



July 18<sup>th</sup>, 2024

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

Subject: 2024-2027 STIP Amendment #1 Comments

Dear Commissioner Anderson,

The AMATS Policy Committee approved these comments on the draft STIP amendment #1 that was released on July 3<sup>rd</sup>, 2024:

- 1) In the “Adopted by Reference” chapter the AMATS 2040 MTP is included, and it should be removed. DOT&PF does not adopt the MTP. DOT&PF participates in the approval process of the AMATS MTP by having representation on the TAC and PC. The MTP and STIP are two separate types of documents, one is a long-range plan and the other is a funding program and it is not appropriate for the MTP to be included in the STIP. If there is a desire to reference the MTP in the STIP that can be done via text and should reference the most recent version, the 2050 MTP.
- 2) AMATS Metro and 5303 Planning Funds are shown in the STIP without being in the TIP and should be removed. At the last MPO quarterly meeting, with the MPO staff and DOT&PF, it was agreed upon that all PL funding will not be shown in the STIP and only included in the work programs.
- 3) There are projects shown in the STIP within the AMATS MPO boundary that are not included in the TIP. This goes against the Tier One corrective action #1 provided to DOT&PF on the original STIP. The projects that are not in the TIP are as follows:
  - Project #33683 Abbott Road Pavement Preservation: New Seward Highway to Lake Otis Pkwy
  - Project #34635 Glenn Highway and Artillery Road Interchange Improvements
  - Project #31846 Glenn Highway and Hiland Road Interchange Preservation and Operational Improvements
  - Project #31839 Glenn Highway Incident Management and Traffic Accommodations
  - Project #31274 Glenn Highway Milepost 1-34 Rehabilitation: Airport Heights to Parks Highway [Parent and Final Construction]
  - Project #34170 Glenn Highway Milepost 1-34 Rehabilitation: Airport Heights to Parks Highway [Stage 2]



- Project #34169 Glenn Highway Milepost 1-34 Rehabilitation: Airport Heights to Parks Highway [Stage 1]
  - Project #33686 Muldoon Road Pavement Preservation
  - Project #12641 Seward Highway Milepost 98.5 to 118 Bird Flats to Rabbit Creek [Parent and Final Construction]
  - Project #34164 Seward Highway Milepost 98.5 to 118 Bird Flats to Rabbit Creek [Stage 1]
  - Project #34165 Seward Highway Milepost 98.5 to 118 Bird Flats to Rabbit Creek [Stage 2]
- 4) The following errors were found on the Ledger page included in Volume 1 for AMATS:
- PL funds are shown on this page and these are not in the TIP. These should be removed.
  - FY27 is not part of the current 23-26 TIP and funding amounts should be removed from this page or shown as illustrative.
- 5) The following errors were found in the “Compiled STIP Fiscal Constraint” document for AMATS:
- Currently FY27 is not part of the 23-26 TIP. Any FY27 programmed funding shown in this document should be zeroed out as it is not programmed in the TIP.
  - PL funds (AMATS Metro and 5303) are shown in this table and should be removed. Fiscal constraint for these funds is done as part of the approved work program.
  - 5307-ARRC in AMATS for FY24, 25, and 26 programmed amounts do not match up with the Ledger page nor with TIP amendment #2. The amounts are above what is programmed in the TIP.
  - Section 5337 State of Good Repair (Anchorage Area Transit) (ARRC in AMATS Boundary) FY25 and 26 programmed amounts do not match up with the Ledger page nor with TIP amendment #2. The amounts are above what is programmed in the TIP.
  - The CMAQ Flex suballocation amounts for FY24, 25, and 26 are above the amount that AMATS was told as part of the coordination process and nothing was communicated as part of the TIP amendment #2 that the CMAQ funding for AMATS has been increased. Please confirm what the suballocation amount is for AMATS for CMAQ flex.
  - The NHPP FY24, 25, and 26 funding shown does not match up with the Ledger page nor TIP amendment #2. FY27 is outside the fiscal years of the TIP and should be zeroed out for any programmed funding.
  - AMATS Surface Transportation Block Grant: Population >200K for FY24 and FY26 does not match up with the Ledger page nor the TIP amendment #2.
  - AMATS Transportation Alternatives Program: Population >200K for FY24 and FY25 does not match up with the Ledger page nor the TIP amendment #2.
  - Carbon Reduction Program: Population >200K for AMATS is missing.



- 6) There are large amounts of Advanced Construction (AC) for projects being shown as part of the STIP amendment #1 without an equivalent amount of Advanced Construction Conversions (ACC) being shown to cover the AC. For example:
  - a. Project #34164 Seward Highway Milepost 98.5 to 118 Bird Flats to Rabbit Creek, stages 1 and 2, shows NHPP AC total of around \$280M (\$140M in FY25 and \$140M in FY27) with only \$5M shown in ACC on the project pages.
  - b. There appears to be over \$900M in AC for FY24-27 outlined in the “Compiled STIP Fiscal Constraint” document without the associated ACCs being shown. The AC balance shown in the STIP Amendment #1 narrative for FY24 is \$451M with no conversions shown in the Fiscal Constraint document. This means there could be over \$1B in AC on the books for Alaska by the end of FY27. How the STIP is structured makes it hard to see how projects are being paid for with AC/ACC and how the STIP fiscal constraint is being met.

This amount of AC/ACC severely limits flexibility for funding future projects.

- 7) Providing comments on the STIP via the website is not fully working. When going to: [2024-27 STIP - Alaska Department of Transportation and Public Facilities \(publicinput.com\)](https://publicinput.com/2024-27-STIP-Alaska-Department-of-Transportation-and-Public-Facilities) it provides a list of all projects in the STIP and when you go to use the filter it doesn't work. For example, when you filter for the Anchorage/Mat-Su regions you get projects out in the Yukon-Koyukuk Census Area.
- 8) There are a number of Tier II corrective actions that needed to be addressed prior to or as part of this STIP amendment. What is the status of those corrective actions? There is no information provided on the STIP website or in the STIP narrative explaining the Tier II correctives actions and how they have been addressed.
- 9) There is no summary of changes provided as part of this STIP amendment #1. Providing a memo outlining all the changes would help with the review.

Sincerely,

Aaron Jongenelen  
AMATS Executive Director/MPO Coordinator

CC:  
AMATS Policy Committee  
Federal Highway Administration  
Federal Transit Administration  
State Legislators representing Districts within AMATS