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of **ALASKA**
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AMATS Policy Committee
Anchorage Metropolitan Area Transportation Solutions
Anchorage, Alaska

Subject: Continued Policy Discussion Regarding AMATS Metropolitan Planning Area Boundary Update

Dear AMATS Policy Committee Members,

DOT&PF appreciates the continued work of the AMATS Policy Committee, Technical Advisory Committee, Municipality of Anchorage staff, DOT&PF staff, and agency partners to advance the Metropolitan Planning Area boundary update. Within the AMATS structure, the State of Alaska and the Municipality of Anchorage serve as co-planning partners, and the work completed to date reflects a shared interest in maintaining a compliant, functional, and regionally responsive metropolitan transportation planning process.

I am submitting this letter in my DOT&PF capacity to help frame continued Policy Committee discussion. The intent is not to direct a predetermined outcome, but to identify the areas where DOT&PF believes additional review, documentation, and policy discussion are needed before the proposed boundary can be recommended for Governor approval.

Federal metropolitan planning regulations reinforce that the metropolitan transportation planning process is intended to be continuous, cooperative, and comprehensive. Under 23 CFR 450.306(b), that process is required to consider and support a broad set of planning factors, including economic vitality and global competitiveness, safety and security, mobility and accessibility for people and freight, environmental stewardship, consistency with planned growth and economic development patterns, multimodal connectivity, efficient system management and operation, preservation of existing transportation assets, resiliency and reliability, and travel and tourism. Those factors are directly relevant to the boundary discussion because the MPA boundary should support effective metropolitan planning without creating unnecessary ambiguity over lands, facilities, or corridors that do not meet the basis for inclusion.

The Policy Committee previously advanced a proposed boundary based on the information and understanding available at that time. DOT&PF does not view that action as a failure of the process. Rather, as our collective understanding has matured through continued review, ongoing dialogue with FHWA and FTA regarding the continuing, cooperative, and comprehensive planning process, and increased attention to clear documentation and procedural consistency, it has become apparent that portions of the boundary need further refinement.

Our shared objective should be a boundary that supports transportation needs in Anchorage and the MPA, respects the interests and responsibilities of both planning partners, avoids unnecessary ambiguity, and can adapt as conditions change. A clear and justifiable boundary will also support future MTP/TIP/STIP consistency, project development, and Governor approval.

Background and Need for Further Review

The current boundary update has been under discussion since at least late 2023. In January 2024, the Technical Advisory Committee reviewed the proposed boundary and recommended Policy Committee approval. The Policy Committee then advanced the updated proposed boundary for public comment. Following public comment, AMATS finalized the proposed boundary in August 2024.

DOT&PF subsequently raised concerns regarding portions of the proposed expansion, including areas along the Seward Highway, additional NHS/Interstate mileage outside the Urbanized Area, and expansion into lands not expected to urbanize. Those concerns were discussed at Policy Committee and Technical Advisory Committee meetings in 2024 and 2025 and were further described in DOT&PF's February 25, 2025 response letter.

The purpose of revisiting these issues now is to develop a stronger shared record. DOT&PF believes the Policy Committee can resolve these items constructively by reviewing the boundary on a topic-by-topic basis and determining where the current proposal is supportable, where it should be refined, and where additional documentation or agency coordination is needed.

1. Alignment with the Urbanized Area and 20-Year Growth Expectations

The MPA boundary should be grounded in the 2020 Census Urbanized Area and any contiguous areas reasonably expected to become urbanized within the 20-year planning horizon.

DOT&PF recommends that the Policy Committee revisit areas where the proposed boundary extends beyond the UZA without a clearly documented planning basis. The issue is not whether these areas have regional transportation relevance. The question is whether the record supports inclusion under the federal MPA boundary standard.

A refined boundary should distinguish between facilities or corridors that are important to regional mobility and lands that are reasonably expected to become urbanized. That distinction will help ensure the boundary remains defensible and useful as a long-term planning tool.

2. Chugach State Park Lands and Other Lands Not Expected to Urbanize

DOT&PF recommends revisiting the proposed inclusion of Chugach State Park lands.

Chugach State Park lands are not expected to urbanize within the 20-year planning period. Their inclusion may create additional procedural complexity without providing a clear metropolitan planning benefit. A more supportable approach would be to align the boundary with the UZA and the Chugach State Park boundary, rather than extending the MPA into protected park lands.

This recommendation is not intended to minimize the importance of park access, safety, recreation travel, or regional connectivity. Those issues remain important planning considerations. However, they may be better addressed through coordination, project-level planning, and agency consultation rather than broad inclusion of undevelopable park lands within the MPA.

DOT&PF recommends removing proposed Expansions 1, 2, 4, and 12 from the boundary as currently drafted to the extent those areas are wholly within Chugach State Park or otherwise encompass lands not expected to urbanize.

DOT&PF also recommends refining proposed Expansions 3, 5, and 7 rather than treating them as wholly acceptable or wholly unacceptable. Where portions of these areas align with the UZA or are supported by a documented 20-year urbanization rationale, they may be appropriate for inclusion. Where portions extend into Chugach State Park or other lands not expected to urbanize, the boundary should be adjusted accordingly.

This approach allows the Policy Committee to preserve appropriate metropolitan planning coverage while improving precision and reducing future jurisdictional uncertainty.

3. Coordination with the Department of Natural Resources

Because Chugach State Park is managed by the Department of Natural Resources, DOT&PF recommends that any boundary discussion involving park lands or park access routes include documented consultation with DNR.

The Policy Committee should have the benefit of DNR's perspective on whether MPA inclusion would affect park infrastructure planning, maintenance, access management, or project delivery. This coordination would improve the record and help ensure the boundary decision reflects the operational responsibilities of the agencies that manage the affected lands.

DOT&PF and the Municipality of Anchorage have initiated discussions with DNR and looks forward to continued dialogue among DOT&PF, the Municipality of Anchorage, AMATS staff, and DNR as these issues are refined.

4. Areas Where Boundary Inclusion May Improve Planning Coordination

DOT&PF recognizes that not every proposed boundary adjustment raises the same concern. In some locations, inclusion within the MPA may improve planning coordination, particularly where transportation facilities or management responsibilities are split between state and municipal interests or where inclusion would reduce ambiguity in project planning.

DOT&PF agrees that segments of roadway with bifurcated management, operational responsibility, or planning responsibility may be appropriate for inclusion where the record supports that inclusion. The goal should be to include areas where MPA coverage improves transportation planning coordination, while avoiding expansion into lands or corridors where inclusion is not supported by the federal boundary criteria.

This distinction is important. DOT&PF is not seeking to limit the boundary for its own sake. Rather, DOT&PF is seeking a boundary that reflects where metropolitan planning coverage is necessary, useful, and supportable.

5. Seward Highway Corridor South of the UZA

DOT&PF recommends limiting inclusion of the Seward Highway corridor south of the UZA to the segment recognized within the 2020 Census Urban Area unless additional documentation supports a broader boundary.

The Seward Highway is unquestionably significant to Anchorage, Southcentral Alaska, statewide mobility, freight, emergency access, recreation, and safety. However, regional significance alone

does not necessarily establish the basis for MPA inclusion where the surrounding lands are not expected to urbanize.

The boundary should be based on the federal planning criteria for an MPA, not solely on the importance of the corridor. This distinction is important because MPA inclusion has downstream effects on MTP, TIP, STIP, and project delivery processes.

6. Additional Glenn and Seward Highway NHS/Interstate Mileage

DOT&PF recommends revisiting proposed Expansion 6 to the extent it adds Glenn Highway or Seward Highway NHS/Interstate mileage outside the UZA or outside the previously approved boundary without a documented urbanization basis.

These are critical statewide facilities. Their importance is not in dispute. The question is whether additional highway mileage should be included in the MPA based on federal boundary criteria, as opposed to corridor continuity or system significance alone.

A clear record on this issue will help both AMATS and DOT&PF avoid future confusion between metropolitan planning coordination and state responsibility for NHS and Interstate facilities.

7. Boundary Decisions Should Be Separated from Individual Project Disagreements

DOT&PF recommends that the Policy Committee treat the boundary update as a long-term planning framework issue, separate from any individual project dispute.

Projects such as Seward Highway improvements raise important policy, safety, environmental, fiscal, and community questions. Those questions should be addressed through the appropriate project development and planning processes. The MPA boundary itself should be based on consistent, repeatable criteria that can endure beyond any one project or amendment cycle.

Maintaining that separation will support healthier policy discussion and reduce the risk that the boundary is perceived as either advancing or constraining a particular project outcome.

8. Port of Alaska and Alaska Railroad Corporation Areas

DOT&PF can support inclusion of the Port of Alaska and Alaska Railroad Corporation areas where their inclusion is tied to metropolitan freight, logistics, intermodal connectivity, and urban transportation planning.

These areas are distinguishable from protected park lands or unsupported highway corridor extensions because they have a direct relationship to the metropolitan freight and economic system. Their inclusion can be supported where the record clearly demonstrates their relationship to the Anchorage urbanized transportation network.

Documented coordination with Port officials and the Alaska Railroad should be included in the final boundary request package for completeness.

Requested Path Forward

DOT&PF respectfully requests that the Policy Committee direct additional review of the proposed boundary based on the topics above, with the goal of developing a revised boundary that can be supported by both AMATS planning partners and advanced for Governor approval.

To support that discussion, DOT&PF recommends that AMATS staff, Municipality of Anchorage staff, DOT&PF staff, and relevant agency partners develop a boundary review matrix that identifies, for each proposed expansion area:

1. Its relationship to the 2020 Census Urbanized Area;
2. Whether the area is reasonably expected to become urbanized within the 20-year planning horizon;
3. Whether the area includes protected, undevelopable, or agency-managed lands;
4. Whether additional agency consultation is needed, including with DNR;
5. Whether the area includes transportation facilities with bifurcated management or planning responsibility;
6. Whether the area includes NHS or Interstate facilities outside the UZA;
7. Whether inclusion is needed for freight, intermodal, or metropolitan planning purposes; and
8. Whether the proposed boundary should be retained, refined, or removed.

A revised boundary should:

1. Align with the 2020 Census Urbanized Area;
2. Include only contiguous areas expected to become urbanized within the 20-year planning horizon;
3. Exclude Chugach State Park lands unless a clear and documented basis for inclusion is established;
4. Include documented consultation with DNR where park lands or park access are implicated;
5. Refine proposed expansions to avoid inclusion of undevelopable or unsupported areas;
6. Avoid adding NHS/Interstate highway mileage solely on the basis of corridor significance;
7. Preserve appropriate inclusion of freight and intermodal areas such as the Port of Alaska and Alaska Railroad Corporation facilities; and
8. Provide a clear record that supports Governor approval and future MTP/TIP/STIP alignment.

DOT&PF remains committed to working with the Municipality of Anchorage and AMATS staff to resolve these issues constructively. We have a shared interest in advancing transportation investments that support safety, mobility, freight movement, economic development, and community needs across the Anchorage region.

As we continue to improve our planning processes and increase the quality and resolution of our documentation, I am confident that we can reach a shared understanding and establish a boundary that supports effective planning now and remains adaptable as conditions change.

Respectfully,



Katherine Keith
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Acting Central Region Director
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