

DANNI GOULET, LLC

November 18, 2025

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

Attention: Mr. Jeffrey Willis
Executive Director
jwillis@crmc.ri.gov

Reference: The Dunes Club, Healey, Barry
2025-01-022, 2025-01-038, 2025-01-058
Seawall Maintenance Projects

Dear Mr. Willis:

On behalf of applicants of the above referenced projects, please see the responses to the public comments and staff questions about the applications. We have provided a consolidated response as the public comments were addressed as such and the walls will be constructed as a singular element to provide the necessary protection against undermining due to erosion and scour.

Many of the comments are concerned that there will be a loss of sand due to the repair. The beach, all the way from the Town beach northerly past the Dunes Club has lost sand both vertically lowering the beach and horizontally narrowing the beach. This loss of beach is likely to continue with or without the repair. The reason for the proposed maintenance is to prevent scour under the wall which will create conditions for a failure of these walls leading to significant impacts on the public access. This was recently seen when the house at the Narrow river was undermined.

We agree that a longterm sand management program for the entire beach system from the town beach to the river is the best way to ensure that the public has access to the entire beach.

Below are the comments or a synopsis of the comments in the left hand column and the response or comment in the right side column.



Save the Bay Comments include

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 access the prime public resources along this beach.

..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-20-00-1.2.2(B)(2)(g). In those cases CRMC is required to suitably modify or prohibit that alteration or activity"

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

The beach, all the way from the Town beach northerly past the Dunes Club is experiencing a loss of sand both vertically lowering the beach and horizontally narrowing the beach for its entire length, even in areas without structures.

This climate change fueled beach process is likely to continue with or without any proactive maintenance work on the walls. The reason for the proposed maintenance is to prevent scour under the walls from this ongoing process which will lead to a failure of these walls which will significantly impact public access. This is not a hypothetical could or may claim, it was recently seen when the house at Narrow River was undermined.

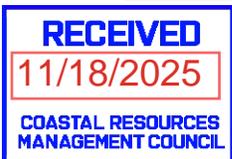
The sand behind the existing walls, walls that we are required to maintain, is impounded from the natural beach process and can't be further impounded. If the sand were to become un-impounded, that would mean the wall failed with its environmental and public access issues.

The work when completed will not result in a significant interference with the public use of the area. It was carefully designed so that when completed, the conditions that exist today, prior to the necessary repairs, will be the same. The toe protection of the walls will not affect the flanking but will reduce the possibility of the walls failing.

The continued effects on the beach due to erosion will be challenging to discern with or without the wall repair. What will be discernable is the likelihood of a wall failure and upland structure failure impacting the public access to the beach. The Dunes Club would love to be able to protect the current level of access as they are a beach club so



<p>access to the public trust resources in front of these structures,</p>	<p>more beach is always welcome. But the natural changes to beaches in this area with all of the other man made impacts such as structures and beach nourishment up and down the beach make guaranteeing any condition impossible. A long term beach wide sediment management plan would be the best chance of protecting access. The scour protection will also be an indicator of when the beach needs to be nourished while providing some time to accomplish the work without a threat to the wall stability.</p> <p>Section 1.2.3(1) states that the Councils goal is to, where possible preserve and protect significant historic and archaeological properties in the coastal zone</p> <p>Section 1.2.3(3) states that the Council shall require modification of, or shall prohibit proposed actions subject to its jurisdiction where it finds a reasonable probability of adverse impacts on properties listed in the National Register of Historic Places. The Dunes Club is listed and the other two properties are eligible for listing.</p>
<p>Surfrider Foundation comments</p> <p><i>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.</i></p>	<p>While several alternative designs have been submitted to CRMC and numerous other designs were evaluated, the limitation of NO new structures in Type 1 Waters and the limitation of 12” seaward extension from the existing footing limit for maintenance in Type 1 Waters preclude any of these hybrid approaches in this location without a change in the CRMC regulations. The public notice does not typically contain these details. They are part of the full file which may not have been available during their review.</p>



<p><i>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.</i></p> <p><i>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</i></p> <p><i>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.</i></p>	<p>The Dunes Club is happy to work with the Surfrider Foundation to collaboratively enhance the dunes to provide a more resilient buffer. This project was narrowly focused to be the minimum necessary toe protection from scour and meet the CRMC maintenance regulations. While we are not opposed to any dune work it was not considered part of the minimum maintenance necessary.</p> <p>The Fiberglass Reinforced Sheet Polymer (FRP) is a robust product with a long history of maintaining structural integrity. It is critical to the Dunes Club that we select a product that is capable of maintaining its structural integrity under potentially adverse conditions so that scour under the wall is prevented. If there were an issue with the wall it would be corrected quickly.</p> <p>The Dunes Club and the adjacent property owners agree that a long term collaborative solution for the entire beach area (down to the Town beach) and the mouth of the Narrow River is what is necessary and would like to play a significant part of any plan.</p>
<p>Narrow River Preservation Association</p> <p><u><i>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.</i></u></p> <p><i>NRPA recommends that the CRMC consider, during the approval process, the propriety of conducting beach profile surveys at regular</i></p>	<p>The Dunes Club does not oppose these surveys but thinks that to better understand the entire beach system and the effects of</p>



<p><i>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.</i></p>	<p>beach erosion that a beach wide survey be done to understand the total beach loss. If we only survey the area adjacent to the wall, its likely that the natural changes of the beach elevation will associated with the repair when that may not be the case. A study of the littoral process along this shoreline is needed in order to develop a long term sand management plan.</p>
<p>Town of Narragansett comments</p> <p>We noted a lack of detail in the application for example timeline and drawings lacked detail so were limited in their utility for review.</p> <p>It appears considerations relating to the environmental and ecological impacts were not included such as the proposed construction has the potential to affect biodiversity at the Town beach.</p> <p>There are no details submitted describing the effects of adding additional hardened coastal structures. Increasing the amount and distance the seawall extends will effect wave dynamics.....new footing increasing the erosion rates of that section of beach....hazards of new of footing to walking.</p> <p>The alternate public access is proposed to be over existing dunes – this foot traffic will potentially damage or destroy the coastal feature and possibly increase flooding along Boston Neck road.</p>	<p>It is not clear if the Conservation commission reviewed the entire application or simply the information included in the Public Notice. The application discusses the time line for construction and the anticipated start date. The plans include profiles, elevations of new and proposed elements down to the reinforcement bars proposed for the cap. The construction method for installing the inert FRP sheet piles is detailed. It is not typical for a maintenance application to discuss potential impact to biodiversity during a period of low biological activity on a site over 2,000 feet away.</p> <p>These potential effects have been discussed in the above responses other than the potential hazard of the footing. The cap is over the existing footing and only extends 12” seaward of the existing footing. It will be a continuous concrete cap similar to the existing so not sure how it will be a hazard versus the current condition.</p> <p>The alternative construction pathways utilize existing pathways in the dunes so the potential impacts are limited and are likely to remain the same as they are pre-construction. The work is in the winter when foot traffic is modest.</p>



<p>It is unclear if the FRP will be effective long term.</p>	<p>The proposed FRP is designed for long-term toe protection in the event of scouring at the wall due to natural littoral processes and/or significant storm events. The FRP will prevent the existing walls from being undermined and failing due to loss of the beach. The FRP toe protection will allow time to provide necessary beach nourishment to maintain the wall and restore the beach. This typical scour prevention solution is generally an effect repair</p>
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Question from the Rich Lucia email of 10/22/2025

Todd/Dan

Getting into reviewing these projects into detail...it appears that the footing of the dunes club footing (3'-6" seaward section) could also be cut back (similar to the Barry design) and still accommodate the tieback/sheetpile system and provide the necessary resistance against overturning and sliding. As well documented the footing are exposed frequently and can hinder public access.

Also the plans show for Barry the removal of the Ernie George footing but not the existing sheetpile...the sheetpile needs to be removed. Also Healy has the Ernie George footing w/sheetpile design.this should be shown as being demolished and removed. Please address.

RESPONSE

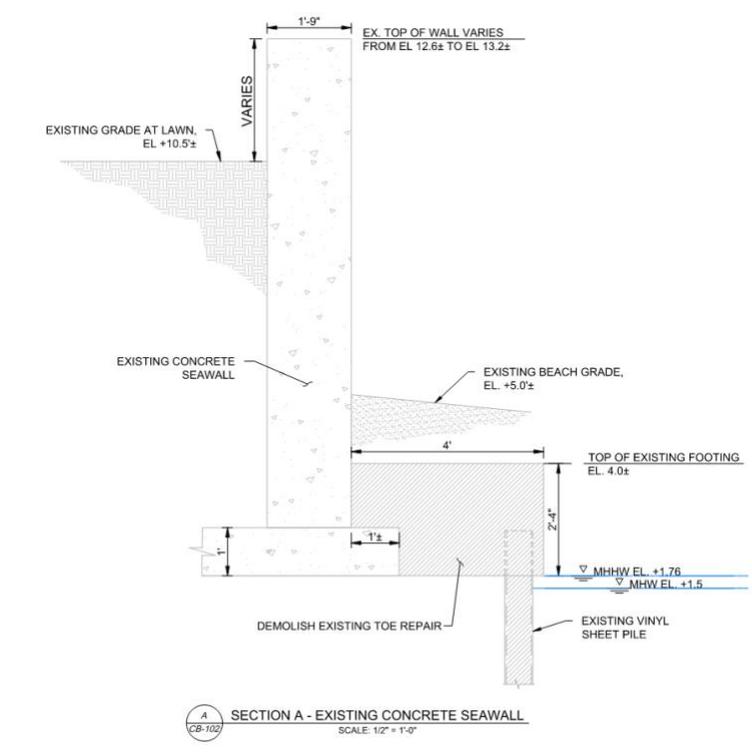
Rich,

Thank you for your comments/questions. Please accept the following as our response:

The structural integrity of the concrete wall is dependent on that footing toe of the retaining wall. If we remove that the structural integrity of the entire wall will be in jeopardy and with the limited depth of the toe protection for the wall, there is not enough area to design an alternative repair. As you pointed out it is well documented that the footing is frequently exposed and in jeopardy of being further undermined, but to date it has been stable because the soil under the footing has not been compromised. Changing the design of the existing footing is not prudent or recommended, as this wall is different than the Barry wall.

The revised plans dated Oct. 1, 2025 included the removal of the sheet pile wall. See snippet from plans below:





As for the Healy property and the Ernie George repair, there was no evidence that it was installed when the test pits were completed by NDW, so including those on the plan were not accurate as to what was observed in the field. If the previous repair is encountered during construction of the new toe protection, it will be removed similar to the proposed work for Barry.