Curt Spalding – Principal, Spalding Environment and Climate Strategies
Testimony in Support of RI H7991
Nature-Based Solutions for Water-Related Climate Resilience

Chairperson and Members of the Committee,

Thank you for the opportunity to submit testimony in support of H7991. I strongly support this legislation and its findings recognizing that nature-based solutions are a proven, effective, and forward-looking approach to addressing water-related impacts driven by accelerating climate change.

Rhode Island is on the front lines of climate change. Sea level rise, coastal erosion, stronger storms, and increased inland flooding are already affecting our communities, infrastructure, and economy. As climate change accelerates and these impacts intensify, it is essential that the State invest in solutions that are not only effective today, but resilient over time.

H7991 appropriately recognizes that nature-based solutions—including living shorelines, wetland restoration, floodplain reconnection, and green infrastructure—are proven and mature strategies for managing erosion, flooding, and other water resource challenges. Unlike traditional hardened infrastructure, these approaches work with natural systems to absorb, slow, and store water. Wetlands and floodplains reduce flood peaks, living shorelines dissipate wave energy, and green infrastructure reduces stormwater runoff while improving water quality. These are not experimental ideas; they are widely demonstrated, science-based practices delivering measurable results. By amending Title 46 of the General Laws entitled "Waters and Navigation," H7991 asserts as state policy that nature-based solutions are among the most environmentally sound and cost-effective ways to address water-related climate change impacts. Asserting this policy is a big step towards moving Rhode Island water law into the 21st century.

The bill also reflects the leadership of the Rhode Island Coastal Resources Management Council, which already incorporates living shoreline principles into its regulatory programs. By prioritizing natural erosion control methods, CRMC helps protect coastal ecosystems while strengthening shoreline resilience. This alignment between policy and practice underscores that Rhode Island has both the expertise and the institutional framework to expand the use of these approaches.

Other states are already taking action to address permitting challenges. Massachusetts has implemented reforms to streamline permitting by consolidating approvals, establishing clear timelines for decisions, and improving coordination across agencies. The state has also updated its environmental and stormwater regulations to better support green infrastructure and resilience projects such as wetland restoration and flood mitigation.

Recognizing that resource constraints and process inefficiencies can delay beneficial projects, Massachusetts is moving toward using general permits to accelerate nature-based solutions. Through these permits, categories of low-impact, high-benefit activities—such as wetland

restoration, stormwater management, and shoreline stabilization—are pre-approved under standardized conditions. Instead of requiring lengthy individual permit reviews, applicants can proceed through a more efficient Notice of Intent process when projects meet established criteria. These reforms do not weaken environmental protections; rather, they make it easier to advance projects that deliver stronger, more sustainable outcomes.

The comparison with Massachusetts highlights an important point: the primary barrier to scaling nature-based solutions is not a lack of science or effectiveness, but the structure and efficiency of permitting systems. There are serious resource constraints in Rhode Island regulatory programs. Rhode Island agencies must consider alternative permitting and enforcement reforms to achieve the goals of this proposed legislation.

Perhaps the most pressing climate-driven challenge is the increasing intensity of rainfall during storm events. Restoring watershed function—through right-sizing culverts, reconnecting floodplains, and removing obsolete dams—is an immediate and practical way to reduce flooding risk, improve habitat, and increase community resilience. These are precisely the types of projects that should be easier—not harder—to permit.

For that reason, I respectfully suggest that H7991 be strengthened with a clear directive to improve permitting for nature-based solutions, particularly within the freshwater wetlands program. Specifically, the legislation could:

- **Establish a general permit or programmatic approval pathway** for defined categories of nature-based projects (e.g., culvert upgrades, dam removals, floodplain reconnection, and wetland restoration);
- **Set predictable review timelines** for these projects to ensure timely decisions;
- **Allow for a Notice of Intent–style application process** for projects that meet pre-established environmental criteria; and
- **Direct agencies to prioritize projects that restore natural hydrology and reduce flood risk.**

Nature-based solutions are a demonstrated better approach to addressing accelerating climate change and this legislation puts that truth into law.

They are inherently adaptive. Natural systems can grow, migrate, and evolve as conditions change, providing long-term resilience that static, engineered structures often cannot match.

They deliver multiple benefits simultaneously. In addition to reducing flooding and erosion, they improve water quality, restore habitat, support fisheries, sequester carbon, and enhance recreational opportunities—benefits that traditional infrastructure does not provide.

They are cost-effective over time. By reducing damage from storms and flooding and lowering maintenance needs, nature-based solutions can decrease long-term public expenditures.

And finally, they support healthier and more equitable communities. Expanding green infrastructure and restoring natural areas can reduce heat, improve air and water quality, and bring environmental benefits to neighborhoods that have historically been underserved.

H7991 recognizes that meeting the challenges of climate change requires moving beyond outdated approaches and embracing solutions that are resilient, efficient, and grounded in the natural strengths of Rhode Island's landscapes.

For these reasons—and with the opportunity to further strengthen permitting provisions—I respectfully urge the Committee to support H7991.

Thank you for your consideration.