



## RHODE ISLAND

### DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

#### OFFICE OF THE DIRECTOR

235 Promenade Street, Room 425  
Providence, Rhode Island 02908

March 12, 2025

The Honorable David A. Bennett  
Chairman  
House Committee on Environment and Natural Resources  
82 Smith Street  
Providence, Rhode Island 02903

**RE: H 5493 An Act Relating to Health and Safety – Building Decarbonization Act of 2025**

Dear Chairman Bennett,

Thank you for providing the Department of Environmental Management (DEM) the opportunity to comment on H 5493, which aims to reduce greenhouse gas emissions from buildings. DEM respectfully opposes this legislation and has concerns related to the specific requirements it would put in place. We urge the legislature to instead consider enactment of the proposal found in Article 3, Section 15 of the Governor's Fiscal Year 2026 budget.

In 2024, the General Assembly approved H 7617 Substitute A, which requested that the Executive Climate Change Coordinating Council (EC4) complete a report providing "recommendations for the implementation of benchmarking and building performance standards for large existing buildings in Rhode Island...including both publicly and privately owned buildings." The resolution also requested that the report include recommended approaches and implementation plans related to several facets of the same topic.

Earlier this year, the EC4 submitted its final report to the General Assembly pursuant to this resolution. The report identified barriers to implementation of requirements such as those included in H 5493. These barriers include the lack of an existing statewide inventory of large buildings, limited energy usage data for municipal and private buildings, and the lack of infrastructure necessary to collect energy data on the scale required by the bill. The report also notes the need for additional staff and funding to support the work even if the identified barriers were overcome.

With the above constraints in mind, the Governor proposed in Article 3, Section 15 of the FY 2026 budget a more modest, but still extremely meaningful, proposal to implement energy benchmarking and building performance standards. That proposal would institute energy

benchmarking requirements for large state facilities of 25,000 square feet or more along with a building performance standards program for the same facilities.

We appreciate the opportunity to offer comments on this legislation and would be pleased to make ourselves available as needed. Please feel free to contact Ryan Mulcahey, DEM Director of Legislative Affairs, at [ryan.mulcahey@dem.ri.gov](mailto:ryan.mulcahey@dem.ri.gov) should you have any additional questions or wish to discuss this matter further.

Sincerely,

A handwritten signature in dark ink, appearing to read "Terrence Gray". The signature is fluid and cursive, with the first name "Terrence" being more prominent than the last name "Gray".

Terrence Gray, P.E.  
Director

cc: Members of the House Committee on Environment and Natural Resources  
The Honorable Rebecca Kislak  
Nicole McCarty, Esq., Chief Legal Counsel to the Speaker of the House  
Lynne Urbani, House Policy Director