



METROPOLITAN PLANNING ORGANIZATION
4700 Elmore Road
Anchorage, Alaska 99507

Dear Seward Highway to Glenn Highway PEL Team,

AMATS staff recently attended a public meeting for the Seward Highway to Glenn Highway Connection (PEL) study and would like to provide feedback to the project team. Part of the responsibility of AMATS is to oversee the federal transportation planning process and it is through that view that these comments are being made.

The project team has been working very closely with AMATS staff on the PEL and acknowledged it links up with the AMATS Metropolitan Transportation Plan (MTP). As such we appreciate that the 2050 MTP projects for this area have been included as projects that are anticipated. Additionally, including an interim solution as an option is very positive.

There are some significant concerns that have been raised amongst AMATS staff that needs to be addressed as part of this project:

- 1) The overall feedback from AMATS staff is that the draft alternatives do not appear to address the concerns raised by the community nor solve many of the problems that have been raised as part of the plan development. In-fact, they appear to make the local connectivity worse. The impacts to equity areas, to the greenbelt, and to the communities within Anchorage are not outweighed by the benefits that these projects “might” accrue. Instead, the PEL should be focusing on fixing the transportation-related problems of the Fairview neighborhood while not destroying the area or other communities. Projects shown in the 2050 MTP, such as a complete street for Ingra/Gambell and a greenway for Hyder, should be analyzed for their impacts and benefits as an alternative.
- 2) The alternatives shown do not match up with the purpose and need. The alternatives show a focus on regional connectivity (building a highway facility) versus local connectivity and mobility. The 2050 MTP travel demand modeling shows that regional connectivity through 2050 is largely unchanged for vehicle delay without a highway connection. The System Performance Report for this project stated that, “A good part of the shift into LOS F [for PM Peak] is on the Glenn Highway in the northeastern corner of the Anchorage Bowl, and along the Glenn Highway and 5th Avenue within the project area. The LOS is not expected to rise to an unacceptable LOS within most of the study area.” (LOS stands for Level of Service, which is a measure of vehicle traffic congestion). Additionally, the System Performance Report for the project show that the change for vehicle hours of delay is almost non-existent aside from the Glenn Highway, which is also very low. There appears to be little or no justification for the construction of a highway connection at the expense of the community.
- 3) Building highways is not part of the current best practices within the transportation planning profession. Instead, the preferred, less impactful solutions come at lower costs to manage congestion, including improving active transportation facilities, increasing transit, Transportation Systems Management and Operations (TSMO), and Travel Demand Management (TDM).



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- 4) No funding is indicated for the alternatives that have been presented, not even a planning level cost estimate. AMATS is concerned about the potential affordability of any of the alternatives shown, especially in light of the limited State of Alaska budget, and the other large-scale projects underway by Alaska DOT&PF. Cost estimates should be developed so that the public can better understand the impacts of the transportation alternatives on the fiscal health of the region. Cost estimates will also help AMATS consider the alternatives and understand how they will impact the MTP. The MTP is currently fiscally constrained through 2050 and any new project(s) added will require other project(s) to be removed in order to maintain the federally required fiscal constraint for the plan. The interim alternative presented, which only includes projects in the MTP, would maintain the fiscal constraint.
- 5) The proposed alternatives will add a significant amount of infrastructure that will require long term pavement rehabilitation and winter maintenance. There is a significant backlog of deferred maintenance projects for the regional transportation system. Also, it has been difficult for municipal and State agencies to keep up with the demand for winter maintenance throughout the transportation system. Both of these issues are expected to be exacerbated by the alternatives shown.
- 6) The alternatives do not match up with the 2050 MTP goals to maintain existing infrastructure, improve safety and security, improve access and mobility options, promote a healthy environment, and advance equity. The alternatives also do not match up with the Federal-aid Highway Program performance goals of infrastructure condition and environmental sustainability.
- 7) Public transit does not appear to be included in the analysis as part of the alternatives. How has the Public Transportation Department been included in the project development? How was future transit accounted for as part of the alternatives development?
- 8) As a Metropolitan Planning Organization, AMATS is required to consider housing in our planning processes. From this perspective, it would be helpful to better understand how housing impacts will be mitigated across all alternatives, especially given the housing crisis we are currently facing as a community.
- 9) Are there innovative solutions considered, rather than building a highway connection, that could have the same impact to regional travel and better support local connectivity and livability than the alternatives presented, such as increasing transit, Transportation Systems Management and Operations (TSMO) strategies, and Travel Demand Management (TDM) strategies?

AMATS looks forward to continuing to work with the project team to develop a plan that addresses the questions and concerns raised by the community as well as the project purpose and need stated by Alaska DOT&PF. If you have any questions, please feel free to contact me.

Sincerely,

Aaron Jongenelen
AMATS Executive Director/MPO Coordinator



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Electronically Cc:
AMATS Policy Committee
AMATS Technical Advisory Committee