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Sent: Sunday, March 8, 2020 8:11 PM
To: AMATS Info
Subject: Comment on draft 2040 MTP

I would appreciate a reply so that I know you got these comments. Also, when transcribing or copy/pasting these comments into another document, **please retain the formatting**, as the emphases (bolding, underlines, yellow highlights, etc.) are essential.

Although the draft 2040 MTP says:

1. the four-year MTP revision cycle allows it to “incorporate **the latest data**” [1] ←*note: the numbers in brackets refer to the following 2040 MTP reference list*
2. that “**understanding future population growth is critical** to understand future transportation needs” [2],
3. that it “**exceeds federal guidelines** for predicting future travel” [4], and
4. that it has been developed using “**adopted** land-use forecasts” [6]...

...the MTP does not even hint at the fact that those forecasts are **NOT based on the latest data** and that they vastly over-estimate Anchorage area population growth relative to more recent forecasts.

The 2040 MTP should be revised to clearly state that:

- A. even though the goal is to use the latest data, the 2040 MTP is **NOT** based on the latest data,
- B. the fundamental basis of the 2040 MTP traffic and land-use estimates is the **2013 Alaska Department of Labor** (ADOL) statistics and projections[3], and that data does not include recent negative economic trends, for which there is no end in sight,
- C. in fact, the **2018** ADOL projections are the “latest data” (as of February 2020) and they show substantially less population growth than the **2013** ADOL projections: **5.5% vs 25%** for 2020 to 2045 (extrapolating the 2013 projections to 2045),
- D. economists expect the upcoming ADOL projections (to be published **April 2020**) to be as negative or more so than the **2018** ADOL projections,
- E. and because of the foregoing, **the 2040 MTP does not present a realistic view of future transportation needs.**

Also, Table 7-1 (short term) project 117 says the MCR “**2018** Cost Estimate” is \$193M. And Table 7-2 (long term) project 212 MCR “**2018** Cost Estimate” is \$250M. **Cost estimates for all projects associated with the MCR should be updated with the upper bound cost estimates from the current MCR PEL project; even though it is not final yet, it represents the “latest data.”**

2040 MTP reference list (cited above via square brackets):

1. Chapter 1 page 7 says “The MTP is **generally updated every 4 years**, allowing AMATS to **incorporate the latest data**, identify changes affecting travel demand and traffic patterns, and adjust policies and projects based on changing conditions. The MTP is required to have at least a **20-year planning horizon.**”
2. The chapter 5 cover page says “Understanding the **future population growth** and land use changes is **critical** to understand and identify our future transportation needs. Population, employment, and land use are the basis for **estimated** (future) travel demand...”
3. Chapter 5 page 2 says “The base year **2013** was the most recent year for which the **model data has been validated.**”

4. Chapter 5 page 4 says the travel/demand model was “validated against **2013 traffic count** and transit boarding data and the latest 2040 land use distribution. **It meets or exceeds federal guidelines for predicting future travel.**” (Note that reference 5 says the 2040 Land Use Plan was adopted in **September 2017**; it is also based on **2013** population data.)
5. Chapter 5 page 6 says “The locations of future household and employment growth in the region are based on the Anchorage 2020: Anchorage Bowl Comprehensive Plan (adopted February **2001**), the **Anchorage 2040 Land Use Plan (adopted September 2017)**, and the Chugiak-Eagle River Comprehensive Plan Update (adopted December **2006**).”
6. Chapter 5 page 14 says “The alternatives development process began with a deficiencies analysis to understand current transportation system performance and project future transportation needs based on **adopted land-use forecasts.**”