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June 26, 2024

Rhode Island Department of Transportation  
c/o Peter Alviti, Director  
2 Capitol Hill  
Providence, RI 02903

RE: **PRUDENCE ISLAND LIFELINE FERRY PARKING**

Dear Mr. Alviti,

I am writing to you today to gather support for the Bristol Parking Workgroup, established by the Prudence Island Planning Commission, to identify potential solutions to the untenable situation created by the Town of Bristol when it stripped away ferry passenger parking that had been located on the Prudence Island Ferry Dock (for more than 100 years) to build out its municipal marina. Beyond the obvious parking challenges to infrequent visitors to Prudence Island, given the complete lack of nearby day and overnight parking availability, this poses a significant challenge to frequent commuters that travel daily or multiple times per week to work, school, sports programs, etc. It is for these individuals that the ferry can truly be classified as a **lifeline** service. As the only secure overnight parking available to these frequent commuters is located half a mile away on a private commercial lot, this adds an additional 30 minutes to the daily commute and is simply not possible for individuals that are in any way mobility challenged. Given the walking distance and the possibility of losing that single, paid, off-street option when the property is eventually sold, I have no doubt this will impact the demographics of this small community over time as well. I would urge the RIDOT to use funds identified in the State of RI Transportation Improvement Program (FFY 2018-2027) for Stops, Stations & Terminals (or any other available funding source) to help the frequent commuters to and from Prudence Island to identify and secure parking options before the younger generation that wishes to raise their families on the island deems it too difficult to do so. Plans are already in place to provide a shelter on the Prudence Island Ferry Dock for ferry passengers but that seems an inappropriate upgrade priority and use of these funds if passengers have already had to walk an unsheltered half mile or more to get to that shelter from wherever they were able to find parking. We need the state's help to find and secure nearby parking to accommodate frequent commuters and maintain this **lifeline** ferry service.

First, a brief recap of recent history as to how these parking issues came about. [There is additional historical context, available upon request, that is relevant but not included here for the period up to and including the Town's acquisition of the Prudence Ferry Dock in 2014.] The Town of Bristol applied for and secured a 2017 Passenger Ferry Grant with the intended purpose of rehabilitating the north

and south walls of the Prudence Ferry Dock to 'preserve the Town dock for many years in order to support the **lifeline** service to Prudence Island'. Upgrades included the resurfacing of the ferry parking lot (which frequent commuters had exclusively relied on to meet their parking needs at the Bristol ferry terminal). It is worth noting that a previous project had already improved the terminal end of the dock to ensure continued ferry service at that location was possible and, if the parking lot improvements were not intended for use by ferry passengers (as opposed to those who make the trip more infrequently in a vehicle), there was nothing in that funded project that actually supported the walk-on passengers of the ferry. Instead, those federal funds were used in their entirety to support the planned municipal marina expansion. The federal Department of Transportation was alerted (in a letter dated April 1, 2023) to this misappropriation and misuse of federal funds but responded that, upon review, they did not identify a misuse of funds as no minimum parking requirements are required for facilities constructed using Federal Transit Administration funds (which is interesting as I doubt very much RIDOT could build a commuter train terminal without dedicated parking for the purpose identified). Further, they indicated that decisions regarding parking facilities should be determined by state and local jurisdictions responsible for the maintenance and operation of the facility. When the work funded by the Passenger Ferry Grant commenced, frequent commuters were evicted from the Prudence Island Ferry Dock and were accommodated in a parking area leased by the Town of Bristol (displacing existing day-use and paid seasonal use parking spaces), until the long-anticipated development of the adjacent property was approved, and those parking spaces were no longer available.

The Public Utilities Commission (PUC) was also alerted (in a letter dated January 28, 2023) to this critical parking issue and the significant impact it would have on the continuation of this **lifeline** ferry service. As the PUC has the jurisdiction and duty 'to investigate the sufficiency and reasonableness of facilities and accommodations' of specific modes of transportation such as ferries (see sidebar for complete mandate), it was hoped that they would help to identify the minimum and varied parking needs of the Prudence Ferry that would support this **lifeline** ferry service. Despite the PUC's clear mandate, the PUC responded that the Commission's authority is limited 'solely to setting rates' that are charged by the ferry service. Also, that the issues raised appear to be 'local in nature' and they recommend that we address them with the applicable municipal authorities and representatives in our community.

The RI Coastal Resources Management Council (CRMC) received an assent application for the Bristol marina expansion project in 2019

## PUC Mandate

The Public Utilities Commission serves as a quasi-judicial tribunal with jurisdiction, powers, and duties to implement and enforce the standards of conduct under §39-1-27.6 and to hold investigations and hearings involving the rates, tariffs, tolls, and charges, and the sufficiency and reasonableness of facilities and accommodations of railroad, ferry boats, gas, electric distribution, water, telephone, telegraph, and pipeline public utilities, the location of railroad depots and stations, and the control of grade crossings, the revocation, suspension or alteration of certificates issued pursuant to §39-19-4, appeals under §39-1-30, petitions under §39-1-31, and proceedings under §39-1-32.

before the work funded through the previously noted Passenger Ferry Grant was fully completed. A CRMC engineering review dated October 2, 2020, noted that the Town first attempted to have Bristol Harbor designated a destination harbor, but that request was not granted. It was the opinion of CRMC staff that the notoriously difficult parking in Bristol during the summer would not be helped by the marina expansion, but the variance request submitted appeared to be the minimum necessary as there are sufficient parking spaces for the non-transient vessels. Having reviewed the variance request myself, in which 74 parking spaces were allocated to the marina instead of the required 85, a request was made to the CRMC (in a letter dated April 1, 2023) that they revoke their Assent (A2019-11-078) on the grounds that the Town of Bristol had not been honest about the availability of parking spaces for the expanded marina in their variance request. That letter did not apparently warrant either a Council discussion or a response. Of the 74 parking spaces promised for marina patron use in the variance request, 50 are located on the Prudence Ferry Dock (from which the ferry patrons had recently been evicted). Note that the Bristol Harbormaster has since designated a few of these spaces for use by individuals who are commuting to the island (specifically, Portsmouth DPW staff, individuals covering shifts at the Prudence Island Volunteer Fire Department, Narragansett Bay National Estuarine Research Reserve staff, as well as a few of his personal friends). The additional 24 spaces of the 74 identified in the variance request for marina use are in what was previously a seasonal daytime use municipal lot located across the street from the Prudence Ferry Dock. That lot was leased by the Town of Bristol from the owners of Robin Rug and, like the leased municipal lot located further south on Thames St (also owned by Robin Rug) which was used primarily for ferry passenger use, the lease was terminated when the property development was approved. The lot in question, containing 24 of the 74 spaces, is not currently unavailable and has not been available for years. Apparently, the Town of Bristol does have some commitment from the developer to transfer this parking lot (located across the street from the ferry) to the Town once the permitting process for the development has been completed. However, the Town of Bristol has consistently communicated to the Chairman of the PIPC that this parking would be made available, not for marina patron use as promised in the variance for the assent, but free of charge to anyone for daytime use and for a \$10 fee for overnight use on a first-come, first-served basis. Although that was not what was promised in the CRMC variance request it may, to some extent, make parking easier for infrequent, short-term visitors to Prudence Island. However, it would in no way accommodate the needs of full-time residents of Prudence Island that rely on this **lifeline** ferry service to travel *from* the island and back daily.

A & R Marine, which operates the Prudence Island Ferry, intends to begin operating a larger ferry through the summer months. The PUC gave their approval of a larger ferry (which will increase the number of vehicles on the island by 25-30% from spring through fall and 100% in the winter) without any requirement for either an impact study or a ferry patron survey. Personally, I believe the impact of the change to a larger capacity ferry could be significant on both sides of the Bay. Although it will no doubt be easier to secure a vehicle reservation (not a passenger reservation as that number is capped at 150), there will be far more vehicles on the island which will create parking issues at all venues, cause more wear and tear on the roads, and consistently increase the population (which in turn increases water use, trash collection/removal requirements, and puts an unsustainable burden on the limited number of volunteer emergency responders) in all seasons. In addition, a larger ferry will create a bottleneck during ferry times that blocks marina patron parking on the Prudence Ferry

Dock in Bristol which will prevent ferry passenger access for people and supply drop off at the planned shelter at that location and result in frequent blockage of one lane of Thames St. At the Prudence Ferry landing it will simply become impossible to enter and exit the available parking spaces (this will be particularly true during the short fifteen minutes between scheduled ferry arrivals and departures) because all parking spaces will be completely blocked by vehicles lined up to get on the ferry. Note that the individuals most impacted (on both sides of the Bay) by the change to a larger ferry will, once again, be those who rely on this **lifeline** ferry service.

To date, the response at the municipal and state level to the Prudence Island communities' concerns about the lack of available parking in Bristol for this **lifeline** ferry service has left much to be desired. If it is not the PUC's responsibility, then we need your help to identify whose responsibility it is (and the PUC's mandate should be rewritten). Both The Town of Portsmouth and the Town of Bristol have indicated that they do not believe it is their problem. The CRMC apparently has a minimum requirement for marina parking but no such minimum for a passenger ferry, as evidenced by the fact that they were made aware that ferry patrons were displaced to accommodate marina patrons. The CRMC was also seemingly unconcerned about the inaccuracy of information about the actual availability of parking spaces identified in the variance required for the marina expansion. There simply seems to be no governmental oversight and the agencies that have been contacted which should, and have the actual responsibility to, care about restrictions to this **lifeline** ferry service, and the impact on individuals that are dependent on it, seem uninterested in helping the Prudence Island community identify a solution. I am very hopeful that, with your assistance, we can identify options to ensure that this **lifeline** ferry service continues to serve that role for island residents that depend on it to continue making Prudence Island their home.

Respectfully,



Robin LJ Weber

Prudence Island resident and business owner

CC: Senator Linda Ujifusa  
Representative Susan Donovan  
Ronald Gerwatowski, Chairman, PUC  
Jeffrey Willis, Executive Director, CRMC  
Steven Contente, Town Administrator (Bristol)  
Rich Rainer, Town Administrator (Portsmouth)