



Office of Management & Budget

Response to S 3149: Evaluating Rhode Island's Coastal Management Framework

Last Updated: February 14, 2025

Executive Summary

In response to Rhode Island [Senate Resolution S 3149](#), the Department of Administration (DOA), through the Office of Management and Budget (OMB), conducted a comprehensive review of the Coastal Resources Management Council (CRMC). The resolution directed DOA to evaluate CRMC's structure and consider potential changes, including maintaining its current governance, establishing it as a standalone department, or integrating it with the Department of Environmental Management (DEM). This review assesses operational efficiencies, jurisdictional overlaps, regulatory frameworks, and financial implications for each proposed restructuring option.

Methodology

As part of this review, OMB engaged in extensive research, incorporating stakeholder perspectives, agency consultations, and comparative analysis of coastal zone management models in other states.

To ensure a well-informed evaluation, OMB undertook the following activities:

- **Stakeholder Survey:** A survey was distributed to key stakeholders, including environmental organizations and industry groups, gathering feedback on CRMC's governance, processes, and areas for improvement.
- **Agency Consultations:** OMB conducted discussions with leadership from CRMC and DEM, and staff of the National Oceanic and Atmospheric Administration (NOAA) to assess interagency coordination, jurisdictional overlaps, and federal requirements.
- **Comparative Analysis:** A review of coastal zone management structures in other states provided insights into governance models and regulatory effectiveness.

Options for Consideration

This report outlines four primary options for CRMC's future structure, each with unique implications for governance, operational efficiency, and fiscal impact.

Option 1: Maintain Existing Governance Model

Under this scenario, CRMC would continue operating with its current or a modestly modified governance council. This option preserves continuity and retains CRMC's public participation framework. However, stakeholder feedback indicated ongoing challenges with the current structure, including governance inefficiencies, inconsistent decision-making, and quorum-related delays. While fiscally neutral, maintaining the status quo may not resolve stakeholder concerns regarding efficiency and coordination with DEM.

Option 2: CRMC Becomes a Standalone Department

This option transitions CRMC into the Department of Coastal Resources, eliminating the governance council and placing decision-making authority under a Governor-appointed director. While this structure streamlines regulatory functions, it adds staffing and office space costs. It also does not address operational overlap with DEM. The estimated cost increase for Option 2 ranges from \$1.0 million to \$1.9 million in FY 2026.

Option 3: CRMC Becomes a Bureau within DEM

Under this model, CRMC would be integrated as a Bureau of Coastal Management within DEM, eliminating its independent status and governing council while preserving a dedicated focus on coastal resources. Regulatory authority would shift to DEM's leadership, with some administrative functions consolidated to improve efficiency. While this option offers cost savings over time and enhances coordination, the estimated cost increase of Option 3 ranges from \$800,000 to \$1.3 million in FY 2026.

Option 4: Full Integration into DEM

This option represents the most comprehensive restructuring, dissolving CRMC as a separate entity, eliminating the governing council, retaining some coastal management functions within a new DEM division, and embedding others into existing DEM divisions, including wetlands permitting, enforcement, and planning. Option 4 offers cost savings over time and improves coordination but would move coastal resources management from the current centralized approach to a networked model. The estimated cost increase ranges from \$500,000 to \$1.0 million in FY 2026.

Next Steps

As outlined in the report, key factors for policymakers to consider include public participation, jurisdictional coordination, and fiscal implications. This report provides a foundation for informed decision-making as Rhode Island seeks to optimize its coastal resource management framework.



Office of Management & Budget

Response to S 3149: Evaluating Rhode Island's Coastal Management Framework

Last Updated: February 14, 2025

Background, Scope, and Methodology

In June 2024, the Rhode Island Senate passed [Resolution S 3149](#), directing the Department of Administration (DOA) to conduct a comprehensive review of the Coastal Resources Management Council (CRMC). This resolution specifically requested an evaluation of potential organizational changes, including a cost-benefit analysis of CRMC becoming a standalone state department or merging with the Department of Environmental Management (DEM). Additionally, it called for an examination of overlapping authority, an assessment of current operational structures, and an identification of federal approvals required for either transition. The resolution also tasked DOA with evaluating the organizational structure, staffing, and resources necessary for CRMC to function effectively as either a standalone department or as part of DEM. The full language of Resolution S 3149 is included in Appendix A.

To fulfill the directives outlined in the resolution, DOA assigned the Office of Management and Budget (OMB) to lead this review. This report constitutes OMB's official response and provides a comprehensive analysis of the organizational and operational considerations for restructuring CRMC.

The information contained in this document is derived through a multi-faceted review that includes independent research, consultations with leadership from CRMC and DEM, and engagement with the National Oceanic and Atmospheric Administration (NOAA). Additionally, the review analyzes relevant Rhode Island General Laws, assesses Coastal Zone Management Programs (CZMPs) in other states for comparative insights, and incorporates feedback collected through a survey of CRMC stakeholders. The findings aim to equip policymakers with a detailed understanding of potential restructuring scenarios and their implications for Rhode Island's coastal management framework.

Overview of CRMC

The Coastal Resources Management Council was established in 1971 under [Rhode Island General Law \(RIGL\) § 46-23-1](#). The law outlines the state's commitment to preserving, protecting, developing, and restoring its coastal resources through coordinated, long-term planning and management:

"[...] it shall be the policy of this state to preserve, protect, develop, and, where possible, restore the coastal resources of the state for this and succeeding generations through comprehensive and coordinated long range planning and management designed to produce the maximum benefit for society from these coastal resources; and that preservation and restoration of ecological systems shall be the primary guiding principle upon which environmental alteration of coastal resources will be measured, judged, and regulated."

Structure and Funding

For Fiscal Year 2025, CRMC's enacted budget totals \$6.2 million, comprising \$3.6 million in General Revenue, \$2.3 million in Federal Funds, and \$0.3 million in Restricted Receipts. All CRMC activities are encompassed under one budgetary program, "Central Management." The agency is authorized for 32 full-time equivalent (FTE) positions. Unionized CRMC staff are represented by two labor unions, the International Federation of Professional and Technical Engineers (IFPTE) Local 400 and Council 94 Local 2881, both of which also represent certain DEM employees.

CRMC's offices are located at the Stedman Government Center in South Kingstown, Rhode Island. This facility serves as the operational hub for both internal functions and public-facing activities. An organizational chart detailing CRMC's staff structure is provided in Appendix B.

CRMC operates under the governance of a ten-member council ("the council" or "CRMC's council"), supported by a permanent professional staff.

In accordance with [RIGL § 46-23-2](#), nine council members are appointed by the Governor with the advice and consent of the State Senate. The DEM Director or his/her designee serves as an ex officio member, acting as the tenth member of the council. While no specific education or background requirements exist for council members, the law specifies that no more than two members can be from the same municipality. Members, who are unpaid, are appointed for terms of up to three years but may serve until their successors are appointed and qualified or until they are no longer able to serve.

The composition of the ten members is as follows:

- The DEM Director, or his/her designee, serves as an ex officio member;
- Six members are appointed or elected officials of local government. All officials must hold their appointed or elected seat to remain on the council for their full term:
 - Three members from municipalities with populations fewer than 25,000;
 - Three members from municipalities with populations greater than 25,000;
 - At least five of the six members must represent coastal municipalities;
- Three members are appointed from the general public:
 - One of these members must reside in a coastal community.

In accordance with [RIGL § 46-23-4.1](#), the Executive Director of CRMC is appointed by the Governor with the advice and consent of the Senate. The law states that the Director is considered an employee of the council and "shall not be a member of the council."

CRMC staff is organized into four integrated functional areas: administration, policy and planning, regulatory operations, and enforcement. These teams are composed of skilled professionals, including engineers, environmental scientists, coastal policy analysts, and marine resources specialists, who provide both technical expertise and administrative support to fulfill CRMC's mission.

Scope of Authority and Responsibilities

CRMC's authority falls into three tiers. The first tier of authority spans from 200 feet inland of any coastal feature to three miles offshore, encompassing natural features such as beaches, dunes, wetlands, and rocky shores, as well as culturally significant areas. The second tier of authority comprises the entirety of the 21 coastal communities for projects that require review under the consistency provisions of the federal [Coastal Zone Management Act \(CZMA\) of 1972](#). Lastly, in accordance with [RIGL § 46-23 et seq.](#), the third tier of authority is statewide for projects that have the potential to impact Rhode Island's coastal resources.

CRMC develops policies and rules governing the state's coastal uses and resources, including the implementation of "Special Area Management Plans" (SAMPs), and issues permits in designated coastal zones (called assents).

Core Responsibilities

As reported by CRMC, the agency's primary responsibilities include:

- Managing the state's coastal waters and shorelands to ensure public trust resources are available to all citizens;
- Regulating land use development projects to minimize impacts to coastal resources from private development;
- Identifying and designating state public rights of way to the shore to allow for shoreline access in perpetuity;
- Assessing and mitigating coastal hazards through both policy and permitting programs;
- Restoring and improving coastal and estuarine habitats to balance development, preserve natural resources, and promote resiliency;
- Overseeing municipal harbor management plans for the equitable management of the state's coastal waters;
- Regulating aquaculture, water quality in coastal areas, and submerged lands to protect public health and ecological integrity;
- Conducting marine spatial planning, including the appropriate siting of offshore development;
- Reviewing offshore wind projects, including consideration of fisheries compensation as addressed by the DEM Division of Marine Fisheries;
- Regulating land use development projects to minimize impacts from all development, including impacts from climate change and sea level rise; and
- Enforcing regulations and conducting public outreach to promote awareness and compliance.

Stakeholder Engagement and Coordination

CRMC works with local, state, and federal partners, and the general public to fulfill its legislative mandate. At the local level, CRMC engages with municipalities, individuals, businesses, and nonprofits. At the state level, it aligns efforts with DEM, the Department of Health, and Division of Statewide Planning on permitting and related activities.

At the federal level, CRMC operates under partial funding and authority provided by the CZMA, administered by NOAA. The CZMA establishes a voluntary partnership between the federal government and coastal states to promote a comprehensive approach to managing

coastal resources, including “balancing the often competing and occasionally conflicting demands of coastal resource use, economic development, and conservation.”¹

Each coastal state and territory may voluntarily choose to participate in the National Coastal Zone Management Program under the CZMA. When state agencies or entities develop a coastal management program and receive NOAA approval, the state must implement its federally approved coastal management program in accordance with the CZMA, NOAA’s implementing regulations, and NOAA’s approval findings for the state’s program.

In Rhode Island, CRMC administers the state’s federally approved coastal management program. NOAA conducts periodic reviews of each state’s coastal management program—typically every five to ten years—to evaluate the program’s effectiveness and compliance with the CZMA, NOAA’s implementing regulations, and NOAA’s approval findings for the state’s program. Rhode Island’s current review is underway, with the final report expected in early 2025. The previous report was issued in March 2020.²

While this report and NOAA’s review are being prepared concurrently, they have been developed independently and follow distinct methodologies.

Overview of DEM

The Rhode Island Department of Environmental Management was established in 1977 under [RIGL § 42-17.1](#), which charges the department with the power and duty “[t]o supervise and control the protection, development, planning, and utilization of the natural resources of the state.”

Structure and Funding

For FY 2025, DEM’s enacted budget is \$143.7 million, consisting of \$57.2 million in General Revenue, \$36.0 million in Federal Funds, \$21.3 million in Restricted Receipts, and \$29.2 million in other funds. The agency is authorized for 439.0 FTEs. An organizational chart detailing DEM’s structure can be found in Appendix C.

The state budget organizes DEM into three primary programs:

- Office of the Director
- Bureau of Natural Resources
- Bureau of Environmental Protection

¹ [Coastal Zone Management Act. NOAA Office for Coastal Management](#)

² [Evaluation Findings: Rhode Island Coastal Management Program: March 2010 to June 2019](#)

DEM is led by the Office of the Director, which oversees the agency's diverse programs and initiatives. This office includes Management Services, Legal Services, and Administrative Adjudication, each providing critical support and ensuring regulatory compliance.

The Bureau of Natural Resources is organized into eight divisions that provide stewardship of the State's natural resources – fish and wildlife, agriculture, law enforcement, parks and recreation, forest environment, planning and development, coastal resources, the Narragansett Bay National Estuarine Research Reserve, and marine fisheries. DEM's existing Coastal Resources Division is responsible for the development, management, and maintenance of the Port of Galilee, State Piers 4, 5, and 9, and Chase Marina, along with supporting the commercial fishing and aquaculture industries in Rhode Island.

The Bureau of Environmental Protection performs regulatory and assistance programs to ensure the quality of Rhode Island's environment. It contains the offices of water resources, compliance and inspection, customer and technical assistance, air resources, land revitalization and sustainable materials management, and the emergency response program.

These divisions work to implement DEM's mission across various domains, from conservation and recreational services to regulatory oversight of environmental protection.

Scope of Authority and Responsibilities

DEM operates under a broad mandate encompassing environmental protection and natural resources management. Its responsibilities include safeguarding air, water, and land resources; promoting sustainable practices across industries such as agriculture and fishing; and ensuring public access to recreational and scenic areas. In recent years, DEM has played a central role in Rhode Island's efforts to mitigate and adapt to climate change impacts, including sea level rise, extreme weather events, and increased flooding, with the DEM Director chairing the Rhode Island Executive Climate Change Coordinating Council (EC4).

Core Responsibilities

As reported by DEM, the agency's primary responsibilities include:

- Protecting and improving air quality through regulating air pollutants;
- Operating an administrative court to adjudicate environmental matters;
- Managing Rhode Island's parks, forests, and coastal resources (including Port of Galilee; State Piers 4,5 and 9; and the Chase Marina) to ensure sustainable public access;

- Sustaining, promoting, and enhancing agricultural viability throughout the state;
- Administering the boat registration program and commercial fishing license programs;
- Regulating aquaculture and marine fisheries;
- Managing the collection, quality, and timely dissemination of all weather and climate related information;
- Enforcing compliance with air, waste, and water regulations which includes investigating dam safety, freshwater wetlands, hazardous waste, medical and solid waste;
- Responding to environmental emergencies with an on-call 24/7 unit of first responders;
- Leading efforts to mitigate climate change and enhance resilience to its impacts; and
- Ensuring equitable access to environmental benefits and preventing disproportionate exposure to environmental risks.

Stakeholder Engagement and Coordination

To fulfill its mission, DEM works with a variety of stakeholders, including municipalities, state and federal agencies, nonprofits, and the public. One example of this engagement is through the Rhode Island Marine Fisheries Council (RIMFC), an advisory board administered by DEM. The RIMFC provides critical recommendations on aquaculture lease proposals, management plans, and regulations for marine fisheries, ensuring input from commercial and recreational stakeholders. Meeting approximately six times per year, the council facilitates public participation and stakeholder input, demonstrating DEM's commitment to incorporating diverse perspectives in its decision-making processes.

DEM also interacts with the public through workshops, public hearings, and informational meetings related to DEM-related matters.

At the state level, DEM coordinates with CRMC, particularly on coastal and offshore initiatives such as aquaculture and renewable energy projects. DEM's programs are also supported through federal partnerships with entities including the Environmental Protection Agency (EPA), the Atlantic States Marine Fisheries Commission, the New England Fishery Management Council, the US Fish and Wildlife Service, and NOAA.

Jurisdictional Overview and Interagency Coordination

While CRMC has broad authority over Rhode Island’s approximately 420 miles of coastline, there are areas of jurisdictional overlap that require coordination with DEM. These include the oversight of wetlands, aquaculture, dredging operations, and other activities related to coastal and environmental management.

Wetlands Oversight and Jurisdictional Boundaries

DEM and CRMC share responsibility for regulating the state’s wetlands but oversee different geographic areas. DEM manages all freshwater wetlands within its jurisdiction, while CRMC is responsible for coastal wetlands and freshwater wetlands within its designated areas. As stipulated in [RIGL § 46-23-6](#), a GIS map delineating the jurisdictional boundaries for wetlands oversight, jointly developed by DEM and CRMC, is available in Appendix D.

Projects located entirely within one agency’s jurisdiction are reviewed solely by that agency, while those projects located on the boundary of the agencies’ jurisdictions follow the process established by active rule 250-RICR-150-15-3.54 to establish which agency reviews the project.³ According to this rule, “for linear projects that are on both sides of the jurisdictional boundary, the Department [of Environmental Management] and CRMC shall jointly determine which agency will serve as the reviewing agency.”

The regulation also establishes the factors influencing the determination, including “the extent and location of the jurisdictional area, the area and proximity of potential land disturbance, and the guidelines set forth in any applicable watershed plan.”

Aquaculture Oversight and Management

DEM oversees much of the state’s food production, including the management of wild fisheries and agricultural operations. CRMC serves as the lead agency for aquaculture, a form of food production involving the cultivation of aquatic plants and animals. CRMC is responsible for permitting aquaculture operations and representing the state in aquaculture-related matters.

The legislature has authorized CRMC to lease submerged lands for aquaculture activities, reflecting its role as the primary manager of submerged lands in Rhode Island’s coastal waters. This jurisdiction extends statewide and includes oversight of certain land-based and freshwater aquaculture activities outside the traditional coastal zone. In contrast, DEM regulates wild fisheries, shellfish harvesting, marine management zones, and conducts

³ [250-RICR-150-15-3 RI Rules and Regulations Governing the Administration and Enforcement of the Freshwater Wetlands Act](#)

marine resource surveys. DEM also advises CRMC on aquaculture permitting decisions to help ensure alignment with broader resource management goals.

The aquaculture permitting process involves both CRMC and DEM, whereby the DEM Director and the Marine Fisheries Council (RIMFC) provide recommendations for CRMC consideration during application reviews. The RIMFC, composed of appointed members from the fishing community, assesses the compatibility of proposed aquaculture operations with existing uses of the marine fisheries. DEM evaluates whether proposed activities may adversely affect marine life, indigenous fisheries, or other state resources.

Beyond permitting, DEM regulates the handling and marketing of aquaculture products through its Division of Agriculture. These regulations include public health measures to ensure food safety and environmental sustainability, guided by compliance with state and federal standards such as those required by the U.S. Food and Drug Administration (FDA) and the National Shellfish Sanitation Program (NSSP). Through a memorandum of agreement, CRMC assists DEM by monitoring aquaculture farms for compliance with these regulations. This partnership enhances regulatory oversight and ensures adherence to state and federal requirements.

DEM also participates in CRMC's Aquatic Biosecurity Board, which advises on risks associated with aquatic diseases and the movement of aquatic species. The board includes representatives from DEM's Division of Marine Fisheries and State Veterinarian, as well as academic and industry experts.

Dredging Regulation and Permitting

Both CRMC and DEM are responsible for regulating and monitoring dredging operations in the state and dredging is completed through joint permitting. CRMC oversees dredging and disposal operations within tidal waters and ensures the beneficial use of dredged materials,⁴ while DEM oversees disposal standards of dredged materials with an emphasis on maintaining water quality, groundwater protection, and the preservation of fish and wildlife habitats.⁵ Joint permitting issued by both CRMC and DEM, and potential compliance inspections from either agency, is required when dredging is being performed by a contractor. CRMC and DEM report that they cooperate in the implementation of comprehensive programs for dredging.

⁴ [RIGL § 46-23-6 CRMC Powers and duties](#)

⁵ [RIGL § 42-17.1-2 DEM Powers and duties](#)

Shared Responsibilities and Interagency Coordination

Additionally, CRMC and DEM have interrelated responsibilities including:

- **Enforcement** – CRMC and DEM each maintain their own enforcement units to enforce their applicable laws and regulations. DEM Environmental Police provide support to CRMC when needed and if an officer is available. Typically, this involves assistance with shoreline access issues, which is mainly CRMC’s jurisdiction, and in which CRMC also partners with municipal law enforcement units to assist.
- **Offshore wind development** – CRMC and DEM both provide review, expertise on potential resource impacts, and approvals for offshore wind in state waters. For offshore wind in federal waters, CRMC reviews projects under the CZMA federal consistency provision, and coordinates review of documents generated as required by various federal agencies with other state agencies, including DEM.⁶
- **Permitting** – CRMC and DEM both conduct permitting and each agency currently maintains its own separate natural resource permitting systems.
- **Invasive species management and habitat improvements** – CRMC monitors coastal regions (saltwater species), while DEM monitors both freshwater and marine species.
- **Public education and outreach** – CRMC and DEM have outreach teams, some of whom have similar stakeholders. For example, DEM runs the state’s safe boating program and fish and wildlife outreach programs, while CRMC generally educates about coastal regions.
- **Water quality programs and septic systems** – DEM and CRMC work jointly on water quality programs and septic systems. DEM oversees permitting of septic systems but works jointly with CRMC on policies.

While the agencies have established divisions of labor and procedures to minimize jurisdictional overlap, occasional overlaps in responsibilities may still occur.

According to discussions with leadership from both agencies, communication between CRMC and DEM is frequent. The directors of CRMC and DEM indicate that they typically meet on a monthly basis to coordinate issues of mutual interest. The DEM Director, or his/her representative, serves on CRMC’s council as an ex officio member.

Additionally, CRMC and DEM work especially closely through DEM’s Narragansett Bay National Estuary Research Reserve (NBNERR), including the sharing of inter-agency subawards from NOAA, the execution of memorandums of understanding (MOUs) regarding

⁶ [NOAA Office for Coastal Management, Federal Consistency Overview](#)

sharing of vessels, and by NBNERR chairing the RI Coastal and Estuarine Habitat Restoration Trust Fund Technical Advisory Committee that makes funding recommendations to CRMC.

Review of Other State Coastal Management Programs

In preparing this report, OMB reviewed the existing CZMP structures of the 29 eligible coastal states to compare them with Rhode Island's model.⁷

As previously mentioned, the CZMP is a voluntary partnership between the federal government (administered by NOAA) and U.S. coastal and Great Lakes states and territories authorized by the Coastal Zone Management Act (CZMA) of 1972 to address national coastal issues. Rhode Island's program was approved by NOAA in 1978. The act provides the basis for protecting, restoring, and responsibly developing our nation's diverse coastal communities and resources. The intent is to balance the often competing and occasionally conflicting demands of coastal resource use, economic development, and conservation.

NOAA provides grant funding (both formula and discretionary) to states to enhance their coastal zone management practices within nine specified areas: wetlands, coastal hazards, public access, marine debris, cumulative and secondary impacts, special area management planning, ocean and Great Lakes resources, energy and government facility siting, and aquaculture. Participating states are subject to NOAA's rules and regulations as well as NOAA's review and approval of their CZMP activities, including any program changes.

Organizational Models of Coastal Management Programs

CZMPs approved by NOAA generally follow one of two primary organizational models: Direct Models or Networked Models. These frameworks define how responsibilities for coastal management are assigned and carried out within each state or territory.

Rhode Island operates under a Direct Model, where all CZMP responsibilities are consolidated within a single state agency. This centralized approach aims to streamline decision-making and comprehensive oversight, as one entity handles permitting, regulatory authority, and program implementation in coastal areas. According to NOAA data, 9 of the 34 NOAA-approved CZMPs operate under this model, including 7 of the 29 state CZMPs.

⁷According to NOAA, "under the CZMA there are 35 eligible coastal states, including the continental states on the Atlantic Ocean, Gulf of Mexico, and Pacific Ocean, including Alaska and Hawai'i, the Great Lakes states, and the U.S. territories and commonwealths of Puerto Rico, U.S. Virgin Islands, Guam, American Samoa, and the Northern Mariana Islands. In 2011, Alaska voluntarily left the National Coastal Zone Management Program and no longer has a federally approved coastal management program."

Networked Models distribute CZMP responsibilities among multiple state agencies, with a designated lead agency coordinating the efforts. This approach allows for varying degrees of centralization, depending on the state. Some states operate fully networked systems, while others rely on a few lead agencies for primary operations. NOAA reports that 25 of the 34 NOAA-approved CZMPs use this model, including 22 of the 29 state CZMPs.

Each organizational model reflects the unique needs and governance structures of the state or territory it serves, balancing centralized authority with local and regional collaboration where applicable.

For the purposes of this report, OMB also reviewed governance models across NOAA-approved CZMPs. These models reflect how states and territories organize oversight and decision-making authority, ranging from no formal council involvement to advisory or governance councils with varying levels of influence.

Types of Governance Models

Since no definitive index of coastal management program governance structures exists, OMB conducted an analysis and categorized these programs into three groups based on their use of councils:

- **No Council** – In several states, no formal environmental board or council is utilized.⁸ These states rely solely on government agency leadership for policy development and decision-making. This approach excludes direct public or stakeholder input through council structures.
- **Advisory Council** – The most common structure, adopted by the majority of coastal states, involves an agency supported by an advisory council. These councils provide a platform for public input through forums, meetings, and other stakeholder engagement opportunities. Advisory boards vary in focus, with some addressing coastal-specific concerns and others considering broader environmental issues. Importantly, these councils are not always formally incorporated into the state’s NOAA-approved CZMP.
- **Governance Boards with Decision-Making Authority** – Only three states – California, North Carolina, and Rhode Island – have governance boards with significant decision-making authority as part of their federally approved CZMPs.

Policymaking governance boards afford members greater influence and autonomy in implementing policies but may differ in scope and structure. For example, California operates with two distinct boards (the California Coastal Commission and the San Francisco

⁸ The coastal management programs for the U.S. territories were not included for the purposes of this analysis.

Bay Conservation and Development Commission) to manage its extensive coastline, whereas Rhode Island relies on a single governance council. California’s dual-council approach is reflective of its larger and more complex coastal management needs, whereas Rhode Island manages its coastal resources through a single council with regulatory authority.

While these governance categories provide a useful framework, the specific design and implementation of CZMPs vary widely among states. This diversity reflects differences in coastal geography, political structures, and program priorities, making direct comparisons between states inherently complex.

Structure of Neighboring States: Massachusetts and Connecticut

Neighboring New England states, Massachusetts and Connecticut, implement their approved CZMPs through larger environmental agencies, with dedicated offices responsible for coastal program administration. Unlike Rhode Island’s approach, the boards in Massachusetts and Connecticut are only advisory in nature and do not have any formal decision-making authority.

A Closer Look: Massachusetts

The Massachusetts Coastal Management Program, approved in 1978, is administered by the Office of Coastal Zone Management within the Executive Office of Energy and Environmental Affairs (EEA), which incorporates energy resources, environmental protection, and public utilities under the same overarching department. While the Massachusetts program operates primarily as a single-agency model, NOAA also considers the program to be networked because “departments and divisions within [the] EEA [are directed] to assist in the implementation of the coastal program.”⁹

While this report categorizes coastal programs based on the dimensions of direct versus networked models and the council structure, significant variation exists in how these structures function in practice. Even states with similar structural frameworks may implement their programs in distinctly different ways. Unlike Rhode Island, Massachusetts’s program does not issue permits directly. Instead, it directly manages the federal consistency process, ensuring that federal actions align with the state’s coastal management policies.¹⁰ The program provides coordination and technical assistance to other state agencies and local governments that hold regulatory and permitting authorities over coastal development.

⁹ [History of the Massachusetts Office of Coastal Zone Management](#)

¹⁰ [NOAA Office for Coastal Management, Federal Consistency Overview](#)

Massachusetts also has advisory councils related to coastal management, including the Massachusetts Ocean Advisory Commission. The Ocean Advisory Commission “assists the Secretary of Energy and Environmental Affairs with developing the Massachusetts Ocean Management Plan by holding public meetings and making recommendations for plan management and development.”¹¹ The 18-member commission includes legislators, agency heads, and representatives from commercial fishing organizations, environmental organizations, offshore renewable energy, and coastal regional planning agencies. Through membership on this commission, other boards are able to advise on ocean related matters.

A Closer Look: Connecticut

Connecticut’s Coastal Management Program, approved in 1980, is a single-agency model administered by the Department of Energy and Environmental Protection. In a manner similar to Massachusetts, this department integrates energy resources, environmental protection, and public utilities under a single administrative umbrella. Unlike Massachusetts, Connecticut’s program does have direct permitting authority for all activities conducted in tidal wetlands and in tidal, coastal, or navigable waters. Development of the shoreline, however, is regulated at the local level. This differs from Rhode Island, where CRMC has authority for permitting activities in the water and on land. In Connecticut, municipal planning and local zoning boards and commissions make development decisions on the land following the policies of the state’s coastal management act and with technical assistance and oversight provided by the state coastal management program staff.

While not part of Connecticut’s federally approved CZMP, there are several advisory councils that help inform decisions along the coast. These include the Long Island Sound Blue Plan Advisory Committee, the Connecticut Fisheries Advisory Council, and municipal/regional councils. The Conservation Advisory Council advises on management of natural resources across the state, and the Fisheries Advisory Council advises on issues and problems related to both marine and inland fisheries resources.

Program Comparisons

While there is no definitive ranking system for the quality of CZMPs, discussions with NOAA and CRMC provided insights into federal perspectives. NOAA leadership highlighted the benefits of having a centralized location in government responsible for coastal zone management, as well as the importance of retaining some form of council or advisory board to ensure a strong public participatory process. In these discussions, NOAA specifically described Rhode Island and California’s programs as “strong” within the National Coastal

¹¹ [Massachusetts Ocean Advisory Commission](#)

Zone Management Program, attributing this to their council structures. CRMC leadership echoed this perspective, emphasizing the strengths of Rhode Island's current CZMP.

Despite some expressions of the strengths of Rhode Island's program, previous NOAA reports, stakeholder feedback, and journalistic publications have identified potential areas for improvement, including aspects of the council structure, permitting, and contingency planning for professional staff.¹² These observations suggest that while the program is highly regarded by NOAA, opportunities exist to further improve its effectiveness.

Federal Approval Requirements for Coastal Management Program Changes

Rhode Island's federally approved CZMP is administered in partnership with NOAA. Any substantive structural modifications of CRMC, whether transitioning it into a state department or integrating it with DEM, would be classified as a "program change" under CZMA regulations, requiring formal submission, federal review, and NOAA approval before implementation. Failure to obtain NOAA approval affects the state's ability to exercise federal consistency authority under the CZMA and could impact eligibility for related federal funding.

Although NOAA does not mandate a specific sequence for obtaining approval, federal regulations ([15 CFR 923.81](#)) encourage states to engage with NOAA before enacting legislative changes that would alter a coastal management program. Early coordination allows NOAA to identify potential compliance issues in advance, providing the state with an opportunity to address concerns proactively and refine its proposal before formal submission, helping to ensure a smoother approval process.

Following legislative enactment of any restructuring, the state must formally submit the proposed changes to NOAA for final approval before they can be incorporated into the RICZMP. NOAA is generally required to issue a decision within 30 days of receiving a complete submission, but this period may be extended:

- Up to 120 days if additional evaluation is required.
- Beyond 120 days if NOAA determines that a more detailed environmental review is necessary under the National Environmental Policy Act (NEPA), potentially requiring an Environmental Assessment (EA) or an Environmental Impact Statement (EIS).

¹² Previous NOAA reports refer to [NOAA Final Evaluation Findings March 2020](#) and [NOAA Final Evaluation Findings August 2010](#)

If NOAA determines the change is of such significance that it would not be covered by the NEPA Categorical Exclusion that NOAA uses for most program changes, NOAA would have to produce an EA or an EIS.

Before NOAA formally approves the proposed restructure, Rhode Island must post a notice of the program change on its website to allow for public and agency feedback. The public comment period officially begins once the notice is posted, and NOAA reviews and considers this input before issuing a final decision.

Key considerations in NOAA's approval process include whether the structural change aligns with CZMA national interest objectives,¹³ affects federal consistency authority,¹⁴ or necessitates modifications to enforceable policies. NOAA reviews whether the revised structure supports public participation, maintains interagency coordination, and remains consistent with federal coastal management requirements.¹⁵ Additionally, NOAA must ensure that the designated state agency responsible for implementing the program retains sufficient authority to administer and enforce the program's enforceable policies effectively.

If NOAA determines that a proposed change does not meet federal requirements, it may deny approval.

Community Stakeholder Engagement

As part of the development of this report, OMB conducted a survey to gather perspectives from key stakeholders. In September 2024, a survey was distributed to organizations identified by CRMC and DEM as having regular interactions with CRMC. A complete list of contacted organizations and survey respondents is provided in Appendix E. Of the 23 organizations that were sent the survey, 15 responded, representing a 65 percent response rate. Respondents included organizations such as Save the Bay, the Rhode Island Builders Association, and the Rhode Island Chapter of the American Planning Association.

Stakeholder Survey Findings

Survey participants were asked to provide both positive feedback and suggestions for improvement regarding CRMC and DEM. CRMC staff received favorable comments, with some respondents noting their strong institutional knowledge. Staff were described as

¹³ As described in 16 U.S.C. § 1451. Congressional findings (Section 302) and 16 U.S.C. § 1452. Congressional declaration of policy (Section 303)

¹⁴ 16 U.S.C. § 1456. Coordination and cooperation (Section 307)

¹⁵ 16 U.S.C. § 1455(d). Mandatory Adoption of State Management Program for Coastal Zone

“professional,” “hard-working,” and “effective,” reflecting a high degree of confidence in their expertise and capabilities.

The most common theme for improvement regarding CRMC was the council structure. Of those stakeholders that completed the survey, 11 respondents provided a response to the question of how to improve CRMC operations and structure. Of those 11, nine (82 percent) identified various issues with the council itself as a key area for improvement. Specific concerns included the politically appointed nature of the council, a lack of sufficient training or background among members to make informed decisions, frequent meeting cancellations due to lack of quorum, and dissatisfaction with past decisions.

Additional suggestions from respondents included establishing full-time in-house legal services, re-establishing the Fisheries Advisory Board, and addressing lengthy processing times.

DEM received praise for its structure, policies, and staff. Respondents described DEM staff as “helpful,” “responsive,” “accessible,” “transparent,” and “professional.” While areas for improvement varied, common examples included insufficient enforcement staffing, overly centralized decision-making, and concerns about the structure of the RIMFC.

Perceived Overlapping Responsibilities and Stakeholder Recommendations

Opinions on the current structure of CRMC and DEM varied among respondents. Some identified overlapping responsibilities between the two agencies, particularly in areas such as marine fisheries, aquaculture, permitting, enforcement, wetlands, species management, water quality, public access, and habitat restoration. As one example, some respondents noted that while one agency promotes the commercial fishing industry and the other promotes aquaculture, both also have regulatory and conservation responsibilities in these areas. They suggested that these dual roles could create conflicts or inefficiencies and recommended clearer separation between these functions.

Among those who expressed concerns about overlapping authority, recommendations included integrating CRMC within DEM, implementing joint permitting processes, advancing MOUs for enforcement, and ensuring that regulatory and promotional roles remain distinct.

Respondents overwhelmingly emphasized that any changes to the current structure should preserve staffing levels and funding from both state and federal sources. They also stressed that transparency and open communication with the public must remain a priority, regardless of any structural adjustments.

Stakeholder Engagement: NOAA

NOAA is currently preparing its CZMA Section 312 findings on the recent evaluation of Rhode Island's CZMP, formally known as the Rhode Island Coastal Resources Management Program (RICRMP). The NOAA evaluation, expected to be released in early 2025, was not yet available during the drafting of this report. These findings will provide insights into the implementation of Rhode Island's federally approved CZMP but will not address potential organizational changes to the program.

In late October 2024, members of OMB met with NOAA representatives to discuss a range of topics, including the structure of CRMC, Rhode Island's CZMP, the organizational frameworks of CZMPs in other states, and the CZMA federal consistency process.¹⁶ NOAA's participants included the North Regional Director for the Office for Coastal Management, a Program Analyst, a Senior Policy Analyst, and a Federal Consistency Specialist.

NOAA highlighted potential disadvantages for Rhode Island if it were to transition to a networked structure. NOAA representatives noted that "states that have a central state agency or commission...tend to be stronger programs due to the efficiency of a single point of decision-making for regulatory and planning efforts." While NOAA acknowledged that networked programs can be effective, they emphasized that such models lack the efficiencies associated with a unified agency. Additionally, NOAA observed that some CZMPs originally structured around politically appointed councils or advisory boards have transitioned over time to more streamlined state agency structures.

NOAA commended CRMC for its high level of transparency, particularly its facilitation of public participation through open meetings. Public engagement is a foundational tenet of the CZMA, and NOAA advised that any structural changes to CRMC should maintain public participation and transparency, even if these mechanisms differ from the current framework.

While NOAA recognized CRMC's strengths, they also identified areas for potential improvement. Challenges mentioned included the difficulties in achieving quorums for council meetings, delays in addressing critical matters, and insufficient training for council members. Although some progress has been made in these areas, improvements have been inconsistent. Additionally, NOAA noted that access to legal counsel, while improved, remains an area requiring continued attention.

NOAA emphasized the importance of close collaboration between the state and the NOAA Office for Coastal Management when considering any structural changes to CRMC. This collaboration is essential given the federal-state partnership established through the

¹⁶ [NOAA Office for Coastal Management, Federal Consistency Overview](#)

National Coastal Zone Management Program, which funds approximately 34 percent of CRMC's budget. When asked about the potential approval process for structural changes, NOAA indicated that it could provide more specific feedback and assess the likelihood of federal approval once a comprehensive draft proposal had been developed. In the interim, NOAA shared general insights into effective program structures observed in other states, offering valuable context for evaluating potential changes.

Options for Consideration

This section addresses Resolution S 3149's request for a comprehensive review of the structure of CRMC and assessing the possibility of either making it a standalone department or merging it with DEM. This report employs fiscal analysis to assess the financial and structural impacts of each scenario.

A fiscal analysis of the proposed restructuring of CRMC as a standalone department, originally outlined in the May 2024 fiscal note for bill [2024-H 8148](#), is included in Appendix F.

Each option integrates stakeholder feedback and considers factors such as public participation, interagency coordination, and compliance with federally approved coastal zone management standards. While the following sections present four distinct options, each includes recommendations and considerations that policymakers may find applicable across multiple scenarios.

Option 1: CRMC Maintains Its Existing Governance Model

Under Option 1, CRMC would continue to operate under its current governance structure, which includes a 10-member council supported by a professional staff of 32 full-time employees. This structure has been recognized by NOAA as meeting federal CZMP standards, which is critical for maintaining compliance and securing federal funding.

The governance council serves as a platform for public participation in decision-making, with meetings conducted in compliance with Rhode Island's Open Meetings Act. Stakeholder feedback highlights both strengths and areas for improvement within this model. While some respondents acknowledged the council's role in facilitating public engagement, others noted challenges such as quorum issues, inconsistencies in decision-making, and gaps in council member expertise. NOAA has similarly raised concerns about governance inefficiencies, including delays in critical decisions and the need for improved training for council members.

Maintaining CRMC's existing structure ensures continuity and preserves a federally compliant framework. However, persistent governance challenges, particularly regarding council composition and quorum reliability, continue to raise concerns about operational efficiency. These issues have contributed to delays and inconsistent regulatory outcomes, affecting stakeholder confidence in the system's effectiveness.

Although CRMC and DEM report effective interagency coordination, some stakeholders surveyed reported that they perceived inefficiencies and redundancies in their overlapping responsibilities. Whether or not these concerns reflect actual operational barriers, they highlight ongoing frustrations with the regulatory process. Additionally, continuing with the existing structure would not affect permitting procedures nor improve the customer experience for applicants navigating coastal regulations.

Fiscal Impact

This option represents a fiscally neutral approach, as CRMC would retain its current budget and staffing levels.

In FY 2025, CRMC's enacted budget totaled \$6.2 million, including \$3.6 million in general revenue. Under Governor McKee's FY 2026 Recommended Budget, CRMC's funding would increase to \$9.7 million, which includes \$3.7 million in general revenue, \$3.3 million in federal funds, \$0.6 million in restricted receipts, and \$2.0 million from the Rhode Island Capital Plan (RICAP) fund.

In 2024, CRMC requested \$2.0 million for an electronic permitting system upgrade, which has previously identified as an area for improvement. Because the cost of a permitting system upgrade will depend on specific system requirements, it is not included in these estimates.

Recommendations for Consideration

While Option 1 preserves CRMC's current governance framework, two modest adjustments could enhance its effectiveness:

1. **Council Restructuring:** Adjusting the council structure could improve its functionality by augmenting the number of seats, modifying the stringent requirements for membership to include various stakeholder perspectives, and adopting an odd number of seats — a standard practice for voting boards to avoid ties. These changes could help alleviate difficulties in achieving quorums, ensure a broader and more diverse pool of potential council members, and strengthen decision-making efficiency. Any changes to the council structure would require legislative approval.

2. **Lean Process Improvement Evaluation:** CRMC could consider undertaking a Lean process improvement evaluation, similar to an analysis conducted by DEM for its Marine Fisheries Council process. According to DEM, this evaluation helped to streamline RIMFC's operations, saving valuable staff time and resources that were redirected to more mission-critical functions.

Option 2: CRMC Becomes a Standalone Department

Under Option 2, CRMC would transition into the Department of Coastal Resources (DCR), a standalone state agency. This structural change would dissolve the existing governance council, shifting decision-making authority to a governor-appointed director supported by an expanded professional staff. The goal of this transition is to centralize authority, streamline governance, and enhance operational efficiency, addressing identified limitations in the current structure.

A fiscal note produced by the Budget Office in May 2024 provided a baseline evaluation of this option, outlining its financial and operational implications. Several elements of that analysis were incorporated into this review to ensure consistency in evaluating the transition.

The primary structural shift—replacing the governance council with a director-led model—aims to resolve challenges such as quorum issues and inconsistent regulatory rulings, enabling a more streamlined regulatory process. However, maintaining public engagement remains a critical consideration, particularly for compliance with NOAA's Coastal Zone Management Program. Establishing an advisory board or a similar mechanism would be necessary to preserve transparency and stakeholder input.

While governance improvements are a key benefit of this restructuring, jurisdictional overlaps with DEM would remain unresolved. Individuals and organizations navigating coastal development projects may still need approvals from both agencies, perpetuating procedural complexities and inefficiencies. This structural change does not inherently simplify interagency coordination or regulatory requirements.

Organizational and Operational Changes

The transition to a standalone department would eliminate the governance council, resolving challenges such as quorum issues. To ensure continued stakeholder input, an advisory board could be established, comprising representatives from key constituencies, such as relevant industries, environmental advocates, labor organizations, and municipal leadership. While this board would lack regulatory authority, it would provide an outlet for public input and non-binding recommendations to support informed decision-making.

An expanded professional staff would assume the council's current responsibilities for regulation, enforcement, and policy. Per the fiscal note, this expansion would necessitate staffing increases to accommodate the department's broader responsibilities, including hiring at least two full-time attorneys to manage regulatory and enforcement duties internally, thereby reducing reliance on external legal counsel. CRMC indicates that they would also require some additional administrative and technical positions to manage the increased workload.

However, this reorganization would not change the existing interagency processes or address jurisdictional overlaps with DEM. Stakeholders would still need to interact through the policies, processes, and procedures both agencies, just as they do now. While current CRMC and DEM leadership report effective communication, the procedural complexity of these interagency processes would persist under this model, potentially leading to delays and confusion for customers.

Fiscal Impact

Transitioning CRMC into DCR would introduce new costs, primarily related to staffing expansion and administrative infrastructure. The extent of these costs would depend on the final structure and resource levels determined by policymakers.

To assume the responsibilities previously managed by the governance council, DCR would require at least seven new full-time positions, including staff attorneys, policy analysts, administrative clerks, and a hearing officer. This lower-bound staffing scenario would increase personnel costs by approximately \$1.1 million in FY 2026.

A more expansive model, which accounts for broader operational needs, would require 15 additional positions, including staff attorneys, policy analysts, enforcement staff, administrative clerks, fiscal staff, and a hearing officer, bringing the personnel cost increase to approximately \$1.7 million in FY 2026.

By bringing legal services in-house, external legal counsel would no longer be needed, resulting in an estimated \$200,000 in annual savings.

With CRMC's current office space at capacity, additional workspace would be required. Based on FTE counts and state leasing estimates, increased facility costs are projected to range between \$39,000 to \$218,000 annually. Administrative costs for new staff — including IT and office supplies — are estimated between \$16,000 and \$35,000 annually, following the May 2024 fiscal note methodology. A one-time allocation of between \$50,000 and \$200,000 is recommended for planning and transition expenses.

The estimated additional cost of transitioning CRMC to DCR falls between \$1.0 million and \$1.9 million annually, depending on final staffing levels and facility investments. These estimates reflect a range of financial impacts, allowing policymakers to assess the appropriate level of resources for the new department.

Under the Governor's FY 2026 recommended budget, CRMC's operations are funded with approximately \$3.7 million in General Revenue under the existing governance structure. If policymakers elect to transition CRMC into a standalone department using a model based on Option 2, General Revenue allotment would need to increase to a range of between \$4.7 million and \$5.6 million in FY 2026 to accommodate the additional personnel, facility, and administrative costs associated with the new department structure.

Recommendations for Implementation

If policymakers pursue this option, the following considerations would enhance its effectiveness:

1. **Establishment of an Advisory Board** – To address NOAA's emphasis on strong public participation and stakeholder concerns about losing direct input, the legislature could mandate the creation of an advisory board. This advisory structure would provide a forum for non-binding recommendations and ensure continued public engagement in coastal policy decisions.
2. **Enhance Federal Coordination** – Policymakers and agency leadership should engage with NOAA early in the transition process to confirm that any new structure complies with CZMA requirements and retains eligibility for federal funding. Establishing a collaborative framework with NOAA would help align governance changes with federal expectations and minimize disruptions.
3. **Stakeholder Outreach** – Policymakers could hold public forums and targeted outreach to address concerns about the loss of direct public participation and gather input on the restructuring process.

Option 3: CRMC Becomes a Bureau Within DEM

Under this option, CRMC would be integrated into DEM as a Bureau of Coastal Management, maintaining its core functions while eliminating its status as an independent agency. The governance council would be dissolved or transitioned into an advisory role, with regulatory and administrative authority shifting to DEM's leadership. This approach preserves a distinct coastal management unit within DEM, ensuring continued focus on Rhode Island's coastal policy and regulatory responsibilities while benefiting from broader agency coordination.

This structure resembles Massachusetts's Office of Coastal Zone Management, which operates within the Executive Office of Energy and Environmental Affairs while remaining separate from other environmental organizations. However, unlike the Massachusetts model, which operates as a networked system with multiple departments contributing to program implementation, Rhode Island's DEM has fewer bureaus and this transition would place all coastal management functions within a single entity.

Merging CRMC into DEM would consolidate environmental oversight while retaining specialized coastal expertise. The shift in decision-making authority to DEM leadership would streamline regulatory functions by eliminating the governance council's role, but it would not fully resolve jurisdictional complexities. Applicants may still require approvals from multiple DEM divisions, particularly for projects involving both coastal and freshwater resources, potentially maintaining some regulatory inefficiencies.

Organizational and Operational Changes

Under this scenario, the Bureau of Coastal Management would retain CRMC's coastal policy, planning, and permitting functions, while administrative operations such as finance, human resources, and IT would be consolidated within DEM's existing structure to enhance efficiency.

The CRMC director position would transition to a bureau chief, responsible for overseeing regulatory, enforcement, and policy functions currently managed by CRMC. As previously noted, the Executive Director of CRMC is presently appointed directly by and accountable to the Governor. Policymakers would need to decide whether this position should remain an appointed role or be shifted into the classified service.

The majority of CRMC's existing FTEs, including permitting and enforcement staff, would transition to this new DEM bureau, ensuring continuity in decision-making and program administration.

Transitioning to a new organizational structure may result in short-term disruptions to CRMC operations, potentially causing temporary delays for customers. The transition period could involve staff realignments and adjustments to organizational workflows, leading to some initial inefficiencies as processes are reviewed and standardized. Additionally, the transition would incur one-time costs, including potential relocation expenses and IT system integration.

This model eliminates the CRMC council's decision-making authority, shifting final regulatory determinations to DEM's director. As with Option 2, to ensure continued stakeholder engagement, an advisory board could be established, providing non-binding input on coastal management policy. This board would include representatives from key constituencies such

as labor, local government, industry, environmental advocacy groups, and coastal communities.

While Option 3 enhances coordination between coastal and broader environmental management efforts, it does not fully eliminate regulatory and operational overlap. Some stakeholders may still need to obtain approvals from multiple DEM bureaus for projects involving both coastal and freshwater resources. DEM's Office of Customer and Technical Assistance (OCTA) would likely play a key role, as it currently assists applicants in navigating multiple permits and resolving inconsistencies across DEM's bureaus.

Under this model, OCTA would help coordinate permitting and regulatory processes within DEM, facilitating interactions between the new Bureau of Coastal Management and other DEM divisions. Strengthened internal coordination, standardized forms and procedures, and potential co-location of relevant staff could further mitigate challenges with integration.

Fiscal Impact

Merging CRMC into DEM would introduce some new costs, primarily related to staffing adjustments, operational integration, and administrative restructuring – though less than creating a standalone agency (Option 2). The extent of these costs depends on how functions are distributed within DEM and the level of additional support provided to accommodate the transition.

To manage the responsibilities previously handled by the governance council, this approach would require approximately five new full-time positions, including staff attorneys, a hearing officer, and administrative clerks. Under this lower-bound staffing scenario, personnel costs would increase by approximately \$870,000 in FY 2026.

A broader staffing model, reflecting a more robust regulatory and enforcement presence within DEM, would require seven additional positions, including staff attorneys, a hearing officer, enforcement staff, and administrative clerks. Under this upper-bound staffing scenario, personnel costs would rise to \$1.1 million in FY 2026.

By insourcing legal services, DEM would no longer need to retain external legal counsel for CRMC-related matters, generating an estimated \$200,000 in annual savings.

Based on FTE counts and state leasing estimates, facility costs are projected to range from \$28,000 to \$181,000 annually, depending on final staffing levels. Administrative costs—including IT and office supplies—are estimated to increase between \$12,000 and \$16,000 annually, based on per-employee cost models. A one-time allocation of between \$50,000 and \$200,000 is recommended for planning and transition expenses, including logistical and operational adjustments. The estimated additional cost of merging CRMC into DEM falls

between \$800,000 and \$1.3 million annually, depending on final staffing levels and facility investments.

This estimate does not include the cost of IT system integration; however, migrating CRMC data to DEM's electronic permitting system may be more cost-effective than procuring a standalone CRMC system, which CRMC had requested in 2024.

While this approach does not generate immediate cost reductions, integrating CRMC's administrative functions – such as HR, finance, and IT – into DEM's existing systems may yield modest long-term savings through staff attrition and streamlined operations. Over time, consolidating regulatory functions within DEM could reduce administrative redundancy, improve coordination, and enhance operational efficiency.

If policymakers elect to transition CRMC into a DEM bureau using a model based on Option 3, General Revenue allotment would need to increase from \$3.7 million to a range of \$4.5 million to \$5.0 million in FY 2026 to accommodate the additional personnel, facility, and administrative costs associated with the new structure.

Recommendations for Implementation

If state policymakers choose to integrate CRMC into DEM as a Bureau of Coastal Management, the following actions would help ensure a more effective transition:

1. **Establishment of an Advisory Board** – As with Options 2 and 4, to address NOAA and stakeholder concerns regarding public participation, the legislature could mandate the creation of an advisory board to ensure ongoing stakeholder engagement in coastal management decisions. This advisory structure would provide a forum for non-binding recommendations, aligning with NOAA's emphasis on maintaining strong public participation mechanisms.
2. **Enhance Federal Coordination** – Policymakers and agency leadership should engage with NOAA early in the transition process to confirm that the new structure complies with CZMA requirements and retains eligibility for federal funding. Establishing a collaborative framework with NOAA would help align governance changes with federal expectations and minimize disruptions.
3. **Implement a Structured Transition Plan** – Any significant reorganization should be guided by a comprehensive transition plan. For Option 3, a transition plan would outline workflow realignments, staff reassignments, IT system integration, and strategies to minimize operational disruptions. Additionally, it should include a communication plan with NOAA to address program changes and ensure compliance with federal requirements.

Option 4: CRMC Fully Integrated into DEM

Under this option, CRMC would be fully integrated into DEM, eliminating its independent operations and largely consolidating its functions within DEM's existing structure. This transition would dissolve the CRMC council or shift it into an advisory role, with all regulatory, administrative, and enforcement responsibilities absorbed by DEM. To preserve coastal management expertise, a Division of Coastal Management would be established within DEM, separate from the existing Division of Coastal Resources, which oversees state-owned piers and supports commercial fishing and aquaculture.

While some CRMC staff would remain within this division to oversee specialized coastal functions, most would be reassigned to relevant DEM divisions, such as the Division of Fish and Wildlife, the Division of Marine Fisheries, and the Office of Water Resources, based on their expertise. As with Option 3, policymakers would need to decide whether the existing CRMC Executive Director position should remain an appointed role or be shifted into the classified service.

The goal of this restructuring would be to unify Rhode Island's coastal and environmental management under a single agency, improving coordination, reducing redundancy, and enhancing efficiency while ensuring that CRMC's specialized knowledge remains a focal point within DEM's broader regulatory framework. This model is similar to Connecticut's approach, where coastal management is housed within a broader environmental division, though Connecticut's system also incorporates more localized decision-making.

A full integration of CRMC into DEM represents the most comprehensive restructuring option, dissolving CRMC's independent identity and embedding its functions across existing DEM divisions. While this consolidation would improve regulatory coordination and reduce bureaucratic redundancies, it raises concerns about the loss of a distinct coastal management focus within state government. NOAA has identified maintaining a dedicated coastal entity as a best practice and ensuring that coastal policy remains a priority within DEM would require clearly defined responsibilities within the reorganized structure.

Organizational and Operational Changes

Under this option, CRMC's functions would be fully merged into DEM, with key adjustments to governance, staffing, and administrative structures. The establishment of a Division of Coastal Management within DEM would serve as a dedicated unit responsible for core coastal policy, planning, and federal compliance. This office would provide continuity in mission-critical areas such as offshore wind project review, shoreline management, and CZMP compliance.

The majority of CRMC's staff would be reassigned to existing DEM divisions to improve interagency coordination and reduce functional overlaps. Coastal wetlands staff and enforcement staff, for example, would be integrated into DEM's water resources office and compliance division, respectively, ensuring alignment with the agency's broader regulatory processes. Other administrative functions, including finance and human resources, would be consolidated within DEM's existing operational infrastructure.

This approach would also fully dissolve CRMC's governance council. As in Option 3, an advisory board could be established to provide stakeholder input and maintain public engagement in coastal management policy. However, unlike the current council, this board would not hold regulatory authority, instead serving in a consultative capacity to inform DEM's decision-making.

As with Option 3, transitioning to a new organizational structure may cause some short-term disruptions to CRMC operations, potentially causing temporary delays for customers. The transition period could involve staff realignments and adjustments to organizational workflows, leading to initial inefficiencies as processes are reviewed and standardized. Additionally, the transition would incur one-time costs, including potential relocation expenses and IT system integration.

With CRMC fully integrated into DEM, its customers would be supported by DEM's Office of Customer and Technical Assistance (OCTA), which serves as a single point of contact for navigating permits and regulatory requirements across the agency.

By embedding CRMC's functions into DEM, this option aims to streamline coastal management processes while retaining key institutional expertise within a structured and centralized framework.

Fiscal Impact

Fully integrating CRMC into DEM would introduce some new costs, primarily related to staffing adjustments, administrative realignment, and IT integration restructuring – though less than creating a standalone agency (Option 2) or a dedicated DEM bureau (Option 3). The extent of these costs depends on how CRMC's functions are distributed across DEM's divisions and the level of operational support required during the transition.

To absorb the responsibilities previously handled by the governance council, this approach would require at least three additional full-time positions, including a hearing officer and staff attorneys to manage regulatory and enforcement functions. Under this lower-bound staffing scenario, personnel costs would increase by approximately \$640,000 in FY 2026.

A broader staffing model could require five additional positions, including enforcement staff and an administrative clerk to support increased permitting and compliance workloads. Under this upper-bound staffing scenario, personnel costs would rise by approximately \$870,000 in FY 2026.

By insourcing legal services, DEM would no longer need to retain external legal counsel for CRMC-related matters, generating an estimated \$200,000 in annual savings.

Since CRMC personnel would be fully absorbed into DEM's existing divisions, the need for additional office space would be minimal. Based on FTE counts and state leasing estimates, facility costs are projected to range between \$17,000 and \$171,000. Administrative costs—including IT and office supplies—are estimated to increase between \$7,000 and \$12,000 annually, based on per-employee cost models. A one-time allocation of between \$50,000 and \$200,000 is recommended for planning and transition expenses, including logistical and operational adjustments.

As with Option 3, estimate does not include the cost of IT system integration; however, migrating CRMC data to DEM's electronic permitting system may be more cost-effective than procuring a standalone CRMC system, which CRMC had requested in 2024.

While this approach does not generate immediate cost reductions, consolidating CRMC's operational, enforcement, and administrative functions within DEM's existing framework may yield long-term savings through attrition, process efficiencies, and reduced administrative redundancy. Over time, aligning coastal management within DEM could streamline regulatory coordination and improve operational oversight.

The estimated additional cost of fully integrating CRMC into DEM falls between \$500,000 and \$1 million annually, depending on final staffing levels and transition costs. While this approach introduces short-term administrative and IT integration expenses, the potential for long-term savings through centralized operations and efficiency improvements is greater than in other restructuring models.

If policymakers elect to transition CRMC into DEM using a model based on Option 4, General Revenue allotment would need to increase from \$3.7 million to a range of \$4.2 million to \$4.7 million in FY 2026 to accommodate the additional personnel, facility, and administrative costs.

Recommendations for Implementation

If state policymakers decide to fully integrate CRMC into DEM, the following actions would help ensure a more effective transition:

1. **Establishment of an Advisory Board** – As with Options 2 and 3, to address NOAA and stakeholder concerns regarding public participation, the legislature could mandate the creation of an advisory board to ensure ongoing stakeholder engagement in coastal management decisions. This advisory structure would provide a forum for non-binding recommendations, aligning with NOAA’s emphasis on maintaining strong public participation mechanisms.
2. **Implement a Structured Transition Plan** – As described in Option 3, a comprehensive transition plan would be essential for integrating CRMC into DEM. This plan should outline workflow realignments, staff reassignments, IT system integration, and strategies to minimize operational disruptions. Additionally, it should include a communication plan with NOAA to address program changes and ensure compliance with federal requirements.
3. **Enhance Federal Coordination** – Policymakers and agency leadership should engage with NOAA early in any transition process to confirm that the new structure complies with CZMA requirements and retains eligibility for federal funding. Establishing a collaborative framework with NOAA would help align governance changes with federal expectations and minimize disruptions.

Appendices

- Appendix A – S 3149
- Appendix B – CRMC Organizational Chart
- Appendix C – DEM Organizational Chart
- Appendix D – Wetlands Jurisdictional Map
- Appendix E – Stakeholder Survey Distribution List
- Appendix F – Fiscal Note for H 8148
- Appendix G – Acronym and Initialism Dictionary

Appendix A:

S 3149

STATE OF RHODE ISLAND

IN GENERAL ASSEMBLY

JANUARY SESSION, A.D. 2024

SENATE RESOLUTION

RESPECTFULLY REQUEST THE DEPARTMENT OF ADMINISTRATION (DOA) TO UNDERTAKE A REVIEW AND ANALYSIS OF THE COASTAL RESOURCES MANAGEMENT COUNCIL

Introduced By: Senators Sosnowski, DiMario, Euer, and Gu

Date Introduced: June 10, 2024

Referred To: Placed on the Senate Consent Calendar

1 WHEREAS, Rhode Island is the "Ocean State" with 400 miles of shoreline along the
2 Narragansett Bay and the Atlantic Ocean; and

3 WHEREAS, Rhode Island's beautiful shorelines are enjoyed by residents and tourists
4 alike; and

5 WHEREAS, Rhode Island relies upon these shorelines and coastal waters to support the
6 State's economy from its vibrant tourism sector to the seafood industry; and

7 WHEREAS, In order to preserve and protect the State's coastal waters, the Rhode Island
8 Coastal Resources Management Council and Department of Environmental Management work
9 prudently to ensure that the State's shorelines are maintained and properly developed; and

10 WHEREAS, The structure of these entities must be reviewed to determine if their
11 structures meet the current needs and those of the future; now, therefore be it

12 RESOLVED, That this Senate of the State of Rhode Island hereby respectfully requests
13 that the Department of Administration (DOA) undertakes a review and analysis of the Coastal
14 Resources Management Council in order to determine:

- 15 • The cost-benefit analysis if the Coastal Resources Management Council became a
16 department of the State;
17 • The cost-benefit analysis if the Coastal Resources Management Council merged with
18 the Rhode Island Department of Environmental Management;
19 • An analysis of the current operating structure of the Coastal Resources Management

1 Council and Rhode Island Department of Environmental Management to determine how the
2 Coastal Resources Management Council would operate as a department of the State and whether
3 overlaps in authority would be present between the two departments;

4 • An analysis of the organization structure, staffing, and resources required for the
5 Coastal Resources Management Council to operate as a standalone department of the State;

6 • An analysis of the organization structure, staffing, and resources required if the Coastal
7 Resources Management Council is merged with the Rhode Island Department of Environmental
8 Management; and

9 • What federal approvals are required from the National Oceanic and Atmospheric
10 Administration (NOAA) for the Coastal Resources Management Council to become a department
11 of the State or merge with the Rhode Island Department of Environmental Management; and be it
12 further

13 RESOLVED, That this Senate hereby requests DOA to develop recommendations as to
14 how the State should proceed with the Coastal Resources Management Council; and be it further

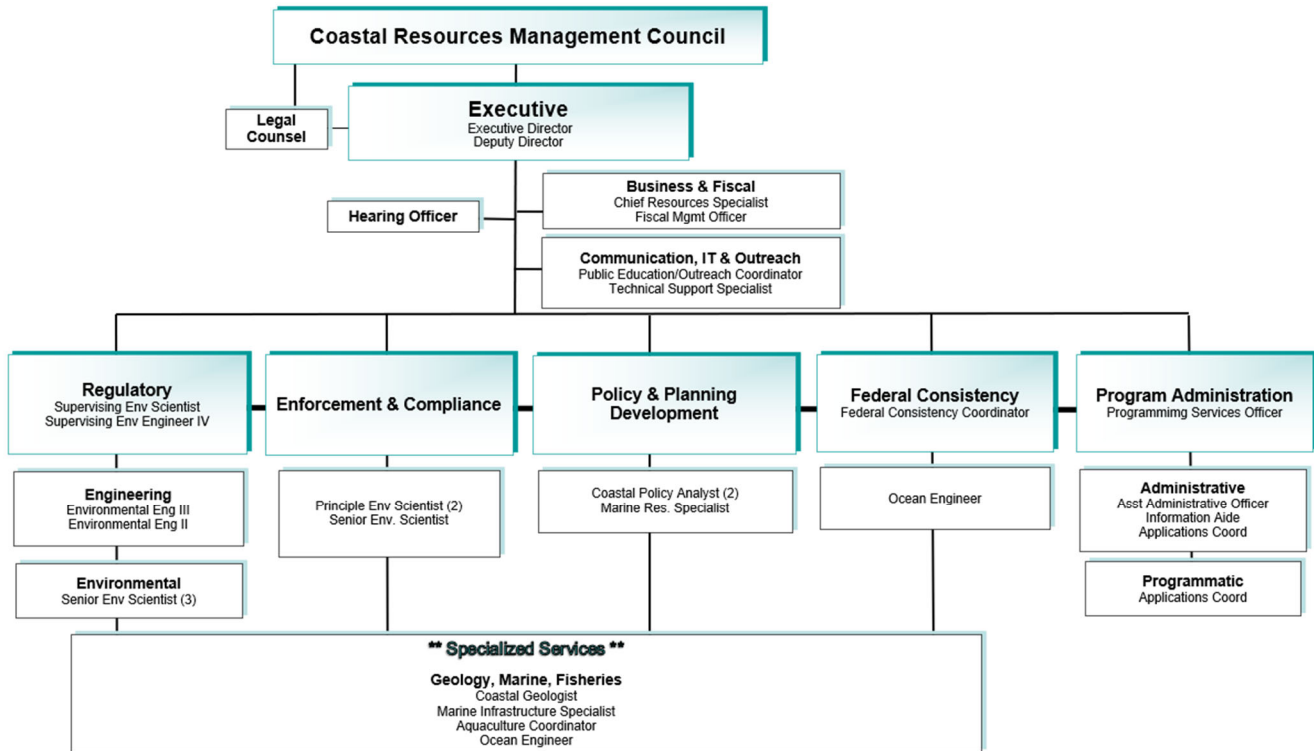
15 RESOLVED, That this Senate hereby further requests the DOA to report its findings and
16 recommendations to the Senate on or before February 1, 2025; and be it further

17 RESOLVED, That the Secretary of State be and hereby is authorized and directed to
18 transmit a duly certified copy of this resolution to the Director of the Department of
19 Administration.

=====
LC006228
=====

Appendix B: CRMC Organizational Chart

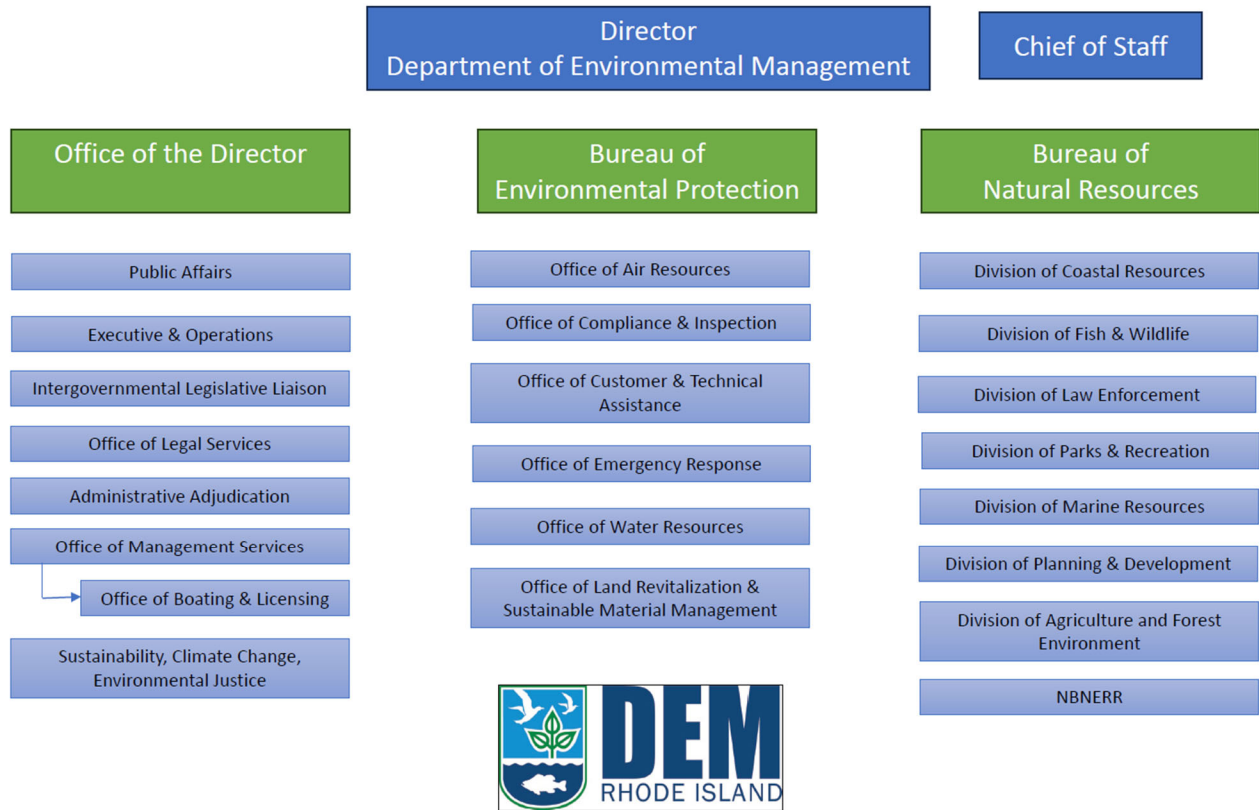
CRMC Organizational Chart



Source: CRMC

Appendix C: DEM Organizational Chart

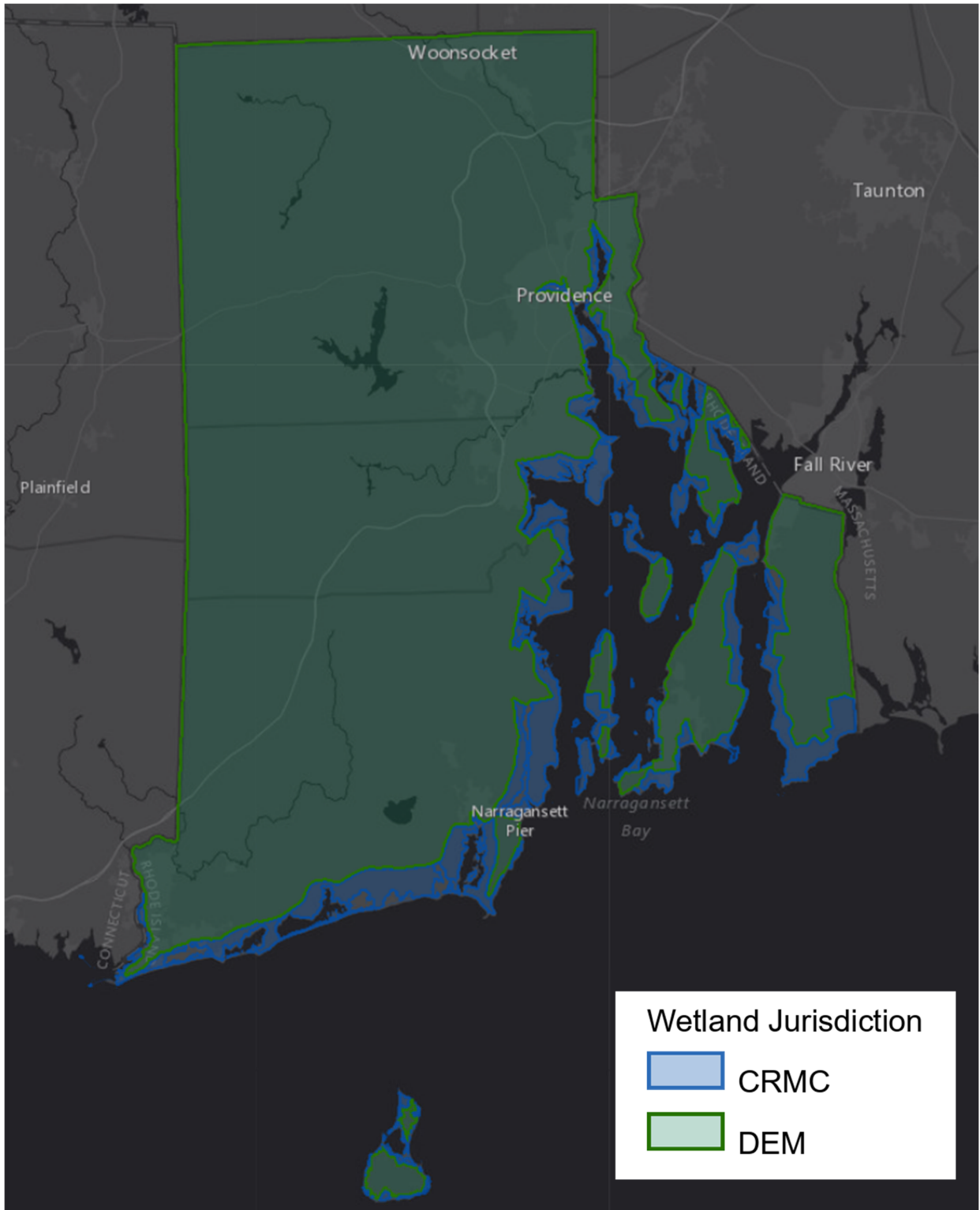
DEM Organizational Chart



Source: DEM

Appendix D: Wetlands Jurisdictional Map

Wetlands Jurisdiction Map



Source: DEM Online Map Room: <https://ridemgis.maps.arcgis.com/>

Appendix E:
Stakeholder Survey
Distribution List

Stakeholder Survey Distribution List

Key stakeholders identified by CRMC and DEM. Listed in alphabetical order.

Organization	Survey Sent	Response Received*
American Planning Association	24-Sep	10-Oct
Audubon Society of RI	24-Sep	N/A
Backcountry Hunters and Anglers	26-Sep	11-Oct
Commercial Fisheries Center of RI	24-Sep	24-Sep
East Coast Shellfish Growers Assn.	25-Sep	25-Sep
Green Energy Consumers Alliance	24-Sep	N/A
Municipal Harbor Masters Association of RI	25-Sep	9-Oct
Narrow River Preservation Association	25-Sep	N/A
New England for Offshore Wind	24-Sep	N/A
RI Commercial Rod and Reel Association	25-Sep	7-Oct
RI Nursery and Landscape Association (Coastal Invasive Plant Management Program)	25-Sep	N/A
RI Shellfisherman's Association	25-Sep	N/A
RI Association of Realtors	24-Sep	8-Oct
RI Builders Assn.	24-Sep	7-Oct
RI Hospitality Assn.	24-Sep	1-Oct
RI League of Cities and Towns	24-Sep	27-Sep
RI Marine Trades Assn.	24-Sep	N/A
RI Party and Charter Boat Assn	24-Sep	7-Oct
RI Saltwater Anglers Assn.	24-Sep	7-Oct
RI Sea Grant	24-Sep	N/A
Salt Ponds Coalition	25-Sep	1-Oct
Save the Bay	24-Sep	11-Oct
The Nature Conservancy	24-Sep	24-Sep

*"N/A" indicates no response received

Appendix F:

Fiscal Note for H 8148



OFFICE OF MANAGEMENT & BUDGET

State Budget Office

One Capitol Hill
Providence, RI 02908-5890

Office: (401) 222-6300
Fax: (401) 222-6410

State Fiscal Note for Bill Number:

2024-H 8148

Date of State Budget Office Approval: Tuesday, May 28, 2024

Date Requested: Friday, April 5, 2024

Date Due: Friday, May 17, 2024

<i>Impact on Expenditures</i>		<i>Impact on Revenues</i>	
FY 2024	N/A	FY 2024	N/A
FY 2025	\$1.2 million (min)/\$2.9 million (max)	FY 2025	N/A
FY 2026	\$1.0 million (min)/\$2.1 million (max)	FY 2026	N/A

Explanation by State Budget Office:

This bill amends Title 46, Chapter 23 of the Rhode Island General Laws (R.I.G.L.) to replace the Coastal Resources Management Council (CRMC) with the Department of Coastal Resources (DCR), establishing a new state agency and transferring the authorities, duties, and powers of the Council to this new agency and its Director.

R.I.G.L. § 46-23-1(f)(2) is the primary language transferring powers and duties vested in CRMC to DCR, and R.I.G.L. § 46-23-1(f)(3) adds definitions to the current language associated with the change. Language throughout the bill (affecting all of Title 46, Chapter 23) changes references in statute from CRMC to DCR.

R.I.G.L. § 46-23-2 is repealed as written and replaced with new statutory language that formally establishes DCR and defines the Director, who shall be appointed by the Governor. R.I.G.L. § 46-23-2(b) establishes a community advisory committee, which shall be a ten-member committee that provides input on policies and programming. Nine of these committee members will be appointed by the governor, with the tenth slot occupied by the Director serving ex officio. R.I.G.L. § 46-23-2(c) permits the Director to establish other committees related to coastal programs.

R.I.G.L. § 46-23-4 is repealed as written and replaced with language mandating a staff attorney be hired by DCR, who shall be responsible for representing DCR in all matters. The staff attorney may not practice law otherwise.

R.I.G.L. § 46-23-4.1 is heavily modified to accommodate the new structure, directing the Director to coordinate with other agencies.

R.I.G.L. § 46-23-6 is amended to ensure that policies, plans, and regulations promulgated by CRMC are enforceable by DCR, and includes language to empower DCR to exercise powers vested in CRMC. R.I.G.L. § 46-23-6(2)(i) is amended specifically to clarify powers of DCR in relation to the Department of Environmental Management (DEM) with new language.



OFFICE OF MANAGEMENT & BUDGET

State Budget Office

One Capitol Hill
Providence, RI 02908-5890

Office: (401) 222-6300
Fax: (401) 222-6410

State Fiscal Note for Bill Number:

2024-H 8148

R.I.G.L. § 46-23-20.1 is amended to reduce the number of required hearing officers from two to one, but allows the Governor to appoint additional hearing officers as they see fit. Should a hearing officer not be appointed within sixty days of the effective date, the Director is empowered to hire one or more, depending on availability. Other parts of existing statute are changed to reflect the changes to the hearing officer section.

R.I.G.L. § 46-23-27 is a severability provision, and R.I.G.L. § 46-23-28 sets the effective dates. Per the new language, within 30 business days of passage, DCR shall put out for notice and public comment revisions of the programs to implement the conversion (also known as the “red book”). Within seven days of promulgation of the revised program, DCR shall submit program change requests to the National Oceanic and Atmospheric Administration (NOAA) for approval.

R.I.G.L. §§ 46-23-2.1, 46-23-3, 46-23-5, 46-23-6.3, and 46-23-12 all reference the membership of the Council, and are fully repealed.

The conversion from CRMC to DCR would take effect upon passage of the bill.

Summary of Facts and Assumptions:

The Budget Office consulted with CRMC in preparing the range of estimates in this fiscal note. Conversion from the current Council structure to a Department structure implies some level of service enhancement, but there is significant policy discretion as to the appropriate extent of such enhancements. For this reason, this fiscal note provides the estimate of fiscal impacts as a range. At the low end, the range considers only those strictly necessary costs incurred as a result of the conversion of certain volunteer and pro bono functions of the Council to a staff-managed Departmental function. At the high end, this fiscal note includes certain enhancements identified by current CRMC management to more effectively fulfill the statutory mandates of proposed Department under its proposed new governance model. Certain costs, such as enhanced capital and facility needs, are discussed below, but remain outside the scope of this fiscal note. While the addition of staff to CRMC may necessitate capital investments, in the near term, the Budget Office recommends feasibility study or other review to gather requirements and develop more rigorous cost estimates.

This fiscal note considers numerous factors implicated in a departmental conversion. The largest consideration is staffing, with capital externalities following. In addition, such a conversion will necessarily have a major impact on agency operations, the greatest of which are included below.

Where applicable, “Council” will be used for the council itself, while “CRMC” will be used for the agency.

The Council provides CRMC with professional advice on policy and programs, resolves disputes, and is active in managing the legal implications of CRMC’s work. This bill would abolish the Council, thus requiring CRMC to insource those responsibilities to professional staff at the proposed DCR. The major areas in which the Council and CRMC function at this time follow:



OFFICE OF MANAGEMENT & BUDGET

State Budget Office

One Capitol Hill
 Providence, RI 02908-5890

Office: (401) 222-6300
 Fax: (401) 222-6410

State Fiscal Note for Bill Number:

2024-H 8148

1. Rights of Way (ROW): This function is currently undertaken by a subcommittee of the Council. ROW concern land use and agreements between the State, municipalities, and private property owners. This subcommittee performs a great deal of legal work, and so in order to perform these functions DCR would need legal and policy staff as well as administrative staff.
2. Planning and Procedures (P&P): This function is also undertaken by a subcommittee of the Council. This subcommittee primarily works with policy and regulations, programs, federal compliance, and operating procedures. DCR would need legal and policy staff to perform this work as well.
3. Contested Case Management (CCM): In the case of substantive objections to an action by CRMC/the Council, the agency hearing officer handles the case. The hearing officer currently has no support staff and relies on the Council for some of these needs.
4. Enforcement: CRMC is responsible for overseeing enforcement of rules and regulations associated with the coastline. Typically, this is performed reactively, as CRMC only has 2.0 FTE as enforcement staff, and the agency struggles with caseload.
5. Fiscal and Administrative Duties: CRMC’s professional staff are responsible for processing permits and other administrative tasks such as record keeping, as well as collecting fees/fines and bookkeeping.

Staffing Needs

CRMC estimates a need for the following new positions (15.0 FTE, total FTE authorization 47.0) to perform work currently undertaken by the Council and contracted legal staff, to be budgeted at the included amounts in salary and benefits estimated by the Budget Office:

- 4.0 Staff Attorneys (Job Class: SENIOR LEGAL COUNSEL, S&B \$177,414)
- 1.0 Hearing Officer (Job Class: CHIEF HEARING OFFICER, S&B \$228,106)
- 3.0 Policy Analysts (Job Class: COASTAL POLICY ANALYST, S&B \$128,080)
- 2.0 Enforcement Staff (Job Class: ENVIRONMENTAL SCIENTIST II, S&B \$148,778)
- 3.0 Clerks/Admins (Job Class: INFORMATION AIDE, S&B \$84,091)
- 2.0 Fiscal Staff (Job Class: FISCAL MANAGEMENT OFFICER, S&B \$117,121)

All inclusive, CRMC’s request to convert the agency to DCR and meet current operational needs for staffing is \$2,106,073. For the purposes of this note, 25 percent turnover is assumed in FY 2025, as it will take several months for DCR to hire personnel. This results in a total of \$1,579,555.



OFFICE OF MANAGEMENT & BUDGET

State Budget Office

One Capitol Hill
Providence, RI 02908-5890

Office: (401) 222-6300
Fax: (401) 222-6410

State Fiscal Note for Bill Number:

2024-H 8148

The Budget Office anticipates a minimum need for department conversion of the following 7.0 FTE, to result in a total FTE authorization of 39.0 FTE:

- 2.0 Staff Attorneys (Job Class: SENIOR LEGAL COUNSEL, S&B \$177,414)
- 1.0 Hearing Officer (Job Class: CHIEF HEARING OFFICER, S&B \$228,106)
- 2.0 Policy Analysts (Job Class: COASTAL POLICY ANALYST, S&B \$128,080)
- 2.0 Clerks/Admins (Job Class: INFORMATION AIDE, S&B \$84,091)

The total amount of this estimate is \$1,007,276. It should be noted that this amount reflects insourcing duties as they currently exist and does not reflect CRMC's projected operational need. Consulted on this bill, CRMC emphasized that current resources do not provide them the capacity to meet operational need as currently mandated, and that the department conversion may provide an opportunity to bolster existing resources to better perform duties as outlined in both existing statute and the proposed bill.

Assuming all legal duties are insourced, savings of \$0.2 million would be realized from cancellation of existing legal service contracts. This amount has proved to be insufficient as-is, and much legal work is completed pro-bono.

Staffing Externalities

CRMC currently occupies offices in the Stedman Building in South Kingstown. Additional staff above the current occupants would require additional space. The average commercial lease cost in the Providence, Rhode Island metropolitan area is \$30.88 per square foot, and the average purchase price is \$117.95 per square foot. The North American average of office space per employee is 150 square feet. This creates potential lease costs of approximately \$218,550 per year under the maximum proposal and \$181,350 at minimum. Purchase cost for office space (not to be construed as a purchase of an entire office building or complex) could be estimated at \$831,900 for a new office at the upper bound and \$690,300 at the lower end. It should be noted that, should purchase be chosen, the investment would be made up-front and would not recur.

Information technology and office supply costs would also increase at the margins, at a rate of \$2,345 per employee. Under CRMC's described need, this equates to a budgetary increase of \$35,174 relative to the FY 2024 Enacted Budget, and an increase of \$16,415 at minimum.

Capital Needs

While the addition of staff and enhancement of service may necessitate investments in facilities and equipment, a detailed estimate of such costs is outside the scope of this fiscal note. The Budget Office recommends feasibility study or other review to gather requirements and develop more rigorous cost estimates.

The agency expressed several needs for potential office space. Conference rooms are a necessity for hearings on ROW and conflicted cases, and sufficient parking will be required. Should a new office be



OFFICE OF MANAGEMENT & BUDGET

State Budget Office

One Capitol Hill
Providence, RI 02908-5890

Office: (401) 222-6300
Fax: (401) 222-6410

State Fiscal Note for Bill Number:

2024-H 8148

occupied by DCR, additional garaging space will be required for vehicles currently utilized by the agency. The Budget Office estimates a need for \$150,000 to conduct a feasibility study for garaging space and office space under the potentiality that DCR moves offices.

Comments on Sources of Funds:

CRMC's budget is currently primarily split between general revenue and federal funds. In the FY 2024 Enacted budget, CRMC received \$3.4 million in general revenue, \$2.3 million in federal funds, and \$0.3 million in restricted receipts. The FY 2025 Governor's Recommended budget includes \$3.6 million in general revenue, \$2.3 million in federal funds, and \$0.3 million in restricted receipts. The agency has received some Rhode Island Capital Plan (RICAP) funding in the past, and also holds bond proceeds used for dredging projects.

Summary of Fiscal Impact:

Minimum fiscal impact in FY 2025 would be approximately \$1.2 million and 7.0 FTE, bringing their total FTE count to 39.0. This lower estimate is based on the assumption that the agency will maintain current service levels and hire the minimum number of staff required to sustain existing capacity while adapting to the new organizational structure. For example, functions currently satisfied by volunteer council members and pro-bono counsel are replaced with administrative and legal staff.

(\$1,007,276 [7.0 FTE Personnel] - \$200,000 [legal contracts] + \$181,350 [lease] + \$16,415 [IT] + \$150,000 [feasibility study])

Maximum fiscal impact in FY 2025 is approximately \$2.9 million and 15.0 FTE, bringing their total FTE count to 47.0. This upper-bound estimate takes into account that the proposed department will need certain capacity enhancements to meet new service requirements as well as current duties. The maximum estimate reflects the agency's request for additional resources necessary to fulfill the legislative requirements in statute and associated with establishing the proposed department.

(\$1,579,555 [15.0 FTE Personnel, 25% turnover] - \$200,000 [legal contracts] + \$831,900 [office purchase] + \$35,174 [IT] + \$150,000 [feasibility study])

Fiscal impact in FY 2026 at the minimum end of the range is estimated to be approximately \$1.0 million, with all expenditures recurring except for the feasibility study. Expenditures in the maximum range would be approximately \$2.1 million per year in FY 2026, assuming all positions are staffed for the entirety of FY 2026.

Appendix G:
Acronym and Initialism
Dictionary

Acronym and Initialism Dictionary

Listed in alphabetical order.

CFR	Code of Federal Regulations
CRMC	Coastal Resources Management Council
CZMA	Coastal Zone Management Act (of 1972)
CZMP	Coastal Zone Management Program
DCR	Department of Coastal Resources
DEM	Department of Environmental Management
DOA	Department of Administration
EA	Environmental Assessment
EC4	Executive Climate Change Coordinating Council
EEA	Massachusetts Executive Office of Environmental Affairs
EIS	Environmental Impact Statement
EPA	Environmental Protection Agency
FDA	Food and Drug Administration
FTE	Full-Time Equivalent
FY	Fiscal Year
GIS	Geographic Information System
IFPTE	International Federation of Professional and Technical Engineers
MOU	Memorandum of Understanding
NBNERR	Narragansett Bay National Estuary Research Reserve
NEPA	National Environmental Policy Act
NOAA	National Oceanic and Atmospheric Administration
NSSP	National Shellfish Sanitation Program
OMB	Office of Management and Budget
RICAP	Rhode Island Capital Plan (Fund)
RICR	Rhode Island Code of Regulations
RICRMP	Rhode Island Coastal Resources Management Program
RIGL	Rhode Island General Law
RIMFC	Rhode Island Marine Fisheries Council
SAMP	Special Area Management Plan