

A definition of "Urban and Rural" should be stated so communities can be sure to use the right evaluation criteria.

Urban and Rural Projects Criteria				
	Scoring Criteria			
Standards	(5)	(3)	(0)	(-3)
1. Economic benefits if not new mode or facility. Weighting: 1	Endorsed in an economic development plan by a public entity and provides new direct access to a community resource.	Identified in an economic development plan by a public entity; or provides new or improved access to an important community resource.	Supports minimal, speculative, or temporary economic opportunities; or benefits or provides non-crucial benefit to existing economic activity.	N/A
<i>Economic benefits analysis in 1 shall not consider benefits due to project construction.</i>				
2. Health and quality of life (for example air and water quality, neighborhood continuity, access to basic necessities) Weighting: 2	This project provides a measureable significant contribution to improved health or quality of life; or reduces or removes a significant existing negative factor.	This project provides a moderate contribution to improved health or quality of life; or reduces or removes an existing negative factor.	Project will have no effect either positive or negative on quality of life issues.	This project provides a significant degradation to health or quality of life.

Any degradation should be negatively scored, not just "significant" degradation

This hurts communities that may not have a dedicated stand-alone ED plan. Does the economic development section of a comp plan count?

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Urban and Rural Projects Criteria				
Scoring Criteria				
Standards	(5)	(3)	(0)	(-3)
<p>3. Safety. Meets goals or strategies listed in the Alaska Strategic Highway Safety Plan (SHSP).</p> <p>5 Year Safety Historical Concentrations</p> <p style="text-align: right;">Weighting: 5</p>	<p>Proposes mitigation which is recognized in practice to address safety issues for a route that qualifies based on:</p> <p>A) severe crashes on a segment or intersection with a 5-year crash rate exceeding the statewide average; B) a long term pattern of fatal or major (incapacitating) injury accidents; C) a documented high accident potential or risk between a major non-motorized use facility and vehicular traffic; or D) HSIP* costs/mile of project length within top 15% concentration of all crash sites based on HSIP costs.</p>	<p>Proposes mitigation which is recognized in practice to address safety issues for a route that qualifies based on:</p> <p>A) A minor injury or property damage crashes on a segment or intersection with a 5-year crash rate exceeding the statewide average; or B) Anecdotal evidence of traffic conflicts between non-motorized users and vehicular traffic; or C) HSIP costs/mile of project length within top 25% of concentration of all crash sites based on HSIP costs.</p>	<p>No mitigation is demonstrated to address a crash problem or potential in other categories:</p> <p>A) crashes on the project's segments or intersections have a crash rate below the statewide average. B) Historical crash patterns identified are less than 3 or more crashes per year. C) No demonstrated traffic conflicts between non-motorized users and vehicular traffic. D) HSIP costs/mile of project length is above average concentration of all crash sites based on HSIP costs.</p>	<p>Proposes features which are recognized in practice to worsen highway safety such as a project that:</p> <p>A) would be contrary to a strategy of the SHSP in a significant manner; or B) Proposes other work that is viewed as contrary to producing a safer roadway environment for motorized or non-motorized users.</p>
<p><i>Minimum latest available 10 year record. When using anecdotal crash information from first hand (EMS, Fire, Police, M&O - on-scene responsibility) = maximum score is 4 points. When using anecdotal safety information from second-hand sources (not on-scene responsibility) or data not recognized in practice = maximum score 2 points.</i></p> <p><i>*Highway Safety Improvement Program (HSIP)</i></p>				
<p>4. Improves intermodal transportation or lessens redundant facilities.</p> <p style="text-align: right;">Weighting: 2</p>	<p>Would clearly reduce the need for capital investment or significantly reduce operating costs in another mode or on an adjacent facility; or significantly improves the connection between modes for travelers or freight.</p>	<p>May reduce the need for capital investments and /or result in a reduction in operating costs in another mode or on an adjacent facility; or would moderately improve the connection between modes for travelers or freight.</p>	<p>Does not impact other mode or adjacent facility requirements.</p>	<p>Will increase demand on another mode or facility requiring additional capital expenditure; or a new increase in operating cost.</p>



This seems stringent for
 PJs not on the NHS & not
 funded by HSIP

Given the fiscal climate, communities should be given fewer points if their match is coming from any state-funded source.

Urban and Rural Projects Criteria				
Standards	Scoring Criteria			
	(5)	(3)	(0)	(-3)
5. Local, other agency or user contribution to fund capital costs. Weighting: 5	Contribution of cash matching funds : .2 pt per each 1% of project cost in excess of the required federal aid match.		Contribution covers no capital costs; contributes nothing.	N/A
<i>Only contributions that exceed the required match contribution shall be considered. An official DOT cost estimate is required. DOT sponsored projects will not exceed the minimum match. See official match policy.</i>				
6a. Local, other agency or user contribution to fund M&O costs. (For non-DOT&PF sponsored projects.) Weighting: 5	Sponsor will assume ownership and management responsibility if currently a DOT&PF facility; or sponsor will assume ownership of another DOT&PF facility of similar M&O cost.	Continued sponsor ownership and management responsibility of locally owned facility and community currently assumes management responsibility for all roads functionally classed minor collector and below (3pts) Or responsibility for all roads functionally classed Local (2pts)	Sponsor assumes ownership and management responsibility of proposed or existing locally owned facility=0pt	Project would increase M&O costs significantly.
<i>Sponsor commitment must be in writing and passed by the governing body of the community or tribe before points will be assigned.</i>				
6b. Departmental M&O costs and priority (For DOT&PF sponsored projects.) Weighting: 0 or 5	Significant M&O priority.	Moderate M&O priority.	Not an M&O priority; little effect on M&O costs.	Not an M&O priority; would increase M&O costs significantly.

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Urban and Rural Projects Criteria				
	Scoring Criteria			
Standards	(5)	(3)	(0)	(-3)
7. Public support <i>Does this include annual CIP lists adopted by municipalities?</i> Weighting: 3	Project has a resolution of support from the local elected body or a public record of support for a project located in an area not represented by a locally elected body AND is identified as a high priority project in state, tribal, or local plans.	Project has a resolution of support from local elected body; and supported in official state, tribal, or local plans or; There is a public record of support if project is located in unincorporated community in unorganized borough	Project has resolution of support from local elected body.	No resolution of support from Local elected body Or There is no public record of support if project is located in unincorporated community in unorganized borough
<i>Resolution is only required in areas/communities represented by locally elected body.</i>				
8. Environmental approval readiness? Weighting: 2	Environmental approval complete; or Environmental approval likely with a categorical exclusion document.	Environmental approval likely with Assessment	or Environmental Impact Statement.	Environmental approval unlikely.
<i>Environmental documentation must follow FHWA guidelines as explained in explained in federal regulations.</i>				
9. System Reliability. or deficient width/grade/alignment (w/g/a). <i>Can this be "or"? Many rural communities are more significantly impacted by reliability than congestion.</i> Weighting: 4	Primarily an Asset Management Rehabilitation project on a state route; or a state route with significantly deficient w/g/a relative to standards impacting system reliability and congestion reduction. 4 points if not state owned.	A portion of the project rehabilitates subgrade, appurtenances or other infrastructure such as sidewalks, etc.; or moderately deficient w/g/a relative to standards.	Primarily major reconstruction; addresses long-range rehabilitation and No w/g/a deficiencies.	N/A
<i>For projects which address a situation where there is a traffic demand that is significantly (or moderately) in excess of the number of existing lanes will be considered to have significantly (or moderately) deficient w/g/a relative to standards.</i>				

The "and" gives preference to Anc, FBKs, Mat-Su, + Juneau. No one else has real congestion on a consistent basis. System reliability in terms of interruption caused by w/g/a deficiencies is much more common for AK communities.

Urban and Rural Projects Criteria				
Standards	Scoring Criteria			
	(5)	(3)	(0)	(-3)
10. Cost Effectiveness using Cost, length, AADT evaluation. Divide project cost (in thousands) by length (miles) and further divide result by Average Annual Daily Traffic. Weighting: 5	$\$0 - \$1.50 = 5$ $\$1.50 - \$3.00 = 4$	$\$3.00 - \$4.50 = 3$ $\$4.50 - \$6.00 = 2$ $\$6.00 - 8.00 = 1$	$\$8.00 - \$10.00 = 0$	$\$10.00 - \$20.00 = -1$ $\$20.00 - 40.00 = -2$ $>\$40.00 = -3$
<i>Stand alone bridge projects use assumed length of 1 mile; stand alone intersection projects use assumed length of 1/2 mile.</i>				
11. Deficient bridges? Weighting: (4) ⁵	Bridge needs to be replaced. At the end of service life and structurally deficient. Two or more bridge ratings are deficient (4 or less).	Structurally deficient. At least one bridge rating is deficient (4 or less).	+1 point if project addresses a functionally obsolete bridge.	N/A
12. Functional class. Weighting: (5) ³	Minor Arterial = 5 +1 point if Principle Arterial, NHPP, or Interstate +1 point if located on designated freight route.	Major Collector =3 Minor Collector =2 DOT owns a lot of roads that it shouldn't that have lower functional classification. FC that's low shouldn't hurt communities willing to take ownership. Also, NHPP routes shouldn't be included in	Local Roads/Streets or Unclassified	CIP program because they don't need to be scored.
13. Other factors not specified. Weighting: 2	Project exhibits significant innovation creativity or unique benefits not otherwise rated.	Project exhibits moderate innovation creativity or unique benefits not otherwise noted.	Project exhibits no innovation creativity or unique benefits not otherwise rated.	CIP program because they don't need to be scored.

alone

Definition of remote

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STIP Project Scoring Criteria Draft

Remote Projects Criteria Scoring Criteria				
Standards	(5)	(3)	(0)	(-3)
1. Economic benefits <i>Same comment as U+R criteria</i> Weighting: 2	Endorsed in an economic development plan by a public entity and provides new direct access to a community resource.	Identified in an economic development plan by a public entity; or provides new or improved access to an important community resource.	Supports minimal, speculative, or temporary economic opportunities; or benefits or provides non-crucial benefit to existing economic activity.	N/A
<i>Economic benefits analysis in 1 shall not consider benefits due to project construction.</i>				
2. Health and quality of life (for example Air and water quality, neighborhood continuity, access to basic necessities) Weighting: 4	This project provides a significant contribution to improved health or quality of life; or reduces or removes a significant existing negative factor.	This project provides a moderate contribution to improved health or quality of life; or reduces or removes an existing negative factor.	Project will have no effect either positive or negative on quality of life issues.	This project provides a significant degradation to health or quality of life.
<i>Examples: Access to basic sanitation = 5; dust control = 4; access to medical facility = 3.</i>				

Remote Projects Criteria				
Scoring Criteria				
Standards	(5)	(3)	(0)	(-3)
<p>3. Safety. Meets goals or strategies listed in the Alaska Strategic Highway Safety Plan (SHSP).</p> <p>5 Year Safety Historical Concentrations</p> <p><i>See Safety comment for U+R Criteria</i></p> <p>Weighting: 5</p>	<p>Proposes mitigation which is recognized in practice to address safety issues for a route that qualifies based on:</p> <p>A) severe crashes on a segment or intersection with a 5-year crash rate exceeding the statewide average; B) a long term pattern of fatal or major (incapacitating) injury accidents; C) a documented high accident potential or risk between a major non-motorized use facility and vehicular traffic; or D) HSIP* costs/mile of project length within top 15% concentration of all crash sites based on HSIP costs.</p>	<p>Proposes mitigation which is recognized in practice to address safety issues for a route that qualifies based on:</p> <p>A) A minor injury or property damage crashes on a segment or intersection with a 5-year crash rate exceeding the statewide average; B) Anecdotal evidence of traffic conflicts between non-motorized users and vehicular traffic, or C) HSIP costs/mile of project length within top 25% of concentration of all crash sites based on HSIP costs.</p>	<p>No mitigation is demonstrated to address a crash problem or potential in other categories:</p> <p>A) crashes on the project's segments or intersections have a crash rate below the statewide average. B) Historical crash patterns identified are less than 3 or more crashes per year. C) No demonstrated traffic conflicts between non-motorized users and vehicular traffic. D) HSIP costs/mile of project length is above average concentration of all crash sites based on HSIP costs.</p>	<p>Proposes features which are recognized in practice to worsen highway safety such as a project that:</p> <p>A) would be contrary to a strategy of the SHSP in a significant manner; or B) Proposes other work that is viewed as contrary to producing a safer roadway environment for motorized or non-motorized users.</p>
<p><i>Minimum latest available 10 year record. When using anecdotal crash information from first hand (EMS, Fire, Police, M&O - on-scene responsibility) = maximum score is 4 points. When using anecdotal safety information from second-hand sources (not on-scene responsibility) or data not recognized in practice = maximum score 2 points.</i></p> <p><i>*Highway Safety Improvement Program (HSIP)</i></p>				

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Remote Projects Criteria				
Scoring Criteria				
Standards	(5)	(3)	(0)	(-3)
4. Improves intermodal transportation or lessens redundant facilities. Weighting: 2	Would clearly reduce the need for capital investment or significantly reduce operating costs in another mode or on an adjacent facility; or significantly improves the connection between modes for travelers or freight.	May reduce the need for capital investments and /or result in a reduction in operating costs in another mode or on an adjacent facility; or would moderately improve the connection between modes for travelers or freight.	Does not impact other mode or adjacent facility requirements.	Will increase demand on another mode or facility requiring additional capital expenditure; or a new increase in operating cost
5. Local, other agency or user contribution to fund capital costs. Weighting: 5	Contribution of cash matching funds: .2 pt per each 1% of project cost in excess of the required federal aid match. <i>See funding comments for UAR Criteria</i>	Contribution covers no capital costs; contributes nothing.	Contribution covers no capital costs; contributes nothing.	N/A
<i>Only contributions that exceed the required match contribution shall be considered. An official DOT cost estimate is required. DOT sponsored projects will not exceed the minimum match. See official match policy.</i>				

Remote Projects Criteria				
Scoring Criteria				
Standards	(5)	(3)	(0)	(-3)
<p>6a. Local, other agency or user contribution to fund M&O costs. (For non-DOT&PF sponsored projects.)</p> <p>0 or 5</p> <p>Weighting: 5</p>	<p>Sponsor will assume ownership and management responsibility if currently a DOT&PF facility; or sponsor will assume ownership of another DOT&PF facility of similar M&O cost.</p>	<p>Continued sponsor ownership and management responsibility of locally owned facility and community currently assumes management responsibility for all roads functionally classed minor collector and below (3pts) Or responsibility for all roads functionally classed Local (2pts)</p>	<p>Sponsor assumes ownership and management responsibility of proposed or existing locally owned facility=0pt</p>	<p>Project would increase M&O costs significantly.</p>
<p><i>Commitment must be in writing and passed by the governing body of the community or tribe before points will be assigned</i></p>				
<p>6b. Departmental M&O costs and priority (For DOT&PF sponsored projects.) Weighting: 0 or 5</p>	<p>Significant M&O priority.</p>	<p>Moderate M&O priority</p>	<p>Not an M&O priority; little effect on M&O costs.</p>	<p>Not an M&O priority; would increase M&O costs significantly.</p>

When are periods being used? Consistency.

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Remote Projects Criteria				
Scoring Criteria				
Standards	(5)	(3)	(0)	(-3)
7. Public support. Weighting: 3	Project has a resolution of support from the local elected body or a public record of support for a project located in an area not represented by a locally elected body and is identified as a high priority project in state, tribal, or local plans. <i>CIP list?</i>	Project has a resolution of support from local elected body a public record of support for a project located in an area not represented by a locally elected body and nominally supported in official state, tribal, or local plans.	Project has resolution of support from local elected body or there is a public record of support if project is located in unincorporated community in unorganized borough.	No resolution of support from Local elected body and no public record of support if project is located in unincorporated community in unorganized borough
<i>Resolution is only required in areas/communities represented by locally elected body.</i>				
8. Environmental approval readiness Weighting: 2	Environmental approval complete; or Environmental approval likely with a categorical exclusion document.	Environmental approval likely with Assessment	or Environmental Impact Statement.	Environmental approval unlikely.
<i>Environmental documentation must follow FHWA guidelines as explained in explained in federal regulations.</i>				
9. Will project provide new and/or improved access to the noted uses: ferry terminals, airports, subsistence sites, or river/ocean access? Weighting: 2	New access to two or more uses = 5.	New access to one = 3; Improved access to two or more = 2; Improved access to one of listed uses = 1.	None of uses listed.	N/A

This is also still very important to many communities, even if they're not remote. Maybe this criteria could be added to U+R? Or maybe it could be combined with intermodal transportation connections?

Remote Projects Criteria				
Scoring Criteria				
Standards	(5)	(3)	(0)	(-3)
10. System preservation and Bridges 5 Weighting: 4	Major purpose of project is to extend the life of existing facility by 10 or more years. Bridge needs to be replaced. At the end of service life and structurally deficient. Two or more bridge ratings are deficient (4 or less).	Secondary purpose of project is to extend life of existing facility by 10 or more years. Structurally deficient. At least one bridge rating is deficient (4 or less).	Preservation is not significant purpose of the project. +1 point if project addresses a functionally obsolete bridge.	N/A
11. Is this a joint project coordinated with ADEC, BIA, ANTHC, or similar state or federal agency? Weighting: 4	N/A	Yes	No.	N/A
Must provide written letter or MOU showing commitment and coordination.				
12. Cost Effectiveness: Total project cost/persons whom facility provides essential services & benefits described in Criteria 1,2,3,4 or 9 Weighting: 5	5pts – If per capita cost is \$5,000 or less 4pts – If per capita cost is \$5,001-\$7,500	3pts – If per capita cost is \$7,501 - \$10,000 2pts – If per capita cost \$10,001 - \$12,500 1pt – If per capita cost is \$12,501 - \$15,000	0pt – If per capita cost is \$15,001 - \$20,000	-1pt – If per capita cost is \$20,001 - \$25,000 -2pts – If per capita cost is \$25,001 - \$30,000 -3pts – If per capita cost is \$30,001 or more
13. Other factors not specified. Weighting: 2	Project exhibits significant innovation creativity or unique benefits not otherwise rated.	Project exhibits moderate innovation creativity or unique benefits not otherwise noted.	Project exhibits no innovation creativity or unique benefits not otherwise rated.	

Why not same note about stand alone bridge & intersection projects?



KETCHIKAN GATEWAY BOROUGH

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• telephone: (907) 228-6625 • fax (907) 228-6684

Office of the Borough Manager

June 21, 2017

Alaska Department of Transportation & Public Facilities

Division of Program Development

ATTN: STIP

PO Box 112500

Juneau, Alaska 99811-2500

RE: Draft 2018-2021 CTP PEB Criteria

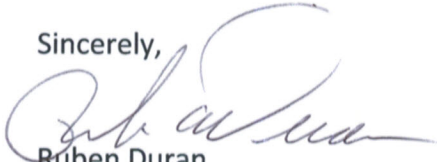
To whom it may concern:

On June 7, 2017, notice was received by the Planning Department that the Department of Transportation and Public Facilities (ADOT&PF) was soliciting review and comments regarding the proposed scoring criteria for the Community Transportation Program (CTP) Project Evaluation Board (PEB) relating to the Statewide Transportation Improvement Program (STIP). Upon further review of the current scoring criteria compared to the proposed criteria, I am submitting the following comments on behalf of the Ketchikan Gateway Borough:

1. The draft criteria indicates that a higher scoring will be provided to matching fund contributions to projects. This criterion does not address Boroughs without areawide road powers and does not include in-kind contributions such as land donations and staff support.
2. The draft criteria indicates that a higher scoring will be provided to local government contributions to fund maintenance and operation costs. This criterion also includes local ownership and management of the facility, which negatively affects Boroughs without areawide road powers.
3. A public support criterion provides more points for projects that have a resolution identifying the project as a high priority in a state, tribal, or local plan. This criterion gives zero points to a project supported by a resolution alone and negative three points to those projects not supported by a resolution. The Borough is concerned that this criterion negatively affects remote and rural communities where there is insufficient funds for local studies. The Borough believes that points should be allotted to local jurisdictions that submit a resolution in support of a project.
4. The joint criterion under Remote Areas should be included for the Urban and Rural areas because many of the road projects include joint projects related to utilities with assistance from other agencies.

Please consider our comments and revise the criteria to be more considerate to those Boroughs that do not have areawide road powers and to smaller communities that lack sufficient funds for local transportation plans.

Sincerely,

A handwritten signature in black ink, appearing to read "Ruben Duran". The signature is fluid and cursive, with a large initial "R" and "D".

Ruben Duran

Borough Manager

RE: 2018-2021 STIP Project Scoring Criteria Review Draft

Below are some comments on and suggestions for the CTP Project Evaluation Criteria, June 2017. These comments are based on the Urban and Rural Projects Criteria, but in some circumstances could also apply to the Remote Projects Criteria.

On some items, such as environmental analysis and cost estimates, I suggest the use of consultants. Full disclosure: I am one. I know that my local Region is having a tough time filling positions, and that fewer staff are being asked to handle a larger workload.

1. Economic Benefits

I'd suggest modifying the criteria to de-incentivize new lane miles or infrastructure, which would create an ongoing burden for M&O. I'd suggest that the State provide 5 points to a project that improves existing infrastructure for access to a resource, and provide 3 points for new infrastructure.

2. Health and Quality of Life

I'd suggest dividing this into two criteria to allow for less qualitative criteria.

For five points under "Health," I'd suggest we tighten the criteria:

- Co-located with a utility transmission corridor (for instance, a water or electrical transmission line, thus reducing maintenance and/or construction costs for a utility).
- Direct, singular access to a primary utility facility (for example, a dam, sewer treatment facility, water treatment facility).
- Direct, singular access to a hospital.
- Direct, singular access to an existing landfill, a proposed landfill with ADEC approval, or sewage lagoon.

For three points, I'd suggest:

- Access within two miles of:
 - A primary utility facility.
 - A hospital.
 - An existing landfill, a proposed landfill with ADEC approval, or sewage lagoon

My emphasis on utilities lies with the importance of clean water and sanitation in public health. Reliable electrical access is critical for people with certain sorts of treatment (such as some on oxygen), but I can also see moving that to "Quality of Life." Note that ADEC's Solid Waste Program can tell ADOT&PF if a community's chosen landfill site has been approved.

Under "Quality of Life," I'd suggest five points for:

- Direct, singular access to:
 - A school
 - A drug treatment facility
 - A health rehabilitation center or long-term care facility

- Subsistence resources

For three points, a criteria of “Access within two miles of...” and the same bullets could work.

I’d propose negative points for proximity to sacred sites. This may be a tricky one to measure, as some communities are very secretive about their sacred sites to minimize vandalism and theft. As an opening position, I’d suggest negative 0.01 points for every ten feet closer than 500 feet between the proposed project boundary and the closest sacred resource. For instance, if a proposed project was 450 feet from a sacred site, it would get -0.05. If the proposed project was 50 feet from a sacred site, it would get -4.5. Perhaps to encourage up-front examination of this issue, ADOT&PF could make the points adjustable retroactively. For instance, if a project had no negative points, but then was found to be within 50 feet of a sacred site, the -4.5 points would be applied to its score, and its ranking in the funding hierarchy would be appropriately modified.

3. Safety

I’d suggest reducing the requirement for a 10 year safety record to five years, since the criterion specifies five year historical concentrations.

I’d recommend that the Alaska Trauma Registry Data provided by the Alaska Department of Health and Human Services be recognized as “official data” for rural communities with no local law enforcement. It is my understanding that “official” crash data is based on law enforcement reports. To require official crash data is to establish a policy that puts rural communities at a disadvantage. The Alaska Trauma Registry is divided by region, and divides injury cause into motor vehicle occupant, airplane, ATV, bicycle, pedestrian, snow machine, and water transport without drowning. I’d suggest if the project addresses one of these factors, and the regional average is higher than the state average, it would be worthy of 5 points. Below is a table from the Southwest Alaska Transportation Plan Update that used this data.

Table 5: Fatal Injury Accidents Reported for Southwest Alaska in the Alaska Trauma Registry Data, 2006-2010

Year		Injury Cause							Total
		Motor Vehicle Traffic Occupant	Airplane	All-Terrain Vehicle	Bicycle	Pedestrian	Snow Machine	Water Transport W/O Drowning	
2006	Aleutian-Pribilof	0	1	0		0	0	0	1
	Bristol Bay	0	0	0		0	1	0	1
	Total	0	1	0	0	0	1	0	2
2007	Aleutian-Pribilof	1	0	0	0	0	0		1
	Bristol Bay	0	0	0	0	1	0		1
	Total	1	0	0	0	1	0	0	2
2008	Bristol Bay	0	1	0	0	0		0	1
	Kodiak	1	0	1	0	0		0	2
	Total	1	1	1	0	0	0	0	3
2009	Aleutian-Pribilof	0		0	1	0	0	0	1
	Total	0	0	0	1	0	0	0	1
2010	Kodiak	1		0	0	0			1
	Total	1	0	0	0	0	0	0	1
Total	Aleutian-Pribilof	1	1	0	1	0	0	0	3
	Bristol Bay	0	1	0	0	1	1	0	3
	Kodiak	2	0	1	0	0	0	0	3
	Total	3	2	1	1	1	1	0	9
Regional Percentage		33%	22%	11%	11%	11%	11%	0%	100%
Statewide Percentage		61%	4%	9%	6%	11%	7%	2%	100%

Alaska Trauma Registry Data, March 2012 (HHS, 2012)

5. Local contribution to capital costs

I'd clarify that communities that make the minimum federal match get "0" points, and communities that do not provide any match will not be considered (maybe that will happen in your call for nominations).

I'd suggest the required cost estimate could be provided by an engineering firm. I'd suggest the estimate should include a scope that outlines project extents and purpose and need, and must recognize project development costs including planning, environmental analysis, right-of-way analysis and acquisition, permitting, design, geotechnical analysis, utility accommodations, and construction costs.

6. Contribution to M&O costs

Rather than requiring ALL of a certain asset class be owned, I'd suggest that points be based on a percentage of ownership, and supplement the five points for assuming ownership of a state facility or three points for maintaining ownership.

Below are the tables from the Southwest Alaska Transportation Plan derived from DataPort data. In that study roads that were functionally classified as were rural minor collectors, rural local and urban local roads are “Community Roadways,” primarily for accessing local land. An analysis like this could be done for a project proponent. ADOT&PF could provide 0.5 points for each 10% of ownership, for up to 5 additional points for road ownership. This would reward communities that took responsibility for community infrastructure.

Table 30: Ownership of Corridor Roadways in Southwest Alaska

Borough or Census Area	Percent Ownership		Miles	
	Local	State	Local	State
Aleutians West Census Area	100	0	8	
Aleutians East Borough	32	68	2	5
Kodiak Island Borough	11	89	5	43
Dillingham Census Area	5	95	0	7
Bristol Bay Borough	0	100		15
Lake and Peninsula Borough	0	100		9
Totals for the Region	16%	84%	15	80

Source: DOT&PF, 2011f

Note: Miles are rounded from more detailed figures available in Appendix C. Because totals reflect rounding of the detailed figures, the totals may vary from the totals derived from the numbers shown.

Table 31: Ownership of Community Roadways in Southwest Alaska

Borough or Census Area	Percent Ownership ¹		Miles ²	
	Local	State	Local	State
Aleutians West Census Area	100		58	
Bristol Bay Borough	95	5	61	3
Aleutians East Borough	66	16	32	7
Dillingham Census Area	65	35	51	46
Kodiak Island Borough	65	35	56	52
Lake and Peninsula Borough	62	38	36	22
Totals for the Region	67%	30%	292	130

Source: DOT&PF, 2011f

¹ Percent ownership includes federal roads, which are not displayed on this table. In the AEB, 8.7 miles of community road, or 18%, are federally owned. The AEB is the only borough where federal ownership exceeds a percent.

² Miles are rounded from more detailed figures available in Appendix C. Because totals reflect rounding of the detailed figures, the totals may vary from the totals derived from the numbers shown.

Just for information, here is how road ownership percentages shook out in 2011:

Table 32: State and Local Roadway Ownership by Borough and Census Area

Borough ¹	Miles Ownership				Percentage Ownership			
	Community Road		Corridor		Community Road		Corridor	
	Local	State	Local	State	Local	State ²	Local	State
<i>Ownership:</i>								
Yakutat City and Borough	9.5	29.8	0.0	15.6	24%	76%	0%	100%
Denali Borough	34.3	47.4	0.0	112.3	42%	58%	0%	100%
Northwest Arctic Borough	37.5	40.4	55.0	2.0	48%	52%	96%	4%
Kodiak Island Borough	55.9	51.7	5.3	43.0	52%	48%	11%	89%
Dillingham Census Area	50.6	46.2	0.3	6.9	52%	48%	5%	95%
Skagway Municipality	10.0	8.9	0.0	14.9	53%	47%	0%	100%
Haines Borough	20.6	18.3	1.2	52.7	53%	47%	2%	98%
Wrangell City and Borough	6.5	5.4	1.7	11.4	55%	45%	13%	87%
Ketchikan Gateway Borough	29.6	22.4	6.4	32.7	57%	43%	16%	84%
Lake and Peninsula Borough	35.5	21.5	0.0	8.6	62%	38%	0%	100%
Matanuska-Susitna Borough	363.4	193.1	36.6	489.4	65%	35%	7%	93%
Kenai Peninsula Borough	995.7	241.2	4.8	336.3	80%	20%	1%	99%
Aleutians East Borough	31.5	7.4	2.2	4.6	81%	19%	32%	68%
Juneau City And Borough	79.0	7.8	13.8	87.1	91%	9%	14%	86%
North Slope Borough	39.9	3.2	5.7	181.1	93%	7%	3%	97%
Sitka City and Borough	28.1	2.2	5.1	14.5	93%	7%	26%	74%
Bristol Bay Borough	60.8	3.3	0.0	15.3	95%	5%	0%	100%
Aleutians West Census Area	57.7	0.0	7.6	0.0	100%	0%	100%	0%
Wade Hampton Census Area	0.0	0.0	0.0	1.6	0%	0%	0%	100%

Source: DOT&PF, 2011f

¹ Boroughs and census areas outside of Southwest Alaska are in grey.

² Community roads owned by the state are candidates to be transferred to local governments according to the state LRTP (DOT&PF, 2008).

8. Environmental Approval Readiness

Clarify who can determine environmental readiness, ADOT&PF Environmental staff *and* environmental analyst consultants? If only ADOT&PF environmental staff can, we should make sure they have availability and budget – both challenging in these fiscal times.

10. Cost effectiveness

In the notes, change “stand along” to “stand alone.”

11. Deficient bridges

The discussion of “bridge ratings” is unclear. Do we mean functionally obsolete or structural deficiency? Or, is it deficiency in a bridge inspection element?

12. Functional Class

Change “Principle” to “principal.”

I’d suggest clarifying the arbiter of “designated freight route.” By who? FHWA National Highway Freight Network? Given the FAST act emphasis on freight, I wonder if there should be more emphasis on it?

Other issues:

When I worked there, ADOT&PF collected data for rut depth, international roughness index and pavement serviceability index. I’d suggest we incorporate this data into evaluating proposals, thereby providing some data-based elements to project selection, and leveraging the Pavement Management System (PMS) group. The purpose of the PMS program is to monitor state road quality, but my understanding is that most minor collectors are included: might be worth checking with the PMS folks to see if the data group has shrunk, or if the sample size is big enough to represent most roads that would be considered. I’ve been out of state service for six years, so any of these items may have changed, but if a road is not included in this inventory I question if it warrants consideration under the urban/rural program. This proposed analysis is a little complex given the tools available, and I am happy to walk you through what I’m thinking if you want.

For each of these there are scales that generally correspond to good, fair, poor and failed. Since the goal is to avoid addressing “worst first,” roadways rated “fair” and “poor” would score higher than those rated “good” or “failed.”

Below are the scales that were established in 2010 (the colors correspond to road center line colors that were available in a kmz for google earth):

Rut	
0 - 0.24"	: Do Nothing
0.25" - 0.49"	: Localized Patching
0.5" - 0.74"	: Design Rehabilitation Project and Patch as Needed
>= 0.75"	: Rehabilitation Project or Immediate Maintenance Overlay Required

IRI	
0 - 64	: Preventative Maintenance
64 - 127	: Preventative/Corrective Maintenance
128 - 190	: Preventative/Corrective Maintenance
191 - 253	: Corrective Maintenance/Patch
254+	: Patch

PSR	
0.0 - 2.5	: Major Rehab and/or Reconstruction Needed
2.6 - 3.0	: Rehab - Project Design and Construction Needed
3.1 - 3.4	: Corrective Maintenance, Plan for future Rehab
3.5 - 3.9	: Preventative Maint as needed.
4.0 - 5.0	: Do Nothing or Preventative Maint

If we translate the existing scales into “good,” “fair,” “poor” and “failed,” and provided a numerical score, it *could* look something like this (as example):

Score	Recommended Action	Proposed Evaluation	Proposed Score
RUT			
0-0.24”	Do nothing	Good	0
0.25”-0.49”	Localized patching	Fair	5
0.5”-0.74”	Design rehab project and patch as needed	Poor	3
>/= 0.75”	Rehab project or immediate mx overlay required	Failed	1
Pavement Serviceability Report			
4.0-5.0	Do nothing or preventative maintenance	Good	0
3.5-3.9	Preventative maintenance as needed	Fair	5
3.1-3.4	Corrective maintenance, plan for future rehab	Fair	4
2.6-3.0	Rehab – project design and construction needed	Poor	3
0.0-2.5	Major rehab and/or reconstruction needed	Failed	1
International Roughness Index			
0-64	Preventative maintenance	Good	0
64-127	Preventative/corrective maintenance	Fair	5
128-190	Preventative/corrective maintenance	Fair	4
191-253	Corrective maintenance/patch	Poor	3
254+	Patch	Failed	1

For example, here is the data for 36th Avenue in Anchorage, Section 134770-9 as measured in 2010:

Rut depth: 0.76 IRI: 131 PSR: 2
 Score: 1 4 1 = 6

Here is data for 3rd Avenue in Haines, 298006-5 as measured in 2010

Rut depth: 0.29 IRI: 472 PSR: 1.2
 Score: 5 1 1 = 7

Here is data for 49th State Street in Palmer, 136805-1 as measured in 2010:

Rut depth: 0.38 IRI: 133 PSR: 3.3
 Score: 5 4 4 = 13

In this scenario, although 49th State Street does not have the worst condition, it would get the most points for cost efficient rehabilitation.

Thank you for your consideration, and good luck with the next round of projects!

Brantner, Maren H (DOT)

From: Lawrence Bredeman
<lbredeman@gmail.com>
Sent: Friday, June 23, 2017 1:52 PM
To: dot.stip
Cc: Greene, Alexa J (DOT); Tiffany B. Simmons;
Yvonne Adams; Myra Shryock; Walter Peter jr.;
Peter Tony; Paul.Rettinger@dot.gov
Subject: Comment on 18-21 CTP PEB

STIP Criteria, Page 4; "Sponsor commitment must be in writing and passed by the governing body of the community or tribe before points will be assigned."

Because the State of Alaska's Administration and Legislature refusal to politically recognize the state's 230 (+ or -) federally recognized tribal governments this forces ADOT to require a "waiver of **sovereign immunity**" for transportation related Memorandums of Understanding (MOU) required by FHWA Tribal Transportation Program Agreements before a tribe can provide local tribal matching funds for projects or maintenance operations where the ADOT has pulled out and maintains no presence. This position **undermines** the tribes ability to agree to provide FHWA Tribal Transportation Program annual tribal shares for project matching or maintenance funds allowed by 25 CFR 170 when public facilities projects are identified and owned by others that provide public access to the tribal community. I think a solution that makes the most sense is for the state to provide a letter to the tribe stating it's inability to provide funding and request the that all state public facilities be transferred from state owned to tribally owned. This would relieve the state's **liability** and remove the **financial** burden to maintain where there's no longer a physical ADOT presence.

It is my belief the Tribal Nations of Alaska are ready and willing to partner with the State of Alaska Department of Transportation & Public Facilities to assume ADOT duties on behalf of tribal communities and the general public and accept the financial burden to improve public health and safety of all Alaskan tribal **communities**.

Respectfully,

Lawrence Bredeman

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FAIRBANKS NORTH STAR BOROUGH

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June 26, 2017

State of Alaska, Department of Transportation and Public Facilities
Program Development
P.O. Box 112500
Juneau, AK 99811-2500

Sent Electronically to:
dot.stip@alaska.gov

Re: Comments on proposed Project Evaluation Criteria for the CTP Program 2018-2021

Dear Sir or Madam:

Thank you for the opportunity to comment on the criteria for the Community Transportation Program (CTP) for 2018-2021. Please consider the below comments as the official comments from the Fairbanks North Star Borough (FNSB) Administration. The CTP has been pivotal in the past for funding projects within FNSB Rural Service Areas and DOT roads outside of the Metropolitan Planning Area. These criteria are the foundation upon which FNSB project submittals will be judged, and as such are very important to the Borough. It is important for the criteria to be fair, representative of community needs, and applied consistently for an objective evaluation of project submittals. Please accept these comments and suggestions for your CTP evaluation criteria as we believe minor modifications to the criteria will yield a stronger project pool and result in a thoroughly prioritized project list for ADOT&PF funding.

The Borough's comments were developed in two parts. The first being overall comments for the whole "Urban and Rural" criteria list, and the second being specific comments on each "Urban and Rural" draft criteria standard.

Overall Comments

- The criteria should be geared towards an audience of applicants from the public/municipalities in order for them to submit strong project candidates. As written, many of the criteria appear to be geared to the scorer, rather than a community representative nominating a project.
- The criteria should be written to help support projects like signing, lighting, rehabilitation, reconstruction, or other unique projects that might significantly benefit a local community. These are important projects and should be able to score high marks, but as written, the criteria would down grade these types of projects. One solution might be to have a couple of categories to rank more project appropriate criteria, such as weighting the "other factors" category higher to give scorers the opportunity to emphasize these unique projects.

Comments by Criteria Category or "Standard"

1. **Economic Benefits**—The statement on "new direct access to a community resource" should be removed in all criteria. If not removed, a "Community Resource" needs to be defined. This should be broadened beyond "new direct access" to include improvements that can benefit important economic development generators, such as provide "new direct access" for modes that are not previously served.

2. **Health and Quality of Life**—Please consider splitting this criterion which uses a dissimilar set of evaluation criteria. Focus on criteria which are quantitative to allow applicants to conform submittals for a strong project pool. Please define “negative factor” or provide examples, as it is unclear.
3. **Safety**—Please elaborate if all criteria in the scoring category must be met, or just one, as it is not clear.

Also, is DOT going to provide the data (i.e. HSIP, Crash Rates, etc.)? The category should say, “Calculate rates and statistics with the assistance of DOT,” or “DOT will calculate rates and statistics,” as it is not possible for many communities, especially small communities to compile this data independently.

4. **Intermodal Transportation**—Please consider removal of this category. There is nothing inherently beneficial about a project being “intermodal.” Also, was the intent to say “multi-modal?” “Intermodal” typically refers to goods movements, where “multi-modal” refers to people using multiple modes to complete a trip, or a facility that supports use of a number of modes giving people modal choice. Please clarify as it appears the written explanation is more geared towards “multi-modal.” Also, what does “lessen redundant facilities” relate to? If you truly mean “Intermodal,” then a better definition is needed.
5. **Contributions**—It is not clear what a project scores if the applicant contributes the required 9.03%, so please clarify. If an applicant is contributing the required match it should be scored above “contributes nothing.” Please amend the criteria to reflect where a project contributing the required match will be scored.
6. **Contribution to fund M&O costs**—Section “A” should relate back to the M&O costs of the facility itself, not DOT’s M&O costs and the Local’s willingness to perform M&O activities in support of DOT facilities. According to Alaska DOT&PF, the CTP program was created “to fund surface transportation projects at the local level.” Biasing projects that directly reduce DOT&PF’s M&O cost absolutely should not be a factor in scoring these projects. Projects with the greatest overall benefit should be chosen. If M&O costs are to remain a criterion, it should be overall M&O cost reduction and not just for the DOT&PF.

Please consider removing the criteria language from Subsection (5) as it has nothing to do with the merits of the project. The same is true for everything after AND in the Subsection (3) criteria language. Language should state that it is an M&O priority for the local agency (5), (3), etc.

In Section “B,” why is the proposed weighting 0-5?

7. **Public Support**—In the interest of fairness, a local area should get at least a point for having a resolution of support from a local elected body; please consider amending the criteria. There should also be a role for community petitions from affected persons within a project area boundary. Further, under Subsection (5), the verbiage “located in an area not represented by a locally elected body” should be deleted.
8. **Environmental Approval**—If a project has a completed environmental document it should receive extra points. But, the type of NEPA process should be removed from the criteria as this attempts to predetermine the NEPA outcome. For example, if a project goes through an Environmental

Assessment, the outcome is a FONSI or an EIS, which absolutely could not be determined at the project scoring level. Please amend these criteria not to reflect specific NEPA types.

9. **System Reliability**—Please remove “4 points if not State owned.” This is the “Community” Transportation Program,” with a purpose “to fund surface transportation projects at the local level.” As such it is expected that the type of projects would be community based. Giving more points for a State road project seems biased and incongruous with the intent of the program. The focus should be projects with the greatest community benefit.
10. **Cost Effectiveness**—This category biases “3-R” type projects because they are linear and relatively inexpensive per mile of roadway. Spot improvements, including intersection improvements, may be better use of limited funding, with potentially greater benefits over cheaper linear projects. Please consider revising this category.
11. **Deficient Bridges**— Is an applicant penalized if there are no bridges in the project limits? Please clarify in the criteria where a project with no bridges would score. Also, projects that restore/rehab/replace deficient bridged should be weighted as “5.”
12. **Functional Class**—This criterion indicates +1 point if the project is on NHPP or interstate highways. But, are NHPP or interstate highway projects eligible to use CTP funds? If not, please remove this reference as those roadways can be funded through Alaska’s NHPP funding and not the small amount of CTP funding in the STIP. That said, why is this criteria weighted so highly?
13. **Other Factors**—What is “innovation creativity?” We suggest the project should solve a problem that may have been brought about through unique circumstances. Please keep the criteria broad to fit many unique situations that present themselves.

Again, thank you for this opportunity to comment. The FNSB believes that these suggested edits will make the evaluation process stronger for a more robust vetting of proposed project submittals.

Sincerely;



Karl W. Kassel, Mayor
Fairbanks North Star Borough

KK/dg