TOWN OF WARREN, RHODE ISLAND
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Office of Town Manager

January 17, 2023

Kimberly Korioth
RI Infrastructure Bank
235 Promenade Street
Suite 116
Providence, RI 02908

RE: Draft Regulations / Ocean State Climate Adaptation and Resilience Fund (RICR-30-05-01)

Dear Ms. Korioth,

I am writing with comment on Rhode Island Infrastructure Bank's draft regulations for the newly created Ocean State Climate Adaptation and Resilience fund, known as OSCAR (RICR-30-05-01).

The Town of Warren, through letters of testimony and Town Council resolutions, supported passage of the OSCAR legislation starting in 2018, when the bill was first introduced. I testified in person at least two legislative hearings during that period as part of the town's efforts to protect and ensure environmental health while maintaining and improving public access. The Town of Warren's support for climate adaptation project grants stems from our experience with a wide range of adaptation and resilience initiatives, including, but not limited to: stormwater and wastewater system improvements, coastal wetlands, and relocation of vulnerable homes and businesses out of flood-prone areas of our town. The Town greatly appreciates that the OSCAR program, which passed into law in 2021 and received funding in 2022, is a grant program that will not require municipal match of dollars.

The Town respectfully submits the following comments on the draft OSCAR regulations:

Section 1.4 B. Grant Awards – As drafted, "Request for financial assistance shall be submitted in writing by the Chief Executive Officer or other authorized officer of the Applicant to the Council and the Department in accordance with the open solicitation process pursuant to R.I. General Laws 46-23.3-6."

Comment: It would be of significant help to the Town and other municipalities if an application form was required by the regulations. Such a form should provide clarity for both the applicant and the Technical Advisory Committee and create a more efficient process for all involved.

Section 1.6 Grant Application Review, specifically that applications shall be reviewed based on "preferences that align with the state's prevailing economic development plan."

Comment: Our concerns here are 1) the OSCAR law contains nothing about economic development plans, be they state or local. The OSCAR law does clearly spell out that the fund is for: projects on public that advance adaptation and resiliency of natural systems; 2) how can municipalities be expected to prepare and submit plans that "align with the state's prevailing economic development plan" when no single plan exists. The Town recommends that any references to "preferences that align with the state's prevailing economic plan" be removed.

Thank you for considering the Town of Warren's comments to the draft regulations for the new OSCAR program. We look forward to applying for project grants to assist the Town in conducting measures that will help its environment adapt to rapidly changing conditions caused by climate change.

Sincerely,



Kate Michaud, AICP CC-P
Town Manager
Town of Warren, Rhode Island