

Correspondence



RABBIT CREEK COMMUNITY COUNCIL (RCCC)

A Forum for Respectful Communication & Community Relations

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

Aaron Jongelen, Director
Christine Schuette, Communications Coordinator
Anchorage Metropolitan Area Transportation Solutions:

January 13, 2023

Dear Aaron and Christine:

The Rabbit Creek Community Council has thoroughly reviewed and discussed the draft Amendment #1 to the Anchorage Metropolitan Area Transportation Solutions (AMATS) Transportation Improvement Program (TIP) 2023-2026 at its November and December regular meetings. The following comments were approved by Council members on November 10, 2022 (12 yeas, 0 nays, 1 abstentions) with additional points added without any objections during a discussion at the RCCC's December 8, 2022 meeting.

Our comments are summarized below. We request that you pay particular attention to the extensive details and documentation included in the Attachment.

Formatting:

The double set of charts, wherein previously approved budgets are shown only in the original TIP document, and revised budgets are shown only in Amendment #1, make it incredibly difficult for the public to understand what and where changes are being proposed. We urge AMATS to include one chart in the Amendment with both the original and new proposed expenditures side-by-side so the public can easily compare these.

Endorsement for TIP Amendment Items:

RCCC strongly endorses several planned activities in the TIP and proposed Amendment #1, as follows and referenced to the 'TIP Need ID.' Specific recommendations and language improvements are provided in the Attachment.

- PLN00021 Climate Action Plan funding – we have provided specific language to ensure rapid implementation and measurable results
- RDY00005 Rabbit Creek Road - RCCC supports the change of this project from reconstruction to rehabilitation, and the accelerated timing to FY 2024 with the explanation that the new category will allow greater flexibility in design standards.
- RDY00018 Mountain Air Drive. RCCC supports the Amendment's addition of \$500K in design funding in FY2023 and \$1.5 million ROW funding in FY2025.

Concerns and Recommended Changes for TIP Amendment Items:

RCCC found several planned activities in the TIP to be problematic relative to other approved Municipal plans and policies, or lacking in sufficient explanations/justifications. We urge you to accept our recommendations to improve these projects, briefly described below and detailed in the Attachment. We also recommend dropping one project and adding another.

- RDY00012 Pavement Replacement Program – decreasing this program works against the MTP goal of good repair for all modes; we should prioritize repairs over new construction in order to maintain what we have. Deferred maintenance can result in much greater costs later.
- NMO00008 Anchorage Areawide Trails and Pathway Pavement Replacement – RCCC objects to the proposed significant reduction in funding for 2023 with further decimation of these funds in subsequent years. Similar to our roadways, we need to maintain what we have for our trails. Where available, carbon reduction funds should be applied to these needs.
- PLN00019 Inventory of Non-Motorized Easements - reinstate the map inventory of non-motorized easements and right-of-ways, as directed by the Policy Committee just 3 months ago.
- Better and Complete use of Carbon Reduction Program (CRP) funds.
- NHS0004 92nd Avenue Interchange and Seward Highway, O'Malley to Dimond Blvd reconstruction, with a full interchange at 92nd Ave is no longer justified by traffic or use patterns in the area. This project should be deleted as proposed and redesigned with a non-motorized underpass to connect Academy Drive and 92nd Avenue, to better and more safely serve the community.
- Significant cost escalations over time should be explained.
- New project needed: Fund development of a municipal long-range transportation plan.
- PLN00010. The scope of work for the MTP 2050 Update in 2024 should specifically commit to incorporating two anticipated plans: the AMATS Climate Action Plan, and a new Anchorage Long-range Transportation Plan (recommended above).

Thank you for your attention to our concerns as highlighted above and detailed in the Attachment and additional Analyses. We would be happy to meet with you to further discuss our comments.

Sincerely,



Ann Rappoport, Co-chair

Cc: Suzanne LaFrance, Anchorage Assembly
 Randy Sulte, Anchorage Assembly
 Meg Zaletel, Anchorage Assembly

ATTACHMENT

Following are specific and more detailed recommendations for the items summarized in the preceding letter.

Formatting

The double set of charts, wherein previously approved budgets are shown only in the original TIP document, and revised budgets are shown only in Amendment #1, make it incredibly difficult for the public to understand what and where changes are being proposed. The tandem charts require visual ping-pong to compare the original TIP funding charts with the Amendment funding charts and mental math. We strongly recommend that AMATS include one chart in the Amendment with both the original and new proposed expenditures side-by-side in the same data cell so the public can easily compare these.

Comments on Ten Specific TIP Projects

1. **PLN00021 Climate Action Plan:** The proposed funding for an AMATS Climate Action Plan is very welcome. Please ensure that this Plan emphasizes data-proven measures to reduce greenhouse gas emissions and includes quantitative targets and monitoring. RCCC requests specific language (italics below) be added to the scope of work, to ensure rapid implementation and measurable results:
 - a. *The Climate Action Plan will include best practices, specific targets for greenhouse gas reductions, monitoring protocols, and resiliency guidelines.*
 - b. *Best practices. The scope of work should include compiling a 'menu' of best-practices that have proven effective in transportation systems elsewhere.*
 - c. *Targets. Commit to specific greenhouse-gas reduction targets in line with Municipal and national goals.*
 - d. *Monitoring. Commit to measuring and reporting gas emissions and Vehicle Miles Traveled.*
 - e. *Resiliency. Include resiliency measures, such as new materials and nature-based solutions to mitigate and withstand stresses of climate change.*

2. **RDY00012 Pavement Replacement Program**
 - a) **Road repairs:** The Metropolitan Transportation Plan (MTP) 2040 has a goal to “reserve the existing system... maintain a state of good repair for all modes”. This proposed Amendment #1 works against good repair by reducing the Pavement Repair Program by 38% in 2023 (from \$16M to \$10M), with additional reductions in 2024-2026. Poor road conditions work against the safety goals and the economic development goals of the AMATS MTP and against the Municipal Vision Zero goal for zero bike and pedestrian deaths.
 - b) The decrease in the Pavement Repair Program is obscured from public understanding by the word choice and lack of details: “Balance the program [roadway budget] with RDY00012 Pavement Replacement Program” is not a clear statement for the lay public. Before this funding reduction can be approved, the specific schedule of repairs needs to be provided so the public can see which roads will further deteriorate.
 - c) Adopt a higher AMATS target for the percent of roads in good repair, instead of the DOTPF standard of good repair for 15% of non-highways and 20% of highways. A higher target for percent of roads in good repair should be part of the MTP 2050.
 - d) Adopt an MTP 2050 goal to prioritize repairs over new projects.

3. **NMO00008 Anchorage Areawide Trails and Pathway Pavement Replacement:** RCCC does not support sharply reducing the pathway pavement repair to fund new projects. The reductions to the minimally funded trail repair program are radical: over 65% in 2023 (from \$1.7 million to \$600,000); with an additional reduction of 50% in 2024 and over 40% in 2025 from the originally proposed budget. The wording of the Amendment obscures the effect on pathway repairs: “Balance the program [Non-Motorized budget] with NMO00008 Anchorage Areawide Pathway and Trails Pavement replacement.”
 - a. RCCC supports the concept of fixing existing trails before we expand the pathway system. De-funding the Pathway Pavement Replacement program runs counter to the adopted goal of MTP 2040 to, “Preserve the existing system . . . maintain a state of good repair for all modes.”
 - b. The Amendment works contrary to the priority on pedestrian and bicyclist safety that the public widely supports. The Municipality has adopted a Vision Zero target: keeping pathways in good repair is critical to this target.
 - c. List which trails will further deteriorate before approving these reductions.
 - d. Adopt MTP goals and scoring systems to require a high percentage of trails to be kept in good repair.
 - e. Consider the use of Carbon Reduction Funds, where available, for trail repairs.
4. **PLN00019 Inventory of non-motorized easements:** Reinstate the map inventory of non-motorized easements and right-of-ways (ROW), as directed by the Policy Committee just 3 months ago. AMATS and Muni staff have dismissed the Policy Committee decision by erroneously claiming that this work is “done.” While the Muni has data on undeveloped ROW and easements, it is not compiled on any one map or in a form readily available to planners or the public. Further exacerbating this lack of information essential for both local and areawide planning is that there is no municipal transportation planner to coordinate among the varied transportation planning processes and programs. Moreover, the position of Non-Motorized Coordinator remains vacant so maps are the only avenue for learning or confirming potential non-motorized connections, and ensuring they are documented on proposed plats and plans. See further analysis (A) below.
5. **Better and Complete use of Carbon Reduction Program (CRP) funds:** Carbon Reduction is an urgent need and a responsibility to future generations. Consequently, we are baffled that Table 1 of the Amendment shows a revenue, or unspent, \$2.722 million of CRP funds. These funds should be effectively expended in 2023 for maximum Greenhouse Gas (GHG) reductions. For example, as noted above and detailed below, these funds could be used to cover unfunded trail maintenance, or to develop or repair other trails that serve commuters.
 - a. Replace CRP funds in project OFS0004 with State Transportation Block Grant (STBG) funds. This project is a 260-foot re-alignment of the driveway to the Bureau of Land Management and Campbell Creek Science Center, to align with East 68th Ave. The carbon funds are currently proposed to pay for a 6-foot shoulder on that new driveway, for bicyclists. A bikeable shoulder should be a de facto part of the project. The project is merited for making a safer intersection, but it will not create a mode shift which is the intent of the CRP. The shoulder should be funded with STBG funds, thus allowing \$1.139 million in CRP money to become available for alternative modes of transportation or transit.
 - b. Spend the unallocated CRP funds (\$2.722 million and \$1.139 from project OFS00004) on specific Non-Motorized projects that are currently funded with STBG funds, as well as on a Transit Plan (see below). For example, switch CRP funds into

the Fish Creek Trail to replace the current STBG funds for that project. This will free up STBG funds that can be added back into the Non-Motorized Pavement Repair program to fund repairs at the original intended level. Since there is no Municipal transportation planner, we encourage AMATS to meet with bike/pedestrian advocates as well as advocates for the disadvantaged to identify how a transit plan and strategic site improvements could improve equity through low-carbon transportation improvements.

- c. Fund a Transit Plan to address intended reductions in parking recently passed by the Municipal Assembly. Reduced parking is a way to drive down automobile use in the urban parts of Anchorage, but it must be accompanied with improved transit.
6. **NHS0004 92nd Avenue Interchange and Seward Highway, O'Malley to Dimond Blvd reconstruction, with a full interchange at 92nd Ave.** We strongly urge AMATS to delete this project as proposed and to instead, re-design it as a non-motorized corridor. This would signal an enlightenment toward urban freeways. The project cost has escalated to \$113 million while traffic volumes have been dropping in the Dimond and Abbott area since 2014. Even Seward Highway traffic is not projected to justify this project. The interchange will induce further traffic but not shorten any travel times nor ensure pedestrian and bicycle safety. There are so many better transportation uses for that \$113 million. See detailed statistics near the end of this attachment, Analysis (B).
7. **Project cost escalations:** Please explain why there are repeated high-magnitude cost increases AFTER a project is scoped and budgeted. Examples: Fish Creek Trail doubled from \$6 to \$12 million; Rabbit Creek Road more than tripled, from \$9 to \$31.6 million. In previous years, the O'Malley project similarly ballooned by a factor of two or three-fold. Are projects being poorly scoped, or presented piecemeal? Does this require a change in the scoping and scoring used by AMATS?
8. **New project needed: Fund development of a municipal long-range transportation plan,** rather than adopting the AMATS plan as a default local plan. There are many funding changes in this draft TIP Amendment that do not follow the Assembly's Resolution AR 254 recommendations, nor any adopted project-ranking system. This level of budget shuffling looks arbitrary and opaque at best, and corrupt at worst. Other Metropolitan Planning Organizations have municipal Transportation Planners and Municipal Plans that represent urban municipal interests from the neighborhood level up. Anchorage does not have detailed local input. A Municipal Long-Range Transportation Plan is needed.
9. **PLN00010. The scope of work for the MTP 2050 Update in 2024 should specifically commit to incorporating two anticipated plans: the AMATS Climate Action Plan, and a new Anchorage Long-range Transportation Plan (recommended above).**
10. **RDY00005 Rabbit Creek Road.** RCCC supports the change of this project from reconstruction to rehabilitation, and the accelerated timing to FY 2024 with the explanation that the new category will allow greater flexibility in design standards.
 - a. The project scope should specify left-turn pockets and not create a continuous left-turn lane.
 - b. The project scope should include intersection improvements at Golden View Drive, which has a crash history and congestion. These should ensure safe student walking/biking to school.

- c. The project scope should specify separated non-motorized facilities for the full length of the project. Traffic speeds and volumes would render an attached pathway unsafe and highly stressful for nonmotorized users.
 - d. Include pedestrian crossing points.
 - e. Use design elements to ensure moderate speed limits appropriate to the high density of driveways and intersections.
11. **RDY00018 Mountain Air Drive.** RCCC supports the Amendment’s addition of \$500K in design funding in FY2023 and \$1.5 million ROW funding in FY2025.
- a. This is a high priority project for RCCC because it provides emergency access/ingress for a large area east of Golden View Drive.
 - b. This project scope should include at least one emergency, low-cost connection from Bear Valley, as Bear Valley has only one way in/out. RCCC’s Resilience Committee, which includes participation from other Hillside Community Councils, has been working on a wildfire egress project with the University of Anchorage Alaska’s Institute of Social and Economic Research (ISER), the Anchorage Fire, Police, and Emergency Services Departments and other experts to identify and map needed emergency egress sites. That report will soon be finalized and should be considered as this project proceeds.

(A)

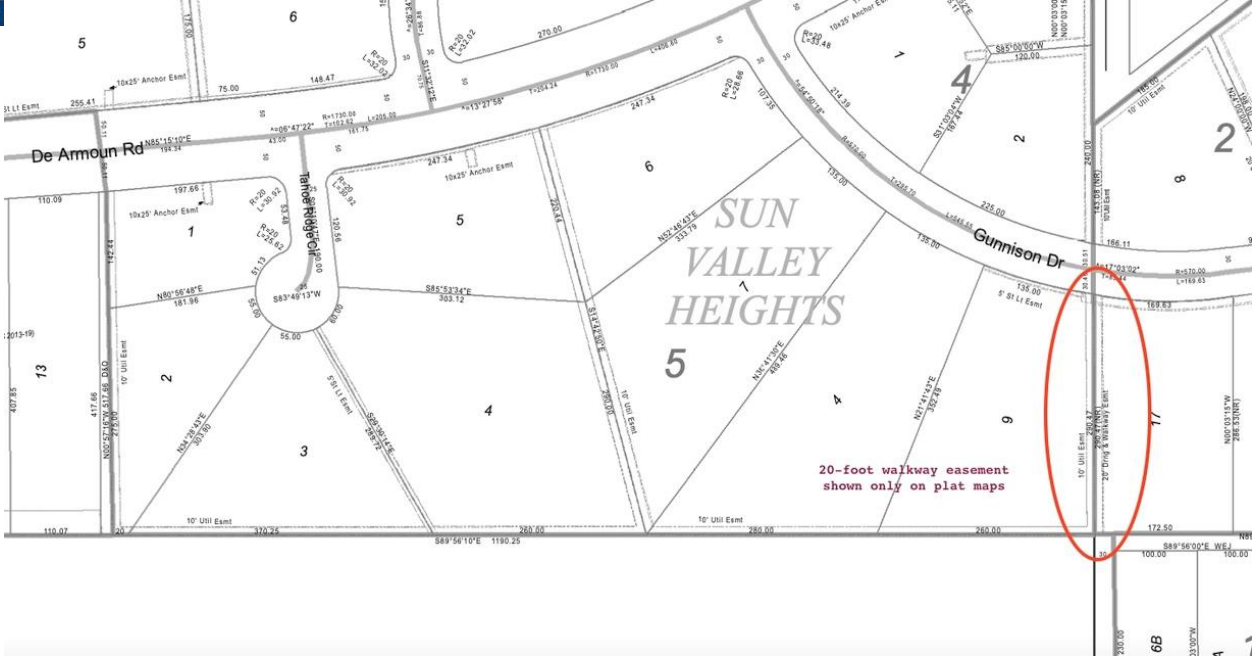
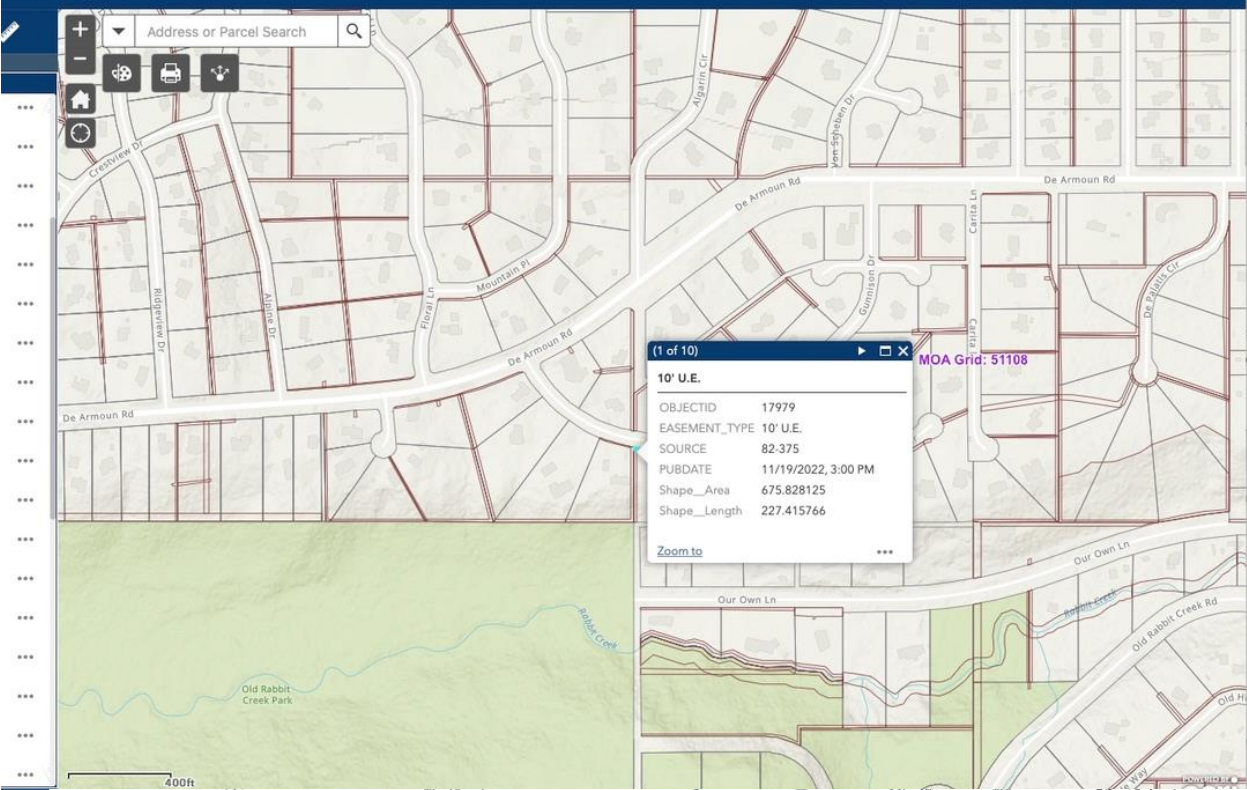
Further data and analysis of the non-motorized inventory issue (PLN00019)

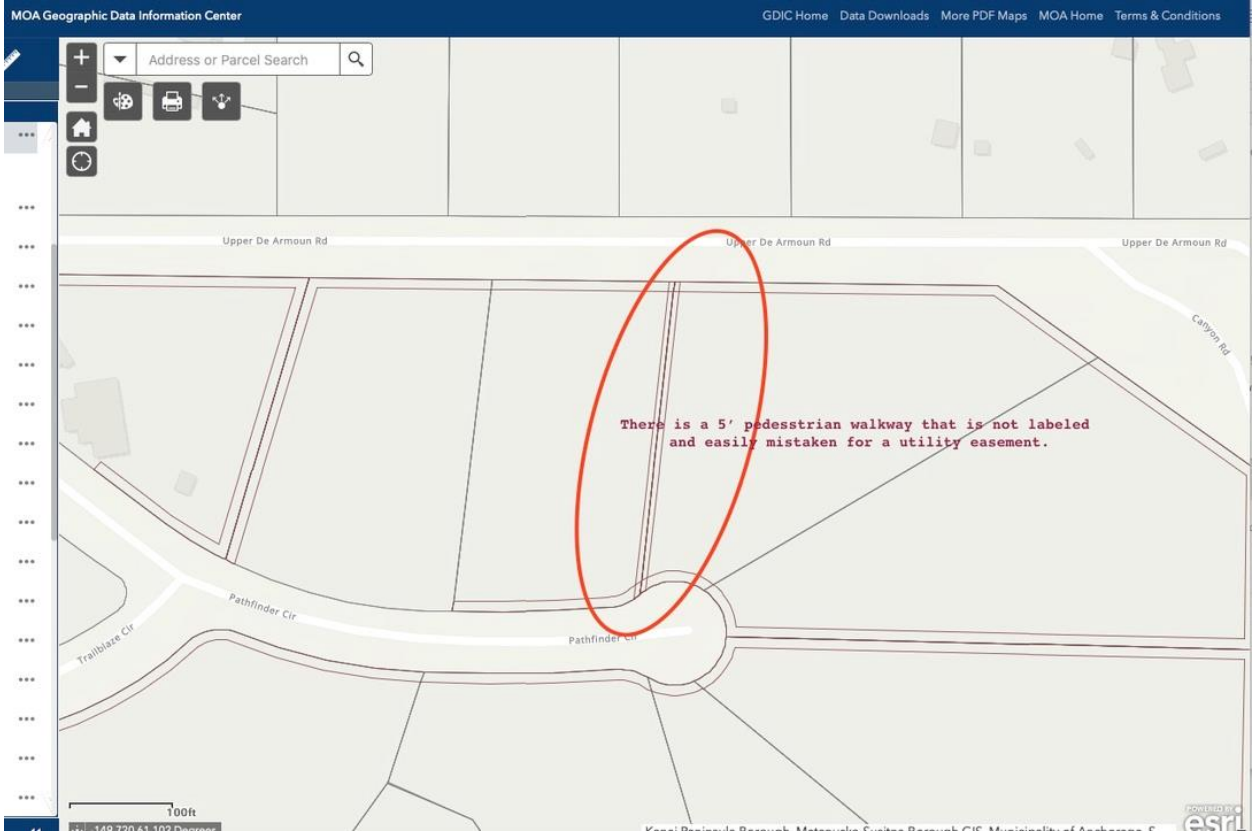
Remove the erroneous language that the inventory is “already done.” Fund the inventory, as requested by the Municipal Assembly and approved by the Policy Committee.

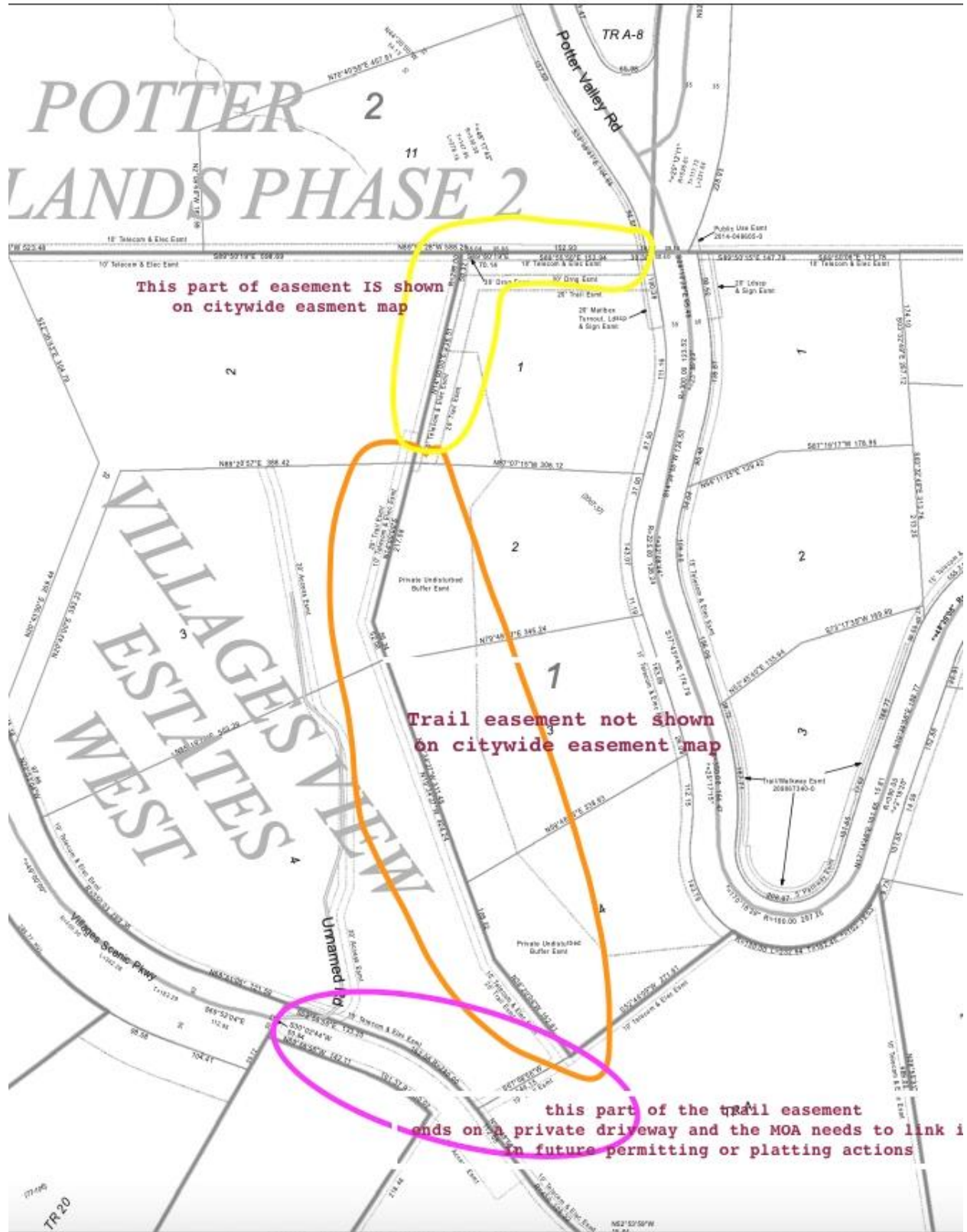
- a. The easements portion is NOT done. The non-motorized easements are hidden in the fine print of hundreds of plat maps in MOA data bases where they are unknown and not readily accessible to the public and to planners. Although Muni ROW staff have said they know where to look for the easements, that denies the problem of invisibility of these potential access connections to the public, landowners, private and Municipal planners, and permit reviewers.
- b. The claim that mapping undeveloped ROW would “require field surveys that would take ten years and millions of dollars” is highly specious. These existing legal ROW are already platted and recorded, just not yet mapped in a way that’s useful for planning non-motorized connections.
- c. The recent Emergency Egress project led by ISER has created maps for connectivity planning purposes, with many types of easements, including some undeveloped ROW and some trails, as well as utility easements. If ISER can depict ROW for planning purposes, so can AMATS.
- d. RCCC has submitted multiple examples of undeveloped easements and ROW that are hard to find on municipal maps, and therefore are overlooked by Planning Staff, permit reviewers, and the public when non-motorized connections are considered. See examples at the end of this analysis.

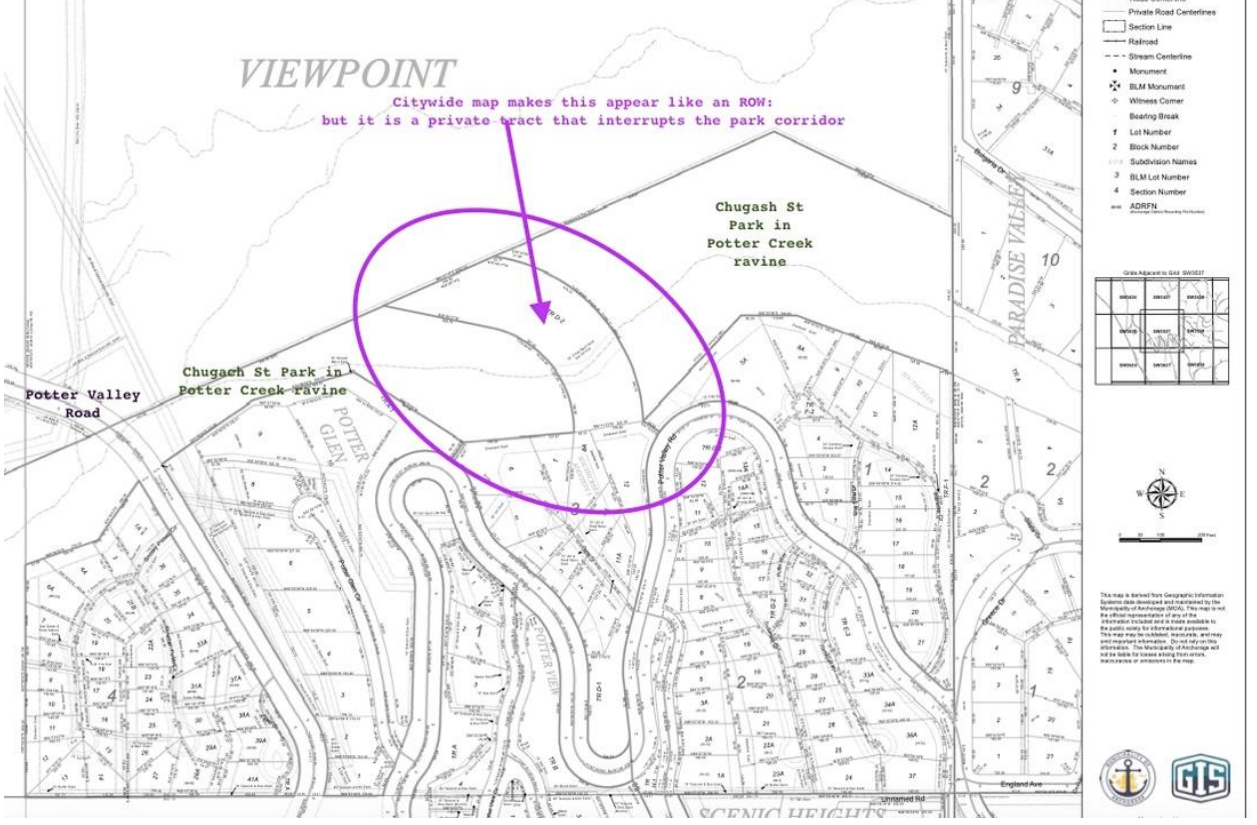
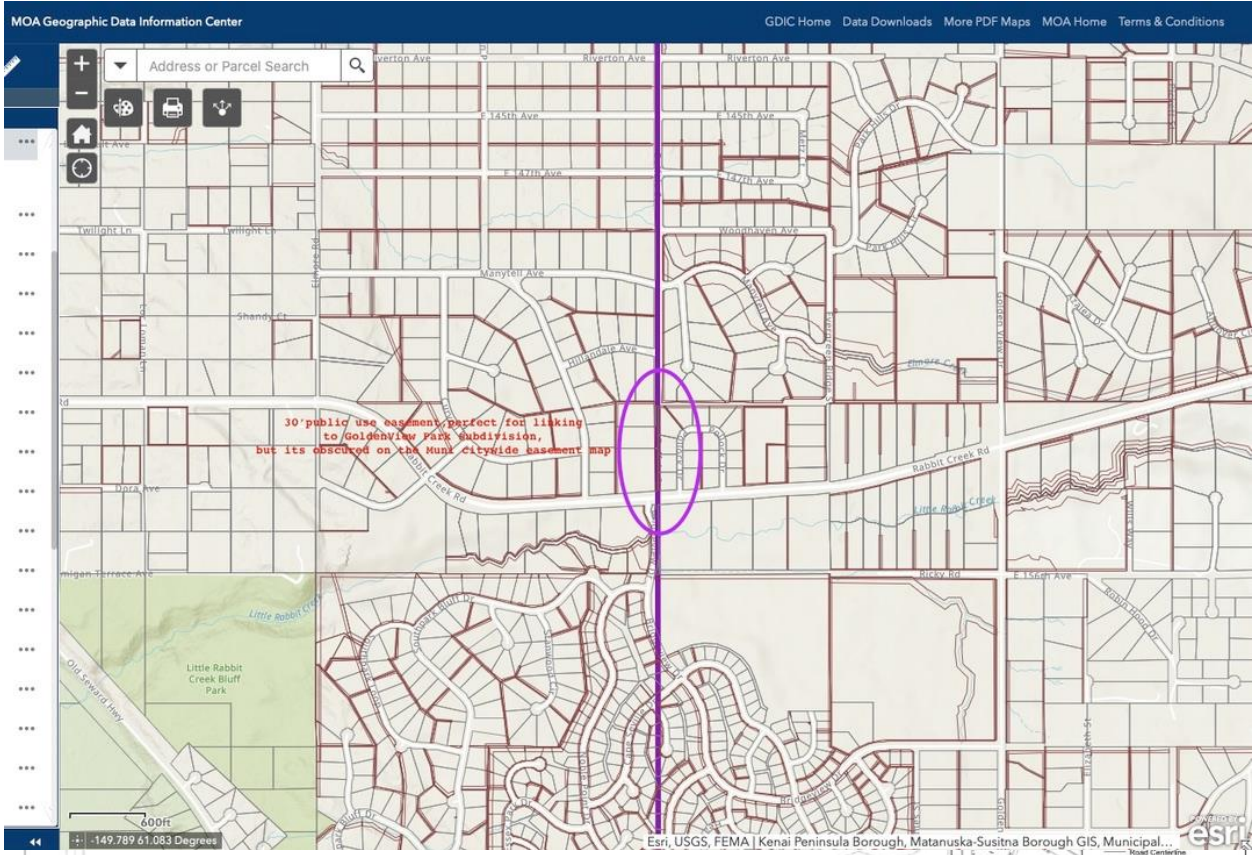
Additional documentation for non-motorized inventory mapping (PLN00019)

Following are examples of non-motorized easements and undeveloped ROW that are not clearly depicted on Municipal maps. These are the types of valuable connections that are overlooked during transportation planning. They are also at risk of being lost through encroachments or motions to vacate.









(B)

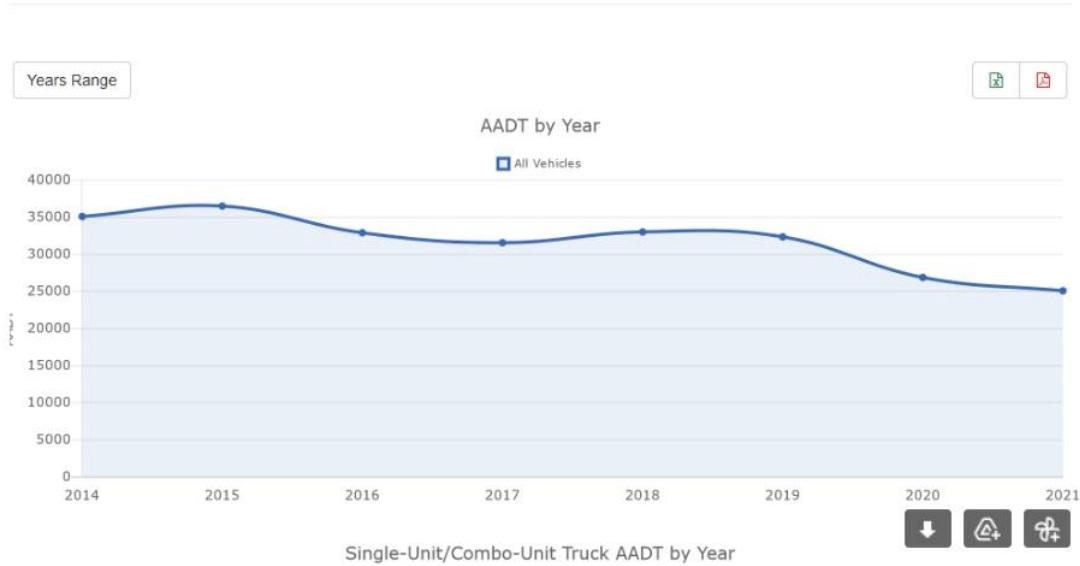
Further data and analysis of NHS0000, Seward Highway and the 92nd Avenue interchange

1. Traffic and Population demand is flat as shown in data referenced below; and ADOT traffic counts:

- Dimond Boulevard: declining traffic going east-west on Dimond since 2016; traffic on the stretch from Old Seward Highway to Abbott Road peaked in 2016.

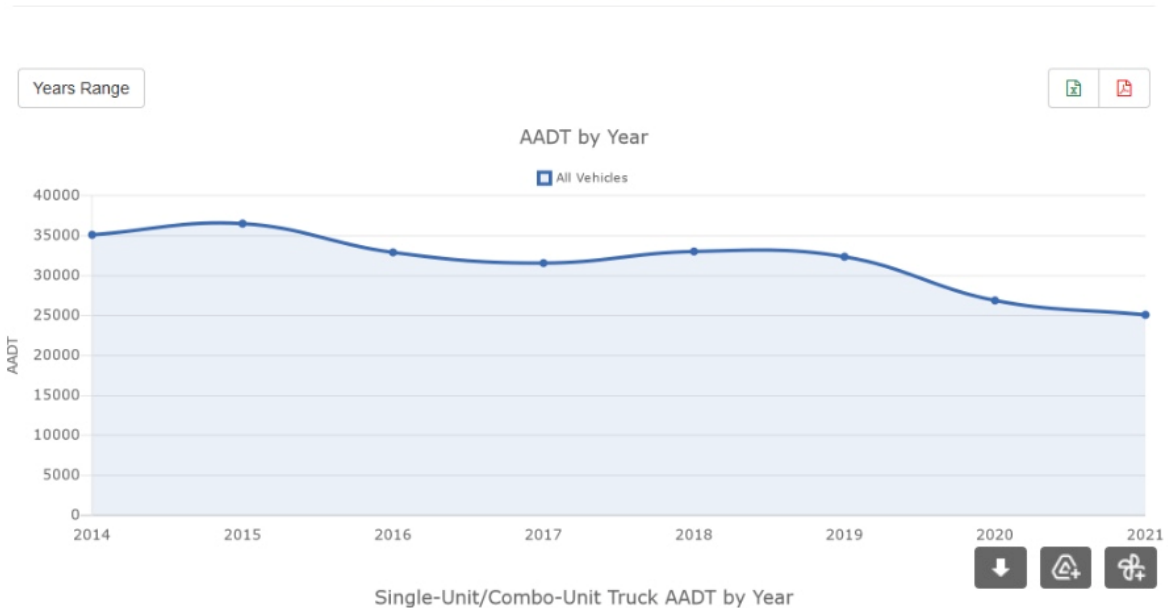
Between Old Seward & Seward Hwy on Dimond

ADT Charts Report AKDOT_ST 000053359000



Between Vanguard & Seward Hwy on Abbott

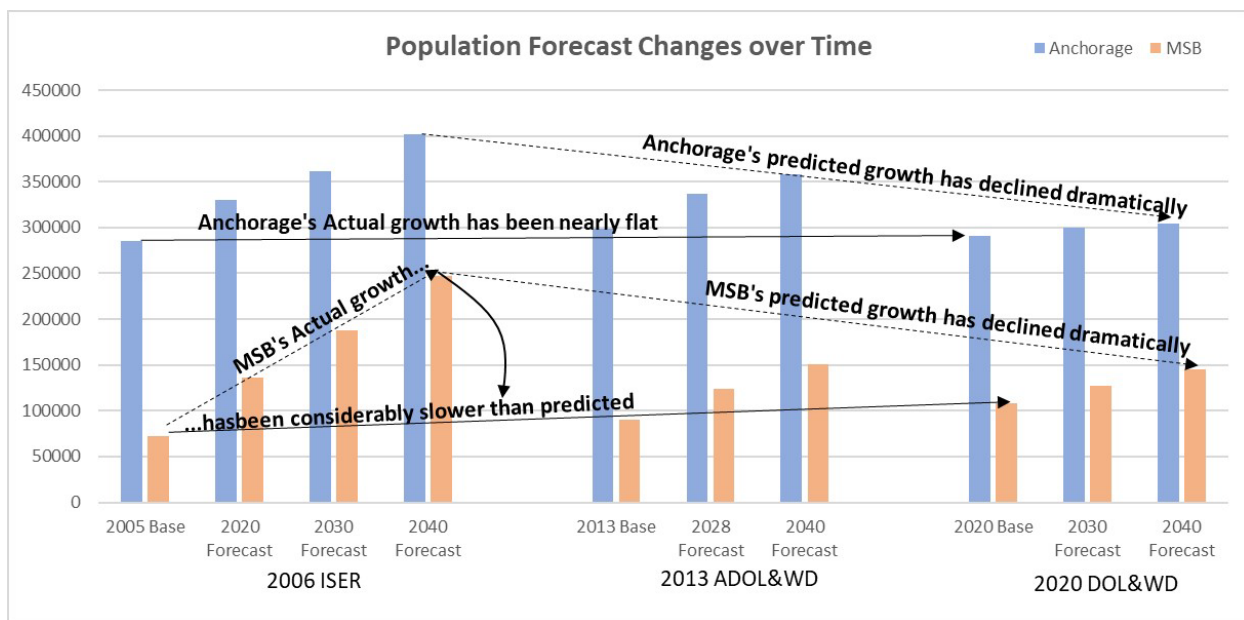
ADT Charts Report AKDOT_ST 000053359000



- Seward Highway: Traffic on the Seward Highway is projected to decline by 2050, according to the newest 2020 mobility study
 "...fewer trips are predicted to use the Seward and Glenn Highways in Anchorage.
 "... The Seward Highway is predicted to have similar growth (from approximately 49,000 trips per day just before the COVID-19 pandemic to 48,500 trips per day in 2050)"
 (Sewardglennmobility.com May 2020 draft system performance memorandum, p 25-26).

The latest socio-economic projections for 2050 come from the Alaska Department of Transportation & Public Facilities (ADOTPF) sewardglennmobility study. It shows very little population growth in Anchorage, and much slower growth in the Mat-Su than previously predicted.

FIGURE 10: POPULATION FORECAST USED FOR SG PEL COMPARED TO PREVIOUS POPULATION FORECASTS (from sewardglennmobility.com, page 20).



This figure compares a forecast made in 2006 by the Institute of Social and Economic Research (ISER) and a forecast prepared in 2013 by ADOL&WD to the 2020 forecast by ADOL&WD used as the basis for the SG PEL travel model socio-economic projections. Compared to previous studies readers should expect very different future transport system performance findings given the dramatically lower population forecasts since system utilization is highly correlated with population. Note especially the relatively flat population growth in Anchorage

2. Observations contrary to the justification for a 92nd Avenue Freeway Interchange - based on our participation in Technical Advisory Committee (TAC) meetings and reviews of available documentation:
 - a. ADOTPF's "non-motorized alternatives" (presented to the TAC on November 3) do not appear practical as they were misaligned, causing out-of-route travel. Additionally, the exorbitant price does not seem justifiable, particularly when considering the alternative of a non-motorized underpass. ADOTPF built a non-motorized underpass for Eagle River Loop Road for approximately \$2.3 million.

- b. ADOTPF presented incomplete language from land use plans to justify a full interchange as being consistent with existing land use and transportation plans. For example, while 92nd Avenue is a future transit corridor in the 2040 Land Use Plan, it is the lowest ranked of eight corridors and the rest of 92nd Avenue has not been built and is not a priority.
- c. No supportive traffic data has been presented.
- d. Specific safety concerns regarding the current ADOTPF design have not been addressed. The current design has an unprotected bike lane and a curbside pathway on Brayton where there is 50 mph plus traffic. Additionally, there is a cross-merging pattern where southbound on-ramp cars must weave through O'Malley off-ramp cars.