

## MEMORANDUM

DATE: October 1, 2025

TO: Danni Goulet ([dan@dannigoulet.com](mailto:dan@dannigoulet.com))

CC: Matt Melchiori ([mmelchiori@reaganmarine.com](mailto:mmelchiori@reaganmarine.com))

FROM: Todd D. Turcotte, P.E.  
Vice President 

RE: **Dunes Club, Healy, and Barry Properties  
CRMC Wall Maintenance Comments  
Narragansett, RI  
Pare Project No. 25115.00**



R. Lucia's 09-18-2025  
Email pgs 5 & 6

In response to Rich Lucia's comments in his email dated September 18, 2025 and as discussed in our call, please find our response/clarifications below:

- *Comment/Question: at Berg property there was a toe repair performed with a larger footing and sheetpiles at "Section C", this is not shown on the plans, please clarify. For clarity lets call it the "Ernie George Plan" henceforth.*

**Response:** Section C has been updated and is attached for submission. It should be noted that the larger footing was not found during the test pit excavation conducted by NDW/Reagan, and it is uncertain whether it was installed as permitted for the entire length.

- *Comment/Question: At Healey property there was an Assent to build the "Ernie George Plan". The submitted cross section do not show this, the existing footing would be larger than shown on submitted plans. Is this footing going to be reconfigured like Bergs?*

**Response:** During the test pit excavation, the repair found on this property was a flow fill under the wall, not the same repair as the Barry (Berg) property; therefore, the plans indicated that the footing extents will be confirmed during the installation and will need to be removed/adjusted accordingly. As-builts of the repair were not available to Pare.

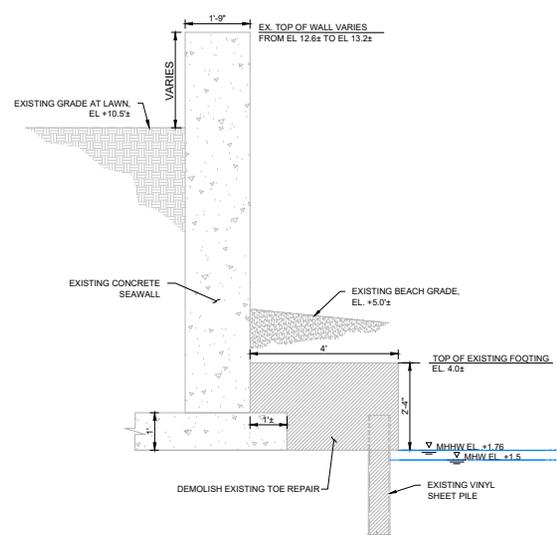
- *Comment/Question: Dunes Club shows a 3'-6" footing. (Does this have the Ernie George Plan" footing with sheetpile scour protection).*

**Response:** No, this does not have the "Ernie George Plan footing" this is the footing from the original wall repair. The bottom of the footing was previously exposed and was confirmed from the test pit exaction performed by NDW/Reagan.

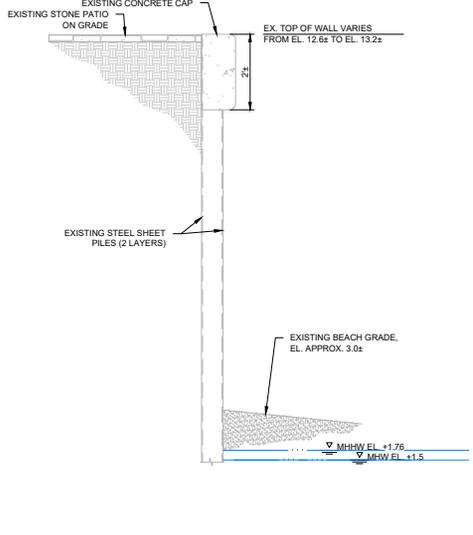
- *Comment/Question: Before I put these projects out to notice, all the plans need to show the accurate footing elevations (existing and proposed) as well as the new clearance height of wall above the new footing (e.g. distance from top of footing to top of wall). Also, the seaward extent of the existing and proposed footing of Healy project.*

**Response:** Cross sections have been updated to provide additional information requested.

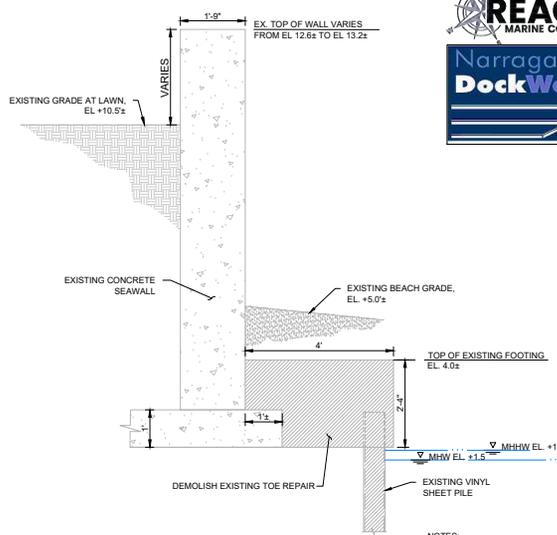




**SECTION A - EXISTING CONCRETE SEAWALL**  
SCALE: 1/2" = 1'-0"

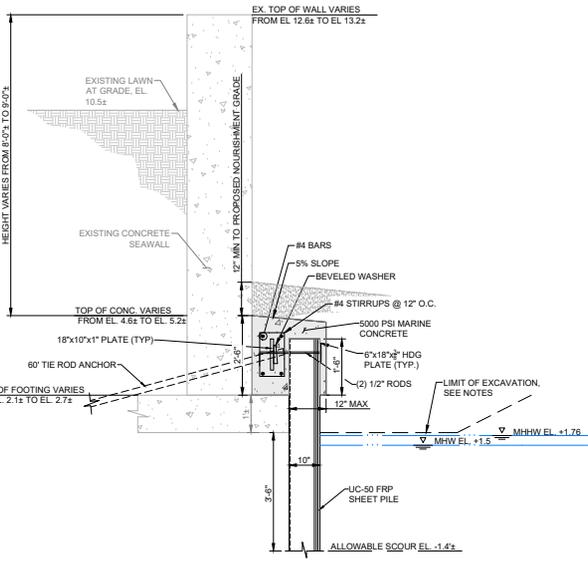


**SECTION B - EXISTING STEEL SHEET PILE SEAWALL**  
SCALE: 1/2" = 1'-0"

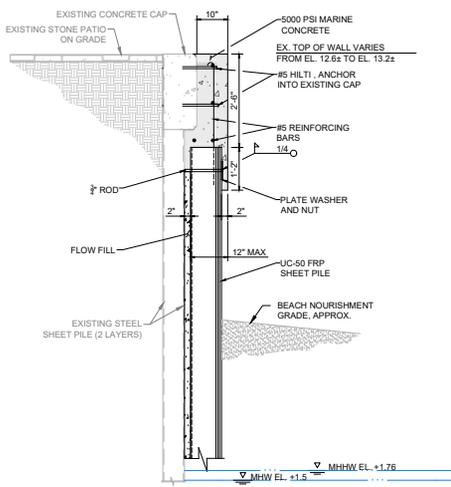


**SECTION C - EXISTING CONCRETE SEAWALL**  
SCALE: 1/2" = 1'-0"

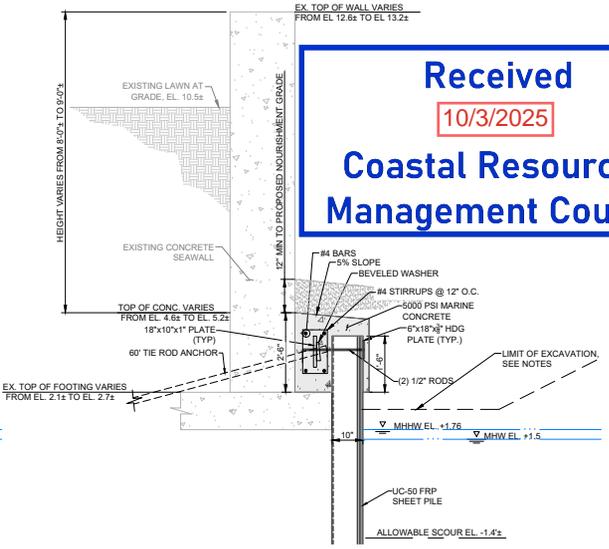
- NOTES:**
- CONTRACTOR IS RESPONSIBLE FOR SAFE EXCAVATION SIDE SLOPES (±2H:1V) AND SHALL BE VERIFIED AND MAINTAINED BY THE CONTRACTOR.
  - BEACH NOURISHMENT REQUIRED IF BEACH GRADE REACHES ALLOWABLE SCOUR LINE.



**SECTION A - PROPOSED SEAWALL PROTECTION**  
SCALE: 1/2" = 1'-0"



**SECTION B - PROPOSED SEAWALL PROTECTION**  
SCALE: 1/2" = 1'-0"



**SECTION C - PROPOSED SEAWALL PROTECTION**  
SCALE: 1/2" = 1'-0"

**Received**  
**10/3/2025**  
**Coastal Resources**  
**Management Council**

ISSUED FOR PERMIT REVIEW  
NOT FOR CONSTRUCTION  
IF PRINTED 11X17 DRAWING IS HALF SIZE





From: [Rich Lucia](#)  
To: [Danni Goulet](#); [Todd Turcotte](#)  
Subject: RE: Dunes Club wall maintenance  
Date: Thursday, September 18, 2025 10:13:00 AM

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Dan and Todd.

The following is necessary before I can send this out to public notice:

- An abutters list for each property.
- at Berg property there was a toe repair performed with a larger footing and sheetpiles at “Section C”, this is not shown on the plans, please clarify. For clarity lets call it the “Ernie George Plan” henceforth.
- At Healey property there was an Assent to build the “Ernie George Plan”. The submitted cross section do not show this, the existing footing would be larger than shown on submitted plans. Is this footing going to be reconfigured like Bergs?
- Dunes Club shows a 3’-6” footing. (Does this have the Ernie George Plan” footing with sheetpile scour protection).
- Before I put notice these projects out to notice, all the plans need to show the accurate footing **elevations (existing and proposed) as well as the new clearance height of wall above the new footing (e.g. distance from top of footing to top of wall) . Also the seaward extent of the existing and proposed footing of Healy project .**

Thanks

Rich

Richard Lucia, P.E.  
Environmental Engineer IV  
RI Coastal Resources Management Council

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**From:** Danni Goulet <dan@dannigoulet.com>  
**Sent:** Monday, September 15, 2025 5:11 PM  
**To:** Rich Lucia <rlucia@crmc.ri.gov>  
**Subject:** Dunes Club wall maintenance

Rich

Hope all is well. Things sound busy there with the golf club wall - i do not envy you on that one. Just following up the Dunes club and two neighbors wall repair application - I don't see it in the database yet wondering if you can give me any update.

Dan

Thanks,

Dan

Danni Goulet, PE  
Danni Goulet, LLC  
(508) 212-2253  
[dan@dannigoulet.com](mailto:dan@dannigoulet.com)

## Oliver Allamby

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**From:** Rich Lucia  
**Sent:** Thursday, August 7, 2025 10:45 AM  
**To:** Cstaff  
**Subject:** FW: Dunes Club (et al)

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**Categories:** Oliver

Please put this in **2025-01-022, 2025-01-038, 2025-01-58**

**Thanks**  
**Rich**

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**From:** Rich Lucia  
**Sent:** Tuesday, May 13, 2025 10:53 AM  
**To:** Danni Goulet <dan@dannigoulet.com>; Laura Miguel <lmiguel@crmc.ri.gov>; Jeff Willis <jwillis@crmc.ri.gov>; Sean O. Coffey <scoffey@darroverett.com>  
**Subject:** RE: Dunes Club (et al)

Dan,

Thanks for reaching out. I have reviewed the informational letter (May 1, 2025, from Sean Coffey, Esq.) with Jeff and Laura...to optimize a future meeting and/or resubmittal, there is information/concerns that was in this letter that CRMC needs addressing prior to meeting and/or resubmittal:

Best if I just if I do a list here, the concerns, but not limited too, are below:

- Firstly, as was discussed in meeting with the consultant and owners, CRMC opinion at this time is that constructing **landward of the existing walls is feasible option**. This alternative would provide the protection that the applicant is seeking. Again, this would most likely eliminate any impacts to public access along this very heavily utilized beach. To evaluate the project, this alternative needs to be investigated and addressed in detail.
- The submitted narrative states this type of repair has been done in Rhode Island in “hundreds of locations”. Although this may be true for the commercial and industrial harbors, CRMC however disagrees that there has been this level of repairs adjacent to a Type 1, Conservation Area, Coastal Beach where there is a long history of major public lateral access.
- **Please note, the Dunes Club has already expanded the wall 1’ seaward via CRMC Assent 1992-01-050.**

In regard to the latest information, although this does not remove the above important concerns, more details are required for review regarding:

- The letter states that a 2’ diameter casing (this was not mentioned in the first submittal) will be installed and then removed (correct?) after installation of the King Pile (W flange beam) (in order to hold back the sand and protect the hole from collapsing?). Will the sheetpiles be welded to the King Piles and to what extent? Using the 2’ diameter casing and then removing the casing the furthest seaward of **the new wall will be approximately 24” (+/-) seaward**. Please clarify if this is correct. (This came from looking at the 16” king pile surrounded by a 2’ diameter casing and a clearance of 2” from the existing wall.) In order to

properly evaluate this project, CRMC requires a cross section of each different wall section design (existing and proposed). In other words, **a plan view (birds eye) cross section views.**

- Has the use of smaller piles/sheetpiles to limit the encroachment seaward been examined, there has been no structural design justification provided at this time.
- The plans for Healey calls for removing 6” of concrete/stone from the bottom section of the tapered wall and starting the wall from that point. CRMC need to see how far out seaward the base of the wall juts out **and** how far out the new wall would be from the existing face of wall.
- The plans do not show the extent of the Arched Section being removed of Barry property, please provide further details.
- Will Temporary Easements be obtained for the temporary public access?

Thanks

Richard

Richard Lucia, P.E.

Environmental Engineer IV

RI Coastal Resources Management Council

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**From:** Danni Goulet <[dan@dannigoulet.com](mailto:dan@dannigoulet.com)>

**Sent:** Thursday, May 8, 2025 10:15 AM

**To:** Rich Lucia <[rlucia@crmc.ri.gov](mailto:rlucia@crmc.ri.gov)>

**Subject:** Dunes Club (et al)

Hi Rich

Hope all is well. I am following up the Dunes Club letter (along with Barry and Healy). Did you have any questions or would you like to meet before we resubmit the revised application. We tried to answer your concerns from the deficiency and want to make sure any re-submittal hits the things you would like to see.

Thanks,

Dan

Danni Goulet, PE  
Danni Goulet, LLC  
(508) 212-2253  
[dan@dannigoulet.com](mailto:dan@dannigoulet.com)



DarrowEverett<sup>LLP</sup>

Sean O. Coffey, Esq.  
scoffey@darroweverett.com

May 1, 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. Rich Lucia

Reference: The Dunes Club  
Boston Neck Road Properties  
Seawall Maintenance Project  
137 Boston Neck Road  
Narragansett, RI 02882



Dear Mr. Lucia:

I write on behalf of The Dunes Club, (the “Applicant”) to provide you with responses to the Notice of Deficient Application (2025-01-022) that is dated February 4, 2025. These responses have been provided as the Dunes Club initial response to the CRMC’s concerns. Prior to resubmitting the application, we are seeking a meeting to discuss the necessary maintenance work.

This letter focuses on The Dunes Club portion of The Seawall Maintenance Project. Separate letters will be provided to you to address the notices issued to John Francis and Daria Becker Barry Revokable Trust, Application # 2025-01-058 (131 Boston Neck Road) and to Joseph Healey Application # 2025-01-038 (129 Boston Neck Road). While separate applications have been requested, The Seawall Maintenance Project is an integrated effort involving the three properties.

*Provide a Concise and complete description of the work proposed*

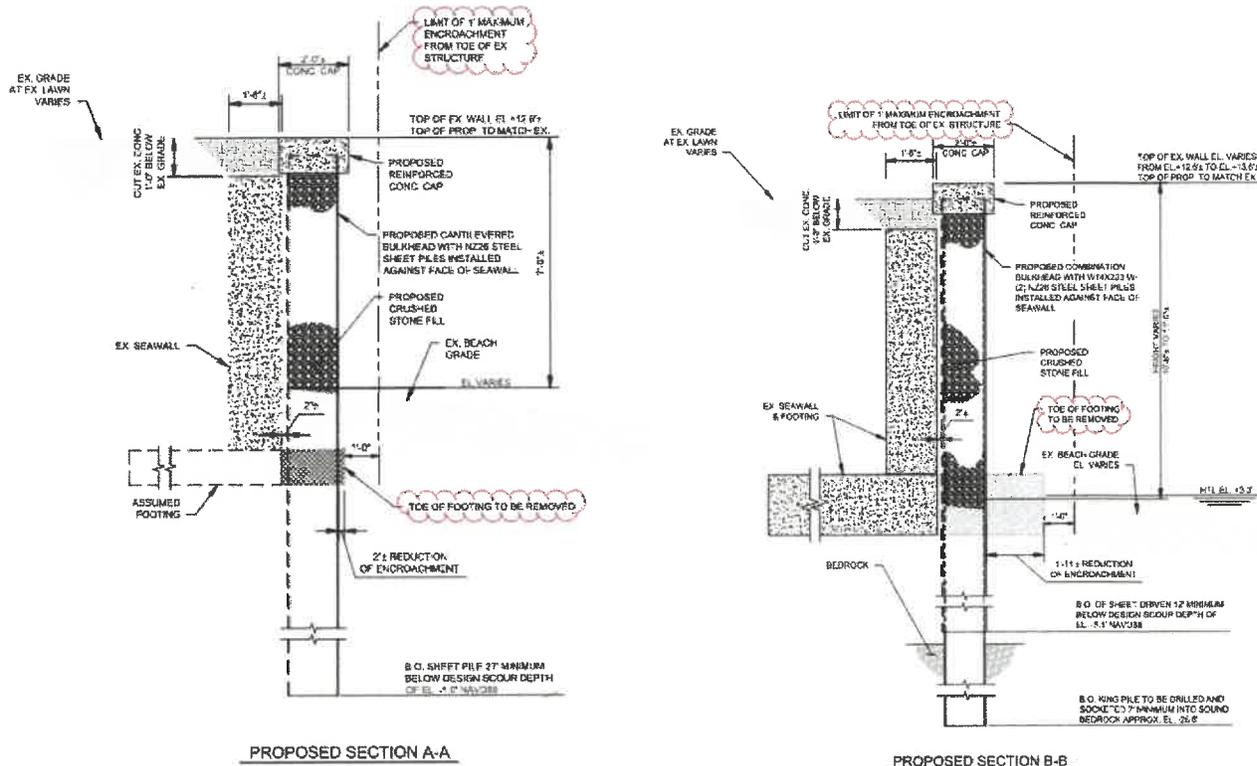
The proposed maintenance work will remove the existing toe of the concrete footings that extend waterward approximately 8” to 48” from the face of the seawall, as authorized under Ascent 1992-01-050 and then drive new sheetpiles as close to the existing seawall face as possible in the following sequence. We will excavate sections in front of the existing walls to expose the footing while simultaneously bracing the wall. With the footing exposed and the work area safe, removal of the footing toe with concrete saws and or hydraulic demolition hammers will be executed. The demolition materials will be removed from the site and legally disposed of at an authorized facility. Once a section of the existing seawall toe is removed, a casing will be installed down to bedrock.

One Turks Head Place, Suite 1200, Providence, RI 02903 • (401) 453-1200

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Once the casing is installed, a King pile(s) will be drilled and set with grout a minimum of 7' into bedrock. Once the king piles are set, steel sheeting will be driven to bedrock in between the piles. The process would continue in approximately 25' to 50' sections until the work is complete. This selected repair alternative reduces the encroachment of the seawall seaward by removing the existing seawall toe and keeping the repair within one (1) foot of the existing toe location. Below is a cross section of the proposed repair that graphically details the above description.



The work proposed in this application is listed as "Category B" in the Red Book 650- RICR-20-00-1 (see Section 1.1.6(F)). As such, Section 1.3.1(A) of the Red Book must be addressed in writing. Also, coastal feature must be shown, and, all property lines must be shown on at least one plan view'.

The work proposed in this application appears to require a variance(s) and/or a special exception(s) to applicable sections of the Red Book. Please address, in writing, the Variance criteria (Section 1.1.7) and/or the Special Exception criteria (Section 1.1.8) for each of the Red Book standards that your application does not meet.

As can be seen in the cross-sections the proposed maintenance meets the standard outlined in 650-RICR-20-00-1.3.1(G).6.a since the proposed work will not extend beyond the 1 foot seaward of the existing toe. The work proposed consists of necessary maintenance to keep a permitted structure from a potential of catastrophic failure. The application material will elaborate on the alternatives investigated, however over sheeting of walls is a typical repair solution that has been performed in Rhode Island in hundreds of locations. We respectfully





disagree that the proposed maintenance is a Category B, or requires a variance/special exception.

*The proposed new shoreline protection does not meet the standards of the 650-RICR-20-00-1.3.1.(G).6.(a). and would be considered new construction which would be prohibited on this shoreline (Type I, Conservation area) "The maintenance or repair of shoreline protection shall not extend beyond one (1) foot seaward of the existing toe of the structure. In most cases, expansion of the shoreline protection structure beyond one (1) foot seaward of the existing toe and one (1) foot vertical above the existing or shoreline protection elevation will be considered new construction."*

*As submitted the wall will extend (Cross Section D-D) 20.32" seaward (3" (start of sheetpile) + 17.32" (height of NZ26)). The design will need to be revised in order to meet the 12" requirement. Cross Section E-E has the same issue, the wall will sheetpile, this will extend 20.32" (3" + 17.32" height of NZ26).*

The proposed repair option has been chosen after careful consideration of the other alternatives specifically so that it will meet the standards for Maintenance and Repair of shoreline protection. The construction sequence discussed above and shown on the proposed cross-sections demonstrate this. It is our opinion that the design as shown does not need to be revised as it meets the 12" requirement.

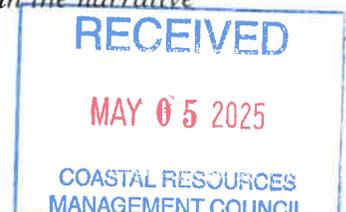
*Additionally, regarding the depth of sheetpile (NZ26), please give the design depth of scour on plans.*

The design scour depth is based on USACE recommended methodology. For this project the scour depth is -1' NAVD88 and the sheets shall extend 27' below that elevation in one location and -5.1 NAVD88 in the other location with the sheets a minimum of 12' below. This is also detailed on the proposed repair plans in the application.

*Other important details that need to be shown are cross-section of the existing wall and the W14 x132 and NZ26 layout/connection. Boring results need to be submitted to showing soil profile and the depth required to reach bedrock.*

These details will be added to the project plans, including the boring data as part of the application resubmittal.

*Also plans state the King Pile (W14 x 132) will be drilled and socketed, please address construction methodology. In particular, what is the extent of excavation required, what construction equipment will be utilized and where equipment will be sited. There should be no impedance to the level of lateral public access existing before, during and after construction (See reference below regarding public access). Any excavation, especially for the drilling and Pocketing (will these be grouted?) of the King Piles will most likely require that lateral public access during and/or after construction remain at its existing level of access. This proposed wall will now further encroach into public trust and will further impede lateral access. This must be addressed through constructing a walkway or some other method that safely allows for public access along this shoreline. All this information needs to be properly addressed in the narrative and plans.*





We addressed some of this in the complete description of the proposed work response, we will elaborate here for the King Pile. The toe of the existing structures will be removed in sections limited to 25 to 50 feet to allow a manageable open area. The existing toe of the wall will be removed by excavating the soils on top of the toe and then using a demolition hammer or saws to break the toe off of the existing structure. The area will then be clean of any debris and prepped from the installation of the king piles. The king piles will be installed by drilling within a 24" diameter cased hole. An excavator with a rock auger or drill rig will be utilized from the area in front of the wall or from the upland as needed. The work will be done at low water for access and visibility of the work being done. The machinery needed for the work will be stored in the upland area of the Dunes Club when the beach is not accessible due to high tide events. Once drilled, the king pile would be placed and grout would be installed to the top of the bedrock. Once cured the hole would be backfilled and the casing removed. The steel sheet pile sections would then be installed between the king piles using a vibratory hammer. The process will then repeat for the entirety of the proposed repairs. A temporary public access path will be provided along the upland area of the project site during construction. Upon completion of the project, the public access would continue along the beach as is currently provided. We have included the proposed public access plan during construction and this will also be included with the revised application submittal.

1. *Per 650-RICR-20-00-1.3.6(B)(1), "Any public access impacts associated with a proposed project should be avoided and minimized to the maximum extent possible."*
2. *Per 650-RICR-20-00-1.3.6(B)(4), "All structural shoreline protection facilities should be designed and constructed in a manner which does not reasonably interfere with the public's right to pass and re-pass along the shore."*

*The project, as proposed, does not demonstrate the negative impacts to public access have been minimized to the maximum extent possible.*

The proposed project minimizes negative impacts to public access to the maximum extent possible. Impacts to public access are temporary during construction. A temporary access path will be provided as depicted within the attached drawing such that the public can still have access along the beach. It is important to note that during high water events, access from the Town beach to the river is limited in front of 131 Boston Neck Road unless you wade through water. Access would be maintained and continue during non-high water events as currently exists. Additionally, there would be a significant adverse impact to the public access should repairs not be completed and failure was allowed to occur. Debris, upland soils, underground structures, and other upland amenities on this property would end up impacting the beach and create a significant hazard to the beach as well as the water body.

3. *Per 650-RICR-20-00-1.3.1(G)(5)(n), "Applicants shall provide appropriate on-site lateral shoreline access of a similar type and level to that which will be impacted by the proposed project. Applicants shall submit a plan detailing the lateral public access over or around the landward side of the proposed structure."*

RECEIVED

MAY 05 2025

COASTAL RESOURCES  
MANAGEMENT COUNCIL



*Lateral shoreline access may be negatively impacted by the proposed work. Applicant shall need to submit a plan which mitigates the negative impacts to lateral public access as part of this application.*

Please see the public access plan included in the drawing set.

- 4. Per 650-RICR-20-00-1.3.6(C)(5), "All public access plans should provide for long-term maintenance."*

*The public access plan will need to provide long-term maintenance of the proposed access pathway/route.*

No permanent impacts to public access are anticipated as part of this project. Access will remain as currently existing once the project is complete, limited during high water events and unrestricted during low water events.

- 5. Per 650-RICR-20-00-1.2.1(B)(2)(g), "Activities and alterations subject to Council jurisdiction contiguous to public parks, public beaches, public Rights of way to the shore, and conservation areas abutting Type 1 waters shall not significantly interfere with public use and enjoyment of such facilities. Where significant interference is found, the Council shall suitably modify or prohibit that alteration or activity."*

*The proposed work is contiguous to the Narragansett Town Beach and may significantly interfere with the public use and enjoyment of the beach.*

The work is contiguous to the Narragansett Town Beach but for the aforementioned reasons will not significantly interfere with the public use and enjoyment of the beach.

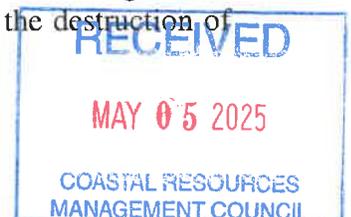
- 6. Per 650-RICR-20-00-1.3.6(A)(1): Protection and Enhancement of Public Access to the Shore*

*"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."*

Public access will be maintained. There will be no significant impacts if any to the access after construction and a temporary public access path will be installed during construction. In addition, by completing the proposed maintenance project the public access will be enhanced since the project would eliminate a potential adverse impact if the existing structures were to fail.

The Dunes Club and the adjacent private homeowners have a long history of providing and not impeding public access along the shore. In the case of the Dunes Club, public access has been provided and maintained along the shore all the way to the Narrows and also allows public access by foot and boat from the adjacent river and public use of the upland beach area near the Narrows.

It should be noted that the Dunes Club remains among the last remaining significant examples of historic structures along the Rhode Island shore, particularly along Narragansett Beach together with the Towers and the Coast Guard House, each of which are listed in the National Register of Historic Places. The existing Clubhouse dates to 1939, constructed following the destruction of





the 1928-29 clubhouse in the Hurricane of 1938. The existing Clubhouse, including the original seawall also built in 1939, are listed in the Register and subject to RI Historic Preservation Commission oversight and approval of alterations to existing features, as occurred for the prior CRMC approved modifications to the seawall undertaken in 1992.

The significance of the Dunes Club and seawall are acknowledged as worthy of protection under the Coastal Management Program regulations contained at 650-RICR 20-00-01. In Section 1.2.3 protection of historic structures adjacent to Type 1 waters are given high priority under the Program. Section 1.2.3.5 also states that shoreline protection of historic structures is allowed where "...necessary to protect a structure..." which is listed on the Register. Of note both adjacent homes are also eligible for listing in the Register and inclusion of maintenance of the seawalls fronting those properties is critical to protecting the Dunes Club.

Finally, it cannot be overstated that the shoreline scenic view along Narragansett Beach, from the Coast Guard House and Towers, along the town beach and its bathhouse facilities, the homes adjacent to the Club, and the Dunes Club itself, comprise an iconic scenic coastal vista representing the Rhode Island seashore which together are filmed, photographed, and frequently displayed and viewed on local television nightly news. This unique coastal vista is recognized as worthy of protection under Section 1.3.5. The proposed shoreline protection project will assure the unobstructed view from Ocean Road of this shore vista for those in vehicles and on foot is maintained and "... provide continuity with the existing scenic and historic character" of this coastal vista. Additionally, under Section 1.3.6 the proposed maintenance plan for the seawall along all three properties will collectively protect public access along the shore.

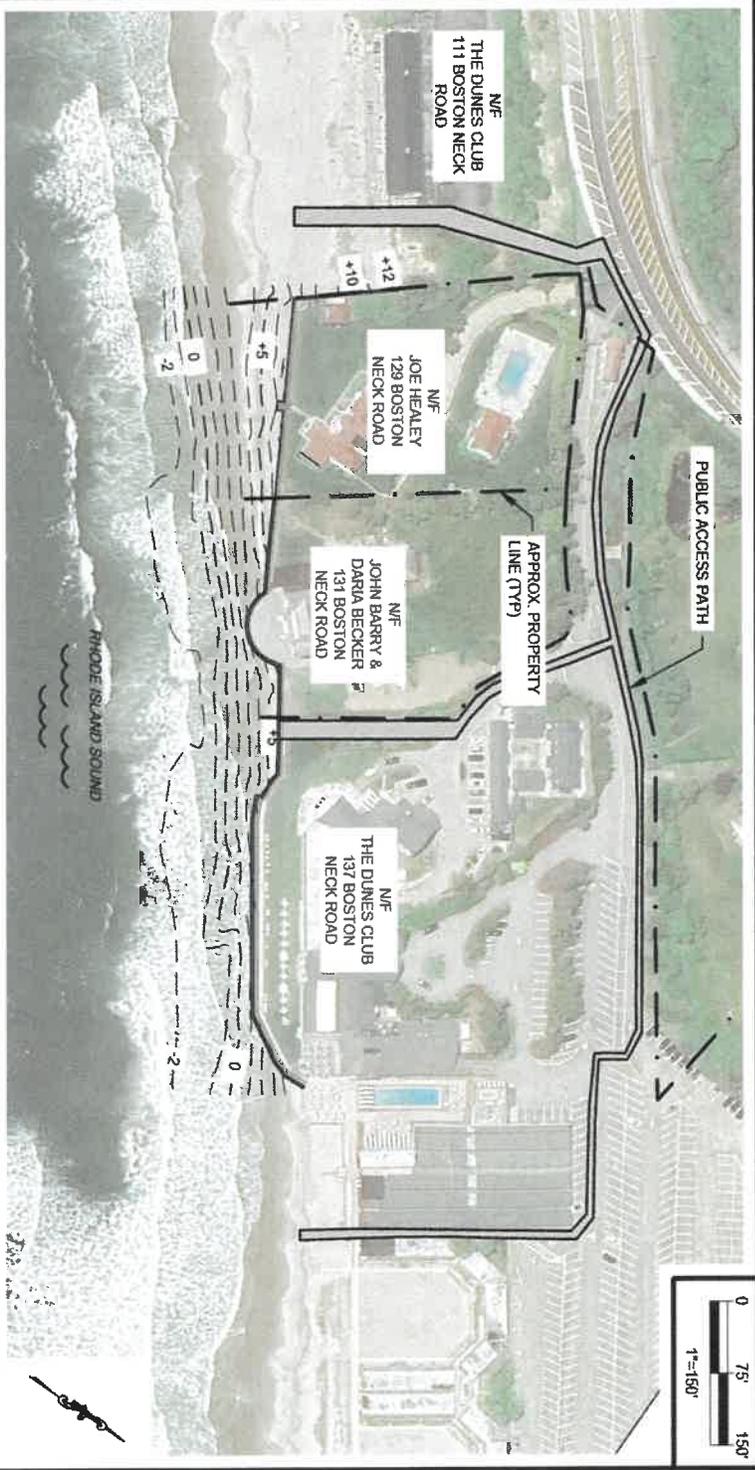
We look forward to your timely review of this Response. Should you have any questions concerning this Response, please contact the undersigned by email or by phone at (401)-453-1200 or 401-529-8967.

Very truly yours,

Sean O. Coffey, Esq.  
Partner

cc: Jeffrey Willis  
Danni Goulet





**NOTE(S):**  
 1. TEMPORARY PATH TO BE PROVIDED BY TEMPORARY FENCING OR CONCRETE BARRIER TO SEPARATE DRIVING AREAS FROM PUBLIC ACCESS PATH.

**TEMPORARY ACCESS PLAN**

 <b>RACE</b> COASTAL ENGINEERING 611 Access Road Stratford, CT 06615 Tel. 203-377-0663 racecoastal.com	<b>Prepared For:</b> THE DUNES CLUB 137 BOSTON NECK ROAD NARRAGANSETT, RI 02882-3106	<b>Project:</b> SEAWALL REPAIRS 129, 131, & 137 BOSTON NECK ROAD NARRAGANSETT, RI 02882-3106	<b>SEAL:</b>  NOT FOR CONSTRUCTION FOR REGULATORY REVIEW ONLY NOT VALID WITHOUT ENGINEER'S SEAL	<b>Date:</b> 03-19-2025 <b>Drawn By:</b> ZMW/CLW <b>Datum:</b> NAVD 88 <b>Proj'd No.:</b> 2024081	<b>Rev.:</b>  <b>Checked By:</b> ADS/MRR <b>Scale:</b> 1"=150' <b>Drawing No.:</b> 1 of 1
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