



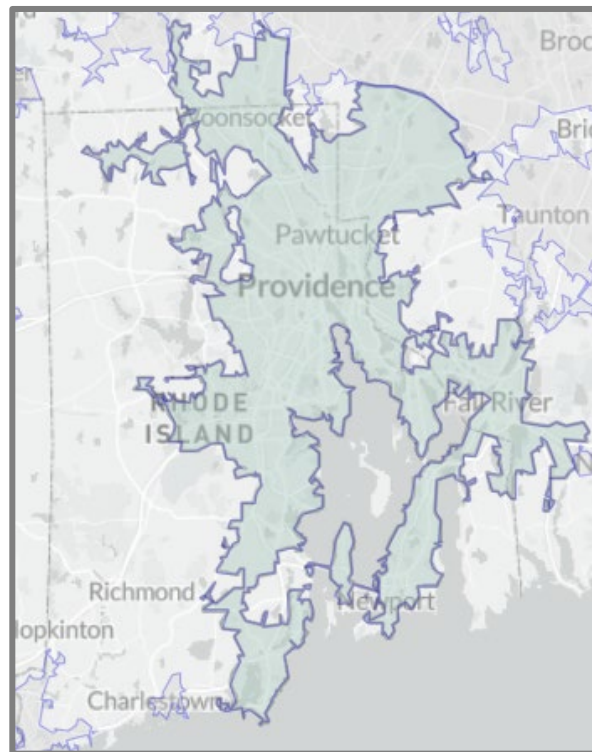
U.S. Department  
of Transportation

# Transportation Management Area Planning Certification Review

Federal Highway  
Administration

Federal Transit  
Administration

## Providence, Rhode Island Transportation Management Area



**Final Report**

**April 2022**





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## 1.0 EXECUTIVE SUMMARY

The Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) conducted the certification review of the transportation planning process for the Providence, Rhode Island - Massachusetts urbanized area through a series of virtual meetings held on February 8, 9, and 10, 2022 in lieu of an on-site meeting. FHWA and FTA are required to jointly review and evaluate the transportation planning process for each urbanized area over 200,000 in population at least every four years to determine if the process meets the Federal planning requirements.

### 1.1 Summary of Current Findings

As a result of this review, FHWA and FTA are certifying the transportation planning process conducted by Rhode Island Department of Transportation (RIDOT), the State Planning Council (SPC) - the Metropolitan Planning Organization (MPO) for the Providence urbanized area, and the Rhode Island Public Transit Authority (RIPTA). There are also recommendations in this report that warrant close attention and follow-up, as well as areas the MPO is performing very well in that are to be commended.

Details of the certification findings for each of the below items are contained in this report. A summary of recommendations is shown in the below tables.

Review Area	Recommendation
1. MPO Structure and Agreements	The membership and processes used by the SPC have changed since the <i>Rules and Standards of the State Planning Council</i> were last updated in March 2017. This document should be revisited to ensure it aligns with changes made, and the MPO should consider adopting a regular cycle to revisit the rules and standards.
2. MPO Structure and Agreements	The MPO should look for opportunities to strengthen outreach to smaller, and especially rural, communities. This could take the form of regular, annual meetings or other forums that engage these communities into the planning process.
3. Financial Planning	The Implementation section of the MTP should clearly identify costs associated with projects selected for the fiscally constrained out-years of the plan. The costs associated with the projects implemented within the MPO's identified time bands (Next 5 years, Future Projects, and Regionally Significant projects) should be included within this section, and it should be clear what projects are part of the financial constraint and which are illustrative.



Review Area	Recommendation
4. Financial Planning	Independent estimates of specific highway and transit projects (found in Appendix E: Project List) are made on a project-by-project basis and include contingency and inflationary factors. This process of how independent estimates are made should be described within planning documents, specifically the MTP and TIP. To enhance financial planning, better manage fiscal constraint and assist in the TIP amendment process, the MPO is encouraged to advance a cost estimating platform into eSTIP for the next project solicitation.
5. Financial Planning	The SPC and RIDOT utilize the programming of Advance Construction (AC) funds as a cash flow management technique. It would be beneficial for the MPO to document the procedures for how the use of AC projects is listed and documented in the TIP. See <a href="https://www.fhwa.dot.gov/ipd/finance/resources/federal_aid/">https://www.fhwa.dot.gov/ipd/finance/resources/federal_aid/</a> for more information on innovative financing.
6. Metropolitan Transportation Plan	The MTP's appendices and supplemental materials should be organized and outlined in an efficient and clear way.
7. Metropolitan Transportation Plan	The MPO should develop a Virtual Public Involvement strategy and implementation plan as part of the Public Participation Plan to be utilized and incorporated into the MTP.
8. Transportation Improvement Program	TIP amendments should clearly distinguish between the revisions that are being proposed to the fiscally constrained first four years and changes being made to the outyears. A reviewer should easily be able to identify if a new project or funding is being added to the first four years, to the outer six years, or if it is being moved between the fiscally constrained and illustrative periods.
9. Transportation Improvement Program	The online TIP application (eSTIP) shows great promise and opportunity, assisting sponsors in applying for funding, assisting with project selection, and aiding in TIP management. It is recommended that, understanding the number of layers that will be included in eSTIP, the number of project sponsors and the varying level of sponsor resources to complete an online application, the SPC and RIDOT conduct a series of information and training sessions prior to the next project solicitation. To complement this effort the MPO is encouraged to prepare training materials / manuals.



<b>Review Area</b>	<b>Recommendation</b>
10. Transportation Improvement Program	With extensive eSTIP applications anticipated in the future, and in an effort to enhance transparency and monitor progress, the planning partners should develop a structured plan and timeline for incorporating or completing different aspects / layers of eSTIP. A number of eSTIP goals and interests were discussed during the on-site visit (e.g. coordination with RIDEM, building a cost estimating tool, assisting with TIP amendments); however, the SPC and RIDOT are encouraged to prioritize these efforts and engage stakeholders during the development of additional eSTIP capabilities.
11. Transportation Improvement Program	The MPO should ensure that all project descriptions in the TIP provide a meaningful level of detail and sufficient information to fully meet the requirements of 23 CFR 450.326(g).
12. Unified Planning Work Program	As RIDSP considers updating the overall structure of the UPWP it is recommended that duplicate information, not directly related to the UPWP, be referenced by source or removed. RIDSP may also want to consider if activities not directly related to the transportation planning program should be removed from the UPWP or referenced in an appendix.
13. Unified Planning Work Program	It is recommended that RIDSP consider revising the next UPWP to enhance a few areas - specifically schedules, partner agencies, and staff resources. Providing a more uniform schedule framework throughout the document could assist in resource planning, possibly developing schedule graphics by quarter for each activity. Also, further defining partners or other agencies involved in a specific UPWP activity will ensure an optimal continuing, cooperative, and comprehensive (3-C) transportation planning process. RIDSP may also want to consider making the UPWP staff resources more general, grouping employees by title instead of by name.
14. Public Participation	The RIDSP should ensure that the effectiveness of the PPP is evaluated on a regular basis and that the evaluation process is transparently coordinated with stakeholders.



Review Area	Recommendation
15. Public Participation	While the planning partners have taken a multi-faceted approach to public engagement in their respective areas of responsibility, opportunities to enhance early outreach and education, processes for incorporation of comments received, and additional public and stakeholder outreach and engagement opportunities should be evaluated. The MPO should work to engage neighborhood organizations in the planning process as well.
16. Civil Rights	<b>LEP:</b> It is recommended that the MPO explore opportunities to provide summary documents of the MPO's key documents in all Safe Harbor languages. The MPO must not solely rely on Google Translate plug-in on its website, as this tool is not an effective translation method.
17. Civil Rights	<b>ADA:</b> The MPO will need to coordinate with RIDOT to develop a municipal ADA assessment, for which a summary of the results should be sent to FHWA/FTA annually.
18. Civil Rights	<b>ADA:</b> The MPO should continue to assess how it communicates with people with disabilities. Alternative methods of communication such as TTY (Teletypewriter), TDD (Telecommunication Device for the Deaf), and relay services that will allow individuals with hearing-impairment to communicate through the telephone to receive information from the MPO. In addition to plain text documents RIDSP makes available to the visually impaired, large print, braille and electronic information must be made available upon request for persons with visual disabilities, to meet compliance with Section 508.
19. Transportation Safety and Security	The Federal Review Team recommends further integration of safety planning between RIPTA and RIDOT, doing so would support a more holistic approach to safety and may identify areas that have a common safety interest.





Review Area	Recommendation
20. Freight Planning	Understanding that freight is and will be a growing source of congestion in the State, the RIDSP should provide opportunities for freight providers and stakeholders to participate in and solicit input into the transportation planning process. The PPP identifies engagement by these freight stakeholders in the MTP process, however there are no specific references in the TIP section and there is no section in the PPP for CMP as a major transportation document. In the next update of the Public Participation Plan, freight shippers and providers of freight transportation services should be included in the public coordination and outreach for the TIP. The PPP should also include a section related to the CMP, ensuring that freight stakeholders are engaged in the process.
21. Performance Management	The next MTP update should include a system performance report that summarizes the relevant information in an easily digestible format. The appendices could continue to hold the detailed background information.
22. Performance Management	The MPO should use its existing Transportation Performance Management website to better communicate the performance targets and progress that is being made in Rhode Island. This may be accomplished by directly providing targets and performance data for the FHWA targets, and the MPO may also consider if its locally identified performance measures are also important to share via the site.
23. Congestion Management Process / Management and Operations	<b>CMP:</b> The CMP states the plan should be updated in conjunction with the State's MTP and that annual reports be generated, which will monitor the status of on-going congestion relief projects and updating performance measures with data from the prior year. Given new funding sources and the resulting acceleration of project deployment, it is recommended RIDOT and RIDSP consider looking at the overall congestion management 'process' during the annual report preparation to assess how it is working and if adjustments need to be made.
24. Congestion Management Process / Management and Operations	<b>M&amp;O:</b> RIDOT should work to complete core ITS planning documents in a timely manner, completing them by the end of 2022. These documents and the planning process will further ensure stakeholder engagement and consistency with the national ITS architecture and 23 CFR Part 940. Transparent documentation should be included on the RIDOT or other appropriate websites.



Review Area	Recommendation
25. Congestion Management Process / Management and Operations	<b>M&amp;O:</b> RIDOT should ensure any ITS projects follow a <a href="#">system engineering analysis</a> .
26. Environmental Mitigation and Resiliency	It would be beneficial, and also assist in transparency, for the MPO to demonstrate how environmental efforts factor into the transportation decision-making process.

A summary of commendations is shown in the below table.

Review Area	Commendation
1. Transportation Safety and Security	The planning partners are commended for the degree of demonstrated teamwork in the State’s development of its annual safety performance targets.
2. Freight Planning	The RIDSP is commended for developing a multi-pronged approach to engaging stakeholders and driving freight planning forward within the state. The municipal freight scans, the development of the Port of Providence Truck Count and Assessment Study, the training academy for planners, and continued engagement of the Freight Advisory Committee continue to highlight the MPO’s investment and commitment to freight planning.
3. Congestion Management Process / Management and Operations	<b>CMP:</b> The RIDSP and RIDOT are commended for their approach and application of the CMP. RIDSP and RIDOT’s commitment to improving congestion and advancing congestion mitigation strategies are evident in their planning documents and project examples. To further institutionalize the use of the CMP as an effective tool to understand and mitigate sources of congestion in RI, RIDOT and RIDSP are encouraged to continuing moving forward with items listed in the Congestion Management Action plan.
4. Congestion Management Process / Management and Operations	<b>M&amp;O:</b> The State’s TIM program is recognized as the Nation’s leader in supplying TIM training. Developing a virtual alternative will ensure the program continues to be successful.
5. Environmental Mitigation and Resiliency	Both RIDOT and the MPO have an extensive amount of environmental resources that are an exemplary example of prioritizing environmental concerns.



## 2.0 INTRODUCTION

### 2.1 Background

Pursuant to 23 U.S.C. 134(k) and 49 U.S.C. 5303(k), the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) must jointly certify the metropolitan transportation planning process in Transportation Management Areas (TMAs) at least every four years. A TMA is an urbanized area, as defined by the U.S. Census Bureau, with a population of over 200,000. In general, the reviews consist of three primary activities: a site visit, a review of planning products (in advance of and during the site visit), and preparation of a Certification Review Report that summarizes the review and offers findings. The reviews focus on compliance with Federal regulations, challenges, successes, and experiences of the cooperative relationship between the Metropolitan Planning Organization(s) (MPO), the State Department(s) of Transportation (DOT), and public transportation operator(s) in the conduct of the metropolitan transportation planning process. Joint FTA/FHWA Certification Review guidelines provide agency field reviewers with latitude and flexibility to tailor the review to reflect regional issues and needs. As a consequence, the scope and depth of the Certification Review reports will vary significantly.

The Certification Review process is only one of several methods used to assess the quality of a regional metropolitan transportation planning process, compliance with applicable statutes and regulations, and the level and type of technical assistance needed to enhance the effectiveness of the planning process. Other activities provide opportunities for this type of review and comment, including Unified Planning Work Program (UPWP) approval, the Metropolitan Transportation Plan (MTP), metropolitan and statewide Transportation Improvement Program (TIP) findings, Air Quality (AQ) conformity determinations (in nonattainment and maintenance areas), as well as a range of other formal and less formal contact which provides both FHWA and FTA an opportunity to comment on the planning process. The results of these other processes are considered in the Certification Review process. While the Certification Review report itself may not fully document those many intermediate and ongoing checkpoints, the “findings” of the Certification Review are, in fact, based upon the cumulative findings of the entire review effort.

The review process is individually tailored to focus on topics of significance in each metropolitan planning area. Federal reviewers prepare Certification Reports to document the results of the review process. The reports and final actions are the joint responsibility of the appropriate FHWA and FTA field offices, and their content will vary to reflect the planning process reviewed.



## 2.2 Purpose and Objective

Since the enactment of the Intermodal Surface Transportation Efficiency Act (ISTEA) of 1991, the FHWA and FTA are required to jointly review and evaluate the transportation planning process in all urbanized areas over 200,000 population to determine if the process meets the Federal planning requirements in 23 U.S.C. 134, 49 U.S.C. 5303, and 23 CFR 450. The Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU), extended the minimum allowable frequency of certification reviews to at least every four years.

The State Planning Council (SPC) is the designated MPO for the Providence urbanized area. There are small areas of Massachusetts that include portions of the Providence urbanized area as well which are served by other MPOs. The Rhode Island Department of Transportation (RIDOT) is the responsible State agency and Rhode Island Public Transit Authority (RIPTA) is the primary public transportation operator within the TMA.

Certification of the planning process is a prerequisite to the approval of Federal funding for transportation projects in such areas. The certification review is also an opportunity to provide assistance on new programs and to enhance the ability of the metropolitan transportation planning process to provide decision-makers with the knowledge they need to make well-informed capital and operating investment decisions.



## 3.0 SCOPE AND METHODOLOGY

### 3.1 Review Process

Participants in the review included representatives of FHWA, FTA, RIDOT, RIPTA, MPO staff and other regional stakeholders. A full list of participants is included in Appendix A, along with copies of the agendas for virtual meetings which were held February 8, 9, and 10, 2022. Opportunities for public comment were provided via virtual meetings held on February 10 and February 17, 2022 and input from MPO members and Transportation Advisory Committee (TAC) was also solicited. Written comments were also accepted through email, regular mail submittals, and an online public comment intake form.

A desk audit of current documents and correspondence was completed prior to the virtual meetings. In addition to the formal review, routine oversight mechanisms provide a major source of information upon which to base the certification findings.

The certification review covers the transportation planning process conducted cooperatively by the MPO, State, and public transportation operator. Background information, current status, and findings are summarized in the body of the report for key topic areas. Findings may include commendations, recommendations, or corrective actions. *Commendations* describe processes and products that are considered notable and identified as best practices. *Recommendations* identify steps that should be implemented to improve processes and planning products that already meet minimum federal requirements. *Corrective actions* describe items that do not meet the requirements of the transportation statute and regulations, along with the actions that must be taken to attain compliance. Failure to address a corrective action may result in a more restrictive certification or the withholding of federal funds. While many facets of the planning process were included in the desk audit, this report focuses on areas with notable findings. All subject areas not included in the report were found to be compliant with federal regulations.

### 3.2 Documents Reviewed

A number of documents, agreements, and materials (e.g. RIDSP website, project solicitation materials) were consulted and assessed for conformity with federal regulations. The following list summarizes a few of the key MPO documents that were reviewed and considered during this certification review.

- MPO Agreements and By-Laws
- FFY 2022 Unified Planning Work Program



- MTP, Moving Forward RI 2040 (December 2020)
- FFY 2022-2031 TIP and Associated Documents (August 2021)
- Public Participation Plan (Revised September 2021)
- Title VI Implementation Plan (October 2020)
- Limited English Proficiency Plan (September 2021)
- Congestion Management Plan (2020) and Annual Report (2021)
- Statewide Bicycle Mobility Plan (December 2020)
- Rhode Island Transit Master Plan (December 2020)
- ITS Deployments for Freight Specific Applications – Technical Paper (June 2020)



## 4.0 PROGRAM REVIEW

### 4.1 MPO Structure and Agreements

#### 4.1.1 Regulatory Basis

23 U.S.C. 134(d) and 23 CFR 450.314(a) state the MPO, the State, and the public transportation operator shall cooperatively determine their mutual responsibilities in carrying out the metropolitan transportation planning process. These responsibilities shall be clearly identified in written agreements among the MPO, the State, and the public transportation operator serving the metropolitan planning area (MPA).

As it relates to MPO composition, according to 23 CFR 450.310(d), the MPO Policy Board shall consist of (a) local elected officials, (b) officials of public agencies that administer or operate major modes of transportation within the metropolitan area, including representation by providers of public transportation, (c) appropriate State transportation officials.

#### 4.1.2 Current Status

A Memorandum of Agreement (MOA) documenting the roles and responsibilities of the Rhode Island State Planning Council (SPC), Rhode Island Department of Statewide Planning (RIDSP), the Rhode Island Department of Transportation (RIDOT), and the Rhode Island Public Transit Authority (RIPTA) in carrying out the transportation planning program was executed in June 2020. The MOA includes a provision that it will be reviewed every four years.

The SPC is the single MPO covering the entire state of Rhode Island, designated by the governor of Rhode Island in 1974, and reaffirmed in 1992. SPC membership is established in state law (R.I. Gen. Laws § 42-11-10), currently with 27 members, representing a range of interests. Each member has one vote and a simple majority carries for the SPC. Some of the seats on the SPC are statutorily designated while others are filled by appointment of the Governor. There are no set terms for these seats. The RIDSP serves as staff to the MPO and its subcommittees.

State law also establishes three advisory committees: a Technical Committee, a Transportation Advisory Committee (TAC), and a RI Geographic Information System (RIGIS) Committee. While not required in state law, there is also a Freight Advisory Committee. Additional details on the operations of the SPC and its subcommittees are laid out in the *Rules and Standards of the State Planning Council*, prepared in 2017.

The TAC assists in obtaining public input on transportation planning initiatives and assists the SPC in acting in its role as the MPO. The core TAC membership is identified in the *Rules and*



*Standards*, but the membership is subject to change and expansion by the SPC. TAC members are appointed for three-year terms by the SPC. RIDSP has a form on its website that allows anyone interested in joining the TAC or another subcommittee to submit their name or organization for future consideration when openings are to be filled.

A handbook of the State Planning Council / Metropolitan Planning Organization summarizing the statewide planning program, the MPO, committees that support the MPO and duties of the RIDSP was prepared in October 2021, to assist SPC in understanding the mission and function of the council as the MPO. When new members join the SPC or one of its subcommittees, RIDSP staff reach out to establish a one-on-one contact with the member and to make themselves available to answer any questions. For members that are municipal elected officials, the staff also seeks to stay in contact with the municipality's planner to improve coordination. Of 39 municipalities in Rhode Island, 4 municipalities have direct seats on the MPO (along with two seats representing the Rhode Island League of Cities and Towns). RIDSP has recently provided training for local planners to educate them on MPO processes and bridge the gap between regional and local planning.

#### **4.1.3 Findings**

The roles and responsibilities of the parties involved in the metropolitan transportation planning process are well documented in the MOA and supporting documents, and MPO composition meets federal requirements.

**Recommendation:** The membership and processes used by the SPC have changed since the *Rules and Standards of the State Planning Council* were last updated in March 2017. This document should be revisited to ensure it aligns with changes made, and the MPO should consider adopting a regular cycle to revisit the rules and standards.

**Recommendation:** The MPO should look for opportunities to strengthen outreach to smaller, and especially rural, communities. This could take the form of regular, annual meetings or other forums that engage these communities into the planning process.

## **4.2 Financial Planning**

### **4.2.1 Regulatory Basis**

Financial planning, is a systematic approach where a State, Metropolitan Planning Organization (MPO), or transit operator manages its financial resources utilizing financial tools to determine how to fund the maintenance and operation of, as well as capital improvements to its transportation system over both the short-term (4-year TIP) and long-term (20-year MTP). The





requirements for financial plans are contained in 23 CFR 450.324(f)(11) for the Metropolitan Transportation Plan (MTP) and 23 CFR 450.326(e-n), for the Transportation Improvement Program (TIP). Separate financial plans demonstrate how the adopted MTP and TIP can be implemented.

The financial requirements related to the MTP include the following, at a minimum:

- Revenue estimates are cooperatively developed by the State, the MPO, and public transportation operators.
- Revenue estimates include public and private sources that are committed, available, or reasonably expected to be available within the timeframe anticipated for implementation of the project.
- Revenue estimates may include recommendations for new funding sources, which should be supported by identified strategies for securing their availability.
- System-level estimates of operation and maintenance costs for Federally-supported facilities and services are taken into account to determine resources remaining available for capital expenditure.
- Cost and revenue estimates incorporate inflation rates reflecting year of expenditure (YOE) dollars.
- The quality of cost estimates is important in the MTP (and TIP). Cost estimates should be reviewed and the process and methods (and any assumptions) for determining costs should be documented.
- Cost estimates in the MTP should be reviewed and periodically updated, at least as frequently as each MTP update.

The financial requirements related to the TIP include the following, at a minimum:

- Demonstrate and maintain financial constraint by year.
- Identify projects to be funded with current and available revenues.
- Identify estimated total project cost, which may extend beyond the four years of the TIP.
- System-level estimates of operation and maintenance costs for Federally supported facilities and services are taken into account when estimating resources remaining available for capital expenditure.
- Cost and revenue estimates incorporate inflation rates to reflect YOE dollars.
- The quality of cost estimates is important in the TIP (and MTP). Cost estimates should be reviewed and the process and methods (and any assumptions) for determining costs should be documented.
- Cost estimates in the TIP should be reviewed and periodically updated, at least as frequently as each TIP update.



- Only projects or phases of projects if full funding can reasonably be expected to be available for the project within the time period anticipated for completion of the project.

#### **4.2.2 Current Status**

An agreement between RIDOT, RIDSP, the SPC and RIPTA, executed in June 2020, outlines responsibilities for developing financial information that support the MTP and the TIP.

##### Metropolitan Transportation Plan

*Moving Forward RI 2040*, Rhode Island's MTP, was adopted in December 2020. The MTP outlines current funding, future investments and the fiscally constrained approach. Appendices E, F, M, and R provide supporting cost and financial documentation.

The MTP illustrates an estimate of revenue over the duration of the 20-year MTP planning horizon in Appendix F: Revenue Projections. The revenues match up to the revenue shown in the expenditure table located in Appendix R: Fiscal Constraint Table. The investment forecast is based on historical spending levels, as documented in historical TIP documents, including the FFY 2017-2025 TIP and the FFY 2018-2027 TIP. The forecast spending, by program, is based on programming estimates for transportation infrastructure and the reasonably expected revenues available.

The MTP's Appendix M: 20-year Transit Investment Scenario Report describes alternate spending scenarios and the impact on current transit operations, asset management, and expansion. Appendix M was used to inform the anticipated outcomes of forecast expenditures described in the MTP and set reasonable expectations for what can be achieved with current spending levels.

Historical inflation rates as well as the continuing rise in construction costs is described in the "Conclusions and Trends to Consider" section of the MTP's Appendix F: Revenue Projects. Independent estimates of specific highway and transit projects (see Appendix E: Project List) are made on a project-by-project basis and includes contingency and inflationary factors. The MPO noted that the FFY 2022-2031 TIP most accurately accounts for anticipated project construction costs by projecting FHWA and FTA formula funds based on rules and principles identified in Section 1 of the TIP, Fiscal Constraint.

##### Transportation Improvement Program

RI's Federal Fiscal Year (FFY) 2022-2031 TIP covers the required four fiscally constrained years (FFY 2022-2025) and outlines projects through FFY 2026-2031 that are advancing through development toward implementation. The Metropolitan Planning Organization (MPO) in RI



covers the entire state and therefore the Statewide Transportation Improvement Program (STIP) is the same document as the metropolitan Transportation Improvement Program (TIP) document, therefore the terms STIP and TIP are used interchangeably. The TIP is updated no less than every four years. Under an MOA between RIDOT, RIPTA, RISPC and RIDSP, RIDOT prepares a proposed breakdown of funding by category for review and approval by the TAC and SPC and develops financial plan sources (including public and private funding) that demonstrates how the TIP can be implemented. Under this same agreement RIPTA identifies projects for inclusion in the TIP and develops financial plan sources that demonstrate how the TIP can be implemented.

Within the TIP, funding sources and funding uses by year are outlined for RIDOT and RIPTA demonstrating fiscal constraint (Tables 1-5 and 1-6).

Project costs are refined in the TIP as they advance in the design and/or construction phases. These changes in project costs are reflected and documented in TIP revisions. Project estimates are based on construction costs according to historic spending on similar treatments, soft costs based on scale, and miscellaneous costs typically factored into roadway construction. RIDOT expressed their interest in building a cost estimating tool into the eSTIP program in the future, assisting project sponsors in estimating project costs.

#### 4.2.3 Findings

**Recommendation:** The Implementation section of the MTP should clearly identify costs associated with projects selected for the fiscally constrained out-years of the plan. The costs associated with the projects implemented within the MPO's identified time bands (Next 5 years, Future Projects, and Regionally Significant projects) should be included within this section, and it should be clear what projects are part of the financial constraint and which are illustrative.

**Recommendation:** Independent estimates of specific highway and transit projects (found in Appendix E: Project List) are made on a project-by-project basis and include contingency and inflationary factors. This process of how independent estimates are made should be described within planning documents, specifically the MTP and TIP. To enhance financial planning, better manage fiscal constraint and assist in the TIP amendment process, the MPO is encouraged to advance a cost estimating platform into eSTIP for the next project solicitation.

**Recommendation:** The SPC and RIDOT utilize the programming of Advance Construction (AC) funds as a cash flow management technique. It would be beneficial for the MPO to document the procedures for how the use of AC projects is listed and documented in the TIP. See [https://www.fhwa.dot.gov/ipd/finance/resources/federal\\_aid/](https://www.fhwa.dot.gov/ipd/finance/resources/federal_aid/) for more information on innovative financing.



## 4.3 Metropolitan Transportation Plan

### 4.3.1 Regulatory Basis

23 U.S.C. 134(c), (h) & (i) and 23 CFR 450.324 set forth requirements for the development and content of the Metropolitan Transportation Plan (MTP). Among the requirements are that the MTP address at least a 20 year planning horizon and that it includes both long and short range strategies that lead to the development of an integrated and multi-modal system to facilitate the safe and efficient movement of people and goods in addressing current and future transportation demand.

The MTP is required to provide a continuing, cooperative, and comprehensive multimodal transportation planning process. The plan needs to consider all applicable issues related to the transportation systems development, land use, employment, economic development, natural environment, and housing and community development.

23 CFR 450.324(c) requires the MPO to review and update the MTP at least every four years in air quality nonattainment and maintenance areas and at least every 5 years in attainment areas to reflect current and forecasted transportation, population, land use, employment, congestion, and economic conditions and trends.

Under 23 CFR 450.324(f), the MTP is required, at a minimum, to consider the following:

- Projected transportation demand
- Existing and proposed transportation facilities
- Operational and management strategies
- Congestion management process
- Capital investment and strategies to preserve transportation infrastructure and provide for multimodal capacity
- Design concept and design scope descriptions of proposed transportation facilities
- Potential environmental mitigation activities
- Pedestrian walkway and bicycle transportation facilities
- Transportation and transit enhancements
- A financial plan

### 4.3.2 Current Status

*Moving Forward RI 2040*, the regional MTP which, due to the alignment of the MPA and state boundaries, also serves as the State of Rhode Island's long range transportation plan (LRTP), was adopted in December 2020. Under the umbrella of *Moving Forward RI 2040*, the SPC also



adopted the Transit Master Plan (TMP), Bicycle Mobility Plan (BMP), and Congestion Management Plan/Process (CMP). Throughout the development of the MTP there was coordination and collaboration with representatives from RIPTA, RIDOT, RI Department of Health, and RI Department of Environmental Management. The previous 2035 MTP was adopted in December 2012. Understanding the requirement of an update every five years, the MPO adopted an interim 2017-2037 MTP using the 2035 plan as its basis while it worked on the adoption of the 2040 plan.

The 2040 MTP is a condensed 51-page document which is significantly shorter than the 2035 MTP. This structure provides a more approachable way for the public and partner agencies to engage with and understand the MPO transportation planning process, federal planning requirements, and regional and state-wide priorities that are included in the MTP. Although the MTP is shorter in length, there are 18 appendices (A-R) that provide the supplemental information for topics including financing, environment, project list, public involvement, and more. The Federal Review Team often found it challenging to navigate between the MTP and the multiple appendices to piece together answers to questions and other vital information. Related, there are no clear titles or document descriptions for each appendix documents or reference links within the MTP to clearly connect the reader to the accurate corresponding appendix document. There are instances where the appendix link titles on the MTP webpage do not match up with the actual document titles. The current organization creates the opportunity for confusion and disconnection of the long-range plan and the federal requirements.

The public participation efforts for the MTP and corresponding various modal plans (TMP, BMP, and CMP) were completed on different schedules within the overall MTP timeframe. There were different working groups, workshops, and public outreach opportunities on alternating schedules for each of the plans. Ultimately, there was a combined public comment period for all plan components during the MTP Plan adoption from October to December 2020.

The *MTP Public Comment and Hearing Report – November 2020* references *Appendix H: Public Participation Plan* as the location where “Over 1,300 responses were received and the results summarized” from the Electronic Survey, however the responses are not actually included in Appendix H. Additionally, the Appendix H report is titled the “Public Participation Plan: Long-Range Transportation Plan and Bicycle Mobility Plan” without reference to the TMP and CMP. If there were other outreach efforts specific to the TMP and CMP for incorporation into the larger long-range plan effort, it is not clear.

Neither the MTP nor Appendix H includes reference to Virtual Public Involvement (VPI) as a tool for public engagement. The use of VPI broadens the reach of information to the public and makes participation more convenient and affordable to greater numbers of people. Virtual



tools provide transparency and access to transportation planning activities and decision-making processes that will continue to be an important and vital tool for engagement.

### 4.3.3 Findings

*Moving Forward RI 2040* is a comprehensive package including the MTP document and supplemental appendices that meets the federal regulatory requirements, although not always easy to locate or decipher. Improvements can be made with organization of the supplemental materials, citing data sources, and linking of appendices within the long-range plan document.

Going forward, it is important that the MPO works to avoid, to all extent possible, a situation where there is a lapse of over 5 years for the next MTP adoption.

There should also be attention given to public involvement and increasing opportunities and access for the public and stakeholders to be involved in the transportation planning process through tools such as VPI.

**Recommendation:** The MTP's appendices and supplemental materials should be organized and outlined in an efficient and clear way.

**Recommendation:** The MPO should develop a Virtual Public Involvement strategy and implementation plan as part of the Public Participation Plan to be utilized and incorporated into the MTP.

## 4.4 Transportation Improvement Program

### 4.4.1 Regulatory Basis

23 U.S.C. 134(c), (h) & (j) set forth requirements for the MPO to cooperatively develop a Transportation Improvement Program (TIP). Under 23 CFR 450.326, the TIP must meet the following requirements:

- Must cover at least a four-year horizon and be updated at least every four years.
- Surface transportation projects funded under Title 23 U.S.C. or Title 49 U.S.C., except as noted in the regulations, are required to be included in the TIP.
- List project description, cost, funding source, and identification of the agency responsible for carrying out each project.
- Projects need to be consistent with the adopted MTP.



- Must be fiscally constrained.
- The MPO must provide all interested parties with a reasonable opportunity to comment on the proposed TIP.
- Include a description of the anticipated effect of the TIP toward achieving the performance targets identified in the MTP, linking investment priorities to those targets.
- Established criteria and procedures for amending the TIP

#### **4.5.2 Current Status**

The FFY 2022-2031 TIP was adopted by the SPC in September 2021 and responsibilities for TIP development and maintenance are outlined in the MOA between the SPC, RIDSP, RIDOT, and RIPTA (executed in June 2020 and amended in January 2022). The first four years of the TIP are required to be fiscally constrained, and FHWA and FTA consider any projects included in years 5 through 10 to be illustrative.

RIDSP and RIDOT hosted a Transportation Planning Capacity Building (TPCB) Peer Program in September 2018 focused on ‘Exploring an eSTIP Transition and Improving the Transportation Alternatives Set-Aside Program in Rhode Island’. Key takeaways included: Systems must be in place to support eSTIP, building equity into the TIP process can take many forms, improved processes and technology can help manage municipalities’ expectations, and Agencies must consider how to balance thoroughness with efficiency.

RIDSP has an online TIP map viewer and is continuing to work to develop their online TIP application (eSTIP).

#### **Project Selection and TIP Development**

When funding is available and TIP projects are needed, RIDSP issues a notice about the opportunity to submit transportation project proposals, a guide on how to submit, funding eligibility criteria, and a PDF of the application. Project sponsors are required to hold a public hearing prior to submitting their application. Due to a backlog of projects in the TIP, RIDSP did not issue a project solicitation when the current TIP was developed. RIDSP and RIDOT will be utilizing a component of their eSTIP platform to improve how project applications are submitted and working toward a more data-driven selection process. It is anticipated that this web-based project solicitation framework will be in place prior to the next project solicitation.

RIDSP is in the process of developing new TIP rating criteria which is anticipated to take a number of factors into consideration such as existing rating criteria, data layers developed through the eSTIP platform and ESRI layers, performance metrics, and criteria coming out of the new Bipartisan Infrastructure Law. RIDOT and RIDSP are working to understand how to quantify



and incorporate transportation related emissions reduction / performance measures into the project selection criteria and expressed that the RI Department of Environmental Management (RIDEM) will also be working on how to measure this.

Regionally significant projects are drawn from *Moving Forward RI 2040*, the MTP for Rhode Island which was adopted in December 2020. Section 4 of the TIP documents regionally significant projects (funded, partially funded, and unfunded projects).

Public comments on the draft TIP were accepted over a 30-day public comment period through the online Smart Comment portal, through email and solicited during two public hearings. Over 100 comments were received and comments, along with responses, were compiled and made part of the final TIP documentation. RIDSP, RIDOT and RIPTA addressed public comments applicable to their areas of expertise and noted if recommended changes would be incorporated into the TIP.

### TIP Amendments

Procedures to amend and modify the TIP are outlined in the 2020 MOA between FHWA, FTA, SPC, RIDSP, RIDOT, and RIPTA. The MOA outlines four (4) types of revisions (major amendment, minor amendment, administrative adjustment, no action adjustment). Revisions may affect the fiscally constrained portion of the TIP and/or the outyears.

For major TIP amendments, a minimum thirty (30) day comment period and a public hearing in front of the TAC is required. Following the hearing, the TAC reviews the public hearing report and is asked to make a recommendation to the SPC. The SPC formally acts on the amendment and forwards to the Governor for concurrence and signature and then onto FHWA and FTA for final review and approval. Public notice is provided through a number of sources for minor amendments and requires a ten (10) day public comment period. Public notice is not required for proposed administrative and no action adjustments. Public hearings are not required for minor amendments, administrative adjustment or no action adjustments.

### **4.5.3 Findings**

**Recommendation:** TIP amendments should clearly distinguish between the revisions that are being proposed to the fiscally constrained first four years and changes being made to the outyears. A reviewer should easily be able to identify if a new project or funding is being added to the first four years, to the outer six years, or if it is being moved between the fiscally constrained and illustrative periods.

**Recommendation:** The online TIP application (eSTIP) shows great promise and opportunity, assisting sponsors in applying for funding, assisting with project selection, and aiding in TIP





management. It is recommended that, understanding the number of layers that will be included in eSTIP, the number of project sponsors and the varying level of sponsor resources to complete an online application, the SPC and RIDOT conduct a series of information and training sessions prior to the next project solicitation. To complement this effort the MPO is encouraged to prepare training materials / manuals.

**Recommendation:** With extensive eSTIP applications anticipated in the future, and in an effort to enhance transparency and monitor progress, the planning partners should develop a structured plan and timeline for incorporating or completing different aspects / layers of eSTIP. A number of eSTIP goals and interests were discussed during the on-site visit (e.g. coordination with RIDEM, building a cost estimating tool, assisting with TIP amendments); however, the SPC and RIDOT are encouraged to prioritize these efforts and engage stakeholders during the development of additional eSTIP capabilities.

**Recommendation:** The MPO should ensure that all project descriptions in the TIP provide a meaningful level of detail and sufficient information to fully meet the requirements of 23 CFR 450.326(g).

## 4.5 Transit Planning

### 4.5.1 Regulatory Basis

49 U.S.C. 5303 and 23 U.S.C. 134 require the transportation planning process in metropolitan areas to consider all modes of travel in the development of their plans and programs. Federal regulations in 23 CFR 450.314 state that the MPO in cooperation with the State and operators of publicly owned transit services shall be responsible for carrying out the transportation planning process.

### 4.5.2 Current Status

RIPTA and RIDOT are the primary providers of public transportation in the region. RIPTA provides fixed-route bus and paratransit service throughout the state, and RIDOT contracts with the MBTA to provide commuter rail service. RIPTA and RIDOT have strengthened their collaborative relationship through their close coordination, along with Amtrak and the MBTA, on the construction of the Pawtucket/Central Falls Commuter Rail Station and Bus Hub.

As part of the MTP development, the state's first ever transit master plan, Transit Forward RI, was developed and adopted by the State Planning Council on December 10, 2020. The plan, which included extensive public outreach, provides a long-range vision to enhance mobility and identifies areas of need such as increased frequencies on key routes, dedicated bus lanes, and



greater investments in regional transit hubs located throughout the state. While the transit master plan outlines priority initiatives, such as Develop High Capacity Transit and Improve Access to Transit, it does not detail specific steps to accomplish these priorities, and additional planning efforts are in the works to help guide implementation.

The MPO and RIPTA are advancing multiple planning initiatives including an update to the Coordinated Human Services Transportation Plan, the development of a Fleet Electrification and Growth Plan, and corridor-specific studies.

During the site visit, RIPTA staff commented that the Transit Asset Management Plan has helped improve the agency's standard maintenance practices and they are actively updating their asset inventory to further enhance their asset management program.

### **4.5.3 Findings**

The transportation planning process in Rhode Island is consistent with the Federal requirements for this topic area.

## **4.6 Unified Planning Work Program**

### **4.6.1 Regulatory Basis**

23 CFR 450.308 identifies the requirements for the Unified Planning Work Programs (UPWP) to be prepared in TMAs. 23 CFR 420.111 governs work programs required for the expenditure of FHWA highway planning and research funds.

MPOs are required to develop UPWPs in cooperation with the State and public transit agencies. Elements to be included in the UPWP include:

- Discussion of the planning priorities facing the metropolitan planning area
- Description of all metropolitan transportation planning and transportation-related air quality planning activities anticipated within the following one-to-two-year period, regardless of funding source, indicating:
  - Who will perform the work
  - The schedule for completion of the work
  - The intended products, including all activities funded under Title 23 and the Federal Transit Act.



## 4.6.2 Current Status

RIDSP prepares a yearly UPWP, the latest one covers State Fiscal Year 2022 (July 1, 2021 to June 30, 2022) activities. The UPWP was coordinated with RIDOT and RIPTA, and the draft document was shared with the Transportation Advisory and Technical Advisory Committees prior to adoption by the MPO. The UPWP includes regulatory elements such as deliverables, schedules, and the responsible party performing the work. Quarterly reports are prepared, tracking activity progress and financials.

The UPWP duplicates information that is contained in other documents, such as organizational structure and State Guide Plan details, and could be referenced through document hyperlinks or a sourced reference. The UPWP also includes activities undertaken by the RIDSP that do not use FHWA or FTA funding and are not directly related to transportation (e.g. Activity 15 – Energy Facility Siting Board Review).

Some activities list projects and ‘partner agencies’ which could use a more detailed review. RIDSP may want to consider if there would be a benefit to listing others, such as including RIPTA as a partner agency in the eSTIP narrative listing or the RI Department of Environmental Management (DEM) in efforts related to air quality.

Schedules outlined in the UPWP are not uniform and vary, showing a combination of months, quarters, dates or long narratives. Related to staff resources, individual RIDSP staff are identified specifically by name in the document, as opposed to grouped by title.

RIDSP expressed they anticipate making changes to the structure of the UPWP in future years.

## 4.6.3 Findings

**Recommendation:** As RIDSP considers updating the overall structure of the UPWP it is recommended that duplicate information, not directly related to the UPWP, be referenced by source or removed. RIDSP may also want to consider if activities not directly related to the transportation planning program should be removed from the UPWP or referenced in an appendix.

**Recommendation:** It is recommended that RIDSP consider revising the next UPWP to enhance a few areas - specifically schedules, partner agencies, and staff resources. Providing a more uniform schedule framework throughout the document could assist in resource planning, possibly developing schedule graphics by quarter for each activity. Also, further defining partners or other agencies involved in a specific UPWP activity will ensure an optimal continuing, cooperative, and comprehensive (3-C) transportation planning process. RIDSP may



also want to consider making the UPWP staff resources more general, grouping employees by title instead of by name.

## **4.7 Public Participation**

### **4.7.1 Regulatory Basis**

Section 134 of Title 23 and Section 5303 of Title 49 require a MPO to provide adequate opportunity for the public to participate in and comment on the products and planning processes of the MPO. The requirements for public involvement are detailed in 23 CFR 450.316, which requires the MPO to develop and use a documented participation plan that includes explicit procedures and strategies to include the public and other interested parties in the transportation planning process.

The federal planning regulations further define specific activities to be carried out by the MPO, including making public information available in electronically accessible formats and means; demonstrating explicit consideration and response to public input received during the development of the MTP and the TIP; seeking out and considering the needs of those traditionally underserved, such as low-income and minority households, who may face challenges accessing employment and other services; providing an additional opportunity for public comment, if the final MTP or TIP differs significantly from the version that was made available for public comment by the MPO and raises new material issues that interested parties could not reasonably have foreseen from the public involvement efforts; periodically reviewing the effectiveness of the procedures and strategies contained in the participation plan to ensure a full and open participation process; and consult with agencies and officials responsible for other planning activities within the MPA that are affected by transportation.

### **4.7.2 Current Status**

A new Public Participation Plan (PPP) for the SPC was prepared and adopted in June 2019, and an appendix was added in September 2021 to acknowledge the use of virtual public outreach in light of the COVID-19 pandemic. The RIDSP has employed a wide range of forward-thinking and nontraditional public involvement strategies including crowdsourced maps, social media, radio, pop-up outreach at libraries and farmer's markets, and electronic tablet-based surveys in the field. These techniques were introduced prior to the pandemic and received a commendation in the 2018 federal certification review. The new PPP briefly talks to some of these non-traditional strategies. RIDSP prepares annual evaluation reports as part of its annual Title VI report summarizing publications, reports, meeting attendance and newsletters. The limited feedback received via surveys of meeting attendees is included. It is unclear if these documents evaluate how successful public outreach is, if the program should be modified, or if



improvements are needed, and it is not clear whether the annual report documents are shared with stakeholders and the public.

Prior to COVID-19, RI statutes have limited the options for public meetings to be held virtually. In the past two years, as a result of the pandemic and related emergency orders, some meetings have been held virtually and attendance has increased, suggesting a value for a hybrid of virtual and in-person events in the future.

The RIDSP and RIDOT recently upgraded to Logitech equipment to host virtual meetings. They also use the web-based Smart Comment platform to solicit comments from the public. Staff also participated in a workshop related to graphics that assisted in understanding how to communicate with others in a more effective manner.

As part of this certification review, the Federal Review Team solicited input via multiple avenues. Much of the public and stakeholder input received was related to public involvement. While some agencies and municipalities noted good coordination with the MPO, some commenters voiced concerns that the public and stakeholders do not have sufficient opportunity to participate in and influence decision-making. Many comments were particularly focused on RIDOT project development and selection. Other comments focused on the TAC process, and some felt that the TAC's meetings and business processes do not allow the public and board members to sufficiently engage in a meaningful way. There is a lack of regular outreach to neighborhood-level organizations, and some advocates feel the process is biased against non-highway modes. Although the MPO and its planning partners have techniques in place to outreach to and engage the public, enhancements in the transportation decision-making process could be beneficial. A summary of comments received is in Appendix C.

#### 4.7.3 Findings

**Recommendation:** The RIDSP should ensure that the effectiveness of the PPP is evaluated on a regular basis and that the evaluation process is transparently coordinated with stakeholders.

**Recommendation:** While the planning partners have taken a multi-faceted approach to public engagement in their respective areas of responsibility, opportunities to enhance early outreach and education, processes for incorporation of comments received, and additional public and stakeholder outreach and engagement opportunities should be evaluated. The MPO should work to engage neighborhood organizations in the planning process as well.



## 4.8 Civil Rights (Title VI, EJ, LEP, ADA)

### 4.8.1 Regulatory Basis

Title VI of the Civil Rights Act of 1964, prohibits discrimination based upon race, color, and national origin. Specifically, 42 U.S.C. 2000(d) states that “No person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.” In addition to Title VI, there are other Nondiscrimination statutes that afford legal protection. These statutes include the following: Section 162 (a) of the Federal-Aid Highway Act of 1973 (23 U.S.C. 324), Age Discrimination Act of 1975, and Section 504 of the Rehabilitation Act of 1973/Americans with Disabilities Act (ADA) of 1990. ADA specifies that all programs, services, and activities undertaken by public entities regardless of the source of the funding, are prohibited from discrimination based on solely on the basis of an individual’s disability.

Executive Order #12898 (Environmental Justice) directs federal agencies to develop strategies to address disproportionately high and adverse human health or environmental effects of their programs on minority and low-income populations. In compliance with this Executive Order, USDOT and FHWA issued orders to establish policies and procedures for addressing environmental justice in minority and low-income populations. The planning regulations, at 23 CFR 450.316(a)(1)(vii), require that the needs of those “traditionally underserved” by existing transportation systems, such as low-income and/or minority households, be sought out and considered. FTA issued Circular 4703.1 in 2012, which provides guidance to FTA recipients on how to fully engage environmental justice populations in the public transportation decision-making process, how to measure impacts and minimize or mitigate these impacts.

Executive Order # 13166 (Limited-English-Proficiency) requires agencies to ensure that limited English proficiency persons are able to meaningfully access the services provided consistent with and without unduly burdening the fundamental mission of each federal agency.

Under the ADA (28 CFR § 35.105) and Section 504 (49 CFR § 27.11), public entities must ensure that all programs, activities, and services are examined to identify barriers to access for persons with disabilities. Every State and municipality is required by Section 504 and by the ADA, to have completed a self-evaluation and an ADA transition plan. The self-evaluation is an inventory of an entity’s facilities (e.g. sidewalks, curb ramps, detectable warnings) that identifies barriers in policies (e.g., public meetings in inaccessible locations), programs (e.g., sidewalks and curb ramps— both considered to be “programs”—that are inaccessible to persons with disabilities, or, missing where they should have been constructed) and other activities and services that prevent access for persons with disabilities.



An ADA transition plan is the document that identifies the steps necessary to complete the changes identified in the entity's self-evaluation to make its programs, activities, and services accessible; it describes in detail the actions the public entity will take to make facilities accessible and a prioritized schedule for making the improvements. All public entities with 50 or more employees (agency-wide) are required to develop a transition plan. Whereas agencies with less than 50 employees must develop a "Program Access Plan," that describes how it will address non-compliant facilities.

Executive Order (EO) 14008, "Tackling the Climate Crisis at Home and Abroad" created a government-wide "Justice40 Initiative" that aims to deliver 40 percent of the overall benefits of relevant federal investments to disadvantaged communities. The US Department of Transportation (USDOT) will develop a methodology to identify disadvantaged communities and benefits for Justice40-covered programs, that will be consistent with guidance from the Office of Management and Budget (OMB) and relevant statutory authorities.

The Justice40 Initiative is also aligned with the goals of EO 13985, "Advancing Racial Equity and Support for Underserved Communities Through the Federal Government," and will be implemented as part of the USDOT's broader equity agenda.

#### **4.8.2 Current Status**

##### Title VI

The Federal Review Team reviewed the MPO's Title VI Report and found it to be consistent with Federal requirements. The document summarizes several of the MPO's required documents, including the TIP, MTP, UPWP, and the PPP. It discusses the MPO's efforts on LEP, EJ, and their complaint process.

##### Limited English Proficiency (LEP)

The RIDSP states that its website can be read in 91 languages using the Google Translate plug-in tool. The RIDSP was reminded by the Federal Review Team that Google Translate is not an effective method to provide translation of their website. During the review, it was suggested that the RIDSP should plan to provide a document that informs the public of the role of the MPO which would be translated with qualified translators in all Safe Harbor languages identified in the LEP. This would be a document of what the MPO does, such as a simple explanation of the TIP, MTP and PPP, as an Executive Summary. It is expected that the MPO would provide a complete translation of the TIP, MTP, PPP or other documents upon request. This should be prominently displayed on the MPO's public notices and website.

##### ADA



The RIDSP stated that staff is trained to answer questions from municipalities concerning the ADA. However, the 2018 certification review had specifically requested that the MPO coordinate with RIDOT to encourage the municipalities to develop ADA transition plans.

The PPP includes a section related to RI's populations of people living with disabilities, referencing that all items posted to the RIDSP website can be made available in plain text documents for the visually impaired and outlines a number of items RIDSP addresses to remove potential barriers to participate (e.g. holding meetings in ADA accessible locations, providing Communication Assisted Real Time Translation (CART) for the blind and assisted listening devices for the deaf and hard of hearing if requested in advance).

#### **4.8.3 Findings**

The MPO's Title VI program is consistent with Federal requirements.

The MPO staff should increase its awareness of the two Executive Orders, [EO 14008](#) and [EO 13985](#), and prepare itself for the rollout by attending webinars and other virtual meetings as they become available.

**Recommendation (LEP):** It is recommended that the MPO explore opportunities to provide summary documents of the MPO's key documents in all Safe Harbor languages. The MPO must not solely rely on Google Translate plug-in on its website, as this tool is not an effective translation method.

**Recommendation (ADA):** The MPO will need to coordinate with RIDOT to develop a municipal ADA assessment, for which a summary of the results should be sent to FHWA/FTA annually.

**Recommendation (ADA):** The MPO should continue to assess how it communicates with people with disabilities. Alternative methods of communication such as TTY (Teletypewriter), TDD (Telecommunication Device for the Deaf), and relay services that will allow individuals with hearing-impairment to communicate through the telephone to receive information from the MPO. In addition to plain text documents RIDSP makes available to the visually impaired, large print, braille and electronic information must be made available upon request for persons with visual disabilities, to meet compliance with Section 508.





## 4.9 Transportation Safety and Security

### 4.9.1 Regulatory Basis

The FAST Act requires MPOs to consider safety and security as two of ten planning factors. As stated in 23 CFR 450.306(b)(2) and (3), the planning process needs to consider and implement projects, strategies, and services that will increase the safety and security of the transportation system for motorized and non-motorized users.

In addition, SAFETEA-LU established a core safety program called the Highway Safety Improvement Program (HSIP) (23 U.S.C. 148), which introduced a mandate for states to have Strategic Highway Safety Plans (SHSPs). 23 CFR 450.306(d) requires the metropolitan transportation planning process should be consistent with the SHSP, and other transit safety and security planning.

### 4.9.2 Current Status

#### Transportation Safety

Strategic Highway Safety Plan (SHSP) – While SHSP development is led by RIDOT, the MPO staff is regularly involved, including for any relevant emphasis areas. The RIDSP has been a continuous supporter and contributor in the development of the SHSP, and employees are currently participating in the State’s process to update its SHSP.

Safety Plans Between Transportation Modes – Along with RIDOT’s SHSP, RIPTA has adopted a Public Transportation Agency Safety Plan (PTASP), as required by FTA. According to RIDOT, the eSTIP will improve the State’s ability to identify all known safety project locations and may eventually provide a means to address safety problems that are common to both agencies (e.g., better sidewalk access to a transit stop).

Safety Performance Measures – The RIDSP and RIDOT work closely in their annual process to set State targets or establish safety performance measures. According to the RIDSP, they work hand-in-hand with RIDOT to develop reasonably achievable performance targets. The RIDSP also stated they have gained a better understanding of the methodology used to develop safety performance measures and how the information is presented to the planning community. Performance planning meetings take place in the Summer where both RIDOT and RIDSP go over fatality and serious injury crash numbers and discuss how aggressive they could be in setting new performance measures. The results are defensible and reasonable and reflect a continued desire to reduce the number of fatal and serious injury crashes in Rhode Island. As noted in



[Section 4.11](#), the MPO also coordinates with RIPTA on transit safety measures and associated targets.

**Freight Safety** – The State’s freight plan includes safety performance measures. It also contains activities which will enhance safety for trucks at intersections that serve as freight access. The plan also includes safety improvements at railway crossings or other points of conflict. It was also noted that several projects RIDOT is sponsoring (i.e., Route 146, the missing move on I-95/Route 4) will not only provide better access but have a direct benefit on freight safety.

**Transportation Asset Management Plan (TAMP) and Safety** – Initially, safety was considered from a state of good repair standpoint. The next revision of the RIDOT TAMP will incorporate safety as a risk category and will also consider safety as part of an asset’s condition assessment. RIDOT’s effort to do project bundling has helped increase the deployment of safety projects by including them in other construction projects.

**Safety Concerns Expressed by the Community** – Besides reviewing data, public or local agency comments may lead to identification of safety concerns. The RIDOT stated that some concerns come to the State Traffic Commission. Additionally, RIDSP forwards safety concerns received via the planning process to RIDOT, and many communities already know to contact RIDOT directly to express their safety concerns. Regarding access to crash data, RIDOT is working to eventually provide access to the local agencies. RIDSP reports that high crash locations are currently a layer in their GIS mapping application that is available to the locals.

### Security Planning

The State of Rhode Island has a centralized division of information technology which manages cybersecurity for the State. The State systems use 2 or 3 levels of authentications for access and provides the RIDSP and other state agencies with trainings, including sending dummy spam emails.

The Rhode Island Traffic Management Center (TMC) has firewalls and redundant systems which protect them from hackers or ransomware attacks. The RIDOT also reports the camera systems and dynamic message signs are behind a firewall. Additionally, the RIDOT has established a secondary site to control the TMC in the case of a cyber-attack or natural disaster, and TMC emergency functions are coordinated with the Rhode Island Emergency Management Agency.

The State does have a continuity of operations plan and evacuation plans they maintain on a regular basis.



### 4.9.3 Findings

**Commendation:** The planning partners are commended for the degree of demonstrated teamwork in the State's development of its annual safety performance targets.

**Recommendation:** The Federal Review Team recommends further integration of safety planning between RIPTA and RIDOT, doing so would support a more holistic approach to safety and may identify areas that have a common safety interest.

## 4.10 Freight Planning

### 4.10.1 Regulatory Basis

Federal surface transportation law calls for the need to address freight movements as part of the transportation planning process (23 U.S.C. Section 134 and 23 CFR 450.306).

In 2012, changes were introduced to the planning process by requiring States, MPOs, and public transportation operators to link investment priorities to the achievement of performance targets. Freight movements are one of the key areas in which the MPO's performance targets address identified performance measures. Metropolitan transportation planning Section 23 U.S.C. 134 indicates that it is in the national interest to encourage and promote the safe and efficient management, operation, and development of surface transportation systems that will serve the mobility needs of people and freight and foster economic growth and development within and between States and urbanized areas.

Additional requirements of MPOs to integrate freight planning into the MPOs' transportation planning process include:

- As part of the MPO public participation planning requirements under 23 U.S.C. Section 134 and 23 CFR 450.316, consultation requirements were expanded in order to include freight shippers as interested parties that should be provided a reasonable opportunity to comment on MTPs and TIPs.
- 23 CFR 490.613 implements the requirements of 23 U.S.C. 150(c)(6) to establish performance measures for State Departments of Transportation (State DOTs) and the MPOs to use to assess the national freight movement on the Interstate System.
- 23 CFR 450.316(d)(4)(vi) states that an MPO shall integrate in the metropolitan transportation planning process, directly or by reference, the goals, objectives, performance measures, and targets described in other State transportation plans and transportation processes, including as appropriate (metropolitan) portions of the State Freight Plan.



#### 4.10.2 Current Status

Rhode Island's *Freight and Goods Movement Plan* (September 2016) outlines immediate and long-range strategies for multi-modal freight transportation investments through the year 2040. In 2020 the RIDSP, working with other federal, state and local agencies, completed the Port of Providence Truck Study which will inform ongoing statewide freight planning and assessment efforts. RIDSP also established a RI Freight Finder Mapping Application, to share freight transportation planning data with the public, municipal, regional, state and private sector partners and help inform current and future planning efforts.

The SPC established a Freight Advisory Committee comprised of municipal representatives, local universities, state government officials, port officials, environmental advocacy groups, freight advocacy groups, logistics experts, and industry representatives. The Committee assisted in the development of the freight plan and provides a forum to discuss strategies to aid in the efficient movement of freight and increase the collaboration between the public and private sector. The Committee advises the TAC and SPC on freight and goods movement priorities, issues, projects, and funding needs and meetings are held on a quarterly basis or more frequently if needed.

Municipal Freight Scans were conducted in the Fall of 2018 and Spring of 2019, in the City of Providence and in the Town of North Kingstown, to better equip, educate and provide attendees with an increased understanding of freight trends and issues. GIS Story Maps were prepared for each freight scan.

In 2019, RIDSP staff participated in the I-95 Corridor Coalition Freight Academy, an immersion program designed to train public sector agency staff whose planning, operation, and management work impacts goods movement decisions, investments, and interactions.

RIDSP is the lead entity responsible for the development, implementation and maintenance of the statewide *Freight and Goods Movement Plan*. The collaborative efforts between the RIDSP and RIDOT include setting the required system reliability targets for freight and truck travel time reliability, updating and discussing freight bottlenecks as part of the state Congestion Management Process, and participating and planning topics and agenda items for the state Freight Advisory Committee meetings.

When developing the MTP, the RIDSP includes freight shippers in the represented stakeholder outreach list and RIDSP has a documented process for how freight shippers and other stakeholders are provided opportunities to be involved in the MTP development. Freight reliability measures are included in the MTP, Appendix G: Performance Measures and Target Setting Report.



The FFY 2022-2031 TIP includes a discussion of the anticipated effect of the TIP's projects on achieving the federally required performance targets. The Performance Management section of the TIP identifies several projects that are being funded that will help achieve the targets for interstate travel time reliability, non-interstate travel time reliability, and truck travel time reliability such as the I-295 Cranston Canyon project, the I-95 Providence Viaduct Northbound, the I-195 Washington Bridge North, and the Newport Pell Bridge Ramp realignments. It is not clear how freight shippers and stakeholders are engaged in the TIP process.

### 4.10.3 Findings

**Commendation:** The RIDSP is commended for developing a multi-pronged approach to engaging stakeholders and driving freight planning forward within the state. The municipal freight scans, the development of the Port of Providence Truck Count and Assessment Study, the training academy for planners, and continued engagement of the Freight Advisory Committee continue to highlight the MPO's investment and commitment to freight planning.

**Recommendation:** Understanding that freight is and will be a growing source of congestion in the State, the RIDSP should provide opportunities for freight providers and stakeholders to participate in and solicit input into the transportation planning process. The PPP identifies engagement by these freight stakeholders in the MTP process, however there are no specific references in the TIP section and there is no section in the PPP for CMP as a major transportation document. In the next update of the Public Participation Plan, freight shippers and providers of freight transportation services should be included in the public coordination and outreach for the TIP. The PPP should also include a section related to the CMP, ensuring that freight stakeholders are engaged in the process.

## 4.11 Performance Management

### 4.11.1 Regulatory Basis

The following citations pertain to requirements for MPOs under performance management:

23 CFR 450.306(d) states that each MPO shall establish performance targets to support the national goals and track progress towards the attainment of critical outcomes. Each MPO shall coordinate with the relevant State to ensure consistency, to the maximum extent practicable, and establish performance targets not later than 180 days after the State or provider of public transportation establishes its performance targets. The selection of performance targets that address performance measures described in 49 U.S.C. 5326(c) and 49 U.S.C. 5329(d) shall be coordinated to the maximum extent practicable, with public transportation providers to ensure



consistency with the performance targets that public transportation providers establish under 49 U.S.C. 5326(c) and 49 U.S.C. 5329(d). Additionally, each MPO shall integrate the goals, objectives, performance measures, and targets from other performance-based plans and programs integrated into the metropolitan transportation planning process.

23 CFR 450.324(f)(3) and (4) outline requirements to the MTP. The MPO MTP shall include:

- a description of the (Federally required) performance measures and performance targets used in assessing the performance of the transportation system.
- a system performance report evaluating the condition and performance of the transportation system with respect to the (Federally required) performance targets including progress achieved by the MPO the performance targets.

23 CFR 450.218(q) and 23 CFR 450.326(d) require that, to the maximum extent practicable, a description of the anticipated effect of the TIP toward achieving the performance targets identified by the MPO in the MTP. TIPs shall link investment priorities to achievement of performance targets in the plan.

23 CFR 450.314(h) requires that the MPO(s), State(s), and the providers of public transportation shall jointly agree upon and develop specific written provisions for cooperatively developing and sharing information related to:

- transportation performance data,
- the selection of performance targets,
- the reporting of performance targets,
- the reporting of performance to be used in tracking progress toward attainment of critical outcomes for the region of the MPO (see § 450.306(d)) and the collection of data for the State asset management plan for the NHS.

23 CFR 450.340 states that MPOs have two years from the effective dates of the planning and performance measures rule to comply with the requirements.

#### **4.11.2 Current Status**

The MOA executed by RIDOT, RIPTA, and the MPO in June 2020 details the roles and responsibilities of the parties for target setting, data collection, and reporting for the federally required performance measures. There is regular coordination between the parties during the target setting process. To date, the MPO has chosen to adopt all targets as set by RIDOT and has similarly adopted RIPTA's transit asset management targets. In June 2021, the MPO did adopt slightly different transit safety targets than RIPTA's initial targets; however, this was to



correct a minor error in the targets RIPTA had developed and was done in consultation with RIPTA. The MPO has expressed its intent to follow RIPTA's targets in the future.

The current TIP, adopted in September 2021, includes a section on performance management. The section discusses the federal performance measures and targets adopted in Rhode Island. For most measures, the document outlines baseline performance and targets and highlights a few projects in the TIP which are expected to contribute to meeting the targets. For the transit measures, individual TIP investments are not highlighted but rather a general discussion of priorities and policies is provided.

The MTP discusses performance measures and performance management in multiple parts of the document. The body of the plan includes a brief recounting of how many performance targets from the previous iteration of the MTP were met and also includes an outline of measures, both federally required measures as well as locally identified measures, organized by the five goal areas of the plan. For each measure, the document includes baseline performance and a 2040 target (or desired trend for some measures). Appendix A to the MTP ("System Performance Report") is a detailed recounting of the performance measures from the prior MTP with details on data sources, baseline benchmark performance, and targets. Finally, Appendix G contains a "Performance Measures and Target Setting" report which covers 48 discrete measures and includes baseline performance and targets for 2025, 2030, and 2040. The targets set for 2040 were extrapolated from current trends in some cases and in other cases simply carry shorter term targets out through the planning horizon.

The Division of Statewide Planning's MPO website includes a page for Transportation Performance Management. This page addresses the federal performance measures and has sub-pages for each of the measure areas (e.g. roadway safety, transit safety, bridge and pavement condition, etc.). Each topical sub-page includes a description of the performance measures and a timeline for adoption and reporting requirements. The transit measures include snapshots of the MPO's baseline performance and current targets for each measure; the highway measures do not have Rhode Island-specific information but rather provide links to FHWA webpages. In addition, an explanation of the connection between PBPP and project selection as it connects to the TIP and MTP would be helpful in explaining the relationship between the investment of resources and progress towards the achievement of state-wide goals.

#### **4.11.3 Findings**

The planning process in Rhode Island shows clear evidence of work to monitor performance across a range of measures and areas. A great deal of performance information is available and is being shared in different arenas, although there are still some data gaps particularly for locally identified performance measures. The components of the federally required system



performance report are all included throughout the MTP, but they were not all easily found or interpreted. Some of the conclusions that might be drawn from the information can be lost because it is difficult to sift through.

**Recommendation:** The next MTP update should include a system performance report that summarizes the relevant information in an easily digestible format. The appendices could continue to hold the detailed background information.

**Recommendation:** The MPO should use its existing Transportation Performance Management website to better communicate the performance targets and progress that is being made in Rhode Island. This may be accomplished by directly providing targets and performance data for the FHWA targets, and the MPO may also consider if its locally identified performance measures are also important to share via the site.

## 4.12 Congestion Management Process / Management and Operations

### 4.12.1 Regulatory Basis

23 U.S.C. 134(k)(3) and 23 CFR 450.322 set forth requirements for the congestion management process (CMP) in TMAs. The CMP is a systematic approach for managing congestion through a process that provides for a safe and effective integrated management and operation of the multimodal transportation system. TMAs designated as non-attainment for ozone must also provide an analysis of the need for additional capacity for a proposed improvement over travel demand reduction, and operational management strategies.

23 CFR 450.324(f)(5) requires the MTP include Management and Operations (M&O) of the transportation network as an integrated, multimodal approach to optimize the performance of the existing transportation infrastructure. Effective M&O strategies include measurable regional operations goals and objectives and specific performance measures to optimize system performance.

All ITS projects funded by the Highway Trust Fund must be consistent with the provisions laid out in 23 CFR Part 940. A few items included in 23 CFR Part 940:

- Provision should be made to include participation from the following agencies, as appropriate, in the development of the regional ITS architecture: Highway agencies; public safety agencies (e.g., police, fire, emergency/medical); transit operators; Federal lands agencies; State motor carrier agencies; and other operating agencies necessary to fully address regional ITS integration.





- The agencies and other stakeholders participating in the development of the regional ITS architecture shall develop and implement procedures and responsibilities for maintaining it, as needs evolve within the region.
- Major ITS projects should move forward based on a project-level architecture that clearly reflects consistency with the national ITS architecture
- All projects shall be developed using a systems engineering process.

#### 4.12.2 Current Status

##### Congestion Management Process

The Rhode Island Congestion Management Process (CMP), dated June 2020, identifies congestion, develops monitoring processes, and summarizes congestion management strategies. In addition to the CMP, an online story map was prepared, and annual reports will be developed (the first one was complete in June of 2021). Two groups assisted in the development of the CMP, the Congestion Management Task Force (CMTF) and the Congestion Management Working Group (CMWG). The CMTF continues to meet on a quarterly basis to further institute congestion management as a routine planning practice. RIDOT is using the CMP data, mapping out congested corridors to assist in understanding diversion routes for example. In the future, RIDOT anticipates further integrating CMP data into their process to incorporate identified bottlenecks and other items into their eSTIP / SWIFT framework.

As the CMP continues to mature and data sources are post-COVID normalized, it is anticipated the CMP will continue to be a valuable planning document to RIDOT and RIDSP.

The Federal Review Team reviewed the CMP document using the [FHWA CMP Guidebook](#) as a supplement in its review process. The Guidebook provides an 8-step process model and includes activities or actions that are common to successful CMPs. A step by step summary is provided below:

##### Step 1. CMP Objectives for Congestion Management

The CMP includes 8 RI CMP Objectives: Improve Reliability of the Transportation System, Reduce Recurring Congestion, Improve Freight and Goods Movement, Increase Modal Choice and Competitiveness, Improve Intermodal Connectivity, Promote and Invest in Innovative Congestion Management Technologies, Promote Land Development and Infill Development/Redevelopment in Transportation Efficient Locations, Reduce Emissions and Improve Air Quality. The CMP objectives meet the review goals and they are used throughout the plan and are related to specific performance measures. Examples include, Table 5.1 and 5.2 in the document.



## Step 2. Definition of State's CMP Network

The CMP network total is 1,073 miles and includes all roadways within RI which are functionally classified as minor arterial or a higher classification. The plan includes a CMP network for public transportation services and bicycle infrastructure. The State defined its network by using the RI Geographic Information System (GIS) overlaid with a shapefile from INRIX which showed their coverage of the existing roadway network within RI. The decision to use functional classification as the basis for the CMP network rather than the INRIX network was because functional classification is an easily measured attribute and the State felt it could better manage and change the network if needed. The CMP presents a thorough consideration of what should be included in the CMP network. Having bicycle and public transportation included in the CMP network is advantageous in considering strategies which rely upon other modes to reduce single occupancy vehicle travel.

## Step 3. Development of Multimodal Performance Measures

In the context of what is appropriate to the State and its needs, the CMP includes an appropriate discussion of how RIDSP defines delay congestion and follows that with an identification of the types of congestion specific to RI. This is the basis for how the State or CMP Working Group developed its performance measures. A 2018 baseline of performance measures is displayed in Table 4.1. The baseline performance measures will be used to assess progress made in achieving each of the CMP objectives.

## Step 4. Collect Data / Monitor

RIDSP uses National Performance Management Research Data Set (NPMRDS) analytics as its basis for reporting system performance measures. Additional data is also collected from the National Oceanic and Atmospheric Administration (NOAA), the State's Traffic Management Center, INRIX (purchased data), RIPTA, and the Census. Table 5.1 identifies future data needs or enhanced data capabilities to fully support all the CMP's Performance Measures and Objectives.

The RIDSP plans to monitor its progress by following the status of its projects. They will evaluate their effectiveness by reviewing before and after conditions along with an analysis of historical trends to identify improvements or degradation in system performance. To further support their progress RIDSP will generate an annual report that identifies progress on each of the CMP performance measures.



The document states the CMP should be updated in conjunction with the MTP and annual reports are generated to monitor the status of ongoing congestion relief projects and update performance measures with data from the prior year.

#### Step 5. Analyze Congestion Problems and Needs

The CMP presents an analysis of congestion by month and hour. The RIDSP evaluated its TMC covered roadways segments and determined any roadway with an average speed of less than 60 percent of the posted speed limit for any 5-minute interval was their threshold for congestion. The CMP also identifies and ranks 30 locations considered to be a bottleneck and 20 locations considered to be a freight bottleneck.

#### Step 6. Identify and Assess Strategies

The CMP lists congestion management strategies by priority. The strategies are focused on trip reduction, land use, expanded public transportation, mode shift, and operational improvements. It also lists more specific opportunities to improve congestion in other planning documents or plans (i.e., 2040 MTP and the Transit Master Plan), opportunities to improve or expand service, and Bicycle and Pedestrian Improvement plans. Table 7.1 maps demand management strategies to current conditions and illustrates where more could be done. Chapter 7 of the CMP contains a comprehensive list of strategies available to RIDSP and in some instances maps these strategies to available tools, models, or analysis opportunities.

#### Step 7. Program and Implement Strategies

The CMP discusses how it will inform and receive information from other major planning documents including the MTP, TIP, SHSP, and Freight Plan. It also illustrates an approach to for the CMP analysis process and suggests when an analysis should or should not occur. Table 8.3 presents a Congestion Management Action Plan and details initiatives and activities which will further integrate the CMP into RIDSP planning practices.

The CMP does not recommend or identify specific projects but focuses on how the document will influence other plans. That said, it does specifically mention programs it could pursue such as the Road Service Patrol and local assistance for implementation efforts related to Complete Street initiatives.

#### Step 8. Evaluate Strategy Effectiveness

Given the recent creation of the stand-alone CMP, it is reasonable to assume the CMP is still being integrated into the State's various planning processes and at this juncture many of



the initiatives included in the plan have yet to be deployed or at the point to consider evaluation.

### Management and Operations

ITS devices along the state's highway system consists of roadway camera systems, closed circuit television cameras, changeable message signs, radar vehicle detection sensors, conventional count stations and sensors, and wrong-way driver detection systems. These devices are used for the primary purposes of improving overall system safety and /or reducing congestion.

RIDOT introduced an autonomous, electric shuttle under a 2019 pilot. The "Little Roady Shuttle Pilot Project", as it was called, traveled a 5-mile road along the Woonasquatucket River serving 12 stops. The pilot engaged the community, stakeholders and policy-makers in planning and research for autonomous vehicles.

RIPTA's fleet is equipped with ITS (Automatic Vehicle Location equipment is in 100% of the fleet and Automated Passenger Counter equipment is in about 60-70% of the fleet) and they continue to work on the intersection side (e.g. transit signal priority for the Bus Rapid Transit corridor and planning to expand transit signal priority and queue jumps) to improve on-time performance, reduce operational delays and enhance the transit passenger experience.

*RIDOT ITS State Architecture Plan:* The last update was prepared in 2014 and the State currently has a consultant under contractor to facilitate an update to the current Plan, the update is anticipated to be completed in the Spring of 2022; however, the scope or schedule for the update are not available online.

*RIDOT 2015 to 2020 ITS Strategic Deployment Plan:* This plan is in the process of being updated in conjunction with the update of the State's ITS Architecture Plan. The existing plan, and the scope and schedule for the plan update are not available online to stakeholders or the public.

*Traffic Incident Management (TIM):* This is a well-integrated program and TIM training is included in both the police and fire academies. The State is currently working to develop a virtual TIM training program as a result of COVID-19. TIM is an emphasis area included in the Strategic Highway Safety Plan (2017-2022).

It was not clear if RIDOT uses a systems engineering process when developing and advancing projects.

### **4.12.3 Findings**



**Commendation (CMP):** The RIDSP and RIDOT are commended for their approach and application of the CMP. RIDSP and RIDOT’s commitment to improving congestion and advancing congestion mitigation strategies are evident in their planning documents and project examples. To further institutionalize the use of the CMP as an effective tool to understand and mitigate sources of congestion in RI, RIDOT and RIDSP are encouraged to continuing moving forward with items listed in the Congestion Management Action plan.

**Recommendation (CMP):** The CMP states the plan should be updated in conjunction with the State’s MTP and that annual reports be generated, which will monitor the status of on-going congestion relief projects and updating performance measures with data from the prior year. Given new funding sources and the resulting acceleration of project deployment, it is recommended RIDOT and RIDSP consider looking at the overall congestion management ‘process’ during the annual report preparation to assess how it is working and if adjustments need to be made.

**Commendation (M&O):** The State’s TIM program is recognized as the Nation’s leader in supplying TIM training. Developing a virtual alternative will ensure the program continues to be successful.

**Recommendation (M&O):** RIDOT should work to complete core ITS planning documents in a timely manner, completing them by the end of 2022. These documents and the planning process will further ensure stakeholder engagement and consistency with the national ITS architecture and 23 CFR Part 940. Transparent documentation should be included on the RIDOT or other appropriate websites.

**Recommendation (M&O):** RIDOT should ensure any ITS projects follow a [system engineering analysis](#).

## 4.13 Environmental Mitigation and Resiliency

### 4.13.1 Regulatory Basis

Environmental mitigation and resiliency are outlined in 23 USC 450 (specifically, subparts 224, 306, 316, 318, and 320). Metropolitan Transportation Plans (MTPs) are required to protect and enhance the environment, promote energy conservation, improve the quality of life, and promote consistency between transportation improvements and State and local planned growth and economic development patterns, as well as emphasize the preservation of the existing transportation system. As part of the metropolitan planning process, MPOs are also required to consider how to improve the resiliency and reliability of the transportation system and reduce or mitigate stormwater impacts of surface transportation.



### 4.13.2 Current Status

A range of partners are involved in planning for resiliency in Rhode Island, focusing on transportation along with many other facets. RIDSP partners with local communities and other state agencies such as the Coastal Resources Management Council along with the University of Rhode Island. The outputs of this work can inform the decision-making for RIDOT and RIPTA as well as local governments.

RIDSP has completed assessments of the vulnerability of state and municipal transportation assets to sea level rise (SLR) and storm surge. An online mapper shows these assets with three different amounts of SLR, and these data layers are expected to be integrated into the project evaluation and selection tool that is under development. Analysis has shown that the majority of assets adversely impacted are local roads. A next step the RIDSP hopes to work on is being able to estimate the costs for roadway mitigation treatments; staff are hoping to gather information from other states that have worked on similar issues. Although riverine flooding is also known to be an issue for transportation assets in the state, this has not yet been mapped.

The MTP includes several environmentally focused performance measures, primarily focusing on facilities vulnerable to SLR. Appendix J of the MTP discusses environmental impacts of the transportation system on aspects on the environment such as air quality, water resources, and wildlife.

### 4.13.3 Findings

SPC provides a great deal of resources demonstrating their environmental efforts, and it is clear that this is a very extensively developed and integrated part of their transportation decision-making process.

SPC and RIDOT have put out many publications and seem to have performance measures in place regarding environmental concerns. Although clearly the commitments and effort are a priority, it is unclear how it is implemented. Both agencies would benefit from demonstrating how all of these efforts impact the transportation decision-making process. Current plans are to integrate the climate resilience efforts into map overlays for project prioritization and that will be a great example when that is implemented.

**Commendation:** Both RIDOT and the MPO have an extensive amount of environmental resources that are an exemplary example of prioritizing environmental concerns.

**Recommendation:** It would be beneficial, and also assist in transparency, for the MPO to demonstrate how environmental efforts factor into the transportation decision-making process.



U.S. Department of Transportation  
Federal Highway Administration  
Federal Transit Administration



## APPENDIX A – PARTICIPANTS AND MEETINGS

The following individuals from the federal agencies were involved in the Providence urbanized area virtual review meetings:

FHWA	FTA
Randy Warden	Leah Sirmin
Wilfred Hernandez	Margaret Griffin
Michael Chong	Ryan Bartlett
Jennifer Carrier	
Jill Stark	
Mack Frost	
Christina Ignasiak	
Brandon Oliver	

Agendas and attendees of the virtual and public meetings can be found below.

### Day 1 – AM Session: February 8, 2022

9:00 AM	0:15	9:15 AM	Introductions, Virtual Meeting Logistics, and Opening Remarks
9:15 AM	0:30	9:45 AM	MPO Opportunity to Present / Showcase Efforts
9:45 AM	0:45	10:30 AM	MPO Organizational Structure, Governance and Agreements
10:30 AM	0:15	10:45 AM	Break
10:45 AM	1:00	11:45 AM	Metropolitan Transportation Plan

### Day 1 – PM Session: February 8, 2022

2:00 PM	0:45	2:45 PM	TIP and Project Selection
2:45 PM	1:00	3:45 PM	Financial Planning

### Day 2 – AM Session: February 9, 2022

8:30 AM	0:10	8:40 AM	Introductions and Virtual Meeting Logistics
8:40 AM	1:00	9:40 AM	Civil Rights
9:40 AM	0:45	10:25 AM	Public Involvement





## Day 2 – PM Session: February 9, 2022

12:30 PM	1:00	1:30 PM	Transit Planning
1:30 PM	1:00	2:30 PM	Safety Planning
2:30 PM	0:15	2:45 PM	Break
2:45 PM	1:00	3:45 PM	Performance Based Planning and Programming

## Day 3 – PM Session: February 10, 2022

1:00 PM	1:00	2:00 PM	CMP and Management & Operations
2:00 PM	0:45	2:45 PM	Freight Planning
2:45 PM	0:15	3:00 PM	Break
3:00 PM	0:45	3:45 PM	Environmental Mitigation and Resiliency
3:45 PM	0:15	4:00 PM	Final Thoughts and Closing Remarks

### Attendees

FHWA and FTA: Outlined above

RIDOA-RIDSP: Benny Bergantino, Meredith Brady, Kathy Crawley, Linsey Callaghan, Mike D’Alessandro, Christina Delage Baza, Christopher Durand, Vincent Flood, Kim Gelfuso, Paul Gonsalves, Caitlin Greeley, Roberta Groch, Nancy Hess, Benjamin Jacobs, Maria Mignanelli, Josh O’Neill, Mason Perrone, Tim Stagnitta

RIDOT: Stephen Almagno, Pam Cotter, Sheree Gomes, Andrew Koziol, Wayne Owens, Sean Raymond, Nancy Rodriguez, Barry Simpson, Kevin Simpson, Ken White, Michael Wreh, Amy Thibeault

RIPTA: Sarah Ingle, Greg Nordin



## APPENDIX B – PUBLIC COMMENT REQUEST



U.S. Department  
 of Transportation

Federal Highway Administration  
 RI Division  
 380 Westminster Street, Suite 601  
 Providence, RI 02903  
 (401) 528-4541  
 (401) 528-4542 (fax)

Federal Transit Administration  
 Region I  
 55 Broadway, Suite 920  
 Cambridge, MA 02142-1093  
 617-494-2055  
 617-494-2865 (fax)

### Public Input Opportunity

Come share your views about the transportation planning process  
 in Rhode Island!

Federal law requires every metropolitan area with a population over 50,000 to have a designated Metropolitan Planning Organization (MPO) to qualify for receipt of federal highway and transit funds. The State Planning Council (SPC), which is staffed by the Rhode Island Department of Administration's Division of Statewide Planning, is the designated MPO responsible for transportation planning in the State of Rhode Island. Every four years, the Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) are required to review the metropolitan transportation planning process conducted by the SPC, along with its state and local partners, in order to certify that they are carrying out the process in accordance with all applicable Federal requirements.

As part of this review, the Federal agencies would like to hear from members of the public regarding how the transportation planning process is conducted in the region.

Comments can be offered at the virtual public meetings conducted by FHWA and FTA, which are to be held during the regularly scheduled meetings of the:

State Planning Council  
**February 10, 2022 at 9:00 AM**

Transportation Advisory Committee  
**February 17, 2022 at 5:30 PM**

*Please visit the Division of Statewide Planning website for meeting location and/or Zoom log-on information at <http://www.planning.ri.gov/>*

If you are unable to attend, you may also submit your comments or observations in writing at <https://planning.ri.commentinput.com/?id=KR9MC>

Additionally, feedback on the planning process may be submitted to either of the federal contacts below:

**Federal Contacts:**

**FHWA:** Randy Warden  
 380 Westminster Street, Suite 601  
 Providence, RI 02903  
 Email: [randy.warden@dot.gov](mailto:randy.warden@dot.gov)

**FTA:** Leah Sirmin  
 55 Broadway, Suite 920  
 Cambridge, MA 02142  
 Email: [leah.sirmin@dot.gov](mailto:leah.sirmin@dot.gov)

All Comments must be received no later than 4:00 pm on February 25, 2022.

*The meeting location is accessible to handicapped persons and individuals with disabilities. Any individual requiring accommodation to participate in this meeting should contact Lisa Middleton at 401-222-2180 (voice) or #711 (R.I. Relay) as soon as possible. Any individual requiring the services of an interpreter should contact Benny Bergantino at 222-1755 (voice) as soon as possible.*



U.S. Department  
of Transportation

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Rt Division  
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617-494-2865 (fax)

## Oportunidad para que el público opine

### Venga a compartir sus ideas con respecto al proceso de planificación para transporte en el estado de Rhode Island

Las leyes federales requieren que cada área metropolitana con una población de más de 50,000 habitantes tenga designado una Organización de Planificación Metropolitana (OPM) (en inglés Metropolitan Planning Organization (MPO)) para calificar por fondos monetarios federales de carreteras y tránsito. El Consejo de Planificación Estatal, es la organización designada por ley federal como la Organización de Planificación Metropolitana (OPM) responsable por la planificación de transporte en Rhode Island. La División de Planificación Estatal del Departamento de Administración de Rhode Island, provee el personal para el OPM. Cada cuatro años, la Administración Federal de Carreteras (en inglés Federal Highway Administration (FHWA)) y la Administración Federal de Transporte (en inglés Federal Transit Administration (FTA)) están obligados a hacer un análisis del proceso de planificación metropolitana de transporte que lleva a cabo el Consejo de Planificación Estatal junto con sus asociados de los gobiernos locales y estatales. Para así certificar que estén cumpliendo con el proceso de acuerdo con los requerimientos federales.

Como parte del análisis, las agencias federales desean oír las opiniones del público con respecto a cómo el proceso de planificación de transporte es conducido en la región.

Puede dar sus opiniones en la reunión virtual conducido por la Administración Federal de Carreteras y la Administración Federal de Transporte, que se llevaran a cabo durante las reuniones regulares de las entidades que siguen:

Consejo de Planificación Estatal  
10 febrero 2022 a las 9:00 AM

Comité Asesor de Transporte  
17 febrero 2022 a las 5:30 PM

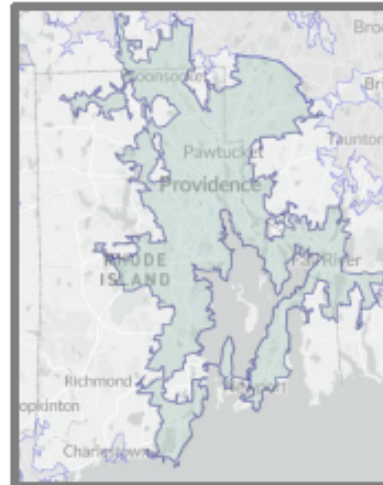
Por favor visite la página web de la División de Planificación Estatal para averiguar a donde se llevará a cabo la reunión o para conseguir la información de entrada para el programa Zum a <http://www.planning.ri.gov/>

Si no puede asistir a las reuniones, puede someter sus comentarios u observaciones por escrito a <https://planning.ri.commentinput.com/?id=KR9MC>



# 2022 Federal Certification Review

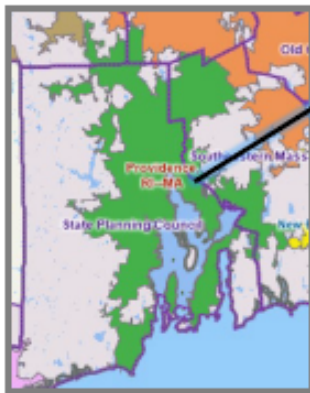
of the  
**State Planning Council - Metropolitan  
 Planning Organization**  
 for the  
**Providence, RI – MA Transportation  
 Management Area**



## Overview

At least once every four years, the U.S. Department of Transportation (DOT) must certify that a Metropolitan Planning Organization (MPO) serving a Transportation Management Area (TMA) – an urbanized area with a population over 200,000 – is carrying out the metropolitan transportation planning process in adherence with federal requirements under [23 U.S.C. 134](#) and [49 U.S.C. 5303](#). The Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) jointly conduct this review, make a certification determination, and produce a report that may include compliance issues (corrective actions), areas for improvement (recommendations), and/or notable practices (commendations). Based on these findings, the MPO will either be “certified,” “certified with conditions or restrictions,” or “not certified”.

## Providence, RI - MA TMA



**Designated MPO:**

**State Planning  
 Council**

↓

Staffed by:



**Comprised Of:**

State, Local and Public  
 Representatives and  
 Other Advisors



### Metropolitan Transportation Planning Process

A continuous, cooperative, and comprehensive (3-C) process that informs transportation decisions, including how projects are selected and prioritized for implementation within a region.

With limited funds, this is critical for prioritizing regional needs and identifying projects that best meet performance goals and objectives while providing public benefit. The process assists in developing a framework for the future transportation system.

### 3-C Planning Process

**Continuous:** Regularly addressing short-term needs and long-term regional goals

**Cooperative:** Involving all interested parties through a public participation process

**Comprehensive:** Multimodal in scope and consistent with other regional and statewide planning products and federal planning factors



## Four Key MPO Planning Documents

*Please note that there are other federal requirements applicable to MPOs, however these are four core planning documents that frame the metropolitan transportation planning process.*

### Unified Planning Work Program (UPWP)

Lists transportation tasks, products, and associated costs that MPO staff and other responsible parties will perform to support the metropolitan transportation planning process.

*Updated annually*



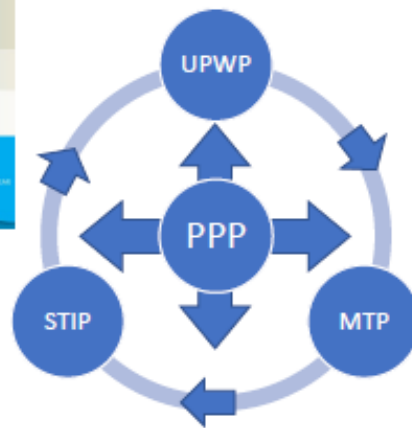
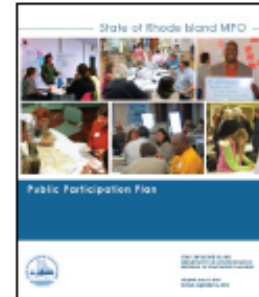
**State Transportation Improvement Program (STIP)**  
 Identifies transportation investments, and associated costs, by year for implementation in the region over the next 4 years. Projects reflect investment priorities from the MTP and activities from the UPWP.

*Updated regularly; New STIP prepared at least every 4 years*

### Public Participation Plan (PPP)

Documents public involvement strategies that provide the general public and planning stakeholders with meaningful opportunities to influence transportation decisions throughout the planning process.

*Updated as needed*



**Metropolitan Transportation Plan (MTP)**  
 Also known as a Long Range Transportation Plan (L RTP)  
 Establishes regional goals, strategies, projects, and priorities for an integrated intermodal transportation system that reflect current and future demand over at least 20 years.

*Updated every four years*

### Things to Think About...

What are your views on the planning process?

- What are some challenges?
- What are some strengths?

Do you feel you understand how the planning process works and how to get involved?

Do you feel like you have adequate opportunities to participate and be heard?

### How is the Process Going? We Want Your Input!

Written comments can be submitted by February 25, 2022 to:

**FHWA:** Randy Warden, FHWA Rhode Island Division  
[randy.warden@dot.gov](mailto:randy.warden@dot.gov) or  
 380 Westminster Street, Suite 601; Providence, RI 02903

**FTA:** Leah Sirmin, FTA Region 1  
[leah.sirmin@dot.gov](mailto:leah.sirmin@dot.gov) or  
 55 Broadway, Suite 920; Cambridge, MA 02142

Comments can also be submitted on-line using Smart Comment:  
<https://planning.ri.commentinput.com/?id=KR9MC>

Si desea esta información en español por favor mande un correo electrónico a [audry.bendigo@dot.gov](mailto:audry.bendigo@dot.gov) con su información.





## APPENDIX C – PUBLIC COMMENTS, SPC and TAC INPUT

Stakeholder and public comments were solicited at meetings of the Rhode Island State Planning Council (SPC) on February 10, 2022, the Rhode Island Transportation Advisory Committee (TAC) meeting on February 17, 2022, through comments received via email to the Federal Review Team and through the virtual online Smart Comment platform.

Meeting minutes for the SPC meeting can be found here:

<https://opengov.sos.ri.gov/Common/DownloadMeetingFiles?FilePath=\Minutes\343\2022\422674.pdf>

Meeting minutes for the TAC can be found here:

[http://www.planning.ri.gov/documents/tip/2022/TAC%202-17-22-DRAFTIII\\_Minutes.pdf](http://www.planning.ri.gov/documents/tip/2022/TAC%202-17-22-DRAFTIII_Minutes.pdf)

The following summarizes the comments received, categorized by general theme:

### **Modal Preference**

Many commenters felt that the process was biased towards automobiles and against transit, bicycle, and pedestrian travel. Some felt the investment decisions made were not appropriately distributed to non-auto modes. It was expressed that RIDOT was not open to communities' desires for bicycle and pedestrian investments. Some felt the BMP and TMP were not being followed and implemented properly.

### **Public and Stakeholder Engagement**

Commenters generally indicated that public participation has some strengths and some weaknesses. Many of the comments on weaknesses cited particular examples including the Kennedy Plaza and multi-hub project, East Bay Bike Path, TIP amendments, and the 6/10 reconstruction project. It was expressed that RIPTA is a good example of strong public participation, doing outreach on important projects or when fare or route changes are proposed as required by FTA. Some felt that RIPTA's governing board was an important factor in its successful engagement with the public and that RIDOT should have a board as well or develop some other collaborative forum. Several commenters felt the RIDOT, RIDSP, the SPC, and the TAC do the minimum that is required by law when it comes to public participation. Some felt that the input that was received during public participation was disregarded by the decision-makers.

It was expressed that RIDOT has no real exchange with stakeholders. A couple of commenters noted that the RIDOT outreach processes did not engage neighborhoods. Several felt there were deficiencies in how RIDOT reaches out to transit users as well. Some indicated RIDOT was not responsive to the feedback that is provided. It was expressed that RIDOT public meetings are not well noticed, and information is not provided in advance to allow for meaningful input.

Some commenters noted that the TIP is not an easy process for the public to engage with and does not lend itself to a public comment process. There was not a clear feedback loop for public suggestions for



projects ranging from new multiuse paths to sidewalk maintenance or intersection improvements. One commenter noted that it is not widely known if public comment is accepted for road and bridge projects. Some noted a need for early and educational outreach, including on avenues for making suggestions on projects to municipal officials, and that the public should be engaged prior to the production of the TIP.

A few agencies and municipalities commented that they find planning staff is a valuable resource. They indicated they have good relationships and access to planning staff and there are always avenues to ask questions. One noted that, as a municipality, they have many opportunities to participate (such as on the Technical Committee) and that their partnership with RIDSP has been important in such aspects as in developing a transportation master plan for their city. Another agency noted that the RIDSP newsletter has been a useful source of information and communication. An individual who has served on the freight advisory committee for several years feels transportation planning experiences have been positive and the RIDSP is a great collaborative partner and resource, including support of a port community working group. It was further relayed that freight tours were effective and statewide planning has helped address issues, advancing a truck study and working on diesel engine replacement efforts.

### **Procedural Practices**

Several comments indicated concerns related to procedures used within the planning process. Some of the comments focused on the TAC and its processes. Commenters felt the TAC process is broken and expressed that, although the agency calls for public comments, the documents are prepared through an unclear process, that they are not the subject of public information workshops, and are written in a highly technical and arcane fashion. It was felt that public comments made at the TAC do not result in a change in the recommendations the TAC makes. Some felt that the TAC meeting process does not allow the TAC to appropriately consider public input, for instance voting on actions right after comments are received. Others stated that TAC does not have sufficient discussion of goals, alternatives, policies and strategies. It was also expressed that they feel the TAC was not provided the opportunity to rank project proposals. Some felt that the TAC and SPC did not provide proper checks and balances, and that RIDOT has too much power. A commenter expressed that they feel SPC “rubberstamps” what RIDOT proposes.

One commenter noted the changes that were made to the SPC for the better. They also indicated that the TAC has added public comment in the beginning and at the end of every meeting, and that members do sit in TIP public meetings and review the list of all comments that were received.

Some commenters felt that MPO rules and procedures were not being properly followed. For instance, some indicated that a project solicitation should have been conducted with the most recent STIP update. It was also mentioned that the SPC did not vote on the TIP modification MOU that is utilized.

A commenter also questioned whether a state infrastructure implementation coordinator was appointed and questioned the coordination of the TIP amendment with other state agencies such as the RI Executive Climate Change Coordinating Council.



## APPENDIX D – PREVIOUS FINDINGS AND DISPOSITION

The previous certification review for the Providence urbanized area was conducted in 2018, with the certification issued on April 28, 2018. The 2018 Certification Review recommendations and the current appraisal are summarized below. Please note that appraisals below are reported by MPO staff; they do not serve as an assessment by the Federal Review Team.

Review Area	Corrective Action / Recommendation	Finding / Resolution Due Date (From April 2018 TMA Certification)	MPO Appraisal (1/2022)
MPO Structure and Agreements	Corrective Action	<p>The MPO, RIDOT, and RIPTA must develop written agreements(s) that fulfill federal requirements.</p> <p>A complaint written agreement must be endorsed by May 1, 2019</p>	<p>The parties executed a <a href="#">Tri-Party Agreement</a> in 2018 and again in 2020. Provisions were added regarding the responsibilities for transportation performance data, including the selection of performance targets, reporting of performance targets, tracking the progress towards attainment of the targets and critical outcomes for the MPO, the development of financial plans, and the annual listing of obligated federal funds.</p>
	Corrective Action	<p>In accordance with 23 CFR 450.316(e) the MPO must develop a documented process for local elected officials from local governments and other governmental agencies to participate in the planning process for developing the TIP and MTP for the region and implement that process. This may be undertaken as part of the update to the metropolitan planning agreement.</p> <p>Documented procedures must be in place by May 1, 2019</p>	<p>The Division of Statewide Planning completed an update to the MPO's <a href="#">Public Participation Plan (PPP)</a> in June 2019. The PPP now documents and outlines the process for how the public, local elected officials, and local government agencies can participate in the transportation planning process. In addition, the Division has developed consensus and has successfully amend <a href="#">Rhode Island General Laws, Section 42-11-10</a>, which specifies membership of the State Planning Council, to include three additional local elected officials from municipalities with different populations, as well as state emergency management leadership, the business community, and environmental justice organizations. Article 4 of the FY 2020 Rhode Island Appropriations Act (2019-H-5151) passed both the Rhode Island House and Senate and was signed by Governor Raimondo.</p>
	Recommendation	<p>Inclusion of local officials and major modes of transportation should be implemented to the maximum extent possible.</p>	<p>Please see response above. In addition, the Rhode Island Turnpike and Bridge Authority (RITBA) now has a seat at the Transportation Advisory Committee and Freight Advisory</p>





			Committee tables.
Metropolitan Transportation Plan	Recommendation	The MTP should clearly identify projects for the out-years of the plan. The financial constraint analysis should provide an easy-to-understand comparison of these anticipated costs against anticipated revenues.	<a href="#">L RTP 2040</a> satisfies the MPO's MTP requirements. Page 42 of L RTP 2040 addresses anticipated future projects, including Regionally Significant Projects. Additional information can be found in <a href="#">Appendix E, Pool of Projects</a> and <a href="#">Appendix M, 20-Year Transit Investment Scenario Report</a> . Page 31 of L RTP 2040 summarizes financial constraint with additional information provided in <a href="#">Appendix F, Revenue Projections Report</a> , <a href="#">Appendix R, Fiscal Constraint Table</a> , <a href="#">Appendix M, 20-Year Transit Investment Scenario Report</a> , and <a href="#">Appendix O, State Rail Plan Supplement</a> . These documents can also be found on the <a href="#">L RTP documents webpage</a> .
	Recommendation	In preparation of the plan, the MPO should coordinate closely with its partner agencies on transit topics, especially to ensure consistency of proposed investments in the MTP and in relevant transit asset management plans.	Throughout the preparation of the MTP/L RTP, working group meetings with participating representatives from RIPTA, RIDOT, RI Dept. of Health, and RI Dept. of Environmental Management were held. Consistency with proposed asset management plans was provided through coordination with the RIDOT Office of Planning and RIPTA's planning unit. More information on transit asset management can be found in <a href="#">Appendix M, 20-Year Transit Investment Scenario Report</a> .
Transit Planning	Recommendation	The MPO and its partners should consider developing a template or guide for an MOU to be used on projects involving multiple jurisdictions.	Comment noted. Currently, the responsible agency for executing projects is identified in the FFY 2022-2031 STIP Project Tables. RIDOT and RIPTA also maintain sub-recipient agreements outlining terms with sub-recipients and those projects involving multiple jurisdictions. Also please review the <a href="#">RIDOT Sub-Recipient Procedures and Checklists Manual</a> .



	Recommendation	The MPO should develop its performance measures spreadsheet in greater specificity, giving transit its own section.	Comment noted. RIDSP has added <a href="#">website content detailing FHWA and FTA Performance Measures</a> . In 2021, RIDSP/ Rhode Island MPO adopted annual <a href="#">Transit Safety Targets</a> . The RI MPO also updated <a href="#">Transit Asset Management Targets</a> .
	Recommendation	RIPTA should complete its target setting, which was required to be complete by December 31, 2017, and coordinate with the MPO as the MPO adopts region TAM targets. RIPTA should also coordinate closely with the MPO in order to ensure that the deadline of October is met for having a TAM plan complete.	Please review information on the <a href="#">RI MPO's transit asset management targets</a> which were developed closely with the transit provider, RIPTA.
	Recommendation	RIDOT, RIPTA, the MBTA, and the MPO should coordinate to develop a shared understanding of the process of target setting and planning for state of good repair for commuter rail assets in Rhode Island.	RIDOT, RIPTA, and RIDSP all coordinate on the target setting process for state of good repair for commuter rail asset facilities as formalized in the <a href="#">TriParty Agreement</a> . Rhode Island is only responsible for its facility assets and the MBTA, as operator, is responsible for rolling stock. Please also review information on the targets in the <a href="#">FFY 2022-2031 STIP, page 1-35 to 1-36</a> , in the <a href="#">LRTP Appendix G, page 18</a> . <a href="#">LRTP Appendix C Baseline Infrastructure &amp; System Report pages 49-51</a> , and <a href="#">LRTP Appendix M 20 Year Transit Investment Scenario Report</a> .
Transportation Improvement Program	Recommendation	The MPO and RIPTA must work together to provide timely and accurate project financial sources and funding levels for each of the federal, and non- federal funding sources, for all capital and operating costs in the metropolitan planning area. This must be completed during the next update to the transportation improvement program.	A comprehensive update to the <a href="#">State Transportation Improvement Program</a> was completed in September 2021. Particular attention was paid to providing accurate financial source and project funding information, including for all capital and operating costs. Full funding source information can be found in the <a href="#">FFY 2022-2031 STIP</a> on page I-14 (RIDOT) and 1-16 (RIPTA). Project funding information can be found in <a href="#">Section 3 of the FFY 2022-2031 STIP</a> .
	Recommendation	SPC, RIDOT, and RIPTA should revisit their agreement on the management and development of the TIP/STIP in consideration of the roles and responsibility, methodology, schedule, and amendment/administrative	The 2020 updated <a href="#">TriParty Agreement</a> clearly outlines the roles and responsibilities related to the management and development of the STIP.



		modification procedures.	Procedures to amend and modify the State Transportation Improvement Program (STIP) are specified in the <a href="#">2020 Memorandum of Agreement</a> .
	Recommendation	SPC, RIDOT, and RIPTA should review the representation of phases in the STIP for consistency, sufficient details on the definition of a phase, and implementation time frame associated with identified phases.	The <a href="#">FFY 2022-2023 STIP, Section 3 Project Tables</a> includes information on project phase and implementation time frames.
Public Participation	Recommendation	The Review Team recommends that SPC expand the contemporary public involvement strategies it employed during the development of the bicycle master plan to the development of all other plans.	Comment noted. Since development of the LRTP and BMP, the RIDSP has aggressively sought new and expanded avenues of public involvement, including employing new technologies to make public comment easier and more accessible to Rhode Island residents. These strategies have been documented in the <a href="#">2019 Public Participation Plan</a> .
	Recommendation	The Review Team recommends that SPC capture all public participation activities accurately and completely in the PPP, including outreach to low-income, minority, and LEP populations.	Public participation activities can be found in the <a href="#">Public Participation Plan</a> , specifically, in chapter VI. Participation Engagement Strategies and chapter VII. Addressing Continuing Challenges, Environmental Justice Populations and Other Traditionally Underserved Peoples.
	Recommendation	The Review Team recommends that SPC increase its efforts to measure the effectiveness of its public involvement strategies.	In the <a href="#">Public Participation Plan</a> RIDSP has increased its efforts to measure the effectiveness of its public involvement strategies by tracking: 1) public participation at workshops and public meetings; 2) number of web visitors to <a href="#">www.Planning.RI.Gov</a> ; 3) number of recipients that receive Planning Newsletter; 4) public comments offered on division publications; 5) number of recipients that receive public notices. More information is provided on pages 39 and 40 of the <a href="#">PPP</a> related to performance measures and data sources.
	Recommendation	The MPO should ensure all outreach activities, including nontraditional strategies, consistently address accessibility needs including Section 508, ADA, and LEP provisions.	Nontraditional strategies can be found in the <a href="#">Public Participation Plan</a> . Specifically, Chapter VI. Participation Engagement Strategies (pages 25-28) in the subsection titled <i>Participation</i>



			<p><i>Opportunities. Accessibility needs for the disabled and LEP can be found in chapter VII. Addressing Continuing Challenges, Environmental Justice Populations and Other Traditionally Underserved Peoples in the subsection titled Potential Methods of Engagement on page 30, which outlines enhancing accessibility for LEP populations, populations living with disabilities, minority communities, and low-income populations.</i></p>
	Recommendation	<p>The MPO should develop additional methods for reaching low-income populations and minority populations, including both direct engagement with these populations and engaging with community organizations and other grassroots groups.</p>	<p>Methods for reaching low-income populations and minority populations can be found in the <a href="#">Public Participation Plan</a>. Specifically, the <a href="#">PPP</a> chapter VII. Addressing Continuing Challenges, Environmental Justice Populations and Other Traditionally Underserved Peoples on pages 31 and 32. On page 32, the PPP also highlights Health Equity Zones as an additional forum for engagement and community outreach.</p>
Civil Rights	Recommendation	<p>The MPO should develop a new complaint form that will accurately capture the nondiscrimination statutes and protections. In addition, all complaints filed directly with the MPO should be forwarded and processed by RIDOT in accordance with the complaint procedures as required under 23 CFR 200.9(b)(3). Copies of these complaints should be sent to FHWA and FTA.</p>	<p>RIDSP has made available on its <a href="#">Title VI webpage</a> a <a href="#">Title VI Complaint Form (English) fillable pdf</a> and a web-based <a href="#">Title VI Complaint Form (equipped with Google Translate)</a>. As of December 20, 2022 no formal complaints have been filed.</p>
	Recommendation	<p>To be consistent with Title VI, the MPO should expand the data collection and analysis to specifically include White, Black or African American, American Indian &amp; Alaska Native, Asian and Hispanic or Latino. In addition, the analysis should compare the allocation of investments among the Title VI protected classes and conduct a burdens and benefits analysis.</p>	<p>In <a href="#">Section 5: Transportation Equity Benefit Analysis of the FFY 2022-2031 STIP</a>, the data collection and analysis was expanded to specifically include White, Black or African American, American Indian and Alaska Native, Asian and Hispanic or Latino. The analysis performed compared the allocation of investments among the Title VI protected classes and conducted a transit access analysis. Furthermore, in the <a href="#">LRTP: Moving Forward 2040, Appendix K: The Environmental Justice Analysis</a>, a benefits and burden analysis was</p>



			conducted for two key Title VI and Environmental Justice (EJ) transportation program areas, air quality and transit.
	Recommendation	The MPO is recommended to work with RIDOT to educate municipalities on their responsibilities under ADA and Section 504 to ensure that all programs, activities, and services under their jurisdiction are examined to identify barriers to access for persons with disabilities. With RIDOT's assistance, an ADA Transition Plan or Program Access Plan should be developed describes the steps to make their program areas accessible to persons with disabilities.	This ADA Transition Plan was drafted and put on file. Shortly after the document was finished, the Division's offices were relocated from a State-owned building to a privately leased and managed property. While the offices were relocated, public meetings of the TAC and SPC continue to be held within an ADA accessible building.  Staff are also trained to answer questions from municipalities concerning their responsibilities under ADA and Section 504 to reduce barriers to access for persons with disabilities.
	Recommendation	The MPO should develop a complete LEP plan.	The <a href="#">LEP Plan</a> was last updated in 2021.
List of Obligated Projects	Corrective Action	The MPO, RIDOT, and RIPTA must develop a listing of obligated projects on an annual basis. The roles and responsibilities for compiling and publishing the list should be documented to ensure that this federal requirement is met regardless of any changes in staffing over time.  A compliant annual list of obligated projects must be published within 90 days of the end of FY2018.	MPO has submitted an <a href="#">Obligation Report</a> annually since 2018 indicating where federal funds have been allocated for each FFY, within the required 90-day time frame.
Freight	Recommendation	The Review Team recommends RIDOT, SPC, and the FAC to coordinate in identifying the agency(ies) responsible for the development and implementation of the State Freight Plan and freight performance measures for Rhode Island, potentially in the Tri-Party agreement.	The <a href="#">Tri-Party Agreement</a> now includes provisions (page 3) that RIDSP, as the MPO, is responsible for the development and implementation of the State's Freight and Goods Movement Plan. On pages 11-13 of the <a href="#">Tri-Party</a> the shared responsibilities of RIDSP and RIDOT related to freight performance measures are outlined. RIDSP and RIDOT work jointly in the establishment and monitoring of performance measures relating to freight.





	Recommendation	The Review Team encourages the SPC, RIDOT, and the FAC to build professional freight capacity in the Region by seeking opportunities to bring in National Highway Institute courses on freight, attend the I-95 Corridor Coalition Freight Academy, conduct freight peer exchanges, tour freight facilities, and work with other states on freight planning.	In the Fall of 2020 RIDSP, together with FHWA's Resource Center led a virtual Freight & Land Use Seminar series for municipal planners that was well attended and included presentations from the FHWA Resource Center, RIDSP, and members of the RI Freight Advisory Committee. RIDSP and RIDOT has had four (4) Freight Academy graduates in the classes of 2012, 2014, 2015, 2019. RIDSP has led two <a href="#">municipal freight scans</a> in Providence and North Kingstown; organized a variety of tours at freight facilities including the Ports of Providence, Davisville, Galilee, warehouse, distribution, and large manufacturing facilities (Hope Global in Cumberland, Ocean State Job Lot D.C. in Quonset), airport cargo facilities. RIDSP also developed a <a href="#">RI Freight Finder online mapping application</a> . We had planned a series of tours relating to the food and beverage industries and their warehouses and logistics in early 2020+, unfortunately COVID-19 disrupted those plans and the ability to make future plans for tours .
	Recommendation	The Review Team encourages the SPC, RIDOT and the FAC to seek opportunities to convene with neighboring state to address freight issues and collaborate on freight opportunities that may benefit the movement of goods in the economic region.	In March of 2019 we invited former Massachusetts Department of Transportation's (MassDOT) Freight Program Manager Gabe Sherman to give a presentation at one of our quarterly Freight Advisory Committee meetings, held at T.F. Green International Airport, on the Massachusetts State Freight Plan and freight planning issues of interest to both MA and RI. Additionally, in April 2019 we had some discussions with former MassPort Senior Transportation Planner Laura Gilmore about a potential project we had considered at the time for our UPWP on Port resiliency business plans for port companies in RI. However, we eventually decided



			to set the idea aside to focus on some other freight planning initiatives ( <a href="#">Freight ITS Paper</a> , <a href="#">Port of Providence Truck Study</a> , <a href="#">Freight Truck Volume Q-D analysis</a> , etc...)
Congestion Management Process	Corrective Action	<p>The MPO must develop an up-to-date congestion management process.</p> <p>The CMP should be informing decision-making, including project selection, no later than the time the 2020 TIP is adopted.</p>	RIDSP developed its first data driven <a href="#">Congestion Management Process/Plan</a> in 2020 and continues to report on performance measures on an <a href="#">annual basis</a> relative to that plan.
Performance Based Planning and Programming	Recommendation	FHWA and FTA encourage the MPO, RIDOT, and RIPTA to continue collaborating on TPM, especially in establishing targets and addressing PBPP in the next tri-party agreement.	Collaboration between RIDSP/MPO, RIDOT, and RIPTA on FHWA and FTA TPM requirements is ongoing. The terms of this coordination are described in the <a href="#">Tri-Party Agreement</a> and the coordination is undertaken at the guidance of TPM target setting and reporting guidelines.
	Recommendation	FHWA/MPO/RIDOT should initiate recurring meetings to discuss the status and reporting requirements for PBPP and TAMP.	This process is ongoing as RIDSP and RIDOT meet on a weekly basis. RIDSP, RIDOT, and RIPTA meet monthly to discuss the STIP, implementation of the Transit Master Plan, and PBPP. Quarterly check-in meetings are held with DSP/RIDOT/RIPTA and our partners at FHWA/FTA, covering a wide range of topics.
	Recommendation	The MPO should follow through with including a task to modify the project selection criteria for the TIP so that it is aligned with the performance measures and targets identified in the MTP in the FY2019 UPWP as identified in their response to the on-site review advance questions.	The MPO is in the process of creating <a href="#">data-driven project selection criteria</a> backed by ESRI software for scoring, evaluating, and prioritizing STIP project proposals based on the different goal areas of the LRTP to assist in prioritizing and programming of projects that are aligned with the State's guiding plans.
	Recommendation	As performance measures continue to be required the MPO should educate the TAC and SPC on performance based/data driven planning and programming emphasizing their role in setting targets as a way to continue influencing the program.	The MPO regularly presents to both the TAC and SPC on various performance measures and in doing so provides background materials to help educate them on the performance-based planning approach and what is federally required for each plan. RIDSP has also added content on its <a href="#">website on performance based/data driven planning and programming</a> to better educate stakeholders and the public on



			the process and how it influences the program.
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## APPENDIX E – LIST OF ACRONYMS

**ADA:** Americans with Disabilities Act  
**AMPO:** Association of Metropolitan Planning Organizations  
**CAA:** Clean Air Act  
**CFR:** Code of Federal Regulations  
**CMP:** Congestion Management Process  
**CO:** Carbon Monoxide  
**DOT:** Department of Transportation  
**EJ:** Environmental Justice  
**FAST:** Fixing America’s Surface Transportation Act  
**FHWA:** Federal Highway Administration  
**FTA:** Federal Transit Administration  
**FY:** Fiscal Year  
**HSIP:** Highway Safety Improvement Program  
**ITS:** Intelligent Transportation Systems  
**LEP:** Limited-English-Proficiency  
**M&O:** Management and Operations  
**MAP-21:** Moving Ahead for Progress in the 21<sup>st</sup> Century  
**MPA:** Metropolitan Planning Area  
**MPO:** Metropolitan Planning Organization  
**MTP:** Metropolitan Transportation Plan  
**NAAQS:** National Ambient Air Quality Standards  
**NO<sub>2</sub>:** Nitrogen Dioxide  
**NOAA:** National Oceanic and Atmospheric Administration  
**NPMRDS:** National Performance Management Research Data Set  
**O<sub>3</sub>:** Ozone  
**PTASP:** Public Transportation Agency Safety Plan  
**PM<sub>10</sub> and PM<sub>2.5</sub>:** Particulate Matter  
**SHSP:** Strategic Highway Safety Plan  
**STIP:** State Transportation Improvement Program  
**TDM:** Travel Demand Management  
**TIP:** Transportation Improvement Program  
**TMA:** Transportation Management Area  
**U.S.C.:** United States Code  
**UPWP:** Unified Planning Work Program  
**USDOT:** United States Department of Transportation





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