



## Rabbit Creek Community Council

1057 West Fireweed Lane, Suite 100, Anchorage AK 99503



June 10, 2017

Municipality of Anchorage AMATS  
Craig Lyon, Director  
Vivian Underwood, Senior Planner  
632 W 6<sup>th</sup> Avenue  
Anchorage AK 99501

Re: Comments on MTP 2040 Draft Screening Criteria and Public Comment Process

Dear Craig and Vivian:

At the June 8 meeting, Rabbit Creek Community Council (RCCC) voted to forward the following comments on the Metropolitan Transportation Plan (MTP) 2040:

1. RCCC requests written clarification of the draft screening criteria, extension of public comment period and postponement of Technical Advisory Committee's vote for final approval.

RCCC's concern is that the public process created to evaluate goals, objectives, and screening criteria may be perceived as irrelevant if the public is not allowed reasonable time for objective, persuasive input.

2. Certain draft screening criteria posted on the municipality website appear too ambiguous for the public to analyze objectively.

For example, the impact of "Operational Improvements" seems open to numerous debatable interpretations if the public is provided no clarification on what the term means to municipal policymakers.

In a rather counterintuitive response, the AMATS "Public Involvement Coordinator" indicated correspondence clarifying screening criteria is unavailable to the public.

3. Public-comment-period schedule does not provide reasonable time for public comment.

June 8 Technical Advisory Committee voted to approve screening criteria preliminarily  
June 10 Public comments are due at 5 pm  
*June 11 (Sunday, non-work day)*  
June 12 TAC votes on final approval of screening criteria

RCCC's concern is that, from the public's perspective:

- (a) TAC will see all public comments, evaluate them, and vote on final screening criteria, all on the same day, June 12, which suggests a decision made in advance to allow no opportunity for staff analysis or discussion of particularly relevant public input *before TAC's final vote on the basic building blocks of a 20-year plan*; and

(b) an unnecessarily abbreviated comment schedule relegates, and sets precedent for relegating, public comment to an irrelevant *pro forma* exercise, what may be reasonably perceived as a waste of citizens' time.

4. While approved criteria may not appear as final screening criteria, the AMATS Senior Planner indicated criteria, as approved on June 12, will be applied near-term to evaluate proposed transportation projects, *effectively shaping the remainder of the draft MTP*.

RCCC's concern is that, from the public's perspective, *public comment at this stage is essential* to refining and revising screening criteria.

5. RCCC requests additional opportunity for comment on AMATS goals and objectives.

RCCC's concern is that significant elements of the Comprehensive Plan are not represented in AMATS goals and objectives.

For example, parking significantly impacts land use and transportation.

According to "Anchorage Bowl Comprehensive Plan 2020", Policy 30: "Transportation and land-use programs *shall* (emphasis added) include: ... e) optimal use of parking".

However, AMATS goals, objectives, and draft screening criteria, are silent on parking.

6. RCCC requests the opportunity to submit specific comments when specific screening criteria are provided.

RCCC's concern is that unavailability of clarified screening criteria arbitrarily limits specific comments to the following:

a. The term "Operational Improvements" is too vague for focused comment or conflict resolution. A reasonable observer might conclude that, outside AMATS offices, the term may be construed to mean anything: fewer crashes, higher vehicle speeds, more stoplights, or any other quantifiable factor(s). For example, AMATS may favor higher traffic speed while a neighborhood may favor more intersections and traffic calming. In other words, the public has a clearly vested interest in having a voice on specific factors that constitute "Operational Improvements".

b. The concept of "impacts bicycle route/trail use" requires clarification. For example, road projects may include safer bike lanes, but inadvertently create hazardous intersections. Officially listed bicycle and trail use rating factors will facilitate productive public input.

c. The term "Sidewalk use" requires clarification to include crosswalks and other designated safe crossings.

d. The term "community impacts" is well-defined in the footnote. This level of definition allows the public to offer relevant comments.

e. RCCC supports the definition of community impacts as "neighborhood livability (the quality of the local environment as experienced by people who live, work or visit

there) as a consequence of changes in noise, views, walking environment, land use mix and community cohesion (the quality of interactions among neighbors). "

f. RCCC requests that "Air Quality" be included in these rankings in accordance with "Anchorage Bowl Comprehensive Plan 2020", Policy 30: "Transportation and land-use programs *shall* (emphasis added) include: ...f) minimization of individual and cumulative air quality impacts."

g. The scoring category "level of consistency with other adopted plans or studies" apparently does not allow for scoring with negative "points".

RCCC's concern is the risk of inaccurately scoring project proposals which are inconsistent with adopted plans.

h. The term "economic benefits" appears to omit long-term net economic benefits.

RCCC requests large-scale projects include a long-term cost-benefit analysis of potential citywide impacts including, for example, loss of taxable land, diminished property values, loss of wetlands, increased traffic volume, etc. versus potential benefits such as increased freight-movement capacity, potential accident reduction, etc.

i. Parking is a significant land use created by a road-focused transportation plan.

RCCC requests induced-parking demands be specified and added to the rating system.

RCCC suggests reviewing other municipalities' processes for evaluating changes in parking requirements, with the possibility of including parking either in the economic cost-benefit category, or in the land-use plan-consistency category.

j. The term "Deliverability" is too vague for focused comment.

RCCC's concern is that "Deliverability" may overlap with "community impacts" and "economic benefits" categories.

RCCC requests clarification of the term "financial impacts" to include who or what may be impacted.

Thank you for the opportunity to comment.

Again, it is respectfully requested that the AMATS public-involvement process allow TAC and staff to evaluate and include public comments before proceeding to the next stage of the plan.

Sincerely,

*Adam S. Lees*

Adam Lees, Chair

cc: Suzanne LaFrance, Anchorage Assembly  
John Weddleton, Anchorage Assembly