

2050 MTP Performance Measures and Criteria Comment Response Summary

#	Section	Comment	Comment Received From	Staff Response	AMATS Staff Recommendation
1	Criteria	Overall, these goals should parallel the TIP criteria for cohesiveness.	Bicycle & Pedestrian Advisory Committee	Staff agrees. Thank you for your comment.	No recommended change.
2	Performance Measures - Goal 1B	How does the railroad integrate into this goal?	Bicycle & Pedestrian Advisory Committee	The ARRC provides resiliency to Alaska through the movement of cargo to and from the AMATS area.	No recommended change.
3	Criteria - Goal 3	ADA accessibility should warrant more points.	Bicycle & Pedestrian Advisory Committee	Goal 3 has the same amount of points possible as the other goals. To increase the ADA accessibility, another criterion within goal 3 would need to be reduced. ADA accessibility is also covered under other criterion within Goals 3, 4, and 5.	No recommended change.
4	Criteria - Goal 3	Can we state that improvements to pedestrian networks is inclusive of all facilities not just the high priority ped networks from the NMP.	Bicycle & Pedestrian Advisory Committee	The Pedestrian network criteria does not limit this to the high priority pedestrian network of the NMP.	No recommended change.
5	Performance Measure 1	is "Maintain Existing Infrastructure," but none of the performance measures deal with nonmotorized facilities. Can one or more Performance Measures be added to 1A specifically referring to the percentage of nonmotorized facilities (or miles) with pavement in Good vs Poor condition? And perhaps another to measure the effectiveness of winter maintenance, e.g. average time after snowfall to clear all (or 80% or something) of the nonmotorized facilities?	Bicycle & Pedestrian Advisory Committee	1A represent the federally required measures. Adding a measure of the pavement condition of non-motorized facilities is difficult as AMATS, DOT&PF, and the MOA don't have that data readily available. This is something that needs to be looked into more. Increasing winter maintenance is outside the scope of what the MTP/AMATS can accomplish. While AMATS is able to provide some funding for equipment, which can help, the majority of funding has to come from the State or the MOA.	Staff recommends adding pavement condition performance measures for non-motorized facilities within the AMATS area. This will take looking into the data needed for baseline and what is currently available.
6	Performance Measures	Goals and initiatives are good but how is maintenance going to be incorporated for new projects?	Bicycle & Pedestrian Advisory Committee	The 2050 MTP will have a section talking about maintenance, both pavement and winter.	No recommended change.
7	Criteria - Goal 3	Actually applies to "Improves Transportation System Efficiency" criterion (+2 points) . . . consider changing "reduce congestion" to "reduce demand for vehicles"	Brad Coy	This is already accomplished under the first +2. The second +2 is a duplicate of the first +2 and should be removed and the points increased to the max possible.	Staff recommends removing the +2 for reducing congestion in all columns and reallocate points to the first criterion. Staff recommends updating the Goals and Objectives to remove "congestion".
8	Criteria - Goal 1	Make +12 points apply to transit-supporting infrastructure on "Transit Corridors" ("Transit Supportive Development") and create another level (+6 or +8 points) on non-Transit Corridors . . . consider where else a similar change could be made	Brad Coy	Staff agrees.	Staff recommends the following changes to "Improved Existing Surface Transportation Infrastructure Condition" criterion for Transit Projects: +12 Project improves the condition of transit supporting infrastructure along Transit Supportive Development Corridor(s) +8 Project improves the condition of transit supporting infrastructure outside of Transit Supportive Development Corridor(s) +0 Project does not improve the condition of transit supporting infrastructure
9	Criteria - Goal 6	For all project types and the criteria in general, consider changing "mobility" to "accessibility to desired destinations" to account for the true purpose of transportation (not just to be moving, but actually to arrive somewhere)	Brad Coy	This helps clarify the intent of "mobility"; language will be updated. In Goal 3, use of the term "mobility options" encompasses the availability/accessibility of options to reach a destination as well as the efficiency of those options (emphasizing non-SOV options).	Staff recommends updating the word "mobility" in the Performance Measures, Criteria, Goals, and Objectives to "accessibility to desired destinations".
10	Criteria - Goal 4	For all project types, incorporate the idea of creating a sense of place by adding language about "bicycle/ped connections to adjacent land uses" . . . not just access to major employment or commercial areas, but also connections within them	Brad Coy	Language added to include internal connections.	Staff recommends adding the language "bicycle/pedestrian connections to and within land uses" where appropriate in Goal 4 criteria.
11	General	How can "Project improves the surface condition of existing roads and nonmotorized infrastructure" gain 10 points, when "Project is expected to help improve air quality and/or reduce greenhouse gas emissions in a health equity focus area within the top concentration" gain only 5 points? What basis does AMATS have for setting pavement condition above climate change in setting spending priorities?	Cheryl Richardson	These criteria should be looked at within the context of the rest of the criteria. Climate change is addressed through multiple criteria: Improvements to Bicycle and Pedestrian Network, Improves Transit Access and Accommodations, Improves Transit Performance, Improves Transportation System Efficiency, Support Major Employment and Commercial Areas, Incorporates Land Use Context, Improves Air Quality/GHG, Reduce VMT, Promotes Healthy Lifestyle, and EJ Mobility all help to contribute towards helping with reducing GHG, improving Air Quality and helping deal with climate change. Surface condition is only addressed in one criteria, the surface condition criterion in Goal 1, with a supporting criterion in reduced VMT. A project that can meet all the criteria that help to address climate change far outweigh a project that only address surface condition.	No recommended change.
12	General	Aaron, ACC will not submit MTP 2050 comments this round because we find too many of our previous years of comments have been dismissed out of hand, and we have no reason to believe our spending hours repeating our comments will be well invested or those comments taken more seriously. While we appreciate AMATS proposals to increase bike ped mobility in AMATS latest TIP proposal, AMATS proposed MTP 2050 performance standards and project ranking criteria are too distant from years of Anchorage's documented public opinion for us to continue commenting at this time. See previous years' MTP and TIP comments regarding linking land use and transportation, air pollution, public health, climate change, safety, neighborhood character, infill and redevelopment, meaningful public process, measuring what we value, testing ranking criteria before applying them, establishing outcome objectives over process. Anchorage Citizens Coalition supports Nancy Pease' MTP 2050 comments, both those she prepares for Rabbit Creek Community Council and those she submits herself as a citizen.	Cheryl Richardson	Thank you for your comment. See the individual responses to Nancy Pease comments.	No recommended change.

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13	General	On what basis did AMATS declare that one MTP goal is equal to another?	Cheryl Richardson	The MTP team worked on developing the MTP goals and objectives by looking at the 2040 MTP, the Federal Goals and National Planning Factors, the State Long Range Transportation Plan Goals and Objectives, and the Local Goals in the 2020 Comprehensive Plan and 2040 Land Use Plan. The 2040 Land Use Plan states "The Goals are organized in a progression of topics, not by order of importance." When trying to decide if the 2050 MTP goals and objectives should be weighted or prioritized the team looked to these documents to help provide guidance. None of the Federal, State, or Local documents have a priority for Goals/Objectives. The MTP team was unable to find a way to decide which Goal/Objective was prioritized over another and left it up to the AMATS Policy Committee and the public to provide direction. While the 2050 MTP received public comments on the goals/objectives and their priority, those comments only listed a few of the goals/objectives and put them as equally most important. As such, the Criteria for the 2050 MTP are not weighted and given equal points per Goal. Additionally the recently approved TIP criteria are not weighted/prioritized. The MTP criteria matches with the TIP criteria in this regard.	No recommended change.
14	General	When will AMATS Ranking Criteria be tested against actual projects so that people have real world information on which to base their comments?	Cheryl Richardson	While staff recognize that using project scoring test runs as a way to ensure the scoring system meets the intended purpose while mitigating problematic results (e.g. a high-scoring project that detracts from goals & objectives) makes a lot of sense, in practice, this severely risks tainting the process to support individual/small-group interests over broad community goals & objectives. To explain, it becomes just as likely that stakeholders use their project nominations' scores as the basis for determining the validity of the overall scoring criteria.	No recommended change.
15	Criteria - Goal 1	Add "bridges" to the improves existing surface transportation infrastructure condition	Community Advisory Committee	Staff concurs that "bridges" should be included as an option.	Staff recommends the following changes to Improves Existing Surface Transportation Infrastructure Condition criteria: +10 Project improves the surface condition of existing road or bridges and nonmotorized infrastructure +5 Project improves only the pavement condition of existing roads or bridges
16	Performance Measure 3B-4	We can build facility, but we can't guarantee service	Community Advisory Committee	This is correct, operating funding for transit primarily comes from property tax revenue and it is approved by the Mayor and Assembly.	No recommended change.
17	Criteria	Project definitions don't have much information. How is the MTP process going to accommodate scoring projects under the criteria when there isn't a lot of definition at that stage?	Community Advisory Committee	Project scoring criteria for the MTP were developed with this in mind--the project team needed to balance the understanding that there will usually not be the same level of project detail that one would expect for a TIP project vs. ensuring those who nominate MTP projects put in the necessary amount of thought/detail to (1) determine how/whether the project will further (or detract from) MTP goals & objectives, and (2) help staff provide rough order of magnitude costs for projects expected to further goals & objectives. This is evident when comparing MTP and TIP scoring criteria. Also note that MTP selection criteria development is staggered from TIP criteria development (these are two separate but related processes); this allows one to inform the other with each iteration. The draft prioritization criteria, in combination with the nomination form content (upcoming), attempts this balance.	No recommended change.
18	Performance Measure 5D-1	What is this saying? Wouldn't all projects without a FONSI have a NEPA review before they begin? -- Or is this just for projects "on the shelf" and are just waiting for funding?)	Community Advisory Committee	This performance measure may not be serving it's intended purpose.	Staff recommends deleting 5D-1. Staff also recommends more research into additional performance measures that can help with 5D and 3C for future MTP updates.
19	Performance Measure 3C-2	-- add "and Street Typology Plan"	Community Advisory Committee	Staff agrees this is a good idea; however, AMATS does not have a Street Typology Plan at this time. This is better addressed as an Action Item for future MTP updates to consider adding as part of the Performance Measures.	Staff recommends adding an action item about the Street Typology Plan development.
20	Performance Measure 3D-2	how is % of employment measured?	Community Advisory Committee	Transit measures the percent of jobs, by Traffic Analysis Zone, that are within 1/4 mile of the bus stops along each route. The data is pulled from the 2016 (5- Year estimates) Census Transportation Planning Products (CTPP) dataset. CTPP data gives us a more accurate account of jobs by actual location.	No recommended change.
21	Performance Measure 3H-1 and 3H-2	Measure the actual benefit: % of road- or pathway-miles that have a snow buffer	Community Advisory Committee	Staff agrees the lanauge for 3H-2 can be updated to be clearer.	Staff recommends editing 3H-2 to the following "Percentage of sidewalk miles with a snow storage buffer."
22	Performance Measure 4B-1	This doesn't really measure the objective. Is tourism spending strongly linked to transportation improvements?	Community Advisory Committee	All things being equal tourism spending presumably would increase with transportation-related improvements.	No recommended change.
23	Performance Measure 4B-2	Measures that it happened but doesn't measure how complete or effective it is.	Community Advisory Committee	Generally speaking spending on accessibility, aesthetics, and wayfinding can make a positive improvement to the visitor experience.	No recommended change.
24	Performance Measure 4E-1	How many elements is enough? How about "% of road-miles that meet [some complete streets standard]"	Community Advisory Committee	There is no specific standard. Each project can take different amount of elements to do a complete street and needs flexibility depending on the facility.	No recommended change.
25	Performance Measures - 4A	Add in a note that the Land Use Plan does include the 2040 Land Use Plan and the Chugiak/Eagle River Land Use Plan or use comparable criteria	Community Advisory Committee	There should be a note on the criteria that notes the land use is including the 2040 Land Use Plan and the Chugiak-Eagle River Comprehensive Plan.	Staff recommends changing "Land Use Plan" to "current adopted Land Use Plans" throughout the documents. Staff recommends adding the follow note to the criteria document: "Land Use Plans include the 2040 Land Use Plan and the Chugiak-Eagle River Comprehensive Plan."
26	Performance Measures 2A & 2C	Design considerations should account and fit existing use patterns between motorized and non-motorized user	Community Advisory Committee	Design is incorporated into the Municipality's DSM, Design Criteria Manual and Title 21.	No recommended change.
27	Performance Measures -Goal 4	Performance Measures: Section 4 – Support and improve land use for the area and property values on properties affected by the projects.	Community Advisory Committee	This performance measure doesn't help to move the MTP into a new direction and would keep us at the status quo. Staff recommends no change.	No recommended change.

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28	Performance Measure 1B-3	% of all projects? or % of those in seismic/flood zones?	Community Advisory Committee	% of all projects.	No recommended change.
29	Performance Measure 2C-1 and 2C-2	How many elements are enough? just one? grade separation counts? Traffic signals?	Community Advisory Committee	The number of elements will vary depending upon the project and the need. There is no standard number of elements.	No recommended change.
30	General	AMATS MTP ignores years of the public's priorities and testimony. Here is what we have repeatedly asked for: •Ensure transportation investments improve neighborhood and commercial character ie: implement land use priorities.	Dael Devenport	The 2040 MTP incorporated the 2040 Land Use plan throughout the entire document and the 2050 MTP is continuing that incorporation. It is part of the 2050 Goals/Objectives/Performance Measures/Criteria.	No recommended change.
31	General	•Place a priority on air pollution and climate change. MTP needs to implement the Anchorage Climate Action Plan. Transportation projects need to reduce GHG not increase them.	Dael Devenport	The 2050 MTP is incorporating the Anchorage Climate Action Plan. Staff is exploring the possibility of adding a GHG emissions reduction performance measure. More work is needed. Staff is working on developing a new strategic planning model that is anticipated to help not only develop a baseline, but also develop what it will take to achieve a GHG emissions reduction target for the transportation system. AMATS also effects GHG emissions reductions by helping reduce vehicle miles or encouraging vehicle electrification. These are already captured in the performance measures.	Staff recommends adding a new 5A-5 performance measures called "Transportation based Greenhouse Gas Emissions".
32	General	•Don't build projects that will increase air pollution.	Dael Devenport	Thank you for your comment.	No recommended change.
33	General	•Prioritize reducing Vehicle Miles Travelled. Electrification alone will not meet Anchorage's Climate Action Plan benchmarks.	Dael Devenport	The MTP already has a VMT measure, 5A-3, that will be looking at reducing VMT.	No recommended change.
34	General	•Prioritize 'fix it first' before adding new capacity (more lane miles) for vehicles. We can't even maintain the transportation system that we have.	Dael Devenport	This is part of the criteria for the 2050 MTP, Goal 1.	No recommended change.
35	General	•Protect natural areas. Anchorage is distinguished by its natural setting, and protecting the natural setting is important to the economy and public health.	Dael Devenport	This is part of the criteria for the 2050 MTP Goal 5.	No recommended change.
36	General	•Award points for non-motorized connectivity.	Dael Devenport	This is part of the criteria for the 2050 MTP Goal 3.	No recommended change.
37	General	•Support Anchorage's economy by slowing traffic through commercial districts and encourage people to walk and bike from one destination to another - shopping along the way.	Dael Devenport	Traffic speeds are determined by the type of road and adjacent land uses and set by DOT&PF or the MOA traffic departments. The MTP is supportive of Anchorage's economy while also supporting non-motorized transportation.	No recommended change.
38	General	•The MTP should model 15-minute walkable neighborhoods.	Dael Devenport	The travel demand model is used on a regional level and is not configured to analyze 15 minute neighborhoods.	No recommended change.
39	General	•Award points for projects that meet new USDOT safe road designs that reduce speeds and risky driving. Someone should not have to get hurt before we improve safety. Our police force should not have to compensate for poor road design.	Dael Devenport	One of the functions of APD is traffic enforcement regardless of the type of road design. Road design needs to balance a variety of factors, including safety.	No recommended change.
40	Criteria - Goal 2	Safety for all road users should be the priority for all projects.	Jack Brothers	All goals are weighted equally in the draft prioritization criteria, but several criteria outside of the safety goal have the additional effect of promoting safety, such as all the references to pedestrian & transit improvements and reducing VMT. Projects that would reduce safety are penalized under the current draft criteria.	No recommended change.
41	Goal 6	Why? Aren't you going to prefer to favor the economically underprivileged areas? Are you going to run busses or rail lines through tanble town and hillside neighborhoods? Do all in the name of 'equity' does not seem to make sense here - but roads and bridges have becomes political. Do what makes sense first...	James Kvidera	Staff disagrees. Environmental Justice and Equity are high priorities for AMATS and focusing on these areas will have significant improvements for large numbers of the population. Given their cost/benefit ratio they also provide a substantial value to the community at large.	No recommended change.
42	Performance Measure 3A-5	I would suggest being more specific: Percentage of programmed projects that incorporate TSMO, TDM or ITS in order to improve mobility, efficiency, resiliency of the system.	Marc Luiken	The MTP team wanted to be more encompassing with this performance measure without having to list out every possible idea or plan.	Staff recommends adding "in order to improve mobility, efficiency, resiliency of the system." to the end of performance measures 3A-5.
43	Criteria - General	Thank you, guardedly, for this opportunity to comment on the Project Prioritization Criteria of the Metropolitan Transportation Plan 2050. I hesitate to call this an opportunity, because in the past three or four years, I have witnessed that the public comment process has no meaningful influence on the drafting of AMATS plans or policies. Public comments are being treated either as a pro forma exercise, or as a nuisance. Case in point: at today's AMATS Policy Committee meeting (3-31-22), a committee participant said that she "hopes that public comments on the draft TIP will be minor, because if the public wants significant changes, that would require new rounds of interagency meetings." This is a staff response I've heard several times: significant response to public comments would cause too much work and take too much time. The public deserves a say: AMATS is charged with making monumental decisions about where and how to invest several billion dollars of public money.	Nancy Pease	The comment from the Technical Advisory Committee member is being taken out of context. The TAC member was referring to the fact that if the 2023-2026 draft TIP develops the Interagency Consultation Air Quality Conformity document before public comments, then it would have to go through additional interagency review and redevelopment of the air quality conformity if the changes from the public comment period were significant. The 2023-2026 TIP schedule was updated to have the public comment period before the interagency consultation meeting, so any changes from the public comment period could be incorporated by the Policy Committee prior to conformity document development. AMATS public process has had meaningful changes to documents. A good example is the AMATS non-motorized plan that received over 800 commented and made significant changes to that plan. The 2050 MTP has also taken public comments and incorporated changes, see the changes linked on the 2050 MTP website, and the changes being recommended as part of this comment response summary. The public is given a change to provide input on all plans that AMATS develops.	No recommended change.
44	Criteria - Goal 2	•Award emergency response and resilience points to bicycle and ped projects where they can provide cut-through access or alternative access in case of a road closure. 8-foot-wide paths can accommodate emergency vehicles (e.g. police cars). 10-foot-wide paths can accommodate traffic for a short detour.	Nancy Pease	Staff contacted DOT&PF and MOA and asked if this is a possibility and was told no. There are too many safety, coordination, and structural concerns to be able to accommodate this. Other options existing such as diverting traffic down the travel lanes on the opposite side of the roadway.	No recommended change.

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45	Criteria - Goal 2	a. Allow safety points to be awarded preventatively, for hazardous locations that do not have major crashes. A blood sacrifice should not be required to get a safety upgrade.	Nancy Pease	This should match up with the 2023-2026 TIP criteria which allows points to be awarded if an area does not have crash data, but the MOA and DOT traffic sections agree the project could help in crash prevention.	Staff recommends adding in an option to the safety criteria to award points to a project if there is no crash data, but the MOA and DOT&PF traffic engineers agrees the project could help to prevent future crashes. This should mirror the TIP criteria.
46	Criteria - Goal 2	c. Award points for projects that are specifically designed to manage unsafe speeds and risky driver behavior, in accordance with the new USDOT Roadway Safety Strategy.	Nancy Pease	One of the functions of APD is traffic enforcement regardless of the type of road design. Road design needs to balance a variety of factors, including safety.	No recommended change.
47	Criteria - Goal 5	• Award air quality and GHG points in areas of "clean" as well as polluted air.	Nancy Pease	Staff is recommending focusing improvements on GHG and Air Quality in areas were vulnerable populations, those within the health equity focus area, as they are the most impacted by them.	No recommended change.
48	Criteria - Goal 5	• Greatly increase the available points for projects that reduce GHG emissions,	Nancy Pease	The draft criteria award up to 5 points for GHG reductions. Goal 5 has the same amount of points possible as the other goals. To increase the GHG points, another criterion within goal 5 would need to be reduced. Reducing GHG emissions are also covered under other criteria, such as reducing VMT, Land Use Context, Improves Transit Performance, Improves Transit Access, Improves Bike/Ped network, Improves and Transportation System Efficiency.	No recommended change.
49	Criteria - Goal 3	c. The MTP should model induced travel demand. Penalize projects with up to -20 negative points if they induce vehicular travel demand (create more vehicle trips)	Nancy Pease	The AMATS model does model induced travel demand, that is a key feature of the type of model AMATS has been using for years. This is covered with Goal 5 VMT criteria.	Staff recommends increasing the penalty for increasing VMT to -10.
50	Criteria - General	5. <u>Greenhouse gas emissions and vehicle miles traveled.</u> This scoring system shows total disregard for the Anchorage Climate Action Plan (ACAP). ACAP commits Anchorage to reduce GHG emissions 80 percent by 2050. Transportation currently accounts for 52% of local GHG emissions. Anchorage can't even come close to our targeted reductions unless our transportation system measures and reduces GHG emissions. AMATS will need to conduct test runs of the scoring criteria to determine the appropriate assignment of points for GHG reductions. One obvious underscored category in the draft criteria is the meager 2 points (out of 120) for reducing single-occupancy vehicle travel. Vehicle miles traveled (VMT) is sometimes offered as a proxy for GHG reductions. 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 date of our Comp Plan 2020).	Nancy Pease	Performance targets still need to be set. The MTP does take into account the ACAP in Goal 5, Promote a Healthy Environment. Staff is exploring the possibility of adding a GHG emissions reduction performance measure. More work is needed. Staff is working on developing a new strategic planning model that is anticipated to help not only develop a baseline, but also develop what it will take to achieve a GHG emissions reduction target for the transportation system The draft criteria award up to 5 points for GHG reductions. Goal 5 has the same amount of points possible as the other goals. To increase the GHG points, another criterion within goal 5 would need to be reduced. All-in-all, the criteria associated with ACAP are worth 20 points. VMT is a separate criterion, in addition to GHG emission. All within goal 5.	No recommended change.
51	Performance Measure 1A	Goal 1: maintenance Objective 1A. In order to achieve a state of good repair for all modes, • Add an assessment 1A-11 for the conditions of collector and local roads, bike and pedestrian facilities, and transit facilities.	Nancy Pease	Staff concurs these performance measures can be expanded.	Staff recommends adding pavement conditions for the collector and arterial roads (non-NHS) to 1A. Staff recommends adding a pavement condition performance measure for non-motorized facilities within the AMATS area. More effort will be needed to look at the data needed for baseline and what is currently available.
52	Performance Measure Goal 3	• Managing Travel Demand: The draft needs to add targets for managing travel demand in accordance with Objective 3A. 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 of three of every five trips taken in Minneapolis will be by walking, bicycling or transit. (May 14, 2021).	Nancy Pease	Staff agrees.	Staff recommends adding new performance measures 3B-6 Percentage of trips taken by nonmotorized methods (e.g. walking, biking) and 3B-7 Percentage of trips taken by public transportation
53	Performance Measure Goal 3 New Measure	• Measure the percent of destinations that can be accessed by transit (new 3B-7).	Nancy Pease	This is captured in 3D-1 and 3D-2.	No recommended change.
54	Performance Measure Goal 3 New Measure	• Measure the travel mode shift. Compare the ratio of trips by vehicular travel, by transit, biking and walking (new 3B-8).	Nancy Pease	This will be addressed by staff recommendation to add in new performance measures for the percent of trips taken on transit, walking, and biking.	No recommended change.
55	Performance Measure Goal 6 New Measure	• Percent of population with access to local and regional transit	Nancy Pease	This is measured in 6A-1, but just for EJ areas since this is the equity goal.	No recommended change.
56	Performance Measure 3-4A	b. 3-4A: Number of Van Pool users. This is important only as a ratio. The number of riders means little unless it involves a substantial mode shift from private vehicle use, and therefore reduces congestion, parking demand,	Nancy Pease	Staff agrees.	Staff recommends changing 3A-4 to "Number of vehicles mile reduced by vanpool participants."

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57	Performance Measure Goal 4 New Measure	<p>Goal 4. Support the Economy</p> <p>This economy section is missing two critical performance measurements: the interrelation of transportation and compact land use; and accessibility.</p> <p>As stated under the Mobility section, accessibility in an urban area is a strong indicator of economic vitality. Accessibility--convenient sonaccess to lots of destinations--is the very definition of a hub. People and businesses profit when they spend little time or money getting where they need to go.</p> <p>•Add a new objective 4A-3: Average trip length. Short trips are a measure of thriving urban centers with many services and destinations in proximity.</p>	Nancy Pease	Staff has concerns that this can be used to help justify large scale roadway projects that cut through neighborhoods. Additionally this is more directly addressed through Land Use which is outside AMATS purview.	Staff recommends more research be done on adding a new performance measure for "Average trip length" for each mode of travel.
58	Performance Measure Goal 4 New Measure	<p>•Add a new objective 4A-4: Percent of acreage occupied by roads and parking. This is a measure of sprawl and land use efficiency/inefficiency.</p>	Nancy Pease	While AMATS supports the 2040 Land Use Plan, parking lots are not within the purview of AMATS.	No recommended change.
59	Criteria - General	<p>3. <u>Adopted land use plans and policies should be a "screening criterion" for transportation funding.</u> The AMATS scoring system should <u>look first at adopted municipal plans</u> to determine where access should be upgraded or expanded to support residential, commercial, or other uses. Land use is currently treated as a minor category to be checked off partway through the scoring process. AMATS scoring fails to recognize Urban Planning 101: the essential need for intertwined land use and transportation planning.</p>	Nancy Pease	Implementing recommended elements from the current Land Use Plan (LUP) is specifically referenced in the "Incorporates Land Use Context" criterion. Also note that, even though not explicitly stated, many of the other criteria further the intent of the LUP while recognizing what is within AMATS' purview to directly affect (e.g. all of the criteria that promote non-SOV improvements or reduce VMT). AMATS has a limited ability to affect land use planning, other than recommending that future land use plan updates incorporate changes to better align with MTP goals & objectives (e.g. upzoning, growth boundaries, mixed-use/infill development). Planning practice recognizes that transportation options are constrained by land use decision making. For example, while it is certainly possible to provide high-frequency bus service or extensive separated pathways in low-density areas, it is significantly more cost-effective to focus these improvements in higher-density, mixed-use areas where they will be better utilized at a lower per-capita cost--also helping meet environmental and equity goals. Re: first looking at adopted plans to determine where to make improvements, this makes a lot of sense as a way to generate MTP nominations, <i>provided that</i> they align with MTP goals and objectives. Note that a project's inclusion in in other adopted plans should not be a <i>prerequisite</i> for MTP inclusion, since that fails to account for changing circumstances, refined community values, etc.	No recommended change.
60	Criteria - General	<p>2. <u>Lack of clarity about the relative weight for the criteria.</u> It seems arbitrary that each of six categories is equally weighted for 20 points maximum. This is an artificial "balance" that does not reflect any community priorities that I am aware of.</p>	Nancy Pease	<p>The MTP team worked on developing the MTP goals and objectives by looking at the 2040 MTP, the Federal Goals and National Planning Factors, the State Long Range Transportation Plan Goals and Objectives, and the Local Goals in the 2020 Comprehensive Plan and 2040 Land Use Plan. The 2040 Land Use Plan states "The Goals are organized in a progression of topics, not by order of importance." When trying to decide if the 2050 MTP goals and objectives should be weighted or prioritized the team looked to these documents to help provide guidance. None of the Federal, State, or Local documents have a priority for Goals/Objectives. The MTP team was unable to find a way to decide which Goal/Objective was prioritized over another and left it up to the AMATS Policy Committee and the public to provide direction. While the 2050 MTP received public comments on the goals/objectives and their priority, those comments only listed a few of the goals/objectives and put them as equally most important. As such, the Criteria for the 2050 MTP are not weighted and given equal points per Goal.</p> <p>Additionally the recently approved TIP criteria are not weighted/prioritized. The MTP criteria matches with the TIP criteria in this regard.</p>	No recommended change.
61	Criteria - General	<p>4. <u>Land use should account for for a much higher percentage of the project scoring.</u> Currently, land use is given only 5 points out of 120. The weight given to land use should be adjusted through a series of test runs. It is imperative that we invest in transportation that supports efficient and sustainable land use.</p>	Nancy Pease	The "Incorporates Land Use Context" criterion is given 8 possible points. Also note that, even though not explicitly stated, many of the other criteria do further the intent of the LUP while recognizing what is within AMATS' purview to directly affect (e.g. all of the criteria that promote non-SOV improvements or reduce VMT). This means that project nominations that align with LUP recommendations are highly likely to score well in a broad range of other criteria across multiple goals. To further improve the criteria staff is recommending adding a penalty to the criteria for projects that don't incorporate land use context.	Staff recommends adding a penalty to the Incorporates Land Use Context criterion.

2050 MTP Performance Measures and Criteria Comment Response Summary

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62	Criteria - General	I have read the draft carefully and analyzed how the scoring reflects local adopted plans and goals. I have researched scoring criteria used by several other municipalities. I ask AMATS staff to give open consideration to these and all public comments. General comments 1. The public needs to see how test results of this scoring system. It is difficult for the public to give informed comments about this scoring system without seeing what kinds of projects earn the highest scores. Surely, AMATS has done several test runs of these ranking criteria, and used those test runs internally to adjust the criteria. The public should see those test runs.	Nancy Pease	While staff recognize that using project scoring test runs as a way to ensure the scoring system meets the intended purpose while mitigating problematic results (e.g. a high-scoring project that detracts from goals & objectives) makes a lot of sense, in practice, this severely risks tainting the process to support individual/small-group interests over broad community goals & objectives. To explain, it becomes just as likely that stakeholders use their project nominations' scores as the basis for determining the validity of the overall scoring criteria.	No recommended change.
63	Criteria - Goal 3	a. Increase the available points for projects that reduce single-occupancy vehicle travel	Nancy Pease	Goal 3 has the same amount of points possible as the other goals. To increase the single-occupancy vehicle travel points, another criterion within goal 3 or other criterion outside goal 3 would need to be reduced. Reducing SOV travel is also covered under other criterion within Goals 3, 4, and 5.	No recommended change.
64	Criteria - Goal 3	b. Increase the available points for projects that reduce vehicle miles traveled (VMT) per capita, of all types (including freight)	Nancy Pease	Goal 3 has the same amount of points possible as the other goals. To increase the points, another criterion within goal 3 or other criterion outside goal 3 would need to be reduced. Reducing VMT is also covered under other criterion within Goals 3, 4, and 5.	No recommended change.
65	Criteria - Goal 4	There should be a disqualification option for proposed projects that cause significant negative impacts to the intended land use pattern.	Nancy Pease	The penalties accomplish this intent. Staff is looking at increasing the existing penalties and adding penalties to criteria that don't have any.	Staff recommends increasing penalty amounts for existing penalties and adding new penalties to other criteria that don't have any, where practicable.
66	Criteria - Goal 4	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".	Nancy Pease	Goal 4 has the same amount of points possible as the other goals. To increase the points, another criterion within goal 4 or other criterion outside goal 4 would need to be reduced.	No recommended change.
67	Criteria - Goal 5	Assign greater negative points for projects that induce more driving and increase emissions.	Nancy Pease	Staff is looking at increasing the penalties for all criteria or adding to those that don't have penalties	Staff recommends increasing penalty amounts for existing penalties and adding new penalties to other criteria that don't have any, where practicable.
68	Criteria - Goal 5	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.	Nancy Pease	Staff is looking at increasing the penalties for all criteria or adding to those that don't have penalties	Staff recommends increasing penalty amounts for existing penalties and adding new penalties to other criteria that don't have any, where practicable.
69	Criteria - Goal 5	Vehicle Miles Traveled is an important proxy and deserves far more than 5 points.	Nancy Pease	Goal 5 has the same amount of points possible as the other goals. To increase the VMT points, another criterion within goal 5 would need to be reduced. Reducing VMT is also covered under other criterion within Goals 3, 4, and 5.	No recommended change.
70	Performance Measure Goal 3 New Measure	Measure active transportation as a viable alternative: percent of population living in a 15-minute walkable neighborhood (new 3E5)(based on Boulder CO)(new 3B-6)	Nancy Pease	The existing performance measures were selected based on the changes that AMATS can implement--the effectiveness of these measures depends on LUP decisions. Increasing the percentage of the population within a 15-minute walkable neighborhood is driven by land use policies that lead to compact, mixed-use development while also having supportive transportation infrastructure. Adding sidewalks/transit service to a low-density area doesn't automatically make it a 15-minute neighborhood in areas where the LUP doesn't allow a mix of uses or the minimum density to support regular transit service, etc., BUT it complements future LUP changes that make it possible. Given the reality of fiscal constraint, it makes the most fiscal sense to direct these types of investments to areas where they can have the greatest impact, and these are the areas where the LUP encourages more compact, mixed use growth.	No recommended change.
71	Performance Measure Goal 3 New Measure	Objectives 3A and 3E, to support land use and reduce congestion, need specific performance measures. Add measures: Reduction in peak-hour demand from travel demand management(3A-6)	Nancy Pease	The distinction between peak-hour demand vs. total demand is less important given the objective to reduce VMT. The focus on peak-hour congestion is generally used to justify auto-centric solutions, since drivers are directly affected. Increased lane efficiency is largely accomplished through more efficient travel modes for moving people (e.g. transit) paired with demand management for SOVs. The example of a directional shift in lanes to meet peak commute demand is actually counterproductive for objectives like reducing VMT and GHG emissions, since it does the same thing as adding lanes: reducing the felt consequence by those who are creating the congestion (i.e. drivers). As a rule, significant mode shifts will not occur until the marginal financial and/or time costs of driving exceed individuals' threshold to pay/wait WHEN there is an alternative with lower financial/time costs. FHWA already requires a performance measures for peak-hour excessive delay per capita, 3E-1.	No recommended change.
72	Performance Measure Goal 3 New Measure	Increased efficiency of use of existing lanes from innovative technology (e.g. directional shift of lanes to meet peak commute demand) (3E-3).	Nancy Pease	Increased lane efficiency is largely accomplished through more efficient travel modes for moving people (e.g. transit) paired with demand management for SOVs. The example of a directional shift in lanes to meet peak commute demand is actually counterproductive for objectives like reducing VMT and GHG emissions, since it does the same thing as adding lanes: reducing the felt consequence by those who are creating the congestion (i.e. drivers). As a rule, significant mode shifts will not occur until the marginal financial and/or time costs of driving exceed individuals' threshold to pay/wait WHEN there is an alternative with lower financial/time costs.	No recommended change.
73	Performance Measure 5A-3	Vehicle Miles Traveled. 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.	Nancy Pease	The MTP does have a VMT measure, 5A-3, that will be looking at reducing VMT.	No recommended change.
74	Performance Measure 5D-1	5D-1 percentage of projects eligible projects that have successfully completed NEPA review. NEPA review is a required federal process for some projects This tells the public nothing about whether the project "promotes a healthy environment".	Nancy Pease	This performance measure may not be serving its intended purpose.	Staff recommends deleting 5D-1. Staff also recommends more research into additional performance measures that can help with 5D and 3C for future MTP updates.

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75	Performance Measure 6C-1	6C-1: percentage of public involvement budget that is aimed at vulnerable populations. This is almost farcical. Why spend more money trying to encourage public comments when the AMATS process dismisses or disregards most of them?	Nancy Pease	Public participation is an integral part of the transportation process. Diversifying the input received and building the list of engaged stakeholders will help AMATS understand what improvements the community as a whole truly supports.	Staff recommends changing performance measure 6C-1 to: "Number of new engaged community members in EJ areas of 60th or greater percentile"
76	Performance Measure General	3. Reduce greenhouse gas emissions (GHG). 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 by 80% by 2050. Clearly, Anchorage cannot make its climate action target if AMATS does not measure and reduce GHG from our transportation system. The MTP objectives call for reducing greenhouse gas emissions. Yet, this draft MTP includes no measurement or monitoring for Greenhouse Gas Emissions. AMATS surely has a responsibility to implement the ACAP and to use the examples of other MTOs to measure and reduce GHG emissions. It is critical to add GHG measuring, monitoring, and reduction to the MTP 2050 Performance Measures.	Nancy Pease	The 2050 MTP is incorporating the Anchorage Climate Action Plan. Staff is exploring the possibility of adding a GHG emissions reduction performance measure. More work is needed. Staff is working on developing a new strategic planning model that is anticipated to help not only develop a baseline, but also develop what it will take to achieve a GHG emissions reduction target for the transportation system. AMATS also effects GHG emissions reductions by helping reduce vehicle miles or encouraging vehicle electrification. These are already captured in the performance measures.	Staff recommends adding a new 5A-5 performance measures called "Transportation based Greenhouse Gas Emissions".
77	Performance Measure General	5. Include an annual report card. The public and municipal officials should be able to see progress or failures at a glance, every year. Boulder CO has an example of a one-page, at-a-glance report card. Boulder CO Measurable Objectives 2020 (page 8). This is part of Boulder's complete report on transportation plan progress, written for lay-person understanding. I recommend you read it. https://boulder.colorado.gov/media/1047/download?inline (link was inbedded in comments, added by staff to show in comment response summary)	Nancy Pease	While an annual report card is a worthwhile endeavor, at this time AMATS does not have the staff time/budget to accomplish this task above what is already required. AMATS is already required to report on the performance measures in a system performance report in the MTP. Additionally not all measures are done on an annual basis, some are two or four year targets which means the data will not be available until after the 4 year period to report on them.	No recommended change.
78	Performance Measure General	4. Change the public comment process to allow the public a meaningful chance to influence the MTP. In the last several years of MTP development, AMATS has overwhelmingly dismissed or deferred action on public comments. The "Response to Comments" is printed in miniscule font using an oversized spreadsheet that is very difficult to read: and the responses are dismissive and sometimes rude. Pre-pandemic, AMATS hosted several well-attended open houses for the Non-Motorized Plan and the MTP. Since the pandemic, there has been no forum for community dialogue. AMATS is also ignoring or downplaying important local adopted plans, such as the Anchorage Climate Action Plan and the elements of the Comprehensive Plan.	Nancy Pease	Unfortunately the pandemic curbed many in-person opportunities of engagement. It however implemented a new standard for AMATS meetings that are now recorded and can be participating in remotely or watched at a more convenient time situationally determined by each member of the public. We are happy to welcome the return to in-person engagement with the first public workshop for the 2050 MTP happening in May. As a regional planning body, AMATS looks to its area-wide plans for guidance and incorporates those visions as much as possible. The entity of AMATS, being a federally required regional body hosted by the MOA, is bound by some federal requirements that may not hold true for city planning documents.	Staff recommends a rework of the comment response summary to not be so cumbersome.
79	Performance Measure Goal 3	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". • AMATS should focus on measuring destination access, not mobility. Mobility implies travel speed: how far a person can go in a given amount of time. Accessibility is how much a person can get to in that time (definition provided by strongtowns.org). Destination access requires modeling. I can't give you the exact performance measures: but I'm asking AMATS to make accessibility—how much a person can easily get to—the key measure of connectedness, rather than mobility/travel speed	Nancy Pease	This goal covers both access and mobility, which are key to a successful transportation system. None of the Objectives in Goal 3 are about increasing vehicle speeds.	Staff recommends changing the names of Goal 3 to "Improves Access and Mobility Options".
80	Performance Measure Goal 3 New Measure	• Add two new measures to reflect land use efficiency: o 3E-3 travel time per capita and	Nancy Pease	Staff disagrees. Travel time negatively impacts transit and other modes of non-vehicular travel and heavily favors vehicular usage. It also favors higher speeds. This is not the direction the MTP team is wanting to head. This is better addressed with average trip length.	No recommended change.
81	Performance Measure Goal 3 New Measure	o 3e-4 average trip length. A compact pattern of land use involves shorter travel distances than urban sprawl. Reducing travel distance makes active transportation a competitive choice. It also increases economic productivity and personal leisure time of individuals. Everyone benefits from spending less time "enroute".	Nancy Pease	Staff has concerns that this can be used to help justify large scale roadway projects that cut through neighborhoods. Additionally this is more directly addressed through Land Use which is outside AMATS purview.	Staff recommends more research be done on adding a new performance measure for "Average trip length" for each mode of travel.
82	Performance Measure Goal 3 New Measure	• Measure the induced travel demand from projects (new objective under 3E-4). It is well-documented that adding lanes will induce additional driving, creating a cycle of worsening congestion (e.g. Houston's infamous Katy freeway on I-10 which cost \$2.9 billion to expand to 26 lanes-- and filled right up again).	Nancy Pease	Induced Demand or the demand that results from the reduction in the cost of travel (monetary and opportunity) applies to all modes of travel and should not be applied to roadway expansion alone. While time is one of the factors, safety and comfort improvements, real or perceived, to non-motorized facilities and reliability and frequency improvements to transit could also induce demand for those modes of travel and would be a benefit. Guiding principles for the AMATS Congestion Management Process already suggest that preference be given to demand management strategies that eliminate or reduce travel, while leaving high-cost capacity serving single occupant vehicle travel as a last resort.	No recommended change.

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83	Performance Measure Goal 4 or 5 New Measure	Minimize adverse impacts Add new performance measures under 6B, which calls for minimizing impacts to existing neighborhoods. •Number of residents in EJ areas who are impacted by through-traffic projects (high volume or high speed traffic with low percentage of local trip destinations). (New 5A-4 or 4E-1)	Nancy Pease	Impacts to EJ populations are addressed through performance measures 3C-1 and 5D-1.	No recommended change.
84	Performance Measure Goal 5 New Measures	Add new measures 5D-1, 5D-2, etc •Acres of wetlands impacted	Nancy Pease	This is better addressed as part of the criteria. Staff is looking at increasing the penalty for impacts to sensitive natural areas.	Staff recommends increasing the penalty associated with the criterion Protects Sensitive Natural Area to -10.
85	Performance Measure Goal 5 New Measures	•Acres of open space or park land impacted by transportation system impacts including noise, air pollution, disruption of hydrology, disruption of wildlife movement.	Nancy Pease	This is better addressed as part of the criteria. Staff is looking at increasing the penalty for impacts to sensitive natural areas.	Staff recommends increasing the penalty associated with the criterion Protects Sensitive Natural Area to -10.
86	Performance Measure Goal 5 New Measures	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. (VMT) 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 do this. The Dynamix model is one such tool that Juneau is looking at. 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. https://go.minneapolismn.gov/goals-strategies/climate (link was inbedded in comments, added by staff to show in comment response summary)	Nancy Pease	The 2050 MTP is incorporating the Anchorage Climate Action Plan. Staff is exploring the possibility of adding a GHG emissions reduction performance measure. More work is needed. Staff is working on developing a new strategic planning model that is anticipated to help not only develop a baseline, but also develop what it will take to achieve a GHG emissions reduction target for the transportation system. AMATS also effects GHG emissions reductions by helping reduce vehicle miles or encouraging vehicle electrification. These are already captured in the performance measures.	Staff recommends adding a new 5A-5 performance measures called "Transportation based Greenhouse Gas Emissions".
87	Performance Measure Goal 5 New Measures	•Add new 5A-: the daily Anchorage Bowl resident VMT	Nancy Pease	This is already covered under 5A-3.	No recommended change.
88	Performance Measure Goal 5 New Measures	•Add new 5A-6: the daily commute VMT from Eagle River/Chugiak, Mat-Su Borough, and Girdwood.	Nancy Pease	This is already covered under 5A-3.	No recommended change.
89	Performance Measure Goal 5 New Measures	Goal 5: Promote a healthy environment Neighborhoods. Great neighborhoods are a critical element of great cities. The draft MTP 2050 has weaker environmental objectives than the MTP 2040 with regard to protection of neighborhoods. Measure the specific adverse impacts to neighborhoods listed in the MTP 2040: •Neighborhood through-traffic movements •Speeding, •Noise •Light pollution	Nancy Pease	AMATS staff is unaware of any methods to directly measure these impacts of a proposed project. These will be identified through the CSS process.	No recommended change.
90	Performance Measure Goal 6 New Measure	Goal 6. Advance Equity Convenience and affordability Add new Performance measures 6A-5 and 6A-6 and 6A-7 that measure access and affordability for vulnerable populations (per Boulder CO equity plan): •Percent of population with access to comfortable walkways and bikeways	Nancy Pease	Staff considers measures under objective 3B, along with performance measure 6A-5 to capture the essence of this concern.	No recommended change.
91	Performance Measure Goal 6 New Measure	•Percent of household budget that low-income residents spend on transportation	Nancy Pease	Performance measure 6A-3 addresses this comment.	No recommended change.
92	Performance Measure Goal 6 New Measure	•Cut-through traffic deterrence and traffic calming (6B-1)	Nancy Pease	This is a design level detail that is outside the scope of the MTP. This will be addressed as part of the CSS process.	No recommended change.
93	Performance Measure Goal 6 New Measure	•Safe at-grade crossings(6B-2),	Nancy Pease	This is a design level detail that is outside the scope of the MTP. This will be addressed as part of the CSS process.	No recommended change.
94	Performance Measure Goal 6 New Measure	•Noise abatement features (6B-3)	Nancy Pease	This is a design level detail that is outside the scope of the MTP. This will be addressed as part of the CSS process.	No recommended change.

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95	Performance Measure Goal 6 New Measure	<ul style="list-style-type: none"> •Landscape abatement features within transportation corridors (e.g. street trees, visual enhancements) (6B-4) 	Nancy Pease	This is a design level detail that is outside the scope of the MTP. This will be addressed as part of the CSS process.	No recommended change.
96	Performance Measure New 1B	<p>Objective 1B: Increase transportation infrastructure resilience to natural hazards.</p> <ul style="list-style-type: none"> •Create new Objectives 1B-3, 1B-4, etc. for performance measures that address climate change hazards and damage. This may require a study to determine, but it would likely include: wildfire response and evacuation, coastal flooding, heat, winds, icing, and winter freeze-thaw conditions. 	Nancy Pease	As stated, determining performance measures that would quantify a project's resiliency to climate change hazards would require additional study. Such a study could not be completed in time to be incorporated into this MTP. The MOA Climate Action Strategy does recommend incorporating climate projections in transportation planning. AMATS will continue to support this plan as much as possible.	No recommended change.
97	Performance Measure Safety General	<p>Objective 1B: Increase transportation infrastructure resilience to natural hazards.</p> <ul style="list-style-type: none"> •Create new Objectives 1B-3, 1B-4, etc. for performance measures that address climate change hazards and damage. This may require a study to determine, but it would likely include: wildfire response and evacuation, coastal flooding, heat, winds, icing, and winter freeze-thaw conditions. 	Nancy Pease	Chapter 2 of the 2019 AMATS Non-Motorized Plan includes an analysis of biking and walking zone level of stress. Along with many other factors, this information helps identify non-motorized projects for programming.	No recommended change.
98	Performance Measure Safety New Measures	<p>Measure the perceived safety (e.g. the stress level) as well as actual safety for biking and walking. The following measures might belong either under the Performance measures for safety, or under mobility options.</p> <ul style="list-style-type: none"> •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 students walking/ biking to school versus buses or vehicles •Percent of residents with a 15-minute safe walking radius to parks, schools and commercial centers •Percent of crossings within community centers that meet standards for universal access and have enhancements for comfort and safety 	Nancy Pease	The existing performance measures were selected based on the changes that AMATS can implement--the effectiveness of these measures depends on LUP decisions. Increasing the percentage of the population within a 15-minute walkable neighborhood is driven by land use policies that lead to compact, mixed-use development while also having supportive transportation infrastructure. Adding sidewalks/transit service to a low-density area doesn't automatically make it a 15-minute neighborhood in areas where the LUP doesn't allow a mix of uses or the minimum density to support regular transit service, etc., BUT it complements future LUP changes that make it possible. Given the reality of fiscal constraint, it makes the most fiscal sense to direct these types of investments to areas where they can have the greatest impact, and these are the areas where the LUP encourages more compact, mixed use growth.	No recommended change.
99	Performance Measure 3A-4, 3B-3	<p>d.3A-4 and 3B-3and similar measures that are worded to count the percentage of projects that "include innovative technology" or " include non-motorized accommodations". These are efforts, not results.</p>	Nancy Pease	Correct. The intent was to indicate an effort is being made to address these needs. Results are expected to be quantified through other measures.	No recommended change.
100	Criteria - Goal 4	<ul style="list-style-type: none"> •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. 	Nancy Pease	Freight traffic needs access to all types of land uses particularly in commercial zones.	No recommended change.
101	Performance Measure 4B-1	<p>Measure the outcomes, not the inputs. Many of the draft AMATS performance measures look at efforts or expenditures, not at outcomes directly credited to AMATS policies. Examples include:</p> <p>a.4B-1 Annual tourism spending within the MPO area. There is no clear causality between transportation investments and tourism revenue. Hotel prices or a few major conventions or cruise ships can make a big difference in tourism revenue. A Glenn Highway to Seward Highway freeway would shunt visitors right through Anchorage at 65 mph without any local spending at all.</p>	Nancy Pease	Tourism as an industry is price sensitive. Generally, the demand for tourism products is price inelastic, holding other factors constant. Tourists can easily access the National Highway System to elsewhere in southcentral Alaska regardless of the Seward-Glenn Highway project.	No recommended change.
102	Performance Measure 5A-1	<p>2. Avoid token measures that do not reflect real progress. Many of the draft AMATS performance measures appear to award points for token inclusion of safety or environmental or active transportation elements. For examples:</p> <p>a.5A-1: Number of publicly available electric charging stations. . This doesn't tell whether the charging stations are adequate to encourage a shift to electric vehicles</p>	Nancy Pease	AMATS has a very limited role in helping to switch to electric vehicle usage for personal use. Publicly available electric charging stations are one way to help. Staff is trying to find a good measure that can reflect what AMATS can actually affect as part of the transportation planning process. One option might be to help with electrifying the MOA and DOT&PF fleet vehicles. While this is mostly outside AMATS control, the recently passed infrastructure bill allows the Carbon Reduction program to put funding towards electric infrastructure. Staff is reaching out to FHWA to see if this is an eligible use of the funding. If so, a performance measure can be added to the MTP.	If the new Carbon Reduction program can fund electric vehicles for MOA/DOT&PF fleet, then Staff recommends adding a new performance measure in 5A: "Percentage of MOA and/or DOT&PF fleet vehicles that are electric."
103	Performance Measures - General	<p>3. There should a new performance measures for the MTP: An annual report card to the public on progress toward the objectives and targets of the long-range plans. This should be presented in simple lay-person language, and it should 'grade' AMATS on 10 or so measurable objectives that the public chooses. The grades on the report card should be graded through an interactive review by lay persons and AMATS staff. A link to the Boulder CO transportation report card is offered as an example (scroll to page 8). Boulder CO transportation report card</p> <p>In fact, the whole Boulder Transportation Report on Progress would make enlightening reading for AMATS. This report explains objectives and reports on progress in a very reader-friendly format. There are numerous graphic, maps and pictures that let readers see where the transportation system is reaching objectives, and where it falls short. This kind of public accountability is important when an agency is charged with spending billions of dollars and literally shaping the city for the next generation.</p>	Nancy Pease	While an annual report card is a worthwhile endeavor, at this time AMATS does not have the staff time/budget to accomplish this task above what is already required. AMATS is already required to report on the performance measures in a system performance report in the MTP. Additionally not all measures are done on an annual basis, some are two or four year targets which means the data will not be available until after the 4 year period to report on them.	No recommended change.

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104	Performance Measures - General	<p>Thank you for this opportunity to comment on the draft Performance Measures for the Metropolitan Transportation Plan 2050.</p> <p>I hesitate to call this an opportunity, because opportunity implies that there is a reasonable chance of a beneficial result. My experience, in the past three or four years, is that AMATS public comment process has no influence on AMATS plans or policies (with the exception of the Non-Motorized Plan).</p> <p>A multitude of individuals and groups submitted hundreds upon hundreds of comments on the MTP 2040 and 2050 drafts. In the Response to Comments tables produced by AMATS, the most common response, by far, has been "No Change". Many times, AMATS staff responded that they would defer consideration of a comment (and later, they dropped the issue). Other times, staff dismissed comments for minor technicalities, such as incorrect page references to the draft. Most frequently, the staff gave their stock response of "no change" without a cogent explanation.</p>	Nancy Pease	AMATS takes comments received by members of the public and stakeholder groups seriously and invests a significant amount of staff time responding to those comments. Staff have to balance public comments with federal reporting requirement, staffing, and other resources.	No recommended change.
105	Performance Measures - General	AMATS staff often cite federal deadlines as a reason not to change AMATS draft policies or plans. Staff cite the FHWA timetable as the reason why public comment periods are kept short, why established practices must continue, and why new modeling or technology such as greenhouse gas calculations can't be included in the draft MTP. It seems AMATS is on a perpetual fast-track to federal approval, and the fast-track pressure overrides their willingness to consider ideas from the community. AMATS seems to draft sequential elements of the MTP without pause to incorporate public comments.	Nancy Pease	Failure to comply with federal timeline requirements have negative consequences to AMATS and the community that cannot simply be overlooked or ignored.	No recommended change.
106	Performance Measures - General	AMATS also dismisses or disregards local adopted plans and policies, even though AMATS is a joint municipal-state agency. The chorus line from AMATS is: AMATS has federal mandates and AMATS receives state funding, so we are not required to follow municipal plans. And therefore, they do not. Two examples of this: (1) AMATS is ignoring their obvious responsibility to calculate and pursue the Anchorage Climate Action Plan's targets for greenhouse gas reductions of 80 percent by 2050. (2) AMATS ignores local opposition to DOTPF's favorite projects, even when opposition is backed by Municipal Assembly resolution, as in the case of the Scooter Avenue interchange and Vanguard Drive extension on the Seward Highway	Nancy Pease	<p>AMATS does not disregard or ignore local adopted planed. The 2040 Land Use Plan, the 2020 Comprehensive plan and the Anchorage Climate Action Plan are all integrated into the MTP and other parts of the AMATS process. AMATS has a limited role in helping to implement those plans, as most of the work is on the Municipality of Anchorage to implement them.</p> <p>AMATS works with MOA and DOT to reflect their priorities that come from their plans and is using their money. The Academy/Vanguard project was added in the TIP by the AMATS Policy Committee.</p>	No recommended change.
107	Performance Measures - General	<p>My most important comment, therefore, is that the AMATS public comment process is an exercise in futility. It is a waste of public time and energy and funding. Even worse, this AMATS public process serves to disengage the public from the monumentally important decisions about where and how AMATS will invest several billion dollars. The public comment process needs to be overhauled: and it needs accountability. Here's a start:</p> <p>1. There should be a new approach to timelines in the public process, so that the public can view drafts, ask questions, and give feedback before AMATS staff and committees have invested weeks of time and made up their minds.</p>	Nancy Pease	<p>The public comment process is required by federal law. AMATS makes every attempt to balance public comment and plan adoption process. Public input is guided by AMATS's Public Participation Plan and 2050 MTP requirements.</p> <p>The public are given opportunities to ask questions, give feedback and view drafts on the MTP before the committee make a decision about changes. There have been two public comment periods already with public feedback that have changes being incorporated into the draft documents.</p>	No recommended change.
108	Performance Measures - General	2. There should be opportunities for interaction by Community Councils and specific user groups. Currently, the public has no opportunity to ask questions and get answers. If AMATS staff cannot do this, then perhaps there is an expanded role for the Advisory Committees.	Nancy Pease	There is a public process that incorporates comments of members of the public and community councils. Accommodation of public input has to be balanced to meet all of the federal transportation statutes and regulations while also accounting for the budgets available for the projects.	No recommended change.
109	Criteria - Goal 3	d. The MTP should model 15-minute walkable neighborhoods. Award points for non-motorized connectivity within the boundaries of 15-minute walkable neighborhoods.	Nancy Pease	<p>The MTP already accounts for walkability by incorporating transit supportive development corridors, non-motorized priority corridors and equity analysis.</p> <p>The travel demand model is used on a regional level and is not configured to analyze 15 minute neighborhoods.</p>	No recommended change.
110	Criteria - Goal 5	• Award points for projects that create 15-minute walkable neighborhoods.	Nancy Pease	Land Use density has more impact on creating 15-minute walkable neighborhoods, which is outside AMATS purview. Where AMATS can help is already substantially accomplished with Goal 3 Objectives, Performance Measures, and Criteria.	No recommended change.
111	Criteria - Goal 5	• Protect natural areas: re-write this scoring description. Currently, this scoring description is unlikely to award any points because few projects protect or improve the environment. It seems unlikely that there will be projects that reduce, reroute, or calm traffic in natural areas. Projects should not receive points for ordinary drainage elements.	Nancy Pease	Staff suggests keeping the criteria but including examples of treatments that help to protect natural areas such as the inclusion of bioswales and other natural stormwater treatments, crossings that can be used by wildlife, setbacks to protect wetlands and others.	Staff recommends adding examples of treatments to this criterion. Staff recommends revising language to focus on going beyond requirements to reduce environmental impacts.
112	Criteria - Goal 6	• For projects that burden EJ areas, there should be a disqualification or "do not build" option.	Nancy Pease	The question of burdening EJ areas is case sensitive. The penalties associated with the criterion help to achieve the "do not build" option.	No recommended change.
113	Criteria - Goal 6	• This scoring description invites token points and needs to be more specific. For example, a sidewalk next to an arterial, whether in an EJ area or not, isn't safe, healthy, or time-efficient.	Nancy Pease	Staff disagrees. This criterion needs to be looked at in the context of all the other criteria.	No recommended change.
114	Criteria - Goal 6	• Score projects on whether they offer more affordable, more convenient, safer, healthier, and more time-efficient transportation to vulnerable populations.	Nancy Pease	This criterion needs to be looked at in the context of all the other criteria where these are already addressed.	No recommended change.

2050 MTP Performance Measures and Criteria Comment Response Summary

#	Section	Comment	Comment Received From	Staff Response	AMATS Staff Recommendation
115	Objectives 5D	Protecting the natural setting and open spaces. One of Anchorage's best assets is its natural setting—if we can keep it. The MTP 2050 should restore the specificity of the environmental objectives from the MTP 2040 by expanding Objective 5D: <ul style="list-style-type: none"> Minimize and mitigate impacts on the natural environment, such as water resources, fish and wildlife habitat, watersheds and wetlands and parklands. 	Nancy Pease	This language was removed as it was too limiting. The specificity in the 2040 MTP was only inclusive of those items listed. The 2050 MTP is trying to be more encompassing in all aspects of the natural environment. The CSS and NEPA process already address these environmental objectives and more.	No recommended change.
116	Performance Measure 1A	<ul style="list-style-type: none"> Set a target for 90 percent in good repair. Set a trigger-policy that if the target is missed for more than one year, funds are shifted from new capital spending projects to repair projects. 	Nancy Pease	Targets are set by the State in coordination with the MPO. The targets will be reflected in the MTP. There is already a trigger requirement in place by FHWA.	No recommended change.
117	Performance Measure 1B -3	Objective 1B -3. <ul style="list-style-type: none"> Give credit for nature-based solutions only when these solutions reduce project maintenance or protect the environment significantly in comparison to engineered solutions. 	Nancy Pease	Staff disagrees. Nature based solutions should be given merit without further analysis in to project maintenance and level of environmental significance.	No recommended change.
118	Criteria - Goal 2	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.	Rabbit Creek Community Council	Staff contacted DOT&PF and MOA and asked if this is a possibility and was told no. There are too many safety, coordination, and structural concerns to be able to accommodate this. Other options existing such as diverting traffic down the travel lanes on the opposite side of the roadway.	No recommended change.
119	Criteria - Goal 2	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).	Rabbit Creek Community Council	This should match up with the 2023-2026 TIP criteria which allows points to be awarded if an area does not have crash data, but the MOA and DOT traffic sections agree the project could help in crash prevention.	Staff recommends adding in an option to the safety criteria to award points to a project if there is no crash data, but the MOA and DOT&PF traffic engineers agrees the project could help to prevent future crashes. This should mirror the TIP criteria.
120	Performance Measure 2C-1 and 2C-2	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 https://bouldercolorado.gov/media/1045/download?inline= (link was inbedded in comments, added by staff to show in comment response summary)	Rabbit Creek Community Council	Design standards are set by the MOA and DOT&PF and outside what AMATS can include in the MTP. Staff can working with MOA and DOT&PF on this topic more.	No recommended change.
121	Criteria - General	<u>Lack any form of a test run</u> . 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.	Rabbit Creek Community Council	While staff recognize that using project scoring test runs as a way to ensure the scoring system meets the intended purpose while mitigating problematic results (e.g. a high-scoring project that detracts from goals & objectives) makes a lot of sense, in practice, this severely risks tainting the process to support individual/small-group interests over broad community goals & objectives. To explain, it becomes just as likely that stakeholders use their project nominations' scores as the basis for determining the validity of the overall scoring criteria.	No recommended change.
122	Criteria - Goal 3	Provide up to 20 negative points for projects that cause induced vehicular travel demand (create more vehicle trips).	Rabbit Creek Community Council	The AMATS model does model induced travel demand, that is a key feature of the type of model AMATS has been using for years. This is covered with Goal 5 VMT criteria.	Staff recommends increasing the penalty for increasing VMT to -10.
123	Criteria - General	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.	Rabbit Creek Community Council	All the goals of the MTP are equally weighted. Goal 5 address the ACAP and the criteria within are worth 20 points. This includes GHG reductions and VMT reductions. In addition to these criteria, there are other criteria that promote alternative modes (see goal 3). They are also worth 20 points. The byproducts of these are also GHG and VMT reductions. In all, up to 40 points are awarded to implementing the ACAP.	No recommended change.
124	Performance Measure 4B	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)	Rabbit Creek Community Council	There are many drivers of employment growth. Staff recommends no change.	No recommended change.
125	Performance Measure 4C	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: <ul style="list-style-type: none"> auto travel times (4C-1); transit travel times (4C-2); and bike travel times (4C-3). 	Rabbit Creek Community Council	Staff disagrees. Travel time negatively impacts transit and other modes of non-vehicular travel and heavily favors vehicular usage. It also favors higher speeds. This is not the direction the MTP team is wanting to head. This is better addressed with average trip length. A definition of "Adaptability" can be provided.	Staff recommends adding a definition of "Adaptability" to MTP document.

2050 MTP Performance Measures and Criteria Comment Response Summary

#	Section	Comment	Comment Received From	Staff Response	AMATS Staff Recommendation
126	Performance Measure 5E	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.	Rabbit Creek Community Council	Staff agrees, except for 6A-5, which is directly related to non-motorized improvements.	Staff recommends removing reference to 6A-1 and 6A-2 as part of measures 5E.
127	Performance Measure 6A-5 and 6A-6	percent of population with access to local and regional transit.	Rabbit Creek Community Council	This is measured in 6A-1, but just for EJ areas since this is the equity goal.	No recommended change.
128	Performance Measure New 5A-5 and 5A-6	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	Rabbit Creek Community Council	AMATS looks at regional VMT.	No recommended change.
129	Performance Measure New Measure 3B-6	Measure transit parity: miles of bus-only lanes or transit-advantaged corridors (e.g., as done by Minneapolis) (new 3B-6).	Rabbit Creek Community Council	Anchorage has no bus-only lanes. Transit travel time ratio is included in 3G-5, which would account for corridor improvements like traffic signal priority.	No recommended change.
130	Performance Measure New Measure 3B-7	Measure accessibility: the percent of destinations that can be accessed by transit (new 3B-7).	Rabbit Creek Community Council	This is captured in 3D-1 and 3D-2.	No recommended change.
131	Performance Measure New Measure 3E-6	Measure the travel mode shift by measuring the ratio of trips by vehicular travel, transit, biking, and walking (new 3B-6).	Rabbit Creek Community Council	Staff agrees new measures can be added.	Staff recommends adding new performance measures 3B-6 Percentage of trips taken by nonmotorized methods (e.g. walking, biking) and 3B-7 Percentage of trips taken by public transportation
132	Performance Measure New Measure 4B-3	Measure the ratio of transit service hours and bike system miles to employment growth (see, Boulder, CO for example) (new 4B-3).	Rabbit Creek Community Council	There are many drivers of employment growth. Staff recommends no change.	No recommended change.
133	Performance Measures - 2C-3 - 2C-6	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).	Rabbit Creek Community Council	Staff agrees new measures can be added.	Staff recommends adding new performance measures 3B-6 Percentage of trips taken by nonmotorized methods (e.g. walking, biking) and 3B-7 Percentage of trips taken by public transportation
134	Performance Measures - Goal 3	The 2040 Land Use Plan identifies Transit Corridors, and it would be beneficial to include measures showing whether the Transit Corridors are effectively changing the land use to be more transit oriented and increasing the transit mode split.	Rabbit Creek Community Council	This is captured in 3D-1 and 3D-2. As more development occurs within TSDC, the increase of jobs and activity centers accessible by transit will increase.	No recommended change.
135	Performance Measures - New 1B-3	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.	Rabbit Creek Community Council	This would be difficult to identify at the MTP project level.	No recommended change.
136	Performance Measures - New 1B-3-5	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.	Rabbit Creek Community Council	Data was already available for the seismic and flooding. These other items represent too much data collection efforts that currently have no budget for funding. Additionally all roads are subject to these elements and there is no way to meaningfully distinguish between areas.	No recommended change.
137	Performance Measure 3A and 3E	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.	Rabbit Creek Community Council	Staff recommends no change.	No recommended change.
138	Criteria - General	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.	Rabbit Creek Community Council	The MTP team worked on developing the MTP goals and objectives by looking at the 2040 MTP, the Federal Goals and National Planning Factors, the State Long Range Transportation Plan Goals and Objectives, and the Local Goals in the 2020 Comprehensive Plan and 2040 Land Use Plan. The 2040 Land Use Plan states "The Goals are organized in a progression of topics, not by order of importance." When trying to decide if the 2050 MTP goals and objectives should be weighted or prioritized the team looked to these documents to help provide guidance. None of the Federal, State, or Local documents have a priority for Goals/Objectives. The MTP team was unable to find a way to decide which Goal/Objective was prioritized over another and left it up to the AMATS Policy Committee and the public to provide direction. While the 2050 MTP received public comments on the goals/objectives and their priority, those comments only listed a few of the goals/objectives and put them as equally most important. As such, the Criteria for the 2050 MTP are not weighted and given equal points per Goal. Additionally the recently approved TIP criteria are not weighted/prioritized. The MTP criteria matches with the TIP criteria in this regard.	No recommended change.

2050 MTP Performance Measures and Criteria Comment Response Summary

#	Section	Comment	Comment Received From	Staff Response	AMATS Staff Recommendation
139	Criteria - General	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. <ul style="list-style-type: none"> 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. 	Rabbit Creek Community Council	Implementing recommended elements from the current Land Use Plan (LUP) is specifically referenced in the "Incorporates Land Use Context" criterion. Also note that, even though not explicitly stated, many of the other criteria further the intent of the LUP while recognizing what is within AMATS' purview to directly affect (e.g. all of the criteria that promote non-SOV improvements or reduce VMT). AMATS has a limited ability to affect land use planning, other than recommending that future land use plan updates incorporate changes to better align with MTP goals & objectives (e.g. upzoning, growth boundaries, mixed-use/infill development). Planning practice recognizes that transportation options are constrained by land use decision making. For example, while it is certainly possible to provide high-frequency bus service or extensive separated pathways in low-density areas, it is significantly more cost-effective to focus these improvements in higher-density, mixed-use areas where they will be better utilized at a lower per-capita cost--also helping meet environmental and equity goals. Re: first looking at adopted plans to determine where to make improvements, this makes a lot of sense as a way to generate MTP nominations, <i>provided that</i> they align with MTP goals and objectives. Note that a project's inclusion in other adopted plans should not be a <i>prerequisite</i> for MTP inclusion, since that fails to account for changing circumstances, refined community values, etc.	No recommended change.
140	Criteria - Goal 2	The scoring for “security” emphasizes street lights and emergency phones. It seems redundant with scoring for safety.	Rabbit Creek Community Council	To clarify, the safety criterion emphasizes reductions to <i>unintentional</i> harm (e.g. reducing intermodal conflicts and other crash risks), whereas the security criterion emphasizes reductions/deterrents to <i>intentional</i> harm (e.g. improved lighting and sight lines to better avoid and report potential/actual nefarious conduct).	No recommended change.
141	Criteria - Goal 3	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.	Rabbit Creek Community Council	These are design level details that are outside the MTP scope. These are also already covered as part of the existing criteria and do lead to projects being implemented that address these issues. See the Fireweed Lane Rehabilitation and Spenard Road Rehabilitation projects.	No recommended change.
142	Criteria - Goal 3	Award more points for projects that reduce single-occupancy vehicle travel (up to 6).	Rabbit Creek Community Council	Goal 3 has the same amount of points possible as the other goals. To increase the single-occupancy vehicle travel points, another criterion within goal 3 would need to be reduced. Reducing SOV travel is also covered under other criterion within Goals 3, 4, and 5.	No recommended change.
143	Criteria - Goal 3	Award more points for projects that reduce Vehicle Miles Traveled (VMT) per capita (up to 10).	Rabbit Creek Community Council	There is no specific VMT reduction in Goal 3, that is in Goal 5. Goal 5 has the same amount of points possible as the other goals. To increase the VMT points, another criterion within goal 5 would need to be reduced. Reducing VMT is also covered under other criterion within Goals 3, 4, and 5.	No recommended change.
144	Criteria - Goal 4	There should be a disqualification option for proposed projects that cause significant negative impacts to the adopted land use plans and policies.	Rabbit Creek Community Council	The penalties accomplish this intent. Staff is looking at increasing the existing penalties and adding penalties to criteria that don't have any.	Staff recommends increasing penalty amounts for existing penalties and adding new penalties to other criteria that don't have any, where practicable.
145	Criteria - Goal 4	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.”	Rabbit Creek Community Council	Implementing recommended elements from the current Land Use Plan (LUP) is specifically referenced in the "Incorporates Land Use Context" criterion. Also note that, even though not explicitly stated, many of the other criteria further the intent of the LUP while recognizing what is within AMATS' purview to directly affect (e.g. all of the criteria that promote non-SOV improvements or reduce VMT). AMATS has a limited ability to affect land use planning, other than recommending that future land use plan updates incorporate changes to better align with MTP goals & objectives (e.g. upzoning, growth boundaries, mixed-use/infill development). Planning practice recognizes that transportation options are constrained by land use decision making. For example, while it is certainly possible to provide high-frequency bus service or extensive separated pathways in low-density areas, it is significantly more cost-effective to focus these improvements in higher-density, mixed-use areas where they will be better utilized at a lower per-capita cost--also helping meet environmental and equity goals.	No recommended change.
146	Criteria - Goal 5	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.	Rabbit Creek Community Council	Staff is looking at increasing the penalties for all criteria or adding to those that don't have penalties	No recommended change.
147	Criteria - Goal 5	Don't limit air quality and GHG points to only areas that already have polluted air.	Rabbit Creek Community Council	Projects that promote alternatives to vehicle use (or at least promote more efficient vehicle use) already accomplish this in a general sense; the focus on health equity focus areas incentivizes investment in areas in most need of air quality improvement and/or most at risk of the negative effects of GHG emissions.	No recommended change.
148	Criteria - Goal 5	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.	Rabbit Creek Community Council	Goal 5 has the same amount of points possible as the other goals. To increase the GHG points, another criterion within goal 5 would need to be reduced. Reducing GHG is also covered under other criterion within Goals 3, 4, and 5.	No recommended change.
149	Criteria - Goal 5	VMT is an important proxy and deserves more than 5 points.	Rabbit Creek Community Council	Goal 5 has the same amount of points possible as the other goals. To increase the VMT points, another criterion within goal 5 would need to be reduced. Reducing VMT is also covered under other criterion within Goals 3, 4, and 5.	No recommended change.
150	Performance Measure 5A-3	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	Rabbit Creek Community Council	The intent is to reduce per capita VMT through the various determinants of per capita VMT.	Change PM 5A-3 to per capita VMT (removed % of growth in parentheses).
151	Performance Measure 5A-4	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).	Rabbit Creek Community Council	How will AMATS contribute to the sale of more electric vehicles?	No recommended change.
152	Performance Measure 5A-4	Another amendment to 5A-4: Electric charging stations should be measured as a ratio to number of electric vehicles.	Rabbit Creek Community Council	How will AMATS contribute to the sale of more electric vehicles?	No recommended change.
153	Performance Measure 6A-5	Multi-modal access for underserved neighborhoods Replace 6A-5 which measures tactics (percent of spending within EJ areas) rather than equity outcomes.	Rabbit Creek Community Council	Staff agrees that the measure should be measured as by value added instead of by a dollar figure.	Change PM 6A-5 to: Number of non-motorized facilities added or improved within EJ area of 60th or greater percentile.

#	Section	Comment	Comment Received From	Staff Response	AMATS Staff Recommendation
154	Performance Measure 6A-5 and 6A-6	Add new Performance measures 6A-5 and 6A-6 that measure access for vulnerable populations (per Boulder, CO equity plan): <ul style="list-style-type: none"> percent of population with access to comfortable walkways and bikeways; and 	Rabbit Creek Community Council	Staff agrees that the measure should be measured as by value added instead of by a dollar figure.	Change PM 6A-5 to: Number of non-motorized facilities added or improved within EJ area of 60th or greater percentile.
155	Performance Measure 6B	Minimize adverse impacts Add a reference to a new performance measure under 6B, which calls for minimizing impacts to existing neighborhoods. <ul style="list-style-type: none"> 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). 	Rabbit Creek Community Council	No project would be initiated that was not addressing an identified transportation issue. Context Sensitive Solutions is the avenue for solving the right problem with all stakeholders part of the process and minimizing impacts on existing neighborhood.	No recommended change.
156	Performance Measure 6B	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:	Rabbit Creek Community Council	No project would be initiated that was not addressing an identified transportation issue. Context Sensitive Solutions is the avenue for solving the right problem with all stakeholders part of the process and minimizing impacts on existing neighborhood.	No recommended change.
157	Performance Measure 6B -1	Cut-through traffic deterrence and other traffic calming to match traffic speeds to local land use (6B-1);	Rabbit Creek Community Council	These are design level details that are outside the MTP scope. These are also already covered as part of the existing criteria and do lead to projects being implemented that address these issues. See the Fireweed Lane Rehabilitation and Spenard Road Rehab	No recommended change.
158	Performance Measure 6C-1	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	Rabbit Creek Community Council	Measuring outreach and public participation is very important. Diversifying the input received and building the list of engaged stakeholders will help AMATS understand what improvements the community as a whole truly supports.	Staff recommends changing performance measure 6C-1 to: "Number of new engaged community members in EJ areas of 60th or greater percentile"
159	Performance Measure 6D	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).	Rabbit Creek Community Council	These are great performance measures that belong in a comprehensive plan not in a regional transportation plan. AMATS would look towards the Anchorage 2040 Land Use Plan and the Chugjak-Eagle River Comprehensive Plan for these considerations as these are the comprehensive plans within the AMATS region.	No recommended change.
160	Performance Measure General	<u>Document how greenhouse gas emissions (GHG) will be reduced.</u> 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.	Rabbit Creek Community Council	The 2050 MTP is incorporating the Anchorage Climate Action Plan. Staff is exploring the possibility of adding a GHG emissions reduction performance measure. More work is needed. Staff is working on developing a new strategic planning model that is anticipated to help not only develop a baseline, but also develop what it will take to achieve a GHG emissions reduction target for the transportation system. AMATS effects GHG emissions reductions by helping reduce vehicle miles or encouraging vehicle electrification. These are already captured in the performance measures.	Staff recommends adding a new 5A-5 performance measures called "Transportation based Greenhouse Gas Emissions".
161	Performance Measure General	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. https://go.minneapolismn.gov/goals-strategies/climate (link was inbedded in comments, added by staff to show in comment response summary)	Rabbit Creek Community Council	The 2050 MTP is incorporating the Anchorage Climate Action Plan. Staff is exploring the possibility of adding a GHG emissions reduction performance measure. More work is needed. Staff is working on developing a new strategic planning model that is anticipated to help not only develop a baseline, but also develop what it will take to achieve a GHG emissions reduction target for the transportation system. AMATS effects GHG emissions reductions by helping reduce vehicle miles or encouraging vehicle electrification. These are already captured in the performance measures.	Staff recommends adding a new 5A-5 performance measures called "Transportation based Greenhouse Gas Emissions".
162	Performance Measure General	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). https://bouldercolorado.gov/media/1047/download?inline (link was inbedded in comments, added by staff to show in comment response summary)	Rabbit Creek Community Council	While an annual report card is a worthwhile endeavor, at this time AMATS does not have the staff time/budget to accomplish this task above what is already required. AMATS is already required to report on the performance measures in a system performance report in the MTP. Additionally not all measures are done on an annual basis, some are two or four year targets which means the data will not be available until after the 4 year period to report on them.	No recommended change.
163	Performance Measure General	<u>Reflect input from the public comment process.</u> 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.	Rabbit Creek Community Council	Unfortunately the pandemic curbed many in-person opportunities of engagement. It however implemented a new standard for AMATS meetings that are now recorded and can be participating in remotely or watched at a more convenient time situationally determined by each member of the public. We are happy to welcome the return to in-person engagement with the first public workshop for the 2050 MTP happening in May. As a regional planning body, AMATS looks to its area-wide plans for guidance and incorporates those visions as much as possible. The entity of AMATS, being a federally required regional body hosted by the MOA, is bound by some federal requirements that may not hold true for city planning documents.	Staff recommends a rework of the comment response summary to not be so cumbersome.
164	Performance Measure General	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	Rabbit Creek Community Council	AMATS is getting ready to review the Public Participation Plan and this will be a good time for community members to outline their concerns and help identify the opportunities for improvement.	No recommended change.

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165	Performance Measure General	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.	Rabbit Creek Community Council	Diversifying the input received and building the list of engaged stakeholders will help AMATS understand what improvements the community as a whole truly supports.	Staff recommends changing performance measure 6C-1 to: "Number of new engaged community members in EJ areas of 60th or greater percentile"
166	Performance Measure Goal 5 General	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.	Rabbit Creek Community Council	Staff agrees that preserving Anchorage's natural setting is a high priority and have worked to reflect this sentiment in these performance measures.	No recommended change.
167	Performance Measure Goal 6	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.	Rabbit Creek Community Council	Comment adjudication, such as this, is part of every AMATS project and represents staff's responsiveness to public concerns. All comments are considered, but not all comments result in changes to projects or policies. Every effort is made to provide rationale for all comment responses.	No recommended change.
168	Performance Measure New 5E-1	New measures should be included here: 5E-1: Percent of residents within 15-minute walkable zones (see, Boulder, Co).	Rabbit Creek Community Council	The existing performance measures were selected based on the changes that AMATS can implement--the effectiveness of these measures depends on LUP decisions. Increasing the percentage of the population within a 15-minute walkable neighborhood is driven by land use policies that lead to compact, mixed-use development while also having supportive transportation infrastructure. Adding sidewalks/transit service to a low-density area doesn't automatically make it a 15-minute neighborhood in areas where the LUP doesn't allow a mix of uses or the minimum density to support regular transit service, etc., BUT it complements future LUP changes that make it possible. Given the reality of fiscal constraint, it makes the most fiscal sense to direct these types of investments to areas where they can have the greatest impact, and these are the areas where the LUP encourages more compact, mixed use growth.	No recommended change.
169	Performance Measure New 5E-2	5E-2: Percent of non-vehicular trips to schools and jobs (active transportation commuting).	Rabbit Creek Community Council	This can accomplished by looking at percentage of mode share.	Staff recommends adding new performance measures 3B-6 Percentage of trips taken by nonmotorized methods (e.g. walking, biking) and 3B-7 Percentage of trips taken by public transportation
170	Performance Measure New 6B-2	Safe at-grade crossings (6B-2);	Rabbit Creek Community Council	This is a design level detail that is outside the scope of the MTP. This will be addressed as part of the CSS process.	No recommended change.
171	Performance Measure New 6B-3	Noise abatement features (6B-3);	Rabbit Creek Community Council	This is a design level detail that is outside the scope of the MTP. This will be addressed as part of the CSS process.	No recommended change.
172	Performance Measure New 6B-4	Hardscape abatement features (6B-4).	Rabbit Creek Community Council	This is a design level detail that is outside the scope of the MTP. This will be addressed as part of the CSS process.	No recommended change.
173	Performance Measure New Measure 3E-3	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.	Rabbit Creek Community Council	Land use efficiency is not a measure that actions or policies of AMATS can adequately address.	No recommended change.
174	Performance Measure New Measure 3E-4	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).	Rabbit Creek Community Council	Induced Demand or the demand that results from the reduction in the cost of travel (monetary and opportunity) applies to all modes of travel and should not be applied to roadway expansion alone. While time is one of the factors, safety and comfort improvements, real or perceived, to non-motorized facilities and reliability and frequency improvements to transit could also induce demand for those modes of travel and would be a benefit. Guiding principles for the AMATS Congestion Management Process already suggest that preference be given to demand management strategies that eliminate or reduce travel, while leaving high-cost capacity serving single occupant vehicle travel as a last resort.	No recommended change.
175	Performance Measure New Measure 3E-4	Measure efficiency of land use: percent of population living in a 15-minute walkable neighborhood (new 3E4) (based on Boulder, CO)	Rabbit Creek Community Council	The existing performance measures were selected based on the changes that AMATS can implement--the effectiveness of these measures depends on LUP decisions. Increasing the percentage of the population within a 15-minute walkable neighborhood is driven by land use policies that lead to compact, mixed-use development while also having supportive transportation infrastructure. Adding sidewalks/transit service to a low-density area doesn't automatically make it a 15-minute neighborhood in areas where the LUP doesn't allow a mix of uses or the minimum density to support regular transit service, etc., BUT it complements future LUP changes that make it possible. Given the reality of fiscal constraint, it makes the most fiscal sense to direct these types of investments to areas where they can have the greatest impact, and these are the areas where the LUP encourages more compact, mixed use growth.	No recommended change.
176	Performance Measures - 2C-3 - 2C-6	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.	Rabbit Creek Community Council	Miles biked/walked are not metrics that are currently available. Additionally, a review of current literature does not indicate a methodology of modeling suitable of this purpose.	No recommended change.
177	Performance Measures - 1B	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.	Rabbit Creek Community Council	The intent of these metrics is to measure and reduce the miles of roadway within these areas.	No recommended change.

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178	Performance Measures - Goal 1	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.	Rabbit Creek Community Council	This would actually not "guard against unsustainable expansion of infrastructure". It would inhibit the benefits being brought about by new capital projects, such as non-motorized infrastructure. If we only focused on existing, a lot of places around AMATS area would never receive improvements. Part of what the MTP and AMATS has to do is balance the needs with the available funding.	No recommended change.
179	Performance Measures - Goal 3 General	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.	Rabbit Creek Community Council	This goal is focusing on the people and not the activities.	No recommended change.
180	Performance Measures - Goal 4 or 5 New	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).	Rabbit Creek Community Council	Staff is unable to discern a reasonable way to determine or measure this impact.	No recommended change.
181	Criteria - Goal 4	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.	Rabbit Creek Community Council	Freight traffic points are only one of many criteria that help to balance projects. Staff is looking at adding penalties to all criteria that can help address this issue.	Staff recommends increasing penalty amounts for existing penalties and adding new penalties to other criteria that don't have any, where practicable.
182	Performance Measure 3B-3 and 3A-5	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.	Rabbit Creek Community Council	The intent was to indicate an effort is being made to address these needs. Results are expected to be quantified through other measures.	No recommended change.
183	Performance Measure 3G-5	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.	Rabbit Creek Community Council	Commute times is not a function of the travel demand model and would require other tools to compare commuting patterns by vehicles, pedestrians, transit and bicyclists.	No recommended change.
184	Performance Measure 4B	Tourism • Add new measures for tourism-friendly enhancements under Objective 4B.	Rabbit Creek Community Council	Unnecessary for purposes of this goal.	No recommended change.
185	Performance Measure 4B	Add performance measures for aesthetics, wayfinding, or connections to tourism destinations.	Rabbit Creek Community Council	This is already covered under 3B-2.	No recommended change.
186	Performance Measure 4B-1	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.	Rabbit Creek Community Council	This goal is not included for purposes of taking credit or blame but is meant to observe changes in per capita spending. Length of visitor stay is not something AMATS can affect in a meaningful way. Staff was unable to find literature that tourist decide the length of stay based on the transportation system. Additionally staff is unsure if this information is tracked for all travelers.	No recommended change.
187	Criteria - Goal 3	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).	Rabbit Creek Community Council	The travel demand model is used on a regional level and is not configured to analyze 15 minute neighborhoods.	No recommended change.
188	Criteria - Goal 5	Award points for projects that build 15-minute walkable neighborhoods.	Rabbit Creek Community Council	Increasing the percentage of the population within a 15-minute walkable neighborhood is driven by land use policies that lead to compact, mixed-use development while also having supportive transportation infrastructure. Adding sidewalks/transit service to a low-density area doesn't automatically make it a 15-minute neighborhood in areas where the LUP doesn't allow a mix of uses or the minimum density to support regular transit service, etc., BUT it complements future LUP changes that make it possible. Given the reality of fiscal constraint, it makes the most fiscal sense to direct these types of investments to areas where they can have the greatest impact, and these are the areas where the LUP encourages more compact, mixed use growth.	No recommended change.
189	Criteria - Goal 5	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).	Rabbit Creek Community Council	Staff suggests keeping the criteria but including examples of treatments that help to protect natural areas such as the inclusion of bioswales and other natural stormwater treatments, undercrossings that can be used by wildlife, setbacks to protect wetlands and others.	Staff recommends adding examples of treatments to this criterion. Staff recommends revising language to focus on going beyond requirements to reduce environmental impacts.
190	Criteria - Goal 6	Instead of a negative 20 points for projects that heavily burden EJ areas, there should be a disqualification or "do not build" option.	Rabbit Creek Community Council	Having the -20 point helps to accomplish this "do not build" option. Staff recommends keeping the criteria limited to using points only so all projects are uniformly able to have a score.	No recommended change.
191	Criteria - Goal 6	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.	Rabbit Creek Community Council	Staff disagrees. This criterion needs to be looked at in the context of all the other criteria.	No recommended change.
192	Objectives 5D	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	Rabbit Creek Community Council	This is better addressed as part of the criteria. Staff is looking at increasing the penalty for impacts to sensitive natural areas.	Staff recommends increasing the penalty associated with the criterion Protects Sensitive Natural Area to -10.
193	Objectives 5D	• Acres of open space or park land impacted by noise, air pollution, and hydrological disruptions; and areas where wildlife movements are inhibited or blocked.	Rabbit Creek Community Council	This is better addressed as part of the criteria. Staff is looking at increasing the penalty for impacts to sensitive natural areas.	Staff recommends increasing the penalty associated with the criterion Protects Sensitive Natural Area to -10.
194	Performance Measure 1A	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.	Rabbit Creek Community Council	Staff concurs these performance measures can be expanded.	Staff recommends adding pavement conditions for the collector and arterial roads (non-NHS) to 1A. Staff recommends adding a pavement condition performance measure for non-motorized facilities within the AMATS area. More effort will be needed to look at the data needed for baseline and what is currently available.

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195	Performance Measure 2C-1 and 2C-2	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: <ul style="list-style-type: none"> Percent of roadways with speeds of 20 mph or higher that have separated pathways; 	Rabbit Creek Community Council	This is design level detail that won't be available at the MTP level of project description.	No recommended change.
196	Performance Measure 2C-1 and 2C-2	Percent of students residing in safe Walk-to-School zones;	Rabbit Creek Community Council	A breakdown of the population to show students in a household is not available and is hard to account for the school choice. Not all students go to the school in their neighborhood. This is accomplished through the safety Goal with the other criteria.	No recommended change.
197	Performance Measure 2C-1 and 2C-2	Percent of residents with a 15-minute safe walking radius to parks, schools, and commercial centers; and	Rabbit Creek Community Council	Increasing the percentage of the population within a 15-minute walkable neighborhood is driven by land use policies that lead to compact, mixed-use development while also having supportive transportation infrastructure. Adding sidewalks/transit service to a low-density area doesn't automatically make it a 15-minute neighborhood in areas where the LUP doesn't allow a mix of uses or the minimum density to support regular transit service, etc., BUT it complements future LUP changes that make it possible. Given the reality of fiscal constraint, it makes the most fiscal sense to direct these types of investments to areas where they can have the greatest impact, and these are the areas where the LUP encourages more compact, mixed use growth.	No recommended change.
198	General	Motorized projects are given extra points for the number of approved plans that call for the implementation of a certain project. This does not seem to be true for non-motorized projects. For example, the extension of the Glenn Hwy Bike Path has been in MTP, NMP, C-ER Comprehensive Plans, Bicycle Plans, Pedestrian Plan, the C-ER LRTP, and city Recreational Trails Plans since 1982. I do not see a mechanism for giving equitable scoring to a long-term regional project that has been waiting for decades. I suggest that additional points be given to complete streets and bike and ped projects that have been in multiple plans over the years, similar to motorized projects.	Will Taygan	The criteria doesn't give extra points for projects in an approved plan.	No recommended change.
199	General	In addition, I appreciate the Chugiak-Eagle River offset to give projects equal scoring when land-use plans/criteria are different between Anchorage and C-ER.	Will Taygan	Thank you for your comment.	No recommended change.