

CRMC DECISION WORKSHEET

2023-10-015

City of East Providence

Hearing Date:			
Approved as Recommended			
Approved w/additional Stipulations			
Approved but Modified			
Denied		Vote	

APPLICATION INFORMATION						
File Number	Town	Project Location		Category	Special Exception	Variance
2023-10-015	East Providence	701 Bullocks Point Avenue		B	X	☐
		Plat	414			
		Owner Name and Address				
Date Accepted	11/02/2023	City of East Providence		Work at or Below MHW	☐	
Date Completed	10/7/2025	c/o Erik Skadberg, PE 145 Taunton Avenue		Lease Required	☐	
		East Providence, RI 02914				

PROJECT DESCRIPTION

To construct a shoreline protection system along the southern end of Crescent Park which includes re-grading the existing slope and relocating the toe approximately 30 ft landward from the location of the toe prior to recent storm damage, which is the current location of toe of bluff. Removal of existing slope vegetation as needed for safety during and after construction, and the construction of a stone revetment system along the shoreline with a vegetated slope incorporating an erosion control mat and coir logs above the revetment. The work includes reconstructing the existing wooden stairs at a new location to the north to maintain access to the beach at the park's southern end.

Also work includes the following:

Crescent Park

1. Construct a 10 ft wide sand berm along the seaward side of the proposed revetment toe at a maximum slope of 3H:1V;
2. Plant American beachgrass on the sand berm spaced at 1 foot on center;
3. Install post and rope fencing at the toe of the sand berm to protect vegetation;
4. Place sand in the revetment stone matrix, as feasible;
5. Place sand in the revetment stone matrix along Crescent Park's northern shoreline (CRMC # 2022-02-036), as feasible;
6. Place sand at end of Beach Road (above high tide line) after completion of the new stormwater system construction; and,
7. Regrade beach profile seaward of the sand berm up to the high tide line at a maximum slope of 10H:1V where feasible.

Sabin Point

1. Construct sand berm with a maximum slope of 3H:1V;
 2. Plant American beachgrass on the sand berm spaced at 1 foot on center;
 3. Remove and demolish/abandon existing buried drainage utilities as shown;
 4. Install post and rope fencing around the perimeter of the sand berm to protect vegetation;
- and,
5. Install timber access mat over sand berm for pedestrian access.

KEY PROGRAMMATIC ISSUES

Coastal Feature: coastal bluff with a vegetated upper section of bluff all fronted by coastal beach

Water Type: Type 2 Low Intensity Use, Providence River

Red Book: 1.1.8, 1.3.6, 1.2.3, 1.3.1(B) and 1.3.1(G)

SAMP: n/a

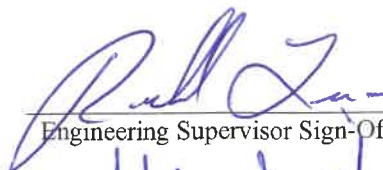
Variances and/or Special Exception Details: **CRMP Red Book § RICMRP, Section 1.3.1.B.2.(a) Filling, Removing and Grading of Shoreline Features, Prohibitions** "Filling, removing, or grading is prohibited on beaches, dunes, undeveloped barrier beaches, coastal wetlands, cliffs and banks, and rocky shores 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."

Additional Comments and/or Council Requirements: none

Specific Staff Stipulations (beyond Standard stipulations):none

STAFF RECOMMENDATION(S)

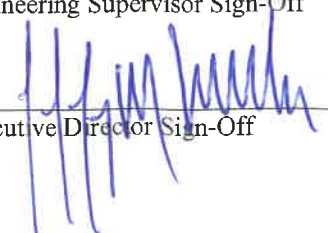
Engineer	<u>RML</u>	Recommendation:	<u>No Objections</u>
Biologist	<u></u>	Recommendation:	<u></u>
Other Staff	<u></u>	Recommendation:	<u></u>


Engineering Supervisor Sign-Off

10/7/25
date

Supervising Biologist Sign-off

date


Executive Director Sign-Off

10/7/25
date

Staff Sign off on Hearing Packet (Eng/Bio)

date

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

TO: Jeffrey M. Willis, Acting Executive Director
DEPT: Coastal Resources Management Council
FROM: Richard M. Lucia, P.E.
DEPT: CRMC Engineering Section

Date: 10/7/2025

SUBJ: **CRMC File No.:** A2023-10-015

Owner: City of East Providence

Site Address: 701 Bullocks Point Avenue Plat: 414 Lot: 7,8,8-1

Site Town: East Providence

Project: The City of East Providence proposes to repair significant storm damage to the existing bank and construct a new revetment along an approximate 810 ft section of shoreline at Crescent Park. To protect the shoreline, park land, and persons using the park, the Applicant seeks to construct a shoreline protection system along the park's southern end which includes: re-grading the existing slope and relocating the toe approximately 30 ft landward from the location of the toe prior to recent storm damage, which is the location of the current toe of bluff. Removal of existing slope vegetation as needed for safety during and after construction, and the construction of a stone revetment system along the shoreline with a vegetated slope incorporating an erosion control mat and coir logs above the revetment. The work includes reconstructing the existing wooden stairs at a new location to the north to maintain access to the beach at the park's southern end.

Additional work has been proposed to keep as much sand as possible 'in the system' since the last public notice (October 29,2024) which include:

Crescent Park

- 1. Construct a 10 ft wide sand berm along the seaward side of the proposed revetment toe at a maximum slope of 3H:1V;**
- 2. Plant American beachgrass on the sand berm spaced at 1 foot on center;**
- 3. Install post and rope fencing at the toe of the sand berm to protect vegetation;**
- 4. Place sand in the revetment stone matrix, as feasible;**
- 5. Place sand in the revetment stone matrix along Crescent Park's northern shoreline (CRMC # 2022-02-036), as feasible;**
- 6. Place sand at end of Beach Road (above high tide line) after completion of the new stormwater system construction; and,**
- 7. Regrade beach profile seaward of the sand berm up to the high tide line at a maximum slope of 10H:1V where feasible.**

Sabin Point

- 1. Construct sand berm with a maximum slope of 3H:1V;**
- 2. Plant American beachgrass on the sand berm spaced at 1 foot on center;**
- 3. Remove and demolish/abandon existing buried drainage utilities as shown;**

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4. **Install post and rope fencing around the perimeter of the sand berm to protect vegetation; and,**
5. **Install timber access mat over sand berm for pedestrian access.**

Water Type/Name: Type 2 Low Intensity Use, Providence River

Coastal Feature: Coastal bluff with a vegetated upper section all fronted by coastal beach

Plans Reviewed:

- 1) **SHORELINE PROTECTION PLANS: “Slope Repairs & Shoreline Protection, Southern Shoreline, Rose Larisa Memorial Park...,” sheets 1-18 dated September 27, 2024 by FR ENGINEERING Group, stamped by Stephanie M. Robat, P.E. and**
- 2) **SAND PLACEMENT PLANS: “Crescent Park Shoreline Protection, Crescent Park...,” Sheets C-1 to C-5 dated May 22, 2025 by FR ENGINEERING Group, stamped by Stephanie M. Robat, P.E.**

Staff Report

A-Permitting History:

Previous Assents for the site include CRMC Assent 2019-09-031. This project included the construction and monitoring of two bluff erosion control treatments—a hybrid stone and biodegradable shoreline structure with plantings, and an intertidal sill and salt marsh. This project is located along the same shoreline of Crescent Park/Rose Larisa Memorial Park. The hybrid bluff protection will be replaced as described in this project. The intertidal sill and salt marsh structure shall remain in place which has performed well.

Also, to the north of this project the large vertical seawall had failed and was replaced with a stone revetment per Assent 2021-06-014 and a CRMC Assent 2022-02-036. These assents also allowed for a retaining wall to be constructed above the revetment, to re-establish park grades and construction of timber walkover structure for public access.

B-Introduction:

Crescent Park is open to the public and the current condition of the upland section includes a 10.0-acre park situated between the historic Looft Carousel and Narragansett Bay. The park includes a walking trail, picnic tables, benches, and a musical amphitheater for concerts in the summer. The property is located along CRMC Type 2 waters, Low Intensity Use, on the east shore of the Providence River.

The shoreline consists of a coastal beach backed by a vegetated bluff by a highly erosional scarp that sits below a vegetated bluff. The bluff is approximately 20 to 30 feet in height with slopes of 1.5H:1V to 1.7H:1V. The erosional scarp is approximately 15 feet from the beach. The scarp formed from numerous storms and especially a December 23, 2022, storm event. As stated in the applicant’s engineer narrative “These storms caused additional failure of slope vegetation, including large trees that are now lying on the beach. Many of the trees remaining on the slope are situated

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such that they are likely to fall onto the beach in the near future. The beach area below the slope is used by pedestrians daily, and as a result, the current slope condition is considered a hazard....”

The proposal is for extensive re-grading of the vegetated slope (decrease the slope from 1.7:1 to 3:1) creating a more dissipative slope and relocating the toe approximately 30 ft landward from the location of the toe prior to recent storm damage, which is the current toe of bluff. Also, the work includes reconstructing the existing wooden stairs at a new location to the north to maintain access to the beach at the park's southern end.

The applicant has stated the removal of existing slope vegetation is required for safety reasons, since this beach area is often enjoyed by the public for access to the shore. After regrading, a shoreline protection structure will be constructed, consisting of 15-foot vertical stone revetment with the remainder being vegetated slope incorporating an erosion control mat and coir logs above the revetment. Please note since the stone section is greater than four (4) feet vertically it is not considered a hybrid shoreline protection (Reference Section 1.3.1.G.c) and considered a full structural shoreline protection facility.

Additionally, the City of East Providence is currently in discussion with RIDEM about making the beach a certified swimmable beach in the future. This work would include (not at this time) construction of a public bathroom facility and amenities if the certification is obtained.

Comments/Objections:

Save the Bay (STB) had concerns and objections regarding the original proposal that was going to be heard by the CRMC earlier last year (December 2024). As such the CRMC Staff reached out to STB and the City to come up with a resolution that would address their concerns. Specifically, the concern was related to the removal of sand from the bluff and placed off site instead of back onto the coastal feature/system. Also, there were concerns about the vegetation being proposed since they were considered invasive. The STB, City and CRMC staff met and the current project is the result of these discussions, which include new plans showing the placement of sand from the bluff removal (Reference Sand Placement Plans, dated May 22, 2025) and new plantings. This new proposal calls for placing as much sand as possible at Crescent Park and at Sabin Point as possible. Any remaining sand will be stockpiled at the City's municipal yard on Forbes Street and will be used in the future at these sites when beach renourishment is required.

Another concern was from a resident of the area, Dave Murray, who sent in an email and had a concern regarding the scope of this project. In particular, he was hoping that the project could be the same as the previous work along this shoreline (CRMC Assent 2019-09-031) which was “**two nature-based infrastructure treatments; Phase I is an intertidal stone sill with sand fill and salt marsh plantings and Phase II is a coir (coconut fiber) log, vegetation and stone toe structure on the bluff face.**”. Although this current project does not have a sill component and salt marsh planting like this previous project, there is an attempt to preserve the coastal beach by instead using the existing sand from the bluff. This would make the beach much more open to public access in lieu of salt marsh planting. For this reason, staff does not have objections to the new proposal.

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Please note that a supporting letter for this project was submitted by The Nature Conservancy (letter dated December 6, 2024). *“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.”* And *“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.”* Furthermore, the letter states *“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.”*

C-Review of Applicable Regulatory Requirements:

Although in some cases it is permitted and advantageous to cut back the slope of an eroding bluff to provide a less erosive profile, in this case the bluff is well vegetated and the cutting back of the bluff is considered a prohibited activity since it does not provide a better buffer from storms. Additionally, since the project adds more beach areas (public access) by adding sand and provides a safety bench to allow the public to safely access the shoreline and complies with Article 1 Section 17 of the Rhode Island State Constitution and 10’ Lateral Access Legislation (RIGL 46-23-26(c)), there are no programmatic objections to this activity.

“Red Book”/ 50-RICR-00-1

Section	Title	Subsection	Comment
1.1.8	Special Exceptions		Narrative
1.3.6	Protection and Enhancement of Public Access to the Shore		See below
1.2.3	Areas of Historic and Archeologic Significance	(A)(4): HPHC Comments	Not yet received (see below)
1.3.1(B)	Filling, Removing or Grading of Shoreline Features	(2)(a): Filling, Removing or Grading of Shoreline Features: prohibited	See below
1.3.1.(G)	Shoreline Protection		See below

Section §1.2.3(A)(4): Areas of Historic and Archeologic Significance *“Prior to permitting actions subject to its jurisdiction on or adjacent to properties eligible for inclusion (but not actually listed in the National Register of Historic Places), and/or areas designated as historically or archaeologically sensitive by the RI Historical Preservation and Heritage Commission as the result of their predictive model, the Council shall solicit the recommendations of the Commission regarding possible adverse impacts on these properties”.*

The RIHPHC has submitted comments on the project and has stated that it will have no effects on any significant cultural resources.

§1.3.1(B)(2)(a): Filling, Removing or Grading of Shoreline Features *“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”.*

The removing of bluff is not to preserve the feature or enhance the feature as a conservation area or natural buffer against storms (the bluff already is well vegetated and provides protection to the bluff), and therefore a Special Exception request has been submitted.

§1.1.8 Special Exceptions:

A Special Exceptions is required for the Filling Removing and Grading of the shoreline feature adjacent to Type 2 waters per CRMP Red Book § RICMRP, Specifically, 1.3.1.B.2.(a)

In order for a special exception be granted to a prohibited activity the proposed activity serves a compelling public purpose which provides benefits to the public as a whole as opposed to individual or private interests. The activity must meet one the following:

§1.1.8.(A)(1)(c).

An activity that provides access to the shore for broad segments of the public.

§1.1.8.(A)(2) All reasonable steps shall be taken to minimize environmental impacts and/or use conflict.

§1.1.8.(A)(3) There is no reasonable alternative means of, or location for, serving the compelling public purpose cited.

With regard to the required Special Exception:

Special Exception Criteria 1 § 1.1.8(A) (1) (c):

Per the consultant narrative “The assent sought under this application is intended to preserve and protect the public infrastructure (park green space, paths, parking, road, utilities, etc.) and sand beach area associated with Crescent Park. Crescent Park is a heavily used public park that provides access to many pedestrian recreational activities on any given day (walking, biking, sightseeing, fishing, sunbathing, kayaking, etc.). The park currently provides public waterfront access to the existing beach and the Providence River via two sets of timber stairs and a handicap ramp. Preservation of this access is of a compelling nature from the perspective of public safety and public convenience for general accessibility to recreational activities and the existing waterfront areas. In addition to the existing park uses, there are ongoing discussions with the State of Rhode Island concerning making the beach at Crescent Park a certified swimmable beach.”

CRMC staff concur with the above statement, since the project involves replenishing sand to the coastal beach/system which provides enhanced public access and complies with Article 1 Section 17 of the Rhode Island State Constitution and 10’ Lateral Access Legislation (RIGL 46-23-26(c)).

Special Exception Criteria 2 § 1.1.8(A)(2) : CRMC Staff opinion that all reasonable steps have been taken to minimize environmental impacts.

Special Exception Criteria 3 § 1.1.8(A)(3) : CRMC Staff concludes that there does not appear to be any reasonable alternatives means of, or location for, serving the compelling public purpose cited.

Section §1.3.1.G Shoreline Protection:

The proposed shoreline protection structure consists of a 15' vertical stone revetment backed by a vegetated slope incorporating an erosion control mat and coir logs above the revetment. As noted, prior since the stone section is greater than four (4) feet vertically, it is not considered a hybrid shoreline protection, (Reference Section 1.3.1.G.c) and is considered a full shoreline protection facility.. It is the staff engineer's opinion that the structure is designed in accordance with the policies and standards of this section.

Section §1.3.6.A.(1) and (2) Protection and Enhancement of Public Access to the Shore (Policies):

Per the RICMRP:

"1. As trustee of Rhode Island's coastal resources and in accordance with state and federal statutory mandates, the Council has a responsibility to ensure that public access to the shore is protected, maintained and, where possible, enhanced for the benefit of all.

2. It is the Council's policy to protect, maintain and, where possible, enhance public access to and along the shore for the benefit of all Rhode Islanders..."

It is staff's opinion that the proposal should increase public access along the shore by increasing the width of beach area and providing new and enhanced access to the shore.

D-Recommendations and Conclusions:

In reviewing this project, the CRMC staff has no objections to the installation of the shoreline protection structure, the cutting back of the bluff and adding back the sand from the bluff onto the coastal beach as it will provide a more dissipative slope, places the sand back into the coastal system, improve public access and provides much needed public safety. Overall, the applicant has worked closely with CRMC staff from preliminary stages to final design in order to best meet RICRMP regulations. Based on the above, CRMC staff recommend approval of the project. Furthermore, it is the opinion of CRMC reviewing staff that the applicant has met all the requirements for the granting of a special exception identified in CRMP Red Book § 1.1.8 and therefore, there are no objections to the granting of the Special Exception or the granting of a prohibited activity.

Signed



Staff Engineer