

Rhode Island Transportation Decarbonization Advocates



July 30, 2025

Mason Perrone
Rhode Island Division of Statewide Planning
235 Promenade Street, Suite 230
Providence RI, 02908

RE: Comments on 2026-2035 State Transportation Improvement Program (STIP)

Dear Mr. Perrone,

‘Rhode Island Transportation Decarbonization Advocates’ (“RITDA”) is a coalition of organizations and advocates working to ensure that the state is reducing emissions from the transportation sector at a pace that will support the mandates in the Act on Climate. We respectfully submit the following comments on the [first draft of the State Transportation Improvement Program](#) (STIP) for Federal Fiscal Years (FFY) 2026-2035. The STIP presents a 10-year program for over \$10 billion in federal funding for transportation projects, with the state anticipating \$4 billion in funding for the initial four fiscally constrained years (2026-2029). This program document is the mechanism through which Rhode Island advances its vision for a multimodal transportation system, and we challenge our decisionmakers to invest in this future with purpose and transparency. Our transportation system has powerful implications not only for greenhouse gas (GHG) emissions reductions, but also for how we as Rhode Islanders move around our state safely, affordably, and efficiently.

ALIGN WITH LRTP:

The purpose of the STIP is to actualize the goals and reach the metrics outlined in the LRTP. As stated in Section 1 (page 4) of the draft 2026 STIP, “all projects in the STIP must be consistent

with the Long Range Transportation Plan (“LRTP”), Moving Forward 2050, and help implement the goals of the LRTP. The STIP represents the translation of recommendations from the LRTP into a shorter-term program of improvements.” Despite this claim, we believe there is a drastic misalignment between the LRTP’s goals and objectives and STIP Priority Areas. The summary of allocations by STIP Priority Area (Figure 2-3), as well as by mode, outlined in Figure 2-2, demonstrates an imbalanced program that triages and perpetuates the existing, highway and car-centric system, and does not proactively build the multimodal vision expressed in the LRTP. For example, a mere 7% is allocated for “Expanding Transportation Options” and 6% for “Multimodal Transportation Safety”, while 84% is allocated for “Asset Management”. When reviewing the share of STIP resources by mode, “Bicycle & Pedestrian” accounts for 10%, while “Transit” accounts for only 4%.

Further, the draft 2026 STIP references the LRTP adopted by the State Planning Council on December 10, 2020 - Moving Forward RI 2040 (“2020 LRTP”). The 2020 LRTP is currently being revised, with the Rhode Island Division of Statewide Planning (“Division”) conducting a breadth of community engagement activities. That this robust and targeted effort to engage the public on the limited update to the 2025 LRTP would *not* inform the 2026 STIP as well would be a significant missed opportunity. Certain members of RITDA have submitted comments to the draft 2025 LRTP and those comments are incorporated herein by reference. Accordingly, the 2026 STIP must reference and incorporate the provisions of the 2025 LRTP.

In the following sections, we – the Rhode Island Transportation Decarbonization Advocates (RITDA) – outline our top recommendations and propositions for the STIP.

- **DISCLOSE DATA-DRIVEN PROJECT EVALUATION PROCESS:**

The draft 2026 STIP does not currently provide guidance or any indication of the metrics by which the State of Rhode Island prioritizes and selects projects for federal funding, whether acting via the Division of Statewide Planning (“the Division”), the Rhode Island Department of Transportation (“RIDOT”) or the Rhode Island Public Transit Authority (“RIPTA”). As a result, there is no clarity around how the goals and objectives of the LRTP, state agencies, local communities, and other stakeholders are balanced. **The Division should be obligated to publicize details about the specific selection criteria used to make decisions on transportation projects as well as how much weight each criteria was given when making these decisions.**

Understanding the project prioritization strategies which inform the 2026 STIP is critical to transparency and accountability. We have heard that new projects, solicited from municipalities in late 2024, were reviewed for consistency with the LRTP. We urge the Division to offer transparency on this process. Further, as a living document, the ongoing review and evaluation of previously proposed projects must be incorporated into the prioritization process. All projects, not just newly proposed projects, should be assessed

for a range of LRTP considerations. Other factors given weight in the selection process, such as how long a project has been waiting for funding, should also be explicitly outlined.

In the absence of transparency around the project evaluation process and associated criteria, which objectively weighs a variety of goals and factors for prioritization, Rhode Island's STIP instead offers an opaque, imbalanced internal process which continues to erode trust and underinvest in projects that would truly advance safety, equity, and non-car modes of transportation. The State of Virginia's SMART SCALE prioritization process is a helpful example of an objective scoring process that evaluates transportation projects using key factors¹.

- **INCORPORATE EMISSION REDUCTION ANALYSIS:**

We are disappointed that the Rhode Island Department of Transportation ("RIDOT") analysis regarding carbon emissions reduction potential has not informed the 2026 STIP. Section 5 of the 2026 STIP goes to great length to outline the transportation conformity determination process which demonstrates the plan's compliance with the Clean Air Act and Transportation Conformity rule requirements for the 1997 Ozone NAAQS. However, while emissions analysis may not be a requirement of federal air quality compliance, it is a necessity of aligning the state's transportation planning with the mandates of the Act on Climate.

Further, the work to refine GHG modeling capabilities was explicitly funded in the EC4's FY 2025 Spending Plan, approved on October 7, 2024. RIDOT was awarded \$100,000 to quantify the emissions impacts of projects included in the STIP and LRTP, and model and analyze strategies to meet 2050 climate targets. With the development of the 2025 Climate Strategy, the update to the LRTP and the 2026 STIP, 2025 is a critical year for understanding the emissions impact of Rhode Island's transportation sector. The omission of this analysis is a missed opportunity to ensure that \$10 billion of federal funding in 2026-2035 begins to reduce emissions in the transportation sector.

The lack of transparency and public process surrounding RIDOT's emission reduction analysis remains a concern. RITDA requests that RIDOT release the emissions modeling for public review, potentially as a supplemental appendix separate from federal review of the 2026 STIP. Without the release of the emissions modeling, it is unclear how the state will sufficiently tackle reducing GHG emissions in the transportation sector and how this should inform the prioritization of 2026 STIP projects. RIDOT's 2023 Carbon Reduction Strategy failed to place the state on a pathway to meet the Act on Climate and in this

¹ Virginia Secretary of Transportation. *Smart Scale Website*. <https://smartscale.virginia.gov/>

strategy, RIDOT acknowledges that its existing programs do not move the needle on carbon reduction.

In RIDOT's 2024 Surface Transportation Decarbonization Roadmap, the largest proportion of emission reduction is attributed to Advanced Clean Cars II, with transit having a surprisingly limited role. Given the lack of progress and investment in the Transit Master Plan and the Bicycle Mobility Plan, we are concerned that the role of policies or actions which reduce vehicle miles traveled (VMTs) and shift modes is not appropriately accounted for in this modeling of emission reductions. In addition, federal level changes continue to threaten states' enforcement of Advanced Clean Cars II and Advanced Clean Trucks regulations and emission reductions attributed to the enforcement of those regulations may not be realized along the original timeline.

- **EMPHASIZE AS A PRIORITY THE IMPLEMENTATION OF THE TRANSIT MASTER PLAN AND BICYCLE MOBILITY PLAN:**

We recommend that the state-approved Transit Master Plan and Bicycle Mobility Plan are explicitly referenced and meaningfully incorporated into the 2026 STIP and that progress made on the goals outlined in those plans is indicated.

In the [June 2025 DRAFT STIP](#) section labeled 'STIP Investment Framework and Program Descriptions' beginning on p. 1-18 under 'RIPTA Programs' (p. 1-23), we recommend a sub-section highlighting the priority of implementing the state-approved Transit Master Plan (TMP), adopted in 2020. Currently, there is a section pertaining only to the High Capacity Transit Development, which is one element of the TMP. The entirety of the TMP calls for a significant increase in system-wide transit service frequency and span, which are key determinants of ridership and mode-shift from single-occupancy travel.

Also under 'STIP Investment Framework and Program Descriptions', beginning on p. 1-20 'RIDOT Programs', 'Active Transportation', we recommend a sub-section highlighting the priority of implementing the state-approved 'Bicycle Mobility Plan' (BMP), adopted in 2020. We understand from the ongoing update of the Long Range Transportation Plan (LRTP) that the BMP is 1.7% implemented as of 06/25. While less than 5% of RIDOT's budget is allotted for Active Transportation projects in the fiscally constrained years, the absence of bike and pedestrian infrastructure in the STIP misses an opportunity to achieve a more balanced mobility system.

We further recommend that for any state level plans such as the Transit Master Plan, Bicycle Mobility Plan, State Rail Plan, etc., there should be notation indicating percentage implemented as of the month and year (% implemented as of mm/yr) and

updated as the STIP is amended from time to time. We see this progress towards plan implementation as a critical performance measure to be integrated into the 2026 STIP.

- **ENHANCE SAFETY FOR PEDESTRIANS AND BICYCLISTS:**

We urge the Division to include stronger considerations for pedestrian and bicyclist safety. Starting on page 1-30, the “Performance Assessment: Highway Safety” section and subsequent notable line items describe inadequate actions to address safety of pedestrians and bicyclists. The subsection, “Intersection and Crosswalk Safety Improvements” describes pedestrians and bicyclists accounting for up to 33% of fatalities and serious injuries in Rhode Island, while only 2.3% of Rhode Islanders walk to work and 0.4% bike to work. Though this fatality percentage does not reflect commuting only, it is an insight into the disproportionate harm these road users face. With this context, it is disappointing to see the only objectives to reduce deaths and serious injuries within the “Intersection and Crosswalk Safety Improvements” section are “Reduce pedestrian exposure to vehicular traffic” and “Reduce vulnerable user crashes at intersections, along the roadway, and at mid-block crossings”.

In order to adhere to the STIP Priority Areas laid out on page 1-6, specifically, “Multimodal Transportation Safety” and “Expanding Transportation Options”, more thoughtful and proven countermeasures should be included to reduce fatalities and serious injuries – not just for bicyclists and pedestrians, but for all road users. It is well documented that by planning for and safeguarding pedestrians and cyclists, especially at intersections, *all* road users see better safety outcomes ². Dedicating safe facilities for bicyclists and pedestrians will also encourage people, who are able, to switch from driving to more sustainable, healthy, and safer modes of transportation.

At a minimum, the Division should list FHWA’s Proven Safety Countermeasures, such as “Bicycle Lanes”, “Rectangular Rapid Flashing Beacons”, “Road Diets”, and “Pedestrian Hybrid Beacons” as objectives in all STIP projects to reduce deaths and serious injuries. All of the FHWA’s Proven Safety Countermeasures should be considered in all new road improvements where pedestrian and bicycle traffic is present to help implement Complete Streets and move toward zero roadway deaths.

- **INVEST IN REDUCING VEHICLE MILES TRAVELLED AND MODE SHIFT:**

Achieving the requirements and mandates of the Act on Climate must be heavily weighted when setting transportation project prioritization strategies. Doing so requires a

² Marshall, W. E., & Ferencak, N. N. (2019). Why cities with high bicycling rates are safer for all road users. *Journal of Transportation & Health*, 13. <https://www.sciencedirect.com/science/article/abs/pii/S2214140518301488?via%3Dihub>

significant reduction in single use vehicle miles travelled, achieved through meaningful investments in mode shift. Page 1-29 of the 2026 STIP outlines “percent of non-single occupancy vehicle travel” and “total emissions reduction” as measures for STIP project inclusion, despite opting to exclude such measures from the plan. The LRTP, which envisions a multimodal transportation network and affordable transportation choices, further demands consideration of these strategies. Members of the RITDA offer the following comments on the 2026 STIP investments.

1. Flex Funding for RIPTA

- a. We recommend the state fully explore the possible options to flex federal formula funds to RIPTA. Several states do this regularly³. With limited sustainable funding sources and increasing costs to continue providing public transportation statewide, all funding sources should be on the table. Flexing funding to make meaningful progress on capital investments listed throughout the Transit Master Plan such as new buses, dedicated bus lanes, and high quality shelters, will improve the rider experience, increase the reliability of service, and incentivize more people to choose transit over driving. We specifically request information regarding the allocation of Carbon Reduction Program funding, as well as the share of the Highway Maintenance Fund which goes to RIPTA.

2. Integrate Dedicated Bus Lanes on Existing Highways and in Urban Settings

- a. Buses sitting in mixed traffic alongside single occupancy vehicles has a major detrimental impact on the performance and reliability of transit systems. We recommend exploring meaningful ways to reallocate existing roadway space for public transit and high occupancy vehicles, particularly during peak commuting times when volumes are heaviest. This shift can make commuting via public transit a more desirable option. Additionally, technology like transit priority signals on local roads can move transit vehicles more efficiently through crowded city streets where transit demand is often highest. High quality stations and shelters can increase confidence in the viability of transit as a safe and secure option.

3. Invest in Rail

- a. Rhody Express (approx. \$8M) is important for congestion mitigation in the near-term, but can be the foundation of a more robust statewide rail service that plays a key role in reducing GHG emissions. We recommend that the state implement this by using allocated funds and begin studying opportunities for extending the service to more of the state.

³ Richardson, H. (2022, November 29). *Want to use highway dollars for transit? These places already do.* TransitCenter. <https://transitcenter.org/want-to-use-highway-dollars-for-transit-these-places-already-do/>

- b. ‘Rhode Island-Boston Regional Rail’ is identified as a Regionally Significant Project for the 2026-2036 STIP. To mitigate pollution from diesel commuter trains and to improve service and reliability, the state should plan and fund electrification of non-electrified segments of the Northeast Corridor (NEC) within the state, which could benefit both instate Rhody Express service and eventual upgrade of MBTA rail service to Boston.

4. Add HOV Lane to Washington Bridge Rebuild Project

- a. The westbound portion of the Washington Bridge will be completely rebuilt at a cost of \$427 million (not including the cost of demolishing and removing the old westbound portion). This new westbound portion will have 5, rather than 4, lanes of traffic and has been designed to carry 80,000 vehicles every day for 100 years (the old westbound portion carried 96,000 vehicles every day).⁴ We recommend embedding a dedicated HOV lane for transit/carpool and faster emergency response times into this substantial investment into the new westbound portion of the Washington Bridge, as well as on the eastbound portion. A dedicated HOV lane will help ensure it is competitive for Rhode Islanders to choose higher capacity transit, and help to move the needle on reducing emissions in alignment with Act on Climate mandates.

CONCLUSION

Thank you for your consideration of these comments on the 2026 STIP, a document intended to be a vision for advancing Rhode Island’s transportation system. The above comments outline primary concerns from the RITDA on topics within the STIP such as greenhouse gas emissions and safe & affordable transportation throughout the state via all modes of transit, not just car-oriented travel. It is the hope of the RITDA that these comments will inform the final 2026 STIP and result in the release of named modeling documents.

Sincerely,

‘Rhode Island Transportation Decarbonization Advocates’

Richard Stang, Conservation Law Foundation

Dylan Giles, Providence Streets Coalition/Save RIPTA Coalition

Emily Koo, Acadia Center

Tina Munter, Green Energy Consumers Alliance

⁴ Sherman, E., Nesi, T., & Leslie, A. (2025, June 6). *Washington Bridge rebuild will cost \$427 million and take until 2028, McKee announces*. WPRI. <https://www.wpri.com/target-12/427m-to-rebuild-washington-bridge-by-november-2028-mckee-announces/>

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