

Chairman Barrett;
House Environmental Natural Resource Committee

RE: Support for H 7484

Dear Chairman Barrett

My name is Bart Lloyd. I live in Newport and am a retired affordable housing attorney.

H 7484 would require developers of large new buildings, (50,000 sq. foot (and greater) buildings on 50,000 sq.foot (and greater) lots) to file carbon impact reports as a part of their permitting process.

The carbon impact report would require the applicant to show how they will conform to the Act on Climate requirement that we are 100% carbon-free by 2050. The applicant is allowed to presume that electricity will be 100% renewable carbon-free energy.

Developments of this size will already have engaged an architect, an engineer, and in most cases a project management professional; any of whom are authorized to prepare the report. This bill would not require the developer to engage any new third party professional to comply. The report would be submitted to the building inspector of the town in which it is located.

The bill does not mandate how the applicant complies with the law. It leaves it open as to how they will comply. At a minimum,

an all-electric (or electric ready) building would, in most cases, seem to comply.

These buildings are enormous energy users, that will likely be in service for 50 to 100 years; and we cannot today allow them to be energy albatrosses that materially undermine our Act on Climate obligations for years to come.

The Act on Climate is a broad social mandate. But it is also in many respects a health and safety law, not materially different from laws regulating water, sewage, elevators and numerous other health and safety aspects. Requiring large buildings to meet increased standards with respect to those aspects is well within our typical regulatory practices.

At the hearing yesterday, it was pointed out that applying to all building permit applications as of December 31, 2026 may be too early for both developers and administrators to become familiar with the requirement, and to adjust their applications accordingly. Amending that date to December 31, 2027 would seem to be a reasonable amendment.

Conforming our actions, practices, habits and expectations to the Act on Climate will require many adjustments. This bill is one of those adjustments, and affects particularly large energy users, is reasonably doable, and is prospective and avoids making our future tasks more expensive and difficult than they need to be. For those reasons, it is one that we should implement sooner, rather than later.

Thank you.

W. Bart Lloyd
16 Chestnut St.
Newport, RI 02840