



State of Rhode Island
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March 25, 2026

The Honorable David A. Bennett, Chairman
House Committee on Environment and Natural Resources
State House - 82 Smith Street
Providence, RI 02903

RE: H 7991 An Act Relating to Waters and Navigation – Coastal Resilience – Nature-Based Solutions for Erosion Control, Water Resource Management, and Expedited Permitting

Dear Chairman Bennett,

Thank you for providing the Coastal Resources Management Council (CRMC) with the opportunity to comment on H7991. CRMC does not support or oppose the bill but offers the following comments.

As written H7991 would direct CRMC, and the Department of Environmental Management (DEM), to update our respective existing regulatory programs to prioritize nature-based solutions. It would also require both agencies to include procedures for expedited review of such. However, the bill would also require DEM, in consultation with CRMC and the Chief Resilience Officer, to serve essentially as a permit application coordinator for the two agencies. Additionally, this role would include coordinating the review of such activities with municipal governments. Lastly it would also set maximum review times for not only application acceptance but more importantly application decisions.

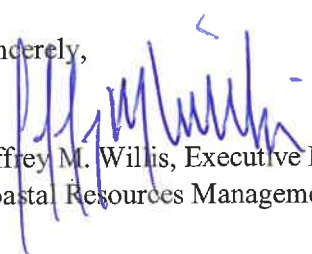
As to the coordinated review process and subsequent regulatory revisions, both agencies may have different overarching policy considerations for permitting nature-based solutions that may contradict. For example, a living shoreline application may be acceptable for CRMC due to its position in a littoral system relative to a shoreline feature, but that position in that littoral system may adversely affect a fishery or biological habitat of concern to DEM.

As to requiring review timeframes to applications, CRMC has experienced over the past several decades that site constraints, engineering and biological impact issues, and necessary public input often require a fair amount of time be spent addressing those issues, such that if a maximum review period is imposed prior to finding a balanced solution, the agency review most likely would result in a denial recommendation, rather than taking the time to find a solution that would work for not only the coastal regulatory program(s) but just as importantly the applicant.

Lastly, including municipal coordination to be overseen by DEM would result in a level of complexity that would add time to any subsequent review rather than try to expedite it.

We appreciate this opportunity to provide comments on H7991. Please feel free to me should you have any additional questions or wish to discuss this matter further.

Sincerely,


Jeffrey M. Willis, Executive Director
Coastal Resources Management Council

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