# I-1: Lindsey Nolan

#### Comment I-1-1

Hello,

Topics/issues I'd like to see included in the plan include:

- Water conservation with the increased drought periods we're enduring
- Increasing our wildfire prevention and preparedness across the state. After the Exeter fire this spring, it's clear we need to be more focused on this through controlled burns and trainings.
- Reducing contamination from pesticides, etc. and plastics. The sheer amount of chemicals being dumped into yards is staggering. The plastic waste is also unacceptable ex: nip bottles.
- Promote and incentivize regenerative farming across the state. This practice is proven to rebuild our agriculture.
- Increase pollinators through gardens. Their critical habitats are quickly being destroyed. Expollinator highway gardens like North Carolina.
- Renewable energy by investing into more clean solutions and eliminating fossil fuels.
- Educating the public on how the climate impacts all of us and will require everyone to try repairing it.
- Compost bins like other states that offer this like a recycling bin. This tackles the massive amount of food waste and helps fertilize lands. It's so silly easy, I don't understand why this isn't being done.
- Ocean cleanup
- Preserving local wildlife and lands through conservation vs. more stores and consumerism.

I would love to be involved in this project if you are looking for additional help. I have been in the marketing communications and program management industry for the past decade and am looking to transition my career into climate change.

Lindsey

# I-2: Kenneth Payne

## Comment I-2-1

There's an old adage, "learn by doing" --which should inform the preparation of the 2025 plan. Implementing the 2021 Update, its "priority actions", specifically, should be foundational in developing the 2025 Plan. Rhode Island almost seems stuck in endless planning exercises. We should be thinking of "planning" in a "planning, programing, budgeting, executing" continuum. Since we're working in a complex adaptive system, we should consider "adaptive management" as the means of of overseeing implementation.

# **I-3: Robin Cooney**

#### Comment I-3-1

Gas Powered leaf blowers! Please ban them. The emissions from them are dangerously high and the company that works in East Greenwich uses two and sometimes three at a time. I contacted my state rep about this and she never responded.

Between the noise level & emissions it's hard to breath or think! Last week these leaf blowers ran two houses down from me for 6 hours! They throw more pollutants than a car.

## I-4: Donna Stein

#### Comment I-4-1

interest in RFI

# I-5: Roy Anderton

#### Comment I-5-1

credit for keeping forested land should be offered as a property tax credit

#### I-6: John Bandoni

#### Comment I-6-1

Would like to help to do the right things regarding the environment.

#### I-7: Andrew Neil

#### Comment I-7-1

- 1. In person meetings or workshops are great, but challenging to attend for many. I would recommend a combination of in person workshops and on-line (zoom) listening sessions. In person workshops should be held at different locations throughout the state to accommodate stakeholders (Brown, URI, Roger Williams, Bryant).
- 2. This must be a proactive blitzing to get the word out and keep organizations engaged throughout the process.
- 3. Workshops should be led by a 3rd party consultant with experience in leading charrettes, workshops, or public meetings.
- 6. Finding hyper-local organizations and people to spread the word in their networks.

- 7. Using a software system like ArcGIS Hub would be a great way to have an open web map where the public can input their feedback. This is easy to access and can be anonymous. https://www.esri.com/en-us/arcgis/products/arcgis-hub/overview
- 8. For most people graphics will be the most easily digestible. Bar graphs broken out by scope, with trend lines, and trajectories for "business as usual" and scenario planning to reach the goals.
- 11. It could be interesting to show the unknown Scope 3 emissions from goods and services for example.
- 12. A natural resources analysis would be interesting. For example, loss of forest lands to solar production?, cleaner air through vehicle emission reduction?, aquatic impacts from offshore wind? improved green spaces through tree equity?
- 16. I would recommend 2 versions of the final report. The full version provided for EPA compliance and a "public friendly" version that communicates the science and technical aspects in a more digestible way. The Metcalf Institute at URI could help with this.
- 17. Some type of web story would be a great way to share this report. For instance ArcGIS Story Maps.
- 18. A thorough analysis of how the Inflation Reduction Act or other federal programs could help RI on its path to decarbonization.

## I-8: Justine Johnson

#### Comment I-8-1

While I approve of any efforts to contribute to the reduction of fossil fuel consumption, the strategy for permitting solar fields needs to be logical and intentional. The rapid destruction of forested land all along the 95 corridor, as well as hidden in areas of West Greenwich and other areas should not have been allowed without a strategic plan. Solar carports, solar roof installations on industrial and commercial flat roofs, solar fields on capped landfills. These are all ways to utilize gray space. Trees clean the air, make oxygen, absorb carbon - cutting down thousands of acres of trees to put in solar is counterproductive and is sacrificing some of what makes Rhode Island so beautiful. The plan should focus on mandating better use of gray space through construction mandates, tax benefits to companies offering their parking lots and roofs to solar, etc. Please stop the massive destruction of our forests.

# I-9: Joseph Barletta

## Comment I-9-1

I just wanna get involved as much as I can

## I-10: Abby Benson

#### Comment I-10-1

Please add me to this. Thank you.

#### I-11: Peter Trafton

#### Comment I-11-1

I reply to General Question

18. Is there anything missing from the outline of tasks that you wish to see added to the scope of work?

My comments are attached as a pdf. along with 2 supporting documents. Thanks for your work and your commitment to furthering RI's response to climate change!

# I-12: Timothy Riker

#### Comment I-12-1

Response to Request for Information: Inclusion of the Deaf, DeafBlind, DeafDisabled, Hard of Hearing, and Late Deafened Community in the State's Climate Action Strategy

Thank you for providing this opportunity to contribute to the development of Rhode Island's 2025 Climate Action Strategy. It is crucial to ensure the inclusion and active participation of the Deaf, DeafBlind, DeafDisabled, Hard of Hearing, and Late Deafened community in this important process. Encouraging collaboration with the Rhode Island Commission on the Deaf and Hard of Hearing's Emergency and Public Communications Access Program (EPCAP) will be instrumental in achieving meaningful engagement with this community. Below are the responses to each task identified in the outline:

## Task 1: Public Engagement

1. What forms of public outreach and engagement should be conducted?

Public outreach and engagement should include a diverse range of methods to ensure broad participation. This can include town hall meetings, workshops, focus groups, surveys, online platforms, and targeted outreach to underrepresented communities. It is important to provide multiple channels and formats for engagement to accommodate different communication preferences and accessibility needs.

2. How can we best support community organizations to engage in or help lead these processes?

Support for community organizations should be provided through capacity-building efforts, training programs, and direct collaboration. These organizations can play a crucial role in mobilizing their communities and ensuring their voices are heard. Collaborative partnerships through the Rhode Island Commission on the Deaf and Hard of Hearing can be established to co-design engagement processes, provide resources, and share expertise.

3. What areas of public engagement and outreach should be led by the state, by the community, by the consultant, or in which areas would you recommend collaboration for optimal results?

Collaboration between the state, community, and consultant is recommended for optimal results. Each entity brings unique perspectives and expertise that, when combined, can lead to a comprehensive and inclusive engagement process. The state should take the lead in providing guidance, resources, and establishing the overall framework, while community organizations and the consultant can contribute by implementing specific engagement initiatives and ensuring community representation.

4. Which groups should be included, and do you have suggestions for how to include them?

To ensure inclusion, the State should actively engage with community organizations representing diverse populations, including the Deaf, DeafBlind, DeafDisabled, Hard of Hearing, and Late Deafened communities. Working closely with the Rhode Island Commission on the Deaf and Hard of Hearing, particularly through their Emergency and Public Communications Access Program (EPCAP), will be instrumental in facilitating their meaningful participation. Establishing channels for direct communication, such as meetings, focus groups, and surveys, can help gather input and address the specific needs and perspectives of these communities.

5. What did you like about the stakeholder engagement process for the 2022 Update, or any other public engagement process? What would you like to see improved, and how?

Feedback from stakeholders regarding the 2022 Update stakeholder engagement process should be reviewed to identify areas for improvement. Incorporate suggestions to enhance transparency, accessibility, and effectiveness of the public engagement process. It is important to ensure clear communication, timely feedback loops, and the provision of accessible materials and resources.

6. How can we ensure that our public engagement process is inclusive and accessible to all?

Inclusivity can be ensured by providing multilingual materials, offering American Sign Language interpretation, captioning and transcription services, and utilizing accessible online platforms. Collaboration with community organizations representing underrepresented groups is crucial for effective engagement. It is essential to consider diverse communication preferences, provide alternative formats, and actively seek input from individuals with disabilities and those with limited English proficiency.

7. What public engagement methods would you recommend to elevate the voices, perspectives, and needs of low-income and disadvantaged communities?

To elevate the voices, perspectives, and needs of low-income and disadvantaged communities, targeted outreach efforts should be implemented. This can include conducting community-specific meetings and workshops, organizing focus groups, and actively seeking input through trusted community organizations and leaders. Engaging with local grassroots organizations and leveraging existing networks can facilitate meaningful participation from these communities.

## Task 2: Scenario Building and Projections

8. What type of climate/emissions reductions modeling would you like to see conducted for the 2025 Climate Action Strategy?

The climate/emissions reductions modeling should encompass a comprehensive analysis of various mitigation strategies and their potential impacts. It should consider both economy-wide and sector-specific scenarios to understand the feasibility and effectiveness of different policies and actions. The modeling should also incorporate the potential impacts on different communities and provide a basis for evaluating equity considerations.

9. What do you think was missing from the modeling included in the 2022 Update?

Feedback regarding the missing elements from the modeling included in the 2022 Update should be reviewed to address any gaps. Consider incorporating a broader range of factors such as health co-benefits, social equity implications, and the specific needs and perspectives of the Deaf, DeafBlind, DeafDisabled, Hard of Hearing, and Late Deafened community.

10. Do you have any models or modeling approaches that you recommend and why?

Consultation with experts in climate modeling and incorporating established modeling approaches is recommended. Models like Integrated Assessment Models (IAMs) or other recognized frameworks can provide a holistic understanding of the potential outcomes of different policy scenarios. It is important to ensure that the selected models are scientifically robust, inclusive, and consider the unique aspects of Rhode Island's context.

11. What other modeling factors and considerations should be considered for the 2025 Climate Action Strategy?

Other modeling factors to consider include the potential co-benefits and trade-offs of specific mitigation actions, the interdependencies between sectors, the influence of technological advancements, and the economic implications at both the state and local levels. Additionally, specific considerations should be given to assess the impacts and benefits of climate action on the Deaf, DeafBlind, DeafDisabled, Hard of Hearing, and Late Deafened community. Access to

accurate and reliable communications can prevent misinformation and ensure that climate action is taken effectively and in a timely manner.

Task 3: Analyses

Do you have any suggestions or considerations for any of the five analyses listed above?

12. For the benefits analysis, low-income and disadvantaged communities analysis, workforce planning analysis, macroeconomic analysis, and policy analysis, it is crucial to include a focus on the impacts and needs of the Deaf, DeafBlind, DeafDisabled, Hard of Hearing, and Late Deafened community. By consulting with relevant organizations and individuals, their unique perspectives can be incorporated to ensure the analyses are inclusive and address the specific challenges faced by these communities.

The benefits analysis will include an examination of co-pollutants (including NOx, SO2, PM2.5, VOCs, air toxics). What other types of benefits would you like to see included in this analysis?

13. In addition to co-pollutants, the benefits analysis should consider other factors such as improved air quality, public health outcomes, reduction in healthcare costs, job creation, economic development, and social equity benefits. It is important to recognize the holistic advantages of greenhouse gas reduction measures beyond emissions reduction alone. The benefits of accessible and effective public communications in promoting climate action that leads to reductions in emissions and environmental harm should also be analyzed.

Would you like to see any additional analyses conducted, and if so, why?

14, Consider conducting additional analyses focused on specific topics, such as climate justice and the unique challenges faced by the Deaf, DeafBlind, DeafDisabled, Hard of Hearing, and Late Deafened community. These additional analyses can provide valuable insights into addressing the specific needs and ensuring equitable outcomes for these communities.

Are there any specific stakeholder groups you would like to see engaged in any of the analyses?

15. To ensure a comprehensive and inclusive analysis, it is important to engage with a diverse range of stakeholders. Specifically, involving representatives from the Deaf, DeafBlind, DeafDisabled, Hard of Hearing, and Late Deafened communities, environmental justice organizations, community-based organizations, academia, public health experts, and businesses will provide valuable perspectives and insights.

Task 4: Preparation of the Final Report

16. Do you have any suggestions for how to best design and craft the 2025 Climate Action Strategy's final report?

The final report should be accessible, comprehensive, and transparent. It should clearly outline the key findings, strategies, and actions proposed in the 2025 Climate Action Strategy. Visual aids, infographics, and plain language summaries can be included to enhance understanding. Additionally, the report should highlight the importance of collaboration, public input, and emphasize the inclusion of the Deaf, DeafBlind, DeafDisabled, Hard of Hearing, and Late Deafened community throughout the strategy.

17. How would you like to see the results of the 2025 Climate Action Strategy shared with the public and various groups, beyond just the release of the final report?

The results of the 2025 Climate Action Strategy should be disseminated widely to ensure broad public awareness and understanding. Utilize various channels such as public forums, community presentations, webinars, social media, and the Rhode Island Commission on the Deaf and Hard of Hearing's platforms to reach diverse audiences. Develop targeted communication strategies to engage and involve the Deaf, DeafBlind, DeafDisabled, Hard of Hearing, and Late Deafened community, ensuring accessibility and inclusivity in all communications.

#### **General Question**

18. Is there anything missing from the outline of tasks that you wish to see added to the scope of work?

Considering the inclusion of the Deaf, DeafBlind, DeafDisabled, Hard of Hearing, and Late Deafened communities, it is important to add a task specifically focused on accessibility and accommodations. This task should ensure that all public engagement processes, communication materials, and final reports are accessible to individuals with hearing-related disabilities, employing appropriate accommodations such as American Sign Language interpretation, closed captions, and accessible document formats. Collaborating with the Rhode Island Commission on the Deaf and Hard of Hearing's Emergency and Public Communications Access Program (EPCAP) can provide valuable guidance and expertise in this regard.

# Or-1: RICOSH (James Celenza)

#### **Comment Or-1-1**

reference to reduce GHG in transportation sector:--

Minnesota passed ambitious climate goals in 2007, as many states were doing during that era. But as with other states, Minnesota had a difficult time following through with concrete actions to meet those goals.

Minnesota prepared and executed an extensive legislative agenda that included a law to move Minnesota to 100 percent clean energy by 2040. That bill, including a new transportation funding agreement passed last week the new law passed by the Minnesota legislature provides: 

The authority for Metro Transit to deploy non-police personnel to check fares and issue administrative citations.

- 2 \$195 million to design and build the Northern Lights Express, a new passenger rail route that will operate between the Twin Cities and Duluth.
- 2 \$150 million to erase a transit funding deficit in the Twin Cities region.
- ② \$300 million annually to build out and improve the Twin Cities region's Bus Rapid Transit (BRT) system.
- 2 Means-tested tax credits for up to 75 percent of the cost on an electric-assisted bicycle.
- 2 \$2 million for a pilot program to connect people experiencing homelessness or mental health and addiction issues to social services.

These provisions are funded by:

- ② Increasing Minnesota's gas tax by 5 cents/gallon by 2027 by indexing it to inflation. This provision will provide stable funding not only to transit and passenger rail, but the entirety of Minnesota's transportation system.
- Increasing the statewide sales tax by 0.25 percent to fund housing programs and projects.
- 2 Increasing the sales tax in the Twin Cities region by an additional 0.75 percent.
- Imposing a \$0.50 fee on deliveries over \$100 in value.

It also requires that the Minnesota Department of Transportation (MnDOT) assess proposed highway expansion projects for consistency with their established greenhouse gas reduction goals, specifically by reducing the VMT on Minnesota's roads. If MnDOT authorizes a project that increases VMT, they will need to offset the increased emissions by linking the project with a portfolio of other projects that reduce VMT by the same amount or more.

# Or-3: Center for EcoTechnology (Coryanne Mansell)

#### **Comment Or-3-1**

See Document Attachment

# **Or-4: Ecogy Energy (Twiggy Menenhall)**

#### **Comment Or-4-1**

Please accept the attached as Ecogy Energy's response with regard to the Request for Information To Support the Development of a Scope of Work for The 2025 Climate Action Strategy. We thank you in advance for your consideration of our comments and for continuing Rhode Island's leadership in creating the policies aimed at public policy goals, including encouraging optimally sited solar PV systems on rooftops, parking lots, and brownfields – projects closer to load.

(See document attachment)

# Or-5: Rhode Island Marine Archaeology Project (DK Abbass)

#### **Comment Or-5-1**

The Rhode Island Marine Archaeology Project (RIMAP) notes with interest that the Climate Change Coordinating Council has requested Information about things to think about in preparing their 2025 Climate Action Strategy.

With a 30-year history of ocean-centered scientific research and public outreach activities, RIMAP is a stakeholder on ocean matters as they relate to Rhode Island's submerged cultural heritage, a heritage that has local, national, and international significance. As such, RIMAP is also a stakeholder on climate matters because it is impossible to consider climate change without including the oceans. As the recognition grows that many climate solutions will include our oceans and ports, there is also a growing concern that such solutions will have unexpected and negative consequences for the submerged cultural resources that are an important part of Rhode Island's heritage.

RIMAP is accredited by UNESCO, and we support UNESCO's Decade of Ocean Science for Sustainable Development (2021-2030) and the Decade also includes cultural issues. Governor McKee named RIMAP an International Economic Ambassador because of the world-wide importance of our work. And RIMAP has created a cadre of Citizen Scientists who participate in our scientific research and who are also a constituent group to advocate for the protection of the submerged cultural heritage, not only in local waters, but in the world-wide ocean, too.

RIMAP supports the efforts of the EC4 to create a Climate Action Strategy, but it is troubling that there is no State Agency or other State Partner associated with the EC4 (as shown on the website at https://climatechange.ri.gov/state-actions/building-resilience) with a specific focus on how the Climate Action Strategy will affect our state's historical and cultural materials underwater, and especially how that Strategy will include policies related to the ocean that may have a negative impact on those fragile and irreplaceable cultural resources. It is clear that the proposed EC4 strategies to manage climate change and build climate resilience will necessarily include what happens in the ocean and local waters. As these proposals for Strategies are considered, RIMAP requests that the protection of the state's underwater cultural heritage be part of these discussions, especially as blue technology opportunities grow in our state and our submerged cultural heritage is increasingly threatened. We are not a state agency, but the Rhode Island Marine Archaeology Project stands ready to share its expertise and knowledge if such details might support the EC4 Strategy and enable its success.

## **Or-6: Rescuing Leftover Cuisine**

#### **Comment Or-6-1**

- 1. Expansive programing in promoting prevention and minimization of wasted food would play an integral role in the development of Rhode Island's 2025 Climate Action Strategy. By educating businesses about the importance and benefits of diverting food from landfills, Rescuing Leftover Cuisine and other organizations with aligned missions could partner with more local businesses and farms to redistribute their surplus food to local organizations, feeding people, not landfills.
- 2. Funding to support local organizations that divert food from landfills would significantly reduce Greenhouse gas emitted from wasted food in Rhode Island's Central Landfill (including but not limited to Rescuing Leftover Cuisine). Food Donation is an easy and sustainable solution towards supporting Climate Action by eliminating food loss, while also working towards 100% food security and supporting businesses in Rhode Island. Furthermore, investments in technology for RLC and others in this space would play a significant role in helping to make the food recovery movement more efficient & sustainable.
- 4. Rescuing Leftover Cuisine (RLC) aims to help make surplus food donation a common practice among Rhode Island businesses. By including Rescuing Leftover Cuisine (RLC), we would work with fellow organizations to divert food from landfills. RLC launched in Rhode Island in 2021, and has since rescued over 50,000 pounds of food from 21 businesses to over 40 local nonprofit organizations, thanks to over 170 community members that have volunteered as Rescuers (www.rescuingleftovercuisine.org/rhode-island). Additionally, RLC's technology allows our organization to track and analyze multiple streams of data to measure and evaluate progress in real-time, including: the number of donors; rescues; pounds of food rescued; meals provided; GHG emissions prevented; outreach performed; and volunteer statistics.

We also suggest organizations like MEANS Database, which RLC has partnered with for the EPA Healthy Communities Grant in 2021-2022 and 2022-2023. The reason for this suggestion is because we strategically and symbiotically work together by combining our areas of expertise and experience to further our impact.

10. Rescuing Leftover Cuisine addresses a niche gap in the food recovery space by crowdsourcing community members as both volunteer and paid Rescuers who use our purpose-built website application to easily redistribute surplus food from businesses to nearby nonprofits. This service model allows for complete flexibility to accept all types of food with no scheduling or size restrictions to reach more communities.

# B-1: The Brattle Group, Inc. (Dean Murphy)

#### Comment B-1-1

See attached document

# **B-2: Deloitte Consulting LLP (Ryan Fitzgerald)**

#### Comment B-2-1

- 1.0 Public Engagement
- 1. What forms of public outreach and engagement should be conducted?

A combination of participatory engagement practices (e.g. methods that engage impacted stakeholders like listening sessions, panels, workshops, focus groups, steering committees, etc.) and deliberative approaches (e.g. facilitated scenario planning, citizen advisory/working groups, public dialog using consensus-building strategies, community-driven planning, etc.) would enable EC4 to effectively engage the public. In our applications of HCD, we have found that credibility and buy-in result from enabling impacted stakeholders to influence all stages from providing meaningful input during the definition of the problem and design of a project, throughout implementation, operation and maintenance, and decommissioning. In addition, to foster public support throughout the entire execution of the Strategy, EC4 must effectively communicate its progress at regular intervals via ongoing outreach and public forums.

2. How can we best support community organizations to engage in or help lead these processes?

Rhode Island should consider a laddered approach to increasing engagement with communities and community-based organizations. The first rung of the framework, Inform, is a one-way information flow from the state government to local communities on the 2025 climate strategy planning processes to gain buy-in from communities through open houses, fact sheets, presentations, billboards, and more. As the state moves up the Ladder of Engagement, the communities assume a greater role in self-determination, from Consult where the community can provide input into the strategy planning processes, to Involve where community concerns are considered fully and reflected in planning, to Collaborate and Community Ownership, where the community assumes greater power as decision-makers for what gets included in the strategy and ultimately leaders and co-owners of climate projects, holding joint responsibility for securing benefits of the projects in their communities. Deloitte's Ladder of Community-Centered Stakeholder Engagement approach helps understand where on the ladder does the state, program or project team currently engage with each stakeholder group compared with the desired level of engagement, then helps construct strategies and tactics to transition between the current level of engagement to the desired level. EC4 can engage communities in

every step of the Strategy process, from planning to implementation to evaluation, de-risking the entire process by garnering trust, buy-in, and ownership from residents, thus mitigating community-based roadblocks later. Community organizations play an important role in facilitating this process with residents as well as in piloting programs and monitoring outcomes against the defined benefit metrics.

3. What areas of public engagement and outreach should be led by the state, by the community, by the consultant, or in which areas would you recommend collaboration for optimal results?

As described in our response to Question #2, we suggest a collaborative approach with communities and the broader public that starts with a flow of information and evolves to community ownership of components of the Strategy planning, implementation, and evaluation. While the state should play a role and be present in the engagement activities, EC4 would benefit from a third-party (consultant) organizing and facilitating public engagement efforts in close partnership with local community-based organizations. Thus, we recommend communities ultimately lead and own climate programs, community-based organizations (CBOs) support engagement processes with community members, a consultant designs, plans, and facilitates engagement with community members and organizations helping to build the capacity of the CBO to lead engagement activities over time, and the state government decides and approves on collaboration and engagement plans and methods and maintains involvement throughout.

4. Which groups should be included, and do you have suggestions for how to include them?

Given the complexities of designing and implementing a successful climate strategy, EC4 can view all stakeholder groups as an "ecosystem" where groups are interacting and dependent upon one another to be engaged for the full strategy to be successful. Groups that would benefit from being a part of this ecosystem are:

- Rhode Island based non-profits, charitable foundations, and community-based activists and organizations with long-standing relationships with their communities. These groups often serve as the voice of under-resourced populations and can provide guidance on ways to engage community members, advise how to best tailor solutions to their community, and support the community engagement processes described in the prior responses.
- Historically underserved and/or low-income and disadvantaged communities (LIDACs) who can be engaged for ownership of climate programming and to support addressing historic inequities in their communities as part of the Strategy implementation.
- Highly climate-impacted stakeholders, communities, and populations including those who experience coastal and inland flooding, those impacted by extreme heat like outdoor workers, those experiencing commercial fishing or agricultural loss, etc.
- Industry and business leaders who can inform plans to support climate goals, enable a just transition within impacted industries, regions, and workforce groups, and partner with the state via public-private partnership models to invest in and implement climate projects.

• Local scientific community who can provide expert climate-related knowledge, approaches, and innovations specific to the State and high-impact regions. It is particularly important to engage this community as part of the Strategy planning phase to provide evidence-based inputs on GHG emissions reduction measures.

EC4 should also consider the diversity and geographic representation of the ecosystem groups to enable a holistic representation of the state in the Strategy. Community-centered inclusion in climate planning also requires best practices such as: impacted communities being represented in decision-making bodies within the governance model, and being considered in transparency and accountability measures (i.e. the truthful communication of project burdens, project benefit evaluation, and enforcement of community agreements).

5. What did you like about the stakeholder engagement process for the 2022 Update, or any other public engagement process? What would you like b see improved, and how?

The 2022 Climate Update highlights the following Priority Action: "create space for meaningful conversation - continue climate justice conversations in communities and with a new climate justice advisory board". This is a key commitment to expanding the stakeholder engagement process to all voices; it can be improved upon by defining specific strategies that will be employed to do so, in addition to the community listening sessions and open meetings utilized today. Recommended strategies are covered in our responses to Questions #1, #2, and #7.

The Update also mentions engaging "business communities... to meet our greenhouse gas emissions reduction goals." The scope of this engagement should be expanded to develop and retain a skilled workforce that supports Rhode Island's climate future, and establish specific public-private partnerships for programs and projects to reduce emissions. This is also a unique opportunity for the state and cross-sector industry leaders to work together to capture as much value as possible from federal funding opportunities (e.g. CHIPS, IIJA, and IRA) that were unavailable in past years.

6. How can we ensure that our public engagement process is inclusive and accessible to all?

The State can use a wide array of methods to engage the public, but to advance inclusivity, we recommend identifying personas that reflect different segments of the public and targeting engagement strategies to each persona based on their stakeholder group characteristics, preferences and specific needs. Creating personas could lead to multiple types of engagement methods including creating of a variety of reading-level materials; basic vs. advanced science-based educational content; designing outreach, communication strategies, and materials for accessibility for all users including those with disabilities, and acting to ensure any groups that cannot be present at engagement events have access to an After-Action Report summarizing the discussion and advising on the proper forums to provide any further commentary. For example, on a project with a state government agency, we supported the client to design monthly forums for public engagement, sending personalized invites to different groups over the 6-month time period; to remove barriers to participation, transportation was coordinated

and subsidized, food and childcare were provided on location, and translators were accessible so that all voices could be truly heard.

7. What public engagement methods would you recommend to elevate the voices, perspectives, and needs of low income and disadvantaged communities?

A just and equitable climate strategy must engage people most vulnerable to climate impacts to create clean, healthy, climate resilient communities with opportunities for all. Often those experiencing the first and worst impacts of climate change are those least responsible for its causes and least able to access resources to adapt to its impacts. Therefore, people who live in LIDACs or identify in a disadvantaged population group require specific consideration. To increase participation and effectiveness, and truly co-create climate solutions and programming with LIDACs, we recommend the Ladder of Community-Centered Stakeholder Engagement described in our response to Question #2. LIDACs should have the opportunity to: provide input on the key elements of the Strategy, including the goals, objectives, projects, and targeted quantitative and qualitative benefits, and make decisions on what gets included in the Strategy; co-own the implementation of the Strategy's climate programs; and be kept up-to-date on all progress and periodically consulted to maintain a trusting relationship.

- 2.0 Scenario Building and Projections
- 8. What type of climate/emissions reductions modeling would you like to see conducted for the 2025 Climate Action Strategy?

A more granular accounting and analysis of emissions at the sector level (e.g., down to the level of specific power plants, industrial facilities, organizations/businesses, facilities/assets and other point sources) can inform a more accurate understanding of the state's emissions and their sources. The Strategy should consider implementing sub-annual netting of energy and emissions data in order to best identify and implement abatement strategies. While annual netting incurs a lower administrative burden and offers a high level data profile, building a standard of better data measurement is key to creating actionable climate action plans, identifying intervention opportunities, and mitigating emissions with renewable energy certificates (RECs), where appropriate. This, in turn, leads to more effective and targeted decarbonization.

9. What do you think was missing from the modeling included in the 2022 Update?

We understand that EC4 is planning for a separate climate impact/risk plan and strategy, however we recommend that climate risk modeling be conducted in conjunction with the GHG emissions modeling and projections, to identify geographical areas, communities, and critical infrastructure that could be subject to various climate hazards/risks across various time horizons. This kind of analysis can inform where decarbonization and resilience measures can be integrated, not just for infrastructure but also for preparations for community emergency management and response.

Additionally, modeling climate risks across critical assets will help augment abatement analysis. For example, if for the energy sector, integration of renewable energy projects (such as solar/wind, etc.) is the fastest and most immediate mechanism to decarbonize RI's grid, climate hazard modeling in relation to site planning for these projects should be factored into project plans.

10. Do you have any models, or modeling approaches that you recommend and why?

In addition to modeling emissions projections in the near and long term, we recommend EC4 also consider measuring and modeling emissions produced by the state government itself. Before governments can require industries to monitor and reduce carbon emissions, public agencies must demonstrate the willingness and ability to do the same. Rhode Island is a leader in this space, with Governor McKee signing Executive Order 23-06 just last month, updating the state's Lead by Example (LBE) policies to ensure state agencies prioritize emissions reductions in alignment with mandates set forth in the 2021 Act on Climate. In order to meet targets set forth in Rhode Island's LBE mandates, the state government should strongly consider updating its modeling approach to one that relies on hourly emissions rather than average annual emissions. Measuring emissions at this granular level provides the most relevant and actionable GHG emissions data, helping to inform targeted decarbonization actions and investments. This will allow state agencies to get the most detailed picture available of their carbon footprint by understanding building, fleet, and operational emissions within the context of purchased electricity and the carbon intensity of the grid.

In turn, state agencies will be equipped with the requisite data to make informed, dynamic decisions to drive decarbonization across assets - where and whether to install rooftop solar or on-site generation, when to charge the state's electric vehicle fleet, when to procure carbon-free energy and utilize renewable energy certificates, and which energy efficiency actions will garner the greatest cost and carbon reduction impact. Further, hourly carbon accounting will enable state agency stakeholders to consistently access accurate and timely energy use and emissions metrics, rather than waiting for year-end reports, and disclose progress to the public. Empowered with insights from this granular data, Rhode Island will be well-positioned for competitive financing, able to substantiate grant proposals, and ready to maximize federal funding benefits.

11. What other modeling factors and considerations should be considered for the 2025 Climate Action Strategy?

Given the important intersection between resilience and decarbonization, we recommend that EC4 consider resilience as part of its modeling factors and considerations, in alignment with the Resilient Rhody. Specifically, as the state starts to assess and design abatement projects, considering whether an abatement project also increases resilience, and by how much, could inform investment decisions.

## 3.0 Analyses

12. Do you have any suggestions or considerations for any of the five analyses listed above?

Rhode Island's EC4 will need to take a multidisciplinary approach to identify LIDACs and determine how decarbonization measures can be designed to both reduce statewide emissions and address historic inequities. To prepare for such analyses, some considerations include: creating a definition for disadvantaged communities and identifying them across the state (EC4 can consider leveraging the CEQ Climate & Economic Justice Screening Tool (CEJST) for this effort or developing a custom geospatial disadvantaged index leveraging Rhode Island data to better reflect residents' lived experience), collaborating with LIDACs to identify benefits and harms of decarbonization measures, and developing an evidence-based approach to track, measure, and report impacts over time.

To identify and analyze impacts to LIDACs, EC4 can leverage EPA's CPRG: Technical Reference Document for States, Municipalities and Air Pollution Control Agencies Benefits Analyses of LIDACs which provides recommendations for potential benefits to consider (we've outlined our recommended benefits for consideration in our response to Question #13). Once the potential benefits and disbenefits are identified, EC4 can apply modeling and scenario planning methods to estimate how (and by how much) the proposed decarbonization measures will benefit LIDACs (e.g., number of jobs created in LIDAC communities, or improved air quality due to lower emissions). This benefit analysis can then inform how the EC4 organizes programs and policies to maximize recognized benefits and mitigate potential harms. The EC4 should continue to engage community stakeholders as programs and policy decisions proceed to verify actionable strategies against LIDAC priorities. Recognized benefits also need to be measurable, so measurement of progress against those projected benefits is possible. Adopting a continuous improvement mindset, allowing for the comparison of projected benefits to those actually accrued by communities will guide continuous course correction as the Strategy progresses.

Further, to analyze and prepare the state's workforce to address climate change, EC4 can consider both the demand side, what is required of the work from a skills perspective and where the greatest gaps are; and the supply side, who is qualified, available, and interested in quality jobs today and in the future. With robust analyses of both the demand and supply side, EC4 can design a climate action strategy that mitigates climate change and supports quality job creation through attracting and retaining workers, skill development and credentialing, and fair compensation across the state. The State should understand the skills employers need now and in the future by incorporating future planning with Governor McKee's Learn365 RI educational priorities, which we view as an opportunity to build the right skilled workforce with K-12 education levels. It is also key to prioritize critical jobs across industries and build career pathways to those jobs as a pillar towards addressing climate change.

13. The benefits analysis will include an examination of co-pollutants (including, NOx, SO2, PM2.5, VOCs, air toxics). What other types of benefits would you like to see included in this analysis?

In addition to the co-pollutants listed above, EC4 might also consider economic benefits (e.g., total quality jobs created, quality jobs created in disadvantaged communities, reduced energy costs, decreased operation and maintenance costs, workforce development pipelines created, increased small business procurement, and increased access to capital for LIDAC projects); energy benefits (e.g., improved access to commercially ready clean energy technologies, the potential for local cooperative ownership of clean energy generation, and improved energy resilience); environmental benefits (e.g., improved outdoor air quality, reduced greenhouse gas emissions, improved indoor air quality, increased access to greenspace, and improved indoor occupant comfort), and health co-benefits (e.g., reduced respiratory illness due to poor environmental quality). These additional benefits, among others, can be realized with successful implementation of carbon reduction measures.

# 14. Would you like to see any additional analyses conducted, and if so, why?

We recommend including a climate risk analysis. A climate risk analysis would analyze Rhode Island's geography and infrastructure to identify any areas where resilience measures would need to be amplified to protect Rhode Island's communities against potential extreme climate events (e.g. coastal or inland flooding, extreme heat, etc.). Additionally, assessing the vulnerability of critical infrastructure, such as transportation networks and water management facilities, is crucial to ensuring their resilience in the face of extreme climate events. The analysis might also consider the socioeconomic factors associated with extreme climate events, addressing the impact on LIDACs those with and socioeconomic disparities. By understanding these risks, EC4 can develop targeted strategies and allocate resources effectively to enhance resilience and protect communities and the economy of Rhode Island, while reducing emissions.

Another suggested analysis includes evaluating funding opportunities, particularly the Infrastructure Investment and Jobs Act (IIJA) and the Inflation Reduction Act (IRA). This analysis may include cross walking the projects identified in the Strategy to federal funds, to ensure alignment between Rhode Island's climate goals and projects and the available funding. It would also allow for identification of strategic funding sources beyond the Strategy through exploration of the combination of federal and state funds for maximum leverage.

Additionally, Deloitte suggests an analysis of best practices on integrating public-private partnerships (PPPs) into the Strategy. Conducting a thorough analysis of such integration is crucial for several reasons. First, by engaging in PPPs, EC4 can leverage the expertise, resources, and innovation of both the public and private sectors, fostering collaborative solutions to address climate challenges more effectively. This approach enables shared responsibilities, allowing governments, businesses, and civil society to pool their efforts, knowledge, and funding for maximum impact. Second, an analysis of PPP integration would help identify potential risks and opportunities within the plan. It would allow EC4 to assess the compatibility of their goals, strategies, and values with prospective partners, ensuring alignment and reducing the likelihood of conflicts or inefficiencies. Furthermore, conducting this analysis

would enable evaluation of the legal, financial, and operational implications of various potential PPPs, including considerations of governance, accountability, and risk management. By undertaking a comprehensive assessment, EC4 would be primed to make informed decisions about the integration of PPPs into their Strategy, unlocking the potential for transformative and sustainable outcomes. The analysis would not only enhance the overall effectiveness of climate measures, but also foster collaboration, innovation, and resilience.

15. Are there any specific stakeholder groups you would like to see engaged in any of the analyses?

To inform the workforce analyses we recommend engaging with industry representatives and employers from Rhode Island's main industries, labor unions, trade associations, governmental workforce agencies, state and local workforce development boards, non-profit community groups engaged in employment, and educational institutions including universities, community colleges, and trade schools.

To inform the LIDAC benefits analyses we recommend engaging with local governments, community representatives, community-based organizations and other non-profits focused on LIDACs, faith-based organizations, community organizers and other community influencers, and businesses. LIDACs themselves know best the barriers they face and can identify and down-select solutions that can address those challenges. Non-profit organizations who work in disadvantaged communities can provide valuable insights into the needs of these communities, while government agencies often have data and resources that can be used to define disadvantaged communities. Community engagement provides valuable insights and qualitative data on lived experience to ground truth state and federal quantitative data sets. Lastly, businesses can play a role in supporting disadvantaged communities by providing on-ramps to quality jobs especially to support underrepresented populations, investing in local businesses, and supporting community development initiatives, and thus should be engaged from the start of the process. By engaging with employers through the workforce planning analysis, Rhode Island should look to develop public-private partnerships or workgroups that help them play an active role in key decisions and collectively address climate change.

By engaging a variety of stakeholders in both of the analyses outlined above, a variety of benefits will emerge. These include: improved decision-making, increased trust and buy-in, and improved communication. When stakeholders are involved in the analysis process and their voices are able to influence the design and implementation of the Strategy, they are more likely to buy into the recommendations that are made. By involving stakeholders in the analysis, EC4 can improve communication between different groups and build trust and collaboration, which are essential for successful planning and program implementation.

## 4.0 Preparation of the Final Report

16. Do you have any suggestions for how to best design and craft the 2025 Climate Action Strategy's final report?

Given the EPA's CPRG requirements, we would recommend that the 2025 Strategy is in compliance with the comprehensive climate action plan requirements (and not just the priority climate action plan) so that EC4 only has to go through the effort of developing and publishing a plan, and garnering buy-in once. Including an evaluation of how the Strategy implementation will deliver co-pollutant emissions reductions and other benefits to LIDACs and specific projects and activities that the state can execute to achieve the Strategy's goals, objectives, and outcomes would be beneficial to outlining a very clear roadmap for success and would enable compliance with CPRG. We would also recommend that the state government collaborate with the Providence-Warwick metro area that also applied for the CPRG funding to coordinate on goals and implementation plans to build scale and alignment across the broader region.

17. How would you like to see the results of the 2025 Climate Action Strategy shared with the public and various groups, beyond just the release of the final report?

If EC4 engages heavily with the public during the design of the Strategy, we recommend maintaining that level of engagement during the release and implementation of the Strategy. A communications plan, outlining the communication and engagement methods for the design and publication of the Strategy (including public forums, multi-media versions of the document, and a summarized version of the report in a simple narrative format with visuals that is easy to understand) will set EC4 up for success in rolling out the final report.

To maintain engagement throughout the implementation, it would be beneficial to establish monitoring and evaluation processes before the Strategy is finalized to identify key performance indicators and outcome measures (and the data needed to measure those) to measure success. Reporting on progress, impact, and challenges via the CPRG required status reports on a quarterly to semi-annual basis will be key to EC4 maintaining transparency in implementation and keeping the public and key stakeholders engaged. And, in alignment with Rhode Island's 2021 Act on Climate, we also recommend Rhode Island launch an online public dashboard that monitors and provides transparency on state emissions, the sources of those emissions, and displays progress towards meeting the Strategy's established measures. This dashboard can allow communities to track progress and actively engage in the state's decarbonization journey.

EC4 can also consider leveraging sensing tools for ongoing sentiment measurements of the public on their reactions to the plan and plan updates. This data could inform strategies to mitigate mis/disinformation related to climate change and related action in the state.

Ot-1: Inhabitant

**Comment Ot-1-1** 

Fact:

The competition against climate change begins with attacking the root cause of the problem which is the suppression of secret technologies that can end air pollution overnight.

Q:

What is the plan of action to uncover and release free energy technologies to and for the public ?

# Solution:

Watch & review the National Press Club on June 12th by Dr. Steven Greer

# Ot-2: Commercial Fisheries Center of RI; Fishery Friendly Climate Action L3c (Sarah Schumann)

## **Comment Ot-2-1**

See attached document

# **Ot-3: Act on Climate Implementers**

#### Comment Ot-3-1

See attached document