

Correspondence



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



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

AMATS Policy Committee
Attn: Craig Lyon, AMATS Coordinator
632 W. 6th Ave.
Anchorage, AK 99501

Re: Public Comment Period on Goals and Objectives of MTP 2050

October 22, 2021

Dear AMATS Policy Committee:

The Rabbit Creek Community Council (RCCC) is writing to comment on the proposed public comment period for the Goals and Objectives of the draft Metropolitan Transportation Plan (MTP) 2050. Our community believes that the proposed 15-day comment period is woefully inadequate for a meaningful public process. Therefore, the RCCC requests AMATS to provide a 45-day public comment period for review of the MTP 2050. The RCCC also notes that 45 days should be the standard public comment period for AMATS, with 35 days as the minimum comment period.

During the MTP 2040 process, the RCCC and other organizations submitted specific and substantive written criticism to AMATS regarding the previous Goals and Objectives. This included goals for reducing Greenhouse Gas Emissions and vehicle dependency. The AMATS staff responded during the MTP 2040 process that the looming deadlines precluded any major changes; but that the MTP 2050 planning process would include open discussion of these overarching issues.

At the October 14, 2021 Technical Meeting, members of the RCCC learned that AMATS staff proposed limiting the public comment period for Goals and Objectives to 15 days. Staff said that they intend to adopt the same Goals and Objectives from the MTP 2040, so they did not see the need for a prolonged public review. Staff also said that public comment is heaviest at the end of the long-range planning cycle, not the beginning, so that also justifies a short 15-day review opportunity.

At its regular monthly meeting on October 14, 2021, the RCC placed the issue of the shortened public comment period on the agenda. Following a discussion, the RCCC voted to send the above request to AMATS staff and Policy Committee. The vote was 34 yeas, 0 nays, and 5 abstentions.

As a result of that discussion and vote, the RCCC submits the following findings:

1. *Government agencies have an obligation to provide meaningful opportunity to participate in and comment on their processes.*

In order to submit constructive comments, citizens need time to read and discuss the complexities of transportation issues.

Community Councils and other organizations generally meet monthly. They need to give public notice of their agendas. Even if they have special committees on transportation issues, council members need time to research, convene, and deliberate on the issues. Bylaws typically require any action by a committee to be approved by the Community Council as a whole.

It is disrespectful to imply that 15 days' review is adequate because "citizens don't want to focus on Goals and Objectives" (staff comment on October 14). To the contrary, most citizens understand that goals and objectives are the foundation for all good planning.

It is also disingenuous to suggest that the public gets "burned out" by long public comment periods. What makes the public "burned out" is when their comments are summarily and repeatedly deferred or dismissed with prejudice, or government takes action without any opportunity for input.

2. *Bias in the process to maintain status quo.*

It is troubling to hear that AMATS is shaping the planning process to make minimal changes in the MTP 2050. At its October 14 meeting, AMATS staff said the 2040 goals and objectives would be re-adopted with minimal revisions. AMATS also said the 2050 plan will use 2019 socio- and economic data, and disregard 2020 and 2021 data, because the COVID-19 pandemic reduced driving, and they want to assume the earlier trajectory for driving demand.

3. *Deferred concerns.*

In 2020 and early 2021, the AMATS staff deferred several large overarching issues of public concern, with the promise that the public concerns will be addressed in the MTP 2050 process. The time to address those issues is now, and it can only be done through a meaningful public process.

The Rabbit Creek Community Council hopes that other community councils and community groups will actively participate in the public comment period on a foundational element of the MTP 2050 – Goals and Objectives. Therefore, this comment period should be extended to 45 days. A short comment period exhibits disrespect for the public and implies an intention to diminish and devalue public comment.

Sincerely,



Ann Rappoport, Co-chair
Rabbit Creek Community Council



Carl Johnson, Co-chair
Rabbit Creek Community Council

cc: AMATS Community Advisory Committee, through Christine Schuette
Federation of Community Councils Chair