



February 17, 2012

Grover Fugate, Executive Director
Coastal Resources Management Council
Oliver Steadman Government Center
4808 Tower Hill Road
Wakefield, RI 02879

Re: Petition 2011-12-017 to change shoreline designation

The Rhode Island Chapter of the Surfrider Foundation would like to comment on the petition to change the shoreline designation of the Matunuck coastal area.

The Surfrider Foundation is an international, non-governmental environmental organization with 60,000 members working to protect our oceans, waves, and beaches. The Rhode Island Chapter of the Surfrider Foundation was founded in 1998 to represent the Foundation's Rhode Island membership and has been quite active in the areas of local water quality, public access, and outreach.

The Surfrider Foundation recognizes that beaches are unique coastal environments with ecological, recreational and economic value. The Surfrider Foundation further recognizes that beaches are a public resource and should be held in the public trust. As human activities and development in coastal areas increase, the need for preservation of beaches becomes ever more apparent.

The area of shoreline in question is one that the members of the Rhode Island Chapter of the Surfrider Foundation ("RISF") consider to be an exceptionally valuable natural resource; a resource that, every year, attracts thousands of local and out-of-state surf and fishing enthusiasts to the Matunuck shoreline. It is the position of the RISF that re-classification of the proposed 11 parcels from "coastal headlands, bluffs, and cliffs" to the less restrictive classification of "manmade shoreline" will have a direct effect on the integrity and adaptability of the beach environment. Although this change to the shoreline classification will not automatically allow new shoreline structures to be built, it is a critical step down a very slippery slope that will eventually lead to the hardened armoring of the entire Matunuck beachfront – the undeniable goal of the Town of South Kingstown.

Along the eastern most parcels (92-2:46, 92-2:47, and 92-3:1) there is already riprap armoring the eroding coast. The remaining eight parcels to the east however still fit the definition of a coastal headland as identified in the "Red Book" under section 210.4:

Coastal cliffs and bluffs are elevated land forms on headlands directly abutting coastal waters, a beach, coastal wetland, and rocky shore.

Further stated in section 210.4, alteration of that area is prohibited if there is "reasonable probability of causing or accelerating erosion or degrading a generally recognized scenic vista". Severe erosion has taken its toll on this area over the past several decades, most likely in part due to the existing seawalls to the west. Opening the door to further shoreline protection will ultimately cause the last section of the beach to disappear once and for all.

Through the weakening of the current shoreline classification, which will ultimately allow the area to be developed with hardened structures, the Council has not only gone against the CRMC mission to preserve and protect coastal resources, but they have favored the built environment over the coastal environment! This will inevitably set up a very negative precedent for our state's precious coasts. Matunuck, while perhaps the most visible community struggling with shoreline erosion, is by no means alone. If passed, the Council will be inundated with applications and requests to weaken the shoreline classification throughout the state.

The structures on the properties in question are NOT water dependent and are fortunate to have lasted as long as they have in such a high energy beach environment. As sea level rises and coastal storms become more intense, the built environment will be challenged. Saving threatened structures however, should not come at the cost of losing the resources that Rhode Islanders have come to love- our local beaches and ocean access. Nor should saving these structures come at a financial cost for all citizens and Rhode Island tax payers through the current involvement of TIP funding through the RIDOT.

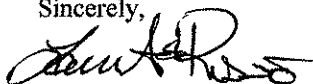
The scientific literature on the negative, snowballing effects of shoreline armoring is so voluminous that it need not even be repeated here. Indeed, CRMC's existing regulations prohibiting such activities are a testament to those very findings. CRMC also has direct access to one of the foremost experts in the area of coastal morphology and erosion in Dr. Jon Boothroyd of the University of Rhode Island's Graduate School of Oceanography who can easily recount the negative aspects of such hardened erosion control structures.

In fact, the science on the negative effects of shoreline armoring is so well settled that the applicant, Town of South Kingstown, makes no attempt to dispute it. Rather, the Town simply alleges that the change in shoreline classification (which everyone knows is intended to ease the way for an armoring project) is "necessary" to protect Town infrastructure. However, such an allegation is not only false, it is one that the Town makes with unclean hands after disregarding decades of warnings about erosion and the need for prophylactic measures. The Town of South Kingstown has had more than adequate time and warning to implement acceptable erosion control alternatives that could have prevented the current situation. The Town chose not to invest in these acceptable measures (largely for fiscal reasons) when there was time for them to work and instead chose to play an un-winnable game of "chicken" with the unstoppable force of the Atlantic Ocean.

RISF is genuinely sympathetic about the plight of the coastal property owners in Matunuck, many of whom are valued supporters of RISF. As stewards of the coastal environment, RISF's members understand more than most the feelings of loss being experienced by the property owners south of Matunuck Beach Road; however, the risk of loss is and always has been the dark flip-side of coastal property ownership – it is the price one pays for living in one of nature's most active environments. Nonetheless, RISF cannot shy away from its mission to support only scientifically and environmentally sound coastal erosion management practices. There are other solutions – solutions that CRMC has indicated that it will approve immediately (e.g. soft armoring utilizing "burritos") – and solutions that the Town of South Kingstown chooses to ignore (e.g. relocation of Matunuck Beach Road and its underlying infrastructure). These solutions require no reclassification of the shoreline.

In conclusion, the Rhode Island Chapter of Surfrider Foundation strongly opposes the town's request for a shoreline classification change. We believe that making changes, or setting up the framework to make changes to the natural environment along the shore will backfire and accelerate the erosion rate. There is no question that houses, business, and public infrastructure are losing their protective beach area. Unfortunately this is one of the inherent risks of living at the edge of the sea. Accelerating these processes should not come at the detriment of severely weakening the RI Coastal Resources Management Program.

Sincerely,



Surfrider Foundation
Rhode Island Chapter