

April 4, 2022

To: Chairwoman Deb. Ruggiero, CRMC Task Force

Fr: Sven Risom, Member – CRMC Commission

Re: April 5 CRMC Commission Meeting

Unfortunately, I am unable to attend the April 5<sup>th</sup> meeting and therefore I would like to have the following read into the record as you see fit. This is the first “summary” session for the Commission after months of meetings with key leaders including the Director of the CRMC and Staff, the Director of the DEM, NOAA’s Regional Director, the Governor’s Chief-of-Staff as well as many other interested and important parties.

The CRMC is a vital agency given the critical nature of the coastline to Rhode Island’s economy; the new challenges facing the state from rising sea levels and increased storm surges; the importance of fishing, shellfishing and aquaculture to our economy; and the exponential growth of wind energy that is a central focus of the state’s future.

Before diving into my priority recommendations, I want to be clear that I feel the CRMC staff is outstanding and professionally offers science and data-based recommendations. After months of meetings, please find my priority recommendations so that the CRMC can best meet today’s diverse and complex issues on our coastline:

- The Director of the CRMC should report to the Governor, not a Council.
  - The CRMC Council approach may have been an optimal structure when established but the complexity of issues, the increased breadth of responsibilities and the expanded pressures on the coastline requires a new proven approach. This recommendation reflects the structure of most agencies and the importance of the CRMC to Rhode Island residents.
  - The Director of the CRMC stated that a major benefit from the Council was getting differing opinions and a variety of insights. While this is valuable, I would like to paraphrase the Director of the DEM as he stated that there was no shortage of public feedback, opinions and insights. I do not believe the Council structure is the best way to get feedback and opinions on scientific matters.
  - I believe the CRMC leadership (Council) must be data, fact and science oriented. I do not see, nor heard during all the meetings, the value of a Council that does not have the professional or educational expertise to weigh in on such matters.
  - I believe that staff time spent educating and “training” the Council members (as noted by the Director) can be better allocated to working in the field, on applications and supporting the RI coastline.

- CMRC staff needs to be increased to meet the expanded responsibilities. The CRMC staff has been at or close to 30 members (currently 26-28 FTE's) for the past 20 years. Since then, the emergence of wind energy, rising sea levels/storm surges and aquaculture (to name only a few) have exponentially grown the demands on the CRMC yet there has been "no" growth in staff. And more development has significantly increased applications and enforcement requirements, yet the staff has not been increased (staff was 28 in 2003!).
- CRMC legal support needs to be in-house, not sourced from an outside firm. This issue has been discussed at length during our meetings. Accountability and transparency as well as clear lines of reporting are essential as the issues before the CRMC have increased legal complexities and corporate pressures. While there was a time that outside representation may have been appropriate, I feel that time has passed.
- The number of CRMC enforcement officers need to be significantly increased. Enforcement is essential to our coastal environment as staff recommendations are only valuable if enforced.
- Investigate shared resources with DEM and/or other agencies:
  - Legal?
  - Enforcement?
  - Hearing Officers?

I hope the above priority recommendations and comments help. I am sorry I cannot be there tomorrow and look forward to discussing my other recommendations at the next meeting.

Sincerely yours,

Sven Risom  
Block Island