

April 3rd, 2025



House Transportation Committee

Metropolitan Planning Area Boundaries

Alaska Department of Transportation & Public Facilities
Deputy Commissioner Katherine Keith, PMP, PMI-ACP



REGULATORY BASIS FOR MPO BOUNDARY UPDATES

- 23 CFR 450.312 requires MPOs to update MPA boundaries post-Census to include:
 - Entire UZA as defined by the U.S. Census Bureau
 - Contiguous areas expected to urbanize within 20 years
- Governor's approval is required to formalize MPA boundaries per 23 CFR 450.312(j)
- **Deadline:** MPOs must complete boundary updates by December 31, 2026 (based on 2020 Census UZA release in Dec 2022)
- Updated boundaries must be incorporated into the MTP (450.324), TIP (450.326), and UPWP (450.308).
- Boundary changes must be GIS-compatible and supported by data-driven growth forecasts
- If an MPO boundary is not approved by December 31, 2026, several regulatory and operational consequences will apply. These stem from noncompliance with 23 CFR 450.312 and associated federal transportation planning rules.



CONSEQUENCES OF MISSING THE 2026 BOUNDARY APPROVAL DEADLINE

- Loss of Federal Planning Certification (in TMAs):
 - For Transportation Management Areas (TMAs, i.e., MPOs >200k pop.), failure to maintain an approved MPA boundary may result in FHWA/FTA withholding metropolitan planning certification per 23 CFR 450.336.
 - Without certification, an MPO cannot program federal transportation funds.
- Projects Cannot Be Included in TIP/STIP:
 - Projects located in areas not within an approved MPA boundary cannot be included in the MPO's TIP or referenced in the STIP (23 CFR 450.326, 450.218).
 - This will delay or block federal funding obligations for those projects.
- Air Quality Conformity Determinations May Be Invalid:
 - In nonattainment or maintenance areas, conformity determinations may be found inapplicable or noncompliant, affecting MTP/TIP approval.
- FHWA/FTA Funding Restrictions:
 - FHWA and FTA may withhold funds or impose sanctions until the MPO boundary is brought into compliance and approved by the Governor.



AMATS BOUNDARY PROPOSAL

Several proposed expansions based on perceived misalignments or planning interests.

- **Expansion over Chugach State Park:** Multiple boundary extensions into undeveloped parkland raise objections, particularly without clear engagement from DNR or ARRC.
- **Encroachment on the Seward and Glenn Highways:** DOT&PF has concerns about unnecessary boundary encroachment on National Highway System facilities.
- **Coordination Deficiencies:** There is insufficient documentation confirming AMATS's coordination with state or federal landholders regarding these expansions.

DOT&PF continues to review justification materials provided by AMATS and emphasizes that expansion must serve a clear transportation purpose consistent with 23 CFR 450.312(i)—not merely administrative convenience.



SAFER SEWARD HIGHWAY PROJECT (WAS MP 98.5-118 NOW 112.5-118)



**AMATS Policy Board Removed Safer Seward Highway
From Planning Documents**

FAST BOUNDARY PROPOSAL

FAST Planning followed a robust process using 2020 Census data, stakeholder surveys, GIS modeling, and housing projections to develop its proposed MPA. However, DOT&PF identified concerns:

- **Legal Sufficiency of Boundary:** The legal description was not available. The accuracy of the boundary information was questioned. A boundary must be legally defensible and GIS-compatible.
- **Donut Hole on Farmers Loop:** A strategic omission from the MPA creates planning segmentation. Public comments questioned the logic of excluding an area experiencing high multi-modal demand.
- **Richardson Highway:** Includes several miles of the Richardson Highway near Eielson AFB. The 2020 Census-designated Urbanized Area does not include the MP 346 Chena River Floodplain segment, which includes a State-priority bridge replacement project.
- **Uniform Growth Assumptions:** Growth models assumed constant conditions across zones without accommodating varied development scenarios.



FAST Boundary – Richardson Highway Milepost 346 Chena Bridge

Draft Minimum Metropolitan Planning Area Boundary Update

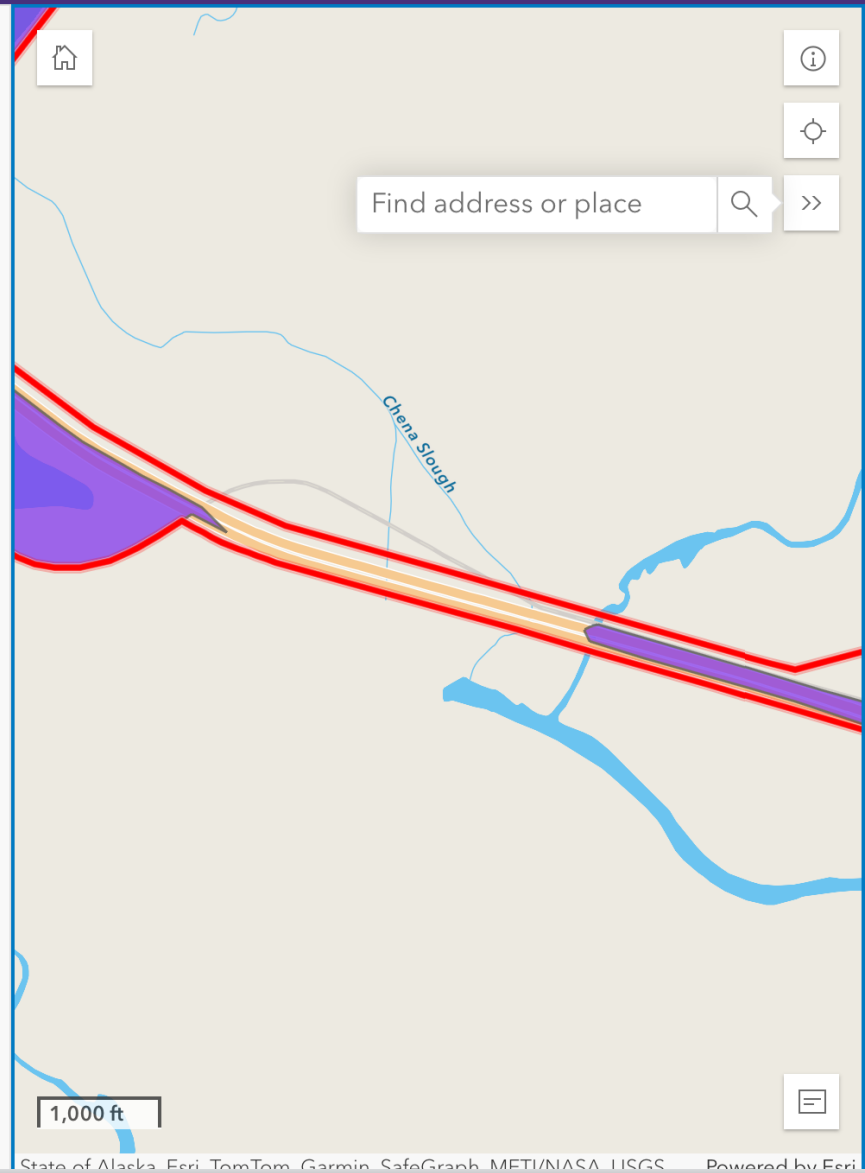
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This Draft Minimum Metropolitan Planning Area Boundary (MPA) Update was approved on 10/10/2023 by FAST Planning's Policy Board to be released for public comment from 10/12/2023-11/12/2023 . The **red line** on the map indicates the proposed the Draft Minimum MPA Update. The **purple shape** on the map shows the 2020 Census Urban Area, which is required by Federal Highways to be included in our MPA. The **blue shape** on the map identifies the current FAST Planning MPA. You can see that in some areas, there have been additions to, as well as removals from, the existing MPA. The **yellow shapes** highlight where we expect residential growth to occur by 2040, based on model projections.

Please use the **Edit** tool to draw/put points on the map and leave your comment(s) in areas that require further consideration.

You can turn layers **on and off** in the **Layers** tab.

The **Info** tab contains pop up information about the predicted developability in the FNSB.



CHRONOLOGY OF KEY CORRESPONDENCE

- **June 19, 2024** – Proposed FAST Planning revised Intergovernmental Operating Agreement was included in Policy Board Materials for Board review. No action taken.
- **October 2, 2024** – Commissioner Anderson submitted a formal request to the FAST Planning Policy Board Chair to consider proposed Operating Agreement revisions.
- **October 14, 2025** – Fast Planning Policy Board Chair responded that the Operating Agreement review will require independent reviews by local governments and will take time.
- **October 29, 2024** – Commissioner Anderson submitted a request to the AMATS Policy Board Chair for a revised boundary description.
- **December 10, 2024** – Fairbanks Technical Committee voted to recommend indefinite postponement of discussions related to the operating agreement.
- **January 22, 2025** – AMATS Executive Director sends letter to Governor Dunleavy and Commissioner Anderson asking for clarification on Operating Agreement and Boundary.
- **February 11, 2025** – Deputy Commissioner Keith submitted a formal letter to the FAST Planning Policy Board addressing questions regarding the operating agreement and boundary change request.
- **February 20, 2025** – Fairbanks Policy Board voted to indefinitely postpone further discussions on the operating agreement revision.
- **February 25, 2025** – Commissioner Anderson submitted a formal letter to the Anchorage Policy Board addressing unresolved boundary and operating agreement issues.



REDESIGNATION REQUIREMENTS

Redesignation: Required whenever there are proposed needed due to "substantial change in" decision making authority and responsibility of MPO and decision-making processes and procedures. This is typically done through intergovernmental agreements.

Federal Requirement: MPOs must have current and legally valid intergovernmental agreements per 23 CFR § 450.314(a).

Last Date of Signature

AMATS: 2002 (Revisions: 2010, 2012, 2015, 2021, 2023 without redesignation)

- **FAST:** January 2019 (Updated Boundary in April 2023 approved by Governor)
- **MVP:** December 2023



OPERATING AGREEMENT CHALLENGES

Changes in responsibilities, processes, and procedures occurred due to Federal Planning Findings require redesignation. In addition, expanding boundaries can be interpreted as an expansion of an MPO's decision making authority.

AMATS Operating Agreement Challenges

- Not in conformance with State Statutes and Regulations.
- No record of 2014 boundary changes approved by the Governor.
- AMATS assertion of control over National Highway System routes is a substantial change in responsibility not included in operating agreement.

FAST Planning Operating Agreement Challenges

- Lack of clarity of the designation process.
- Lack of clarity of the MPO's role in selecting projects on the National Highway System.
- Incorrect certification process outlined.
- Lack of accurate boundary descriptions.



TIMELINE BOUNDARY CHANGE APPROVAL

Action Item	AMATS Status	FAST Status	Target Deadline (Calendar Year)
Revise proposed MPA boundary	In Progress	In Progress	Q2 2025
Prepare revised GIS-compatible boundary shapefile and legal description	Not yet submitted	Not yet submitted	Q3 2025
Prepare supporting documentation (maps, UZA overlays, growth projections)	Not yet submitted	Not yet submitted	Q3 2025
Secure Policy Board resolution endorsing proposed boundary	Not yet submitted	Not yet submitted	Q1 2026
Submit to Governor's Office for final approval (23 CFR 450.312(j))	Not yet submitted	Not yet submitted	Q3 2026
Submit to FHWA/FTA with Governor concurrence	Not yet submitted	Not yet submitted	December 2026



INTERGOVERNMENTAL OPERATING AGREEMENT APPROVALS

Action Item	AMATS Status	FAST Status	Target Deadline
Redline draft incorporating 23 CFR 450.314 and recent guidance	In process	In process	Q3 2025
Secure MPO Policy Board reauthorization resolution	Not yet submitted	Indefinitely Postponed	Q1 2026
Submit to Governor for signature as part of formal agreement update	Not yet submitted	Not yet submitted	Q2 2026
Submit final agreement and documentation to FHWA/FTA	Not yet submitted	Not yet submitted	December 2026



THANK YOU

Deputy Commissioner Katherine Keith, PMP, PMI-ACP
Alaska Department of Transportation & Public Facilities
DOT.Commissioner@alaska.gov



4/2/2025