



U.S. Department
of Transportation

Transportation Management Area Planning Certification Review

Federal Highway
Administration

Federal Transit
Administration

Providence, RI Transportation Management Area



April 2018

Final Report





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1.0 EXECUTIVE SUMMARY

On February 21-22, 2018, the Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) conducted the certification review of the transportation planning process for the Providence urbanized area. 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. As a result of this review, FHWA and FTA are certifying the transportation planning process conducted by the Rhode Island Department of Transportation (RIDOT), the State Planning Council (SPC)- the designated Metropolitan Planning Organization (MPO), and the Rhode Island Public Transit Authority (RIPTA) subject to addressing the corrective actions identified in this report. There are also recommendations in this report that warrant close attention and follow-up, as well as areas that the MPO is performing very well in that are to be commended.

Review Area	Corrective Actions/ Recommendations/ Commendations	Finding	Resolution Due Date
MPO Structure and Agreements	Corrective Action	The MPO, RIDOT, and RIPTA must develop written agreement(s) that fulfill federal requirements.	A compliant written agreement must be endorsed by May 1, 2019.
	Corrective Action	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.	Documented procedures must in place by May 1, 2019.
	Recommendation	Inclusion of local officials and major modes of transportation should be implemented to the maximum extent possible.	
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.	
	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.	



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.	
	Recommendation	The MPO should develop its performance measures spreadsheet in greater specificity, giving transit its own section.	
	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.	
	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.	
Transportation Improvement Program	Commendation	SPC developed, in-house, an online TIP/STIP mapper with a database to quickly access formatted reports and information including locations and scoping for each project through MS Access and GIS. The TIP/STIP also includes tagging features to easily identify projects programmed where it relates to sea-level rise, performance measures, and their ADA transition plan. These are good practices and will assist them as they transition to Performance Based Planning and Programming.	
	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.	
	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 modification procedures.	
	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.	
Public Participation	Commendation	The MPO is using contemporary, innovative public involvement strategies, including crowdsourced maps and pop-up outreach.	



	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.	
	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.	
	Recommendation	The Review Team recommends that SPC increase its efforts to measure the effectiveness of its public involvement strategies.	
	Recommendation	The MPO should ensure all outreach activities, including nontraditional strategies, consistently address accessibility needs including Section 508, ADA, and LEP provisions.	
	Recommendation	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.	
Civil Rights	Recommendation	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.	
	Recommendation	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 & 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.	
	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.	
	Recommendation	The MPO should develop a complete LEP plan.	



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 FY 2018.
Freight	Commendation	RIDOT, SPC, and URI are commended for their part in hosting the FHWA Freight and the Economy Northeast Megaregion Workshop in August 2017 in the City of Providence which was well attended by all the New England states, New York, New Jersey. RIDOT Director, COO, and SPC's Planning Director providing opening remarks and leadership on a session in the management of transportation assets, identifying performance gaps, and investment strategies.	
	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.	
	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.	
	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.	
Congestion Management Process	Corrective Action	The MPO must develop an up to date congestion management process.	The CMP should be informing decision-making, including project selection, no later than the time the 2020 TIP is adopted.



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.	
	Recommendation	FHWA/MPO/RIDOT should initiate recurring meetings to discuss the status and reporting requirements for PBPP and TAMP.	
	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 FY 2019 UPWP as identified in their response to the on-site review advance questions.	
	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.	

Details of the certification findings for each of the above items are contained in this report.



2.0 INTRODUCTION

Metropolitan planning organizations (MPOs) are required by federal law to conduct the metropolitan transportation planning process according to the requirements of 23 United States Code (U.S.C.) 134 as amended by the Fixing America's Surface Transportation (FAST) Act, signed into law on December 4, 2015. On May 27, 2016, the United States Department of Transportation (U.S. DOT) updated the Statewide and Metropolitan Planning Final Rule, which sets forth federal requirements for the transportation planning process. These requirements are found in 23 Code of Federal Regulation (CFR) Part 450, the metropolitan planning regulations, and are closely tied with the Clean Air Act Amendments of 1990 through the U.S. Environmental Protection Agency's (EPA) Air Quality Conformity Regulations.

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. The Review Team, comprised of FHWA and FTA officials, jointly evaluates the transportation planning process conducted in each TMA, defined as an urbanized area with a population over 200,000. This review assesses the extent to which each MPO's planning process meets the metropolitan planning regulations and, where applicable, EPA's Air Quality Conformity laws. Certification reviews generally consist of three primary activities: a site visit, a desk review of planning products, and preparation of a Certification Review Report that summarizes the review and offers findings. Public input is also sought as part of the review.

The certification review covers the transportation planning process conducted cooperatively by the MPO, State, and public transportation operators. The State Planning Council (SPC) is the designated MPO for the Providence urbanized area. RIDOT is the responsible State agency, and RIPTA is the responsible public transportation operator. Current membership of the MPO consists of 27 members representing a range of interests including state and local governments. The metropolitan planning area includes all of Rhode Island, with the City of Providence as the largest population center.

The topics of a certification review include compliance with federal laws and regulations, the challenges and successes of the planning process, and the cooperative relationship among the MPO, the public, and other transportation planning stakeholders. The certification review process is only one of several methods used to assess the quality of the metropolitan planning process and compliance with applicable statutes and regulations. Other opportunities for review include routine oversight activities such as attendance at meetings, day-to-day interactions, review and approval of work products, and coordination with the MPO on prior certification review recommendations. The results of these other processes are considered in the Certification Review process.



Upon completion of the review and evaluation, FHWA and FTA must either:

1. Certify that the transportation planning process meets the requirements of 23 United States Code (U.S.C.) 134, 49 U.S.C. 5303, and other associated federal laws;
2. Certify that the transportation planning process substantially meets federal requirements with conditions tied to resolution of specific corrective actions;
3. Certify the transportation planning process with conditions and additional project and program restrictions; or,
4. Not certify the planning process and withhold funds if the process does not meet federal requirements.

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

On January 12, 2018, this review was initiated with a formal notice to the MPO. Also on January 12, 2018, a list of requested advance materials was sent. These materials included the major Continuing, Comprehensive, Cooperative (3C) planning documents, planning agreements, bylaws, and the Title VI Plan. After a comprehensive desk review, the Review Team sent follow-up questions to the MPO on February 7, 2018. The responses received assisted the Review Team in formulating its agenda for the on-site review conducted on February 21 & 22, 2018.

During the on-site review, the Review Team engaged the MPO, RIDOT, and RIPTA staff in a productive and wide-ranging discussion. All who were present participated in meaningful dialog and readily provided information about the planning process. During the Transportation Advisory Committee (TAC) meeting on February 22, 2018, the Review Team conducted a public meeting that included a brief presentation on the federal planning certification review process. The public was also offered the opportunity to submit written comments, and, additionally, a public input form was circulated via the MPO's TAC email list and posted on the website.



3.2 Organization of This Report

This certification review report is organized around key transportation planning topic areas. Each report section presents the legal and regulatory basis for the review topic area, summarizes the observations of the Review Team, and lists the team's findings. 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 all 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 requirements.



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 MPA.

4.1.2 Observations

MPO Official Name - State Planning Council (SPC)

Year Founded - RIGL 42-11-10 originally passed in 1978

Organizational Type - The SPC is a statewide MPO that operates independently of the State of Rhode Island as an MPO as directed by state law RIGL 42-11-10. The RI Department of Administration, Division of Planning serves as the principal staff agency to the State Planning Council.

Current Members -

Chair, Rhode Island Department of Administration, Director

Vice Chair, Governor's Office

Secretary, Rhode Island Division of Planning, Associate Director

Rhode Island Department of Transportation, Director

Rhode Island League of Cities and Towns, President's Designee

Rhode Island League of Cities & Towns, Local Government Representative

Rhode Island Department of Environmental Management, Director

Representative of Nonprofit Housing

Public member

Rhode Island League of Cities and Towns, Executive Director

Executive Director, Rhode Island Housing

Rhode Island Coastal Resources Management Council

Rhode Island Office of Energy Resources, Executive Director

Small Business Representative

Rhode Island Department of Administration, Budget Office

City of Providence - Department of Planning and Development, Director

Governor's Designee

RI Public Transit Authority

Secretary of Commerce

Public Member



Rhode Island Department of Health, Director
Employer with more than 50 Employees
Environmental Advocate

The Transportation Advisory Committee (TAC) advises the SPC on transportation planning and encourages public involvement in the process. The TAC reviews and provides input into the transportation planning documents that are the responsibility of the State Planning Council (notably the long-range Ground Transportation Plan and Transportation Improvement Program). Membership of the TAC is governed by the Rules and Standards of the State Planning Council which states that the TAC shall consist of one representative each from RIPTA, RIDOT, the RI Department of Environmental Management, and the RI Commerce Corporation. The Narragansett Indian Tribe is also represented on the TAC. City of Warwick, City of Providence, City of East Providence, and Town of Burrillville are represented. Four municipalities are represented out of 39. RI Trucking Association and Rhode Island Airport Corporation and Bike Newport are represented.

Rhode Island's cities and towns may adopt one of four different forms of government: council–manager, mayor–council, town council–town meeting, or administrator–council. With only four of the thirty-nine municipalities represented, SPC includes minimal inclusion of local government representatives such as mayors or council members as part of the transportation decisionmaking process.

The tri-party agreement between RIDOT, RIPTA and RIDOA SPC was adopted in 2005. The tri-party agreement is written as an agreement between SPC and RIDOT addressing RIPTA's responsibilities.

4.1.3 Findings

Corrective Action: The MPO, RIDOT, and RIPTA must develop written agreement(s) that fulfill federal requirements.

The MPO, RIDOT, and RIPTA shall cooperatively determine their mutual responsibilities in carrying out the metropolitan transportation planning process.

The MPO, RIDOT, and RIPTA must update the agreement 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.



The MPO, RIDOT, and RIPTA must ensure that the written agreement(s) includes specific provisions for the development of financial plans that support the metropolitan transportation plan and the annual listing of obligated projects.

The MPO, RIDOT, and RIPTA should periodically review and update the agreement, as appropriate, to reflect effective changes.

Schedule for Process Improvement: *A compliant written agreement must be endorsed by May 1, 2019.*

Corrective Action: 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.

Federal Regulations require the involvement of local officials and government agencies in the planning process. During the public hearing for the planning certification review we received input from a number of local government representatives who questioned how they can be involved in transportation decision-making and did not understand the role of the MPO. The FHWA division office also received numerous inquiries from local governments about the process for programming federal transportation funds. Thus, the Rhode Island MPO must develop a process to improve involvement by local elected officials and local government agencies in the planning process. 23 CFR 450.316(e) states that “MPOs shall, to the extent practicable, develop a documented process(es) that outlines roles, responsibilities, and key decision points for consulting with other governments and agencies, as defined in paragraphs (b), (c), and (d) of this section, which may be included in the agreement(s) developed under §450.314.”

Schedule for Process Improvement: *Documented procedures must in place by May 1, 2019.*

Recommendation: Inclusion of local officials and major modes of transportation should be implemented to the maximum extent possible.

Rhode Island's cities and towns may adopt one of four different forms of government: council–manager, mayor–council, town council–town meeting, or administrator–council. 23 CFR 450.310 TMA structures require that each metropolitan planning organization that serves a designated TMA shall consist of: Local elected officials; Officials of public agencies that administer or operate major modes of transportation in the metropolitan area, including representation by providers of public transportation; and appropriate State officials.



The transportation planning process is heavily represented by State government, but also should include representatives of local government and major modes of transportation to support decisionmaking. Because the CHAPTER 42-11 Department of Administration SECTION 42-11-10 specifies SPC membership (under any State law in effect on December 18, 1991) it is highly recommended that local elected officials such as city mayors, town supervisors, council members, or representatives of major modes such as the Providence Port, rail freight, passenger rail or others be included in the decisionmaking process to the maximum extent.

4.2 Metropolitan Transportation Plan

4.2.1 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

4.2.2 Observations

The MPO initiated development of a new 2040 MTP in 2017; however, the existing 2035 MTP was adopted in December 2012, requiring an update not later than December 2017. Consequently, the MPO adopted an interim 2017-2037 MTP using the 2035 plan as its basis while it continues work towards the 2040 plan. Due to the alignment of the MPA boundaries with the state boundaries, the RI MTP also serves as the State's long-range transportation plan. Additionally, the plan is one of 18 elements in the Rhode Island State Guide Plan.

The interim plan (Plan) includes limited details regarding specific anticipated projects in the out-years of the Plan, such as anticipated year of implementation of projects and cost estimates. Without identifying specific planned investments throughout the life of the Plan, it is difficult to determine financial constraint.

The Review Team's review of the interim MTP shows that there is room for improvement in the level of detail for the RIPTA financing, funding sources, and long-range transit planning. The 2017 Plan update did not fully present funding needs for transit system capital replacement and operations and maintenance for the duration of the planning time horizon. The on-going future needs of public transit providers need to be reflected within the Plan at a similar level of detail as what was provided for highway investments. There also appears to have been limited coordination on the Plan between RIDOT, RIPTA, and the Massachusetts Bay Transit Authority (MBTA) which operates the commuter rail in RI.

The MPO conducted an environmental justice analysis, and the results of the analysis are included in the interim Plan. Quantification of burdens was conducted on a macro level using an equation termed the "Location Quotient." The target population's proximity to an interstate and bus routes was used as a variable in a prior 2008 case study, along with access and air quality assumptions to calculate the measure of burden. An analysis was conducted as part of the recent MTP update, using the location quotient analysis with more recent data, using 2010 Census figures. This analysis found that a higher proportion of minorities and populations below the poverty level continues to bear a disproportionate burden with regards to the transportation systems studied with regards to exposure to emission, but proposed that benefits of the proposed transit program recommended in this Plan are expected to benefit minority and low-income households by increasing transit service available to them and by increasing their access to jobs and other opportunities.



The Plan (page 4-12) includes a sentence that is incorrect “The target populations for environmental justice are minorities, low-income individuals, and persons with disabilities.” The federal definition for environmental justice populations include minorities and low-income individuals. While persons with disabilities may be a part of one or both of those populations, they are also covered under the Americans with Disabilities Act (ADA). In addition, the Plan inaccurately uses the language ‘minority and low income populations’ and should be updated to discuss ‘minority populations’ and ‘low income’ populations. The documentation reflecting the grouping of minority and low income phrase could appear that low income white or minority populations above the poverty line are being excluded from analysis and consideration and based on discussion this is not the intent.

In addition to the location quotient analysis, the MPO conducted a ‘transportation equity benefit analysis (TEBA).’ The analysis includes minority populations and low-income populations. The TEBA also included school age children, aging individuals, individuals with a disability, limited English proficiency with regard to Spanish, Portuguese, and Chinese, French creole and Mon-Khmer, Cambodian and carless households to determine vulnerable populations. The analysis considered how the TEBA populations locations were being included in transportation program decisionmaking by looking at census tracts with STIP funding.

Outreach activities to the traditionally underserved populations such as minority populations and low income populations need to go beyond the efforts for the general population, to ensure that their needs are identified.

4.2.3 Findings

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.

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.

The MPO and RIPTA must work together during the update of the MTP to provide an accurate, and comprehensive, overview of transit needs in the region, and the level of funding (capital and operating) needed to meet those needs. Moreover, as the transit providers complete development of their transit asset management plans and priorities investments, the updated MTP should reflect those investment needs necessary to maintain the state of good repair of transit facilities and equipment.



4.3 Transit Planning

4.3.1 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 cited 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.

4.3.2 Observations

RIDOT & RIPTA are the primary providers of fixed-route service in the region. Rhode Island is also served by commuter rail managed by RIDOT, which contracts with the MBTA to provide the service. In the last three years, both agencies have been awarded federal funds for projects located in close proximity which would benefit from close coordination and collaboration, such as the Pawtucket/Central Falls train station, the Pawtucket Bus Hub, and the Providence Downtown Transit Connector, which is being managed by RIPTA on behalf of the City of Providence. Although there is an awareness of each other's activities, there is a demonstrated need for greater coordinated planning between agencies, as well as between third parties such as municipalities and Amtrak. The MPO is preparing to begin developing a transit master plan in the Spring, which will be a good venue for addressing the opportunities and challenges surrounding interagency coordination in the state.

As referenced in the MTP section of this report, the 2017 Plan update did not fully present the funding needs for transit system capital replacement, operations and maintenance for the duration of the planning time horizon. This fact in addition to the MPO's lack of awareness of projects and the status of RIPTA's TAM plan demonstrate the limited coordination between the MPO, RIDOT, RIPTA, and the Massachusetts Bay Transit Authority (MBTA).

The MPO staff has been educating itself and the Transportation Advisory Committee on the performance-based planning process through initiatives such as a MAP-21 Book Club, an internal educational series, and participation in FTA/FHWA-sponsored training opportunities. They have adopted draft performance measures for inclusion in the LRTP, but are still coordinating with RIPTA and RIDOT to finalize the adoption of their targets into the MPO's plan.

The SPC has 27 members and counts both RIDOT and RIPTA among them. In addition to its designation as the MPO, the SPC has jurisdiction over many planning functions statewide, and thus depends on its Transportation Advisory Council (TAC) to provide focused input on transportation. The TAC has 22 members, including RIPTA and RIDOT.



4.3.3 Findings

Recommendation: The MPO and its partners should consider developing a template or guide for an MOU to be used on projects involving multiple jurisdictions.

The SPC should consider creating a document which sets forth general principles for developing MOUs when RIDOT, RIPTA, and other parties enter into any project which requires, or would benefit from coordination. Due to the nature of SPC's jurisdiction, which covers land use, it may consider including municipalities in its development of MOU principles, as they are a frequent partner in transit projects. Such a guide could discuss when a MOU should be initiated or revised, as well as topics they may cover, such as responsibilities for decision-making, site-cleanup, land acquisition, and maintenance.

Recommendation: The MPO should develop its performance measures spreadsheet in greater specificity, giving transit its own section.

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.

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.

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.

4.4.2 Observations

TIP/STIP Development and Management

Up until 2016 SPC and RIDOT submitted their TIP/STIPs covering a period of four years every three to four years. In an attempt to create a more transparent process and provide cities and towns with more involvement, RIDOT leadership and the Governor's Office led the effort to change the TIP/STIP to cover a ten-year period which was passed under the RhodeWorks legislation. At the time, it was also decided from RIDOT leadership and the Governor's office to change the TIP/STIP to an annual update. Under an agreement between SPC and RIDOT, SPC leads the development of the TIP/STIP.

While SPC led the first full 10-year TIP/STIP redraft in 2017 they had expressed some reservation due to the effort needed to develop a TIP/STIP that includes projects representing a 10-year horizon and their concern over staffing and resource constraints. Additionally, many of the staff from RIDOT and SPC working on the update were new to TIP/STIP development with limited experience to the process. As a result, the development process produced many lessons learned. The methods being used to adjust to this new paradigm are still evolving.

There were also some highlights in the 2017 TIP/STIP redraft worth noting. SPC developed, in-house, an online TIP/STIP mapper with a database to quickly access formatted reports and information including locations and scoping for each project through MS Access and GIS. The TIP/STIP also includes tagging features to easily identify projects programmed where it relates to sea-level rise, performance measures, and their ADA transition plan. These are good practices and will assist them as they transition to Performance Based Planning and Programming.

Given the change in process and the level of resources being expended on the update the State and MPO are seeking other strategies to provide additional efficiencies to the STIP update and development process. For the TIP/STIP update this coming year RIDOT will be taking the lead and rather than a full redraft RIDOT plans on updating the TIP/STIP as a Major Amendment instead which should reduce the effort needed for the process. To further make improvements to the TIP/STIP development process and management both RIDOT and SPC requested federal assistance through a peer exchange which is still pending funding approval from FHWA. The objective of the exchange is to improve the overall STIP process, improve database/software, and determine the best ways to increase efficiencies and automate the STIP process. The peers



selected for the exchange include NYMTC (NYC MPO), MassDOT, Delaware Valley Regional Planning Commission, CTPS (Boston MPO), and NCDOT who were identified for the exchange for their use of technologies like eSTIP in the development and management of the TIP/STIP. There may be other peers who will join in who also have similar horizons to update their TIP/STIP. SPC also hopes to acquire new TIP/STIP software to find efficiencies in data input, automate data collection, reporting features, which currently is very time and work hour intensive. They also plan to include a mapping tool to make the TIP/STIP easier to read and merge their Transportation Asset Management Plan and STIP processes to increase efficiencies and strengthen the partnerships between the Division of Planning and RIDOT.

TIP/STIP Funding Representation

The Review Team's review of the TIP and ongoing involvement with RIPTA indicates that there is room for improvement in the specificity of the sources of funds and accuracy of the funding levels shown in the TIP particularly for transit projects. The TIP is required to clearly show the amount of each federal funding source and sources of non-federal funds for all projects constraint with Section 450.326(g)(3) of the Planning Regulation. Moreover, the TIP shall include a financial plan that demonstrates how the approved TIP can be implemented. The FTA/FHWA review of the TIP showed projects being funded with federal sources that are no longer available, incomplete descriptions of non-federal (local match) for transit projects, and limited support documentation for the financial plan indicating that the anticipated funding will be available. The TIP financial plan also does not describe the levels of funding required for system-wide operations and maintenance for transit, it primarily focusses on transit capital projects. These deficiencies have required TIP updates and at times, have limited FTA's ability to process capital grants to RIPTA in a timely manner.

Additionally, in reviewing the TIP the Review Team found inconsistencies in how phases were represented in the STIP. Some projects include phases in the description and others do not. Phases also did not represent an initiation date or associated year as referenced in 23 CFR 450.104.

4.4.3 Findings

Commendation: SPC developed, in-house, an online TIP/STIP mapper with a database to quickly access formatted reports and information including locations and scoping for each project through MS Access and GIS. The TIP/STIP also includes tagging features to easily identify projects programmed where it relates to sea-level rise, performance measures, and their ADA transition plan. These are good practices and will assist them as they transition to Performance Based Planning and Programming.



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.

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 modification procedures.

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.

4.5 Public Participation

4.5.1 Regulatory Basis

Sections 134(i)(5), 134(j)(1)(B) of Title 23 and Section 5303(i)(5) and 5303(j)(1)(B) of Title 49, require a Metropolitan Planning Organization (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(a) and (b), which require 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.

Specific requirements include giving adequate and timely notice of opportunities to participate in or comment on transportation issues and processes, employing visualization techniques to describe metropolitan transportation plans and TIPs, making public information readily available in electronically accessible formats and means such as the world wide web, holding public meetings at convenient and accessible locations and times, demonstrating explicit consideration and response to public input, and a periodically reviewing of the effectiveness of the participation plan.

4.5.2 Observations

SPC's transportation planning process includes sufficient public involvement measures to meet the regulatory requirements outlined in 23 CFR 450.316.



Although SPC's Public Participation Plan (PPP) was updated in March 2017, it does not accurately reflect SPC's public participation process. The PPP describes public meetings as SPC's sole method of providing the public with an opportunity to offer input. However, in addition to holding public meetings, SPC has employed a wide range of 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. SPC used contemporary public involvement methods especially during the development of its first bicycle master plan. The State of Rhode Island disallows SPC's use of social media platforms including Facebook, Twitter, and YouTube. For this reason, during the development of SPC's MTP, the MTP consultant hosted social media pages on its website to solicit public input. Public participation efforts for the MTP also included targeted outreach to disabled and aging populations.

Executive Order 13166, Improving Access for Persons with Limited English Proficiency, requires Federal agencies to ensure that recipients of Federal financial assistance provide meaningful access to their LEP applicants and beneficiaries. To comply with this EO, SCP developed promotional flyers and advertisements in Spanish, administered bicycle plan surveys in Spanish, and advertised on Spanish radio channels for public meetings. Language translation services are available at public meetings, but have never been requested.

There is not a coordinated effort regarding measurements of the effectiveness of public involvement. Although SPC completed an evaluation of the effectiveness of its public participation efforts in 2017 (included in Title VI report), this evaluation is limited to examining the results of surveys administered at public meetings, which include questions about the convenience of the time and location of the meetings. The survey results necessarily show selection bias. Further, survey respondents (and meeting attendees) are predominantly white, English-speaking, and above Rhode Island's median household income. These survey results do not constitute an accurate or comprehensive measure of the effectiveness of SPC's public involvement strategies and processes.

4.5.3 Findings

Commendation: The MPO is using contemporary, innovative public involvement strategies, including crowdsourced maps and pop-up outreach.

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.

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.



Recommendation: The Review Team recommends that SPC increase its efforts to measure the effectiveness of its public involvement strategies.

Recommendation: The MPO should ensure all outreach activities, including nontraditional strategies, consistently address accessibility needs including Section 508, ADA, and LEP provisions.

Recommendation: 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.

The MPO should develop direct involvement outreach procedures to reach these groups, monitor the success of various strategies and if they are not reaching targeted groups, conduct additional activities to fill the gaps identified. For example, some cultural groups rely on the spoken word, so appearance on local radio and cable shows may be a tool to improve engagement with different communities.

4.6 Civil Rights (Title VI, EJ, LEP, ADA)

4.6.1 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. 2000d 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 programs and activities funded with Federal dollars are prohibited from discrimination based on 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.

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.

4.6.2 Observations

Title VI Complaint Form

The MPO's Statewide Planning Title VI Complaint Form is inaccurate and includes language as a protected class. Language is not included in any of the nondiscrimination statutes. Also, the Form does not include other protected classes such as disability and age. The Form should be retitled as a "Complaint Form" and include the relevant nondiscrimination classes including, race, age, color, disability, national origin and sex. Also, any person or any specific class of persons, by themselves or by a representative, that believe they have been subjected to discrimination prohibited by Title VI of the Civil Rights Act of 1964 and related statutes, Section 504 of the Rehabilitation Act of 1973, or Title II of the Americans with Disabilities Act of 1990 may file a complaint.

STIP Appendix A, An Overview of Federal Nondiscrimination Executive Orders, Statutes and Authorities

The MPO is commended for its detailed assessment of the distribution of projects within the FY 2018-2028 STIP. However, there is no clear distinction between Environmental Justice (EJ) and Title VI. Persons covered under EJ are minority and low-income populations. Title VI protected classes include persons of any race, color and national origin. The data collection and analysis should be more consistent in its consideration of all groups under Title VI and other Civil Rights laws and should not be limited to the analysis of low income minority individuals. The analysis combines African American, American Indian & Alaska Native, Asian and Hispanic or Latino into one demographic category as minority individuals. The data collection and analysis should specifically include White, Black or African American, American Indian & Alaska Native, Asian and Hispanic or Latino.

ADA

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 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.

LEP

The Review Team was not able to locate the MPO’s LEP Plan or the Four Factor Analysis on the agency’s website. The MPO states that Public hearing notices and the Title VI Complaint form is published in Spanish. Google Translate is used for translation services, however this tool is not an effective communication method for the public. The MPO’s policy is unclear on language translation, and it is unknown how effectively the MPO communicates with LEP individuals.

4.6.3 Findings

Recommendation: 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.

The complaint form should be titled Title VI/Civil Rights complaint form. The new complaint form should be limited to race, age, color, disability, national origin and sex. Title VI protected groups should have race, color and national origin listed next to Title VI to assist complainants in identifying the category of the complaint.

Recommendation: 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 & 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.

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.

Recommendation: The MPO should develop a complete LEP plan.

The MPO will need to conduct a self-assessment to determine what types of contact the agency has with the LEP population. This will determine language service needs, and evaluates the bilingual, translation, and interpretation resources available to help LEP individuals access the MPO's programs. The MPO should conduct a comprehensive Four Factor Analysis to determine the extent of its LEP obligations, and use this analysis to develop a Language Access Plan. Once the LEP plan is finalized, it should be posted to the first page of the webpage with any translated versions posted in the same area to allow for easy access by those who have LEP. The LEP plan should also be incorporated into the MPO's public participation plan.

4.7 List of Obligated Projects

4.7.1 Regulatory Basis

23 U.S.C. 134(j)(7) and 23 CFR 450.334 requires that the State, the MPO, and public transportation operators cooperatively develop a listing of projects for which Federal funds under 23 U.S.C. or 49 U.S.C. Chapter 53 have been obligated in the previous year. The listing must include all federally funded projects authorized or revised to increase obligations in the preceding program year and, at a minimum, the following for each project:

- The amount of funds requested in the TIP
- Federal funding obligated during the preceding year
- Federal funding remaining and available for subsequent years
- Sufficient description to identify the project
- Identification of the agencies responsible for carrying out the project

4.7.2 Observations

The MPO does not have an annual listing for recent program years. The partner agencies have not documented their mutual responsibilities or the process for developing the annual listing.



4.7.3 Findings

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.

Schedule for Process Improvement: *A compliant annual list of obligated projects must be published within 90 days of the end of FY 2018.*

4.8 Freight Planning

4.8.1 Regulatory Basis

The MAP-21 established in 23 U.S.C. 167 a policy to improve the condition and performance of the national freight network and achieve goals related to economic competitiveness and efficiency; congestion; productivity; safety, security, and resilience of freight movement; infrastructure condition; use of advanced technology; performance, innovation, competition, and accountability, while reducing environmental impacts.

In addition, 23 U.S.C. 134 and 23 CFR 450.306 specifically identify the need to address freight movement as part of the metropolitan transportation planning process.

4.8.2 Observations

Rhode Island completed their State Freight Plan (SFP) in the fall of 2016 and was one of the first seven states in the country to have a FAST Act compliant and certified State Freight Plan. They were also one of the first states to designate their Critical Rural Freight Corridors (CRFC) and Critical Urban Freight Corridors (CUFC) increasing the mileage of roads in Rhode Island eligible for National Highway Freight Program (NHFP) funds by an additional 130.1 miles. The total investment represented in the SFP for the state's apportionment for FFY 2017 – 2020 is \$27.64 million dollars.

Given the unique structure and partnership of the transportation agencies in Rhode Island SPC led the effort in developing the State Freight Plan with the participation and support of the RIDOT. The collaboration in the development of the State Freight Plan was well coordinated between RIDOT and SPC. The Director of RIDOT championed freight in Rhode Island meeting with leadership in the rail and freight industry quarterly to explore freight needs and economic opportunities to support the growth of the state's commerce. At the request of this leadership forum the MPO wrote a white paper on freight in Rhode Island that led to the formation of a



Freight Advisory Committee (FAC) under the directive of the Director at RIDOT. The FAC guided the development of the Rhode Island State Freight Plan and held a number of public meetings to capture input from stakeholders across Rhode Island.

Since the completion of the State Freight Plan the Freight Advisory Committee has not met but intends to in April/May of 2018. The members on the FAC includes public and private sector leadership from 17 freight related stakeholder groups including RIDOT, SPC, RIDP, RIAC, Commerce RI, Quonset Development Cooperation, Rhode Island Resource Recovery Cooperation, RI EMA, FHWA, FMCSA, City of Providence, Rhode Island Trucking Association, Providence and Worcester Railroad Company, Moran Shipping, Waterson Terminal Services/Providence Port, University of Rhode Island, and Bryant University.

The Director of RIDOT who first initiated the State Freight Plan resigned in 2015 before the State Freight Plan was completed leaving ambiguity on the agency responsible for implementing the State Freight Plan. In order to use the allocation of NHFP funds states must update their State Freight Plan every five years. It will be important to identify the agency(ies) responsible for the development and implementation of the State Freight Plan in Rhode Island.

The current transportation legislation, FAST Act, is the first legislation to include the National Freight Program which provides funding across the country for freight mobility and programmatic improvements. These two funding opportunities includes 1) an allocation directly to states to administer statewide and 2) the Infrastructure for Rebuilding America Grant (INFRA)¹ which is a nationally competitive grant to fund projects of National or Regional significance. This new program significantly changes the State and MPO's role in integrating freight in to their planning process. Nationally, many MPOs are developing Freight Plans to compete for state allocated funding and to compete for INFRA Grants which, in total, will provide \$4.5 billion nationally over the FAST Act legislation FFY 2016 – FFY 2020. States and MPOs who proposes projects that include the following elements will complete well for funding:

- 1) Align and support National Freight initiatives through the Notice of Funding Opportunity,
- 2) Can demonstrate National and/or Regional Significance,
- 3) Collaborates with multi-jurisdictional coordination and has a variety of funding sources,
- 4) Is included in Regional and State Freight Plan and
- 5) Quantify benefits

¹ Formerly FASTLane Grant



When the FAC meets, there will be opportunities to discuss 1) how the State Freight Plan may be implemented, 2) current challenges in the state including truck tolling on bridges, truck stops, etc., 3) if members of the FAC plan on pursuing INFRA grant with the remaining \$1.95 billion available Nationally for FFY 2019 and FFY 2020, and 4) how Rhode Island can prepare to meet National Goals pertaining to freight performance measures. They may also consider discussing 5) how they can strengthen their position economically now that many of the surrounding states in New England and Tri-State area have also completed and are near completion of their State Freight Plans, and leveraging their collective membership with the I-95 Corridor Coalition.

Rhode Island played a key role in initiating the discussion on multistate coordination in hosting the recent *FHWA Freight and the Economy Northeast Megaregion Workshop* in August 2017 in the City of Providence at University of Rhode Island. It was well attended by all the New England states, New York, New Jersey, and Pennsylvania. The RIDOT Director, COO, and SPC's Planning Director providing opening remarks and leadership on a session in the management of transportation assets, identifying performance gaps, and investment strategies. Continuing the conversation amongst these states may provide additional realizations on how multistate collaboration can benefit the region economically and compete jointly for National grant opportunities, like INFRA or TIGER. Strong collaboration and buy-in from public and private stakeholders on freight improvements like the ones represented on the Rhode Island Freight Advisory Committee provides a competitive edge to compete for the national Federal grants.

SPC's recognizes that as the *National Highway Freight Program* is new to the country the need to build professional capacity amongst public transportation officials is crucial to the success of freight planning and implementing freight projects in the region as well. Recently SPC's proposed the activity, *Municipal Freight Scans*, in their Unified Planning Work Program. It is aimed at educating public sector freight staff and public officials on the freight industry, freight planning, and providing a comprehensive understanding of how public dollars can be invested to benefit the regional economy and the freight community. The Federal 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.

4.8.3 Findings

Commendation: RIDOT, SPC, and URI are commended for their part in hosting the *FHWA Freight and the Economy Northeast Megaregion Workshop* in August 2017 in the City of Providence which was well attended by all the New England states, New York, New Jersey. RIDOT Director, COO, and SPC's Planning Director providing opening remarks and leadership on a session in the management of transportation assets, identifying performance gaps, and investment strategies.



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.

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.

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.

4.9 Congestion Management Process

4.9.1 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.

4.9.2 Observations

The transportation planning process in the MPO needs to address congestion management through a process that provides for safe and effective integrated management and operation of the multimodal transportation system, based on a cooperatively developed and implemented metropolitan-wide strategy, of new and existing transportation facilities. In addition, travel demand reduction (including intercity bus operators, employer-based commuting programs such as a carpool program, vanpool program, transit benefit program, parking cash-out



program, shuttle program, or telework program), job access projects, and operational management strategies need to be analyzed and implemented as appropriate. The development of a congestion management process should result in multimodal system performance measures and strategies that can be reflected in the metropolitan transportation plan and the TIP. The level of system performance that is acceptable may vary in RI based on the type of transportation facility, location and daily or seasonal variations. In addition, consideration should be given to strategies that manage demand, reduce single occupant vehicle (SOV) travel, improve transportation system management and operations, and improve efficient service integration within and across modes, including highway, transit, passenger and freight rail operations, and non-motorized transport.

The existing congestion management process includes information that is out of date from December 2012. The congestion management process calls for periodic assessment of the effectiveness of implemented strategies in terms of the area's established performance measures.

The congestion management performance measures that were identified did not include any current information on the status of those measures. Although, information about the status is available to the public on the RIDOT Traveler Information page <http://www.dot.ri.gov/travel/> we could not locate any information of recent analysis of congestion. The RISTARS report was dated 2010 -2011 so has no current data.

There does not appear to be a coordinated program for data collection and system performance monitoring that could be used to determine the extent and duration of congestion. The congestion management process support transportation decisionmaking through current information provided by traffic volume counts (automated or manual) volume, expressed either as annual average daily traffic (AADT) or annual average weekday daily traffic (AAWDT), speed and travel time data: travel time and speed samples, archived ITS including operations data such as electronic toll collection systems, aerial photography-based congestion data, Transit data, bicycle/pedestrian data, crash data, or travel survey data.

The CMP does not provide most of the functions required in the regulations, for example

1. Develop CM Objectives
2. Identify Area of Application
3. Define System or Network of Interest
4. Develop Performance Measures
5. Institute System Performance Monitoring Plan
6. Identify and Evaluate Strategies
7. Implement Selected Strategies and Manage Transportation System
8. Monitor Strategy Effectiveness



4.9.3 Findings

Corrective Action: The MPO must develop an up to date congestion management process.

The scheduled CMP update must include all 8-steps in the CMP including defining performance measures. Performance measures are at the core of the CMP and are parameters to measure the level of congestion, identify locations, and indicate the extent of congestion in the region. Periodic assessment of the effectiveness of CMP strategies is critical and it is suggested that “periodic” be given target timeframes; and the CMP should become an important component that can supports transportation decisionmaking such as when scoring projects during the project prioritization process; and the congestion management process should be cooperatively developed.

Schedule for Process Improvement: *The CMP should be informing decision-making, including project selection, no later than the time the 2020 TIP is adopted.*

4.10 Performance Based Planning and Programming

4.10.1 Regulatory Basis

Per 23 U.S.C. 134(h)(2), the metropolitan transportation planning process shall provide for the establishment and use of a performance-based approach to transportation decision-making to support the national goals described in 23 U.S.C. 150(b) and in 49 U.S.C. 5301(c). In addition, each MPO shall establish performance targets to use in tracking progress towards attainment of critical outcomes for the region and shall integrate the goals, objectives, performance measures, and targets in their metropolitan transportation planning process and planning products. The establishment of targets shall occur in coordination with relevant State DOTs and providers of public transportation.

Performance based planning and programming (PBPP) refers to the application of performance management within the planning and programming processes of transportation agencies to achieve desired performance outcomes for the multimodal transportation system. This includes a range of activities and products undertaken by a transportation agency together with other agencies, stakeholders, and the public as part of a 3C (Comprehensive, Continuing, Cooperative) planning process. It includes the development of Metropolitan Transportation Plans and other plans and processes, such as Strategic Highway Safety Plans (SHSP), Transportation Agency Safety Plans, and programming documents, including the STIP and the TIP.



4.10.2 Observations

The MPO has initiated work related to PBPP and acknowledged the Federal requirements in the FFY 2018-2027 TIP and in the Long Range Transportation Plan/MTP. The MPO has been monitoring the performance-based planning rulemaking process and staff have participated in related webinars and workshops to stay apprised of developments along with coordinating with RIDOT. Additionally, at the initiation of performance rulemaking the MPO, RIDOT and FHWA Division Office conducted bi-weekly “Book Club” meetings to discuss section of MAP-21 related to Transportation Performance Management.

The final safety performance measure rule was effective April 14, 2016 and the system performance measure rules were effective May 20, 2017. The first applicable deadline for MPOs is to establish their own safety targets, adopt RIDOT safety targets or adopt a combination thereof by February 27, 2018. Prior to the deadline, the MPO voted to adopt the RIDOT safety targets. Any MTP or TIP updates on or after May 27, 2018 must be fully compliant with the safety performance measure requirements (May 20, 2019 for system performance measures and pavement/bridge measures).

Targets should be set by each transit provider or TAM plan sponsor for each applicable asset class for the coming year. Initial targets were required be set by January 1, 2017 and then every fiscal year thereafter. RIPTA has a subgroup working on TAM targets and they stated some targets have been set, however, at this time not all targets have been met.

The MTP needs to include:

- A description of the Federally required performance measures and targets used in assessing the performance of the transportation system. [23 CFR 450.324]
- A system performance report evaluating the condition and performance of the transportation system with respect to the performance targets [23 CFR 450.324]

The TIP needs to include (to the maximum extent practicable) a description of the anticipated effect of the TIP toward achieving the Federally required performance targets identified in the MTP, linking investment priorities to those performance targets. [23 CFR 450.326]

RIDOT is currently working on the initial Highway Transportation Asset Management Plan (TAMP) which is due April 30, 2018. RIDOT has collected Model Inventory of Roadway Elements (MIRE) for all roads within the state and is planning on going beyond the requirement of only reporting on NHS roadways in their initial TAMP. Additionally, RIDOT plans to include additional assets than the required pavements and bridges.

RIPTA is working on the Transit Asset Management (TAM) plan which is due October 1, 2018. RIPTA had received a SGR Asset Management Grant and Project for working on business



process that has since been discontinued due to issues with the contractor. RIPTA stated they would coordinate with the MPO during the development of their TAM plan.

Additionally, as the MPO acknowledged in response to the on-site review advance questions, they are still in the process of identifying performance measures and targets through the development of the MTP update. An online tool will be developed once the measures and targets have been determined to report out on the progress of tracking the measures and targets.

4.10.3 Findings

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.

Recommendation: FHWA/MPO/RIDOT should initiate recurring meetings to discuss the status and reporting requirements for PBPP and TAMP.

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 FY 2019 UPWP as identified in their response to the on-site review advance questions.

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.



U.S. Department
of Transportation

APPENDIX A – Review Initiation Letter



**United States
Department of Transportation**

Federal Transit Administration – Region 1
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Federal Highway Administration – RI Division
380 Westminster Mall, Rm 547
Providence, RI 02903

January 12, 2018

Michael DiBiase, Chairperson
State Planning Council
One Capitol Hill, 3rd Floor
Providence, RI 02908

Subject: Certification of Providence, RI Transportation Management Area (TMA)

Dear Mr. Chairperson:

The Federal Highway Administration (FHWA) and the Federal Transit Administration (FTA) will be conducting a Certification Review of the transportation planning process for your metropolitan area on **February 21 - 22, 2018**. The review will look at the cooperative planning process as conducted by the MPO, State, and public transportation operator.

Titles 23 and 49 of the United States Code (USC) require the Secretary of Transportation to designate urbanized areas over 200,000 in population as Transportation Management Areas (TMA). As a result of the 2010 Census, the Providence Urbanized Area continues to be a TMA. Designated TMAs are subject to special planning and programming requirements. In accordance with 23 USC 134(k)(5), the Secretary must certify compliance of the MPO in each TMA with the metropolitan planning regulations not less than once every four years. This is a joint responsibility of the FHWA and FTA. The four-year cycle runs from the date of the previously jointly signed Certification Letter, which was April 29, 2014.

The primary purpose of the Certification Review is to ensure that the planning requirements of 23 USC 134 and 49 USC 5303 are being satisfactorily implemented. As in past reviews, we intend to highlight good practices, exchange information, and identify opportunities for improvements. The review in February will include an on-site meeting and the opportunity for public participation. At the present time, we see our discussions primarily with the MPO, RIDOT and RIPTA staff; local member agencies may also be present to offer comments and their insights.



Some of the focal points we are proposing for the Certification Review meeting include the following:

- Long Range Transportation Plan
- Transportation Improvement Program
- Fiscal Constraint
- Freight
- Civil Rights
- Performance Measures

By **January 26, 2018**, we request that RI Statewide Planning provide us with a description of the status of recommendations from the previous 2014 certification and the attached list of documents.

If you have any questions, please feel free to contact Maria Chau of FHWA at 518-431-8878, Kurt Salmoiraghi of FHWA at 860-494-7561, or Leah Sirmin of FTA at 617-494-2459. The review is a positive means to advance our mutual goals to maximize the effectiveness of the planning process. We look forward to our on-site visit.

Sincerely,

Mary Beth Mello
Regional Administrator
Federal Transit Administration
Region 1

Carlos C. Machado
Division Administrator
Federal Highway Administration
Rhode Island Division

Attachment

cc: Mr. Parag Agrawal, Secretary, State Planning Council
Mr. Paul DiGiuseppe, Assistant Chief, Rhode Island Statewide Planning
Mr. Peter Alviti, Jr., Director, RIDOT
Ms. Meredith Brady, Administrator, Division of Planning, RIDOT
Ms. Amy Pettine, Acting CEO, RIPTA



Document Request

1. Documentation designating the urbanized area as a MPO.

All MPO agreements defining planning and programming responsibilities with other agencies

- Operators of public transit services
- State DOT
- Local Governments
- Staffing
- Others (Legal Services, etc.)

Status/documentation of agreements related to the expanded TMA/UA, State, other planning agencies, etc. as applicable.

MPO structure and voting membership of the Policy Committee, including bylaws for the MPO technical, policy, and any other committees. Please include latest version of the MPO's MOU and any related bylaws and procedures referenced in the MOU.

2. Metropolitan Planning Documents:

- Long Range Transportation Plan (LRTP) including public hearing report;
- Transportation Improvement Program (TIP) including public hearing report;
- LRTP and TIP project selection and/or development procedures, and scopes;
- Unified Planning Work Program (UPWP) and latest quarterly report;
- List of Obligated Projects

3. Latest Congestion Management Process (CMP) and scopes for development of update to the CMP.

4. Documentation of environmental mitigation and consultation discussions with Federal, State, Tribal, and local agencies.

5. Freight goods and services studies conducted by the MPO.

6. In the case of a major manmade or natural disaster, does the MPO have a Continuation of Operations Plan (COOP)? If so, please provide.

7. Please provide a list of all public and private agencies offering transit service in or through the Providence metro region.

8. Description of bike/ped committee membership, frequency of meetings and level of participation.

9. Public Involvement Participation Plan (including a portfolio for the Certification Review i.e. newsletters, meetings, etc.)



10. Other materials/documents that would be useful to the Review Team to address the review questions/items:

- Title VI procedures (including complaint procedures, complaint forms and notice to the public)
- Boundary Maps for the MPO (also provide in electronic format)
- Coordinated Public Transit Human Services Transportation Plan



APPENDIX B – Previous Findings and Disposition

The most recent certification review for the Providence urbanized area was conducted in 2014. The previous Certification Review findings and their disposition are summarized as follows:

Review Area	Recommendation	Disposition
MPO Organizational Structure	The MPO should maximize transparency by documenting the process by which MPO board committee members are selected, and by making this document available on their website.	This process is outlined in the State Planning Council Rules and Standards.
Agreements and Contracts	The MPO should update their MOU to provide more detail and to make it MAP-21 compliant in 2015. The MOU should reflect the new cooperative efforts that have been established through staff efforts.	The DOP, RIDOT, and RIPTA are seeking completion of the Tri-Party Agreement per Project 5.1 – Metropolitan Planning Process Tri-Party Agreement of the 2018 UPWP.
Agreements and Contracts	The MPO should develop a single, detailed MOU detailing the respective roles of RISPP, RIPTA, and RIDOT in the planning process. In particular, this MOU should include a description of the various partners' responsibilities in developing the UPWP.	The DOP, RIDOT, and RIPTA are seeking completion of the Tri-Party Agreement per Project 5.1 – Metropolitan Planning Process Tri-Party Agreement of the 2018 UPWP.
Unified Planning Work Program	Going forward, the MPO should continue to work with FHWA and FTA to ensure that the UPWP contains sufficient detail and information to allow those agencies to confidently make a determination of project eligibility for planning funding, and to demonstrate that each work item has a clear transportation nexus. In the case of interdisciplinary planning activities with both transportation and non-transportation elements, the UPWP should break down the tasks and expenses to the level of detail necessary to separate eligible activities from ineligible activities.	Starting in FY 15, DOP completely reformatted the UPWP in response to this concern and specific guidance provided by FHWA and FTA. The new format now provides an overview of Rhode Island's interconnected planning process and detailed descriptions that attempt to further highlight pertinent transportation nexuses. DOP continues to coordinate with FHWA and FTA on an ongoing basis to ensure that the UPWP contains sufficient detail to determine project eligibility.
Metropolitan Transportation Plan	The MPO should perform a full update of the metropolitan transportation plan during its next update cycle, to ensure that the plan reflects any changing demographics and transportation priorities in the region.	The DOP recently completed an Interim LRTP 2037. In addition, DOP is in the process of completing a full update to the LRTP 2040 pursuant to Project 10.1 – Long Range Transportation Plan of the 2018 UPWP.
Financial Planning	The MPO should work with RIDOT to improve planning level cost estimates, especially for large projects, concentrating on keeping them up to date in the MTP and TIP.	The DOP coordinated with RIDOT and RIPTA to complete the FFY 2018-2027 Transportation Improvement Program in December 2017 which includes detailed level cost estimates.
Air Quality Conformity	The MPO should continue preparing for possible revised non-attainment status by maintaining and improving air quality analysis and modeling efforts.	The TMA remains in attainment; however, the MPO continues to plan for the future such as tracking the federally required performance measures, having LRTP2040 address air quality, developing the Bicycle Master Plan which will positively impact air quality.



<p>TIP & Project Selection</p>	<p>The MPO should continue its development of an interactive GIS-based STIP tool and to incorporate these efforts to the greatest extent possible with efforts to develop an STIP system.</p>	<p>The DOP completed an interactive TIP web viewer for the FFY2017-2025 TIP. A revised STIP Map Viewer for FFY 2018-2027 STIP is currently being completed to include all projects. The viewer includes project information including TIP ID number, TIP Program, status, and funding details.</p>
<p>Public Outreach and Public Involvement</p>	<p>The MPO should review and revise the Public Participation Guide, where appropriate, to reflect the most current information and analysis. It should also reflect practices to facilitate compliance with 23 Code of Federal Regulations (CFR) 450.316 and the SPC's Standards and Rules.</p>	<p>The Public Participation Plan was updated on March 9, 2017.</p>
<p>Public Outreach and Public Involvement</p>	<p>As the MPO relies heavily on external resources for handling requests for auxiliary aids and services to allow the deaf/ hard-of-hearing, and visually impaired to participate in public forums, the MPO should interview Mr. James Pitassi, the RIDOA's Point of Contact for ADA Accommodations, to ensure that sufficient services can be made available within three (3) business days. The protocols for procuring those services should also be reviewed. We also recommend that the MPO's Title VI Coordinator speak with the appropriate person</p>	<p>Based on this review, the public notices for the State Planning Council, Technical Committee, Transportation Advisory Committee and RIGIS – Executive Committee have all been updated to uniform language. See Project 17.4 Translations Services from UPWP 2016. Thomas Mannock, Ph.D is now the contact for accommodations.</p>
<p>Title VI Civil Rights & Non-Discrimination - Notification to Beneficiaries and Complaint Procedures</p>	<p>Given the broad applicability of Title VI and the related statutes to transportation planning, the MPO should provide a direct link for "Civil Rights" from the MPO's home page (Statewide Planning). The Translation Services contact person information should be moved to the Statewide Planning page. The Policy should be revised to fully comply with 49 CFR 21.9(d), Appendix C to Part 21, and FTA Circular 4702.1B. Specifically, the MPO should give examples of the type of discrimination prohibited by Title VI, as it relates to planning. A statement about how to request additional information should also be provided. Having only a summary of the policy on the MPO's website is acceptable; however, in this case, a link to a more comprehensive policy (or notice to beneficiaries) would be appropriate. Where the protections under the Title VI (race, color, national origin (Including LEP)) are stated, the MPO should also recognize the related statutes that prohibit discrimination on the bases of sex, age, and disability. (These additional protections should be distinguished from those afforded under Title VI.)</p>	<p>These changes have been incorporated into the Division of Planning website.</p>



<p>Title VI Civil Rights & Non-Discrimination - Notification to Beneficiaries and Complaint Procedures</p>	<p>With regard to providing documents in languages other than English, the existing language should be revised for clarity. To ensure compliance with Section 508 of the Rehabilitation Act of 1973, the MPO should make its program documents available in plain text or HTML.</p>	<p>These changes have been incorporated into the Division of Planning website.</p>
<p>Title VI Civil Rights & Non-Discrimination - Notification to Beneficiaries and Complaint Procedures</p>	<p>The MPO should recognize within its complaint procedures that complaints in languages other than English may be submitted and reasonable accommodations will be provided for impaired individuals. We offer the following sample language: "Complaints may be accepted in languages other than English. Individuals with physically or sensory impairments requiring assistance in filing a complaint should contact"</p>	<p>These changes have been incorporated into the Division of Planning website.</p>
<p>Title VI Civil Rights & Non-Discrimination - Notification to Beneficiaries and Complaint Procedures</p>	<p>The MPO should remove "Religion" and "Familial status" from its form and process, unless covered by a State equivalent statute that prohibits discrimination in public programs. Reference to "retaliation" should also be removed. We also note that the internal version of the Title VI/Nondiscrimination complaint process should be revised to cover complaints on the basis of sex (gender) and age to be consistent with the relevant nondiscrimination statutes. Currently, the language in this procedure states, "A written statement of the complaint, including the following details: (b) Basis of complaint (i.e., race, color, national origin or language, disability, religion, familial status, or retaliation).</p>	<p>These changes have been incorporated.</p>
<p>Title VI Civil Rights & Non-Discrimination - Data Collection and Analysis</p>	<p>The MPO's data collection and analyses should be more consistent in its consideration of all groups protected under Title VI and the related statutes. We encourage the MPO to continue its monitoring of program equity, while using a metric that examines program benefits received by Title VI populations as compared to non-Title VI Populations.</p>	<p>The DOP incorporated this into an Equity Benefit Analysis in conjunction with the FFY 2017-2025 and FFY 2018-2027 STIP.</p>
<p>Title VI Civil Rights & Non-Discrimination - Data Collection and Analysis</p>	<p>Consistent with the recommendations above and to expand the protections afforded under the related nondiscrimination statutes, we note that data collection and analysis should not be limited to "minority and low-income." As indicated above, the related statutes prohibiting discrimination in federally assisted programs provide protections on the basis of disability, age, and sex (gender).</p>	<p>The DOP incorporated this into an Equity Benefit Analysis in conjunction with the FFY 2017-2025 and FFY 2018-2027 STIP.</p>



<p>Title VI Civil Rights & Non-Discrimination - Disadvantaged Business Enterprises (DBE)</p>	<p>The MPO should review its procedures relative to DBE participation on consultant contracts. Specifically, the MPO should coordinate with Vanessa Crum, RIDOT DBE Liaison Officer, to identify the pertinent Federal-aid civil rights provisions and to establish procedures for determining how and when contract goals will be established. The MPO should also report to RI DOT the total value of its United States Department of Transportation (USDOT)-assisted contracts, as well as the value of work assigned to and performed by DBEs as part of these contracts. RIDOT requires these figures in its semi-annual reports submitted to FHWA and FTA, where applicable.</p>	<p>A formal contracting document has been created to guide all staff members in complying with the Title VI and DBE requirements. See also Project Sheet 17.3 – Disadvantaged Business Enterprise Reporting from the UPWP 2016. Kelly Caesar and Richard Sparks are now the DBE Liaison Office contacts.</p>
<p>Freight</p>	<p>The MPO should formalize the current freight working group as a standing State Freight Advisory Committee, and expand its membership beyond the public sector to incorporate private sector, academia, and appropriate intermodal stakeholders.</p>	<p>The Freight and Goods Movement Plan was approved by FHWA on July 21, 2017. The Freight Advisory Committee has been formed and includes members from the private sector, academia, government and a variety of other stakeholders related to freight movement.</p>
<p>Freight</p>	<p>The MPO should update its Public Participation Plan to officially incorporate intermodal private sector freight perspectives.</p>	<p>The current Public Participation Plan identifies freight focus groups as well as identifies freight shippers and transportation services as being regularly involved in transportation planning including membership on the Transportation Advisory Committee.</p>
<p>Intermodal Transportation Coordination</p>	<p>RIPTA should work with MBTA to pursue fare integration, so that customers traveling to, from, and within Rhode Island can experience a more seamless multimodal transportation system.</p>	<p>RIPTA has awarded the fare upgrade and are currently working on implementation per Project Sheet 6.3 – Fare Payment Planning from the 2016 UPWP. The new fare collection system will integrate with MBTA which will be available in Summer 2019.</p>
<p>Environmental Justice and LEP</p>	<p>The analysis and plan should be revised to reflect the above observations. Specifically, the MPO should: 1) Provide more cost analysis and information to justify why key or vital document translations should only be in Spanish, whereas the populations of other LEP language groups exceed 1,000; 2) Identify the specific resources and how those resources will be procured, including any budget identified in the UPWP; and 3) Develop a timeline for completing the steps identified in its four-factor analysis and implementation plan.</p>	<p>See Project Sheet 17.2 - Title VI and Limited English Proficiency Plan Implementation and Project Sheet 17.4 – Translation Services of the 2016 UPWP. The DOP has funding available to translate documents into any language upon request as well as for interpreter requests. The DOP has an account with interpreter service with an MPA listed vendor. DOP developed an annual report summarizing translation and interpretation requests. In addition, the website uses Google Translate to translate our website to many languages.</p>



Visualization Techniques	<p>The MPO should continually review and implement improvements to its website to improve transparency and accessibility for members of the public. Transportation documents should be visually engaging, and grouped together in a prominent location. The MPO should look for opportunities to link to websites that may be of interest to its visitors, such as those of the transit operators and jurisdictions. In addition, the MPO should request that transportation providers and decision makers link to its website to increase awareness of the MPO and its role in regional transportation decisions. Finally, the MPO should consider new ways to communicate its committee structures, and processes and how the committee operates. This could include maps illustrating the representatives for various areas and a chart depicting the organizational structure.</p>	<p>DOP worked with the Office of Digital Excellence to update the website to make it compliant with ADA standards including for the visually impaired. For instance, the website is compatible with screen readers. The website links to transportation providers such as RIPTA and RIDOT, legislators as well as municipalities. The website also has links to the State Planning Council and its committees and describes their role, members, and links to the SPC Rules and Standards. The website also includes staff listings including phone numbers and email addresses.</p>
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U.S. Department
of Transportation

APPENDIX C - Agenda



U.S. Department
of Transportation

FHWA/FTA Transportation Planning Certification Review
Statewide Planning Council
Rhode Island Division of Planning
William E. Powers Building, Conference Room B, 2nd Floor
One Capitol Hill Providence, RI 02908

Agenda

February 21, 2018 (DAY I)

9:30-9:45 **Introductions & Opening Remarks** (15 min)

9:45-10:45 **MPO Overview** (60 min)

- Regional overview
- Organization & staffing
- Products/Services

10:45-11:00 *Break* (15 min)

11:00-12:00 **Civil Rights: Title VI, LEP, Environmental Justice** (60 min)

12:00-1:00 *Lunch Break* (60 min)

1:00-2:00 **Freight** (60 min)

2:00-2:15 *Break* (15 min)

2:15-3:45 **Metropolitan Transportation Plan (MTP)** (90 min)

3:45-4:00 **Final Thoughts and Day 1 Wrap up** (15 min)



U.S. Department
of Transportation



U.S. Department
of Transportation

FHWA/FTA Transportation Planning Certification Review
Statewide Planning Council
Rhode Island Division of Planning
William E. Powers Building, Conference Room B, 2nd Floor
One Capitol Hill Providence, RI 02908

Agenda

February 22, 2018 (DAY 2)

9:30-9:35 **Introductions** (5 min)

9:35-10:15 **TMA Coordination** (40 min)

10:15-12:00 **Performance Based Planning and Programming** (105 min)

12:00-1:00 *Lunch Break* (60 min)

1:00-2:30 **Transportation Improvement Plan (TIP)** (90 min)

2:30-2:45 *Break* (15 min)

2:45-4:15 **Financial Planning** (90 min)

4:15-4:30 **Final Thoughts & Closing Remarks** (15 min)

5:30-7:30 **TAC Meeting and FHWA/FTA Certification Public Input Session**
(William E. Powers Building, Conference Room A, 2nd Floor)



APPENDIX D – Public Meeting Notice

PUBLIC NOTICE

State Planning Council Quadrennial Federal Certification Review Opportunity to participate in Public Meeting and provide Public Comments

The Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) will convene one public meeting. This public meeting will be held to accept comments on Statewide Planning Council's (SPC) implementation of the Federal Transportation Planning Process in accordance with federal statute.

Opportunity for Public Comment on SPC's Implementation of the Federal Transportation Planning Process

The U.S. Department of Transportation 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 SPC is the designated MPO responsible for transportation planning in the State of Rhode Island.

The Federal Highway Administration and the Federal Transit Administration, in accordance with 23 USC 134(k)(5)(A)(i) and 49 USC 5303(k)(5)(A)(i)(e) must certify compliance with these regulations by MPOs not less than once every four years.

The primary purpose of the certification review is to ensure that the required planning activities of 23 USC 134 and 49 USC 5303 are being satisfactorily implemented by the SPC. This meeting will be your opportunity to talk directly with FHWA and FTA concerning your views on the transportation planning process in the SPC area.

The Statewide Planning Council (SPC)'s Transportation Advisory Committee announces that a public meeting will be held in conjunction with its quadrennial Federal Certification Review on:

Thursday, February 22nd, 2018 at 5:30 p.m.

Department of Administration

William E. Powers Building

Conference Room A, 2nd Floor

One Capitol Hill, Providence, RI

All persons may present their views on SPC's transportation planning process in person, through a representative, or by filing a written statement with FHWA or FTA. Written comments may also be sent by February 28, 2018 to:

Maria Chau or Kurt Salmoiraghi, FHWA

or

Leah Sirmin, FTA

FHWA RI Division

FTA Region 1

380 Westminster Mall, Rm 547

55 Broadway, Suite 920

Providence, RI 02903

Cambridge, MA 02142

Maria.Chau@dot.gov or Kurt.Salmoiraghi@dot.gov

Leah.Sirmin@dot.gov

The public hearing location is accessible to individuals with disabilities. Any individual requiring a reasonable accommodation in order to participate in this meeting should contact Thomas Mannock, Ph.D at 401-222-6377 (voice) or #711 (R.I. Relay) as soon as possible. Individuals requesting the service of an interpreter should contact Mr. Michael Moan at (401) 222-1236 at least 48 hours prior to the scheduled start of a hearing. Public transit schedule information for the workshops is available from RIPTA at (401) 781-9400 or www.ripta.com.



APPENDIX E – List of Participants

DAY 1- February 21, 2018

Name	Organization/Affiliation
Ben Jacobs	DOA
Drew Pflaumer	DOA
Josh O'Neill	DOA
Kevin Nelson	DOA
Lindsey Langenburg	DOA
Linsey Callaghan	DOA
Michael D'Alessandro	DOA
Michael DiBiase	DOA
Michael Moan	DOA
Nancy Hess	DOA
Parag Agrawal	DOA
Paul DiGiuseppe	DOA
Roberta Groch	DOA
Camille Bonham	FHWA
Carlos Machado	FHWA
Cassie Chase	FHWA
Jody McCullough	FHWA
Kurt Salmoiraghi	FHWA
Maria Chau	FHWA
Michael Chong	FHWA
Eric Papetti	FTA
Kristin Wood	FTA
Leah Sirmin	FTA
Peggy Griffin	FTA
Dwayne Weeks	FTA (by phone)
Rosemary Powers	Governor's Office
Dina Quezada	RIDOT
Meredith Brady	RIDOT
James Vincent	RIPTA



DAY 2- February 22, 2018

Name	Organization/Affiliation
Andrew Spiliotis	CMRPC
Ben Jacobs	DOA
Christine Delage-Baza	DOA
Drew Pflaumer	DOA
Josh O'Neill	DOA
Kevin Nelson	DOA
Lindsey Langenburg	DOA
Linsey Callaghan	DOA
Michael D'Alessandro	DOA
Michael Moan	DOA
Parag Agrawal	DOA
Paul DiGiuseppe	DOA
Roberta Groch	DOA
Camille Bonham	FHWA
Cassie Chase	FHWA
Jody McCullough	FHWA
Kurt Salmoiraghi	FHWA
Maria Chau	FHWA
Michael Chong	FHWA
Eric Papetti	FTA
Kristin Wood	FTA
Leah Sirmin	FTA
Dwayne Weeks	FTA (by phone)
Dina Quezada	RIDOT
Kevin Simpson	RIDOT
Meredith Brady	RIDOT
Greg Nordin	RIPTA
Lillian Picchione	RIPTA
Kate Rattan	SCCOG



APPENDIX F – Review Team

Camille Bonham, FHWA HQ	Peggy Griffin, FTA Region 1
Maria Chau, FHWA NY	Mark Kane, FTA HQ
Michael Chong, FHWA RI	Eric Papetti, FTA Region 1
Jody McCullough, FHWA HQ	Leah Sirmin, FTA Region 1
Kurt Salmoiraghi, FHWA RI	Dwayne Weeks, FTA HQ
	Kristin Wood, FTA Region 1



APPENDIX G – Public Comment Request

PUBLIC NOTICE

State Planning Council Quadrennial Federal Certification Review

Opportunity to provide Public Comments

The Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) are very interested in hearing from you on how the Federal Transportation Planning Process is being conducted in Rhode Island through the Statewide Planning Council (SPC) in accordance with federal statute.

Opportunity for Public Comment on SPC's Implementation of the Federal Transportation Planning Process

The U.S. Department of Transportation 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 SPC is the designated MPO responsible for transportation planning in the State of Rhode Island.

The Federal Highway Administration and the Federal Transit Administration, in accordance with 23 USC 134(k)(5)(A)(i) and 49 USC 5303(k)(5)(A)(i)(e) must certify compliance with these regulations by MPOs not less than once every four years.

The primary purpose of the certification review is to ensure that the required planning activities of 23 USC 134 and 49 USC 5303 are being satisfactorily implemented by the SPC.

On the back of this notice are questions to respond to on your perspective of how the MPO Transportation Planning Process is being implemented and opportunities to participate in this process. You may also provide an open written response and either mail or email it to FHWA/FTA.

Written comments may also be sent by March 5, 2018 to:

Maria Chau or Kurt Salmoiraghi, FHWA
FHWA RI Division
380 Westminster Mall, Rm 547
Providence, RI 02903

Maria.Chau@dot.gov or Kurt.Salmoiraghi@dot.gov

or

Leah Sirmin, FTA
FTA Region 1
55 Broadway, Suite 920
Cambridge, MA 02142

Leah.Sirmin@dot.gov

We thank you in advance and appreciate your comments. For

more information please call SPC at 401-222-1233.



FHWA/FTA Certification Review Public Comment Feedback Form

1. From your perspective, how well do you understand the Statewide Planning Council's (SPC) transportation planning process?

2. From your perspective how well is the SPC transportation planning process working to effectively improve transportation in the Region?

3. Are there opportunities for you to provide input on transportation issues and plans, such as the long range transportation plan and other studies?

4. Are there opportunities for people of all ages, abilities, incomes, races, to provide equal access and opportunity for input in the transportation planning process?

5. What are some things that work well?

6. What areas do you think can be improved?



APPENDIX H – Public Comment Received

RHODE ISLAND STATEWIDE PLANNING PROGRAM TRANSPORTATION ADVISORY COMMITTEE

Thursday, February 22, 2018
RIDOA, Conference Room A
One Capitol Hill, Providence, RI

DRAFT MINUTES

I. Attendance

1. Members Present

Mr. Michael Cassidy, Chair	Public Member
Ms. Susan Baker	City of Warwick
Ms. Meredith Brady	RI Department of Transportation (RIDOT)
Dr. Judith Drew	Governor’s Commission on Disabilities
Mr. John Flaherty	Grow Smart RI
Ms. Bari Freeman	Bike Newport
Mr. Ronald Gagnon	RI Department of Environmental Management
Ms. Martina Haggerty	City of Providence
Mr. Jonathan Harris	Sierra Club
Mr. Chris Maxwell	RI Trucking Association
Mr. James Moran	City of East Providence
Ms. Lillian Picchione	RI Public Transit Authority (RIPTA)
Mr. Daniel Porter	RI Airport Corporation
Ms. Jan Shedd	RI Department of Health
Mr. Michael Walker	RI Commerce Corporation
Mr. Cliff Wood	Providence Foundation
Mr. Michael Wood	Town of Burrillville/RI League of Cities and Towns

2. Members Absent

Mr. Everett Stuart, Vice Chair	RI Association of Railroad Passengers
Mr. Lloyd Albert	AAA Northeast
Mr. David Giardino	American Council of Engineering Companies (ACEC)
Mr. Timothy Scanlon	Construction Industries of Rhode Island
Ms. Dinalyn Spears	Narragansett Indian Tribe

3. Staff Present

Ms. Linsey Callaghan	RI Division of Statewide Planning Program
Mr. Michael D’Alessandro	RI Division of Statewide Planning Program
Mr. Paul DiGiuseppe	RI Division of Statewide Planning Program
Ms. Roberta Groch	RI Division of Statewide Planning Program
Mr. Benjamin Jacobs	RI Division of Statewide Planning Program



4. Guests Present

Rui Almeda	City of Woonsocket
Jim Riordan	RIAPA
Sherita Allen	RI Department of Transportation (RIDOT)
Grant Dulgarian	Ecology Action for RI
Kathleen Gannon	RI Bike
Peter Friedrichs	City of Central Falls
Leah Sirmin	FHWA
Maria Chau	FHWA
Camille Bonham	FHWA
Jody McCullough	FHWA
Christian Roseland	RI Bike
Barry Schiller	Public

1. Call to Order

At 5:30 p.m. Mr. Cassidy called the meeting to order.

2. January 25, 2018 Meeting Minutes – for action

Mr. Cassidy asked if there were any comments or modifications to the minutes from the January 25, 2018 meeting. Ms. Baker noted that she should have abstained on the previous vote, and asked that the minutes be altered to reflect this. [Ed: Staff noted that Ms. Pam Sherill was listed as attending in in the draft minutes. This was an error.] Staff agreed to make these changes. Ms. Brady made a motion to approve the minutes and Mr. Walker seconded. All present voted in favor. There were no abstentions or no votes.

3. Public Comment on Agenda Items – for informational purposes

Mr. Cassidy noted that many in attendance in the audience were likely present to make comments on the MPO recertification process, and that while such comments could be heard now, an opportunity later in the meeting would also be made to hear comments on this topic. Mr. Cassidy then asked if there were any comments on agenda items. There were none.

4. Associate Director Report – for informational purposes

Mr. Cassidy noted that Mr. Agrawal was not present. Mr. DiGiuseppe announced that the staff had been working with USDOT to complete the recertification process.

5. Certification Review of the Rhode Island Metropolitan Planning Organization by USDOT

- Public Hearing

Mr. Cassidy opened the public hearing at 5:33.



- USDOT Staff Presentation-for information

Ms. Sirman and Ms. Chau then presented the materials in Attachment 1.

Upon completion of the presentation, USDOT staff asked for input. Mr. Cassidy asked if staff had any comments first. Hearing none at that time, Mr. Cassidy asked for public comments.

Mr. Friedrichs, the director of planning and economic development for Central Falls, noted that the city has benefited greatly in working with the staff of the Division of Statewide Planning and RIDOT. This collaboration has resulted in millions of dollars of investments in vulnerable neighborhoods, which have taken the form of infrastructure projects and detailed plans. Mr. Friedrichs expressed the opinion that the Division of Statewide Planning provided invaluable technical assistance to local communities, and expressed his support for Rhode Works and RIDOT's ten-year plan. He noted that he is on the committee for the state Bicycle Mobility Plan, and appreciated all the work and investment being made into the Long-Range Transportation Plan (LRTP). On the other hand, Mr. Friedrichs did note that a 20-year planning horizon was too short, given that land use planning is typically done with a 75-100 year horizon, and that he would like to see more involvement from RIDOT in the LRTP.

Mr. Riordan, representing the Rhode Island chapter of the American Planning Association, and a member of the State Planning Council, expressed his support for the Division of Statewide Planning, and their ability to coordinate the transportation planning process across state agencies. The services provided are of great value to local municipalities in their work, and commended the collegial atmosphere fostered amongst government agencies and municipal planners.

Mr. Schiller, a member of the public and former TAC member, noted that in many ways the amount of participation in the Rhode Island transportation planning process is good, as the TAC has two opportunities for public comment in each meeting, the RIPTA board has opportunities for public comment, and RIDOT has roundtables with stakeholder groups. Mr. Schiller did express concern that municipalities submitting projects to the STIP are no longer required to hold a public meeting, which are important opportunities to vet potentially controversial projects. He also expressed concern at the kind of public workshops where members of the public could offer input to staff but not talk to and attempt to influence one another.

Mr. Almeda, Planning Director for Woonsocket, explained that the planning services provided by the Division of Statewide Planning have been invaluable to municipal planning departments that are perpetually short staffed and underfunded, particularly in the area of the creation and implementation of local master plans. Woonsocket is particularly appreciative of the investments and planning assistance made in the city's Main Street. Mr. Almeda suggested that the state make efforts to bring zoning ordinances in line with



citizen expectations by encouraging form based codes. He also suggested that the Division make efforts to educate elected officials around the importance of planning.

Mr. Roseland, president of the Rhode Island Bicycle Coalition, noted that his organization represents vulnerable road users but had not been consulted for the 2016 Freight and Goods Movement Plan.

Mr. Cassidy asked if any TAC members had any comments.

Ms. Freeman expressed concern that the timeframe for submissions to the STIP by municipalities was too limited for scheduling local public hearings, even if they wanted too. There was also not enough done to educate those submitting projects as to the proper way to prepare an application. This issue was discussed in the August or September TAC minutes. Mr. Flaherty noted that GrowSmart RI is working with the Division of Statewide Planning to conduct a workshop on March 29 to help educate municipal officials on this issue.

Mr. Cassidy agreed that it was important to have public input, and suggested that possibly there be a requirement for a public hearing for new projects, but that there not be a requirement for hearings on projects that were already on the STIP. Mr. Cassidy also commented on the diversity of the TAC, which is very representative of the public given the small size of the state. He emphasized the importance of the fact that the TAC works well together.

Mr. Flaherty commented that there seemed to be a lack of a public process surrounding the submission of TIGER grants.

Mr. Mike Woods noted that city and town councils are aware of the importance of public input in the creation of a project, that they are fully capable of deciding when they need to hold a public hearing, and that they should not be subject to top-down requirements as to when they need to hold such hearings.

Mr. Cassidy asked if there were any other comments. Hearing none, he closed the public hearing at 6:08 PM

Ms. Chau noted that public comment can be made via written forms, emails, or phone calls. Mr. Cassidy asked staff to make sure the forms available on the planning website and that they be emailed to the members of the TAC.

6. Adopt MPO Transportation Safety Performance Targets for FY 2018- *for action*

Mr. Cassidy asked Ms. Callaghan to begin her presentation on the MPO safety targets. Ms. Callaghan noted that, due to time constraints imposed by FHWA, these targets had already been approved by the State Planning Council (SPC), and that the TAC was being asked to vote to reaffirm with that decision. She then presented the materials in Attachment 2.



Several members of the TAC were confused by the fifth measure, “Number of Non-Motorized Fatalities and Non-Motorized Serious Injuries.” Concern was expressed that it was difficult to understand how this compound figure compared or related to the other measures being presented. Ms. Callaghan noted the measures themselves were chosen by FHWA, and that she did not have the underlying data on hand, but that staff could present more detail on these figures at the next TAC meeting.

Several members of the TAC were also struck by the spike in fatalities in 2017, and requested information on the source of this trend. Ms. Callaghan agreed that, while she did not have the underlying data on hand, that more information should be presented at next month’s TAC meeting, but noted that due to the state’s small size it was very easy to throw off the numbers in a given year. This is why the targets are based on a five-year average.

Several members of the TAC expressed concern at using a 4% reduction target for all measures across the board. Many were unsure how this figure had been arrived at, and wondered how this process compared to neighboring states, while others felt that it was not aggressive enough given the fatality spike in 2017. Mr. Mike Wood suggested that there was no need for the states to be held accountable to targets, while other members of the TAC suggested that, given the state’s strong focus on vulnerable road users, the targets presented did not seem to reflect state policy. Ms. Callaghan agreed to have staff from RIDOT present more information about the targets and the data at the next TAC meeting.

Mr. Walker made a motion to vote and Mr. Mike Wood seconded.

Several members of the TAC noted that they were uncomfortable voting on these measures without more information, while several others suggested that the TAC was getting hung up on a chart when the topic of discussion was a set of targets that had already been voted on by the SPC.

As a motion and a second had already been made, the chair moved to a vote on the adoption of the transportation safety targets. There were twelve votes in favor. Ms. Freeman and Ms. Haggerty voted against. Mr. Cliff Wood and Ms. Picchione abstained. The motion passed.

7. Transportation Improvement Program Process and Checklist - *for discussion*

Mr. Cassidy asked Ms. Callaghan to lead the discussion on the TIP process and checklist.

In light of long discussions between RIDOT and the Division of Statewide Planning about the STIP amendment process, staff prepared a checklist and an Excel form to streamline the STIP amendment process. The presented materials are in draft form, and the Division of Statewide Planning will be accepting comments from RIDOT and the TAC. Examples of these forms are presented in Attachment

3.



8. Discussion of Long-Range Transportation Plan Performance Measures- *for discussion*

Mr. Cassidy asked Mr. D'Alessandro to begin the presentation, and Mr. Dalessandro presented the materials in Attachment 4.

There was some discussion about potential equity metrics. Those with suggestions in this and all other metric areas were encouraged to email the Division of Statewide Planning.

9. Public Comment on Non-Agenda Items - *for discussion*

Mr. Friedrichs commented on page 4 of the notes from the TAC meeting on January 25, 2018, noting that investments in bike funding should not come out of other areas, but should be wrapped into other projects. As other projects are built, bike infrastructure should be incorporated into the process.

Mr. Schiller made several suggestions that could help target traffic safety in the short term relating to combating DUIs, including requiring ignition interlocks. He also suggested that using money from the green economy bond to build bicycle infrastructure would increase safety, not only by means of the direct infrastructure, but also by building a critical mass of bicyclists which would help change driver behavior. Mr. Schiller also highlighted the need for education about the new cell phone driving ban, to reduce distracted driving. He concluded that according to the RIDOT Safety Plan, a person is much less likely to die in a bus than in a car, and so encouraging transit usage has a safety component.

Mr. Roseland noted that there are between 0 and 2 pedestrian and cyclist deaths in a given year, but that this is not a particularly meaningful statistic given the smaller number of trips per capita. He agreed with those on the TAC who felt that the current goals were not aggressive enough, and noted that bike and pedestrian fatalities and injuries were not due to the inherent danger of bicycling or walking, but because of the danger presented by automobiles to other road users.

10. Announcements – *for discussion*

Mr. Flaherty noted that the previously mentioned workshop on March 29 will be part of a larger conference, The Power of Place Summit, which brings together 400-500 people to discuss topics of planning interest. There will be a number of transportation related topics.

Mr. Cassidy reminded the TAC of the Statewide Planning Speaker series, with an upcoming speaker on ride sharing on February 28, and another speaker on the subject of transportation funding occurring on March 22.



Ms. Haggerty announced that the City of Providence will be holding four open houses on the soon to be implemented bike share program.

11. Adjourn

Mr. Walker made the motion to adjourn which was seconded by Mr. Cliff Wood. All present voted in favor. There were no abstentions or no votes. The meeting adjourned at 7:04 PM

Prepared by: Benjamin Jacobs, Research Technician

Respectfully Submitted,

Paul DiGiuseppe



FHWA/FTA 2018 Certification Review- Providence, RI

Request for public and stakeholder input

1. From your perspective, how well do you understand the Statewide Planning Program's (SPP) transportation planning process?

still learning

2. From your perspective, how well is the SPP transportation planning process working to effectively improve transportation in the Region?

very well - collaborative / professional / inclusive of ideas / concerns of communities & other constituents

3. Are there opportunities for you to provide input on transportation issues and plans, such as the long range transportation plan and other studies?

yes

4. Is there equal access and opportunity for people of all ages, abilities, incomes, races, to provide input in the transportation planning process?

yes

5. What are some things that work well?

meeting times / sometimes good communication / good use of sub committees & community mtgs

6. What areas do you think can be improved?

not sure



APPENDIX I – List of Acronyms

ADA: Americans with Disabilities Act
CAA: Clean Air Act
CFR: Code of Federal Regulations
CMP: Congestion Management Process
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 21st Century
MPA: Metropolitan Planning Area
MPO: Metropolitan Planning Organization
MTP: Metropolitan Transportation Plan
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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