

February 7, 2024

Elizabeth Stone, Rachel Calabro
Office of the Director
RI Department of Environmental Management (RI DEM)
235 Promenade Street
Providence, RI 02908

RE: Priority Climate Actions and Development of the 2025 Climate Strategy

Dear Elizabeth and Rachel,

Thank you for driving the RI Department of Environmental Management (RI DEM)'s ongoing planning and leadership in the development of the 2025 Climate Action Strategy and the EPA's Climate Pollution Reduction Grant (CPRG) application. While Acadia Center welcomes the opportunity to uplift priority projects, we would also like to emphasize the broader need for focused and coordinated implementation by the state to reduce greenhouse gas (GHG) emissions. Many of the priority short-term actions identified in the 2022 update will simply be restated in this and future processes, if there continues to be a lack of explicit lead actors, funding, and accountability by the agencies of the Executive Climate Change Coordinating Council (EC4) and the McKee Administration. For example, the high-level analysis conducted in 2022 by RMI and Acadia Center highlighted that electrifying the transportation sector and installing efficient electric appliances for space and water heating (e.g. heat pumps) combined have the most significant impact on GHG reductions in RI between 2020 and 2030. These priorities remain true now in 2024 and are expected to persist.

Priority Projects

- 1) Transportation Sector: reduce vehicle-miles traveled (VMTs) including through vital investments in a robust public transit system.
 - (a) Adequately fund RIPTA
 - (b) Fund and implement the Transit Master Plan and Bicycle Mobility Plan
 - (c) Electrify RIPTA and train service (MBTA/Amtrak) in Rhode Island
 - (d) Expand incentives for electric vehicles, electric bicycles, and charging infrastructure
 - (e) Require consideration of emission reduction potential in Statewide Transportation Improvement Program (STIP) allocations
- 2) Electric Power Sector: increase our green electricity supply and bolster distributed energy resources.
 - (a) Rapidly expand wind, solar, other renewables, and energy storage
 - (b) Advocate for expanded transmission line capacity and grid-enhancing technologies
 - (c) Pursue a flexible, dynamic distribution grid which better harnesses the abundant new flexibility provided by distributed energy resources (DER)

- 3) Buildings Sector: reduce energy consumption, and electrify existing and new buildings by converting from combustion technologies (boilers and furnaces) to efficient, electric technologies like air- and ground-source heat pumps, heat pump water heaters, and thermal energy networks.
 - (a) Invest in all cost-effective energy efficiency and address barriers to energy efficiency i.e. pre-weatherization barriers
 - (b) Require benchmarking and building performance standards for existing buildings
 - (c) Ensure new construction is fossil fuel free
 - (d) Pursue networked geothermal
 - (e) Expand incentives for heat pumps, and include low-income and gas customers
 - (f) Create a Clean Heat Standard

Sector-Specific Targets and Emissions Analysis

The 2016 Greenhouse Gas Emission Reduction Plan was intended to be used as a high-level reference for policymakers¹; the 2022 Climate Update provided an interim path forward for greenhouse gas mitigation pathways². Neither was intended to be a detailed implementation guide or work plan. This critical work has been continually deferred to the development of the 2025 Climate Strategy: “the details, modeling, and balancing of these [climate] actions across the sectors of our economy will be done as part of the 2025 Climate Strategy”³. Acadia Center urges RI DEM and the EC4 to engage a wide array of stakeholders and modeling experts to develop a detailed implementation guide/work plans by sector which will provide a path forward to achieving the state’s emissions reduction mandates by 2030, 2040, and 2050.

Sector-specific working groups may be the best approach to developing sector-specific workplans and targets throughout 2024. Detailed program and implementation discussions are the core of the 2025 Climate Strategy and must engage a variety of stakeholders. Each sector needs to take responsibility for reducing its own emissions dramatically. We urge RI DEM and the EC4 to establish sector-specific emissions reduction targets for 2030, 2040 and 2050. Without sector-specific targets, agencies and other actors may place disproportionate weight on the overperformance of other sectors for achieving net-zero mandates i.e. the Department of Transportation pointing to the heating sector and the Future of Gas docket pointing to the transportation sector. To date, there has been an absence of appropriate modeling and analysis for how actions and investments will reduce GHG emissions. To properly develop the 2025 Climate Strategy over the coming year, Rhode Island needs to analyze the technical feasibility of mitigation pathways toward GHG targets and the projected emissions reductions in relation to actions/implementation.

Environmental Justice Advisory Board

Finally, Acadia Center stresses the importance of centering those communities and individuals most impacted by the climate crisis in the development of the 2025 Climate Action Strategy and the EPA’s Climate Pollution Reduction Grant (CPRG) application. A commitment and accountability to Justice 40 is needed across agencies of the EC4 and across federal and state investments. Additional accountability for ensuring that the benefits of climate projects flow

¹ RI Executive Climate Change Coordinating Council (EC4), “Rhode Island Greenhouse Gas Emissions Reduction Plan,” December 2016: page 5.

² RI Executive Climate Change Coordinating Council (EC4), “Rhode Island 2022 Climate Update,” December 2022: page 2.

³ RI Executive Climate Change Coordinating Council (EC4), “Rhode Island 2022 Climate Update,” December 2022: page 5.

to disadvantaged communities can be achieved via a compensated Environmental Justice Advisory Board (EJAB). The EJAB would advise the EC4 on climate change efforts with respect to potential impacts on, benefits to, and special considerations for disadvantaged individuals and communities. We hope that efforts to convene such an advisory board can be expedited to contribute to the development of the 2025 Climate Strategy throughout 2024.

Thank you once more for your work in this area and for your consideration of these recommendations. I look forward to the opportunity to support the development of detailed, sector-specific workplans and targets to provide a path forward to achieving the state's emissions reduction mandates by 2030, 2040, and 2050.

Sincerely,

Emily Koo

Senior Policy Advocate & Rhode Island Program Director

ekoo@acadiacenter.org