

Sent via electronic mail to: cstaff1@crmc.ri.gov

October 8, 2025

Jeffery Willis, Executive Director
Rhode Island Coastal Resources Management Council
Stedman Government Center
4808 Tower Hill Road
Wakefield, RI 02879



Re: CRMC File No.: 2023-10-015, City of East Providence

Dear Director Willis,

Save The Bay, on behalf of our members and supporters, is pleased to submit comments pertaining to CRMC File Number 2023-10-015, the revised plans for the proposed City of East Providence's work at Crescent Park and Sabin Point. Save The Bay has been involved in the review process for this project since 2023, meeting with the City and CRMC to discuss changes to the proposed plans to reduce this project's impacts on public access, sandy beach habitat, and associated wildlife. While we still have reservations regarding the scope of removal and regrading of the shoreline feature and the extent of new hardened shoreline being created, we recognize that some of our other previous requests have been addressed. Regarding the plans currently proposed, we offer the following comments to mitigate potential environmental harms and increase resiliency.

First, in the area of work at Crescent Park proposed for native shrub planting, Save The Bay recommends the exclusion of the 6" loam layer proposed as the final top layer of the regraded bank, the inclusion of native warm season grass plugs, like switchgrass (*Panicum virgatum*) to the planting plan, and the inclusion of a specific hydroseed mix of cool and native warm season grass species.

The native maritime shrubs proposed for planting of the regraded bank are well-adapted to the more sandy, nutrient-poor soil along the coast, requiring no soil amendments. Therefore, the inclusion of nutrient-rich loam as a top layer for the regraded bank would likely only increase the establishment of undesired invasive and non-native species at this location, outcompeting the native species. Additionally, loam is oftentimes itself contaminated with weed and invasive plant seeds, potentially seeding the area with this undesirable vegetation immediately upon completion of the project.

Along with the exclusion of loam, Save The Bay recommends the inclusion of native warm season grass plugs, like switchgrass (*Panicum virgatum*), to the planting plan, in addition to clarification that the hydroseed

mix proposed specifically be a mix of cool and native warm season grass species. Native warm season grasses have extensive root systems which would help to stabilize the regraded bank, and provide cover as an early protection against the establishment of non-native vegetation in the areas between the native shrubs planted.

Second, in the area of Sabin Point east of the existing stormwater outfalls proposed for berm creation, Save The Bay recommends the removal of the approximately 90 ft of rock wall prior to sediment placement and berm creation.

Save The Bay recognizes that the revised plans now include the use of some of the 30,000 cubic yards of material excavated during regrading for berm creation at Sabin Point and Crescent Park, and stockpiling the remaining material off-site to be used later for beach renourishment at Crescent Park beach over the course of the following decade. Allowing this sediment to remain in the system over the short- and long-term will prove beneficial for habitat health and public access. However, we recommend an alteration to the work, as it pertains to this sediment placement and berm creation at Sabin Point.

Save The Bay recommends, prior to sediment placement for the berm creation east of the existing stormwater outfalls at Sabin Point, the removal of approximately 90ft of the existing sloped rock wall on top of which the berm is proposed to be created. If left remaining beneath the newly created berm, this rock wall could prevent deeper growth of vegetative roots, become exposed following future coastal storm events and associated erosion, reduce beach area for the public's use, and, once exposed, potentially exacerbate erosion under future sea level rise scenarios once exposed. The removal of the wall would allow for the creation of a more natural shoreline to tie into the existing dune area to the east of the current wall, creating increased resiliency to future storm events.

Thank you for the inclusion of these comments into the permit file and your consideration of our recommendations.

Sincerely,



Capt. Chris Dodge
Narragansett Baykeeper - Save The Bay
100 Save the Bay Dr.
Providence, RI 02905
(401) 272-3540 x116
cdodge@savebay.org



Brittany Spurlock

From: Dave Murray <dwmurray22@gmail.com>
Sent: Monday, August 4, 2025 12:43 PM
To: Cstaff; Emily Hall
Subject: Application 2023-10-015

I have been following the progress of Application 2023-10-015 submitted by the City of East Providence concerning slope stabilization along the southern shoreline at Crescent Park Beach. I attended some earlier meetings held by the City regarding Crescent Park and voiced concerns about the initial plans. I have also expressed these concerns to STB staff, as well as Emily Hall after one of our STB Program and Policy meetings.

I see that revised plans were submitted in May and am wondering if it is possible to get a copy. Will there be any further options for public comment?

My concerns:

The prior plans included some substantial modification of the slope and vegetation. In my opinion this will cause more alteration in one project than would occur in decades of natural erosion. There were two forms of erosion abatement put in several years ago and the one with coir logs has actually worked. I was present when it was installed and spoke with prior CRMC staff member, Janet Friedman, about it. Of course there has been enhanced erosion on the edges, especially on the north side, but that is expected with a "hardened" shoreline as noted in other areas of the Bay. I have put forth a plea to have this type of erosion control extended to the north and south. This would protect the slope with minimal destruction of existing vegetation at the top of the slope or alteration of the existing beach area.

I've lived on Narragansett Terrace since 1996 and am a regular (daily) dog walker through the park. The beach area in front of the prior project on the north side of the park is starved of sand- exposing rocks that have been buried for years. The base of the stairs to the beach on either side of the seawall are routinely underwater during normal high tides. In my opinion, any extension of this type of hardened shoreline will be detrimental to the beach flora and fauna - including horseshoe crabs, as well as the wildlife that inhabit the vegetated wooded area at top of the slope.

I realize that this is a type 2 water and a hardened shoreline is permitted, but just because it's allowed, does not mean other less invasive options should not be considered.

Thanks in advance for any information on the revised plans and considering my comments.

Sincerely,
David W. Murray
44 Riverside Dr
Riverside, RI 02915

I am not a coastal engineer but do have a background/knowledge in Geology and coastal processes:
BS - Geology URI 1978- Jon Boothroyd advisor on Sr Project of erosion at Charlestown Beach (including blizzard of '78)
MS & PhD - Geological Oceanography, Oregon State University 1983&1987

Recently retired from Brown University after 35 years in Environmental Studies and Geological Sciences.

Cstaff1

From: Deborah Renaud <nurserenaud@yahoo.com>
Sent: Tuesday, December 10, 2024 9:42 AM
To: CSTAFF1@CRMC.RI.GOV
Subject: Crescent Park

File No: 2023-10-015

Hi,
My name is Deborah Renaud and I live at 37 Terrace Avenue, Riverside R.I. I , (plus children Robert and Rebekah Rodericks) own the property that abutts the Crescent Park shoreline that is seeking to construct a shoreline protection system along the park's southern end.
I am requesting to have the plans sent to me by e-mail. Thank you.

P.S. I received a notice by mail *yesterday* that the meeting at Capitol Hill *today* was cancelled. When it is rescheduled, could you possibly call me as well as mail, because it took 6 days to get here and next time it will probably be longer with x-mas mail. Again, thank you for your time.
My phone # 401 433-2223 (landline)

December 6, 2024

Coastal Resources Management Council
4808 Tower Hill Rd # 116
Wakefield, RI 02879

Re: Support from The Nature Conservancy on East Providence's Crescent Park Application

Dear Members of the Coastal Resources Management Council,

The Rhode Island Chapter of The Nature Conservancy is in full support of the City of East Providence's coastal bluff restoration efforts at Crescent Park. The Nature Conservancy has offered to work as a partner with the city, as we are going to be able to leverage Congressionally Directed Spending (CDS) available to us from Senator Whitehouse's efforts. The TNC funding will support the design and construction of a vegetated slope above the proposed stone revetment to stabilize the bluff and control erosion using Nature Based Strategies, which builds on the work that the city plans to engage in.

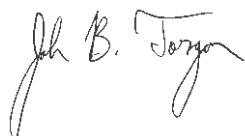
The Crescent Park project offers multiple co-benefits. These include protecting the public's long-term enjoyment of Crescent Park and beach, limiting harmful erosion into the bay, and creating valuable shrubland habitat which has been disappearing from our coastal regions.

This important coastal shrubland habitat in the state of Rhode Island is declining, due to habitat succession and shoreline development for industry, recreation, and housing. Native shrub patches comprised of bayberry, arrowwood, winterberry, and elderberry are important for declining migratory songbirds in the spring and fall as a stopover site. In general, these sites do not have to be large, just located in the right location and having good habitat composition. This would be a unique opportunity to create a bird friendly habitat that would serve as an oasis in an otherwise built environment.

This will be a case study to evaluate the success of using vegetative slopes, (applying a dense growth of low growing plants and shrubs) to contribute to stabilize eroding coastal shorelines. It will inform public and private landowners across coastal Rhode Island. This work will help demonstrate the option to use nature-based solutions, instead of hardscape to protect and control eroding coastal properties – which will be increasingly important as we continue to experience the impacts of climate change on our coast.

Thank you for your time and attention to this issue. Please reach out if you have any questions or if we can be helpful in any way.

Sincerely,



John B. Torgan, State Director
The Nature Conservancy, Rhode Island





Fairbanks Engineering Corporation
Geotechnical & Marine Engineers

December 5, 2024

Mr. Richard Lucia, P.E. (via email: rlucia@crmc.ri.gov)
CRMC
Oliver Stedman Government Center
4808 Tower Hill Road
Wakefield, RI 02879

Re: Response to Save the Bay Letter dated 11-27-24
City of East Providence Slope Stabilization Project
CRMC File #2023-10-015
East Providence, RI
FEC Project No. 21005.00

Dear Mr. Lucia:

Fairbanks Engineering Corporation (FEC) with assistance from FR Engineering Group (FREG) has reviewed the comments in the letter dated November 27, 2024 from Save the Bay (SB) and provides responses below. We are surprised by some of the comments raised given discussions and agreements reached regarding the project scope during several stakeholder meetings onsite that were attended by SB. However we note the person that prepared the SB letter was not at these meetings, which may be a reason for the misunderstanding. Extended discussions over the course of these stakeholder meetings are the basis for the proposed approach and the preparation of the current CRMC special exception application.

Crescent Park (formerly Rose Larisa Park) is a public park that is used by many people each day. The existing slope is unstable, and anything less than stabilizing it as proposed would result in ongoing, and unnecessary, safety issues to persons at these areas of the park. The earth slope is currently highly unstable. Large trees have fallen onto the beach area as a result of erosion caused by several coastal storms over the past 2 winters. These storms caused significant erosion of the highly erodible outwash sand that comprises the slope. The proposed slope stabilization approach is the minimum necessary to ensure the slope is stable to allow safe access by park users.

Responses to the points raised by SB are as follows:

- **Paragraph 2 of the SB letter:** CRMP Policy 1.2.2 (D)(1) does “encourage” the use on non-structural shoreline protection, but it is not a prohibition. This Policy is believed to be crafted in this manner to allow CRMC the ability to review projects on a case-by-case basis to ensure the right decision can be made for the specific site and conditions. Including the safety of the public/persons that may be adjacent to these areas and the structures located at each end of the slope. The slope protection system being proposed is the minimum necessary to stabilize the slope and provide protection and safety to people that would be adjacent to these areas when using the park. This site is located in a FEMA 100-yr (1%) storm velocity zone (V-20). To stabilize the slope, which is comprised of highly erosive/unstable outwash sand, and to protect park users and beach users a stone revetment system is required. The proposed stone revetment is located well above the mean high water (MHW) elevation, which was a purposeful part of the design, and will not affect the beach profile during normal Providence River tidal and current cycles. Per the CRMC’s Coastal Resources Management Program (CRMP) Section 1.1.8, the project clearly





meets the requirements for a Special Exception. Specifically the project meets the standard of “Compelling Public Purpose” because it is a public park (Crescent Park (formerly Rose Larisa Park)) that is owned by a Municipality (City of East Providence) for use by the general public. The current application clearly supports this finding.

- **Paragraph 3 of the SB letter:** During the stakeholder site meetings previously referenced extensive discussions about the project were had. Based on these discussions and agreements, including SB’s participation, the current design approach, plans to stabilize the slope and CRMC special exception application were prepared. To try and remain relatively brief we will not repeat our position from above but instead reference it.

We agree that the proposed re-alignment of the slope along this section of the beach is beneficial and would better support the future reopening of “Crescent Beach” for public use. This was discussed during the stakeholder meeting as a means to not only to provide more beach area but also to elevate the toe of the proposed stone revetment even further above MHW. Based on these discussions this change was incorporated in the final design.

Also realize the existing slope area was first damaged only a few years ago during the coastal storm in the winter of 2022/23. Before this storm damaged the slope, it was not damaged and/or eroded and had large mature trees that were probably more than 50 years old (these trees may actually have grown after hurricane Carol in 1954). Until the recent damage, this slope was not a source of sediment to the adjacent beach, and the beach has remained relatively stable in this area for years prior to the damage. As such, the sand on this slope is not considered critical to beach stability. To this point the experimental shoreline protection constructed along a portion of this slope, and assumed to be supported by SB, did not allow for any erosion of the slope. The City is also proposing to stockpile the excavated sand for use to nourish the beach in the future as necessary.

We disagree with the unfounded assumption that the proposed revetment system would somehow impact the horseshoe crab spawning habitat. The horseshoe crab needs sandy beach to spawn and this objection seems to be based on the assumption that the project would impact the beach. Based on the information provided above and in our Assent application, including the proposed revetment being located well above MHW, there is no basis for this assumption. In fact the beach is stable immediately to the north which is adjacent to a stone revetment system. In addition the voids within the existing stone revetment system located immediately to the north are home to various types of crabs and other marine/shoreline life. Stone revetments are known to provide habitats for all types of marine/shoreline life.

- **Paragraph 4 of SB letter:** During the stakeholder site meetings previously referenced extensive discussions about the project were had. Based on these discussions and agreements, including SB’s participation, the current design approach, plans to stabilize the slope and CRMC special exception application were prepared. This included moving both the toe and top of slope back to better fit the project purpose. We won’t go further into this issue as a means to remain relatively brief, but reference our responses above.
- **Paragraph 5 of SB letter:** We agree with SB that re-profiling the beach to provide a crescent shape and flattening the overall slope are beneficial and as a result the discussion/agreements from the stakeholder meetings this change was incorporated into the current design. However, we disagree with SB’s recommendation to place all of the excavated slope sand material on the beach. Stockpiling highly erosive sand well above the existing beach profiles would result in accelerated erosion of the pile during tide cycles until the pile was eroded to the level of the adjacent beach sections. Additionally, we





estimate about 810,000 cubic yards (cyds) of excavation would result from the slope construction. This quantity would result in a sand pile on the beach about 20 ft high (almost as high as the slope) and would completely block pedestrian lateral beach access. The existing proposal is considered a better solution because its less harmful to the adjacent environment, safer for people walking the beach, and overall a more reasonable construction approach. The existing proposal would place some of the excavated sand on the beach, to slightly raise grade during the construction. The remaining excavated sand would be stockpiled at the DPW yard for use as needed to nourish the beach. This is a prudent long-term solution.

- **Paragraph 6 of SB letter:** We note the objection but stand by the plantings as currently recommended based on past projects. We have used Bayberry and Beach Plum at several other projects and find it not very resilient with attrition rates greater than 50% in the first few years at these projects. The loam would provide nutrients that may support some invasives, but definitely help the new plants survive those first few seasons. The loam also provides a protective layer over the highly unstable/erosive outwash sand until the vegetation is established. Without cover constant erosion of the sand on the slope during heavy rain events would create a maintenance nuisance and challenge.
- **Paragraph 7 of SB letter:** We disagree with this assertion as the project clearly meets the standard of “Compelling Public Purpose” because it is a City owned, public, park and as such qualifies for a special exception per CRMC’s CRMP section 1.1.8.

We reiterate our position that the current slope stabilization design and CRMC application is the best approach for this location. It provides protection to the slope from the FEMA 100-yr (1%) storm wave, and meets the standards for revetment and slope design, required by CRMC’s CRMP. Please note that per agreements during the stakeholders meetings, the design was modified to eliminate the potential impact to the adjacent beach profile caused by normal tides and current flow at the interface with a hard structure. The proposed stone revetment toe is now located well above the MHW tide elevation. The existing Assent application clearly meets the Special Exception, Section 1.1.8, criteria of the CRMP.

We thank you, and if you have any questions, please do not hesitate to call me.

Very truly yours,

Fairbanks Engineering Corporation

Robert W. Fairbanks, P.E.
President/Chief Geotechnical & Marine Engineer

CC: Cstaff1@crmc.ri.gov via email
Erik Skadberg, PE (City Engineer) via email
Stephanie Robat, PE (FREG) via email



2023-10-015



THE BAY CENTER
100 Save The Bay Drive
Providence, R.I. 02905
phone: 401-272-3540

SOUTH COUNTY OFFICE
8 Broad Street
Westerly, R.I. 02891
phone: 401-315-2709

HAMILTON FAMILY AQUARIUM
23 America's Cup Ave, First Floor
Newport, R.I. 02840
phone: 401-324-6020

Sent via email to: cstaff1@crmc.ri.gov

November 27, 2024

RE: City of East Providence c/o Erik Skadberg, PE
CRMC File Number: 2023-10-015

Save The Bay appreciates the opportunity to offer comments on the above-listed application. Application 2023-10-015 proposes to construct an 810' wall with two layers of 3.5-ton stone approximately 25' in length, with elevation extending from -5' to 20'. This work is proposed along Type 2 waters. Although described in the application as a "hybrid structure," the project as defined will function as structural shoreline protection which is prohibited in Type 2 waters.

Rule 1.2.2 (D)(1) sets forth CRMC's policy to "encourage the use of nonstructural methods to diminish frontal erosion associated with coastal cliffs and bluffs adjacent to Type 1 and Type 2 waters." Therefore, CRMC's Rule 1.2.2 (D)(1)(g) only permits construction to coastal bluffs and cliffs contiguous to Type 2, 3, 4, 5 and 6 waters under limited conditions. In this matter, Save The Bay contends that the applicant has not met these conditions; specifically, has not examined all reasonable alternatives to achieve its goal of repairing storm damage to the existing bank. In addition, CRMC's Rule 1.3.1 (B)(2)(a) prohibits "filling, removing, or grading" ... "on cliffs and banks... 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." A hardened +800' stone wall not only fails to enhance the area or serve as a natural buffer, but it will also degrade the adjacent shore, negatively impact the ability of the foreshore to function as habitat, and limit lateral access to and along the coast. For these reasons, Save The Bay objects to the application as proposed, and urges CRMC to deny it as currently designed.

Save The Bay objects to the approval of any shoreline protection feature that functions, *de facto*, as a structural hardened protection measure that will, over time, impair the shoreline's ability to serve as potential horseshoe crab spawning habitat and for public access. The City of East Providence's proposed wall along Type 2 waters at Crescent Beach will prevent bluff erosion that nourishes the narrow strip of beach at the base of the bluff with sand. This contravenes CRMC's policy to manage coastal headlands, bluffs and cliffs as "valuable sources of sediment for Rhode Island beaches." Rule 1.2.2 (D)(1)(a). The bluff to the south of the existing wall is a source of sand to the beach for lateral public access and in the future will be a source of sand for the City of East Providence's and the Department of Health's plans to develop a licensed swimming beach at Crescent Beach. We strongly support the plans to open Crescent Beach to swimming. However, building the +800'-long stone wall and hardening the toe of the slope will remove the sand source to the beach, reducing the beach's resilience to accelerated sea level rise and reducing the public's lateral access to the beach.

Save The Bay conducted two site visits with the City of East Providence and CRMC's Coastal Geologist and CRMC's engineering staff in late 2023 and early 2024 to review the bluff erosion to the south of the existing wall at Crescent Beach. During our meeting in November of 2023, we discussed moving the walking path inland at the top of the bank, removing some trees on the bluff that are dangerous to public access, and allowing bluff erosion to occur naturally to nourish the beach. This is a reasonable alternative to serve the purpose of this application. Save The Bay met again at the site with the City, its engineer, and CRMC staff in February of 2024, and reiterated our concerns about the proposed application as designed, and its negative impact on beach nourishment, habitat and public access to the shoreline.



Save The Bay supports the component of the plan that includes carving back the shoreline to create a more dissipative slope. To prevent erosion along the existing revetments to the north and south of this shoreline, we support the use of a limited amount of stone to tie into the regraded slope. We object to removing the sand that is proposed to be carved back from the bank to an offsite location, and we urge CRMC to require that that material remain on the beach to provide a source of sand for lateral public access and habitat.

In the area that is proposed for native shrub planting, Save The Bay objects to the addition of loam to the regraded bank, as it will encourage invasives that will outcompete native vegetation in more nutrient-rich soils. Some of the shrubs (with the exclusion of *Rosa rugosa* since it is considered invasive) that are included on the planting list, including beach plum and bayberry, can thrive in sandy soils and would not need the addition of loam. Additionally, native warm-season grasses such as switch grass (*Panicum virgotum*) for the upper bank and beach grass (*Ammophila breviligulata*) for the lower bank should be added to the planting plan.

For these reasons, Save The Bay does not believe this application warrants a special exception as described in CRMC's Rule 1.1.8. As we describe above, reasonable and less impactful alternatives are available, demonstrating that the applicant has not taken reasonable steps "to minimize environmental impacts and/or use conflict;" and that even if CRMC finds that this application presents a "compelling public purpose," the applicant has not shown that there are "no reasonable alternative means" to serve that purpose. In fact, Save The Bay has offered numerous less detrimental alternatives during multiple site visits. Therefore, we object to this application and urge CRMC to deny it as proposed.

Sincerely,



Jed Thorp
Director of Advocacy, Save The Bay
jthorp@savebay.org

