

Correspondence



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



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

Permit & Development Center
Anchorage Metropolitan Area Transportation Solutions
P.O. Box 196650
Anchorage, AK 99519-6650
amatsinfo@anchorageak.gov

March 31, 2022

Comments on the **Metropolitan Transportation Plan 2050 Performance Measures**

The Rabbit Creek Community Council (RCCC) has been involved in reviewing and commenting on Anchorage transportation project planning and implementation for many years. Most recently we submitted extensive comments on the first stage of the Metropolitan Transportation Plan (MTP) 2050 development: Goals and Objectives, December 22, 2021, letter to Anchorage Metropolitan Area Transportation Solutions (AMATS). Our Land Use and Transportation Committee has now analyzed the draft MTP 2050 Performance Measures. For reference, we considered performance measurements from other cities, primarily Boulder, CO, and Minneapolis, MN (see links below and in the Attachment for these references). This analysis was discussed 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 Performance Measures should:

1. Measure the desired results, not just the tactics and tools. Many of the proposed draft performance measures look at efforts, not at outcomes. This is like setting an objective to earn an 'A' in class, and then measuring the amount of money spent on books. For example, draft Objective 6C proposes to measure equity by measuring how much of the public involvement budget is spent on outreach to disadvantaged groups. Given the lack of influence that public comment had on the 2040 MTP, public involvement spending will not help to make transportation more affordable, more convenient, or safer for the disadvantaged. This is measuring a tactic, not an outcome.
2. Document how greenhouse gas emissions (GHG) will be reduced. In Anchorage, transportation emissions currently account for 52% of our city's GHG output. The Anchorage Climate Action Plan commits to reducing Anchorage's GHG emissions 80% by 2050. We enthusiastically support where MTP objectives call for reducing greenhouse gas emissions in our transportation system (i.e., under Goal 5). **Yet, this draft MTP includes no measurement or monitoring for GHG emissions, making it impossible to know whether the emissions are being reduced, or whether we are on track to meet this commitment.** AMATS surely has a responsibility to implement the Anchorage Climate

Action Plan and can use the effective examples of other Metropolitan Transportation Organizations to measure and reduce GHG emissions (e.g., Boulder, CO, and Minneapolis, MN). It is critical to add GHG measuring, monitoring, and reduction to the MTP 2050 Performance Measures.

3. Reflect input from the public comment process. Over the last several years of MTP development, AMATS has overwhelmingly dismissed or deferred action on public comments as amply documented in AMATS publication of "Response to Comments." AMATS has not provided any public work sessions to help inform or actively involve the public: in short, there is no dialogue. AMATS is also ignoring or downplaying important local adopted plans which included significant public involvement, such as the Anchorage Climate Action Plan and many elements of the Comprehensive Plan. Real public involvement means responsible comments are publicly acknowledged and final documents reflect that influence, including how the document was modified to reflect public opinion or with an explanation of why it could not be changed.
4. Include a requirement for an annual report card. The public and municipal officials should be able to easily see measured progress or failures every year so that resources and efforts can be better targeted in subsequent years. Boulder CO has an example of a one-page, at-a-glance report card: [Boulder CO Measurable Objectives 2020 \(page 8\)](#)

We appreciate your attention to both these primary concerns and our comments on specific points in the draft Performance Measures as detailed in the Attachment. As noted above, we have been frustrated with the seeming lack of attention to public input on transportation planning over the years, whether it has been from community councils like ours, or other community members. Please help us understand how well researched public comments can be given greater weight in final planning guidance and documents for Anchorage transportation. We would be interested in meeting with your planners and leadership team to discuss this further, and would be happy to involve other community councils as well as our Assembly members.

Sincerely,



Ann Rappoport, Co-chair



Michelle Turner, Co-chair

Attachment

cc: John Weddleton, Anchorage Assembly
Suzanne LaFrance, Anchorage Assembly
Aaron Jongenelen, Project Manager
Christine Schuette, Public Involvement Coordinator
Van Le, R&M Consultants, Project Manager
Taryn Oleson-Yelle, R&M Consultants, Public Involvement Coordinator

Specific Comments on Metropolitan Transportation Plan 2050 Performance Measures

Goal 1: Maintain existing infrastructure

The Rabbit Creek Community Council (RCCC) has previously commented that maintenance of existing infrastructure should be prioritized ahead of new construction, [December 22, 2021 comments to Anchorage Metropolitan Area Transportation Solutions (AMATS)].

Add a new objective to gauge the percent of spending on maintenance over time versus the percent spent on new capital projects. This will guard against unsustainable expansion of infrastructure.

Objective 1A: Achieve a state of good repair for all modes.

Add an assessment 1A-11 for the pavement and bridge conditions of collector and local roads, and for bike and pedestrian facilities. The federal performance measures only assess highways. This is a glaring omission that can be corrected in our Anchorage plan.

Objective 1B: Increase transportation infrastructure resiliency to natural hazards.

The proposed objectives 1B-1 and 1B-2 (tallying new road miles in the 100-year flood or seismic zones) have nothing to do with resiliency – does this mean these new roads will be built to more resilient standards? Shouldn't the goal be to avoid building roads in high-risk flood or seismic areas? Additionally, very little of the AMATS area is within the 100-year floodplain.

Create new Objectives 1B-3, 1B-5, etc. for performance measures that minimize exposure to: *coastal flooding, heat, winds, icing, and winter freeze-thaw conditions*. These factors are all increasing with climate change and represent hazards and increased maintenance issues for transportation corridors.

Recommended new Objective 1B-3: **Measure the percentage of projects for which nature-based solutions reduces project maintenance by 50% or greater, compared to engineered solutions.** The current language encourages tokenism by measuring the percentage of projects that incorporate nature-based solutions without regard for the relative importance or effectiveness of those nature-based solutions.

Goal 2: Safety

Revise objectives 2C-3 through 2C-6 to measure injuries and deaths as a ratio of miles biked and walked, rather than as a total number. Crashes, injuries and deaths are important measures, but they are an incomplete record of safety. Injury rates might be artificially low or might drop where dangerous roads deter people from biking or walking or driving some routes.

Objectives 2C-1 and 2C-2 invite tokenism by tallying any safety or security feature on a project, without regard for the magnitude of its effectiveness. Could a single streetlight on a 65-mph highway earn pedestrian safety points, for example? Replace Objectives 2C-1 and 2C-2 by measuring specific, proven design features that minimize injury and increase comfort as well as safety. Both perceived and actual biking and walking safety can be measured as:

- Percent of roadways with speeds of 20 mph or higher that have separated pathways;
- Percent of students residing in safe Walk-to-School zones;

- Percent of residents with a 15-minute safe walking radius to parks, schools, and commercial centers; and
- Percent of crossings in community centers that meet standards for universal access and have enhancements for comfort and safety.

See Boulder CO Pedestrian Plan Guiding Principles from the 2019 Transportation Master Plan. [Boulder Pedestrian Design Principles and Low-Stress Walk and Bike Network](#)

Goal 3: Improve mobility options

This Goal is worded to “support an efficient, reliable, and connected transportation system that equitably improves access and mobility to all activities.” “All activities” cannot be defined or measured. The meaningful measure is whether people, and not activities, have equitable access and mobility.

Managing Travel Demand: The draft lacks targets for efficiency or for managing travel demand. We recommend adding three measures to address this deficiency:

- Add a new measure 3A-6: Set travel demand targets for non-vehicular travel. Minnesota has a Travel Demand Ordinance that includes regulations toward achieving the goal that three of every five trips taken in Minneapolis will be by walking, bicycling or transit (May 14, 2021).
- Add a new measure 3E-3 for land use efficiency: Measure travel time per capita, not just peak-hour delay per capita as required by FHWA. Compact land use involves shorter travel time than urban sprawl.
- Require the calculation of induced demand from projects that are programmed for funding (new objective under 3E-4). It is well-documented that adding lanes will induce further vehicular traffic in a cycle of worsening congestion (e.g., Houston’s infamous Katy freeway on I-10 which expanded to 26 lanes only to be quickly filled by vehicles).

Measure efficiency and equity with additional and clarified measures as follows:

- Measure the travel mode shift by measuring the ratio of trips by vehicular travel, transit, biking, and walking (new 3B-6).
- Measure the ratio of transit service hours and bike system miles to employment growth (see, Boulder, CO for example) (new 4B-3).
- Parity of travel options: Clarify 3G-5. Be more specific: compare commute time by bike, bus, and car on key corridors to ensure that there are competitive options.
- Measure transit parity: miles of bus-only lanes or transit-advantaged corridors (e.g., as done by Minneapolis) (new 3B-6).
- Measure accessibility: the percent of destinations that can be accessed by transit (new 3B-7).
- Measure efficiency of land use: percent of population living in a 15-minute walkable neighborhood (new 3E4) (based on Boulder, CO)

Further measures for travel demand management

Objectives 3A and 3E, to support land use goals and reduce congestion, need specific performance measures and not just the references to 3A, 3B, and 3D. Don’t measure the tools, measure the outcomes. Add measures to 3E to reduce peak-hour demand and to make more efficient use of existing lanes before adding lanes or intersections.

Goal 4. Support the Economy

Tourism

- Add new measures for tourism-friendly enhancements under Objective 4B.
- Add performance measures for aesthetics, wayfinding, or connections to tourism destinations.
- Replace objective 4B-1 which would track annual tourism spending, with a new 4B-1, 'length of visitor stay in Anchorage.' There is not a powerful causal relation between transportation investments and tourism spending, so AMATS cannot take credit or blame. Length of visitor stay in Anchorage better correlates with tourists' level of use of the local transportation system.

Attracting an active workforce

Under Objective 4B, add a measure for the ratio of transit service hours and bike system miles to employment growth (e.g., see Boulder, CO).

Adaptability

Regarding the objective of Adaptability, 4C: Adaptability is achieved when people have multiple convenient options, as suggested in 3G under adaptability. Therefore, add measurement and comparison of:

- auto travel times (4C-1);
- transit travel times (4C-2); and
- bike travel times (4C-3).

Delete the cross-references to 3B-3 and 3A-5, which are tokens in counting the percentage of projects that have non-motorized elements or new technologies rather than documenting real measures of adaptability.

Goal 5: Promote a healthy environment

Protecting the natural setting and open spaces

The National Environmental Policy Act (NEPA) is not a proxy for local environmental goals. Connection to the natural setting is one of Anchorage's best assets, providing competitive advantages over other metropolitan areas. Preservation of this asset should be a high priority for AMATS and be reflected in MTP 2050.

RCCC has previously commented (December 2021) that the environmental objectives of MTP 2050 are diminished from MTP 2040, which sought to reduce impacts to specific natural resources. The MTP 2050 should aim to reduce such impacts by restoring this specificity to Objective 5D, as well as by measuring:

- Acres of wetlands impacted; and
- Acres of open space or park land impacted by noise, air pollution, and hydrological disruptions; and areas where wildlife movements are inhibited or blocked.

Protecting neighborhoods

Air quality has highly-localized impacts. Anchorage's own municipal health studies have

documented pockets of low air quality and elevated rates of childhood asthma along the Gambell-Ingra corridor.

To reduce air quality hazards and health inequity, add a new objective:

- Acres and number of residents impacted by through-traffic projects (high volume or high speed traffic with low percentage of local trip destinations) (New 5A-4 or 4E-1).

Greenhouse Gases

Add a performance measure to calculate GHG annually for the current system and to estimate GHG and induced driving for all new vehicular projects (new objective under 5B).

The Anchorage Climate Action Plan commits to 80% reduction of GHG emissions by 2050: it is irresponsible for the MTP 2050 to avoid any commitment or any measurement of GHG. It is critical to add GHG measuring, monitoring, and reduction to the MTP 2050 Performance Measures. Vehicle Miles Traveled is an important proxy measure for pollutants, and for efficient land use but it is not a substitute for measuring GHG emissions. Many cities use models to reasonably estimate GHG emissions. The Dynamix model is one such tool that Juneau is considering. Minneapolis, whose GHG reduction goal is the same as Anchorage's (80% reduction by year 2050), has calculated that it will need to reduce automobile passenger miles by 38%. [Minneapolis Transportation Action Plan](#).

Vehicle Miles Traveled (VMT)

Amend 5A-3: VMT targets should **not be set as a percent of growth**. It is not inevitable to have VMT rise at the same rate as population. An expectation of rising VMT will lead to a cycle of induced demand and worse congestion.

Add new 5A-5 and 5A-6: Specific measurements and mileage targets that differentiate the daily Anchorage Bowl VMT and the daily commute VMT from Eagle River/Chugiak, Mat-Su Borough, and Girdwood (similar to Boulder, CO). The corridors north and south from the Anchorage Bowl are suited to high-speed transit, which is complementary but different from transit within the Bowl.

Electric Vehicles

Amend 5A-4: Measure the switch from combustion vehicles to electric vehicles, not just the number of charging stations (Boulder, CO measures percent of electric vehicles).

Another amendment to 5A-4: Electric charging stations should be measured as a ratio to number of electric vehicles.

New Active Transportation performance measurements

Under Objective 5E, promotion of Active Transportation, delete references to performance measures 6A-1, 6A-2 and 6A-5. Those three proposed measures are for transit, not Active Transportation, and would measure only Environmental Justice (EJ) areas.

New measures should be included here:

5E-1: Percent of residents within 15-minute walkable zones (see, Boulder, Co).

5E-2: Percent of non-vehicular trips to schools and jobs (active transportation commuting).

Goal 6. Advance Equity

Multi-modal access for underserved neighborhoods

Replace 6A-5 which measures tactics (percent of spending within EJ areas) rather than equity outcomes.

Add new Performance measures 6A-5 and 6A-6 that measure access for vulnerable populations (per Boulder, CO equity plan):

- percent of population with access to comfortable walkways and bikeways; and
- percent of population with access to local and regional transit.

Consider a new equity objective 6D: Complete Neighborhoods (For example, Minneapolis 2040 plan has an objective that all Minneapolis residents will have access to employment, retail services, healthy food, parks, and other daily needs via walking, biking, and public transit).

Minimize adverse impacts

Add a reference to a new performance measure under 6B, which calls for minimizing impacts to existing neighborhoods.

- Acres and number of residents impacted by through-traffic projects (high volume or high speed traffic with low percentage of local trip destinations) (New 5A-4 or 4E-1).

Under 6B, remove the cross-references to 3C-1 and 5D-1 as it is tokenism to assume that a project that has gone through a NEPA review or Context Sensitive Solutions review has minimized impacts to the neighborhoods. Those processes require evaluation and feedback which can be accomplished with the addition of performance requirements to measure:

- Cut-through traffic deterrence and other traffic calming to match traffic speeds to local land use (6B-1);
- Safe at-grade crossings (6B-2);
- Noise abatement features (6B-3); and
- Hardscape abatement features (6B-4).

Public participation by underrepresented groups

Delete 6C-1. Allocating more of the public involvement budget to engage vulnerable populations is a tactic, not an outcome. It is not worth measuring either outreach or public involvement.

Add a reference to a new performance measure under 6C, which measures responsiveness to public concerns. This could be based upon comments received on a particular topic, scored according to commenter (e.g., community council, professional organization, individual), and if/how the program has been adjusted to reflect that concern. The AMATS system has been unresponsive to grassroots public involvement throughout the final process for MTP 2040 and the beginning of the MTP 2050. Inclusion of such a metric would allow AMATS and the public to see how responsive AMATS is to the concerns of specific community groups and the community at large.