



November 26, 2025

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

RE: Application 2025-09-101 (Bruce H Moeckel 2015 Rev. Fam. Trst.)

Dear Director Willis:

Save The Bay, on behalf of our members and supporters, has reviewed the Coastal Resources Management Council's (CRMC) public notice File No. 2025-09-101, and offers the following comments. The applicant has proposed to construct and maintain a new structural shoreline protection facility (SPF) on a 50ft section of the property (585 Atlantic Avenue, Westerly, RI 02891) on Type 1 waters. Save The Bay respectfully objects to this application for the following reasons:

1. CRMC's rules prohibit shoreline protection facilities along Type 1 waters.

CRMC rules prohibit "the construction of new structures other than access ways, walkover structures, and beach facilities in setback areas" and "alterations to beaches adjacent to Type 1 and Type 2 waters. 650-RICR-20-00-01 §§ 1.2.2 (A)(2)(a) and (c). The dominant coastal features of the stretch of Atlantic Beach between Weekapaug Breachway to the east and Watch Hill Lighthouse to the west, is a coastal beach with dune, and is further defined by CRMC regulations as a developed barrier beach. 650-RICR-20-00-01§ 1.2.2 (B)(3).

2. CRMC's rules do not support the characterization that this shoreline is "manmade."

This application to construct a new shoreline protection facility on a barrier beach in Type 1 waters, where it would be otherwise prohibited, is based on the agency's prior determination that this stretch of beach is "manmade shoreline" and the "subject property" to be considered "infill." This determination is not consistent with CRMC regulations and does not align with conditions on this barrier beach.

CRMC regulations define "manmade shoreline" as shorelines (most commonly abutting Type 3,5 and 6 waters) "that are characterized by concentrations of shoreline protection structures and other alterations, to the extent that natural shoreline features are no longer dominant." 650-RICR-20-00-01 § 1.1.2 (A)(84). In addition, CRMC's regulations note that "manmade shorelines usually have a major impact on the appearance of the shore [and] interfere with public access to and along the coast...." 650-RICR-20-00-01 § 1.2.2 (F). Geospatial

analyses from RIDEM's Spring 2025 aerial imagery show that approximately 80% of this shoreline is characterized by a coastal/barrier beach with dunes that is free from structural shoreline protection facilities. Further, 100% of the subject shoreline still maintains ocean-fronting beach as the dominant natural coastal feature, providing lateral public access along the shoreline. For these reasons, Save The Bay objects to the agency's characterization of this stretch of shoreline as "manmade" as it defies logic and is inconsistent with CRMC's rules and the conditions present at this barrier beach.

Further, characterizing this portion of the barrier beach as "manmade" could lead to incremental hardening to the east and west of the subject site. If CRMC permits the proposed new hardening of this shoreline, inevitably, other landowners along this shoreline will look to CRMC to install shoreline protection facilities to combat the certain increase in erosion and beach scouring caused by adjacent hardening, and can then potentially rely on the characterization of this section of the beach as "manmade" to undermine CRMC's prohibitions on coastal armoring on this Type 1 barrier beach. Currently, only 20% of the coastline between Watch Hill Lighthouse to the west and Weekapaug Breachway to the east is characterized by presumably pre-act walls—some of which, including the subject site, have been built up beyond what is typically allowed via maintenance permits (source: Geospatial analyses from RIDEM's Spring 2025 aerial imagery). Labeling this section of shoreline as "manmade" will likely increase hardening, impound sand, increase erosion and decrease public access along this sandy beach habitat.

3. The proposed shoreline protection facility does not protect a structure integral to the primary structure on the property.

CRMC regulations prohibit the use of hybrid or structural shoreline protection to protect undeveloped land or structures not integral to the primary structure. 650-RICR-20-00-01 § 1.3.1 (G)(3)(b). The primary structure on the property is fronted and flanked by coastal armoring. The new wall is proposed to the east of the primary structure, with no structure behind the proposed wall (source: Geospatial analyses from RIDEM's Spring 2025 aerial imagery). Because of this, a wall should be prohibited from being constructed at this site.

Save The Bay appreciates the opportunity to comment on this application and urges the Council to prohibit the installation of a new sea wall on this site for the reasons outlined above.

Thank you for your consideration.

Sincerely,



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