



METROPOLITAN PLANNING ORGANIZATION
4700 Elmore Road
Anchorage, Alaska 99507

Ryan Anderson, P.E.
Commissioner
Alaska Department of Transportation & Public Facilities
P.O. Box 112500
3132 Channel Drive
Juneau, Ak 99811-2500

DATE: 08/24/2023

SUBJECT: 2024-2027 STIP
Comments

Dear Commissioner Anderson,

Anchorage Metropolitan Area Transportation Solutions (AMATS) would like to thank the Alaska Department of Transportation & Public Facilities (DOT&PF) for the chance to comment on the 2024-2027 Statewide Transportation Improvement Program (STIP). AMATS comments will be separated into three types of comments: overall, major, and technical.

Overall Comments:

1. AMATS would like to thank DOT&PF Program Development staff for being responsive in helping answer questions about the new STIP. Program Development staff have been knowledgeable and helpful and AMATS looks forward to continuing the successful working partnership.
2. Providing the new interactive STIP map and moving towards more interactive information is very positive to see.
3. Providing more information on funding, such as on the deep dive pages, is very positive and AMATS supports that effort.
4. The new airtables being provided are wonderful for searching through and really appreciated. However, they might need some work to be more user friendly for individuals not working with this type of information every day.

Major Comments:

1. Per 23 CFR 450.218 (b) “For each metropolitan area in the State, the State shall develop the STIP in cooperation with the MPO designated for the metropolitan area.” There was no coordination with AMATS prior to the draft document being released for the 45-day public comment period.
2. There appears to be missing information from the STIP website and/or document. AMATS staff was unable to find the following that was specifically referenced in the STIP document under “Data-Informed Project Evaluation Board”:
 - a. Project applications that were used for new projects to be reviewed and scored by the PEB.
 - b. Project criteria and the data used.
 - c. A list of all new projects with their scores.

These scores show why and how a project was selected for inclusion in the STIP versus other projects. Right now there appears to have been no process done and it is hard to see why some projects are being funded over others.

AMATS relies on the State to do a robust project selection process for the STIP. As such, AMATS does not do a separate scoring of projects that DOT&PF requests be included in the TIP. As this appears to not have been done for the 2024-2027 STIP there are serious concerns raised about the process and how AMATS historically has added STIP projects to the TIP. All STIP projects within the AMATS area must be approved by the MPO.

3. Per 23 CFR 450.218 (q) “A STIP shall include, to the maximum extent practicable, a discussion of the anticipated effect of the STIP toward achieving the performance targets identified by the State in the statewide transportation plan or other State performance-based plan(s), linking investment priorities to those performance targets.” This information appears to be missing from the STIP document. The TPM discussion on page 18 does not go into much detail on this item. AMATS recently went through a certification review and received a corrective action on this item for the TIP. AMATS would like to coordinate with the State on how best this can be achieved for the STIP and AMATS TIP.
4. There are projects in the deep dive documents of the STIP that the total project cost estimate does not match the amounts shown in the tables. For example Sterling Highway Milepost 45-60 Reconstruction and Realignment shows the total project cost estimate for 23-30 is \$330M, but when you add up the funding shown in the tables that breaks down the project by phase is totals \$431M. The deep dive information doesn’t match up with what is in the STIP document itself.
5. The AMATS allocations for the CTP and TAP are different from the 2020-2023 STIP. The CTP amount in the 2020-2023 STIP is \$31.67M while the 2024-2027 STIP shows \$35.5M

for FY23 with an increasing amount every year after. The TAP amount in the 2020-2023 STIP is \$2M while the 2024-2027 FY23 amount shows \$2.6M with an increasing amount every year after. AMATS staff reached out to DOT&PF Program Development staff for follow up and received an explanation for this issue. Please confirm what the amount is supposed to be in the STIP. AMATS relies on the State to accurately list the allocation amounts to ensure obligations are met each year.

6. Per 23 CFR 450.218 (k) "Each project or project phase included in the STIP shall be consistent with the long-range statewide transportation plan developed under § 450.216 and, in metropolitan planning areas, consistent with an approved metropolitan transportation plan developed under § 450.324". The following projects in the 2024-2027 STIP and are not included in the approved AMATS 2040 MTP:
 - a. #34164 Seward Highway Milepost 98.5-110 Reconstruction
 - b. #34191 Port of Alaska Tract-J Access Road
 - c. #34171 Glenn Highway Incident Management and Traffic Accommodations
 - d. #31846 Glenn Highway and Hiland Road Interchange Preservation and Operational Improvements

Since projects must be included in the approved MPO MTP prior to being included in the STIP, these projects should be removed from the 2024-2027 STIP. When and if they are included in the 2040 MTP via an amendment they can later be added to the STIP through an amendment.

Technical Comments:

1. Seward Highway 98.5 to 110 should be all in the Municipality of Anchorage not Kenai. Also this project is missing from the interactive map.
2. Why is there a match amount of 6.60% for some of the NHPP? Is this available for everyone to use? AMATS was always led to believe 9.03% is lowest match rate possible for federal transportation funding.
3. Why are Anchorage projects listed in the Anchorage/Mat-Su areas for borough and census? Anchorage and Mat-Su have their own census areas and own boroughs. This is a pretty big issue especially for AMATS specific funding like the CTP/TAP/CMAQ/CRP which are limited to the AMATS area and this designation makes it seem like it can be used in the Mat-Su area.
4. Several projects in the STIP are listed as Anchorage/Mat-Su while they are only in Anchorage or Mat-Su area. This a pretty common issue with a lot of projects in the STIP

tables and should be looked at document wide.

5. Are strategic investment areas only limited to one per project? How were these chosen for each project?
6. Recommend changing the non-AMATS MPO designation on certain projects to instead have one for FAST and one for MVP pre-MPO once the funding distribution is figured out. Right now it is confusing to find the specific information for the other MPOs and almost appears adversarial with how it is listed.
7. There is no acronyms list for the funding codes. Please provide this list.
8. In the overall STIP document and the reoccurring documents there are ACC, however there is no ACC in the funding codes for the projects. The past STIP had AC and ACC for a project in one location so you could see everything in one glance. It is less transparent and cumbersome to have them split into separate locations and documents.
9. AMATS CTP is confusing. It should be STBG, as having it listed as CTP makes it seem like AMATS participates in the CTP program which DOT&PF prohibits us from doing.
10. The overall STIP website and documents do not appear to have been finished before being posted. There are numerous errors and technical issues, some are being fixed during the comment period and others not at all. It is very confusing from a public comment perspective on what is going on. For example, the public comment period was not initially on the website and was later added. It now says the comment period ends September 3rd, but in the STIP document starting on page 296 of the PDF it says the comment period is open until September 29th, 2023. While it is understandable sometimes changes have to be made on the fly, this is a problem when trying to draft comments.

Thank you again for the opportunity to comment on the 2024-2027 STIP. AMATS looks forward to the responses on these comments. If you have any questions please don't hesitate to contact me at aaron.jongenelen@anchorageak.gov or (907) 575-6232.

Sincerely,

Aaron Jongenelen
AMATS Executive Director/MPO Coordinator

Electronic Cc:

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