

Non-Metropolitan Local Official Cooperation Process | 2026 Review & Update per 23 CFR 450.210(b)

Comment/Response Log

Comment	Organization/Source	Change	Section	Response to Commentor
Comment 1: Still Heavily Notification-Based (Not Co-Development): Both versions emphasize notification, comment periods, and meetings upon request, rather than early-stage co-development of priorities and shared decision-making frameworks. Local governments are still reacting to state-developed plans rather than shaping them upstream. AML Recommendation #1: Shift from “Consultation” to “Co-Development” AML recommends adding language that: Requires engagement prior to draft development. Includes local governments in priority-setting phases. Encourages joint identification of projects and needs.	Alaska Municipal League (AML)	No Change	Sections 1-3	Sections 1–3 were intended to convey our goal of establishing an ongoing cooperative relationship, including early and consistent engagement during the development of planning products, as well as participation during the review period for the final draft. Collectively, these sections are meant to provide structured opportunities for co-development, consultation, and coordination.
Comment 2: No Formal Role for Regional Planning Organizations (RPOs): While RPOs are mentioned as possible representatives, the process does not define their role, integrate them structurally into planning, use them as organizing entities for regional prioritization. This is a missed opportunity to align with emerging RPO/COG framework in Alaska. AML Recommendation #2: Formalize the Role of Regional Planning Organizations (RPOs) AML recommends: Recognizing RPOs as primary regional coordination entities Using RPOs to: Aggregate local priorities. Facilitate regional consensus. Serve as structured partners in STIP/LRTP development.	Alaska Municipal League (AML)	Incorporated	Section 1	Thank you for this feedback, the RPO program is new as of the last NMLOCP and we have now incorporated an additional bullet under section 1 to address early engagement with RPOs.
Comment 3: Limited Commitment to Early Engagement: The process focuses on draft review stages and public comment periods. By this stage, priorities are often already set.	Alaska Municipal League (AML)	No Change	Section 2	DOT&PF is making a concerted effort to reach out early and often for planning level engagement.
Comment 3: Limited Commitment to Early Engagement: AML Recommendation #3: Increase Minimum Engagement Standards. Replace: “At least one coordination opportunity per cycle” with: Multiple engagement points: Early scoping; Draft development; Pre-final review	Alaska Municipal League (AML)	No Change	Section 2	We acknowledge the response and recommendation; however, the level of engagement noted here is consistent with federal and state regulations. Each individual planning effort strives for cooperation and engagement during early plan development and pre-final review. Coordination in draft scoping efforts continues as we are able, recognizing current efforts in March 2026 with a pre-review of the STIP, and April 2026 with draft scoping for the PPPP grant award. We hope the AML and RPO pre-review of the draft NMLOCP 2026 update also serves as an example of our ongoing efforts.
Comment 4: No Feedback Loop Requirements: Although responses to comments are posted there is no requirement to explain how input influenced decisions and no requirement for iterative engagement. Local input risks being perceived as procedural rather than impactful. AML Recommendation #4: Require a Clear Feedback Loop Add requirement that DOT&PF: Documents how local input influenced decisions Provides justification when input is not incorporated	Alaska Municipal League (AML)	No Change	Section 3	Planning views iterative engagement as impactful, and ongoing coordination has value in all planning efforts. This is difficult to quantify but serves as a core objective for making good public decisions. We are federally required to provide summaries of responses for STIP & LRTP efforts, those documents are publicly accessible, and we always strive for ease of understanding. Field offices are constructed to provide a point of contact to build rapport and relationships with NMLO’s for ongoing engagement.
Comment 5: Capacity Gaps for Small and Rural Communities: The 2026 draft acknowledges non-traditional entities but does not provide technical assistance expectations, nor address capacity limitations for participation. Communities most in need of representation may still be least able to engage.	Alaska Municipal League (AML)	No Change	N/A	We acknowledge low capacity communities may not be able to engage, we will continue to reach out and offer various levels of engagement opportunities.

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Comment 5: Capacity Gaps for Small and Rural Communities: AML Recommendation #5: Strengthen Support for Rural Participation; AML recommends: Explicit commitment to: Technical assistance; Travel or virtual participation support; Simplified materials for small communities	Alaska Municipal League (AML)	No Change	N/A	We acknowledge the need for supporting rural participation and will continue to provide a diverse set of materials and opportunities under each planning effort.
AML Recommendation #6: Improve Transparency and Accessibility: Ensure administrative records and summaries are: Publicly accessible; Easy to understand. Provide regional summaries of input and outcomes.	Alaska Municipal League (AML)	No Change	Section 3	We are federally required to provide summaries of responses for STIP & LRTP efforts, those documents are publicly accessible, and we always strive for ease of understanding. Area Planners serve as the first point of contact for NMLO's and document regional inputs and report back outcomes, especially concerning STIP projects. We recognize there is always room for improvement in communications.
AML Recommendation #7: The draft includes AML, which AML strongly supports. We recommend: Formalizing AML as a standing coordination partner; Using AML to: Disseminate information; Aggregate statewide local priorities; Support training and engagement .	Alaska Municipal League (AML)	No Change	Section 1	We proudly recognize AML as a formal coordination partner through the various plans and projects jointly under development, MOA signed 12/2/24. Under bullet 1(d), we will continue to work with AML as a coordination partner to disseminate information and organize engagement to aggregate statewide local priorities.
Comment 1: A table with contact information for the specific DOT Area Planners that are responsible for reaching out to NMLOs. I accessed the weblink provided in the document for this contact information, but found the Northern Region Area Planner position is vacant (see Contacts, Northern Region Planning, Transportation & Public Facilities, State of Alaska), the Southcoast Region Area Planner position is vacant (see Southcoast Region Planning), and it's unclear which Area Planner for Central Region would be assigned to reach out to NMLOs (see Contacts, Central Region Planning, Transportation & Public Facilities, State of Alaska). I know the State is under a hiring freeze and folks are wearing multiple hats, but I think it would be helpful to take the guesswork out of who at DOT is responsible for reaching out to NMLOs for each Region by listing them individually in the document	FAST Planning	Partially Incorporated	Section 1	We agree that clarification would be appreciated by all users. We added a comment to address vacancies in particular positions and have added resources to the NMLOCP/DOT&PF Public Involvement website; however, we are going to refrain from putting positions and contact information directly into the process memo due to the frequent turnover in staff and risk to making this standing five-year process quickly outdated
Comment 2: Second, does DOT maintain a statewide database of NMLOs? If so, I think it would be helpful at attach to this document so people see they are on the list and can count on DOT reaching out to them when key planning activities/notifications occur. And if they are not on the list, they have directions in this document for who to contact at DOT to get on the list	FAST Planning	No Change	Section 3	DOT&PF does not maintain a database of NMLOs, we rely on the DCCED database, which we linked within the document for transparency.
Comment 1: Where is the documentation of: (1) number of direct notifications issued; (2) number of comments received from non-metropolitan local officials; (3) number of coordination meetings requested, offered and conducted; and (4) identified process improvements or proposed changes. above says will be included in the five-year review?	Southeast Conference Regional Planning Organization	Partially Incorporated	Five-Year Review of the Cooperation Process	The four items noted were to create more formalized documentation of the 5yr review and update process, not a consolidation of documents from the last 5yrs. We have found this language is confusing to the readers, we have opted to continue the level of engagement and documentation but are removing the four bullets for clarity.
Comment 2: I think that there should be a bullet after this one to coordinate we RPOs in advance in areas with RPOs. Tracking and knowing local transportation projects seems like the main role of the RPOs. You could also add a bullet that the DOT&PF Area Planner may coordinate outreach with RPOs, if available.	Southeast Conference Regional Planning Organization	Incorporated	Section 1	Response: RPO's were established after the last NMLOCP was approved, so we have incorporated an additional bullet under section 1 to address early engagement with RPOs.

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Comment 3,4 & 6: or a RPO, an ARDOR, a local Chamber of Commerce, an Alaska Native Corporation or community association,	Southeast Conference Regional Planning Organization	No Change	Definitions	RPOs are included in the definition section for 'Non-metropolitan Local Officials', we have also modified the definitions section to include RPOs specifically due to their flexible nature.
What We Support: Continued recognition of RPOs as non-metropolitan local officials. Roughly 56% of the state has no general-purpose local government; preserving this language is essential, and we appreciate that it carries forward unchanged; The new RPO coordination commitment in Section 1.e. Pairing RPO coordination with the Alaska Municipal League commitment in 1.d elevates RPOs as a meaningful channel for collective rural input. This is a real improvement over the 2021 version; Continuous cooperation (Section 1.g). The ability to request meetings outside of formal LRTP/STIP cycles is genuinely useful for ongoing regional work such as the McCarthy Road Planning and Environmental Linkages (PEL) Study; Advisory committee representation (Section 2.b.i) and the clear separation between this process and general public comment (the Relationship with Public Involvement section). Both protect the integrity of cooperation with rural officials.	Copper River Valley Regional Planning Organization	N/A	N/A	Thank you, we appreciate the feedback and strive for continued improvement. The Regional Planning Organization Pilot Program is a new development since the last NMLOCP effort and we were happy to integrate these developments.
Comment 1: Explicitly extend "specifically impacted" direct notification to RPOs (Section 3.e).As drafted, only organized cities and boroughs are guaranteed direct notification when a project's scope or schedule changes, or when a project is added or removed. RPOs — which serve precisely the areas without elected officials — are not. The result is that the rural half of the state receives a weaker tier of notification than the organized half, which seems inconsistent with the cooperative intent of 23 CFR 450.210(b). CRV-RPO Recommendation #1: Extend the 3.e trigger to RPOs (and, where applicable, community economic development organizations and associations) when a project falls within their region.	Copper River Valley Regional Planning Organization	Incorporated	Section 3.e	Thank you for this suggestion, we agree and have made the adjustment to 3e.
Comment 2: Set a real minimum coordination cadence (Section 2.d). "At minimum, one coordination opportunity per STIP and LRTP cycle" is a low bar — a single touchpoint across a four-year STIP cycle is not enough to sustain meaningful cooperation, especially for rural RPOs with limited staff capacity. CRV-RPO Recommendation #2: Establish a minimum of one annual coordination meeting per RPO, plus milestone-driven engagement at scoping, draft release, and post-adoption.	Copper River Valley Regional Planning Organization	No Change	Section 2.d	We acknowledge the response and recommendation; however, the level of engagement noted here is consistent with federal and state regulations. Each individual planning effort strives for cooperation and engagement during early plan development and pre-final review. Coordination in draft scoping efforts continues as we are able, recognizing current efforts in March 2026 with a pre-review of the STIP, and April 2026 with draft scoping for the PPPP grant award. We hope the RPO pre-review of the draft NMLOCP 2026 update also serves as an example of our ongoing efforts.
Comment 3: Document an actual RPO engagement protocol. Section 1.e commits to coordinating "in advance of key statewide efforts" but doesn't define what advance means, what materials get shared, how RPO input is collected, or how DOT&PF responds to it. CRV-RPO Recommendation #3: Add an appendix describing notice periods, format, materials shared (draft project lists, mapping, funding scenarios), how RPO input is submitted, and how DOT&PF documents and responds.	Copper River Valley Regional Planning Organization	No Change	N/A	Planning views iterative engagement as impactful, and ongoing coordination has value in all planning efforts. Engagement is defined per planning effort and can be found in each respective public involvement strategy, including timelines, materials and public notice periods. Public comment periods are often outlined in statute and regulation. Also, note section 1g, "Cooperation is continuous; local officials may request meetings or presentations at any time, regardless of LRTP or STIP update cycles" for any additional requests.

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Comment 4: Tighten the definition of "Direct Notification". "Written communication... by current and best practices" leaves too much room for interpretation. CRV-RPO Recommendation #4: Specify written correspondence to a designated RPO contact with reasonable confirmation of receipt — not a generic GovDelivery blast.	Copper River Valley Regional Planning Organization	No Change	Definitions	Section 1b, communication styles may vary, phone calls, in-person meetings, RPO meetings - assigned a contact. Already built in the process.
Comment 5: Maintain a dedicated RPO contact roster. DCCED contact lists (Section 3.a) aren't built around RPO structures and may not reliably reach RPO leadership. CRV-RPO Recommendation #5: Maintain a dedicated RPO roster, verified annually with each RPO.	Copper River Valley Regional Planning Organization	No Change	Section 3.a	Agreed, the RPO Program Manager is responsible for keeping this list up to date and sharing it with the DOT&PF Planning Field Offices.
Comment 6: Acknowledge RPO capacity. Cooperation depends on RPOs having the capacity to show up. We operate on roughly \$50,000 a year while being asked to engage on STIP development, LRTP development, regional needs identification, and inter-agency coordination — the math is tight. CRV-RPO Recommendation #6: Acknowledge that effective cooperation requires sustained RPO capacity, and commit to support through data sharing (including GIS and project pipeline information), technical assistance, and reasonable reimbursement of participation costs where feasible.	Copper River Valley Regional Planning Organization	No Change	N/A	DOT&PF appreciates all the effort it takes to conduct and sustain an RPO, and acknowledges the ongoing cooperation it takes.
Comment 7: Add an accountability mechanism. The draft doesn't require DOT&PF to report on how rural input shaped STIP/LRTP outcomes. Without that, cooperation risks being a checkbox rather than a process. CRV-RPO Recommendation #7: No recommendation provided.	Copper River Valley Regional Planning Organization	No Change	N/A	DOT&PF documents rural input during STIP and LRTP development by summarizing comments received, how they were evaluated, and whether they resulted in any changes. This feedback mechanism helps ensure coordination reflects genuine engagement rather than a procedural requirement.
Comment 8: Build in a mid-cycle check-in. A 60-day comment window every five years is a narrow opportunity to refine a policy this consequential. CRV-RPO Recommendation #8: Hold an informal check-in around the 30-month mark to surface implementation issues before they wait five years for a fix.	Copper River Valley Regional Planning Organization	No Change	N/A	The NMLOCP is designed to support ongoing coordination rather than limit engagement to formal update cycles. Section 1g provides that cooperation is continuous and local officials may request meetings or presentations at any time, which allows implementation issues to be surfaced and addressed as they arise without waiting for a scheduled review. DOT&PF believes this flexible, ongoing approach provides meaningful opportunity for input throughout the cycle and is preferable to a fixed mid-cycle checkpoint that may not align with actual planning activity or community needs.
Comment 1: Recommendations from the future Denali Borough Safe Streets For All Comprehensive Safety Action Plan (grant agreement in process) become incorporated in official DOT&PF plans.	Denali Borough	No Change	N/A	Agreed, we always welcome the opportunity to collaborate on planning efforts. This information has been sent to the Northern Region Planning Chief, Brett Nelson for review.
Comment 2: The vacancy for DOT&PF Area Planner assigned to the Denali Borough is filled.	Denali Borough	No Change	N/A	We appreciate your feedback and hope to have this vacancy filled soon.
Comment 3: Alaska DOT&PF explores the possibility of developing a formalized Regional Planning Organization (RPO) for our area, potentially including the Denali Borough, City of Anderson, and City of Nenana.	Denali Borough	No Change	N/A	DOT&PF welcomes the opportunity to discuss the potential for a Regional Planning Organization in your area. The RPO Pilot Program empowers localized planning at a regional level in collaboration with DOT&PF.

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Comment 1: Ongoing Coordination and Engagement: f. DOT&PF will pursue engagement opportunities through regular forums such as the Alaska Municipal League Conferences and regional economic development summits. g. Cooperation is continuous; local officials may request meetings or presentations at any time, regardless of LRTP or STIP update cycles. These sections make good sense to me. Thank you.	Kodiak City Council	No Change	Section 1	Thank you, we appreciate the positive comment and look forward to working with you on upcoming plans.
Comment 2: Participation in Planning Processes (LRTP and STIP) c. DOT&PF will provide draft LRTP and STIP documents for review and comment during official public comment periods. d. At a minimum, DOT&PF will provide one coordination opportunity per STIP and LRTP cycle. I have an interest in the upcoming STIP and am waiting to hear about it soon.	Kodiak City Council	No Change	Section 2	Thank you for your interest in the STIP, the document will be available for public comment in the coming weeks and we appreciate your review and feedback.
Comment 3: Notification and Public Review Requirements (This process is distinct from broader public involvement procedures available to all stakeholders.) For LRTP and STIP updates, DOT&PF will: a. Directly notify organized cities, boroughs, and non-metropolitan local officials using Department of Commerce, Community, and Economic Development contact lists and other available means. b. Announce document availability via GovDelivery (or similar state delivery system) and press releases. Just a question about this. b. Announce document availability via GovDelivery, ?? Is this something I need to sign up for? Here in Kodiak we are standing by to hear how the local projects will be listed on the STIP	Kodiak City Council	No Change	Section 3	We do recommend that you review options for subscription under GovDelivery for future notifications. You can find the GovDelivery website here: GovDelivery.
Comment 1: The draft's definition of "specifically impacted" in Section 3.e.i focuses on project-level changes occurring within a local jurisdiction's boundaries. This framing does not adequately account for a common Alaska circumstance: STIP-programmed projects located in unorganized territory that generate significant transportation, economic, or resource impacts on adjacent or downstream organized communities.	Susitna River Coalition	No Change	Section 3	We appreciate this perspective and recognize the sentiment. We would advocate that you make sure you are registered for GovDelivery (provide link) notifications for the STIP and LRTP efforts, as well as partnering with any Local Officials for collaboration.
Comment 2: Alaska's geography means that many significant transportation projects (roads accessing remote resource corridors, river crossings, port access routes) are sited in unorganized areas with no local government of their own, yet can meaningfully affect communities nearby. Under the current definition, those communities would not automatically qualify for direct notification or coordination opportunities, even where impacts on transportation patterns, local economies, or shared natural resources are reasonably foreseeable.	Susitna River Coalition	No Change	Definitions	We appreciate this perspective and recognize the sentiment. We would advocate that you make sure you are registered for GovDelivery notifications for the STIP and LRTP efforts, as well as partnering with any Local Officials for collaboration.
Comment 3: The West Susitna Access Road, currently programmed in the STIP, illustrates this gap. The corridor lies outside any organized jurisdiction, but adjacent communities could experience effects including changes to regional access patterns, increased industrial traffic on connected routes, and cumulative watershed impacts affecting fisheries and water quality that underpin local economies. This pattern, a project in unorganized territory with cross-boundary effects on organized communities, is not unique to this project and is likely to recur as transportation investment in remote Alaska corridors continues.	Susitna River Coalition	No Change	N/A	The STIP public comment period serves as the opportunity for any organization or individual to comment on proposed projects. We appreciate the review of all parties as part of the public comment period, regardless of jurisdiction.

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Comment 4: SRC recommends that DOT&PF consider expanding the definition of "specifically impacted" to include organized communities that can demonstrate a reasonable nexus to a STIP project, even where the project is located outside their jurisdictional boundaries. Alternatively, DOT&PF could clarify that planning field offices retain discretion to extend direct notification and coordination opportunities to adjacent communities when cross-boundary impacts are reasonably foreseeable. Either approach would strengthen the NMLOCP's effectiveness in Alaska's distinct land ownership and governance context.	Susitna River Coalition	No Change	Definitions	The NMLOCP is a federally required process specifically for the non-metropolitan local officials; however, there specific procedures in the STIP public involvement strategy that aim to notify as many individuals and organizations as possible. The most direct way to ensure notification is by signing up for GovDelivery.