



Name: Bruce H Moeckel 2015 Rev. Fam. Trst.  
CRMC File No.: 2025-09-101  
Staff Report



STATE OF RHODE ISLAND  
**COASTAL RESOURCES MANAGEMENT COUNCIL**  
STAFF REPORT TO THE COUNCIL

DATE: 3/2/2026  
TO: Jeffrey M. Willis, Executive Director  
FROM: Ross Singer

---

Applicant's Name:	Bruce H Moeckel 2015 Rev. Fam. Trst.
CRMC File Number:	2025-09-101
Project:	Structural shoreline protection infill on manmade shoreline
Location:	585 Atlantic Avenue; Westerly; Plat(s): 156; Lot(s): 12
Water Type/Name:	Type 1, Block Island Sound
Coastal Feature:	Developed barrier with coastal beach backed by rip rap revetment and sandy coastal berm within a manmade shoreline on a developed barrier
Plans Reviewed:	"Proposed Shoreline Protection" dated September 2025 and prepared by Joe Casali Engineering

---

**INTRODUCTION:**

The application requests Assent to construct a structural shoreline protection facility consisting of a rip rap revetment on an approximately 50ft unprotected section of the property. The subject property consists of a single family dwelling with a partial riprap revetment adjacent to Type 1 waters. The shoreline feature consists of an existing revetment extending approximately 100ft directly seaward of the dwelling, and an approximately 50ft section of unprotected sandy barrier. A continuous riprap boulder revetment extends approximately 720 feet east of the lot and 1,130 feet west protecting 11 dwellings in all. The contiguous stretch of hardened shoreline extends 0.35 miles with the exception of the 50 foot gap located on the applicant's property. The focused heavy wave energy and resulting erosion created by this gap creates a direct threat to the dwelling.

A Preliminary Determination was issued November 26, 2024; the Executive Director had determined that the circumstances of the site and the immediate surrounding area qualify the subject property to be considered infill on manmade shoreline, thus allowing for a request for structural shoreline protection.

Applications for structural shoreline protection facilities are considered Category B on manmade shorelines abutting Type 1 waters. One objection was received during the public comment period which questions whether the shoreline on the subject property is considered manmade shoreline.



**Figure 1 Aerial Image of Site**



**Figure 2 Image of existing gap in revetment**

**COMMENTS ON APPLICATION/APPLICABLE POLICIES, STANDARDS & ETC:**

<b>RICR Section Number</b>	<b>Section Title</b>	
1.2.1(B)	Type 1 Conservation Area	The Council's goal is to preserve and protect Type 1 waters from activities and uses that have the potential to degrade scenic, wildlife, and plant habitat values, or which may adversely impact water quality or natural shoreline types. Structural shoreline protection facilities are prohibited on Type 1 waters, however the existing revetments on this 0.35 miles of shoreline have been in place prior to the formation of the Council.
1.2.2(B)	Barrier Islands and Spits	The area is located in a developed barrier. Developed barriers are defined as areas in a barrier that contain houses and/or commercial structures that may contain surfaced roads and structural shoreline protection facilities. Structural shoreline protection facilities are not uncommon on developed barriers.
1.2.2(F)	Manmade Shorelines	<p>Manmade shorelines are characterized by concentrations of shoreline protection structures and other alterations, to the extent that natural shoreline features are no longer dominant. The predominant coastal feature of this 0.35 mile section of shoreline in coastal beach backed by riprap and boulder revetment. The natural shoreline feature of the coastal dunes are no longer dominant in this area.</p> <p>In light of an objection discussed below, a question was raised whether this shoreline feature should be considered manmade. See further discussion below.</p>
1.3.1(A)	Category B Requirements	The applicant submitted detailed responses of the 11 elements of the Category B application requirements. It is the opinion of Staff that these responses are complete and the requirements of this section of the RICRMP have been meet.
1.3.1(G)	Shoreline Protection	<p>Structural shoreline protection facilities are not prohibited on manmade shorelines abutting Type 1 waters.</p> <p>The proposed structure has been designed by a Professional Engineer and as such is certified to meet all applicable / required standards, including the additional Category B requirements. It is the opinion of staff that the proposal meets the policies and standards of this section of the RICRMP.</p>



**Figure 3- aerial photo of manmade shoreline**

### **COMMENTS ON OBJECTION:**

One objection dated November 26, 2025, was received from Save The Bay. The letter of objection from Save The Bay states the revetment should not be permitted on Type 1 waters. The objection argues that the dominant feature of the approximately 5 mile stretch of Atlantic Beach between Watch Hill Lighthouse and Weekapaug Breachway is coastal beach backed by dune; therefore, the isolated 0.35mile stretch of shoreline should not qualify as manmade. Furthermore, the objection states the coastal beach fronting the 0.35-mile hardened shoreline should be considered the dominant feature rather than the structural shoreline protection facilities. The objection from Save The Bay further states classifying the shoreline as manmade could lead to additional incremental hardening to the east and west of the subject site.

The letter of objection also states the application should additionally be denied because the new section of revetment would be placed to the side of the structure. Redbook section § 1.3.1 (G)(3)(b) prohibits the use of structural shoreline protection to protect undeveloped land or structures not integral to the primary structure. Save the Bay states that the primary structure on the property is already fronted by existing armoring and the additional section of revetment only protects the undeveloped portion of the property.

### **STAFF RESPONSE TO OBJECTION**

#### ***Regarding the dominant shoreline feature:***

In the objection letter, Save the Bay hinges part of their argument on the supposition that “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.”

Shoreline features are defined in the Red Book to include coastal beaches, barriers, coastal wetlands, coastal cliffs, bluffs, and banks, rocky shores, manmade shorelines, and dunes (§1.2.2). Across a single shoreline system, multiple shoreline features can, and do, occur.

The shoreline *feature*, rather than the entire extended shoreline, determines whether the activity proposed is permitted or prohibited. Cumulative effects are considered as part of the review, but for the

purposes of permitting, the controlling coastal feature for regulatory review must be more constrained to the immediate area.

Staff does not agree with Save The Bay's opinion that the entire 5-mile stretch of Atlantic Beach should be considered in making the determination whether the area qualifies as manmade shoreline. Along the stretch of Atlantic Beach between Weekapaug Breachway and Watch Hill, there are sections of developed barrier, undeveloped barrier, coastal headlands, coastal wetlands, coastal beaches, dunes, *and manmade shoreline*.

For the clarification of this specific project, the coastal feature of the proposed work is the coastal beach backed by sandy berm that is located within the 0.35mile coastal feature of manmade shoreline as an infill lot.

***Regarding the manmade shoreline determination:***

The objection letter further claims that the manmade shoreline feature determination "is not consistent with CRMC regulations and does not align with conditions on this barrier beach."

Save the Bay correctly notes that approximately 80% of the shoreline stretching from Weekapaug Breachway to Watch Hill contains coastal beaches backed by dunes. The letter is also correct in that a coastal beach feature does still exist in front of the revetments in the area of interest.

As noted above, the character of the entire shoreline from Weekapaug to Watch Hill is not relevant for the evaluation of this particular application. The regulations do not definitively define the size, area, or length of shoreline to quantify whether an area is defined as "manmade shoreline". While manmade shorelines are most commonly found on Type 3, 5, and 6 waters, there are several locations in Type 1 and Type 2 waters around the state where hardened shorelines are the dominant feature. Furthermore, there have been prior determinations of manmade shoreline on Type 1 waters in the past that focus on the immediate surrounding area rather than a much longer stretch of shore. Staff's determination for this application is consistent with previous determinations.

Staff agrees with the Executive Director's determination that this project is an infill lot on a manmade shoreline. The regulations define manmade shorelines as "those shorelines that are characterized by concentrations of shoreline protection structures and other alterations, to the extent that natural shoreline features are no longer dominant." Revetments are indeed concentrated in this area; the 0.35 mile stretch of shoreline includes shoreline protection facilities on 11 contiguous residential properties, including that of the applicant. Additionally, it is Staff opinion that the natural shoreline features and processes are no longer dominant. While the natural shoreline feature of the coastal beach is dominant seaward of the structural shoreline protection, the existing revetments have replaced the natural shoreline feature that would otherwise be the coastal dunes. The existing revetment on the applicant's parcel, in conjunction with the adjacent neighboring revetments, is actively inhibiting natural coastal processes. There is no natural dune present, nor are natural barrier rollover processes occurring.

Redbook section § 1.2.2 (F)(e) states that "the presence of isolated seawalls, bulkheads, and other similar structures does not constitute a manmade shoreline, as the term is used in this Program" It should be stressed that this is not an isolated property, but rather this is a small gap in the middle of what is otherwise a long stretch of hardened shoreline. It should also be noted that Staff would not support permitting additional shoreline protection facilities to the east or west of the 0.35mile stretch of manmade shoreline. In that case, as with this permit, Staff would evaluate the coastal features located in the immediate vicinity, and evaluate the existence and function of the beach, dune, and manmade features present on site.

***Regarding the protection of the primary structure:***

The final objection point claims the infilling of the lot with structural shoreline protection is prohibited, as the 50ft proposed section is not immediately in front of the residence. Regulations states “the Council shall prohibit the use of hybrid or structural shoreline protection to protect undeveloped land or structures not integral to the primary structure” (§1.3.1(G)(3)(b)).

It is Staff’s opinion that the intent of this regulation is to only permit shoreline protection structures on developed land where the primary structure is in danger. Staff would not support a structural shoreline protection facility on a vacant lot; additionally, Staff might not support a structural shoreline protection facility where the primary dwelling is located at a significant distance from the shoreline and in no danger due to coastal erosion.

That said, Staff considers the entire seaward lot frontage when permitting structural shoreline protection facilities and not just the area immediately in front of the dwelling. Staff does not agree with Save The Bay’s opinion that the existing revetment adequately protects the dwelling, and the continuation of the revetment only protects the land. The unprotected portion on the applicant’s lot is only 35 feet from the house’s foundation and only 16 feet away from the deck. The 50ft opening in the revetment creates the potential to focus wave energy, increase scour at the existing terminations of the revetments, and exacerbate erosion in very close proximity to the applicants dwelling.

**COMMENTS REGARDING REDBOOK SECTION 1.1.6(G) -SUBSTANTIVE OBJECTIONS:**

It is Staff’s opinion that evidence was not provided to demonstrate that the objections are substantive as defined by this section, and offers the following regarding specific areas of this section:

- 1.6.1(G)(1)(a): “Loss of objector’s property”- The facility is located entirely within the property lines. All of the neighboring properties are armored with existing riprap revetments. The proposed structural shoreline protection infill would not significantly contribute to the loss of any adjacent properties.
- 1.6.1(G)(1)(b): “Evidence that the proposed alteration or activity does not meet all of the policies, prerequisites, and standards contained in applicable sections of this document” The objection challenges the definition of “manmade shoreline”. If the location is not considered manmade shoreline, then the activity would not properly meet the policies, prerequisites and standards of the program. However, it is Staff’s opinion that the objection does not provide sufficient evidence that the program standards are not met. The executive director has determined that the shoreline feature is manmade, and Staff has provided sufficient details in the above discussion that verify all policies, prerequisites, and standards of the program have been met.
- 1.6.1(G)(1)(c): The objection does not challenge that the project has the potential of significant impacts to the coastal environment. All structural shoreline facilities have the potential to impact sediment deposition and erosion, scenic value, and public access; however, since this project is an infill on manmade shoreline the project does not contribute to additional harmful effects caused by the already hardened shoreline.

Name: Bruce H Moeckel 2015 Rev. Fam. Trst.

CRMC File No.: 2025-09-101

Staff Report

**CONCLUSION:**

The Executive Director has determined that the location is located within a manmade shoreline, and it is also the opinion of Staff that the shoreline fits the description of manmade shoreline in that it is characterized by a significant concentration of contiguous shoreline protection structures.

Staff does not object to infilling the rip rap revetment to close the gap located on the 50-foot portion of the Applicant's property. Connecting the revetment and infilling the 50ft gap is not likely to increase erosion on adjacent or downdrift properties due to the heavy concentration of structures already in the area. No adverse impacts are expected from the proposed 50ft infill.

Furthermore, it is Staff's opinion that the construction of the shoreline protection facility does not constitute a significant expansion of the manmade shoreline and does not pose a significant negative environmental impact.

Based on the above, there are no engineering objections to the project as described. Should the Council vote to approve the application, standard structural shoreline protection stipulations will be prepared.

Signed \_\_\_\_\_ Staff Engineer



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.

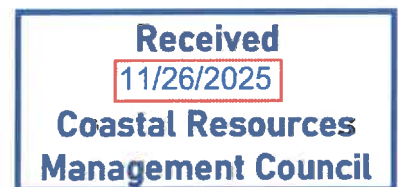
Save The Bay appreciates the opportunity to comment on this application and urges the Council to prohibit the installation of a new sea wall on this site for the reasons outlined above.

Thank you for your consideration.

Sincerely,



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



**CHERENZIA & ASSOCIATES, LTD.**  
 1000 West 10th Street  
 Suite 100  
 Westbury, Rhode Island 02891  
 Phone: 401-848-8100  
 Fax: 401-848-8101  
 www.cherenzia.com

Environmental & Engineering  
 Civil Engineering  
 Surveying & Mapping  
 Land Use Planning  
 Environmental Impact  
 Environmental & Engineering

**LOCATION MAP**

**PLAN REVISIONS**

NO.	DATE	DESCRIPTION	BY	CHK

ISSUED AS NOTED  
 BY: CAROL MOECKEL  
 CA JOB #211017-1  
 DATE: JUNE 8, 2024

DESIGNED BY: JF  
 CHECKED BY: MAC

**EXISTING CONDITIONS PLAN**

**ORTHOMOSAIC AERIAL PHOTOS**

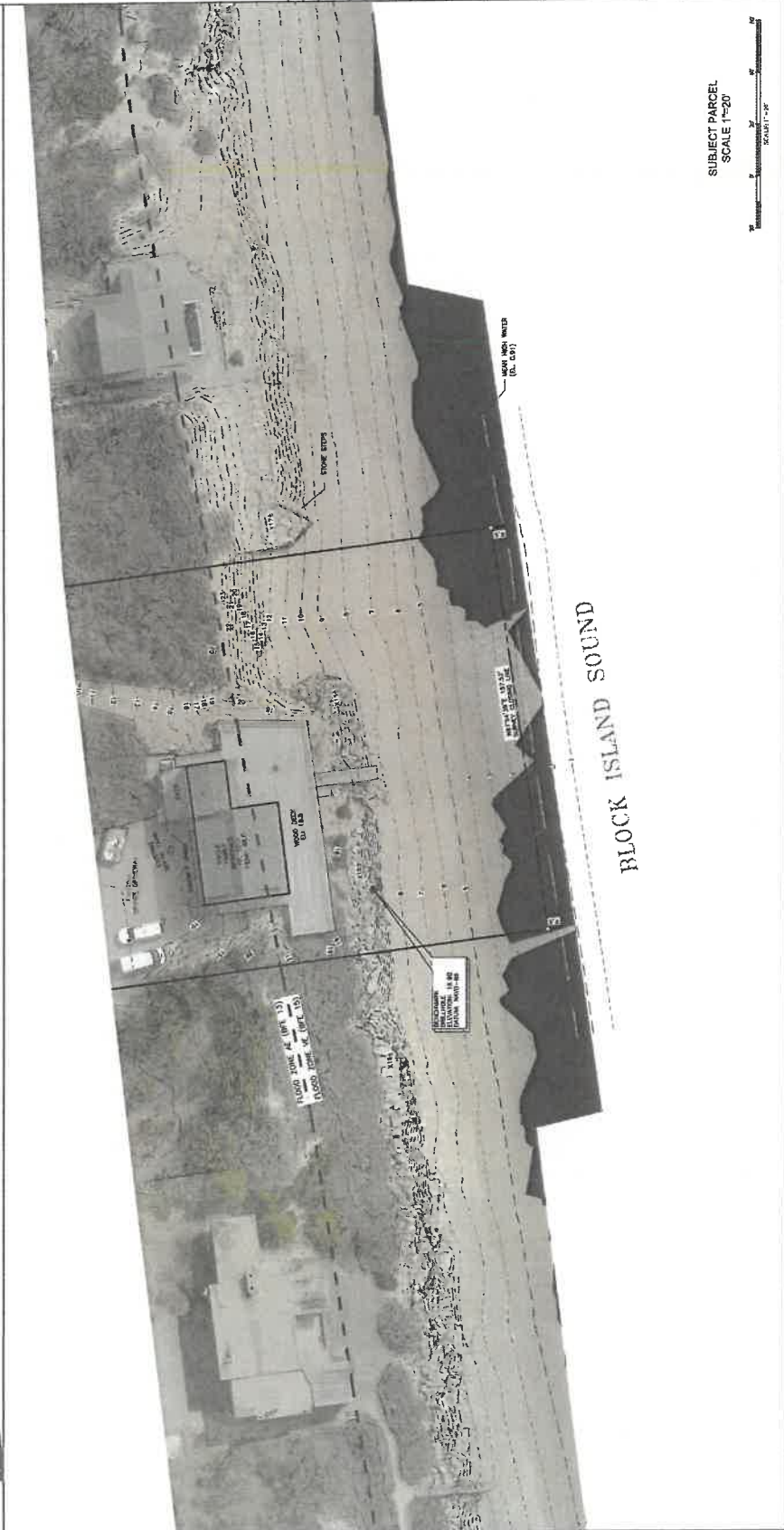
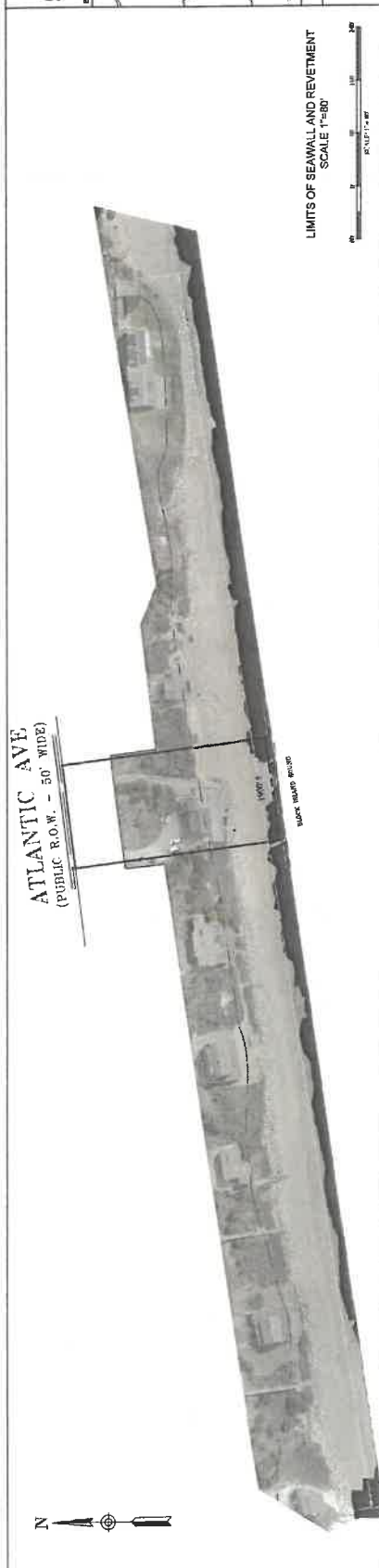
SEE ATLANTIC AVE  
 FOR SETBACKS  
 WESTBURY, RHODE ISLAND

PREPARED FOR:  
 CAROL MOECKEL

MARK A. CASTELLANOS  
 No. 2811  
 PROFESSIONAL  
 LAND SURVEYOR

**SV-2**

SHEET 2 OF 2

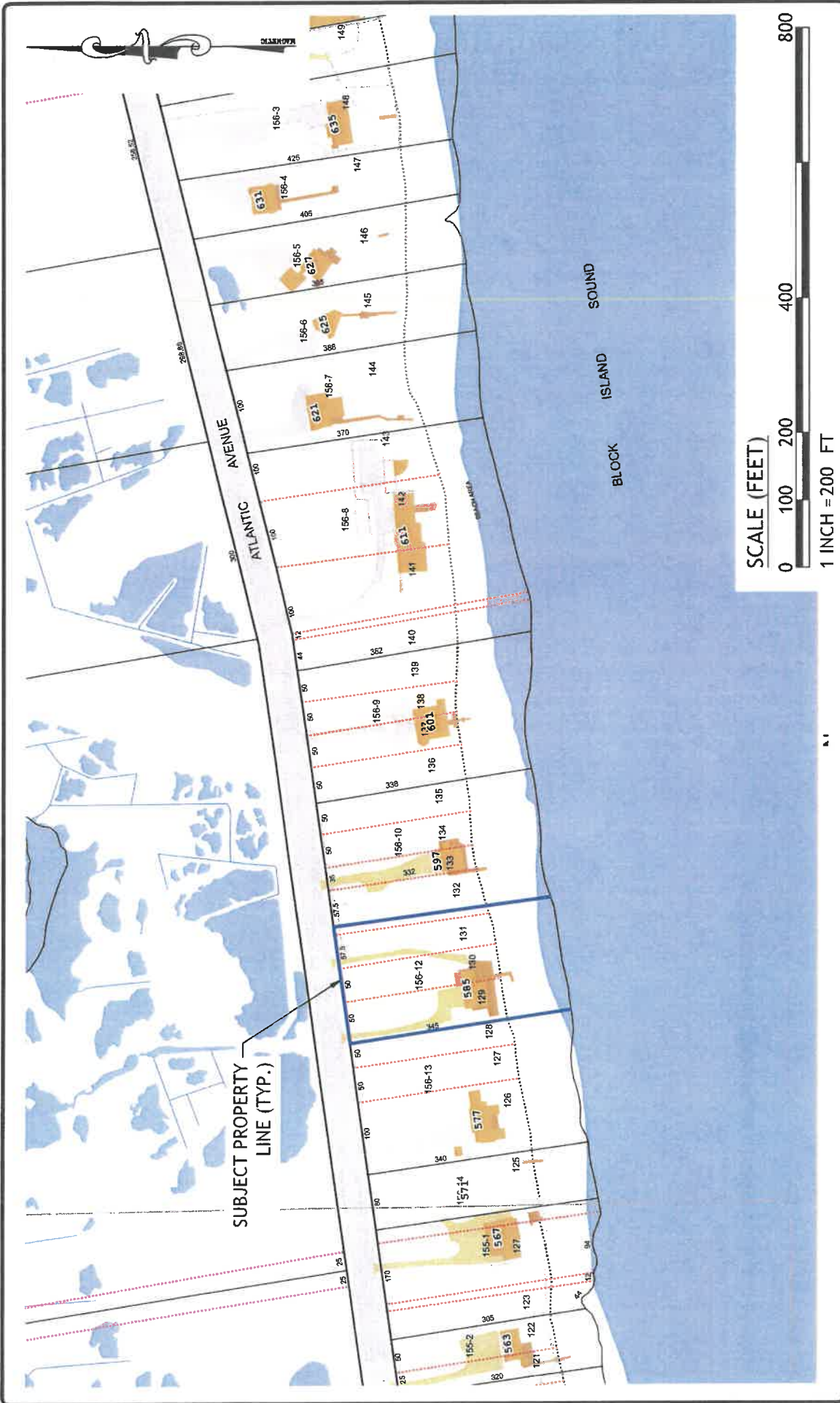












**JCE**  
JOE CASALI ENGINEERING, INC.  
CIVIL - SITE DEVELOPMENT - TRANSPORTATION  
DRAINAGE - WETLANDS - ISDS - TRAFFIC - FLOODPLAIN  
300 POST ROAD, WARWICK, RI 02888  
(401) 544-1300 INTL(404)1317FAX WWW.JCEONLINE.COM

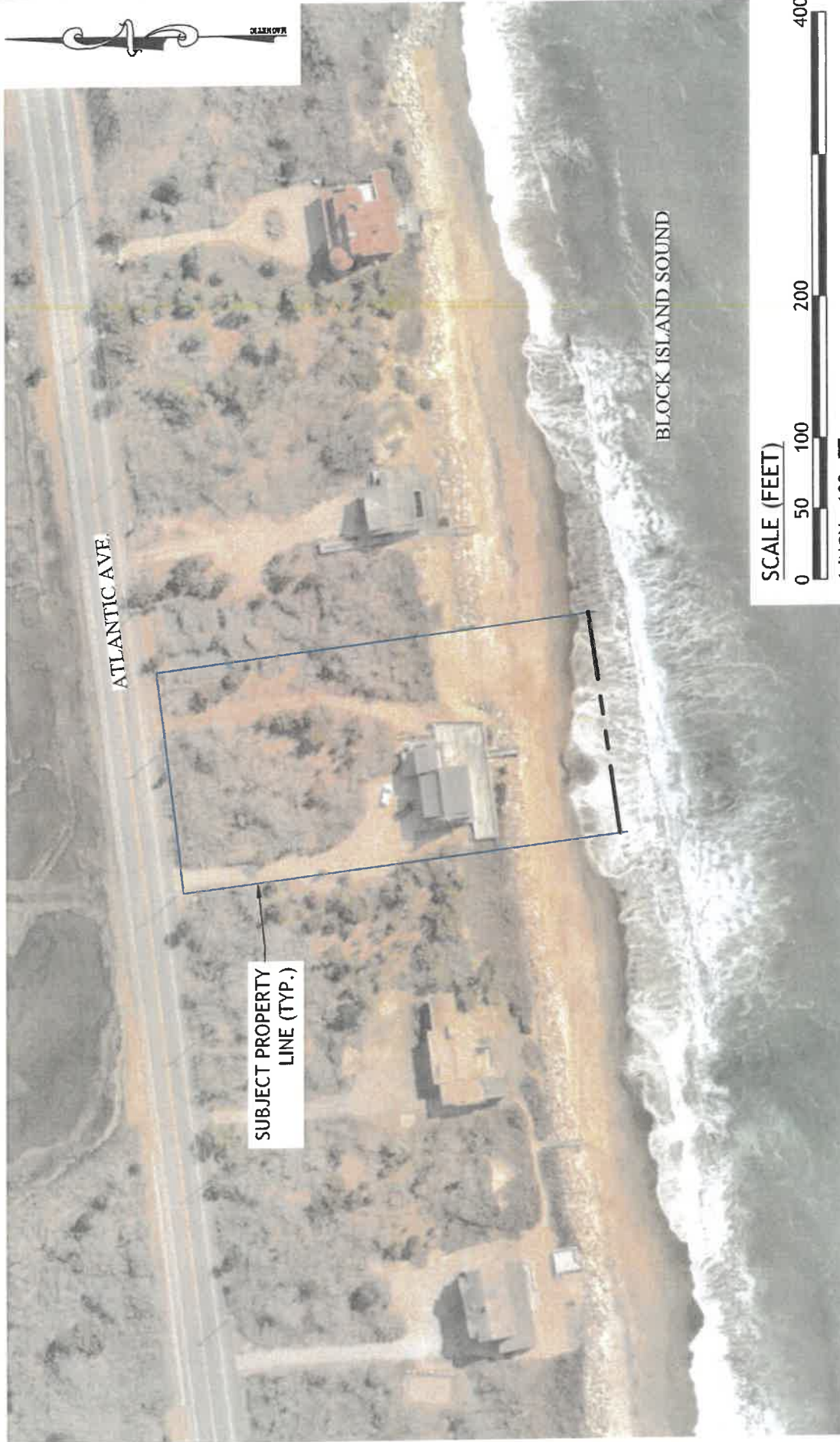
**RECEIVED**  
**9/24/2025**  
**COASTAL RESOURCES**  
**MANAGEMENT COUNCIL**

**PROPOSED SHORELINE PROTECTION**  
585 ATLANTIC AVENUE  
WESTERLY, RHODE ISLAND  
AP 156, LOT 12

NO.	DATE	DESCRIPTION

DESIGNED BY: DRD  
CHECKED BY: JEC  
DATE: SEPT. 2025  
PROJECT NO: 25-69

PRELIMINARY, NOT FOR CONSTRUCTION  
**PORTION OF ASSESSOR'S PLAT MAP 156**  
**SHEET 1 OF 1**



REVISIONS: NO.	DATE	DESCRIPTION

DESIGNED BY: DRD	DRAWN BY: SEP	CHECKED BY: JAC	DATE: SEPT. 2025
PROJECT NO: 25-65			

PRELIMINARY, NOT FOR CONSTRUCTION

**AERIAL MAP**

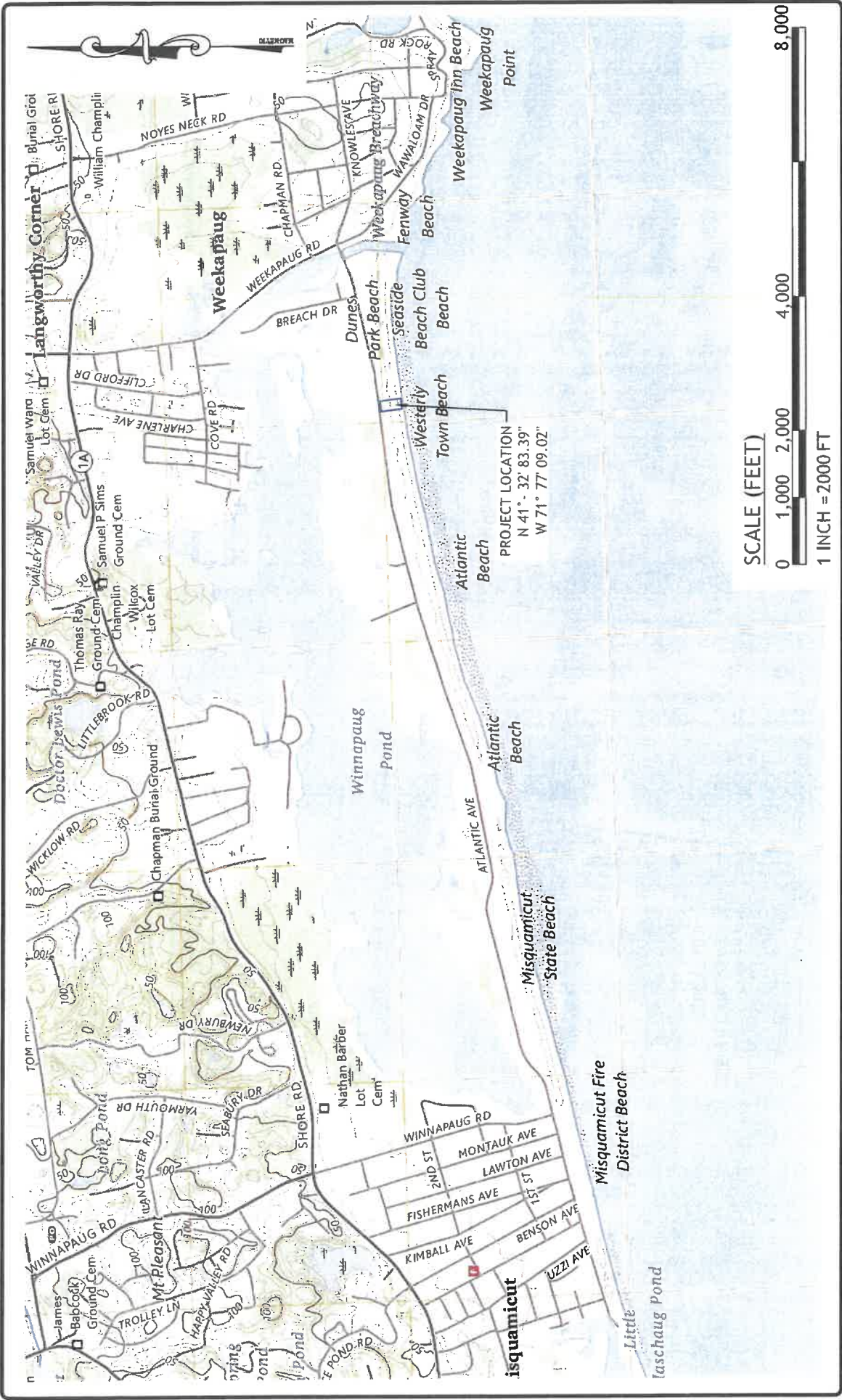
**SHEET 1 OF 1**

**PROPOSED SHORELINE PROTECTION**  
 585 ATLANTIC AVENUE  
 WESTERLY, RHODE ISLAND  
 AP 156, LOT 12



**JCE**  
 JOE CASALI ENGINEERING, INC.  
 300 POST ROAD, WARWICK, RI 02888  
 DRAINAGE - WETLANDS - ISDS - TRAFFIC - FLOODPLAIN  
 CIVIL - DEVELOPMENT - SURVEYING - LAND  
 (401) 846-1800 (401) 846-3137 FAX WWW.JOECASALI.COM

0:\25-05-Civil-1625001-V-3D-585-Atlantic Ave [working.rvt], dwn, Sep. 19, 2025 9:17 am



PROJECT LOCATION  
 N 41° 32' 83.39"  
 W 71° 77' 09.02"

SCALE (FEET)  
 0 1,000 2,000 4,000 8,000  
 1 INCH = 2000 FT



**JCE**  
 JOE CASALI ENGINEERING, INC.  
 CIVIL SITE DESIGN AND CONSTRUCTION  
 DRAINAGE DESIGN, EROSION CONTROL DESIGN  
 3000 POST ROAD, WARWICK, RI 02888  
 (401) 866-1300 (401) 866-1313 FAX WWW.JCECORP.COM

RECEIVED  
 9/24/2025

COASTAL RESOURCES  
 MANAGEMENT COUNCIL

**PROPOSED SHORELINE PROTECTION**  
 585 ATLANTIC AVENUE  
 WESTERLY, RHODE ISLAND  
 AP 156, LOT 12

NO.	DATE	DESCRIPTION

DESIGNED BY: DRD  
 DRAWN BY: SEP  
 CHECKED BY: JAC  
 DATE: SEPT. 2025  
 PROJECT NO.: 25-65

PRELIMINARY, NOT  
 FOR CONSTRUCTION

**USGS  
 MAP**

**SHEET  
 1 OF 1**