

File: 0632-3.2

C: Parker
Furnell
Witt
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June 12, 2007

James Colter
Remedial Project Manager (Code OPNEEV)
Facilities Engineering Command, Mid-Atlantic
Naval Facilities Engineering Command
9742 Maryland Avenue
Norfolk, VA 23511-3095

RE: Stone Revetment Replacement Design 30 % Submission, Old Fire Fighter Training Area,
Naval Station Newport, Newport, Rhode Island

Dear Mr. Colter,

The Rhode Island Department of Environmental Management, Office of Waste Management has reviewed the Stone Revetment Replacement Design 30 % Submission; Old Fire Fighter Training Area dated May 1, 2007. Attached are comments generated as a result of this review.

The proposed design calls for the placement of a stone revetment over the existing beach and intertidal area. This new revetment would be considerably wider than revetments found elsewhere on Coasters Harbor Island and on the base. The Navy has not justified the need for this wider revetment, especially in light of the fact that narrow, standard revetments have proven to be effective at other locations on the base, which are subject to the similar wave action.

Covering the intertidal area with a revetment will destroy the existing beach environment and may adversely affect the eelgrass bed that abuts the site (changes in the hydrodynamics of the area if a wider revetment is installed). Further, it is not in concert with state regulations or policies that stipulate if a revetment is found necessary to protect structures the revetment shall be installed in such a manner as to avoid filling in coastal features or tidal waters. Therefore, the DEM does not support the revetment as proposed and any replacement revetment, if allowed, must stay within the footprint of the existing revetment.

If the Navy has any questions concerning the above, please contact this Office at 401-222-2797, ext. 7111.

Sincerely,

Paul Kulpa
Office of Waste Management

cc: Matthew DeStefano, DEM OWM
Richard Gottlieb, DEM OWM
Terry Walsh, DEM OWR
Ken Anderson, RI CRMC
Kymberlee Keckler, EPA Region I
Cornelia Mueller, NSN

**Comments on
Stone Revetment Replacement Design 30 % Submission
Old Fire Fighter Training Area**

**1. Section 2.1.5 CRMP Section 300.10 Filling in Tidal Waters, Removing or Grading of Shoreline Features.
Page 2-3.**

This section of the report contains the policies, standards and prohibitions discussed in Section 300.10. This section and a table must note the following: It is the councils policy to discourage and minimize the filling of coastal waters, and filling in Type 4 waters is prohibited unless the filling is minimized, alternatives have been evaluated and filling is deemed necessary.

**2. Section 2.1.6 CRMP Section 300.12 Coastal Wetlands Mitigation.
Page 2-3.**

Please add the following to this section. The CRMC determines whether disturbances associated with the approved construction or repair of protection facilities are minor.

**3. Section 2.4, RIDEM Section 401 Water Quality Certification.
Page 2-8, Paragraph 3.**

“There are no substantive requirements associated with the WQC that would directly affect the design of the revetment.”

Any work performed on the shoreline, dredging, filling in waters of the State, etc must meet the requirements and obtain approval from the Office of Water Resources before a water quality certificate can be issued. Therefore, please remove the statement that “There are no substantive requirements associated with the WQC that would directly affect the design of the revetment.” and state the following:

Work performed on the shoreline, dredging, filling in waters of the State, etc must meet the requirements and obtain approval from the RIDEM Office of Water Resources.

**4. Section 3.1, Description of the Shoreline Stabilization Design.
Page 3-1.**

Please be advised that the DEM does not support nor will it approve the revetment as proposed and any revised designed revetment, if allowed, must stay within the footprint of the existing revetment.



5. Section 3.2.4, Wetlands Disturbance and Restoration.
Page 3-5.

The report notes that disturbed wetlands will be restored on the site by backfilling with native materials. The proposal calls for the placement of a revetment in the intertidal zone. It will not be possible to restore the affected areas unless the revetment or capped area is installed below the existing grade of the beach and two feet of native material is brought in to bring the height back to the existing grade. Please indicate if this is the intent of the design. Please include a map delineating the location of the disturbed wetlands and the areas which will be restored.

6. Section 3.2.4, Wetlands Disturbance and Restoration.
Page 3-5.

The report states that restoration activities will take place if needed in the eel grass beds. The proposal calls for establishing a revetment in an area where one does not currently exist. Please be advised that this may significantly alter the hydrodynamics of the site, which may ultimately result in the demise of the eel grass beds. If this occurs RIDEM may require replacement of the eel grass beds.

7. Section 3.2.4, Wetlands Disturbance and Restoration.
Page 3-5.

Please provide the information gathered from a hydrodynamic study that addresses potential impacts to the adjacent eel grass beds from the proposed revetment. Please also advise RIDEM if this information was taken into account for the 30 % Design.