

Correspondence



RABBIT CREEK COMMUNITY COUNCIL (RCCC)

A Forum for Respectful Communication & Community Relations



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

Ryan Anderson, Commissioner
Alaska Department of Transportation & Public Facilities

September 3, 2023

Re: Alaska 2024-2027 Statewide Transportation Improvement Program

Members of Rabbit Creek Community Council (RCCC) have reviewed the public comment draft of the Alaska 2024-2027 Statewide Transportation Program (STIP) and the RCCC Board has approved the following comments.

1. RCCC supports the Anchorage Assembly's Resolution No. 2023-284 regarding the draft STIP, which the Assembly passed unanimously on August 22, 2023.
2. Specifically, RCCC would like to amplify the findings of the Assembly as follows:
 - a. Section 1 of AR 2023-284: RCCC has been on record for several years in opposition to STIP Project ID #30691, the Seward Highway, O'Malley to Dimond Reconstruction as proposed. That freeway project is a posterchild for misguided spending that goes against Anchorage's goals for safety and reduced dependency on vehicular travel. The proposed freeway expansion is no longer justified by population growth or travel demand; the on/off ramp at 92nd Avenue would channel high-speed traffic through low-income neighborhoods; and would not deliver safe and appealing non-motorized travel options. Moreover, at a total cost of \$179 million, it would commandeer funding away from beneficial urban projects.
 - b. In lieu of Project #30691, RCCC recommends the STIP include a design study for a non-motorized underpass of the Seward Highway at 92nd Avenue, and a separated bike and pedestrian lane within the Brayton Drive corridor. Non-motorized safety is a serious need in this corridor. Non-motorized facilities can and should be built without a vehicular interchange at 92nd Avenue, for greatest safety and cost-efficiency.
 - c. Section 2 and Section 8 of AR 2023-284: RCCC concurs with the need for greater accountability to ensure that Alaska Department of Transportation & Public Facilities (ADOTPF) projects match Anchorage priorities. RCCC echoes the Assembly's call that all ADOTPF should publicize the scoring process for all projects in Anchorage—those funded and those not funded. ADOTPF should share the scoring criteria and final scores for this STIP. Future scoring criteria should be presented for public comment. There should also be transparent accounting for Congestion Mitigation and Air Quality (CMAQ) funds, to ensure the Assembly's intention in A.R. 2023-284 that these funds are committed to mode-shift projects that reduce vehicle miles traveled.
 - d. Section 6 of AR 2023-284. RCCC has consistently advocated for right-sizing projects, in the strong interest of safety, cost efficiency, and neighborhood

quality. RCCC concurs that all ADOTPF projects within Anchorage beyond pavement preservation should include traffic studies and speed studies to ensure that roadway projects match Anchorage's adopted priorities and do not induce more traffic or degrade neighborhoods.

3. STIP Project #33862 for the AMATs Carbon Reduction Program appears underfunded at the proposed average level of under \$4 million per year. AMATS has not yet developed a measuring, monitoring, or reduction program for Greenhouse Gas (GHG) Emissions, even though transportation emissions account for 53 percent of the Municipality's GHG output. Robust funding is critical to help Anchorage meet its adopted Climate Action Plan that calls for a 50 percent reduction by 2030, from 2008 GHG emission levels. Cancellation of one unneeded mega project—like #36091 at \$179 million—would free funding for carbon reduction planning and other Municipal transportation priorities.
4. STIP Project #34164, Seward Highway Reconstruction MP 98.5 to 118, appears to have insufficient funding in the 2023-2030 timeframe: \$515 million is budgeted, compared to the cost estimates of \$850 million to over \$1 billion presented to the Safer Seward Highway Stakeholder Group and documented on the [Safer Seward Highway](#) web page.
5. Lack of transparency in the STIP. RCCC requests that future reviews of the STIP or other major funding documents provide summaries and analysis for the public.

In general, this draft STIP is not presented in a format that invites informed, meaningful public comment particularly if one is not already familiar with the context of a STIP project.

- This draft STIP does not present sufficient project details to indicate why any particular project is a high priority, e.g., whether it is for safety, freight hauling, tourism, etc. There are no project scores, nor is the necessity, scope, cost-efficiency, or potential impacts explained for an individual project.
- A summary or overview of ADOTPF spending is lacking. The public should be able to compare spending in various geographic areas, spending per capita, spending to underserved groups, and spending by mode of travel.
- Data to compare changes in funding over time is lacking. Some programs are flat-lined, some have intermittent annual funding.
- Information is not available on the adequacy of maintenance funding for current ADOTPF roadways and other facilities. Nor is there information on the future maintenance costs for each project.
- The STIP offers no explanation or rationale as to why some projects have been deferred for several years and brand-new projects have leapfrogged toward imminent construction. Unless one is already familiar with the context of a STIP project, the STIP does not facilitate informed public comments to ADOTPF.
- Missing in the STIP project analysis, but needed, is the impact on GHG Emissions and vehicle miles traveled.

Two specific examples of inadequate information for meaningful public comment follow:

STIP Project #34202, Pavement and Bridge Preservation funding holds flat from 2023 through

2030. There is no inflation proofing and no incremental increase to cover the many new road miles ADOTPF is constructing. The public impression is that maintenance funding is currently not keeping up with needs (e.g., the Alaska Marine Highway has been plagued by maintenance issues. ADOTPF standards for the percent of pavement in good repair are only 20 percent for “Interstate” highways, and 15 percent for non-Interstate highways, according to ADOTPF’s Transportation Asset Management Program (December 2022). Should the public want a higher level of maintenance, there is not enough information to comment constructively.

STIP Project #33860, Resiliency Program, ought to be of high interest to all Alaskans, but there is too little detail in the STIP for the public to understand what the Resiliency Program pays for, or why funding levels fluctuate between \$1 million and \$23 million per year. Does this program fund unanticipated repairs from natural processes and climate change, such as the boulders and ice falling on the Seward Highway along Turnagain Arm, or eroded riprap from wave action in Cordova, or frost heaves from melting permafrost in western or northern Alaska? If so, this Resiliency Program ought to have far greater funding than \$1 million in many years. But there is not enough specific or summary data for meaningful public feedback.

The RCCC has focused our comments on projects and policies with which our Council is familiar. We do not have the background to comment on the overall balance or priorities of the STIP. Thank you for your attention to our concerns.

Sincerely,



Ann Rappoport, Co-chair



John Riley, Co-chair

cc: Aaron Jongenelen, AMATS
Randy Sulte, Anchorage Assembly
Zac Johnson, Anchorage Assembly
Daniel Volland, Anchorage Assembly