



DATE: 10 February 2026
TO: Alaska DOT&PF
FROM: AMATS Community Advisory Committee
SUBJECT: CAC Comments on the Safer Seward Project Environmental Assessment (EA)

RE: Draft Environmental Assessment (EA) for Safer Seward Highway (SSH) proposed 4-lane vertically-divided highway (C7-T design option)

Dear Safer Seward Project Team,

The AMATS Community Advisory Committee (CAC) met on February 10, 2026, and approved the following comments to be submitted to the Safer Seward Project Team. These comments reflect the AMATS CAC input only.

CAC COMMENTS

The AMATS Community Advisory Committee recommends that the draft EA should be rejected in its current form and that be revised to respond to the following comments. We request that DOT&PF release the amended draft EA for a 60-day public review period.

1. Misleading data on traffic volumes and capacity. The EA uses incomplete and misleading traffic data and traffic modeling, thereby presenting a false picture of future capacity needs and falsely claiming that only the CT-7 design can deliver safety and mobility.
2. Unrealistic safety assumptions and predictions. The EA makes patently unrealistic safety predictions for the CT-7 design, especially regarding driver behavior. The CT-7 design introduces or exacerbates several dangers, including excessive speed, driver inattention, driver impunity, increased complexity at intersections, and risks to pathway users in the clear zone.
3. Dismissal of alternatives which would minimize the physical footprint while significantly improving safety. Specifically, the EA fails to comply with Section 4(f) by not modeling alternatives with smaller physical footprints that would minimize harm to public lands of national, state and local significance. The EA does not meet the fundamental requirements of Section 4(f) of the USDOT Act (49 U.S.C. 303) which states:
 - i. *(c) the Secretary [of Transportation] may approve a transportation project ...requiring the use of publicly owned land of a public park, recreation area, or wildlife and waterfowl refuge of national, State, or local significance...only if*
 1. *There is no prudent and feasible alternative to using that land; and;*
 2. *The program or project includes all possible planning to minimize harm to the park, recreation area, wildlife and waterfowl refuge... resulting from that use. (cited in Appendix S, Sec 1.1)*
 - ii. Even if 4-lane divided highway is justified, the options range from 120 width feet using a barrier, to 148 feet with a 30-foot road median, to the 370'-foot width of some sections of the proposed CT-7 vertically-divided design (App D, Sec 1.6).
 - iii. The design will produce a median as much as 200-feet wide and vertical separation of 100 feet, with no justifiable safety improvement.
4. Missing and inaccurate data on mitigation and project function. This EA does not present the full impacts for public review, particularly: intersection function, magnitude of the scenic impacts, noise

impacts, loss of viewing opportunities at Potter Marsh, wildlife crossing within the Alaska Coastal Wildlife Refuge, loss of value to the Turnagain Arm Trail, and substantial loss of several forms of recreation.

5. Undervalued impacts. The EA minimizes and ignores numerous adverse impacts from the proposed CT-7 design, including irremediable damage to the unique scenic and recreational values of Potter Marsh and the Turnagain Arm corridor. The EA does not represent public values identified repeatedly in previous comment periods and at recent public hearings.
6. Failure to comply with Section 6(f). The EA does not meet the requirements of 6(f) of 49 U.S.C. 303 because the EA findings in Appendix T, Section 6.1, 6.2 and 7 and Appendix U Sections 6.1 are inaccurate. As this letter substantiates, we find instead that:
 - a. Substantial changes would result to the visual environment.
 - b. Substantial changes would result to the parkland and recreation within Chugach State Park along the project corridor
 - c. The proposed measures in EA Sections 3.1 (Physical Environment), 3.2 (Biological Environment) and 3.3 (Human Environment) are inadequate to avoid, mitigate, or minimize harm because the overscaled design is unnecessary, and amplifies harm by its dimensions and its promotion of excess speed.
7. The cost burdens to the budgets of AMATS. Although the EA is not intended to determine affordability or cost-efficiency of a project, AMATS is obligated to meet a wide range of transportation needs with fiscal constraints. This project will diminish the funding available to meet AMATS needs and priorities, and AMATS therefore has a fiduciary reason to oppose a project of this scale and cost.
8. Insufficient Purpose and Need statement. The purpose of the project is to improve safety and maintain the Scenic Byway intrinsic qualities by reducing crash rates and severity, improve mobility and reliability, safely accommodate mixed uses within the corridor, and provide a context sensitive design.

The EA presents a false and misleading statement of need with regard to:

1. Capacity
 - a. No basis given for the 1% annual linear growth in traffic volume
 - i. The EA presents no data on actual traffic trends in project corridor
 - ii. DOT&PF websites show much slower or even no traffic increase. For example, the past 10 years, average annual daily traffic has been flat at several monitoring locations in this corridor (see alaskatrafficdata.drakewell.com for MP 113.4 McHugh Creek and MP 108 Indian, 2015-24)
 - b. EA fails to address induced traffic demand
 - i. New trips generated by the appeal of “open road”
 - ii. Additional trip miles caused by right-only access
 - c. The EA data shows that there is a marked spike for one month of each year: July. The draft EA traffic data to emphasize this one-month spike. Traffic counts are 10% lower in June, 20% lower in August, and
 - i. DOT&PF focuses on the three highest months of traffic and unfounded growth rate of 1 percent annually to come up with a 2024 design ADT of 13,740 vehicles, even though this volume occurs only north of Potter Valley Road and only for two months of the year. The average annual daily traffic (AADT in the five segments varies from 7,730 to 9,550. (Appendix G, Table 3-3.
 - d. DOT&PF uses the 30th highest hourly volume to establish a design hourly volume of 2,061 vehicles per hour. DOT&PF does not show how many days have high volumes. Given that July is anomalous

(10-30 percent higher traffic volume than the next-busiest month, depending on the segment), traffic on a handful of days per year is the justification for the four-lane capacity.

- i. DOT&PF assumes passing opportunities for 99.97 percent of the time while also predicting that though the AADT for all segments will far exceed the design volume by 2052. Appendix G, Figure 3-3
- e. Intersection traffic loads not well modeled
 - i. EA fails to address induced intersection function.
 - 1. Traffic will be concentrated owing to the limiting of access points, especially at Potter Valley Road where DOT&PF website shows 1,970 AADT entering/exiting cars currently and no projections for future. Seasonal design hourly volume in 2024 is 2,061 cars: or 34 cars per minute; or 1 car every 1.75 seconds. (App G, Table 3-5)
 - 2. DOT&PF gives no data on future intersection function Indian Valley has 180 AADT, and Bird has no given data for current or projected intersection traffic.
 - ii. The through-traffic suggests that uncontrolled intersections will fail. Example of Potter Valley Road: 2,723 cars per hour=45 cars per minute=1 car every 1.3 seconds. How will cross-traffic turn into or across that flow? (App G, Table 3-11). McHugh to Beluga to Rainbow: 2,382 cars per hour=40 cars per minute=1 car every 1.5 seconds
 - iii. DOT&PF shows a subjective bias toward building lanes to allow “light traffic”: “LOS D is considered acceptable for urban highways but undesirable for rural highways. Segment density is regarded as a bad outcome, not a good return on investment.
- f. DOT&PF has a history of overbuilding: e.g. Sterling Highway 5-lane section on the Kenai Peninsula, the Trunk Road in Palmer/Wasilla, and numerous highway sections around Fairbank

2. Safety

- a. This design does not promote safe speed: it encourages excessive speed.
 - i. Even in the No-Build option, in 2052, drivers will be able to travel at or above 55 mph average travel speed, except the area of Bird at Boretide Road where 2052 average travel speeds will be 53-54 mph. (App G, Tables 3-12, 3-14, 3-16, 3-19, 3-21).
 - ii. Providing 99% opportunity to pass (CT-7 design) will reward reckless drivers who seek to exceed the design speed, *given that platooning vehicles can generally still achieve design-speed of 55 mph in even the No-Build Scenario for 2052.* Section 3.2.2 Table 3-12 in the EA.
 - iii. The focus on summer peak traffic volumes for all modeling and assessments (App C, 2.4.1.1) is not based on safety but on the DOT&PF judgment that platooning is unacceptable: “Platoon sizes of 5 to 10 vehicles are common, although speeds may be able to be maintained”. DOT&PF has not addressed the traffic-calming effect of platooning which may be achieved when passing is pointless or not possible.
- b. Safety does not appear to require the 4-lane capacity: 64 percent of crashes occur from October through March, when traffic volumes are half that of summer traffic. (App C, Figure 2-2)
- c. DOT&PF uses such a small data set of crash data that it is difficult to determine safety priorities or to show statistically meaningful safety differences between alternative designs. The crash data covers 5 years (2017-2021). The design life of the project is 25 years.
- d. The crash data analysis disguises the very slight reduction in deaths from 4-lane versus a three-lane design, by using percentages instead of actual deaths. There were four fatalities in the five-year statistical period, or 0.8 deaths per year. The 3-lane design (C2 M) would reduce that by 42% to 0.34 lives per year. The 4-lane design would reduce the rate by 68 percent to 0.26 lives per year. In both instances, the designs would save a little less than half a life per year.
- e. Proposed road configuration promotes

- i. Excess Speed – The highway contains stretches where the geometric design can support speeds up to 80 mph between curves. (Appendix C, Sec 2.3.2.2.) Best design practices are to keep the roadway design speed differences below 10 mph between successive curves to increase safety. (Ibid). Roadways that have differentials of 10 to 30 mph between successive curves can result in drivers losing control of their vehicles (ibid).
 - ii. Inattention- DOT&PF has not addressed the disengagement effect of a 4-lane divided road where drivers are likely to reduce their attention to driving.
 - iii. Impunity. The breadth of the shoulders, medians, and clear zones creates a sense of impunity for drivers—the opposite of edge friction which promotes alert and defensive driving.
 - f. The crash modeling has three serious flaws that discredit the safety results. 1. The model uses an unrealistic speed. Speed used for modeling the four-lane design is 58 to 59 miles an hour miles per hour. Whereas DOT acknowledges in the reconnaissance study that drivers actually drive 65 to 73 miles per hour in existing passing zones on the Seward Highway. 2. the volumes of heavy truck traffic required for the four-lane divided design are not included in the crash modeling. 12 million cubic yards of material to haul off site could generate 1.6 to 2 million tandem dump truck loads. 3. There is no standard model to show safety gains on curves from converting a two-lane to a multi-lane design. HDR used its own model that has not been vetted or peer reviewed.
 - g. The pathway is within the highway clear zone. Non-motorized users will not be protected from vehicles leaving the roadway. There were 110 run-off-the-road crashes from 2017-2021 (single vehicles or motorcycles running off the roadway) amounting to 47% of all crashes along the project corridor (App G, table 2-2)
 - h. There are numerous places where pathway access to recreation trailheads requires crossing the traffic lanes. Gaps between cars will be less than 2 seconds at peak hours (App G Table 3-11 shows peak hour traffic volumes of 2,100 to 2,700, equates to equate to 35 to 43 cars per minute)
 - i. Erroneous dismissal of non-construction activities to improve safety. DOT&PF does not acknowledge the benefits of the pending variable speed limit project; and outright dismisses other Active Traffic Management techniques such as shoulder use, queue warning, and lane control by deciding that these are more appropriate for high-volume, high-speed facilities within urban corridors. (Appendix D. Sec 1.5.1)
 - j. Significant cumulative safety effects are possible within the current road corridor (App G table 2-11, yet the EA buries this potential and doesn't refer to it.
 - i. 30 percent reduction in wintertime crashes - variable speed limits
 - ii. 5 percent reduction in crashes – sloped transition at the pavement edge
 - iii. 45 percent reduction in single vehicle run-off-the-road crashes – guardrails
 - iv. 20 percent reduction in non-intersection crashes from curve warning signs
 - v. 25 percent reduction in crashes - illumination of certain segments to reduce night crashes
 - vi. Undetermined reductions – flatten or regrade road edge to aid errant vehicle recovery
 - k. Obscuring of the incremental safety benefits from various design options. Safety assessment matrix shows that a 3-lane option will have the same magnitude of safety for both motorists and pathway users/vulnerable road users: an improvement of 33 to 66% over No-Build conditions. Total crash reduction for a three-lane option will be 33 to 66%. (App G. Table 2-12, Safety Assessment Matrix). Given the small data set for crashes and particularly for fatal crashes, the Safety Matrix should show the different outcomes with ordinal numbers, not percentages.
- 3. Mobility and reliability
 - a. Mobility is decreased by out-of-direction travel and frontage roads at several locations: Bird, Indian, Falls Creek trailhead, Indianhouse Mountain trailhead, Potter Trailhead.
 - b. The EA gives no statistics to indicate that emergency response time has been an issue (EA 1.2.2, Project Needs)

- c. The EA gives no data on the frequency of emergency road closures and delays (EA 1.2.2, Project Needs), nor any comparable statistics on construction related road closures and delays, which are far more frequent. Reliability may be higher if the project scope is smaller and results in fewer construction delays and closures.
4. Failure to present alternative designs, maintenance strategies, and traffic management strategies that could effectively and efficiently and significantly improve safety.
 - a. Traffic management strategies (shoulder use, queue warning, lane control, variable speed limit)
 - b. Frequent traffic law enforcement
 - c. Two-lane barrier divided with wider shoulders for emergency or peak hour use
 - d. Two-lane with more turn pockets and acceleration/deceleration lanes
 - e. Three-lane, also called Two-lane-plus-one) – alternating passing areas
 - f. Non-motorized path designed to allow emergency vehicle travel
5. Inadequate and prejudiced assessment of scenic and recreation impacts
 - a. The EA uses a “degraded baseline” presumption to assert that the visual and aesthetic impacts of the proposed action “would not substantially change the visual environment because rock cuts, a highway, and a railroad currently exist within the Project Area” Appendix U, Sec 6.1)
 - b. The non-motorized pathway only 10 feet from the highway edge, and less than that from frontage road, will subject pathway users to danger from cars leaving the roadway, as well as poor air quality, constant high noise, and scenic degradation
 - c. There will be significant, irremediable degradation of the recreation uses:
 - Turnagain Arm Trail (see below),
 - Rock-climbing,
 - Water uses – (kite boarding, bore-tide surfing/kayakriding)
 - Wildlife and inlet viewing
 - Unstructured recreation and exploration at pullouts
 - d. Rock walls 30 feet to 400 feet along over 7 miles of Turnagain Arm. Visual images in App N do not provide the scale, and do not show the decades-long artificial appearance
 - e. Traffic lanes perched as high as 100 feet on the cliffsides create a new type of scar
 - f. Extensive fill on tidelands will erase remnants of the natural coastline almost entirely.
6. Inadequate assessment of Potter Marsh and Coastal Wildlife Refuge Impacts. Visual effects, safety, and wildlife enjoyment all have far greater impacts than depicted in the EA
 - a. No acceleration and deceleration lanes are depicted at Potter Marsh; these are likely needed. They will affect the visual appearance and safety.
 - b. Wildlife crossing
 - i. MP 115-116 is a high moose crash area
 - ii. MP 116-118 is the only intact relatively-low urbanized corridor for wildlife movement from the coastal refuge to the alpine areas
 - iii. Total corridor width will expand from 2 lanes to 4 to 6 lanes, with continuous passing and a fence along the Railroad. Unsurvivable for wildlife.
 - c. Reduced bird viewing with no vehicle pull-outs
 - d. Non-motorized Pathway unsafe from cars leaving the roadway
 - e. Visual impact of Potter Frontage Road plus turning lanes plus parking not depicted accurately.
 - f. Replacement parking for Potter Section House not shown
 - g. Maximal impact at Windy Corner

- i. Railroad and highway realigned over 300 feet into Turnagain Arm waters and fill across tidelands
 - ii. 1,400-foot parking lot that is not integrated into the natural setting and is the scale of a large outlet mall parking lot
7. Turnagain Arm Trail
 - a. The current character of the trail is wildlife rich, largely out of sight of the highway, and noise-free for long stretches. Those qualities haven't been acknowledged and can't be replaced.
 - b. Unique all-season, all-weather trail setting. South exposure and low elevation means heavy spring and fall use.
 - c. The impact to the trail character was dismissed based on the degraded baseline perspective that it's not pristine, so further impacts to the natural setting are of little additional consequence
 - d. The Proposed Action shows multiple trail segments will be "reroute(d) if needed" --No guarantee of realignment where the construction is near but not on top of the current trail
 - e. Interrupted use of the trail for years at a time. Turnagain Arm Trail will be closed for construction and not re-built until construction is complete. No timeframe for replacement of trail.
8. Recreation impacts not evaluated for in-kind, in situ replacement potential
 - a. Rock climbing access is difficult to replace
 - b. Coastal views for 1 million people per year where the view is dominated by tides, weather, whales, water sports cannot be fully compensated but these experiences should be part of the replacement
 - c. Character of the Turnagain Arm Trail cannot be fully compensated but the natural setting and all-season easy access should be part of the replacement
 - d. The proposed replacement parcel is 103 acres miles from the impacted coastal area, in Stuckagain Heights subdivision. EA, Section 3.3.13.3). The EA provides no map nor description of the recreation attributes: this would presumably enable a parking lot in an area with three Chugach State Park parking areas already. It would create no new recreation opportunity. It would provide no access to Turnagain Arm. There is no evidence that a distant parking lot comes close to replacing the loss of dramatically-scenic land, with unique recreation qualities.
 - e. The proposed Parking lots do not replace recreation experiences. Parking for vehicles does not compensate for the loss of active or passive recreation by people.
9. Future cost burden to all residents
 - a. Maintenance costs have not been predicted. DOT&PF and DPOR pays for all maintenance with State funds
 - b. Additional lane miles have not been quantified, but the lane miles requiring maintenance will more than double. Acceleration lanes up to 1,260 feet long are recommended at intersections, and deceleration lanes up to 605 feet long per App G Table 3-24. In addition to expanding from two to four lanes, the proposed C7-T design includes frontage roads in three locations, numerous driveways and large parking lots, and over 20 miles of non-motorized pathway with multiple undercrossings.
10. Diversion of funding from more deadly roads and intersections in Anchorage.
 - a. This project dwarfs the 4-year AMATS TIP, which comes in under \$1 billion in 2027-2030. The \$1.4 billion cost estimate for SSH may be a gross underestimate, given the many design constraints still unresolved. DOT&PF have had major cost overruns in recent years: O'Malley Road reconstruction, Cooper Landing Bypass, among others. It is very likely this project would delay and prevent the funding of numerous projects within the AMATS area with higher safety needs.



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In conclusion, AMATS CAC recommends NOT approving this draft Environmental Assessment because the overscaled design is unnecessary and unjustified, based on an unsupportable statement of purpose and need. The C7-T proposed action does not minimize or mitigate the damage to the Turnagain Arm setting because of its dimensions and it does not deliver significant safety benefits compared to other options. On the contrary, it appears to promote excess speed as well as driver impunity and inattention.

PASSED AND APPROVED by the AMATS Community Advisory Committee
this 10th day of February 2026.

Christine Schuette

Christine Schuette – AMATS Staff Facilitator to the CAC