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RECEIVED

11-14-2025

COASTAL RESOURCES
MANAGEMENT COUNCIL

November 14, 2025

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

RE: Application 2025-01-022 (Dunes Club)
Application 2025-01-058 (John Francis & Daria Becker Barry Rev. Trust)
Application 2025-01-038 (Joseph Healey)

Director Willis,

Save The Bay, on behalf of its members and supporters, has reviewed the Coastal Resources Management Council's (CRMC) public notices for three related files; File Nos. 2025-01-022, 2025-01-058 and 2025-01-038. The applicants for these three projects propose maintenance to structural shoreline protection facilities below the high water mark along a sandy beach regularly accessed by the general public. While these seawalls have been in existence for decades, the proposed maintenance of these three structures has the potential to detrimentally impact lateral public access along the adjacent beach. For this reason, Save The Bay respectfully submits the following comments for consideration.

As documented in the public notices for these three proposed projects in Narragansett, the proposed maintenance consists of installing new Fiberglass Reinforced Sheetpile (FRP) below grade and within 12 inches of the footing of the pre-existing walls. All three designs propose to anchor the FRP to the existing walls, and encase the tops in reinforced concrete. The proposals contemplate deepening the existing structural shoreline protection facilities, and therefore deepening the barrier between the upland and the ocean. CRMC's Shoreline Change Special Area Management Plan (Beach SAMP) advises that structural barriers along the shore accelerate sediment erosion, impound and remove beach-compatible sand from the natural system, and impede lateral shoreline access. Beach SAMP §4.3.1.5 (2). The installation of an expanded sheetpile wall below grade risks exacerbating the negative impacts of the currently existing structural shoreline protection facilities at these three sites. Impacts could include increased scouring at the flanking ends of the sheetpile walls, increasing the loss of beach sediment and thereby lowering the beach profile and further eroding the public trust resources in front of these facilities. Erosion of the fronting beach can result in the migration of the shoreline further inland. Because the three pre-existing walls already impede natural landward migration of the beach, any increased scouring and erosion from the proposed FRP will likely continue to further narrow the beach in front of the

structures and further impound beach sand that cannot serve to renourish the beach. Deepening these existing structures with the proposed sheet pile walls may change the wave patterns and exacerbate sediment transfer along the shoreline, furthering the narrowing of the frontal beach. Narrowing the beach in front of these three walls would negatively impact the public's ability to laterally access the prime public trust resources along this beach.

CRMC's regulations state that it is the policy of the agency 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." 650-RICR-20-00-1.3.6 (A). Further, it is also the policy of CRMC to require that activities and alterations that are contiguous to beaches abutting Type 1 waters, such as in the instant case, shall not "significantly interfere with public use and enjoyment of such facilities." 650-RICR-20-00-1.2.1 (B)(2)(g). In those cases, CRMC is required to "suitably modify or prohibit that alteration or activity." Id.

None of the three proposed projects include a plan to provide on-site access at a similar level to what currently exists. They all propose short-term substitute access during the construction phase, but do not propose any mitigation to protect the current level of public access that will likely be negatively impacted over the design life of the project. Due to the fact that the three above-referenced proposed maintenance activities have a likelihood of negatively impacting lateral public access to the public trust resources in front of these structures, Save The Bay urges CRMC to require all three applicants to provide a plan that ensures on-site access at the same level as currently exists in front of these structures, as required by CRMC regulations.

As the trustee for the state's public trust resources and as the stewards charged to protect public access to the shore, we respectfully request that CRMC uphold its regulations and hold these three applicants accountable by preventing further beach erosion that could result from these three projects, and protect the public's ability to access the shore over the extended lifespan of these projects.

Thank you for your consideration.

Sincerely,



Jed Thorp
Director of Advocacy
100 Save The Bay Dr.
Providence, RI 02905
(401) 272-3540 x104
jthorp@savebay.org





NARROW RIVER PRESERVATION ASSOCIATION

PO Box 8 ~ SAUNDERSTOWN, RI 02874 ~ 401-783-6277

www.narrowriver.org ~ nrpa@narrowriver.org

November 14, 2025

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

RE: The Dunes Club CRMC 2025-01-022
Barry Rev. Trust CRMC 2025-01-058
Healey CRMC 2025-01-038

To Whom it may Concern:

The Narrow River Preservation Association (NRPA) is designated by the RI Rivers Council as the "state-designated Watershed Council" for the Narrow River (Pettaquamscutt Estuary) Watershed. In accordance with General Laws of Rhode Island Section 42-28-8, NRPA is provided the opportunity to evaluate and comment on proposed actions so that any resulting comments may be considered by the responsible agency. The designation also gives legal standing to NRPA for appearances and to present testimony on behalf of Narrow River and its watershed before local and state public bodies.

NRPA offers the following combined observations and comments for the three applications identified above based upon our review of the application materials and information provided by the Dunes Club:

- We greatly appreciate the efforts by the Dunes Club to inform NRPA concerning the history, need, and design details of the proposed repair work. We recognize the unique challenges facing the Dunes Club and other property owners in light of increasing beach and dune erosion along the shoreline. NRPA is not opposed to the planned repairs included in the three applications.
- NRPA recommends that the CRMC consider, during the approval process, the propriety of conducting beach profile surveys at regular intervals seaward of the seawall. This data would allow the CRMC, Town of Narragansett, and the applicants to better understand the potential for the repairs to increase scour at the toe of the new lower wall and to identify when conditions may exist in the future which could compromise the structural integrity of the repair work.

NRPA looks forward to working with all stakeholders to promote longer-term solutions to address coastal resiliency along the beach and mouth of the Narrow River. Thank you for the opportunity to provide comments.



Sincerely,



Craig Wood
NRPA Vice President
cwoodpws@gmail.com

cc: James Tierney, Town of Narragansett
Stephen Sterling, The Dunes Club



Brittany Spurlock

From: Isabella DeFrancesco <idefrancesco@surfrider.org>
Sent: Thursday, November 13, 2025 3:53 PM
To: Cstaff
Cc: atlarge@ri.surfrider.org
Subject: Comments Regarding Dunes Club Project- Surfrider Foundation

Categories: Britt

Dear Members of the Coastal Resources Management Council,

On behalf of the Surfrider Foundation Rhode Island Chapter, thank you for the opportunity to provide comments on the proposed Sea Wall Preservation Project at The Dunes Club in Narragansett. Our chapter is dedicated to the protection and enjoyment of Rhode Island's ocean, waves, and beaches through a network of volunteers working to preserve natural coastal processes, improve water quality, and enhance shoreline resilience.

While we recognize the importance of maintaining coastal safety and stability, we respectfully urge CRMC and the applicant to incorporate a more comprehensive evaluation of nature-based and hybrid shoreline protection options into the current project design.

Specifically, we recommend:

1. An Alternatives Assessment – The applicant should conduct an assessment that compares traditional hard-structure preservation to nature-based solutions, including living shorelines, vegetated berms, and hybrid designs that work with natural sediment transport processes. Such an assessment would align with Rhode Island's Beach and Shoreline Management goals and the CRMC Shoreline Change Special Area Management Plan (Beach SAMP), which prioritizes adaptive, sustainable strategies.
2. Dune Restoration Wherever Feasible – Even limited areas along the Dunes Club property could support native dune vegetation and sand fencing to stabilize the shoreline, enhance storm protection, and provide ecological benefits. These small-scale interventions can complement existing infrastructure while promoting a more resilient natural buffer against coastal hazards.
3. Post-Construction Monitoring and Maintenance – The applicant should monitor the durability of the proposed vinyl sheathing to ensure that there is no debris entering the ocean from the proposed reinforcement, with a requirement for abatement and removal should there be negative impacts identified during monitoring activities.

Looking toward the long term, we encourage CRMC and the applicant to participate in a collaborative sea level rise adaptation effort for this section of Narragansett's shoreline. Planning should prioritize nature-based resilience measures in the near-term, and include a comprehensive evaluation of all alternatives for long-term resilience planning, given the structure's close proximity to the dynamic shoreline, in addition to increasing severe storm and tidal events. Planning should prioritize nature-based resilience measures and include a thoughtful evaluation of the feasibility of relocation or managed retreat over future decades, given the building's close proximity to the dynamic shoreline.

Integrating nature-based strategies and long-range adaptation planning now will better safeguard both the built environment and the natural systems that make Narragansett's coastline so valuable to residents and visitors alike.

Thank you for your attention to these comments and for your ongoing commitment to protecting Rhode Island's coastal resources. The Surfrider Foundation Rhode Island Chapter welcomes opportunities to collaborate with CRMC and local partners on advancing sustainable coastal management practices.

Sincerely,
Isabella DeFrancesco
Northeast Regional Manager
Surfrider Foundation, Rhode Island Chapter
idefrancesco@surfrider.org



Isabella DeFrancesco
Northeast Regional Manager
Pronouns: She/Her/Hers
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[The Ocean Needs More Friends](#)

TOWN OF NARRAGANSETT MEMORANDUM

To: Alex Menzies, Town Council President
Members of the Town Council
Coastal Resources Management Council **Date:** 11/13/2025

From: Larry Vranka, Narragansett Conservation Commission/Tree Board Chairman *LAV*

Subject: CCRM Assent File Number(s) 2025-01-022, 2025-01-038, 2025-01-058
Application of The Dunes Club, Narragansett Assessors' Plat A, Lot 33
Application of Joseph Healey, Narragansett Assessors' Plat A, Lot 2
Application of John Francis & Daria Becker Barry, Narragansett Assessors' Plat A, Lot 34

At its meeting on November 4, 2025, the Narragansett Conservation Commission / Tree Board (CC/TB) considered the above referenced Assent applications for the proposed maintenance of the existing seawall located at The Dunes Club, and the Healy and Francis/Barry private residences.

Upon review, the CC/TB has concerns and questions regarding the installation of a new Fiberglass Reinforced Sheetpile (FRP) within 12" of the existing concrete footing on the seawall. Our concerns are as follows:

- a) We noted a lack of detail in the application. For example, the project timeline is unknown. No details related to the expected completion time were provided, nor if the project will be completed in phases. In addition, the renderings and engineering drawings included lacked detail were therefore of limited utility during review.
- b) It appears considerations relating to the environmental and ecological impacts were not included. The nature of the proposed construction has potential to affect biodiversity within the swash zone along the Town beach.
- c) A detailed plan depicting ingress/egress locations for construction equipment to access the beach during construction was not included.
- d) There are no details submitted describing the effects of adding additional hardened coastal structures. Increasing the amount and distance the sea wall extends will affect wave dynamics and natural sediment flow. The CC/TB has concerns about the new footing increasing erosion rates of that section of beach as well as the potential for creating a hazardous walking environment for members of the public given the footings will be underground.
- e) The alternate public access route delineated on the site plan attached to each application is proposed to be over an existing built-up sand dune with vegetation. The dune aids in protecting Boston Neck Road from significant storm surge events and helps mitigate coastal flooding during high tides. The CC/TB is concerned that allowing foot traffic over the established dune will potentially damage and destroy the



coastal feature and possibly increase the risk of coastal flooding along Boston Neck Road.

- f) It is unclear that the proposed FRP will be effective long term. For example, has this solution been deployed successfully elsewhere in comparable conditions? If the proposed project proves ineffective, the environmental impacts of maintenance on the new seawall appear to be unknown.

The CC/TB respectfully requests that the CRMC consider these concerns in the course of their determination and approval process.



Brittany Spurlock

From: Rich Lucia
Sent: Friday, November 7, 2025 3:44 PM
To: Cstaff
Subject: FW: pic

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Britt

Please put in paes...2025-01-022

From: Wood, Craig <Craig.Wood@jacobs.com>
Sent: Friday, November 7, 2025 2:41 PM
To: Rich Lucia <rslucia@crmc.ri.gov>
Subject: RE: pic

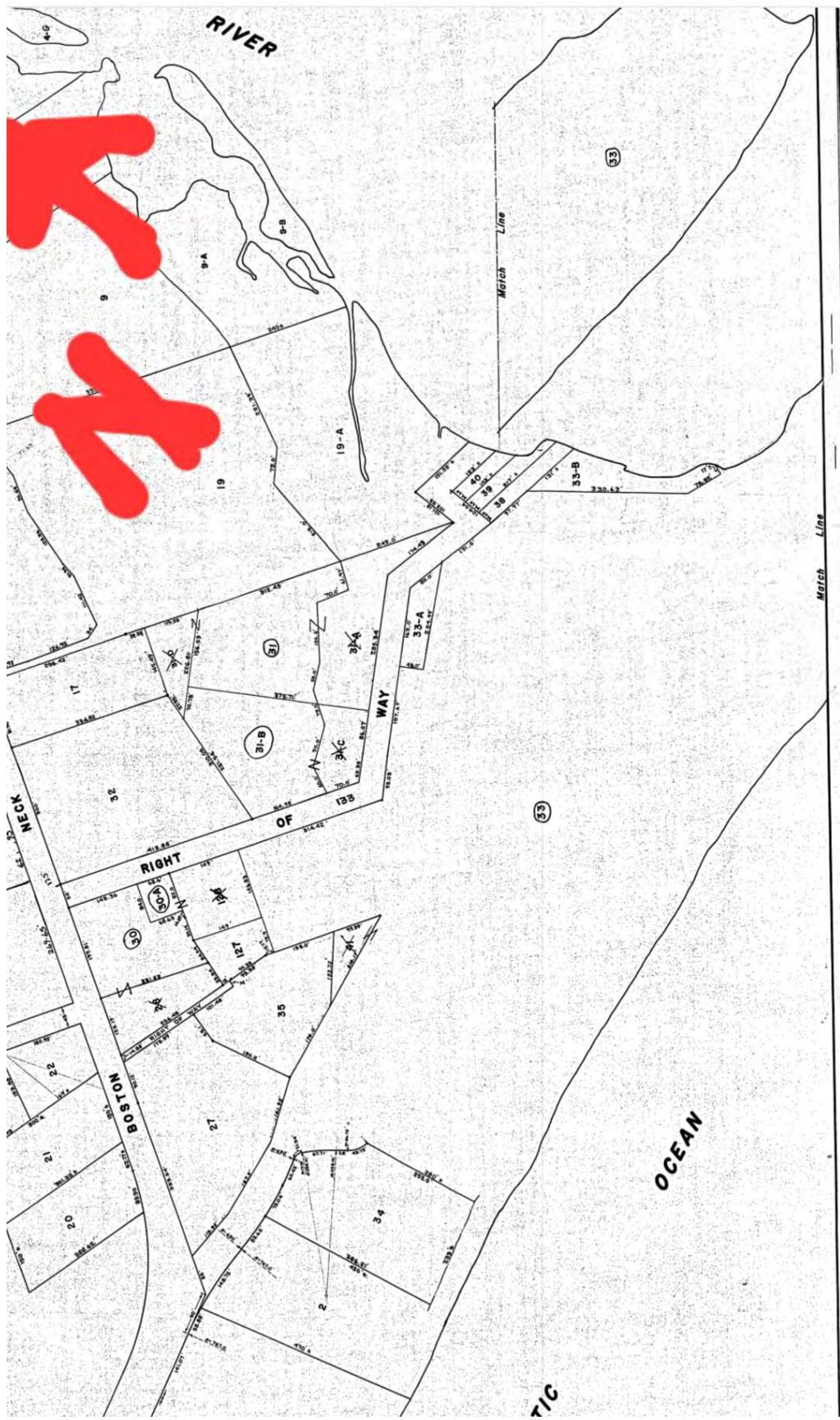
Hi Rich: From Steve Sterling:

The Dunes Club does not have any public access. During our off season we have our gate to the back parking lot open from 7am - 3pm as that is the hours of operation for most of our winter crew. We do allow walkers to pass through the parking lot and get to the river if the tides are too high or it is too windy on the beach. We have also let cars park during those hours for surfers or fisherman to access the river and shoreline. We close the gate at 3 pm and many times we have locked people in. The gate is closed every evening and weekend. This policy will be the same during the repair to the wall with the exception we will have security guards on duty during the days we are open as walking and parking could be limited depending on the progression of the project. The three paths you refer to will be closed every evening and every weekend as the beach will have no obstructions for anyone who is enjoying it. I hope this helps clarify your questions Enjoy the day Steve

[Craig Wood, PWS | Jacobs](#) | Senior Wetland Scientist | People & Places Solutions
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120 Saint James Avenue, 5th Floor Boston, MA 02116
Craig.Wood@jacobs.com | www.jacobs.com

From: Rich Lucia <rslucia@crmc.ri.gov>
Sent: Friday, November 7, 2025 9:55 AM
To: Wood, Craig <Craig.Wood@jacobs.com>
Subject: [EXTERNAL] pic





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