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Climate and Community Advocates Call for Public Process for the RI Department of Transportation's Carbon Reduction Plan

Comment Letter

INTRODUCTION

The transportation sector is the State of Rhode Island's largest source of greenhouse gas (GHG) emissions, at 39.7% in the most recent 2019 GHG inventory. Between the 2016 and 2019 inventory, transportation emissions increased by 8.8%. Transportation is thus at the center of strategic actions which the state needs to advance to meet the mandates outlined in the Act on Climate. The **2022 Climate Update** released by the RI Executive Climate Change Coordinating Council (EC4) highlights the need for the Rhode Island Department of Transportation (RI DOT) to better understand how projects in the State Transportation Improvement Program (STIP) contribute to GHG emissions. This must involve improving the modeling of GHGs and establishing performance measures to help reduce those emissions. Due to federal guidelines, specifically the passage of the Infrastructure Investment and Jobs Act (IIJA), RI DOT has been further required and prompted to develop a Carbon Reduction Plan, in order to qualify for federal funding. \$35 million is available from FY 2022-2026 and funds must be used for cost-effective emissions reduction projects in the STIP.

RHODE ISLAND'S TRANSPORTATION CARBON REDUCTION PLAN DESERVES A PUBLIC PROCESS

Despite the inclusion of the creation of a Carbon Reduction Plan (CRP) in the 2022 Climate Update, there has been limited mention of the status of development of the plan throughout 2023 for engagement by stakeholders. RI DOT presented on the CRP at the June 2023 EC4 meeting, with limited opportunity for discussion by the EC4 or public comment. The CRP has not been raised as a topic of discussion at any Transportation Advisory Committee meeting in 2023. Carbon Reduction Plans (CRPs) from the states must be completed by November 15, 2023. To date, RI DOT has failed to facilitate any opportunity for public review of methodology or strategies for feedback and input from stakeholders. **With less than two months remaining, we as climate advocates are concerned by the absence of public process surrounding a document with such significant implications for how transportation projects will be analyzed and funded in the years and decades to come.** In contrast, other agencies of the McKee administration have recently facilitated basic public comment processes related to climate, including the EC4 spending plan, the RFP for the 2025 climate strategy, DEM's Equity Commitments, Solar for All funding, and the RFP for energy efficiency program administration.

We urge RI DOT to (a) publicly share the current draft of the CRP as soon as possible in an online format that allows for expedited public review and comment, **and to (b) host a public forum** by 10/20/23 to provide ample time for staff to provide a summary of public and stakeholder feedback to the State Transportation Advisory Committee (TAC) before its scheduled 10/26/23 meeting. This would be necessary for the TAC to provide an informed recommendation to the State Planning Council (SPC) prior to the SPC's 11/9 meeting at which RI DOT is expected to be seeking CRP approval before the 11/15/23 federal deadline for plan adoption. Stakeholders, as well as the Transportation Advisory Committee (TAC) and the State Planning Council (SPC), need ample time

to review and provide comments to the current draft plan. Staff of the RI DOT also need ample time to process and incorporate changes into the CRP. An understanding of RI DOT’s agreement or disagreement with proposed comments and willingness to incorporate changes into the CRP is a critical piece of a meaningful public process.

According to the US Department of Transportation’s **recent guidebook on meaningful public involvement**, “To ensure that individuals and communities have an equitable voice in transportation decision-making processes, practitioners should address barriers to meaningful public involvement, especially in historically underserved communities. Barriers include internal thought processes such as “we’ve always done it this way,” reliance on one-size-fits-all methods, and a lack of organizational accountability.” While expediting a public process with an immediate online public review and public forum may draw valuable input from those already engaged, it does nothing new to address barriers to meaningful public involvement in historically underserved communities. In light of RI DOT’s assertion of the CRP as a living document, **we urge RI DOT to facilitate meaningful public involvement on the CRP in underserved communities in the first quarter of 2024.**

CONCERNS REGARDING CRP METHODOLOGY AND APPROACH

While documents have not been shared publicly, advocates have a number of concerns regarding the development of the CRP based on RI DOT’s June 2023 presentation and limited information on methodology.

- RI DOT’s STIP analysis estimates emission reductions in association with traffic operation and flow improvements, as well as capacity expansion. This approach places significant weight on the short-term flow improvements and ignores the concept of induced demand, which has demonstrated that, **in the long-term, the presence of the infrastructure will lead to increased traffic and therefore increased GHG emissions.**

Current Progress: STIP Emissions Reduction Analysis

| STIP Project | Primary Actions | Project Type(s) | Projected Cost | Estimated GHG Effects Upon Completion |
|---|---|--|----------------|---|
| Opening of Cranston Canyon | Rebuild six structures in Bridge Group 51B; create and reorient lanes at I-295 North. | Traffic operation and flow improvements; roadway state of good repair. | \$85M | Annual emissions reduced by ~4,095 tons CO2e / year |
| Route 146 Reconstruction | Bridge replacements; roadway repaving; traffic signal removal. | Traffic operation and flow improvements. | \$196M | Annual emissions reduced by ~5,922 tons CO2e / year |
| Completion of the I-95 Missing Move and Quonset Connector Ramps | Construct two new highway ramps to complete the interchange of I-95 and Route 4. | Traffic operation and flow improvements; capacity expansion. | \$135M | Annual emissions reduced by ~513 tons CO2e / year |



- A “sketch-level” analysis for STIP GHG emissions and VMT reductions is insufficient. RI DOT lacks an internal method to estimate vehicle miles traveled (VMT) and RI DOT does not appear to intend to hire a consultant that would be able to more accurately model the VMT reduction impacts and associated GHG reductions. Modeling VMT reductions from policy interventions is complex and the proposal to do so with a ‘custom spreadsheet tool’ is insufficient. Further, the CAPCOA handbook is inadequate for state level VMT reduction planning. This project-level analysis provides the foundation for altering current and projected transportation investments in order to meet the Act on Climate mandate.
 - It is also important to go beyond a “sketch-level” analysis in order to quantify the emissions reduction impacts of the strategies already implemented or proposed in Rhode Island.
- STIP projects currently selected for CRP funding focus heavily on congestion management and traffic flow improvements -- not on shifting more trips to travel modes that emit less carbon. Of projects which encourage alternative travel modes, RI DOT dedicates a very small proportion of funding to sidewalk installation (3%) and a larger proportion to bike path resurfacing. While Rhode Island’s bike paths are an incredible recreational (and in cases, commuting) asset, maintenance of existing bike paths does not contribute to the very significant transportation mode shift that is needed to reduce carbon emissions; safe, separated, connected bikeways and improved transit are needed to encourage mode shift. As carbon emissions are reduced, it is important to find a viable funding alternative to the gas tax to maintain and expand RIPTA’s operations.

Next Steps: CRP Project Identification

- STIP Projects *Currently* Selected for CRP Funding:

| STIP Project Type (Eligibility Criteria #) | CRP Funding (\$ million) |
|---|-----------------------------|
| Sidewalk Installation (1) | 0.6 |
| Bike Path Preservation (1) | 7.1 |
| Statewide Congested Corridors Upgrades (2) | 6.0 |
| ITS Additions; Congestion Management (2) | 2.8 |
| Safety Service Patrol (2) | 1.6 |
| Traffic Signal Management (2, 3) | 1.2 |
| Smart Corridors Initiatives (2) | 0.2 |
| TOTAL | 19.5 |

- Project Eligibility Requirements (Abbreviated) – May Reduce Emissions Via:

1. Encouraging Alternative Travel Modes
2. Congestion management or traffic flow improvements
3. Energy-efficiency Improvements for traffic control devices
4. Supporting deployment of alternative-fuel vehicles
5. Facilities emissions reductions



- While we applaud the state and the Department of Environmental Management (DEM)’s forthcoming adoption of Advanced Clean Cars II and Advanced Clean Trucks regulations, this changing landscape also requires a parallel effort by the state to rapidly expand EV charging infrastructure. We applaud the \$23 million National Electric Vehicle Infrastructure (NEVI) program funding to build DC fast charging stations along the I-95 corridor and later, Route 146. However, federal funding plus the private market cannot be expected to meet all charging needs, especially since electric vehicles are often charged at home. The state must plan to fill this

gap with, for example, efforts to support renter and multi-family charging. Additionally, Rhode Island Energy's (RIE) EV programming must be a key piece of supporting charging needs. RIE plans to file an EV program with the Public Utilities Commission this fall that includes make-ready, off-peak charging rebates, and programs for pole-mounted chargers. While we support and very much need these programs, Green Energy Consumers Alliance's [memo](#) outlines what they must include to adequately support EVs and reduce emissions.

- Plans for stakeholder coordination have not been shared, despite a November 15 deadline. To what extent has RI DOT requested technical assistance or consultation from the Federal Highway Administration, the MPO (Division of Statewide Planning), and/or the EC4? Why or why not? With less than two months, how does RI DOT plan to solicit and process public comment?

The development of RI DOT's Carbon Reduction Plan represents a critical step in tackling GHG emissions from the transportation sector. **We as climate advocates urge the Rhode Island Department of Transportation to publicly share a draft of the CRP and host a public forum as soon as possible and to allow ample time for stakeholders to review and provide comments.** We feel that the Executive Climate Change Coordinating Council (EC4), Division of Statewide Planning, and the Transportation Advisory Committee may each play a role in ensuring a fair public process that addresses our current concerns and others which may arise from further transparency. **Applying a lens of emissions reductions will likely significantly alter the current and future allocation of CRP funding to STIP projects and requires more accurate modeling of the VMT and GHG reduction impacts of specific policy interventions.** Further, emissions reduction analysis must inform not only the allocation of \$35 million in CRP funding, but also the prioritization of all STIP projects and RI DOT investments.

The [U.S. National Blueprint for Transportation Decarbonization](#) states, "A decarbonized transportation system can mobilize a sustainable economy that benefits everyone. As our transportation system and communities are increasingly threatened by worsening climate impacts such as hurricanes, wildfires, flooding, heatwaves, and drought, decarbonizing the sector is essential to addressing this existential crisis."

Thank you for your consideration of our concerns and request for a public process.

Sincerely,

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CC:

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