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**DELIVERED VIA EMAIL**

November 25, 2024

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

Dear Members of the Council,

Last week, the Council canceled yet another hearing on Quidnessett Country Club's illegally constructed 600-foot seawall, built without a permit, and in blatant disregard of state and federal laws. As the regulatory body whose job is to enforce the rules that protect Rhode Island's coast, the Council appears to be engaged in the well-known tactic of delay, which benefits a violator in attempting to circumvent those rules. The Council's actions on Quidnessett smack of political favoritism and abuse of power.

By allowing Quidnessett's illegal wall to remain for over 450 days, the Council is undermining the CRMC staff's enforcement order to remove the wall and restore the shoreline that is now buried and inaccessible. By delaying action on the enforcement order, while continuing to conduct inappropriate hearings aimed at letting the illegal wall stand, the Council is complicit in Quidnessett's attempts to downgrade state protection of adjacent Narragansett Bay waters through a blatantly illegal action. The Council must support the staff's enforcement order for immediate restoration of the site before considering the weakening of protections of the shoreline and adjacent waters.

The Council's months-long series of delays gives the country club an unfair economic advantage over law-abiding coastal landowners and businesses who spend money and time applying for permits to comply with the law. The Council is opening the door for more violations and sending the message that it is better to ask for forgiveness than permission. Additionally, the Council's lack of consistency and fairness undermines the integrity of Rhode Island's coastal governance, the protection of our coastal ecosystems and the public's ability to access the shore.

The Council's apparent willingness to accommodate a politically connected violator of the law deepens the public's distrust of this politically appointed body and shows the Council's disregard for fairness and transparency. Despite being recently cautioned by the Rhode Island Supreme Court that effective coastal management depends on the Council engaging in "open and traceable decision-making processes," the Council's repeated cancellation of Quidnessett's hearings is not transparent or fair.

The maxim "justice delayed is justice denied" holds true for Rhode Island's fragile coastal ecosystems and the citizens that expect and depend on fair and uniform protection of our coastal resources. Justice for our shared coastal resources is not only denied by these delays, but is also thwarted by the very government agency – CRMC – that is required to uphold our coastal laws.

Quidnessett's delay tactics are plainly designed to avoid legal consequences for its unlawful actions. Considering a water type downgrade, while allowing this illegally-built wall to remain standing, risks "potential negative impacts to coastal habitat, shoreline access and marine resources," according to CRMC's professional staff of coastal experts.

The Council must immediately cease providing a blatant violator with repeated delays and opportunities to circumvent CRMC's own regulatory process and require the removal of the illegally-built wall. The Council must meet its obligation to the citizens of this state to protect, preserve and restore our state's coastal resources, rather than playing politics with a well-resourced violator who thinks they are above the law.

Sincerely,



Topher Hamblett  
Executive Director

Cc: Jeffrey Willis, Executive Director, RI Coastal Resources Management Council  
Terrence Gray, Director, RI Department of Environmental Management  
The Honorable Daniel J. McKee, Governor  
The Honorable Peter Neronha, Attorney General  
The Honorable Dominick J. Ruggerio, Senate President  
The Honorable K. Joseph Shekarchi, Speaker of the House  
Kevin R. Kotelly, P.E. Chief, RI/CT Section Regulatory Division, U.S. Army Corps of Engineers  
Michael Migliori, Program Manager, Evaluation and Environmental Compliance Office for Coastal Management, National Oceanic and Atmospheric Administration