of Administrative Fine, dated August 28, 2023	
4. \$10,000 Notice of Administrative Fine, dated August 28, 2023	
I. Photos.....	I1
1. Google Earth Image: June 7, 2022	
2. Photo taken by Brian A. Harrington, August 18, 2023	
3. Google Earth Image: September 17, 2023	
4. Proposed Toes of Features, Google Earth Image: April 2024	
J. Appendices.....	J1
1. Abridged Enforcement Chronology	
2. Correspondence	
3. Proposed Restoration Plans (5)	

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

RE: CRMC Enforcement File 23-0185

LOCATION: Plat 167, Lot 2, 950 North Quiddnessett Road, North Kingstown, RI

OWNER: Quidnessett Country Club, Inc.

A. FILE SUMMARY

- In response to a complaint, on August 18, 2023, CRMC staff inspected Quidnessett Country Club, and found an unauthorized riprap revetment, unauthorized cutting of vegetation on a coastal feature, and unauthorized filling of tidal waters. These unauthorized activities took place along CRMC designated Type 1 waters and are prohibited by the Rhode Island Coastal Resources Management Program (RICRMP). On August 28, 2023, Cease & Desist Order 23-0185, and three \$10,000 Notices of Administrative Fines (Section H, Attachments), were issued to Quidnessett Country Club, Inc. On October 10, 2023, the three \$10,000 Notices of Administrative Fines were appealed by Quidnessett Country Club Inc.
- On May 22, 2024, a letter was sent to Quidnessett Country Club, Inc., detailing restoration requirements and requiring that a complete acceptable restoration plan be submitted by June 21, 2024. The proposed restoration plan was required to include the removal of all unauthorized riprap and fill, stabilization of the coastal feature native shrub and tree plantings, of appropriate size and density, throughout all areas of previously vegetated natural buffer zone.
- To date, five (5) proposed restoration plans have been submitted and determined to be unacceptable due primarily to the proposed location of the “toe of berm”.

B. RECOMMENDATIONS

Enforcement staff recommend that the Council require Quidnessett Country Club Inc.:

- To remove all unauthorized riprap and fill within 60 days.
- To submit a complete, acceptable restoration plan for stabilizing the site using nonstructural means within 30 days. The restoration plan shall include the following:
 - The “toe of berm” be no further seaward than the blue line labeled, "approximate toe of coir envelope" as shown on the plan titled "Previous Approved Plan Overlay", dated revised February 3, 2025. (Exhibit 2).
 - Deep rooted native vegetation of appropriate size and density throughout all areas of previously vegetated natural buffer zone.
- Restore and stabilize the site in conformance with the approved restoration plan within 90 days.

C. PROGRAMMATIC VIOLATIONS

General

- Redbook (650-RICR-20-00-1) §1.1.3(A)(1) “All developments or operations within, above or beneath the tidal waters below the mean high water mark extending out to the extent of the state’s jurisdiction in the territorial sea, and those occurring on coastal features or within all directly associated contiguous areas which are necessary to preserve the integrity of coastal resources, or any portion of which extends onto the most inland shoreline feature or its two hundred (200) foot contiguous area, or as otherwise set out in the Coastal Resources Management Program, require a Council Assent.
- Redbook (650-RICR-20-00-1) §1.1.4(A)(1) “A Council assent is required for any alteration or activity that are proposed for:
 - a. Tidal waters within the territorial seas (including coastal ponds, some of which are not tidal but which are coastal waters associated with a barrier beach system, and are physiographical features);
 - b. Shoreline features; and
 - c. Areas contiguous to shoreline features.”

Unauthorized earthwork (filling, removing, and grading) on a coastal feature

- Redbook (650-RICR-20-00-1) §1.3.1(J)(3)(a) “Filling in Type 1 and 2 waters is prohibited.”
- Redbook (650-RICR-20-00-1) §1.3.1(B)(2)(a) “Filling, removing, or grading is prohibited on beaches, dunes, undeveloped barrier beaches, coastal wetlands, cliffs and banks, and rocky shores adjacent to Type 1 and 2 waters unless the primary purpose of the alteration is to preserve or enhance the feature as a conservation area or natural buffer against storms.”
- Redbook (650-RICR-20-00-1) §1.3.1(B)(2)(b) “Filling, removing, or grading is prohibited on beaches, dunes, undeveloped barrier beaches, coastal wetlands, cliffs and banks, and rocky shores adjacent to Type 1 and 2 waters unless the primary purpose of the alteration is to preserve or enhance the feature as a conservation area or natural buffer against storms.”

Unauthorized construction of a riprap revetment on a coastal feature

- Redbook (650-RICR-20-00-1) §1.1.5(A), Activity Matrix Type 1 Waters: Filling, Removing and Grading and Structural Shoreline Protection are prohibited on Headlands, Bluffs and Cliffs, and Rocky Shores.
- Redbook (650-RICR-20-00-1) §1.2.1(B)(2)(c) “In Type 1 waters, activities and alterations including dredging, dredged materials disposal, and grading and excavation on abutting shoreline features are all prohibited unless the primary purpose of the alteration or activity is to preserve or enhance the area as a natural habitat for native plants and wildlife or a beach renourishment/ replenishment project. Structural shoreline protection facilities shall not be permitted to preserve or enhance these areas as a natural habitat or to protect the shoreline feature.”

- Redbook (650-RICR-20-00-1) §1.3.1(G)(3)(a) “The Council shall prohibit new hybrid and structural shoreline protection on barriers classified by the CRMC as undeveloped, moderately developed, and developed as well as shorelines abutting Type 1 waters, unless the shoreline is determined by the CRMC to be a manmade shoreline as defined within § 1.1.2 of this Part or is permissible under § 3.4.12 of this Subchapter.”
- Redbook (650-RICR-20-00-1) §1.3.1(G)(3)(c) “Filling on a coastal feature or tidal waters beyond that which is consistent with § 1.3.1(G)(5)(a) of this Part is prohibited.”
- Redbook (650-RICR-20-00-1) §1.3.1(G)(3)(d) “Shoreline protection is prohibited when proposed to be used to regain property lost through historical erosion or storm events, unless the project is a marsh sill designed for wave attenuation as part of a marsh creation, enhancement, or restoration project.”

D. PERMIT AND APPLICATION HISTORY

- 1991-11-054** Maintenance Certification issued to relocate displaced riprap at toe of bank and on adjacent beach area and on adjacent beach area to slope of coastal bank.
- 2000-02-043** Preliminary Determination issued regarding the construction of residential condominium units.
- 2006-05-067** Assent issued to construct non-structural shoreline protection.
- 2010-04-115** Maintenance Certification issued to repair and replace existing septic system.
- 2012-05-071** Application submitted to “Construct and maintain a steel or vinyl sheetpile retaining wall, twenty-five feet (25') landward of the (Type 1) coastal feature, approximately 350 linear feet, total length. The project requires a 25' setback variance to RICRMP Section 140.B & C, where a 50' setback is required.”
- 2013-03-133** Emergency General Permit issued March 19, 2013, to undertake storm erosion repairs of coastal bluff to include installation of sand filled coir envelopes, stone toe protection using existing stone on shoreline, beach nourishment with beach grass plantings and beach grass slope plantings with native shrubs at bluff crest.

E. DISCUSSION OF RESTORATION REQUIREMENTS

An acceptable restoration plan must include the following:

1. Removal of all unauthorized riprap and fill
2. Nonstructural stabilization of the coastal feature (bluff)
3. Proposed native shrub and tree plantings, of appropriate size and density, throughout all areas of previously vegetated natural buffer zone

These three elements were specifically requested in correspondence to Jennifer Cervenka dated May 22, 2024, August 2, 2024, September 3, 2024, October 11, 2024, November 22, 2024, February 25, April 10, 2025 and May 9, 2025.

1. Removal of all unpermitted riprap and fill

New hybrid and structural shoreline protection are prohibited on shorelines abutting Type 1 waters (Redbook §1.3.1(G)(3)(a)). Filling on a coastal feature abutting Type 1 waters is prohibited (Redbook §1.3.1(G)(3)(c)). Grading and excavation of shoreline features abutting Type 1 waters is prohibited (Redbook §1.2.1(B)(2)(c)). Filling in Type 1 waters is prohibited Redbook §1.3.1(J)(3)(a). Accordingly, all unauthorized riprap and fill must be removed.

In determining the location and footing of the restored feature, staff has relied upon CRMC assent A2013-03-133 and the associated approved plans (“CRMC Emergency Assent Submission, Site Plan, Quiddnessett Country Club...”, dated 3/12/13, by DiPrete Engineering and stamped CRMC approved 3/19/13), hereinafter referred to as the DiPrete Plan (Exhibit 1). This assent, issued following Super Storm Sandy, authorized “storm erosion repairs of coastal bluff to include installation of sand filled coir log envelopes, stone toe protection using existing stone on shoreline, beach nourishment with beach grass plantings and beach grass slope plantings with native shrubs at bluff crest” This assent is the most recent granted to QCC.

The DiPrete Plan includes a plan view of the inland edge (bluff crest) and seaward extent of the bluff, both shown as red dotted lines, and a cross-sectional view showing the vertical location and composition of the restored bluff and authorized stone toe protection.

On January 24, 2025, CRMC staff and representatives of QCC met to discuss the acceptable location of the toe of the restored bluff. In that meeting, CRMC staff and representatives of QCC agreed that the lateral extent depicted in the plan view and the dimensions noted in the cross-sectional view of the DiPrete Plan were inconsistent. The cross-section included a note that the sand filled coir envelopes were to be “*stacked at a 2:1 slope.*”

CRMC requested, and QCC prepared a conceptual plan (Exhibit 2) showing the build out of the cross-section (the blue line in exhibit 2), to see if it would match what was built. It did not. The 2013 as-built toe was farther seaward than the cross-section would allow and in some areas extended below the mean high water and high tide lines (the magenta line in exhibit 2).

It bears acknowledging that the DiPrete Plan “Bluff Restoration Notes” required weekly monitoring reports during construction and a final compliance report with photos following completion of the bluff repair. In spite of a thorough search of CRMC files, there is no record that the CRMC received nor that the QCC submitted required monitoring reports or a post-construction survey of the completed work.

Each of the five proposed restoration plans submitted relies on the as-built rather than approved location of the toe of the bluff. Programmatically, however, the toe of the restored feature can extend no farther seaward than that which was authorized by CRMC assent 2013-03-133 (see Redbook §1.2.1(B)(2)(c), §1.3.1(B)(2)(a), §1.3.1(G)(3)(c)). Accordingly, the toe of the restored

bluff can extend no farther seaward than the location of cross-section shown on the DiPrete Plan and depicted as the blue line in exhibit 2.

2. Nonstructural stabilization of the coastal feature (bluff)

New hybrid and structural shoreline protection are prohibited on shorelines abutting Type 1 waters (Redbook §1.3.1(G)(3)(a)). Filling on a coastal feature abutting Type 1 waters is also prohibited (Redbook §1.3.1(G)(3)(c)). Therefore, the restored bluff must be stabilized using nonstructural measures.

Nonstructural shoreline protection is defined as “practices that use only native or sustainable vegetation and biodegradable materials” (Redbook §1.1.2(97)). The slope of the restored bluff must be graded back to a stable slope that will diminish the risks of under-cutting and mass-wasting and allow for planting. A slope of 2H:1V is the minimum standard for permits seeking nonstructural shoreline protection (Redbook §1.3.1(G)(5)(h)). It is staff opinion that a shallower slope of 3H:1V would provide even further stability of the feature (§1.3.1(B)(3)(a)(1)).

3. Proposed native shrub and tree plantings, of appropriate size and density, throughout all areas of previously vegetated natural buffer zone

Sediment on a bluff is further stabilized with deeply rooted vegetation. In addition to providing habitat benefits for coastal wildlife, the requirement for vegetation serves a structural purpose as well. Proposed native plantings, including species, density, and location must be shown on the proposed plan (Redbook §1.1.11(B)(4)). Recommended density, coverage, and minimum planting size can be found in the “Coastal Buffer Zone Planting Guide,” revised 2008. Appropriate native plants proposed must be listed in the “Rhode Island Native Plant Guide,” revised 2024.

F. ADDITIONAL PROGRAMMATIC CONSIDERATIONS

1. Water Type and Shoreline Characteristics

The QCC shoreline, contiguous shoreline areas, and adjacent tidal waters are classified as Type 1 Conservation areas (§1.2.1(B)) and identified on North Kingstown (north) Water Type Classification Map (§1.6 (I) (5)). Prior to the unauthorized stone fill, the QCC shoreline consisted of a coastal bluff and rocky beach. The shoreline exemplifies a Type 1 shoreline as it has historically retained natural habitat on the rocky beach and adjacent bluff with native vegetation. Additionally, the shoreline is bounded by an open space easement to prevent further development and protect scenic values of the area (see CRMP § 1.2.1 (B)(1)(a) (b)(c)).

The QCC shoreline is part of a larger segment of predominantly intact natural shoreline stretching from Calf Pasture Point in North Kingstown to Southwestern side of East Greenwich Cove in East Greenwich. Additionally, this shoreline is included within the Department of the

Interior's U.S. Fish & Wildlife (USFWS) designation of a Coastal Barrier Resource System (CBRS) identified as unit D02B. The CBRS is a system of protected coastal areas that were identified as important coastal barriers that protect properties further inland from flood damage and provide protective habitat for aquatic plants and animals.

The tidal areas associated with this shoreline are also located within the Rhode Island Department of Environmental Management's High Banks Shellfish Management area. The Management Area is designated to better manage and promote sustainable shellfish resources. It is CRMC policy to "preserve and protect Type 1 waters from activities and uses that have the potential to degrade scenic, wildlife, and plant habitat values, or which may adversely impact water quality or natural shoreline types." CRMP (§1.2.1(B)(2)). Structural shoreline protection is prohibited in Type 1 waters (CRMP§ 1.1.5(A)).

2. The Role of Erosion

In the August 16, 2024, letter to CRMC (Exhibit 1), QCC stated "*the large-scale non-structural shoreline protection installed by the Club in 2013 has failed to protect the Club's golf course from rapid erosion, even with annual maintenance... Due to the shoreline's highly erosive conditions, there is no nonstructural design that will provide true stabilization of the bluff.*" (Exhibit 3)

The recommended Order to Restore is not an order to stabilize the bluff in its current position in perpetuity, nor is it an order to stop all erosion. Rather, it is a requirement to restore the structure and function of the coastal feature after direct interference with the natural processes— in this case, the unauthorized placement of fill in the form of dumped rock material and the required removal.

Erosion is the process by which sediment is removed from one location and transported to another. In this case, the erosion is from the coastal bluff, and the sediment is transported to nearby coastal waters. The eroded sediment then either settles out of suspension onto the floor of the bay, which contributes minerals and nutrients to benthic ecosystems, or is transported to nearby coastal ecosystems, including marshes and beaches.

It is not a goal of the CRMP to stop erosion; rather, the CRMP repeatedly acknowledges that erosion must be managed in a balanced approach that considers both the provenance and final destination of the eroded sediment. This is perhaps best summarized in the CRMP Policy for coastal headlands: "*In considering applications for permits for erosion control measures, the Council shall weigh the impact of the proposed structure on the supply of sediments to nearby beaches. Where the Council finds that a substantial reduction or elimination of sediment is likely to result, and that natural erosional processes affecting the nearby beach will thereby be accelerated, it shall deny an application for Assent*" (§1.2.2(D)(1)(h)).

Staff would also like to note that the language throughout the CRMP does not imply that erosion can be stopped entirely. Rather, the goal is simply to mitigate adverse impacts. For example, non-structural shoreline protection is defined as “*practices that use only native or sustainable vegetation and biodegradable materials... the purpose or effect of which is to **reduce** the erosion of coastal features*” (§1.1.2(97), emphasis added). Furthermore, in regard to policies for coastal bluffs, “*the Council shall encourage the use of nonstructural methods to **diminish** frontal erosion associated with coastal cliffs and bluffs adjacent to Type 1 and Type 2 waters*” (§1.2.2(D)(1)(f), emphasis added).”

3. Coastal Ecosystem Impacts

Erosion in one location leads to accretion in another. Narragansett Bay modelling efforts show general southward currents in this area, which can result in a longshore drift of sediment from north to south parallel to the shoreline. Sediment eroded from the bluff provides the sediment source responsible for the creation, preservation, and continued existence of adjacent coastal systems. If the unauthorized stone fill is not restored the existing coastal beach south to the mouth of Tibbets Creek may become sediment starved in turn.

A coastal salt marsh exists at the mouth of Tibbets Creek immediately south of unauthorized dumped stone. Tidal marshes are one of the most susceptible ecosystems to climate change and sea level rise (SLR). To respond to SLR, tidal marshes must either retreat or naturally build elevation through accumulation of sediment. In the case of the tidal marshes near Tibbets Creek, upland migration is limited due to the existing golf course, and elevation gain through sediment transport is dependent on the natural erosion of the coastal bluff and longshore drift of sediment from the north (§1.8(A)). If this sediment source is reduced (i.e., if the dumped stone remains and the sediment of the bluff is impounded), the coastal marsh is unlikely to build elevation at the same rate to compensate for effects of SLR. Therefore, the long-term resiliency of the coastal marsh will be reduced, and habitat loss may accelerate (§1.8(N)).

4. Lateral Access

Beyond the adverse impacts to habitat, wildlife, and sediment supply, the effects to lateral access must also be considered. As sea levels rise, the adjacent uplands of unarmored coasts naturally erode, which allows for the intertidal zone to shift inland. However, if the adjacent uplands are completely hardened, there is no ability for the intertidal zone to shift, and the shore zone is squeezed. This CRMC Shoreline Change (Beach) Special Area Management Plan (Beach SAMP), explicitly states that “*hardening of the shoreline can create barriers to public access along lateral access ways as erosion takes place*” (§5.2, pg. 5-16) and that “*structural shoreline protection measures can have a broad range of negative impacts on adjacent beaches and properties, on the natural environment, and on shoreline public access*” (§7.2.8, pg. 7-20).

The Council has specific regulations that prioritize lateral access along the shore; in regards to projects that may impact access, *“it is the Council’s policy to require applicants to provide, where appropriate, on-site access of a similar type and level to that which is being impacted as the result of a proposed activity or development project”* (§1.3.6(A)(3)). As such, any restoration of the site must allow for comparable access along the shore to that which existed prior to the violation.

G. EXHIBITS

- 1. “CRMC Emergency Assent Submission, Site Plan, Quidnessett Country Club...”, dated 3/12/13, by DiPrete Engineering and stamped CRMC approved 3/19/13**
- 2. “Previous Approved Plan Overlay, Quidnessett Country Club...” by Cherenzia & Associates, Ltd., last revised 2/3/25**
- 3. Correspondence to Brian Harrington from Jennifer Cervenka dated August 16, 2024**

Nº 1018



STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

Permit Type: HU-F

2013-03-133

COASTAL RESOURCES MANAGEMENT COUNCIL

Oliver H. Stedman Government Center

Tower Hill Road

Wakefield, R.I. 02879

Phone: 277-2476
783-3370

EMERGENCY GENERAL PERMIT

OWNER: QUIDNESSETT COUNTRY CLUB, INC.

LOCATION: 950 NORTH QUIDNESSETT ROAD, N.K (P 167, L 2)

INVESTIGATOR: DAVE REIS

DATE: 3/19/13

TIME: OFFICE REVIEW

TITLE: SUPERVISING ENVIRONMENTAL SCIENTIST

DESCRIPTION OF WORK: UNDERTAKE STORM EROSION REPAIRS OF COASTAL BLUFF TO INCLUDE INSTALLATION OF SAND FILLED COIR ENVELOPES, STONE TOE PROTECTION USING EXISTING STONE ON SHORELINE, BEACH NOURISHMENT WITH BEACH GRASS PLANTINGS AND BEACH GRASS SLOPE PLANTINGS WITH NATIVE SHRUBS AT BLUFF CREST.

PHOTOS/DESCRIPTION: SEVERAL SITE INSPECTIONS WERE UNDERTAKEN BY CRMC STAFF TO DOCUMENT POST-STORM & PRE-STORM CONDITIONS (SEE CRMC FILE NO 2012-05-071)

WORK APPROVED OR REJECTED (circle one)

CONDITIONS OF APPROVAL: ALL WORK MUST BE CONSISTENT WITH THE SUBMITTED PLAN ENTITLED: "CRMC EMERGENCY ASSENT SUBMISSION, SITE PLAN, QUIDNESSETT COUNTRY CLUB," DATED 3/12/13, BY DITRETE ENGINEERING AND STAMPED CRMC APPROVED 3/19/13. SAND FILL MUST BE TEXTURALLY COMPATIBLE WITH BEACH SAND.

NOTE: ALL WORK SUBJECT TO RESTRICTIONS/REQUIREMENTS AS SPECIFIED ON THE ATTACHED PERMIT CONDITIONS.

REASONS FOR REJECTION (if rejected): _____

THIS APPROVAL VALID FOR 90 DAYS OF INSPECTION NOTED ABOVE; IF ALL WORK IS NOT COMPLETED WITHIN THIS PERIOD, A NEW APPLICATION TO THE CRMC SHALL BE REQUIRED.

61(2-613)

Emergency General Permit
Protection of Storm Eroded Coastal Bluffs with Available Beach Stone and
Non-structural Shoreline Protection Measures and Native Plantings
HU-F

This emergency permit authorizes the protection of storm-eroded coastal bluffs with a combination of existing stone, which was either eroded from the coastal bluff by the storm or otherwise available on the adjacent beach/shorefront, and includes the use of nonstructural shoreline protection measures and native plantings.

Definitions:

Existing Beach Stone – Rocks and cobble generally less than 2 cubic feet in size that are within 35 feet of the eroded bluff and above mean high water.

Non-structural Shoreline Protection: Biodegradable materials including blankets, mats or logs which are placed on a shoreline for temporary erosion protection and to help support native vegetation and plantings.

Native Plantings: Native coastal shrubs are ~~included on the attached list.~~

to be used per approved plan. D. Reis

Coir Logs: Coconut fiber material woven into mats and rolled to form elongated cylinders or “logs” which are staked into the ground to provide erosion protection and as a base for plantings.

General Conditions:

1. Existing shoreline vegetation shall be preserved both during and after work completion.
- N/A* 2. The contractor must contact CRMC Staff prior to work, as a preconstruction meeting or consultation may be required before work can commence.
3. Photos of the completed work shall be provided to the CRMC immediately upon work completion.

D. Reis

Conditions for the Placement of Existing Beach Stone:

1. Only existing beach stone from the immediate vicinity (generally within 35 feet) of the eroded bluff may be used for bluff protection by stacking it against the scarp (eroded bluff face). Excess removal and use of beach stone beyond 35 feet from the eroded bluff or below the mean high water mark is not allowed.
2. Stone from off-site areas may not be used.
3. No mortar or concrete may be used.
4. No construction debris including any existing shoreline debris may be used to protect eroded areas by placing against the scarp.

Conditions for the Use of Nonstructural Shoreline Protection and Native Plantings:

1. Only biodegradable erosion control blankets (such as jute mesh/mats) or logs may be utilized.
2. Coir logs or erosion control blankets may be placed above a base layer of bluff “toe” protection using existing beach stone. Coir logs shall be adequately anchored with wooded stakes. Supplemental native plantings are recommended.
3. Steep erosive slopes shall be cut back (rather than filling out) to create a gentle slope conducive to native plantings and the establishment of protective vegetation.



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

August 16, 2024

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:

This is being provided in response to your letter dated August 2, 2024 directing submission of a restoration plan from a qualified professional that includes non-structural stabilization of the coastal feature and plantings in the "previously vegetated natural buffer zone". As attested to and depicted in our Petition for Water Type Change, the CRMC-approved, large-scale non-structural shoreline protection installed by the Club in 2013 has failed to protect the Club's golf course from rapid erosion, even with annual maintenance. Despite repeated efforts, much of the approved plantings failed to grow successfully over the course of the last decade, and any established vegetation, including trees and shrubs, was ripped out or carried away by a December 2022 storm. Indeed, there is no previously vegetated buffer zone to restore. The agency is well aware of the significant erosion on our shoreline over the last thirty years, measuring between 42 and 57 feet, all the while using an extensive range of non-structural measures. Given this history, we are stunned that the agency would arbitrarily order the Club to stabilize its shoreline using the same non-structural methods that have been demonstrated to be completely ineffective in protecting its property and create a threat to the safety of its golfers. Due to the shoreline's highly erosive conditions, there is no non-structural design that will provide true stabilization of the bluff. *See* NOAA's Guidance for Considering the Use of Living Shorelines (2015) (indicating that green (soft) shoreline stabilization techniques are not appropriate for high

cervenka green & ducharme llc
225 Dyer Street, 2nd Floor, Providence, RI 02903
www.cgdesq.com | p: (401) 214-1020
G3 (1 of 2)

wave energy environments).

In light of the above, and subject to our reservation of rights and continuing objection to implement a restoration plan while we pursue our Water Type Change Petition¹, we enclose a Coastal Restoration Plan prepared by Cherenzia & Associates, which provides for temporary non-structural stabilization of the Club's northeastern shoreline. Please note our engineer's opinion that "any non-structural restoration measures will be more susceptible to tidal surges and storm events that can partially or completely erode such measures in place and ***are not viable for long-term stabilization.***" Cherenzia Coastal Restoration Narrative, p.2 (emphasis supplied).

As far as authorization from USACE, we have been directed to file a permit application, which we will complete once CRMC approves a restoration plan.

Sincerely,



Jennifer R. Cervenka

Attachments

cc: Janice Mathews, QCC
Sergio Cherenzia, Cherenzia & Associates, Ltd.
Joseph Klinger, Ecotones, Inc.
Michael McCaffrey, Esq.
Anthony DeSisto, CRMC Chief Legal Counsel
Jeffrey M. Willis, CRMC Executive Director
Elizabeth Waterhouse, USACE

¹ The Club stands ready to remove immediately rock that is located below Mean High Water. In doing so, this would implement a partial restoration and resolve fully the agency's cited violation for filling of tidal waters. See Notice of Administrative Fine dated August 28, 2023.

H. ATTACHMENTS

1. Cease & Desist Order 23-0185, dated August 28, 2023
2. \$10,000 Notice of Administrative Fine, dated August 21, 2023
3. \$10,000 Notice of Administrative Fine, dated August 28, 2023
4. \$10,000 Notice of Administrative Fine, dated August 28, 2023



State of Rhode Island
Coastal Resources Management Council
Oliver H. Stedman Government Center
4808 Tower Hill Road, Suite 116
Wakefield, RI 02879-1900

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

August 28, 2023

Quidnessett Country Club, Inc.
PO Box 860
East Greenwich, RI 02818

Cease and Desist Order

Dear Quidnessett Country Club, Inc.:

Under the regulations of the Rhode Island Coastal Resources Management Program (RICRMP), any construction, grading, or filling activities or other alterations within 200 feet of coastal feature associated with tidal waters or coastal ponds of the state or in CRMC's freshwater wetlands in the vicinity of the coast jurisdiction, requires plans for the proposed work be submitted to the Coastal Resources Management Council (CRMC) for review, evaluation, and comment prior to the proposed activity. Failure to do so is a violation of the RICRMP. After evaluation of the plans by CRMC staff, their comments and the requirements for the proposed activities are forwarded to the applicant.

It has come to the attention of the CRMC that you or your agent have undertaken the unauthorized construction of a rip-rap revetment on a coastal feature, cutting of vegetation on a coastal feature, and filling of tidal waters at your property located at Plat 167, Lot 2, 950 North Quidnessett Road, North Kingstown; without benefit of a CRMC assent or in violation of a Council order.

This activity is in violation of the Rhode Island Coastal Resources Management Program. You are hereby issued a Cease and Desist Order Number 23-0185, dated August 21, 2023, and ordered to cease all activity at this site and to contact this office within 10 days of the date of this letter.

Failure to comply with this order shall be a violation of a duly adopted Council regulation, and subject to all fines and penalties established by law. Each day of noncompliance shall be deemed a separate and distinct violation in accordance with Section 46-23-7, G.L.R.I.

Sincerely yours,


Brian Harrington, Sr. Environmental Scientist
Coastal Resources Management Council

/jla
Enclosure

7018 0360 0000 8180 4174



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

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

August 21, 2023

Quidnessett Country Club, Inc.
PO Box 860
East Greenwich, RI 02818

Notice of Administrative Fine

Violation Site: 950 North Quidnessett Road, North Kingstown; Plat: 167 Lot: 2
Violation File No.: 23-0185

Dear Quidnessett Country Club, Inc.:

On August 18, 2023, CRMC staff visited Plat 167, Lot 2; in the Town of North Kingstown, and discovered that you and your agent have undertaken unauthorized construction of a rip-rap revetment on a coastal feature.

In accordance with Rhode Island General Laws Sections 46-23-7 and 46-23-7.1, you are hereby assessed an Administrative Fine of \$10,000. In addition, a per diem fine of \$1000 for each day can be assessed during which this violation continues upon issuance of a separate Cease and Desist Order from the Council.

You have the right to file an appeal for an Administrative Hearing, within 21 days from the receipt of this notice. The request for an Administrative Hearing must be delivered to the Council at the above address, in writing, within this 21-day period. This request shall specify in detail the statements contested by you. Additionally, this request must contain a valid phone number or e-mail address where we can contact you when necessary. If no hearing is requested after the expiration of a 21-day period, the Council shall issue a final order assessing the penalties specified in the notice. The penalty is due when the final order is issued.

Please be advised that the levy of this fine does not preclude any further Council action regarding this violation. In addition, should the Council determine there are other violations on said property, you may be assessed additional administrative fines. This notice of administrative fine will be filed in the land evidence records.



Laura Miguel, Deputy Director
Coastal Resources Management Council

/jla

7018 0360 0000 8180 4174



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

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

August 28, 2023

Quidnessett Country Club, Inc.
PO Box 860
East Greenwich, RI 02818

Notice of Administrative Fine

Violation Site: 950 North Quidnessett Road, North Kingstown; Plat: 167 Lot: 2
Violation File No.: 23-0185

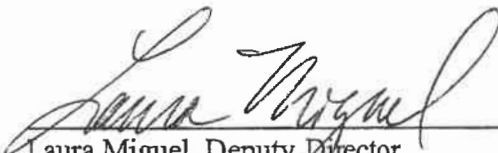
Dear Quidnessett Country Club, Inc.:

On August 18, 2023, CRMC staff visited Plat 167, Lot 2; in the Town of North Kingstown, and discovered that you and your agent have undertaken filling of tidal waters.

In accordance with Rhode Island General Laws Sections 46-23-7 and 46-23-7.1, you are hereby assessed an Administrative Fine of \$10,000. In addition, a per diem fine of \$1000 for each day can be assessed during which this violation continues upon issuance of a separate Cease and Desist Order from the Council.

You have the right to file an appeal for an Administrative Hearing, within 21 days from the receipt of this notice. The request for an Administrative Hearing must be delivered to the Council at the above address, in writing, within this 21-day period. This request shall specify in detail the statements contested by you. Additionally, this request must contain a valid phone number or e-mail address where we can contact you when necessary. If no hearing is requested after the expiration of a 21-day period, the Council shall issue a final order assessing the penalties specified in the notice. The penalty is due when the final order is issued.

Please be advised that the levy of this fine does not preclude any further Council action regarding this violation. In addition, should the Council determine there are other violations on said property, you may be assessed additional administrative fines. This notice of administrative fine will be filed in the land evidence records.



Laura Miguel, Deputy Director
Coastal Resources Management Council

/jla

7018-0360-0000-8180-4174



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

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

August 28, 2023

Quidnessett Country Club, Inc.
PO Box 860
East Greenwich, RI 02818

Notice of Administrative Fine

Violation Site: 950 North Quidnessett Road, North Kingstown; Plat: 167 Lot: 2
Violation File No.: 23-0185

Dear Quidnessett Country Club, Inc.:

On August 18, 2023, CRMC staff visited Plat 167, Lot 2; in the Town of North Kingstown, and discovered that you and your agent have undertaken unauthorized cutting of vegetation on a coastal feature.

In accordance with Rhode Island General Laws Sections 46-23-7 and 46-23-7.1, you are hereby assessed an Administrative Fine of \$10,000. In addition, a per diem fine of \$1000 for each day can be assessed during which this violation continues upon issuance of a separate Cease and Desist Order from the Council.

You have the right to file an appeal for an Administrative Hearing, within 21 days from the receipt of this notice. The request for an Administrative Hearing must be delivered to the Council at the above address, in writing, within this 21-day period. This request shall specify in detail the statements contested by you. Additionally, this request must contain a valid phone number or e-mail address where we can contact you when necessary. If no hearing is requested after the expiration of a 21-day period, the Council shall issue a final order assessing the penalties specified in the notice. The penalty is due when the final order is issued.

Please be advised that the levy of this fine does not preclude any further Council action regarding this violation. In addition, should the Council determine there are other violations on said property, you may be assessed additional administrative fines. This notice of administrative fine will be filed in the land evidence records.

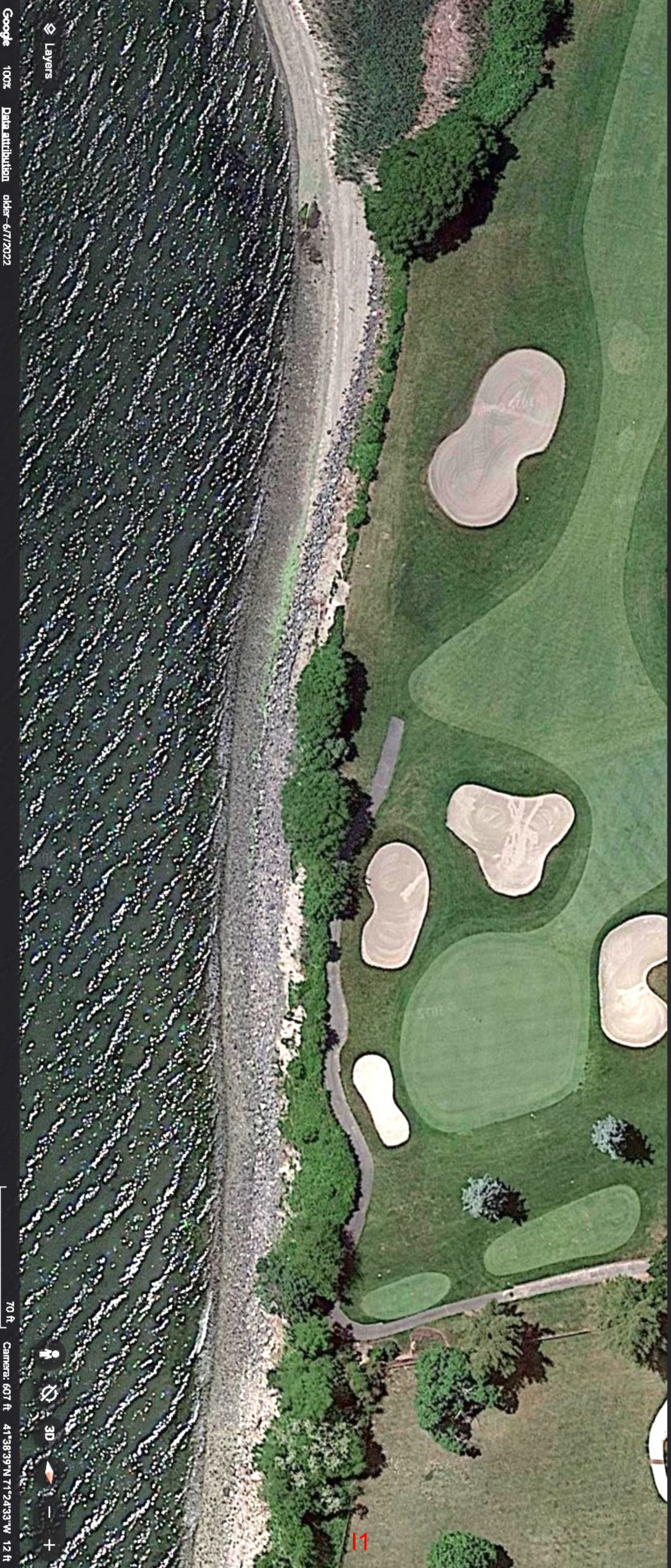
Laura Miguel, Deputy Director
Coastal Resources Management Council

/jla

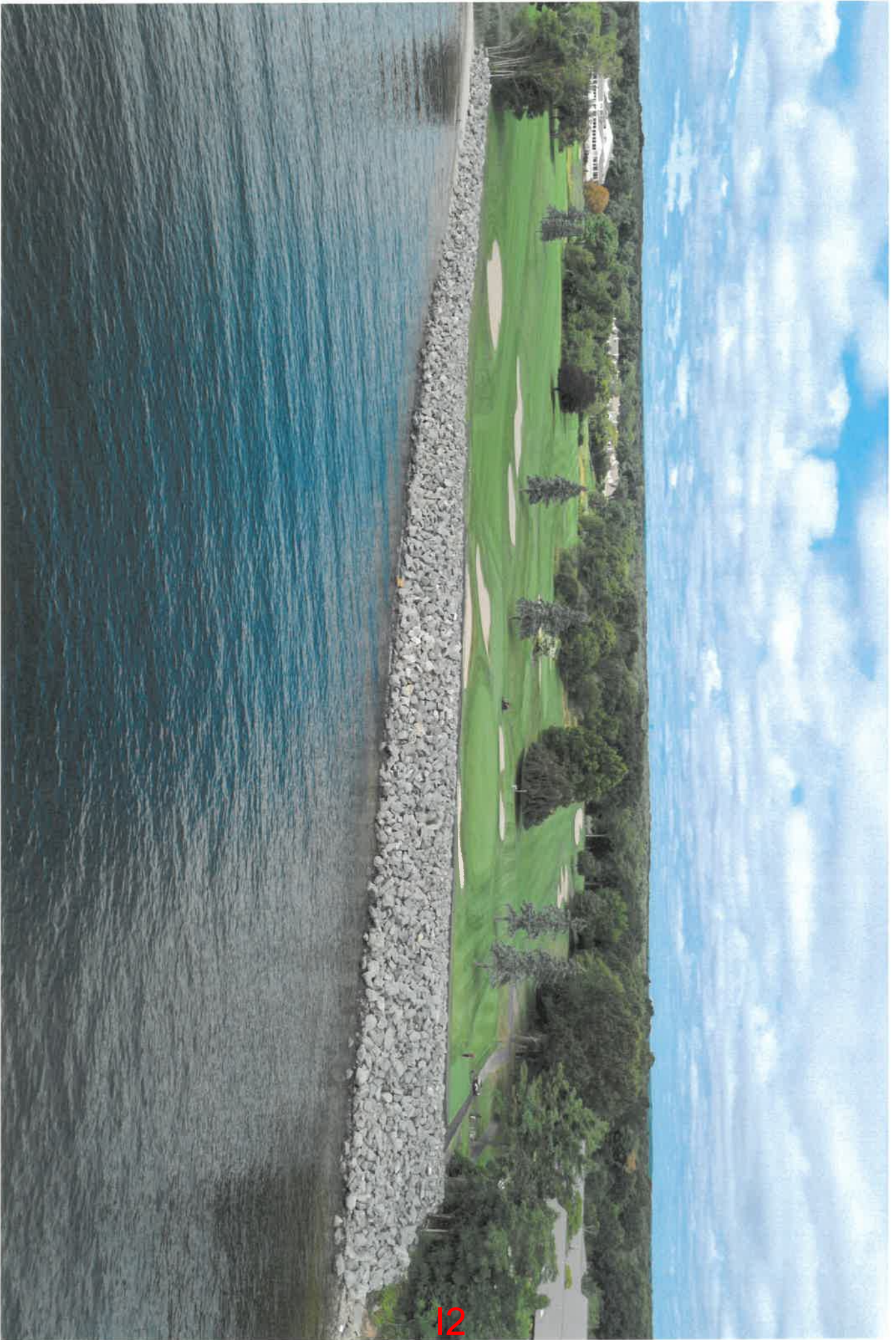
7618-0360-0000 8180 4174

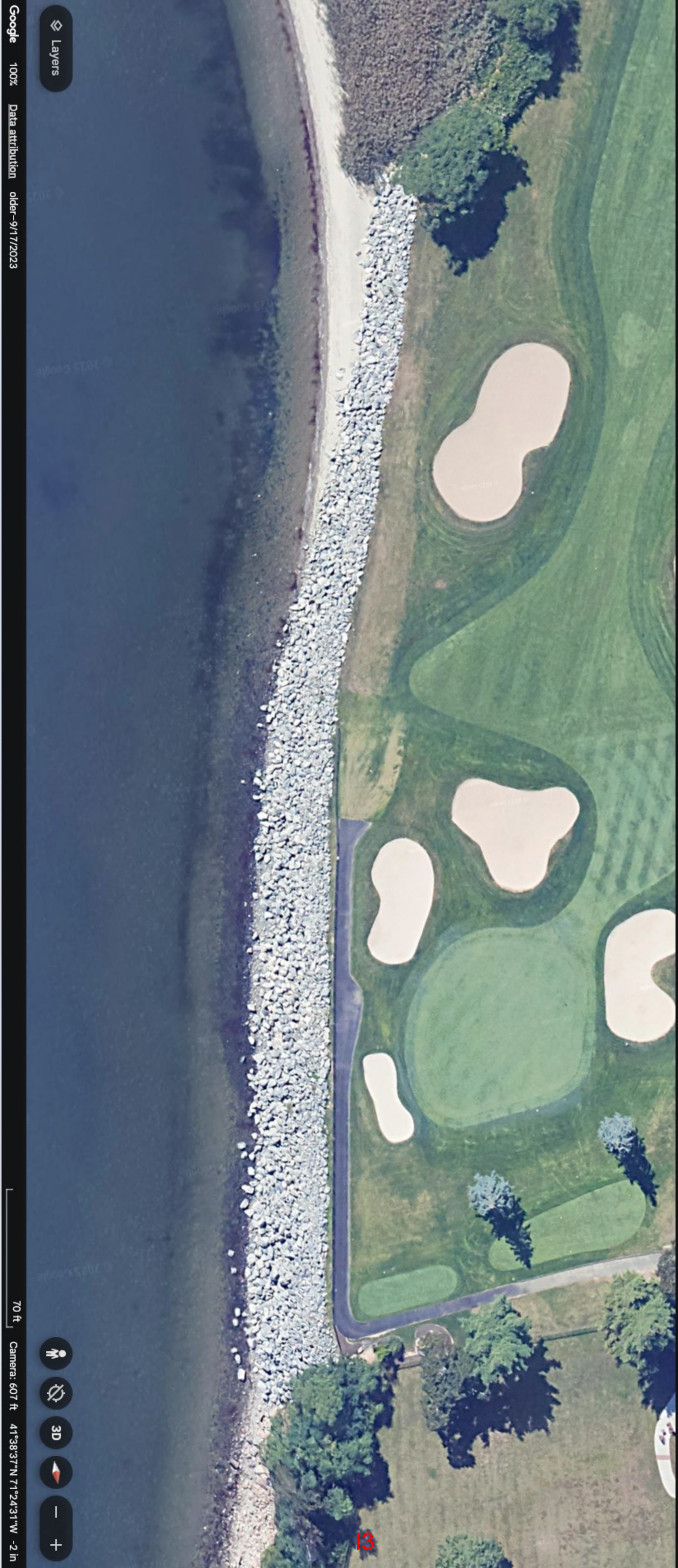
I. PHOTOS

1. Google Earth Image: June 7, 2022
2. Photo taken by Brian A. Harrington, August 18, 2023
3. Google Earth Image: September 17, 2023
4. Proposed Toes of Features, Google Earth Image: April 2024



Layers





Layers

Proposed Toes of Features

Google Earth Image: September 2024

Lines were digitized by CRMC Staff from the georeferenced restoration plan submitted by QCC on May 16, 2025 and the conceptual build-out of the 2013 DiPrete Plan submitted by QCC on Feb. 7, 2025.

Legend

- 2013 "as-built" extent
- 2013 Cross Section Conceptual Build Out Extent
- 2013 Plan View Extent
- 2022 LIDAR HTL

J. APPENDICES

- 1. Abridged Enforcement Chronology**
- 2. Correspondence**
- 3. Proposed Restoration Plans (5)**

APPENDIX 1
ABRIDGED ENFORCEMENT CHRONOLOGY

August 17, 2023	Complaint received that unauthorized work had been undertaken at Quidnessett Country Club.
August 18, 2023	CRMC enforcement staff inspected the site and found that unauthorized construction of a rip-rap revetment on a coastal feature, cutting of vegetation on a coastal feature and filling of tidal waters had taken place.
August 28, 2023	Cease & Desist Order 23-0185 issued to Quidnessett Country Club, Inc., for unauthorized construction of a rip-rap revetment on a coastal feature, cutting of vegetation on a coastal feature, and filling of tidal waters. \$10,000 Notice of Administrative Fine issued for undertaking unauthorized construction of a rip-rap revetment on a coastal feature. \$10,000 Notice of Administrative Fine issued for undertaking unauthorized cutting of vegetation on a coastal feature. \$10,000 Notice of Administrative Fine issued for undertaking unauthorized filling of tidal waters.
October 10, 2023	Notice of Administrative Fines appealed by attorney Jennifer Cervenka.
May 22, 2024	Letter to Quidnessett Country Club, Inc., requiring the submittal of a complete, acceptable restoration plan by June 21, 2024.
June 18, 2024	Letter to Quidnessett Country Club, Inc. granting a 30-day extension from June 21, 2024 to July 21, 2024, for a complete, acceptable, restoration plan to be submitted.
July 19, 2024	Letter from attorney Jennifer Cervenka requesting a time extension for a complete, acceptable, restoration plan to be submitted.
July 22, 2024	Letter to Quidnessett Country Club, Inc. denying the request for a time extension to submit a complete, acceptable restoration plan. The letter states the deadline for plan submittal is July 26, 2024.
July 26, 2024	Letter from attorney Jenn Cervenka. An as-built survey was submitted that did not show proposed restoration.
August 2, 2024	Letter to Quidnessett Country Club, Inc. requiring that a complete, acceptable restoration plan be submitted by August 16, 2024.
August 16, 2024	Letter, coastal restoration narrative, and unacceptable restoration plan submitted by Quidnessett Country Club, Inc.
September 3, 2024	Letter to Quidnessett Country Club, Inc. requiring that a complete, acceptable restoration plan be submitted by September 20, 2024.
September 20, 2024	Letter and unacceptable restoration plan submitted by Quidnessett Country Club, Inc.
October 11, 2024	Letter sent to Quidnessett Country Club, Inc. detailing restoration requirements and requiring that a complete acceptable restoration plan be submitted by November 1, 2024.
November 1, 2024	Letter and unacceptable revised restoration plan submitted by Quidnessett Country Club, Inc.

November 22, 2024	Letter sent to Quidnessett Country Club, Inc. detailing restoration plan changes that would make their plan acceptable and requiring that a complete acceptable restoration plan be submitted by December 6, 2024.
December 6, 2024	Letter from attorney Jenn Cervenka stating they would submit a revised restoration plan by December 20, 2024.
December 20, 2024	Letter from attorney Jenn Cervenka requesting a meeting with CRMC enforcement and engineering staff.
January 24, 2025	Meeting held with Quidnessett Country Club, Inc., to discuss the acceptable location of the “toe of berm” to be shown on a proposed restoration plan.
February 25, 2025	Letter sent to Quidnessett Country Club, Inc. requiring a complete, acceptable restoration plan be submitted by March 7, 2025, or the matter would be scheduled in front of the Coastal Council as an Order to Restore on April 8, 2025.
March 19, 2025	Letter sent to Quidnessett Country Club, Inc. Letter said that the matter was scheduled in front of the Coastal Council as an Order to Restore. “Notice of Enforcement Action” sent to Quidnessett Country Club, Inc. scheduling Order to Restore before the Full Council on April 8, 2025.
March 26, 2025	Email sent to attorney Jenn Cervenka. Email contained photographs of the shoreline at Quidnessett from previous years.
March 27, 2025	Access to Public Records Access request submitted for information related to CRMC assent 2013-03-133.
March 28, 2025	Letter and unacceptable restoration plan submitted by Quidnessett Country Club, Inc. Prehearing Memorandum Exhibits submitted by email and hard copy.
April 7, 2025	Letter from attorney Jenn Cervenka advising that they were withdrawing the plan submitted on March 28, 2025, making changes to it, and will be resubmitting it.
April 10, 2025	Email sent to attorney Jenn Cervenka requiring that a new plan and/or any additional information must be submitted by Friday, April 18, 2025.
April 14, 2025	Letter from attorney Jenn Cervenka requesting the deadline to submit new plans and/or information be May 23, 2025.
May 9, 2025	Email sent to attorney Jenn Cervenka requiring that a new plan and/or any additional information must be submitted by Friday, May 16, 2025.
May 16, 2025	Letter and unacceptable restoration plan submitted by Quidnessett Country Club, Inc.

APPENDIX 2

CORRESPONDENCE

- J5.** Notice of Administrative Fines appeal letter, dated October 10, 2023
- J6.** Letter to Quidnessett Country Club, Inc. dated May 22, 2024
- J7.** Letter from attorney Jennifer Cervenka, dated May 23, 2024
- J9.** Email from attorney Jennifer Cervenka, dated June 7, 2024
- J10.** Letter to Quidnessett Country Club, Inc., dated June 11, 2024
- J11.** Letter to Quidnessett Country Club, Inc., dated June 18, 2024
- J12.** Letter from attorney Jennifer Cervenka, dated July 19, 2024
- J14.** Letter to Quidnessett Country Club, Inc., dated July 22, 2024
- J15.** Letter from attorney Jennifer Cervenka, dated July 26, 2024
- J17.** Existing Conditions/Data Accumulation Survey Plan, dated July 23, 2024
- J18.** Letter to Quidnessett Country Club, Inc., dated August 2, 2024
- J19.** Letter from attorney Jennifer Cervenka, dated August 16, 2024
- J21.** Coastal Restoration Narrative by Sergio F. Cherenzia, P.E., dated August 16, 2024
- J23.** Coastal Restoration Plan, dated August 16, 2024
- J24.** Existing Conditions/Data Accumulation Survey Plan, dated July 23, 2024
- J25.** Letter to Quidnessett Country Club, Inc., dated September 3, 2024
- J27.** Letter from attorney Jennifer Cervenka, dated September 20, 2024
- J29.** Letter from Sergio F. Cherenzia, P.E., dated September 20, 2024
- J31.** Coastal Restoration Plan, dated revised September 20, 2024
- J32.** Soil Erosion & Sedimentation Plan, dated revised September 20, 2024
- J33.** Existing Conditions/Data Accumulation Survey Plan, dated July 23, 2024
- J34.** Letter to Quidnessett Country Club, Inc., dated October 11, 2024
- J36.** Letter from attorney Jennifer Cervenka, dated November 1, 2024
- J38.** Coastal Restoration Plan, dated revised October 30, 2024
- J39.** Soil Erosion & Sedimentation Plan, dated revised October 30, 2024
- J40.** Existing Conditions/Data Accumulation Survey Plan, dated July 23, 2024
- J41.** Coastal Restoration Plan (with “DiPrete Line”), dated revised October 30, 2024
- J42.** Letter to Quidnessett Country Club, Inc., dated November 22, 2024
- J44.** Letter from attorney Jennifer Cervenka, dated December 6, 2024
- J46.** Letter from attorney Jennifer Cervenka, dated December 20, 2024
- J48.** Toe of Berm Figure plan, dated December 20, 2024
- J49.** Email to attorney Jenn Cervenka, dated January 29, 2025
- J51.** Email from attorney Jenn Cervenka, dated February 3, 2025
- J54.** 2011 Aerial Overlay, dated February 3, 2025
- J55.** Email from attorney Jenn Cervenka, dated February 7, 2025
- J59.** Previous Approved Plan Overlay, dated February 3, 2025
- J60.** Email from attorney Jenn Cervenka, dated February 14, 2025
- J64.** NRS 2011 Historic Aerial, Quidnessett Country Club, dated June 12, 2013
- J65.** Previous Approved Plan Overlay, dated revised February 13, 2025
- J66.** Letter to Quidnessett Country Club, Inc., dated February 25, 2025

- J68.** Letter from attorney Jennifer Cervenka, dated March 7, 2025
- J70.** Letter to Quidnessett Country Club, Inc., dated March 19, 2025
- J71.** Notice of Enforcement Action, dated March 19, 2025
- J72.** Email to attorney Jenn Cervenka, dated March 26, 2025
- J73.** Access to Public Records Access request, dated March 27, 2025
- J75.** Letter from attorney Jennifer Cervenka, dated March 28, 2025
- J77.** Letter from Sergio F. Cherenzia, P.E., dated March 28, 2025
- J79.** Email from attorney Jenn Cervenka, dated March 28, 2025
- J80.** Coastal Restoration Plan, dated revised March 28, 2025
- J81.** Soil Erosion & Sedimentation Plan, dated revised March 28, 2025
- J82.** Planting Plan, dated March 28, 2025
- J83.** Letter from attorney Jennifer Cervenka, dated April 7, 2025
- J85.** Email to attorney Jenn Cervenka, dated April 10, 2025
- J87.** Letter from attorney Jennifer Cervenka, dated April 14, 2025
- J89.** Email from attorney Jenn Cervenka, dated May 5, 2025
- J90.** Quidnessett Country Club's Motion to Assign to a Hearing Officer
- J91.** Email to attorney Jennifer Cervenka, dated May 9, 2025
- J98.** Letter from attorney Jennifer Cervenka, dated May 16, 2025
- J100.** Coastal Restoration Site Development Plans (4 sheets), dated May 16, 2025



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

October 10, 2023

VIA EMAIL ONLY

Anthony DeSisto, Chief Legal Counsel
Coastal Resources Management Council
Oliver H. Stedman Government Center
4808 Tower Hill Road, Suite 3
Wakefield, RI 02879-1900
adlawllc@gmail.com

Re: Quidnessett Country Club, Inc. – CRMC Violation File No. 23-0185, Notice of
Administrative Fine

Dear Attorney DeSisto:

Our firm represents Quidnessett Country Club, Inc. (“QCC”). On September 19, 2023, QCC received the above Notice, together with a Cease & Desist order, for certain construction activities on a coastal feature. On behalf of QCC, we request an administrative hearing pursuant to R.I. Gen. Laws § 46-23-7.1(2). As discussed previously, we would like to engage in immediate settlement discussions to see whether we can resolve this matter through a consent agreement. Please let me know of your and your client’s earliest availability for a call or meeting to review.

Sincerely,

Jennifer R. Cervenka

cc: Janice Mathews

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



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

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

May 22, 2024

Quidnessett Country Club, Inc.
PO Box 860
East Greenwich, RI 02818

RE: CRMC Cease & Desist Order 23-0185, August 28, 2023
Plat 167, Lot 2, 950 North Quidnessett Road, North Kingstown

Dear Quidnessett Country Club, Inc.:

On August 28, 2023, you were issued CRMC Cease & Desist Order 23-0185 for undertaking unauthorized construction of a rip-rap revetment on a coastal feature, cutting of vegetation on a coastal feature, and filling of tidal waters without a CRMC assent. These unauthorized activities are in violation of the Rhode Island Coastal Resources Management Program.

In order to resolve these violations, you must submit a complete, acceptable restoration plan, prepared by a qualified professional, to the CRMC within 30 days of the date of this letter. Once approved by CRMC staff, the restoration must be completed within 90 days.

The proposed restoration plan must include the following:

- Removal of all unauthorized riprap and fill.
- Nonstructural stabilization of the coastal feature (reference Coastal Resources Management Program, section 1.3.1.G).
- Proposed native shrub and tree plantings, of appropriate size and density, throughout all areas of previously vegetated natural buffer zone.
- Restoration must also receive approval from the Army Corps of Engineers.

If a restoration plan is not submitted by June 21, 2024, the matter will be referred to the Coastal Council for an Enforcement Hearing.

Sincerely,


Brian A. Harrington, Environmental Scientist III
Coastal Resources Management Council

/7019 2280 0000 4949 3189
Certified Mail



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

May 23, 2024

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:

We are in receipt of your letter dated May 22, 2024. As you know, we have been engaged with the agency since the Fall of 2023 in a good faith attempt to resolve the above-referenced enforcement action. As part of the resolution, QCC proposed to submit a Water Type Change Petition, which if successful, would allow QCC to then submit a Category B application for consideration of shoreline protection along Type 2 Waters. In March, the agency stated that QCC must either submit a water type change application pursuant to the CRMC's Management Procedures *or* a restoration plan. Subsequently, we timely submitted the Petition, which has now been approved by the agency's Policy and Planning Subcommittee ("P&P") for advanced rulemaking, and the public comment period commenced earlier this week. Further, it was stated during the P&P's public meeting on May 14, 2024 that the enforcement path would be "a lot different" if the Petition were to be approved. This statement is consistent with the agency's earlier agreement to allow the Petition to proceed through the process in lieu of an immediate restoration. Given the agency's prior representations and the P&P's comments and vote to allow rulemaking, we were greatly surprised to receive a directive to submit a restoration plan now and, following approval, complete the restoration within ninety (90) days.

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

In light of the above, we will be requesting that this matter be addressed with the agency's Administrative Hearing Officer, consistent with our October 10, 2023 request for an administrative hearing pursuant to R.I. Gen. Laws § 46-23-7.1(2). I'll coordinate with Attorney DeSisto to make arrangements for an initial status conference.

Sincerely,



Jennifer R. Cervenka

cc: Janice Mathews, QCC
Joseph Klinger, Ecotones, Inc.
Anthony DeSisto, CRMC Chief Legal Counsel
Jeffrey M. Willis, CRMC Executive Director

Quidnessett Country Club - CRMC Cease & Desist Order, Notices of Administrative Fines, CRMC Enforcement File No. 23-0185

From Jennifer Cervenka <jcervenka@cgdesq.com>

Date Fri 6/7/2024 1:21 PM

To mhartmann@adlawllc.net <mhartmann@adlawllc.net>

Cc De Sisto, Tony <adlawllc@gmail.com>; Jeff Willis <jwillis@crmc.ri.gov>; Brian Harrington <bharrington@crmc.ri.gov>; Janice Mathews <janicem@jancompanies.com>; jklinger@ecotonesinc.com <jklinger@ecotonesinc.com>

 3 attachments (367 KB)

20231010 Letter Request to A. DeSisto.pdf; Quidnessett Country Club, Inc. Letter dated 5.22.2024.pdf; 20240523 Letter to B. Harrington .pdf;

Good afternoon Attorney Hartman,

I represent the Quidnessett Country Club with respect to the above enforcement matter. I am writing to you because I understand that you handle scheduling and other matters for CRMC's administrative hearing process. Last Fall, we requested an administrative hearing, which request I attach hereto. Since that time through early April 2024, we were in settlement discussions with agency counsel and enforcement staff. From those discussions, it was agreed that Club could file a petition for water type change, which we did file on April 12. The petition was subsequently approved by the Policy & Planning Subcommittee for advanced rulemaking. Since filing that petition and the P&P approval, enforcement staff issued a directive to submit a restoration plan by June 21st and complete restoration thereafter. I've attached that restoration directive and our response. In our response, we indicated that we would like this matter addressed by the Administrative Hearing Officer and that we would be requesting a status conference with same. Given that June 21st is only two weeks away, we would like to have that conference scheduled for next week (week of June 10) or the following week (week of June 17). Will you be able to coordinate that, or should I contact the Hearing Officer directly?

Thank you for your attention to this matter,
Jenn Cervenka

Jennifer Cervenka | Member



cervenka green & ducharme llc

225 Dyer Street, 2nd Floor
Providence, RI 02903
(401) 214-1022 (office)
(401) 480-8768 (mobile)
jcervenka@cgdesq.com



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

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

June 11, 2024

Quidnessett Country Club, Inc.
PO Box 860
East Greenwich, RI 02818

Violation Site: CRMC Cease & Desist Order 23-0185, dated August 28, 2023
Plat 167, Lot 2, 950 North Quidnessett Road, North Kingstown

Dear Attorney Cervenka:

This letter is in response to your request made to Jeff Willis, CRMC Executive Director, that a status conference be scheduled with the Administrative Hearing Officer. A status conference with the Administrative Hearing Officer is not appropriate, but CRMC staff and legal counsel are available for a status conference. I am out of the office Thursday and Friday of this week and next Wednesday is a state holiday. The only other time I'm not available next week is Tuesday due to a previously scheduled site meeting.

The Notice of Administrative Fines are a separate matter and will be scheduled before the Administrative Hearing Officer at a later date if necessary.

Sincerely,

Brian A. Harrington, Environmental Scientist III
Coastal Resources Management Council

/lat



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

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

June 18, 2024

Via Email
Quidnessett Country Club, Inc.
PO Box 860
East Greenwich, RI 02818

RE: CRMC Cease & Desist Order 23-0185, August 28, 2023
Plat 167, Lot 2, 950 North Quidnessett Road, North Kingstown

Dear Attorney Cervenka.:

As discussed in our meeting yesterday, in order to resolve CRMC Cease & Desist Order 23-0185, you were required to submit a complete, acceptable restoration plan, prepared by a qualified professional, to the CRMC by June 21, 2024. At that meeting you requested a time extension to submit the restoration plan due in part to the need to also address Army Corps of Engineers violation information requirements. Therefore, we are granting a 30-day extension from June 21, 2024, to July 21, 2024.

Sincerely,


Brian A. Harrington, Environmental Scientist III
Coastal Resources Management Council

/lat

cc: J. Cervenka, CGD, LLC via email



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

July 19, 2024

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

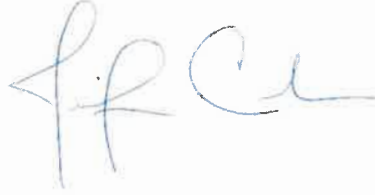
Dear Mr. Harrington:

We are writing to request an additional extension of time to submit a restoration plan directed by your letter of May 22, 2024, as extended by your letter dated June 18, 2024. Subsequent to your June 18th letter, we met with the USACE and, at its request, performed additional survey work, the results of which were submitted to the USACE in early July. We are awaiting a response to our submission, so that we can agree upon a restoration plan that, if approved, we believe will address all or some of the rock placements within federal jurisdiction. As mentioned at our last status conference, the proposed restoration should also resolve fully the Cease & Desist for filling of tidal waters.

Thank you for consideration of our request.

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

Sincerely,

A handwritten signature in blue ink, appearing to read "JRC", is positioned above the printed name.

Jennifer R. Cervenka

cc: Janice Mathews, QCC
Joseph Klinger, Ecotones, Inc.
Anthony DeSisto, CRMC Chief Legal Counsel
Jeffrey M. Willis, CRMC Executive Director



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

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

July 22, 2024


Via Email
Quidnessett Country Club, Inc.
PO Box 860
East Greenwich, RI 02818

RE: CRMC Cease & Desist Order 23-0185, August 28, 2023
Plat 167, Lot 2, 950 North Quidnessett Road, North Kingstown

Dear Attorney Cervenka.:

In response to your letter dated July 19, 2024, your request for an additional undetermined extension of time to submit a restoration plan cannot be granted. These violations were issued almost a year ago, and based on your letter what you are proposing to the Army Corps of Engineers, does not meet the restoration requirements detailed in my letter dated May 22, 2024. If a restoration plan is not submitted by Friday, July 26, 2024, further enforcement action may be taken, including but not limited to, the issuance of additional administrative fines.

Sincerely,


Brian A. Harrington, Environmental Scientist III
Coastal Resources Management Council

/lat

cc: J. Cervenka, CGD, LLC via email



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

July 26, 2024

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:

We are in receipt of your letter dated July 22, 2023, denying our request for an extension on the submission of a restoration plan. We had sought the extension so that we could first resolve potential violations cited by the USACE through removal of rock in federal jurisdictional areas. In addition, as noted earlier, we do not think that the agency's directive to fully restore the bluff is consistent with staff's decision, as approved by the Policy & Planning Subcommittee, to allow the Club to pursue a water type change as a means to resolve the cited violations. Furthermore, removal of the rock and re-installation of non-structural shoreline protection, which has repeatedly failed along this stretch of shoreline over the last decade, will render the 14th hole and other potential areas of the golf course unusable for a significant portion of the current golf season, and return the bluff to its previous vulnerable condition. As is reflected in our Petition for Water Type Change, the 2013 CRMC-approved non-structural shoreline protection, namely giant natural fiber sandbags ("burritos") built into the side of the bluff and plantings, provided no real protection against accelerated erosion. Ultimately, despite maintenance and repairs to the approved non-structural shoreline protection, the chronically battered bluff was pulverized by the 2022 storm, leaving nothing left of the burritos, vegetation, and bluff beyond the edge of the 14th hole golf cart path. If another major storm hits the restored unarmored bluff, it may destabilize the foundation upon which the 14th hole sits, endangering players,

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

or gut the bluff even further, causing irreversible damage to property and the Club's business.

Notwithstanding the above, subject to our continuing objection, and reserving all rights to contest the restoration while we are seeking a decision on our water type change (and, if approved, a Category B shoreline protection application), the Club proposes the following phased restoration plan based upon the attached existing conditions survey:

Phase I:

Removal of rock below mean high water (MHW). Rock below MHW has been evaluated by a structural engineer and can be removed relatively quickly and without affecting the stability of the rest of the stacked rock.

Phase II:

Removal of the rock between MHW and the high tide line (HTL). Prior to removal, this area must be inspected by a structural engineer and a plan devised to safely deconstruct the subject rock.

Phase III:

Removal of the rock between the HTL and the top of the bluff/14th golf cart path. Prior to removal, this area must be inspected by a structural engineer and a plan devised to safely deconstruct the subject rock.

As the agency's restoration directive states that the Club must also obtain approval from the USACE, we will continue to work directly with that agency to address compliance with federal regulations.

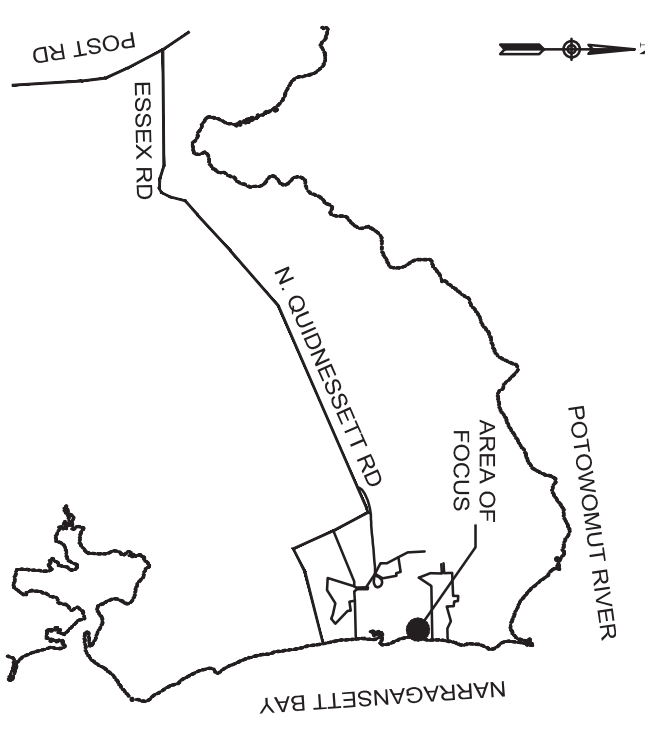
Sincerely,



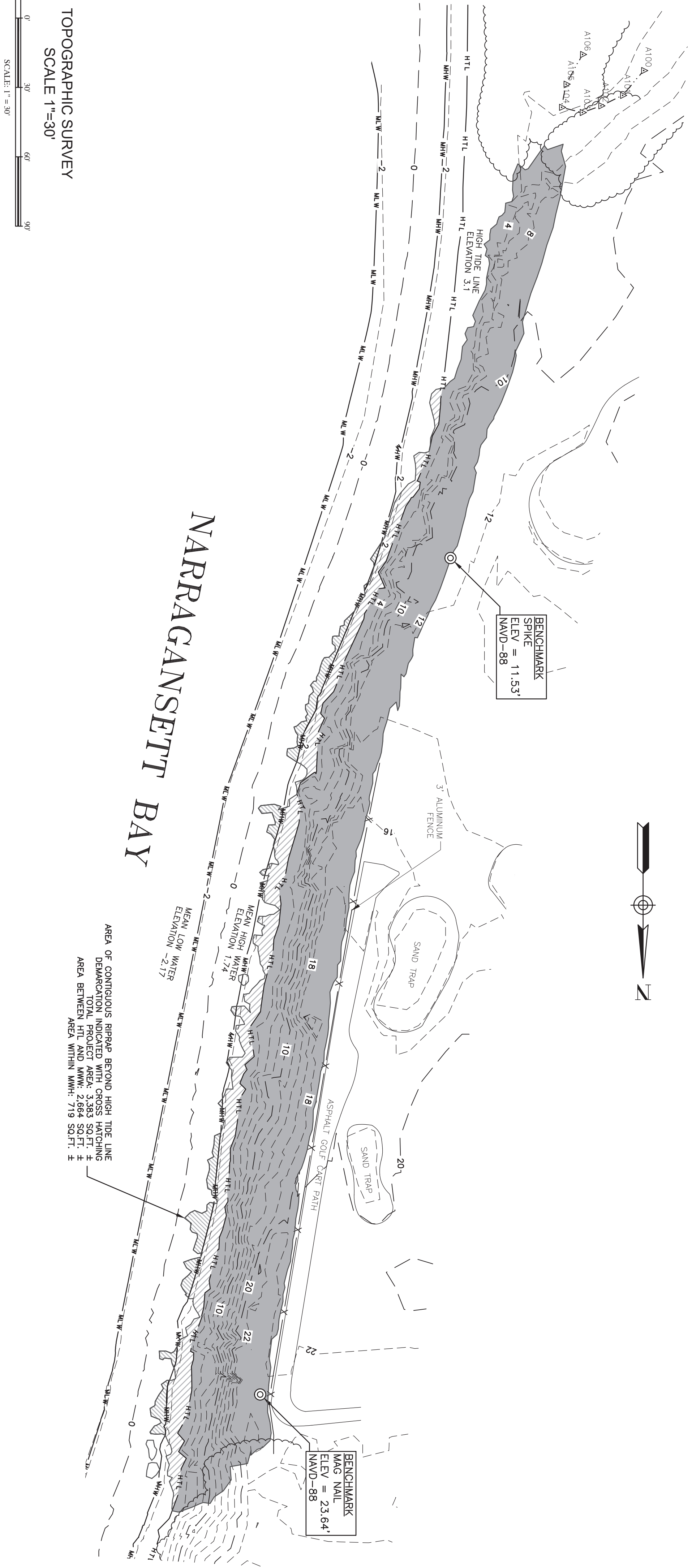
Jennifer R. Cervenka

Attachment

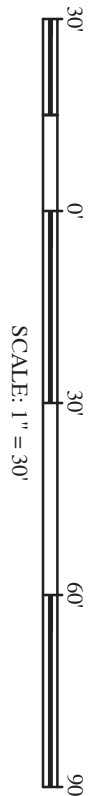
cc: Janice Mathews, QCC
Joseph Klinger, Ecotones, Inc.
Michael McCaffrey, Esq.
Anthony DeSisto, CRMC Chief Legal Counsel
Jeffrey M. Willis, CRMC Executive Director
Elizabeth Waterhouse, USACE



LOCATION MAP



TOPOGRAPHIC SURVEY
SCALE 1"=30'



ORTHOMOSIAC
SCALE 1"=30'

IMAGE DATE JULY 17, 2024



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 "JRL", KINGSTON, RI, & GEOD MODEL GEOD18.
- 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 GNS OBSERVATIONS AND THE USE OF UNMANNED AERIAL SYSTEMS (UAS) EQUIPPED WITH A HESAI PAIDAR X132 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-00-19 OF THE RULES AND REGULATIONS ADOPTED BY THE RHODE ISLAND STATE BOARD OF REGISTRATION FOR PROFESSIONAL LAND SURVEYORS ON NOVEMBER 29, 2019, AS FOLLOWS:

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

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:

PLS SIGNATURE

MARK A. CASTELLANOS PLS #2511

PRINTED PLS NAME & LICENSE NO.

LS.0004133-COA

PLAN REVISIONS				DATE	DESCRIPTION	BY	CHK
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 QUIDNESSSETT ROAD
PLAT 167 LOT 2
NORTH KINGSTOWN, RHODE ISLAND

PREPARED FOR
QUIDNESSSETT COUNTRY CLUB

MARK A. CASTELLANOS

PLS SIGNATURE
MARK A. CASTELLANOS PLS #2511
PRINTED PLS NAME & LICENSE NO.
LS.0004133-COA

SV-1



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

(401) 783-3370
Fax (401) 783-3767

August 2, 2024

Via Email
Quidnessett Country Club, Inc.
PO Box 860
East Greenwich, RI 02818

RE: CRMC Cease & Desist Order 23-0185, August 28, 2023
Plat 167, Lot 2, 950 North Quidnessett Road, North Kingstown

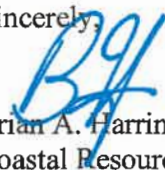
Dear Attorney Cervenka.:

The letter and survey submitted to the CRMC on July 26, 2024, is not an acceptable restoration plan. As per my letter to you dated May 22, 2024, the restoration plan was to be prepared by a qualified professional and address the following:

- Removal of all unauthorized riprap and fill.
- Nonstructural stabilization of the coastal feature (reference Coastal Resources Management Program, section 1.3.1.G).
- Proposed native shrub and tree plantings, of appropriate size and density, throughout all areas of previously vegetated natural buffer zone.
- Restoration must also receive approval from the Army Corps of Engineers.

In order to avoid further enforcement action, a complete, acceptable restoration plan that addresses these requirements must be submitted by August 16, 2024.

Sincerely,


Brian A. Harrington, Environmental Scientist III
Coastal Resources Management Council



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

August 16, 2024

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:

This is being provided in response to your letter dated August 2, 2024 directing submission of a restoration plan from a qualified professional that includes non-structural stabilization of the coastal feature and plantings in the "previously vegetated natural buffer zone". As attested to and depicted in our Petition for Water Type Change, the CRMC-approved, large-scale non-structural shoreline protection installed by the Club in 2013 has failed to protect the Club's golf course from rapid erosion, even with annual maintenance. Despite repeated efforts, much of the approved plantings failed to grow successfully over the course of the last decade, and any established vegetation, including trees and shrubs, was ripped out or carried away by a December 2022 storm. Indeed, there is no previously vegetated buffer zone to restore. The agency is well aware of the significant erosion on our shoreline over the last thirty years, measuring between 42 and 57 feet, all the while using an extensive range of non-structural measures. Given this history, we are stunned that the agency would arbitrarily order the Club to stabilize its shoreline using the same non-structural methods that have been demonstrated to be completely ineffective in protecting its property and create a threat to the safety of its golfers. Due to the shoreline's highly erosive conditions, there is no non-structural design that will provide true stabilization of the bluff. *See* NOAA's Guidance for Considering the Use of Living Shorelines (2015) (indicating that green (soft) shoreline stabilization techniques are not appropriate for high

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

wave energy environments).

In light of the above, and subject to our reservation of rights and continuing objection to implement a restoration plan while we pursue our Water Type Change Petition¹, we enclose a Coastal Restoration Plan prepared by Cherenzia & Associates, which provides for temporary non-structural stabilization of the Club's northeastern shoreline. Please note our engineer's opinion that "any non-structural restoration measures will be more susceptible to tidal surges and storm events that can partially or completely erode such measures in place and *are not viable for long-term stabilization*." Cherenzia Coastal Restoration Narrative, p.2 (emphasis supplied).

As far as authorization from USACE, we have been directed to file a permit application, which we will complete once CRMC approves a restoration plan.

Sincerely,



Jennifer R. Cervenka

Attachments

cc: Janice Mathews, QCC
Sergio Cherenzia, Cherenzia & Associates, Ltd.
Joseph Klinger, Ecotones, Inc.
Michael McCaffrey, Esq.
Anthony DeSisto, CRMC Chief Legal Counsel
Jeffrey M. Willis, CRMC Executive Director
Elizabeth Waterhouse, USACE

¹ The Club stands ready to remove immediately rock that is located below Mean High Water. In doing so, this would implement a partial restoration and resolve fully the agency's cited violation for filling of tidal waters. See Notice of Administrative Fine dated August 28, 2023.



**CHERENZIA
& ASSOCIATES, LTD.**

Civil Engineers • Land Surveyors
Land Use Planners • Environmental Consultants

Raymond F. Cherenzia, P.E., L.S., Founder
Sergio F. Cherenzia, P.E., President

COASTAL RESTORATION NARRATIVE

TO: Whom it May Concern

FROM: Sergio F. Cherenzia, P.E.

DATE: August 16, 2024

SUBJECT: Quidnessett Country Club
950 North Quidnessett Road
North Kingstown, Rhode Island
Plat 167 Lot 2

PROJECT NO.: 224031

On behalf of our client, Quidnessett Country Club, Inc. (QCC), Cherenzia & Associates, Ltd. (Cherenzia) has prepared the narrative herein to supplement the proposed restoration plan entitled "Coastal Restoration Plan" prepared for Quidnessett Country Club, 950 North Quidnessett Rd, Plat 167 Lot 2, North Kingstown Rhode Island" Dated August 16, 2024.

Cherenzia is in receipt of the following documents in consideration in preparing the proposed plan:

1. CRMC Emergency General Permit #2013-03-133.
2. Cease and Desist Order dated August 28, 2023 to Quidnessett Country Club, Inc. signed by Brian Harrington, Sr. Environmental Scientist, CRMC in addition to Notices of Administrative Fines signed by Laura Miguel, Deputy Director CRMC.
3. Quidnessett Country Club Petition for Change to Map of Water Type Classification dated April 12, 2024 and associated Ecotones, Inc. report dated April 11, 2024.
4. Letter dated May 22, 2024 from Brian Harrington, CRMC to Quidnessett Country Club, Inc. re: Cease and Desist Order 23-0185.
5. Letter dated May 23, 2024 to Brian Harrington, CRMC from Jennifer Cervenka, CRMC Re: Quidnessett Country Club, Inc. ("QCC") – Cease & Desist Order and associated letter of Notices of Administrative Fines, CRMC Enforcement File No. 23-0185.
6. CRMC Letters dated June 18, 2024 and July 22, 2024 regarding CRMC Cease & Desist Order 23-0185.

Office Location: 99 Mechanic St. • Pawcatuck, CT 06379 • Tel (860) 629-6500 • Fax (860) 599-6090
Mailing Address: P.O. Box 513 • Westerly, RI 02891 • Tel (401) 596-7747

7. Letter dated July 19, 2024 to Brian A. Harrington, CRMC from Jennifer Cervenka, re: Quidnessett Country Club, Inc. ("QCC") – Cease & Desist Order, Notices of Administrative Fines, CRMC Enforcement File No. 23-0185.
8. Letter dated July 26, 2024 to Brian A. Harrington, CRMC from Jennifer Cervenka, re: Quidnessett Country Club, Inc. ("QCC") – Cease & Desist Order, Notices of Administrative Fines, CRMC Enforcement File No. 23-0185.
9. Letter dated August 2, 2024 to Quidnessett Country Club, Inc. re: Cease and Desist Order #23-0185 signed by Brian Harrington.

The Cease & Desist Order asserted that there had been unauthorized construction of a rip-rap revetment on a coastal feature, cutting of vegetation on a coastal feature, and filling of tidal waters without a CRMC Assent.


The August 2, 2024 letter from Mr. Harrington indicates that the letter submitted on July 26, 2024 is not an acceptable restoration plan and the plan is to be prepared by a qualified professional and shall address the following:

- Removal of all unauthorized riprap and fill.
- Nonstructural stabilization of the coastal feature (reference CRMC Program, section 1.3.1.G).
- Proposed native shrub and tree plantings, of appropriate size and density, throughout all areas of the previously vegetated natural buffer zone.
- Restoration must also receive approval from the Army Corps of Engineers.

As such, Cherenzia has prepared the aforementioned plan which addresses each of these items. The plan proposes to remove all unauthorized riprap and fill, proposes short-term non-structural stabilization, and notes coordination with the owner's project biologist to specify native plantings which shall include addressing acceptable size and density. Native plants will be selected from the CRMC Coastal Buffer Zone Planting Guide Revised August 2008. Our client has also been engaged with Army Corps of Engineers and will continue to coordinate for the applicable approval(s) required. The proposed plan submitted herewith has addressed the Army Corps concern of removal of rip-rap fill seaward of the high tide line.

Cherenzia has also reviewed the CRMC file for Emergency General Permit #2013-03-133 in consideration of CRMC requirements outlined above and proposed restoration plan. It is our understanding in reviewing the Water Type Change Petition, including pictures, that the plan associated with permit 2013-03-133 was implemented, but, despite annual maintenance, worked poorly to stabilize the shoreline and was ultimately completely wiped out by a storm event in December 2022. It is important to note that it is our professional opinion that any non-structural restoration measures will be more susceptible to tidal surges and storm events that can partially or completely erode such measures in place and are not viable for long-term stabilization. The measures may have to be repaired and replaced depending on coastal weather and tidal events.

We acknowledge that there are regulatory restrictions to structural methods of stabilization; however, structural or hybrid models of structural and non-structural methods of stabilization have a higher probability of maintaining the integrity of the shoreline to protect the land behind it from persistent erosion and loss of property.



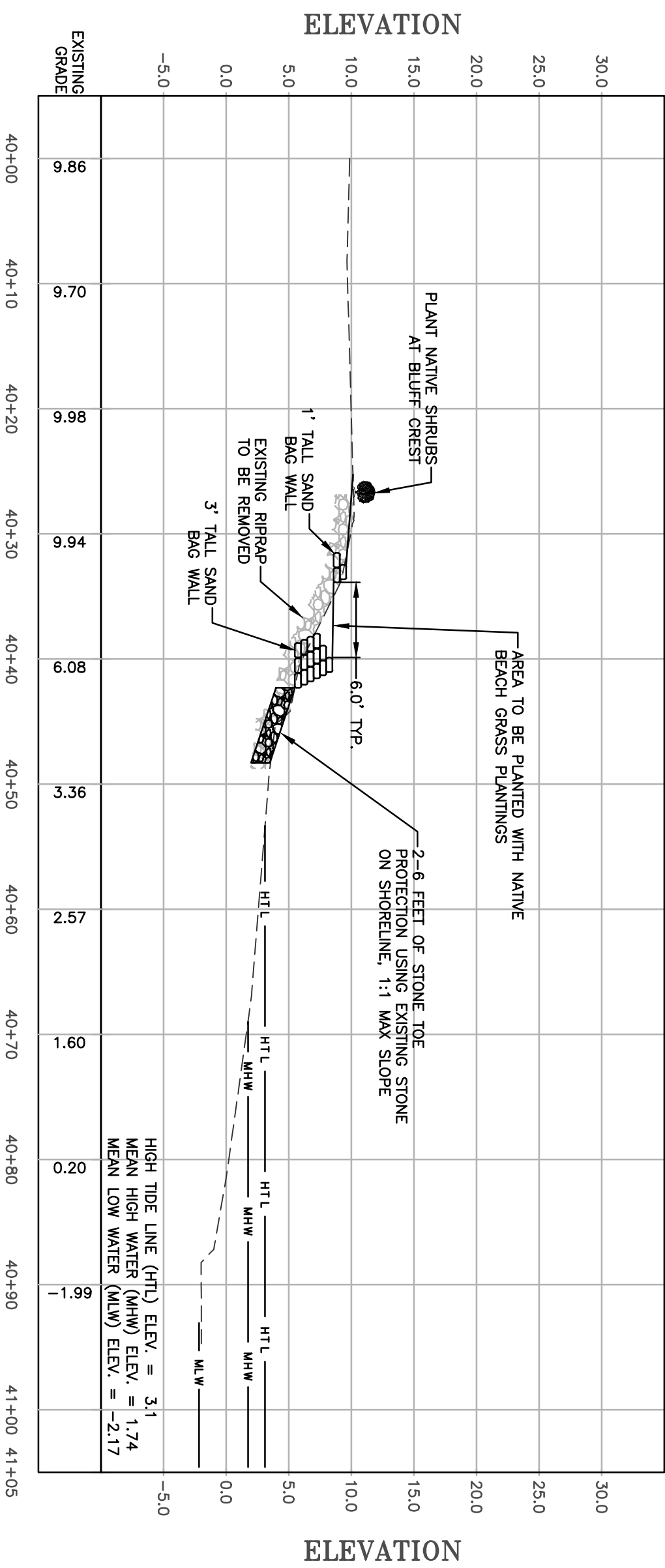
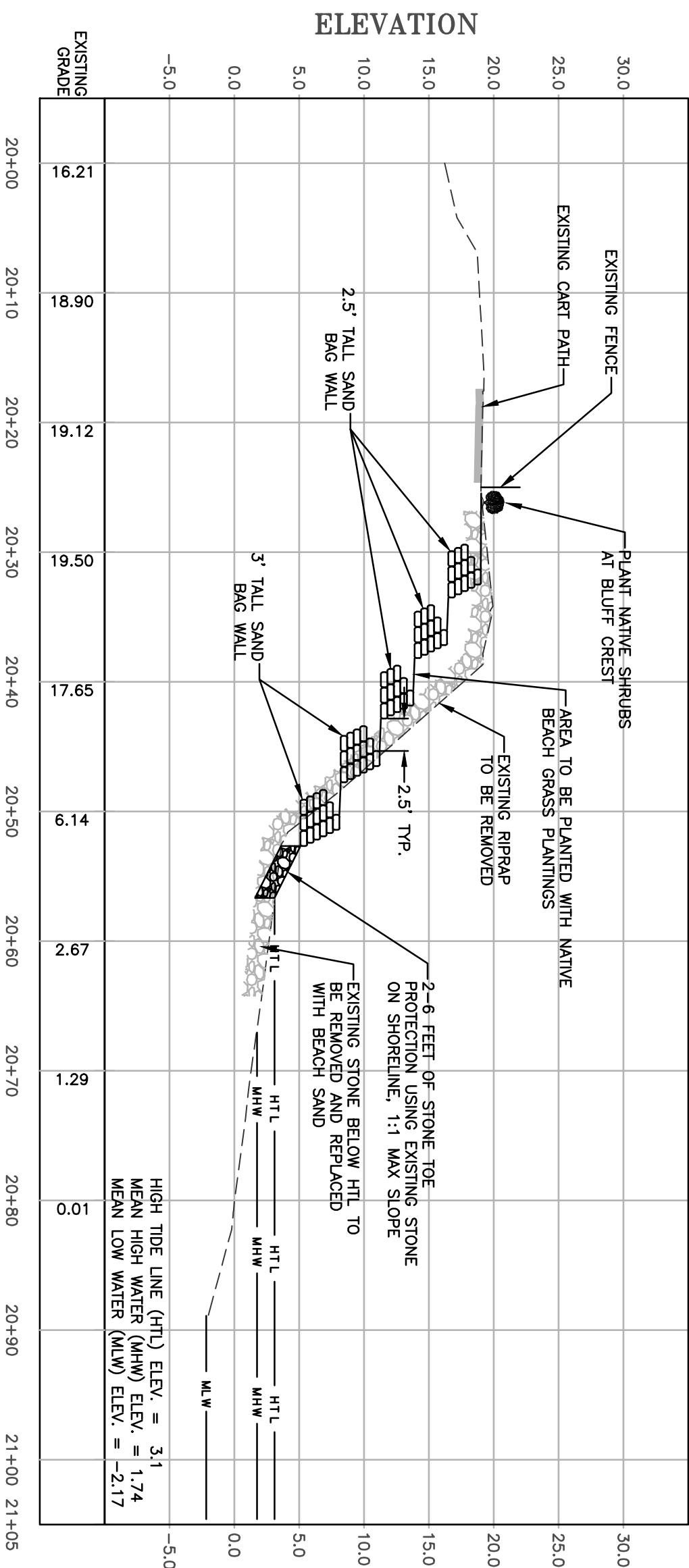
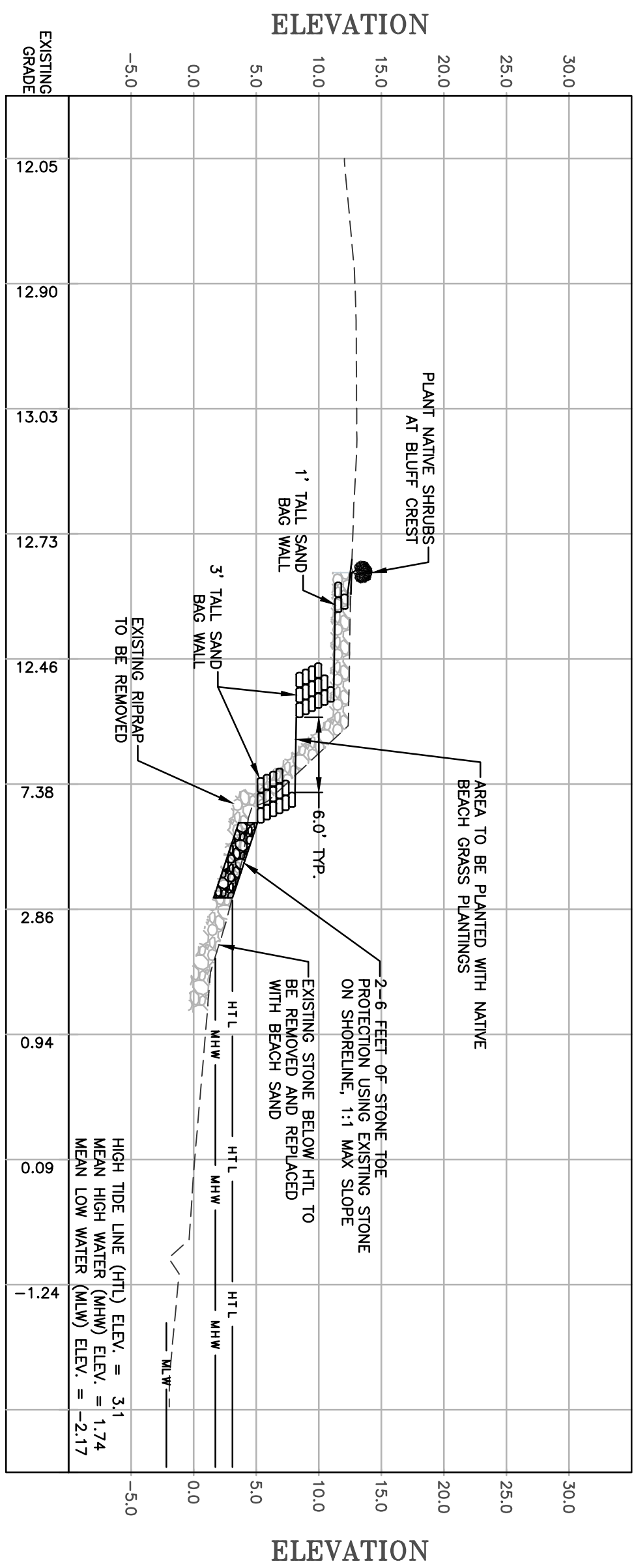
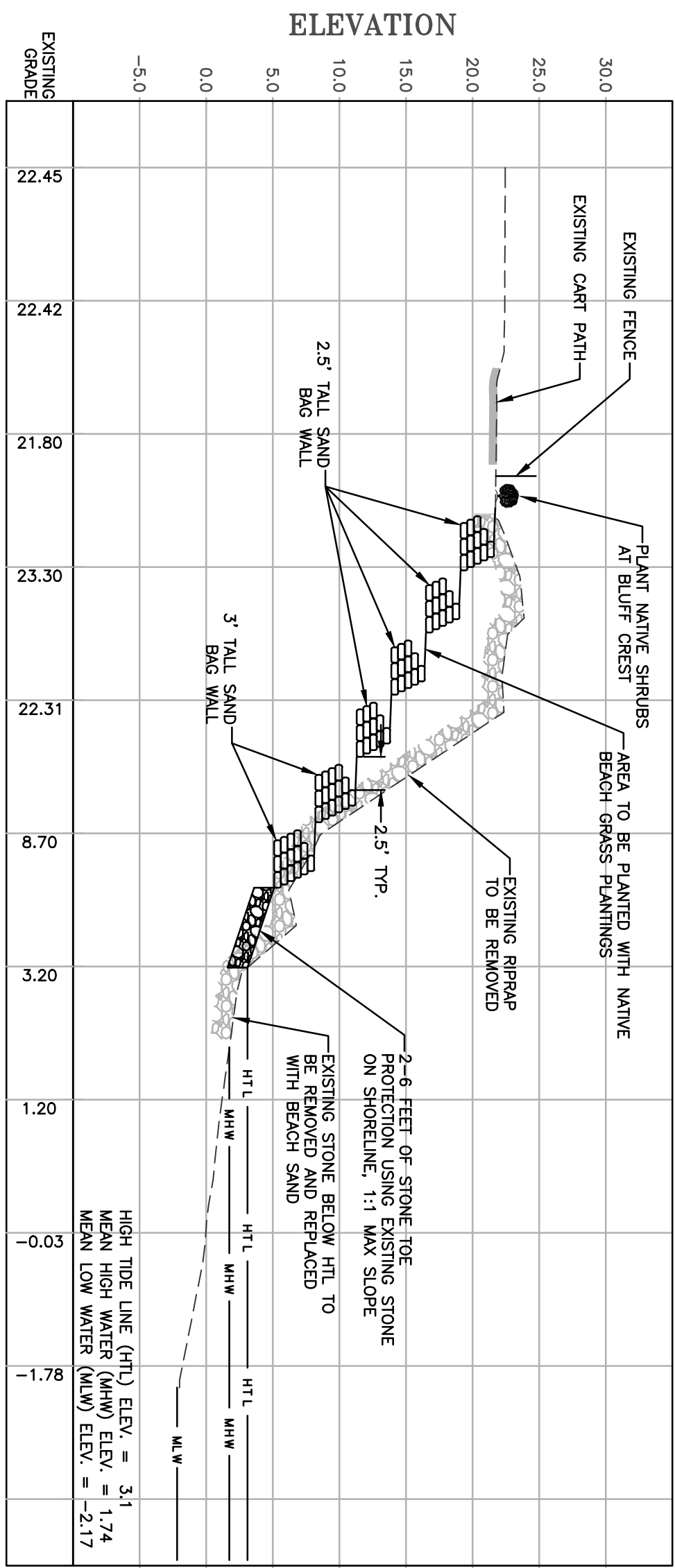
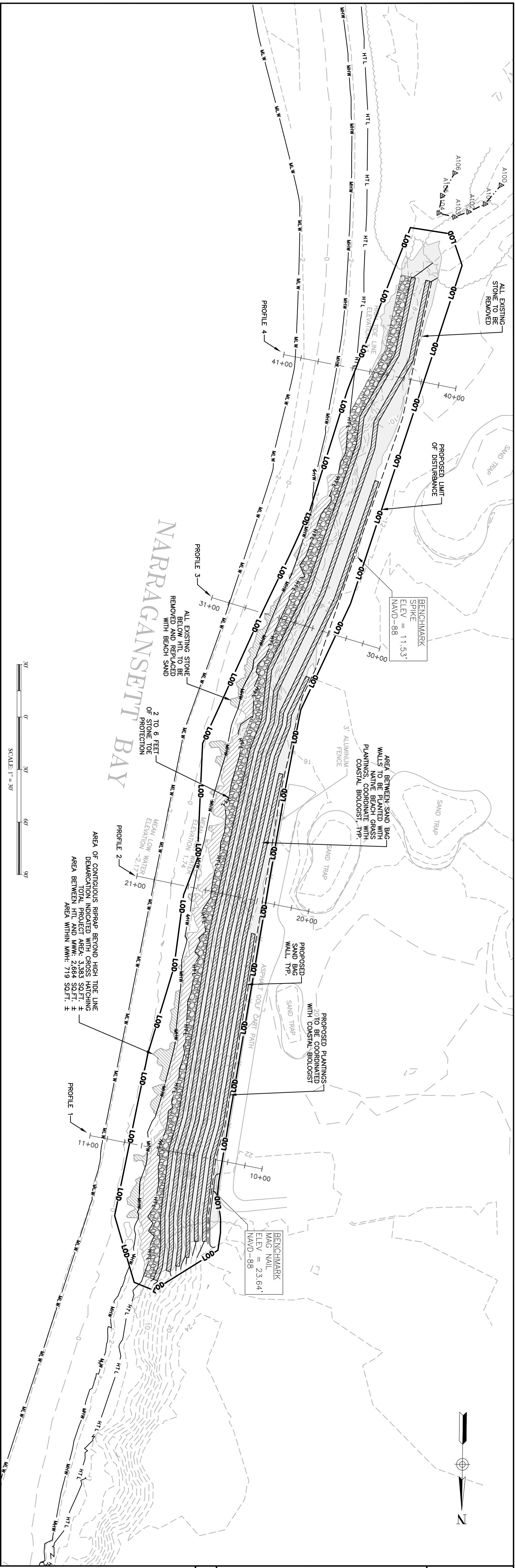
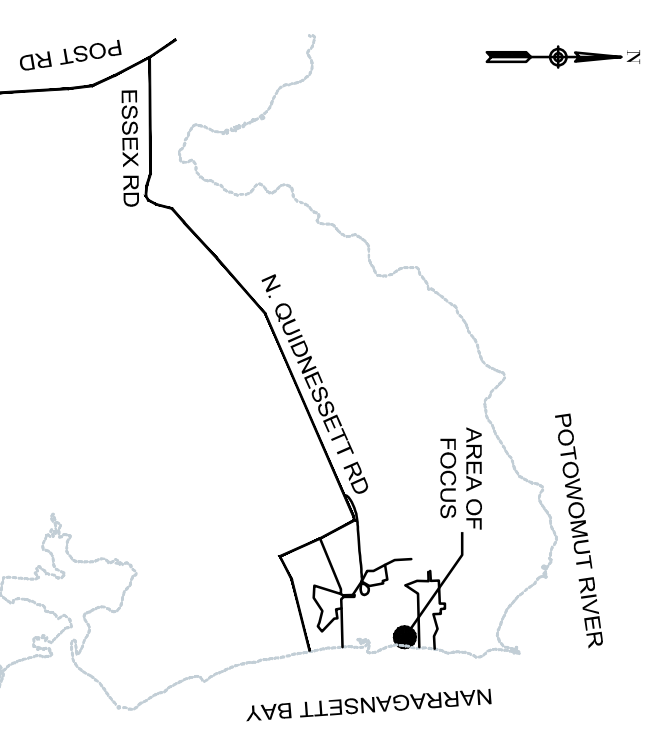
**CHERENZIA
& ASSOCIATES, LTD.**

99 Machine St.
Pawcatuck, CT 06259
Tel. 861.629.6500
Fax. 861.599.6006

P.O. Box 513
Westport, RI 02891
Tel. 401.596.7747

**Environmental Engineers
Land Use Planners
Land Surveyors
Civil Engineers**

www.cherenzia.com



ISSUED FOR REVIEW

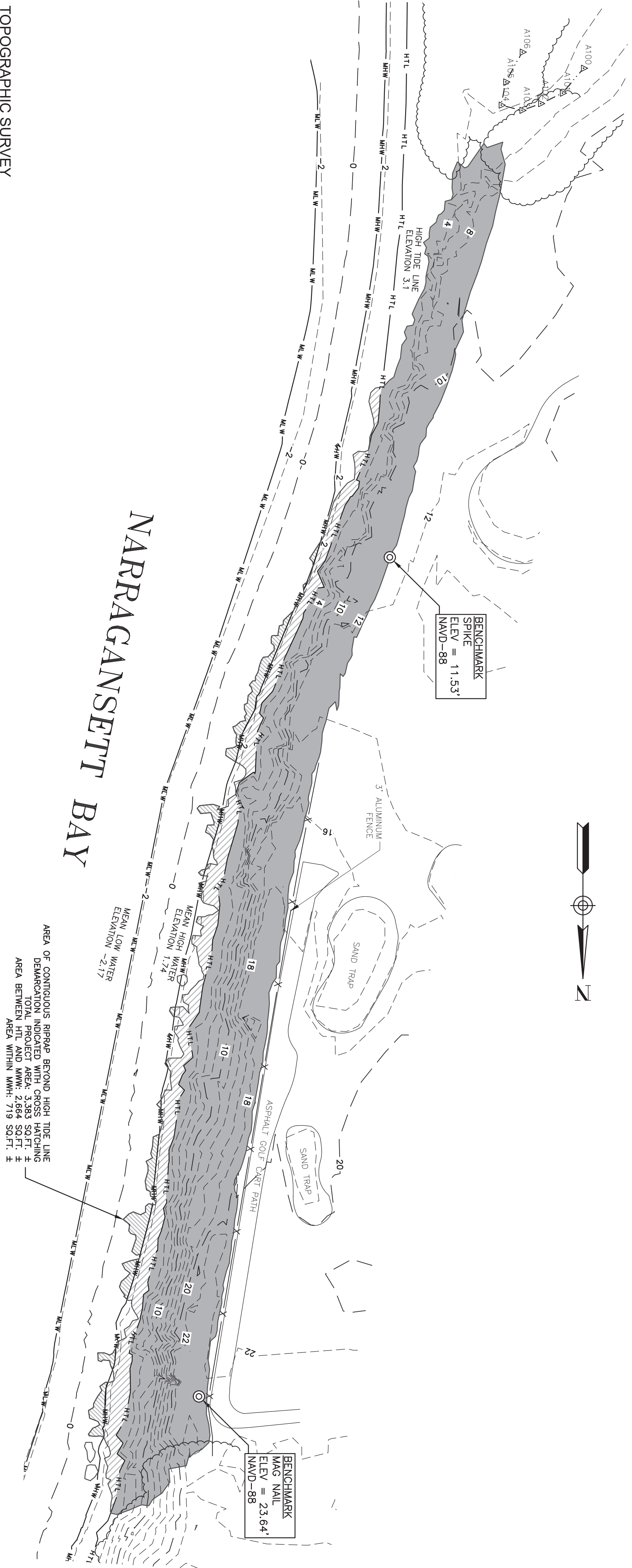
COASTAL RESTORATION PLAN

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

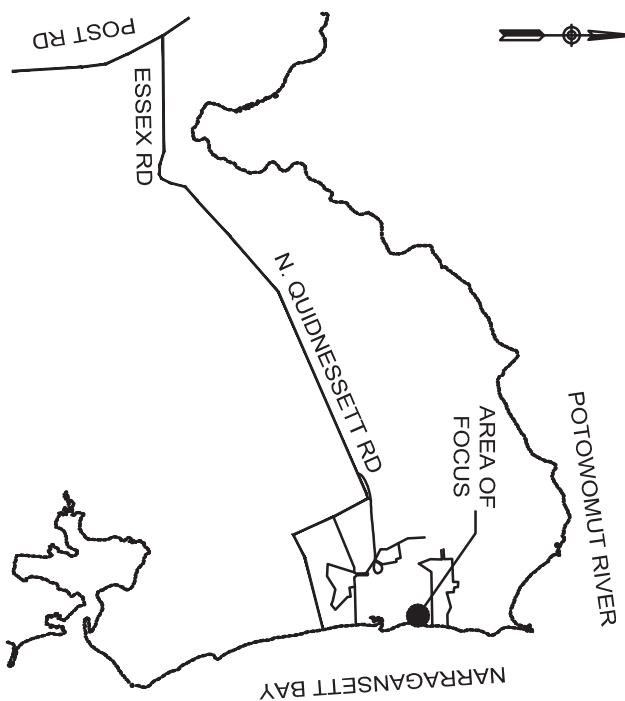
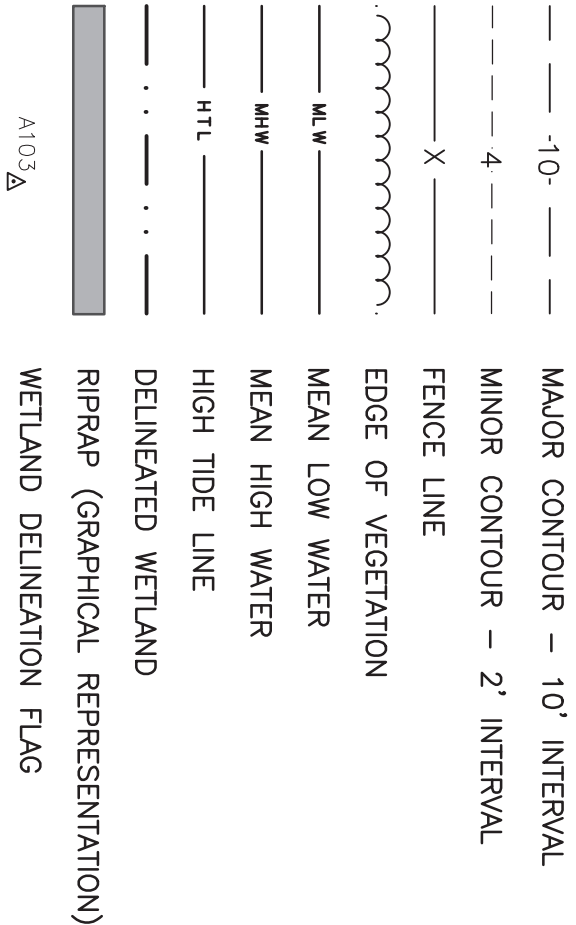
PREPARED FOR
QUIDNESSETT COUNTRY CLUB



TOPOGRAPHIC SURVEY
SCALE 1"=30'



LEGEND



LOCATION MAP

**CHERENZIA
& ASSOCIATES, LTD.**

99 Main Street
Pawcatuck, CT 06259
Tel: 860.570.0090

P.O. Box 513
Westport, RI 02891
Tel: 401.596.7147

www.cherenzia.com

Civil Engineers
Land Surveyors
Environmental Engineers

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 "JRL", KINGSTON, RI, & GEOD MODEL GEOD18.
- LIMITS OF FIELD TOPOGRAPHY SHOWN HEREON REPRESENTS INFORMATION GATHERED FROM FIELD SURVEYS CONDUCTED BY CHERENZIA & ASSOCIATES, LTD ON 05/14/24, 06/05/24, 07/17/24.
- SOURCE OF MEASUREMENT DATA IS BASED UPON CONVENTIONAL FIELD SURVEYING GROUND OBSERVATIONS AND THE USE OF UNMANNED AERIAL SYSTEMS (UAS) EQUIPPED WITH A HESAI PAIDAR X132 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-00-19 OF THE RULES AND REGULATIONS ADOPTED BY THE RHODE ISLAND STATE BOARD OF REGISTRATION FOR PROFESSIONAL LAND SURVEYORS ON NOVEMBER 29, 2019, AS FOLLOWS:

TYPE OF SURVEY: MEASUREMENT SPECIFICATION:
DATA ACCUMULATION-PLANIMETRICS TOPOGRAPHY CLASS III
CLASS I-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:

PLS SIGNATURE

MARK A. CASTELLANOS PLS #2511

PRINTED PLS NAME & LICENSE NO.

LS.0004133-COA

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

SCALE: 1"=20'	DRAWN BY: JF
CA JOB #224031	CHECKED BY: MAC
DATE: JUNE 7, 2024	

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

PROFESSIONAL
LAND SURVEYOR

SV-1



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

(401) 783-3370
Fax (401) 783-3767

September 3, 2024

Via Email
Quidnessett Country Club, Inc.
PO Box 860
East Greenwich, RI 02818

RE: CRMC Cease & Desist Order 23-0185, dated August 28, 2023
Plat 167, Lot 2, 950 North Quidnessett Road, North Kingstown

Dear Attorney Cervenka,

The coastal restoration plan and associated narrative prepared by Cherenzia & Associates, LTD., dated August 16, 2024 (the Plan) submitted on August 16, 2024, are not acceptable for the following reasons:

- The Plan does not propose removal of all unauthorized riprap and fill. The proposed location of the "stone toe protection" can extend no farther seaward than the location of the toe of bluff prior to unauthorized riprap installation (CRMP §1.2.2 (G.3.d)). The size of the existing stone to be utilized for toe protection shall be shown on any subsequent submitted plans. The existing stone shall be the stone that was in place prior to the violation. Include details of depth of toe protection.
- The proposed native beach grass plantings are inadequate for stabilizing the proposed slope. Native shrubs with a minimum 3-gallon container size are required.
- The proposed sandbags must be constructed of a biodegradable material and identified as such on the restoration plan.
- The Plan must detail appropriate erosion and sedimentation controls to be utilized throughout the restoration process.
- Additionally, the Plan must include the following:
- An Operations Plan for the removal of stones and an Operations Plan for the Restoration of the embankment, containing the following minimum details:
 - Detail construction access
 - Equipment to be used
 - Staging Areas
 - Methods for removal of stone, detailing how the existing embankment is to be protected during removal, including:
 - Disposal of stones
 - Placement of toe stones
 - Erosion and Sedimentation Control methods
 - Biweekly monitoring reports, which are to be sent to CRMC enforcement staff.

In order to avoid further enforcement action, a complete, acceptable restoration plan, must be submitted by September 20, 2024. Please feel free to contact me with any questions in the interim.

Sincerely,



Brian A. Harrington, Environmental Scientist
Coastal Resources Management Council

Certified Mail
70192282000049491666



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

September 20, 2024

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:

This is being provided in response to your letter dated September 3, 2024. As indicated in previous correspondence to the agency, QCC reserves its rights to pursue its Water Type Change Petition, CRMC File No. 2024-04-071, (and, if approved, a Category B shoreline protection application), and objects to restoration of the bluff pending the outcome on that Petition.¹ As you know, the agency's recommended and approved use of biodegradable materials and vegetation failed to arrest significant erosion next to the 14th hole and catastrophically failed in 2022. Given this history, to insist upon its re-installation is both arbitrary and capricious, and contrary to NOAA guidance. It also risks irreversible damage to the golf course and injury to players.

Subject to the above, attached is an updated restoration plan narrative and plan from Cherenzia & Associates, Ltd., which together provide clarification and additional detail responsive to information requested in your September 3, 2024 letter.

¹ The Petition is the subject of proposed rulemaking. In addition to public comment already received, per notice dated September 9, 2024, it will be reviewed at the Council's Planning and Procedures Subcommittee next Tuesday, September 24, 2024.

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

Sincerely,

A handwritten signature in blue ink, appearing to read 'J.R. Cervenka', with a stylized, cursive script.

Jennifer R. Cervenka

Attachments

cc: Janice Mathews, QCC
Sergio Cherenzia, Cherenzia & Associates, Ltd.
Joseph Klinger, Ecotones, Inc.
Anthony DeSisto, CRMC Chief Legal Counsel
Jeffrey M. Willis, CRMC Executive Director



**CHERENZIA
& ASSOCIATES, LTD.**

Civil Engineers • Land Surveyors
Land Use Planners • Environmental Consultants

Raymond F. Cherenzia, P.E., L.S., Founder
Sergio F. Cherenzia, P.E., President

September 20, 2024

Brian A. Harrington, Environmental Scientist
RI CRMC
Oliver H. Stedman Government Center
4808 Tower Hill Rd, Suite 3
Wakefield, RI 02879-1900

Subject: Response to Comments- CRMC Cease & Desist Order 23-0185
Quidnessett Country Club
950 North Quidnessett Rd
N Kingstown, RI
AP 167 Lot 2

Dear Mr. Harrington:

Cherenzia & Associates, Ltd. (Cherenzia) has reviewed the above-referenced Comment Letter dated September 3, 2024 and offers our responses to these comments below. Revised documents based on these comments are included with this resubmittal and are listed below:

- a. Site Plans (24" x 36") titled, "Quidnessett Country Club" Sheets C-1 through C-2, prepared by Cherenzia & Associates, Ltd., dated August 16, 2024, revised September 20, 2024 and Existing Conditions Plan prepared by Cherenzia & Associates, Ltd. Dated June 7, 2024, revised July 23, 2024.

REVIEW COMMENTS:

1. *The coastal restoration plan and associated narrative prepared by Cherenzia & Associates, LTD., dated August 16, 2024 (the Plan) submitted on August 16, 2024, are not acceptable for the following reasons:*
 - *The Plan does not propose removal of all unauthorized riprap and fill. The proposed location of the "stone toe protection" can extend no farther seaward than the location of the toe of bluff prior to unauthorized riprap installation (CRMP §1.2.2 (G.3.d)). The size of the existing stone to be utilized for toe protection shall be shown on any subsequent submitted plans. The existing stone shall be the stone that was in place prior to the violation. Include details of depth of toe protection.*

Response to Comment: The callout identifying all existing stone shall be removed has been revised to state that all unauthorized riprap and fill shall be removed. The previous extent of the toe of the bluff has been estimated based on the spring 2022 aerial and is shown on the plan. The proposed restoration has been revised to be upgradient from this line. The existing stone is

now identified as less than 2 cubic feet in size and the toe protection depth shall not be deeper than the mean low water elevation similar to the previous CRMC approval 2013-03-133.

- *The proposed native beach grass plantings are inadequate for stabilizing the proposed slope. Native shrubs with a minimum 3-gallon container size are required.*

Response to Comment: The plan has been revised to include shrubs between the sand bags and the minimum size has been added to all callouts for shrubs.

- *The proposed sandbags must be constructed of a biodegradable material and identified as such on the restoration plan.*

Response to Comment: All references to the sand bags now refer to them as biodegradable.

- *The Plan must detail appropriate erosion and sedimentation controls to be utilized throughout the restoration process.*

Response to Comment: A Soil Erosion and Sediment Control Plan has been prepared for the project.

2. *Additionally, the Plan must include the following:*

- *An Operations Plan for the removal of stones and an Operations Plan for the Restoration of the embankment, containing the following minimum details:*
 - *Detail construction access*
 - *Equipment to be used*
 - *Staging Areas*
 - *Methods for removal of stone, detailing how the existing embankment is to be protected during removal, including:*
 - *Disposal of stones*
 - *Placement of toe stones*
 - *Erosion and Sedimentation Control methods*
 - *Biweekly monitoring reports, which are to be sent to CRMC enforcement staff.*

Response to Comment: A Soil Erosion and Sediment Control Plan has been prepared for the project which includes these notes.

I trust that these responses adequately address the comments received. Should you have any additional questions or concerns, please do not hesitate to contact me at 401-596-7747.

Sincerely,



Sergio F. Cherenzia, P.E.
President



LOCATION MAP

- COUNTY CLUB DATED JUNE 7, 2024 REVISED JULI 23, 2024.

--	--	--	--

DATE: AUG. 16, 2024

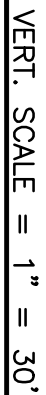
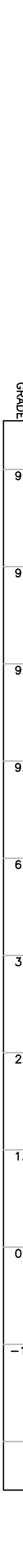
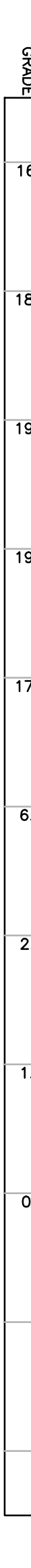
ISSUED FOR REVIEW

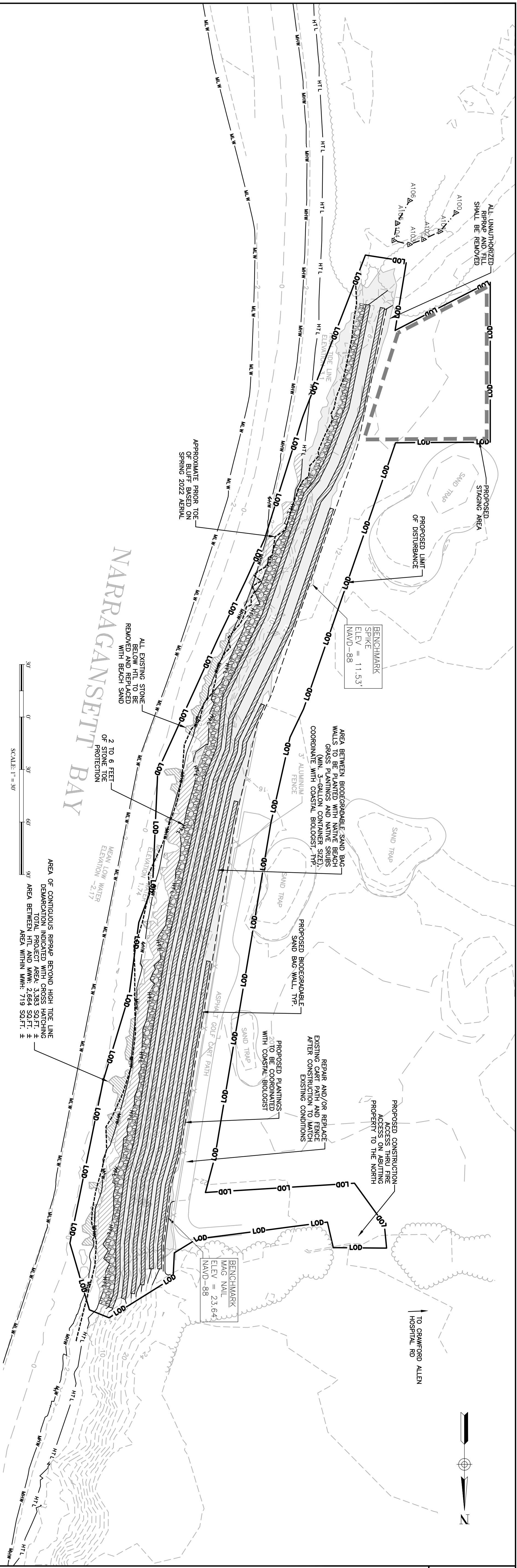
COASTAL RESTORATION PLAN

QUIDNESSETT COUNTRY CLUB

NORTH KINGSTOWN, RHODE ISLAND

QUIDNESSETT COUNTRY CLUB





PLAN REVISIONS			
REV. NO.	DATE	DESCRIPTION	DESIGNED BY CHKD BY
1	9/20/24	CRMC COMMENTS	AKG SFC

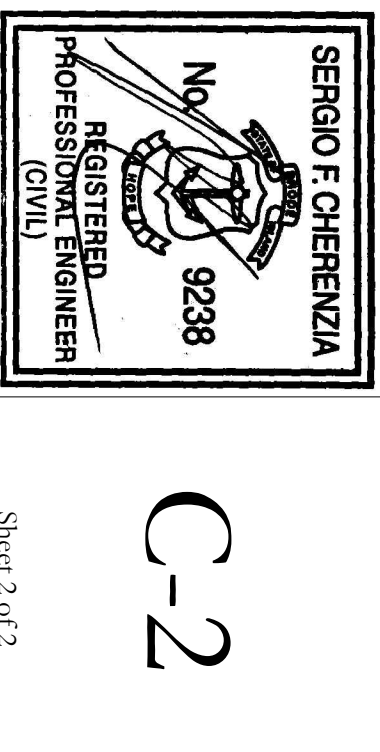
SCALE: AS NOTED	DRAWN BY: AKG
CAJOB # 224031	CHECK BY: SFC
DATE: AUG. 16, 2024	

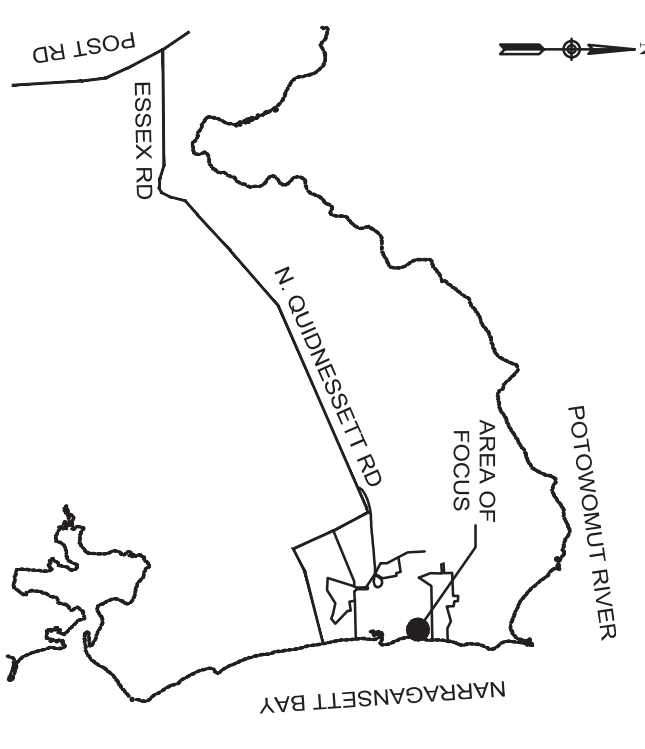
ISSUED FOR REVIEW

SOIL EROSION AND SEDIMENT CONTROL PLAN

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

PREPARED FOR
QUIDNESSETT COUNTRY CLUB





LOCATION MAP

PLAN REVISIONS				DATE	DESCRIPTION	BY	CHK
1	7-3-24	HIGH TIDE LINE, WETLAND	MC	MC			
1	7-23-24	UPDATED TOPOGRAPHY	JF	MC			

SCALE: 1"=20'	DRAWN BY: JF
CA JOB #224031	CHECKED BY: MAC
DATE: JUNE 7, 2024	

EXISTING CONDITIONS PLAN

DATA ACCUMULATION SURVEY

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

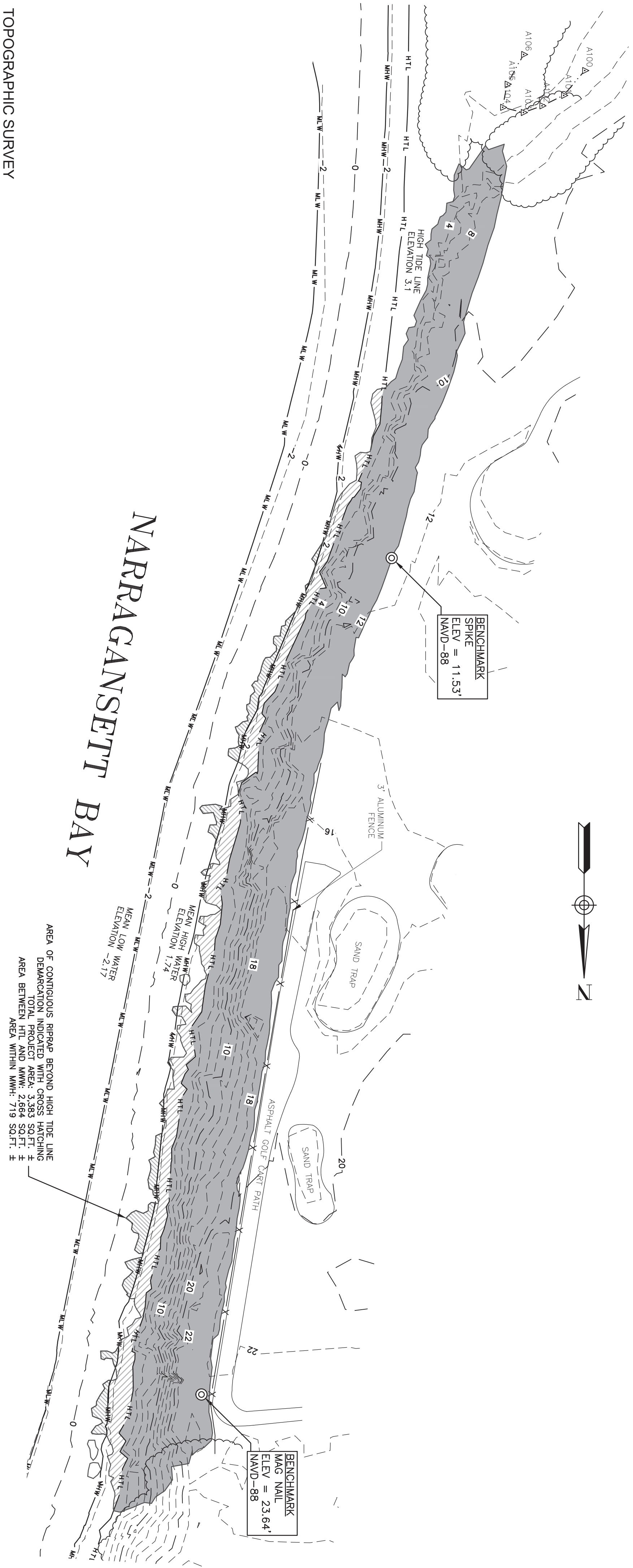
PREPARED FOR
QUINNESSETT COUNTRY CLUB

MARK A. CASTELLANOS
P.L.S. SIGNATURE
MARK A. CASTELLANOS
P.L.S. #2511
PRINTED P.L.S. NAME & LICENSE NO.
LS.0004133-COA

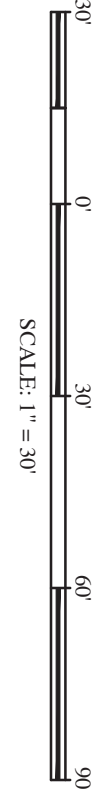
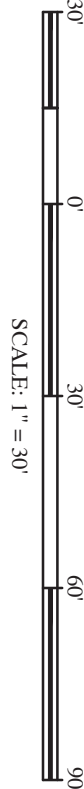
SV-1

SHEET 1 OF 1

- LEGEND**
- MAJOR CONTOUR - 10' INTERVAL
 - MINOR CONTOUR - 2' INTERVAL
 - FENCE LINE
 - EDGE OF VEGETATION
 - MEAN LOW WATER
 - MEAN HIGH WATER
 - HIGH TIDE LINE
 - DELINEATED WETLAND
 - RIPRAP (GRAPHICAL REPRESENTATION)
 - WETLAND DELINEATION FLAG



TOPOGRAPHIC SURVEY
SCALE 1"=30'



ORTHOMOSIAC
SCALE 1"=30'
IMAGE DATE JULY 17, 2024

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 "JRL", KINGSTON, RI, & GEOD MODEL GEOD18.
- 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 GNS OBSERVATIONS AND THE USE OF UNMANNED AERIAL SYSTEMS (UAS) EQUIPPED WITH A HESAI PAIDAR X132 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-00-19 OF THE RULES AND REGULATIONS ADOPTED BY THE RHODE ISLAND STATE BOARD OF REGISTRATION FOR PROFESSIONAL LAND SURVEYORS ON NOVEMBER 29, 2019, AS FOLLOWS:

TYPE OF SURVEY: MEASUREMENT SPECIFICATION:
DATA ACCUMULATION-PLANIMETRICS
TOPOGRAPHY CLASS III
CLASS I-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:

MAC

P.L.S. SIGNATURE
MARK A. CASTELLANOS
P.L.S. #2511
PRINTED P.L.S. NAME & LICENSE NO.
LS.0004133-COA



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

(401) 783-3370
Fax (401) 783-3767

October 11, 2024

Via Email
Quidnessett Country Club, Inc.
PO Box 860
East Greenwich, RI 02818

RE: CRMC Cease & Desist Order 23-0185, dated August 28, 2023
Plat 167, Lot 2, 950 North Quidnessett Road, North Kingstown

Dear Attorney Cervenka,

As per my letters to you dated May 22nd, 2024 and August 2nd, 2024, Quidnessett Country Club, Inc. (QCC) is required to submit a proposed restoration plan prepared by a qualified professional that addresses the following:

- Removal of all unauthorized riprap and fill.
- Nonstructural stabilization of the coastal feature (reference Coastal Resources Management Program, section 1.3.1.G).
- Proposed native shrub and tree plantings, of appropriate size and density, throughout all areas of previously vegetated natural buffer zone.
- Restoration must also receive approval from the Army Corps of Engineers.

In your letter to me dated September 20th, 2024, you state, "As you know, the agency's recommended and approved use of biodegradable materials and vegetation failed to arrest significant erosion next to the 14th hole and catastrophically failed in 2022. Given this history, to insist upon its re-installation is both arbitrary and capricious, and contrary to NOAA guidance. It also risks irreversible damage to the golf course and injury to players." To be perfectly clear, the CRMC at no time has insisted upon the re-installation of the previously authorized coir log structure. Furthermore, it is incumbent upon the QCC to ensure the safety of players at all times, including during the restoration process.

The coastal restoration plan and associated narrative prepared by Cherenzia & Associates, LTD., dated September 20, 2024 (the Plan) submitted on September 20, 2024, are not acceptable for the following reasons:

- The proposed profiles shown on the restoration plan appear to be acceptable, but the proposed location of the "stone toe protection" extends farther seaward than the previously authorized location of the toe of bluff. The proposed location of the

“stone toe protection” can extend no farther seaward than the location of the “proposed toe berm”, as approved by CRMC assent 2013-03-133, and shown on the plan titled “Quidnessett Country Club”, prepared by Diprete Engineering, dated March 12, 2013. The size of the existing stone to be utilized for toe protection shall be shown on any subsequent submitted plans. The existing stone shall be the stone that was in place prior to the violation. Include details of depth of toe protection.

- Page C-2, titled Soil Erosion and Sediment Control Plan, does not show the location of the erosion and sedimentation controls on the plan. All proposed erosion and sedimentation controls must be shown on the plan. Erosion and sedimentation controls must include the installation of turbidity barriers.

In order to avoid further enforcement action, a complete, acceptable restoration plan, must be submitted by November 1, 2024. Please feel free to contact me with any questions in the interim.

Sincerely,



Brian A. Harrington, Environmental Scientist III
Coastal Resources Management Council



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

November 1, 2024

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:

This letter is provided in response to your letter dated October 11, 2024, which included two comments on the proposed restoration plan by Cherenzia & Associates, LTD dated September 20, 2024.

First, you note that QCC's proposed stone toe protection "extends farther seaward than the previously authorized location of the toe of the bluff" and that it "can extend no farther seaward than the location of the proposed toe berm as approved by CRMC assent 2013-03-133, and shown on the plan titled 'Quidnessett Country Club', prepared by DiPrete Engineering, dated March 12, 2013." As depicted on the attached restoration plan as a red line, that approximate location is substantially landward of where QCC proposes to place the stone. If QCC were pushed back to this line, then there would be no room for the proposed terraced sandbag system (nor any other non-structural system) along approximately two-thirds of the bluff. The previously approved stone location was designed to protect burritos that were staggered on top of one another adjacent to the bluff. As you know, that system failed catastrophically. We are proposing a different shoreline protection system that is built out further seaward in a more gradual, terraced configuration. The proposed stone ends at an average of twelve feet from the mean high water line, thereby preserving lateral access. As noted in your letter, QCC must ensure the

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

safety of the players at all times and it simply cannot meet this objective with the 2013-approved toe of the berm line.

Given the above, we request that the agency reconsider its position on the location of the stone north of the plan's "Profile 3" line and accept the location that we have proposed in the attached Cherenzia plan (revised October 30, 2024). Use of the 2013 toe of the berm line to the south of the Profile 3 line does work for the proposed terraced sandbag system.

With respect to your second comment requesting that QCC show erosion and sedimentation controls on the plan, we have added a turbidity barrier. *See* attached revised plan from Cherenzia & Associates, Ltd. dated October 30, 2024.

As indicated in previous correspondence to the agency, QCC reserves its rights to pursue its Water Type Change Petition, CRMC File No. 2024-04-071, (and, if approved, a Category B shoreline protection application), and objects to restoration of the bluff pending the outcome of any CRMC proceedings.¹ To require QCC to situate its shoreline protection system based on 2013 toe of the berm line is arbitrary and capricious and eliminates any viable option for non-structural shoreline protection in that area.

Sincerely,

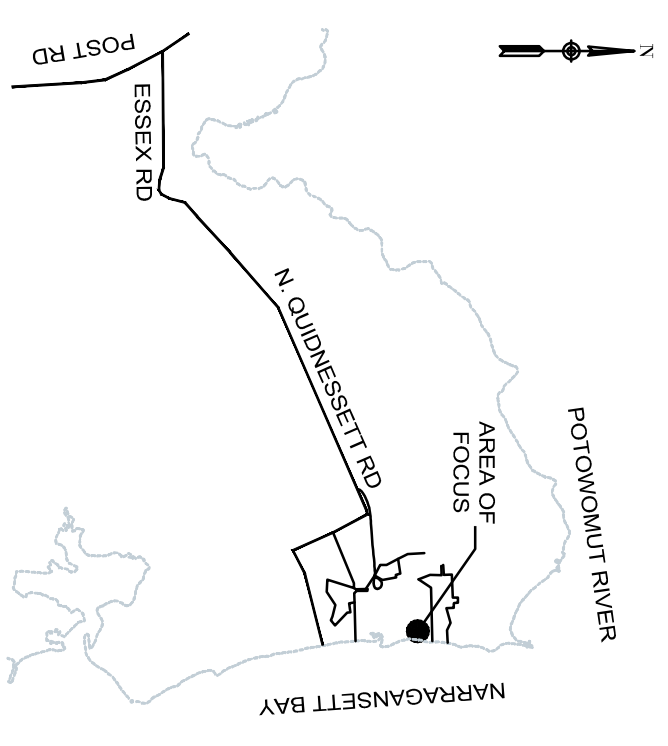
A handwritten signature in blue ink, appearing to read 'JRC', is written over a faint, larger blue outline of the same signature.

Jennifer R. Cervenka

Attachments

cc: Janice Mathews, QCC
Robin L. Main, Hinkley Allen
Sergio Cherenzia, Cherenzia & Associates, Ltd.
Joseph Klinger, Ecotones, Inc.
Anthony DeSisto, CRMC Chief Legal Counsel
Jeffrey M. Willis, CRMC Executive Director

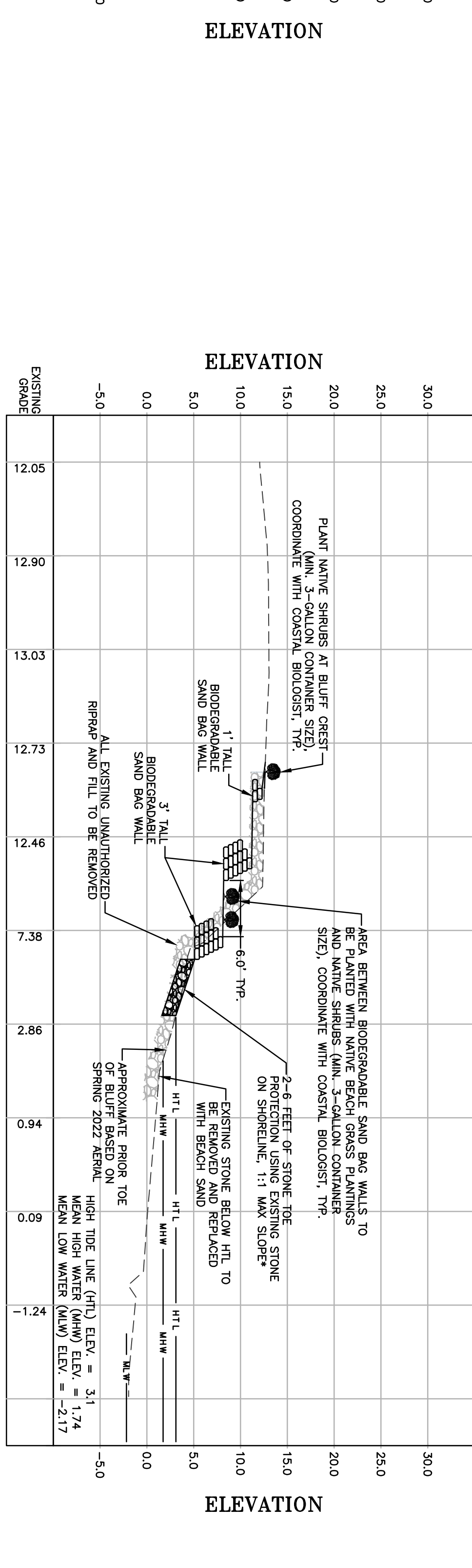
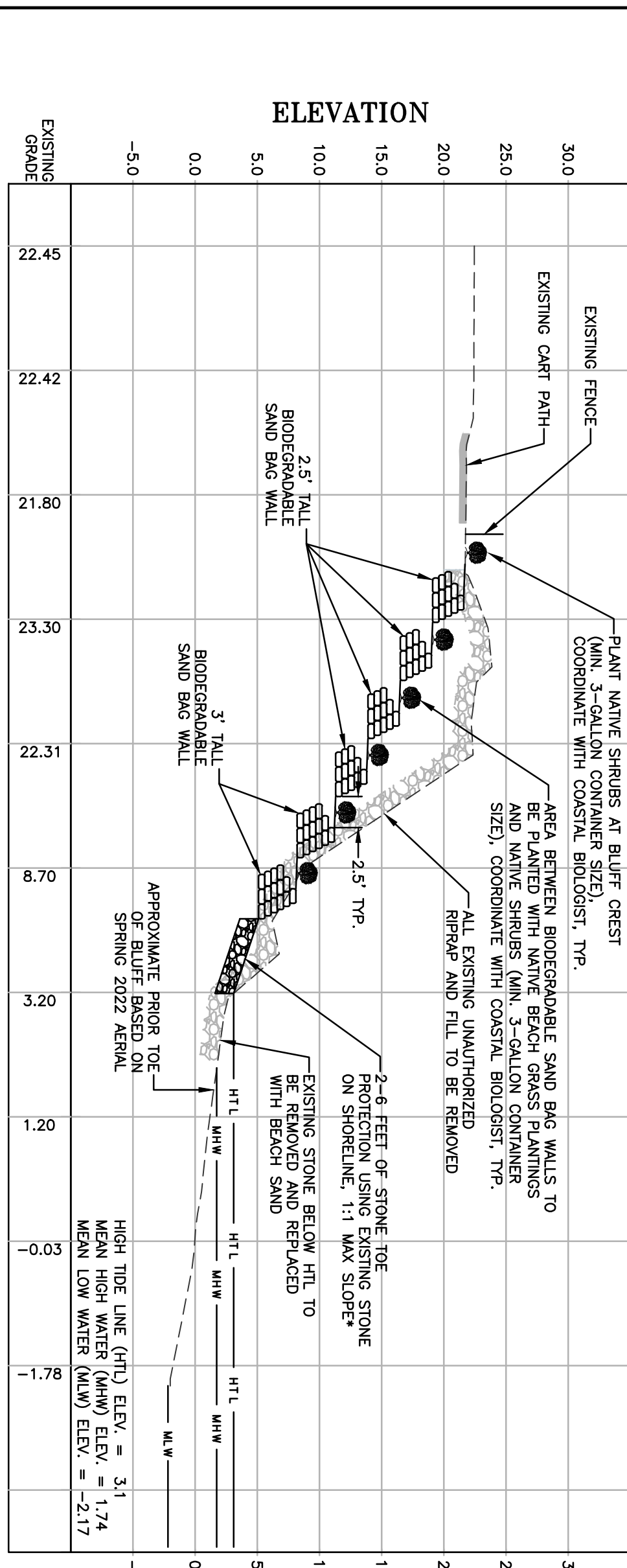
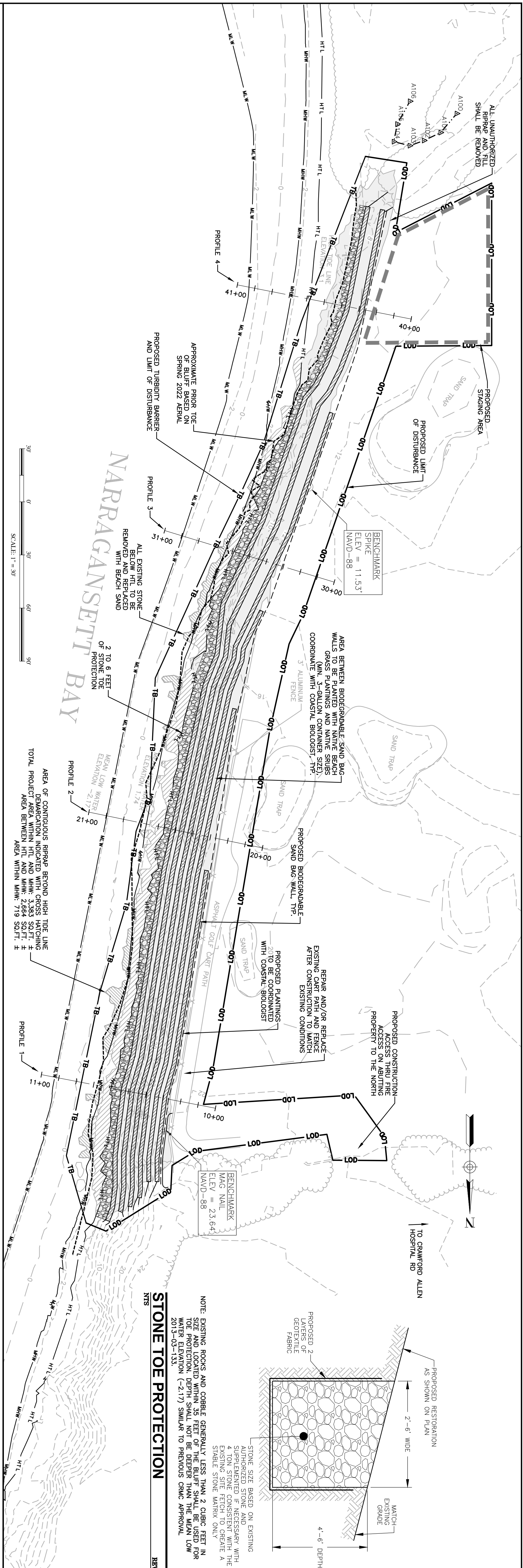
¹ At its September 24, 2024 meeting, the CRMC's Policy and Planning subcommittee voted to allow QCC to make a presentation with witnesses on the Water Type Change Petition at an upcoming meeting.



LOCATION MAP

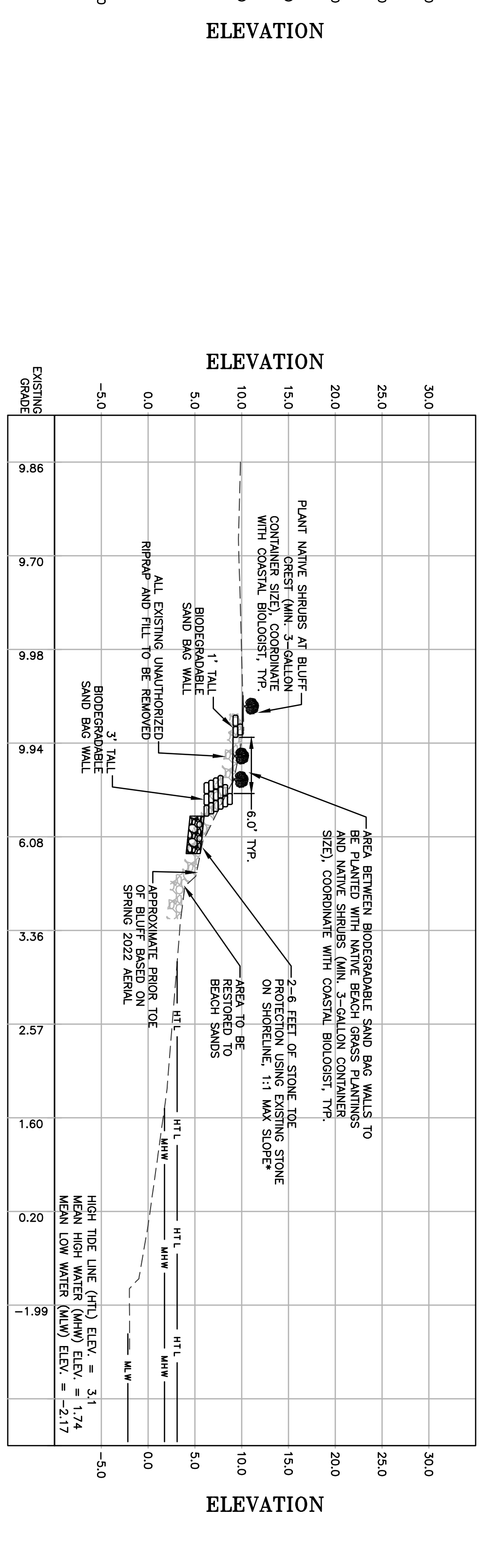
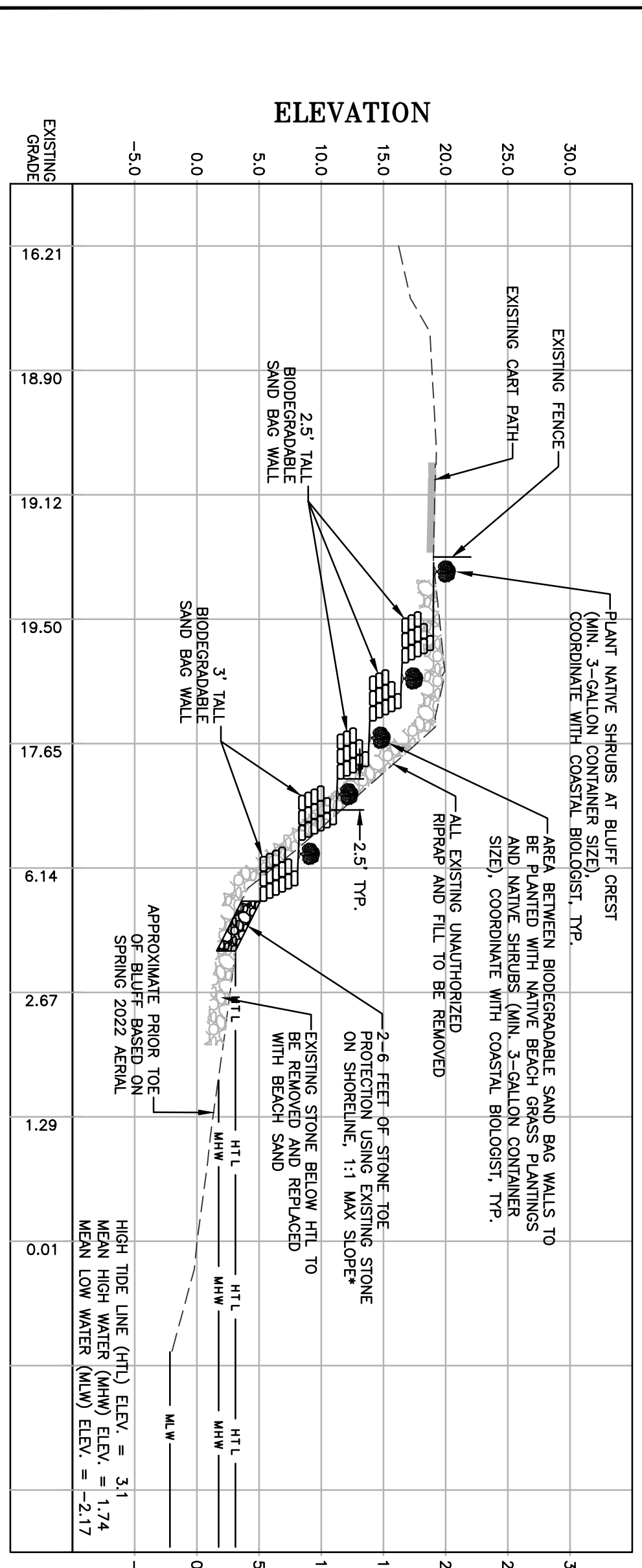
NOTE: EXISTING ROCKS AND CORBLE GENERALLY LESS THAN 2 CUBIC FEET IN SIZE AND LOCATED WITHIN 35 FEET OF THE BLUFF SHALL BE USED FOR PROTECTION. DEPTH SHALL NOT BE DEEPER THAN THE MEAN LOW WATER ELEVATION (-2.17) SIMILAR TO PREVIOUS CRMC APPROVAL 2013-03-133.

STONE TOE PROTECTION



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

PROFILE 2
HORIZ. SCALE: 1" = 10'
VERT. SCALE = 1" = 10'



PROFILE 3
HORIZ. SCALE: 1" = 10'
VERT. SCALE = 1" = 10'

PROFILE 4
HORIZ. SCALE: 1" = 10'
VERT. SCALE = 1" = 10'

COASTAL RESTORATION PLAN

QUIDDESSETT COUNTRY CLUB

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

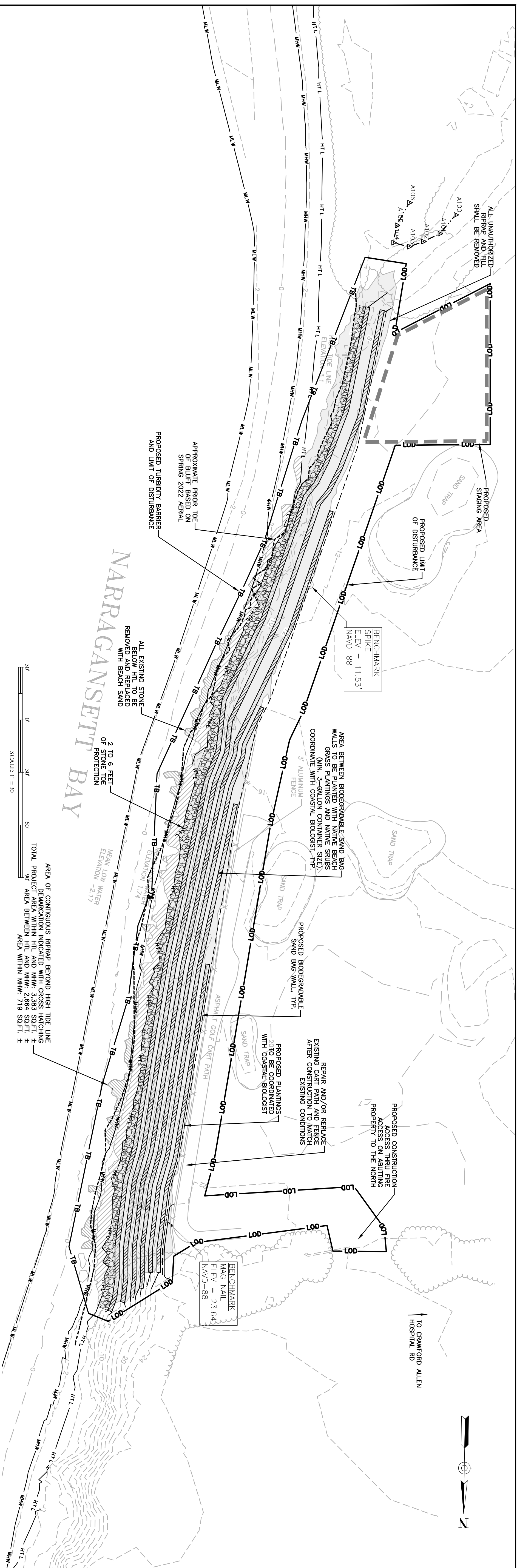
PREPARED FOR
QUIDDESSETT COUNTRY CLUB

DESIGNED BY
SERGIO F. CHERENZIA
REGISTERED PROFESSIONAL ENGINEER
No. 9298
CA JOB # 223031
DATE: AUG. 16, 2024

DRAWN BY: AKG
CHECK BY: SFC

C-1

Sheet 1 of 2



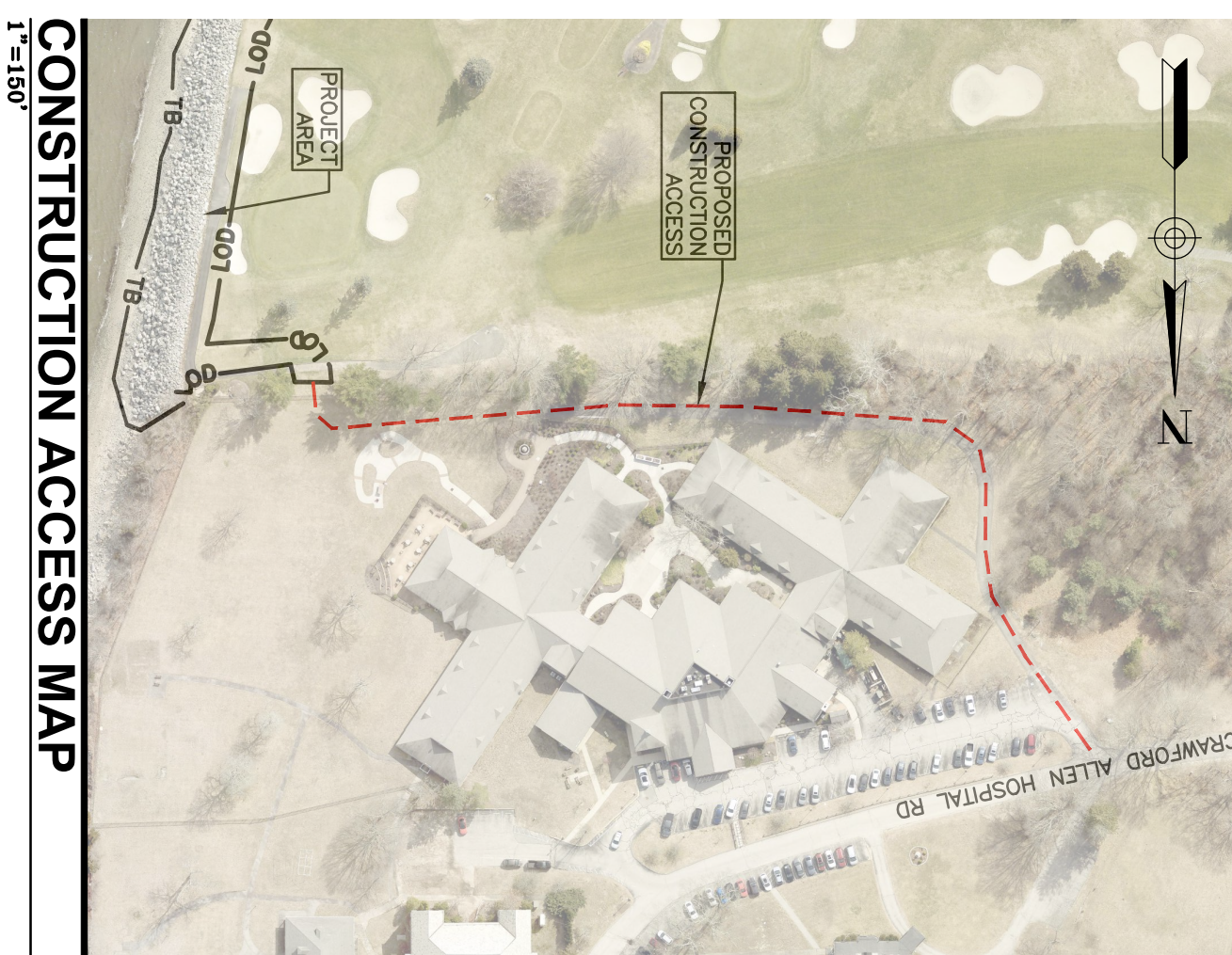
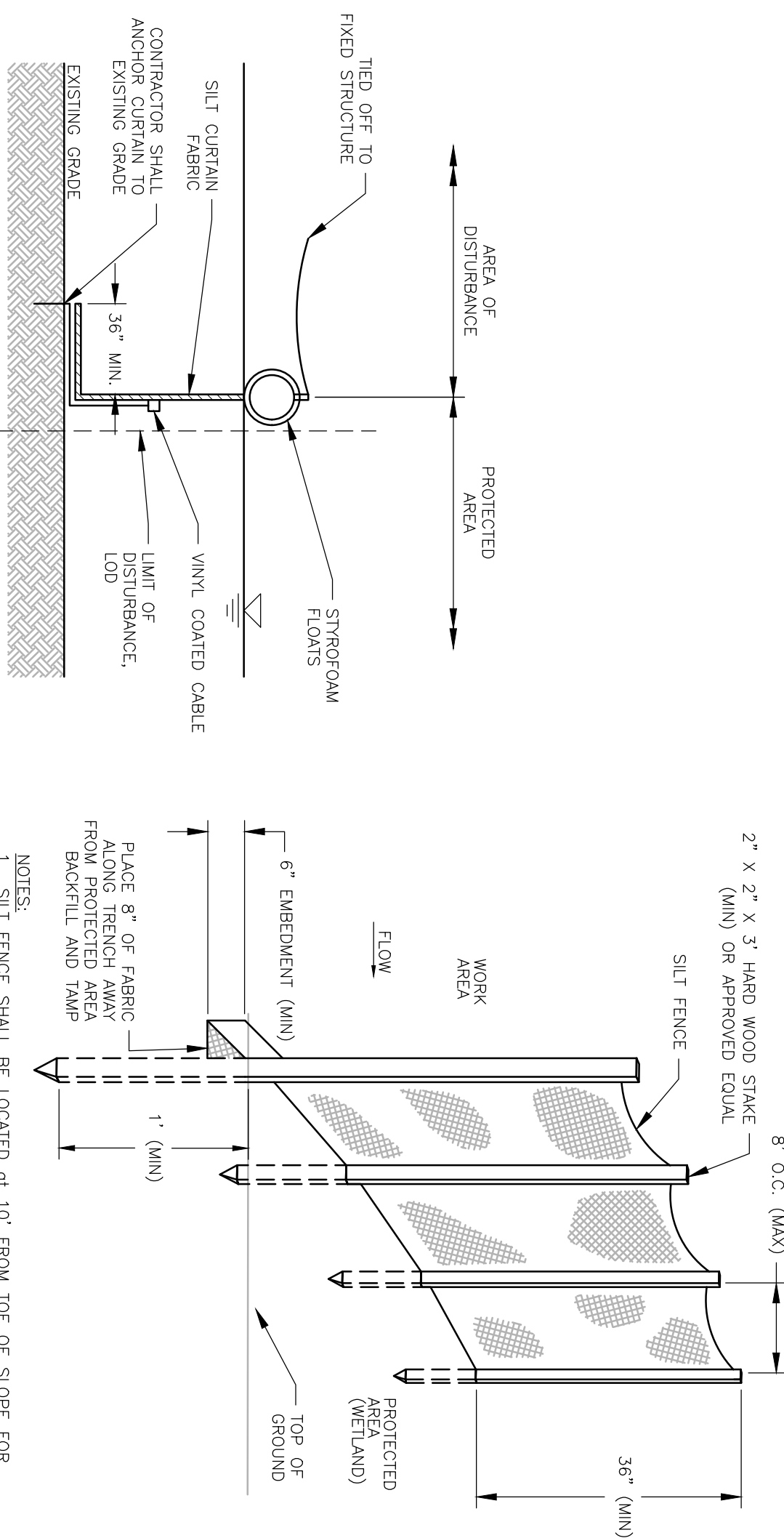
- SITE SPECIFIC DATA
1. TOTAL AREA OF DISTURBANCE = 0.98± ACRES

3. WATERSHED = WEST PASSAGE ID# R10007027E-03J, IMPAIRMENTS FOR DISSOLVED OXYGEN, NO TMDL

- ### EROSION CONTROLS/CONSTRUCTION SEQUENCING

1. THE CONTRACTOR SHALL NOTIFY ALL APPLICABLE AGENCIES AND INSTALL THE EROSION CONTROL MEASURES ON THESE PLANS IN ACCORDANCE WITH ALL FEDERAL, STATE AND LOCAL REQUIREMENTS.
2. THE CONTRACTOR SHALL KEEP A COPY OF THE APPROVED PLAN SET AT THE CONSTRUCTION SITE AT ALL TIMES.
3. THE CONTRACTOR SHALL INSTALL ALL EROSION AND SEDIMENTATION (EAS) CONTROL MEASURES SHOWN ON THE PLANS IN ACCORDANCE WITH THE SPEC PLAN AND ON THE MOST PROTECTIVE BASIS TO PREVENT SOIL EROSION AND SEDIMENT CONTROL. HANDBOOK.
4. THE CONTRACTOR SHALL BE RESPONSIBLE TO MAINTAIN AND/OR UPGRADE THESE MEASURES, AS NECESSARY, THROUGHOUT CONSTRUCTION, TO MEET THE REQUIREMENTS OF ALL RELATED PERMITS.
5. THE CONTRACTOR SHALL PREPARE AND MAINTAIN A RED-LINED COPY OF THE SITE PLANS SHOWING INTENDED AREAS FOR STORING, STOCKPILING, WASHOUT, SOIL WARE CONTAMINATION, AND EROSION/SEDIMENTATION CONTROL RESOURCES AT EACH CONSTRUCTION SITE. THESE AREAS SHALL BE FENCED OFF AND AREAS INTENDED FOR INFILTRATION PRACTICES.
6. EROSION CONTROL DEVICES
 - A. ROADS ADJACENT TO THE CONSTRUCTION SITE SHALL BE CLEAN AT THE END OF EACH WORK DAY.
 - B. SLOPES SHALL BE INSTALLED AROUND ALL EARTH EXCAVATIONS.
 - C. ALL OTHER EROSION CONTROL DEVICES SHOWN ON THESE PLANS SHALL BE IN ACCORDANCE WITH PROTECT ISLAND STORMWATER MANAGEMENT, DESIGN, AND INSTALLATION REQUIREMENTS.
7. RECORDING REQUIREMENTS
 - A. EXISTING GRAPPLER AND FILL SHALL BE REMOVED FROM THE EXISTING GULLY AND REINSTALLED ON THE TOP OF THE EXISTING GULLY.
 - B. THE BLUFF WORKING DOWN UNTIL ALL PREVIOUSLY IMPORTED MATERIAL IS REMOVED.
 - C. ALL PREVIOUSLY IMPORTED GRAPPLER AND FILL SHALL BE STOCKPILED FOR REUSE FOR THE TOP PROTECTION.
 - D. PROPOSED RESTORATION SHALL TAKE PLACE FROM THE BOTTOM OF THE BLUFF WORKING UPWARD TO THE TOP OF THE EXISTING BLUFF. THE RESTORATION SHALL CONSIST OF 2.0 FEET OF SOIL TO BE STOCKPILED AND REINSTALLED ON THE BLUFF AND AREAS PLANTED WITH NATIVE BEACH GRASSES AND SHRUBS.
 - E. THE CONTRACTOR SHALL COMPLY ON THE EXACT METHOD OF THE CONSTRUCTION SEDIMENTATION AND PHASING.
 - F. TOP OF BLUFF SHALL BE RESTORED TO MATCH EXISTING TOPOGRAPHY.
 - G. EQUIPMENT USED SHALL BE STOCKPILLED EXCAVATION EQUIPMENT SHALL BE STOCKPILLED ON THE EXISTING GULLY.
 - H. EQUIPMENT SHALL GENERALLY CONSIST OF AN EXCAVATOR WITH GRAPPLE AND BUCKET AND DUMP TRUCKS. EXACT EQUIPMENT WILL BE DETERMINED BY THE CONTRACTOR.
 - I. BLUFF ON THE EXISTING GULLY CORNER.
8. RECORDING REQUIREMENTS
 - A. EXISTING GRAPPLER AND FILL SHALL BE REMOVED FROM THE EXISTING GULLY AND REINSTALLED ON THE TOP OF THE EXISTING GULLY.
 - B. THE BLUFF WORKING DOWN UNTIL ALL PREVIOUSLY IMPORTED MATERIAL IS REMOVED.
 - C. ALL PREVIOUSLY IMPORTED GRAPPLER AND FILL SHALL BE STOCKPILED FOR REUSE FOR THE TOP PROTECTION.
 - D. PROPOSED RESTORATION SHALL TAKE PLACE FROM THE BOTTOM OF THE BLUFF WORKING UPWARD TO THE TOP OF THE EXISTING BLUFF. THE RESTORATION SHALL CONSIST OF 2.0 FEET OF SOIL TO BE STOCKPILED AND REINSTALLED ON THE BLUFF AND AREAS PLANTED WITH NATIVE BEACH GRASSES AND SHRUBS.
 - E. THE CONTRACTOR SHALL COMPLY ON THE EXACT METHOD OF THE CONSTRUCTION SEDIMENTATION AND PHASING.
 - F. TOP OF BLUFF SHALL BE RESTORED TO MATCH EXISTING TOPOGRAPHY.
 - G. EQUIPMENT USED SHALL BE STOCKPILLED EXCAVATION EQUIPMENT SHALL BE STOCKPILLED ON THE EXISTING GULLY.
 - H. EQUIPMENT SHALL GENERALLY CONSIST OF AN EXCAVATOR WITH GRAPPLE AND BUCKET AND DUMP TRUCKS. EXACT EQUIPMENT WILL BE DETERMINED BY THE CONTRACTOR.
 - I. BLUFF ON THE EXISTING GULLY CORNER.
9. MONITORING REQUIREMENTS
 - A. DAILY MONITORING REPORTS SHALL BE SENT TO CHANCEMAN/STAFF.
 - B. MONITORING SHALL BE CONDUCTED BY THE CONTRACTOR.

- OPERATIONS PLAN
1. CONSTRUCTION ACCESS SHALL BE FROM CHANDLER AVENUE, HASTINGS ROAD, EXISTING AND THE PARKING LOT TO THE WESTERN END OF THE PROJECT AREA. ACCESS SHALL BE FROM THE WESTERN TOWARD SOUTHERN SIDES OF THE CHURCH TO AN EXISTING FIRE PUMP ON THE PROJECT AREA.
2. IMPERMEOUS MATS OR OTHER SURFACED PROTECTION SHALL BE USED TO PROTECT EXISTING SURFACES BEFORE START OF CONSTRUCTION. THURLOPP BARBERS SHALL BE PLACED ON THE DOWN GRADIENT SIDE OF THE PROPOSED WORK.
3. EXISTING MATERIAL SHALL BE REMOVED FROM THE TOP OF THE BLUFF WORKING DOWN UNTIL ALL UNDERLIED IMPERMEABLE MATERIAL IS REMOVED.
4. ALL PREVIOUSLY IMPORTED GRAPPE AND FILL SHALL BE STOCKPILED FOR REUSE FOR THE TOP PROTECTION.
5. PROPOSED RESTORATION SHALL TAKE PLACE FROM THE BOTTOM OF THE BLUFF WORKING UPGRADIENT TO THE TOP OF THE BLUFF. THE RESTORATION SHALL BE COMPLETED WITHIN 60 DAYS OF THE START OF THE PROJECT AND SHALL BE PLANNED WITH NATIVE BEACH GRASSES AND SHRUBS.
6. THE CONTRACTOR SHALL COMPLY WITH THE EXACT METHOD OF CONSTRUCTION SEQUENCING AND PHASING.
7. TOP OF BLUFF SHALL BE RESTORED TO MATCH EXISTING.
8. EQUIPMENT USED SHALL BE STANDARD EXCAVATION EQUIPMENT. EQUIPMENT SHALL GENERALLY CONSIST OF AN EXCAVATOR WITH GRAPPLE AND BUCKET AND DUMP TRUCKS. EXACT EQUIPMENT SHALL BE COORDINATED BY THE CONTRACTOR.
9. BLUFF ON THE EXISTING GOLF COURSE
10. BLUFF ON THE EXISTING GOLF COURSE
- REPORTING REQUIREMENTS
1. BENCHMARK MONITORING REPORTS SHALL BE SENT TO CHANDLER AVENUE
2. ENVIRONMENTAL STAFF.



PLAN REVISIONS				
REV. NO.	DATE	DESCRIPTION	ISSUED BY	DATE
1	9/20/24	CRMC COMMENTS	AKG	SFC
2	10/30/24	CRMC COMMENTS	AKG	SFC

SCALE: AS NOTED
CAJOB # 224031
DATE: AUG. 16, 2024

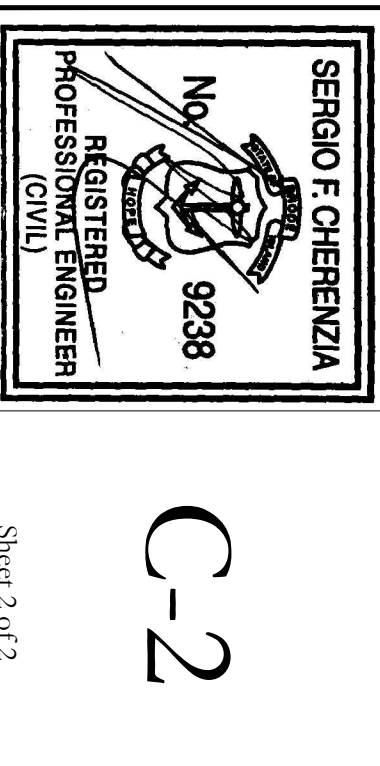
DRAWN BY: AKC
CHECK BY: SFC

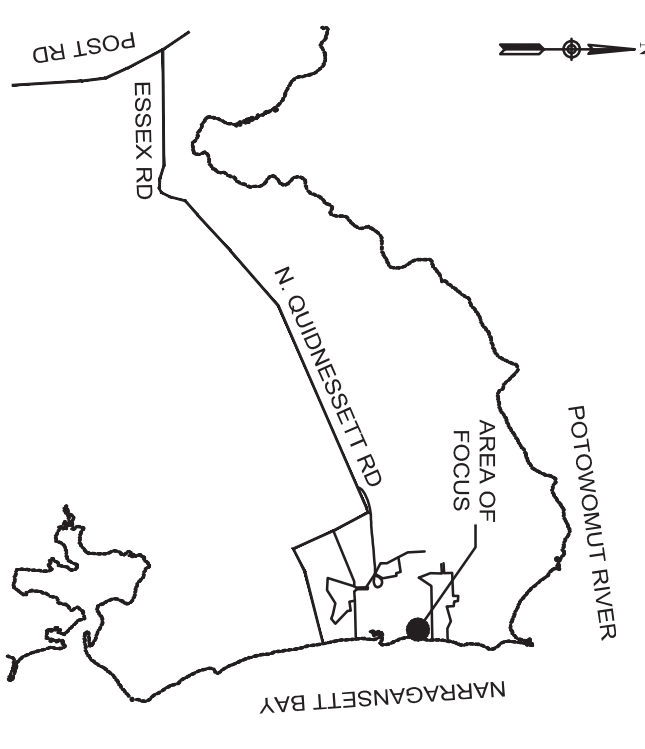
ISSUED FOR REVIEW

SOIL EROSION AND SEDIMENT CONTROL PLAN

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

PREPARED FOR
QUIDNESSETT COUNTRY CLUB



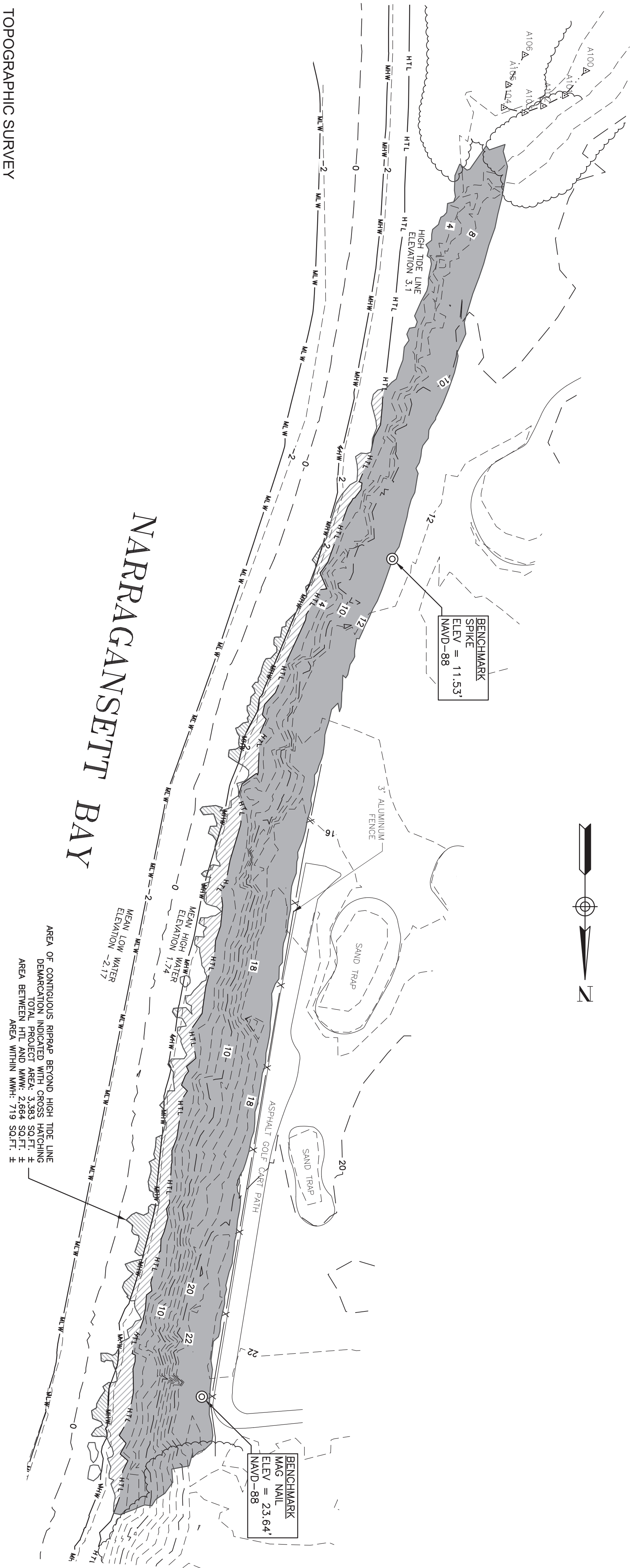


LOCATION MAP

- LEGEND**
- MAJOR CONTOUR - 10' INTERVAL
 - MINOR CONTOUR - 2' INTERVAL
 - FENCE LINE
 - EDGE OF VEGETATION
 - MEAN LOW WATER
 - MEAN HIGH WATER
 - HIGH TIDE LINE
 - DELINEATED WETLAND
 - RIPRAP (GRAPHICAL REPRESENTATION)
 - WETLAND DELINEATION FLAG



TOPOGRAPHIC SURVEY
SCALE 1"=30'



NOTES:

- ELEVATIONS ARE REFERENCED TO THE NORTH AMERICAN VERTICAL DATUM OF 1988 (NAVD-88). VERTICAL CONTROL DERIVED FROM GNSS OBSERVATIONS UTILIZING THE CIDIOT ACORN RTK NETWORK WITH CORS ID REFERENCE "JRL", KINGSTON, RI, & GEOD MODEL GEOD18.
- 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 GROUND OBSERVATIONS AND THE USE OF UNMANNED AERIAL SYSTEMS (UAS) 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-00-1.9 OF THE RULES AND REGULATIONS ADOPTED BY THE RHODE ISLAND STATE BOARD OF REGISTRATION FOR PROFESSIONAL LAND SURVEYORS ON NOVEMBER 29, 2019, AS FOLLOWS:

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

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:

PLS SIGNATURE

MARK A. CASTELLANOS PLS #2511

PRINTED PLS NAME & LICENSE NO.

LS.0004133-COA

PLAN REVISIONS			DATE	DESCRIPTION	BY	CHK
1	7-3-24	HIGH TIDE LINE WETLAND	JF	MC	MC	MC
1	7-23-24	UPDATED TOPOGRAPHY	JF	MC	MC	MC

SCALE: 1"=20'
CA JOB #224031
DATE: JUNE 7, 2024
DRAWN BY: JF
CHECKED BY: MAC

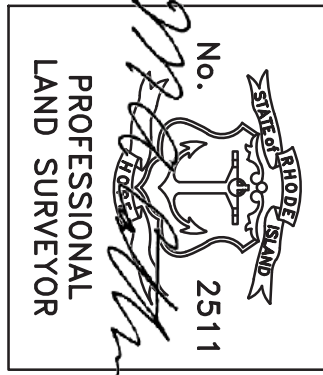
EXISTING CONDITIONS PLAN

DATA ACCUMULATION SURVEY

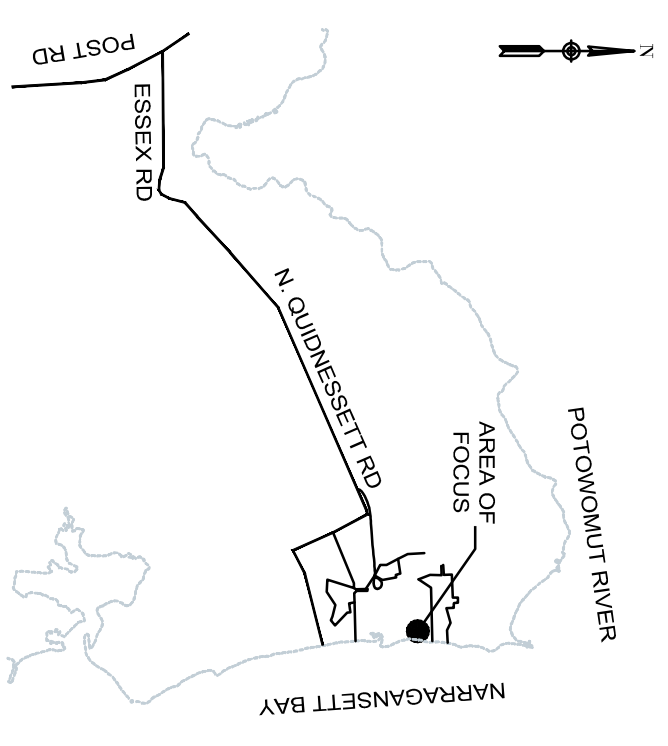
980 NORTH QUINNESSSETT ROAD
PLAT 167 LOT 2
NORTH KINGSTOWN, RHODE ISLAND

PREPARED FOR
QUINNESSSETT COUNTRY CLUB

MARK A. CASTELLANOS



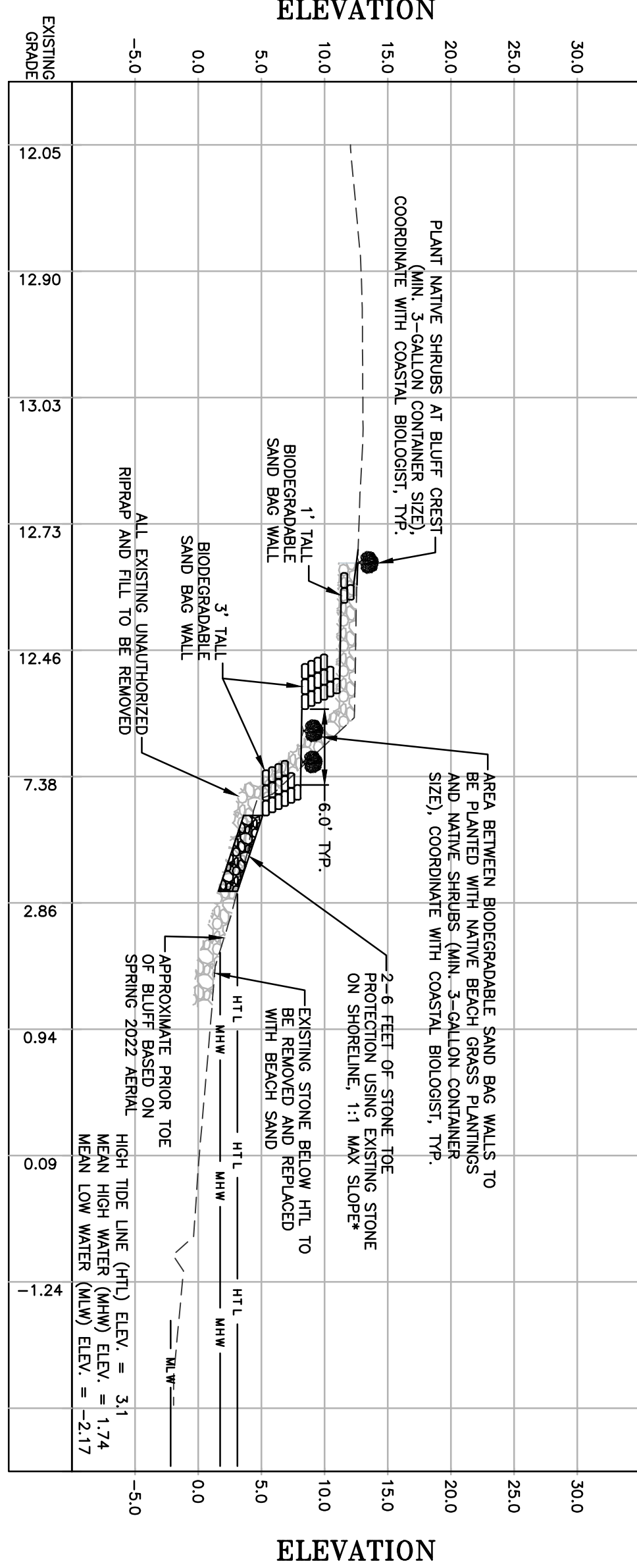
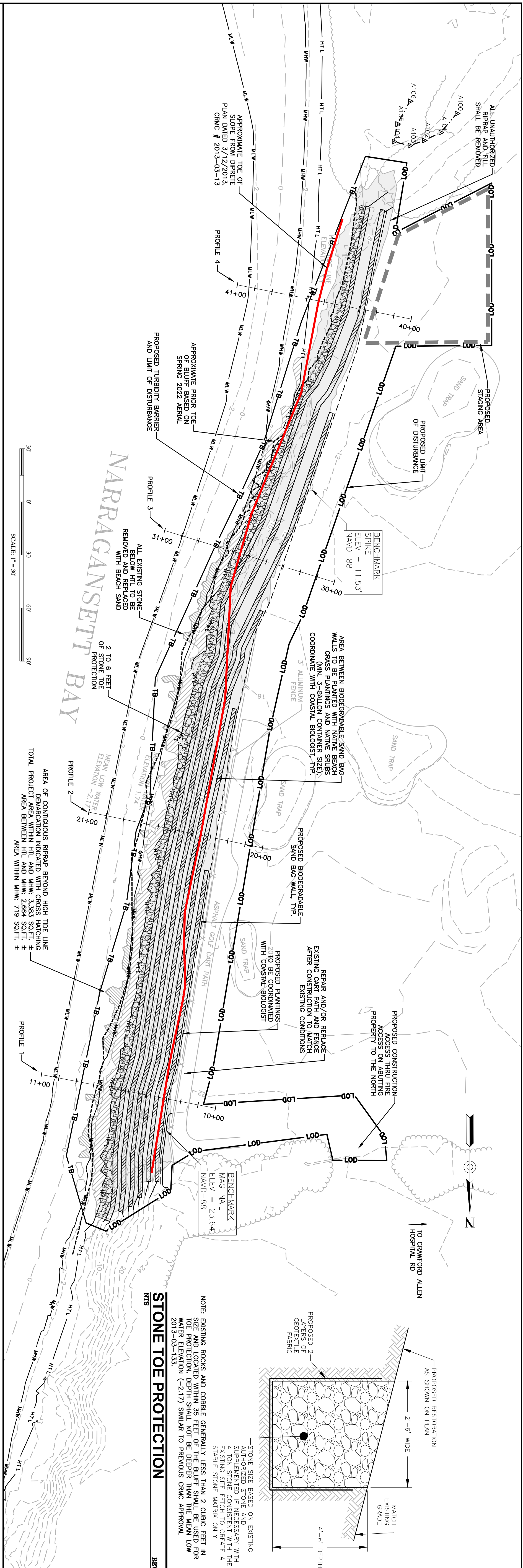
SV-1



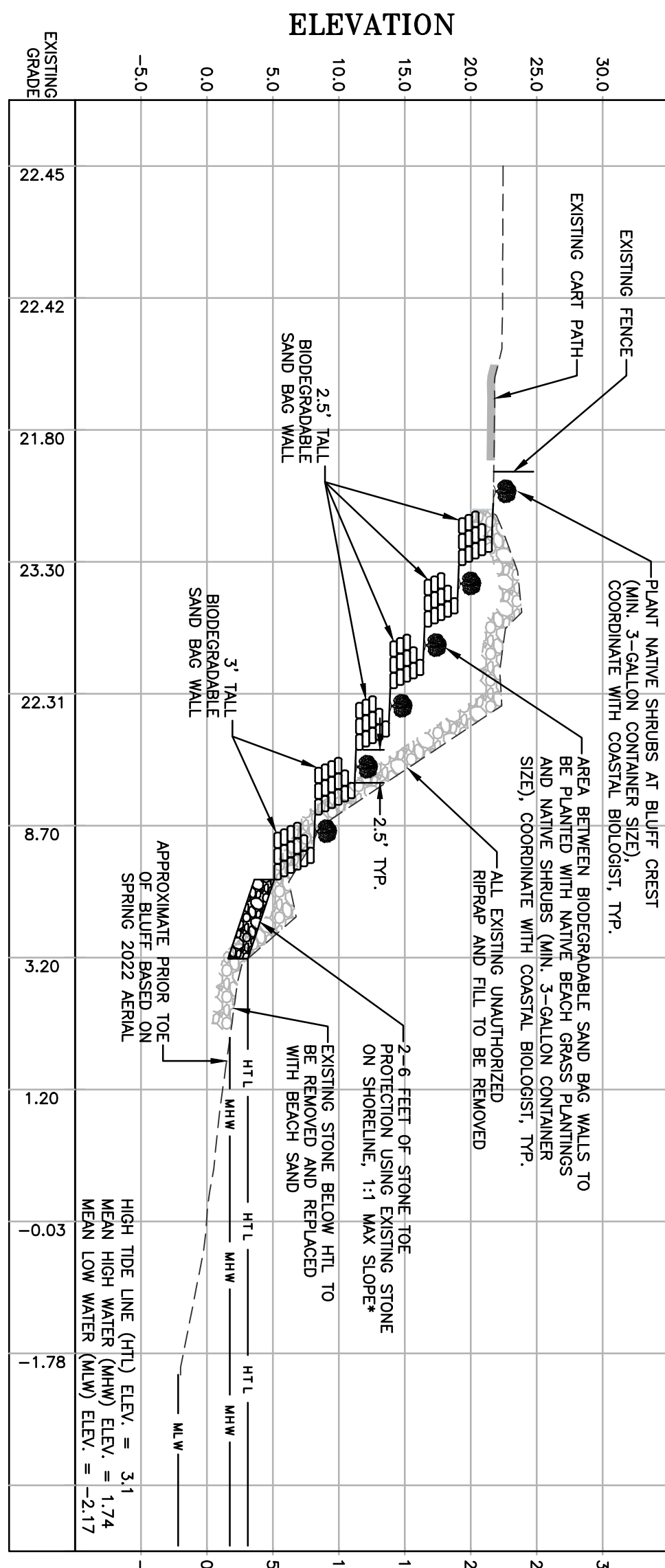
LOCATION MAP

NOTE: EXISTING ROCKS AND CORBLE GENERALLY LESS THAN 2 CUBIC FEET IN SIZE AND LOCATED WITHIN 35 FEET OF THE BLUFF SHALL BE USED FOR PROTECTION. DEPTH SHALL NOT BE DEEPER THAN THE MEAN LOW WATER ELEVATION (-2.17) SIMILAR TO PREVIOUS CRMC APPROVAL 2013-03-13.

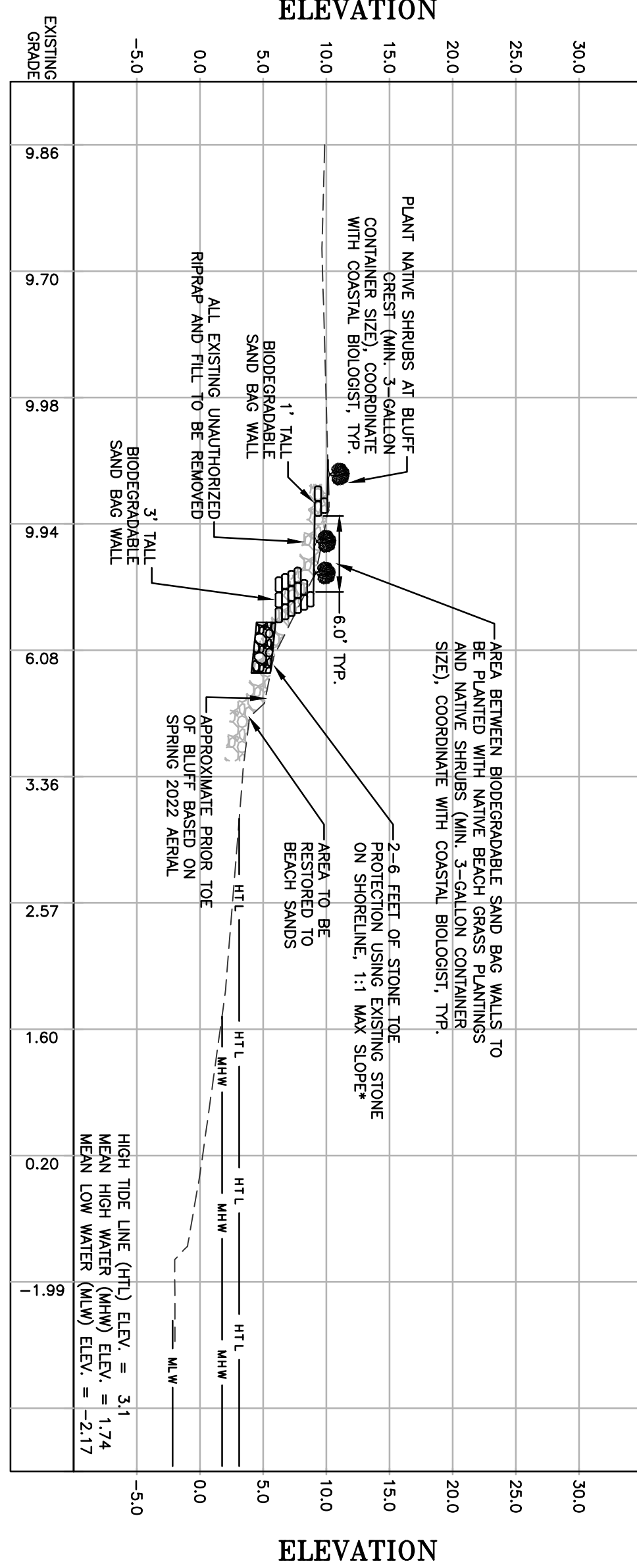
STONE TOE PROTECTION



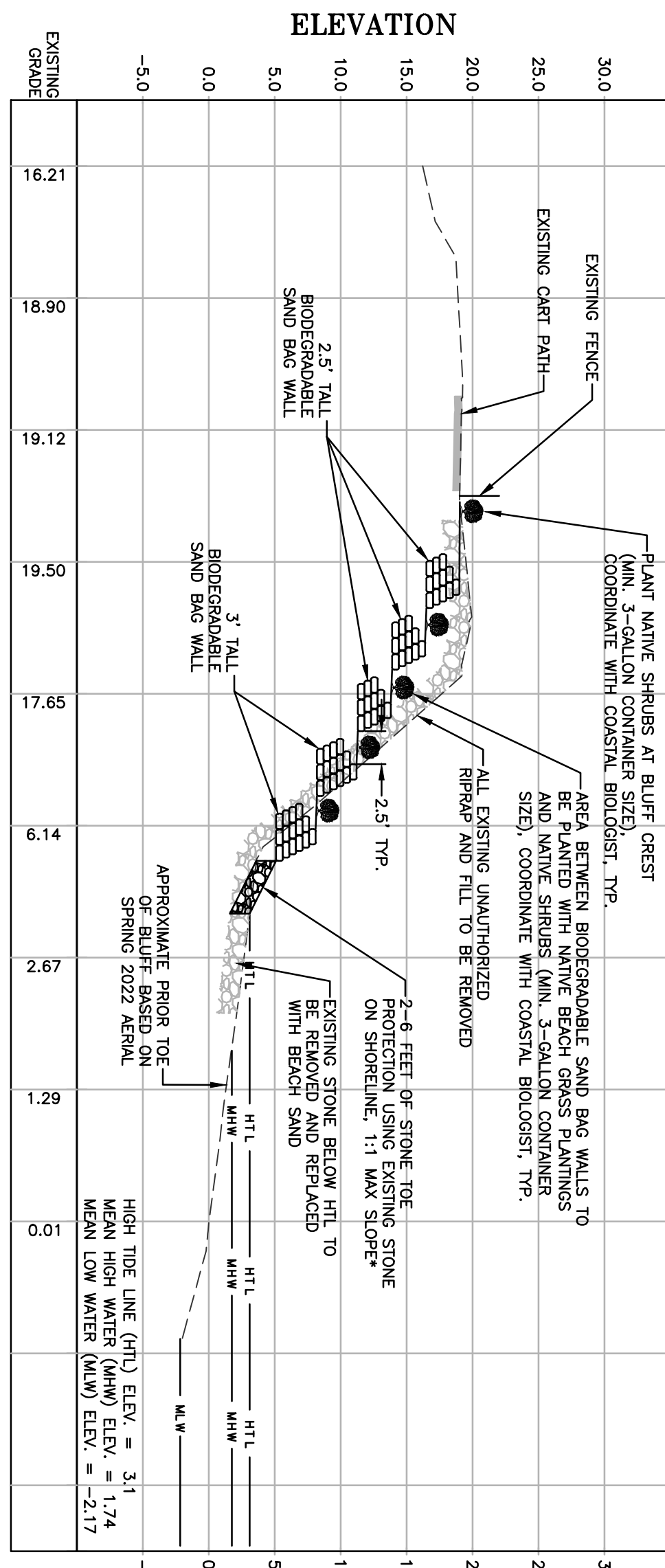
PROFILE 3
HORIZ. SCALE: 1" = 10'
VERT. SCALE = 1" = 10'



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



PROFILE 4
HORIZ. SCALE: 1" = 10'
VERT. SCALE = 1" = 10'



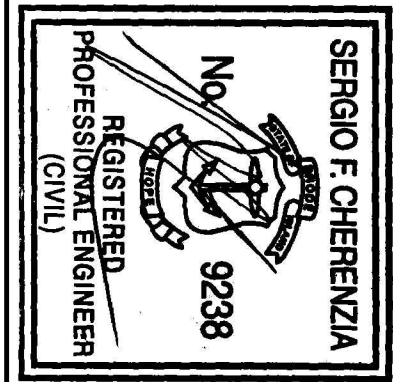
PROFILE 2
HORIZ. SCALE: 1" = 10'
VERT. SCALE = 1" = 10'

ISSUED FOR REVIEW

COASTAL RESTORATION PLAN

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

PREPARED FOR
QUIDNESSETT COUNTRY CLUB



C-1



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

(401) 783-3370
Fax (401) 783-3767

November 22, 2024

Via Email
Quidnessett Country Club, Inc.
PO Box 860
East Greenwich, RI 02818

RE: CRMC Cease & Desist Order 23-0185, dated August 28, 2023
Plat 167, Lot 2, 950 North Quidnessett Road, North Kingstown

Dear Attorney Cervenka,

As per my letters to you dated May 22, 2024, August 2, 2024, and October 11, 2024, Quidnessett Country Club, Inc. (QCC) is required to submit a proposed restoration plan prepared by a qualified professional that addresses the following:

- Removal of all unauthorized riprap and fill.
- Nonstructural stabilization of the coastal feature (reference Coastal Resources Management Program, section 1.3.1.(G)).
- Proposed native shrub and tree plantings, of appropriate size and density, throughout all areas of previously vegetated natural buffer zone.
- Restoration must also receive approval from the Army Corps of Engineers.

In your letter to me dated November 1, 2024, you state, "we request that the agency reconsider its position on the location of the stone north of the plan's "Profile 3" line and accept the location that we have proposed in the attached Cherenzia plan (revised October 30, 2024). Use of the 2013 toe of the berm line to the south of the Profile 3 line does work for the proposed terraced sandbag system." You also state in your letter, "We are proposing a different shoreline protection system that is built out further seaward in a more gradual, terraced configuration." For the same reason just used, staff is unable to support shoreline protection that extends further seaward than previously authorized as this constitutes a prohibited activity (CRMP § 1.3.1(G)(3)(c)) requiring a Special Exception (CRMP § 1.1.8). However, your proposed concept of shoreline protection constructed with a "more gradual terraced configuration", is a concept that staff can support, provided it is non-structural, does not propose the addition of stone from off site, and importantly is proposed to extend no further seaward than the "proposed toe berm" as approved by CRMC assent 2013-03-133 and shown on the plan titled "Quidnessett Country Club", prepared by Diprete Engineering, dated March 12, 2013.

The coastal restoration plan prepared by Cherenzia & Associates, LTD., revised October 30, 2024, submitted on November 1, 2024, is not acceptable for the following reasons:

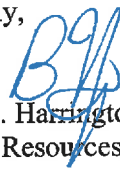
- As discussed above, shoreline protection that extends further seaward than previously authorized constitutes a prohibited activity (CRMP § 1.3.1(G)(3)(c)) requiring a Special Exception (CRMP § 1.1.8).
- The "Stone Toe Protection" plan detail proposes using geotextiles. Geotextiles cannot be used in nonstructural shoreline protection (CRMP § 1.1.2 (A.97)).

- The “Stone Toe Protection” plan detail proposes bringing in stones to supplement existing authorized stone. Bringing in stones from off site and using them in the restoration of the coastal feature is not allowed (CRMP § 1.3.1(G)(3)(c)).
- The “Stone Toe Protection” plan detail proposes burying stone toe protection and “only existing beach stone from the immediate vicinity (generally within 35 feet) of the eroded bluff may be used for bluff protection...”. As permitted by CRMC assent 2013-03-133 and shown on the plan titled "Quidnessett Country Club", prepared by Diprete Engineering, dated March 12, 2013, existing riprap may be restacked as a toe berm along the base of the proposed nonstructural shoreline protection.
- All proposed erosion and sedimentation controls must be shown on the plan and follow the Rhode Island Soil Erosion and Sediment Control Handbook.
- Proposed native plantings, including species, density, and location must be shown on the proposed plan. Recommended density, coverage, and minimum planting size can be found in the “Coastal Buffer Zone Planting Guide”, revised 2008. Appropriate native plants proposed must be listed in the “Rhode Island Native Plant Guide”, revised 2024.

The proposed plan states “Existing stone below HTL to be removed and replaced with beach sand”. This 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).

In order to avoid further enforcement action, a complete, acceptable restoration plan, must be submitted by December 6, 2024. Please feel free to contact me with any questions in the interim.

Sincerely,



Brian A. Harrington, Environmental Scientist III
Coastal Resources Management Council



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

December 6, 2024

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:

This letter is provided in response to your letter dated November 22, 2024, commenting on the proposed restoration plan by Cherenzia & Associates, LTD dated October 30, 2024. Your primary comment is that the proposed non-structural shoreline protection may not extend farther seaward than the "toe of berm" as depicted on a DiPrete plan previously approved by the agency in 2013. Not waiving our previously asserted objection to the depicted 2013 toe of berm and for the purpose of continuing to work with enforcement staff, QCC agrees to use the toe of the berm for its proposed restoration. However, due to technological advances that were not available in 2013, that toe can be more precisely located than the simple rendition of what is depicted on the 2013 plan. Specifically, historic LIDAR data enables us to pinpoint the exact area of the toe. Our engineering team is in the process of but has not yet completed its review of this data. Once it has established the line of the toe, our team will need to revise the restoration system to fit behind that line. We should be able to submit a revised restoration plan based upon the LIDAR data by December 20, 2024.

As indicated in previous correspondence to the agency, QCC reserves its rights to pursue its Water Type Change Petition, CRMC File No. 2024-04-071, (and, if approved, a

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

Category B shoreline protection application), and objects to restoration of the bluff pending the outcome on that Petition and related proceedings.¹

Sincerely,

A handwritten signature in dark ink, appearing to read 'JRC', written in a cursive style.

Jennifer R. Cervenka

cc: Janice Mathews, QCC
Robin L. Main, Hinkley Allen
Sergio Cherenzia, Cherenzia & Associates, Ltd.
Joseph Klinger, Ecotones, Inc.
Anthony DeSisto, CRMC Chief Legal Counsel
Jeffrey M. Willis, CRMC Executive Director

¹ At its September 24, 2024 meeting, the CRMC's Policy and Planning subcommittee voted to allow QCC to make a presentation with witnesses at an upcoming meeting. That meeting has been noticed for December 10, 2024.



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

December 20, 2024

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:

This letter is being provided in follow-up to our letter sent to you on December 6, 2024 and in further response to your letter dated November 22, 2024. We have been working on establishing the "toe of the berm" line as it would have existed around the time of the 2013 Emergency Assent permitting. Among the sources of information consulted, we reviewed the seaward toe of rock line in aerials from 2013-2015. The average or middle of the lines reviewed is depicted on the attached figure. This line is consistent with the 2013 agency-approved stone extending seaward from the base of the fortified bluff as depicted on those site plans.

In addition to the above, we are considering other technologies to make the shoreline protection system more resilient. Since 2021, the agency has approved certain elements in other shoreline facilities that may improve our system, including duckbill anchors and the stacking of rock at the base.¹ To that end, we have hired Rhode Island Professional Engineer Joshua Rosenberg to assist our team. Mr. Rosenberg has extensive

¹ QCC has reviewed CRMC assents for some shoreline protection facilities, including some that abut Type 1 waters, dated from January 2021 through September 2024.

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

experience working with the CRMC on coastal resiliency projects.

Finally, we would like to expedite the removal of rock from below the Mean High Water line and, possibly, areas below the High Tide Line in order to resolve federal jurisdictional issues, and to address the agency's cited violation for filling of tidal waters.

To review all of the above, develop an appropriately resilient shoreline protection plan, and expedite select areas for rock removal, we request and would benefit from a meeting with enforcement and engineering staff as soon as possible. Your time and input in such a meeting would be appreciated. Please get back to me with some suggested dates. I look forward to hearing from you.

As noted in prior correspondence, we continue to object to a non-structural restoration of QCC's northeastern shoreline and reserve all rights to pursue relief from the current prohibition against structural shoreline protection.

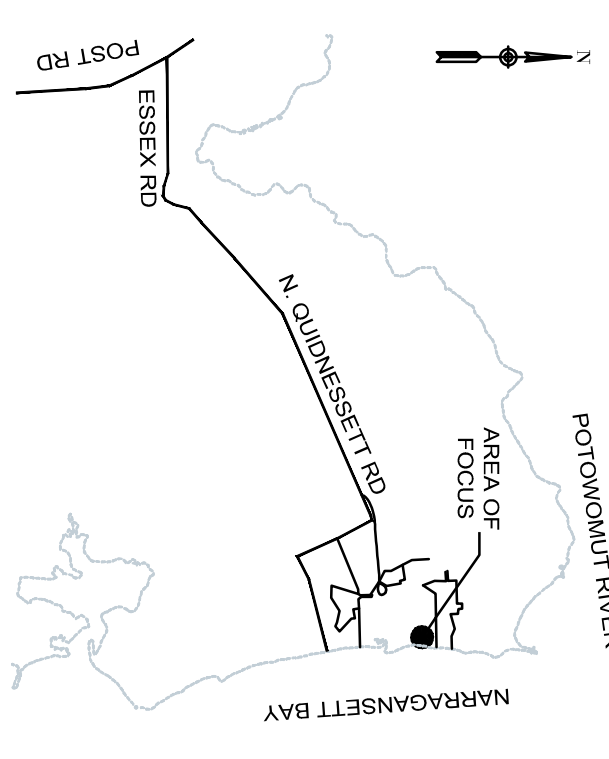
Sincerely,

A handwritten signature in dark ink, appearing to read 'JRC', is written over a light gray circular stamp.

Jennifer R. Cervenka

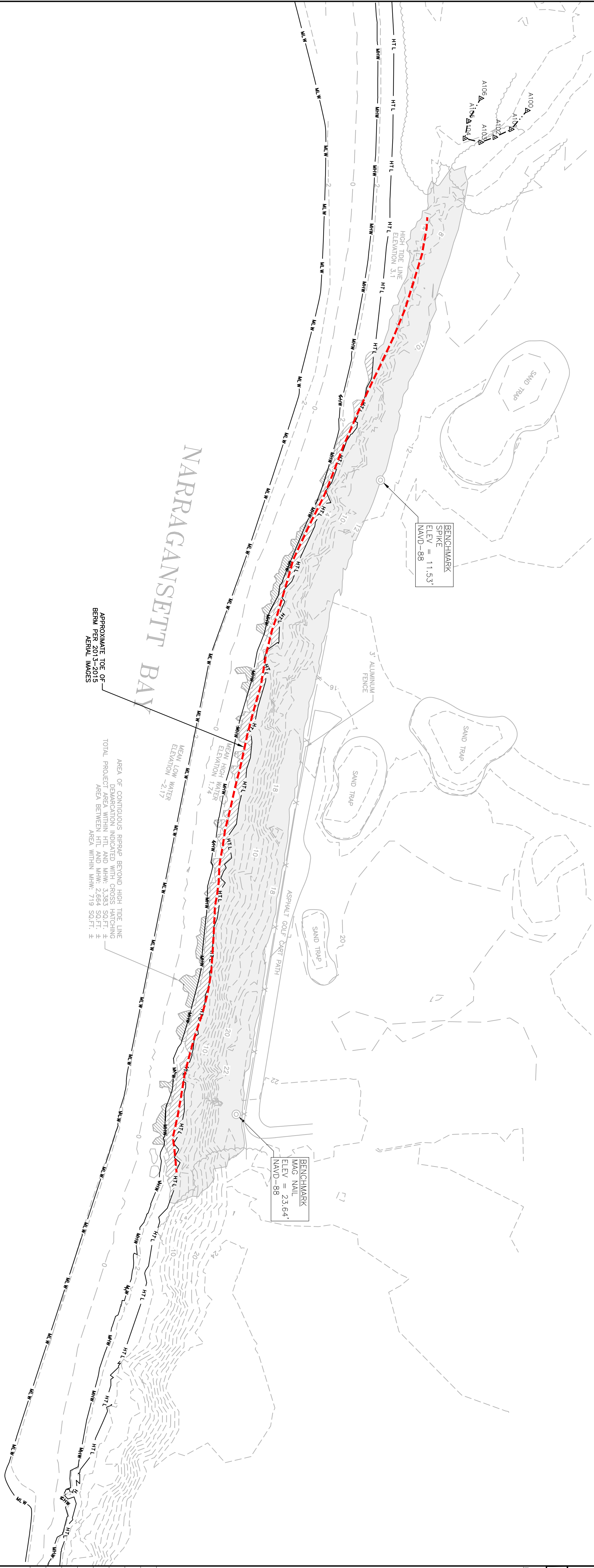
Attachment

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



LOCATION MAP

1. CONTOURS AND OTHER EXISTING SITE FEATURES FROM SURVEY PLAN PREPARED BY CHERENZIA & ASSOCIATES, LTD., TITLED EXISTING CONDITIONS PLAN, DATA ACCUMULATION SURVEY PREPARED FOR QUINDENSETT COUNTY CLUB DATED JUNE 7, 2024 REVISED JULY 23, 2024.

[illegible]

ISSUED FOR REVIEW

TOE OF BERM FIGURE

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

PREPARED FOR
QUIDNESSETT COUNTRY CLUB

FIG-1

RE: USACE Project Inbox Info

From bharrington@crmc.ri.gov <bharrington@crmc.ri.gov>

Date Wed 1/29/2025 3:01 PM

To Jennifer Cervenka <jcervenka@cgdesq.com>

Cc Jeff Willis <jwillis@crmc.ri.gov>; Laura Miguel <lmiguel@crmc.ri.gov>; Rich Lucia <rlucia@crmc.ri.gov>; Janice Mathews <janicem@jancompanies.com>; Main, Robin L. <rmain@hinckleyallen.com>; sergio@cherenzia.com <sergio@cherenzia.com>; Emily Hall <ehall@crmc.ri.gov>

Hi Jenn,

The agency reached out to Janet Freedman/Dave Reis regarding CRMC assent 2013-03-133. While they each remembered visiting the site, neither of them remembers specific details of their separate site visits. We also looked through the paper files left behind by staff when they retired, and did not find anything related to Quidnessett Country Club.

A deadline of Monday, February 3, 2025, to submit an updated restoration plan is acceptable to us.

Thank you,
Brian

Brian A. Harrington, Environmental Scientist III
Coastal Resources Management Council
4808 Tower Hill Road
Wakefield, RI 02879

Office 401-783-3370
Email bharrington@crmc.ri.gov

From: Jennifer Cervenka <jcervenka@cgdesq.com>

Sent: Monday, January 27, 2025 5:07 PM

To: ehall@crmc.ri.gov

Cc: bharrington@crmc.ri.gov; 'Laura Miguel' <lmiguel@crmc.ri.gov>; Rich Lucia <rlucia@crmc.ri.gov>; Janice Mathews <janicem@jancompanies.com>; Main, Robin L. <rmain@hinckleyallen.com>; sergio@cherenzia.com

Subject: RE: USACE Project Inbox Info

Good afternoon Emily/all,

Thank you for the information below and for discussion on the plan approved by the 2013 Emergency Assent and the marked-up aerals, reviewed together during our meeting last Friday.

I've conferred with our team, and subject to you finding out additional information from Janet Freedman/Dave Reis or from the paper files on the as-built shoreline protection, we anticipate needing about one week to get together the visuals you requested.

Best,
Jenn

Jennifer Cervenka | Member



cervenka green & ducharme llc

225 Dyer Street, 2nd Floor

Providence, RI 02903

(401) 214-1022 (office)

(401) 480-8768 (mobile)

jcervenka@cgdesq.com

From: ehall@crmc.ri.gov <ehall@crmc.ri.gov>

Sent: Friday, January 24, 2025 11:07 AM

To: Jennifer Cervenka <jcervenka@cgdesq.com>

Cc: bharrington@crmc.ri.gov; 'Laura Miguel' <lmiguel@crmc.ri.gov>; Rich Lucia <rlucia@crmc.ri.gov>

Subject: USACE Project Inbox Info

Hi Jenn,

Glad we could discuss QCC this morning. For any work below the high tide line (HTL), including the removal of fill material, you'll need some form of USACE authorization. Once you have plans that show the HTL, you can calculate square footage of impacts below HTL. A Plan Set and impact calculation can be submitted to the RI USACE Project Inbox (cenae-r-ri@usace.army.mil). Once it is assigned a project number, Elizabeth Waterhouse will evaluate the plans work with you to determine what type of USACE authorization is needed.

Thanks,
Emily

Emily Hall (she/her)

Coastal Geologist II

Coastal Resources Management Council

4808 Tower Hill Road

Wakefield, RI 02879

Main Office: (401)783-3370

RE: USACE Project Inbox Info

From Jennifer Cervenka <jcervenka@cgdesq.com>

Date Mon 2/3/2025 6:54 PM

To Brian Harrington <bharrington@crmc.ri.gov>

Cc Jeff Willis <jwillis@crmc.ri.gov>; Laura Miguel <lmiguel@crmc.ri.gov>; Rich Lucia <rlucia@crmc.ri.gov>; 'Janice Mathews' <janicem@jancompanies.com>; 'Main, Robin L.' <rmain@hinckleyallen.com>; sergio@cherenzia.com <sergio@cherenzia.com>; Emily Hall <ehall@crmc.ri.gov>

 1 attachment (2 MB)

2025-02-03 CRMC Figure 1A - 2011 LIDAR.pdf;

Good evening Brian/all:

I'm attaching a 2011 LIDAR aerial, one of the two additional visuals Emily requested in order to evaluate how far seaward the restoration features can be located. We are still working on the second visual – a conceptual build out of the cross-section depicted in the DiPrete approved plan – and should have that to you in the next few days.

We have also requested and are awaiting files, if any, from Scott Rabideau, who served as the environmental monitor for the 2013 permit. Although not found during the agency's recent search, per the notes on the approved plan, CRMC files should include the monitor's weekly progress reports and a final written compliance report with photographs of the completed shoreline protection.

Thank you,
Jenn

Jennifer Cervenka | Member



cervenka green & ducharme llc

225 Dyer Street, 2nd Floor

Providence, RI 02903

(401) 214-1022 (office)

(401) 480-8768 (mobile)

jcervenka@cgdesq.com

From: bharrington@crmc.ri.gov <bharrington@crmc.ri.gov>

Sent: Wednesday, January 29, 2025 3:01 PM

To: Jennifer Cervenka <jcervenka@cgdesq.com>

Cc: 'Jeff Willis' <jwillis@crmc.ri.gov>; 'Laura Miguel' <lmiguel@crmc.ri.gov>; 'Rich Lucia' <rlucia@crmc.ri.gov>; 'Janice Mathews' <janicem@jancompanies.com>; 'Main, Robin L.' <rmain@hinckleyallen.com>;

sergio@cherenzia.com; ehall@crmc.ri.gov

Subject: RE: USACE Project Inbox Info

Hi Jenn,

The agency reached out to Janet Freedman/Dave Reis regarding CRMC assent 2013-03-133. While they each remembered visiting the site, neither of them remembers specific details of their separate site visits. We also looked through the paper files left behind by staff when they retired, and did not find anything related to Quidnessett Country Club.

A deadline of Monday, February 3, 2025, to submit an updated restoration plan is acceptable to us.

Thank you,
Brian

Brian A. Harrington, Environmental Scientist III
Coastal Resources Management Council
4808 Tower Hill Road
Wakefield, RI 02879

Office 401-783-3370

Email bharrington@crmc.ri.gov

From: Jennifer Cervenka <jcervenka@cgdesq.com>

Sent: Monday, January 27, 2025 5:07 PM

To: ehall@crmc.ri.gov

Cc: bharrington@crmc.ri.gov; 'Laura Miguel' <lmiguel@crmc.ri.gov>; Rich Lucia <rlucia@crmc.ri.gov>; Janice Mathews <janicem@jancompanies.com>; Main, Robin L. <rmain@hinckleyallen.com>; sergio@cherenzia.com

Subject: RE: USACE Project Inbox Info

Good afternoon Emily/all,

Thank you for the information below and for discussion on the plan approved by the 2013 Emergency Assent and the marked-up aerials, reviewed together during our meeting last Friday.

I've conferred with our team, and subject to you finding out additional information from Janet Freedman/Dave Reis or from the paper files on the as-built shoreline protection, we anticipate needing about one week to get together the visuals you requested.

Best,
Jenn

Jennifer Cervenka | Member



cervenka green & ducharme llc

225 Dyer Street, 2nd Floor
Providence, RI 02903
(401) 214-1022 (office)
(401) 480-8768 (mobile)
jcervenka@cgdesq.com

From: ehall@crmc.ri.gov <ehall@crmc.ri.gov>

Sent: Friday, January 24, 2025 11:07 AM

To: Jennifer Cervenka <jcervenka@cgdesq.com>

Cc: bharrington@crmc.ri.gov; 'Laura Miguel' <lmiguel@crmc.ri.gov>; Rich Lucia <rlucia@crmc.ri.gov>

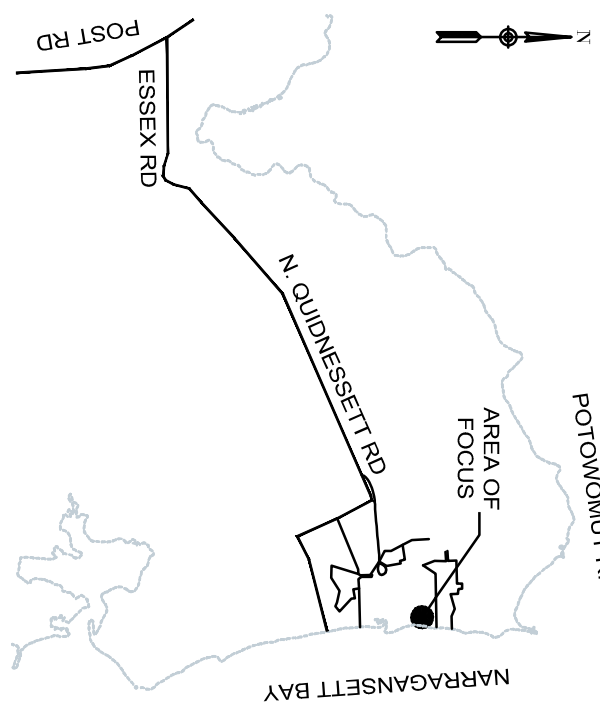
Subject: USACE Project Inbox Info

Hi Jenn,

Glad we could discuss QCC this morning. For any work below the high tide line (HTL), including the removal of fill material, you'll need some form of USACE authorization. Once you have plans that show the HTL, you can calculate square footage of impacts below HTL. A Plan Set and impact calculation can be submitted to the RI USACE Project Inbox (cenae-r-ri@usace.army.mil). Once it is assigned a project number, Elizabeth Waterhouse will evaluate the plans work with you to determine what type of USACE authorization is needed.

Thanks,
Emily

Emily Hall (she/her)
Coastal Geologist II
Coastal Resources Management Council
4808 Tower Hill Road
Wakefield, RI 02879
Main Office: (401)783-3370



PLAN REVISIONS				
REV. NO.	DATE	DESCRIPTION	BY	CHK
1	2.3/25	2011 LIDAR	AKG	SEC

SCALE: 1"=20'	DRAWN BY: AKG
CAJOB # 224031	CHECK BY: SFC
DATE: JAN. 21, 2025	

ISSUED FOR REVIEW
2011 AERIAL OVERLAY
QUINNESSETT COUNTRY CLUB 950 NORTH QUINNESSETT ROAD PLAT 167 LOT 2 NORTH KINGSTOWN, RHODE ISLAND
PREPARED FOR QUINNESSETT COUNTRY CLUB

FIG-1A

RE: USACE Project Inbox Info

From Jennifer Cervenka <jcervenka@cgdesq.com>

Date Fri 2/7/2025 11:11 AM

To Brian Harrington <bharrington@crmc.ri.gov>

Cc Jeff Willis <jwillis@crmc.ri.gov>; Laura Miguel <lmiguel@crmc.ri.gov>; Rich Lucia <rlucia@crmc.ri.gov>; 'Janice Mathews' <janicem@jancompanies.com>; 'Main, Robin L.' <rmain@hinckleyallen.com>; sergio@cherenzia.com <sergio@cherenzia.com>; Emily Hall <ehall@crmc.ri.gov>

 1 attachment (5 MB)

2025-02-03 CRMC Figure 1 - 2013 Approximate Design.pdf;

Good morning Brian/Emily/all:

Per your request, attached is a conceptual build out of the shoreline protection design specified in the cross-section of the 2013 DiPrete approved plan, with the coir envelopes ("burritos") built out from the face of the bluff and the stone toe protection starting at the edge of the bottom row of burritos. As you can see, the blue cross-hatched restoration area and stone toe protection is not contained within, but rather extends seaward beyond, the double red lines depicted in DiPrete's site plan. Further, both the cross-section conceptual build out and DiPrete's double red lines are different from what was actually constructed and maintained for a decade, as demonstrated by the multiple aerials provided during our meeting on January 24, 2025. These inconsistencies suggest that the 2013 assent was based upon a rough conceptual plan generated during an emergency and that the design was implemented more expansively when installed. The agency was well aware of what was installed as it required an environmental monitor to submit weekly progress reports and a final compliance report with photographs to the agency. Accordingly, we believe the magenta line on the attached – which shows the furthest seaward extent of the 2013 installed shoreline protection system – is the most appropriate baseline to use in any restoration plan.

Thank you,
Jenn

Jennifer Cervenka | Member



cervenka green & ducharme llc

225 Dyer Street, 2nd Floor
Providence, RI 02903
(401) 214-1022 (office)
(401) 480-8768 (mobile)
jcervenka@cgdesq.com

From: Jennifer Cervenka

Sent: Monday, February 3, 2025 6:55 PM

To: bharrington@crmc.ri.gov

Cc: 'Jeff Willis' <jwillis@crmc.ri.gov>; 'Laura Miguel' <lmiguel@crmc.ri.gov>; 'Rich Lucia' <rlucia@crmc.ri.gov>; 'Janice Mathews' <janicem@jancompanies.com>; 'Main, Robin L.' <rmain@hinckleyallen.com>; sergio@cherenzia.com; ehall@crmc.ri.gov

Subject: RE: USACE Project Inbox Info

Good evening Brian/all:

I'm attaching a 2011 LIDAR aerial, one of the two additional visuals Emily requested in order to evaluate how far seaward the restoration features can be located. We are still working on the second visual – a conceptual build out of the cross-section depicted in the DiPrete approved plan – and should have that to you in the next few days.

We have also requested and are awaiting files, if any, from Scott Rabideau, who served as the environmental monitor for the 2013 permit. Although not found during the agency's recent search, per the notes on the approved plan, CRMC files should include the monitor's weekly progress reports and a final written compliance report with photographs of the completed shoreline protection.

Thank you,
Jenn

Jennifer Cervenka | Member



cervenka green & ducharme llc

225 Dyer Street, 2nd Floor

Providence, RI 02903

(401) 214-1022 (office)

(401) 480-8768 (mobile)

jcervenka@cghdesq.com

From: bharrington@crmc.ri.gov <bharrington@crmc.ri.gov>

Sent: Wednesday, January 29, 2025 3:01 PM

To: Jennifer Cervenka <jcervenka@cghdesq.com>

Cc: 'Jeff Willis' <jwillis@crmc.ri.gov>; 'Laura Miguel' <lmiguel@crmc.ri.gov>; 'Rich Lucia' <rlucia@crmc.ri.gov>; 'Janice Mathews' <janicem@jancompanies.com>; 'Main, Robin L.' <rmain@hinckleyallen.com>; sergio@cherenzia.com; ehall@crmc.ri.gov

Subject: RE: USACE Project Inbox Info

Hi Jenn,

The agency reached out to Janet Freedman/Dave Reis regarding CRMC assent 2013-03-133. While they each remembered visiting the site, neither of them remembers specific details of their separate site visits. We also looked through the paper files left behind by staff when they retired, and did not find anything related to Quidnessett Country Club.

A deadline of Monday, February 3, 2025, to submit an updated restoration plan is acceptable to us.

Thank you,

Brian

Brian A. Harrington, Environmental Scientist III
Coastal Resources Management Council
4808 Tower Hill Road
Wakefield, RI 02879

Office 401-783-3370

Email bharrington@crmc.ri.gov

From: Jennifer Cervenka <jcervenka@cgdesq.com>

Sent: Monday, January 27, 2025 5:07 PM

To: ehall@crmc.ri.gov

Cc: bharrington@crmc.ri.gov; 'Laura Miguel' <lmiguel@crmc.ri.gov>; Rich Lucia <rlucia@crmc.ri.gov>; Janice Mathews <janicem@jancompanies.com>; Main, Robin L. <rmain@hinckleyallen.com>; sergio@cherenzia.com

Subject: RE: USACE Project Inbox Info

Good afternoon Emily/all,

Thank you for the information below and for discussion on the plan approved by the 2013 Emergency Assent and the marked-up aerals, reviewed together during our meeting last Friday.

I've conferred with our team, and subject to you finding out additional information from Janet Freedman/Dave Reis or from the paper files on the as-built shoreline protection, we anticipate needing about one week to get together the visuals you requested.

Best,
Jenn

Jennifer Cervenka | Member



cervenka green & ducharme llc

225 Dyer Street, 2nd Floor
Providence, RI 02903
(401) 214-1022 (office)
(401) 480-8768 (mobile)
jcervenka@cgdesq.com

From: ehall@crmc.ri.gov <ehall@crmc.ri.gov>

Sent: Friday, January 24, 2025 11:07 AM

To: Jennifer Cervenka <jcervenka@cgdesq.com>

Cc: bharrington@crmc.ri.gov; 'Laura Miguel' <lmiguel@crmc.ri.gov>; Rich Lucia <rlucia@crmc.ri.gov>

Subject: USACE Project Inbox Info

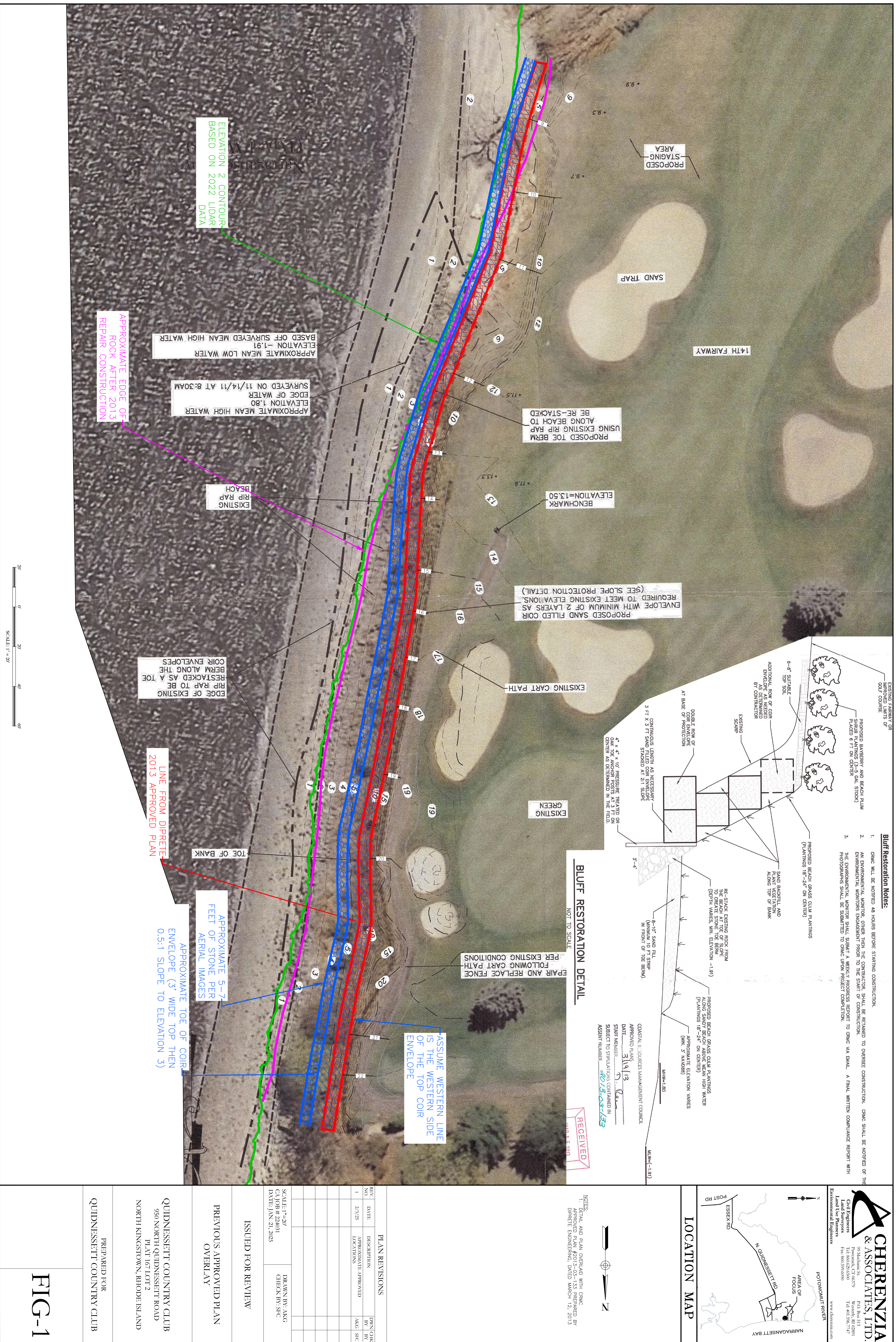
Hi Jenn,

Glad we could discuss QCC this morning. For any work below the high tide line (HTL), including the removal of fill material, you'll need some form of USACE authorization. Once you have plans that show

the HTL, you can calculate square footage of impacts below HTL. A Plan Set and impact calculation can be submitted to the RI USACE Project Inbox (cenae-r-ri@usace.army.mil). Once it is assigned a project number, Elizabeth Waterhouse will evaluate the plans work with you to determine what type of USACE authorization is needed.

Thanks,
Emily

Emily Hall (she/her)
Coastal Geologist II
Coastal Resources Management Council
4808 Tower Hill Road
Wakefield, RI 02879
Main Office: (401)783-3370



RE: USACE Project Inbox Info

From Jennifer Cervenka <jcervenka@cgdesq.com>

Date Fri 2/14/2025 9:17 AM

To Brian Harrington <bharrington@crmc.ri.gov>

Cc Jeff Willis <jwillis@crmc.ri.gov>; Laura Miguel <lmiguel@crmc.ri.gov>; Rich Lucia <rlucia@crmc.ri.gov>; 'Janice Mathews' <janicem@jancompanies.com>; 'Main, Robin L.' <rmain@hinckleyallen.com>; sergio@cherenzia.com <sergio@cherenzia.com>; Emily Hall <ehall@crmc.ri.gov>

 2 attachments (6 MB)

12-091 post construction plan_rev.pdf; 2025-02-13 CRMC Fig-1 Approved overlaid with NRS.pdf;

Good morning Brian/Emily/all:

Scott Rabideau (Natural Resource Services, Inc.) had in his files the attached as-built graphic, including GPS-located toe stakes of the installed coir envelopes (burritos). Cherenzia inserted the GPS coordinates and overlaid the NRS graphic onto the 2013 approved plan and the 2013-2014 aerials, with the 2022 LIDAR. The green-hatched permitted buffer zone matches up with the DiPrete double red lines. The blue-hatched bluff restoration area (burritos) and peach-hatched stone toe protection, essentially line up with where they are shown to have been installed on the aerials, i.e. out to the magenta line (the as-built condition).

Thank you
Jenn

Jennifer Cervenka | Member



cervenka green & ducharme llc

225 Dyer Street, 2nd Floor

Providence, RI 02903

(401) 214-1022 (office)

(401) 480-8768 (mobile)

jcervenka@cgdesq.com

From: Jennifer Cervenka

Sent: Friday, February 7, 2025 11:11 AM

To: bharrington@crmc.ri.gov

Cc: 'Jeff Willis' <jwillis@crmc.ri.gov>; 'Laura Miguel' <lmiguel@crmc.ri.gov>; 'Rich Lucia' <rlucia@crmc.ri.gov>; 'Janice Mathews' <janicem@jancompanies.com>; 'Main, Robin L.' <rmain@hinckleyallen.com>; sergio@cherenzia.com; ehall@crmc.ri.gov

Subject: RE: USACE Project Inbox Info

Good morning Brian/Emily/all:

Per your request, attached is a conceptual build out of the shoreline protection design specified in the cross-section of the 2013 DiPrete approved plan, with the coir envelopes ("burritos") built out from the face of the bluff and the stone toe protection starting at the edge of the bottom row of burritos. As you can see, the blue cross-hatched restoration area and stone toe protection is not contained within, but rather extends seaward beyond, the double red lines depicted in DiPrete's site plan. Further, both the cross-section conceptual build out and DiPrete's double red lines are different from what was actually constructed and maintained for a decade, as demonstrated by the multiple aerals provided during our meeting on January 24, 2025. These inconsistencies suggest that the 2013 assent was based upon a rough conceptual plan generated during an emergency and that the design was implemented more expansively when installed. The agency was well aware of what was installed as it required an environmental monitor to submit weekly progress reports and a final compliance report with photographs to the agency. Accordingly, we believe the magenta line on the attached – which shows the furthest seaward extent of the 2013 installed shoreline protection system – is the most appropriate baseline to use in any restoration plan.

Thank you,
Jenn

Jennifer Cervenka | Member



cervenka green & ducharme llc

225 Dyer Street, 2nd Floor
Providence, RI 02903
(401) 214-1022 (office)
(401) 480-8768 (mobile)
jcervenka@cgdesq.com

From: Jennifer Cervenka

Sent: Monday, February 3, 2025 6:55 PM

To: bharrington@crmc.ri.gov

Cc: 'Jeff Willis' <jwillis@crmc.ri.gov>; 'Laura Miguel' <lmiguel@crmc.ri.gov>; 'Rich Lucia' <rlucia@crmc.ri.gov>; 'Janice Mathews' <janicem@jancompanies.com>; 'Main, Robin L.' <rmain@hinckleyallen.com>; sergio@cherenzia.com; ehall@crmc.ri.gov

Subject: RE: USACE Project Inbox Info

Good evening Brian/all:

I'm attaching a 2011 LIDAR aerial, one of the two additional visuals Emily requested in order to evaluate how far seaward the restoration features can be located. We are still working on the second visual – a conceptual build out of the cross-section depicted in the DiPrete approved plan – and should have that to you in the next few days.

We have also requested and are awaiting files, if any, from Scott Rabideau, who served as the environmental monitor for the 2013 permit. Although not found during the agency's recent search, per the notes on the approved plan, CRMC files should include the monitor's weekly progress reports and a final written compliance report with photographs of the completed shoreline protection.

Thank you,
Jenn

Jennifer Cervenka | Member



cervenka green & ducharme llc

225 Dyer Street, 2nd Floor
Providence, RI 02903
(401) 214-1022 (office)
(401) 480-8768 (mobile)
jcervenka@cgdesq.com

From: bharrington@crmc.ri.gov <bharrington@crmc.ri.gov>

Sent: Wednesday, January 29, 2025 3:01 PM

To: Jennifer Cervenka <jcervenka@cgdesq.com>

Cc: 'Jeff Willis' <jwillis@crmc.ri.gov>; 'Laura Miguel' <lmiguel@crmc.ri.gov>; 'Rich Lucia' <rlucia@crmc.ri.gov>; 'Janice Mathews' <janicem@jancompanies.com>; 'Main, Robin L.' <rmain@hinckleyallen.com>; sergio@cherenzia.com; ehall@crmc.ri.gov

Subject: RE: USACE Project Inbox Info

Hi Jenn,

The agency reached out to Janet Freedman/Dave Reis regarding CRMC assent 2013-03-133. While they each remembered visiting the site, neither of them remembers specific details of their separate site visits. We also looked through the paper files left behind by staff when they retired, and did not find anything related to Quidnessett Country Club.

A deadline of Monday, February 3, 2025, to submit an updated restoration plan is acceptable to us.

Thank you,
Brian

Brian A. Harrington, Environmental Scientist III
Coastal Resources Management Council
4808 Tower Hill Road
Wakefield, RI 02879

Office 401-783-3370
Email bharrington@crmc.ri.gov

From: Jennifer Cervenka <jcervenka@cgdesq.com>

Sent: Monday, January 27, 2025 5:07 PM

To: ehall@crmc.ri.gov

Cc: bharrington@crmc.ri.gov; 'Laura Miguel' <lmiguel@crmc.ri.gov>; Rich Lucia <rlucia@crmc.ri.gov>; Janice Mathews <janicem@jancompanies.com>; Main, Robin L. <rmain@hinckleyallen.com>; sergio@cherenzia.com

Subject: RE: USACE Project Inbox Info

Good afternoon Emily/all,

Thank you for the information below and for discussion on the plan approved by the 2013 Emergency Assent and the marked-up aerals, reviewed together during our meeting last Friday.

I've conferred with our team, and subject to you finding out additional information from Janet Freedman/Dave Reis or from the paper files on the as-built shoreline protection, we anticipate needing about one week to get together the visuals you requested.

Best,
Jenn

Jennifer Cervenka | Member



cervenka green & ducharme llc

225 Dyer Street, 2nd Floor
Providence, RI 02903
(401) 214-1022 (office)
(401) 480-8768 (mobile)
jcervenka@cghdesq.com

From: ehall@crmc.ri.gov <ehall@crmc.ri.gov>

Sent: Friday, January 24, 2025 11:07 AM

To: Jennifer Cervenka <jcervenka@cghdesq.com>

Cc: bharrington@crmc.ri.gov; 'Laura Miguel' <lmiguel@crmc.ri.gov>; Rich Lucia <rlucia@crmc.ri.gov>

Subject: USACE Project Inbox Info

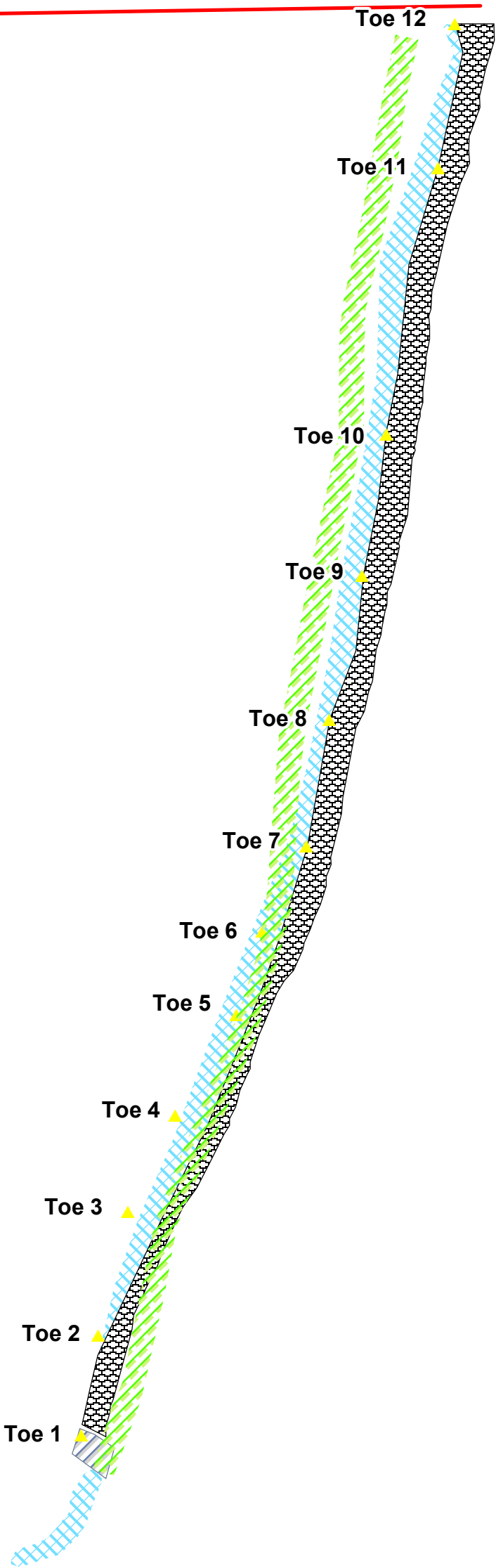
Hi Jenn,

Glad we could discuss QCC this morning. For any work below the high tide line (HTL), including the removal of fill material, you'll need some form of USACE authorization. Once you have plans that show the HTL, you can calculate square footage of impacts below HTL. A Plan Set and impact calculation can be submitted to the RI USACE Project Inbox (cenae-r-ri@usace.army.mil). Once it is assigned a project number, Elizabeth Waterhouse will evaluate the plans work with you to determine what type of USACE authorization is needed.

Thanks,
Emily

Emily Hall (she/her)
Coastal Geologist II
Coastal Resources Management Council
4808 Tower Hill Road
Wakefield, RI 02879
Main Office: (401)783-3370

- Legend
- Bluff Restoration
- Toe Protection
- Ramp
- Permitted Buffer Zone
- Toe Stakes
- Property Line



2011 Historic Aerial
Quidnessett Country Club
A.P. 167, Lot 2
North Kingstown, RI

0 25 50 100 Feet
Permitted Buffer Zone taken from Site Plan titled "Quidnessett Country Club" Sheet 1 of 2
Date 6/12/13
Prepared by DiPrete Engineering



2011 RIGIS Ortho Image
Natural Resource Services, Inc.
P.O. Box 311
180 Tinkham Lane
Harrisville, RI 02830
P: (401) 568-7390
F: (401) 568-7490
(c) 1990 RIGIS

LEGEND

NRS BLUFF RESTORATION

NRS TOE PROTECTION

NRS PERMITTED BUFFER ZONE

NRS GPS TOE STAKES

APPROVED COIR ENVELOPE LOCATION PER 2013 DIPRETE APPROVED PLAN

SEAWARD EDGE OF STONE TOE PROTECTION PER AERIAL IMAGERY

ELEVATION 2 CONTOUR BASED ON 2022 LIDAR DATA

PROPOSED STAGING AREA

SAND TRAP

14TH FAIRWAY

BENCHMARK
ELEVATION=13.50

PROPOSED TOE BERM
USING EXISTING RIP RAP
BE RE-STACKED

PROPOSED SAND FILLED COIR
ENVELOPE WITH MINIMUM OF 2 LAYERS AS
REQUIRED TO MEET EXISTING ELEVATIONS.
(SEE SLOPE PROTECTION DETAIL)

EXISTING CART PATH

BLUFF RESTORATION
PER NRS PLAN

PERMITTED BUFFER
ZONE PER NRS PLAN

TOE PROTECTION
PER NRS PLAN

TOE OF BANK

EXISTING RIP RAP
BEACH

APPROXIMATE MEAN HIGH WATER
ELEVATION 1.80
SURVEYED ON 11/14/11 AT 8:30AM

APPROXIMATE MEAN LOW WATER
ELEVATION -1.91
BASED OFF SURVEYED MEAN HIGH WATER

APPROXIMATE EDGE OF
ROCK AFTER 2013
REPAIR CONSTRUCTION

ELEVATION 2 CONTOUR
BASED ON 2022 LIDAR
DATA

EXISTING FARMWAY OR
ROAD COURSE

PROPOSED BARRIERS AND BEACH PLUM
(PLANTING 10'-24" ON CENTER)

PROPOSED BEACH GRASS CLUMP PLANTINGS
(PLANTING 10'-24" ON CENTER)

6-8" SUITABLE
TOP SOIL

ADDITIONAL ROW OF COIR
ENVELOPE IS REQUIRED
BY CONTRACTOR

EXISTING
SCOPE

DOUBLE ROW OF
COIR ENVELOPE
AT BASE OF PROTECTION

CONTINUOUS LENGTH AS NECESSARY
3 FT X 3 FT SAND
STACKED AT 2:1 SLOPE

3'-4'

RE-STACK EXISTING ROCK FROM
BEACH TOE BERM
TO RE-STACK STONE TOE BERM
(DEPTH VARIES, MIN. ELEVATION -1.91)

TOE PROTECTION, SEE
PER NRS FIGURE

PROPOSED SANDY BEACH GRASS CLUMP PLANTINGS
ALONG SANDY BEACH ABOVE MEAN HIGH WATER
(PLANTING 10'-24" ON CENTER)

APPROXIMATE ELEVATION VARIES
(MIN. 3' NAVD83)

MHW=-1.90

MHW=-1.91

BLUFF RESTORATION NOTES:

1. CMHC WILL BE NOTIFIED 48 HOURS BEFORE STARTING CONSTRUCTION.
2. AN ENVIRONMENTAL MONITOR OTHER THAN THE CONTRACTOR SHALL BE RETAINED TO OVERSEE CONSTRUCTION. CMHC SHALL BE NOTIFIED OF THE ENVIRONMENTAL MONITOR'S ENGAGEMENT PRIOR TO THE START OF CONSTRUCTION.
3. THE ENVIRONMENTAL MONITOR SHALL SUBMIT A WEEKLY PROGRESS REPORT TO CMHC VIA EMAIL. A FINAL WRITTEN COMPLIANCE REPORT WITH PHOTOGRAPHS SHALL BE SUBMITTED TO CMHC UPON PROJECT COMPLETION.

BLUFF RESTORATION DETAIL

NOT TO SCALE

COASTAL EROSION MANAGEMENT COUNCIL
APPROVED PLAN
DATE 3/19/13
STAFF MEMBER: G. R.
ASSENT NUMBER 6018-03-183

NOTES:
1. FINAL AND PLAN OVERLAY WITH CMHC
2. DIPRETE ENGINEERING, DATED MARCH 12, 2013
3. REFERENCES MADE TO NATURAL RESOURCE
2013.

LOCATION MAP

CHERENZIA
& ASSOCIATES, LTD.

99 Madison St.
Baltimore, MD 21201
Tel: 410.586.7747
Fax: 410.586.7740
www.cherenzia.com

POTOMAC RIVER

NARRAGANSETT BAY

AREA OF
FOCUS

N QUIDNESSETT RD

ESSEX RD

POST RD

ISSUED FOR REVIEW

PREVIOUS APPROVED PLAN
OVERLAY

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

PREPARED FOR
QUIDNESSETT COUNTRY CLUB

SCALE: 1"=20'
CA JOB # 224031
DATE: JAN. 21, 2015

DRAWN BY: AKG
CHECK BY: SPC

PLAN REVISIONS

REV. NO.	DATE	DESCRIPTION	BY	CHK
1	2/13/25	SUPERIMPOSE NRS INFORMATION	AKG	SPC

FIG-1

465



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

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

February 25, 2025

Via Email
Quidnessett Country Club, Inc.
PO Box 860
East Greenwich, RI 02818

**RE: CRMC Cease & Desist Order 23-0185, dated August 28, 2023
Plat 167, Lot 2, 950 North Quidnessett Road, North Kingstown**

Dear Attorney Cervenka,

As per my letters to you dated May 22, 2024, August 2, 2024, October 11, 2024, and November 22, 2024, Quidnessett Country Club, Inc. (QCC) is required to submit a proposed restoration plan prepared by a qualified professional that addresses the following:

- Removal of all unauthorized riprap and fill.
- Nonstructural stabilization of the coastal feature (reference Coastal Resources Management Program, section 1.3.1.(G)).
- Proposed native shrub and tree plantings, of appropriate size and density, throughout all areas of previously vegetated natural buffer zone.
- Restoration must also receive approval from the Army Corps of Engineers.

In your letter to me dated December 6, 2024, you state, "Not waiving our previously asserted objection to the depicted 2013 toe of berm and for the purpose of continuing to work with enforcement staff, QCC agrees to use the toe of the berm for its proposed restoration. However, due to technological advances that were not available in 2013, that toe can be more precisely located than the simple rendition of what is depicted on the 2013 plan". At our meeting held on January 24, 2025, you agreed to submit a plan showing the seaward extent of the approved location of the toe of berm based on the cross section included on the approved 2013 plan ("Site Plan, Quidnessett Country Club", prepared by DiPrete Engineering, last revised on March 12, 2013, and stamped approved by the CRMC on March 19, 2013). On February 7, 2025, a plan titled "Previous Approved Plan Overlay", was submitted that showed the "conceptual build out of the shoreline protection design specified in the cross-section of the 2013 DiPrete approved plan". On the plan titled "Previous Approved Plan Overlay", the blue line labeled, "approximate toe of coir envelope (3' wide top then 0.5:1 slope to elevation 3)", is an acceptable "toe of berm" for use on a proposed restoration plan. The note on the plan that states, "approximate 5-7 feet of stone per aerial images", should be removed from any proposed restoration plans. The 2013 DiPrete plan depicted 3-4 feet of stone at the base of the "toe of berm".

The size of the existing stone to be utilized for toe protection shall be shown on any subsequent submitted plans. The existing stone shall be the stone that was in place prior to the violation. Include details of depth of toe protection. All proposed erosion and sedimentation controls must be shown on the plan. Erosion and sedimentation controls must include the installation of turbidity barriers.

Quidnessett Country Club, Inc.
February 25, 2025
Page Two

CRMC Staff cannot support the adoption of the magenta line shown on the plan titled "Previous Approved Plan Overlay", "which shows the furthest seaward extent of the 2013 installed shoreline protection system", as the as-built extent of the restored bluff was out of compliance with both the "cross-section conceptual build out" and the "double red lines" from the 2013 approved plan.

This matter will be scheduled in front of the Coastal Resources Management Council on April 8, 2025, as an Order to Restore if a complete, acceptable restoration plan as described above is not submitted by March 7, 2025. Please feel free to contact me with any questions in the interim.

Sincerely,



Brian A. Harrington, Environmental Scientist III
Coastal Resources Management Council

/bah

cc via email:

- Janice Matthews
- Robin Main, Esq
- Jeffrey Willis
- Laura Miguel
- Anthony DeSisto, Esq.
- Mark Hartmann, Esq.



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

March 7, 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:

This letter is being provided in response to your letter dated February 25, 2025. In that letter, the agency rejects use of the restoration line established by QCC's 2013 shoreline protection installation, referred to as the "magenta line", as depicted in a Cherenzia plan overlay dated February 14, 2025. Specifically, you indicate that CRMC "cannot support the adoption of the magenta line" because it was "out of compliance" with the approved plan. For reasons stated below, this position is arbitrary and capricious.

The shoreline protection system, designed with coir envelopes ("burritos") and stone toe protection built out from the bluff, was approved by CRMC on March 19, 2013. We have established definitively that the double red lines depicted on the approved plan, prepared for an emergency permit, was only conceptual and did not show any proposed grading. Further, the cross-section itself is stated to be "not to scale". It called for a design of a double row of burritos at the toe of the bluff that would be stacked at a 2:1 slope, with existing stone placed in front of the burritos for toe protection. The Assent conditions allowed existing stone from "within 35 feet" of the bluff to be used for bluff protection. The installed burritos and stone, together with plantings, appear to have been installed *in substantial compliance* with these design parameters.

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

The agency was well aware of and understood the dimensions of the installed restoration. In addition to the agency's regular on-site inspections, the CRMC received weekly progress emails from Mr. Rabideau between late April and June, 2013, and a final as-built graphic was prepared. Independent inspections, weekly reporting, and a final written compliance report were all required by the approved plan. The agency did not indicate at any time during the restoration's multi-week construction or completion that it was "out of compliance". In fact, the shoreline restoration remained in such configuration, albeit eroding, for the better part of a decade without any objection from CRMC, which clearly accepted it as built. Over the last couple of months, the agency has not produced any files that suggest otherwise.¹ Indeed, the agency has been unable to locate any correspondence, inspection reports, or field notes of the two retired staff members who worked on the approval and on-site inspections.

In light of the above, we are requesting that this matter be forwarded to the Administrative Hearing Officer, who is authorized by statute to hear "all contested enforcement proceedings", in order for it to be set down for hearing. *See* R.I. Gen. Laws § 46-23-20. As you know, we had previously requested an administrative hearing per letter dated October 10, 2023 and, again by letter dated May 23, 2024, which request has heretofore been denied.

Sincerely,



Jennifer R. Cervenka

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

¹ On January 29, 2025, the agency informed QCC that it had contacted retired staff members who had worked on the 2013 Assent and neither of them remembered specific details of their site visits. The agency also stated that it had "looked through paper files left behind by staff when they retired" and did not find anything related to QCC.



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

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

March 19, 2025

Via Email
Quidnessett Country Club, Inc.
PO Box 860
East Greenwich, RI 02818

RE: CRMC Cease & Desist Order 23-0185, dated August 28, 2023
Plat 167, Lot 2,950 North Quidnessett Road, North Kingstown

Dear Attorney Cervenka,

On August 28, 2023, Quidnessett Country Club, Inc., was issued CRMC Cease & Desist Order 23-0185, for undertaking unauthorized construction of a rip-rap revetment on a coastal feature, cutting of vegetation on a coastal feature, and filling of tidal waters without a CRMC assent. These unauthorized activities are in violation of the Rhode Island Coastal Resources Management Program.

As per my letters to you dated May 22, 2024, August 2, 2024, October 11, 2024, November 22, 2024, & February 25, 2025, Quidnessett Country Club, Inc. (QCC) was required to submit a proposed restoration plan prepared by a qualified professional that addressed the following:

- Removal of all unauthorized riprap and fill.
- Nonstructural stabilization of the coastal feature (reference Coastal Resources Management Program, section 1.3.1.(G)).
- Proposed native shrub and tree plantings, of appropriate size and density, throughout all areas of previously vegetated natural buffer zone.
- Restoration must also receive approval from the Army Corps of Engineers.

On February 25, 2025, you were sent a letter requiring that you submit a complete, acceptable restoration plan, prepared by a qualified professional, to the CRMC by March 7, 2024. The letter you submitted on March 7, 2025, did not include a complete, acceptable restoration plan. This matter has been scheduled for an Enforcement Hearing in front of the Coastal Council on April 8, 2025, for an Order to Restore.

Sincerely,

Brian Harrington, Environmental Scientist III
Coastal Resources Management Council

/bah

cc via email:

- Janice Matthews, Quidnessett Country Club
- Robin Main, Esq, Hinckley Allen
- Jeffrey Willis, Executive Director, CRMC
- Laura Miguel, Deputy Director, CRMC
- Anthony DeSisto, Esq.; Legal Counsel
- Mark Hartmann, Esq., Asst Legal Counsel



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

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

March 19, 2025

Sent Via Email

Via Email
Quidnessett Country Club, Inc.
PO Box 860
East Greenwich, RI 02818
RE: CRMC Enforcement File No. **23-0185**

NOTICE OF ENFORCEMENT ACTION

Pursuant to statutory authority and the Rules and Regulations of the Coastal Resources Management Council ("CRMC"), the CRMC has reason to believe a violation of the provisions of Chapter 46-23-1 *et seq*, a rule, regulation, assent, order or decision of the CRMC has occurred at your property located at **plat 167, lot 2; 950 North Quidnessett Road, North Kingstown.**

Specifically, the alleged violations are unauthorized construction of a rip-rap revetment on a coastal feature, cutting of vegetation on a coastal feature, and filling of tidal waters.

If proven, these activities constitute a violation of the Red Book (650-RICR-20-00-1) § 1.3.1 (B)(1)(b), § 1.3.1 (G)(1)(a), § 1.3.1 (G)(1)(d), § 1.3.1 (G)(3)(c), & § 1.3.1 (G)(3)(c).

A hearing will be held before the Full Council to consider an **Order to Restore.**

The hearing before the CRMC is scheduled for **Tuesday, April 8, 2025; 6:00 p.m. in Conference Room A, at the State of Rhode Island Administration Building, One Capitol Hill, Providence, RI.**

You have a right to present evidence before the CRMC and to cross-examine or rebut any testimony proffered by CRMC staff. Additionally, any written reports and/or exhibits intended to be utilized by CRMC staff are available for your inspection as the office of the Coastal Resources Management Council, Oliver H. Stedman Government Center, 4808 Tower Hill Road, Suite 3, Wakefield, RI 02879.

Sincerely,

Laura Miguel, Deputy Director
Coastal Resources Management Council

/lat

cc: Jenn Cervenka, Esq. (Via Email)
Robin Main, ESQ.
Janice Matthews

Quidnessett Country Club Photos

From bharrington@crmc.ri.gov <bharrington@crmc.ri.gov>

Date Wed 3/26/2025 3:19 PM

To Jennifer Cervenka <jcervenka@cgdesq.com>

Cc Jeff Willis <jwillis@crmc.ri.gov>; 'Laura Miguel' <lmiguel@crmc.ri.gov>; 'De Sisto, Tony' <adlawllc@gmail.com>; 'Mark Hartmann, Esq.' <mhartmann@adlawllc.net>; Main, Robin L. <rmain@hinckleyallen.com>; Janice Mathews <janicem@jancompanies.com>; Lisa Turner <lturner@crmc.ri.gov>

Hi Jenn,

While conducting a search of share files, unrelated to the QCC matter, CRMC staff came across photos of the shoreline at Quidnessett Country Club. They were in a folder named "Janet Photos", but I don't know if she took them, or if they were sent to her. I left the names of the photos and the EXIF data as they were found. The link below should take you to the photos. Please let me know if you have any issues accessing them.

 [Photos](#)

Thank you,
Brian

Brian A. Harrington, Environmental Scientist III
Coastal Resources Management Council
4808 Tower Hill Road
Wakefield, RI 02879

Office 401-783-3370
Email bharrington@crmc.ri.gov



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

March 27, 2025

VIA EMAIL ONLY

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

Re: Access to Public Records Request per R.I. Gen. Laws § 38-2-1 et seq. and
650-RICR-10-00-1.15

Dear Records Officer:

Pursuant to R.I. Gen. Laws §38-2-3 and 650-RICR-10-00-1.15(D), on behalf of the
Quidnessett Country Club, please accept this as a request for the following public records:

Any and all documents from 2012 through the present related to the Rhode Island
Coastal Resources Management Council's ("CRMC") Emergency General Permit
issued to Quidnessett Country Club, Inc., located at 950 North Quidnessett Road,
North Kingstown (Plat 167, Lot 2), CRMC File No. 2013-03-133, and the Assent
Submission Plans approved on March 19, 2013, including but not limited to any
reports referenced in the Assent, investigation reports, engineering or coastal
geologist reports, field notes, inspection notes, photographs, environmental monitor
status emails or reports, as-built reports, photographs, emails or other
communications from Scott Rabideau or DiPrete Engineering, and any and all other
documents prepared by, relied upon, received by, or reviewed by CRMC staff,
including former supervising environmental scientist David Reis and coastal
geologist Janet Freedman.

I request that the records be provided in electronic format, if available. If any of the
requested records are denied, or are missing, unavailable, or have been destroyed, please

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

provide a written explanation stating the reason for their denial or absence, including the date and basis for any destruction or loss, pursuant to R.I. Gen. Laws §38-2-7.

Sincerely,

A handwritten signature in blue ink, appearing to read 'JRC', is positioned above the printed name.

Jennifer R. Cervenka

cc: Janice Mathews, QCC
Robin L. Main, Hinkley Allen
Anthony DeSisto, CRMC Chief Legal Counsel
Jeffrey M. Willis, CRMC Executive Director
Brian Harrington, CRMC, Environmental Scientist III



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

March 28, 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:

This letter is being provided in response to your letter dated March 19, 2025. In that letter, you stated that QCC has not submitted a complete, acceptable restoration plan. As you know, QCC has been working with enforcement staff on a restoration plan since last summer, having submitted three proposed plans, the last one being submitted on November 1, 2024. Since that time, QCC and the agency have met and exchanged documents and other information related to how far seaward the shoreline protection could extend, based upon the approved restoration in 2013. Despite compelling evidence of it extending to what's been referred to as the "magenta line", the agency rejected that line as non-compliant. Just this week, however, the agency produced pictures presumably taken by former CRMC staff (Janet Freedman), which corroborates that the shoreline protection did indeed extend well out from the bluff and close to the waterline, as documented on multiple occasions by staff. In light of that, we are submitting a final restoration plan which addresses the agency's last set of comments on November 22, 2024 and locates the shoreline protection at or landward of the magenta line.

While we had requested that the matter be set down for hearing before the Administrative Hearing Officer, who is authorized by statute to hear "all contested enforcement proceedings", the agency has ignored that request and instead scheduled an

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

J75

enforcement hearing before the Council on April 8, 2025. We believe that such a hearing is procedurally inappropriate. Notwithstanding and subject to our objection, we will be prepared to present the attached restoration plan at that meeting.

Sincerely,

A handwritten signature in blue ink, appearing to read 'JRC', with a stylized flourish extending to the right.

Jennifer R. Cervenka

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



Civil Engineers • Land Surveyors
Land Use Planners • Environmental Consultants

Raymond F. Cherenzia, P.E., L.S., Founder
Sergio F. Cherenzia, P.E., President

March 28, 2025

Brian A. Harrington, Environmental Scientist
RI CRMC
Oliver H. Stedman Government Center
4808 Tower Hill Rd, Suite 3
Wakefield, RI 02879-1900

Subject: Response to Comments- CRMC Cease & Desist Order 23-0185
Quidnessett Country Club
950 North Quidnessett Rd
N Kingstown, RI
AP 167 Lot 2

Dear Mr. Harrington:

Cherenzia & Associates, Ltd. (Cherenzia) has reviewed the above-referenced Comment Letter dated November 22, 2024 and offers our responses to these comments below. Revised documents based on these comments are included with this resubmittal and are listed below:

- a. Site Plans (24" x 36") titled, "Quidnessett Country Club" Sheets C-1 through C-3, prepared by Cherenzia & Associates, Ltd., dated August 16, 2024, last revised March 28, 2025.

REVIEW COMMENTS:

1. *As discussed above, shoreline protection that extends further seaward than previously authorized constitutes a prohibited activity (CRMP § 1.3.1 (G)(3)(c)) requiring a Special Exception (CRMP §1.1.8).*

Response to Comment: The proposed shoreline protection extends no further seaward than what was authorized in 2013 per the Emergency General Permit, 2013-03-133. Said permit authorized a design of a double row of burritos at the toe of the bluff that would be stacked at a 2:1 slope, with existing stone within 35 feet of the bluff placed in front of the burritos for toe protection. The installed system was overseen by an environmental monitor and inspected multiple times by CRMC staff. CRMC's contemporaneous photographs of the installed system are consistent with 2013-2014 aerials showing the extent of the as-built condition, reflected as the magenta line on the site plan.

2. *The "Stone Toe Protection" plan detail proposes using geotextiles. Geotextiles cannot be used in nonstructural shoreline protection (CRMP § 1.1.2 (A.97)).*

Response to Comment: The toe protection detail has been removed from the revised Site Plan as the proposed coconut core log system will provide the necessary drainage.

3. *The "Stone Toe Protection" plan detail proposes bringing in stones to supplement existing authorized stone. Bringing in stones from off site and using them in the restoration of the coastal feature is not allowed (CRMP § 1.3.1(G)(3)(c)).*

Response to Comment: References regarding bringing in stones from offsite for stone toe protection have been removed. The only stone potentially imported will be 3" – 16" boulder and cobble size class consistent with natural rocky shoreline. The purpose of this will be to facilitate the natural shoreline and is not sized to armor the bank.

4. *The "Stone Toe Protection" plan detail proposes burying stone toe protection and "only existing beach stone from the immediate vicinity (generally within 35 feet) of the eroded bluff may be used for bluff protection ... ". As permitted by CRMC assent 2013-03-133 and shown on the plan titled "Quidnessett Country Club", prepared by Diprete Engineering, dated March 12, 2013, existing riprap may be restacked as a toe berm along the base of the proposed nonstructural shoreline protection.*

Response to Comment: The detail and notes have been revised. (See sheet C-1 note 4).

5. *All proposed erosion and sedimentation controls must be shown on the plan and follow the Rhode Island Soil Erosion and Sediment Control Handbook.*

Response to Comment: All proposed Erosion and Sediment Controls are noted on the revised Site Plan and follow the Rhode Island Soil Erosion and Sediment Control handbook.

6. *Proposed native plantings, including species, density, and location must be shown on the proposed plan. Recommended density, coverage, and minimum planting size can be found in the "Coastal Buffer Zone Planting Guide", revised 2008. Appropriate native plants proposed must be listed in the "Rhode Island Native Plant Guide", revised 2024.*

Response to Comment: Additional planting notes have been added to the plan along with sheet C-3, "Planting Plan".

7. *The proposed plan states "Existing stone below HTL to be removed and replaced with beach sand". This 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).*

Response to Comment: This note has been added to the site plan (See sheet C-1 note 12).

I trust that these responses adequately address the comments received. Should you have any additional questions or concerns, please do not hesitate to contact me at 401-596-7747.

Sincerely,



Sergio F. Cherenzia, P.E.
President

Quidnessett Country Club - Enforcement File No. 2023-0185 - Prehearing Memorandum for Council Meeting on April 8, 2025

From Jennifer Cervenka <jcervenka@cgdesq.com>

Date Fri 3/28/2025 3:07 PM

To Jeff Willis <jwillis@crmc.ri.gov>; De Sisto, Tony <adlawllc@gmail.com>

Cc Janice Mathews <janicem@jancompanies.com>; Main, Robin L. <rmain@hinckleyallen.com>; Brian Harrington <bharrington@crmc.ri.gov>; Lisa Turner <lturner@crmc.ri.gov>; Cstaff <cstaff1@crmc.ri.gov>

 1 attachment (126 KB)

QCC Prehearing Memorandum 03_28_25.pdf;

Good afternoon Jeff and Tony:

Please see attached Quidnessett Country Club's Prehearing Memorandum, submitted for the enforcement hearing scheduled before the Council on April 8, 2025. Below is a Dropbox link to the documents listed in the Memorandum. A hard copy is being overnighted to Jeff.

<https://www.dropbox.com/t/ahkpRDTkLcotBI6i>

Thank you,

Jenn

Jennifer Cervenka | Member



cervenka green & ducharme llc


225 Dyer Street, 2nd Floor

Providence, RI 02903

(401) 214-1022 (office)

(401) 480-8768 (mobile)

jcervenka@cgdesq.com



**CHERENZIA
& ASSOCIATES, LTD.**

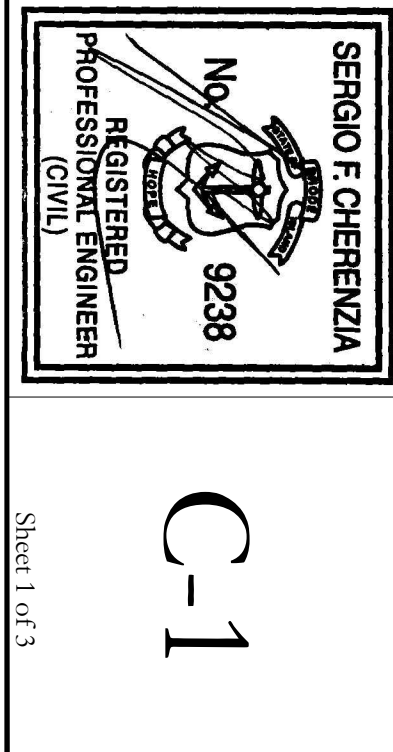
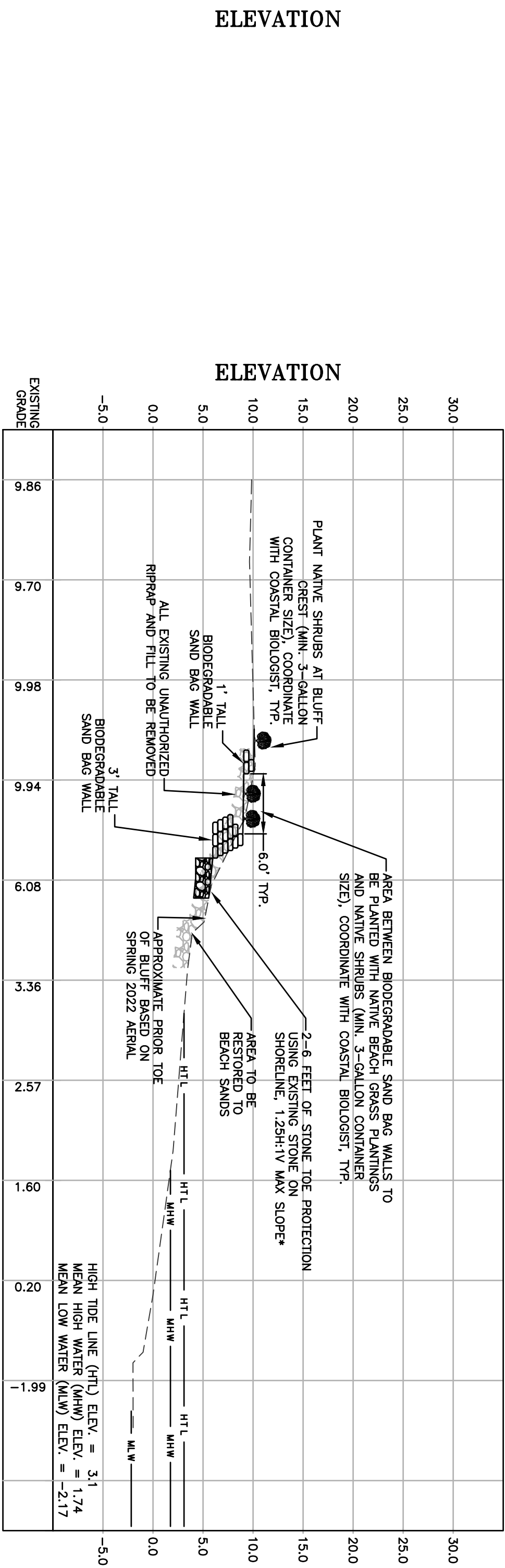
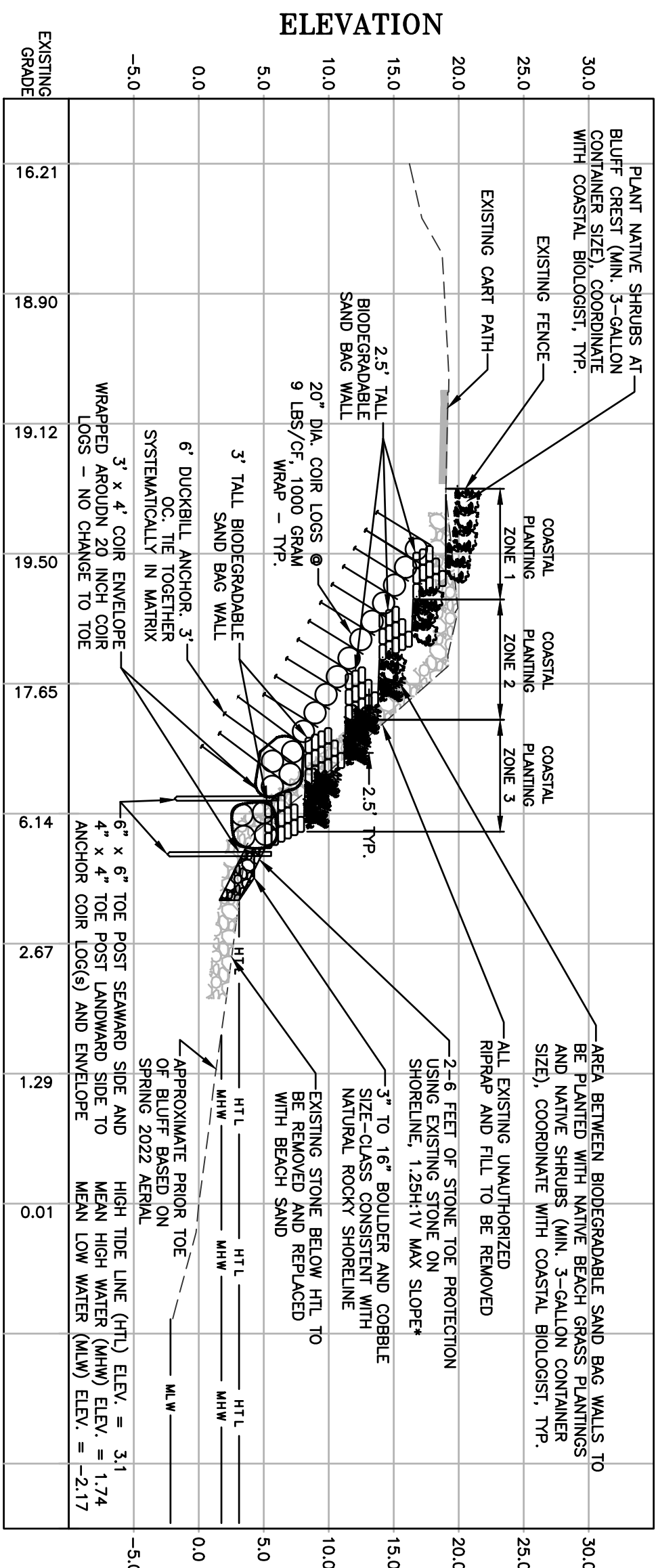
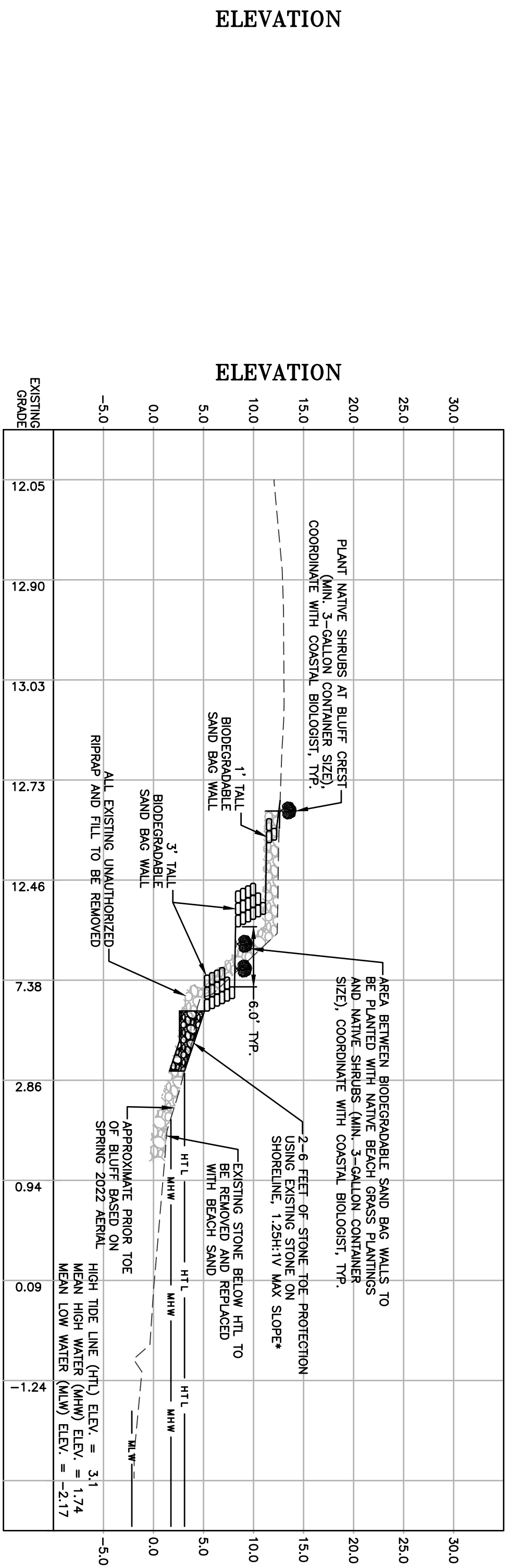
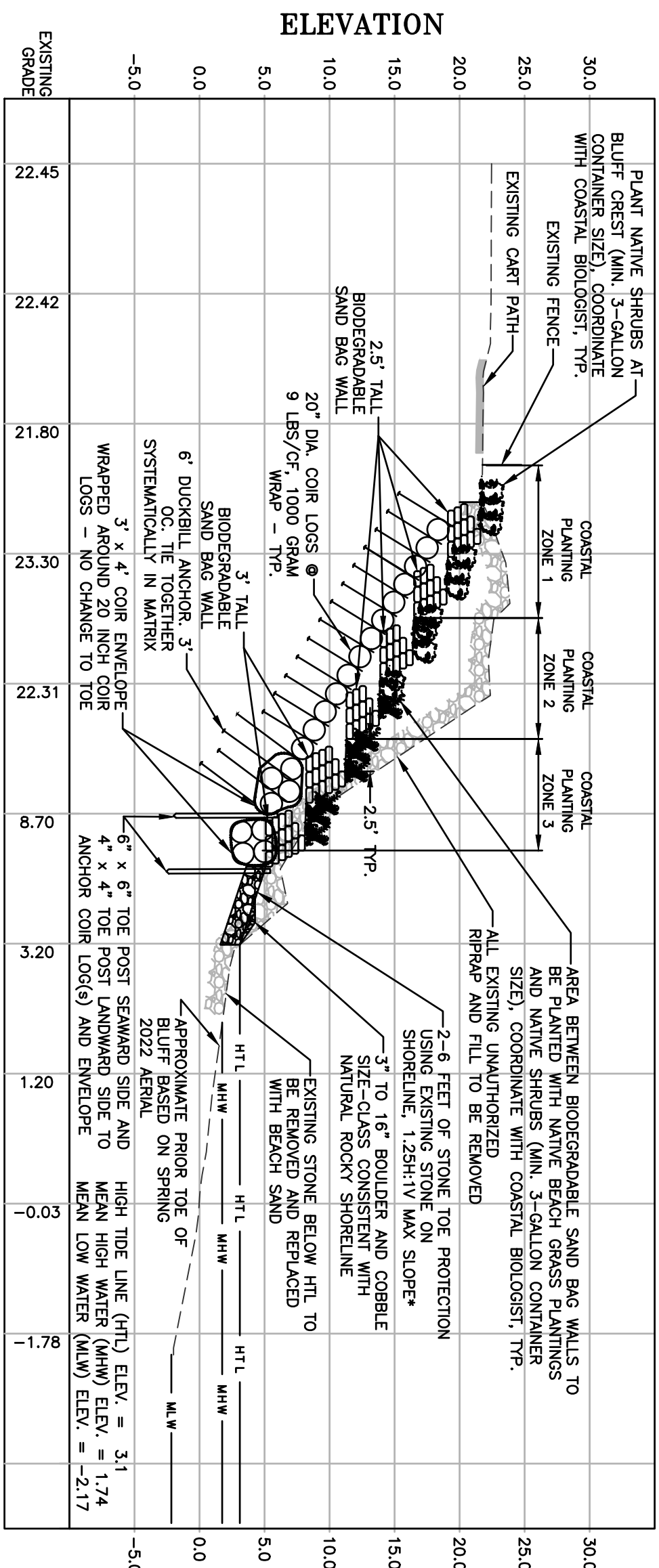
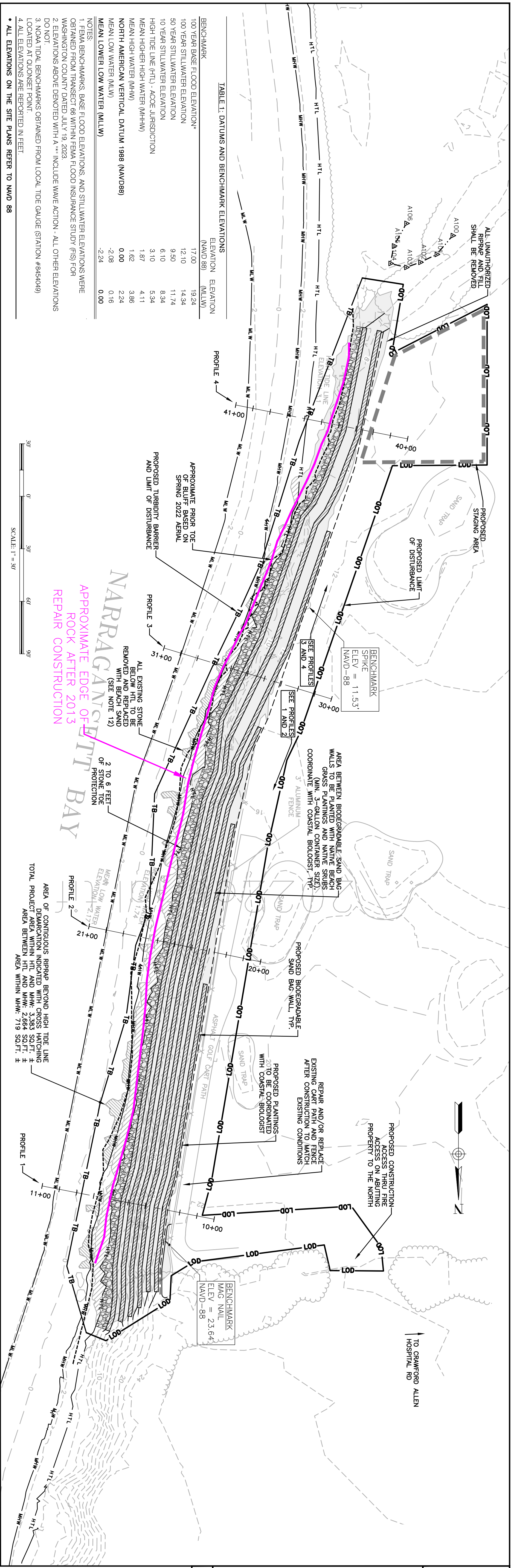
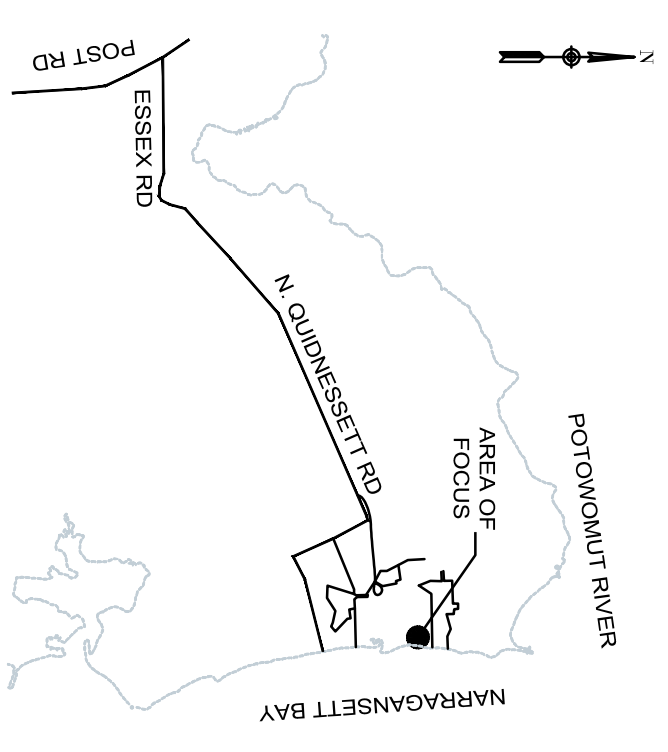
99 Machine St.
Pawcatuck, CT 06259
Tel. 861.629.6500
Fax: 861.599.6006

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

**Civil Engineers
Land Surveyors
Land Use Planners**

Environmental Engineers

www.cherenzia.com



COASTAL RESTORATION PLAN

QUINNESSETT COUNTRY CLUB
950 NORTH QUINNESSETT ROAD
PLAT 167 LOT 2
NORTH KINGSTOWN, RHODE ISLAND

PREPARED FOR
QUINNESSETT COUNTRY CLUB

ISSUED FOR REVIEW

SCALE: AS NOTED CAJOB # 224031 DATE: AUG. 16, 2024	DRAWN BY: AKG CHECK BY: SFC
--	--------------------------------

DATE	REVISION

11. THE LAND HEREIN IS DESCRIBED BY A EMBARRASSED SURVEY OF THE LANDS OF THE STATE OF NEW YORK, BEING RECORDED AFTER 1840, THE SURVEY BEING AS FOLLOWS:

12. EXISTING STONE, BELOW IT, TO BE REMOVED AND REPLACED WITH BEACH SAND. THIS SAND SHALL COME FROM AN UPLAND SOURCE AND CONSIST OF NATURAL SAND GRAINS THAT ARE SIMILAR IN GRAIN SIZE, SHAPE, AND COMPOSITION TO SAND FOUND IN THE BEACHES OF THE ADJACENT OCEAN. THERE SHALL BE NO MORE SAND STONE GRAINS AND NO SAND NOT RECOVERED FROM THE ACTIVE COASTAL FEATURES (E.G., DUNES AND BEACHES).

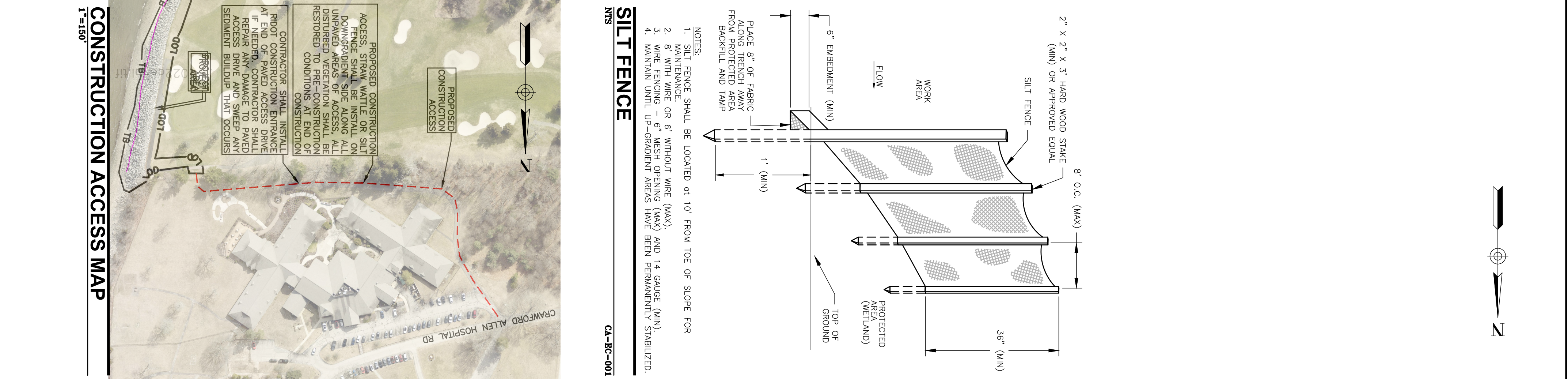
PLAN REFERENCES:

1. SURVEY PLAN PREPARED BY CHENEVIA & ASSOCIATES, LTD. TITLED EXISTING CONDITIONS PLAN, DATA ACCUMULATION SURVEY, PREPARED FOR DOWDNEYSETT COUNTY CLUB DATED JUNE 17, 2024 REVISED JULY 23, 2024.

5. UNDESIRABLE ADORNMENTS BY CMC.
6. NO CONSTRUCTION DEEDS, INCLUDING ANY EXISTING SHOULDER DEEDS MAY BE USED TO PROTECT ERODED AREAS BY PLACING AGAINST THE SCARP.
7. UNDESIRABLE BIOMATERIALS SHALL BE UTILIZED.
8. BIODEGRADABLE SOD BARS SHALL BE BEDDED IN BEDROCK.
9. VEGETATION SHALL BE COORDINATED WITH A COASTAL BIOLOGIST. NATIVE PLANTS WILL BE SELECTED FROM THE CMC COASTAL BUFFER ZONE PLANTING GUIDE (REVISED AUGUST 2008).
10. CHENEWA MAKES NO GUARANTEES OF THE ACCURACY OF THIS REPORT.

[illegible]

LOCATION MAP





SERGIO F. CHERENZIA
REGISTERED
PROFESSIONAL ENGINEER
(CIVIL)

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

99 Machine St.
Pawtucket, RI 02861
Tel: 866/229-6580
Tel: 401/929-9999

P.O. Box 515
Westerly, RI 02801
Tel: 401/596-7747

www.cherenzia.com

PREPARED FOR
QUIDNESSETT COUNTRY CLUB

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

ISSUED FOR REVIEW

**SOIL EROSION AND SEDIMENT
CONTROL PLAN**

SCALE: AS NOTED
CA JOB # 22031
DATE: AUG. 16, 2024

PLAN REVISIONS			
REV. NO.	DATE	DESCRIPTION	
1	9/20/24	CNAC COMMENTS	DOWN CLR BY HY
2	10/30/24	CNAC COMMENTS	AKG SFC
3	03/28/25	CNAC COMMENTS	AKG SFC K. AG

DRAWN BY: AKG
CHECK BY: SFC

99 Machine St.
Pawtucket, RI 02861
Tel: 866/229-6580
Tel: 401/929-9999



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

April 7, 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:

This is in reference to the Notice of Enforcement Action issued in the above matter. That Notice indicated that a hearing would be held before the Council at its April 8, 2025 meeting. However, the CRMC's published agenda does not include notice of such a hearing. Accordingly, we will not appear on April 8.

Please be advised that we are making changes to the plan submitted to CRMC. Accordingly, we are withdrawing the plan submitted on March 28, 2025, and will submit updated information shortly.

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

Sincerely,



Jennifer R. Cervenka

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

Re: Quidnessett Country Club - CRMC Enforcement File No. 23-0185

From Brian Harrington <bharrington@crmc.ri.gov>

Date Thu 4/10/2025 12:02 PM

To Jennifer Cervenka <jcervenka@cgdesq.com>

Cc Janice Mathews <janicem@jancompanies.com>; Main, Robin L. <rmain@hinckleyallen.com>; sergio@cherenzia.com <sergio@cherenzia.com>; jklinger@ecotonesinc.com <jklinger@ecotonesinc.com>; josh@rmahydro.com <josh@rmahydro.com>; De Sisto, Tony <adlawllc@gmail.com>; Jeff Willis <jwillis@crmc.ri.gov>; Waterhouse, Elizabeth C CIV USARMY CENAE (USA) <Elizabeth.C.Waterhouse@usace.army.mil>; Laura Miguel <lmiguel@crmc.ri.gov>

Hi Jenn,

A new plan and/or any additional information must be submitted by Friday, April 18, 2025.

Thank you,
Brian

Brian A. Harrington, Environmental Scientist III
Coastal Resources Management Council
4808 Tower Hill Road
Wakefield, RI 02879

Office 401-783-3370
Email bharrington@crmc.ri.gov

From: Jennifer Cervenka

Sent: Monday, April 7, 2025 4:29 PM

To: Brian Harrington

Cc: Janice Mathews; Main, Robin L.; sergio@cherenzia.com; jklinger@ecotonesinc.com; josh@rmahydro.com; De Sisto, Tony; Jeff Willis; Waterhouse, Elizabeth C CIV USARMY CENAE (USA)

Subject: Quidnessett Country Club - CRMC Enforcement File No. 23-0185

Good afternoon Brian,

Please see the attached correspondence.

Best,
Jenn

Jennifer Cervenka | Member



cervenka green & ducharme llc

225 Dyer Street, 2nd Floor
Providence, RI 02903
(401) 214-1022 (office)
(401) 480-8768 (mobile)
jcervenka@cgdesq.com



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

April 14, 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:

Thank you for your email on April 10, 2025, in which you state that any new plan or additional information must be submitted by Friday, April 18, 2025. Several members of our legal and engineering team are out-of-state or out of the country this week and, therefore, we will not be able to submit anything by this Friday. Further, CRMC has extended its date to respond to our APRA request for files relevant to restoration of the subject shoreline until May 9th. We would like to review any produced records before submission of any additional plans or information. Accordingly, we suggest a submission date that is at least two weeks after CRMC produces its records, or by May 23, 2025.

cervenka green & ducharme llc

225 Dyer Street, 2nd Floor, Providence, RI 02903

www.cgdesq.com | p: (401) 214-1020

J87

Sincerely,



Jennifer R. Cervenka

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

Quidnessett Country Club, CRMC File No. 23-0185

From Jennifer Cervenka <jcervenka@cgdesq.com>

Date Mon 5/5/2025 5:00 PM

To Jeff Willis <jwillis@crmc.ri.gov>; De Sisto, Tony <adlawllc@gmail.com>; Brian Harrington <bharrington@crmc.ri.gov>; Lisa Turner <lturner@crmc.ri.gov>

Cc Janice Mathews <janicem@jancompanies.com>; Main, Robin L. <rmain@hinckleyallen.com>

 1 attachment (157 KB)

QCC Motion to Assign to HO 5_5_25.pdf;

Good afternoon,

Attached please find a Motion to Assign to a Hearing Officer in the above matter.

Thank you,
Jenn

Jennifer Cervenka | Member



cervenka green & ducharme llc

225 Dyer Street, 2nd Floor

Providence, RI 02903

(401) 214-1022 (office)

(401) 480-8768 (mobile)

jcervenka@cgdesq.com

**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

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.
Hinkley Allen
100 Westminster St., Suite 1500
Providence, RI 02903
T: (401) 274-2000
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

Re: Quidnessett Country Club - CRMC Enforcement File No. 23-0185

From Brian Harrington <bharrington@crmc.ri.gov>

Date Fri 5/9/2025 9:57 AM

To Jennifer Cervenka <jcervenka@cgdesq.com>

Cc Janice Mathews <janicem@jancompanies.com>; Main, Robin L. <rmain@hinckleyallen.com>; sergio@cherenzia.com <sergio@cherenzia.com>; jklinger@ecotonesinc.com <jklinger@ecotonesinc.com>; josh@rmahydro.com <josh@rmahydro.com>; De Sisto, Tony <adlawllc@gmail.com>; Jeff Willis <jwillis@crmc.ri.gov>; Waterhouse, Elizabeth C CIV USARMY CENAE (USA) <Elizabeth.C.Waterhouse@usace.army.mil>; Laura Miguel <lmiguel@crmc.ri.gov>

Hi Jenn,

CRMC responded to your records request yesterday. This matter has gone on for far too long. A new plan and/or any additional information must be submitted within 7 days, by Friday, May 16, 2025.

Thank you,
Brian

Brian A. Harrington, Environmental Scientist III
Coastal Resources Management Council
4808 Tower Hill Road
Wakefield, RI 02879

Office 401-783-3370
Email bharrington@crmc.ri.gov

From: Jennifer Cervenka <jcervenka@cgdesq.com>

Sent: Monday, April 14, 2025 4:06 PM

To: Brian Harrington <bharrington@crmc.ri.gov>

Cc: Janice Mathews <janicem@jancompanies.com>; Main, Robin L. <rmain@hinckleyallen.com>; sergio@cherenzia.com <sergio@cherenzia.com>; jklinger@ecotonesinc.com <jklinger@ecotonesinc.com>; josh@rmahydro.com <josh@rmahydro.com>; De Sisto, Tony <adlawllc@gmail.com>; Jeff Willis <jwillis@crmc.ri.gov>; Waterhouse, Elizabeth C CIV USARMY CENAE (USA) <Elizabeth.C.Waterhouse@usace.army.mil>; Laura Miguel <lmiguel@crmc.ri.gov>

Subject: RE: Quidnessett Country Club - CRMC Enforcement File No. 23-0185

Good afternoon Brian,

Please see the attached correspondence.

Thank you
Jenn



225 Dyer Street, 2nd Floor
Providence, RI 02903
(401) 214-1022 (office)
(401) 480-8768 (mobile)
jcervenka@cgdesq.com

From: Brian Harrington <bharrington@crmc.ri.gov>
Sent: Thursday, April 10, 2025 12:03 PM
To: Jennifer Cervenka <jcervenka@cgdesq.com>
Cc: Janice Mathews <janicem@jancompanies.com>; Main, Robin L. <rmain@hinckleyallen.com>;
sergio@cherenzia.com; jklinger@ecotonesinc.com; josh@rmahydro.com; De Sisto, Tony <adlawllc@gmail.com>;
Jeff Willis <jwillis@crmc.ri.gov>; Waterhouse, Elizabeth C CIV USARMY CENAE (USA)
<Elizabeth.C.Waterhouse@usace.army.mil>; Laura Miguel <lmiguel@crmc.ri.gov>
Subject: Re: Quidnessett Country Club - CRMC Enforcement File No. 23-0185

Hi Jenn,

A new plan and/or any additional information must be submitted by Friday, April 18, 2025.

Thank you,
Brian

Brian A. Harrington, Environmental Scientist III
Coastal Resources Management Council
4808 Tower Hill Road
Wakefield, RI 02879

Office 401-783-3370
Email bharrington@crmc.ri.gov

From: Jennifer Cervenka
Sent: Monday, April 7, 2025 4:29 PM
To: Brian Harrington
Cc: Janice Mathews; Main, Robin L.; sergio@cherenzia.com; jklinger@ecotonesinc.com;
josh@rmahydro.com; De Sisto, Tony; Jeff Willis; Waterhouse, Elizabeth C CIV USARMY CENAE (USA)
Subject: Quidnessett Country Club - CRMC Enforcement File No. 23-0185

Good afternoon Brian,

Please see the attached correspondence.

Best,
Jenn

Jennifer Cervenka | Member



225 Dyer Street, 2nd Floor

Providence, RI 02903

(401) 214-1022 (office)

(401) 480-8768 (mobile)

jcervenka@cghdesq.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.

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

J98

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,

A handwritten signature in blue ink, appearing to read 'JRC', with a stylized flourish at the end.

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

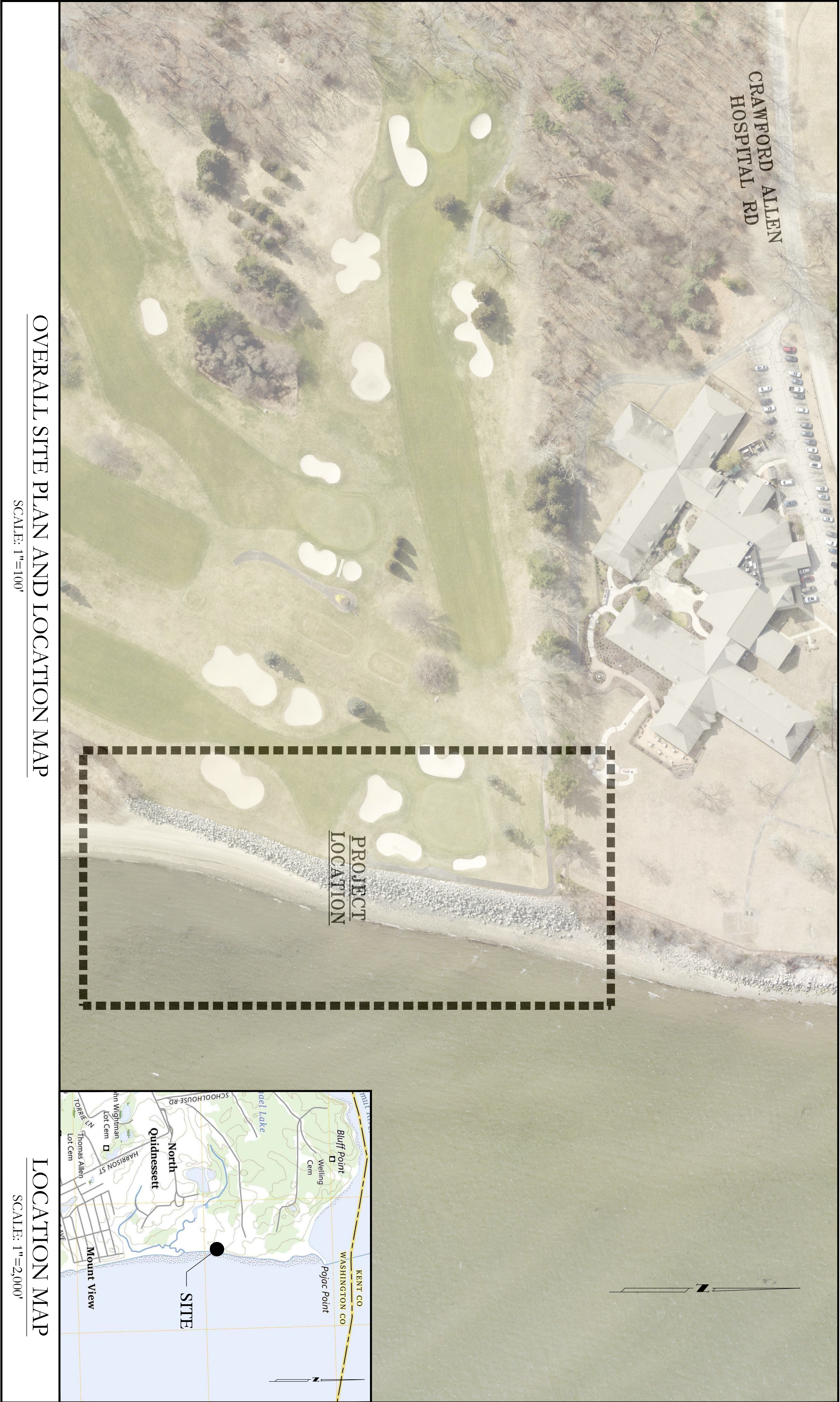
ISSUED FOR PERMITTING

PREPARED FOR

QUIDNESSETT COUNTRY CLUB INC.

DATE ISSUED: MAY 16, 2025

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



PROJECT TEAM
CIVIL & GEOENVIRONMENTAL ENGINEER:



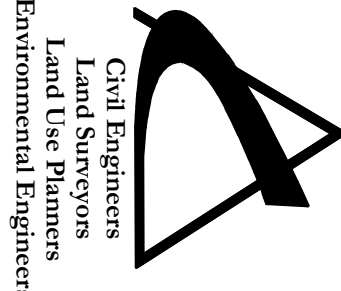
RMA ENVIRONMENTAL LLC
20 MAIN STREET
NORTH KINGSTOWN, RI 02882

ENVIRONMENTAL SCIENTIST:



ECOTONES, INC.
ENVIRONMENTAL CONSULTANTS
PO BOX 114
EAST GREENWICH, RHODE ISLAND 02818
PHONE: 401-266-5800
FAX: 401-266-5801

LAND SURVEYOR & CIVIL ENGINEER:



Cherenzia & Associates, Ltd.
Land Surveyors
Environmental Engineers

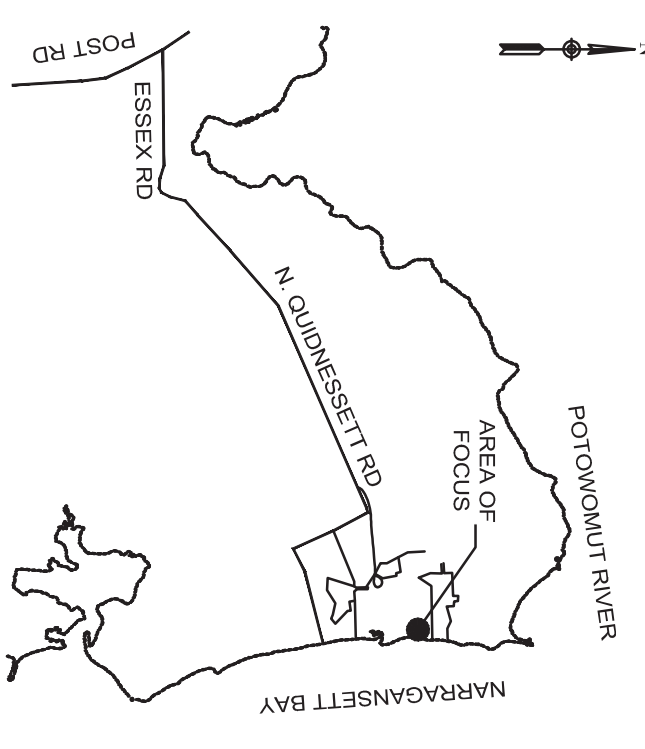


ISSUED FOR REGULATORY REVIEW
ONLY - NOT FOR CONSTRUCTION

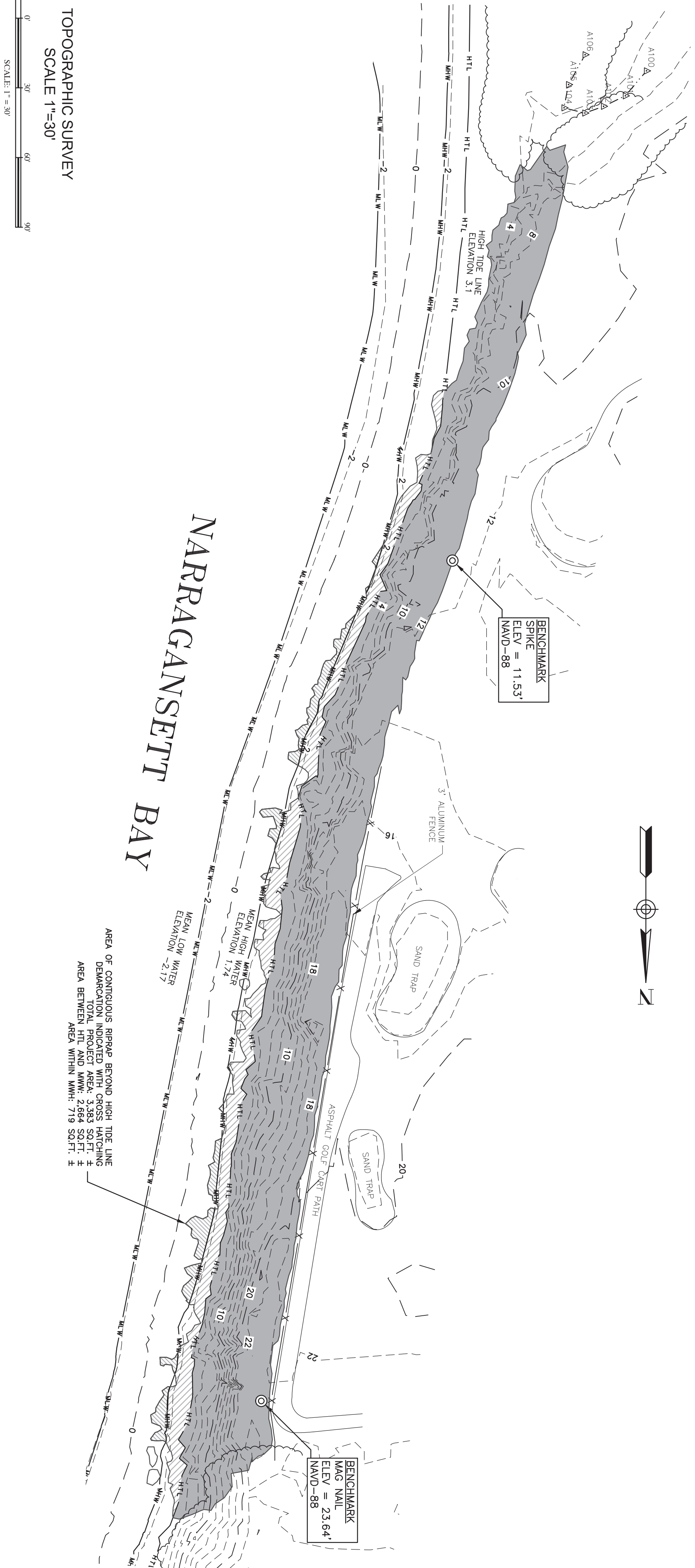
OWNER/APPLICANT
QUIDNESSETT COUNTRY CLUB INC.
PO BOX 860
EAST GREENWICH, RHODE ISLAND 02818

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



TOPOGRAPHIC SURVEY
SCALE 1"=30'



ORTHOMOSIAC
SCALE 1"=30'
IMAGE DATE JULY 17, 2024
SCALE 1"=30'

NOTES:

- ELEVATIONS ARE REFERENCED TO THE NORTH AMERICAN VERTICAL DATUM OF 1988 (NAVD-88). VERTICAL CONTROL DERIVED FROM GNSS OBSERVATIONS UTILIZING THE CIDIOT ACORN RTK NETWORK WITH CORS ID REFERENCE "JRL", KINGSTON, RI, & GEOD MODEL GEOD18.
- 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 GNS OBSERVATIONS AND THE USE OF UNMANNED AERIAL SYSTEMS (UAS) EQUIPPED WITH A HESAI PAIDAR X132 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-00-19 OF THE RULES AND REGULATIONS ADOPTED BY THE RHODE ISLAND STATE BOARD OF PROFESSIONAL LAND SURVEYORS ON NOVEMBER 29, 2019, AS FOLLOWS:

TYPE OF SURVEY: MEASUREMENT SPECIFICATION: DATA ACCUMULATION-PLANIMETRICS TOPOGRAPHY CLASS III CLASS I-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:

PLS SIGNATURE

MARK A. CASTELLANOS PLS #2511

PRINTED PLS NAME & LICENSE NO.

LS.0004133-COA

PLAN REVISIONS			DATE	DESCRIPTION	BY	CHK
1	7-3-24	HIGH TIDE LINE, WETLAND	JF	MC	MC	MC
1	7-23-24	UPDATED TOPOGRAPHY	JF	MC	MC	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

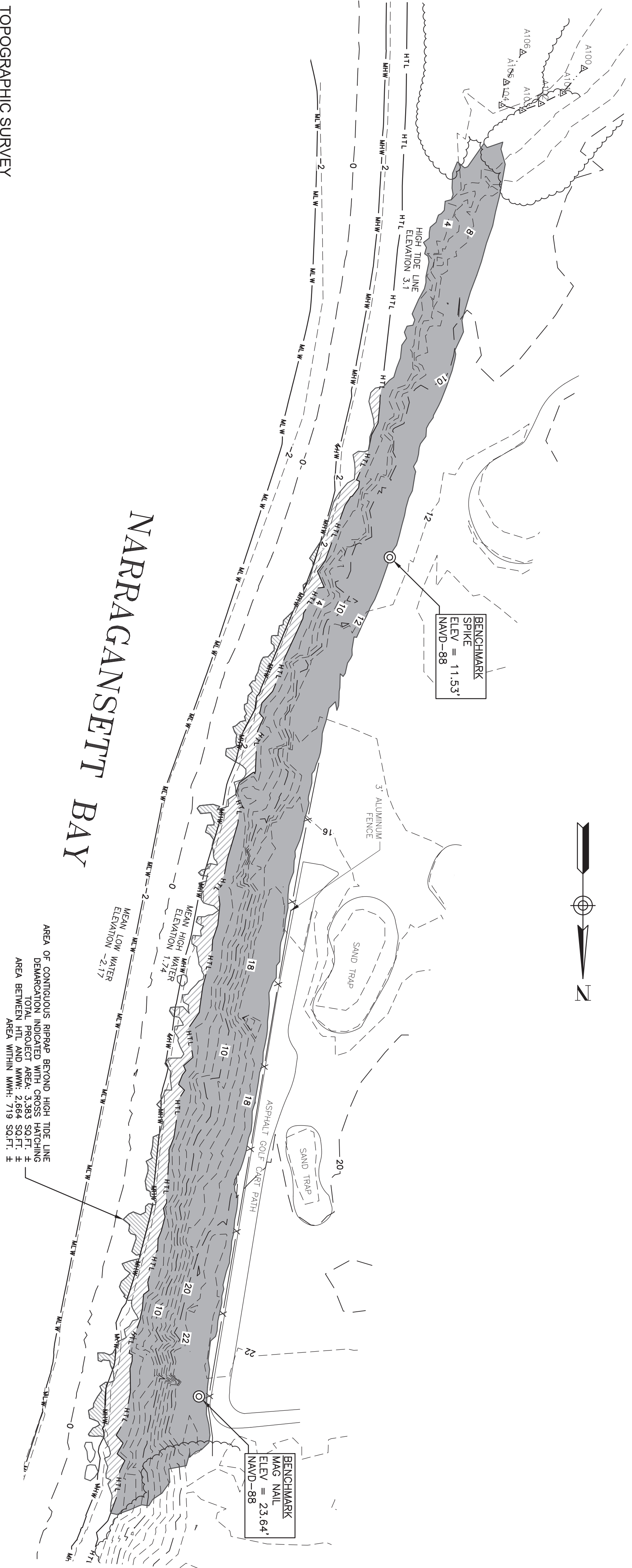
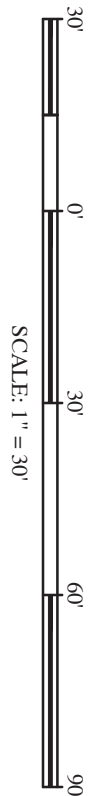
MARK A. CASTELLANOS

PLS SIGNATURE
MARK A. CASTELLANOS PLS #2511
PRINTED PLS NAME & LICENSE NO.
LS.0004133-COA

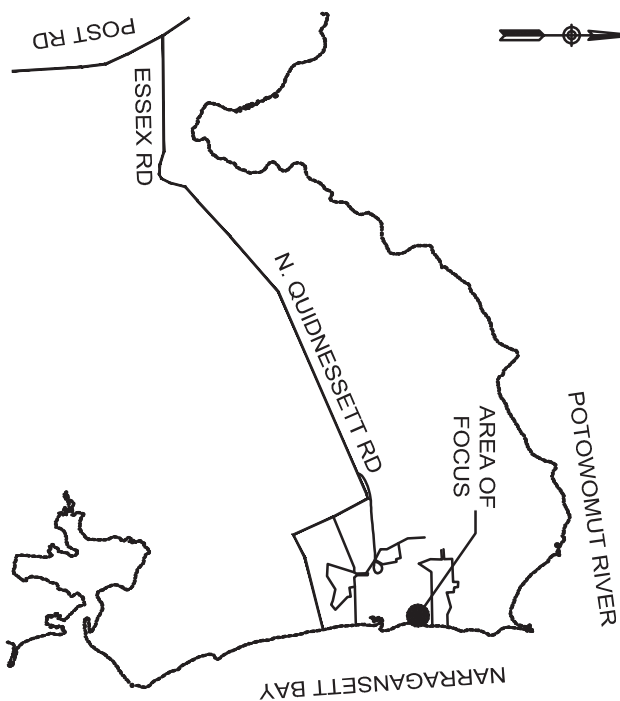
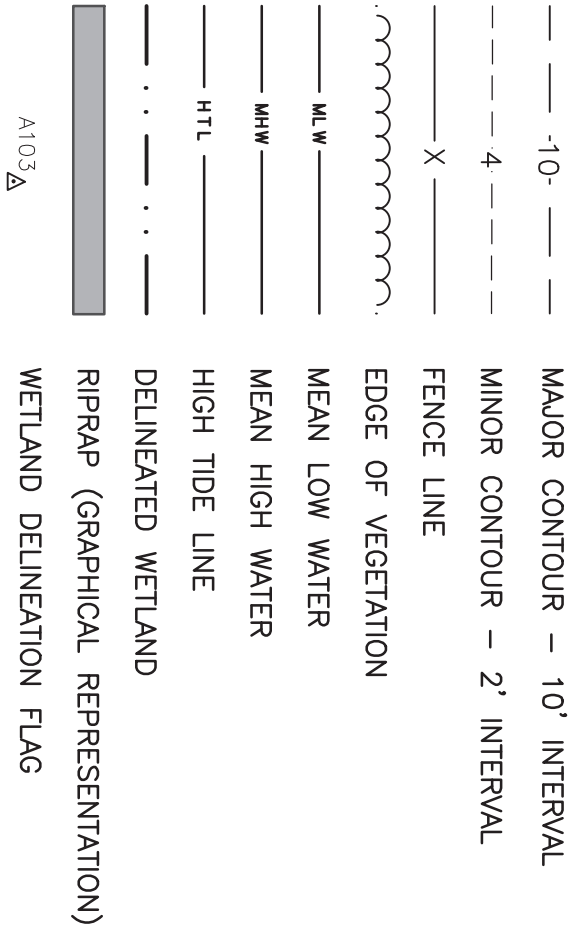
SV-1

APPENDIX 3
PROPOSED RESTORATION PLANS (5)

- J105.** Coastal Restoration Plan, dated August 16, 2024
- J107.** Coastal Restoration Plan, dated revised September 20, 2024
- J110.** Coastal Restoration Plan (with “DiPrete Line”), dated revised October 30, 2024
- J111.** Coastal Restoration Plan, dated revised March 28, 2025
- J114.** Coastal Restoration Site Development Plans (4 sheets), dated May 16, 2025



LEGEND



LOCATION MAP

CHERENZIA & ASSOCIATES, LTD.
99 Medicine St.
P.O. Box 513
Westport, RI 02891
Tel: 401.396.7147
www.cherenzia.com

Chris E. Cherenzia
Land Surveyors
Environmental Engineers

NOTES:

- ELEVATIONS ARE REFERENCED TO THE NORTH AMERICAN VERTICAL DATUM OF 1988 (NAVD-88). VERTICAL CONTROL DERIVED FROM GNSS OBSERVATIONS UTILIZING THE CIDIOT ACORN RTK NETWORK WITH CORS ID REFERENCE "JRL", KINGSTON, RI, & GEOD MODEL GEOD18.
- LIMITS OF FIELD TOPOGRAPHY SHOWN HEREON REPRESENTS INFORMATION GATHERED FROM FIELD SURVEYS CONDUCTED BY CHERENZIA & ASSOCIATES, LTD ON 05/14/24, 06/05/24, 07/17/24.
- SOURCE OF MEASUREMENT DATA IS BASED UPON CONVENTIONAL FIELD SURVEYING GNS OBSERVATIONS AND THE USE OF UNMANNED AERIAL SYSTEMS (UAS) EQUIPPED WITH A HESAI PAIDAR X132 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-00-19 OF THE RULES AND REGULATIONS ADOPTED BY THE RHODE ISLAND STATE BOARD OF REGISTRATION FOR PROFESSIONAL LAND SURVEYORS ON NOVEMBER 29, 2019, AS FOLLOWS:

TYPE OF SURVEY: MEASUREMENT SPECIFICATION:
DATA ACCUMULATION-PLANIMETRICS TOPOGRAPHY CLASS III
CLASS I-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:

PLS SIGNATURE

MARK A. CASTELLANOS PLS #2511

PRINTED PLS NAME & LICENSE NO.

LS.0004133-COA

PLAN REVISIONS			DATE	DESCRIPTION	BY	CHK
1	7-3-24	HIGH TIDE LINE WETLAND	JF	MC	MC	MC
1	7-23-24	UPDATED TOPOGRAPHY	JF	MC	MC	MC

SCALE: 1"=20'	DRAWN BY: JF
CA JOB #224031	CHECKED BY: MAC
DATE: JUNE 7, 2024	

EXISTING CONDITIONS PLAN

DATA ACCUMULATION SURVEY

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

PREPARED FOR
QUIDDESETT COUNTRY CLUB

MARK A. CASTELLANOS

Professional Land Surveyor
No. 2511
Mark A. Castellanos

SV-1





LOCATION MAP

1. THE DESIGN SHALL BE MAINTAINED AND RE-ESTABLISHED BASED ON THE HIL ESTABLISHED PER THE 2024 QUONSET TIDE GAUGE PREDICTIONS AS SHOWN ON THE ATTACHED MAPS. THE SURVEY PLAN PREPARED BY CHONDZA & ASSOCIATES, LTD. TITLED EXISTING CONDUITS PLAN, DATA COLLECTION SURVEY PREPARED FOR CONDUITEST, 2024, 01/10 DATED DATE 7/2024 REVISED JULD 23, 2024.
 2. A BOUNDARY SURVEY HAS NOT BEEN PERFORMED FOR BOTH DURING AND AFTER WORK COMPLETION.
 3. EXISTING SHORELINE VEGETATION SHALL BE PRESERVED, BUT EXISTING BEACH SOIL FROM THE IMMEDIATE ADJACENT BEACH SHALL BE USED TO RE-PRODUCED BLUFF MAY BE USED FOR BLUFF PROTECTION (REPRODUCED IT AGAINST THE SCARP (PRODUCED BLUFF FACED). EXCESS REMOVAL AND USE OF BEACH SOILS BEHIND AS FILL FROM THE PRODUCED BLUFF OR BLOW FROM OFF-SITE AREAS MAY NOT BE USED UNLESS AUTHORIZED BY CMAC.
 4. NO CONSTRUCTION DEERS INCLUDING ANY EXISTING SHORELINE PLANTS MAY BE USED TO PROTECT PRODUCED AREAS BY PLACING AGAINST THE SCARP AREAS TO BE UTILIZED.
 5. COMPACTED GRAVEL BORROW SHALL BE REPRODUCED AND VERIFIED BY A GEOTECHNICAL.
 6. VEGETATION SHALL BE CORPATED WITH A COASTAL BIOLOGIST. NATE PLANTS WILL BE SELECTED FROM REVISED AUGUST 2024 AFTER ZONE PLANNING GUIDE.
 7. EFFECTIVENESS AND/OR LASTING INTEGRITY OF THIS CONDUIT WORKS NO GUARANTEES OF THE EFFECTIVENESS AND/OR LASTING INTEGRITY OF THIS MEASURE AND BE RECONSIDERED A TEMPORARY MEASURE AND BE RECONSIDERED REPAIR AFTER TIDAL SURFACES AND/OR STORM EVENTS.
- PLAN REVISIONS:
1. SURVEY PLAN PREPARED BY CHONDZA & ASSOCIATES, LTD. TITLED EXISTING CONDUITS PLAN, DATA COLLECTION SURVEY PREPARED FOR CONDUITEST, 2024, 01/10 DATED DATE 7/2024 REVISED JULD 23, 2024.

[illegible]

SCALE: AS NOTED	DRAWN BY: ARG
CAJOB # 224031	CHECK BY: SFC
DATE: AUG. 16, 2024	

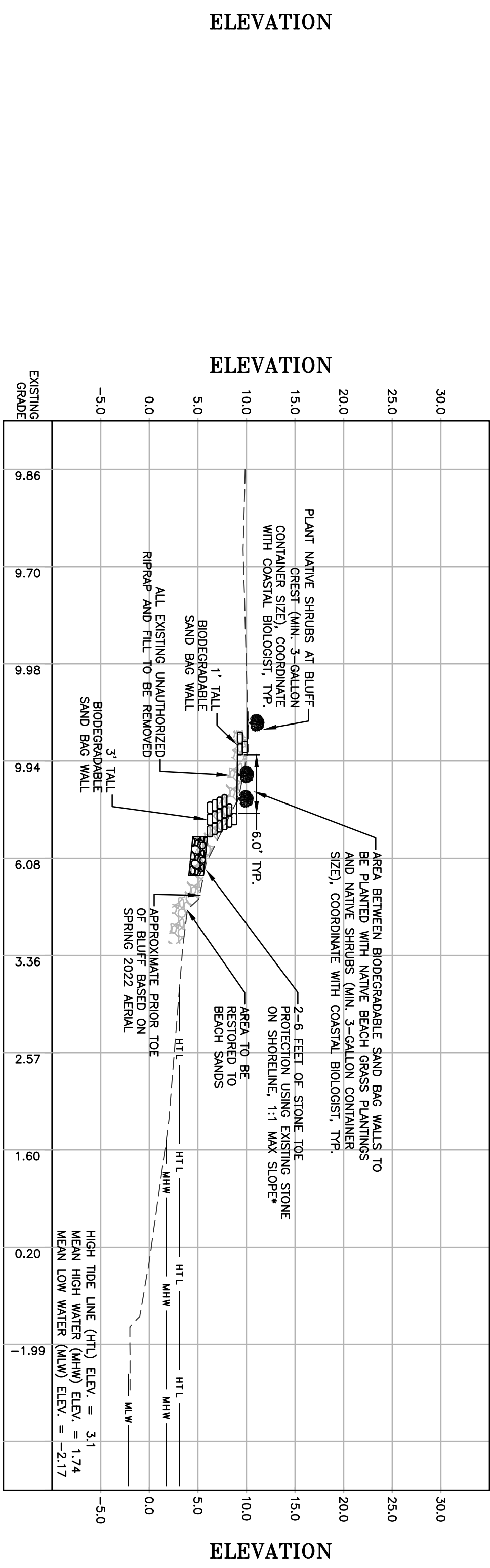
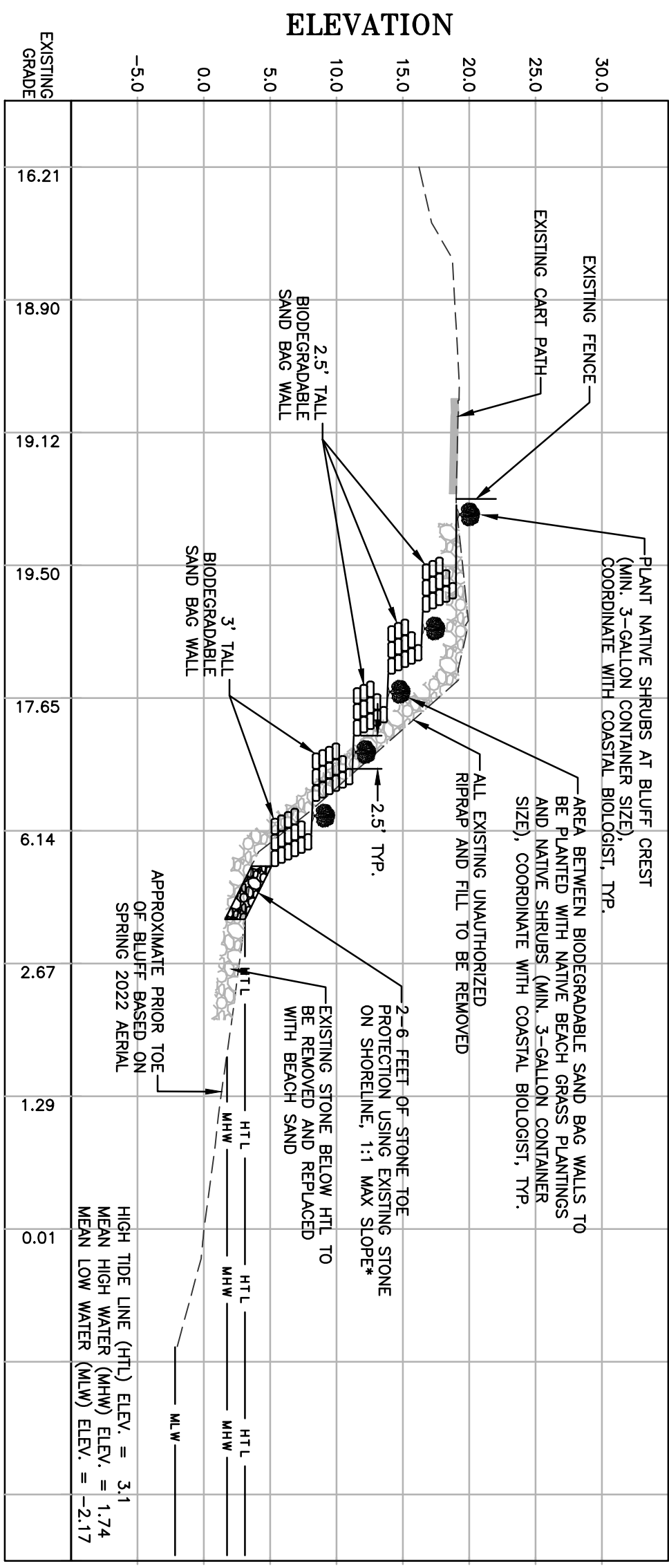
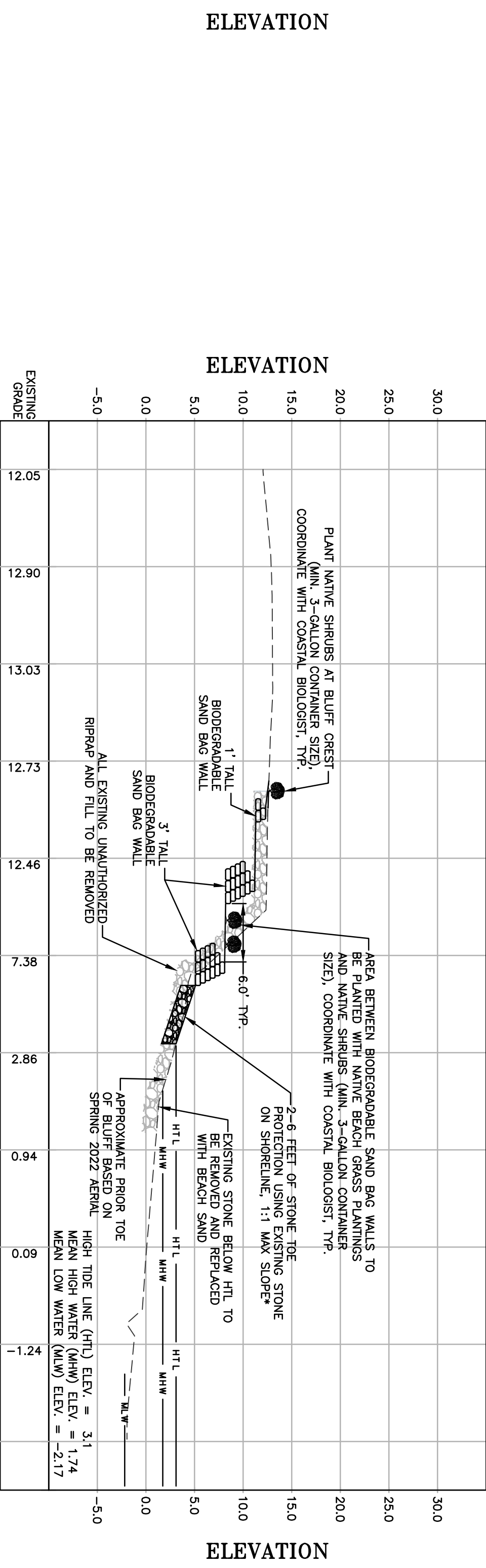
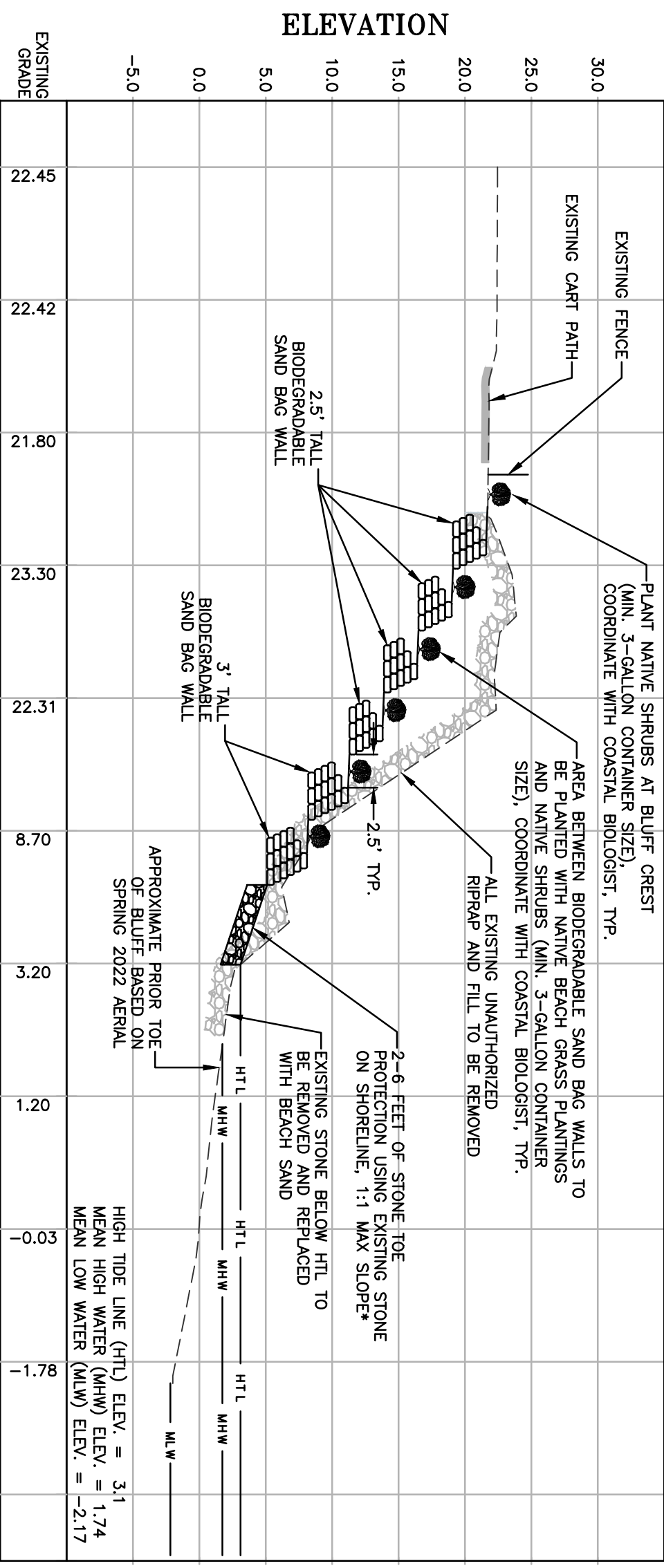
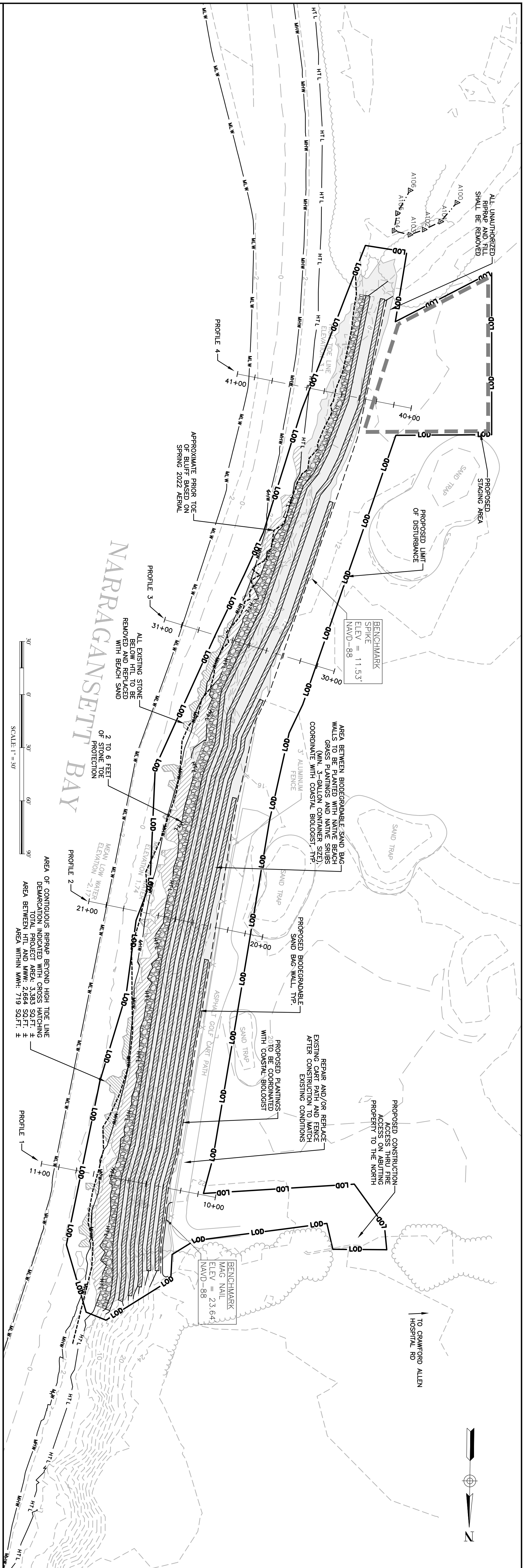
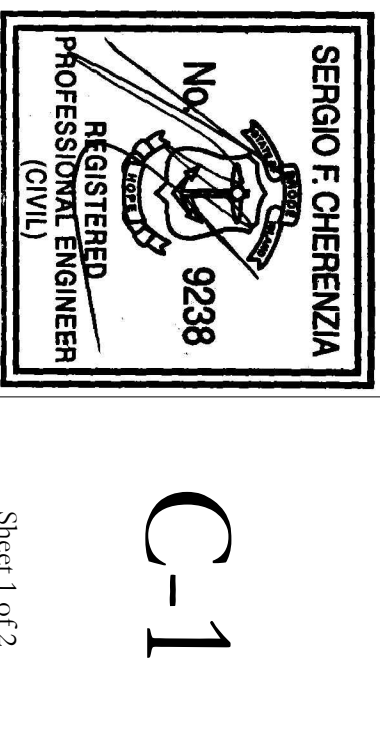
ISSUED FOR REVIEW

COASTAL RESTORATION PLAN

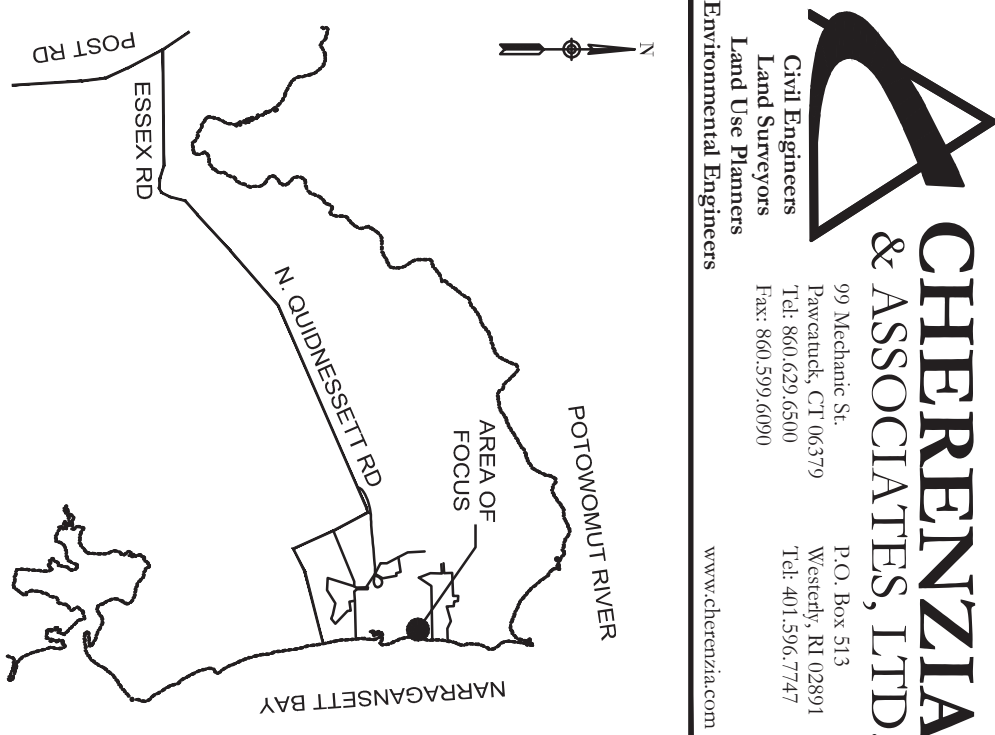
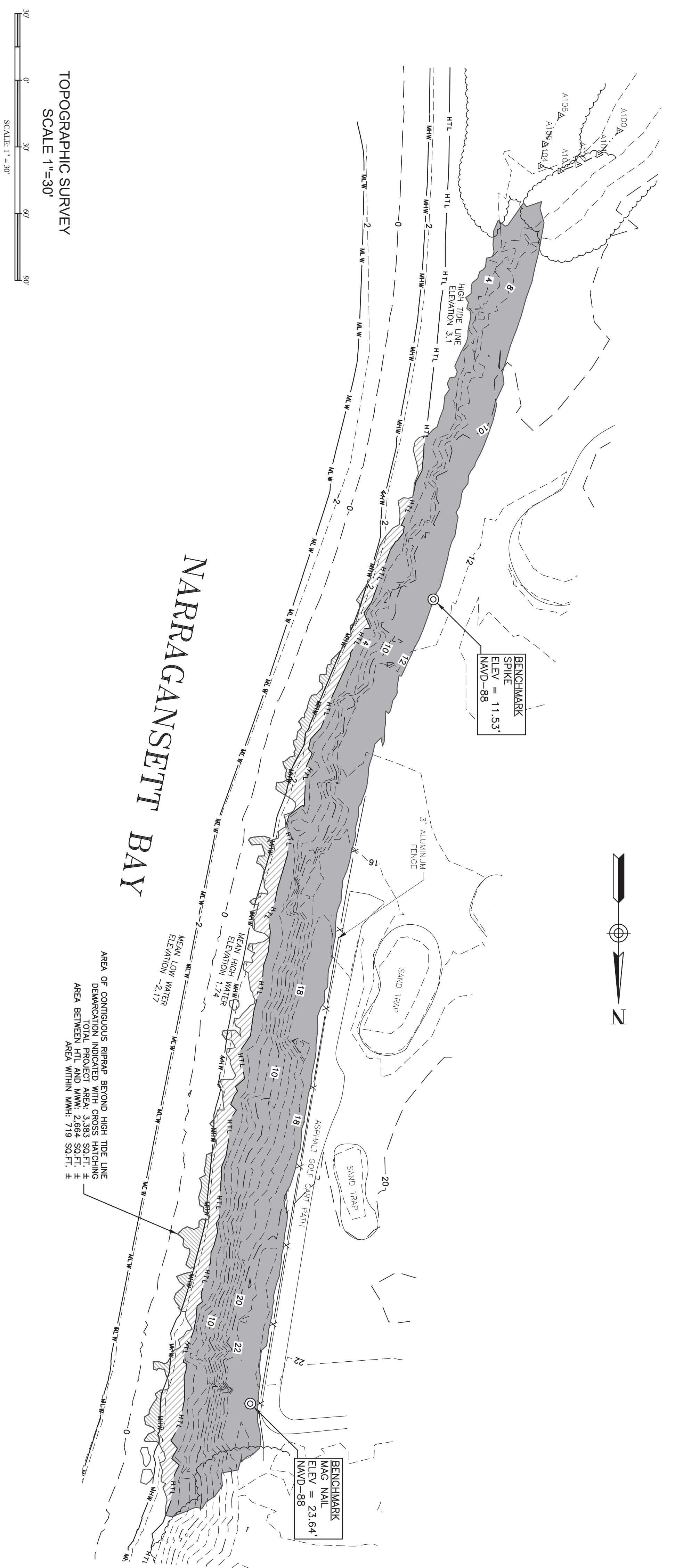
QUIDNESSETT COUNTRY CLUB

PLAT 167 LOT 2
NORTH KINGSTOWN, RHODE ISLAND

PREPARED FOR
QUIDNESSETT COUNTRY CLUB



PROFILE 2
HORIZ. SCALE: 1" = 30'
VERT. SCALE = 1" = 30'



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

SCALE: 1"=20'	DRAWN BY: JF
CA JOB #224031	CHECKED BY: MAC
DATE: JUNE 7, 2024	

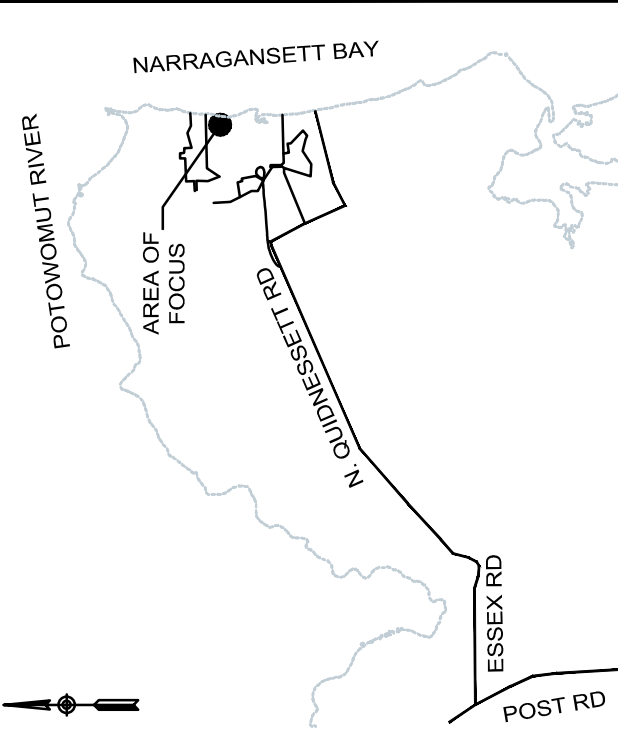
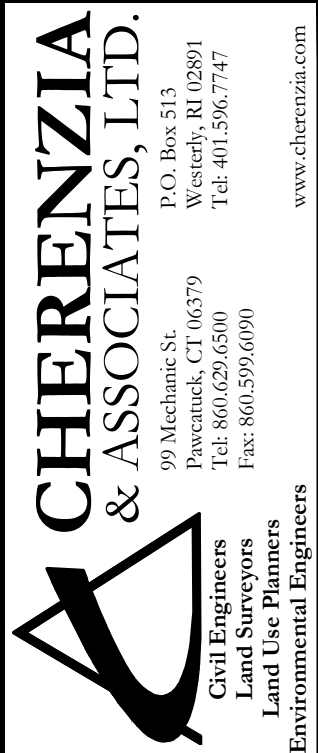
EXISTING CONDITIONS PLAN

DATA ACCUMULATION SURVEY

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

PREPARED FOR
QUINNESSETT COUNTRY CLUB

MARK A. CASTELLANOS
 No. 2511
 PROFESSIONAL
 LAND SURVEYOR
 SV-1
 SHEET 1 OF 1



LOCATION MAP

1. THE DESIGN SHALL BE MAINTAINED AND NOT CHANGED BASED ON THE HTL ESTABLISHED PER THE 2024 OCMSET TIDE GAUGE PREDICTIONS AS SHOWN ON THE AREA. THE HTL IS SHOWN ON THE STORMS MAP OF THE AREA. THE HTL IS ASSIGNED TO THE OCMSET TIDE GAUGE DATA BY THE OCMSET ASSOCIATES, LTD. LISTED EXISTING CONDITIONS PLAN, DATE ACCUMULATED SURVEY PREPARED FOR QUINDESLT, LLC.
2. A CLUB UNITE JUNE 7, 2024 REVISED JULY 23, 2024.
3. A BOUNDARY SURVEY HAS NOT BEEN PERFORMED FOR 2024.
4. EXISTING SUPRINE VEGETATION SHALL BE PRESERVED BOTH DURING AND AFTER WORK COMPLETION.
5. ONLY EXISTING BEACH STONE FROM THE IMMEDIATE VICINITY OF THE PROPOSED BLUFF MAY BE USED FOR BLUFF PROTECTION BY STACKING IT AGAINST THE SCARP (ERODED BLUFF FACED) EXCESS REMOVAL AND USE OF BEACH STONE IN THE MEAN HIGH WATER MARK IS NOT ALLOWED. STONE FROM OFF-SITE AREAS MAY NOT BE USED UNLESS NO IMPORT OR CONCRETE MAY BE USED.
6. NO CONSTRUCTION DEBRIS INCLUDING ANY EXISTING MATERIALS OR STRUCTURES SHALL BE PROTECTED ERODED AREAS BY PLACING AGAINST THE SCARP.
7. ALL BIOGRAZABLE MATERIALS SHALL BE UTILIZED.
8. BIOGRAZABLE SAND BAGS SHALL BE REEDED IN PLACE AND NOT REMOVED FROM THE SITE. THEY SHALL BE REVIEWED AND REPAIR BY A GEOTECHNICAL ENGINEER.
9. SHALL BE COORDINATED WITH A COASTAL BIOLOGIST. NATIVE PLANTS WILL BE SELECTED FROM THE OCMC COASTAL BUFFER ZONE PLANTING GUIDE.
10. CHECKLIST MARKS NO GUARANTEES OF THIS EFFECTIVENESS AND/OR LASTING INTEGRITY OF THIS NON-STRUCTURAL RESTORATION.
11. TEMPORARY MEASURE AND MAY REQUIRED REPAIR AFTER TIDAL SURGES AND/OR STORM EVENTS.

PLAN REVISIONS

REV. NO.	DATE	DESCRIPTION	DWN CHG BY	CHK BY
1	9/20/24	CRMC COMMENTS	AKG	SFC
2	10/30/24	CRMC COMMENTS	AKG	SFC

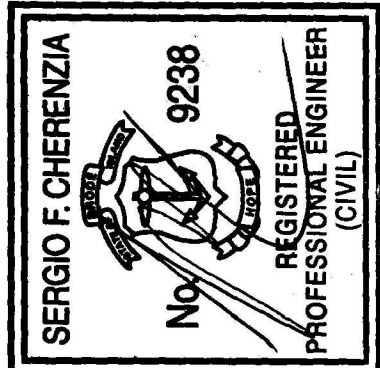
SCALE: AS NOTED
CA JOB # 224031
DATE: AUG. 16, 2024

ISSUED FOR REVIEW

COASTAL RESTORATION PLAN

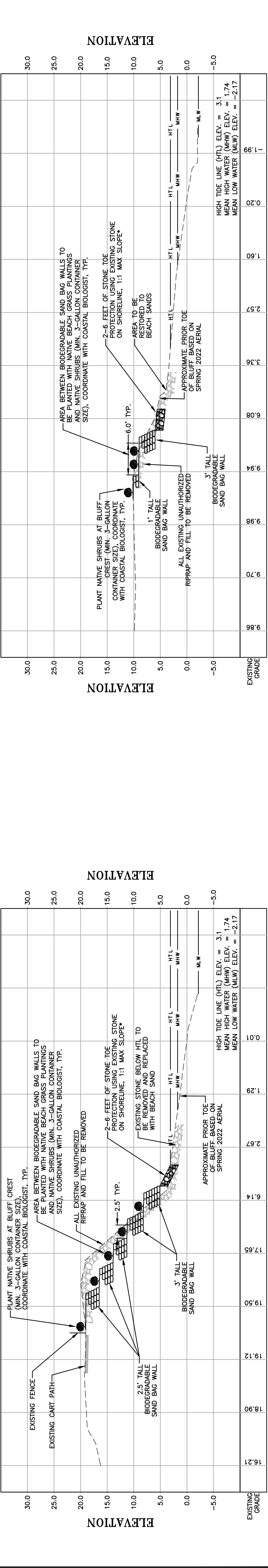
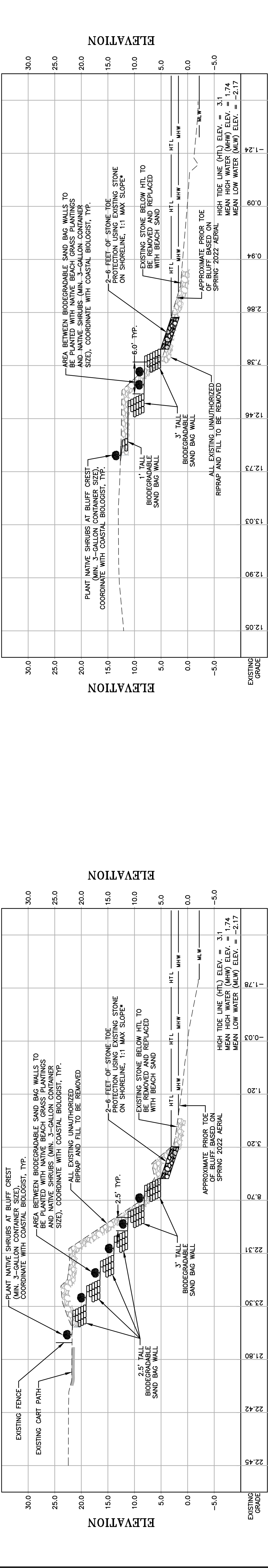
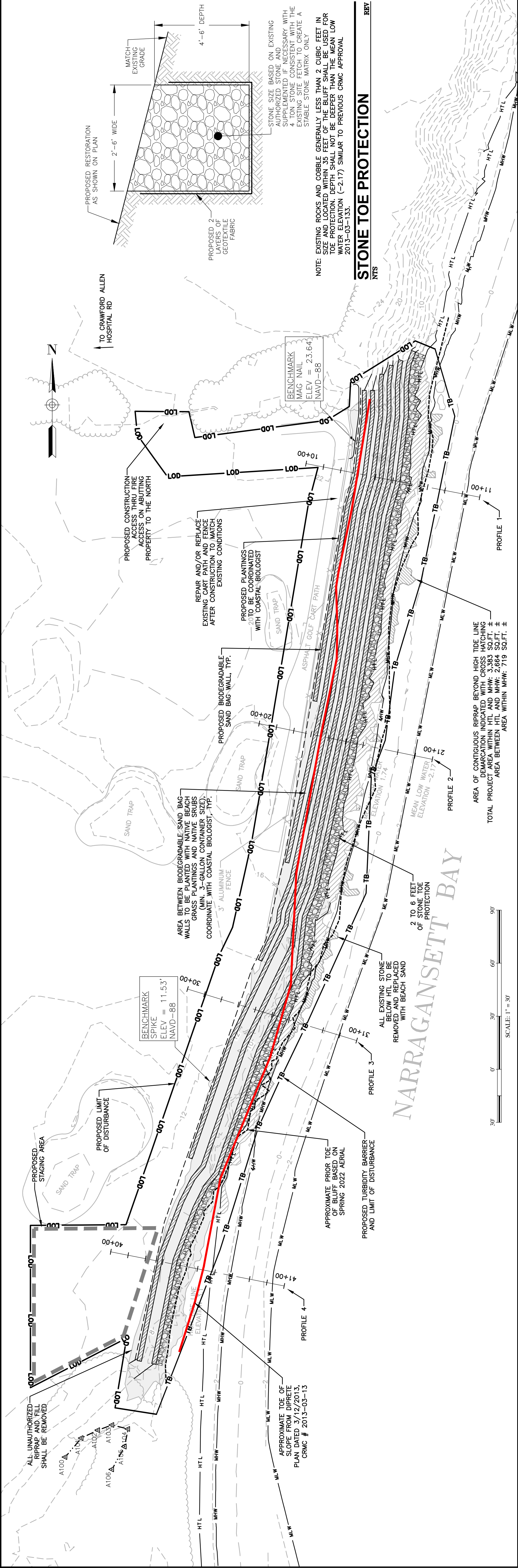
QUIDNESSETT COUNTRY CLUB
950 NORTH QUIDNESSETT ROAD
PLAT 167 LOT 2
NORTH KINGSTOWN, RHODE ISLAND


PREPARED FOR
QUIDNESSETT COUNTRY CLUB



15

Sheet 1 of 2

[illegible]



**CHERENZIA
& ASSOCIATES, LTD.**

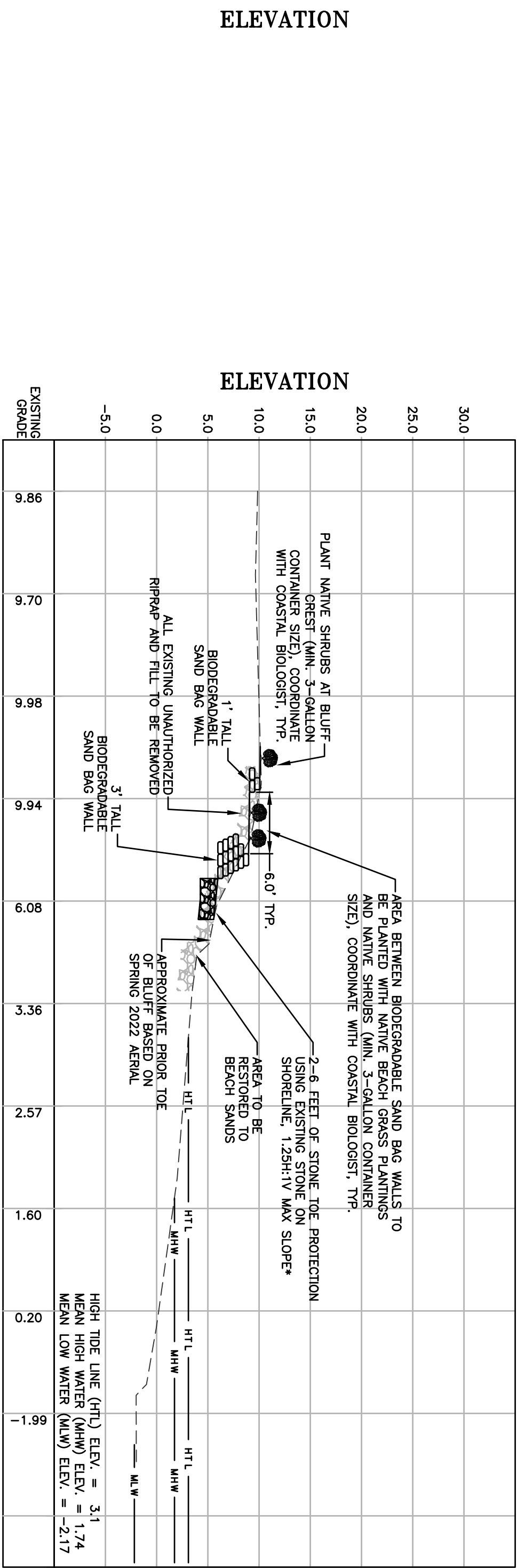
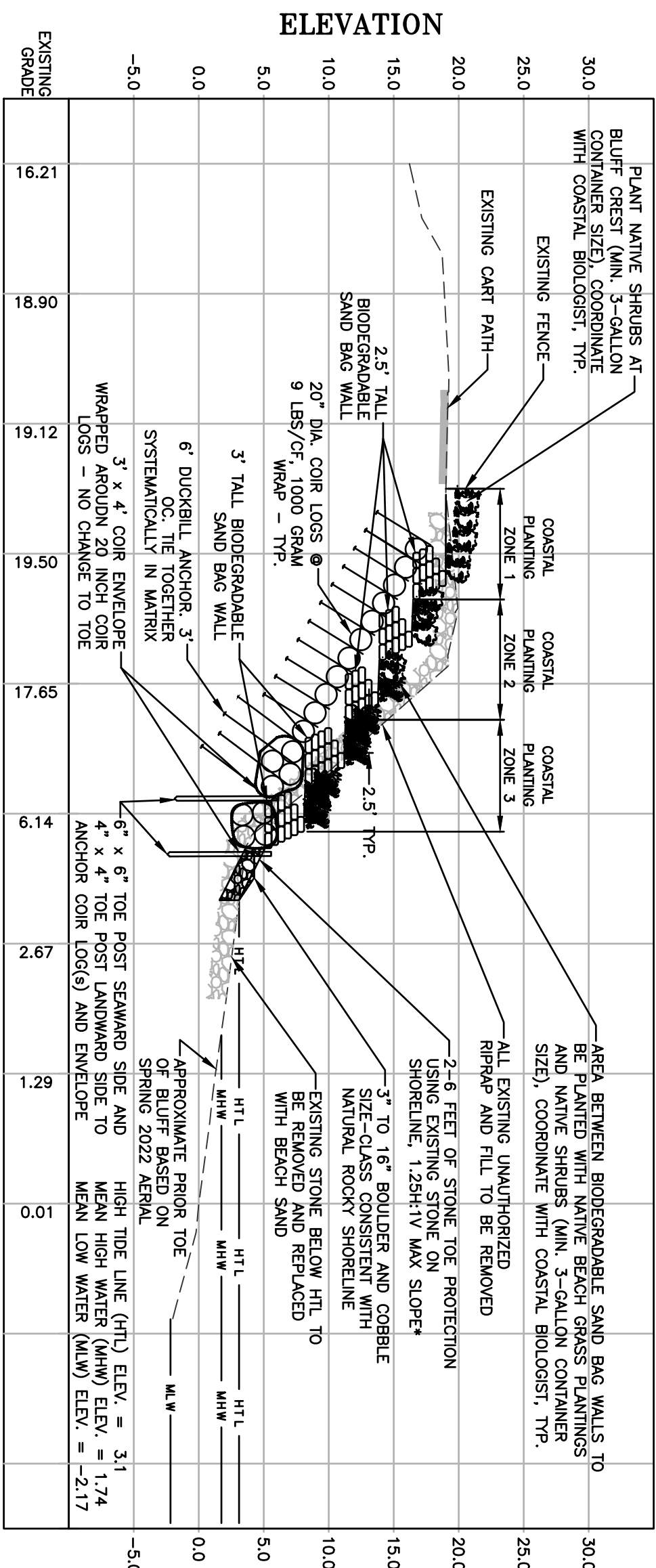
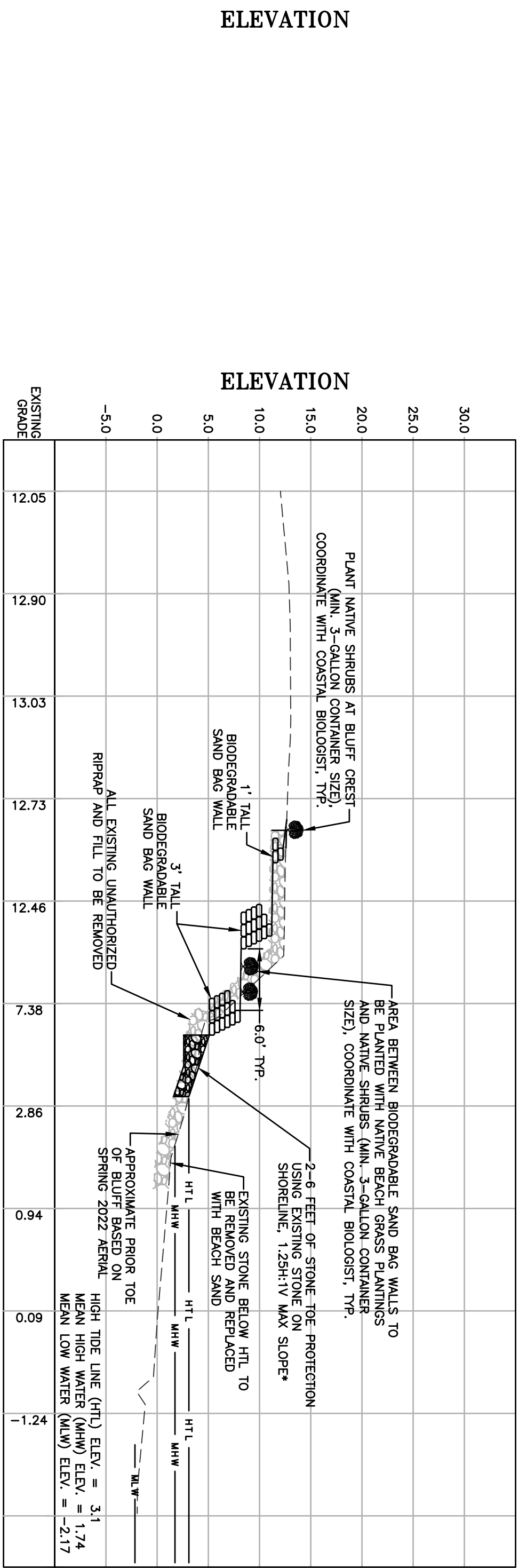
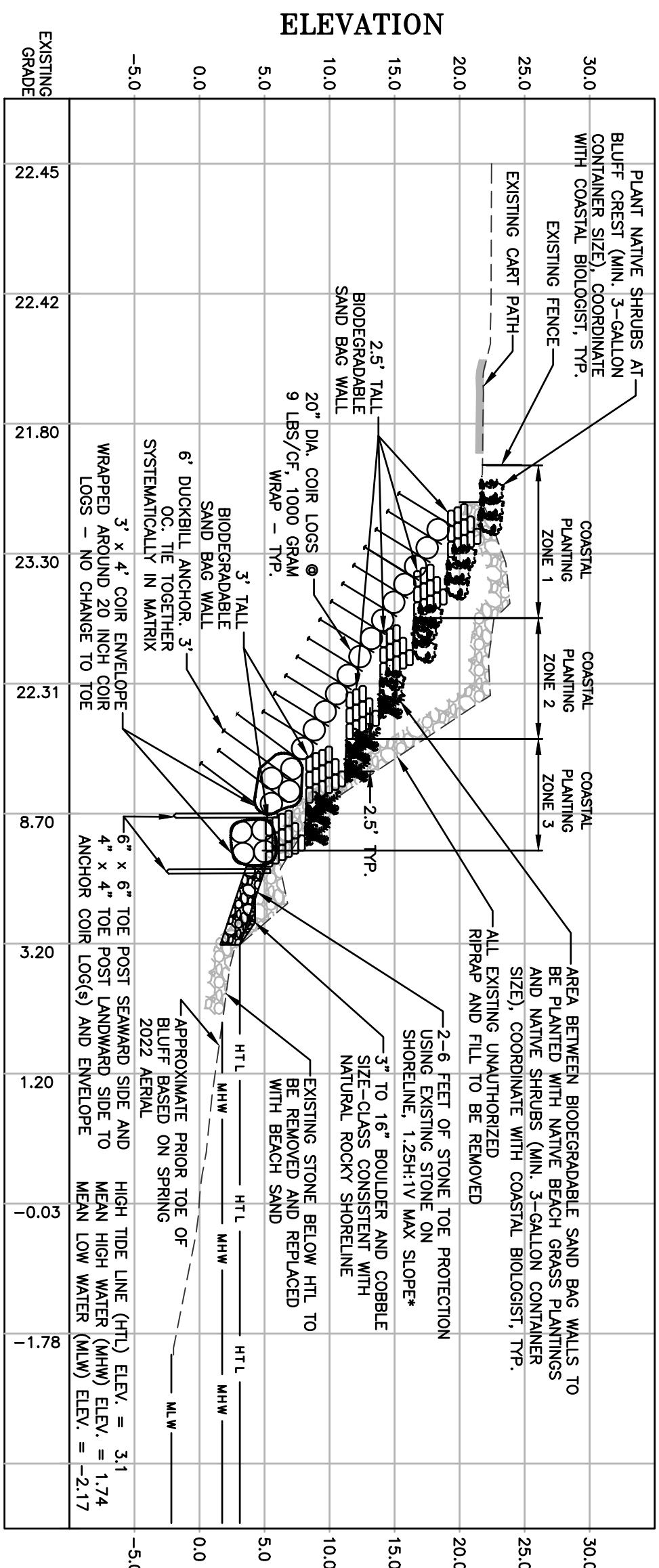
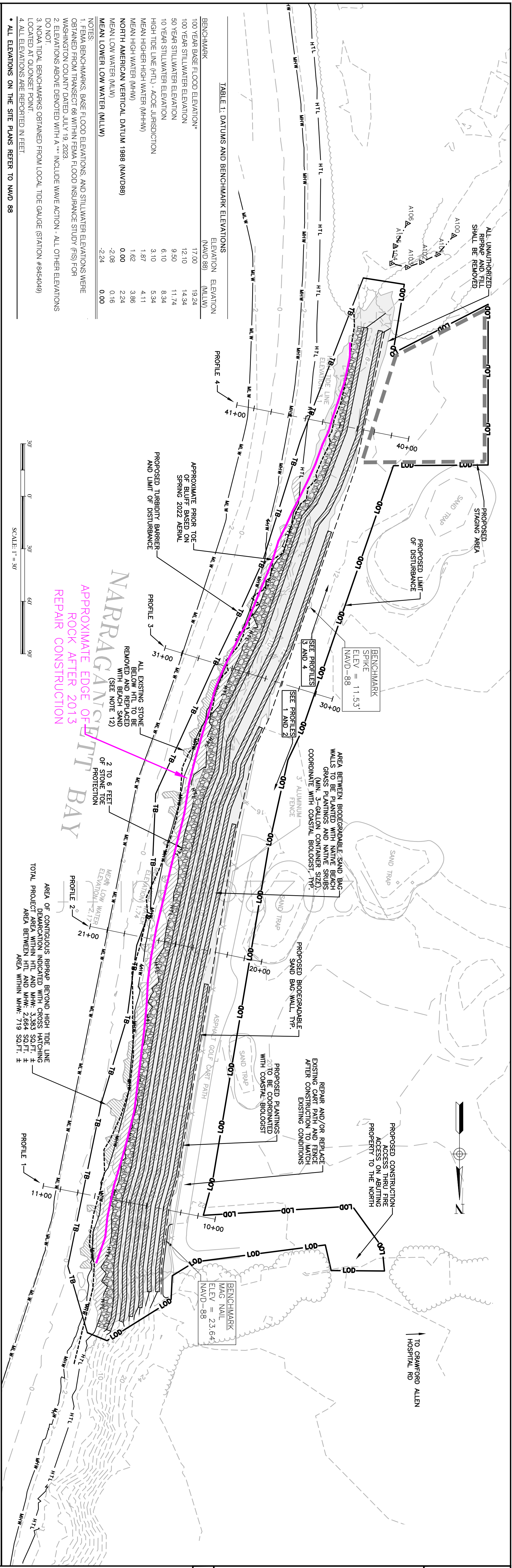
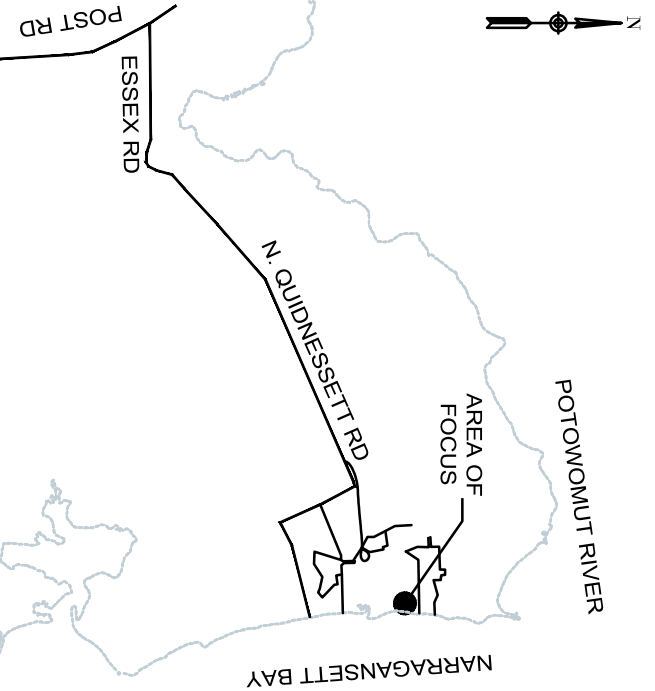
99 Machine St.
Pawcatuck, CT 06259
Tel. 861.629.6500
Fax: 861.599.6006

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

**Civil Engineers
Land Surveyors
Land Use Planners**

Environmental Engineers

www.cherenzia.com



- EXISTING ROCKS AND COBBLE GENERALLY LESS THAN 2 CUBIC FEET IN SIZE AND LOCATED WITHIN 35 FEET OF THE BLUFF SHALL BE USED FOR TOE PROTECTION. DEPTH SHALL NOT BE DEEPER THAN THE MEAN LOW WATER ELEVATION (-2.17) SIMILAR TO PREVIOUS CPMC APPROVAL 2013-03-133.

LOCATION MAP

REMOVED AND REPLACED
WITH BEACH SAND
(SEE NOTE 12)

* ALL ELEVATIONS ON THE SITE PLANS REFER TO NAVD 88

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

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

4031	CHECK BY:
16, 2024	

ISSUED FOR REVIEW

COASTAL RESTORATION PLAN

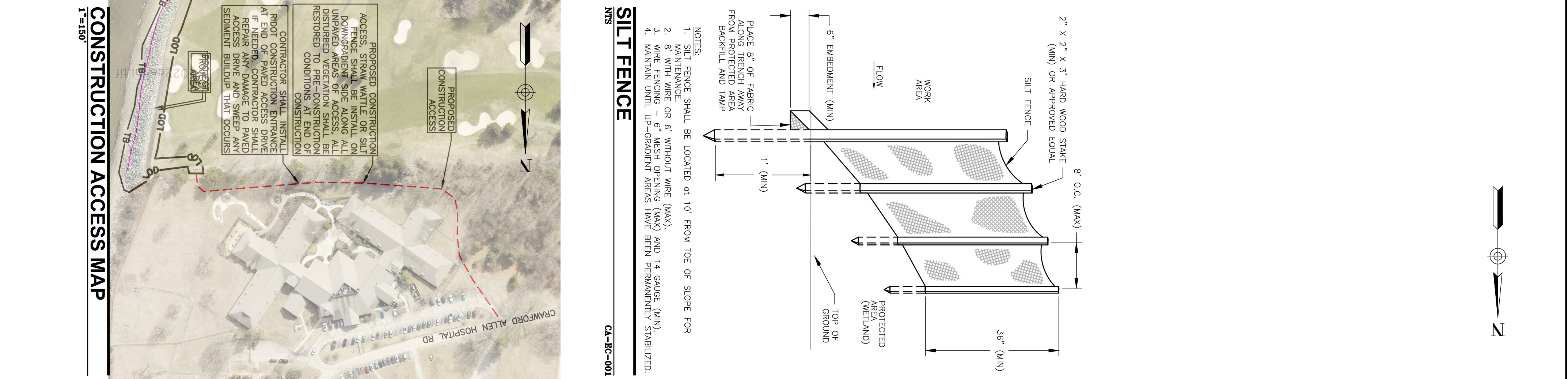
QUIDNESSETT COUNTRY CLUB
950 NORTH QUIDNESSETT ROAD
PLAT 167 LOT 2
NORTH KINGSTOWN, RHODE ISLAND

PREPARED FOR

QUIDNESSETT COUNTRY CLUB



C-1



<

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

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



PROJECT TEAM
CIVIL & GEOENVIRONMENTAL ENGINEER:



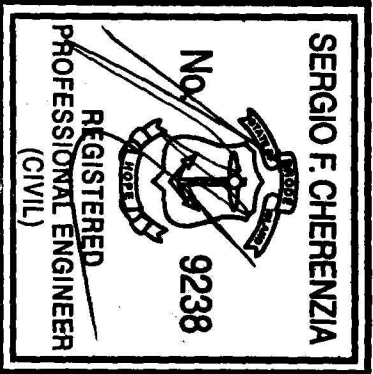
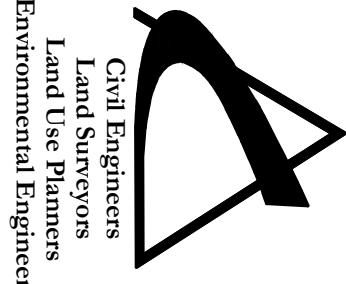
RMA ENVIRONMENTAL LLC
20 MAIN STREET
NORTH KINGSTOWN, RI 02882

ENVIRONMENTAL SCIENTIST:



ECOTONES, INC.
ENVIRONMENTAL CONSULTANTS
PO BOX 114
EAST GREENWICH, RHODE ISLAND 02818
PHONE: 401-266-5800
FAX: 401-266-5801

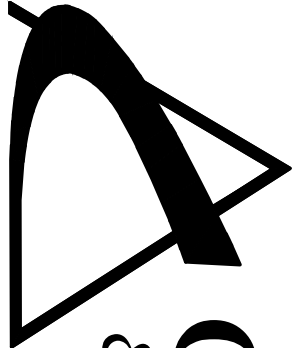
LAND SURVEYOR & CIVIL ENGINEER:



ISSUED FOR REGULATORY REVIEW
ONLY - NOT FOR CONSTRUCTION

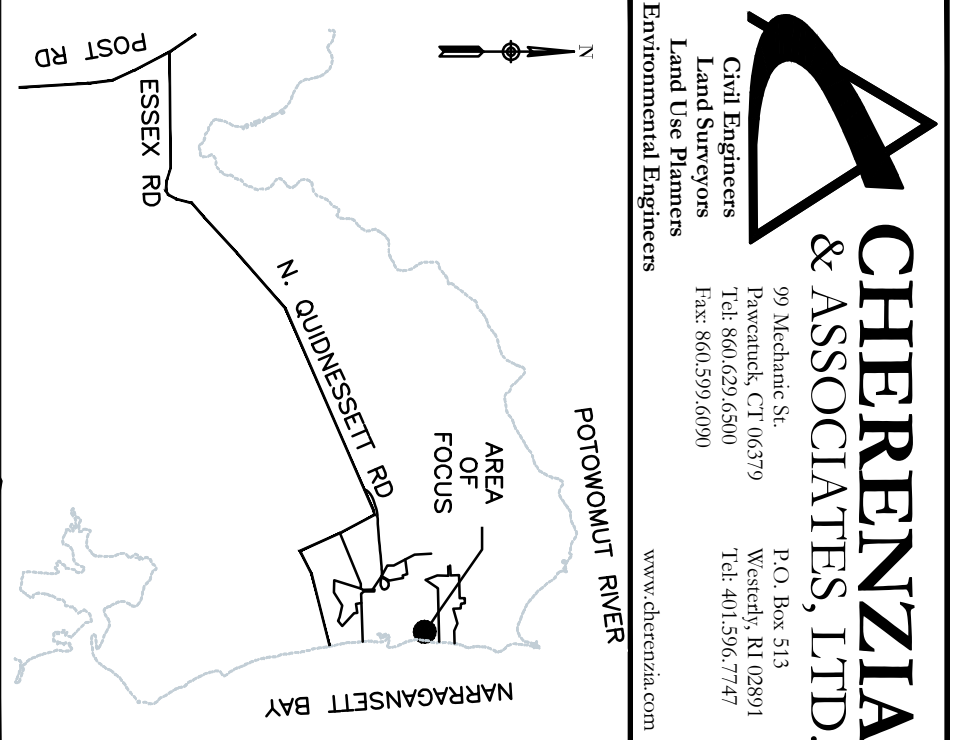
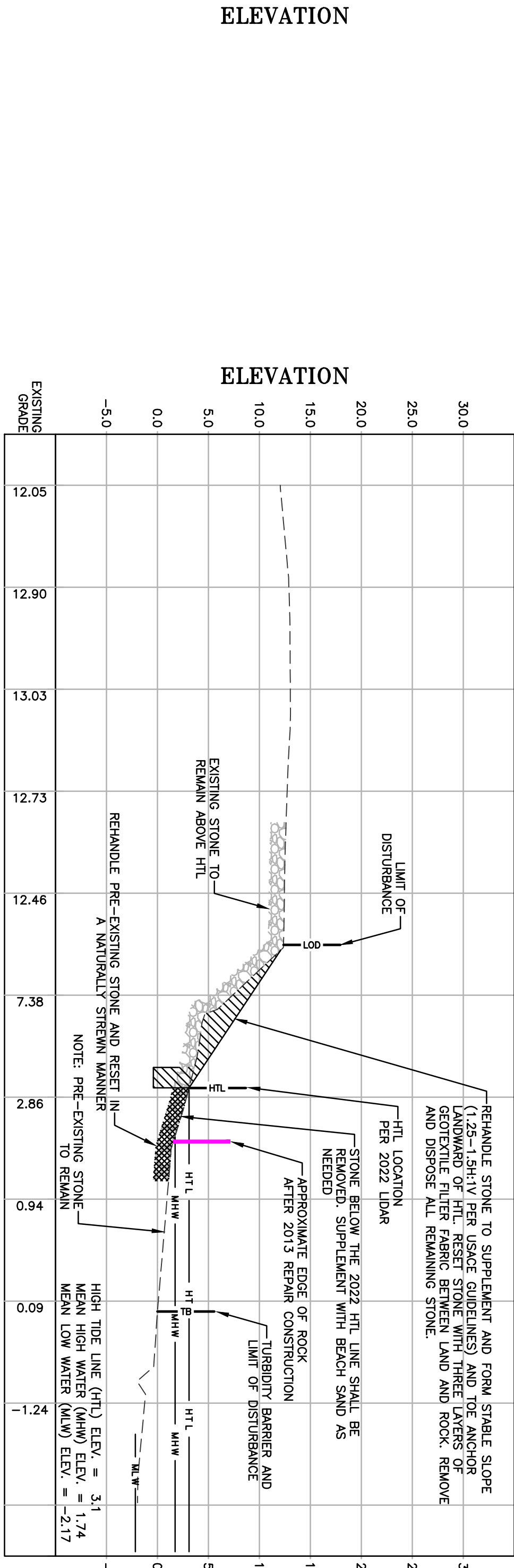
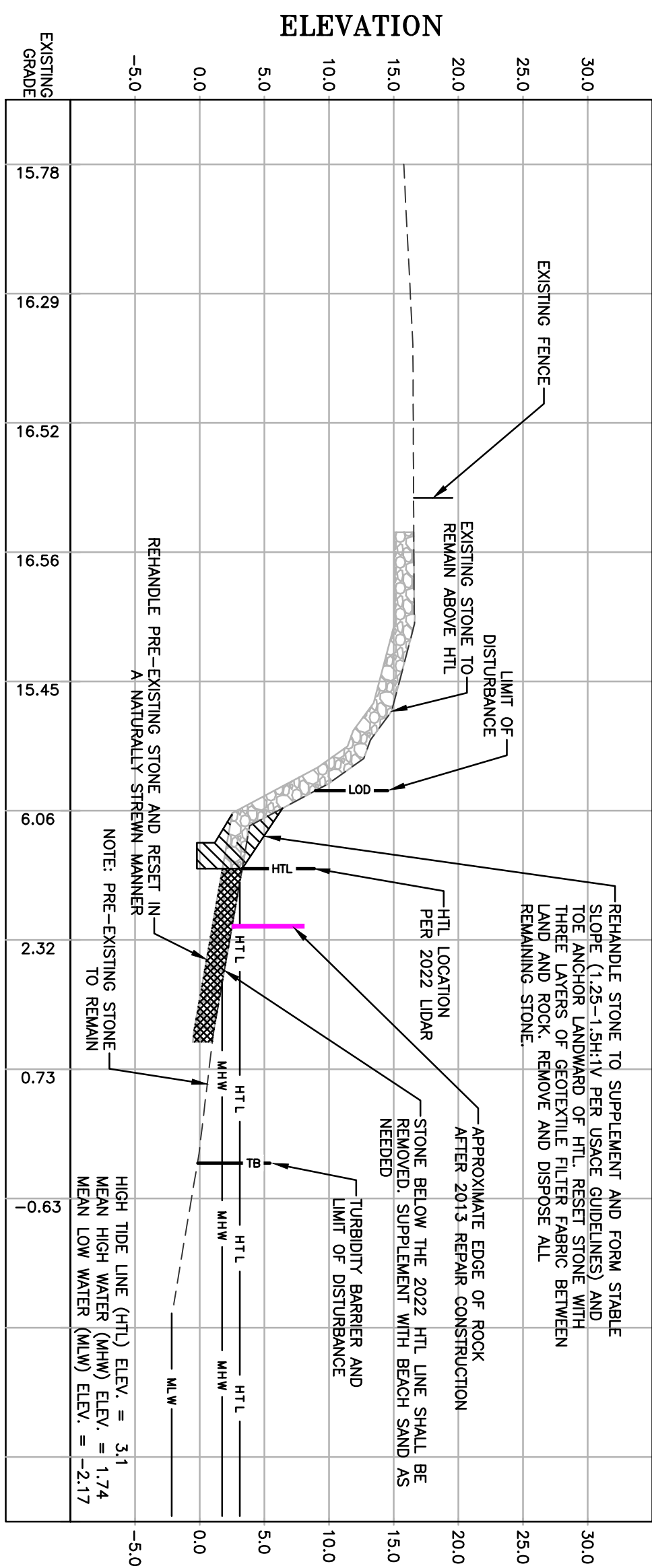
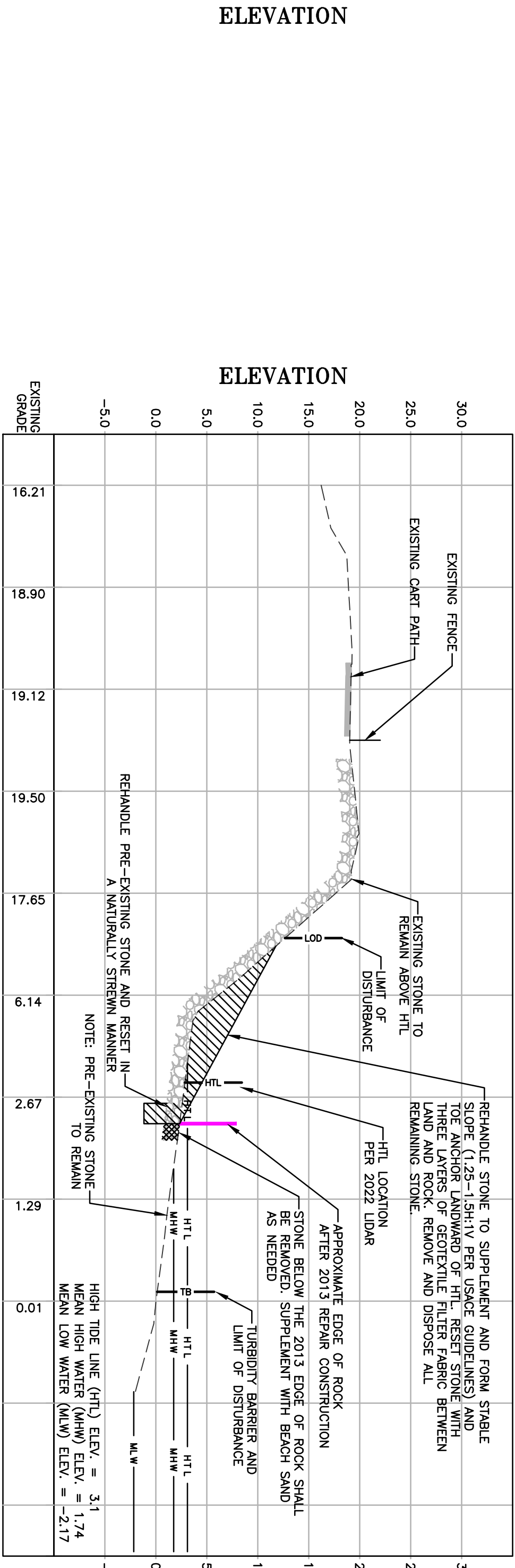
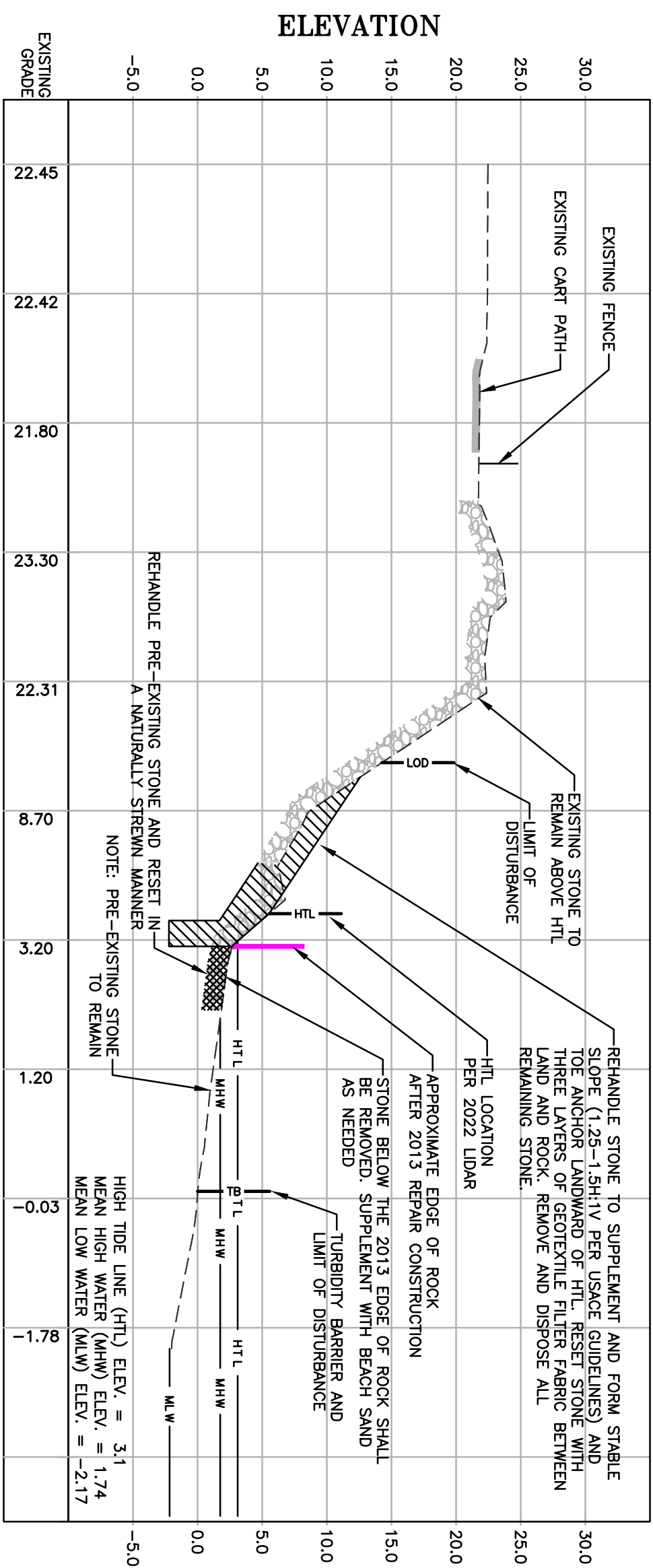
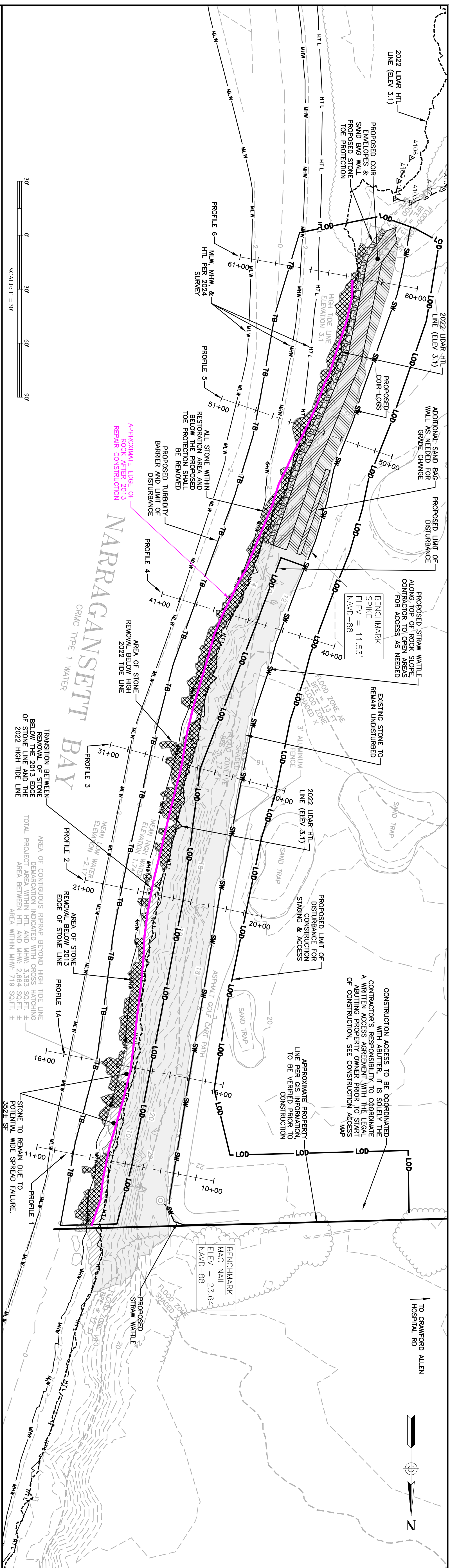
OWNER/APPLICANT
QUIDNESSETT COUNTRY CLUB INC.
PO BOX 860
EAST GREENWICH, RHODE ISLAND 02818


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



CHERENZIA
& ASSOCIATES, LTD.

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



 **CHERENZIA
& ASSOCIATES, LTD.**

99 Mechanic St.
Pawcatuck, CT 06257
Tel: 860.629.6590
Fax: 860.599.6090

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

Environmental Engineers
Land Use Planners
Soil Engineers
Water Engineers

www.cherenzia.com

Laud Océanics
Environmental Engineers
www.cherenzia.com

POTOMAC RIVER

Map of the study area showing the location of the study area within the larger context of the region.

ARR
2005

AGFA
FOCUS
Z

NSF

CHINESE.

LOCATION MAP

[illegible]

HILL JUNE (JUN. 51.1) IS COMPLETED FROM THE 2022 UDA
 EVALUATION INFORMATION. THE 2022 UDA WAS BEFORE THE
 STONE SLOPE WAS CONSTRUCTED AND THE STORMS THAT
 THE PROJECT AREA IS LOCATED IN FLEM FLOOD ZONE 6
 BE-17 FLOOD ZONE 4A WITH BE-13 FLOOD ZONE 4A
 #44000000180 WITH EFFECTIVE DATE OF OCTOBER 16, 2013.
 THE AREA OF FLOOD ZONE IS A RIVER SHELTERMAN MANAGEMENT AREA
 (HIGH BANKS MANAGEMENT AREA 9B) WITH A CORNER
 BOUNDARY. PLANT PLANTS WILL BE SELECTED FROM THE CANAL
 CULCULT. BUFFER ZONE PLANNING GUIDE REVISED ABOUT
 2000. CONFERENCE NOTES NO GUARANTEES OF THE EFFECTIVENESS
 AND/OR LASTING INTEGRITY OF THIS NON-STRUCTURAL
 RESTORATION.

LOCAL REFERENCES:
 SURVEY PLAN PREPARED BY CHENIERA & ASSOCIATES, L.T.O.
 SURVEY PREPARED BY CHENIERA & ASSOCIATES, L.T.O.
 SURVEY PREPARED BY CHENIERA & ASSOCIATES, L.T.O.
 JUNE 7, 2024 REVISION JUNE 23, 2024.
 WILLOWLAND HAS BEEN DELIVERED BY ECONOMICS INC. AND
 SPINER LOCATED.

PLAN REVISIONS

REV.	DATE	DESCRIPTION	DWN. CHG. 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

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

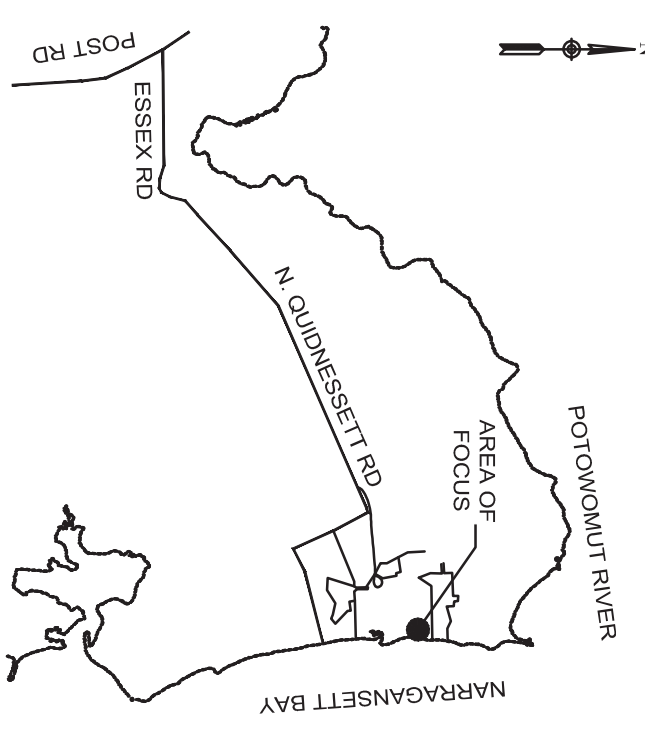
PREPARED FOR

QUIDNESSETT COUNTRY CLUB INC

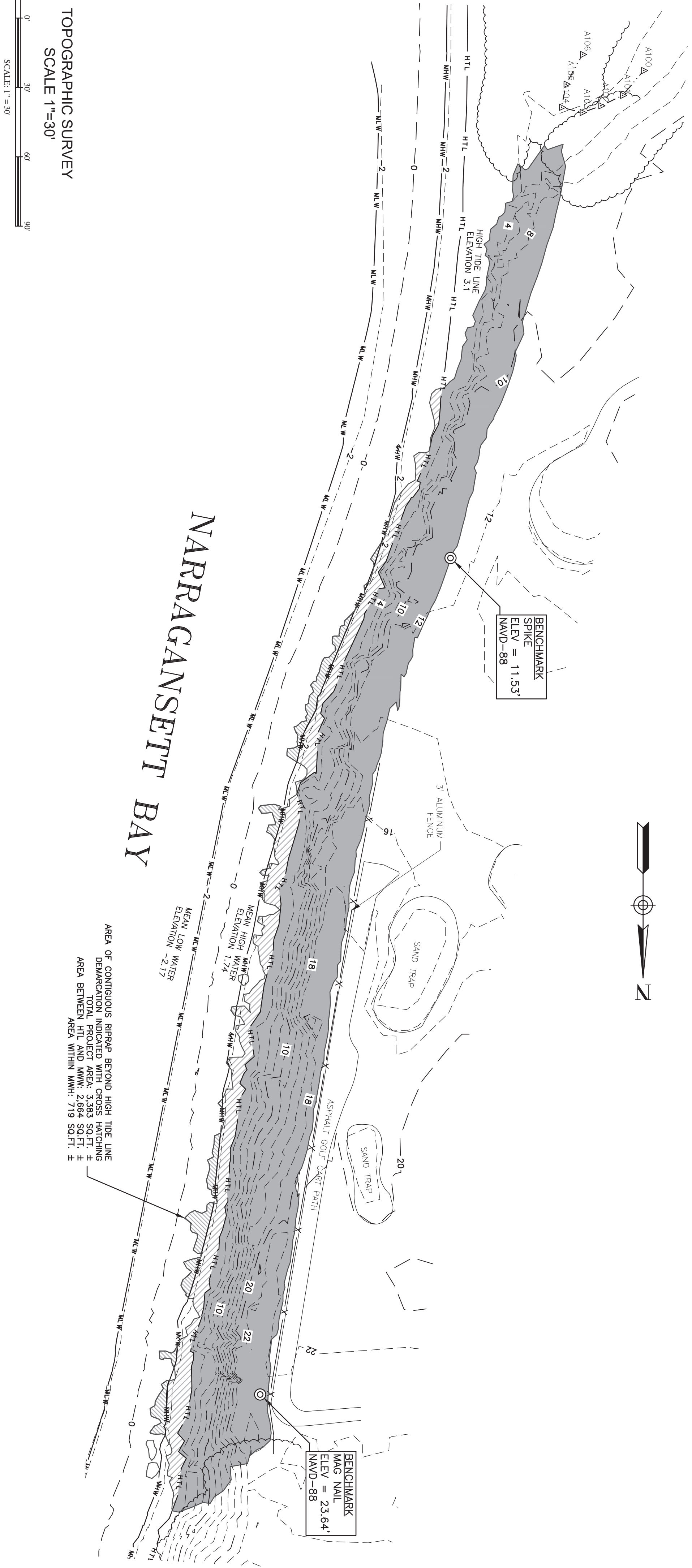
--	--

SERGIO E CHERENZIA

C-1

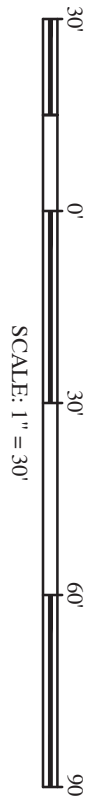


LOCATION MAP



TOPOGRAPHIC SURVEY

SCALE 1"=30'



ORTHOMOSIAC

SCALE 1"=30'

IMAGE DATE JULY 17, 2024



NOTES:

- ELEVATIONS ARE REFERENCED TO THE NORTH AMERICAN VERTICAL DATUM OF 1988 (NAVD-88). VERTICAL CONTROL DERIVED FROM GNSS OBSERVATIONS UTILIZING THE CIDIOT ACORN RTK NETWORK WITH CORS ID REFERENCE "JRL", KINGSTON, RI, & GEOD MODEL GEOD18.
- 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 GNS OBSERVATIONS AND THE USE OF UNMANNED AERIAL SYSTEMS (UAS) EQUIPPED WITH A HESAI PAIDAR X132 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-00-19 OF THE RULES AND REGULATIONS ADOPTED BY THE RHODE ISLAND STATE BOARD OF PROFESSIONAL LAND SURVEYORS ON NOVEMBER 29, 2019, AS FOLLOWS:

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

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:

PLS SIGNATURE

MARK A. CASTELLANOS PLS #2511

PRINTED PLS NAME & LICENSE NO.

LS.0004133-COA

PLAN REVISIONS				DATE	DESCRIPTION	BY	CHK
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

PLS SIGNATURE
MARK A. CASTELLANOS PLS #2511
PRINTED PLS NAME & LICENSE NO.
LS.0004133-COA

SV-1