



April 9, 2026

Honorable Jacob E. Bissaillon
Chair, Senate Housing and Municipal Government Committee
State House
Providence, RI 02903

RE: S2124

Dear Chair Bissaillon:

I write on behalf of the American Council of Engineering Companies of Rhode Island (ACEC-RI), to thank you and your colleagues for your leadership and continued attention to and investments in the safety and integrity of Rhode Island's transportation infrastructure. As the Committee considers S2124, regarding operations within the State Department of Transportation ("RIDOT"), I write to provide essential professional context regarding the role Rhode Island's engineering firms play in safeguarding public infrastructure and suggestions for collaborative efforts to improve how ACEC-RI's member firms work with RIDOT in the future.

ACEC-RI MEMBERS' CONTRIBUTIONS TO RHODE ISLAND

ACEC-RI represents engineering companies across Rhode Island, providing design, inspection, planning, program management, and advisory services. Our members include locally-owned, national, and global firms with long-standing commitments to Rhode Island, collectively employing thousands of Rhode Islanders. Our members generate hundreds of millions of dollars of economic activity annually, supporting subcontractors, suppliers, technology partners, and construction professionals in addition to RIDOT, other Rhode Island state and quasi-state agencies, and Rhode Island cities and towns. Rhode Island depends on a strong, independent engineering workforce to safeguard the public and to provide economic growth.

CONTEXT REGARDING RECENT STATEMENTS

Recent testimony and public comments related to RIDOT and its operations have raised questions regarding consulting engineers' scope of services on public infrastructure projects and the systems governing bridge inspection and project delivery. Some of these statements require additional context regarding the roles, responsibilities, and constraints under which our members operate and RIDOT's level of responsibility in overseeing those services on behalf of the Rhode Island public.

For bridge inspections, consulting engineers currently work within the oversight structure established by RIDOT and according to standards set by state and federal laws. Inspections follow specific federally-mandated guidelines and standards. Engineers inspect authorized and accessible elements at scheduled intervals, report findings to RIDOT including areas for potential repair and maintenance and rely on RIDOT to evaluate and act if it deems necessary based on its own judgment and its institutional knowledge of the structures as consistent with federal guidelines and standards. RIDOT's role in inspections and in supervising all projects involving federal funds cannot be delegated to consultants. Federal law is clear that RIDOT has the



responsibility to administer all Federal-aid projects with a full-time state engineer to be responsibly in charge of projects to insure that projects receive adequate supervision and inspection.¹ Greater transparency in how inspection data is reviewed and the limitations of engineers scope in inspections as directed and supervised by RIDOT would strengthen public trust. The Washington Bridge situation, as an example, reflects systemic issues and a lack of technical knowledge as some key staff are not engineers and a lack of institutional knowledge because of staff turnover at RIDOT, not a lack of engineering competence in the industry.

THE NEED FOR REFORM IN RIDOT’S PROJECT-MANAGEMENT MODEL

RIDOT’s current project-delivery framework centralizes authority with non-technical professionals. Going forward, ACEC-RI suggests clearer project-management roles, improved communication pathways, modernized data systems, and adoption of best practices used in peer states. Specifically, projects should be led and managed by engineering professionals to ensure that engineering issues are a focus, in addition to the current focus on schedule and budget.

NECESSARY RHODEWORKS REFORMS

To strengthen RhodeWorks, ACEC-RI recommends enhanced capital planning aligned with transparent project prioritization based on risk and life-cycle cost, independent quality-assurance reviews, an improved organizational structure, and clear timelines for responding to inspection findings.

A PATH FORWARD

ACEC-RI and its member firms stand ready to support legislative oversight and reform through technical expertise, participation in working groups, and sharing industry best practices. Our members value their respective working relationships with the professionals within RIDOT and look forward to working with them and with you to improve the processes for all involved.

¹ 23 CFR Ch.1, Section 635.103 Supervising Agency (a) The STD has responsibility for the construction of all Federal-aid project, and is not relieved of such responsibility by authorizing performance of a local public agency or other Federal agency. The STD shall be responsible for insuring such projects receive adequate supervision and inspection to insure that projects are completed in conformance with approved plans and specifications. (b) Although the STD may employ a consultant to provide construction engineering services, such as inspection or survey on a project, the STD shall provide a full-time employed State engineer to be in responsible charge of the project.; FHWA Memorandum, August 4. 2011 Responsibly in Charge defined, “ For projects administered by the STA, the regulation requires that the person in “responsible charge” be a full-time employed state engineer. This requirement applies even when consultants are providing construction engineering services”... Regardless of whether the project is administered by the STA or another agency, the person designated as being in "responsible charge" is expected to be a public employee who is accountable for a project. This person should be expected to be able to perform the following duties and functions: • Administers inherently governmental project activities, including those dealing with cost, time, adherence to contract requirements, construction quality and scope of Federal-aid projects; • Maintains familiarity of day to day project operations, including project safety issues; • Makes or participates in decisions about changed conditions or scope changes that require change orders or supplemental agreements; • Visits and reviews the project on a frequency that is commensurate with the magnitude and complexity of the project; • Reviews financial processes, transactions and documentation to ensure that safeguards are in place to minimize fraud, waste, and abuse; and • Directs project staff, agency or consultant, to carry out project administration and contract oversight, including proper documentation”.



Rhode Island's engineers live and work in the communities you represent, and their partnership is essential to restoring confidence in the State's systems and processes.

Thank you for your attention to our comments. I am available to provide further information or discuss these issues at your convenience.

Sincerely,

A handwritten signature in blue ink, appearing to read "R. J. Holt", followed by a long horizontal line extending to the right.

Ryan J. Holt
Executive Director
American Council of Engineering Companies of Rhode Island
RJH@TheHoltFirm.com

CC:

Members of the Rhode Island Senate Housing and Municipal Government Committee
Members of the Rhode Island Senate
The Honorable Daniel J. McKee, Governor
Robert Rocchio, P.E., Interim Director, Rhode Island Department of Transportation
Steven Hayes, Esq., Senate Legal Counsel