



August 23, 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.

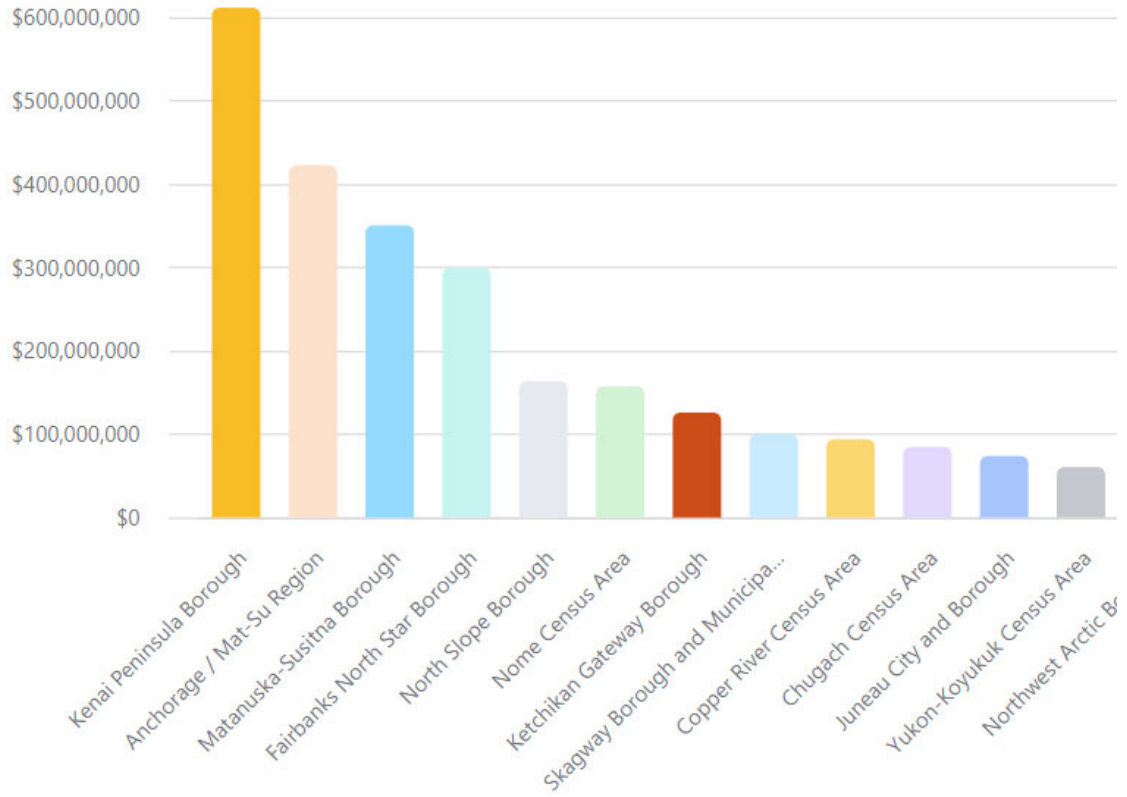
1. **General Comment** – FAST Planning would like to applaud Alaska DOT&PF for their work on developing and releasing the Draft FFY2024-27 STIP in multiple, interactive formats. This allows a broader audience the ability to explore, analyze, and digest the information in the STIP in different ways. Thank 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. Under 23 CFR 450.218 the State shall develop the STIP in coordination and cooperation with MPOs, Regional Planning Organizations (RPOs), nonmetropolitan local officials, and tribal entities. This type of consultation does not appear to have occurred while the STIP was being developed; rather, the STIP was 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. **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.
  
3. **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. This billion-dollar investment on the Kenai Peninsula 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.



4. **M/V Tustumena Replacement Vessel** – the Draft STIP shows \$350 million in funding for replacement of this State Ferry. The Federal funding source is Offsets. What is the source of these Offsets and why are they being used to initiate the design and construction of a State Ferry? Offsets are typically reserved for increases on existing projects and generally fund escalation in construction costs, which Alaska has been experiencing at a rapidly increasing rate. FAST Planning was also under the impression that Offsets cannot be used to fund new project starts, so we would like Alaska DOT&PF to request clarification on this from FHWA. Considering the challenges that Alaska DOT&PF is facing with escalation in construction costs, this project does not feel like an appropriate use of Offset funds.
  
5. **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

6. **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 15<sup>th</sup>, 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.

7. **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.

8. **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

9. **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.

10. **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 following amounts, minus any obligation limitation on Metro PL funds:

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

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

<b>Combined Total</b>	<b>\$ 4,036,122</b>	<b>\$ 4,121,013</b>	<b>\$ 4,203,895</b>	<b>\$ 4,291,846</b>
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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%)

11. **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:

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

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 below reflects the FFY2023 FHWA apportionment, excluding TAP and SPR funds, for the 55% STPBG suballocation to defined population categories.

<u>2010 Census Population</u>		<u>FFY2023 STPBG Suballocation (Existing)</u>		<u>Per Capita STPBG Funding</u>
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.

<u>2020 Census Population</u>		<u>FFY2023 STPBG Suballocation (Proposed)</u>		<u>Per Capita STPBG Funding</u>
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:

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

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.

12. **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
<b>Federal</b>	\$ 521,671	\$ 532,104	\$ 542,747	\$ 553,601
<b>Match</b>	\$ 51,783	\$ 52,819	\$ 53,875	\$ 54,952
	<b>\$ 573,454</b>	<b>\$ 584,923</b>	<b>\$ 596,621</b>	<b>\$ 608,554</b>

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 on the next page 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:

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

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.

- 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:

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

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.

<b>2010 Census Population</b>		<b>FFY2023 CRP Suballocation (Existing)</b>		<b>Per Capita STPBG Funding</b>
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 on below reflects the revised FFY2023 FHWA apportionment with the addition of the new MPO in MatSu.

<b>2020 Census Population</b>		<b>FFY2023 CRP Suballocation (Proposed)</b>		<b>Per Capita STPBG Funding</b>
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:

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

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.

14. **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
22299	Alaska Hwy MP 1235-1268 Rehabilitation & New Passing Lanes	\$ 34,200,000	NHPP
		<b>\$ 301,747,200</b>	

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 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.

15. **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 Long-Range Transportation Plan and TIP and we respectfully request Alaska DOT&PF provide the funding needed in the new STIP for this project.
16. **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 2045 Metropolitan Transportation Plan. 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.

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](mailto:jackson.fox@fastplanning.us) or (907) 590-1618.

Sincerely,

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**Jackson C. Fox**

Executive Director, FAST Planning

Copy: FAST Planning Policy Board

Mayor Bryce Ward, Fairbanks North Star Borough

Mayor David Pruhs, City of Fairbanks

Mayor Michael Welch, City of North Pole

Jerry Cleworth, Council Member, City of Fairbanks

Brett Rotermund, Assembly Member, Fairbanks North Star Borough

Jason Olds, Air Quality Division Director, Alaska Dept. of Environmental Conservation

Joe Kemp, Northern Region Director, Alaska Dept. of Transportation & Public Facilities