

Correspondence



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



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Comments on the **Metropolitan Transportation Plan 2050 Project Prioritization Criteria**

The Rabbit Creek Community Council (RCCC) has been involved in reviewing and commenting on Anchorage transportation project planning and implementation for many years. We are looking forward to making recommendations on transportation projects in the Anchorage Metropolitan Area Transportation Solutions (AMATS) area for the time horizon of now until 2050, and thus are very interested in ensuring that this current phase establishes Project Prioritization Criteria which are fair, reasonable, realistic, and will advance the Anchorage Climate Action Plan, including by prioritizing sustainability, and transit and active transportation alternatives.

We have submitted extensive comments on the first stage of the Metropolitan Transportation Plan (MTP) 2050 development: Goals and Objectives, December 22, 2021, letter to AMATS. Today we are also submitting comments on the MTP 2050 Performance Measures; this letter provides our input on the MTP 2050 Project Prioritization Criteria which were analyzed by our Land Use and Transportation Committee. We discussed the Criteria at the RCCC March 14, 2022, general membership meeting where the membership voted to submit comments on the following topics by a vote of 27 ayes, 1 nay, and no abstentions. Our four primary concerns are described below; specific comments are detailed in the Attachment.

Primary concerns - The Project Prioritization Criteria:

1. Lack any form of a test run. The public's ability to evaluate these ranking criteria is handicapped by lack of a test run. We presume that AMATS has done a test run on proposed projects; however, no outcomes have been made public. If a test has been run, that information should be made public and comments solicited. If not, a test should be run and the data made available so the public can learn and provide better comments. It is difficult for the public to give informed comments about this scoring system without seeing how different types of projects are prioritized.
2. Lack clarity about the relative weight for the criteria. It seems arbitrary that each of six very different categories is equally weighted for 20 points maximum. By their nature, each of the three types of projects may score particularly well or very poorly in one, but not another of these categories, and some accounting should recognize those

differences. The proposed artificial “balance” does not reflect any community priorities of which we are aware. The maximum points for each category should be revised to better reflect community values with the most important criteria having more points. Additionally, we recommend making the total allowable points equal 100 so that relative scores are more intuitive.

3. Under-value land use goals from adopted plans. Our adopted land use plans should be a major “driver” of where we invest our transportation spending. The scoring system should look first at our adopted plans to determine where more access is needed for residential, commercial, or visitor development patterns.
 - Land use goals should be a “screening factor” for public funding of any transportation project.
 - Land use goals should account for a much greater percent of the project scoring. Currently, land use is given only 5 points out of 120.
4. Under-value sustainability: particularly greenhouse gas (GHG) emissions and vehicle miles traveled. This draft scoring system allows a maximum of 5 points (out of 120) on the basis of GHG emission reductions. This meager scoring will fail to implement the Anchorage Climate Action Plan. That plan commits Anchorage to reduce GHG emissions 80% by 2050. Our transportation system currently spews out 52% of our GHG emissions. Clearly, AMATS needs to prioritize transportation projects that can sharply reduce GHG reductions.

AMATS should do test runs of the scoring system to determine how to prioritize projects that will reduce GHG emissions to the levels called for by the ACAP. In order to meet this goal, a minimum of 1/3 of the total points should be awarded on the basis of GHG reductions.

Vehicle miles traveled (VMT) is sometimes offered as a proxy for GHG reductions. This scoring system provides only two direct points (out of 120) for reducing demand for single-occupancy vehicle travel. VMT reductions should receive higher points for other reasons: VMT is a proxy measure that correlates to urban sprawl, lack of convenient transit or active transportation, poor safety, environmental impacts, etc. Our adopted Municipal land use and transportation plans have called for reduced vehicle dependency since at least the 2002 publication of our 2020 Comprehensive Plan.

Thank you for your attention to our concerns.

Sincerely,



Ann Rappoport, Co-chair



Michelle Turner, Co-chair

Attachment

cc: John Weddleton, Anchorage Assembly
Aaron Jongenelen, Project Manager
Van Le, R&M Consultants, Project Manager

Suzanne LaFrance, Anchorage Assembly
Christine Schuette, Public Involvement
Taryn Oleson-Yelle, R&M Consultants,
Public Involvement Coordinator

Attachment

Specific Comments on Metropolitan Transportation Plan 2050 Prioritization Criteria

Under MTP Goal 1, Maintain existing infrastructure: no comments.

Under MTP Goal 2, under Safety:

- a. The scoring is based on collision locations. This means that someone has to get hurt before there is an investment in safety. This is a reactive approach, like ignoring health risks until there is a problem serious enough for the emergency room. Allow points for hazardous locations before major crashes (e.g., near misses).
- b. The scoring for “security” emphasizes street lights and emergency phones. It seems redundant with scoring for safety.
- c. Bicycle and pedestrian projects should be eligible to receive points for emergency response improvements where they can provide cut-through access or alternative access in case of a road closure. Eight-foot wide paths can accommodate vehicles in an emergency, so should be included as safety improvements. Such paths are being considered in Resilience/Firewise planning and mitigation efforts currently being undertaken by several Hillside community councils in coordination with Municipal and University disaster and fire prevention planning experts.
- d. Award points for projects that meet the new USDOT Roadway Safety Strategy that specifically focuses on road designs to minimize unsafe speeds and risky driving behavior.

Under MTP Goal 3, Improve mobility options:

- a. Award more points for projects that reduce single-occupancy vehicle travel (up to 6).
- b. Award more points for projects that reduce Vehicle Miles Traveled (VMT) per capita (up to 10).
- c. Provide up to 20 negative points for projects that cause induced vehicular travel demand (create more vehicle trips).
- d. The MTP should model 15-minute walkable neighborhoods. Award points for non-motorized connectivity in those boundaries (similar to the high number of geography-based points within Environmental Justice (EJ) Areas).

Under MTP Goal 4, Support the economy:

- Reduce the points for freight traffic where it does not mesh with adjoining land uses. Currently, there are high points for any project that has freight traffic or is in a major commercial area, regardless of how it might impact the intended land uses.
- Land use does not receive enough points: only 5 points maximum out of 120. Projects that are integral to the intended land use development pattern should earn at least 15 points under “economy.”
- There should be a disqualification option for proposed projects that cause significant negative impacts to the adopted land use plans and policies.

Under MTP Goal 5, Promote a healthy environment:

- Award points for projects that build 15-minute walkable neighborhoods.
- Don't limit air quality and GHG points to only areas that already have polluted air.
- Set specific thresholds for GHG points: more points to projects that reduce emissions, and negative points for projects that induce more driving and increase emissions.
- Protect natural areas: this scoring description is written to make it hard to earn any points. It is highly unlikely that any project will have a positive impact on sensitive natural areas. It should be restructured so that points are allotted for protection of natural areas (e.g., direction of stormwater for treatment or to mitigate erosion) or facilitation of access to natural areas (e.g., trails and trailheads).
- There should be a higher penalty for negative impacts to important natural features or land uses: - 15 points instead of -5. Anchorage is distinguished by its natural setting, and protecting the natural setting is important to the economy and public health.
- VMT is an important proxy and deserves more than 5 points.

Under MTP Goal 6, Advance Equity, provides mobility benefits to EJ populations:

- Referring only to mobility benefits is too vague. Score projects on whether they offer more affordable, more convenient, safer, healthier, and more time-efficient transportation to vulnerable populations. For example, a sidewalk next to an arterial through a low income neighborhood isn't safe, healthy, or time-efficient compared to a rapid-service bus or a city-bike type program.
- Instead of a negative 20 points for projects that heavily burden EJ areas, there should be a disqualification or "do not build" option.