



**FRIENDS OF
THE
ANCHORAGE
COASTAL
WILDLIFE
REFUGE (FAR)**

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Subject: FAR comments on AMATS 2040 MTP Public Review Draft

Dear Craig Lyon and Whom it May Concern:

I write on behalf of Friends of the Anchorage Coastal Wildlife Refuge (FAR) with comments regarding the AMATS 2040 MTP Public Review Draft dated December 2019.

FAR is a 501(c)(3) nonprofit organization of citizens and professionals whose mission is to preserve the integrity and biological diversity of the Anchorage Coastal Wildlife Refuge. This easily damaged subarctic saltmarsh ecosystem supports an unusual diversity of plants, birds, mammals, fish and invertebrates and is of continental conservation significance. The proximity of the refuge to Alaska's largest city makes it important for public education and enjoyment but also makes it highly vulnerable.

Our primary concern is preserving the refuge and its natural resources. A multi-use trail built through the refuge would significantly affect wildlife and other refuge resources. Much of this information can be found in the extensive documentation of potential environmental impacts collected during previous planning efforts for the South Coastal Trail Extension. However, we also have procedural and funding issues with the AMATS 2040 plan.

Procedural concerns

AMATS 2040 purports to be a transportation planning document, but in one very noticeable slip, it attempts to facilitate construction of a purely recreational trail.

For example, AMATS 2040 contains only 13 references to "recreation" or "recreational" (highlighted in red below) in the entire document.

- 2040 Goals and Objectives, Goal 3 Improve Travel Conditions, Objective 3F (Chapter 3, p. 5):

Improve accessibility to major educational, **recreation**, employment, commercial, health care, and other public **facilities**.

- System Overview (Chapter 4, p. 3):

The transportation system also supports diverse land uses needed to meet the residential, employment, commercial, service, and **recreational needs** of the community.

- Non-Motorized Transportation (Chapter 4, p. 29):

Based on the AMATS regional household travel survey for all trips, including running errands and **recreational travel**, bicycling is used for 1.5% of all trips and walking is used for 8.2% of trips.

- Table 5-5 2040 MTP Initial Screening Criteria, Footnote 5 (Chapter 5, p. 23):

Level of Community Impacts consider factors such as impacts to educational facilities, negative visual impacts, impacts to **recreational facilities**, neighborhood division, and impacts to livability factors.

- Table 5-5 2040 MTP Initial Screening Criteria, Footnote 12 (Chapter 5, p. 23):

Economic benefits consider factors that encourage economic development, redevelopment, and/or freight mobility through improved access and transportation opportunities; addresses impacts on urban areas, freight corridors, **recreational** or educational **opportunities**, and tourism activity. It benefits economic development projects.

- Operations and Maintenance, Roads & Non-Motorized (Chapter 6, p 13):

The MOA **Parks and Recreation Department** estimated cost to maintain a trail that is not adjacent to a roadway at \$2,600 per mile.

This additional cost is expected to be absorbed as part of the annual budget for the MOA **Parks and Recreation Department** over time.

- Objective 3F (Chapter 8, p. 8):

Improve accessibility to major education, **recreation**, employment, commercial, health care, and other public **facilities**.

3F-2 Continue to work with MOA Planning to preserve existing platted easements for trails and establish new platted easements in subdivisions for access to schools, regional parks, **recreational facilities**, employment centers, and institutional and governmental facilities.

- The following federal, state, tribal, and local resource agencies were contacted (Chapter 8, p. 18):

MOA **Parks and Recreation**

- Glossary (Appendix A, p. 14)

Trails and **Recreational Access** for Alaska (TRAAK): A program and component of Governor Tony Knowles' Transportation Initiative (June 1995) established to improve access and **recreational opportunities** in the state. Administered by DOT&PF, TRAAK addresses trails, scenic highways, **recreational access points**, and interpretive facilities.

Although trails are considered “recreational facilities” in other municipal documents, all but two of these quotes appear to refer to either a) access/transportation to various facilities or b) the municipality’s Parks and Recreation Department. Two quotes refer to “recreational opportunities”; however, in both of those instances the reference is subsidiary to the main point. In other words, in Table 5-5 “recreational opportunities” is mentioned in the context of addressing impacts from economic development. And in the glossary the term “recreational opportunities” is simply part of the definition of the TRAAK program.

On the other hand, the words “transit” and “transportation” are used over 400 times.

To put it simply, AMATS 2040 is a transportation plan. Recreational use of roads and trails built for transportation purposes is a laudatory but certainly secondary use that doesn’t appear to factor into the goals and objectives of this plan. However, one trail in the plan would be primarily a recreational trail. It is unlikely that many people would use it for commuting or accessing other facilities that were more quickly and easily reached by more direct, less exposed routes.

This analysis and discussion is a prelude to our primary concern. Consistent with the stated goals and objectives of AMATS 2040, most of the short-term and long-term non-motorized projects listed in Tables 7-4 and 7-5 are on or near existing roads. A few projects would enhance or provide short connections between existing multi-use trails used by commuters and for other transportation-related activities.

However, Table 7-6 includes a project (MTP #601 – Coastal Trail South Extension – Jodhpur Street to Potter Marsh) that is unlike any other in AMATS 2040. It would be a long trail built almost exclusively for recreational purposes.

According to AMATS 2040, the Coastal Trail South Extension is included in Table 7-6 as an “illustrative project” (Chapter 7, p. 34). This term is explained as follows:

Due to anticipated funding constraints, some non-motorized projects that had merit are not anticipated to be able to be completed by 2040 with the projected revenue. These projects are included as illustrative projects and are listed in Table 7-6. These projects don’t fit within the fiscal constraints of the plan, but could move into the funded plan at a later date if additional funding is identified.

In fact, multiple iterations of the Coastal Trail South Extension were considered two decades ago. The “preferred” alternative was found to be unacceptable by the Federal Highway Administration because the Department of Transportation requested the No Build or No Action Alternative. The Anchorage Assembly voted to remove the Coastal Trail project from the Long Range Transportation Plan (LRTP) and the Metropolitan Planning Organization (MPO), Anchorage Metropolitan Area Transportation Solutions (AMATS) Policy Committee, which voted to delete all references to the South Coastal Trail from the LRTP. [ROD SECT FHWA 2006.3.30] Thus, contrary to the quote above, the South Extension does not have “merit” and should be deleted from AMATS 2040. There is no good reason to include a project in long-range planning after it has gone through extensive public, state, and federal review and determined to be unacceptable.

Particularly troublesome is the suggestion that the South Extension “could move into the funded plan at a later date.” This implies that no additional public input would be needed to fund and execute the “illustrative” trail project.

Yet another procedural concern is the relative ranking of the various projects using the MTP prioritization criteria in Table 5-10. I have been unable to find the project scores or ranking anywhere in AMATS 2040. It’s hard to believe that the Coastal Trail South Extension had a high score. The best scores I can come up with for MTP #601 in each of the five criteria are as follows: Project Readiness (“no work started” = 0), Project Need (“N/A” = 0 or “completes a gap in the existing network” = 1), Timing of Need (“can wait until beyond 2040” = -2), Potential for New [non-recreational] Trips (“N/A” = -2 or 0), and Obstacles to Construction (“unlikely to be overcome” = -2 or “requires significant effort to resolve” = 0). Adding these up gives a total score ranging from -1 to -6. I wouldn’t call that a high-priority project.

The presence of the Coastal Trail South Extension in this plan is unwarranted and unjustified according to the stated goals, objectives and prioritization criteria of AMATS 2040.

Cost concerns

In addition to environmental and procedural reasons, there are several very good economic reasons to delete the South Extension from AMATS 2040. Table 7-6 estimates that the 2018 cost of the project would be \$35.5 million. This is a ludicrously low estimate for a multi-use trail that would be built through wetlands, over tideflats, and up and down an eroding and earthquake-prone coastal bluff. The planning, design, environmental studies, polls, and public involvement alone for the previous, unsuccessful attempt to build the South Extension cost millions of dollars.

Common sense suggests that the actual cost of this project would be much higher. Two examples should suffice. MTP #411 would extend the Coastal Trail from Kincaid Park to Jodhpur Street. This 1/3-mile extension would be built on an existing trail in an upland area. MTP #412 would widen the existing Coastal Trail slightly between Earthquake Park and Westchester Lagoon, a distance of about 2.4 miles. MTP #411 is estimated to cost \$3.1 million. MTP #412 is estimated to cost \$2.6 million. The South Extension would be 13 miles long. Applying the cost estimate of MTP #411, the South Extension (which is almost 40 times longer) would cost an estimated \$121 million, but that doesn’t factor in the wetlands, tideflats and eroding bluffs – not to mention distance from roads – which would surely add to the cost.

Distance from roads is a cost multiplier, not only in construction but for trail maintenance. For instance, according to this document, the estimated annual cost to maintain a trail that is not adjacent to a roadway (essentially the entire South Coastal Extension) is \$2,600 per mile (Chapter 6, p. 13), or approximately \$34,000/year for the 13-mile-long trail.

It’s not out of the question that the 13-mile South Coastal Extension would cost four times as much as the estimate provided in AMATS 2040. You might want to ask some engineers to double-check that estimate. You might also double-check that they aren’t the same engineers who have been advocating for this trail for two decades.

Conclusion

For all of the reasons discussed above – environmental, procedural, and economic – MTP #601 should be deleted from AMATS 2040. Thank you for giving us an opportunity to comment on the plan.

Sincerely,

Rick Sinnott

FAR Secretary

cc: Barbara Carlson

FAR President and Executive Director

Joe Meehan, ADFG Coordinator Lands & Refuges Program

David Battle, ADFG Area 2 Biologist

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