



September 13, 2023

Alaska Department of Transportation & Public Facilities
Division of Program Development
P.O. Box 112500, Juneau, Alaska 99811-2500

Subject: Draft FFY2024-27 Statewide Transportation Improvement Program (STIP) Comments

To whom it may concern:

Thank you for the opportunity to comment on the Draft FFY2024-27 STIP. Below are comments from Fairbanks Area Surface Transportation (FAST) Planning, which is the State-designated Metropolitan Planning Organization (MPO) for the Fairbanks and North Pole area.

1. **General Comment** – FAST Planning would like to applaud Alaska DOT&PF for their work on developing and releasing the Draft FFY2024-27 STIP in multiple, interactive formats. This allows a broader audience the ability to explore, analyze, and digest the information in the STIP in different ways. Thank you for all your hard work in making the STIP more accessible and engaging with the public, which greatly improves the review process.

With that said, however, FAST Planning would like to express our reservation that the STIP appears to have been developed internally without meaningful input from stakeholders throughout the State. In accordance with 23 CFR 450.218 and 23 USC 135(g)(2) the State shall develop the STIP in coordination and cooperation with MPOs, Regional Planning Organizations (RPOs), nonmetropolitan local officials, and tribal entities. These consultations did not occur while the STIP was being developed; rather, the STIP appears to have been prepared internally and published for a 45-day public comment period as the sole opportunity to begin engaging with the Alaska DOT&PF on regional project priorities.

The STIP is the most important document the Alaska DOT&PF produces as it reflects funding decisions for how Alaska's Federal transportation funding apportionments (\$700+ million annually) will be spent throughout the State. The lack of engagement with MPOs, RPOs, nonmetropolitan local officials, and tribal entities throughout the State during development of the STIP raises concern the STIP does not reflect the priorities of these stakeholders. If this engagement had occurred, the list of projects and programs included in the STIP would

likely look very different from the version published for public comment. There also does not appear to be any direct outreach conducted or planned for rural communities throughout the State, which host a high percentage of the State's low income and minority populations. In consideration of the importance of the STIP document and Title VI and Environmental Justice (E.O. 12898) provisions, FAST Planning encourages a more robust consultation and engagement effort be carried out by the Alaska DOT&PF from the very beginning to end of the STIP development process.

2. **Public Participation Plan** – the publication and public comment period for the Draft STIP does not appear to include targeted outreach efforts to engage interested parties throughout the State other than electronic notification through the Alaska DOT&PF website and State's Online Public Notice system. And while we acknowledge open house events were held in Anchorage, Fairbanks, and Juneau, attendance was reported to be very low. FAST Planning staff attended the open house event in Fairbanks and not a single member of the public attended the two-hour meeting. Is there a Public Participation Plan for the STIP publication and public comment period? Considering the importance of this document, which shows how billions of Federal transportation dollars will be spent throughout the State over the next four years, a robust public outreach and engagement effort should have been carried out. The current process makes the appearance Alaska DOT&PF is not seeking meaningful input on these transportation funding decisions from interested parties throughout the State.
3. **Selection Process for New Projects in the STIP** – there appears to be missing information in the Draft STIP about how new projects were selected for inclusion in the STIP. Who serves on the Project Evaluation Board, what data/scoring criteria were used to select certain projects over other projects, and why was this process not open to the public for input? FAST Planning relies on a robust project selection process that is open to the public with multiple opportunities for input during the nomination period, project review and scoring stage, and final selection/approval for all new projects to be included in the TIP. We would encourage a similar robust project selection process for the STIP that is not only transparent, but also provides meaningful opportunity for public input.
4. **New Projects within MPO Boundaries** – there are new projects in the STIP within both the Fairbanks and Anchorage MPO boundaries that are not included in our Metropolitan Transportation Plans (MTPs) or TIPs. In accordance with 23 CFR 450.218(b) & (k) and 23 USC 135(g)(5)(D), all projects in the STIP located within MPO Boundaries must be included in the MTPs and TIPs before they are added to the STIP. Summarily, these new projects cannot move forward in the STIP without Amendments to the MPOs' MTPs and TIPs, which will require an additional 30-day public comment period and MPO Policy Board approval. In this instance, Alaska DOT&PF has two options: (1) remove the new projects in the STIP that are not included in our MTPs and TIPs, or (2) request a 180-day deadline extension from FHWA and FTA on the STIP approval to provide time to complete the MTP and TIP

Amendments. If the extension request is the desired option for Alaska DOT&PF, note that 23 CFR 450.220(c) requires concurrence from both MPOs so our respective Policy Boards need to be notified of this request as soon as possible. The two new projects within the Fairbanks MPO boundary that are not included in our MTP or TIP are the following:

- a. Steese Highway MP 5 Bridge Replacement (34128)
- b. Richardson Highway MP 346 Northbound Chena Bridge Replacement (34130)

FAST Planning has worked closely with Alaska DOT&PF and our local governments over the past year and a half on the latest updates to our MTP and TIP, both of which were finalized in January 2023 and adopted in March 2023 following completion of our air quality conformity analysis. Throughout this process Alaska DOT&PF staff did not mention the existence of these two projects or request they be added to our MTP and TIP. The first time FAST Planning learned of the projects was through Alaska DOT&PF's press release on February 15, 2023, which highlighted their addition to the Governor's Amended Capital Budget. However, there was no call to action at that time from Alaska DOT&PF to amend our MTP and TIP to include these projects prior to adoption on March 15th.

Reference: <https://dot.alaska.gov/comm/pressbox/arch2023/PR23-0005.shtml>

Nevertheless, if Alaska DOT&PF would now like the Fairbanks MPO to complete MTP and TIP Amendments to include these two projects, please note that time is of the essence. The U.S. EPA is likely to issue a Conformity Freeze for our area with the EPA's pending partial disapproval of the State's Implementation Plan for the PM_{2.5} Non-attainment Area. The Conformity Freeze could take effect as early as October or November this year, and in a Conformity Freeze the MPO will not be allowed to make Amendments to the MTP and TIP. FAST Planning would appreciate a meeting with the Commissioner's Office on this issue as it will significantly affect both the MPO and Alaska DOT&PF's project delivery process moving forward with these and other projects.

5. **Richardson Highway MP 346 Northbound Chena Bridge Replacement (34130)** – FAST Planning questions the need and funding source for this project. At the July 26 and August 3, 2023, Transportation Advisory Committee meetings for the "Alaska Richardson Steese Highways Corridor Action Plan" State bridge engineers indicated a one percent (1%) weight reduction on the axles of 165,000-lb ore haul trucks would meet the load limits of this bridge. If this is the case, does the bridge actually need to be replaced? If not, the \$31 million set aside for this project could potentially be used for other freight needs statewide. Also, FAST Planning would like to note that the proposed funding for the project is National Highway Freight Program (NHFP) funding. Page 18 of the "STIP in Print" states NHFP funds will be used on projects listed in Alaska's Statewide Freight Plan, which was approved and adopted by the State in January 2023. Looking at the Freight Investment Plan, however, the

“Richardson Highway MP 346 Northbound Chena Bridge Replacement” project is not included in the list of projects approved for use with NHFP funding. See https://alaskamoves2050.com/wp-content/uploads/2023/01/25697-Alaska-FP-Appendix-J-Freight-Investment-Plan-Illustrative-Listing-of-Projects_122222.pdf.

6. **Financial Summary** – Federal (23 USC 135) and State (17 AAC 05.190) regulations require the STIP to include a financial summary that demonstrates the implementation strategy and fiscal constraint for funding reasonably anticipated to be available for the projects within the timelines contemplated for completion of the projects. However, the Draft STIP does not include a financial summary to demonstrate the implementation strategy and/or fiscal constraint. The public should be able to readily see where this funding is being invested throughout Alaska and whether or not the STIP is under- or over-programmed with respect to its projects and funding apportionments, including totals for use of “Advance Construction (AC)” funding that is borrowed from future years’ apportionments to accelerate project delivery.
7. **Performance Measures** – 23 USC 135(g)(4) requires the STIP to include, to the maximum extent practicable, a discussion of the anticipated effect of the STIP towards achieving the performance targets established in the statewide transportation plan, linking investment priorities to those performance targets. The Draft STIP, however, does not link its investment priorities to the Alaska DOT&PF’s Performance Targets; rather it links projects to Alaska DOT&PF’s new vision for “Strategic Investment Areas.” With the most recent MTP and TIP development efforts by the Fairbanks and Anchorage MPOs, FHWA and FTA provided written corrective action comments to both MPOs to link our investment priorities to Alaska DOT&PF’s Performance Targets. We expect FHWA and FTA will make the same finding for the Draft STIP that will require correction action.
8. **Informational Tables** – for the “Pavement & Bridge Preservation Program (34302)” and “Highway Safety Improvement Program (19217),” FAST Planning requests informational tables be added to the STIP to list the projects being funded each fiscal year under these programs so the public can view and provide comment on the projects anticipated for each year. The STIP is an important resource for the public and outside agencies and organizations to review and comment on how Alaska’s Federal transportation funding apportionments are being spent throughout the state, and detailing the PBPP- and HSIP-funded projects would assist in transparency and allow for the public to more easily locate and comment on projects they are interested in.
9. **Investment on the Sterling & Seward Highways** – during development of the previous FFY2020-23 STIP, FAST Planning expressed concern about the cost of the \$350+ million Sterling Highway MP 8-25 project, which was the largest multi-year construction project in the STIP and reserved a significant percentage each year of Alaska’s Federal funding

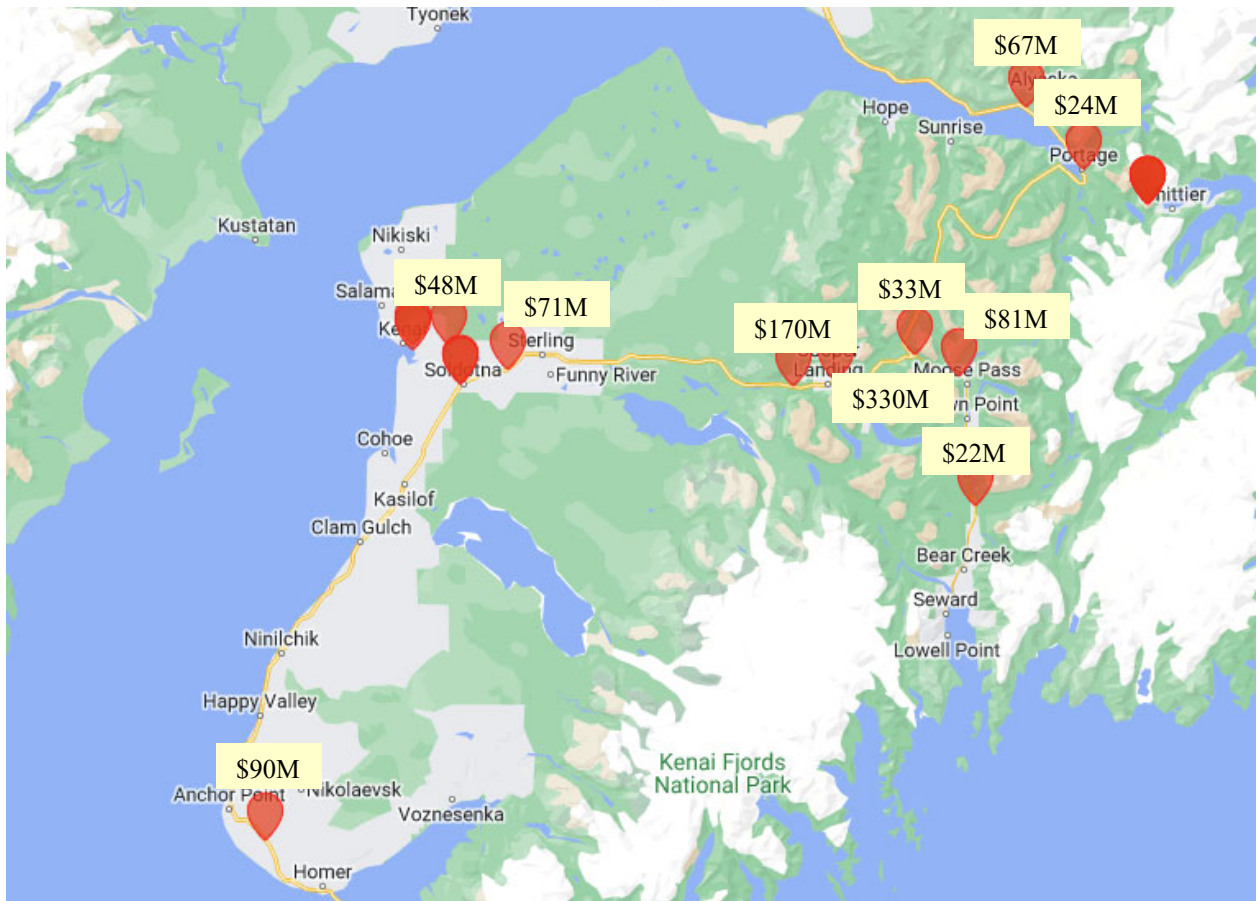
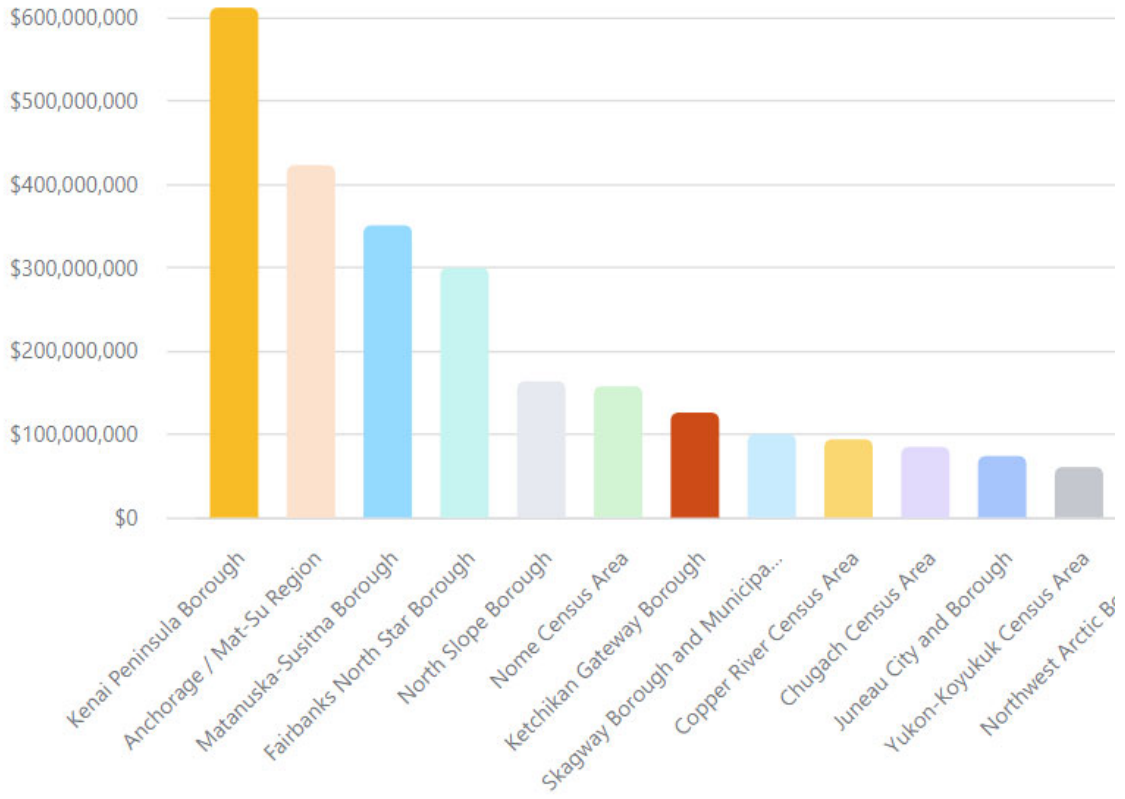
apportionments for transportation projects throughout the State. Looking at the new FFY2024-27 STIP there are even more “mega projects” on the Sterling and Seward Highways totaling \$600+ million for a bundle of highway projects that are relatively short in length. In addition, the largest project in this bundle [Sterling Highway MP45-60 Reconstruction & Alignment] only shows a cost estimate of \$330 million in the STIP, but Alaska DOT&PF issued a press release on July 21, 2023 (the day after releasing the STIP), stating this project’s cost has now escalated to \$840 million. The new cost estimate is not reflected in the STIP, nor does the STIP account for which unrelated projects will have to be removed from the STIP to maintain fiscal constraint to cover the cost of this increase.

Cost estimates for completion of the Cooper Landing Bypass are as follows:

- In 2018, the project cost estimate was \$350M
- In 2021, the project cost estimate was \$499M
- In 2022, the project cost estimate was \$690M
- In 2023, an assessment estimated that the project costs were \$840M.

Reference: <https://dot.alaska.gov/comm/pressbox/arch2023/PR23-0024.shtml>

This raises the bar to over a billion-dollar investment on the Kenai Peninsula that appears to be for rural highways that primarily serve recreational users from Anchorage and places the STIP out of balance with competing priorities throughout the State (especially when the State’s Federal apportionment is ~\$700 million annually). This type of investment would be more appropriately made in the MatSu region of the State, for example, which has the fastest growing population of any region in the State. Greater investments in rural communities off the main road system would also be a more appropriate use of these funds since they have a large amount of unmet transportation needs and limited/no voice at the table in the STIP development process. To better understand Alaska DOT&PF’s internal decision-making process on development of this STIP, FAST Planning’s Technical Committee and Policy Board request a presentation from Alaska DOT&PF on how they think the new STIP is balanced and equitable in meeting statewide needs.



10. **Air Quality Planning** – provided Fairbanks and North Pole are located within a Serious PM2.5 Non-attainment Area and facing a potential disapproval of the State’s Implementation Plan for Air Quality by the EPA, FAST Planning supports the continued funding for air quality programs in the STIP that directly support our efforts towards attainment of national air quality standards. Specifically, we support continued funding for the following programs:

Need ID Project Name

| | |
|-------|---|
| 26168 | Air Quality Mobile Source Modeling |
| 26161 | Air Quality Planning Project: Fairbanks |
| 20294 | Air Quality Public Education |
| 29232 | State Implementation Plan Committed Measures |
| 18791 | Congestion Mitigation & Air Quality Improvements: Statewide |

11. **NEW: Light Up the Highways (34198)** – this project provides \$5 million annually to convert existing highway lighting systems to LED technology. While FAST Planning supports this project, we have questions and comments about the funding source and match rate.

- a. The primary funding source is listed as Carbon Reduction Program funds, however, the detailed funding table shows 100% of the Federal funds are Flexible Congestion Mitigation & Air Quality (CMAQ) funds. What is the actual funding source?
- b. If the funding source is CMAQ funds, FAST Planning would like to note that from a previous eligibility review conducted by FHWA in 2019, FHWA stated LED lighting conversions were not eligible for CMAQ funds because they do not reduce mobile source emissions.
- c. If the funding source is Carbon Reduction Program funds, LED lighting conversions are eligible for use of these funds [23 USC 175(c)(F) - Projects to replace street lighting and traffic control devices with energy-efficient alternatives]. However, the Alaska DOT&PF is currently developing their Carbon Reduction Program Strategy, which must be approved by FHWA by November 15th, and LED lighting conversions are not currently proposed in this plan because they have limited carbon reduction benefit compared to other projects that reduce idling, improve traffic flow, support conversion of vehicles to alternative fuels/energy, increase transit ridership, and/or reduce single-occupancy vehicle trips.
- d. The match rate shows 80% Federal funds and 20% local/State match; however, the match rate should be 90.97% Federal funds and 9.03% local/State match.
- e. Provided the issues with the funding source, FAST Planning recommends the Alaska DOT&PF choose an alternative funding source such as Surface Transportation Program Block Grant (STPBG) funds for this project.

12. **NEW: Sustainable Transportation & Energy Program (34199)** – this appears to be a new program established by Alaska DOT&PF with \$12 million in annual Carbon Reduction Program and CMAQ funding; however, the project description does not provide details on what specific projects it will fund and/or if there will be a community project nomination process. For the benefit of the public reviewing the STIP, please provide more information in the description on the project selection process for this funding.

13. **NEW: Other New Programs** – similar to the previous comment (#7 above), the project descriptions for these new programs do not provide details on what specific projects they will fund and/or if there will be a community project nomination process. For the benefit of the public reviewing the STIP, please provide more information in the descriptions on the project selection process for these funding opportunities.

| Need ID | Project Name | Funding | Fund Source |
|---------|--|----------------|-------------|
| 34260 | Waysides Program | \$ 49,000,000 | STPBG, NHPP |
| 34190 | Waterways Program | \$ 9,400,000 | STPBG |
| 34259 | Rural Community Connections Program | \$ 172,500,000 | STPBG, NHPP |
| 34257 | Housing Roads Program | \$ 65,000,000 | STPBG |
| 34258 | Frontier Road, Trails, & Bridges Program | \$ 197,200,000 | STPBG |
| 33860 | Resiliency Program | \$ 114,000,000 | PROTECT |

14. **Congestion Mitigation & Air Quality Improvements: Non-AMATS MPOs (17663)** – the “Non-AMATS MPOs” title and project description indicate this includes funding for both small MPOs in Alaska (Fairbanks and MatSu); however, it is unclear how much of this funding will go to each MPO. Provided the STIP is a planning document it is critically important this table in the STIP reflects the suballocation amounts of CMAQ funding to the two MPOs separately so each MPO can appropriately program funds to projects in their respective TIPs.

15. **Metropolitan Planning Organization (MPO) Planning (6448)** – the funding table does not reflect the Federal funding amounts shown in the current (FFY2023) and future year Apportionment Tables from FHWA and FTA. It also does not reflect the addition of FTA 5303 funds included with the new MPO Consolidated Planning Grant as outlined in the project description. The table needs to be updated to match the amounts show on the following page, minus any obligation limitation on Metro PL funds.

| Metro PL | Actual FFY2023 | Estimated FFY2024 | Estimated FFY2025 | Estimated FFY2026 |
|-----------------|---------------------------|------------------------------|------------------------------|------------------------------|
| Federal | \$ 3,051,054 | \$ 3,112,075 | \$ 3,174,317 | \$ 3,237,803 |
| Match | \$ 302,858 | \$ 308,915 | \$ 315,094 | \$ 321,396 |
| | \$ 3,353,912 | \$ 3,420,990 | \$ 3,489,411 | \$ 3,559,199 |

| FTA 5303 | Actual FFY2023 | Estimated FFY2024 | Estimated FFY2025 | Estimated FFY2026 |
|-----------------|---------------------------|------------------------------|------------------------------|------------------------------|
| Federal | \$ 620,606 | \$ 636,811 | \$ 649,966 | \$ 666,489 |
| Match | \$ 61,604 | \$ 63,212 | \$ 64,518 | \$ 66,158 |
| | \$ 682,210 | \$ 700,023 | \$ 714,484 | \$ 732,647 |

| | | | | |
|---------------------------|---------------------|---------------------|---------------------|---------------------|
| Combined Total | \$ 4,036,122 | \$ 4,121,013 | \$ 4,203,895 | \$ 4,291,846 |
|---------------------------|---------------------|---------------------|---------------------|---------------------|

Reference: [TA Est FY 2022-2026 Apportionments ANS as passed by Senate \(Infrastructure Investment and Jobs Act.xlsx \(dot.gov\); fy-2023-full-year-apportionment-table-2-section-5303-and-5304-statewide-and-metropolitan-planning-01-27-2023.xlsx \(live.com\); 2022-09143.pdf \(govinfo.gov\) \(page 25369; calculated from IJJA 5305\(d\) estimated apportionments with rate increases \(yr-over-yr\) FFY24 - 2.6%, FFY25 - 2.1%, & FFY26 - 2.5%\)](#)

16. **Community Transportation Program: Non-AMATS MPOs (17662)** – the funding table does not reflect the Federal funding amounts shown in the current (FFY2023) and future year Apportionment Tables from FHWA (including the 2% per year increase for STPBG funds). At a minimum, the table needs to be updated to match the following amounts, minus any obligation limitation on STPBG funds:

| STPBG | Actual FFY2023 | Estimated FFY2024 | Estimated FFY2025 | Estimated FFY2026 |
|----------------|---------------------------|------------------------------|------------------------------|------------------------------|
| Federal | \$ 8,249,145 | \$ 8,414,128 | \$ 8,582,410 | \$ 8,754,059 |
| Match | \$ 818,839 | \$ 835,216 | \$ 851,920 | \$ 868,958 |
| | \$ 9,067,984 | \$ 9,249,344 | \$ 9,434,331 | \$ 9,623,017 |

Reference: [FHWA Notice - N4510.876 - FY 2023 Supplementary Tables \(dot.gov\); TA Est FY 2022-2026 Apportionments ANS as passed by Senate \(Infrastructure Investment and Jobs Act.xlsx \(dot.gov\); calculated from STPBG estimated apportionments with rate increase \(yr-over-yr\) of 2% as shown in apportionment tables](#)

The “Non-AMATS MPOs” title and project description also indicate this includes funding for both small MPOs in Alaska (Fairbanks and MatSu); however, the funding table only includes funding for the Fairbanks MPO based on the current FHWA apportionment for one MPO in Alaska in the 50,000 to 200,000 population category under the 2010 Census. The table on the following page reflects the FFY2023 FHWA apportionment, excluding TAP and SPR funds, for the 55% STPBG suballocation to defined population categories.

| 2010 Census Population | | FFY2023 STPBG Suballocation (Existing) | | Per Capita STPBG Funding | |
|-------------------------------|---------|---|---------------|---------------------------------|--------|
| Alaska (Entire State) | 710,231 | Total Apportionment | \$ 90,815,779 | \$ | 127.87 |
| Anchorage Urbanized Area | 251,243 | Areas >200k Population | \$ 32,125,926 | \$ | 127.87 |
| Fairbanks Urbanized Area | 64,513 | Areas 50k-200k Population | \$ 8,249,145 | \$ | 127.87 |
| Areas <50k Population | 394,475 | Areas <50k Population | \$ 50,440,708 | \$ | 127.87 |

With the upcoming designation of the new MPO in the MatSu region, the Federal formula used in the FHWA apportionment table will need to be applied to include the MatSu population and its per capita STPBG funding in the 50,000 to 200,000 population category under the 2020 Census. The table on below reflects the revised FFY2023 FHWA apportionment with the addition of the new MPO in MatSu.

| 2020 Census Population | | FFY2023 STPBG Suballocation (Proposed) | | Per Capita STPBG Funding | |
|-------------------------------|---------|---|---------------|---------------------------------|--------|
| Alaska (Entire State) | 733,391 | Total Apportionment | \$ 90,815,779 | \$ | 123.83 |
| Anchorage Urbanized Area | 249,252 | Areas >200k Population | \$ 30,864,875 | \$ | 123.83 |
| Fairbanks Urbanized Area | 71,396 | Areas 50k-200k Population | \$ 8,840,967 | \$ | 123.83 |
| MatSu Urbanized Area | 53,444 | " " " | \$ 6,617,971 | \$ | 123.83 |
| Areas <50k Population | 359,299 | Areas <50k Population | \$ 44,491,995 | \$ | 123.83 |

Based on these calculations under the Federal funding formula, the table in the STIP ultimately needs to be updated to match the following amounts, minus any obligation limitation on STPBG funds:

| STPBG | Actual FFY2023 | Estimated FFY2024 | Estimated FFY2025 | Estimated FFY2026 |
|----------------------------|-----------------------|--------------------------|--------------------------|--------------------------|
| Federal (Fairbanks) | \$ 8,840,967 | \$ 9,017,786 | \$ 9,198,142 | \$ 9,382,105 |
| Federal (MatSu) | \$ 6,617,971 | \$ 6,750,330 | \$ 6,885,337 | \$ 7,023,044 |
| Match | \$ 1,534,508 | \$ 1,565,198 | \$ 1,596,502 | \$ 1,628,432 |
| | \$16,993,446 | \$17,333,315 | \$17,679,981 | \$ 18,033,581 |

The timing of updating this table may be contingent upon the State's official designation of the new MPO in MatSu and development of their initial Long Range Transportation Plan and TIP. Nevertheless, FAST Planning would like to express to Alaska DOT&PF that provided the STIP is a planning document it is critically important this table in the STIP reflect the suballocation amounts of STPBG funding to the two MPOs separately so each MPO can

appropriately program funds to projects in their respective TIPs and demonstrate fiscal constraint to FHWA and FTA.

17. **Transportation Alternatives Program: Non-AMATS MPOs (33864)** – similar to the previous comment (#11 above), the funding table does not reflect the Federal funding amounts shown in the current (FFY2023) and future year Apportionment Tables from FHWA (including the 2% per year increase for TAP funds). At a minimum, the table needs to be updated to match the following amounts, minus any obligation limitation on TAP funds:

| TAP | Actual FFY2023 | Estimated FFY2024 | Estimated FFY2025 | Estimated FFY2026 |
|----------------|-------------------|----------------------|----------------------|----------------------|
| Federal | \$ 521,671 | \$ 532,104 | \$ 542,747 | \$ 553,601 |
| Match | \$ 51,783 | \$ 52,819 | \$ 53,875 | \$ 54,952 |
| | \$ 573,454 | \$ 584,923 | \$ 596,621 | \$ 608,554 |

The “Non-AMATS MPOs” title and project description also indicate this includes funding for both small MPOs in Alaska (Fairbanks and MatSu); however, the funding table only includes funding for the Fairbanks MPO based on the current FHWA apportionment for one MPO in Alaska in the 50,000 to 200,000 population category under the 2010 Census. The table below reflects the FFY2023 FHWA apportionment for the defined population categories:

| <u>2010 Census Population</u> | | <u>FFY2023 TAP Suballocation (Existing)</u> | | <u>Per Capita STPBG Funding</u> |
|-------------------------------|---------|---|--------------|-------------------------------------|
| Alaska (Entire State) | 710,231 | Total Apportionment | \$ 5,743,135 | \$ 8.09 |
| Anchorage Urbanized Area | 251,243 | Areas >200k Population | \$ 2,031,624 | \$ 8.09 |
| Fairbanks Urbanized Area | 64,513 | Areas 50k-200k Population | \$ 521,671 | \$ 8.09 |
| Areas <50k Population | 394,475 | Areas <50k Population | \$ 3,189,840 | \$ 8.09 |

With the upcoming designation of the new MPO in the MatSu region, the Federal formula used in the FHWA apportionment table will need to be applied to include the MatSu population and its per capita TAP funding in the 50,000 to 200,000 population category under the 2020 Census. The table below reflects the revised FFY2023 FHWA apportionment with the addition of the new MPO in MatSu.

| <u>2020 Census Population</u> | | <u>FFY2023 TAP Suballocation (Proposed)</u> | | <u>Per Capita STPBG Funding</u> |
|-------------------------------|---------|---|--------------|-------------------------------------|
| Alaska (Entire State) | 733,391 | Total Apportionment | \$ 5,743,135 | \$ 7.83 |
| Anchorage Urbanized Area | 249,252 | Areas >200k Population | \$ 1,951,643 | \$ 7.83 |
| Fairbanks Urbanized Area | 71,396 | Areas 50k-200k Population | \$ 559,031 | \$ 7.83 |
| MatSu Urbanized Area | 53,444 | " " " | \$ 418,467 | \$ 7.83 |
| Areas <50k Population | 359,299 | Areas <50k Population | \$ 2,813,311 | \$ 7.83 |

Based on these calculations under the Federal funding formula, the table in the STIP ultimately needs to be updated to match the following amounts, minus any obligation limitation on TAP funds:

| TAP | Actual FFY2023 | Estimated FFY2024 | Estimated FFY2025 | Estimated FFY2026 |
|--------------------------------|---------------------|----------------------|----------------------|----------------------|
| Federal (Fairbanks) | \$ 559,031 | \$ 570,212 | \$ 581,616 | \$ 593,248 |
| Federal (MatSu) | \$ 418,467 | \$ 426,836 | \$ 435,373 | \$ 444,081 |
| Match | \$ 97,030 | \$ 98,970 | \$ 100,950 | \$ 102,969 |
| | \$ 1,074,528 | \$ 1,096,018 | \$ 1,117,939 | \$ 1,140,298 |

The timing of updating this table may be contingent upon the State’s official designation of the new MPO in MatSu and development of their initial Long Range Transportation Plan and TIP. Nevertheless, FAST Planning would like to express to Alaska DOT&PF that provided the STIP is a planning document it is critically important this table in the STIP reflect the suballocation amounts of TAP funding to the two MPOs separately so each MPO can appropriately program funds to projects in their respective TIPs and demonstrate fiscal constraint to FHWA and FTA.

18. **Carbon Reduction Program: Non-AMATS MPOs (33863)** – similar to the previous comments (#11 and #12 above), the funding table does not reflect the Federal funding amounts shown in the current (FFY2023) and future year Apportionment Tables from FHWA(including the 2% per year increase for CRP funds). At a minimum, the table needs to be updated to match the following amounts, minus any obligation limitation on CRP funds:

| CRP | Actual FFY2023 | Estimated FFY2024 | Estimated FFY2025 | Estimated FFY2026 |
|----------------|---------------------|----------------------|----------------------|----------------------|
| Federal | \$ 947,525 | \$ 966,476 | \$ 985,805 | \$ 1,005,521 |
| Match | \$ 94,055 | \$ 95,936 | \$ 97,854 | \$ 99,812 |
| | \$ 1,041,580 | \$ 1,062,411 | \$ 1,083,659 | \$ 1,105,333 |

The “Non-AMATS MPOs” title and project description also indicate this includes funding for both small MPOs in Alaska (Fairbanks and MatSu); however, the funding table only includes funding for the Fairbanks MPO based on the current FHWA apportionment for one MPO in Alaska in the 50,000 to 200,000 population category under the 2010 Census. The table on the following page reflects the FFY2023 FHWA apportionment for the defined population categories.

| 2010 Census Population | | FFY2023 CRP Suballocation (Existing) | | Per Capita STPBG Funding | |
|-------------------------------|---------|---|---------------|---------------------------------|-------|
| Alaska (Entire State) | 710,231 | Total Apportionment | \$ 10,431,414 | \$ | 14.69 |
| Anchorage Urbanized Area | 251,243 | Areas >200k Population | \$ 3,690,095 | \$ | 14.69 |
| Fairbanks Urbanized Area | 64,513 | Areas 50k-200k Population | \$ 947,525 | \$ | 14.69 |
| Areas <50k Population | 394,475 | Areas <50k Population | \$ 5,793,794 | \$ | 14.69 |

With the upcoming designation of the new MPO in the MatSu region, the Federal formula used in the FHWA apportionment table will need to be applied to include the MatSu population and its per capita CRP funding in the 50,000 to 200,000 population category under the 2020 Census. The table below reflects the revised FFY2023 FHWA apportionment with the addition of the new MPO in MatSu.

| 2020 Census Population | | FFY2023 CRP Suballocation (Proposed) | | Per Capita STPBG Funding | |
|-------------------------------|---------|---|---------------|---------------------------------|-------|
| Alaska (Entire State) | 733,391 | Total Apportionment | \$ 10,431,414 | \$ | 14.22 |
| Anchorage Urbanized Area | 249,252 | Areas >200k Population | \$ 3,544,363 | \$ | 14.22 |
| Fairbanks Urbanized Area | 71,396 | Areas 50k-200k Population | \$ 1,015,251 | \$ | 14.22 |
| MatSu Urbanized Area | 53,444 | " " " | \$ 759,974 | \$ | 14.22 |
| Areas <50k Population | 359,299 | Areas <50k Population | \$ 5,109,232 | \$ | 14.22 |

Based on these calculations under the Federal funding formula, the table in the STIP ultimately needs to be updated to match the following amounts, minus any obligation limitation on CRP funds:

| CRP | Actual FFY2023 | Estimated FFY2024 | Estimated FFY2025 | Estimated FFY2026 |
|----------------------------|-----------------------|--------------------------|--------------------------|--------------------------|
| Federal (Fairbanks) | \$ 1,048,807 | \$ 1,069,783 | \$ 1,091,179 | \$ 1,113,002 |
| Federal (MatSu) | \$ 785,092 | \$ 800,794 | \$ 816,810 | \$ 833,146 |
| Match | \$ 182,039 | \$ 185,680 | \$ 189,394 | \$ 193,181 |
| | \$ 2,015,938 | \$ 2,056,257 | \$ 2,097,382 | \$ 2,139,330 |

The timing of updating this table may be contingent upon the State's official designation of the new MPO in MatSu and development of their initial Long Range Transportation Plan and TIP. Nevertheless, FAST Planning would like to express to Alaska DOT&PF that provided the STIP is a planning document it is critically important this table in the STIP reflect the suballocation amounts of CRP funding to the two MPOs separately so each MPO can appropriately program funds to projects in their respective TIPs and demonstrate fiscal constraint to FHWA and FTA.

19. **Tetlin to Fort Knox Ore Haul** – in the Draft STIP there are a number of new projects along the Alaska, Richardson, and Steese Highway Corridor that not only appear to be new but also set on an accelerated schedule to support the ore haul, which is expected to begin in January 2024. The table below highlights these projects.

| Need ID | Project Name | Estimate | Fund Source |
|---------|---|-----------------------|-------------|
| 34128 | Steese Hwy MP 5 Bridge Replacement (Chena Hot Springs Road crossing) | \$ 12,799,000 | NHPP |
| 34126 | Alaska Hwy MP 1348 Roberston River Bridge Replacement | \$ 64,150,000 | NHPP |
| 33824 | Alaska Hwy MP 1380 Johnson River Bridge Replacement | \$ 38,198,200 | NHPP |
| 22322 | Alaska Hwy MP 1393 Gerstle River Bridge Replacement | \$ 68,100,000 | NHPP |
| 34120 | Richardson Hwy MP 346 Northbound Chena Bridge Replacement | \$ 30,900,000 | NHPP & NHFP |
| 29811 | Richardson Hwy MP 266-341 Passing Lanes | \$ 40,500,000 | NHPP |
| 22315 | Alaska Hwy MP 1221-1422 Passing Lanes (Canadian Border to Delta Junction) | \$ 12,900,000 | NHPP |
| | | \$ 267,547,200 | |

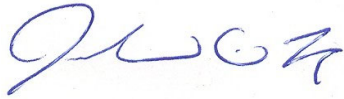
While FAST Planning supports all of these projects, we are concerned Alaska DOT&PF is making planning decisions and spending large amounts of funding without the input of the Transportation Advisory Committee. The main role of the Committee is to recommend policy goals and investment priorities, address the impacts (safety and mobility) of increased corridor usage, and provide recommendations on needs, infrastructure improvements, route alternatives, additional studies, policy/law changes, and funding/partnership opportunities. This work has not yet been accomplished, however, by the Committee, which is tasked with producing a Corridor Action Plan by the end of the year. The concern is the Committee’s recommended investment priorities and proposed infrastructure improvements in the Plan may differ greatly from the list of projects shown in the STIP. For example, at their last meeting on July 26 the Committee discussed mitigation strategies and projects to improve safety at the school bus stops along the Corridor, which is not addressed by the current list of projects in the STIP. In addition, in a presentation by Alaska DOT&PF to the Committee they learned that three of the five bridges have nearly 25 years left of fatigue life even with the ore haul occurring over the next five years. The Alaska DOT&PF’s consultant, Kinney Engineering, also noted an anticipated \$10 million per year increase in additional maintenance costs from the wear and tear of the ore haul trucks, but this need has not been addressed in the STIP. FAST Planning therefore asks Alaska DOT&PF to better engage with the Committee to align any new projects in the STIP with their Corridor Action Plan, which will be drafted later this year for public review and comment.

20. **Peger Road Corridor Study** – Alaska DOT&PF Northern Region Office requested funding in the new STIP for this Corridor Study, but we were not able to locate it in the STIP. Is this project funded under the “Statewide Planning & Environmental Linkages (PEL) Studies Program (31597)”? This Corridor Study is a high priority for FAST Planning as documented in our MTP and TIP and we respectfully request Alaska DOT&PF provide the funding needed in the new STIP for this project.

21. **Minnie Street/Noyes Slough Bridge Replacement** – FAST Planning respectfully requests the addition of the subject project in the STIP. This State-owned bridge (#0295) is the only bridge within the MPO’s boundary still classified in “Poor” condition. The bridge is structurally deficient and functionally obsolete and listed as a high priority in FAST Planning’s MTP. FAST Planning is currently funding the design and construction of the Minnie Street Upgrade project (31389) at a cost of \$14.7 million. Provided the construction phase for this project far exceeds our MPO’s annual allocation of Federal highway funding, the bridge component could not be afforded. With the Minnie Street Upgrade project currently in design and not planned for construction until 2026, however, this would be the ideal time to include the bridge in the design and construction effort for cost efficiency of bundling these two projects together. There is also precedent in the STIP for this type of bridge replacement project being funded by Alaska DOT&PF rather than the MPO with the Aurora Drive/Noyes Slough Bridge Replacement project (26076), which is funded in the current STIP and currently under construction.
22. **Geist Road Pedestrian Bridge Replacement** – Alaska DOT&PF recently demolished the State-owned pedestrian overpass on Geist Road in Fairbanks on August 16, 2023, due to a truss member failure. However, there is no apparent plan to replace it. See https://www.newsminer.com/news/local_news/geist-road-pedestrian-overpass-demolished-early-wednesday/article_1dcb774c-3b05-11ee-8534-8f8cffb55660.html. The STIP should include funding for a new ADA-compliant pedestrian overpass or other crossing treatment such as a high-intensity activated crosswalk beacon (HAWK) for West Valley & Hutchison High School students. Having a safe crossing at this location is critical for these students which frequent lunch/food venues across the high speed, five-lane roadway on a daily basis, as well as those students who live in the neighborhoods across the street that are not afforded bus service due to their proximity (less than one mile) to the school. Considering the significant safety concern with no longer having this overpass, we recommend Alaska DOT&PF explore using a portion of their mandatory 15% set aside of Highway Safety Improvement Program funds for Vulnerable Road Users to cover the cost of this bridge replacement.

Thank you again for the opportunity to comment on the Draft FFY2024-27 STIP, and we look forward to your responses to these comments. If you have any questions or need any additional information, please contact me at jackson.fox@fastplanning.us or (907) 590-1618.

Sincerely,



Jackson C. Fox

Executive Director, FAST Planning

Copy: Julie Jenkins, FHWA Alaska Division Office
Ned Conroy, FTA Region 10

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