

Roadway	Segment Start	Segment End	Current Functional Classification	Proposed Functional Classification for 2025	Current AADT (lowest to highest recorded within segment)	Justification
Bannister Drive/E 24th Avenue	Latouche Street	Maplewood Street	Minor Collector	Local Road	150-210	Well below the 1,100 vpd lower threshold of a minor collector
Birch Road	Huffman Road	Naknek Lane	Minor Collector	Local Road	990	At the AADT threshold for minor collector
Blackberry Street	West Dimond Blvd	Strawberry Road	Major Collector	Minor Collector	1,360 – 1,530	Low density housing. Distance to higher class roadways less than ¾ of a mile
Bragaw Street	Glenn Highway	Northern Lights Blvd	Principal Arterial	Minor Arterial	15,000 – 16,700	Right at the AADT threshold for a minor arterial
Brayton Drive	De Armoun Road	Huffman Road	Major Collector	Local Road	880 – 4,030	Well below the 1,100 vpd lower threshold of a minor collector
Brayton Drive	Huffman Road	O'Malley Road	Minor Collector	Local Road	740	Well below the 1,100 vpd lower threshold of a minor collector
Caravell Drive	Raspberry Road	Jewel Lake Road	Minor Collector	Local Road	720	Well below the 1,100 vpd lower threshold of a minor collector
Chandalar Drive	Patterson Street	E 20 th Avenue	Minor Collector	Local Road	930	Well below the 1,100 vpd lower threshold of a minor collector
Cordova Street	International Airport Road	E Tudor Road	Minor Collector	Local Road	840	Well below the 1,100 vpd lower threshold of a minor collector

Reference: FHWA Highway Functional Classification Concepts, Criteria and Procedures 2023 Edition (February)

Functional Classification	AADT Threshold
Principal Arterial	7,000 - 27,000
Minor Arterial	3,000 - 14,000
Major Collector	1,100 – 6,300
Minor Collector	1,100 – 6,300
Local Road	80 - 700

*Please note that the Current AADT column only shows the lowest and highest AADT captured within the specific segment (may have multiple AADT). There is no difference in AADT threshold for Major and Minor Collector, the difference of functional classification lies in the lane and inside/outside shoulder width.

Roadway	Segment Start	Segment End	Current Functional Classification	Proposed Functional Classification for 2025	Current AADT (lowest to highest recorded within segment)	Justification
Cordova Street	E 16 th Avenue	E 15 th Avenue	Major Collector	Local Road	980	Well below the 1,100 vpd lower threshold of a major collector
Cordova Street	E 15 th Avenue	E 5 th Avenue	Major Collector	Minor Collector	1,590 – 1,740	Low density housing. Distance to higher class roadways less than ¾ of a mile
Cordova Street	E 5 th Avenue	E 3 rd Avenue	Major Collector	Local Road	680 – 1,020	Well below the 1,100 vpd lower threshold of a major collector
Cranberry St/W 64th Ave/Collins Way	Raspberry Road	Jewel Lake Road	Minor Collector	Local Road	870 – 1,090	This is a problematic cut-through route for the MOA. MOA has installed traffic calming and cut-through prohibition signage. MOA is also identifying this corridor for it's Neighborhood Greenway Treatment as a lower volume, lower stress, route for cyclists through neighborhoods.
Denali Street	36 th Avenue	Tudor Road	Minor Arterial	Major Collector	5,360 – 7,440	AADT
E 20th Avenue	Muldoon Road	Patterson Street	Minor Collector	Local Road	790	Well below the 1,100 vpd lower threshold of a minor collector
E 30th Avenue	Sunflower Street	Boniface Pkwy	Minor Collector	Local Road	500	Well below the 1,100 vpd lower threshold of a minor collector

Reference: FHWA Highway Functional Classification Concepts, Criteria and Procedures 2023 Edition (February)

Functional Classification	AADT Threshold
Principal Arterial	7,000 - 27,000
Minor Arterial	3,000 - 14,000
Major Collector	1,100 – 6,300
Minor Collector	1,100 – 6,300
Local Road	80 - 700

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Roadway	Segment Start	Segment End	Current Functional Classification	Proposed Functional Classification for 2025	Current AADT (lowest to highest recorded within segment)	Justification
E 50 th Avenue	Lake Otis Pkwy	East Termini	Minor Collector	Local Road	390	Well below the 1,100 vpd lower threshold of a minor collector
E 64 th Avenue	Brayton Drive	Quinagak Street	Minor Collector	Local Road	730	Well below the 1,100 vpd lower threshold of a minor collector
E 64 th Avenue/Norm Drive	Laurel Street	Elmore Road	Major Collector	Local Road	500	Below the 1,100 vpd lower threshold of a major collector
E 72 nd Avenue	West Termini	Elmore Road	Minor Collector	Local Road	500	Well below the 1,100 vpd lower threshold of a minor collector
E 84 th Avenue	West Termini	Elmore Road	Minor Collector	Local Road	580	Well below the 1,100 vpd lower threshold of a minor collector
E 88 th Avenue	West Termini	Elmore Road	Minor Collector	Local Road	520	Well below the 1,100 vpd lower threshold of a minor collector
Elmore Road	Providence Drive	Dr. Martin Luther King Jr Drive	Principal Arterial/ Minor Arterial	Major Collector	2,580 – 6,300	AADT
Elmore Road	O'Malley Road	De Armoun Road	Major Collector	Minor Collector	870 – 1,100	AADT
Ensign Drive	Bayshore Drive	Southport Drive	Minor Collector	Local Road	560	Well below the 1,100 vpd lower threshold of a minor collector
Fireweed Lane	Seward Highway	Spenard Road	Minor Arterial	Minor Collector	4,760 – 6,580	AADT
Forest Park Dr/Hillcrest Drive	Northern Lights Blvd	Minnesota Drive	Major Collector	Minor Collector	1,470 – 1,600	Low density housing, less than ¼ of a mile

Reference: FHWA Highway Functional Classification Concepts, Criteria and Procedures 2023 Edition (February)

Functional Classification	AADT Threshold
Principal Arterial	7,000 - 27,000
Minor Arterial	3,000 - 14,000
Major Collector	1,100 – 6,300
Minor Collector	1,100 – 6,300
Local Road	80 - 700

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Roadway	Segment Start	Segment End	Current Functional Classification	Proposed Functional Classification for 2025	Current AADT (lowest to highest recorded within segment)	Justification
Golden View Drive	North Termini	Rabbit Creek Road	Minor Collector	Local Road	330	Well below the 1,100 vpd lower threshold of a minor collector
Homer Drive	Tudor Road	E International Airport Road	Major Collector	Local Road	870 – 6,540	Well below the 1,100 vpd lower threshold of a major collector
Huffman Road	Birch Road	East Termini	Minor Collector	Local Road	70	Well below the 1,100 vpd lower threshold of a minor collector
Huffman Road	West Termini	Hillside Drive	Minor Collector	Local Road	90	Well below the 1,100 vpd lower threshold of a minor collector
I Street	6 th Avenue	15 th Avenue	Principal Arterial	Minor Arterial	3,800 – 12,000	AADT supports minor arterial
Ingra/Gambell/Seward Highway	5 th Avenue	36 th Avenue	Interstate	Principal Arterial	8,430 – 50,900	Lack of access control/AADT
Jamestown Dr/Commodor Drive	O'Malley Road	Independence	Major Collector	Local Road	1,260 – 1,740	Well below the 1,100 vpd lower threshold of a major collector
Jodhpur Street	W Dimond Blvd	Kincaid Road	Minor Collector	Local Road	690	Well below the 1,100 vpd lower threshold of a minor collector
Karluk Street	20 th Avenue	Glenn Highway	Minor Collector	Local Road	1,090 – 1,630	Below the 1,100 vpd lower threshold of a minor collector
Klatt Road	Victor Road	Old Seward Hwy	Minor Arterial	Major Collector	1,530 – 7,530	AADT
L Street	5 th Avenue	15 th Avenue	Principal Arterial	Minor Arterial	3,030 – 15,300	AADT supports minor arterial

Reference: FHWA Highway Functional Classification Concepts, Criteria and Procedures 2023 Edition (February)

Functional Classification	AADT Threshold
Principal Arterial	7,000 - 27,000
Minor Arterial	3,000 - 14,000
Major Collector	1,100 – 6,300
Minor Collector	1,100 – 6,300
Local Road	80 - 700

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Roadway	Segment Start	Segment End	Current Functional Classification	Proposed Functional Classification for 2025	Current AADT (lowest to highest recorded within segment)	Justification
Lake Otis Pkwy	O'Malley Road	Huffman Road	Minor Arterial	Minor Collector	5,220	Lower traffic numbers, lower density
Lake Otis Pkwy	Norther Lights Blvd	15 th Avenue	Principal Arterial	Minor Arterial	10,800 – 12,900	AADT supports minor arterial
Lake Otis Pkwy	Abbott Road	O'Malley Road	Principal Arterial	Minor Arterial	12,300	AADT
Lake Otis Pkwy	O'Malley Road	De Armoun Road	Minor Arterial	Major Collector	890 – 5,220	AADT
Lois Drive	Spenard Road	W 36 th Avenue	Minor Collector	Local Road	530	Well below the 1,100 vpd lower threshold of a minor collector
Lore Road	West Termini	Spruce Street	Minor Collector	Local Road	590	Well below the 1,100 vpd lower threshold of a minor collector
Medfra Street	10 th Avenue	5 th Avenue	Minor Collector	Local Road	240	Well below the 1,100 vpd lower threshold of a minor collector
Northern Lights Blvd	Aero Avenue	Boeing Lane	Minor Arterial/ Major Collector	Minor Collector	2,500 – 6,900	AADT
Northern Lights Blvd	Baxter Road	Muldoon Road	Principal Arterial	Minor Arterial	9,870 – 11,500	AADT
Northway Drive	Debarr Road	Penland Pkwy	Minor Collector	Local Road	670	Well below the 1,100 vpd lower threshold of a minor collector
Oceanview Drive	High View Drive	Venus Way	Major Collector	Minor Collector	1,110 – 1,420	Low density housing. Distance to higher class roadways less than ¼ of a mile

Reference: FHWA Highway Functional Classification Concepts, Criteria and Procedures 2023 Edition (February)

Functional Classification	AADT Threshold
Principal Arterial	7,000 - 27,000
Minor Arterial	3,000 - 14,000
Major Collector	1,100 – 6,300
Minor Collector	1,100 – 6,300
Local Road	80 - 700

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Roadway	Segment Start	Segment End	Current Functional Classification	Proposed Functional Classification for 2025	Current AADT (lowest to highest recorded within segment)	Justification
Old Klatt Road	Victor Road	Timberlane Drive	Major Collector	Local Road	170 – 1,080	Well below the 1,100 vpd lower threshold of a major collector
Prospect Drive	Upper O'Malley Road	Slalom Drive	Minor Collector	Local Road	740	Well below the 1,100 vpd lower threshold of a minor collector
Providence Drive	Lake Otis Pkwy	Elmore Road	Principal Arterial/Minor Arterial	Major Collector	2,580 – 6,300	Change is due to AADT (volume lower than arterial standard)
PussyWillow Street	E 32 nd Avenue	E 36 th Avenue	Minor Collector	Local Road	290	Well below the 1,100 vpd lower threshold of a minor collector
Sand Lake Road	Raspberry Road	Dimond Blvd	Major Collector	Minor Collector	2,410 – 5,020	AADT
Spenard Road	Hillcrest Drive	Northwood Drive	Minor Arterial	Major Collector	3,480 – 14,600	To match what is being done with the Spenard Road Projects
Spruce Street	E 64 th Avenue	Fergy Circle	Minor Collector	Local Road	500	Well below the 1,100 vpd lower threshold of a minor collector
Sultana Drive	Upper Huffman Road	Northeast Termini	Minor Collector	Local Road	310	Well below the 1,100 vpd lower threshold of a minor collector
Timberlane Drive	Thomasson Drive	Old Klatt Road	Major Collector	Local Road	700	Well below the 1,100 vpd lower threshold of a major collector
Upper Huffman Road	Hillside Drive	Toilsome Hill Drive	Major Collector	Minor Collector	1,590 – 2,020	AADT

Reference: FHWA Highway Functional Classification Concepts, Criteria and Procedures 2023 Edition (February)

Functional Classification	AADT Threshold
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Minor Arterial	3,000 - 14,000
Major Collector	1,100 – 6,300
Minor Collector	1,100 – 6,300
Local Road	80 - 700

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Roadway	Segment Start	Segment End	Current Functional Classification	Proposed Functional Classification for 2025	Current AADT (lowest to highest recorded within segment)	Justification
W 7 th Avenue	L Street	A Street	Major Collector	Local Road	600 – 1,470	Mostly below the 1,100 vpd lower threshold of a major collector
W 88 th Avenue	Gloralee Street	Jewel Lake Road	Major Collector	Minor Collector	1,410	Low density housing, less than ¾ of a mile
Wesleyan Drive	Northern Lights Blvd	E 20 th Avenue	Minor Collector	Local Road	480	Well below the 1,100 vpd lower threshold of a minor collector
Westwind Drive	De Armoun Road	Legacy Drive	Minor Arterial	Local Road	890	Below the 1,100 vpd lower threshold of a minor collector and 3000 of minor arterial
1 st Avenue	N C Street	Eagle Street	Minor Collector	Local Road	780	Well below the 1,100 vpd lower threshold of a minor collector
3 rd Avenue	C Street	Reeve Blvd	Minor Arterial	Major Collector	4,380 – 4,480	AADT
5 th and 6 th Avenue	Airport Heights	Gambell Street	Interstate	Principal Arterial	49,400 – 51,100	Lack of access control fails to meet interstate/freeway standards
5 th and 6 th Avenue	C Street	I Street	Minor Arterial	Minor Arterial	10,500 – 13,100	Recommend to not change to Principal Arterial
11 th Avenue	Bottlegger Cover Drive	L Street	Minor Collector	Local Road	450	Well below the 1,100 vpd lower threshold of a minor collector
13 th Avenue	L Street	E Street	Minor Collector	Local Road	730	Well below the 1,100 vpd lower threshold of a minor collector

Reference: FHWA Highway Functional Classification Concepts, Criteria and Procedures 2023 Edition (February)

Functional Classification	AADT Threshold
Principal Arterial	7,000 - 27,000
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Roadway	Segment Start	Segment End	Current Functional Classification	Proposed Functional Classification for 2025	Current AADT (lowest to highest recorded within segment)	Justification
36 th Avenue	Spenard Road	C Street	Minor Arterial/ Principal Arterial	Major Collector	830 – 6,940	AADT
36 th Avenue	C Street	Lake Otis Pkwy	Principal Arterial	Minor Arterial	7,440 – 13,300	AADT
68 th Avenue	Old Seward Highway	Homer Drive	Minor Collector	Local Road	630	Well below the 1,100 vpd lower threshold of a minor collector
100 th Avenue	C Street	Minnesota Drive	None	Major Collector	N/A	New road, needs a classification

Reference: FHWA Highway Functional Classification Concepts, Criteria and Procedures 2023 Edition (February)

Functional Classification	AADT Threshold
Principal Arterial	7,000 - 27,000
Minor Arterial	3,000 - 14,000
Major Collector	1,100 – 6,300
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Local Road	80 - 700

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THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Transportation and Public Facilities

OFFICE OF THE COMMISSIONER
Ryan Anderson, P.E., Commissioner

PO Box 112500
Juneau, Alaska 99811-2500
Main: 907.465.3900
dot.alaska.gov

June 20, 2025

Chair and Members of the AMATS Policy Committee
Municipality of Anchorage
4700 Elmore Road
Anchorage, AK 99507

Dear AMATS Policy Committee Members,

I am writing to share an update regarding the status of Alaska's federal match funding and the recent legislative actions that have introduced risk to our shared transportation program.

During the most recent budget cycle, the Legislature reduced the Unrestricted General Funds (UGF) traditionally provided to meet Alaska's annual federal match requirement. To backfill this shortfall, they reappropriated balances from older project accounts—many of which were already spent or committed to active projects.

DOT&PF did not propose or support this approach. We advised that this would create fiscal and compliance risks and undermine the state's ability to fully leverage federal transportation dollars. Without stable match, we risk forfeiting federal dollars that return about \$10 in federal funding for every \$1 in state match.

Governor Dunleavy's veto of these reappropriations was necessary to protect the integrity of Alaska's federal match and avoid compliance findings and/or project delays.

Anchorage is Alaska's largest city and the primary freight, logistics, and passenger hub for the entire state. Many projects within the AMATS area, including key improvements for safety and mobility, depend on consistent federal match to avoid delays.

Until the Legislature resolves the shortage, DOT&PF must carefully manage remaining funds and adjust the Statewide Transportation Improvement Program (STIP) to align with what we can deliver. We will be in communication on TIP impacts to fiscal constraint because of these actions.

We appreciate your continued partnership and understanding as we work together to protect Alaska's infrastructure investment and economic future. Please reach out to my office any time with questions or for further discussion.

Sincerely,

A handwritten signature in blue ink, appearing to read "Ryan Anderson".

Ryan Anderson, P.E.

Commissioner

Alaska Department of Transportation & Public Facilities

cc:

Katherine Keith, Deputy Commissioner, DOT&PF

James Starzec, AMATS MPO Coordinator, DOT&PF

Aaron Jongenelen, AMATS Executive Director



THE STATE
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GOVERNOR MIKE DUNLEAVY

Department of Transportation and
Public Facilities
OFFICE OF THE COMMISSIONER

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Mr. Sean Holland
Chair, AMATS Metropolitan Planning Organization
4700 Elmore Road
Anchorage, AK 99507
Sean.Holland@alaska.gov

July 1, 2025

RE: AMATS STIP Amendment Two Comments

Dear Chair Holland,

Thank you for your letter dated March 19, 2025, regarding Draft Amendment Two to the 2024–2027 Statewide Transportation Improvement Program (STIP). The Alaska Department of Transportation and Public Facilities (DOT&PF) appreciates AMATS's formal input and provides the following responses to each of the issues raised by the AMATS Policy Committee.

STIP–TIP Coordination Prior to Release

DOT&PF respectfully acknowledges the AMATS Policy Committee's concern regarding coordination of Draft STIP Amendment Two prior to its public release. However, DOT&PF notes that extensive engagement with AMATS occurred throughout the development and review phases of the amendment. In the months preceding its publication, DOT&PF staff participated in more than ten AMATS Technical and Policy Committee meetings where key elements of the STIP—such as fiscal constraint, program revisions, and TIP alignment—were discussed in depth. Notably, DOT&PF leadership and staff presented directly to the AMATS Policy Committee on February 20 and March 20, 2025, specifically to provide updates on Amendment Two and respond to questions in a public setting.

Beyond these committee engagements, DOT&PF facilitated four MPO Quarterly Coordination Meetings (August 2024, December 2024, March 2025, and June 2025), co-hosted a statewide peer exchange with AMATS and FHWA in January 2025, and circulated working drafts of fiscal constraint documentation for interagency review in advance of release. AMATS staff actively participated in the MPO coordination working group and contributed to the ongoing revision of the 3C coordination policy now under review by DOT&PF.

Additional discussions during AMATS committee meetings in February and March 2025 provided further opportunity for direct feedback on Amendment Two, MPO boundary considerations, and updates to the intergovernmental operating agreement. These meetings served as important venues for clarification of technical issues, policy alignment, and incorporation of MPO input into the amendment process.

DOT&PF shares AMATS's interest in establishing a more formalized, repeatable coordination

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protocol to better synchronize the development and release of STIP and TIP amendments. The January 28–29, 2025 peer exchange—convening AMATS, the other Alaska MPOs, and peer state DOTs from Minnesota and North Dakota—surfaced several constructive strategies for enhancing interagency collaboration. AMATS’s contributions to this event, as both presenter and participant, were valuable. Strengthening our 3C coordination framework remains a priority for DOT&PF, and we welcome continued partnership with AMATS to refine and institutionalize this process.

Amendment Transparency and Change Summary Tools

Under 23 CFR § 450.218 and § 450.326, DOT&PF is obligated to follow federally prescribed amendment procedures, including public notice, fiscal constraint validation, and documentation of project revisions. Since Amendment One, DOT&PF has implemented several process enhancements to ensure transparency. The Amendment Two document package includes a change log PDF that outlines all project additions, deletions, and modifications by region and funding category. Additionally, DOT&PF launched an interactive ArcGIS-based STIP Amendment Tracker Dashboard available at STIP Amendment Tracker Dashboard¹, to support public and MPO review. This platform includes a comparative viewer for amendments and baseline STIP records, facilitating detailed examination of changes.

Fiscal Constraint Documentation

In accordance with 23 CFR § 450.218(l) and § 450.326(j), fiscal constraint is evaluated based on year-by-year comparison of available federal funding (apportionment plus unobligated carryover) against programmed obligations. The Revenue and Obligations Summary Table within Volume One: Fiscal Constraint of the STIP meets this requirement and reflects the most current estimates available at the time of amendment development. Internal draft tables circulated during pre-publication coordination (e.g., via email) are not deemed final or official under federal rulemaking standards and should not be relied upon for formal consistency analysis.

The STIP narrative presents revenue forecasts to establish long-term financial assumptions for planning purposes, while the fiscal constraint tables demonstrate enforceable year-specific funding availability. These are separate but complementary planning tools. Variances may arise due to real-time apportionment adjustments by FHWA/FTA or STIP updates that reflect recent obligation trends or unobligated balances. The MPO TIP and STIP must be fiscally constrained independently, but DOT&PF aims to harmonize these estimates to the greatest extent practicable. To reduce any confusion on this, the Revenue Forecast tables in the STIP narrative have been removed in favor of the more detailed Fiscal Constraint Demonstration tables in Volume One: Fiscal Constraint Demonstration.

Dashboard Map Representation of AMATS TIP Projects

Thank you for the suggestion to improve the visibility of AMATS TIP projects on the STIP dashboard map. Historically, the STIP portal has not included projects managed under other programs—such as the Highway Safety Improvement Program (HSIP), the Pavement and Bridge

¹<https://experience.arcgis.com/experience/7765ad22843f49bbb8dd2179c2f7d3be>

Program, or projects listed exclusively in MPO TIPs. As a result, TIP-managed projects within the AMATS boundary have not appeared in the dashboard map layer, which may unintentionally give the impression of limited investment in the area.

We agree that this is a valuable opportunity to improve transparency and public understanding. With the implementation of DOT&PF's new Project Delivery Plan (PDP), we now have an integrated system that enables us to track and display a broader range of projects, including those in the TIPs. This creates a technical pathway for including AMATS projects in future dashboard iterations.

We welcome continued collaboration with AMATS to define how TIP projects can be best represented—such as through unique marker symbology or labeled overlays—and will coordinate with your staff as your TIP mapping system is developed. This is a good idea, and we look forward to working together to enhance coordination, planning, and public engagement using these new tools.

About STIP Amendment Two

Amendment Two to the 2024–2027 STIP, submitted to FHWA and FTA on July 1, 2025, reflects a strategic rebalancing of Alaska's federally funded transportation program following the close of the legislative session. The Department delayed submittal of this amendment until enactment of the FY2026 state budget, as significant changes to the Department's unrestricted general fund (UGF) match required a comprehensive reprogramming effort to address the fiscal impacts introduced by legislative budget actions.

In the Governor's proposed and amended FY2026 budgets, DOT&PF requested approximately \$117 million in UGF to fully support anticipated federal transportation funding. This included \$90.1 million for the federal-aid highway program. These match requests were carefully calibrated to support full delivery of Alaska's transportation program in FY2026.

During the legislative process, more than \$70.2 million of the requested UGF was removed and replaced with reappropriations from previously authorized projects—many of which were already expended or committed—as well as fund balances from AIDEA. These substitutions introduced risks to the Department's ability to deliver federally funded projects in FFY2026. After DOT&PF offered clear and repeated warnings to legislative committees, the Governor exercised his veto authority to eliminate these reappropriations in order to preserve the long-term integrity of Alaska's federal match strategy. As a result, DOT&PF is now operating with \$31.8 million in available UGF for FY2026 to support the federal-aid highway program.

The available \$31.8 million is significantly below the \$90.1 million proposed to maintain fiscal constraint in accordance with 23 CFR § 450.218. DOT&PF has accordingly revised STIP Amendment Two to align programmed projects with available match. This is a procedural action required by federal regulation and does not constitute a cancellation of planned projects. However, in the absence of sufficient UGF, some projects have been deferred or reprioritized within the STIP. Amendment Two will be immediately followed by publication of a new four-year STIP (FFY2026–2029), which will offer an extended window for project deliberation and public engagement.

Despite these challenges, DOT&PF is advancing project development and delivery activities as scheduled. The Department will rely on remaining match balances to fulfill existing commitments into early FY2026. If the Legislature enacts a solution early in the upcoming session, DOT&PF expects to maintain continuity of its full program. Until that time, the Department must align its programming with actual available resources and cannot proceed based on prior assumptions or anticipated appropriations.

Amendment Two incorporates these required program revisions and ensures the STIP remains fiscally constrained and eligible for federal obligation. In recognition of the significance of these changes, DOT&PF deferred submission of the amendment until after MPO TIPs were adopted, allowing for alignment and concurrent federal review.

Conclusion Thank you again for your detailed feedback. DOT&PF is committed to transparent and accountable program delivery and values the institutional partnership with AMATS. We look forward to continued collaboration in support of regional transportation system improvement.

Sincerely,

A handwritten signature in blue ink, appearing to read "Ryan Anderson", with a stylized flourish at the end.

Ryan Anderson, P.E.
Commissioner



THE STATE
of **ALASKA**
GOVERNOR MIKE DUNLEAVY

Department of Transportation and Public Facilities

OFFICE OF THE COMMISSIONER
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February 25, 2025

Sean Holland, P.E.
Chair, AMATS Policy Committee
4111 Aviation Drive
Anchorage, AK 99519

Delivered via e-mail.

Subject: Response to January 22, 2025, Letter Regarding Anchorage Municipal Area Transportation Solutions (AMATS) Boundary and Operating Agreement Revision

Dear Chair Holland,

On January 22, 2025 Executive Director Jongenelen requested written explanations and clarifications from the Governor and myself regarding the Department of Transportation and Public Facilities (DOT&PF) and the Department of Law's concerns about the AMATS Operating Agreement and boundary changes. We hope the following explanations and clarification satisfy the request of the Policy Committee.

Legal Authorities Governing National Highway System Facilities in the MPA

The attached summary of legal authorities governing National Highway System (NHS) facilities within the Metropolitan Planning Area (MPA) includes controlling state and federal requirements. This document is intended to serve as a readily accessible reference for discussions among the Policy Committee, Technical Committee, and the public. The index is expandable, so please advise if additional topics related to Metropolitan Planning Organization (MPO)-State coordination should be included.

The legal authorities governing the inclusion of NHS projects in planning documents, as well as the selection or rejection of NHS projects within the MPA, are the primary focus of this summary. From the State's perspective, a key source of friction and delay in the planning process is AMATS's assertion of authority to select NHS projects for inclusion in or exclusion from planning documents. This assertion of authority over the selection of the State's NHS projects was in clearest display on November 21, 2024 when the AMATS Policy Committee voted to remove the Safer Seward Highway Project from AMATS's MTP, for the expressly stated purpose of removing the project from the Transportation Improvement Program (TIP) in Amendment 2. As explained in detail below, the selection of the State's NHS projects for inclusion in the TIP and the Statewide Transportation Improvement Program (STIP) is a State authority and not an MPO authority.

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The State's NHS projects are per se regionally significant by definition in federal regulations, as the State's NHS projects serve regional transportation needs such as access to and from the area outside the region. 23 CFR 450.104. Regionally significant projects *shall* be incorporated into the MPO's TIP and STIP in accordance with governing federal regulations. 23 CFR 450.326(f) and 23 CFR 450.218(h), respectively. Thus, the AMATS Policy Committee November 21, 2024 vote to remove the State's regionally significant NHS project was contrary to the duties imposed on that committee by federal regulations.

While both the State and the MPO have a duty to cooperate in the development of the TIP and STIP, federal law mandates that this cooperation be directed toward ensuring the inclusion of the State's selected NHS projects in these planning documents, rather than their exclusion. For your situational awareness, federal regulations do not limit the definition of "regionally significant" projects to NHS facilities. As such, MPO projects such as principal arterial highways may also benefit from this classification.

Transportation Management Area (TMA) MPOs, such as AMATS, may select any federally funded project within the MPA *except* projects on the NHS. 23 USC 134(k)(5)(A). NHS projects within the MPA shall be selected for implementation by the State from the approved TIP. 23 USC 134(k)(5)(A). The State and AMATS each have a duty to cooperate in the development of the TIP through a continuing and comprehensive planning process. 23 USC 134(k)(2). The MPO's selection of all projects excluding NHS projects is done in cooperation with the State and, conversely, the State's selection of NHS projects within the MPA is done in cooperation with the MPO. Contrary to statements previously made by AMATS staff, the MPO does not have the authority to select or "deselect" NHS projects from the TIP.

Operating Agreement Updates

AMATS's assertion of authority to include or exclude from the TIP NHS projects located within the MPA has disrupted what was previously a cooperative highway planning process and is impeding the State's project delivery. To restore clarity regarding decision-making authority over NHS routes within the MPA, the State requires an update to the operating agreement to clarify and come to a common understanding of legal authorities and procedures for coordinated development of planning documents. Federal regulations mandate such an update when there is a substantial change in decision-making authority or responsibility. 23 CFR 450.310(j)(2). The State considers AMATS's continuing assertion of authority over NHS routes within the MPA to constitute a "substantial change," necessitating a process to establish and document the procedures governing these newly claimed authorities.

State and federal laws allow the Municipality of Anchorage to assume all or part of the authorities and responsibilities for the NHS routes located within the MPA. The attached index of authorities provides references to the laws and legal standards for the Municipality to assume responsibility for portions of the NHS or specific components of project development, delivery, or maintenance. DOT&PF can collaborate with the MPO and the Municipality to transfer such authorities and obligations or to relinquish, modify, or review NHS routes within the MPA. However, any such changes must be mutually agreed upon and formally documented to delineate responsibilities for specific transportation facilities and the corresponding planning processes.

Given recent challenges in project selection and planning, the Policy Committee may benefit from exploring ways to enhance regulatory clarity, project efficiency, and technical support. Federal law provides flexibility in structuring State-MPO coordination, allowing opportunities to refine processes for better alignment with state and federal requirements while maintaining regional transportation priorities. Clearly defining DOT&PF's role in technical planning and programming could improve coordination and long-term planning outcomes. If the Policy Committee sees value in strengthening technical partnerships, DOT&PF remains committed to offering expertise and support in a way that serves regional needs while respecting the Committee's autonomy.

Concerns Regarding AMATS's Boundary Expansion Proposal

Your January 22, 2025, letter specifically requested clarification on why AMATS's boundary expansion is linked to DOT&PF's request to revisit the operating agreement. The primary reason is that AMATS's proposed expansion includes areas that do not meet federal criteria for MPA expansion.

AMATS's proposal seeks to expand the boundary southward to include an additional mile of the Seward Highway and approximately 1.5 square miles of Chugach State Park. However, 23 CFR 450.312(a)(1) authorizes MPA expansion beyond the existing urbanized area in those areas "expected to become urbanized within a 20-year forecast period." Neither the Seward Highway nor Chugach State Park can reasonably be expected to urbanize within any forecast period. Similarly, AMATS's proposal includes adding 6.25 miles of the Glenn Highway, including the entire Eagle River Loop Road interchange—areas that also do not meet federal urbanization criteria. These segments of the highway system are NHS properties, exclusively managed and operated by DOT&PF.

Since the need to update the operating agreement arises from AMATS's assertion of decision-making authority over NHS facilities, DOT&PF cannot make a recommendation to the Governor on AMATS's proposed boundary expansion until there is a clear, shared understanding of jurisdiction over these facilities.

We also observed that many other areas in AMATS's boundary expansion proposal share common characteristics:

- They are located outside the designated urban area (with a few small exceptions).
- They include properties that cannot be urbanized in the future.
- They are managed and operated by non-municipal agencies (except for the Port of Alaska properties).

The largest portion of the expansion proposal covers Chugach State Park, followed by additional expansions over DOT&PF's NHS properties. The Department of Natural Resources (DNR) and its Division of Parks and Outdoor Recreation reported no prior knowledge of AMATS's expansion proposal. This is concerning, as the expansion would impact all access routes to Chugach State Park from the Anchorage Bowl.

Before DOT&PF can make a recommendation on AMATS's proposal, we require additional information on:

1. AMATS's coordination efforts with DNR.

2. Whether AMATS plans to include DNR representation on its committees (23 CFR 450.310(d)(1)(iii)).
3. DNR's stance on the proposed expansion.

Similarly, the proposal does not clarify coordination efforts with the Alaska Railroad Corporation and the Port of Alaska regarding the inclusion of their facilities in the MPA expansion. Further details on these discussions are also necessary before proceeding.

As part of this review, we also developed a GIS dataset documenting the AMATS boundary as it existed in 2010, the 2014 update, and the proposed 2024 boundary expansion. However, we found no documentation confirming the Governor's approval of the 2014 update. Therefore, we assume the current request for approval will also encompass the 2014 update to ensure compliance with federal and state laws and regulations.

The GIS boundary datasets are available at the following link:

<https://experience.arcgis.com/experience/0cfd6c2623b0426cbe83f9c48a020335/>

Next Steps

To move forward, we recommend a joint effort between AMATS and DOT&PF to:

1. Update the Operating Agreement to clarify legal authorities and ensure compliance.
2. Reevaluate AMATS's proposed boundary expansion in coordination with relevant agencies and with consideration of appropriate authorities.

As the Chair of the AMATS Policy Committee, I'm asking you to lead this effort and prioritize its timely completion. As we work towards the December 29, 2026 MPA expansion deadline, we look forward to continued collaboration to improve communication and coordination in this critical transportation planning process.

Sincerely,



Ryan Anderson, P.E.

Attachments: As Stated

CC Aaron Jongenelen, Executive Director, AMATS
 James Starzek, AMATS Transportation Planner / Coordinator
 Graham Downey, Policy Committee Member
 Jason Olds, Policy Committee Member
 Mark Littlefield, Policy Committee Member
 Daniel Volland, Policy Committee Member
 Meg Zaletel, Policy Committee Member

INDEX OF AUTHORITIES REGARDING NHS FACILITIES WITHIN MPAs

Under State law, the State of Alaska is mandated to maintain full responsibility and authority over the State highway system. The State of Alaska, through DOT&PF, is similarly obligated to plan, construct, and maintain the network of highways linking the cities and communities in the various regions of the State. The highway system linking the various regions of State of Alaska has been designated as part of the National Highway System.

1. State must construct and maintain state highway system – [AS 19.10.030](#)
2. DOT&PF obligated to plan construct and maintain the regional NHS – [AS 19.05.125](#)
3. Alaska’s regional routes have been designated part of NHS – [23 USC 103\(b\)](#) and [Maps](#)

State and Federal laws and regulations mandate a collaborative approach to transportation planning within metropolitan areas. However, these laws and regulations do not grant a Metropolitan Planning Organization power or authority to veto or “de-select” the State’s selected NHS projects that are located within a municipal planning area; nor do these laws and regulations grant the State the power to veto or “de-select” the MPO’s non-NHS projects located within the municipal planning area.

4. MPO selects non-NHS projects in the MPA – [23 USC 134\(k\)\(5\)\(A\)](#)
5. State selects NHS projects in the MPA – [23 USC 134\(k\)\(5\)\(B\)](#)
6. TIP shall contain “All regionally significant projects” – [23 CFR 450.326\(f\)](#)
7. STIP shall contain “All regionally significant projects” – [23 CFR 450.218\(h\)](#)
8. The State’s NHS projects are “regionally significant projects” – [23 CFR 450.104](#)

Re-designation of a MPO, including updates to its operating agreement, is required when there is a substantial change in decision-making authority or responsibility. The MPO’s assertion of selection or “de-selection” authority over NHS projects located in the MPA is a substantial change in decision-making authority. The extent of the MPO’s new change in decision-making authority or responsibility over NHS projects or routes, and the procedures to implement any new authority and responsibility must be documented in writing.

9. Operating agreement must be amended with substantial change in decision-making authority – [23 CFR 450.310\(j\)](#)
10. Periodic review of operating agreement required – [23 CFR 450.314\(b\)](#)
11. Division of responsibility over NHS projects located in the MPA must be in writing – [23 CFR 450.314\(a\)](#)

State law authorizes DOT&PF to delegate planning authority over NHS projects located in the MPA, and Federal law even authorizes the State to propose modifications of the NHS, although both actions must be done by cooperative agreement between the MPO and the State.

12. Municipality may request planning authority for NHS corridors within the MPA—
[AS 19.20.015](#)
13. State can delegate NHS planning authority to municipality — [AS 19.15.030](#).
14. State can propose any modification to the NHS, in cooperation with local and regional officials. [23 USC 103\(b\)\(3\)](#).

The MPO's metropolitan transportation plan, from which it selects its projects for inclusion into the TIP, is required to include "major roadways" and smaller transportation facilities to function as an integrated metropolitan transportation system. State and Federal laws and regulations do not contemplate NHS projects, and similar corridor projects that connect rural and urban areas, as the type of transportation facilities for which the MPOs have primary decision making responsibilities.

15. MPO's MTP identifies facilities that function as an integrated metro system that serves regional transportation functions. [23 USC 134\(j\)\(2\)\(A\)](#):
16. MPO's MTP shall include facilities that function as an integrated metro system that serves regional transportation functions. [23 CFR 450.324\(f\)](#):
17. Municipality shall ensure proper integration of State highway connections in municipal highway plan — [AS 19.20.080](#)

1. [AS 19.10.030](#). The department is responsible for the construction and maintenance of the state highway system. [\(Return\)](#)
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2. [AS 19.05.125](#). The purpose of AS 19.05 - AS 19.25 is to establish a highway **department capable of carrying out a highway planning, construction, and maintenance program that will provide** a common defense to the United States and the state, **a network of highways linking together cities and communities throughout the state** (thereby contributing to the development of commerce and industry in the state, and aiding the extraction and utilization of its resources), and otherwise improve the economic and general welfare of the people of the state. [\(Return\)](#)
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3. [23 USC 103\(b\)](#) National Highway System.-(1) Description.-The National Highway System consists of the highway routes and connections to transportation facilities that shall-(A) serve major population centers, international border crossings, ports, airports, public transportation facilities, and other intermodal transportation facilities and other major travel destinations; (B) meet national defense requirements; and (C) serve interstate and interregional travel and commerce.[\(Return\)](#)
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4. [23 USC 134\(k\)\(5\)](#) "Selection of Projects. (A) In general.-**All Federally funded projects** carried out within the boundaries of a metropolitan planning area serving a transportation management area under this title **(excluding projects carried out on the National Highway System)** or under chapter 53 of title 49 **shall be selected for implementation from the approved TIP by the metropolitan planning organization** designated for the area in consultation with the State and any affected public transportation operator." [\(Return\)](#)
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5. [23 USC 134\(k\)\(5\)\(B\)](#): "**National Highway System projects**.--Projects carried out within the boundaries of a metropolitan planning area serving a transportation management area on the National Highway System **shall be selected for implementation from the approved TIP by the State** in cooperation with the metropolitan planning organization designated for the area." [\(Return\)](#)
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6. [23 CFR 450.326\(f\)](#) "**The TIP shall contain all regionally significant projects** requiring an action by the FHWA or the FTA whether or not the projects are to be funded under title 23 U.S.C. Chapters 1 and 2 or title 49 U.S.C. Chapter 53 (e.g., addition of an interchange to the Interstate System with State, local, and/or private funds and congressionally designated projects not funded under 23 U.S.C. or 49 U.S.C. Chapter

53). For public information and conformity purposes, the TIP shall include all regionally significant projects proposed to be funded with Federal funds other than those administered by the FHWA or the FTA, as well as all regionally significant projects to be funded with non- Federal funds.” [\(Return\)](#)

7. [23 CFR 450.218\(h\)](#): “**The STIP shall contain all regionally significant projects** requiring an action by the FHWA or the FTA whether or not the projects are to be funded with 23 U.S.C. Chapters 1 and 2 or title 49 U.S.C. Chapter 53 funds (e.g., addition of an interchange to the Interstate System with State, local, and/or private funds, and congressionally designated projects not funded under title 23 U.S.C. or title 49 U.S.C. Chapter 53). For informational and conformity purposes, the STIP shall include (if appropriate and included in any TIPs) all regionally significant projects proposed to be funded with Federal funds other than those administered by the FHWA or the FTA, as well as all regionally significant projects to be funded with non-Federal funds.” [\(Return\)](#)
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8. [23 CFR 450.104](#): “**Regionally significant project means a transportation project** (other than projects that may be grouped in the TIP and/or STIP or exempt projects as defined in EPA's transportation conformity regulations ([40 CFR part 93, subpart A](#))) **that is on a facility that serves regional transportation needs** (such as access to and from the area outside the region; major activity centers in the region; major planned developments such as new retail malls, sports complexes, or employment centers; or transportation terminals) and would normally be included in the modeling of the metropolitan area's transportation network. At a minimum, this includes all principal arterial highways and all fixed guideway transit facilities that offer an alternative to regional highway travel.” [\(Return\)](#)
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9. [23 CFR 450.310\(j\)](#): “**Redesignation of an MPO** (in accordance with the provisions of this section) **is required** whenever the existing MPO proposes to make: ... (2) A substantial change in the decisionmaking authority or responsibility of the MPO, or in decisionmaking procedures established under MPO by-laws.” [\(Return\)](#)
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10. [23 CFR 450.314\(b\)](#): “The MPO, the State(s), and the providers of public transportation should periodically review and update the agreement, as appropriate, to reflect effective changes.” [\(Return\)](#)
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11. [23 CFR 450.314\(a\)](#). The MPO, the State(s), and the providers of public transportation **shall cooperatively determine their mutual responsibilities** in carrying out the metropolitan transportation planning process. These responsibilities shall be **clearly identified in written agreements** among the MPO, the State(s), and the providers of public transportation serving the MPA. [...] [\(Return\)](#)

12. [AS 19.20.015](#). Local control of state transportation corridors. **(a) A municipality, by resolution of its governing body, may request of the department the assumption of the department's responsibilities relating to planning of transportation corridors that are to be located within the boundaries or operating area of the municipality.** ... The parties may by mutual agreement provide for joint or cooperative assumption of responsibilities by the department and the municipality. [\(Return\)](#)

13. [AS 19.15.030](#). Participation by municipality in federal highway construction. When a federal-aid highway is routed through a municipality, it may participate in the financing, planning, construction, acquisition of right-of-way, and maintenance of the highway **in the manner and proportion the department determines is reasonable and proper.** [\(Return\)](#)

14. [23 USC 103\(b\)\(3\)](#). Modifications to NHS.—(A)In general.—The Secretary may make any modification to the National Highway System, including any modification consisting of a connector to a major intermodal terminal or the withdrawal of a road from that system, that is proposed by a State if the Secretary determines that the modification—

- (i) meets the criteria established for the National Highway System under this title after the date of enactment of the MAP–21; and
- (ii) (I) enhances the national transportation characteristics of the National Highway System; or
- (II) in the case of the withdrawal of a road, is reasonable and appropriate.

(B) Cooperation.—(i) In general.— In proposing a modification under this paragraph, a State shall cooperate with local and regional officials. (ii) Urbanized areas.— In an urbanized area, the local officials shall act through the metropolitan planning organization designated for the area under section 134. [\(Return\)](#)

15. [23 USC 134\(i\)\(2\)\(A\)](#) “Identification of transportation facilities [for the MTP].- (i) In general.-An identification of **transportation facilities** (including major roadways, public transportation facilities, intercity bus facilities, multimodal and intermodal facilities, nonmotorized transportation facilities, and intermodal connectors) **that should function as an integrated metropolitan transportation system**, giving emphasis to those facilities that serve important national and regional transportation functions.” [\(Return\)](#)

16. [23 CFR 450.324\(f\)](#): “**The metropolitan transportation plan shall, at a minimum, include:** ... (2) Existing and proposed **transportation facilities** (including major roadways, public transportation facilities, intercity bus facilities, multimodal and intermodal facilities, nonmotorized transportation facilities (e.g., pedestrian walkways and bicycle facilities), and intermodal connectors) **that should function as an integrated metropolitan transportation system**, giving emphasis to those facilities that serve important national and regional transportation functions over the period of the transportation plan.” [\(Return\)](#)
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17. [AS 19.20.080](#). A municipality of over 5,000 population, according to the latest available census, together with the department, shall develop and adopt a master highway plan, which **shall insure the proper location and integration of the Alaska highway connections in the municipality**. In selecting and designating the master highway plan, they shall take into account the important principal streets that connect residential areas with business areas and the streets that carry important rural traffic into and across the municipality, in order to ensure a system of highways upon which traffic can be controlled and protected in a manner to provide safe and efficient movement of traffic in the municipality. [\(Return\)](#)

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ITEM: 5E
DATE: 20 March 2025
TO: AMATS Policy Committee
FROM: Aaron Jongenelen, AMATS Coordinator
SUBJECT: DOT&PF Operating Agreement and Boundary Response Letter

ACTION REQUESTED

AMATS Staff and the Technical Advisory Committee recommend the Policy Committee review and approve sending the letter from DOT&PF out for independent legal review, tabling the discussion on the operating agreement until results are received from the independent legal review, and direct staff to schedule a discussion about expanding the MPO boundary to cover the entire MOA on a future agenda.

TAC ACTION TAKEN

The AMATS TAC reviewed the DOT&PF letter, the memo provided by staff, and made the following recommendation:

- “Move to recommend to the PC to send the letter from DOT&PF out for independent legal review, table the discussion on the operating agreement until results are received from the independent legal review, add a discussion on a future agenda about revisiting the boundaries of the MPO to include the entire MOA.”

BACKGROUND

On January 22, 2025, the AMATS Policy Committee approved sending a letter to the Governor and Commissioner of DOT&PF asking for more information regarding the boundary changes AMATS submitted in 2024 and DOT&PF’s concerns raised regarding the operating agreement.

DOT&PF provide a response letter. Staff reviewed the letter and has some comments/concerns:

Legal Authorities Governing National Highway System Facilities in the MPA:

- This section makes an assertion that the MPO must include all NHS projects within the MPA boundary as they are “*per se regionally significant by definition in federal regulation*”. That is not what is stated in federal regulations and is an interpretation by Alaska DOT&PF:

“Regionally significant project means a transportation project (other than projects that may be grouped in the TIP and/or STIP or exempt projects as defined in EPA's transportation conformity regulations ([40 CFR part 93, subpart A](#))) that is on a facility that serves regional transportation needs (such as access to and from the area outside the region; major activity centers in the region; major planned developments such as new retail malls, sports complexes, or employment centers; or transportation terminals) and would normally be included in the modeling of the metropolitan area's transportation network. At a minimum, this includes all principal arterial

highways and all fixed guideway transit facilities that offer an alternative to regional highway travel.”

MPOs are given the ability to define what are regionally significant projects within their boundary. At this time AMATS does not have a definition, but staff recommends exploring and defining one. FAST Planning in Fairbanks does include a definition for their area: [Microsoft Word - 20240219 FFY23-27 TIP Admin Mod 5 Narrative](#).

- The section confuses the term “shall” for NHS projects and ignores that all projects go through the MPO process, including approval by the PC. All projects are required to be consistent with the MTP and included in the TIP in order to qualify for federal funding. It does not mean that these projects ignore the approval process established by the MPO or outlined in federal regulations merely by being located on the NHS system. This section also ignores the information provided by FHWA/FTA during the AMATS certification review process in 2019 that explains in fact that the MPO does have a veto authority for projects within the MPA boundary. The MPO PC is made up of representatives, both State and Local, in the region and it is their job to make sure that projects in the MPO boundary coordinate with the vision laid out in the MTP. Additionally, this fact is supported by the Minnesota MPO peer from the 2025 peer exchange. During that peer exchange FHWA repeated many times that all projects must go through the MPO approval process and stated that this was explained to DOT&PF and the DOT&PF lawyer by FHWA and FHWA lawyers multiple times during the most recent STIP development cycle.
- *“While both the State and the MPO have a duty to cooperate in the development of the TIP and STIP, federal law mandates that this cooperation be directed toward ensuring the inclusion of the State’s selected NHS projects in these planning documents, rather than their exclusion.”*

That is not supported by any of the federal regulations listed in this document or any that are available online. The federal mandate is to have a continuing, comprehensive, and cooperative process where all parties come together to manage the transportation system.

- This section also does not account for federal regulations regarding air quality. Title 42 Chapter 85 Subchapter 1 Part D subpart 1 section 7506 (c)(1) states: *“No metropolitan planning organization designated under section 134 of title 23, shall give its approval to any project, program, or plan which does not conform to an implementation plan approved or promulgated under section 7410 of this title.”*

MPOs are required to develop an air quality demonstration on any project that falls within the non-attainment or Limited Maintenance Area. Air Quality requirements do not exclude NHS projects. The assertion that MPOs have no ability to exclude NHS projects from the TIP fails when reviewed under the air quality conformity requirements outlined above.

- *“This assertion of authority over the selection of the State’s NHS projects was in clearest display on November 21, 2024 when the AMATS Policy Committee voted to remove the Safer Seward Highway Project from AMATS’s MTP, for the expressly stated purpose of removing the project from the Transportation Improvement Program (TIP) in Amendment 2.”*

The last portion of this statement is categorically false. TIP amendment #2 was approved prior to the PC meeting in November. On April 18th, 2024, the Policy Committee approved TIP amendment #2 in which the Safer Seward Highway Project was removed from the TIP and put on the illustrative category because DOT&PF was unable to provide funding information at that time. Additionally, in November of 2024 the PC only directed staff to draft the MTP Amendment #1 with the project removed. Action on the MTP amendment is not anticipated until April 2025.

- *“As explained in detail below, the selection of the State’s NHS projects for inclusion in the TIP and the Statewide Transportation Improvement Program (STIP) is a State authority and not an MPO authority.”*

The TIP is an MPO authority. Final approval of the TIP is done via the PC. While the Governor approves the inclusion of the TIP into the STIP, the PC has final approval of the TIP.

- *“the State’s selection of NHS projects within the MPA is done in cooperation with the MPO.”*

The NHS projects for inclusion in the TIP were not selected in cooperation with the MPO. A list was given to AMATS staff for inclusion of projects with no explanation on how they were selected, what the scoring criteria was, what the scores were, or even how they help to implement the performance measures for the State of Alaska. No information was given to the MPO on how these projects align with the State Long Range Plan or how they help to address the needs in the community.

The projects not on the NHS selected by the MPO for inclusion in the TIP were done in cooperation with DOT&PF. DOT&PF staff participated in the scoring development, the scoring of the projects, selection of projects for inclusion in the TIP, review of the TIP narrative which denotes this entire process along with performance measures that the projects help to implement, in assisting with responding to public comments, and the final review and approval via the TAC and PC.

Operating Agreement Updates:

- *“To restore clarity regarding decision-making authority over NHS routes within the MPA, the State requires an update to the operating agreement to clarify and come to a common understanding of legal authorities and procedures for coordinated development of planning documents. Federal regulations mandate such an update when there is a substantial change in decision-making authority or responsibility. 23 CFR 450.310(j)(2).”*

There has been no change in authority as stated multiple times by FHWA to DOT&PF. The authority has been there since at least 1991 and has been used in the past. For example, the Knik Arm Bridge and Toll Authority was removed from the Anchorage Bowl 2025 LRTP by the AMATS PC in 2009.

- This section also counters the assertions in the previous section. If it is believed that AMATS does not have the legal authority to say no to a project on the NHS for inclusion in planning documents, why is there a need to update the operating agreement to reflect that stance?

Concerns Regarding AMATS's Boundary Expansion Proposal:

- *"AMATS's proposal seeks to expand the boundary southward to include an additional mile of the Seward Highway and approximately 1.5 square miles of Chugach State Park. However, 23 CFR 450.312(a)(1) authorizes MPA expansion beyond the existing urbanized area in those areas "expected to become urbanized within a 20-year forecast period." Neither the Seward Highway nor Chugach State Park can reasonably be expected to urbanize within any forecast period. Similarly, AMATS's proposal includes adding 6.25 miles of the Glenn Highway, including the entire Eagle River Loop Road interchange—areas that also do not meet federal urbanization criteria. These segments of the highway system are NHS properties, exclusively managed and operated by DOT&PF."*

The federal citation here excludes the second part of the federal regulations that govern boundary development:

"23 CFR 450.312 (a)(2) The MPA boundaries may be further expanded to encompass the entire metropolitan statistical area or combined statistical area, as defined by the Office of Management and Budget."

The United State Census Bureau produces the metropolitan and micropolitan statistical area maps found here: [2020 State-based Metropolitan and Micropolitan Statistical Areas Maps](#). The one for Alaska clearly shows that the statistical area for Anchorage is the entire Municipality of Anchorage and the entire Matanuska-Susitna Borough. As such, the MPO is authorized through federal law to include any part of those two areas in the MPA boundary if desired without requiring the "urbanized within a 20-year forecast period" clause. As such, any aspect of the State Park, DOT&PF owned facilities, MOA facilities or other areas governed by any other agency is eligible to be included within the MPA boundary if it falls within the metropolitan statistical area.

The current boundary for AMATS only includes the western half of the Glenn Highway between Anchorage and Chugiak Eagle River, the boundary is misaligned down the center of the highway, so this update corrects to add the eastern half. The Hiland Interchange is already included with only the southeastern portion being added. All these changes were documented and provided to DOT&PF.

Also, according to 23 CFR 450.312 (d) "MPA boundaries may be established to coincide with the geography of regional economic development and growth forecasting areas." Parks and other recreational areas are sources of growth, traffic, and critical to the economy of a community. It is essential to ensure these are included in the MPA boundary to ensure inclusion in the MPO modeling and future forecasting.

- The section regarding DNR is as follows:

- AMATS is not required to coordinate with DNR or any other agency not specifically spelled out in the operating agreement or federal regulation.
 - **1. AMATS's coordination efforts with DNR.** – Does this mean to ask about coordination efforts with DNR for everything AMATS does or just for the boundary?
 - **2. Whether AMATS plans to include DNR representation on its committees (23 CFR 450.310(d)(1)(iii)).** – This federal citation does not indicate that DNR is required to be included on the AMATS committees. At this time the AMATS PC has not indicated to staff an effort to add DNR to any committee.
 - **3. DNR's stance on the proposed expansion.** – DNR has not provided a stance on the proposed expansion and AMATS is not required to get their stance.
- *“The Department of Natural Resources (DNR) and its Division of Parks and Outdoor Recreation reported no prior knowledge of AMATS's expansion proposal. This is concerning, as the expansion would impact all access routes to Chugach State Park from the Anchorage Bowl.”*

Is DOT&PF able to produce an instance in the past of DNR having issues with AMATS and causing impacts to access route to the State Park from the Anchorage Bowl? Staff has not been made aware of these issues nor is staff able to find anything.

Conversely, staff is able to show improved access to the State Parks via AMATS funding provided for the southern parking lot improvement at Potter Marsh.

- *“Similarly, the proposal does not clarify coordination efforts with the Alaska Railroad Corporation and the Port of Alaska regarding the inclusion of their facilities in the MPA expansion. Further details on these discussions are also necessary before proceeding.”*

The Don Young Port of Alaska and Alaska Railroad Corporation are voting members of the AMATS Technical Advisory Committee as outlined on the various planning document produced, the Public Participation Plan, the AMATS Operating Agreement, and as listed on the PublicInput website: [Technical Advisory Committee - PublicInput](#). As such, coordination with those agencies was done during the TAC review of the boundary changes.

- *“As part of this review, we also developed a GIS dataset documenting the AMATS boundary as it existed in 2010, the 2014 update, and the proposed 2024 boundary expansion. However, we found no documentation confirming the Governor's approval of the 2014 update. Therefore, we assume the current request for approval will also encompass the 2014 update to ensure compliance with federal and state laws and regulations.”*

DOT&PF being unable to find documents does not negate the approved boundary work done in previous years. USDOT/FHWA are the final approvers/accepters of an MPO boundary. USDOT houses all the accepted boundaries for MPOs here: [Metropolitan Planning Organizations | Geospatial at the Bureau of Transportation Statistics](#). The 2014 boundary changes were accepted by USDOT/FHWA and are already included in the boundary on their website. AMATS staff used this boundary as a starting point for the 2024 update, to ensure full compliance with Federal data. Staff found a few missing pieces that were in the previous boundary and added them back in to this update. All this information was document and provided to DOT&PF.



METROPOLITAN PLANNING ORGANIZATION

MEMORANDUM

- AMATS provided all GIS data for DOT&PF to develop the GIS dataset document the AMATS boundary changes. However, the link provided in the letter does not work. It requires state access to use it.

ATTACHMENT

DOT&PF Response Letter on Operating Agreement and Boundary Update