



November 13, 2020

Governor Gina Raimondo
Rhode Island State House
Providence, RI 02903

Re: Restructuring of Kennedy Plaza

Dear Governor Raimondo,

As President of the Rhode Island Chapter of the American Planning Association (APA-RI), I would like to offer an introduction to our organization. Our 150+ members join 40,000 members nationally in serving our respective communities and the State with sound planning in the public interest. We aspire to a common goal of creating equitable, open, vibrant, prosperous communities of lasting value.

APA-RI members are community planners and allied professionals, elected and appointed local planning officials, educators, students, and engaged citizens. Meaningful and effective planning creates stronger and more just communities through access to opportunities, strategic investments in innovation, and broadly shared prosperity. It also saves time and money by creating a broad consensus around objectives. Our diverse membership serves the state and the 39 cities and towns in Rhode Island and represents a broad range of issues around land use, economic development, housing, the environment, and transportation.

Kennedy Plaza

No one wants improvements to the State's transit system more than Rhode Island's planners. We have been troubled to watch basic community planning missteps result in wasted time, wasted money, and a poorly received project.

We remain optimistic that the \$35 million Transit Hub bond that passed six years ago will be used for its intended purposes, including to provide a more efficient, effective, equitable, safe, and attractive transit hub in downtown Providence that can also serve as a vibrant public space for Rhode Islanders and visitors. These purposes are not mutually exclusive, and we believe that a planning process that truly involves the public and listens to the needs of RIPTA riders, downtown residents, and businesses can inspire a solution that works for everyone.

Unfortunately, the current multi-hub plan does not meet this purpose. First and foremost, it is contrary to the basic principles of transportation planning. People make transportation decisions based on convenience, cost, travel time, and safety. Placing a station far from the desired destination and increasing transfers are major disincentives to transit ridership. The

proposed dispersal ignores the expressed purpose of the bond and the clearly articulated needs of the community. **The bond money was intended to improve transit** by addressing problems identified in robust public outreach efforts like the City of Providence's 2017 Vision and the State's Transit Master Plan. RIPTA's primary strategic advantage over cars – a central transfer location where people want to go – will be seriously compromised, and ridership is likely to decline. While adding electric buses to RIPTA's fleet is a positive move, the real game changer for reducing carbon emissions is getting more people to choose transit over private vehicles. Fewer people will make that choice if their bus station is no longer safe or convenient. The environmentally sustainable choice is the choice that encourages more people to take transit.

What went wrong? Any APA-RI member will advise you that when starting a big, transformative project using taxpayer money, the first step is solid public outreach. Go wide: get everyone thinking about the problems and possible solutions. Then bring it back to the experts to produce projects that address those problems. The whole process takes about five months, generates public trust, and creates a nice set of 10% engineering drawings the State can use to get an architectural/engineering firm on board. Estimated time before ground-breaking depends on the complexity of the project.

Unfortunately, RIDOT's pattern to date has been to engage design experts first, and then, plan in hand, shop it around to the public. It should come as no surprise that this plan has not been well received by the public. It doesn't reflect their needs. **APA-RI strongly encourages the Administration to take a step back and listen to the public before attempting another proposal.** Many of our 150 members are happy to help facilitate these conversations.

Finally, we have an uncomfortable point to make. This proposal can and should be argued on its technical merits, which are poor. But we must ask, why this proposal for this location? This proposal is harmful to people of color and people of lesser means. **Systemic racism is what happens when we don't examine patterns**, so let's look at the facts:

- RIDOT did no preliminary public outreach with riders before beginning to draft plans.
- Riders impacted by the plan are majority-minority and predominantly low-income.
- The majority of RIPTA's riders are traveling to work or school.
- To the best of our knowledge, the Administration has not been conducting federally required Title VI discrimination review.
- RIDOT says they are getting feedback from RI Transit Riders and the RIPTA Board, but:
 - o The RIPTA Board no longer has a single RIPTA rider
 - o RI Transit Riders did not like the plan and were not involved in its scoping.
 - o Because there was no public feedback opportunity, riders turned to the open RIPTA board meeting. Forty riders called in to object.
- The Providence City Council voted UNANIMOUSLY in opposition after wide opposition.

The fact that not a single bus rider was involved with scoping this project violates a professional planner's ethical code <https://www.planning.org/ethics/ethicscode/>. We are all trained to

develop big, visionary plans with the input of the whole community, not just powerful economic interests.

This approach opens up RIDOT, its contractors, and other involved agencies to violations of Title VI of the 1964 Civil Rights Act and Executive Order 12898, the Executive Order on Environmental Justice. Locally funded projects are not exempt from federal rules. The nondiscrimination requirements of Title VI extend to all programs and activities of state transportation departments and their respective sub-recipients and contractors, as clarified by the Civil Rights Restoration Act of 1987.

It is not too late to change course. We believe that RIDOT, RIPTA, the Mayor, and our governor share the goal of ensuring downtown Providence is vibrant, safe, fun, and welcoming. A bus hub, vibrant public gathering space, and thriving business district can coexist. They are not mutually exclusive goals, and one does not have to be removed to make way for the others. We can learn from fabulous examples of such spaces across the country and around the world.

The scoping stage in a proposed transportation project provides early identification of issues arising that could potentially violate Title VI and EJ. The planning work to date has missed this, but better to pause now than to be stopped later by a court order.

We urge you: At a minimum, go back to the robust public process you already have in existing plans to set the priorities for the bond funding. Even better, take a few months to listen to the needs of riders and the local community, reaching people where they are. APA-RI is more than willing and ready to help with that. Only then should the engineers get to work.

Thank you,

Jeff C. Davis, AICP
President
APA - RI