



July 12, 2021

We, the nine undersigned organizations, are writing together to urge the Rhode Island Division of Statewide Planning, RI Department of Transportation, and RI Public Transit Authority to better consider the impact of climate-warming and health-harming emissions in the proposed State Transportation Improvement Program (STIP) for 2022 to 2031.

The STIP does not reflect the emissions reduction mandate established by the Act On Climate.

Act On Climate, signed into law in April 2021, mandates that Rhode Island achieve a 45% economy-wide reduction in greenhouse gases compared to 1990 levels by 2030. Transportation is the state's largest source of climate-warming emissions, making up 36% of the total. Any plan to meet the state's 2030 emissions target must include a strategy for decarbonizing transportation. As proposed, the STIP for 2022 to 2031 does not acknowledge how its investments will help or hinder the state's 2030 mandate. This is a major oversight; most of the stakeholder organizations for the STIP, including the Division of Planning, RIPTA, and RIDOT, sit on the Executive Climate Change Coordinating Council (EC4) that is in charge of developing the compliance plan for the Act On Climate.

We recommend the STIP be amended to include a full analysis of how each project contributes to statewide greenhouse gas emissions.

The transportation infrastructure projects that Rhode Island invests in will influence emissions for decades to come. Some investments, such as projects to expand safe cycling routes, will exert downward pressure on emissions by enabling more Rhode Islanders to travel by bike instead of by car. Other investments, such as highway lane expansions, will encourage more car travel and increase vehicle-miles-travelled in the long term, which will increase transportation emissions.

We support the STIP's emphasis on maintaining a good state of repair for roads and bridges. However, the STIP should calculate and report the greenhouse gas emissions impact of each proposed *expansion* project (such as the \$205 million widening of I-95 northbound) to make sure investments are consistent with the Act On Climate goal while the EC4 develops its strategy for decarbonization. Projects that reduce or eliminate emissions must be prioritized over projects that are likely to increase emissions if the state is to remain in compliance with the Act On Climate. We recommend the STIP analyze both short term (2030) and long-term (2040 and 2050) impacts of all projects.

We also note that STIP project #5204 gives RIDOT authority to "reconfigure" the Kennedy Plaza bus hub - meaning to break up the hub, without a suitable alternative, and disperse the buses, thus making the system more confusing and less convenient for existing and future riders. Riders, planners, environmentalists, community groups, civil rights activists, and the Providence City Council have expressed concern about the impact of bus hub breakup. We believe this project would have a negative impact on transit ridership, and subsequently increase vehicle-miles-travelled, and should be reviewed in light of the Act On Climate mandate.

Prepare for more investments in active mobility, transit, and electric vehicles.

The EC4 has until December 31, 2022, to create a decarbonization plan for Rhode Island according to the law. It would be counterproductive and perhaps impossible to meet the 2030 goal if the current draft of the STIP is executed. We support a doubling of the current budget for active mobility, from \$54 million to \$108 million in the fiscally constrained period of FFY 2022-2025, in line with the state's Bicycle Mobility Plan. This small reallocation would bring the total to 3.6% of the STIP budget during this period and would reflect a clear commitment to the goals of the Act On Climate by the state agencies involved.

As the EC4 works on developing an implementation plan for the Act On Climate, we expect to see the next STIP consider improvements to the electric vehicle charging network, which is absent from the 2022-2031 budget. We also support a full implementation of the Transit Master Plan, which would cost \$54 to \$194 million annually to execute.

Implement a more robust methodology for the Transportation Equity Benefit Analysis.

In section 5 of the STIP, the Transportation Equity Benefit Analysis (TEBA) assesses the distribution of transportation investments in select population groups, including areas predominantly populated by low-income people, people of color, people with disabilities, or households with children. We commend the STIP for considering equity and for its work

in mapping vulnerable population groups. However, we find the TEBA methodology to be flawed because the allocation of investment dollars is the sole factor analyzed in determining equity. TEBA does not consider whether the investments improve or worsen air quality, mobility, or greenhouse gas emissions in the studied population groups. The omission of cumulative health impacts in the STIP is problematic because the burden of air pollution is not shared equally among all population groups. Some expensive projects, such as those to expand highways, add new lanes, and add more highway ramps, may end up increasing the exposure gap and increasing health inequities in the populations studied by TEBA.

A complete equity analysis should include information on whether the proposed projects would expand or shrink cumulative exposure to tailpipe pollutants, including NO_x, SO_x, and particulate matter. Projects that are found to increase vehicle tailpipe pollution in communities already overburdened with poor air quality (whether coming from vehicle tailpipes or stationary sources) should be reviewed, deprioritized, or eliminated from the STIP.

We thank you for the opportunity to comment and look forward to working with you to plan for a decarbonized, healthier, and more connected Rhode Island.

Sincerely,

Mal Skowron, Green Energy Consumers Alliance

Patricia Raub, RI Transit Riders

Kathleen Gannon, RI Bicycle Coalition

John Flaherty, GrowSmart Rhode Island

Hank Webster, Acadia Center

Helene Miller, Partnership for Providence Parks

Sue AnderBois, The Nature Conservancy

Paulina Muratore, Union of Concerned Scientists

Meg Curran, Conservation Law Foundation