

## Correspondence



### **RABBIT CREEK COMMUNITY COUNCIL (RCCC)** A Forum for Respectful Communication & Community Relations



**1057 West Fireweed Lane, Suite 100 / Anchorage, AK 99503**

Anchorage Metro Area Transportation Solutions  
P.O. Box 196650  
Anchorage, AK 99519

September 20, 2021

Dear AMATS:

Thank you for the opportunity to submit comments on the public review draft of the Anchorage Metro Area Transportation Solutions (AMATS) Transportation Improvement Program (TIP) Scoring Criteria Update. Rabbit Creek Community Council (RCCC) members discussed and considered the draft Scoring Criteria at the Council's meeting on September 13, 2021. The Council voted to submit the following comments by a vote of 19 yeas, 6 nays and 1 abstention.

We have several general comments on the scoring criteria, including a summary of changes we recommend. These are followed by a number of specific comments on each of the five categories on which AMATS will be ranking projects, relative to how well they achieve the goals of our adopted municipal and state plans, including safety, less dependence on vehicle travel (essential if we are to meet local, state and national goals to address climate change), cost-efficiency, and sustainability. These are followed by a summary of changes we recommend. The specific wording improvements we hope you will incorporate are included in an Attachment.

#### **GENERAL COMMENTS**

We found this document to be somewhat confusing given lack of any explanatory introduction, use of professional terminology and measures, and lack of real life examples. Thus we have three general recommendations.

- 1) To ensure the Scoring Criteria are clearly understandable, the final iteration should be edited for clarity by people who have not worked on drafting and editing them thus far.

We understand that AMATS staff use numerous professional terms in their daily work. Nonetheless, the Scoring Criteria should be clear to laypersons. Many of these draft criteria are poorly worded. For example, under SAFETY, for BICYCLE/PEDESTRIAN projects, the wording is vague and ungrammatical. It seems that the proposed capital projects should separate users, not separate conflicts. This is just one example: this letter notes several other instances where the Scoring Criteria are similarly unclear (see Specific Comments).

- 2) The public review should include examples of real projects.

It is hard for the public to evaluate these Scoring Criteria without real-life examples. Did AMATS test these draft Scoring Criteria on multiple projects to see if the scores match the outcomes called for by the public, and our adopted plans? The public should be able to preview those scores. These criteria should be aimed to specific measurable outcomes.

For example, regarding bicycle/pedestrian uses, it would be helpful to provide an example of a



project area or specific road where there have been three or more non-motorized crashes in 5 years and the specific features of a proposed project that would help separate conflicts between freight and non-motorized uses. Or, it would be helpful to explain for such high crash areas, what would constitute “high total effectiveness of bicycle safety countermeasures.”

- 3) In general, the scoring criteria need to be more specifically tied to our major community goals: sustainable, healthy, equitable and cost-effective investments.

The adopted land use pattern in the Municipality’s (Muni) Land Use Plan Map (LUPM) and the Comprehensive Plan is to promote infill and redevelopment in the city centers, and less dense land use in the outlying areas. Two important transportation goals are reduction in vehicle miles traveled and reduction of Greenhouse Gas Emissions (GGE). Vision Zero is another adopted safety goal. These Goals need to be specifically added to the Statement of Purpose for each respective Scoring Category.

### SUMMARY OF RECOMMENDED CHANGES


Following are a number of areas where we believe the scoring criteria would be improved by adding or subtracting points for additional project features in keeping with more in line with our municipal goals of safety, less dependence on vehicle travel, cost-efficiency, and sustainability. Additionally, we have identified several areas where criteria need to be better defined with specific details.

- Add points for pedestrian safety. Specifically, add points for safety in School Zones, to create safe walk-to-school opportunities at all schools. Traffic controlled intersections, grade-separated crossings, and separated pathways should receive extra points when they connect neighborhoods to schools.
- Add points for reducing Single Occupancy Vehicles. This is a policy of the Metropolitan Transportation Plan (Policy 5-1). The TIP Mobility Category reiterates this in its purpose statement. However, the draft Mobility scoring fails to award any points for reducing Single Occupancy Vehicles in accord with this goal.
- Add points for improving transit travel times to make them competitive with vehicular travel times. Don’t settle for ‘reducing transit delay.’
- Be more specific about what projects will earn points for Greenhouse Gas Emission reductions. Adding lanes to reduce congestion should not earn points for reducing GHG: it induces more driving.
- Be more specific about points for reducing Vehicle Miles Traveled, not just systemwide, but within parts of the city.
- Give negative points for projects that convert or damage wetlands, park lands, natural open space, established residential areas, and commercial land within designated commercial centers.
- To ensure livable neighborhoods and thriving commercial districts, give negative points for projects that will create backed-up or cut-through traffic, or will reduce access to retail commercial areas.

- Give positive points for projects that make optimal use of the existing roadways, for example with reverse-direction lanes to handle commuter traffic flow. This scoring can be awarded under the Economic category.
- Regarding Preservation, give more specific guidance on scoring projects that support the Climate Action Plan and resiliency: projects that can handle intense precipitation events, hotter summers, freeze-thaw winters, and high winds.
- Regarding Preservation, give standards of improvement for repairing sidewalks and off-street facilities and not just for roads.

Thank you for your thorough consideration of our comments. With the possibility of significant federal infrastructure funds available in the next several years, it is even more important that AMATS TIP Scoring Criteria reflect the needs of our community as addressed in current municipal and local plans. If you have any questions or would like to discuss these further, please feel free to contact us ([Rabbitcreekcc@gmail.com](mailto:Rabbitcreekcc@gmail.com)).

Sincerely,



Ann Rappoport, Co-Chair  
Rabbit Creek Community Council



Carl Johnson, Co-Chair  
Rabbit Creek Community Council

Attachment

- cc: Craig Lyon, AMATS Coordinator  
Aaron Jongenelen, Senior Planner  
Director, Project Management and Engineering  
John Weddleton, Anchorage Assembly  
Suzanne LaFrance, Anchorage Assembly  
Matt Cruikshank, Chair, Community Advisory Committee  
Mike Fenster, District 6, Community Advisory Committee



## Specific Wording Improvements Recommended for AMATS TIP Scoring Criteria Update

### SAFETY CRITERIA

Critique: There is nothing in these proposed criteria to promote School Zone safety. Some Anchorage schools have NO designated School Zones with safe walking routes to school. Therefore, there is no crash data that would qualify potential School Zones for safety improvements. It's a Catch-22 that needs to be fixed.

Proposed changes:

Add points for pedestrian safety, and for School Zone Safety, as follows –

- Within 0.5 miles of any school;
- Negative 2 points for speeds above 25 mph or increased traffic volumes on roads that are not safe for students walking to schools and parks;
- Plus 2 points for each new traffic-controlled intersection or grade separated crossing that meets Safe Routes to Schools standards (<https://www.transportation.gov/mission/health/Safe-Routes-to-School-Programs>); and
- Plus 2 points for each student-safe pedestrian pathway, which would include pathways detached from curb or physically protected from roadways.

### MOBILITY CRITERIA

Critique: The statement of purpose lacks any commitment to reduce dependency on vehicles. The statement of purpose needs to list MTP Goal 5, which contains the policy for reducing single occupancy vehicle travel. There are no points awarded for one of the supposed main mobility purposes, “supports non-single-occupant vehicle travel.”

It is unclear as to what triggers a finding of negative impact on an Environmental Justice area.

Points awarded to reduced transit delay are too limited in scope and magnitude. New capital projects should not be limited to reducing transit delay; rather such projects should be helping transit to achieve parity with the travel time for vehicles. If buses or trolleys or trains are a fast way to go, that is a powerful incentive for travelers to shift from vehicles to transit.

Proposed changes:

- Award generous points (up to 5 points) for reducing mode share of single occupancy vehicles through transit network improvements, and for road design features such as carpool and transit lanes, and Park and Ride Parking.
- Award generous points for decreasing GHG emissions by any design features that reduce VMT.
- Award generous points to bring parity or superiority for transit travel time versus vehicle travel time or support for electric vehicles.
- Define what the negative impacts are for Environmental Justice areas.

### ECONOMIC CRITERIA

Critique:

The Statement of Purpose neglects referencing important MTP Goals and benefit-cost ratios and

project life-cycle costs. Negative community costs are a key part of any economic considerations but were not included in these criteria. not accounted in this criteria as they should be. The economic costs of GHG emissions need to be addressed, from the aspects of both negative and positive points.

Proposed changes:

- The statement of purpose should cite MTP Goal 6, with specific iteration of optimizing the benefit-cost ratio and the life-cycle costs of the proposed projects.
- The statement of purpose should also cite MTP Goal 5, which calls for minimizing adverse impacts on existing communities and the natural environment, and for matching the project scale and design to the surrounding community.
- The scoring criteria should include benefit-cost ratio and and project life-cycle costs which are specifically called for in the MTP Goal 6, “Make sound public investments”.
- The scoring criteria should apply negative points to projects that raise future costs to the community, including the following costs:
  - More Vehicle Miles Traveled (VMT), and any increase or sustained level of Greenhouse Gas Emissions;
  - Maintenance costs, with positive points given to low-maintenance green infrastructure such as vegetated drainage swales;
  - Loss of residential housing, wetlands, or parklands;
  - Loss of commercial land within designated commercial centers;
  - Backed-up or cut-through traffic in residential zones, and school zones; and
  - Impeded or restricted local access in retail commercial areas.
- Give positive points for projects that increase transportation capacity without requiring additional acreage. Specifically, projects that improve peak traffic flow without expanding roadway footprint (design features such as reversible lanes which match peak traffic flow direction; or High-occupancy vehicle and transit lanes).
- Give negative points to projects that induce additional VMT, because of the loss to productivity, the additional transportation investment and maintenance costs, and the GHG emissions.
- Award points for decreasing GHG emissions by any design features that reduce VMT, or bring parity or superiority for transit travel time versus vehicle travel time or support for electric vehicles.

## ENVIRONMENT CRITERIA

Critique:

The air quality points should be tied to the reduction of actual emissions. The current suggested criteria are not linked to measurable improvements, and probably will not produce any. For example, simply providing a bicycle or pedestrian path will not necessarily result in meaningful emissions reductions from vehicles, unless there is a very large mode shift.

Under the Environment category in the draft proposal, air quality points will be awarded solely within health equity focus areas. This is far too narrow. Air quality should be protected citywide, any project that increases rather than decreases air quality should get negative points. In addition, Greenhouse Gas Emissions are a problem no matter where they are emitted.

There is no accounting for the impact of increased lane miles of asphalt or acreage of roadways. The footprint of the roadway system should be part of our environmental concern. The category of land use impacts is vague and too subjective: “limited or no impact to ROW, wetlands, historic properties or other environmentally sensitive areas.”



The 4 points possible for “implementing the Climate Action Plan” are too vague. The vehicular transportation system in the AMATS area accounts for 53% of Anchorage’s Greenhouse Gas emissions (Municipal calculation in 2021).

The 4 points possible for “systemwide VMT reduction” are too vague. This will penalize smaller projects like a midtown bus lane circuit that might decrease cars primarily within midtown; or a School Safety Zone that allows a majority of school kids to walk to school.

Proposed Changes:

- Air quality points should be earned only by projects that result in long-term reduced emissions, not by expanding roadway capacity which induces more driving. Air quality points should be expanded to include GHG, not only particulates.
- Add specificity to the land use impact criterion. This criterion currently awards points to “limited impacts to sensitive areas.” This fails to capture the intent of a compact land use pattern that has higher density for residential and commercial uses. Encourage the smallest possible footprint for the road network and parking areas. Award points for:
  - staying within the existing developed ROW;
  - no increase in impermeable surface;
  - maximal use of vegetated, permeable, and low-heat absorption materials for medians, drainage, and other surfaces outside of the travel lanes;
  - no loss of wetlands or park lands, or natural open space; and
  - features to protect and maintain wildlife movement.
- Give more specific criteria for how projects can earn or lose points from their GHG emissions and their compliance with the Climate Action Plan.
- Give points to projects that enable transit travel time to equal or surpass vehicular time.
- Give points or credits for reducing GHG emissions through reduced vehicular miles traveled and reduced single-occupancy vehicle trips.
- Specify that there are no GHG points for reducing congestion on roadways by expanding roadway capacity. Expanding road capacity gives only temporary congestion relief, and quickly leads to more driving. This is statistically demonstrable in dozens of urban areas over the past 20 years.

**PRESERVATION CRITERIA**

Critique:

The preservation section gives an expected standard of improvement for pavement repairs (from poor to good, or from poor to fair); but it sets no standards for improving sidewalks and off-street facilities. Also, a definition of off-street facilities is needed.

The category of “Utilities coordination - help to improve utilities in the area” is too vague. This category does not seem to belong in the Preservation category; a more appropriate location would seem to be within the Economics criteria.

Proposed Changes:

- Clearly state what level of improvement is expected to gain points for quality of sidewalk and off-street facilities. Define what off-street facilities are eligible.
- Instead of Utilities coordination points, apply additional points in the Resiliency category. Award points for materials and design features that will withstand the impacts of climate change: worsening summer heat, winter freeze-thaw conditions, intense run-off, and higher winds.