

## Oliver Allamby

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**From:** Craig Wood <cwoodpws@gmail.com>  
**Sent:** Friday, August 1, 2025 4:27 PM  
**To:** Cstaff  
**Cc:** <nrpa@narrowriver.org>; Veronica Berounsky; James Dean Vogel, P. E.  
**Subject:** CRMC 2025-06-017  
**Attachments:** NRPA comment letter 20250731 final.pdf

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

**Categories:** Oliver

Please find attached NRPA's comments on the above referenced application. Best Craig

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Craig A. Wood  
70 Edgewater Road  
Narragansett, RI 02882  
401-447-3358  
[cwoodpws@gmail.com](mailto:cwoodpws@gmail.com)



# NARROW RIVER PRESERVATION ASSOCIATION

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

www.narrowriver.org ~ nrpa@narrowriver.org

July 31, 2025

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

RE: CRMC 2025-06-017

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 observations and comments based upon our review of the application materials, our previous Position Paper shared with the town and our membership in September of 2024, and continued discussions with multiple stakeholders:

- We greatly appreciate the efforts by the town and others to advance a short-term proposal to address concerns over safe navigation and water quality. These concerns are shared by the NRPA Board of Directors and our membership. The NRPA Board of Directors has increasingly heard from our membership who have concerns about shoaling at the mouth and lower river reaches, particularly following storms over recent winters. Dune erosion, storm overwash, and longshore sediment transport from the Narragansett Town Beach have all contributed to the recent sedimentation inside the river mouth. We remain committed to working with the town and other stakeholders to advance a well-designed dredging program that improves recreational safety and bolsters coastal resiliency over the long-term.
- Shoaling at the river mouth (formation of tidal deltas) is a natural process that will continue after the initial dredging concludes. The decision to dredge the river mouth should therefore be made with full understanding that the action will require periodic re-dredging to maintain the improvements. To inform future maintenance dredging, we suggest the permit approval include a clear articulation of triggers to determine when re-dredging is warranted.

The application narrative states

*Dredging within The Narrows may cause potential adjustment of the Mean High Water (MHW) levels in the upper portions of the Narrow River adjacent to the USFWS' salt*

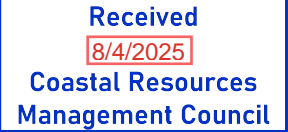




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*marsh restoration project. It is unknown whether these impacts will affect the existing salt marsh.*

The application also quotes the Narrow River Special Area Management Plan (SAMP) as follows,

*It would not harm the River if its flood-tidal delta was dredged periodically and the sand replaced on the Narragansett Beach. Boat navigation in the lower Narrows would be enhanced and no habitat changes would occur north of the Sprague Bridge, a major choke point. Narragansett Town Beach would be the logical site for beach replacement using flood-tidal delta sand.*

At the time of drafting the SAMP it was a commonly held belief that the Sprague Bridge was a major choke point limiting normal tidal exchange upstream of this point. This theory has been disproven by the more recent hydrodynamic modelling completed under the direction of the CRMC (*Swanson C., M. Spaulding and A. Shaw. August 2016. Final Report Impact of Dredging the Lower Narrow River on Circulation and Flushing in the Narrow River*). This modelling demonstrated the removal of sand from the mouth can influence both high and low tide levels upstream of Sprague Bridge. Based on this knowledge,

NRPA recommends that the CRMC consider during the approval process the propriety of conducting pre and post-dredging water surface monitoring, extending from 100 yards upstream of Sprague Bridge and 100 yards beyond the mouth of the river, to better understand the effects of this dredging on water levels and circulation, and to assess the success and feasibility of future maintenance dredging efforts.

This data collection should occur over a minimum of a complete lunar cycle. In recognition of the dynamic nature of the system and coastal storms, the required post-dredging bathymetric and beach/dune survey should be repeated at regular intervals. This information would aid in the potential revisions to the dredging design in future years to maximize the design life of navigation and coastal resiliency improvements.

- As dune restoration is an important component of the project, a planting plan should be included with the CRMC approval and not left for the Contractor to develop at a future date.
- NRPA recognizes that sand removed from the mouth of the Narrow River is a public resource and the benefits derived from the re-use of this material to enhance the coastal resiliency should not influence existing property boundaries. This should be clearly addressed in the CRMC approval.



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NRPA looks forward to working with the town and all stakeholders during the initial dredging as well as future re-dredging to maintain the improvements over the long term. Thank you for the opportunity to provide comments.

Sincerely,

Craig Wood, sPWS #800

NRPA Vice President

[cwoodpws@gmail.com](mailto:cwoodpws@gmail.com)

**Received**

**8/4/2025**

**Coastal Resources  
Management Council**

## Oliver Allamby

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**From:** Jed Thorp <jthorp@savebay.org>  
**Sent:** Thursday, July 31, 2025 5:49 PM  
**To:** Cstaff  
**Subject:** Save The Bay comments re: Narrow River dredging, 2025-06-017  
**Attachments:** STB Comments - Narrow River Dredging - 2025-06-017.pdf

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

**Categories:** Oliver

Please see Save The Bay's attached written comments regarding CRMC application 2025-06-017.

Thank you.

Jed

**Jed Thorp** (he/him)  
Director of Advocacy  
401-272-3540 x104 (o) | 401-345-2659 (c)

**SAVE THE BAY®**

NARRAGANSETT BAY

     | [SAVEBAY.ORG](https://www.savebay.org)

Sent via electronic mail to: [cstaff1@crmc.ri.gov](mailto:cstaff1@crmc.ri.gov)

July 31, 2025

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



RE: CRMC Application: 2025-06-017

Director Willis,

Save The Bay, on behalf of its members and supporters, is pleased to submit the following comments regarding the Narrow River Proposed Dredging Project; CRMC Application: 2025-06-017.

Save The Bay (STB) has collaborated with US Fish and Wildlife Service's (USFWS) John H. Chafee National Wildlife Refuge staff for over 10 years on the restoration of tidal hydrology at multiple Refuge-owned salt marshes on the Narrow River in addition to an Audubon Society of Rhode Island (ASRI) parcel at the mouth of the Narrow River. The goal of these projects is to restore the hydrology of the marsh platform, which has been negatively impacted by legacy agricultural and mosquito control activities as well as accelerated sea level rise.

In 2024, STB helped the RI Department of Environmental Management (RIDEM) secure a National Fish and Wildlife Foundation (NFWF) America the Beautiful grant to conduct a hydrology restoration project at the USFWS salt marsh located south of Middlebridge Road and an additional ASRI-owned marsh located directly downstream of Sprague Bridge. These future restoration projects are in the design phase and are planned to occur in 2026.

Save The Bay is concerned that the proposed dredging of the Narrow River could have unanticipated negative effects on the water levels at the mouth of the river and its adjacent salt marshes, particularly an increase in the height of Mean High Water (MHW). An increase in MHW would result in a greater amount of time during which the marsh platform and associated vegetation would be submerged. This potential increased submergence could negatively impact the health and function of Narrow River's salt marshes which already suffer from waterlogging, causing marsh vegetation to become stressed and drown in place.

These salt marshes provide crucial nesting and foraging habitat for the threatened saltmarsh sparrow (*Ammodramus caudacutus*), whose populations have declined by 87% since 1998 (<https://www.fws.gov/species/saltmarsh-sparrow-ammodramus-caudacutus>) due to loss of marsh habitat resulting from human impacts and accelerated sea level rise. The saltmarsh sparrow is currently listed as an internationally endangered species under the International Union for Conservation of Nature (IUCN), and is currently being considered for federal listing under the Endangered Species Act (ESA). In salt marshes, like those along the Narrow River, saltmarsh sparrows build their nests within salt marsh grasses, at a particular height above MHW.

Specific to this proposed project, it is important to note that there is a known population of critically threatened saltmarsh sparrows using the Narrow River marsh system for breeding. This population is currently being monitored in coordination with RIDEM, USFWS, and STB. In site visits conducted by STB in July 2025 of the ASRI salt marsh parcels downstream of Sprague Bridge, saltmarsh sparrows are currently utilizing the low- and high-vegetated marsh zones - the very marsh zones that can become imperiled by increased water levels. Any increase to MHW would result in increased flooding of known sparrow nests and a loss of clutches of eggs, severely negatively impacting an already decreasing and threatened population.

Should proposed dredging of the Narrow River move forward, Save The Bay requests that a robust monitoring plan be developed with stakeholder input in advance of the work to ensure sufficient coverage and adequate time for data collection. Save The Bay further requests that this monitoring plan be implemented to collect quantitative data regarding any changes to MHW which, in turn, would negatively impact adjacent salt marsh habitats and the saltmarsh sparrow population that relies on them. Requiring comprehensive data aligns with CRMC's policy of evaluating new scientific evidence regarding impacts from climate change, including sea level rise. (See RI CRMC Rule 1.1.10 (A)(3).)

Save The Bay recommends the installation of water level loggers at the USFWS John H. Chafee National Wildlife Refuge marsh upstream of Sprague Bridge and the Audubon Society of Rhode Island's salt marsh to the south of Sprague Bridge to remain in place before, during, and after the proposed dredging to assess the effects of the dredging on the tidal range. Collecting water level data during this dredging cycle would provide useful information on the effects of the dredging on the MHW, could inform future adaptive management efforts, and could inform any future dredging of the mouth of the Narrow River. In addition, these data could also be used to validate modeling conducted by URI (Spalding, 2016) to better understand the hydrology of the river and refine future proposed dredging efforts.

Save The Bay has a considerable amount of longstanding knowledge of these properties and habitats, and our staff has experience with both these locations and the water level monitoring referenced above. Save The Bay would gladly continue to work with collaborating organizations and contractors hired to complete dredging to identify the best temporal range and locations for water level logger deployment. Save The Bay has extensive experience in determining optimal locations for the deployment of water level loggers, and are available to coordinate with any and all parties involved in the implementation of this project to obtain critically important data for the sake of future marsh and estuarine health,

integrated adaptive habitat management, the protection of biodiversity, and for the protection of species of critical concern.

We are available to discuss these recommendations, or other reasonable alternatives that meet the intended goals described above. Thank you for your consideration.

Sincerely,



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



End of 08-05-2025 M Sherman  
Email to K. Cross, E Bowe

## Oliver Allamby

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**From:** Schwaab, Karrie <karrie\_schwaab@fws.gov>  
**Sent:** Friday, July 25, 2025 1:03 PM  
**To:** Cstaff  
**Cc:** Harrington, Margaret E; Simmons, David; Miner, Meta L  
**Subject:** Comments for application file no. 2025-06-017 proposed dredge at the Narrow River  
**Attachments:** NarrowRiverDredge\_2025\_comments.pdf

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

**Categories:** Oliver

Rhode Island Coastal Resources Management Council  
Stedman Government Center - Suite 3  
4808 Tower Hill Road  
Wakefield, RI 02879-1900  
Delivered via email: cstaff1@crmc.ri.gov

RE: Application File No. 2025-06-017

Dear Coastal Resources Management Council,

John H. Chafee National Wildlife Refuge (Refuge), managed by the U.S. Fish and Wildlife Service (Service), is a stakeholder in the Narrow River Estuary. In reviewing the application 2025-06-017 by the Town of Narragansett, the Refuge provides the following comments and recommendations for the project.

The Refuge appreciates the Town's commitment to involving the Refuge and community partners in this proposed project. Dredging the mouth of the Narrow River is likely to impact each of the stakeholders differently.

Service staff have been working for nearly ten years with multiple states, scientists, and local partners to restore the important salt marsh habitat along the Narrow River. The Refuge has concerns about the unknown impacts the proposed project may have on the Mean High Water (MHW) levels in the Narrow River on the lands we are working to restore. Changes to the tidal hydrology of these marshes has the potential to impact marsh vegetation as well as imperiled wildlife including the saltmarsh sparrow. Saltmarsh sparrows nest on the Refuge and adjacent lands, and is currently under consideration for federal listing under the Endangered Species Act (ESA). To better understand the impacts to restoration efforts and sensitive wildlife, we recommend a requirement for the Town to establish a pre- and post-monitoring program to quantify any environmental changes from this proposed dredging project and help to inform future management decisions as additional dredging projects are proposed.

The Refuge also strongly recommends the Town continues to involve the abutting landowners, community partners, and scientists who have expertise in coastal geomorphology for input on this proposed project.

The Refuge, through a cooperative program with Rhode Island DEM, also monitors and manages federally threatened piping plovers and state threatened least terns nesting at the mouth of the Narrow River as part of our shorebird program. We previously provided detailed input on ESA and beach-nesting bird concerns associated with this project during a meeting on September 19, 2024 with Town of Narragansett staff and representatives from Foth Infrastructure & Environment. Those concerns include impacts to piping plover habitat resulting from placement of sand or construction of artificial dunes on existing nesting and feeding habitats, reduction in the size of the existing nesting habitat, and impacts to high-quality feeding areas along the river shoreline. Due to their federally-listed status under ESA, issues related to piping plovers need to be addressed by the applicant via a consultation with U.S. Fish Wildlife Service's New England Field Office as part of the process of obtaining an Army Corps of Engineers permit for dredging activities.

Thank you for the opportunity to provide comments.

Sincerely,

Karrie Schwaab  
Project Leader  
Rhode Island National Wildlife Refuge Complex  
50 Bend Road, Charlestown, RI 02813  
(o) 401-364-9124  
(c) 401-782-5373



**NATIONAL  
WILDLIFE  
REFUGE SYSTEM**





# United States Department of the Interior



## FISH AND WILDLIFE SERVICE

Rhode Island National Wildlife Refuge Complex  
50 Bend Road  
Charlestown, RI 02813

July 25, 2025

Rhode Island Coastal Resources Management Council  
Stedman Government Center - Suite 3  
4808 Tower Hill Road  
Wakefield, RI 02879-1900  
Delivered via email: [cstaff1@crmc.ri.gov](mailto:cstaff1@crmc.ri.gov)

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**7/25/2025**

**Coastal Resources  
Management Council**

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Sincerely,



Karrie Schwaab

Project Leader

Rhode Island National Wildlife Refuge Complex

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**7/25/2025**

**Coastal Resources  
Management Council**