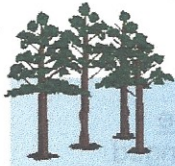


Correspondence



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



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

Aaron Jongelenen, AMATS Director
Christine Schuette, AMATS Communications Coordinator

May 5, 2022

Dear Aaron and Christine -

Thank you for the opportunity to comment on the draft Transportation Improvement Program (TIP) for 2023-2026 produced by the Anchorage Metropolitan Area Solutions (AMATS). The Rabbit Creek Community Council (RCCC) reviewed and voted on the draft TIP at its April 14, 2022 meeting. The following comments were approved there by a vote of 15 yeas, 0 nays and 0 abstentions. We have organized our comments by identified sections in the TIP.

Draft TIP narrative

Page 2, para 2 of Introduction: the link for the AMATS Boundary map is broken.

Page 4, Section 2.3 Consistency with Other Plans

Compliance of the draft TIP with other adopted plans is not adequate. The draft narrative claims that, "the projects included in the TIP are consistent to the maximum extent possible with other adopted local, State, and AMATS plans." If this statement is true, then Section 2.3 should:

1. Reference, and comply with the Anchorage Climate Action Plan. Specifically, Section 2.3 should cite the targets for reduction of Greenhouse Gas Emissions (GHG), which includes a 50 percent reduction by 2030 (compared to 2008 levels). The Narrative should also state how the mix of projects funding in this TIP will reduce GHG, and what level of reductions will be achieved by the end-date of this TIP in 2026.
2. Reference, and comply with, the targets of Vision Zero for reduction of pedestrian and bicyclist deaths and injuries. The Alaska Department of Transportation and Public Facilities has a "fatalistic" approach of maintaining nearly the same rate of traffic deaths and serious injuries (up to 60 such incidents in 2021 and 58 in 2022, per Table 2.1). The state target should not overrule the locally adopted target.

Page 12, Section 2.8.1 Amendments and Section 2.8.2 Administrative Modifications

RCCC has previously noted that the AMATS process is not responsive to public input. Section 2.8 of the draft TIP prevents public input on significant changes to the TIP. If the cost of a project increases by 25 to 49 percent, that is a major, not a minor, modification. That magnitude of change in a mid-sized or large project is likely to affect other projects in the TIP. RCCC believes that project cost increases in the magnitude of 25 to 49% should trigger an amendment to the TIP and should require Assembly approval and a re-demonstration of fiscal constraint. Currently, the proposed TIP narrative on page 12, Section 2.8, specifically precludes Assembly approvals or public review unless a project cost increases by 50% or greater.

Likewise, Section 2.8.1 of the proposed narrative grants AMATS staff the right to approve funding increases for any project by up to 25 percent, and to leapfrog a project to the front of the funding line without either a TIP amendment or an administrative approval. It seems that

changing the order and increasing the funding for projects will inevitably lead to delays or downsizing for projects in the approved TIP. Therefore, this should not be a staff prerogative without approval by the Policy Committee and public notification.

Draft TIP Roadways – Table 2

RDY00005 Rabbit Creek Road Reconstruction – Seward Highway to Golden View Drive

For the past at least 5 years, RCCC has requested that this Project Description be changed. The Council advocates a design for left turn pockets, not a center turn lane. Center turn lanes are notoriously unsafe. RCCC also emphasizes the need for the project description to specify a separated non-motorized pathway for this road because of the high-speed, high-volume traffic.

RDY00010 Mountain Air Drive

The scope of this project should include a possible connection to Bear Valley. Fire suppression and emergency evacuation along the upper Hillside is a top concern for RCCC. Bear Valley, at the windward edge of the Anchorage Bowl, has only one egress/ingress road. Mountain Air Drive could and should provide secondary egress to Bear Valley for wildfire fighting and evacuation for wildfires or other disasters. This is a tremendous safety issue that could be improved with this short additional segment!

RDY00013 Academy/Vanguard Drive Area Traffic Circulation Improvements.

These projects cost \$18.7 million and are precipitated by an UNNEEDED interchange and underpass of the Seward Highway at 92nd/Scooter Drive. RCCC has repeatedly commented on why this project is no longer needed: the interchange was designed 20 years ago when Dimond Mall was the only big regional mall in town. Traffic patterns and counts for the Dimond Mall area no longer justify this interchange. The interchange is so close to the existing Dimond Boulevard interchange that the Federal Highway Administration (FHWA) must grant a waiver for this second interchange. This is a huge waste of public money and land; it impacts a low-income housing area; and it will induce cut-through traffic and over-all traffic demand. Again, do not fund this project, or the interchange at 92nd/Scooter Drive. Our city has many higher priorities!

Draft TIP Plans and Studies – Table 4

PLN000015 AMATS Street Typologies Plan

RCCC supports this plan and advocates public involvement to ensure a range of context-sensitive street typologies, including new typologies to better address community opportunities.

- Develop a new roadway and non-motorized corridor typology for a Greenway or a Recreation Corridor. RCCC recommends this sort of typology for the Old Seward Highway east of Potter Marsh adjoining the Coastal Wildlife Refuge, to improve safety and community benefits.
- Develop a typology that prioritizes safe access to schools.
- Develop a typology for non-motorized connections that can serve as emergency evacuation routes: for example, off-the-roadway trails that could function as a bypass or detour for vehicles in the case of an evacuation or other emergency.

PLN00018 AMATS Recreational Trails Plan Update

RCCC requests that this project be re-titled the Transportation and Recreation Trails Plan Update. The AMATS 021 Non-motorized Plan includes very few parts of the pedestrian trail network (only the main pedestrian corridors in Downtown and Midtown). There is a city-wide need for pedestrian and multi-use trail connections for commuting to work, school, and other neighborhoods. Including “transportation trails” in the title of this Plan will reduce prejudice against trail investment. Trails that are labeled recreational can sometimes be undervalued as a leisure-time investment, rather an investment in the transportation network. The proposed Trails

Plan update should include utilitarian trail connections throughout Anchorage—not just trails for recreation.

Non-Motorized facilities - Table 3

NMO00012 Multi-use Pathway from Tudor Rd to No. Lights Blvd and West Tudor Connection
RCCC supports the multi-use pathway along the railroad right-of-way from Tudor to Northern Lights. This offers a low-stress corridor for pedestrians and bicyclists, separated from high-volume traffic corridors. Low-stress corridors are lacking, but greatly needed, in Midtown.

PLN00019 - Nonmotorized Facilities Inventory and Mapping

This inventory should include not just existing facilities but existing easements and undeveloped right-of-way that are suitable for non-motorized connections. There are dormant easements all over town that could increase the efficiency and safety of the non-motorized network.

Congestion Mitigation Air Quality (CMAQ) - Table 5.

CMQ00013 and 00014 - Non-Motorized Facility Maintenance Equipment purchases and Winter Greenbelt Equipment purchases. RCCC supports these. They are much needed.

CMQ00017 - Capital Vehicles Fleet replacement. This project should include language to purchase Electric Vehicles (EV) and convert the fleet to EV on an expeditious schedule.

Magnesium Chloride for dust control along roads – how does this chemical affect water quality?

National Highway System - Table 8

NHS00004 Seward Highway O'Malley Road to Dimond Blvd Reconstruction Phase II

As described above, the underpass at Scooter Drive and 92nd is not needed; it would be a misuse of public funds. It is so close to the Dimond Boulevard Interchange that FHWA must issue a variance. The cost is \$105 million in the next 4 years and \$76.5 million more later: that \$181 million could be scaled down and spent for much more useful and needed roadways elsewhere in Anchorage, benefitting many more people. Additionally, this interchange will necessitate \$18 million in neighborhood road upgrades at Vanguard and Academy.

Seward Highway from MP 98.5 to MP 118 DeArmoun or Huffman – the design study is worded as: reconstruct it to a four-lane highway. Comment: the design should include options to determine the optimum configuration for optimum capacity and safety cost/benefits and not assume four lanes for this entire distance. If the project is likely to cost \$662 million, the design should look at the cost/benefits of different alternatives very seriously.

A better description of AK094 and AK105 Construction & Road Improvements at APU is needed. Is this a cover for the Bragaw extension?

Sincerely,



Ann Rappoport, Co-chair
Rabbit Creek Community Council

cc: Chris Constant and Meg Zaletel, AMATS Policy Committee
Suzanne LaFrance and Randy Sulte, Anchorage Assembly