

**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF COMPLIANCE & INSPECTION**

IN RE: John Melucci

**FILE NO.: OCI-FW-13-124
X-ref C13-0081**

NOTICE OF VIOLATION

A. Introduction

Pursuant to Sections 42-17.1-2(21) and 42-17.6-3 of the Rhode Island General Laws, as amended, (“R.I. Gen. Laws”) you are hereby notified that the Director of the Department of Environmental Management (the “Director” of “DEM”) has reasonable grounds to believe that the above-named party (“Respondent”) has violated certain statutes and/or administrative regulations under DEM's jurisdiction.

B. Administrative History

On 15 November 2013, DEM issued a Warning Letter to Respondent for one of the violations that is the subject of this Notice of Violation (“NOV”). The letter advised Respondent of the actions required to correct the violation. On 3 December 2013, Respondent spoke with a DEM agent regarding the letter. Respondent agreed to comply with the letter by applying to DEM for a wetlands permit. On 3 April 2019, Respondent spoke with a DEM agent during an inspection of his property in response to a new complaint. Respondent was advised that he failed to comply with the letter and that new violations were present. Respondent stated that he submitted documents to DEM and never heard back. DEM’s agent stated that there was no record that he applied to DEM for a wetlands permit and advised him to resubmit his documents to DEM. Respondent stated he would do so the following week. As of the date of the NOV, Respondent has failed to apply for a wetlands permit or provide any information to DEM regarding the new violations.

C. Facts

- (1) The property is located at 27 Sidney Street, Assessor’s Plat 21, Lot 18 in the Town of Smithfield, Rhode Island (the “Property”).
- (2) Respondent owns the Property.
- (3) On 21 August 2013, DEM received a complaint regarding construction of a wall on the Property along Georgiaville Pond (the “Pond”) without a permit.

- (4) In response to the complaint, DEM reviewed aerial photographs, which revealed the following:
 - (a) A wall and dock were constructed within the Pond; and
 - (b) Clearing, grading and filling occurred within the 50-foot perimeter wetland associated with the Pond (the “Perimeter Wetland”)
- (5) On 28 March 2019, DEM received a complaint regarding placing soil and gravel into the Pond from the Property.
- (6) On 3 April 2019, DEM inspected the Property in response to the complaint. The inspection and subsequent review of aerial photographs from 2013 to present revealed the following:
 - (a) A boat ramp was constructed within the Pond; and
 - (b) Creating and maintain a lawn and constructing a fenced in area off the southern building within the Perimeter Wetland.
- (7) The activities described in subsections C(4)(a) and C(6)(a) above resulted in the alteration of approximately 165 linear feet (wall length) and 400 square feet (dock and boat ramp) to the Pond.
- (8) The activities described in subsections C(4)(b) and C(6)(b) above resulted in the alteration of approximately 6,500 square feet of the Perimeter Wetland.
- (9) The activities described in subsections C(4) and C(6) above are not exempt in accordance with Part 1.6 of the Rhode Island Code of Regulations titled *Rules and Regulations Governing the Administration and Enforcement of the Fresh Water Wetlands Act (250-RICR-150-15-1)* (the “Wetland Rules”).
- (10) Respondent did not receive a permit from DEM to alter the freshwater wetlands as described in subsections C(4) and C(6) above.

D. Violation

Based on the foregoing facts, the Director has reasonable grounds to believe that you have violated the following statutes and/or regulations:

- (1) **R.I. Gen. Laws Section 2-1-21** – prohibiting activities which may alter freshwater wetlands without a permit from DEM.
- (2) **Wetland Rules, Part 1.5(A) [formerly Rule 5.01]** – prohibiting activities which may alter freshwater wetlands without a permit from DEM.

E. Order

Based upon the violations alleged above and pursuant to R.I. Gen. Laws Section 42-17.1-2(21), you are hereby ORDERED to:

- (1) **IMMEDIATELY** cease from further alterations of any and all freshwater wetlands on the Property.
- (2) Restore the freshwater wetlands by completing the following actions:
 - (a) Prior to the initiation of any restoration activities, install a proper bottom-weighted silt curtain just outside of the bottom of the existing (unauthorized) masonry retaining wall, to prevent the transport of sediments into other portions of the Pond;
 - (b) Remove the masonry retaining wall from the shoreline of the Pond and the Perimeter Wetland, except for that portion extending 70 feet southerly from the northern property boundary (this portion was pre-existing), along with associated stairs and dock improvements;
 - (c) Remove the unauthorized boat ramp and launch from the Pond and the Perimeter Wetland, including any unauthorized fill material and associated improvements;
 - (d) Following removal of all unauthorized improvements from the Pond, install a continuous uninterrupted line of soil erosion and sediment controls (staked haybales, silt fence, or an otherwise suitable substitute), as directed by DEM, along the toe of the remaining disturbed slope, between the disturbed areas and the Pond. These soil erosion and sediment controls must be regularly inspected and properly and continually maintained (and replaced, if necessary) during and following the completion of the required wetland restoration, and until such time that all the surrounding areas are entirely properly stabilized. At the discretion and direction of DEM, additional soil erosion and sediment controls must be installed on-site, as deemed necessary, to protect any and all freshwater wetlands;
 - (e) Create a stable (2:1 maximum) slope extending landward from the Pond edge. This slope must be covered with plantable soil (6-inch minimum), seeded with an appropriate wildlife conservation seed mixture and covered with a mat of spread (loose) straw mulch, which is free of any contaminants that could promote the spread of invasive plant species. At the discretion and direction of DEM, a proper biodegradable erosion-control matting material (e.g., jute mesh or excelsior matting) must be installed on the slope to provide immediate stabilization;

- (f) Remove the unauthorized fence and enclosure area situated to the west of the existing southern-most (garage) structure, along with all equipment and other contents from the Perimeter Wetland;
- (g) As directed by DEM, remove or adequately scarify those portions of the lawn within the Perimeter Wetland that were not previously existing, seed (or over-seed) the affected areas with an appropriate wildlife conservation seed mixture, and cover all disturbed surfaces with a mat of spread (loose) straw mulch, which is free of any contaminants that could promote the spread of invasive plant species;
- (h) As directed by DEM, plant those disturbed/altered portions of the Perimeter Wetland situated to the west of the existing structures (i.e., between the Pond edge and the west side of the structures), as well as the entire area situated to the south of the southern-most (garage) structure, with trees and shrubs, as follows:

Balled and burlapped or transplanted tree species must be planted in an interspersed fashion, 15 feet on center, 4 feet tall after planting, throughout the areas defined above. Tree species must include an equal distribution of at least 2 of the following selections:

Box elder, *Acer negundo*
 White ash, *Fraxinus Americana*
 White oak, *Quercus alba*
 Northern red oak, *Quercus rubra*
 Black birch, *Betula lenta*
 American beech, *Fagus grandifolia*

Balled and burlapped or transplanted shrub species must be planted in an interspersed fashion 5 feet on center, 3 feet tall after planting, within that area extending 15 feet landward of the top of the newly established slope and the interior edge of the remaining portion of the retaining wall. Shrub species must include an equal distribution of at least 3 of the following selections:

Gray (stiff, red panicle) dogwood, *Cornus foemina racemosa*
 Arrowwood (southern), *Viburnum dentatum*
 American cranberrybush, *Viburnum trilobum*
 Highbush blueberry, *Vaccinium corymbosum*
 Sweet pepperbush, *Clethra alnifolia*
 Winterberry, *Ilex verticillata*
 Witchhazel, *Hamamelis virginiana*

In addition, balled and burlapped red maple (*Acer rubrum*) trees must be planted in a straight line, 10 feet on center, 5 to 6 feet tall after planting, along the entire Pond edge, at the top of the newly established slope and along the interior limits of the remaining portion of the retaining wall;

- (i) If any of the required plantings fail to survive at least 2 full growing seasons from the time they have been planted, you shall be responsible for replanting and maintaining the same plant species until such time that survival is maintained over 2 full growing seasons; and
- (j) Restoration must be completed on or before **31 October 2020**.

F. Penalty

- (1) Pursuant to R.I. Gen. Laws Section 42-17.6-2, the following administrative penalty, as more specifically described in the attached penalty summary and worksheets, is hereby ASSESSED, jointly and severally, against each named respondent:

\$7,500

- (2) The proposed administrative penalty is calculated pursuant to the Rhode Island Code of Regulations titled *Rules and Regulations for Assessment of Administrative Penalties (250-RICR-130-00-1)* and must be paid to DEM within 30 days of your receipt of the NOV. Payment shall be in the form of a certified check, cashier's check or money order made payable to the "General Treasury - Water & Air Protection Program" and shall be forwarded to DEM's Office of Compliance and Inspection, 235 Promenade Street, Suite 220, Providence, Rhode Island 02908-5767.
- (3) Penalties assessed against Respondent in the NOV are penalties payable to and for the benefit of the State of Rhode Island and are not compensation for actual pecuniary loss.

G. Right to Administrative Hearing

- (1) Pursuant to R.I. Gen. Laws Chapters 42-17.1, 42-17.6, 42-17.7 and 42-35, each named respondent is entitled to request a hearing before DEM's Administrative Adjudication Division regarding the allegations, orders and/or penalties set forth in Sections B through F above. All requests for hearing MUST:
 - (a) Be in writing. See R.I. Gen. Laws Sections 42-17.1-2(21)(i) and 42-17.6-4(b);

- (b) Be **RECEIVED** by DEM's Administrative Adjudication Division, at the following address, within 20 days of your receipt of the NOV. See R.I. Gen. Laws Sections 42-17.1-2(21)(i) and 42-17.7-9:

Administrative Clerk
DEM - Administrative Adjudication Division
235 Promenade Street, Room 350
Providence, RI 02908-5767

- (c) Indicate whether you deny the alleged violations and/or whether you believe that the administrative penalty is excessive. See R.I. Gen. Laws Section 42-17.6-4(b); **AND**
- (d) State clearly and concisely the specific issues which are in dispute, the facts in support thereof and the relief sought or involved, if any. See Part 1.7(B) of the Rhode Island Code of Regulations titled *Rules and Regulations for the Administrative Adjudication Division (250-RICR-10-00-1)*.
- (2) A copy of each request for hearing must also be forwarded to:

Christina Hoefsmit, Esquire
DEM - Office of Legal Services
235 Promenade Street, 4TH Floor
Providence, RI 02908-5767

- (3) Each named respondent has the right to be represented by legal counsel at all administrative proceedings relating to this matter.
- (4) Each respondent must file a separate and timely request for an administrative hearing before DEM's Administrative Adjudication Division as to each violation alleged in the written NOV. If any respondent fails to request a hearing in the above-described time or manner regarding any violation set forth herein, then the NOV shall automatically become a Final Compliance Order enforceable in Superior Court as to that respondent and/or violation and any associated administrative penalty proposed in the NOV shall be final as to that respondent. See R.I. Gen. Laws Sections 42-17.1-2(21)(i) and (vi) and 42-17.6-4(b) and (c).
- (5) Failure to comply with the NOV may subject each respondent to additional civil and/or criminal penalties.
- (6) An original signed copy of the NOV is being forwarded to the Town of Smithfield, Rhode Island wherein the Property is located to be recorded in the Office of Land Evidence Records pursuant to R.I. Gen. Laws Chapter 34-13 and 2-1-24, as amended.

- (7) The NOV does not preclude the Director from taking any additional enforcement action nor does it preclude any other local, state, or federal governmental entities from initiating enforcement actions based on the acts or omissions described herein.

If you have any legal questions, you may contact (or if you are represented by an attorney, please have your attorney contact) Christina Hoefsmit of DEM's Office of Legal Services at (401) 222-6607. All other inquiries should be directed to David Chopy of DEM's Office of Compliance and Inspection at (401) 222-1360 extension 7400.

Please be advised that any such inquiries do not postpone, eliminate, or otherwise extend the need for a timely submittal of a written request for a hearing, as described in Section G above.

FOR THE DIRECTOR

By: _____
David E. Chopy, Administrator
Office of Compliance and Inspection

Dated: _____

CERTIFICATION

I hereby certify that on the _____ day of _____
the within Notice of Violation was forwarded to:

John Melucci
29 Sayles Hill Road
Lincoln, RI 02838

by Certified Mail.



ADMINISTRATIVE PENALTY SUMMARY

Program: OFFICE OF COMPLIANCE AND INSPECTION, WETLANDS
 File No.: OCI- FW-13-124 X-ref C13-0081
 Respondent: John Melucci

GRAVITY OF VIOLATION					
SEE ATTACHED "PENALTY MATRIX WORKSHEETS."					
VIOLATION No. & CITATION	APPLICATION OF MATRIX		PENALTY CALCULATION		AMOUNT
	Type	Deviation	Penalty from Matrix	Number or Duration of Violations	
D (1) and D (2) Alteration Of Pond Without A Permit (Wall and Dock)	Type I <i>(\$5,000 Max. Penalty) *</i>	Major	\$2,500	1 violation	\$2,500
D (1) and D (2) Alteration Of Pond Without A Permit (Boat Ramp)	Type I <i>(\$10,000 Max. Penalty) *</i>	Moderate	\$2,500	1 violation	\$2,500
D (1) and D (2) Alteration Of Perimeter Wetland Without A Permit	Type I <i>(\$10,000 Max. Penalty) *</i>	Moderate	\$2,500	1 violation	\$2,500
SUB-TOTAL					\$7,500

*Maximum Penalties represent the maximum penalty amounts per day, per violation.

ECONOMIC BENEFIT FROM NONCOMPLIANCE

COSTS OF COMPLIANCE, EQUIPMENT, O&M, STUDIES OR OTHER DELAYED OR AVOIDED COSTS, INCLUDING INTEREST AND/OR ANY COMPETITIVE ADVANTAGE DERIVED OVER ENTITIES THAT COMPLY. NOTE: ECONOMIC BENEFIT MUST BE INCLUDED IN THE PENALTY UNLESS:

- THERE IS NO IDENTIFIABLE BENEFIT FROM NONCOMPLIANCE; OR
- THE AMOUNT OF ECONOMIC BENEFIT CAN NOT BE QUANTIFIED.

A review of the record in this matter has revealed that Respondent has either enjoyed no identifiable benefit from the noncompliance alleged in this enforcement action or that the amount of economic benefit that may have resulted cannot be quantified.

ADMINISTRATIVE PENALTY SUMMARY (continued)

COST RECOVERY

ADDITIONAL OR EXTRAORDINARY COSTS INCURRED BY THE DIRECTOR DURING THE INVESTIGATION, ENFORCEMENT AND RESOLUTION OF AN ENFORCEMENT ACTION (EXCLUDING NON-OVERTIME PERSONNEL COSTS), FOR WHICH THE STATE IS NOT OTHERWISE REIMBURSED.

A review of the record in this matter has revealed that DEM has not incurred any additional or extraordinary costs during the investigation, enforcement and resolution of this enforcement action (excluding non-overtime personnel costs), for which the State is not otherwise reimbursed.

TOTAL PENALTY PROPOSED UNDER PENALTY REGULATIONS = \$7,500

PENALTY MATRIX WORKSHEET

CITATION: Alteration Of Pond Without A Permit (Wall and Dock)

VIOLATION NO.: D (1) and D (2)

TYPE		
<p style="text-align: center;"><u> X </u> TYPE I</p> <p><u>DIRECTLY</u> related to protecting health, safety, welfare or environment.</p>	<p style="text-align: center;">_____TYPE II</p> <p><u>INDIRECTLY</u> related to protecting health, safety, welfare or environment.</p>	<p style="text-align: center;">_____TYPE III</p> <p><u>INCIDENTAL</u> to protecting health, safety, welfare or environment.</p>
DEVIATION FROM THE STANDARD		
<small>THE DEGREE TO WHICH A VIOLATION IS OUT OF COMPLIANCE WITH THE REQUIREMENT VIOLATED.</small>		
<p><u>FACTORS CONSIDERED:</u></p> <p>Taken from Part 1.10(A)(1)(b) of the Rhode Island Code of Regulations titled <i>Rules and Regulations for Assessment of Administrative Penalties (250-RICR-130-00-1)</i></p> <ol style="list-style-type: none"> (1) The extent to which the act or failure to act was out of compliance: Respondent altered freshwater wetlands by constructing a wall and dock within the Pond. The severity of the alteration to the wetland environment was determined to be of importance to the regulatory program. (2) Environmental conditions: Prior to the unauthorized alterations, there was only a portion of the Pond edge that was walled on the Property (approximately 65 feet of wall adjacent to the house farthest north). The remaining Pond edge was a natural shoreline with overhanging red maples. There are no docks in the Pond. (3) Amount of the pollutant: Considered, but not utilized for this calculation. (4) Toxicity or nature of the pollutant: Considered, but not utilized for this calculation. (5) Duration of the violation: Full duration unknown – at least approximately 6½ years. DEM first documented the violation on 21 August 2013. (6) Areal extent of the violation: 165 linear feet (wall length) and approximately 100 square feet (dock). <p style="text-align: right;">(continued)</p>		

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- (7) **Whether the person took reasonable and appropriate steps to prevent and/or mitigate the noncompliance:** Respondent did not take reasonable and appropriate steps to prevent the noncompliance by applying for a wetland permit from DEM prior to constructing the wall and dock. Respondent has not taken reasonable and appropriate steps to mitigate the noncompliance, despite receiving a Warning Letter from DEM that was issued on 15 November 2013 requiring that he do so.
- (8) **Whether the person has previously failed to comply with any regulations, order, statute, license, permit or approval issued or adopted by the Department, or any law which the Department has the authority or responsibility to enforce:** Considered, but not utilized for this calculation.
- (9) **The degree of willfulness or negligence, including but not limited to, how much control the violator had over the occurrence of the violation and whether the violation was foreseeable:** Respondent had complete control over the project and had an obligation to protect the freshwater wetlands.
- (10) **Any other factor(s) that may be relevant in determining the amount of a penalty:** Considered, but not utilized for this calculation.

<u>X</u> MAJOR	MODERATE	MINOR
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Penalty Matrix where the applicable statute provides for a civil penalty up to \$5,000		TYPE I	TYPE II	TYPE III
DEVIATION FROM STANDARD	MAJOR	\$2,500 to \$5,000 \$2,500	\$1,250 to \$2,500	\$500 to \$1,250
	MODERATE	\$1,250 to \$2,500	\$500 to \$1,250	\$250 to \$500
	MINOR	\$500 to \$1,250	\$250 to \$500	\$100 to \$250

PENALTY MATRIX WORKSHEET

CITATION: Alteration Of Pond Without A Permit (Boat Ramp)

VIOLATION NO.: D (1) and D (2)

TYPE		
<p style="text-align: center;"><u> X </u> TYPE I</p> <p><u>DIRECTLY</u> related to protecting health, safety, welfare or environment.</p>	<p style="text-align: center;">_____ TYPE II</p> <p><u>INDIRECTLY</u> related to protecting health, safety, welfare or environment.</p>	<p style="text-align: center;">_____ TYPE III</p> <p><u>INCIDENTAL</u> to protecting health, safety, welfare or environment.</p>
DEVIATION FROM THE STANDARD		
THE DEGREE TO WHICH A VIOLATION IS OUT OF COMPLIANCE WITH THE REQUIREMENT VIOLATED.		
<p><u>FACTORS CONSIDERED:</u></p> <p>Taken from Part 1.10(A)(1)(b) of the Rhode Island Code of Regulations titled <i>Rules and Regulations for Assessment of Administrative Penalties (250-RICR-130-00-1)</i></p> <ol style="list-style-type: none"> (1) The extent to which the act or failure to act was out of compliance: Respondent altered freshwater wetlands by constructing a boat ramp within the Pond. The severity of the alteration to the wetland environment was determined to be of importance to the regulatory program. (2) Environmental conditions: Prior to the unauthorized alterations, there was what appears to be a beach or a pile of sand at the southern-most tip where there is now an unauthorized boat ramp (riprap in the Pond). (3) Amount of the pollutant: Considered, but not utilized for this calculation. (4) Toxicity or nature of the pollutant: Considered, but not utilized for this calculation. (5) Duration of the violation: Full duration unknown – at least approximately 22 months based on a review of April 2018 aerial photographs. (6) Areal extent of the violation: 300 square feet. 		
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- (7) **Whether the person took reasonable and appropriate steps to prevent and/or mitigate the noncompliance:** Respondent did not take reasonable and appropriate steps to prevent and/or mitigate the noncompliance.
- (8) **Whether the person has previously failed to comply with any regulations, order, statute, license, permit or approval issued or adopted by the Department, or any law which the Department has the authority or responsibility to enforce:** Considered, but not utilized for this calculation.
- (9) **The degree of willfulness or negligence, including but not limited to, how much control the violator had over the occurrence of the violation and whether the violation was foreseeable:** Respondent had complete control over the project, knowledge of the type and location of the wetlands on the Property and had an obligation to protect the wetlands.
- (10) **Any other factor(s) that may be relevant in determining the amount of a penalty:** Considered, but not utilized for this calculation.

MAJOR	<u>X</u> MODERATE	MINOR
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Penalty Matrix where the applicable statute provides for a civil penalty up to \$10,000		TYPE I	TYPE II	TYPE III
DEVIATION FROM STANDARD	MAJOR	\$5,000 to \$10,000	\$2,500 to \$5,000	\$1,000 to \$2,500
	MODERATE	\$2,500 to \$5,000 \$2,500	\$1,000 to \$2,500	\$500 to \$1,000
	MINOR	\$1,000 to \$2,500	\$500 to \$1,000	\$100 to \$500

PENALTY MATRIX WORKSHEET

CITATION: Alteration Of Perimeter Wetland Without A Permit

VIOLATION NO.: D (1) and D (2)

TYPE		
<p style="text-align: center;"><u> X </u> TYPE I</p> <p><u>DIRECTLY</u> related to protecting health, safety, welfare or environment.</p>	<p style="text-align: center;"><u> </u> TYPE II</p> <p><u>INDIRECTLY</u> related to protecting health, safety, welfare or environment.</p>	<p style="text-align: center;"><u> </u> TYPE III</p> <p><u>INCIDENTAL</u> to protecting health, safety, welfare or environment.</p>
DEVIATION FROM THE STANDARD		
THE DEGREE TO WHICH A VIOLATION IS OUT OF COMPLIANCE WITH THE REQUIREMENT VIOLATED.		
<p><u>FACTORS CONSIDERED:</u></p> <p>Taken from Part 1.10(A)(1)(b) of the Rhode Island Code of Regulations titled <i>Rules and Regulations for Assessment of Administrative Penalties (250-RICR-130-00-1)</i></p> <ol style="list-style-type: none"> (1) The extent to which the act or failure to act was out of compliance: Respondent altered freshwater wetlands by clearing, stumping, excavating, grading, creating lawn and constructing a fenced in area off the southern building within the Perimeter Wetland. The severity of the alteration to the wetland environment was determined to be of importance to the regulatory program. (2) Environmental conditions: Prior to the unauthorized alterations, the Perimeter Wetland had many trees in it and was not entirely maintained lawn as it is today. According to the aerial photographs, there was not much of an understory. (3) Amount of the pollutant: Considered, but not utilized for this calculation. (4) Toxicity or nature of the pollutant: Considered, but not utilized for this calculation. (5) Duration of the violation: Full duration unknown – at least approximately 8 years based on a review of aerial photographs taken in April 2012. (6) Areal extent of the violation: 6,500 square feet. 		
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- (7) **Whether the person took reasonable and appropriate steps to prevent and/or mitigate the noncompliance:** Respondent did not take reasonable and appropriate steps to prevent and/or mitigate the noncompliance.
- (8) **Whether the person has previously failed to comply with any regulations, order, statute, license, permit or approval issued or adopted by the Department, or any law which the Department has the authority or responsibility to enforce:** Considered, but not utilized for this calculation.
- (9) **The degree of willfulness or negligence, including but not limited to, how much control the violator had over the occurrence of the violation and whether the violation was foreseeable:** Respondent had complete control over the project, knowledge of the type and location of the wetlands on the Property and had an obligation to protect the wetlands.
- (10) **Any other factor(s) that may be relevant in determining the amount of a penalty:** Considered, but not utilized for this calculation.

MAJOR	<u>X</u> MODERATE	MINOR
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Penalty Matrix where the applicable statute provides for a civil penalty up to \$10,000		TYPE I	TYPE II	TYPE III
DEVIATION FROM STANDARD	MAJOR	\$5,000 to \$10,000	\$2,500 to \$5,000	\$1,000 to \$2,500
	MODERATE	\$2,500 to \$5,000 \$2,500	\$1,000 to \$2,500	\$500 to \$1,000
	MINOR	\$1,000 to \$2,500	\$500 to \$1,000	\$100 to \$500