

RIDOT Physical Alteration Permit Process and Access Management Consolidated Findings and Recommendations

Rhode Island Department of Administration

Statewide Planning Program

Rhode Island Department of Transportation

Funding provided
by



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



November 19, 2014

NOTICE TO READERS

THE VIEWS AND OPINIONS OF THIS DOCUMENT DO NOT REFLECT THOSE OF THE USDOT OR FHWA. THE FHWA MAKES NO CLAIMS, PROMISES OR GUARANTEES ABOUT THE ACCURACY, COMPLETENESS, OR ADEQUACY OF THE CONTENTS OF THIS DOCUMENT AND EXPRESSLY DISCLAIMS LIABILITY FOR ERRORS AND OMISSIONS IN THE CONTENTS.

RIDOT Physical Alteration Permit Process and Access Management

Consolidated Findings and Recommendations

INTRODUCTION

PURPOSE

Working within the structured and comprehensive framework and activities of the Congestion Management Process (CMP) and the Congestion Management Task Force (CMTF), the Rhode Island Statewide Planning Program (RISPP) along with the Rhode Island Department of Transportation (RIDOT) sought to improve and promote the implementation of access management at both the state and local level for transportation and land use planning. This effort emanates from goals and policies found in State Guide Plan Element's *Land Use 2025* and *Transportation 2035* (the State's long range transportation plan). The judicious institution of access management design into our state's roadways has potential benefits that include: improved safety, travel comfort and travel time for passenger and freight, improved pedestrian safety and access, and improved air quality. The efforts to promote and institute access management principles and best practices have also been recognized by FTA and FHWA in Statewide Planning's most recent its CMP and Unified planning Work program.

A key instrument for access management planning and implementation on both the state and local level is RIDOT's Physical Alteration Permit (PAP) application and review process. RIDOT administers the PAP process to support the rules and regulations concerning permission for use of state highway rights-of-way and all other State of RI property including: alterations to curbs, sidewalks, highway access, storm water disposal, construction, traffic signals, bike paths, rail lines transit/train stations, and signage. Unfortunately those familiar with the PAP process often find that there is frequent disconnect between the local coordination and RIDOT approval, occasional disconnects within RIDOT Design engineers, and disconnects between RIDOT Design and Maintenance, thereby resulting in missed opportunities to implement access management and smart growth solutions.

In an effort to improve the PAP application process and the channels of communication between local and state government regarding implementation of access management solutions, RISPP, along with the supportive participation of RIDOT, established an Access Management Task Force to guide the review and identification of specific areas of the PAP application and review process that could be improved. Through this review of the PAP, recommendations have been formulated for both RIDOT and the municipalities to improve the PAP application and review process at all levels. It is also the goal of these recommendations to produce a smoother, more transparent application and review process, and provide a better approach to access management.

ACCESS MANAGEMENT TASK FORCE

The Access Management Task Force was formed as a subcommittee of the Congestion Management Task Force (CMTF). The CMTF was formed to promote and implement the congestion management process (CMP) for the RI Metropolitan Transportation Management Area (TMA). The CMTF has met quarterly for several years and its membership is composed of: FHWA, several RIDOT divisions including the TMC, Design, Intermodal Planning, Construction, and Maintenance, RISPP, and Rhode Island Public Transit Authority (RIPTA). The Access Management Task Force is charged with promoting access management principles and best practices to achieve the goals and objectives of congestion management, mitigation and enhanced safety on the State's non controlled access roadways, principal arterials, and collectors. The Access Management Task Force identified the RIDOT Physical Alteration Permit application and process as a mechanism to introduce better access management practices on the State's roadways. The Access Management Task Force also encouraged the investigation of the PAP application and review process to identify areas that could be enhanced to provide better applicant user interface as well as efficiencies of review that would expedite total review time. The Access Management Task Force was composed of representatives from RIDOT, RISPP (staff to the MPO), RIPTA, RI Builders Association and the development community, Rhode Island Consulting Engineers, and municipal planners. The Task Force met three (4) times and at their May 29th 2014 meeting this PAP Report was approved and recommended for adoption by the Congestion Management Task Force. This final document was approved by the Congestion Management Task Force on 09/19/2014.

RIDOT INTERVIEWS

The RIDOT staff interview process was developed out of discussions emanating from the meetings of the Access Management Task Force and discussions between Statewide Planning and RIDOT Road Design. The interview process is also a common element of a work flow study and analysis used by other state agencies such as RIDEM for their freshwater wetlands permitting and the Colorado DOT when they examined their access permitting processes.

Several of RIDOT's engineers and special resource unit personnel were recommended by RIDOT's Chief Engineer for the staff interviews. It was through the interview process with RIDOT staff, where Statewide Planning learned the intricacies of the permit application and the different forms and paths through RIDOT and other state agencies an application may travel during its review.

PAP SURVEY

In order to obtain user and municipal government feedback on the PAP application process, a web based survey was developed and forwarded to municipal officials, consulting engineers, the building community, and private developers. Because the Physical Alteration Permit process has many different stakeholders, it was determined that a survey may prove useful in discovering common user feedback on the PAP application process.

The Physical Alteration Permit Survey was developed in cooperation with the Access Management Task Force. The survey was posted on Survey Monkey on September 14, 2012. An invitation to participate in the survey was emailed with a one page cover letter explaining the goals of the Access Management Task Force and improvements to the PAP application. The survey was distributed through the Rhode Island Chapter of the American Planning Association, the RI Builders Association; and the Statewide Planning Program. We received 31 responses, an approximate rate of 5%. Although the response rate was low, the analyses of the responses do provide some interesting results related to the goals of this committee. Some of the survey findings mirror those garnered from the interview phase of this project and have been placed into Findings and Recommendations throughout this report.

PAP REPORT OVERVIEW

This report is organized around the PAP application's components, process, and review structure. The findings summarize the feedback from RIDOT engineers, the Access Management Task Force and the survey. The recommendations consist of a compilation of RIDOT feedback Statewide Planning's research into the RIDOT PAP, and the practices of other state DOTs and local governments, and input received during the Access Management Task Force meetings. The findings are presented in the next section of this report and the recommendations are consolidated at the end.

CIRCULATION OF PAP APPLICATIONS

ACCEPTANCE OF PAP APPLICATION

Findings

- All PAP applications are accepted and processed by RIDOT Maintenance.
- It is estimated that between 1 and 7 permits are received per with variations by season.
- Maintenance receives a high volume of utility applications. As of December 1, 736 applications were submitted in 2014.
- The applications are date stamped and coded according to the acceptance date by Maintenance.

DISTRIBUTION OF PAP APPLICATIONS

Findings

- The typical transmittal time for the paper application files to move from Maintenance in Warwick to Design in Providence is 2 to 3 days. It may take an additional few days to make it to individual review personnel in Providence.
- There is a database used to trace PAP applications shared by the Maintenance Division and Design. The permission levels vary between the two units. This database was designed in-house using SQL Server, Access, and Visual Basic.

- Maintenance has indicated that they would be open to an enhanced shared database that permits a more interactive and open management process with Design engineers to track the application progress.
- Packages of several permits are bundled for transport by hand from the RIDOT office to the Historic Preservation and Heritage Commission (HPHC) for their review. This is done on an average of once a week.
- RIDOT engineers (the PAP application reviewing engineer) are assigned PAP applications by region according to where they currently have ongoing projects.
- A letter is sent by Design to the applicant with the name of the assigned managing engineer/contact however, Maintenance will still receive telephone calls inquiring about the permit status during Design's ongoing review.

APPLICATION REVIEW

GENERAL REVIEW

Findings

- It is difficult for applicants to determine if a PAP is even necessary because RIDOT does not have a single source of information that establishes roadway jurisdiction. Divisions use different maps and records to determine road jurisdiction.
- In Maintenance, State Road jurisdiction is determined using maps that are focused on road maintenance, particularly snow plowing. At the same time, the RIDOT Planning and Program Development, maintains a state road coverage GIS layer but it is not clear if or how this is used in the PAP application process. RIDOT Divisions are currently collaborating to attempt to create a single roadway jurisdictional coverage map.
- The Traffic Engineering Section uses mapping and records dating back to the 1960's to answer inquiries about roadway jurisdiction.
- The lack of one resource showing the roadway jurisdiction for the entire state is problematic for applicants, municipalities, the public, and RIDOT staff. Without this map it is difficult to consistently determine permit applicability, functional class, maintenance, and federal reporting requirements under MAP-21.
- The PAP application review is included along with regular duties at RIDOT.
- Student interns are employed seasonally to help with the PAP reviews.
- Concurrent reviews on State of Rhode Island regulatory permits are conducted on request from the applicant. This includes the RIDOT PAP along with other State of RI permits such as RIDEM wastewater and wetlands and CRMC assent applications.
- The review process is an iterative one in that the reviewing engineer may have questions for the applicant and the applicant must respond for the review to proceed. This process continues until the review is complete. The record of the review is maintained by the RIDOT design engineer. The

Maintenance Division sees copies of requests for additional information by the Design engineers and/or from the applicants engineer but Maintenance is generally not copied on the responses.

- After RIDOT has reviewed the application, a letter with comments is prepared. The applicant is given 30 days to respond to requests for additional information on the application. If the applicant does not respond within 30 days, RIDOT sends a second follow-up letter with an additional 30 days to respond. A total of 90 days is provided. It is problematic for RIDOT to extend the application beyond 90 days due to the work stream scheduling at RIDOT and the institutional freshness of the application’s engineering particularities. If not response is received after 90 days, the application is generally denied.
- There is no e-permit application available for the PAP application. A TRB national survey of curb-cut permitting indicated several states were moving towards instituting “e” permitting for their PAP.¹

APPLICATION FORM/PACKAGE

Findings

- The PAP application instruction package lacks an itemized checklist, which would assist applicants in developing and submitting a complete application per RIDOT requirements.
- The application may reach certain RIDOT review units in an incomplete or insufficient condition.
- Application requirements and project details are often scarce or missing all together.
- Deficient applications require additional time from RIDOT staff to obtain the necessary information from the applicant to be deemed a complete application.
- The mapping requirements for the PAP application are not sufficient for providing a complete review of the project site as a whole and in context with local and regional scale conditions. For example abutting properties, land use, context of the road system, the complete existing and proposed development of the subject parcel are not always included but would be beneficial to RIDOT’s review.

REDEVELOPMENT RELATED APPLICATIONS

Findings

- RIDOT reviews redevelopment related PAP applications.
- Such applications are generally not clearly identified as a change of use and the RIDOT staff reviewer has to read through the application in detail to determine if this is a new development, or a change of use of a building/property.

¹ NCHRP Synthesis 304. “Driveway Regulation Practices: A Synthesis of Highway Practice”. Transportation Research Board of the National Academies. 2002.

- This uncertainty requires added time and effort by staff to research and request additional information for the review.
 - It is often the consulting engineer operating on the authority of the owner who initiates a redevelopment related PAP application and not at the request of the municipal officials.
 - RIDOT does not clearly state specific changes in on-site conditions that require this type of application. The onus is upon the developer / hired professionals to initiate and apply or not apply for a new PAP.
 - Finally, the Road Design, Traffic Engineering, and Maintenance have different definitions of what constitutes a change of use on a site, and in what situations it should apply.
 - Maintenance often defines it by a change in commercial use that affects drainage, whereas Design may see it as a change in traffic generation. There is no definition or threshold in the PAP manual other than an expansion of traffic.
 - Maintenance may request traffic and drainage studies when reviewing a redevelopment related PAP application.

DESIGN REVIEW

Findings

- RIDOT Design often receives an inconsistent amount of information in PAP applications from applicants. Some applications come with attachments from the applicant's permit submissions that are needed for other agency's review, such as wetlands permitting for RIDEM. In other cases Design review engineers do not receive enough information about project details to make a recommendation. This presents a problem when RIDOT staff needs to research and track down the additional information that may affect their recommendation.
- RIDOT Design engineers' expectation as to what should be included within the PAP application varies from engineer to engineer.
- Through the interview process it was discovered that access management principles are not considered by all Design engineers in the PAP application review.
- It is believed by some engineers that such policy is the responsibility of the Managing/Chief engineers of RIDOT to inject a larger perspective into the corridor or the road on which the application for access is located. For example, if there is an impact to the roadway or corridor beyond the immediate project access to the R-O-W, they typically defer any findings or recommendations to the Managing/Chief Engineer.
- Without a clear access management policy and department-wide practice, benefits from this proven traffic management tool will not be realized, and can be easily overlooked.

MAINTENANCE REVIEW

Findings

- After the PAP application is first received at Maintenance, verification of State road jurisdiction is done using snow plow routes to determine jurisdiction. This process differs from RIDOT Design.

- The Maintenance review of PAP applications is principally focused on drainage and the long-term maintenance of structures that connect with the State right of way.
- Maintenance Division conducts field inspections to check on the PAP site once the work is complete. The fact that this field inspection takes place is not general knowledge among all RIDOT offices involved in PAP application reviews.

TRAFFIC REVIEW

Findings

- A PAP application located at a signal or an application for a traffic signal (which is considered a PAP application) is reviewed by the Traffic Engineering Section. Traffic Engineering also reviews any traffic studies that may be submitted with a PAP application. Traffic's review is typically focused on the signal warrant analysis, trip generation and type, turning movements and delay, and level of service. For new driveways accessing a functional area of an existing signalized intersection, Traffic Engineering will look at how the new access functions with the existing travel patterns or traffic light and what impacts are possible to the overall operation of the intersection. Traffic's scope of review of PAP applications and related engineering documents is not general knowledge within RIDOT Road Design.
- Traffic Engineering receives requests from the public on verification of state road jurisdiction at least once a month. Traffic uses a combination of old state road mapping, R.I. General Assembly bills dating back several years to several decades, and RIDOT records and logs detailing work authorizations to determine roadway jurisdiction.
- Traffic engineering voiced some support for jurisdiction by functional class.
- It is the opinion of some engineers within the Traffic Engineering Section that there is very little use of modern access management practices by RIDOT.
- Traffic also feels there is a lack of coordination with the municipalities regarding State PAP access policy and local planning objectives. If this could be better addressed in the PAP application/ municipal planning phase it would result in beneficial land use decisions.

RIDOT CULTURAL RESOURCES UNIT/HPHC REVIEW

Findings

- The spectrum of PAP applications HPHC reviews is extensive. It includes almost all activity within the RIDOT right of way for any potential impacts to historical resources on the applicant's property.
- At one time RIDOT conducted the historical review internally then transmitted findings to HPHC for concurrence. This proved too time-consuming for RIDOT so the practice was dropped.
- The majority of applications receive a no impact finding from HPHC. RIDOT Cultural Resources Unit believes that HPHC turns their reviews around in less than 30 days for most applications.
- The RIHPHC review does not appear to contribute a significant time delay to the PAP permit processing. However there are not solid numbers to support this conclusion.

- It appears that the development of a new programmatic agreement between RIDOT and HPHC for internal RIDOT review of PAP applications for impact on HPHC regulatory/register properties will not improve the PAP review process time. In the opinion of RIDOT’s Cultural Resources Unit, the review time will be shifted to RIDOT as opposed to HPHC. In addition, HPHC would still have to review and concur with RIDOT staff findings and sign-off per their statutory authority found in the Antiquities Act of Rhode Island, Title 42, Chapter 42-45.1 and the “Procedures for Registration and Protection of Historic properties of the Rhode Island Historical Preservation Commission” adopted October 14, 1987.

APPLICATION DECISION

APPLICATION APPROVAL

Findings

- The reviewing engineer in Design prepares the recommendation package for approval or denial and that package is sent to Design’s Chief Managing Engineer and then to Maintenance.
- As part of the PAP application approval process, Maintenance performs a check with other state agencies (RIDEM and CRMC) to see if the applicant has pending permit applications with these agencies. This check is accomplished by Maintenance placing a telephone call to the applicant and asking them if they have any other pending state permits for this property. If there are other State or Federal permits pending as part of the project, RIDOT Maintenance will not issue an approved PAP unless the other agencies’ permits are approved. There is currently no question on the application itself that requires the applicant to disclose other regulatory permits that are being applied for or have been received or denied.
- Both the RIDOT Chief Engineer and the Administrator of Highway and Bridge Maintenance sign off on all PAP applications.
- Currently an approved PAP application is valid for 1 year. Extensions up to 3 years may be requested.
- There are conflicting responses within RIDOT units on review and approval time for a PAP. Design engineers have stated that a review can be as quick as a few weeks. Cultural Resources complete the review in an average of 30 days. However, according to Maintenance the average turn-around time on a PAP review is 3 months. Some larger more complex projects have required longer reviews. Maintenance is the office that receives the application first and is the last to sign-off on it.

APPLICATION DENIAL AND APPEAL PROCESS

Findings

- There is not a separate section in the PAP manual with written standards for denial of PAP application.
- The applicant is notified of a denial in a letter that is sent by mail.

- The current PAP application appeal process for a denial consists solely of a letter from the applicant to the RIDOT Director.
- The PAP manual does state goals and principals in an introduction that may form the basis of a more formal denial/appeal process. Some other state DOTs have a formal denial and appeal process in their access permitting rules and regulations.

PAP APPLICATION MODIFICATIONS

Findings

- RIDOT Design sometimes receives requests for PAP modifications for applications that have already been approved. This request to modify an existing PAP happens on an infrequent basis. The ability to request a modification to an existing PAP or one that that has already been submitted for review and approval is not common knowledge among applicants and municipalities.
- If it is a large scale change to the existing permit conditions it will be considered by Design as a new PAP application.
- Maintenance does not see PAPs come back for modification requests.
- The PAP Manual does not contain written instructions or outline the process for modification of an approved/existing PAP.
- There is a misperception that the PAP is locked in at first approval.
- All applicants may request modifications to their approved PAP. There are no additional charges and changes may be submitted directly to the Design Section at RIDOT for expedited turn around.

APPLICATION FEES AND BONDING

Findings

- Maintenance requires a surety bond for completion of construction work associated with PAP permit.
- Phasing of large scale developments has required RIDOT Maintenance to phase their PAP application review and require multiple surety bonds.
- The bond or bonds are released upon project completion and inspection by Maintenance.
- Maintenance would like to revise their PAP application fee structure to better reflect the project size and limit the ability for an applicant to have a customized fee structure based on the unique circumstances and phasing of the proposed development.
- Fees are not currently charged for utility applications. Utility PAPs make use of the state roadway, conduct frequent and sometimes extensive work within the right-of-way, which can often be disruptive to road operations and its' physical conditions, and constitute a large percentage of RIDOT staff review time for PAP applications.

MUNICIPAL PROCESS

MUNICIPAL ACKNOWLEDGEMENT OF PAP

Findings

- If a PAP application involves more than one city or town, RIDOT requires a letter of acknowledgement from each municipality.
- There is a letter required in the PAP application from the municipality acknowledging awareness of the project but does not indicate or require any local input/review.
- A RIDOT reviewing engineer has no confirmation that the submitted application and plans are the same as what was given to a municipal representative for a signature in the acknowledgement letter.
- RIDOT has little to no contact with municipal officials regarding PAP approvals.
- Conceptual designs are reviewed by RIDOT and meetings are held on request of the applicant. The municipality is not notified of such meeting and is not provided with a record of the meeting.

MUNICIPAL REVIEW PROCESS/INPUT

Findings

- Respondents to the online survey and feedback from the Access Management Task Force indicated the importance and need for improved coordination and communication between RIDOT and municipal staff during the PAP permitting process. It was revealed in the survey that this communication is not happening on a consistent basis.
- Similarly, the importance of trained municipal staff and stakeholder education of the PAP application and review process was emphasized by survey respondents and RIDOT engineers. This is needed by RIDOT and municipal staff but also includes consultants or developers frequently engaging in PAP regulation processes.
- Lack of state and municipal coordination can undermine or result in missed opportunities for congestion mitigation measures, access management, and safety improvements in both current and future regulatory programs. It can also cause unnecessary frustration for PAP applicants.
- It was discovered from both the Access Management Task Force meetings and from the online survey responses that the designated municipal RIDOT PAP point of contact varies from municipality to municipality. Even though the RIDOT PAP manual identifies the Building Official as the designated point of contact within the municipality, it appears that this varies within the cities and towns in actual practice. Almost 62 percent of the time the recipient of the PAP application is someone other than the Building Official.
- According to the RI Land Development and Subdivision Review Enabling Act (Title 45-23), master plans require the proposed design concept and public improvements. This includes the consideration of the need for a RIDOT PAP. Initial comments must be solicited from state agencies, as appropriate, including the department of transportation. Once the application is certified

complete the planning board has 120 days to review and render a decision; approval as submitted, approve with changes and/or conditions, or deny the application.

- On some master plan applications brought before local boards, the applicant has already applied for and received their PAP or a conditional approval from RIDOT. This is used to pressure the local boards into accepting the master plan as presented with the permitted access design.
- According to the Land Development and Subdivision Review Enabling Act, preliminary plans require: engineering plans depicting the existing site conditions, engineering plans depicting the proposed development project, a perimeter survey, and all permits required by state or federal agencies prior to commencement of construction; including connections to state roads. At commencement of the preliminary plan review phase, the administrative officer shall solicit written comments and/or approvals of the department of public works, the city or town engineer, the city or town solicitor, other local government departments, commissions, or authorities as appropriate. This includes comments on all permits applied for and required for the plan.
- Some developers will state before the board that they cannot modify the PAP because RIDOT has already approved it. This is not true. All applicants may request modifications to their approved PAPs. There are no additional charges, and changes may be submitted directly to the Design Section at RIDOT for an expedited review.
- According to the Land Development and Subdivision Review Enabling Act, the final plans require all material required by the planning board when the application was given preliminary approval. This may include changes to the PAP.

RECOMMENDATIONS

As urbanized areas expand and principal arterials became more congested, it is necessary to manage all elements influencing principal arterial efficiency. Growing demands for highway access are making it increasingly clear that curb-cuts, and the developments they serve, are resulting in cumulative adverse impacts on the safety and efficiency of Rhode Island's principal arterials. These cumulative impacts are not adequately addressed through traditional access permitting both at the state and municipal level.

The following recommendations were developed through consultations with the Access Management Task Force over the course of 4 meetings. In addition, Statewide Planning met with RIDOT several times to review the findings and recommendations of this report. The recommendations were also developed by consulting professional peer reviewed publications on best management practices of access management applied in the field of traffic engineering and planning.

PAP APPLICATION AND REVIEW PROCESS

1. Allow for an online PAP application process. A TRB national survey of curb-cut permitting indicated several state DOTs were moving in this direction for their PAP application reviews. Such a system should have the following advantages:

- Design/Maintenance Linked Database –One single PAP application database available to all RIDOT divisions to track and update the PAP simultaneously. This database would provide updated information useful to the tracking and management of all PAP applications. The database should also enable administrative elements of the PAP review process to proceed quicker. This database could include time stamping and location of the permit with the reviewing engineer /department. This database could become the foundation for an on-line tracking system.
 - Online Application Form – The PAP application form should be made available on RIDOT’s website as a fillable PDF form. This PDF form can then be printed by the applicant and submitted with the associated plans to RIDOT.
 - Online Tracking – RIDOT should provide an online tracking portal for applicants’ to check the status of their PAP applications. This online tracking tool would provide added transparency to the public and would help to reduce telephone and email inquiries to RIDOT regarding PAP permit status. The online tracking tool should contain contact information for the RIDOT staff member currently reviewing the application. The online tracking should also include bonding and inspection status.
2. Make accommodations with RIDOT Design for an optional pre-application review available for the applicant, hired professionals, and other review agencies prior to the formal PAP application submittal to RIDOT, similar to the meetings suggested as part of Every Day Counts to expedite project delivery. The option to request a pre-application meeting should be added to the PAP Guidance Manual. A pre-application meeting has the potential to result in a better and more complete PAP application and review process for RIDOT. Municipal officials should also be invited to conceptual design meetings between RIDOT and applicants.

Another possible alternative might be to establish thresholds (e.g., based on functional class, land use, Square Feet of development, etc.) for when a pre-application meeting with municipal representatives is required.

3. Avoid bundling of PAP applications for review. To reduce overall review time, applications should be transmitted to the next review unit as soon as the current unit’s review is complete.
4. Recommendations from 2014 Highway Functional Classification and National Highway System (NHS) updates could be used to commence the development of a roadway jurisdiction map. This would become the official roadway jurisdiction map for staff and public use, and made available on the Statewide Planning, RIDOT and RIGIS websites.
5. Adopt an application package checklist to assist both the applicant and reviewers. The proposed application check list should contain the following additional information:
- Mapping requirements that include a clear locus map and a USGS Quadrangle map of the project.

- Municipal official's signature on the form acknowledging receipt of plans and application (see # 7 item recommended below).
6. Provide an entry on the PAP application form to list other pending permit applications with Federal, State or Municipal government agencies related to the specific property subject to the PAP application. This will aid the RIDOT engineer in the review by revealing other possible impacts to the both the natural and built environment other than the road system.
 7. Develop a standardized municipal review form for the PAP application with fields for comments from the local planning, zoning, and engineering offices. This new form would be a one page, but multifaceted municipal review acknowledgement document that would be a stand-alone form in the PAP application. This municipal form would replace the current letter of municipal acknowledgement. A completed and signed copy of this form should be required as part of a complete PAP application package to RIDOT.
 8. Adopt a revised PAP application form in a fillable PDF formant that contains some additional information that would enhance review. This enhanced PAP application form will include the following:
 - A section with boxes to check off on the PAP application form that is more specific to the applicant's proposal such as change of use, signage, drainage, etc.
 - Section requesting additional details such as functional class, land use, etc.
 9. Adopt a new standard and more detailed definition for a new class of PAP called "Change of Use" for RIDOT Maintenance and Design's review. Include this in the PAP Manual.
 10. A reexamination of the PAP application fees should be conducted. Statewide Planning will work with RIDOT to propose an updated fee structure including a fee for utility permits.
 - A possible option for signal PAPs might include placing the maintenance responsibility for such signals on another party (e.g., the City/Town) or at least charge a recurring fee for the maintenance of the signal.
 11. RIDOT Maintenance should review PAP application modifications, not just the Design Section, because the changes could impact to the drainage systems that Maintenance maintains.
 12. Conduct interviews with RIHPHC staff for their input on how to improve the historic impact review process.
 13. Track the time spent on PAP application review for each phase of the review, including RIHPHC, to identify delays or inefficiencies in the process.
 14. Review of RIHPC jurisdiction over PAPs to find opportunities for excluding certain uses from review.

15. Where appropriate, a PAP should include the existing volume and circulation and other conditions of permit approval. RIDOT should reserve the right to require submission of a new PAP application if the conditions of the approved permit have changed.
16. The following standard language should be inserted in all approvals to clarify the permittee's responsibility.

It is the responsibility of the property owner or permittee to ensure that the use of the access to the property is not in violation of the permit terms and conditions. The terms and conditions of any permit are binding upon all assigns, successors-in-interest, heirs and occupants. Any significant changes in the use of the property must be presented to the Department to determine if a new access permit and/or modification to the access is required.
17. RIDOT and Statewide Planning should consider establishing a proactive corridor management program by developing a priority list of roads under state jurisdiction that should be subject to access management best practices. RIDOT and Statewide Planning should continue to coordinate on regional corridor planning transportation studies similar to the Aquidneck Island Transportation Study as a mechanism to identify, educate, and apply better access management strategies and solutions.
18. Prior to disposition, all RIDOT property should be examined for potential access management opportunities. Continue to review right of way requests through the RIDOT Land Sales Committee and the State Properties Committee for access management potential.

PAP MANUAL

19. Access management best practices and design should be incorporated into the RIDOT PAP Manual, (2005). RIDOT Highway Design Manual (2008), and the RIDOT Traffic Design Manual (2004). These best practices include: cross access between developments, shared parking scenarios, increased use of secondary roads, frontage or service roads, prohibiting access within the functional area of intersections, and appropriate driveway spacing and signal spacing.
20. Add a section in the PAP Manual outlining the process for modifying of an existing PAP permit. This new section would benefit both applicant and municipal officials by making it clear that such a process exists and that a new permit application is often not necessary. It would also facilitate a rapid response to additional changes on an already approved permit.
21. Provide a clear and legally defensible basis for PAP application denial and an appeal process in the PAP Manual. The criteria may include:
 - Interest and safety of the public
 - Recognized engineering and construction standards
 - Control of storm-water runoff

- Safe condition and integrity of state roadway
- Non-responsiveness of the application

22. Consider adding regulatory controls to allow for the following: denial or closure of direct access when alternative access to a secondary roadway is available, permit revocation for failure to construct, maintain, or use the access consistent with the terms and conditions of approved permit.

MUNICIPAL COORDINATION

23. Allow municipal officials to initiate a request to review an existing PAP by RIDOT based on changes to a parcel.

24. Develop an informational brochure on the PAP application process and make it available at municipal planning and engineering departments to help educate applicants on the PAP process.

25. Conduct interviews with municipal planners on the PAP application process. Solicit input on how to improve municipal and state review process in the following areas:

- Change of use permits
- Change of ownership
- Zoning, land development plans, subdivision applications, and building permits
- Access management best practices.
- Development of a access management model ordinance
- Potential State proactive corridor management program
- Municipal departmental distribution/circulation of PAP applications)
- Other opportunities for improved State and Local Coordination

26. Develop a recommended municipal circulation procedure for PAP applications to provide for more appropriate review. The planning department staff is recommended as the primary point of municipal contact for PAP review and would coordinate the internal distribution of PAP applications. In the absence of a planner, an engineer or public works director may be appropriate.

27. Coinciding with RIDOT's review, municipalities should be given 30 days to provide comments to RIDOT regarding the specific permit application. The comment period would coincide with RIDOT's review so as not to add any additional time to the application review.

28. Develop an access management model ordinance for the municipalities to incorporate into their regulations to promote better access management solutions.

EDUCATIONAL INITIATIVES

29. With the introduction of the enhanced application form, initiate training and education for those accepting PAPs to check for completeness prior to accepting applications.

30. Educate the RIDOT staff on the PAP process from application acceptance to field inspection and final approval so they have knowledge of the entire process.
31. Develop educational programs designed to assist in implementing access management principles. The target audiences for the programs may include RIDOT, Statewide Planning, municipal officials, consulting engineers, and developers. An initial training opportunity could be the National Highway Institutes "Access Management Location and Design".