



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

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