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# Climate and Community Advocates Call for More Impactful Strategies and Emission Reductions Analyses in RIDOT's Carbon Reduction Strategy

Comment Letter

## INTRODUCTION

The transportation sector is the State of Rhode Island's largest source of greenhouse gas (GHG) emissions, at 38% in the most recent 2020 GHG inventory. 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.

We, the 20 undersigned organizations and associated individuals, are writing together to propose constructive amendments to the inaugural Carbon Reduction Strategy (CRS) of the Rhode Island Department of Transportation (RIDOT) to address the following concerns.

RIDOT's Carbon Reduction Strategy fails to:

- Place the state on a pathway to meeting the Act on Climate.
- Invest meaningfully beyond congestion management or provide transparency regarding the prioritization of strategies.
- Quantify emissions reductions associated with STIP projects.
- Engage the public on the development and prioritization of carbon reduction strategies.

## RIDOT STRATEGIES DO NOT MEET ACT ON CLIMATE MANDATE

- Rhode Island's transportation sector is not on track to meeting its proportionate Act on Climate mandates and RIDOT acknowledges that its existing programs do not move the needle on carbon reduction. In particular, RIDOT's target to only reduce transportation-related carbon emissions to 2.79 million metric tons per year by 2030 is wildly inadequate and will likely cause the state to miss its critical 2030 target under the Act on Climate. Despite this, the investments proposed for CRP funding do not reflect the scale of emission reduction required to change the status quo.
- RIDOT must make tangible commitments to strategies (i.e. reducing 'vehicle miles traveled' (VMT's), driving meaningful mode shift) which will move the state on a trajectory to reduce emissions 45% by 2030 and reach net zero emissions by 2050.

## STRATEGIES TO REDUCE CARBON EMISSIONS BEYOND CONGESTION MANAGEMENT

- Elimination of strategies that rely on costly highway capacity expansion projects to reduce congestion, idling and greenhouse gas emissions (see p. 27). For more on why we recommend this, see induced demand<sup>1</sup>.
- A commitment to implementing Rhode Island's nearly 3-year-old Transit Master Plan (TMP<sup>2</sup>) and Bicycle Mobility Plan (BMP<sup>3</sup>). The TMP is projected<sup>4</sup> to achieve 80% of the State's 2050 target for reducing vehicle miles traveled

- (VMT) and related emissions, and yet there has been no meaningful commitment to fund its implementation.
  - o Funding any/all of the capital projects within the TMP/BMP would go a long way in helping with mode shift.
- Recognition that investment in bike path “preservation” does not constitute a “mode-shift” strategy (see p. 24 and 30). Robust investment in “new” bike infrastructure would achieve this important change.
- Few details are provided on STIP projects assigned for the remaining CRP Funding and the nature of how such projects encourage mode shift among residents (Table 9.2)<sup>5</sup>.
  - o RIDOT must provide transparency as to what criteria were used to prioritize these projects over others, and include the associated STIP project number.
- Acceleration of electric vehicle (EV) adoption beyond vehicle standards. We applaud the fact that the Department of Environmental Management (DEM) has begun the rule-making process for Advanced Clean Cars II (ACCII) and Advanced Clean Trucks (ACT), since these standards are crucial to reduce emissions from on road vehicles. However, the adoption of these standards alone will not result in the needed greenhouse gas emissions reductions, as supported by RIDOT’s own analysis. The Carbon Reduction Strategy must also address the need to build out charging infrastructure for EVs – particularly for people who live in multi-unit dwellings on the consumer side and particularly for fleets on the commercial side – beyond taking advantage of the National Electric Vehicle Infrastructure (NEVI) program. Relying on NEVI alone will not result in the charging infrastructure we need to make sure all Rhode Islanders have access to the lower fuel and maintenance costs of EVs if they need a vehicle.

## FAILURE TO MEASURE CARBON EMISSIONS REDUCTION POTENTIAL

- Outside of three large, congestion management projects, RIDOT does not calculate project-level emission reductions associated with STIP projects.
  - o How can RIDOT weigh carbon reduction impacts without measuring them?
  - o The Cranston Canyon (\$85M), Route 146 Reconstruction (\$196M), and the Missing Move (\$135M) cannot be taken as representative of emissions reductions that might be achieved through a wide range of other STIP investments.
    - ▣ Equivalent investments (\$416M) in alternative strategies which, for example, reduce VMTs or promote mode shift, would have wholly different outcomes and require distinct emissions reduction analysis.
  - o The sketch-level cost effectiveness analysis of categories of emissions reductions strategies is insufficient and ignores the negative impact of traffic flow improvements on creating new single occupancy vehicle (SOV) trips.
- Commit to developing an innovative tool modeled after one being used in Colorado to cut greenhouse gas (GHG) emissions by estimating emissions for each transportation project in its multi-year pipeline of investments. Colorado can then meet the required reduction levels by either reprioritizing projects or by investing in additional measures that reduce GHG emissions. Rhode Island should apply this approach to its 10-year, \$9 Billion pipeline of transportation projects.

## LACK OF STAKEHOLDER PROCESS

- RIDOT must facilitate meaningful public involvement on the development and implementation of carbon reduction strategies.
  - o Please make all comments received public and respond to what aspects of public feedback are and are not incorporated into the plan.
  - o Facilitate public workshops beyond the submission of the plan. The stakeholder workshop referenced was intended to be for state agencies and was not open to the public.

States have significant discretion over how federal funding is spent<sup>6</sup>. We as climate and community advocates urge RIDOT to center (a) achieving Act on Climate goals, (b) project-level emissions reductions analyses, and (c) robust stakeholder engagement in its project selection criteria for Carbon Reduction Program (CRP) and STIP funding. These proposed amendments to RIDOT's Carbon Reduction Strategy are necessary to accelerate reductions in transportation emissions in both the short and long term.

Thank you for your consideration of our feedback. We would greatly appreciate a dialogue and response regarding these specific proposed amendments.

Sincerely,

Emily Koo, Acadia Center

John Flaherty, Grow Smart RI

Jed Thorp, Clean Water Action

Jeanine Silversmith, Rhode Island Environmental Education Association

Sue AnderBois, The Nature Conservancy

Amanda Barker, Green Energy Consumers Alliance

Bari Freeman, Bike Newport

Kathleen Gannon, Rhode Island Bicycle Coalition

Patricia Raub, RI Transit Riders

Liza Burkin, Providence Streets Coalition

James Crowley, Environment Council of RI

Christian Roselund, Providence Urbanist Network

Caitlin Sanford and Jeff Migneault, Climate Action Rhode Island

Darrèll Brown, Conservation Law Foundation

Gayle L. Gifford, concerned Providence resident

Eugenia Marks, M.A. Brown University, Environmental Studies

April Brown, Providence Racial and Environmental Justice Committee

Mel Rainsberger, Providence 48 Hour Film Project

Paul A. Roselli, Burrillville Land Trust

Ken Payne, Civic Alliance for a Cooler Rhode Island

## SOURCES

1. The theory of induced demand asserts that as roadways become wider and able to accommodate higher volumes of traffic, additional vehicles will materialize as drivers feel incentivized to use the expanded road due to the belief that added lanes have reduced congestion. Source: Planetizen. "What is Induced Demand?". <https://www.planetizen.com/definition/induced-demand>.
2. RIPTA. Transit Forward RI 2040, Rhode Island Transit Master Plan. December 2020. <https://www.ripta.com/transitforwardri/>.
3. Rhode Island Statewide Division of Planning. Moving Forward RI 2040, Statewide Bicycle Mobility Plan. December 2020. <https://planning.ri.gov/planning-areas/transportation/long-range-transportation-plan/bicycle-mobility-plan-documents>.
4. Grow Smart RI. <https://growsmartri.org/wp-content/uploads/2023/07/TMP-VMT-Reduction.pdf>
5. Over a third of remaining CRP funds (\$4.1M) is allocated to Bridge Group 4R (Transit Operating Support).
6. States have significant discretion over how Carbon Reduction Program funding is spent: <https://rhodeislandcurrent.com/2023/10/16/big-federal-dollars-for-small-state-projects-aim-to-get-more-cars-off-the-roads/>; Highways dollars can be spent on transit infrastructure, especially the capital projects within the Transit Master Plan: <https://transitcenter.org/want-to-use-highway-dollars-for-transit-these-places-already-do/>

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