

Correspondence



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



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

October 9, 2023

TO: 2050_mtp@PublicInput.com

Re: Comments on August 2023 draft of the 2050 Metropolitan Transportation Plan

We appreciate the opportunity to comment on the draft 2050 Metropolitan Transportation Plan (MTP). Rabbit Creek Community Council (RCCC) reviewed the 2050 MTP through its Land Use and Transportation Committee. At a monthly general meeting on September 14, 2023, RCCC voted to send the following comments by a vote of 14 yeas to 5 nays, with 3 abstentions.

RCCC welcomes the improvements we see in many of the Goals and Objectives of the Draft MTP, including the acknowledgement for needing to integrate land use and transportation planning. RCCC encourages further collaboration among Anchorage Metropolitan Area Transportation Solutions (AMATS), municipal transportation planners, and municipal land use planners to support compact land use. We would further encourage these experts to pursue alternatives to driving, in conjunction with targeted infill and redevelopment locations, particularly within denser development areas within the Anchorage Bowl. In our area, active transportation options are especially limited; RCCC has no existing pedestrian network, and only a couple of proclaimed bicycle “facilities” along the shoulders of unsafe roads, as confirmed in 2050 MTP maps.

Please see the Attachment for our detailed comments on the draft 2050 MTP goals and policy statements, and specific projects in the project lists. We have also recommended including several additional projects in our area. These are projects we have previously submitted, and will continue to submit, in one form or another to the Municipality’s Capital Improvement Program, Alaska State Legislature’s CAPSIS project list, and other planning opportunities.

Thank you for your attention to our comments and recommendations. We would be happy to discuss these with you.

Sincerely,

Ann Rappoport, Co-chair

John Riley, Co-chair

cc: Chelsea Ward-Waller, AMATS Metropolitan Transportation Plan 2050 Project Manager
Van Le, R&M Consultants Project Manager
Aaron Jongenelen, AMATS Director

ATTACHMENT

Our comments are organized into a section of 'General Comments' covering data and policy statements in the 2050 Metropolitan Transportation Plan (MTP), followed by comments on the recommended project list. We have also recommended several additions to the project list that are within the Rabbit Creek Community Council (RCCC) area.

General comments

This draft 2050 MTP shows a welcome shift in many of the Goals and Objectives. It also acknowledges the need to integrate land use and transportation planning. RCCC encourages further collaboration among Anchorage Metropolitan Area Transportation Solutions (AMATS), municipal transportation planners, and municipal land use planners to support compact land use. We would further encourage these experts to pursue alternatives to driving in conjunction with targeted infill and redevelopment locations within the Anchorage Bowl.

Data and policy statements in the MTP

- A. Goals and objectives (pages 15-17). RCCC is pleased to see that these goals incorporate many of our Council's perennial priorities: an emphasis on safety and alternative modes of transportation, avoiding induced traffic demand, and minimizing traffic impacts to neighborhoods and the natural setting. We have two comments:
 1. Include the concept of design to minimize conflicts and crashes. Design is an effective and self-enforcing way to ensure safe travel behavior, including safe speeds, driver attentiveness, and use of safe crossing points.
 - a. Safety, Objective 2C. Use facility design to minimize conflicts between different modes of travel, reduce unsafe behaviors, and increase attentiveness and awareness.
 2. Include the concept of safe speeds within the Safety Goal. Speed is the main factor in how badly someone gets hurt in a crash.
 - a. Add an objective 2D: Design for safe speeds, especially in residential and high density urban areas, in order to minimize crashes and the severity of impacts.
- B. The Equity Analysis map (Figure 6, page 21) appears to have several anomalies. If equity is based on income, race, other demographics, and health factors, then it seems unlikely that Far North Bicentennial Park/Basher area and Connors Bog should be rated for moderate need, when they have few or no underprivileged residents. Rating the strip of pricey residential land along the West Dimond Bluff as high need seems highly unlikely if based on economic demographics.

While generally supporting the equity analysis, we believe the plan would be improved by also considering an equity overlay for schools, because most school children are non-drivers. Safe walking and biking to school should be a city-wide priority reflected on the maps of this MTP as well as in the text, in coordination with the Municipality's Safe Routes to Schools manual.

Consider traffic volumes as an equity factor. While RCCC is generally a low density area, we have several high-volume traffic corridors such as Rabbit Creek Road that are increasingly unsafe as new subdivisions increase traffic there.

- C. Integrating land use and transportation investments. Thank you for citing the 2040 Land Use Plan. There is great potential for MTP transportation planners to collaborate with Municipal land use planners and the Assembly to direct transportation investments to support infill and redevelopment in specific neighborhoods, centers and corridors targeted for growth and change, per Land Use Plan Policies 6-7 and 6-8. We recommend including the objective of walkable neighborhoods in this MTP.
1. Create a new objective to prioritize transportation that catalyzes infill and redevelopment in locations identified in Land Use plans, either under Goal 4, Support the Economy, or Goal 5, Promote a Healthy Environment.
 2. Modify Objective 5E (page 17) to read: Promote healthy lifestyles and a healthy environment by connecting everyday destinations through increased active transportation, and by designing for 15-minute walkable neighborhoods.
 3. Add the following performance measures for promoting infill and redevelopment, and walkable neighborhoods:
 - a. Percentage of roadway funding and percentage of non-motorized funding that supports targeted infill and redevelopment.
 - b. Percentage of residents in 15-minute walkable neighborhoods.
- D. Page 22, Land Use. The current statement on page 22 is vague, and this MTP does not define “diverse forms of land use.” We suggest revising the statement regarding land use to read:
1. ~~By facilitating efficient forms of transportation, AMATS can help support conditions for more diverse forms of land use and affordable alternatives to driving, AMATS can help~~ reduce transportation costs, support targeted infill, and support the livability, affordability, and diversity of neighborhoods.
- E. The draft MTP notes that “the public wanted to be able to see performance measures and targets” to ensure that the investments of the MTP project list are meeting the adopted goals. We support the MTP statement on page 77 that “Performance measures should be based on actual data and have targets for a set time.” However, the performance measures in Table 24 (pages 78-79) are insufficient. The implementation strategies in Tables 25 and 26 lack both actual data and a set time.
- F. Revise Table 24 to specifically address the number of Deaths and serious injuries.
1. The MTP 2050 should set more ambitious reduction targets for fatalities and serious injuries than the Federal Highway Administration targets, which show very slow reductions. This does not seem to comport with the federal goal 23 USC 150(b) of significant reduction in traffic fatalities and serious injuries cited on page 2.
 2. Items 2A-2 and 2A-4 should include a conversion of the death and injury rate to the actual deaths and injuries in the Municipality, so that the public understands the human toll: for example, 1.3 deaths per million vehicle miles traveled will equal **XX** deaths in 2022.
 3. The MTP 2050 should set continuous, long-term targets for the reductions of fatalities and serious injuries, not just one year at a time as DOTPF and FHWA apparently do. One-year safety targets fail to exert due scoring influence on the funding of long-term projects.

G. Revise Table 25, MTP Implementation Strategies with corresponding related goals. RCCC is pleased that the MTP has outlined the process for developing local performance measures: thank you! The MTP should further commit to expeditiously completing that important task with these recommendations:

1. Include a timeframe and completion date for setting targets for new local performance measures.
2. Include the commitment of AMATS staff time to the effort of developing new local performance measures.
3. Include a more definitive commitment to reducing vehicle miles traveled and to reducing Greenhouse Gas Emissions (GGE) by adding the following language: Anchorage transportation currently emits 53% of the local GGE output, so transportation policy is instrumental in achieving meaningful GGE reductions. By 2024, AMATS will set annual and long-term targets for reducing GGE. The targets will be synchronized with the targets set by the Anchorage Climate Action Plan (a 50 percent reduction in GGE from baseline levels by 2030 and 80 percent by 2050). By 2025, AMATS will adopt modeling and monitoring practices for quantitatively tracking future and current GGE.

H. RCCC would specifically like to see more robust performance measures and targets for:

1. Walkable routes to schools. Walkable schools are a bellwether for safety, equity, reducing congestion at peak hours, and enabling rising generations to reduce their vehicle dependency. Safe routes to schools will require Anchorage School District participation, but AMATS is a key player in investing in safe routes. We are particularly concerned with this issue as the one elementary school in our RCCC area, Bear Valley, is one of only two schools in the District with zero walkable routes.
2. Roads and trails in good repair. AMATS could adopt standards that exceed the 10 to 20 percent good repair standards of FHWA.
3. Vehicle Miles Traveled. Set a reduction target for total Vehicle Miles Traveled, as well as a reduction target per capital. Reduced Vehicle Miles Traveled is a key metric for safety, public health, reduced GGE, and more efficient land use. With fewer vehicle miles traveled, there will be reduced needs for lane miles and parking; and more walkable, livable urban centers.
4. Greenhouse gas emissions. Coordinate with, and base the performance targets for GGE on the Anchorage Climate Action Plan, which aims to reduce citywide emissions by 80 percent from base levels, by 2050.

Comments on the Recommended Project List

General comment from the summary tables:

Page 53, Table 17: We note that Complete Streets projects are a funding priority in the near term (68 before 2035; 29 from 2035-2050) and Non-Motorized Projects are mostly funded in the Long-term (32 before 2035, and 75 from 2035-2050). Earlier dates for more non-motorized projects will better allow the MTP to meet safety, health, equity, land use, and GGE reduction goals.

Table 20, Complete Streets Projects in RCCC area:

Page 54, TIP CS 3: RC Road Rehabilitation (Seward Hwy to Goldenview) \$33.5 M left turn accommodations where possible and separated non-motorized path.

RCCC supports the high priority for this project. This section of Rabbit Creek Road is a high-volume, high-speed collector that has substandard sightlines, many turning movements, and an unfortunate crash record. Rabbit Creek Road is a key ingress-egress route in case of wildfire or other disasters on the Hillside.

Page 54, TIP CS 6 Mountain Air Drive \$15 M Extend to Sandpiper and recommend separated pathway.

RCCC supports the high priority for this project. Mountain Air Drive provides critical secondary ingress-egress for current, recently platted, and future subdivisions. It will also facilitate non-motorized access among neighborhoods and to Bear Valley Elementary School.

Page 58, TIP NHS 3: RCCC is participating in the Stakeholders Working Group (SWG) for the Safer Seward Highway Project that extends from Bird Flats to Rabbit Creek. The discussions of the SWG have emphasized safety, and on recognizing this project as a corridor with many uses and values; it is not just a roadway. Therefore, the project description should be amended as follows:

TIP NHS 3. Seward Highway Mile Post 95.1 to 118 Bird Flats to Rabbit Creek. ~~better accommodate traffic flow and address safety concerns~~
Align and design the highway corridor to increase safety; improve reliability of traffic flow; provide a non-motorized pathway; ensure safe local and recreational access; preserve recreation, scenic, and natural resource values; and include opportunities for alternative transportation.

Projects to add to the 2050 MTP in RCCC area:

RCCC is aware that projects not listed in the 2050 MTP have almost no chance of getting built with AMATS or State funding. Over the past many years, we have identified and brainstormed options for several projects not included in the 2050 MTP that are critical to the safety and connectivity of our Council area. We have submitted, and will continue to submit, these in one form or another to the Municipality's Capital Improvement Program, Alaska State Legislature's CAPSIS project list, and other planning opportunities. We respectfully request these now be added to the MTP. The need for these primarily Active Transportation projects is affirmed in the 2050 MTP maps. These document that RCCC has no existing pedestrian network, and only a couple of proclaimed bicycle "facilities" along the shoulders of unsafe roads (Figures 1.1 and 1.3, pages 26 and 27).

- A. Old Seward Highway recreational corridor from Rabbit Creek Road to Potter Valley Road add as a Short-Term project before 2035. This stretch of Old Seward Highway has poor sightlines, steep embankments, and no shoulders although it is heavily used by non-motorists. Low-lying areas flood periodically and the crumbling pavement must be resurfaced every few years. Vehicles must share the lanes with walkers, cyclists, wildlife viewers, and roller skiers. This area is evolving into a recreation hub, with the pending creation of a new parking pullout, connections to the Turnagain Arm Trail, and a large new municipal park and watershed conservation area. RCCC requests that this stretch of Old Seward Highway be designed as a low-speed recreation corridor, including appropriate signage.

- B. Golden View Drive separated pedestrian pathway from Rabbit Creek Road to Romania – A separated pathway is needed through a school zone and to connect several parks and trails.
- C. Elmore Road pedestrian bridge across Rabbit Creek – A pedestrian bridge will provide a safe, north-south commute option for South High students as well as cyclists commuting to town.
- D. Bainbridge Drive pathway connection to DeArmoun Road and 140th Ave – Currently the DeArmoun pathway ends at a blind stretch of road with no safe crossing or neighborhood connections. This is an important pathway for commuting and neighborhood connectivity.
- E. Schools on Trails connections on existing platted easements from Bear Valley School to Goldenview Middle School and Section 36 - Bear Valley Elementary School has zero safe walking or biking routes to school. Middle School students have almost no safe routes, either. RCCC has identified numerous possible connections along undeveloped easements and Rights-of-Ways.

Other Complete Streets projects of concern to RCCC:

Page 54, TIP CS 7: Academy Drive/Vanguard Drive to Abbott Road traffic circulation \$18.7 M. RCCC requests this project be delayed and re-designed to emphasize non-motorized connections. The adjoining neighborhoods need safer connectivity, but safety is best achieved without high speed through-traffic. Data show that vehicle capacity is not an issue.

Page 54, TIP CS 8: Safety Improvement Program - Collect traffic data \$17.6 M. RCCC supports data collection as the best basis for safe designs.

Pages 55 – 56, TIP Plans 2, 3, 4, 5, 7, 10; also, Page 59, CPS 037 for A & C Complete Streets: RCCC supports Plans for Complete Street studies and Corridor studies of our main urban arterials. These studies support safety, livability, and efficient compact land use in Downtown and Midtown.

Page 56, TIP Plan 9: Non-Motorized Inventory and Mapping. RCCC strongly supports and has previously requested this mapping. The mapping and inventory should depict as many platted but undeveloped easements as practical.

Page 56, TIP Plan 11: AMATS Climate Action Plan. RCCC supports this project, and is on record in support of developing targets, modeling, and monitoring of Greenhouse Gas Emissions from transportation.

Page 57, TIP NHS 1: Seward Highway O'Malley Road to Dimond reconstruction \$105 M . RCCC continues to ask that this project be deleted. Traffic data shows that this expensive freeway expansion is not needed. In addition, the added lanes and high-speed traffic pose safety risks and adverse health and land use impacts to low income neighborhoods. Re-design this project with a non-motorized crossing on the 92nd Avenue alignment and a separated pathway along Brayton.

Page 58, CIP 5: Canyon Road Improvements to CSP upgrade and include a parking lot for trail users.

RCCC supports this project. The existing road is unsafe and creates dust harmful to residents, recreationists, and overall air quality. There will be considerable public health, tourism, and thus economic benefits with this project.

Page 59, CPS142, CPS006, CPS008: Muldoon Road, 15th Ave, rehabilitations to reduce vehicle speeds and make safer for pedestrians and bikes.

These projects are currently scheduled for the long term. They are good examples of projects that promote safety and equity for underprivileged neighborhoods and can encourage needed infill in areas zoned for higher density.

Additional comments about projects included in the 2050 MTP:

RCCC supports synchronization of road projects and intersection projects so that increased traffic does not create a bottleneck or safety hazard. Several projects have a road extension in the short term and an intersection in the long term. It would seem more efficient and economical to combine these projects into one. Two specific examples follow.

Page 54, TIP CS 6 Mountain Air Drive should include an intersection project at the Rabbit Creek Road Intersection.

Page 59, CIP 7, Northwood Extension to Dimond at Victor needs to be synchronized with CPS 075, the future intersection project which is currently scheduled for after 2035.

Page 61, CPS096, Glenn Highway Management Study should be in the short term not long term given the large daily traffic use and opportunities to reduce GGE and congestion sooner, rather than later, through study findings.

Page 63, TIP Plans 8: AMATS Recreational Trails Plan Update. RCCC looks forward to participating in this planning process. It is important to our area that this plan includes use of platted easements that can provide safe, direct, off-the-roadway connections for non-motorized users.

Page 69, NMO 306 Railroad: Non-Motorized pathway and crossing study.

This study is focused on potential non-motorized use of the Railroad corridor in the Spenard area. Rabbit Creek Community Council requests expansion of this study to include potential pathway alignment along the railroad in South Anchorage. Our Community Council members must use on-the-road routes for north-south bike commuting (Brayton Drive or Ocean View subdivision roads, for examples). Mingling with vehicle traffic is not safe for many potential bike commuters.

Increase transit services

RCCC supports increased transit service as an investment in equity and an important step toward more compact land use instead of more road lanes and parking. RCCC specifically supports these transit projects (page 72):

TRN100 30-minute Transit Frequencies, as funding is available.

TRN102 Increase weekend span of service to add a couple of evening hours \$1M.

TRN103 Restore holiday service on 5 holidays (MLK Jr, President's Day, Seward's Day, Veterans' Day, and Day after Thanksgiving \$700K.

TRN104 New Route Independence Park to Dimond Transit center with Muldoon and Debarr Transit hubs, shopping center at C and 100th (Target store), and Alaska Native Medical Center \$4.1M.

Commuter rail should be addressed

Passenger rail would be an efficient future transportation mode that would meet many of the MTP's goals for equity, safety, sustainability, and efficient land use. RCCC requests that a commuter rail study be added to the MTP project list.