

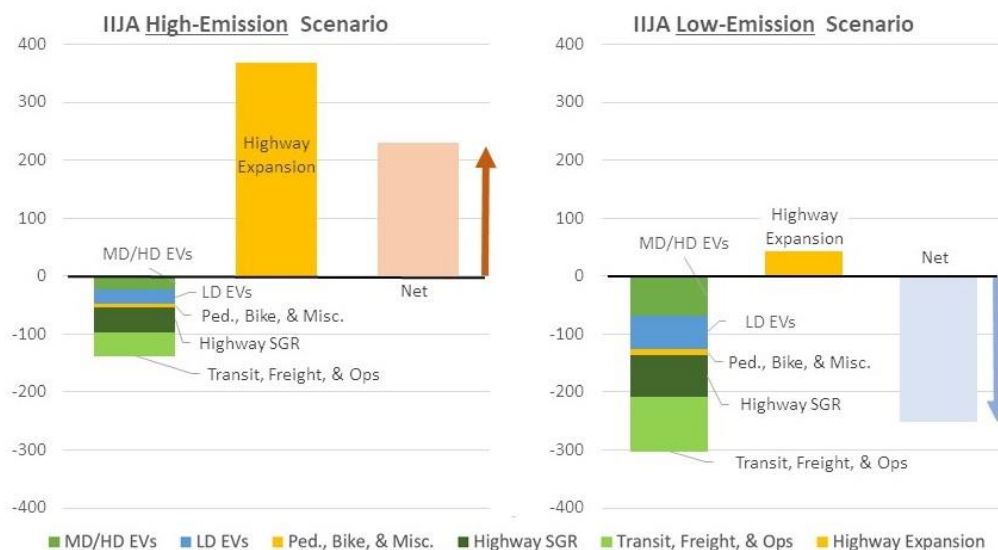
## MEMO: A review of Statewide Transportation Improvement Plan (STIP) Minor Amendment #2 from a climate perspective

**What:** The Infrastructure Investment and Jobs Act (IIJA) has allocated of \$550.81 million from 2022-2025 and a total addition of \$748.43 million from 2022-2031 to invest in achieving and maintaining a state of good repair for Rhode Island's transportation infrastructure.

RIDOT and RIPTA have proposed [Minor Amendment #2](#) to the [Statewide Transportation Improvement Plan \(STIP\)](#) to allocate the incoming IIJA funds. The STIP is a list of all the projects that RIDOT and RIPTA will undertake from 2022 to 2031, as well as the funding sources to execute them. On February 17<sup>th</sup>, the Transportation Advisory Committee will vote on whether to recommend approval of the minor amendment. [Public comment is due February 14<sup>th</sup>](#).

**Why it matters:** The IIJA represents a historic investment in the underpinnings of our economy, especially when it comes to transportation. An assessment by the [Georgetown Climate Center](#) found that the IIJA can help reduce climate-warming emissions from the transportation sector if funds are invested in transit, active mobility, and electric vehicle (EV) infrastructure. On the other hand, the IIJA has the potential to increase emissions and make our climate problem worse by expanding highways or failing to invest in clean transportation.

### Cumulative MMT of CO<sub>2</sub> Emissions, relative to Baseline GHG, 2022 to 2040



**How will this STIP amendment affect RI's ability to meet Act On Climate goals?**

In Rhode Island, the IJA funding formula translates to over \$550 million (excluding the possible additional support from competitive grants). Ideally, every dollar of IJA would be carefully considered as part of a larger climate mitigation strategy for transportation. However, there are a few key pots of money that are specifically allocated to help the state to kickstart investment in clean transportation, improve resiliency in the face of worsening storms due to the impact of climate change, and help the state meet its mandatory and legally-enforceable greenhouse gas emissions reduction target (Act On Climate):

- \$24.71 million for Promoting Resilient Operations for Transformative, Efficient, and Cost-Saving Transportation (PROTECT) Funds
- \$18.28 million for National Electric Vehicle Formula Program Funds
- \$25.45 million for Carbon Reduction Program Funds

\$68.44 million out of the total \$748.43 million is probably not enough to undo the transportation sector's contribution to climate change, but it should be a good start, especially before the Executive Climate Change Coordinating Council (EC4) releases its [2022 update to Rhode Island's climate plan](#). Unfortunately, in each of the above categories, the investments listed in the proposed amendment to the Rhode Island STIP are allocated to projects that don't move the needle on emissions to the fullest extent possible.

**PROTECT Funds**

The goal for this funding is to make our surface transportation infrastructure more resilient, including through the use of natural infrastructure, to the effects of extreme weather and natural disasters. Here are a few examples of what the STIP proposes:

<b>Minor Amendment #2 Location</b>	<b>STIPID</b>	<b>Project Name / Description</b>	<b>Amount (\$ millions)</b>	<b>Comment</b>
Page 22	7152	Transit Master Plan Carbon Reduction Investment - This is a new line item to the STIP that will utilize new PROTECT funding provided under the IJA to implement the objectives of the Transit Master Plan. This project may be formally bundled with TIPID 7151,	5.90	<i>Sounds good, but lacking in detail and if it's a new line item, why was this introduced as a minor amendment?</i>

		Transit Master Plan Investments, at a later date.		
Page 239	1274	I-295 (I-95 to RI-5) - This line item involves resurfacing of Interstate 295 from Interstate 95 in Warwick to RI-5 Greenville Avenue. Improvements to safety and stormwater may be included as part of this project	0.88	<i>Sounds good if the roads will be more stormwater resilient, but "may be" language pops up in a few places.</i>
Page 258	1324	Veterans Memorial Parkway (Warren Ave to South Broadway) - This line item involves resurfacing of the roadway and improvements to highway lighting fixtures. Additional improvements to safety and stormwater may be included as part of this project.	2.44	<i>Again, "may be" language is concerning.</i>

### Carbon Reduction Program Funds

The goal for this funding is to [invest in projects that support a reduction in transportation emissions](#). Possible investments include transportation electrification and EV charging, public transportation, including Bus Rapid Transit, infrastructure for bicycling and walking, intelligent transportation systems (ITS) improvements, infrastructure to support congestion pricing, diesel engine retrofits, and port electrification. States are also required to develop emission carbon reduction strategies.

Here's a breakdown of a few key projects that are moving forward because of the CARBON funding source.

Minor Amendment #2 Location	STIPID	Project Name / Description	Amount (\$ millions)	Comment
Page 13	12111	Bike Path Resurfacing and Preservation - support ongoing preservation of bicycle and shared use paths	26.00	<i>Resurfacing and maintenance do not decrease emissions</i>
Page 17	12117	ITS Additions to Capital Projects	8.5	<i>Monitoring</i>

		- Camera sites for monitoring congestion and improving response time to highway accidents; tracking congestion and freight movement; workzone safety systems for safety and congestion management; standalone CMS signs; weather monitoring sites for winter operations		<i>congestion does not decrease emissions; neither do highway signs</i>
Page 22	12114	Welcome Center Truck EV Charging/Other Improvements - to support the construction of electric vehicle charging stations for trucks at the Welcome Center on I95 North	1.5	<i>Good, but confusing as to why the Carbon Reduction Fund is being used to support this, while the EV Program is not</i>

In addition to the concerns on the line items above, it's not clear how exactly DOT will proceed with developing "carbon emission reduction strategies" as is encouraged by the Carbon Reduction Fund guidelines.

**National Electric Vehicle Formula Program Funds - \$18.28 million**

This funding is mentioned on Page 3 of Minor Amendment #2 but does not seem to be supporting any EV charging infrastructure projects in the amendment. The only EV charging infrastructure project in the entire STIP (STIPID 12114) is supported by the Carbon Reduction Fund, so it's unclear how the \$18.28 million will be utilized at this point.

**Key Concerns:**

**1. No consideration of the Act On Climate, and no analysis that assesses projects according to their emissions impact.** Transportation is the largest emitting sector in Rhode Island. By failing to align investments with the mandate to reduce emissions, approving Minor Amendment #2 to the STIP will jeopardize Rhode Island's ability to meet its climate mandate. There's not enough information on STIP projects to indicate whether they will increase or decrease greenhouse gas emissions overall, and that's not adequate considering the extent of emissions reduction required by the Act On Climate.

**2. Poor allocation of climate-specific funding within the IJA.** \$25.45 million for Carbon Reduction should be used to the fullest extent to decrease emissions. Repaving and

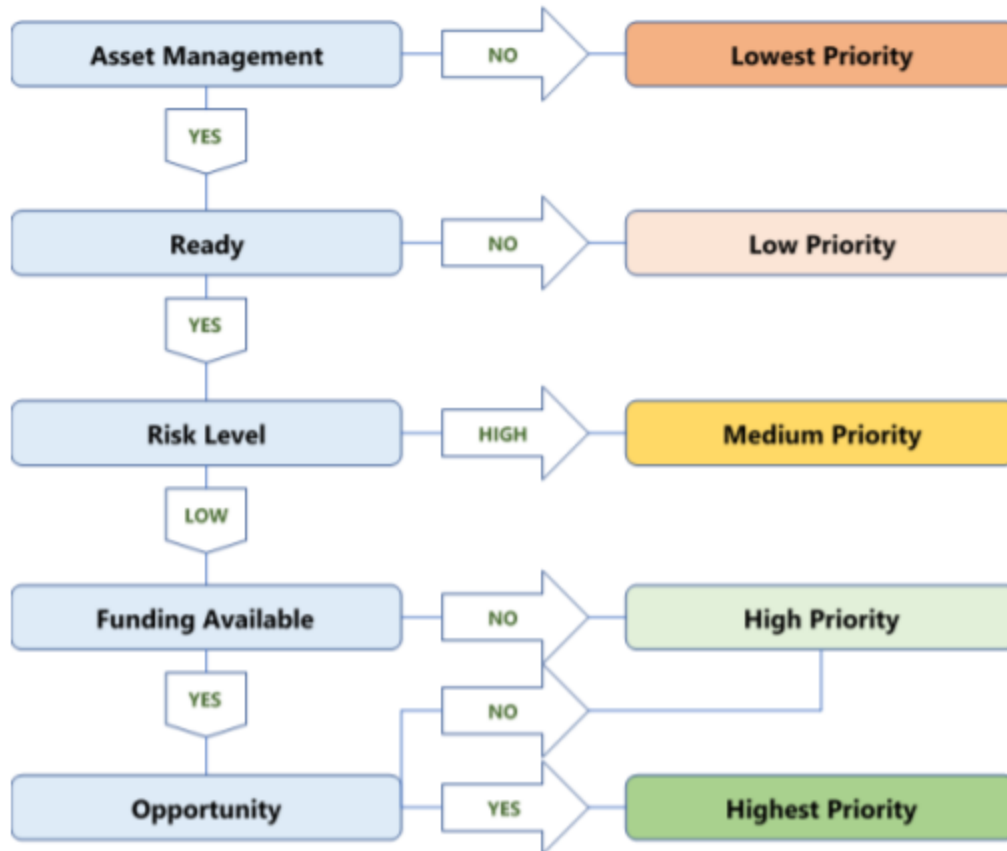
maintaining existing bike paths is not going to decrease emissions; neither are highway signs. We need bigger, bolder investments that will create new active mobility paths, improve transit, or expand EV charging. The IJA money should be prioritized on projects that will deliver the biggest bang for our buck to reduce emissions by 2030. Without an analysis of expected GHG-emissions reduction, there's no way to compare how investments will impact the state's 2030 goal.

### **3. Minor Amendment #2 should not have been proposed as a “minor amendment.”**

The main [distinction](#) between major and minor amendments whether the cost of the relevant project addition or deletion is under or over \$10M in the first 4 years of the STIP and whether project costs are under or over \$20M in the last six years of the STIP. It's concerning that the allocation of a historic \$550 million contains no new project additions worthy of a major amendment. Submitting a minor amendment also [does not require public hearings and limits public notice to 10 days](#). Proposing IJA allocations through a minor amendment limits the opportunity for more robust public engagement.

#### **Key recommendations:**

1. **Adopt a rule to assess current STIP on the basis greenhouse gas emissions impact:** The only way to meet the 2030 Act On Climate mandate is to prioritize investments that are known to reduce emissions- improving transit frequency and service, increasing the network of active mobility paths, and building out EV charging network. The [Colorado Transportation Commission](#) just approved a rule that requires State DOT and its 5 MPCs (metropolitan planning councils) to measure climate impact of its investments and offset them. The rule is estimated to shift \$6.7 billion through 2050 to transit and active mobility. Emissions impact needs to be part of the prioritization process for STIP projects in Rhode Island; the first step is to assess the impact of the existing STIP. No spending on a project should move forward until an assessment has been done unless it is for public safety (i.e. repairing bridges).



*Figure 1 -- Project Prioritization Process*

*This is the existing prioritization process for transportation projects in Rhode Island. There's no explicit consideration of climate.*

2. **Propose new investments that better align with the goals of the Carbon Reduction Fund and Act On Climate mandate.** It should be clear that repaving existing bike paths will not reduce emissions as much as expanding the network of bike paths to allow Rhode Islanders to travel safely by bike or foot across the state. The Carbon Reduction Fund is a unique opportunity to make investments that will allow Rhode Islanders to transition to cleaner transportation options. After the STIP is assessed according to greenhouse gas emissions, new investments supported by the Carbon Reduction Fund should be prioritized according to their ability to reduce carbon emissions.
3. **Submit a proposal to spend IIJA funding as major amendment to provide a more robust public engagement,** Public engagement of climate, environment, transit, and active mobility stakeholders is necessary to capitalize on the historic funding opportunity provided by the IIJA. The next proposal to allocate IIJA dollars should include new projects and be introduced as a Major Amendment to the STIP

in order to ensure a robust engagement process occurs. The Executive Coordinating Council on Climate Change (EC4) should be engaged to create a strategy for reducing transportation emissions to guide infrastructure investments in the future.