



Rhode Island Executive Climate Change Coordinating Council Advisory Board

To: Director Terry Gray, Chair of the Executive Climate Change Coordinating Council (EC4)
From: Sheila Dormody, Chair of the Executive Climate Change Coordinating Council Advisory Board
CC: Members of the EC4 Advisory Board
Date: December 10, 2025
RE: Rhode Island 2025 Climate Action Strategy

The Rhode Island 2025 Climate Action Strategy sends a clear message: Investing in climate solutions pays off. The projected benefits to Rhode Islanders will substantially outweigh the costs. Although implementation will require significant investment across multiple sectors, achieving the goals of the Act on Climate will deliver healthier communities, a stronger economy and workforce, and more resiliency to climate threats. The costs of inaction would impose far greater burdens on Rhode Island communities and our economy.

The Climate Action Strategy arrives at a critical moment. While the current federal administration has undermined, weakened or delayed action on the national level, it is more essential than ever that Rhode Island act with clarity, urgency and a sustained commitment to address the climate crisis. We must remain committed to the 2021 Act on Climate.

The Executive Climate Change Coordinating Council Advisory Board appreciates the EC4's leadership and robust community engagement in developing the Climate Action Strategy.

Successful implementation of the Climate Action Strategy will require sustained focus and political will. Though federal shifts may tempt us to scale back State action, our economic stability depends on making climate investments in a timely manner. The State will need to develop new strategies to fill the gap of federal inaction to maintain our climate commitments and legal responsibilities. Short term actions that are intended to reduce customer costs such as cutting investments in energy efficiency would undermine long term savings to ratepayers, undermine climate action, and reverse decades of progress. Each investment in energy efficiency brings benefits for every year to come.

Keeping our attention on the true, long-lasting benefits of climate investments will guide us toward achieving equitable outcomes for all Rhode Islanders.

The Advisory Board embraces our statutory obligation to advise the EC4, improve public access and support for the Climate Action Strategy, and assist the Council in meeting its transparency and accountability obligations and achieving the goals of the Act on Climate. As the EC4 continues to refine the key options for implementation, the Advisory Board will continue to be a conduit for providing public input and work in collaboration with the EC4 and the Science and Technical Advisory Board.

The deadline for the Advisory Board to submit this comment letter preceded the release of the EC4's priorities for implementation and is limited as such. The Advisory Board expects to provide additional comments as the State further refines sector-specific strategies, clarifies agency responsibilities, and develops detailed implementation pathways even after the 2025 Climate Action Strategy is released.

Key Considerations and Recommendations

Transparency, Accountability, and Further Refinement of the Strategy

- The Advisory Board has provided separate detailed recommendations for the State’s Climate Action Dashboard. To engage Rhode Islanders from all walks of life, the State will need to set clear, measurable goals and track progress toward them. While the current dashboard notes progress on a wide range of important initiatives, it is not yet a clear tool that can help to inform whether we are on track or need to adjust course. The emission modeling and sector-specific targets developed as part of the 2025 Climate Action Strategy should guide the dashboard’s representation of progress towards achieving the Act on Climate.
- The EC4 has provided several webinars to receive public feedback and an executive summary for public comment. Because the public has not had the opportunity to comment on a full draft plan or implementation priorities, the EC4 will need to continue to invest in public engagement to build buy-in to the Strategy and refine approaches to ensure they meet community needs. The Advisory Board is enthusiastic to partner in this role.
- A clear delineation of implementation priorities, responsibilities and timelines will be essential to evaluate the potential for the Strategy’s success. Urgency and actionability was a key theme that emerged during stakeholder engagement but is not yet reflected in the summary.
- Workforce development needs are acknowledged in only a preliminary manner. The Strategy must articulate a clear path from current workforce capacity to projected future requirements. The Strategy must also acknowledge that workforce development is only one component of addressing the role of jobs, and workers, in the transition to a net-zero economy.
- The Strategy describes emissions by sector but does not clearly explain what will be required of households, businesses, municipalities, and other economic actors to meet the State’s climate targets. This explanation is necessary for shared understanding and sustained participation in the transition.
- The Strategy must outline sector-specific emission reduction targets, to ensure action across all major sources of emissions and across all sectors in the state.
- A whole-of-government approach and a whole-of-economy approach will be required to achieve the mandate of the Act on Climate. State leadership will need to ensure that agencies coordinate closely, and municipalities and businesses must be provided with clear expectations and consistent support. All agency leaders should detail how their mandates and portfolios are aligned with the goals of the Act on Climate.
- State agencies must receive sufficient funding, staffing, and use their authority to implement the Strategy effectively.
- Based on the results of the Strategy, the EC4 must prioritize and task the legislature with which state legislation will be needed to implement the Climate Action Strategy.

Sector Specific Recommendations

The Advisory Board appreciates the technical and scientific findings of the Science and Technical Advisory Board’s (STAB) review of the modeling for the Climate Action Strategy. The STAB noted that while the Strategy determined that Rhode Island is on track to meet our 2030 greenhouse gas reduction targets, there are still significant uncertainties on the implementation path. We offer the policy considerations below in the context of the limitations identified by the STAB and with an eye toward ensuring we move with urgency to lay the groundwork right now for decarbonization strategies that will take several years to reap the full benefits.

Buildings

- Existing financial incentives will not be sufficient to achieve the heat pump adoption levels described in the Strategy. A combination of new policies, including building performance standards and a clean heat standard, and expanding incentives will be required to meet the necessary adoption trajectory.
- The Climate Action Strategy should not rely on biofuels to decarbonize sectors of the economy that are relatively easy to electrify such as buildings or passenger transportation.
- The State's current assumption that biodiesel combustion does not generate greenhouse gas emissions introduces significant risk to not meeting future targets.

Electricity

- The Climate Action Strategy acknowledges that major progress toward the State's climate goals will come from the Renewable Energy Standard, the law which requires 100% of the state's electricity to come from renewable sources by 2033. As building heating systems and transportation systems increasingly become powered by electricity instead of internal combustion, the Renewable Energy Standard will ensure that the electricity is clean. Rhode Island must not roll back its nation-leading Renewable Energy Standard.
- As noted above, expansion of energy efficiency will be a central component of any successful strategy. The current direction of shrinking the energy efficiency program will cost Rhode Islanders more.
- The Climate Action Strategy should place greater emphasis on the value of in-state distributed renewable generation. While the benefits of in-state distributed renewable generation are noted in the section on workforce development, local generation also provides real benefits in emissions reductions and contributes to a more reliable and affordable electric grid.

Transportation

- The Climate Action Strategy assumes an ambitious rate of electric vehicle adoption through 2030. Because that changeover is fundamental to the plan's success, it will require substantial incentives, faster deployment of charging infrastructure, and targeted support for residents of multi-unit dwellings.
- Rhode Island must consider feasible alternatives to the Advanced Clean Cars II and Advanced Clean Trucks programs if those programs become unattainable. A feebate system that charges a fee to more polluting vehicles and a rebate to less polluting vehicles may serve as an appropriate alternative and market driver.
- In addition to electric vehicle adoption, the Climate Action Strategy must consider the equity and access implications of our future carbon-free transportation system. Improvements to public transit and bicycle and pedestrian infrastructure must continue to be a key component of the climate strategy.
- Additional strategies such as land use changes or congestion pricing could also provide measurable transportation emissions reductions.
- Development of the Climate Action Strategy relied on transportation modeling commissioned by the Rhode Island Department of Transportation that was limited by existing budget assumptions and did not fully capture these opportunities. The further development of the State's implementation plans should more expansively consider the strategies that will be required to meet the needs to reduce emissions and serve Rhode Islanders with clean and convenient transportation options.

Rhode Island can meet its climate obligations only through a clear, robust, and equitable plan that is implemented with discipline and consistency. The State's environmental, economic, and social well-being depends upon action at the scale required by the climate crisis. We look forward to our continued partnership to work with the urgency and accountability this moment demands to deliver transformative and lasting benefits for all Rhode Islanders.