Alaska

2024-2027 Statewide Transportation Improvement Program

Federal Planning Finding

Introduction

Federal Highways Administration (FHWA) and Federal Transit Administration (FTA) are required to make a joint Federal Planning Finding (FPF) on the extent to which the transportation planning processes through which statewide transportation plans and programs are developed is consistent with 23 U.S.C. 134 and 135 (for FHWA) and 49 U.S.C. 5303 and 5304 (for FTA). The FPF review includes a determination whether the Statewide Transportation Improvement Program (STIP) and the Metropolitan Planning Organization (MPO) Transportation Improvement Programs (TIPs) were developed in accordance with applicable requirements. The issuance of a FPF is a prerequisite to FHWA and FTA's approval of the STIP and STIP amendments (23 U.S.C. 135(g)(7) and 49 U.S.C. 5304(g)(7)).

This FPF is divided into three tiers, each of which carry specific conditions and requirements to resolve the Federal actions identified. The tiers are as follows:

- Tier 1: Conditions for STIP approval
- Tier 2: Conditions for STIP amendment approval
- Tier 3: Conditions for project approvals

Federal Action Definitions

The FPF outlines the Federal planning regulations for which there are findings based on review of the STIP and other required planning processes and activities. Findings act as the official record for what State DOTs and MPOs are doing well, where improvements are needed and where there are compliance issues that must be resolved. For each finding, a Federal action is also documented. These actions are defined as:

- **Corrective Actions:** Items that do not meet statutory and regulatory requirements. Each corrective action requires action by the State and/or MPO.
- **Recommendations:** Items that meet the statutory and regulatory requirements but may represent opportunities to improve the transportation planning processes.
- **Commendations:** A planning activity that demonstrates innovative, highly effective, wellthought-out procedures for implementing the planning requirements or represents a national model for implementation and can be cited as an example for others.

Tier 1: Conditions for STIP Approval

The following Federal actions must be resolved prior to FHWA and FTA approval of the STIP.

1. 23 CFR 450.218(b) and (k) – MPO and Other Transportation Improvement Programs *Finding:*

The MPO TIPs are included into the STIP by reference. The STIP also includes projects located within MPO planning areas that are either not included in the most recently adopted MPO TIPs, are project groupings identified specifically for an MPO, or that duplicate projects already included in the MPO TIPs with either identical or different attributes, such as project cost estimates, description, or funding sources. Additionally, the STIP acknowledges that other TIPs, such as Western Federal Land Highway Division (WFLHD) TIP and Tribal TIP(s), are also included into the STIP by reference. There are projects listed in the STIP that also belong in the WFLHD TIP or Tribal TIP that are included by reference. A list of specific projects from the STIP that are located within MPO boundaries or are included in other TIPs is available in Appendix A.

Corrective Action:

a. Any project in an MPO area, must be included in the MPO TIP. Likewise, any project programmed through WFLHD or through the Tribes must be included in the appropriate TIP. Based on DOT&PF's processes, MPO TIPs and other TIPs must be included into the STIP by reference without modification. The DOT&PF must work with the MPOs in support of their continuing, cooperative, and comprehensive planning processes to include DOT&PF projects in the MPO TIP, at which point the MPO can submit their TIP to the DOT&PF for reference into the STIP for Federal approval. This process also applies to other TIPs that the STIP indicates are included by reference.

2. 23 CFR 450.218(j) – Project Groupings

Finding:

The STIP includes several project groupings. Some of the groupings do not meet the requirements outlined for grouped projects under 23 CFR 450.218(j), to include the project description and documentation that projects to be programmed in the group meet grouping requirements. A list of specific project groupings that do not meet the requirements is available in **Appendix B**.

Corrective Action:

b. Each grouping of projects must include a project description, the type of work, location, termini, phases, etc. In addition, each grouping must document that only projects that are fully exempt for AQ Conformity, and are a Categorical Exclusion under NEPA, or are environmentally neutral, are to be funded within each grouping.

3. 23 CFR 450.218(m) – Fiscal Constraint:

Findings:

Operations and maintenance of the transportation system is briefly discussed and is stated to be a priority for the agency. A reference to Appendix C of the STIP is said to provide additional clarification. However, Appendix C focuses on Federal Transportation Performance Management

and does not provide any additional information about the operations or maintenance of the transportation system as it relates to the STIP and fiscal constraint.

The STIP provides a financial plan that both describes the Federal funding sources available and the amount of funds available by year for each source (Tables 3-5). FTA funding sources are not defined. However, the STIP does not provide the same information for State and local funds, except for a listing of funds that may be associated with match by year (Table 9). It's unclear how Table 9 relates to the availability and types of State or local funding sources, or how these funding estimates support the programmed project costs, including Advance Construction. In addition, the sources provided in Table 9 do not match the amount of State/Local matching funds and AC programed in Appendix H.

The STIP identifies Federal funding sources and defines each source and types of projects eligible for each source. Listed in Table 5 is "OFF-DG" with an associated amount of funds; and listed in Appendix H are funds associated with "OFF-Grant". It's unclear whether "OFF-DG" and "OFF-Grant" are considered the same funds. In addition, these funds are not specific for any grant award or program, therefore, it's unclear whether these funds are reasonably expected to be available as programmed.

The STIP provides a series of tables demonstrating Federal revenues and estimated project costs without local/state matching funds associated (Projects and Program Grids). The STIP also provides project specific financial data including Federal funds anticipated by year and by Federal funding source (Appendix H). There are discrepancies between the various tables both in terms of the amount of Federal funds programmed, the year in which the Federal funds are programmed, and the Federal funds anticipated to be programmed by specific projects.

Advanced Construction (AC) is identified as an innovative funding source used in the STIP to advance projects ahead of Federal funding sources. Tables 51-55 demonstrate the use of AC anticipated from 2024-2027. There are discrepancies between the information demonstrated in these Tables and the project pages that program AC in Appendix H.

The STIP includes projects for which funding is not allocated, or for activities that are not eligible for the source of funds identified, or for other reasons, the projects are not eligible to be included in the STIP. For example, Ferry Boat Funds as Toll Credits and Advanced Construction Conversion (ACC). No additional project level information for either of these two categories of funds are made available in the document. For a full list of projects that are ineligible for inclusion in the STIP, see **Appendix D**.

Corrective Actions:

The STIP must demonstrate fiscal constraint for all funding sources including state and local funds used to support the transportation program. This includes:

c. Document how the DOT&PF determined the operations and maintenance needs and how these needs are defined and the financial support for operations and maintenance, including system level estimates of costs and the funds that are reasonably expected to be available to address these needs. If there is a deficit in meeting operations and maintenance needs, the STIP must explain how that deficit impacts the transportation system and/or how the State/locals will fund the financial deficit.

- d. Describe and document the availability of state and local funding sources and how these funds will be used to support the projects programmed in the STIP including Advance Construction.
- e. Describe and document each Federal grant program associated with programmed projects in the STIP including FTA sources and any discretionary grant sources. The STIP may only include discretionary grant funds for which projects have been awarded or that are reasonably expected to be available within the timeframe of the STIP.
- f. Ensure all tables are consistent throughout the STIP including where projects are identified, and funding sources are specified and programmed.
- g. For each project using ACC, identify the Federal funding source(s) used for the conversion of the AC project.
- h. For each project using Ferry Boat Funds as Toll Credits, identify the use of these funds in the funding information in Appendix H.
- i. All projects included in the STIP must be eligible for the funding sources to which they are programmed.

4. 23 CFR 450.218(p) – STIP Amendment and Modifications

Findings:

The STIP amendment and administrative modification procedures provide a series of thresholds and criteria defining in part the amount of funds allowed under a STIP administrative modification versus a STIP amendment. The STIP provides exceptions to these thresholds and criteria that include among other actions, funding adjustments to award contracts.

The STIP outlines specific review and approval processes to be undertaken by FHWA and FTA. Specifically, FHWA/FTA are provided one week to review and provide comments on draft STIP amendments and two weeks to review and provide approval for final STIP amendments. In addition, the STIP describes a provision that FHWA or FTA may approve a STIP amendment on behalf of the other Federal agency.

Corrective Actions:

- j. All project cost increases that exceed agreed-to criteria and thresholds outlined for STIP amendments and administrative modifications must comply with STIP amendments and administrative modification procedures. The STIP must document that the agreed-to STIP amendment and modification criteria and thresholds that apply without any exceptions.
- k. FHWA and FTA will determine the time required for joint Federal agency review and approval of STIP amendments. In addition, DOT&PF may not decide if one Federal agency can approve a STIP amendment on behalf of the other agency. All language specifying FHWA and FTA review and approval timelines and processes must be removed from the STIP.

5. 23 CFR 450.220 Self-certifications, Federal Findings and Federal Approvals

23 CFR 450.220(a)(7) – Air Quality Conformity

Findings:

Effective January 4, 2024, the EPA issued Air Plan Partial Approval and Partial Disapproval; AK, Fairbanks North Star Borough; 2006 24-Hour PM2.5 Serious Area and 189(d) Plan. This rule placed the Fairbanks North Star Borough non-attainment area under a conformity freeze. There are

projects included in the STIP that have not been processed through the Interagency Consultation process as required for non-attainment/maintenance area conformity.

Corrective Actions:

- I. The STIP must document the Air Quality Conformity Freeze status of the Fairbanks North Star Borough and the impacts to the TIP and STIP that result from this condition.
- m. During the conformity freeze, FHWA and FTA are prohibited from approving a new AQ conformity for the Fairbanks North Star non-attainment/maintenance area. The Fairbanks MPO is prohibited from amending their Metropolitan Transportation Plan or Transportation Improvement Program. All new projects proposed for Federal funding within the Fairbanks North Star non-attainment/maintenance area that were not considered during the last compliant conformity review, must now be considered through the Interagency Consultation process to ensure projects meet the requirements for exemption for AQ conformity prior to including these projects in the MPO TIP or for projects outside the MPO planning area, prior to putting the projects into the STIP. See **Appendix C** for the projects that must be removed from the STIP until they are processed through the Fairbanks North Star Interagency Consultation process.

Tier 2: Conditions for STIP Amendment Approval

The following Federal actions must be resolved prior to FHWA and FTA approval of the first STIP Amendment or within six months of FHWA and FTA approval of the STIP, whichever comes first.

I. 23 CFR 450.208 Coordination of Planning Process Activities

Findings

The STIP documents the DOT&PF's commitment to coordinating with the MPOs for STIP development. However, the DOT&PF actions in developing the 2024-2027 STIP are inconsistent with the definitions of continuing, cooperative, and comprehensive planning. Specifically, the DOT&PF excluded the Metropolitan Planning Organizations (MPOs) in the development of the draft STIP provided for public review. This has resulted in programming decisions that did not originally go through the MPO planning processes including long-range planning in the metropolitan transportation plans, air quality conformity reviews, and consideration for the MPO's transportation improvement programs.

Corrective Action:

a. The DOT&PF must develop and implement processes and procedures for a continuing, cooperative and comprehensive planning process that meets the requirements of 23 CFR 450.208. These documented procedures should also include the DOT&PF's role and responsibility for oversight of MPOs, and procedures for air quality conformity, Unified Planning Work Program development, MPO Certifications, STIP development, and other joint planning processes.

2. 23 CFR 450.210 Interested Parties, Public Involvement, and Consultation.

Findings:

The DOT&PF's public participation process is administered according to State laws under 17 AAC 05.160. The DOT&PF provides a <u>web page</u> that outlines relevant public involvement processes and

resources to support effective public engagement in the planning process including the development of the draft STIP. In accordance with the DOT&PF's public involvement requirements, a 45-day public comment period was provided on the draft STIP in September 2023. No additional public engagement was offered after the close of that initial 45-day public comment period.

The STIP document outlines activities that engaged specific Tribal leaders. The document also discussed the DOT&PF participation in the 2023 Annual Project Coordination meeting with Federal Land Management agencies (FLMAs) throughout Alaska as part of their Federal agency consultation process.

The disposition of public comments is available on the DOT&PF's web page. However, documentation of public involvement processes used to develop the STIP including the involvement of affected local and appointed officials and the availability of the disposition of public comments is not documented in the STIP.

Corrective Actions:

- b. The STIP must document the public involvement processes including the involvement and coordination with affected local and appointed officials and the disposition of public comments.
- c. The STIP must provide access to or include the disposition of public comments.
- d. The DOT&PF must develop and/or document the Tribal consultation process used to establish the formal Tribal consultation processes used to engage and consult with each Federally recognized Tribe in Alaska. Tribal consultation must be demonstrated and documented for all Federal planning and programming processes including in the STIP.

Recommendation:

a. While the DOT&PF's public participation requirements were followed in the development of the STIP, the public participation processes do not address how the public will be engaged when significant changes take place for documents such as the STIP prior to adoption or submittal for Federal approval. The public participation process should document processes to engage the public when significant changes are made to Federal documents and how the disposition of public comments are made available.

Commendation:

a. The DOT&PF was an active participant in the 2023 Annual Project Coordination meeting of FLMAs, sharing the current and draft STIP. The DOT actively shared information and coordinated with FLMA's about projects impacting federal lands and the unique needs and interest of FLMA partners. This model of coordination is one that other DOTs can use to engage and coordinate with FLMA's in a productive way, securing both open communication and shared understanding and vision.

3. 23 CFR 450.218 Development and Content of the Statewide Transportation Improvement Program (STIP)

23 CFR 450.218(b) and (k) – MPO Transportation Improvement Programs *Finding:*

The STIP references coordination with Alaska Tribes, but there is no reference to the Tribal Transportation Improvement Programs (TTIP) associated with the Tribes. In addition, there is no reference to the Federal Lands Management Agency Transportation Improvement Program (FLMA TIP).

Corrective Action:

 As part of the coordination processes, the STIP must document and reference the TTIP and FLMA TIP. This includes where these documents are located within the STIP, and the processes used to include these documents upon availability.

4. 23 CFR 450.218(I) – Year of Expenditure:

Findings:

The STIP includes an inflation factor of 1.5% for Federal revenues but, does not address how cost estimates reflect the Year of Expenditure (YOE), how the inflation factor was determined, or whether it was developed in consultation with MPOs, and public transportation operators, as required. In addition, the inflation factor used is inconsistent with the State's *Highway Preconstruction Manual* which indicates a 3% annual inflation factor is appropriate for project estimates.

Corrective Action:

f. All costs and revenue estimates identified in the STIP must reflect YOE and be based on an inflation factor consistent with state policies.

5. 23 CFR 450.218(p) – STIP Amendment and Modifications

Finding:

The DOT&PF and MPOs each administer their TIPs and STIP differently. A consequence of these differences is the amount of time it takes to process an amendment through the MPO and the State DOT&PF; it can take up to nine months to process one STIP amendment before it reaches FHWA and FTA for approval. This process impacts the flexibilities necessary to effectively manage the TIP and STIP.

Recommendation:

b. The DOT&PF should coordinate with MPOs, FHWA and FTA to review and revise the STIP and TIP modification procedures to streamline the processes and ensure a responsive, timely approach to TIP and STIP management.

6. 23 CFR 450.218(q) Transportation Performance Management (TPM) and 23 CFR 450.206(c) Performance-Based Planning and Programming

Finding:

In Appendix C of the STIP, the DOT&PF documents their TPM targets and provides a discussion about how targets are set throughout the period of the STIP. A listing of performance-based plans is also provided as evidence of a performance-based planning process and to define the DOT&PF's project selection processes. The Appendix also provides an analysis demonstrating DOT&PF's progress to date in meeting most of the TPM targets.

Corrective Actions:

- g. The STIP must, to the extent practicable, provide a discussion of the anticipated effect of the STIP toward achieving the performance targets identified by the State.
- h. The STIP must also clarify the performance-based planning processes and the project selection processes that support the investment priorities programmed in the STIP.

7. 23 CFR 450.336(b) - Transportation Management Area Certification Review

The following corrective actions must be resolved as described in the Anchorage Metropolitan Area Transportation Solutions (AMATS) 2023 Transportation Management Area Certification Review.

1. 23 CFR 450.326(c) and (d) Development and content of the transportation improvement program (TIP)

The TIP must include a description of the effect of the projects toward achieving the Federal performance targets. This includes analysis and clarification of how the TPM was administered through project selection and/or prioritization and how projects in the TIP will support the TPM targets. The TIP must include a description that demonstrates how projects contribute toward achieving the selected performance targets identified in the metropolitan transportation plan and link investment priorities to those performance targets.

2. 23 CFR 450.316(a)(1)(vi) Interested parties, participation, and consultation.

The PPP must include information about the disposition of public comments and how/where the public can gain access to the disposition of public comments as part of the final MTP and TIP documents.

3. 23 CFR 450.324 (f)(6) Development and content of the metropolitan transportation plan.

The MTP must document the consideration of the results of the CMP, including identifying any project including SOV projects, that result from the CMP.

4. 23 CFR 450.322 (d)(6) Congestion management process in transportation management areas.

The CMP must implement a process that assesses the effectiveness of implemented strategies, in terms of the area's established performance measures. This assessment should consider changes in policy, performance measures, and data collection to ensure the CMP is current and supports the planning processes of the MPO.

5. 23 CFR 450.326(j) Development and content of the transportation improvement program (TIP).

The TIP financial plan must demonstrate how the approved TIP can be implemented, including clearly identifying all federal funding sources as well as the required non-federal matching funds. These non-federal funds must be treated similarly to the Federal funds in terms of documenting whether the funds are reasonably expected to be available.

6. 23 CFR 450.326(j) Development and content of the transportation improvement program (TIP).

The TIP cannot include projects for which funds are not currently available, including those projects with zero funds. The TIP may only contain projects for which funding is reasonably expected to be available. Any projects that are not funded, are considered illustrative and must be clearly identified and are not considered part of the approved TIP. As funding becomes available, the illustrative project must be added to the TIP through approved amendment procedures.

Tier 3 – Conditions for Project Approval

The projects included in **Appendix E** identify specific eligibility, project description, and/or programming questions that must be resolved. Questions identified in **Appendix E** for each question must be resolved in the STIP prior to submitting the project to FHWA or FTA for authorization.

Appendix A – Projects in a TIP Included by Reference

The following projects must be included in the associated Metropolitan Planning Organization's TIP, or other TIP, prior to being included in the STIP by reference, and unchanged from what is approved in the applicable TIP. Projects that are included by reference through a TIP, but are listed individually in the STIP must be removed from the STIP. Projects that have not gone through the MPO planning process or other TIP processes and are not listed in the MPO TIP or other TIP must be removed from the STIP.

Table A		
Need ID	Title	MPO
33883	Area Transit Operations and Improvements	AMATS
33862	Carbon Reduction Program: AMATS	AMATS
6460	Community Transportation Program AMATS	AMATS
9299	Congestion Mitigation and Air Quality Improvements: AMATS	AMATS
34171	Glenn Highway Incident Management and Traffic Accommodations	AMATS
31274	Glenn Highway Milepost 0-33 rehabilitation Airport Heights to Parks	AMATS
31846	Glenn Highway and Hiland Road Interchange Reconstruction and Operational Improvements	AMATS
34343	Metropolitan Planning Organization (MPO) AMATS Planning	AMATS
33044	Transportation Alternatives Program: AMATS	AMATS
34345	Urban Transit AMATS Planning	AMATS
34374	Railroad Anchorage North & South Rail Corridor	AMATS
34189	Reconnecting Fairview: Neighborhood Revitalization through	AMATS
	community led highway redesign	
34164	Seward Highway Milepost 98.5-115.3	AMATS
26121	Air quality planning project	FAST
20294	Air Quality public education	FAST
3843	Airport Way and Cushman Street Intersection Reconstruction	FAST
33863	Carbon Reduction Program: FAST MPO	FAST
17662	Community Transportation Program: FAST MPO	FAST
17663	Congestion Mitigation and Air Quality Improvements: FAST MPO	FAST
34347	Fairbanks Area Transit Operations and Improvements	FAST
34346	Metropolitan Planning Organization (MPO) FAST MPO	FAST
34403	Peger Road Corridor Study	FAST
29232	State Implementation Plan Committed measures	FAST
33864	Transportation Alternatives Program: FAST MPO	FAST
34348	Urban transit FAST Planning	FAST
3821	University Avenue Widening	FAST
28089	Glenn Highway Milepost 66.5-92 Reconstruction	WFLHD
33825	Prince of Wales Neck Lake Road Reconstruction	WFL HD
34262	Elliot Hwy Manley Bridge Replacement MP 150	TTIP

Appendix B – Project Groupings

The following project groupings must include a sufficient project description, including project location, type of work, termini, etc., to be included in the STIP. If any work occurs within a MPO boundary, it must first be included in the MPO's TIP before being included in the STIP by reference.

Table B		
Need ID	Title	
34395	Carbon Reduction Program: MVP MPO	
33861	Carbon Reduction Program: Rural	
34223	Community Transportation Program: Alaska-wide	
34393	Community Transportation Program: MVP MPO	
34394	Congestion Mitigation and Air Quality Improvements: MVP MPO	
34320	Ferry Service for Rural communities Operating assistance	
33860	Resiliency Program	
34396	Transportation Alternatives Program: MVP MPO	
34194	West Coast Alaska Community Resiliency	

Appendix C – Projects Requiring Interagency Consultation

Due to the Conformity Freeze for the Fairbanks Northstar Air Quality Non-attainment area, the following projects must first be reviewed by the Fairbanks North Star Interagency Consultation process prior to inclusion in the TIP or STIP listed in the Table. These must be removed from the STIP.

Tuble C

Table C		
Need ID	Title	TIP/STIP
34399	Weigh-in-Motion Wayside Improvements	STIP
34130	Richardson Highway Milepost 346 Chena Bridges Replacement	TIP
34196	International Airport Charging Stations	TIP

Appendix D – Ineligible Projects The following projects appear to be ineligible for inclusion into the STIP for the reasons shown for each specific project. These projects must be removed from the STIP.

Table D

Table B		
Need ID	Title	Comment
33824	Alaska Highway Milepost 1380 Johnson River Bridge Replacement	NHFP funding identified but is not included in the Freight Investment Plan. Ineligible for NHFP funding.

Need ID	Title	Comment
11439	Anton Anderson Memorial (Whittier) Tunnel Maintenance and Operations	"Operations" should be removed as it and routine maintenance were deemed ineligible for federal-aid funding.
		NHFP funding identified but is not included in the Freight Investment Plan. Ineligible for NHFP funding.
33974	Cascade Point Ferry Terminal	No ferry facility here/not part of any transportation network. Project is ineligible for federal-aid funding.
10765	Egan Yandukin Intersection Improvements	Project is not in HSIP implementation plan. Ineligible for safety funding.
34205	Ferry Boat Funds as Toll Credits	Toll credits do not come from a federal funding source. Any use of toll credits should be noted on the individual projects they are programmed to be used on.
		Toll credits have been requested and are being reviewed for approval by FHWA.
34299	Guardrail Improvements	Project is not in HSIP Implementation Plan and ineligible for safety funding.
		Ineligible for PROTECT funding.
26120	King Cove to Cold Bay Road	No CDS/earmark funds have been allocated to this project. No funding is identified.
31310	Klondike Highway Rehabilitation: Skagway River Bridge to Canadian Border	Project not in Freight Investment Plan. Not eligible for NHFP funding.
32218	Prince William Sound Area Transportation Plan Update	Effort is funded in AWP.
33248	Shishmaref Sanitation Road Erosion Control	No CDS/earmark funds have been allocated to this project. Unclear where ER funding is coming from (no ER funds for this).
33801	Southeast Alaska Transportation Plan	Effort is funded in AWP.
33721	Statewide Transportation Improvement Program Management Software and Support	Effort is funded in AWP.
33098	Statewide Functional Class Update	Effort is funded in AWP.
34206	West Susitna Access Road	No bridge work identified in scope. Not eligible for BFP.

Need ID	Title	Comment
25836	AASHTO Technical Programs Support	Unclear this project is eligible for funding. Past funding has all been research.
ACC	Advance Construction Conversion	Conversion of AC'd funds needs to be identified on each project with the source of the converted funds identified and programmed.
6447	Bridge and Tunnel Inventory, Inspection, Monitoring, Preservation, Rehab, and Replacement Program	Monitoring/Inspection work is ineligible for Bridge Formula Program (BFP) funding.
6454	Bridge Management System	Work is ineligible for BFP.
12579	Bridge Scour Monitoring and Retrofit Program	Monitoring is not eligible for BFP.
13239	Culvert Repair and Replacement	Unclear how bridge funding can be used if culverts are not identified and may not meet bridge requirements.
34320	Ferry Service for Rural Communities Operating Assistance	No description supports this Need ID.
34258	Frontier Roads, Trails, and Bridges Program	Unclear if it is eligible for identified funding sources.
343130	State-owned Shipyard Repairs	Shipyards are not part of a transportation facility. Unclear how it is eligible for federal-aid funding.

Tier 3: Appendix E – Conditions for Project Approval

Table E-1: FHWA and FTA are unclear of the eligibility for projects included in Table E-1. Project descriptions must sufficiently describe the project or phase, estimated total costs must be consistently and accurately defined, federal funds programmed by year must be supported by a specific funding source(s), and agencies responsible for implementation of projects must be clearly identified per 450.218(i). The questions posted for each comment must be addressed prior to authorization. This may require a STIP amendment for some projects.

Need ID	Title	Comment/Question
34317	Alaska Highway Yukon Territory Permafrost Repairs	Funding is allowed at 100% federal share. FHWA administers Shakwak projects.
		Unclear if this is how these projects should be programmed. It should be included in a previous table to demonstrate fiscal constraint but I do not believe a Need ID is appropriate.
22299	Alaska Highway Milepost 1235-1268 Rehabilitation	Total project cost includes first construction project (0A11016) but does not include the \$4,210,115 that is currently obligated (0A11014)
34126	Alaska Highway Milepost 1348 Robertson River Bridge Replacement	Table 51 (AC) includes \$2,089,514 AC'd in 2027 and to be converted in 2028 which is missing in "After 2027" costs. Also needs to identify the AC funding.
		Current estimate identifies a utilities funding need. How is construction split between 2 FYs?
33824	Alaska Highway Milepost 1380 Johnson River Bridge Replacement	Table 51 (AC) includes \$27,908,922 AC'd in 2026 and to be converted in 2029 and 2030 which is missing in "After 2027" costs.
		Current project has (0A22008) has \$2.2M which is not fully included in the total project cost.
		How is construction split between 2 FYs?
22322	Alaska Highway Milepost 1393 Gerstle River Bridge Replacement	Table 51 (AC) includes \$54,386,517 AC'd in 2027 and to be converted in 2029, 2030, and 2031.
		The ~\$54M is not shown as needed in 2027 and is unclear the AC conversion is included in out years.
27509	Alaska Marine Highway System Ferry Overhauls	Description identifies this as state-funds only and there are no federal fund programs identified. Project also states it's 100% federal funds.

Table E-1

Need ID	Title	Comment/Question
6446	Annual Work Planning Program	Not required to be in the STIP.
28332	Anton Anderson Memorial (Whittier) Tunnel Backup Generation	Estimate shows additional design funding needed for this project.
		Project (0496013) has \$5,986,372 which is not included in total project cost.
11439	Anton Anderson Memorial (Whittier) Tunnel Maintenance and Operations	There is already a project (0496019) open for FY21-25 activities with \$15,759,930.59 obligated and only \$4,403,857.70 expending. Why are FY24 and FY25 funding needs identified?
33693	Big Lake Road Rehabilitation	MP 0-3 (0511009) estimates \$12M in construction and \$900k in design needed. MP 3.6-9.1 (0511010) estimates \$10M in construction and \$800k in design needed. Total Need ID appears to be underprogrammed. Why are all phases split in FYs?
6447	Bridge and Tunnel Inventory, Inspection, Monitoring, Preservation, Rehab, and Replacement Program	Need ID title is misleading. This project is understood to only be for inventory, inspection, and monitoring. Why is it a "multiphase" project? Current STIP has \$7.8M annually programmed to this work. NBI requirements have changed. \$3M is very low and the need is much greater (confirmed by DOT&PF Bridge). Need ID appears to be underprogrammed.
6454	Bridge Management System	Why is it multiphase? Why does it switch to Phase 1 in 2026?
12579	Bridge Scour Monitoring and Retrofit Program	Unclear where construction work will be occurring (location, termini, scope).
33241	Cape Blossom Road	Project (0002204) currently has \$6,849,827.29 that is not included in total project cost. Stage I project (0002469) has \$43,750,099 - is this project included in this Need ID? If so, also needs to be included in total project cost.
34319	Cold Bay AMHS Ferry Terminal Improvements	Schedule is unachievable. How is ~\$5 in design (PE through Final Design) going to be completed in a year?

Need ID	Title	Comment/Question
13239	Culvert Repair and Replacement	Understood this Need ID to mean to support identification or problem culverts. Is construction occurring? There are no project limits or scope of work identified.
22452	Dalton Highway Milepost 109-144 Reconstruction and Douglas Creek Bridge Replacement	 Project (0653007) has \$6,436,000 which needs to be included in total project costs. Current STIP shows a need for utilities - if that's still needed, where is funding programmed? Current project schedule shows MP120-135 obligated for construction at the beginning of FY25 and MP 109-120 obligated for construction beginning of FY27.
33240	Dalton Highway Milepost 190 Hammond River Bridge Replacement	Project (0654012) has \$600,000 which needs to be included in total project costs. Current estimate shows a need of \$12.5M for construction - appears to be underprogrammed.
22475	Dalton Highway Milepost 305-335 Reconstruction and Dan Creek Bridge Replacement	Project (0656006) has \$4,352,000 which needs to be included in total project costs. Construction year identified is 2027. What are the "After 2027" funds for?
31899	Disadvantaged Business and Civil Rights Disparity Compliance Study	What phase of work is programmed? Completely missing.
10765	Egan Yandukin Intersection Improvements	Project has not started design. Very unlikely it will be ready for construction by FY25.
33600	Elliott Highway Milepost 12-18 Rehabilitation	Project (0680036) has \$500k which needs to be included in total project costs. How are design and utilities going to be obligated in the same FY?
33601	Elliott Highway Milepost 63-73 Rehabilitation	When is construction going to occur?
33921	Fairview Loop Road Rehabilitation and Pathway	State-funded project (Z560200000) for the pathway is included with this project and should be included in total project costs. State funds = \$8,259,000

Need ID	Title	Comment/Question
18358	Ferry Refurbishment	Ferry vessel refurbishments are programmed individually in this STIP (see Need IDs 34212, 34211, 34209, 33978). What is the scope of this Need ID?
18359	Ferry Terminal Refurbishment	Ferry terminal refurbishments are programmed individually in this STIP (see Need IDs 33967, 33974, 34192, 33885, 34193, and 33883). What is the scope of this Need ID? Primary funding source says STBG but table identifies FBF.
		How has construction occurred in the past?
28349	Front Street Resurfacing: Greg Kruschek Avenue to Bering Street [CTP Award 2019]	No expenditures have been made to this project. Why is more design funding in FY24 needed?
34258	Frontier Roads, Trails, and Bridges Program	No scope of work or location included in description.
2320	Glenn Highway Milepost 53-56 Reconstruction and Moose Creek Bridge Replacement	Project (0A15025) is pending closure by DOT&PF due to no need. Why are funding needs in FY24 and out years if project will be closed?
		DOT&PF has indicated they are working on a new scope of work for this area. A new Need ID should be programmed and 2320 should be removed.
28089	Glenn Highway Milepost 66.5-92 Reconstruction	Is this a combination of Need IDs 28089, 29931, 30396, and 31493?
		Current construction estimate is \$300M which is not identified in total project costs.
		What is the \$5k of ROW needs in FY24? Required to obligate the entire phase (the estimate) and it is unclear that is occurring.
31841	Glenn Highway Milepost 49 Safety and Capacity Improvements	Project (0A15040) has \$2M which is not included in total project costs.
		What is funding need in out years? When is construction going to occur?

Need ID	Title	Comment/Question
32018	Glenn Highway Milepost 158-172 Rehabilitation	Project (0A14009) has \$900k which is not included in total project costs.
34299	Guardrail Improvements	Scope of work and project limits are missing.
2152	Haines Highway Milepost 3-25 and Chilkat Bridge Reconstruction	Unclear if project is ready to advance to construction.
34312	High Priority Fish Passage Restoration at Threemile Creek in Klawock, Alaska	Culvert AOP grants are not required to be in STIP.
12979	Highway Fuel Tax Evasion	Unclear this project is eligible for NHPP funding. STBG should be funding source.
		Funds are 100% federal (no match required).
34146	Juneau Douglas North Crossing	Planning is not a phase of a construction project. Separate planning work in a different Need ID.
		Planning study not expected to be complete until summer 2024. How is design going to start immediately after?
		Match is not correct - 5% for RAISE and 9.03% for CDS.
34318	Kalifornsky Beach Road Drainage Improvements	Why does it state primary funding source is "illustrative"?
		Project is not active yet. 1 year to get through environmental and design is likely unachievable.
33218	Keku Road Resurface: Kake to Seal Point	How is construction work split into 2 years?
34354	Ketchikan Airport Ferry Terminal	No description supports this Need ID.
34212	M/V Columbia Controllable Pitch Propeller	Project (9500143) has \$14,232,725.01 and is already in construction. Unclear what this Need ID is for.
34211	M/V Kennicott Emissions and Exhaust	Project (9500158) has \$22,615,385.62 and is already in construction. Unclear what this Need ID is for.
33976	M/V Mainliner Replacement Vessel	\$11M for design seems very high. Is this based on an estimate?
34209	M/V Matanuska Safety Improvement Project	\$37M for design seems excessively high. Is this based on an estimate?
30189	M/V Tustumena Replacement Vessel	Project (9500153) has \$14,327,805.55 which is not included in total project costs.

Need ID	Title	Comment/Question
34131	Naknek River Watershed Culvert Replacements, King Salmon, Alaska	Culvert AOP grants are not required to be in STIP. Why are planning funds identified? Where is design funding?
34201	Nome Emergency Repairs from the West Coast Alaska Storm	ER projects are not required to be in STIP. Design/ROW/UT are still required for ER projects. Match is required for ER projects.
2436	Otmeloi Way Reconstruction [CTP Award 2019]	Unclear how design and ROW will occur this FY
34315	Parks Highway Fish Passage Improvement Plan	Culvert AOP grants are not required to be in STIP.
34172	Parks Highway Milepost 52-57 Big Lake to Houston Reconstruction	Schedule appear to be unachievable for such a large construction project. Match makes no sense.
29914	Parks Highway Milepost 99-163 Improvements and Railroad Creek Bridge Replacement	Project (0A41042) has \$4.5M which is not included in total project cost. How is construction split into 3 different years?
34304	Parks Highway Milepost 303-306 Reconstruction	How is 3 miles of Parks Highway reconstruction going to cost less than \$4M? Is this based on an estimate? Appears underprogrammed.
22335	Parks Highway Milepost 315-325 Reconstruction	Project (0A45028) has \$7,457,947 which is not included in total project costs.
33696	Petersville Road Milepost 7 Moose Creek Bridge Reconstruction	Entire project is proposed to be funded with BFP. Unclear if it is all eligible for BFP.
34311	Port Valdez-Frontal Valdez Arm Watershed	Culvert AOP grants are not required to be in STIP.
32723	Redoubt Avenue and Smith Way Rehabilitation [CTP Award 2019]	Project (0001728) currently has \$789k which is not included in total project costs.
2119	Richardson Highway Milepost 148-173 Reconstruction	Project (0713010) has \$8,220,031.31 which is not included in total project estimate.
		Completed construction for a portion of this Need ID (0713013) has \$40,065,165 which is not included in total project estimate.

Need ID	Title	Comment/Question	
32580	Richardson Highway Milepost 233 Bear Creek Bridge Permanent Repair	 Project (0714024) has \$34,650,379 which is not included in total project costs. Project is already in construction. Why is there more funding? ER funds are not required to be in STIP. 	
34155	Sargent Creek and Russian River Bridges Planning Study	Project is funded with a Bridge Investment Program discretionary grant (required to be in STIP). Funding source identifies BFP. Need to fix.	
33445	Sargent Creek Bridge Repairs	There is a project for this bridge replacement (0391016). Unclear the relationship. Replacement is not identified in this STIP.	
28890	Sayles/Gorge Street Viaduct Improvements	How is ROW funding need in FY24 along with construction?	
34305	Seldovia Gravel Source Road	Required match for CDS is missing.	
26085	Seppala Drive Rehabilitation and Realignment	Current schedule shows construction in FY25.	
33741	Seward Highway and Sterling Highway Intersection Improvements	Current estimate identifies \$60.2M in construction funding needs. Appears to be underprogrammed.	
		How is construction occurring in 2025 and 2027?	
33247	Seward Highway Milepost 14 Railroad Crossing Reconstruction	What is "RAIL" funding? Not identified anywhere in STIP.	
		Project (0311037) has \$3M which is not included in total project cost.	
		Project has to be constructed by end of 2025 to accommodate ARRC project.	
		Current estimate shows \$20M for construction and \$150k for utilities needed. Appears to be underprogrammed.	
		How is construction occurring in 2024 and 2025?	

Need ID	Title	Comment/Question	
30209	Sitka Sea Walk Phase 2 [TAP Award 2016]	What grant? FLAP funds exceeds what's in TIP (only \$2,192,517 programmed).	
		Environmental document is not complete. How is construction going to occur in 2024?	
31719	South Tongass Highway and Water Street Viaduct Improvements	Estimate identifies \$54M in construction funding needed. Appears to be underprogrammed.	
		How is construction occurring across 2 years?	
23455	South Tongass Highway Saxman to Surf Street Reconstruction	Project (0902031) has \$8,107,331 which is not included in total project costs.	
34310	Statewide Equitable Community Connectivity Action Plan (SECCAP)	Include RAISE grant in description.	
33098	Statewide Functional Class Update	This is a one time effort. Why is funding needed throughout STIP years?	
29913	Sterling Highway Milepost 82.5-94 Safety Corridor Improvements	Current estimate shows \$105M for construction funding needed. Appears to be underprogrammed.	
2670	Sterling Highway Milepost 157-169 Reconstruction Anchor Point To Baycrest Hill	Unclear if all \$20.4 is eligible for safety funding. Current estimate shows a \$136.4M construction funding need. Appears to be underprogrammed. When is construction occurring?	
33881	Sterling Highway Schooner and Cooper Landing Bridge Preservation	ER funding is not required to be in STIP. Unclear how it is eligible for ER funding.	
32299	Takotna River Bridge Replacement Bundle	Project (0001569) has \$1,650,000 and project (000S783) has \$1,668,100. Where is other project funding coming from?	
33178	Trout Creek Culvert Replacement and Aquatic Organism Passage Improvements	TIP only has \$1,957,500 in FLAP funding available.	
32726	Trunk Road (Nelson Road) Rehabilitation and Bridge Replacement [CTP Award 2019]	Why is planning a part of a construction project?	

Need ID	Title	Comment/Question	
2503	Wasilla to Fishhook Main Street Rehabilitation	Project (0001408) has \$14,200,000 and is not included in total project costs.	
		Current estimate shows \$40M in construction funding and \$8M in utilities funding needed. Appears to be underprogrammed.	
34194	West Coast Alaska Community	Unclear if project is eligible for funding.	
	Resiliency	What are project limits and scope of work? Where is work occurring?	
		Schedule appears to be unattainable.	
		How is construction occurring across two years?	
34405	Complete Streets Statewide Planning	Why is planning and construction work combined? Where is construction work going to occur (activities, locations, termini)?	
		Unclear if project is eligible for funding.	
18791	Congestion Mitigation and Air Quality Improvements: Statewide	Scope does not include a description of work to be performed, where work will be occurring, or the termini.	
		Why does the phase change from P1 to P0 in 2025?	
29675	Cultural Resource Management	Why is this a multiphase project?	
		Unclear if eligible for NHPP.	
34198	Light up the Highways	Locations of work and scope are missing.	
33965	Rock Slope Stabilization Program	Unclear if this is in the HSIP list of projects. Unclear if eligible for safety funding	
6457	Seismic Bridge Retrofit Program	Why is this a multiphase project? Appears to just be for evaluation.	
34199	Sustainable Transportation and Energy Program	Why is this a multiphase project? Appears to just be for evaluation/planning.	
34200	Transportation Workforce Development and Training	Unclear how no match is required for specified funds. Unclear how it is eligible for funding programs.	

Need ID	Title	Comment/Question		
34190	Waterways Program	Why is this a multiphase project? What are project limits and scope? Where is work occurring?		
		Unclear if work is eligible for PROTECT funding.		
34206	West Susitna Access Road	When is AC'd funding going to be converted?		
		How is project going to advance to construction in 18 months? No work has begun.		

Table E-2: The following active projects in FHWA's Financial Management Information System (FMIS) with end dates within the STIP timeframe. These are projects that were identified for construction by the end date identified. A clarification of the project status is required for each project listed in Table E-2.

FPN	State #	Title	PE Date	ROW Date	Project End Date
0001605	CFHWY00323	VINE RD IMPROVEMENTS: KNIK-GOOSE BAY RD TO HOLLYWOOD RD	12/19/2017		07/01/2026
0002384	NFHWY00162	KIVALINA EVACUATION AND SCHOOL SITE ACCESS ROAD	10/24/2016		12/31/2024
0002514	NFHWY00687	SHISHMAREF SANITATION ROAD EROSION CONTROL	05/04/2022		06/30/2025
0212015	Z530140000	STERLING HIGHWAY MILEPOST 44.5 TO 58 (MILEPOINT 7.6 TO 22), SUNRISE INN TO SKILAK LAKE ROAD, RECONSTRUCTION	11/04/1975	02/18/2021	06/30/2027
0391015	SFHWY00111	KDK CHINIAK HIGHWAY REHABILITATION: MILE POST 15 TO 31	03/09/2017		06/30/2024
0391016	SFHWY00459	KDK SARGENT CREEK BRIDGE (#0989) REPLACEMENT	12/01/2022		02/20/2026
0652016	Z609110000	DALTON HWY MP 0-9 RECONSTRUCTION	08/12/2011	09/22/2016	12/31/2026
0711076	NFHWY00149	RICHARDSON HIGHWAY MP 65-80 REHABILITATION	01/31/2017		03/01/2026
0713016	Z606380000	RICHARDSON HWY MP 115-148 REHABILITATION	03/24/2015	12/02/2019	12/31/2025
0714028	NFHWY00655	RICHARDSON HWY MP 214-218 RECONSTRUCTION	12/01/2022		07/01/2025
0902046	HFHWY00293	SOUTH TONGASS FERRY TERMINAL PROJECT	09/21/2022		06/30/2024
0933049	SFHWY00487	JNU GLACIER HWY RECNSTRCTION:BESSIE CRK TO ECHO COVE	01/10/2023		03/31/2024
0955017	Z684640000	HAINES FERRY TERMINAL END BERTH FACILITY	04/07/2014		03/31/2022
0971008	Z696240000	SKAGWAY FERRY TERMINAL MODIFICATIONS	09/19/2011		06/15/2027
0A13022	NFHWY00763	TOK CUTOFF HIGHWAY MP 8-22 REHABILITATION	12/12/2022		04/30/2025
0A15024	Z581040000	GLENN HWY: MP 34-42 PARKS TO OLD GLENN HWY	03/31/2005	08/18/2015	08/01/2025
0A33029	CFHWY00694	STERLING HWY MP 45-60 SUNRISE-SKILAK LAKE RD RECONS STAGE 1B		08/18/2020	12/31/2025
0A41035	CFHWY00076	PARKS HWY: HOUSTON TO WILLOW	04/12/2017		04/10/2025
0A42012	NFHWY00575	PARKS HIGHWAY MP 206-209 RECONSTRUCTION	08/02/2021		09/01/2024
0A43021	Z633890000	PARKS HWY MP 183-192 RECONSTRUCTION	09/19/2013		12/31/2026

Table E-2